

**BEFORE THE HON'BLE CHHATTISGARH STATE ELECTRICITY
REGULATORY COMMISSION, RAIPUR**

In the matter of-

PETITIONER

Chhattisgarh State Power Distribution
Co. Ltd.,

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COUNSEL FOR CSPDCL

16.06.2025

RAIPUR



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BEFORE THE CHHATTISGARH STATE ELECTRICITY
REGULATORY COMMISSION, RAIPUR

In the matter of-

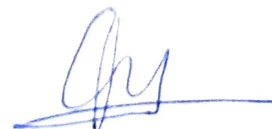
PETITIONER

Chhattisgarh State Power Distribution
Co. Ltd.,

APPLICATION FOR AMENDMENT OF REVIEW
PETITION BEARING NO. 75 OF 2024

Most respectfully showeth:-

1. That a review petition bearing petition no. 75 of 2024 was filed by the Applicant/Petitioner herein seeking review of the tariff order dated 01.06.2024 passed in Petition No. 09 of 2024.
2. That it is humbly submitted that the certain computation and other minor errors which occurred in the order dated 01.06.2024 due to the bonafide mistake of the parties were mentioned in the review petition.
3. It is further submitted that submissions with respect to incorrect computation of VCA adjustment for July, 2022 were not included in the review petition and therefore, the instant application is being filed seeking permission to amend the pleadings of the review petition so as to incorporate submissions with respect to the same.



4. It is humbly requested that after para 7.15 of the application, following new paragraphs may be added-

"7.16. It is further humbly submitted that the Applicant (CSPDCL) had inadvertently recovered an extra amount of Rs. 43.15 Cr towards VCA pertaining to month of July, 2022. As per tariff order this amount was not to be recovered through VCA mechanism.

7.17 This amount of Rs. 43.15 Cr is included in the revenue from sale of power i.e. Rs. 19,541.35 crore as mentioned in the Table 8-25 [Approved Revenue Gap/ (Surplus) for FY 2022-23 (Rs. Crore)] of the impugned order dated 01.06.2024.

7.18 That due to inclusion of the Rs. 43.15 Cr in the revenue from sale of power, the Standalone Revenue Gap for the FY 2022-23 is also reduced by similar amount, otherwise the Standalone Revenue Gap would have been $\text{Rs. } 877.23 + 43.15 = 920.38 \text{ Cr}$

7.19 That it is humbly submitted that even though the amount of Rs. 43.15 Cr was recovered additionally by the Applicant, the amount had been adjusted again. (Ref: Row 11 of table 8-25 of the tariff order. The amount mentioned includes carrying cost because of which the revenue gap for the FY 2022-23 was further reduced by 43.15 Cr, this led to ultimately reduced ARR for the subsequent year by an amount of $\text{Rs. } 43.15 \times 7.5\% / 2 + 43.15 = 44.76 \text{ Cr} + 44.76 \times 9.16\% = 48.86 \text{ Cr}$ (this difference of



Rs. 48.86 crore pertains only to the recovery of VCA and does not include the overall change in ARR due to sought review of carrying cost from 7.50 to 9.16%).

- 7.20 That it is however submitted that the Applicant herein due to Bonafide error, in order to adjust the amount of Rs. 43.15 had further reduced the same from the standalone gap. This resulted in additional deduction of Rs. 45.72 Cr (including carrying cost) in the impugned tariff order. The Row 11 in the Table 8-25 [Approved Revenue Gap/ (Surplus) for FY 2022-23 (Rs. Crore)] [Principle amount of Rs. 43.15+ carrying cost of Rs. 2.57 Cr] actually resulted in double reduction resulting in loss of revenue to the tune of Rs. 43.15 Cr to the Applicant.
- 7.21 It is thus humbly submitted that the total closing revenue gap for the FY 2022-23 as mentioned in the table 8-25 of the impugned order stands increased to Rs. $3427.84+43.15=3470.99+7.5\%/2*3470.99=3601.15$ Cr.
- 7.22 That a detailed comparison of Table- 8.25 after revising the incorrect additional adjustment of VCA is annexed herein as **ANNEXURE P/4**
- 7.23 That it is further submitted that since an amount of Rs. 43.15 Cr is adjusted twice, the total amount of Gap carried forward from Final True up of FY 2022-23 for CSPDCL as mentioned in Table 10-2 of the impugned order would be Rs. 98.07 Cr . This



is including the difference in gap due to additional claim towards carrying cost @9.16% on the VCA amount.

Thus, the total difference amount of the gap would be Rs.98.07 Cr which includes gap due to claim of carrying cost @9.16% instead of 7.50% on the VCA amount and claim towards incorrect adjustment of VCA charges.

7.24 Thus, a differential amount of Rs. 48.86 is recoverable by CSPDCL towards incorrect adjustment of VCA and Rs. 49.21 Cr. is recoverable towards claims arising due to consideration of carrying cost as 7.50% against actual carrying cost of 9.16% and computation of IOWC without including additional revenue of Rs. 595.18 Cr and therefore, it is requested that the instant amendment in review petition maybe allowed to further consider recovery for following amount of 98.07 Cr in the FY 2024-25. “

Sr no	Reasons for claim	Amount Rs in Crore	Remark
01	Claiming arising due to consideration of carrying cost for FY 2023-24 as 7.5% instead of 9.16% and computation of IOWC without including additional revenue of Rs. 595.18 Cr due to Agriculture	49.21	Covered in the review petition filed
02	Claim arising out of wrong	48.86	Covered under amendment



	computation of VCA		
	Total	98.07	

5. That it is further submitted that the para 7.16, 7.17 and 7.18 of the review petition/application maybe renumbered as 7.25, 7.26 and 7.27 due to addition of new paragraphs.
6. That it is further submitted that following new grounds maybe added after para 8.9 of the review application-

"8.10 For the reason that allowing double deduction of VCA charges would result in under recovery of cost of supply and will overburden the Applicant.

8.11 For the reason that the VCA charges were deducted twice due to Bonafide error and the erroneous calculations were taken into account by the Hon'ble Commission while passing the impugned order.

8.12 For the reason that allowing recovery of the actual cost incurred by Applicant will not prejudice rights of any of the consumers of the Applicant and will be in line with the provisions of the Electricity Act."

7. That it is further submitted that the relief clause of the original review application maybe amended by adding new reliefs after relief (iv) as -



"v. Kindly allow the recovery of Rs. 48.86 Cr (Rs. 43.15 Cr VCA along with carrying cost @9.16%) towards incorrect adjustment of VCA in the FY 2024-25;

vi. Kindly allow the adjusted ARR for recovery for the FY 2024-25 as Rs. 23691.94 as against the current amount of Rs. 23,593.87 as provided in the impugned order."

8. That it is humbly submitted that due to addition of new reliefs after relief (iv), the original relief (v) maybe renumbered as relief (vii).
9. That it is humbly submitted that original review application is under consideration of the Hon'ble Commission and therefore amending of the review application will not cause any prejudice to any party.

PRAYER

10. That in view of the above, it is humbly prayed before the Hon'ble Commission -

- i) To allow the instant application;
- ii) To allow the applicant herein to carryout the amendments in original review petition no. 75 of 2024 as specified in para 4, 5, 6, 7 and 8 of the instant application;
- iii) To pass any other order as the Hon'ble Court may deem fit in the interest of justice.

16.06.2025

RAIPUR



ABHINAV KARDEKAR

COUNSEL FOR CSPDCL



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**BEFORE THE HON'BLE CHHATTISGARH STATE
ELECTRICITY REGULATORY COMMISSION, AT
RAIPUR**

Petition No. _____

the matter of:

PETITIONER:

Chhattisgarh State Power Distribution
Company Limited

AFFIDAVIT

I, R. Sadasivan, S/o. Late. Shri. R.S. Pillai, aged about 56 years working as Superintending Engineer, o/o. E.D. (RA& PM), CSPDCL having office address Vidyut Sewa Bhavan, 4th floor, Daganiya, Raipur (C.G.) – 492013 has solemn affirmation on oath as under:

1. That, I am the authorized signatory of Petitioner/Applicant in the instant matter. The statement made in all the paragraphs of this application are based on the information available in the office record maintained during course of business and I believe them to be true. The legal averment made are believed to be true as per legal advice received.
2. That nothing material is overstated or concealed in the accompanying application.




DEPONENT
Superintending Engineer
O/o. The Executive Director (RA& P.M.)
C.S.P.D.C.L Raipur



VERIFICATION

I, R. Sadasivan, the above described deponent, solemnly affirm and verify that the contents of this affidavit are true to my personal knowledge and belief.

Hence verified and signed on 16.06.25 at Raipur (C.G.).

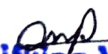


Raipur
(C.G.)


DEPONENT
Superintending Engineer
O/o. The Executive Director (R.A. & P.M.)
C.S.P.D.C.L. Raipur

SOLEMNLY AFFIRMED OR
SWORN BEFORE ME BY
THE WITHIN NAMED.


I. C. TIWARY,
NOTARY,
RAIPUR. (C.G.)


Identifying Witness
Om Prakash Sahu, Raipur.

16 JUN 2025

Table 8-25: Approved Revenue Gap/(Surplus) for FY 2022-23 (Rs. Crore)					
Sl. No.	Particulars	Tariff Order	Petition	True-up	True-up
1	Net ARR	18,676.92	20,734.59	20,418.59	20,418.59
2	Revenue from Sale of Power		18,946.17	19,541.35	19,541.35
3	Standalone Revenue Gap/(Surplus)		1,788.42	877.23	877.23
4	Add: Revenue Gap/(Surplus) carried forward from final true-up of FY 2020-21 for CSPGCL	246.21	246.21	246.21	246.21
5	Add: Revenue Gap/(Surplus) carried forward from final true-up of FY 2020-21 for CSPTCL	-90.32	-90.32	-90.32	-90.32
6	Add: Revenue Gap/(Surplus) carried forward from final true-up of FY 2020-21 for CSLDC	-3.32	-3.32	-3.32	-3.32
7	Add: Revenue Gap/(Surplus) carried forward from final true-up of FY 2020-21 for CSPDCL	1,679.82	1,679.82	1,679.82	1,679.82
8	Add: Revenue Gap/(Surplus) after true-up of FY 2022-23 for CSPGCL		159.76	-	-
9	Add: Revenue Gap/(Surplus) after true-up of FY 2022-23 for CSPTCL		37.02	-	-
10	Add: Revenue Gap for Review Petition after Final True Up for FY 2021-22		939.47	763.93	763.93
11	Less: VCA Adjustment Carrying Cost		-45.72	-45.72	-2.57
9	Closing Revenue Gap/(Surplus)		4,711.33	3,427.84	3,470.98
10	Rate of Interest (%)		7.50%	7.50%	7.50%
11	Carrying/(Holding) cost		137.59	128.54	130.162
12	Total Closing Revenue Gap/(Surplus) at end of the year		4,848.92	3,556.38	3,601.14
			Difference		44.76
			Carrying cost for FY 2023-24		4.10
			Actual gap due to impact of VCA		48.86