BEFORE THE

HON'BLE CHHATTISGARH STATE ELECTRICITY REGULATORY COMMISSION

RAIPUR

IN THE MATTER OF:	Submission of reply by JSPL to the additional information sought by CSERC vide its letter no.101 of 2023/2024/183 dated 02-02-2024 in Petition No.101 of 2023.
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 FY 2024-25 along with revised estimate for FY 2023-24 and True-up for FY 2022-23 for the licensed distribution business which has been registered as Petition No. 101 of 2023.

The Hon'ble Commission has sought data gaps vide its letter dated 02.02.2024 and has directed the Petitioner to submit the additional information by 19.02.2024. 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 02.02.2024.

A. True-Up of FY 2022-23

1. **JSPL-D should explain the reasons for reduction in category-wise Sales in FY 2022-23 as compared to actual Sales in FY 2021-22.**

Reply:

The Petitioner submits that the category wise sales (In MU) are as following:

Particular	FY 2021-22	FY 2022-23
LT		
Demand Based	0.37	0.46
Non-Domestic	0.14	0.15

For, Jindal Steel & Power Limited

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Particular	FY 2021-22	FY 2022-23
11 kV		
Steel Industries	37.19	35.05
Other General Purpose	1.13	1.63
33 kV		
Steel Industries	1188.28	1128.22
Other Industries	13.24	14.05
Total	**1240.35**	**1179.56**

It is pertinent to mention that from above table, in the steel industries category, there are reduction in sales due to decrease in demand from market.

2. **As regards Energy Balance shown in Table 3 and R4 Sheet of Model, the Energy Requirement/Power Purchase quantum is shown as 1190.49 MU, whereas the power purchase quantum is shown as 1191.80 MU in Note 11 of the Audited Accounts. JSPL-D should reconcile the figures of Energy Requirement/Power Purchase for FY 2022-23.**

Reply:

The petitioner requests the Hon'ble Commission to consider the Power Purchase quantum show in the Audited Accounts.

The petitioner submits the Energy balance for FY 2022-23 as following:

Particulars	Units	FY 2022-23
Energy Sales by JSPL-D	MU	1179.56
Distribution loss (%)	%	0.44%
Distribution loss	MU	5.16
Energy delivered at Distribution periphery	MU	1184.72
Transmission Loss (%)	%	0.59%
Transmission Loss	MU	7.08

For, Jindal Steel & Power Limited

Authorised Signatory

Particulars	Units	FY 2022-23
Energy Requirement at Transmission Periphery	MU	1191.80

3. **JSPL-D should provide the details of competitive bidding undertaken for purchase of power from JPL at the rate of Rs. 6/kWh from 01.04.2022 to 20.07.2022 with documentary evidence.**

   Reply:

   The Petitioner has purchased power from JPL to meet its requirement in FY 22-23 from 01.04.22 to 20.07.2022. The Petitioner invited bids for supply of 200 MW (+/-10%) power for the period of 01.04.2022 to 20.07.2022. Three bidders participated in the bid process and quoted the following rates.

Sl. No.	Parties Participated	Quantum (MW)	Quoted Rate (INR/kWh)
1	JPL	200	8.70
2	DB Power	200	9.10
3	JITPL	200	14.00

JPL emerged as the successful bidder and the price was further negotiated. Finally, JPL agreed to supply power at Rs. 6.00/kWh which was lower than the earlier quoted price. The LoI issued to JPL for 75 MW is attached as **Annexure-1 (A-3)** for ready reference. The Hon'ble Commission is requested to kindly consider the same.

4. **JSPL-D should provide the details of competitive bidding undertaken for purchase of power @ Rs. 5.50/kWh from 21.07.2022 to 31.03.2023 with documentary evidence**

   Reply:

   The Petitioner has purchased power from JPL to meet its requirement in FY 22-23 from 21.07.22 to 31.03.2023. The Petitioner invited bids for supply of 150 MW (+/-10%) power for the period of 21.07.2022 to 31.03.2023. Three bidders participated in the bid process and quoted the following rates.

Sl. No.	Parties Participated	Quantum (MW)	Quoted Rate (INR/kWh)
1	JPL	150	5.50
2	Manikaran	150	6.25

For, Jindal Steel & Power Limited

Authorised Signatory

Sl. No.	Parties Participated	Quantum (MW)	Quoted Rate (INR/kWh)
3	Tata Power Trading	150	15.00

JPL emerged as the successful bidder and agreed to supply power at Rs. 5.50/kWh. The LoI issued to JPL is attached as **Annexure-2 (A-4)** for ready reference. The Hon'ble Commission is requested to kindly consider the same.

5. **JSPL-D should clarify whether the Commission has approved the PPA with JPL for purchase at the rate of Rs. 6/kWh from 01.04.2022 to 20.07.2022.**

Reply:

It is submitted that the Petitioner has purchased power for FY 22-23 from 01.04.2022 to 20.07.2022 through transparent competitive bidding process. As per Section 63 of the Electricity Act, 2003 the Hon'ble Commission is requested to kindly adopt the tariff discovered through competitive bidding.

6. **The power purchase cost has been shown as Rs. 687.84 Crore in 'R4 sheet' of the Model, whereas the power purchase cost has been shown as Rs. 666.27 Crore in Table 4 of the Petition and Note 11 of the Audited Accounts. JSPL-D should reconcile the power purchase cost for FY 2022-23.**

Reply:

The petitioner submits that the power purchase cost shown as INR 687.84 Cr. in "R4 sheet" is inclusive of the RPO cost. The Power Purchase cost excluding the RPO cost is INR 666.27 Cr. The Petitioner submits the power purchase cost excluding RPO cost for FY 2022-23 as following:

Power Purchase (MU)	Total Amount (In Cr.)	Avg Rate (INR/kWH)
1191.81	666.27	5.59

7. **JSPL-D has not provided the details of quantum of power purchase under different LOIs for FY 2022-23. JSPL-D should provide the required data in the following format:**

For, Jindal Steel & Power Limited

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Sl.	Particulars	Quantum (MU)	Rate (Rs/kWh)	Cost (Rs. Crore)
1	Purchase from JPL from 01.04.2022 to 20.07.2022		6.00	
2	Purchase from JPL from 21.07.2022 to 31.03.2023		5.50	
	Total			

Reply:

The petitioner submits required data as following:

Sl.	Particulars	Quantum (MU)	Rate (Rs/kWh)	Cost (Rs. Crore)
1	Purchase from JPL from 01.04.2022 to 20.07.2022	214.02	6.00	128.41
2	Purchase from JPL from 21.07.2022 to 31.03.2023	977.78	5.50	537.78
	Total	**1191.80**		**666.19**

8. **JSPL-D has stated that copy of Letter of Intent issued to JPL for purchase of power from 01.04.2022 to 20.07.2022 is provided at Annexure-IV. However, Annexure-IV is the LOI for purchase of power for August and September 2023. JSPL-D should submit the copy of LOI for purchase of power from 01.04.2022 to 20.07.2022.**

Reply:

The LoI issued to JPL is attached as **Annexure-3 (A-8)** for reference.

9. **JSPL-D should submit Annexure-V, stated as LOI for power purchase for the period from 21.07.2022 to 31.03.2023, as stated in Para 58 of Petition.**

Reply:

For, Jindal Steel & Power Limited

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The LoI issued to JPL is attached as **Annexure-4 (A-9)** for reference.

10. As regards RPO expenses of Rs. 22.84 Crore claimed by JSPL-D for FY 2022-23, JSPL should

a. Indicate where the expenses of Rs. 22.84 Crore is reflected in the Audited Accounts of FY 2022-23.

b. submit the details of REC's purchased including quantum and rate.

c. Submit the copies of RECs issued by the Power Exchanges against which JSPL-D has claimed RPO cost of Rs. 22.84 Crore.

Reply:

a) The Petitioner submits the details reconciliation as under:
Provision as on 31 Mar 2022 Rs. 138.21 Cr. (Ref .Note- 9.2)
Provision as on 31 Mar 2023 Rs.105.02 Cr. (Ref .Note- 9.2)

Provision Reversal Rs. 33.19 Cr.

Expenses made Rs. 22.84 Cr

Other adjustment 0.05 Cr

Difference is booked under Income 10.40 (Ref. Note- 10.b)

(Ref. Note refers to Audited Books of Accounts).

b) REC's purchased including quantum and rate.

REC - Distribution Licensee Area -OPJIP in FY 22-23

Sr.No	Date of Purchase	REC Type	REC Qty	Rate	Amount Cr with GST + Exchange fee
1	27-Apr-22	Non-Solar	51345	1000	6.18
2	27-Apr-22	Solar	14670	2300	4.02
3	25-May-22	Non-Solar	8100	1000	0.97
4	29-Jun-22	Non-Solar	4300	1000	0.52
5	27-Jul-22	Non-Solar	33170	1000	7.53
6	27-Jul-22	Solar	26760	1100	
7	30-Aug-22	Non-Solar	24591	1000	3.92
8	30-Aug-22	Solar	7989	1000	
					23.14

c) RECs issued by the Power Exchanges against which JSPL-D has claimed RPO cost of Rs. 22.84 Crore is attached as Annexure- **Annexure-5 (A-10 c).**

For, Jindal Steel & Power Limited

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The petitioner requests Hon'ble Commission to consider the same.

11. JSPL-D should submit the letter from CREDA certifying the RPO compliance as per applicable RPO target for FY 2022-23.

Reply:

REC were purchased in FY 22-23 for previous years. The petitioner submits that in FY 2022-23, the RPO actual purchase is considered. The details excel are attached as **Annexure-5.1 (A-11).**

12. JSPL-D has claimed GFA addition of Rs. 2.43 Crore against Rs. 0.50 Crore claimed in the MYT Petition and 'Nil' amount approved in the MYT Order. In this regard, JSPL-D should

a. Justify the actual GFA addition claimed vis-à-vis the GFA addition of Rs. 0.50 Crore claimed in MYT Petition.

b. Submit the scheme-wise details of asset addition for FY 2022-23.

c. Reconcile the GFA addition of Rs. 2.43 Crore claimed in the Petition with the GFA addition of Rs. 0.93 Crore shown in the Audited Accounts, which is against Buildings only.

Reply:

The Hon'ble Commission in Order dated 28.11.2022 has approved the GFA for FY 2022-23. However, the Petitioner has observed that the same is not consistent with the figures of the annual audited accounts even after considering the disallowance approved in the Orders and excluding the IND-AS adjustment. Therefore, the Petitioner has considered the opening Gross Fixed Asset as per the following methodology:

a. Value of Leasehold land has been considered as Rs. 32.27 Lakh as per audited annual accounts for FY 2022-23

b. Value of Building has been considered as Rs. 485 Lakh after addition of 93 lakhs during FY 2022-23.

c. Value of Transformers has been considered at Rs. 1,343.57 Lakh as approved by the Hon'ble Commission in Order dated 08.02.2012, in which Hon'ble

For, Jindal Steel & Power Limited

Y. K. ANAND

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Commission felt that two transformers are enough to cater to the load considering the Maximum Demand prevailing at that time and accordingly, allowed the cost pertaining to two Power Transformers on pro-rata basis.

d. Value of Switchgears, Control gear & Protection equipment including cable has been considered to be Rs. 5.34 Cr. as claimed by the Petitioner in its earlier Petition. The cost of Air Quality Monitoring System amounting to Rs. 25.55 Lakh has not been included under this head as the same has been disallowed in Order dated 28.11.2022.

e. Cost of line, cable networks has been considered to be Rs. 1.94 Cr. as claimed by the Petitioner in its earlier Petition. For every consecutive year, for line maintenance Rs. 1.5 Crore is added till FY 2024-25.

f. The cost of SCADA has been considered to be Rs. 246.38 Lakh as approved by the Hon'ble Commission in Orders dated 08.02.2012 and 28.11.2022.

g. The cost of vehicles has been considered as Rs. 0.47 Lakh, Office Equipment as Rs. 0.74 Lakh, Furniture & Fixtures as Rs. 1.20 Lakh, Air Conditioner as Rs. 8.14 Lakh and Computers as Rs. 0.67 Lakh in line with the Annual Audited Accounts for FY 2021-22

The Petitioner has considered the addition to Gross Fixed Asset during FY 2022-23 as per the following methodology:

a. The differential cost of the transformers, disallowed by the Hon'ble Commission amounting to Rs. 5.30 Cr. has been considered towards use of 3rd transformer disallowed by the Hon'ble Commission in Order dated 08.02.2012 and **Rs. 5.23 Cr. towards installation of another transformer 220/33/11KV,120MVA capacity during FY 2021-22** for meeting the load of the consumers and thereby maintaining the reliability in supply.

    i. The Hon'ble Commission in Order dated 08.02.2012 allowed the cost towards use of two Power Transformers for meeting the maximum demand of 70.03 MW prevailing during FY 2007-08 to FY 2010-11.

    ii. Since then, the Hon'ble Commission has not allowed any addition to the number of transformers. In the said Order the Hon'ble Commission opined that considering the Maximum Demand, the Commission feels that two transformers are enough to cater to the load and hence, the cost pertaining to two Power Transformers can be allowed to JSPL-D as a part of Fixed Assets, which is equal to Rs. 1,343.57 Lakh on pro-rata basis.

    iii. The Petitioner in its Petition No. 46 of 2022 had submitted the contract demand to be ~248 MVA for FY 2020-21 which in FY 2021-22 has increased to ~258 MVA. So, it may be inferred that the two Power

For, Jindal Steel & Power Limited

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transformers which were earlier approved by the Hon'ble Commission for meeting maximum demand of 70.03 MW in FY 2011-12 shall not be able to handle the enhanced load which is more than three times the earlier approved load.

iv. The Petitioner was operating two 120 MVA transformers in parallel which were sharing the load equally. In case of failure of either of the Transformers, the process of repair and reinstallation takes of transformer usually takes 2-3 months. In order to ensure that supply of power to consumers is not affected, JSPL-D used 3rd Transformer as standby transformer to take care of tripping and outages. However, the Hon'ble Commission has never approved the cost of the 3rd transformer used by the Petitioner for ensuring reliability of supply for its high value industrial consumers. It has resulted in approval of non-cost reflective tariff by the Hon'ble Commission.

v. The Petitioner has further capitalised another Power Transformer and added the same to its GFA base increasing the total number of Power Transformers to four (4) in FY 2021-22.

b. The Petitioner has capitalised Rs. 316.35 Lakh in FY 2020-21, Rs. 179.31 Lakh in FY 2021-22 and 93.91 Lakh in FY 202-23 **towards network augmentation.**

c. The deletion of assets has been considered as per the annual audited accounts for the respective years.

The Hon'ble Commission is requested to kindly consider the opening and addition of Gross Fixed Asset as discussed above. All the above-mentioned assets are currently in use and are contributing to providing reliable supply to the consumers. Further, clarifications / justifications / supporting details regarding the GFA shall be provided as and when required.

The Hon'ble Commission may appreciate that even after disallowance of the cost of Power Transformers in Order dated 08.02.2012, the Petitioner has been using the 3rd Transformer for maintaining reliability of supply to the consumers. However, the Petitioner is no longer in a position to use the standby 3rd Power Transformer in absence of approval of investment in this regard. In view of the same, the Hon'ble Commission is requested to kindly clearly mention the reasons for disallowing any cost incurred towards creation of Fixed Asset by the Petitioner. The Petitioner shall proceed to dismantle such disallowed Fixed Asset from the existing distribution system. The Hon'ble Commission is requested that the Petitioner may not be held responsible for any inconvenience caused to the consumers due to removal of such disallowed Fixed Asset from the existing distribution system.

For, Jindal Steel & Power Limited

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The Petitioner humbly prays before the Hon'ble Commission to kindly approve the Gross Fixed Assets as per the segregated audited accounts for this true-up exercise.

GFA for FY 2022-23 (Rs. Cr.)

Sl. No.	Particulars	Opening	Addition	Deletion	Closing
1	Lease hold Land	0.32			0.32
2	Building	3.92	.93		4.85
3	Power & Distribution Transformers	23.97			23.97
4	Switchgears, Control gear & Protection equipment including cable	5.34			5.34
5	Lines & cable networks	6.90	1.50		8.40
6	SCADA	2.46			2.46
7	Vehicles	0.005			0.005
8	Furniture and fixtures	0.01			0.01
9	Computers	0.00			0.00
10	Office equipment	0.007			0.007
11	Air Conditioner	0.081			0.081
	Total	**43.02**	**15.49**	**0.01**	**45.45**

13. As regards interest on loan claimed for FY 2022-23, JSPL-D should

a. Submit the computation of actual weighted average interest rate of 9% for FY 2022-23, as stated in Para 71 of the Petition.

b. Clarify where the actual interest expenses on long-term loan are reported in the Audited Accounts for FY 2022-23.

Reply:

The Petitioner has calculated interest on the aforesaid normative loan at the actual weighted average rate of interest available for FY 2022-23 as per Regulation 24.5. The detailed calculation for interest on normative loan is provided in the table given below:

Table 1: Interest on normative loan for FY 2022-23 (Rs. Cr.)

Particulars	Amount
Opening Net Normative loan	12.96
Addition of normative loan	1.70
Repayment of normative loan during the year	1.94
Reduction in Normative loan	0.00
Closing Net Normative loan	12.72
Average Normative loan	12.84
Weighted Average Rate of Interest	9.00%
Interest on Loan Capital	**1.16**

The petitioner submits that the Interest Rate considered as same as the FY 2021-22.

The petitioner submits that there is no long-term interest shown in the Audited Accounts.

For, Jindal Steel & Power Limited

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14. **As regards A&G expenses of Rs. 7.53 Crore claimed by JSPL-D in the true-up for FY 2022-23, JSPL-D should**
    a. Reconcile the A&G expenses of Rs. 7.53 Crore claimed in the Petition with the total A&G expenses of Rs. 8.20 Crore reported in Note 12.3 of the Audited Accounts.
    b. Submit the head-wise break-up of 'Corporate Expenses' of Rs. 5.57 Crore as per Note 12.3 of Audited Accounts.
    c. Submit the head-wise break-up of 'Others' Expenses of Rs. 0.75 Crore as per Note 12.3 of Audited Accounts.
    d. Submit the head-wise break-up of 'Social Welfare' Expenses of Rs. 0.45 Crore as per Note 12.3 of Audited Accounts.
    e. Submit the details of expenses claimed against 'Meter rent & other charges' of Rs. 0.22 Crore as per Note 12.3 of Audited Accounts.

Reply:

The Petitioner claimed the Normative A&G expense of INR 2.60 Cr. for the period of FY 2022-23 as per the MYT Regulation 2021.

15. **JSPL-D has added the amount of 'Sharing of Gains or losses on account of Controllable Factors' as Rs. 4.48 Crore in Para 81 and Table 15 of the Petition. In this regard, JSPL-D should**
    a. Reconcile the amount with sharing of gain/loss of Rs. 4.77 Crore shown in Form S4 of Financial Model/Formats.
    b. JSPL-D has proposed to pass on 2/3rd of the efficiency loss of Rs. 6.78 Crore in the ARR; however, the CSERC MYT Regulations, 2021 allow only 1/3rd of the efficiency losses to be passed on to the consumers. JSPL-D should submit the revised computations of sharing of losses and ARR based on the CSERC MYT Regulations, 2021.

    Reply

For, Jindal Steel & Power Limited

Y Tandon

Authorised Signatory

It is submitted that the Sharing of Gain/loss has been inadvertently mentioned in the formats as well as petition. The petitioner submits the revised sharing of gain or losses as following:

FY 22-23			Sharing of Gain or Losses on account of Controllable Factor
Normative	**Actual**	**(-)Gain / Loss**	
6.44	6.44	0.00	**2.24**
2.60	7.53	4.93	
0.66	2.51	1.85	
9.70	**16.49**	**6.78**	

The Petitioner requests the Hon'ble Commission to consider the above computation.

16. As regards the revenue from sale of electricity, JSPL-D should

a. **Submit the details of category-wise tariff applicable/levied, with break-up of Fixed/Demand Charges and Energy Charges, for different periods during the year.**

b. **Submit the details of category-wise revenue in the following format:**

Sl.	Category	Sales (MU)	Revenue from Fixed/Demand Charges (Rs. Crore)	Revenue from Energy Charges (Rs. Crore)	Total Revenue (Rs. Crore)	Average Billing Rate (Rs/kWh)
A	LT Category					
1						
2						
...						
B	11 kV					
...						
...						
C	33 kV					
1						
2						
	Total					

For, Jindal Steel & Power Limited

Authorised Signatory

c. Submit the details of income of Rs. 4.82 Crore from sale to other business of JSPL including Units sold in MU and rate of sale of power.

Reply:

The Petitioner submits that details Category wise sales & Revenue for FY 2022-23 as following:

Sl.	Category	Sales (MU) or Million kVAh	Contract Demand (kVA)	Energy Charges (Rs/ kWh) or (Rs/ kVAh)	Revenue from Fixed/ Demand Charges (Rs. Crore)	Revenue from Energy Charges (Rs. Crore)	Total Revenue (Rs. Crore)	Average Billing Rate (Rs/kWh)
A	**LT Category**							
1	Non Domestic	0.46	115	3.75	0.00	0.17	0.17	3.75
2	Demand based	0.15	90	4	0.00	0.06	0.06	4.00
B	**11 kV**							
1	Steel Industries	35.05	6200	4.71	0.00	16.51	16.51	4.71
2	Other General Purpose	1.63	1000	4.71	0.00	0.77	0.77	4.71
C	**33 kV**							
1	Steel industries	1128.22	288600	4.71	0.00	531.19	531.19	4.71
2	Other industries	14.05	3000	4.7	0.00	6.60	6.60	4.70
	Total	**1179.56**	**299005**		**0.00**	**555.30**	**555.30**	**4.71**

It is submitted that the Petitioner has earned Rs. 4.82 Cr. by selling 10.52 MU @4.58 per unit of power to other business entities of JSPL like Steel Structure Department (SSD).

The Petitioner Submits that the as per the Tariff order for FY 22-23, ACoS of INR 4.20 per unit is applicable for the period from April 2022 to November 2022. From December 2022 to March 2023, the ACoS of INR 5.44 is considered based on APTEL Order.

17. As regards Non-Tariff Income of Rs. 0.48 Crore considered in Para 88 and Table 15 of the Petition, JSPL-D should clarify where the Non-Tariff Income of Rs. 0.48 Crore is reported in the Audited Accounts for FY 2022-23

For, Jindal Steel & Power Limited
Y Tandon
Authorised Signatory

Reply:

The Petitioner submits that the 0.48 Crore reported in trial balance of the Audited Account for FY 2022-23 as following:

Texts	Descriptions	Total Amount
380102	Meter Rent and other charges recovered	1,609,582
380110	Misc.Income	90
340521	Sales Misc - Captive - M	(64,000)
310510	Sales Others - Scrap	3,086,600
380163	Rent Recovered	208,036
Total		4,840,308

18. **JSPL-D should clarify where the income from 'Delayed payment surcharge/interest received from customers' of Rs. 0.12 Crore as per Note 13 of Audited Accounts has been considered in the ARR of JSPL-D.**

Reply:

The petitioner submits that the Delayed Payment Surcharge/Interest received from customers has not been considered in ARR of JSPL-D.

B. Revised ARR and Tariff Determination for FY 2024-25

19. **As regards the category-wise sales projected for FY 2024-25, JSPL-D should submit the data on actual category-wise sales for the first 8 to 9 months of FY 2023-24, i.e., from April 2023 to November/December 2023.**

Reply:

For, Jindal Steel & Power Limited
Y. TANDON
Authorised Signatory

The petitioner submits the actual sales from April 2023 to December 2023 as following:

Particular	Consumptions (MU)
LT	
Demand Based	0.13
Non-Domestic	0.15
11 kV	
Steel Industries	26.20
Other General Purpose	1.21
33 kV	
Steel industries	937.54
Other industries	11.40
Total	**976.63**

20. **JSPL-D should submit details of competitive bidding process followed for medium-term power procurement, along with details of the status of Commission's approval for the same.**

Reply:

The Petitioner is purchasing power from M/s Instinct infra & Power Limited to meet its requirement for 5 years from October 2023.The Petitioner invited bids for supply of 240 MW power for five years in Medium term power procurement. Three bidders participated in the bid process and quoted the following rates.

Sl. No.	Parties Participated	Quantum (MW)	Quoted Rate (INR/kWh)
1	M/s Instinct infra & Power Limited	240	5.05
2	M/s DB Power Limited	100	5.80
3	M/s Tata Power Trading Company Limited	100	6.79

M/s Instinct infra & Power Limited emerged as the successful bidder to supply power at Rs. 5.05/kWh. The LoI issued to M/s Instinct infra & Power Limited is attached as **Annexure-6 (B-20)** for ready reference. The Hon'ble Commission is requested to kindly consider the same.

For, Jindal Steel & Power Limited

Authorised Signatory

The Hon'ble Commission has approved the tariff adoption on medium term power procurement on 10th Dec 2023 in petition No: 50/2022.

21. **JSPL-D should clarify under which provision of the MYT Regulations, 2021 is the revised estimate of all components of the ARR for FY 2024-25 submitted, as the MYT Regulations, 2021 provide for only re-assessment of the sales and power purchase costs, with all other components being considered as approved in the MYT Order.**

Reply:

It is submitted that the Regulation 5.7 (b) (ii) of the Chhattisgarh State Electricity Regulatory Commission (Terms and Conditions for determination of tariff according to Multi-Year Tariff principles and Methodology and Procedure for determination of Expected revenue from Tariff and Charges) Regulations, 2021 provides that following should be covered in the yearly Petition.

a. The truing up petition for preceding year(s).
b. Revised power purchase quantum/cost (if any), with details thereof for the ensuing year.
c. Revenue from existing tariffs and charges and projected revenue for the ensuing year.
d. Application for re-determination of ARR for the ensuing year along-with retail tariff proposal.

In view of the above the Petitioner has filed the True-Up Petition for FY 22-23. For projecting the ARR and revenue gap for the ensuing year i.e. FY 24-25 the ARR for FY 23-24 has been calculated and submitted before the Hon'ble Commission for approval.

22. **JSPL-D should submit the detailed computation of revenue of Rs. 755.30 Crore from existing tariff for FY 2024-25 in the following Format:**

For, Jindal Steel & Power Limited
Authorised Signatory

Sl.	Category	Sales (MU) or Million kVAh	Contract Demand (kVA)	Demand Charges (Rs/ kVA/ month)	Energy Charges (Rs/ kWh) or (Rs/ kVAh)	Revenue from Fixed/ Demand Charges (Rs. Crore)	Revenue from Energy Charges (Rs. Crore)	Total Revenue (Rs. Crore)	Average Billing Rate (Rs/kWh)
A	LT Category								
1									
2									
…									
B	11 kV								
…									
…									
C	33 kV								
1									
2									
	Total								

Reply:

The Petitioner has computed total revenue from sale of electricity Rs. 755.30 Cr. considering approved rate of Rs. 5.44/kWh as per APTEL interim Order issued on 17.03.2023 as there was no final order from Hon'ble Commission at that time.

Hon'ble Commission passed the Tariff order for FY 2023-24 for JSPL Distribution business on 10th January2024. Based on the tariff applicability, the computation of revenue as following:

Sl.	Category	Sales (MU) or Million kVAh	Contract Demand (kVA)	Demand Charges (Rs/ kVA/ month) or (Rs/kW/month)	Energy Charges (Rs/ kWh) or (Rs/ kVAh)	Revenue from Fixed/ Demand Charges (Rs. Crore)	Revenue from Energy Charges (Rs. Crore)	Total Revenue (Rs. Crore)	Average Billing Rate (Rs/kWh)
A	**LT Category**								
1	Non Domestic	0.52	115	25	5	0.00	0.26	0.26	5.06
2	Deamnd based	0.17	87	50	5.5	0.00	0.09	0.10	5.78
B	**11 kV**								

For, Jindal Steel & Power Limited

Authorised Signatory

Sl.	Category	Sales (MU) or Million kVAh	Contract Demand (kVA)	Demand Charges (Rs/ kVA/ month) or (Rs/kW/month)	Energy Charges (Rs/ kWh) or (Rs/ kVAh)	Revenue from Fixed/ Demand Charges (Rs. Crore)	Revenue from Energy Charges (Rs. Crore)	Total Revenue (Rs. Crore)	Average Billing Rate (Rs/kWh)
1	Steel Industries	39.56	6200	251	5.09	1.87	20.13	22.00	5.56
2	Other General Purpose	1.84	1000	251	5.09	0.30	0.94	1.24	6.72
C	33 kV								
1	Steel industries	1330.48	301200	251	5.09	90.72	677.21	767.94	5.77
2	Other industries	15.86	3000	251	5.09	0.90	8.07	8.97	5.66
	Total	**1388.43**	**311602**			**93.80**	**706.71**	**800.51**	**5.77**

23. **JSPL-D should submit the proposed category-wise tariffs for FY 2024-25 in the following Format:**

Sl.	Category	Proposed Fixed/Demand Charges (Rs/ kVA/ month)	Proposed Energy Charges (Rs/ kWh) or (Rs/ kVAh)
A	LT Category		
1			
2			
…			
B	11 kV		
…			
…			
C	33 kV		
1			
2			
	Total		

Reply:

The Petitioner hereby submits the proposed category-wise tariff for FY 2024-25 as following:

Sl.	Category	Demand Charges (Rs/ kVA/ month) or (Rs/kW/month)	Energy Charges (Rs/ kWh) or (Rs/ kVAh)
A	LT Category		
1	Non Domestic	25	5
2	Demand based	50	5.5

For, Jindal Steel & Power Limited

Authorised Signatory

Sl.	Category	Demand Charges (Rs/ kVA/ month) or (Rs/kW/month)	Energy Charges (Rs/ kWh) or (Rs/ kVAh)
B	11 kV		
1	Steel Industries	251	5.18
2	Other General Purpose	251	5.18
C	33 kV		
1	Steel industries	251	5.18
2	Other industries	251	5.18

24. JSPL-D should submit Annexure-VI related to the data on kWh and kVAh consumption for the HT category and the actual Power Factor as mentioned in the Para 186 of the Petition.

Reply:

The Petitioner hereby submits the kWH & kVAH consumption for HT category and the actual power factor as an **Annexure-7 (B-24)**

C. Revised Estimates for FY 2023-24

25. JSPL-D should clarify under which provision of the MYT Regulations, 2021 is the revised estimate for FY 2023-24 submitted.

Reply:

It is submitted that the Regulation 5.7 (b) (ii) of the Chhattisgarh State Electricity Regulatory Commission (Terms and Conditions for determination of tariff according to Multi-Year Tariff principles and Methodology and Procedure for determination of Expected revenue from Tariff and Charges) Regulations, 2021 provides that following should be covered in the yearly Petition.

a. The truing up petition for preceding year(s).
b. Revised power purchase quantum/cost (if any), with details thereof for the ensuing year.
c. Revenue from existing tariffs and charges and projected revenue for the ensuing year.
d. Application for re-determination of ARR for the ensuing year along-with retail tariff proposal.

For, Jindal Steel & Power Limited
Authorised Signatory

In view of the above the Petitioner has filed the True-Up Petition for FY 22-23. For projecting the ARR and revenue gap for the ensuing year i.e. FY 24-25 the ARR for FY 23-24 has been calculated and submitted before the Hon'ble Commission for approval.

D. Surplus Power of Raigarh CPP

In para 44, 48 and 56 of order dated 17.03.2023 passed in appeal no. 438 to 444 of 2022, Hon'ble APTEL's has directed the Commission to determine the surplus capacity of RCPP with its pattern considering 15 minutes time block data. Therefore, for truing-up of FY 2022-23, the Commission has to determine surplus capacity of RCPP with its pattern considering 15 minutes time block data. In view of this, JSPL-D is required to provide following information:

1. JSPL-D should submit the daily data in 15-minute time block of Unit-wise generation (in MW and MU) along with auxiliary energy consumption (in MU) from Raigarh CPP from April 1, 2022 to March 31, 2023 in MS Excel.

Reply: Monthly Unit-wise generation (in MW and MU) along with auxiliary energy consumption (in MU) from Raigarh CPP from April 1, 2022 to March 31, 2023 in MS Excel is attached as **Annexure-8 (D-1, D-2) and MS Excel Sheet is shared with email id:** zulfeqar.ali@jindalsteel.com

2. JSPL-D should submit the captive consumption data (in MW and MU) in 15-minute time block from Raigarh CPP from April 1, 2022 to March 31, 2023 in MS Excel.

Reply: Please refer **Annexure-8 (D-1, D-2).**

3. JSPL-D should submit the 15-minute time block data of power sold (in MW and MU) to different entities from Raigarh CPP from April 1, 2022 to March 31, 2023 in MS Excel.

Reply: 15-minute time block data of power sold/supplied (in MW and MU) to different entities from Raigarh CPP from April 1, 2022 to March 31, 2023 in MS Excel in MS Excel as **Annexure-9(D-3) and MS Excel Sheet is shared with email id:** zulfeqar.ali@jindalsteel.com

For, Jindal Steel & Power Limited
Authorised Signatory

4. JSPL-D should submit 15-minute time block data of power supplied (in MW and MU at drawl point) to the JSPL's licensed distribution system from April 1, 2022 to March 31, 2023 in MS Excel.

Reply: 60-minute time block data power supplied (in MW and MU at drawl point) to the JSPL's licensed distribution system from April 1, 2022 to March 31, 2023 in MS Excel. as **Annexure-10(D-4) and MS Excel Sheet is shared with email id:** zulfeqar.ali@jindalsteel.com

5. JSPL-D should submit the copy of Form-G for Raigarh CPP submitted to Chief Electrical Inspector along with all Annexures, for the period from April 2022 to March 2023 (Monthly and consolidated for Financial Year)

Reply: Copy of Form-G for Raigarh CPP submitted to Chief Electrical Inspector along with all Annexures, for the period from April 2022 to March 2023 (Monthly and consolidated for Financial Year). as **Monthly data-Annexure-11.1 to 11.12 (D5- G form) & Annexure-12 consolidated FY data--(D-5, D-6)., MS Excel Sheet is shared with email id:** zulfeqar.ali@jindalsteel.com

6. For FY2022-23, JSPL-D should submit the annual Energy Balance in respect of Raigarh CPP with the following details:
   a. Energy generated
   b. Captive consumption
   c. Energy supplied to licence area of JSPL-D (Industrial Park)
   d. Energy sold to CSPDCL
   e. Energy sold to any other entities

Reply: Energy Balance in respect of Raigarh CPP, please refer to **Annexure-12 -consolidated FY data-(D-5, D-6).**

For, Jindal Steel & Power Limited

Authorised Signatory

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: 19/02/2024

Yours Faithfully,

For, Jindal Steel & Power Limited

Authorised Signatory

Authorized Signatory