

The clarifications/additional data required from NBPDCCL pertaining to the Tariff Petition filed for FY 2018-19

1. Complete Soft copy of petition (i.e., Excel Spreadsheet along with detailed working) is to be submitted.
2. "Compliance of Directives" Chapter is not enclosed to the Petition, without which the Tariff Petition filed is incomplete. The Status of compliance of directives in Tariff Order dated 24.03.2017 may be provided briefly, without referring to any previous letters or Annexures etc. Detailed report on status of compliance of directives along with Annexures etc., may be submitted to the Commission in a separate booklet.
3. Page No. 52 is missing in the Financial Statement for FY 2016-17 submitted.

Number of Consumers, connected load and Sales

True-up (FY 2016-17)

Table-6 and 7

4. Sub-categories wise actual number of consumers of KJ Rural(un-metered), KJ Rural(metered), KJ-Urban (Metered), DS-I (metered), DS-I (un-metered), NDS-I(metered), NDS-I (un-metered), IAS-I (metered), IAS-I (un-metered), IAS-II (metered) and IAS-II (unmetered) may be submitted for NBPDCCL (excluding DF area) and for DF areas.
5. Table-6 of the Petition shows **313499** as total no of consumers under DF areas whereas the summation of in Table- 7 gives figure of **341221**. Figures may be rechecked and correct figures may be provided.
6. Para 3.2.6-In respect of number of consumers, connected load, sales etc claimed in the petition, third party audited report in this regard is required. The same may be furnished.

Table- 8,9,10

7. Table-8: Sub-categories wise Connected load of KJ Rural(un-metered), KJ Rural(metered),KJ-Urban(Metered),DS-I(metered), DS-I(un-metered),NDS-I(metered), NDS-I(un-metered) IAS-I (metered),IAS-I(un-metered),IAS-II(metered) and IAS-II(unmetered) may be submitted for NBPDCCL (excluding DF area) and for DF areas.

8. Table-9 shows connected load of DS-III consumers under DF areas as 49 kW. Based on the connected load and no of consumers claimed under DS-III category (27722) for the franchised area, the average connected load per DS-III connections comes 1.76W/connection. This is much less than the minimum load prescribed (02kW) for DS-III of connections. This may be clarified in light of the provisions of the Tariff order.
9. Table-9: Table shows connected load of NDS-III consumers under DF area as 214 kW. Whereas table 7 shows that there is not a single consumer under NDS-III category in DF area. The figures may be checked and correct figure be communicated.
10. Table 9- Connected load of SS-I,SS-II,LTIS-I,LTIS-II categories have not been shown in the table. This may be furnished.
11. Table12-Category wise sales of DF area shown in the table 12 is different from the figure shown in Annexure-II (F) of the petition. Figures may be checked and correct figure be communicated. Also category wise sales of SS-I,SS-II,LTIS-I,LTIS-II have not been furnished the same may be furnished.
12. Table-10:The table shows total sales to Franchisees as 749.870 MU. Monthly bills issued, against energy supplied to the DF, in support of sales shown may be furnished.

APR for FY 2017-18

13. Table 41-Category wise details of no of consumers under DF area is required, the same may be furnished.
14. Table 42-Category wise slab wise sales by DF to consumers may be furnished.
15. Table 42-Copy of monthly invoices served in FY 2017-18 by Licensee to DF for input energy may be furnished.
16. Table 43-Category wise connected load details of consumers projected for DF area may be furnished.

FY 2018-19

17. Table 73-Actual category wise number of consumers in DF area for FY 2013-14,FY 2014-15, FY 2015-16, FY 2016-17 may be furnished.

18. Table 74-Actual category wise sales in DF area for FY 2013-14,FY 2014-15,FY 2015-16,and FY 2016-17 may be furnished.
19. Actual category wise connected load (in kW) for NBPDC(excluding DF) as well as for DF area for FY 2013-14,FY 2014-15,FY 2015-16,and FY 2016-17 may be furnished
20. Table 75-Basis of arriving category wise growth rate projected in the table be explained.
21. Refer Table -75: The number of consumers projected for FY 2018-19 may be furnished in the following Format.

S. No.	Category	FY 2018-19		
		DISCOMS area excluding DF	DF Area	Total

22. Refer Table -76: The category-wise energy sales projected for FY 2018-19 may be furnished as below:

S. No.	Category	FY 2018-19		
		DISCOMS area excluding DF	DF Area	Total

23. Refer Table -77: The category-wise connected load projected for FY 2018-19 may be furnished in the following Format.

S. No.	Category	FY 2018-19		
		DISCOMS area excluding DF	DF Area	Total

24. Table 76- Basis of arriving category wise growth rate as projected in the table to be given.
25. Table-77: Basis of arriving category wise growth rate as projected in table to be provided.
26. Para 5.5.2: Year wise mile stone, vis-à-vis achievement of 24X7 PFA be furnished.
27. Para 5.5.3: The details of rural electrification as on date to be submitted in support of statement made under para 5.5.3

Power Purchase and Energy Balance

FY 2016-17

28. Para 3.4.1 and 3.4.2 –It is stated that figures of inter-state and intra-state transmission losses of 2.66% and 4.74 % respectively are as per audited accounts for FY 2016-17. Copy of the two audited accounts referred to in these paras may be furnished
29. Para 3.3.3 & Table 16: Even though the Commission in its last Tariff order has approved Distribution loss trajectory for FY 2016-17 as 19.25%, the petition seeks for approval of 31.43% loss level. On what basis approval on 31.43% loss is sought may be explained. Audited Accounts shows distribution loss at 25.62% for FY 2016-17. Why this figure as per Audited Accounts is not adopted may be clarified.
30. Refer Table -21: How Rs. 145.32 Cr is arrived towards disallowance of power purchase cost due to excess losses may be explained duly explaining how quantum of disallowance energy is computed and the average power purchase cost considered.
31. Para 3.6.2: It is stated that sales under UI is 77.35 MU and purchase under UI is 107.75 MU. Hence net UI overdrawal should be 30.4 MU (107.75-77.35) whereas UI purchase of 28.74 MU is shown in para 3.6.2 as well as in table 16.
32. Table-18: -At Sl. No 22 of the table, Average Power purchase cost from Adani Enterprises is shown as Rs 30.36/kWh. Fixed charges of Rs. 24.49 Crore are paid and purchase of energy is only 7.49 MU. Month-wise details of energy purchased, fixed charges, energy charges and other charges paid may be furnished.
33. Table-18: -The table shows payment on account of UI (net over drawal of 28.74 MU) is Rs 38.45 crore. Details including receivable, payable and break-up of the total amount into

- deviation and Additional deviation charges may be submitted. Actuals of UI over drawl (purchase) and its cost and UI under drawl (Sale) and its cost may be provided.
34. Refer Table -18: Net UI at 28.74 MU and Net Cost of Rs. 38.45 Cr is shown. Actuals of UI over drawl (purchase) and its cost and UI under drawl (Sale) and its cost as per accounts may be provided.
 35. Table 18-Station wise, Component wise, break-up of other charges claimed in the table may be furnished. Nature of other charges paid may also be furnished.
 36. Table 18-Details of available energy Vs scheduled energy in order of merit is required, the same may be furnished.
 37. Table 18- Station-wise/Source wise Late payment surcharge paid and rebate amount availed towards power purchase is to be submitted.
 38. Table 18- It is noted that average power purchase rate from open market is Rs. 2.91/kWh and from IEX/PXIL is Rs. 3.06/kWh, but costlier power with variable cost of Rs. 3.89.kWh from Barh-I, Rs. 3.97/kWh from Barauni-I, Rs. 3.69/kWh from Adani has been procured which could have been avoided if merit order dispatch was followed. This may be clarified.
 39. Table-18:The table shows total Power Purchase cost (including transmission charges) as Rs 4201.15 crore whereas the audited account shows total power purchase cost Rs 4203.91 crore (Note 22of the audited account), Rs 4203.36 crore (Note 27(6)of the audited account) . The figures may checked and justification of difference in figures be given.
 40. Copy of invoices in support of Power purchase cost, POSOCO, SLDC,BSPTCL and inter & intra state transmission charges claimed may be furnished.
 41. Refer Table -21: How Rs. 143.32 Cr is arrived towards disallowance of power purchase cost due to excess losses may be explained duly explaining how quantum of disallowance energy is computed and the average power purchase cost considered.
 42. Refer Table 39: Sum total of units sold to industrial LT and industrial HT are wrongly furnished.

43. Annexure - IX of the petition: Figures and denomination/units considered in the tables may be checked and confirmed.
44. A.19. Annexure-XI: The figures given in annexure-XI and Annexure IX are different please check and communicate the correct figure.
45. Pro-forma V: Figures in the table attached at Pro-forma V is different from figures in table 16.
46. Annexure C of the financial statement : It is stated at Sl. No. iv of Annexure C of the financial statement that SERC has not approved the FPPCA for FY 2016-17 during the year. Please communicate when petition for FPPCA was filed to BERC during FY 2016-17
47. Refer Table -15: No. RECs are procured during FY 2016-17. But in the ARR Rs.75.85 Cr is shown as deposit for RPO obligation. It may be clarified. Whether this amount is deposited in any Bank as a separate fund.
48. Refer Table -18: Net UI at 28.74 MU and Net Cost of Rs. 38.45 Cr is shown. Actuals of UI over drawl (purchase) and its cost and UI under drawl (Sale) and its cost as per accounts may be provided.

FY 2017-18

49. Table 48- Revised table considering energy sales of entire licensed area (including DF area) may be provided.
50. Table 49-Fixed cost of the power plants for thermal and hydro are independent of kWh, then how fixed cost in Rs/kWh has been projected may be explained in detailed.
51. Table 49- Power purchase cost in following format may be furnished.

Plant /Unit	Installed capacity	Aux consumption	Available capacity of the plant/unit	% allocation to NBP DCL	Available capacity in MW to NBP DCL	Avg PLF	Available energy in MU	Fixed charge(Rs/MW)	Total Fixed charge	E.charge rate(Rs/kWh)	Total E. charge	Other charge(pl specify)	Total Charge

FY 2018-19

52. Para 5.5.4:Copies of all PPAs to be submitted with year wise CoD and/or availability of power during FY 2018-19 from each source.
53. Para 5.8.1: Latest power allocation notification of MoP to be submitted.
54. Para 5.8.6:Plant wise/Unit wise, month wise, actual PLF for FY 2016-17 and FY 2017-18 (as on date) may be submitted.
55. Table 81:Solar and Non Solar energy to be procured as projected in the table is different from the figure projected in table 80.The reason of difference may be given.Also submit detailed plan to meet the RPO as projected in table 81.
56. Para 5.10.1:What is the basis of considering 10% CUF, despite the fact that normative CUF as approved by the Commission is 19%.
57. Refer Table -86: How losses in Regional transmission system of 281.02 MU computed may be clarified. Energy considered from sources out-side State and energy considered from sources within state may also be provided.
58. Table 86- Revised table considering energy sales of entire licensed area (including DF area) may be submitted.
59. Fixed cost of the power plants for thermal and hydro are independent of kWh, then how fixed cost in Rs/kWh has been projected, this needs explanation.
60. Para 87: Power purchase cost in following format may be submitted.

Plant /Unit	Install ed capacity	Aux consu mption	Available capacity of the plant/unit	% allocatio n to NBPDC	Available capacity in MW to NBPDC	Avg PLF	Availab le energy in MU	Fixed charge(R s/MW)	Total Fixed charge	E.charge rate(Rs/kWh)	Total E. charge	Other charge(pl specify)	Total Charge

**Capital investment, capitalization, Depreciation etc
FY 2016-17**

61. Table-22:As per Audited Account Note-2 Fixed Assets amounting to Rs. Rs.13.17 Crore has been demolished and subtracted from Gross Block but corresponding adjustment in Accumulated depreciation and Grant have not been made. please clarify.

62. Table-22: Project wise and plan wise amount of Grant received as on 31.03.2016 & 31.03.2017, Utilized for capitalization made as on 31.03.2016 & 31.03.2017, Utilized for CWIP as on 31.03.2017, amount of grant kept as bank balance and amount of interest earned on idle fund of grant may be sought to substantiate that why out of total grant received during the year Rs.1766.97 Crore as stated in Note-12 of Financial Statement only Rs.48.11 Cr has been capitalized.
63. Table 24:S.no.9: Closing Grants approved for in True-up order of FY 2016-17 was Rs. 3,757.79 Cr, so please justify why Opening figures of Grants changed and taken as Rs. 1,802.61 Cr.
64. Para 3.11.1-As per Audited account no details of capitalization against CWIP and new investment is maintained, then how amount has been derived and claimed separately for capitalization against work in progress and new investment? please clarify.
65. Table22-Scheme-wise element-wise details of capitalization with funding pattern separately, under head of CWIP and new investment be furnished.
66. Table 22:As observed from Audited accounts Work register for CWIP have not been maintained.Also the present status of CWIP is not known and may include old and abandoned works which may be required to be written-off.Please clarify whether the CWIP for FY 2016-17 excludes such items. Also clarify how in absence of such details CWIP has been claimed in true-up for FY 2016-17. Further component and work-wise breakup of closing CWIP like IDC,Interest earned, advance etc as per audited account amounting to Rs. 6,827.52 Crore may be furnished.
67. Table-23: As per audited accounts running and defective meters and conductors in case re-conductoring, which are being replaced with new meters/conductors are not being removed from the accounting system/Financial statement. Please clarify whether the cost of such assets from GFA is deducted, if yes, detail methodology adopted for doing so may be submitted.
68. Table-24: The fixed asset register has not been maintained. Accordingly, depreciation has been calculated on straight line method by applying the applicable rate on the opening gross block without considering individual assets which might have been depreciated

upto 90% of their cost on which no further depreciation is required to be charged. Hence there seems to be excess charge of depreciation to that extent. Please justify your claim of depreciation in light of the said observation.

69. Table 25-Other finance charges includes Late payment surcharge/interest justification be given as why such interests be passed on to the consumers despite the fact that such expenses are attributable to Licensee.

FY 2017-18

70. Table 60-Why different rates of depreciation has been taken at Sl No 9 and Sl No 15 in the table this may please be explained.
71. Other Finance Charges-What are the basis for consideration of uniform 10% escalation on all component of other finance charges like Discount to consumers for timely payment of Bills, Power Factor Rebate, LPSC to Power Suppliers and Other Bank Charges, this may please be explained along with details of calculation.
72. Since there is opening difference in Grant claimed for True-up, average grant and depreciation claimed would get revised, this may please be justified.

FY 2018-19

73. Since there is opening difference in Grant claimed for True-up, average grant and depreciation claimed would get revised, this may please be justified.
74. Table 85:At sl No 13 In the table what is ACA State Plan? please furnish details of the claimed amount under this head.
75. Table 88: Why different rates of depreciation have been taken at Sl No 9 and Sl No 15 in the table this may please be explained. Also submit details of calculation to arrive at 5.91% (at sl No)and 6.20%(at sl No 15)

O&M expenses

FY 2016-17

76. Table 25: As per para13.1 of notes to audited accounts, obligation of company towards PF, Gratuity, General Provident Fund, CPS,GSS ends on payment of Fixed contribution that form part of Terminal Benifits. Justification may be sought of claim of Interest to Group Saving Scheme, Interest on General Provident Fund and Interest on Gratuity.

77. Table 26- As per audited accounts, project works through agencies are being carried out but no corresponding capitalization of employee expenses is shown. This needs clarification.
78. Table 27-Detailed breakup of expenses claimed under the head "Line cable networks" may be furnished.
79. Table-28-As per audited accounts project works through agencies are being carried out but no corresponding capitalization of A& G expenses is shown. This needs clarification.
80. Table 28-In respect of the fact that the claimed A&G expenses does not include penalty amount an undertaking may be furnished.
81. Table 28:Details of claims under the heads "Remuneration of executive assistant" and "Miscellaneous losses and write-offs" be submitted.
82. Table 28-Detailed breakup of Miscellaneous expenses may be furnished.
83. Table 28: It is observed from the audited accounts that Age-wise details of outstanding trade receivables are not available also no provision for doubtful debts have been made during the year. Please justify how an amount of Rs 4.26 crore in table 28 has been included despite the fact that the audited account for FY 2016-17 does not include any amount against write-off.
84. Table 29-Copy of audited account of Holding company in support of Holding company expenses claimed may be furnished.
85. Para 3.15-Regulation 22 of Bihar Electricity Regulatory Commission (Multi Year Distribution Tariff) Regulations, 2015 provides for specification of norms for each component of O&M expenses based on audited figures of last three years. In view of the said Regulations proposal of norms for each component of O&M expenses may be submitted.

FY 2017-18

86. Para 4.11.2.1-Govt of Bihar has implemented recommendation of 7th pay Commission w.e.f 01.04.2017,then how it has been considered w.e.f01.01.2016,this may please be clarified. Salaries are considered at escalation of 198% of FY 2016-17 salaries. What is the

actual impact of percentage increase of salaries due to 7th Pay Commission may be furnished.

87. Table 53- Although project works through agencies are being carried out but no corresponding capitalization of employee expenses is projected. This needs clarification.

88. Table 56- Although project works through agencies are being carried out but no corresponding capitalization of A&G expenses is projected. This needs clarification.

FY 2018-19

89. Table 94: Although project works through agencies are being carried out but no corresponding capitalization of employee expenses is projected. This needs clarification.

90. Table 97: Although project works through agencies are being carried out but no corresponding capitalization of A&G expenses is projected. This needs clarification.

91. Table 98: For what tenure the holding company has been constituted?

Interest on Working capital

FY 2016-17

92. Table-31: Figure of security deposit (SD) considered in the table is not in line with the statement made at Para 3.16.2 of the petition. Further the figure of SD is different from the one considered in table-38. This may be clarified.

93. 3.16.5: It is stated that in computing Interest on working capital two months security deposit has been considered. Reason of taking only two months Security deposit (**In fact it is taken for one month only**) may be given in light of BERC (Multi-year Distribution) Regulations, 2015.

FY 2017-18

94. Para 4.16.2-It is stated that in computing Interest on working capital two months security deposit has been considered. Reason of taking only two months Security deposit may be given in light of BERC (Multi-year Distribution) Regulations, 2015.

FY 2018-19

95. Table 101: The figure of SD at Sl. No. 3.3 is not in line with the one shown in table 100. This should be average of opening and closing SD as shown at sl no 4 of table 100. The same may be checked and confirmed.

Return on equity

FY 2016-17

96. Table 32-Opening Equity approved in earlier tariff order was Rs. 440.86 Crore but in this petition higher opening equity of Rs.831.33 Crore (i.e Rs. 1,372.11 Cr-Rs.540.78 Cr) has been considered, Justification of considering different opening Equity that approved in earlier Tariff order may be given.
97. Table 32-While computing average equity asset created from grant has not been deducted from opening equity which has resulted in higher equity, this may be explained.
98. Table-32: ROE on entire assets has been claimed @16% whereas prevailing regulation provides for ROE@15.5% on those assets which is capitalized after 01.04.2016. Justification of considering different ROE in violation of regulation may be given.
99. Table 32- RoE claimed is inclusive of 0.5% incentive for timely completion of projects. To substantiate the claim details of assets with scheduled completion period vis-à-vis actual completion period may be furnished.
100. Table 32:The total issued,subscribed and paid-up capital and share application money pending allotment amount to Rs 525319.45 lakhs as on 31.03.2017 which is more than the authorized share capital of the company of Rs 400000 lakhs as on the date. Please clarify why the capital issued more than the authorized should be issued.

FY 2017-18

101. Since there is opening difference in equity claimed for True-up, average equity and ROE claimed would get revised, this may please be justified.
102. Table-61: ROE on entire assets has been claimed @16% whereas prevailing regulation provides for ROE@15.5% on those assets which is capitalized after 01.04.2016. Justification of considering different ROE in violation of regulation may be given.
103. Table 61-Return on equity @16% has been projected i.e including incentive of 0.5% for timely completion, this may please be justified with completion dates considered vis-à-vis scheduled completion dates.

FY 2018-19

104. Since there is opening difference in equity claimed for True-up, average equity and ROE claimed would get revised, this may please be justified.

105. Table-99: ROE on entire assets has been claimed @16% whereas prevailing regulation provides for ROE@15.5% on those assets which is capitalized after 01.04.2016. Justification of considering different ROE in violation of regulation may be given.
106. Table 99: While computing average equity asset created from grant has not been deducted from opening equity which has resulted in higher equity, this may be explained.
107. Table 103: RoE claimed is inclusive of 0.5% incentive for timely completion of projects. To substantiate the claim details of assets with scheduled completion period vis-à-vis projected completion period may be furnished.

Interest on loans

Fy 2016-17

108. Table 34:-Opening Loan approved in earlier tariff order(i.e based on True up of FY 2015-16) was Rs. 552.31 Crore but in this petition higher Loan of Rs.1939.75 Crore (i.e Rs. 3,201.58 Cr-Rs.1261.83 Cr) has been considered, Justification of considering different opening Equity that approved in earlier Tariff order may be given.
109. Table 33:-As per statutory auditors observation an amount of Rs 7886.26 lakh is being carried forward from earlier years as short term loan from banks.Please justify whether the loan amount claimed in table 33 includes such amount of Rs7886.26 lakh.

FY 2018-19

110. Since there is opening difference in Loan claimed for True-up, average loan and interest claimed would get revised, this may please be justified.
111. Table 91: The average loan should have been 3320.01 crore against which the table shows Rs 4449.87 crore ,this may please be explained.

Government grant/subsidy

FY 2017-18

112. Table 71-The table shows grant of Rs 1165.60 crore, is this figure includes amount given by State Govt for subsidizing the tariff of consumers, if yes category wise subsidy amount considered may be given.

FY 2018-19

113. Table 141: In table GoB subsidy same as provided in FY 2017-18 has been considered. Is there any assurance from GoB for the such subsidy for Fy 2018-19? please explain the basis of considering said subsidy.

Interest on consumer security deposit

FY 2016-17

114. Para 3.19.2:-It is stated that interest on security deposit is paid to LT and HT consumers. Please furnish break-up of such interest paid under heads interest paid to LT and Interest paid to HT consumers.

Prior period income/expenses

FY 2016-17

115. Table-36:-Please furnish item wise and year wise (to which it relates) details of income and expenses claimed in the table.

Non-tariff income

FY 2016-17

116. Table38:-The Non-tariff income does not reflect recoveries against theft of power, please furnish the same.

FY 2018-19

117. Table 102:Why the amount to be collected against theft of electricity is not reflected in non-tariff income?
118. Head wise details of Miscellaneous recoveries claimed at Sl No 10 in the table is required, the same be submitted.

Revenue from sales

FY 2016-17

119. Table 42:-Category wise details showing number of consumers, billed demand /connected load, units sold, billed fixed charge, energy charges(slab-wise) and other charges for FY 2016-17 may be furnished.
120. Table 42-Copy of all the invoices issued to Franchisees in support of revenue from sales to DF claimed in the table may be submitted.

FY 2017-18

121. Refer Table -72: It is observed that Revenue from sale of power at existing tariff is computed with fixed charges and energy charges that are different from the rates approved in the Tariff Order dated 29.03.2017 (i.e., after reducing energy rates by subsidy). Detailed computation of Revenue from sale of power for FY 2017-18 may be provided in the Format just like provided for FY 2018-19 in Annexure A-20 (Page 201 to 203 of Petition), **considering the Tariff rates approved in Tariff Order dated 24.03.2017.** Similarly for FY 2018-19 also.
122. The month-wise Revenue billed for sale of energy (as on date) during FY 2017-18 may be furnished as below:

S. No.	Month	Total energy Sale (MU)	Revenue billed as per approved Tariff rates (Rs. Cr)	Amount to be paid by State Government towards subsidy to the consumers (Rs. Cr)	Net Revenue to be paid by the consumers (Rs. Cr)

123. Trial balance showing the revenue and expenses of Profit and loss accounts and also the assets and liabilities for the period from 1st April 2017 to 30th September 2017 of FY 2017-18 is to be furnished.

Audited Accounts for FY 2016-17

124. Para 3.11.1: The grants utilised for capex is stated at Rs.240.53 crore in the petition. However, as per the audited accounts for FY 2016-17 (Note 12 – Capital Reserve) addition to reserves is at Rs.1766.97 crore. Reasons for the difference may be furnished. Further, the schemes against which the amount of Rs.1766.97 crore is received may be furnished along with present status of the said schemes.

125. Interest payable to consumers security deposit – Rs.79.57 crore (Note 18 of annual accounts). Interest on consumers security deposits – Rs.21.34 crore (Note 24 of annual accounts). In effect during the year 2016-17, the company has adjusted/passed on the interest to consumers of Rs.5.35 crore. Reasons for not crediting/passing on the interest to consumers may be furnished. Further, it may be explained as to why interest shall be allowed in the ARR when the same is not passed on to the consumers.
126. As per the audited accounts Note 12 Consumer contribution – additions during the year is at Rs.18.37 crore. The consumer contribution received during the year is not considered in the tariff petition (True up for FY 2016-17) in Table 22 (CWIP and capitalisation) and Table 24 (Depreciation) and also in the scheme-wise capex and capitalisation details furnished in Annexure-XII (A) for FY 2016-17, Annexure-XII (B) for FY 2017-18 and Annexure XII (C) for FY 2018-19. Reasons may be furnished.
127. The effective rate of depreciation for FY 2016-17 works out to 4.97% based on depreciation and the average fixed assets (excluding value of land). However, rate of depreciation is adopted 4.41% (Table 24) for computing depreciation on assets. The same may be verified and details for adopting 4.41% be furnished.
- Further, the rate of depreciation in respect of grants is adopted at 5.34%. The maximum rate of depreciation as per the regulations (rates of depreciation notified through CERC regulations 2014) is at 5.28% only. Reasons for adopting 5.34% may be furnished along with computation details.
128. Balance with Banks – Savings/Current accounts – Rs.1295.67 crore (Note 8 of audited accounts). Reasons for huge cash balance as on 31.03.2017 may be furnished.
129. Details for other claims receivable Rs.100.94 crore (Note 10 of audited accounts) may be furnished along with party-wise/agency-wise and nature of claims.
130. Subsidy/grant receivable under OTS scheme Rs.73.20 crore (Note 10 of audited accounts). Details may be furnished whether relevant claims were made with the GoB.

131. Addition to vehicles is shown at Rs.49,500 during FY 2016-17 (Note 2 Fixed assets). Details may be furnished.
132. Electricity Duty and other levies payable to Govt. Rs.49.21 crore (Note 18). It is observed that Rs.9.69 crore (49.21 – 39.53) is paid additionally to the Government i.e. in excess of ED actually billed/collected from the consumers during FY 2016-17. Reasons for such payment and huge negative balance may be reported.
133. It may be confirmed that cost of new equipment is not included in the Repairs and maintenance expenses during FY 2016-17 (Note 26 of audited accounts) reported through audited accounts.
134. The A&G expenses have increased by 46% (excluding holding tax) during FY 2016-17 over previous year FY 2015-16. Justification for increase (item-wise) may be furnished with reference to Telephone charges, Legal charges, misc. expenses, Commission others, etc.
135. Details for the holding tax expense of Rs.9.08 crore may be furnished along with documentary evidence.
136. Details for the remuneration to executive assistant of Rs.4.17 crore for FY 2016-17 may be furnished along with nature of services provided/availed, etc.
137. Details for Miscellaneous losses and write-off Rs.4.25 crore (Note 26 of audited accounts) may be furnished.
138. Details for the Prior period sale of power (-) Rs.290.26 crore may be furnished with reference to the year for which the amount represent, etc.
139. (i). **Return on equity:** It is observed that the petitioner is claiming RoE in true up for FY 2016-17, APR for FY 2017-18 and ARR for FY 2018-19 duly considering 30% of the GFA (reduced by 30% of the grants) at the beginning of the year and also on the additions during the respective years. The GFA includes the value of revaluation also, which shall be reduced from the value of assets. Further, the tariff process is a continuing process and the opening balances shall be adopted based on the closing balances approved in true up

in the preceding tariff order. However, the petitioner is following different principle for computing RoE.

(ii) Interest on Loans: Similar process is also adopted by computing interest on loans i.e. considering debt at 70% of the GFA (reduced by 70% of the grant) at the beginning of the year and also on the additions made in the respective years.

The petitioner may explain in detail as to why the petitioner is making claims in contravention to the BEREC regulations

Voltage wise cost of supply

140. Table 112: In absence of actual data of voltage wise technical and commercial loss as well as network cost, the voltage wise cost of supply proposed for FY 2018-19 based on methodology suggested by Hon'ble APTEL will not be a true reflection of actual voltage wise cost of supply.

Despite directive issued to conduct study to assess voltage wise technical loss of all feeders upto 33kV voltage level and selected feeders of 11kV & LT having various consumer mix vide directive no 8 and preparation voltage wise asset register vide directive no 12, neither such study has been conducted nor has voltage wise asset register has been prepared. The Commission has taken serious note of this and direct the licensee to submit revised proposal of voltage wise cost of supply based on actual sampled data else it give an undertaking on affidavit that it will conduct the said study and prepare voltage wise asset register in FY 2018-19 itself and ensure to file voltage wise cost of supply proposal based on such actual data from the next control period starting from FY 2019-20 positively.

141. Refer Para 7.5.2: The details of losses of sample feeders data used for computing voltage-wise cost of supply may be provided.

Meter Rent

142. Para 8.2.2: There can be two methodologies for recovery of financing towards cost of meter

- *Through tariff*: In addition to the interest on loan, depreciation is allowed to meet the repayment towards financing
- *Through meter rent*: Meter costing along with financing interest is recovered through meter rent, provided capex towards meter is separately maintained.

In the present scenario, capex towards meter is not separately maintained by DISCOMs and is a part of capex on which apart from interest on finance depreciation is allowed year on year and recovered through the year on year tariff. Simultaneously, a part of such investment is also recovered through meter rental, which is considered as non-tariff income to affect the corresponding depreciation to this extent.

Further meter rent has been proposed to increase without considering useful life of the meter. Please justify the proposal with respect to recovery period and useful life of the meter.

143. Table 121: Please check and clarify whether rate of the following types of meter and associated metering equipment is Rs 121240 as claimed in the table 126:-

- LT 3 phase 4 wire electronic meter with CT set
- 11 kV 3 phase 4 wire electronic meter with metering unit
- 33 kV 3 phase 4 wire electronic meter with metering unit

144. Table 121: Please check and clarify whether rate of the following types of meter and associated metering equipment is Rs 2,50,000 as claimed in the table 126:

- 25 kV 3 phase electronic meter with metering unit
- 132 kV 3 phase 4 wire electronic meter with metering unit

145. Table 124: Please clarify why meter rent has not been proposed for 220 kV 3 phase 4 wire electronic meter with 220 kV metering unit to be used for 220 kV consumers.

Security deposit

146. Para 9.4.12:For computing initial security deposit for categories other than HTSS category demand charge has not been included this may please be checked and confirmed.
147. Para 9.4.12:As per Bihar electricity supply code-2007 the Security deposit should be equivalent to two months bill but the proposal under the para is not clear about this. This may please be clarified.

Wheeling and Open Access Charge

148. No additional surcharge charge to be levied from open-access consumers has been proposed in the tariff petition. The same may be clarified whether it is required or not ? If yes proposal be submitted with detailed calculation for:
- Long term Open-access
 - Short term open access

149. Refer Table 145: The ARR figures shown for segregation of wires and Retails business are not tallying with any ARR figures. Correct figures for FY 2018-19 may be adopted and accordingly the Tables may be revised.
150. Refer Table -148: Average power purchase rate is calculated as Rs. 4.53/kWh but adopted as Rs. 4.49/kWh for computing cross subsidy surcharge correct computation may be provided.

UDAY Implementation

151. Para 3.18.6:-The GoB has given Rs 961.88 crore grant for financial restructuring under UDAY and has been utilized to liquidate the loan. As such the assets already created through loan should have been now considered as created through grant or liquidation of working capital loan should have now considered as reduction from normative working capital. Please explain the effect and accounting approach of said grant on assets created and working capital loan liquidated.
152. Date wise details of amount received and amount utilized for liquidation of Loan under UDAY may be furnished.
153. The detailed Income statement appended at page 16 of Tripartite MoU of UDAY, Rs 929 crore and Rs 1551.02 crore are indicated towards "State Govt support towards supply to

BPL and Rural consumers” and “Subsidy as Operational Funding Requirement (OFR) by State Govt” respectively. Detail on income under these two heads in FY 2016-17 may be furnished.

FY 2017-18

154. The detailed Income statement appended at page 16 of Tripartite MoU of UDAY, Rs 1298 crore and Rs 1305.71 crore are indicated towards “State Govt support towards supply to BPL and Rural consumers” and “Subsidy as Operational Funding Requirement (OFR) by State Govt” respectively. Detail on income under these two heads in FY 2017-18 may be furnished.

155. Date wise details of amount received and amount utilized for liquidation of Loan under UDAY may be furnished.

Annexures

156. Annexure-I: The data in the table does not seem correct please verify and submit correct data.

157. Annexure VIII: Monthly details of Late payment charges has not been submitted please submit the same.