



PURVANCHAL VIDYUT VITARAN NIGAM LTD.
PURVANCHAL VIDYUT BHAVAN,
VIDYUT NAGAR, P.O.-D.L.W.,
VARANASI-221004
E-Mail :- cecompuvvnl@gmail.com

No. 1977 /PuVVNL/Commercial/

Date: 3 .03.2023

To,

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

Sub: 3rd Information Requirement/Discrepancies/Data Gaps in the Petition No.1949 of 2023 dated 9th January, 2023 of True-Up (FY 2021-22), Annual Performance Review (FY 2022-23), Aggregate Revenue Requirement (FY 2023-24).

Ref: UPERC Email dated 22.02.2023

Dear Sir,

This is with reference to your above-mentioned letter directing submission of replies to 3rd Information Requirement/Discrepancies/Data Gaps in the Petition No. 1949 of 2023 dated 09th January, 2023 of True-Up (FY 2021-22), Annual Performance Review (FY 2022-23), Aggregate Revenue Requirement (FY 2023-24) 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 up-loaded in soft copies.

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

Yours Sincerely,


Rajendra Prasad
Director (Comm.)

CC:

1. Managing Director, PuVVNL Varanasi.
2. CE, RAU, UPPCL.

निदेशक (वाणिज्य)
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**Reply to 3rd Information Requirement / Discrepancies / Data Gaps in the
Petition Nos. 1949, - 2023 of PuVVNL
Dated:- March 03, 2023**

True-Up (FY 2021-22), Annual Performance Review (FY 2022-23), Aggregate Revenue Requirement (FY 2023-24)

1. Discom wise month wise billing derterminants (actual for FY 2021-22 & projected for FY 2023-23) for unmetered categories ie. LMV1: Domestic (Rural Schedule-Unmetered), LMV 2: Non-Domestic (Rural Schedule-Unmetered), LMV5: PTW-Rural Schedule (unmetered) and LMV 8: State Tube Wells/ Panchayati Raj Tubewells & Pumped Canal categories to be provided by the Petitioners in the following MS-Excellinked format (In FY 2023-24, the LMV 8 has been merged in LMV 7, thus for estimation of computation for unmetered consumers under LMV 7 category, the norms approved for LMV 8 shall remain applicable).

Name of Licensee:

Unmetered Category of Consumer:

Sr. No.	Particulars	Apr'XX	May'XX	Jun'XX	...	Mar'YY
1	Number of Consumers					
2	Connected Load (MW)					
3	Actual consumption/KVA/Month					
4	Power Factor					
5	Normative Consumption/ KW/Month					
6	Sales as per Norms (MU)					

Response:

It is submitted that Discoms are obligated to follow the normative consumptions approved by the Hon'ble Commission for the various unmetered consumer categories in its order dated 09.12.2016 under suo moto proceedings. It is hereby submitted that the norm specified by the Commission is considered for the estimation of energy sales to the unmetered consumer categories. Same is detailed under the revenue model submitted by the Petitioner along with the ARR for FY 2023-24. Therefore, the Hon'ble Commission is requested may kindly provide relaxation in this matter.

2. Discom-wise calculation for estimating consumer contribution for FY 2023-24 based on the number of consumers & connected load proposed at the rate of Cost Data Book shall be provided by the Petitioners in an MS-Excel linked format:

Name of Licensee:

Particulars	Line Charges Per Connection as per Cost Data Book (A)			Consumers (B)		Load (C)		Total
	Overhead	Underground	Avg.	Estimated addition in Consumers	Consumer Contribution	Estimated Addition in Load	Estimated Consumer Contribution	Consumer Contribution (Will be combined of A, B & C)
132 kV / 220								

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Particulars	Line Charges Per Connection as per Cost Data Book (A)			Consumers (B)		Load (C)		Total Consumer Contribution (Will be combined of A, B & C)
	Overhead	Underground	Avg.	Estimated addition in Consumers	Consumer Contribution	Estimated Addition in Load	Estimated Consumer Contribution	Rs Crore
	Rs.	Rs.	Rs.	No.	Rs. Crore	No.	Rs. Crore	Rs Crore
kV								
33kV Large Consumer								
33 kV								
11 kV								
LTCT with transformer								
3 Phase LT (Urban/Industry/Commercial)								
Single Phase LT (Urban/Commercial)								
3 Phase LT (Village)								
Single Phase LT (Village)								
Single Phase Prepaid Meter								
Three Phase Prepaid Meter								
Conversion of Single point to Multipoint								
New Societies Individual Connection								
Meter & CT Replacement etc.								
Total Consumer Contribution Projected (in Rs. Crores):								


Response:

It is hereby submitted that the estimation of consumer contribution can not be estimated as per the practice adopted by the Licensees. Further, the consumer contribution is dependent on the nature of work/type of release of connection etc. Therefore, the Licensee request Hon'ble Commission may kindly provide relaxation in this regard.

3. Discom-wise details of Interest on Consumer Security Deposit for FY 2021-22 to be provided by the Petitioner in MS-Excel linked format:

Name of Licensee:

Particular	Apr-21	May-21	...	Feb-22	Mar-22
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Particular	Apr-21	May-21	...	Feb-22	Mar-22
Opening Balance					
Addition during the month					
Deduction during the month					
Closing balance					
Interest Rate (%)					
Interest on Security Deposit to be disbursed by the Licensee as per Regulations					
Interest on Security Deposit actually disbursed to the Consumers					
Difference to be disbursed					

Response:

It is hereby submitted that the detailed information regarding the consumer security deposit as available with Licensee has already been provided under additional format. Same is again attached as Annexure-A.

4. Petitioners to provide the status of forward and reverse banking agreements executed in FY 2021-22 and planned for FY 2023-24 along with all the reference documents. Also, submit a table to show all Banking Agreements, their approval if any and the details of trading charges/margin, payment of transmission charges etc if any.

Response:

It is submitted that the banking details for FY 2021-22 has already provided to the Hon'ble Commission in response to the query 2.3.14 of data gap-1. Same is again attached at Annexure _G along with the document, for kind consideration of the Hon'ble Commission. In regard to banking arrangement for FY 2023-24, it is submitted that the Petitioner in its power purchase model has detailed the same. Same can be perceived under excel tab - "Total Baking MU_revised" of PP Model.

Petitioner hereby submits that the estimation of procurement of power through Deep Portal during FY 2023-24 is attached as Annexure-H for kind consideration of the Hon'ble Commission.

5. Discom-wise details of all four wheelers (brand of vehicles, year of purchase, purchase cost, present cost etc.) for FY 2021-22, FY 2022-22 & FY 2023-24 shall be provided by the Petitioners.

Response:

Vehicle details as desired by the Hon'ble Commission is not readily available, same has already been communicated to the Hon'ble Commission during the submission of additional format.

6. There is mismatch of sales of DF Agra provided in the Petition and that submitted in reply of 1st query. DVVNL to provide correct Billing Determinants of DF Agra for True Up, APR and ARR year. Otherwise, the difference will be proportionately adjusted so that the sales matches the audited figure.

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Response:

This query does not pertain to PuVVNL.

7. Petitioners to clarify that HV3 (Railway) has surrendered its all connections or not. Petitioners have submitted that Railway Traction has taken deemed licensee status – the Petitioners to confirm the same. Also, if that is the case then, whether the HV3-A category rate schedule is required at all?.

Response:

It is respectfully submitted that, as per the latest information, Petitioners do not have HV3 (Railway) consumers.

8. Petitioners have not considered revenue from 'HV2 Rural Schedule: Supply at 11 KV' for computation of CSS for HV-2 (Supply at 11 kV). Petitioners to submit clarification in this regard.

Response:

It is submitted that due to inadvertent excel linking the HV-2 Rural Schedule revenue were not incorporated in CSS computation, however, the same has now been rectified the revised CSS at proposed Tariff excel sheet is attached at Annexure-B.

9. Petitioners have submitted CSS computation considering revenue at existing Tariff, the computation of CSS considering revenue at proposed Tariff to be provided by the Petitioners. As the Petitioners will be publishing the proposed Tariff in newspaper, the CSS at the proposed Tariff should also be published, however if they want their existing submission to be considered, the Petitioners need to confirm the same.

Response:

CSS computation considering revenue at proposed Tariff is enclosed at Annexure-B.

10. In response to the Commission's query, Assets addition during the year (Capitalization) for MVVNL is Rs. 4,212.00 Crores against Rs. 4,509.00 Crores given in Audited Accounts of FY 2021-22. Petitioner has submitted that some assets made in work circles are not routed through CWIP. In this regard, Petitioner to confirm which number to be used and justify the same, otherwise Rs. 4,212.00 Crores will be considered.

Response:

This query does not pertain to PuVVNL.

11. Petitioners have provided only consolidated revenue at proposed Tariff. Petitioners should provide Discom wise & consolidated revenue at proposed Tariff for FY 2023-24 along with linked MS Excel models.

Response:

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Discom wise & consolidated revenue at proposed Tariff for FY 2023-24 along with linked MS Excel models is attached at Annexure-D.

12. Plant-wise data such as power purchase quantity, capacity charges and energy charges provided for the 'Consolidated categories' in station wise Power Purchase statement for FY 2021-22 for UPRVUNL consolidated, UPJVNL consolidated, NTPC consolidated, NHPC consolidated, THDC Consolidated & SJVNL Consolidated in response to the first Deficiency Note is not matching with the details initially submitted by the Petitioner in the ARR Petition for FY 2023-24. If not provided the lower of the two will be taken into consideration.

Response:

The reconciled MIS as desired by the Hon'ble Commission is attached at Annexure-C. It may be noted that the Bills of LPS, Statutory taxes etc. are being raised by NTPC/NHPC etc on consolidated basis, therefore, the same cannot be allocated plant wise.

13. The energy sales in DBST Calculation submitted by the Petitioner in response to the 1st Deficiency Note is not matching with the energy sales (Discom wise and consolidated) claimed for FY 2021-22. Justification to be provided for the same otherwise the audited figures will be considered.

Response:

It is submitted that Petitioner in its submission under Annexure of DBST has mentioned a note that Revenue Assessment, Energy Sales and Expenditures including intra State Transmission, O&M, Interest, Dep, etc have been considered as per the Audited Balance Sheet for FY 2020-21. It is due to the fact that for finalization of the audited account of FY 2021-22 power purchase cost is required to be allocated to the Discom on the basis of audited data. Further, it is to be noted that this exercise is being done for the compilation of data for audit purpose, therefore Petitioners are bound to allocate BST for calculation of DBST at available audited data of FY 2020-21.

14. Petitioners to reconcile the difference in power purchase cost claimed for True Up year and shown by the UPPCL in their Audited Accounts in their audited accounts for FY 2021-22. The Note number having reference for this cost shall also be provided.

Response:

The note no. of the adjustments, as provided in the data Gap-1, is as under: -

F	Adjustments in the books of UPPCL		Balance sheet Note no.
1)	Prior Period Power Purchase (AG 83.1 Net)	37,373.87	Note - 30 point no 10 at document page no 61 of UPPCL Balance sheet.
2)	Prior Period (HQ Enteries)	531.13	
3)	Un-billed Power Sale of 2020-21 (HQ Enteries) (AG 23.42)	66,326.99	Note-8 document page no 40 of UPPCL Balance Sheet.
4)	Difference between HQ & Audited (Un-billed)	2,147.98	
	Total Adjustments in the books of UPPCL (1+2+3+4)	1,06,379.97	

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15. Petitioners to provide the total amount of rebate collected & LPS paid in power purchase during year for FY 2021-22, if not provided then it will be assumed that all positive entries will be considered as rebate and all negative values as LPS.

Response:

The details of Rebate collected and LPS are enclosed at Annexure E.

16. Petitioners to provide current upto date status of compliance of UPERC (Consumer Grievance Redressal Forum) Regulations, 2022.

Response:

The Discoms has published advertisements regarding various vacancies as per the UPERC (Consumer Grievance Redressal Forum) Regulations, 2022. Further, due to less response (for PuVVNL only seven application received) from stakeholders, the date for the application has been extended to 25 March 2023. The updated status of response received and the advertisement issued by the Discom is attached as Annexure-F.

17. Petitioners to provide current upto date status of compliance of UPERC (Standards of Performance) Regulations, 2019.

Response:

For the implementation of UPERC (Standards of Performance) Regulations, 2019, Software is under final stage of testing. Discom is in the process of implementation of various module of compensation, performance monitoring etc.

18. KESCO to provide Interest on Consumer Security Deposit paid in actual to the consumers as it has not submitted the same in the reply of deficiency dated February 14, 2023, otherwise zero amount will be considered.

Response: This query does not pertain to PuVVNL.

19. DVVNL to provide Cost Audit Report for FY 2021-22.

Response: This query does not pertain to PuVVNL.

20. MVVNL to provided Energy Audit Report for FY 2021-22.

Response: This query does not pertain to PuVVNL.

21. Petitioners to provide Discom-wise & consolidated, Billing Determinants in rationalised tariff structure for FY 2022-23.

Response:

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It is submitted that Petitioner has submitted discom wise billing determinants as per the tariff category/sub category /slabs approved by the Hon'ble Commission in its Tariff Order for FY 2022-23. It is further submitted the applicability of Tariff Order was not for the full year of FY 2022-23, therefore, the billing determinants for the year can not be acerrtained in rationalized tariff structure. However, as per the Tariff applicability the billing determinants for FY 2023-24 is proposed as per the revised tariff schedule of Hon'ble Commission.

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