SR 10-130 of 2012

BEFORE THE HONOURABLE TELANGANA STATE ELECTRICITY REGULATORY COMMISSION

Office at 5th Floor, Singareni Bhavan, Red Hills, Hyderabad - 505SERC HYDERABAI

I.A NO._____ of 2022 in O.P. No 28 of 2022

17 DEC 2022

In the matter of:

Filing of the Provisional Power Purchase True-up application for Retail Supply Business for the FY 2022-23 in accordance with the "Andhra Pradesh Electricity Regulatory Commission (Terms and Conditions for determination of Tariff for Wheeling and Retail Sale of Electricity) Regulation, 4 of 2005" and its first amendment Regulation 1 of 2014 (adopted by TSERC) thereof by the Southern Power Distribution Company of Telangana Limited ('TSSPDCL' or 'the Company' or 'the Licensee') as the Distribution and Retail Supply Licensee

In the matter of:

SOUTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED

Applicant

The Applicant respectfully submits as under: -

 Consequent to the formation of Telangana State on 02-06-2014 as per the Andhra Pradesh Reorganisation Act, 2014, a separate Telangana Electricity Regulation Commission was constituted on 03-11-2014. TSERC vide Telangana Official Gazette has issued its first regulation, Regulation No. 1 of 2014 on 10.12.2014 (Adoption of Previously Subsisting Regulations, Decisions, Directions or Orders, Licenses and Practice of Directions) wherein clause 2 states that:

"All regulations, decisions, directions or orders, all the licences and practice directions issued by the erstwhile Andhra Pradesh Electricity Regulatory Commission (Regulatory Commission for States of Andhra Pradesh and Telangana) as in existence as on the date of the constitution of the Telangana State Electricity Regulatory Commission and in force, shall mutatis-mutandis apply in relation to the stakeholders in electricity in the

- State of Telangana including the Commission and shall continue to have effect until duly altered, repealed or amended, any of Regulation by the Commission with effect from the date of notification as per Notification issued by the Government of Telangana in G.O.Ms.No.3 Energy(Budget) Department, dt.26-07-2014 constituting the Commission."
- 2. This filing is made by the SOUTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED (TSSPDCL) under Section 62(4) of the Electricity Act 2003 for determination of the provisional Power Purchase True-up for the Retail Supply Business for the period FY 2022-23 in accordance to the Andhra Pradesh Electricity Regulatory Commission (Terms and Conditions for determination of Tariff for Wheeling and Retail Sale of Electricity) Regulation, 2005" and its first amendment Regulation 1 of 2014 thereof as adopted by TSERC vide Regulation No. 1 of 2014.
- Accordingly, the Licensee in this filing submits the following Proposal of provisional Power Purchase True-ups for FY 2022-23 in accordance to APERC Regulation No. 1 of 2014 as adopted by TSERC vide Regulation No. 1 of 2014: -

4. Power Purchase True-ups:

- i. As per the directions of the Hon'ble Commission, the Licensee had submitted provisional true up cost for the FY 2016-17 as a part of additional information in the filing of ARR for Retail Supply Business for FY 2017-18. Accordingly, the Hon'ble Commission had approved the final true-up for the FY 2015-16 and provisional true-up for the FY 2016-17 in Retail Supply Tariff Order for the FY 2017-18 (Ref: Page 67-68 of the Tariff Order).
- ii. It is to further submit that the Licensee in the ARR filing for the FY 2018-19 requested the Hon'ble Commission to allow to file the provisional true-up for the FY 2017-18 & final true-up for the FY 2016-17 separately in view of high degree of uncertainty involved in estimating the truing up for FY 2017-18 due to 24 hours supply to agricultural consumers w.e.f. 01.01.2018 as well as energization of Lift Irrigation (LI) schemes.
- iii. Further, the Licensee has submitted an application to the Commission for making amendments to the Principal Regulation No. 4 of 2005 on 16.08.2017 wherein the licensee has requested the Hon'ble Commission to amend the regulation on True-up by allowing the actual agricultural sales in arriving Power Purchase cost True-

- ups so as to allow the DISCOMs to pass on the excess Power purchase cost in the ARR of Retail Supply Business.
- iv. Hence, to avoid any undue burden on the consumers, the licensees requested the Commission for filing of truing up in the ensuing year. (Ref: Pg 44 of RST for the FY 2018-19)
- v. Further to submit that the licensee has continued the same tariffs as applicable for FY 2018-19 in accordance to the Orders on continuation of Retail supply tariffs of FY 2018-19 for the FY 2019-20, FY 2020-21 and FY 2021-22 issued by the Hon'ble TSERC.
- vi. As the same tariffs of FY 2018-19 are continued for FY 2019-20, FY 2020-21 and FY 2021-22, the Aggregate Revenue Requirement approved for FY 2018-19 is continued to be applicable for FY 2019-20, FY 2020-21 and FY 2021-22.
- vii. Accordingly, the licensee has arrived at power purchase True-ups for FY 2019-20, FY 2020-21 and FY 2021-22 considering the approved power purchase cost for FY 2018-19.
- viii. The licensees have submitted ARR and FPT for Retail Supply Business for FY 2022-23 and the Hon'ble Commission has issued Tariff Order for the same vide Order dated 23.03.2022.
 - ix. In accordance to the APERC Regulation 1 of 2014 as adopted by TSERC vide Regulation 1 of 2014 dated 10.12.2014, the Licensee herewith submits the provisional Power Purchase True-up arrived for FY 2022-23 considering the actual 24x7 Agricultural consumption.

Year	Provisional Power Purchase True-up/(down) as claimed by TSSPDCL (in Rs. Crs)
FY 2022-23 (Prov.)	1270.39

5. Treatment of True-ups:

- Considering that the power purchase costs and Sales are provisional in nature, the licensees request the Hon'ble Commission to approve the power purchase true up/down for FY 2022-23 without limiting the Agricultural sales to the minimum of Approved or Actual Sales
- ii. The licensee proposes to recover the Provisional Power Purchase true up amount of Rs. 1270.39 crores from the Consumers in the form of additional ARR in the ensuing Tariff Order.
- 6. Based on the information available, the applicant has made sincere efforts to comply with the Regulation of the Hon'ble Commission and discharge its obligations to the best of its abilities. However, should any further material information become available in the near future, the applicant reserves the right to file such additional information and consequently amend/ revise the application.
- 7. This filing has been discussed and approved by the Board of Directors of TSSPDCL and Sri. CH CHAKRAPANI, Chief General Manager/RAC of TSSPDCL has been authorised to execute and file the said document. Accordingly, the current filing documents are signed and verified by, and backed by the affidavit of Sri. Ch. Chakrapani, the Chief General Manager/ RAC of TSSPDCL.
- 8. In the aforesaid facts and circumstances, the Applicant requests that this Hon'ble Commission may be pleased to:
 - a) Admit the Provisional Power Purchase True Up Petition filed by the Licensee, in accordance with Sub clause 12.5 of APERC Regulation 1 of 2014 for the FY 2021-23
 - b) Approve the Power Purchase True Up cost as submitted in the Petition in order to recover financial losses of the licensee.
 - c) Allow the impact of Power Purchase True up to be passed on, in the subsequent Tariff Orders to be issued by Hon'ble Commission
 - d) Grant suitable opportunity to TSSPDCL within a reasonable time frame to file additional material information that may be subsequently available;

- e) Consider and approve TSSPDCL's power purchase True-up application including all requested regulatory treatments in the filing;
- f) Pass such order as the Hon'ble Commission may deem fit and proper in the facts and circumstances of the case.

SOUTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED (APPLICANT)

Through

CHIEF GENERAL MANAGER RAC/TSSPDCL

Place: Hyderabad

Dated: 18-12-2022

CHIEF GENERAL MANAGER (RAC), TSSPDCL, Corporate Office, 6-1-50,

Mint Compound, Hyd-500 063

BEFORE THE HONOURABLE TELANGANA STATE ELECTRICITY REGULATORY COMMISSION

Office at 5th Floor, Singareni Bhavan, Red Hills, Hyderabad - 500 004

I.A NO._____ of 2022 in O.P. No ____ of 2022

Filing of the Provisional Power Purchase True-up application for Retail Supply
Business for the FY 2022-23 in accordance with the "Andhra Pradesh Electricity
Regulatory Commission (Terms and Conditions for determination of Tariff for
Wheeling and Retail Sale of Electricity) Regulation, 4 of 2005" and its first amendment

Regulation 1 of 2014 (adopted by TSERC) thereof by the Southern Power Distribution Company of Telangana Limited ('TSSPDCL' or 'the Company' or 'the Licensee') as

the Distribution and Retail Supply Licensee

In the matter of:

In the matter of:

SOUTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED

Applicant

AFFIDAVIT OF APPLICANT VERIFYING THE APPLICATION ACCOMPANYING FILING AS PER TERMS AND CONDITIONS OF TARIFF FOR WHEELING AND RETAIL SALE OF ELECTRICITY

I, Sri. CHILUKAMARI CHAKRAPANI, son of Sri.NARSAIAH, aged 54 years working for gain at the Southern Power Distribution Company of Telangana Limited do solemnly affirm and say as follows:

I am the Chief General Manager/RAC of TSSPDCL, the Licensee that has, vide the Hon'ble Commission's approval in proceedings No. APERC/Secy/Engg/No.6 dt.31.3.2000, been granted the distribution and retail supply functions that Transco was authorised to conduct or carry out under the Act and the license, with respect to the business of distribution and retail supply of electricity in the Southern distribution zone in Telangana. On December 27, 2000, the Hon'ble Commission has awarded a Distribution and Retail Supply Licence to TSSPDCL effected from April 1, 2001.

- 2 I am competent and duly authorised by TSSPDCL to affirm, swear, execute and file this affidavit in the present proceedings.
- As such, I submit that I have been duly authorised by the Board of Directors of TSSPDCL to submit the true-up application, as per Terms and Conditions of Tariff for Wheeling and Retail Sale of Electricity (Regulation 4 of 2005) of TSSPDCL for the FY 2022-23 to Hon'ble Commission.
- 4 I submit that I have read and understood the contents of the appended application of TSSPDCL. The facts stated in the application are true to the best of my knowledge, which are derived from the official records made available and certain facts stated are based on information and advice which, I believe to be true and correct.
- 5 I submit that for the reasons, and facts stated in the appended application this Applicant pray that the Hon'ble Commission may be pleased to:
 - Admit the Provisional Power Purchase True Up Petition filed by the Licensee
 - Approve the Provisional Power Purchase True Up cost as submitted in the Petition in order to recover financial losses of the licensee.
 - Allow the impact of Power Purchase True up to be passed on to the consumers
 - Grant suitable opportunity to TSSPDCL within a reasonable time frame to file additional material information that may be subsequently available;
 - Consider and approve TSSPDCL's power purchase True-up application including all requested regulatory treatments in the filing;
 - Pass such order as the Hon'ble Commission may deem fit and proper in the facts and circumstances of the case.

CHIEF GENERAL MANAGER (RAC), TSSPDCL, Corporate Office, 6-1-50, Mint Compound, Hyd-500 063

VERIFICATION:

I, the above named Deponent solemnly affirm at Hyderabad on this 16 Day of December 2022 that the contents of the above affidavit are true to my knowledge, no part of it is false and nothing material has been concealed there from.

V. Anil Kumal.
Solemnly affirmed and signed before me.

V. ANIL KUMAR
COMPANY SECRETARY
TSSPDCL, Corporate Office & Registered Office
6-1-50, Mint Compound,
HYDERABAD-500 063. T.S.

CHIEF GENERAL MANAGER (RAC), TSSPDCL, Corporate Office, 6-1-50, Mint Compound, Hyd-500 062

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1 Power Purchase True-ups

1.1 Introduction

Regulatory Provisions:

Sub clause 12.5 of APERC Regulation 1 of 2014 stipulates as follows:

"12.5 True-up for Retail Supply Business

- a. The Distribution Licensee shall include the power purchase cost variation over the previous year Power Purchase cost in the Tariff Order as expense (in the event of incurring excess cost)/rebate (in case of cost saving) in the ARR as special item with relevant details. To arrive the power purchase cost variation, the least of the following power purchase quantity is to be considered:
 - i) Actual power purchase quantity procured by the Discoms for its consumers.
 - ii) Power purchase quantity computed based on actual sales except LT Agriculture sales. LT Agricultural sales will be limited to Tariff Order quantity. These aggregated sales will be grossed up with approved losses for the relevant year in the MYT orders.
- b. Since the complete information of cost actually incurred relating to previous year will not be available at the time of filing of ARR for a particular tariff year, the Licensee may include provisional cost variation for the previous year in ARR filings which will be subject to final correction by the Commission as and when final accounts for that year become available.
- c. The Licensees shall also include in the ARR the amounts to be collected on final basis being the difference between the cost incurred based on audited annual accounts report and costs provisionally approved by the Commission in the Tariff Order for the year immediately preceding the previous year."

As per the Regulation, the Licensee is now filing the provisional Power Purchase True up for FY 2022-23.

It is to submit that the Licensees in the ARR filing for the FY 2018-19 requested the Hon'ble Commission to allow to file the provisional true-up for the FY 2017-18 &

final true-up for the FY 2016-17 separately in view of high degree of uncertainty involved in estimating the truing up for FY 2017-18 due to 24 hours supply to agricultural consumers w.e.f. 01.01.2018 as well as energization of Lift Irrigation (LI) schemes.

Further, the Licensee has submitted an application to the Commission for making amendments to the Principal Regulation No. 4 of 2005 on 16.08.2017 wherein the licensee has requested the Hon'ble Commission to amend the regulation on True-up by allowing the actual agricultural sales in arriving Power Purchase cost True-ups so as to allow the DISCOMs to pass on the excess Power purchase cost in the ARR of Retail Supply Business. The matter was still under consideration by the Hon'ble Commission at that juncture.

Hence, to avoid any undue burden on the consumers, the licensees requested the Commission for filing of truing up in the ensuing year. (Ref: Pg 44 of RST for the FY 2018-19).

Eventually, the licensee has submitted the petition for ARR for Retail Supply Business for FY2019-20, FY2020-21 and FY2021-22 before the Hon'ble Commission dated 31.03.2021 with a request to condone the delay in filing the aforementioned petition within the stipulated timeline due to certain unavoidable situations that are beyond the control limit of the licensee viz., enforcement of Model Code of Conduct in view of elections to the Parliament, State Legislature, local bodies; non-operational of the Hon'ble commission for a certain period and further imposition of lockdown in the country in view of outbreak of pandemic COVID-19.

It is pertinent to mention that, the licensee has once again filed the petition for Amendment of Regulation No. 4 of 2005 on 30.09.2019 requesting the Hon'ble Commission proposing certain additions to the uncontrollable items in the ARR and modifications to the existing uncontrollable items viz., considering actual Agriculture Sales, actual T&D losses etc., for passing through the gains or losses of the licensees to cope up with the present day situations.

In view of the aforementioned proposals, the licensee could not file the power purchase true-ups for FY2016-17 to FY2020-21 along with the filings of ARR for Retail Supply Business of the licensee for FY2019-20 to FY2021-22 dated 31.03.2021.

Eventually, the Hon'ble Commission dismissed the petition vide order in O.P.(S.R.) No.33 of 2019 dated 02.06.2021 stating that the regulation which is termed as subordinate or delegated legislation, cannot be amended or varied by invoking power either through the adjudicatory proceedings or inherent rule making power at the instance of any of the stakeholders and further opined that the submissions of the TSDISCOMs would be treated as suggestion/input as and when the Commission initiates the process of adding to or amending or varying regulation.

The licensees have submitted ARR and FPT for Retail Supply Business for FY 2022-23 and the Hon'ble Commission has issued Tariff Order for the same vide Order dated 23.03.2022.

The Licenseehereby submits the provisional power purchase true-up for FY 2022-23 calculated considering the Actual Agriculture sales and power purchase cost incurred for H1 FY 2022-23 and estimated sales and estimated power purchase cost for H2 FY 2022-23.

Considering that the power purchase costs and Sales are provisional in nature, the licensees requests the Hon'ble Commission to approve the same without limiting the Agricultural sales to the minimum of Approved or Actual Sales. A summary of Power PurchaseTrue up/(down)claimed by TSSPDCL, in this Petition is provided in the table below:

Year	Power Purchase True- up/(down) of TSSPDCL (in Rs. Crs)
FY 2022-23 (Prov.)	1270.39

The Licensees in the state of Telangana purchase power from TSGENCO generating thermal and hydro stations, Central generating stations and other sources such as, Solar and other RE sources, IPPs, viz. Singareni, Thermal Power Tech and CSPDCL, and short-term sources to meet the energy requirement of the State.

1.2 Provisional Power Purchase True up for the FY 2022-23 at the State level

- The licensees have considered the approved power purchase cost, SLDC and transmission cost for FY2022-23 in the RST Order for arriving at the provisional Trueup for FY2022-23.
- Further, the Licensees had started supplying 24hrs power to all agricultural consumers w.e.f. date January 1, 2018.

 The Petitioners submit that based on actuals for first half and the estimates for the second half of FY2022-23and approved distribution losses, power purchase cost (including transmission charges) arrives at a provisional cost of Rs.29,430 Cr for TSSPDCL and Rs 11,636 Cr. for TSNPDCL, aggregating to Rs. 41,066 Cr for the Telangana for FY 2022-23 as shown in the table below.

The Rolling		P	P cost V	ariation	Analysis	TSDISC	OMS FY	23	Brain.	X = 1	
Category	Energy Dispatched		Fixed cost		Variable cost		Othe	r Cost	Total	mpact	
	Appr.	Act.	Appr.	Act.	Appr.	Act.	Appr.	Act.	Appr.	Act.	Diff.
Genco Thermal	26907	24664	5212	4117	7059	7152	-		12271	11268	-1003
Genco Hydel	3719	5443	1331	1331	0	0	=	II Crested	1331	1331	0
CGS	20089	16856	2112	2156	5746	5862	-		7858	8018	160
APGPCL and IPPS Gas	0	0	0	0	0	0			0	0	- O
NCE	7699	8798	0	5-4	4277	4362	-	454	4277	4362	85
Others	22748	15506	4414	3556	4580	4230	=	51	8994	7837	-1157
Market	2172	4481	-	01	716	2948	-	0	716	2948	2232
Interstate Sale/UI/Sale/P urchase in 33kV & below	-5060	-1674	= :)T	-1619	-1141	. =	e-rai duction	-1619	-1141	478
D-D	_	0	- 2	Mr. 10	-	0	=		-	0	0
Interest on pension bonds	_	i _{a is} s	1307	1307	-		-		1307	1307	0
Miscellaneous				(i)		LIC MARKET			0	105	105
Total	78274	74075	14376	12467	20759	23413	0	155	35153	36035	901.29

1.2.1 Reasons for deviation in Power Purchase Quantum and Cost for the State:

The actual energy dispatched by the State is 5% lower for FY2022-23, however is 6% higher than previous year and is following a similar trend of the previous years viz., FY 2019-20, FY2020-21& FY 2021-22. The reduction in dispatch is due to the lower sales recorded in H1 FY 2022-23 especially in HT IV LIS category. The detailed explanation for the same is presented below:

i) Deviations in Energy Dispatch:

 Hydel Power: The State of Telangana is witnessed significantly higher rainfall levels, across the state during the H1 of FY 2022-23. As the recorded rainfall was high, a quantum amounting to 5443 MUs is expected to be generated from hydel power stations during the year.

- The actual hydel generation, thus achieved for the FY 2022-23, is 46% higher than the energy dispatch as approved by the Hon'ble Commission, which stands at 3,719 MUs
- Central Generating Stations (CGS): There is slightly lower dispatch
 expected from NTPC stations as compared to approved dispatch. This will
 lead to the decrease in energy received from CGS stations by 3233 MUs
 (16% decrease) from the approved energy dispatch by the Hon'ble
 Commission.

State GENCO - (Thermal):

There is slightly lower dispatch expected from GENCO thermal stations as compared to approved dispatch.24664 MUs are expected to be procured from TSGENCO Thermal stations during the FY 2022-23, which is 8% lower than the approved dispatch by the Hon'ble Commission.

Non-Conventional Energy Sources (NCES):

- The Licensees are committed to procure clean and sustainable energy sources to meet the Renewable energy obligation requirement.
- In accordance with the same, incremental energy is expected to be procured from NCE sources to meet the demand of the state. The Licensees are expected to procure an additional 1,099 MUs from the NCES sources in FY 2022-23, amounting to a total of 8,798 MUs as against 7,699 MUs approved by the Hon'ble Commission.

Short term power sources:

- o It is Pertinent to mention that the state of Telangana has started supplying 24 * 7 power to agricultural sector from January 1, 2018. This has increased the power purchase requirement for the whole FY 2022-23.
- The Licensees, after exhausting all their sources, will resort to procure power from short term market for the FY 2022-23.

- The Licensees submit that the power will be procured to meet the sudden increase in power demand in the state for the FY 2022-23.
- To meet the power demand, the Licensees are expected to purchase a total of 4,481 MUs from the Short-term market for the State of Telangana for the FY 2022-23. An additional 2,309 MUs are expected to be purchased in addition to Commission's approval which stands at 2,172MUs.
- The Licensees submit that they would be making enormous effort to procure power from long term sources.
- In this context, the Licensees humbly requests the Hon'ble Commission to allow the Short-term power purchase quantum for the FY 2022-23.
- ii) Deviations in Power Purchase Cost: The deviations in power purchase cost is further classified into two categories (fixed cost and variable cost) and is discussed below in detail:
 - Variations in Fixed Cost (FC): It is estimated that there would be an overall change in the fixed costs from the approved Rs. 14,376 Cr. to estimated Rs. 12,467 Cr. (13% decrease from approved value) incurred by the Licensees during the FY 2022-23.
 - Variations in Variable cost (VC): Variable Costs is estimated to increase to
 the tune of Rs. 2,650 Cr, from the approved costs. The reason for such
 increase can be mostly attributed to the increase in per unit VC of TSGENCO&
 CGS Thermal power stations, NCEs and procurement from Short term market
 to meet the 24 * 7 power supply initiative to the agricultural consumers in the
 state. The details have been further explained below:
 - o For Thermal Stations (TSGENCO Thermal power stations, CGS, Singareni, Thermal Power Tech) at the time of issuance of order, the cost assumptions considered by the Hon'ble Commission were provisional, but due to increase in cost of Coal, Freight, Royalty and levy of Green CESS, the variable cost of thermal stations has increased. While TSGENCO recovers the deviation in actual variable cost on a quarterly basis from the licensees, the same is not passed on to the consumers by the DISCOMS.
 - TSGENCO Thermal Stations: The variable costs of the TSGENCO stations are expected to increase by 11% from the approved Rs 2.62/kWh to Rs.

- 2.90/kWh. With the increase in power procurement from these stations, the overall Variable cost is expected to increase to an extent of Rs. 93 Cr for the FY 2022-23.
- CGS Stations: The Variable cost is expected to increase significantly by 22% from the approved costs by the Hon'ble Commission (from Rs. 2.86/kWh to Rs. 3.48/kWh).
- O IPP (Thermal Power Tech): For IPP Thermal Powertech increase in purchase cost is expected due to the increase in domestic coal prices, freight charges and forex rate variations on the imported coal component. The Variable cost is expected to increase by 19% from the approved costs by the Hon'ble Commission (from Rs. 2.30/kWh to Rs. 2.73/kWh).
- The dispatch from NCEs, being the must-run stations is expected at a lower per unit cost of Rs.4.96/kWh from an approved cost of Rs.5.56/kWh while the dispatch quantum is expected to exceed the approved quantum, the overall cost will also increase in for the licensees to the tune of Rs. 85 Cr.
- Short-Term Power: As explained in the earlier sections, the Licensees is expected to source additional power requirement for the state by procuring power from short term sources. This will increase the power purchase costs of the Licensees by Rs. 2232 Cr
- The actual quantum and revenue of sale of surplus power in FY 2022-23 was significantly lower than the approved figures leading to increase in true up cost claims.

1.2.2 Provisional Power Purchase True-up/ True-down for TSSPDCL for the FY 2022-23

- The Licensee TSSPDCL for H1 of the FY 2022-23 had incurred a miscellaneous cost of towards wheeling, Reactive charges and UI Deviation charges totaling to Rs.74Cr.
- Basis the above power purchase cost incurred at the State level for the FY 2022-23, TSSPDCL is allocated its share of the Power Purchase cost in the approved ratio of 70.55 % and further additions for any additional energy required to meet demand.
- The Provisional Power purchase true-up/true-down cost of the Licensee TSSPDCL for the FY 2022-23 is tabulated below:

PP cost variation TSSPDCL FY 23									
Catagony	Energy Disp	patched	Total	mpact					
Category	Approved	Actual	Approved	Actual	Difference				
Genco Thermal	18983	17400	8657	7950	-707				
GencoHydel	2623	3840	939	939	0				
CGS	14173	11892	5509.08	5657	147.92				
APGPCL and IPPS Gas	0	0	0	0	0				
NCE	5324	6179	2982	3092	110				
Others	16048	10940	6691	7610	-816				
Market	1532	3161	346	2080	1734				
Interstate Sale/UI/Sale/Purchase in 33kV & below	-3570	-1181	-1142	-805	337				
D-D purchase/UI	185	1183	60.12	451	390.88				
Interest on Pension Bonds	-		922.4	922	-0.4				
Miscellaneous	_		=	74	74				
Total	55299	53415	24618.6	25890	1270.39				

 The details of station wise deviations of power purchase cost for the FY 2022-23 is enclosed as Annexure-J.

It is pertinent to mention that, the licensees had prayed before the Hon'ble Commission at various junctures to include the impact of supply of 24 hrs agricultural sales in the relevant regulations or review the approved sales viz., Review petition filed by the licensees on Tariff Order for FY17-18 and Petition filed for Amendment to Regulation 4 of 2005.

However, the same has been declined by the Hon'ble Commission stating that submissions of the TSDISCOMs would be treated as suggestion/input as and when the Commission initiates the process of adding to or amending or varying regulation.

Considering that the power purchase costs and Sales are provisional in nature, the licensees request the Hon'ble Commission to approve the power purchase true up/down without limiting the Agricultural sales to the minimum of Approved or Actual Sales.

The below table briefs about the Power Purchase true up/ True-down for TSSPDCL:

FY	Power Purchase True up/(down) (Rs. Crs)
2022-23* (prov.)	1270.39

1.3 Amendment of Regulation 4 of 2005

The Licensee humbly submits that the present-day power sector depicts different set of conditions from the earlier days owing to the latest developments relating to the significant inclusion of clean energy sources, enlarging the energy market, supplying 24*7 power to all the consumers etc. All these developments have a significant impact on the cost implications of the distribution licensees.

However, Regulation No. 4 of 2005 viz., Terms and Conditions for Determination of Tariff for wheeling and Retail Sale of Electricity that was notified by the Hon'ble Commission suiting the earlier situations does not adapt to the present-day scenario (like incorporating certain provisions relating to banked energy, purchase from solar roof top, considering the actual sales, automatic fuel surcharge adjustment etc) impacting the financials of the licensees.

Further, the licensee submits that, the National Tariff Policy (NTP),2016 mentions that the solvency of distribution sector is key to the success of power sector reforms and hence mandates the Regulatory Commissions to strike the right balance between the requirements of the commercial viability of Distribution Licensees and the Consumer interest and the same is presented below:

"8.0...... Making the distribution segment of the industry efficient and solvent is the key to success of power sector reforms and provision of services of specified standards. Therefore, the Regulatory Commissions need to strike the right balance between the requirements of the commercial viability of distribution licensees and consumer interest....."

Hence, timely revaluation of the Regulations or acts is highly essential in the interests of the stakeholders for the sustainability of the sector.

It is also pertinent to mention that many other state ERCs viz., Gujarat, Delhi, Maharashtra and Uttar Pradesh had issued latest tariff regulations for generation, distribution and retail supply business in line with the tariff policy and latest developments by making suitable amendments.

Recently, the Central Government in exercise of the powers conferred in Section 176 of the Electricity Act, notified "Electricity (Timely Recovery of Costs due to change in Law) Rules,2021" on 22.10.2021. In this connection a letter was received from the Joint Secretary to the Government of India on 09.11.2021 for taking necessary action.

The Central Government afterdetailed consultation with all the stakeholders made the above Rules for anautomatic pass through of impact in cost due to change in law automatically by a formula. These rules shall apply to a generating company and transmission licensee to recover costs due to change in Law from the Distribution companies on monthly basis.

However, it is to submit that there is no such automatic pass-through mechanism of power purchase true-up applicable to the DISCOMs in the erstwhileAPERC Regulation No. 4 of 2005 read with its 1st amendment in Regulation No.1 of 2014 as adopted by Hon'ble TSERC vide its Regulation No.1 of 2014. The implementation of the above said Rules by the Generating Company or transmission licensee on monthly basis without provision for the Distributionlicensee to recover the same on monthly basis from the consumers shall have adverse impact on the financials of the DISCOM leading to huge working capital costs and also affect the entire value chain of the power sector

Hence, in a similar way, the licensees humbly request the Hon'ble Commission to amend the Regulation No. 4 of 2005 adapting the present-day situations and in accordance to the Central Government Rules on "Electricity (Timely Recovery of Costs due to change in Law) Rules,2021"thereby safeguarding the interests of the distribution licensees.

2 Treatment of True-up

2.1 The Context

- Cost true ups are warranted as tariff filings and tariff orders are issued based on futuristic projections of various revenue and cost elements. The variations in projections and actuals should ideally be due to unforeseen changes such as new regulations (increase in Taxes /Coal CESS), natural disasters leading to higher capital investments / operating expenses and other force majeure conditions.
- Efforts should be made by all the stakeholders involved to reduce such true ups of
 costs in business-as-usual scenarios. Higher true up costs will have an adverse
 effect on both the performance of utility (as the gap has to be funded through short
 term sources) and customers (tariff increases to recover such gaps with carrying
 costs).
- This leads to reduced financial capacity of the utility to raise long term finances at competitive rates. Current true ups and the carrying costs have to be borne by customers for future energy procurement.

2.2 Power Purchase True Up/True down

- The Licensee has already elaborated the basis on which it claims the provisional Power purchase true up/down for the FY 2022-23 in the relevant sections of this Petition.
- The below table briefs about the Power Purchase true up/(down) for TSSPDCL:

FY	Power Purchase True up/(down) (Rs. Crs)
2022-23 (prov.)	1270.39

3 Prayer

The Licensee requests the Hon'ble Regulatory Commission:

- To admit the Power Purchase True up Petition filed by the Licensee
- To approve the Power Purchase True upcost as follows for the FY 2022-23

FY	Power Purchase True up/(down) (Rs. Crs)
2022-23* (prov.)	1270.39

- To approve the deviation from the approved values for Power Purchase quantum and costand to allow pass through of the same
- To allow the impact of Power Purchase True up/(down) to be passed on to the consumers.
- To pass any other order as the Hon'ble Commission may deem fit and appropriate under the circumstances of the case and in the interest of justice.
- To condone any errors/omissions and to give opportunity to rectify the same
- To permit the Licensees to make further submissions, addition and alteration to this True-downas may be necessary from time to time.
- To Amend the Regulation 4 of 2005 adapting the present-day situations and in accordance to the Central Government Rules on "Electricity (Timely Recovery of Costs due to change in Law) Rules, 2021".

1	2	2 Annexure J Annual PP Cost FY 2022-23 Annual PP Cost FY 2022-23 Variance													
				FY 2022-23 A	pproved	FY 2022-23 Variance									
idex No. Generating Station		Energy		Annual PP Cost (Rs. Crs.)							PP Cost Variance				
		Approved	Actual	Fixed	Variable	Others	Total	Fixed	Variable	Others	Total	Fixed	Variable	Others	Total
-												15		3	
	GENCO														
	Thermal														
	KTPS D	2249	2265	258	686	0	944	263	600	0	863	-4	86	0	
	KTPS Stage VI	2287	2374	368	753	0	1121	368	625	0	993	0	128	0	1
	RTS B	261	224	70	81	0	151	80	78	.0	158	-10	3	0	
14		0	0	0	0	0	0	0	0	0	0	0	0	0	
	Kakatiya Thermal Power Plant Stage I	2252	2046	300	653	0	953	346	684	0	1029	-46	-31	0	
	Kakatiya Thermal Power Plant Stage II	2759	2870	508	899	0	1407	508	807	.0	1315	0	92	.0	
	BTPS (Manuguru New Project)	5193	4253	830	1115	0	1946	1364	1227	0	2592	-534	-112	0	
	KTP5 VII	3982	3368	569	859	0	1428	748	959	0	1708	-179	-101	0	
	TOTAL THERMAL	18983	17400	2904	5046	0	7950	3677	4980	0	8657	-773	66	0	
	Hydel														
	NSPH	1095	1629	245	0	0	245	245	0	0	245	0	0	0	
	NIZAMSAGAR PH	66	112	33	0	0	33	35	0	0	35	-1	0	0	
	PABM	0	0	0	0	0	0	0	0	0	0	0	0	0	į.
	MINI HYDRO&OTHERS (Chettipeta)	0	0	0	0	0	0	0	0	.0	0	0	0	0	
	SINGUR	0	0	0	0	0	0	0	0	0	0	0	0	0	()
	SSLM LCPH	994	1413	327	0	0	327	327	0	0	327	0	0	0	
	Nagarjunasagar Tail Pond Dam Power House	0	0	0	0	0	0	0	0	0	0	0	.0	0	
	Priyadarshini Jurala Hydro Electric Project- Telangana Share	111	175	44	0	0	44	44	.0	0	44	0	0	0	
	Lower Jurala Hydro Electric Project	223	314	187	0	0	187	187	. 0	0	187	0	0	0	
	POCHAMPAD Stage-II	0	0	0	0	0	0	0	0	0	0	0	0	.0	
	PULICHINTAL(New Project)	119	179	87	0	0	87	87	0	0	87	0	0	0	
	Mini Hydel & Others (Peddapalli, Palair)	2	7	8		0	8	6	0	0	6	1	0	0	
	Ramagiri Wind Mills (AP)	0	0	0	0	0	0	0	0	0	0	0	0	0	
41	Pochampad Stage-IV	13	11	7	0	0	7	7	0	0	7	0	0	0	
							0								
							0								
	TOTAL HYDRO	2623	3840	939	0	0	939	939	0	0	939	0	0	0	
_	TOTAL GENCO	21606	21240	3843	5046	0	8889	4616	4980	0	9596	-773	66	0	
-	4 0 4														
	Central Generating Stations														
	NTPC														
	NTPC (SR)														
	NTPC (SR)	1916	1574	121	544	0	665	128	493	0	621	-7	51	0	
	NTPC (SR) Stage III	514	404	36	124	0	160	38	130	0	168	-2	-6	0	
-	Total NTPC(SR)	2431	1978	157	668	0	825	166	623	0	789	-9	45	0	
-															
	NTPC (ER)														
	Farakka	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Kahalgaon	277	293	51	65	0	116	55	61	0	116	-4	4	0	
	Talcher - Stage 1	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Talcher Stage 2	1128	1211	87	233	0	320	78	196	0		9	37	0	
	CGS: Others	0	0	0	.0	0	0	0	0	0	0	.0	0	0	
-	Total NTPC(ER)	1405	1504	138	298	0	436	133	256	0	389	5	42	0	
	NTPC - Simhadri														
	NTPC - Simhadri NTPC Simhadri Stage I				200				277				-		
	NTPC Simhadri Stage II	2591	2601	290	948	0	1238	252	814	0	1066	38		0	_
		1245	1195	212	420	0	633	173	382	0	555	39	38	0	
	Total NTPC- Simhadri Total NTPC	3836 7672	3796 7278	502 797	1368 2334	0	1870 3131	425 724	1196 2076	0	1621 2799	78 73	172 258	0	

NLC TS-II													-
51 NLC TS II- Stage I	272	42	2	11	0	13	20	72	0	92	-18	-61	0
52 NLC TS II- Stage II	489	71	3	19	0	22	37	129	0	166	-34	-110	0
Total NLC	761	114	5	30	0	36	57	201	0	258	-51	-171	0
NPC								-					\rightarrow
53 NPC-MAPS	41	46	0	12	0	12	0	9	0	9	0	3	0
54 NPC-Kaiga unit Iⅈ	318	550	0	195	0	195	0	111	0	111	0	84	0
55 NPC-Kaiga unit III&IV	316	144	0	50	0	50	0	111	0	111	0	-60	0
Total NPC	676	740	0	257	0	257	0	231	0	231	0	26	0
CGS - New													_
56 Vallur Thermal Power Plant	0	371	100	142	0	242	0	0	0	0	100	142	0
7 Tuticorin	0	464	133	192	0	325	0	0	0	0	133	192	0
58 NPC- Kudankulam	203	252	0	113	0	113	0	80	0	80	0	33	0
59 NLC Tamilnadu Power Ltd	0	0	0	0	0	0	0	0	0	0	0	0	0
60 Kudigi	1236	639	230	340	0	571	208	423	0	630	23	-82	0
80 NCE -Bundled power NVVNL (Coal) JNNSM Ph1	237	211	0	132				110			0		
B3 NCE - Bundled Power (Coal) (NTPC 200 MW)		985			0	132	0		0	110		23	0
DZ NLC Exp I & II	981	985	68	405	0	474	0	387	0	387	68	18	0
Telangana STPP (phase I)	2408	817	185	185	0	370	502	512	0	1014	-318	-327	0
TOTAL CGS	2000					0				0			
TOTAL CGS	14173	11892	1521	4136	0	5657	1490	4019	0	5509	31	117	0
APGPCL													
Total APGPCL	0	0	0	0	0	0	0	0	0	0	0	0	0
IPPs-Gas													
TOTAL IPPS			0	0	0	0	0	Ø	0	0	0	0	0
NCE												=	
74 NCE - Bio-Mass		-					-	-					
	55	20	0	14		14		39		39	0	-24	0
75 NCE - Bagasse	9	- 2	0	0		0	_	5		5	0	-5	0
76 NCE - Municipal Waste to Energy	142	118	0	92		92		111		111	0	-19	0
77 NCE - Industrial Waste based power project	36	20	0	14		14		25		25	0	-11	0
78 NCE - Wind Power	244	238	0	109		109		105		105	0	5	0
00 NTPC Nidhan -Solar-Phase I		1197		339							0	339	0
01 SECI 400 MW	500	490		135	8		0	139		139	0	-4	0
79 NCE - Mini Hydel	8	0	0	0		0		2		2	0	-2	0
No. Company			0			0	0			0	0	0	0
BI NCE - Solar Projects (SPDCL)	3691	3512	0	2094		2094	0	2219		2219	0	-124	.0
B2 NCE - Bundled Power NVVNL (solar) JNNSM Ph 1	60	26	0	28	0	28	0	64		64	0	-36	.0
99 NCE - Bundled Power (Solar) (NTPC 400 MW)	579	555	0	265	0	265	0	274		274	.0	-9	0
84 NCE- Solar Projects (NPDCL)	0		0		0	0	0			0	0	0	0
TOTAL NCE	5324	6179	0	3091	0	3091	0	2982	.0	2982	0	109	0
IPPs-Others		200000							(9)				=
92 Singareni	6380.81009	5440	999	1774	7	2780	999	1496		2495	0	278	7
93 Thermal Power Tech	1665.24809	1578	224	365	26	615	236	376		612	-11	-11	26
94 CSPGCL	4479.62869	1914	517	230	0	746	1077	538		1614	-560	-308	0
95 Thermal Power Tech Unit II TOTAL OTHERS	3522.7026 16048.38947	2008 10940	769 2509	616 2985	36	1387 5529	802 3114	821 3231	0	1623 6345	-34 -605	-205 -247	36
MARKET 97 Bi-lateral Sales(PTC etc.)	1532.254285	3161	0	2080	0	2080	0	346		346	0	1734	0
98 Jhajjar	0	0	0	0	0	0	0	0		0	0	0	0
06 Miscellaneous	0	0	0	0	74	74	0	0		0	0	0	74
04 Interest on Pension Bonds	0	0	922	0	0	922	922	0		922	0	0	0
	-3569.695955	-1181	0	-805	0	-805	0	-1142		-1142	0	337	0
05 Interstate Sale/UI/Sale/Purchase in 33kV & below													
Dt D D sales/Purchase TOTAL MARKET	185.34 -1852	1183 3164	922	451 1726	0 3619	451 6267	922	-736	3530	60 3716	0	391 2462	74

Annexure J Annual PP Cost FY 2022-23 FY 2022-23 Approved FY 2022-23 Variance GENCO Thermal 11 KTPS D 12 KTPS Stage VI 13 RTS B -10 -6 14 NTS 15 Kakatiya Thermal Power Plant Stage I -46 -31 -77 16 Kakatiya Thermal Power Plant Stage II 17 BTPS (Manuguru New Project) -534 -112 -646 18 KTPS VII -179 -101 -280 TOTAL THERMAL -773 -707 Hydel 25 NSPH 29 NIZAMSAGAR PH -1 30 PABM 31 MINI HYDRO&OTHERS (Chettipeta) 32 SINGUR 33 SSLM LCPH 34 Nagarjunasagar Tail Pond Dam Power House 35 Priyadarshini Jurala Hydro Electric Project-Telangana Share 36 Lower Jurala Hydro Electric Project 37 POCHAMPAD Stage-II 38 PULICHINTAL(New Project) 39 Mini Hydel & Others (Peddapalli, Palair) 40 Ramagiri Wind Mills (AP) 41 Pochampad Stage-IV TOTAL HYDRO TOTAL GENCO -773 -707 **Central Generating Stations** NTPC NTPC (SR) 42 NTPC (SR) 43 NTPC (SR) Stage III Total NTPC(SR) NTPC (ER) 44 Farakka 45 Kahalgaon 46 Talcher - Stage 1 47 Talcher Stage 2 48 CGS: Others Total NTPC(ER) NTPC - Simhadri 49 NTPC Simhadri Stage 1 50 NTPC Simhadri Stage II Total NTPC- Simhadri Total NTPC

MCFS-Fig.	
10 10 10 10 10 10 10 10	
50 10 10 20 20 20 20 20 2	- 10
SpeakNC	0
No. Mays	0
53 PEC-MASS	0
SI PICKARS	-
Street S	
35 Mer. Care of Market 316	0
Speal MRC	
St. Control Preserved St.	0
Set Value Primary Power Float 0 371 100 142 0 242 0 0 0 0 0 100 145	- 0
Set Value Primary Power Float 0 371 100 142 0 242 0 0 0 0 0 100 145	
Set Value Primary Power Float 0 371 100 142 0 242 0 0 0 0 0 100 145	
27 Indexembro 0 464 133 132 0 335 0 0 0 0 133 319 329 325 325 0 133 132 0 335 0 0 0 0 0 335 339 339 345 Tannibush Power List 0 0 0 0 0 0 0 0 0	0
SERVEN_ADMINISTRATES 200 202 0	0
20 SECT Empirical Power List	0
Dodg 1296 669 230 340 0 571 208 422 0 630 22 223 233 CT. Builded Fower (Coral) (NTPC 200 MW) 391 395 60 405 0 474 0 337 0 317 0 312	
00 CET. Sended power NAVAPI (Cost) MONDM Ph.) 00 CET. Sended fore (Cost) (NET COS) MONDM Ph.) 981 985 68 68 60 0 0 424 0 387 68 387 68 218 22 NECT Fig. 81 0 0 22 NECT Fig. 81 0 0 22 NECT Fig. 81 0 0 22 NECT Fig. 81 185 185 0 370 502 512 0 1104 -319 -327 612 187 187 187 187 187 187 187 187 187 187	0
30 KC Family 50 50 50 50 50 50 50 5	0
22 K. C. F. B. B.	0
	0
TOTAL CGS 14173 1199	0
NOTAL CGS	0
Reper C. Total ARGPCI. O O O O O O O O O O O O O O O O O O O	
Popular Popu	0
PSP-GGS	
PPG-GS	
NCC	0
NCE	
NCC	
## AKE - Bio-Mass 55 20	0
A N.C. = 180 Mass 55 20 0 14 14 33 37 39 39 0 24 56 N.C. = Dagasse 9 2 0 0 0 0 0 5 5 5 5 0 0.55 56 N.C. = Dagasse 9 2 0 0 0 0 0 5 5 5 5 0 0.55 56 N.C. = Dagasse 9 2 0 0 0 0 0 0 5 5 5 5 0 0.55 56 N.C. = Dagasse 9 2 0 0 0 0 0 0 0 0 5 5 5 5 0 0.55 56 N.C. = Dagasse 9 2 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	
24 NCE - Blo-Mass 55 20	
15 NCE - Sugasse	
16 N.C.E Municipal Waste to Energy 142	0.
77 NCE - Industrial Waste based power project 36 20 0 14 14 25 25 0 -11	.0
18 NCE - Wind Power 244 228 0 109 105 105 105 0 5 5 5 5 5 5 5 5	0
19 NE - Bundled Power Floch 197 339 351 0 339 351 0 339 351 351 0 339 351 35	0
1 1 2 2 2 3 4 4 5 5 6 6 6 6 6 6 6 6	0
9 NE - Mini Hydel	0
NCE - Solar Projects (SPDCL) 3691 3512 0 2094 2094 0 2219 2219 0 10 0 0 0 0 0 0 0	0
NEE - Solar Projects (SPDCL) 3691 3512 0 2094 0 2219 2219 0 124	0
22 NCE - Bundled Power RVVNL (solar) INNSM Ph 1	0
99 NCE - Bundled Power (Solar) (NTPC 400 MW) 579 555 0 265 0 265 0 274 774 0 -9 NCE- Solar Projects (NPDCL) 0 0 0 0 0 0 0 0 0 0 0 0 109 NCE - Solar Projects (NPDCL) 1 PPS-Others 1 Singaren	0
M NCE-Solar Projects (NPDCL)	0
TOTAL NCE S324 6179 0 3091 0 3091 0 2982 0 2982 0 2982 0 109	0
PPS-Others	0
22 Singareni 6380.81009 5440 999 1774 7 2780 999 1496 2495 0 278	0
92 Singareni 6380.81009 5440 999 1774 7 2780 999 1496 2495 0 278 93 Thormal Power Tech 1665.24809 1578 224 365 26 615 236 376 612 -11 -11 94 CSPGCL 4479.62869 1914 517 230 0 746 1077 538 1614 -560 -308 95 Thormal Power Tech Unit II 352.7026 2008 769 616 3 1387 802 821 1623 -34 -205 TOTAL OTHERS 16048.38947 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 MARKET 98 Bi-lateral Sales (PTC etc.) 1532.254285 3161 0 2080 0 2080 0 346 346 0 1734 98 Jhajjar 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 98 Miscellaneous 0 0 0 0 0 74 74 74 0 0 0 0 0 0 96 Miscellaneous 0 0 0 992 0 0 922 922 0 922 0 922 97 John 1704 1704 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	
93 Thermal Power Tech 1665 24809 1578 224 365 26 615 236 376 612 -11 -11 41 479 62869 1914 517 230 0 746 1077 538 1614 -560 -308 765 1616 3 1387 802 821 1623 -34 -205 16048 38947 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247 10940 2509 2880 0 2880	
A CSPGCL	7
Thermal Power Tech Unit II 3522.7026 2008 769 616 3 1387 802 821 1623 -34 -205	26
TOTAL OTHERS 16048 38947 10940 2509 2985 36 5529 3114 3231 0 6345 -605 -247	0
MARKET	3
37 Bi-lateral Sales(PTC etc.) 1532.254285 3161 0 2080 0 2080 0 346 346 0 1734 38 Ihajjar 0 0 0 0 0 0 0 0 0	36
97 Bi-lateral Sales(PTC etc.) 1532.254285 3161 0 2080 0 2080 0 346 346 0 1734 88 Ihajjar 0 0 0 0 0 0 0 0 0 0 0 0 0	
98 Jhajjar 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	
06 Miscellaneous 0 0 0 74 74 0 0 0 0 0 04 Interest on Pension Bonds 0 0 922 0 0 922 922 0 922 0 922 0 0 05 Interstate Sale/Ul/Sale/Purchase in 33kV & below -3569.695955 -1181 0 -805 0 -805 0 -1142 -1142 0 337 D to D sales/Purchase 185.34 1183 0 451 0 451 60 60 60 0 391 TOTAL MARKET -1852 3164 922 1726 3619 6267 922 -736 3530 3716 0 2462	0
04 Interest on Pension Bonds 0 0 922 0 0 922 922 0 922 0 0 05 Interstate Sale/Jul/Sale/Purchase in 33kV & below -3569.695955 -1181 0 -805 0 -805 0 -1142 -1142 0 337 D to D sales/Purchase 185.34 1183 0 451 0 451 60 60 60 0 391 TOTAL MARKET -1852 3164 922 1726 3619 6267 922 -736 3530 3716 0 2462	.0
05 Interstate Sale/UI/Sale/Purchase in 33kV & below	74
05 Interstate Sale/UI/Sale/Purchase in 33kV & below -3569.695955 -1181 0 -805 0 -805 0 -1142 -1142 0 337 D to D sales/Purchase 185.34 1183 0 451 0 451 60 60 0 391 TOTAL MARKET -1852 3164 922 1726 3619 6267 922 -736 3530 3716 0 2462	0
TOTAL MARKET -1852 3164 922 1726 3619 6267 922 -736 3530 3716 0 2462	0
	0
	74
TOTAL 55299 30085 53415 8795 16983 3655 29433 10142 14476 3530 28149 -1347 2507	110