

केन्द्रीय विद्युत विनियामक आयोग

CENTRAL ELECTRICITY REGULATORY COMMISSION

6th, 7th & 8th Floor, Tower-B, World Trade Centre, Nauroji Nagar, New Delhi-110029

Phone: 011-23353503; Fax-23753923

Petition No. 485/GT/2024

Date: 4th July 2025

To

Additional General Manager (Commercial)
THDC India Limited,
Bhagirath Puram, Rishikesh-249001, Uttarakhand

Subject: Petition for truing up of tariff for 2019-24 period and for determination of tariff for 2024-29 period 2024-29 in respect of Koteshwar Hydro Electric Project (KHEP)(4*100MW).

Sir,

With reference to above subject, and under Regulation 28(10) of the CERC Conduct of Business Regulations, 2023, following additional information is required to be submitted on an affidavit, with an advance copy to the Respondents, on or before **11.7.2025**:

2019-24:

Capital Cost

- (a) *Provide details of proportionate cost of land of the existing project which is being used for generating power based on renewable energy as per Reg 19 (5) (d) of the 2019 Tariff Regulations.*

Additional Capital Expenditure (ACE)

- (b) *Justification for significant cost differential between Approved v/s Claimed expenditure for the approved items claimed under additional capitalization.*
- (c) *Proper references of Page Nos. and Paragraphs of the report/recommendations of Dr. P. C. Nawani, (Consultant Geology) with respect to claimed Additional Capitalization.*
- (d) *Rationale for non-consideration of decapitalization against claimed Add-Cap items on replacement basis i.e. procurement of computer/servers/ laptops and peripherals, 67 meter steel truss bridge at downstream of KHEP, etc.*
- (e) *Relevant supporting documents along with complete details of the works and total expenditure envisaged for the same including details of the amount already claimed/allowed by the Commission for claims relating to Add-cap such as finishing work of power house, extension of existing jetty, stabilization work of left bank, stabilization work of right bank, etc, previously allowed by the Commission, balance amount to be claimed, decapitalization etc, at the time of truing up of tariff as per the direction of the Commission.*
- (f) *For items under 26 (1)(d), the relevant advice/ direction from appropriate Indian Government Instrumentality or statutory authorities specifying the need for Add-cap item.*
- (g) *Detailed breakup of "Balance Civil Works" along with supporting documents (Work Order, Completion Certificate, etc.) to substantiate its claim, as previously directed by the commission.*
- (h) *Certify that the ACE being claimed for the tariff period does not include any depreciation, corresponding to assets earning tariff at any of the generating station, by way of IEDC.*
- (i) *Specific clarification for following Additional Capitalization claimed:*

Sr. No.	Head of Work /Equipment	Additional Information / Clarification	Reference line item from Tariff forms
1	01 no of skylift machine hydraulic articulated platform 11 mtr height on tata sfc-407 by electrical deptt	Submit the existing hydraulic lifting facilities for working at height and the relevant supporting documents to substantiate the said claim under this head, as directed in the previous order.	Form 9_2019-20 Sr. No. A10
2	Rehab exp f.y. 2020-21	Justify reason for claim under 25(1)(a).	Form 9A_2020-21 Sr. No. C6
3	Rehab exp	Provide utilisation certificate and justify reason for claim under 26(1)(a).	Form 9A_2023-24 Sr. No. C15
4	construction of approach road on both side of newly erected steel truss bridge at khep	Rationale to be provided for claiming this item, even though it was previously disallowed in point 29 for add-cap claimed in 2019-20 in order 244/GT/2020 dated 03.10.2022. Also, provide supporting evidence for claim under "Balance civil works". Clarification with respect to whether this expenditure is with regard to approach road which was dealt in point 29 for add-cap claimed in 2019-20 in order 244/GT/2020 dated 03.10.2022.	Form 9A_2023-24 Sr. No. C17

Form 9Bi

- (j) Provide revised Form 9Bi including Decapitalization values corresponding to Form 9A(Decapitalization corresponding to Add-cap claimed under replacement cannot be validated).

Return on Equity (RoE)

- (k) Copy of Assessment Orders (ITR in case Assessment Order is not issued) for the FY 2019-20 to FY 2023-24.
- (l) Rationale for claiming Add Cap under Reg 25 as part of 'Capital cost eligible for RoE at weighted average rate of interest'.

Interest on Loan

- (m) Petitioner shall submit supporting documents (i.e. Bank Letter, etc.) for interest rates applied for computation of Weighted Average Rate of Interest (WAROI) in Form-13 along with details and justification of refinancing, if any.

Annex to Form-17: O&M expenses

- (n) Break-up of actual O&M expenditure for the tariff period 2019-24 under various sub-heads (as per Annexure-A enclosed) after including the pay revision impact (employees, and CISF and KV staff) (To be provided in both MS Excel and PDF format).
- (o) Similar break-up of actual O&M expenses including pay revision impact for Corporate Centre/other offices & breakup of claimed wage revision impact on employee cost, expenses on corporate centre and on salaries of CISF and KV staff and employee of the generating station (as per enclosed Annexure-B and Annexure- C, respectively) for the period 2019-24. (To be provided in both MS Excel and PDF format). [to discuss- has been provided by Petitioner].
- (p) The security assessment report, man-power deployed, auditor-certified actual expenditure incurred etc, along with supporting documents, for further consideration in terms of Regulation 35(6) of the 2019 Tariff Regulations. Further, submit the documentary evidence for Security expense, break-up of same in CISF and non- CISF,

- along with justification and documentary evidence for additional capital expenditure claimed under power to relax/additional works.
- (q) Reconciliation of claimed Security expenses with the financial statements of KHEP.
- (r) Revised excel file (with formulas and linkage) for impact of minimum wage revision is to be provided by the petitioner after recalculating the column named "Total Amount (without GST) in Rs."

Capital Spares

- (s) Provide details of decapitalization of assets [including year of put to use and value] corresponding to Capital Spares claimed for 2019-24.

2024-29

Additional Capital Expenditure (ACE):

- (t) Specific clarification for following ACE claimed:

Sr. No.	Head of Work/ Equipment	Additional Information/ Clarification	Reference line item from Tariff forms
1	Construction of sewerage treatment plant at KHEP	Clarification to be provided whether the Add-cap claimed is for work towards colony or plant.	Form 9A_2026-27 Sr. No. 2
2	R&R Expenses, Digitization of R&R Records, Law Expenses & Other Misc. Expenses.	Petitioner to segregate claims corresponding to each head.	Form 9A_2024-25 Sr. No. 9 Form 9A_2025-26 Sr. No. 3 Form 9A_2026-27 Sr. No. 1 Form 9A_2027-28 Sr. No. 1 Form 9A_2028-29 Sr. No. 2

Return on Equity

- (u) Rationale for claiming Add Cap under Reg 25 as part of 'Capital cost eligible for RoE at weighted average rate of interest'.

3. The Respondents shall file their replies by **16.7.2025** after serving copy to the Petitioner, who may file its rejoinder, if any, on or before **18.7.2025**. The due date for filing the additional information and reply/rejoinder shall be strictly complied.

4. The Petition shall be listed for hearing on **22.7.2025**.

Yours sincerely,

Sd/
(Deepak Pandey)
Assistant Chief (Law)

Copy to:

All Parties

Annexure A

Details of actual O&M expenses (Common for Hydro /Thermal Generating Station)

<i>Amount (₹ in lakh)</i>						
Sl. No.	Items	2019-20	2020-21	2021-22	2022-23	2023-24
1	Consumption of stores & spares					
2	Repair & Maintenance					
3	Insurance					
4	Security					
5	Water Charges					
6	Administrative Expenses					
6.1	Rent					
6.2	Electricity charges					
6.3	Travelling & Conveyance					
6.4	Communication Expenses					
6.5	Advertising					
6.6	Foundation Laying & Inauguration					
6.7	Donation					
6.8	Entertainment					
6.9	Filing fee					
	Subtotal (Administrative Expenses)					
7.0	Employee Cost					
7.1.1	Salaries, Wages & Allowances					
7.1.2	Pension					
7.1.3	Gratuity					
7.1.4	Provident Fund					
7.1.5	Leave Encashment					
7.2	Staff welfare expenses					
7.2.1	-Medical expenses on superannuated employees					
7.2.2	-Medical expenses on regular employees & others					
7.2.3	-Uniform/Livries & safety equipment					
7.2.4	-Canteen expenses					
7.2.5	-Other staff welfare expenses					
	Subtotal (Staff welfare Expenses)					
7.3	Productivity linked Incentive					
7.4	Expenditure on VRS					
7.5	Ex-gratia					
7.6	Performance Related Pay (PRP)					
	Sub Total (Employee Cost)					
8	Loss of Store					
9	Provisions					
10	Prior Period Expenses					
11	Corporate Office expenses allocation					
12	Others					
12.1	Rates & Taxes					
12.2	Water cess					
12.3	Training & recruitment expenses					
12.4	Tender Expenses					
12.5	Guest house expenses					
12.6	Education expenses					

12.7	Community Development Expenses					
12.8	Ash utilisation expenses					
12.9	Books & Periodicals					
12.10	Professional Charges					
12.11	Legal expenses					

Amount (₹ in lakh)						
Sl. No.	Items	2019-20	2020-21	2021-22	2022-23	2023-24
12.12	EDP Hire & other charges					
12.13	Printing & Stationery					
12.14	RLDC Fee & Charges					
12.15	Brokerage & Commission					
12.16	Bank charges					
12.17	Claims/advances written off					
12.18	Hiring of vehicle					
12.19	Payment to auditors					
12.20	Misc. Expenses					
	(Break-up Of Misc.)					

Annexure B

DETAILS OF CORPORATE CENTRE EXPENSES ALLOCATED TO VARIOUS OPERATING STATIONS						
		Amount (₹ in lakh)				
	PARTICULARS/YEAR	2019-20	2020-21	2021-22	2022-23	2023-24
	Total Expenses of CC & RHQs - (A)					
	Transferred to Construction Projects - (B)					
	Transferred to any other business activity - (C)					
	Expenses related to stations under operation (D)=(A)-(B)-(C)					
	Head Wise Details of D					
1	Employee Expenses					
A	Salaries, Wages and Allowance					
B	Staff Welfare Expenses					
C	Productivity Linked Incentive					
D	Expenditure on VRS					
E	Ex-Gratia					
2	Administrative Expenses					
A	Repair and maintenance					
B	Training and Recruitment					
C	Communication					
D	Travelling and Conveyance					
E	Rent					
F	Others -Break Up as per details given below:					
f-1	Advertisement and publicity					
f-2	Books & Periodicals					
f-3	EDP Hire and other charges					
f-4	Education expenses					
f-5	Ent. and hospitality					
f-6	Fin Expenses-IndAS					
f-7	Guest house expenses					
f-8	Hiring of Vehicles					
f-9	Insurance					
f-10	Legal Expenses					
f-11	Miscellaneous Expenses					
f-12	Community develop. Exp.					
f-13	Others.					
f-14	Payment to auditors					
f-15	Power Charges					
f-16	Printing and Stationery					
f-17	Prof chg & cons fees					
f-18	R&D EXPS					
f-19	Rates and taxes					
f-20	Tender expenses					
f-21	Trpt Veh running Exp.					
f-22	Water charges					
f-23	Workshop & Conf. Exp.					
	Sub Total (Administrative Expenses)					
3	Security					
4	Donations					
5	Provisions					
6	Depreciation					
7	Prior period expenses					
8	Total Expenses from 1-7					
	Less Recoveries (if any)					
9	Expenses related to Operation - D					
	ALLOCATION TO OPERATIONAL STATIONS					

DETAILS OF CORPORATE CENTRE EXPENSES ALLOCATED TO VARIOUS OPERATING STATIONS						
	<i>Amount (₹ in lakh)</i>					
	PARTICULARS/YEAR	2019-20	2020-21	2021-22	2022-23	2023-24
S.No	Name of The Unit/Station					
	Operational Station (1)					
	Operational Station (2)					

FORMAT FOR CLAIMING WAGE REVISION IMPACT

YEARWISE IMPACT OF REVISION IN SALARIES & WAGES PAID TO THE EMPLOYEES AND SECURITY PERSONNEL

Wage revision impact on employee cost of generating station

Amount (₹ in lakh)

Component	2019-20						2023-24		
	Pre Revised	Post Revision	Wage revision Impact	Pre Revised	Post Revision	Wage revision Impact	Pre Revised	Post Revision	Wage revision Impact
1.1 Basic Pay									
1.2 Dearness Allowance									
1.3 HRA									
1.4 Allowances & Perquisites									
1.5 PRP/Ex Gratia									
2.1 Super Annuation Benefits (PF, Pension & PRMS)									
2.2 Gratuity									
2.3 Leave encashment (HPL/EL)									
Total									
Less: EDC									
Net employee cost									

Wage revision impact on Corporate Centre cost of generating station

Amount (₹ in lakh)

Component	2019-20						2023-24		
	Pre Revised	Post Revision	Wage revision Impact	Pre Revised	Post Revision	Wage revision Impact	Pre Revised	Post Revision	Wage revision Impact
CC Expenses									
1.1 Basic Pay									
1.2 Dearness Allowance									
1.3 HRA									
1.4 Allowances & Perquisites									
1.5 PRP/Ex Gratia									
Total									

Wage revision Impact on Salaries of CISF & Other Security
Personnel (if applicable)

Amount (₹ in lakh)

Component	2019-20						2023-24		
	Pre Revised	Post Revision	Wage revision Impact	Pre Revised	Post Revision	Wage revision Impact	Pre Revised	Post Revision	Wage revision Impact
1.CISF									
2. Others									
Total									
Total Wage revision Impact									