



GUJARAT STATE ELECTRICITY CORPORATION LIMITED

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CIN: U40100GJ1993SGC019988

Ref: GSECL/GM (F&A)/Comm./2021-22/ARR/2149

Dated:-.06.02.2023

By Speed Post

To,
The secretary,
Gujarat Electricity Regulatory commission
6th Floor, GIFT ONE,
Road 5-C, Zone-5, GIFT CITY,
Gandhinagar- 382 355

Sub: - Data Gaps in Tariff Petition No. 2162/2022 filed by GSECL for True-up for FY 2021-22 and Determination of ARR & Tariff for FY 2023-24.

Ref: E-Mail dated: - 27-01-2023 received from Assistant director (Tech-1).

Sir,

This has reference to above referred e-mail informing to submit the point wise replies to the Preliminary Data Gaps observed by Hon'ble Commission in the Petition No. 2162/2022 filed by GSECL for True-up for FY 2021-22 and Determination of ARR & Tariff for FY 2023-24.

The Point wise compliance is as under: -

True Up for F.Y. 2021-22: -

Query:-

The Petitioner is required to provide the SLDC certificate for station-wise actual plant availability for FY 2021-22.

Reply: -

The SLDC certifies the Station-wise Actual Availability for all Stations through State Energy Account (SEA). Copy of relevant pages of SEA for F.Y. 2021-22 are attached herewith as **(Annexure-1)**.

Query:-

It has been observed that PAF of KLTPS-3, KLTPS-4 & BLTPS was quiet low during FY 2021-22, while PLF is on higher side during the said period. The Petitioner is required to provide clarification regarding the same.

Reply: -

The detail of PAF & PLF of KLTPS-3, KLTPS-4 & BLTPS Unit-1&2 is as under: -



Sr. No.	Name of Power Station	Plant Availability Factor (% PAF)	Plant Load Factor (% PLF)
1	KLTPS-3	69.70	70.02
2	KLTPS-4	6.59	7.47
3	BLTPS-I&2	34.84	37.82

As regards to the observation seeking clarifications regarding higher PLF than PAF in the case of above stations, it is to clarify that, PAF is calculated based on Declared Capacity (DC-net generation-ex-bus) on normative Auxiliary Power Consumption (APC) . The reasons for lower PAF are high APC considered for DC against normative APC of the station/unit as well as constraints in achieving rated load. Whereas, the PLF is based on actual gross generation against installed capacity. Hence actual PLF achieved is more than the PAF.

Query:-

The Petitioner is required to provide clarification that though energy charges of certain plants (like Wanakbori 7 TPS*, Gandhinagar (3-4), etc.) are higher, the PLF (%) for such stations was higher than stations with lower energy charges for FY 2021-22.

Reply: -

As regards to the observation seeking clarifications regarding higher PLF of the stations having higher energy charges than the stations having lower energy charges, it is to clarify that, the Plant Load Factor (PLF) depends on the availability of unit, schedule given by SLDC as per the merit order dispatch, fuel mix and actual generation during the real time operation. GSECL stations generate energy as per the schedules received from SLDC as per merit order dispatch principle. Actual energy charges are worked out for truing up is based on the actual fuel cost incurred, coal blending ratio, weighted average GCV of the coal and station heat rate during the whole financial year. In most of the other power stations, the reason of lower PLF is attributable to less PAF even though the energy charges are lower than other stations.

Query:-

The petitioner is required to provide month-wise fuel stock position along with landed price and GCV of fuel and methodology adopted for allocation of fuel amongst different stations for FY 2021-22.

Reply: -

1. Monthly Fuel stock position in terms of opening balance, addition during the month, utilization during the month and closing balance are submitted as **(Annexure-2)**
2. Detail showing weighted avg. Gross calorific value and weighted avg. price of Fuel of respective month with bifurcation of Indigenous coal, Washed coal, imported coal & lignite are attached as **Annexure-3**



3. Detail showing weighted avg. Gross calorific value and weighted avg. price of gas for respective month is attached as **Annexure-4**
4. Methodology adopted for allocation of Fuel amongst different Units of Generating station: -
 - GSECL submits the coal requirements to the SECL & WCL as per FSA. Based on availability of coal & production matrix, coal companies sanctions the coal supply program. According to the coal availability and empty racks made available by Railways, SECL & WCL supply the RoM coal by Rail mode. According to the coal availability with power stations, coal is being used by respective power station for Generation.

Query:-

The Petitioner is required to provide details of amount paid (if any) towards penalty lower off-take of coal OR credit received on account of grade slippage.

Reply: -

GSECL has not paid any Penalty amount towards lower off-take of coal during F.Y. 2021-22. However, numbers of credits have been received from SECL on account of grade slippage on the basis of claims made by different Power Stations. Details of credits received by different power stations are as under. Moreover, it is to confirm that the effect of such credits is given to the consumption rates during respective month by individual power station.

Power Station	Credit Received for Ind. Coal (Rs. Crores)	Credit Received for Wash. Coal (Rs. Crores)	Total (Rs. Crores)
Wanakbori	20.36	14.30	34.66
Gandhinagar	2.75	1.11	3.86
Ukai	10.88	-	10.88
Total	33.99	15.41	49.40

Query:-

The Petitioner is required to provide detailed bifurcation of O&M cost, as per Audited Accounts O&M cost INR 1,417 Crore while the Petitioner has claimed for INR 1,510 Crore for FY 2021-22.

Reply: -

As directed, the detailed bifurcation of O&M cost of Rs. 1510.00 Crores claimed in the petition for F.Y. 2021-22 is attached as **Annexure-5**.



Query: - Income Tax

Submit Tax Challans. Also clarify about whether any income tax refund was received for FY 2021-22.

Reply: -

The copies of the Income Tax challans for F.Y. 2021-22 are attached herewith as **Annexure-6**. Further to submit that no income tax refund was received by GSECL during F.Y. 2021-22.

Query: - Interest and Finance Charges

Petitioner should provide detailed computation of weighted average interest rate on actual loan portfolio FY 2021-22 along with the supporting loan documents for each loan portfolio, date of repayment during the year, if any, in accordance with the GERC MYT Regulations, 2016, as per the attached format

Reply: -

The computation of weighted average interest rate on actual loan portfolio FY 2021-22 for each loan portfolio, date of repayment during the year, if any, in accordance with the GERC MYT Regulations, 2016, is submitted herewith in the required format along with the format showing the weighted average rate of interest separately for terms loans and working capital loans (**Annexure-7**)

Moreover, it is also to submit that, in the present case, the last available weighted average rate of interest for actual loan in 8.18% which is weighted average rate of interest approved by the Hon'ble Commission for FY 2020-21 in its Order in Case No. 2025 of 2021 dated 30th March, 2021 has been claimed by GSECL as per the provisions of the MYT Regulation 38.5.

Query: - Depreciation:

Regarding the computation of depreciation, Petitioner should clarify whether the depreciation on assets, which are already depreciated up to 90% of GFA has been considered.

Reply: -

It is clarified that, in computation of depreciation the depreciation on assets, which are already depreciated up to 90% of GFA has not been considered. Moreover, the details of Power station wise assets and depreciation is submitted herewith as **Annexure-8 (Fixed Asset Register-in soft copy)**.

Query: - Annual Accounts

Please submit CAG Certificate in respect to Annual Accounts for FY 2021-22



Reply: -

The CAG certificate in respect to Annual Accounts for F.Y. 2021-22 is attached herewith.
(Annexure-9)

This is for your kind information and needful please.

Sd/-
(K. H. Chadderwala)
General Manager (F&A)

Encl. - As above