



DELHI ELECTRICITY REGULATORY COMMISSION

Vinayak Bhawan, 'C' Block, Shivalik, Malviya Nagar, New Delhi-110017.

F.11(1663)/DERC/2018-19/

Petition No. 12/2019

In the matter of: **Petition for fixing up of tariff for FY 2017-18 and determination of ARR for the Financial Year 2019-20 for PPS-I.**

Pragati Power Corporation Ltd.
Through its : Director (Tech.)
Himadri, Rajghat Power House Complex
New Delhi 110 002

...Petitioner/Licensee

Coram:

Hon'ble Mr. Justice S S Chauhan, Chairperson

ORDER

(Date of Order:31.07.2019)

M/s Pragati Power Corporation Ltd. [PPCL] has filed the instant Petition for fixing up of tariff for FY 2017-18 and determination of ARR for the Financial Year 2019-20 for PPS-I. The Petition was admitted by the Commission vide Order dated 21.02.2019. The Petition along with Executive summary was uploaded on the website of the Commission and publicised through advertisement in newspapers for seeking response of the stakeholders.

The comments and suggestions of the stakeholders including the submissions made during the public hearing held on 10.07.2019 and the arguments advanced by the Petitioner have been duly considered by the Commission.

In exercise of the power vested in it by the Electricity Act, 2003 and Delhi Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff) Regulations, 2017, the Commission hereby pass this Tariff Order signed, dated and issued on 31.07.2019.

The Petitioner shall take immediate steps to implement this Tariff Order, so as to make the revised tariffs applicable from 01.08.2019.

This Tariff Order shall remain in force till replaced by a subsequent Tariff Order and/or is amended, reviewed or modified, in accordance with the provisions of the Electricity Act, 2003 and the Regulations made there under.


(Justice S S Chauhan)

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LIST OF ABBREVIATIONS

Abbreviation	Explanation
ARR	Aggregate Revenue Requirement
A&G	Administrative and General
AAD	Advance Against Depreciation
ABT	Availability Based Tariff
ACD	Advance Consumption Deposit
AMR	Automated Meter Reading
APDRP	Accelerated Power Development and Reforms Program
AT&C	Aggregate Technical and Commercial
ATE	Appellate Tribunal for Electricity
BEST	Birhanmumbai Electric Supply and Transport
BHEL	Bharat Heavy Electricals Limited
BIS	Bureau of Indian Standards
BPTA	Bulk Power Transmission Agreement
BRPL	BSES Rajdhani Power Limited
BST	Bulk Supply Tariff
BTPS	Badarpur Thermal Power Station
BYPL	BSES Yamuna Power Limited
CAGR	Compounded Annual Growth Rate
CCGT	Combined Cycle Gas Turbine
CEA	Central Electricity Authority
CERC	Central Electricity Regulatory Commission
CFL	Compact Fluorescent Lamp
CGHS	Cooperative Group Housing Societies
CGS	Central Generating Stations
CIC	Central Information Commission
CISF	Central Industrial Security Force
CoS	Cost of Supply
CPI	Consumer Price Index
CPRI	Central Power Research Institute
CPSUs	Central Power Sector Utilities
CSGS	Central Sector Generating Stations
CWIP	Capital Work in Progress
DA	Dearness Allowance
DDA	Delhi Development Authority
DERA	Delhi Electricity Reform Act
DERC	Delhi Electricity Regulatory Commission
DIAL	Delhi International Airport Limited
DISCOMs	Distribution Companies (BRPL, BYPL, TPDDL & NDMC)

Abbreviation	Explanation
DMRC	Delhi Metro Rail Corporation
DPCL	Delhi Power Company Limited
DTL	Delhi Transco Limited
DVB	Delhi Vidyut Board
DVC	Damodar Valley Corporation
EHV	Extra High Voltage
EPS	Electric Power Survey
FBT	Fringe Benefit Tax
FPA	Fuel Price Adjustment
GFA	Gross Fixed Assets
GIS	Geographical Information System
GoNCTD	Government of National Capital Territory of Delhi
GTPS	Gas Turbine Power Station
HEP	Hydro Electric Power
HPSEB	Himachal Pradesh State Electricity Board
HRA	House Rent Allowance
HT	High Tension
HVDS	High Voltage Distribution System
IDC	Interest During Construction
IGI Airport	Indira Gandhi International Airport
IPGCL	Indraprastha Power Generation Company Limited
JJ Cluster	Jhuggi Jhopadi Cluster
KSEB	Kerala State Electricity Board
LED	Light Emitting Diode
LIP	Large Industrial Power
LT	Low Tension
LVDS	Low Voltage Distribution System
MCD	Municipal Corporation of Delhi
MES	Military Engineering Service
MLHT	Mixed Load High Tension
MMC	Monthly Minimum Charge
MoP	Ministry of Power
MTNL	Mahanagar Telephone Nigam Limited
MU	Million Units
MYT	Multi Year Tariff
NABL	National Accreditation Board for Testing and Calibration of Laboratories
NAPS	Narora Atomic Power Station
NCT	National Capital Territory
NCTPS	National Capital Thermal Power Station

Abbreviation	Explanation
NDLT	Non Domestic Low Tension
NDMC	New Delhi Municipal Council
NEP	National Electricity Policy
NGO	Non Government Organisation
NHPC	National Hydroelectric Power Corporation
NPCIL	Nuclear Power Corporation of India Limited
NRPC	Northern Regional Power Committee
NTI	Non Tariff Income
NTP	National Tariff Policy
O&M	Operations and Maintenance
OCFA	Original Cost of Fixed Assets
PGCIL	Power Grid Corporation of India
PLF	Plant Load Factor
PLR	Prime Lending Rate
PPA	Power Purchase Agreement / Power Purchase Adjustment
PPCL	Pragati Power Corporation Limited
PTC	Power Trading Corporation
PWD	Public Works Department
R&M	Repair and Maintenance
RAPS	Rajasthan Atomic Power Station
REA	Regional Energy Account
RoCE	Return on Capital Employed
ROE	Return on Equity
RRB	Regulated Rate Base
RTI	Right to Information
RWA	Resident Welfare Associations
SBI	State Bank of India
SERC	State Electricity Regulatory Commission
SIP	Small Industrial Power
SJVNL	Satluj Jal Vidyut Nigam Limited
SLDC	State Load Despatch Centre
SPD	Single Point Delivery
SPUs	State Power Utilities
SVRS	Special Voluntary Retirement Scheme
THDC	Tehri Hydro Development Corporation
ToD	Time of Day
TOWMCL	Timarpur Okhla Waste Management Company (P) Limited
TPDDL	Tata Power Delhi Distribution Limited
TPS	Thermal Power Station

Abbreviation	Explanation
UI	Unscheduled Interchange
UoM	Units of Measurement
WACC	Weighted Average Cost of Capital
WC	Working Capital
WPI	Wholesale Price Index

A1: INTRODUCTION

1.1 This Order relates to the petition filed by Pragati Power Corporation Limited (hereinafter referred to as “PPCL” or the “Petitioner”) for True-up of expenses for FY 2017-18 for Generation Business in terms of Delhi Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff) Regulations, 2017 (hereinafter referred to as 'Tariff Regulations, 2017') and Delhi Electricity Regulatory Commission (Business Plan) Regulations, 2017 (hereinafter referred to as 'Business Plan Regulations, 2017') and approval of Aggregate Revenue Requirement & Tariff for FY 2019-20 in terms of Tariff Regulations, 2017 and Business Plan Regulations, 2017.

PRAGATI POWER CORPORATION LIMITED

1.2 PPCL, wholly owned by the Government of National Capital Territory of Delhi, is a generating company which operates the Pragati Power Station-I (330 MW) power generating station, having two gas turbine units of 104 MW each and one steam turbine unit of 122 MW.

DELHI ELECTRICITY REGULATORY COMMISSION

1.3 Delhi Electricity Regulatory Commission (hereinafter referred to as ‘DERC’ or the ‘Commission’) was constituted by the GoNCTD on 03.03.1999 and it became operational from 10.12.1999.

1.4 The Commission’s approach to regulation is driven by the Electricity Act, 2003, the National Electricity Plan, the Tariff Policy and the Delhi Electricity Reform Act 2000 (hereinafter referred to as ‘DERA’). The Electricity Act, 2003 mandates the Commission to take measures conducive to the development and management of the electricity industry in an efficient, economic and competitive manner, which inter-alia includes Tariff determination.

THE STATE ADVISORY COMMITTEE MEETING

- 1.5 The Commission has, since constitution of the State Advisory Committee on 27/03/2003, held 18 meetings so far. In the 18th State Advisory Committee meeting held on 02/07/2019, the Commission discussed the following:

Table 1: Issues discussed in 18th State Advisory Committee Meeting

S. No.	Issues Discussed
I	Tariff Petitions for True Up of FY 2017-18 and ARR for FY 2019-20 for GENCOs, TRANSCO and DISCOMs
II	Draft DERC (Power System Development Fund) Regulations, 2019
III	DERC (Supply Code and Performance Standards) (Second, third & fourth Amendment) Regulations, 2018 & Manual of practice for handling consumers' complaints.

MULTI YEAR TARIFF REGULATIONS

- 1.6 The Commission issued Tariff Regulations, 2017 vide gazette notification dated 31.01.2017 specifying Terms and Conditions for Determination of Tariff for Generation of electricity under the Multi Year Tariff (MYT) framework. Further the operational norms for Generation utilities have also been approved by the Commission in Business Plan Regulations, under Tariff Regulations, 2017 for the period FY 2017-18 to FY 2019-20.
- 1.7 The Commission issued 'MYT Generation Regulations, 2011' vide Order dated 02.12.2011 specifying Terms and Conditions for Determination of Tariff for Generation of electricity under the Multi Year Tariff (MYT) framework for the period FY 2012-13 to FY 2014-15.
- 1.8 The Commission vide order dated October 22, 2014 has extended the control period of FY 2012-13 to FY 2014-15 for a further period of one year till FY 2015-16.
- 1.9 The Commission has extended the applicability of MYT Generation Regulations, 2011 for FY 2016-17 in Tariff Regulations, 2017.

FILING OF PETITION FOR TRUE-UP OF FY 2017-18 AND ARR FOR FY 2019-20**FILING AND ACCEPTANCE OF PETITION**

- 1.10 PPCL has filed its petition before the Commission on 26.12.2018 for True Up of expenses for FY 2017-18 and Annual Revenue Requirement of FY 2019-20.
- 1.11 The Commission admitted the petition vide its Order dated 21.02.2019 for True Up and Tariff Determination subject to clarifications/ additional information, if any, which would be sought from the Petitioner from time to time. A copy of the Admission Order dated 21.02.2019 is enclosed as Annexure I to this Order.

INTERACTION WITH THE PETITIONER

- 1.12 The Order has referred at numerous places to various actions taken by the “Commission”. It may be mentioned for the sake of clarity, that the term “Commission” in most of the cases refers to the Officers of the Commission for carrying out the due diligence on the petition filed by the Petitioner, obtaining and analyzing information/clarifications received from the Petitioner and submitting all issues for consideration by the Commission.
- 1.13 For this purpose, the Commission’s Officers held discussions with the Petitioner, obtained information/clarifications wherever required and carried out technical validation with regard to the information provided.
- 1.14 The Commission held public hearing on 10.07.2019 to take a final view with respect to various issues concerning the principles and guidelines for tariff determination. The Commission has considered due diligence conducted by the Officers of the Commission in arriving at its final decision. The use of the term “Commission” may, therefore, be read in the context of the above clarification.
- 1.15 A preliminary scrutiny/analysis of the petition submitted by the Petitioner was conducted and certain deficiencies were observed and the same was conveyed to the Petitioner. Further, additional information/clarifications were solicited from the Petitioner as and when required. The Commission and the Petitioner also discussed key issues raised in the petition, which included details of O&M Expenses, Assets

Capitalization, Depreciation, Working Capital Requirement, Return on Capital Employed (RoCE) etc. The Petitioner submitted additional information through various letters/ Emails.

- 1.16 The Commission also conducted multiple validation sessions with the Petitioner during which discrepancies in the petition and additional information required by the Commission were sought. Subsequently, the Petitioner submitted replies to the issues raised in these sessions and provided documentary evidence to substantiate its claims regarding various submissions.

PUBLIC NOTICE

- 1.17 The Commission published a Public Notice on its website and in the following newspapers on 07.03.2019 inviting comments from stakeholders on the Tariff petitions filed by the Petitioner by 05.04.2019:

Hindustan Times (English)	:	07.03.2019
The Pioneer (English)	:	07.03.2019
Times of India (English)	:	07.03.2019
Navbharat Times (Hindi)	:	07.03.2019
Dainik Jagran (Hindi)	:	07.03.2019
Roznama Rashtriya Sahara (Urdu)	:	07.03.2019
Educator (Punjabi)	:	07.03.2019

- 1.18 The copies of above Public Notices are available on Commission's website (www.derc.gov.in)

- 1.19 The Petitioner also published a Public Notice indicating salient features of its petition for inviting comments from the stakeholders and requesting to submit response on the petition on or before 10.07.2019 in the following newspapers on the respective dates mentioned alongside:

(a) Indian Express (English)	:	11.06.2019
(b) Business Standard (English)	:	11.06.2019
(c) The Daily Milap (Urdu)	:	11.06.2019
(d) Dainik Jagran (Hindi)	:	11.06.2019
(e) Daily Educator (Punjabi)	:	11.06.2019

- 1.20 The copies of above Public Notices are available on Commission's website (www.derc.gov.in)
- 1.21 A soft copy of the petition was made available in CD on payment of Rs. 25/- per CD or a copy of the petition was also made available for purchase from the PPCL office on working day till 10.07.2019 between 11 A.M. and 4 P.M. on payment of Rs.100/- either by cash or by demand draft/pay order . A copy of the complete petition was also uploaded on the website of the Commission, as well as that of the Petitioner, requesting for comments of the stakeholders thereon.
- 1.22 At the request of the stakeholders, the Commission extended the last date for filing objections and suggestions up to 10/07/2019 for which the public notice was issued in the following newspapers on the respective dates mentioned along side:
- | | | | |
|-----|---------------------------|---|------------|
| (a) | Hindustan Times (English) | : | 07/06/2019 |
| (b) | Times of India (English) | : | 07/06/2019 |
| (c) | Mail Today (English) | : | 07/06/2019 |
| (d) | The Hindu (English) | : | 07/06/2019 |
| (e) | Navbharat Times (Hindi) | : | 07/06/2019 |
| (f) | Punjab Kesari (Hindi) | : | 07/06/2019 |
| (g) | Dainik Jagran (Hindi) | : | 07/06/2019 |
| (h) | Jadid-In Dinon (Urdu) | : | 07/06/2019 |
| (i) | Qaumi Patrika (Punjabi) | : | 07/06/2019 |
- 1.23 The Public Notice is available on Commission's website www.derc.gov.in
- 1.24 In order to extend help to the stakeholders in understanding the ARR Petition and filing their comments, the Commission prepared an Executive Summary highlighting salient features of the Tariff Petition filed by the Petitioner, which was uploaded on the Commission's website. In this regard, four officers of the Commission viz. Joint Director (PS&E), Joint Director (Engineering), Deputy Director (TA-FA) and Deputy Director (T-E) were nominated for discussion on the ARR Petitions. This was duly highlighted in the Public Notices published by the Commission.
- 1.25 Further, the Commission published a Public Notice indicating the venue, date and time of public hearing held on 10.07.2019 in the following newspapers on the respective

dates mentioned alongside:

(a)	Hindustan Times (English)	:	07/06/2019
(b)	Times of India (English)	:	07/06/2019
(c)	Mail Today (English)	:	07/06/2019
(d)	The Hindu (English)	:	07/06/2019
(e)	Navbharat Times (Hindi)	:	07/06/2019
(f)	Punjab Kesari (Hindi)	:	07/06/2019
(g)	Dainik Jagran (Hindi)	:	07/06/2019
(h)	Jadid-In Dinon (Urdu)	:	07/06/2019
(i)	Qaumi Patrika (Punjabi)	:	07/06/2019

- 1.26 The copies of above Public Notices are available on Commission's website (www.derc.gov.in).
- 1.27 The Commission received written comments from stakeholders. The comments of the stakeholders were also forwarded to the Petitioner who, responded to the comments of the stakeholders with a copy of its replies to the Commission. The Commission invited all stakeholders, including those who had filed their objections and suggestions, to attend the Public Hearing.
- 1.28 The public hearing was held at the Auditorium of Scope Convention Centre, Scope Complex, New Delhi for all stakeholders on 10.07.2019 to discuss the issues related to the petition filed by the Petitioner. The issues and concerns voiced by various stakeholders have been examined by the Commission. The major issues discussed during the public hearing and/or written comments made by the stakeholders, the responses of the Petitioner thereon and the views of the Commission, have been summarized in Chapter A2.

LAYOUT OF THE ORDER

- 1.29 This Order is organised into five Chapters:
- Chapter A1 provides the approach of the Order;
 - Chapter A2 provides a brief comments of various stakeholders including comments during the Public Hearing, the Petitioner's response and views of the Commission

thereon;

- (c) Chapter A3 provides analysis of truing up for FY 2017-18 for PPS-I Station;
- (d) Chapter A4 provides determination of tariff for FY 2019-20 for PPS-I Station;
- (e) Chapter A5 provides summary of all the directives issued by the Commission in this Order.

1.30 The Order contains following Annexure, which are an integral part of the Tariff Order:

- (a) Annexure I - Admission Order.
- (b) Annexure II - List of the stakeholders who submitted their comments on True-up of expense for FY 2017-18 and approval of Aggregate Revenue Requirement & Tariff for FY 2019-20.
- (c) Annexure III – List of Stakeholders/consumers who attended the public hearing.

APPROACH OF THE ORDER

APPROACH FOR FY 2017-18

1.31 The Commission in its Business Plan Regulations, 2017 has indicated that Regulations shall remain in force for a period of three (3) years. The relevant Regulation of Business Plan Regulations, 2017, in this regard, is as follows:

“1(2) These Regulations, shall remain in force for a period of 3 (three) years i.e., for FY 2017-18, FY2018-19 and FY 2019-20, unless reviewed earlier.”

1.32 The Commission in its Tariff Regulations, 2017 has specified that Regulations shall be deemed to have come into effect from 1st February, 2017. The Relevant Regulation of Tariff Regulations, 2017, in this regard, is as follows:

“(4) These Regulations shall be deemed to have come into force from 1st February, 2017 and shall remain in force till amended or repealed by the Commission. “

1.33 Accordingly, ARR for FY 2017-18 has been trued as per Tariff Regulations, 2017 and Business Plan Regulations, 2017.

APPROACH FOR FY 2019-20

1.34 The Commission vide notification dated January 31, 2017 issued Tariff Regulations,

2017. Further, the Commission has issued Business Plan Regulations, 2017.

- 1.35 The Commission has evaluated the ARR submitted by the Petitioner on the basis of the provisions of Tariff Regulations, 2017 read with Business Plan Regulations, 2017 and other factors considered appropriate by the Commission.

A2: RESPONSE FROM STAKEHOLDERS

- 2.1 Summary of objections/ suggestions from Stakeholders, response of the Petitioner (Pragati Power Corporation Limited) and Commission's view.

INTRODUCTION

- 2.2 Section 62 of the Electricity Act, 2003 mandates the Commission to determine the Generation Tariff after consideration of all suggestions received from the public and the response of the Petitioner to the objections/suggestions of stakeholders, issue a tariff order accepting the applications with such modifications or such conditions as may be specified in the order. Public Hearing, being a platform to understand the problems and concerns of various stakeholders, the Commission has encouraged transparent and participative approach in hearings to obtain necessary inputs required for tariff determination. Accordingly public hearing was held on 10th July, 2019 in SCOPE Convention Centre, SCOPE Complex, New Delhi.
- 2.3 In the Public Hearing, stakeholders put forth their comments/suggestions before the Commission in the presence of the Petitioner. The Petitioner was given an opportunity to respond to the comments put forth by the stakeholders.
- 2.4 The Commission has examined the issues and concerns voiced by various stakeholders in their written comments as well as in the Public hearing and also the response of the petitioner thereon.
- 2.5 The comments/ suggestions submitted by various stakeholders in response to the petition, the replies/ response given by the Petitioner and the view of the Commission are summarized below under various sub-heads.

Issue 1: Station Heat Rate (SHR)**Stakeholder's View**

- 2.6 The Petitioner has claimed Station Heat Rate for Combined Cycle as 1969 kcal/kWh and Open Cycle as 3176 kcal/kWh for FY 2017-18. Such relaxations are not justified at all as the new plants of similar configuration are all able to operate well within norms. The Petitioner has not been able to clarify technically why there should be any

exception in their case. Such relaxation will lead to increase in variable charges perennially affecting overall tariff to the retail consumer.

- 2.7 As per Delhi Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff) Regulations, 2017 and Delhi Electricity Regulatory Commission (Business Plan) Regulations, 2017, the approved Station Heat Rates are Combined Cycle-2000 kcal/kWh and Open Cycle-2900 kcal/kWh. Accordingly, the Commission is requested to consider ceiling Station Heat Rate as per Regulations or actual whichever is lower.
- 2.8 Further, the Petitioner has not given any monthly adjustment in line with Regulation 148 and 149 of Delhi Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff) Regulations, 2017.
- 2.9 The Petitioner has submitted that the Station runs in open cycle mode as and when requisitioned by SLDC. Thus, the actual heat rate is actual, as there is a direct loss on account of recovery of lesser fuel cost when operated in open cycle mode. The same is not accepted as this is very much controllable within Petitioner's operating abilities.
- 2.10 Further, CERC Tariff Regulations stipulate sharing of gain on achieving the SHR by 50:50.

Petitioner's Submission

- 2.11 Normative SHR may be achieved only when the scheduled generation of the plant is @ normative PLF i.e. 85% or in the case of continuous running of full module without frequent starts/stops and backing down. The Station was running at part load operation most of the time during the year and there were also frequent starts and stops of the machines resulting in higher Station Heat Rate both in combined cycle and open cycle mode. Therefore, the PLF of the plant has been very low i.e. 67.63% as compared to Annual Availability of 92.64%. Therefore, the Petitioner has requested to relax the norms for SHR in open cycle mode only.
- 2.12 Further as per Tariff Regulations, 2017 clause no 149

"the financial gain to a generating company or the transmission licensee, as the case may be, on account of operational parameters shall be shared in the ratio as specified by the commission in the Business Plan Regulations."

- 2.13 The SHR in combined cycle is lower than the normative SHR in combined cycle. But in Business Plan Regulations, 2017 of DERC the concept of such sharing has been dropped by the Commission.
- 2.14 Heat Rate in open cycle mode is controllable when the machine is allowed to be run on full load continuously and not on part load. Frequent starts and stops of machines as scheduled by SLDC on the request of DISCOM increases the SHR of machine due to increased percentage of operation in part load and open cycle.
- 2.15 The Petitioner plant is regulated by Tariff Regulations, 2017. Therefore, citing CERC Tariff Regulations is out of context.

Commission's View

- 2.16 The Commission has considered the SHR of the Petitioner Plant in open and combined cycle mode as per the provisions of Tariff Regulations, 2017 and Business Plan Regulations, 2017

Issue 2:Plant Availability Factor (PAF)

Stakeholder's View

- 2.17 Considering 1.1-1.2 MMSCMD gas availability on daily basis, the Petitioner plant can run up to 264 MW. Further, the plant is rarely scheduled beyond 50% of its installed capacity on account of high costs. Thus, the reason for contracting RLNG, Spot gas is not clear. Moreover, since the plant is rarely scheduled beyond 50% of its installed capacity resulting into accumulation of APM gas, which suggests that no contract for RLNG/Spot gas is required.

Petitioner's Submission

- 2.18 The actual contracted quantity has been provided time and again by the Petitioner at various occasions to DISCOMs. There is regular cut on the APM quantity of the gas. There has been never any occasion when even after the availability of APM gas generation has been done on costlier gas. The spot gas has been utilised only when there was schedule given by SLDC over and above generation possible on APM gas. The

Petitioner provides available generation from different gases and their rates to the DISCOMs on a day ahead basis.

Commission's View

- 2.19 The Petitioner must run the power plant on cheaper fuel before moving on to costlier fuel in order to cater to its scheduled generation.

Issue 3: Plant Load Factor (PLF)

Stakeholder's View

- 2.20 The Petitioner has claimed Plant Load Factor as 68% against DERC Norms of 85%.
- 2.21 The Petitioner is recovering the full Fixed Cost as allowed by DERC at 85% of the availability. Delhi DISCOMs are always paying the high variable cost on account of RLNG gas being used by generator. It is the duty of the generator to arrange the fuel at reasonable cost to earn the incentive. Hence the Petitioner's demand is unjustified.
- 2.22 Further, the Petitioner is requested to submit the timing of the Hot Gas Path Inspection

Petitioner's Submission

- 2.23 There is contract for sufficient amount of APM gas. However, as per directions of Ministry of Power, Govt. of India, priority and allotment of cheaper Domestic gas i.e APM, Non-APM & PMT has changed and Power sector has been placed at lower priority as compared to domestic, transport and fertilizer sector requirement. The Petitioner also ties up for RLNG gas to cope up with shortfall in cheaper domestic gas supply. The Petitioner is one of the few power plants with high efficiency in gas turbine category. Further the allegation of high ECR is baseless as the plants stand at favourable position as compared to many of the power plants from where Delhi DISCOMs schedule power.
- 2.24 As per the recommendation of OEM, the Hot Gas Path Inspection of the machine is carried out after 24000 running hrs. The equivalent running hours required for Hot Gas Path Inspection will also depend upon frequent starts/stops, part load operation and

number of emergency stops. Thus, increased number of abnormal operations results in reduced duration between maintenance intervals i.e. Hot Gas Path Inspection compared to normal running hours.

Commission's View

2.25 The Commission has considered the Plant Load Factor in line with the provisions of Tariff Regulations, 2017 and Business Plan Regulations, 2017

Issue 4: Auxiliary Consumption

Stakeholder's View

2.26 The Petitioner has claimed Auxiliary consumption of 2.39% against Normative 2.5% without bifurcating it into two parts (i.e Fixed & Variable). The Petitioner is requested to bifurcate the Auxiliary consumption into two parts and for the purpose of tariff fixation the auxiliary consumption limit would not be higher than the normative targets as specified in the Business Plan Regulations, 2017. Further, the target Auxiliary consumption of 2.5% is only the ceiling limit and the actual auxiliary consumption may be less than 2.5%. It is suggested to do periodic energy audit for auxiliary consumption by installing meters on UAT and station transformers to rule out any possibility of abuse of such auxiliary electricity.

2.27 Further, Double claim has been sought by the Petitioner on portion of fixed part of Auxiliary Consumption. The fixed part of Auxiliary Consumption of 0.5% has been included while computing net generation and also claimed fixed cost for the same as a part of ARR.

Petitioner's Submission

2.28 As per Business Plan Regulations, 2017, the auxiliary consumption has two parts i.e. 2% and 0.5% of gross generation. The 0.5% of gross generation is recoverable as part of fixed component of the tariff at the rate approved by DERC at the time of issue of tariff order for FY 2017-18. However in truing up due to change in fuel cost, the overall ECR for the year has been changed, therefore, amount of recovery of auxiliary consumption

against 0.5% of fixed part has also increased/changed. The Petitioner has calculated revised total amount of fixed part of auxiliary consumption. However additional amount recoverable will be difference of value submitted by IPGCL in present petition and already recovered during FY 2017 18.

- 2.29 Further, the normative APC may be achieved only when the schedule generation of the plant is @ normative NAPLF i.e. 85% or in the cases of continuous running of full module without frequent starts/stops and backing down. However as submitted in the petition, the station will consume of 2.5% of auxiliary energy or lesser only in case of optimum loading and continuous operation. However the station was running at part load operation most of the time during the year and there were also frequent start and stops of the machines resulting in higher APC.

Commission's View

- 2.30 The Commission has considered the auxiliary consumption as approved in the Business Plan Regulations, 2017

Issue 5: Weighted Average LPPF:

Stakeholder's View

- 2.31 The Petitioner has sought approval of higher LPPF impacting the ECR, actual is 17.628 Rs./SCM against 12.99 Rs/SCM considered by the Commission.
- 2.32 Spot-R-LNG was also procured which is expensive when compared to R-LNG, stating shortage of Gas. The Petitioner needs to relook at their procurement strategy and manage within the approved figures in the interest of consumers.

Petitioner's Submission

- 2.33 In this regard it is to submit that LPPF of Rs 12.99 Rs/SCM was approved by state commission in its tariff order dated 31.08.2017. However due to change in fuel prices during the period FY 2017-18 by GAIL the weighted average landed price for FY 2017-18 is Rs 17.628 Rs/SCM. It is to further submit that as per clause 103 of Tariff Regulations, 2017 the LPPF is weighted average landed price of primary fuel in Rs/Kg,

per litre or per standard cubic meter or as applicable during the month. The relevant provisions in clause 103 of Tariff Regulations, 2017 are reproduced as under:

“103. Energy charge rate (ECR) in Rupees per kWh on ex-power plant basis shall be determined to three decimal places in accordance with the following formulae:

(b) For gas and liquid fuel based stations $ECR = GHR \times LPPF \times 100 / \{CVPF \times (100 - AUX)\}$

Where, AUX = Normative auxiliary energy consumption in percentage

CVPF=(b) Weighted Average Gross calorific value of primary fuel as received, in kCal per kg, per litre or per standard cubic meter, as applicable for lignite, gas and liquid fuel based stations.

LPPF =Weighted average landed price of primary fuel, in Rupees per kg, per litre or per standard cubic metre, as applicable, during the month,

Thus LPPF is same as being paid to Gas Supplying supplier”.

- 2.34 Accordingly, the Petitioner has already ECR from DISCOMs in each bill. The details of the same are uploaded on monthly basis in Form-27 as per DERC Order. The advice to ensure management strategy for procurement of APM gas other than balance RLNG is irrelevant and ignores actual position of availability of cheaper domestic gas including APM.

Commission’s View

- 2.35 The Commission has considered the actual prices of the fuel in the relevant section of this Order as per the provisions of Tariff Regulations, 2017 and Business Plan Regulations, 2017.
- 2.36 The Petitioner must run the power plant of cheaper fuel before moving on to costlier fuel in order to cater to its scheduled generation.

Issue 6: Energy Charge Rate:

Stakeholder's View

TPDDL

2.37 The Petitioner has sought approval of 3.80 Rs./unit against 2.787 Rs./unit which is higher than the approved ECR. This is leading to higher cost of power purchase procurement. The Petitioner needs to relook at their procurement strategy and manage within the approved figures.

Petitioner's Submission

2.38 These issues were raised earlier also vide various letters addressed to Secretary (Power) and Director (T) of the Petitioner Company. The reply of the same has already been submitted with all facts and figures.

2.39 Further, the Petitioner is seamlessly trying to get allocated cheaper domestic gas to its power stations. However, in the overall interest of consumers of Delhi any such arrangement of additional gas/stoppage of daily cuts are being allowed only in case of new and highly efficient gas turbine power plants.

Commission's View

2.40 ECR is determined in the Tariff Order based on the prices of fuel during the applicable period as per the provisions of Tariff Regulations, 2017 and Business Plan Regulations, 2017 and the same is subject to change during the course of time. The Commission has appropriately considered the prices of the fuel in the relevant section of this Order.

Issue 7: O&M expenses**Stakeholder's View**

2.41 The Petitioner sought Rs.89.17 Cr for FY 2017-18 and Rs.84.96 Cr for FY 2019.20.

2.42 The Commission is requested to consider O&M as per Delhi Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff) Regulations, 2017 and Delhi Electricity Regulatory Commission (Business Plan) Regulations, 2017 which are Rs. 58.38 Cr. for FY 2017-18 and Rs. 65.11 Cr for FY 2019-20.

- 2.43 The increase in 53% and 31% for FY 2017-18 and 2019-20 respectively are exceptionally higher resulting in to burdening of Delhi Consumers.
- 2.44 Regulation 148 of the DERC (Terms and Conditions for Determination of Tariff) Regulations, 2017 provided that the financial gain to a generating company or the transmission licensee, as the case may be, on account of normative parameters shall be shared between generating company/ transmission licensee and the beneficiaries on monthly basis with annual reconciliation.
- 2.45 Thus, in the above case if the Commission trued up normative O&M expenses more than the actual O&M expenses, the differential amount should be shared with the beneficiaries.

Petitioner's Submission

- 2.46 Sharing of O&M expenses being lesser than normative value is not as per Tariff Regulations, 2017. As in case of O&M expenditure, same is allowed on normative basis and cannot be trued up. In this regard, clause 87 of Tariff Regulations, 2017 clearly mentions that normative O&M expenditure for respective control period shall not be trued up.
- 2.47 Clause 87 of Tariff Regulations, 2017 clearly mentions the existing provisions. The relevant content of the applicable clause of Tariff Regulations, 2017 is reproduced as under:

"87. The Utilities shall be allowed Operation and Maintenance expenses on normative basis including expenses for raising the loan for funding of Working Capital and Regulatory Asset as specified by the Commission in the Business Plan Regulations for the respective Control Period:

Provided that the Normative O&M expenses for the respective Control Period shall not be trued up;

Provided further that the water charges, statutory levy and taxes under O&M expenses if indicated separately in the audited financial statement shall not form part of Normative O&M expenses."

Commission's View

2.48 The Commission has considered the provisions of Tariff Regulations, 2017 and Business Plan Regulations, 2017 while considering the O&M Expenses for the Petitioner.

Issue 8: Additional O&M expenses on account of Dry Low NOx (DLN) Burner / Sewage Treatment Plant (STP)**Stakeholder's View**

2.49 It is clarified that normative allowable expenses as per DERC (Business Plan) Regulations, 2017 was Rs 74.50 Cr which is higher than the actual O&M expenses of Rs 61.44 Cr for the year which includes the expenses done towards DLN burners/ STP.

2.50 From the above submission it is clear that actual expenses are lower than the normative expenses hence, additional claim made by the Petitioner towards DLN Burner/ STP may not be allowed.

Petitioner's Submission

2.51 The Commission has been allowing additional expenditure on account of sewage water uses and related expenditure of running STP. Similarly, the Dry Low NOx technology being new in India and important to limit the NOx emission level from the plant. This is additional feature and needs additional O&M expenditure on gas Turbines in a cyclic manner. However, in order to avoid tariff shock on consumers in case same is allowed in particular year, the state Commission has been allowing total expenditure on STP and DLN in Equal instalments each year of a MYT Period. The claim of water charges is as per clause 87 of Tariff Regulations, 2017.

Commission's View

2.52 The Commission after due prudence check and based on the submission of documents pertaining to the said expenses has considered the same appropriately in line with the provisions of Tariff Regulations, 2017 and Business Plan Regulations, 2017

Issue 9: Working capital**Stakeholder's View**

- 2.53 Regulation 148 of the DERC (Terms and Conditions for Determination of Tariff) Regulations, 2017 provide that the financial gain to a generating company or the transmission licensee, as the case may be, on account of normative parameters shall be shared between generating company/ transmission licensee and the beneficiaries on monthly basis with annual reconciliation." Hence any saving in working capital interest should be shared with beneficiaries.
- 2.54 The Petitioner has claimed Rs.236 Cr for FY 2017-18 and Rs.381 Cr for FY 2019-20 as working capital.
- 2.55 The Petitioner is requested to furnish the details of list of spare parts, fuel bill, DISCOMs bills etc.

Petitioner's Submission

- 2.56 Sharing of interest on Working capital is not as per Tariff Regulations, 2017. Working Capital same is allowed on normative basis and cannot be trued up. In this regard content of clause 86 of Tariff Regulations, 2017 is reproduced as under for ready reference :

"86. Interest on Working capital shall be payable on normative basis notwithstanding that the utility has availed any loan for the working capital."

- 2.57 Landed fuel price for determination of tariff for FY 2017-18 was taken as weighted average landed price and GCV for March, April & May 2017 being 12.99 Rs/SCM @ GCV of 9510.84 kCal/SCM respectively, at the time of determination of tariff. However as per clause 107 of Tariff Regulations, 2017, the landed fuel cost for tariff determination is to be taken as moving average cost of fuel before the start of tariff period. The relevant clause of DERC Regulation 2017 is reproduced as under:-

"107. Landed fuel cost for tariff determination: The landed fuel cost of primary fuel and secondary fuel for tariff determination shall be based on actual weighted moving average cost of respective fuel before the start of the tariff period for existing and new generating stations."

- 2.58 Accordingly, the petitioner has calculated moving average of previous three months i.e. Jan, Feb & March 2017 (in absence of clarity on duration for moving average). The value of primary fuel price thus arrived as per regulation is lesser than already approved by the commission. Thus, the petitioner submission for revision in working capital is in line with clause 107 as above.
- 2.59 As per clause 86 of DERC Tariff Regulations, 2017, the interest on working capital is allowed on normative basis therefore details required are unwarranted. However the details of fuel bills are regularly uploaded on the public notice page of company website in Form 15 as per direction of the state Commission. The copy of energy bills raised to DISCOMs is already available them. However, the details required will not serve any purpose in deciding tariff/true up as components of working capital and interest thereof is anyways allowed on normative basis.

Commission's View

- 2.60 The Commission has determined the Working Capital for FY 2017-18 as per the provisions of Tariff Regulations, 2017 and Business Plan Regulations, 2017

Issue 10: Actual Interest Rate

Stakeholder's View

- 2.61 Actual interest rate is not provided. As per the DERC (Business Plan) Regulations, 2017 if actual cost is lower than the approved cost of debt, Incentive sharing should be done with beneficiaries.

Petitioner's Submission

- 2.62 The petitioner has no outstanding capital loan for the period. Therefore the same has not been mentioned in the tariff petition.

Commission's View

2.63 The Commission has appropriately considered the rate of interest in the relevant section of this Order

Issue 11: Variable Cost**Stakeholder's View**

2.64 Fuel Consumption

a) APM/PMT gas: 219.76176 MMSCM

b) Spot R-LNG: 191.07467 MMSCM

2.65 It is evident that generator has been using the high cost RLNG power, resulting in burden on Delhi consumers.

2.66 As the Petitioner is relatively an efficient plant and it is the duty of the generator to arrange the fuel at reasonable cost effective rate.

Petitioner's Submission

2.67 There is contract for sufficient amount of APM gas. However as per directions of Ministry of Power, Govt. of India priority and allotment of cheaper Domestic gas i.e APM, NON-APM & PMT has changed and Power sector has been placed in lower priority as compared to domestic, transport and fertilizer sector requirement. This is true for our power plants also from where Delhi DISCOMs are scheduling power. These plants also tie up RLNG gas to cope up with short fall in cheaper domestic gas supply. The Petitioner plant is one of the few power plants having higher efficiency in gas turbine category. Further allegation of high ECR is baseless as the plants stands at favourable position as compared to many of the power plants from where Delhi DISCOMs schedule power.

2.68 Erratic scheduling by Delhi DISCOMs results in placing the plant at inferior position in MoD. All efforts are being made at high level to schedule cheaper gas for the plant.

Commission's View

2.69 The Petitioner must run the power plant on cheaper fuel before moving on to costlier fuel in order to cater to its scheduled generation.

Issue 12: Weighted Average Cost of Capital (WACC) for the purpose of computing ROCE**Stakeholder's View**

- 2.70 WACC has been wrongly computed by the Petitioner. It is submitted that as per DERC (Terms and Conditions for Determination of Tariff) Regulations, 2017).
- Working capital should be considered as 100% debt financing and
 - the remaining part of RRB should be computed in 70: 30 Debt equity ratio for the purpose of Computation of WACC.

Petitioner's Submission

- 2.71 The Petitioner has submitted its stand on arriving weighted average cost of capital and computation of RoCE in clause 4.5 of the tariff petition. It is reiterated that the current petition has been filed by petitioner without prejudice to submission against commission tariff order dated 31.08.2017 in RP No. 59 of 2017 & 41 of 2018 against DERC tariff order dated 28.03.2018 on the matter.

Commission's View

- 2.72 The Commission has considered the provisions of Tariff Regulations, 2017 and Business Plan Regulations, 2017 while determining the WACC and RoCE

Issue 13: Income Tax**Stakeholder's View**

- 2.73 Income tax shall be limited to actual tax paid or Tax on ROE whichever is lower (Refer Regulation 72 of DERC (Terms and Conditions for Determination of Tariff) Regulations, 2017).

Commission's View

- 2.74 The Commission has considered the Income Tax paid for FY 2017-18 as per the provisions of Tariff regulations, 2017 and Business Plan Regulations, 2017

Issue 14: Non-Tariff Income (NTI):**Stakeholder's View**

2.75 The Petitioner has not provided any information towards non-tariff income for the purpose of determination of tariff. Non-Tariff Income may be considered based on actual of FY 2017-18 for the purpose of computation of ARR for FY 2019-20.

Petitioner's Submission

2.76 As per clause 94 of Tariff Regulations, 2017, the non tariff income consists of following:-

- i. Income from rent of land or buildings;
- ii. Net Income from sale of de-capitalised assets;
- iii. Net Income from sale of scrap;
- iv. Income from statutory investments;
- v. Net Interest on delayed or deferred payment on bills;
- vi. Interest on advances to suppliers/contractors;
- vii. Rental from staff quarters;
- viii. Rental from contractors;
- ix. Income from Investment of consumer security deposit;
- x. Income from hire charges from contactors and others, etc.

Commission's View

2.77 The Commission has considered the NTI for the Petitioner in line with the provisions of Tariff Regulations, 2017 and Business Plan Regulations, 2017

Issue 15: Sharing of Financial gain to a generating company on account of operational parameters**Stakeholder's View**

2.78 Regulation 149 of the DERC (Terms and Conditions for Determination of Tariff) Regulations, 2017 provided that "the financial gain to a generating company or the transmission licensee, as the case may be, on account of operational parameters shall

be shared in the ratio as specified by the Commission in the Business Plan Regulations, 2017.” Thus, the Petitioner is requested to share the benefit with beneficiaries on account of any saving in operation parameters.

Petitioner’s Submission

2.79 Station Heat Rate in combined cycle mode is lower than the normative value. However, the concept of such sharing has been dropped by the commission while framing Business Plan Regulations, 2017.

Commission’s View

2.80 The Commission has considered the SHR and its impact as approved in the Business Plan Regulations, 2017

Issue 16: Depreciation

Stakeholder’s View

2.81 The Petitioner claimed Rs. 13.67 Cr for FY 2017-18 and Rs. 13.92 Cr for FY 2019-20.

2.82 The asset Class on which depreciation has been charged, should be provided with their Useful Life in years in the depreciation schedule.

Petitioner’s Submission

2.83 In this regard it is to submit that 70% accumulated depreciation as per DERC Tariff Regulations, 2007 and 2011 was achieved in case of the Petitioner in the year 2015-16. Thereafter, the balance value of remaining depreciation of 20% as per clause 6.33 of DERC Tariff Regulations, 2011 is being claimed by spreading it over the remaining useful life of assets such that maximum depreciation does not exceeds 90%. Accordingly, the Petitioner is claiming average depreciation since FY 2015-16. This is notional therefore claimed value may not be same and not required as per above provision. The same is also in line with clause 82 of Tariff Regulations, 2017.

Commission’s View

2.84 The Commission has computed the depreciation for the Petitioner in line with the provisions of Tariff Regulations, 2017 and Business Plan Regulations, 2017

Issue 17: Working Capital**Stakeholder's View**

- 2.85 The Petitioner has claimed Rs.236 Cr for FY 2017-18 and Rs.381 Cr for FY 2019-20 as working capital.
- 2.86 The Petitioner is requested to furnish the details of list of spare parts, fuel bill, DISCOMs bills etc.

Petitioner's Submission

- 2.87 As per clause 86 of Tariff Regulations, 2017, the interest on working capital is allowed on normative basis therefore details required are unwarranted. However the details of fuel bills are regularly uploaded on the public notice page of company website in Form 15 as per direction of the state Commission. The copy of energy bills raised to DISCOMs is already available them. However, the details required will not serve any purpose in deciding tariff/true up as components of working capital and interest thereof is anyways allowed on normative basis.

Commission's View

- 2.88 The Commission has determined the Working Capital for FY 2017-18 in line with the provisions of Tariff Regulations, 2017 and Business Plan Regulations, 2017

Issue 18: Requirement of Loan and Equity**Stakeholder's View**

- 2.89 As per Regulation 63 of Delhi Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff) Regulations, 2017 the Debt to equity ratio will be 70:30 for determination of Tariff. Relevant extract is:

"DEBT-EQUITY RATIO

"63. For determination of Tariff, the debt-equity ratio for any project or scheme under commercial operation shall be considered as 70:30:

Provided that:

- (i) Where equity actually deployed is less than 30% of the capital cost, actual equity shall be considered for determination of tariff;*

- (ii) *Where equity actually deployed is more than 30% of the capital cost, equity in excess of 30% shall be treated as notional loan;*
- (iii) *The equity invested in foreign currency shall be designated in Indian rupees on the date of each investment;*
- (iv) *Any grant/contribution/deposit obtained for the execution of the project/scheme shall not be considered as a part of capital structure for the purpose of debt: equity ratio."*

64. *The Utility shall submit the audited statement regarding reconciliation of equity required and actually deployed to meet the capital expenditure of the project or scheme and funding of regulatory asset:*

Provided that the reconciliation statement shall indicate the movement of equity with details of return on equity, incentive/disincentive, additional equity infused, distribution of dividend, normative loan etc."

2.90 In view of the above, the Petitioner is requested to provide copy of audited statement regarding reconciliation of equity and its movement. Also the Commission is requested to consider debt-equity ratio as per applicable Regulations.

Petitioner's Submission

2.91 Since accumulated depreciation over and above 70% of Gross Fixed asset during FY 2017-18, the remaining value is treated as 100% equity. Accordingly, the Petitioner has treated the net fixed asset as opening equity.

2.92 There is no outstanding capital loan as on date. The total GFA is only part of Equity. Petitioner has submitted the details of arriving weighted average cost of capital and computation of RoCE in clause 4.5 of the tariff petition. It is reiterated that the current petition has been filed by petitioner without prejudice to submission against commission tariff order dated 31.08.2017 in RP No. 59 of 2017 & 41 of 2018 against DERC tariff order dated 28.03.2018 on the matter.

Commission's View

2.93 The Commission has considered the requirement of loan and equity as per the provisions of Tariff Regulations, 2017 and Business Plan Regulations, 2017

Issue 19: CAPEX Schemes – Upgradation of processors of STG control System, Replacement of 2x50 KVA station UPS system & Replacement of CO₂ flooding system of Fr9E Gas Turbine

Stakeholder's View

2.94 Such expenditure is not utilized for any life extension of plant hence it should not be a part of capital expenditure and it should be covered under normative O&M.

Petitioner's Submission

2.95 The Petitioner is a designated consumer under PAT Scheme of Bureau of Energy Efficiency, Ministry of Power, GoI Notification on 30th March, 2012. The PAT framework has been developed considering the legal requirement under EC Act, 2010. The PAT scheme is involved in Order to incentivize industry to achieve better energy efficiency improvement than their specified SEC improvement targets in a cost effective manner. BEE, the nodal agency for implementation of PAT had given target to petitioner to reduce its net specific heat rate (NSHR) from average heat rate of 2100.68 to 2081.97 Kcal/kWh during 2016-17 to 2018-19 in PAT-II Cycle. Apart from above, there are certain expenditures required to be implemented during FY 2019-20 due to obsolescence and non availability of spares and services.

2.96 Further, CAPEX schemes are not only meant for life extension. Deviation of performance of plant and Equipments, damage caused by Natural Calamities, Obsolescence of technology, need for up gradation of capacity for Technical reasons such as increase in fault level are other reasons allowed for implementation of additional CAPEX schemes for existing plants as per clause 43 of Tariff Regulations, 2017. The proposed system needs to be replaced due to obsolescence. The scheme is admissible as per clause 43(7) of Tariff Regulations, 2017.

Commission's View

2.97 Schemes pertaining to FY 2018-19 shall be appropriately dealt at the time of true up of ARR for FY 2018-19.

Issue 20: RLNG/Spot RLNG being used for generation**Stakeholder's View**

2.98 The Petitioner is using RLNG/Spot RLNG for scheduling of power due to non availability of sufficient firm allocation of APM/PMT gas. In view of that, it is submitted that the Commission may be pleased to direct the Petitioner to restrict on APM/PMT available gas for scheduling of power and Delhi SLDC should follow the MoD principle in these plants also.

Petitioner's Submission

2.99 DISCOMs are aware of existing contract of Gas, its quantum of availability depends on government orders from time to time. The supply of cheaper domestic gas though contracted, to meet out the full requirement of the station of the Petitioner has been reduced due to prioritization of allocation of domestic gas and placing gas based station at inferior priority. Comparing ECR of the Petitioner to other power plant of similar / different technology, size and capacity and situated outside the load centre ignores importance of gas based power plant situated at load centre with the capability of black start, efficient generation, quick start/ stop facility, part load operation in close and open cycle.

Commission's View

2.100 SLDC follows the principles of Merit Order Despatch for scheduling the power from Generating Stations which is essential for ensuring Least cost of power procurement and Grid Stability

A3: TRUE UP OF FY 2017-18

3.1 Regulation 9 & 10 of Tariff Regulations, 2017 specifies the following:

“9. The Commission shall issue Annual Tariff Order for each year of the Control Period based on the principles laid down in these Regulations read with Business Plan Regulations for the respective Control Period notified by the Commission.

10. The Commission shall true up various components of the ARR of the Generating Entity and Transmission Licensee at the end of the Financial Year as detailed out in these Regulations.”

3.2 Regulation 146 of Tariff Regulations, 2017 specifies the following:

“146. The Commission shall carry out truing up of tariff based on the performance for generating stations and taking into account of the following Uncontrollable parameters:

Force Majeure;

Change in Law;

Re-financing of Loan; and

Primary Fuel Cost.”

3.3 Regulation 62 of Tariff Regulations, 2017 specifies the following:

“62. In case of the existing projects/scheme, the Generating Entity or Transmission Licensee, as the case may be, shall be allowed tariff by the Commission based on the admitted capital cost as on 1st April of the relevant year and projected additional capital expenditure for the respective years of the Control Period in accordance with the Regulation: Provided that:

(i) The Generating Entity or Transmission Licensee, as the case may be, shall continue to bill the beneficiaries at the existing tariff approved by the Commission for the period starting from 1st April of new Control Period till approval of tariff by the Commission for new Control Period in accordance with these Regulations;

(ii) where the capital cost considered in tariff by the Commission on the basis of

projected capital cost as on COD or the projected additional capital expenditure submitted by the Generating Entity or Transmission Licensee, as the case may be,, as the case may be, exceeds the actual capital cost incurred on year to year basis by more than 5%, the Generating Entity or Transmission Licensee, as the case may be, shall refund to the beneficiaries/consumers, the excess tariff recovered corresponding to excess capital cost, as approved by the Commission along with interest at 1.20 times of the bank rate as prevalent on April 1 of respective year;

(iii) The Generating Entity or Transmission Licensee, as the case may be, shall file a true up Petition to the Commission, along with all supporting documents for consideration of any upward revision in the tariff, where the capital cost considered in tariff by the Commission on the basis of projected capital cost as on COD or the projected additional capital expenditure falls short of the actual capital cost incurred on year to year basis by more than 5%. The Generating Entity or Transmission Licensee, as the case may be, shall be entitled to recover from the beneficiaries for the shortfall in tariff corresponding to addition in capital cost, as approved by the Commission along with interest at 0.80 times of bank rate as prevalent on 1st April of respective year.”

- 3.4 Therefore, in accordance with Tariff Regulations, 2017 and Business Plan Regulations, 2017, the Commission has tried up the expenses for the Petitioner for FY 2017-18.

NORMS OF OPERATION

AVAILABILITY

Petitioner's Submission

- 3.5 The Petitioner has submitted that PPS-I achieved availability over and above Normative Availability as provided in Tariff and business Plan Regulations, 2017.
- 3.6 Actual Availability for PPS-I during FY 2017-18 submitted by the Petitioner is as follows:

Table 2: Petitioner Submission: Availability

Particulars	UoM	FY 2017-18
Plant Availability	%	92.64%

Commission's Analysis

3.7 The Commission in its Business Plan Regulations, 2017 has approved the availability of 85% for PPS-I Station for FY 2017-18 to 2019-20 as follows:

"8. NORMS OF OPERATION FOR GENERATING STATIONS:

(1) Normative Annual Plant Availability Factor and Normative Annual Plant Load Factor for existing generating stations of Delhi shall be as follows:

I. Normative Annual Plant Availability Factor (NAPAF) : 85%

II. Normative Annual Plant Load Factor (NAPLF) : 85%"

3.8 The Commission has verified the data regarding plant availability for true up of PPS-I for FY 2017-18 from SLDC Delhi and has approved the plant availability for the purpose of true up of FY 2017-18 as follows:

Table 3: Commission Approved: Plant Availability for FY 2017-18

S. No.	Station	UoM	FY 2017-18		
			MYT Order July 2012	Actual as submitted by Petitioner	Approved for True Up
1	PPS-I	%	85.00	92.64%	92.64%

STATION HEAT RATE (SHR)**Petitioner's Submission**

3.9 The Petitioner has submitted that guaranteed heat rate of the turbines of PPS-I as given by the manufacturer is 1939 kCal/kWh in combined cycle mode and 2986 kCal/kWh in open cycle mode at 100% PLF. However, Station Heat Rate achieved during FY 2017-18 of PPS-I in open cycle mode is 3176 kCal/kWh which is very high as compared to allowed Heat rate by Commission i.e 2900 kCal/kWh as specified in the Business Plan Regulations, 2017.

3.10 In this regard, the Petitioner submitted that station runs in open cycle mode as and when requisitioned by SLDC, Delhi. Thus, the station may be allowed heat rate as per actual, as there is a direct loss on account of recovery of lesser fuel cost when operated in open cycle mode. Therefore, the petitioner requested the Commission to approve actual SHR achieved in open and close cycle mode during FY 2017-18.

3.11 The backing down and open cycle generation for FY 2017-18 is computed as under:

Table 4: Petitioner Submission: Details of Back down & open cycle Generation

S. No.	Parameters	UoM	FY 2017-18	Remarks
A	Station Heat Rate	kCal/kWh	1973	
B	Heat Rate (OC)	kCal/kWh	3176	
C	Heat Rate (CC)	kCal/kWh	1969	
D	Gross Generation	MU	1954.999	
E	Open Cycle Gen.	MU	6.988	Certified by SLDC
F	PAF	%	92.64	Certified by SLDC
G	PLF	%	67.63	
H	Backdown Gen.	%	25.01	$H = F - G$
I	Plant Capacity	MU	2678.037	$I = \frac{330 * 365 * 24 * F}{100 * 1000}$
J	Back down Gen.	MU	669.823	$J = I * H$

3.12 In view of the above, the Petitioner has submitted that backing down and open cycle generation is relatively high which results in increase in Heat Rate & auxiliary consumption. Accordingly, the Petitioner has requested the Commission to allow open cycle heat rate of 3176 kCal/kWh for FY 2017-18 as PPS-I is subject to backing down and sudden start and stops, on the instruction of SLDC.

3.13 Actual Station Heat Rate (SHR) as submitted by the Petitioner is as follows:

Table 5: Petitioner Submission: Station Heat Rate

Particulars	UoM	FY 2017-18
Station Heat Rate (CC)	kCal/kWh	1973
Station Heat rate (OC)	kCal/kWh	3176

Commission's Analysis

3.14 The Commission in its Business Plan Regulations, 2017 had approved the SHR as following:

"8. NORMS OF OPERATION FOR GENERATING STATIONS:

(2) GROSS STATION HEAT RATE (GHR)

Gross Station Heat Rate for existing generating stations of Delhi shall be as follows:

Table 4: Gross Station Heat Rate (GHR)

S. No.	Generating Station	Combined Cycle	Open Cycle
		(kCal/ kWh)	
1	Gas Turbine Power Station (GTPS)	2450	3125
2	Pragati Power Station I (PPS I)	2000	2900

.....”

- 3.15 In view of the above, the Commission approves the normative Gross Station Heat Rate for PPS-I Station for true up of FY 2017-18 as per the approved norms in Business Plan Regulations, 2017 as follows:

Table 6: Commission Approved: Station Heat rate (kCal/ kWh)

S. No	Station	Mode of Operation	UoM	FY 2017-18		
				Business Plan Regulations , 2017	Actual as submitted by Petitioner	Approved for True Up
1	PPS-I	Combined Cycle	kCal/ kWh	2000	1973	2000
		Open Cycle	kCal/ kWh	2900	3176	2900

AUXILIARY POWER CONSUMPTION (APC)

Petitioner's Submission

- 3.16 The Petitioner has submitted that the Auxiliary Power Consumption achieved during FY 2017-18 has increased due to unproductive auxiliary consumption on part load operation & frequent back down. Thus Petitioner requested the Commission to allow APC achieved as per actual for FY 2017-18.

- 3.17 Actual Auxiliary Power Consumption (APC) achieved for PPS-I during FY 2017-18 as submitted by the Petitioner is as under:

Table 7: Petitioner Submission: Auxiliary Power Consumption

Particulars	UoM	FY 17-18
Auxiliary Consumption	%	2.39%

Commission's Analysis:

3.18 The Commission in its Business Plan Regulations, 2017 had approved the Auxiliary Power Consumption as follows:

"8. NORMS OF OPERATION FOR GENERATING STATIONS:

(3) AUXILIARY ENERGY CONSUMPTION

Auxiliary Energy Consumption shall be computed in two parts:

a) Fixed: 0.5% of the generation at normative PLF of the plant capacity which shall form part of other expenses under Fixed Cost, at energy charge rate approved by the Commission in respective Tariff Order.

b) Variable: 2.0% in Combined Cycle mode and 0.5% in Open Cycle mode of the actual generation which shall form part of computation of energy charge rate of the respective month."

3.19 Accordingly, the Commission approves the Auxiliary Power Consumption for PPS-I for FY 2017-18 as follows:

Table 8: Commission Approved: Fixed Auxiliary Power Consumption for FY 2017-18

S. No.	Station	UoM	FY 2017-18		
			Business Plan Regulations, 2017	Actual as submitted by Petitioner	Approved for True Up
1	PPS-I	%	0.5*	0.5*	0.5*

* @ generation at normative PLF of the plant capacity which shall form part of other expenses under Fixed Cost, at energy charge rate approved by the Commission

Table 9: Commission Approved: Variable Auxiliary Power Consumption for FY 2017-18

S. No.	Station	Mode of Operation	UoM	FY 2017-18		
				Business Plan Regulations, 2017	Actual as submitted by Petitioner	Approved for True Up
1	PPS-I	Combined Cycle	%	2.00	3.78	2.00
		Open Cycle	%	0.50	-	0.50

VARIABLE COST FOR PPS-I**FUEL CONSUMPTION****Petitioner's Submission**

3.20 The Petitioner has submitted that Pragati Power Station-I has a long-term agreement with Gas Authority of India Limited (GAIL) for supply of Gas. Initially, PPS-I was having an allocation of 1.75 MMSCMD of APM Gas. This gas was sufficient to run both the Gas Turbines on base load. Due to depleting gas reserves of ONGC, GAIL has been imposing cuts on its supply on day to day basis. The present gas allocation on day to day basis is between 1.1 MMSCMD to 1.2 MMSCMD of APM gas and 0.28 MMSCMD of PMT gas. To meet the short fall in the gas supply, fall back agreement has been signed with GAIL for supply of spot R-LNG gas on take and pay basis. Recently, MoP&NG has allocated 0.02 MMSCMD non-APM ONGC gas whose supply has been commenced from mid October, 2011.

3.21 The Consumption of APM Gas, NAPM gas, PMT Gas, R-LNG gas and Spot-Gas for FY 2017-18 submitted by the Petitioner is as follows:

Table 10: Petitioner Submission: Total Consumption of Gas

Particulars	Unit	FY 2017-18
APM Gas	MMSCM	164.358
NAPM Gas	MMSCM	27.869
PMT Gas	MMSCM	27.535
R-LNG Gas	MMSCM	173.720
SPOT RLNG	MMSCM	17.355
Total Gas Consumption	MMSCM	410.836

3.22 The Petitioner has submitted the details of total gas consumption, rate per SCM and total cost of the gas for FY 2017-18 as per actual and fuel cost as follows:

Table 11: Petitioner Submission: Energy Charge Rate and Fuel Cost

Particulars	Unit	Variable Cost FY 2017-18
Total Gas Consumption	MMSCM	410.836
Average Gas Price	Rs./SCM	17.628
Weighted Average GCV	kCal/ SCM	9388.983
Total Gas Cost	Rs. Crores	724.24
Net Generation	MU	1908.37
Variable Cost - CC	Rs./kWh	3.80

Commission's Analysis

- 3.23 The Commission in its Business Plan Regulations, 2017 has specified the norms of operation for generating stations for FY 2017-18 to FY 2019-20. The norms of operation as applicable govern the performance of the generating station which determines the fuel cost.
- 3.24 Further, the Commission vide its e-mail dated 29/01/2019 sought the authenticity of energy charge rate billed by PPS-I from the beneficiary DISCOMs. In response the beneficiary DISCOMs submitted that the computation of energy charge rate billed by PPS-I during FY 2017-18 is as per the provisions of Tariff Regulations, 2017 and Business Plan Regulations, 2017. Accordingly, the Commission has not considered true up of fuel cost for FY 2017-18.

FIXED COST**OPERATION & MAINTENANCE (O&M) EXPENSES****Petitioner's Submission**

- 3.25 The Petitioner has submitted that the Commission has specified Normative Operation and Maintenance expenses in Business Plan Regulation, 2017 as per the table below for plant PPS-I for the control period from FY 2017-18 to FY 2019-20.

Table 12: Petitioner Submission: O&M Expenses (Rs. Lakh/ MW)

Station	2017-18	2018-19	2019-20
PPS-I	17.69	18.68	19.73

Table 13: Petitioner Submission: Additional R&M Expenses for PPS-I (Rs. In Crore)

Station	2017-18	2018-19	2019-20
PPS-I	16.12	16.12	0.00

However, the actual expenses incurred under the head of O&M expenses comprises of expenses like Employees Expenses, Repairs and Maintenance, Administrative and General Expenses etc.

- 3.26 The Petitioner has further submitted that they have installed DLN Burner at PPS-I to control the NOx level. These types of burners were installed for the first time in India.

The additional R&M expenses towards R&M of DLN burners and for critical components of Gas Turbines are required to be incurred by the PPS-I for the smooth operations of the plant and to achieve the target level of generation. All the inspections and overhauling of the machines are as per the manufactures recommendation. The expenditure on DLN Burners is cyclic in nature and its amount varies from year to year depending upon the type of inspections carried out on the machines based on the running hours.

- 3.27 The Petitioner further submitted that the expenditure on DLN and STP are being recognized and allowed separately by this Commission in every tariff order. The Commission in its Tariff Order dated 31.08.2017 has approved an amount of Rs. 65.55 crores claimed by the Petitioner towards DLN Expenditure and allow the recovery of the same over the tariff period starting from FY 2015-16 to FY 2018-19. However, Petitioner had spent the entire amount of Rs. 65.55 crores in one go despite the fact that it will be recovered over the period starting from FY 2015-16 to FY 2018-19. Therefore, the carrying cost on the amount which is being deferred for recovery needs to be allowed to the Petitioner.
- 3.28 The Petitioner further submitted that the PPS-I is sourcing plant water requirement from sewage treatment plants (STP). PPS-I has taken over the operation & maintenance of the sewage water treatment plants from Delhi Jal Board for treating the sewerage water from Delhi Gate Nala and Sen Nursing Home Nala. The actual expenditure on this account of above for FY 2014-15 & FY 2015-16 includes expenditure on operation & maintenance, electricity, Chemicals etc.
- 3.29 Petitioner has incurred an expenditure of Rs 7.55 Crore on account of repair & maintenance on the component of DLN burner and Rs 4.34 Crore on account of STP during FY 2017-18. Accordingly, Petitioner requested Commission to allow expenditure on account of DLN Burner & STP on similar lines as Commission has approved the figures for FY 2015-16 in its tariff order dated 31.08.2017.

- 3.30 The Petitioner has requested the Commission to allow the additional expenditure on account of DLN & STP for FY 2019-20 on normative basis and to be trued up at later stage, as has been done by Commission in previous years.
- 3.31 The summary of Operation and Maintenance expenditure for FY 2017-18 as per actual is as under:

Table 14: Petitioner Submission: O&M Expenses

S. No	Particulars	UoM	FY 2017-18
A	Normative O&M expenses	Rs Cr.	58.38
B	Additional R&M expenses allowed by DERC in its tariff order dated 31.08.2017 along with carrying cost	Rs Cr.	16.12
C	Carrying Cost @ 11.50% on allowed additional R&M Expenses	Rs Cr.	2.78
D	Additional expenditure on account of DLN Burner	Rs Cr.	7.55
E	Additional expenditure on account of STP	Rs Cr.	4.34
F	Total O&M Expenses	Rs Cr.	89.17

Commission's Analysis

- 3.32 The Commission in its Business Plan Regulations, 2017 has specified the normative O&M Expenses for generating stations as under:

"6. OPERATION AND MAINTENANCE EXPENSES

(1) Normative Operation and Maintenance expenses in terms of Regulation 4(3) and Regulation 92 of the DERC (Terms and Conditions for Determination of Tariff) Regulations, 2017 for the Generating Entity shall be as follows :

(a) Normative Operation and Maintenance expenses for existing generating stations shall be as follows :

Table 1: O&M Expenses (Rs. Lakh/ MW)

Station	2017-18	2018-19	2019-20
GTPS	29.66	31.32	33.08
PPS I	17.69	18.68	19.73

(b) Additional R&M Expenses for generating stations shall be as follows:

Table 2: Additional R&M Expenses (in Rs. Cr.)

Station	2017-18	2018-19	2019-20
GTPS	0.00	0.00	0.00
PPS I	16.12	16.12	0.00

(2) Impact of any statutory Pay revision on employee's cost as may be applicable on case to case basis shall be considered separately, based on actual payment made by the Generation Entity and shall be allowed by the Commission after prudence check at the time of true up of ARR for the relevant financial year."

- 3.33 Accordingly, the Commission has approved the amount of Rs. 58.38 Cr. ($330 \times 17.69 / 100$) as the base O&M Expenses for FY 2017-18.
- 3.34 Further, the Petitioner during the prudence check session submitted that as a result of implementation of the recommendation of 7th Pay Commission, an interim relief (IR) has been disbursed to the employees which forms the part of employee cost. Accordingly, the Commission based on the auditor certificate pertaining to the said IR has approved the amount of Rs 5.90 Cr as the impact of statutory pay revision for FY 2017-18. Accordingly, the Commission approves the same for FY 2017-18.
- 3.35 Further, the Petitioner during the prudence check session submitted that the actual expense towards DLN Burner for FY 2017-18 is Rs 7.78 Crores instead of Rs 7.55 Crores as submitted in the petition. The Petitioner submitted the documents substantiating the said claim. The Petitioner also submitted the documents substantiating its claim for expenses towards STP for FY 2017-18.
- 3.36 The Petitioner has claimed an amount of Rs 2.78 Crores as the Carrying Cost on annual additional R&M Expenses of Rs 16.12 Crores for FY 2017-18 to FY 2018-19 allowed in the Business Plan Regulations, 2017. The said issue is sub-judice and shall be dealt appropriately after the outcome of review Petition No. 59&60 of 2017 filed by the Petitioner before the Commission.

3.37 In view of the above, the O&M Expenses approved by the Commission for FY 2017-18 are as follows:

Table 15: Commission Approved: O&M Expenses for FY 2017-18

S. No.	Particulars	UoM	FY 2017-18	
			Petitioner's Submission	Approved for True Up
1	Base O&M Expenses	Rs Cr	58.38	58.38
2	Impact of Statutory Pay Revision	Rs Cr	5.90	5.90
3	Additional R&M Expenses as approved in Business Plan Regulations, 2017	Rs Cr	16.12	16.12
4	Carrying Cost @11.50% on additional R&M	Rs Cr	2.78	0
5	Additional expenditure on account of DLN Burner	Rs Cr	7.78	7.78
6	Additional expenditure on account of STP	Rs Cr	4.34	4.34
7	Total O&M Expenses	Rs Cr	95.31	92.52

CAPITAL EXPENDITURE

Petitioner's Submission

3.38 The capitalization submitted by the Petitioner for FY 2017-18 is as follows:

Table 16: Petitioner Submission: Capital Expenditure

S. No.	Particulars	Unit	FY 2017-18
A	Opening GFA	Rs Cr	1050.38
B	Addition	Rs Cr	0.00
C	Deletion	Rs Cr	0.00
D	Closing GFA	Rs Cr	1050.38
E	Average GFA	Rs Cr	1050.38

Commission's Analysis

3.39 The Commission has tried up the closing Gross Fixed Assets (GFA) for FY 2016-17 in relevant tariff order as Rs 1050.38 Cr. Further it is observed that the Petitioner has not claimed any capitalization and de-capitalisation during FY 2017-18. Accordingly, the Commission has approved the closing and average GFA for FY 2017-18 as under:

Table 17: Commission Approved: Capitalisation

S. No.	Particulars	UoM	FY 2017-18	
			Petitioner Submission	Approved for True up
1	Opening GFA	Rs Cr	1050.38	1050.38
2	Addition	Rs Cr	0	0
3	Deletion	Rs Cr	0	0
4	Closing GFA	Rs Cr	1050.38	1050.38

DEPRECIATION

Petitioner's Submission

3.40 The Petitioner has submitted that the Depreciation for FY 2017-18 has been calculated as per DERC regulation 2017 which reads as under:

"80. The salvage value of the asset shall be considered as 10% and depreciation shall be allowed up to maximum of 90% of the capital cost of the asset:

Provided that any depreciation disallowed on account of lower availability of the generating station or generating unit or transmission system as the case may be, shall not be allowed to be recovered at a later stage during the useful life and the extended life.

81. Land other than the land held under lease shall not be a depreciable asset and its cost shall be excluded from the capital cost while computing depreciable value of the asset.

82. In case of existing assets, the balance depreciable value as on 1st April of any financial year shall be worked out by deducting the cumulative depreciation as admitted by the Commission up to 31st March of the preceding financial year from the gross depreciable value of the assets.

83. The Depreciation for Life extension projects/scheme shall be allowed in the manner as indicated in Regulation 51 of these Regulations."

3.41 The Petitioner submitted that the depreciation allowed by Commission from FY 2002-03 till FY 2016-17 along with advance against depreciation is Rs 795.39 Cr.

3.42 The Petitioner further submitted that PPS-I Station got commissioned in FY 2002-03 and shall complete its useful life by FY 2027-28. Since cumulative depreciation has reached 70% of the total depreciation, therefore, petitioner has spread the remaining depreciable value over the remaining life of the asset. Accordingly, depreciation calculated for FY 2017-18 is as follows:

Table 18: Details of Depreciation

S. No.	Particulars	Unit	FY 17-18
A	Average GFA	Rs Cr.	1050.38
B	Opening Accumulated Depreciation	Rs Cr.	795.39
C	Balance Depreciation	Rs Cr.	149.95
D	Remaining useful life at the opening of FY 2017-18	Years	11
E	Depreciation	Rs Cr.	13.63

* A depreciation of Rs. 13.72 Crore has been considered for FY 2018-19

Commission's Analysis

3.43 The Commission approved the accumulated depreciation at the closing of FY 2016-17 in the relevant tariff order as Rs 795.39 Cr. The same has been considered as the opening accumulated depreciation for FY 2017-18. It is observed that PPS-I Station was commissioned in FY 2002-03 and shall complete its useful life by year 2027-28. Accordingly, the Commission has spread the remaining depreciable value over the remaining life of the asset and has computed depreciation for FY 2017-18.

3.44 The Depreciation approved by the Commission for true up for FY 2017-18 is as follows:

Table 19: Commission Approved: Depreciation for FY 2017-18

S. No.	Particulars	UoM	FY 2017-18		Ref.
			Petitioner's Submission	Approved for True Up	
A	Opening GFA	Rs Cr	1050.38	1050.38	Table 17
B	Additions	Rs Cr	0	0	Table 17
C	Deletions	Rs Cr	0	0	Table 17
D	Closing GFA	Rs Cr	1050.38	1050.38	

S. No.	Particulars	UoM	FY 2017-18		Ref.
			Petitioner's Submission	Approved for True Up	
					Table 17
E	Average GFA	Rs Cr	1050.38	1050.38	(A+D)/2
F	Depreciation	Rs Cr	13.63	13.63	3.43
G	Opening Accumulated Depreciation	Rs Cr		795.39	3.43
H	%age of Accumulated Depreciation to the GFA at opening of FY 2017-18	%		75.72	
I	Closing Accumulated depreciation	Rs Cr		809.02	F+G
J	Average Accumulated depreciation	Rs Cr		802.20	(G+I)/2
K	Depreciation Rate	%		1.30	

WORKING CAPITAL

Petitioner's Submission

3.45 The Petitioner has calculated the Interest on Working Capital as per Tariff Regulations, 2017 which reads as under:

“(2) Open-cycle Gas Turbine/Combined Cycle thermal generating stations as follows:

(a) Fuel Cost for 30 days corresponding to the Normative Annual Plant Availability Factor, duly taking into account mode of operation of the generating station on gas fuel and liquid fuel;

(b) liquid fuel stock for 15 days corresponding to the normative annual plant availability factor, and in case of use of more than one liquid fuel, cost of main liquid fuel duly taking into account mode of operation of the generating stations of gas fuel and liquid fuel;

(c) Maintenance spares @ 30% of Operation and Maintenance expenses specified in this Regulation;

(d) Receivables equivalent to two months of capacity charge and energy charge for sale of electricity calculated on normative plant availability factor, duly taking into account mode of operation of the generating station on gas fuel and liquid fuel; and

(e) Operation and maintenance expenses for one month.

85. Rate of Interest On Working Capital shall be considered as the bank rate as on 1st April of the year plus margin as specified by the Commission for the Control Period and shall be trued up on the basis of prevailing bank rate as on 1st April of the respective financial year:

Provided that the rate of interest availed through open tendering process (Competitive Bidding) among Scheduled Banks, Financial Institutions etc., shall not be trued up.

86. Interest on working capital shall be payable on normative basis notwithstanding that the Utility has availed any loan for the working capital.”

- 3.46 The Petitioner has submitted that the fuel cost is increasing continuously. This increase in prices of fuel had substantial impact on certain components considered in the computation of working capital and resulting in increasing the interest on working capital. Therefore the considerable increase in interest amount in comparison to the interest allowed by the Commission.
- 3.47 The Petitioner has considered the fuel cost for working capital by taking average of three months from Jan-17 to March-17 as per Tariff Regulations, 2017 for FY 2017-18. Accordingly, the weighted average landed price of gas for the period is 13.107 Rs/SCM and weighted average GCV is 9302.163 kCal/SCM. The Fuel Cost computed by the Petitioner considering normative parameters is Rs 692.42 Cr.
- 3.48 Accordingly, the Petitioner has calculated working capital for FY 2017-18 is as under:

Table 20: Petitioner Submission: Requirement of Working Capital

S. No.	Particulars	Unit	FY 2017-18
A	Fuel expenses for 1 month	Rs Cr	57.70
B	Maintenance spares @ 30% of O&M	Rs Cr	25.92
C	O&M expenses for 1 month	Rs Cr	7.20
D	Annual Fixed Cost for the year	Rs Cr	177.52
E	Fuel Cost for the year	Rs Cr	692.42
F	Receivables equivalent to 2 months of capacity and energy charge	Rs Cr	144.99
G	Total Working Capital	Rs Cr	235.81

Commission’s Analysis

- 3.49 Regulation 84 (2) of Tariff Regulations, 2017 specify the following:

“84. The Commission shall calculate the Working Capital requirement for:

(2) *Open-cycle Gas Turbine/Combined Cycle thermal generating stations as follows :*

(a) *Fuel Cost for 30 days corresponding to the Normative Annual Plant Availability Factor, duly taking into account mode of operation of the generating station on gas fuel and liquid fuel;*

(b) *Liquid fuel stock for 15 days corresponding to the normative annual plant availability factor, and in case of use of more than one liquid fuel, cost of main liquid fuel duly taking into account mode of operation of the generating stations of gas fuel and liquid fuel;*

(c) *Maintenance spares @ 30% of Operation and Maintenance expenses specified in this Regulation;*

(d) *Receivables equivalent to two months of capacity charge and energy charge for sale of electricity calculated on normative plant availability factor, duly taking into account mode of operation of the generating station on gas fuel and liquid fuel; and*

(e) *Operation and maintenance expenses for one month”*

3.50 The Commission in Tariff Order for FY 2017-18 determined the working capital of PPS-I Station based on the above provisions.

3.51 Accordingly, the Commission has trued up the working capital for FY 2017-18 as follows:

Table 21: Commission Approved: Working Capital

S. No.	Particulars	Unit	Petitioner Submission	Approved
A	Fuel expenses for 1 month	Rs Cr	57.70	55.92
B	Maintenance spares @ 30% of O&M	Rs Cr	25.92	22.35
C	O&M expenses for 1 month	Rs Cr	7.20	6.21
D	Annual Fixed Cost for the year	Rs Cr	177.52	148.15
E	Fuel Cost for the year	Rs Cr	692.42	671.03
F	Receivables equivalent to 2 months of capacity and energy charge	%	144.99	136.53
G	Total Working Capital	Rs Cr	235.81	221.01

REQUIREMENT OF LOAN AND EQUITY

Petitioner's Submission

3.52 The Petitioner has submitted that since accumulated depreciation is greater than the 70% of Gross Fixed asset during FY 2017-18, the remaining value is treated as 100% equity. Accordingly, the Petitioner has treated the net fixed asset as opening equity.

Table 22: Petitioner Submission: Requirement of Loan & Equity

S. No.	Particulars	Unit	FY 2017-18
A	Opening GFA	Rs Cr	1050.38
B	Opening Accumulated Depreciation	Rs Cr	795.39
C	Opening NFA	Rs Cr	254.99
D	Opening Equity	Rs Cr	254.99
E	Opening Loan Requirement	Rs Cr	0.00
F	Depreciation for the year	Rs Cr	13.63
G	Closing NFA	Rs Cr	241.36
H	Closing Equity	Rs Cr	240.93
I	Closing Loan	Rs Cr	0.00
J	Average Loan	Rs Cr	0.00
K	Average Equity	Rs Cr	247.96

Commission's Analysis

3.53 Regulation 63 of the Tariff Regulations, 2017 deals with financing of the capital cost in Debt Equity ratio to be allowed for existing project or scheme and the relevant extract is as follows:

"63. For determination of Tariff, the debt-equity ratio for any project or scheme under commercial operation shall be considered as 70:30:

Provided that:

- (v) Where equity actually deployed is less than 30% of the capital cost, actual equity shall be considered for determination of tariff;*
- (vi) Where equity actually deployed is more than 30% of the capital cost, equity in excess of 30% shall be treated as notional loan;*
- (vii) The equity invested in foreign currency shall be designated in Indian rupees on the date of each investment;*
- (viii) Any grant/contribution/deposit obtained for the execution of the project/scheme shall not be considered as a part of capital structure for the purpose of debt: equity ratio."*

3.54 In view of the above, the Commission has determined the requirement of Loan & Equity as follows:

Table 23: Commission Approved: Requirement of Loan & Equity

S. No.	Particulars	Unit	Submitted by Petitioner	Approved by Commission	Ref.
A	Opening GFA	Rs Cr	1050.38	1050.38	Table 17
B	Opening Accumulated Depreciation	Rs Cr	795.39	795.39	Table 19
C	Opening Net Fixed Asset (NFA)	Rs Cr	254.99	254.99	A-B
D	Opening Equity	Rs Cr	254.99	76.50	30%xC
E	Opening Loan Requirement	Rs Cr	0.00	178.50	70%xC
F	Depreciation for the year	Rs Cr	13.63	13.63	Table 19
G	Closing NFA	Rs Cr	241.36	241.36	C-F
H	Closing Equity	Rs Cr	240.93	72.41	30%xG
I	Closing Loan	Rs Cr	0.00	168.95	70%xG
J	Average Loan	Rs Cr	0.00	173.72	(E+I)/2
K	Average Equity	Rs Cr		74.75	(D+H)/2
L	Working Capital Requirement	Rs Cr		221.01	Table 21
M	Average RRB	Rs Cr		469.19	J+K+L

RETURN ON CAPITAL EMPLOYED

Petitioner's Submission

3.55 The Petitioner has submitted that Commission has specified the methodology for allowing Return on Capital Employed in Tariff Regulations, 2017 as follows:

“65. Return on Capital Employed shall be used to provide a return to the Utility, and shall cover all financing costs except expenses for availing the loans, without providing separate allowances for interest on loans and interest on working capital.

66. The Regulated Rate Base (RRB) shall be used to calculate the total capital employed which shall include the Original Cost of Fixed Assets (OCFA) and Working Capital. Capital work in progress (CWIP) shall not form part of the RRB. Accumulated Depreciation, Consumer Contribution, Capital Subsidies / Grants shall be deducted in arriving at the RRB.

67. The RRB shall be determined for each year of the Control Period at the beginning of the Control Period based on the approved capital investment plan with corresponding capitalisation schedule and normative working capital.”

69. Return on Capital Employed (RoCE) for the year “i” shall be computed in the following manner:

$$RoCE = WACC_i * RRB_i$$

Where, $WACC_i$ is the Weighted Average Cost of Capital for each year of the Control Period;

RRB_i – Average Regulated Rate Base for the i_{th} year of the Control Period.

70. The WACC for each year of the Control Period shall be computed at the start of the Control Period in the following manner:

$$WACC = [D/(D+E)] * r_d + [E/(D+E)] * r_e$$

Where, D is the amount of Debt derived as per these Regulations;

E is the amount of Equity derived as per these Regulations;”

3.56 The Petitioner has estimated the Regulated Rate Base (RRB) for FY 2017-18 as follows:

Table 24: Estimation of RRB

S. No.	Particulars	Unit	FY 2017-18
A	Opening GFA	Rs Cr	1050.38
B	Opening Accumulated Depreciation	Rs Cr	795.39
C	Opening RRB	Rs Cr	254.99
D	Working Capital	Rs Cr	235.81
E	Depreciation for the year	Rs Cr	13.63
F	Net Addition	Rs Cr	0.00
G	Closing RRB	Rs Cr	477.16
H	Average RRB	Rs Cr	483.98

3.57 Further, petitioner has considered the rate of interest on loan by considering the Bank Rate as Marginal Cost of Fund based Lending Rate (MCLR) of SBI as notified by the State Bank of India and margin as approved in Business Plan Regulations, 2017. Accordingly rate of interest on loan has been considering at 10.98% on the basis of SBI MCLR of 8% as on 1st April, 2017 plus margin of 2.98% for FY 2017-18.

3.58 The Petitioner has considered the base rate of return on equity at 14% and the same has been grossed up with rate of income tax at 21.34% to arrive at the grossed up rate of return of equity of 17.80% for FY 2017-18.

3.59 The Petitioner has computed Weighted Average Cost of Capital (WACC) and Return on Capital Employed (RoCE) as follows:

Table 25: Petitioner Submission: WACC and RoCE

S. No.	Particulars	Unit	FY 20 17-18
A	Average RRB	Rs Cr	483.98
B	Average Loan Requirement for Capital Investment	Rs Cr	0.00
C	Loan for Working Capital Requirement	Rs Cr	235.81
D	Total Loan	Rs Cr	235.81
E	Average Equity	Rs Cr	247.96
F	Cost of Debt, Rd	%	10.98
G	Return on Equity, Re	%	17.80
H	WACC	%	14.48
I	RoCE	Rs Cr.	70.06

Commission's Analysis

3.60 Regulation 3 and 4 of Business Plan Regulations, 2017 deal with Return on Equity (RoE) and Tax on Return on Equity as follows:

“3. RATE OF RETURN ON EQUITY

Return on Equity in terms of Regulation 4(1) of the DERC (Terms and Conditions for Determination of Tariff) Regulations, 2017 for Generating Entity shall be computed at the Base Rate of 14.00% on post tax basis.

4. TAX ON RETURN ON EQUITY

The base rate of Return on Equity as allowed by the Commission under Regulation 3, shall be grossed up with the Minimum Alternate Tax or Effective Tax Rate of the respective financial year in terms of Regulation 72 and 73 of the DERC (Terms and Conditions for Determination of Tariff) Regulations, 2017, as per the following formula:

$$\text{Rate of Return on Equity} = 14 / [(100 - \text{Tax Rate}) / 100]$$

where, Tax Rate is Minimum Alternate Tax (MAT) or Effective Tax Rate, as the case may be.”

3.61 It is observed during the prudence check session with the Petitioner, that the Petitioner has paid income tax for AY 2018-19 at an income tax rate of 20.20%. Accordingly, the Commission has considered the grossed up rate on return on equity as 17.99% for FY 2017-18.

3.62 Regulation 77 of Tariff Regulations, 2017 deal with interest on Loan as follows:

“77. The rate of interest on loan shall be based on weighted average rate of interest for actual loan portfolio subject to the maximum of bank rate as on 1st

April of the year plus the margin as approved by the Commission in the Business Plan Regulations for a Control Period:

Provided that in no case the rate of interest on loan shall exceed approved rate of return on equity:

Provided further that if there is no actual loan for a particular year but normative loan is still outstanding, the last available weighted average rate of interest shall be considered:

Provided also that if the Utility does not have actual loan then the rate of interest shall be considered at the bank rate plus margin, as specified by the Commission in the Business Plan Regulations, for the notional loan of the relevant control period:

Provided also that the loan availed through open tendering process (Competitive Bidding) among Scheduled Banks, Financial Institutions etc., shall be considered at the rate discovered through open tendering process.”

3.63 The Petitioner during prudence check session submitted that the latest loan borrowing percentage for the Petitioner is 9.75%. Accordingly, the Commission has considered the same rate of interest on loan for FY 2017-18.

3.64 Regulation 85 and 86 of Tariff Regulations, 2017 deal with the Interest on Working Capital and the relevant extract is as follows:

“85. Rate of Interest On Working Capital shall be considered as the bank rate as on 1st April of the year plus margin as specified by the Commission for the Control Period and shall be trued up on the basis of prevailing bank rate as on 1st April of the respective financial year:

Provided that the rate of interest availed through open tendering process (Competitive Bidding) among Scheduled Banks, Financial Institutions etc., shall not be trued up.

86. Interest on working capital shall be payable on normative basis notwithstanding that the Utility has availed any loan for the working capital.”

3.65 Further, the Commission has specified the methodology for allowing Return on Capital Employed in Tariff Regulations, 2017 as follows:

“65. Return on Capital Employed shall be used to provide a return to the Utility, and shall cover all financing costs except expenses for availing the loans, without providing separate allowances for interest on loans and interest on working capital.

66. The Regulated Rate Base (RRB) shall be used to calculate the total capital employed which shall include the Original Cost of Fixed Assets (OCFA) and Working Capital. Capital work in progress (CWIP) shall not form part of the RRB. Accumulated Depreciation, Consumer Contribution, Capital Subsidies / Grants shall be deducted in arriving at the RRB.

67. The RRB shall be determined for each year of the Control Period at the beginning of the Control Period based on the approved capital investment plan with corresponding capitalisation schedule and normative working capital.

68. The Regulated Rate Base for the i th year of the Control Period shall be computed in the following manner:

$$RRBi = RRB_{i-1} + \Delta ABi / 2 + \Delta WCi;$$

Where,

“ i ” is the i^{th} year of the Control Period;

$RRBi$: Average Regulated Rate Base for the i^{th} year of the Control Period;

ΔWCi : Change in working capital requirement in the i^{th} year of the Control Period from $(i-1)^{\text{th}}$ year;

ΔABi : Change in the Capital Investment in the i th year of the Control Period;

This component shall be arrived as follows:

$$\Delta ABi = Invi - Di - CCI - Ret_i;$$

Where,

$Invi$: Investments projected to be capitalised during the i^{th} year of the Control Period and approved;

Di : Amount set aside or written off on account of Depreciation of fixed assets for the i^{th} year of the Control Period;

CCI : Consumer Contributions, capital subsidy / grant pertaining to the ΔABi and capital grants/subsidies received during i th year of the Control Period for construction of service lines or creation of fixed assets;

Ret_i: Amount of fixed asset on account of Retirement/ Decapitalisation during ith Year;

RRB i-1: Closing Regulated Rate Base for the Financial Year preceeding the ith year of the Control period. For the first year of the Control Period, Closing RRB i-1 shall be the Opening Regulated Rate Base for the Base Year i.e. RRBO;

$$RRBO = OCFAO - ADO - CCO + WCO;$$

Where;

OCFAO: Original Cost of Fixed Assets at the end of the Base Year;

ADO: Amounts written off or set aside on account of depreciation of fixed assets pertaining to the regulated business at the end of the Base Year;

CCO: Total contributions pertaining to the OCFAo, made by the consumers, capital subsidy / grants towards the cost of construction of distribution/service lines by the Distribution Licensee and also includes the capital grants/subsidies received for this purpose;

WCO: working capital requirement in the (i-1)th year of the Control Period.

69. Return on Capital Employed (RoCE) for the year "i" shall be computed in the following manner:

$$RoCE = WACC_i * RRBi$$

Where,

WACC_i is the Weighted Average Cost of Capital for each year of the Control Period;

RRBi – Average Regulated Rate Base for the ith year of the Control Period.

70. The WACC for each year of the Control Period shall be computed at the start of the Control Period in the following manner:

$$WACC = \left[\frac{D}{D + E} \right] * r_d + \left[\frac{E}{D + E} \right] * r_e$$

Where,

D is the amount of Debt derived as per these Regulations;

E is the amount of Equity derived as per these Regulations;

Where equity employed is in excess of 30% of the capital employed, the amount of equity for the purpose of tariff shall be limited to 30% and the balance amount shall be considered as notional loan. The amount of equity in excess of 30% treated as notional loan. The interest rate on excess equity shall be the weighted average rate of interest on the actual loans of the Licensee for the respective years. Where actual equity employed is less than 30%, the actual equity and debt shall be considered;

Provided that the Working capital shall be considered 100% debt financed for the calculation of WACC;

rd is the Cost of Debt;

re is the Return on Equity.”

3.66 Accordingly the Commission has tried up the Return on Capital Employed for FY 2017-18 as follows:

Table 26: Commission Approved: WACC and RoCE

S. No.	Particulars	Unit	Submitted by Petitioner	Approved by Commission	Ref.
A	Average RRB	Rs Cr.	483.98	469.19	Table 23
B	Average Loan Requirement for Capital Investment	Rs Cr.	0	173.72	Table 23
C	Cost of Loan for Capital Investment	%	10.98	9.75	Para 3.63
D	Loan for Working Capital Requirement	Rs Cr.	235.81	221.01	Table 21
E	Cost of Loan for Working Capital	%	10.98	9.75	Para 3.63
F	Average Equity	Rs Cr.	247.96	74.45	Table 23
G	Return on Equity, Re	%	17.80	17.99	Para 3.61

S. No.	Particulars	Unit	Submitted by Petitioner	Approved by Commission	Ref.
H	WACC	%	14.48	11.06	Tariff Regulations , 2017
I	RoCE	Rs Cr.	70.06	51.88	I = A * H

FIXED AUXILIARY CONSUMPTION EXPENSES

Petitioner Submission

3.67 The Petitioner has submitted that the Commission has allowed Fixed Auxiliary Consumption expenses (0.5%) @ Normative PLF. Accordingly, Petitioner has calculated Fixed Auxiliary Consumption Expenses for FY 2017-18 as under:

Table 27: Petitioner Submission: Fixed Auxiliary Consumption Expenses

S. No.	Particulars	Unit	FY 2017-18
A	Plant Capacity	Mw	330
B	Normative PLF	%	85
C	Gross Generation	Mu	2457.18
D	Fixed Auxiliary Consumption	%	0.5
E	Fixed Auxiliary Consumption	Mu	12.29
F	Energy Charge Rate @ Normative	Rs/Kwh	3.80
G	Fixed Auxiliary Consumption	Rs Cr	4.66

Commission's Analysis

3.68 The Commission has specified the Auxiliary Energy Consumption for existing generating stations of Delhi in Business Plan Regulations, 2017 and relevant extract is as follows:

"8. NORMS OF OPERATION FOR GENERATING STATIONS:

...

...

(3) AUXILIARY ENERGY CONSUMPTION

Auxiliary Energy Consumption shall be computed in two parts:

- a) Fixed: 0.5% of the generation at normative PLF of the plant capacity which shall form part of other expenses under Fixed Cost, at energy charge rate approved by the Commission in respective Tariff Order.
- b) Variable: 2.0% in Combined Cycle mode and 0.5% in Open Cycle mode of the actual generation which shall form part of computation of energy charge rate of the respective month.”

3.69 Accordingly, the Commission based on the landed price of primary fuel (LPPF) and the weighted average GCV has trued up the Fixed Auxiliary Consumption as follows:

Table 28: Commission Approved: Fixed Auxiliary Consumption Expenses

S. No.	Particulars	UoM	FY 2017-18	Ref.
A	Gross Generation at Normative PLF	MU	2408.04	
B	Fixed Auxiliary Consumption	%	0.5%	Business Plan Regulations, 2017
C	Fixed Auxiliary Consumption	MU	12.29	AxB
D	Energy Charge Rate	Rs/ kWh	3.832	
E	Fixed Auxiliary Consumption Expenses	Rs Cr	4.71	CxD

NON-TARIFF INCOME

Commission's Analysis

3.70 Para 94 of the Tariff Regulations, 2017 specifies the following about Non-Tariff Income (NTI):

“94. The Utility shall submit forecast of Non-Tariff Income to the Commission, in such form as may be stipulated by the Commission from time to time, whose tentative list is as follows:

- (i) Income from rent of land or buildings;
- (ii) Net Income from sale of de-capitalised assets;
- (iii) Net Income from sale of scrap;
- (iv) Income from statutory investments;
- (v) Net Interest on delayed or deferred payment on bills;
- (vi) Interest on advances to suppliers/contractors;
- (vii) Rental from staff quarters;

- (viii) Rental from contractors;
- (ix) Income from Investment of consumer security deposit;
- (x) Income from hire charges from contactors and others, etc.

95. The Non Tariff Income shall be reduced from ARR.”

3.71 Accordingly, the Commission based on the Audited Financial Statements submitted by the Petitioner, has considered the NTI for the Petitioner for FY 2017-18 as under:

Table 29: Commission Approved: LPSC considered as NTI

S. No.	LPSC Details for FY 2017-18	Amount (Rs Cr)
A	LPSC Amount Collected	14.65
B	Principal Amount @18%	81.39
C	LPSC Amount allowed for retention @9.75% (Rate of Interest on Working Capital)	7.94
D	LPSC amount considered as NTI	6.71

Table 30: Commission Approved: Computation of NTI

S. No.	Components of NTI for FY 2017-18	Amount (Rs Cr)
A	Provisions written back	0.04
B	Income on Insurance	0.49
C	Income from Rent	0.01
D	NTI on account of LPSC	6.71
E	Profit from sale of scrap	0.03
F	Profit from sale of de-capitalized assets	0.00
G	Total NTI	7.29

SUMMARY OF FIXED COST

Petitioner's Submission

3.72 The Annual Fixed Cost for FY 2017-18 submitted by the Petitioner is as under:

Table 31: Petitioner Submission: Annual Fixed Cost

S. No.	Particulars	Unit	FY 2017-18
A	Return on Capital Employed	Rs Cr	73.08
B	Depreciation	Rs Cr	13.63
C	Operation and Maintenance Expenses (Incl. DLN (AGP) and STP)	Rs Cr	95.31
D	Fixed Auxiliary Consumption	Rs Cr	4.66
E	Annual Fixed Cost	Rs Cr	186.68

Commission's Analysis

3.73 Regulation 99 of Tariff Regulations, 2017 provides the components for computation of AFC for a generating entity and the relevant clause is as follows:

“99. The annual fixed cost (AFC) of a Generating Entity shall consist of the following components as specified in these Regulations:

Return on Capital Employed;

Depreciation; and

Operation and Maintenance expenses.”

3.74 Accordingly, the Commission has trued up the AFC for FY 2017-18 as follows:

Table 32: Commission Approved: Annual Fixed Cost for FY 2017-18

S. No.	Particulars	UoM	FY 2017-18		Ref.
			Petitioner's Submission	Approved Commission	
A	Return on Capital Employed	Rs Cr	73.08	51.88	Table 26
B	Depreciation	Rs Cr	13.63	13.63	Table 19
C	Operation and Maintenance Expenses	Rs Cr	95.31	92.52	Table 15
D	Fixed Auxiliary Consumption	Rs Cr	4.66	4.71	Table 28
E	Annual Fixed Cost	Rs Cr	186.68	162.74	A+B+C+D
F	NTI	Rs Cr	0	7.29	Table 30
G	Annual Fixed Cost net of NTI	Rs Cr	186.68	155.45	E-F

3.75 The Petitioner is directed to recover/refund, if any, based on the true up of Annual Fixed Cost as indicated in the above table in the next bill to the respective beneficiaries after the issuance of this order.

A4: ANALYSIS OF AGGREGATE REVENUE REQUIREMENT (ARR) FOR FY 2019-20**NORMS OF OPERATION**

4.1 The Commission has specified the norms of operation, for the purpose of determination of tariff in Business Plans Regulations, 2017. The Petitioner has made submissions for relaxation of certain operational norms. The submissions made by the Petitioner in this regard and the Commission's view on the same has been discussed in the following sections.

PLANT AVAILABILITY AND PLANT LOAD FACTOR**Petitioner's Submission**

4.2 The Petitioner has proposed plant availability for FY 2019-20 as follows:

Table 33: Petitioner Submission: Plant Availability for FY 2019-20

Particulars	UoM	FY 2019-20
Plant Availability	%	85%

Commission's Analysis

4.3 The Commission has specified the Normative Annual Plant Availability Factor (NAPAF) and Normative Annual Plant Load Factor (NAPLF) in Business Plan Regulations, 2017 and relevant extract is as follows:

"8. NORMS OF OPERATION FOR GENERATING STATIONS:

(1) Normative Annual Plant Availability Factor and Normative Annual Plant Load Factor for existing generating stations of Delhi shall be as follows:

I. Normative Annual Plant Availability Factor (NAPAF): 85%

II. Normative Annual Plant Load Factor (NAPLF): 85%"

4.4 In view of the above, the Commission has considered Plant Availability and Plant Load Factor as approved in Business Plan Regulations, 2017.

STATION HEAT RATE**Petitioner's Submission**

4.5 The Petitioner has proposed Station Heat Rate for FY 2019-20 as follows:

Table 34: Petitioner Submission: Station Heat Rate for FY 2019-20

Particulars	UoM	FY 2019-20
Station Heat Rate (CC)	kCal/kWh	2000
Station Heat rate (OC)	kCal/kWh	2900

Commission's Analysis

4.6 The Commission has specified the Station Heat Rate (SHR) for existing generating stations of Delhi in Business Plan Regulations, 2017 and relevant extract is as follows :

"8. NORMS OF OPERATION FOR GENERATING STATIONS:

...

...

(2) GROSS STATION HEAT RATE (GHR)

Gross Station Heat Rate for existing generating stations of Delhi shall be as follows:

Table 5: Gross Station Heat Rate (GHR)

Sl.No	Generating Station	Combined Cycle	Open Cycle
		(kCal/ kWh)	
1	Gas Turbine Power Station (GTPS)	2450	3125
2	Pragati Power Station I (PPS-I)	2000	2900

4.7 In view of the above, the Commission has considered Station Heat Rate as approved in Business Plan Regulations, 2017.

AUXILIARY POWER CONSUMPTION**PETITIONER SUBMISSION**

4.8 The Petitioner has proposed Auxiliary Power Consumption for FY 2019-20 as under:

Table 35: Petitioner Submission: Auxiliary Power Consumption

Particulars	UoM	FY 2019-20
Auxiliary Consumption	%	2.5%

Commission's Analysis

4.9 The Commission has specified the Auxiliary Energy Consumption for existing generating stations of Delhi in Business Plan Regulations, 2017 as follows:

"8. NORMS OF OPERATION FOR GENERATING STATIONS:

...

...

(3) AUXILIARY ENERGY CONSUMPTION

Auxiliary Energy Consumption shall be computed in two parts:

- a) Fixed: 0.5% of the generation at normative PLF of the plant capacity which shall form part of other expenses under Fixed Cost, at energy charge rate approved by the Commission in respective Tariff Order.*
- b) Variable: 2.0% in Combined Cycle mode and 0.5% in Open Cycle mode of the actual generation which shall form part of computation of energy charge rate of the respective month."*

4.10 In view of the above, the Commission has considered Auxiliary Power Consumption as approved in the Business Plan Regulations, 2017.

GROSS AND NET GENERATION**Petitioner's Submission**

4.11 The Petitioner has submitted Gross and Net Generation for PPS-I Station for FY 2019-20 as under:

Table 36: Petitioner Submission: Gross and Net Generation for FY 2019-20

S. No.	Particulars	UoM	FY 2019-20
A	Plant Capacity	MW	330
B	PLF	%	85
C	Gross Generation	MU	2463.91
D	Aux. Cons.	%	2.50
E	Aux. Cons.	MU	61.60
F	Net Gen.	MU	2402.31

Commission's Analysis

4.12 Gross and Net Generation for FY 2019-20 approved by the Commission based on the norms of operation specified in Business Plan Regulations, 2017 is as follows:

Table 37: Commission Approved: Gross and Net Generation for FY 2019-20

S. No.	PPS-I	UOM	FY 2019-20	Ref.
A	Capacity	MW	330	
B	NAPLF	%	85	Business Plan Regulations, 2017
C	Gross Generation	MU	2457.18	$(A \times B \times 365 \times 24) / 1000$
D	Auxiliary Consumption	%	2.0%	Business Plan Regulations, 2017
E	Auxiliary Consumption	MU	49.14	CxD
F	Net Generation	MU	2408.04	C-E

ENERGY CHARGE RATE AND VARIABLE COST**Petitioner's Submission**

4.13 The Petitioner has estimated total consumption of Gas as 527.627 MMSCM considering GCV of 9339.605 kCal/SCM at 85% PLF.

4.14 The Petitioner has submitted that the Fuel Cost for FY 2019-20 has been calculated as per Business Plan Regulations, 2017 by considering heat rate of 2000 kCal/kWh in combined cycle mode and 2900 kCal/kWh @ Normative PLF. However, the weighted average price of the Gas has been taken for preceding three months i.e. August to October, 2018 in line with the DERC Regulations, 2017 for FY 2019-20. The weighted average landed price of gas from August to October, 2018 for PPS-I is 24.045 Rs/SCM and weighted average GCV is 9339.605 kCal/SCM

4.15 The Petitioner has computed the fuel cost and variable cost as under:

Table 38: Petitioner Submission: Energy Charge Rate and Fuel Cost

Particulars	Unit	Variable Cost
		FY 2019-20
Total Gas Consumption	MMSCM	527.627
Average Gas Price	Rs./SCM	24.045
Weighted Average GCV	kCal/ SCM	9339.605
Total Gas Cost	Rs. Crores	1268.65
Net Generation	MU	2402.31
Variable Cost - CC	Rs./kWh	5.28

Commission's Analysis

4.16 The Commission has specified the formula for computation of energy charge rate in Tariff Regulations, 2017 as follows:

"103. Energy charge rate (ECR) in Rupees per kWh on ex-power plant basis shall be determined to three decimal places in accordance with the following formulae:

(a) For coal based stations:

$$ECR = \{(GHR - SFC \times CVSF) \times LPPF / CVPF + SFC \times LPSFi + LC \times LPL\} \times 100 / (100 - AUX)$$

(b) For gas and liquid fuel based stations

$$ECR = GHR \times LPPF \times 100 / \{CVPF \times (100 - AUX)\}$$

Where,

AUX = Normative auxiliary energy consumption in percentage

CVPF=(a) Weighted Average Gross calorific value of coal on as received basis from the loaded wagons at the generating stations -in kCal per kg for coal based stations

(b) Weighted Average Gross calorific value of primary fuel as received, in kCal per kg, per litre or per standard cubic meter, as applicable for lignite, gas and liquid fuel based stations.

(c) In case of blending of fuel from different sources, the weighted average Gross calorific value of primary fuel shall be arrived in proportion to blending ratio.

CVSF =Calorific value of secondary fuel, in kCal per ml.

ECR = Energy charge rate, in Rupees per kWh sent out.

GHR =Gross station heat rate, in kCal per kWh.

LC = Normative limestone consumption in kg per kWh.

LPL = Weighted average landed price of limestone in Rupees per kg.

LPPF =Weighted average landed price of primary fuel, in Rupees per kg, per litre or per standard cubic metre, as applicable, during the month. (In case of blending

of fuel from different sources, the weighted average landed price of primary fuel shall be arrived in proportion to blending ratio)

SFC = Normative Specific fuel oil consumption, in ml per kWh.

LPSFi=Weighted Average Landed Price of Secondary Fuel in Rs./ml during the month;

Provided that energy charge rate for a gas/liquid fuel based station shall be adjusted for open cycle operation based on certification of Delhi SLDC for the open cycle operation during the month.

107.Landed Fuel Cost for Tariff Determination: The landed fuel cost of primary fuel and secondary fuel for tariff determination shall be based on actual weighted moving average cost of respective fuel before the start of the tariff period for existing and new generating stations”

- 4.17 Landed Price of Primary fuel and Gross Calorific Value has been computed as per the information available in Form 15 of March 2019, April 2019 and May 2019 submitted by the Petitioner is as follows:

Table 39: Commission Approved: Fuel Parameters considered for determination of ECR

S. No.	Particulars	UoM	March-19	April-19	May-19
1	Quantum	000'SCM	692.70	24278.71	24296.10
2	Cost	Rs Cr	0.47	41.67	57.36
3	GCV	kCal/ SCM	9228.05	9249.60	9375.03
4	LPPF	Rs/ SCM	6.73	17.16	23.61
5	Weighted Average LPPF	Rs/ SCM			20.20
6	Weighted Average GCV	kCal/ SCM			9311.15

- 4.18 Accordingly, the Commission approves the Energy Charge Rate (ECR) and Fuel Cost for FY 2019-20 as follows:

Table 40: Commission Approved: ECR and Fuel Cost for FY 2019-20

S. No.	Particulars	UoM	Petitioner's Submission	Approved Value	Ref.
A	Net Generation	MU	2402.31	2408.04	
B	ECR	Rs/kWh	5.28	4.427	
C	Fuel Cost	Rs Cr	1268.65	1065.97	(AxB)/10

FIXED COST**OPERATION AND MAINTENANCE (O&M) EXPENSES****Petitioner's Submission**

- 4.19 The Petitioner has submitted that they have installed DLN Burner at PPS-I to control the NOx level. These types of burners were installed for the first time in India. The additional R&M expenses towards R&M of DLN burners and for critical components of Gas Turbines are required to be incurred by the PPS-I for the smooth operations of the plant and to achieve the target level of generation. All the inspections and overhauling of the machines are as per the manufactures recommendation. The expenditure on DLN Burners is cyclic in nature and its amount varies from year to year depending upon the type of inspections carried out on the machines based on the running hours.
- 4.20 Further, PPS-I is sourcing plant water requirement from sewage treatment plants (STP). PPS-I has taken over the operation & maintenance of the sewage water treatment plants from Delhi Jal Board for treating the sewerage water from Delhi Gate Nala and Sen Nursing Home Nala. The actual expenditure on this account of above for FY 2014-15 & 15-16 includes expenditure on operation & maintenance, electricity, Chemicals etc.
- 4.21 The Petitioner has requested the Commission to allow the additional expenditure on account of DLN & STP for FY 2019-20 on normative basis and to be trued up at later stage.
- 4.22 The Petitioner has estimated Operation and Maintenance Expenditure (O&M) for FY 2019-20 as under:

Table 41: Petitioner Submission: O&M Expenses

S. No	Particulars	UoM	FY 2019-20
A	Normative O&M expenses	Rs Cr.	65.11
B	Additional R&M expenses allowed by DERC in its tariff order dated 31.08.2017 along with carrying cost	Rs Cr.	0
C	Carrying Cost @ 11.50% on allowed additional R&M Expenses	Rs Cr.	0
D	Additional expenditure on account of DLN Burner	Rs Cr.	15
E	Additional expenditure on account of STP	Rs Cr.	4.85
F	Total O&M Expenses	Rs Cr.	84.96

Commission's Analysis

4.23 The Commission has specified the normative Operation and Maintenance Expenses for existing generating stations of Delhi in Business Plan Regulations, 2017 and relevant extract is as follows:

"6. OPERATION AND MAINTENANCE EXPENSES

(1) Normative Operation and Maintenance expenses in terms of Regulation 4(3) and Regulation 92 of the DERC (Terms and Conditions for Determination of Tariff) Regulations, 2017 for the Generating Entity shall be as follows:

(a) Normative Operation and Maintenance expenses for existing generating stations shall be as follows:

Table 1: O&M Expenses (Rs. Lakh/ MW)

<i>Station</i>	<i>2017-18</i>	<i>2018-19</i>	<i>2019-20</i>
<i>GTPS</i>	<i>29.66</i>	<i>31.32</i>	<i>33.08</i>
<i>PPS I</i>	<i>17.69</i>	<i>18.68</i>	<i>19.73</i>

....

(2) Impact of seventh pay commission on employee cost shall be considered separately, based on actual payment made by the Generation Entity and prudence check at the time of true up of ARR for the relevant financial year."

4.24 Accordingly, the Commission approves the base O&M Expenses for PPS-I Station for FY 2019-20 as follows:

Table 42: Commission Approved: Base O&M Expenses for FY 2019-20

S. No.	Station	Capacity (MW)	Expenses (Rs. Lakh/ MW)	Amount (Rs Cr)
1	PPS-I Station	330	19.73	65.11

4.25 During the prudence check, the Petitioner submitted that due to the impact of implementation of recommendation of 7th pay commission, an interim relief (IR) is being provided to the employees of the Petitioner. An amount of Rs 2.92 Cr has been considered for FY 2019-20 based on the submission of the Petitioner.

4.26 The Commission did not approve any additional expenditure towards O&M in Business Plan Regulations, 2017. Accordingly, the Commission has not considered the

additional expenditure sought by the Petitioner. The same may be considered at the time of true up.

In view of the above, the Commission has approved the O&M Expenses for FY 2019-20 as follows:

Table 43: Commission Approved: O&M Expenses for FY 2019-20

S. No.	Station	Amount (Rs Cr)
1	Base O&M Expenses	65.11
2	IR Amount	2.92
3	TOTAL O&M Expenses	68.03

CAPITAL EXPENDITURE

Petitioner's Submission

4.27 The Petitioner has submitted the Capital Expenditure for FY 2019-20 as follows:

Table 44: Petitioner Submission- Capital Expenditure for FY 2019-20

S. No.	Particulars	Unit	FY 2019-20
A	Opening GFA	Rs Cr	1052.38
B	Addition	Rs Cr	1.92
C	Deletion	Rs Cr	0.00
D	Closing GFA	Rs Cr	1054.30
E	Average GFA	Rs Cr	1053.34

Commission's Analysis

4.28 The Commission has approved the closing GFA for FY 2017-18 as Rs. 1050.38 Cr. The Commission has not considered any capitalization for FY 2018-19 in line with the Business Plan Regulations, 2017. Accordingly, the Commission has approved the Capital Expenditure and closing GFA for FY 2019-20 as follows:

Table 45: Commission Approved: Capital Expenditure

S. No.	Particulars	UoM	FY 2019-20		Ref.
			Petitioner Submission	Approved	
A	Opening GFA	Rs Cr	1052.38	1050.38	Para 4.28
B	Addition	Rs Cr	1.92	0	
C	Deletion	Rs Cr	0.00	0	
D	Closing GFA	Rs Cr	1054.30	1050.38	A+B-C
E	Average GFA	Rs Cr	1053.34	1050.38	(A+D)/2

DEPRECIATION**Petitioner's Submission**

4.29 The Petitioner has calculated the Depreciation for FY 2019-20 as under:

Table 46: Petitioner Submission: Details of Depreciation (Rs. Crore)

S. No	Particulars	Unit	FY 19-20
A	Average GFA	Rs Cr.	1053.34
B	Opening Accumulated Depreciation	Rs Cr.	822.74*
C	Balance Depreciation	Rs Cr.	125.27
D	Remaining useful life at the opening of FY 2017-18	Years	9
E	Depreciation	Rs Cr.	13.92

* A depreciation of Rs. 13.72 Crore has been considered for FY 2018-19

Commission's Analysis

4.30 The Commission has specified provisions pertaining to Depreciation in Regulation 78 to 83 of the Tariff Regulations, 2017 and relevant extracts are as follows:

"78. Annual Depreciation shall be computed based on Straight Line Method for each class of asset as specified in Appendix-1 of these Regulations.

79. The base value for the purpose of depreciation shall be the capital cost of the asset approved by the Commission. Depreciation shall be chargeable from the first year of commercial operation and in case of commercial operation of the asset for part of the year, depreciation shall be charged on pro rata basis.

80. The salvage value of the asset shall be considered as 10% and depreciation shall be allowed up to maximum of 90% of the capital cost of the asset:

Provided that any depreciation disallowed on account of lower availability of the generating station or generating unit or transmission system as the case may be, shall not be allowed to be recovered at a later stage during the useful life and the extended life.

81. Land other than the land held under lease shall not be a depreciable asset and its cost shall be excluded from the capital cost while computing depreciable value of the asset.

82. In case of existing assets, the balance depreciable value as on 1st April of any financial year shall be worked out by deducting the cumulative depreciation as

admitted by the Commission up to 31st March of the preceding financial year from the gross depreciable value of the assets.

83. The Depreciation for Life extension projects/scheme shall be allowed in the manner as indicated in Regulation 51 of these Regulations.”

4.31 Further, it is observed that PPS-I Station was commissioned in year 2002-03 and shall complete its useful life by FY 2027-28.

4.32 Accordingly, the Commission has approved the depreciation for FY 2019-20 as follows:

Table 47: Commission Approved: Depreciation for FY 2019-20

S. No.	Particulars	UoM	Approved	Ref
A	Average GFA	Rs Cr	1050.38	Table 45
B	Opening Accumulated Depreciation	Rs Cr	822.65	
C	Balance Depreciation	Rs Cr	122.69	(90% x A)-B
D	Balance useful life at opening of FY 2019-20	Years	9	
E	Depreciation	Rs Cr	13.63	C/D
F	Closing Accumulated Depreciation	Rs Cr	836.28	B+E
G	Average Accumulated Depreciation	Rs Cr	829.46	(B+F)/2
H	Average Net Fixed Asset	Rs Cr	220.92	A-G

*A depreciation amount of Rs 13.63 Cr has been considered for FY 2018-19

WORKING CAPITAL

Petitioner's Submission

4.33 The Petitioner has calculated the Interest on Working Capital as per Tariff Regulations, 2017 which reads as under:

“(2) Open-cycle Gas Turbine/Combined Cycle thermal generating stations as follows:

(a) Fuel Cost for 30 days corresponding to the Normative Annual Plant Availability Factor, duly taking into account mode of operation of the generating station on gas fuel and liquid fuel;

(b) liquid fuel stock for 15 days corresponding to the normative annual plant availability factor, and in case of use of more than one liquid fuel, cost of main liquid fuel duly taking into account mode of operation of the generating stations of gas fuel and liquid fuel;

(c) Maintenance spares @ 30% of Operation and Maintenance expenses specified in this Regulation;

(d) Receivables equivalent to two months of capacity charge and energy charge for sale of electricity calculated on normative plant availability factor, duly taking into

account mode of operation of the generating station on gas fuel and liquid fuel;
and

(e) Operation and maintenance expenses for one month.

85. Rate of Interest On Working Capital shall be considered as the bank rate as on 1st April of the year plus margin as specified by the Commission for the Control Period and shall be trued up on the basis of prevailing bank rate as on 1st April of the respective financial year:

Provided that the rate of interest availed through open tendering process (Competitive Bidding) among Scheduled Banks, Financial Institutions etc., shall not be trued up.

86. Interest on working capital shall be payable on normative basis notwithstanding that the Utility has availed any loan for the working capital.”

4.34 The Petitioner has submitted that the fuel cost is increasing continuously. This increase in prices of fuel had substantial impact on certain components considered in the computation of working capital and resulting in increasing the interest on working capital. Therefore the considerable increase in interest amount in comparison to the interest allowed by the Commission.

4.35 The Petitioner has calculated working capital for FY 2019-20 as under:

Table 48: Petitioner Submission: Requirement of Working Capital

S. No.	Particulars	Unit	FY 2019-20
A	Fuel expenses for 1 month	Rs Cr	105.72
B	Maintenance spares @ 30% of O&M	Rs Cr	25.49
C	O&M expenses for 1 month	Rs Cr	7.08
D	Annual Fixed Cost for the year	Rs Cr	188.04
E	Fuel Cost for the year	Rs Cr	1268.65
F	Receivables equivalent to 2 months of capacity and energy charge	Rs Cr	242.78
G	Total Working Capital	Rs Cr	381.07

Commission's Analysis

4.36 Regulation 84 of the Tariff Regulations, 2017 deals with computation of Working Capital requirement as follows:

“84. The Commission shall calculate the Working Capital requirement for:

(2) Open-cycle Gas Turbine/Combined Cycle thermal generating stations as follows:

- (a) Fuel Cost for 30 days corresponding to the Normative Annual Plant Availability Factor, duly taking into account mode of operation of the generating station on gas fuel and liquid fuel;
- (b) Liquid fuel stock for 15 days corresponding to the normative annual plant availability factor, and in case of use of more than one liquid fuel, cost of main liquid fuel duly taking into account mode of operation of the generating stations of gas fuel and liquid fuel;
- (c) Maintenance spares @ 30% of Operation and Maintenance expenses specified in this Regulation;
- (d) Receivables equivalent to two months of capacity charge and energy charge for sale of electricity calculated on normative plant availability factor, duly taking into account mode of operation of the generating station on gas fuel and liquid fuel; and
- (e) Operation and maintenance expenses for one month.”

4.37 Accordingly, Working Capital requirement for FY 2019-20 has been computed as follows:

Table 49: Commission Approved: Working Capital Requirement for FY 2019-20

S.No.	Particulars	UoM	FY 2019-20		Ref.
			Petitioner Submission	Approved	
A	Fuel expenses for 1 month	Rs Cr	105.72	88.83	
B	Maintenance spares @ 30% of O&M Expenses	Rs Cr	25.49	20.41	Table 42
C	O&M expenses for 1 month	Rs Cr	7.08	5.67	Table 42
D	Receivables equivalent to 2 months of capacity and energy charge	Rs Cr	242.78	203.23	
E	Total Working Capital	Rs Cr	381.07	318.14	A+B+C+D+E

REQUIREMENT OF LOAN AND EQUITY

Petitioner's Submission

4.38 The Petitioner has submitted the requirement of Loan & Equity for FY 2019-20 as under:

Table 50: Petitioner Submission: Requirement of Loan and Equity

S. No.	Particulars	Unit	FY 2019-20
A	Opening GFA	Rs Cr	1052.38
B	Opening Accumulated Depreciation	Rs Cr	822.74
C	Opening NFA	Rs Cr	229.64
D	Opening Equity	Rs Cr	229.64

S. No.	Particulars	Unit	FY 2019-20
E	Opening Loan Requirement	Rs Cr	0.00
F	Depreciation for the year	Rs Cr	13.92
G	Closing NFA	Rs Cr	215.72
H	Closing Equity	Rs Cr	215.72
I	Closing Loan	Rs Cr	0.00
J	Average Loan	Rs Cr	0.00
K	Average Equity	Rs Cr	222.68

Commission's Analysis

4.39 Regulation 63 of the Tariff Regulations, 2017 deals with financing of the capital cost in Debt Equity ratio to be allowed for existing project or scheme and the relevant extract is as follows:

“63. For determination of Tariff, the debt-equity ratio for any project or scheme under commercial operation shall be considered as 70:30:

Provided that:

- (ix) Where equity actually deployed is less than 30% of the capital cost, actual equity shall be considered for determination of tariff;*
- (x) Where equity actually deployed is more than 30% of the capital cost, equity in excess of 30% shall be treated as notional loan;*
- (xi) The equity invested in foreign currency shall be designated in Indian rupees on the date of each investment;*
- (xii) Any grant/contribution/deposit obtained for the execution of the project/scheme shall not be considered as a part of capital structure for the purpose of debt: equity ratio.”*

4.40 In view of the above, the Commission has computed the requirement of loan and equity as under:

Table 51: Commission Approved: Requirement of Loan and Equity

S. No.	Particulars	UoM	Approved	Ref.
A	Average Net Fixed Asset	Rs Cr	220.92	
B	Average Equity	Rs Cr	66.27	30% of A
C	Average CAPEX Loan	Rs Cr	154.64	70% of A
D	Working Capital Loan	Rs Cr	318.14	
E	Average Loan Requirement	Rs Cr	472.79	C+D
F	Average RRB	Rs Cr	539.06	B+E

RETURN ON CAPITAL EMPLOYED**Petitioner's Submission**

4.41 The Petitioner has submitted that the Commission has specified the methodology for allowing Return on Capital Employed in Tariff Regulations, 2017 as follows:

“65. Return on Capital Employed shall be used to provide a return to the Utility, and shall cover all financing costs except expenses for availing the loans, without providing separate allowances for interest on loans and interest on working capital.

66. The Regulated Rate Base (RRB) shall be used to calculate the total capital employed which shall include the Original Cost of Fixed Assets (OCFA) and Working Capital. Capital work in progress (CWIP) shall not form part of the RRB. Accumulated Depreciation, Consumer Contribution, Capital Subsidies / Grants shall be deducted in arriving at the RRB.

67. The RRB shall be determined for each year of the Control Period at the beginning of the Control Period based on the approved capital investment plan with corresponding capitalisation schedule and normative working capital.”

69. Return on Capital Employed (RoCE) for the year “i” shall be computed in the following manner:

$$RoCE = WACC_i * RRB_i$$

Where, WACC_i is the Weighted Average Cost of Capital for each year of the Control Period;

RRB_i – Average Regulated Rate Base for the ith year of the Control Period.

70. The WACC for each year of the Control Period shall be computed at the start of the Control Period in the following manner:

$$WACC = [D/(D+E)] * r_d + [E/(D+E)] * r_e$$

Where, D is the amount of Debt derived as per these Regulations;

E is the amount of Equity derived as per these Regulations;”

4.42 The Petitioner has submitted the estimated RRB for FY 2019-20 as under:

Table 52: Petitioner Submission: RRB

S. No.	Particulars	Unit	FY 2019-20
A	Opening GFA	Rs Cr	1052.38
B	Opening Accumulated Depreciation	Rs Cr	822.74
C	Opening RRB	Rs Cr	229.64
D	Working Capital	Rs Cr	381.07
E	Depreciation for the year	Rs Cr	13.92
F	Net Addition	Rs Cr	1.92
G	Closing RRB	Rs Cr	598.71
H	Average RRB	Rs Cr	604.71

4.43 The Petitioner has considered the rate of interest on loan by considering the Bank Rate as Marginal Cost of Fund based Lending Rate (MCLR) of SBI as notified by the State Bank of India and margin as approved in Business Plan Regulations, 2017. Accordingly, the rate of interest on loan has been considered at 11.23% by taking average rate of MCLR from April-18 to October-18 i.e 8.25% plus margin of 2.98% for FY 2019-20.

4.44 The Petitioner has considered the base rate of return on equity at 14% and the same has been grossed up with rate of income tax at 21.54%. Accordingly grossed up rate of return on equity has been computed at 17.84% for FY 2019-20.

4.45 The Petitioner has computed Weighted Average Cost of Capital (WACC) and Return on Capital Employed (RoCE) for FY 2019-20 as under:

Table 53: Petitioner Submission: WACC and RoCE

S. No.	Particulars	Unit	FY 2019-20
A	Average RRB	Rs Cr	604.71
B	Average Loan Requirement for Capital Investment	Rs Cr	0.00
C	Loan for Working Capital Requirement	Rs Cr	381.07
D	Total Loan	Rs Cr	381.07
E	Average Equity	Rs Cr	222.68
F	Cost of Debt, Rd	%	11.23
G	Return on Equity, Re	%	17.84
H	WACC	%	13.67
I	RoCE	Rs Cr.	82.65

Commission's Analysis

4.46 Regulation 3 and 4 of Business Plan Regulations, 2017 deal with Return on Equity (RoE) and Tax on Return on Equity as follows:

“3. RATE OF RETURN ON EQUITY

Return on Equity in terms of Regulation 4(1) of the DERC (Terms and Conditions for Determination of Tariff) Regulations, 2017 for Generating Entity shall be computed at the Base Rate of 14.00% on post tax basis.

4. TAX ON RETURN ON EQUITY

The base rate of Return on Equity as allowed by the Commission under Regulation 3, shall be grossed up with the Minimum Alternate Tax or Effective Tax Rate of the respective financial year in terms of Regulation 72 and 73 of the DERC (Terms and Conditions for Determination of Tariff) Regulations, 2017, as per the following formula:

$$\text{Rate of Return on Equity} = 14 / [(100 - \text{Tax Rate}) / 100]$$

where, Tax Rate is Minimum Alternate Tax (MAT) or Effective Tax Rate, as the case may be.”

- 4.47 In view of the above, the Commission has considered the base rate of return on equity at 14% and the same has been grossed up with rate of income tax at 21.54%. Accordingly grossed up rate of return on equity has been computed at 17.84% for FY 2019-20.
- 4.48 Regulation 77 of Tariff Regulations, 2017 deal with interest on Loan as follows:

“77. The rate of interest on loan shall be based on weighted average rate of interest for actual loan portfolio subject to the maximum of bank rate as on 1st April of the year plus the margin as approved by the Commission in the Business Plan Regulations for a Control Period:

Provided that in no case the rate of interest on loan shall exceed approved rate of return on equity:

Provided further that if there is no actual loan for a particular year but normative loan is still outstanding, the last available weighted average rate of interest shall be considered:

Provided also that if the Utility does not have actual loan then the rate of interest shall be considered at the bank rate plus margin, as specified by the Commission in the Business Plan Regulations, for the notional loan of the relevant control period:

Provided also that the loan availed through open tendering process (Competitive Bidding) among Scheduled Banks, Financial Institutions etc., shall be considered at the rate discovered through open tendering process.”

- 4.49 Regulation 85 and 86 of Tariff Regulations, 2017 deal with Interest on Working Capital and relevant extract is as follows:

“85. Rate of Interest On Working Capital shall be considered as the bank rate as on 1st April of the year plus margin as specified by the Commission for the Control Period and shall be trued up on the basis of prevailing bank rate as on 1st April of the respective financial year:

Provided that the rate of interest availed through open tendering process (Competitive Bidding) among Scheduled Banks, Financial Institutions etc., shall not be trued up.

86. Interest on working capital shall be payable on normative basis notwithstanding that the Utility has availed any loan for the working capital.”

- 4.50 The Commission has considered the rate of interest on loan by considering the Bank Rate as Marginal Cost of Fund based Lending Rate (MCLR) of SBI as notified by the State Bank of India and margin as approved in Business Plan Regulations, 2017. Accordingly rate of interest on loan has been approved at 11.53% on the basis of SBI MCLR of 8.55% as on 1st April, 2019 plus margin of 2.98%.

- 4.51 Further, the Commission has specified the methodology for allowing Return on Capital Employed in Tariff Regulations, 2017 as follows:

“65. Return on Capital Employed shall be used to provide a return to the Utility, and shall cover all financing costs except expenses for availing the loans, without providing separate allowances for interest on loans and interest on working capital.

66. The Regulated Rate Base (RRB) shall be used to calculate the total capital employed which shall include the Original Cost of Fixed Assets (OCFA) and Working Capital. Capital work in progress (CWIP) shall not form part of the RRB. Accumulated Depreciation, Consumer Contribution, Capital Subsidies / Grants shall be deducted in arriving at the RRB.

67. The RRB shall be determined for each year of the Control Period at the beginning of the Control Period based on the approved capital investment plan with corresponding capitalisation schedule and normative working capital.

68. The Regulated Rate Base for the i th year of the Control Period shall be computed in the following manner:

$$RRBi = RRB_{i-1} + \Delta ABi / 2 + \Delta WCi;$$

Where,

“ i ” is the i^{th} year of the Control Period;

$RRBi$: Average Regulated Rate Base for the i^{th} year of the Control Period;

ΔWCi : Change in working capital requirement in the i^{th} year of the Control Period from $(i-1)^{\text{th}}$ year;

ΔABi : Change in the Capital Investment in the i th year of the Control Period;

This component shall be arrived as follows:

$$\Delta ABi = Invi - Di - CCI - Ret_i;$$

Where,

$Invi$: Investments projected to be capitalised during the i^{th} year of the Control Period and approved;

Di : Amount set aside or written off on account of Depreciation of fixed assets for the i^{th} year of the Control Period;

CCI : Consumer Contributions, capital subsidy / grant pertaining to the ΔABi and capital grants/subsidies received during i th year of the Control Period for construction of service lines or creation of fixed assets;

Ret_i: Amount of fixed asset on account of Retirement/ Decapitalisation during ith Year;

RRB i-1: Closing Regulated Rate Base for the Financial Year preceeding the ith year of the Control period. For the first year of the Control Period, Closing RRB i-1 shall be the Opening Regulated Rate Base for the Base Year i.e. RRBO;

$$RRBO = OCFAO - ADO - CCO + WCO;$$

Where;

OCFAO: Original Cost of Fixed Assets at the end of the Base Year;

ADO: Amounts written off or set aside on account of depreciation of fixed assets pertaining to the regulated business at the end of the Base Year;

CCO: Total contributions pertaining to the OCFAo, made by the consumers, capital subsidy / grants towards the cost of construction of distribution/service lines by the Distribution Licensee and also includes the capital grants/subsidies received for this purpose;

WCO: working capital requirement in the (i-1)th year of the Control Period.

69. Return on Capital Employed (RoCE) for the year "i" shall be computed in the following manner:

$$RoCE = WACC_i * RRBi$$

Where,

WACC_i is the Weighted Average Cost of Capital for each year of the Control Period;

RRBi – Average Regulated Rate Base for the ith year of the Control Period.

70. The WACC for each year of the Control Period shall be computed at the start of the Control Period in the following manner:

$$WACC = \left[\frac{D}{D + E} \right] * r_d + \left[\frac{E}{D + E} \right] * r_e$$

Where,

D is the amount of Debt derived as per these Regulations;

E is the amount of Equity derived as per these Regulations;

Where equity employed is in excess of 30% of the capital employed, the amount of equity for the purpose of tariff shall be limited to 30% and the balance amount shall be considered as notional loan. The amount of equity in excess of 30% treated as notional loan. The interest rate on excess equity shall be the weighted average rate of interest on the actual loans of the Licensee for the respective years. Where actual equity employed is less than 30%, the actual equity and debt shall be considered;

Provided that the Working capital shall be considered 100% debt financed for the calculation of WACC;

rd is the Cost of Debt;

re is the Return on Equity.”

- 4.52 Accordingly, the Commission has computed Return on Capital Employed for FY 2019-20 as follows:

Table 54: Commission Approved: Return on Capital Employed

S. No.	Particulars	UoM	FY 2019-20		Ref.
			Petitioner's Submission	Approved	
A	Average Net Fixed Asset	Rs Cr	-	220.92	Table 51
B	Average Equity	Rs Cr	222.68	66.27	30% of A
C	Average CAPEX Loan	Rs Cr	0	154.64	70% of A
D	Working Capital Loan	Rs Cr	381.07	318.14	Table 49
E	Average Loan Requirement	Rs Cr	381.07	472.79	C+D
F	Average RRB	Rs Cr	604.71	539.06	B+E
G	Grossed up Rate of Return on Equity	%	17.84	17.84	Para 4.47
H	Rate of Interest on Loan	%	11.23	11.53	Para 4.50
I	Weighted Average Cost of Capital (WACC)	%	13.67	12.31	(B/F)*G+(E/F) *H
J	RoCE	Rs Cr	82.65	66.34	I*F

FIXED AUXILIARY CONSUMPTION EXPENSES**Petitioner's Submission**

4.53 The Petitioner has projected Fixed Auxiliary Consumption Expenses for FY 2019-20 is as under:

Table 55: Petitioner Submission: Fixed Auxiliary Consumption Expenses

S. No.	Particulars	Unit	FY 2019-20
A	Plant Capacity	MW	330
B	Normative PLF	%	85
C	Gross Generation	MU	2463.91
D	Fixed Auxiliary Consumption	%	0.5
E	Fixed Auxiliary Consumption	MU	12.32
F	Energy Charge Rate @ Normative	Rs/kWh	5.28
G	Fixed Auxiliary Consumption	Rs Cr	6.51

Commission Analysis

4.54 The Commission allows Fixed Auxiliary Consumption Expenses as per the Regulation 8(3) of DERC (Business Plan) Regulations, 2017. The relevant extract is as follows:

"8. NORMS OF OPERATION FOR GENERATING STATIONS:

...

...

(3) AUXILIARY ENERGY CONSUMPTION

Auxiliary Energy Consumption shall be computed in two parts:

- a) Fixed: 0.5% of the generation at normative PLF of the plant capacity which shall form part of other expenses under Fixed Cost, at energy charge rate approved by the Commission in respective Tariff Order.*
- b) Variable: 2.0% in Combined Cycle mode and 0.5% in Open Cycle mode of the actual generation which shall form part of computation of energy charge rate of the respective month."*

4.55 Accordingly, Fixed Auxiliary Consumption Expenses has been determined for FY 2019-20 as follows:

Table 56: Commission Approved: Fixed Auxiliary Consumption Expenses

S. No.	Particulars	UoM	FY 2019-20	Ref.
A	Gross Generation at Normative PLF	MU	2457.18	
B	Fixed Auxiliary Consumption	%	0.5%	
C	Fixed Auxiliary Consumption	MU	12.29	A x B
D	Energy Charge Rate	Rs/ kWh	4.427	
E	Fixed Auxiliary Consumption Expenses	Rs Cr	5.44	(Cx D)/10

NON-TARIFF INCOME

Commission's Analysis

4.56 Para 94 of the Tariff Regulations, 2017 specifies the following about Non-Tariff Income (NTI):

"94. The Utility shall submit forecast of Non-Tariff Income to the Commission, in such form as may be stipulated by the Commission from time to time, whose tentative list is as follows:

- (i) *Income from rent of land or buildings;*
- (ii) *Net Income from sale of de-capitalised assets;*
- (iii) *Net Income from sale of scrap;*
- (iv) *Income from statutory investments;*
- (v) *Net Interest on delayed or deferred payment on bills;*
- (vi) *Interest on advances to suppliers/contractors;*
- (vii) *Rental from staff quarters;*
- (viii) *Rental from contractors;*
- (ix) *Income from Investment of consumer security deposit;*
- (x) *Income from hire charges from contactors and others, etc.*

95. The Non Tariff Income shall be reduced from ARR."

4.57 The Petitioner has not projected NTI in its Tariff Petition. Accordingly, the NTI shall be considered at the time of true up of FY 2019-20.

SUMMARY OF FIXED COST**Petitioner's Submission**

4.58 The Petitioner based on the provisions of Tariff Regulations, 2017 has estimated the AFC for FY 2019-20 as follows:

Table 57: Petitioner Submission: Annual Fixed Cost

S. No.	Particulars	Unit	FY 2019-20
A	Return on Capital Employed	Rs Cr	82.65
B	Depreciation	Rs Cr	13.92
C	Operation and Maintenance Expenses (Incl. DLN (AGP) and STP)	Rs Cr	84.96
D	Fixed Auxiliary Consumption	Rs Cr	6.51
E	Annual Fixed Cost	Rs Cr	188.04
F	Net Generation	MU	2402.31
G	Fixed Cost Per Unit	Rs/ kWh	0.78

Commission's Analysis

4.59 Regulation 99 of Tariff Regulations, 2017 provides components to be considered for computation of Annual Fixed Cost for a Generating Entity and relevant extract is as follows:

"99. The annual fixed cost (AFC) of a Generating Entity shall consist of the following components as specified in these Regulations:

Return on Capital Employed;

Depreciation; and

Operation and Maintenance expenses"

4.60 Accordingly, the Commission approves the Annual Fixed Cost for FY 2019-20 by considering the various components as follows:

Table 58: Commission Approved: Annual Fixed Cost for FY 2019-20

S. No.	Particulars	UoM	FY 2019-20		Ref.
			Petitioner's Submission	Approved Commission	
A	Return on Capital Employed	Rs Cr	82.65	66.34	Table 54
B	Depreciation	Rs Cr	13.92	13.63	Table 47
C	Operation and Maintenance Expenses	Rs Cr	84.96	68.03	Table 43
D	Fixed Auxiliary Consumption	Rs Cr	6.51	5.44	Table 56
E	Annual Fixed Cost	Rs Cr	188.04	153.44	A+B+C+D

A5: DIRECTIVES ISSUED BY THE COMMISSION

- 5.1 The Commission directs the Petitioner to ensure that the fuel supply agreement does not contain the "Minimum Off Take Guarantee" clause linked with "Take or Pay" obligation, so as to optimize the cost of generation. Any cost incurred on account of such clause shall not be allowed to be billed to the beneficiaries and the liability on this count shall be solely to the account of the petitioner. The petitioner shall be allowed to recover only the actual cost of fuel (including fuel price adjustment/Power Purchase Cost Adjustments, if any but excluding cost on account of "Minimum Off Take Guarantee" / "Take or Pay" obligation) from the respective beneficiaries.
- 5.2 The Commission directs the Petitioner to ensure that the fuel procured should be strictly utilized only for the purpose of power generation, failing which the associated cost would be disallowed in full.
- 5.3 The Commission directs the Petitioner to furnish information related to Energy Charge Rate as per Form-21 of Tariff Regulations, 2017 along with monthly invoice to the beneficiaries. Source wise fuel details are to be provided in the said form and the same is to be uploaded on Petitioner's website on monthly basis.
- 5.4 Save and except the penalty as specifically provided in these directives, in all other cases, the punishment for non-compliance of directions of the Commission shall be dealt as per the Section 142 of the Electricity Act, 2003.



DELHI ELECTRICITY REGULATORY COMMISSION

Vinayak Bhawan, 'C' Block, Shivaji, Mahliya Nagar, New Delhi- 110017.

F.11/1653/DERC/2018-19/

Petition No. 12/2019

In the matter of: **Petition for true up of tariff for FY 2017-18 and determination of ARR for the Financial Year 2019-20 for PPS-I.**

Pragati Power Corporation Ltd.
Through its : Director (Tech.)
Himachl. Rajghat Power House Complex
New Delhi 110 002

...Petitioner/Licensee

Coram:

Hon'ble Mr. Justice S S Chauhan, Chairperson

Appearance:

1. Mr. Amit Kansal, IPGCL

INTERIM ORDER

(Date of Hearing: 20.02.2019)

(Date of Order: 21.02.2019)

1. The representative of the Petitioner states that the instant Petition has been filed by M/s. Pragati Power Corporation Ltd. for True-up of tariff for FY 2017-18 and determination of ARR for the Financial Year 2019-20 for PPS-I.
2. The Petition has been scrutinised and found generally in order as per the DERC Comprehensive [Conduct of Business] Regulations, 2001,
3. The Petition is admitted. Further, the Petitioner shall furnish clarifications/additional information, if and when required by the Commission.


(Justice S S Chauhan)
Chairperson

**LIST OF RESPONSES RECEIVED FROM STAKEHOLDERS ON THE APPROVAL OF TRUE UP OF PETITION
FOR TRUING UP OF EXPENSES UPTO FY 2017-18 AND ARR TARIFF PETITION FOR FY 2019-20**

S. No.	R. No.	Name	Address	Date of Receipt
1.	1	Sh. S.R. Abrol	L-2-97B, DDA, LIG Kalkaji, New Delhi 110 019 Nyayabhoomi2003@gmail.com	18.03.2019
2.	2 2A 2B	Sh. V.K. Malhotra General Secretary	DVB Engineers' Association D-3, Vikas Puri, New Delhi 110 018	29.03.2019
3.	3	Sh. Praveen Chawla	praveenkumarchawla@gmail.com	29.03.2019
4.	4 4A 4B 4C	Sh. B.S. Sachdev President	Elderly Peoples Forum B-2/13A, Keshav Puram, Delhi 110 035	28.03.2019 30.03.2019 10.06.2019 25.01.2019
5.	5	Sh. Ashok Gupta	Udyog Nagar Factory Owner's Association, Z-101, (Opp. H-18), Udhyog Nagar, Rohtak Road, Delhi 110 041	28.03.2019
6.	6 6A	Sh. Ashok Bhasin	North Delhi Residents Welfare Association, 1618, Main Chandrawal Road Delhi 110 007 Ashok.bhasin2015@gmail.com	27.03.2019 10.07.2019
7.	7	Sh. S.B. Kuchhal	Legal Advisor, Kothi No. 1, Road No. 32 East Punjabi Bagh, New Delhi 110 026	29.03.2019
8.	8 8A 8B 8C	Sh. Malay Saha General Manager	Delhi Metro Rail Corporation Ltd. Metro Bhawan, Fire Brigade Lane, Barakhamba Road, New Delhi 110 001	05.04.2019
9.	9 9A 9B 9C	Sh. Mukesh Kumar Sharma	Delhi Transco Limited Shakti Sadan, Kotla Road, New Delhi 110 002	05.04.2019
10.	10	Sh. Sunil Gupta	Pension Fighters 11/12, Guru Ram Das Nagar, Main Market, Laxmi Nagar, Delhi 110 092 pensionfighters@gmail.com	05.04.2019
11.	11	Sh. Rajan Gupta	Delhi Electricity Consultative	05.04.2019

S. No.	R. No.	Name	Address	Date of Receipt
		Former Member	Council, H. No. 355, Udyan, Nerala Delhi 110 040	
12.	12	Dr. Arun Kumar Chairman	Dignity Restoration & Grievance Settlement Association B4/84/2, Safdarjung Enclave, New Delhi 110 029 director@dignityindia.org .	08.04.2019
13.	13 13A	Sh . H.M. Sharma	146FF, Vinodbapuri, Lajpat Nagar- 2, New Delhi 110 024 hemantahemanta@rediffmail.com	06.05.2019 12.07.2019
14.	14	Er. Sarabjit Roy National Convenor	Sroy.mb@gmail.com	06.04.2019
15.	15 15A	Sh. Saurabh Gandhi Gen. Secretary	United Residents of Delhi – URD C-6/7, Rana Pratap Bagh, Delhi 110 007 urdrwas@gmail.com	06.04.2019 11.07.2019
16.	16 16A	Sh. Vipin Gupta	A-17, Antriksh Apartments New Town Co-Op. Group Housing Society Ltd. Sector 14-Extn. Rohini Delhi 110 085 Vipin.bfi@gmail.com	08.04.2019 04.05.2019
17.	17	Sh. Kailash Jain	198, Dr. Mukherjee Nagar, Delhi 110 009 kcjcd@gmail.com	06.04.2019
18.	18	Ms. Neeta Gupta	Neetagupta.vg111@gmail.com	06.04.2019
19.	19 19A 19B 19C 19D	Sh. B.P. Agarwal Advocate,	Bpagarwal57@gmail.com	05.04.2019
20.	20 20A	Sh. Jagdish Khetarpal	jagdishpowerip@yahoo.co.in	06.04.2019 11.07.2019
21.	21	Sh. A.K. Datta	222, Pocket E, Mayur Vihar Phase II, Delhi 110 091 mmathur2001@yahoo.com	05.04.2019
22.	22	Sh. Kuldeep Kumar General Secretary	Delhi State Electricity Workers Union, L-2, main Road, Brampuri, Delhi 110 094	04.04.2019
23.	23	Sh. B.S. Vohra President	East Delhi RWAs Joint Front, F-19/10, Krishna Nagar, Delhi 110 051	04.04.2019
24.	24	Sh. C.P. Awasthi	Federation of All Resident	04.04.2019

S. No.	R. No.	Name	Address	Date of Receipt
		Secretary	Welfare Association 81, Venus Apartment, Rohtak Road, Paschim Vihar, New Delhi 110 087 Awasthichandra1@gmail.com	
25.	25	Sh. Vikas Gotwani	Vgotwani_0409@yahoo.co.in	22.04.2019
26.	26 26A 26B	Sh. Bharat Kumar Bhadawat Head (Regulatory and Legal)	Tata Power Delhi Distribution Ltd. NDPL House, Hudson Lines Kingsway Camp, Delhi 110 009	26.04.2019
27.	27	Sh. S.B. Kuchhal	Kothi No. 1, Road No. 32, East Punjabi bagh, New Delhi 110 026	02.05.2019
28.	28	Sh. Suresh Kumar	C-116, Yadav Nagar, Samaypur Badli, Delhi	06.05.2019
29.	29	Sh. Rakesh	B-312, Saraswati Vihar, Pitam Pura, Delhi 110 034,	06.05.2019
30.	30	Sh. Rajesh Kumar	B-312, Saraswati Vihar, Pitam Pura, Delhi 110 034,	06.05.2019
31.	31	Sh. Sushil Kumar Jain	B-312, Saraswati Vihar, Pitam Pura, Delhi 110 034,	06.05.2019
32.	32	Sh. Sunil Dutt	B-312, Saraswati Vihar, Pitam Pura, Delhi 110 034	06.05.2019
33.	33	Sh. Bale Ram	B-312, Saraswati Vihar, Pitam Pura, Delhi 110 034	06.05.2019
34.	34	Sh. Ardesh	B-312, Saraswati Vihar, Pitam Pura, Delhi 110 034	06.05.2019
35.	35	Sh. Narendra Kumar	B-312, Saraswati Vihar, Pitam Pura, Delhi 110 034	06.05.2019
36.	36	Sh. Uma Shankar Aggarwal	B-312, Saraswati Vihar, Pitam Pura, Delhi 110 034	06.05.2019
37.	37	Sh. Pratap Singh	B-312, Saraswati Vihar, Pitam Pura, Delhi 110 034	06.05.2019
38.	38	Sh. Santosh Kumar	B-312, Saraswati Vihar, Pitam Pura, Delhi 110 034	06.05.2019

S. No.	R. No.	Name	Address	Date of Receipt
39.	39	Sh. Vikas	B-312, Saraswati Vihar, Pitam Pura, Delhi 110 034	06.05.2019
40.	40	Sh. Ram Nivas	B-312, Saraswati Vihar, Pitam Pura, Delhi 110 034	06.05.2019
41.	41	Sh. Mintu	B-312, Saraswati Vihar, Pitam Pura, Delhi 110 034	06.05.2019
42.	42	Sh. Rajender	B-312, Saraswati Vihar, Pitam Pura, Delhi 110 034	06.05.2019
43.	43	Sh. Surender Singh	H. No. 525, Main Narela Road, Near WaterTan, Aliput, Delhi	06.05.2019
44.	44	Sh. Udham Singh	H. No. 521, Main Narela Road, Near WaterTan, Aliput, Delhi	06.05.2019
45.	45	Sh. Rajesh Kumar	H. No. 442, Main Narela Road, Near WaterTan, Aliput, Delhi	06.05.2019
46.	46	Sh. Naresh Sharma	E-17, Yadav Nagar, Samaypur Badli, Delhi 1100 42	06.05.2019
47.	47	Sh. Kuldip Singh	B-312, Saraswati Vihar, Pitam Pura, Delhi 110 034	06.05.2019
48.	48 48A	Sh. Hari Ram Bhardwaj	DVB Pensioners Association Rajghat Power House, New Delhi - 110 002	10.05.2019 16.04.2019
49.	49 49A 49B	SH. Ravi Shandiliya Sr. Manager	BSES Rajdhani Power Ltd. BSES Bhawan, Nehru Place, New Delhi 110 019	08.05.2019
50.	50	Sh. Shekhar Saklani Power Management	BSES Yamuna Power Ltd. Karkardooma, Delhi	16.05.2019
51.	51	Sh. Ishwar Dutt	B-1280, Vijay park, Maujpur, New Delhi 110053	16.05.2019
52.	52	Sh. S.R. Narasimhan Treasurer	Ridge Castle Welfare Association Ridge Castle Apartments Dada bari Road, Ward 8, Mehrauli, New Delhi 110 030	07.06.2019
53.	53	Sh. Nikhil Kumar DD (Admn.)	Employees' State Insurance Corporation Hospital, Okhla	12.06.2019
54.	54.	Sh. Amit Kansal Dy. Manager (Comml.) IPGCL	Indraprastha Power Generation Company Limited Regd. Off: "Himadri", Rajghat Power House Complex, New Delhi 110002	18.06.2019
55.	55.	Sh. Amit Kansal Dy. Manager (Comml.) IPGCL	Indraprastha Power Generation Company Limited Regd. Off: "Himadri", Rajghat Power House Complex, New Delhi 110002	20.06.2019
56.	56.	Sh. S.P Gupta	DVB Engineers (Pensioners)	21.06.2019

S. No.	R. No.	Name	Address	Date of Receipt
		President	Forum, BN-142, (West) Shalimar Bagh, Delhi 110088	
57.	57. 57A	Sh. Satish Joshi	Satish_i@hotmail.com	28.06.2019 12.07.2019
58.	58	Sh. K.N. Vasudeva	47A, DDA, MIG Flats Pocket-C, Phase-III, Ashok Vihar Delhi 110 052	27.06.2019
59.	59	Ms. Bhawna Luthra	Leadership for Environment and Development (LEAD) India M-8, 3 rd Floor, Greater Kailash Part 1, New Delhi 110 048	02.07.2019
60.	60 60A	Sh. Sanjay Gupta	C-4/15, Model Town, 3 Delhi 110 009 sanjayrasons@gmail.com	03.07.2019 12.07.2019
61.	61	Sh. Suhail Khan President	Sofia Educational and Welfare Society, 663, Street No. 6, Old Mustafabad, Delhi 110 094	05.07.2019
62.	62	Sh. Prahlad Singh	H.No. 467, Bakhtawar Pur, Delhi 110 036	04.07.2019
63.	63	Sh. Brij Mohan Garg President	Federation of Wazirpur Vidhan Sabha Welfare Association BA-5A, Ashok Vihar, Phase -1, Delhi 110 052	08.07.2019
64.	64	Sh. Kulwant Singh President	Dilshad Colony Resident Welfare Association (Regd.) F-167, Ground Floor, Dilshad Colony, Delhi 110 095	08.07.2019
65.	65 65A	Sh. S.M. Verma Director (Tech.)	Pragati Power Generation Co. Ltd., Regd. Off: "Himadri", Rajghat Power House Complex, New Delhi 110002	08.07.2019 08.07.2019
66.	66	Sh. Nanak Chand Jain President	Wazirpur Factories Association C-8-2, Wazirpur Industrial Area, Delhi 110 052	08.07.2019
67.	67	Sh. Balkishan Gupta	Sudhar Samiti Durga Puri, 1449/22, Gali No. 9, Durga Puri, Shahdra, Delhi 110 093	08.07.2019
68.	68	Sh. Umesh Anand President	Association of Entrepreneurs of DDA Sheds Okhla Phase I & II Mandi Complex, DDA Sheds, Okhla Industrial Area, Phase-I, New Delhi 110 020	08.07.2019
69.	69	Mr. Arvind Mehta President	542, Double Storey, New Rajinder Nagar, New Delhi 110	10.07.2019

S. No.	R. No.	Name	Address	Date of Receipt
			060	
70.	70	Mr. Tanay Gupta Gen. Secretary	Delhi Petrol Dealers Association (Regd.), 3/8, Asaf Ali Road, New Delhi 110 002	02.05.2019
71.	71	Mr. Saurabh Kumar Managing Director	Energy Efficiency Services Limited, 4 th Floor, Sewa Bhawan, R.K. Puram, New Delhi 110 066	02.05.2019
72.	72	Mr. Pankaj Chhabra	323, Dr. Mukherjee Nagar, Delhi 110 009 pankajchhabra 323@gmail.com	18.03.2019
73.	73	Mr. Satish Nambardar	H.No. 890, Panna Mojan, Bawana, New Delhi 110 039	21.05.2019
74.	74	Superintending Engineer Electrical SDMC	South Delhi Municipal Corporation, Room No. 205, 02 nd Floor, E-Block, Dr. S.P. M. Civic Centre, Jawaharlal Nehru Marg, Minto Road, New Delhi 110 002	13.05.2019
75.	75	Mr. Padam Jain	Jain292@gmail.com	23.05.2019
76.	76	Mr. S.K. Gupta	Sector, 23, Rohini Delhi 110 086 Sk Gupta876@gmail.com	07.06.2019
77.	77	Mr. Kailash Jain	Dr. Mukherjee Nagar Niwasi Manch kcjqcd@gmail.com	03.06.2019
78.	78	Mr. Aman Singhal	Amansinghal220@gmail.com	11.06.2019
79.	79	Mr. Piyush Garg	Piyshgarg814@gmail.com	11.06.2019
80.	80	Mr. Rajesh Garg	Engineers Association Okhla, Y-35, Okhla Industrial Area, Phase-II, New Delhi 110 020	08.07.2019
81.	81	Mr. Sanjay Kumar	Sanjaykumarsisodiya1974@gmail.com	09.07.2019
82.	82	Mr. Guvind Ram Luthra	A-114, Second Floor, Vivek Vihar-II, Delhi Manishluthra04@gmail.com	09.07.2019
83.	83	Mr. Gurdip Singh President	Krishna Market Pahar Ganj, Residents & Shopkeepers Welfare Society (Regd.) 5147, Pahar Ganj, Krishna Market, New Delhi 110 055	09.07.2019
84.	84	Sh. Jaipal Singh Verma, President	School Block Residents Welfare Association, S-305, School Block, Shakarpur, Delhi 110 092	09.07.2019
85.	85	Mr. Parsu Ram Rawat Secretary	B-43, Gali No. 5 Brahmpuri, Delhi 110 053	06.07.2019

S. No.	R. No.	Name	Address	Date of Receipt
			Ryashpal1@gmail.com	
86.	86	Mr. Ompal Singh Ahlawat Former President	E-186, Chattarpur Extension New Delhi 110 074	11.07.2019
87.	87	Mr. Amit Bhargwa	B-5-44 Azad Apartment Sri Aurobindo Marg, New Delhi 110 016	12.07.2019
88.	88 88A 88B 88C 88D	Mr. Sanjeev Jain	B-94, Gali No. 10, Shashi Garden Patparganj, Delhi 110 091	12.07.2019 12.07.2019 11.07.2019 11.07.2019 11.07.2019
89.	89	Mr. T.P. Maniappan	Federation of Co-operative Group Housing Societies Dwarka Ltd. B-9, Vidyut CGHS Ltd., Plot No. 2, Sector-12 Dwarka New Delhi 110 078	12.07.2019
90.	90	Lt. Col. Paramjit Singh	Paramjit_49@yahoo.com	12.07.2019
91.	91	Mr. Jasvinder Singh Dhir Executive Member	D-2, Block, Janakpuri, New Delhi 110 058	12.07.2019
92.	92	Mr. K.K. Agnihotri Authorised Signatory	Anant Raj projects Limited H-65, Connaught Circus, New Delhi 110 001	12.07.2019
93.	93	Mr. Shilaish Kumar	Sksastro1938@gmail.com	12.07.2019
94.	94	Mr. J.C. Gosain Chairman	918, Dr. Mukherjee Nagar, Delhi 110 009	12.07.2019
95.	95	Dr. Ruby Makhiya Secretary	Navjeevan RWA Navjeevan Vihar, New Delhi 110 017	12.07.2019
96.	96	Sh. Krishan Kumar President	Resident Welfare Association Kakrola Housing Complex, Dwarka, New Delhi 110 078	12.07.2019
97.	97	Mahipal Singh Member	Rattan Vihar, Kiradi Delhi 110 086	11.07.2019
98.	98	Ms. Sarla Devi	W/o Late Nagresh Kumar A-145, G/F Lal Doora, Village, Delhi 110 091	11.07.2019
99.	99	Mr. Rakesh Bhardwaj	145, Gaun Patparganj Delhi 110 091	11.07.2019
100.	100	Real Cause	Real Cause, 174, 1st Floor, Street No. 38, Zakir Nagar, Okhla New Delhi 110 025	11.07.2019
101.	101	Mr. Leju Valsan	IL&FS Environmental	12.07.2019

S. No.	R. No.	Name	Address	Date of Receipt
			Infrastructure & Services Ltd. SDMC Compost Plant, Mathura Road, Okhla, New Delhi Leju.Valsan@ilfsindia.com	
102.	102 102 A	Mr. Sumeet Salhotra	Sumeet.Salhotra@ilfsindia.com	10.07.2019 10.07.2019
103.	103	Mr. Bijender Singh	bs_kotla@yahoo.com	12.07.2019
104.	104	Mr. Jatin Midha Gen. Secretary	Joint Forum of Residents 355, 2nd Floor, Double Storey New rajinder Nagar, New Delhi 110 060	12.07.2019

Annexure - III

STAKEHOLDERS WHO HAVE ATTENDED THE HEARING FOR THE PETITION FILED BY DISCOMS, GENCOS, AND TRANSCO ON THE APPROVAL PETITION FOR TRUING UP OF EXPENSES UPTO FY 2017-18 AND ANNUAL TARIFF PETITION FOR FY 2019-2020

S. No.	Name	Address
1	SH. JAG MOHAN	DMRC
2	SH. YOGENDRA SATI	DMRC
3	SH. NITIN TYAGI	MLA, LAXMI NAGAR
4	SH. AVNEESH KUMAR TYAGI	LAXMI NAGAR
5	SH. SANDEEP MALHOTRA	IL&FS
6	SH. HEMANT PALIWAL	LAXMI NAGAR
7	SH. RITURAJ GOVIND	MLA, KIRARI
8	SH. DHARMENDRA KUMAR	RWA, KIRARI
9	MS. SARITA SINGH	MLA, ROHTASH NAGAR
10	SH. VIJAY KUMAR	NEW MODERN SHAHDARA
11	SH. MAHABIR SINGH	ROHTASH NAGAR
12	SH. GAUTAM KUMAR	PRATAP VIHAR
13	SH. JAVED	NAND NAGARI
14	SH. HARI CHAND	ROHTASH NAGAR
15	SH. SUNNY KUMAR	RAM NAGAR
16	SH. RAVINDRA KUMAR	KIRARI
17	SH. JASVEER	SULEMAN NAGAR
18	SH. PARVESH KUMAR	ASHOK NAGAR
19	SH. RAKESH KUMAR	PREM NAGAR
20	SH. ASHOK BHASIN	NDRWF
21	SH. B.L. VERMA	NDRWF
22	SH. DALIP KUMAR	KAROL BAGH
23	SH. PREET KUMAR	ROHTASH NAGAR
24	SH. MUREED RAJ	KIRARI
25	SH. GURDIP SINGH	RWA, PAHAR GANJ
26	SH. ASHOK KUMAR SHARMA	ROHTASH NAGAR
27	SH. LALITESH SHARMA	ROHTASH NAGAR
28	SH. CHANDRAKANT SHRIVAS	DMRC
29	SH. SUKHDEV RAJ ABROL	KALKAJI
30	SH. SHUBHAM KUMAR	DMRC
31	SH. RATAN KUMAR	DMRC
32	SH. DOKIPARTNI SIVAKAR	DMRC
33	SH. LEJUS VALSAN	IL&FS
34	SH. SAURABH BHARDWAJ	MLA, CHIRAG DELHI
35	SH. SANDEEP SINGH	KIRBI PLACE
36	SH. SURENDER SINGH	MLA, DELHI CANTT.
37	SH. PRADEEP	DELHI CANTT.
38	SH. SAWAN KUMAR	DELHI CANTT.
39	SH. ANKIT BHARDWAJ	MOTI BAGH
40	SH. SURENDER DHYAN	DELHI CANTT
41	SH. SANDEEP PAWAR	DELHI CANTT
42	SH. DEELIP KUMAR	DELHI CANTT
43	SH. AKHTAR KHAN	R K PURAM
44	SH. MD. TARIQ,	DELHI CANTT

S. No.	Name	Address
45	SH. SHIV RAM	TELIKHAND VILLAGE
46	SH. GURMEET	DELHI CANTT
47	SH. M K AGGARWAL	RWA, SHAHDARA
48	SH. LOK NATH ANAND	SHAKUR BAST, RANI BAGH
49	SH. V K TALWAR	RANI BAGH
50	SH. PRITAM SINGH	MADANPUR KHADAR
51	SH. JATIN	DELHI CANTT
52	SH. BAL KISHAN,	RWA, DURGA PURI
53	SH. RISHI PARKASH	ADARSH NAGAR
54	SH. PAWAN	DELHI CANTT
55	SH. VISHNU KUMAR RAWAT	MCD, SOAMI NAGAR
56	SH. BIJENDER SINGH	KISAN UNION
57	SH. PAWAN KUMAR SHARMA	MLA, ADARSH NAGAR
58	SH. VIPIN GUPTA	ADARSH NAGAR
59	SH. AJAY GUPTA	ADARSH NAGAR
60	SH. VIRENDER SINGH	SDMC
61	SH. DINESH KUMAR TANWAR	ADARSH NAGAR
62	SH. S. P. AHUJA	ASIAD VILLAGE
63	SH. ROHIT KUMAR	AZAD PUR
64	SH. SUBODH PANDEY	DMRC
65	SH. SANJEEV JHA	MLA, BURARI
66	SH. MUKESH KUMAR	BURARI
67	SH. AJAY KUMAR	NDMC
68	SH. RAKESH SHARMA	KADIPUR
69	MS.VANDANA KUMARI	MLA, SHALIMAR BAGH
70	SH. RATNAKAR PANDEY	BURARI
71	SH. SHARVAN KUMAR	BURARI
72	SH.SAJJAN KUMAR	BURARI
73	SH. NIRBHAY KUMAR SINGH	SANT NAGAR
74	SH. ROHIT KUMAR	JAHANGIR PURI
75	SH. MANIAPPAN THEKKUMAKALTILL	SECTOR -12,DWARKA
76	SH. SANJAY KUMAR MISHRA	SHALIMAR BAGH
77	SH. ANIL KUMAR KAUSHIK	BURARI
78	DR. KUNAL TANWAR	RWA, BASAI DHARAPUR
79	SH. PANKAJ JOSHI	SHALIMAR BAGH
80	SH. CHANDAR	SHALIMAR BAGH
81	SH. ARVIND KUMAR MEHTA	JOINT FORUM RESIDENTS, NEW RAJINDER NAGAR
82	SH. JATIN MIDHA	RAJENDER NAGAR
83	SH. JAGDISH KHETARPAL	JANAK PURI
84	SH. AKBAR KHAN	NIZAMUDDIN
85	MS. RAKHI BIRLA	MLA, MANGOL PURI
86	SH. BHUPINDER SINGH BIRLA	MANGOL PURI
87	SH. VIPIN KUMAR	JANGPURA
88	SH. PRAVEEN KUMAR	MLA, JUNG PURA
89	SH. ANIL KUMAR BAJPAYEE	MLA, GANDHI NAGAR
90	SH. GODLY SHARMA	ROHINI
91	SH. RAVINDER KUMAR GAUTAM	JUNG PURA

S. No.	Name	Address
92	SH. MOINUDDIN	JUNG PURA
93	SH. DEVINDER KUMAR SEHARAWAT	MLA, BRIJWASAN
94	SH. RAVINDRA KUMAR GAUTAM	JUNGPURA
95	SH. HEMANT KUMAR	JUNGPURA
96	SH. GAURAV BHANOT	KRISHNA NAGAR
97	SH. RAJESH KUMAR MALYAN	RWA, WAZIRPUR VILLAGE
98	SH. RAJIV KAKRIA	GREATER KAILASH
99	SH. MOHD. IDRIS UMAIR	DJB
100	SH. B.S. VOHRA	EAST DELHI FEDERATION
101	SH. VIJENDER GUPTA	MLA, ROHINI
102	SH. SURESH KUMAR SHARMA	KALKAJI EXTN.
103	SH. RAJAN GUPTA	INDERLOK
104	SH. JAGJIT SINGH	RWA, HAUDSAN LANE
105	SH. DHARMENDER MOGIA	RWA, PITAMPURA
106	SH. PUNEET GUPTA	ANAND NAGAR
107	SH. HARSH ARYA	DMRC
108	SH. MANUJ SINGHAL	DMRC
109	MS. SAVITA	RWA, MEHRAULI
110	SH. VIJAY KUMAR MANN	DMRC
111	SH. HOSHIYAR SINGH	RWA, MEHRAULI
112	SH. OMPAL SINGH	RWA, CHATTARPUR
113	SH. MASTER RAJ SINGH	JAUNTI VILLAGE
114	SH. JAGDISH PRADHAN	MLA, MUSTAFA BAGH
115	SH. OM PARKASH SAHRMA	MLA, VISHWAS NAGAR
116	SH. RAVINDER	KANJHAWALA
117	SH. VINOD KUMAR	PALAM
118	SH. BITTOO KHURANA	PALAM
119	MS. BHAVANA GAUR	MLA, PALAM
120	SH. RAJBIR SINGH	PALAM
121	SH. SANJEEV KUMAR	PALAM
122	SH. RAJENDER KUMAR	PALAM
123	SH. SANDEEP CHAUDHARY	PALAM
124	SH. SANJAY SISODIA	VASUNDHARA ZONE
125	SH. SANJAY GUPTA	MODEL TOWN
126	SH. SANJEEV KUMAR GOEL	PRITAMPURA
127	SH. PRAVEEN RANA	BURARI
128	SH. RAJAN GUPTA	NARELA
129	SH. RAHUL KALRA	EAST OF KAILASH
130	SH. JARNAIL SINGH	MLA, TILAK NAGAR
131	SH. AJIT PAL SINGH	TILAK NAGAR
132	SH. SURINDER SINGH	TILAK NAGAR
133	SH. BHUPINDER SINGH	TILAK NAGAR
134	SH. B. S. VOHRA	RWA, EAST DELHI
135	SH. NEERAJ CHOPRA	RWA, MALVIYA NAGAR
136	SH. JAGDISH RAI BHATIA	RWA, MALVIYA NAGAR
137	SH. SURAJ KUMAR	MANGOL PURI
138	SH. KARAMVIR	MANGOL PURI
139	SH. SANTOSH KUMAR CHOUDHARY	MANGOL PURI

S. No.	Name	Address
140	MS. PUSHPA	MANGOL PURI
141	SH. AJAY	MANGOL PURI
142	SH. JAIPAL SINGH VERMA	RWA, SHAKARPUR
143	SH. RAJ KUMAR	KRISHAN VIHAR
144	SH. MAHIPAL SINGH	RWA, KIRARI
145	SH. VIJENDER SINGH SHEKHAWAT	RWA, KRISHNA VIHAR
146	SH. BALBIR SINGH	INDIRA VIKAS COLONY
147	SH. KAILASH CHANDER JAIN	RWA, MUKHERJEE NAGAR
148	SH. JAGDISH CHANDER GOSAIN	RWA, MUKHERJEE NAGAR
149	SH. RAJESH GUPTA	MLA, WAZIRPUR
150	MS. BHAVISHYA	WAZIRPUR
151	SH. AAHAN	WAZIRPUR
152	SH. DOMNIC PETER	SANDHYA HYDRO POWER
153	SH. DEVENDER SINGH	SIDHARTH BASTI
154	SH. NARENDER PAL AGGARWAL	RWA, BAWANA
155	SH. CHIRANJI LAL	RWA, SHANTI NIKETAN PUBLIC SCHOOL
156	SH. SANJEEV JAIN	PATPAR GANJ
157	SH. RAKESH KUMAR BHARDWAJ	PATPAR GANJ
158	SH. VINAY PRAKASH SINGH	RWA, NARAYANA
159	SH. BUDHSEN SHARMA	NARAINA RING ROAD
160	SH. NEERAJ NIRWAL	DELHI CANTT
161	SH. SAURABH GANDHI	GENERAL SECRETARY, URD
162	SH. A. K. DUTTA	CHAIRMAN, URD
163	SH. BRIJESH MATHUR	COORDINATOR, RC
164	SH. HEMANTA SHARMA	LAJPAT NAGAR
165	SH. B.B. TIWARI	SECRETARY, URD
166	LT. COL. PARAMJIT SINGH	SHALIMAR BAGH
167	SH. JITENDRA KUMAR TYAGI,	PRESIDENT, URD
168	SH. DAYANAND MISRA	RWA, DWARKA
169	SH. RAM NARAYAN SINGH	SECTOR - 12, DWARKA
170	SH. ASHOK KUMAR TIWARI	SECTOR - 12, DWARKA
171	SH. SOMNATH BHARTI	MLA, MALVIYA NAGAR
172	SH. KRISHNA CHOPRA	MALVIYA NAGAR
173	SH. V.K. MALHOTRA,	SHEIKH SARAI
174	SH. SUDHIR SINGH	MALVIYA NAGAR
175	MS. RUBY MAKHIJA	RWA, NAVJIWAN VIHAR
176	SH. KRISHNA KUMAR	RWA, DWARKA
177	SH. PRABHAKAR SINGH	MODEL TOWN
178	SH. B.S. SACHDEV	ELDERLY PEOPLE FORUM, KESHAV PURAM
179	SH. BRIJ MOHAN DUTT	FEDERATION OF WAZIRPUR, VIDHAN SABHA
180	DR. JAI KISHAN	ELDERLY PEOPLE FORUM, KESHAV PURAM
181	SH. AMIT BHATI	ROHINI
182	SH. SUNIL YADAV	ROHINI
183	SH. KRISHAN	ROHINI
184	SH. RAM KHILADI	ROHINI
185	SH. MADAN LAL	MLA, KASTURBA NAGAR

S. No.	Name	Address
186	SH. ANKIT BAISOYA	KOTLA MUBARAK PUR
187	SH. SANDEEP BAISOYA	KASTURBA NAGAR
188	SH. SANJEEV BAISOYA	KOTLA
189	SH. MB. TABREZ ALAM	RWA, LODHI ROAD
190	SH. MB SHAMSHER ALAM	RWA, LODHI ROAD
191	SH. NANDU THAKUR	LODHI COLONY
192	SH. BANDHU YADAV	LODHI COLONY
193	SH. ANYUL HAQ	LODHI ROAD
194	SH. YASH PAL RAWAT	D- BLOCK, BRAMPURI
195	SH. SAGAR	RWA, LODHI ROAD
196	SH. SUBHASH CHAUDHARI	LAJPAT NAGAR
197	SH. PRADEEP	KOTLA
198	SH. B.L. SHARMA	GARHI
199	SH. RAJESH	LAJPAT NAGAR
200	SH. SURAJ KUMAR	
201	SH. PRINCE	LAJPAT NAGAR
202	SH. ANIL SHARMA	EX. MLA, R K PURAM
203	SH. AMAN KUMAR TOMAR	R K PURAM
204	SH. ARUN KUMAR	
205	SH. PRINCE	MAHARANI BAGH
206	SH. SHREY	JANGPURA
207	SH. KAILASH NATH	LODHI ROAD
208	SH. ARVIND KUMAR	LODHI ROAD
209	SH. VINOD KUMAR	LODHI ROAD
210	SH. RAJ KUMAR	LODHI ROAD
211	MS. KANCHAN GANDHI	BJP
212	SH. MAZHAN YAZEEN	DELHI MINORITIES COMMISSION
213	SH. AJAY SINGH	R. K. PURAM
214	SH. DEEPAK KUMAR KOHLI	
215	SH. RAMAN	
216	SH. MANISH KUMAR	R. K. PURAM
217	SH. DEVENDER KUMAR	
218	MS. SEEMA MALIK	NIGAM PARSHAD, KASTURBA NAGAR
219	SH. GURPAL SINGH	MAHINDER ENCLAVE
220	SH. MANMOHAN	SECTOR-7, ROHINI
201	SH. JAGDISH YADAV	SECTOR-7, ROHINI
222	SH. OM PARKASH MAMGAIN	
223	SH. RAJESH KUMAR GUPTA	
224	SH. RAKESH SHARMA	
225	SH. ASHWANI KUMAR	
226	SH. M. YAMIN KHAN	
227	SH. ASHUTOSH KUMAR	
228	MS. POONAM CHHETRAI	
229	SH. B. A. RANGANADHAN	ADVOCATE, SUPREME COURT
230	SH. TILAK BASU	ADVOCATE
231	SH. ISHAN ROY CHAUDHARY	ADVOCATE
232	SH. RAJESH BHATIA	
233	SH. ARUN KUMAR	

S. No.	Name	Address
234	MS. PUSHPA UNIYAL	MAHILA MORCHA
235	MS. CHARANJIT KAUR	MAHILA MORCHA
236	SH. C.A. ASKHOK KUMAR	PANT MARG
237	SH. PRASHANT SHARMA	SECTOR-7, ROHINI
238	SH. KAMAL KISHOR YADAV	ROHINI
239	SH. SAMIR RANJAN	MAYUR VIHAR, PHASE-1
240	SH. TUSHAR MALHOTRA	
241	SH. KULJIT SINGH,	
242	SH. S. K. SHARMA	SECTOR-12, ROHINI
243	SH. HARISH KUMAR	
244	SH. AZHAR ALI	LAXMI NAGAR
245	SH. AMIT BHARGAWA	SRI AUROBINDO MARG
246	MS. SANGEETA TYAGI	BRAHAM PURI
247	SH. SANJAY SINGH TYAGI	BRAHAM PURI
248	SH. ASHISH VERMA	
249	SH. ARYAMAN JAIN	CHANAKYA PURI
250	SH. MUKESH KIRAR	JUNG PURA
251	SH. KANHIYA LAL	
252	SH. MUKESH KUMAR MANJHI	
253	SH. DANISH ANSARI	
254	SH. ANAND SINGH	R K PURAM
255	SH. PRADEEP RAI	R K PURAM
256	SH. SUNEEL	
257	SH. ANSAR	R K PURAM
258	SH. VISHAL KUMAR RAI	LODHI COLONY