

BEFORE THE JHARKHAND ELECTRICITY REGULATORY COMMISSION

CASE NO. _____ of 2020

IN THE MATTER OF:

Petition for approval for Annual Performance Review of FY 2020-21 for 1 X 63MW Coal Fired CFBC Thermal Power Project under Section 61 & 62 of the Electricity Act 2003.

AND

IN THE MATTER OF:

Inland Power Ltd

...Petitioner

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&

Jharkhand Urja Vikas Nigam Ltd. (JBVNL), Ranchi is the “Respondent” to the Petition.

Details of enclosures:

1. Annexure No. 1 – Data formats for APR of FY 2020-21
2. Annexure No. 2 – Certificate from banks highlighting the interest rates charged to IPL
3. Annexure No. 3 – Interest certificates for term loan & Working capital loan paid to various banks
4. Annexure No. 4– Auditors certificate on month wise operational performance parameters
5. Annexure No. 5 – Sample bills for secondary oil bought
6. Annexure No. 6 – Sample bills for primary fuel bought
7. Annexure No. 7 – Sample bills for transportation cost of fuel bought
8. Annexure No. 8 – Auditors certificate for fuel consumed with GCV and with rate.
9. Annexure No. 9 – Auditor certificate for Source wise monthly primary fuel purchased and actual receipt with Transit loss for FY 2020-21
10. Annexure No. 10 - Details of Restrictions imposed by SLDC

Facts of the case:

1. Inland Power Limited (IPL) has set up a 63 MW thermal power plant based on CFBC technology in Gola, District Ramgharh, Jharkhand. The commercial operation date of first unit of 63 MW is 21st May 2014.
2. IPL signed a Power Purchase Agreement (hereinafter also referred to as “the PPA”) with Jharkhand State Electricity Board (now Jharkhand Urja Vikash Nigam Limited or “JBVNL”) on February 23, 2012 for supplying 35 MW of 63 MW from Stage 1 of the Project on long term basis. Subsequently, IPL signed a supplementary PPA with JSEB (now JBVNL) on April 22nd, 2013 for purchase and sale of entire quantity of power to be generated from Unit 1 of 63MW inclusive of quantity mentioned in earlier Principal PPA. The agreements were signed in line with the MOU with Jharkhand Government.
3. Since the CoD of IPL’s unit 1 on May 21, 2014, IPL has been filing MYT petitions, petitions for True Up and Annual Performance Review over the subsequent years.
4. In view of the above, IPL in accordance with the provisions of Section 62 of the Electricity Act, 2003 and under the JSERC (Terms and Conditions for Determination of Generation Tariff) Regulations, 2015 is submitting this APR Petition for FY 2020-21.

PRAYER TO THE HON'BLE COMMISSION

The Petitioner respectfully prays that the Hon'ble Commission may:

- Approve the numbers for the Annual Performance Review Petition for FY 2020-21 as discussed in this Petition
- Condone any inadvertent omissions/ errors/ rounding off differences/ shortcomings and permit IPL to add/ change/ modify this filing and make further submission as may be at a future date; and
- Pass such further and other orders, as the Hon'ble Commission may deem fit and proper, keeping in view the facts and circumstances of the case.

The Petitioner further declares that the subject matter of the petition has not been raised by the Petitioner before any other competent forum, and that no other competent forum is currently seized of the matter or has passed any orders in relation thereto.

Place:

Date: 07 September 2022

On behalf of **Inland Power Limited**

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List of Abbreviations

Abbreviation	Definition
A&G	Administrative and General
ARR	Aggregate Revenue Requirement
COD	Commercial Operation Date
CFBC	Circulating Fluidized Bed Combustion
FY	Financial Year
GCV	Gross Calorific Value
GFA	Gross Fixed Assets
GoI	Government of India
JSERC	Jharkhand State Electricity Regulatory Commission
kCal	Kilocalorie
Kg	Kilogram
kWh	Kilowatt-hour
MAT	Minimum Alternative Tax
ml	Milliliter
MT	Million Tonnes
MUs	Million Units
MW	Megawatt
NAPAF	Normative Annual Plant Availability Factor
O&M	Operations and Maintenance
PLF	Plant Load Factor
PPA	Power Purchase Agreement
R&M	Repair and Maintenance
RoE	Return on Equity
Rs	Rupees
SBI	State Bank of India
SERC	State Electricity Regulatory Commission
SLM	Straight Line Method

1 Background

1.1 Profile of Inland Power limited

1.1.1 Inland Power Limited (“IPL”) is promoted by the Inland Group which was founded in 1970s. IPL had been originally incorporated on 22nd June, 1993 as a Private Limited Company and was subsequently converted to a Public Limited Company on 3rd April, 2008 as Inland Power Ltd.

1.1.2 IPL has set up one unit of the project of 2x63 MW thermal power plant based on CFBC technology at Inland Nagar near Gola, District Ramgarh, Jharkhand as an Independent Power Plant (IPP). Stage one has been commissioned and its operational from 21st May 2014.

1.1.3 The key details of the power plant are provided in table below:

Table 1 : Project details

SN	Parameter	Details
1	Name of power station	Inland Coal fired CFBC Thermal Power Plant
2	Project Capacity	1 x 63 MW
3	Location	Inland Nagar near Gola, District Ramgarh, Jharkhand
4	Nearest Railway site	Gola, 5 km from the project site
5	Nearby highway	Ramgarh Bypass, NH – 23 at a distance of 1 km.
6	Financial closure of the Project	12 th Aug 2011
7	Fuel	Coal, Coal rejects & Dolochar
8	Technology	Circulating Fluidized Bed Combustion (CFBC) Technology
9	Fuel supplier	CCL, Tata Steel & Various sources
10	Substation Connectivity	132 kV level, JBVNL sub-station at Sikidiri
11	Water	Damodar Valley Corporation for drawing water of total quantity of 2.71 MGD
12	Commissioning Date	21 st May 2014
13	JSERC Tariff order for provisional approval of tariff	27 th May 2014
14	Capital cost approval, True-up FY 2014-15 & MYT order for FY 2016-21	16 th May 2017
15	Order for True-up of FY 2015-16	19 th March 2018
16	Order for True-up of FY 2016-17 and FY 2017-18	01 st October 2019
17	Order for True-up of FY 2018-19	22 nd September 2020

1.1.4 A Power Purchase Agreement (PPA) has been signed between IPL and JSEB (now JBVNL) on 23-Feb-2012 and further a supplementary to the PPA was signed on 22nd April 2013 whereby IPL will sell the entire capacity of 63 MW from 1st unit to JBVNL. Out of 63 MW JBVNL will purchase 12% of total power generation at

variable cost only and the balance 88% at the tariff determined by JSERC.

1.2 About the Petition

- 1.2.1 Pursuant to the enactment of the Electricity Act, 2003 (EA 2003), as per Section 64 (1) of Act, a generating company intending to sell power to a Distribution Licensee is required to file an application for determination of tariff to the Appropriate Commission. As IPL is selling power to the JBVNL, the Appropriate Commission in this case is the Hon'ble Jharkhand State Electricity Regulatory Commission ("JSERC" or "Commission").
- 1.2.2 The Hon'ble Commission has provided vide notification dated 10th November 2015, JSERC (Terms and Conditions for Determination of Generation Tariff) Regulations, 2015 or "JSERC Regulations, 2015". The Regulations are applicable for approving tariff during the control period starting FY 2016-17.
- 1.2.3 The Petitioner is seeking approval for Annual Performance Review Petition for FY 2020-21 for its 1 x 63MW CFBC thermal power plant.

2 Annual Performance Review Petition for FY 2020-21

2.1 Regulatory provisions

2.1.1 The Hon'ble Commission in its Regulations, 2015 has stated the following on review of various costs under the regulations in sections 14.1, 14.2 and 14.3, which have been duly considered by IPL for this submission

3 Fixed Cost of the Plant

3.1 Annual fixed cost for FY 2020-21

3.1.1 The fixed cost of the power plant has been approved by JSERC via Case No. 06 of 2016 dated 16th May 2017 for the control period starting FY 2016-17.

3.1.2 For the computation of the fixed components, the Petitioner has considered regulation 8.2 of the JSERC Tarff regulations. The following components of fixed cost have been considered for True-up of the tariff for the power plant and have been set out in the following sections of this petition:

- (a) Return on Equity
- (b) Interest on Long Term Loan
- (c) Depreciation
- (d) Interest on Working Capital
- (e) Operation and Maintenance Expenses

3.2 Return on Equity (ROE)

3.2.1 The Hon'ble Commission in its regulations 2015 has considered the pre-tax return on equity at 15.5% of equity capital.

3.2.2 The Petitioner has determined the Return on Equity (RoE) at a rate of 15.5% in accordance with the JSERC Regulations, 2015 on the equity base of Rs. 99.58 Cr after reduction of equity component of Rs. 2.32 Cr corresponding to common cost of Unit -2 which had been priorly approved by Hon'ble JSERC vide True Up Order for FY17-18 dated 1st October 2019. It is submitted that the actual tax paid will be claimed separately during True Up for FY2020-21.

Table 2 : Computation of Return on Equity

Particulars	Unit	FY 2019-20	2020-21 (April to Sept)	2020-21 (Oct to March)	2020 - 21
		Approved	Actual	Estimated	Estimated
Opening Equity	Rs Cr.	101.90	99.58	99.58	99.58

Particulars	Unit	FY 2019-20	2020-21 (April to Sept)	2020-21 (Oct to March)	2020 - 21
		Approved	Actual	Estimated	Estimated
Addition	Rs Cr.	0	0	0	0
Closing Equity	Rs Cr.	101.90	99.58	99.58	99.58
Rate of Return on Equity	%	15.50%	15.50%	15.50%	15.50%
Applicable MAT Rate	%	20.39%	Will be claimed at Actuals during True Up for the year		
Net ROE rate	%	19.47%	15.50%	15.50%	15.50%
Return on Equity	Rs Cr.	19.84	7.72*	7.72*	15.43*

* The actual tax paid will be claimed separately during True-up of FY 2020-21

3.3 Interest and Financing charges on Loan Capital

3.3.1 The Petitioner has considered actual loan portfolio to arrive at the estimated interest and finance charges for FY 2020-21. The source wise loan details are given in Form F8 as part of the data formats attached as Annexure 1. The table below summarizes the interest on loan claimed for FY 2020-21.

Table 3: Computation of Interest on long term Loan in Rs. Cr

Particulars	FY 20-21	FY 2020-21	FY 2020-21	FY2020-21
	Approved	(April to Sept) Actual	(Oct to March) Estimated	Estimated
Opening Balance for long term Loans	166.27	156.26	147.67	156.26
Additions during the Year	0	3.41	0	3.41
Repayments during the Year	15.6	12.00	12.00	24.00
Closing Balance for long term Loans	150.67	147.67	135.67	135.67
Rate of interest	12.16%	10.96%	10.96%	10.96%
Interest on Loan	19.28	8.33	7.76	16.09
Finance / Bank Charges	0	0.00	0	0.00
Total interest on loan and finance charges	19.28	8.33	7.76	16.09

3.3.2 We are submitting the following details related to interest on long term loan

- Annexure 2 – Letters from banks highlighting the interest rates charged by IPL
- Annexure 3 – Interest certificates for term loan & working capital loan paid to various banks

3.4 Depreciation

3.4.1 The Hon'ble Commission in its Regulations, 2015 has considered following principals for determination of depreciation in sections 7.28, 7.31& 7.32

3.4.2 The depreciation has been computed as per the depreciation rates provided in the Appendix-I of the JSERC Tariff Regulations, 2015. The formats attached with the petition provide the details of calculation of depreciation based on the applicable rates and is attached as Annexure 1 – Data formats as per JSERC Tariff Regulations 2015

3.4.3 The Opening & Closing Gross Block of Assets and the depreciation for FY2020-21 has been considered based on the Closing Block of Assets and depreciation for FY2019-20 as submitted in the True Up Petition for FY2019-20. The depreciation amount computed is provided in the table below:

Table 4: Computation of Depreciation

Particulars	Unit	FY 20-21 Approved	FY 2020-21 (April to Sept) Actual	FY 2020-21 (Oct to March) Estimated	FY2020-21 Estimated
Opening Gross block	Rs. Cr	341.24	335.11	335.11	335.11
Additional Capitalization	Rs. Cr	-	0.00	0.00	0.00
Closing Gross block	Rs. Cr	341.24	335.11	335.11	335.11
Deprecation due to Additional Capitalization	Rs. Cr	-	-	0.00	0.00
Total Depreciation	Rs. Cr	15.60	8.60	8.60	17.20

3.4.4 The Petitioner prays to the Hon'ble Commission to allow the depreciation. The petitioner submits that the actual depreciation and addition to the Fixed assets during FY 20-21 shall be submitted duly at the time of True-up for approval of the Commission.

3.5 Interest on Working Capital

3.5.1 The Petitioner has claimed normative interest on working capital as shown in the table below. The detailed calculation for computation of normative interest on working capital is shown as part of the data formats.

Table 5: Interest on working capital

Particulars	Unit	FY 20-21 Approved	FY 2020-21 (April to Sept) Actual	FY 2020-21 (Oct to March) Estimated	FY2020-21 Normative
Interest on Working Capital	Rs. Cr.	6.10	3.28	3.27	6.55

3.6 Operation and Maintenance Expenses (O&M Expenses)

- 3.6.1 The Petitioner submits that the actual and estimated O&M expenses have varied from the number approved by the Hon'ble Commission. The reasons for this variation is change in fuel mix, increase in ash handling and disposal charges due to high ash generated due to change in fuel mix.
- 3.6.2 The comparison of approved and estimated O&M expenses for FY 2020-21 are shown in the table below with a prayer to allow the estimated O&M expenses for FY 2020-21

Table 6: O&M expenses

e	Unit	FY 20-21 Approved	FY 2020-21 (April to Sept) Actual	FY 2020-21 (Oct to March) Estimated	FY2020-21 Estimated
Normative O&M expenses	Rs. Cr.	21.72	11.81	14.64	26.45
Total Expenses	Rs. Cr.	21.72	11.81	14.64	26.45

3.7 Total Fixed Cost

- 3.7.1 The recovery of capacity charges is to be done as per regulation 8.10 to 8.11 of the JSERC regulations, 2015.
- 3.7.2 Based on the above discussion, the total fixed charges for FY 2020-21 has been estimated. The Hon'ble Commission is requested to approve the estimated fixed charges as discussed in the table below:

Table 7 : Computation of Fixed cost

Particulars	Unit	FY 20-21 Approved	FY 2020-21 (April to Sept) Actual	FY 2020-21 (Oct to March) Estimated	FY2020-21 Estimated
O&M cost	Rs Cr.	21.72	11.81	14.64	26.45
Depreciation Charge	Rs Cr.	15.60	8.60	8.60	17.20
Interest on working capital	Rs Cr.	6.10	3.28	3.27	6.55
Interest & finance Charges	Rs Cr.	19.28	8.33	7.76	16.09
Return on Equity	Rs Cr.	19.84	7.72	7.72	15.43
Annual Fixed Cost	Rs Cr.	80.62	39.74	41.99	81.73

*The actual tax paid will be claimed separately during True-up of FY 2020-21, kindly refer explanation in table 2 regarding computation of ROE.

4 Performance targets

4.1 Regulatory provisions

- 4.1.1 The Hon'ble Commission had set performance targets for controllable parameters under Tariff Regulations 2015 under section 6.11, 6.12 & 6.13.
- 4.1.2 The estimated performances on these controllable parameters are discussed below. Also, the report on month wise operational performance parameters are attached as Annexure 4

4.2 Gross Station Heat Rate (SHR)

- 4.2.1 The Hon'ble Commission had set a SHR target of 2902 kCal/kWh for FY 2020-21 as per its order in Case No. 06 and 11 of 2016 dated 16th May 2017. The actual SHR values up to September 2020 are attached as part of submission of operation parameters as attached to the Petition. The SHR is expected to be higher than the normative values due to change in fuel mix, use of fuel with high ash etc. The comparison of the approved and estimated values are shown in the table below.

Table 8: Gross Station heat rate

Particulars	Unit	FY 20-21 Approved	FY 2020-21 (April to Sept) Actual	FY 2020-21 (Oct to March) Estimated	FY2020-21 Estimated
Gross Station heat rate	kCal/kWh	2902	3209.98	2902	3055.99

4.3 Normative Annual Plant Availability Factor (NAPAF)

- 4.3.1 The Hon'ble Commission had set NAPAF of 82.5% for FY 2020-21 as per its order in Case No. 06 and 11 of 2016 dated 16th May 2017. The PAF achieved in first six months upto September 2020 is higher than the approved value and estimated PAF for FY 2020-21 is expected to be higher than the approved value.
- 4.3.2 The PAF for the next six months of FY 2020-21 (Oct 2020 to March 2021) has been estimated at 85% considering the plant shutdown during the period.
- 4.3.3 The approved and estimated numbers are shown in the table below.

Table 9: Normative Annual Plant Availability Factor

Particulars	Unit	FY 20-21 Approved	FY 2020-21 (April to Sept) Actual	FY 2020-21 (Oct to March) Estimated	FY2020-21 Estimated
Normative Annual Plant Availability Factor	%	82.50	91.27	85.00	88.14

4.4 Auxiliary Energy Consumption

- 4.4.1 The Hon'ble Commission had set an Auxiliary consumption target of 10.5% for FY 2020-21 as per its order in Case No. 06 and 11 of 2016 dated 16th May 2017. The auxiliary consumption is higher than the approved in first six months of FY 2020-21 due to several restrictions being imposed by SLDC on a daily basis on the plants. The total number of restrictions imposed by SLDC over the first 6 months of operations were to the tune of 242 details of which are being submitted in Annexure – 10. Further the auxiliary power consumption was also affected due to change in fuel mix, transmission loss etc.
- 4.4.2 The auxiliary consumption for the next six months of FY 2020-21 (Oct 2020 to March 2021) has been estimated at 10.50% which is in line with the auxiliary consumption approved by the Commission for the year.
- 4.4.3 The approved and estimated numbers are shown in the table below.

Table 10: Auxiliary energy consumption

Particulars	Unit	FY 20-21 Approved	FY 2020-21 (April to Sept) Actual	FY 2020-21 (Oct to March) Estimated	FY2020-21 Estimated
Auxiliary energy consumption	%	10.50	11.22	10.50	10.86

- 4.4.4 In view of the above, the Petitioner prays to the Hon'ble commission to approve the estimated auxiliary consumption for FY 2020-21.

4.5 Secondary fuel oil Consumption

- 4.5.1 The Hon'ble Commission had set secondary fuel oil consumption target of 1 ml/kWh for FY 2020-21 as per its order in Case No. 06 and 11 of 2016 dated 16th May 2017. As secondary fuel oil consumption is a controllable parameter as per the JSERC Tariff Regulations 2015, the normative value has been considered for FY 2020-21. The same is shown in the table below.

Table 11 : Secondary fuel oil Consumption

Particulars	Unit	FY 20-21 Approved	FY 2020-21 (April to Sept) Actual	FY 2020-21 (Oct to March) Estimated	FY2020-21 Estimated
Secondary fuel oil consumption	ml/ kWh	1.00	1.00	1.00	1.00

5 Energy Charges

5.1 Fuel Price and Calorific Value

- 5.1.1 As IPL has no fuel linkage, it is procuring fuel from various sources available like:

- E –Auction CIL coal
- Shakti Scheme
- Coal from the forward auctions
- Washery Rejects of CCL
- Rejects from Tata Steel

5.1.2 Based on the availability of coal input the blending ratio of Coal and Coal rejects has changed significantly from the approved figures. The transit loss has been considered at a normative value of 0.8% as per Regulation 8.21 of the Tariff Regulations 2015.

Table 12: Approved and actual fuel details

Particulars	Unit	FY 20-21 Approved	FY 2020-21 (April to Sept) Actual	FY 2020-21 (Oct to March) Estimated	FY2020-21 Estimated
GCV of Coal	Kcal/Kg	4,078.68	3,632.37	3,632.37	3,632.37
GCV of Rejects	Kcal/Kg	1,937.31	2,189.21	2,189.21	2,189.21
GCV of Dolochar	Kcal/Kg	855.39	0	0	0
Weighted average GCV of fuel	Kcal/Kg	3,061.19	2,604.41	2,604.47	2,604.41
Coal	%	54.00%	28.77%	28.77%	28.77%
Rejects	%	43.00%	71.23%	71.23%	71.23%
Dolochar	%	3.00%	0.00%	0.00%	0.00%
Fuel mix	%	54:43:03	28.77:71.23:00	28.77:71.23:00	28.77:71.23:00
Price of Coal	Rs./MT	2,830.32	2,762.56	2,762.56	2,762.56
Price of Rejects	Rs./MT	851.02	1,869.53	1,869.53	1,869.53
Price of Dolochar	Rs./MT	543.4	0	0	0
Weighted average Price of Primary Fuel	Rs./MT	1,910.61	2,126.44	2,126.44	2,126.45
Transit Loss considered	%	0.80%	0.80%	0.80%	0.80%
Weighted average Price of Primary Fuel after Transit Loss	Rs/ MT	1,926.02	2,143.59	2,143.59	2,143.60

5.1.3 The Petitioner submits that as can be seen from the table above, the primary fuel-mix, GCV of the primary fuel-mix and its price have significantly varied in actual than approved by the Commission.

5.2 Primary fuel cost

5.2.1 The Petitioner submits that the Plant Load Factor for the first 6 months were lower due to the daily restrictions being imposed by SLDC as mentioned earlier in section 4.4.1.

5.2.2 As per the estimated fuel cost discussed in the above paragraphs, the primary fuel costs has been computed for the generating stations as provided in the table below.

Table 13: Computation of total Variable Charge

Particulars	Unit	FY 20-21 Approved	FY 2020-21 (April to Sept) Actual	FY 2020-21 (Oct to March) Estimated	FY2020-21 Estimated
Capacity	MW	63	63	63	63
Plant Load Factor	%	82.5	73.03	75	74.02
Gross units generated	MU	455.30	202.07	206.96	408.47
Auxiliary consumption	MU	47.81	22.67	21.73	44.36
Auxiliary consumption	%	10.5	11.22	10.5	10.86
Net units Generated	MU	407.5	179.4	185.2	364.1
Weighted average GCV of primary fuel	kCal/Kg.	3,061	2,604	2,604	2,604
Weighted average cost of primary fuel after Transit loss	Rs/ MT	1,926	2,144	2,144	2,144
Primary Fuel Cost	Rs. Cr	82.85	53.22	49.26	102.41

5.2.3 The Petitioner requests the Hon'ble Commission to approve the variable charge for FY 2020-21 as submitted above based on the estimated numbers.

5.3 Secondary fuel oil cost

5.3.1 As per Regulation 8.3 of the JSERC Tariff Regulations 2015, the cost of secondary fuel oil is to be considered as part of Energy charges. The secondary fuel oil cost has been computed considering normative secondary fuel oil consumption of 1.00 ml/kWh. The computation is as provided in the table below:

Table 14: Computation of Secondary fuel oil cost

Particulars	Unit	FY 20-21 Approved	FY 2020-21 (April to Sept) Actual	FY 2020-21 (Oct to March) Estimated	FY2020-21 Estimated
Gross Units Generated	MUs	455.30	202.07	206.96	408.47
Secondary fuel Oil Consumption	ml/Kwh	1.00	1.00	1.00	1.00
GCV of oil	kCal/litre	10000.00	10000.00	10000.00	10000.00
Oil consumption	KL	455.30	202.07	206.96	408.47
Base Price of Oil	Rs / KL	47472.00	70705.65	70705.65	70705.65
Cost of secondary fuel oil	Rs Crore	2.16	1.43	1.46	2.89

5.4 Computation of Energy Charge

5.4.1 As per the primary and secondary fuel cost discussed in the above paragraphs,

the energy charge has been computed for the generating stations as provided in the table below.

Table 15: Computation of Energy Charge

Particulars	Unit	FY 20-21 Approved	FY 2020-21 (April to Sept) Actual	FY 2020-21 (Oct to March) Estimated	FY2020-21 Estimated
Primary Fuel Cost	Rs. Cr	82.85	53.22	49.26	102.41
Secondary Fuel Cost	Rs. Cr	2.16	1.43	1.46	2.89
Total Energy charge	Rs. Cr	85.01	54.65	50.72	105.29
Net units Generated	MU	407.49	179.40	185.22	364.11
Total Energy charge per unit	Rs./ kWh	2.09	3.05	2.74	2.89

5.4.2 We are submitting the following details regarding the fuel used

- Annexure 5 – sample bills for secondary oil bought
- Annexure 6 – sample bills for primary fuel bought
- Annexure 7 – sample bills for transportation cost of fuel bought
- Annexure 8– auditor certificate for details of fuel source wise transit loss
- Annexure 9 – auditor certificate for fuel wise (coal, rejects and oil) details on monthly basis, separately for as received and as fired basis.

5.4.3 The Petitioner requests the Hon'ble Commission to approve the total Energy charges for FY 2020-21 as submitted above based on the estimated numbers.

6 Other charges for FY 2020-21

6.1.1 We submit that other expenses like Income tax, Water charges, APR publication and filling fee expenses will be claimed on actuals during True-up of FY 2020-21 post actual payments of these items.

7 Summary of submissions for Annual Performance Review of FY 2020-21

7.1.1 The following section provides the summary of tariff submitted by the Petitioner for APR of FY 2020-21.

7.2 Annual Fixed Cost

7.2.1 A snap shot of the Annual Fixed cost for the APR of FY 2020-21 is provided below:

Table 16 : Computation of Fixed cost

Particulars	Unit	FY 20-21 Approved	FY 2020-21 (April to Sept) Actual	FY 2020-21 (Oct to March) Estimated	FY2020-21 Estimated
O&M cost	Rs Cr.	21.72	11.81	14.64	26.45
Depreciation Charge	Rs Cr.	15.60	8.60	8.60	17.20
Interest on working capital	Rs Cr.	6.10	3.28	3.27	6.55
Interest & finance Charges	Rs Cr.	19.28	8.33	7.76	16.09
Return on Equity	Rs Cr.	19.84	7.72	7.72	15.43
Annual Fixed Cost	Rs Cr.	80.62	39.74	41.99	81.73

7.3 Energy Charges

7.3.1 A snap shot of the Energy charges for APR of FY 2020-21 is provided below:

Table 17: Computation of Energy Charges

Particulars	Unit	FY 20-21 Approved	FY 2020-21 (April to Sept) Actual	FY 2020-21 (Oct to March) Estimated	FY2020-21 Estimated
Primary Fuel Cost	Rs. Cr	82.85	53.22	49.26	102.41
Secondary Fuel Cost	Rs. Cr	2.16	1.43	1.46	2.89
Total Energy charge	Rs. Cr	85.01	54.65	50.72	105.29
Net units Generated	MU	407.49	179.40	185.22	364.11
Total Energy charge per unit	Rs./ kWh	2.09	3.05	2.74	2.89

7.3.2 The Petitioner requests the Hon'ble Commission to approve the Energy charges for FY 2020-21 as submitted above based on the estimated numbers.

7.4 Net Annual Revenue Requirement

7.4.1 The Petitioner requests the Hon'ble Commission to approve the tariff for supply of electricity to JBVNL as summarised in the Table below for the APR of FY 2020-21.

Table 18 : Net Annual Revenue Requirement

Particulars	Unit	FY 20-21 Approved	FY 2020-21 (April to Sept) Actual	FY 2020-21 (Oct to March) Estimated	FY2020-21 Estimated
Annual fixed cost	Rs Crore	80.62	39.74	41.99	81.73
Total Energy Charges	Rs Crore	85.01	54.65	50.72	105.29
Net Annual Revenue Requirement	Rs Crore	165.63	94.39	92.71	187.02

7.4.2 Overall, the Petitioner prays to the Hon'ble Commission to approve the numbers for the APR of FY 2020-21 as discussed above.

8 Prayers

8.1 IPL has the following prayers before JSERC

- a) Accept the petition for Annual Performance Review of FY 2020-21
- b) Approve the numbers for the Annual Performance Review of FY 2020-21 as discussed in this Petition
- c) Condone any inadvertent omissions/ errors/ rounding off differences/ shortcomings and permit IPL to add/ change/ modify this filing and make further submission as may be at a future date; and
- d) Pass such further and other orders, as the Hon'ble Commission may deem fit and proper, keeping in view the facts and circumstances of the case.

Annexures

Annexure No. 1 – Data formats for APR of FY 2020-21

In pen drive

Annexure No. 2 – Certificate from banks
highlighting the interest rates charged to IPL

Annexure No. 3 – Interest certificates for term
loan & Working capital loan paid to various
banks

Annexure No. 4– Auditors certificate on
month wise operational performance
parameters

Annexure No. 5 – Sample bills for secondary oil bought

Annexure No. 6 – Sample bills for primary fuel bought

Annexure No. 7 – Sample bills for transportation cost of fuel bought

Annexure 8 - Auditors certificate for fuel consumed with GCV
and with rate.

Annexure No. 9 – Auditor certificate for
Source wise monthly primary fuel purchased
and actual receipt with Transit loss for FY
2020-21.

Annexure No. 10 – Details of Restrictions imposed by SLDC