



ORDER

OF THE

WEST BENGAL ELECTRICITY REGULATORY COMMISSION

IN CASES NO.

FPPCA-101(A)/21-22 (PART-I) AND

APR-86/21-22 (PART-I)

IN REGARD TO THE APPLICATIONS SUBMITTED BY DURGAPUR PROJECTS LIMITED FOR APPROVAL OF FUEL & POWER PURCHASE COST ADJUSTMENT (FPPCA) AND ANNUAL PERFORMANCE REVIEW (APR) FOR FY 2018-19 [UPTO 31.12.2018 (PART-I)]

PRESENT:

DR. MALLELA VENKATESWARA RAO, CHAIRPERSON

SRI PULAK KUMAR TEWARI, MEMBER

DATE: 02.07.2024



CHAPTER – 1 PREAMBLE

- 1.1. The Durgapur Projects Limited (DPL) was a sanction holder under Section 28 of the Indian Electricity Act, 1910 and has become a deemed licensee in terms of the first proviso to Section 14 of the Electricity Act, 2003 (hereinafter referred to as “the Act”) with effect from 10.06.2003 i.e., the date of coming into force of the Act, for distribution of electricity in Durgapur area of West Bengal.
- 1.2. In terms of the Notification No. 328/PO/O/C-IV/1E-60/13(Part-VA) dated 26.12.2018, the Government of West Bengal (GoWB) notified that with effect from 01.01.2019, the entire distribution and transmission businesses and activities under DPL along with all associated assets and liabilities will be transferred to the West Bengal State Electricity Distribution Company Limited (WBSEDCL) and the West Bengal State Electricity Transmission Company Limited (WBSETCL) respectively. Subsequently, in terms of Notification no. 332-PO/O/C-IV/IE-60/13(Part-VA) dated 31.12.2018 issued by GoWB in exercise of its power conferred under Section 108 of the Act, the Commission issued the following Order vide Case No. A-6/14 dated 31.12.2018:
 - a) WBSEDCL is allowed to take over the entire business of distribution of electricity of DPL along with all associated assets and liabilities and undertake distribution functions within the licensed area of DPL with effect from 01.01.2019.
 - b) WBSETCL is allowed to take over the entire business of transmission of electricity of DPL along with all associated assets and liabilities and undertake transmission functions within the licensed area of DPL with effect from 01.01.2019.
- 1.3. In view of the above notifications of GoWB and the Order of the Commission, DPL, a distribution licensee with embedded thermal generating station, became a generating company since 01.01.2019.
- 1.4. The Commission vide its Orders dated 11.10.2020 and 13.11.2020 determined the tariff for FY 2018-19 in two parts viz., Part-I and Part-II covering the periods from 01.04.2018 to 31.12.2018 and 01.01.2019 to 31.03.2019 considering DPL as distribution licensee and generating station respectively.
- 1.5. In terms of the provisions contained in Regulation 2.6 of the West Bengal Electricity Regulatory Commission (Terms and Conditions of Tariff) Regulations, 2011 as amended from time to time (hereinafter referred to as “Tariff Regulations”), the generating companies or the licensees, as the case may be, are subject to an Annual Performance Review (APR) process. DPL submitted



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

the Petition for APR for FY 2018-19 in two parts viz., Part I and Part II covering the periods from 01.04.2018 to 31.12.2018 and 01.01.2019 to 31.03.2019 considering DPL as distribution licensee and generating station respectively in terms of the provisions contained in the Tariff Regulations. DPL has also submitted the Fuel and Power Purchase Cost Adjustment (FPPCA) Petition for FY 2018-19 in two parts viz., Part I and Part II covering the periods from 01.04.2018 to 31.12.2018 and 01.01.2019 to 31.03.2019 considering DPL as distribution licensee and generating station respectively in terms of the provisions contained in the Tariff Regulations separately. The Commission had admitted the FPPCA and APR Petitions and numbered them as Case No FPPCA-101(A)/21-22 (Part-I) and Case No. APR-86/21-22 (Part-I) & FPPCA-101(A)/21-22 (Part-II) and Case No. APR-86/21-22 (Part-II) for Part-I & Part-II respectively. The instant Order shall contain Part-I only covering DPL as a distribution licensee. APR and FPPCA for Part-II as a generating station shall be determined under a separate Order.

- 1.6. The Annual Performance Review application on the basis of the audited annual report and accounts of DPL for FY 2018-19 (Part-I) with reference to the tariff order dated 11.10.2020 of West Bengal Electricity Regulatory Commission (in short 'Commission') in Case No. TP-87/19-20 will result into adjustment on different heads. The net adjustment arises out of such review on different heads will be considered for giving effect to while determining the amount of revenue adjustable through tariff order for further ensuing year or through separate order as specified in Regulation 2.6.6 of the Tariff Regulations.
- 1.7. The APR covers the areas of permissible annual fixed charges determination to the applicant, the effect of gain sharing and permissible incentives as per Schedule-9B and Schedule 10 to the Tariff Regulations respectively. In the APR for FY 2018-19 (Part-I), therefore, the review of the different elements of fixed charges, categorized as controllable and uncontrollable has been done to find out the amounts to be adjusted to DPL against each head of elements vis-à-vis the amount allowed under tariff order for FY 2018-19 (Part-I).
- 1.8. On admission of the APR and FPPCA Petitions, DPL was directed to publish the gist of the APR and FPPCA Petitions of FY 2018-19 (Part-I), as submitted by DPL and approved by the Commission. Accordingly, the gist was published on 06.04.2022 in the 'Times of India' and the 'Aajkaal' and on 08.04.2022 in the 'Sangbad Pratidin' and the 'Bartaman'. The publication requested for submission of suggestions and objections from the members, if any, on the application to the Commission within 21 days from the date of publication of gist. The approved gist along with the APR Petition for FY 2018-19 (Part-I) was also published on the website of DPL. Opportunities were also offered to all to inspect the application and take copies thereof.



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

- 1.9. Against such gist publications of APR and FPPCA of DPL for FY 2018-19 (Part-I), no objection and/or suggestion have been received from any person within last date of submission.
- 1.10. During the course of analysis, the Commission has found certain deficiencies and accordingly sought clarifications/additional information from DPL. DPL has submitted some of the clarifications/additional information sought by the Commission.
- 1.11. Regulation 2.6.5 of the Tariff Regulations specifies as under:

“During any Annual Performance Review, the Commission shall also determine under the order of the APR, the amount to be adjusted with the ARR of any ensuing year(s) for which tariff order is going to be issued. Determination of such adjustable amounts under APR order shall be based on the following factors:

(i) For Licensee

(a) the difference between x and y i.e., $(x-y)$

where,

x = revenue recovered as per the tariff order and as per the order for any Adhoc Power Purchase Cost / Adhoc Variable Cost / Monthly Fuel Cost / Monthly Variable Cost of the year for which APR is undertaken,

and

y = the corresponding admissible amount of fixed costs as determined for the year for which APR is undertaken and variable cost as per FPPCA order, if any, for the year under APR (While determining the admissible amount of Fixed Cost the Commission shall take into account the actual expenditure/entitlement of different elements of fixed cost on which the Commission will have prudence check to determine the admissible amount).

(b) the admissible incentives as per Schedule-10 for the year under APR after taking into consideration of the actual performance.

(c) extent of gain sharing as per Schedule-9B for the year under APR for the parameters which are not covered under Fuel and Power Purchase Cost determination under FPPCA after taking into consideration of the actual performance.”

- 1.12. The submissions of DPL and Commission's analysis on APR and FPPCA for FY 2018-19 (Part-I) are detailed in the following chapters.



CHAPTER – 2 COMPUTATIONS OF THE ALLOWABLE FUEL AND POWER PURCHASE COST

- 2.1. In this part of the order, the Commission takes up for determination of fuel and power purchase cost allowable to DPL on the quantum of power generated, purchased and sold by it to the consumers and other licensees during FY 2018-19 (upto 31.12.2018) considering the allowable normative parameters.
- 2.2. DPL is a multi-unit company fully owned by GoWB. DPL was a distribution licensee under the Act having embedded generation station during FY 2018-19 till 31.12.2018. Besides functioning as a distribution licensee, DPL has a coke oven plant, coal washery and water treatment plant. Part of the generation of electricity at the generation station is being utilized by other sister units and such energy is treated as inter-plant transfer on cost recoverable basis.
- 2.3. DPL submitted that it had been submitting the FPPCA applications station wise and the same were being admitted by the Commission. DPL submitted that the FPPCA Order for FY 2015-16 dated 25.07.2022 has also been issued based on overall station of DPL.
- 2.4. DPL submitted that Note (ii) of Clause A of Schedule-9A of the Tariff Regulations specifies as under:

“The gross station heat rate of any coal fired thermal generating station shall always be computed on the basis of generating station as a whole without any special consideration being given to the possible impact of any individual unit on the plant except when there is an outage of any unit over three months or more at a stretch, or there is a time overrun of new proposed unit.”

DPL submitted that its FPPCA application for FY 2018-19 (upto 31.12.2018) is in line with the Tariff Regulations.

2.5. Sale volume of electricity

- 2.5.1. The Commission in the Tariff Order had approved the sale to consumers, inter plant transfers, and sales to WBSEDCL as 1777.17 MU. As against the same, DPL has claimed 1779.73 MU including the sale in IEX.

**Table 2-1: Sale volume of electricity for FY 2018-19 in MU (upto 31.12.2018)**

Sl. No.	Particulars	Approved in Tariff Order	Actual claimed (as per Annexure 4)
A	Sale to own consumers		
	L&MV sale	104.18	104.79
	11 kV	519.98	519.91
	33 kV	504.21	504.98
	132 kV	385.38	385.74
	Sub-total (A)	1513.75	1515.41
B	Inter Plant transfer	8.59	8.59
C	Sale to WBSEDCL		
	at 11 kV	3.10	3.09
	at 33 kV	49.42	49.42
	at 132 kV	202.31	202.31
	Sub-total (C)	254.83	254.82
D	IEX sale	0.00	0.90
	Total (A+B+C+D)	1777.17	1779.73

2.5.2. Regulation 2.5.5(iii) of the Tariff Regulations characterize sale volume of electricity as an uncontrollable factor. The claimed figures of actual sales are in line with the figures as per the audited accounts and hence the Commission admits the same.

2.6. Own consumption

2.6.1. The Commission in the Tariff Order had approved the own consumption as 9.00 MU. As against the same, DPL has claimed the own consumption of 11.25 MU. Accordingly, the Commission admits the own consumption as claimed by DPL.

2.7. Sourcing of energy for Distribution

2.7.1. The entire energy requirement of DPL for distribution including inter-plant transfer generally is met from its own generating stations. Part of the ex-bus generation, remaining surplus after meeting the demand of its licensed area and inter-plant transfer is sold to WBSEDCL. However, if own generation of DPL during a period is found inadequate, energy is sourced from WBSEDCL or elsewhere.

2.7.2. The Commission in the Tariff Order had approved the gross generation from Units VII&VIII as 1772.664 MU. The Commission had approved the ex-bus generation of 1616.164 MU on the basis of the norms of auxiliary consumption for Units VII&VIII as specified in the Tariff Regulations. As against the same, DPL has claimed the Net ex-bus generation of 1578.09 MU



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

in FPPCA petition but 1586.51 MU in Form 1.11 of the APR petition. However, the Commission observed that DPL in Annexure – A of FPPCA application has submitted the auxiliary consumption as 186.15 MU. Besides, DPL has considered 8.42 MU as transformation loss to arrive at the Net ex-bus generation available for sale to consumers and licensee at 1578.09. Accordingly, the Commission has considered total sent out generation as 1578.09 MU (1772.66 MU – 186.15 MU – 8.42 MU). Since DPL has not provided unit wise net sent out generation after transformation loss, the Commission for the purpose of computation of fuel cost, has derived the same by proportionating as per unit wise ex bus generation before transformation loss as shown below:

Unit wise Net sent out generation after transformation loss

Sl. No.	Particulars	Unit	Total Upto 31.12.2018	U#7	U#8
A	Gross Generation (Actual)	MU	1772.664	607.952	1164.712
B	Auxiliary Consumption without Transformation loss [Form 1.11]	MU	186.150	80.731	105.419
C	Ex Bus generation (before Transformation loss as per Form 1.11)	MU	1586.514	527.221	1059.293
D	Auxiliary Consumption including Transformation loss [FPPCA petition]	MU	194.57		194.57
E	Ex Bus generation (after Transformation loss)	MU	1578.09	524.42	1053.67
F	Auxiliary Consumption including Transformation loss [(A-E)/A]	%	10.98%	13.74%	9.53%

2.7.3. The Commission in the Tariff Order had approved the power purchase of 253.53 MU. As against the same, DPL has claimed the actual power purchase of 233.06 MU.

2.8. Energy Balance

2.8.1. Based on the foregoing discussion and the statement of sale submitted by DPL with auditor's certificate, the energy balance for FY 2018-19 (upto 31.12.2018) is as shown in the Table below:

**Table 2-2: Energy balance for FY 2018-19 (upto 31.12.2018)
(MU)**

Sl. No.	Particulars	Approved in Tariff Order	Claimed	Admitted
Supply Side				
1	Gross Generation	1772.66	1772.66	1772.66
2 (a)	Auxiliary consumption	156.50	186.15	186.15
2(b)	Transformation loss		8.42	8.42
3	Net ex-bus Generation available for sale (1-2)	1616.16	1578.09	1578.09
4	Energy from Solar PV project of DPL-WBREDA	0.18	0.18	0.18
5	Total available from own generation (3+4)	1616.34	1578.27	1578.27
6	Purchase during the year			
	WBSEDCL		64.73	64.73
	SIPL		4.60	4.60
	IEX	253.53	132.94	132.94
	UI		30.79	30.79
	Sub-total (6)	253.53	233.06	233.06
7	Gross energy in the system (5+6)	1869.87	1811.33	1811.33
Utilisation Side				
8	Supply to WBSEDCL at 220/132/33 kV	251.73	242.01	251.73
9	Sale to IEX	0.00	0.90	0.90
10	Net energy in the system for distribution area (7-8-9)	1618.14	1568.42	1558.70
11	Inter Plant Transfer	8.59	8.59	8.59
12	Consumption at own premises	9.00	11.25	11.25
13	Sale to Consumers including sale to WBSEDCL at 11 kV	1516.85	1528.23	1518.51
14	Distribution Loss (10-11-12-13)	83.70	20.35	20.35
15	Distribution Loss in % (14÷10)	5.20%	1.30%	1.31%
16	Total Utilisation (8+9+11+12+13+14)	1869.87	1811.33	1811.33

2.8.2. As against the normative distribution loss of 5.20%, the claimed distribution loss is 1.30% and the actual distribution loss as admitted is 1.31%.

2.8.3. The aggregate of sale of electricity to own consumers, to WBSEDCL at 11 kV and consumption at own premises of DPL works out to 1529.76 MU. The actual distribution loss is 1.31% as against the normative loss of 5.20% and the savings on account of lower distribution



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

- loss works out to 63.67 MU. As provided in paragraph C of Schedule-9B of the Tariff Regulations, entitled gain in this regard is required to be shared with the consumers.
- 2.8.4. The amount of fuel and power purchase cost that can be allowed to DPL, after carrying out the adjustment towards gain sharing and accrual of benefits for savings in quantum of distribution loss is discussed in the subsequent paragraphs.
- 2.9. The Commission now proceeds to determine the fuel and power purchase costs allowable to DPL in terms of the formula specified in Schedule-7A of the Tariff Regulations.
- 2.10. The Fuel and Power Purchase Cost (FPPC) during the referred adjustment period i.e., FY 2018-19 (upto 31.12.2018), is to be admitted in terms of the formula as specified in Schedule-7A of the Tariff Regulations.
- 2.11. FPPCA formula provides for adjustment of allowable fuel and power purchase cost for gain sharing in accordance with Schedule-9B of the Tariff Regulations. Schedule-9B of the Tariff Regulations contains provisions for sharing the gains derived by the licensee, if any, on account of its better performances over the operating and fuel consumption norms set by the Commission for the concerned year. The operational parameters which are to be considered for such sharing of gains accrued to the licensees are:
- i) Oil consumption rate,
 - ii) Rate of Auxiliary Consumption,
 - iii) Gross Station Heat Rate.
- 2.12. The referred Schedule-9B also provides that in case of availability of a generating station of the licensee falls below the availability norm, then the total gains meant to be passed on to the consumers under the items (i) to (iii) above, is first to be used to compensate the deficit in the recovery of the fixed charges, if any, by the licensee.
- 2.13. In addition to above, Schedule-9B also provides for sharing of gains accruing to a distribution licensee on account of improvement in distribution loss than the normative loss with the consumers in the ratio of 75:25 through APR.
- 2.14. Before ascertaining the amount of admissible fuel and power purchase cost as well as the amount of gains if any to be shared with the consumers and other licensees under the provisions of the Tariff Regulations explained in earlier paragraphs, the actual performance of DPL is required to be viewed in comparison to the operational and fuel efficiency norms set by the Commission in the Tariff Order for the concerned year. Such comparisons are made in the subsequent paragraphs.



2.15. Fuel cost of own generation

2.15.1. The comparison of fuel consumption norms approved by the Commission and actual for FY 2018-19 (upto 31.12.2018) is as shown in the Table below:

Table 2-3: Norms of operation for FY 2018-19 (upto 31.12.2018)

Sl. No.	Particulars	Unit	Approved in Tariff Order			Actual		
			Unit VII	Unit VIII	Station	Unit VII	Unit VIII	Station
1	Station Heat Rate	kcal/kWh	2345.00	2425.00	2397.56	2367.36	2447.94	2420.31
2	Specific consumption oil	ml/kWh	1.00	1.00	1.00	1.40	0.58	0.86
3	Auxiliary consumption	%	8.50%	9.00%	8.83%	13.74%	9.53%	10.98%
4	Coal transit & handling loss	%	0.50%	0.50%	0.50%	0.60%	0.60%	0.60%

2.15.2. The computations of actual Station Heat Rate (SHR), specific oil consumption and auxiliary consumption are shown in Annexure-2A.

2.15.3. Fuel cost of own generation is to be allowed as per the normative parameters fixed by the Commission and heat value of coal as may be allowed under Regulation 5.8.1 of the Tariff Regulations, commensurate with the actual level of energy sales to own consumers and / or licensees during the adjustment period.

2.15.4. As seen from Table 2-3, DPL succeeded in performing better than the norms for oil consumption for the Unit No. 8 and station as a whole. Part of the benefits accrued to it in financial terms on account of the same is, therefore, to be passed on to its consumers and other licensees in terms of the provisions of Schedule-9B of the Tariff Regulations. The same has been discussed in detail in the subsequent paragraphs.

2.15.5. The consumption of fuel and costs thereon submitted by DPL is as shown in the Table below:

Table 2-4: Fuel and cost details submitted by DPL for FY 2018-19 (upto 31.12.2018)

Sl. No.	Particulars	Unit	Approved in Tariff Order			Claimed in FPPCA
			Unit VII	Unit VIII	Station	Station
1	SHR	kcal/kWh	2345.00	2425.00	2397.56	2381.00
2	Rate of Oil Consumption	ml/kWh	1.00	1.00	1.00	1.00
3	Weighted Average Calorific Value of Oil	kcal/lit	10799.00	10799.00	10799.00	9354.16
4	Weighted Average Heat Value of Coal	kcal/kg	3770.34	3770.34	3770.34	3544.94



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

Sl. No.	Particulars	Unit	Approved in Tariff Order			Claimed in FPPCA
			Unit VII	Unit VIII	Station	Station
5	Weighted Average Price of Oil	Rs./kL	47237.44	47237.44	47237.44	41306.59
6	Weighted Average Price of Coal	Rs./MT	3483.66	3483.66	3483.66	3496.78

2.15.6. The first two of the above factors, i.e., the station heat rate and the rate of consumption of oil are to be considered based on the norms specified by the Commission. The weighted average calorific value of oil and the weighted average heat value of coal are the variable factors depending upon the actual mix of different grades of fuel used in operation. The declared heat value of each grade of coal varies within a range. The weighted average heat value of coal is subject to adjustments in terms of Regulation 5.8.1(i) of the Tariff Regulations.

2.15.7. Generation

Gross generation of the station has been estimated by taking into consideration the net ex-bus injection and normative auxiliary consumption.

2.15.8. Auxiliary consumption

The quantum of auxiliary consumption at the generating station as per the norms fixed by the Commission is as under:

Table 2-5: Normative auxiliary consumption for FY 2018-19 (upto 31.12.2018)

Unit	Unit	Unit VII	Unit VIII	Total
Net Sent out Generation	MU	524.42	1053.67	1578.09
Normative Auxiliary Consumption	%	8.50%	9.00%	8.83%
Normative Auxiliary Consumption	MU	48.72	104.21	152.93
Admissible Gross Generation	MU	573.14	1157.88	1731.02

2.15.9. Weighted average GCV of oil

DPL has presented their detailed audited computations of the weighted average calorific value of oil with reference to the month-wise supplies received by them. As this is a variable factor depending on the grades of oil used, the Commission has considered the same for working out the amount of allowable fuel cost.

2.15.10. Heat Value of Coal

The Commission noted that DPL has determined weighted average UHV of different grades of coal consumed, certified by auditor, considering minimum UHV of the respective coal band with reference to specific mid-level 'GCV' of the respective grades of coal. The Commission



goes by the provisions of the regulation 5.8.15 of the Tariff Regulations for determination of UHV by the process of interpolation considering lowest GCV of respective grades of coal. Detailed computations are shown in Annexure-2B. The Heat Value ('X') so determined is 3380.20 kcal/kg. Since the submitted actual Heat Value of 3544.94 kcal/kg is more than the determined heat value ('X'), the actual heat value (UHV) has been considered in terms of regulation 5.8.1(i) of the Tariff Regulations in Fuel cost determination.

2.15.11. Permitted transit and handling loss of coal

DPL has claimed 0.60% transit loss on entire coal. The Commission has considered the transit loss of 0.5% in line with the Tariff Regulations for the purpose of this Order.

2.15.12. Average price of oil and coal

The Commission observes that DPL has purchased coal from CIL subsidiaries and through WBMDTCL. DPL has submitted the actual fuel price along with the auditor certificate and also provided the break-up of coal prices. The domestic coal prices are as per the basic price of coal as notified by CIL along with royalty, taxes and duties.

The Commission in the Tariff Order ruled as under:

"4.10.6 The Commission observes that DPL has purchased 57646 MT of G-14 grade coal, which is about 4.85% of their total coal purchase during the year 2018-19 upto 31.12.2018. In terms of Tariff Regulation coal through e-auction could be purchased subject to satisfaction of conditions specified in regulation 5.8.2 of the Tariff Regulation. DPL in their petition did not clarify their position regarding conditions specified in regulation 5.8.2 of the Tariff Regulation. Thus, at this stage Commission does not admit such purchase of G14 grade of e-auction coal at much higher cost. DPL may put up their justification, if any, during FPPCA. Accordingly, the Commission based on submission in Forms D1, D2 and D3 and considering the provisions of Regulation 5.8.15 of the Tariff Regulations determines the weighted average useful heat value and price of coal..."

Regulation 5.8.2 of the Tariff Regulations specifies that the sourcing of coal besides linkage based allocation policy of Government of India, such as through e-auction or any other means of auction or any other mechanism from indigenous source shall be allowed by the Commission subject to satisfaction of any of the following conditions:

- (a) Coal price is less than the administered coal price of same grade available through linkage based allocated coal.



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

(b) it can be established that procurement of coal will be ultimately beneficial to the consumers of the State and for that purpose prior in principle clearance is obtained from the Commission.

(c) In power shortage scenario procurement of coal through such mechanism does not increase the fuel cost, as approved in ARR, by more than 10% provided that allocation of coal through linkage from concerned Ministry of Government of India is not sufficient to harness the total potentiality of available generation capacity and there is sufficient evidence of power shortage which is required to be submitted while claiming such coal price.

From the submissions of DPL, it has been observed that the price of coal sourced from WBMDTCL is lowest in comparison to prices of all the other sources of coal purchase and accordingly, such sourcing of coal from WBMDTCL satisfies the stipulation in Regulation 5.8.2(a) and is admissible.

The Commission observed that the coal price claimed by DPL is inclusive of coal handling charges. The coal handling charges have been dealt separately as part of fixed cost and hence, the same have not been considered in the fuel cost.

Regulation 5.8.1(vi) of the Tariff Regulations, 2011 specifies as under:

“Demurrage charge of railway rake, being commercial terms and conditions of freight, is also an indicator of efficiency of rake unloading capability of the generating stations. For existing power stations, allowance for the demurrage will gradually be reduced to a target in phased manner within a stipulated period as per regulation 2.8.6 as and when provided under. For new power stations or extension of existing power station commissioned after publication of these regulations it will be zero unless free time provided by railway is reduced by more than 20% from the existing value.”

The fuel prices have been considered as per Auditors Certificate after deducing demurrage charges from the coal price. The Commission has not allowed the demurrage charges in absence of any specific justification of such claim in terms of clause (vi) of Regulation 5.8.1 of the Tariff Regulations, 2011.

Table 2-6: Coal price admitted by the Commission (Rs./MT)

Particulars	Admitted by the Commission
Weighted average coal price claimed	3496.78
Less:	
Weighted average coal handling charges	42.85



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

Particulars	Admitted by the Commission
considered separately in fixed cost	
Demurrage charges disallowed	9.60
Weighted average coal price admitted	3444.33

2.15.13. Determination of allowable fuel cost

Based on the foregoing analysis, the fuel cost of own generation for FY 2018-19 (upto 31.12.2018) is as shown in the Table below:

Table 2-7: Fuel cost for FY 2018-19 (upto 31.12.2018)

Sl. No.	Particulars	Unit	Actual			Claimed in FPPCA Station	Approved		
			Unit VII	Unit VIII	Station		Unit VII	Unit VIII	Station
1	Ex-bus generation	MU	527.22	1059.29	1586.51	1578.09	524.42	1053.67	1578.09
2	Gross generation	MU	607.95	1164.71	1772.66	1733.21	573.14	1157.88	1731.02
3	Fuel cost	Rs. Lakh	14557.53	28513.62	43071.15	41465.85	13308.69	27791.29	41099.98
4	Energy charge	paise/kWh	276.12	269.18	271.48	262.76	253.78	263.76	260.44

The computations of fuel cost are shown in Annexure-2C.

2.16. Power Purchase Cost

2.16.1. The Commission, in the Tariff Order, had approved the power purchase cost of Rs. 11276.49 Lakh for the power purchase quantum of 253.53 MU. As against the same, DPL has claimed the power purchase cost of Rs. 10099.72 Lakh for the power purchase quantum of Rs. 233.06 MU. The claimed power purchase cost is as per the audited accounts.

Table 2-8: Power purchase cost claimed for FY 2018-19 (upto 31.12.2018)

Sl. No.	Particulars	Approved in Tariff Order			Claimed in FPPCA		
		Quantum (MU)	Cost (Rs. Lakh)	Per unit cost (Paise/kWh)	Quantum (MU)	Cost (Rs. Lakh)	Per unit cost (Paise/kWh)
1	SIPL (Solar)	4.60	721.86	1569.26	4.60	721.86	1569.26
2	WBSEDCL	248.93	10554.63	424.00	64.73	2940.73	454.31
3	IEX				132.94	5436.38	408.93
4	UI				30.79	996.88	323.77
5	Reactive Energy charge					3.87	
	Total	253.53	11276.49	444.78	233.06	10099.72	433.35

2.16.2. DPL drew 30.79 MU of power under Unscheduled Interchange (UI) as net drawal during FY 2018-19 (upto 31.12.2018). The payable amount against net drawal under UI mode was Rs. 996.88 Lakh. It is also seen that no amount was receivable under UI. The cost of power



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

purchase in UI mode in net drawal mode, should be restricted to 5% of overall power purchase cost from all other sources as per Regulation 5.17.2 of the Tariff Regulations. The claim of cost of power purchase in UI mode in net drawal mode is lower than the specified the ceiling limit of 5%. Thus, the cost of power purchase of Rs. 996.88 Lakh against net UI power drawal mode is admitted.

2.16.3. DPL claimed the cost of Rs. 3.87 Lakh towards reactive energy (VAR) charge. In line with the Commission order dated 21.07.2016 in Case No: SM -14/16-17, the Commission approves the Reactive Energy Charges claimed by the Petitioner.

2.17. Treatment of surplus sale

2.17.1. DPL has sold 0.90 MU of surplus power to IEX during FY 2018-19 (upto 31.12.2018). The Commission is of considered opinion that, primary responsibility of a distribution licensee is to supply power to its consumers from its own generating plants and/or from other sources through PPA on merit order basis. During the process of managing the load-generation balance, licensee may require to sale its incidental surplus power or arrange for banking, etc in such a way that ultimate consumers are get benefitted. The Commission decides to adjust the cost of sale of surplus power at the average variable cost of power purchase cost excluding Solar, exchange but including own generation of the licensee to ensure ultimate benefit of the end consumers as tabulated below.

Weighted Average Variable Cost

Sl. No.	Particulars	Amount
A	Normative Own Fuel Cost (Rs lakh) [As per Annexure 2C]	41099.98
B	Purchase other than RE, Exchange, short term (Rs lakh)	2940.73
C	Ex Bus own generation (MU)	1578.09
D	Purchase other than RE, Exchange, short term (MU)	64.73
E	Weighted Average variable cost (paise/kWh) $[(A+B)/(C+D)]$	268.08

Therefore, the cost of sale to others comes at Rs 24.13 lakh for 0.90 MU @ 268.08 P/kwh. Gain, if any, on account of revenue earned shall be shared in subsequent chapter in terms of clause (iv) of regulation 5.15.2 of the Tariff Regulations. Accordingly, the admissible power purchase cost for sale to consumers and WBSEDCL is worked out as below:



Table 2-9: Power purchase cost approved for FY 2018-19 (upto 31.12.2018)

Sl. No.	Particulars	Claimed in FPPCA			Approved		
		Quantum (MU)	Cost (Rs. Lakh)	Per unit cost (Paise/kWh)	Quantum (MU)	Cost (Rs. Lakh)	Per unit cost (Paise/kWh)
1	SIPL (Solar)	4.60	721.86	1569.26	4.60	721.86	1569.26
2	WBSEDCL	64.73	2940.73	454.31	64.73	2940.73	454.31
3	IEX	132.94	5436.38	408.93	132.94	5436.38	408.93
4	UI	30.79	996.88	323.77	30.79	996.88	323.77
5	VAR charge		3.87			3.87	
6	Less: Sale to Others				0.90	24.13	
	Total	233.06	10099.72	433.35	232.16	10075.59	433.99

2.18. Fuel and power purchase cost

2.18.1. In terms of the FPPCA formula specified in the Tariff Regulations, the admissible fuel and power purchase cost works out as under:

Table 2-10: Fuel and power purchase cost admissible for FY 2018-19 (upto 31.12.2018)

Sl. No.	Factor Notation	Nomenclature	Unit	Claimed	Approved
1	t	Norms of Transmission and Distribution loss considered for sale of power to licensee and for interplant transfer	%	0.00%	0.00%
2	d	Norms of distribution loss for sale to consumers	%	5.20%	5.20%
3	E ₀	Energy for own consumption (Refer Table 2-2)	MU	11.25	11.25
4	E _{SL}	Energy sale to licensee and interplant transfer (Refer Table 2-2)	MU	242.91	260.32
5	E _{SC}	Energy sale to consumer (Refer Table 2-2)	MU	1536.82	1518.51
6	Fuel Cost	Fuel cost for generation on normative parameters (Refer Table 2-7)	Rs. Lakh	41465.85	41099.98
7	FC _{IUC}	Per unit Fuel Cost at distribution input for sale to consumers (Refer Table 2-11)	Paise/kWh	228.95	227.04
8	FC _{Adm_d}	Admissible Fuel Cost for sale to WBSEDCL and inter plant transfer (Refer Table 2-12)	Rs. Lakh	5561.42	5910.31
9	FC _{Adm_C}	Admissible Fuel Cost for sale to consumer and for own consumption (Refer Table 2-13)	Rs. Lakh	37387.20	36636.77
10	FC	Admissible Fuel Cost (8+9)	Rs. Lakh	42948.62	42547.08
11	PPC	Power Purchase Cost including net UI charges (Refer Table 2-9)	Rs. Lakh	10099.72	10075.59
12	FC +PPC	Admissible Fuel and Power Purchase Cost (10+11)	Rs. Lakh	53048.34	52622.67



Table 2-11: Fuel cost per unit at distribution input

Sl. No.	Particulars	Unit	Claimed	Approved
1	Fuel cost for sale to consumers (Refer Table 2-7)	Rs. Lakh	41465.85	41099.98
2	Energy sent out from own generation for the consumers and licensee (Refer Table 2-2)	MU	1578.09	1578.09
3	Power Purchase (Refer Table 2-9)	MU	233.06	232.16
4	Total energy available for sale (2+3)	MU	1811.15	1810.25
5	$FC_{IUC} \times ((1+4) \times 10)$	Paise/kWh	228.95	227.04

Table 2-12: Fuel cost for sale to licensee

Sl. No.	Factor Notation	Nomenclature	Unit	Claimed	Approved
1	E_{SL}	Energy sale to licensee and interplant transfer (Refer Table 2-2)	MU	242.91	260.32
2	FC_{IUC}	Fuel Cost per unit at Distribution input (Refer Table 2-11)	Paise/kWh	228.95	227.04
3	t	Norms of Transmission and Distribution loss considered for sale of power to licensee and for interplant transfer	%	0.00%	0.00%
4	FC_{Adm_d}	Admissible Fuel Cost for sale to WBSEDCL and inter plant transfer $(E_{SL} \times FC_{IUC}) + ((1-t) \times 10)$	Rs. Lakh	5561.42	5910.31

Table 2-13: Fuel cost for sale to consumers

Sl. No.	Factor Notation	Nomenclature	Unit	Claimed	Approved
1	E_{SC}	Energy sale to consumer (Refer Table 2-2)	MU	1536.82	1518.51
2	E_O	Energy for own consumption (Refer Table 2-2)	MU	11.25	11.25
3	FC_{IUC}	Fuel Cost per unit at Distribution input (Refer Table 2-11)	Paise/kWh	228.95	227.04
4	d	Norms of distribution loss for sale to consumers	%	5.20%	5.20%
5	FC_{Adm_C}	Admissible Fuel Cost for sale to consumer and for own consumption $((E_{SC} + E_O) \times FC_{IUC}) + ((1-d) \times 10)$	Rs. Lakh	37387.20	36636.77

2.18.2. C_D : Cost disallowable

Factor C_D , as referred to in the FPPCA formula stands for cost as to found disallowable by the Commission as per methodology specified in the FPPCA formula as under:

**Table 2-14: Cost disallowable**

Sl. No.	Factor Notation	Nomenclature	Unit	Claimed	Approved
1	E _{SC}	Energy sale to consumer	MU	1536.82	1518.51
2	E _O	Energy for own consumption	MU	11.25	11.25
3	d	Norms of distribution loss for sale to consumers	%	5.20%	5.20%
4		$(((1)+(2))\div(1-(3)))$	MU	1632.99	1613.67
5	E _{SL}	Energy sale to licensee and interplant transfer	MU	242.91	260.32
6	t	Norms of Transmission and Distribution loss considered for sale of power to licensee and for interplant transfer	%	0.00%	0.00%
7		$[(5)\div(1-(6))]$	MU	242.91	260.32
8	E	Auxiliary consumption in excess of norm*	MU	35.92	0.00
9	E _g	Energy sent out from own generating station	MU	1578.09	1578.09
10	E _{Adm}	Purchase of energy admitted $[(4)+(7)-(8)-(9)]$	MU	261.89	295.90
11	E _P	Total energy purchased including UI [Table 2-9]	MU	233.06	232.16
12	E _E	Excess energy purchased $[(11)-(10)]$	MU	-28.83	0.00
13	EP _{Avg}	Average power purchase cost [Table 2-9]	Paise/kWh	433.35	433.99
14	C _D	Cost disallowable $[(12)\times(13)]$	Rs. Lakh	-1249.15	0.00

*Since the excess auxiliary energy consumption over the norms has already been disallowed while determining fuel cost on the basis of normative generation based on sent out generation thus further disallowance for excess auxiliary consumption has not been considered here

DPL has succeeded in achieving the distribution loss much below the norm approved for the year. Excess power purchase as per formula specified in Schedule-7A is found nil. Thus, no part of the fuel and power purchase cost is found disallowable and hence, value of factor C_D is nil. DPL has claimed additional cost under the factor C_D which is not allowable in accordance with the Regulations.

2.18.3. ±A: Prior period adjustments

Factor A in the referred FPPCA formula signifies the adjustment, if any, to be made in the current period to account for any excess / shortfall in the recovery of fuel and power purchase cost for the past period. DPL has not claimed any amount under this head. As per the financial statements for the year ended 31st March, 2019, it is observed that no income / expenditure has been accrued to DPL on account of purchase of power relating to prior period purchase.

2.18.4. Aggregate allowable fuel and power purchase cost

The aggregate amount of fuel and power purchase cost, commensurate with actual quantum of sale to consumers and to the licensee (WBSEDCL), that can be allowed to DPL is as under:

**Table 2-15: Aggregate amount of fuel and power purchase cost (Rs. Lakh)**

Sl. No.	Particulars	Approved in Tariff Order	Claimed	Allowable
1	FC: Fuel cost	40126.10	42948.62	42547.08
2	PPC: Power purchase cost	11276.49	10099.72	10075.59
3	C _D : Cost disallowable	-	-1249.15	0.00
4	±A: Prior period adjustments	-	0.00	0.00
5	FC+(PPC-C_D)+(±A)	51402.59	54297.49	52622.67

2.18.5. The amount of fuel and power purchase cost as computed above is inclusive of the amounts of gains achieved by DPL on account of its better performances on different parameters of operational and fuel consumption norms. DPL is required to pass on part of such gains achieved by it to its consumers and WBSEDCL. The amount of gains attributable to the consumers and WBSEDCL are being viewed in terms of Schedule – 9B of the Tariff Regulations and ascertained hereafter.

2.18.6. Gain sharing for better oil consumption rate

As analyzed in paragraph 2.15.4, the actual specific oil consumption rate for Unit No. 8 is found better than the normative rate as considered in the Tariff Order. The gain to be shared with the consumers and WBSEDCL for better oil consumption rate is worked out in the Table below in accordance with the provisions of paragraph A1 of Schedule-9B of the Tariff Regulations:

Table 2-16: Sharing of gains for better oil consumption rate approved by the Commission

Sl. No.	Particulars	Unit	Approved
1	Specific Consumption of Oil as per Norms	ml/kWh	1.00
2	Actual Oil Consumption	ml/kWh	0.58
3	Category		Category A
4	Sharing Ratio as per Sl. No. 2 of Category A		65%:35%
5	Total Gross Generation	MU	1157.88
6	Price of Oil	Rs./kL	41306.59
7	Gain $[(1-2) \times 5 \times 6] + 100000$	Rs. Lakh	200.88
8	Share % of WBSEDCL and Consumers	%	35%
9	Share of WBSEDCL and Consumers	Rs. Lakh	70.31

However, the above amount is to be compensated with the deficit in fixed charge recovery of



own generating stations DPL in terms of paragraph D of Schedule – 9B of the Tariff Regulations before sharing with consumers and distribution licensees as discussed in paragraph 3.27 of this order.

2.18.7. Benefits of savings in distribution loss

As analyzed in paragraph 2.8.3, DPL saved 63.67 MU by making improvements in the extent of distribution loss. In terms of paragraph C of Schedule-9B of the Tariff Regulations, 25% of the benefits of such saving are required to be passed on to the consumers. The computations in monetary terms works out as under:

Table 2-17: Monetary impact of lower distribution loss computed by the Commission

Sl. No.	Particulars	Quantum (MU)	Amount (Rs. Lakh)
1	Fuel cost for generation on normative parameters	1578.09	41099.98
2	Purchase of energy	232.16	10075.59
3	Total	1810.25	51175.57
4	Average cost per unit in distribution system (Paise/kWh)		282.70
5	Cost of quantity saved	63.67	1799.95
6	Sharing Ratio as per paragraph C of Schedule 9B		75%:25%
7	Share of DPL [75% of (5)]		1349.96
8	Share of WBSEDCL and Consumers [(5)-(7)]		449.99

In terms of paragraph C of Schedule-9B of the Tariff Regulations, gain due to better performance of distribution loss shall be shared between the distribution licensee and the consumers in the ratio of 75:25. Thus, in addition to the actual power purchase cost, 75% of the gain i.e., Rs. 1349.96 Lakh (as computed in Table 2-17) is to be received by the licensee and balance benefit of Rs. 449.99 Lakh (as computed in Table 2-17) is to be passed on to the consumers by way of actual power purchase cost allowed. As against the entitlement of DPL to the amount of Rs 1349.96 Lakh, a total amount of Rs. 1447.10 Lakh (Admissible fuel cost (FC) of Rs. 42547.08 Lakh minus the fuel cost of own generation of Rs. 41099.98 Lakh) has already been passed on to DPL while computing the allowable fuel cost for sales to WBSEDCL and the consumers by way of adopting the normative rate of distribution loss. Therefore, the balance amount of Rs. 97.14 Lakh (1447.10 – 1349.96) has to be passed on to the consumers and WBSEDCL. However, the mentioned amount is to be compensated with the deficit in fixed charge recovery of own generating stations in terms of paragraph D of Schedule – 9B of the Tariff Regulations before sharing with consumers and distribution



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

licensees as discussed in paragraph 3.27 of this order.

2.18.8. Based on the analysis done in the foregoing paragraphs, the amount of allowable fuel and power purchase cost for DPL for FY 2018-19 (upto 31.12.2018) works out as under:

**Table 2-18: Fuel and power purchase cost for FY 2018-19
(upto 31.12.2018)**

Sl. No.	Particulars	Approved in Tariff Order	Claimed	Approved
1	FC: Admissible fuel cost	40126.10	42948.62	42547.08
2	Less: Share of gains attributable to Consumers and WBSEDCL			
	i) cost saving on use of oil		0.00	0.00
3	Net fuel cost (1-2)	40126.10	42948.62	42547.08
4	PPC: Power Purchase Cost	11276.49	10099.72	10075.59
5	C _D : Cost Disallowable		-1249.15	0.00
6	±A: Prior period adjustment		0.00	0.00
7	Less: Share of gains attributable to Consumers and WBSEDCL			
	i) cost saving on distribution loss		0.00	0.00
8	Net power purchase cost (4-5+6-7)	11276.49	11348.87	10075.59
9	Allowable fuel and power purchase cost (3+8)	51402.59	54297.49	52622.67

2.18.9. The admitted fuel and power purchase cost has been considered by the Commission while approving the APR of DPL for FY 2018-19 (upto 31.12.2018) in the subsequent Chapter of the Order.



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

Annexure-2A

**COMPUTATION OF ACTUAL STATION HEAT RATE AND SPECIFIC OIL CONSUMPTION ACHIEVED
IN FY 2018-19 (upto 31.12.2018)**

Sl. No.	Particulars	Unit	Unit 7	Unit 8	Station
1	Gross Generation (Actual)	MU	607.95	1164.71	1772.66
2	Consumption of Oil (Actual)	kL	852.38	673.26	1525.64
3	Consumption of Coal (Actual)	MT	403791.95	802594.55	1206386.50
4	GCV of Oil (Actual)	kcal/lit	9354.16	9354.16	9354.16
5	Heat Value of Coal (Actual)	kcal/kg	3544.57	3544.57	3544.57
6	Heat from Oil (2x4/1000)	M. kcal	7973.31	6297.78	14271.09
7	Heat from Coal (3x5/1000)	M. kcal	1431267.94	2844850.81	4276118.75
8	Total Heat Used (6+7)	M. kcal	1439241.25	2851148.59	4290389.84
9	Station Heat Rate Achieved (8÷1)	kcal/kWh	2367.36	2447.94	2420.31
10	Normative Station Heat Rate	kcal/kWh	2345	2425	2398.51 ^{\$}
11	Specific Oil Consumption (2/1)	ml/kWh	1.40	0.58	0.86
12	Net Sent out Generation	MU	524.42	1053.67	1578.09
13	Auxiliary Consumption [((1)-(12))/1]	%	13.74%	9.53%	10.98%

Note

\$:

$$\text{Normative SHR of U\#7 \& 8 at } 2398.51 \text{ (kcal/kWh)} = \frac{4151872.30 \text{ Mkal 'Total Heat Required' for U\#7\&8 [Sl. No F of Annex-2C] }{1731.02 \text{ MU 'Gross Admissible Generation' for U\#7\&8 [Sl. No D of Annex-2C] }$$

**COMPUTATION OF COAL BASED ON MINIMUM OF DECLARED HEAT VALUE FOR DPL THERMAL POWER STATION FOR FY 2018-19 (upto 31.12.2018)**

Source	Grade of Coal	Quantity consumed	GCV	UHV min	UHV max	GCV min	GCV max	UHV Claimed	Interpolated UHV
		MT	kcal/kg	kcal/kg	kcal/kg	kcal/kg	kcal/kg	kcal/kg	kcal/kg
ECL	G-3	7041.99	6400.00	5600.00	6200.00	6049.00	6454.00	6200.00	6120.00
	G-4	198549.23	6100.00	5600.00	6200.00	6049.00	6454.00	5897.78	5675.56
	G-5	91404.60	5800.00	4940.00	5600.00	5597.00	6049.00	5455.44	5236.42
	G-6	14755.39	5500.00	4940.00	5600.00	5597.00	6049.00	5017.39	4798.36
	G-7	5132.84	5200.00	4200.00	4940.00	5089.00	5597.00	4580.20	4361.69
	G-8	7447.48	4900.00	3360.00	4200.00	4324.00	5089.00	4157.18	3992.47
BCCL	G-6	64272.27	5500.00	4940.00	5600.00	5597.00	6049.00	5017.39	4798.36
	G-7	7252.95	5200.00	4200.00	4940.00	5089.00	5597.00	4580.20	4361.69
	G-8	119268.81	4900.00	3360.00	4200.00	4324.00	5089.00	4157.18	3992.47
	G-9	8178.17	4600.00	3360.00	4200.00	4324.00	5089.00	3827.77	3663.06
	W-III	83143.08	5400.00					4102.27	4102.27
	W-IV	110886.03	4600.00					3443.45	3443.45
MCL	G-13	227164.69	3400.00	1300.00	2400.00	3113.00	3865.00	1939.22	1719.81
	G-14	204246.97	3100.00		1300.00		3113.00	1500.00	1294.57
WBMDTCL		57646.50						1425.00	1425.00
TOTAL		1206391.00						3544.94	3380.20



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

Annexure-2C

COMPUTATION OF FUEL COST FOR FY 2018-19 (UPTO 31.12.2018)

Sl. No.	Particulars	Unit	Approved in Tariff Order			Claimed in FPPCA			Actual			Approved		
			Unit VII	Unit VIII	Station	Unit VII	Unit VIII	Station	Unit VII	Unit VIII	Station	Unit VII	Unit VIII	Station
A	Sent out Energy	MU	556.28	1059.89	1616.16	1578.09	1059.29	1586.51	524.42	1053.67	1578.09	524.42	1053.67	1578.09
B	Normative Auxiliary Consumption	%	8.50%	9.00%	8.83%	8.95%	9.05%	10.50%	8.50%	9.00%	8.83%	8.50%	9.00%	8.83%
C	Auxiliary Consumption	MU	51.68	104.82	156.50	155.12	105.42	186.15	48.72	104.21	152.93	48.72	104.21	152.93
D	Gross Admissible Generation	MU	607.95	1164.71	1772.66	1733.21	1164.71	1772.66	573.14	1157.88	1731.02	573.14	1157.88	1731.02
E	Heat Rate	kcal/kWh	2345.00	2425.00	2397.56	2381.00	2447.94	2420.31	2345.00	2425.00	2398.51	2345.00	2425.00	2398.51
F	Total Heat Required (DxE)	Mkcal	1425647.23	2824426.81	4250074.05	4126779.01	2851148.59	4290389.83	1344013.30	2807859.00	4151872.30	1344013.30	2807859.00	4151872.30
G	GCV of Oil	kcal/lt	10799.00	10799.00		9354.16	9354.16	9354.16	9354.16	9354.16		9354.16	9354.16	
H	Specific Oil consumption	ml/kWh	1.00	1.00	1.00	1.00	0.58	0.86	1.00	1.00	1.00	1.00	1.00	1.00
I	Oil consumption (HXD)	KL	607.95	1164.71	1772.66	1733.21	673.26	1525.64	573.14	1157.88	1731.02	573.14	1157.88	1731.02
J	Heat from oil (GxI÷1000)	Mkcal	6565.27	12577.73		16212.75	6297.78		5361.24	10830.99		5361.24	10830.99	
K	Heat from coal (F-J)	Mkcal	1419081.96	2811849.09		4110566.26	2844850.81		1338652.06	2797028.01		1338652.06	2797028.01	
L	Average UHV of coal	kcal/kg	3770.34	3770.34		3544.94	3544.57	3544.57	3544.94	3544.94		3544.94	3544.94	
M	Coal consumption excluding transit loss (K÷Lx1000)	MT	376380.37	745781.31		1159558.77	802594.55	1206386.50	377623.33	789019.85	1166643.18	377623.33	789019.85	1166643.18
N	Transit loss	MT	1891.36	3747.64		5797.80	4877.36	7329.00	1897.60	3954.92	5862.52	1897.60	3954.92	5862.52
O	Coal consumption including transit loss (M+N)	MT	378271.73	749528.95		1165356.57	807471.91	1213715.50	379520.93	792984.77	1172505.70	379520.93	792984.77	1172505.70
P	Average price of oil	Rs./kL	47237.44	47237.44		41306.59	41306.59		41306.59	41306.59	41306.59	41306.59	41306.59	41306.59
Q	Average price of coal	Rs./MT	3483.66	3483.66		3496.78	3496.78		3444.33	3444.33	3444.33	3444.33	3444.33	3444.33
R	Cost of oil (IxP÷100000)	Rs. Lakh	287.18	550.18	837.36	715.93	278.10	630.19	236.74	478.28	715.02	236.74	478.28	715.02
S	Cost of coal (OxQ÷100000)	Rs. Lakh	13177.70	26111.04	39288.74	40749.92	28235.52	42440.96	13071.95	27313.01	40384.96	13071.95	27313.01	40384.96
T	Cost of fuel (R+S)	Rs. Lakh	13464.88	26661.22	40126.10	41465.85	28513.62	43071.15	13308.69	27791.29	41099.98	13308.69	27791.29	41099.98
U	Cost of fuel per unit (Tx10÷A)	Paise/kWh	242.05	251.55	248.28	262.76	269.18	271.48	253.78	263.76	260.44	253.78	263.76	260.44



CHAPTER-3

FIXED COST DETERMINATION UNDER APR

3.1. The Tariff Regulations specifies the classification of different fixed charge elements under controllable and uncontrollable head and also deals with the treatment of variation between projected expenditure and actual expenditure of such fixed charge elements during reconsideration of ARR at APR stage. In its order dated 11.10.2020 in respect of the tariff application of DPL for FY 2018-19 (Part-I), the Commission considered some specific principle of calculation for determination of some elements of fixed charge during projection of ARR. The basic premises of such principles of calculation are:

- i. Wholesale Price Index (WPI) and Consumer Price Index (CPI),
- ii. Business volume change namely Distribution line length and number of consumers, and
- iii. Sensitivity of expenditure elements to business volume change.

3.2. Growth rate issues

3.2.1. The values considered during projection for business volume data and inflation in the MYT application, are now compared with actual inflation indices as available from websites of Economic Advisor Govt. of India and Labour Bureau and the data provided by DPL in its APR application, in Table 3-1 below.

Table 3-1: Inflation and Business Volume

Particulars	Inflation %			Business volume	
	CPI	WPI	Combined (40:60)	Line length increase %	Consumer increase %
Considered in Tariff Order for FY 2018-19 (upto 31.12.2018)	5.40	4.26	4.72	0.00	0.00
Actual in FY 2018-19 (upto 31.12.2018)	5.40	4.26	4.72	0.74	3.22

3.3. It may be seen from Table 3-1 above that, the business volume parameters and inflation have not shown any significant growth as compared to tariff projections. Further, business volume growth in percentage is not more than 5% and inflation indexes have also not increased more than projected in the Tariff Order, hence Regulation 2.6.10 of Tariff Regulations is not applicable for controllable item which is included in the working capital base.

3.4. Now the Commission proceeds to review each of such fixed charge elements claimed by DPL in line with the Tariff Regulations.



3.5. Project Cost of Unit VII and Unit VIII

3.5.1. In the Tariff Order dated 11.10.2020, the Commission decided not to service any capital cost beyond 95% of the provisional project cost of Units VII and VIII of DPL due to the reason that the report as per Regulation 2.8.1.4.13 of the Tariff Regulations has not yet been submitted by DPL. As there is no change in the status of finalisation of project cost, the Commission decided to continue with the same approach in the present APR. In case of any disallowance in the project cost of Unit VII and VIII by the Commission after submission of the final project cost, the amount withheld above shall be adjusted with the reduction in project cost, if any, and corresponding impact on tariff shall accordingly be adjusted in subsequent APR / truing up exercise following the determination of actual project cost.

3.6. Unit VI

3.6.1. The Commission finds that Unit VI was totally inoperative during the period April to December 2018. Accordingly, in terms of Regulation 5.25.1 of the Tariff Regulations, the Commission proceeds to consider allowance for capacity charge of Unit VI only under the heads employee cost, interest on capital loan, depreciation and advance against depreciation.

3.7. The Commission in paragraph 8.9 of the MYT Order dated 04.03.2015 had directed DPL to provide all the expenditure or cost element separately for generation and distribution functions in their Annual Accounts or through auditor's certificate from 2014-15 onwards for regulatory requirements. However, DPL has neither submitted auditor's certificate nor properly segregated the elements of expenditure in their claim between generation and distribution functions. It is further observed that in Form E(B), no separate claim for distribution function is shown. Accordingly, the Commission proceeds to determine the admissibility of elements of cost to generation and distribution functions based on the characteristics of the expenditure and details to the extent available in specified forms and annexures submitted with the Petition.

3.8. Employee cost

3.8.1. The Commission, in the Tariff Order, had approved the employee cost of Rs. 8057.07 Lakh. As against the same, DPL has claimed the employee cost of Rs. 6128.93 Lakh. The actual employee cost as per the split accounts is Rs. 6129.17 Lakh.

3.8.2. The Commission, in the Tariff Order, ruled as under:

"5.4.4 The Commission finds on analysis that the actual employees cost as claimed for regular employees is less than that of the actuals of 2017-18 and that allowed in Tariff



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

Order of 2017-18 (Rs. 10534.29 lakhs). The Commission, thus, admits the employee cost including terminal benefits for power business but excluding the cost allowable for service department for the year 2018-19..."

"5.4.6 If there be any variation in the admitted amount, DPL shall furnish relevant information and supporting documents in this respect with the application for APR for the concerned year and the same will be considered for adjustment in APR to the extent it is found fit by the Commission. Along with the information and documents as mentioned above, DPL shall, in the application for APR for the concerned year, also furnish the information in the format given in Form 1.17(h) of Annex - 1 to the Tariff Regulations indicating details in respect of both regular and contracted employees.

The above information shall also show the expenditure of own employees and employees on contract in regular establishment separately. Interest payment on Contributory Provident Fund and General Provident Fund shall not be considered as it is not permissible unless it is explicitly established that in spite of investment of such fund in a prudent manner and management of fund efficiently, there is shortfall in accrued interest."

3.8.3. DPL has complied with the above stated directive of the Commission. DPL has furnished the break-up of employees engaged both in regular services and contractual services as per Form 1.17(h) where they have mentioned the number of contractual employees as 7 nos. for power business. According to the submissions in Form 1.17(h), these 7 nos. employees is basically allocated employees from Service Department.

3.8.4. Hence, based on the submission of DPL, the Commission admits the employee cost claimed by DPL.

Table 3-2: Employee cost for FY 2018-19 (upto 31.12.2018) (Rs. Lakh)

Table with 5 columns: Sl. No., Particulars, Approved in Tariff Order, Claimed in APR, and Approved. It lists costs for Unit VI, Unit VII, Unit VIII, Total Generation, Distribution, and Grand Total.

3.9. Centrally Maintained Expenses

3.9.1. The Commission, in the Tariff Order, had approved the centrally maintained expenses of Rs. 1540.07 Lakh. As against the same, DPL has claimed the centrally maintained expenses of Rs. 3797.97 Lakh.



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

3.9.2. DPL has furnished the cost audit report for FY 2018-19 with its APR application indicating the allocation logic. Therefore, the Commission finds it fit to consider the revised allocation ratios for apportionment of employee cost of Service Department and Central Workshop to power business. Accordingly, the Commission admits the centrally maintained expenses as claimed by DPL.

**Table 3-3: Centrally maintained expenses for FY 2018-19
(upto 31.12.2018) (Rs. Lakh)**

Sl. No.	Particulars	Approved in Tariff Order	Claimed in APR	Approved
1	Unit VI	318.56	759.59	759.59
2	Unit VII	297.88	1519.19	1519.19
3	Unit VIII	248.23	1519.19	1519.19
4	Total Generation	864.67	3797.97	3797.97
5	Distribution	675.40	0.00	0.00
6	Grand Total	1540.07	3797.97	3797.97

3.10. Coal and ash handling expenses

3.10.1. The Commission, in the Tariff Order, had approved the coal and ash handling expenses of Rs. 169.68 Lakh. As against the same, DPL has claimed the ash handling expenses of Rs. 212.80 Lakh. DPL has included the coal handling expenses of Rs. 516.94 Lakh in its claim of fuel cost. The claim of coal and ash handling expenses thus works out to Rs. 729.74 Lakh.

3.10.2. Considering the claimed amount of Rs. 729.74 Lakh as the total amount for actual generation, the proportionate allocation to Units VII and VIII is made as per the unit wise actual generation based for the year and admissible amount for APR of FY 2018-19 (upto 31.12.2018) on head of coal and ash handling expenses as given in Table below:

**Table 3-4: Coal and ash handling expenses for FY 2018-19 (upto 31.12.2018)**

Unit	Gross generation projected in Tariff Order	Coal and ash handling expenses admitted in Tariff Order	Actual gross generation	Proportionate expenses for actual generation	Ash handling expenses claimed	Coal handling expenses claimed in coal price but not considered by the Commission in coal price	Coal and ash handling expenses claimed	Coal and ash handling expenses admitted in APR
	MU	Rs. Lakh	MU	Rs. Lakh	Rs. Lakh	Rs. Lakh	Rs. Lakh	Rs. Lakh
Unit VI	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unit VII	607.95	58.19	607.95	58.19	72.98	177.29	250.27	58.19
Unit VIII	1164.71	111.49	1164.71	111.49	139.82	339.65	479.47	111.49
Total	1772.66	169.68	1772.66	169.68	212.80	516.94	729.74	169.68

3.10.3. The Commission admits the coal and ash handling expenses of Rs. 169.68 Lakh under the head of generation function.

3.11. Water charges

3.11.1. The Commission, in the Tariff Order, had approved the water charges of Rs. 452.41 Lakh. As against the same, DPL has claimed the water charges of Rs. 1059.30 Lakh. The claimed water charges are inclusive of the water charges amounting to Rs. 25.48 Lakh for other than own generation. The water charges claimed for own generation in Form 1.12 is Rs. 350.56 lakh for Unit VII and Rs. 683.26 lakh for Unit VIII, totalling to Rs. 1033.82 lakh.

3.11.2. DPL has not complied with the directives in paragraph number 5.6.3, 5.6.4 and 5.6.5 of the tariff order. Therefore, the Commission decides to admit the water charges considering the rate of Rs. 6.50 per KL.

3.11.3. The water charges are categorized as uncontrollable. The Commission decides to allow the water charges in proportion to the actual amount of generation related to sales of electricity to consumers and licensee with respect to the admitted amount against the projected generation as approved in the Tariff Order. The detail of such calculation is shown in the Table below:

Table 3-5: Water charges for FY 2018-19 (upto 31.12.2018)

Unit	Gross generation projected in Tariff Order	Water charges admitted in Tariff Order	Actual gross generation	Proportionate expenses for actual generation	Water charges claimed	Water charges admitted in APR
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Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

	MU	Rs. Lakh	MU	Rs. Lakh	Rs. Lakh	Rs. Lakh
Unit VI	0.00	0.00	0.00	0.00	0.00	0.00
Unit VII	607.95	155.16	607.95	155.16	350.56	155.16
Unit VIII	1164.71	297.25	1164.71	297.25	683.26	297.25
Total	1772.66	452.41	1772.66	452.41	1033.82	452.41

3.11.4. The amount as above is admitted under generation function. The Commission does not admit the water charges claimed for distribution function as no expenses were approved in the Tariff Order towards the same.

3.12. Operation and Maintenance (O&M expenses)

3.12.1. O&M expenses for Generation

The Commission, in the Tariff Order, had approved the O&M expenses for generation function as Rs. 3106.88 Lakh. As against the same, DPL has claimed the expenses of Rs. 5117.50 Lakh.

O&M expenses is categorised as controllable. The Commission decides to allow O&M expenses in accordance with the norms specified in the Tariff Order. Further, the claimed O&M expenses are inclusive of the expenses towards Unit VI amounting to Rs. 113.71 Lakh. However, it is observed that Unit VI was not in operation during FY 2018-19 (upto 31.12.2018) and thus in terms of Regulation 5.25 of the Tariff Regulations, O&M expenses are not allowable for Unit VI.

3.12.2. O&M expenses for Distribution

The Commission, in the Tariff Order, had approved the O&M expenses for distribution function as Rs. 904.95 Lakh. As against the same, DPL has claimed the expenses of Rs. 1491.45 Lakh.

The Commission, in the Tariff Order, ruled as under:

“5.7.2.2 Further as the O&M expenditure is controllable in nature, the Commission finds it prudent to apply the inflation rates on the admitted (O&M) expenditure in the Tariff Order of 2017 – 18 for each sub-head with due weightage to sensitivity parameter. The total line length and consumer number has been considered as sensitivity parameters in line with the earlier Tariff Orders. Since DPL has not submitted the line length as on 31st December, 2018, the total line length and consumer number as on 31st March, 2018 has been considered for computation of O&M expenses. O&M expenses so derived shall be adjusted during the APR based on actual line length and consumer number following the same principle.”



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

“5.7.2.4 The truing up exercise in APR will be done while applying the regulation 2.6.10(v) of the Tariff Regulations on the basis of revised targeted business volume parameter.

5.7.2.5 The above expenditure be availed of on adherence to the conditions as prescribed in regulation 5.23.1 of the Tariff Regulations.”

3.12.3. DPL, in its APR Petition, has submitted the total line length and consumer number as on 31.12.2018 and accordingly, the Commission has admitted the O&M expenses in line with the methodology specified in the Tariff Order as under:

Sensitivity Parameter (SP)	As at 31.12.2018		
Total Line Length (DLL)	ckm	1525.16	---A
Total Consumers (CSM)	No.	66571.00	---B

Particulars	SP	Per unit cost admitted in Tariff Order	Admissible expenses	O&M expenses claimed	O&M expenses admitted in APR
[1]	[2]	[3]	[4] x (A or B)	[5]	[6]
		Rs. Lakh	Rs. Lakh	Rs. Lakh	Rs. Lakh
R&M expenses (A)	DLL	0.242	276.82	186.58	186.58
Auditors' fees (B)	DLL	0.001	1.14	5.63	1.14
Other A&G expenses (C)	CSM	0.012	599.14	1271.37	599.14
Rates & Taxes (D)	DLL	0.034	38.89	21.72	21.72
Insurance (E)	DLL	0.012	13.73	6.15	6.15
A&G [F=(B:E)]			652.90		628.15
Adjustment in terms of Regulation 2.5.5 (iv) of Tariff Regulations (652.90-628.15)					24.75
Total [(A:D)+F]			929.72	1491.45	839.48

3.12.4. Based on the above, the total O&M expenses admitted by the Commission are as under:

**Table 3-6: O&M expenses for FY 2018-19 (upto 31.12.2018)
(Rs. Lakh)**

Sl. No.	Particulars	Approved in Tariff Order	Claimed in APR	Approved
1	Unit VI	0.00	113.71	0.00
2	Unit VII	1923.75	2477.31	1923.75
3	Unit VIII	1183.13	2526.48	1183.13
4	Total Generation	3106.88	5117.50	3106.88
5	Repairs & Maintenance	274.80	186.58	186.58



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

Sl. No.	Particulars	Approved in Tariff Order	Claimed in APR	Approved
6	Auditors Fees	0.64	5.63	1.14
7	Other A&G expenses ¹	629.51	1299.24	627.01
8	Adjustment in terms of Regulation 2.5.5 (iv) of Tariff Regulations			24.75
9	Total Distribution	904.95	1491.45	839.48
10	Grand Total	4011.83	6608.95	3946.36
Note:				
1: 7=C+D+E of previous Table				

3.13. Depreciation

3.13.1. The Commission, in the Tariff Order, had approved the depreciation of Rs. 9899.80 Lakh. As against the same, DPL has claimed the depreciation of Rs. 10354.26 Lakh.

3.13.2. The Commission, in the Tariff Order, ruled as under:

“5.8.1 DPL has submitted detailed computations in this regard and the Commission agrees to such computations for depreciation. The Commission however, has allowed depreciation considering 5% reduction of provisional project cost of Units VII & VIII...”

3.13.3. The Commission notes that the claim of DPL in APR of FY 2018-19 is significantly higher than what was approved in Tariff Order of FY 2018-19. As Final Project cost of Unit VII and VIII of DPL is still pending for approval, the Commission finds it prudent to approve Depreciation at same level as that of approved in Tariff Order. Any adjustment in regard to final Project cost of the same would be taken up subsequently. The depreciation towards Unit VI is considered as proposed by the Petitioner and depreciation towards the distribution assets is considered based on the value proposed by the Petitioner reduced by the depreciation proportioned considering the consumer contribution in the capital cost of the distribution assets.

Table 3-7: Depreciation for FY 2018-19 (upto 31.12.2018) (Rs. Lakh)

Sl. No.	Particulars	Approved in Tariff Order	Claimed in APR	Approved
1	Unit VI	1124.22	1205.48	1205.48
2	Unit VII	3264.44	3553.37	3264.44
3	Unit VIII	4480.40	4877.59	4480.40
4	Total Generation	8869.06	9636.44	8950.32



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

Sl. No.	Particulars	Approved in Tariff Order	Claimed in APR	Approved
5	Distribution	1030.74	717.82	636.64
6	Grand Total	9899.80	10354.26	9586.96

3.14. Interest on Borrowed Capital

3.14.1. The Commission, in the Tariff Order, had approved the interest on borrowed capital of Rs. 18053.16 Lakh. As against the same, DPL has claimed the interest on borrowed capital of Rs. 24498.98 Lakh.

3.14.2. On perusal of the submissions of DPL in the petition, it has been observed that DPL has not complied with the Commission's directive in full such as non-submission of statement of interest actually paid year wise, statement of interest payable, penal interest chargeable / paid year wise, year wise provision in audited accounts, fixing up of accountability for failing to make timely servicing of loans in a specific manner, and amount of interest admitted by the Commission in the respective APR Orders.

3.14.3. DPL has not submitted the compliance to the above stated directive of the Commission. Therefore, in line with the approach adopted in the Tariff Order, the Commission has not considered the portion of loan pertaining to FITL included in the restructured loan of PFCL and accordingly determined the admissible interest for FY 2018-19 and proportionately allocated for nine months period from 01.04.2018 to 31.12.2018. Further, 5% of the admissible interest has been withheld for Units VII & VIII.

Table 3-8: Interest on borrowed capital for FY 2018-19 (upto 31.12.2018) (Rs. Lakh)

Sl. No.	Particulars	Approved in Tariff Order	Claimed in APR	Approved
1	Unit VI	0.00	0.00	0.00
2	Unit VII	3508.61	4598.66	3319.15
3	Unit VIII	13212.34	18568.11	13401.77
4	Total Generation	16720.95	23166.77	16720.92
5	Distribution	1332.21	1332.21	1332.21
6	Grand Total	18053.16	24498.98	18053.13



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

3.14.4. DPL is being directed to submit necessary details, justification and documentary evidence through future APR petition with respect to the actual interest paid along with the details of interest on FITL for examination of the Commission and further necessary action, if any.

3.15. Other Finance Charges

3.15.1. The Commission, in the Tariff Order, had approved the other finance charges of Rs. 2095.78 Lakh. As against the same, DPL has claimed the other finance charges of Rs. 1711.23 Lakh. The claimed finance charges are towards guarantee fees and bank charges. The Commission admits the other finance charges claimed by DPL.

Table 3-9: Other finance charges for FY 2018-19 (upto 31.12.2018) (Rs. Lakh)

Sl. No.	Particulars	Approved in Tariff Order	Claimed in APR	Approved
1	Unit VI	0.00	0.00	0.00
2	Unit VII	0.00	4.32	4.32
3	Unit VIII	2095.78	1706.91	1706.91
4	Total Generation	2095.78	1711.23	1711.23
5	Distribution	0.00	0.00	0.00
6	Grand Total	2095.78	1711.23	1711.23

3.16. Bad debts

3.16.1. The Commission, in the Tariff Order, had not approved any bad debts. DPL has claimed the bad debts of Rs. 4852.88 Lakh.

3.16.2. The Commission, in the Tariff Order, ruled as under:

“5.13.2 As the amounts of bad debts have only been provided for without the same having been written off, the Commission is not inclined to admit the claim at present for obvious reason. However, after the amounts of bad and doubtful debts have actually been written off from the books of accounts after following usual procedure, the same may be considered by the Commission at the time of Annual Performance Review of the year.”

3.16.3. DPL submitted that it has provided for Rs. 4852.88 Lakh towards bad & doubtful debts in its annual accounts but the amount has not been written off. DPL requested the Commission to consider its claim in line with the regulatory provisions.



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

3.16.4. It is observed from the submissions of DPL that though provisioning of bad debts has been done but that has not been written off. Thus, no amount is admitted under this head.

Table 3-10: Bad debts for FY 2018-19 (upto 31.12.2018) (Rs. Lakh)

Sl. No.	Particulars	Approved in Tariff Order	Claimed in APR	Approved
1	Unit VI	0.00	0.00	0.00
2	Unit VII	0.00	0.00	0.00
3	Unit VIII	0.00	0.00	0.00
4	Total Generation	0.00	0.00	0.00
5	Distribution	0.00	4852.88	0.00
6	Grand Total	0.00	4852.88	0.00

3.17. Income tax

3.17.1. The Commission, in the Tariff Order, had not approved any income tax. DPL has claimed the income tax of Rs. 2549.48 Lakh.

3.17.2. The Commission, in the Tariff Order, ruled as under:

“5.14.1 ... Till the time the income tax is assessed and the part of the tax payable is identified pertaining to power business, the Commission cannot allow any provision in this regard. However, in case, such tax payable is identified pertaining to power business of DPL, provision is made in the accounts and audited, on submission of conclusive documentary evidences with the applicable of APR in succeeding year, the same will be taken care of as per relevant regulation of the Tariff Regulations.”

3.17.3. The Commission observes from the audited accounts for FY 2018-19 that no amount has been either provided for or actually paid on account of income tax. Accordingly, no amount has been considered by the Commission.

Table 3-11: Income tax for FY 2018-19 (upto 31.12.2018) (Rs. Lakh)

Sl. No.	Particulars	Approved in Tariff Order	Claimed in APR	Approved
1	Unit VI	0.00	0.00	0.00
2	Unit VII	0.00	901.23	0.00
3	Unit VIII	0.00	756.59	0.00
4	Total Generation	0.00	1657.82	0.00
5	Distribution	0.00	891.66	0.00
6	Grand Total	0.00	2549.48	0.00



3.18. Interest on Consumers' Security Deposits

- 3.18.1. The Commission, in the Tariff Order, had approved the interest on consumers' security deposits of Rs. 127.91 Lakh. As against the same, DPL has claimed the interest on consumers' security deposits of Rs. 125.94 Lakh.
- 3.18.2. DPL submitted that at the time of slump sale agreement and subsequent transfer of distribution business to WBSEDCL, entire security deposit amount along with accrued interest has been transferred to WBSEDCL for benefit of consumers. DPL submitted that it has transferred the amount of Rs. 2797.04 Lakh to WBSEDCL under the head Security Deposit from Consumers out of which interest amount is Rs. 362.25 Lakh. DPL submitted a document signed by DPL and WBSEDCL and titled 'Annexure to Department of Power & Non-Conventional Energy Sources' under Order No. 244/PO/O/C-IV/IE-60/13(Pt.-VA) dated 23.09.2019 in support of its claim wherein Rs. 2797.04 Lakh is recorded as 'Security Deposits from Consumers (incl. interest)' under current liabilities.
- 3.18.3. DPL submitted that the amount of Rs. 125.94 Lakh has been charged to Profit & Loss Account towards interest payable to the consumers on their security deposit. Thus, they are only providing for the interest in accounts and there is no actual pay out. Therefore, the Commission does not allow any amount under this head.

Table 3-12: Interest on consumers security deposits for FY 2018-19 (upto 31.12.2018) (Rs. Lakh)

Sl. No.	Particulars	Approved in Tariff Order	Claimed in APR	Approved
1	Unit VI	0.00	0.00	0.00
2	Unit VII	0.00	0.00	0.00
3	Unit VIII	0.00	0.00	0.00
4	Total Generation	0.00	0.00	0.00
5	Distribution	127.91	125.94	0.00
6	Grand Total	127.91	125.94	0.00

3.19. Reserve for unforeseen exigencies

- 3.19.1. The Commission, in the Tariff Order, had approved the reserve for unforeseen exigencies of Rs. 593.21 Lakh. As against the same, DPL has claimed the reserve for unforeseen exigencies of Rs. 701.96 Lakh.



3.19.2. In this regard, DPL submitted as under:

- The actual gross value of fixed assets of the power station of DPL as on 01.04.2018 as per Note no. 5(a) of the audited accounts for power plant stood at Rs. 372676.33 Lakh.
- Note no. 2 of the consolidated annual accounts indicates that 0.25% of the aforesaid value of assets comes to Rs. 931.69 Lakh and proportionate part of the said amount i.e., Rs. 701.96 Lakh was provided during FY 2018-19 (upto 31.12.2018).
- DPL has complied with the provisions of investing the amount thus provided for in fixed deposit as reserve for unforeseen exigencies.
- Interest on term deposit against this head amounting to Rs. 227.87 Lakh (as per note 2 of the audited accounts) was earned and accounted for during FY 2018-19 and proportionate amount of Rs. 171.68 Lakh has been shown for the period from 01.04.2018 to 31.12.2018.
- The details of reserve for unforeseen exigencies are as under:

Table 3-13: Details of reserve for unforeseen exigencies submitted by DPL (Rs. Lakh)

Financial Year	Opening balance	Add: transfer from P&L A/c	Add: Interest	Closing balance
2009-10	-	923.09	-	923.09
2010-11	923.09	801.56	30.76	1755.72
2011-12	1755.72	-	-	1755.72
2012-13	1755.72	1032.71	68.56	2857.02
2013-14	2857.01	529.88	44.14	3431.03
2014-15	3431.03	511.29	35.64	3977.96
2015-16	3977.96	916.06	127.35	5021.37
2016-17	5021.37	925.25	99.85	6046.48
2017-18	6046.48	930.45	113.12	6976.93
2018-19 (upto 31.12.2018)	6976.93	701.96	171.68	7678.89

3.19.3. Regulation 5.11.1 of the Tariff Regulations specify that the licensee may provide and maintain a reserve for dealing with unforeseen exigencies up to 0.25% of the value of gross fixed assets at the beginning of the year annually and the provision made for the year will be allowed in their Aggregate Revenue Requirement subject to an overall ceiling of 5% of the value of gross fixed assets at the beginning of the year. The existing amount of contingency reserve in the books of accounts of the licensee, if any, will have to be considered while arriving at the overall ceiling as stated herein. Regulation 5.24.1 of the Tariff Regulations specify that the sum apportioned to the reserve for unforeseen exigencies shall have to be



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

invested separately prudently. Further, Regulation 5.24.2 of the Tariff Regulations specify that the interest accrued from such investment shall be reinvested under the same reserve / fund.

3.19.4. From the submissions of DPL, the Commission finds that Regulation 5.11.1 read with 5.24.1 and 5.24.2 have been complied with and accordingly admits the reserve for unforeseen exigencies claimed by DPL. However, the Commission has withheld 5% amount for Units VII & VIII in line with the approach made in the Tariff Order.

**Table 3-14: Reserve for unforeseen exigences for FY 2018-19
(upto 31.12.2018) (Rs. Lakh)**

Sl. No.	Particulars	Approved in Tariff Order	Claimed in APR	Approved
1	Unit VI	0.00	0.00	0.00
2	Unit VII	249.21	262.40	249.28
3	Unit VIII	344.00	363.71	345.52
4	Total Generation	593.21	626.11	594.80
5	Distribution	0.00	75.85	75.85
6	Grand Total	593.21	701.96	670.65

3.20. Return on Equity

3.20.1. The Commission, in the Tariff Order, had approved the return on equity of Rs. 10129.35 Lakh. As against the same, DPL has claimed the return on equity of Rs. 13379.57 Lakh.

3.20.2. The admitted equity base at the year end of FY 2017-18 as approved in the APR Order for FY 2017-18 has been considered as the equity base at the beginning of the year for FY 2018-19.

3.20.3. DPL has claimed the net addition to original cost of fixed assets of Rs. 6971.77 Lakh for generation function as against the net addition of Rs. 426.54 Lakh approved by the Commission in the Tariff Order as under:

Table 3-15: Net addition to original cost fixed assets claimed by DPL (Rs. Lakh)

Sl. No.	Particulars	Approved in Tariff Order	Claimed in APR
1	Unit VI	0.00	3085.31
2	Unit VII	29.34	3832.12
3	Unit VIII	397.20	54.34
4	Total Generation	426.54	6971.77
5	Distribution	0.00	0.00
6	Grand Total	426.54	6971.77



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

- 3.20.4. The addition to fixed assets of Unit VI is not allowable as Unit VI was not in operation during FY 2018-19. The final project cost of Units VII & VIII is yet to be approved by the Commission and hence, the Commission finds it fit to not consider the addition to fixed assets at this stage. The Commission will consider the asset addition for Unit VII and Unit VIII at the time of finalisation of Capital Cost subject to prudence check.
- 3.20.5. DPL has not claimed any actual equity addition during the year and hence, no equity addition has been considered during the year. In accordance with the Tariff Regulations, return on equity base is allowable @15.5% on generating assets and 16.5% on distribution assets. Further, 5% of the admissible return on equity has been withheld for Units VII & VIII.

**Table 3-16: Return on equity for FY 2018-19 (upto 31.12.2018)
(Rs. Lakh)**

Sl. No.	Particulars	Approved					
		Unit VI	Unit VII	Unit VIII	Total Generation	Distribution	Total
1	Actual equity base at the beginning of the year	13186.63	36256.00	34000.00	83442.63	18517.77	101960.40
2	Admissible equity base at the beginning of the year	5710.88	36256.00	29659.04	71625.92	15936.92	87562.84
3	Actual addition/deletion to equity base during the year	0.00	0.00	0.00	0.00	0.00	0.00
4	Net addition to original cost of fixed assets during the year	0.00	0.00	0.00	0.00	0.00	0.00
5	Normative addition to equity base (30% of 4)	0.00	0.00	0.00	0.00	0.00	0.00
6	Addition to equity base considered for the year (lower of 3 and 5)	0.00	0.00	0.00	0.00	0.00	0.00
7	Admissible equity base at the closing of the year (2+6)	5710.88	36256.00	29659.04	71625.92	15936.92	87562.84
8	Average admissible equity base for allowing returns	5710.88	36256.00	29659.04	71625.92	15936.92	87562.84
9	Rate of Return	15.50%	15.50%	15.50%		16.50%	
10	Allowable Return	663.89	4214.76	3447.86	8326.51	1972.19	10298.71
11	Admitted Return	0.00	4004.02	3275.47	7279.49	1972.19	9251.68

**Table 3-17: Return on equity for FY 2018-19 (upto 31.12.2018)
(Rs. Lakh)**

Sl. No.	Particulars	Approved in Tariff Order	Claimed in APR	Approved
1	Unit VI	0.00	2768.96	0.00
2	Unit VII	4472.72	4729.62	4004.02
3	Unit VIII	3754.87	3970.55	3275.47
4	Total Generation	8227.59	11469.13	7279.49
5	Distribution	1901.76	1910.45	1972.19
6	Grand Total	10129.35	13379.57	9251.68

3.21. Interest on Working Capital

3.21.1. The Commission, in the Tariff Order, had approved the interest on working capital of Rs. 720.97 Lakh. As against the same, DPL has claimed the interest on working capital of Rs. 1578.22 Lakh.

3.21.2. In terms of Regulation 5.6.5.1 of the Tariff Regulation, working capital requirement shall be assessed on normative basis @ 18% on the base amount derived by summation of annual fixed charges and fuel and power purchase cost reduced by the elements of ARR determined viz., depreciation, return on equity, bad debts and reserve for unforeseen exigencies. However, the above assessment of requirement of working capital would be 10% instead of 18% on the base amount since DPL has already introduced Monthly Fuel Cost Adjustment or Monthly Variable Cost Adjustment for recovery of monthly variation in variable cost. Further, in accordance with Regulation 5.6.5.2, during APR for the concerned year, interest on working capital will be allowed on the amount so assessed on normative basis or the actual amount of interest paid, whichever is less. Hence, The Interest on working capital on normative basis is computed below:

**Table 3-18: Normative Interest on Working Capital for FY
2018-19 (Rs. Lakh)**

Sl. No.	Particulars	Allowable		
		Total Generation	Distribution	Total
1	Annual Fixed Charges including interest on working capital for generation function	44314.58	6553.77	50868.35
2	Fuel cost / power purchase cost	42547.08	10075.59	52622.67



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

Sl. No.	Particulars	Allowable		
		Total Generation	Distribution	Total
3	Sub-total	86861.66	16629.36	103491.02
	Less:			
4	Depreciation	8950.32	636.64	9586.96
5	RoE	7279.49	1972.19	9251.68
6	Bad and doubtful debt	0.00	0.00	0.00
7	Reserve for unforeseen exigencies	594.80	75.85	670.65
8	Sub-total	16824.61	2684.68	19509.29
9	Allowable charges for working capital	70037.05	13944.68	83981.73
10	Normative requirement of working capital	7003.70	1394.47	8398.17
11	Security deposit held as on 31.03.2018/ 31.12.2018		3559.26	3559.26
12	Requirement of working capital after utilising the security deposit	7003.70	0.00	7003.70
13	Interest rate	11.50%	11.50%	
14	Normative Interest on working capital	604.07	0.00	604.07
15	Interest on working capital actually incurred	229.89	0.00	229.89
16	Interest on working capital allowed	229.89	0.00	229.89

Table 3-19: Interest on working capital for FY 2018-19 (upto 31.12.2018) (Rs. Lakh)

Sl. No.	Particulars	Approved in Tariff Order	Claimed in APR	Approved
1	Unit VI	0.00	306.14	0.00
2	Unit VII	230.46	412.32	73.48
3	Unit VIII	490.51	859.76	156.41
4	Total Generation	720.97	1578.22	229.89
5	Distribution	0.00	0.00	0.00
6	Grand Total	720.97	1578.22	229.89

3.22. Income from other sources

3.22.1. The Commission, in the Tariff Order, had approved the income from other sources of Rs. 1606.53 Lakh. As against the same, DPL has claimed the income from other sources of Rs. 2142.93 Lakh.

3.22.2. The income from rental of meters and other apparatus, replacement/repair of meter, meter testing charges, transmission and wheeling charges have been considered in the distribution



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

head. The rest of income has been allocated to generation and distribution function in the ratio of fixed cost.

Table 3-20: Income from other sources for FY 2018-19 (upto 31.12.2018) (Rs. Lakh)

Sl. No.	Particulars	Approved in Tariff Order	Claimed in APR	Approved
1	Unit VI	0.00	0.00	0.00
2	Unit VII	467.37	734.95	990.67
3	Unit VIII	310.33	1407.98	657.80
4	Total Generation	777.70	2142.93	1648.47
5	Distribution	828.83	0.00	494.46
6	Grand Total	1606.53	2142.93	2142.93

3.23. Interest credit

3.23.1. The Commission, in the Tariff Order, had approved the interest credit of Rs. 1077.10 Lakh. As against the same, DPL has claimed the interest credit of Rs. 1061.31 Lakh.

3.23.2. In terms of Regulation 5.5.3 of the Tariff Regulations, where the actual amount of loan repayment in any year falls short of depreciation allowable during the year, then interest credit of such excess depreciation charges at the rate of weighted average cost of debt is admissible. Based on the admitted depreciation and repayment of loans considered for admitting borrowing cost, interest credit has been worked out as follows:

Sl. No.	Particulars	Computation of interest credit (Rs. Lakh)					
		Unit VI	Unit VII	Unit VIII	Total Generation	Distribution	Total
1	Depreciation	1205.48	3264.44	4480.40	8950.32	636.64	9586.96
2	Repayment	0.00	0.00	0.00	0.00	0.00	0.00
3	Excess fund created	1205.48	3264.44	4480.40	8950.32	636.64	9586.96
4	Weighted average rate of interest of existing loan	10.25%	10.25%	10.25%		10.25%	
5	Interest credit	123.56	334.61	459.24	917.41	65.26	982.67

**Table 3-21: Interest credit for FY 2018-19 (upto 31.12.2018)
(Rs. Lakh)**

Sl. No.	Particulars	Approved in Tariff Order	Claimed in APR	Approved
1	Unit VI	122.32	132.77	123.56
2	Unit VII	355.17	391.35	334.61
3	Unit VIII	487.47	537.19	459.24
4	Total Generation	964.96	1061.31	917.41
5	Distribution	112.14	-	65.26
6	Grand Total	1077.10	1061.31	982.67

3.24. Benefits to be passed on to consumers and other licensees

3.24.1. DPL in its APR Petition (Form 1.24) has showed no benefits to be passed on to consumers and licensees.

3.24.2. It is noted from FPPCA Petition that DPL has sold 0.90 MU of power to persons other than consumers and licensees. From the audited accounts, the income from sale to IEX comes to Rs. 34.00 Lakh. In accordance with the provisions of Regulation 5.15.2(iv) of the Tariff Regulations and the variable cost at 268.08 paise/kWh as arrived in FPPCA computation, the benefits to be passed on to consumers and other licensees is as under:

Table 3-222: Benefit to be passed on to consumers and other licensees for FY 2018-19 (upto 31.12.2018)

Sl. No.	Particulars	Unit	Value
1	Share of benefit from sale to others	%	50%
2	Sale of power to person other than consumer and licensee	MU	0.90
3	Notional sale of power against Swap Out	MU	0.00
4	Total sale (2+3)	MU	0.90
5	Sale of power to person other than consumer and licensee	Rs. Lakh	34.00
6	Notional sale of power against Swap Out	Rs. Lakh	0.00
7	Total sale (5+6)	Rs. Lakh	34.00
8	Variable cost	Paise/kWh	268.08
9	Cost of power of sale in (2) above	Rs. Lakh	24.13
10	Cost of power of sale in (3) above	Rs. Lakh	0.00
11	Other charges for such sale	Rs. Lakh	0.00
12	Total cost of sale (9+10+11)	Rs. Lakh	24.13



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

Sl. No.	Particulars	Unit	Value
13	Amount of gain derived from sale	Rs. Lakh	9.87
14	Share of benefit from sale to others (50% of 13)	Rs. Lakh	4.94

3.25. Fixed charges

3.25.1. Based on the foregoing analysis, the amount of fixed charges allowable under different heads has been shown in Annexure-3A. The fixed charge for generation works out to Rs. 44314.58 Lakh (Ra. 3265.36 lakh for Unit No. 6 + Rs. 14579.62 lakh for Unit No. 7 + Rs. 26469.60 lakh for Unit No. 8) and for distribution works out to Rs. 6553.77 Lakh.

3.26. Admissibility of Capacity Charges based on Availability

3.26.1. In terms of Regulation 6.4.2 of the Tariff Regulation, the recovery of capacity charges for generating station of DPL shall be against the normative availability. Schedule 9A of the Tariff Regulations specify the target Plant Availability Factor (PAF) for coal fired thermal generating stations.

3.26.2. In Form 1.1(a), the actual PAF of Unit 6, 7 and 8 are mentioned 0%, 33.37% and 74.13% respectively. In Form 1.1, the actual weighted average PAF in respect of Unit No. 6 to 8 of DPL during FY 2018-19 (upto 31.12.2018) is 43.30%. DPL has submitted that no generation could be obtained from Unit 6 due to its high emission and restriction by WBPCB. DPL has prayed before the Commission that due to non-availability of Unit No. 6, target availability for DPL as a whole need to be considered without taking into account Unit No. 6 for the reasons beyond the control of the petitioner. DPL, vide its additional submission dated 15.09.2022 submitted as under:

"DPL in its APR application has submitted Overall Station PAF as 43.30% for April'18-Dec'18 and 39.22% for Jan'19-March'19 inadvertently taken unit no #6(110 MW) in consideration which remain inoperative throughout the financial year of 2018-19. As such, Hon'ble Commission is requested to re-consider PAF as computed below:

PAF for April'18-Dec'18

Units	Plant Availability Factor
Unit 6	-
Unit 7	33.37%
Unit 8	74.13%
Overall (Unit #VII and Unit #VIII)	51.85%



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

3.26.3. The Commission finds that the COD of Unit No. 7 and 8 are 30.04.2008 and 01.10.2014 respectively. Therefore, Unit No. 7 is in commercial operation for more than ten years as on 01.04.2018 and Unit No. 8 is in commercial operation for less than ten years as on 01.04.2018. Accordingly, the Commission finds it appropriate to consider the capacity charge of Unit No. 7 and Unit No. 8 as per formula in regulation 6.11.4 (ii) and 6.11.4 (i) respectively of Tariff Regulations.

3.26.4. The Commission now decides to deduct capacity charges to the extent of shortfall in PAF achieved by DPL during FY 2018-19 (upto 31.12.2018). The Commission has admitted the cost under the heads of 'water charges' and 'coal and ash handling charges' considering proportionate cost on actual generation vis-à-vis target generation. Thus, the costs allowed under those heads are not considered for disallowances of capacity charges for not attaining the target PAF. The disallowance of capacity charge is as shown in the Table below:

Table 3-23: Allowable capacity charge for FY 2018-19 (upto 31.12.2018) (Rs. Lakh)

Sl. No.	Particulars	Unit VI	Unit VII	Unit VIII	Total
A	Annual Fixed Charges at normative PAF	3265.36	14579.62	26469.60	
B	Coal and ash handling expenses	0.00	58.19	111.49	
C	Water Charges	0.00	155.16	297.25	
D	Annual Fixed Charges to be considered for PAF factoring (A-B-C)	3265.36	14366.27	26060.86	
E	Normative PAF	69.00%	85.00%	85.00%	
F	Actual PAF	0.00%	33.37%	74.13%	
G	Proportionate Capacity Charge	0.00	5640.03	24394.50	
H	Total Capacity Charge admitted (G+B+C)	0.00	5853.38	24803.24	30656.62
I	Shortfall in Capacity Charge recovery (A-H)	3265.36	8726.24	1666.36	13657.96
Note:					
For Unit VI and VII: $G=D \times F / E$					
For Unit VIII: $G=D \times (0.5 + 0.5 \times F / E)$,					

3.26.5. The amount of capacity charge admitted is Rs.30656.62 Lakh for shortfall in PAF as computed in table above.

3.27. Sharing of Gains with Consumer and Licensees:

The Commission under paragraph 2.18.6 and 2.18.7 has already determined the sharable amount



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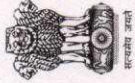


Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

of Rs. 70.31 lakh and Rs 97.14 lakh on account of gains for improved specific oil consumption for Unit No 8 and better distribution loss subject to condition that gain is first to be compensated with the deficit in fixed charge recovery of the generating units in terms of paragraph D of Schedule – 9B of the Tariff Regulations. From the above table, it is seen that there is a deficit in fixed charge recovery of Rs 13657.96 lakh. Thus, the amount mentioned above are compensated with the fixed charge recovery of generating stations and no amount is shared with the consumers and licensees.

3.28. Reliability Incentive:

DPL has claimed that it has achieved system reliability of 99.46% as against 98%, as specified in paragraph 11 of Schedule 10 of the Tariff Regulations and prayed for allowing incentive. DPL has submitted 'Monthly Feeder and Cumulative Feeder Reliability Index' in support of their claim. However, it is observed that the details submitted by DPL is not as per the format specified in regulation 9.7 of West Bengal Electricity Regulatory Commission (Standards of Performance of Licensees Relating to Consumer Services) Regulations, 2010, as amended. In absence of such details, the Commission does not allow any incentive as claimed by DPL.



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

Annexure-3A

SUMMARY OF FIXED CHARGE FOR FY 2018-19 (UPTO 31.12.2018) in Rs. Lakh

Sl. No.	Particulars	Claim						Approved					
		U#6	U#7	U#8	Distribution	Total	U#6	U#7	U#8	Distribution	Total		
1	Employee cost	1423.85	1333.92	1109.10	2262.06	6128.93	1423.85	1333.92	1109.10	2262.06	6128.93		
2	Centrally maintained expenses	759.59	1519.19	1519.19	0.00	3797.97	759.59	1519.19	1519.19	0.00	3797.97		
3	Coal and ash handling expenses	0.00	72.98	139.82	0.00	212.80	0.00	58.19	111.49	0.00	169.68		
4	Water Charges	0.00	350.56	683.26	25.48	1059.30	0.00	155.16	297.25	0.00	452.41		
5	Operation & Maintenance expenses	113.71	2477.31	2526.48	1491.45	6608.95	0.00	1923.75	1183.13	839.48	3946.36		
6	Depreciation	1205.48	3553.37	4877.59	717.82	10354.26	1205.48	3264.44	4480.40	636.64	9586.96		
7	Interest on borrowed capital	0.00	4598.66	18568.11	1332.21	24498.98	0.00	3319.15	13401.77	1332.21	18053.13		
8	Other finance charges	0.00	4.32	1706.91	0.00	1711.23	0.00	4.32	1706.91	0.00	1711.23		
9	Bad Debts written off	0.00	0.00	0.00	4852.88	4852.88	0.00	0.00	0.00	0.00	0.00		
10	Income tax	0.00	901.23	756.59	891.66	2549.48	0.00	0.00	0.00	0.00	0.00		
11	Interest on consumer security deposits	0.00	0.00	0.00	125.94	125.94	0.00	0.00	0.00	0.00	0.00		
12	Reserve for unforeseen exigencies	0.00	262.40	363.71	75.85	701.96	0.00	249.28	345.52	75.85	670.65		
13	Return on Equity	2768.96	4729.62	3970.55	1910.45	13379.57	0.00	4004.02	3275.47	1972.19	9251.68		
14	Interest on working capital	306.14	412.32	859.76	0.00	1578.22	0.00	73.48	156.41	0.00	229.89		
15	Sub-total	6577.73	20215.89	37081.06	13685.80	77560.48	3388.92	15904.90	27586.64	7118.43	53998.89		
16	Less: Miscellaneous other income	0.00	734.95	1407.98	0.00	2142.93	0.00	990.67	657.80	494.46	2142.93		
17	Less: Interest Credit	132.77	391.35	537.19	0.00	1061.31	123.56	334.61	459.24	65.26	982.67		
18	Less: Share of Benefits to be passed on to the consumers for sale to person other than consumers and licensee									4.94	4.94		
19	Net amount	6444.96	19089.59	35135.89	13685.80	74356.24	3265.36	14579.62	26469.60	6553.77	50868.35		



CHAPTER – 4 AMOUNT ADJUSTABLE ON APR

4.1. Based on the foregoing analysis and admissions of the adjustments under different uncontrollable factors / elements of fixed charges and fuel and power purchase cost, the re-determined allowable fixed charges for generation and distribution function as well as fuel and power purchase cost of DPL for FY 2018-19 (upto 31.12.2018) is as shown in the Table below:

**Table 4-1: Aggregate Revenue Requirement for FY 2018-19
(upto 31.12.2018) (Rs. Lakh)**

Sl. No	Particulars	Claimed in APR			Approved		
		Generation	Distribution	Total	Generation	Distribution	Total
1	Fuel Cost	42948.62	-	42948.62	42547.08		42547.08
2	Power Purchase Cost	0.00	11348.87	11348.87	0.00	10075.59	10075.59
3	Capacity Charge for Generation	60670.44	-	60670.44	30656.62		30656.62
4	Fixed charges for Distribution	0.00	13685.80	13685.80	0.00	6553.77	6553.77
5	Allowable Aggregate Revenue Requirement	103619.06	25034.67	128653.73	73203.70	16629.36	89833.06

4.2. The revenue earned by DPL from sale of power to its consumers and WBSEDCL including inter-plant transfer with reference to its split audited annual accounts for the period 01.04.2018 to 31.12.2018 is Rs. 86289.36 Lakh. It is noted from the consumer profile in the Annual Accounts that the revenue income Rs. 86289.36 Lakh includes revenue from sale to IEX i.e sale to persons other than consumer and licensees. Thus, the income from sale to consumers and licensees works out at Rs. 86255.36 Lakh (Rs. 86289.36 Lakh – Rs 34.00 lakh).

4.3. Based on the analyses as done in the foregoing paragraphs, the amount adjustable on the instant case of APR for FY 2018-19 (upto 31.12.2018) works out as under:

**Table 4-2: Net amount recoverable/refundable for FY 2018-19
(upto 31.12.2018) (Rs. Lakh)**

Sl. No.	Particulars	Claimed	Approved
1	Net Revenue Requirement	128653.73	89833.06



Order on FPPCA and APR of DPL for the year 2018-19 (Part-I)

Sl. No.	Particulars	Claimed	Approved
2	Sales revenue	86289.36	86255.36
3	Net amount (+) recoverable / (-) refundable	42364.37	3577.70

- 4.4. The net amount recoverable by DPL for FY 2018-19 (upto 31.12.2018) works out to Rs. 3577.70 Lakh.
- 4.5. DPL is directed to file separate Petition before the Commission regarding the treatment of over/under recovery, if any, as directed in paragraph 4.6 of the Order dated 30.05.2022 in cases no. FPPCA – 78 / 15-16 and APR – 48 / 15-16.
- 4.6. DPL is directed to submit necessary details, justification and documentary evidence through future APR petition with respect to the actual interest paid along with the details of interest on FITL for examination of the Commission and further necessary action, if any.
- 4.7. DPL is to take note of this Order.
- 4.8. The Petitions are thus disposed of.
- 4.9. A copy of the order shall be posted in the website of the Commission.
- 4.10. DPL shall download the copy of the order from website of the Commission and act on it. Certified copy of the order, if applied for, be given to the parties on completion of formalities laid down in the West Bengal Electricity Regulatory Commission (Conduct of Business) Regulations, 2013 as amended and on submission of necessary fees.

Sd/-
(PULAK KUMAR TEWARI)
MEMBER

Sd/-
(MALLELA VENKATESWARA RAO)
CHAIRPERSON

Dated: 02.07.2024

Sd/-
SECRETARY