

BEFORE THE HON'BLE DELHI ELECTRICITY REGULATORY COMMISSION

Petition No. : of 2020

IN THE MATTER OF Filing of Petition under section 62 (2) of the Electricity Act, 2003 for determination of tariff for FY 2020-21 of PPCL Station.

AND

IN THE MATTER OF Pragati Power Corporation Limited

Regd. Office "Himadri", Rajghat Power House Complex,

New Delhi - 110002

PETITIONER

THE APPLICANT ABOVE NAMED RESPECTFULLY SUBMITS

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Chapter 1 : Background

This Chapter deals with the background of this Petition.

1.1 Introduction

1. “Pragati Power Corporation Ltd.” (PPCL) is a Generating Company engaged in the business of Power generation as per Companies Act, 1956 and is wholly owned by the Government of National Capital Territory of Delhi, which operates the Pragati Power Station-I with a total capacity of 330 MW and Pragati Power Station-III with a total capacity of 1371.2 MW CCGT plant at Bawana in Delhi. The tariff determination of PPS-III Bawana is determined by Hon’ble Central Electricity regulatory commission (CERC).
2. PPS-I was commissioned in the year 2002-03 in combined cycle to meet the peak load demand of Delhi and complete its useful life by FY 2028. It consists of two gas turbines of 104 MW each, using NG/RLNG as fuel and one STG (Steam Turbines of 122 MW).
3. The Electricity Act, 2003 was notified on 10th June, 2003 repealing the Indian Electricity Act-1910, the Electricity (Supply) Act, 1948 and the E.R.C. Act, 1998. Among the tariff related provisions, the State Electricity Regulatory Commission (SERC) has to be guided by National Electricity Policy, National Tariff Policy and Central Electricity Regulatory Commission (CERC). As per Section 86 (1)(a) of the Electricity Act, the State Commission shall discharge the function of determining the tariff for generation, supply, transmission and wheeling of electricity, wholesale, bulk or retail as the case may be within the state. The generation, transmission and distribution tariff have to be determined separately.
4. As per section 61 of the Electricity Act, 2003 the appropriate Commission shall, subject to the provisions of this Act, specify the terms and conditions for the determination of tariff and as per section 62 of the Electricity Act, 2003 the appropriate Commission shall determine the tariff in accordance with the provisions of this act for supply of electricity by a generating

- company to a distribution licensee and the appropriate Commission may require a generating company to furnish separate details as may be specified in respect of generation for determination of tariff.
5. Delhi Electricity Regulatory Commission (hereinafter referred to as 'DERC' or the 'Commission') was constituted by the GNCTD on 03.03.1999 and it became operational from 10.12.1999. Accordingly, the State Commission (hereinafter referred as 'DERC') determines the tariff of Pragati Power Station-I which supply power within the Delhi state only.
 6. The petitioner is filing the present petition in line with DERC (terms and conditions of tariff regulation), 2017 & DERC Business Plan Regulation, 2019 for determination of ARR for FY 20-21.
 7. Earlier State Commission vide its letter dated 21.11.2019 has directed to file true up petition for FY 18-19, while ARR for FY 20-21 is being filed after finalization of Business Plan Regulation, 2019. However as per regulation 13 of DERC terms and conditions of tariff regulation, 2017 petition is to be filed for true up of FY 2018-19 along with determination of tariff for FY 2020-21.
 8. Further, Hon'ble Commission vide its letter dated 30.12.2019 has directed to file tariff petition/ARR for FY 20-21. Accordingly, Petitioner is filing present tariff petition for determination of ARR for FY 20-21 in compliance of Regulation 13 of DERC (terms and condition of Tariff Regulation), 2017 as additional submission of already forwarded true-up petition for FY 2018-19 vide PPCL letter dated 26.12.2019.
 9. PPS-I is filing present petition in line with the provisions of above regulations for determination of ARR for FY 20-21 and requesting Hon'ble Commission to invoke its power of relaxation wherever required in the petition.

Chapter 2 : Submissions

This Chapter lays down the modality of making submissions to the Hon'ble Commission in support of the Prayers made out as under.

2.1 Brief of Submissions

10.PPS-I proposes to make submissions to the Hon'ble Commission in support of this Petition as under:

- * Operational Parameters for Pragati Power Station-I
- * Financial Parameters for Pragati Power Station-I
- * Capital Expenditure for Pragati Power Station-I
- * Prayer

11.It is submitted that Operation and Maintenance expenses on Gas Turbine repair is cyclic in nature as type of maintenance required in Gas Turbines depends upon no. of running hours of the machine. The gas turbine components are subject to high temperature and high velocity of flue gases which needs periodic inspection at regular interval and replacement of worn out parts on the completion of recommended life, beyond which the machine operates at high risk level. Hence, the expenditure on account of DLN burner/AGPI (Advanced Gas Path Inspection) of the machine for FY 20-21 is to be allowed additionally on actual basis.

12. Further, in addition to above, Sewage Water Charges (STP) due to use of sewage water has been allowed additionally over and above the normative O&M. The state Commission has been continuously allowing the above expenditure on actual basis. It is therefore requested to allow above expenditure as additional to normative O&M for FY 20-21 on actual basis.

13.Hon'ble commission is also requested to consider the impact on performance of thermal generating stations operated in part load operation as recommended by Central Electricity Authority vide letter no. CEA/TETD-TT/2018/N-15/1451 dated 10.12.2018. The copy of the letter is attached herewith and marked as **Annexure 'A'**. The impact of part load operation on

performance of thermal generating stations as per point no. F of the letter is reproduced as under:-

“F. Impact of part load operation on performance of thermal generating stations:

.....

2. Gas/Liquid fuel based Thermal generating Stations:

i) Impact on Station Heat Rate:

The degradation of module/plant heat rate for gas /liquid fuel based thermal generating stations in CCGT mode of operation are proposed to be considered as below:

Sl.No.	Module/Plant loading as % of Installed capacity	Increase in module/plant heat rate (%)
1.	90 to 100	Nil
2.	80 to 89.99	2.5
3.	70 to 79.99	5
4.	60 to 69.99	8
5.	50 to 59.99	12

ii) Impact on Auxiliary Energy Consumption:

The additional auxiliary energy consumption admissible at part loading of gas/liquid fuel based thermal generating station is proposed to be considered as below:

Sl.No.	Plant/ Module loading as % of Installed capacity	Admissible % additional auxiliary energy consumption (% point)
1.	90 to 100	Nil
2.	80 to 89.99	2.5
3.	70 to 79.99	5
4.	60 to 69.99	8
5.	50 to 59.99	12

Determination of tariff of PPS-I for FY 20-21

Since the PLF of PPS-I for the last 3 years had been quite low due to less scheduling of the plant by SLDC and DISCOMs. In view of the low scheduling the loading of the plant remains very low as compared to the installed capacity. The Hon'ble Commission is therefore requested to kindly consider the recommendations of CEA and provide suitable compensation to the petitioner in heat rate and Auxiliary power consumption.

14. The State Commission tried up the tariff for FY 17-18 vide tariff order dated 31.07.2019. However, aggrieved by certain decisions of the State commission contrary to DERC tariff regulation, 2017 and Business plan Regulation, 2017 in impugned order, Petitioner has filed an APPEAL no. 393 of 2019 before Appellate Tribunal for Electricity. There are similar issues for FY 18-19, therefore, Petitioner is filing present true up petition without prejudice to its submission in existing case on above matter.

Chapter 3 : Norms for Operation

Petitioner has taken into consideration the parameters as allowed in DERC, Business Plan Regulation, 2019 for determination of ARR for FY 20-21.

3.1 Operational Parameters

15. The operational parameters considered by the petitioner for FY 20-21 is taken as per DERC Business Plan Regulation, 2019 and shown as under:-

Table 3-1: Operational Parameters

Description	UoM	FY 20-21
Station Heat Rate (CC)	kCal/kWh	2000
Station Heat Rate (OC)	kCal/kWh	2900
Auxiliary Consumption (CC)	(%)	2.75
Auxiliary Consumption (OC)	(%)	1.00
Availability (NAPAF)	(%)	85
PLF (NAPLF)	(%)	85

3.2 Gross Generation and Net Generation

16. On the basis of operational parameters considered for FY 20-21, Gross and Net Generation of the Station is calculated as under:-

Table 3-2: Gross and Net Generation

Sr.No.	Description	UoM	FY 20-21	Remarks
A	Plant Capacity	MW	330	
B	PLF	%	85	Table 3-1
C	Gross Generation	MU	2457.18	$=A*B*365*24/100000$
D	Aux. Cons.	%	2.75	Table 3-1
E	Aux. Cons.	MU	67.57	$E = C * D$
F	Net Gen.	MU	2389.61	$F = C - E$

Chapter 4 : Energy Charge Rate and Fuel Cost

This Chapter deals with the estimation of fuel required to operate PPS-I plant at normative parameters throughout the year along with the fuel cost arrived for the year FY 20-21.

4.1 Fuel Consumption

17. Pragati Power Station-I has a long-term existing agreement with Gas Authority of India Limited (GAIL) for supply of Gas. Earlier, 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 0.19 MMSCMD to 0.25 MMSCMD of APM gas and 0.28 MMSCMD of PMT gas (0.02 MMSCMD). 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. MoP&NG has allocated 0.02 MMSCMD non-APM ONGC gas whose supply has been commenced from mid October, 2011. Thus, PPS-I has sufficient gas to run both the GT's on base load.

18. The estimated fuel cost and its consumption for FY 20-21 has been calculated based on the weighted average GCV of three months from October 2019 to December 2019 in line with DERC regulation, 2017. The weighted average landed price of the gas comes to Rs 24.826 per SCM and weighted average GCV is 9226.299 kCal/SCM.

19. 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:

(b) For gas and liquid fuel based stations

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

Determination of tariff of PPS-I for FY 20-21

20. However, to run the plant at normative PLF, the total gas required would be 532.647 MMSCM as calculated in the following table:

Table 4-1: Total Gas Consumption Required

S.No.	Particulars	Unit	FY 20-21	Remarks
A	Station Heat Rate	kCal/kWh	2000	Table 3-1
B	Weighted Average GCV	kCal/ SCM	9226.299	Para 18
C	Gross Generation	MU	2457.18	Table 3-2
D	Total Gas Cons.	MMSCM	532.647	$D = A * C/B$

21. Further, in order to calculate the requirement of 532.647 MMSCM of gas in FY 20-21, petitioner has taken the total actual gas allocation of APM, NAPM and R-LNG gas for PPS-I plant starting from Jan-19 to Dec-19 and the balance quantity will be met from spot-RLNG.

22. Accordingly, Petitioner has taken the weighted average landed price of fuel of different gases for the month of October, November and December, 2019 while calculating the fuel cost for FY 20-21. The estimated fuel cost is calculated in the table below:-

Table 4-2: Estimated Fuel Cost and ECR

S. No.	Particulars	Unit	Gas Consumption				FY 20-21	Remarks
			APM	NAPM	RLNG	SPOT RLNG		
A	Gas available	MMSCM	92.54	6.642	73.00	360.468	532.647	Table 4-1
B	LPPF	Rs/SCM	11.892	12.178	31.314	29.868		Para 22
C	Fuel Cost	Rs in Cr	110.05	8.09	228.59	1076.65	1423.38	$C = A * B$
D	Net Generation	MU					2389.61	Table 3-2
E	ECR	Rs/kWh					5.957	$E = C/D*10$

23. In view of above, petitioner request Hon'ble Commission to consider the fuel cost of Rs 1423.38 Cr for FY 20-21 as shown in above table.

Chapter 5 : Estimation of Fixed Cost

5.1 Parameters for Fixed Cost

24. As per DERC (Terms and conditions for determination of tariff) Regulation 2017 and Business Plan regulation 2019 the annual fixed cost (AFC) of a Generating Entity shall consist of the following components as specified in these Regulations:

- (a) Operation and Maintenance expenses;
- (b) Depreciation; and
- (c) Return on Capital Employed;

5.2 Operation and Maintenance Expenses

25. Hon'ble Commission has specified Normative Operation and Maintenance expenses in DERC Business Plan Regulation, 2019 for the control period from FY 20-21 to FY 22-23 shown as under:

Table 5-1: O&M Expenses (Rs. Lakh/ MW)

Station	2020-21	2021-22	2022-23
PPS-I	23.02	23.90	24.82

26. Petitioner may like to further submit that pay and perks of employees of the petitioner Company is determined in line with Central Pay Commission Recommendations. In case of Petitioner Company the same has been partially implemented on recommendation of wage revision committee. Accordingly, Petitioner has paid Interim relief to the employees of IPGCL for the years starting from FY 17-18 to till date. Further, the final payment along with the arrears will be paid to the employees after the order of implementation of wage revision committee report and is likely to be implemented in FY 20-21.

27. Accordingly, State Commission is requested to allow the impact on account of implementation of seventh pay commission additionally in FY 20-21 on actual basis to the petitioner.

Determination of tariff of PPS-I for FY 20-21

28. Further, PPCL has installed DLN burner at PPS-I to control the Nox level. The repair and maintenance expenditure on account of DLN/AGPI of the machine is cyclic in nature; has been varied on year to year basis based on the running hours of the machine for smooth operations of the plant.

29. Pragati Power Station-I is sourcing plant water requirement from the treated effluent water from sewage treatment plants and has to incur more cost to get raw water, as compared to other similar stations. The actual expenditure on this account includes expenditure on operation, electricity, Chemicals etc.

30. However, State Commission in Business Plan regulation, 2019 allowed the recovery of amount incurred on account of DLN and STP as additional R&M and states as under:-

"6. OPERATION AND MAINTENANCE EXPENSES

.....

(2) Additional Repair & Maintenance expenses on account of Dry Low NOx (DLN) burners and Sewage Treatment Plant (STP), if any, shall be allowed on actual basis during the Control Period after prudence check at the time of True Up on submission of documentary evidence."

31. In view of above, the O & M expenses for FY 20-21 are calculated as under:

Table 5-2: O & M Expenses

S.No.	Particulars	UoM	FY 20-21	Remarks
A	Base O&M expenses	Rs Cr.	75.97	Para 25
B	DLN Burner for the period	Rs Cr.	-	Para 30
C	STP	Rs Cr.	-	Para 30
D	Impact of 7 th Pay Commission	Rs Cr.	-	Impact of 7 th Pay commission to be allowed additionally on actual basis.
E	Total O&M Expenses	Rs Cr.	75.97	E = A+B+C+D

5.3 Capital Expenditure

32. Hon'ble Commission has approved the closing Gross Fixed Asset of Rs. 1050.38 Cr in FY 2019-20 in its tariff order dated 31.07.2019. Further, PPCL has submitted its business plan for the period FY 20-21 to FY 24-25 vide its letter dated 30.09.2019 to State Commission and Hon'ble Commission vide its order dated 27.12.2019 has approved the Business Plan regulation, 2019 for the control period FY 20-21 to FY 22-23 and allowed the capital expenditure as under:-

"7. CAPITAL INVESTMENT PLAN

(1) The tentative Capital Investment plan for the Generation Entity for FY 2020-21 to FY 2022- 23 is as follows:

Table 2: Capital Investment plan (in Rs. Cr.)

Sr. No.	Description	2020-21	2021-22	2022-23
1.	Gas Turbine Power Station (GTPS)	17.33	16.10	-
2.	Pragati Power Station (PPS-I)	2.82	51.81	-

33. Accordingly, the GFA of PPS-I for FY 2020-21 is calculated as under:-

Table 5-3: Capital Expenditure

S.No.	Particulars	Unit	FY 20-21	Remarks
A	Opening GFA	Rs in Cr.	1050.38	Para 32
B	Addition	Rs in Cr.	2.82	Para 32
C	Deletion	Rs in Cr.	0.00	
D	Closing GFA	Rs in Cr.	1053.20	D = A+B-C
E	Average GFA	Rs in Cr.	1051.79	E = (A+D)/2

5.4 Depreciation

34. Since cumulative depreciation has reached 70% of the total depreciation, the petitioner has spread the remaining depreciable value over the remaining life of the asset, in accordance with the DERC Tariff Regulation, 2017. The total accumulated depreciation allowed by the Hon'ble Commission till FY 2019-20 is Rs 836.28 Cr. Accordingly, depreciation calculated for FY 2020-21 is calculated as under:-

Table 5-4: Details of Depreciation

S.No.	Particulars	Unit	FY 20-21	Remarks
A	Average GFA	Rs in Cr.	1051.79	Table 5-3
B	Opening Accumulated Depreciation	Rs in Cr.	836.28	Para 34
C	Balance Depreciation	Rs in Cr.	110.33	$C = 90\% \text{ of } A - B$
D	Balance useful life	Years	8	
E	Current Year Depreciation	Rs in Cr.	13.79	$E = C/D$
F	Closing Accumulated Depreciation	Rs in Cr.	850.07	$F = B + E$
G	Average Accumulated Depreciation	Rs in Cr.	843.18	$G = (B + F)/2$
H	Average Net Fixed Asset	Rs in Cr.	208.61	$H = A - G$

5.5 Working Capital

35. Petitioner has calculated the Interest on Working Capital as per DERC 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 NAPAF duly taking into account mode of operation of the generating station on gas fuel and liquid fuel;*
- b. Liquid fuel stock for 15 days*
- 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.”*

36. In view of above, the working capital required for FY 20-21 is calculated as under:

Table 5-5: Requirement of Working Capital

S.No.	Particulars	Unit	FY 20-21	Remarks
A	Fuel expenses for 1 month	Rs Cr	118.62	Ref. Table 4-2
B	Liquid Fuel for 1/2 month	Rs Cr	0.00	
C	Maintenance spares @ 30% of O&M	Rs Cr	22.79	Ref. Table 5-2
D	O&M expenses for 1 month	Rs Cr	6.33	Ref. Table 5-2
E	Annual Fixed Cost for the year	Rs Cr	165.01	Table 5-8
F	Fuel Cost for the year	Rs Cr	1423.38	Table 4-2
G	Receivables equivalent to 2 months of capacity and energy charge	Rs Cr	264.73	$G = (E+F)/6$
H	Total Working Capital	Rs Cr	412.47	$H = A+B+C+D+G$

37. In view of above, Petitioner request Hon'ble Commission to consider the working capital for FY 20-21 as shown in table above.

5.6 Requirement of Loan and Equity

38. Since accumulated depreciation has reached over and above 70% of Gross Fixed asset, the remaining value is treated as 100% equity. Accordingly, petitioner has determined the requirement of Loan and Equity as follows:-

Table 5-6: Requirement of Loan & Equity

S.No.	Particulars	Unit	FY 20-21	Remarks
A	Average Net Fixed Asset	Rs in Cr.	208.61	Table 5-4
B	Average Equity	Rs in Cr.	208.61	Para 38
C	Average CAPEX Loan	Rs in Cr.	0.00	Para 38
D	Working Capital Loan	Rs in Cr.	412.47	Table 5-5
E	Total Loan Requirement	Rs in Cr.	412.47	$E = C + D$
F	Average RRB	Rs in Cr.	621.08	$F = B + E$

39. In this regard it is to submit that as against not treating the balance GFA as equity, in absence of any outstanding loan (all Capital Loans are already paid), rather dividing it in the ratio 30:70 of equity and loan, Petitioner has filed an appeal no. 393 of 2019 in APTEL for adjudication of disputes in treating GFA in absence of any existing loan as above. Therefore Petitioner is filing present tariff petition without prejudice to its submission in existing case on above matter.

5.7 Return on Capital Employed

40. 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.

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

$$\mathbf{RoCE = WACC_i * RRB_i}$$

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.

42. 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;

43. Further, Commission has specified Margin for Rate of Interest on loan in Business Plan Regulations, 2019 as follows:

“5. MARGIN FOR RATE OF INTEREST ON LOAN

The rate of interest on loan for a financial year shall be Marginal Cost of Fund based Lending Rate (MCLR) of SBI as on 1st April of that financial year plus the Margin. The Margin, in terms of Regulation 4(2) of the DERC (Terms and Conditions for Determination of Tariff) Regulations, 2017 for the Generating Entity, is allowed as the difference between the weighted average rate of interest on actual loan portfolio and the MCLR as on 1st April of that financial year:

Provided that the Margin shall not exceed 5.00%, 4.25% and 3.50% for the first, second and third year of the control period, respectively”

Determination of tariff of PPS-I for FY 20-21

44. The petitioner has no outstanding capital loan as on date, therefore in order to calculate the return on capital employed petitioner has taken weighted average interest rate on outstanding working capital loan, which is 9.15%. This rate of interest is within prescribed limit of this regulation i.e inclusive of SBI MCLR of 7.90% as on 10.12.2019 notified by State Bank of India plus margin of 1.25% taken as the difference of the weighted average rate of interest on working capital loan portfolio and SBI MCLR as on 10.12.2019 for FY 20-21.
45. 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 22.15%. Accordingly grossed up rate of return on equity has been computed at 17.98% for FY 2020-21.
46. Accordingly, Petitioner has computed Weighted Average Cost of Capital (WACC) and Return on Capital Employed (RoCE) as follows:

Table 5-7: WACC and RoCE

S.No.	Particulars	Unit	FY 20-21	Remarks
A	Average RRB	Rs in Cr.	621.08	Table 5-6
B	Total Loan	Rs in Cr.	412.47	Table 5-6
C	Average Equity	Rs in Cr.	208.61	Table 5-6
D	Cost of Debt, Rd	%	9.15	Para 44
E	Return on Equity, Re	%	17.98	Para 45
F	WACC	%	12.12	Para 42
G	RoCE	Rs in Cr.	75.26	$G = A * F$

5.8 Summary of Fixed Cost

47. The DERC tariff regulation 2017 has following provisions regarding fixed cost which reads as under:-

“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.”

Accordingly, the Annual Fixed Cost for FY 20-21 is calculated as under:-

Table 5-8: Annual Fixed Cost

S.No.	Particulars	Unit	FY 20-21	Remarks
A	Return on Capital Employed	Rs Cr	75.26	Table 5-7
B	Depreciation	Rs Cr	13.79	Table 5-4
C	Operation and Maintenance Expenses	Rs Cr	75.97	Table 5-2
D	Annual Fixed Cost	Rs Cr	165.01	D = A+B+C
E	Net Generation	MU	2389.61	Table 3-2
F	Fixed Cost Per Unit	Rs/ kWh	0.69	F = D/E*10

48. On the basis of above submissions, the Hon'ble Commission is requested to approve the ARR for FY 20-21 as per the above submission.

Chapter 6 : Prayer

6.1 Prayer

Petitioner respectfully prays to the Hon'ble Commission;

- ❖ To consider the submissions of ARR for FY 20-21 as additional submission to already filed true-up petition for FY 19-20.
- ❖ To approve the operational and financial parameters as proposed for FY 20-21.
- ❖ To consider the impact on performance of thermal generating stations operated in part load operation.
- ❖ To grant any other relief as Hon'ble Commission may consider appropriate.
- ❖ The petitioner craves leave of the Hon'ble Commission to allow further submissions, addition and alteration to this Petition as may be necessary from time to time.
- ❖ Pass any other order as Hon'ble Commission may deem fit and appropriate under the circumstances of the case and in the interest of justice.

(SURENDER MOHAN VERMA)

DIRECTOR (TECH.)

Pragati Power Corporation Limited

PETITIONER