

27/06/2022

**The Secretary  
Uttar Pradesh Electricity Regulatory Commission,  
UPSLDC Complex  
Vibhuti Khand, Gomti Nagar, Lucknow-226010**

Sub:- Reply to 1st information requirement/ discrepancies/ data gap in petition no. 1804 of 2021

Ref : UPERC Letter no UPERC/Secy/D(T)/ 2022/058-353 dated 20.06.2022

Dear Sir,

Kindly find enclosed herewith the Reply to 1st information requirement/ discrepancies/ data gap in petition no. 1804 of 2021(01 original+05 Photo copies), filed by Petitioner Rosa Power Supply Co Ltd, for kind consideration of the Hon'ble Commission.

Thanking you,

Yours faithfully,

For Rosa Power Supply Company Ltd

  
(Sumeet Notani)  
Authorized Signatory

Encl: As above.

1. In the instant Petition, the Petitioner prayed for truing up from FY 2017-18 to FY 2019-20 and ARR for FY 2020-21 to FY 2024-25. The Petitioner is required to provide the status of true up of the past years after COD i.e. for the Period from FY 2014-15 to FY 2016-17

The Tariff for FY 2014-15 to FY 2016-17 was determined by the Hon'ble Commission vide its order dated 29.06.2016. Since the tariff is determined by Hon'ble Commission at the fag-end of said period, Hon'ble Commission itself held that true-up would not be required for this period. Copy of relevant extract from UPERC Order dated 29.01.2018 mentioned below for ready reference.

*"3.1 The Petitioner has filed petition for the FY 2014-15 to FY 2019-20, since the tariffs for FY 2014-15, FY 2015-16 and FY 2016-17 were determined by the Commission vide order dated 29.06.2016 all the factors for these years were taken into consideration and therefore no True-up for the FY 2014-15, 2015-16 and FY 2016-17 is required to be issued."*

2. The Petitioner is required to provide the copy of audited accounts/documentary evidence duly certified by auditor for expenses for FY 2017-18, FY 2018-19 and FY 2019-20 for transmission line/ business;

RPSCIL is in the process of obtaining relevant information and shall submit the same duly certified by auditor shortly.

3. The Petitioner is required to provide the detail of actual Transmission System Availability Factor from FY 2014-15 to FY 2021-22.

RPSCIL being a dedicated transmission line has not maintained separate record for transmission availability and we are in the process of calculating the actual availability as per UPERC Regulations and shall submit the same shortly.

4. The Petitioner is required to substantiate the PGCIL charges in its balance sheet. Further, the Petitioner is required to provide the PGCIL bill on sample basis for each financial year from FY 2017-18 to FY 2019-20. Further, the Petitioner is required to provide the detail of actual payment made to PGCIL towards bay maintenance cost against the invoice claimed by PGCIL

PGCIL charges are categorized under Repairs and Maintenance Expenses in Audited books of accounts. One sample invoice for each year i.e, FY 18 to FY 20 enclosed as Annexure 2. Statement of actual bill wise payment made to PGCIL enclosed as Annexure 1.

5. The Petitioner is required to bifurcate the combined O&M Expenses of generation and transmission line/business. It is observed that the Petitioner has only claimed R&M Expenses and PGCIL charges towards O&M Expenses. The Petitioner is required to provide the basis for claiming the same.

As submitted in the petition, O&M Charges were not bifurcated between the Generation and Transmission business in Rosa. Considering the same fact, Hon'ble Commission has allowed a Normative O&M Expenses of 2% of capital cost of transmission asset in addition to actual bay maintenance charges.

RPSCIL has claimed O&M Charges for the control period from FY 2020-21 to FY 2024-25 based on the provisions of MYT for Distribution and Transmission Regulations, 2019,



wherein Employee Cost, R&M Expenses and Administrative & General Expenses are calculated based on past year data escalated by WPI and CPI (in the ratio of 60:40)

6. The Commission in its Order dated 29.06.2016 approved the closing GFA for FY 2016-17 as Rs. 21.82 Crore, whereas the Petitioner has considered the closing GFA on 31.03.2017 as Rs. 33.31 Crore in its Petition. Further, scrutinizing the Petition, it is observed that the Petitioner has derived the closing GFA for FY 2016-17 after adding Rs. 11.49 Crore in opening GFA of FY 2016-17 (Rs. 21.82 Crore). The Petitioner is directed to provide the basis for variation in closing GFA of FY 2016-17 against the approved value.

Additional capital cost (Rs. 11.49 Crs) towards installation of bays at PGCIL's sub-station considered by RPSCL based on actual date of commissioning of said two bays i.e., 22.03.2017 and 04.03.2017 respectively. However, Hon'ble Commission in its order dated 29.06.2016 inadvertently considered commissioning date as 31.03.2017 and considered additional capital cost w.e.f 01.04.2017.

In view of the above, requesting Hon'ble Commission to consider the addition to GFA in FY 2016-17 as per actual commissioning date of 400 kV bays of RPSCL.

7. The Petitioner is required to provide the Fixed Asset Register for transmission line/ business clearly detailing each asset along its capital expenditure plan, capitalization, depreciation etc.

RPSCL shall submit Fixed Asset Register shortly.

8. The Commission observed variation in closing loan and equity for FY 2016-17 considered by the Petitioner when compared to closing loan and equity base approved in Order dated 29.06.2016. The Petitioner is required to provide the reason for variation.

Refer our reply against point no. 6

9. The Petitioner is required to provide the actual loans outstanding and actual equity as on March 31, 2017, March 31, 2018 and as on March 31, 2019 along with documentary evidence;

RPSCL has not obtained separate financing for the transmission asset and as advised by Hon'ble UPERC in its order dated 16 May 2012 / 25 Jun 2012 in Petition no # 786 of 2012, RPSCL filed separate petition for approval of transmission tariff.

Further, RPSCL submitted loan details of Rosa TPP as per Regulation 23.5 of UPERC (MYT for Distribution and Transmission) Regulations 2019.

10. As per your submission, it is observed there is no loan and equity infusion during the period from FY 2017-18 to FY 2019-20. The Petitioner is required to provide the detail of actual loan and equity infusion, if any during FY 2017-18, FY 2018-19 and FY 2019-20 along with documentary evidence;

May please refer to our reply at point no 6 above. Actual date of Commissioning of RPSCL's two Bays at Shajahanpur Substation of PGCIL is 22.03.2017 and 04.03.2017 respectively. However, Hon'ble Commission has inadvertently considered Commissioning date as 31.03.2017 and considered additional capital cost towards bays of Rs. 11.49 Crs wef 01.04.2017.

Based on the above facts, there were no additional equity / loan incurred by RPSCL during FY 2017-18 to FY 2019-20.

- 11. The Petitioner is required to provide the documentary evidence of actual interest paid during the FY 2017-18, FY 2018-19 and FY 2019-20;**

RPSCL does not have separate loan accounts for transmission and as per Regulation 23.5 of UPERC (MYT for Distribution and Transmission) Regulations 2019, RPSCL submitted actual loan details of Generation Business during the period FY 2017-18 to FY 2019-20.

- 12. The Petitioner is required to provide the detail of security deposits from consumers, if any for the period from FY 2017-18 to FY 2019-20;**

No such security deposits received from consumers

- 13. The Petitioner is required to provide the details of actual revenue realized during the FY 2017-18 to FY 2019-20 along with documentary evidence. Further, the Petitioner is required to provide the LPS/ incentive, if any.**

Please find below summary of actual revenue realized during FY 18 to FY 20:

S No	Year	Approved Transmission Charges as per UPERC order dated 29.01.2018 (Rs Crs)	Actual Revenue realized from UPPCL (Rs Crs)	Remarks
1	FY 18	6.06	6.06	Invoices dated 05.03.2018
2	FY 19	5.84	5.84	Invoices dated 25.10.2018, 03.12.2018 & 04.01.2019
3	FY 20	5.64	5.64	Invoices dated 03.07.2019, 03.10.2019, 03.01.2020, 20.03.2020

- 14. The Petitioner is required to provide the details of actual decapitalization since COD to FY 2019-20, substantiating the same with documentary evidence. Further, the Petitioner is required to provide the details of proposed decapitalization for the MYT period from FY 2020-21 to FY 2024-25 along with justification.**

No assets were decapitalized in the past period and proposed to be decapitalized during the MYT period from FY 21 to FY 25

- 15. The Petitioner is required to provide the detail calculation of interest rate @ 12.80% considered by Petitioner for calculation of Interest on Working Capital for FY 2017-18 to FY 2019-20;**

As per UPERC Transmission Tariff Regulations, IoWC shall be on normative basis at State Bank Advance Rate (SBAR) as of the date on which petition for determination of tariff is accepted by the Commission. UPERC vide order dated 29.01.2018 approved interest rate of 12.8% for calculating Interest on Working Capital. We have considered the same as approved by Hon'ble Commission.

- 16. The Petitioner is required to provide the basis for claiming the depreciation @5.27% per annum for the period from FY 2017-18 to FY 2019-20 and depreciation @5.28% for the MYT Period from FY 2020-21 to FY 2024-25;**

Depreciation rate @ 5.27% for the period from FY 2017-18 to FY 2019-20 considered as per UPERC (MYT Regulations), 2014 dated 12.05.2014 and the same is also considered by Hon'ble UPERC in its order dated 29.01.2018.



However, the Depreciation Rate of 5.28% for the MYT period from FY 2020-21 to FY 2024-25 is considered based on UPERC (MYT for Distribution and Transmission) Regulations, 2019 dated 23.09.2019

- 17. It is observed that the Petitioner has claimed Rs. 0.17 Crore as Contribution towards Contingency Fund for each financial year of MYT period from FY 2020-21 to FY 2024-25. In compliance to Regulation 27.1 of MYT Regulations, 2019, the Petitioner is required to submit the detailed proposal detailing the securities in which Contingency Fund will be invested.**

RPSCL is proposing to invest Contribution towards Contingency Fund in Government Bonds as authorized under Indian Trusts Act, 1882.


- 18. The Petitioner is required to provide the detail of actual energy wheeled and transmission losses for the period from FY 2014-15 to FY 2021-22 duly certified by UPSLDC. Further, the Petitioner is required to provide the basis for estimating the energy for the MYT period from FY 2020-21 to FY 2024-25.**

RPSCL being a dedicated transmission line is not maintaining records with reference to transmission losses and shall submit the information related to wheeled energy subsequently.

Further, the estimated energy for the period from FY 21 to FY 25 mentioned at Form F1/F4 is calculated assuming the maximum net sent out energy from Stage II (2 x 300 MW) of RPSCL at 85% availability.

**For Rosa Power Supply Company Limited**

Place: Lucknow  
Date: 27.06.2022

  
(Sumeet Notani)  
**Authorized Signatory**

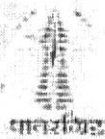
**Statement of PGCIL Invoice towards bay maintenance charges and  
corresponding payment made to PGCIL**

Year	From	To	Total Invoice value (Rs Lacs)	Actual payment made by Rosa* (Rs Lacs)	Date of payment
FY 18	01-Apr-17	30-Sep-17	59.64	58.63	08-May-18
	01-Oct-17	31-Dec-17	29.82	29.31	08-May-18
	01-Jan-18	31-Mar-18	29.82	29.32	19-Jul-18
FY 19	01-Apr-18	30-Jun-18	30.81	30.29	08-Aug-18
	01-Jul-18	30-Sep-18	30.81	30.29	20-Oct-18
	01-Oct-18	31-Dec-18	30.81	30.29	07-Jan-19
	01-Jan-19	31-Mar-19	30.81	30.29	04-Apr-19
FY 20	01-Apr-19	30-Jun-19	37.94	37.29	24-Sep-19
	01-Jul-19	30-Sep-19	37.94	37.29	17-Oct-19
	01-Oct-19	31-Dec-19	37.94	37.29	14-Jan-20
	01-Jan-20	31-Mar-20	37.94	37.29	05-May-20

\* Net value after deducting TDS







पावर ग्रिड कॉर्पोरेशन ऑफ इंडिया लिमिटेड

POWER GRID CORPORATION OF INDIA LIMITED

POWER GRID CORPORATION OF INDIA LIMITED

A.C. Corporation of India Corporation

Power Grid Corporation Of India  
2nd, 3rd AND 4th FLOOR 12 RANA PRATAP MARG  
LUCKNOW 226001 IN  
GSTIN - 09AAACP0252GZZQ  
PAN No - AAACP0252G  
Tax Invoice

Invoice No. : CI0900000042				Date : 23-03-2018							
Serial No : 94000322				CIN No. : L40101DL1989GOI038121							
<b>To :</b>				<b>Place Of Supply :</b>							
Name		ROSA POWER SUPPLY COMPANY LIMITED ROSA		Name		ROSA POWER SUPPLY COMPANY LIMITED ROSA					
Address		Shahjahanpur HARDOI ROAD 242406 IN		Address		Shahjahanpur HARDOI ROAD 242406 IN					
State / Union Territory		Uttar Pradesh		State / Union Territory		Uttar Pradesh					
State / Union Territory Code		09		State / Union Territory Code		09					
Customer PAN		AABCR8917M		GSTIN		09AABCR8917M1ZR					
GSTIN		09AABCR8917M1ZR									
<b>Subject :</b> O&M of 04 No of 400 kV Bays at 400/220 kV POWERGRID, Shahjahanpur Substation. Billing Period: 01.01.2018 - 31.03.2018											
<b>Ref :</b> Clause no. [5] of agreement dated 18.08.2017				<b>SAC :</b> 998312							
S.No	Description of service	Consultancy Fee		CGST		SGST		IGST		UTGST	
		Rate	Amount	Rate	Amount	Rate	Amount	Rate	Amount	Rate	Amount
1	BAY MAINTENANCE CHARGES		2527248.00								
	Discount		0.00								
	Total		2527248.00	9.00	227452.00	9.00	227452.00	0.00	0.00	0.00	0.00
<b>Total GST :</b>		<b>454904.00</b>									
<b>Total:</b>		<b>2982152.00</b>									
<b>Total (In Words) :</b>		<b>Rupees Twenty Nine Lakh Eighty Two Thousand One Hundred Fifty Two Only</b>									
<b>Weather reverse charge applicable (Y / N)</b>				<b>N</b>							

For &amp; on behalf of Power Grid Corporation of India Limited

*Ranesh*  
23/03/18  
NAME OF SIGNING AUTHORITY  
DESIGNATION(DEPARTMENT)

1 % rebate will be applicable, if payment is made within 15 days from date of bill. Surcharges @ 1.25 % per month (15% p.a) Per month will be levied, if the Payment received after 15 days from the date of Bill. i.e. 22.03.2018 The payment may be released through DD or RTGS to POWER GRID CORPORATION OF INDIA LTD. (State Bank of India, Bank Account No. 35993181978 & IFSC : SBIN0000125) under intimation to POWERGRID Lucknow Office.

स्वहित एवं राष्ट्रहित में ऊर्जा बचाए  
Save Energy for Benefit of Self and Nation



पावर ग्रिड कारपोरेशन ऑफ इंडिया लिमिटेड

(भारत सरकार का उद्यम)

POWER GRID CORPORATION OF INDIA LIMITED

(A Government of India Enterprise)

Power Grid Corporation Of India  
2nd, 3rd AND 4th FLOOR 12 RANA PRATAP MARG  
LUCKNOW 226001 IN  
GSTIN - 09AAACP0252G2ZQ  
PAN No. - AAACP0252G  
Tax Invoice

Invoice No. : CI0900000105				Date : 27-03-2019							
Serial No. : 94000360				CIN No. : L40101DL1989GOI038121							
<b>To :</b> Name ROSA POWER SUPPLY COMPANY LIMITED ROSA Address Shahjahanpur HARDOI ROAD 242406 IN State / Union Territory Uttar Pradesh State / Union Territory Code 09 Customer PAN AABCR8917M GSTIN 09AABCR8917M1ZR				<b>Place Of Supply :</b> Name ROSA POWER SUPPLY COMPANY LIMITED ROSA Address Shahjahanpur HARDOI ROAD 242406 IN State / Union Territory Uttar Pradesh State / Union Territory Code 09 GSTIN 09AABCR8917M1ZR							
O&M of 04 No of 400 kV Bays at 400/220 kV POWERGRID, Shahjahanpur Substation. Billing Period: 01.01.2019 - 31.03.2019 Dear Sir, <b>Subject :</b> Pursuant to above reference, we are enclosing herewith an invoice for Rs. 30,81,099/- towards release of Consultancy Fee alongwith applicable GST on Consultancy Fee. It is requested to release the above mentioned amount in favour of Power Grid Corporation of India Limited at the earliest.											
Ref :				SAC : 998312							
S.No	Description of service	Consultancy Fee		CGST		SGST		IGST		UTGST	
		Rate	Amount	Rate	Amount	Rate	Amount	Rate	Amount	Rate	Amount
1	BAY MAINTENANCE CHARGES		2611101.00								
	Discount		0.00								
	Total		2611101.00	9.00	234999.00	9.00	234999.00	0.00	0.00	0.00	0.00
Total GST :		469998.00									
Total:		3081099.00									
Total (In Words) :		Rupees Thirty Lakh Eighty One Thousand Ninety Nine Only									
Weather reverse charge applicable (Y / N )		N									

अभिषेक सिंह  
मुख्य प्रबंधक  
कर्मचारी सं. 0817  
पावर ग्रिड, शाहजहाँपुर उपकेन्द्र  
28/3/19

स्वहित एवं राष्ट्रहित में ऊर्जा बचाएं  
Save Energy for Benefit of Self and Nation





पावर गिड कारपोरेशन ऑफ इंडिया लिमिटेड  
(अरन सप्लायर का उद्यम)

POWER GRID CORPORATION OF INDIA LIMITED  
(A Government of India Enterprise)

Power Grid Corporation Of India  
2nd, 3rd AND 4th FLOOR 12 RANA PRATAP MARG  
LUCKNOW 226001 IN  
GSTIN - 09AAACP0252G2ZQ  
PAN No. - AAACP0252G  
Tax Invoice

Invoice No. : CI0912190009				Date : 31-03-2020							
Serial No. : 94000390				CIN No. : L40101DL1989GOI038121							
<b>To :</b> Name ROSA POWER SUPPLY COMPANY LIMITED ROSA Address Shahjahanpur HARDOI ROAD 242406 IN State / Union Territory Uttar Pradesh State / Union Territory Code 09 Customer PAN AABCR8917M GSTIN 09AABCR8917M1ZR				<b>Place Of Supply :</b> Name ROSA POWER SUPPLY COMPANY LIMITED ROSA Address Shahjahanpur HARDOI ROAD 242406 IN State / Union Territory Uttar Pradesh State / Union Territory Code 09 GSTIN 09AABCR8917M1ZR							
<b>Subject :</b> O&M charges for 04 Nos. 400 kV bays at 400/220 kV Shahjahanpur, POWERGRID S/s (From 01.01.2020 to 31.03.2020)											
<b>Ref :</b> Clause no. [4.0] of agreement dated 19.08.2019				<b>SAC :</b> 998312							
S.No	Description of service	Consultancy Fee		CGST		SGST		IGST		UTGST	
		Rate	Amount	Rate	Amount	Rate	Amount	Rate	Amount	Rate	Amount
1	BAY MAINTENANCE CHARGES		3215000.00								
	Discount		0.00								
	<b>Total</b>		3215000.00	9.00	289350.00	9.00	289350.00	0.00	0.00	0.00	0.00
<b>Total GST :</b>		<b>578700.00</b>									
<b>Total:</b>		<b>3793700.00</b>									
<b>Total (In Words) :</b>		Rupees Thirty Seven Lakh Ninety Three Thousand Seven Hundred Only									
<b>Weather reverse charge applicable (Y / N )</b>		N									

For & on behalf of Power Grid Corporation of India Limited

*[Signature]*  
31/03/2020  
Chief Manager

स्वहित एवं राष्ट्रहित में ऊर्जा बचाएं  
Save Energy for Benefit of Self and Nation