# CENTRAL ELECTRICITY REGULATORY COMMISSION NEW DELHI

Petition No. 90/AT/2017

Coram:

Shri Gireesh B. Pradhan, Chairperson Shri A. K. Singhal, Member Shri A. S. Bakshi, Member Dr. M. K. Iyer, Member

Date of Order: 6<sup>th</sup> of July, 2017

#### In the matter of

Application under Section 63 of the Electricity Act, 2003 for adoption of transmission charges with respect to the Transmission System associated with established by Kohima-Mariani Transmission Limited.

## And In the matter of

Kohima-Mariani Transmission Limited A-63, FIEE Complex, Okhla Industrial Area Phase-II New Delhi-110 020

..... Petitioner

Vs

- 1. Department of Power, Government of Arunachal Pradesh Vidyut Bhawan, Itanagar, Arunachal Pradesh-791 111
- 2. Assam Electricity Gird Corporation Limited 4<sup>th</sup> Floor, Bijulee Bhawan, Paltan Bazar, Guwahati-I, Assam-781 001
- 3. Manipur State Power Distribution Company Limited Electricity Complex, Patta No. 1293 under 87(2), Khwai Bazar, Keishampat, District-Imphal West, Manipur-795 001
- 4. Meghalaya State Power Distribution Company Limited Lum Jingshai, Sort Round Road,

Shillong, Meghalaya-793 001

5. Department of Power Government of Nagaland A.G.Colony, Kohima, Nagaland-797 005

6. Power and Electricity Department Government of Mizoram Mizoram Secretariat, Annexure-II, Treasury, Square Aizwal, Mizoram

7. Tripura State Electricity Corporation Limited Bidyut Bhawan, Banamalipur, Agartala, Tripura

.....Respondents

#### The following were present:

Shri Rishi Agarwal, Advocate, KMTL Shri K.Choudhery, KMTL Shri Sanjay Nayak, PFCCL Shri N.C.Gupta, PFCCL Shri Ritu Raj, PFCCL

#### <u>ORDER</u>

The Petitioner, Kohima-Mariani Transmission Limited (KMTL), has filed the present petition under Section 63 of the Electricity Act, 2003 (hereinafter referred to as the 'Act') for adoption of transmission charges in respect of "transmission of electricity for North Eastern Region Strengthening Scheme-VI (NERSS-VI)" on Build, Own, Operate and Maintain (BOOM) basis (hereinafter referred to as "Transmission System").

2. Section 63 of the Electricity Act, 2003 provides as under:

"Section 63. Determination of tariff by bidding process: Notwithstanding anything contained in section 62, the Appropriate Commission shall adopt the

tariff if such tariff has been determined through transparent process of bidding in accordance with the guidelines issued by the Central Government."

- 3. Government of India, Ministry of Power has notified the Guidelines under Section 63 of the Act vide Resolution No. 11/5/2005-PG(i) dated 17.4.2006. The salient features of the Guidelines are discussed in brief as under:
  - (a) The Guidelines are applicable for procurement of transmission services for transmission of electricity through tariff based competitive bidding and for selection of transmission service provider for new transmission lines and to build, own, maintain and operate the specified transmission system elements.
  - (b) For procurement of transmission services, required for inter-State transmission, the Central Government shall notify any Central Government Organization or any Central Public Sector Undertakings, the Bid Process Coordinator (BPC) who would be responsible for coordinating the bid process.
  - (c) The BPC shall prepare the bid documentations in accordance with the Guidelines and obtain approval of the Appropriate Commission or alternatively, the BPC can use the standard bid documents notified by the Ministry of Power. Approval of the Appropriate Commission would be necessary if any material deviation is proposed to be made in the Standard Bid Documents. Intimation about the initiation of the bid process shall be sent by the BPC to the Appropriate Commission.

\_\_\_\_\_\_

- (d) For procurement of transmission charges under the Guidelines, the BPC may adopt at its option either a two-stage process featuring separate Request for Qualifications (RfQ) and Request for Proposal(RFP) or adopt a single stage two envelope tender process combining both RFQ and RFP processes.
- (e) RfQ or combined RfQ and RfP notice shall be issued in at least two national newspapers, on websites of the BPC and the appropriate Government and preferably in the trade magazines also to provide wide publicity. For the purpose of issue of RfQ, minimum conditions to be met by the bidder shall be specified in RfQ notice. The bidding shall be by way of International Competitive Bidding.
- (f) Standard documentations to be provided in the RFQ stage shall include definitions of requirements including the details of location and technical qualifications for each component of the transmission lines, construction milestones and financial requirements to be met by the bidders; proposed Transmission Service Agreement; period of validity of offer of bidder; conditions as specified by the Appropriate Commission for being eligible to obtain transmission licence and other technical and safety criteria to be met by the bidder/TSP including the provisions of Indian Electricity Grid Code (Grid Code).
- (g) Standard documentations to be provided by BPC in the RFP shall include specified target dates/months for commissioning and commercial operations and start of providing transmission services. TSA proposed to be entered with the selected bidder; bid evaluation methodology to be adopted by the BPC; Discount

Factor to be used for evaluation of the bids; specification regarding the bid bond and project completion guarantee to be furnished by the bidders, proposed indemnification agreement between the TSP and the utilities, amount of contract performance guarantee as percentage of the project cost; and the liquidated damages that would apply in the case of delay in start of providing the transmission services.

- (h) To ensure competitiveness, the minimum number of qualified bidders shall be two. The BPC shall constitute a committee for evaluation of the bids with at least one member from Central Electricity Authority (CEA) and the concerned Regional Power Committees. The member from CEA shall have expertise in the cost engineering of transmission projects. The bids shall be opened in public and the representative of the bidders shall be allowed to remain present. The technical bids shall be scored to ensure that only the bids that meet the minimum technical criteria set out in the RFQ shall be considered for further evaluation on the transmission charge bids. The transmission charge bid shall be rejected if it contains any deviation from the tender conditions for submission of the same. The bidder who has quoted the lowest transmission charge as per the evaluation procedure shall be considered for the award.
- (i) The Guidelines provide for suggested time tables for the bid process. The timeline suggested for a two stage bid process is 240 days and single stage two envelope bid process is 180 days. The BPC is empowered to give extended

.....

time-frame based on the prevailing circumstances and such alterations shall not be construed as the deviation from the Guidelines.

- (j) The selected bidder shall make an application for grant of transmission licence to the Appropriate Commission within ten days from the date of issue of Lol subject to further extension of time as provided under para 2.4 of the RFP. The TSA shall be signed with the selected bidder in accordance with the terms and conditions as finalized in the bid document before the RFP stage.
- (k) The BPC shall make evaluation of the bid public by indicating the terms of the winning bid and anonymous comparison of all other bids. All contracts signed with the successful bidder shall also be made public. The final TSA along with the certification of BPC shall be forwarded to the Appropriate Commission for adoption of tariff in terms of Section 63 of the Act.
- 4. Therefore, we have to examine whether the process as per provisions of the Guidelines has been followed in the present case for arriving at the lowest levelized transmission charges and for selection of the successful bidder.
- 5. Ministry of Power, Government of India, vide its Notification No. 2454, dated 17.11.2015, notified the PFC Consulting Limited (hereinafter referred to as PFCCL) as the Bid Process Coordinator (BPC) for the purpose of selection of bidder as Transmission Service Provider (TSP) to establish the transmission system for

"transmission of electricity for North Eastern Region Strengthening Scheme-VI (NERSS-VI)" through tariff based competitive bidding process.

6. Kohima-Mariani Transmission Limited was incorporated on 22.1.2016 under the Companies Act, 2013 as a wholly owned subsidiary of PFCCL with the objective to establish the "transmission of electricity for North Eastern Region Strengthening Scheme-VI (NERSS-VI)" and to act as the Transmission Service Provider after being acquired by the successful bidder. The main objectives of the petitioner company in its Memorandum of Associations are as under:

"To plan, promote and develop an integrated and efficient power transmission system network in all its aspects including planning, investigation, research, design and engineering, preparation of preliminary, feasibility and definite project reports, construction, operation and maintenance of transmission lines, substations, load dispatch stations and communication facilities and appurtenant works, coordination of integrated operation of regional and national grid system, execution of turn-key jobs for other utilities/organizations and wheeling of power in accordance with the policies, guidelines and objectives laid down by the Central Government from time to time".

7. PFCCL as the BPC prepared the bidding documents such as RfQ and RfP in accordance with the Standard Bid Documents issued by the Ministry of Power, Government of India. The BPC started the process of selection of TSP with the publication of Global Invitation for Qualification on 14.1.2016 for selection of developer on BOOM basis for the project. The notice for RfQ was published on 15.1.2016 in all the editions of Hindustan Times, Hindustan (Hindi), Mint (English) and Financial Times (Global Editions) with the last date of submission of response to RfQ as 15.2.2016. Intimation regarding the initiation of the bid process was given to the Central

.....

Commission in accordance with para 4.2 of the Guidelines vide letter No. 03/ITP-22/15-16/KMTL/RFQ dated 15.1.2016.

8. The key milestones in the bidding process were as under:

S. No.	Events	Date
1.	Publication of RFQ	14.1.2016
2.	Submission of Request for Qualification	15.2.2016
3.	Issuance of Request for Proposal	2.8.2016
4.	Technical and Price bid (on line) submission	25.11.2016
5.	Technical bid opening (on line)	25.11.2016
6.	Financial Bid opening (on line)	12.1.2017
7.	Issuance of Letter of Intent to successful bidder	17.1.2017
8.	Signing of Share Purchase Agreement and	31.3.2017
	transfer of Special Purpose Vehicle	

9. The scope of the Project as per the Request for Proposal (RfP) and the Transmission Service Agreement is as under:

S.No.	Scheme/ Transmission Works	Conductor Specifications/ Configuration	Completion Target
	Establishment of 400/220 kV, 7X167 MVA (Single Phase including one spare) S/S at New Kohima  400KV		40 months from the effective date
	<ul> <li>ICTs: 400/220 kV, 7X167 MVA Single Phase (including one spare)</li> <li>ICT Bays: 2 No.</li> <li>Line Bays: 4 No.</li> <li>Bus Reactor: 2X125 MVAR</li> <li>400 kV bus reactor bays: 2 No.</li> <li>Space for Future Bays: 4 No. (along with space for switchable line reactor)</li> <li>220 KV</li> <li>ICTs bays: 2 No.</li> <li>Line Bays: 2 No.</li> </ul>		

\_\_\_\_\_\_

	Space for Future Bays: 6 No. Space for 400/220 kV, 3X167 MVA ICT along with associated bays	
(b)	Imphal-New Kohima 400 kV D/C line	
(c)	New Kohima-New Mariani 400 kV D/C line	

10. The identified Long Term Transmission Customers (LTTCs) of the project are as under:

S No.	Name of the Long Term Transmission Customer
1.	Department of Power, Government of Arunachal Pradesh
2.	Assam Electricity Grid Corporation Limited
3.	Manipur State Power Distribution Company Limited
4.	Meghalaya Energy Corporation Limited
5.	Department of Power and Electricity, Government of Mizoram
6.	Department of Power, Government of Nagaland
7.	Tripura State Electricity Corporation Limited

\_\_\_\_\_

- 11. As per the decision of the Empowered Committee on Transmission, the Bid Evaluation Committee (BEC) comprising of the following was constituted:
  - (a) Shri Padmakumar M. Nair, Sr. Vice President and Head, SBI Capital Markets .Chairman
  - (b) Shri Anog Perme, Chief Engineer (EE Zone), Department of Power,
    Govt. of Arunachal Pradesh, Itnagar .Member
  - (c) Shri K.Michieo, Chief Engineer (P), Department of Power, Govt of Nagaland, Kohima
  - (d) Shri S.K.Ray Mohapatra, Chief Engineer (PSETD), CEA .Member
  - (e) Shri Ravinder Gupta, Chief Engineer (PSP&PA-I), CEA .Member
  - (f) Shri H. K. Das, Chairman, Kohima Mariani Transmission Ltd

Convener- Member

.Member

12. Responses to RfQ were received from five bidders as per details given below:

S.No.	Name of Bidders
1.	Sterlite Grid 4 Limited
2.	Essel Infraprojects Limited
3.	Adani Transmission Limited
4.	Kalpataru Power Transmission Limited
5.	Energon Urja Private Limited

13. The responses to the RfQ were opened 15.2.2016 in the presence of the representatives of the bidders. Bid Evaluation Committee recommended the following four bidders as qualified at RfP stage:

S.No.	Name of Bidders
1.	Sterlite Grid 4 Limited
2.	Essel Infraprojects Limited
3.	Adani Transmission Limited
4.	Kalpataru Power Transmission Limited

14. The following three bidders submitted RfP online through MSTC portal:

S.No.	Name of Bidders
1.	Kalpataru Power Transmission Limited
2.	Sterlite Grid 4 Limited
3.	Adani Transmission Limited

- 15. Bid Evaluation Committee opened online RfP (Non-financial) bids of all the three bidders through MSTC portal and hard copies along with the bid bond on 25.11.2016. BEC declared RfP (Non-financial) bids of all the three bidders as responsive for opening of their RfP (Financial) bids. Bid Evaluation Committee opened online RfP (Financial) bids Initial Price Offer (IPO) on 12.1.2017. The lowest IPO discovered (Best Deal) at MSTC Portal was Rs. 2148.21 million per annum which was communicated to the above three bidders for participating in the e-reverse bidding process. The e-reverse bidding was carried out at MSTC Portal on 13.1.2017. Based on the e-reverse bidding, BidEvaluation Committee recommended Kalpataru Power Transmission Limited with the lowest levelised transmission charges of Rs. 2027.43 million/annum as the successful bidder.
- 16. Letter of Intent was issued by the BPC on 17.1.2017 to the successful bidder i.e Kalpataru Power Transmission Limited. In accordance with para 12.3 of the Guidelines, the BPC has hosted on the website of PFCCL, the final result of the evaluation of the bids for selection of developer for the project.
- 17. In accordance with the provisions of the bid documents and LoI issued in its favour, the petitioner has prayed for adoption of the transmission charges for the project which has been discovered through the process of competitive bidding.
- 18. In accordance with para 2.4 of RfP, the selected bidder shall within 10 days of issue of the Letter of Intent, accomplish the following tasks:
  - (a) Provide Contract Performance Guarantee in favour of the LTTCs;

- (b) Execute the Share Purchase Agreement
- (c) Acquire, for the acquisition price, one hundred percent equity shareholdings of Kohima-Mariani Transmission Limited from PFCCL, along with all its related assets and liabilities;
- (d) Make an Application to the Central Electricity Regulatory Commission for adoption of charges under Section 63 of the Electricity Act, 2003;
- (e) Apply to Central Electricity Regulatory Commission for grant of transmission licence.
- 19. The proviso to para 2.4 of the RfP further provides that "if for any reason attributable to the BPC, the above activities are not completed by the Selected Bidder within the above period of ten (10) days as mentioned in this clause, such period of 10 days shall be extended, on a day to day basis till the end of the Bid validity period". Though Lol was issued on 17.1.2017, BPC, vide its letter dated 31.3.2017, in terms of proviso to clause 2.4 of RfP extended the date upto 10.4.2017 for completion of all activities by the successful bidder. The selected bidder furnished the Contract Performance Guarantee to the Long Term Transmission Customers of the project for an amount of Rs. 42.30 crore and has acquired hundred percent equity-holding in the applicant company on 31.3.2017 after execution of the Share Purchase Agreement. The TSP on behalf of the selected bidder filed the application through e-filing portal for adoption of tariff on 7.4.2017.

- 20. On receipt of the present petition, BPC vide letter dated 19.4.2017 was directed to submit the relevant documents regarding complete process of competitive bidding. The necessary details have been filed by the BPC under affidavit dated 1.5.2017.
- 21. Notices were issued to all the respondents who are the Long Term Transmission Customers of the project. No reply has been filed by the respondents. Notice was also issued to PFCCL in its capacity as Bid Process Coordinator. PFCCL has filed the copies of all relevant documents pertaining to the bidding process.
- 22. The petition was heard on 25.5.2017. During the course of hearing, it was observed that Bid Evaluation Committee (BEC) in its minutes of meeting dated 13.1.2017 has not mentioned any comments on the model tariff worked out based on estimated cost communicated by CEA. However, Bid Processing Co-ordinator (BPC) i.e. PFCCL has submitted a model tariff computation based on the methodology for calculation of tariff as per CERC norms as Rs. 1604.50 million. It was further observed that the successful bidder has made bid for Rs. 2027.43 million which is higher than the levelised transmission charges computed as per CERC norms by BEC i.e. 1604.50 million. Accordingly, BPC, vide Record of Proceedings for the hearing dated 25.5.2017, was directed to submit comments of BEC on the higher levelised tariff in comparison with the tariff worked out as per CERC tariff norms, based on the estimated cost

.....

communicated by CEA and documentary proof for the estimated cost of the project communicated by CEA.

23. BPC, vide its affidavit dated 20.6.2017, has submitted as under:

"Subsequent to RP of CERC, a BEC meeting was convened to deliberate on the issue and BEC noted the following:

- (i) The estimated cost of the project as communicated by CEA vide its letter dated September 06, 2016 is Rs. 1044 crores.
- (ii) As per CERC Tariff norms and cost provided by CEA, the levelised transmission charges worked out to be Rs. 1604.50 million per annum.
- (iii) The transmission charge discovered through the e-reverse bidding process is Rs. 2027.43 Million per annum.
- (iv) BEC observed that the levelised transmission charge discovered through the e-Reverse bidding process is Rs. 2027.43 million per annum vis-a-vis levelised tariff as per CERC Tariff Regulations of Rs. 1604.50 million per annum is 26% higher.
- (v) BEC during its meeting held on January 13, 2017 it had also certified that the rates quoted by the Successful Bidder, M/s Kalpataru power Transmission Limited, are in line with the prevalent market prices.
- (vi) It may be noted that BEC in its meeting held on January 13, 2017 while recommending that the rates quoted by the Successful Bidder are in line with the prevailing market price, had considered and deliberated that as the project is in the North Eastern region of India and all the bidders might have factored in costs pertaining to delays in getting clearances and might have provisioned for other project implementation related risks like difficult terrain, poor accessibility, other disturbances etc. because of which the quoted transmission charges were higher by 26% that the transmission charges computed based on CERC norms. Moreover, the price had been discovered after Reverse Auction as per extant instructions.
- 24. PFCCL has submitted that a meeting of BEC was convened on 19.6.2017 to deliberate on the issue. BEC in the said meeting explained that the levelised

transmission charges discovered through the bidding process is Rs. 2027.43 million/annum which is 26% higher than the levelised tariff of Rs. 1604.50 million/annum worked out as per CERC Tariff Regulations. BEC has submitted that during the meeting held on 13.1.2017, it was certified that the rates quoted by the successful bidder are in line with the prevalent market prices. According to the BPC, since the project shall be implemented in North Eastern Region and considering the factors like delays in getting clearances and other project implementation related risks such as difficult terrain, poor accessibility, other disturbances, etc., the bidders have quoted the tariff. Further, the successful bidder has been selected based on reverse auction and the tariff of the selected bidder is 26% higher than the levelised transmission charges computed based on the norms of CERC. Considering the explanation of the BPC, we are of the view that the discovered price is aligned with the market price, after taking into account the project implementation risk in the NER.

- 25. Under the Guidelines, BPC has to certify that the tariff has been discovered through a transparent process of bidding and the tariff discovered is in line with prevailing market prices. The Bid Evaluation Committee, in the minutes of meeting held on 13.1.2017, has recorded as under:
  - The RFP (Financial) Bids Initial Price offer was opened online on January 12, 2017 at MSTC portal for the following three (03) Bidders for "North Eastern Region Strengthening Scheme (NERSS-VI)":
    - (i) Sterlite Grid 4 Limited
    - (ii) Kalpataru Power Transmission Limited
    - (iii) Adani Transmission Limited

- 2. The lowest Initial Price Offer (IPO) at MSTC Portal was **Rs. 2,148.21 Million per annum** which was communicated to the following qualified bidders for participating in the e-reverse bidding process to be held on MSTC Portal on January 13, 2017 at 11:00 Hrs.
  - (i) Sterlite Grid 4 Limited
  - (ii) Kalpataru Power Transmission Limited
  - (iii) Adani Transmission Limited
- 3. The e-reverse bidding was carried out at MSTC Portal on January 13, 2017 at 11:00 Hrs which closed on January 13, 2017 at 14:27:57 hrs. All the three bidders participated in the e-reverse bidding. The Evaluation report is attached as **Annexure-I.**"
- 4. The final offer (levelised Transmission Charges) of each Bidder as quoted at the time of closing of e-reverse bidding is as under:

S. No.	Name of the Bidder	Levelised Transmission Charges (In Indian Rupees Million per annum)	Ranking of Bidders based on Levelised Tariffs
1.	Sterlite Grid 4 Limited	2032.92	L-2
2.	Kalpataru Power Transmission Limited	2027.43	L-1
3.	Adani Transmission Limited	2126.95	L-3

- 5. Based on the e-reverse bidding, the lowest final offer (levelised Transmission Charge) of **Kalpataru Power Transmission Limited is Rs. 2027.43 Million per annum** may be declared as the successful bidder.
- 6. The Bid Evaluation Committee also certifies and confirms that the Evaluation of the Responses to RFQ and RFP Bids has been carried out in accordance with the provisions of the Guidelines and the Standard Bid Documents (RFQ & RFP)."
- 28. Bid Evaluation Committee vide its certificate dated 13.1.2017 has certified as under:

"It is	hereby	certified	that

- M/s Kalpataru power Transmission Limited has emerged as the Successful Bidder with the lowest levelised transmission charge of Rs. 2027.43 Million per annum for the subject project after completion of e-reverse bidding at MSTC portal.
- **2.** The rates quoted by the Successful Bidder **M/s Kalpataru Power Transmission Limited** are in the line with the prevalent market prices.
- 3. The entire bid process has been carried out in accordance with the "Tariff based Competitive Bidding Guidelines for Transmission Service" and "Guidelines for encouraging competition in development of the Transmission Projects" issued by Ministry of Power, Govt. of India under Section 63 of the Electricity Act, 2003 as amended from time to time and the Standard Bid Documents (RFQ, RFP & TSA) notified by Ministry of Power, Govt. of India."
- 29. In the light of the discussions in the preceding paragraphs, it emerges that selection of the successful bidder and the process of arriving at the levelised tariff of the project through competitive bidding has been carried out by the Bid Process Coordinator through a transparent process in accordance with the Guidelines and Standard Bid Documents. The Bid Evaluation Committee has certified that the process is in conformity with the MOP Guidelines. The BEC in its certificate dated 13.1.2017 has certified that the rates quoted by the successful bidder (extracted as Appendix to this order) are in line with the prevailing prices. The Commission is not required to go into the cost details of the bids as per the bidding guidelines and has to adopt the tariff if the same has been discovered in accordance with the Guidelines. Based on the certification of the BEC, we approve and adopt the levelised transmission charges for the project as per the Appendix to this order which shall remain valid throughout the period covered in the TSA. The sharing of the transmission charges by the LTTCs shall be governed by the provisions of the Central Electricity Regulatory Commission (Sharing of inter-State Transmission Charges and Losses) Regulations, 2010 as amended from time to time.

- 30. A copy of this order shall be sent to CTU and Long Term Transmission Customers of the transmission system.
- 31. The Petition No. 90/AT/2017 is disposed of in terms of the above.

Sd/- sd/- sd/- sd/- (Dr. M. K. Iyer) (A.S. Bakshi) (A.K. Singhal) (Gireesh B.Pradhan) Member Member Chairperson

\_\_\_\_\_\_

### Appendix

Year (Term of Licence)	Commencement Date of Contract Year	End Date of Contract Year	Quoted Non- Escalable Transmission Charges ( Rs. Millions)	Quoted Escalable Transmission Charges (Rs. Millions)
1	Scheduled COD 29 <sup>th</sup> April 2020	31-March-21	1674.0	0.00
2	1-April-21	31-March-22	2222.0	Same as Above
3	1-April-22	31-March-23	2375.0	Same as Above
4	1-April-23	31-March-24	2375.0	Same as Above
5	1-April-24	31-March-25	2295.0	Same as Above
6	1-April-25	31-March-26	2247.0	Same as Above
7	1-April-26	31-March-27	2247.0	Same as Above
8	1-April-27	31-March-28	2247.0	Same as Above
9	1-April-28	31-March-29	2222.0	Same as Above
10	1-April-29	31-March-30	2222.0	Same as Above
11	1-April-30	31-March-31	2222.0	Same as Above
12	1-April-31	31-March-32	2150.0	Same as Above
13	1-April-32	31-March-33	2032.0	Same as Above
14	1-April-33	31-March-34	1674.0	Same as Above
15	1-April-34	31-March-35	1674.0	Same as Above
16	1-April-35	31-March-36	1674.0	Same as Above
17	1-April-36	31-March-37	1674.0	Same as Above
18	1-April-37	31-March-38	1674.0	Same as Above
19	1-April-38	31-March-39	1674.0	Same as Above
20	1-April-39	31-March-40	1674.0	Same as Above
21	1-April-40	31-March-41	1674.0	Same as Above
22	1-April-41	31-March-42	1674.0	Same as Above
23	1-April-42	31-March-43	1674.0	Same as Above
24	1-April-43	31-March-44	1674.0	Same as Above
25	1-April-44	31-March-45	1674.0	Same as Above
26	1-April-45	31-March-46	1674.0	Same as Above
27	1-April-46	31-March-47	1674.0	Same as Above
28	1-April-47	31-March-48	1674.0	Same as Above
29	1-April-48	31-March-49	1674.0	Same as Above
30	1-April-49	31-March-50	1674.0	Same as Above
31	1-April-50	31-March-51	1674.0	Same as Above
32	1-April-51	31-March-52	1674.0	Same as Above
33	1-April-52	31-March-53	1674.0	Same as Above
34	1-April-53	31-March-54	1674.0	Same as Above
35	1-April-54	31-March-55	1674.0	Same as Above
36	1-April-55	35 <sup>th</sup> anniversary of scheduled COD	1674.0	Same as Above