

**BEFORE THE HON'BLE
TAMIL NADU ELECTRICITY REGULATORY
COMMISSION, CHENNAI**



**PETITION FOR
TRUE-UP OF ARR FOR FY 2023-24**

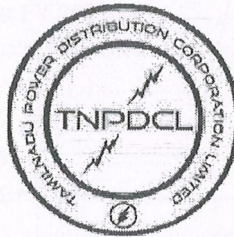
**FOR
TAMILNADU GENERATION AND DISTRIBUTION CORPORATION
LIMITED (TANGEDCO)**

**UNDER TNERC (TERMS AND CONDITIONS FOR DETERMINATION
OF TARIFF) REGULATIONS, 2005 AND TNERC (MULTI YEAR
TARIFF FRAMEWORK) REGULATIONS, 2009 AMENDED FROM
TIME TO TIME**

&

**UNDER PART VII (SECTION 61 TO SECTION 64) OF THE
ELECTRICITY ACT, 2003 READ WITH THE RELEVANT
GUIDELINES**

FILED BY



**TAMIL NADU POWER DISTRIBUTION CORPORATION
LIMITED**

MARCH 2025



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List of Abbreviations

Sr. No	Abbreviations	Descriptions
1.	A&G	Administrative and General
2.	ARR	Aggregate Revenue Requirement
3.	APR	Annual Performance Review
4.	BBGTPS	Basin Bridge Gas Turbine Power Station
5.	CAPEX	Capital Expenditure
6.	CERC	Central Electricity Regulatory Commission
7.	CGS	Central Generating Stations
8.	COS	Cost of Supply
9.	CPPs	Captive Power Plants
10.	Crs	Crore
11.	CSD	Consumer Security Deposit
12.	Discom	Distribution Companies
13.	ECL	Eastern Coal Fields Ltd
14.	FY	Financial Year
15.	GFA	Gross Fixed Assets
16.	G.O.	Government Order
17.	GoTN	Government of Tamil Nadu
18.	HT	High Tension
19.	HEP	Hydro Electric Power
20.	IGAAP	Indian Generally Accepted Accounting Principles
21.	IND AS	Indian Accounting Standards
22.	IPP	Independent Power Projects
23.	KGTPS	Kuttalam Gas Turbine Power Station
24.	kVAh	Kilo Volt Ampere Hour
25.	kW	Kilo Watt
26.	kWh	Kilo Watt Hour
27.	LT	Low Tension
28.	LTOA	Long Term Open Access
29.	MCL	Mahanadi Coal Fields Ltd
30.	MOD	Merit Order Despatch
31.	MOU	Memorandum of Understanding
32.	MTPS	Mettur Thermal Power Station I
33.	MTPS II	Mettur Thermal Power Station II
34.	MTOA	Medium Term Open Access
35.	MU	Million Units (Million kWh)
36.	MVA	Mega Volt Ampere
37.	MW	Mega Watt
38.	MYT	Multi Year Tariff
39.	NCTPS I	North Chennai Thermal Power Station I
40.	NCTPS II	North Chennai Thermal Power Station II
41.	NCTPS III	North Chennai Thermal Power Station III



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Sr. No	Abbreviations	Descriptions
42.	NLC	NLC India Ltd.
43.	NTP	National Tariff Policy
44.	NTPC	National Thermal Power Corporation
45.	O&M	Operation & Maintenance
46.	PAF	Plant Availability Factor
47.	PFC	Power finance Corporation
48.	PLF	Plant Load Factor
49.	PP Cost	Power Purchase Cost
50.	R&M	Repair and Maintenance
51.	ROE	Return on Equity
52.	RPO	Renewable Purchase Obligation
53.	Rs	Rupees
54.	SBI	State Bank of India
55.	SECL	South-eastern Coalfields Limited
56.	SHR	Station Heat Rate
57.	SLDC	State Load Despatch Centre
58.	STOA	Short Term Open Access
59.	TANGEDCO	Tamil Nadu Generation and Distribution Corporation Limited
60.	TANTRANSCO	Tamil Nadu Transmission Corporation Limited
61.	TOD	Time of Day
62.	TKGTPS	Tirumakottai Gas Turbine Power Station
63.	TNEB	Tamil Nadu Electricity Board
64.	TNERC	Tamil Nadu Electricity Regulatory Commission
65.	TNGECL	Tamil Nadu Green Energy Corporation Limited
66.	TNPDCCL	Tamil Nadu Power Distribution Corporation Limited
67.	TNPGCL	Tamil Nadu Power Generation Corporation Limited
68.	TTPS	Tuticorin Thermal Power Station
69.	T&D	Transmission and Distribution
70.	VGTPS	Valuthur Gas Turbine Power Station
71.	WCL	Western Coalfields Limited



1. OVERVIEW OF TANGEDCO

1.1 Preamble

This section presents the background and reasons for filing of this Petition.

1.2 Background

- 1.2.1 Tamil Nadu Electricity Board (TNEB) came into existence on 1st July 1957 under the repealed Act of Electricity (Supply) Act 1948 and has been in the business of generation, transmission and distribution of electricity in the State of Tamil Nadu.
- 1.2.2 In line with the Electricity Act 2003, Sections 131 to 134 mandates reorganisation of the State Electricity Boards into functional entities and corporatisation of the same. Therefore, in order to meet the requirements under the Act, the Government of Tamil Nadu (GoTN) and the Tamil Nadu Electricity Board (TNEB) proposed to restructure the state power sector.
- 1.2.3 In accordance with the above mandate the Government of Tamil Nadu (GoTN) had given in- principle approval for the re-organization of TNEB by establishing a holding company, named TNEB Ltd and two subsidiary companies, namely **Tamil Nadu Transmission Corporation Limited (TANTRANSCO)** and **Tamil Nadu Generation and Distribution Corporation Limited (TANGEDCO)** vide G.O.Ms.No.114 Energy (B2) Department dated 8th October 2008 with the stipulation that the aforementioned companies shall be fully owned by Government.
- 1.2.4 Based on the approval of Memorandum of Association and Articles of Association of TANGEDCO and TNEB Limited by the Government of Tamil Nadu vide G.O.Ms.No.94 Energy (B2) Department dated 16th Nov 2009, Tamil Nadu Generation and Distribution Corporation Limited (TANGEDCO) and TNEB Limited was incorporated on 1st Dec 2009 with an authorized share capital of Rs. 5.00 Crore and paid-up capital of Rs. 5.00 Lakhs each for TANGEDCO and TNEB Limited. The Certificates of commencement of business have been obtained for the TANGEDCO on 16th March 2010 and for TNEB Ltd on 12th March 2010 respectively.
- 1.2.5 The proposal for Assets Transfer and Employee transfer called as Tamil Nadu Electricity Board (Reorganization and Reforms) Transfer Scheme 2010 has been notified by Government of Tamil Nadu vide G.O. (Ms). No. 100 Energy (B2) Department dated 19th October 2010 with the effective date of implementation as 1st November 2010. Based on the above notification TNEB has been re-organized from 1st November 2010.
- 1.2.6 As per the Transfer Scheme the provisional period for transfer of Assets is 1 year and for transfer of employees is 3 years. From 1st November 2010 onwards all the employees of the erstwhile TNEB shall stand transferred to and absorbed in TANGEDCO on a provisional basis and assigned to the services of the relevant transferee.
- 1.2.7 Post restructuring, TANGEDCO as per the notification, was provided with the functions of generation and distribution of electricity in the State of Tamil Nadu.



- 1.2.8 TANGEDCO as the State Generation and Distribution Utility is entrusted with the duty of generating power and distribution of the same to the end consumers through its generating stations and vast distribution network.

1.3 Final Transfer Scheme

- 1.3.1 The accumulated losses of erstwhile TNEB to an extent of Rs. 34,741.35 Crore has been adjusted in the Final Transfer Scheme notified vide G.O. M.S No. 49 dated 13th August 2015, by revaluation of assets to an extent of Rs. 54,658.71 Crore and the excess revaluation reserve of Rs. 12,265.99 Crore, Rs. 7,163.58 Crore and Rs. 487.79 Crore transferred to TANGEDCO, TANTRANSCO and TNEB Ltd., respectively. Through the notification of final transfer scheme, the Government of Tamil Nadu has assigned the Assets and Liabilities (as on 31st October 2010) to TANGEDCO on final basis.

1.4 Need for Further Restructuring:

- 1.4.1 The need to complete the restructuring process in Tamil Nadu by unbundling of TANGEDCO is further emphasized by the following

1.4.2 **Unbundling is complete in most of the States:**

Nearly all the major States have already aligned the business structure with the power sector value chain by having separate companies in the area of Generation, Transmission and Distribution. States like Odisha, Haryana, Rajasthan, Andhra Pradesh, Madhya Pradesh, and Uttar Pradesh unbundled their electricity boards and created multiple distribution licensees. States like West Bengal, Maharashtra and Chhattisgarh formed a single distribution utility model to restructure themselves.

1.4.3 **Large scale of operation of TANGEDCO:**

TANGEDCO's scale of business is currently among the top 5 States in the country (considering generation and distribution together).

- Ranks third in Revenue from Operations (1st – Maharashtra, 2nd – Uttar Pradesh)
- Ranks fourth in terms of total gross energy sold (1st Maharashtra, 2nd – Uttar Pradesh, 3rd – Gujarat)

- 1.4.4 It would hence be an operational relief, if the generation and distribution business are carved out in separate companies with dedicated management to steer their respective businesses.

1.4.5 **Need to align with new age power sector dynamics:**

The power sector is currently going through a paradigm shift with multiple disruptions across the value chain. Most of these disruptions focus on clean energy transition which requires traditional utilities to restructure their business operations to maximize value and minimize environment impact.

1.4.6 **Advantages of restructuring:**

- **Better Governance** – The establishment of a separate Board Structure of the independent companies shall enable better governance of the state power sector. It shall also empower the companies to take decisions more independently.



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- **Operational efficiency** – A separate generation company will strive to be more efficient to withstand competition from other GENCOs.
- The formation of Green Company shall not only be helpful to fast track the State's energy transition plans but can also give access to green funds which shall help ease liquidity concerns and reduce the overall borrowing cost of the state power sector.

1.4.7 In view of the above mentioned points, the Additional Chief Secretary / Chairman and Managing Director, Tamil Nadu Generation and Distribution Corporation has stated that it may be apt to complete the unbundling process and leverage the unbundling to better prepare to manage the sector disruptions.

1.5 Companies Formed

1.5.1 The Energy Department, Govt of Tamil Nadu has vide G.O (Ms) No. 6 dated 24th January 2024 and vide G.O (Ms) No. 7 dated 24th January 2024 accorded in principle approval for restructuring of Tamil Nadu Generation and Distribution Corporation Limited ("TANGEDCO") into separate generation and distribution companies and formation of two new companies –

- Thermal generation company [**Tamil Nadu Power Generation Corporation Limited (TNPGL)**] to take over the fossil fuel (coal and gas) related generation business of TANGEDCO.
- Green Energy Company [**Tamil Nadu Green Energy Corporation Limited (TNGECL)**] to take over the renewable business of TANGEDCO.
- The distribution function of TANGEDCO shall be taken over by [**Tamil Nadu Power Distribution Corporation Limited (TNPDCCL)**] post formation of TNPGL and TNGECL.

1.5.2 Based on the above notifications, TNPGL has been incorporated on 09.02.2024 and TNGECL has been incorporated on 10.02.2024.

1.6 Functions of TNPGL

Key functions of the company will be -

- 1.6.1 Operations of existing assets - Responsible for operation, maintenance of existing thermal and gas-based power plants of State Government.
- 1.6.2 Monitoring of under construction power plants: Responsible for timely completion of construction works of under construction thermal power plants under the State Government.

- Fuel Procurement and Management: Secure sourcing, handling, and management of fuels (coal, natural gas, or oil) for power generation.
- Renovation and modernisation - Undertaking renovation and modernisation investments, annual overhauls, residual life assessment for extension of life of existing plants.



- Emission Control and Compliance: Implement technologies and processes to manage emissions, ensuring adherence to environmental regulations and reducing environmental impact.
- 1.6.3 Maintenance and Safety: Conduct regular maintenance, ensure operational safety, and uphold workforce well-being while optimizing plant efficiency.
- Resource Management: Effective management of resources, such as fuel reserves, water usage, and waste disposal, for sustainable operation of the plants.
- Regulatory compliance: Compliance to regulatory provisions as per Electricity Act, 2003 and mandates as per TNERC.
- Coordination with State Transco and Discom on power supply matters, development of off take infrastructure.

1.7 Functions of TNGECL

Key functions of the company will be –

- 1.7.1 Will own, operate and maintain all existing and upcoming assets related to Hydro-generation, Pumped-Hydro and all clean and renewable energy projects.
- Responsible for enhancing clean energy footprint of the state/decarbonization of electricity grids.
- 1.7.2 Conceptualizing pilots and commercial scale projects across sun rise technologies like Green Hydrogen, Off shore wind, Waste to Energy, geo thermal, wave to energy, pumped hydro, battery storage, etc.,
- Single window clearance to Developers.
- Technology and skill tie ups with national and international players.
- Resource and potential assessment in the state.
- Procurement/Development/Construction and O&M of Green Energy Projects.
- Coordination with Transmission and Distribution utility for RE Power off take, consumption and RE integration.
- Grid Integration and Energy Storage: Integrate renewable energy into the existing power grid and implement energy storage solutions like batteries to ensure stable and consistent power supply.
- 1.7.3 Environmental Sustainability and Compliance: Maintain environmentally responsible practices, manage ecological impacts and adhere to regulatory standards while striving to minimize the carbon footprint associated with energy production.
- Renovation and modernization - Undertaking renovation and modernization investments, annual overhauls, residual life assessment for extension of life of existing plants.
- 1.7.4 Maintenance and Safety: Conduct regular maintenance, ensure operational safety and uphold workforce well-being while optimizing plant efficiency.
- Regulatory compliance: Compliance to regulatory provisions as per Electricity Act, 2003 and mandates as per Tamil Nadu Electricity Regulatory Commission.



1.8 Functions of TNPDCCL

Key functions of Tamil Nadu Power Distribution Corporation Limited will be –

- Distribution of Electricity across the State.
- Power procurement to cater to the electricity needs of the State and bridging the demand supply gap.
- 1.8.1 Achieving 100% electrification and timely effecting of new electricity connections.
- 1.8.2 Planning, Construction and O&M of medium voltage and low voltage, lines and associated sub-stations infrastructure for safe and reliable distribution of Electricity and its upgradation.
- 1.8.3 Infrastructure Maintenance: Maintain and manage the distribution infrastructure including substations, transformers, power lines and meters to prevent disruptions and ensure optimal performance.
- 1.8.4 Outage Management: Detect, respond to and resolve power outages efficiently, minimizing downtime and communicating outage information to customers.
 - Customer Support: Provide responsive customer service, handling inquiries, billing issues and service requests related to power supply and distribution and complaint resolution.
 - Metering and Billing: Install, read and manage electricity meters, accurately measuring consumption and generating bills for customers based on their usage.
 - Revenue collection from consumers for sale of electricity.
 - Compliance to regulatory provisions and guidelines as per the Electricity Act, 2003 and the Hon'ble Tamil Nadu Electricity Regulatory Commission mandates.
 - Coordination with State GENCO and Transco for power supply and transmission to distribution grids.
- 1.8.5 Comply with the SLDC directions.
 - Implementing energy efficiency initiatives
 - Coordinating with State Government for Subsidy requirements.

1.9 Restructuring of TANGEDCO

- 1.9.1 The TAMIL NADU ELECTRICITY RESTRUCTURING AND TRANSFER SCHEME, 2024 vide G.O. Ms. No. 32, Energy (B2), 6th March 2024, In exercise of the powers conferred by sub-sections (4), (5) and (6) of section 131 and section 133 of the Electricity Act, 2003 (Central Act 36 of 2003), the Government of Tamil Nadu hereby makes the following Scheme for defining the property, interest in property, rights and liabilities of the Tamil Nadu Generation and Distribution Corporation Limited (TANGEDCO) to be allocated to the **Tamil Nadu Power Generation Corporation Limited (TNPGL), Tamil Nadu Green Energy Corporation Limited (TNGECL) and Tamil Nadu Power Distribution Corporation Limited (TNPDCCL).**



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- 1.9.2 Further, the Registrar of Companies/ Ministry of Corporate Affairs has also approved the name change Tamil Nadu Generation and Distribution Corporation Limited (TANGEDCO) into Tamil Nadu Power Distribution Corporation Limited on 27.06.2024.

1.10 Effectiveness of Transfer Scheme

- 1.10.1 Though 01.04.2023 was notified as the Appointed Date vide G.O. Ms 84 dt. 28.08.2024, the same was subsequently amended as 01.04.2024 vide G.O. Ms No. 124 dt. 24.12.2024. Hence the maintenance of the books of accounts and booking of income and expenditure in the three companies was separately undertaken from 01.04.2024 onwards.



2. OVERALL APPROACH FOR PRESENT FILING

2.1 Present Approach

- 2.1.1 The Hon'ble Commission on 3rd August 2005 notified the TNERC (Terms and Conditions for Determination of Tariff) Regulations, 2005. In the said Regulation, the Commission specified that the licensee has to file the Aggregate Revenue Requirement (ARR) for each year in the format prescribed, containing the details of the expected aggregate revenue that the licensee is permitted to recover at the prevailing tariff and the estimated expenditure. In line with the same, TNPdCL erstwhile TANGEDCO is filing its ARR for consideration of the Hon'ble Commission in the formats laid down for providing information relating to past, current and future performance.
- 2.1.2 Further, as per TNERC (Terms and Conditions for Determination of Tariff) Regulations, 2005 the application for determination of tariff for the existing Generating Stations and distribution business shall be accompanied by information in the formats provided by the Hon'ble Commission for the previous years, current year and ensuing years which are part of the control period as specified in the MYT Regulations. Thus, TANGEDCO is filing the petition for True-up for the generation and distribution business.
- 2.1.3 As per the Amendment to Tamil Nadu Electricity Regulatory Commission Terms and conditions for determination of tariff for intra state transmission / Distribution of Electricity under MYT framework Regulations 2009 dated 05th November 2022, the control period is defined as:
- "(i) Control Period: The control period under the MYT framework shall be for duration of 5 years. The year preceding the first year of the control period shall be the base year."*
- 2.1.4 TANGEDCO had filed the ARR Petition including Truing Up of Tariff for FY 2016-17 to FY 2020-21, APR for FY 2021-22 and ARR for FY 2022-23 to FY 2026-27. The Hon'ble Commission vide its Order dated 9th September 2022, has approved the truing up from FY 2016-17 to FY 2020-21 and Annual Performance Review of FY 2021-22 was approved further, Aggregate Revenue Requirement and determination of Tariff for FY 2022-23 to FY 2026-27 was approved.
- 2.1.5 TANGEDCO filed the true up petition for FY 2021-22 on 31st March 2023 based on IGAAP certified Audited Accounts. Later, TANGEDCO filed an additional affidavit for true up as per data based on IND AS and requested to approve the true-up for the same. After obtaining stakeholders' comments and replies from TANGEDCO, the Hon'ble Commission issued order on 28th March 2024.
- 2.1.6 The Board of TANGEDCO in its 14th Annual General Meeting dated 30th December 2023 has approved and adopted the audited Balance Sheet as at 31st March 2023 and Profit and Loss Account for FY 2022-23 along with Director's Report, Statutory Auditor's Report, Secretarial Report and CAG's Report and management replies thereon. TANGEDCO filed the true-up petition for FY 2022-23 on 15.03.2024 based on the audited accounts. After obtaining stakeholder's comments and respective



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replies from TANGEDCO, the Hon'ble Commission notified the order on 13.08.2024.

- 2.1.7 This current petition is filed by TNPDC erstwhile TANGEDCO for truing up of ARR for FY 2023-24 based on the IND AS Audited accounts on a consolidated basis, as the audited financial statements of TNGECL, TNPGL, and TNPDC are combined for FY 2023-24.

2.2 Reason for Delay for filing of Petition

- 2.2.1 TNPDC erstwhile TANGEDCO submits that the finalization of Annual Accounts for the FY 2023-24 was delayed due to bifurcation of TANGEDCO and time extension was obtained till December 2024 for filing the Annual Accounts to Ministry of Company Affairs. The AG certification of accounts (combined balance sheet for TNPDC, TNPGL & TNGECL) for FY 2023-24 was completed only on 31.12.2024.
- 2.2.2 Further TNPDC filed a miscellaneous petition with a prayer "To grant six weeks time extension for filing True-up of ARR for FY 2023-24 along with Mid Term Review Petition for the remaining control period." The petition was admitted and numbered as M.P.No.54 of 2024 and order was reserved on 17.12.24.
- 2.2.3 It is now proposed to submit the true-up petition for the FY 2023-24 alone before the Hon'ble Commission along with condonation for delay of 94 days. The preparation of Mid Term Review Petition is under progress for TNPDC, TNPGL and TNGECL. The final transfer scheme is currently under progress. In relation to that, the Mid Term Review (MTR) for three companies will be filed separately.

2.3 Data/Information for True-Up

- 2.3.1 This petition contains the truing-up of the ARR of FY 2023-24 figures which are based upon the Audited Annual Accounts submitted to the Hon'ble Commission.
- 2.3.2 The ARR indicated in the given petition, is exclusive of Foreign Exchange Rate Variation (if applicable), any statutory taxes, levies, duties, cess, filing fees or any other kind of imposition(s) and/ or other surcharges etc., whatsoever imposed/ charged by any Government (Central/State) and/ or any other local bodies/authorities/regulatory authorities in relation to generation and distribution of electricity, environmental protection and/ or in respect of any of its installation associated with the Generation and Distribution system and the same shall be allowed to be claimed by the Applicant in future as and when such claims are made.

2.4 Regulatory Framework

- 2.4.1 TNPDC erstwhile TANGEDCO has considered the norms as specified by TNERC Tariff Regulations 2005, TNERC MYT Regulations, 2009 and its subsequent amendments. However certain deviations have been considered with justifications for the purpose of this petition and it is requested to approve the same.



2.5 Summary of Assumptions

- a. The figures mentioned in each of the Tables are the amount in **Rs. Crore** unless otherwise specified.
- b. TNPDCCL erstwhile TANGEDCO submits that there has been no cost of generation (variable as well as fixed) considered for own wind generating stations, i.e., Tirunelveli Wind and Udumalpet wind farms. However, the net-generation due to these windmills has been considered in Energy Availability.



3. TRUE UP OF FY 2023-24

3.1 Preamble

- 3.1.1 This section outlines the performance of all the generating stations and distribution business for FY 2023-24. TNPDC erstwhile TANGEDCO hereby submits Truing-Up of FY 2023-24 based on audited accounts for FY 2023-24 which was directly prepared based on the IND AS principles.

3.2 Principles for Truing Up of FY 2023-24

- 3.2.1 A comparison of figures approved by the Hon'ble Commission vide Tariff Order No. 7 of 2022 in T.P. No. 1 of 2022 dated 9th September 2022 and actual expenditure based on audited accounts for FY 2023-24 is shown in the Table under relevant sections discussed herein.

3.3 Operational Performance Parameters – Generation

- 3.3.1 TANGEDCO has been restructured into three different entities and the functions of the newly formed entities are mentioned above. TNPDC erstwhile TANGEDCO submits that this section outlines actual operational performance parameters of generation function which are taken up by TNGECL and TNPGL in order to derive variable cost of own generation, as compared to that approved by the Hon'ble Commission in tariff order dated 9th September, 2022.
- 3.3.2 The operational parameters like Plant Availability Factor (PAF), Plant Load Factor (PLF) Station Heat Rate (SHR), Auxiliary Energy Consumption (AEC)/Auxiliary Consumption (AC), Specific Oil Consumption, etc. achieved during FY 2023-24 have been discussed in detail in subsequent section. For the purpose of examination of performance of TNGECL and TNPGL, comparison has been made between values approved by the Hon'ble Commission with the actual values achieved. The reasons for deviations for operational parameters if any, have been discussed in the respective section.
- 3.3.3 The actual operating parameters derived during the respective years are dependent of present condition of the machine. The present operating conditions of the machine is a function of following factors.
- ✓ Operation and Maintenance carried out in the plant since commissioning
 - ✓ Degradation due to ageing
 - ✓ Water Chemistry
 - ✓ Conditions of the Auxiliaries
 - ✓ Overloading and Partial Loading of machines
 - ✓ Number of Start/Stop
 - ✓ Temperatures and Pressures Stress-Machines have been subjected to
 - ✓ Automation of C&I
 - ✓ Condenser Vacuum



3.3.4 Reasons for deviation of Actual Operational Parameters from Norms:

a) Ageing

- ✓ It is to be submitted that most of the existing generating station of TNPCL are very old and of obsolete technology. There are frequent boiler tube failures due to erosion in the old, aged machines, which may be caused due to degradation of boiler water walls or by quality of coal and other constraints. The degradation of machines due to ageing induces high vibrations, high bearing temperature and also affects the heat transfer capacity due to various reasons. This results in failure of the respective auxiliaries and causes deterioration in the actual performance. Further, due to low load/partial load operation on account of grid constraints which are beyond the control of TNPCL, the Auxiliary Consumption are affected. The above constraints are generally observed in older machines mainly and newer machine minimally get affected by such reasons. Hence, their performance is found near to or at par with the normative values.

b) Design Constraints

- ✓ It is submitted that the operational performance parameters for generating stations defined by the Hon'ble Commission in TNERC (Terms and Conditions of Tariff) Regulations, 2005 are based on the norms specified in CERC Tariff Regulations, which in turn are based on design specifications of NTPC Power Plants. Most of the NTPC power plants has a bigger unit size of 500 MW due to which they probably achieve target performance parameters as specified in the CERC Tariff Regulations.
- ✓ However, most of the existing plants of TNPCL has smaller unit size, as compared to NTPC plants. Due to this, their performance cannot be comparable to 500 MW unit size plants of NTPC. The units being old and smaller in size vis-à-vis NTPC plants, it becomes very difficult to achieve the target performance parameters as specified in the TNERC Tariff Regulations, 2005. It is therefore submitted that the actual performance parameters as submitted in the present petition may kindly be approved.

c) Operational Constraints

- ✓ Based on deemed PLF (arrived after considered backing down units), some of the generating stations were available at a level above the normative. Further, it is to be submitted that the backing down instructions from SLDC/System are beyond the control of TNPCL. It is therefore requested to consider the actual PLF achieved by TNPCL plants over the respective period.
- ✓ Also, with the increase in frequency of backing down, number of start and stop operation also increases proportionately, which not only result in slightly higher consumption of fuels but also affect the operational efficiency of plants.
- ✓ Further, even under the backed down mode, there are certain auxiliaries which are required to run at part load as well as full load, this leads to higher auxiliary consumption for the reduced generation or no generation.
- ✓ The efficiency of boiler as well as turbine deteriorate with the decrease in loading of the plant, thus results in higher SHR leading to overall inefficiency.
- ✓ Backing down not only affects the operational life of plants but also increases the



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repair and maintenance expenses.

- ✓ Apart from above, many of TNPGL plants utilises domestic coal which has high ash content and low GCV.

3.4 Plant Availability Factor (PAF)

- 3.4.1 The following Table shows the Plant Availability Factor (PAF) achieved by TNPGL and TNGECL during FY 2023-24.

Table 1: Plant Availability Factor during FY 2023-24

S.No.	Power Station	True Up
Thermal Power Generating Stations		
1	Tuticorin TPS	79.82%
2	Mettur TPS I	90.20%
3	NCTPS I	71.62%
4	NCTPS II	61.37%
5	Mettur TPS II	78.23%
Gas Power Generating Stations		
6	Tirumakottai GTPS	89.69%
7	Kuttalam GTPS	97.03%
8	Basin Bridge GTPS	84.93%
9	Valuthur GTPS	88.69%
Hydro Power Generating Stations		
10	Erode HEP	81.98%
11	Kadamparai HEP	75.28%
12	Kundah HEP	92.16%
13	Tirunelveli HEP	73.64%

- 3.4.2 TNPDCCL erstwhile TANGEDCO submits that Tuticorin TPS witnessed rainfall in excess of 50 cm in 24 hours on 18.12.2024 alone. The North East Monsoon seasonal rainfall of December 2023 turned into an unprecedented downpour on 17.12.2023 and 18.12.2023. Tuticorin witnessed a rainfall in excess of 50 cm in 24 hours on 18.12.2023 alone. Korampallam tank in Thoothukudi has suffered a breach. The torrential rain combined with the tank breach leading to flash floods and stagnation of water inside TTPS campus. The relentless rainfall and floods have plunged Tuticorin Thermal Power Station into a severe crisis. This natural calamity has caused catastrophic damage to the plant.
- 3.4.3 Due to the natural calamity ash slurry was heavily accumulated into the open/close channel, forebay area of cooling water intake channel –I & II due to breaching of Ash slurry from the adjacent high level peripheral bund of ash dyke. It caused complete stoppage of cooling water to the condensers. Also, flood water entered into the Cooling Water Pump house I & II, Auxiliary Cooling Water Pump house, Heat Exchanger Booster Pump house, Clarified Water Pump house and got immersed in flood water.
- 3.4.4 Therefore, Hon'ble Commission is requested to consider the above force majeure



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condition and approve the PAF and allow the fixed cost without any restriction.

3.5 Plant Load Factor (PLF)

3.5.1 The following Table shows the Plant Load Factor (PLF) as approved by the Hon'ble Commission vis-à-vis the actual Plant Load Factor achieved by TNPGL and TNGECL generating stations during FY 2023-24.

Table 2: Plant Load Factor for FY 2023-24

S. No.	Power Station	FY 2023-24	
		Approved	True Up
Thermal Power Generating Stations			
1	Tuticorin TPS	55.00%	70.31%
2	Mettur TPS I	70.00%	78.68%
3	NCTPS I	65.00%	65.35%
4	NCTPS II	60.00%	60.43%
5	Mettur TPS II	60.00%	60.76%
Gas Power Generating Stations			
6	Tirumakottai GTPS	30.00%	14.96%
7	Kuttalam GTPS	45.00%	78.29%
8	Basin Bridge GTPS	0.60%	0.00%
9	Valuthur GTPS	70.00%	71.56%
Hydro Power Generating Stations			
10	Erode IIEP	25.46%	14.40%
11	Kadamparai HEP	16.46%	9.70%
12	Kundali HEP	30.56%	24.06%
13	Tirunelveli HEP	35.00%	23.95%

3.5.2 Reasons for low PLF:

3.5.2.1 Thermal:

- TNPDCCL erstwhile TANGEDCO submits that all thermal stations operated by TNPGL have been able to successfully achieve the PLF approved by the Hon'ble Commission.

3.5.2.2 Shortage of gas:

- Due to the inadequate supply of gas, Tirumakottai has achieved PLF of 14.96% only. However, all other gas power generating stations were able to achieve the target PLF as approved by the commission for FY 2023-24.

Hydro Power PLF:

- TNPDCCL erstwhile TANGEDCO would like to inform that the operations and management of all hydro power plants have been transferred to TNGECL following the restructuring process. It is submitted that out of total 47 Hydro



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Power Houses (PHs) of TNGECL, 29 PHs are irrigation-based Hydro PHs and remaining 18 PHs are non-irrigation based PHs. Generally, all the hydro stations are operated based on the instructions of Load Dispatch Centre to meet out peak demand & according to the requirement to maintain grid stability and balancing Power to integrate other renewable sources, viz., Solar and wind power. Irrigation Based Hydro Stations are operated based on PWD Demand and non-irrigation-based Hydro Stations are operated based on Grid Demand and reservoir level which in turn depends on monsoon rains. Despite shortfall in monsoon rainfall, TNGECL was able to achieve the PLF as shown above.

3.5.2.3 TNPDCCL erstwhile TANGEDCO requests Hon'ble Commission to approve the actual Plant Availability Factor (PAF) and Plant Load Factor (PLF) attained by TNPGL and TNGECL as mentioned in the table above.

3.6 Auxiliary Consumption

3.6.1 The following Table shows the actual Auxiliary Energy Consumption (AEC) for various generating stations of TNPGL and TNGECL vis-à-vis normative auxiliary energy consumption as approved by the Hon'ble Commission vide its Tariff Order No.7 of 2022 in T.P. No. 1 of 2022 dated 09 September 2022 for FY 2023-24.

Table 3: Auxiliary Consumption(%) for FY 2023-24

S. No.	Power Station	FY 2023-24	
		Approved	True Up
Thermal Generating Stations:			
1	Tuticorin TPS	8.50%	9.00%
2	Mettur TPS I	8.50%	9.04%
3	NCTPS I	8.50%	10.11%
4	NCTPS II	7.00%	7.17%
5	Mettur TPS II	7.00%	7.60%
Gas Power Generating Stations:			
6	Tirumakottai GTPS	6.00%	26.55%
7	Kuttalam GTPS	6.00%	6.45%
8	Basin Bridge GTPS	0.99%	0.00%
9	Valuthur GTPS	6.00%	6.27%
Hydro Power Generating Stations:			
10	Erode HEP	0.50%	0.87%
11	Kadamparai HEP	0.50%	0.49%
12	Kundah HEP	0.50%	0.39%
13	Tirunelveli HEP	0.50%	0.40%

3.6.2 During FY 2023-24, because of frequent backing downs/reserved outages and low load operations, the actual AEC is higher than the approved norms for Thermal power plants.

3.6.3 With respect to Gas Power Stations, the actual AEC of all Stations are higher than the approved norms mainly on account of part load operation of stations due to



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inadequate supply of gas during the respective period. As already mentioned, that even though the plants are operated in part load, there are certain auxiliaries that are required to be run at part load or full load in order to bring the Units back as per system demand. This results in increased auxiliary consumption for lower generation. Therefore, its auxiliary consumptions vary as per system demand.

- 3.6.4 In FY 2023-24, Kadamparai HEP, Kundah HEP and Tirunelveli HEP has been able to operate the hydro plants efficiently despite of low PLF and have maintain the AEC within the normative approved AEC.
- 3.6.5 However, due to frequent backing downs/reserved outages, low load operations and plant to be shut down due to irrigation water supply, the actual AEC is higher than the approved norms for Erode HEP.
- 3.6.6 TNPDCCL erstwhile TANGEDCO requests the Hon'ble Commission to consider the actual auxiliary energy consumption as provided in the Table above.

3.7 Station Heat Rate (SHR)

- 3.7.1 The following table provides the actual SHR of various generating stations of TNPGL vis-à-vis SHR approved by the Hon'ble Commission in its previous Tariff Order for FY 2023-24.

Table 4: Station Heat Rate (kCal/kWh) for FY 2023-24

S. No.	Power Station	FY 2023-24	
		Approved	True Up
Thermal Power Generating Stations			
1	Tuticorin TPS	2600	2577
2	Mettur TPS I	2600	2,551
3	NCTPS I	2489	2641
4	NCTPS II	2597	2,548
5	Mettur TPS II	2597	2,519
Gas Power Generating Stations			
6	Tirumakottai GTPS	1850	4,462
7	Kuttalam GTPS	1850	2,046
8	Basin Bridge GTPS	4399	0
9	Valuthur GTPS	1850	2,119

3.7.2 Reasons for deviation:

- ✓ All the thermal stations are operated within the norms approved by the Hon'ble Commission except NCTPS I. The major factor contributing to higher SHR is frequent part load operations.
- ✓ **Tirumakottai GTPS:** Due to low availability of gas, the Plant was operated at part load. This has resulted into SHR significantly higher than the approved.
- ✓ **Valuthur Unit I and II GTPS:** The SHR of Valuthur GTPS has increased due to operation at part load. Units were operated at part load due to non-availability of gas.



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3.7.3 TNPDCCL erstwhile TANGEDCO requests Hon'ble Commission to approve the actual Station heat rate achieved by TNPGL Thermal and Gas Power Plants.

3.8 Specific Fuel Oil Consumption

3.8.1 The Table given below shows the approved vis-à-vis actual specific oil consumption achieved by TNPGL's generating stations during FY 2023-24

Table 5: Specific Fuel Oil Consumption (ml/kWh) for FY 2023-24

S. No.	Power Station	FY 2023-24	
		Approved	True Up
1	Tuticorin TPS	1.67	0.95
2	Mettur TPS I	0.69	0.48
3	NCTPS I	1.79	1.04
4	NCTPS II	1.10	0.77
5	Mettur TPS II	0.88	0.53

3.8.2 As submitted in the sections earlier, Specific Oil Consumption is calculated in terms of percentage of total calorific requirement of the power generating unit and has relation with the size of the generating unit.

3.8.3 For the smaller units, Specific Oil Consumption remains higher as compared to larger power generating units, because of minimal oil consumption required irrespective of the size of the generating unit. Further, the Specific Oil Consumption of all the above generating stations are within the norms.

3.9 Fuel Related Parameters

3.9.1 The Table below summaries actual value of weighted average Gross Calorific Value (GCV) of primary fuels recorded by TNPGL during FY 2023-24 along with the approved GCV for primary fuel as per previous Tariff Order.

Table 6: Gross Calorific Value-Thermal and Gas Stations for FY 2023-24

S. No.	Power Station	FY 2023-24	
		Approved	True Up
Thermal Power Generating Stations (kCal/kg):			
1	Tuticorin TPS	3,124	2,885
2	Mettur TPS I	3,162	3,083
3	NCTPS I	3,253	3,048
4	NCTPS II	3,228	3,068
5	Mettur TPS II	3,203	3,150
Gas Power Generating Stations (kCal/scm):			
6	Tirumakottai GTPS	10,538	10,524
7	Kuttalam GTPS	10,417	10,393
8	Basin Bridge GTPS	10,572	-
9	Valuthur GTPS	9,719	9,716



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- 3.9.2 It is submitted that all the stations has achieved the GCV value slightly below the norms as approved by the Hon'ble Commission. It is requested that the Hon'ble Commission may approve the same.
- 3.9.3 TNPdCL uses both indigenous coal as well as imported coal for its generating stations. The GCV of coal are subjected to blending ratio and quality of coal consumed for generation.
- 3.9.4 Further, TNPdCL receives coal from different collieries of different coal companies including CIL, WCL, MCL, NCL etc. TNPdCL also procures imported coal in the event of shortfall in domestic coal supply and to enhance the heat content of coal by blending.
- 3.9.5 The Generating Stations of TNPdCL are located far away from coal mines, due to which higher freight cost is required to be paid. Therefore, the landed cost of coal is higher on account of higher railways freight, ocean freight and other coal handling charges which are beyond the control of TNPdCL.
- 3.9.6 TNPdCL also utilises domestic natural gas, naphtha and HSD for its gas based generating stations.
- 3.9.7 The following Table summarises the actual prices of primary fuels for FY 2023-24 along with values as approved by the Hon'ble Commission in its previous Tariff Order.

Table 7: Price of Primary Fuel-Thermal Stations for FY 2023-24

S. No.	Power Station	FY 2023-24	
		Approved	True Up
Thermal Power Generating Stations (Rs. /MT)			
1	Tuticorin TPS	4300	3,881
2	Mettur TPS I	5500	5,946
3	NCTPS I	4200	4,033
4	NCTPS II	4500	4,640
5	Mettur TPS II	5600	7,166
Gas Power Generating Stations (Rs. /SCM)			
6	Tirumakottai GTPS	9.15	25
7	Kuttalam GTPS	9.74	26
8	Basin Bridge GTPS*	56.08	-
9	Valuthur GTPS	8.86	23

*Total Cost in Rs. Crore

- 3.9.8 The cost of coal in MTPS I, MTPS II, and NCTPS II is slightly higher than the approved values due to additional transportation cost which is unavoidable.
- 3.9.9 With respect to Kuttalam, Valuthur and Thirumakottai(K) Gas Turbine Power Stations, the variable cost for FY 2023-24 had been approved by the Hon'ble TNERC during the year 2022, considering the prevailed Gas price of 2.5 USD/MMBTU. But, M/s. GAIL has increased the Gas price to 6.1 USD/MMBTU during the period from



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01.04.2022 to 30.09.2022, 8.57 USD/MMBTU during the period from 01.10.2022 to 07.04.2023 and to 6.5 USD/MMBTU from 08.04.2023 onwards. Hence, the Variable Cost had also been increased.

3.9.10 The Hon'ble Commission is kindly requested to approve any deviation with respect to fuel related cost as the same is Uncontrollable and need to be entirely pass through to the consumers.

3.10 Net Generation

3.10.1 Based on Plant Load Factor and Auxiliary Energy Consumption as discussed in aforesaid sections, the net-generation for TANGEDCO's Generating Stations for FY 2023-24 has been worked out as shown below.

Table 8: Net Generation (in MU)

S. No.	Power Station	FY 2023-24	
		Approved	True Up
1	Tuticorin TPS	4,629	5,902
2	Mettur TPS I	4,713	5,280
3	NCTPS I	3,282	3,251
4	NCTPS II	5,866	5,913
5	Mettur TPS II	2,933	2,959
Total Thermal		21,423	23,305
6	Tirumakottai GTPS	266	35
7	Kuttalam GTPS	374	650
8	Basin Bridge GTPS	6	-
9	Valuthur GTPS	1,078	1,103
Total Gas		1724	1,787
10	Erode HEP	1,117	632
11	Kadamparai HEP	864	517
12	Kundah HEP	2,221	1,755
13	Tirunelveli HEP	1,145	786
Total Hydro		5,347	3,690
Wind		4	3
Total TANGEDCO		28,498	28,785

3.10.2 The net generation for Tuticorin TPS, Mettur TPS I, NCTPS II, MTPS II, Kuttalam GTPS and Valuthur GTPS is more than the generation approved by the Hon'ble Commission. The generation for NCTPS I is less than approved due to higher auxiliary consumption, while Tirumakottai GTPS, Basin Bridge GTPS, Erode HEP, Kadamparai HEP, Kundah HEP and Tirunelveli HEP is less than the generation approved by the Hon'ble Commission vide last tariff order dated 9th September 2022 mainly on account of lower PLF for reasons already specified above.

3.10.3 TNPdCL erstwhile TANGEDCO requests the Hon'ble Commission to approve the



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actual net-generation achieved by Thermal, Gas and Hydro Plants.

3.11 Computation of Fuel Expenses/Variable Cost for FY 2023-24

3.11.1 The total actual fuel expenses (including Coal, Gas, Oil & Naphtha) as per Note 28 of Audited Accounts for FY 2023-24 is Rs.11,832.64 Crore.

3.11.2 The Table below provides the actual plant wise variable cost during FY 2023-24 excluding operating expenses:

Table 9: Variable Cost for FY 2023-24 (Rs. Crore)

S. No.	Power Station	FY 2023-24	
		Approved	True Up
Thermal Power Generating Stations			
1	Tuticorin TPS	1,835	2,274
2	Mettur TPS I	2,359	2,872
3	NCTPS I	1,181	1,281
4	NCTPS II	2,310	2,476
5	Mettur TPS II	1,463	1,854
Gas Power Generating Stations			
6	Tirumakottai GTPS	46	50
7	Kuttalam GTPS	69	357
8	Basin Bridge GTPS	56	0.21
9	Valuthur GTPS	194	585
	Total	9,513	11,748

3.11.3 Based on operating parameters and actual fuel cost, energy charges for FY 2023-24 for TNPdCL's power stations are indicated below.

Table 10: Variable Cost per Unit (Rs. /kWh) for FY 2023-24

S. No.	Power Station	FY 2023-24	
		Approved	True Up
Thermal Generating Stations:			
1	Tuticorin TPS	3.96	3.85
2	Mettur TPS I	5.01	5.43
3	NCTPS I	3.60	3.94
4	NCTPS II	3.94	4.19
5	Mettur TPS II	4.99	6.23
Gas Power Generating Stations:			
6	Tirumakottai GTPS	1.73	14.44
7	Kuttalam GTPS	1.84	5.49
8	Basin Bridge GTPS	89.56	-
9	Valuthur GTPS	1.80	5.30

3.11.4 TNPdCL erstwhile TANGEDCO submits that due to various operational constraints



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of TNPGL thermal and gas power plants, higher SHR, poor fuel parameters etc. as already explained in paragraphs above, the variable cost for some of the Generating Stations is higher compared to the cost approved by the Commission in its previous Tariff Order. Accordingly, TNPDCCL erstwhile TANGEDCO requests the Hon'ble Commission to approve the actual variable cost as shown in Table above.

3.12 Summary of variable cost for FY 2023-24

3.12.1 The following table shows the summary of variable cost for FY 2023-24

Table 11: Summary of variable cost for FY 2023-24

S. No.	Power Station	FY 2023-24				
		Gross Generation (in MUs)	Auxiliary Consumption (in MUs)	Net Generation (in MUs)	Variable Cost (Rs. Crores)	Variable Cost (Rs./kWh)
1	Tuticorin TPS	6,485	9.00%	5,902	2,274	3.85
2	Mettur TPS I	5,805	9.04%	5,280	2,872	5.44
3	NCTPS I	3,617	10.11%	3,251	1,281	3.94
4	Mettur TPS II	3,202	7.59%	2,959	1,854	6.27
5	NCTPS II	6,370	7.17%	5,913	2,476	4.19
6	Tirumakottai GTPS	47	26.55%	35	50	14.44
7	Kuttalam GTPS	695	6.45%	650	357	5.49
8	Basin Bridge GTPS	-	0.00%	-	0.21	-
9	Valuthur GTPS	1,177	6.27%	1,103	585	5.30
10	Erode HEP	637	0.87%	632	-	-
11	Kadamparai HEP	519	0.49%	517	-	-
12	Kundah HEP	1,762	0.39%	1,755	-	-
13	Tirunelveli HEP	790	0.40%	787	-	-
	Total	31,106		28,784	11,748	4.08

3.12.2 TNPDCCL erstwhile TANGEDCO requests the Hon'ble Commission to approve variable cost of TNPGL and TNGECL Generating stations for FY 2023-24 as shown in above Table.

3.13 Capital Expenditure and Capitalization

3.13.1 TNPDCCL erstwhile TANGEDCO submits that the expenditure incurred in each of the power station of TNPGL and TNGECL is on account of regular works like replacement of worn-out machinery, damaged equipment, transformers, boilers, generators, stators, auxiliary equipment, etc. which are legitimate and necessary to be carried out for effective and efficient working of the power station.

3.13.2 TNPDCCL erstwhile TANGEDCO also submits that the expenditure incurred for the distribution function during the respective year is on account of regular works carried out during the year which were necessary for efficient working of the distribution system.

3.13.3 The works carried out for the distribution function are mainly on account of addition



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of LT and HT lines, distribution transformers, services rendered during the year.

- 3.13.4 TNPdCL erstwhile TANGEDCO submits that the additional capitalization incurred by TNPdCL, TNGECL and TNPdCL erstwhile TANGEDCO during the year being Trued-up is in line with the clause 19 of the TNERC Tariff Regulations 2005. This capital expenditure has been incurred for efficient and successful operation of the generating stations and distribution network and is based on actual numbers in audited accounts. Therefore, TNPdCL erstwhile TANGEDCO requests the Hon'ble Commission to approve capitalisation as per Audited Accounts for FY 2023-24 as shown in table below.

Table 12: Net Addition in GFA for FY 2023-24 (in Rs. Crore)

S. No	Particulars	Approved		True Up	
		Capital Expenditure	Net Capitalization	Capital Expenditure	Net Capitalization
1	Total Generation	2356.83	3062.14	403.90	142.35
2	Total Distribution	4651.07	4379.77	2,261.18	735.41
3	Total TANGEDCO	7007.9	7441.91	2,665.08	877.76

- 3.13.5 The actual capital expenditure has been incurred in accordance with the Capital Investment Plan approved by the Commission. However, certain expenditures could not be realized due to delays in the execution of work, the tender process, the RDSS Scheme, and the installation of FGD Plants. Detailed information on the incurred expenditures is provided in Annexure-I. TNPdCL erstwhile TANGEDCO respectfully requests the Hon'ble Commission to approve the expenditures based on the actual amounts incurred.

3.14 Fixed Cost for FY 2023-24

- 3.14.1 TNPdCL erstwhile TANGEDCO submits that TNPdCL, TNGECL and TNPdCL erstwhile TANGEDCO has determined actual fixed cost for its generating station and Distribution business on the basis of TNERC (Terms & Conditions of Tariff) Regulation, 2005 and annual audited accounts for FY 2023-24.
- 3.14.2 The fixed cost for Generating plants and Distribution business for FY 2023-24 as categorized under the following heads may kindly be allowed.
- ✓ Depreciation
 - ✓ Interest and Finance Charges
 - ✓ Return on Equity
 - ✓ Operation and Maintenance Expenses
 - ✓ Interest on Working Capital
 - ✓ Operating Expenses and Extra-Ordinary Items



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✓ Other Income

3.15 Depreciation

- 3.15.1 For working out depreciation, the opening GFA for each of the generating stations of TNPGL and TNGECL and for distribution business of TNPDCCL erstwhile TANGEDCO for FY 2023-24 is considered same as the closing GFA for FY 2022-23.
- 3.15.2 The asset additions during the year have been considered as per audited figures during the respective period. The closing GFA for FY 2023-24 has been arrived by adding the asset capitalised and by deducting the asset de-capitalised, if any, during the respective year.
- 3.15.3 The actual depreciation for generating and distribution function of TNPGL, TNGECL and TNPDCCL erstwhile TANGEDCO as per Note 31 of Audited Accounts is Rs. 3,577.34 Crore for FY 2023-24. It is to be submitted that aforesaid depreciation as per IND AS.TNPDCCL erstwhile TANGEDCO has arrived at these figures based on the asset-wise depreciation rates as approved by TNERC. The depreciation has been computed on the opening GFA of respective year in line with the Regulation 24 of the TNERC Tariff Regulations.
- 3.15.4 The Table below shows the comparison of actual plant wise depreciation for FY 2023-24 with that of approved in Tariff Order dated 9th September, 2022.

Table 13: Depreciation for FY 2023-24 (in Rs. Crore)

S. No.	Power Station	FY 2023-24	
		Approved	True Up
1	Tuticorin TPS	172	135
2	Mettur TPS I	99	107
3	NCTPS I	165	81
4	Mettur TPS II	407	103
5	NCTPS II	290	222
6	Tirumakottai GTPS	35	13
7	Kuttalam GTPS	35	14
8	Basin Bridge GTPS	35	13
9	Valuthur GTPS	43	50
10	Erode HEP	190	158
11	Kadamparai HEP	29	91
12	Kundah HEP	67	83
13	Tirunelveli HEP	50	75
Total Generation		1,617	1,145
Distribution		1,828	2,432
Total TANGEDCO		3,445	3,577

- 3.15.5 The Hon'ble Commission is requested to approve total depreciation for FY 2023-24 as shown in the Table above.



3.16 Interest and Finance charges

3.16.1 The Government of Tamil Nadu approved the proposal of demerge of TANGEDCO into three separate entities, as outlined in Chapter 01. Consequently, the existing loans have been distributed among the newly established entities vide G.O. Ms. No. 32, Energy (B2), 6th March 2024.

3.16.2 TNPDCCL erstwhile TANGEDCO has taken closing loan balance of FY 2022-23 to be opening balance of FY 2023-24 for each generating station of TNPGL and TNGEL and for Distribution business of TNPDCCL erstwhile TANGEDCO.

3.16.3 As per Clause 23(a) of TNERC Regulations 2005

"Interest on loan Capital shall be computed loan-wise on the loan arrived at in the manner set out in Regulation 21 "

"Regulation 21

For the purpose of determination of tariff, debt-equity ratio as on the date of commercial operation of Generating Station and transmission projects, sub-station, distribution lines or capacity expanded after the notification of these Regulations shall be 70:30. Where equity employed is more than 30% the amount of equity shall be limited to 30% and the balance amount shall be considered as loans, advanced at the weighted average rate of interest and for weighted average tenor of the long term debt component of the investment.

Provided that in case of a Generating Company or other licensees, where actual equity employed is less than 30%, the actual debt and equity shall be considered for determination of return on equity in tariff computation.

3.16.4 Other finance charges which comprise of interest on consumers' security deposit and other charges such as cost of raising finance, bank charges, etc. are included in other interest and Finance Charges for FY 2023-24 as separately shown in the Table below.

3.16.5 The following Table shows Interest and Finance Charges for the FY 2023-24 for TNPGL, TNGEL and TNPDCCL erstwhile TANGEDCO.

Table 14: Interest & Finance Charges for FY 2023-24 (Rs. Crore)

S. No.	Power Station	FY 2023-24	
		Approved	True Up
Thermal Power Generating Stations:			
1	Tuticorin TPS	660	1,192
2	Mettur TPS I	394	571
3	NCTPS I	685	1,391
4	Mettur TPS II	365	614
5	NCTPS II	405	634
Gas Power Generating Stations:			
6	Tirumakottai GTPS	156	377
7	Kuttalam GTPS	132	341
8	Basin Bridge GTPS	274	776
9	Valuthur GTPS	220	438



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S. No.	Power Station	FY 2023-24	
		Approved	True Up
Hydro Power Generating Stations:			
10	Erode HEP	323	122
11	Kadamparai HEP	134	72
12	Kundah HEP	309	59
13	Tirunelveli HEP	204	71
14	Total Generation (A)	4,262	6,658
15	Distribution- Interest	4,984	6,423
16	Interest on security deposit and MCD		1,006
17	Other finance charges		700
18	Total Distribution (B)	4,984	8,129
19	TANGEDCO	9,246	14,788

3.16.6 The details of Interest Other Finance Charges are as below-

S.No.	Particulars	Amount in Crores
1	Interest On Consumer Security Deposits	996
2	Interest On Consumer Meter Caution Deposits	10
	Interest on Security Deposits and Meter Caution Deposits Total	1,006
3	Bank charges	51
4	Guarantee Charges	249
5	Interest on Contributory Pension Scheme	302
6	Interest On General Provident Fund	95
7	Interest On Special Provident Fund	3
8	Other Finance Charges Total	700

3.17 Other interest and finance charges:

3.17.1 TNPDCCL erstwhile TANGEDCO submits that other Finance Charges comprise interest on consumers' security deposit and other charges such as cost of raising finance, bank charges, etc. TNPDCCL erstwhile TANGEDCO has considered other interest and finance charges for FY 2023-24 as per audited Accounts of the respective year.

3.17.2 TNPDCCL erstwhile TANGEDCO submits that TANGEDCO (TNGECL, TNPGL and TNPDCCL) has included the above charges in total interest and finance charges, hence it is submitted for approval of other interest and finance charges.

3.18 Return on Equity

3.18.1 The total additional equity is bifurcated into generation and distribution function based on the opening balance of Gross Block allotted to generation and distribution functions of TANGEDCO.


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- 3.18.2 Equity for generation function is further sub-allocated into plant wise based on opening gross block for each of the plant. The additions and deductions during the year are considered as per actual for FY 2023-24.
- 3.18.3 The rate of return on equity has been considered at 14% as specified in TNERC (Terms and Conditions of Tariff) Regulations, 2005 and has been applied on the average equity balance of each power station and distribution function.
- 3.18.4 TANGEDCO would like to submit that a utility is entitled for Return on Equity as the RoE earned is invested every year to carry out future capacity additions. The relevant extracts of TNERC (Terms & Conditions of Tariff) Regulation 2005 is reproduced herein:

“21. Debt-Equity Ratio

For the purpose of determination of tariff, debt-equity ratio as on the date of commercial operation of Generating Station and transmission projects, sub-station, distribution lines or capacity expanded after the notification of these Regulations shall be 70:30. Where equity employed is more than 30% the amount of equity shall be limited to 30% and the balance amount shall be considered as loans, advanced at the weighted average rate of interest and for weighted average tenor of the long term debt component of the investment”

“Provided that in case of a Generating Company or other licensees, where actual equity employed is less than 30%, the actual debt and equity shall be considered for determination of return on equity in tariff computation.” (Emphasis Added)

- 3.18.5 It is submitted that RoE earned is invested every year to carry out future capacity additions and is essential for sustainable operations. The return on equity claimed by TANGEDCO is as shown in below table

Table 15: Return on Equity for FY 2023-24 (Rs. Crore)

S. No.	Power Station	FY 2023-24	
		Approved	True Up
1	Tuticorin TPS	-	168
2	Mettur TPS I	-	134
3	NCTPS I	-	100
4	Mettur TPS II	-	96
5	NCTPS II	-	192
6	Tirumakottai GTPS	-	17
7	Kuttalam GTPS	-	16
8	Basin Bridge GTPS	-	19
9	Valuthur GTPS	-	30
10	Erode HEP	-	64
11	Kadamparai HEP	-	78
12	Kundah HEP	-	107
13	Tirunelveli HEP	-	48



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S. No.	Power Station	FY 2023-24	
		Approved	True Up
14	Total Generation	-	1,068
15	Distribution	-	797
16	Total TANGEDCO	-	1,865

*No approved figures as the Hon'ble Commission disallowed the return on equity in line with its earlier Orders.

3.18.6 It is therefore requested to the Hon'ble Commission to approve the RoE as shown in the Table above.

3.19 Operation and Maintenance Expenses

3.19.1 The Operation and Maintenance expenses includes actual expenses incurred by TNGECL, TNPGL and TNPDCCL erstwhile TANGEDCO towards Employee Expenses, Administrative and General Expenses (A&G) and Repair and Maintenance Expenses (R&M).

3.19.2 The Employee expenses includes salaries, overtime, DA, medical expenses, headquarter expenses and other terminal benefits. The increase in employee expenses is mainly on account of wage revisions, inflations, etc. which are beyond the control of TANGEDCO and the same has also been considered by Hon'ble Commission as pass through in its previous Orders.

3.19.3 The net employee expenses incurred by TNGECL, TNPGL and TNPDCCL erstwhile TANGEDCO for both of its business (i.e., Generation and Distribution business) as per Audited Accounts is Rs.10,229.99 crores and employee benefit expenses and remeasurement of defined benefit plan for FY 2023-24 is Rs.3240.30 crores.

3.19.4 The Administrative and General (A&G) expenses include rent/rate & taxes, insurance, legal/technical/consultancy charges and audits fees, and other similar nature miscellaneous expenses. The net A&G expenses incurred for FY 2023-24 as per Audited Accounts stands at Rs.491.34 Crores. TANGEDCO has claimed A&G expense after netting off the capitalised expenses, fabrication charges and expenses towards TANGEDCO's wind farms.

3.19.5 The R&M expenses are the expense incurred towards repairs and maintenance in order to keep the asset quality maintained given the ageing of equipment. It is to be submitted that the assets of TANGEDCO are old and require regular maintenance in order to ensure smooth and reliable operation. However, TANGEDCO has tried its best to minimize the R&M expenses. The actual R&M expenses as per Audited Account after netting off expenses capitalised and TANGEDCO's wind farms, have been worked out as Rs.1532.92 Crore for FY 2023-24.

3.19.6 Based on above, the total O&M expenses during FY 2023-24 has been worked out at Rs.15,458.10 Crore after adjusting capitalisation of expenditure.

3.19.7 The Table below shows the actual operation and maintenance expenses for FY 2023-24 for generation and distribution business vis-à-vis normative O&M expense as approved in the previous Tariff Order.



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Table 16: O&M Expenses for FY 2023-24 (Rs. Crore)

S. No.	Power Station	FY 2023-24	
		Approved	True Up
1	Tuticorin TPS	433	753
2	Mettur TPS I	352	550
3	NCTPS I	313	727
4	Mettur TPS II	298	258
5	NCTPS II	182	384
6	Tirumakottai GTPS	18	27
7	Kuttalam GTPS	29	39
8	Basin Bridge GTPS	15	12
9	Valuthur GTPS	32	83
10	Erode HEP	109	142
11	Kadamparai HEP	58	128
12	Kundah HEP	99	191
13	Tirunelveli HEP	89	195
14	Total Generation	2,027	3,489
15	Distribution	10,670	11,969
16	Total TANGEDCO	12,697	15,458

3.19.8 The above actual operation and maintenance expenses claimed for FY 2023-24 is legitimate and are necessary as TNGECL, TNPGL and TNPDCCL erstwhile TANGEDCO has to undertake independently number of activities such as planning, safety, quality assurance, human resources, IT, corporate office, regulatory affairs, legal, accounts, finances, auditing etc. and various miscellaneous activities.

3.19.9 It is therefore requested to the Hon'ble Commission to approve the actual O&M expenses as shown in Table above.

3.20 Interest on Working Capital

3.20.1 TNPDCCL erstwhile TANGEDCO has claimed the interest on working capital for FY 2023-24 on normative basis as specified in Regulation 26 of TNERC (Terms and Conditions of Tariff) Regulations, 2005.

3.20.2 As per Tariff Regulations 2005, maintenance spares for all types of generating stations and transmission systems are considered at 1% of the historic cost after escalating 6% p.a. However, such escalation is not specified by the Tariff Regulations 2005 for distribution system. Therefore, TNPDCCL erstwhile TANGEDCO requests the Commission to maintain uniform approach across generation, transmission and distribution and allow 6% p.a. escalation on maintenance spares.

3.20.3 As per Regulation 27 of Tariff Regulations, rate of interest for working capital shall be equivalent to the short-term primary lending rate of State Bank of India as on 1st April of the relevant year. Accordingly, the rate of interest for FY 2023-24 has been arrived at 14.85%.



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3.20.4 The interest on working capital computed for generation and distribution business is given in the table below:

Table 17: Interest on Working Capital for FY 2023-24 (Rs. Crore)

S. No.	Power Station	FY 2023-24	
		Approved	True Up
Thermal Power Generating Stations:			
1	Tuticorin TPS	110	186
2	Mettur TPS I	72	190
3	NCTPS I	80	135
4	Mettur TPS II	131	127
5	NCTPS II	86	175
Gas Power Generating Stations:			
6	Tirumakottai GTPS	7	14
7	Kuttalam GTPS	12	25
8	Basin Bridge GTPS	9	25
9	Valuthur GTPS	13	40
Hydro Power Generating Stations:			
10	Erode HEP	18	19
11	Kadamparai HEP	6	13
12	Kundah HEP	12	15
13	Tirunelveli HEP	9	15
14	Total Generation	566	978
15	Distribution	15	675
16	Total TANGEDCO	581	1,653

3.20.5 It is submitted that while calculating the interest on working capital for distribution function, the amount estimated as security deposit has been deducted by the Hon'ble Commission from the working capital requirement in the past Tariff Order. It may be noted that deduction of security deposit from working capital is not specified in TNERC (Terms and Conditions of Tariff) Regulations, 2005. However, in line with the approach adopted by the Hon'ble Commission, TNPDCCL erstwhile TANGEDCO has deducted security deposit while calculating the Working Capital requirement.

3.21 Operating Charges and Extra-Ordinary Items

3.21.1 TNPDCCL erstwhile TANGEDCO wishes to submit that in order to run a plant in an effective and efficient manner, there are certain O&M nature costs which are necessary to be incurred by the power stations. With regard to thermal and gas generating stations, these costs include fuel related cost other than those used for generation of electricity, cost of water, lubricant and consumables. For hydro generating stations, these costs are related to station supplies and cost of water for hydel power. TNPDCCL erstwhile TANGEDCO has categorized such costs under the



head operating charges and extra-ordinary item.

3.21.2 Although, these costs are minimal but are necessary in order to run a plant at its optimum level. TNPdCL erstwhile TANGEDCO has sought such costs separately through its ARR, as the same has not been defined under O&M expense as per TNERC Tariff Regulations, 2005.

3.21.3 TNERC Tariff Regulations, 2005 defines Operation and Maintenance expenses as below;

“(bb) ‘Operation and Maintenance Expenses’ or ‘O and M Expenses’ means the expenditure incurred in operation and maintenance of the generating station, or part thereof / transmission system / distribution system, including the expenditure on employee cost, repair and maintenance and administration and general expenses.”

3.21.4 From the above, it can be seen that the O&M expenses as per TNERC Regulations includes expenses towards employee, repair and maintenance and administration and general purpose only. Further, it is to be noted that TNERC Tariff Regulations, 2005 do recognise the above cost and have also exclusively specified the same for Hydro Generating Stations under the Regulations 53(2). The relevant extract of the Regulation is as reproduced below:

53. Computation of Annual Energy Charges

(2) The annual capacity (fixed) charges shall consist of the following and shall be computed as per the principles in Chapter III.

...

...

(d) Operation and Maintenance expenses excluding operating expenses like water charges, lubricants, consumables and station supplies.

...

(3) Primary Energy Charges shall be the operating expenses like cost of water, lubricants, consumables and station supplies.

3.21.5 Although TNERC Regulations do explicitly define the operating expenses in case of Hydro Power Generating Stations but in case of Thermal Generating Stations the existing Regulations are silent. Under such a circumstance, the existing Regulations in accordance with Regulation 4 of TNERC Tariff Regulations, 2005 shall be guided by principles and methodologies specified by the Central Commission. TNPdCL erstwhile TANGEDCO further wishes to submit that the O&M expenses under CERC Tariff Regulations clearly specifies the other operating charges such as consumables, insurance and overheads and other fuel related cost apart from the expenditure on manpower, maintenance, repairs and maintenance spares. The relevant extract from CERC Tariff Regulations is as reproduced below.

3.21.6 CERC Terms and Condition of Tariff Regulations, 2019 defines O&M expenses as below;

“(45) ‘Operation and Maintenance Expenses’ or ‘O&M expenses’ means the expenditure incurred for operation and maintenance of the project, or part



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thereof, and includes the expenditure on manpower, maintenance, repairs and maintenance spares, consumables, insurance and overheads and fuel other than used for generation of electricity. {emphasis added}”

3.21.7 Based on the above, it can be clearly inferred that apart from the expenditure on employee cost, repair and maintenance and administration and general expenses, there are certain other costs are incurred by the power station. TNPDC erstwhile TANGEDCO has categorized the same under operating charges and extra ordinary items.

3.21.8 However, the Hon’ble Commission has disallowed the above cost in its previous Tariff Order stating that these costs are actually a part of the normative O&M expenses and have been considered there. The relevant extract from the Tariff Order is reproduced below;

“4.15.3 The Commission is of the view that the Operating Charges and Extra-Ordinary Items claimed by TANGEDCO separately, are actually a part of the normative O&M expenses and cannot be separately allowed.”

3.21.9 In this regards TNPDC erstwhile TANGEDCO wishes to submit that the normative O&M expenses so derived by the Hon’ble Commission in accordance with Regulation 25 of TNERC Tariff Regulations, 2005 does not include the operating charges and extra-ordinary items.

3.21.10 The actual Operating Charges incurred by TANGEDCO is Rs. 150.25 Crore for FY 2023-24 as shown in Table below.

Table 18: Operating Charges for FY 2023-24(Rs. Crore)

S. No.	Power Station	FY 2023-24	
		Approved	True Up
1	Tuticorin TPS	-	54
2	Mettur TPS I	-	21
3	NCTPS I	-	18
4	Mettur TPS II	-	11
5	NCTPS II	-	31
6	Tirumakottai GTPS	-	0
7	Kuttalam GTPS	-	0.34
8	Basin Bridge GTPS	-	0.21
9	Valuthur GTPS	-	0.01
10	Erode HEP	-	3
11	Kadamparai HEP	-	2
12	Kundah HEP	-	10
13	Tirunelveli HEP	-	0.19
14	Total Generation	-	150
15	Distribution	-	0
16	Total TANGEDCO	-	150



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3.21.11 TNPDCCL erstwhile TANGEDCO requests the Hon'ble Commission to approve the actual plant wise Operating Charges and Extra-Ordinary Items for FY 2023-24 as shown in above table.

3.22 Other Income and Non-Tariff Income

3.22.1 The Regulation 40 of TNERC Tariff Regulations, 2005 defines Other Income as income other than sale of electricity. Further, the Regulation 41(2) specifies that the capacity charge for Generating Company shall be arrived at after deducting Other Income from the total annual expenses.

3.22.2 In case of Distribution function, the treatment of Other Income and Non-Tariff is provided under Regulation 80 of TNERC Tariff Regulations, 2015. The said Regulation specifies that the ARR for Distribution Licensee shall be arrived at after deducting Other Income including Non-Tariff Income related charges, income from surcharge and additional surcharge from open access, etc. from total expenses.

3.22.3 Further, the Non-Tariff related charges as stated above has been defined under Regulation 68 (2) as *-rent for meter provided by the licensee and other charges as per the provision of Tamil Nadu Electricity Supply Code and Tamil Nadu Electricity Distribution Code.*

3.22.4 The various component of Other Income for TANGEDCO includes interest on staff loan and advances, income from investment, interest on loan advances and advances to licensee, delayed payment surcharge, rebate on power purchase bills, prompt payment rebate from financial institutions, interest from bank/trading, miscellaneous receipts, etc. The total Other Income as per Note 26 of Audited Accounts stands at Rs.3,102.39 Crore for FY 2023-24.

3.22.5 TNPDCCL erstwhile TANGEDCO submits that based on the above the following Other Income has been computed for FY 2023-24 pertaining to Generation and Distribution business of TANGEDCO as shown in the Table below:

Table 19: Other Income for FY 2023-24 (Rs. Crore)

S. No.	Power Station	FY 2023-24	
		Approved	True Up
1	Tuticorin TPS	36.98	57
2	Mettur TPS I	37.69	81
3	NCTPS I	4.20	67
4	Mettur TPS II	17.84	48
5	NCTPS II	6.42	32
6	Tirumakottai GTPS	0.15	0.02
7	Kuttalam GTPS	0.15	1.26
8	Basin Bridge GTPS	0.03	0.00
9	Valuthur GTPS	0.29	0.96
10	Erode HEP	-0.1	0.5



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S. No.	Power Station	FY 2023-24	
		Approved	True Up
11	Kadamparai HEP	1.56	11
12	Kundah HEP	0.94	16
13	Tirunelveli HEP	1.03	2
14	Total Generation	107	317
15	Distribution	1,286	2,786
16	Total TANGEDCO	1,393	3,102

3.22.6 TNPDCCL erstwhile TANGEDCO requests the Hon'ble Commission to approve the Other Income as per Audited Accounts as claimed in the above table.

3.22.7 Further, the various component of Non-Tariff Income pertaining to Distribution function of TANGEDCO as per Regulations 68(2) of TNERC Tariff Regulations, 2005 includes meter rent/service line rental, recoveries for theft of power/malpractices, wheeling charges recoveries and other miscellaneous charges recovered from consumers. The total Non-Tariff Income as per Note 25 of Audited Accounts is Rs.4,586.34 Crore for FY 2023-24.

3.22.8 The Table below shows the element wise breakup of Non-Tariff Income for FY 2023-24:

Table 20: Non-Tariff Income for FY 2023-24 (Rs. Crore)

S.No	Particulars	FY 2023-24	FY 2023-24
		(Approved)	(True-Up)
1	Meter Rent / Service line Rentals		98
2	Open Access Wheeling charges		995
3	Network Charges HT		62
4	Network Charges LT		38
5	Miscellaneous Charges collected from Consumers		376
6	Cross Subsidy Surcharge		579
7	Reconnection Charges		83
8	Name Transfer Fees		50
9	Application Fees		22
10	Dismantling Charges	2,612	6
11	Shifting Charges		36
12	Estimate Charges		198
13	BPSC		72
14	Charges for Replacement of damaged/burnt meter/Visit.		10
15	Charges for dishonoured cheque - Service Charge.		1
16	Fuse charges		1
17	Income from other services provided to customers		1,877
18	Parallel Operation Charges HT		14
19	Green Tariff Charges		5



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S.No	Particulars	FY 2023-24	FY 2023-24
		(Approved)	(True-Up)
20	Other Operational Income		63
21	Excess Demand Charges, Power Factor Penalty, and CC Arrears		1,537
22	Theft of Energy		94
23	Capacitor Compensation Charges		3
24	Damage to Board Properties		8
	Total Non-Tariff Income	2,612	6,228

3.22.9 The actual Non-Tariff Income includes Cross Subsidy Surcharge, Belated Payment Surcharge, Capacitor Compensation Charges, etc amounting to Rs.4106.02 crores which is accounted in the Revenue from Operations in the Audited Balance Sheet.

3.22.10 The income from other services provide to consumers (DCW Works) of Rs.1876.75 crores, estimate charges of Rs.198.43 crores and Service Connection Charges of Rs.46.70 crores are Capital Receipts which are not part of the ARR, however recognised as revenue receipts as per IND AS Accounting Policy.

3.22.11 TNPDCCL erstwhile TANGEDCO requests the Hon'ble Commission to approve the Other Income and Non-Tariff Income, as shown in Table above.

3.23 Summary of Fixed Cost of TANGEDCO for FY 2023-24

3.23.1 The Table below shows the summary of fixed cost for FY 2023-24 for Generation and Distribution function of TANGEDCO.



Table 21: Summary of Fixed Cost for FY 2023-24 (Rs. Crore)

S no.	Name of the plant	Depreciation	Interest & finance charges	Interest on Working Capital	Return on Equity	Operation and Maintenance Expenses	Operating Expenses	Other Income	Non-Tariff Income	Total Annual Fixed Cost
1	TTPS	135	1,192	186	168	753	54	57		2,432
2	MTPS I	107	571	190	134	550	21	81		1,492
3	NCTPS I	81	1,391	135	100	727	18	67		2,385
4	MTPS-II	103	614	127	96	258	11	48		1,159
5	NCTPS-II	222	634	175	192	384	31	32		1,604
6	Tirumakottai GTPS	13	377	14	17	27	-	0.02		448
7	Kuttalam-GTPS	14	341	25	16	39	0.34	1		435
8	Basin Bridge-GTPS	13	776	25	19	12	0.21	0		845
9	Valuthur-GTPS	50	438	40	30	82	0.01	1		639
10	Erode-HPS	158	122	19	64	142	3	0.42		508
11	Kadamparai-HPS	91	72	13	78	128	2	11		373
12	Kundah-HPS	83	59	15	107	191	10	16		449
13	Tirunelveli-HPS	75	71	15	48	195	0.19	2		402
14	Total Generation	1,145	6,658	978	1,068	3,489	150	317		13,172
15	Distribution	2,432	8,129	675	797	11,969	-	2,786	6,228	14,989
16	Total TANGEDCO	3,577	14,788	1,653	1,865	15,458	150	3,102	6,228	28,161



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3.24 Total Cost for FY 2023-24

3.24.1 The following Table shows total cost of generation and distribution function of TANGEDCO for FY 2023-24.

Table 22: Total Cost for Generation & Distribution Function for FY 2023-24 (Rs. Crore)

Year	FY 2023-24		
Power Station	Fixed Cost	Variable Cost	Total Cost
Tuticorin TPS	2,432	2,274	4,706
Mettur TPS I	1,492	2,872	4,364
NCTPS I	2,385	1,281	3,666
MTPS II	1,159	1,854	3,013
NCTPS II	1,604	2,476	4,080
Coal based Stations	9,073	10,756	19,829
Tirumakottai GTPS	448	50	498
Kuttalam GTPS	435	357	792
Basin Bridge GTPS	845	0	846
Valuthur Unit-I	639	585	1,224
Gas based Stations	2,367	992	3,359
Erode HEP	508	-	508
Kadamparai HEP	373	-	373
Kundah HEP	449	-	449
Tirunelveli HEP	402	-	402
Hydro Stations	1,732	-	1,732
Total Generation	13,172	11,748	24,920
Distribution*	14,989	55,754	70,743
Total TANGEDCO	28,161	67,502	95,663

**net of other income and non-tariff income*

3.24.2 TNPDCCL erstwhile TANGEDCO requests the Hon'ble Commission to approve total cost for generation and distribution function of TANGEDCO for FY 2023-24 as shown in table above.

3.25 Energy Balance and T&D loss(%) for FY 2023-24

3.25.1 The actual Transmission Loss for FY 2023-24 is 3.70%, which is within the approved value of 3.81% approved by the Hon'ble Commission.

3.25.2 The total sales as per Statement 9 of Audited Accounts stands at 92,735 MUs for FY 2023-24 and exchange sales 645 MU included in total sales. TANGEDCO has worked out Distribution Losses considering the energy at distribution periphery and total sales at consumer end as mentioned above.



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3.25.3 Accordingly, the Energy Balance for FY 2023-24 in line with the same approach as adopted by the Hon'ble Commission in its previous Tariff Order is as shown in Table below.

Table 23: Energy Balance Statement for FY 2023-24

S.No.	Particulars	Unit	FY 2023-24 Approved	FY 2023-24 True Up
1	Total Energy Required	MUs	1,05,284	1,30,669
2	Inter State Transmission loss	MUs	1,721	2,368
3	Total Energy Available at State Boundary	MUs	1,03,564	1,28,301
4	Intra State Transmission losses	MUs	3,956	4,729
5	Intra State Transmission losses	%	3.81%	3.70%
	Wheeling Energy			19,974
6	Energy Available for Sales			1,03,598
7	HT Sales above 110 kV, 230 kV, and 400 kV Sales (MU)	MUs	2,253	5,462
8	Energy Available at Distribution Network	MUs	97,365	98,136
9	Total LT Sales (MU)	MUs	71,982	71,747
10	Total HT Sales (MU)	MUs	15,647	21,633
11	Total Sales	MUs	87,629	93,380
12	Sales at Distribution Network	MUs	85,700	87,918
13	Distribution Losses	MUs	9,522	10,218
14	Distribution Losses	%	10.00%	10.41%

3.25.4 TNPDCCL erstwhile TANGEDCO requests the Hon'ble Commission to approve the Transmission Loss & Distribution Loss as shown in table above.

3.26 Transmission Charges

3.26.1 The Transmission charges considered in ARR for Distribution function for FY 2023-24 is the actual charge as per the Audited accounts, as under:

Table 24: Transmission charges for FY 2023-24 (Rs. Crore)

S.No	Particulars	Approved	True Up
1	TANTRANSCO Charges	8,547	4,128
2	PGCIL, POSOCO		3,496
3	Total	8,547	7,624

3.26.2 The Hon'ble Commission is requested to approve the Transmission Charges as shown in the Table above.



Petition for True-up of ARR for FY 2023-24

3.27 Power Purchase Expenses from external sources for FY 2023-24

- 3.27.1 Apart from utilization of state-owned generated power, TNPDCCL erstwhile TANGEDCO procures power from various sources including Central Generating Stations (CGS), IPPs, as well as renewables. In addition to the above sources, in case of any shortfall of power when demand exceeds availability or for cost optimization, TNPDCCL erstwhile TANGEDCO also sources power from Exchange/Traders or other sources at the market price.
- 3.27.2 The detailed break-up of power purchase from Traders (LTOA, MTOA and STOA) have been provided in Annexure II.
- 3.27.3 Regarding purchase of energy from Renewable Sources (RE), TNPDCCL erstwhile TANGEDCO submits that the total RPO requirement obligated to it was 27.07% for FY 2023-24 (i.e., 1.60% from Wind sources and 25.47% from other sources).
- 3.27.4 The Table below shows the RPO compliance status of TNPDCCL erstwhile TANGEDCO for FY 2023-24.

Table 25: Status of RPO Compliance for FY 2023-24

Particulars	FY 2023-24	
	Target	Achieved
RPO – Wind	1.60%	2.10%
RPO – Others	25.47%	19.15%
Total RPO	27.07%	21.25%

- 3.27.5 Following Table shows the power purchase quantum and expenses from outside/other sources for FY 2023-24 after excluding wheeling units and wheeling cost.

Table 26: Power Purchase Expenses for FY 2023-24

Power Sources	Approved		True Up	
	Units	PP Cost	Units	PP Cost
	(MUs)	(Rs Crore)	(MUs)	(Rs Crore)
Central Generating Stations				
New Neyveli TS	3,644	1548	4,470	2,242
NLC TS I	0	0	0	0
Neyveli TS-II Stage I	3848	1278	2,082	1,216
NLC TPS II - Second Expansion	0	0	0	0
Neyveli TS-I Expansion	1647	572	1,295	661
Neyveli Expansion Unit II	1033	506	908	478
NTPL JV with NLC	1913	1002	2,055	1,100
NTPC SR (Ramagundan I & II)	3505	1348	3,099	1,524
NTPC SR -III (Ramagundam III)	884	348	910	419
Simhadri Stage II -Unit III	1271	642	1,236	746
Simhadri Stage II -Unit IV	0	0	0	0
NTPC_TNEB JV Vallur Unit 1	5469	3358	4,708	2,798



Petition for True-up of ARR for FY 2023-24

Power Sources	Approved		True Up	
	Units	PP Cost	Units	PP Cost
	(MUs)	(Rs Crore)	(MUs)	(Rs Crore)
NTPC_TNEB JV Vallur Unit 2	0	0	0	0
Talcher	3647	983	3,637	1,109
Madras APS	822	229	925	245
Kaiga APS	1961	753	1,757	620
Kudankulam	8381	3784	6,977	3,044
Kudankulam II	0	0	0	0
PFBR Kalpakkam	-	-	0	0
NTPC ER (FARAKKA STPS)	119	60	211	100
Kudgi Unit I	945	796	1,844	1,405
Kudgi Unit II	0	0	0	0
Talcher I	0	0	0	0
NTPC Kayamkulam	0	0	0	2
NTPC Bongaigaun	0	0	157	99
NTPC/Barh-1	518	181	480	282
NTPC/Barh-2	611	250	707	394
NTPC/KBUN	469	183	113	46
NLC Talabira	0	0	0	0
Reconciliation- Udumalpet and Palladam	0	0	0	0
NTPC/Telangana	0	0	89	50
Total CGS	40,686	17,818	37,661	18,580
IPPs				
SEPC	643	354	2,870	1,855
Samalpatti	0	0	0	0
Madurai Power Corpn	0	0	0	0
Pillaiperumalnallur	0	0	0	0
TAQA (STCMS)	1318	741	1,365	894
LANCO Power (Aban co)	0	0	0	0
PPN Power Gen. Co. Pvt. Ltd.	0	0	0	189
PIONEER Power co. (Penna)	0	0	0	0
Total IPPs (ii)	1961	1094	4,236	2,938
Renewables				
Windmill	3432	1125	1,756	897
Co-generation	347	192	392	219
Cogeneration new	0	0	0	-
Biomass	2	2	2	2
Captive generation	15	3	0	-
Solar	7466	3343	6,580	4,009
Co-Gen in Co-op Sugar Mills	0	0	99	96
Total Renewables (iii)	11,263	4,665	8,829	5,223
Short Term and Others				
UI Power	0	0	-452	170



Petition for True-up of ARR for FY 2023-24

Power Sources	Approved		True Up	
	Units	PP Cost	Units	PP Cost
	(MUs)	(Rs Crore)	(MUs)	(Rs Crore)
Traders-MTOA	886	378	1,957	896
Traders-LTOA	11513	5,511	19,607	10,320
Traders -STOA	886	317	2,650	2,534
Power Exchanges	4,428	4,170	8,606	7,953
Swap	0	0	-186	-
Total Short Term and Others (iv)	19,820	10,376	32,181	21,873
STOA charges		75		81
Add: Hydro Balancing fund				-564
Total	73,730	34,028	82,906	48,130
Transmission Charges TANTRANSCO/PGCIL/POSOCO				7,624
Total Power Purchase Cost	73,730	34,028	82,906	55,754

3.28 Revenue from sale of power

3.28.1 The following Table shows the category wise sales in MU (excluding wheeling units) and revenue earned by TANGEDCO (excluding wheeling revenue and grant from State Government) as per Audited Accounts of FY 2023-24.

Table 27: Sales and Revenue from sale of power for FY 2023-24

S. no	Consumer Category	Tariff Categories as per new Tariff	Approved Sales (Mus)	Revenue as per Approved Sales* (Rs. Crores)	Sales (MUs)	Revenue** (Rs. Crores)
I	High Tension Supply					
	Industries, Factories, IT Services	I	12,404	14,314	15,214	16,553
	Railway Traction	IIA	1,083			
	Govt. Educational Institutions, Govt. Hospitals, Railway Traction, Lift Irrigation, etc	IIA	1,638	2,754	3,263	3,249
	Private Educational Institutions	IIB	310	358	386	428
	Miscellaneous Categories	III	2,428	3,180	2,048	2,792
	Construction Activities and Other Temporary Purposes	IV	37	60	74	129
	Public EV Charging Stations	V			3	3
	Sale of Power to Exchange				646	383
	Sub Total HT (A)		17,900	20,666	21,633	23,537
II	Low Tension Supply					
	Domestic, Multi-tenements, Old	IA	33,608	19,711	32,622	16,904



Petition for True-up of ARR for FY 2023-24

S. no	Consumer Category	Tariff Categories as per new Tariff	Approved Sales (Mus)	Revenue as per Approved Sales* (Rs. Crores)	Sales (MUs)	Revenue** (Rs. Crores)
	age homes, Hand Loom etc.					
	Huts	IB	434	370	366	299
	Bulk Supply with single point Metering	IC	10	9	9	7
	Common Facilities in Multi-tenements	ID& IE		1643	550	554
	Public Lighting and Public Water Supply provided by Govt./Local bodies	IIA	2471	2,405	2,677	2,550
	Government and aided Educational Institutions in Hostels, Govt. Hospitals, others	IIB (1)	158	199	217	230
	Private Educational Institutions	IIB (2)	235	324	292	335
	Actual place of public worship	II C	141	139	159	157
	Cottage and Micro Industries	IIIA (1)	343	302	339	297
	Power looms	IIIA (2)	989	830	963	816
	Industries, IT Services	IIIB	8,481	9,736	8,172	7,770
	Agriculture and Allied Services	IV	17,504	7,002	15,909	6,594
	Miscellaneous/General Purpose	V	7,317	9,791	9,108	10,504
	Construction activities and Temporary Purposes	VI	291	1,016	363	1,059
	Public Charging Station	VII		0	1	1
	Sub Total LT (B)		71,982	53,477	71,747	48,077
	Total HT and LT {A+B} (C)		89,882	74,143	93,380	71,614

*Considering full year's tariff recovery at new tariff

**Revenue is excluding wheeling charges and grants

3.28.2 Revenue at existing Tariff and other government subsidy of FY 2023-24 is taken as per audited annual accounts of FY 2023-24.

3.28.3 TANGEDCO is carrying out SWAP sales and purchase to optimize the power purchase cost. The details of SWAP sales and purchase carried out during FY 2023-24 are as follows-



Petition for True-up of ARR for FY 2023-24

Table 28: Details of SWAP Sales and Purchase

Sales*		Purchases*	
Units in Mus	Amount Rs. In Crores	Units in Mus	Amount (Rs.in Crores)
1,212.65	810.02	186.2	137.79

*SWAP sales and purchases are accounted on notional basis (unit to unit adjustment between other states), hence not included in the ARR

3.29 Summarized ARR and Revenue Gap for FY 2023-24

3.29.1 Based on the above discussion on variable and fixed cost component for Generation function and Fixed Cost related to distribution function, following Table shows the ARR and Revenue Gap summary for FY 2023-24:

Table 29: Aggregate Revenue Requirement of TANGEDCO for FY 2023-24 (Rs. in Crores)

Particulars	Approved	True Up
Power Purchase Cost	34,028	48,130
TANTRANSCO, PGCIL & SLDC charges	8,547	7,624
Generation cost	18,718	24,920
Return on Equity		797
Interest on Loan Capital	4,984	8,129
Depreciation	1,828	2,432
Interest on Working Capital	15	675
Operation and Maintenance Expenses	10,670	11,969
Total Revenue Requirement	78,790	1,04,677
Less: (i) Revenue at Existing tariff	74,143	71,614
(ii) Non-tariff revenue	2,612	6,228
(iii) Other income	1,286	2,786
(iv) Govt. Grant- Loss Funding		17,117
(v) Other Govt. Grant (Cyclone Funds)		13
Gap	749	6,920



Petition for True-up of ARR for FY 2023-24

3.30 Loss Funding received during FY 2023-24:

3.30.1 GoTN has taken up losses for TANGEDCO of Rs. 17,117 crores calculated as 75% of Rs.22,823 crores i.e. Gross Loss for FY 2022-23, that has been received by TNPDC in FY 2023-24. The details are as follows:

G.O.No.	PD Date	Amount (Rs. In Crs)
50/12.07.23	14.07.23	1,500
5/22.01.24	21.01.24	15,617.18
		17,117.18

3.31 Regulatory Assets at the end of FY 2023-24:

3.31.1 GoTN has assured to take up 100% losses as per GO (Ms) No. 38 dt 18/08/2021. Therefore, the Hon'ble Commission is requested to not create any new Regulatory asset for FY 2023-24.



4. PRAYERS

4.1 TNPDCCL respectfully prays to the Hon'ble Commission

- 4.1.1 To condone the delay of 94 days in filing of ARR attributed to finalization of AG certification of accounts due to restructuring of TANGEDCO.
- 4.1.2 To admit the petition seeking True up of FY 2023-24 as per the provisions of TNERC (Terms and Conditions of Tariff) Regulations, 2005 and MYT Regulations, 2009;
- 4.1.3 To approve the actual revenue gap/surplus arising on account of truing-up for FY 2023-24 without creating any regulatory asset for uncovered gap of FY 2023-24 as GOTN has given commitment to take over 100% losses as per RDSS scheme;
- 4.1.4 To pass any other order as the Hon'ble Commission may deem fit and appropriate under the circumstances of the case and in the interest of justice;
- 4.1.5 To grant specific prayers, wherever made in this petition, for reconsideration / relaxation of ARR elements/norms etc.
- 4.1.6 To condone any error/omission and to give opportunity to rectify the same;
- 4.1.7 To permit the Petitioner to make further submissions, addition and alteration to this Petition as may be necessary from time to time.
- 4.1.8 To allow recovering the additional charges in case of any variation in the fixed cost of the Central Government Power Stations as approved by CERC in line with applicable CERC (Terms & Conditions of Tariff) Regulations;
- 4.1.9 To allow recovering the additional cost in case of any change in law notifications issued by GoI and notified by CERC in the tariff of Central Generating Stations and long term Independent Power Projects;
- 4.1.10 To grant any other relief as the Hon'ble Commission may consider appropriate;

k.m.m.a
Signed before me

[Signature]
Chief Financial Controller
Regulatory Cell (FAC)
TNPDCCL
144, Anna Salai, Chennai-2

Distribution - Actual Capital Expenditure incurred and Capitalisation during FY 2023-24 (Rs. in Crs.)													
S.No	Name of the Region/Circle	Expenditure incurred upto previous year		Expenditure incurred during the quarter (01.04.2023 to 30.06.2023)		Expenditure incurred during the quarter (01.07.2023 to 30.09.2023)		Expenditure incurred during the quarter (01.10.2023 to 31.12.2023)		Expenditure incurred during the quarter (01.01.2024 to 31.03.2024)			Total Amount Capitalisation (D)
		Capital expenditure Incurred (A)	Amount Capitalisation (B)	Capital expenditure incurred (C)	Amount Capitalisation (D)	Capital expenditure incurred (C)	Amount Capitalisation (D)	Capital expenditure incurred (C)	Amount Capitalisation (D)	Capital expenditure incurred (C)	Amount Capitalisation (D)	Capital working progress E=(A+C)-(B+D)	
I	Chennai North Region	1159.77	202.90	39.43	7.10	40.86	3.30	33.71	5.41	54.12	12.17	1097.01	27.98
II	Chennai South Region	1155.75	329.21	56.06	5.23	71.35	7.04	64.50	8.07	68.25	24.79	1041.57	45.13
III	Coimbatore Region	1179.44	224.20	18.49	4.54	14.31	7.83	124.68	47.48	109.00	34.11	1127.76	93.96
IV	Erode Region	917.28	189.53	42.09	27.47	49.88	36.39	48.17	32.37	51.88	39.24	784.30	135.47
V	Madurai Region	619.84	159.90	33.16	14.46	38.25	11.77	32.94	16.20	44.49	18.21	548.15	60.64
VI	Tirunelveli Region	970.64	336.31	62.29	46.76	83.79	23.07	52.61	34.33	50.22	31.81	749.29	135.96
VII	Tiruchy Region	478.44	76.52	62.05	13.42	57.77	8.71	71.09	18.30	64.01	33.22	583.18	73.66
VIII	Vellore Region	424.31	171.97	59.82	8.07	52.32	12.63	55.04	9.42	44.89	14.91	419.40	45.03
IX	Villupuram Region	517.44	0.00	30.71	2.14	23.67	8.77	39.47	3.85	34.98	5.92	625.59	20.68
X	Karur Region	435.57	49.69	26.14	13.08	26.46	12.15	20.21	4.52	21.67	12.88	439.72	42.64
XI	Tanjavore Region	742.06	119.95	32.86	7.20	40.16	4.61	32.05	2.14	33.45	3.92	744.78	17.87
XII	Tiruvannamalai Region	481.18	113.88	25.39	9.51	38.66	8.96	43.12	10.05	34.63	7.88	472.70	36.40
	Total	9081.72	1974.05	492.53	158.98	537.47	145.23	617.59	192.14	611.59	239.06	8633.45	735.41


 Chief Financial Controller
 Regulatory Cell (FAC)
 TNFDCL
 144, Anna Salai, Chennai-2

Distribution - Actual Capital Expenditure incurred and Capitalisation during FY 2023-24 (Rs. in Crs.)

S. No	Region	Estimate value proposed	Approved by Commission FY 2023-24	Hydro						Expenditure incurred during the quarter (01.01.2024 to 31.03.2024)				Total	
				Expenditure incurred upto previous year		Expenditure incurred during the quarter (01.04.2023 to 30.06.2023)		Expenditure incurred during the quarter (01.07.2023 to 30.09.2023)		Expenditure incurred during the quarter (01.10.2023 to 31.12.2023)		Expenditure incurred during the quarter (01.01.2024 to 31.03.2024)		Capital expenditure incurred (C)	Amount Capitalisation (D)
				Capital expenditure incurred (A)	Amount Capitalisation n (B)	Capital expenditure incurred (C)	Amount Capitalisation n (D)	Capital expenditure incurred (C)	Amount Capitalisation n (D)	Capital expenditure incurred (C)	Amount Capitalisation n (D)	Capital expenditure incurred (C)	Amount Capitalisation n (D)		
1	Tirunelveli Generation Circle	188.84	43.70	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8.18	1.18	8.18	1.18
2	Kundah Generation Circle	129.30	24.75	47.22	4.05	1.80	10.01	0.86	8.18	3.15	0.33	24.72	6.63	6.70	43.24
3	Kadamparai Generation Circle	54.95	17.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.30	-2.30	0.00	2.30
4	Erode Generation Circle Uratchikottai	64.72	31.03	0.00	0.00	0.00	0.00	5.14	0.00	0.00	0.00	3.28	8.42	8.42	0.0026
	TOTAL	437.81	116.73	47.22	4.05	1.80	10.01	6.00	8.18	3.15	0.33	28.20	19.75	23.30	46.72


Chief Financial Controller
Regulatory Cell (PAC)
TNPDC
 144, Anna Salai, Chennai-2

Distribution - Actual Capital Expenditure incurred and Capitalisation during FY 2023-24 (Rs. in Crs.)

S. No	Region	Estimate value proposed	Approved by Commission FY 2023-24	GTS						Expenditure incurred during the quarter (01.01.2024 to 31.03.2024)						Total	
				Expenditure incurred upto previous year		Expenditure incurred during the quarter (01.04.2023 to 30.06.2023)		Expenditure incurred during the quarter (01.07.2023 to 30.09.2023)		Expenditure incurred during the quarter (01.10.2023 to 31.12.2023)		Amount Capitalisation n (D)		Capital expenditure incurred (C)		Capital expenditure incurred (C)	Amount Capitalisation (D)
				Capital expenditure Incurred (A)	Amount Capitalisation n (B)	Capital expenditure Incurred (C)	Amount Capitalisation n (D)	Capital expenditure Incurred (C)	Amount Capitalisation n (D)	Capital expenditure Incurred (C)	Amount Capitalisation n (D)	Capital expenditure Incurred (C)	Amount Capitalisation n (D)	Capital expenditure Incurred (C)	Amount Capitalisation n (D)		
1	Thirumakottai (Kovvilalappal) GTPS	0.00	35.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2	Kuttalam GTPS	70.04	42.09	1.87	1.87	0.92	0.00	0.00	0.00	77.53	0.00	0.00	0.00	0.14	0.00	78.59	0.00
3	Valuthur GTPS	14.00	84.42	0.00	0.00	0.00	0.00	0.00	0.00	14.99	15.35	0.45	0.00	0.45	-0.36	15.44	15.80
4	Basin Bridge GTPS	0.00	0.90	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	TOTAL	84.04	162.41	1.87	1.87	0.92	0.00	0.00	0.00	92.52	15.35	0.45	0.00	0.59	78.23	94.03	15.80


Chief Financial Controller
Regulatory Cell (FAC)
TNPDCL
144, Anna Salai, Chennai-2

Distribution - Actual Capital Expenditure incurred and Capitalisation during FY 2023-24 (Rs. in Crs.)

Thermal																					
S. No	Region	Estimate value proposed	Approved by Commission FY 2023-24	Expenditure incurred upto previous year			Expenditure incurred during the quarter (01.04.2023 to 30.06.2023)			Expenditure incurred during the quarter (01.07.2023 to 30.09.2023)			Expenditure incurred during the quarter (01.10.2023 to 31.12.2023)			Expenditure incurred during the quarter (01.01.2024 to 31.03.2024)				Total	
				Capital expenditure incurred (A)	Amount Capitalisation n (B)	Capital expenditure incurred (C)	Amount Capitalisation n (D)	Capital expenditure incurred (C)	Amount Capitalisation n (D)	Capital expenditure incurred (C)	Amount Capitalisation n (D)	Capital expenditure incurred (C)	Amount Capitalisation n (D)	Capital expenditure incurred (C)	Amount Capitalisation n (D)	Capital expenditure incurred (C)	Amount Capitalisation n (D)	Capital expenditure incurred (C)	Amount Capitalisation n (D)	Capital expenditure incurred (C)	Amount Capitalisation n (D)
1	TTPS	1034.85	411.70	0.00	0.00	6.36	4.31	2.09	1.77	5.19	5.19	12.61	20.86	-5.88	32.13	26.25	32.13				
2	MTPS-I	134.24	426.39	8.48	2.24	0.40	0.00	6.46	0.47	0.42	0.71	2.91	2.25	13.02	3.43	10.21	3.43				
3	MTPS-II	604.54	118.87	13.18	0.00	0.00	0.00	0.22	0.00	0.00	0.00	7.22	8.39	12.23	8.39	7.44	8.39				
4	NCTPS-I	883.79	183.19	250.55	14.48	163.48	0.00	18.77	0.05	22.24	0.18	24.30	0.00	463.63	0.23	227.79	0.23				
5	NCTPS-II	1364.93	839.12	258.55	155.80	5.89	0.00	1.00	2.16	1.23	33.04	6.76	0.45	121.98	35.65	14.88	35.65				
	TOTAL		1979.27	570.76	172.52	176.13	4.31	28.56	4.45	28.08	39.12	53.79	31.94	604.98	79.83	286.57	79.83				


 Chief Financial Controller
 Regulatory Cell (PAC)
 TNPDC
 144, Anna Salai, Chennai-2

Distribution - Actual Capital Expenditure incurred and Capitalisation during FY 2023-24 (Rs. in Crs.)																	
S.N o.	Region	Estimate value proposed	Approved by Commission FY 2023-24	Expenditure incurred upto previous year		Expenditure incurred during the quarter (01.04.2023 to 30.06.2023)		Expenditure incurred during the quarter (01.07.2023 to 30.09.2023)		Expenditure incurred during the quarter (01.10.2023 to 31.12.2023)		Expenditure incurred during the quarter (01.01.2024 to 31.03.2024)				Total	
				Capital expenditure Incurred (A)	Amount Capitalisation (B)	Capital expenditure Incurred(C)	Amount Capitalisation (D)	Capital expenditure Incurred(C)	Amount Capitalisation (D)	Capital expenditure Incurred(C)	Amount Capitalisation (D)	Capital working progress E=(A+C)- (B+D)					
VII	Tiruchy Region																
28	Tiruchy Metro	1726.81	68.25	101.93	28.29	14.83	3.58	17.32	4.49	15.91	4.84	14.03	9.65	113.16	62.09	22.57	
29	Pudukottai	73.83	45.70	101.13	18.31	9.54	0.34	8.00	0.28	28.03	0.37	16.55	0.53	143.42	62.12	1.52	
30	Perambalur	27.55	27.55	137.75	29.92	14.31	1.67	17.49	0.15	14.27	8.09	23.30	19.16	148.13	69.37	29.07	
31	Dindigul	104.44	22.94	137.63	0.00	23.37	7.83	14.96	3.79	12.88	5.00	10.13	3.88	178.47	61.34	20.50	
	Total		164.44	478.44	76.52	62.05	13.42	57.77	8.71	71.09	18.30	64.01	33.22	583.18	254.92	73.66	
VIII	Vellore Region																
32	Vellore	4.00	4.00	134.55	29.83	10.49	1.94	11.28	1.28	10.77	1.64	9.34	3.35	138.39	41.88	8.21	
33	Tirupathur	116.22	33.03	113.76	85.91	9.75	3.90	9.61	10.20	8.52	5.69	9.01	8.32	36.63	36.89	28.11	
34	Krishnagiri	37.64	37.64	176.00	56.23	39.60	2.23	31.43	1.15	35.75	2.09	26.54	3.24	244.38	133.32	8.71	
	Total		74.67	424.31	171.97	59.84	8.07	52.32	12.63	55.04	9.42	44.89	14.91	419.40	212.09	45.03	
IX	Villupuram Region																
35	Cuddalore	144.66	144.66	402.54	0.00	30.02	1.21	21.61	1.79	13.03	1.01	12.8	2.99	473.00	77.46	7.00	
36	Villupuram	65.93	65.93	114.90	0.00	0.69	0.93	2.06	6.98	26.44	2.84	22.18	2.93	152.59	51.37	13.68	
	Total		210.59	517.44	0.00	30.71	2.14	23.67	8.77	39.47	3.85	34.98	5.92	625.59	128.83	20.68	
X	Karur Region																
37	Namakkal	50.80	50.80	229.88	0.00	16.74	7.56	14.56	5.30	12.34	3.51	10.66	7.02	260.79	54.30	23.39	
38	Karur	75.70	75.70	205.69	49.69	11.40	5.52	11.90	6.85	7.87	1.01	11.01	5.86	178.93	42.17	19.25	
	Total		126.50	435.57	49.69	28.14	13.08	26.46	12.15	20.21	4.52	21.67	12.88	439.72	96.47	42.64	
XI	Tanjavore Region																
39	Tanjavore	197.67	66.07	282.82	6.03	17.99	1.68	15.6	1.05	11.64	0.77	15.92	0.05	334.39	61.15	3.55	
40	Nagapattinam	45.78	45.78	188.21	48.67	8.69	1.56	12.1	1.53	11.63	0.88	7.20	1.18	174.01	39.62	5.15	
41	Tirunelveli	40.13	40.13	271.03	65.25	8.20	3.96	12.46	2.03	8.78	0.49	10.33	2.69	236.38	39.77	9.17	
	Total		151.98	742.06	119.95	34.88	7.20	40.16	4.61	32.05	2.14	33.45	3.92	744.78	140.54	17.87	
XII	Tiruvannamalai Region																
42	Dharmapuri	119.10	23.22	214.44	38.40	9.45	0.54	13.31	2.21	8.53	0.75	10.34	2.03	212.14	41.63	5.53	
43	T.V. Malai	365.15	46.50	195.97	75.48	3.49	0.63	16.02	1.73	23.03	4.39	11.00	3.00	164.28	53.54	9.75	
44	Kallakurichi	108.78	108.78	70.77	0.00	12.45	8.34	9.33	5.02	11.56	4.91	13.29	2.85	96.28	46.63	21.12	
	Total		178.50	481.18	113.88	25.39	9.51	38.66	8.96	43.12	10.05	34.63	7.88	472.70	141.80	36.40	
	Grand Total		2193.05	9081.72	1974.05	494.53	158.98	537.47	145.23	617.59	192.14	611.59	239.06	8633.45	2261.18	735.41	



 Chief Financial Controller
 Regulatory Cell (FAC)
 TNPDCL
 144, Anna Salai, Chennai-2

Distribution - Actual Capital Expenditure incurred and Capitalisation during FY 2023-24 (Rs. in Crs.)																
S.N o.	Region	Estimate value proposed	Approved by Commission FY 2023-24	Expenditure incurred upto previous year		Expenditure incurred during the quarter (01.04.2023 to 30.06.2023)		Expenditure incurred during the quarter (01.07.2023 to 30.09.2023)		Expenditure incurred during the quarter (01.10.2023 to 31.12.2023)		Expenditure incurred during the quarter (01.01.2024 to 31.03.2024)				Total
				Capital expenditure Incurred (A)	Amount Capitalisation (B)	Capital expenditure incurred(C)	Amount Capitalisation (D)	Capital expenditure incurred(C)	Amount Capitalisation (D)	Capital expenditure incurred(C)	Amount Capitalisation (D)	Capital expenditure incurred(C)	Amount Capitalisation (D)	Capital working progress E=(A+C)- (B+D)		
I	Chennai North Region															
1	Chennai Central	551.95	26.52	92.90	82.91	16.49	5.95	12.65	2.68	9.84	2.09	11.49	4.07	45.67	50.47	
2	Chennai North	13.40	13.40	535.10	73.08	10.37	0.49	15.16	0.58	13.35	3.18	25.53	6.30	515.88	64.41	
3	Chennai West	321.41	15.60	531.77	46.91	12.57	0.66	13.05	0.04	10.52	0.14	17.1	1.8	535.46	53.24	
	Total	886.76	55.52	1159.77	202.90	39.43	7.10	40.86	3.30	33.71	5.41	54.12	12.17	1097.01	168.12	
II	Chennai South Region															
4	Chennai South-I	2334.76	168.17	642.81	91.47	2.54	0.05	21.33	0.22	18.17	0.19	16.09	5.808	603.20	58.12	
5	Chennai South-II	1135.71	129.83	67.28	9.25	27.26	1.03	25.06	0.00	21.18	2.46	25.50	0.00	153.55	99.00	
6	Kanchipuram	179.75	28.7	211.91	88.90	10.49	3.31	8.4	0.93	8.59	0.58	10.26	6.72	149.22	37.74	
7	Chengalpatt	224.82	59.19	233.74	139.59	15.77	0.84	16.56	5.89	16.56	4.84	16.4	12.26	135.61	65.29	
	Total	3875.04	385.89	1155.75	329.21	56.06	5.23	71.35	7.04	64.50	8.07	68.25	24.79	1041.57	260.15	
III	Coimbatore Region															
8	Coimbatore North	68.23	68.23	82.20	21.62	0.14	0.10	0.33	0.22	21.47	2.29	31.12	12.06	98.97	53.06	
9	Coimbatore South	30.92	30.92	214.86	33.08	9.68	0.73	5.26	3.27	19.33	13.56	11.32	12.32	197.50	45.59	
10	Coimbatore Metro	68.95	68.95	85.30	23.85	5.12	1.23	3.45	1.16	10.67	0.52	9.90	0.75	86.93	29.14	
11	Tirupur	39.1	39.1	115.11	75.28	1.26	0.95	1.72	1.01	25.23	9.02	13.60	2.88	67.78	41.81	
12	Udumalpet	64.47	64.47	68.21	37.67	0.98	0.62	1.44	1.25	20.21	8.00	13.10	1.44	54.96	35.73	
13	Palladam	54.45	54.45	540.64	22.04	0.85	0.77	1.01	0.86	24.20	14.01	18.81	2.16	545.68	44.87	
14	Nilagiri	7.00	7.00	73.12	10.67	0.46	0.14	1.10	0.06	3.57	0.08	11.15	2.50	75.96	16.28	
	Total	333.12	333.12	1179.44	224.20	18.49	4.54	14.31	7.83	124.68	47.48	109.00	34.11	1127.76	266.48	
IV	Erode Region															
15	Erode	29.57	29.57	326.79	69.06	7.11	11.00	9.39	15.13	5.35	14.34	13.40	13.81	238.70	35.25	
16	Gobi	46.52	46.52	129.18	0.00	7.77	1.41	7.61	0.46	9.64	3.22	10.10	6.56	152.65	35.12	
17	Mettur	54.36	32.17	335.85	120.47	12.96	9.53	12.8	9.68	12.95	9.60	13.04	9.33	228.99	51.75	
18	Salem	33.40	33.40	125.46	0.00	14.25	5.53	20.08	11.12	20.23	5.21	15.34	9.54	163.96	69.90	
	Total	141.66	141.66	917.28	189.53	42.09	27.47	49.88	36.39	48.17	32.37	51.88	39.24	784.30	192.02	
V	Madurai Region															
19	Sivagangai	233.56	75.04	166.50	34.37	8.29	1.01	11.63	0.78	7.88	0.62	7.05	1.34	163.23	34.85	
20	Theni	156.19	36.15	198.75	73.55	9.64	5.89	11.55	7.31	8.96	8.43	6.93	8.14	132.51	37.08	
21	Madurai Metro	156.94	44.83	69.78	11.87	2.32	2.89	3.15	3.13	2.23	1.67	4.86	4.52	58.26	12.56	
22	Ramnad	160.97	48.90	63.24	40.11	6.65	1.10	6.75	0.06	8.74	5.10	8.41	1.01	46.41	30.55	
23	Madurai EDC	139.20	48.21	121.58	0.00	6.26	3.57	5.17	0.49	5.13	0.38	17.24	3.2	147.74	33.80	
	Total	253.13	253.13	619.84	159.90	33.16	14.46	38.25	11.77	32.94	16.20	44.49	18.21	548.15	148.84	
VI	Tirunelveli Region															
24	Virudunagar	77.21	24.70	273.67	89.67	14.05	1.25	10.71	1.61	10.67	1.00	12.87	1.20	227.24	48.31	
25	Tirunelveli	173.87	30.40	309.15	112.91	14.92	13.86	21.90	12.44	21.93	22.77	17.37	12.75	210.54	76.12	
26	Kanyakumari	148.10	61.95	183.99	80.92	9.46	18.95	17.60	7.68	9.60	8.57	9.26	14.03	99.77	45.92	
27	Tutucorin	57.30	0.00	203.83	52.81	25.86	12.70	33.57	1.34	10.42	1.99	10.72	3.83	211.73	80.57	
	Total	117.05	117.05	970.64	336.31	64.29	46.76	83.79	23.07	52.61	34.33	50.22	31.81	749.29	250.92	

Generation - Actual Capital Expenditure Incurred and Capitalisation during FY 2023-24 (Rs. in Crs.)													
S.No	Name of the Region/Cirde	Expenditure incurred upto previous year		Expenditure incurred during the quarter (01.04.2023 to 30.06.2023)		Expenditure incurred during the quarter (01.07.2023 to 30.09.2023)		Expenditure incurred during the quarter (01.10.2023 to 31.12.2023)		Expenditure incurred during the quarter (01.01.2024 to 31.03.2024)			Total Amount Capitalisation (D)
		Capital expenditure Incurred (A)	Amount Capitalisation (B)	Capital expenditure incurred (C)	Amount Capitalisation (D)	Capital expenditure incurred (C)	Amount Capitalisation (D)	Capital expenditure incurred (C)	Amount Capitalisation (D)	Capital expenditure incurred (C)	Amount Capitalisation (D)	Capital working progress E=(A+C)-(B+D)	
I	Thermal Power Plants	570.76	172.52	176.13	4.31	28.56	4.45	28.08	39.12	53.79	31.94	604.98	79.83
II	Gas Turbine Power Stations	1.87	1.87	0.92	0.00	0.00	0.00	92.52	15.35	0.59	0.45	78.23	15.80
III	Hydro Generating Stations	47.22	4.05	1.80	10.01	6.00	8.18	3.15	0.33	12.35	28.20	19.75	46.72
	Total	619.84	178.44	178.85	14.32	34.56	12.63	123.75	54.80	66.73	60.60	702.95	142.35
												Total	877.76


 Chief Financial Controller
 Regulatory Cell (FAC)
 TNPDC
 144, Anna Salai, Chennai-2

Consolidated Power Purchase from Traders Details			
S.No	Sources	Actual Units in MU	
			Actual Amt. (Rs. Crs.)
1	Traders (STOA)		
	NVVN JVPL, Nigire	217.30	184.19
	NVVN JNSTPP	66.71	54.44
	NVVN - ILFS	265.05	219.25
	PTC India Ltd.	250.63	387.68
	Manikaran Energy(Coastal)	677.17	604.94
	Manikaran Energy (KSK)	-	-
	PTC Sembcorp	110.59	93.29
	PTC Simhapuri	52.29	44.32
	PTC Adhunik	35.20	28.73
	Arunachal Pradesh Corporation	-	0.04
	Instinct Infrastructure	-	0.14
	Refex Industries Ltd.	301.88	298.34
	Shree Cement	282.67	285.68
	Sub Total Traders 1	2,259.50	2,201.04
2	Traders (STOA) (Tender)		
	OPG Power Generation Pvt. Ltd.,	141.19	120.19
	Suryadev Alloys and Pwer Pvt. Ltd.,	249.58	212.46
	Sub Total Traders 2	390.77	332.64
3	Traders (MTOA)		
	PTC India Ltd. (Pilot-II DB Power)	746.55	269.36
	PTC India Ltd. (Pilot-II Jai Prakash Power)	428.62	147.89
	PTC India Ltd. (ILFS)	-	144.08
	PTC India Ltd. (Gamalanga)	781.94	335.16
	Sub Total Traders 3	1,957.12	896.49
4	Traders (LTOA)		
	Jindal Case1 Bidding	3,185.16	1,488.06
	Opg Pvt Ltd	338.64	240.77
	Coastal Energen Pvt. Ltd.	2,767.34	1,642.49
	PTC India Ltd.	783.34	381.63
	Dhariwal Infrastructure Ltd.	772.39	326.17
	DB Power Ltd.	1,598.05	743.44
	IL&FS Tamil Nadu Power	3,673.48	2,316.07
	Bharath Aluminium	1,548.97	686.40
	KSK Mahanadi Power	3,776.93	1,914.76
	GMR Energy Trading Ltd.	1,131.34	559.30
	Nvvn Solar	31.20	20.75


 Chief Financial Controller
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 TNPDC
 144, Anna Salai, Chennai-600 002

	Sub Total Traders 4	19,606.84	10,319.84
	Total 1+2+3+4	24,214.23	13,750.02



Chief Financial Controller
Regulatory Cell (FAC)
TNPDC
144, Anna Salai, Chennai-2

FORM-2
BEFORE THE
HON'BLE TAMIL NADU ELECTRICITY REGULATORY COMMISSION
AT CHENNAI

Filing No. :
Case No. : M.P.No. of 2025
In the matter of : Filing of the petition for true up of ARR for
FY 2023-24

Tamil Nadu Power Distribution Corporation Ltd.,
(TNPDC),
N.P.K.R.R Malaigai,
144, Anna Salai,
Chennai -2.

..... Petitioner

Versus

NIL

----- Respondent

Affidavit verifying the Petition


I, S.GIRINATHAN, S/o V.SELVARAJ, aged about 52 years, serving as the Chief Financial Controller/ Regulatory Cell(FAC), Tamil Nadu Power Distribution Corporation Limited (TNPDC) having office at No.144, Anna Salai, Chennai-600002, do hereby solemnly affirm and sincerely state as follows:

2. I am the Chief Financial Controller, Regulatory Cell of the petitioner herein, as such I am well acquainted with the facts of the case and authorized to file the present petition.

3. I solemnly affirm at 5th March on this day of 2025 that the contents of the above petition are true to my knowledge and I believe that no part of it is false and no material has been concealed there from.



Signed before me


Deponent
Chief Financial Controller
Regulatory Cell (FAC)
TNPDC
144, Anna Salai, Chennai-2

TAMILNADU GENERATION AND DISTRIBUTION CORPORATION LIMITED

(Abstract)

TANGEDCO - Authorising the Chief Financial Controller/ Regulatory Cell for filing Petitions, Affidavits, Counter Affidavits, Vakalatnamas and other documents on behalf of the TANGEDCO for the matters pending and arising before any legal forum including the TNERC, CERC, APTEL, High Courts and Supreme Court of India – Approval of the Board of TANGEDCO – Approval accorded by Board of TANGEDCO (By Circulation) - Communicated.

ACCOUNTS BRANCH

Per (FB) TANGEDCO Proceedings No. 13

Dated :. 24.11.2022

Subakiruthu Aandu, Karthigai 8 ,
Thiruvalluvar Aandu 2053.

READ: Approval accorded by Board of TANGEDCO by Circulation

PROCEEDINGS:

BOARD of TANGEDCO hereby accords approval for the following:

- (1) To authorize the Chief Financial Controller/ Regulatory Cell/Tamil Nadu Generation and Distribution Corporation Limited to do the following acts on behalf of the Tamil Nadu Generation and Distribution Corporation Limited in respect of matters related to Regulatory Cell:
 - a) To appear and act in all the Courts, whether Original or Appellate side, and in all Tribunals/Commissions and to sign Vakalatnamas in such proceedings on behalf of the Board and the Chairman and Managing Director;
 - b) To sign and verify complaints/written statements, affidavits/counter affidavits/counter statement, petitions, Memorandum of Appeals in such cases and to file them in such Courts or Tribunals and Commissions; and
 - c) To do any act that may be necessary and incidental for the above mentioned purpose.

AND THE BOARD hereby agrees that all acts, deed and things lawfully done by its attorney, namely, the Chief Financial Controller/ Regulatory Cell, Tamil Nadu Generation and Distribution Corporation Limited shall be construed as acts, deeds and things done by the Board and the Board hereby undertakes to ratify and confirm all and whatsoever that the Board's said attorney shall lawfully do or cause to be done for the Board by virtue of the power hereby given.

(By order of the Board of TANGEDCO)

Sd/..24.11.22

B.RAJESWARI

CHIEF FINANCIAL CONTROLLER
REGULATORY CELL/TANGEDCO

To

The Chief Financial Controller / Regulatory Cell/TANGEDCO/Chennai-2

Copy submitted to the Managing Director/TANTRANSCO, Chennai-2

Copy submitted to the Director/Finance, TANGEDCO, Chennai-2

Copy submitted to the Director/Distribution, TANGEDCO, Chennai-2.

Copy submitted to the Director/Generation, TANGEDCO, Chennai-2

Copy submitted to the Director/Projects, TANGEDCO, Chennai-2

Copy submitted to the Director/Operation/TANTRANSCO, Chennai-2

Copy to:

The Secretary/Secretariat Branch, TANGEDCO, Chennai-2

The Chief Financial Controller/General, TANGEDCO, Chennai-2

The Chief Financial Controller/Revenue, TANGEDCO, Chennai-2

The Chief Engineer/Planning, TANGEDCO, Chennai-2

The Chief Engineer/Operations/TANTRANSCO, Chennai-2

The Chief Engineer/Projects, TANGEDCO, Chennai-2

The Superintending Engineer/CERC, TANGEDCO, Chennai-2

Copy to the Executive Assistant, O/o CMD/TANGEDCO, Chennai-2

A10 Section, Secretariat Branch, TANGEDCO, Chennai-2- 2 copies

B.P. Section, Administrative Branch, TANGEDCO, Chennai-2-2 copies

// FORWARDED BY ORDER //

[Signature] 24/11/22
EXECUTIVE ENGINEER/CERC