

**Response:**

Project/Plant	Variable Charge (VC) and Fixed Charge (FC) Details
Panki Extension, Obra C, Jawaharpur	Detailed in <b>Annexure-B</b>
PARBATI-II, SUBANSIRI LOWER, KHURJA STPP, Ghatampur	Projections based on an EC and FC of Rs 2.5 per unit
Solar Power (FY 24 and FY 25)	Variable Charge (VC) of Rs 3 per unit
Wind Power	VC of Rs 2.98 per unit (True Up year rate)
Slop-based Power Project	VC of Rs 1.44 per unit
Hydro Projects (competitive bidding)	VC of Rs 2.72 per unit (FY 2022-23 True Up year) for projections

14. It is observed that the Petitioner has claimed Fixed cost of Rs. 363.73 Crore for TRN ENERGY (PTC) in FY 2022-23. Further, during the APR of FY 2023-24, petitioner has considered Annual Fixed cost of Rs. 376.22 Crore for TRN ENERGY (PTC). However, during the projection of power purchase for FY 2024-25, has considered Fixed Cost of Rs. 296.62 Crore. Petitioner, in this regard to provide justification for such variation in fixed cost projection of TRN ENERGY (PTC).

**Response:**

The fixed charges have been computed based on the average availability of last 5 years which is around 53% due to which the petitioner has projected the lower fixed cost. The Commission is requested to kindly consider the same.

15. Average Energy Charge of HARDUAGANJ EXT. Stage II for FY 2022-23 is Rs. 2.73/kWh. Further, while projection of power purchase for FY 2023-24 & FY 2024-25, petitioner has considered Energy charge of Rs. 4.77 /kWh & Rs. 5.03/kWh in Format 13B, respectively. Petitioner, in this regard to provide justification for considering sudden growth in Energy Charges.

**Response:**

Petitioner while estimating the variable charges for Harduaganj extension State II has considered established variable charges as recorded for True up year for Harduaganj Extension. Accordingly, the variable charges for FY 2023-24 and FY 2024-25 has been estimated Rs. 4.77 /kWh & Rs. 5.03/kWh respectively.

16. Petitioner to provide the detail of unit received from roof top solar. Petitioner to further provide clarification that, under which head the unit received from rooftop solar are shown. Explain how the accounting of Net metering had been done.

**Response:** Since the units from household rooftop solar panels are netted off against individual premises' unit sales, the petitioner's sales projections are based on these net-off solar units. This adjustment forms the basis for estimating the power purchase requirements for the upcoming years.

17. Petitioner has claimed power purchase of Rs. 68311.06 Crore. Further, Sales to Power to Discoms (as per Note -8 of UPPCL Balance Sheet) are not matching with the Power purchase cost as shown by the DISCOMs in their balance sheet as shown in Table below. Petitioner to provide justification along with the reconciliation of Power Purchase. Petitioner to provide the detail of Rs. 11.59 Crore of adjustment amount as shown in UPPCL Balance Sheet.

	Power Purchase as per UPPCL Balance Sheet	Power Purchase as per DISCOM Balance Sheet	Difference
DVVNL	14572.40	14492.63	79.77
MVVNL	15763.64	15677.33	86.31
PVVNL	20638.13	20525.14	112.99
PuVVNL	15319.77	15235.9	83.87
KESCO	2371.58	2358.59	12.99
Adj.	-11.59	0	-11.59
	<b>68653.93</b>	<b>68289.59</b>	<b>364.34</b>

**Response:**

It is submitted that the reconciliation has already been submitted in Data Gap 2. However, the reply is being resubmitted as under:

It is submitted that the Commission had directed the Petitioner to reconcile power purchase as per audited accounts of discom Vis-à-vis Note 22 of Audited accounts of UPPCL. In this regard it is submitted that the Commission has considered Transmission charges under power purchase from UPPCL, for instance the breakup of Transmission charge and Power purchase from UPPCL is provided under Note-21 of Audited balance sheet of PVVNL.

In light of above the reconciliation of each power component of power purchase claimed in the Petition with the audited accounts of Petitioner and UPPCL is as follows:

**Table-1**

RECONCILIATION OF POWER PURCHASE OF DISCOMS AND UPPCL							
Rs. In Crores							
	PARTICULARS	DVVNL	MVVNL	PVVNL	PuVVNL	KESCO	TOTAL
A	Purchase as per DISCOM's Balance Sheet as on 31.03.2023	14,492.63	15,677.33	20,525.14	15,235.90	2,358.59	68,289.59
B	Sale as per UPPCL's Balance Sheet as on 31.03.2023	14,572.40	15,763.64	20,638.13	15,319.77	2,371.58	68,665.52
C	Adjustments as per UPPCL's Balance Sheet as on 31.03.2023 (Start-up sale to M/s Neyveli Uttar Pradesh Power Ltd.)						-11.59
D	Net Sale as per UPPCL's Balance Sheet as on 31.03.2023 (B+C)	14,572.40	15,763.64	20,638.13	15,319.77	2,371.58	68,653.93
E	Difference between Discom's Purchase and UPPCL's Sale (A-D)	-79.77	-86.31	-112.99	-83.87	-12.99	-364.34
F	Adjustments in the books of UPPCL						
1)	Prior Period Expenses (AG 83.1 Net)	-					-355.06
2)	Start-up sale to M/s Neyveli Uttar Pradesh Power Ltd.						11.59
3)	Un-billed Power Sale of 2022-23 (AG 23.42)						-21.48
4)	Other Income related to Prior period (Subsidy Receivable IREDA (AG code 65.9))						0.61
	Total Adjustments in the books of UPPCL (1+2+3+4)	-	-	-	-	-	-364.34
G	Net Sale in the books of UPPCL after adjustments (E+F)						68,289.59

**Table-2**

RECONCILIATION OF POWER PURCHASE AS PER UPPCL BALANCE SHEET AND MIS FOR THE FY 2022-23					
S. No.	PARTICULARS	AS PER B/S	AS PER MIS	DIFFERENCE	
		(Rs. Crores)	(Rs. Crores)	(Rs. Crores)	
1	Power Purchase from Generators & Traders	61,805.10	61,744.46	60.64	

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24.06.2024 13:13

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2	Surcharge (LPS)	583.47	583.47	0.00
3	Unscheduled Inter Charges	-77.01	-77.01	-
4	Reactive Charges	9.12	9.12	-
5	Transmission Charges	6,846.55	6,907.19	-60.64
	<b>Gross Power Purchase (A)</b>	<b>69,167.23</b>	<b>69,167.23</b>	<b>0.00</b>
8	Rebate & Other Credits	237.87	237.87	-
9	Subsidy Receivable (IREDA & NEDA) (AG Code 63.140 & 63.150)	275.42	275.42	-
10	U.I. Charges Receivable (AG Code 62.803)			-
11	Reactive Charges Receivable (AG Code 62.804)			-
12	LPS Receivable (AG Code 62.805)			-
13	Subsidy Receivable (IREDA) (AG Code 65) - Prior Period			-
	<b>Total Rebate &amp; Other Credits (C)</b>	<b>513.29</b>	<b>513.29</b>	<b>-</b>
	<b>Net Power Purchase (A + B - C)</b>	<b>68,653.94</b>	<b>68,653.94</b>	<b>0.00</b>

Further, it is submitted that the Net Power Purchase after adjustments of prior period balance i.e. Rs (355.06) crore, Start-up sale to M/s Neyveli Uttar Pradesh Power Ltd i.e Rs. 11.59 crore and Subsidy Receivable (IREDA) (AG Code 65) - Prior Period i.e Rs. (0.61) crore, amount to Rs. 68,311.08 crore.

It is hereby submitted that the detailed working of the same was also clarified during the TVS discussions.

18. It is observed the Petitioner has projected power purchase of 5083 MUs in FY 2024-25, which is lower than the actual power purchase quantum from solar generating station in FY 2022-23. Petitioner to provide justification for lower Power Purchase Projection for solar plants.

**Response:** It may be noted that in projecting power from solar sources, the petitioner has used a reasonable CUF of 19%. This figure is based on historical performance data of existing solar plants, encompassing both new and older installations. While new plants may initially have higher CUFs, over time, factors such as equipment degradation, maintenance needs, and environmental impacts typically reduce the CUF. Therefore, although the CUF for newer plants starts higher, it is assumed that it may decrease in upcoming year. Therefore, for its projections the petitioner has considered reasonable CUF of 19% for FY 23-24.

Following table depicts the trend of Solar Energy which seems to be in line with the petitioner submission.

FY 2022-23	FY 2023-24 (Provisional Accounts)	FY 2024-25 (Projections)	% var FY 24 w.r.t. FY 23	% var FY 25 w.r.t. FY 24
5518.02	5203.17	5083.18	-6%	-2%

19. In case of DVVNL, it was observed that there were certain items in Fixed Asset Register (FAR) for FY 2022-23 which are shown under head of "11/0.4 KV TRANSFORMER REPAIRED". The above is just an example. For all such item which are shown under repaired, Petitioner to provide the justification why the repair items are part of its FAR.

**Response:**

The query does not pertain to PVVNL.

20. In case of MVVNL, for "Faizabad", it has been found that certain heads such as 'typewriters', 'calculators', etc. quantity is shown as NIL, however the value of under such assets are appearing in FAR. Licensee to provide justification on all such assets in its FAR.

**Response:**

The query does not pertain to PVVNL.

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# **Annexure A**

**Billing Determinants for FY  
2023-24**

**of**

**PVVNL**

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**Annexure-A**

**Consumer categorywise actual billing determinants of FY 2023-24**

Consumer Category	Actual FY 2023-24	Actual Load (in KW) 2023-24	Actual Sales (in MU) 2023-24
LMV-1 (Domestic)	6309657	1,37,50,425	13495.01
LMV-2 (Commercial)	582386	17,46,177	2,205.89
LMV-3 (Public Lamps)	6659	53,038	365.48
LMV-4 (Public and Private Institutions)	47293	1,97,881	245.19
LMV-5 (Small Private Tube well)	505875	32,17,454	6,923.32
LMV-6 (Small Industries)	72,357.00	9,96,284	1,411.45
LMV-7 (Public water works) and LMV-8 (State tubewells)	10,854.00	2,61,150	533.65
LMV-9 (Temporary Connections)	8,603.00	76,290	202.11
LMV-11 (ELECTRIC VEHICLE CHARGING)	953	14,949	23.12
HV-1 (Non-Industrial Bulk Load)	2,804.00	11,39,618	2,034.72
HV-2 (Large & Heavy Industries)	6,934.00	25,43,156	6,583.77
HV-3 (Railway traction)	6	42,300	107.88
HV-4 (Medium & large pumped canals)	4	1,098	1.32
<b>Total</b>	<b>75,54,385</b>	<b>2,40,39,820</b>	<b>34,132.91</b>

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