



**PURVANCHAL VIDYUT VITARAN NIGAM LTD.  
PURVANCHAL VIDYUT BHAVAN,  
VIDYUT NAGAR, P.O.-D.L.W.,  
VARANASI-221004**

**E-Mail :- dircompuvvnl@gmail.com  
CIN-U31200UP2003SGC027461**

No. /PuVVNL/Commercial/

2944

Date: 29.04.2022

To

**The Secretary,  
Hon'ble Uttar Pradesh Electricity Regulatory Commission,  
Vibhuti Khand, Gomti Nagar,  
Lucknow-226010.**

**Sub:** Reply on MoM of TVS dated 18.04.2022 in the Petition No. 1834 of 2022 dated 8<sup>th</sup> March, 2022 of True-Up (FY 2020-21), Annual Performance Review (FY 2021-22), Aggregate Revenue Requirement (FY 2022-23).

**Ref:** UPERC email received on MoM of TVS dated 18.04.2022.

Dear Sir,

This is with reference to your above-mentioned email received from Hon'ble Commission on MoM of Technical Validation Session (TVS) dated 18.04.2022 for UPPCL Discoms on True-Up (FY 2020-21), Annual Performance Review (FY 2021-22), Aggregate Revenue Requirement (FY 2022-23).

The Licensee hereby submits the point-wise replies to the queries/information required by the Hon'ble Commission on MoM of TVS dated 18.04.2022 along with all the Annexures, wherever required is attached herewith for kind consideration of the Hon'ble Commission.

Enclosure: As above.

Yours Sincerely,

**(Ravi Prakash Dubey)  
Chief Engineer Level-I (Comm.)-II**

Copy :-

1. Managing Director, PuVVNL, Varanasi.
2. O.S.D.(Commercial), PuVVNL, Varanasi.



**Reply to TVS MoM dated 18.04.2022, Information Requirement /  
Discrepancies/ Data Gaps in the Petition No. 1834 - 2022 dated 08<sup>th</sup>  
March, 2022**

**of**

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

**of**

**PUVVNL**

The Commission has sought the following additional queries during the TVS: -

1. Petitioners to submit the details of station-wise Transmission Charges (Inter-State and Intra-State) & Losses (Inter-State and Intra-State) for FY 2022-23 as submitted in the Format F13 along with requirement of fortnightly sales and power purchase. This would be required for making MOD as per the UPERC MOD Regulations, 2021 & implementation of IC.

**Reply:**

Marking of Power plant under Inter State and Intra State is attached under **Annexure -I**. Moreover, as submitted under Data Gap reply 2, the Transmission charges of Inter State Plant is MW basis that cannot be marked plant wise. It is further submitted that the petitioner has considered the 52 weeks' average for the inter-state transmission loss i.e. 3.47%.

For Intra State, the Petitioner has considered the Intra State losses for FY 2022-23 as 3.27%. The transmission charge has been considered Rs 0.2421 per unit as approved by the Hon'ble Commission in Tariff Order for 2021-22 dated 9<sup>th</sup> July 2021.

2. Petitioners to provide 10 sample bills each for FY 2020-21 and FY 2021-22 of Central and State Generating Plants to vet the details of Tx related charges etc.


**Reply:**

The sample bills for FY 2020-21 and FY 2021-22 of Central and State Generating Plants have been enclosed as per **Annexure -II**.

3. Petitioners to submit the details of RRAS (Reserves Regulation Ancillary Services) claimed for FY 2020-21 in the Power Purchase along with a detailed note on the mechanism of RRAS.

**Reply:**

It is submitted that, due to typo error, the reactive energy charge receivables/payables (Rs. -11.66 Crores) have been recorded as RRAS. The month-wise breakup of reactive energy charge receivables/ payables is attached as under for kind consideration of the Hon'ble Commission.

  
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## REACTIVE ENERGY CHARGES (RECEIVABLE) - FY 2020-21

*in Rs Crores*

| MONTH        | NRPC         | UTRAKHAND   | RAJASTHAN   | HARYANA     | Grand Total  |
|--------------|--------------|-------------|-------------|-------------|--------------|
| Apr-21       | -            | -           | -           | 0.08        | 0.08         |
| May-21       | 0.88         | -           | -           | 0.17        | 1.05         |
| Jun-21       | 0.24         | -           | -           | 0.10        | 0.34         |
| Jul-21       | 0.57         | -           | -           | 0.19        | 0.76         |
| Aug-21       | 1.07         | -           | 0.01        | 0.17        | 1.25         |
| Sep-21       | 0.99         | -           | -           | 0.09        | 1.07         |
| Oct-21       | 1.01         | 0.01        | -           | 0.22        | 1.23         |
| Nov-21       | 3.70         | -           | -           | 0.09        | 3.79         |
| Dec-21       | 0.92         | -           | -           | -           | 0.92         |
| Jan-22       | 0.19         | 0.04        | -           | -           | 0.23         |
| Feb-22       | 1.02         | -           | -           | -           | 1.02         |
| Mar-22       | -0.13        | -           | -           | 0.04        | -0.08        |
| <b>TOTAL</b> | <b>10.46</b> | <b>0.05</b> | <b>0.01</b> | <b>1.15</b> | <b>11.66</b> |

- Petitioners to submit the Compliance status of RPOs for FY 2020-21 to FY 2021-22 along with the MUs purchased from each power source viz., solar, non-solar and hydro.
- Petitioners to submit the Compliance projections for RPOs for FY 2022-23 along with the proposed MUs to be purchased from each power source viz., solar, non-solar and hydro.


### Reply to point no. 4 & 5:

The Petitioner humbly submits the Compliance Status of RPOs for FY 2020-21 to FY 2022-23 is enlisted below:

| Type      | Parameter                 | Units                        | FY 2020-21 | FY 2021-22 | FY 2022-23 |           |
|-----------|---------------------------|------------------------------|------------|------------|------------|-----------|
| Solar     | RPO Target (Solar)        | %                            | 3.00%      | 4.00%      | 5.00%      |           |
|           | RPO Target (Solar)        | MU                           | 3017.42    | 4262.97    | 5411.45    |           |
|           | Solar Energy Purchased    | MU                           | 4110.33    | 4674.98    | 4855.32    |           |
|           | Total RPO achieved        | %                            | 136.22%    | 109.66%    | 89.72%     |           |
| Non-Solar | Other Non-Solar           | RPO Target (Non Solar)       | %          | 6.00%      | 6.00%      | 6.00%     |
|           |                           | RPO Target (Non Solar)       | MU         | 6034.85    | 6394.46    | 6493.74   |
|           |                           | Non Solar Energy Purchased   | MU         | 5050.39    | 4698.25    | 9071.82   |
|           |                           | Total RPO achieved           | %          | 83.69%     | 73.47%     | 139.70%   |
|           | Hydro Purchase Obligation | Gross Net energy consumption | MU         | 100580.76  | 106574.30  | 108228.98 |
|           |                           | HPO Target (Hydro)           | %          | 2.00%      | 3.00%      | 3.00%     |
|           |                           | HPO Target (Hydro)           | MU         | 2011.62    | 3197.23    | 3246.87   |
|           |                           | Hydro Energy Purchased       | MU         | 266.64     | 364.95     | 2443.93   |
|           |                           | Total HPO achieved           | %          | 13.26%     | 11.41%     | 75.27%    |

\* Please Note that in FY 2020-21 RTSS Generation of 394.52 MUs has been considered in computations.

- Petitioners have submitted the GoUP subsidy for FY 2022-23 as Rs. 14500 Crore. The Petitioners to provide the supporting documents of GoUP.

  
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**Reply:**



It is submitted that the Budget details of GoUP is yet to be finalised and the same shall be submitted accordingly. The interim details for 1<sup>st</sup> quarters of Energy Dept. along with the supporting document is attached for reference as **Annexure –III**.

7. Petitioners to submit the justification as to why there is such a huge gap (actual vs. approved) in power purchase cost and MUs in FY 2020-21 even after the provision of Incremental Cost provided for in the UPERC Tariff Regulations, 2019. Do this analysis on a monthly basis.

**Reply:**

It is submitted that the month wise comparative statement of Approved vs Actual Quantum and Amount is mentioned as under:-

| APPROVED POWER PURCHASE FOR FY 2020-21 |                        |                        | Actual in FY 2020-21   |                      |                      |                 |                   |                      |
|--|------------------------|------------------------|------------------------|----------------------|----------------------|-----------------|-------------------|----------------------|
| Month                                  | Approved Quantum (Mus) | Approved Cost (in Cr.) | Per unit Approved Cost | Actual Quantum (Mus) | Actual Cost (in Cr.) | LPS (in Cr.)    | Net Cost (Rs Cr.) | Per unit Actual Cost |
| Apr                                    | 7,507.70               | 3,727.82               | 4.97                   | 7,337.93             | 3,702.06             | -               | 3,702.06          | 5.05                 |
| May                                    | 10,116.04              | 5,022.94               | 4.97                   | 9,507.16             | 4,160.15             | -               | 4,160.15          | 4.38                 |
| Jun                                    | 11,133.77              | 5,528.28               | 4.97                   | 10,834.98            | 4,343.64             | 0.04            | 4,343.60          | 4.01                 |
| Jul                                    | 11,098.66              | 5,510.85               | 4.97                   | 13,440.71            | 5,591.24             | 1.21            | 5,590.03          | 4.16                 |
| Aug                                    | 11,300.80              | 5,611.21               | 4.97                   | 12,085.94            | 5,147.29             | 13.74           | 5,133.55          | 4.25                 |
| Sep                                    | 10,169.52              | 5,049.50               | 4.97                   | 13,092.66            | 5,642.97             | -               | 5,642.97          | 4.31                 |
| Oct                                    | 9,098.78               | 4,517.84               | 4.97                   | 10,596.31            | 4,588.22             | -               | 4,588.22          | 4.33                 |
| Nov                                    | 7,982.58               | 3,963.61               | 4.97                   | 7,458.21             | 3,898.22             | -               | 3,898.22          | 5.23                 |
| Dec                                    | 7,844.90               | 3,895.25               | 4.97                   | 8,276.78             | 4,110.57             | 69.37           | 4,041.21          | 4.88                 |
| Jan                                    | 8,435.13               | 4,188.32               | 4.97                   | 8,678.10             | 3,816.95             | 17.37           | 3,799.58          | 4.38                 |
| Feb                                    | 7,634.47               | 3,790.76               | 4.97                   | 8,551.33             | 5,068.45             | -               | 5,068.45          | 5.93                 |
| Mar                                    | 7,005.29               | 3,478.36               | 4.97                   | 10,729.84            | 10,379.41            | 3,282.68        | 7,096.73          | 6.61                 |
| <b>FY 2020-21</b>                      | <b>109,327.65</b>      | <b>54,284.73</b>       | <b>4.97</b>            | <b>120,589.94</b>    | <b>60,449.16</b>     | <b>3,384.40</b> | <b>57,064.76</b>  | <b>4.73</b>          |

- As it can be observed from the table that the Hon'ble Commission while approving the per unit cost has considered it as Rs 4.97 per unit for all the months while the actual cost incurred by UPPCL during the FY 2020-21 varied month on month.
- It is pertinent to mention here that the overall actual units purchased by the UPPCL during the tenure is Rs 4.73 per unit which is less than the per unit cost of the Commission.
- It is further submitted that as per the clause 8.1 (d) of UPERC MYT Regulations 2019, Power purchase is an uncontrollable factor.
- It is submitted that the Hon'ble Commission has amended the provision for IC mechanism and the same was gazetted on 19.01.2021.
- The Actual Consumption during the peak months specifically during July to Oct has increased drastically. Probable factor in this would be the after effect of Post 1<sup>st</sup> Covid wave which occurred during the Mar-April 21 specifically. Industries were trying to increase the production to make up for the losses during the Covid period.

8. Petitioner to submit all the approvals for FY 2020-21 for Capex in compliance of Regulation No. 44.2 of UPERC MYT Distribution and Transmission Tariff Regulations, 2019.

  
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**Reply:**



The details have already been submitted to the Hon'ble Commission under query no. 49 of 1<sup>st</sup> data gap submission on 11.04.2022. However, the same is again reproduced below as mentioned table which shows the break-up of capex claimed v/s approved from FY 2020-21 for PUVVNL: -

| Schemes   | Approved in TO<br>11.11.2020    | Claimed                         | Purpose   |
|---|---------------------------------|---------------------------------|---|
|   | Investments /<br>Capex (Rs. Cr) | Investments /<br>Capex (Rs. Cr) |   |
| Other Schemes   |                                 | 1501.21                         | Network expansion /<br>Network Growth /<br>Loss reduction |
| RGGVY 11th Plan and 12th Plan                               |                                 | 98.1                            | Network expansion /<br>Network Growth                     |
| DDUGJY  |                                 | 145.26                          | Network expansion /<br>Network Growth                     |
| IPDS  |                                 | 155.16                          | Network expansion /<br>Network Growth /<br>Loss reduction |
| SAUBHAGYA YOJNA   |                                 | 356.42                          | Network expansion /<br>Network Growth                     |
| Total excluding Interest and<br>employee capitalization (A) | 3249.16                         | 1873.11                         |   |
| Add: Employee Capitalization (B)                            | 386.41                          | 214.88                          |   |
| Add: Interest Capitalization (C)                            | 208.28                          | 168.16                          |   |
| <b>Total (D= A+B+C)</b>                                     | <b>3843.85</b>                  | <b>2256.15</b>                  |   |


9. Petitioners to provide justification for the claim of Rs. 3353.87 Crore against Late Payment Surcharge (LPS) for FY 2020-21 against the power purchase cost of Rs. 60449.16 Crore (Rs. 57095.29 Crore excluding LPS), which comes out to ~5.87% of the total power purchase cost.

**Reply:**

It is respectfully submitted that the Licensees/UPPCL are financially stressed due to various reasons including lower revenue collections due to COVID – 19 Pandemic, poor revenue collection from rural areas and delay in payment of electricity bills by various consumers, etc. Due to cash deficit the licenses are unable to pay its power procurement bills on time. Further Discoms have to borrow working capital loan to pay the power purchase bills of generators. In this regard it is respectfully submitted that on one hand the Hon'ble Commission does not allow the actual interest incurred by the Petitioner on Working Capital Loans, and on the other hand, the Hon'ble Commission is reducing the late payment surcharge recovered from the consumer from the ARR of the Licensee. Thus if there is any disallowance in Late payment surcharge incurred by the Petitioner, the same would double whammy for the Petitioner. It is therefore requested that the Late Payment Surcharge claimed by the Petitioner may kindly be allowed by the Hon'ble Commission.

10. Petitioners to submit the Comptroller and Auditor General of India (CAG) Reports for FY 2019-20 & FY 2020-21 for Discoms and UPPCL.

**Reply:**

  
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It is pertinent to highlight that the Petitioner has already clarified the same in response to query number 4 of data Gap-1. However, it is reiterated that all the requisite data is submitted to CAG, but the final CAG report is still awaited for FY 2019-20 and FY 2020-21. The Petitioner will submit the same to Hon'ble UPERC whenever it is issued by CAG.

11. Tariff is the prerogative of the Commission, however as per the scheme of the things, the petitioners still submit the Tariff Proposal. Similarly, the approval of the roadmap for reduction of Cross-subsidies are also a prerogative of the Commission but the Petitioner should submit the proposal for Roadmap for reduction of Cross-subsidies as per the Tariff Policy for approval by the Commission as its their consumers and they are more in grip with the realities on the ground.

**Reply:**

It is already provided to Hon'ble Commission under query nos. 1 to 3 of 2<sup>nd</sup> data gap submission on 22.04.2022.

12. It is observed that the Petitioners have submitted 2 Consumers as "Extra State Consumers" in the revenue sheets (1 consumer of MVVNL and 1 consumer of PUVVNL). Petitioners to submit the details of such consumers and provide the Tariff approvals by the Commission for such consumers.

**Reply:**

**PuVVNL:** The Petitioner hereby submits that, agreement for supply of electrical energy executed between Electric Distribution Division-II, Ballia, PurvanchalVidyutVitrans Nigam Limited (PuVVNL) and Electrical Supply Division, Buxar, South Bihar Power Distribution Company Limited (SBPDCL) at Buxar on 21.02.2015 is attached herewith as **Annexure-IV** for PuVVNL for kind consideration of Hon'ble Commission.

13. Petitioners have submitted the Billing Determinants of Torrent- Distribution Franchisee for FY 2020-21 to FY 2022-23 in response to the Commission's queries. However, it is observed that the values of Contracted Load and Sales as submitted in the response does not match with the values provided in the Petition. Hence, the Petitioners to submit the justification for the same along with its reconciliation.


**Reply:**

This query is not related to Licensee.

14. It is observed that the Bad and doubtful debts of PUVVNL for FY 2020-21 as per its Audited Accounts in Rs. 93.34 Crore, whereas the Petitioners have claimed an amount of Rs. 175.26 Crore in the Petition. Petitioners to provide detailed justification for the same along with the reconciliation with the Audited Accounts for FY 2020-21.

**Reply:**

It is already provided to Hon'ble Commission under query nos. 18 of 2<sup>nd</sup> data gap submission on 22.04.2022 by PUVVNL.

  
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15. Petitioners have submitted the details for Rs. 128.60 Crore against Open Access Charges recovered for FY 2020-21 in response to the Commission's queries. However, the same is submitted as Rs. 23.15 Crore in the Petition. Petitioners to provide detailed justification for the same along with the reconciliation with the Audited Accounts for FY 2020-21.

**Reply:**

It is pertinent to highlight the Petitioner has already provided the detailed reconciliation of Open Access Charges received in FY 2020-21 with the audited balance sheet in response to query number 14 of Data gap- 2.

However, it is pertinent to highlight that the state Discoms has recovered total Rs. 89.21 Cr only towards Open Access Charges and its reconciliation is available in response to query number 14 of Data gap- 2.

Moreover, as about the point of mentioning only Rs. 23.15 Cr. as OA charges in Petition, it is clarified that since PVVNL only captures the Cross Subsidy Surcharges as a separate head in audited balance under note 18, the same is shown under revenue from Open Access in the Petition. Balance OA charges amounting to Rs. 66.06 Cr. is already considered by the Petitioner under "Revenue receipts" which is reflected either under Revenue from Operations (Note-17) or Other Income (Note-18). Hence, it is separately not shown under Revenue from Open Access in the Petition.

The breakup of Revenue from Operations (Note-17) (which capture OA charges under Misc. Charges from consumers) is separately provided by each petitioner in response to query number 64 of Data gap -1 and break up Other income (Note-18) (which capture OA charges under Misc. receipts from consumers) is separately provided by each petitioner in response to query number 14 of Data gap -2


16. The Commission had directed the Petitioners in the Order for FY 2020-21 dated 11.11.2020 as below:

"6.10.8. Further, the State owned Discoms are directed to maintain a separate individual asset wise FAR for assets capitalized after 1.4.2020 and the Gross Block and Depreciation may be computed separately from the Gross Block before 1.4.2020. Accordingly, from FY 2020-21 onwards the State Owned Discoms to maintain two separate Gross Blocks (one for assets upto 31.3.2020 (Part-A) and second for assets after 1.4.2020 (Part B) and two separate FAR's depicting addition of Assets details from 01.04.2020 onwards for the purpose of depreciation computation for Regulatory Accounts."

Petitioners to submit the compliance for the same.

**Reply:**

It is respectfully submitted that the above direction of the Hon'ble Commission has been complied by the Petitioner in its current Petitions and the Gross Block and Depreciation are computed separately before 01.04.2020 (Part-A) and assets after 01.04.2020 (Part-B). Further, it is submitted that the FAR is being prepared matching with the balance sheet of the Licensee.

  
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17. The Petitioners to submit the details of Net metering & Gross metering including units and commercial details for FY 2020-21 and FY 2021-22.

**Reply:**

It is again submitted that the new Revenue Management system has been deployed by the Petitioner and the consumer billing data is under transition from the old billing system to new billing system. Further, the Petitioner has incorporated the provision for tagging the consumers under net metering and gross metering.

18. The Petitioners to submit the month-wise as well as fortnightly details of Power purchase for FY 2022-23 as in the Additional Formats provided by the Commission vide letter no. UPERC/Secy/D(T)/21-1019 dated 2nd November, 2021 for determination of MOD and Incremental Cost as per the UPERC MOD Regulations, 2021 and UPERC Tariff Regulations, 2019 respectively.

**Reply:**

It is humbly submitted that the bills submitted by various Generators are raised on monthly basis. The projections are carried out on the basis of monthly PLF of the generator based on last 5 years' data. Therefore, the data available for projections for FY 2022-23 is on monthly basis which has already been submitted to the Hon'ble Commission in various formats of F13.

19. It is observed that the Petitioners have sold short term power in the exchange for FY 2020-21. Petitioners to provide details of the monthly sales and purchase from the exchange along with the justification regarding sudden variation in the demand for purchase/sale of such power in the exchange. Undertake that no power was purchased on short term at time slots when power was sold on exchange.

**Reply:**


It is submitted that the monthly sales and purchase from exchange has already been submitted to the Hon'ble Commission in "F13 20-21\_True up" formats under 1<sup>st</sup> Data Gap Submission.

Regarding justification for sudden variation in demand supply, it is humbly submitted that the load variation during the peak and off peak hours in UP is significant, therefore, the power is usually purchased from the Exchange during Peak hours when there is shortage and is usually being sold during off peak hours where there is surplus capacity. Moreover, it is submitted that Power purchase is uncontrollable factor which varies due to change in weather/storm conditions/temperature/ outages of plants/ curtailments and other factors etc.

20. Petitioners have made bilateral contracts with certain generators. The Petitioners to submit the monthly details of the power procured from such bilateral contracts for FY 2020-21.

**Reply:**

It is humbly submitted that under Table E. Bilateral and Others (Power Purchased through Trading) of "F13 20\_21\_True up", the details of month wise bilateral purchase from NHPC,

  
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TATA/MPL/PSPCL, NVVN and PTC has been mentioned. This information was submitted to the Hon'ble Commission under Annexure 18 of Data Gap-1 dated 11.04.2022.

21. Petitioners have not claimed any addition in Grants for FY 2020-21. The Petitioners should submit the scheme-wise break-up and fund flow of Grants for RGGVY 11th Plan, DDUGJY, ADB, RAPDRP, IPDS, SAUBHAGYA YOJNA, etc. justifying that there was no addition in Grants for FY 2020-21.

**Reply:**

It is already provided to Hon'ble Commission under query nos. 16 of 2<sup>nd</sup> data gap submission on 22.04.2022 by Discom.

22. It is observed that the revised Power Purchase Expenses of Rs. 60,449.16 Crore submitted in the response to the Commission's queries does not match with the value as submitted in the Tariff Petition (Rs. 59,982.99 Crore) and value of Rs. 59,631.18 Crore as per the Audited Accounts of the State Discoms for FY 2020-21. The Petitioner to submit the details of the same as per the Audited Accounts of the State Discoms for FY 2020-21 along with the reconciliation.

**Reply:**

It is already provided to Hon'ble Commission under query no. 4 of 2<sup>nd</sup> data gap submission on 22.04.2022 by Licensee.

23. Petitioners should provide details of any OTS scheme implemented during FY 2018-19, FY 2019-20, FY 2020-21 along with the details of consumer Category-wise/ Subcategory-wise surcharge waived-off, rebate in revenue and revenue collected.

**Reply:**

It is humbly submitted that the information pertaining to OTS is being collected from various Divisional offices of Discoms.

24. It is observed that the Interest on Consumer Security Deposit as per the Audited Accounts is provisional. Petitioners to submit the details of the Interest on Consumer Security Deposit actually disbursed to the consumers for FY 2020-21.

**Reply:**

It is humbly submitted by the Petitioner that the Interest on Consumer Security as mentioned in the Audited Accounts for FY 2020-21 is the actual disbursement during the year is attached herewith as **Annexure-V**.

25. Petitioners to submit the details of penalties and compensation paid by the licensee for failure to meet standards of performance per the Regulations 41.1 of the UPERC SOP Regulations, 2019 for FY 2020-21. Submit the details of the efforts being taken to educate the consumes in this regard.

  
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**Reply:**

The Petitioner submits that the IT enabled system for penalties and compensation payable by the licensee for failure to meet standards of performance is under development and it is expected to be live in April 2022. As per Uttar Pradesh Electricity Regulatory Commission (Standard of Performance) Regulations, 2019 and Uttar Pradesh Supply Code, 2005 and its subsequent amendments, the "Manual of Practice for Handling Customer Complaints" was prepared in Hindi and English languages by Discom and is available for reference of consumer's awareness at HQs of Discoms and is also downloadable from its website i.e. [www.puvvnl.up.nic.in](http://www.puvvnl.up.nic.in) and the posters for consumer's awareness are available and displayed at various locations of Discoms as per GoI initiatives is attached herewith as **Annexure-VI**.

26. Petitioners to submit the maximum Peak Demand (Restricted and Unrestricted), Peak Availability Assessed, Shortfall in meeting Peak Demand as per Form P7 of MYT Distribution Tariff Regulations, 2019.

**Reply:**

It is submitted that Discom-wise details of maximum Peak Demand (Restricted and Unrestricted) is not available. However, the State level details for the same as available on the UPSLDC website is attached as **Annexure-VII** for kind consideration of the Hon'ble Commission.

27. Provide a list of all the accounting heads in your accounting / financial system.

**Reply:**

Detailed list of accounting heads is provided as **Annexure-VIII**.

**Additional submission(s): -**

It is humbly submitted that post technical validation session after 18.04.2022, there were certain discrepancies observed in the Billing Determinants. Hence, some rectification is being done by the Petitioner, it is further submitted that due to these changes, the gap of the Licensees is slightly changed. Accordingly, the revised ARR table and Billing determinants is attached herewith for kind consideration of the Hon'ble Commission.

**Revised ARR table for True-up FY 2020-21, APR FY 2021-22 and ARR FY 2022-23:PUVVNL**

| Sr. No. | Particulars                            | FY 2020-21 | FY 2021-22 | FY 2022-23 |
|---------|--|------------|------------|------------|
|         |  | True-up    | APR        | ARR        |
| 1       | Energy Delivered to Discom (MU)        | 27,604.01  | 27,398.30  | 27,494.71  |
| 2       | Sale of Power (MU)                     | 21,903.08  | 22,028.44  | 22,660.99  |
| 3       | Approved Distribution Loss (%)         | 11.83%     | 11.36%     | 10.93%     |
|         | Actual/Projected Distribution Loss (%) | 20.65%     | 19.60%     | 17.58%     |
| 4       | Intra-State Transmission Loss (%)      | 3.37%      | 3.33%      | 3.27%      |

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|           | Expenditure (Rs Crore)                                  |                   |                  |                   |
|-----------|---|-------------------|------------------|-------------------|
| 5         | Power Purchase Expenses including PGCIL charges         | 13,340.51         | 11,854.29        | 13,162.44         |
| 6         | Transmission Charges (UPPTCL)                           | 756.15            | 663.31           | 665.65            |
| 7         | Total O&M Expenses (net of capitalisation)              | 1,913.02          | 2,230.83         | 2,102.64          |
| 8         | Interest & Finance Charges (net of capitalisation)      | 849.56            | 841.57           | 863.78            |
| 9         | Depreciation  | 802.74            | 900.82           | 986.26            |
| 10        | Bad and Doubtful Debts                                  | 93.34             | 269.97           | 276.65            |
| <b>11</b> | <b>Gross Expenditure</b>                                | <b>17,755.33</b>  | <b>16,760.79</b> | <b>18,057.41</b>  |
| 12        | Return on Equity  | 573.82            | 654.59           | 727.67            |
| 13        | Less: Non-Tariff Income including DPS                   | 90.05             | 28.90            | 28.90             |
| 14        | Less: revenue from open access consumers                | -                 | -                | -                 |
| <b>15</b> | <b>Annual Revenue Requirement</b>                       | <b>18,239.10</b>  | <b>17,386.47</b> | <b>18,756.18</b>  |
| 16        | Revenue from Tariff                                     | 11,690.86         | 13,498.43        | 13,832.26         |
| 17        | GoUP Subsidy  | 2,454.25          | 2,969.05         | 3,413.33          |
| <b>18</b> | <b>Revenue (Gap)/Surplus</b>                            | <b>(4,093.99)</b> | <b>(918.99)</b>  | <b>(1,510.59)</b> |
| 19        | Power Purchase Cost at Discom Periphery (Rs./Unit)      | 4.83              | 4.33             | 4.79              |
| 20        | Average Power Purchase Rate (BST) (Rs/Unit)             |                   | 4.97             | 5.32              |
| 21        | DBST Rate (Rs/Unit)                                     |                   | 4.33             | 4.79              |
| 22        | ABR (Excluding Subsidy) Rs /Unit                        | 5.34              | 6.13             | 6.10              |
| 23        | Average Cost of Supply (Rs /Unit)                       | 8.33              | 7.89             | 8.28              |
| 24        | Wheeling Charges (Rs/Unit)                              |                   |                  | 1.29              |
| 25        | <b>Cross Subsidy Surcharge For FY 2022-23 (Rs./kWh)</b> |                   |                  |                   |
| A         | HV-1 (Supply at 11 kV)                                  |                   |                  | 1.97              |
| b         | HV-1 (Supply above 11 kV)                               |                   |                  | 3.04              |
| C         | HV-2 (Supply upto 11 kV)                                |                   |                  | 1.96              |
| d         | HV-2 (Supply above 11 kV & upto 66 kV)                  |                   |                  | 1.32              |
| E         | HV-2 (Supply above 66 kV & upto 132 kV)                 |                   |                  | 1.58              |
| f         | HV-2 (above 132 kV)                                     |                   |                  | 0.73              |
| g         | HV-3 (Supply at & above 132 kV )                        |                   |                  | 2.17              |
| h         | HV-3 (For Metro Traction)                               |                   |                  | 1.79              |
| I         | HV-4 (Supply at 11 kV)                                  |                   |                  | 1.75              |
| J         | HV-4 (Supply above 11 kV upto 66kV )                    |                   |                  | 1.85              |

  
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**Revised Billing Determinants for True-up FY 2020-21, APR FY 2021-22 and ARR FY 2022-23:PUVNL**

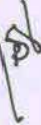
| Category  | Consumers  |            |            | Load (kW)  |             |             | Sales (MU) |            |            |
|---|------------|------------|------------|------------|-------------|-------------|------------|------------|------------|
|   | FY 2020-21 | FY 2021-22 | FY 2022-23 | FY 2020-21 | FY 2021-22  | FY 2022-23  | FY 2020-21 | FY 2021-22 | FY 2022-23 |
| LMV-1 Domestic light fan & power                        | 78,56,774  | 80,82,618  | 85,13,593  | 97,67,513  | 1,00,18,925 | 1,03,25,679 | 12,749     | 12,402     | 12,772     |
| LMV-2 Non domestic light fan & power                    | 4,49,005   | 4,70,572   | 4,93,801   | 12,18,249  | 12,67,850   | 13,30,219   | 1,890      | 2,005      | 2,077      |
| LMV-3 Public lamps                                      | 439        | 520        | 531        | 36,483     | 43,427      | 44,619      | 126        | 135        | 141        |
| LMV-4 Light, fan & power for public/private institution | 28,313     | 28,596     | 29,777     | 1,63,416   | 1,65,050    | 1,72,147    | 271        | 258        | 269        |
| LMV-5 Private tube well/pumping sets                    | 3,18,408   | 3,19,849   | 3,24,388   | 14,33,862  | 14,39,071   | 14,55,481   | 2,524      | 2,658      | 2,704      |
| LMV-6 Small & medium power upto 100 hp/75kw             | 31,054     | 31,482     | 32,665     | 3,50,930   | 3,56,331    | 3,70,881    | 573        | 572        | 596        |
| LMV-7 Public water works                                | 3,426      | 3,647      | 3,933      | 1,06,730   | 1,11,623    | 1,19,100    | 390        | 395        | 402        |
| LMV-8 State tube wells & pumps canal upto 100 hp        | 11,826     | 12,136     | 12,255     | 2,23,083   | 2,36,054    | 2,41,828    | 1,113      | 1,153      | 1,186      |
| LMV-9 Temporary supply                                  | 2,093      | 2,109      | 2,169      | 4,792      | 4,832       | 4,972       | 8          | 9          | 9          |
| LMV-10 Departmental employees                           | 24,995     | 25,495     | 26,005     | 87,418     | 89,166      | 90,950      | 105        | 107        | 109        |
| LMV-11 Electrical Vehicles                              | -          | 6          | 7          | -          | 24          | 26          | -          | 0          | 0          |
| HV-1 Non industrial bulk load                           | 894        | 940        | 987        | 2,55,500   | 2,68,476    | 2,82,112    | 411        | 507        | 511        |
| HV-2 Large & heavy power above 100 bhp (75 kw)          | 1,394      | 1,436      | 1,485      | 5,63,157   | 5,80,052    | 6,03,633    | 1,239      | 1,333      | 1,385      |
| HV-3 Railway traction                                   | 1          | 1          | 1          | 10,800     | 10,800      | 10,800      | 25         | 8          | 8          |
| HV-4 Lift irrigation & p. canal above 100 bhp (75kw)    | 57         | 58         | 58         | 1,29,134   | 1,30,425    | 1,31,730    | 476        | 486        | 491        |

  
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| Category             | Consumers        |                  |                  | Load (kW)          |                    |                    | Sales (MU)    |               |               |
|----------------------|------------------|------------------|------------------|--------------------|--------------------|--------------------|---------------|---------------|---------------|
|                      | FY 2020-21       | FY 2021-22       | FY 2022-23       | FY 2020-21         | FY 2021-22         | FY 2022-23         | FY 2020-21    | FY 2021-22    | FY 2022-23    |
| Bulk Supply          | -                | -                | -                | -                  | -                  | -                  | -             | -             | -             |
| Extra State Consumer | 1                | 1                | 1                | 410                | 410                | 410                | 3             | 3             | 3             |
| <b>Total</b>         | <b>87,28,680</b> | <b>89,79,465</b> | <b>94,41,657</b> | <b>1,43,51,477</b> | <b>1,47,22,516</b> | <b>1,51,84,586</b> | <b>21,903</b> | <b>22,028</b> | <b>22,661</b> |

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