

यूजेवीएन लिमिटेड

(उत्तराखण्ड सरकार का उपक्रम)

UJVN LIMITED

(A Govt. of Uttarakhand Enterprise)

कार्यालय निदेशक (परिचालन), "उज्ज्वल", महारानी बाग, जी०एम०एस० रोड, देहरादून - 248 006 (उत्तराखण्ड), दूरभाष: 0135-2761484, फैक्स: 0135-2763506
Office of the Director (Operations), "UJJWAL", Maharani Bagh, G.M.S. Road, Dehradun - 248 006 (Uttarakhand), Phone: 0135-2761484, Fax: 0135-2763506
CIN No. 40101UR2001SGC025866 ISO 9001:2008 Certified

No. 474/UJVNL/02/D(O)/C-20

Dated: 09 April, 2021

The Secretary,
Uttarakhand Electricity Regulatory Commission
"Vidyut Niyamak Bhawan"
Near ISBT, Dehradun

Subject: Stakeholder's comments on UJVN Ltd.'s Petitions for True up of Tariff for FY 2019-20, Annual Performance Review for FY 2020-21 & Determination of Tariff for FY 2021-22 for 10 LHPs of UJVN Ltd.

Sir,

Kind reference is invited to your letter no. UERC/5/Tech/726/Pet. No. 02 to 11 of 2021/10 dated 01.04.2021 vide which comments of the stakeholders have been sent.


Replies on the comments of stakeholders are being enclosed herewith as follows:

S. No.	Details of Stakeholders	Annexure
1.	Sh. S. R. Gupta, Human Right Protection Society, E-24, Sharda Nagar, Near Shani Mandir, Jwalapur, Haridwar.	Annexure-1
2.	Sh. Pawan Agrawal, Uttarakhand Steel Manufacturers Association, C/o Shree Sidhbali Industries Ltd. Kandi Road, Kotdwar.	Annexure-2
3.	Sri Pankaj Gupta, President, Industries Association of Uttarakhand, Mohabewala Industrial Area, Dehradun.	Annexure-3

As directed the replies are also being directly sent to the stakeholders through registered post.

Thanking you,

Yours Sincerely,


(Purushottam Singh)
Director (Operations)
Encl. as above

NIO

CC:

1. Managing Director, UJVN Ltd. "Ujjwal", G.M.S. Road, Dehradun.
2. General Manager (Commercial), UJVN Ltd. "Ujjwal", G.M.S. Road, Dehradun.

ANNEXURE-1

Response on the comments of Human Right Protection Society

श्री एस0 आर0 गुप्ता, मानव अधिकार संरक्षण समिति, ज्वालापुर, हरिद्वार।

Reference:

1. The Hon'ble UERC's Letter No -UERC/5/Tech/726/Pet. No. 02 to 2021/10 dated 01.04.2021
2. Letter No. MASS/20-21/17 dated 01.03.2021

यूजेवीएन लिमिटेड के टैरिफ पेटिशन मा0 उत्तराखण्ड विद्युत नियामक आयोग द्वारा निर्गत रेगुलेशन एवं पिछले वर्षों के वास्तविक व्यय अनुरूप तैयार की गयी हैं।

यूजेवीएन लि0 एक जिम्मेदार वाणिज्यिक संस्थान है, और न्यूनतम खर्चों में अधिकतम व गुणवत्तापूर्ण विद्युत उत्पादन हेतु प्रयासरत् रहता है। यूजेवीएन लि0 द्वारा संचालित विद्युत गृहों में अधिकतर अपनी सेवाकाल पूरा कर चुके हैं, और कम क्षमता व दक्षता के साथ संचालित हो रहे हैं। साथ ही इन विद्युत गृहों को अतिरिक्त पूंजीगत खर्च के द्वारा पूर्ण क्षमता व दक्षता के साथ संचालित करने के लिये प्रयास किये जा रहे हैं, जिससे कि विद्युत गृहों से अधिकतम व गुणवत्तापूर्ण विद्युत उत्पादन प्राप्त किया जा सके।

यह भी अवगतनीय है कि विगत समय में कोविड-19 की चुनौतियों के समक्ष जहाँ एक ओर लगभग सभी कल-कारखाने पूरी तरह से बन्द पड़े थे, यूजेवीएन लि0 के सभी विद्युतगृह अपनी पूर्ण क्षमतानुरूप उत्पादनरत् रहे हैं, वर्तमान में भी उत्पादनरत् हैं।

यूजेवीएन लि0 विगत कई वर्षों से न केवल लाभ अर्जित कर रहा है, वरन सरकार को लाभांश देने वाला अग्रणी संस्थान है।


(Punishram Singh)
Director (Operation)
UJVN Ltd.
Dehradun

ANNEXURE-2

Response on the comments of Uttarakhand Steel Manufacturers Association

Kind Att. - Mr. Pawan Agarwal, Vice President

Reference:

1. The Hon'ble UERC's Letter No -UERC/5/Tech/726/Pet. No. 02 to 2021/10 dated 01.04.2021
2. Letter No. NIL dated 22.03.2021

बिन्दु संख्या (अ): -

उत्तराखण्ड सरकार के शासनादेश दिनांक 31.05.2017 (प्रतिलिपि संलग्न) के अनुपालन में यूजेवीएन लि० द्वारा यूपीसीएल को प्रति यूनिट विक्रय की गयी विद्युत पर सैस (Cess) तीस (30) पैसा प्रति यूनिट व रोयल्टी (Royalty) दस (10) पैसा प्रति यूनिट देय है। यूजेवीएन लि० की वर्तमान जल विद्युत परियोजनाओं की बिक्री योग्य विद्युत उत्पादित विद्युत पर जो दस वर्ष से अधिक समय से वाणिज्यिक संचालन में हों तथा जिनकी उत्पादित बिक्री योग्य विद्युत का विक्रय मूल्य दो सौ (200) पैसा प्रति यूनिट से अधिक न हो, उन पर सैस व रोयल्टी की देयता बनती है।

यह ज्ञातव्य है कि सैस व रोयल्टी के सम्बन्ध में कोई भी निर्णय उत्तराखण्ड शासन के स्तर पर ही लिया जा सकता है। इस सम्बन्ध में कोई भी निर्णय लेने का अधिकार उत्तराखण्ड सरकार के पास है।


(Purushottam Singh,
Director (Operation))

ANNEXURE-3

Response on the comments of Industries Association of Uttarakhand

Kind Att. - Mr. Pankaj Gupta, President

Reference:


1. The Hon'ble UERC's Letter No - UERC/5/Tech/726/Pet. No. 02 to 11 of 2021/10 dated 01.04.2021
2. Letter No. NIL dated 30.03.2021

1. Preface: - No comments.

2. Initial Reaction: - UJVN Ltd is a generating company that has always strived for utilizing the resources in utmost efficient manner. It has been continuously making efforts to ensure strict commercial discipline and strive to protect the public interest. UJVN Ltd is the only company of Government of Uttarakhand earning significant profit and is able to pay dividend to the GoU during the past several years.

UJVN Ltd has incurred and claimed Repair and Maintenance cost of Rs. 87.52 Crore only for 10 LHPs against Rs. 110.64 Crore approved by the Hon'ble UERC for the true-up year of FY 2019-20. So, it has saved Rs. 23.12 Crore in Repair and Maintenance cost in FY 2019-20 while achieving overall generation of 5088.88 MU against the target of 4822.00 MU. Therefore, it is not justified to say that UJVN Ltd has not shown commercial discipline and is not acting in public interest.

Further, the petitions for determination of tariff are prepared in accordance to the Regulations notified by Hon'ble Commission. The tariff of upcoming years is proposed on normative basis and truing up for the past year is claimed based on the actual audited expenditure and as per the provisions specified in the Regulations. All efforts are made to comply with the directives of Hon'ble Commission.


(Parashram Singh)
Director (Operation)
UJVN Ltd.
Dehradun

3. Comments on present tariff petition: -

(i) **Capital Cost of Maneri Bhali-II**

It may kindly be noted that tariff petition of MB-II HEP has been prepared on the basis of capital expenditure actually incurred.

(ii) **Treatment of PDF utilized in construction of Maneri Bhali-II**


As regard equity contributed by GoU out of withdrawal from Power Development Fund, UJVN Ltd. has considered Return on Equity on full equity including the amount invested out of PDF.

UJVN Ltd, in view of the appeals filed with the Hon'ble APTEL in the matter of Capital cost and RoE on PDF for MB-II, has considered actual capital cost incurred in Maneri Bhali-II and Return on Equity on full equity including the amount investment out of PDF while computing the Tariff for MB-II HEP.

(iii) **Other Cost:** - UJVN Ltd. prepared its tariff petition on actual/normative basis in accordance to the Regulations notified by the Hon'ble Commission.


(iv) **Rate of interest:** - UJVN Ltd has got a reduction in the interest paid to PFC for MB-II HEP over the period. The impact so received has been passed on to the consumers of the state by the Hon'ble UERC in the previous tariff orders. Further, UJVN Ltd has adopted an approach of getting loan on an open tender basis to get the competitive interest rates for financing of its ongoing/upcoming projects.

(v) **Additional Capitalisation:** - UJVN Ltd is a responsible generating company which has always strived for the better utilization of its resources and attaining utmost efficiency from them is its


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continuous endeavor. UJVN Ltd has never intended to increase its spending just to earn better Return on Equity. UJVN Ltd is running the Hydro Power Stations which mostly have completed their life span and Renovation of the power plants and dams/barrages has become the necessity in the current times. Therefore, Additional Capitalization proposed in the FY 2020-21 and FY 2021-22 includes the proposal against Renovation, Modernization and Up gradation (RMU) of Dhalipur, Chilla and Maneri Bhali –I HEPs and Renovation of Dams/Barrages through DRIP-II and III schemes.

- (vi) **Normative Annual Plant Availability Factor:** - UJVN Ltd has proposed to achieve almost equal or higher Normative Annual Plant Availability Factor (NAPAF) for Dhakrani, Chibro, Khodri, Kulhal and Khatima HEPs during the FY 2020-21 and FY 2021-22. The projections of NAPAF are on lesser sides for Dhalipur, Chilla and MB-I due to the proposed RMU works. In case of Ramganga HEP, UJVN Ltd is not able to achieve the approved NAPAF because of the fact that operation of the Ramganga Dam is in the hands of irrigation department of Uttar Pradesh and they release the water based upon their own irrigation requirement. While in case of MB-II HEP UJVN Ltd is not able to achieve the approved NAPAF due to the severe damage of underwater parts owing to availability of excessive silt particles in the river water.
- (vii) **Design Energy/Actual Energy Generated:** - UJVN Ltd has sought revision in Design Energy for its 10 large hydropower plants' due to reduced discharge available for generation of power in view of the NGT order and GoU Order no. 708/I/2018-05/24(Writ)/2016 dated 05.06.2018, in compliance of which minimum 15% of average lean season flow of rivers has to be maintained in the state. Further, the Gazette notification has also been issued by Govt. of India on 09.10.2018 in this regard. Further, UJVN Ltd is also complying the directives of National Mission for Clean Ganga (NMCG) issued vide


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order dated 10.10.2018 and 14.09.2019 for releasing the lean period discharge of 20%, 25% and 30% which is applicable on MB-I, MB-II and Chilla HEPs of UJVN Ltd. Regular monitoring of the discharge released from the said dams/barrages is being done by the concerned agency.

In view of aforesaid orders of NGT and GoU/Gol, UJVNL has maintained the minimum discharges and therefore the available water discharge has reduced in the tunnels/power channels of the power stations of UJVN Ltd. Consequent upon the reduction in the discharge available for power generation, the quantum of power generation as well as the declared capacity of the power plants has reduced accordingly. Therefore, UJVN Ltd has requested the Hon'ble UERC for revision of Design Energy of the affected hydro power stations.

(viii) **Conclusion & Prayer:** - No comments.


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