

Subject: RE: Data Gaps in the MUPL Petition No. 1850/2019
Date: Saturday, 25 January 2020 at 3:13:22 PM India Standard Time
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Attachments: image001.jpg, 02 True-up Formats - Distribution_FY2018-19_Annexure-1.xlsx, 03 Loan Sanction Letter_Annexure-2.pdf, 04 Sales as per Form A_Annexure-3.xlsx, 05 Details of FPPPA_Annexure-4.xlsx, 06 Auditor Certificate_Annexure-5.pdf, 07 Scheme wise Breakup_Annexure-6.xlsx, 08 Loan Interest Working for FY 2018-19_Annexure-7.xlsx, 09 Depreciation of Added Asset_Annexure-8.xlsb, 10 Non-Tariff Income_Annexure-9.xlsx, 11 Carrying Cost_Annexure-10.xlsx, 12 Wheeling Charge_Annexure-11.xlsx, 13 Cross Subsidy Charge_Annexure-12.xlsx

Dear Sir,

Please consider our point wise responses as under:

General Issues in the submitted Formats,

- (1) The Forms as desired has been enclosed in **Annexure-1**.
- (2) The Forms has been submitted as per the format specified in the GERC (Multi Year Tariff) Regulations, 2016 as **Annexure-1**.
- (3) Information on following point
 - a. Format 1.1: There is no any commercial losses during FY 2018-19.
 - b. Format 4: The Petitioner has segregated the wire and retail supply business as per allocation matrix stipulated in the Regulation 3.3 of GERC (Multi Year Tariff) Regulations, 2016. The details has been incorporated in **Annexure-1**.
 - c. The format 4.1, 4.2 and 4.3 are incorporated in **Annexure-1**.
 - d. Format 5: The Petitioner has segregated the wire and retail supply business as per allocation matrix stipulated in the Regulation 3.3 of GERC (Multi Year Tariff) Regulations, 2016. The details has been incorporated in **Annexure-1**.
 - e. Format 6: The existing loan was availed from RBL bank as per the terms and conditions mentioned in the attached sanction letter as **Annexure-2**.
 - f. Format 8: The Petitioner has segregated the wire and retail supply business as per allocation matrix stipulated in the Regulation 3.3 of GERC (Multi Year Tariff) Regulations, 2016. The details has been incorporated in **Annexure-1**.
 - g. Format 9: The Petitioner has segregated the wire and retail supply business as per allocation matrix stipulated in the Regulation 3.3 of GERC (Multi Year Tariff) Regulations, 2016. The details has been incorporated in **Annexure-1**.
 - h. Format 12: The detail has been incorporated as per **Annexure-1**.

- i. Format 13: The Petitioner has segregated the wire and retail supply business as per allocation matrix stipulated in the Regulation 3.3 of GERC (Multi Year Tariff) Regulations, 2016. The details has been incorporated in **Annexure-1**.

Specific Queries for True-up,

- (1) The sale of energy as per monthly return under Form A specified in Rule 6 (1) (A) filed with the Chief Electrical Inspector and Collector of Electricity Duty has been enclosed as **Annecure-3**.

- (2) The detail has been incorporated in **Annexure-1**.

- (3) The detail has been enclosed as **Annexure-4**.

The auditor certificate is enclosed as **Annexure-5**.

- (4) The detail of O&M expenses are mentioned in note 25 and note 27 in audited accounts on page no. 103 & 104 of the petition.

- (5) The scheme wise back-up of actual capitalization with opening CWIP and closing CWIP is enclosed as **Annexure-6**.

- (6) The detail of loan with interest calculation is enclosed as **Annexure-7**.

- (7) The interest expenses has been computed as per clause 38.5 of GERC (Multi Year Tariff) Regulations, 2016. The interest rate derived as per **Annexure-7**.

- (8) The Petitioner has deducted amortization of service line contribution of Rs. 1.84 crores which is mentioned in note 22 of audited account on page no. 103 of the petition from depreciation of Rs. 4.74 crore on fixed asset and therefore Petitioner has claimed Rs. 2.90 crore.

The detail computation of the depreciation on the asset added during the year is enclosed as **Annexure-8**

- (9) The Petitioner has calculated average of security deposit available as on March 31, 2018 and March 31, 2019 as mentioned in note 17 of audited account on page no. 101 of the petition.

- (10) The details of the non-tariff income is enclosed as **Annexure-9**. The audited certificate is enclosed as **Annexure – 5** for rebate on prompt payment availed from power procurement.

- (11) The detail computation on carrying cost is enclosed as **Annexure-10**.

- (12) The detail computation on wheeling charge has been enclosed as **Annexure-11**.

- (13) The detail computation of Cross Subsidy charge has been enclosed as **Annexure-12**.

- (14) The gain & sharing computation has been provided with linkages in Form 13 in **Annexure-1**.

Anil Rabadia

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Subject: Data Gaps in the MUPL Petition No. 1850/2019

Respected Sir,

I am directed to forward the below mentioned additional details required from M/s MUPL in the Petition No. 1850/2019 for True up of FY 2018-19 and Determination of Tariff for FY 2020-21. You are requested to submit those details **in soft copy (in MS Excel/PDF) and hard copy within 15 days.**

General Issue in the submitted Formats

1. Petitioner has not submitted formats with linkages and formulae intact. You are requested to submit those in the excel submissions to preserve the linkages and formulae intact .
2. The Petitioner has not submitted the True-up formats as per the format specified in the GERC (Multi Year Tariff) Regulations, 2016. You are requested to submit those.
3. Please provide information as sought in following Formats
 - Format 1.1 –Total Commercial Loss, Total Commercial Loss (as a % of Energy Input)
 - Format 4-Segregation among Wires and Retail Supply Business
 - Format 4.1,4.2 and 4.3- the mentioned forms are missing
 - Format 5- Segregation among Wires and Retail Supply Business
 - Format 6 – Part-B (Complete Details of Existing Loan)
 - Format 8 - Segregation among Wires and Retail Supply Business
 - Format 9 - Segregation among Wires and Retail Supply Business
 - Format 12 - Increase in Proposed ABR wrt Existing ABR (%)
 - Format 13 - Segregation among Wires and Retail Supply Business

Specific queries for True Up

1. **Table 5:**

The petitioner is requested to provide backup of the sales via audited annual accounts/ auditors certificate. Also the petitioner is requested to submit the details furnished in the monthly return under Form A specified in Rule 6 (1) (A) filed by MUPL with the Chief Electrical Inspector and Collector of Electricity Duty.

2. Table 7:

In the table of Energy Requirement , the petitioner is required to submit the detailed backup of Distribution Loss (3.43%) and the corresponding details in Form 1.1

3. Table 8:

The Petitioner is required to submit the following details:

- Detailed backup of source wise power purchase quantum (Mus) and cost (Rs.crores) as mentioned in Form 2 of the formats and the shall be reconciled with quarterly FPPPA reports.

The Petitioner is also requested to clarify/reconcile the power purchase cost as claimed in the petition (145.48 Crore) with that of Audited Accounts (140.25 Crore).

4. Table 10:

Petitioner in its Petition has submitted that the actual O&M Expenses for FY 2018-19 as per the audited accounts as Rs. 8.81 Crore. As regards the same, the Petitioner should submit detailed statement for O & M cost (Employee Cost, Repair & Maintenance and Administrative & General Expenses), reconciling the above O&M cost as claimed in the petition with the cost as per the audited accounts.

5. Table 12:

The Petitioner is requested to submit the details of scheme-wise breakup of actual capitalisation of Rs. 18.86 Crore with details of opening CWIP as on 1 April, 2018 and Closing CWIP as on 31 March, 2019 along with the source of fundings and as per format 4.1, 4.2 and 4.3 of the formats.

6. Para 3.36:

The Petitioner is requested to provide source-wise balance loan as on 01.04.2018 and interest rate applicable on them as on 01.04.2018 and also the detailed computation of Weighted average Rate of Interest as per Form-6 of the formats.

7. Table 16:

The Petitioner is also requested to clarify/reconcile the interest expenses as mentioned in the Petition vis-à-vis the Audited Accounts.

8. Table 15:

As per the audited accounts the depreciation is 4.73 Crore and the Petitioner has claimed the same to be 2.90 Crore. The Petitioner is requested to submit detailed reconciliation of the same with the audited accounts.

Submit the detailed computations of the depreciation on the assets added during the year considering the actual date of capitalization and relevant depreciation rates as per Regulations.

Also please provide details of assets which have already been depreciated by 90% as on 31.03.2019.

Confirm that cumulative depreciation in FY 2018-19 is less than 90% of GFA for all assets, since assets cannot be depreciated beyond 90% of GFA in accordance with the MYT Regulation.

9. Table 18:

The Petitioner is requested to submit the details of Average Security Deposit from Consumers (Rs 2.36 Crore) and reconcile the same with the audited accounts.

10. Table 22:

The Petitioner is requested to submit reconciliation of Non-tariff Income w.r.t the audited accounts. Also the Petitioner is required to submit the details of rebate on prompt payment availed from power procurement. (Rs.2.96 crore)

11. Table 29:

The Petitioner is requested to give detailed Computations of The Carrying Cost of Rs.1.84 Crore with appropriate Excel formulae and linkages.

12. The Petitioner is requested to submit detailed computation of wheeling charges for HT and LT level.

13. The Petitioner is requested to submit the detailed computations of cross-subsidy surcharges.

14. The Petitioner is required to give gains and loss sharing computations in excel with proper links for FY 18-19.

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Thanks and Regards

Santosh Kumar Asipu
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