

UTTARAKHAND ELECTRICITY REGULATORY COMMISSION

‘Vidyut Niyamak Bhawan’, Near I.S.B.T., P.O.-Majra, Dehradun-248171

Dated: September 14, 2018

UERC (Terms and Conditions for Determination of Multi Year Tariff) Regulations, 2018

Statement of Reasons

1. The Uttarakhand Electricity Regulatory Commission had notified the UERC (Terms and Conditions for Determination of Tariff) Regulations, 2015 (hereinafter referred to as “previous Regulations”). The Tariff Regulations, 2015 governs all matters relating to filing and determination of tariff for the utilities. These regulations had a control period of three financial years, i.e. April 1, 2016 to March 31, 2019. The Commission issued the draft tariff Regulations for the ensuing control period inviting comments/objections/suggestions on the same from the stakeholders. Last date of submission of comments/objections/suggestions was 30.05.2018. Comments/suggestions/objections received by the Commission have been duly analysed before considering them or rejecting the same. A copy of the draft Regulations was also sent to the members of the State Advisory Committee for seeking their comments/objections/suggestions on the same.
2. The Commission also held a public hearing on 29.06.2018 to facilitate oral submission of the stakeholders and other interested persons. The comments/objections/suggestions of the stakeholders have been considered by the Commission while finalizing the Regulations. List of stakeholders who submitted comments on draft notification is enclosed at **Annexure-I**. List of participants who attended the hearing is enclosed at **Annexure-II**.
3. The Statement of objects and Reasons is being issued with the intent of explaining the rationale which went into finalisation of Tariff Regulations, 2018. However, in case of any deviation/discrepancy in the SOR with respect to Tariff Regulations, 2018 the provisions of Tariff Regulations, 2018 shall be applicable. The comments/suggestions/objections received from the stakeholders and the views of the Commission on the same are discussed in subsequent paragraphs.
4. Suggestions and objections of stakeholders and the Commission’s views thereon:

4.1 Sub-regulation (25) of Regulation 3, definition of "Design Energy".

In the draft Regulation, Design Energy has been defined as:

"Design Energy" means the quantum of energy which can be generated in a 90% dependable year with 95% installed capacity of the hydro generating station".

Stakeholders Comments/Suggestions

4.1.1 M/s GBHPPL has proposed that the definition of Design Energy in the tariff regulation should have a provision of adjustment due to any statutory or un-controllable factors.

Commission's View

4.1.2 The same terminology was in vogue in the previous Regulations also. The suggestion put forth by M/s GBHPPL is not being accepted. It is also worthwhile to mention here that the applicant in its Petition is always at liberty to bring out new facts before the Commission because of which their operations gets affected and after the prudence analysis of the same if the Commission finds the same to be justifiable then necessary allowance can be given on case to case basis.

4.2 Sub-regulation (3) of Regulation 35, definition of "Force Majeure Event".

4.2.1 In the draft regulation, following has been proposed:

"Force Majeure Event" means, with respect to any party, any event or circumstance which is not within the reasonable control of, or due to an act or omission of, that party and which, by the exercise of reasonable care and due diligence, that party is not able to prevent, including, without limiting the generality of the foregoing:

- a) Acts of God like lightning, landslide, storm, action of the elements, earthquakes, flood, drought and natural disaster or exceptionally adverse weather conditions;*
- b) Any act of public enemy, wars (declared or undeclared), blockades, embargo, insurrections, riots, revolution, sabotage, terrorist or military action, vandalism and civil disturbance;*
- c) Unavoidable accident, fire, explosion, radioactive contamination and toxic dangerous chemical contamination;*
- d) Any shutdown or interruption of the grid, which is required or directed by the State or Central Government or by the Commission or the State Load Despatch Centre; and any shut down or interruption, which is required to avoid serious and immediate risks of a significant plant or equipment failure;"*

Stakeholders Comments/Suggestions

- 4.2.2 PTCUL submitted that while execution of projects, often inordinate delay occurs in getting approval of forest clearance case, which is beyond the control of the transmission Licensee and, therefore, it requested and proposed that the delay which is beyond the control of the Transmission Licensee should be incorporated/considered under the definition of 'Force Majeure Event'.
- 4.2.3 M/s SEPL & M/s GIPL submitted that gas supply constraint such as clogging, gas line pigging, reduced gas pressure, gas line damage/burst etc. on the part of GAIL/Supplier, restrictions on contracted supply due to unforeseen circumstances on the part of GAIL/Supplier etc. be included as force majeure.

Commission's View

- 4.2.4 With respect to the comments of the stakeholders, the Force Majeure Event as provided in the Regulations means any event or circumstance which is not within the reasonable control of, or due to an act or omission of, that party and which, by the exercise of reasonable care and due diligence, that party is not able to prevent. Thus, as per the definition, force majeure event is an uncontrollable event which is used normally during the truing up exercise. The parties claiming the same would be required to justify/establish the efforts made by them to prevent the occurrence of such events during the truing up exercise, accordingly, the Commission is of the view that the definition does not require any modification.

4.3 Sub-regulation (51) of Regulation 3, i.e. Definition of "Maximum Continuous Rating".

In the draft regulation, following has been proposed:

"Maximum Continuous Rating" or 'MCR' in relation to a unit of the thermal generating station means the maximum continuous output at the generator terminals, guaranteed by the manufacturer at rated parameters, and in relation to a Block of a combined cycle thermal generating station means the maximum continuous output at the generator terminals, guaranteed by the manufacturer with water or steam injection (if applicable) and corrected to 50 Hz grid frequency and specified site conditions;"

Stakeholders Comments/Suggestions

- 4.3.1 M/s GIPL has proposed that in the definition words "guaranteed by the

manufacturer”, should be replaced by “guaranteed by the OEM/EPC contractor” since EPC contractor combines/integrates all the modules supplied by OEM to form CCPP and every module has different performance at various site conditions.

- 4.3.2 M/s SEPL has proposed that definition of design heat rate may also be included in the Regulations as follows:

“Design heat rate of a unit shall mean guaranteed heat rate provided by OEM/EPC contractor. Since EPC contractor integrates plant modules supplied by different OEM with different performance parameters at various site conditions.”

Commission’s View

- 4.3.3 Both gas based generators are mixing up the issue of guaranteed heat rate with the guaranteed Maximum Continuous Rating (MCR). While guaranteed heat rate can be for any one of the constituents of the thermal cycle namely Gas turbine, HRSG/Boiler & Steam turbine and also there can be an overall guaranteed heat rate of the station as a whole. On the other hand, MCR or Maximum Continuous Rating of an equipment/generator is guaranteed by its manufacturer subject to various conditions. Hence, there are no justified reasons to modify the definition of MCR.

4.4 Sub-regulation (77) of Regulation 3, i.e. Definition of “Transmission Loss”.

It has been defined as the energy losses in the transmission system of a Transmission Licensee. Cost of auxiliary power consumption in the sub-station for the purpose of air-conditioning, lighting, battery charging, accessories of sub-station equipments, etc.;

Stakeholders Comments/Suggestions

- 4.4.1 UPCL submitted that the auxiliary consumption should not be allowed from the power being transmitted by the transmission licensee, therefore, the definition should be amended as follows:

“Transmission Loss” means the energy losses in the transmission system of a Transmission Licensee. Auxiliary power consumption in the sub-station for the purpose of air-conditioning, lighting, battery charging, accessories of sub-station equipments, etc shall not be part of Transmission Loss and be consumed out of power supplied by distribution licensee through meter. Cost of the auxiliary consumption shall be booked in the Repairs and Maintenance Expenses.

Commission's View

4.4.2 The provisions of the Regulation 61 of the existing regulations already specifies that the charges for auxiliary energy consumption in the AC sub-station for the purpose of air conditioning, lighting, consumption, etc. shall be borne by the Transmission Licensee and included in the normative operation and maintenance expenses. Therefore, the second sentence pertaining to auxiliary power consumption in the definition of Transmission loss in the existing regulations has no relevance in the manner it is provided therein. Hence, definition of Transmission loss is modified to be read as under

“Transmission Loss” means the energy losses in the transmission system of a Transmission Licensee.”

4.5 Sub-regulation (5) of Regulation 12 in respect of “Uncontrollable factors”.

12. Annual Performance Review

...

(5) The “uncontrollable factors” shall include such of the factors which are beyond the control of, the applicant, as determined by the Commission. Some examples of uncontrollable factors are as follows:

- (a) Force Majeure events, such as acts of war, fire, natural calamities, etc.;*
- (b) Change in law, judicial pronouncements and Orders of the Central Government, State Government or Commission;*
- (c) Economy wide influences such as unforeseen changes in inflation rate, market interest rates, taxes and statutory levies;*
- (d) Variation in power purchase expenses for the Distribution Licensees etc.;*
- (e) Variation in freight rates;*
- (f) Variation on account of change in hydro-thermal mix due to adverse natural events; and*
- (g) Variation in number or mix of consumers or quantities of electricity supplied to the consumers.*
- (h) Primary fuel cost.”*

Stakeholders Comments/Suggestions

4.5.1 M/s SEPL & M/s GIPL have proposed that uncontrollable factors should include gas supply constraint such as clogging, gas line pigging, reduced gas pressure, gas line damage/burst, restrictions or interruptions on gas supply, which impacts generations but are not in control of generator.

Commission's View

4.5.2 With regard to the suggestion put forth by M/s SEPL & M/s GIPL to include gas supply constraint such as clogging, gas line pigging, reduced gas pressure, gas line damage/burst, restrictions or interruptions on gas supply under uncontrollable factors, the Commission has dealt with the same at Para 4.2.4 above and is not reiterating the same. Hence, no change in this regard is being incorporated in the Regulations.

4.6 Sub-regulation (6)(f) of Regulation 12 in respect of "Controllable factors".

In the draft regulation variation in working capital requirement has been categorized as controllable factors.

Stakeholders Comments/Suggestions

4.6.1 UJVN Ltd. submitted that in case the prompt payments are made by distribution licensee due to allowance of rebate, the requirement of working capital decreases (and consequently the interest on working capital too) but for this reduction in interest on working capital the generating company has to pay to the distribution licensee in the form of sharing of gain. UJVN Ltd. proposed that variation in working capital requirements should be excluded from controllable factors and no sharing of gain/loss be carried out for the same.

Commission's View

4.6.2 The interest on working capital allowed under the Regulations is normative and it does not signify that, whether any actual expenditure under this head is incurred or not, the beneficiary shall be entitled for the same. The IWC allowed under the Regulations is not a source of earning rather it is provided to meet the actual expenses that the utility might have to incur for smooth operations of the business. Further, the sharing is carried to encourage the utility to plan its requirement of funds in an optimum manner so that the consumers are not unnecessarily burdened due to inefficiencies of the utility. If the utility is not incurring any expenditure as working capital then it cannot be contested that they are entitled for normative working capital in full, as it is not a source of income, however, as an incentive a part of gain is passed on to the utility as a reward for their efficiency. In view of above, the submission of UJVN Ltd. that they are at loss due to sharing of IWC is not maintainable. Hence, no change in this regard is incorporated in the Regulations.

4.7 Sub-regulation (6)(i) of Regulation 12 in respect of “Controllable factors”.

In the draft regulation variation in quality of supply has been categorized as controllable factors.

Stakeholders Comments/Suggestions

- 4.7.1 M/s GIPL submitted that variation in quality of supply is uncontrollable factor for gas based generators as firming a contract on availability of gas is controllable but what quality of supply is actually received is uncontrollable, hence it requested that said clause be modified for gas based generators and be covered as uncontrollable factor.

Commission’s View

- 4.7.2 The quality and quantity of supply is more of a commercial arrangement that can be instilled upon the supplier. There is no merit in stating the same as uncontrollable and any variation in quality of supply should be settled between the buyer and supplier amongst themselves as a prudence business practice. Further, as detailed in Para 4.2.4 above, the utility during the truing up exercise has to demonstrate as to how any claim can be classified as controllable or uncontrollable. Hence, the Commission does not accept the change proposed in this regard by M/s GIPL.

4.8 Sub-regulation (7) of Regulation 21 in respect of Capital Cost and Capital Structure.

Proviso to the draft regulation in this regard states as under:

“Provided further that if the generating station is not commissioned on the SCOD or actual COD whichever is later of the associated transmission system, the generating company shall bear the IDC and IEDC or transmission charges if the transmission system is declared under commercial operation by the Commission in accordance with second proviso of Clause (c) of sub-Regulation (20) of Regulation 3 of these Regulations till the generating station is commissioned; Provided also that if the transmission system is not commissioned on SCOD of the generating station, the transmission licensee shall arrange the evacuation from the generating station at its own arrangement and cost till the associated transmission system is commissioned.”

Stakeholders Comments/Suggestions

- 4.8.1 UJVN Ltd. submitted that from the two conditions of the Regulation 21(7) it appears that these are discriminatory in favour of Transmission licensee. If Generation Company fails to commission power station within SCOD it has to pay transmission

charges, but if transmission licensee fails to commission transmission system within SCOD it will arrange for alternate arrangement. However, in most of the cases Transmission licensee might not be in position to make alternate arrangement as most of the Hydro Power Plants are located in remote areas and the possibility of being able to make alternate arrangement are very less. Therefore, Transmission Licensee should pay amount equal to Annual Fixed Charges of the Plant considering the power plant is generating up to design energy; Or IDC and IEDC is allowed by the Commission as capital cost till transmission licensee make arrangement and RoE should be paid by Transmission licensee to Generating Company for default period.

Commission's View

4.8.2 In this regard, the Commission is of the view that the generators are advised to discuss the issue with the transmission licensees and enter into an agreement specifying the liability of either parties in case of delay in construction of evacuation infrastructure where the generating station is ready for commissioning and vice versa. Further, while determining the tariffs if the Commission finds that CoD of the generator gets delayed resulting in increase in IDC or IEDC due to uncontrollable factors, wherein one factor may be non-availability of evacuation infrastructure, the Commission may allow the same subject to prudence check. The same would apply mutatis mutandis on delay in CoD of transmission system due to delay of commissioning of generator. Accordingly, suggestion of UJVN Ltd. is not accepted.

4.9 Sub-regulation (11) of Regulation 21 in respect of "Initial Spares".

Sub-regulation (11) of Regulation 21, specifies as follows:

"Initial Spares: Initial spares shall be capitalized subject to the following ceiling norms as a percentage of the Plant and Machinery cost as per actuals upto the cut-off date:

- (i) Thermal generating stations - 4.0%*
- (ii) Hydro generating stations - 4.0%*
- (iii) Transmission System*
 - (a) Transmission line - 1.00%*
 - (b) Transmission Sub-station - 4.00%"*

Stakeholders Comments/Suggestions

- 4.9.1 M/s SEPL & M/s GIPL submitted that their generating plants have been revived after being stranded for more than 3 years and due to cash crunch and huge burden of debt service they had led to delay procurement of initial spares. Hence, capitalization of initial spares during next control period may be allowed.

Commission's View

- 4.9.2 The Commission is of the view that this matter being a case specific issue, cannot be incorporated as a part of Regulation. The gas based generators i.e. M/s SEPL & M/s GIPL are advised to bring out this issue at the time of Tariff filing and the same shall be dealt with accordingly, after prudence analysis of the same. Hence, no change is being made in the Regulations.

4.10 Sub-regulation 2(e) of Regulation 22 in respect of Additional capitalization and De-capitalization.

Sub-regulation 2(e) of Regulation 22 states as under:

“(2) The capital expenditure of the following nature actually incurred after the cut-off date may be admitted by the Commission, subject to prudence check:

...

(e) Any additional capital expenditure which has become necessary for efficient operation of generating station or transmission system as the case may be. The claim shall be substantiated with the technical justification duly supported by the documentary evidence like test results carried out by an independent agency in case of deterioration of assets, report of an independent agency in case of damage caused by natural calamities, obsolescence of technology, up-gradation of capacity for the technical reason such as increase in fault level;”

Stakeholders Comments/Suggestions

- 4.10.1 UJVN Ltd. submitted that the draft Regulation 22(2)(e) requires that the claim of additional capital expenditure shall be substantiated by a report or result carried by an independent agency. The process of obtaining reports/test results from independent agency takes its own time and thus creates unnecessary delay in carrying out works in power stations. Any delay in works in power stations may also lead to non-availability of machines for generation and ultimately result in loss to the generator. UJVN Ltd. further stated that here it is pertinent to mention that in most of the cases the engineers

of the generating companies are capable enough to assess the deterioration of assets on the basis of operational and performance records. Further, the cost of consultancy for the reports and tests results would substantially increase the final cost of the additional capital works which has become necessary for efficient operation of generating station. In view of expected time delay in execution of work & additional cost burden on account of hiring independent agency, UJVNL requested to incorporate suitable amendments in said regulation 22(2)(e) for additional capitalization.

Commission's View

4.10.2 In this regard, the Commission is of the view that the requirement for having technical justification based on test results carried out by an independent agency in case of deterioration of assets, report of an independent agency in case of damage caused by natural calamities, obsolescence of technology, up-gradation of capacity for the technical reason such as increase in fault level etc., has been made with a view to maintain transparency in the process and in many cases where sophisticated technologies are involved this becomes a mandatory requirement. Similar provision was prevalent in the MYT Regulations, 2015 as well. Moreover, time and cost involved in getting these formalities is part and parcel of the business operations of the entity and cannot be done away without any substantial reason. Hence, no change is required to this suggestion of UJVN Ltd.

4.11 Sub-regulation (3) of Regulation 27, in respect of interest and finance charges on loan capital and security deposit.

In the draft regulation, Regulation 27(3) provides that:

"27. Interest and finance charges on loan capital and on Security Deposit

.....

(3) The repayment for each year of the Control Period shall be deemed to be equal to the depreciation allowed for that year. In case of decapitalization of assets, the repayment shall be adjusted by taking into account cumulative repayment on a pro rata basis and the adjustment should not exceed cumulative depreciation recovered upto the date of decapitalization of such asset.

....."

Stakeholders Comments/Suggestions

4.11.1 PTCUL submitted that while carrying out the true-up of the previous financial year the

repayment of loan is considered/ approved to be equal to the normative depreciation of that financial year in line with the prevailing UERC (MYT) Regulations, whereas the actual repayment of loan often exceeds the normative depreciation calculated as per the prevailing Regulations. Hence, it is requested and proposed before the Commission to make such amendment in the Clause 27 (3) i.e. Interest and Finance Charges on loan capital and on Security Deposit so that the actual repayment of loan should be allowed since this has significant financial impact on the health of PTCUL in the form of disallowed repayment of loan.

Commission's View

4.11.2 In this regard, the Commission would like to state that the interest on loan is calculated on the average outstanding balance at the end of the year after reducing the normative repayment of loan. PTCUL has submitted that the actual loan repayment instead of normative repayment should be considered as the same is higher than the normative repayment as per the Regulations. In that case if contention of PTCUL is accepted then the same would lead to loss to PTCUL on account of less amount being allowed as interest on loan capital, as the average closing balance for the purposes of calculation of interest on loan capital will reduce due to higher repayment as proposed by PTCUL. In this regard, PTCUL is advised to reschedule the loan terms with the financial institutions so as to get the loan tenure increased. Hence, no change is required to this suggestion of PTCUL.

4.12 Sub-regulation 1 of Regulation 30 and Sub-regulation 2(d) of Regulation 48, in respect of operation and maintenance expenses.

The draft Regulation 30(1) states that O&M expenses shall comprise of expenses incurred on manpower, repair & maintenance (R&M) and administrative and general expenses, including insurance expenses.

Stakeholders Comments/Suggestions

4.12.1 UJVN Ltd. submitted that in the Regulation 22 (2) (f) of Draft Tariff Regulations, 2018, insurance is mandatory for operating a hydro power station. Therefore, it should be considered as separate item in addition to O&M expenses and not as a part of Administrative and General Expenses. Further, Regulatory fee may also be considered as separate item in addition to O&M expenses. Therefore, the said provision 30(1) may

kindly be amended as below in draft UERC Tariff Regulations, 2018:

“30(1)

Operation and Maintenance or O&M expenses shall comprise of expenses incurred on manpower, repair & maintenance(R&M), administrative and general expenses, insurance expenses and Regulatory fee.

Accordingly, the formula for O&M approval specified in Regulation 48 (2) (d) of Draft UERC Tariff Regulations, 2018 may kindly be modified as below:

O&M_n = R&M_n + EMP_n + A&G_n + Insurance Exp. (Actual) + Regulatory Fee (Actual)”

Commission’s View

4.12.2 In this regard the Commission would like to state that Regulation 22(2)(f) of draft MYT Regulation 2018 provides that any additional expenditure which has become necessary on account of damage caused by natural calamities (but not due to flooding of power house attributable to the negligence of the generating company) would only be allowed if appropriate and adequate insurance cover was available at the time of occurrence of natural calamities referred to above. Therefore, the submission of UJVN Ltd. that insurance is mandatory for a Hydro Plant is true as it is a pre-requisite for claiming additional expenditure incurred due to happening of any natural calamity or other factors as discussed in the Regulations. Further, the Commission has been allowing the normative cost for meeting operational expenses of the entity that includes amount towards insurance cost also. However, considering the topography of the State of Uttarakhand and also the need of the hour for capital intensive businesses to be insured against any unforeseen events, the Commission is of the view that insurance has become a major part of the operational expenses of the entities. Further, the cost of insurance is rising day by day and cannot be projected accurately on normative basis as the same is dependent on various factor including but not limited to additions in the asset base of the company, insured value, location of asset, etc. Moreover, with regard to Regulatory fees, the Commission has been allowing the same on actual basis in the ARR of the Petitioners, although the same has not been mentioned explicitly under the Regulations. Accordingly, UJVN Ltd. is advised to bring this issue separately in the ARR proceedings and the Commission will take appropriate view on the same. No change is warranted in the Regulations to this effect.

4.13 Sub-regulation (2) of Regulation 33, in respect of interest on the estimated level of working capital for Distribution Licensee.

In the draft regulation, Sub-regulation (2) of Regulation 33 deals with computation of interest on working capital for Distribution Licensee.

Stakeholders Comments/Suggestions

4.13.1 UPCL submitted that in the mechanism given in the draft Regulations, the time value of money is ignored in respect of equity invested in Asset during construction period. Further, as per the provisions of the Accounting standards, interest/return on equity capital during construction period of the Asset also cannot be capitalized. Therefore, the time value of money/opportunity cost of the equity invested in Asset during construction period should be allowed as interest on working capital under the MYT Regulations and necessary clause be included in the regulations to that effect.

Commission's View

4.13.2 The suggestion proposed by UPCL in this regard is not accepted by the Commission. UPCL is making claim for allowance of opportunity cost of equity invested in creation of assets during the construction period, however it should also be understood that had the same money be kept in term deposits resulting in interest income (i.e. opportunity cost), then the same would have been reduced from the ARR of the Licensee in the form of Non-Tariff income. Therefore, in actual terms there is no loss to UPCL on that account. Moreover, return on equity investment and IDC cannot be compared hands-in hand as IDC is an obligation whereas return on equity is expected return that the asset might generate after commissioning. Moreover, there doesn't exist any accounting practice or principle where expected return on equity is treated as notional income of the entity on advance basis. As stated by UPCL, Accounting Standards also do not allow for notional opportunity cost to be part and parcel of the asset, therefore, there exists no ground to accept the proposal made by UPCL. Hence, the proposal of UPCL in this regard is not accepted by the Commission.

4.14 Sub-regulation 1(b) of Regulation 47, in respect of NAPAF.

In the draft regulation, sub-regulation 1(b) specifies as under:

“For existing hydro generating stations:

The trajectory for NAPAF fixed by the Commission in case of existing hydro generating stations,

in the preceding Control Period would continue to be applicable. However, the NAPAF of the stations undergone RMU would be adjusted accordingly, considering the impact of RMU."

Stakeholders Comments/Suggestions

4.14.1 UJVN Ltd. submitted that as per the draft Regulations the trajectory for NAPAF fixed by the Commission in case of existing hydro generating stations, in the preceding Control Period would continue to be applicable. There may be the case where the trajectory fixed by the Commission for preceding control period was not achieved by the power stations due to problems specific to the power station and those are beyond the control of Generating Company, such as low discharge in river/pondage vis-à-vis that envisaged in DPR, excessive silt content in river, public unrest, non-completion of capital works necessary to achieve installed capacity of the power station etc. Further, this non achievement of NAPAF may have already resulted in substantial loss to the generating company due to non-recovery of capacity charges in last many years. Therefore, for such cases the Commission is requested to incorporate suitable amendment to said clause 47(1) (b) for considering the revision of NAPAF for next control period.

Commission's View

4.14.2 The Commission vide its Tariff Order dated May 06, 2013 had approved the NAPAF of UJVN Ltd. generating stations, in accordance with Regulations 51 of UERC Tariff Regulations, 2011. Thereafter, UJVN Ltd. had filed the review Petition seeking relaxation in NAPAF for its 9 LHPs. In that Petition, UJVN Ltd. had submitted that LHPs face problems during rainy season in terms of flood pass, high PPM content, silt problem, flushing and choking, etc., since river carries heavy trash, debris and high concentration of silt during monsoon season thereby restricting the operations of the plant significantly resulting in appreciable reduction of plant availability. As a result, there is forced shutdown. Accordingly, the Commission vide Review Order dated September 3, 2013 had re-fixed NAPAF of 9 LHPs. Further, in the Tariff Petition for FY 2015-16, the UJVN Ltd. had also requested to relax the NAPAF norms for its MB-I, Chilla, Ramganga and Khatima LHPs due to natural calamity. However, the Commission vide Tariff Order dated 11.04.2015 observed that UJVN Ltd. could not provide the appropriate justification for its revised projections of NAPAF, further, the Commission also held that it cannot again review the Order passed by it on the Review

Petition. Accordingly, the Commission decided to continue with the same provision as proposed in the Regulations. Further, sufficient time period was available to analyze the shortcomings in the projects which are leading to reduced availability and to work upon towards their improvements. However, no steps have been taken by UJVN Ltd. in this regard and it is again reiterating its submissions made earlier. UJVN Ltd. is advised to submit proper justification for non-achievement of NAPAF and other controllable elements at the time of truing up.

Hence, no change in the Regulation is being made.

4.15 Sub-regulation (3) of Regulation 47, in respect of Gross Station Heat Rate for Gas-based/Liquid-based thermal generating unit(s).

In the draft regulation, Regulation 47(3) specifies as under:

Gross Station Heat Rate for Gas-based/Liquid-based thermal generating unit(s)

= 1.05 X Design Heat Rate of the unit for Natural Gas and RLNG (kcal/kWh)

= 1.071 X Design Heat Rate of the unit for Liquid Fuel (kcal/kWh)

Where the Design Heat Rate of a unit shall mean the guaranteed heat rate for a unit at 100% MCR and at site ambient conditions; and the Design Heat Rate of a block shall mean the guaranteed heat rate for a block at 100% MCR, site ambient conditions, zero percent make up, design cooling water temperature/back pressure.

..."

Stakeholders Comments/Suggestions

4.15.1 M/s SEPL proposed the following computation for Gross Station Heat Rate for Gas-based thermal generating unit(s):

=1.08 X design heat rate of the unit for natural gas and RLNG (Kcal/Kwh).

M/s SEPL further submitted that various factors affecting heat rate are:

1. Degradation of machines - 2.0%
2. Site temperature variations, filter DP due to dust, relative humidity, Exhaust DP, vacuum of ACC, Frequency - 3.5%
3. Start-up and shutdown (1 or 2 Start -ups) - 2.5% Total= 8.0%

Commission's View

4.15.2 The Commission is already in the process of establishing the GSHR for the gas based

generators namely M/s SEPL & M/s GIPL. Hence, at present no change is required in the proposed Tariff Regulations.

4.16 Sub-regulation (4) of Regulation 47, in respect of “Auxiliary Energy Consumption”.

In the draft regulation, Regulation 47(4) defines percentage of auxiliary energy consumption for generating stations having different technologies.

Stakeholders Comments/Suggestions

4.16.1 M/s GIPL submitted that said clause has clearly specified auxiliary energy consumption for combined cycle generating stations and open cycle stations but there is no provision for combined cycle power plants with load operations, i.e. 50% of installed capacity of 214 MW equals to 107 MW. Hence the Commission was requested to incorporate auxiliary energy consumption for part load to be upto 3% considering the auxiliary energy consumption of M/s GIPL which is approximately equivalent to 2.8%.

Commission’s View

4.16.2 The proposal of M/s GIPL in this regard does not warrant any need to revise the norms set out in the Regulations, as the same being a specific case might not be applicable evenly on other generators due to specific site conditions, requirement etc. and therefore will not serve any purpose as such. The percentage of auxiliary consumption proposed by M/s GIPL for their plant running on part load is case specific and requires prudent analysis based on facts and figures and, therefore, the generator is advised to bring the matter for consideration of the Commission in its next Tariff filing. Hence, proposed revision on this account is not being considered.

4.17 Sub-regulation (2)(a) of Regulation 48, in respect of “Operation and maintenance expenses for Hydro Generating Stations”.

In the draft regulation, Regulation 48(2)(a) specifies as under:

“48. Operation and maintenance Expenses

.....

(2) For Hydro Generating Stations

(a) For Generating Stations in operation for more than five years preceding the Base Year

The operation and maintenance expenses for the first year of the control period will be

approved by the Commission taking in to account the actual O&M expenses for last five years till base year, based on the audited balance sheets, excluding abnormal operation and maintenance expenses, if any, subject to prudence check and any other factors considered appropriate by the Commission.

.....”

Stakeholders Comments/Suggestions

4.17.1 M/s UJVN Ltd. submitted that in the proposed regulation the determination of O&M expenses for the base year is done by the Commission taking into account the actual O&M expenses for last five years till base year. It was also submitted that the method of taking actual O&M expenses for last five years till base year is insufficient for very old generating stations which are in operation for more than 35 years or more than normative operating life. These old power stations require more O&M expenses which are transient in nature due to ageing of machines and other equipment. Therefore, for the power plants which are in operation for more than 35 years period, the determination of O&M expenses should be done separately on different basis providing separate regulation, keeping in view the R&M requirements of very Old Power Plants. For this UJVN Ltd proposes an additional multiplying factor of 1.5 while determining R&M expenses as per formula provided in Regulation 48(2)(d) for base year for plants in operation for a period more than 35 without RMU.

Commission's View

4.17.2 In this regard the Commission is of the view that the proposal of multiplying factor of 1.5 made by UJVN Ltd. has no basis as the same is not backed by any facts and figures. UJVN Ltd. should understand that amendments in the Regulations cannot be made without establishing the need and efficiency of the proposed amendments and merely stating that multiplying factor of 1.5 should be used without explaining the reason for the same, has no merit. Moreover, the contention of UJVN Ltd. that average actual O&M expenses for past 5 years is not a sufficient basis is also not acceptable, as the years that might be considered for arriving at average expenses are most likely to represent the current situation and requirements of the plant and average itself mathematically covers the abnormal variations over the years. Hence, no change in the Regulation is required in this regard.

4.18 Sub-regulation (2)(b) of Regulation 48, in respect of “O&M expenses of HEPs”.

Regulation 48(2)(b) provides for O&M expenses of generating station in operation for less than five years as under:

In case of the hydro electric generating stations, which have not been in existence for a period of five years preceding the base year, i.e. FY 2017-18, the operation and maintenance expenses for the base year of FY 2017-18 shall be fixed at 2.0% of the capital cost as admitted by the Commission for the first year of operation and shall be escalated from the subsequent year in accordance with the escalation principles specified in clause (e) below.

Stakeholders Comments/Suggestions

4.18.1 UJVN Ltd. submitted that the base year in draft regulation is 2017-18 and any Generating station commissioned in FY 2016-17 will come under this clause and therefore the O&M charges will be allowed as 2% of capital cost. However in view of existing regulations these power stations shall be getting 4% or 2.5% of the actual capital cost as O&M depending on capacity of power station (<200 MW or > 200 MW). This will reduce the O&M expense drastically for generating stations installed in FY 2016-17.

Commission’s View

4.18.2 In this regard, the Commission agrees with the submission of UJVN Ltd. and accordingly modifies the proposed draft Regulations. The Regulation 48(2)(b) shall be read as:

“(b) For Generating Stations in operation for less than 5 years preceding the base year:

In case of the hydro electric generating stations, which have not been in existence for a period of five years preceding the base year, i.e. FY 2017-18, the operation and maintenance expenses for the base year of FY 2017-18 shall be fixed at 4% and 2.5% of the capital cost as admitted by the Commission, for stations less than 200 MW projects and for stations more than 200 MW respectively, for the first year of operation and shall be escalated from the subsequent year in accordance with the escalation principles specified in clause (e) below.”

4.19 Sub-regulation (2)(d) of Regulation 48, in respect of “O&M expenses of HEPs”.

Regulation 48(2)(d) specifies as under:

“(d) Post determination of base O&M Expenses for the base year, i.e. FY 2017-18, the O&M expenses for the nth year and also for the year immediately preceding the Control Period, i.e.

2018-19 shall be approved based on the formula given below:-

$$O\&Mn = R\&Mn + EMPn + A\&Gn$$

Where –.....

$$R\&Mn = K \times (GFA \text{ n-1}) \times (1+WPIinflation) \text{ and}$$

.....”

Stakeholders Comments/Suggestions

4.19.1 UJVN Ltd. submitted that by applying the said formula the R&M expenses will never increase if the capital cost (GFA) of the plant remains same for the entire control period. The above statement is on the basis of the fact that K factor is fixed for the control period and if WPI inflation rate remains same as for previous year.

Commission’s View

4.19.2 In this regard, UJVN Ltd. has taken assumption that WPI and K factor remains constant throughout the control period. The formula is dependent upon WPI and K factor only and if these parameters do not change and also there is no addition in GFA then allowable R&M expense shall remain constant, which is a simple mathematical equation. WPI being a variable, the change in the same both upwards and downwards will absorb the impact of inflation or otherwise and the allowable R&M expenses will also change accordingly. Moreover, if there is no addition in GFA then increased R&M expense for existing assets is not justified in a situation where WPI is constant. Therefore, the Commission is of the view that there is no ground for amending the Regulations on the points stated by UJVN Ltd. Hence, no change in this regard as proposed by UJVN Ltd. is carried out by the Commission. However, UJVN Ltd. is advised to properly schedule its maintenance activities so as to ensure that regular maintenance is being carried out every year and major repairs for its HEPs should be planned in such a manner that every year some plants are taken up for major/capital overhaul/repair keeping in view the overall R&M norm rather than not carrying out such major repairs for years together for most of the plants and then taking up such repairs in one year for all the plants. Moreover planned R&M activities on year on year basis based on grouping of HEPs would also entail ‘K’ factor to depict normative projections close to actuals.

4.20 Sub-regulation (2)(d) of Regulation 48, in respect of “O&M expenses of HEPs”.

First proviso to Regulation 48(2)(d) specifies as under:

(2) For Hydro Generating Stations

...

(d) Post determination of base O&M Expenses for the base year, i.e. FY 2017-18, the O&M expenses for the nth year and also for the year immediately preceding the Control Period, i.e. 2018-19 shall be approved based on the formula given below:-

$$O\&M_n = R\&M_n + EMP_n + A\&G_n$$

Where –.....

Provided that for the projects whose Renovation and Modernisation has been carried out, the R&M expenses for the nth year shall not exceed 2% of the capital cost admitted by the Commission ...

.....”

Stakeholders Comments/Suggestions

4.20.1 UJVN Ltd. submitted that after RMU the power plant is supposed to be in operation for next 30-35 year just like a new plant. In case of new plant the capital cost are very high whereas the capital invested in RMU is quite low as compared to new plants of similar capacity as most of the major works, e.g. Civil works/Hydro Mechanical Works/Buildings and Land for which capital is required to be invested for proper completion of the new power plant, are not carried out during RMU of the project. In RMU generally the main plant and associated equipment/machinery are replaced or overhauled along with auxiliaries. In view of lower capital cost after RMU compared to new plants, R&M expenses for the nth year limited to 2% of the capital cost is insufficient to maintain all civil/hydro mechanical/building structures and equipments along with R&M of main plant and machinery. UJVN Ltd. proposed that, considering the above facts, while allowing R&M expenses to a plant which has undergone RMU the cap limit for allowance of R&M expenses should be raised to 4% of the capital cost approved by the Commission.

Commission’s View

4.20.2 In this regard, the Commission agrees with the justification given by UJVN Ltd. that works related to civil, hydro mechanical, building etc. are not carried out during the RMU and generally only the main plant and associated equipment/machinery are

replaced or overhauled along with auxiliaries. Therefore, as compared to new plants there is not much drastic decline in the R&M expenses of the plants that have undergone RMU, and the cap of 2% of the capital cost on R&M expenses is insufficient to maintain all civil, hydro mechanical, building structures and related equipments along with R&M of main plant and machinery. The Commission, accordingly, modifies the percentage from 2% to 4% as provided in the first proviso to Regulation 48(2)(d) of the proposed draft Regulations.

4.21 Sub-regulation (4) & (5) of Regulation 50, in respect of “Computation and Payment of Capacity Charges and Energy Charges for Hydro Generating Stations”

Regulation 48(2)(d) specifies as under:

“

...

(4) *The Energy Charge shall be payable by every beneficiary for the total energy supplied to the beneficiary, during the calendar month, on ex-power plant basis, at the computed Energy Charge rate. Total Energy Charge payable to the Generating Company for a month shall be:*

(Energy Charge Rate in Rs. / kWh) x {Energy supplied (ex-bus)} for the month in kWh} x (100- FEHS)/100

(5) *Energy Charge Rate (ECR) in Rupees per kWh on ex-power plant basis, for a Hydro Generating Station, shall be determined up to three decimal places based on the following formula, subject to the provisions of sub-Regulation (7):*

$$ECR = AFC \times 0.5 \times 10 / \{DE \times (100 - AUX) \times (100 - FEHS)\}$$

Where,

DE = Annual Design Energy specified for the hydro generating station, in MWh.,

FEHS = Free Energy for home State, in percent, as applicable

...”

Stakeholders Comments/Suggestions

4.21.1 M/s GBHPPL proposed the tariff regulation needs to be considerate to such cases where meter reading is not at generating station bus-bar with no fault of the generator. In such cases, the tariff regulation should provide for requisite tolerance in the saleable energy computation to compute the Energy Charge Rate (ECR) as well as Energy Charge (EC) in line with the spirit of the MYT regulations.

Commission's View

4.21.2 In this regard Regulation 3(46) specifies the definition of interconnection point which means the point where the power from the generating station switchyard bus of the Seller is injected into the interstate/intrastate transmission system, as the case may be. Hence, as per the Regulations meter reading should be at the out-gantry of the generating station switchyard. However, the proposal of M/s GBHPPL is case specific and requires detailed study and analysis before arriving at a conclusion. The Regulations being guiding principle cannot be amended to cover peculiarity of each and every case that may require deliberation and adjustments. The Petitioner is at liberty to raise such issues categorically in the Tariff filing with proper justification and analysis before the Commission. Hence, changes in this regard as proposed by M/s GBHPPL is not accepted.

4.22 Regulation 55, in respect of "Purchase of Electricity by the Generating station/Start up Power".

Regulation 55 specifies as under:

(1) Any person, who establishes, maintains and operates a generating station and normally does not need power from the licensee round the year, i.e. who is not a consumer of the licensee, may purchase electricity from any generating company or a distribution licensee in case his plant is not in a position to generate electricity to meet the its own requirement or for start up and consequently power is required to be drawn from distribution licensee.

(2) In case of electricity generated from the plant is sold to the State Distribution Licensee, the electricity (in kWh) procured by the Generating Station from the State Distribution Licensee to meet its requirement of startup power, will be adjusted from the electricity sold to the Distribution Licensee. The Distribution Licensee shall make the payment for net energy sold to it by the Generating Company, i.e. difference of the total energy supplied by the Generating Company to the Distribution Licensee and energy supplied by the Distribution Licensee to the Generating Company.

(3) In case of electricity generated from the plant is sold to third party other than the State Distribution Licensee, then such purchase of electricity by the generating company from the State distribution licensee, shall be charged as per the tariff determined by the Commission for temporary supply under appropriate "Rate Schedule of tariff" for Industrial Consumers considering maximum demand during the month as the contracted demand for that month. The Fixed/Demand charges for that month shall be payable for the number of days during which such

supply is drawn. Such Generating Company shall, however, be exempted from payment of monthly minimum charges or monthly minimum consumption guarantee charges or any other charges."

Stakeholders Comments/Suggestions

4.22.1 M/s SEPL & M/s GIPL submitted that there is no provision for settlement of power imported by generator with long term PPA for sale of power to the State Distribution Licensee but not generating power due to constraint from DISCOMS and proposed that a clause may be incorporated in the Regulations as follows:

The import of power during the period of no generation by the generator over the current year shall be settled at the average variable cost of export for that year, while true up. Import by the generator should not be liable to be charged with RTS-10 as Temporary Supply consumer, being generator under long term PPA.

Commission's View

4.22.2 In this regard the Commission agrees with the proposal of the generators. Such an eventuality was not covered in the Regulations. The Regulations cover the cases where generator is generating electricity and selling the same to the licensee and in case it requires any power from the licensee the adjustment of import and export is done and balance unit is billed by the generator. However, in case there is no PPA with the discom and the generator is selling power to third party, any power used as start up power by the generator will be billed under RTS-10. The above eventuality that although generator has a PPA with UPCL but in any period if the import exceeds export, then the methodology for billing the same is not covered in the Regulations. However, UPCL being one of the stakeholders, the Commission will not decide on this issue without giving an opportunity to UPCL to submit its response in the matter. Accordingly, the generators are advised to separately represent this matter wherein the Commission will take a view after hearing all the stakeholders. Hence, the change proposed as above is not accepted by the Commission.

4.23 Sub-regulation (2) of Regulation 61, in respect of "Target Availability for recovery of full transmission charges"

In this regard, Regulation 61(2) of the draft MYT Regulations, 2018 specifies as under:

"61. Norms of Operation

...

(2) Target Availability for recovery of full transmission charges

(a) AC System : 98%

Note:

Recovery of fixed charges below the level of target availability shall be on pro-rata basis. At zero availability, no transmission charges shall be payable.

The target availability shall be calculated in accordance with procedure specified in Appendix- IV to these Regulations and shall be certified by Uttarakhand State Load Despatch Centre.

Provided that no incentive shall be payable for availability beyond 99.75%:

Provided also that for AC system, two trippings per year shall be allowed. After two trippings in a year, additional 12 hours outage shall be considered in addition to the actual outage:

Provided also that in case of outage of a transmission element affecting evacuation of power from a generating station, outage hour shall be multiplied by a factor of 2."

Stakeholders Comments/Suggestions

4.23.1 PTCUL submitted that in case of outage of a transmission element more relaxation in hours of outage is required as most of the terrain of the State of Uttarakhand is hilly and far away from the main road and the work of maintenance of Transmission Line and restoring the system from breakdowns in such difficult terrain is a tedious and time consuming job, due to cartage of material and T&P by head loading etc. Therefore, it is requested and proposed before the Commission that the allowable time for outage of the transmission elements may be relaxed and additional 24 hours outage should be considered in addition to the actual outage.

Commission's View

4.23.2 The Commission does not accept the proposal of PTCUL in this regard. These provisions are in force since 2004. The Central transmission utility, PGCIL, which has also assets in varied terrains including hilly areas is also governed by similar provisions. Hence, no change as proposed by PTCUL is accepted.

4.24 Clause (d) of Regulation 85, in respect of non-tariff income relating to the Distribution Business

Clause (d) of the Regulation 85 specifies as follows:

“85. Non-Tariff Income

The amount of non-tariff income relating to the Distribution Business and/or the Retail Supply Business as approved by the Commission shall be deducted from the Aggregate Revenue Requirement in calculating the revenue requirement from retail sale of electricity of the Distribution Licensee:

Provided that the Distribution Licensee shall submit full details of his forecast of non-tariff income to the Commission along with his application for determination of tariff.

The indicative list of various heads to be considered for Non-Tariff Income shall be as under:

...

(d) Rebates for timely payment of bills;

...”

Stakeholders Comments/Suggestions

4.24.1 UPCL submitted before the Commission that as per the provisions of the existing power purchase agreements, UPCL is entitled for a rebate from 1% to 2% in the cases where the bill is paid before the normal due/payment date. For making early payment of power purchase bills, to avail such rebate, UPCL is required to take short term loan/over draft from the bank as the cost of such loan is less than the value of rebate on power purchase bills. UPCL has stated that availing the power purchase rebate for making early payment of the power purchase bills and cost of borrowed funds for availing such rebate, both activities are working capital management of UPCL to reduce the overall working capital cost, the benefit of which is directly passed on to the consumers and therefore interest cost incurred for making early payment of power purchase bills needs to be reduced from the amount of rebate. Therefore, clause (d) of Regulation 85 should be amended as follows:

(d) Rebates for timely payment of bills as reduced by the interest cost incurred on this account.

Commission’s View

4.24.2 In this regard, the Commission would like to state that this issue has been already dealt and rejected in Tariff Order for FY 2018-19 and also in the Review Petition filed by UPCL on the said Tariff Order of the Commission. The interest on overdraft facility and revenue earned through rebate are two different elements and needs to be dealt

accordingly. Further, as per the norms specified in the Regulations, the Petitioner will not require any working capital if it will carry its operations efficiently and recover its dues from the consumers on time. Hence, no change proposed by UPCL in this regard is accepted by the Commission.

4.25 Regarding Design Energy for Hydro Plants.

Stakeholders Comments/Suggestions

4.25.1 UJVN Ltd. submitted that they are having 10 LHPs out of which 09 are old and most of these have already outlived their normative life. UJVNL is not in possession of DPR and other relevant documents for presenting its claim for revision of design energy from CEA. The Commission has determined the design energy on the basis of average generation of 15 years prior to FY 2004-05 or Design Energy Mutually agreed in PPA Dated 18.12.2000 whichever is lower. Moreover, the RMU of some of these plants have been approved by the Commission. The discharge data taken for calculation of Design Energy in DPRs for RMU are on the basis of available records which are comparatively of short period and in some cases dependent on other government bodies like UP Irrigation department. In view of all this, it is likely that the design energy envisaged in the DPR are not achieved after RMU. It is proposed that provision for revision of Design Energy, on the basis of relevant facts and documentary proofs as deemed proper by the Commission, may kindly be incorporated in the draft regulations, in case the generating company fails to achieve generation up to design energy for last 04 years continuously. Further, due consideration may kindly be made in draft regulations for Design Energy/Saleable Energy of Hydro Power Station towards the GoU Order 708/I/2018-05/24(Writ)/2018 dated 05.06.2018 regarding maintaining minimum 15% of the average lean season flow of that river.

Commission's View

4.25.2 In this regard, the Commission is of the view that claim of UJVN Ltd. that Design Energy as proposed in the RMU DPRs is based on discharge data of short period and practically cannot be achieved, is baseless and devoid of merit. It appears that at the time of filing the Petition for approval of RMU of the plants, UJVN Ltd. projects a brighter picture of design energy for the sake of getting approval and later on once the RMU is approved it proposes for revision in design energy before the Commission. It is

pertinent to mention that UJVN Ltd. should do proper study and analysis of design and discharge data at the time of proposing design energy in the RMU Petition. UJVN Ltd. started operation in the year 2001 and therefore, it would be having discharge data for atleast 18-20 years. It should analyse the data it has in its possession with the data provided by UP Irrigation department and unless major aberrations exists, it should not contest the data. There is no merit in amending the approved design energy already approved by the Commission in the disguise of amending the Regulations. Moreover giving liberty for revisiting the design energy based on certain factors would serve as a tool for the generator to burden its inefficiencies on the consumers. Further, with respect to GoU Order regarding maintaining minimum 15% of the average lean season flow of the river, the Commission advises UJVN Ltd. to bring this up before the Commission based on verified data during the Tariff filing. Hence, no change as proposed in this regard by UJVN Ltd. is considered in the proposed Regulations.

List of Stakeholders

Sr. No.	Name	Designation	Organisation	Address
1.	Sh. Sanjaya Mittal	Director (Projects)	Power Transmission Corporation of Uttarakhand Ltd.	Vidyut Bhawan, Near I.S.B.T. Crossing, Saharanpur Road, Majra, Dehradun-248002
2.	Sh. Purushottam Singh	Director (Operations)	UJVN Ltd.	“Ujjwal”, Maharani Bagh, GMS Road, Dehradun - 248006
3.	Sh. Meg Bahadur	General Manager (Commercial)	UJVN Ltd.	“Ujjwal”, Maharani Bagh, GMS Road, Dehradun - 248006
4.	Sh. G. Anjaneyulu Naidu	-	M/s Sravanthi Energy Pvt. Ltd.	LG Floor, 136, Rider House, Sector-44, Gurgaon-122002, NCR Delhi
5.	Sh. Arpit Agarwal	Sr. Manager	M/s Gama Infraprop (P) Ltd.	M - 3, First Floor, Hauz Khas, Aurbindo Marg, New Delhi-110016
6.	Sh. A.K. Agarwal	Director (Operations)	Uttarakhand Power Corporation Ltd.	Victoria Cross Vijeta Gabar Singh Bhawan, Kanwali Road, Dehradun
7.	Sh. Manoj Tanwar	-	M/s Greenko Budhil Hydro Power Pvt. Ltd.	Plot No. 1367, Road No. 45, Jubilee Hills, Hyderabad-500033

List of Participants

Sr. No.	Name	Designation	Organisation	Address
1.	Shri Kamal Kant	Chief Engineer (C&R)	Power Transmission Corporation of Uttarakhand Ltd.	Vidyut Bhawan, Near I.S.B.T. Crossing, Saharanpur Road, Majra, Dehradun-248002
2.	Shri Vikas Sharma	Superintending Engineer (C&R)	Power Transmission Corporation of Uttarakhand Ltd.	Vidyut Bhawan, Near I.S.B.T. Crossing, Saharanpur Road, Majra, Dehradun-248002
3.	Shri Manoj Kumar	Executive Engineer	Power Transmission Corporation of Uttarakhand Ltd.	Vidyut Bhawan, Near I.S.B.T. Crossing, Saharanpur Road, Majra, Dehradun-248002
4.	Ms. Saima Kamal	Executive Engineer (C&R)	Power Transmission Corporation of Uttarakhand Ltd.	Vidyut Bhawan, Near I.S.B.T. Crossing, Saharanpur Road, Majra, Dehradun-248002
5.	Ms. Neha Nirala	Assistant Engineer (C&R)	Power Transmission Corporation of Uttarakhand Ltd.	Vidyut Bhawan, Near I.S.B.T. Crossing, Saharanpur Road, Majra, Dehradun-248002
6.	Sh. Gaurav Sharma	Executive Engineer (RM)	Uttarakhand Power Corporation Ltd.	Victoria Cross Vijeta Gabar Singh Bhawan, Kanwali Road, Dehradun.
7.	Sh. S.K. Mehta	Accounts Officer (Commercial)	Uttarakhand Power Corporation Ltd.	Victoria Cross Vijeta Gabar Singh Bhawan, Kanwali Road, Dehradun.
8.	Sh. Meg Bahadur	General Manager (Commercial)	UJVN Ltd.	"Ujjwal", Maharani Bagh, GMS Road, Dehradun - 248006
9.	Sh. Ambrish Sharma	Executive Engineer (Commercial)	UJVN Ltd.	"Ujjwal", Maharani Bagh, GMS Road, Dehradun - 248006
10.	Shri D.C. Sharma	Executive Engineer (Commercial)	UJVN Ltd.	"Ujjwal", Maharani Bagh, GMS Road, Dehradun - 248006
11.	Sh. Arpit Agarwal	Sr. Manager	M/s Gama Infraprop (P) Ltd.	M - 3, First Floor, Hauz Khas, Aurbindo Marg, New Delhi-110016
12.	Sh. Rakesh Pandey	Manager	M/s Sravanthi Energy Pvt. Ltd.	LG Floor, 136, Rider House, Sector-44, Gurgaon-122002, NCR Delhi
13.	Sh. Anuj Singh	Dy. Manager	M/s Sravanthi Energy Pvt. Ltd.	LG Floor, 136, Rider House, Sector-44, Gurgaon-122002, NCR Delhi