

**26. Monthly merit order may be furnished along with variable cost (Rs./kWh) with plant wise net generation on monthly basis for the FY 2018-19.**

**Petitioner Response**

The Petitioner hereby submits that the details related to Merit Order along with variable cost has already been submitted via response to data Gaps dated 06<sup>th</sup> December 2019. Further, month and plant wise net generation/schedule/entitlement is hereby submitted separately as **Appendix 26 (in soft copy)** along with this response.

**39. Monthly merit order may be furnished along with variable cost (Rs./kWh) with plant wise net generation on monthly basis for the FY 2019-20.**

**Petitioner Response**

The Petitioner hereby submits that the details related to Merit Order along with variable cost has already been submitted via response to data Gaps dated 06<sup>th</sup> December 2019. Further, month and plant wise net generation/schedule/entitlement is hereby submitted separately as **Appendix 39 (in soft copy)** along with this response.

**43. Table 13 – Under Open Market Purchase, Power is procured through Traders i.e. PTC, TATA energy trading etc. The breakup details of energy cost and commission for the same paid to PTC (IEX), PTC (short) and TATA energy trading are to be provided.**

The Petitioner hereby submits the details of Open Market Purchase in the table below:

S. No.	Name of the Source	Unit Purchase	Unit sold	Energy rate (Rs/KWh)	Energy Cost (Rs.Cr)	Commission Rate (Rs.Kwh)	Commission Cost (Rs.Cr)	Total Cost (Rs.Cr)	Average rate (Rs./Kwh)
1	PTC IEX Net	2620.7	218.21	4.60	1105.13	0.03	79	1184.13	4.63
2	PTC Short Term	250.38		5.66	141.80	0	0	141.798	5.66
3	Tata	91.06		4.03	36.71	0	0	36.710	4.03

**56: Month Wise dumped revenue billed data of all consumers consolidated to the entire DISCOMs may be provided in soft copy for validation purpose**

**Response:** The Petitioner hereby submits that it has laid its best efforts to provide consumer wise data, however, on account of issues of pertaining to size of the data, structural set up and other technical restrictions the same could not be extracted to its fullest extent. The Petitioner is willing to extend its full support in validation of the said information and the same can be done by paying a visit to the Petitioner’s IT Centre.

**57. Table 32: Capital Grant/Subsidy is shown as Rs 710 Crores. The amount needs to be clarified along with letter of support provided by the Government including subsidy towards consumers, capital subsidy and for compensation of additional power purchase and reason for non- adjustments of advance subsidy year on year**

**Petitioner Response:**

The Petitioner hereby submits that Capital Grant/Subsidy of Rs 710 Crores represents subsidy on account of AT&C losses depicted in Table 32 of the Tariff Petition. It is OFR from the State Government for compensation of additional power purchase. The same has been booked under “Share Application Money-Pending Allotment”. Details of the same is being annexed vide **Appendix 57(1) & 57(2) (all in soft copy)**. Further the subsidy of Rs 710 crores is booked under Share Application Money-Pending Allotment, hence no question of adjustment or non-adjustment of the said subsidy arises.

**59. What is grant received under “OFR” for FY 2018-19 may be provided. Copy of sanctioning letter of State Government may be furnished.**

**Petitioner Response:**

The Petitioner hereby submits that the copy of the letter from Govt. sanctioning OFR amount for FY 2018-19 is being submitted separately as **Appendix 59 (in soft copy)** to this submission.

**P. A&G Expenses**

**77. Reason for increase in A&G expenses**

**Petitioner Response:**

The Petitioner hereby submits that increase in Metering & Billing expenses is on account of the following:

Particulars	FY 19	FY 18	% increase	Reason
Meter reading & Billing	Rs 33.82 Crores	Rs 12.25 Crores	176.08%	Meter reading and Billing expenses increased due to increase in consumer base mainly in domestic and KJ under Saubhagya Scheme. Another reason for increase in meter reading and billing expenses is due to increase in rates payable to the agencies working in urban area. Supporting documents is enclosed in <b>Appendix 77(1), 77(2) &amp; 77(3) (all in soft copy)</b> .

## Response to Data Gaps – True Up Petition for FY 19, APR FY 20 & ARR FY 21 | SBPDCL

Further, the Petitioner wants to submit that the billing has increased by 24% in FY 19 over FY 18. Collection has also increased by 89% by way of collection done by Agency and RRF. The details are as follows:

Duration	Total Billing	Collection (Rs Crores)		
		Agency	RRF	Total
FY 18	3.25	45.97	80.31	126.29
FY 19	4.04	157.62	81.16	238.78
% Increase	24%	243%	1%	89%

### A. Interest on Security Deposit

#### 84.Details for interest passed on to the consumers.

##### Petitioner Response:

The Petitioner hereby submits that it has considered Interest on security deposit as per audited accounts which is based on data collected from field offices of the Petitioner. The Commission may consider the amount of Rs 10.43 Crores as per its own calculation. The same is enclosed in **Appendix 84 A, 84 B, 84 C, 84 D and 84 E (all in soft copy)**.

#### 89.(b) Category wise/Month wise subsidy receivable from Government and subsidy actually received category-wise/month-wise for FY 2018-19 and FY 2019-20 (till September 2019).

The Petitioner has provided details category wise subsidy consolidated at the level of DISCOM for FY 2018-19 and FY 2019-20 category wise month wise in **Appendix 89 (b) (in soft copy)**.

### O&M Norms (Employee and A&G Expenses)

#### 92.Norms for A&G expenses.

##### Petitioner Response:

The Petitioner hereby submits the following norms for A&G expenses:

Particulars	2016-17	2017-18	2018-19
A&G expenses (A1)	64.06	84.1	130.04
No of consumers (A2)	3626	4285	5400
No of employees	9159.00	9272.00	10152
Norms per 1000 consumers	0.018	0.02	0.024
Norms per employee	0.007	0.009	0.013