

Objection No. 01



Amritsar "ਸਰਬਤ ਦਾ ਭਲਾ" FOCAL POINT INDUSTRIES ASSOCIATION (REGD.50)

(SERVING SINCE 1985)

35, FOCAL POINT, MEHTA ROAD, AMRITSAR-143 006

E-mail : fpia.asr1985@gmail.com

CHAIRMAN

KAMAL DALMIA
(M) 98769-99666
RAVINDER SINGH
(M) 99150-48003

PRESIDENT

DARSHAN S. GORAYA
(M) 98140-55351

SR.VICE PRESIDENT

RAJEEV KAPOOR
(M) 94172-28258
RAMAN TREHAN
(M) 98156-29999

GEN.SECRETARY

AVINASH SHARMA
(M) 99152-56260
PUNEET ISSAR
(M) 98141-12303

PATRON-IN-CHIEF

R.S MARWAHA
(M) 98147-40686
DAVINDER PAL SINGH
(M) 98726-10809

VICE PRESIDENT

AJAY PODDAR
(M) 98143-77595
HARMEET SINGH
(M) 98140-51168
I. S. SADANA
(M) 77400-30288
KAMAL BAGGA
(M) 80544-03386
KANAV AGGARWAL
(M) 99881-45678
SHARANJIT SINGH
(M) 98140-50146
SUKHDEV SINGH
(M) 97818-24500

ADVISORS

ABHIJIT SINGH
(M) 98767-77221
AJMER SINGH
(M) 98787-81535
AMRIK BHULLAR
(M) 98140-50918
BALDEV SINGH
(M) 94172-44163
HARJIT SINGH
(M) 98155-02858
HARVINDER SINGH
(M) 98140-51704
H.S. SANDHU
(M) 98147-24180
JAGMOHAN SINGH
(M) 98140-50238
KAWALJEET SINGH
(M) 98766-16820
PARAMJIT SINGH
(M) 98761-79525
PAWAN KUMAR
(M) 93561-07475
RAJNEESH HANDA
(M) 98150-88301
RAMESH SEHDEV
(M) 98140-50801
RAMINDER S. WALIA
(M) 92169-92902
RAVI DHAWAN
(M) 98140-55064
SUKHDEV SINGH
(M) 98770-03094
TEJINDER SINGH
(M) 98140-52529

FPIA/896

Punjab State Electricity Regulatory Commission,
Chandigarh

Kind Attn.: Hon'ble Shri Viswajeet Khanna , Chairperson
Sub: Suggestions for Improvement in Working of PSTCL & PSPCL

Respected Sir,

We are giving hereunder the suggestions for the improvement in the working of PSTCL & PSPCL for your consideration:

1. That charges demanded as a result of checking / arrears due to under assessment are included in regular supply bill by the Punjab State Power Corporation Limited (PSPCL). If these charges / arrears are not paid, penalty is levied and recovered from the consumer.

As per supply code clause 30.1.2, the bill cum notice for arrears shall be initially tendered separately and shall not be clubbed with current electricity bill. If arrears are not cleared by the consumer, such arrears shall be indicated regularly in the subsequent electricity bills. In case arrear bill is included in the current energy bill at the first instance, the distribution licensee shall not be entitled to take any punitive action against the consumer for non payment of such arrears amount along with the current energy bill.

It is suggested that this clause should be strictly implemented and action should be taken against erring officer.

28th January, 2022

2. That PSTCL & PSPCL every year file petition before the commission to increase electricity tariff. Increasing tariff is not a permanent solution to the problem. Electricity Tariff in Punjab is already very much higher as compared to the adjoining states i.e. HP, Jammu & Kashmir etc. etc. It is suggested that PSTCL & PSPCL should reduce its Transmission losses, Breakdown expenses, improve working by blocking loop holes etc. etc. To take care of these, Corporation should appoint Advisors & auditors of international / national repute without any delay. Where there is will, there is always a way.
3. That earlier, interest payable to consumer on ACD was SBI rate of interest plus 2% whereas it has been revised to RBI rate of interest. Minimum Interest rate applicable to Industry on banks borrowings is 8%. Accordingly, Rate of interest on ACD should be made at par with the lending rate of interest charged by the commercial banks.
4. That earlier it was the auditors who used to direct the local PSPCL officials to issue notices for collecting the difference in ACD from consumers which becomes payable due to increase in their consumption bill every year. Auditor / MMTS direct the local officials to collect the difference in ACD amount within 10 to 15 days from the date of Notice whereas ACD demanded with Bar Code Demand Notice have payment time of 3 months. It is suggested that only Assessing officer should deal with the ACD related matters and no other authority, whether Audit or MMTS should interfere in the same. Rate of ACD should also be reduced and it should be made equal to one month average consumption bill instead of 1 ½ times of the average monthly bill of previous year. It is also desired that a uniform formula for assessing ACD should be made public so that consumer can check the same easily before making payment.

Further, there is also a provision for refund of ACD, in case, it is excess, but local officials don't refund the same to consumer. The said provision should also be made effective. Dealings should be made very crystal clear & fair.

5. That Presently, Hotels / Malls etc. are charged consumption rate considering them as commercial entity. It is suggested that these establishments should be covered under Tourism Industry and Tariff applicable to that Industry should be charged. Amritsar is developing very fast as a Tourist hub. Tourists from all over the world are coming to Amritsar to visit the Golden Temple, Durgiana Temple, Jallianwallah Bagh, Retreat Ceremony at Indo – Pak Border and other newly developed heritage sites around the city. With this change, the New Hotels & Malls will come up to meet the demand of the visiting Foreign/ Indian Tourists.
6. That Ministry of Small Scale Industries has changed the criteria for classification of MSME with effect from 1st July,2020 as detailed below:

Previous MSME Classification			
Criteria : Investment in Plant & Machinery or Equipment			
Classification	Micro	Small	Medium
Mfg. Enterprises	Investment < Rs. 25 lac	Investment < Rs. 5 cr.	Investment < Rs. 10 cr.
Services Enterprise	Investment < Rs. 10 lac	Investment < Rs. 2 cr.	Investment < Rs. 5 cr.

Revised Previous MSME Classification from 01.07.2020			
Composite Criteria : Investment And Annual Turnover			
Classification	Micro	Small	Medium
Manufacturing & Services	Investment < Rs. 1 cr. And Turnover < Rs. 5 cr.	Investment < Rs. 10 cr. And Turnover < Rs. 50 cr.	Investment < Rs. 20 cr. And Turnover < Rs. 100 cr.

Inspite of this change by the Ministry, the Power Sector has not amended the criteria of classification of MSME enterprises till date. The Limits for MS Connection - 20KW to 100KW has not changed for the last 30 years. It is suggested that the limit of the same be increased to 500 KW.

7. That Presently PSPCL is having monopoly for distribution & transmission of electricity. To make it competitive and efficient, at least one more distribution / transmission Company should be allowed to operate in power sector.
8. That PSPCL & PEDDA are promoting use of Solar Power by installing Solar System. The two way Meters are neither available with PSPCL nor in the open market. Due to this, there is huge delay in installing the Solar System. It is suggested that Two Way Meters should be made available in open market as well as with PSPCL to avoid any delay in installing Solar System.
9. That PSPCL is still charging KVH Tariff / Peak Load Surcharge from its consumers for use of electricity from 6 PM to 10 PM during the months of June to September, inspite of Punjab being a power surplus state. Hence, it is requested that this surcharge should be withdrawn immediately.
10. That inspite of manifold increase in demand of Power in the Old Focal Point, Amritsar, there is still no sub-station in the area and Power Supply is being made from the Mall Mandi sub-station. It is requested that 132 KVA substation be installed at the Old Focal Point for which one plot has been kept reserved for the last 30 years by PSIEC.
11. That, Sometimes unscheduled power cuts are imposed by the PSPCL which disturb the working of the industrial units. It is suggested that the concerned official(s) responsible for imposing unscheduled power cut be made answerable / accountable for the same.
12. That whenever any new connection above 500KVA / KW is applied, feasibility clearance is mandatory before the commencement / registration of application. But in some cases, it is noticed that feasibility clearance is given only after approval from Chief Electricity Inspector and / or after installation of Energy Meter etc. which is not possible before the completion of the project. It is suggested that feasibility clearance should be given before the start of the project.

13. That the working of the Dispute Settlement Committee (DSC) should be made more disciplined and time bound. The cases are lying pending with the DSC even for almost last 3 years. It is suggested that the Consumer Redressal Forum (CRF) should monitor the working of DSC more effectively and it should be asked to submit monthly report of cases settled / pending for settlement to the Consumer Redressal Forum.

14. That the PSPCL should be directed to come up with an "One time settlement Scheme" so that consumers can regularize their Power Connections to avoid litigations.

15. That purchase of power in Punjab from National Grid is very costly as compared to the other state because of huge charges levied by PSPCL. It is suggested that PSPCL should reduce these charges & allow all LS Units above 500 KW load to purchase power from the National Grid (if desired) so that industry of Punjab can compete with the industry of adjoining states.

Hoping for your suitable needful action on the issues stated above.

Thanking you,

Yours faithfully,

For FOCAL POINT INDUSTRIES ASSOCIATION (REGD.)

(KAMAL DALMIA)
Chairman
M: 9876999666

(D. S GORAYA)
President
M: 9814055351

CC:

1. Hon'ble Shri Baldev Singh Sran,
Chairman cum Managing Director,
Punjab State Power Corporation Limited,
Patiala
2. Hon'ble Shri Tejveer Singh IAS,
Principal Secretary,
Industry & Commerce, Punjab,
Chandigarh

3. **Hon'ble Shri Anirudh Tiwari I.A.S.**
Chief Secretary Punjab,
Chandigarh
4. **Hon'ble Shri Navjot Singh Sidhu,**
MLA – Amritsar East & President Congress, Punjab,
Amritsar
5. **Hon'ble Shri Gurkirat Singh Kotli,**
Industries & Commerce Minister Punjab,
Chandigarh
6. **Hon'ble Shri O.P. Soni,**
Deputy Chief Minister Punjab
Chandigarh
7. **Hon'ble Shri Sukhjinder Singh Randhawa,**
Deputy Chief Minister,
Chandigarh
8. **Hon'ble Shri Charanjit Singh Channi,**
Chief Minister Punjab,
Chandigarh

(For kind information & with a request to please look into the issues discussed above for the welfare of Trade & Industry of Punjab).

PSTCL.

objection No.2

MANDI GOBINDGARH INDUCTION FURNACE ASSOCIATION (REGD.)

GRAIN MARKET, MANDI GOBINDGARH-147301 (PUNJAB)

Ph. : (0) 01765-654165, 252165 • E-mail : inductionfurnaceassociation@gmail.com

Mohinder Gupta
President
M. : 98140-48857

Vijay Bansal
Sr. Vice President
M. : 98140-15500

Ashish Singla
Vice President
M. : 98760-00919

Anil Jindal
Secretary
M. : 98150-85413

Regd.

Dated 14/02/2022

The Secretary,
Punjab State Electricity Regulatory Commission,
Plot No 3, Sector 18-A, Madhya Marg, Chandigarh-160 018.
<secretarypsercchd@gmail.com>

Subject: Petition for True Up of 2020-21, Annual Performance Review for the year 2021-22 and Revised Requirement of ARR for the year 2022-27 filed by Punjab State Transmission Corporation Limited (PSTCL).

Sir,

Punjab State Electricity Regulatory Commission (PSERC) has invited objections/ comments from the Industry and other categories of consumers on the ARR for 2022-23 submitted by PSTCL.

At the outset, we submit that there is some delay in submission of comments due to Corona which affected our workmen also. We request to condone the delay.

We, M/s MandiGobingarh Induction Furnace Association submit comments on the subject cited Petition submitted by PSTCL as under:-

1. PSTCL was constituted in 4/2010 as successor company to the then PSEB to look after transmission assets and since then Transmission losses for PSTCL system were being assumed as 2.5% on notional basis as boundary metering scheme was under implementation. In the ARR 2017-18 for MYT period of 2017-18 to 2019-20, PSTCL stated that the Transmission Losses during the period July 16 to March 16 varied between 2.76 to 7.09.

Keeping in view the large scale variations and data being yet to be firmed up, Hon'ble Commission ordered as under:-

2017-18 to 2019-20

As such, the Commission approves the Transmission losses at 2.5%, 2.40% and 2.30% for FY 2017-18, FY 2018-19 and FY 2019-20 respectively. The Commission would revisit the Transmission losses during review/true up for FY

2017-18, FY 2018-19 and FY 2019-20, on the basis of stabilized transmission loss data for full year.

In the ARR for 2018-19, PSTCL submitted the Transmission Loss of 2.80% for 2017-18 and 2.60% for 2018-19 for approval. In the Tariff Order for 2018-19, Commission decided as under:-

2017-18 (RE) 2018-19 (Proj)

The Commission observes that although PSTCL has completed Intra-State Boundary metering cum Transmission Level Energy Scheme, the data is yet to be stabilized. The Commission observes that it is allowing the Capital Investment Plan as projected /asked for by PSTCL since last many years and in Petition No. 44 of 2016 for approval of Capital Investment Plan of PSTCL for MYT Control Period has allowed ₹338.29 crore and ₹258.01 crore for FY 2017-18 and FY 2018-19 respectively, which is almost as per the projections made by PSTCL. Thus, there is no reason to deviate from its earlier targets for transmission loss. As such, the Commission provisionally retains the transmission loss level at 2.50% for FY 2017-18 and 2.40% for FY 2018-19, as approved in the Tariff Order for FY 2017-18.

In the ARR for 2019-20, Transmission loss of 3.12% (actual), 2.80% (RE) and 2.70% (Proj) for 2017-18, 2018-19 and 2019-20 respectively were submitted for approval of PSERC. Hon'ble Commission after analysing the data decided as under:-

True Up 2017-18

Therefore, the Commission is of the view that the actual transmission loss could not be assessed in the absence of truly stabilised data. As such, the Commission retains the transmission loss at 2.50% as approved in Tariff order for FY 2017-18.

RE 2018-19 and Projections 2019-20

As the baseline figure of transmission loss of PSTCL is yet to be ascertained, the Commission is of the view that it would not be fair to fix the trajectory for reduction of transmission loss. As such, the Commission approves the transmission loss level of 2.50% for FY 2018-19 and for FY 2019-20 and it would re-visit the transmission losses on the basis of stabilized transmission loss data for the full year during true up for these years.

Continuing with its earlier approach and in its ARR for the last year i.e. 2018-19 (True up), 2019-20 (RE) and Projections for MYT Control Period FY2021 to 2023 submitted Transmission Loss as 2.86% as per Actuals for 2018-19 and 3% for 2019-20 to 2022-23 for approval. Hon'ble Commission decided in TO 2020-21 as under:-

True up of 2018-19

"...PSTCL has changed the methodology of calculating the transmission losses from net input/output of energy to gross input/output of energy after the first quarter of FY 2018-19. Therefore the above losses in different months are based on different methodologies. As the true picture of losses for the whole year is not yet available, the Commission decides to consider the transmission loss level of 2.50% for true-up of FY 2018-19, as approved in the Tariff Order for FY 2019-20."

RE for 2019-20

The Commission observes that the actual Transmission loss reported by PSTCL till December of FY 2019-20 is coming to 2.22%. Since losses in the lean months (Jan-March) are observed to be comparatively higher, the Commission decides to provisionally retain the transmission loss level at 2.50% as approved in the Tariff Order of FY 2019-20. The transmission losses for FY 2019-20 shall be revisited based on the data of actual losses for the full year during the True Up of the year.

Projections for MYT period FY 2020-21, 2021-22 and 2022-23

In the Business Plan Order including the Capital Investment Plan dated 03rd December 2019, the Commission has approved the Transmission loss trajectory of reduction of 0.02% every year for 2nd MYT Control Period. The Commission stated that the Transmission losses for the Control Period shall be specified accordingly on the basis the actual losses for FY 2019-20.

The actual losses of FY 2019-20 were not available and accordingly, based on the transmission loss level of 2.50% approved for FY 2019-20 in this Tariff Order, the Commission decided to provisionally set the trajectory in Table 83 for 2nd MYT period as 2.48%, 2.46% and 2.44% for FY 2020-21, 2021-22 and 2022-23 respectively.

In the ARR for 2021-22, PSTCL submitted the actual Transmission Loss as 2.217% for 2019-20 and 2.143% for first 6 months of 2020-21. However, in spite of actuals being available PSTCL still proposed to retain the trajectory levels of 2.48% and 2.46% for 2020-21 and 2021-22 respectively. Hon'ble Commission decided in the Tariff order as under:-

True up for 2019-20

3.3.5 The Commission has observed that PSTCL has revised the methodology of calculating the percentage of transmission losses from gross input/output of energy to net input/output of energy. The absolute value of transmission loss is 1385 MkwH though the percentage has gone to 2.69%.

3.3.6 For true up of FY 2019-20, the Commission approves transmission loss of 1385 MWh and 2.69% of transmission loss.

RE for 2020-21 and Projections for 2020-21 and 2021-22

4.3.7 The Commission observes that the actual Transmission loss reported by PSTCL till December of FY 2020-21 amounts to 2.47%. Since losses in the lean months (Jan-March) are observed to be comparatively higher, the Commission decides to provisionally retain the transmission loss level at 2.48% and 2.46% for FY 2020-21 and FY 2021-22 respectively as approved in the Tariff Order of FY 2020-21. The transmission losses for FY 2020-21 shall be revisited based on the data of actual losses for the full year during the True Up of the year.

Now in the current ARR, PSTCL has worked out actual transmission loss of 2.50% for 2020-21 against approved Loss of 2.48%, actual loss of 2.16% for H1 of 2021-22 and projected loss levels of 2.46% and 2.44% for 2021-22 and 2022-23 respectively as per trajectory.

As is evident from the above discussions, there is wide variation in the projections and actuals since the commissioning of Boundary Metering. In fact the trajectory set in the year 2017-18 had to be revised and since then, there is no visibility of any pattern/firmness in the Transmission loss levels and its reduction despite the requisite capital investments. It is evident that there are some areas where the PSTCL needs to focus.

PSTCL has not offered any reasons for such wide variations in the ARR text but in the reply to Directive No 5.1 has stated that the L-1 bidder has been finalised under SAMASAT scheme and petition is pending for approval of PSERC. Thus the uncertainty will go on now till SAMASAT scheme is implemented in PSTCL. This needs to be critically reviewed as PSTCL has failed to show credible results since its formation in April 2010. Consumers can not be loaded with revenue requirements repeatedly for such laxity of the Transco.

We request the Hon'ble Commission that keeping in view the poor performance of PSTCL, Transmission Loss level as per trajectory or actuals whichever is lower be approved for PSTCL for these years under consideration since this is a Controllable element of tariff as per PSERC MYT Regulations and boundary metering has already been commissioned in 2017-18 though after 8 long years since PSTCL's formation and 4 years have passed since meters are in place and further, capital expenditure is being approved as required by PSTCL.

We also request for revisiting the provisional loss levels approved by the Hon'ble Commission since 2010-11 and grant relief to consumers. Consumers were made liable

for coal washing charges of PSPCL alongwith interest for previous period and on the same principles, they are entitled to relief on this count.

2. Equity and Return on Equity

A) The equity of GOP in the then PSEB was Rs 2806.11 Cr as per first tariff order issued by PSERC as under:-

6.10. EQUITY AND RETURN ON EQUITY

The Government of Punjab has declared the PSEB as a body corporate with a Capital of Rs. 5 crores with effect from 10th Mach 1987 under Section 12A of Electricity (Supply) Act 1948 and converted Rs. 1612 crores representing Government loans granted upto 3/90 into equity during 1991-92 and Rs.1189.11 crores representing 50% of loans granted during 1990-91 to 1994-95 in 1996-97. The total State Government Equity in PSEB is Rs.2806.11 Crores.

It is evident that this equity was only and only by conversion of GOP Loans. However no ROE was provided on the same in Tariff Order 2002-03 and after till 2005-06 by this Hon'ble Commission under Electricity Regulatory Commissions Act, 1998 and Electricity (Supply) Act 1948 and only 3% Return on Net Fixed Assets were allowed. The GOP loans given to the then PSEB were got converted into equity on different occasions by the then PSEB management(s) to reduce loan liability in its Books and to escape liability of payment of Interest on such loans and loan installments to insulate consumers from increase in tariff prior to setting up of Regulatory regime. Return on Equity of Rs 412.46 Cr per year was allowed only from 2006-07 onwards as per Para 4.15 of TO.

On formation of PSPCL and PSTCL on 16.4.2010, provisional FRP and transfer scheme was issued by GOP as per which the then existing equity of 2946.11 Cr was divided into two successor entities as Rs as Rs 2617.61 Cr for PSPCL and 328.50 Cr for PSTCL and ROE was allowed separately as Rs 366.47 Cr and Rs 45.99 Cr for PSPCL and PSTCL respectively.

GOP finalised FRP and Transfer scheme and notified the same on 24.12.2012 as per which an amount of of Rs.3132.35 crore standing in the books of PSEB on 15.4.2010 under the head "Consumer Contributions & Govt Grants" and some other amounts was also converted into equity of GOP and the same was admitted by PSERC as well. Thus the equity of PSPCL was enhanced from Rs 2617.61 Cr to 6081.43 Cr (Para 3.16 of TO 2013-14) and of PSTCL from 328.50 Cr to Rs 605.83 Cr. (Para 3.10 of TO 2013-14). Thus the total equity of PSTCL was increased from 328.50 Cr to 605.83 cr.

PSTCL has been proposing funding of Capital Expenditure with normative 30% equity and 70% funding in the ARRs starting from 2017-18 by manipulating MYT regulations though ARR figures clearly show that PSTCL is funding this equity contribution through

loans or alleged reinvestment/redeployment of "Return on Equity" (read "Profit") of the previous period. It is being pointed out that this ROE belongs to the GOP to which this equity belongs. Further, the issued and subscribed share capital as on 31.3.18, 31.3.19, 31.3.20 and 31.3.2021 remained same i.e. Rs 605.88 Cr in the Audited Annual Financial Statements of the respective years attached with ARR. Thus neither there was any investment in equity nor equity shares were issued to GOP. The Profit and Loss statement for these years supplied with the ARR indicated that PSTCL incurred net profit of Rs 4.03 Cr during 2017-18, net loss of 8.23 Cr during 2018-19, net loss of 34.96 Cr during 2019-20 and Profit of Rs 20.66 Cr during 2020-21 respectively. There are no free reserves as per Annual Financial Statements. No liability of Income tax is shown since cumulatively PSTCL is still under loss.

In spite of objections of stake holders, tariff order 2019-20 revealed that Hon'ble Commission allowed addition in equity of 96.92 Cr (30% of capex) in True up of 2017-18 raising the equity of GOP from 605.88 Cr to 702.80 Cr without any cash flow. The amount was further revised to Rs 705.71 Cr subsequently. This is clearly wrong as the amount was not invested in cash by GOP and funding was through redeployment of profit of Rs 4.03 Cr earned during the year and balance thro' loan based on the true up capex. In fact the entity was in loss cumulatively and it can not redeploy even this Rs 4.03 Cr and loans can not be redeployed as equity. It is evident that the system is being mis-utilised by the Licensee to earn about 7% of difference of interest rate of loan (8 to 9%) and ROE rate of 15.5%. ROE could be retained by a company to meet losses, if in loss or to pay dividends, if in profit. Accepting the sentiments of consumers, similar demand in true up of 2018-19 seeking equity addition of 73.58 Cr was rejected by PSERC and ROE of Rs 109.38 Cr was allowed in TO 2021-22 for all the three years of 2019-20 (TU) and 2020-21 (RE) and 2021-22.

In the true up of 2020-21, PSTCL again raised demand for addition in the equity based on the redeployment of profit of Rs 20.68 Cr and increased equity from 705.70 Cr to 726.38 Cr. For subsequent years, We request the Hon'ble Commission to reject the argument of PSTCL and allow this amount in the capex loan of PSTCL.

We also submit that total equity of PSTCL be withdrawn since there is no cash flow from GOP and all the amounts shown are infact loans taken at 7% to 12% while consumers are being made to pay 15.5% to 16.5% ROE on the same. The case of consumer contribution and GOP grants converted into equity through FRP/Transfer scheme is even more worse for consumers since these amounts were not bearing any interest but after conversion into equity, PSRCL and PSPCL have started earning ROE of around 16% on the same since 16.4.2010 which is nothing but fleecing of the consumers by wrongly interpreting the Regulations. Electricity Act 2003 casts a duty on the SERC to protect the interest of consumers as well.

B) It is also submitted that PSPCL has itself admitted that gross fixed assets (Capital funding) of GNDTP were created through loans and no infusion of equity was made at any stage. (Reference para 2.20, page 56-57, Tariff Order dated 28th May 2021). The relevant part is reproduced below

"The Commission has considered project-wise RoE based on the RoE approved in True-up of FY 2017-18. As PSPCL did not submit project-wise/ plant-wise equity during the True-up of FY 2017-18, the allocation was done based on GFA. Further, PSPCL had submitted project report of GNDTP in which it is mentioned that there had been no infusion of equity in GFA of GNDTP and the same was financed completely through loans."

Thus, the equity shown in TO 2002-03 is conversion of loans only through paper transactions and it can not count for ROE.

C) Hon'ble Commission lowered the Interest on Security (Consumption) of consumers from SBI rate plus 2% to RBI rate to lower the ARR of PSPCL though the interest was ultimately paid upfront by consumers in tariff and received back at the close of year. However, here PSERC has allowed PSTCL to earn ROE merely by relocating the figures from Loan to equity and this amount is just being retained by PSTCL for meeting unapproved expenditure without regulatory scrutiny. Moreover, the practice which was illegal beyond and after MYT period can not become legal for one year.

D) It is also submitted that the ROE on Consumer Contribution and GOP Grants etc was challenged before APTEL by some consumers which has decided inter alia that GOP can hold any amount of equity in the Licensee' capital funding but ROE can be given only on the amount duly subscribed (in Cash) and for which shares are duly issued. The order has been challenged by PSPCL and GOP in Supreme Court and Stay has been granted but the final decision on the same is yet to come. The conversion is also objected by CAG in their audit reports holding that the conversion is against the financial principles.

3. It is also added here that Forum of Regulators constituted a sub group for study of ways to reduce retail tariff and a report was prepared on "ANALYSIS OF FACTORS IMPACTING RETAIL TARIFF AND MEASURES TO ADDRESS THEM" (2020). Incidentally, ex Chairperson, PSERC happened to be chairperson of the Sub Group which prepared the above said report and Staff of this Hon'ble Commission may be aware of the same. The report analyzes the mechanism of the tariff fixation in detail and need for bringing modifications to make it more relevant and reduce the power tariff in different states. In para 2.1.3 of the report, which deals with fixed cost related factors, it is mentioned that

"A comparison of the RoE allowed by different States for generation, transmission and distribution revealed that the post-tax RoE has been in the range of 14% - 16%. An analysis was also made regarding the prevailing cost of debt and it was found that the lending rate has been on the lower side for quite some time. While the RoE has an element of risk premium, the data analysis revealed the need for reconsidering the RoE keeping in view the prevailing prime lending rate and 10 - year G-Sec rate.

Further, on Return on Equity, The sub group has stated on page 22 of the report in para 4.1.1, which is reproduced below:

4.1.1. Return on equity allowed to Generation/ Transmission and distribution companies needs to be made more realistic and at par with interest rates.

- RoE for generation and transmission should be linked to the 10 year G Sec rate (average rate for the previous 5 years) plus risk premium subject to a cap as may be decided by appropriate Commission.
- For a discom, the RoE could be fixed based on the risk premium assessed by the State Commission. Income tax reimbursement should be limited to the RoE component only.
- Performance of Distribution licensees has a significant impact on retail tariff for the consumers. Therefore, there is a need to link recovery of RoE with the performance of the utilities, based on the indicators such as supply availability, network availability, AT&C loss reduction".

Hon'ble Commission is requested to implement the above recommendation at the earliest and reduce the rate of ROE to prevailing interest rate only as there is no risk factor involved and Hon'ble Commission is allowing the justified revenue as per MYT regulations. Further, all the equity shown in the books is either loan or consumer contribution etc.

4. On this issue of Equity and ROE, we also submit that Regulation 19.2 of MYT Regulations 2019 reproduced in Para 4.7 of ARR is very clear that Sub Reg (d) is subject to Sub Reg (b) and (c) and Paid up capital will include investment from share premium and free reserves for the purpose of equity subject to normative debt equity i.e. only paid up equity will be considered and if it will be 30% or actuals whichever is lower.

PSTCL has to realise that the ROE is being retained by it and not being paid to GOP which has invested the equity. It should result in profit equivalent to ROE amount in the balance sheet of PSTCL whereas it has incurred losses indicating that it is over expanding or working inefficiently and investments are not giving returns as projected. Instead of controlling its expenditure and operating efficiently, it is trying to manipulate the loop holes of the system to earn extra money thro' ROE which is ultimately going to

raise the Tariff for consumers and also the subsidy of GOP. The tariff in Punjab including ED+IDF is already among the highest in the country and still higher tariff will force the consumers to consume less and industry will close down resulting in lower revenue and more increase in tariff.

PSERC is therefore requested to implement the provisions in true letter and spirit and do not allow conversion of loan into equity under these Regulations.

5. As per Balance Sheet for 2020-21, PSTCL has Other Equity (Reserves and Surpluses) of Rs 2232.89 Cr and Equity of Rs 605.88 Cr. which works out to 3.69 times the equity amount. Consumers are being made to pay 15.5% ROE on the equity amount whereas Reserves and surplus are not earning any revenue for PSTCL or the consumers. Therefore, PSTCL should explore liquidation of some portion of equity back to GOP so that the burden of ROE is reduced and Tariffs could be lowered,

6. The input energy at Punjab Periphery for 2019-20 (Table T23) has been indicated as 51422 MUs. However, PSPCL in its ARR (Table 11) has worked out the energy input at state periphery as 56391 MUs. PSPCL has claimed actual Transmission & Distribution Loss of 12.99 and 2.30% for 2020-21 though PSTCL has sought loss level of 2.50%. Distribution loss level has been projected as 12.99% against approved level of 12.94%. This needs to be looked into and Energy availability need to be reconciled and counted as per actual or approved trajectory separately for Transmission and distribution system.

7. Total Transmission Capacity calculated is 13152 MW, 13955 MW and 13540 MW in Table T22 of ARR for the years 2020-21, 2021-22 and 2022-23 respectively. As against this the peak demand recorded in 2020-21 and 2022-23 was 13148 and 13556 respectively. However, the capacity in Punjab SLDC web site under Availability Tab is 13845 MW as on 30.4.2021. Thus with projected demand of around 14000 MW and transmission capacity of 13540 MW, the state is headed for power cut in 2022-23. Moreover the new capacity addition of around 1500 MW in 2021-22 and 2022-23 is of solar and wind power which is infirm power.

8. The total contracted capacity of PSPCL in the year 2022-23 is given as 13540 MW in Table T 22. However, transformation capacity of PSTCL on 31.3.2022 is 38922.67 MVA which is 2.874 times the peak demand of 13556 MW met so far / 13540 MW of the contracted capacity. The capital investment plan of PSTCL need to be reviewed and it should be commensurate with the reduction trajectory of Transmission loss to give relief to consumers. PSTCL/SLDC may also be directed to carry out TTC and ATC studies for the state system to determine the safe transfer capacity and publish it on web site.

9. As brought out on Page 19-21 and 51-55 of current ARR, PSTCL has some reservation on net or gross employee cost for calculation of Employee cost. PSTCL has

worked out the Employee Cost as per practice adopted by PSERC. However, PSPCL has not raised any such issue in its Generation, Distribution and Retail Supply ARR. This issue was also raised by PSTCL last year also but was not agreed to by PSERC and as submitted by PSPCL in these paras of ARR. Now PSTCL is reserving its right to claim difference on the outcome of Appeal filed in APTEL. PSERC is requested to implement MYT regulations as these have attained finality since no Appeal has been filed on MYT regulations by PSTCL in High Court. Matter needs to be perused vigorously in APTEL.

It is also submitted that Hon'ble Commission should also file SLP's in Hon'ble Supreme Court in cases where its orders are reversed by APTEL as is being done by the PSPCL/PSTCL who are approaching Supreme Court against PSERC.

10. Year wise Non-Tariff income figures in Format T28 for all years, T-1 for 2021-22 and 2022-23 and figures in tables of Para 2.13 and 3.13 of ARR are not tallying. Further, Non-Tariff Income for 2022-23 need to be increased on normative basis.

Licensee has to understand that the exercise of ARR and determination of tariff is not an exercise to recover each and every expenditure from the consumers but only legitimate and justified revenue requirement as permissible under MYT regulations. PSTCL has to realise that the ultimate tariff payable by consumers cannot be increased infinitely and it has to be competitive with regard to neighbouring states.

We request the Hon'ble Commission to allow only prudent costs and revenue requirement strictly in accordance with MYT regulations.

We also crave leave of the Commission for submitting any additional observation/comment at a later date and at the time of hearing. We further request for giving a chance to elaborate our points during public hearing.

Yours faithfully,



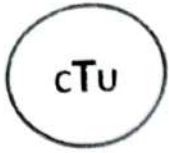
President

CC : Chief Accounts Officer (Finance & Audit), 3rd floor, Shakti Sadan,
Opposite Kali Mata Mandir, PSTCL, Patiala

<fa@pstcl.org>

Public Hearing -
17/2/22

objection
17/2/2022
1/18
President (M) 9872533815



CYCLE TRADE UNION (REGD)

AIRI CYCLES, 110-111, NEW CYCLE MARKET,
GILL ROAD, MILLER GANJ, LUDHIANA-141003.

REGISTERED

14.02.2022

CTU/333/2022

The Secretary
Punjab State Electricity Regulatory Commission,
Site No.3, Block-A, Sector-18, Madhya Marg, CHANDIGARH – 160018.

Subject : Petition No. 68 of 2021 of PSPCL and Petition No. 67 of 2021 of PSTCL appeared in the Tribune Dated 11.12.2021 & 16.12.2021 respectively.

Dear Sir,

Reference your advertisements appeared on the above noted subjects.

In reply, Our Association strongly oppose, resent any increases / amendments for next years and with retrospective effect in Tariff as well as fixed charges for all types of consumers of PSPCL & PSTCL of Punjab.

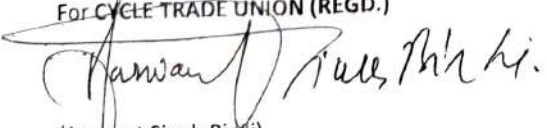
PSPCL lists of Rs. 125 Crores deficit before PSERC (attached proof) which We do not trust with their inflated, enhanced, created as well as fabricated figures shown in your above noted Petitions without the production of original Audited – Certified balance sheets of PSPCL & PSTCL to check their in depth truth of Deficits & irregularities.

We attach herewith print outs with Non-Tariff Income No : - 3.21 & estimated subsidy No : - 3.22 which should be kept continue from their existing resources & we support it.

Moreover, the tariff as well as fixed charges of Punjab are already unbearable. If the PSPCL & PSTCL can't control their inventories and losses as desired. Please handover these white elephants of Punjab to the private players as is done by the Central Government.

Our Association is going to participate in the PSERC, Chandigarh public hearing dated 17.02.22.

Thanking You
Your faithfully
For CYCLE TRADE UNION (REGD.)


(Jaswant Singh Birdi)
President.

- Copy to :
1. The Chief Engineer / ARR & TR, PSPCL, F-4, Shakti Vihar, Patiala as a proof of service.
 2. Chief Account Officer (Finance and Audit), PSTCL, 3rd floor, Shakti Sadan, Opp. Kali Mata Mandir, The Mall, Patiala as a proof of service.

PSPCL lists ₹125-cr deficit before regulator

By **ANURAG KUMAR**

POLL SOPS In contrast, expenditure may hit ₹12,245 cr, from ₹10,621 cr



The financial burden on the Punjab State Power Corporation Limited (PSPCL) has increased with recent Punjab Government announcements of subsidised/free power ahead of the Vidhan Sabha polls. The 2021-22 expenditure is estimated to reach around Rs 12,245 crore, up from Rs 10,621 crore.

However, in its tariff petition for the year 2022-23, the PSPCL has projected a gap of Rs 125 crore only, in view of the poll season, claim experts.

As per the annual revenue requirement (ARR) filed by the PSPCL, the gap of previous years amounts to Rs 1,611

crore thus making a total revenue gap of Rs 1,912 crore.

The total ARR has been worked out Rs 36,484 crore and the revenue receipt on the basis of present approved tariff has been worked out as Rs 36,702 crore.

As the power regulator always reduces the expenditure proposed by the PSPCL, there may not be any hike in power rates, despite the gov-

ernment reducing the prices. As per the ARR, the major expenditure is for power purchase. The purchase has been estimated at Rs 24,910 crore, including interstate transmission charges.

The other major expenditure is of employees' salary and pensions and this has been worked out at Rs 5,552 crore. However, in order to subdue the ARR in the elec-

tion year, the PSPCL has not included any payments to employees against pay revisions. As per information, against pay revision, the total arrears will amount to about Rs 3,000-3,500 crore, of which around Rs 1,000 crore are payable in 2021-22 and balance in the coming years.

Experts suggest the subsidy burden on the state government for subsidised power for 2021-22 is estimated at Rs 12,245 crore and for 2022-23 at Rs 13,929 crore. "Initially, the figure for 2021-22 was Rs 10,621 crore but the current pre-poll announcements by the government have resulted in additional burden of Rs 1,624 crore," they said — TNS

3.21 Non-Tariff Income

3.21.1 Non-Tariff income for FY 2021-22 and FY 2022-23 is retained at the same level as proposed by PSPCL for FY 2020-21.

3.21.2 It is requested that Hon'ble Commission may kindly allow the revised Non-tariff Income of Rs. 812 Crores to PSPCL for FY 2021-22 and FY 2022-23.

3.22 Estimated Subsidy

3.22.1 For AP consumption the total sale of respective year and average billing rate of FY 2021-22 and FY 2022-23 is considered for calculation of subsidy for the control period.

3.22.2 Subsidy for Scheduled Castes DS Consumers, Non-Scheduled Castes BPL DS Consumers and Backward DS Consumers has been estimated based on existing average billing rates for Domestic consumers for having load upto 2 kW on projected consumption for FY 2021-22 and FY 2022-23.

3.22.3 Government of Punjab vide its letter no. FE-40BDGT/22/2021FE4/1/231982/2021 dated 18th August 2021 has approved funds of Rs. 38-Crore on account of electricity concession of 300 units per month to the successors / grandchildren of Freedom Fighters of the within the State of Punjab and the same has been approved by the Hon'ble Commission vide its Suo-moto Order dated 17th November, 2021. Therefore, PSPCL has considered the approved amount of subsidy for FY 2021-22 and FY 2022-23.

3.22.4 In addition to above, the Government of Punjab has notified the subsidy of Rs. 2.50/Unit for Domestic consumers having load upto 7 kW vide its notification no. 1/273/2021/Cabinet/7811 dated 2nd November 2021. While, estimating the subsidy for FY 2021-22, PSPCL has worked out the amount of subsidy for 5 months to the tune of Rs. 1,123 Crore. Further, the amount of subsidy for FY 2022-23 is worked out as Rs. 3,101 Crore.

3.22.5 In continuation to above, it is submitted that Government of Punjab has subsidized the 50% of the fixed charges of all MS category consumers vide its notification no. 1/272/2021/Cabinet/7678 dated 29th October 2021. While, estimating the subsidy for FY 2021-22, PSPCL has worked out the amount of subsidy for 5 months to the tune of Rs. 49 Crore. Further, the amount of subsidy for FY 2022-23 is worked out as Rs. 124 Crore which has been included in subsidy of MS category shown in table 49 of this petition.

3.22.6 Further, Government of Punjab has waived off the arrears of domestic consumers having load upto 2 kW vide its notification no. 1/246/2021/Cabinet/6517 dated 30th September 2021. The same will have financial impact of Rs. 1,555 Crore, PSPCL prays to the Hon'ble Commission to consider the aforesaid amount while carrying out subsidy balanced due from the Government of Punjab.

3.22.7 The following tables provide summary of subsidy receivable for FY 2021-22 and FY 2022-23 as per the projections for the period.

Table 48 Subsidy receivable for FY 2021-22 and FY 2022-23 (Rs. Crore)

Particulars	FY 2021-22	FY 2022-23
AP Consumers	6,767	6,936
DS Subsidy upto 7 kW	1,123	2,303
Scheduled Castes DS Consumers	1,323	1,349
Non- SC BPL DS Consumers	73	75
Backward Class DS Consumer	228	233
Small Power	142	137
Medium Supply	346	411
Large Supply	2,205	2,415
Freedom Fighter	38	38
Total	12,245	13,929

PUNJAB STATE POWER CORPORATION LIMITED
THE MALL, PATIALA 11/12/21.
TRIBUNE PUBLIC NOTICE

Public Notice in respect of Petition No. 68 of 2021 for True-up for FY 2020-21, Annual Performance Review (APR) for FY 2021-22 and ARR & Determination of Tariff for the FY 2022-23 filed by Punjab State Power Corporation Limited before Punjab State Electricity Regulatory Commission.

- Notice is hereby given to all that the Punjab State Power Corporation Limited (PSPCL) engaged in electricity Generation, Trading, Distribution and related activities has filed the subject cited Petition before the Punjab State Electricity Regulatory Commission (Commission). The aforementioned Petition has been admitted by the Hon'ble Commission on 03.12.2021 as Petition No. 68 of 2021.
- Copies of the Petition are available in the office of the Chief Engineer/ARR & TR, PSPCL, F-4, Shakti Vihar, Patiala, and also in the offices of all Chief Engineer(s) (Operations) and all Superintending Engineer(s), in-charge of Operation Circles of PSPCL. Soft copies of the same are also available on the website "www.pspcl.in" of PSPCL and "www.pserc.gov.in" of PSERC and can be downloaded therefrom.
- Interested persons may inspect and peruse the said Petition and take notes thereof during office hours at the above said offices free of charge.
- Copies of the above documents can also be obtained from the above offices on payment of Rs. 500/- for each set. **JASWANT SINGH BIRDHA 98729 53815**
- Objections to the said petition, if any, together with supporting material, may be filed with the Secretary, Punjab State Electricity Regulatory Commission, Site No. 3, Block B, Sector 18-A, Madhya Marg, Chandigarh, in person or through Registered Post, so as to reach him within 30 days of the publication of this notice. Copy of the same must also be sent to the Chief Engineer/ARR & TR, PSPCL, F-4, Shakti Vihar, Patiala and proof of service of the same must be enclosed with the filing made to the Secretary, Punjab State Electricity Regulatory Commission.
- The objections as above should be filed in twelve number copies and should carry signature, full name, postal address and telephone/mobile number/email ID of the person sending the objections. All the objectors may also send a soft copy of their objections to the Secretary/PSERC at email id "secretarypsercchd@gmail.com". If the objection is filed on behalf of any organization or any class of consumers, it should be so mentioned. It may also be specifically mentioned if the person putting in objections/comments also wants to be heard in person.
- The Punjab State Electricity Regulatory Commission, after perusing the written objections received in response to this notice may invite such objector(s) as it considers appropriate for a hearing on dates which will be notified by the Hon'ble Commission in due course.
- For the information of general public/stakeholders, the summary of the submissions as contained in the Petition is as under:

Summary of ARR for FY 2020-21, FY 2021-22 & FY 2022-23

Sr. No.	Particulars	Trueing-UP for FY 2020-21			APR for FY 2021-22		ARR for FY 2022-23	
		FY 2020-21			FY 2021-22		FY 2022-23	
		Approved in 2nd MYT Order dt. 1st Jun 2020	Approved in APR in Tariff order dt. 28th May 2021	Submitted for True-up	Approved in Tariff Order dt. 28th May 2021	Submitted for APR	Approved in 2nd MYT Order dt. 1st Jun 2020	Revised Estimates for ARR
1	Fuel Cost	1853	1497	675	1355	1331	1991	1896
2	Power Purchase Cost							
2.1	Cost of power purchase	20709	19766	22041	22739	22629	25191	23512
2.2	Intra-State Transmission Charges	1345	1333	1334	1332	1332	1416	1398
3.3	O&M Expenses							
3.1	Employee Cost	4837	4860	4808	5005	5268	5263	5552
3.2	R&M Expenses	455	398	356	416	412	533	423
3.3	A&G Expenses	194	190	157	200	196	211	211
4	Interest & Finance Charges							
4.1	Interest Charges	540	692	884	766	741	585	736
4.2	Interest on Consumer Security Deposit	163	164	124	158	150	179	150
4.3	Interest on Working Capital	139	129	687	139	631	168	578
5	Depreciation	1375	1359	1283	1420	1458	1512	1499
6	Return on Equity	975	975	1684	975	1684	975	1684
7	Provision for DSM Fund	0	0	2	0	5	0	16
8	Royalty Paid by RSD to GoP	14	14	9	15	15	15	15
9	Provision for Bad & Doubtful Debts	0	0	74	0	0	0	0
10	Other Debts	0	0	404	0	0	0	0
11	Total Revenue Requirement (A)	32600	31375	34520	34618	35850	38046	37659
12	Less: Non-Tariff income (B)	1081	821	812	821	812	1191	812
13	Net Revenue Requirement (A-B)	31519	30554	33709	33697	35039	36848	36848
14	Less Revenue from Existing Tariff			31567		35021		36702
15	Less Revenue from Outside State Sale			41		21		21
16	Gap (-)/Surplus (+) for the year			-2101		4		-125
17	Add: Gap (-)/Surplus (+) for previous years			699		-1615		-1611
18	Add: Carrying cost on Gap (-)/Surplus (+) during the year			-213				-176
19	Cumulative Gap (-)/Surplus (+) up to the year			-1615		-1611		-1912

Note: Minor difference in Totals may be due to rounding off of figures.

Sd/-Chief Engineer ARR & TR,
 Shed No. F-4, Shakti Vihar,
 PSPCL, Patiala

PUNJAB
KESARI (LDH)

द मॉल, पटियाला 11/12/2024.
सार्वजनिक सूचना

वित्त वर्ष 2020-21 के लिए अ-प, वित्त वर्ष 2021-22 के लिए सांख्यिकी कर्मचारी संपीडा तथा वित्त वर्ष 2021-22 हेतु एआरआर तथा दूर निर्धारण के लिए पंजाब स्टेट पावर कार्पोरेशन लिमिटेड द्वारा पंजाब राज्य विद्युत नियामक आयोग के समक्ष दाखल की गई 2021 की पटीशन नं. 68 के संबंध में सार्वजनिक सूचना

- एतद द्वारा सभी को सूचित किया जाता है कि पंजाब स्टेट पावर कार्पोरेशन लिमिटेड (पी.एस.पी.सी.एल) कोकि विजली उत्पादन, व्यापार, वितरण तथा संबंधित प्रक्रियाओं में चुटी हुई है, की ओर से पंजाब राज्य विद्युत नियामक आयोग (कमीशन) के समक्ष विचय वर्णित पटीशन दर्ज की है। यह 2021 की याचिका नं. 68 के अनुसार 03.12.2021 को माननीय आयोग द्वारा स्वीकृत कर ली गई है। **JASWANT SINGH (BIRDIM) 98729 53815**
- पंजाब राज्य विद्युत नियामक आयोग द्वारा बर्दाई गई कमियाँ तथा कमियों के तुरंत समेत पटीशन को प्रिनसिपल अभियंता/एआरआर तथा टीआर/पीएसपीसीएल, एफ-4, शांति विहार, पटियाला तथा सभी मुख्य अभियंता (ओ) (खालसा) व सभी अधीक्षण अभियंता (ओ), पीएसपीसीएल के अप्रेशन सर्विस के प्रभारियों के कार्यालयों में भी उपलब्ध है। इसकी सौफ प्रिनसिपल पीएसपीसीएल की वेबसाइट www.pspcl.in और पीएसईआरसी की वेबसाइट www.pserc.in पर भी उपलब्ध है एवं यहां से डाकनोट्स की जा सकती है।
- इच्छुक व्यक्ति उक्त पटीशन का निरोधान एवं प्रस्तावित कर सकते हैं एवं उपरोक्त कार्यालयों से कार्यालय समय दौरान नि:शुल्क नोट्स ले सकते हैं।
- उपरोक्त दस्तावेजों की प्रतियां 500 - रुपए प्रति सेट के पुरतान, पर उक्त कार्यालयों से भी प्राप्त की जा सकती है।
- उक्त याचिका के एतराज यदि कोई हो, संबंधित सामग्री के साथ विजी वीर पर या रजिस्टर्ड डाक के माध्यम से सविध, पंजाब राज्य विद्युत नियामक आयोग, साइट नम्बर 3, मध्य मार्ग, सेक्टर 18-ए, चंडीगढ़ को दर्ज करा सकते हैं जो कि इस नोटिस के प्रकाशन से 30 दिनों के भीतर पहुंच जाने चाहिए। इसको प्रति मुख्य अभियंता/एआरआर तथा टीआर, पीएसपीसीएल, एफ-4, शांति विहार पटियाला को भी भेजी जाए एवं इसकी सेवा का प्रमाण सविध, पंजाब राज्य विद्युत नियामक आयोग, चंडीगढ़ को भी फ्लॉपिंग के साथ संलग्न करना चाहिए।
- उपरोक्त अनुसूच पतराज बाह्य प्रतियों में भर होने चाहिए एवं पतराज भेजने वाले व्यक्ति के इन्सुफर, पुर नाम व दम्प, एल, टेलीफोन नम्बर, नं. email ID होना चाहिए। सभी पतराजकर्ता अपने पतराजों को साइट/कापी साइट/पीएसईआरसी के कार्यालयों में भेजें। यदि पतराज किसी संगठन या कार्यालय की फिली से भेजे हैं, तब 'secretarypsercchd@gmail.com' पर भी भेजें। यदि पतराज किसी व्यक्ति के द्वारा भेजे जा रहे हैं, तब व्यक्ति को नोटिस के तहत निर्दिष्ट किया जाना चाहिए। यह भी इसमें स्पष्ट रूप से निर्दिष्ट करना चाहिए कि एतराज/टिप्पणियाँ करने वाले व्यक्ति निजी तौर पर सुनवाई नहीं कर सकते हैं।
- इस नोटिस के प्रतिक्रम में प्राप्त लिखित एतराजों को प्रस्तावना के प्रस्ताव पंजाब राज्य विद्युत नियामक आयोग/प्रतियों को समय रहते आयोग द्वारा अधिसूचित की जाएगी, जो ऐसे एतराज करने वालों को सुनवाई हेतु उपपुक्त मानता है, अधीनत्र कर सकता है।
- जनरल पब्लिक/हितधारकों की सूचना हेतु पटीशन में दर्ज प्रतियाँ संक्षेप में नीचे लिखे अनुसार हैं:

(क. करोड़ में)

क्र. सं.	विवरण	वित्त वर्ष 2020-21 के लिए पूर्व अंश			वित्त वर्ष 2021-22 के लिए पूर्व अंश		वित्त वर्ष 2022-23 के लिए पूर्व अंश	
		वित्त वर्ष 2020-21	वित्त वर्ष 2020-21	वित्त वर्ष 2020-21	वित्त वर्ष 2021-22	वित्त वर्ष 2021-22	वित्त वर्ष 2022-23	वित्त वर्ष 2022-23
1	कुल लागत	1853	1497	675	1355	1331	1991	1886
2	विद्युत खरीद की लागत							
2.1	विद्युत खरीद की लागत	20709	19766	22041	22739	22629	25191	23512
2.2	हेट्ट स्टेट ट्रांसमिशन चार्जिस	1345	1333			13332	1416	1398
3	ओ एंड एम खर्च							
3.1	कर्मचारी लागत	4837	4860	4808	5005	5269	5263	5552
3.2	अन्य एंड एम खर्च	455	398	356	416	412	533	423
3.3	ए एंड ओ खर्च	194	190	157	200	196	211	211
4	व्याज व वित्त शुल्क							
4.1	व्याज शुल्क	540	692	884	766	741	585	736
4.2	उपरोक्त विवरणों की बचत पर व्याज	163	164	124	158	150	179	158
4.3	कार्यशील पूंजी पर व्याज	139	129	687	139	631	168	578
5	मूल्य ह्रास	1375	1359	1283	1420	1456	1512	1499
6	इंजिटी पर रिटर्न	975	975	1684	975	1684	975	1684
7	डीपसिट फंड हेतु प्रवधान	0	0	2	0	5	15	15
8	आरएसटी से जीआरपी को अट रायल्टी	14	14	9	15	15	0	0
9	अभोध तथा सौंदर्य कर्मों के लिए प्रवधान	0	0	74	0	0	0	0
10	अन्य इंजिटी	0	0	404	0	0	0	0
11	कुल अपेक्षित राजस्व (ए)	32600	31375	34520	34518	35850	38340	37689
12	कम : गैर-दर आय (बी)	1081	821	812	821	812	1191	812
13	कुल अपेक्षित राजस्व (ए-बी)	31519	30554	33709	33697	35039	36848	36848
14	वर्तमान दर पर कम राजस्व			41		21		21
15	राज्य के बाहर विक्रियों का राजस्व							-128
16	-जीएपी (-)/सरप्लस (+) वर्ष के लिए			-2101		-1615		-1611
17	अति: गैर (-)/सरप्लस (+) पिछले वर्षों हेतु			699				-176
18	अति: जीएपी (-)/सरप्लस (-) जीएपी पर करिंग लागत			-213		-1611		-1912
19	संबंधित जीएपी (-)/सरप्लस (+) वर्ष तक							

नोट: जमा में मामूली अंतर आंकड़ों की रजिस्ट्र ऑफ के कारण हो सकता है।

मुख्य अभियंता/ए.आर.आर. एवं टी.आर. शौक नं. एफ-4, शांति विहार पीएसपीसीएल, पटियाला

C 437/21

DPR/76155/12/572/2021/11052

विजली के बिल की पीएसपीसीएल की वेबसाइट www.pspcl.in पर 24/7 अटेंडिंग सहायता के लिए

पंजाब में सुसवी बिजली
दरें 1 नवंबर से लागू



चंडीगढ़, पटियाला, 23 नवम्बर
(शुक्र, म.ह.): पंजाब सरकार ने
गुज्य के श्रेय बिजली उपभोक्ताओं,
जिनका मंडुखुदा बिजली बोर्ड 7
किलोवाट
से कम है,
को बड़ी राहत दी है।

अधिसूचना जारी

इसे उपभोक्ताओं को बिजली
बिलों में 3 रुपए प्रति यूनिट की
रियायत देने के फैसले के बाद पंजाब
पावरकॉम ने इस संबंध में
अधिसूचना जारी कर दी है।

यह (विशेष पृष्ठ 2 का अंश) है।
पंजाब में सस्ता बिजली...

रियायत राज्य के सभी पंचल बिजली
उपभोक्ताओं को 1 नवम्बर से देने
के संबंध में अधिकाधिक को निर्देश
जारी कर दिए गए हैं।

मुख्यमंत्री चरणजीत सिंह चानू
की तरफ से बिजली दरों में 3 रुपए
की कटौती करने के फैसले के बाद
22 दिनों तक नोटिफिकेशन
जारी न होने का मामला 'पंजाब केसरी'
ने प्रमुखता से छपा था जिसका
संज्ञान लेते हुए आज पंजाब
राज्य बिजली निगम लिमिटेड
(पावरकॉम) ने सशोधित दरें लागू
करने का नोटिफिकेशन जारी
कर दिया।

PUNJAB STATE ELECTRICITY REGULATORY COMMISSION

SITE NO. 3, SECTOR 18-A, MADHYA MARG
CHANDIGARH - 160018 30/12/24.

NOTICE FOR PUBLIC HEARINGS

1. Petition No. 67 of 2021 of Punjab State Transmission Corporation Limited (PSTCL) and Petition No. 68 of 2021 filed by the Punjab State Power Corporation Limited (PSPCL) for True Up for FY 2020-21 Annual Performance Review (APR) for FY 2021-22, Revised Estimates and Tariff determination for FY 2022-23 have been filed before the Commission. Copies of the same are available on the websites of the utilities (www.pspcl.in and www.pstcl.org) as well as on the Commission's website (www.pserc.gov.in).

2. The Commission will be holding public hearings in connection with the above said petitions, as per programme given below:

Venue	Proposed Date & time of public hearing	Category of consumers to be heard
BATHINDA Conference Room, Guest House, Thermal Colony, PSPCL, Bathinda	January 14, 2022 (Friday) 11.00 a.m. to 1.00 p.m.	All consumers/organizations of the area
LUDHIANA Multi Purpose Hall, Power Colony, PSPCL, Opp PAU, Ferozepur Road, Ludhiana	January 20, 2022 (Thursday) 10.00 a.m. to 12.00 p.m.	All consumers/organizations of the area
JALANDHAR Conference Room, Office of Chief Engineer/Operation (North) PSPCL, Shakti Sadan, Jalandhar.	January 20, 2022 (Thursday) 3.00 p.m. to 5.00 p.m.	All consumers/organizations of the area
AMRITSAR VIP Guest House, PSPCL, Batala Road, Verka at Amritsar	January 21, 2022 (Friday) 11.00 a.m. to 1.00 p.m.	All consumers/organizations of the area
CHANDIGARH Commission's office i.e. Site No 3 Sector 18-A Madhya Marg Chandigarh - 160018	January 24, 2022 (Monday) 11.30 a.m. to 1.30 p.m. 3.00 p.m. to 4.30 p.m.	Industrial consumers/organizations Officers/Staff Associations of PSPCL and PSTCL
CHANDIGARH Commission's office i.e. Site No 3 Sector 18-A Madhya Marg Chandigarh - 160018	January 25, 2022 (Tuesday) 11.30 a.m. to 1.30 p.m.	All consumers/organizations except Industry

- All the objector who have filed their objections with the Commission and other persons/organizations interested in presenting their views/suggestions on the above mentioned matters before the Commission are invited to participate
- if any member of the public wants to attend the hearing virtually on 24.01.2022 and 25.01.2022 at Chandigarh at above mentioned time they may send their full name, contact No and valid email ID to registrarpsercchd@gmail.com and the link for the same will be provided by the Commission
- All the participants are requested to submit their views/suggestions in writing to the Secretary PSERC Site No. 3, Sector 18-A, Madhya Marg, Chandigarh - 160018

DPR/11/1891

Sd/- SECRETARY

पंजाब स्टेट इलेक्ट्रीसिटी रेगुलेटरी कमीशन

साइट नं. 3, सेक्टर 18-ए, मध्य मार्ग, चंडीगढ़-160018

पंजाब स्टेट पावर कॉर्पोरेशन लिमिटेड (पीएसपीसीएल) की ओर से विन वॉर 2020-21 के टू अप के लिए दायर याचिका नं. 68 तथा पंजाब स्टेट ट्रांसमिशन कॉर्पोरेशन लिमिटेड (पीएसटीसीएल) की याचिका नं. 67 ऑफ 2021 के लिए वार्षिक परफॉर्मेंस रिव्यू (एपीआर), वित्त वर्ष 2022-23 के लिए संशोधित एग्जटिवेटिव तथा टैरिफ निर्धारण आयोग के समक्ष दायर की गई है। उक्त को प्रतियोगी यूटोमेटिज की वेबसाइटों (www.pspcl.in एवं www.pstcl.org) के साथ-साथ आयोग की वेबसाइट (www.pserc.gov.in) पर उपलब्ध है।

2. आयोग उपरोक्त पटीशंस के संबंध में विपूरकित प्रोग्राम अनुरूप जनसुनवाई आयोजित करेगा।

स्थल	जनसुनवाई की प्रस्तावित तिथि व समय	उपभोक्ताओं की कैटेगरी जिनकी सुनवाई होगी
बठिंडा कार्फ़िस रूम, गैरट हाऊस, धर्मल कालोनी, पीएसपीसीएल, बठिंडा	जनवरी 14, 2022 (शुक्रवार) प्रातः 11.00 बजे से दोपहर 1.00 बजे	क्षेत्र के सभी उपभोक्ता/संगठन
लुधियाना मल्टीपुर्पस हाल, पावर कालोनी, पीएसपीसीएल, सामने पीएफू फ़िरोजपुर रोड, लुधियाना	जनवरी 20, 2022 (बोबरवार) प्रातः 10.00 बजे से दोपहर 12.00 बजे	क्षेत्र के सभी उपभोक्ता/संगठन
जालंधर कार्फ़िस रूम, कार्यालय मुख्य अधिपति/आप्रेशन (उत्तर), पीएसपीसीएल, शक्ति सदन जालंधर	जनवरी 20, 2022 (बोबरवार) दोपहर 3.00 बजे से सायं 5.00 बजे	क्षेत्र के सभी उपभोक्ता/संगठन
अमृतसर वीआईपी गैरट हाऊस, पीएसपीसीएल, बटाता रोड, वेरका एट अमृतसर	जनवरी 21, 2022 (शुक्रवार) प्रातः 11.00 बजे से दोपहर 1.00 बजे	क्षेत्र के सभी उपभोक्ता/संगठन
चंडीगढ़ कमीशन कार्यालय अर्थात साइट नं. 3, सेक्टर-18ए, मध्य मार्ग, चंडीगढ़-160018	जनवरी 24, 2022 (सोमवार) प्रातः 11.30 बजे से दोपहर 1.30 बजे सायं 3.00 बजे से सायं 4.30 बजे	औद्योगिक उपभोक्ता/संगठन पीएसपीसीएल व पीएसटीसीएल के अधिकारी व स्टाफ एम्प्लोईस
चंडीगढ़ कमीशन कार्यालय अर्थात साइट नं. 3, सेक्टर 18-ए, मध्य मार्ग चंडीगढ़-160018	जनवरी 25, 2022 (मंगलवार) प्रातः 11.30 बजे से दोपहर 1.30 बजे	उद्योग के अतिरिक्त सभी उपभोक्ता/संगठन

- सभी आपत्तिकर्ता जिन्होंने कमीशन के पास अपनी आपत्तियां दायर की हैं एवं आयोग के समक्ष उपरोक्त मामलों में अपने विचार/सुझाव प्रस्तुत करने के इच्छुक अन्य व्यक्ति/संगठन भाग लेने को आमंत्रित हैं।
- यदि जनता का कोई सदस्य 24.1.2022 तथा 25.1.2022 को चंडीगढ़ में उक्त वर्णित समय पर वर्चुअल तौर पर भाग लेना चाहता है तो वे अपना पूरा नाम, सम्पर्क नं. तथा वैध ईमेल आईडी registrarpsercchd@gmail.com पर भेजे तथा उसके लिए लिंक आयोग द्वारा उपलब्ध करवाया जाएगा।
- सभी भागीदारों को अपने विचार/सुझाव लिखित में सचिव पीएसईआरसी, साइट नं. 3, सेक्टर 18-ए, मध्य मार्ग, चंडीगढ़ के पास भी जमा कराने का निवेदन है।

DPR/NA/12/8109/2021/11891

सचिव

Objection No. 4.

PSEB ENGINEERS' ASSOCIATION

(Regd.)

President
Er. Jasvir Singh Dhiman
Addl. SE/P&M Divn.,
PSTCL, Malerkotla
Ph (M): 96461-18214
(O): 0175-2224440



General Secretary
Er. Ajay Pal Singh Atwal
Addl. SE, a/w, Director - D,
PSPCL, Patiala - 147 001
Ph (M): 96461-21834
(O): 0175-2224440

Ref. No: EA-691/92

Date: 17/2/2022

To
The Secretary
PSERC, Chandigarh.

Sub: Comments of PSEB Engineers' Association on PSTCL tariff
Petition no. 67/2021.

Enclosed please the comments of PSEB Engineers' Association on
PSTCL tariff Petition 67/2021, which are being submitted to the Hon'ble
Commission during public hearing of 17/2/2022

~~General Secretary~~
PSEB Engineers' Association

Copy: CAO (Finance & Audit), PSTCL, Patiala

DR
17/2/2022
Director
17/2/2022
in

Sub: Comments of PSEB Engineers' Association on PSTCL Petition 67/2021.

Comments are submitted as under

1. Page 12 Para 2.2 Table -1 description

In case of majority of 220 kV substation of PSTCL there is provision for one or more 220/66 kV power transformers, of 100 MVA or 160 MVA which gives supply to 66 kV grid substation of PSPCL in the vicinity the main elements of a typical 220 kV substation are

- a) Incoming / outgoing 220 kV lines
- b) 220 kV busbars
- c) 220/66 kV power transformers
- d) 66 kV busbars
- e) 66 kV switchgear (circuit breakers) giving supply to outgoing 66 kV lines.

All the equipments elements '(a) to (e) above are a part of 220 kV substations, i.e. PSTCL jurisdiction. The interface point or boundary between PSTCL and PSPCL is the substation gantry from where the first span of 66 kV outgoing lines begins. Alternately it can be stated that the jurisdiction of 66 kV line ends at the substation gantry at which the line ends. Thus, the 66 kV busbars and 66 kV switchgears installed as part of 220 kV jurisdictions.

It is concluded that the 66 kV switchgear and 66 kV bays located in premises of 220 kV PSTCL substations become a part of PSTCL jurisdiction while PSPCL jurisdiction begins from the substation gantry from where the 66 kV line starts.

The table -1 (Page 12) gives the data of transmission bays as under as on 1-4-2020

400 kV	72
220 kV	703
132 kV	505
Total	1280

However, the 66 kV bays and switchgear located within the premises/ boundary of 220 kV substation become a part of substation become a part of PSTCL system, and operation and maintenance of 66 kV switchgear is carried out by PSTCL personnel. The position of transmission bays needs to be corrected to include 66 kV bays located within 220 kV substation premises as under.

400	72
220	703
132	505
66	1205

2. O&M charges as per CERC norms.

In case of PSTCL petition, the O&M expenses have been worked out for 220-21 on the following principle/ methodology.

- a) Employee expenses
- b) R&M expenses
- c) Administration & General

Total O&M

While this procedure is based on cost-plus approach the CERC has adopted normative approach with O&M norms specified for following equipment / assets

- a) Substation bays (voltage wise)
- b) Transformers MVA
- c) Transmission lines with categorization based on
 - i) Single or double circuit
 - ii) Single or twin conductor as under for 2021

Rs. Lac/km/year

Single Circuit	Single conductor	0.26
Single circuit	Twin conductor	0.521
Double Circuit	Twin conductor	0.977
Double circuit	Single conductor	.419

2.1 O&M as per CERC norms.

Qty.	Description	Norm	Amount
360 km	400 kV Line S/C	0.521	1.88
1442	400 kV Line double	0.912	12.15
38187	S/S MVA	0.312	119
4235	220 kV line S/C	0.260	11.01
3629	220 kV line S/C	0.391	14.19
2494	132 kV line S/C	.260	6.48
599	132 kV line D/C	.391	2.34

Substation Bays

	400	220	132	66
Nos	72	703	505	1205
Norm	33.28	23.30	16.64	16.64
Rs. Crore	23.96	163.8	84.03	200.5

Total O&M of substation

Bays = 472.29 crore

Overall O&M Charges as per CERC = 640.34 crore

Thus, as against Rs. 589.84 crore claimed by PSTCL for O&M (true up 2020-21) the CERC norms result in O&M of Rs. 640.34 crore.

3. Transmission system availability Para 2.3 Table 2

The availability of transmission system during 2020-21 is shown as 99.8324%

Since this availability is much higher than the normative target of 99% (i.e. over achievement), vide table 26 page 37 PSTCL has claimed incentive of Rs. 9.88 crore.

3.2 Two suggestions are submitted.

First, that PSTCL may give a list of 220 kV or 400 kV line outage

for 2020-21 which are having duration more than 2 days. Only forced outage may be tabulated. The tabulation may be as under

Summary of forced outage of 220 kV or 400 kV lines > 2 days.

Sr. No.	Line under forced outage	Period of forced outage

This tabulation would give a practice and factual summary of outage duration during the year.

Second: The second suggestion is that the incentive of Rs. 9.88 crore may be utilized to procure critical spares for the transmission lines and substations of spillage. These spares could be maintained at any central location in Punjab which could be used for replacements at any substation or line as per requirement.

4. At para 12, table -1 of petitioner it is given that 400 kV lines are of 1599.75 circuit km whereas the data of NRLDC does not match.

The NRLDC data is as under

	Single Circuit	Double Circuit	Double circuit km
Amritsar-Makhu	-	64	128
Muktsar-Makhu	-	96	192
Nakodar-Makhu	-	52	104
Nakodar-Moga	78	-	-
Rajpura-Dhuri	-	86	172
Rajpura-Rajpura Thermal	-	9	18
Rajpura-Nakodar	-	139	278
T.Sabo-Dhuri	-	175	350
T.Sabo-Moga	102	-	-
T.Sabo-Nakodar	180	-	-
T.Sabo-Muktsar	-	100	200
TOTAL	360	721	1442

Total circuit km of PSTCL 400 kV lines as per NRLDC data =
 $360+1442=1802$

Length as per PSTCL = 1599.75

The PSTCL data may be cross checked with NRLDC figures

5. Manpower requirement for new 400 kV substation - page 51

The petition states about Commissioning schedule of new 400 kV substation Bahaman Jassa Singh and Dhanansh in 2021-22 (3 months) & 2022-23 (9 months) However, the staff is required to be posted at least 6 months in advance and put through on job training at nay of 400 kV substation of PSTCL and the prior on job training is absolutely necessary.

6. O&M norms of CERC have been notified for 5 years period 2019-24 and the norms, year wise, have an escalating trend as under. The norms of 2020-21, 2021-22 and 2022-23 are compared as under.

	2020-21	2021-22	2022-23
400 kV bays	33.28	34.45	35.66
220 kV bays	23.30	24.12	24.93
132 kV and below	16.64	17.23	17.83

(figures above in Rs. Lac per bay per year)
Transformer MVA (Rs. /MVA/year)

	2020-21	2021-22	2022-23
400 kV	.371	.384	.398
220 kV	.254	.263	.272
132 kV & Above	.254	.263	.272

Transmission lines (norms of double circuit line, with twin conductor)
in rs. Lac per ckt. Km.

	2020-21	2021-22	2022-23
Double circuit, twin conductor	.912	.944	.977

The CERC norms have an annual escalation trend as under

Substation bays	3.5%	Per year
Transformer MVA	3.5%	
Transmission lines	3.5%	

6.1 The O&M charges as per PSTCL petition are as under.

	2020-21	2021-22	2022-23
ARR Figure O&M	589.85 CR	673.92 CR	739 CR

7. Income from O&M of PGCIL bays.

At Table 24, page 34-35 it has been stated that Rs. 7.51 CR is the income from PGCIL on account of O&M by PSTCL done for PGCIL bays. The details and particulars of PGCIL bays that are being maintained by PSTCL may be given.

8. Page 44 Table 29,30

a) For 2020-21 the addition of 185 MVA in substation capacity has been stated for H-1 of year 2021-22 and 540 mVA addition during H-2. The particulars of these additions may please be stated.

b) for 2022-23 the table 30 indicates that 1600 MVA capacity will be added. The particulars of 1600 MVA transformers proposed to be added in 2022-23 may please be given.

9. Shortage of manpower

At page 91, Format T-6 the total manpower (actual), and comparison with sanctioned strength has been given as under.

	2020-21	2021-22	2022-23
--	---------	---------	---------

Working strength at beginning of year	2731	2523	2646
Sanctioned strength	5130	5159	5159
%age	53%	49%	51%

10. Format T-5 page 102

The amount of capital expenditure/ capitalization achieved for various items has been given in format T-15. The details of capital works executed as per list below may please be supplied.

For example at Sr. no. 4, page 102 it is shown that at 400 kV substation Makhu there was a capitalization of 30.77 crore but the details regarding the expenditure are not given. It is not known whether the amount was on account of switchgear or line or bldg/land.

The particulars of works may please be supplied on which the expenditure (capitalization) has been done as per list below.

Sr.	Substation	Amount (Cr.)	Particulars of capitalization
4	400 kV Makhu	30.77	Capitalization 21-22
5	220 KV Dhandari	3.07	Capitalization 21-22
9	220 kV Sadiq	9.61	Capitalization upto 19-20
10	220 kV Bajakhana	8.86	Capitalized 21-22
12	220 kV Sarai Nagar	12.24	Capitalized 22-23
14	220 kV Sherpur	11.69	Capitalized 22-23
16	220 kVBudhladha	22.58	Capitalized 22-23
18	400 kV Dhanansu	30.89	Capitalized 22-23
19	400 kV Dhanansu	40.0	Capitalized 22-23
20	400 kV Doraha	18.34	Capitalized 22-23
23	220 kV Doraha	24.10	Capitalized 22-23
25	220 kV Ikloha	10.83	Capitalized 22-23
26	440 KV Patran	24.21	Capitalized 22-23
29	220 kV Gaunsgarh	20.03	Capitalized 22-23
35	220 kV BOtianwala	8.41	Capitalized 22-23
36	220 kV Majitha	5.45	Capitalized 22-23
44	220 kV Jalandhar -Kartarpur	5.00	Capitalized 22-23
49	400 kV Nakodar	11.55	Capitalized 22-23
51	220 kV Beas	18.27	Capitalized 22-23
57	220 kV Patti	8.68	Capitalized 21-22
59	220 kV Dhandari	6.06	Capitalized 21-22
		8.08	Capitalized 22-23
62	400 kV Rajpura	17.50	Capitalized 20-21
	400 kV Rajpura	24.57	Capitalized 22-23
77	Banga	5.21	Capitalized 22-23
87	Nawanpind	15.74	Capitalized 22-23
93	Transformer	15.0	Capitalized 22-23
95	220 kV Jhoke-H	16.5	
103	220 kV Singhwal	3.56	Capitalized 22-23

107	220 kV Mohali	8.91	Capitalized 22-23
116	220 kV Pakhowal	7.59	Capitalized 21-22
133	220 kV	8.07	Capitalized 21-22
134	220 kV	7.36	Capitalized 22-23
136	220 kV	13.00	Capitalized 22-23
138	220 kV Rajpura Kohara	25.0	Capitalized 22-23
139	220 kV Addl. TFs	37.14	Capitalized 22-23
140	Kot Kapura-1	3.48	Capitalized 22-23
141	132 kV Bilaspur	2.58	Capitalized 22-23
142	132 kV Nawanshahar	2.91	Capitalized 22-23
143	132 kV Kapurthala	5.35	Capitalized 22-23
147	IGC Bathinda	2.46	Capitalized 22-23
153	GT Road Amritsar	16.87	Capitalized 21-22
	GT Road Amritsar	5.99	Capitalized 22-23

11. Format T-20 page 135

At Sr. no. 3 "Number of bays"

The number of 66 kV bays (installed within 220 kV or 400 kV substation of PSTCL) has not been included, whereas the O&M of these bays is done by PSTCL.

12. From T-22, Transmission capacity for 2022-23 Page 139

a) Against Mundra UMPP, capacity allocation to Punjab is shown as 475 MW. However, the actual capacity being supplied is not 475 but some lower figure on account of commercial dispute. The present position for 2022-23 may be obtained and adopted in the column at page 139.

b) In the table given at page 139 (PSTCL petition) the following data may be cross checked/ verified from PSPCL.

Parbati-II NHPL	79.04
Subsnsri NHPC	15.81
SECI Hybrid	800
NTPC Solar	300
SECI Solar	30
SECI Wind	360

13. At Page 166, from T40 the following power transformers failures have been listed.

220 kV Substation	8 Nos.	2020-21
	3 Nos.	2021-22
132 kV Substation	1 No.	2020-21
	4 Nos.	2021-22

The details / particulars of above power transformers which failed may be supplied by PSTCL.