BEFORE THE MAHARASHTRA ELECTRICITY REGULATORY COMMISSION, MUMBAI

CASE NO. 187 OF 2024

IN THE MATTER OF;

Replies towards **Data Gap raised by the Hon'ble Commission vide email dated 11.11.2024** in Case No. 187 of 2024 filed by Maharashtra State Power Generation Company Ltd for "approval of (i) Final True-up for FY 2022-23 and FY 2023-24, (ii) Provisional True-up for FY 2024-25, and (iii) Approval of Aggregate Revenue Requirement (ARR) and Tariff for the Control Period FY 2025-26 to FY 2029-30".

I. General

1. MSPGCL has not submitted the duly filled in Accounting Statement formats specified in the MYT Regulations, 2019. MSPGCL to submit the same for FY 2022-23, FY 2023-24 and FY 2024-25.

MSPGCL's Reply:

The Accounting Statement in formats specified in the MYT Regulations, 2019 for FY 2022-23 and FY 2023-24 is attached as Annexure DG-I-1 to these replies of data gap set I.

2. MSPGCL to submit the CAG Audit Reports for FY 2022-23 and FY 2023-24.

MSPGCL's Reply:

The copy of CAG Audit Reports for FY 2022-23 is attached as Annexure DG-I-2 to these replies of data gap set I. CAG report for FY 2023-24 is awaited. Upon receipt, the same will be forwarded for the consideration of the Hon'ble Commission.

3. MSPGCL in Para 4.6.2 of the Petition has mentioned the key findings of the Committee Report by the Committee formulated by CEA regarding O&M Expenses of Koradi Units 8-10. MSPGCL to submit the complete copy of the Committee Report in this regard.

MSPGCL's Reply:

The copy of the complete Committee Report by the Committee formulated by CEA regarding O&M Expenses of Koradi Units 8-10 is enclosed as Annexure DG-I-3 with the replies of data gap set I.

4. MSPGCL in Para 5.1.1.1 in response to compliance to the Commission's directive regarding Grade Slippage has mentioned the various steps taken by it, but the

outcome of various steps in terms of improvement achieved have not been elaborated. MSPGCL to elaborate the outcome of various steps taken regarding Grade Slippage.

<u>MSPGCL's Reply</u>:

To minimize grade slippage and improve coal quality, the Petitioner has implemented the following measures:

1. The difference in GCV of loading end and Unloading end is attributed to various issues of sampling methodologies viz., topping up of good quality coal in wagons while loading of wagons, only 10 % sampling as per FSA from wagons in a rake against 25% sampling as per IS – 436, manual mode of sampling from wagons, which collects sample only top portion of coal respectively. Issues in Road mode coal supply wherein randomness is followed only for first lot of 8 trucks, then after sample is collected from same number interval for that day. Same is the case with conveyor Belt sampling. Randomness is maintained in first lot of 45 minutes, then after sample collected at same time interval, which is lacking the randomness. To overcome from these issues, MSPGCL has suggested
    a) to carry out sampling by deploying Auger machine instead of manual sampling,
    b) collection of sample from 25 % wagons as per BIS to collect the maximum samples to represent the total population,
    c) Collection of road mode sample randomly from each lot of 8 trucks, Collection of belt sample randomly at any time from lot of 45 minutes every time.

Regarding review of sampling methodology, MSPGCL has taken up the matter with Ministry of Coal, Hon. Secretary Coal and Secretary CIL etc through various meetings / forums at Delhi. Also written letter to Hon Minister of Coal, Govt of India from Hon Deputy Chief Minister, Maharashtra, Secretary Coal, Ministry of Coal from Hon Chairman & Managing Director, MSPGCL for review of sampling methodology of coal. The copies of various letters are attached as Annexure DG-I-4.

In addition to above MSPGCL have adopted various measures for monitoring of coal supplied to MSPGCL at Loading End as mentioned below.

For collection of coal samples at loading end third party sampling agency M/s CSIR - Central Institute of Mining and Fuel Research was deployed jointly by Coal India and MSPGCL from 2016 but the difference in GCV of Loading End and Un-Loading End was above the margin allowed by the Hon'ble Commission. Then, from November 2023 CSIR-CIMFR stopped their work and the sampling analysis work is now allotted to Power Finance Corporation empaneled Third Party sampling agency.

As a result of such efforts, improvement in minimizing the grade results deviations at loading end is observed, whereas the improvement in grade slippage is not much evident. As such, the difference in GCV of Loading End and Un-Loading End is still higher than the gap allowed by the Hon'ble Commission.

Though the GCV gap is higher than the allowed margin, the average GCV gap for raw coal for FY 2022-23 was ~897 kcal/kg, which was reduced to ~839 kcal/kg in FY 2023-24 on account of the various measures elaborated above.

5. MSPGCL in Table 14 of the Petition has submitted the Gross Generation from Uran in Combined Cycle and Open Cycle for FY 2022-23 and FY 2023-24. MSPGCL to submit the similar details for the first half of FY 2024-25 in Table 14.

MSPGCL's Reply:

Gross generation from Uran in Combined Cycle and Open Cycle for the first half of FY 2024-25 is incorporated in the revised Petition under table 14 which is being submitted along with these replies of data gaps. The updated table 14 is provided below for ready reference of the Hon'ble Commission.

Year	Unit	Open cycle	Combined cycle	Total
FY 2022-23	Mus	322.30	1,168.91	1,491.22
	% of total	21.61%	78.39%	100.00%
FY 2023-24	Mus	66.51	1,702.52	1,769.03
	% of total	3.76%	96.24%	100.00%
FY 2024-25 (H1)	Mus	74.59	1,186.36	1260.95
	% of total	5.92%	94.08%	100.00%

6. Regarding Co-firing of Biomass Pellets, MSPGCL for Khaperkheda TPS submitted that the tender has been finalized and a LoA was issued to M/s Avaneesh Chemicals. MSPGCL to submit the following in this regard:
    a. Copy of Bid Evaluation Report
    b. Copy of LoA
    c. Impact on Year wise Fuel Expenses based on this LoA.

MSPGCL's Reply:

The copy of bid evaluation report and LoA along with impact on year wise Fuel Expenses based on this LoA is attached as **Annexure DG-I-6.**

It is submitted that operational parameters considered in calculation of impact of biomass pellet is based on normative parameters as specified in the MYT Regulations for Khaperkheda unit 5. Assumption of GCV of biomass pellet of 4500 kcal/kg is considered as per guaranteed GCV to be supplied by the supplier as per tender conditions.

Further, the rate of biomass pellet is considered Rs.14962.5/MT. It is worked out including 5% GST on Rs.14250/MT. The said LoA is for Order value of Rs.1738,50,000/- for yearly quantum of 12,200 MT/year of Biomass pellet.

7. MSPGCL to submit the MS-Excel computations of the Annexure 11 on Detailed working of the impact of LD and UDL in case of Koradi units 8-10 with appropriate formulae and linkages.

MSPGCL's Reply:

It is submitted that due to inadvertent formulation error in computation of average loan (in calculation of interest on loan), the revised computation of impact of LD and UDL in case of Koradi units 8-10 with appropriate formulae and linkages is attached as Annexure DG-I-7 to these replies of data gap set I. In view of this, it is submitted that the relevant table, i.e. Table 24 in the Petition shall be updated in revised Petition. Further, it is submitted that data gap 7, 10 and 11 are pertains to UDL/LD of Koradi Unit 8-10. Hence, incorporating replies of these data gaps, the revised working of 'ARR to be allowed on account of LD finalization of Koradi Unit 8-10 from FY 16-17 to FY 21-22' is attached as Annexure DG-I-11. However, for ease of reference, the revised table 24 of the Petition is provided below:

Particulars	FY 16-17	FY 17-18	FY 18-19	FY 19-20	FY 20-21	FY 21-22
Depreciation	0.72	7.09	7.09	7.11	7.09	7.09
Interest on Loan	2.20	9.47	8.09	7.47	7.18	6.11
Return on Equity	0.31	3.02	6.24	6.26	5.64	5.64
IoWC	0.06	0.34	0.34	0.34	0.29	0.27
Additional ARR to be allowed	**3.28**	**19.91**	**21.77**	**21.18**	**20.20**	**19.11**
Normative Availability	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%
Actual Availability	58.63%	53.98%	46.67%	53.76%	65.78%	63.00%
Amount to be recovered	**2.26**	**12.65**	**11.95**	**13.39**	**15.63**	**14.16**

8. MSPGCL submitted that the installed capacity of small hydro plants as 173 MW in the Table 9 of the Petition. In this regard, MSPGCL to submit the details of small hydro stations in the below specified format:

Table 1: Format for submission of SHP details

Sl. No.	Name of the SHP	Location	Unit size (MW)	No. of Units	Installed capacity (MW)

MSPGCL's Reply:

Following are the details of Small Hydro stations as sought in the above data gap.

Details of SHP Projects

Sl. No.	Name of the SHP/Location	Unit size (MW)	No. of Units	Installed capacity (MW)
1.	Vaitarna DT	1.5	1	1.5
2.	Bhatsa	15	1	15
3.	Surya	6	1	6
4.	Terwanmendhe	0.2	1	0.2
5.	Radhanagri	1.2	4	4.8
6.	Dudhganga	12	2	24
7.	Yeldari	7.5	3	22.5
8.	Paithan	12	1	12
9.	Manikdoh	6	1	6
10.	Dimbhe	5	1	5
11.	Varasgaon	8	1	8
12.	Pawna	10	1	10
13.	Panshet	8	1	8
14.	Kanher	4	1	4
15.	Dhom	1	2	2
16.	Ujani	12	1	12
17.	Warna	8	2	16
18.	Bhatghar	16	1	16
19.	**Total**			**173**

9. MSPGCL, in Form 1 of the Formats submitted along with the Petition, claimed depreciation and interest on loan of HO assets. MSPGCL to submit the detailed calculation of such depreciation and interest in loan in MS Excel with appropriate formulae and linkages along with reconciliation with the values as per the Audited Accounts for FY 2022-23 and FY 2023-24.

MSPGCL's Reply:

MSPGCL submits that the detailed calculations in MS Excel with appropriate formulae and linkages of depreciation and interest on loan of HO Assets for FY 2022-23 and FY 2023-24 are attached in Annexure DG-I-9 to these replies of data gap set I.

10. MPSGCL in para 6.1.1.10 has claimed UDL discharged during FY 2022-23 to the extent of Rs 121.44 Crore for Koradi Unit 8-10 and claimed the additional capitalization which is beyond the cut-off date. In this regard, MSPGCL to submit the following:
    a. Reasons for discharging these liabilities post cut-off-date with supporting documents
    b. Details of Party wise liability discharged certified by Statutory Auditor along

with reconciliation with Audited accounts

<u>MSPGCL's Reply</u>:

It is submitted that the amount submitted of UDL discharged during FY 2022-23 is comprising of Rs.19.51 Crore as UDL discharged and Rs.101.93 Crore as LD levied. Accordingly, the revised capital cost of Koradi Unit 8-10 would be Rs.121.44 Crore as on date of commissioning. Hence, the incremental capital cost as on CoD to be allowed worked out below:

Particulars	Approved in Case No. 59 of 2017	Claimed in Case No. 227 of 2022	Approved in Case No. 227 of 2022	Claimed in Present MYT Petition
Capital cost including IDC (as on COD) (A)	**12,243.36**	**12,243.36**	**12,243.36**	**12,243.36**
<u>LD amount</u>				
BTG package	824.99	102.50	102.50	101.93
BOP package	268.53		267.86	-
Total LD Amount (B)	1,093.52	102.50	370.36	101.93
50% of LD (C=B*50%)	546.76	51.25	185.18	50.97
Net capital cost (A-C)	11,696.60	12,192.11	12,058.18	12,192.40
Incremental capital cost as on COD		**495.26**	**361.33**	**134.22**

In view of above, revised working of ARR to be allowed on account of LD finalization of Koradi Unit 8-10 from FY 16-17 to FY 21-22 (shown at table 24 of the Petition) is as under:

Particulars	FY 16-17	FY 17-18	FY 18-19	FY 19-20	FY 20-21	FY 21-22
Depreciation	0.72	7.09	7.09	7.11	7.09	7.09
Interest on Loan	2.20	9.47	8.09	7.47	7.18	6.11
Return on Equity	0.31	3.02	6.24	6.26	5.64	5.64
IoWC	0.06	0.34	0.34	0.34	0.29	0.27
Additional ARR to be allowed	**3.28**	**19.91**	**21.77**	**21.18**	**20.20**	**19.11**
Normative Availability	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%
Actual Availability	58.63%	53.98%	46.67%	53.76%	65.78%	63.00%
Amount to be recovered	**2.26**	**12.65**	**11.95**	**13.39**	**15.63**	**14.16**

Further, revised amount of UDL discharged during FY 2022-23 is Rs.19.51 Crore as against Rs.121.44 Crore submitted in the Petition in Table 23 of the Petition. Accordingly, additional capitalisation considered for FY 2022-23 is revised and the same shall be submitted through revised tariff format subsequently along with revised Petition. The excel working of the ARR to be allowed on account of LD finalization of Koradi Unit 8-10 from FY 16-17 to FY 21-22 is attached as Annexure DG-I-11.

Further, it is submitted that Reasons for discharging these liabilities post cut-off-date with supporting documents are listed below:

a) Liabilities outstanding are discharged after carrying out due diligence as per contract agreement. Generally following steps are generally involved:
   i. Reconciliation of material and financial data
   ii. Delay analysis and finalization

iii. Ensuring taxes and statutory compliances of civil contract like royalty payment to Govt., contractual payments to labours etc,

iv. Contract defect liabilities and its redressal

b) In Case No. 227 of 2022, MSPGCL had requested the Hon'ble Commission for an extension of the cut-off date to March 31, 2024. While the Hon'ble Commission, in its order for the said case, did not explicitly grant the extension, it indicated that it would consider the matter based on submissions made in the true-up petitions for the respective years on a case-by-case basis.

c) MSPGCL submits that the delay in discharging the undischarged liability (UDL) is primarily due to challenges in executing pending additional capitalisation works, caused by the bankruptcy of BoP vendors and subsequent COVID-related disruptions. Additionally, delays in finalizing the Final Time Limit Extension (FTLE) for various contracts, including BTG and BoP, have further contributed to the delay in discharging UDL related to various retentions.

d) MSPGCL has made all-out efforts to complete the pending works and finalize the FTLE by March 2025. In view of the above, MSPGCL respectfully requests the Hon'ble Commission to approve an extension of the cut-off date to March 31, 2025, and to permit MSPGCL to approach the Commission after the discharge of liability. For schemes that are delayed beyond FY 2024-25 or UDL discharges delayed beyond FY 2024-25, MSPGCL seeks permission to submit the relevant details in the true-up petition for the respective year.

The aforementioned process takes considerable times. Hence, it leads to delay in discharge of liabilities. The documentary evidence with respect to payment of Rs.19.51 Crore is attached as Annexure DG-I-10 to these replies of data gap set I.

11. MSPGCL, in Table 24 of the Petitioner, submitted the ARR to be allowed on account of LD finalization for Koradi Units 8-10 during the period from FY 2016-17 to FY 2021-22. MSPGCL to submit the computations of the same in MS Excel with appropriate formulaes and linkages.

<u>MSPGCL's Reply</u>:

MSPGCL submits that the detailed MS-Excel computations with appropriate formulae and linkages for the ARR to be allowed on account of LD finalization for Koradi units 8-10 during the period FY 2016-17 to FY 2021-22 are attached in Annexure DG-I-11 to these replies of data gap set I. The Petitioner submits that the said details are being incorporated in the revised Petition.

12. MSPGCL in Para 6.1.2.2 of the Petition submitted that LD Amount of Rs 250.29 Crore has been levied on BHEL for Bhusawal Units 4 and 5, while in the last line it is mentioned that the actual LD stands at Rs 250.54 Crore. Petitioner to confirm the

actual LD amount and accordingly revise its computations.

MSPGCL's Reply:

It is submitted that the final LD amount levied on M/s BHEL for Bhusawal units 4 and 5 is Rs.250.25 Crore. Contract Closing Note for levy of LD amount Rs. 250.25 Crs. on M/s BHEL is attached under Annexure DG-I-12.

Hence, considering the impact of 50% of finalised LD amount of Rs.250.25 Crore, i.e., Rs.125.12 Crore as against earlier amount of Rs.125.27 Crore and the additional expenses to be capitalized of Rs.24.05 Crore as detailed in para 6.1.2 of the present Petition, the working of additional capitalisation to be allowed against finalization of LD and additional expense of Rs.23.90 Crore would be as under:

Particulars	Revised Cost of the project as per actual/recoverable LD (Approved in Case No. 227 of 2022)	Revised Cost of the project as per actual/recoverable LD
	Rs. crore	Rs. crore
Hard Cost	5,099.92	5,099.92
IDC	1,327.63	1,327.63
Less: 50% of the estimated Liquidated Damages	125.27	125.12
Capital Cost	6,302.29	6,302.43
Plus Additional Capital cost burden considering the Arbitration award & cost of arbitration		23.90
Total capital cost	6,302.29	6,326.34
Differential Additional capital cost claim in this petition		**24.05**

In view of above changes, the revised computation of ARR to be allowed on account of additional expenses in regard to LD finalization of Bhusawal Unit 4-5 from FY 13-14 to FY 21-22 (Table 25 of the Petition) is as shown below. Further detailed calculation of the same is attached as Annexure DG-I-12 to these replies of data gap set I.

Revised Table 25 of the Petition

Table 25: ARR to be allowed on account of additional expenses in regard to LD finalization of Bhusawal Unit 4-5 from FY 13-14 to FY 21-22

Particulars	FY 13-14	FY 14-15	FY 15-16	FY 16-17	FY 17-18	FY 18-19	FY 19-20	FY 20-21	FY 21-22
Depreciation	0.31	1.27	1.27	1.27	1.27	1.27	1.27	1.27	1.27
Interest on Loan	0.56	2.23	2.02	1.62	1.49	1.36	1.24	1.11	0.97
Return on Equity	0.18	0.76	0.76	0.37	0.37	0.76	0.76	0.71	0.69
IoWC	0.03	0.11	0.10	0.06	0.05	0.06	0.05	0.04	0.04
Additional ARR to be allowed	**1.08**	**4.36**	**4.15**	**3.32**	**3.18**	**3.45**	**3.32**	**3.14**	**2.97**
Normative Availability	80.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%
Actual Availability	55.37%	82.64%	89.09%	93.49%	80.90%	82.03%	83.72%	92.51%	77.81%
Amount to be recovered	**0.74**	**4.24**	**4.15**	**3.32**	**3.03**	**3.33**	**3.27**	**3.14**	**2.72**

13. MSPGCL, in page 74 of the Petition, submitted the additional expenses capitalization of Rs. 20.76 Crore in FY 2022-23. MSPGCL to submit the justification for the same as to under which provision of the Regulations, these expenses have been claimed.

<u>MSPGCL's Reply</u>:

The Petitioner has claimed additional capitalisation of Rs.20.76 Crore on account of additional expenditure incurred by the Petitioner due to arbitration submitted by Balance of Pant (BoP) contractor, Tata Projects Limited (TPL) in original Petition. In Para 6.1.2.3 of the petitioner, the details of the expense incurred and its relevant supporting are provided. The petitioner submits that the said claim is submitted as per the Regulation 25.1 of MERC (MYT) Regulations 2019. The relevant excerpts of the Regulation is provided below:

> *"**25 Additional Capitalisation***
> *25.1 The capital expenditure, actually incurred or projected to be incurred, on the following counts within the original scope of work, after the date of commercial operation and up to the cut-off date, may be admitted by the Commission subject to prudence check:*
> *(i) Undischarged liabilities recognized to be payable at a future date;*
> *(ii) Works deferred for execution;*
> *(iii) Procurement of initial capital spares within the original scope of work, in accordance with the provisions of Regulation 24;*
> ***(iv) Liabilities to meet award of arbitration or for compliance of directions*** *or order of any statutory authority or order or decree of any court of law; and*
> *(v) Change in law or compliance of any existing law; and*
> *(vi) Force majeure events:*
>
> *Provided that the details of works included in the original scope of work along with estimates of expenditure, liabilities recognized to be payable at a future date and the works deferred for execution shall be submitted along with the Petition for determination of final Tariff after the date of commercial operation of the Generating Unit/Station or transmission system."* ***"Emphasis added"***

However, considering additional expense of Rs.3.14 Crore towards interest allowed to M/s TPL as per Arbitration Award, the total claim for incremental capital cost is worked out to Rs.23.90 Crore as against the earlier claim of Rs.20.76 Crore submitted in the original petition.

Accordingly, the Petitioner submits that an additional capitalisation of Rs. 23.90 Crore, as detailed in para 6.1.2.3, has been claimed due to the arbitration award in accordance with the aforementioned regulatory provisions. The Petitioner respectfully requests the Hon'ble Commission to approve the additional capitalisation of Rs. 23.90 Crore. The detailed working of claim of Rs.23.90 Crore is provided as under:

Following is the tabulation of pointwise details of aforementioned expenses provided in Arbitration Award;

Point in Arbitration Award	Description	Amount (Rs Crore)
Point No 926	**Prolongation cost**	**4.80**
Point No 929	**Additional Work**	**9.15**
Point No 785	*Retaining Wall*	*1.76*
Point No 786, 792	*Additional RCC encasing*	*0.56*
Point No 793/806	*Increase in Box culvert Size*	*0.34*
Point No 807 / 816	*Increase in depth of CW pump house*	*3.47*
Point 817, , 828	*Ash pipeline*	*1.87*
Point No 829, , 839	*Boiler lift*	*0.17*
Point No 840, , 850	*Boiler illumination work*	*0.97*
Point No 933	**Arbitrartion Expenses-1**	**0.11**
Point No	**BG Charges**	**3.69**
Amount Allowed in Award Total (A)		**17.75**
(B) Add Wrongful Recoery		15.19
(C) Chimney retention Amount		9.92
(D) Total Amount of DD including Interest		42.86
(E) Add interest		3.14
Total		**46.00**

Accordingly, the Petitioner submits that amount of incremental capitalisation as shown below on account of Arbitration Award;

Particulars	Description	Amount (Rs Crore)
Amount Allowed in Award Total (A)		17.75
Point No 933	Pre award expenses already incurrerd Arbitrartion Expenses-2	3.01
(E)	Interest Allowed to TPL	3.14
Claim for Incremental capital cost		**23.90**

14. MSPGCL, in Table 25 of the Petition, submitted the impact of additional capitalization and LD finalization amount of Bhusawal Units 4 & 5. MSPGCL to submit the computations of the same in MS Excel with appropriate formulae and linkages.

MSPGCL's Reply:

MSPGCL submits that the detailed MS-Excel computations with appropriate formulae and linkages for the impact of additional capitalization and LD finalization amount of Bhusawal Units 4 & 5 are attached in Annexure DG-I-12 to these replies of data gap set I.

15. MPSGCL in para 6.1.3 has claimed UDL discharged during FY 2022-23 and FY 2023-24 during FY 2022-23 and FY 2023-24. In this regard, MSPGCL to submit the

following:

a. Reasons for delay in discharging these liabilities with supporting documents
b. Details of Party wise liability discharged certified by Statutory Auditor along with reconciliation with Audited accounts

<u>MSPGCL's Reply</u>:

The reasons and status of discharge of liabilities are attached as Annexure DG-I-10, 15 & 17 to these replies of data gaps.

Further, as submitted above in response of Data Gap - 10 regarding challenges in discharging of liabilities of new units (Koradi Unit 8-10, Chandrapur 8-9 and Parli 8) and efforts taken by the Petitioner in discharging the liabilities, MSPGCL respectfully requests the Hon'ble Commission to approve an extension of the cut-off date to March 31, 2025, and to permit MSPGCL to approach the Commission after the discharge of liability. For schemes that are delayed beyond FY 2024-25 or UDL discharges delayed beyond FY 2024-25, MSPGCL seeks permission to submit the relevant details in the true-up petition for the respective year.

16. MSPGCL, in Table 27 of the Petition, revised the discharge of liabilities for Parli Unit 8 from FY 2016-17 to FY 2021-22. In this regard:
    a. MSPGCL to submit the package wise and party wise details of liabilities discharged during each year certified by Statutory Auditor along with reconciliation with Audited accounts.
    b. MSPGCL to submit the supporting documents to substantiate the discharge of liabilities clearly segregating the same package wise and year wise.

<u>MSPGCL's Reply</u>:

The certificate certifying the package wise and party wise details of discharge of liabilities for Parli Unit 8 from FY 2016-17 to FY 2021-22 is attached as Annexure DG-I-16 to these replies of data gap set I.

17. MSPGCL, in Table 29 of the Petition, submitted the impact of change in discharge of liabilities for Parli Unit 8. MSPGCL to submit the computations of the same in MS Excel with appropriate formulae and linkages.

<u>MSPGCL's Reply</u>:

MSPGCL submits that the detailed MS-Excel computations with appropriate formulae and linkages of change in discharge of liabilities for Parli Unit 8 are attached in Annexure DG-I-17 to these replies of data gap set I.

It is submitted that due to inadvertent formulation error in computation of average loan (in calculation of interest on loan), the revised computation of impact of UDL in case of Parli Unit 8 with appropriate formulae and linkages is attached as Annexure DG-I-17 to these replies of data gap set I. In view of this, it is submitted that the relevant table, i.e., Table 29 in the Petition shall be updated in revised Petition. However, for ease of reference, the revised table 24 of the Petition is provided below:

Particulars	FY 16-17	FY 17-18	FY 18-19	FY 19-20	FY 20-21	FY 21-22
Depreciation	0.01	0.08	0.12	0.11	0.10	0.14
Interest on Loan	0.02	0.11	0.15	0.12	0.11	0.15
Return on Equity	0.01	0.04	0.11	0.09	0.09	0.11
IoWC	0.00	0.00	0.01	0.01	0.00	0.01
Additional ARR to be allowed	**0.04**	**0.23**	**0.39**	**0.32**	**0.30**	**0.41**
Normative Availability	85.00%	85.00%	85.00%	85.00%	85.00%	85.00%
Actual Availability	4.28%	57.59%	82.90%	67.48%	97.06%	80.32%
Amount to be recovered	**0.00**	**0.15**	**0.38**	**0.26**	**0.30**	**0.39**

The reasons and status of discharge of liabilities are attached as Annexure DG-I-10, 15 & 17 to these replies of data gaps.

Further, as submitted above in response of Data Gap 10 regarding challenges in discharging of liabilities of new units (Koradi Unit 8-10, Chandrapur 8-9 and Parli 8) and efforts taken by the Petitioner in discharging the liabilities, MSPGCL respectfully requests the Hon'ble Commission to approve an extension of the cut-off date to March 31, 2025, and to permit MSPGCL to approach the Commission after the discharge of liability. For schemes that are delayed beyond FY 2024-25 or UDL discharges delayed beyond FY 2024-25, MSPGCL seeks permission to submit the relevant details in the true-up petition for the respective year.

18. MSPGCL, in Table 30 of the Petition, submitted the impact of correction approved in Case No. 132 of 2023. MSPGCL to submit the computations of the same in MS Excel with appropriate formulae and linkages.

<u>MSPGCL's Reply</u>:

The computations of impact of correction approved in Case No. 132 of 2023 as mentioned in Table 30 is attached as Annexure DG-I-18.

19. MSPGCL, in para 6.2.7 of the Petition, submitted that it had inadvertently failed to include the expenses amounting to Rs. 27.99 Crore for the period from FY 2019-20 to FY 2021-22 towards the consumption of lubricants and consumables and commission to agents in the MTR petition. MSPGCL to submit documentary evidence for the same along with a reconciliation statement. Further, MPSGCL to submit the reasons as to why this has been claimed again when the same was rejected in the Review Petition by the Commission.

MSPGCL's Reply:

In review Petition (Case No. 132 of 2023) of Case No. 227 of 2022, the Petitioner had submitted that despite of best of efforts, failed to include certain claims towards agents, consumption lubricants and consumables in Petition No. 227 of 2022. Therefore, the Petitioner had sought allowance of the aforementioned expenses of Rs.27.79 Crore as a pass through in tariff and details were tabulated in table given below:

Particulars	FY 19-20		FY 20-21	FY 21-22	Total FY 19-20 to FY 21-22
	Commission to agents	Consumption Lubricants & consumables	Consumption Lubricants & consumables	Consumption Lubricants & consumables	
Bhusawal		0.00	0.02	0.01	0.03
Chandrapur	0.39	0.22	0.48	1.31	2.40
Khaperkheda	4.66	0.03	0.01	0.10	4.80
Koradi		0.93	0.12	0.72	1.77
Nashik		0.02	0.19	3.09	3.30
Uran		0.01	0.01	0.03	0.05
Paras Units 3 & 4		0.04	0.00	0.13	0.17
Parli Units 6 & 7		5.86	0.02	0.08	5.96
Khaperkheda Unit 5		0.08	0.90	0.86	1.84
Bhusawal Units 4 & 5		0.38	0.87	2.45	3.70
Koradi Units 8, 9 & 10		0.11	0.08	0.37	0.56
Chandrapur Units 8 & 9		0.68	0.03	0.60	1.31
Parli Unit 8		0.00	0.04	0.55	0.59
Hydro		0.41	0.81	0.09	1.31
Total	**5.05**	**8.77**	**3.59**	**10.38**	**27.79**

While ruling on the aforesaid issue in Review Order (Case No. 132 of 2023), the Hon'ble Commission has noted and ruled as under:

***"27. ISSUE XII: Expenses not claimed by MSPGCL in the MTR Petition**:*

MSPGCL's submission:

*27.1 MSPGCL, in the Review Petition, submitted that it had inadvertently failed to include the expenses amounting to **Rs. 27.99 Crore for the period from FY 2019-20 to FY 2021-22** towards the consumption of lubricants & consumables and commission to agents in the MTR Petition. MSPGCL requested the Commission to allow the same.*

***Commission's Analysis and Ruling**:*

27.2 The Commission notes that MSPGCL, in the Review Petition, submitted that it had inadvertently failed to include the expenses amounting to Rs. 27.99 Crore for the period from FY 2019-20 to FY 2021-22 towards the consumption of lubricants & consumables and commission to agents. MSPGCL requested the Commission to allow the same.

27.3 The Commission notes that the issue for review qualifies only upon the discovery of new and important matter or evidence which, after the exercise of due diligence, was not within his knowledge or could not be produced by the review Petitioner at the time when the direction, decision or order was passed or on account of some mistake or error apparent from the face of the record, or for any other sufficient reasons.

27.4 In this particular issue MSPGCL has itself not claimed these expenses in the MTR Petition. ***This issue does not qualify for review as the said expenses have not been claimed by MSPGCL in the MTR Petition. Therefore, the review sought by MSPGCL in this issue is not maintainable.*** *"* ***(Emphasis added)***

In light of the above ruling by the Hon'ble Commission, the Petitioner respectfully submits that while the claim was denied as it does not qualify for review. MSPGCL submits that it was an inadvertent error of omission of expenses incurred in FY 2019-20, FY 2020-21, FY 2021-22. Now in this petition, the Petitioner has included the differential claim for expenses related to the consumption of lubricants, consumables, and commission to agents for FY 2019-20, FY 2020-21, and FY 2021-22 in the current MYT Petition.

The Petitioner further submits that the Hon'ble Commission, in its ruling, mentioned the claimed amount as Rs. 27.99 Crore. However, the Petitioner submits that it has claimed Rs 27.79 Crores in review petition. To substantiate this claim, the Petitioner has reconciled the expenses with the Profit and Loss statements for the respective years, highlighting the unclaimed amounts. Additionally, a table detailing entitlement as per True-Up for these years has been provided, demonstrating that the claimed expenses exclude the unclaimed amounts being claimed in the present submission.

Furthermore, the Petitioner has included accounting ledger details from the SAP accounting software, showing that the total of these expense heads aligns with the unclaimed amounts now being claimed in this Petition. These details are presented in Annexure DG-I-19 as part of the responses to Data Gap Set I.

The Petitioner most respectfully submits that despite best efforts, the Petitioner inadvertently failed to include these expenses in the earlier MTR Petition. Therefore, the Petitioner respectfully requests the Hon'ble Commission to approve the claim of Rs. 27.79 Crore, as outlined above.

20. MSPGCL has submitted the details of the actual O&M expenses for FY 2022-23 in Table 44 page 104 including pay revision. MSPGCL to re-submit the breakup of O&M Expenses and Pay revision separately as done in Table no. 84 for FY 2023-24 of the petition.

MSPGCL's Reply:

MSPGCL submits that the Hon'ble Commission in Case No 227 of 2022 approved the Normative O&M expenses and Pay revision separately. During pay revision implementation old pay scales get merged with incremental rise and new pay scales are provided thus no identifiable trace of old scale remains in new pay scale and hence cannot be shown separately. The detailed rationale for the same is as below:

Pay revision agreement was signed in August ,2019, which was applicable for period Apr’2018 onwards. The revised pay-scales as per the pay-revision were made applicable in monthly salary from Oct’2019 and the arrears for the period Apr’2018 to Sept’2019 (18 months) were paid subsequently in 3 installments each for 6 months period, in FY 2019-20, FY 2020-21 & FY 2021-22 respectively.

Under the MYT petition filed in 2019 (Case No. 296/2019), provisional Employee expenses booking submitted for FY 2019-20 were inclusive of provision of Rs 239 Crore. On the basis of such pay revision annual impact estimate, Hon’ble Commission has allowed pay-revision impact on annual basis for the period FY 2019-20 onwards, under the order in case No. 296/2019, separately over and above the normative O & M costs, with directives to MSPGCL to submit the actual pay-revision impact in MTR petition.

In the MTR petition filed in 2022, the actual pay out towards pay-revision arrears for FY 2018-19 was available as these payments were made in two instalments, one in FY 2019-20 and another in FY 2020-21. For FY 2019-20 the arrears pay-out for first six months was available. This actual pay out for FY 2018-19 was used as base to arrive at pay revision component for FY 2019-20 as a whole and for the further years under the 4th MYT control period with respective escalation factor.

For the purpose of regulatory submission for true-up for FY 2019-20, to claim the actual O & M cost against the normative O & M, MSPGCL excluded provisions for pay revision of Rs 239.52 Crore, Pay revision arrears 1st instalment for FY 2018-19 and pay revision impact component included in actual salary for Oct’19 to Mar’20 from the total employee costs booked in FY 2019-20, as pay revision component was allowed separately.

Similar adjustments were made for FY 2020-21 and FY 2021-22 for arriving actual O & M costs claim against the normative O & M costs for the respective years as pay revision arrear instalments were paid in those years. However, as the regular monthly salary pay-out during this period was with revised pay scales, the annual pay-out computed on the basis of actual pay-out for FY 2018-19 with escalations was claimed under the MTR for true-up years against the pay-revision allowed under MYT order and the same was approved by Hon’ble Commission as submitted.

For FY 2022-23, there were no pay revision arrears or identifiable payments for previous financial years. The complete salary pay-out is as per the revised pay-scale. Thus, for these years MSPGCL has not shown the pay revision stream separately. For simpler comparison, MSPGCL has clubbed the approved normative O & M cost for FY 2022-23 and the approved pay-revision component together and this is compared with the actual O & M costs claimed. MSPGCL request Hon'ble Commission to accept such presentation of actual O & M expenses (with employee expenses without any separation) compared with (normative approved O & M cost clubbed with approved Pay revision stream) for the purpose of true up submission. Similar presentation is also made for FY 2023-24 and MSPGCL requests Hon'ble Commission to consider the same.

MSPGCL requests the Hon'ble Commission to consider normative O&M expenses for FY 2022-23 and FY 2023-24 as Normative O &M plus approved pay revision for computation of gain and losses.

21. MSPGCL has not submitted the Statement showing break up of Revenue & Expenses for FY 2022-23 between Un-regulated Business and Regulated Business in Annexure: 1 of Audited Annual Accounts of MSPGCL. By mistake MSPGCL has submitted a statement showing break up of Revenue & Expenses between Un-regulated Business and Regulated Business for FY 2023-234 twice. MSPGCL to submit the same.

MSPGCL's Reply:

The statement covering the breakup of Revenue & Expenses for FY 2022-23 between Un-regulated Business and Regulated Business is already provided in Annexure 1 (part II). However, the heading of the statement was inadvertently printed as year ended on 31.03.2024 instead of 31.03.2023. The same error has been rectified now and reconciliation statements of expense and revenue with the Audited Accounts for FY 2022-23 and FY 2023-24 are provided in DG-I-21.

22. MSPGCL in form 2.1 of Bhusawal unit 3 excel workbook has submitted the Annual net generation for FY 2024-25(Apr-Sep) as 876.55 MU, which doesn't match with Table 12 of 434.41 MU. MSPGCL to revise the figure accordingly.

MSPGCL's Reply:

The correct figure of net generation for FY 2024-25 (Apr-Sep) of Bhusawal Unit 3 is 435.41 MUs as submitted in Table 12 of the Petition. The correction in form 2.1 of Bhusawal unit 3 is made. The same is being submitted in revised formats for Bhusawal unit 3 which is being submitted along with revised Petition.
The Petitioner submits that the said details are being incorporated in the revised Petition.

23. MSPGCL to rectify the deficiencies in the Tariff Formats submitted, for each Station, as detailed in the Table below:

MSPGCL's Reply:

The point wise reply to the data gap is provided below.

Table 2: Deficiencies in Tariff Formats

Sl. No.	Form no.	Description	Remarks
1	2.3	Fuel Cost Details for Thermal Generation	1. Raw coal details to be submitted grade wise and Coal supplier wise. **MSPGCL's Reply**: It is submitted that each station of MSPGCL receives coal from a large number of collieries on a monthly basis. MSPGCL has already submitted the overall coal quantum procured and consumed in each of the station as part of this data gap replies. All the raw coal is procured from CIL under FSA and MoU route. The formats clearly provide the 'As billed', 'As Received' GCV of raw coal. MSPGCL has submitted the consolidated data for the coal received at its stations from various coal sources. The coal costs and related details submitted in the petition are as per the Audited Accounts, duly audited by the Statutory Auditors, and MSPGCL is also submitting the Reconciliation statements wherever required. As per as the data in details as requisitioned in the Data Gap query, it is to submit that the coal receipts to MSPGCL stations are from different collieries/ coal sidings and there are large variations in the Grades of the coal received. This makes the data management a complex process. As an example, to show the diverse data, following are number of different sources and Grade diversions in the coal received at MSPGCL's Chandrapur TPS and Khaperkheda TPS in the months of April'23, Sept'23, April'24 and Sept'24.

Chandrapur	Apr-23	Sep-23
WCL Raw Coal	No of mines- 15 to 16	No of mines- 15 to 16
	Grades- G10 to G13	Grades- G10 to G13
SCCL Raw Coal	No of mines- 02	No Supply
	Grades- G11	
SECL Raw Coal	No Supply	No Supply
MCL Raw Coal	No Supply	No Supply

Chandrapur	Apr-24	Sep-24
WCL Raw Coal	No of mines- 17 to 18	No of mines- 12 to 13
	Grades- G8 to G13	Grades- G8 to G13
SCCL Raw Coal	No of mines- 8 to 9	No of mines- 8 to 9
	Grades- G8 to G15	Grades- G8 to G15

SECL Raw Coal	No of mines- 1	No of mines- 1
	Grades- G11	Grades- G11
MCL Raw Coal	No Supply	No of mines- 2
		Grades- G15 & G14

Khaperkheda	**Apr-23**	**Sep-23**
WCL Raw Coal	No of mines- 10 to 11	No of mines- 10 to 11
	Grades- G10 to G13	Grades- G10 to G13
SCCL Raw Coal	No Supply	No Supply
SECL Raw Coal	No of mines- 5	No of mines- 5
	Grades- G7 to G15	Grades- G7 to G14
MCL Raw Coal	No of mines- 4 to 5	No of mines- 7 to 8
	Grades- G13 & G14	No of Grades- G11,G13,G14
MCL Washed Coal	No of mines- 3	No of mines- 3
	Grades- G13 & G14	Grades- G13 & G14

Khaperkheda	**Apr-24**	**Sep-24**
WCL Raw Coal	No of mines- 8 to 9	No of mines- 8 to 9
	Grades- G9 to G12	Grades- G9 to G12
SCCL Raw Coal	No Supply	No Supply
SECL Raw Coal	No of mines- 3	No of mines-7
	Grades- G9 to G15	Grades- G9 to G15
MCL Raw Coal	No of mines- 7 to 8	No of mines- 6 to 7
	Grades- G11 & G15	Grades- G11 & G15
MCL Washed Coal	No of mines- 3	No of mines- 3
	Grades- G13 & G14	Grades- G13 & G14

The Petitioner has submitted the practical difficulty in maintaining the raw coal grade wise and supplier wise through response to this data gap. In addition to the same, the Petitioner submits the pictorial representation of collieries (attached as Annexure DG-I-23-(1)) from which each station is receiving coal. Hence, Petitioner respectfully submits that required breakup of the details of coal received at stations are not possible to provide to the Hon'ble Commission.

2. Imported coal details to be submitted supplier wise.
MSPGCL's Reply:
The Petitioner further submits the details of supplier of imported coal are attached as Annexure DG-I-23 (2). From this Annexure, it is evident that there is a single supplier of imported coal for the particular station wherein imported coal has been used during FY

			2022-23 and FY 2023-24. In view of this, it is submitted that the imported coal received at respective stations are from the single respective imported coal supplier. 3. Details to be furnished for biomass pellets. **MSPGCL's Reply**: As submitted by the Petitioner in para 12.6 of the present Petition, for Khaperkheda TPS LoA dated 07.06.2024 awarded to M/s Avaneesh Chemicals and supply is expected to start from October 2024. Given the uncertainty in the availability and consistent supply of biomass pellets, MSPGCL has not currently included biomass pellets in its fuel mix. However, MSPGCL is actively making efforts to procure pellets and utilize them in its power stations in order to comply with the MoP guidelines. In case of usage of pellets in the MYT period FY 2025-26 to FY 2029-30, MSPGCL may be allowed to submit the claims towards such usage as part of the relevant period FAC computations, as and when the pellets are used. 4. Details of taxes and duties to be furnished separately for each type of fuel. **MSPGCL's Reply**: MSPGCL submits that levies on taxes and duties (Royalty, NMET, DMF, Crushing charges, Surface Transportation charges, GST compensation cess) are part of the landed fuel cost which is allowed under the Regulations. Further, the taxes and duties are always paid as per the notified rates which are provided in various circulars notified by the Ministry of Coal and CIL. Accordingly, each grade of fuel attracts standard levies and compilation of such information is not possible. Further, the fuel wise and company wise breakup of coal prices along with taxes and duties are attached as Annexure DG-I-23 (3) to these replies of data gap.
2	2.8	Forced Outages	Furnished as "Attached Separately"; but not enclosed with the Petition **MSPGCL's Reply**: It is submitted that the Form 2.8 for all the stations are attached as Annexure DG-I-23-(2) to these replies of data gaps set I.
3	15	Depreciation Schedule	Format left blank **MSPGCL's reply**: The requisite Form 15 will be submitted in due course during the proceedings of this Petition.
4	16	Fuel utilization plan	Mentioned as "Attached Separately", but salient features to be filled in this format as well **MSPGCL's reply:** Station wise F16 is attached as Annexure DG-I-23 (4) to these replies of data gap Set I.
5	17	Payment	Format left blank

		efficiency	**MSPGCL's reply:** MSPGCL submits that form 16 (Payment efficiency) is prepared for Mahagenco as a whole. The same is attached as Annexure DG-I-23-(5) to these replies of data gap Set I.

24. MSPGCL to submit the details regarding the coal availability for each Station (old and new separately) separately (in MS Excel) in the specified format below:

Table 3: Format for submission of details regarding coal availability

Month	**Coal Company**	**Prorata ACQ as per the FSA**	**Requirement given to the Coal Company**	**Quantum agreed to be supplied by the Coal Company**	**Requisition placed with Railways during the month**	**Actual quantum of coal supplied***	**Transfer to other Stations**	**Details of those Stations to which the coal has been transferred**	
		Ton	**Ton**	**Ton**	**Ton**	**Ton**	**Ton**	**Station**	**Ton**
Apr-22	WCL								
	….								
	Total								
May-22	WCL								
	….								
	Total								
……..	WCL								
	….								
	Total								
Mar-23	WCL								
	….								
	Total								
Total for FY 2022-23	WCL								
	….								
	Total								
Apr-23	WCL								
	….								
	Total								
May-23	WCL								
	….								
	Total								
……..	WCL								
	….								
	Total								
Mar-24	WCL								
	….								
	Total								
Total for FY 2023-24	WCL								
	….								
	Total								
Apr-24	WCL								
	….								
	Total								
May-24	WCL								
	….								
	Total								

Month	Coal Company	Prorata ACQ as per the FSA	Requirement given to the Coal Company	Quantum agreed to be supplied by the Coal Company	Requisition placed with Railways during the month	Actual quantum of coal supplied*	Transfer to other Stations	Details of those Stations to which the coal has been transferred	
		Ton	Ton	Ton	Ton	Ton	Ton	Station	Ton
…	WCL								
	….								
	Total								
Oct-24	WCL								
	….								
	Total								
Total for FY 2024-25 (upto Oct. '25)	WCL								
	….								
	Total								

**including the transfer to other stations, if any.*

<u>MSPGCL's Reply</u>:

The details regarding coal availability is provided in **Annexure DG 24** to these replies of data gap set I.

25. MSPGCL to submit the actual month wise fuel details for each Station (old and new separately) separately (in MS Excel) in the specified format below:

Table 4: Format for submission of fuel details

Particulars	UoM	FY 2022-23				FY 2023-24				FY 2024-25		
		April	May	…..	March	April	May	…..	March	April	…	October
Opening coal stock	MT											
Quantum of Coal received												
Source 1	MT											
Source 2	MT											
……	MT											
GCV of Coal (as billed)												
Source 1	kcal/kg											
Source 2	kcal/kg											
……	kcal/kg											
GCV of Coal (as received)												
Source 1	kcal/kg											
Source 2	kcal/kg											
……	kcal/kg											
Landed Price of Coal												
Source 1	kcal/kg											
Source 2	kcal/kg											
……	kcal/kg											
Transit Loss (Coal)												

Particulars	UoM	FY 2022-23				FY 2023-24				FY 2024-25		
		April	May	…..	March	April	May	…..	March	April	…	October
Source 1	%											
Source 2	%											
……	%											
Quantum of Coal fired												
Source 1	MT											
Source 2	MT											
……	MT											
GCV of Coal (as fired)												
Source 1	kcal/kg											
Source 2	kcal/kg											
……	kcal/kg											
Quantum of secondary fuel oil fired												
LDO	kL											
……	kL											
GCV of secondary fuel oil fired												
LDO	kcal/L											
……	kcal/L											
Landed price of secondary fuel oil												
LDO	Rs./kL											
……	Rs./kL											

MSPGCL's Reply:

The details of fuels are provided in **Annexure DG-I-25** to these replies of data gap set I.

26. MSPGCL to submit the year wise and station wise reconciliation of revenue as per the audited accounts for FY 2022-23, FY 2023-24 and FY 2024-25 in MS Excel in the format prescribed below:

Table 5: Format for submission of revenue reconciliation

Station/ Unit	Revenue item 1 (please specify)	Revenue item 2 (please specify)	….	Sub-total	Non-Tariff income	Total Revenue as per accounts
Bhusawal Unit 3						
Chandrapur Units 3-7						
Khaperkheda Units 1-4						
Koradi Unit 6						
Nashik Units						

Station/ Unit	Revenue item 1 (please specify)	Revenue item 2 (please specify)	….	Sub-total	Non-Tariff income	Total Revenue as per accounts
3-5						
Uran						
Paras Units 3&4						
Parli Units 6&7						
Khaperkheda Unit 5						
Bhusawal Units 4&5						
Koradi Units 8-10						
Chandrapur Units 8&9						
Parli Unit 8						
Koyna						
Bhira TR						
Tillari						
Other Hydro						
Lease Rent-Hydro						
Any other (please specify)						
Total						

<u>MSPGCL's Reply</u>:

It is submitted that the details of revenue reconciliation are provided in **Annexure DG-I-26** to these replies of data gap set I.

27. MSPGCL to submit the details of utilisation of revenue from sale of fly ash deposited into Fly Ash Utilisation Fund in the following format:

Table 6: Format for submission of details of utilisation of revenue from sale of fly ash

Sl. No.	Particulars	FY 2022-23 (Rs. Crore)	FY 2023-24 (Rs. Crore)	FY 2024-25 (Rs. Crore)
A	**Fly Ash Utilisation Fund**			
1	Opening balance			
2	Addition during the year			
3	Utilisation during the year			
4	Closing balance			

Sl. No.	Particulars	FY 2022-23 (Rs. Crore)	FY 2023-24 (Rs. Crore)	FY 2024-25 (Rs. Crore)
B	**Utilisation of the fund**			
1	Activity 1			
2	Activity 2			
3	……..			

MSPGCL's Reply:

The required details in connection with utilisation of revenue from sale of fly ash for FY 2022-23 and FY 2023-24 is provided below. MSPGCL further submits that the information given below is also available in note 31 of Audited accounts for the FY 2022-23 and FY 2023-24.

Sl. No.	Particulars	FY 2022-23 (Rs. Crore)	FY 2023-24 (Rs. Crore)
A	**Fly Ash Utilisation Fund**		
1	Opening balance	172.42	223.99
2	Addition during the year	70.29	126.34
3	Utilisation during the year	18.72	31.92
4	Closing balance	223.99	318.40
B	**Utilisation of the fund**		
1	Capital expenditure	6.05	26.41
2	Other expenses	12.67	5.51
3	**Total**	**18.72**	**31.92**

28. In accordance with Regulation 22.5 of the MYT Regulations, 2019 and Regulation 23.5 of the MYT Regulations, 2019, MSPGCL to make detailed submission on each of the following points:
    a. Least cost approach adopted while undertaking the DPR schemes.
    b. Mechanism put in place for monitoring the physical progress of projects with respect to their original schedule.
    c. Optimum drawal of loans in accordance with the physical progress of the capital expenditure schemes, and efficient utilisation of such loans.
    d. Detailed justification for the schemes that have not commenced during FY 2022-23 but approved for the year.
    e. Detailed justification for the schemes that have not commenced during FY 2023-24 but approved for the year.
    f. Detailed justification for the schemes that have not commenced during FY 2024-25 but approved for the year.

MSPGCL's Reply

As per this data gap, the detailed submission on each of the points are as under.

a) Least cost approach adopted while undertaking the DPR schemes.

Compliance:

- Implementation of various DPR schemes are undertaken through vendors/contractors/agencies selected through competitive bidding process.
- The same ensures that the prices are discovered in a transparent and objective manner.
- Further, for proprietary items, OEMs become the preferred choice wherein detailed due-diligence is performed based on the latest order placed on the OEM for supply of such items.
- The internal approval process for the proposed appointment of the vendors further ensures that detailed prudence is undertaken towards cost competitiveness of the offer price.
- As per the Capex Regulation Guidelines, MSPGCL carries out studies on the existing system proposed in the schemes through renowned Government/ Private Third party agencies. These third party agencies elaborate various least cost options and suggest/recommend the best suited least cost option for implementation of the scheme to enhance the system's Reliability, Availability and its service life.
- The sample vetting report of the Government/private third-party agencies are attached as Annexure DG-I-28(1) to these replies of data gap.

b) Mechanism put in place for monitoring the physical progress of projects with respect to their original schedule.

Compliance:

- To monitor the physical progress of the projects with respect to their original schedule following mechanisms are followed.
- Video conferencing (VC) is carried out between the Chief Engineer (Works) and the Deputy Chief Engineer & Head of (MPD) Maintenance planning division of individual power stations on monthly basis.
- During VC, physical statuses of the schemes are discussed and constraints, if any, regarding its implementation are resolved.
- Monthly Capex implementation status is sent by every station which includes the physical and the financial status of each and every scheme of various DPRs.
- For Civil related schemes, Chief Engineer (Civil-III) is the nodal officer, who is responsible for monitoring the physical & financial status of civil related schemes and sending the consolidated detailed report to Chief Engineer (Works) on monthly basis.

- For the completed schemes, Station sends the work completion and scheme completion report with all the capitalization details.
- It is submitted that the work completion reports (WCR) are already provided in Annexure DG-I-44 and 72.

c) **Optimum drawal of loans in accordance with the physical progress of the capital expenditure schemes, and efficient utilisation of such loans.**

Compliance:

- To monitor the financial progress of the projects with respect to their original schedule following mechanisms are followed.
- Capex Budget is allocated to the respective station / executing authority for effective implementation of the approved scheme in the respective
- year.
- Monthly Budget Utilization of various schemes is prepared by the Finance section of MSPGCL which contains the consolidated expenditure status of various schemes of various power stations.
- In addition to above, Video conferencing (VC) is carried out between the Chief Engineer Works and the Deputy Chief Engineer & Head of (MPD) Maintenance planning division of individual power stations on monthly basis. In VC financial status & progress of the schemes are discussed and constraints, if any, regarding its implementation are resolved.
- Monthly Capex implementation status is sent by every station which includes the physical and the financial status of each and every scheme of various DPRs.
- For the completed schemes, Station sends the work completion and scheme completion report with complete capitalization details.

d) Detailed justification for the schemes that have not commenced during FY 2022-23 but approved for the year.
e) Detailed justification for the schemes that have not commenced during FY 2023-24 but approved for the year.
f) Detailed justification for the schemes that have not commenced during FY 2024-25 but approved for the year.

<u>Compliance to Point (d), (e) and (f):</u>

1) MSPGCL submits that all expenses incurred by MSPGCL classified as DPR and Non-DPR schemes. The expenditure incurred under DPR schemes is initiated pursuant to approval of the schemes by the Hon'ble Commission.
2) However, the following complexities need to be appreciated for actual

implementation of approved capital expenditure:

- Lead time required for finalization of design specifications, tender documents and supply conditions
- For any change requested by the bidders, appropriate time extensions have to be provided as per prevailing guidelines
- Time required for evaluation of bids and establishment of reasonability of prices quoted by the bidders
- Retendering in case of lower participation by the bidders or price unreasonability, if any.
- Lead time for supply of items
- Actual implementation of schemes pursuant to supply of materials.

3) Given the complex nature of the schemes, the implementation may require shutdown or have to be undertaken at the time of annual overhauls. Any delay in supply of equipment's may defer the implementation to subsequent event of unit shutdown/forced outage. A combination of aforesaid factors therefore may lead to slippages in implementation of the schemes to the subsequent financial year.
4) MSGCL will be implementing the approved schemes in the ensuing years since the same are required to be implemented for reliable operations of the generating stations. The revised capitalization proposed by the Petitioner takes into consideration such spill over impacts as well.

29. MSPGCL, in Form 3.3 of the Tariff Formats, has submitted the item wise details of A&G expenses. MSPGCL to submit the justification for the following heads of A&G expenses as shown in the Table below:

a. Miscellaneous expenses
b. Others
c. HO/SE Coal/WM

<u>MSPGCL's Reply</u>:

MSPGCL submits that following expenses are included in the heads of expense sought in above query.

Miscellaneous Expenses	Audit Expenses
	Advertisement expenses
	Electricity charges
	Con-Entertainment
	Entertainment
	Con-Expd on meeting conference etc
	Expenditure on meetings conferences etc

	Upkeep of office
	Consumption -Upkeep of office
	Expn On Consumer Billing
	Miscellaneous exp
	Advertisement of tenders / notices and
	Incidental Stores & Material related Ex
	Expences on Energy saving certificate t
	Price variation 76 Group
	Gain/Loss on sale of Fixed Assets
Others	FG variance A/c Dr. / Cr.(W/o CE)
	Bad debts written off -advances to sup
	Shortage on physical verification of St
	Compensation-injuries Death and damages
	Compensation for injuries Death and dam
	Loss due to theft or natural calamities
	Write off deferred revenue expenditure
	Difference due to rounding off
	Loss due to Scrapping
	Corporate Social Responsibility Expend
	Loss on obsolescence of stores
	Profit / Loss on Exchange variance
HO/SE Coal/WM	Corporate office expenses.

The HO/SE Coal WM sections are expenses (corporate office expenses) incurred towards Head office, Coal office Nagpur etc which provide common services to all the generating stations.

30. Regulation 28.6 of the MYT Regulations, 2019 specify that the depreciation computations shall be submitted separately for assets added upto 31 March, 2020 and assets added on or after 1 April, 2020. MSPGCL to submit the depreciation for each of year of the Control Period from FY 2022-23 to FY 2024-25 in compliance with the Regulation 28.6 of the MYT Regulations, 2019.

MSPGCL's Reply:

The computation of depreciation for assets added upto 31 March, 2020 and assets added on or after 1 April, 2020 is attached as Annexure DG-I-30.

31. MSPGCL to submit the computations of escalation rate considered for computation of normative O&M expenses for FY 2022-23, FY 2023-24, and FY 2024-25 in MS Excel

with appropriate formulae and linkages.

MSPGCL's Reply:

MSPGCL submits that the detailed MS-Excel computations with appropriate formulae and linkages for escalation rate considered for computation of normative O&M Expenses for FY 2022-23, FY 2023-24 are attached in Annexure DG-I-31 to these replies of data gap set I. It is submitted that FY 2024-25 is ongoing and monthly WPI and CPI numbers are available partly, hence the escalation rate for FY 2024-25 has been considered the same as the rate computed for FY 2023-24.

32. MSPGCL to submit the ITR acknowledgement for FY 2022-23 and FY 2023-24.

MSPGCL's Reply:

The ITR acknowledgment for FY 2022-23 (i.e. AY 2023-24) and FY 2023-24 (i.e. AY 2024-25) is attached as Annexure DG-I-32.

33. MSPGCL to provide the income tax assessment orders for AY 2023-24 and AY 2024-25.

MSPGCL's Reply:

MSPGCL submits that:

1. The income tax assessment order for AY 2023-24 is attached as Annexure DG-34. The same is attached as Annexure DG-I-33
2. Assessment for AY 2024-25 is yet to be initiated. Consequently, the Assessment Order for AY 2024-25 has not been received from Income Tax Department.

II. True-up for FY 2022-23

34. MSPGCL to submit the copies of fuel bills for the months of April, July, October 2022 and January 2023 clearly segregating the same for each Station/Unit.

MSPGCL's Reply:

The copies of fuel bills as sought above are attached as Annexure DG-I-34 to the replies of data gap set I.

35. MSPGCL, in Table 31 of the Petition, submitted the Availability and PLF for all its Stations for FY 2022-23. MSPGCL also submitted the SLDC certificates for actual Availability and PLF for FY 2022-23. It has been observed that the SLDC certificates does not include the overall actual Availability and PLF for each Station/Unit for the

year as submitted in Table 31. MSPGCL to submit the certification of SLDC for the actual Availability and PLF as submitted in Table 31.

MSPGCL's Reply:

It is submitted that as per Regulation 50.1 of MERC (MYT) Regulations 2019, capacity charges shall be recovered under two segment of the year, i.e., High Demand Season (period of three months) and Low Demand Season (period of remaining nine months), SLDC certifies availability and within each season in two parts, viz., Capacity Charge for Peak Hours of the month and Capacity Charge for Off-Peak Hours of the month. Accordingly, SLDC has been certifying availability based on the data submitted by the Petitioner for pr-rata recovery of AFC. In Table 31 of the Petition, availability specified for High demand and low demand season (in peak and off peak hours) may be verified from the average availability for high and low demand season certified in SLDC certificate. Further, the Petitioner submits that the total availability and PLF specified in the table 31 of the Petition is weighted average of availability and PLF mentioned for high and low demand season into peak and off peak hours.

The excel working for computation of annual PLF and AVF based on the peak / off peak period AVF in HDS / LDS is enclosed as **Annexure DG-I-35**.

36. MSPGCL, in para 7.2.1 of the Petition, submitted key reasons for low Availability of its Stations in FY 2022-23. MSPGCL to submit the generation loss for each Station (old and new separately) on account of each reason.

MSPGCL's Reply:

The reason wise loss in % Availability factor for FY 2022-23 on account of each major reason for each station is as tabulated below.

STATION	HIGH DEMAND SEASON		LOW DEMAND SEASON		Reasons for deviation
	Peak AVF	Off Peak PLF	Peak AVF	Off Peak PLF	
BHUSAWAL (Unit 3)	61.11%	61.04%	55.11%	55.42%	**HDS** : Critical coal stock (12.37 %),Poor coal quality (8.31 %),Governing problem (9.48 %) **LDS** : Critical coal stock (8.88 %),Poor coal quality (6.89 %),Wet coal problems (9.29%),Boiler tube elakage (7.23% %)
BHUSAWAL (Unit 4-5)	81.35%	81.37%	75.53%	74.52%	**HDS** : Critical coal stock (6.41 %) **LDS** : Poor coal quality (5.29 %),Wet coal problems (6.96%),Boiler tube elakage (3.17% %)
KHAPARKHEDA (Unit 1- 4)	69.86%	68.56%	61.45%	62.01%	**HDS** : Poor coal quality (10.57 %),Boiler tube /Pr.part leakage (3.36 %), Clinker formation (3.82%), Airpreheater problem(3.07%) **LDS** : Critical coal stock (3.87 %),Poor coal quality (11.52 %),Wet coal problems (3.42%),Boiler tube/pr part leakage (2.45 %), Coal cycle problem(2.51%),Clinker formation (2.76%)
KHAPARKHEDA U # 5	89.89%	91.41%	82.28%	82.61%	AVF achieved in HDS. Loss of AVF during LDS mainly due to Poor coal quality (8.11 %)
NASHIK (Unit 3-5)	71.65%	72.15%	63.79%	63.74%	**HDS** : Critical coal stock (11.51 %) **LDS** : Poor coal quality (9.64 %),Wet coal problems (18.39%)
CHANDRAPUR (Unit 3-7)	68.16%	68.10%	46.50%	46.88%	**HDS** : Poor coal quality (6.69 %),Boiler tube leakage (3.30 %), Ash handling system (8.63%) **LDS** : Critical coal stock (1.61 %),Poor coal quality (5.84 %),Wet coal problems (7.42%),U7 Outage for Turbine problem (12.79%)
CHANDRAPUR (Unit-8 & 9)	88.64%	88.53%	80.56%	79.62%	AVF achieved in HDS. Loss of AVF during LDS mainly due to Poor coal quality (4.03 %) & Wet coal problems (4.28 %)
PARAS (Unit 3- 4)	82.37%	82.67%	67.98%	68.07%	**HDS :** Critical coal stock (1.36 %),Poor coal quality (6.23 %) **LDS :** Poor coal quality (8.09 %), Wet coal problems (5.69 %), U-4 Outage for turbine brg problem (3.37 %)
PARALI (UNIT 6-7)	77.35%	78.10%	73.29%	73.87%	**HDS :** Critical coal stock (4.51 %),Poor coal quality (1,30 % ,Boiler tube elakage (8.95%%) **LDS :** Critical coal stock (6.17%),Poor coal quality (2.12 %), Boiler tube leakage(1.80 %),Coal cycle problem(1.76%)
PARALI (UNIT 8)	52.01%	52.73%	55.76%	55.66%	**HDS :** Critical coal stock (6.83 %),Boiler tube elakage (3.50%%),Condenser Vacuum (11.70%) **LDS** : Critical coal stock (7.22%),Poor coal quality (4.60 %),Wet coal problems (2.43%),Boiler tube/Pr.part leakage (4.35%)Coal cycle problem(8.90%),Condenser vacuum (6.05 %)
KORADI (Unit 6)	79.85%	80.43%	67.48%	68.58%	AVF achieved in HDS. Loss of AVF during LDS mainly due to Poor coal quality (5.40 %) & Wet coal problems (7.05 %)
KORADI (Unit- 8, 9 & 10)	74.38%	73.63%	60.85%	60.29%	**HDS :** Poor coal quality (6.63%),Boiler tube elakage(5.22%) **LDS** : Unit 08 & 09 were under shutdown for Annual overhaul (9.53 %), Poor coal quality (14.02%, Wet Coal problem (2.23 %),Boiler Tube Leakage (7.16 %)
GTPS URAN (Unit 5 - 10)	33.62%	34.50%	23.24%	23.51%	Annual average gas availability was 1.16 MMCMD against the contracted quantity of 3.5 MMCMD.

The reason wise and station wise generation loss is attached as Annexure DG-I-36 to these replies of data gaps.

37. The Commission, in the Order dated 8 March, 2022 in Case No. 133 of 2021, approved the normative SHR of 2350 kcal/kWh for Koradi Unit 6, as proposed by MSPGCL. Whereas, in the present Petition, MSPGCL has claimed the SHR of 2456 kcal/kWh for Koradi Unit 6. MSPGCL to submit the justification for seeking revision of the SHR of Koradi Unit 6.

MSPGCL's Reply:

Regulation 47.5 of the MERC (MYT) Regulations 2024 prescribes an SHR of 2622 kCal/kWh for Koradi excluding Unit 8,9 and 10 (i.e. Unit 6). However, the Petitioner submits that the SHR approved under the previous regulations accounted for both Koradi Units 6 and 7. Given that Koradi Unit 6 continues to operate following the retirement of Unit 7, the Petitioner has not considered the higher SHR of 2622 for the MYT projections.

The guaranteed SHR for the unit is 2350 kCal/kWh which was submitted by the Petitioner , in the year 2009 , while submitting the DPR for In-principle approval of Hon'ble Commission as Guaranteed SHR at 100% MCR operation after completion of EE R & M with levelised SHR over the year projected at 2544 kcal/kWh = (Design heat rate+50)*1.06,where 50 kcal/kWh was the variation of operation correction from design parameters and 6% allowance as per CERC norms prevailing at that time. While according In-principle approval, vide letter dated Hon'ble Commission has mentioned following regarding SHR

"4. The Commission notes that although the levellised gross heat rate of the unit is assumed as 6% higher than the design heat rate, all efforts will be made by MSPGCL to improve the performance and bring the same in line with the normative heat rate stipulated in the MERC Terms and Conditions of tariff Regulations."

The Petitioner submits that for the new generating stations, an allowance of 4.5% from the design SHR is allowed in order to factor local operating conditions and deviations in overall quality of coal and associated parameters. Accordingly, Petitioner has requested that the normative SHR may kindly be considered as 2350*1.045 = 2456 kCal/kWh.

38. MSPGCL, in para 7.2.2 of the Petition, submitted key reasons for high SHR of its Stations in FY 2022-23. MSPGCL to submit the increase in fuel cost for each Station (old and new separately) on account of each reason.

MSPGCL's Reply:

MSPGCL respectfully submits that the major factors contributing to the deviation in Station Heat Rate for FY 2022-23 are tabulated below. However, it is typically the result of multiple root causes operating concurrently, and it is only in rare instances that a single specific cause is solely responsible. Consequently, it is difficult to quantify the exact loss of generation attributable to each individual factor.

STATION	Actual	Reasons for deviation
BHUSAWAL (Unit 3)	3085	1) Low PLF / partial loadabilitty due to Poor Coal Quality & Wet coal. (Actual Coal CV 2879 Kcal/kg, Design CV 5000 Kcal/kg) 2) Excess oil consumption, 19 times start-up out of this 7 times cold start-up. 3) Unit run fpr long period without overhaul..Last AOH carried out in 2016.
BHUSAWAL (Unit 4-5)	2417	1. Average Bunkered Coal GCV was 2981 kcal/kg against desgin Coal 3400 kcal/kg. 2. Coal Factor was on higher side i.e.0.804 kg/kwh due to Lumpy& Wet Coal. 3. Excess Oil consumption for flame stabilty due to Wet and Lumpy coal.
KHAPARKHEDA (Unit 1- 4)	2726	Low PLF / Partial loadability and high oil consumption
KHAPARKHEDA U # 5	2463	9 number's of forced outages (2.86%), partial loading outages (18.63%), so loadability (80.82%) was reduced .
NASHIK (Unit 3-5)	2781	Low PLF / Partial loadability and high oil consumption
CHANDRAPUR (Unit 3-7)	2733	Partial loadability as Actual PLF was 48.34 %, High Oil consumption i.e. Oil component is @ 48 Kcal/Kwh
CHANDRAPUR (Unit- 8 & 9)	2386	HR slightly deviated from normative as Actual PLF was 76.24 %.
PARAS (Unit 3- 4)	2447	1) Due to Poor Coal Quality & Wet coal. (Actual Coal CV 3138.44 Kcal/kg, Design CV 3400 Kcal/kg) 2) Excess oil consumption, 43times start-up out of this 7 times cold start-up.
PARALI (UNIT 6-7)	2517	Low PLF / Partial loadability and high oil consumption
PARALI (UNIT 8)	2536	Low PLF / Partial loadability and high oil consumption
KORADI (Unit 6)	2603	Achieved
KORADI (Unit- 8, 9 & 10)	2480	Heat Rate is on higher side due to partial loading on account of Poor Coal Quality, Wet Coal Problem, CHP Problems, BTL, LDBD,Condenser Vaccum etc. and more number of forced outages. Also Coal GCV is less as compared to Design GCV due to which loadability was less and higher Heat Rate.
GTPS URAN (Open cycle)	3154	GT-5&6 were on open cycle mode from 07.09.2022 on wards. There was no continuous schedule to these open cycle units and these units were synchronized/withdrawn according to the demand of LD Kalwa and also considering the actual gas availability. Due to these factors there were increased synchronization/withdrawals which resulted in high heat rate. Also, the gas turbines of GTPS Uran are 39 years old and Steam turbines are 30 years old. As the useful life of the plant has been passed by, the heat rate norms may not be achievable.
GTPS URAN (Combine cycle))	2156	Due to the less gas availability, the steam turbines of GTPS Uran were often operated on 1GT-1 ST combination. Single GT operations of steam turbine increase the heat rate significantly. Also less gas availability leads to increase in withdrawal and rolling of the machines. Increase in number of machine synchronizing also leads to increase in heat rate. In the year 2022-23, the gas turbines were withdrawn 39 times due to gas shortage while in combine cycle mode of operation. Also, the gas turbines of GTPS Uran are 39 years old and Steam turbines are 30 years old. As the useful life of the plant has been passed by, the heat rate norms may not be achievable.

39. MSPGCL, in para 7.2.3 of the Petition, submitted key reasons for high SFOC of its Stations in FY 2022-23. MSPGCL to submit the increase in fuel cost (in Rs. Crore and in Rs/kWh) for each Station (old and new separately) on account of each reason.

MSPGCL's Reply:

MSPGCL respectfully submits that the major factors contributing to the deviation in secondary fuel oil consumption (SFOC)for FY 2022-23 are tabulated below.

STATION	Actual	Reasons for deviation
BHUSAWAL (Unit 3)	5.757	Oil Support for flame stability to avoid tripping (Poor Coal Quality & Wet coal problem), 19 start-ups , out of this 7 times cold start-up.
BHUSAWAL (Unit 4-5)	2.027	More number of startups (Total 32 startups),Excess Oil consumption for Flame stability & Wet coal problems
KHAPARKHEDA (Unit 1-4)	4.910	No of trippings on higher side (Total 50 startups)
KHAPARKHEDA U # 5	0.334	MERC Normative Achieved
NASHIK (Unit 3-5)	4.552	More number of startups (Total 36 startups),Oil Support for flame stability to avoid tripping (Poor Coal Quality & Wet coal problem),
CHANDRAPUR (Unit 3-7)	4.759	Wet Coal problems,more startups (63 Nos)
CHANDRAPUR (Unit- 8 & 9)	0.363	MERC Normative Achieved
PARAS (Unit 3- 4)	1.743	Oil Support for stability of unit and to avoid unnecessary tripping due to Poor Coal Quality (flame stability) & O&M problems due to Wet coal . Excess oil consumption, 43times start-up out of this 7 times cold start-up.
PARALI (UNIT 6-7)	3.779	More Forced outage, O&M problems , multiple start ups = 38 nos
PARALI (UNIT 8)	5.147	More Forced outage, O&M problems , multiple start ups = 14 nos
KORADI (Unit 6)	5.586	More number of unit start-ups, wet & Sticky coal problem during Monsoon, low system demand, Flame instability due to PCQ and Coal Handling Plant problems
KORADI (Unit- 8, 9 & 10)	0.635	More number of startups, wet coal problem, ID Fan Problem, Bottom Ash Evacuation problem, system problem, low system demand, Flame unstability and Coal Handling Plant problems

The reason-wise impact on SFOC in ml/kWh and corresponding increase in fuel cost in Rs. Crore as well as in Rs./kWh , on approximate basis, are as per attached Annexure DG-I-39 and 67.

40. MSPGCL, in para 7.2.4 of the Petition, submitted key reasons for high Auxiliary Consumption of its Stations in FY 2022-23. MSPGCL to submit the generation loss for each Station (old and new separately) on account of each reason.

<u>MSPGCL's Reply</u>:

MSPGCL respectfully submits that the major factors contributing to the deviation in auxiliary power consumption for FY 2022-23 are tabulated below. However, it is typically the result of multiple root causes operating concurrently, and it is only in rare instances that a single specific cause is solely responsible. Consequently, it is difficult to quantify the exact loss of generation attributable to each individual factor.

STATION	Actual	Reasons for deviation
BHUSAWAL (Unit 3)	14.56%	1) Increase in APC is mainly due to RSD (Zero Schedule by MSEDCL) & External Forced trippings. 2) Partial loss due to LDBD, Wet Coal, Poor Coal Quality & Poor Coal Receipt. 3) Total 18 nos trippings (19 start-ups). 4) Last AOH carried out in 2016.
BHUSAWAL (Unit 4-5)	6.36%	1. Excess APC due to partial loading due to LDBD, PCQ & Wet Coal. 2. Excess APC due to Unit No.5 out for AOH for the period of 34 days.
KHAPARKHEDA (Unit 1-4)	11.25%	Low PLF / Loadability -63.936%, more no of outages
KHAPARKHEDA U # 5	5.85%	Achieved
NASHIK (Unit 3-5)	12.61%	Low PLF / Loadability -66 %, more no of outages
CHANDRAPUR (Unit 3-7)	11.09%	Loadability was 62.64 %. Running of MDBFP at part load operation & during unit startups as well as LDBD leads to additional APC of 1.35% (i.e excluding LDBD & MDBFP it was 9.75 %)
CHANDRAPUR (Unit- 8 & 9)	5.51%	Achieved
PARAS (Unit 3- 4)	10.98%	Partial loss due to LDBD, Wet Coal, Poor Coal Quality & Poor Coal Receipt, Total 43 nos trippings (43 start-ups)
PARALI (UNIT 6-7)	11.58%	Partial loadability and Lowwr PLF as mentioned in PLF deviation reasons
PARALI (UNIT 8)	13.59%	Partial loadability and Lowwr PLF as mentioned in PLF deviation reasons
KORADI (Unit 6)	11.28%	APC is on higher side as generation is less due to partial loading on account of Poor Coal Quality, Wet & Sticky Coal Problem, CHP Problems, BTL, LDBD, Condenser Vacuum Mini Overhaul (Planned Outage) etc.
KORADI (Unit- 8, 9 & 10)	7.34%	APC is on higher side as generation is less due to partial loading on account of Poor Coal Quality, Wet Coal Problem, CHP Problems, BTL, LDBD,Condenser Vaccum etc. and Unit 8 & 9 Annual Overhaul.
GTPS URAN (Open cycle)	1.82%	From 07.09.2022 to 20.11.2022, all gas turbine units of GTPS Uran were available in open cycle mode only. Both steam turbines were under shut down and the standby consumption of the steam turbines auxilliaries got added in the total station auxilliary power consumption. This incresed the open cycle Auxiliary power consumption
GTPS URAN (Combine cycle))	3.11%	Due to less gas availability, Out of the total service hours of 7536 Hrs the steam turbines were in 1GT-1 ST combination for 6058 Hrs . The auxiliary consumption on the steam turbine side remains almost the same for both single GT and double GT operations, but the generation reduces by 50%. These single GT operations resulted in high APC.

41. With regards to coal related issues faced by MSPGCL in FY 2022-23, MSPGCL to submit the details of GCV on "As Received" and "As Billed" basis from each coal source along with sample documentary evidence for substantiating such difference.

<u>MSPGCL's Reply</u>:

The details of GCV on "As Received" and "As Billed" basis with sample documentary evidence for substantiating such difference is attached as Annexure DG-I-41 to these replies of data gap set I.

42. MSPGCL, in para 7.2.1.2 of the Petition, submitted that the actual supply of gas for Uran was 1.16 MMSCMD against the overall requirement of 3.5 MMSCMD. MSPGCL to submit the supporting documents to substantiate the actual gas receipt in FY 2022-23.

<u>MSPGCL's Reply</u>:

The bills for gas received at Uran GTPS during FY 2022-23 are attached as

Annexure DG-I-42.

43. MSPGCL in para 7.3.5.5. submitted that revised normative fuel cost for FY 2022-23 has been worked out considering GCV loss of 750 kCal/kg. MPSGCL to also submit the scenario of revised normative fuel cost for FY 2022-23 considering the GCV loss of 650 kCal/kg as approved in provisional true-up for FY 2022-23.

MSPGCL's Reply:

The working of normative fuel cost for FY 2022-23 considering GCV loss of 650 kCal/kg is enclosed as **Annexure DG-I-43**.

In light of the sub-judice matter before the Hon'ble APTEL regarding GCV variation in GCV "As billed" and "As Received", the Petitioner is revising its normative fuel cost claim in the revi sed Petition, considering the permissible limits of 600 kcal/kg for FY 2022-23. Consequently, the prayers in the revised Petition are also being updated accordingly.

44. MSPGCL to submit the documentary evidence of all the assets put to use during FY 2022-23 clearly segregating the same station/unit wise.

MSPGCL's Reply:

MSPGCL submits that work completion report for the assets put to use during FY 2022-23 is attached as Annexure DG-I-044 & 72 to these replies of data gap set I.

45. MSPGCL, in Table 43 of the Petition, submitted the details of Revised O&M Expenses for FY 2022-23. However, it is observed that there is a mismatch between the Water Charges claimed for Bhusawal Unit 3 in Table 43 (Rs 16.34 Crore) and Table 44 (Rs 13.85 Crore) and also for the total water charges. MSPGCL to submit the justification for the same and provide the reconciliation based on the Audited Accounts for FY 2022-23.

MSPGCL's Reply:

The correct amount of actual water charges of Bhusawal Unit 3 for FY 2022-23 is Rs.13.85 Crore as mentioned in Table 44. Accordingly, the amount in Table 43 is corrected in the revised tariff model of Bhusawal Unit 3. The same shall be submitted along with revised tariff models.

46. MSPGCL, in Table 44 of the Petition, submitted the actual water charges for FY 2022-23 as Rs. 322.72 Crore. In this regard, MSPGCL to submit the supporting documents to substantiate the actual water charges claimed for each Station/Unit.

MSPGCL's Reply:

The documentary evidence of actual water charges for FY 2022-23 are attached as Annexure -DG-I-46 to these replies of Data gap Set I.

47. MSPGCL, in Table 44 of the Petition, submitted the actual other charges for FY 2022-23 as Rs. 295.06 Crore. In this regard, MSPGCL to submit the details of the same supporting documents to substantiate the actual other charges for each Station/Unit.

MSPGCL's Reply:

MSPGCL submits that the certificate of Chartered Accountant for thermal stations is attached as Annexure DG-I-47.

48. MSPGCL, in Table 44 of the Petition, submitted the actual O&M Expenses including the impact of pay revision for FY 2022-23. MSPGCL to submit the detailed break-up of O&M Expenses excluding the impact of pay revision and the details of impact of pay revision for FY 2022-23.

MSPGCL's Reply:

MSPGCL submits that the Hon'ble Commission in Case No 227 of 2022 approved the Normative O&M expenses and Pay revision separately. During pay revision implementation old pay scales get merged with incremental rise and new pay scales are provided thus no identifiable trace of old pay scales remains in the new pay scale and hence cannot be shown separately. For detailed rationale please refer the reply to Data Gap point No. 20 above.

MSPGCL requests the Hon'ble Commission to consider normative O&M expenses for FY 2022-23 and FY 2023-24 as Normative O &M plus approved pay revision for computation of gain and losses.

49. MSPGCL, in Table 44 of the Petition, submitted the details of the Other charges for SHP and Koyna 2022-23. These values does not match with the value submitted in Form 10 submitted along with the Petition. MSPGCL to reconcile the same and revise the claim accordingly.

MSPGCL's Reply:

It is submitted that the Other Charges in Form 10 for SHP & Koyna also contains the Lease Rent for FY 2022-23. The reconciliation of other charges shown in Table 44 and total other charges reflected in form 10 are provided below:

Stations	Other charges	Hydro lease rent	Total as per form 10

	(Table 44)		
SHP	0.95	233.35	**234.29**
Koyna	0.47	307.85	**308.32**

50. MSPGCL, in para 7.3.7.6 of the Petition, submitted that it has considered the normative O&M expenses for Koradi Unit 6 as two-thirds of the amount approved by the Commission for FY 2021-22 in the MTR Order, escalated for FY 2024-23, accounting for the common auxiliaries that cannot be dismantled and accordingly calculated the revised normative O&M expenses for Koradi Unit 6 for FY 2022-23. MSPGCL to submit detailed justification for such claim.

MSPGCL's Reply:

In the context of O & M costs claimed for Koradi Unit # 6, the Petitioner has submitted the following under the Para 7.3.7.6 & 8.2.5.7 of the MYT petition.

> *"It appears that the normative O&M expenses for Koradi Unit 6, approved by the Hon'ble Commission in the MTR Order from FY 2022-23 onwards, were based on the operation of two units (Units 6 and 7). However, since Unit 7 has been retired and only Unit 6 remains operational, the Petitioner has considered the normative O&M expenses for Koradi Unit 6 as two-thirds of the amount approved by the Hon'ble Commission for FY 2021-22 in the MTR Order, accounting for the common auxiliaries that cannot be dismantled and accordingly calculated the revised normative O&M expenses for Koradi Unit 6 for FY 2022-23."*

Following is the rational for raising O & M claim at 2/3rd of O & M for Units # 6 & 7 combined:

a) Under Stage III of the Koradi TPS, three units—Unit #5 with a capacity of 200 MW and Units #6 and #7 with capacities of 210 MW each—were commissioned between 1978 and 1983. These units, based on LMW technology, shared a combined "Balance of Plant" auxiliary system that served all three units collectively.

b) Following the retirement of Unit #5 in 2017 and Unit #7 in 2021, the main plants for these units were stopped. However, as the common systems were still essential for supporting Unit #6, they had to remain operational, although at a reduced load. Consequently, the overall operation and maintenance (O&M) requirements did not reduce proportionally to the retirement of two units. Instead, the costs remained significant, exceeding half of what was previously required when two units were operational.

c) The following common systems/auxiliaries, shared by all three units, were maintained in operation even after the decommissioning of Units #5 and #7.

  a. Oil Handling Plant
  b. Ash Slurry Pump House
  c. Clear Water Pump House
  d. Ash Booster Pump House
  e. Compressor House
  f. Workshop
  g. CT Fan
  h. CTPL Pump House
  i. Safety
  j. WTP
  k. 6.6 KV Station Board
  l. Fire fighting Pump House /DG Set.
  m. CHP
  n. Ash Water Recovery
  o. GS Pump House
  p. Raw Water Pump House
  q. Major Store
  r. Purchase
  s. MPD
  t. Security
  u. HR
  v. Account
  w. Civil
  x. Hospital
  y. Colony Civil
  z. Colony Electrical
  aa. Vehicle Maintenance

d) The BoP systems mentioned above are extensive, consisting of numerous smaller individual systems and pieces of equipment. Additionally, these systems are spread over a wide area, necessitating the deployment of substantial manpower (both regular employees and contract labor) to ensure their operation.

e) When Units 6 and 7 (2x210 MW) were operational, the sanctioned staff strength was 872, with 566 MSPGCL employees actually working. After the decommissioning of Unit 7 on August 3, 2021, the sanctioned posts were reduced to 572, with the current working staff at 476. Attached are staff position statements for April 2021 and November 2024 for comparison.

f) Following the decommissioning of Unit 7, the current working MSPGCL staff is approximately 85% of the 566 employees who were working in 2021 when both units were operational. A similar level of labor manpower is also required. In the present scenario, manpower costs for MSPGCL account for approximately 60–70% of the total O&M costs.
g) Similarly, the costs for Repairs and Maintenance (R&M) and Administrative and General (A&G) expenses are also significantly impacted. The continued operation of the shared systems results in the R&M and A&G costs for a single unit being more than half of the corresponding costs when two units were operational.
h) Therefore, the Petitioner has approximated the O&M costs for Koradi Unit #6 as two-thirds of the total O&M costs incurred when both units were in operation.

51. MSPGCL, in Table 48 of the Petition, claimed IT Expenses of Rs. 17.50 Crore in addition to the normative O&M Expenses. In this regard, MSPGCL to submit the detailed break up with justification for claim of such expenses as it is already considered under A&G expenses.

<u>MSPGCL's Reply</u>:

In the present Petition, it is submitted that IT expenses have been inadvertently claimed as Rs. 17.50 Crore instead of the correct amount of Rs. 21.45 Crore for FY 2022-23. MSPGCL submits that this correction will be incorporated in the revised Petition and tariff format. A detailed breakup of the Rs. 21.45 Crore and the justification for the utility of IT expenses are provided in Annexure DG-I-51 & 78 as part of the responses to Data Gap Set I.

As per Regulation 47.1(g), IT-related expenses are allowed over and above the normative O&M expenses. However, since IT expenses are categorized under A&G expenses in Head Office (H.O.) expenses and subsequently allocated to the stations. Consequently, since IT expenses are included within A&G expenses, they are subject to the sharing of gain and losses for O&M expense, which prevents them from being allowed at actuals over and above normative values.

In light of the above regulatory provision, which explicitly allows IT expenses over and above the normative O&M expenses, the Petitioner respectfully requests the

Hon'ble Commission to approve the IT expense claim of Rs. 21.45 Crore over and above normative O&M expenses, without subjecting it to the sharing of gains or losses.

52. MSPGCL to submit the supporting documents to substantiate the actual rate of interest on long term loan claimed for each Station/Unit for FY 2022-23.

<u>MSPGCL's Reply</u>:

MSPGCL submits that interest rate circulars of PFC and REC are attached as Annexure DG-I-52.

53. MSPGCL, in Table 50 of the Petition, claimed the actual finance charges of Rs. 27.67 Crore. MSPGCL to submit the supporting documents to substantiate the actual finance charges claimed for each Station/Unit.

<u>MSPGCL's Reply</u>:

MSPGCL submits that supporting documents in connection finance charges of Rs.27.67 Crore is attached as Annexure DG-53.

54. MSPGCL, in para 7.3.10.10 of the Petition, submitted loss of interest on Late Payment Surcharges of Rs. 1114.08 Crore. MSPGCL to submit the detailed calculation of the same in MS Excel with appropriate formulae and linkages.

<u>MSPGCL's Reply</u>:

MSPGCL submits the detailed MS-Excel computations with appropriate formulae and linkages for loss of interest on Late Payment Surcharges of Rs. 1114.08 Crore are attached in **Annexure DG-I-54** to these replies of data gap set I

55. MSPGCL, in Table 52 of the Petition, claimed the actual interest on working capital of Rs. 1475.16 Crore. MSPGCL to submit the supporting documents to substantiate the actual interest on working capital claimed for each Station/Unit.

<u>MSPGCL's Reply</u>:

MSPGCL submits that relevant documents such as interest rate circulars, sanction letters are attached as Annexure DG-I-55.

56. MSPGCL, in Table 57 of the Petition, inadvertently referred to Koyna as Pophali.

MSPGCL to rectify the same.

<u>MSPGCL's Reply</u>:

The aforesaid correction has been done in table 57. The same shall be reflected in the revised/updated Petition as shown below:

Particulars	Unit	Koyna	Bhira	Tillari	Total
Fixed Cost for Hydro	Rs. Crore	140.53	9.61	17.01	167.16
Normative Availability	%	90%	90%	90%	
Actual Availability	%	92.86%	99.10%	96.67%	
Normative Capacity Charge	Rs.Crore	70.27	4.81	8.51	83.58
Design Energy	MU	3,158.00	70.00	106.06	3,334.06
Auxiliary Consumption	%	1.13%	0.70%	1.20%	
Net Design Energy	MU	3122.31	69.51	104.79	3,296.61
Energy Charge Rate	Rs./Kwh	0.23	0.69	0.81	
Actual Net Generation	MU	3450.12	94.15	126.33	3,670.60
Energy Charge billed	Rs. Crore	77.64	6.51	10.26	
AFC incentive	Rs. Crore	2.23	0.49	0.63	3.35
VC Incentive	Rs. Crore	7.38	1.70	1.75	10.83
Total incentive	**Rs. Crore**	**9.61**	**2.19**	**2.38**	**14.18**

57. MSPGCL, in Table 59, submitted adjustments in Non Tariff Income for Rs. 218.80 Crore. MSPGCL to submit the station-wise/unit-wise reconciliation for the same in MS Excel with appropriate formulae and linkages.

<u>MSPGCL's Reply</u>:

MSPGCL submits that details of station wise adjustment in MS-Excel sheet are attached as Annexure DG-I-57.

58. MSPGCL in Table 60 has submitted the reconciliation of NTI with audited accounts. However, the Table is not complete as the reasons for various items not considered as part of NTI is not mentioned. Further, MSPGCL has mentioned that the Non-Tariff Income of Rs 7.48 Crore of HO does not pertain to regulated business. MSPGCL to submit the detailed justification as to how it does not pertain to regulated business as apart from regulated business, non-regulated business of MSPGCL is Solar business. MSPGCL to substantiate with supporting documents that this entire Non-Tariff Income pertains to Solar business. Further this entire Table 60 is not in accordance with the reconciliation statement submitted as part of reconciliation of accounts between Regulated Business and Un-Regulated Business. MSPGCL to revise this Table 60 accordingly.

<u>MSPGCL's Reply</u>:

MSPGCL submits that the "Not pertain to regulated business" remark is actually against expenses of Rs 0.12 Crore. However, it was inadvertently shown against the element of 'HO' of Rs.7.48 Crore. Hence, it is to submit that in table 60, Rs.7.48 Crore is considered as non-tariff income. Hence, the reconciliation statement will not change. The revised table correcting the aforementioned changes is as under:

Particulars	As per Accounts	Claimed in True up	Remark
Other operating revenues			
Gain on sale of Fixed assets	-1.36	-1.36	
Gain on sale of Fixed assets of BSL created through Ash Fund	2.90	-	Since assets were created through Ash fund, it is excluded from NTI claim
Late payment surcharge	3,949.25	-	Not considered under NTI as per Regulation 37.3 of MERC (MYT) Regulations 2019
Sale of Rejected Coal	117.88	-	Adjuted against fuel cost.
IPP Sale of Coal	116.40	-	Related to Case IV. Hence, not claimed
Total (A)	**4,185.07**	**-1.36**	
Other Income			
sale of scrap	31.44	31.44	
Rental from contractors & staff Quarters	4.11	4.11	
Other Misc Income	4.97	4.82	Rs.0.15 Cr is pertaining to Solar Business, hence not included
Loss on obsolescence of stores	10.12	-	Since it is provision, excluded from NTI claim
Income of LD recovery (Koradi)	-	4.78	
Income of LD recovery adjusted in Wash Coal Cost	93.39	-	Adjusted against fuel cost. Hence not considered
Income of LD recovery adjusted in R&M	12.32	-	Adjusted against R&M cost. Hence not considered
Credit Balances Written Back	86.25	-	It's a provision, hence not considered
Aptel	0.12	-	Not pertain to regulated business
HO	7.48	7.48	
Total (B)	**250.19**	**52.63**	
Energy and demand charges of Supply of electricity to the housing colonies of its operating staff and supply of electricity for construction works at generating Station (Booked under Sale of Power) **(C)**	10.27	10.27	
Grand Total (A+B+C)	**4,445.53**	**61.53**	

59. MSPGCL, in Table 67 of the Petition, submitted expenses for CMAg projects to the tune of Rs. 4.98 Crore for FY 2022-23 along with the Auditor Certificate substantiating the same. MSPGCL to submit relevant documentary evidence substantiating the such expenses.

<u>MSPGCL's Reply</u>:

It is submitted that the Auditors certificate substantiating the CMAg expenses claimed of Rs.4.98 Crore is attached as Annexure 19 to the original Petition. The said Auditors certificate along with supporting documents are attached as Annexure DG-I-59 & 85 to these replies of data gap set I for ready reference of the Hon'ble Commission.

60. MSPGCL, in para 7.6.2.17, of the Petition, submitted an amount of Rs. 189.47 Crore deducted by MSEDCL in FY 2017-18 and FY 2018-19 be recovered from end consumers. MSPGCL to submit the relevant documentary evidence substantiating the same along with the detailed justification for claiming the same in ARR.

MSPGCL's Reply:

As submitted under the Para 7.6.2.17 of the present petition, MSEDCL has carried out unilateral deduction of Rs. 189.47 Crs. from the AFC and Lease rent billed by MSPGCL for Ghatghar PSS for FY 2017-18 & FY 2018-19. The year-wise deductions communicated by MSEDCL, vide letter dated 11.03.2019, are as tabulated below:

Amount deducted by MSEDCL for Ghatghar (As per MSEDCL letter dated 11.03.2019) Rs. Crs.			
Financial Year	**LR**	**AFC**	**Total adjusted**
FY 2017-18	88.79	8.57	97.36
FY 2018-19	79.02	13.09	92.11
Total	**167.81**	**21.66**	**189.47**

MSPGCL, vide letter dated 04.05.2019, has provided detailed reasons for the outages at Ghatghar PSS and has explained that the events were un-controllable in nature for MSPGCL due to reasons like uniqueness in equipment, being first PSS in India of such type; non-availability of service / spares support from OEM, critical damage to generator equipment during the flooding events etc.

It was also pointed out to MSEDCL that MSEDCL's action of deducting O&M charges and lease rent for the Ghatghar PSS is in violation of the terms outlined in the Power Purchase Agreement (PPA) and constitutes a unilateral action. According to Clause 7.2.4 of the PPA, MSEDCL is obligated to pay 95% of the bill amount regardless of any dispute concerning any portion of the bill.

However, MSEDCL has continued with its stand for deduction of billed amount and has not paid the amount to MSPGCL.

In the petition filed before Hon'ble Commission for truing-up of FY 2017-18 & FY 2018-19 (MERC Case No. 296 of 2019), in the total revenue amount, MSPGCL had included the billing amount for Ghatghar (AFC as well as Lease rent) as a part of revenue for SHPs. The details for the same were submitted under the Form 9.1 of the petition formats.

Similarly, in the petition filed before Hon'ble Commission for truing-up of FY 2017-18 & FY 2018-19 (MERC Case No. 322 of 2019), MSEDCL had submitted the costs towards power purchase from MSPGCL Hydro stations under the Power purchase details submitted in Form 2 of the petition. The following is comparison for the Revenue claimed by MSPGCL vis-à-vis the power purchase cost claimed by MSEDCL for the Hydro stations for FY 2017-18 & FY 2018-19.

FY 17-18	Hydro billing Rs. Crs.				
	Fixed	**Variable**	**Total Energy billing**	**Other (Lease rent)**	**Total**
MSPGCL's Submission Regarding Revenue billed in Form 9.1 for Hydro Stations in Case No. 296 of 2019	111.30	61.5	172.8	514.5	687.3
	Power purchase cost Rs. Crs.				
	Fixed	Variable		Other	Total
Power purchase cost claimed by MSEDCL in Form 2 in Case No. 322 of 2019	582.22	111.12		0.0	693.34
FY 18-19	Hydro billing Rs. Crs.				
	Fixed	Variable	Total Energy billing	Other	Total
MSPGCL's Submission Regarding Revenue billed in Form 9.1 for Hydro Stations in Case No. 296 of 2019	143.4	58.3	201.7	503.2	704.90
	Power purchase cost Rs. Crs.				
	Fixed	Variable		Other	Total
Power purchase cost claimed by MSEDCL in Form 2 in Case No. 322 of 2019	646.6	58.3		-189.47	515.4
	704.9				

The relevant worksheets from the formats submitted by MSPGCL and MSEDCL for FY 2017-18 & FY 2018-19 are attached herewith as Annexure DG-I-060 to these replies of data gap set I.

It can be seen that for FY 2018-19, the Revenue from Hydro stations was submitted by MSPGCL was Rs. 704.90 Core. whereas the power purchase cost submitted by MSEDCL for MSPGCL hydro power Rs. 515.4 Core. (= Rs. 646.6 Crs + Rs. 58.3 Crs. – Rs. 189.47 Crs.). It was not explicitly mentioned in the petition by MSEDCL that Rs. 189.47 Crs. are reduced from power purchase cost for MSPGCL Hydro stations on account of issue related to Ghatghar PSS. However, the deductions shown is for the same amount of Rs. 189.47 Crs. and apart from the Ghatghar issue, there was no other dispute / deduction communicated by MSEDCL to MSPGCL for this concerned period (FY 2017-18 & FY 2018-19).

Further, while approving the truing-up for MSPGCL for FY 2017-18 & FY 2018-19 under the order dated 31.03.2020 in Case No. 296 of 2019, the Hon'ble Commission had considered the Revenue from sale of power as submitted by MSPGCL. (Please refer tables 3.72, 3.73 , 3.74 , 3.75 , 3.76 & 3.77 of the order in Case No. 296 of 2019) .

Similarly, in case of MSEDCL, under the order dated 31.03.2020 in Case No. 322 of 2019, the Hon'ble Commission has approved the power purchase cost for FY 2-17-18 & FY 2018-19 as submitted by MSEDCL. (Please refer tables 4.32 and 4.33 of the order in Case No. 322 of 2019).

Thus, MSEDCL had unilaterally carried out under-declared the power purchase cost as against the bills claimed by MSPGCL and as the same was considered for truing up for MSEDCL, there was under-recovery of power purchase cost to the extent of Rs. 189.47 Crs. from the end consumers.

It is further to clarify that the Petitioner is not raising any new or additional claim in its ARR on account of this anomaly created by MSEDCL. The Petitioner is requesting to allow recovery of the erroneous unilateral deduction amount to MSEDCL under its true-up claim and pass on the amount to MSPGCL, being a legitimate claim of MSPGCL.

In view of this, the Petitioner has requested to issue directives to MSEDCL to recover this amount from its end consumers and to make the payment to the Petitioner through para 7.6.2.17 of the present Petition.

The documentary evidence, in the form of bills raised to MSEDCL in support of the claim, is attached as Annexure-DG-I-60 to these replies to the data gap.

Additionally, it is submitted that MSEDCL has not provided any document specifying the payment amount and the corresponding claim against which the payment is made. However, MSEDCL has communicated that they are not paying an amount of ₹189 crore. This is reflected in the reconciliation document titled "MSEDCL Reco 2020-21," which is shared herewith under Annexure-DG-I-60. Specifically, on Page 14 of the PDF, the amount of ₹189 crore is mentioned as "Ghatghar Recovery."

61. MSPGCL, in para 7.6.3.20 of the Petition, submitted an amount of Rs. 328.67 Crore disallowances faced due to non-availability of 0.2S class CTs due to MSETCL for Koradi Units 8-10 from FY 2015-16 to FY 2023-24. MSPGCL to submit the detailed calculation of the same in MS Excel with appropriate formulae and linkages.

MSPGCL's Reply:

The detailed calculation of disallowances faced due to non-availability of 0.2S class CTs due to MSETCL for Koradi Units 8-10 from FY 2015-16 to FY 2023-24 is attached as Annexure DG-I-061 to these replies of data gap set - I.

III. True-up for FY 2023-24

62. MSPGCL to submit the copies of fuel bills for the months of April, July, October 2023 and January 2024 clearly segregating the same for each Station/Unit.

MSPGCL's Reply:

The copies of fuel bills as sought above are attached as Annexure DG-I-62 to the replies of data gap set I.

63. MSPGCL, in Table 72 of the Petition, submitted the Availability and PLF for all its Stations for FY 2023-24. MSPGCL also submitted the SLDC certificates for actual Availability and PLF for FY 2023-24. It has been observed that the SLDC certificates does not include the actual overall Availability and PLF for each Station/Unit for the year as submitted in Table 72. MSPGCL to submit the certification of SLDC for the actual overall Availability and PLF as submitted in Table 72.

MSPGCL's Reply:

It is submitted that as per Regulation 50.1 of MERC (MYT) Regulations 2019, capacity charges shall be recovered under two segment of the year, i.e., High Demand Season (period of three months) and Low Demand Season (period of remaining nine months), SLDC certifies availability and within each season in two parts, viz., Capacity Charge for Peak Hours of the month and Capacity Charge for Off-Peak Hours of the month. Accordingly, SLDC has been certifying availability based on the data submitted by the Petitioner for pr-rata recovery of AFC. In Table 72 of the Petition, availability specified for High demand and low demand season (in peak and off peak hours) may be verified from the average availability for high and low demand season certified in SLDC certificate. Further, the Petitioner submits that the total availability and PLF specified in the table 31 of the Petition is weighted average of availability and PLF mentioned for high and low demand season into peak and off peak hours.

The excel working for computation of annual PLF and AVF based on the peak / off peak period AVF in HDS / LDS is enclosed as **Annexure DG-I-63** .

64. MSPGCL, in para 8.1.1 of the Petition, submitted key reasons for low Availability of its Stations in FY 2023-24. MSPGCL to submit the generation loss for each Station (old and new separately) on account of each reason.

MSPGCL's Reply:

The reason wise loss in % Availability factor for FY 2023-24 on account of each major reason for each station is as tabulated below.

STATION	HIGH DEMAND SEASON		LOW DEMAND SEASON		Reasons for deviation
	Peak AVF	Off Peak AVF	Peak AVF	Off Peak AVF	
BHUSAWAL (Unit 3)	78.91%	79.52%	56.25%	56.26%	**HDS** : Poor coal quality (9.90 %) **LDS** : Poor coal quality (8.21 %),Wet coal problems (2.65%),Boiler tube elakage (2.58% %),Condenser vacuum/CWP problem(6.83%),Seal oil system(5.29%)
BHUSAWAL (Unit 4-5)	79.59%	77.73%	82.61%	82.08%	**HDS** : Poor coal quality (3.97 %),Boiler tube leakage (11.68%) **LDS** : Poor coal quality (4.00 %),Wet coal problems (1.60%)
KHAPARKHEDA (Unit 1- 4)	73.65%	73.70%	63.08%	62.75%	**HDS** : Poor coal quality (10.99 %),Boiler tube leakage (1.11 %), Clinker formation (3.49%) **LDS** : Poor coal quality (9.06%),Wet coal problems (1.47%),Boiler tube leakage (2.02 %), Coal cycle problem(3.26%),Clinker formation (2.88%).Air heater (3.54%)
KHAPARKHEDA U # 5	82.24%	83.03%	84.82%	83.81%	**HDS** : Poor coal quality (3.91 %) **LDS** : Poor coal quality (4.63 %),Wet coal problems (1.62%)
NASHIK (Unit 3-5)	83.00%	83.53%	80.66%	80.41%	AVF achieved in HDS and LDS
CHANDRAPUR (Unit 3-7)	75.63%	74.98%	51.03%	51.33%	**HDS** : Poor coal quality (6.51 %),Boiler tube leakage (2.58 %) **LDS** : Poor coal quality (5.31 %),Wet coal problems (3.58%),Boiler tube leakage (4.25%).Fan problems (3.14%),Air heaters (5.12%),Turbine side problem(2.23%)
CHANDRAPUR (Unit- 8 & 9)	86.86%	86.36%	86.35%	85.76%	AVF achieved in HDS and LDS
PARAS (Unit 3- 4)	86.36%	86.48%	82.33%	81.82%	HDS : AVF achieved . LDS : Poor coal quality (8.38%)
PARALI (UNIT 6-7)	86.99%	86.75%	89.96%	90.38%	AVF achieved both in HDS and LDS
PARALI (UNIT 8)	77.10%	78.32%	72.75%	73.07%	**HDS :** Boiler tube elakage (1.35%%),Coal cycle problems (7.97%) **LDS** : Poor coal quality (2.79 %), coal cycle problems (8.82%),Boiler tube leakage (0.91%)
KORADI (Unit 6)	77.28%	76.85%	74.88%	75.08%	AVF achieved both in HDS and LDS
KORADI (Unit- 8, 9 & 10)	66.44%	65.73%	69.64%	69.20%	**HDS :** Poor coal quality (6.47%),Boiler tube elakage(19.22%) **LDS** : Poor coal quality (8.55%, Wet Coal problem (1.23 %),Boiler Tube Leakage (7.98 %)
GTPS URAN (Unit 5 - 10)	35.09%	36.93%	33.67%	34.32%	The annual average gas availability to GTPS Uran for the year 2023-24 was 1.31 MMCMD against the contracted quantity of 3.5 MMCMD.

The reason wise and station wise generation loss is attached as Annexure DG-I-64 to these replies of data gaps.

65. The Commission, in the Order dated 8 March, 2022 in Case No. 133 of 2021, approved the normative SHR of 2350 kcal/kWh for Koradi Unit 6, as proposed by MSPGCL. Whereas, in the present Petition, MSPGCL has claimed the SHR of 2456 kcal/kWh for Koradi Unit 6. MSPGCL to submit the justification for seeking revision of the SHR of Koradi Unit 6.

MSPGCL's Reply:

This data gap is similar to that of Data Gap 37. Therefore, the reply provided for Data Gap 37 may be referred to as response to this data gap.

66. MSPGCL, in para 8.1.2 of the Petition, submitted key reasons for high SHR of its Stations in FY 2023-24. MSPGCL to submit the increase in fuel cost for each Station (old and new separately) on account of each reason.

MSPGCL's Reply:

MSPGCL respectfully submits that the major factors contributing to the deviation in Station Heat Rate for FY 2023-24 are tabulated below.

STATION	Actual	Reasons for deviation
BHUSAWAL (Unit 3)	2906	1) Partial loading + Low PLF and Poor Coal Quality & Wet coal. (Actual Coal CV 3042 , Design CV 5000 Kcal/kg) 2) Excess oil consumption, 20 times start-up out of this 4 times cold start-up. 3) Due for overhaul since 2016
BHUSAWAL (Unit 4-5)	2449	Average Bunkered Coal GCV was 3114 kcal/kg against desgin Coal 3400 kcal/kg. Excess Oil consumption for flame stabilty due to Wet and Lumpy coal.Partial loading due to Poor coal quality,LDBD etc
KHAPARKHEDA (Unit 1- 4)	2740	Partial loadability ,Low PLF and high oil consumption
KHAPARKHEDA U # 5	2451	Partial loadability ,Low PLF and high oil consumption
NASHIK (Unit 3-5)	2761	Marginally more than normative due to partial loading and high oil consumption
CHANDRAPUR (Unit 3-7)	2711	Low PLF/Partial loadability and more oil consumption
CHANDRAPUR (Unit- 8 & 9)	2374	Norm achieved
PARAS (Unit 3- 4)	2425	Less than normative value
PARALI (UNIT 6-7)	2463	Low PLF/Partial loadability and more oil consumption
PARALI (UNIT 8)	2448	Low PLF/Partial loadability and more oil consumption
KORADI (Unit 6)	2514	Less than normative value
KORADI (Unit- 8, 9 & 10)	2402	Heat Rate is on higher side due to partial loading on account of Poor Coal Quality, Wet Coal Problem, CHP Problems, BTL, LDBD, PA Fan, HP Heaters, Condenser Vaccum etc. and more number of forced outages. Also Coal GCV is less as compared to Design GCV due to which loadability was less and higher Heat Rate.
GTPS URAN (Open cycle)	3345	GT-5&6 were on open cycle mode throughout the year and GT7&8 were also in open cycle mode from 24.06.2023 to 28.08.2023 . There was no continuous schedule to these open cycle units due to the high MOD rate and these units were synchronized/withdrawn according to the demand of LD Kalwa and also considering the actual gas availability. Due to these factors there were increased synchronization/withdrawals which resulted in high heat rate. Also, the gas turbines of GTPS Uran are 39 years old and Steam turbines are 30 years old. As the useful life of the plant has been passed by, the heat rate norms may not be achievable.
GTPS URAN (Combine cycle))	2090	As above

The reason-wise impact on SFOC in ml/kWh and corresponding increase in fuel cost in Rs. Crs. as well as in Rs./kWh , on approximate basis, are as per attached Annexure DG-I-39,67.

67. MSPGCL, in para 8.1.3 of the Petition, submitted key reasons for high SFOC of its Stations in FY 2023-24. MSPGCL to submit the increase in fuel cost (in Rs. Crore and in Rs/kWh) for each Station (old and new separately) on account of each reason.

<u>MSPGCL's Reply</u>:

MSPGCL respectfully submits that the major factors contributing to the deviation in secondary fuel oil consumption (SFOC) for FY 2023-24 are tabulated below. However, it is typically the result of multiple root causes operating concurrently, and it is only in rare instances that a single specific cause is solely responsible. Consequently, it is difficult to quantify the exact loss of generation attributable to each individual factor.

STATION	Norm	Actual	Reasons for deviation
BHUSAWAL (Unit 3)	1.400	3.608	For stability of unit and to avoid unnecessary tripping due to Poor Coal Quality (flame stability) & Wet coal problem + 20 times start-up out of this 4 times cold start-up.
BHUSAWAL (Unit 4-5)	0.500	0.979	More number of startups - Total 32 startups.2. Excess Oil consumption due to Oil support due to Flame stability & Wet coal,Oil consumption due to PA FAN Problem of U#5
KHAPARKHEDA (Unit 1- 4)	1.200	2.534	No of outages/Trippings on higher side - 68 Nos.
KHAPARKHEDA U # 5	0.500	0.348	Less than normative value
NASHIK (Unit 3-5)	1.000	1.717	Partial loading due to poor coal quality,Wet coal problems and more statrtups (47 Nos)
CHANDRAPUR (Unit 3-7)	1.000	2.006	More number of startups Excess Oil consumption due to Oil support due to Flame stability & Wet coal.
CHANDRAPUR (Unit- 8 & 9	0.500	0.287	Less than normative value
PARAS (Unit 3- 4)	0.500	0.476	Less than normative value
PARALI (UNIT 6-7)	0.500	2.074	More startups (19 Nos)
PARALI (UNIT 8)	0.500	1.219	More startups (14 Nos)
KORADI (Unit 6)	2.810	2.798	Less than normative value
KORADI (Unit- 8, 9 & 10)	0.500	0.771	Higher secondary fuel oil consumption due to more number of unit startups, wet coal problem, ID Fan Problem, Bottom Ash Evacuation problem, Clinker formation, system problem, low system demand, Flame unstability and Coal Handling Plant problems and foreign material in coal mills.

The reason-wise impact on SFOC in ml/kWh and corresponding increase in fuel cost in Rs. Crs. as well as in Rs./kWh , on approximate basis, are as per attached Annexure DG-I-39,67.

68. MSPGCL, in para 8.1.4 of the Petition, submitted key reasons for high Auxiliary Consumption of its Stations in FY 2023-24. MSPGCL to submit the generation loss for each Station (old and new separately) on account of each reason.

MSPGCL's Reply:

MSPGCL respectfully submits that the major factors contributing to the deviation in auxiliary power consumption for FY 2023-24 are tabulated below. However, it is typically the result of multiple root causes operating concurrently, and it is only in rare instances that a single specific cause is solely responsible. Consequently, it is difficult to quantify the exact loss of generation attributable to each individual factor.

STATION	Norm	Actual	Reasons for deviation
BHUSAWAL (Unit 3)	10.96%	13.35%	Partial loading & Low PLF due to LDBD, Wet Coal & Poor Coal Quality. Total 20 nos. trippings (17 Forced, 02 Planned, 01 System Problem). 4) Due for AOH since 2016.
BHUSAWAL (Unit 4-5)	6.00%	6.81%	1. Excess APC due to partial loading due to LDBD, PCQ & Wet Coal. 2. Excess APC due to high outage period (Total 35 Nos. of outages).
KHAPARKHEDA (Unit 1- 4)	9.70%	10.99%	Partial loadability (63,08%) and low PLF
KHAPARKHEDA U # 5	6.00%	6.36%	Unit is due for overhaul since long period(Last overhaul in Feb 2021)
NASHIK (Unit 3-5)	10.75%	12.55%	Partial loading/Low PLF and more outages
CHANDRAPUR (Unit 3-7)	7.80%	10.50%	Low PLF (53.6 %) with partial loadability (67.2 %.),Impact (of MDBFP running 0.26 % Impact)
CHANDRAPUR (Unit- 8 & 9)	6.00%	6.02%	Marginally higher due to MDBFP running
PARAS (Unit 3- 4)	9.30%	10.48%	1) Partial loss due to LDBD, Wet Coal, Poor Coal Quality etc. 2) Total 10 nos trippings (10 start-ups). 3) CPRI APC audit conducted in Feb 2024. As per CPRI final report Achievable value of APC for Paras TPS at 85% PLF is 10.21 % 4) FGD construction power was also included in APC.
PARALI (UNIT 6-7)	9.30%	11.48%	Low PLF/Partial loading and more startups
PARALI (UNIT 8)	8.50%	12.14%	Low PLF/Partial loading and more startups
KORADI (Unit 6)	10.81%	11.26%	APC is on higher side due to partial loading on account of Poor Coal Quality(10.86%), Wet & Sticky Coal Problem(4%), CHP Problems(2.10%), BTL(3.57%), LDBD(0.56%), No ID
KORADI (Unit- 8, 9 & 10)	6.00%	7.28%	Low PLF / partial loading on account of Poor Coal Quality, Wet Coal Problem, CHP Problems, BTL, LDBD,Condenser Vaccum etc. and Unit 10 Capital Overhaul.
GTPS URAN (Open cycle)	1.00%	2.75%	From 24.06.2023 to 28.08.2023, all gas turbine units of GTPS Uran were available in open cycle mode only. Both steam turbines were under shut down and the standby consumption of the steam turbines auxilliaries got added in the total station auxilliary power consumption. As the machine was available in open cycle only, the excess consumption of steam turbine auxiliaries incresed the open cycle Auxiliary power
GTPS URAN (Combine cycle))	3.00%	2.93%	Normative achieved

69. With regards to coal related issues faced by MSPGCL in FY 2023-24, MSPGCL to submit the details of GCV on "As Received" and "As Billed" basis from each coal source along with sample documentary evidence for substantiating such difference.

MSPGCL's Reply:

The details of GCV on "As Received" and "As Billed" basis with sample documentary evidence for substantiating such difference is attached as Annexure DG-I-69 to these replies of data gap set I.

70. MSPGCL, in para 8.1.2.3 of the Petition, submitted that the actual supply of gas for Uran was 1.31 MMSCMD against the overall requirement of 3.5 MMSCMD. MSPGCL to submit the supporting documents to substantiate the actual gas receipt in FY 2023-24.

MSPGCL's Reply:

The bills for gas received at Uran GTPS during FY 2023-24 and FY 2024-25 are attached as Annexure DG-I-70.

71. MSPGCL in para 8.2.2 submitted that revised normative fuel cost for FY 2023-24 has

been worked out considering GCV loss of 750 kCal/kg. MPSGCL to also submit the scenario of revised normative fuel cost for FY 2023-24 considering the GCV loss as approved by the Commission for FY 2023-24.

MSPGCL's Reply:

The working of normative fuel cost for FY 2023-24 considering GCV loss of 650 kCal/kg is enclosed as **Annexure DG 71.**

In light of the sub-judice matter before the Hon'ble APTEL regarding GCV variation in GCV "As billed" and "As Received", the Petitioner is revising its normative fuel cost claim in the revised Petition, considering the permissible limits of 650 kcal/kg for FY 2023-24. Consequently, the prayers in the revised Petition are also being updated accordingly.

72. MSPGCL to submit the documentary evidence of all the assets put to use during FY 2023-24 clearly segregating the same station/unit wise.

MSPGCL's Reply:

MSPGCL submits that work completion report for the assets put to use during FY 2023-24 is attached as Annexure DG-I-044 & 72 to these replies of data gap set I.

73. MSPGCL, in Table 83 of the Petition, submitted the actual water charges for FY 2023-24 as Rs. 454.03 Crore. In this regard, MSPGCL to submit the supporting documents to substantiate the actual water charges claimed for each Station/Unit.

MSPGCL's Reply:

The documentary evidence of actual water charges for FY 2023-24 are attached as Annexure -DG-I-73 to these replies of data gap set I.

74. MSPGCL, in Table 83 of the Petition, submitted the actual other charges for FY 2023-24 as Rs. 292.68 Crore. In this regard, MSPGCL to submit the details of the same alongwith supporting documents to substantiate the actual other charges for each Station/Unit.

MSPGCL's Reply:

MSPGCL submits that the certificate of chartered accountant for thermal stations is attached as Annexure DG-I-74.

75. MSPGCL, in Table 44 of the Petition, submitted the impact of pay revision for FY 2023-24 as Rs. 289.62 Crore. MSPGCL to submit the details of impact of pay revision for FY 2023-24.

MSPGCL's Reply:

Based on the pay revision circular No. 546, 548 and 549 dated 09.08.2024, the impact of pay revision has been worked out on the basis of sanctioned strength in various categories and revision in salaries for each category to Rs.289.62 Crore for FY 2023-24. Accordingly, the Petitioner has claimed the same in True up of FY 2023-24. In support of this, the Journal voucher for the accounting entry passed in the books of account for FY 2023-24 is attached as Annexure DG-I-75.

76. MSPGCL, in Table 84 of the Petition, submitted the details of the Other charges for SHP and Koyna 2023-24. These values does not match with the value submitted in Form 10 submitted along with the Petition. MSPGCL to reconcile the same and revise the claim accordingly.

MSPGCL's Reply:

MSPGCL submits that the details of the other charges for SHP and Koyna for FY 2023-24 are the same as contained in Form 10. The Other Charges in Form 10 for SHP & Koyna also contains the Lease Rent for FY 2023-24. The value of the Lease Rent included in Form 10 is as under –

Stations	Other charges (Table 84)	Hydro lease rent	Total as per form 10
SHP	0.37	230.11	230.48
Koyna	0.34	301.58	301.92

77. MSPGCL, in para 8.2.5.7 of the Petition, submitted that it has considered the normative O&M expenses for Koradi Unit 6 as two-thirds of the amount approved by the Commission for FY 2021-22 in the MTR Order, escalated for FY 2023-24, accounting for the common auxiliaries that cannot be dismantled and accordingly calculated the revised normative O&M expenses for Koradi Unit 6 for FY 2023-24. MSPGCL to submit detailed justification for such claim along with relevant documentary evidence.

MSPGCL's Reply:

This data gap is similar to data gap 50. The Petitioner has submitted the rationale for the claim of 2/3rd of O&M expenses approved for Koradi unit 6 in reply of data gap 50. Hence, the same may be referred as reply of this data gap.

78. MSPGCL, in Table 87 of the Petition, claimed IT Expenses of Rs. 42.45 Crore in addition to the normative O&M Expenses. In this regard, MSPGCL to submit the

detailed break up with justification for claim of such expenses as it is already considered under A&G expenses.

<u>MSPGCL's Reply</u>:

In the present Petition, it is submitted that IT expenses have been inadvertently claimed as Rs. 42.45 Crore instead of the correct amount of Rs. 28.89 Crore for FY 2023-24. MSPGCL submits that this correction will be incorporated in the revised Petition and tariff format. A detailed breakup of the Rs. 28.89 Crore and the justification for the utility of IT expenses are provided in Annexure DG-I-51 & 78 as part of the responses to Data Gap Set I.

As per Regulation 47.1(g), IT-related expenses are allowed over and above the normative O&M expenses. However, since IT expenses are categorized under A&G expenses in Head Office (H.O.) expenses and subsequently allocated to the stations. Consequently, since IT expenses are included within A&G expenses, they are subject to the sharing of gain and losses for O&M expense, which prevents them from being allowed at actuals over and above normative values.

In light of the above regulatory provision, which explicitly allows IT expenses over and above the normative O&M expenses, the Petitioner respectfully requests the Hon'ble Commission to approve the IT expense claim of Rs. 28.89 Crore over and above normative O&M expenses, without subjecting it to the sharing of gains or losses.

79. MSPGCL to submit the supporting documents to substantiate the actual rate of interest on long term loan claimed for each Station/Unit for FY 2023-24.

<u>MSPGCL's Reply</u>:

MSPGCL submits that PFC REC interest rate circulars are attached as Annexure DG-I-79.

80. MSPGCL, in Table 89 of the Petition, claimed the actual finance charges of Rs. 28.31 Crore. MSPGCL to submit the supporting documents to substantiate the actual finance charges claimed for each Station/Unit.

<u>MSPGCL's Reply</u>:

MSPGCL submits that supporting documents in connection finance charges of

Rs.28.31 Crore is attached as Annexure DG-53.

81. MSPGCL, in para 8.2.8.11 of the Petition, submitted loss of interest on Late Payment Surcharges of Rs. 1003.96 Crore. MSPGCL to submit the detailed calculation of the same in MS Excel with appropriate formulae and linkages.

MSPGCL's Reply:

MSPGCL submits the detailed MS-Excel computations with appropriate formulae and linkages for loss of interest on Late Payment Surcharges of Rs. 1003.96 Crore are attached in **Annexure DG-I-81** to these replies of data gap set I.

82. MSPGCL, in Table 92 of the Petition, claimed the actual interest on working capital of Rs. 1818.53 Crore. MSPGCL to submit the supporting documents to substantiate the actual interest on working capital claimed for each Station/Unit.

MSPGCL's Reply:

MSPGCL submits that relevant documents such as interest rate circulars, sanction letters are attached as Annexure DG-82.

83. MSPGCL, in Table 99, submitted adjustments in Non Tariff Income for Rs. 317.98 Crore. MSPGCL to submit the station-wise/unit-wise reconciliation for the same in MS Excel with appropriate formulae and linkages.

MSPGCL's Reply:

MSPGCL submits that the details of station wise adjustment in MS-Excel sheet is attached as Annexure DG-I-83.

84. MSPGCL, in para 8.6.1.5 of the Petition, requested to allow it to raise differential bill toward compensation charges based on the final true-up for FY 2023-24 due to actual outage period from 14 November, 2023 till June 2024, and as per the fixed charges approved under the MTR Order. MSPGCL to submit the detailed calculation of the same in MS Excel with appropriate formulae and linkages along with all the requisite documentary evidence.

MSPGCL's Reply:

The detailed calculation of differential bill toward compensation charges based on the final true-up for FY 2023-24 and provisional true up of FY 2024-25 submitted in present Petition is attached as Annexure DG-I-84 to these replies of data gap set I.

MSPGCL submits that the working submitted in aforementioned Annexure is based on the submission of the Petitioner in True up for FY 2023-24 and FY 2024-25. Hence, the Petitioner request the Hon'ble Commission to approve the differential amount based on the final True up for FY 2023-24 and provisional true up for FY 2024-25 to be approved in MYT Order.

85. MSPGCL, in Table 67 of the Petition, submitted expenses for CMAg projects to the tune of Rs. 3.21 Crore for FY 2023-24 along with the Auditor Certificate substantiating the same. MSPGCL to submit relevant documentary evidence substantiating the such expenses.

MSPGCL's Reply:

It is submitted that the Auditors certificate substantiating the CMAg expenses claimed of Rs.3.21 Crore is attached as Annexure 19 to the original Petition. The said Auditors certificate along with supporting documents are attached as Annexure DG-I-59 & 85 to these replies of data gap set I for ready reference of the Hon'ble Commission.

IV. Provisional True-up for FY 2024-25

86. MSPGCL to submit the copies of fuel bills for the months of April, July, and October 2024 clearly segregating the same for each Station Unit.

MSPGCL's Reply:

The copies of fuel bills as sought above are attached as Annexure DG-I-86 to the replies of data gap set I.

87. MSPGCL in para 10.3.1.4., submitted that the reagents for Flue Gas Desulphurization (FGD) and Selective Catalytic Reduction (SCR) systems, which are anticipated to be commissioned by September 2024, October 2024 and January 2025 for Khaperkheda Units 3-4, Koradi Unit 6 and Parli Units 6, 7 and 8 respectively, have been factored in. The cost of reagent has been computed as per norms for consumption of reagent as per Regulation 46.17 (B) MERC MYT (Second Amendment) Regulations 2023. MSPGCL to provide the assumptions for the cost of reagents with detailed computations considered along with the documentary evidence for the same.

MSPGCL's Reply:

The detailed computations along with assumptions considered are already provided in form 2.2 of tariff format provided for the respective stations along with original Petition. However, it is submitted that as per latest updates, for the following stations the expected commissioning date of the FGD/SCR is revised as shown below.

Particulars	CoD envisaged in Original petition	Revised CoD
Koradi 6	31.10.2024	30.11.2024
Parli 6, 7 and 8	31.01.2025	30.06.2025

In view of above changes in commissioning date of FGD/SCR, the necessary changes with respect to computation of reagent cost for the aforesaid stations have been made and it is being submitted through revised/updated tariff formats along with these data gap replies.

The documentary evidence for the cost of reagent along with computation of reagent cost is attached as Annexure DG-I-87.

88. As September 2024 and October 2024 are already over, MSPGCL to submit the current status of FGD and SGR commissioning at Khaperkheda Units 3-4 and Koradi Unit 6.

MSPGCL's Reply:

MSPGCL submits that commissioning of Dry Sorbent Injection (DSI) FGD system for Khaperkheda unit 3 and 4 is completed and after successful commissioning, trial operation and PG test of DSI FGD system is carried out as per contract agreement. The relevant internal documents of MSPGCL certifying or singing off the activities are attached as Annexure DG-I-088.

Regarding commissioning of Koradi unit 6, following is the current status

1)15 days Trial-run Operation of FGD (DSI) System was started on 15/Nov/24 at 1:00 PM and successfully completed on 30.11.2024.

2) PG Test shall be conducted and completed by the end of December-2024.

3) COD shall be decaled after completion of PG Test.

89. MSPGCL in Table 117 has proposed the station wise capitalization during FY 2024-25. In this regard, MSPGCL to submit the following:
    a. Station-wise Actual amount capitalized during first half of FY 2024-25 with break up of DPR works and Non-DPR works
    b. Station-wise actual physical status of various schemes proposed to be capitalized in FY 2024-25 for DPR works and Non DPR works.

MSPGCL's Reply:

The station wise actual amount capitalized during FY 2024-25 and breakup in to DPR and non-DPR works and Station-wise actual physical status of various schemes proposed to be capitalized in FY 2024-25 is provided in form 4.1 attached as Annexure DG-I-101 to these replies of data gap set I.

90. MSPGCL, in Table 118 of the Petition, submitted the workings of escalation rate for FY 2024-25. MSPGCL to submit the computations of the same in MS Excel with appropriate formulae and linkages.

MSPGCL's Reply:

It is submitted that FY 2024-25 is ongoing and monthly WPI and CPI numbers are available partly, hence the escalation rate for FY 2024-25 has been considered the same as the rate computed for FY 2023-24. The excel working of the computation of escalation rate for FY 2023-24 is provided at Annexure DG-I-31 of the replies of data gaps set I.

91. MSPGCL in Para 10.4.3.6 has mentioned that it has announced a pay revision vide circulars no. 546, 548 and 549 dated 09.08.2024. MSPGCL to provide the copy of circulars.

MSPGCL's Reply:

MSPGCL submits that the pay revision vide circular no. 546, 548 and 549 dated 09.08.2024 has already been submitted with the petition as Annexure 23. For ease of reference, the same is attached again as Annexure DG-I-91 to these replies of data gap set I.

92. MSPGCL has computed the impact of pay revision as per circular dated 09.08.2024 as Rs 302.24 Crore. MSPGCL to provide the detailed computations for the same along with the basis.

MSPGCL's Reply:

MSPGCL submits that annual impact for FY 23-24 is Rs. 289.62 Crore (details for same are provided in the reply to Data Gap point 75), and is escalated by 4.36% to arrive at estimated impact of Rs 302.24 Crore for FY 2024-25.

MSPGCL further submits that the rate of 4.36% is based on the escalation rate determined for FY 2023-24, as the WPI and CPI data for all months of FY 2024-25 are currently unavailable.

V. Revised Fuel Utilisation during the Control Period from FY 2025-26 to FY 2029-30

93. MSPGCL to submit the copies of fuel supply agreements executed for each Station/Unit.

<u>MSPGCL's Reply</u>:

The copy of FSA with coal companies are attached as Annexure DG-I-093.

94. MSPGCL to submit the details of Coal Supply Agreements for its stations in the format specified at Appendix 1.

<u>MSPGCL's Reply</u>:

The details of Coal Supply Agreements for its stations in the format specified at Appendix 1 is attached as Annexure DG-I-94. In the additional data gap, the Hon'ble Commission sought for realistic quantum realization. In this regard, it is submitted that coal realization is provided in table 141 of the Petition.

95. MSPGCL to submit the details of Gas Supply Agreements for Uran GTPS in the format specified at Appendix 2.

<u>MSPGCL's Reply</u>:

The details of Gas supply agreement for Uran GTPS is attached as Annexure DG-I-95.

96. MSPGCL to submit the details of Agreements executed for Secondary Fuel Oil for its stations in the format specified at Appendix 3.

<u>MSPGCL's Reply</u>:

The details of Agreements executed for Secondary Fuel Oil for its stations in the format specified at Appendix 3 are attached as Annexure DG-I-96.

97. MSPGCL, in Table 154 of the Petition, submitted the probable PLF based on optimistic and pessimistic cases. MSPGCL to submit the computations of the same in MS Excel with appropriate formulae and linkages along with the basis

<u>MSPGCL's Reply</u>:

It is submitted that the fully linked file submitted in the current petition represents the optimistic scenario. The optimistic and pessimistic scenario are worked out considering 100% and 85% realization of coal. The probable PLF considering optimistic and pessimistic scenario are provided below:

Scenario	Bhusawal 3	Bhusawal 4,5	Chandrapur 3-7	Chandrapur 8,9	KPKD 1-4	KPKD 5	Koradi 6,7	Koradi #8,9,10	Nashik 3-5	Parli 6,7	Parli 8	Paras 3,4	Bhusawal 6	Total Net Generation (MUs)
Optimistic	85.07%	84.67%	80.33%	85.33%	84.51%	85.09%	74.50%	84.95%	84.67%	85.20%	84.52%	84.83%	84.92%	68,791
Pessimistic	72.37%	72.01%	68.31%	72.45%	71.90%	72.66%	63.45%	72.20%	72.01%	72.45%	71.87%	72.13%	72.21%	58,499

It is further to submit that the pessimistic scenario is only shown as a representation and is not the proposed scenario for the purpose of tariff determination.

VI. Multi Year Tariff for FY 2025-26 and FY 2029-30

98. The Commission, in the Order dated 8 March, 2022 in Case No. 133 of 2021, approved the normative SHR of 2350 kcal/kWh for Koradi Unit 6, as proposed by MSPGCL. Whereas, in the present Petition, MSPGCL has claimed the SHR of 2456 kcal/kWh for Koradi Unit 6. MSPGCL to submit the justification for seeking revision of the SHR of Koradi Unit 6.

MSPGCL's Reply:

This data gap is similar to that of Data Gap 37. Therefore, the reply provided for Data Gap 37 may be referred to as response to this data gap.

99. MSPGCL, in Section 14.3.1 of the Petition, mentioned that it has considered escalation of 5% for Raw and washed coal on weighted average prices of coal for the period from October 2023 to September 2024. MSPGCL to submit station-wise and month-wise details of fuel from October 2023 to September 2024 in the format below:

Table 7: Format for submission of fuel details

Particulars	UoM	2023			2024								
		Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Opening coal stock	MT												
Quantum of Coal received													
Source 1	MT												
Source 2	MT												
……	MT												
GCV of Coal (as billed)													
Source 1	kcal/kg												
Source 2	kcal/kg												
……	kcal/kg												
GCV of Coal (as received)													
Source 1	kcal/kg												
Source 2	kcal/kg												
……	kcal/kg												
Landed Price of Coal													
Source 1	kcal/kg												
Source 2	kcal/kg												
……	kcal/kg												
Transit Loss (Coal)													
Source 1	%												
Source 2	%												
……	%												
Quantum of Coal fired													
Source 1	MT												

Particulars	UoM	2023			2024								
		Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Source 2	MT												
……	MT												
GCV of Coal (as fired)													
Source 1	kcal/kg												
Source 2	kcal/kg												
……	kcal/kg												
Quantum of secondary fuel oil fired													
LDO	kL												
……	kL												
GCV of secondary fuel oil fired													
LDO	kcal/L												
……	kcal/L												
Landed price of secondary fuel oil													
LDO	Rs./kL												
……	Rs./kL												

<u>MSPGCL's Reply</u>:

The required details in aforementioned format is attached as Annexure DG-I-99 to these replies of data gap set I.

100. MSPGCL, in Table 175 of the Petition, submitted the fuel expenses including reagents for FGD and SCR systems. MSPGCL to provide the assumptions for the cost of reagents considered along with the supporting computations and documentary evidence for the same.

<u>MSPGCL's Reply</u>:

The documentary evidence for the cost of reagent along with computation of reagent cost and breakup of Fuel cost including and reagent cost is attached as Annexure DG-I-100.

101. MSPGCL, in Table 178 of the Petition, submitted the proposed capitalisation for FY 2025-26 to FY 2029-30. MSPGCL to submit the cost-benefit analysis of each of the scheme proposed for capitalisation during FY 2025-26 to FY 2029-30.

<u>MSPGCL's Reply</u>:

MSPGCL submits that the benefits of the scheme proposed for capitalisation during FY 2025-26 to FY 2029-30 are broadly provided in the Form 4.2 submitted in tariff format along with the revised Petition. It is further to submit that detailed cost benefit analysis shall be submitted along with DPR for the requisite capital expenditure.

102. MSPGCL, in Table 179 of the Petition, submitted the proposed capitalisation for FY 2025-26 and FY 2029-30 including installation of FGD. In this regard:
   a. MSPGCL to submit the proposed capitalisation separately for FGD and other schemes.
   b. MSPGCL to submit the status of installation of FGDs in its generating stations viz., Commission's in-principle approvals, tendering, placement of work orders, physical progress till date, expected date of capitalization etc.

<u>MSPGCL's Reply</u>:

The Petitioner has submitted consolidated capital investment rolling plan for 5th MYT control period vide table 166 of the present Petition. However, it is to submit that in the total amount of capex rolling plan of Rs.25846 Crore mentioned in table 166, for some of the stations FGD capitalisation were also included. As per capex Regulations 2022, schemes of FGD capitalisation which are already approved, need not required to be included in capex rolling plan. Hence, the revised total capex rolling plan for 5th MYT control period would be of Rs.23667 Crore. The stations wise details of the capex rolling plan without FGD capitalisation and station wise capitalisation towards FGD for MYT period is attached as Annexure DG-I-102 to these replies of data gap set I. In case of any associated changes to this effect, shall be done in the revised tariff model and Petition.

103. MSPGCL, in Table 180 of the Petition, requested the Commission to allow expenses for flexible operation of coal fired generating units. In this regard:
   a. MSPGCL to submit the basis for projection of such expenses along with the documentary evidence for such assumptions.
   b. MSPGCL to submit the status of such retrofitting in its generating stations viz., Commission's in-principle approvals, tendering, placement of work orders, physical progress till date, expected date of capitalization etc.

<u>MSPGCL's Reply</u>:

The detailed submission on the aforesaid query along with the supporting is attached as Annexure DG-I-103.

104. MSPGCL, in Table 184 of the Petition, requested the Commission to allow ash transportation and infrastructure development for MSPGCL stations. In this regard:
   a. MSPGCL to submit the basis for projection of such expenses along with the documentary evidence for such assumptions.
   b. MSPGCL to submit the status of such infrastructure development in its generating stations viz., Commission's in-principle approvals, tendering, placement of work orders, physical progress till date, expected date of capitalization etc.

MSPGCL's Reply:

In view of this data gap, the Petitioner submits as under:

a) **Basis for Projection**:

   i. The working of the projected expense related to Ash utilization claimed in table 184 of the petition is enclosed as Annexure DG-I-104 to the replies of data gap set I.

   ii. It is submitted that as per Board Resolution dated 23.09.2024 (BR enclosed) MSPGCL is providing financial assistance of Rs.100/MT to Rs.125/MT for lifting and transportation of Pond Ash by rail /Road Mode from Koradi, Khaperkheda and Chandrapur TPS for road projects undertaken by Govt. agencies such as NHAI, MSRDC, PWD etc.

   iii. As per aforesaid BR, CSTPS has signed an agreement with NHAI for Road project with quantity of 42 Lakh MT. (Agreement Enclosed). KTPS is in process of signing agreement with MOIL for Mine filling with quantity of 70 Lakh MT.

   iv. Considering the available Pond ash Quantity at Koradi, Khaperkheda and Chandrapur and the financial assistance, the expense for Pond Ash utilization is projected for MYT period.

b) **Status of such infrastructure development**:

   Regarding status of such infrastructure development, it is submitted that DPR proposals for infrastructure development in its generating stations is in the process of approval.

105. MSPGCL, in Table 185 of the Petition, requested the Commission to allow IT expenses for MSPGCL stations. In this regard, MSPGCL to submit the basis for projection of such expenses along with the documentary evidence for such assumptions.

MSPGCL's Reply:

As submitted in replies of data gap 51 and 78, as per Regulation 47.1(g), IT-related expenses are allowed over and above the normative O&M expenses. In view of these regulatory provisions in MERC (MYT) Regulations 2024, the Petitioner has projected the IT expenses as per table 185 of the present Petition. The list of IT related work is provided in Annexure DG-I-105 of these replies of data gap set I. Further, utility of these IT expenses are also attached in Annexure DG-I-105 justifying the requirement of these expenses for the consideration of the Hon'ble Commission.

106. MSPGCL, in Table 206 of the Petition, submitted the provisional tariff for Bhusawal Unit 6. In this regard:

a. MSPGCL to submit the physical progress and financial progress of Bhusawal Unit 6 till date.

b. MSPGCL to submit the anticipated commissioning of the Emission Control System based on the physical and financial progress and revise the models based on the same.

MSPGCL's Reply:

a) It is submitted that physical progress of Bhusawal unit 6 till date is 97% and financial progress is 87%. Further, MSPGCL submits that unit trial operation scheduled in December 2024 and CoD is scheduled in January 2025.

b) Following is the status of commissioning of Emission Control System:

Particulars	Parameters	Status
FGD	Physical progress	71%
	Anticipated commissioning	June 2025
SCR	Physical progress	89%
	Anticipated commissioning	April 2025

Based on the above status of commissioning of FGD and SCR system, the revised tariff model of Bhusawal unit 6 is attached as Annexure DG-I-106 to these replies of data gap set I. The summary of revised tariff for the period upto FY 2029-30 is as under:

Sr. No.	Particulars	FY 2024-25 Projection	FY 2025-26 Projection	FY 2026-27 Projection	FY 2027-28 Projection	FY 2028-29 Projection	FY 2029-30 Projection
1	Capacity (Fixed) Charges (Rs. Crore)	179.71	1,208.52	1,212.93	1,193.94	1,174.88	1,155.87
2	Energy Charge Rate ex-bus (Rs./kWh)	3.51	4.26	4.41	4.57	4.74	4.91
3	Impact of Reagent Cost (Rs. kWh)	-	0.05	0.06	0.06	0.06	0.06
4=2+3	**Total Energy Charge (Rs. kWh)**	**3.51**	**4.30**	**4.47**	**4.63**	**4.80**	**4.97**

Appendix 1: Details of Coal Supply Agreements

S. No.	Station / Unit	Installed Capacity (MW)	Coal Supplier	Agreement date	Valid upto	Guaranteed Quantum per annum (MMT)	Guaranteed GCV (kcal/kWh)	Actual quantum realisation (MMT)					Actual GCV realisation on as received basis (kcal/kg)					Projected quantum realisation (MMT)					Projected GCV realisation on as received basis (kcal/kg)				
								FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	FY 2018-19	FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	FY 2018-19	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25

Appendix 2: Details of Gas Supply Agreements executed for Uran GTPS

S. No.	Installed Capacity (MW)	Gas Supplier	Agreement date	Valid upto	Guaranteed Quantum per annum (MMSCM)	Guaranteed GCV (kcal/SCM)	Actual quantum realisation (MMSCM)					Actual GCV realisation (kcal/SCM)					Projected quantum realisation (MMSCM)					Projected GCV realisation (kcal/SCM)				
							FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	FY 2018-19	FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	FY 2018-19	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25

Appendix 3: Details of Secondary Fuel Oil Agreements

S. No.	Station / Unit	Installed Capacity (MW)	Oil Supplier	Agreement date	Valid upto	Guaranteed Quantum per annum (kL)	Guaranteed GCV (kcal/ltr)	Actual quantum realisation (kL)					Actual GCV realisation (kcal/ltr.)					Projected quantum realisation (kL)					Projected GCV realisation (kcal/ltr.)				
								FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	FY 2018-19	FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	FY 2018-19	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25