



ಪವರ್ ಕಂಪನಿ ಆಫ್ ಕರ್ನಾಟಕ ಲಿಮಿಟೆಡ್  
**POWER COMPANY OF KARNATAKA LIMITED**

(GOVERNMENT OF KARNATAKA UNDERTAKING)

ನಿಗಮದ ಗುರುತಿನ ಸಂಖ್ಯೆ (ಸಿ.ಐ.ಎನ್) : ಯು40101ಕೆಎ2007ಎಸ್‌ಜಿಎ043640

Company Identification No (CIN) :U40101KA2007SGC043640

No: PCKL/ A12/5/2018-19/ 1179-85

20 MAY 2024

The Secretary,  
Central Electricity Regulatory Commission,  
3<sup>rd</sup> and 4<sup>th</sup> Floor, Chandralok Building,  
36, Janpath, New Delhi – 110001.

Sir,

**Sub:** Central Electricity Regulatory Commission (Fees and Charges of Regional Load Despatch Centre and other related matters) Regulations, 2024— **reg**

**Ref:** No. L-1/271/2024/CERC dated 04.04.2024.

With reference to the above, PCKL wish to submit the comments as Annexure- A on the Draft Central Electricity Regulatory Commission (Fees and Charges of Regional Load Despatch Centre and other related matters) Regulations, 2024 for kind consideration.

Yours faithfully

**ADDITIONAL DIRECTOR (PROJECTS)**

Copy to:

1. PS to Additional Chief Secretary to Govt, Energy Department, Vidhana Soudha, Bengaluru
2. The Managing Director, BESCOM, K.R Circle, Bengaluru-560001
3. The Managing Director, HESCOM, Navanagar, Hubballi-580025.
4. The Managing Director, GESCOM, Station Main Road, Kalaburgi-585102.
5. The Managing Director, MESCOM, Corporate office, 4th Floor, MESCOM Bhavan, Bejai,Kavoor cross Road, Mangaluru-575004.
6. The Managing Director, CESC, Corporate Office, No. CA-29, Vijaynagar 2nd Stage, Hinakal, Mysuru – 570 017.

**Annexure-A**

<b>As per CERC Regulation</b>	<b>Comments</b>
<p>10. Determination of fees and charges for the period 2024-29</p> <p>(6) The Fees and Charges shall be determined separately for each of the Regional Load Despatch Centres and National Load Despatch Centre (including the Corporate Centre) by the Commission:</p> <p>Provided that the annual LDC charges of NLDC including Corporate Centre expenses for the control period shall be apportioned among Regional Load Despatch Centres on the basis of the GNA of the drawee DICs located in the respective region as on 31.3.2024.</p>	<p>Provided that the annual LDC charges of NLDC including Corporate Centre expenses for the control period shall be apportioned among Regional Load Despatch Centres on the basis of the GNA of the drawee DICs located in the respective region <b>on the basis of GNA of the preceding month.</b></p>
<p>13. Computation of Capital Cost</p> <p>(2)(v) Any grant received from the Central or State Government or any statutory body or authority for execution of the project which does not carry any liability of repayment shall be excluded from the Capital Cost for the purpose of computation of interest on loan, return on equity and depreciation;</p>	<p>Any grant received from the Central or State Government or any statutory body or authority for execution of the project which does not carry any liability of repayment shall be excluded from the Capital Cost for the purpose of computation of interest on loan, return on equity, <b>interest on working capital</b> and depreciation;</p> <p><b>Rationale:</b> Interest on working capital includes 45 days of annual charges</p>
<p>17 Annual LDC Charges (ALC):</p> <p>(1) ALC shall comprise annual RLDC charges, apportioned annual NLDC charges (including Corporate Centre expenses) and performance linked incentive for RLDCs and NLDC. ALC shall be recovered on a monthly basis.</p>	<p>Performance linked incentive invoice of RLDC and NLDC shall be on annual basis, hence this can be raised by RLDC through supplementary invoice at the end of Financial year</p>
<p>19 Interest on Loan Capital</p> <p>Provided that if there is no actual loan for a particular year but the normative loan is still outstanding, the last available weighted average rate of interest shall be considered;</p>	<p>Provided that if there is no actual loan for a particular year but the normative loan is still outstanding, the last available weighted average rate of interest <b>or One year MCLR</b></p>

<p>Provided further that if any of the Regional Load Despatch Centre does not have an actual loan, then the weighted average rate of interest on the loan of Grid-India as a whole shall be considered.</p>	<p><b>of SBI as on April 1<sup>st</sup> of relevant financial year whichever is lower shall be considered;</b></p> <p>Provided further that if any of the Regional Load Despatch Centre does not have an actual loan, then the weighted average rate of interest <b>or One year MCLR of SBI as on April 1<sup>st</sup> of relevant financial year whichever is lower</b> on the loan of Grid-India as a whole shall be considered.</p>
<p>22 Human Resource Expenses</p> <p>(1) Human Resource Expenses allowed for year 2023-2024 shall be escalated by 5.25% every year to arrive at a permissible Human Resource expenses for each year of the control period 2024-2029.</p>	<p>Human Resource Expenses allowed for year 2023-2024 <b>after Truing up</b> shall be escalated by 5.25% every year to arrive at a permissible Human Resource expenses for each year of the control period 2024-2029.</p>