



दक्षिणांचल विद्युत वितरण निगम लि०

(उ०प्र० सरकार का उपक्रम) CIN- U31200U P2003SGC027460 GSTIN: 09AACCD0695D1ZS

उ० प्र० सरकार का उपक्रम

Ref: DVVNL/Director(Comm.)/ARR/FY24/1stDatagaps/FY22-23/218 Date: 06.04.2023

To,

The Secretary,
Uttar Pradesh Electricity Regulatory Commission
Vibhuti Khand, Gomti Nagar
Lucknow- 226010

Sub: 5th Information Requirement/Discrepancies/Data Gaps in the Petition No. 1948 of 2023 dated 9th January, 2023 of True-Up (FY 2021-22), Annual Performance Review (FY 2022-23), Aggregate Revenue Requirement (FY 2023-24).

Ref: UPERC Email dated 14.03.2023

Dear Sir,

This is with reference to your above-mentioned Email directing submission of replies to 5th Information Requirement/Discrepancies/Data Gaps in the Petition No. 1948 of 2023 dated 09th January, 2023 of True-Up (FY 2021-22), Annual Performance Review (FY 2022-23), Aggregate Revenue Requirement (FY 2023-24) of DVVNL.

The Licensee hereby submits the point-wise replies to the queries/information required by the Hon'ble Commission along with all the Annexures, wherever required. As such the same are up-loaded in soft copies.

Enclosure as above. [06 (1+ 5 copies) + 1- CD (soft copies)]

Yours Sincerely,

(Rajeev Sharma)
Director (Commercial)

o/c

Ref: DVVNL/Director(Comm.)/ARR/FY24/1stDatagaps/FY22-23/218 Date: 06.04.2023

CC: 1. Managing Director, DVVNL.
2. CE, RAU, UPPCL.

(Rajeev Sharma)
Director (Commercial)

o/c

**5th Information Requirement / Discrepancies / Data Gaps in the
Petition Nos. 1948 - 2023
Dated: March , 2023**

of

**True-Up (FY 2021-22), Annual Performance Review (FY 2022-23), Aggregate Revenue Requirement
(FY 2023-24)**

of

- **DVVNL (1948 of 2023)**

- PVVNL has claimed GFA addition (Capitalisation) for FY 2021-22 as Rs. 1953.81 Crore, which comprises addition of Rs. 1883.06 Crore towards 'Tangible Assets' and addition of Rs. 70.75 Crore towards 'Intangible Assets'. However, while computing depreciation (Format: F30) it has considered GFA addition of Rs. Rs. 1883.06 Crore (only 'Tangible Assets'). In this regard, PVVNL to clarification for

- Not considering Rs. 70.75 Crore while computing depreciation;
- Whether PVVNL computes amortisation on 'Intangible Assets';
- If PVVNL computes amortisation on 'Intangible Assets' then where it has claimed.

Response:

It is humbly submitted that the Query does not pertains to DVVNL.

- For FY 2021-22, PVVNL has claimed asset addition for 'Buildings' as Rs. (4.38) Crore. PVVNL to submit justification for claiming '-ve Numbers under asset addition.

Response:

The Query does not pertains to DVVNL.

- It is observed that the submission made in reply of 2nd deficiency regarding interest on loan and computation of interest on loan submitted in Format: F31 does not match with the Audited Accounts of FY 2021-22, detailed computation is shown in the Table below:

Particulars	Opening Loan (Rs. Crore)	Closing Loan (Rs. Crore)	Current Maturity Opening (Rs. Crore)	Current Maturity Closing (Rs. Crore)	Total opening Loan (Rs. Crore)	Total closing Loan (Rs. Crore)	Average Loan (Rs. Crore)	Interest Paid (Rs. Crore)	Interest Rate (Rs. Crore)	Claimed (Rs. Crore)	Variation (Rs. Crore)	Remark
	A	B	C	D	E=A+C	F=B+D	G=Avg.(E,F)	H	I=H/G*100	J	K	
DVVNL	19696.47	18749.33	2045.96	2753.47	21742.43	21502.80	21622.61	2079.53	9.62%	7.57%	2.04%	
MVVNL	15899.01	15761.74	1662.83	2261.52	17561.84	18023.25	17792.55	1671.05	9.39%	9.30%	0.09%	
PVVNL	11037.25	9365.53	1426.51	1883.89	12463.76	11249.42	11856.59	1447.74	12.21%	10.35%	1.86%	
PuVVNL	25177.98	24779.86	2318.46	3596.62	27496.44	28376.49	27936.46	2684.97	9.61%	8.20%	1.42%	
KESCO	2307.81	2446.31	240.34	329.06	2548.15	2775.37	2661.76	238.78	8.97%	8.98%	-0.01%	

The Petitioners to submit justification for variation as shown above and submit reconciliation with audited accounts in MS-Excel.

Response:

The Petitioner submits revised F-31 after considering interest paid as per Note 23 of the audited accounts, attached as Annexure-I. However, it is submitted that the interest value paid as shown in table above is Rs. 2079.53 Cr is inclusive of Rs 0.3194 Cr finance charges paid by UPPCL on behalf of

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DVVNL. The same has been booked under the head Interest on Secured Loans (REC) in the Balance Sheet. The Petitioner has excluded this amount while claiming the interest paid in FY 2021-22 as such interest value paid as claimed in revised F 31 is Rs. 2079.21. The Hon'ble Commission is requested to kindly consider revised form F-31 enclosed.

4. For PuVVNL, GFA addition (capitalisation) shown in Note - 2 of Audited Accounts is Rs. 2423.92 Crore and same is shown in Note -3 as Rs. 2423.89 Crore, resulting a difference of Rs. 0.03 Crore. PuVVNL to submit justification for variation in capitalisation shown in Note -2 and Note-3 in the Audited Accounts.

Response:

The Query does not pertain to DVVNL.

Additional Submission to abolish "Protective Load and Protective Load Charge"

The Hon'ble Commission in its Tariff Schedule for FY 2022-23 dated 20.07.2022 had provided for the applicability of protective load as under: -

9. PROTECTIVE LOAD AND PROTECTIVE LOAD CHARGE:

Consumers getting supply on independent feeder at 11 kV & above voltage, emanating from sub-station, may opt for facility of protective load and avail supply during the period of scheduled roistering imposed by the Licensee, except under emergency roistering. An additional charge @ 100% of base demand charges shall be levied on the sanctioned protective load (as per Electricity Supply Code, 2005 and its amendments) per month as protective load charge. However, consumers of LMV-4 (A) - Public Institutions will pay the additional charge @ 25% of base demand charges only. During the period of scheduled roistering, the load shall not exceed the sanctioned protective load. In case the consumer exceeds the sanctioned protective load during scheduled roistering, he shall be liable to pay twice the prescribed additional charges for such excess load.

It is submitted that consumers receiving electricity supply from an independent feeder at 11 kV or higher voltage, which creates from a sub-station, have the option to avail of the protective load facility. This facility enables consumers to receive electricity supply during scheduled roistering periods imposed by the Licensee, except under emergency circumstances. As per the Electricity Supply Code, 2005 and its amendments, consumers who opt for this facility shall pay an additional charge equal to 100% of the base demand charges on the sanctioned protective load per month as a protective load charge. However, public institutions classified as LMV-4 (A) shall pay only 25% of the base demand charges as an additional charge.

It is important to note that the protective load charge is only applicable to consumers who opt for the protective load facility. Discom are providing uninterrupted power supply to all rural and urban feeders with industrial loads above 50%, thus protecting them from scheduled roistering. Further all urban feeders are already getting uninterrupted power supply. As a result, the relevance of the protective load charge is no longer applicable.

Therefore, Hon'ble Commission is requested to abolish this clause to prevent any ambiguity regarding the matter.

xxx

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Sr. No.	Source of Loan	Legend	Audited (April to March)-FY 2021-22
1	REC (R-APDRP PART-B)		0
1.1	Opening Balance of Loan	A1	449.8787724
1.2	Addition of Loan during the year	B1	0
1.3	Loan Repayment during the year	C1	62.1604091
1.4	Closing Balance of Loan	D1=A1+B1-C1	387.7183633
1.5	Average Loan Balance	E1=(A1+D1)/2	418.7985679
1.6	Applicable Rate of Interest as on 1st April of the Financial Year	F1	11.82%
1.7	Interest Amount Paid in Rs. Crore	G1	49.51793663
0			0
2	REC (SUB-STATION)		0
2.1	Opening Balance of Loan	A1	21.75209487
2.2	Addition of Loan during the year	B1	0
2.3	Loan Repayment during the year	C1	3.5270028
2.4	Closing Balance of Loan	D1=A1+B1-C1	18.22509207
2.5	Average Loan Balance	E1=(A1+D1)/2	19.98859347
2.6	Applicable Rate of Interest as on 1st April of the Financial Year	F1	11.59%
2.7	Interest Amount Paid in Rs. Crore	G1	2.317026057
0			0
3	REC (R-APDRP PART-B SCADA)		0
3.1	Opening Balance of Loan	A1	319.2717368
3.2	Addition of Loan during the year	B1	0
3.3	Loan Repayment during the year	C1	44.6161682
3.4	Closing Balance of Loan	D1=A1+B1-C1	274.6555686
3.5	Average Loan Balance	E1=(A1+D1)/2	296.9636527
3.6	Applicable Rate of Interest as on 1st April of the Financial Year	F1	9.79%
3.7	Interest Amount Paid in Rs. Crore	G1	29.07504045
0			0
4	SAUBHAGYA		0
4.1	Opening Balance of Loan	A1	463.0148054
4.2	Addition of Loan during the year	B1	0
4.3	Loan Repayment during the year	C1	31.7874041
4.4	Closing Balance of Loan	D1=A1+B1-C1	431.2274013
4.5	Average Loan Balance	E1=(A1+D1)/2	447.1211033
4.6	Applicable Rate of Interest as on 1st April of the Financial Year	F1	11.03%
4.7	Interest Amount Paid in Rs. Crore	G1	49.32472687
0			0
5	PFC (R-APDRP)		0

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