

Order

on

Approval of Business Plan and

Multi Year Tariff Petition

For

State Load Despatch Centre of

Uttarakhand

For

Fourth Control Period

(FY 2022-23 to FY 2024-25)

March 31, 2022

Uttarakhand Electricity Regulatory Commission

Vidyut Niyamak Bhawan, Near I.S.B.T., P.O. Majra

Dehradun - 248171

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Before

UTTARAKHAND ELECTRICITY REGULATORY COMMISSION

Petition No. 51 of 2021

And

Petition No.: 52 of 2021

In the Matter of:

Petition filed by State Load Despatch Centre of Uttarakhand for approval of Business Plan for fourth Control Period from FY 2022-23 to FY 2024-25.

AND

In the Matter of:

Petition filed by State Load Despatch Centre of Uttarakhand for determination of Multi Year Tariff for fourth Control Period from FY 2022-23 to FY 2024-25.

AND

In the Matter of:

State Load Despatch Centre (SLDC)
132 kV Sub-station, H/Q Building, Majra,
Dehradun, Uttarakhand

.....Petitioner

Coram

Shri D. P. Gairola	Member (Law) / Chairman (I/c)
Shri M. K. Jain	Member (Technical)

Date of Order: March 31, 2022

Section 32(3) of the Electricity Act, 2003 (hereinafter referred to as “the Act”) allows the State Load Despatch Centre to levy and collect such fee and charges from generating companies and licensees involved in intra-State transmission as may be specified by the Appropriate Commission. To this end, it is required to file an application for determination of these charges in such manner and along with such fee as may be specified by the Appropriate Commission through Regulations.

In accordance with the relevant provisions of the Act, the Commission had notified Uttarakhand Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff) Regulations, 2011 (hereinafter referred to as “UERC Tariff Regulations, 2011”) for the first Control Period from FY 2013-14 to FY 2015-16 specifying therein terms, conditions and norms of operation for licensees, generating companies and SLDC. The Commission had issued the Order dated April 10, 2014 on Aggregate Revenue Requirement for SLDC for FY 2013-14 to FY 2015-16. In accordance with the provisions of UERC Tariff Regulations, 2011, the Commission had issued the Order dated April 11, 2015 on Aggregate Revenue Requirement for SLDC for FY 2015-16.

Further, in accordance with the relevant provisions of the Act, the Commission had notified Uttarakhand Electricity Regulatory Commission (Terms and Conditions for Determination of Multi Year Tariff) Regulations, 2015 (hereinafter referred to as “UERC Tariff Regulations, 2015”) for the second Control Period from FY 2016-17 to FY 2018-19 specifying therein terms, conditions and norms of operation for licensees, generating companies and SLDC. The Commission had issued the Order dated April 5, 2016 on Aggregate Revenue Requirement for SLDC for FY 2016-17 to FY 2018-19. In accordance with the provisions of UERC Tariff Regulations, 2015, the Commission had carried out the Annual Performance Review for FY 2016-17, FY 2017-18 and FY 2018-19 vide its Orders dated March 29, 2017, March 21, 2018 and February 27, 2019 respectively.

Further, in accordance with the relevant provisions of the Act, the Commission had notified Uttarakhand Electricity Regulatory Commission (Terms and Conditions for Determination of Multi Year Tariff) Regulations, 2018 (hereinafter referred to as “UERC Tariff Regulations, 2018”) for the third Control Period from FY 2019-20 to FY 2021-22 specifying therein terms, conditions and norms of operation for licensees, generating companies and SLDC. The Commission had issued the Order dated February 27, 2019 on Aggregate Revenue Requirement for SLDC for FY 2019-20 to FY 2021-22. In accordance with the provisions of UERC Tariff Regulations, 2018, the Commission had carried out the Annual Performance Review for FY 2019-20 vide its Order dated April 18, 2020 and Annual Performance Review for FY 2020-21 vide its Order dated April 26, 2021.

Further, in accordance with the relevant provisions of the Act, the Commission had notified Uttarakhand Electricity Regulatory Commission (Terms and Conditions for Determination of Multi Year Tariff) Regulations, 2021 (hereinafter referred to as “UERC Tariff Regulations, 2021”) for the fourth Control Period from FY 2022-23 to FY 2024-25 specifying therein terms, conditions and norms of operation for licensees, generating companies and SLDC. In compliance with the

provisions of the Act and Regulation 8(1) and Regulation 10(1) of UERC Tariff Regulations, 2021, State Load Despatch Centre of Uttarakhand (hereinafter referred to as “SLDC” or “Petitioner”) filed separate Petitions for approval of its Business Plan for the fourth Control Period from FY 2022-23 to FY 2024-25 (Petition No. 51 of 2021 hereinafter referred to as the “Business Plan Petition”) and Multi Year Tariff Petition (Petition No. 52 of 2021 hereinafter referred to as the “MYT Petition”) on December 15, 2021. SLDC, in its Business Plan Petition, has submitted the Capital Investment Plan, Financing Plan, and Human Resources Plan for the fourth Control Period. Further, through the MYT Petition, SLDC has submitted the detailed calculations of its projected SLDC Charges for the fourth Control Period from FY 2022-23 to FY 2024-25 in accordance with the provisions of UERC Tariff Regulations, 2021.

Based on the submissions made by SLDC, the Commission vide its Order dated December 21, 2021 provisionally admitted the Petition for further processing with the condition that SLDC shall furnish any further information/ clarifications as deemed necessary by the Commission during the processing of the Petition within the time frame, as may be stipulated by the Commission, failing which the Commission may proceed to dispose of the matter as it deems fit based on the information available with it.

The Business Plan Petition filed by SLDC had certain infirmities/deficiencies which were informed to SLDC vide Commission’s letter no. UERC/7/CL/509/2021-22/2021/975 dated December 28, 2021 and SLDC was directed to rectify the said infirmities in the Petition and submit certain additional information. SLDC vide its letter no. 86/MD/PTCUL/UERC dated January 10, 2022 removed the critical deficiencies.

Further, the MYT Petition filed by SLDC also had certain infirmities/deficiencies which were informed to SLDC vide Commission’s letter no. UERC/7/CL/511/2021-22/2021/976 dated December 28, 2021 and SLDC was directed to rectify the said infirmities in the Petition and submit certain additional information necessary for admission of the Petition. SLDC vide its letter no. 85/MD/PTCUL/UERC dated January 10, 2022 removed the critical deficiencies.

This Order, accordingly, relates to the Business Plan Petition and the MYT Petition filed by the SLDC for approval of Business Plan and determination of SLDC Charges for the fourth Control Period from FY 2022-23 to FY 2024-25 and Annual Performance Review for FY 2021-22, and is based on the original as well as all the subsequent submissions made by SLDC during the course of the

proceedings.

Tariff determination being the most vital function of the Commission, it has been the practice of the Commission to elaborate in detail the procedure and to explain the underlying principles in determination of tariffs. Accordingly, in the present Order also, in line with past practices, the Commission has tried to elaborate the procedure and principles followed by it in determining the ARR of SLDC. The SLDC Charges are recoverable from the beneficiaries. It has been the endeavour of the Commission in past also, to issue Tariff Orders for SLDC concurrently with the issue of Order on retail tariffs for Uttarakhand Power Corporation Limited (UPCL), so that UPCL is able to honour the payment liability towards SLDC charges. For the sake of convenience and clarity, this Order has further been divided into following Chapters:

- Chapter 1 - Background and Procedural History.
- Chapter 2 - Petitioner's Submissions, Commission's Analysis, Scrutiny & Conclusion on Business Plan for the fourth Control Period.
- Chapter 3 - Petitioner's Submission, Commission's Analysis, Scrutiny and Conclusion on APR for FY 2021-22 and MYT for the fourth Control Period.
- Chapter 4 - Commission's Directives.
- Chapter 5 - Annexures.

1 Background and Procedural History

In accordance with the provisions of the Uttar Pradesh Reorganization Act 2000 (Act 29 of 2000), enacted by the Parliament of India on August 25, 2000, the State of Uttaranchal came into existence on November 9, 2000. Section 63(4) of the above Reorganization Act allowed the Government of Uttaranchal (hereinafter referred to as “GoU” or “State Government”) to constitute a State Power Corporation at any time after the creation of the State. GoU, accordingly, established the Uttaranchal Power Corporation Limited (UPCL) under the Companies Act, 1956, on February 12, 2001 and entrusted it with the business of transmission and distribution in the State. Subsequently, from April 1, 2001, all works pertaining to the transmission, distribution and retail supply of electricity in the area of Uttaranchal were transferred from Uttar Pradesh Power Corporation Limited (UPPCL) to UPCL, in accordance with the Memorandum of Understanding dated March 13, 2001, signed between the Governments of Uttaranchal and Uttar Pradesh.

Meanwhile, the Electricity Act, 2003 was enacted by the Parliament of India on June 10, 2003, which mandated separate licenses for transmission and distribution activities. In exercise of powers conferred under sub-section 4 of Section 131 of the Act, the GoU, therefore, through transfer scheme dated May 31, 2004, first vested all the interests, rights and liabilities related to Power Transmission and Load Despatch of “Uttaranchal Power Corporation Limited” into itself and, thereafter, re-vested them into a new company, i.e. “Power Transmission Corporation of Uttaranchal Limited”, now renamed as “Power Transmission Corporation of Uttarakhand Limited” after change of name of the State. The State Government, further vide another notification dated May 31, 2004 declared Power Transmission Corporation of Uttarakhand as the State Transmission Utility (STU) responsible for undertaking, amongst others, the following main functions:

- a) To undertake transmission of electricity through intra-State transmission system.
- b) To discharge all functions of planning and co-ordination relating to intra-State transmission system.
- c) To ensure development of an efficient, co-ordinated and economical system of intra-State transmission lines.
- d) To provide open access.

A new company in the State was, thus, created to look after the functions of intra-State Transmission and Load Despatch, on May 31, 2004. In view of re-structuring of functions of UPCL and creation of a separate company for looking after the transmission related works, the Commission amended the earlier 'Transmission and Bulk Supply License' granted to 'Uttarakhand Power Corporation Limited' and transmission license was given to PTCUL for carrying out transmission related works in the State vide Commission's Order dated June 9, 2004.

The State Load Despatch Centre of Uttarakhand has been made operational w.e.f. November 27, 2012. As per Section 32 of the Act, the State Load Despatch Centre is the apex body to ensure integrated operation of the power system in the State. The functions of State Load Despatch Centre as stipulated in the Act are as follows:

- a) be responsible for optimum scheduling and despatch of electricity within the State, in accordance with the contracts entered into within the Licensees or the Generating Companies operating in the State;
- b) monitor grid operations;
- c) keep accounts of the quantity of electricity transmitted through the State grid;
- d) exercise supervision and control over the intra-State transmission system; and
- e) be responsible for carrying out real time operations for grid control and despatch of electricity within the State through secure and economic operation of the State grid in accordance with the Grid Standards and the State Grid Code.

In exercise of powers conferred to it under Section 61 of the Act, and all other powers enabling it in this behalf, the Commission notified UERC Tariff Regulations, 2015 on September 10, 2015. These Regulations superseded UERC Tariff Regulations, 2011.

The Commission vide its Order dated April 5, 2016, approved the Business Plan and Multi Year Tariff for SLDC for the second Control Period from FY 2016-17 to FY 2018-19. Further, the Commission had carried out the Annual Performance Review for FY 2016-17 FY 2017-18 and FY 2018-19 vide its Orders dated March 29, 2017, March 21, 2018, and February 27, 2019, respectively.

In exercise of powers conferred to it under Section 61 of the Act, and all other powers enabling it in this behalf, the Commission notified UERC Tariff Regulations, 2018 on October 06, 2018. These Regulations superseded UERC Tariff Regulations, 2015.

The Commission vide its Order dated February 27, 2019, approved the Business Plan and Multi Year Tariff for SLDC for the third Control Period from FY 2019-20 to FY 2021-22. In accordance with the provisions of UERC Tariff Regulations, 2018, the Commission had carried out the Annual Performance Review for FY 2019-20 vide its Tariff Order dated April 18, 2020, and Annual Performance Review for FY 2020-21 vide its Tariff Order dated April 26, 2021.

As mentioned earlier also, in accordance with the provisions of the Act and Regulation 8(1) and Regulation 10(1) of UERC Tariff Regulations, 2021, SLDC is required to submit Business Plan Petition and MYT Petition for determination of Aggregate Revenue Requirement for the ensuing years latest by November 30, 2021. SLDC in compliance to the Regulations submitted the Business Plan Petition and MYT Petition for determination of ARR/SLDC Charges for the fourth Control Period from FY 2022-23 to FY 2024-25 on December 15, 2021.

The Business Plan Petition and MYT Petition was provisionally admitted by the Commission vide two separate Orders dated December 21, 2021. The Commission, through its above Admittance Orders dated December 21, 2021, to provide transparency to the process of tariff determination and give all stakeholders an opportunity to submit their objections/suggestions/comments on the proposals of SLDC, also directed SLDC to publish the salient features of its Petitions in the leading newspapers. The salient points of the proposals were published by the Petitioner in the following newspapers:

Table 1.1: Publication of Notice

Sl. No.	Newspaper Name	Date of Publication
1	The Times of India	December 24, 2021
2	Hindustan Times	December 24, 2021
3	Dainik Jagran	December 23, 2021
4	Amar Ujala	December 23, 2021

Through above notice, the stakeholders were requested to submit their objections/suggestions /comments latest by January 31, 2022 (copy of the notice is enclosed as **Annexure 1 and 2**). The Commission has not received any objections/suggestions/comments in writing on the Petitions filed by SLDC.

Further, for direct interaction with all the stakeholders and public at large, the Commission also held public hearings on the proposals filed by the Petitioner at the following places in the State of Uttarakhand.

Table 1.2: Schedule of Hearing

S. No.	Place	Date
1	Ranikhet	February 26, 2022
2	Rudrapur	February 27, 2022
3	Dehradun	March 2, 2022
4	Kotdwar	March 8, 2022

The list of participants who attended the Public Hearing is enclosed at **Annexure-3**.

The Commission also sent the copies of salient features of tariff proposals to Members of the State Advisory Committee and the State Government. The salient features of the Business Plan Petition and MYT Petition submitted by SLDC were also made available on the website of the Commission, i.e. www.uerc.gov.in. The Commission also held a meeting with the Members of the Advisory Committee on March 09, 2022, wherein, detailed deliberations were held with the Members of the Advisory Committee on the various issues linked with the Petitions filed by SLDC.

Meanwhile, based on the scrutiny of the Petitions filed by SLDC, the Commission vide its letter no. UERC/7/CL/509/2021-22/2021/975 dated December 28, 2021 and letter no. UERC/7/CL/511/2021-22/2021/976 dated December 28, 2021 and letter no. UERC/7/CL/511/Petition No. 52 of 2021/2021-22/1250 dated February 22, 2022 pointed out certain data gaps in the Petitions and sought following additional information/ clarifications from the Petitioner:

Business Plan Petition

- Capital expenditure plan in accordance with UERC Tariff Regulations, 2021.
- Preparedness to execute the capital works proposed and plan for monitoring the progress of execution of capex schemes during the fourth Control Period in terms of the orders placed and funds tie-up.
- Current status of recruitment process, its preparedness with regard to the approval from GoU and likely date of joining of the employees.
- Confirm if the proposed recruitment in FY 2022-23 to FY 2024-25 for SLDC is included in the proposed recruitment of PTCUL for the respective years as submitted in its Business Plan Petition.

MYT Plan Petition

- Details of scheme(s) against which the capitalisation is claimed.
- Actual employee expenses, A&G expenses and R&M expenses for the period April to December 2021.
- Monthly trial balances for the period April to December 2021.

So as to have a better clarity on the data filed by the Petitioner and to remove inconsistency in the data, a Technical Validation Session (TVS) was also held online on January 20, 2022, for further deliberations on certain issues related to the Petitions filed by SLDC. Minutes of above TVS were sent to the Petitioner vide Commission's letter no. UERC/7/CL/511/Petition No. 52 of 2021/2021-22/1116 dated January 21, 2022, for its response.

The Petitioner submitted the replies to data gaps vide its letter no. 86/MD/PTCUL/UERC, letter no. 85/MD/PTCUL/UERC, letter no. 552/MD/PTCUL/UERC and letter no. 638/MD/PTCUL/UERC dated January 10, 2022, January 10, 2022, February 24, 2022, and March 7, 2022 respectively. The Petitioner submitted the replies to issues raised in TVS vide its letter no. 315/MD/PTCUL/UERC dated January 31, 2022.

The submissions made by SLDC in the Petition as well as additional submissions have been discussed by the Commission at appropriate places in the Tariff Order along with the Commission's views on the same.

2 Petitioner's Submissions, Commission's Analysis, Scrutiny & Conclusion on Business Plan for the Fourth Control Period

2.1 Statutory Requirement

In light of the provisions of the Act, the Commission had notified the UERC Tariff Regulations, 2021 on September 14, 2021, applicable for determination of Tariff for the fourth Control Period from FY 2022-23 to FY 2024-25.

2.2 Multi Year Tariff Framework

As regards the Multi Year Tariff Framework, UERC Tariff Regulations, 2021 specifies as follows:

"4. Multi-year Framework

The Multiyear tariff framework shall be based on the following: -

- a) Business plan submitted by the applicant for the entire Control Period for the approval of the Commission prior to the beginning of the Control Period;*
- b) Applicant's forecast of expected ARR for each year of the Control Period, based on reasonable assumptions and financial & operational principles/parameters laid down under these Regulations submitted alongwith the MYT petition for determination of Aggregate Revenue Requirement and Tariffs for first year of the Control Period;*
- c) Review of control period ending on 31.03.2022 shall also be taken up alongwith the ARR/Tariff petition for the first year of ensuing Control Period;*
- d) Trajectory for specific parameters as may be stipulated by the Commission based on submissions made by the Licensee, actual performance data of the Applicants and performance achieved by similarly placed utilities;*
- e) Annual review of performance shall be conducted vis-à-vis the approved forecast and categorization of variations in performance into controllable factors and uncontrollable factors;*
- f) Sharing of excess profit or loss due to controllable and uncontrollable factors as per provisions of these Regulations.*

...

7. Determination of Baseline

The baseline values (operating and cost parameters) for the base year of the Control Period shall be determined by the Commission and shall be based on the approved values by the Commission, the latest audited accounts, estimates for the relevant year, prudence check and other factors considered by the Commission.

The Commission may re-determine the baseline values for the base year based on the actual audited accounts of the base year."

2.3 Business Plan for the fourth Control Period

Regarding Business Plan, Regulation 8 of the UERC Tariff Regulations, 2021 specifies as follows:

"8. Business Plan

(1) An Applicant shall submit, under affidavit and as per the UERC Conduct of Business Regulations as amended from time to time, a Business Plan by November 30th, 2021, for the Control Period of three (3) financial years from April 1, 2022 to March 31, 2025;

...

d) The Business Plan for the State Load Despatch Centre shall be for the entire control period and shall, interalia, contain-

(i) Capital Investment Plan including phasing of expenditure and funding pattern;

(ii) Estimated budget for the control period;

(2) The Applicant shall also submit the details in respect of its manpower planning for the Control period as part of Business Plan.

(3) The Commission shall scrutinize and approve the business plan after following the due consultation process."

In accordance with Regulation 8 of the UERC Tariff Regulations, 2021, the Petitioner submitted the Business Plan for the fourth Control Period from FY 2022-23 to FY 2024-25. The Petitioner in its Business Plan Petition and subsequent submissions has submitted the Capital Expenditure Plan, Capitalisation Plan, Financing Plan and Human Resources Plan for the fourth Control Period from FY 2022-23 to FY 2024-25. The Petitioner's submissions and the Commission's

analysis on approval of Business Plan for SLDC for the fourth Control Period from FY 2022-23 to FY 2024-25 are detailed below.

2.4 Capital Expenditure Plan and Capitalisation Plan

2.4.1 Petitioner's Submissions

SLDC endeavors to function as an independent organization in the future and efficiently carry out the processes of data acquisition and effecting energy accounting for the State in coordination with PTCUL.

Integrated operations of the power system of the State as vested upon the SLDC by the Electricity Act, 2003 as well as the State Grid Code, 2016 are not possible in the absence of RTUs at all generating stations and sub-stations. Further, communication equipment which can transmit time synchronized information to SLDC is required. The SLDC proposes to undertake projects aimed at building an Optical Power Ground Wire (OPGW) network for enabling higher quality communication over longer distances and installing RTUs at generating stations and sub-stations.

Optimal Scheduling and Dispatch, as required by section 32(2)(a) of the Act is possible only when the Declared Capacity (DC) of all generation plants and demand at various interface points between PTCUL and UPCL for all 15-minute blocks in a day is available with the SLDC.

SLDC is also required to maintain energy accounts of electricity transmitted through the State grid. This requires energy and transmission flow accounting procedures to be in place besides the infrastructure requirement. Secure and reliable operation is a critical requirement. SLDC is bound by Section 33 of the Act to give directions to various grid connected entities and also penalize them in case of violation. This requires infrastructure and procedures for the same to be in place.

In order to reduce the burden of Unscheduled Interchange from the Inter- State grid, it is imperative that proper procedures of energy accounting be developed. This will enable: (1) Accounting of energy injected into the State grid by each power plant, its deviation from the schedule and, hence, contribution of each generator towards Unscheduled Interchange from the grid, (2) Accounting of energy withdrawal from the grid by the distribution licensee, deviation from the schedule at each location in the State grid, contribution of each large consumer and the distribution company individually in causing Unscheduled Interchange from the Inter-State Transmission System and, (3) Computation of losses at all voltage levels and feeder-wise.

Transmission accounting is necessitated because: (1) Regional Transmission Deviation Accounts prepared by the Regional Power Committees (RPCs) penalize the beneficiary States for using the Inter-State Transmission Systems beyond the schedule and these penalties need to be charged from the actual users which cause such deviation, and (2) Transmission scheduling needs to be done at the level of the State also to have a signal for the need for capacity augmentation. The above procedures are important from the point of view of not only reducing the costs of operation of the power system but also aligning the developments in the State power system with those in the wholesale power market, which is regulated by CERC.

The Petitioner submitted that the implementation of Intra-State Energy Accounting in the State which includes installation of ABT compatible SEM meters at PTCUL Sub-stations and establishment of central data center for energy accounting has been completed. DSM settlement is being carried out by this software on meter data provided by UPCL/UJVNL/open access customers from meters installed at UPCL/UJVNL/open access customers end.

As regards to the Standardization of scheduling and Dispatch procedures, the Petitioner submitted that this procedure shall apply to all long term/medium term and short-term open access transactions whether intra-state and/or inter-state. The communication of 'declaration of capability' (DC), 'generation or injection schedule' and 'drawl schedule' to SLDC shall be the primary responsibility of the generating station or beneficiary/licensee and open access customer, as the case may be.

Dispatch procedures govern the 'dispatch schedule' for 'generating stations and injecting entities' which typically comprises of MW as per 'drawl schedule' and MWh derived by apportioning MWh in DC in the ratio of 'MW in DC' and that declared in the 'drawl schedule'.

Further, there are requirements for data visibility and interfacing requirements at SLDC for making real-time data available at SLDC.

For effective utilization of the SLDC investments, all the Power Plants (including those owned by UJVNL Ltd.) should abide by the following:

- Install Remote Terminal Units (RTUs) which are capable of communication with LD Centres in IEC-104 Protocol.

- Install suitable Communication media for data transmission. The typical bandwidth requirement for real-time data communication is 64 kbps and depends upon data volume.
- IPP/ CPP/State-owned Power plants may be required by the Commission to submit complete proposal along with the schematic diagram for RTU installation and data communication with LD Centres.
- Integration of IPP/ CPP station data into the SCADA systems at SLDC and ALDC on IEC 104 protocol.
- Completion of all above should be under the scope and responsibility of IPP/ CPP /State-owned Power Station.
- SCADA system provided at nearest sub-station of PTCUL shall serve the purpose of monitoring/ control of power plant data/ operations at local level and also of visibility of real-time data at SLDC/ALDC.

SLDC aims to install RTUs at the UJVN Ltd.'s generating stations. These RTUs, post installation, will improve the existing communication system and enable access to real time data which will in turn, improve the maintenance of energy balance in the grid.

The other initiatives proposed to be taken up by SLDC are as follows:

- Tenders have been awarded for implementation of intra-state Energy Accounting mechanism in the State which includes installation of ABT compatible SEM meters and establishment of central data centres for energy accounting.
- SLDC has initiated the development of a module for implementing a web based ABT scheduling system.
- Development of application software for automation of functions pertaining to data archiving, retrieval and analytics in accordance with recommendation 8.16(h) of FOR's 2016 Report on Scheduling, Accounting, Metering and Settlement of Transactions in Electricity (SAMAST).

- SLDC will be using its LDCD fund to establish training and system studies facilities towards capacity and skill building of employees so as to enable them to carry out the specialized functions of SLDC as per the State Grid Code regulations, 2016.

PTCUL procured SCADA/EMS system, RTUs, PLCC/PABX and Auxiliary Power Supply System as part of SLDC Project. SLDC was established to improve the Power System Operations resulting in effective monitoring and control of power system in Uttarakhand. Under the project there are two phases:

- Phase-I included the establishment of one SLDC at Dehradun and two no. of Control Centers at Rishikesh and Kashipur and was completed before the Control Period FY 2016-17 to FY 2018-19.
- Phase-II covered the supply and laying of OPGW network over the existing line of PTCUL and installation of RTU and associated accessories at 132 kV and above sub-stations.

The work of laying down OPGW on around 900 km of transmission lines. The work of laying down OPGW of around 600 km has already been implemented and the balance work will be done in the upcoming Control Period.

The details of works proposed for the fourth Control Period are as follows:

Reliable Communication & Data Acquisition System for 132 kV & above sub-stations

Rapidly evolving technology and the constantly expanding transmission network has rendered the old PLCC based communication system obsolete. OPGW based communication will be able to support the upgraded Control Centres & New RTUs and will facilitate the automation of sub stations by enabling remote controlling. In view of the same, laying down of OPGW network over transmission lines was initiated under Phase II of the SLDC project. The Phase II is expected to be partially completed in the current Control Period. It will be continued in the upcoming Control Period and will cover two different work plans (1) laying of OPGW cable over existing transmission lines and (2) installation of RTUs at various sub-stations and Hydro generating stations. The OPGW project involves 953 km of optical fibers on the PTCUL Transmission network. Investment approval was accorded to the project by the Commission vide its Order dated March 8, 2018. The project is likely to be completed by March, 2024. The Table below shows the existing transmission lines over

which the OPGW is proposed to be installed and the corresponding length of network over each line:

Table 2.1: Details of OPGW works

S. No.	Name of the line	Length of the line (in ckt. km)
1.	132 kV Ranikhet-Almora	25
2.	132 kV Kashipur-Bazpur	16
3.	132 kV Majra-Bindal	9
4.	220 kV Maneri Bhali-II Chamba	38
5.	220 kV Khodri-Chibro	6
6.	132 kV Kichha-CPP (Lalkuan)	19
7.	132 kV Dehradun-Majra	16
8.	132 kV Kulhal-Dehradun	42
9.	132 kV Khodri-Dhakrani	22
10.	132 kV Dhakrani-Dhalipur	7
11.	132 kV Jwalapur-SIDCUL	4
12.	132 kV Chilla-Jwalapur	17
13.	132 kV Jaspur-Kalagarh	33
14.	132 kV Kashipur-Kashipur (400 kV)	5
15.	132 kV KVS- Kashipur	5
16.	132 kV Kalagarh-Kamangar	69
17.	132 kV Ramnagar-Kashipur	20
18.	132 kV Sitarganj-Khatima	33
19.	132 kV Dhalipur-Kulhal	6
20.	132 kV Roorkee-Laksar	27
21.	220 kV Maneri Bhali-I-Maneri Bhali-II	25
22.	132 kV Haldwani-Pantnagar	37
23.	132 kV Pithoragarh-Pithoragarh 220 kV (PGCIL)	15
24.	132 kV Majra-Purkul	23
25.	132 kV Dhalipur-Purkul	48
26.	132 kV Manglore-Roorkee	14
27.	220 kV Jhajra-Rishikesh	55
28.	132 kV Satpuli-Srinagar	20
29.	132 kV Satpuli -Kotdwar	47
30.	132 kV Kotdwar-Nazibabad	23
31.	132 kV Nazibabad-Chilla	50
32.	132 kV Bhagwanpur-Roorkee (LILO at Chudiyala)	20
33.	220 kV Mahuakheraganj-Kashipur	10
34.	132 kV Bhupatwala-Jwalapur	10
35.	132 kV Eldeco (Sitarganj)-Sitarganj	22
36.	132 kV Almora-Pithoragarh	115
	Total	953

The project "Installation of Remote Terminal Units (RTUs) at various sub-stations and Hydro generating stations" involves design, engineering, manufacturing, supply, installation, testing and commissioning of RTUs and associated accessories. The project covers 30 nos. of RTUs at sub-stations and hydro power plants. Detail of the work plan is as under:

Table 2.2: Work Plan of RTU Installation

SLDC Dehradun	
Sub SLDC Rishikesh	Sub SLDC Kashipur
Name of Sub-station	Name of Sub-station
400 kV S/s Srinagar	400 kV S/s Kashipur
400 kV S/s Rishikesh	220 kV S/s Mahuakhera Ganj
220 kV S/s Jhajhra	220 kV S/s Kamalwanganja
220 kV S/s Chamba	132 kV S/s Bazpur
220 kV S/s Rishikesh	132 kV S/s Bhowali
132 kV S/s Manglore	132 kV S/s Jaspur
132 kV S/s Bhupatwala	132 kV S/s Kathgodam
132 kV S/s Bindal	132 kV S/s Ramnagar
132 kV S/s Chudiyala	132 kV S/s Rudrapur
132 kV S/s Jwalapur	132 kV S/s Bageshwar
132 kV S/s Majra	132 kV S/s Jaffarpur
132 kV S/s Purkul	
132 kV S/s Satpuli	
132 kV S/s Simli	
132 kV S/s Laltappar	
132 kV S/s Srinagar	
220 kV S/s IIP Harawala	
132 kV S/s Bhagwanpur	
132 kV S/s Kotdwar	

Up-gradation of Control Centres

SLDC performs the critical task of managing the load in the State. Any lapse due to inadequacy of the system in place can lead to hindrance in the integrated operation of the power system of the State. It is necessary to improve the current IT system to accommodate increasing demands on the power system. The existing systems used in control centers are obsolete and require up-gradation. In view of the same, SLDC is proposing up-gradation of control centers. The major upgrades proposed are listed below:

Up-grading the Operating systems

- Currently, Windows XP is installed in the systems used by SLDC. Since Microsoft has cut off continuous support for Windows XP, the threat protection software are obsolete and the systems are vulnerable to network threats
- Also, the system architecture is 32 bit, which is old and obsolete. There is no support for both hardware as well as software. Hence, up-gradation is required for operating system as well as hardware and Application software.
- By upgrading the Operating systems to the latest version, regular security updates will be enabled which will ensure that the devices will be protected against all kinds of network threats.
- Hence, it is proposed to upgrade the Operating Systems at SLDC, Dehradun and the Control centres at Kashipur and Rishikesh.

Migration to IPv6 from IPv4

- Internet Protocol Version 4 has started to run into network space problems worldwide, weak security standards, inefficient network administration and inadequate privacy support.
- Migration to IPv6 will make adequate network space available, make administration more efficient and improve security and privacy support.
- Hence, it is proposed to migrate systems of SLDC, Dehradun and the Control centres at Kashipur and Rishikesh to IPv6 from IPv4.

Energy Accounting, Balancing & Settlement Mechanism

Keeping in view the necessity of robust energy accounting, balancing and settlement mechanisms, SLDC is working on an energy accounting and scheduling software and plans to develop advanced settlement mechanisms to increase its responsiveness and ensure grid stability and reliability.

To accommodate expansion in its workforce and capabilities, SLDC plans to acquire assets including office equipment, furniture etc. It also plans to expand its civil infrastructure and office spaces.

Based on the works discussed above, the project wise phasing of capital expenditure and capitalization for SLDC and SCADA for the ensuing Control Period is as given below:

Table 2.3: Phasing of Capitalisation submitted by SLDC (Rs. Crore)

S. No.	Name of the work	FY 2022-23	FY 2023-24	FY 2024-25	Total
1	Reliable Communication & Data Acquisition System for 132 kV & above sub-stations	15.89	7.95	13.62	37.46
2	Upgradation of SLDC	18.6	9.3	9.3	37.20
3	Establishment of Training & System Studies Facilities at LD Centre	0.25	0.75	0.5	1.50
4	Energy Accounting Balancing & Settlement Mechanism	0.42	1.25	0.83	2.50
5	Infrastructural Development	0.04	0.08	0.1	0.22
6	Backup of SLDC Building at 400 KV Kashipur	0.26	0.65	0.39	1.30
7	Sub-station display unit (LDMS)	0.15	0.38	0.22	0.75
8	Remote Terminal Unit	0.3	0.75	0.45	1.50
9	Phasor Measurement Unit	0.66	1.64	0.98	3.28
10	Weather Sensors	0.01	0.03	0.02	0.06
11	Auxiliary Power Supply system	0.26	0.64	0.38	1.28
12	Separate Earthing System for SCADA related equipments at all Sub Stations of Kumaon	0.06	0.16	0.1	0.32
13	Digital Power Line Carrier Communication	0.07	0.17	0.11	0.35
14	Testing Equipment (OTDR, Optical Power Meter, Level Meter cum Level Generator, etc.)	0.08	0.21	0.13	0.42
15	Furnitures and Fixtures	0.01	0.03	0.02	0.06
	Total	37.06	23.99	27.15	88.20

Table 2.4: Phasing of Capital Expenditure as submitted by SLDC

Particulars	FY 2022-23	FY 2023-24	FY 2024-25	Total
Capital Expenditure	37.06	23.99	27.15	88.20

The capital investment plan for the fourth Control Period FY 2022-23 to FY 2024-25 has been made to have a robust backbone for acquisition of the real time, reliable and accurate data for energy accounting. It also aims to improve the control centres of SLDC.

2.4.2 Commission's Analysis

The Commission observed that the Petitioner did not submit the scheme-wise capital expenditure plan and directed the Petitioner to submit the same. The revised scheme-wise capital expenditure plan submitted by the Petitioner are as follows:

Table 2.5: Revised Capital Expenditure details submitted by SLDC (Rs. Crore)

S. No.	Name of the work	FY 2022-23	FY 2023-24	FY 2024-25	Total
1.	Reliable Communication & Data Acquisition System for 132 kV & above Sub-stations	22.48	7.49	7.49	37.46
2.	Upgradation of SLDC	22.32	7.44	7.44	37.20
3.	Establishment of Training & System Studies Facilities at LD Centre	0.90	0.30	0.30	1.50
4.	Energy Accounting Balancing & Settlement Mechanism	1.50	0.50	0.50	2.50
5.	Infrastructural Development	0.13	0.04	0.04	0.22
6.	Backup of SLDC Building at 400 KV Kashipur	0.78	0.26	0.26	1.30
7.	Sub-station display unit (LDMS)	0.45	0.15	0.15	0.75
8.	Remote Terminal Unit	0.90	0.30	0.30	1.50
9.	Phasor Measurement Unit	1.97	0.66	0.66	3.28
10.	Weather Sensors	0.04	0.01	0.01	0.06
11.	Auxiliary Power Supply system	0.77	0.26	0.26	1.28
12.	Separate Earthing System for SCADA related equipments at all Sub Stations of Kumaon	0.19	0.06	0.06	0.32
13.	Digital Power Line Carrier Communication	0.21	0.07	0.07	0.35
14.	Testing Equipment (OTDR, Optical Power Meter, Level Meter cum Level Generator, etc.)	0.25	0.08	0.08	0.42
15.	Furnitures and Fixtures	0.04	0.01	0.01	0.06
	Total	52.92	17.64	17.64	88.20

The Commission observed that the year-wise capital expenditure proposed in the Business Plan Petition and in the revised scheme-wise capital expenditure plan submitted by the Petitioner were not matching. The Commission asked the Petitioner to submit the reasons for the same. The Petitioner in its reply submitted that there was an inadvertent error in the year-wise capital expenditure proposed in the Business Plan Petition and, hence, requested to the Commission consider the revised submissions.

The Commission sought the preparedness to execute the capital works proposed and plan for monitoring the progress of execution during the fourth Control Period from FY 2022-23 to FY 2024-25. In reply to the same, SLDC submitted the following:

Table 2.6: Plan for monitoring the progress of execution of Capex Schemes details submitted by SLDC (Rs. Crore)

S. No.	Name of the work	FY 2022-23	FY 2023-24	FY 2024-25	Total	Preparedness	Funds Tie up	Order Placement
1.	Reliable Communication & Data Acquisition System for 132 kV & above Sub-stations	15.89	7.95	13.62	37.46	Tender is under process	PSDF (18.73 Cr grant)	No
2.	Upgradation of SLDC	18.6	9.3	9.3	37.20	DPR, BOQ, Estimation preparation are in progress in consultation with PGCIL.	PFC/REC/ADB	DPR, Estimation in progress.
3.	Establishment of Training & System Studies Facilities at LD Centre	0.25	0.75	0.5	1.50	Reframing of scope of work	LDCCD Fund	No
4.	Energy Accounting Balancing & Settlement Mechanism	0.42	1.25	0.83	2.50	Reframing of scope of work	LDCCD Fund	No

Table 2.6: Plan for monitoring the progress of execution of Capex Schemes details submitted by SLDC (Rs. Crore)

S. No.	Name of the work	FY 2022-23	FY 2023-24	FY 2024-25	Total	Preparedness	Funds Tie up	Order Placement
5.	Infrastructural Development	0.04	0.08	0.1	0.22	Reframing of scope of work	LDCC Fund	No
6.	Backup of SLDC Building at 400 KV Kashipur	0.26	0.65	0.39	1.30	DPR, BOQ, Estimation preparation are in progress.	PFC/REC/ADB	DPR, Estimation in progress.
7.	Sub-station display unit (LDMS)	0.15	0.38	0.22	0.75	DPR, BOQ, Estimation preparation are in progress.	PFC/REC/ADB	DPR, Estimation in progress.
8.	Remote Terminal Unit	0.3	0.75	0.45	1.50	DPR, BOQ, Estimation preparation are in progress.	PFC/REC/ADB	DPR, Estimation in progress.
9.	Phasor Measurement Unit	0.66	1.64	0.98	3.28	DPR, BOQ, Estimation preparation are in progress.	PFC/REC/ADB	DPR, Estimation in progress.
10.	Weather Sensors	0.01	0.03	0.02	0.06	DPR, BOQ, Estimation preparation are in progress.	PFC/REC/ADB	DPR, Estimation in progress.
11.	Auxiliary Power Supply system	0.26	0.64	0.38	1.28	DPR, BOQ, Estimation preparation are in progress.	PFC/REC/ADB	DPR, Estimation in progress.
12.	Separate Earthing System for SCADA related equipments at all Sub Stations of Kumaon	0.06	0.16	0.1	0.32	DPR, BOQ, Estimation preparation are in progress.	PFC/REC/ADB	DPR, Estimation in progress.
13.	Digital Power Line Carrier Communication	0.07	0.17	0.11	0.35	DPR, BOQ, Estimation preparation are in progress.	PFC/REC/ADB	DPR, Estimation in progress.
14.	Testing Equipment (OTDR, Optical Power Meter, Level Meter cum Level Generator, etc.)	0.08	0.21	0.13	0.42	DPR, BOQ, Estimation preparation are in progress.	PFC/REC/ADB	DPR, Estimation in progress.
15.	Furnitures and Fixtures	0.01	0.03	0.02	0.06	DPR, BOQ, Estimation preparation are in progress.	PFC/REC/ADB	DPR, Estimation in progress.
	Total	37.06	23.99	27.15	88.20			

The Commission noted that most of the projects proposed to be capitalised in FY 2022-23 are either at the tendering stage or DPR preparation stage. During the Technical Validation Session, the current status of these projects and likely date of capitalisation considering the current status of the following projects was discussed:

- **Reliable Communication & Data Acquisition System for 132 kV & above Sub-stations: (Rs. 15.89 Crore)-** Tender is under process
- **Upgradation of SLDC (Rs. 18.60 Crore) -** DPR, BOQ, Estimation preparation are in progress in consultation with PGCIL.

The Petitioner submitted that the duration of the above schemes will be of 18 months. Hence, the Commission directed the Petitioner to revise the submissions as per the current status of the

projects and revise the capitalization for the remaining years of the fourth control period accordingly.

In response, the Petitioner submitted that for the scheme '*Reliable Communication & Data Acquisition System for 132 kV & above Sub-stations*', the execution time of the tender is very short, and the tender process of major works is on with bidding closed and part -1 of tenders already opened. The tender is at the processing stage. Further, the Petitioner submitted the DPR for the scheme. Hence the Petitioner has not revised the proposed capitalisation.

As regards to the scheme '*Upgradation of SLDC*', the Petitioner submitted that the estimation preparation of work are in progress in consultation with PGCIL and the work shall commence in next few months and some amount shall be capitalised in FY 2022-23. Further, the Petitioner submitted that DPR will not be prepared for this work. Hence, the Petitioner has not revised the proposed capitalisation.

Regulation 21 of the UERC Tariff Regulations, 2021 stipulates as under:

"21. Capital Cost and capital structure

(1) The Capital cost as determined by the Commission after prudence check in accordance with this regulation shall form the basis of determination of tariff for existing and new projects of the Generating Company, Transmission Licensee, Distribution Licensee and SLDC.

..."

Considering the importance of the project, the Commission had accorded in principle approval for the project '*Reliable Communication & Data Acquisition System*' with a total project cost of Rs. 37.46 Crore in its Order dated March 8, 2018. The Commission notes that the Petitioner has proposed the same scheme and has claimed the similar phase wise capital expenditure claimed in the previous control period as there was no substantial progress in the project during the previous Control Period. The Petitioner has claimed capitalisation of Rs. 37.46 Crore by FY 2024-25 towards the same. Considering the current status of the project, the Commission approves the capital expenditure and capitalization for this project as proposed by the Petitioner. **The Commission strictly directs the Petitioner to expedite the process of executing the project and capitalise the schemes as approved in the current Order.**

For the scheme '*Upgradation of SLDC*', the Commission, after considering the response of the Petitioner, is of the view that the project may get commissioned near to fourth quarter of FY 2022-

23, hence, only small amount with regard to the scheme can be capitalised in FY 2022-23. Considering the current status of execution of the Project, the Commission decides to consider the Petitioner's claim of capitalisation of Rs. 9.30 Crore for FY 2023-24 in FY 2022-23 and the Petitioner's claim of capitalisation of Rs. 18.60 Crore for FY 2022-23 in FY 2023-24.

Based on the analysis of capital expenditure schemes proposed by SLDC, the Commission is of the view that all the capital expenditure schemes are essential and important to strengthen the SLDC and to bring discipline in grid operations. Hence, the Commission for the purpose of the approval of Business Plan for the fourth Control Period from FY 2022-23 to FY 2024-25 has considered the year wise capital expenditure and capitalisation as proposed by the Petitioner. The Commission shall carry out the prudence check of the actual capitalisation while carrying out the truing up for the respective years.

The capital expenditure and capitalisation approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25 is shown in the Table below:

Table 2.7: Capital Investment Plan approved by the Commission (Rs. Crore)

S. No.	Name of the work	Capital Expenditure				Capitalisation			
		FY 2022-23	FY 2023-24	FY 2024-25	Total	FY 2022-23	FY 2023-24	FY 2024-25	Total
1.	Reliable Communication & Data Acquisition System for 132 kV & above Sub-stations	22.48	7.49	7.49	37.46	15.89	7.95	13.62	37.46
2.	Upgradation of SLDC	22.32	7.44	7.44	37.20	9.30	18.60	9.30	37.20
3.	Establishment of Training & System Studies Facilities at LD Centre	0.90	0.30	0.30	1.50	0.25	0.75	0.50	1.50
4.	Energy Accounting Balancing & Settlement Mechanism	1.50	0.50	0.50	2.50	0.42	1.25	0.83	2.50
5.	Infrastructural Development	0.13	0.04	0.04	0.22	0.04	0.08	0.10	0.22
6.	Backup of SLDC Building at 400 kV Kashipur	0.78	0.26	0.26	1.30	0.26	0.65	0.39	1.30
7.	Sub-station display unit (LDMS)	0.45	0.15	0.15	0.75	0.15	0.38	0.22	0.75
8.	Remote Terminal Unit	0.90	0.30	0.30	1.50	0.30	0.75	0.45	1.50
9.	Phasor Measurement Unit	1.97	0.66	0.66	3.28	0.66	1.64	0.98	3.28
10.	Weather Sensors	0.04	0.01	0.01	0.06	0.01	0.03	0.02	0.06
11.	Auxiliary Power Supply system	0.77	0.26	0.26	1.28	0.26	0.64	0.38	1.28
12.	Separate Earthing System for SCADA related equipments at all Sub Stations of Kumaon	0.19	0.06	0.06	0.32	0.06	0.16	0.10	0.32
13.	Digital Power Line Carrier Communication	0.21	0.07	0.07	0.35	0.07	0.17	0.11	0.35
14.	Testing Equipment (OTDR, Optical Power Meter, Level Meter cum Level Generator, etc.)	0.25	0.08	0.08	0.42	0.08	0.21	0.13	0.42
15.	Furnitures and Fixtures	0.04	0.01	0.01	0.06	0.01	0.03	0.02	0.06
	Total	52.92	17.64	17.64	88.20	27.76	33.29	27.15	88.20

2.5 Financing Plan

2.5.1 Petitioner's Submissions

The approved cost of project "Reliable Communication & Data Acquisition System for 132 kV & above sub-stations" is Rs. 37.46 Crore. It is proposed to be funded through grant from PSDF and

debt from financial institutions in ratio of 50:50. Accordingly, Rs. 18.73 Crore shall be provided under PSDF and remaining Rs. 18.73 Crore will be raised as debt from financial institutions.

The projects titled “Backup of SLDC Building at 400 kV Kashipur S/s, Kashipur”, “Remote Terminal Units” and “Phasor Measurement Unit” are proposed to be funded 100% through grant from PSDF.

The projects titled “Development of Application Software for Operator Assistance”, “Energy Accounting Balancing & Settlement Mechanism” and “Infrastructural Development” are proposed to be completed by utilizing the amount in the LDCD fund over the coming Control Period.

The remaining projects are proposed to be funded by loans from different financial institutions for 70% of the project cost and by equity for 30% of the estimated project cost.

2.5.2 Commission’s Analysis

Regulation 24 of the UERC Tariff Regulations, 2021 specifies as follows:

“24. Debt-equity ratio

(1) For a project declared under commercial operation on or after 1.4.2022, debt-equity ratio shall be 70:30. Where equity employed is more than 30%, the amount of equity for the purpose of tariff shall be limited to 30% and the balance amount shall be considered as normative loan. Where actual equity employed is less than 30%, the actual equity would be used for determination of Return on Equity in tariff computations.

...”

Regulation 98 of the UERC Tariff Regulations, 2021 specifies as follows:

“98. LDC Development Fund:

- (1) The SLDC shall create and maintain a separate fund called ‘Load Despatch Centre Development Fund’ (“LDCD Fund”).*
- (2) All the other income of SLDC like short term open access charges, registration charges, scheduling and operating charges, etc. shall be deposited into LDCD Fund.*
- (3) The SLDC shall be entitled to utilise the money available in the LDCD Fund for creation of new assets, meeting stipulated equity portion in asset creation, margin money for raising loan from the financial institutions and funding of R&D projects.*

...

(6) SLDC shall submit the amount accumulated in LDC development fund along with the break-up of sources from where the fund is received. The Commission shall review the LDC development fund every year and issue directions to SLDC for effective utilization of the funds, if required."

The Commission has approved the means of finance as proposed by the Petitioner, for all the works. The estimated funds available in LDCD fund as on April 1, 2022, as submitted by SLDC shall be approximately Rs. 9.78 Crore. SLDC has proposed to finance the capital expenditure of Rs. 4.22 Crore from LDCD fund during the fourth Control Period which includes Rs. 1.50 Crore towards "Development of Application Software for Operator Assistance", Rs. 2.50 Crore towards "Energy Accounting Balancing & Settlement Mechanism" and Rs. 0.22 Crore towards "Infrastructural Development". The Financing Plan approved by the Commission is shown in the Table below:

Table 2.8: Financing Plan approved by the Commission

Particulars	FY 2022-23		FY 2023-24		FY 2024-25	
	Claimed	Approved	Claimed	Approved	Claimed	Approved
Capitalisation (Rs. Crore)	37.06	27.76	23.99	33.29	27.15	27.15
Debt (Rs. Crore)	19.03	12.52	10.43	16.94	11.96	11.96
Equity (Rs. Crore)	8.16	5.37	4.47	7.26	5.13	5.13
LDCD Fund (Rs. Crore)	0.71	0.71	2.08	2.08	1.43	1.43
Grants (Rs. Crore)	9.17	9.17	7.02	7.02	8.63	8.63
Debt (%)	51.35%	45.10%	43.46%	50.88%	44.06%	44.06%
Equity (%)	22.01%	19.33%	18.63%	21.80%	18.88%	18.88%
LDCD Fund (%)	1.92%	2.56%	8.67%	6.25%	5.27%	5.27%
Grants (%)	24.73%	33.02%	29.24%	21.07%	31.79%	31.79%

2.6 Human Resources Plan

2.6.1 Petitioner's Submissions

The HR plan for the fourth Control Period from FY 2022-23 to FY 2024-25 as submitted by the Petitioner is as shown in the Table below:

Table 2.9: HR Plan as submitted by the Petitioner

Particulars	FY 2022-23	FY 2023-24	FY 2024-25
Opening no. of employees	39	70	70
Recruitment during the year	31	0	0
Retirement during the year	0	0	0
Closing no. of employees	70	70	70

2.6.2 Commission's Analysis

The Commission directed SLDC to submit the current status of the recruitment process and preparedness for the proposed recruitment plan of 31 nos. of employees in FY 2022-23. In reply, SLDC submitted that in continuation to approval granted regarding sanctioning of 51 nos. of employees for SLDC by 65th BoD a letter No. 52/HR & Admn. /PTCUL/G-4 dated July 20, 2021, was sent to Secretary (Energy), GoU for approval. Out of these 51 nos. of employees, 31 nos. of employees would be recruited in FY 2022-23 for SLDC subject to the approval of GoU.

Recently 40 nos. of JE (E&M) have joined on December 23, 2021, amongst which 03 nos. of JE's were posted in SLDC. Further, 04 nos. of Accounts Officer are likely to join in January, 2022. As per proposed recruitment plan from FY 2022-23 to 2024-25, some of the new recruits would be posted at SLDC as per the work requirement.

The Commission further directed SLDC to provide the current status of the approval of GoU. In reply SLDC submitted that in the 78th BoD held on December 13, 2021, it was directed that a Committee along with 03 officers of PTCUL would be constituted to review/analysis the manpower structure of SLDC. It further submitted that after reviewing the staff requirement of SLDC by the Committee, the revised structure would be placed before BoD for approval. The same will be forwarded to GoU for further sanctioning of revised staff structure for SLDC. The Petitioner also submitted that the expected time of actual recruitment would be within 09 months of sanctioning of staff structure of SLDC from GoU and the likely date of joining of employees would be in the last quarter of FY 2022-23 subject to the aforesaid approval of GoU in time.

Considering the current progress of recruitment, it appears to be unlikely that all the proposed employees will be recruited in FY 2022-23. Hence, the Commission has not considered any recruitment during FY 2022-23. Further, the no. of employees proposed for recruitment in this control period has been proportionately approved in the last two years of the control period, i.e. FY 2023-24 and FY 2024-25. The Petitioner shall put in all efforts for meeting the proposed recruitment

of employees during each year of the fourth Control Period from FY 2022-23 to FY 2024-25. The Commission shall consider the actual recruitment and retirement status during the truing up for the respective years. Accordingly, the HR Plan approved by the Commission is shown in the Table below:

Table 2.10: HR Plan approved by the Commission

Particulars	FY 2022-23	FY 2023-24	FY 2024-25
Opening no. of employees	32	32	47
Recruitment during the year	0	15	16
Retirement during the year	0	0	0
Closing no. of employees	32	47	63

3 Petitioner's Submission, Commission's Analysis, Scrutiny and Conclusion on APR for FY 2021-22 and MYT for the fourth Control Period.

3.1 Annual Performance Review for FY 2021-22

Regulation 12(1) of the UERC Tariff Regulations, 2018 specifies that under the MYT framework, the performance of the SLDC shall be subject to Annual Performance Review.

Regulation 12(3) of the UERC Tariff Regulations, 2018 specifies as under:

"The scope of the Annual Performance Review shall be a comparison of the actual performance of the Applicant with the approved forecast of Aggregate Revenue Requirement and expected revenue from tariff and charges and shall comprise the following:

- a) A comparison of the audited performance of the applicant for the previous financial year with the approved forecast for such previous financial year and truing up of expenses and revenue subject to prudence check including pass through of impact of uncontrollable factors;*
- b) Categorization of variations in performance with reference to approved forecast into factors within the control of the applicant (controllable factors) and those caused by factors beyond the control of the applicant (un-controllable factors).*
- c) Revision of estimates for the ensuing financial year, if required, based on audited financial results for the previous financial year;*
- d) Computation of sharing of gains and losses on account of controllable factors for the previous year."*

The Commission vide its Order dated February 27, 2019, had approved the Business Plan and Multi Year Tariff for SLDC for the third Control Period from FY 2019-20 to FY 2021-22 alongwith the Annual Performance Review for FY 2018-19. Further, the Commission vide its Order dated April 18, 2020, and Order dated April 26, 2021, had approved the Annual Performance Review for FY 2019-20 and for FY 2020-21 respectively.

SLDC has filed this Petition for Annual Performance Review for FY 2021-22 and MYT Tariff for the fourth Control Period from FY 2022-23 to FY 2024-25. SLDC and SCADA work as separate independent units within PTCUL with separate accounting heads created for recording their income and expenses. SLDC has still not been incorporated as a separate company and, hence, the

accounts of SLDC are audited as part of PTCUL's accounts and no separate audited account of SLDC exists. The actual income and expenses of SLDC for FY 2020-21 are part of income and expenses of PTCUL and are included in PTCUL's audited accounts. SLDC requested the Commission to exempt it from filing separate true up for FY 2020-21 as no separate audited accounts are available for SLDC for FY 2020-21. SLDC submitted that the APR for FY 2021-22 and MYT for the fourth Control Period from FY 2022-23 to FY 2024-25 is being submitted in the instant Petition.

The Commission in its Order dated April 5, 2016, on approval of the Business Plan and MYT for the second Control Period from FY 2016-17 to FY 2018-19 directed as under:

"Hence, the Commission is of the opinion that as accounting of SLDC and SCADA is being done separately, accordingly, SLDC is directed to start preparing its annual statement of accounts separately from FY 2016-17 onwards in accordance with the requirement of the Regulations as referred above."

The Commission in its Order dated March 29, 2017, on approval of APR for FY 2016-17 and revised ARR for FY 2017-18 directed as under:

"The Commission directs SLDC that the provisions of the UERC Tariff Regulations, 2015 has to be complied strictly by SLDC regarding maintenance of its expenses related to operation of SLDC. The Commission also directs the SLDC to file the Petition seeking truing up of FY 2016-17 along with the APR of FY 2017-18 in accordance with the MYT Regulations, 2015."

The Commission vide its Tariff Order for FY 2018-19 dated March 21, 2018, directed the Petitioner to get the Transfer Scheme finalized and to submit the same to the Commission along with its Petition for Annual Performance Review for FY 2018-19.

The Commission in its Order dated February 27, 2019, on approval of MYT of FY 2019-20 to FY 2021-22 directed as under:

*"The Commission expresses its extreme displeasure in the lackadaisical approach of the Petitioner in not acting responsibly in finalizing the value of transferred assets from UPCL. **In this regard, the Commission holds that any consequential impact due to finalization of transfer scheme will be allowed without any carrying cost on the same as the delay is on the part of the Petitioner.***

(Emphasis added)"

The Commission in its Order dated April 18, 2020, on approval of ARR of FY 2020-21 directed as under:

"The Commission once again directs SLDC that the provisions of the UERC Tariff Regulations, 2018 have to be complied strictly by SLDC regarding maintenance of its expenses related to operation of SLDC. The Commission also directs SLDC to file the Petition seeking truing up of FY 2019-20 along with the APR of FY 2020-21 in accordance with the MYT Regulations, 2018 failing which action may be initiated against it under the provisions of the Act."

The Commission in its Order dated April 26, 2021, on approval of ARR of FY 2021-22 directed as under:

"The Commission once again directs SLDC that the provisions of the UERC Tariff Regulations, 2018 has to be complied strictly by SLDC regarding maintenance of its expenses related to the operation of SLDC. The Commission also directs SLDC to file the Petition seeking truing up of FY 2020-21 along with the APR of FY 2021-22 in accordance with the MYT Regulations, 2018 failing which action may be initiated against it under the provisions of the Act. SLDC is also directed to submit quarterly status to the Commission regarding the efforts made for ring fencing of SLDC within 15 days from the end of each quarter."

The Petitioner in the instant Petition submitted that the process of ring fencing of SLDC is underway and several concrete steps have been taken by PTCUL in this direction. Since, the accounts of SLDC and SCADA are audited with accounts of PTCUL ipso-facto being part of PTCUL's accounts, SLDC is unable to file a separate true up Petition for FY 2020-21. The Petitioner is filing the APR for FY 2021-22 and ARR Petition for the fourth Control Period of FY 2022-23 to FY 2024-25 based on the monthly trial balance for SLDC and SCADA. As the audited accounts for SLDC are not prepared separately for FY 2020-21, the Commission is unable to carry out the truing up of SLDC for FY 2020-21 separately. Accordingly, the truing up of expenses and revenues of SLDC for FY 2020-21 has been done as part of truing up of PTCUL.

The Commission had been repeatedly directing SLDC for completion of ring fencing of SLDC and SCADA. Even after repeated directions, it has been submitted that the said process is still in progress. **The Commission once again directs SLDC that the provisions of the UERC Tariff Regulations, 2018 has to be complied strictly by SLDC regarding maintenance of its expenses related to the operation of SLDC. The Commission also directs SLDC to file the Petition seeking**

truing up of FY 2021-22 along with the APR of FY 2022-23 in accordance with the MYT Regulations, 2018 failing which action may be initiated against it under the provisions of the Act. SLDC is also directed to submit quarterly status to the Commission regarding the efforts made for ring fencing of SLDC within 15 days from the end of each quarter.

The Commission in this Order has approved the MYT for the fourth Control Period from FY 2022-23 to FY 2024-25 based on the GFA approved for FY 2020-21, revised GFA for FY 2021-22 and additional capitalisation for each year of the fourth Control Period as discussed in Chapter 2 of this Order. The approach adopted by the Commission in approving the ARR for fourth Control Period is elaborated in the subsequent Sections of this Order.

3.1.1 GFA base for FY 2021-22

The Petitioner submitted that the opening GFA for FY 2021-22 has been considered as per the Monthly Trial Balance for SLDC and SCADA divisions. The Petitioner submitted that it has capitalised the net assets of around Rs. 4.59 Crore as per the annual audited accounts for PTCUL for FY 2020-21.

The Petitioner has considered the opening GFA for FY 2021-22 as Rs. 39.04 Crore. The Petitioner has proposed the GFA addition of Rs. 2.00 Crore in FY 2021-22. Accordingly, the Petitioner has claimed the closing GFA for FY 2021-22 as Rs. 41.04 Crore.

The Commission, vide its Tariff Order for FY 2021-22 dated April 26, 2021, had approved the opening GFA for FY 2021-22 as Rs. 34.51 Crore based on the estimated GFA addition of Rs. 0.06 Crore in FY 2020-21. However, the actual net GFA addition in FY 2020-21 is Rs. 0.10 Crore against the Petitioner's claim of Rs. 4.59 Crore. Accordingly, the Commission, in this Order, has approved the opening GFA for FY 2021-22 as Rs. 34.55 Crore. The Petitioner has proposed the capitalisation of Rs. 2.00 Crore in FY 2021-22. The Commission for the purpose of this Order, has considered the capitalisation proposed by the Petitioner for FY 2021-22. However, the actual capitalisation shall be considered based on the prudence check at the time of true up for FY 2021-22. Accordingly, the Commission has approved the closing GFA for FY 2021-22 as Rs. 36.55 Crore.

In accordance with Regulation 12(3) of the UERC Tariff Regulations, 2018, the scope of annual performance review does not provide for the revision of estimates for the current year and give effect on this account in the estimates of the ensuing year. The Commission shall carry out the truing up of FY 2021-22 based on the audited accounts for FY 2021-22 and give effect to this account

in the revised ARR of FY 2023-24 in accordance with Regulation 12(3) of the UERC Tariff Regulations, 2018. The Commission has computed certain expenses for FY 2021-22 based on the revised GFA for FY 2021-22 only to facilitate the computations for the ensuing Control Period from FY 2022-23 to FY 2024-25.

3.2 Capitalisation during the fourth Control Period

The Petitioner has proposed the capitalisation of Rs. 37.06 Crore, Rs. 23.99 Crore and Rs. 27.15 Crore for FY 2022-23, FY 2023-24 and FY 2024-25 respectively as per the Capitalisation Plan submitted in its Petition for approval of Business Plan for the fourth Control Period from FY 2022-23 to FY 2024-25.

The Commission, in the approval of Business Plan for the fourth Control Period from FY 2022-23 to FY 2024-25 as discussed in Chapter 2 has approved the capitalisation of Rs. 27.76 Crore, Rs. 33.29 Crore and Rs. 27.15 Crore for FY 2022-23, FY 2023-24 and FY 2024-25 respectively. The Commission has considered the year wise capitalisation for the fourth Control Period from FY 2022-23 to FY 2024-25 as approved in the Business Plan. The GFA base approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25 is as shown in the Table below:

Table 3.1: GFA base approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25 (Rs. Crore)

Particulars	FY 2022-23		FY 2023-24		FY 2024-25	
	Claimed by SLDC	Approved	Claimed by SLDC	Approved	Claimed by SLDC	Approved
Opening GFA	41.04	36.55	78.10	64.31	102.09	97.60
GFA addition during the year	37.06	27.76	23.99	33.29	27.15	27.15
Closing GFA	78.10	64.31	102.09	97.60	129.24	124.74

3.3 Debt-equity ratio

The Petitioner has proposed the Debt-equity ratio of the proposed capitalisation during the fourth Control Period as per the Financing Plan submitted in its Petition for approval of the Business Plan for the fourth Control Period from FY 2022-23 to FY 2024-25.

The Commission, in the approval of Business Plan for the fourth Control Period from FY 2022-23 to FY 2024-25 as discussed in Chapter 2 has approved the Financing Plan of the approved capitalisation during the fourth Control Period. The Commission has considered the Financing Plan for the fourth Control Period from FY 2022-23 to FY 2024-25 as approved in the Business Plan. The

Debt and Equity of approved capitalisation during the fourth Control Period is as shown in the Table below:

Table 3.2: Financing Plan approved by the Commission

Particulars	FY 2022-23		FY 2023-24		FY 2024-25	
	Claimed by SLDC	Approved	Claimed by SLDC	Approved	Claimed by SLDC	Approved
Debt (Rs. Crore)	19.03	12.52	10.43	16.94	11.96	11.96
Equity (Rs. Crore)	8.16	5.37	4.47	7.26	5.13	5.13
LD CD Fund (Rs. Crore)	0.71	0.71	2.08	2.08	1.43	1.43
Grants (Rs. Crore)	9.17	9.17	7.02	7.02	8.63	8.63
Capitalisation during the year (Rs Crore)	37.06	27.76	23.99	33.29	27.15	27.15
Debt (%)	51.35%	45.10%	43.46%	50.88%	44.06%	44.06%
Equity (%)	22.01%	19.33%	18.63%	21.80%	18.88%	18.88%
LD CD Fund (%)	1.92%	2.56%	8.67%	6.25%	5.27%	5.27%
Grants (%)	24.73%	33.02%	29.24%	21.07%	31.79%	31.79%
Total	100%	100%	100%	100%	100%	100%

3.4 Annual SLDC Charges

Regulation 99 of the UERC Tariff Regulations, 2021 specifies as follows:

“99. Annual SLDC Charges

The annual charges to be recovered by the SLDC shall include the component of Return on Equity and also the following expenses:

(a) O&M expenses;

(b) Return on Equity

(c) Depreciation;

(d) Lease Charges

(e) Interest and Finance charges on Loan Capital;

(f) Income Tax, if any;

(g) Interest on working capital, if any;

(h) Any other expenses incidental to discharging the functions of SLDC as deemed appropriate by the Commission;”

The Commission in this Order has approved the SLDC Charges for each year of the fourth

Control Period from FY 2022-23 to FY 2024-25 based on the GFA approved for FY 2020-21 for SLDC works in truing up for FY 2020-21 for PTCUL, revised GFA for FY 2021-22 and approved capitalisation for FY 2022-23 to FY 2024-25 in the Business Plan for SLDC.

3.4.1 Operation and Maintenance expenses

Regarding the Operation and Maintenance expenses, Regulation 100 of the UERC Tariff Regulations, 2021 specifies as follows:

“100. Operation and Maintenance Expenses

(1) *The O&M expenses for the first year of the Control Period will be approved by the Commission taking into account actual O&M expenses for last five years till Base Year subject to prudence check and any other factors considered appropriate by the Commission.*

(2) *The O&M expenses for the nth year and also for the year immediately preceding the Control Period, i.e. 2021-22, shall be approved based on the formula given below:-*

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

Where –

- *O&M_n – Operation and Maintenance expense for the nth year;*
- *EMP_n – Employee Costs for the nth year;*
- *R&M_n – Repair and Maintenance Costs for the nth year;*
- *A&G_n – Administrative and General Costs for the nth year;*

(3) *The above components shall be computed in the manner specified below:*

$$EMP_n = (EMP_{n-1}) \times (1+G_n) \times (1+CPI_{inflation})$$

$$R\&M_n = K \times (GFA_{n-1}) \times (1+WPI_{inflation}) \text{ and}$$

$$A\&G_n = (A\&G_{n-1}) \times (1+WPI_{inflation}) + \text{Provision}$$

Where –

- *EMP_{n-1} – Employee Costs for the (n-1)th year;*
- *A&G_{n-1} – Administrative and General Costs for the (n-1)th year;*
- *Provision: Cost for initiatives or other one-time expenses as proposed by the SLDC and validated by the Commission.*
- *‘K’ is a constant specified by the Commission in %. Value of K for each year of the Control Period shall be determined by the Commission in the MYT Tariff order based on SLDC’s filing, benchmarking of repair and maintenance expenses, approved repair and maintenance*

expenses vis-à-vis GFA approved by the Commission in past and any other factor considered appropriate by the Commission;

- *CPIinflation – is the average increase in the Consumer Price Index (CPI) for immediately preceding three years;*
- *WPIinflation – is the average increase in the Wholesale Price Index (CPI) for immediately preceding three years;*
- *GFA_{n-1} – Gross Fixed Asset of the transmission licensee for the n-1th year;*
- *G_n is a growth factor for the nth year and it can be greater than or less than zero based on the actual performance. Value of G_n shall be determined by the Commission in the MYT tariff order for meeting the additional manpower requirement based on SLDC's filings, benchmarking, and any other factor that the Commission feels appropriate:*

Provided that repair and maintenance expenses determined shall be utilised towards repair and maintenance works only."

The O&M expenses includes Employee expenses, R&M expenses and A&G expenses. In accordance with Regulation 100 of the UERC Tariff Regulations, 2021, the O&M expenses for the first year of the Control Period shall be determined by the Commission taking into account actual O&M expenses of the previous years and any other factors considered appropriate by the Commission. The submissions of the Petitioner and the Commission's analysis on the O&M expenses for the fourth Control Period from FY FY 2022-23 to FY 2024-25 is detailed below.

3.4.1.1 Employee expenses

The Commission had approved the employee expenses of Rs. 4.11 Crore for FY 2021-22 in its Order dated April 26, 2021 on approval of ARR for FY 2021-22. The Petitioner, in its Petition, has proposed the employee expenses for FY 2021-22 as Rs. 4.53 Crore.

In order to compute 'EMP_{n-1}', the Petitioner has averaged the 'adjusted' employee expenses net of capitalization for FY 2018-19 to FY 2020-21 to arrive at the employee expenses for the median year FY 2019-20. Thereafter, the employee expenses, thus arrived for FY 2019-20 have been escalated by the CPI inflation for past three years and growth factor for FY 2020-21 and FY 2021-22 to arrive at 'EMP_{n-1}', employee expenses for FY 2021-22. Further, the G_n (Growth Factor) has been considered for computation of the employee expenses based on the HR Plan submitted in the Business Plan. Accordingly, the Petitioner has proposed the employee expenses of Rs. 8.52 Crore, Rs. 8.93 Crore and Rs. 9.36 Crore for FY 2022-23, FY 2023-24 and FY 2024-25 respectively.

The UERC Tariff Regulations, 2021 stipulates the normative O&M expenses for the fourth Control Period to be approved taking into account the actual O&M expenses for FY 2016-17 to FY 2020-21. As SLDC is not yet incorporated as a separate entity, the Commission did not carry out the true up of SLDC separately. Further, the actual O&M expenses for some of the years during FY 2016-17 to FY 2020-21 also includes the impact of Seventh Pay Commission and arrears for the same.

Regulation 103(2) of the UERC Tariff Regulations, 2021 specifies as under:

“Nothing in these Regulations shall bar the Commission from adopting in conformity with provisions of the Act, a procedure which is at variance with any of the provisions of these Regulations, if the Commission, in view of the special circumstances of a matter or a class of matters, deems it just or expedient for deciding such matter or class of matters.”

Hence, in view of the special circumstances in this case, in exercise of powers conferred by the above stated Regulation, the Commission finds it prudent to deviate from the methodology stipulated in the UERC Tariff Regulations, 2021 for approval of normative employee expenses for the fourth Control Period from FY 2022-23 to FY 2024-25 to the extent of consideration of actual employee expenses for the preceding five years.

The Commission has considered the normative opening employee expenses of Rs. 3.90 Crore the same as approved in the Tariff Order for FY 2021-22. This normative opening employee expenses have been adjusted for the Gn factor approved for FY 2021-22 and escalated with CPI inflation of 6.00% to arrive at the normative employee expenses for FY 2021-22. The employee expenses so arrived have been considered as the employee expenses for FY 2021-22. From FY 2022-23 onwards, the Commission has computed the normative employee expenses in accordance with Regulation 100(3) considering the Gn factor approved for the corresponding year and the CPI inflation of 6.00%.

The Commission, in the approval of the Business Plan for the fourth Control Period from FY 2022-23 to FY 2024-25 as discussed in Chapter 2 has approved the HR Plan. Based on the approved HR Plan, the Commission has computed the ‘Gn’ factor as shown in the Table below:

Table 3.3: Gn approved by the Commission

Particulars	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Closing no. of employees	32	32	32	47	63
Gn	0%	0%	0%	47%	34%

The normative employee expenses approved by the Commission for the fourth Control

Period from FY 2022-23 to FY 2024-25 is as shown in the Table below:

Table 3.4: Employee expenses approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25 (Rs. Crore)

Particulars	FY 2022-23		FY 2023-24		FY 2024-25	
	Claimed by SLDC	Approved	Claimed by SLDC	Approved	Claimed by SLDC	Approved
EMP _{n-1}	4.53	4.13	8.52	4.38	8.93	6.82
Gn	79.49%	0%	0.00%	47.00%	0.00%	34.00%
CPI inflation	4.78%	6.00%	4.78%	6.00%	4.78%	6.00%
EMP _n =(EMP _{n-1}) x (1+Gn) x (1+CPIinflation)	8.52	4.38	8.93	6.82	9.36	9.69

3.4.1.2 R&M expenses

The Commission has approved the R&M expenses of Rs. 2.90 Crore for FY 2021-22 in its Order dated April 26, 2021 on approval of ARR for FY 2021-22. The Petitioner has proposed the R&M expenses for FY 2021-22 as Rs. 3.81 Crore. The Petitioner submitted the average WPI inflation of FY 2018-19 to FY 2020-21 as 2.41%.

The Petitioner submitted that a substantial portion of the assets of SLDC and SCADA division consists of electronic and IT based equipment. For the maintenance of such equipment, the Petitioner enters into Annual Maintenance Contracts (AMCs) through an open bidding process. However, for a few proprietary equipment, the AMC is carried out by OEM only. The cost of such AMC is usually a part of supply contract, which is entered into through open bidding process. The assets under AMCs have been excluded from the GFA for the purpose of projections of the R&M Expenses. Accordingly, to calculate 'GFA_{n-1}', the value of GFA under AMC for each year of the Control Period has been subtracted from the opening GFA of the respective year. The details of assets under AMC for FY 2022-23 along with GFA of the assets is provided in the Table below:

Table 3.5: Projected AMC Details for FY 2022-23 (Rs.)

S. No.	Name of Work/ Details of Asset	Original Cost of the Asset	Amount of AMC (Estimated)
1	AMC of SCADA system supplied under SCADA/EMS Project by M/s GE T&D India Ltd (formerly M/s Alstom) on single quotation basis.	4,69,52,045	81,00,000
2	AMC work of 05 nos. Battery Charger and Battery Bank at various location	17,75,399	4,25,000
3	AMC of PUNCOM make PLCC	62,14,538	4,14,000
4	AMC of OPGW installed under various ULDC projects of the Northern Region*		11,91,912
5a	AMC (with parts) of 08 nos. 2 Ton split AC installed at UPS battery Room of SCADA and 02 nos. of 1.5 Ton Split AC installed at Video Conferencing Room	55,00,000	6,48,000
5b	AMC (with parts) of AC system in Control Room and Server Room at SLDC Dehradun	27,81,717.00	3,28,241.00
6	AMC of auxiliary power equipment installed under various projects in ULDC NR *		5,20,000
	Total	6,04,41,981.00	1,12,98,912.00

* Installed/AMC by PGCIL

Accordingly, the value of assets under AMC works out to be Rs. 6.04 Crore. The cost of AMC for FY 2022-23 is estimated to be Rs. 1.13 Crore as shown in the Table above. The assets under AMC and the cost of AMC of the assets is assumed same for all the years of the Control Period.

The Petitioner has proposed the K factor of 7.89% considering the average of the ratio of actual R&M expenses and approved GFA for immediately preceding three years (FY 2018-19 to FY 2020-21). For calculation of R&M expenses for the fourth Control Period, the opening GFA of each year, net of GFA under AMC for the year is multiplied by K factor and WPI inflation. The AMC expenses for the respective year has been added to compute the total R&M expenses. Accordingly, the Petitioner has proposed the R&M expenses of Rs. 3.96 Crore, Rs. 6.95 Crore and Rs. 8.89 Crore for FY 2022-23, FY 2023-24 and FY 2024-25 respectively.

The Commission does not find the methodology proposed by the Petitioner for computing the normative R&M expenses to be prudent as it amounts to allowing the actual R&M expenses. The Commission has determined the R&M expenses for the fourth Control Period from FY 2022-23 to FY 2024-25 in accordance with UERC Tariff Regulations, 2021. The Commission has computed the percentage of actual R&M expenses upon approved opening GFA for each year of FY 2018-19 to FY 2020-21. Thereafter, the Commission has considered the average of such percentages as K factor which works out to 8.33%. The Commission has considered the opening GFA for each year of the fourth Control Period from FY 2022-23 to FY 2024-25. The Commission has considered the WPI inflation of 2.42% which is the average increase in the Wholesale Price Index (WPI) for FY 2018-19 to FY 2020-21.

The R&M expenses approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25 is shown in the Table below:

Table 3.6: R&M expenses approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25

Particulars	FY 2022-23		FY 2023-24		FY 2024-25	
	Claimed by SLDC	Approved	Claimed by SLDC	Approved	Claimed by SLDC	Approved
K	7.89%	8.33%	7.89%	8.33%	7.89%	8.33%
GFA _{n-1}	35.00	36.55	72.06	64.31	96.05	97.60
WPI inflation	2.41%	2.42%	2.41%	2.42%	2.41%	2.42%
$R\&M_n = K \times (GFA_{n-1}) \times (1 + WPI_{inflation})$	2.83	3.12	5.82	5.49	7.76	8.33
Add: AMC Fee	1.13	0.00	1.13	0.00	1.13	0.00
Total R&M expenses	3.96	3.12	6.95	5.49	8.89	8.33

3.4.1.3 A&G expenses

The Commission has approved the A&G expenses of Rs. 0.73 Crore for FY 2021-22 in its Order dated April 26, 2021 on approval of ARR for FY 2021-22. The Petitioner, in its Petition, has proposed the A&G expenses for FY 2021-22 as Rs. 1.75 Crore. The Petitioner submitted the average WPI inflation of FY 2018-19 to FY 2020-21 as 2.41%.

The Petitioner submitted that the average of the actual A&G Expenses, net of capitalisation for FY 2018-19, FY 2019-20 and FY 2020-21 has been considered as the value of A&G Expenses for the median year FY 2019-20. The estimated value of A&G expenses for FY 2021-22 has then been successively increased by the average of the WPI inflation for FY 2018-19, FY 2019-20 and FY 2020-21 (2.41%) for projecting the A&G expenses for the MYT Period. The Petition fee for respective year has been added to the projected A&G expenses to arrive at total A&G expenses for each year.

The UERC Tariff Regulations, 2021 stipulates the normative O&M expenses for the fourth Control Period to be approved taking into account the actual O&M expenses for FY 2016-17 to FY 2020-21. As SLDC is not yet incorporated as a separate entity, the Commission did not carry out the true up of SLDC separately.

Regulation 103(2) of the UERC Tariff Regulations, 2021 specifies as under:

"Nothing in these Regulations shall bar the Commission from adopting in conformity with provisions of the Act, a procedure which is at variance with any of the provisions of these Regulations, if the Commission, in view of the special circumstances of a matter or a class of matters, deems it just or expedient for deciding such matter or class of matters."

In view of the special circumstances in this case, in exercise of powers conferred by the above stated Regulation, the Commission finds it prudent to deviate from the methodology stipulated in the UERC Tariff Regulations, 2021 for approval of normative A&G expenses for the fourth Control Period from FY 2022-23 to FY 2024-25 to the extent of consideration of actual A&G expenses for the preceding five years.

The Commission has considered the normative A&G expenses approved in the Tariff Order for FY 2021-22, i.e. Rs. 0.71 Crore as the base A&G expenses. From FY 2022-23 onwards, the Commission has computed the normative A&G expenses in accordance with Regulation 100(3) considering the WPI inflation of 2.42%.

The normative A&G expenses approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25 is as shown in the Table below:

Table 3.7: A&G expenses approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25 (Rs. Crore)

Particulars	FY 2022-23		FY 2023-24		FY 2024-25	
	Claimed by SLDC	Approved	Claimed by SLDC	Approved	Claimed by SLDC	Approved
A&Gn-1	1.75	0.73	1.80	0.74	1.84	0.76
WPI inflation	2.41%	2.42%	2.41%	2.42%	2.41%	2.42%
Provision	0.00	0.00	0.00	0.00	0.00	0.00
A&Gn=A&Gn-1 x (1+WPIinflation) + Provision	1.80	0.74	1.84	0.76	1.88	0.78

3.4.1.4 O&M expenses

The O&M expenses approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25 is as shown in the Table below:

Table 3.8: O&M expenses approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25 (Rs. Crore)

Particulars	FY 2022-23		FY 2023-24		FY 2024-25	
	Claimed by SLDC	Approved	Claimed by SLDC	Approved	Claimed by SLDC	Approved
Employee expenses	8.52	4.38	8.93	6.82	9.36	9.69
R&M expenses	3.96	3.12	6.95	5.49	8.89	8.33
A&G expenses	1.80	0.74	1.84	0.76	1.88	0.78
Total O&M expenses	14.28	8.24	17.72	13.07	20.13	18.80

3.4.2 Return on Equity

The Petitioner has considered the opening Equity for FY 2022-23 as Rs. 11.98 Crore. The Petitioner has considered the equity addition during each year of the fourth Control Period from FY 2022-23 to FY 2024-25 equivalent to the equity portion of the proposed capitalisation for the respective year. The Petitioner has proposed the Return on Equity at the rate of 15.50% on the average equity for the year. Accordingly, the Petitioner has proposed the Return on Equity of Rs. 1.86 Crore, Rs. 3.12 Crore and Rs. 3.81 Crore for FY 2022-23, FY 2023-24 and FY 2024-25 respectively.

Regarding the Return on Equity, Regulation 26 of the UERC Tariff Regulations, 2021 specifies as follows:

“26. Return on Equity

(1) Return on equity shall be computed on the equity base determined in accordance with

Regulation 24.

Provided that, Return on Equity shall be allowed on amount of allowed equity capital for the assets put to use at the commencement of each financial year.

Provided further that, if the generating stations/licensees are able to demonstrate the actual date of asset being put to use and capitalized in its accounts of each asset for the purposes of business carried on by it through documentary evidence, including but not limited to 'asset put to use certificate', 'audited accounts' etc., then in such cases, after due satisfaction of the Commission, the RoE shall be allowed on pro-rata basis after considering additional capitalization done during the year out of the equity capital.

(2) Return on equity shall be computed on at the base rate of 15.50% for thermal generating stations, transmission licensee, SLDC..."

The Commission has considered the closing equity balance of FY 2020-21 as the opening equity balance for FY 2021-22 and the closing equity balance for FY 2021-22 has been considered as the opening equity balance for FY 2022-23. The Commission has considered the equity addition during each year of the fourth Control Period from FY 2022-23 to FY 2024-25 as per the approved Financing Plan.

In accordance with the Regulations, Return on Equity is allowable on the opening equity for the year. Hence, the Commission has determined the Return on Equity for each year of the fourth Control Period from FY 2022-23 to FY 2024-25 considering the eligible opening equity for return for the respective year. As the proviso to the Regulations provides that if the licensees are able to demonstrate the actual date of asset being put to use and capitalised in its accounts of each asset for the purposes of business carried on by it through documentary evidence, then Return on Equity shall be allowed on pro-rata basis considering additional capitalisation done during the year. However, at this stage it cannot be projected when the asset will be capitalised. The Commission may consider the Return on Equity on pro-rata basis at the time of truing-up if complete details as per proviso to Regulations are submitted by the Petitioner.

The Return on Equity approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25 is as shown in the Table below:

Table 3.9: Return on Equity approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25 (Rs. Crore)

Particulars	FY 2022-23		FY 2023-24		FY 2024-25	
	Claimed by SLDC	Approved	Claimed by SLDC	Approved	Claimed by SLDC	Approved
Opening Equity	11.98	10.63	20.13	15.99	24.60	23.25
Addition during the year	8.16	5.37	4.47	7.26	5.12	5.13
Closing Equity	20.13	15.99	24.60	23.25	29.73	28.38
Rate of Return	15.50%	15.50%	15.50%	15.50%	15.50%	15.50%
Return on Equity	1.86	1.65	3.12	2.48	3.81	3.60

3.4.3 Depreciation

The Petitioner submitted that the asset class wise depreciation has been computed considering the proposed GFA for each year of the fourth Control Period from FY 2022-23 to FY 2024-25 and based on the rates of depreciation specified in the UERC Tariff Regulations, 2021. Accordingly, the Petitioner has proposed the depreciation of Rs. 4.51 Crore, Rs. 5.68 Crore and Rs. 6.58 Crore for FY 2022-23, FY 2023-24 and FY 2024-25 respectively. Regulation 28 of the UERC Tariff Regulations, 2021 specifies as follows:

"28. Depreciation

(1) The value base for the purpose of depreciation shall be the capital cost of the asset admitted by the Commission.

Provided that no depreciation shall be allowed on assets funded through Consumer Contribution and Capital Subsidies/Grants.

(2) The salvage value of the asset shall be considered as 10% and depreciation shall be allowed up to maximum of 90% of the capital cost of the asset.

...

(4) Depreciation shall be calculated annually based on Straight Line Method and at rates specified in Appendix - II to these Regulations.

..."

Further, Regulation 98(5) of the UERC Tariff Regulations, 2021 specifies as follows:

"Any asset created by the SLDC out of the money deposited into the LDCC Fund shall not be entitled for return on equity, interest on loan and depreciation on same principles as in case of grant. SLDC shall submit details of such assets in the CAPEX plan."

The Commission has determined the depreciation for the fourth Control Period from FY 2022-23 to FY 2024-25 considering the approved GFA base and asset class wise rates of depreciation specified in UERC Tariff Regulations, 2021. The depreciation approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25 is as shown in the Table given below:

Table 3.10: Depreciation approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25 (Rs. Crore)

Particulars	FY 2022-23		FY 2023-24		FY 2024-25	
	Claimed by SLDC	Approved	Claimed by SLDC	Approved	Claimed by SLDC	Approved
Depreciation	4.51	3.95	5.68	5.15	6.58	6.35

3.4.4 Interest on Loan

The Petitioner has considered the opening loan balance for FY 2022-23 as Rs. 8.86 Crore. The Petitioner has considered the loan addition during each year of the fourth Control Period from FY 2022-23 to FY 2024-25 equivalent to the loan portion of the proposed capitalisation for the respective year. The Petitioner has considered the normative repayment for each year equivalent to the depreciation for the year. The Petitioner has proposed the interest on loan by applying the interest rate of 10.94% on the average loan for the year. Accordingly, the Petitioner has proposed the interest on loan of Rs. 1.76 Crore, Rs. 2.82 Crore and Rs. 3.37 Crore for FY 2022-23, FY 2023-24 and FY 2024-25 respectively.

Regulation 27 of the UERC Tariff Regulations, 2021 specifies as follows:

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

- (1) The loans arrived at in the manner indicated in Regulation 24 shall be considered as gross normative loan for calculation of interest on loan.*
- (2) The normative loan outstanding as on 01.04.2022 shall be worked out by deducting the cumulative repayment as admitted by the Commission up to 31.03.2022 from the approved gross normative loan.*
- (3) The repayment for each year of the Control Period shall be deemed to be equal to the depreciation allowed for that year ...*

(5) The rate of interest shall be the weighted average rate of interest calculated on the basis of the actual loan portfolio of the previous year after providing appropriate accounting adjustment for interest capitalised:

...

(6) The interest on loan shall be calculated on the normative average loan of the year by applying the weighted average rate of interest.

..."

The Commission has considered the approved closing loan balance of FY 2020-21 as opening loan balance for FY 2021-22. The Commission has considered the depreciation for FY 2021-22 as the normative repayment for the year. The Commission has considered the closing loan balance for FY 2021-22 as the opening loan balance for FY 2022-23. The Commission has considered the loan addition during each year of the fourth Control Period from FY 2022-23 to FY 2024-25 as per the approved Financing Plan. The Commission has considered the normative repayment equivalent to the approved depreciation for each year of the fourth Control Period from FY 2022-23 to FY 2024-25. The Commission has considered the interest rate of 10.94% which is the actual rate of interest for FY 2020-21. The Commission has determined the interest on loan by applying the interest rate of 10.94% on the average loan balance for each year of the fourth Control Period from FY 2022-23 to FY 2024-25. The interest on loan approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25 is as shown in the Table given below:

Table 3.11: Interest on Loan approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25 (Rs. Crore)

Particulars	FY 2022-23		FY 2023-24		FY 2024-25	
	Claimed by SLDC	Approved	Claimed by SLDC	Approved	Claimed by SLDC	Approved
Opening loan	8.86	9.46	23.39	18.03	28.13	29.82
Addition	19.03	12.52	10.43	16.94	11.96	11.96
Repayment	4.51	3.95	5.68	5.15	6.58	6.35
Closing loan	23.39	18.03	28.13	29.82	33.50	35.43
Average loan	16.12	13.74	25.76	23.92	30.82	32.63
Rate of interest	10.94%	10.94%	10.94%	10.94%	10.94%	10.94%
Interest	1.76	1.50	2.82	2.62	3.37	3.57

3.4.5 Interest on Working Capital

The Petitioner has submitted that the interest on working capital for the fourth Control Period from FY 2022-23 to FY 2024-25 has been proposed in accordance with UERC Tariff Regulations, 2021. Accordingly, the Petitioner has proposed the IWC of Rs. 0.76 Crore, Rs. 0.96

Crore and Rs. 1.11 Crore for FY 2022-23, FY 2023-24 and FY 2024-25 respectively.

The Commission has determined the interest on working capital for the fourth Control Period in accordance with the UERC Tariff Regulations, 2021.

3.4.5.1 One Month O&M Expenses

The annual O&M expenses approved by the Commission are Rs. 8.24 Crore, Rs. 13.07 Crore and Rs. 18.80 Crore for FY 2022-23, FY 2023-24 and FY 2024-25 respectively. Based on the approved O&M expenses, one month's O&M expenses works out to Rs. 0.69 Crore, Rs. 1.09 Crore and Rs. 1.57 Crore for FY 2022-23, FY 2023-24 and FY 2024-25 respectively.

3.4.5.2 Maintenance Spares

The Commission has considered the maintenance spares as 15% of O&M expenses in accordance with UERC Tariff Regulations, 2021, which works out to Rs. 1.24 Crore, Rs. 1.96 Crore and Rs. 2.82 Crore for FY 2022-23, FY 2023-24 and FY 2024-25 respectively.

3.4.5.3 Receivables

The Commission has approved the receivables for two months based on the approved SLDC Charges of Rs. 15.82 Crore, Rs. 24.05 Crore and Rs. 33.36 Crore for FY 2022-23, FY 2023-24 and FY 2024-25 respectively, which works out to Rs. 2.64 Crore, Rs. 4.01 Crore, Rs. 5.56 Crore for FY 2022-23, FY 2023-24 and FY 2024-25 respectively.

Based on the above, the total working capital requirement of the Petitioner for FY 2022-23, FY 2023-24 and FY 2024-25 works out to Rs. 4.56 Crore, Rs. 7.06 Crore and Rs. 9.95 Crore respectively. The Commission has considered the rate of interest on working capital as 10.50% equal to State Bank Advance Rate (SBAR) of State Bank of India as on the date of filing of the MYT Petition and, accordingly, the interest on working capital works out to Rs. 0.48 Crore, Rs. 0.74 Crore, Rs. 1.04 Crore for FY 2022-23, FY 2023-24 and FY 2024-25 respectively. The interest on working capital approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25 is as shown in the Table below:

Table 3.12: Interest on working capital approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25 (Rs. Crore)

Particulars	FY 2022-23		FY 2023-24		FY 2024-25	
	Claimed by SLDC	Approved	Claimed by SLDC	Approved	Claimed by SLDC	Approved
O&M expenses for 1 month	1.19	0.69	1.48	1.09	1.68	1.57
Maintenance Spares	2.14	1.24	2.66	1.96	3.02	2.82
Receivables equivalent to 2 months	3.86	2.64	5.05	4.01	5.83	5.56
Working Capital	7.19	4.56	9.19	7.06	10.53	9.95
Rate of Interest on Working Capital	10.50%	10.50%	10.50%	10.50%	10.50%	10.50%
Interest on Working Capital	0.76	0.48	0.96	0.74	1.11	1.04

3.4.6 Non-Tariff Income

The Petitioner has not proposed any non-tariff income. The Commission has not considered any non-tariff income in this Order. The actual non-tariff income shall be considered at the time of true up for the respective year of the fourth Control Period.

3.4.7 SLDC Charges

Based on the above, the SLDC Charges approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25 is as shown in the following Table:

Table 3.13: SLDC Charges approved by the Commission for the fourth Control Period from FY 2022-23 to FY 2024-25 (Rs. Crore)

Particulars	FY 2022-23		FY 2023-24		FY 2024-25	
	Claimed by SLDC	Approved	Claimed by SLDC	Approved	Claimed by SLDC	Approved
O&M expenses	14.28	8.24	17.72	13.07	20.13	18.80
Return on Equity	1.86	1.65	3.12	2.48	3.81	3.60
Depreciation	4.51	3.95	5.68	5.15	6.58	6.35
Interest on Loan	1.76	1.50	2.82	2.62	3.37	3.57
Interest on Working Capital	0.76	0.48	0.96	0.74	1.11	1.04
Less: Non-Tariff Income	0.00	0.00	0.00	0.00	0.00	0.00
SLDC Charges	23.16	15.82	30.31	24.05	35.00	33.36

3.4.8 LDC Development Fund

Regulation 98 of UERC Tariff Regulations, 2021 specifies as under:

“98. LDC Development Fund:

- (1) The SLDC shall create and maintain a separate fund called ‘Load Despatch Centre Development Fund’ (“LDCD Fund”).
- (2) All the other income of SLDC like short term open access charges, registration charges, scheduling and operating charges, etc. shall be deposited into LDCD Fund.

- (3) The SLDC shall be entitled to utilise the money available in the LDCD Fund for creation of new assets, meeting stipulated equity portion in asset creation, margin money for raising loan from the financial institutions and funding of R&D projects.
- (4) The LDCD Fund shall not be utilized for revenue expenditure except to meet the short fall, if any, in the annual charges allowed by the Commission or to meet the contingency expenses which were not foreseen at the time of making the application for fees and charges and are considered necessary for the efficient power system operation. However, such draws from the said fund shall be recouped from the expenditure allowed by the Commission under the respective heads at the time of truing up.
- (5) Any asset created by the SLDC out of the money deposited into the LDCD Fund shall not be entitled for return on equity, interest on loan and depreciation on same principles as in case of grant. SLDC shall submit details of such assets in the CAPEX plan.
- (6) SLDC shall submit the amount accumulated in LDC development fund along with the break-up of sources from where the fund is received. The Commission shall review the LDC development fund every year and issue directions to SLDC for effective utilization of the funds, if required."

The Petitioner submitted that the LDCD fund was created in FY 2016-17 and income from short-term open access charges, which includes NOC issuance charges and Registration fee is being deposited to the fund. The position of LDCD fund as submitted by the Petitioner is shown in the Table below:

Table 3.14 Position of LDCD Fund as submitted by SLDC (Rs. Crore)

S. No.	Particulars	FY 2019-20	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
a	Opening LDCD Fund		7.010	8.716	9.782	10.191	9.287
	Add:						
b	Additions in LDCD Fund during the year on account of:						
(i)	Short Term Open Access		1.760	0.656	0.689	0.723	0.759
(ii)	Registration Fees		0.003	0.41	0.431	0.452	0.475
c	Total LDCD Fund						
d	Less:						
(i)	Utilisation for Capital Expenses			0.00	0.71	2.08	1.43
(ii)	Utilisation for Revenue Expenses		0.0569	0.00	0.00	0.00	0.00
e	Net LDCD Fund as on 31st March of the Year		8.716	9.782	10.191	9.287	9.091

The LDCD fund approved by the Commission is as shown in the Table below:

Table 3.15: Position of LDCD Fund as considered by the Commission (Rs. Crore)

Particulars	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Opening LDCD Fund	8.72	9.78	10.19	9.29
Additions during the year	1.07	1.12	1.18	1.23
Total LDCD Fund	9.78	10.90	11.37	10.52
Less: Utilisation for capital expenditure	0.00	0.71	2.08	1.43
Closing LDCD Fund	9.78	10.19	9.29	9.09

The Petitioner is **directed to utilize the money out of LDCD fund only in creation of new assets in accordance with Regulation 98(3) and not meeting any revenue expenditure as was proposed by the Petitioner in its Business Plan for the fourth control period that it would carry out capacity building from funds available in LDCD fund. Further, the Commission directs the Petitioner to ensure timely submission of the completed cost along with the scheduled CoD, actual CoD and actual IDC incurred on the projects developed through LDC Development fund within 30 days of CoD of the project/works.**

3.4.9 Operating Charges

The Commission vide UERC (Terms and Conditions of Intra-State Open Access) Regulations, 2015 has specified the Operating Charges in respect of short-term open access customers. Regulation 21 of the UERC (Terms and Conditions of Intra-State Open Access) Regulations, 2015 specify the Operating Charges for the Short-term Open Access customer which is reproduced hereunder:

“21. SLDC and System Operation Charges:

SLDC and System Operation Charges shall be payable by Open Access customers at the following rates:-

(1) Transactions involving inter-State transmission system

...

(b) Short-term open access

Regional Load Despatch Centre and State load despatch centre system operation charges as specified by the Central Commission.

(2) Transactions not involving inter-State transmission system

...

(b) Short-term open access

System Operation charge per day or for part of the day shall be payable by a short-term open access customer for each transaction to SLDC as determined by the Commission from time to time.

[Explanation: System Operation charge includes fee for scheduling and system operation, energy accounting, fee for affecting revisions in schedule on bonafide grounds and collection and disbursement of charges.]

In compliance of the aforesaid Regulation 21(2)(b), the Commission has decided to retain the system operation charges of Rs. 3,000 per day or part of the day for each transaction payable to the SLDC by intra-state open access customers with effect from the date of issue of this Order.

The SLDC Charges approved for FY 2022-23 shall be applicable with effect from April 01, 2022 and shall continue to apply till further Orders of the Commission.

4 Commission's Directives

The Commission in its previous Orders had issued a number of specific directions to SLDC with an objective of attaining operational efficiency and streamlining the flow of information, which would be beneficial for the Sector and the Petitioner both in short and long term. This Chapter deals with the compliance status and Commission's views thereon as well as the summary of new directions for compliance and implementation by SLDC.

4.1 Compliance of Directives issued in APR Order for FY 2020-21 dated April 26, 2021

4.1.1 *Project Cost & Transfer of assets from PTCUL to SLDC*

The Commission once again directed SLDC that the provisions of the UERC Tariff Regulations, 2018 has to be complied strictly by SLDC regarding maintenance of its expenses related to operation of SLDC. The Commission also directs the SLDC to file the Petition seeking truing up of FY 2020-21 along with the APR of FY 2021-22 in accordance with the MYT Regulations, 2018.

Petitioner's Submissions

The process of ring fencing of SLDC is underway and several concrete steps have been taken by PTCUL in this direction. Since, the accounts of SLDC and SCADA are audited with accounts of PTCUL ipso-facto being part of PTCUL accounts, SLDC is unable to file a separate true up Petition for FY 2020-21. The Petitioner is filing the APR for FY 2021-22 and ARR Petition for Control Period of FY 2022-23 to FY 2024-25 based on monthly trial balance for SLDC and SCADA.

Fresh Directive

The Commission observed that the ring fencing of SLDC is still in process. **The Commission once again directs SLDC that the provisions of the UERC Tariff Regulations, 2021 has to be complied strictly by SLDC regarding maintenance of its expenses related to operation of SLDC. The Commission also directs the SLDC to file the Petition seeking truing up of FY 2021-22 along with the APR of FY 2022-23 in accordance with the MYT Regulations, 2018 failing which action may be initiated against it under the provisions of the Act. SLDC is also directed to submit quarterly status to the Commission regarding the efforts made for ring fencing of SLDC within 15 days from the end of each quarter.**

4.1.2 LDC Development Fund

The Petitioner is directed to ensure timely submission of the completed cost along with the scheduled COD, actual COD and actual IDC incurred on the projects developed through LDC Development fund within 30 days of CoD of the project/works.

Petitioner's Submissions

The information of projects completed through LDCD fund shall be submitted to the Commission in a timely manner.

Fresh Directive

The Petitioner is directed to ensure timely submission of the completed cost along with the scheduled COD, actual COD and actual IDC incurred on the projects developed through LDC Development fund within 30 days of CoD of the project/works.

4.1.3 Financing of infrastructural works

The Petitioner is directed to submit the details of the works financed through Internal Resources separately for FY 2020-21 within 3 months of issuance of this Order. The Petitioner is also directed to submit the same details for FY 2021-22 at the time of filing of Petition seeking truing up of FY 2020-21 along with the APR of FY 2021-22.

Petitioner's Submissions

The Petitioner submitted that directive shall be adhered by SLDC.

Fresh Directive

The Petitioner is directed to submit the details of the works financed through Internal Resources separately for FY 2021-22 within 3 months of issuance of this Order. The Petitioner is also directed to submit the same details for FY 2022-23 at the time of filing of Petition seeking truing up of FY 2021-22 along with the APR of FY 2022-23 in accordance with the MYT Regulations, 2021.

4.1.4 AMC Contracts

The Commission directs the Petitioner to submit the details of bids received along with the details of L-1, L-2, and L-3 bidders for annual maintenance along with the next ARR Petition for FY 2022-23.

Petitioner's Submissions

AMC for SCADA division during FY 2020-21 and FY 2021-22 is done only for proprietary work (like GE T&D, SCADA System Maintenance and PUNCOM, PLCC Maintenance) . The other AMC viz Air Conditioning Maintenance- approval has been taken from competent authority and e-tendering is in process at present and not executed in FY 2020-21 and 2021-22 due to Covid-19 pandemic. The detail of both bids will be furnished after award of contract.

Fresh Directive

The Commission directs the Petitioner to submit the details of bids received along with the details of L-1, L-2, and L-3 bidders for annual maintenance along with the next ARR Petition for FY 2023-24.

4.2 Fresh Directives

4.2.1 Timely execution and capitalization of schemes (Para 2.4.2)

The Commission strictly directs the Petitioner to expedite the process of executing the project and capitalise the schemes as approved in the current Order.

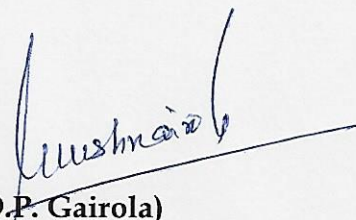
4.2.2 Utilisation of LDCD funds (Para 3.4.8)

The Petitioner is directed to utilize the money out of LDCD fund only in creation of new assets in accordance with Regulation 98(3) and not meeting any revenue expenditure as was proposed by the Petitioner in its Business Plan for the fourth control period that it would carry out capacity building from funds available in LDCD fund

The SLDC charges approved for FY 2019-20 will be applicable from April 01, 2022 till revised by the Commission.



(M.K. Jain)
Member (Technical)



(D.P. Gairola)
Member (Law)/ Chairman (I/c)

5 Annexures

5.1 Annexure-1: Public Notice on SLDC's Proposal for Multi Year Tariff from 2022-23 to 2024-25



POWER TRANSMISSION CORPORATION OF UTTARAKHAND LTD.
 (A Govt. of Uttarakhand Undertaking)
"Vidyut Bhawan" Near ISBT Crossing, Saharanpur Road, Majra, Dehradun - 248002
 Corporate ID U40101UR2004GOI028675, Phone no.: 0135-2642006 Fax no. 0135-2643460

PUBLIC NOTICE

inviting Comments on the petition filed by SLDC for Annual Performance Review for FY 2021-22 and Multi Year Tariff for FY 2022-23 to FY 2024-25

Salient features of MYT Petition

State Load Despatch Center (SLDC), which has been made operational for grid control and despatch of electricity and other related works w.e.f. November 27, 2012 in the State of Uttarakhand has filed a petition before the Commission for approval of Annual Performance Review for FY 2021-22 and Multi Year Tariff for FY 2022-23 to FY 2024-25. The summary of Proposals made by SLDC for the aforesaid is given in the following Table.

(figures in ₹ Crore)

S. No.	Particular	FY 2021-22		FY 2022-23	FY 2023-24	FY 2024-25
		Approved in Tariff Order dt. 26.04.2021	Revised Estimates	Proposed	Proposed	Proposed
1	O& M expenses	7.74	10.09	14.28	17.72	20.13
2	Interest on Loan	1.16	1.09	1.76	2.82	3.37
3	Return on Equity	1.55	1.76	1.86	3.12	3.81
4	Depreciation	3.50	3.68	4.51	5.68	6.58
5	Interest on Working Capital	0.51	0.64	0.76	0.96	1.11
6	Total ARR	14.46	17.27	23.16	30.31	35.00
7	Less: Non-tariff Income	0.00	0.00	0.00	0.00	0.00
8	Net ARR	14.46	17.27	23.16	30.31	35.00

2. SLDC has proposed a total increases of 60.17% for FY 2022-23 over the approved SLDC charges for FY 2021-22. In case, the entire claim for SLDC is accepted by the Commission, additional hike of 2.43% (AS UPCL has not separately projected ARR for FY 2022-23 for PTCUL and SLDC the tariff hike includes impact of PTCUL) in consumer tariff shall be required over and above the hike proposed by UPCL. The recovery of the charges from the beneficiaries has been proposed through suitable fees and charges.

3. Detailed proposal can be seen free of cost on any working day at the Commission's office or at the office of Managing Director, Power Transmission Corporation of Uttarakhand Limited. Vidyut Bhawan, Saharanpur Road, Majra, Near ISBT, Dehradun- 248001, Uttarakhand. Relevant extracts can also be obtained from the above mentioned offices of the Petitioner.

4. The Proposals are also available at the website of the Commission (www.uerc.gov.in) and at SLDC's website (www.ukslcdc.in).

5. Objections/suggestions are invited from the consumers and other stakeholders on the above proposal. These may be sent to the Secretary, Uttarakhand Electricity Regulatory Commission. either in person. or by post at Vidyut Niyamak Bhawan, Near I.S.B.T. P.O. - Majra Dehradun-248171 or Through e-mail to secy.uerc@gov.in as a statement of objections or comments with copies of the documents and evidence in support thereof so as to reach the secretary by 31.01.2022.

Letter No. 447/SLDC Date : 23.12.2021 Managing Director

5.2 Annexure-2: Public Notice on SLDC's Proposal for Business Plan from 2022-23 to 2024-25

**POWER TRANSMISSION CORPORATION OF UTTARAKHAND LTD.**
(A Govt. of Uttarakhand Undertaking)
"Vidyut Bhawan" Near ISBT Crossing, Saharanpur Road, Majra, Dehradun - 248002
Corporate ID U40101UR2004GOI028675, Phone no.: 0135-2642006 Fax no. 0135-2643460

PUBLIC NOTICE
inviting Comments on the Petition filed by SLDC for approval of the Business Plan for FY 2022-23 to FY 2024-25

1. State Load Despatch Center (SLDC), which has been made operational for grid control and despatch of electricity and other related works w.e.f. November 27, 2012 in the State of Uttarakhand has filed a petition before the Commission for approval of its Business Plan for FY 2022-23 to FY 2024-25 giving details of the activities proposed to be carried out by it during this Control Period.
2. Detailed proposal can be seen free of cost on any working day at the Commission's office or at the office of Managing Director, Power Transmission Corporation of Uttarakhand Limited, Dehradun. Vidyut Bhawan, Saharanpur Road, Majra, Near ISBT, Dehradun- 248001, Uttarakhand. Relevant extracts can also be obtained from the above mentioned offices of the Petitioner.
3. The Proposals are also available at the website of the Commission (www.uerc.gov.in) and at SLDC's website (www.ukslcdc.in).
4. Objections/suggestions are invited from the consumers and other stakeholders on the above proposals. These may be sent to the Secretary, Uttarakhand Electricity Regulatory Commission. either in person, or by post at Vidyut Niyamak Bhawan, Near I.S.B.T. P.O. - Majra Dehradun-248171 or Through e-mail to secy.uerc@gov.in as a statement of objections or comments with copies of the documents and evidence in support thereof so as to reach the secretary by 31.01.2022.

Letter No. 446/SLDC Date:23.12.2021**Managing Director**

"Save Electricity in the Interest of Nation"

5.3 Annexure-3: List of Participants in Public Hearing

List of Participants in Hearing at Ranikhet on 26.02.2022

Sl. No.	Name	Designation	Organization	Address
1.	Sh. Amar Singh Areeda	-	-	Sadar Bazar, Vaani Photostat Shop, Ranikhet, Uttarakhand
2.	Sh. Harish Kumar	-	-	Hotel Ranikhet Grant, Ranikhet, Uttarakhand
3.	Sh. Rakesh Verma	-	-	Office of SDE (Rural), Bharat Sanchar Nigam Ltd. (BSNL), Almora, Uttarakhand
4.	Sh. Manish Chaudhary	-	-	511, Sadar Bazar, Ranikhet, Uttarakhand
5.	Sh. Mohan Negi	-	-	Subhash Chowk, Ranikhet, Uttarakhand
6.	Sh. Nikhil Kumar	-	-	Bhatt Photostat Shop, Gandhi Chowk, Ranikhet, Uttarakhand
7.	Sh. Rohit Sharma	-	-	Village-Badhan Chilianaula, Ranikhet, Uttarakhand
8.	Sh. Ajay Kumar Bablu	-	-	825, Gandhi Chowk, Ranikhet, Uttarakhand

List of Participants in Hearing at Rudrapur on 27.02.2022

Sl. No.	Name	Designation	Organization	Address
1.	Sh. Balkar Singh Fauzi	-	-	Village-Raipur Khurd, P.O.-Kashipur, Distt. Udham Singh Nagar
2.	Sh. Rajiv Bhatnagar	-	-	D-1/4, Flat No. 61, Metropolis City, IIE, SIDCUL, Pantnagar, Rudrapur, Distt. Udham Singh Nagar
3.	Sh. Kalyan Singh	-	-	Village-Ghardei, P.O.-Mahuakhera, Kashipur, Distt. Udham Singh Nagar
4.	Sh. Arunesh Kumar Singh	-	-	Phalsunga, P.O.-Transit Camp, Rudrapur, Distt. Udham Singh Nagar
5.	Sh. Vikas Jindal	President	M/s Kumaon Garhwal Chamber of Commerce & Industry Uttarakhand	Chamber House, Industrial Estate, Bazpur Road, Kashipur, Distt. Udham Singh Nagar
6.	Sh. Shakeel A. Siddiqui	Legal Consultant	M/s Galwalia Ispat Udyog Pvt. Ltd.	Narain Nagar Industrial Estate, Bazpur Road, Kashipur-244713, Distt. Udham Singh Nagar
7.	Sh. R.K. Singh	Head (CPED and	M/s Tata Motors Ltd.	Plot No.-1, Sector-11, Integrated Industrial Estate, SIDCUL,

List of Participants in Hearing at Rudrapur on 27.02.2022

Sl. No.	Name	Designation	Organization	Address
		Construction & E)		Pantnagar-263153, Distt. Udham Singh Nagar.
8.	Sh. Ashok Bansal	Managing Director	M/s Rudrapur Solvents Pvt. Ltd.	7 th KM Stone, Rudrapur-Kichha Road, V.P.O. Lalpur-263148, Distt. Udham Singh Nagar
9.	Sh. Deepak Saini	-	M/s SRF Ltd.	Plot No. 12, Ramnagar Road, Kashipur, Distt. Udham Singh Nagar
10.	Sh. Jagdeesh Singh	-	-	Village-Dharampur, P.O. Chattarpur, Distt. Udham Singh Nagar
11.	Sh. Keshav Sharma	-	-	Village-Fauzi Matkota, Rudrapur, Distt. Udham Singh Nagar
12.	Sh. Prabhu Singh	-	-	Verma Line, Ward No. 3, Tanakpur, Champawat
13.	Sh. Umesh Sharma	Chairman (Power Cell)	SIDCUL Entrepreneur Welfare Society	Plot No. 1, Sector-9, IIE, SIDCUL, Pantnagar Industrial Area, Rudrapur, Distt. Udham Singh Nagar-263153
14.	Sh. Deepak Kumar	-	M/s Nestle India Ltd.	Plot No. 1A, Sector-1, Pantnagar, SIDCUL Industrial Area Road, Distt. Udham Singh Nagar-263153
15.	Sh. Sukha Singh Virk	-	-	Village & P.O. Chattarpur, Rudrapur, Distt. Udham Singh Nagar
16.	Sh. Sanjeev Kumar	Sr. General Manager (HR)	M/s Surya Roshni Ltd.	7th KM Stone, Moradabad Road, Kashipur, Distt. Udham Singh Nagar
17.	Sh. Praveen Singh	-	M/s Sanjay Technoplast Pvt. Ltd.	Pant Nagar Plant, Khata No. 182, Khasra No. 301 Min., Village-Fulsunga, Tehsil-Kichha, Rudrapur-263153, Distt. Udham Singh Nagar
18.	Sh. Ram Kumar Agarwal	-	M/s Umashakti Steels Pvt. Ltd.	Village-Vikrampur, Post Off.-Bazpur-262401, Distt. Udham Singh Nagar
19.	Sh. Sanjay Kumar Adhlakha	Director	M/s Ambashakti Glass India Pvt. Ltd.	Plot No. 41, Sector 3, IIE, Pantnagar, Rudrapur-263153, Distt. Udham Singh Nagar
20.	Sh. Teeka Singh Saini	Block President	Bhartiya Kisan Union	Office-33, Katoratal, Kashipur, Distt. Udham Singh Nagar
21.	Sh. Sheetal Singh	-	-	Village-Jagatpur Patti, Kashipur, Distt. Udham Singh Nagar
22.	Sh. Dakshin Singh Deol	-	-	Village-Bharatpur, Kashipur, Distt. Udham Singh Nagar

List of Participants in Hearing at Rudrapur on 27.02.2022

Sl. No.	Name	Designation	Organization	Address
23.	Sh. Jaagir Singh	-	-	Village-Bharatpur, Kashipur, Distt. Udham Singh Nagar
24.	Sh. Rajeev Gupta	-	M/s Kashi Vishwanath Steels Pvt. Ltd.	Narain Nagar Industrial Estate, Bazpur Road, Kashipur-244713, Distt. Udham Singh Nagar
25.	Sh. Prem Narayan Singh	General Manager	M/s Shree Ambuja Castings (P) Ltd.	Village-Vikrampur, Industrial Estate, Ramraj Road, Bazpur-262401, Distt. Udham Singh Nagar
26.	Sh. Rajeev Jindal	Director	M/s Uttaranchal Ispat (P) Ltd.	Plot No. D-1 to D-8, Pipalia Industrial Area, Gram-Jagannathpur, Bazpur, Distt. Udham Singh Nagar
27.	Sh. Chandresh Agarwal	Dy. General Manager (Electricals)	M/s India Glycols Ltd.	A-1, Industrial Area, Bazpur Road, Kashipur-244713, Distt. Udham Singh Nagar.

List of Participants in Hearing at Dehradun on 02.03.2022

Sl. No.	Name	Designation	Organization	Address
1.	Sh. B.P. Maithani	President	RTI Club	"Roopsadan", 58-Salangaon, Bhagwantpur, Dehradun-248009
2.	Sh. Yagya Bhushan Sharma	Secretary	RTI Club (Uttarakhand)	827/1, Sirmour Marg, Kaulagarh Road, Dehradun
3.	Sh. S.K. Singh	-	-	Dashmesh Vihar, Raipur Road, Dehradun
4.	Sh. Kawaljeet Singh	-	-	Dashmesh Vihar, Raipur Road, Dehradun
5.	Sh. Vijay Singh Verma	-	-	Village-Delna, P.O. Jhabrera, Roorkee-247665, Haridwar
6.	Sh. Shailendra Semwal	-	-	Mohkampur, Dehradun
7.	Sh. Veeru Bisht	-	-	Mohanpur, Post Off.-Premnagar, Dehradun-248007
8.	Sh. Vishwa Mitra	-	-	36, Panchsheel Park, Chakrata Road, Dehradun-248006
9.	Sh. D.S. Rawat	-	-	Village-Odda, P.O.-Khandusain, Pauri Garhwal-246001
10.	Sh. Rajendra Chaudhary	General Secretary	Uttarakhand PCC	423/35, Civil Lines, Roorkee, Haridwar
11.	Sh. V.S. Bhatnagar	-	-	98/3, Near Hilton School, Bell Road, Clement Town, Dehradun
12.	Sh. Sunil Kumar Gupta	Editor	Teesri Aankh ka Tehalka	16, Chakrata Road (Tiptop Gali), Dehradun-248001
13.	Sh. Kavindra Singh Bisht	-	-	1148, Indira Nagar Colony, Seemadwar, Dehradun
14.	Sh. K.S. Pundir	-	-	House No. 2, Shantikunj, Lane

List of Participants in Hearing at Dehradun on 02.03.2022

Sl. No.	Name	Designation	Organization	Address
				No. 1-A, Lower Nathanpur, Dehradun
15.	Sh. S.P. Nautiyal	-	-	Lower Nehrugram, Dehradun
16.	Sh. S.K. Agrawal	Advocate	-	Chamber No. 40, South Block, Civil Court Compound, Dehradun
17.	Sh. Manvendra Singh	-	-	Sewla Khurd, Dehradun
18.	Sh. Surya Prakash	-	-	271/153, Dharampur, Araghar, One-way Haridwar Road, Dehradun
19.	Sh. Brijendra Mohan Joshi	-	-	46-C, Pathribagh, Dehradun
20.	Sh. Satya Prakash Chauhan	-	-	Bhagirathipuram, Tea Estate, Banjarawala, Dehradun
21.	Sh. Kishor Singh Rawat			Jwalpa Enclave, Near Jwalpa Mandir, Mohkampur, Dehradun
22.	Sh. Pankaj Gupta	President	M/s Industries Association of Uttarakhand	C/o Satya Industries, Mohabbewala Industrial Area, Dehradun
23.	Sh. Rajiv Agarwal	Sr. Vice-President	M/s Industries Association of Uttarakhand	C/o Satya Industries, Mohabbewala Industrial Area, Dehradun-248 110
24.	Sh. Sanjeev Kumar Sharma	Office Executive	M/s Industries Association of Uttarakhand	C/o Satya Industries, Mohabbewala Industrial Area, Dehradun
25.	Sh. Kamaldeep Kamboj	-	-	G-3, Janpath Shopping Complex, Chakrata Road, Dehradun
26.	Sh. Gulshan Khanduri	-	M/s Ganesh Roller Flour Mills	Mohabewala Industrial Area, Subhash Nagar, Dehradun
27.	Sh. Vishal Bhardwaj	-	-	Buggawala, Haridwar
28.	Sh. Manmohan Bhardwaj	-	-	Buggawala, Haridwar
29.	Sh. Naveen Patwal	-	-	Khasra no. 504&506, Village-Sadhauli, P.O.-Jhabrera, Roorkee-247665, Haridwar
30.	Sh. Manish Gera	-	-	Village-Jalalpur Dada, Tehsil-Bhagwanpur, Haridwar
31.	Sh. Prashant Bhardwaj	-	-	Sai Lok, GMS Road, Dehradun
32.	Sh. Anurag Sharma	-	-	Buggawala, Haridwar
33.	Sh. Arvind Sharma			Buggawala, Haridwar
34.	Sh. Hiresha Verma	-	-	13, Prakash Lok, Phase-2, Shimla Bypass Road, Dehradun
35.	Ms. Sunita Chaudhary	-	-	Village-Kheda Jat, Post Off.-Gurukul Narsan, Distt. Haridwar
36.	Sh. Dinesh Kumar Walia	-	-	Jageetpur, Near Chatriwala Kua, P.O.-Kankhal, Haridwar
37.	Sh. Dhruv Agrawal	-	-	8, Kalidas Road, Hathibarkala, Dehradun-248001

List of Participants in Hearing at Kotdwar on 08.03.2022

Sl. No.	Name	Designation	Organization	Address
1.	Sh. Daulat Singh Rawat	-	-	Village-Maganpur, P.O.-Kishanpur, Kotdwar, Distt. Pauri Garhwal
2.	Sh. Kunwar Singh Rawat	-	-	Village-Maganpur, P.O.-Kishanpur, Kotdwar, Distt. Pauri Garhwal
3.	Sh. Mahendra Singh Negi	-	M/s Pushkar Steel Pvt. Ltd.	Padampur, Sukhro, Near Sunil Tent House, Lalpur Road, Kotdwar (Garhwal), Distt. Pauri Garhwal
4.	Sh. Subhash Chand	-	M/s Pushkar Steel Pvt. Ltd.	Jasodarpur, Kotdwar, Distt. Pauri Garhwal
5.	Sh. Arun Bahuguna	-	M/s Kotdwar Steel Pvt. Ltd.	Block-E, Jasodarpur Industrial Area, Maganpur, Kotdwar, Distt. Pauri Garhwal
6.	Sh. Sunil Singh Rawat	-	-	SLB-103, Aashiyana Housing Society, Near Motor Nagar, Behind Khushi Hotel, BAV Road, Sitabpur, Kotdwar-246149, Distt. Pauri Garhwal
7.	Sh. Devendra Pal Singh	-	-	Near Balaji Mandir, Lower Kalabarh, Kotdwar, Distt. Pauri Garhwal
8.	Sh. Jagdish Prasad Bhardwaj	-	-	Lalpul, Beladaat, P.O.-Padampur, Kotdwar, Distt. Pauri Garhwal
9.	Sh. J.S. Rana	-	-	Gusain Purum Colony, Sitabpur, Devi Road, P.O.-Kotdwar, Distt. Pauri Garhwal
10.	Sh. Pawan Agarwal	Vice-President	M/s Uttarakhand Steel Manufacturers Association	C/o Shree Sidhbali Industries Ltd., Kandi Road, Kotdwar, Uttarakhand
11.	Sh. Ripudaman Bisht	General Secretary	वरिष्ठ नागरिक संगठन	Office-Major Balam Singh Chandrawati Negi Sainik Kalyan Trust, Near Khushi Hotel, Devi Road, Kotdwar-246149, Distt. Pauri Garhwal
12.	Sh. Kulbeer Singh Rawat	-	-	Village-Balasaur, Near Saraswati Vidya Mandir, Jankinagar-246149, Kotdwar, Distt. Pauri Garhwal
13.	Sh. A.K. Badola	-	-	House No.-17, Govind Nagar, Kotdwar-246149, Distt. Pauri Garhwal

List of Participants in Hearing at Kotdwar on 08.03.2022

Sl. No.	Name	Designation	Organization	Address
14.	Sh. Atul Bhatt	-	Nagrik Manch	Malviya Udhyan, Kotdwar, Distt. Pauri Garhwal
15.	Sh. Chandresh Kumar Lakhera	-	-	Village-Lalpani, P.O.-Kumbhichaur, Ward No.-3, Kotdwar, Distt. Pauri Garhwal
16.	Sh. Indra Mohan Singh	-	-	Lower Kalabarh, Near Balaji Mandir, Kotdwar, Distt. Pauri Garhwal
17.	Sh. Rajesh Kumar	-	M/s Bhagya Shree Steel & Alloys Pvt. Ltd.	Jasodarpur, Kotdwar, Distt. Pauri Garhwal
18.	Sh. Balveer Singh Rawat	-	-	Village-Balasaur, Kotdwar, Distt. Pauri Garhwal
19.	Dr. Chandra Mohan Kharkwal	-	-	Sitabpur, Kotdwar, Distt. Pauri Garhwal
20.	Sh. Chandra Mohan Singh Negi	-	-	Shiv Nagar, Devi Road, Kotdwar, Distt. Pauri Garhwal
21.	Sh. Brijpal Singh Negi	-	-	Manpur, Kotdwar, Distt. Pauri Garhwal
22.	Sh. Anil Singh Negi	-	-	Near MKVN International School, Shibbu Nagar, Kotdwar, Distt. Pauri Garhwal
23.	Sh. Mujib Naithani	-	-	Lansdowne Bhawan, Near Devi Mandir, Sitabpur, Kotdwar, Distt. Pauri Garhwal
24.	Sh. Sandeep Joshi	-	-	Village-Sitabpur, Kotdwar, Distt. Pauri Garhwal
25.	Sh. Abhay Kala	-	-	Village-Kashirampur, Near Maheshwari Petrol Pump, Najibabad Road, Kotdwar-246149, Distt. Pauri Garhwal
26.	Sh. Digmohan Negi	-	-	Village-Chamolsain, P.O.-Banghat, Satpuli-246172, Distt. Pauri Garhwal
27.	Sh. Manorath Nirala	-	-	C/o Sh. Kailash Bisht, Near Patwal Chakki, Circuit House Road, Distt. Pauri Garhwal-246001
28.	Sh. D. S. Rawat	-	-	Village-Odda, P.O.-Khandyusain, Block-Koti, Distt. Pauri Garhwal-246001
29.	Sh. Rajendra Jajedi	-	-	Ward No. 3, Lalpani, Kotdwar, Distt. Pauri Garhwal
30.	Sh. Mahendra Pal Singh Rawat	-	-	Village-Ratanpur, P.O.-Kumbhichaur, Ward No.-1, Kotdwar, Distt. Pauri Garhwal
31.	Sh. Chandra Mohan Singh Rawat	-	-	Village-Jeetpur, P.O.-Kumbhichaur, Kotdwar, Distt.

List of Participants in Hearing at Kotdwar on 08.03.2022

Sl. No.	Name	Designation	Organization	Address
				Pauri Garhwal
32.	Sh. Rohit Dandriyal	-	-	399, Shayama Vihar Colony, Padampur, Sukhron, Kotdwar, Distt. Pauri Garhwal
33.	Sh. Harendra Singh Negi	-	-	Near Panchayat Ghar, Shibu Nagar, Kotdwar, Distt. Pauri Garhwal
34.	Sh. Umed Rawat	-	-	Badrinath Road, Near GGIC, Padampur, Sukhron, Kotdwar- 246149, Distt. Pauri Garhwal
35.	Sh. Ashish Kimothi	-	-	Kalabarh, Kotdwar, Distt. Pauri Garhwal