

1 Issue - 3 and Issue - 36: Sales to DFs Input energy to DF in FY 2018.19.

a. The sales to DF for April 2018 and May 2018 are shown as 75.34 MU whereas the input energy is accounted from April 2018 to 4th July, 2018 as 213.92 MU. Therefore, the sales to DF for June 2018 and 01.07.2018 to 04.07.2018 may be provided to arrive at correct energy sales and losses in DF area. Further, Input energy to DF is shown as 279.04 MU in Table_ 7 of Petition and the amount billed is shown as Rs. 166.77 Crore in Table-31 of petition.

On verification of the invoices raised to DF from April 2018 to July 2018 (upto 4th), the Input energy is observed to be 213.92 MU and the amount billed as Rs. 155.97 crore. Correct input energy and amount billed in FY 2018-19 for Gaya DF may be provided.

Petitioner Response

The Petitioner hereby submits that post termination of DF Agreement on 04.07.2018, based on the last bill data month of DF Gaya i.e. May 2018, the Petitioner carry forwarded the billing to the consumers of the erstwhile DF area of Gaya. This has already been incorporated in Petitioner’s sales figure.

The Petitioner also requests that the Hon’ble Commission may consider the input energy to the DF Gaya and amount billed in FY 2018-19 as per the submitted Invoice for the DF Gaya.

1 (b) The monthly Invoices exhibit that huge amount on account of DPS is outstanding. The following details may be provided.

- **DPS amount at the beginning of FY 2018-19**
- **DPS amount collected during the FY 2018-19**
- **DPS amount pending realisation as termination date of MoU**

Petitioner Response

Financial Year	Opening Balance (in INR)	DPS collected (in INR)	DPS pending on termination date of MOU (in INR)
FY 2018-19	3,17,64,766	9,31,89,623	4,24,30,226

2 Issue - 5: No. of consumer for FY 2018-19.

2 (a) The expected revenue for fixed charges / demand charges from the consumers of erstwhile Gaya DF area after termination of MoU, how accounted and where it is considered in the Revenue billed for FY 2018-19.

Petitioner’s Response:

The Petitioner submits that the Fixed charges and the Energy charges for the Gaya DF are calculated as on the date of termination of the DF. The total energy sales are calculated as on

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the date of termination of DF i.e., on 04-07-2018, but the number of consumers and the connected load is as on 31-03-2019.

2 (b) The category-wise number of consumers and connected load shown for Gaya DF area vide Issue-I and Issue -2 are as on which date i.e. as on date of termination on 04-07-2018 or otherwise may be clarified.

Petitioner Response

The Petitioner hereby submits that data given for number of Consumers and connected load for Gaya DF vide issue 1 and Issue -2 are as per May 2018 Billing Done by erstwhile DF Gaya.

3. Issue – 7, 8 & 9 : Actual Nos. of consumer, Sales & connected load added in H-1 of FY 2019-20.

Petitioner Response:

The petitioner hereby submits that the number of consumers, connected load and the energy sales are as mentioned in audited accounts of FY 2018-19. These figures include the final figures of the Gaya DF. The following table depicts the addition of number of consumers, connected load and the energy sales for H1 of FY 2019-20.

Particulars	FY 2018-19	FY 2019-20 (April-Sept)	Addition
Consumers	5,400,462	5,618,823	218,361
Connected Load	8,690,528	9,056,443	365,915
Energy Sales	10,586	6,248	-

It is further clarified to the honorable commission that the projection for the number of consumers, connected load and the energy sales for FY 2019-20 (RE) and for FY 2020-21 doesn't include the DF figures.

5. Issue-32 : Actual Power Purchase for FY 2019-20 (from April 19 to June 19).

Petitioner Response

The Petitioner hereby submits that the actual power purchase is shown below:

Sr. No	Particulars	Source	Capacity	Weighted Average for Bihar		Plant Load Factor (%)	Auxiliary Consumption (%)	SBPDCL Net (MUs)		
				MW	%			Average	Apr-19	May-19
				20	4					
I	Central Generating Stations		18,834	6,902				980	1,039	968
1	FSTPP I & II	Thermal	1,600	502	31%	77%	8%	123	132	116
2	FSTPP III	Thermal	500	133	27%	67%	8%	27	35	8

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Sr. No	Particulars	Source	Capacity	Weighted Average for Bihar		Plant Load Factor (%)	Auxiliary Consumption (%)	SBPDCL Net (MUs)		
				MW	%			Average	Apr-19	May-19
				20	4					
3	KHSTPP I	Thermal	840	352	42%	79%	8%	100	103	105
4	KHSTPP II	Thermal	1,500	75	5%	79%	8%	21	19	24
5	Barh Stage II	Thermal	1,320	1,198	91%	84%	8%	407	413	388
6	Nabinagar (BRBCL) Unit I - III	Thermal	750	73	10%	53%	8%	22	19	25
7	Korba	Thermal	500	25	5%	89%	8%	8	9	9
8	Talcher Stage I	Thermal	1,000	412	41%	85%	8%	125	125	114
9	KBUNL Stage II	Thermal	390	292	75%	49%	8%	81	89	85
10	Chuka	Hydro	334	80	24%	65%	1%	26	22	20
11	Rangit	Hydro	60	21	35%	70%	1%	4	6	7
12	Tala	Hydro	1,020	258	25%	44%	1%	9	27	27
13	Teesta	Hydro	510	108	21%	68%	1%	25	40	38
II	State Generating Stations		994	994				55	50	43
1	BSPHC	Hydro	54	54	100%	13%	1%	(0)	(0)	1
2	KBUNL Stage I	Thermal	220	220	100%	49%	8%	55	50	42
III	IPPs		2,250	488				170	170	140
1	GMR	Thermal	1,050	260	25%	80%	8%	95	92	62
2	JITPL	Thermal	1,200	228	19%	85%	8%	76	77	78
IV	Renewables		2,533	2,533				46	41	62
1	M/s Sunmark Energy Projects Limited (Formerly MBCEL)	Solar	10	10	100%	19%	2%	1	1	1
2	M/s Response renewable Energy Ltd, Kolkata.	Solar	10	10	100%	19%	2%	1	1	1
3	M/s Avantika Contractors Ltd., Hyderabad	Solar	5	5	100%	19%	2%	0	0	0
4	M/s Glatt Solutions Pvt. Ltd, Kolkata.	Solar	3	3	100%	19%	2%	0	0	0
5	Alfa Infraprop Pvt. Ltd.	Solar	15	15	100%	19%	2%	1	2	1
6	Udipta Energy & Equipment Pvt. Ltd.	Solar	5	5	100%	19%	2%	0	0	0
7	Azure Power India Pvt. Ltd.	Solar	10	10	100%	19%	2%	1	1	1
8	Welspun Renewables Project - I	Solar	10	10	100%	19%	2%	1	1	1
9	Welspun Renewables Project – II	Solar	15	15	100%	19%	2%	1	1	1
10	Welspun Renewables Project – III	Solar	15	15	100%	19%	2%	1	1	1
11	Acme Cleantech Project (Nalanda)	Solar	15	15	100%	19%	2%	1	1	1
12	Acme Cleantech Project (Magadh)	Solar	10	10	100%	19%	2%	1	1	1

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Sr. No	Particulars	Source	Capacity	Weighted Average for Bihar		Plant Load Factor (%)	Auxiliary Consumption (%)	SBPDCL Net (MUs)		
				MW	%			Apr-19	May-19	Jun-19
				20	4	Average				
13	Solar Energy Corporation of India Ltd., Government of India	Solar	10	10	100%	19%	2%	1	1	1
14	Wind ISTS Scheme Tranche I (PTC) (Green Infra, Inox, Mytrah & Ostro)	Non Solar	200	200	100%	27%	2%	13	18	28
15	Wind ISTS Scheme Tranche II (SECI) (Orange)	Non Solar	100	100	100%	32%	2%	5	10	23
16	New Swadeshi Sugar Mill, Narkataganj	Non Solar	7	7	100%	55%	9%	1	(0)	(0)
17	Hasanpur Sugar Mill, Dalsinghara	Non Solar	10	10	100%	55%	9%	2	1	(0)
18	Bharat Sugar Mills, Sidhwalia, Gopalganj	Non Solar	11	11	100%	55%	9%	4	1	(0)
19	Hari Nagar Sugar Mills, Hari Nagar, West Champaran	Non Solar	11	11	100%	55%	9%	5	(0)	(0)
20	HPCL Biofuels Ltd., Sugauli, East Champaran	Non Solar	20	20	100%	55%	9%	2	(0)	(0)
21	HPCL Biofuels Ltd., Lauria, West Champaran	Non Solar	20	20	100%	55%	9%	1	(0)	(0)
22	Riga Sugar Company Ltd.	Non Solar	3	3	100%	55%	9%	0	(0)	(0)
23	Siddhashram Rice Mill Cluster Pvt Ltd	Non Solar	1	1	100%	80%	9%	0	0	0
24	Bihar Distillers & Bottlers Pvt Ltd	Non Solar	9	9	100%	80%	9%	2	1	1
25	Tirupati Sugar	Non Solar	6	6	100%	55%	2%	1	(0)	(0)
V	Others			-				167	351	439
1	PTC(IEX)			-	0%	0%	0%	70	264	354
2	PTC(Except IEX)			-	0%	0%	0%	81	21	51
3	DB Power			-	0%	0%	0%	8	7	
4	TATA Energy Trading Ltd.			-	0%	0%	0%		58	14
5	Manikaran			-	0%	0%	0%			25
6	NEA			-	0%	0%	0%	-	-	-
7	UI			-	0%	0%	0%	7	0	(4)
VI	Total			10,917				1,418	1,651	1,651

6. Issue – 43: Break-up of open Market Purchase (Energy charge, Commission Charge per unit) to be provided.

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

S.No.	Name of	Unit	Unit	Energy	Energy	Commissi	Commi	Total	Averag
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	the Source	Purchase	sold	Buy rate (Rs/K Wh)	Cost (Rs.Cr)	Buy Rate (Rs.Kwh)	Commission Cost (Rs.Cr)	Cost (Rs.Cr)	Buy rate (Rs./K wh)
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

7. Issue - 46 REC Certificates purchased (Solar or Non-Solar) in FY 2018-19. Cost of each REC (Solar or Non-Solar) and rate per each REC at which procured is to be Provided.

The Petitioner hereby submits the details related to REC in soft copy attached as **Annexure 7 (in soft copy)** to this submission.

8. Issue - 52 Transmission Charges for FY 2019-20

The month-wise charges for PGCIL, POSOCO, BSPTCL, BGCL SLDC for FY 2019-20 (Upto latest month available) may be provided as provided in the Table under Issue 51.

Petitioner Response

The Petitioner hereby submits the details of transmission charges for FY 19-20 (upto latest month available) in the table below:

Rs.	POSOCO	PGCIL	BSPTCL	BGCL	SLDC
Apr-19	1892543	436942619	451044000	173200000	1631377
May-19	1905872	410048571	451044000	173200000	1631377
Jun-19	1905868	377156435	451044000	173200000	1631377
Jul-19	2320917	389088042	451044000	173200000	1631377
Aug-19	2297357	394171494	451044000	173200000	1631377
Sep-19	2244921	618406336	451044000	173200000	1631377

9. Issue - 54: SLDC Deviation

SLDC Deviation is shown as 65.12 MU in Table 7 of Petition. But this is not included in the total. What is this figure may be clarified.

Petitioner Response:

The petitioner hereby submits that our total billed energy is 10586.32 MU only. However, it is noticed that there was double accounting of SLDC deviation charges as it was clubbed with DF category as well. The petitioner hereby request the hon'ble commission may refer the following table for its consideration.

Table 1: Total Energy Sales (in MU) for FY 2018-19

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Category	Approved in APR FY 2018-19	Actual for FY 2018-19
KJ	1100	1155.91
DS-I	2,662.00	2280.43
DS-II	3,523.00	2557.36
NDS-I	54	69.37
NDS-II	1182	922.98
SS-I	13	9.53
SS-II	29	25.73
IAS-I	327	463.22
IAS-II	152	110.95
PWW	127	78.08
LTIS-I	464	210.25
LTIS-II	318.62	129.27
HTS-I	649	628.98
HTS-II	385	421.33
HTS-III	182	163.28
HTSS	790	773.32
RT	579	307.29
SLDC Deviation Charges		65.12
Distribution Franchisee	0	213.92
Total	12536.62	10586.32

10. Issue - 59: OFR Sanction Letter

As stated, in the reply, copy of the letter from Govt. Sanctioning OFR amount for FY 2018-19 may be provided urgently.

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 **Annexure 10 (in soft copy)** to this submission.

11. Issue- 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)**.

12. Issue - 99 Compliance, Directive has not been submitted. The reply provided is incomplete. The Chapter on "Compliance of Directives" may be provided urgently to make the petition in complete shape.

Petitioner Response

The Petitioner hereby submits that it has already submitted its response to compliance to directives for all 17 directives as issued in MYT Order via letter no 323 dated 11/10/2019, letter no 354 dated 19/11/2019 and letter no. 369 dated 28/11/2019. The same was again provided to the Hon'ble Commission by petitioner vide letter no. 105 dated 06.12.2019. in response to the additional clarification raised by the Commission. The same can be considered as a part of compliance of directive.

13) Issue 32 & 100: APR for FY 2019-20

It is stated that power purchase has been considered on 3 months provisional data and for balance nine months has been projected based on first three months of FY 2019-2020 shall be based on actuals of first six months and projections for balance 6 months. Hence, revised power purchase for FY 2019-20 based on first six months actual and projections for next six months shall be submitted for APR or FY 2019-20. The power purchase projected by SBPDCL and NBPDCCL from each source shall be in the ratio of 54:46 as approved by Board.

The Petitioner hereby submits that as mentioned in its Tariff Petition for FY2019-20, has considered power purchase on 3 months provisional data. The balance nine months of power purchase data has been projected based on data as arrived for first three months for FY 2019-20. The Petitioner in response to Compliance of Directive No 15 as issued in MYT Order, has already submitted the provisional power purchase (quantum and cost) for first six months of FY 2019-20 via letter no 323 dated 11/10/2019, letter no 354 dated 19/11/2019 and letter no. 369 dated 28/11/2019. Further, petitioner has already submitted all the power purchase bills via letter no. 356 dated 20.09.2019 to the Hon'ble Commission. Further, by revising the power purchase for six months based on provisional data would eventually result in revising the ARR for FY 2019-20 and eventually for FY 2020-21. This would again lead to revision of gap and tariff proposal. For other expenses, provisional data for first six months of FY 2019-20, was not available at the time of filing of Tariff Petition and needs to be collated from different field offices, which requires much time and effort. The same was also discussed in the Hon'ble Commission kind office in meeting dated 30th October 2019.