

BEFORE THE
HON'BLE CHHATTISGARH STATE ELECTRICITY REGULATORY COMMISSION
RAIPUR

IN THE MATTER OF: Additional Submission to Petition No. 46/2022 data gaps communicated vide letter dated 18.08.2022 with Letter No. P. No. 46 of 2022/2022/1218

PETITIONER: Jindal Steel and Power Limited (JSPL-D)
Raigarh, Chhattisgarh.

JSPL-D has filed an application before Hon'ble CSERC for approval of Annual Revenue Requirement for MYT Control Period of FY 2022-23, FY 2023-24 and FY 2024-25 along with revised estimate for FY 2021-22 and True-up for FY 2019-20, FY 2020-21 for the licensed distribution business which has been registered as Petition No. 46 of 2022.

The Hon'ble Commission vide daily Order dated 21.07.2022 has merged the Petitions No. 62/2018, 33/2020, 07/2021 and 14/2021 with 46/2022 to determine the tariff for the Petitioner from FY 2011-12 to comply with the direction of Hon'ble APTEL in Judgement dated 06.05.2022 in Appeal No. 72 and 100 of 2016.

Subsequently, a technical validation session in the above matter was held at the Hon'ble Commission's office on 26.07.2022 and the Hon'ble Commission has also sought additional information vide its letter dated 26.07.2022 from the Petitioner. The Petitioner has submitted the replies vide its response dated 04.08.2022. The Hon'ble Commission has further sought data gaps vide its letter dated 18.08.2022. The Petitioner is hereby submitting the replies as follows:

THE HUMBLE PETITIONER ABOVE NAMED MOST RESPECTFULLY SHEWETH:

The Petitioner humbly submits the following in response to the Hon'ble Commission's letter dated 18.08.2022.

A. Distribution Tariff related

- 1. JSPL-D has submitted only annual average tariff. The category wise tariff applicable for different periods and the corresponding sales in MU needs to be submitted for FY 2011-12 to FY 2020-21**

Reply:

Since the tariff of JSPL was not yet determined by the Hon'ble Commission, hence beneficiaries were billed on a uniform rate. The Hon'ble Commission is requested to kindly consider the data as submitted in ARR.

2. **Details of monthly input energy to Industrial Park and energy sold to JSPL-D's consumers, with the details of Distribution Loss and Transmission Loss (separately) for the period from FY 2011-12 to FY 2020-21.**

Reply:

The available data and the details of monthly input energy to Industrial Park and energy sold to JSPL-D's consumers along with T&D Loss has already been provided. The Hon'ble Commission is requested to kindly consider the same.

B. Surplus Power of Raigarh CPP and Dongamahua CPP

1. **JSPL-D should submit daily data of unit wise captive consumption from Raigarh CPP and Dongamahua CPP from FY 2011-12 to FY 2020-21 in MS Excel**
 - a. **There is “#Ref error” in certain cell in sheet name “kWh Units Gen Sale & Self Cons” for FY 2011-12 (Annexure-5.1)**

Reply:

A clean copy of **Annexure 5.1** is attached for consideration of Hon'ble Commission. The MS Excel formats have been shared with the Hon'ble Commission vide e-mail zulfeqar.ali@jindalsteel.com dated 02.09.2022.

- b. **In CPP-1 data for FY 2014-15 (Annexure-5.4) and in CPP-2 data for FY 2020-21, the sheet name and header content are not understood due to font mismatch.**

Reply:

The relevant font has been shared with the Hon'ble Commission vide e-mail from zulfeqar.ali@jindalsteel.com dated 02.09.2022 as Annexure-1b. The Hon'ble Commission is requested to kindly install the same and hopefully it shall resolve the issue. In case the issue is not resolved we shall share hard copy of the same upon intimation..

2. **JSPL-D should submit the daily data of energy sold to different entities from Raigarh CPP and Dongamahua CPP from FY 2011-12 to FY 2020-21 in MS Excel.**

Reply:

The available Monthly and yearly data of energy sold to different entities from Raigarh CPP and Dongamahua CPP from FY 2011-12 to FY 2020-21 in MS Excel formats have already been shared as Annexure 5 in MS Excel Format with the Hon'ble Commission vide e-mail zulfeqar.ali@jindalsteel.com dated 04.08.2022. The Hon'ble Commission is requested to kindly consider the same.

- a) **There is “#Ref error” in certain cell in sheet name “kWh Units Gen Sale & Self Cons” for FY 2011-12 (Annexure-5.1)**

Reply:

A clean copy of **Annexure 5.1** is attached for consideration of Hon'ble Commission. The MS Excel formats have been shared with the Hon'ble Commission vide e-mail zulfeqar.ali@jindalsteel.com dated 02.09.2022.

- b.) **In CPP-1 data for FY 2014-15 (Annexure-5.4) and in CPP-2 data for FY 2020-21, the sheet name and header content are not understood due to font mismatch.**

Reply:

b) The relevant font has been shared with the Hon'ble Commission vide e-mail from zulfeqar.ali@jindalsteel.com dated 02.09.2022 as Annexure-1b. The Hon'ble Commission is requested to kindly install the same and hopefully it shall resolve the issue. In case the issue is not resolved we shall share hard copy of the same upon intimation.

3. **JSPL-D should submit the Copy of G-form for Raigarh CPP and Dongamahua CPP submitted to CEI along with All annexures, for the period from April 2011 to March 2021 (monthly & Consolidated) for each Financial year)**

- a. **The headings in the soft copy are not understood due to font mismatch.**

Reply: The relevant font has been shared with the Hon'ble Commission vide e-mail from zulfeqar.ali@jindalsteel.com dated 02.09.2022. The Hon'ble Commission is requested to kindly install the same and hopefully it shall resolve the issue. In case the issue is not resolved we shall share hard copy of the same upon intimation.

- b. **Scanned copy of the actual submissions should also be submitted.**

Reply: The Scanned copies has been shared with the Hon'ble Commission vide e-mail from zulfeqar.ali@jindalsteel.com dated 02.09.2022. The Hon'ble Commission is requested to kindly consider the same.

C. Generation Tariff related:

1. **JSPL D should submit petition for Raigarh CPP and Dongamahua CPP immediately.**

Reply: It is submitted that the Hon'ble Commission has taken suo-moto initiative for determination of generation cost of Dongamahua and Raigarh CPP and has registered the cases as Petition No. 60 of 2022 and 61 of 2022 respectively. The Hon'ble Commission has also sought similar information in this regard under the respective Petitions. It is humbly submitted that as per our submissions made before this Hon'ble Commission, data pertaining to generation cost of DCPD has been filed by JSPL-D for the period it has supplied power from DCPD vide (i) True-Up Petition for FY 2016-17 filed in Petition No. 62 of 2018 ; (ii) True-Up Petition for FY 2017-18 filed in Petition No. 33 of 2020 and (iii) True-Up Petition for FY 2018-19 filed in Petition 07 of 2021 for the period (01.04.2018 to 31.05.2018). With regards to cost of generation of Raigarh CPP, it is submitted that JSPL-D has not procured power for its distribution business from RCPD.

D. Additional Data requirement.

1. **For FY 2011-12, FY-2012-13 and FY 2013-14, some pages of the audited accounts are blurred and dark and thus not legible. Clear scanned copies of the Audited Accounts for these 3 years need to be submitted.**

Reply: Clear scanned copies of the Audited Accounts for these 3 years are attached as annexure-D-1 and have been shared with the Hon'ble Commission vide e-mail from zulfeqar.ali@jindalsteel.com dated 02.09.2022.

The Hon'ble Commission is requested to kindly accept the above submissions of the Petitioner and condone any inadvertent omissions/ errors/ shortcomings/ delays and permit to make further submissions as may be required at a future date to support this Petition in terms of modification / clarification.

Place: Raigarh
Date: 02.09.2022

For Jindal Steel & Power Limited

Authorised Signatory