

RAJASTHAN ELECTRICITY REGULATORY COMMISSION

Petition No: RERC/2069/2022

In the matter of Truing up of ARR of FY 2021-22 for KTPS (Units 1-7), STPS (Units 1-6), CTPP (Units 1-4), KaTPP (Units 1-2), CSCTPP (Units 5&6), RGTPS (270.50 MW), Mahi Hydel and approval of Aggregate Revenue Requirement (ARR) & Tariff for FY 2023-24 for KTPS (Units 1-7), STPS (Units 1-6), CTPP (Units 1-4), KaTPP (Units 1-2), CSCTPP (Units 5&6), RGTPS (270.50 MW) and Mahi Hydel Power Stations of Rajasthan Rajya Vidyut Utpadan Nigam Ltd.

Coram: **Dr. B.N. Sharma,** **Chairman**
 Sh. Hemant Kumar Jain, **Member**
 Dr. Rajesh Sharma, **Member**

Petitioner: Rajasthan Rajya Vidyut Utpadan Nigam Ltd.

Respondents:

1. Jaipur Vidyut Vitran Nigam Ltd.
2. Ajmer Vidyut Vitran Nigam Ltd.
3. Jodhpur Vidyut Vitran Nigam Ltd.
4. Rajasthan Urja Vikas Nigam Ltd.

Date of hearing: **21.02.2023, 28.03.2023 & 06.04.2023**

Present:

1. Sh. Sandeep Taneja, Advocate for Petitioner
2. Sh. Sandeep Pathak, Advocate for Respondents
3. Sh. G.L. Sharma, Stakeholder
4. Sh. D. D. Agarwal, Stakeholder
5. Sh. Anshuman Singh, BASK, Stakeholder

Date of Order:

12.05.2023

ORDER

1.1 Rajasthan Rajya Vidyut Utpadan Nigam Ltd. (in short 'RVUN'), a Generating

Company under the provisions of the Electricity Act 2003, has filed a Petition for Truing-Up of ARR for FY 2021-22 and approval of Aggregate Revenue Requirement (ARR) and determination of Tariff for sale of electricity from its existing Power Stations to Distribution Companies for FY 2023-24.

1.2 In exercise of the powers conferred under Sections 62, 64 and other provisions of Electricity Act 2003, read with RERC (Terms and Conditions for Determination of Tariff) Regulations, 2019 and other enabling Regulations, the Commission, after carefully considering each of the submissions of the Petitioner and suggestions/objections submitted by the Stakeholder, has passed the following Order.

1.3 This Order has been structured in following sections as given under:

- (1) Section 1: General
- (2) Section 2: Summary of True-Up and Tariff Determination Process.
- (3) Section 3: Summary of objections/comments/suggestions received from Stakeholders/Respondent's and RVUN's response thereon.
- (4) Section 4: Analysis of True-Up of RVUN Stations for FY 2021-22.
- (5) Section 5: Determination of ARR and Tariff for RVUN Generating Stations for FY 2023-24.

SECTION 2

Summary of filing of True-Up and Tariff Determination Process

2.1 In accordance with Regulation 8 and Regulation 11 of the RERC (Terms and Conditions for Determination of Tariff) Regulations, 2019, hereinafter referred to as RERC Tariff Regulations, 2019, RVUN filed a Petition on 08.12.2022 for trueing up of ARR for FY 2021-22 and approval of ARR and determination of tariff for supply of electricity to Distribution Companies for FY 2023-24 in respect of the following Power Stations:

Table 1: RVUN's Generating Stations under True up for FY 2021-22 and under ARR & Tariff Determination for FY 2023-24

SR. No.	Particulars	Capacity (MW)
1	Kota Thermal Power Station (KTPS) (Units 1-7)	1240
2	Suratgarh Thermal Power Station (STPS) (Units 1-6)	1500
3	Chhabra Thermal Power Station (CTPP) (Units 1-4)	1000
4	Kalisindh Thermal Power Station (KaTPP) (Units 1-2)	1200
5	Chhabra Super Critical Thermal Power Station (CSCTPP) (Units 5&6)	1320
6	Ramgarh Gas Thermal Power Station (RGTPS) (270.50 MW)	270.50
7	MahiHydel Power Project (MAHI)	140
Total		6670.50

2.2 As required under Section 64(2) of the Electricity Act, 2003, public notices with salient features of the Petition inviting objections/comments/suggestions were published in the following newspapers on the dates mentioned against each:

Table 2: Details of Newspapers

Sr. No.	Name of News Paper	Date of publishing
(i)	Rajasthan Patrika	24.12.2022
(ii)	Dainik Navjyoti	24.12.2022
(iii)	Times of India	24.12.2022

2.3 The Petition was also placed on the websites of the Commission and the Petitioner. The objections/comments/suggestions were received from Shri. B. M. Sanadhya, D.D. Agarwal, Shri. Manideep Gudela, Prayas Energy Group, Shri. G. L. Sharma, and the Respondents.

2.4 The Commission forwarded the objections/ comments/ suggestions of the

Stakeholder's/Respondents to RVUN for filing its reply.

- 2.5 The Commission vide letter dated 02.01.2023 and email dated 06.04.2023 communicated some data gaps and deficiencies in the Petition. The Petitioner furnished information vide its letter dated 25.01.2023, 31.03.2023, 05.04.2023, 17.04.2023 and 20.04.2023. The Petitioner also replied to the objections/ comments/ suggestions made by the Stakeholder's/Respondents vide its letter dated 17.02.2023.
- 2.6 The public hearing in the matter was held on 21.02.2023, 28.03.2023 and 06.04.2023.
- 2.7 The Commission had approved the tariff for FY 2021-22 for KaTPP (Units 1&2) vide its Tariff Order dated 04.10.2021 (Petition No. 1880/21), for KTPS (Units 1-7), STPS (Units 1-6), CTPP (Units 1-4), RGTPS (270.50 MW) and Mahi Hydel Power Stations vide its Tariff Order dated 15.12.2021 (Petition No. 1872/21) and for CSCTPP (Units 5&6) vide its Tariff Order dated 28.12.2021 (Petition No. 1879/21).
- 2.8 Subsequently, RVUN filed a Review Petition seeking review on the Commission's ruling on some of the issues of the tariff Order dated 04.10.2021 (Petition No. 1880/21), 15.12.2021 (Petition No. 1872/21) and 28.12.2021 (Petition No. 1879/21). The Commission dismissed the Review Petitions vide its Order dated 31.03.2022 (Petition No. 1956/21 & 1987/22) and 23.05.2022 (Petition No. 1990/22).
- 2.9 Further, the Commission had approved the tariff for FY 2022-23 for CSCTPP (Units 5&6) and KTPS (Units 1-7), STPS (Units 1-6), CTPP (Units 1-4), KaTPP (Units 1&2), RGTPS (270.50 MW), Mahi Hydel Power Stations vide its Tariff Order dated 23.06.2022 (Petition No. 1985/22& 1980/22)
- 2.10 Subsequently, RVUN filed a Review Petition seeking review on the Commission's ruling on some of the issues of the tariff Order dated 23.06.2022 (Petition No. 1985/22 & Petition No. 1980/22). The Commission dismissed the Review Petition vide its Order dated 09.11.2022 (Petition No. 2032/22 & 2031/22).
- 2.11 In this Order, the Commission has undertaken the truing up for FY 2021-22 and determination of tariff for FY 2023-24 for RVUN Generating Stations as Petitioned.

SECTION 3

Summary of objections/comments/suggestions received from Stakeholders/ Respondents and RVUN's response thereon

A. Truing up of RVUN's Generating Station for FY 2021-22

Decommissioning of Suratgarh and Kota Thermal Power Station Units

Stakeholders/Respondents Comments/Suggestions

- 3.1 The Stakeholder submitted that RVPN vide Petition No. 2075/23 annexed MOM of 28th Energy Assessment Committee held on 07.01.2022 in which it has been decided that:
- a) Decommissioning of KTPS Units 1-4 will be made w.e.f December 2022 and if not done it shall attract penalty as imposed by MoEF beyond scheduled period as the penalty is not pass through to Discoms.
 - b) Decommissioning of STPS Units 1-5 will be made up to February 2024 to August 2028 in phased manner. However, on account of proposed penalty by MOEF on non-utilization of FGD equipments the units may not be available post December 2024 as the penalty is not pass through to Discoms.
- 3.2 RVUN have not annexed this document with the instant Petition and it is not understood to do so even when they are claiming tariff while the units are being decommissioned. Therefore, the Commission is required to direct RVUN for making transparency in their Petition. It is submitted that KTPS were decided for decommissioning since 30.06.2021 however, the Order of the State Government was revoked to be kept under hold for few days. These documents are also not being submitted by the Petitioner vide instant Petition.
- 3.3 In this regard, the Stakeholder sought the following:
- a) Detailed analysis report along with the techno-economical analysis to decide decommissioning of the units of KTPS and STPS rather than installation of FGD equipment's etc. for compliance of the pollution control notification of the MOEF within scheduled period.
 - b) Is the penalty being imposed as stated in the above said EAC meeting, if yes than amount be intimated or any new development have taken place for exemption/extension etc. RVUN to provide all related documents.
 - c) RVUN to provide techno-economical analysis for decommissioning of Units 1&2

of KTPS along with relevant Orders of State Government for decommissioning and decision to be kept under hold.

- d) Have RVUN explored possibility to reduce SHR of 110 MW KTPS Units 1&2. What is the actual SHR of the Units since FY 2018-19 to FY 2021-22?

RVUN's Response

- 3.4 RVUN submitted that GoR vide letter dated 28.12.2022 accorded approval for operation of KTPS Units 1-4 beyond 31.12.2022 till COD of new 2X660 MW SSCTPS Units 7&8 proposed against phasing out of old units or up to 31.12.2027 whichever is later. The said matter consideration is under with CEA and decision is expected shortly.
- 3.5 CE(TRPM), CEA vide letter dated 20.01.2023 has requested to all power utilities not to retire any thermal units till 2030 and ensure the availability of units after carrying out R&M activities as huge energy demand in coming summer 2023 and beyond. Accordingly, this office vide letter dated 03.02.2023 requested to CEA for time line extension for KTPS Units 1-4 up to 2030 and beyond with exemption in emission norms without levy of environmental compensation as these units are well performing and suitable for flexible operation to support renewable integration and rising power demand.
- 3.6 Further, RVUN submitted that the instant Petition is pertaining to true up of FY2021-22 and previous years true ups has been finalized by the Commission in its various Orders with prudence check.

Station Wise Allocation Statement Stakeholders/Respondents Comments/Suggestions

- 3.7 The Stakeholder submitted that the Commission vide its Order dated 23.06.2022 against Petition No. 1980/22 (Determination of ARR and Tariff for FY 2022-23 and True-up for FY 2020-21 had ruled as below:

"4.143 RVUN is directed to submit the Allocation Statement station wise in accordance with the RERC Tariff Regulations, 2019 duly certified by its Statutory Auditor, along with the audited accounts, in its true up petition for the subsequent years".

- 3.8 The Petitioner has not complied with the above direction of the Commission and therefore, necessary action under the provisions of Electricity Act, 2003 may be taken by the Commission against the Petitioner.

RVUN's Response

- 3.9 RVUN submitted that allocation statement as per the audited accounts duly signed by the Statutory Auditor along with the audited accounts are submitted with the instant Petition.

Capital Cost

Stakeholders/Respondents Comments/Suggestions

- 3.10 For CSCTPP (Units 5&6), the Commission vide its Order dated 28.12.2021 against Petition No. 1879/21 (Determination of Final Capital Cost and ARR and Tariff for FY 2018-19 to FY 2021-22) had approved total capital cost as on 31.03.2021 as Rs. 8568.05 Crore, whereas the Petitioner vide instant petition has considered Rs. 8569.63 Crore as opening GFA for FY 2021-22, which is not correct.
- 3.11 Vide Review Order dated 23.05.2022 against Petition No. 1990/2022 no additional capitalization has been allowed by the Commission. However, against the claim of 0.63 Crore (on account of variation of GST rates from 5.00% to 12.00% against purchase of locomotive) and against the claim of Rs. 0.948 Crore (on account of entry tax and spares of bulldozers procured for CSCTPP Units 5&6) the Petitioner was directed to submit their claim in true up petition with supporting documents vide aforesaid Review Order. The Stakeholder sought the supporting documents against it as it has not been submitted by the Petitioner vide instant Petition.

RVUN's Response

- 3.12 RVUN submitted that the Commission vide Order dated 02.12.2022 against Petition No. 2028/22 approved capital cost of Rs. 8569.63 Crore for CSCTPP Units 5&6.

Additional Capitalization

Stakeholders/Respondents Comments/Suggestions

- 3.13 For KTPS Units 1-7, the Petitioner claimed additional capitalization of Rs. 13.62 Crore towards renovation and modernization (up-gradation of Railway Track from Chambal Cabin to KSTPS, Saketpura Marshalling yard which was proposed to be carried out by W.C. Railways as deposit work) stating that it was approved by the Commission vide its Order dated 10.05.2012.
- 3.14 As per Annexure L (Detail of expenditure incurred in up gradation of railway track from Chambal Cabin to KSTPS) submitted vide instant Petition the Stakeholder submitted that the amount was deposited with Railways in the year 2011 and 2012 and the Petitioner had not submitted Work Completion certificate from Railways and therefore, the capitalization is not admissible. In the year 2012, urgency of the work was stated and expenditure is now being capitalized in FY 2021-22, i.e. after a period

of 10 years. This indicates that there was no urgency for the work. Further, for such long period amount deposited with the railways for the work has lost the interest of such huge amount. It appears that RVUN has not been active to get the work executed on time.

3.15 Further, the Petitioner vide Petition submitted that an amount of Rs. 235 Crore with IDC of Rs. 28.87 Crore for Renovation of CHP system Stage I and II was required at KTPS and in principle sanction was given by the Commission vide Order 10.05.2012. It was argued by RVUN at that time that:

"The existing system has already completed its useful life. The existing system is now running at a reduced capacity. The system has become obsolete and spare parts from the original equipment manufactures are not available. On account of running of trippers at reduced capacity and frequent outages, delay occurs in unloading of coal rakes. As a result of which on the one hand heavy demurrage is imposed by Railways and on other hand continuous coal feeding to the plant which is essential for generation with full efficiency is becoming difficult....."

3.16 In this regard, the Stakeholder sought the following:

- a) Work Order for the above was awarded to M/s Elecon EPC Project Ltd. vide Order dated 27.01.2015. Contract completion period has been 10 months in respect of wagon trippers no. 4 and for wagon trippers no. 2 it was 14 months. The Petitioner to submit as to when these works have been completed. In case of any delay, whether necessary penal charges have been recovered from the contractor. If so, what is that amount and where it has been accounted for. If not reasons for the same are required.
- b) Capitalization of this work is being sought after a period of about 7 years. Reasons for such delay with proper justification are to be submitted by the Petitioner.
- c) During the period of 7 years how the full efficiency in generation has been obtained in absence of such delay and how much amount of demurrages has been incurred during such delayed period of 7 years.
- d) Against sanctioned amount of Rs. 235 Crore with IDC of Rs. 28.87 Crore, capitalization of only Rs. 16.51 Crore has been sought. The Petitioner to provide justification for such short capitalization.
- e) In case the total work has been completed within Rs. 16.51 Crore, the Petitioner to state that no further amount is now required for this work.

- 3.17 Regarding additional capitalization of Rs. 1.86 Crore towards Railway Over Bridge (ROB) for KTPS (Units 1-6), the Commission had approved additional capitalization of Rs. 30.08 Crore in respect of ROB vide Order dated 22.04.2013. Vide Petition No. 1035/17, the Petitioner claimed Rs. 24.25 Crore only. Therefore, the Commission vide Order dated 20.06.2017 (Petition No. 1035/17) approved capitalization of Rs. 24.25 Crore.
- 3.18 For claiming the aforesaid additional capitalization, the Petitioner vide Petition No. 1035/17 had mentioned that "It had claimed the additional capitalization on the basis of Commission Order dated 10.05.2012 and the amount actually incurred and booked in accounts for FY 2015-16". Further, from aforesaid Order dated 20.06.2017, it is observed in respect of ROB that amount approved is Rs. 26.37 Crore (excluding IDC) and against this actual incurred has been claimed as Rs. 24.25 Crore. Therefore, question of any additional capitalization now does not arise. The Petitioner is also requested to state whether the said ROB has been completed and if so, when?
- 3.19 Regarding additional capitalization of Rs. 0.14 Crore in respect of induced draft counter flow RCC splash fill at KTPS Unit 6, it has been stated that it is a balance payment, but the Petitioner has not stated as to when this work was approved by the Commission and under which original scope of work it existed. The Petitioner to submit necessary justification in this regard.
- 3.20 For CTPP (Units 1-4), the Petitioner claimed additional capitalization of Rs. 0.31 Crore towards furniture's and fixture and Rs. 0.01 Crore towards office equipment's. The Commission in previous year tariff Orders has considering such expenditure towards part of O&M expenses and as such these capitalization are not admissible
- 3.21 For KaTPP (Units 1&2) the Petitioner claimed additional capitalization of Rs. 1.913 Crore, against hydraulic works, Rs. 0.305 Crore, against Plant and Machinery, Rs. 0.003 Crore, against furniture's and fixture and Rs. 0.0072 Crore against office equipments as per Regulation 17(2)(e) and Regulation 17 (5) (e) of the RERC Tariff Regulations, 2019. The Stakeholder submitted these additional capitalization amounts are not admissible as they do not meet the requirements of the said regulations.
- 3.22 For CSCTPP (Units 5&6), the Petitioner claimed additional capitalization of Rs. 110.11 Crore as per Regulation 17 (1) of the RERC Tariff Regulations, 2019. In this regard, the Stakeholder sought the following information:
- a) Details of work included in the original scope of work along with the estimates of expenditure.

- b) List of un-discharged liabilities and works deferred for executions giving reasons thereof.
- c) Petitioner shall submit the details of works asset wise/work wise included in the original scope of work along with estimates of expenditure liabilities recognized to be payable at a future date and works deferred for execution giving reasons thereof.
- d) Certificate of CA does not say anything about additional capitalization of Rs. 110.11 Crore. Petitioner to submit justification in this regard.
- e) Petitioner is required to provide as to how and in what way these works for which additional capitalization has been sought for were included in the original scope of work and for what reasons they could not be completed within the period.

3.23 In absence of above information, the Stakeholder submitted that no additional capitalization is admissible.

3.24 For RGTPP (270.50 MW), the Petitioner has sought additional capitalization of Rs. 20.86 Crore against Plant and Machinery as per Regulation 17 (5) (e) of the RERC Tariff Regulations, 2019. The Petitioner to state whether they have obtained any in principle approval for the aforesaid expenditure and if so, reference of the same be provided and if not such expenditure is not admissible.

RVUN's Response

3.25 For KTPS (Units 1-7), RVUN submitted that the work of Railway has been carried out as deposit work by Railway Department and RVUN deposited demand of Railway in FY 2010-11 and FY 2011-12. The work has been carried out in FY 2014-15 and RVUN requested for Fund Utilization and work completion certificates on 21.05.2018 as it was not provided by Railways.

3.26 RVUN continuously made vigorous efforts with Railways for utilization certificate from Railways and it was provided on 18.08.2020 and accordingly the amount was booked in Audited accounts in FY 2021-22.

3.27 Further, RVUN submitted that the penal charges imposed on M/s Elecon EPC Project Ltd against Renovation of CHP system Stage I and II are of Rs. 0.14 Crore, i.e., 1% of total contract value of Rs. 14.35 Crore.

3.28 Also, against Renovation of CHP system Stage I and II, RVUN submitted that the delay was on the following reason:

- a) Since, the work was to be carried out on the operational plant and it was essential to ensure timely unloading coal wagons within prescribed period. All wagon tippers were being utilized for unloading/ feeding of coal to boiler bunkers. Hence, permission to work was issued looking to the operational and maintenance requirement of machine.
- b) Also, pace of ETC work was hampered due to continuous operation of adjacent wagons tippers no. 1 and 3 as the hopper of wagon tippers 1&2 and 3&4 are common. Also, erection work was getting held up frequently during placement of loaded at in haul side and collection of emptied wagon at out haul side.
- c) The trusses of steel structure of shed of wagon tippers 2 were twisted during erection due to fast winds and it caused delay in ETC work of side arm charger.
- d) The demurrage amount for 7 years is as below:

Table 3: Demurrage amount

Particulars	Demurrage Charges (Rs. Crore)
FY 2016-17	3.33
FY 2017-18	0.29
FY 2018-19	0.16
FY 2019-20	1.39
FY 2020-21	0.11
FY 2021-22	1.30

3.29 Against the approval of Rs. 235 Crore balance works for renovation cum integration CHP package for coal handling and plant Stage - III of KTPS, amounting to Rs. 130.50 Crore is in progress.

3.30 The claimed amount of Rs. 16.51 Crore is the part of the work approved as Rs. 235.00 Crore. However, the balance work as mentioned above is in progress.

3.31 RVUN further submitted that the Commission issued in-principal approval of Rs. 26.37 Crore excluding IDC towards Railway Over Bridge (ROB) for KTPS (Units 1-6). RVUN has claimed Rs. 24.25 Crore during FY 2016-17. Now, RVUN has claimed Rs. 1.86 Crore balance left as per the demand. The work of ROB has been completed on 20.06.2013.

3.32 Further, Rs.0.14 Crore has been booked for the work of induced draft counter flow RCC splash fill nine twin cells cooling tower for KTPS Unit 6 as a balance payment during FY 2021-22.

3.33 Therefore, RVUN requested the Commission to allow additional capitalization for KTPS as claimed.

3.34 For CTPP (Units 1-4), RVUN submitted that the additional capitalization has been incurred as per Regulation 17(5)(e) of the RERC tariff Regulations, 2019. The above additional capitalization was inevitable for smooth functioning of plant and was not covered under original scope of work. Therefore, RVUN requested the Commission to allow Additional capitalization as claimed.

3.35 For KaTPP (Units 1&2), RVUN submitted that the additional capitalization have been incurred as per Regulation 17 (2) (e) and Regulation 17(5)(e) of the RERC tariff Regulations, 2019. The above additional capitalization was inevitable for smooth functioning of plant and was not covered under original scope of work. Therefore, RVUN requested the Commission to allow Additional capitalization as claimed.

3.36 For CSCTPP (Units 5&6) the cut-off date for the project is 30.04.2022 and additional capitalization has been claimed as per Regulation 17 (1) of the RERC Tariff Regulations, 2019. The claim of Rs. 110.11 Crore for FY 2021-22 is as per the audited accounts. Therefore, RVUN requested the Commission to allow the same

3.37 For RGTPP (270.50 MW), RVUN submitted that additional capitalization of Rs. 20.86 Crore, during FY 2021-22 under the head of the Plant machinery belongs to GT 1 of RGTPP as per Regulation 17(5)(e) of the RERC Tariff Regulations, 2019. Therefore, RVUN requested the Commission to allow Additional capitalization as claimed.

O&M Expenses
Stakeholders/Respondents Comments/Suggestions

3.38 The Stakeholder submitted the following:

Table 4: Difference between claimed and O&M expense as per Annexure C (Allocation Statement) of the Petition

Station	Claimed O&M expense (Rs. Crore)	O&M expense as per Annexure C (Allocation Statement) submitted vide instant Petition (Rs. Crore)	Savings (Rs. Crore)
KTPS (Units 1-7)	268.37	227.47	40.90
STPS (Units 1-6)	324.64	171.57	153.07
KaTPP (Units 1&2)	233.74	127.60	106.14
CSCTPP (Units 5&6)	257.12	148.82	108.30
RGTPP (270.50 MW)	47.72	37.44	10.28

3.39 As per above table, there is a difference between claimed O&M expense and O&M expense as per Annexure C (Allocation statement) submitted vide instant Petition,

which results in savings of Rs. 418.69 Crore in total. Since, the Petitioner is not depositing the full amount of terminal benefits as allowed in the Tariff Orders and as such this savings may be directed by the Commission to be deposited in the pension fund.

RVUN's Response

3.40 RVUN submitted that the actual O&M expenses include Repair & Maintenance, Employee Cost, Administrative expenses, water cost and cost of spares. When these all are considered the total actual O&M expense is as below:

Table 5: Actual O&M Expense claimed by RVUN

Station	Actual O&M expense (Rs. Crore)
KTPS (Units 1-7)	267.88
STPS (Units 1-6)	203.22
KaTPP (Units 1-2)	124.78
CSCTPP (Units 5&6)	179.61
RGTPS (270.5 MW)	39.86

3.41 Further, RVUN submitted that O&M expenses are allowed on normative basis. Therefore, RVUN requested the Commission to allow O&M expenses as claimed.

Depreciation

Stakeholders/Respondents Comments/Suggestions

3.42 The Stakeholder submitted that Depreciation may be allowed by the Commission only in respect of Gross Fixed Assets admitted. The Petitioner has not calculated the depreciation asset wise. The way in which depreciation has been calculated by the Petitioner in the instant Petition may result depreciation in respect of those assets which have already been depreciated to their limits.

3.43 Also, as per Regulation 22(4) of the RERC Tariff Regulations, 2019, the Petitioner has not computed depreciation by doing bifurcation of assets having completed 12 years of life from their date of COD and for remaining period, cumulative depreciation up to 12 years period and remaining for further period. The Petitioner may, therefore, provide revised calculations with respect to it. In absence of this information, the Stakeholder requested the Commission to not allow any depreciation and may deduct 10.00 % as per past practice.

3.44 Further, RGTPP GT-1 35.5 MW had achieved COD on 12.01.1996 and has completed its full life of 25 years as prescribed under Regulation 2 (a) (73) of the RERC Tariff Regulations, 2019. Therefore, no depreciation is to be allowed against it.