



CHHATTISGARH STATE POWER TRANSMISSION COMPANY LIMITED

छत्तीसगढ़ स्टेट पावर ट्रांसमिशन कंपनी लिमिटेड

(C.G. Govt. Undertaking) (छत्तीसगढ़ भासन का एक उपक्रम)

CIN-U40108CT2003SGC015820

CHHATTISGARH STATE LOAD DESPATCH CENTRE: RAIPUR

GST No. – 22AADCC5773E1ZX

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Ref: 03-02/SLDC/

Raipur, Dated:23/01/2025

To,

The Secretary,
Chhattisgarh State Electricity Regulatory
Commission, Irrigation Colony, Shanti Nagar,
Raipur, Chhattisgarh - 492001

Sub: Regarding Petition filed for approval of True-Up of FY 2023-24 and determination of SLDC charges for FY 2025-26: Data gap in respect of petition no. 97/2024.

Ref: CSERC letter no.P.No.97 of 2024/2354 Raipur dtd 26.12.2024

In regard to Data Gaps/ Additional Information Required asked by Hon'ble Commission in letter No. P. No. 97 of 2024/2354 dated 26.12.2024 for petition filed by CSLDC for True-Up of FY 2023-24 and determination of SLDC charges for FY 2025-26:

A. General

1. CSLDC should submit the Audited Accounts of CSPTCL for FY 2023-24 duly signed by Statutory Auditor in hard copy and soft copy in Excel.

Reply: CSLDC would like to submit that, Audited Accounts of CSPTCL for FY 2023-24 duly signed by Statutory Auditor in hard copy and soft copy in Excel is being enclosed as **Annexure A1**.

2. There are several typographical errors in the Petition, with the year stated as FY 2022-23 and even as FY 2021-22 instead of FY 2023-24, and references to CSLDC where CSPTCL should be referred. CSLDC should submit the detailed Errata and Corrigendum listing all the errors and corrections.

Reply: CSLDC would like to submit that the revised Petition is attached as **Annexure A5**.

3. The table numbering is incorrect and repeated and there are several typographical errors also. CSLDC should re-submit all corrected Tables of the Petition correctly numbered and without any typographical errors.

Reply: CSLDC would like to submit the revised petition with correct list of tables is attached as **Annexure A5**

4. CSLDC should submit the of expenses and revenue claimed by CSLDC in its true-up Petition for FY 2023-24 w.r.t. the Audited Accounts of CSPTCL for FY 2023-24, the segment-wise report of CSLDC.

reconciliation

Reply: The reconciliation of expenses and revenue claimed by CSLDC in their respective true-up petitions for FY 2023-24 w.r.t. the Audited Accounts of CSPTCL for FY 2023-24 and the segment – wise report has been already submitted in the model of FY 2023-24.

5. CSLDC should submit the copy of the Petition in MS Word format.

Reply: Copy of the petition in printed format and MS Word format is attached in **Annexure A5**

6. CSLDC should submit the status of compliance with all Directives issued by the Commission.

Reply: CSLDC would like to submit that the company is taking all measures and is progressing gradually towards shifting to Electric Vehicles for official commutation purpose.

B. True-Up of ARR of FY 2023-24

7. In Table 1 of the Petition, CSLDC has reported Opening GFA and Closing GFA as Rs. 17.32 Crore and Rs. 22.32 Crore, respectively, whereas in MS Excel Model and in Table 2 of the Petition, the Opening GFA and Closing GFA are considered as Rs. 17.33 Crore and Rs. 22.26 Crore, respectively. CSLDC should reconcile the discrepancy.

Reply: CSLDC would like to submit that it has inadvertently mentioned Rs. 17.32 Crore and Rs. 22.32 Crore as Opening GFA and Closing GFA, respectively in the Petition, however it has considered Rs. 17.33 Crore and Rs. 22.26 Crore, respectively as opening and closing GFA.

The opening GFA is as per the closing GFA approved by the Commission for FY 2022-23 vide Order dated 1.6.2024 while approving the true up for FY 2022-23. The Asset addition claimed by CSLDC is Rs. 4.93 Crore during FY 2023-24 and therefore the closing balance is Rs. 22.26 Crore.

8. CSLDC should submit the reconciliation of payment made by CSPDCL to CSLDC with revenue booked by CSLDC, including Revenue Gap/(Surplus) of true-up, which was separately billed by SLDC

Reply: Summary of reconciliation is tabulated in table below. Further month wise billed and received amount has been annexed in **Annexure B8**.

Billed amount by CSLDC	Amount in Rs.
CSPGCL	8,03,37,000.00
CSPDCL	7,22,50,080.00
CSPDCL (70 MW)	56,47,320.00
CSPTradCL instead of CSPDCL (376.5 MW)	1,17,65,640.00
Total Billed Amount	17,00,00,040.00
Total Received Amount	17,00,00,040.00
Balance Difference	0.00

9. As regards the actual interest rate of 10.95% on long-term loans considered for FY 2023-24,
- CSLDC should submit the documentary evidence for arriving at the weighted average interest rate of 10.95% on long-term loans for FY 2023-24, as claimed in Table 3.

Reply: CSLDC does not have any actual loans as it is not operating as a separate Company. However, CSPTCL has a long-term loan for FY 2023-24 with rate of interest of 9.32%. The calculation for weightage average rate of Interest is shown as under:

Sr. No	Particulars	Opening Loan	Addition	Repayment	Closing	Average	RoI	Interest
1	PFC	374.30		98.22	276.08	325.19	9.88%	32.11
2	REC	821.26		62.65	758.61	789.94	9.50%	75.01
3	SBI Loan	57.24		10.77	46.47	51.85	9.06%	4.70
4	BOM	128.45	31.34		159.79	144.12	7.86%	11.33
5	Indian Bank	30.20	37.64		67.84	49.02	7.40%	3.63
	Total	1,411.45	68.98	171.64	1,308.79	1,360.12	9.32%	126.78

- In Para 4.11, CSLDC has stated that it has considered the interest rate as applicable for CSPTCL, as CSLDC does not have any actual loans as it is not operating as a separate Company. However, CSLDC has considered the interest rate on long-term loans for FY 2023-24 as 10.95%, whereas CSPTCL has considered the interest rate on long-term loans for FY 2023-24 as 9.32%. Further, the actual interest for CSPTCL also appears to be 2.57%, after considering interest subsidy. CSLDC should clarify this discrepancy and submit the revised computations of interest rate and interest expense for FY 2023-24.

Reply: It is to inform that the term “ interest subsidy” stated by CSPTCL is incorrect. The amount received from the State Government is Rs. 91.88 Cr. towards interest may not be termed as “ interest subsidy” rather it may be considered as “ surcharge” received on amount of receivable taken over by the State Government. Had the amount receivable from CSPDCL not taken over by State Govt., CSPDCL would have paid the surcharge on it. Further, CSLDC in the Petition had inadvertently mentioned 10.95% however it has considered 9.32% as weighted average rate of interest for computation of IoL.

Accordingly , it is requested to consider total interest on TL as Rs. 0.16 Cr. it is also requested to consider weighted average interest rate as 9.32% instead of 2.56%

10. CSLDC has claimed Nil Repair & Maintenance (R&M) expenses in FY 2023-24 in Table 5, Table 8, and in the computation of sharing of gains and losses. CSLDC has claimed actual R&M expenses of Rs. 1.70 Crore and Rs. 2.18 Crore in FY 2021-22 and FY 2022-23, respectively. CSLDC should clarify the reasons for incurring Nil R&M expenses in FY 2023-24.

Reply: CSLDC would like to submit that it has inadvertently claimed NIL as R&M Expenses. The Actual R&M Expenses for CSLDC is Rs. 1.64 Crore for FY 2023-24. The revised computation considering Rs. 1.64 Crore as R&M expense is mentioned below.

S. No.	Repair Maintenance of SLDC	FY 2023-24
	Particular	Rs.
1	Lub & Cons Consumed	66571
2	R&M-O/Misc. Plant & Equipment	15781446.3
3	Materials for CWIP	191160
4	R&M- Electrical Equipment	34504
5	R&M- Furniture	113280
6	R&M- Computer	237770
	Total in Rs.	16424731.3
	Total in Rs. Crore	1.64

11. In Table 5 of the Petition, CSLDC has claimed total O&M expenses of Rs. 12.08 crore, whereas in Para 4.20, the total O&M expenses have been claimed as Rs. 12.06 Crore. CSLDC should clarify the discrepancy.

Reply: CSLDC would like to submit that the total O&M Expenses claimed for FY 2023-24 is Rs. 13.72 Crore. The break-up of the same is shown below.

S. No.	Actual O&M Expenses	FY 2023-24
	Particular	Rs. Crore
1	Employee Expenses	11.20
2	A&G Expenses (Net of Capitalization)	0.88
3	R&M Expenses (Net of Capitalization)	1.64
4	Total O&M Expenses	13.72

12. While computing the normative working capital requirement for FY 2023-24, CSLDC has considered the Receivables equal to 45 days of the ARR claimed in the True-up, instead of linking it to the actual Revenue billed in FY 2023-24 and considering equivalent to 1 month instead of 45 days. CSLDC should submit the revised computation of IoWC, after considering the –

- Receivables linked to the actual Revenue rather than the ARR.
- Receivables equivalent to 1 month rather than 45 days.

Reply: CSLDC submit that it has inadvertently considered receivables equivalent to 45 days instead of one month and linked it to ARR instead to actual revenue. The revised calculation after rectifying the error is shown as under:

S. No.	Interest on Working Capital	FY 2023-24
	Particular	Rs. Crore
1	O&M Expenses (15 days)	0.56
2	Spares - 20% of M&G Expenses	0.45
3	Receivables	1.42
4	Total WC Requirement	2.43
5	Rate of Interest on WC	8.59%
6	Interest on WC	0.21

13. CSLDC should submit the documentary evidence for the average actual sanctioned rate of interest applicable for CSLDC for FY 2023-24, in accordance with the provisions of the MYT Regulations, 2021.

Reply: Sanction letter of the working capital loan is enclosed herewith as **Annexure B13**. It is reiterated that the interest rate for working capital is 8.59%.

14. CSLDC should clarify the rate of interest for IoWC should be considered as 7.85% or 7.29%, as stated by CSPTCL in its Petition [Para 5.42].

Reply: CSLDC would like to submit that it has inadvertently considered 7.85% interest rate in the computation however CSLDC would like to revise the actual interest rate to 8.59%. The revised calculation for the arriving at the rate of interest of Working capital of 8.59% is shown below:

S. No.	Bank Details	Amount of Working Capital drawn	Rate of Interest	Interest in Rs Crore	Weighted Average Rate of Interest
1	IDBI WC	100.00	8.45%	8.45	
2	ICICI WC	30.00	8.90%	2.67	
3	SBI WC	130.00	8.63%	11.21	
		260.00		22.34	8.59%

15. CSLDC has stated Non-Tariff Income as Rs. 0.24 Crore in Para 4.33 of the Petition, whereas in Para 4.34 and Table 8, the NTI has been shown as Rs. 0.48 Crore. CSLDC should clarify the discrepancy.

Reply: CSLDC would like to submit that it has inadvertently submitted in Para 4.33 Non-Tariff Income of Rs. 0.24 Crores in place of Rs. 0.48 Crore. Non-Tariff income as per balance sheet is Rs. 0.48 Crore only.

16. CSLDC should submit the detailed head-wise break-up of Non-Tariff Income of Rs. 0.48 Crore claimed in Para 4.34 of the Petition.

Reply: The details of Non-Tariff income is shown as under:

S. No.	Particulars	Amount in Rs Crore
1	SLDC operation charges	0.4139
2	REC charges	0.0543
3	NOC for STOA	0.0145
	Total (in Rs. Crore)	0.48

17. CSLDC has not stated the actual Revenue billed and the computation of the Revenue Gap/(Surplus) after true-up has also not been provided in the Petition. CSLDC should submit the details of actual Revenue billed and the computation of the Revenue Gap/(Surplus) after true-up for FY 2023-24.

Reply: CSLDC would like to submit that it has actually billed Rs. 17.00 Crore as SLDC Charges. Further the computation of Revenue gap /(Surplus) after true-up for FY 2023-24 is shown as under:

Sr. No	Particulars	FY 2023-24 (Rs. Crore)
1	ARR	18.68
2	Revenue from SLDC Charges	17.00
3	Previous Surplus/(Deficit) adjusted with carrying cost up to FY 2023-24 as approved in Tariff Order	2.55
4	Total Revenue	19.55
5	Surplus / (Deficit)	0.87

C. Determination of ARR and Tariff for FY 2025-26

18. CSLDC has claimed Opening GFA of Rs. 42.78 Crore for FY 2025-26 and GFA addition of Rs. 97.30 Crore in FY 2025-26. In this regard:

- a. For considering the Opening GFA as Rs. 42.78 Crore, CSLDC has considered the GFA addition in FY 2024-25 as Rs. 20.52 Crore, though the Capitalisation approved for FY 2024-25 is only Rs. 10.76 Crore. CSLDC should justify the GFA addition of Rs. 20.52 Crore considered for FY 2024-25.

Reply: CSLDC would like to submit the revised numbers for capitalization for FY 2024-25 as approved by the commission i.e. Rs. 10.76 Crore. Now the updated numbers are as follows:

S.No.	GFA Particular	FY 2023-24 Petition (As Per Audited Accounts)	FY 2024-25	FY 2025-26
1	Opening GFA	17.33	22.26	33.02
2	Add: Capitalization During the Year	4.93	10.76	102.90
3	Closing GFA	22.26	33.02	135.92

- b. CSLDC has sought approval for Capex of Rs. 113.66 Crore in its CIP Petition, against which CSLDC has claimed Capitalisation of Rs. 97.30 Crore in the Tariff Petition.
 - i. CSLDC should submit the scheme-wise Capitalisation proposed for FY 2025-26, totaling to Rs. 97.30 Crore.

Reply: CSLDC would like to submit the revised numbers for capitalization for FY 2024-25 as approved by the commission, therefore the proposed capitalization have also been updated accordingly. Now the capitalisation proposed for FY 2025-26 is totalling Rs. 102.90 Crore. The updated numbers have been provided in response to query number 18 part (a).

Further the scheme wise capitalisation proposed for FY 2024-26 have been annexed in **Annexure C18(b)** having a total outlay of 113.66 Crore.

- ii. CSLDC should submit the status of its preparedness to undertake each Capex scheme proposed in the CIP, to justify the projected capitalisation of Rs. 97.30 Crore in FY 2025-26.

Reply: CSLDC would like to submit that it is fully capable and prepared to undertake the proposed Capex schemes detailed in the CIP for FY 2025-26. The updated projected capitalisation of ₹102.90 crore has been meticulously planned to address the current and future operational needs of the SLDC, ensuring its seamless and efficient functioning.

A significant portion of this capital investment is earmarked for software-based solutions such as SCADA (Supervisory Control and Data Acquisition) and SAMAST (Scheduling, Accounting, Metering, and Settlement of Transactions), which are critical for the real-time monitoring, control, and efficient management of grid operations. These systems will enhance CSLDC's ability to handle increasing grid complexities, improve data analytics, and facilitate better decision-making, thereby aligning with the evolving demands of the power sector.

Furthermore, CSLDC has taken proactive measures to ensure readiness for the execution of these schemes, including capacity building, infrastructure planning, and stakeholder engagement, to ensure timely and effective implementation.

19. The language used in Para 5.6 of the Petition is from the MYT Petition filed by CSLDC in November/December 2022, and the interest rate has been stated as applicable for FY 2020-21, though the interest rate of FY 2023-24 has been considered. CSLDC should clarify the discrepancy.

Reply: CSLDC would like to submit that this is an inadvertent error which we have rectified in the revised Petition submitted along with this response.

20. In Table 4 below Para 5.6, the values of repayment and loan addition have been interchanged, as repayment has been shown as Rs. 68.11 Crore and loan addition has been shown as Rs. 4.81 Crore. CSLDC should rectify the error and re-submit the corrected Table.

Reply: The revised table is submitted along with the revised Petition.

21. With reference to Query 9(b) above, the interest rate on long-term loan to be considered appears to be 9.32% [or 2.57% if interest subsidy is considered] as considered by CSPTCL, instead of 10.95% considered by CSLDC. CSLDC should clarify this discrepancy and submit the revised computation of interest on long-term loan for FY 2025-26.

Reply: CSLDC would like to submit that weighted average rate of Interest is calculated at 9.32% for arriving interest expense for the period.

22. CSLDC has claimed R&M expenses of Rs.1.47 Crore for FY 2025-26, though it has claimed Nil R&M expenses in the true-up of FY 2023-24. CSLDC should justify the same

Reply: CSLDC would like to submit that it has rectified the error and considered Rs. 1.64 Crore as R&M Expense for FY 2023-24 and basis that it has recomputed the R&M Expenses for FY 2025-26 has been explained in query number 10 above along with the Model.

23. In the Para below Para 5.2 and Table 3 (incorrectly numbered as Table 3), CSLDC has stated that the actual employee expenses, A&G expenses and R&M expenses of FY 2023-24 have been escalated twice to arrive at the expenses for FY 2025-26. In this regard:

- a. CSLDC has claimed that it has escalated the actual R&M expenses of FY 2023-24 twice to arrive at the R&M expenses for FY 2025-26. However, CSLDC has claimed Nil R&M expenses for FY 2023-24. CSLDC should clarify the discrepancy.
- b. It is observed from the Excel Model that CSLDC has not computed the employee expenses, A&G expenses and R&M expenses for FY 2025-26 in the above manner. CSLDC has escalated the O&M expenses approved for FY 2024-25 with escalation for 1 year. CSLDC should clarify its approach in this matter
- c. CSLDC should submit the details and basis of the escalation indices considered for computing the O&M expenses for FY 2025-26.

Reply:

- a.** Revised R&M of Rs. 1.64 Crore is furnished and therefore the revised computation is shared along with the model.
- b.** Revised computation for working O&M expense is attached along with the revised Model.
- c.** CSLDC would like to submit that it has considered the following escalation index for projecting the Employee Expenses, A&G Expense and R&M Expenses.

Employee Expenses: 5.78% Escalation basis last 5-year average increase in Consumer Price Index Industrial Worker (CPI (IW)) on year to year basis.

A&G Expenses: 5.58% Escalation basis last five-year average increase / decrease in inflation considered on the basis of 40% weightage of WPI and 60% weightage of CPI on year to year basis.

R&M Expenses: 4.93% Escalation basis last 5-year average increase in Wholesale Price Index on year-to-year basis.

24. CSLDC has claimed Terminal Benefits of Rs. 3.85 Crore for FY 2025-26 based on valuation. CSLDC should submit the supporting documentary evidence for the claim of Rs. 3.85 Crore against Terminal Benefits

Reply: CSLDC would like to submit the documentary evidence in **Annexure C24**

25. In Table 14, while computing the Working Capital requirement, CSLDC has linked the Receivables to the standalone ARR of FY 2025-26, instead of the cumulative ARR claimed, after adjusting for Gap/(Surplus) after true-up for FY 2023-24, and considering Receivables equivalent to 1 month instead of 45 days. CSLDC should submit the revised corrected computations of working capital requirement and IoWC for FY 2025-26, based on:
- Receivables equivalent to 30 days instead of 45 days.
 - Receivables linked to cumulative ARR claimed, after adjusting for Gap/(Surplus) after true-up for FY 2023-24.

Reply: CSLDC submit that it has inadvertently considered receivables equivalent to 45 days instead of one month and linked it to ARR instead to actual revenue. The revised calculation after rectifying the error is shown as under:

S. No.	Interest on Working Capital	FY 2025-26
	Particular	Rs. Crore
1	O&M Expenses (15 days)	0.60
2	Spares - 20% of M&G Expenses	0.48
3	Receivables	2.54
4	Total WC Requirement	3.62
5	Rate of Interest on WC	10.95%
6	Interest on WC	0.40

26. In Table 8 (appearing after Table 16) of the Petition, in the first row, CSLDC has given the nomenclature as ‘ARR for FY 2024-25 approved’ instead of “ARR for FY 2025-26 projected by CSLDC”, as there is no approved ARR for FY 2025-26, unlike earlier years, when the ARR for the year was approved in the MYT Order. CSLDC should correct the nomenclature to avoid confusion.

Reply: CSLDC has furnished the revised Petition along with the responses.

Chief Engineer (SLDC)
C.S. Power Trans. Co. Ltd.
Raipur

Enclosed:- As Above