Table 2-4: Estimated Revenue (Gap)/Surplus for FY 2022-23 (Rs. Crore)

Sr. No.	Particulars	2022-23 (Projected)
1	Aggregate Revenue Requirement	18,469.61
2	Less: Revenue Gap from True up of FY 2020-21	(632.64)
3	**Total Aggregate Revenue Requirement**	**19,102.25**
4	Revenue with Existing Tariff	12,563.02
5	FPPPA Charges @ Rs.1.80/Unit	5,605.31
6	Other Income (Consumer related)	306.33
7	Agriculture Subsidy	423.71
8	**Total Revenue including Subsidy (4 to 7)**	**18,898.37**
9	**Revenue (Gap)/Surplus (8-3)***	**(203.88)**

***Note**: PGVCL in data gaps reply, has revised 'Revenue (Gap)/Surplus' to Rs.(233.44) Crore.

2.6 Proposed Changes in the Tariff Structure for FY 2022-23

PGVCL submitted that the consolidated Revenue (Gap)/Surplus for all four distribution companies is Rs. (568) Crore, which can be met through efficiency improvement measures. In view of the above, the distribution companies have not proposed any increase in tariff rates or any modifications in current tariff structure for FY 2022-23.

2.7 Request of PGVCL

1. To admit this Petition seeking True up of FY 2020-21, Aggregate Revenue Requirement for FY 2022-23 and Tariff Proposal for FY 2022-23.
2. To approve the True up for FY 2020-21 and allow sharing of gains/ (losses) with the Consumers as per sharing mechanism prescribed in the GERC MYT Regulations, 2016.
3. To allow recovery of Revenue (Gap) / Surplus of FY 2020-21 as part of Tariff determination for FY 2022-23.
4. To approve Aggregate Revenue Requirement for FY 2022-23 as submitted by

the Petitioner.

5. To consider approved True up parameters & ARR of GSECL, GETCO and SLDC while finalizing Tariff of the Petitioner.
6. Pass suitable orders for implementation of Tariff Proposal for FY 2022-23 for making it applicable from 1st April, 2022 onwards.
7. To grant any other relief as the Hon'ble Commission may consider appropriate.
8. The Petitioner craves leave of the Hon'ble Commission to allow further submissions, addition and alteration to this Petition as may be necessary from time to time.
9. 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.

3 Brief Outline of objections raised, response from PGVCL and Commission's view

3.1 Public Response to the Petition

In response to the Public Notice inviting objections/ suggestions on the petitions filed by DISCOMs for Truing up of FY 2020-21 and determination of tariff for FY 2022-23 from the stakeholders, a number of stakeholders filed their objections/suggestions in writing and also participated in the Public Hearing. Further, some of the objections are general in nature and some are specific to the proposals submitted by the petitioner. It is also noted that many of the objections/suggestions are common to all the four DISCOMs and some are specific to the concerned DISCOM. The objections/suggestions connected with the current petition are segregated into two groups, viz., common to all DISCOMs and specific to the concerned DISCOM. The Commission has addressed the objections/ suggestions issue-wise rather than objector-wise.

These objections/suggestions, the response from the petitioner, and the views of the Commission are dealt with hereunder:

3.2 Suggestions/ Objections common to all DISCOMs

Issue No. 1: Lack of Transparency and Undisclosed Crucial Information

The objector submitted that the petitions filed by the petitioner lack transparency, as crucial information relevant for True-up of FY 2020-21 and tariff determination process is not disclosed. Further, the petitioners have also failed to comply with directions issued by the Commission in the previous Tariff Order. Since, the Tariff is common for all State DISCOMs, consolidated formats for all 4 DISOCMs should be given.

When any person purchases the copy of the petition from petitioner, CD of MS Excel format should be given for analysis of data. It is requested to fix the minimum font size for documents to be provided to the respondents and to be submitted to the Commission by petitioners and respondents because petitioners provide data in such small fonts that it cannot be read easily.

Article 19 of the Indian Constitution provides the right to be informed. DISCOMs and GUVNL should be directed to provide all data, PPAs, etc. on their website for easy downloading. The Tariff schedule part should also be provided in Gujarati language.

The objector submitted that petitioners have knowingly avoided to give consolidated tariff formats for all four Companies together like category-wise sales, revenue in terms of absolute amount and per unit basis, etc. along with the petitions. In case consolidated tariff format is provided, it would be possible for the general public to verify and analyse the consolidated gap/ surplus position claimed by the petitioners.

Response of the Petitioners

The petition has been filed following the principles, methodology and norms of the EA 2003 and GERC (MYT) Regulations, 2016. The information as required under the GERC (MYT) Regulations is duly provided along with the petition. Further, other relevant information is also available on petitioner's website.

Commission's view

The petition for true-up of FY 2020-21 and determination of ARR and tariff for FY 2022-23 has been filed by the petitioner in accordance with the Suo-Motu Order of the Commission in this regard dated 24th September, 2021. The Commission has ensured that the petitions have been filed as per the principles laid down by the Commission in the GERC (MYT) Regulations, 2016. Further, information submitted subsequently by the petitioner is also made available to the stakeholders on the website of the DISCOMs.

Issue No. 2: Agricultural Sales and Revenue

The respondent submitted that the sales and revenue projected for FY 2022-23 have not followed the pattern of actual sales and revenue for FY 2020-21. It is submitted that for unmetered agricultural consumer category, the consumption is considered on the basis of hours of power supply irrespective of use by individual consumer as compared to the power supplied to metered agricultural consumers.

DISCOMs have installed 100% DTC metering and hence, it is possible to evaluate the actual consumption for AG dominant feeder. If at all no such exercise is made, the expense of DTC metering for AG dominant feeder is a burden to other non-subsidized category.

It is submitted that energy sales of unmetered Agriculture consumers do not correspond to the sales of metered Agriculture consumers. Also, revenue from Agriculture category shown in petition does not tally with RIMS Report. There is huge difference in Average Cost of Supply (ACoS) of AG category and revenue realised from this category.

The petitioner has submitted that the government provides subsidy for tariff compensation/FPPPA for metered and unmetered category. The agricultural subsidy is to be paid in advance, however, it was submitted in the past that the same is yet to be received from the Government. Also, subsidy to AG Consumer should be given on per unit basis and directly to consumers' bank account.

Response of the Petitioners

DISCOMs have submitted that sales of metered AG consumers are affected due to theft/ malpractice. In case of unmetered consumers, there is no incentive for energy conservation. As regards the assessment of unmetered Agriculture consumers, the norms of 1700 Units/HP/Annum is derived on the detailed study assessment undertaken by Expert Committee, namely, Dr P.K. Misra Committee, wherein the Committee has analysed consumption patterns and consumption parameters in detail, and recommended the assessment of 1700 per HP per Annum for unmetered agricultural connections in a scientific manner. Also, study was undertaken by TERI for assessing the consumption of unmetered Agriculture consumers. Therefore, there is no justification to raise any issue with regard to the normative consumption assessment considered for un-metered agriculture consumers.

The average realization from almost all categories for FY 2020-21 is within ± 20% of the ACoS except Railways and Agriculture category. In case of Agricultural consumers, as per the decision of the Government of Gujarat, the FPPPA charges payable by Agriculture consumers are not recovered from the consumers but is being compensated by the State Government as a subsidy support to agriculture consumers.

The FPPPA subsidy received from the State Government has been duly considered in the revenue from sale of power for respective category of consumers, both in Annual Accounts and also in the True up petition.

Further, the tariff for Unmetered category is always higher than Metered category so as to incentivize the Unmetered category for installation of Meter.

Commission's view

The response of the petitioners is noted.

Issue No. 3: Distribution losses

The objector submitted that the data submitted by the petitioners is not correct. The data needs to be verified by the Commission based on the energy supplied by GETCO at periphery of the State DISCOMs and data of Energy sold at Distribution Transformer level of these four DISCOMs for the year to ascertain the actual level of losses.

In case of DGVCL, losses are still high for even Urban feeders whereas, in case of PGVCL, no details are provided. Therefore, it is necessary to segregate the sales booked between actual metered units and assessed units, mainly for agriculture consumers to ascertain the losses. The Commission should compare the consumption registered in the DT Meters installed for Agriculture consumers with assessed units booked in the sales, which is necessary to ascertain the actual level of losses.

DISCOMs should be directed to submit details of consumption registered in express agriculture feeder and compare it with assessed consumption on the same feeder.

It is submitted that except PGVCL, all three DISCOMs have proposed higher Distribution losses for FY 2022-23 compared to actual loss level achieved during FY 2020-21. The objective of EA 2003 and GERC (MYT) Regulations, 2016 is to improve the performance efficiency of DISCOMs on year-on-year basis and to pass on the benefits of cost reduction on account of improved efficiency to the consumers. Therefore, the Commission is requested to not allow distribution losses claimed by UGVCL, MGVCL and DGVCL. The Commission should approve the losses as per actual losses of FY 2020-21 while approving power purchase cost for FY 2022-23.

The objector submitted that as per the Tariff Policy and MYT framework and principles, the trajectory should be given for the distribution losses. Distribution loss is a controllable factor. The Commission is requested to set the trajectory of controllable and uncontrollable factors on the basis of the best levels achieved by DISCOMs in the past years so that tariff can be reduced and efficiency can be brought into the system.

Response of the Petitioners

As regards assessment of unmetered agriculture category, the normative consumption as approved by the Commission for FY 2020-21 is considered.

For reduction of distribution losses by the DISCOM, various activities are planned, such as:

- Maintenance and replacement of conductor and cables with proper size;
- Providing amorphous transformers and load balancing activities and relocating the distribution transformer in load centre;
- Bifurcating all feeders as per system requirement;
- Removal of joints in lines / cables;
- Releasing of new AG connections preferably with HVDS to reduce LT line losses, etc.

For reduction of commercial losses, following activities are undertaken:

- Vigilance activities and regular checking drives to curb the power theft;
- Providing Aerial Bunch Conductor /insulated conductor / XLPE cable and armoured cables to eliminate power theft by direct hooking;
- Replacing services having joints, provide meters outside at the entrance of premises;
- Replacing electromechanical meters by static meters;
- Replacing faulty/burnt meters and making all installation pilferage proof;
- Consumption monitoring specifically for high value consumers.

The efforts for reduction of distribution losses will be continued and will be enhanced. However, loss reduction is a slow process and becomes increasingly difficult as the loss levels go further down.

Distribution Loss of Agriculture category is highly influenced by the amount and spells of rainfall, etc. However, with the continuous efforts and expeditious release of new connections, the loss of agriculture category has also reduced. Moreover, during FY 2020-21, many of the activities could not be performed due to COVID-19 pandemic and consumption mix has also changed and, therefore, not much reduction in distribution loss is achieved.

As regards projected distribution losses for FY 2022-23, it is submitted that the Distribution losses of FY 2020-21 are abnormal on account of meter reading / energy accounting issues due to outbreak of COVID-19 pandemic at the end of financial year. Therefore, realistic approach has been considered for estimating distribution losses for FY 2022-23.

Commission's view

The Commission has noted the efforts made by the petitioners. However, loss reduction activity being continuous, sustained and concerted efforts should be made to reduce the losses in coming years also. The Commission has allowed the distribution losses based on approved sales for FY 2020-21.

As regards distribution losses for FY 2022-23, the Commission noted that DGVCL, UGVCL and MGVCL have proposed Distribution Losses for FY 2022-23 higher than actual Losses of FY 2020-21 citing probability of increase in Open Access sales, increasing trend of Losses in Urban and JGY categories on account of affected financial health post lock down era, day time power supply to AG consumers under SKY scheme and more than 8 hours of Power supply to AG consumers on account of delayed/poor monsoon. Also, Distribution losses projected by DISCOMs are higher than Distribution losses approved for FY 2021-22. Considering the actual distribution losses incurred during past years with respect to the approved distribution losses, and the capital investments being made regularly by DISCOMs, the Commission does not find any rationale in allowing distribution losses higher than that approved for FY 2021-22. The Commission has approved distribution loss for FY 2022-23 same as approved for FY 2021-22, except for UGVCL where distribution loss of 7.00% has been allowed.

Issue No. 4: Accounting for Dumped Energy

The respondent has submitted that inadvertent flow of energy is inevitable phenomena on account of the Open Access consumers and other energy suppliers who are deviating from the schedule of use of consumption. Such dumped energy on account of inadvertent flow is also one of the sources of power supply at no cost. Therefore, the Commission should ensure that such energy is also accounted and not be considered for showing the efficiency in reduction of loss.

Response of the Petitioners

The petitioner has submitted that the "Overall Distribution loss" are worked out based on input energy recorded in the "Energy Meters" provided at "Feeder Level" (i.e., energy input in the system) and energy recorded in the "Consumers Meter" which includes all types of energy transaction due to wheeling of power under Open Access. Further, energy accounting for wheeled energy under Open Access and treatment for surplus energy is carried out in accordance with applicable Orders / Regulations of the Commission.

Commission's view

The Commission has noted the response of the petitioners. Difference of energy scheduled and drawn by the Open Access consumers is an inadvertent flow into the infinite grid.

Issue No. 5: Power Purchase Cost of FY 2020-21

It is submitted that the cost of power purchase should be reduced as the Fixed and Variable charges of each generator/power supplier is prefixed and the purchase amount has also increased while the energy sales has been reduced by 7058 MUs. According to approved power purchase cost per unit, power purchase cost should have reduced by Rs.36,809 Crore, however, it has increased by Rs.37,809 Crore for FY 2020-21.

In the True up petition, power purchase cost should be worked out for each DISCOM based on BST rate approved in the MTR Order.

- **Variation in Power purchase cost as per FPPPA submission and as per Annual account**

The petitioners have claimed higher amount of power purchase expenses by Rs. 948 Crore in their FPPPA claims for FY 2020-21. It is requested that thorough examination of power purchase expenses of petitioners' vis-a-vis power purchase expenses claimed as part of FPPPA submission should be done by the Commission. Therefore, the Commission is requested to consider recovery of carrying cost for the additional amount of Rs. 948 Crore recovered by the petitioners through FPPPA.

- **Discrepancies in the Power Purchase Cost claimed in the petitions and Power Purchase cost as per Annual Accounts**

The power purchase cost for FY 2020-21 is reduced by amount of Rs. 2015 Crore being provision made during FY 2020-21.

Power purchase provisions during FY 2020-21 as stated in the Accounts is Rs. 2622 Crore instead of Rs. 2015 Crore shown in the petitions. Therefore, the Commission is requested to reduce the power purchase cost by Rs. 2622 Crore for FY 2020-21 instead of Rs. 2015 Crore.

- **Purchase of power from short term market and levy of Additional Surcharge:**

The stand of GUVNL is that they have stranded generating capacity (surplus capacity) and therefore, there is a need to levy Additional Surcharge from open access consumers. Contrary to this, the power purchase cost details submitted by the petitioners clearly indicates that they have purchased huge quantum of power from the short-term market. DISCOMs are procuring power from short term market hence, there is no stranded capacity and hence, there should not be any Additional Surcharge to be levied. The Commission is requested to take serious note of this and restrain the DISCOMs from recovering Additional Surcharge.

- **Bulk Supply Tariff (BST) rate in True up petition**

The Commission has approved the Bulk Supply Tariff (BST) and its working mechanism for allocation of power purchase cost incurred by Co-petitioner among the petitioners. As per the petition, no detail is given as to how the total power purchase cost incurred by GUVNL is allocated to the petitioner companies. As per UGVCL petition, the power purchase cost for UGVCL for FY 2020-21 is Rs. 10949 Crore for 25819 MUs. The methodology to calculate the BST rate is not clear.

- **DSM payments and UI Units**

It is submitted that for UGVCL, there was net deviation of 714 MUs for FY 2020-21, which constitutes around 3% of schedule. Further, the amount received towards DSM charges is Rs. 158.57 Crore, i.e., Rs. 2.22/unit and average power purchase cost is around Rs. 4.24 per unit. So, loss of Rs. 2.02/unit, which amounts to Rs. 144 Crore for UGVCL only. For PGVCL, DSM receivable rate is Rs. 2.02/unit (Rs. 637 MUs at Rs. 137 Crore). In case of MGVCL and DGVCL, the DSM Charges are net payable at Rs. 3.26/unit and Rs. 4.80/unit, respectively.

It is requested to consider appropriate treatment in true-up of FY 2020-21 on account of loss of revenue due to issues in demand forecasting and scheduling of power.

- **Increase in Tariff due to FPPPA Charges**

It is submitted that for FY 2020-21, the approved FPPPA charges was Rs. 1.59/Unit as against which the actual FPPPA charges went as high as Rs. 2.00/Unit (in Quarter-1), that is increase in charges by Rs. 0.41/Unit, which is higher by around 26%. It is requested to revise the existing norms and practice of allowing FPPPA charges without involvement of consumers. Accordingly, the objector requested the Commission to allow consumer participation in case there is need for significant increase in FPPPA charges.

- **True up of GUVNL Expenses**

Information was sought in regard to the true up expenses and revenue of GUVNL.

Response of the Petitioners

The power purchase cost for FY 2020-21 was approved by the Commission in the MTR Order dated 24th April, 2019, which was based on actual power purchase cost of FY 2016-17. Increase in Power Purchase Cost during FY 2020-21 was on account of uncontrollable factors such as increase in fuel cost, change in generation mix and increase in sales quantum, etc.

Point wise reply to other objections is as below:

- **Variation in power purchase cost as per FPPPA submission and as per Annual account**

As per the directive of the Commission, FPPPA is claimed based on actual payment made during respective quarter whereas Annual Accounts are prepared on accrual basis as per the Indian Accounting Standards (IND- AS), which includes undischarged liabilities or provisions.

- **Discrepancies in the power purchase cost claimed in the petitions and Power Purchase cost as per Annual Account**

The provision for amount of Rs. 2015 Crore is related to payment liability as per the Judgment of the Hon'ble Supreme Court and the amount is provided on best estimation basis as the liability is yet to be quantified by lower court/forum.

- **Purchase of power from short term market and levy of Additional Surcharge:**

It is submitted that levy of Additional Surcharge and purchase of power from short-term market are entirely independent aspects. The Additional Surcharge is levied as per the formula approved by the Commission and after demonstrating the stranded power purchase cost. Procurement from short-term market is to optimise the power purchase cost. Stranded Capacity is due to consumers sourcing power from other sources.

- **BST rate in True up petition**

The Commission has approved the BST mechanism in the MYT/MTR orders. Thus, power purchase cost incurred by GUVNL for FY 2020-21 is allocated to individual DISCOM accordingly.

- **DSM payments and UI Units**

The rate of DSM/ UI units varies time to time as it is linked with the frequency, therefore, rates paid / received under DSM cannot be compared with the average power purchase cost of the Company. DSM mechanism is for creating discipline. DSM charges are payable as well as receivable. The petitioners are making all the efforts to optimize the DSM/ UI liabilities.

- **Increase in Tariff due to FPPPA Charges**

As per the provisions of the Tariff Policy, any increase in the Power Purchase cost vis-a-vis power purchase cost approved by the Commission in the DISCOM's ARR/ MYT petition, is to be recovered from consumers through FPPPA charges on quarterly basis.

There has been increase in power purchase cost during FY 2020-21 on account of uncontrollable factors such as increase in fuel cost / power purchase rate and change in generation mix.

- **True up of GUVNL Expenses**

Pursuant to restructuring of the erstwhile Gujarat Electricity Board, the function of bulk purchase of power on behalf of four DISOCMs is carried out by GUVNL. As per the MTR order, GUVNL is entitled to claim trading margin of Rs. 0.04 / Unit.

However, GUVNL has instead of claiming any trading margin, allocated less power purchase cost to the tune of Rs. 433 Crore to DISCOMs for FY 2020-21.

Commission's view

The response of the petitioners is noted. The details and the reasons have been provided as mentioned above. The power purchase cost for FY 2020-21 was approved by the Commission in the MTR Order dated 24th April, 2019.

In reply to queries, DISCOMs have provided the reconciliation for Power Purchase Cost as claimed in the petition with the Power Purchase Cost as submitted under

FPPPA and Additional Surcharge submission to the Commission as detailed in the relevant para of the Order. The Commission has found the reconciliation submitted by DISCOMs in order. As regards variation on actual power purchase cost for FY 2020-21, the Commission has examined the prudence of power purchase cost in accordance with MYT Regulations, 2016. The analysis of the Commission on power purchase cost for FY 2020-21 is discussed in the subsequent chapters of this Order.

Issue No. 6: Power Purchase Cost for FY 2022-23

The objector submitted that the petitioners will be in power deficit position during FY 2022-23 and accordingly, have proposed to purchase significant quantum of energy from short-term sources. The purchase of power from Power Exchange is shown as 6166 Mus whereas from short-term-bilateral, it is 2000 Mus. Therefore, the total short-term purchase is shown as 8166 Mus, which is 8% of the total energy requirement and no detail of bilateral sources is provided for purchase of 2000 MUs by the petitioners for FY 2022-23 specifically when such huge quantum is proposed to be purchased without long-term tie-up.

It is requested that the Commission may approve purchase of 8166 MUs from Power Exchange and bilateral short-term sources with a specific condition that henceforth, the petitioners will not be entitled for levy of Additional Surcharge for Open Access consumers for FY 2022-23.

The objector submitted that as per the petitions, the power purchase cost for FY 2021-22 would be on lower side by Rs.0.33/unit as compared to actual power purchase cost of FY 2020-21. However, no information has been given to justify the same. Power purchase cost for FY 2022-23 is projected as 4.48/unit whereas it is 4.81/unit for FY 2020-21. Thus, lower power purchase cost is projected for FY 2022-23 to recover the actual power purchase cost through FPPPA without public hearing.

Response of the Petitioners

Estimation of purchase of power through short-term arrangement for FY 2022-23 is based on present market condition with an objective to economize overall power purchase cost specifically to minimise the costlier power purchase from gas-based power stations. The petitioners already have power purchase arrangement on long-term basis having fixed cost payment liabilities.

As regards the power purchase cost, the scenario for FY 2020-21 is entirely different compared to estimated scenario for FY 2022- 23 in terms of generation mix, availability of power stations, energy balance, demand and supply scenario and is not comparable. Therefore, it is not appropriate to compare the per unit power purchase cost of FY 2020-21 and estimated power purchase cost of FY 2022-23.

Commission's view

As regards short-term power purchase for FY 2022-23, the Commission has noted that DISCOMs have proposed to purchase 8166 MUs of energy through Power Exchange. The Commission has deducted the unmet RPO purchased from GTAM from the power proposed to be purchased from the Power Exchange. The net power purchase from Power Exchange is worked out to be 4366 MUs for FY 2022-23, which is around the same level as in FY 2020-21. The detailed analysis undertaken by the Commission for approval of power purchase cost for FY 2020-21 and FY 2022-23 has been provided in relevant paras of this Order.

Issue No. 7: RPO

Petitioner has projected shortfall of approximately 2000 MUs in non-solar segment. DISCOMs have the option to fulfil their existing RPO obligations as well as future RPO targets by procuring RE power from short-term market through Green-DAM and Green-TAM products available at IEX platform.

Response of the Petitioners

DISCOMs have tied up required RE capacity to meet RPO. DISCOMs are eligible as per the Commission's Order to claim RE attribute of wheeling of RE power by consumers for captive / third-party consumption who are not claiming RE attributes and consumption of rooftop solar consumers. Considering this, as such no shortfall in RPO is estimated for FY 2022-23.

Commission's view

The Commission has approved the procurement of RE power for meeting RPO target for FY 2022-23 and computed unmet RPO of 1800 MUs. For the purpose of the ARR for FY 2022-23, the Commission has considered unmet RPO to be purchased from GTAM at Rs. 4.02 per kWh. However, the DISCOMs should endeavour to purchase the balance RE power to meet the RPO target for FY 2022-23 from the cheapest sources available.

Issue No. 8: Exemption from requirement of Undertaking for Consumers participating in RTM, GTAM and GDAM

As per the Intra-State Open Access Regulations, 2011, a consumer seeking Inter-State short-term Open Access, shall require the consent of Distribution Licensee and SLDC, before giving its consent to the RLDC. It is submitted that since the aforementioned undertaking precludes the consumers from taking advantages of RTM/GTAM, the consumers are denied the option to avail cost effective conventional/RE power.

It is required to revisit the provision related to 24 hours scheduling enforced through Undertaking while seeking Open Access. The Commission is requested to exempt the requirement of Undertaking for consumers participating in these Exchange market segments.

Response of the Petitioners

The petitioner submitted that the procurement of power by the consumer under open access is governed as per Open Access Regulations and Orders.

Commission's view

The Commission has noted the suggestion of the objector. However, the issue raised is not relevant for the present Tariff proceeding.

Issue No. 9: GSECL's old aged Power Stations

It is submitted that the over-aged power stations, which are running at very low PLF should be discarded and its equity should not be allowed. All R&M expenses and establishment expenses should be reduced by GSECL/GUVNL so as to reduce power purchase cost.

The reduction in dispatch of one-third of available MUs give rise to average cost of (Units of GSCEL) as high as Rs.8.07 per unit for FY 2022-23, which is more than double as compared to overall average cost of Rs.3.76 per unit.