PUNJAB STATE ELECTRICITY REGULATORY COMMISSION

SITE NO. 3, BLOCK B, SECTOR 18-A MADHYA MARG, CHANDIGARH

Review Petition No. 02 of 2024
In Petition No. 64 of 2023
Date of Order: 12.12.2024

Review Petition under Section 94 of the Electricity Act, 2003 against Tariff Order dated 14.06.2024 for financial year 2024-25.

In the matter of: Punjab State Power Corporation Limited, The Mall, Patiala, Punjab.

... Review Petitioner

Commission: Sh. Viswajeet Khanna, Chairperson
Sh. Paramjeet Singh, Member

ORDER

Punjab State Power Corporation Limited (PSPCL) has filed the present Review Petition seeking review of the Tariff Order dated 14.06.2024 passed by the Commission in Petition No. 64 of 2023. The Review petition was admitted vide Order dated 29.08.2024. PSPCL was directed to issue Public notice as required under Section 67 of the Punjab State Electricity Regulatory Commission (Conduct of Business) Regulations, 2005 inviting objections/suggestions from the Public/Stake holders. The Public notice was published on 07.09.2024 in The Tribune (English), Hindustan Times (English), Jag Bani (Punjabi), Punjab Kesri (Hindi) and Dainik Savera (Hindi). The petition was taken up for hearing as well as public hearing on 18.09.2024. However, nobody appeared from the public in the public hearing. PSPCL filed additional submissions/replies to the queries raised by the Commission in its interim Order dated 20.09.2024, vide memo No. 4559 dated

06.09.2024 and memo No. 4660 dated 08.11.2024. After hearing the Ld. Counsel for the Petitioner, Order was reserved vide Order dated 21.11.2024.

Observations and Decision of the Commission

The Commission has examined the Review Petition**,** the submissions made by PSPCL during hearing and decides as under:

1. True-up for FY 2022-23

A. AP CONSUMPTION

PSPCL's submissions:

Issue A1

i. The Commission has disallowed 52.75 MUs on account of AP urban feeder consumption due to non-furnishing of details of meters that are defective/lost/burnt, etc. The Commission has considered the monthly average consumption per consumer based on functional meter readings to calculate consumption for the remaining 36820 readings of defective/lost/burnt meters, which is an error apparent on the face of the record. The methodology adopted by this Commission is not in accordance with any regulation framed under PSERC MYT Tariff Regulations, 2019. Using an average methodology for estimating the electricity consumption of all AP urban connections is inappropriate. This approach may produce erroneous results due to varying water table levels in different districts and the differing loads of each AP motor.

ii. There are approximately 1,286 Nos. of AP urban feeder connections where various kisan unions and consumers do not allow PSPCL to install meters. In accordance with prevailing guidelines, since electricity is being consumed by these connections, average consumption is recorded for these connections, as well as for meters that are defective or where readings are unavailable for any reason.

Issue A2

iii. At the time of filing of the Petition, the total AP consumption was 13,762.56 MUs, out of which total pumped energy was 15,147.72 MUs (considering AP consumption of Kandi area mixed feeders as 30%). This included an adjustment of 132.67 MUs on account of adjustment for Kandi feeder segregation work carried out under DDUGJY Kandi Schemes.

iv. According to the data provided by the DS office, load segregation works have been completed on 42 feeders. However, due to resistance from certain villages or deras, some load was not shifted. During the meetings dated 21/11/22 and 22/11/22 it was decided that:

a) For minor works, the operation divisions will prepare estimates and complete the necessary tasks. The operation divisions must ensure that feeders with correct categories are created online by their subdivision offices and are linked by the concerned Grid Maintenance Divisions in the online returns.

b) The office of CE South and CE North is required to submit revised bills for AP energy for the Kandi feeders by no later than 25.11.2022.

v. The data regarding the date of segregation load and AP/Non-AP load on the remaining Kandi mixed load feeders was received from the North Zone on 25.11.2022 and from the

South Zone on 26.11.2022. Relevant extract of the percentage of Non-AP load on these feeders is as under:

Table 1: Non-AP Load (%) on Kandi Mixed Feeders.

Non-AP Load	No of Feeders
Zero	13
Less than 5%	9
5% to 30%	10
30% to 50%	12
More than 50%	30
TOTAL	**74**

vi. Accordingly, the AP energy for Kandi Mixed load feeders has been revised based on the percentage of AP load *vis-a-viz* non-AP load from the month of segregation of load and handover by APDRP to DS.

vii. The analysis of feeder energy booking to AP by load is as under:

Table 2: Energy booked to AP on Kandi Mixed Feeders (in kWh)

	No of Feeders	AP Energy already claimed for 2021-22	Balance AP Energy to be claimed for 2021-22	AP Energy already claimed for 2022-23	Balance AP Energy to be claimed for 2022-23
Feeders with AP Load Less than 30%	10	90,75,318	-36,96,320	1,13,01,102	-42,86,546
Feeders with AP Load More than 30%	64	4,70,04,742	6,27,56,130	6,18,63,082	7,78,44,521
TOTAL	74	5,60,80,060	5,90,59,810	7,31,64,184	7,35,57,975

viii. From the above table, it is evident that there are 10 feeders with an AP load of less than 30%, whereas the AP energy share has been booked at 30%. Therefore, the AP energy for these feeders is to be reduced by -3.6 MU for FY 21-22 and -4.2 MU for FY 22-23.

ix. AP consumption for FY 2021-22 and 2022-23 needs to be approved, after incorporating AP losses @ 85% of target loss, as under:

Table 3: AP Consumption Adjustment for FY 2021-22 & FY 2022-23

FY	Balance AP Energy to be claimed (MU)	AP Loss	Kandi Pure AP Adjustment DDUGJY Kandi Works (MU)
2021-22	59.06	AP Loss @9.55% for Apr & May-21 and AP Loss @10.49% for Jun-21 onwards	52.92
2022-23	73.6	10.23%	66.08
TOTAL	132.67		119.00

x. PSPCL has requested that the data previously submitted in the AP bill be duly considered by the Commission.

Issue A3

xi. The mixed feeders validated by the Commission at 66kV Indira Nagar, Nangal exhibit less AP load. If a similar approach is applied to other mixed load feeders based on AP load share, it reveals that there are additional feeders where the AP load exceeds 30%. Therefore, it is respectfully submitted that a 30% AP energy share should be granted for mixed load feeders, in accordance with the methodology adopted by the Commission. Any disallowance of this share is inconsistent with the Commission's established approach.

xii. The consumption of the Kandi Mixed Chando feeder, as per office records, is 961,800 kWh. In addition to the energy verified by the Commission, it is requested that the AP consumption of 3.2 LUs for December 2022 and 0.28 LUs for January 2023 be included in the total AP consumption.

xiii. In the facts and circumstances mentioned above, it is respectfully submitted that the Commission may review the AP consumption disallowance.

Commission's Analysis:

Issue A1

xiv. The AP consumption approved by the Commission for FY 2022-23 is explained in detail in para 3.2.2 (v) of the Tariff Order of FY 2024-25. Further, PSPCL has been repeatedly directed to implement the directions of the Commission and the same were reiterated in Tariff Order for FY 2024-25 vide Directive No. 6.4(iii) (100% metering on AP consumers fed from urban feeders) and Directive No.6.2 (i) (100% metering) to furnish correct monthly readings.

Regulation 12.2 of the PSERC MYT Regulations, 2019 provides as under:

"Truing up of uncontrollable items shall be carried out at the end of each year of the Control Period based on prudence check."

Further, the water table in Punjab in almost all districts has depleted substantially and, as such in the absence of functional meters, average AP consumption has been reasonably and logically allowed where meters are defective/lost/burnt. As such, in the absence of true monthly readings of 36,820 meters being defective/lost/burnt (which is a very high number and needs attention of PSPCL), to be fair, the Commission allowed consumption per consumer on defective meters at par with the consumption of correct meters so calculated for 64,298 healthy meters. PSPCL has failed to implement the Commission's directive which is pending since FY 2013-14. The Consumers of Punjab cannot be made to pay for the inefficiency of PSPCL. The scale of defective meters which is over 36% of the total meters is unacceptable and a continuing lapse on the part of PSPCL. It cannot hope to benefit from its own failure.

xv. The Commission, while reiterating its directions in Directive 5.5(c) of the Tariff Order for FY 2018-19, has stated that after due validation, consumption of only metered AP consumers fed from urban feeders shall be considered while computing AP consumption. The said directions were also reiterated in the Tariff Orders for FY 2020-21 to FY 2024-25. PSPCL should have taken requisite steps viz-a-viz proper cognizance to arrange reading of meters and should have provided monthly readings of all the urban AP meter connections to assess correct AP consumption. PSPCL needs to take proper and earnest steps to ensure 100% AP urban connections metering and excuses being taken for not doing so as preferred by PSPCL are facile and irresponsible and thus not valid or acceptable.

Issue A2

xvi. PSPCL during a meeting held on 05.02.2024, revealed that 132.67 MkWh have been booked as an adjustment to the Kandi feeders as per the report of its APDRP wing by correcting the month of segregation of load. From the perusal of the data, it was gathered that the adjustments have been made by PSPCL in FY 2021-22 and FY 2022-23. PSPCL was further asked to correct the AP data of Kandi area mixed feeders, for FY 2022-23 in the AP ledger itself. PSPCL resubmitted the AP ledger data vide email dated 22.02.2024. From the revised AP ledger data supplied by PSPCL for FY 2022-23, the AP consumption from Kandi Mixed feeders, as submitted by PSPCL, comes out to be 559.02 MkWh and that of Kandi Pure AP feeders, the AP consumption comes out to be 151.87 MkWh which the Commission has allowed. Thus, for FY 2022-23, the Commission has allowed AP consumption of Kandi area Mixed feeders as claimed by PSPCL.

The Commission has already trued up the AP consumption for FY 2021-22 in the Tariff Order for FY 2023-24 and PSPCL had not claimed any adjustment of AP energy even in the Review Petition No. 04 of 2023 filed by PSPCL for the review of the Tariff Order for FY 2023-24. Thus, the consumption data for the trued up years has already attained finality and cannot be reopened for which PSPCL is solely responsible.

Issue A3

xvii. The Commission got the pumped energy of some of the Kandi Mixed AP feeders checked/validated from the Committee constituted by the Commission. During validation, the Committee observed that the data in respect of Bhanupli, Bhabhour Sahib, Bhallan, Giani Market, Indira Nagar, Jawahar Market and Gohlani Kandi Mixed AP feeders at 66 kV Grid sub-station Indira Nagar, Nangal shows that AP load on these feeders was miniscule i.e. in the range of 0.09% to 2.73% compared to the 30% considered by the Commission for working out the AP energy of Kandi Mixed Feeders. From the validated data which has the signature of PSPCL AEE/DS, Nangal, it is quite clear that the above feeders had almost negligible AP consumption and knowingly 0.09% consumption cannot be averaged out to be made equivalent to that of 30%

consumption. For assessment of AP consumption fed from other Kandi area Mixed feeders, the pumped energy for the agriculture load was considered as 30% of the total pumped energy as submitted by PSPCL. Further it is emphasized that the same has been done in line with Regulation 12.2 of PSERC MYT Regulations which allows the Commission to perform a prudence check of uncontrolled items. As such, the Commission has correctly disallowed extra AP consumption booked on these feeders.

xviii. In the case of Kandi Mixed Chando feeder from 220kV Grid substation Kharar, as per the ledger data the consumption for FY 2022-23 was 9,61,800kWh. However, the data as received from PSPCL during validation depicts that the total energy consumption for FY 2022-23 is 6,26,362 kWh which includes 3.2 LUs for December 2022 and 2.24 LUs for January 2023 in the AP consumption of this feeder. Thus, the Commission has already allowed 3.2 LUs for December 2022 and 2.24 LUs for January 2023 (in place of 0.28 LU mentioned in the Review Petition).

The Commission observes that the issues raised above regarding disallowance of AP Consumption for FY 2022- 23 were duly considered in the Tariff order for FY 2024-25. As such, the prayer with regard to review of the earlier Order on the issue of AP consumption is disallowed. The original order is reaffirmed.

B. ENERGY REQUIREMENT (MU)

PSPCL's submissions:

i. In the truing up process, the Commission has considered the total energy requirement of PSPCL as 68,786 MUs, as against the actual requirement of 69,440 MUs. Power purchase requirement and costs are uncontrollable factors and have actually been incurred by PSPCL and ought not to be reduced. The energy requirement is to meet the demand of the consumers in the State of Punjab and ought not to be reduced.

ii. The Commission has computed the energy requirement based on the target distribution loss calculation. The difference is on account of disallowance of 151 MUs for AP consumption as above, and 506 MUs on account of target distribution losses (12.04% against the actual submitted loss of 12.67%).

iii. The Commission has determined the energy requirement of PSPCL at targeted distribution level of 12.04% against the actual submitted loss of 12.67%. Significant and coordinated efforts have been made in previous years to improve billing and collection efficiency and to ensure quality power supply. Intensive campaigns have been launched by PSPCL to replace electromechanical or faulty meters to improve metering accuracy. Additionally, rigorous vigilance drives have been carried out to prevent power theft and unauthorized energy use. PSPCL remains committed to meet the loss targets and actively works towards achieving them. Notably, for the 3rd Control Period, the Commission has set a distribution loss target of 12.30% for FY 2023-24, 12.10% for FY 2024-25 and 11.90% for FY 2025-26, whereas the target distribution loss for FY 2022-23 was set at 12.04%. Thus, the lower target for FY 2022-23 than for FY 2023-24. Even the distribution loss target for FY 2024-25 is not justified. PSPCL requested the Commission to review the same in line with the distribution loss trajectory approved for the 3rd Control Period and review the distribution loss target for FY 2022-23 as per actuals.

Commission's Analysis:

Issue B:

iv. The Commission in its Tariff Order for FY 2024-25, while doing the truing up of FY 2022-23, in paras 3.2 to 3.4 had worked out in detail the Sales, Transmission and Distribution (T&D) Loss and Energy Requirement for FY 2022-23. Further, the Commission in para 3.4 and para 3.7 of the Tariff Order for FY 2024-25 has already examined and elaborated upon in detail, the methodology and working of energy requirement of 68785.54MkWh approved by the Commission after due prudence check. Regarding disallowance on account of distribution losses the Commission observed that lowering the target distribution loss levels would reward PSPCL for its inefficiency of not being able to bring its losses down to the target levels and it would be unjust to pass on the impact of increased losses to the consumers who have already been burdened with the Capex of more than Rs. 4000 Crore allowed to PSPCL for the purpose of Network strengthening and Loss Reduction. It would amount to double jeopardy for the consumers of the State.

v. It is further observed that PSPCL, both in the petition as well as review petition, has been harping upon fixation of higher distribution loss trajectory for the 3rd MYT Control period from the approved loss trajectory of 12.04% for FY 2022-23. In this regard it is pointed that for the 3rd MYT Control period, the Commission has considered distribution loss as proposed by PSPCL i.e. 12.30% for FY 2023-24, 12.20% for FY 2024-25 and 12.10% for FY 2025-26 with reduction of 0.20% each year in place of 0.10% proposed by PSPCL. PSPCL has failed to notice and appreciate the fact that the Commission has set the loss trajectory for the 3rd MYT Control on the basis of PSPCL's own request alongwith allowing substantially higher amount of capital investment for the 3rd Control Period for various network strengthening, augmentation and loss reduction schemes.

Table 4: Distribution Loss Trajectory for 3rd MYT Control Period

Distribution Loss Trajectory	FY 2023-24	FY 2024-25	FY 2025-26
Distribution Loss Trajectory proposed by PSPCL	12.30%	12.20%	12.10%
Distribution Loss Trajectory Approved by the Commission	12.30%	12.10%	11.90%

vi. The Commission observes that all the issues raised above by PSPCL relating to the Energy Requirement for FY 2022- 23 were duly considered in the Tariff order for FY 2024-25. PSPCL has neither produced any new evidence (which was not within the knowledge of the PSPCL at the time when the decision/order was passed by the Commission) nor is there any mistake or error apparent on the face of the record. As such the prayer with regard to review of the earlier Order on the issue of Energy Requirement is disallowed. The original order is reaffirmed.

C. POWER PURCHASE

PSPCL's submission:

Issue C1

i. The Commission has disallowed 683.76 MUs of power purchase based on the revised energy requirement, due to under-achievement of distribution losses targets. Consequently, the corresponding cost of Rs. 385.58 Crore was disallowed at the short-term power purchase rate. The Commission continues to impose disallowances on the power purchase requirement, it has not provided any relaxation in the distribution loss trajectory based on PSPCL's actual losses. The same constitutes a mistake or error apparent on the face of the record and the tariff to this extent ought to be reviewed.

Issue C2

ii. The Commission has disallowed additional UI Charges of Rs. 15.26 Crore under CERC DSM Regulations, 2014, and its subsequent amendments. PSPCL never intends to deviate from energy schedules by overdrawing or under drawing. Deviations from scheduled and actual power consumption are inherent to the power system, as demand and availability can never be perfectly aligned. Punjab, being a heavy power-consuming state, experiences frequent load variations due to factors such as day and night cycles, crop seasons, and seasonal changes affecting domestic and industrial loads, many of which are weather-dependent. During sudden load fluctuations or variations, the frequency typically increases and the UI rate decreases, leading to lower power costs under force majeure conditions. Conversely, during normal periods when energy is drawn at standard rates, the net amount may seem irrational. Additionally, the power system includes a variety of generators such as thermal, gas, hydro, nuclear, solar, etc. which contribute to these variations. Due to sudden load crashes or variations, it requires at least one hour to adjust the load across the entire State. Similarly, if a unit trips on the availability side, it takes a minimum of one hour to manage the system, either through load shedding or by utilizing other available sources as spinning reserves at such short notice.

iii. Deviation charges are calculated on 15 minutes block, variations in demand and availability within such short intervals cannot be fully compensated or nullified. This is why the tariff regulations include a provision for deviation, which is intended to ensure that such deviations incur changes to prevent entities from exploiting the same for financial gain.

iv. Given the circumstances, the Central Commission has been actively addressing these issues since FY 2014-15 through the Ancillary Services Regulations, 2015. These regulations involve providing power to NLDCs for deploying and booking costly power to entities that deviate from schedules through SRAs, RRAs, secondary reserves, and tertiary reserves to manage frequency and deviations. These measures were officially implemented by the Central Commission on 05.12.2022.

v. The NLDCs and SLDCs were empowered to estimate, procure in advance, and deploy various ancillary services to maintain frequency control. Despite these measures, the anticipated improvement in participation through ancillary services did not materialize. On 26.12.2022, within 21 days of implementation, the Central Commission took *suo moto* notice that the RLDCs were unable to manage frequency control effectively, leading to deterioration in the frequency profile. Consequently, the Central Commission revised the DSM structure to support RLDCs. However, RLDCs continued to face challenges, prompting the Central Commission to modify the Ancillary Service Regulations on 31.01.2023, to further assist RLDCs in managing frequency deviations. Despite these adjustments, the frequency profile remained a concern, and on 06.02.2023, the Central Commission directed that the DSM provisions be reverted to their original form, with minor adjustments. The energy and cost figures related to DSM are minimal compared to the total power exchanged by PSPCL. PSPCL has stationed its staff on SLDC control room where in coordination with SLDC, continuous monitoring is conducted to minimise deviations implement corrective measures for real time control of generation and demand.

vi. This issue of allowance of additional UI charges is no longer *res integra* and has been decided in the affirmative by the Appellate Tribunal *vide* decision dated 29.04.2022 in Appeal No. 264 of 2014, Appeal No. 173 of 2015, and Appeal No. 277 of 2015.

Issue C3

vii. Rs. 17.19 Crore relating to the Late Payment Surcharge (LPS) paid to generators has also been disallowed. This disallowance is unjust to PSPCL, as the rebate amount received from early payments to generators is included in Non-Tariff Income and thus benefits the consumers, while PSPCL alone bears the burden of LPS. PSPCL has used available funds in the best manner by availing maximum rebate and delaying some other payments on which LPS was paid. Fund availability is mostly dependent on the release of subsidy and in case of delay in the release of subsidy by the Government of Punjab, funds cannot be arranged immediately through loans, being a time-consuming process.

Issue C4

viii. The Commission has further disallowed a total of Rs. 262.03 Crore in respect of power purchase cost from Kudgi thermal power station for true-up of FY 2022-23. The same constitutes a gross error on the part of the Commission. The power demand and supply position during the first half of FY 2022-23 was critical. Additionally, a power shortage was anticipated due to the critical coal stock position at the TSPL, where coal stock levels at times fell to as low as one day's supply, which was solely on account of the generator. The coal stock situation at another IPP, NPL was also significantly below healthy levels, again which was on account of the generator.

ix. The exchange prices were volatile and abnormally high during the morning and evening peak hours. This was attributed to an unprecedented increase in electricity demand nationwide due to an unexpected rise in temperature, leading to an early onset of summer. The demand and supply gap further widened due to fuel supply constraints, causing market prices to be abnormally high. Moreover, the MoP vide its circular dated 05.05.2022, had issued directions to all imported coal-based generating stations under Section 11 of the Electricity Act 2003, to operate at its full capacity. The states were advised that the coal price shall be made a pass-through. Even the domestic coal-based stations were directed to import at least 10% of the requirement for blending purposes. CGPL power of 475 MW was also unavailable to PSPCL due to the continued high prices of imported coal.

x. In light of the above, PSPCL anticipated that the arrangements in place for the upcoming paddy season (maximum demand period) might be inadequate. Punjab was expected to face challenges in ensuring an 8-hour supply to the agricultural sector while also meeting its obligations to other consumers. Therefore, before the start of the paddy season, PSPCL proactively pursued the matter with the MoP for the allocation of 1500-2000 MW from the Central Sector generating stations. This resulted in the temporary allocation of 500-1300 MW to Punjab from Kudgi TPP of NTPC by the MoP, as per the order dated 17.06.2022.

xi. The availability of reliable power from Kudgi TPP significantly aided PSPCL in meeting the demand across all consumer categories and fulfilling the all-time record demand. Amidst a nationwide and global energy crisis, it is noteworthy that NTPC Kudgi Power reduced PSPCL's dependency on the highly volatile exchange power market. Additionally, PSPCL was able to sell 282 MUs of energy at Rs. 8.84/unit, generating revenue worth Rs. 249 Crore during this period. It is important to acknowledge that no power regulatory measures or power cuts were imposed in 2022, unlike in 2021. Furthermore, despite the higher cost, PSPCL utilized the power judiciously and surrendered the quantum based on the prevailing market and demand scenario. However, the fixed charges remain a necessary commitment as reliability comes at a cost; thus, allowing fixed costs only for scheduled power would be unjust to the commitment from both parties (seller and procurer) for utilization based on availability and requirement.

xii. The fixed charges are paid for the availability of the plant as per the agreement between the generating station and the distribution licensee. These charges are part of the power purchase cost of the licensee and should be allowable as part of the expenses in the ARR. Moreover, this treatment has consistently been applied to all other generators in past and present tariff orders. Therefore, the Commission is urged to review this issue and allow Rs. 114 Crore of fixed cost to PSPCL.

xiii. It should be appreciated that if PSPCL had not secured power from the Kudgi Power Plant and had instead relied on the market to procure this quantum, the market prices proportional to the demand-availability gap would likely have been significantly higher, with uncertain availability.

xiv. Moreover, the average cost of short-term power purchased does not accurately reflect the true cost of meeting power requirements, as it includes the cost of power procured by PSPCL to capitalize on market opportunities for cheaper power while backing down higher-cost sources. This strategy optimizes overall power procurement costs and ensures that expensive sources are utilized only when absolutely necessary. Additionally, during the period when NTPC Kudgi was made available, exchange prices frequently hit the maximum cap level of Rs. 12/unit. Therefore, considering the cost of average short-term power is a significant error on the part of the Commission. Consequently, the Commission is urged to review and reverse the energy charge disallowance of Rs. 118.03 Crore.

Issue C5

xv. The Commission has also disallowed the fixed cost paid to Anta, Auriya, and Dadri stations of NTPC amounting to Rs. 30.73 Crore. PSPCL has terminated the PPA with Anta, Auriya, and Dadri plants and has not procured power through those PPAs. This power was allocated by the MoP as part of a package from its unallocated quota of power. The MoP retains an unallocated share from all Central Sector Generators, such as NHPC, NTPC (including Anta, Auriya, Dadri, etc.), and SJVN, at the regional level. Based on seasonal demand variations and the diversity of demand across different regions and states, and upon request from the states, the MoP periodically reallocates the beneficiaries of this power. In view of the above, the MoP allocated power from these plants, as part of a package, in addition to other plants, from its share of unallocated power to PSPCL. This allocation was made not on a permanent basis but to meet the state's demand reliably for a short duration, and PSPCL had no choice over plant selection. Furthermore, PSPCL has a PPA with NTPC for such unallocated power. The Government of India retains 15% of the installed capacity of Central Generating Stations as an unallocated quota, which is allocated to states based on their needs. Accordingly, the allocation made to PSPCL from this unallocated quota constitutes contracted capacity with Central Generating Stations. As such, PSPCL is liable to pay the fixed capacity charges for this unallocated power. This allocation was for a short period from 01.04.2022 to 28.04.2022 and from 05.05.2022 to 30.09.2022 and is not affected by the termination notice issued by PSPCL for long-term PPAs. As the fixed costs for the plants from which power was allocated become due, PSPCL is obligated to pay these costs.

xvi. PSPCL vide letter dated 06.09.2024 submitted additional submission with regards to Anta, Auraiya, and Dadri gas-based power stations as under:

a) The details of charges paid by PSPCL to M/s NTPC in respect of Anta, Auraiya, and Dadri gas-based power stations for FY 2022-23 are as under:

Table 5: Details of Charges paid to NTPC for Anta, Auraiya and Dadri

Name of Plant	Fixed Cost (Rs. Cr.)	Others (Rs. Cr.)	Total (Rs. Cr.)
Anta	1.79	3.42	5.22
Auraiya	2.75	20.05	22.80
Dadri	2.47	0.24	2.71
Total	7.01	23.71	30.73

b) The Commission had erred in disallowing the aforementioned charges amounting to Rs. 30.73 crore in the True-up of FY 2022-23. PSPCL had relinquished its allocated share of power from these gas-based power stations in accordance with the

Commission order dated 05.08.2021 passed in Petition No. 28/2021. This was followed by issuance of a six-month notice dated 12.08.2021 by PSPCL to M/s NTPC. The six-month period expired on 12.02.2022 for Anta and Auraiya and on 31.03.2022 for Dadri respectively.

c) However, M/s NTPC, *vide* bill dated 06.04.2022, claimed an amount of Rs. 3,42,00,000/- and Rs. 20,05,00,000/- towards depreciation charges for the Anta and Auraiya gas based power stations, respectively. PSPCL relinquished its share of power from 12.02.2022 onwards for Anta and Auraiya and from 31.03.2022 onwards for Dadri. PSPCL had accordingly deducted the said depreciation charges, amounting to Rs. 23,47,00,000/-, from M/s NTPC' bill dated 06.04.2022.

d) However, M/s NTPC, while relying on paragraph 2(IV) of the Ministry of Power Guidelines dated 22.03.2021 in its letter dated 19.05.2022, requested PSPCL to release the payment for the uncovered depreciation charges. Relevant extract of paragraph 2(IV) of the MoP guidelines dated 22.03.2021 is as under:

"IV. The relinquishment of such power shall be considered only after the State/Discoms have cleared all the past dues. The State/Discoms shall continue to be liable to make all eligible payments/dues as per the prevailing rules/regulations to the generators whose share of power has been relinquished till final settlement"

e) In view thereof, PSPCL had paid the depreciation charges amounting to Rs. 23.47 crores to M/s NTPC. PSPCL has requested the Commission to allow the actual cost of Rs. 30.73 crore paid by PSPCL to M/s NTPC towards the Anta, Auraiya, and Dadri gas-based power stations for FY 2022-23.

xvii. To the query of the Commission in this matter, PSPCL vide letter dated 08.11.2024 has confirmed as under:

a) It was conveyed by NTPC that PSPCL shall have to clear all past dues including unrecovered depreciation, ToP liability etc. Non payment of the past dues shall be construed as non-compliance of the MoP Guidelines and it may affect the relinquishment of PSPCL share from these stations. Accordingly, PSPCL paid Rs. 23.47 Crore to NTPC.

b) The unrecovered depreciation charges pertain to a period 11.02.2022 to FY 2023-24 onwards and it is not for previous years.

Issue C6

xviii. The Commission has disallowed Rs. 122.45 Crore from the power purchase cost on account of expenditure evaluated for net banking. However, this amount pertains to the premium paid on banking transactions during the year and is eligible as a valid power purchase cost. According to the accounting circular issued by PSPCL, energy sales/purchases are booked under GH-70.102, while banking premiums paid/received are booked under GH-70.103. Even then, the Commission did not consider the energy sold as premium paid and booked under GH-70.103 when allowing the tariff for FY 2022-23. The premium units paid have already been included in net banking energy and do not affect power availability. However, they must be added notionally for calculating the closing balance of banking utilities, as detailed below:-

Table 6: Details of Banking of Energy for FY 2022-23

Ledger Account of Energy Banking accounted for FY 2022-23								
Particulars	Units (MUs)	Rate (Rs./unit)	Amount (Rs. Cr.)		Particulars	Units (MUs)	Rate (Rs./unit)	Amount (Rs. Cr.)
Opening Balance	-1520.51	4.21	-640.13					
Purchase through banking	6,041.66	4.18	2,525.45		Sale through banking	5,729.87	4.17	2,389.35
Net premium paid (+) / received (-)	293.65	4.17	122.45					
					Closing balance	-915.07	4.17	-381.58
Total	4,814.80		2,007.77		Total	4,814.80		2,007.77

xix. PSPCL requested the Commission to allow banking premium amount to the tune of Rs. 122.45 Crore.

Issue C7

xx. In true-up for FY 2022-23 at page no. 64 of the Tariff Order, the Commission has considered the request of PSPCL to consider the amount of Rs. 3.59 Crore pertaining to TSPL in other charges. However, while considering the same, this Commission seems to have inadvertently mentioned: *"reduces Rs. 3.59 Crore from the variable charges of Rs. 4222.26 Crore and adds the same in the other charges of Rs. 1322.02 Crore"*. It is pertinent to mention here that the amount Rs. 1322.02 Crore pertains to fixed charges for FY 2022-23. The Commission is requested to clarify/rectify the same.

Commission's Analysis:

Issue C1

xxi. The disallowance of Rs. 385.58 Crore is on account of disallowance of 683.76 MkWh due to revised energy requirement and due to non-achievement of distribution loss trajectory by

PSPCL. The detailed rationale has already been explained in Para 3.3, 3.4, 3.7 and 3.10 of the Tariff Order for FY 2024-25.

With regard to PSPCL's submission regarding not giving any relaxation in the distribution loss trajectory based on actual losses of PSPCL, the Commission has already deliberated upon the matter in issue No.B above.

Issue C2

xxii. With regard to the disallowance of additional UI charges, the Commission observes that, the issues of additional UI and interest on delayed payment of the same has already been dealt in detail in point (i) of Para 3.10 'Commission's Analysis' of the Tariff Order for FY 2024-25 specifying the rationale for not allowing the said charges. As such, no further review lies.

xxiii. The Hon'ble APTEL in its judgment dated 29.04.2022 has observed that UI drawl below the frequency of 49.5 Hz shall be allowed to the extent that it is classified as the urgent need for maintaining the State Grid and to meet the emergent requirement of the consumers. The Hon'ble APTEL has nowhere in its order explicitly pointed out that additional UI charges are to be allowed to the licensee. The Commission in its Tariff Orders have been allowing the UI charges incurred by PSPCL on account of UI drawls (overdrawal/underdrawal) irrespective of the frequency as also pointed out by the Hon'ble APTEL in its judgment.

xxiv. Further, the Commission has only disallowed additional UI charges which are penal charges incurred by PSPCL over and above the UI charges for violating the grid discipline in line with Hon'ble APTEL's judgment dated 30.09.2019 in Appeal No. 246

of 2014, judgment dated 29.04.2022 in Appeal No. 264 of 2014, Appeal No. 173 of 2015 and Appeal No. 277 of 2015.

Issue C3

xxv. The Commission observes that it has been allowing working capital to PSPCL in the Tariff Orders. The revenue gap along with carrying cost, if any, is also being allowed in the Tariff Order in a timely manner without creating any regulatory asset. The details are already discussed in point (ii) of Para 3.10 'Commission's Analysis of the Tariff Order for FY 2024-25. Further 50% of the rebate received by PSPCL for timely payment for power purchases is being passed on to PSPCL as per PSERC MYT Regulations. PSPCL's submission in this regard is thus not correct and cannot be accepted.

Issue C4

xxvi. The issue of Kudgi has already been dealt with in detail in point (v) of Para 3.10 'Commission's Analysis' of the Tariff Order for FY 2024-25.The Commission in the Tariff Order for FY 2023-24 in Para 3.9 (B) 'Commission's Analysis' has already examined in detail and concluded that a huge quantum of power procured by PSPCL from Kudgi thermal plant was surrendered while power was also purchased in the power exchanges as per periodic requirements which shows lack of proper power purchase planning leading to duplicating of power purchase and burdening the consumers with the fixed cost of surrendered power. This amounts to double jeopardy for the consumers which the Commission cannot overlook or allow to PSPCL.

Issue C5

xxvii. The issue of disallowance of charges pertaining to Anta Auraiya and Dadri gas power stations has already been dealt with in detail in point (vi) of Para 3.10 'Commission's Analysis' of the Tariff Order for FY 2024-25 specifying the rationale for not allowing the said charges.

The Commission observes that PSPCL vide additional submission dated 06.09.2024 stated that out of Rs. 30.73 Crore, Rs. 7.01 Crore were on account of fixed charges and Rs. 23.71 Crore were other charges claimed by NTPC towards depreciation charges of these gas powers stations and paid to NTPC for unrecovered depreciation for the period 11.02.2022 to FY 2023-24 onwards as per NTPC demand in view of para 2(IV) of the Ministry of Power Guidelines dated 22.03.2021 which specifies as under:

"IV. The relinquishment of such power shall be considered only after the State/Discoms have cleared all the past dues. The State/Discoms shall continue to be liable to make all eligible payments/dues as per the prevailing rules/regulations to the generators whose share of power has been relinquished till final settlement"

The Commission notes that the referred guideline of the Ministry depicts the payment of past dues but not the payment of unrecovered depreciation to be paid by the procurer after the completion of the term and termination of the PPA. Also, PSPCL has not placed any rules and regulations before the Commission mandating the payment of unrecovered depreciation after completion of term and termination of the PPA. Accordingly, PSPCL's request to review the disallowance of Anta Auraiya and Dadri gas power stations in this regard cannot be accepted. PSPCL may take up the issue with NTPC for refund of the wrongly claimed depreciation for the period when the PPA was no longer in force or valid.

Issue C6

xxviii. The issue of Net banking has already been dealt with in point (vii) of Para 3.10 'Commission's Analysis' of the Tariff Order for FY 2024-25 specifying the rationale for not allowing the said charges.

The Commission notes that total purchases shown in ARR are as 6041.66 MkWh whereas total sale through banking is 5729.87MkWh. Accordingly, PSPCL has booked 311.80 MkWh as net banking against which Rs. 136.10 Crore has already been allowed to PSPCL. PSPCL is claiming additional power purchase cost on account of net premium paid/received as 293.65 MkWh which is nowhere considered / included in net power purchase quantum. Had PSPCL considered 293.65MkWh in its power purchase, even then the distribution loss would have been higher than that worked out during Truing up of FY 2022-23. Accordingly, the disallowance on account of non-achievement of target losses would have been more and this would have been disallowed.

Issue C7

xxix. The Commission has allowed other charges of Rs. 1325.61 Crore comprising of fixed charges of Rs. 1322.02 Crore and 3.59 Crore unloading charges. Accordingly, the Commission has already allowed Rs. 3.59 Crore in the Tariff Order for FY 2024-25 and there is no error/loss to PSPCL in the Commission's consideration.

The Commission observes that no new evidence has been produced (which was not within the knowledge of the PSPCL at the time when the decision/order was passed by the Commission) nor is there any mistake or error apparent on the face of the record. As such, the prayer with regard to review of the earlier Order on the issue of power purchase cost as requested by PSPCL is not sustainable and is hence disallowed.

D. EMPLOYEE COST

PSPCL's Submissions:

i. PSPCL submitted that this Commission has approved the Employee Cost for FY 2022-23 as Rs. 6,897 Crore on a normative basis, whereas the actual cost as per PSPCL's audited accounts was Rs. 6,981 Crore.

ii. PSPCL further submitted that the employees of PSPCL are regular staff of the corporation and being a government company, it is to be governed by the rules and regulations of the Government.

iii. PSPCL stated that the Appellate Tribunal *vide* judgment dated 29/04/2022, has held that PSPCL is entitled to receive the actual cost incurred in respect of its employees. Relevant extract of the judgment dated 29/04/2022 is as under:

> *"117. We reaffirm our decision taken in earlier appeals where in it was made clear that the Appellant is entitled to receive the actual cost incurred in respect of its employees. The State Commission needs to give a re-look and since this issue is fully covered by our earlier judgment dated 18.10.2012 in Appeal No. 7, 46 and 122 of 2011 and 11.09.2014 in Appeal No. 174 of 2012, it is decided in favour of the appellant."*

iv. PSPCL further stated that in view of the above directions, this Commission *vide* its order dated 08/02/2023, allowed actual employee cost for FY 2010-11 along with carrying cost.

v. PSPCL was directed by the Commission vide interim orders dated 20.09.2023 to clarify why it has changed its stance on this issue in FY 2022-23 ,since in FY 2020-21 and FY 2021-22 also normative amounts were allowed. Why is it seeking a review for claiming actual expenses when they are more than the normative amounts this time. PSPCL vide memo dated 08.11.2024 replied that it has always sought expenses based on actuals as per audited accounts and there is no change in its stance.

vi. PSPCL requested the Commission to approve the actual employee cost of PSPCL during true-up.

Commission's Analysis:

vii. O&M expenses are allowed as per MYT Regulation 2019 Regulation 26.1. Note 3 of the said Regulation is reproduced below:

"Note 3: O&M expense shall be allowed on normative basis and shall be trued-up only to the account of variation in Wholesale Price Index and Consumer Price Index."

viii. The Commission has correctly allowed the normative employee cost as per the above Regulation 26.1 note 3.

ix. In FY 2020-21, FY 2021-22 also the Commission had allowed employee cost on a normative basis which were more than the actual employee cost incurred by PSPCL. A comparative table is given below:

Table 7: Comparative Normative and Actual employee cost

(Rs. Crore)

Sr No	Year	Employee cost		
		Normative (Allowed)	Actual	Allowed more than the actuals
1	FY 2020-21	4937.07	4807.83	129.24
2	FY 2021-22	5487.25	5261.49	225.76

3	FY 2022-23	6897.29	6981.00	-83.71
4	Total	17321.61	17050.32	271.29

x. As seen in above table PSPCL has been allowed Rs.129.24 Crores and Rs 225.76 Crores more than the actuals in FY 2020-21 and FY 2021-22 respectively .No review was filed by PSPCL when it was allowed more than the actuals. Therefore, there exists no error apparent on the face of the record and even otherwise there exists no reasons to review and modify the order dated 14.06.2024.

E. REPAIR & MAINTENANCE (R&M) CHARGES

PSPCL's Submissions:

i. PSPCL stated that this Commission has disallowed R&M expenses amounting to Rs. 88.46 Crore. The disallowance has been due to the fact that this Commission has computed R&M expenses on a normative basis and the same is on the lower side than the actual R&M expenses as per audited accounts.

ii. PSPCL further stated that this Commission has erred in comparing the normative expense computed by it and the actual expenses incurred. The R&M expenses as submitted by PSPCL are as under:

Table: 8 Actual R&M expenses for FY 2022-23(Rs. Crore)

S. No.	Particulars	Amount
1.	R&M expenses as per Accounts	478.46
2.	Operating expenses of GGSSTP & GHTP: • *Cost of water* • *Lubricant & Consumable stores*	26.67 *23.83* *2.84*
3.	Operating expenses of BBMB: • *Lubricant & Consumable stores* • *Station Supplies*	5.832 *0.005* *5.827*
4.	Total R&M expenses of PSPCL	510.95

iii. PSPCL further submitted that, while approving the total R&M expenses for FY 2022-23, this Commission considered the actual BBMB expenses of Rs. 30.96 Crore, which includes the operating expenses of BBMB amounting to Rs. 5.83 Crore. However, the operating expenses of GGSSTP and GHTP plants totalling Rs. 26.67 Crore, which should have been considered over and above the normative expenses were erroneously excluded by this Commission. Therefore, PSPCL requested that this Commission may allow an additional R&M expense of Rs. 26.67 Crore in the true-up for FY 2022-23.

Commission's Analysis:

iv. O&M expenses are allowed as per the MYT Regulation 2019, Regulation 26.1. Note 3 of the said Regulation is reproduced below:

"Note 3: O&M expense shall be allowed on normative basis and shall be trued-up only to the account of variation in Wholesale Price Index and Consumer Price Index."

v. The Commission has correctly allowed the normative R&M expenses as per the above Regulation 26.1 note 3.

vi. Moreover while framing the baseline value of R&M expenses for the 2nd control period (FY 2020-2021 to FY 2022-2023) the operative expenses of the plant (GGSSTP and GHTP) were taken into consideration and therefore as per Regulations only variation to the account in Wholesale Price Index and Consumer Price Index has to be applied each year .Actual expenses of BBMB have been allowed because it has categorically been mentioned in Note 1 of Regulation 26.1 as reproduced below:

"Note 1: The O&M expenses of BBMB for the entire Control Period shall be projected separately based on the latest actual payout. The Commission shall true-up the O&M expenses of BBMB based on the actual payout. The O&M expense of BBMB shall be treated as an uncontrollable cost item. However, when CERC determines the tariff in respect of generating plants/units of BBMB, the Commission shall consider the same."

vii. Therefore, there exists no error apparent on the face of the record. Even otherwise there exists no reasons to review and modify the order dated 14.06.2024.

F. INTEREST ON LONG-TERM LOANS AND FINANCE CHARGES

PSPCL's Submissions:

i. PSPCL stated that this Commission has not fully allowed the interest and finance charges as claimed by PSPCL and has reduced the same and that the same constitutes an error or mistake on the face of record. PSPCL has claimed interest of Rs. 691 Crore (excluding interest on working capital and consumer security deposit) for long-term loans for FY 2022-23. However, this Commission has only allowed interest of Rs. 344 Crore.

ii. PSPCL further submitted that this Commission, while truing up the capital expenditure for the 2nd Control Period (FY 2020-21 to FY 2022-23), did not consider capital expenditure on the Shahpur Kandi project and Pachhwara Coal mine stating that the finance cost of the project will be considered at the time of COD. Hence, the interest cost of the same is not included in the interest and finance charges as approved by this Commission. However, while calculating the net interest cost, this Commission has deducted the interest capitalization related to the Shahpur Kandi project &

Pachhwara Coal mine. The interest cost capitalized in respect of the Shahpur Kandi Project and Pachhwara Coal mine trued up in the Tariff Order is as under:

Table No 9: Interest cost capitalized in respect of the Shahpur Kandi Project and Pachhwara Coal mine trued up in the Tariff Order

(Rs. Crore)

Sr No	Particulars	FY 2020-21	FY 2021-22	FY 2022-23
1	Capitalisation of interest deducted from Interest cost	218.52	192.47	238.81
2	Interest capitalised – Shahpur Kandi Project	151.07	125.48	181.20
3	Interest capitalised – Pachhwara Coal mine	-	15.90	16.66
4	Net interest capitalisation to be reduced from interest cost	67.45	51.09	40.95

iii. PSPCL stated that since this Commission did not consider the interest cost of the Shahpur Kandi project until its COD, the same principle should apply when allowing the capitalization of the interest cost. Therefore, an amount of Rs. 40.95 Crore (238.81 – 181.20 – 16.66) should be considered as capitalization of interest cost by this Commission for FY 2022-23. Consequently, an additional amount of Rs. 197.86 Crore should be allowed to PSPCL as interest cost and finance charges for FY 2022-23. On a similar basis, additional amounts of Rs. 151.07 Crore and Rs. 141.38 Crore for FY 2020-21 & FY 2021-22, respectively ought to be allowed to PSPCL.

iv. PSPCL further stated that this Commission has stated that PSPCL has never segregated the interest cost capitalized and has never raised the issue of excluding the interest cost capitalized of Shahpur Kandi Power Project. Further, it has stated that since

PSPCL has filed an appeal before the Appellate Tribunal being Appeal No. 449 of 2023 PSPCL would await the decision on this matter.

v. PSPCL submitted that this Commission has disallowed Rs. 5.40 Crore claimed as "*Interest on lease liabilities, Discount to Consumers, &Other Interest*" on an actual paid basis. This amount mainly includes discounts/rebates allowed to consumers, interest to suppliers/contractors, and other interest charges. PSPCL requested that this Commission may review the facts in this regard and allow the *Other Interest* of Rs. 5.40 Crore on an actual payment basis.

vi. PSPCL further submitted that the interest cost of Rs. 691 Crore represents the actual interest paid by PSPCL, hence the same ought to be allowed in full by this Commission.

Commission's Analysis:

vii. The Commission has determined Interest & Finance Charges as per Regulation 24 of PSERC MYT Regulations, 2019.The Commission allows 100% funding as per the approved capex and not on actual loans taken. While calculating interest on long term loans, interest capitalised as per books of account is reduced from the total interest as per the Regulation.

viii. In petition no 64 of 2023 for true up of FY 2022-23 PSPCL had claimed interest capitalized amounting to Rs 238.81 Crores out of which Rs 187.63 Crores was shown as the interest capitalized pertaining to Shahpur Kandi project for FY 2022-23.In this review it is now claiming Rs 181.20 Crores as the amount of interest capitalized for FY 2022-23 pertaining to SKPP. There is difference in the figures being claimed for FY 2022-23. The Commission has reviewed the claim of PSPCL and allows non capitalization of interest of Rs 181.20 Crores as per current figures communicated along with carrying cost. Similarly the Commission also allows non capitalization of interest amounting to Rs 16.66 Crores relating to Pachhwara Coal Mines along with carrying cost . The impact of this will be given in the next tariff order.

ix. The Commission has not considered the claim of PSPCL for the previous years i.e. FY 2020-21 and FY 2021-22 regarding non capitalization of interest as PSPCL has filed Appeal no 449 of 2023(DFR No.168 of 2023) in APTEL against PSERC's order dated 08.02.2023 in Review Petition no. 5 of 2022 in Petition no 68 of 2021 and appeal no 403 of 2024 (DFR no 369 of 2024) in APTEL against PSERC's order dated 06.06.2024 in Review Petition no. 04 of 2023 in Petition no 74 of 2022 on a this issue which is under adjudication.

x. PSPCL claim of interest on lease liabilities, discount/rebate allowed to consumers and interest to suppliers/consumer claimed as 'other interest' which mainly includes discounts/rebates allowed to consumers, interest to suppliers/contractors, and other interest charges cannot be considered as per 24.4 Regulation which is reproduced as under:

> "*The Commission shall allow obligatory taxes on interest, finance charges (including guarantee fee payable to the Government) and any exchange rate difference arising from foreign currency borrowings, as finance cost"*.

Moreover, a delayed payment cost is the responsibility of PSPCL and the cost cannot be passed through to the consumers. As such the prayer for review of the earlier Order on this issue is denied.

G. INTEREST ON WORKING CAPITAL

PSPCL's Submissions:

i. PSPCL submitted that PSPCL has claimed the interest on working capital loans on the basis of actual interest paid against the loans availed by PSPCL, whereas this Commission has allowed the interest on a normative basis.

ii. PSPCL further submitted that while working out the normative working capital for FY 2022-23, this Commission has reduced power procurement cost for one month i.e., Rs. 2,227.87 Crore. PSPCL stated that the same has made a huge impact on interest on working capital allowed by this Commission in the 2nd Control Period. Therefore, the reduction of Power Procurement cost needs to be reviewed by this Commission.

Commission's Analysis:

iii. Interest on working capital has rightly been allowed on normative basis and not on actual loan taken as per Regulation-25 of PSERC MYT Regulation-2019.

iv. Further, while working out working capital requirement for retail supply business, power procurement cost for one month has been rightly reduced as per Regulation-43.2 of PSERC MYT Regulations-2019.

v. PSPCL has also filed Appeal no 449 of 2023(DFR No.168 of 2023) in APTEL against PSERC order dated 08.02.2023 in Review Petition no. 5 of 2022 in Petition no 68 of 2021and Appeal no 403 of 2024 (DFR no 369 of 2024) in APTEL against PSERC order dated 06.06.2024 in Review Petition no. 04 of 2023 in Petition no 74 of 2022 on a similar issue which is still under adjudication.

vi. Thus, no new record or evidence has been produced (which was not within the knowledge of PSPCL at the time when the data was furnished by PSPCL and order was passed by the Commission) nor has any mistake or error apparent on the record been pointed out to justify any review. As such the prayer for review of the earlier Order on this issue is denied.

H. RETURN ON EQUITY (RoE)

PSPCL's Submissions:

i. PSPCL submitted that this Commission has computed the RoE for FY 2022-23 as Rs. 974.74 Crore.

ii. PSPCL further submitted that this Commission may kindly allow RoE for FY 2022-23 on equity amount of Rs. 6,081.47 Crore without prejudice to the claim pending before the Appellate Tribunal regarding the allowance of RoE on additional equity of Rs. 4,592.96 Crore.

iii. PSPCL stated that under Clause 1.2 of the Memorandum of Understanding under the UDAY Scheme, 75% of the debt as on 30/09/2015 amounting to Rs. 15,628.26 Crore was to be taken over by the Government of Punjab (hereinafter being referred to as "GoP"). In compliance with the above, the said amounts have been converted to equity, which does not entail any repayment. The same requires consideration by this Commission.

iv. PSPCL further stated that the amount of Rs. 15,628.26 Crore comprises of Capital Expenditure loans of Rs. 2,246.77 Crore and Working Capital loans of Rs. 13,381.49 Crore. This Commission has allowed interest on Rs. 2,246.77 Crore up to FY 2019-20 being capital expenditure loans.

v. PSPCL submitted that this Commission has disallowed the interest on Working Capital loans used for capital expenditure from FY 2010-11 to FY 2018-19. Out of Rs. 13,381.49 Crore, Rs. 2,346.19 Crore of working capital has been used for Capital Expenditure duly approved by this Commission.

vi. PSPCL further submitted that RoE of Rs. 4,592.96 Crore (2246.77 + 2346.19) along with the return of Rs. 6,081 Crore of equity base and balance equity capital must be adjusted as equity contribution on normative basis in accordance with Regulation 19 and 20 of the Tariff Regulations, 2019.

vii. PSPCL further stated that the very purpose of the UDAY Scheme was to reform the sector and to ensure that the distribution licensees' function in a viable manner. The disallowance would only result in the same financials continuing without the loans being able to be serviced.

viii. PSPCL submitted that it reserves its right to claim RoE on the amount of Rs. 4,592.96 Crore (2246.77 + 2346.19) used for capex along with the return on Rs. 6,081 Crore of equity base, subsequent to the decision of the Appellate Tribunal in this matter.

Commission's analysis:

ix. The Commission has not considered the amount of Rs 4592 crores in Tariff order for FY 2022-23 issued on 31.03.2022 as additional equity. The Relevant part of the tariff order in para 3.21 is reproduced below:

> "*The Commission has not considered the amount of Rs. 4592 Crore (Rs. 2346.19 Crore + Rs. 2246.77 Crore) in addition to the amount of Rs. 6081 Crore to admissible equity for return. Accordingly, no addition of equity has been considered by the Commission to the opening equity of FY 2020-21 on account of conversion of UDAY loans of Rs.2246.77*

Crore as it is not utilized for meeting the capital expenditure for new Projects. Similarly Rs.2346.19 Crore as claimed by PSPCL which was diverted for capital expenditure funding is also not considered for infusion towards equity as these were working capital loans of prior period.

The UDAY loans approved by the Commission till FY 2019-20 have been reduced from the opening loans of FY 2020-21. The Commission has considered the opening equity for FY 2020-21 as the approved closing of equity from the True-up of FY 2019-20."

x. In this Commission's order dated 03.04.2017 in review petition no 5 of 2017 in petition no 90 of 2016, the interest and finance charges on diverted working capital loans used for funding the capex were rejected. The relevant part of the order is reproduced below:

"In view of the above, FY 2010-11 to FY 2013-14, whose True-Up has already been concluded cannot be re-opened. Further, in all previous years, the Commission had allowed the interest on long term loans for capital expenditure as per the claim of the petitioner. In addition to the long term loans, the Commission had also allowed interest on General Provident Fund as claimed which had been utilized for the purpose of capital investment as per PSPCL. The petitioner had never claimed advance against depreciation in the previous years though it is provided for in the relevant regulations. It is only in the review petition that the petitioner is raising the new claim of advance against depreciation.

The scope of an application for review is restricted and the Commission can review its Order on discovery of new or important matters or evidence or if it is shown that Orders sought to be reviewed suffer from some mistake/error apparent on the face of the record or other reasons which in the opinion of the Commission is sufficient for reviewing the earlier Order/decision. This claim of the Petitioner is not tenable and cannot be considered as 'mistake apparent from the record'.

xi. PSPCL has also filed Appeal no 449 of 2023(DFR No.168 of 2023) in APTEL against PSERC order dated 08.02.2023 in Review Petition no. 5 of 2022 in Petition no 68 of 2021 and Appeal no 403 of 2024 (DFR no 369 of 2024) in APTEL against PSERC order dated 06.06.2024 in Review Petition no. 04 of 2023 in Petition no 74 of 2022 on a similar issue which is under adjudication.

xii. Thus, no new record or evidence has been produced (which was not within the knowledge of PSPCL at the time when the data was furnished by PSPCL and order was passed by the Commission) nor has any mistake or error apparent on the record is seen to justify any review. As such the prayer for review of the earlier Order on this issue is denied.

I. OTHER DEBITS AND EXTRAORDINARY ITEMS

PSPCL's Submissions:

i. PSPCL submitted that this Commission has disallowed Rs. 19.56 Crore from the other debits claimed by PSPCL in the true up of FY 2022-23. The expenses disallowed are Rs. 3.34 Crore pertaining to compensation for injuries, death and damages for the staff and Rs. 16.22 Crore pertaining to loss on sale of stores.

ii. PSPCL further submitted that Rs. 3.34 Crore pertains to compensation paid for crop / fatal & non-fatal cases/contractors. These types of losses are covered under the miscellaneous losses as defined in Regulation 47 of MYT Regulations 2019. Moreover, this Commission has allowed these losses in the true-up of previous years. Therefore, this Commission is requested to reconsider the facts pertaining to this issue and allow this as an expense in the True-up of FY 2022-23.

iii. PSPCL stated that with respect to the loss on sale of stores of Rs. 16.22 Crore all efforts were made to utilize maximum material (spare/consumables) in other plants of PSPCL for disposal of store inventory of GNDTP Bhatinda. Balance store inventory of

GNDTP was disposed off by E-Auctioning through Sale order no. 01/GNDTP-22 dated 09/08/2022 issued to M/s HR Commercial Pvt. Ltd., Mumbai as per approval of High Empowered Committee comprising of Director/Generation, Director/Finance, Director/Administration, CE/Store, and Workshop and CE/GHTP. Inventory was sold to M/s HR Commercial Pvt. Ltd. for Rs. 6,99,32,697/- against the book value of Rs. 23,21,06,520/- and a net loss of Rs. 16,21,73,823/- was booked to GH 79 during FY 2022-23 on sale of inventory. As the sale of stock was made in FY 2022-23, the resultant loss was booked in FY 2022-23 also. Therefore, this Commission is requested to reconsider this issue and allow this as an expense in the True-up of FY 2022-23.

Commission's analysis:

iv. The Commission in tariff order for FY 2023-24 in para no 2.34, had stated that the issue of impairment loss of GNDTP will be considered after the disposable of all the assets of GNDTP. Therefore the above issue of loss on account of sales of stores of GNDTP will also be considered at that time.

J. REVENUE

PSPCL's Submissions:

i. PSPCL submitted that this Commission has erred in over-stating the revenue from the existing tariff of PSPCL. This Commission has erred in not proceeding with the actual audited accounts of PSPCL in regard to its revenue which are based on actual figures after statutory audit by the statutory auditors of PSPCL and also by the *Comptroller and Auditor General of India*, and consequently artificially over-stating the revenues of PSPCL. This is an error apparent on the face of the record. This has resulted in a difference in revenue from metered sales as per billing and as per accounts data of Rs. 474 Crore in the Tariff Order. the issue has been decided by the Appellate Tribunal by way of decision dated 29/04/2022 in Appeal No. 264 of 2014 and Appeal No. 173 of 2015, wherein the Appellate Tribunal, after taking into consideration identical submissions made by PSPCL has held as under:

> *"154. There cannot be any dispute that the State Commission is required to consider the expenditure of the Appellant and allow the expenditure, subject to prudence check, to be recovered in the tariff from the consumers. The tariff is based on the expenses permitted to be incurred. The State Commission however cannot have notional income to be accounted for the Appellant, on the basis of assumptions, when the revenue has not been received by the Appellant…*
>
> *…*
>
> *160. We are not satisfied with the submissions of the State Commission, which are incomplete and are deprived of any merit. Their response cannot be appreciated.*
>
> *161. We direct the State Commission to look into this afresh based on the submissions of the Appellants and decide on the issue afresh."*

ii. In view of the above, this Commission is prayed to consider actual revenue as per the audited accounts of PSPCL.

Commission's Analysis:

iii. Hon'ble APTEL in its Judgment dated 29.04.2022 in Appeal No. 264 of 2014, 173 of 2015 and 277 of 2015 has directed this Commission to look into the matter of Revenue afresh based on the submissions of the Appellants and decide on the issue.

iv. As per para 3.35 of the Tariff Order for FY 2024-25, the Commission has trued up Revenue from the Sale of Power for FY

2022-23 as Rs 37865.02Crore. The relevant part of the order is as under:

"PSPCL has not provided the slab-wise sale as recorded in the books of accounts. To validate the revenue, the Commission directed PSPCL to provide the billing data. PSPCL submitted the same vide Memo No. 191 dated 14.02.2024.

The Commission observed as under:

1. *The revenue from sale of power in the audited accounts was less than shown in the actual billing data. The Commission decided to consider the metered category-wise revenue from fixed charges, energy charges, FCA, surcharge/incentives and sundry charges as per the actual billed data.*

2. *In response to the Commission's query regarding the Sundry Allowances of Rs. (-) 274.17 Crore as shown in the Accounts data. PSPCL replied vide memo no. 191 dated 14.02.2024 that there are various types of adjustments being accounted for through sundry charges and allowances which cannot be quantified. However, as per Billing data the surcharges booked are Rs. -132.57 Crores and sundry charges booked are Rs.38.02 Crores. Both the figures of accounts and billing data are contradictory. PSPCL has been providing the same reply to the Commission's query regarding this in the previous years also. Thus, without any proper break up, it is difficult to validate the sundry charges and allowances by the Commission.*

3. *Further, the fixed charges as per audited accounts are Rs. 3067.14 Crore whereas as per the billing data these have been shown as Rs. 2826.24 Crore. A major difference is in the domestic and Medium Supply categories in which fixed charges do not commensurate with the sanctioned load/contract demand submitted by PSPCL. PSPCL has also not given the breakup of category wise subsidized fixed charges of Rs. 546.42 Crore. It is therefore, difficult to work out the category wise fixed charges as per audited account and match it with the billing data or the assessed revenue. If calculated as per the given data, the huge variation*

between the fixed charges as per the audited accounts and billing data indicates that one of them is factually incorrect. Therefore, due to this variation, the fixed charges in respect of domestic and medium supply categories have been considered as calculated from sanctioned load/contract demand. In addition to the above, the billing data as supplied by PSPCL has been considered for finalization of revenue for FY 2022-23.

…………….

4.The revenue from AP has been assessed on the basis of energy sales approved for AP in para 3.2.2. The revenue from the Common Pool and outside state sales have been considered as per the Audited Annual Accounts……….”

v. The Commission had observed that there was a gap between revenue from sale of power as per Annual Audited Accounts and revenue worked-out with reference to sales units as per actual billing data intimated by PSPCL at the approved tariff rate of various categories. PSPCL did not submit slab-wise sale as recorded in the books of account. PSPCL reasoned that many a times, when a consumer complains of excess/wrong billing, the field office generally corrects/modifies the bill physically ,thereby amending the amount due in his account. However, such corrections in units are not rectified/adjusted in the billing data, resulting in recording of excess/less units in comparison to the sales booked. This has resulted in differences in accounting figures and billing data. Thus, keeping in view this gap in financial reconciliation, the Commission concludes that the difference is due to non-reconciliation of financial and technical data within PSPCL’s own organization.

vi. Once the reconciliation of billing is done and correctly reflected in the Annual Audited Accounts and the financial gap is closed with technical data, the perceived revenue difference challenged by

PSPCL in their submissions based on billing during the year would be duly adjusted in the audited accounts of the forthcoming years. The extra billing/underbilling adjustment would find appropriate space in the reconciled billing data in the audited accounts, thus making this issue revenue neutral. It is in PSPCL's own interest to sort out their internal accounting issues. The Commission cannot put burden of PSPCL's inefficiency on to the consumers. This fact has been repeatedly pointed out by the Commission but regrettably the PSPCL has failed to put its own house in order.

vii. PSPCL has also filed Appeal no 449 of 2023(DFR No.168 of 2023) in APTEL against PSERC order dated 08.02.2023 in Review Petition no. 5 of 2022 in Petition no 68 of 2021 and Appeal no 403 of 2024 (DFR no 369 of 2024) in APTEL against PSERC order dated 06.06.2024 in Review Petition no. 04 of 2023 in Petition no 74 of 2022 on a similar issue which is not yet decided.

viii. Thus, no new record or evidence has been produced (which was not within the knowledge of PSPCL at the time when the data was furnished by PSPCL and order was passed by the Commission) nor any mistake or error apparent on the record is present to justify any review. As such the prayer for review of the earlier Order on this issue is denied. The Commission reiterates its advice to PSPCL to make immediate and concerted effort to resolved its internal accounting issues in its own interest rather than trying to perpetrate a wrong and seek undue relief in such reviews.

2. ESTIMATION OF ARR FOR FY 2024-25:

A. Target Distribution Loss For 3rd Control Period

PSPCL's submissions:

i. For FY 2024-25 of the 3rd Control Period, the distribution loss target has been fixed by the Commission as 12.10% in the Business Plan and CIP Order for the 3rd Control Period, whereas the actual distribution loss computed by the Commission for FY 2022-23 is 12.93%.

ii. The year-wise distribution loss trajectory and the actual losses computed by the Commission for the trued-up years are as under:

Table 10: Year wise Details of Distribution Loss

Year	Target Distribution Loss (%)	Actual Loss computed by PSERC (%)
2020-21	12.94	13.43
2021-22	12.34	12.68
2022-23	12.04	12.93
2023-24	12.30	-
2024-25	12.10	-
2025-26	11.90	-

iii. As per the MYT Regulations 2022, "*the* Commission *may change the values for Base Year and consequently the trajectory of parameters for the Control Period, considering the actual figures*". PSPCL requested that the distribution loss trajectory for the 3rd control period may be reviewed with respect to the actual losses of FY 2022-23.

Commission's Analysis:

v. The Commission in petition No. 49 of 2022 of the CIP Order dated 11.01.2023 had approved the projected loss trajectory of 12.10% for FY 2024-25. The Commission has clearly mentioned that the distribution loss trajectory shall be subject to revision based on actual figures for FY 2022-23 true up but will not be considered if higher than the approved trajectory.

Thus, higher distribution loss for FY 2022-23 should not be construed as a ground to cover the inefficiency of PSPCL on account of non-achievement of loss for reviewal of loss trajectory approved by the Commission.

The Commission observes that no new or important matter or evidence has been produced (which was not within the knowledge of the PSPCL at the time when the decision/order was passed by the Commission) nor is there any mistake or error apparent on the face of the record. As such, the prayer with regard to review of the earlier Order on the issue of Distribution Loss trajectory for 3rd MYT Control period, as requested by PSPCL, is not allowed. The original order is reaffirmed.

B. Power Purchase

PSPCL's submission:

i. PSPCL had projected power purchase cost of Rs. 30,062 Crore for FY 2024-25 against which the Commission has only allowed Rs. 29,625 Crore.

ii. Out of Rs. 437 Crore disallowed in FY 2022-23, Rs. 114 Crore relates to revision of cost projected from GVK. The Commission has disallowed Rs. 173 Crore in respect of Temporary General Network Access (TGNA) charges on account of the reduced power purchase quantum approved by it.

Issue B1:

iii. The upfront transmission charges for short-term open access were eliminated for a distribution licensee holding Long-Term Open Access, Medium-Term Open Access, or both, post the implementation of the CERC (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2020. Subsequently, open access charges became minimal. Following the enactment of GNA/TGNA regulations by the Central Electricity Regulatory Commission effective from 01.10.2023, transmission charges for TGNA (Temporary-GNA for Short Term Open Access, all arrangements like Banking, Purchase under short term, etc. not only for purchase of power) are applicable for energy transfer exceeding the approved GNA capacity. Thus, according to GNA Regulations, the transmission charge rate for T-GNA, in Rs/MW/time block, for a state will be published monthly by the Implementing Agency in accordance with the applicable Sharing Regulations. The above submission has been noted by the Commission in the Tariff Order, however, it has approved an amount of Rs. 168 Crore citing short-term power purchase of 3,174 MUs (3,619 MUs minus 445 MUs) whereas PSPCL is claiming the amount of Rs. 341 Crore with respect to the import of banking power during June to September (6,458 MUs) which is shown in detail in Format D4 of the Tariff Petition.

Issue B2:

iv. In addition to the above, it is submitted that PSPCL had submitted the cost pertaining to variable charges (after revision of GVK cost) as Rs. 21,244 Crore for FY 2024-25, whereas the Commission has approved Rs. 21,094 Crore against it (corrected as PSPCL in the review petition has wrongly mentioned this as Rs. 21,904 Crore). The disallowance of Rs. 150 Crore has been made without any justification.

Commission's Analysis:

Issue B1:

v. The Commission in Para 4.9 of Tariff Order under "Commission's Analysis" has provided a detailed rationale for allowing TGNA charges. The Commission in the Tariff Order has allowed TGNA charges as per short term power purchase quantum submitted by PSPCL duly reduced in proportion to the lower net power purchase requirement allowed by the Commission. Now PSPCL has claimed the amount of Rs. 341 Crore with respect to the import of 6458 MkWh banking power during June to September. However, PSPCL has not submitted the above data in the ARR Petition. The Commission has noted PSPCL's submission and accordingly, the projected charges shall be trued up in the ARR for FY 2026-27 as per actuals after due prudence check.

Issue B2:

vi. The Commission has accepted the variable rate submitted by PSPCL. The reduction, however, is due to the reduced quantum of power approved by the Commission. As such, the prayer with regard to review of this issue, is not allowed. The original order is reaffirmed.

C. RETURN ON EQUITY (RoE)

PSPCL's Submissions:

i. PSPCL submitted that this Commission has allowed RoE of Rs. 974.74 Crore for FY 2024-25. PSPCL has already made submissions in this regard in the review of true up of FY 2022-23 and is not repeating them herein for the sake of brevity. PSPCL further submitted that it reserves its right to claim RoE on the amount of Rs. 4,592.96 Crore (2246.77 + 2346.19) used for capex along with the return on Rs. 6,081 Crore of equity base, subsequent to the decision of the Appellate Tribunal.

Commission's Analysis:

ii. In para-4.19 of the Tariff Order for FY 2022-23 issued on 31st March,2022, the Commission has not allowed the addition of Rs. 4592 Crores towards Equity, relevant para is reproduced as under:

> *"The Commission has not considered the amount of Rs. 4592 Crore (Rs. 2346.19 Crore+ Rs. 2246.77 Crore) in addition to amount of Rs. 6081 Crore to admissible equity for return. Accordingly, no addition of equity has been considered by the Commission to the opening equity of FY 2020-21 on account of conversion of UDAY loans of Rs.2246.77 Crore as it is not utilized for meeting the capital expenditure for new Projects. Similarly, Rs.2346.19 Crore as claimed by PSPCL which was diverted for capital expenditure funding is also not considered for infusion towards equity as these were working capital loans of prior period".*

Thus, the Commission has considered the opening equity for FY 2024-25 as the approved closing of equity from the True-up of FY 2022-23 and has accordingly determined Return on Equity for FY 2024-25.

iii. PSPCL has also filed Appeal no 403 of 2024 (DFR no 369 of 2024) in APTEL against PSERC's order dated 06.06.2024 in Review Petition no. 04 of 2023 in Petition no 74 of 2022 on a similar issue which is not yet decided.

iv. Thus, no new record or evidence has been produced (which was not within the knowledge of PSPCL at the time when the data was furnished by PSPCL and the order was passed by the Commission) nor has any mistake or error apparent on the record been presented to justify any review. As such the prayer for review of the earlier Order on this issue is denied.

D. CARRYING COST ON DELAYED PAYMENT OF SUBSIDY

PSPCL's Submissions:

i. PSPCL submitted that this Commission has allowed interest on the delayed payment of subsidy granted by the Government of Punjab. PSPCL further submitted that while allowing the interest on delayed payment of subsidy, total subsidy due during the year has been evenly distributed in all months, whereas it is more appropriate if it is taken into consideration on a consumption basis at monthly intervals due to the fact the amount of subsidy is on the higher side in the months of the paddy season and summer season in comparison to the remaining period of the year.

ii. PSPCL stated that consumption-based data of AP subsidy on a monthly basis is already provided in the ARR Petition and the quarterly consumption data for Domestic and Industrial subsidy, as shown below may be converted into monthly basis by equally distributing the same for 3 months:

Table 11: Quarterly consumption data for Domestic and Industrial subsidy as submitted by PSPCL. (Rs. Crore)

Sr No	Particular	Domestic	Industry
1	Q1 for FY 2022-23	1,108.56	528.31
2	Q2 for FY 2022-23	1,876.05	644.91
3	Q3 for FY 2022-23	1,542.95	516.09
4	Q4 for FY 2022-23	1,199.28	450.79
5	Total	5,726.84	2,140.10

iii. PSPCL further stated that it has already provided the data for subsidy for all categories on a quarterly basis to this Commission during FY 2023-24 in compliance with the SoPs issued under the RDSS Scheme on subsidy accounting and payment by MoP.

iv. PSPCL submitted that this Commission in this Tariff Order has allowed subsidy for FY 2022-23 amounting to Rs. 15,570.92 Crore against the claim of Rs, 15,668.54 Crore. The carrying cost has been computed by this Commission as Rs. 669.59 Crore. If the same were to be computed on a consumption basis then the same would amount to Rs. 727.23 Crore.

v. PSPCL prayed to this Commission to allow carrying cost on delayed payment of subsidy on a consumption basis.

Commission's Analysis:

vi. Methodology of Payment of interest adopted by the Commission is the same as being done since inception. However this prayer for review of the earlier Order on this issue will be considered subject to supply of consumption based subsidy data(slabwise /category wise) for all categories. If PSPCL supplies the above data as directed by the Commission repeatedly, the same will be considered during the true-up of this year for which the request has been filed.

vii. PSPCL has also filed Appeal no 403 of 2024 (DFR no 369 of 2024) in APTEL against PSERC's order dated 06.06.2024 in Review Petition no. 04 of 2023 in Petition no 74 of 2022 on a similar issue which is not yet decided.

E. GST PAYABLE BY GOVERNMENT OF PUNJAB

PSPCL's Submissions:

i. PSPCL submitted that this Commission has allowed the subsidy payable by the Government of Punjab during FY 2022-23 and has inadvertently not allowed the GST amount of Rs. 12.03 Crore. It is pertinent to note that PSPCL has already paid GST of Rs. 12.03 Crore on meter rent and service rent to the State Government and simultaneously, shown this amount as recoverable. PSPCL further submitted that it has been charging meter rent in its electricity bills, however, in case of zero billing for domestic consumers having consumption up to 300 units per month, due GST on meter rent has been deposited by it to the Government and also the same amount has been shown as recoverable from the Government of Punjab.

ii. PSPCL submitted that GST being a tax liability cannot be shown in the profit and loss statement of PSPCL as revenue. As such, this amount has been shown as the amount recoverable from the Government of Punjab after discharging the liability of the same. Accordingly, this amount of Rs. 12.03 Crore is required to be allowed by this Commission on account of free electricity provided to domestic consumers. PSPCL requested that this amount of Rs. 12.03 Crore along with carrying cost as recoverable from the Government of Punjab for FY 2022-23 be allowed.

Commission's Analysis:

iii. The Commission observed that zero bills needed to be raised in case of domestic consumers having consumption up to 300 units per month, so the GST on meter rent applicable at that time had to be deposited by PSPCL to the government .Therefore since this expense was a statutory liability, the Commission allows GST on meter rent amounting to Rs 12.03 Crores along with carrying cost as recoverable from Government of Punjab as part of subsidy. The impact will be accounted for in the next tariff order.

F. CARRYING COST PAYABLE BY THE GOVERNMENT OF PUNJAB

PSPCL's Submissions:

i. PSPCL submitted that this Commission *vide* para 6.23 of the Tariff Order for FY 2014-15 has allowed an amount of Rs. 379.95 Crore as carrying cost payable by the Government of Punjab to PSPCL. Further, *vide* Tariff Order for FY 2016-17 *(Page no. 206*), this Commission had held as under:

> *"Accordingly, the net benefit of carrying cost of Rs. 80.26 (92.79-12.53) Crore relating to FY 2012-13 and FY 2013-14 is passed on to GOP."*

ii. Further, this Commission *vide* Tariff Order for FY 2017-18 *(Page no. 223)* had held that:

> *"The carrying cost on revenue gap of Rs. 113.17 Crore for FY 2014-15, amounting to Rs. 12.79 Crore (Rs. 6.39 Crore for six months of FY 2014-15 and Rs. 6.40 Crore for six months of FY 2015-16) is allocated to GOP"*

iii. PSPCL further submitted that this Commission *vide* the present Tariff Order has determined the carrying cost of Rs. 122.89 Crore payable by the Government of Punjab to PSPCL. A summary of all amounts payable by the Government of Punjab to PSPCL is shown below:

Table No 12: Summary of all amounts payable by the Government of Punjab as submitted by PSPCL (Rs. Crore)

Sr No	Tariff Order Year	Amount
1	FY 2014-15	379.95
2	FY 2016-17	-80.26
3	FY 2017-18	12.79

4	FY 2023-24	122.89
5	Total	435.37

iv. PSPCL stated that this Commission in the present Tariff Order, (in terms of the Appellate Tribunal's remand back *vide* order dated 29/04/2022) has allowed carrying cost recoverable from the Government of Punjab amounting to Rs. 319.73 Crore, out of which carrying cost to the tune of Rs. 196.84 Crore has been included in the amount recoverable from the Government of Punjab in the true-up of FY 2021-22. The remaining amount of Rs. 122.89 Crore has been separately mentioned as the amount paid by the Government of Punjab to PSPCL on account of carrying costs. The above-mentioned amounts for FY 2014-15, FY 2016-17, and FY 2017-18 were similarly directed as recoverable by this Commission. These amounts are yet to be paid by the Government of Punjab along with the amount paid on account of subsidy dues.

v. PSPCL further stated that it has been pursuing the matter with the State Government to sanction and release the amount of Rs. 435.37 Crore along with the carrying cost of Rs. 370.53 Crore. However, the Government has not yet acceded to PSPCL's request. PSPCL submitted that on the other hand, the State Government has accorded its approval to clear the total outstanding subsidy of Rs. 9020 Crore in the next 5 years starting from FY 2022-23 as per the liquidation plan approved under the RDSS scheme and is releasing the amount to PSPCL in compliance of the same.

vi. PSPCL further submitted that this Commission has determined the shortfall amount payable by the Government of Punjab to PSPCL amounting to Rs. 6,274.66 Crore ending FY 2023-24 which does not include the above amount of Rs. 435.37 Crore in respect of carrying cost payable by the Government of Punjab to PSPCL. PSPCL prayed that this Commission may determine the shortfall amount payable by the State Government by including the above amount of Rs. 435.37 Crore along with carrying cost from each respective year.

Commission's Analysis:

vii. The Commission in its order dated 22.08.2014 in Petition no. 63 of 2013 had directed PSPCL to recover the carrying cost on revenue gap from the Government of Punjab due to late finalization of Opening Balance sheet of PSPCL which has been notified by GoP on 24.12.2012. The relevant para 6.23.1 is reproduced below:

"6.23.1 The Commission……

………

PSPCL was unable to furnish Audited Annual accounts for FY 2010-11 for true-up in time i.e. during FY 2012-13 due to late finalization of the Opening Balance Sheet of PSPCL by GOP. This Commission , further,decides that the carrying cost due to delay in the finalisation of the Opening Balance sheet of PSPCL ,which has been notified by GOP on 24.12.2012 ,is attributable to Government of Punjab.

……..."

viii. Further, the Commission in order dated 15.05.2023 , had worked out Rs 319.73 Crores as carrying cost attributable to GOP on amount allowable as per order passed by Hon'ble APTEL in appeal no 264 of 2014 ,173 of 2015 and 277 of 2015.

ix. The Commission works out the subsidy as per the commitments made by the State government and also the carrying cost on the outstanding subsidies. However, recovery of carrying cost determined by the Commission in different tariff orders attributable to the State government due to late finalization of the balance sheet is a matter between PSPCL and the State Government and is to be taken up with the State Government at PSPCL's level directly as already indicated in the earlier orders of the Commission. As such the prayer for review of the earlier Order on this issue is not admissible.

x. PSPCL has also filed Appeal no 403 of 2024 (DFR no 369 of 2024) in APTEL against PSERC order dated 06.06.2024 in Review Petition no. 04 of 2023 in Petition no 74 of 2022 on a same issue which is not yet decided.

G. TERMINAL BENEFIT TRUST

PSPCL's Submissions:

i. PSPCL submitted that this Commission has not allowed for progressive funding of the Terminal Benefit Trust stating that PSPCL has not operationalized the pension trust and has not made any provision for progressive funding of terminal benefits.

ii. PSPCL further submitted that as decided by the Appellate Tribunal *vide* its judgment dated 29/04/2022, the PSERC MYT Regulations which follow the principle of '*pay as you go*' with regard to unfunded past liabilities of pension and gratuity, have to be amended first. Relevant para of the judgment dated 29/04/2022 is mentioned as under:

> *"234. The Regulations notified by the State Commission shall have to be notified consistent with the Transfer Scheme as any power vested therein to the State Government cannot be restricted by the Regulations notified by the State Commission."*

iii. PSPCL stated that until and unless the current MYT Tariff Regulations 2022 is amended or there is an in-principle approval from this Hon'ble Commission regarding allowing contributions made towards it as an expense in the ARR, it cannot go ahead with operationalizing the same.

Commission's Analysis:

iv. The O&M expenses of which past liability is a part is worked out as per Regulation 24 note 9 as reproduced below:

> *"Note 9: With regard to unfunded past liabilities of pension and gratuity, the Commission will follow the principle of 'pay as you go'. The Commission shall not allow any other amount towards creating a fund for meeting unfunded past liability of pension and gratuity."*

v. The Commission has correctly disallowed progressive funding of the Terminal Benefit Trust stating that PSPCL has not operationalized the pension trust and has not made any provision for progressive funding of terminal benefits. Moreover this issue of progressive funding of the pension trust has not been claimed by PSPCL in this Tariff order.

vi. As such the prayer for review of the earlier Order on this issue is denied.

vii. PSPCL has also filed Appeal no 403 of 2024 (DFR no 369 of 2024) in APTEL against PSERC order dated 06.06.2024 in Review Petition no. 04 of 2023 in Petition no 74 of 2022 on same issue which is not yet decided.

H. NORMS OF OPERATION OF OWN THERMAL PLANTS

PSPCL's submission:

The Commission has considered normative values of Station Heat Rate, oil consumption, and auxiliary consumption of GGSSTP, Ropar, and GHTP Lehra Mohabbat while truing up for FY 2021-22, reviewing the performance of FY 2022-23 and determining ARR for the 3rd Control Period from FY 2023-24 to FY 2025-26. The submissions with respect to consideration of actual/relaxation in norms for each parameter for each plant are as under:

i. The operating parameters like consumption of coal, oil & auxiliary power and Station Heat Rate are affected adversely owing to various reasons *inter alia* operation of the thermal plants at part load & frequent unit start/stops. Running of plants is regulated by Power controller, Patiala to maintain the required system frequency according to demand. The impact is evident from the following table:

GGSSTP:

Year	2017-18	2018-19	2019-20	2020-21	2021-22
PLF (%)	22.45	23.50	14.25	12.01	23.57
No. of (start + stop) on no demand	55	38	88	78	97
Backdown (MU)	7542.49	5284.29	5650.69	6128.07	4875.46

GHTP

Year	2017-18	2018-19	2019-20	2020-21	2021-22
PLF (%)	36.54	30.84	11.33	11.24	24.91
No. of (start + stop) on no demand	50+47	59+58	26+27	29+29	41+38
Backdown (MU)	4888.343	4777.717	7002.257	6969.074	4620.923

ii. The effect of part load running and frequent unit start/stop on various parameters viz Station Heat Rate, Specific Oil Consumption and auxiliary Consumption is as detailed below:

a) **<u>Station Heat Rate (SHR)</u> –**The Commission has allowed SHR of 2430 kCal/kWh for GGSTP & GHTP Unit 1 to 3and 2387kCal/kWh for GHTP Unit 4. During FY 2023-24, reserve outage remained 21.50%& 19.10%, planned outage at 8.20%& 1.71% and actual SHR remained 2829 kCal/kWh & 2561kCal/kWh for GGSSTP& GHTP respectively**.** The SHR gets badly affected due to the following reasons:

i) **Ageing of Units** –

GGSSTP Units III and IV are approximately 36 years old, while Units V and VI are around 32 years old since commissioning, whereas GHTP Units are comparatively younger than GGSSTP Units. It is a universally acknowledged fact that the performance of any mechanical equipment does not remain consistent over the usable life of the equipment due to wear and tear during normal operations. The main equipment at GGSSTP & GHTP is of BHEL design and make. BHEL acknowledges the variation in the heat rate of the turbine due to ageing as specified in its Performance Guarantee Test Report. On the basis of this report, the deterioration of SHR as on 31.03.2024 is as under:

Table 13: Details of SHR for GGSSTP

S. No.	Unit	UoM	U-3	U-4	U-5	U-6
1	Date of Commissioning	-	31-03-88	29-01-89	29-03-92	30-03-93
2	Date of Commercial run	-	25-09-88	01-08-89	29-09-92	14-12-93
3	Design Turbine Heat rate	kCal/kWh	1985.00	1985.00	1985.00	1985.00
4	Design Boiler efficiency	%	88.18	88.18	88.10	88.10
5	Design Unit heat rate	kCal/kWh	2251.08	2251.08	2253.12	2253.12
6	No. of months after commissioning	Nos.	432	423	384	372
7	Total ageing tolerance	%	26.00	25.46	23.12	22.40
8	Heat Rate of unit calculated after ageing tolerance	kCal/kWh	2836.36	2824.20	2774.04	2757.82
9	**Average Heat Rate**	**kCal/kWh**	**2798.11**			

Table 14: Details of SHR for GHTP

S. No.	Unit	UoM	U-1	U-2	U-3	U-4
1	Date of Commissioning of units	-	08-07-98	06-12-98	27-02-08	13-11-08
2	Date of Commercial run	-	26-06-99	04-01-99	16-10-08	25-01-10
3	Design Turbine Heat rate	kCal/kWh	1985.00	1985.00	1951.00	1951.00
4	Design Boiler efficiency	%	88.65	88.65	88.35	88.35
5	Design Unit heat rate	kCal/kWh	2272.00	2272.00	2241.00	2241.00
6	No. of months after commissioning	Nos.	308	303	193	184
7	Total ageing tolerance	%	18.76	18.46	11.86	11.32
8	Heat Rate of unit calculated after ageing tolerance	kCal/kWh	2698.23	2691.41	2506.78	2494.68
9	Average Heat Rate	kCal/kWh	**2589.34**			

PSPCL further submitted that the primary factors involved in ageing are:

- Salt deposition on blades.
- Deterioration of surface finish of blades.
- Increase in the clearances in the blading flow path.
- Deposits in Heat Transfer Areas.
- Increase in losses of valves seats

It is pertinent to mention that many times during backing down the units have to run at a load as low as 150 MW and at this level of partial load operation the heat rate deteriorates further. No major R&M has been carried out so far at GGSSTP and GHTP.

ii. Partial load operation of the units and number of start/stop of units

The performance of GGSSTP and GHTP units for the last 5 years indicates a very low PLF mainly due to the PPA's with large-capacity IPP's in Punjab resulting in lesser share of PSPCL's own thermal plants. Further, the demand curve of Punjab is bell shaped which means that peak requirements occur in the middle of the year. GGSSTP and GHTP are scheduled during peak paddy season period. For the rest of the year, these plants are kept as back up since these fall at the higher side of the Merit Order. With the operation of these plants at a low PLF, it is almost impossible to meet with the approved heat rate norms which are very stringent.

Further, the accurate calculation of heat rates separately for Unit-1 to 3 and Unit-4 is not possible due to the reason that some amount of energy is consumed commonly for all the Units, such as FO tank heating, PRDS charging, running of Circulating Water Pumps etc.

Therefore, it would be better if a single value of SHR is approved for the station as a whole.

The Commission has fixed norms as per the Central Commission' tariff regulations, but in other states relaxation is given in SHR due to similar factors affecting their power stations as under:

Table 15: Station Heat Rate of Thermal Plants in other States

Name of State Thermal Plant	Station Heat Rate (kCal/kWh)
KTPS (Units 1 to 7) 110/210/195 MW	2561.70- Approved for 2022-23 by Rajasthan Tariff Order 2022-23
Ukai (Units 3 – 5) 200/210 MW	2625 - Approved for 2021-22 by Gujarat Tariff Order 2021-22
Gandhinagar (3-5) 210 MW	2625- Approved for 2021-22 by Gujarat Tariff Order 2021-22

b) **Secondary Fuel Oil Consumption-**The Commission has approved the specific oil consumption as 0.5 ml/kWh for GHTP and GGSSTP. Oil is primarily consumed for unit start-ups and for maintaining flame stability during partial load operations or in the event of issues like poor coal quality or equipment failures. The amount of oil consumed is directly related to the frequency of unit start-ups and stoppages. For GGSSTP approved specific oil consumption has never been achieved even when its PLF was higher in the past. Further, during FY 2023-24, GGSSTP and GHTP units have been synchronized 45 times and 71 times respectively due to low system demand which has contributed to higher oil consumption.

i) The Commission has fixed norms as per the Central Commission' tariff regulations but in other states relaxation is given in oil consumption due to the above said factors as shown below:

Table 16: Oil Consumption of Thermal Power Plants in other States

Name of State Thermal Plant	Oil consumption (ml/kWh)
Ukai (Units 3 - 5) 200/210 MW	1.00 - Approved for 2021-22 by Rajasthan Tariff Order 2022-23
Gandhinagar (3-5) 210 MW	1.00 - Approved for 2021-22 by Rajasthan Tariff Order 2021-22
PTPS 210 MW	1.00 - Approved for 2022-23 by Haryana Tariff Order 2022-23

In view of the above, PSPCL has requested the Commission to fix a higher specific oil consumption rate by giving due consideration to the above specified reasons.

c) **Auxiliary Power Consumption (APC) -**The Commission has approved the auxiliary power consumption as 8.5% for GHTP and GGSSTP. In the event of backing down generation, even though the load is reduced, the units operate at partial load and still requires power to run the minimum essential standby auxiliaries to safeguard the main equipment of the station. Consequently, the APC percentage is higher during low-load operations.

PSPCL is responsible for meeting the diverse demand (approx. 7,000 MW – 14,300 MW) of electricity in Punjab, which it does from different sources. The major sources from which PSPCL procures power are:

- Central Generating Stations
- Own Thermal and Hydel Generating Stations
- IPP‘s
- Co-Generation Plants
- Banking Arrangements
- Traders

i) According to Merit Order Dispatch, power is purchased from the above sources & also from the PPAs signed with IPP’s in Punjab for cost-effective and economic viability of PSPCL and efficient delivery of service to its consumers. This strategy often leads to the backing down of PSPCL's own generating stations which leads to higher operating parameters. However, when the plant operates at more than 80% PLF, its operational parameters improve significantly as depicted below:

Table 17: Operational Parameters at more than 80% PLF

S. No.	Operating Parameters	Unit	Year			
	GGSSTP		2009-10	2010-11	2011-12	2012-13
1	Plant load factor	%	91.11	88.04	86.41	83.05
2	Auxiliary Consumption	%	8.14	8.11	8.44	8.37
3	Specific overall oil consumption	ml/kWh	0.665	0.649	0.648	0.625
4	Heat Rate (GCV based)	kCal/kWh	2645	2566	2564	2538
	GHTP					
S. No.	Operating Parameters	Unit	Year			
			2010-11	2011-12	2012-13	2013-14
1	Plant load factor	%	84.79	94.31	89.53	82.70
2	Auxiliary Consumption	%	8.08	7.87	7.93	8.21
3	Specific overall oil consumption	ml/kWh	0.580	0.369	0.270	0.325
4	Heat Rate (GCV based)	kCal/kWh	2417	2402	2324	2396

ii) From the above table, it is clear that even when GGSSTP units have a higher PLF, even then the performance parameters fixed by the Commission would not be achievable. For GHTP, if the PLF was higher, then the parameters fixed by the Commission would be achievable. The Commission fixes unachievable norms for performance parameters like Generation, SHR, Auxiliary Consumption and Specific Oil Consumption whereas norms for performance should be based on the national average rather than be based on the top performers.

iii) PSPCL has submitted that unlike Section 63 projects, PSPCL generating stations are covered under the Section 62 regime. Accordingly, in terms of the provisions of the Electricity Act, 2003, PSPCL has requested the Commission to invoke its Power to Remove Difficulties and accordingly decide the issue. Such a dispensation may only be available with the Commission while determining tariff under Section 62.

iv) The Commission has fixed norms for SHR based on the Central Commission's tariff regulations. However, other states have provided relaxations for SHR due to similar factors affecting their power stations as under:

Table 18: Auxiliary Consumption of Thermal Plants in other States

Name of State Thermal Plant	Auxiliary consumption (%)
Ukai (Units 3 - 5) 200/210 MW	**9.00%** - Approved for 2021-22 by Gujarat Tariff Order 2021-22
Gandhinagar (3-5) 210 MW	**9.00%** - Approved for 2021-22 by Gujarat Tariff Order 2021-22
PTPS 210 MW	**9.00%** - Approved for 2022-23 by Haryana Tariff Order 2022-23
KTPS (Units 1 to 7) 110/210/195 MW	**9.65%** - Approved for 2022-23 by Rajasthan Tariff Order 2022-23
STPS (Units 1 to 6) 250 MW	**9.80%** - Approved for 2022-23 by Rajasthan Tariff Order 2022-23

Upon perusal of PSPCL's submissions, the Commission directed PSPCL to provide the following information with regards to Station heat Rate vide order dated 20.09.2024:-

- The heat rate calculations submitted by PSPCL are based upon Performance Guarantee Test conducted by OEM (BHEL) after commissioning of the units but PSPCL carries out the capital maintenance of the turbines after prescribed time period wherein the factors submitted by PSPCL for deterioration of heat rate may be taken care of and rectified thereby restoring the heat rate to a large extent (nearer to prescribed). PSPCL to explain the same.

- PSPCL had projected heat rate of 2666 kCal/kWh and 2500 kCal/kWh for FY 2024-25 in respect of GGSSTP and GHTP respectively in the ARR petition (G-24 format) for which PSPCL must have considered all factors i.e. lower PLF, ageing, start/stops and backdown etc. Here, PSPCL has calculated heat rate for GGSSTP as 2798 kCal/kWh and for GHTP as 2589 kCal/kWh on the basis of ageing alone. Thus, PSPCL's submission in this Review petition is not in consonance with its own submission in the ARR petition. PSPCL to explain the same.

In reply to the query of the Commission, PSPCL vide letter dated 08.11.2024 submitted as under:-

Station Heat Rate is badly affected due to the ageing of the units, partial load - operation of the units and a large number of start/stop of these units. The heat rate losses due to start/stop and partial load operation of units are not easily quantifiable. The maintenance of turbine is being carried out as per BHEL schedule after completion of the required equivalent running hours. Regarding the ageing factors affecting the turbine performance, the deposit in Heat Transfer Areas are being attended/checked after a span of 2 years (after about 17,000 equivalent running hours) whereas salt deposition on blades, deterioration of surface finish of blades, increase in the clearances in the blading/steam flow path and increase in losses of valve seats can only be checked/attended during capital overhauling of turbines [Module wise HPT/IPT /LPT) which is carried out after about 50,000 equivalent running hours. Further, running hours of all modules of the turbine is not happening at the same time. As such, their capital overhauling is carried out in a staggered way over a period of time according to the completion of equivalent running hours of the concerned unit. So, irrespective of the maintenance of equipment, some unit-wise efficiency loss is always there which affects the Station Heat Rate.

By considering the ageing factors of each turbine, the heat rate value deterioration as per BHEL PG Test Report may be up to 2798 kCal/kWh for GGSSTP and 2589 kCal/kWh for GHTP. Whereas the value of 2666 kCal/kWh for GGSSTP & 2500 kCal/kWh for GHTP had been projected keeping in view the anticipated improvement to be achieved by putting all possible efforts in the plant maintenance and operation.

Commission’s Analysis:

This petition is a review of PSPCL Tariff Order for FY 2024-25 wherein PSPCL has reiterated most of the comments submitted in the Review petition filed in respect of the Tariff Order for FY 2023-24. PSPCL has not even changed the year of the true up, review or ARR while submitting the review petition for Tariff Order for the FY 2024-25. All the issues raised by PSPCL regarding allowing a higher heat rate, higher oil/auxiliary consumption citing a lower PLF, ageing, more start/stops and more backdown already stands decided in the Commission’s Order dated 06.06.2024 in RP No. 04 of 2023 in Petition No. 74 of 2022.

Additionally, PSPCL has submitted that BHEL (OEM) acknowledges the variation in the heat rate of the turbine due to ageing as specified in its Performance Guarantee Test Report and has calculated the deterioration of the heat rate for GGSSTP to 2798kCal/kWh and 2589 kCal/kWh for GHTP based on the PG test report. PSPCL has further submitted that deterioration is due to Salt deposition on blades, Deterioration of surface finish of blades, increase in the clearances in the blading flow path, deposits in Heat Transfer Areas and increase in losses of valves seats.

The Commission has noted PSPCL's reply wherein PSPCL has submitted that the factors listed for deterioration of heat rate are attended to during the capital overhauling of the turbines. Such capital overhauling is carried out in a staggered way over a period of time according to completion of running hours of the turbines. Accordingly, the contention of the PSPCL that Station Heat Rate is continuously deteriorating as per ageing of the turbines is a contradiction with its own statements and thus does not qualify for the consideration of the Commission. Also, the Commission has allowed heat rate as per prescribed CERC norm in line with Regulation 34 of the PSERC MYT Regulations, 2022 wherein the units commissioned before 01.04.2009 have been allocated a higher normative heat rate than the designed heat rate.

Keeping in view of the above, the prayer with regard to review of the earlier Order on issue of Norms of Operation of its own Thermal Plants as requested by PSPCL is not tenable.

3. TARIFF RELATED ISSUES

PSPCL has raised the following Tariff Related Issues in this Review Petition.

i. Time of Day (ToD) Rebate during Night Hours for the Months of April & May

PSPCL has requested the Commission to discontinue ToD rebate of Rs. 0.75/kVAh during the period 1st April to 31st May.

ii. Time of Day (ToD) period of '16th June to 15th October'

PSPCL has requested the Commission to increase ToD surcharge during the period from 1st June to 15th October from Rs. 2.00/kVAh to Rs. 2.50/kVAh.

iii. New Time of Day (ToD) period from 1st December to 28th February with morning peak hours (6 am to 9 am)

PSPCL has requested the Commission to introduce surcharge of Rs. 2.50/kVAh over the normal tariff from 6:00AM to 9:00AM during December to February

iv. Revision of sanctioned load based on MDI for DS & NRS consumers

PSPCL has requested the revision of sanctioned load for DS/NRS as per maximum demand readings

v. Rationalisation of NRS Tariff

PSPCL has requested that tariff slabs of commercial consumers may be rationalized and simplified by introducing a single energy charge for all consumers and fixed charges may be charged as per the existing load-based categorisation.

vi. Review of tariff applicable to 'Compost/Solid Waste Management Plants for Municipalities of Urban Local Bodies &Water Supply Schemes' consumers.

The tariff for 'Compost/Solid Waste Management Plants for Municipalities of Urban Local Bodies & Water Supply Schemes' is mentioned as Rs 5.30/kVAh. As per the General Conditions of Tariff, the cumulative effect of ToD rebate on the energy charges at any time shall be limited to the Energy Charges of Rs. 5.31/kVAh. Logically, the minimum charges should be less than the category tariffs but in this case of Rural/Urban water supply schemes the normal rate to be charged is Rs. 5.30/ unit which is less than the minimum rate of Rs. 5.31/unit. Further, ToD Rebate is also admissible to such consumers as per the Tariff Order. Therefore, the tariff applicable to this consumer category may be reviewed keeping in view the ToD rebate admissible to such consumers.

Commission's Analysis:

Tariff related issues:

vii. The Commission has already deliberated all the issues (except 4&6) in the Chapter-5 of Tariff Order for FY 2024-25. However, the same shall also be reviewed in the next Tariff Order for FY 2025-26.

Regarding issue No. 4, the Commission has already considered the issue of revision of sanctioned load of DS/NRS consumers based on MDI in the Supply Code 2024 notified by the Commission on 23.10.2024.

Regarding issue No. 06, it is clarified that the energy charges for 'Compost/ Solid Waste Management Plants for Municipalities of Urban Local Bodies & Water Supply Schemes' have been prescribed as Rs. 5.30/kVAH which shall be limiting value of energy charges while considering the cumulative effect of ToD rebate on the energy charges. As such, the tariff applicable as per Tariff Order is Rs. 5.30/kWh and does not require any review and is in Order. Further, the Commission shall remove this anomaly in the Tariff Order for FY 2025-26.

The Review Petition is disposed of accordingly.

Sd/-	Sd/-
(Paramjeet Singh)	(Viswajeet Khanna)
Member	Chairperson

Chandigarh
Dated: 12.12.2024