

Reply to Additional data requirement pertaining to 2nd deficiencies observed in the petition for Truing up for FY 2019-20, APR for FY 2020-21 and Business plan and MYT for control period for FY 2021-22 to FY 2025-26 and Tariff for FY 2021-22 of Jharkhand Bijli Vitaran Nigam Limited (JBVNL)

A. General

1. The petitioner should submit the MS Excel revised true up for FY 2019-20 and Business plan and MYT Model (including Sales and Revenue) with proper linkages and formulas including any with associated files containing computation to conduct prudence of the same

Reply:

JBVNL has submitted MS Excel based working model of ARR to the Hon'ble Commission on 01.12.2020 to e-mail address info@jserc.org through JBVNL e-mail id cecr2018@gmail.com. Copy of email is provided at **Annexure-B** in the 1st data gap reply.

However, as asked, the required MS excel sheet is again provided as a soft copy attachment as in annexure 1 and sent to the mail info@jserc.org

2. The petitioner should submit the formulas in soft copy for truing up for FY 2019-20, APR for FY 2020-21, Business Plan and MYT for FY 2021-22 to FY 2025-26

Reply:

The required MS excel sheet is provided as a soft copy attachment as in annexure 2 and sent to the mail info@jserc.org

3. The reply submitted in 1st data gap requirement to be submitted in soft copy along with annexures

Reply:

The reply submitted in 1st data gap requirement is provided as a soft copy attachment as in annexure 3 and sent to the mail info@jserc.org

4. The petitioner is required to submit audited accounts for FY 2015-16 to 2020-21

Reply:

The audited accounts for FY 2015-16 to 2020-21 (soft copies) are being submitted to JSERC through email to info@jserc.org

B. True up for FY 2019-20

1. The petitioner is directed to submit the consumer category wise sales, connected load, and number of consumers duly certified by the energy auditor for FY 2019-20.

Reply:

The consumer category wise sales, connected load and number of consumers for 2019-20 is provided below:

	FY 2019-20		
Category	Connected load(kW)	Effective Cons	Units Sold (units)
DS-1 (A)	745800.5	1287034	1214138583
DS-1 (B)	1319574.25	1710314	2628277326
DS-2	1164298	999427	1519962087
DS-3	325156	52889	303262153.7
NDS-1	33210.2	37285	80805875
NDS-2	545535.5	204323	774855916.5
NDS-3	15572	1676	21941145.66
LTIS	255782	15797	201152553
LTIS-D	22424	1206	17932146
IAS-1	67986.5	59026	190681588
IAS-2	955	445	3224729
SS-1	7181	260	45959014
SS-2	0	61	0
HT	801348	1759	2312700091
Total	5304822.95	4371502	9314893207

2. The petitioner is required to submit the monthly MOD followed during the FY 2019-20.

Reply:

In its first data gap reply, JBVNL had provided the basis of Merit Order Dispatch of its power plant scheduling. The letter requesting ERLDC for scheduling full allocated power and the list of variable charge of various power plants was provided in reply to the 1st data gap.

In the MERIT APP of ministry of Power, the data for last 1 month can be sourced only. It does not store the data for previous years. We have submitted earlier a letter dated 29th March 2021 requesting ERLDC for scheduling full allocated power on 30th March 2021. As such, the monthly MOD followed during the FY 2019-20 is attached in Annexure A

- In the bifurcation of power purchase expense for FY 2019-20 submitted by the petitioner in Annexure F of 1st additional data requirement under point 5 and under table 2.2 of the revised petition discrepancy has been observed in actual quantum and power purchase cost. In this regard, the petitioner is required to remove discrepancy and submit the revised amount.

Reply:

The discrepancy related to actual quantum and power purchase cost has been removed and the revised data is submitted in annexure B.

- The petitioner is required to submit the summary of power purchase bills in soft copy (excel) and the same in hard copy. Further, petitioner is required to submit reconciliation of power purchase cost with the statement vis-à-vis power purchase cost as per audited accounts submitted by the petitioner along with revised petition.

Reply:

JBVNL submits that the documentary proof of power purchase cost is very voluminous and hence, it would be very difficult for JBVNL to submit the documents in hard copy. However, the documentary proofs for power purchase bills are being collated and will be submitted shortly in form of hard copies. The soft copy of the same is attached for for verification purpose.

The summary of power purchase bills and its reconciliation in soft copy is submitted in Annexure C .

- The petitioner is required to submit the compliance made against the RPO target approved by the Commission for FY 2019-20 for Solar and Non-Solar separately

Reply:

The JBVNL submits that it was unable to achieve the RPO Targets in FY 2019-20 but to achieve the RPO targets in the future years, JBVNL is under process to procure the power from new renewable sources.

As far as RPO compliance is concerned, JBVNL would like to inform Hon'ble Commission that it has over-achieved Non-Solar RPO and met 5.1% RPO. However, in case of solar RPO, the target of 6.55% as per JSERC (Renewable Energy Purchase Obligation and its compliance) Regulations, 2016 in FY 2019-20 has not been met . JBVNL has therefore only been able to purchase 0.3% of its power (excluding hydro power) from solar plants.

		Solar (MU)			
Year	Total Power Purchase (MU)	Target %	RPO obligation (MU)	Achieved (MU)	% Achieved
2019-20	11907.26	6.55	779.92	32.249	4.13

		Non Solar (MU)			

Year	Total Power Purchase (MU)	Target %	RPO obligation (MU)	Achieved (MU)	% Achieved
2019-20	11907.26	5	595.36	606.4	101.85

6. The petitioner has claimed adjustment (credit) of Rs 2.96 crores in APRNL power purchase bill. In this regard, the petitioner is required to submit documentary evidence for the same.

Reply:

As payment of extra amount to ERLDC due to revision/cancellation is not due to fault of JBVNL, hence JBVNL bills this amount further to APNRL as adjustment charges to prevent any pass through of this amount to its consumers.

In FY 2019-20, the net effect of this amount was Rs. 2.96 crore, which JBVNL has claimed as an adjustment from APNRL. The documentary evidence is provided as in annexure D . The summary of the adjustment is provided below for reference.

Summary of APNRL:

Month	Total Unit II APNRL	rebate under Shakti scheme (Rs)	Admitted Amount (Rs)	ADJUSTMENT (Rs)		
Apr-19	158357304		155578432	3299	895138	
May-19	146143195		145878085	10893	2955271	15000
Jun-19	161655353		158339339			
Jul-19	155553605	421176	153755855	8152.46	2,587,591	
Aug-19	161001216	571899	157895057	3383	1073679	
Sep-19	154369218	1065504	151667972	5742.62	2209186	
Oct-19	130802470	978763	129736966	17138.04	6593004	
Nov-19	108607479	628470	107628716	15031.69	5782691	
Dec-19	156533814	945355	153002595	3450.19	1054367	
Jan-20	165463133	862869	161188584	157.81	47311	
Feb-20	140923511	607849	139851677	10253.60	3094029	
Mar-20	147417721	550247	146394787	10792.19	3271113	
Total	1786828018	6632132	1760918064		29563380	15000

7. In 1st additional data requirements, the Petitioner were required the documentary evidence towards claim of Rs 210.24 crores towards Inter state Transmission Charges, however. The petitioner has not submitted the same. In this regard, the petitioner is required to submit the Bill Summary Statement of Inter State Transmission Charges of Rs. 210.24 crores, along with the reconciliation with Bill Summary Statement as per the audit accounts. Further, the petitioners to submit the actual bills for the same in hard copy.

Reply:

The reconciliation with the bill of interstate transmission charges of Rs 210.24 crores is provided in the hard copy and a sample of the same is provided in annexure E. The hard copies of the same will be provided separately.

8. The petitioners are required to submit the actual inter state transmission loss (52 weeks region wise actual inter state transmission loss in percentage in a workable excel sheet) for FY 2019-20.

Reply:

The POSOCO has the region wise POC loss for each generating stations. But, calculation of inter state transmission losses would be a huge task as each generating station loss slab will be taken against the Jharkhand withdrawal losses and added upon to find the inter state transmission loss for that POC. Similarly, for all generating stations loss need to be calculated at the POC for Jharkhand region and then average out to find the average inter state transmission losses. Hence, all weekly sheets of transmission loss available on the POSOCO website are submitted for the kind consideration of the commission.

The details of the same can be referred from the following link:

<https://posoco.in/side-menu-pages/applicable-transmission-losses/transmission-losses-2019-20/>

9. The petitioner is required to submit actual bills in hard copy towards claim of Rs 206.28 crores towards intra state transmission charges. Further, the petitioner is required to submit the Bill Summary Statement of Intra State Transmission Charges of Rs. 206.28 crores, along with the reconciliation with Bill Summary Statement as per the audit accounts.

Reply:

The bills for intra state transmission charges of Rs 206.28 crores is provided in annexure F. The reconciliation with bill summary statement as per the audit accounts is in progress and will be provided shortly.

10. The petitioner is required to submit the Actual Intra State Transmission Loss of JUSNL in %age for FY 2019-20

Reply:

JBVNL would like to submit that it has calculated transmission losses (Both inter and intra State) by subtracting total input energy received at 33 kV from total energy purchased from various power plants. JBVNL thereafter considers Inter State Transmission Losses at 3% of all power purchase from external sources considering Point of Connection (PoC) withdrawal losses for Jharkhand and PoC injection losses of various power plants with which it has PPA. Thereafter JBVNL segregates Intra-State Transmission Loss by subtracting Inter-State Transmission Charges from total Transmission losses.

The Hon'ble commission is requested to consider the figures from audited accounts of 2019-20. The transmission loss as per audited accounts 2019-20 is provided below:

Computation of AT&C Loss for the F.Y 2019-20 on the basis of the new guideline from CEA

Computation of AT&C Loss on the basis of the new guideline from CEA- 2019-20		
Particulars	Formula	Figures in Lakh
Gross Energy Purchased (KWH)		127,076.06
Transmission Losses (KWH)		6,061.83
Transmission Losses %		4.77%
Net Input Energy (KWH)		121,014.22
Total Units Sold (KWH)		93,148.93
Total Revenue from Sale of Energy including Rev Grant & Subsidy (Revenue Grant- Rs. 600 Cr, Subsidy- Rs. 1329.04 Cr)- INR		640,507.35
Adjusted Revenue - INR (Adjustment of Revenue Grant-NIL, Revenue Grant received Rs. 600 Cr, Subsidy Received- Rs. 1350 Cr)-INR		642,604.08
*Opening Debtor for Sale of Energy - INR		628,302.69
Closing Debtor for Sale of Energy - INR		717,367.44
Closing Debtor for Sale of Energy - INR		717,367.44
Any write off		-
Adjusted Closing Debtor - INR	(i + ii)	717,367.44
Collection Efficiency (%)	(F+G-I)/E	86.42%
Units Realised (KWH)	(D*J)	80,501.18
Units Unrealised (KWH)	C-K	40,513.04
AT & C Loss (%)	L/C	33.48%

*Adjustments to opening debtor because of prior period adjustment:

11. In reply to 1st additional data requirements under point 9 the petitioner has submitted that day wise deviation in schedule and actual drawl and resultant deviation charges along with additional deviation charges is attached in Annexure H. However, it has been observed that Annexure H has not been submitted to the Commission. Therefore, the petitioners are required to submit the same in hard and soft copy.

Reply:

Details of day-wise deviation in scheduled and actual drawl and resultant deviation charge along with additional deviation charges have been attached at Annexure-G

12. The petitioner in reply to 1st additional data requirement has submitted that due to pay revision the employee expenses has increased by 10% (i.e Rs 18 crores). In this regard, the petitioner is required to submit the Bifurcation of Sub Head wise Employee Expenses for FY 2019-20.

Reply:

The Petitioner in its Petition dated 30th Nov. 2020 has claimed the Employee Expense as per provisional Balance sheet of FY 2019-20 where it was Rs. 306.71 Crore. However, as per annual accounts audited by Statutory Auditor for FY 2019-20 it is Rs. 219.26 Crore and JBVNL is claiming the same in the Revised True-up Petition for FY 2019-20.

It is requested to the Hon'ble Commission to consider the value claimed in revised True-up Petition for FY 2019-20 as per audited balance sheet.

13. It has been observed that in revised true up petition the A&G and R&M expenses has increased against the approved value for FY 2019-20. In this regard, the petitioner is required to submit the justification.

Reply:

In line with the Clause 6.6 (b) and (c) of JSERC MYT Regulations 2015, the A&G expenses for FY 2019-20 have been calculated by escalating A&G expense of FY 2018-19 by the inflation factor of 4.66%. Also, In line with the Regulation 6.6 (a) of JSERC MYT Regulations 2015, the R&M expenses for FY 2019-20 have been estimated by applying K-factor of 2.34% as approved by the Hon'ble Commission in Tariff Order dated 28th Feb'19 on opening value of GFA for FY 2019-20 as submitted above.

14. In 1st Additional data requirement under point 15, the petitioner is required to provide the documentary evidence of Grants and Consumer Contribution as submitted in the Petition. Further, the Petitioner is also required to provide the details of actual amount received under grants and Consumer Contribution. However, it has been observed that Petitioner has not submitted the same to the commission. Therefore, the Petitioner is required to submit the same.

Reply:

The details of consumer contribution received from all divisions would be a huge task and voluminous in nature. However, it is yet to collect all the information related to consumer contributions. The details for the government grants for FY 2019-20 and the corresponding bills are provided as in annexure H of the document.

Thus, we are requesting the Hon'ble commission to consider The CCG (Consumer Contribution and Grants) of JBVNL, based on the annual accounts for FY 2019-20 vis-à-vis as approved by the Hon'ble Commission is provided in the Table below. As per table 2.10 of revised true up, the figures are mentioned below:

Particulars	Approved (Rs. Crore)	Actual (Rs. Crore)
CCG Opening	6,882.51	6,882.51
Addition in CCG	1,316.91	731.64
Closing CCG	8,199.42	7,614.15

15. The Petitioner should submit the scheme wise reasons for deviation in capitalization of assets as claimed in revised Petition against that approved in the MYT Order.

Reply:

The Scheme-wise actual capex schedule for FY 2019-20 as per JBVNL annual accounts of FY 2019-20 is detailed in the Table below: As per revised true up submitted in table 2.8, the figures are provided below:

Table **Error! No text of specified style in document.**-1: Capital Expenditure Schedule of JBVNL for FY 2019-20

Scheme wise	Approved (Rs Cr)	Actual (Rs Cr)
DDUGJY		1,485.63
IPDS		248.06
RAPDRP – A	15.50	54.40
RAPDRP – B		261.14
DDUGJY 12th Plan		487.63
ADP + Misc.	638.18	201.98
Tilka Manjhi & AGJY	45.59	20.86
RE State Plan		3.94
JSBAY	961.00	1,003.22
RGVY (10th & 11th Plan)		-
SAUBHAGYA	90.00	75.21
Total	1,750.27	3,842.08

It is submitted that capex of Rs. 3,842.08 crore has been incurred as against approved Capex of Rs. 1,750.27 Cr in FY 2019-20 as JBVNL aggressively implements the central and state government's scheme on the ground. Also, the revision in capital expenditure is majorly due to timings of payments which are linked to completion of works under various schemes. It is also pertinent to mention that since implementation of large schemes such as Jharkhand Sampurna Bijli Achyadan Yojna (JSBAY) was started in

2018 itself, a significant amount was disbursed in 2019-20 as the work picked pace. In the initial year of project implementation, the disbursement for the scheme was less and as and when the program picks up, the speed of the delivery execution increases, hence the increase in payment under the scheme.

16. In 1st Additional data requirement under point 16, the petitioner was required to provide the project/scheme completion certificate certifying that the project/scheme is completed and in operation/put to use. The same has not been submitted by the Petitioner in annexure-J. Therefore, the petitioner is required to submit the same duly signed by statutory auditor.

Reply:

The completion certificate of few projects/schemes completed in FY 2019-20 and readily available with the licensee are attached as Annexure-I for the reference of the Hon'ble Commission.

17. The Petitioner should confirm that depreciation in FY 2019-20 is not more than 90% of GFA for all assets since assets cannot be depreciated beyond 90% of GFA in accordance with tariff Regulations.

Reply:

JBVNL confirms that depreciation in FY 2019-20 is not more than 90% of GFA for all assets in accordance with the tariff regulations.

18. The Petitioner is required to submit Fixed Asset Register (FAR) in accordance with the provision of the Tariff Regulations for FY2019-20 in a workable excel sheet. Further, the petitioner is required to submit the computation of depreciation in a workable excel sheet with all linkage in accordance with the provision of the Tariff Regulations.

Reply:

JBVNL is in the process of having its own Fixed Asset Register (FAR). Thus, the technical evaluation Report was sent by JBVNL to World Bank and approved by World Bank. After approval was received from World Bank, price part was opened. Financial Evaluation was sent to World Bank and approved. Further, LoI issuance to the successful bidder is under process. The computation of depreciation is provided in the workable excel sheet under GFA sheet as provided in annexure 2 of general query.

19. The petitioner should submit the details of the actual loan portfolio as on 1st April 2019, for calculation of weightage average rate of interest as per Regulation 6.24 of the Tariff Regulations, 2015 in a workable excel sheet.

Reply:

The details of actual loan portfolio as on 1st April 2019 is provided in excel sheet attached as an annexure J.

20. The petitioner has claimed Bank/Finance Charges of Rs 0.05 Crore in revised petition. In this regard, the petitioner provide break-up of the same.

Reply:

The petitioner has claimed the bank/finance charges of Rs 0.05 cr in revised petition. However, providing documentary evidence for each and every bank and finance charges is a tedious task of collection of details from the fields. The detailed break up for the same is provided in attached annexure K.

21. The petitioner has claimed interest on consumer Security Deposit (CSD) as Rs.58.25 core in revised petition. However, as per audited accounts under note-16 the CSD mention in Rs 63.23 Crore. In this regard, the petitioner is required to remove discrepancy and submit the revised amount. Further, the petitioner is required to provide the details of actual disbursed to consumers against the above amount.

Reply:

It is requested to allow the interest on consumer security deposit of Rs 63.23 crores based on audited accounts for 2019-20. The actual disbursed amount to consumers is Rs 10.5 crores in 2019-20 as per audited accounts.

22. The Annexure-1 submitted by the petitioner in 1st Additional data requirement under point 19 is unreadable. Therefore, the petitioner to resubmit the Annexure in readable form.

Reply:

The annexure 1 submitted by the petitioner in 1st additional data requirement is submitted herewith as annexure L.

Business Plan and MYT for Control Period

23. The petitioner is required to submit actual consumer wise sales, connected load and no. of consumer for FY 2021-21 duly certified by the Energy auditor.

Reply:

JBVNL is submitting below the actual consumer sales, connected load and number of consumers for FY 20-21. The unit sold in 2020-21 is decreased as compared to 2019-20 due to COVID period and mandatory provisioning of power supply to medical emergency.

	FY 2020-21		
Category	Connected load(kW)	Effective Consumers	Units Sold (Units)
DS-1 (A)	825648.5	1351287	1063908995
DS-1 (B)	1266966	1883892	1969069297

DS-2	1150830	942701	1536509757
DS-3	333853	50789	311660726
NDS-1	30533.25	41259	64911894
NDS-2	475617.5	184950	592458819
NDS-3	14249	1750	19858701
LTIS	264500	14194	157659044
LTIS-D	36559	1449	40014059
IAS-1	55448.5	60131	148554839
IAS-2	870	564	1934699
SS-1	8058.75	366	40822408
SS-2	0	42	0
HT	801606	1805	1966042194
Total	5264739	4535179	7913405432

24. The Petitioner in 1st Additional data requirement reply under point -32 has submitted that the excel calculation for projection of sales, connected load and no. of consumers is attached in Annexure-N. However, it is observed that same is not attached. Therefore, the petitioner to resubmit the Annexure in workable excel along with all linkages and formula and any associated files linked for computation purpose.

Reply:

JBVNL would like to submit that it has submitted detailed basis and reasoning for projecting category wise number of consumers, connected load and Energy Sales from FY 21-22 to FY 25-26 in the sixth chapter of the Business Plan. The excel calculation for projection of sales, connected load and number of consumers is attached in annexure M.

25. The Petitioner is required to submit details of allocated existing stations as well as the new capacity additions which are expected to become operational during the control period as per the Annex 1.

Reply:

The details of the same is provided below:

Sr. No.	Generating Stations	Region	Installed Capacity (MW)	FY 2021-22		FY 2022-23		FY 2023-24		FY 2024-25	
				Allocation (%)	Allocation (MW)	Allocation (%)	Allocation (MW)	Allocation (%)	Allocation (MW)	Allocation (%)	Allocation (MW)
1	Farrakka		1600	9%	137.19	9%	137.19	9%	137.19		
2	Farrakka III		500	17%	84.742	17%	84.742	17%	84.742		
3	Khalagaon I		840	3%	26.921	3%	26.921	3%	26.921		
4	Talcher		1000	8%	76.7	8%	76.7	8%	76.7		
5	Khalagaon II		1500	1%	18.728	1%	18.728	1%	18.728		
6	Barh		1320	13%	172.74	13%	172.74	13%	172.74		

7	Korba		500	10%	50	10%	50	10%	50		
8	Darlipalli		1600	9%	147.52	9%	147.52	9%	147.52		
9	Kanti Power		390	3%	13.389	3%	13.389	3%	13.389		
10	Nabinagar		1980	2%	43.24	2%	43.24	2%	43.24		
11	Rangit		60	13%	8	13%	8	13%	8		
12	Teesta		510	12%	62.83	12%	62.83	12%	62.83		
13	Chukha		336	9%	29	9%	29	9%	29		
14	Tala		1020	11%	115.72	11%	115.72	11%	115.72		
15	KTPS		1000	60%	600	60%	600	60%	600		
16	TVNL		420	100%	420	100%	420	100%	420		
17	APNRL (IPP)		540	35%	188.85	35%	188.85	35%	188.85		
18	SECI		700	1%	10	1%	10	1%	10		
19	State IPPs		16	100%	16	100%	16	100%	16		
20	PTC		800	25%	200	25%	200	25%	200		
21	SECI		450	44%	200	44%	200	44%	200		
22	INLAND (IPP)		63	92%	58	92%	58	92%	58		
23	ABCIL (CPP)		60	0%	0	0%	0	0%	0		
24	Rungta Mines (CPP)				0		0		0		
25	SRHPS (Generation)		130	100%	130	100%	130	100%	130		
26	Karanpura (3x660) 1st unit		1980			25%	165				
27	Karanpura (2nd unit)		1980					25%	330		
28	PTPS		2400							85%	2040

26. The Petitioner is required to submit Generating station wise actual availability for FY 2020-21 in workable excel.

Reply:

The generating station wise actual availability for FY 2020-21 is provided in annexure N. It is requested to refer the annexure to find out generating station wise actual availability for FY 2020-21.

27. Further, the Petitioner is required to submit justification for consideration of 5% increase in power purchase cost for each generating stations except for renewable sources for each year of the control period.

Reply:

5% increase in power purchase cost for each generating station is in lieu of escalation of fuel charges and inflation component and as is provided historically for the tariff escalation for thermal power plants. Also, it is pertinent to mention that the central sector generating stations tariff has not been increased for last many years. The tariff has been set for MYT for 2014 to 2019 and it has been continuing since then. Tariff determination for 2024 is under process and considering the increase cost of coal, we

anticipate that for the upcoming control period , there will be some increase of the tariff for central generating stations. Hence, an increase of 5% has been considered.

28. The petitioner is required to submit whether it shall be able to meet RPO compliance against the RPO target approved by the commission for solar and non-Solar separately for each year of the Control Period as Regulation 5.2 of JSERC (Renewable Energy Purchase Obligation and its Compliance) (First Amendment) regulations.2021. Further, the Petitioner is required to Provide detailed power procurement plan to meet the RPO compliance and its cost.

Reply:

The JBVNL submits that it was unable to achieve the RPO Targets in FY 2019-20, FY 2020-21 and FY 2021-22 but to achieve the RPO targets in the future years, JBVNL is under process to procure the power from new renewable sources. However, in the estimates for FY 2021-22 and projections for FY 2022-23 JBVNL has considered the Power Procurement from Renewable sources based on which JBVNL will be able to achieve the RPO targets in the upcoming quarters.

Also, JBVNL is in the process of adopting solar rooftop programme from which it will get power from the prosumers in the state. Also, it has signed PPA with SECI for 100MW floating solar PV from Getalsud dam that will be operational soon with a competitive rate of INR 3.50 per unit. Also, JBVNL has signed a PPA for wind power (500MW)from SECI, from which it is getting power for 300MW. Once, the rest 200MW from SECI will be getting into the JBVNL system, it will be able to meet the non solar RPO targets for the coming years.

29. The petitioner has considered Distribution loss of 15% for each year of the control period. In this regard, the Petitioner shall submit rational and justification for consideration of Distribution loss of 15%.

Reply:

As far as the control period is considered, the JBVNL has considered a distribution loss of 15% over the control period. This has been done in consideration with the legacy distribution loss of JBVNL that hovers around 35%. It is a stiff target to get the distribution loss to 15% owing to the demographic and consumer profiling of the state where in around 85% of the consumers are from domestic category and from rural background. Owing to the difficulty faced to billing these consumers and collection, the target is set to be 15% normative over the control period. However, JBVNL would endeavour its best effort to further reduce distribution losses and would also share gains made from reduction in distribution losses with consumers

30. Further, the petitioner is required to submit actual distribution loss for FY 2020-21.

Reply:

The Hon'ble Commission has approved Distribution loss target of 13% for FY 2020-21. However, actual Distribution loss for FY 2020-21 is coming to be 35.34%. Non-

achievement of the loss target despite best efforts by the Petitioner is again due to addition of high number of rural domestic consumers.

As per audited accounts for 2020-21, the figures are provided below:

Computation of AT&C Loss for the F.Y 2020-21 on the basis of the new guideline from CEA

Sl No.	Particulars	Formula	Figures in Lacs
A	Gross Energy Purchased (KWH)		132,902
B	Transmission Losses (KWH)		10,514
C	Transmission Losses %		7.91%
D	Net Input Energy (KWH)		122,388
E	Total Units Sold (KWH)		79,134.05
F	Total Revenue from Sale of Energy including subsidy booked- Rs. 1356.61 Cr (INR)		524,497.61
G	Adjusted Revenue - (Adjustment of Revenue Grant-NIL, Subsidy booked Rs. 1356.16 Cr, Subsidy received Rs 1000 Cr) (INR)*		488,881.95
H	Opening Debtor for Sale of Energy - (INR)		718,518.13
i)	Closing Debtor for Sale of Energy - (INR)		730,516.75
ii)	Any write off - (INR)		-
I	Adjusted Closing Debtor - (INR)	(i + ii)	730,516.75
J	Collection Efficiency (%)	(G+H-I)/F	90.92%
K	Units Realised (KWH)	(E*J)	71,950.21
L	Units Unrealised (KWH)	D-K	50,437.79
M	AT & C Loss (%)	L/D	41.21%
N	*AT & C Loss (%) (considering 100% receipt of Subsidy)		36.82%

31. The petitioner are required to submit the actual inter- State transmission loss (52 Week region wise actual Inter-State transmission loss in percentage in a workable excel sheet) for FY 2020-21 and FY 2021-22.

Reply:

It is to mention that NLDC provides weekly transmission loss in its website. Getting those data in a workable excel sheet will be a cumbersome process. The actual inter state transmission losses is available in the POSOCO website.

The POSOCO has the region wise POC loss for each generating stations. But, calculation of inter state transmission losses would be a huge task as each generating station loss slab will be taken against the Jharkhand withdrawal losses and added upon to find the inter state transmission loss for that POC. Similarly, for all generating stations loss need to be calculated at the POC for Jharkhand region and then average out to find the average inter state transmission losses. Hence, all weekly sheets of transmission loss available on the POSOCO website are submitted for the kind consideration of the commission.

For FY 2020-21:

<https://posoco.in/side-menu-pages/applicable-transmission-losses/transmission-losses-2020-21/>

For FY 2021-22:

<https://posoco.in/side-menu-pages/applicable-transmission-losses/transmission-losses-2021-22/>

32. The Petitioner are required to submit the actual intra-State transmission loss of JUSNL in percentage for FY 2020-21 and FY 2021-22.

Reply:

In FY 20-21, although there are metering installation from the JUSNL side at the POC at JBVNL boundary, however some meters are defective in nature. Hence, it is difficult to provide actual intrastate transmission loss of JUSNL in percentage for FY 2020-21 based on actual metering data. It is requested to Hon'ble commission to consider the intra state transmission loss as per audited accounts of FY 2020-21. A snapshot of the same is provided below for reference. However, the meters are getting rectified or changed by the JUSNL in 2021-22. We are yet to ascertain the intra state transmission loss for FY 2021-22 as the accounts are not prepared yet.

Computation of AT&C Loss for the F.Y 2020-21 on the basis of the new guideline from CEA

Sl No.	Particulars	Formula	Figures in Lacs
A	Gross Energy Purchased (KWH)		132,902
B	Transmission Losses (KWH)		10,514
C	Transmission Losses %		7.91%
D	Net Input Energy (KWH)		122,388
E	Total Units Sold (KWH)		79,134.05
F	Total Revenue from Sale of Energy including subsidy booked- Rs. 1356.61 Cr (INR)		524,497.61
G	Adjusted Revenue - (Adjustment of Revenue Grant-NIL, Subsidy booked Rs. 1356.16 Cr, Subsidy received Rs 1000 Cr) (INR)*		488,881.95
H	Opening Debtor for Sale of Energy - (INR)		718,518.13
i)	Closing Debtor for Sale of Energy - (INR)		730,516.75
ii)	Any write off - (INR)		-
I	Adjusted Closing Debtor - (INR)	(i + ii)	730,516.75
J	Collection Efficiency (%)	(G+H-I)/F	90.92%
K	Units Realised (KWH)	(E*J)	71,950.21
L	Units Unrealised (KWH)	D-K	50,437.79
M	AT & C Loss (%)	L/D	41.21%
N	*AT & C Loss (%) (considering 100% receipt of Subsidy)		36.82%

33. As per clause 6.7 of MYT Distribution Regulations,2020, the Petitioner is required to provide the purpose of investment. DPR & Load Flow Analysis, Capital Structure, Capitalization Schedule , Implementation Schedule including timelines , Cost-benefit

analysis and Rate reasonability, etc. The Petitioner is required to comply the MYT Regulations and Provide the above said details.

Reply:

The purpose of investment by JBVNL is to strengthen the existing infrastructure in terms of operational efficiency so as to reduce the distribution loss by improving the MBC (Metering, Billing and Collection) activities. In order to cater the load growth and the addition of new consumers in the system, the state has kept aside budget apart from centrally sponsored scheme in the form of ADP budget. The overall purpose of these investments is to maintain the load growth and increased system demand as well as strengthening the existing system for more reliable power supply.

The load flow analysis is a critical segment of such planning. This is also required for strengthening and Augmentation of existing Electrical infrastructure in Urban and Rural Areas of Jharkhand State, electricity Access – Erecting new 33/11 KV PSS along with new 33KV, 11KV and LT Lines and providing service connection to new consumers including Govt. Schools, Gram Panchayat bhawan and primary health centers, system Strengthening & Capacity Augmentation – Adding additional capacity and augmentation of distribution system and facilitate existing consumers by augmenting the capacity of Power Transformers , operational Efficiency – Maintenance of Power Sub-Stations, 33 kV, 11 kV, LT Distribution line and Distribution Transformer , capacity Building and institutional strengthening – Training programs, workshops to enhance the internal capacity of employees. Provision for consultancy services, IT and Technology Interventions - IT services dependent new work like ERP, Video Conferencing, and Ease of Doing Services etc.

However, ‘Revamped Distribution Sector Scheme: A Reforms-Based and Results-Linked Scheme’ (RDSS) has been launched by Ministry of Power, Government of India with objective of improving the quality and reliability of power supply to consumers through a financially sustainable and operationally efficient distribution Sector. The Scheme aims to reduce the AT&C losses to pan-India levels of 12-15% and ACS-ARR gap to zero by 2024-25. In accordance to the scheme, Jharkhand Bijli Vitran Nigam Limited (JBVNL) has envisaged to implement the scheme in 24 districts under its electrical supply area. The administrative approval for a total project cost for Rs 9643.79Cr of RDSS Project has been approved and accorded by state Govt.

34. Further, the petitioner shall provide scheme (For each scheme separately) details in following manner:-
- a) Scheme Name
 - b) Scheme Cost
 - c) Purpose/Objective
 - d) Scheme details
 - e) Tentative BOQ
 - f) SLD/Diagram(If applicable)
 - g) How does this scheme impact area of supply
 - h) Benefits

- i) Whether this scheme has been approved by the Managing Director/Board. If not reason for the same.
- j) Capital structure of scheme
- k) Execution and capitalization plan
- l) Proposed financing Plan
- m) Improvement in Operational efficiency envisaged in the control period after implementation of the scheme.
- n) Details BOM and Costing
- o) Completion Schedule
- p) Cost Benefit analysis

Reply:

Under the RDSS scheme, the Scheme seeks to improve the operational efficiencies and financial sustainability of all DISCOMs/ Power Departments excluding Private Sector DISCOMs by providing conditional financial assistance to DISCOMs for strengthening of supply infrastructure. The assistance will be based on meeting pre-qualifying criteria as well as upon achievement of basic minimum benchmarks by the DISCOM evaluated on the basis of agreed evaluation framework tied to financial improvements. Implementation of the Scheme would be based on the action plan worked out for each state rather than a “one-size-fits-all” approach.

It is proposed that the currently ongoing approved projects under the Schemes of IPDS, DDUGJY would be subsumed in this Scheme. The details for the RDSS scheme along with its scheme details and cost , capitalisation structure and plan is provided in the annexure O.

The details for other schemes in 2020-21 are being collated and will be submitted shortly.

35. The petitioner is required to submit scheme wise computation of capital Expenditure Plan and Capitalization for each year of the Control Period in Workable excel sheet. Further, Funding of capital expenditure shall be submitted for each year of the control period in workable excel sheet as Tariff Regulation ,2020.

Reply:

Once the RDSS scheme is in place, all other schemes are subsumed under the RDSS scheme for the utility. The detailed plan outlaying the capital expenditure plan for the same is provided in annexure P.

36. The petitioner has not submitted Human Resource plan. Therefore, as per regulation 6.111 of Tariff Regulation,2020 the petitioner is required to submit Human Resource Plan for each year of the Control period detailing Manpower requirement and superannuating manpower. Further, the petitioner shall provide detailed justification of requirement of additional manpower of each year of the control period.

Reply:

The human resource plan for JBVNL is planned upto 2022-23. Due to financial constraints, JBVNL is hiring majorly contractual employees for operational works. It has man-power planning upto FY 22-23. And further planning for man power recruitment is not available with JBVNL for the rest of the control period (i.e) Fy23-24 ,FY 24-25 and FY 25-26. The same is attached herewith for reference.

Entry level position	Total proposed regular post	As-Is working Man power	Vacancy	first phase Recruitment(FY 18-19)	Second phase Recruitment(FY 19-20)	Third phase Recruitment(FY 20-21)	Fourth phase Recruitment(FY 21-22)	5th phase Recruitment(FY 22-23)
Manager(Accounts Cadre)	30	13	17	17	0	0	0	0
Manager(Technical Crade)	415	149	266	120	80	66	0	0
Manager (Law)	2	0	2	2	0	0	0	0
Manager(HR)	30	8	22	6	6	6	4	0
JM(Technical Cadre)	781	210	647	250	200	150	47	0
Office Assistant	672	144	528	196	150	121	61	0
Accounts Assistant	429	194	235	132	60	43	0	0
Technical Assistant	1150	795	355	0	150	120	85	0

37. The petitioner is required to submit details of existing manpower including contractual employees up to 31st March ,2020 and 31st March,2021 as per the following table given below,

Particulars	FY2019-20	FY2020-21	FY2021-22
Opening Manpower			
Less: Manpower Superannuating during the year			
Manpower additions during the year			
Closing manpower during the year			

Reply:

The details of existing man-power including contractual employees for FY 2019-20, FY 20-21 and FY 21-22 is provided below:

Particulars	FY2019-20	FY2020-21	FY2021-22
Opening Manpower	3613	3491	3436
Less: Manpower Superannuating during the year	128	91	75
Manpower additions during the year	6	36	18
Closing manpower during the year	3491	3436	3379

38. In Projection of Operation and maintenance, the Petitioner has not submitted the Base value computation for Employee Expenses, A&G Expenses and R&M Expenses. Further, K-factor computation for R&M Expenses has not submitted by the Petitioner. In this regard, the petitioner is required to submit computation of the same in workable excel.

Reply:

The base value computation for employee expenses, A&G expenses and R&M expenses and the K factor computation has been included in the working model for MYT petition submitted by the petitioner. The Hon'ble commission is requested to refer the working model submitted in the general gap annexure 1 as provided.

39. The petitioner is required to submit fixed Asset Register (FAR) considering depreciation rate in accordance with the provision of the Tariff Regulation,2020 for FY 2021-22 in a workable excel sheet. Further, the petitioner is required to submit the computation of depreciation in a workable excel sheet with all linkage in accordance with the provision of the Tariff Regulations.

Reply:

The JBVNL would like to submit that it does not have Fixed Asset Register as of now. The process to have a fixed asset register for the utility is under process. The computation of depreciation with all linkages in accordance with the providing of the tariff regulations has been provided in the working model submitted in the general gap annexure 1 .

40. The petitioner in 1st Additional data requirement reply under point-39 has submitted that it has attached the RGF letter no.4020 dated October 20,2017 in Annexure-R. However, it is observed that same is not attached. Therefore, the Petitioner to submit the same.

Reply:

The RGF letter no 4020 dated October 20,2017 is attached as an annexure Q to this document. (submitted in soft and hard copy)

41. The Petitioner in 1st Additional data requirement reply under point-42 has submitted that it is unable to submit the details in this regard. The petitioner is directed to submit the details duly certified by the Energy Auditor or Authorized officer of JBVNL.

Reply:

The Petitioner is required to provide year wise details of each consumer category (as approved by the Commission in its latest Tariff Order of JBVNL) for FY 2015-16 to FY 2019-20 duly certified by the Statutory Auditor. It is submitted that statutory auditors are appointed to audit the accounts and perform their statutory audit as per the Company Act. The information sought by Hon'ble Commission is for a past period when there was a different auditor than the present statutory auditor. Hence, certifying such data is neither in scope of work of present statutory auditor and the data also corresponds to a past period. Hence, JBVNL finds itself unable to submit the information as sought by Hon'ble Commission.

42. It is observed that the petitioner submission and compliance is not found satisfactory for the following directions of the commission issued in its earlier orders:
- a) Abolishment of unmetered category
 - b) Quality of power /Reliability Indices and Standard of Performance (SOP)
 - c) Strengthening of Distribution Network
 - d) Energy Audit & T&D Loss reduction plan
 - e) Interest on consumer Security Deposit
 - f) Quarterly Forecast of the Quantum of short-Term Power to be Purchased
 - g) Computation of SAIDI
 - h) Safety regulation Compliance
 - i) Monitoring of Compliance Directives
 - j) Employee Performance Appraisal

The petitioner should submit compliances to the above directions.

Reply:

- a) Abolishment of unmetered category: In compliance with the directives of the Hon'ble Commission, the Petitioner has made continuous efforts to remove the unmetered category and as such, only a few consumers remain unmetered in the JBVNL's database. Under ADP projects, JBVNL outsourced this activity to three different meter installation agencies to install meters for unmetered consumers and it is expected that there will be no unmetered consumers by the end of December 2022.
- b) Quality of power/reliability indices are being monitored internally by the JBVNL and interruption reports are being prepared as per the regulators' direction and is being maintained and shared as and when required by the regulator.
- c) After the introduction of Revamped Distribution Sector Scheme by MoP which aims to reduce the AT&C losses. The JBVNL has opted the Revamped scheme and the aforesaid works of the Discom will now come under this scheme and also the same has been approved by JBVNL BoD on 25 October 2021. It is expected that under the RDSS scheme opted by the JBVNL, the utility would strengthen the distribution network considerably. The above said works will help in reduction of T&D losses to a considerable level.

- d) Under the RDSS scheme, major emphasis is on the smart meter installation that will help in proper energy accounting for the utility. The smart meter installations will help billing efficiency considerably and thus, losses will be reduced considerably.
 - e) Interest on consumer security deposit is being paid to the consumer regularly in terms of adjusting their energy bills and the same is reflected in the annual account of the utility. The Licensee submits that it has paid the dues pertaining to interest on consumer security deposit. In case, any consumer left, will be provided interest as and when any request regarding the same will be received by the Licensee. Further, JBVNL is in the transition phase of transferring the data from one Billing Software Agency to another and after that the licensee will be able to get the actual amount of interest on consumer security deposit paid to consumers.
 - f) The licensee is in the process of forecasting the demand quarterly and plan its short-term power requirement judiciously so as to reduce the power purchase cost in the short term.
 - g) Safety protocol follow up is one of the major areas of human resource department of JBVNL. It has issued strict guidelines to be followed for the same to the field officials and communicate very often the same with all the lineman and other technical persons.
 - h) The JBVNL humbly submits that it has implemented performance appraisal for its employees and regularly working on the same.
 - i) All other points under compliances are being followed strictly in JBVNL to comply with JSERC directive and more so, improving the operational and functional performance of the discoms.
43. The petitioner should submit the details of consumer category wise revenue from fixed charges, variable charges, rebates (Separate head for each) , surcharge (Separate head for each) for FY 2020-21 and FY 2021-22 along with proper formulae and linkages in workable excel detailing the ABR for each category of consumer.

Reply:

The details of consumer category wise revenue from fixed charges, variable charges, rebates (separate head for each) for FY 2020-21 along with proper formulae and linkages in workable excel detailing the ABR for each category of consumer is provided as an annexure R.

Provisional accounts for FY 2021-22 is under finalisation and same will be submitted shortly.