

**CENTRAL ELECTRICITY REGULATORY COMMISSION
NEW DELHI**

PETITION NO. 35/TT/2015

Coram:

**Shri A. S. Bakshi, Member
Dr. M. K. Iyer, Member**

**Date of Hearing: 23.11.2015
Date of Order : 09.02.2016**

In the Matter of:

Truing up of transmission tariff for 2009-14 tariff block under Central Electricity Regulatory Commission (Terms and Conditions of Tariff) Regulations, 2009 and determination of transmission tariff for 2014-19 tariff block under Central Electricity Regulatory Commission (Terms and Conditions of Tariff) Regulations, 2014 for Transmission System associated with Ramagundam STPP including ICT at Khammam and Reactor at Gazuwaka under CTP Augmentation in Southern Region under Regulation 86 of Central Electricity Regulatory Commission (Conduct of Business) Regulations, 1999

And in the Matter of:

Power Grid Corporation of India Ltd,
SAUDAMINI, Plot No.-2, Sector-29,
Gurgaon-122001 (Haryana)

.....Petitioner

Versus

1. Karnataka Power Transmission Corporation Ltd.,
(KPTCL), Kaveri Bhavan, Bangalore – 560009
2. Transmission Corporation of Andhra Pradesh Ltd.
(APTRANSCO), Vidyut Soudha, Hyderabad- 500082
3. Kerala State Electricity Board, Thiruvananthapuram
Vaidyuthi Bhavanam, Pattom,
Thiruvananthapuram - 695 004
4. Tamil Nadu Generation and Distribution Corporation Ltd
(Formerly Tamilnadu Electricity Board -TNEB)
NPKRR Maaligai, 800, Anna Salai Chennai - 600 002



5. Electricity Department
Govt of Pondicherry, Pondicherry – 605001
6. Eastern Power Distribution Company of Andhra Pradesh Limited (APEPDCL)
P&T Colony, Seethmmadhara Vishakhapatnam,
Andhra Pradesh
7. Southern Power Distribution Company of Andhra Pradesh Limited (APSPDCL)
Srinivasasa Kalyana Mandapam Backside, Tiruchanoor Road,
Kesavayana Gunta, Tirupati-517 501,
Chittoor District, Andhra Pradesh
8. Central Power Distribution Company of Andhra Pradesh limited (APCPDCL)
Corporate Office, Mint Compound,
Hyderabad- 500 063, Andhra Pradesh
9. Northern Power Distribution Company of Andhra Pradesh Limited (APNPDCL)
Opp. NIT Petrol Pump Chaitanyapuri, Kazipet,
Warangal - 506 004 Andhra Pradesh
10. Bangalore Electricity Supply Company Ltd.,(BESCOM),
Corporate Office, K.R.Circle Bangalore - 560 001 Karnataka
11. Gulbarga Electricity Supply Company Ltd., (GESCOM)
Station Main Road, Gulbarga, Karnataka
12. Hubli Electricity Supply Company Ltd., (HESCOM)
Navanagar, PI3 Road Hubli, Karnataka
13. MESCOM Corporate Office,
Paradigm Plaza, AB Shetty Circle
Mangalore - 575 001, Karnataka
14. Chamundeswari Electricity Supply Corporation Ltd., (CESC)
927,L J Avenue Ground Floor,
New Kantharaj Urs Road Saraswatipuram,
Mysore – 570009, Karnataka
15. Electricity Department, Government of Goa,
Vidyut Bhawan, Panaji,
Near Mandvi Hotel,
Goa - 403 001

.....Respondent(s)

The following were present:

For Petitioner: Shri S.K. Niranjan, PGCIL
Shri S.S. Raju, PGCIL
Shri Jasbir Singh, PGCIL



Shri Anshul Garg, PGCIL
Shri Rakesh Prasad, PGCIL
Shri M.M. Mondal, PGCIL
Shri S.K Venkatesan, PGCIL
Shri Shashi Bhushan, PGCIL
Shri J. Mazumder, PGCIL

For Respondents: Shri S. Vallinayagam, Advocate, TANGEDCO

ORDER

The petition has been preferred by Power Grid Corporation of India Limited (hereinafter referred to as “the petitioner”), for revision of tariff under Regulation 6 of the Central Electricity Regulatory Commission (Terms and Conditions of Tariff) Regulations, 2009 (hereinafter referred to as “the 2009 Tariff Regulations”) based on trueing up of capital expenditure for the period 1.4.2009 to 31.3.2014 and for determination of tariff under Central Electricity Regulatory Commission (Terms and Conditions of Tariff) Regulations, 2014 (hereinafter referred to as “the 2014 Tariff Regulations”) for the period from 1.4.2014 to 31.3.2019 in respect of Transmission System associated with Ramagundam STPP including ICT at Khammam and Reactor at Gazuwaka under CTP Augmentation in Southern Region (hereinafter referred to as “the transmission asset”).

2. The respondents are distribution licensees, who are procuring transmission service from the petitioner, mainly beneficiaries of Southern Region.

3. The brief facts of the case are as follows:-

a) The petitioner has been entrusted with the implementation of transmission system associated with Ramagundam STPP including ICT at Khammam and Reactor at Gazuwaka under CTP augmentation in Southern Region. The revised cost estimates for the transmission system were approved by the Central



Government in Ministry of Power vide letter dated 27.11.1990 at a total cost of ₹198512 lakh, including ₹167462 lakh for Ramagundam Super Thermal Power Station and ₹31050 lakh for the associated transmission system. Further, the approval for additional assets under augmentation of Central Transmission Project in Southern Region was accorded by the Board of Directors of the petitioner company under its delegated powers vide Memorandum No. C/CP/SQ2-00 dated 12.5.1994 for ₹3857 lakh which, inter alia, included implementation of 1 No. 315 MVA, 400/220 kV Transformer at Khammam and one No. 50 MVAR Reactor at Gazuwaka. The apportioned approved cost of ICT at Khammam and Reactor at Gazuwaka was stated to be ₹2012 lakh. The total approved cost of the transmission system is ₹33062 lakh.

b) The Commission vide its order dated 18.2.2014 in Petition No. 298/2010 had approved the capital cost of ₹38375.41 lakh as on 31.3.2009. In addition to the above, the Commission had also allowed estimated additional capital expenditure and de-capitalization amounting to ₹ 8587.60 lakh and ₹ 842.46 lakh respectively for transmission tower strengthening and replacement of sub-station equipments, as shown below:-

(₹ in lakh)

Capital cost as admitted on 31.9.2009	Additional capital expenditure/De-capitalisation approved in order dated 18.2.2014						Capital cost as on 31.3.2014
	2009-10	2010-11	2011-12	2012-13	2013-14	Total	
38375.41	0.00	1016.60	3716.77	2290.48	1563.75	8587.60	46963.01
	0.00	-268.48	-278.57	-157.98	-137.43	-842.46	-842.46
38375.41	0.00	748.12	3438.20	2132.50	1426.32	7745.14	46120.55

c) The Commission determined the tariff for 2009-14 tariff period, based on the above capital cost and estimated additional capital expenditure for the transmission asset during 2009-14 as given below:-

(₹ in lakh)

Particulars	2009-10	2010-11	2011-12	2012-13	2013-14
Depreciation	619.37	649.98	857.14	1157.32	1371.32
Interest on Loan	0.00	0.00	66.80	148.29	162.85
Return on Equity	3077.14	3096.76	3206.53	3352.60	3445.92
Interest on Working Capital	186.67	193.94	208.61	226.62	240.71
O & M Expenses	2191.52	2316.03	2449.31	2589.62	2737.21
Total	6074.70	6256.71	6788.38	7474.46	7958.01

4. As per Regulation 6 of the 2009 Tariff Regulations, the Commission shall carry out truing up exercise along with the tariff petition filed for the next tariff period, with respect to the capital expenditure including additional capital expenditure incurred up to 31.3.2014, as admitted by the Commission after prudence check at the time of truing up. Further, as per Regulation 15 of the 2009 Tariff Regulations, the petitioner is required to adjust the yearly impact of MAT rate in the truing up petition for 2009-14 tariff period.

5. The petitioner has filed the instant petition on 29.12.2014 for revision of tariff for the tariff period 2009-14 in accordance with Regulation 6 of the 2009 Tariff Regulations.

6. The petitioner has served the petition to the respondents and notice of this application has been published in the newspaper in accordance with Section 64 of the Electricity Act 2003. No comments/objections have been received from the public in response to the notice in newspaper. No submissions have been made by the respondents. The Commission had directed the petitioner, vide letter dated 16.11.2015,

to reconcile the actual additional capital expenditure and de-capitalisation amount with respect to the approved expenditure depicting the items that have been dropped from the revised proposal of additional capital expenditure and justification for new expenditure proposed in respect of the circuit breaker at Bangalore.

7. The hearing in this matter was held on 23.11.2015. During the hearing, the Commission had directed the petitioner to submit the details of de-capitalisation claimed in the petition and response to the letter dated 16.11.2015. In response, the petitioner has submitted replies vide affidavit dated 8.12.2015 and 21.1.2016. The petitioner has also submitted the revised tariff forms vide its submission dated 21.1.2016. Having heard the representatives of the petitioner and perused the material on record, we proceed to dispose of the petition.

TRUING UP OF ANNUAL FIXED CHARGES FOR 2009-14 TARIFF PERIOD

8. Clause (3) of the Regulation 6 of the 2009 Tariff Regulations provides as under:-

“(3) The generating company or the transmission licensee, as the case may be, shall submit for the purpose of truing up, details of capital expenditure and additional capital expenditure incurred for the period from 1.4.2009 to 31.3.2014, duly audited and certified by the auditors”.

9. The petitioner has submitted the information as required under the 2009 Tariff Regulations for truing up of annual fixed charges for 2009-14 tariff period. The tariff for 2009-14 tariff period has been trued up in the subsequent paragraphs.

Capital Cost

10. The petitioner has claimed admitted capital cost of ₹38375.41 lakh as on 31.3.2009 for the purpose of tariff determination.



11. The last proviso to Regulation 7(2) of the 2009 Tariff Regulations provides that:-

“Provided also that in case of the existing projects, the capital cost admitted by the Commission prior to 1.4.2009 duly trued up by excluding un-discharged liability, if any, as on 1.4.2009 and the additional capital expenditure projected to be incurred for the respective year of the tariff period 2009-14, as may be admitted by the Commission, shall form the basis for determination of tariff”.

12. The capital cost of ₹38375.41 lakh admitted by the Commission as on 31.3.2009 has been considered as opening capital cost as on 1.4.2009 for truing up of tariff in accordance with Regulation 7 of the 2009 Tariff Regulations.

Additional Capital Expenditure

13. Regulation 6(1) of the 2009 Regulations provides that:-

“The Commission shall carry out truing up exercise along with the tariff petition filed for the next tariff period, with respect to the capital expenditure including additional capital expenditure incurred up to 31.3.2014”

14. The petitioner has submitted that it has incurred the additional capital expenditure and de-capitalization towards tower strengthening works and replacement of equipments as depicted below:-

Particulars	Year	Additional capital expenditure		De-capitalisation		Total Net Additional capital expenditure
		S/S Equipments	Tower Strengthening	S/S Equipments	Tower Strengthening	
Approved vide order dated 18.2.2014	2009-10	0.00	0.00	0.00	0.00	0.00
Claimed in the present petition		733.53	14.93	-123.12	0.00	625.34
Approved vide order dated 18.2.2014	2010-11	1016.60	0.00	-268.48	0.00	748.12
Claimed in the present petition		462.33	3.45	-80.73	0.00	385.05
Approved vide order dated 18.2.2014	2011-12	2197.43	1519.34	-278.57	0.00	3438.20
Claimed in the present petition		419.65	0.00	-123.55	0.00	296.10
Approved vide	2012-13	1446.82	843.66	-157.98	0.00	2132.50

(₹ in lakh)



Particulars	Year	Additional capital expenditure		De-capitalisation		Total Net Additional capital expenditure
		S/S Equipments	Tower Strengthening	S/S Equipments	Tower Strengthening	
order dated 18.2.2014						
Claimed in the present petition		340.45	70.74	-96.23	0.00	314.96
Approved vide order dated 18.2.2014	2013-14	1550.82	12.93	-137.43	0.00	1426.32
Claimed in the present petition		150.55	125.41	-26.00	0.00	249.96
Total Approved vide order dated 18.2.2014		6211.67	2375.93	-842.46	0.00	7745.14
Total claimed in the present petition		2106.51	214.53	-449.63	0.00	1871.41

15. The Commission, vide order dated 18.2.2014, had allowed the additional capital expenditure broadly on the following grounds: -

- a. Procurement of 400/220 kV 315 MVA, ICT- I at Hyderabad
- b. Procurement of one no. 400/220 kV, 315 MVA, transformer and 01 no. 167 MVA, 400/220 kV ICT at Bangalore
- c. Procurement of three nos. spare reactors for Ramagundam-Nagarjunasagar transmission line, Nagarjunasagar –Cuddapah- I and Ramagundam –Hyderabad-I line and Cuddapah –Bangalore line
- d. Replacement of various sub-station equipments at Hyderabad sub-station
- e. Tower strengthening of various lines in Southern Region under Ramagundam Transmission System

16. The petitioner has submitted, vide affidavit dated 29.12.2014, the justification for delay in carrying out the tower strengthening activities of different lines and replacement of sub-station equipments approved by the Commission vide order dated 18.2.2014.

The reasons submitted by the petitioner are as hereunder:-

- a. Tower strengthening activities for majority of lines were taken up at the site only once the approval was received from the Commission, vide order dated 18.2.2014. Based on the criticality of the lines, where earlier occurrence of failure was located, strengthening activities were taken up for the 400 kV S/C Hyderabad-Nagarjunsagar line and the 400 kV S/C Nagarjunsagar-Raichur line during the period 2009-14. Remaining activities have been rescheduled as per the submission made to the Commission.
- b. Replacement of sub-station equipments was taken on priority basis depending on the criticality of the health of equipment. The balance activities in this regard have been rescheduled as per the submission made to the Commission.

17. In response to query of the Commission regarding the items and activities which have been dropped from the revised schedule submitted with the petition, the petitioner has submitted, vide affidavit dated 8.12.2015, the reasons for dropping certain items from the schedule, which are as below:-

- a. Single phase transformer unit: This has been removed from the revised proposal based on the minutes of 22nd SRPC meeting dated 18.5.2013 that the existing transformer will be replaced with a new one.
- b. Fire fighting system of Sriperumbudur and Salem Sub-station: This is part of complete fire fighting system at Sriperumbudur and Salem Sub-stations. Since replacement of the said work was approved under NLC Stage-I vide order dated 15.3.2011, therefore this item has been dropped from the proposal.

18. In response to query of the Commission regarding the mismatch between the de-capitalization values as submitted in the Auditor's certificate dated 27.7.2014 and the de-capitalization values as submitted vide affidavit dated 8.12.2014 during 2009-14 and 2014-19, the petitioner, vide affidavit dated 21.1.2016, has submitted the reasons. The petitioner submits that the details of the actual add cap and de-cap during 2009-14 is as per the books of accounts and the same has already been submitted vide Auditor Certificate. The accounting entry for de-cap pertaining to additional capitalization for 2009-10 and 2010-11 was passed in the account of 2010-11. Similarly, accounting entry for de-cap for 2011-12 was not provided in the same year in 2011-12. Thus, the add cap and de cap during 2009-14 as per auditor certificate is ₹2321.04 lakh and ₹309.95 lakh respectively, however the actual additional capital expenditure of ₹2321.04 lakh and de-capitalisation of ₹449.63 lakh has been proposed for tariff determination purpose. The petitioner further submits that the accounting entry for difference in the year wise de-cap figures between auditor certificate and the affidavit will be passed during the current year accounts (2015-16) w.e.f. the relevant year.

19. We have considered the submissions of the petitioner with regard to the actual capital expenditure during 2009-14 tariff period. The revised schedule of completion of the approved activities has also been perused. Since the additional capital expenditure of ₹2321.04 lakh and de-capitalisation of ₹449.63 lakh during 2009-14 tariff period is based on the actual expenditure incurred as per the affidavit dated 21.1.2016, and is within the scope of work as approved by the Commission in its order dated 18.2.2014 in Petition No. 298/2010, the same is allowed for the purpose of revision of tariff in accordance with Regulation 6 of the 2009 Tariff Regulations.

Debt: Equity

18. Regulation 12 of the 2009 Tariff Regulations provides as under:-

“12. Debt-Equity Ratio. (1) For a project declared under commercial operation on or after 1.4.2009, if the equity actually deployed is more than 30% of the capital cost, equity in excess of 30% shall be treated as normative loan:

Provided that where equity actually deployed is less than 30% of the capital cost, the actual equity shall be considered for determination of tariff:

(2) In case of the generating station and the transmission system declared under commercial operation prior to 1.4.2009, debt-equity ratio allowed by the Commission for determination of tariff for the period ending 31.3.2009 shall be considered.

(3) Any expenditure incurred or projected to be incurred on or after 1.4.2009 as may be admitted by the Commission as additional capital expenditure for determination of tariff, and renovation and modernisation expenditure for life extension shall be serviced in the manner specified in clause (1) of this regulation.”

19. In response to query of the Commission regarding actual equity infusion during 2009-14 period, the petitioner has submitted, vide affidavit dated 8.12.2015 that, no loan has been deployed for funding additional capital expenditure during 2009-14. The entire expenditure has been funded through equity. However, in accordance with Regulation 12 of the 2009 Tariff Regulations, the excess equity over 30% has been treated as deemed loan for tariff computation purpose. Thus, the debt:equity ratio of 70:30 for additional capital expenditure as claimed by the petitioner is in accordance with the Regulation 12 (3) of the 2009 Tariff Regulations and hence, same has been considered towards financing of the additional capital expenditure.

20. The debt:equity ratio of 54.13:45.87 admitted by the Commission vide order dated 18.2.2014 in Petition No. 298/2010 as on 31.3.2009 has been considered as on 1.4.2009 for determination of tariff in accordance with the Regulation 12 of the 2009 Tariff Regulations. In respect of the additional capitalization, debt: equity ratio of 70:30 has been considered in line with the 2009 Tariff Regulations.

21. The details of the debt: equity considered for the purpose of tariff for 2009-14 tariff period is as follows:-

(₹ in lakh)

Funding	Capital cost as on 31.3.2009	(%)	Additional capital expenditure during 2009-14	(%)	Total Cost as on 31.3.2014	(%)
Debt	20772.64	54.13	1309.99	70.00	22082.63	54.87
Equity	17602.77	45.87	561.42	30.00	18164.19	45.13
Total	38375.41	100.00	1871.41	100.00	40246.82	100.00

Return on Equity (“ROE”)

22. Clause (3), (4) and (5) of the Regulation 15 of the 2009 Tariff Regulations provide that,

“(3) The rate of return on equity shall be computed by grossing up the base rate with the Minimum Alternate/Corporate Income Tax Rate for the year 2008-09, as per the Income Tax Act, 1961, as applicable to the concerned generating company or the transmission licensee, as the case may be.

(4) Rate of return on equity shall be rounded off to three decimal points and be computed as per the formula given below:

Rate of pre-tax return on equity = Base rate / (1-t)

Where “t” is the applicable tax rate in accordance with clause (3) of this regulation.

(5) The generating company or the transmission licensee, as the case may be, shall recover the shortfall or refund the excess Annual Fixed Charge on account of Return on Equity due to change in applicable Minimum Alternate/Corporate Income Tax Rate as per the Income Tax Act, 1961 (as amended from time to time) of the respective financial year directly without making any application before the Commission:

Provided further that Annual Fixed Charge with respect to the tax rate applicable to the generating company or the transmission licensee, as the case may be, in line with the provisions of the relevant Finance Acts of the respective year during the tariff period shall be trued up in accordance with Regulation 6 of these regulations.”

23. The variation in the tax rate during the 2009-14 tariff period applicable to the petitioner as per the Finance Act of the relevant year for the purpose of grossing up of return on equity (ROE) has been furnished as follows:-

Year	MAT Rate claimed in the current petition	Grossed up Rate of Return (Base Rate/(1-t))
2009-10	16.995%	18.674%
2010-11	19.931%	19.358%
2011-12	20.008%	19.377%
2012-13	20.008%	19.377%
2013-14	20.961%	19.610%

24. The petitioner has claimed the additional capital expenditure in the debt:equity ratio of 70:30, which is in line with Regulation 12 of the 2009 Tariff Regulations.

25. The ROE as trued up and allowed is as follows:-

Return on Equity	(₹ in lakh)				
	2009-10	2010-11	2011-12	2012-13	2013-14
Approved in order dated 18.2.2014	3077.14	3096.76	3206.53	3352.60	3445.92
Claimed by the petitioner	3304.66	3455.04	3478.23	3495.99	3554.65
Allowed after trued up in this order	3304.58	3455.10	3478.22	3495.98	3554.73

The difference in the approved ROE and that allowed after truing up is on account of actual grossed up ROE based on actual MAT rate.

Interest on Loan (IoL)

26. Regulation 16 of the 2009 Tariff Regulations provide the methodology for working out weighted average rate of IoL. The Commission in its earlier order dated 8.6.2011 in Petition No. 238/2010 has dealt with similar issue and held that:-

“...in case of floating rate of interest, any change in the rates of interest during the tariff period will be considered at the time of true up”.

27. In the instant petition the petitioner has not claimed normative IoL for the 2009-14 tariff period. The loan amount due to the additional capital expenditure during 2009-14

tariff period is getting repaid by the depreciation during the period. Hence the no IoL has been allowed during the 2009-14 tariff period.

(₹ in lakh)

Interest on Loan	2009-10	2010-11	2011-12	2012-13	2013-14
Approved in order dated 18.2.2014	0.00	0.00	66.80	148.29	162.85
Claimed by the petitioner	0.00	0.00	0.00	0.00	0.00
Allowed after trued up in this order	0.00	0.00	0.00	0.00	0.00

Depreciation

28. The depreciation has been worked out as per the methodology provided in the Regulation 17 of the 2009 Tariff Regulations. The depreciation allowed is as follows:-

(₹ in lakh)

Depreciation	2009-10	2010-11	2011-12	2012-13	2013-14
Approved in order dated 18.2.2014	619.37	649.98	857.14	1157.32	1371.32
Claimed by the petitioner	650.01	696.53	736.03	774.33	808.52
Allowed after trued up in this order	650.00	696.53	736.03	774.34	808.51

The difference in the approved depreciation and that allowed after truing up is on account of change gross block during the 2009-14 tariff period.

Operation & Maintenance Expenses (O&M Expenses)

29. Clause (g) of Regulation 19 of the 2009 Tariff Regulations specifies the norms for O&M Expenses for the transmission system. The normative O&M Expenses are not required to be trued up. Accordingly, the total allowable O&M expenses for the instant assets have been worked out based on norms of O&M Expenses and the details are as follows:-

(₹ in lakh)

O&M Expenses	2009-10	2010-11	2011-12	2012-13	2013-14
Approved in order dated 18.2.2014	2191.52	2316.03	2449.31	2589.62	2737.21
Claimed by the petitioner	2191.52	2316.03	2449.31	2589.62	2737.21
Allowed after trued up in this order	2191.52	2316.03	2449.31	2589.62	2737.21

Interest on Working Capital (IWC)

30. The IWC has been worked out as per the methodology provided in the Regulation 18 of the 2009 Tariff Regulations and allowed as under:-

(₹ in lakh)

Interest on Working Capital	2009-10	2010-11	2011-12	2012-13	2013-14
Approved in order dated 18.2.2014	186.67	193.94	208.61	226.62	240.71
Claimed by the petitioner	192.05	202.38	210.35	218.54	227.86
Allowed after trued up in this order	192.04	202.38	210.35	218.54	227.86

The difference in the approved IWC and that allowed after truing up is on account of change in the receivables during the 2009-14 tariff period.

APPROVED ANNUAL FIXED CHARGES FOR 2009-14 TARIFF PERIOD

31. The detailed computation of the various components of the trued up annual fixed charges for the instant transmission assets for the tariff period 2009-14 is summarised below:-

(₹ in lakh)

Particulars	2009-10	2010-11	2011-12	2012-13	2013-14
Depreciation					
Opening Gross Block	38375.41	39000.75	39385.80	39681.90	39996.86
Additional Capitalisation	625.34	385.05	296.10	314.96	249.96
Closing Gross Block	39000.75	39385.80	39681.90	39996.86	40246.82
Average Gross Block	38688.08	39193.28	39533.85	39839.38	40121.84
Rate of Depreciation	1.68	1.78	1.86	1.94	2.02



Particulars	2009-10	2010-11	2011-12	2012-13	2013-14
Depreciable Value	34553.15	35007.83	35314.34	35589.32	35843.54
Balance Useful life of the asset	12	11	10	9	8
Elapsed Life	18	19	20	21	22
Remaining Depreciable Value	7800.01	7661.87	7360.25	6969.04	6468.10
Depreciation during the year	650.00	696.53	736.03	774.34	808.51
Cumulative depreciation	27403.14	28042.49	28690.12	29394.62	30183.95
Interest on Loan					
Gross Normative Loan	20772.64	21210.38	21479.91	21687.18	21907.66
Cumulative Repayment upto Previous Year	20772.64	21210.38	21479.91	21687.18	21907.66
Net Loan-Opening	0.00	0.00	0.00	0.00	0.00
Additions	437.74	269.54	207.27	220.47	174.97
Repayment during the year	437.74	269.54	207.27	220.47	174.97
Net Loan-Closing	0.00	0.00	0.00	0.00	0.00
Average Loan	0.00	0.00	0.00	0.00	0.00
Weighted Average Rate of Interest on Loan (%)	0.00	0.00	0.00	0.00	0.00
Interest on Loan	0.00	0.00	0.00	0.00	0.00
Return on Equity					
Opening Equity	17602.77	17790.37	17905.89	17994.72	18089.21
Additions	187.60	115.52	88.83	94.49	74.99
Closing Equity	17790.37	17905.89	17994.72	18089.21	18164.19
Average Equity	17696.57	17848.13	17950.30	18041.96	18126.70
Return on Equity (Base Rate)	15.500	15.500	15.500	15.500	15.500
MAT rate for the respective year	16.995	19.931	20.008	20.008	20.961
Rate of Return on Equity	18.674	19.358	19.377	19.377	19.610
Return on Equity	3304.58	3455.10	3478.22	3495.98	3554.73
Interest on Working Capital					
O & M expenses	182.63	193.00	204.11	215.80	228.10
Maintenance Spares	328.73	347.40	367.40	388.44	410.58
Receivables	1056.36	1111.67	1145.65	1179.75	1221.38
Total	1567.71	1652.08	1717.16	1783.99	1860.06
Rate of Interest(%)	12.25	12.25	12.25	12.25	12.25
Interest	192.04	202.38	210.35	218.54	227.86
Annual Transmission Charges					
Depreciation	650.00	696.53	736.03	774.34	808.51
Interest on Loan	0.00	0.00	0.00	0.00	0.00
Return on Equity	3304.58	3455.10	3478.22	3495.98	3554.73



Particulars	2009-10	2010-11	2011-12	2012-13	2013-14
Interest on Working Capital	192.04	202.38	210.35	218.54	227.86
O & M Expenses	2191.52	2316.03	2449.31	2589.62	2737.21
Total	6338.15	6670.04	6873.90	7078.47	7328.30

DETERMINATION OF ANNUAL FIXED CHARGES FOR 2014-19 TARIFF PERIOD

32. The petitioner has claimed the tariff charges for 2014-19 tariff period as under:-

(₹ in lakh)

Particulars	2014-15	2015-16	2016-17	2017-18	2018-19
Depreciation	835.69	1085.79	1333.83	1338.16	1811.39
Interest on Loan	0.00	34.22	30.43	0.00	16.68
Return on Equity	3565.08	3648.02	3729.00	3730.13	3822.94
Interest on Working Capital	239.52	252.63	264.88	269.17	287.66
O & M Expenses	2502.14	2586.47	2672.56	2760.66	2852.52
Total	7142.43	7607.13	8030.70	8098.12	8791.19

34. The details submitted by the petitioner in support of its claim for interest on working capital are given hereunder:-

(₹ in lakh)

Particulars	2014-15	2015-16	2016-17	2017-18	2018-19
O & M Expenses	208.51	215.54	222.71	230.06	237.71
Maintenance Spares	375.32	387.97	400.88	414.10	427.88
Receivables	1190.41	1267.86	1338.45	1349.69	1465.20
Total	1774.24	1871.37	1962.04	1993.85	2130.79
Rate of Interest (%)	13.50	13.50	13.50	13.50	13.50
Interest	239.52	252.63	264.88	269.17	287.66

Capital Cost

35. Clause (3) and (6) of Regulation 9 of 2014 Tariff Regulation provide as follows:-

“(3) The Capital cost of an existing project shall include the following:

- (a) the capital cost admitted by the Commission prior to 1.4.2014 duly trued up by excluding liability, if any, as on 1.4.2014;
- (b) additional capitalization and de-capitalization for the respective year of tariff as determined in accordance with Regulation 14; and
- (c) expenditure on account of renovation and modernisation as admitted by this Commission in accordance with Regulation 15.”

“(6) The following shall be excluded or removed from the capital cost of the existing and new project:

(a) The assets forming part of the project, but not in use; (b) Decapitalisation of Asset;”

36. The capital cost of ₹40246.82 lakh worked out by the Commission as on 31.3.2014 has been considered as opening capital cost as on 1.4.2014 for determination of tariff in accordance with Regulation 9 of the 2014 Tariff Regulations.

Additional Capital Expenditure

37. Clause (1) of Regulation 14 of the 2014 Tariff Regulations provides as under:-

“(1) The capital expenditure in respect of the new project or an existing project incurred or projected to be incurred, on the following counts within the original scope of work, after the date of commercial operation and up to the cut-off date may be admitted by the Commission, subject to prudence check:

- (i) Undischarged liabilities recognized to be payable at a future date;
- (ii) Works deferred for execution;
- (iii) Procurement of initial capital spares within the original scope of work, in accordance with the provisions of Regulation;
- (iv) Liabilities to meet award of arbitration or for compliance of the order or decree of a court of law; and
- (v) Change in law or compliance of any existing law:”

38. Clause 13 of Regulation 3 of the 2014 Tariff Regulations defines as follows:-

“Cut - off Date” means 31st March of the year closing after two years of the year of commercial operation of whole or part of the project, and in case the whole or part of the project is declared under commercial operation in the last quarter of a year, the cut - off date shall be 31st March of the year closing after three years of the year of commercial operation.”

39. The petitioner has claimed additional capital expenditure of ₹6356.79 lakh and de-capitalisation of ₹343.84 lakh during 2014-19 tariff period on account of the balance activities to be carried out as per the revised schedule submitted vide affidavit dated 8.12.2015.

40. In addition to the original set of activities approved by the Commission vide order dated 18.2.2014, the petitioner has also claimed additional capital expenditure towards replacement of 2 nos. 400 kV BHEL make circuit breakers during 2015-16.

41. In response to query of the Commission, the petitioner has submitted, vide affidavit dated 8.12.2015, the cost benefit analysis for replacement of the problematic circuit breaker. Further, the petitioner has submitted that due to obsolete technology of the breaker, the cost of spares is high as well as the lead time of procurement is also too long. The petitioner has submitted the following major reasons to justify the replacement of the breaker at the Bangalaoe Sub-station:-

- a. The breaker is of 3AT3 type and is in service for more than 25 years.
- b. The SF6 gas consumption of this type of breaker is more as compared to the new type of circuit breakers. The gas leakage is a source of major hazard and causes difficulty in maintenance.
- c. The frequent failure of auxiliary switches is a concern for operation and safety of the persons.
- d. Mal operation of hydraulic pressure switches leads to unwarranted tripping of the breaker.

42. The Commission has considered the submissions of the petitioner. It is also observed from the cost-benefit analysis of the petitioner that the total cost of replacement of the breaker comes to ₹32.43 lakh against the maintenance cost of ₹29.50 lakh. The petitioner has submitted the history of failures of the instant breaker vide affidavit dated 29.12.2014. Having perused the above facts and submissions, the Commission is convinced about the requirement of replacement of the 400 kV BHEL make circuit breaker at the Bangalore Sub-station. The petitioner has also submitted

the Management Certificate dated 31.12.2015 certifying the estimated expenditure during 2014-19 tariff period. The details of the projected additional capital expenditure and de-capitalization during 2014-19 tariff period are depicted below:-

(₹ in lakh)

Year	Additional capital expenditure		De-capitalisation		Total Net Additional capital expenditure
	Sub-station Equipments	Tower Strengthening	Sub-station Equipments	Tower Strengthening	
2014-15	145.38	0.00	-40.68	0.00	104.70
2015-16	1746.39	1270.00	-301.45	0.00	2714.94
2016-17	40.00	0.00	-1.71	0.00	38.29
2017-18	3155.02	0.00	0.00	0.00	3155.02
2018-19	0.00	0.00	0.00	0.00	0.00
Total	5086.79	1270.00	-343.84	0.00	6012.95

43. Since the net additional capital expenditure is almost the same as approved by the Commission vide order dated 18.2.2014 in Petition No. 298/2010 and is within the approved scope of work, the same is allowed, subject to true-up on actual basis.

Debt: Equity

44. Clause (1) and (3) of Regulation 19 of the 2014 Tariff Regulations provide as under:-

“19. Debt-Equity Ratio: (1) For a project declared under commercial operation on or after 1.4.2014, the debt-equity ratio would be considered as 70:30 as on COD. If the equity actually deployed is more than 30% of the capital cost, equity in excess of 30% shall be treated as normative loan:”

“(3) In case of the generating station and the transmission system including communication system declared under commercial operation prior to 1.4.2014, debt equity ratio allowed by the Commission for determination of tariff for the period ending 31.3.2014 shall be considered.”

“(5) Any expenditure incurred or projected to be incurred on or after 1.4.2014 as may be admitted by the Commission as additional capital expenditure for determination of tariff, and renovation and modernisation expenditure for life extension shall be serviced in the manner specified in clause (1) of this regulation.”

45. The petitioner has considered the debt:equity ratio of 54.87:45.13 as on 31.3.2014, which is in line with the 2014 Tariff Regulations.

46. In response to query of the Commission regarding actual equity infusion during 2014-19 tariff period, the petitioner has submitted, vide affidavit dated 8.12.2015 that no loan has been proposed to be deployed for funding additional capital expenditure during 2014-19. However, in accordance with the 2014 Tariff Regulations, the excess equity over 30% has been treated as deemed loan for tariff computation purpose. This, in respect of the additional capital expenditure, debt:equity ratio of 70:30 has been adopted as mandated by clause (5) read with clause (1) of Regulation 19 of the 2014 Tariff Regulations. The details of the debt:equity considered for the purpose of tariff for 2014-19 tariff period is as follows:-

(₹ in lakh)

Funding	Capital cost as on 31.3.2014	(%)	Additional capital expenditure during 2014-19	(%)	Total Cost as on 31.3.2019	(%)
Debt	18164.19	54.87	1803.89	70.00	26291.69	56.83
Equity	22082.63	45.13	4209.07	30.00	19968.08	43.17
Total	40246.82	100.00	6012.95	100.00	46259.77	100.00

Return on Equity (ROE)

47. Clause (1) and (2) of Regulations 24 and Clause (2) of Regulation 25 of the 2014 Tariff Regulations specify as under:-

“24. Return on Equity: (1) Return on equity shall be computed in rupee terms, on the equity base determined in accordance with regulation 19.
(2) Return on equity shall be computed at the base rate of 15.50% for thermal generating stations, transmission system including communication system”

“25. Tax on Return on Equity:
(2) Rate of return on equity shall be rounded off to three decimal places and shall be computed as per the formula given below:
Rate of pre-tax return on equity = Base rate / (1-t)



Where “t” is the effective tax rate in accordance with Clause (1) of this regulation and shall be calculated at the beginning of every financial year based on the estimated profit and tax to be paid estimated in line with the provisions of the relevant Finance Act applicable for that financial year to the company on pro-rata basis by excluding the income of non-generation or non-transmission business, as the case may be, and the corresponding tax thereon. In case of generating company or transmission licensee paying Minimum Alternate Tax (MAT), “t” shall be considered as MAT rate including surcharge and cess.”

48. The petitioner has submitted that MAT rate is applicable to the petitioner's company. Accordingly, the MAT rate applicable during the 2013-14 has been considered for the purpose of ROE, which shall be trued up with actual tax rate in accordance with Clause (3) of Regulation 25 of the 2014 Tariff Regulations. The ROE has been worked out and allowed as follows:-

(₹ in lakh)

Return on Equity	2014-15	2015-16	2016-17	2017-18	2018-19
Opening Equity	18164.19	18195.60	19010.09	19021.57	19021.57
Additions	31.41	814.48	11.49	0.00	946.51
Closing Equity	18195.60	19010.09	19021.57	19021.57	19968.08
Average Equity	18179.90	18602.84	19015.83	19021.57	19494.83
Return on Equity (Base Rate)(%)	15.500	15.500	15.500	15.500	15.500
MAT Rate for respective year (%)	20.961	20.961	20.961	20.961	20.961
Rate of Return on Equity (%)	19.610	19.610	19.610	19.610	19.610
Return on Equity	3565.16	3648.10	3729.09	3730.22	3823.02

Interest on Loan (IoL)

49. Clause 5 and Clause 6 of Regulation 26 of the 2014 Tariff Regulations provides that:-

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

Provided that if there is no actual loan for a particular year but normative loan is still outstanding, the last available weighted average rate of interest shall be considered:

Provided further that if the generating station or the transmission system, as the case may be, does not have actual loan, then the weighted average rate of interest of the generating company or the transmission licensee as a whole shall be considered.

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

50. As per the revised submission made by the petitioner vide affidavit dated 21.1.2016, the petitioner has claimed IoL during 2014-19 period at an interest rate of 8.40%. The petitioner has submitted the documentary evidence of bond (L-50 series) for considering the interest rate of 8.40% for 2014-19 period. The Commission has considered the submission of the petitioner. The IoL worked out is as follows:-

(₹ in lakh)					
Interest on Loan	2014-15	2015-16	2016-17	2017-18	2018-19
Gross Normative Loan	22082.63	22155.92	24056.38	24083.18	24083.18
Cumulative Repayment upto Previous Year	22082.63	22155.92	23241.71	24083.18	24083.18
Net Loan-Opening	0.00	0.00	814.67	0.00	0.00
Additions	73.29	1900.46	26.80	0.00	2208.51
Repayment during the year	73.29	1085.79	841.47	0.00	1811.40
Net Loan-Closing	0.00	814.67	0.00	0.00	397.11
Average Loan	0.00	407.33	407.33	0.00	198.56
Weighted Average Rate of Interest on Loan	0.0000	8.4000	8.4000	8.4000	8.4000
Interest	-	34.22	34.22	-	16.68

51. The petitioner has prayed that the change in interest rate due to floating rate of interest applicable, if any, during 2014-19 tariff period will be adjusted. Accordingly, the floating rate of interest, if any, shall be considered at the time of true up or next revision of tariff. The details of weighted average rate of interest for 2014-19 tariff period in respect of the transmission asset is placed at Annexure 2.

Depreciation

52. Clause (2), (5) and (6) of Regulation 27 of the 2014 Tariff Regulations provide that:-

"27. Depreciation:

...(2) The value base for the purpose of depreciation shall be the capital cost of the asset admitted by the Commission. In case of multiple units of a generating station or multiple elements of transmission system, weighted average life for the generating station of the transmission system shall be applied. Depreciation shall be chargeable from the first year of commercial operation. In case of commercial operation of the asset for part of the year, depreciation shall be charged on pro rata basis"

"(5) Depreciation shall be calculated annually based on Straight Line Method and at rates specified in Appendix-II to these regulations for the assets of the generating station and transmission system:

Provided that the remaining depreciable value as on 31st March of the year closing after a period of 12 years from the effective date of commercial operation of the station shall be spread over the balance useful life of the assets.

(6) In case of the existing projects, the balance depreciable value as on 1.4.2014 shall be worked out by deducting the cumulative depreciation as admitted by the Commission upto 31.3.2014 from the gross depreciable value of the assets."

53. The depreciation has been worked out considering the admitted capital expenditure as on 31.3.2014 and accumulated depreciation up to 31.3.2014. The depreciation allowed for the instant asset is as follows:-

(₹ in lakh)

Depreciation	2014-15	2015-16	2016-17	2017-18	2018-19
Opening Gross Block	40246.82	40351.52	43066.46	43104.75	43104.75
Additional Capitalisation	104.70	2714.94	38.29	0.00	3155.02
Closing Gross Block	40351.52	43066.46	43104.75	43104.75	46259.77
Average Gross Block	40299.17	41708.99	43085.61	43104.75	44682.26
Rate of Depreciation	2.07	2.60	3.10	3.10	4.05
Depreciable Value	36003.13	37271.97	38510.92	38528.15	39947.91
Balance Useful life of the asset	7	6	5	4	3
Elapsed Life	23	24	25	26	27
Remaining Depreciable Value	5849.79	6514.75	6669.22	5352.60	5434.21
Depreciation	835.68	1085.79	1333.84	1338.15	1811.40

Operation & Maintenance Expenses ("O&M Expenses")

54. Clause 3(a) of Regulation 29 of the 2014 Tariff Regulations specifies the norms for O&M Expenses for the transmission system. The total allowable O&M Expenses for the instant assets have been worked out and allowed are as follows:-

Particulars	2014-15	2015-16	2016-17	2017-18	2018-19
400 kV Bays:					
No. of Bays	25	25	25	25	25
Norms (₹ lakh/Bay)	60.30	62.30	64.37	66.51	68.71
Transmission Line:					
S/C (Twin/Triple) (KM)	1994.379	1994.379	1994.379	1994.379	1994.379
Norms (₹ lakh/KM)	0.404	0.418	0.432	0.446	0.461
D/C Twin/Triple conductor (KM)	267.20	267.20	267.20	267.20	267.20
Norms (₹ lakh/KM)	0.707	0.731	0.755	0.78	0.806
Total O&M Expenses (₹ lakh)	2502.14	2586.47	2672.56	2760.66	2852.52

55. The petitioner has further submitted that the wage revision of the employees of the petitioner company is due during 2014-19 and actual impact of wage hike which will be effective from a future date has also not been factored in fixation of the normative O&M rate specified for the 2014-19 tariff period. The petitioner has also prayed that it will approach the Commission for suitable revision in the norms of O&M Expenses for claiming the impact of such increase. We would like to clarify that any application filed by the petitioner for revision of O&M Expenses on account of wage revision will be dealt with in accordance with the appropriate provisions of the 2014 Tariff Regulations. The O&M Expenses are allowed for the instant transmission asset as per prevailing norms.

Interest on Working Capital ("IWC")

56. Clause 1 (c) of Regulation 28 and Clause 5 of Regulation 3 of the 2014 Tariff Regulations specifies as follows:

“28. Interest on Working Capital

- (c) (i) Receivables equivalent to two months of fixed cost;
(ii) Maintenance spares @ 15% of operation and maintenance expenses specified in regulation 29; and
(iii) Operation and maintenance expenses for one month”

“(5) ‘Bank Rate’ means the base rate of interest as specified by the State Bank of India from time to time or any replacement thereof for the time being in effect plus 350 basis points;”

57. The petitioner has submitted that it has computed interest on working capital for the tariff block 2014-19 considering the SBI Base Rate plus 350 basis points as on 1.4.2014. The rate of interest on working capital considered is 13.50%.

58. The interest on working capital is worked out in accordance with Regulation 28 of the 2014 Tariff Regulations. The rate of interest on working capital considered is 13.50% (SBI Base Rate of 10% plus 350 basis points). The components of the working capital and interest thereon have been worked as follows:-

(₹ in lakh)

Interest on Working Capital	2014-15	2015-16	2016-17	2017-18	2018-19
O & M expenses	208.51	215.54	222.71	230.05	237.71
Maintenance Spares	375.32	387.97	400.88	414.10	427.88
Receivables	1190.42	1267.87	1339.11	1349.70	1465.21
Total	1774.25	1871.38	1962.71	1993.85	2130.80
Rate of Interest (%)	13.50	13.50	13.50	13.50	13.50
Interest on Working Capital	239.52	252.64	264.97	269.17	287.66

ANNUAL FIXED CHARGES FOR THE 2014-19 TARIFF PERIOD

59. The transmission charges allowed for the instant transmission assets for the 2014-19 tariff period are summarised below:-

(₹ in lakh)

Particulars	2014-15	2015-16	2016-17	2017-18	2018-19
Depreciation					
Opening Gross Block	40246.82	40351.52	43066.46	43104.75	43104.75
Additional Capitalisation	104.70	2714.94	38.29	0.00	3155.02

Particulars	2014-15	2015-16	2016-17	2017-18	2018-19
Closing Gross Block	40351.52	43066.46	43104.75	43104.75	46259.77
Average Gross Block	40299.17	41708.99	43085.61	43104.75	44682.26
Rate of Depreciation	2.07	2.60	3.10	3.10	4.05
Depreciable Value	36003.13	37271.97	38510.92	38528.15	39947.91
Balance Useful life of the asset	7	6	5	4	3
Elapsed Life	23	24	25	26	27
Remaining Depreciable Value	5849.79	6514.75	6669.22	5352.60	5434.21
Depreciation	835.68	1085.79	1333.84	1338.15	1811.40
Cumulative depreciation	30989.03	31843.01	33175.55	34513.70	36325.11
Interest on Loan					
Gross Normative Loan	22082.63	22155.92	24056.38	24083.18	24083.18
Cumulative Repayment upto Previous Year	22082.63	22155.92	23241.71	24083.18	24083.18
Net Loan-Opening	0.00	0.00	814.67	0.00	0.00
Additions	73.29	1900.46	26.80	0.00	2208.51
Repayment during the year	73.29	1085.79	841.47	0.00	1811.40
Net Loan-Closing	0.00	814.67	0.00	0.00	397.11
Average Loan	0.00	407.33	407.33	0.00	198.56
Weighted Average Rate of Interest on Loan	0.0000%	8.4000	8.4000	8.4000	8.4000
Interest	0.00	34.22	34.22	-	16.68
Return on Equity					
Opening Equity	18164.19	18195.60	19010.09	19021.57	19021.57
Additions	31.41	814.48	11.49	0.00	946.51
Closing Equity	18195.60	19010.09	19021.57	19021.57	19968.08
Average Equity	18179.90	18602.84	19015.83	19021.57	19494.83
Return on Equity (Base Rate)	15.500	15.500	15.500	15.500	15.500
MAT rate for the respective year	20.961	20.961	20.961	20.961	20.961
Rate of Return on Equity	19.610	19.610	19.610	19.610	19.610
Return on Equity	3565.16	3648.10	3729.09	3730.22	3823.02
Interest on Working Capital					
O & M expenses	208.51	215.54	222.71	230.05	237.71
Maintenance Spares	375.32	387.97	400.88	414.10	427.88
Receivables	1190.42	1267.87	1339.11	1349.70	1465.21
Total	1774.25	1871.38	1962.71	1993.85	2130.80
Rate of Interest (%)	13.50%	13.50%	13.50%	13.50%	13.50%
Interest on working capital	239.52	252.64	264.97	269.17	287.66
Annual Transmission Charges					



Particulars	2014-15	2015-16	2016-17	2017-18	2018-19
Depreciation	835.68	1085.79	1333.84	1338.15	1811.40
Interest on Loan	0.00	34.22	34.22	0.00	16.68
Return on Equity	3565.16	3648.10	3729.09	3730.22	3823.02
Interest on Working Capital	239.52	252.64	264.97	269.17	287.66
O & M Expenses	2502.14	2586.47	2672.56	2760.66	2852.52
Total	7142.51	7607.22	8034.67	8098.20	8791.29

Deferred Tax Liability

60. The petitioner has sought recovery of deferred tax liability before 1.4.2009 from the beneficiaries or long term consumers/ DICs as and when materialized. The deferred tax liability shall be dealt as per Regulations 49 of the 2014 Tariff Regulations, as amended. Accordingly, the petitioner is entitled to recover the deferred tax liability upto 31.3.2009 whenever the same gets materialized directly from the beneficiaries or long term transmission customers /DICs.

Filing Fee and the Publication Expenses

61. The petitioner has sought reimbursement of fee paid by it for filing the petition and publication expenses. The petitioner shall be entitled for reimbursement of the filing fees and publication expenses in connection with the present petition, directly from the beneficiaries on pro-rata basis in accordance with Regulation 52 (1) of the 2014 Tariff Regulations.

Licence Fee & RLDC Fees and Charges

62. The petitioner shall be entitled for reimbursement of licence fee in accordance with Regulation 52 (2) (b) of the 2014 Tariff Regulations for 2014-19 tariff period. The petitioner shall also be entitled for recovery of RLDC fee & charges in accordance with Regulations 52 (2) (a) of the 2014 Tariff Regulations for 2014-19 tariff period.

Service Tax

63. The petitioner has prayed for reimbursement of service tax if it is subjected to such tax in future. We are of the view that the petitioner's prayer is premature.

Sharing of Transmission Charges

64. The billing, collection and disbursement of the transmission charges approved shall be governed by the provisions of Central Electricity Regulatory Commission (Sharing of Inter-State Transmission Charges and Losses) Regulations, 2010, as amended from time to time as provided in Regulation 43 of the 2014 Tariff Regulations.

65. This order disposes of Petition No. 35/TT/2015.

Sd/-
(Dr. M.K. Iyer)
Member

Sd/-
(A.S. Bakshi)
Member