

Reply to Deficiency Note

General

- 1. The Petitioner is required to confirm whether the Petitioner has complied with the Clause 12.5 of the JSERC (Conduct of Business) Regulations, 2016.**

Reply: JBVNL humbly submits that Regulation 12.5 of JSERC Conduct of Business, 2017 lays down following rule for signing of Petition:

“The proceedings initiated before the Commission should be signed by the Managing Director or a Director of the Company. Any other person signing the petition should have authorization from the Board of Directors by a specific or general resolution;”

JBVNL has submitted the Petition in JSERC/Case (Tariff) no. 04 of 2020 regarding approval of True-up for FY 2019-20, Annual Performance Review (APR) for FY 2020-21 and Aggregate Revenue Requirement (ARR) and Business Plan for MYT Control Period (FY 21-22 to FY 25-26) with approval of Executive Director (C&R) who is a designated Director in BoD of JBVNL. Further BoD of JBVNL has also approved the Petition and Tariff Proposal through circulation and JBVNL has apprised Hon'ble Commission regarding the same through letter no. 414/CE(C&R) dated 01.04.2021.

True-up for FY 2019-20

- 1. It is observed that the Petitioner has submitted the provisional accounts for FY 2019-20. The Petitioner is required to submit the complete final audited accounts for FY 2019-20 along with auditor reports/comments/remarks for carrying out the true up.**

Reply: JBVNL would like to submit that due to various exigencies faced by it especially due to effect of COVID-19 induced lockdown, there was delay in getting accounts audited for FY 2019-20. In view of the same, JBVNL had requested Hon'ble JSERC to carry out provisional True-up for FY 2019-20 as has been practice in past years also in absence of audited balance sheet. However, JBVNL has completed the audit of its annual accounts by Statutory Auditor for FY 2019-20 and has attached the same at **Annexure-A**.

- 2. The Petitioner should submit the MS Excel ARR Model including revenue model with proper linkages and formulas.**

Reply: JBVNL has submitted MS Excel based working model of ARR to the Hon'ble Commission on 01.12.2020 to e-mail address info@jserc.org through JBVNL e-mail id cecr2018@gmail.com. Copy of the email is provided at **Annexure-B**.

- 3. The Petitioner is directed to submit the consumer category wise sales duly certified by the statutory auditor. Further, as communicated by the Petitioner, in its Petition, 100% metering is still in progress for rural consumers, hence, the Petitioner is required to demonstrate how they are measuring the sales to un-metered consumers/areas.**

Reply: Consumer category wise sales duly certified by auditor may be perused at Note-23 to annual accounts audited by Statutory Auditor for FY 2019-20 attached at **Annexure-C**.

Further JBVNL would like to submit that in absence of metered consumption, JBVNL has been Billing unmetered consumers as per assessment formula for calculation of the consumption given in Annexure 19 of JSERC (Electricity Supply Code) Regulations, 2015. In terms of revenue, JBVNL is charging tariff from unmetered consumers as per Clause 10.1 of JSERC Order dated 27th April'2018 regarding Tariff for FY 2017-18 and FY 2018-19.

- 4. The Petitioner is required to provide the basis for scheduling of power from each source on daily basis. Further, the Petitioner is required to demonstrate along with documentary evidence that Merit Order Dispatch (MOD) is followed while scheduling the power.**

Reply: JBVNL would like to submit that currently it has more power demand than the total capacity allocated to it from various CGS, IPPs, CPPs and JUUNL. In view of the same JBVNL schedules full power capacity from power plants which have been allocated to it. As an illustration, a letter dated 29th March 2021 requesting ERLDC for scheduling full allocated power on 30th March 2021 is attached at **Annexure-D**.

However, during course of the day, due to various climatic or social factors there may be drop in power demand of the state. In order to handle such scenario, there is a mechanism of 'Requisition' provided by respective Regional Load Dispatch Centre (RLDCs) where-in the participating utility may surrender power allotted to it at 7 blocks (consisting of 15 minutes) or more ahead of the real time. If, SLDC/JBVNL suffers a drop in the power demand leading to excess capacity w.r.t. allocated capacity, it surrenders this quantity of power through the Requisition mechanism. While surrendering the power through this mechanism, JBVNL factors in the **Merit Order Despatch** and surrenders such power starting from the plant with highest variable cost and thereafter in descending order of Energy Charge till scheduled power reaches a value equal to its anticipated demand. A list of variable charge of various power plants is attached at **Annexure-E**. Further, in the same annexure, JBVNL has attached actual time block-wise schedule of JBVNL on 30th March 2021 as a sample. Hon'ble Commission may peruse that in the 53rd and the 57th time-blocks of the day, JBVNL has surrendered power from NTPC Barh, NTPC Farakka I & II, NTPC Farakka III and NTPC MTPS placed at **Annexure-E1**. As per Merit Order list placed at **Annexure-E**, these power plants were having highest variable charges. Hence at the time of opting for 'Requisition' JBVNL considered these power plants for backing down before other power plants having lower variable charges.

Conversely, if in any time block, JBVNL has less allocation than its demand then also through the Requisition mechanism, it may avail or apply for additional power from same power plants (with which it has PPA) which have spare capacity at seven (07) or more time-blocks before real time through a mechanism known as 'URS'. While going for such requisition also, JBVNL follows Merit Order Dispatch Principle by opting for power plants having least variable cost out of all available option.

- 5. The Petitioner is required to provide the documentary evidence in support of power purchase quantum and expenses as claimed by the Petitioner (Table -2 of Petition). Further, the Petitioner is also required to bifurcate each component of power purchase cost and submit in the format (excel) attached as Annexure-1 along with actual payment made to generating plant.**

Reply: JBVNL submits that the documentary proof of power purchase cost is very voluminous and hence, it would be very difficult for JBVNL to submit the documents in hard copy. Accordingly, Hon'ble Commission is requested to either only seek power purchase invoice on sample basis or may verify the power purchase bills in JBVNL office only.

Bifurcation of Power Purchase Expense for FY 2019-20 in format (Annexure-I of Data gaps) has been attached at **Annexure-F** of instant reply.

- 6. It is observed that the Petitioner has claimed adjustment (credit) of Rs. 2.96 Crore in APRNL power purchase bill. The Petitioner is required to provide the detail for the same.**

Reply: JBVNL wheels power sourced from APNRL through short-term open access due to regulatory hurdle in obtaining long-term transmission charges. To wheel power through short-term open access, JBVNL provides its schedule to ERLDC as per APNRL availability, one month before the actual date of wheeling. However, due to variations in actual generation by APNRL in corresponding time blocks (with reference to schedule given to ERLDC), JBVNL has to pay differential amount to ERLDC as per Regulation (14) of Central Electricity Regulatory Commission (Open Access in inter-State Transmission) Regulations, 2008. Relevant extract of the Regulation is reproduced below:

“14. (1) The open access schedules accepted by the nodal agency in advance and on first-come-first-served basis may be cancelled or revised downwards by the applicant by giving a minimum five (5) days’ notice, excluding the day on which notice is served and the day from which revised schedules are to be implemented.

.....

(2) The applicant shall continue to be liable to pay transmission charges as per the schedule originally approved, if the period of revision or cancellation is up to five (5) days.

(3) Any person seeking downward revision of short term open access schedule (including revision to zero schedule) shall pay the operating charges specified under Regulation 17 of these regulations corresponding to the number of days for which power has been scheduled and in case of cancellation, operating charges shall be payable in addition for two (2) days or the period of cancellation in days whichever is less.”

As payment of extra amount to ERLDC due to revision/cancellation is not due to fault of JBVNL, hence JBVNL bills this amount further to APNRL as adjustment charges to prevent any pass through of this amount to its consumers.

In FY 2019-20, the net effect of this amount was Rs. 2.96 crore, which JBVNL has claimed as an adjustment from APNRL.

- 7. It is observed, in the case of Rungta Mines, the Petitioner has shown the units purchased as 20.45 MU and cost as (negative) Rs. -2.11 Crore. The Petitioner is required to submit the reason for negative power purchase cost.**

Reply: Rungta mines has a captive plant through which it generates power for its own use and at time of excess power is also supplied to JBVNL. Further in some-time blocks it also draws power from JBVNL as a consumer.

As per provisional account, JBVNL had adjusted total power purchased from Rungta mines with total power sales to the entity, which resulted in negative billing of Rs. 2.11 crore from Rungta Mines in FY 2019-20. However, post the comments of auditor, JBVNL has segregated power purchase and power sold from Rungta mines and has included the corresponding sales in Revenue from Sales. Accordingly, power purchase cost from Rungta mines has been arrived at Rs. 9.26 crore for net power purchase of Rs. 92.54 MUs where-as total power sales amounting to Rs. 11.37 crore has been included in Revenue from Sales.

- 8. The Petitioner is required to provide the documentary evidence towards its claim of Rs. 210.24 Crore against PGCIL bills. Further, the Petitioner is required to provide the details of Delay payment Surcharge and payment made for previous years, if any.**

Reply: Detail of PGCIL Bills for FY 2019-20 including DPS and previous year payment are attached at **Annexure-G**.

9. It is observed that the Petitioner has claimed the UI Payable (Rs. 66.84 Crore) at Rs. 6.02/kWh. The Petitioner is required to submit UI penalty paid against over drawal in FY 2019-20.

Reply: Details of day-wise deviation in scheduled and actual drawl and resultant deviation charge along with additional deviation charges have been attached at **Annexure-H** for perusal of Hon'ble Commission. Further, the JBVNL is submitting the revised True-up of FY 2019-20 in which it is claiming the UI Payable as Rs. 66.86 Crore at Rs. 6.03/kWh. The Hon'ble Commission is requested to consider the same.

10. It is observed that the Transmission losses of 5.17% for FY 2019-20 has been considered by the Petitioner against the approved Transmission Loss of 2.23% in the MYT Order dated February 24, 2018. The Petitioner should justify its claim of higher transmission losses along with documentary evidence that such losses are to the account of JUSNL.

Reply: Gross energy purchase for FY 2019-20 is 12,619.40 MUs and net input Energy received by JBVNL (as per substation reading) was 12,013.22 MUs. Hence, total transmission loss was 606.183 MUs in both Inter-State as well as Intra-State transmission system.

Inter-state transmission losses have been considered at 3% keeping in view prevailing POC losses for Jharkhand (withdrawal) and inter-state generators (injection) from which JBVNL takes power. In FY 2019-20, JBVNL purchased 7,137.06 MUs power from Inter-state generating stations (including UI and short-term power). Applying 3% losses on the same, inter-state transmission losses have been calculated at 214.11 MUs.

Thereafter, intra-state transmission losses has been calculated as difference of total transmission losses and inter-state transmission losses at 392.07 MUs. Total input to intra-state transmission losses have been determined at 8,210.19 MUs as calculated in below table:

Particulars	FY 2019-20	
	Approved	Actual
Power Purchase from Outside JSEB Boundary (A)	6,415.86	7,137.06
Loss in External System (%) (B)	3.00%	3.00%
Loss in External System (C = A * B)	192.48	214.11
Net Outside Power Available (D = A – C)	6,223.38	6,922.95
Energy Input Directly to State Transmission System (E)	411.34	465.71
State-owned Generation (F)	447.85	821.53
Energy Available for Onward Transmission (G = D+E+F)	7,082.57	8,210.19
Transmission Loss (H)	2.23%	4.78%
Transmission Loss (%) (I = H/G)	157.94	392.07

Accordingly, Intra State Transmission losses works out as 4.78% (392.07 MU/8,210.19 MU) for FY 2019-20.

Including UI sales of (-)88.20 MUs, total power purchase for FY 2019-20 comes out to be 12,619.40 MUs.

- 11. The Petitioner should submit the basis and detail (excel) calculation for considering intra-state transmission charges of Rs. 206.28 Crore for FY 2019-20 and also provide the details of actual payment made against the claimed amount.**

Reply: JUSNL charges JBVNL for energy wheeled through its network as per Tariff approved for JUSNL as per Hon'ble Commission's MYT Order dated 25th September 2018. In the MYT Order, Hon'ble Commission had determined tariff at Rs 0.25/kWh of power wheeled. As per above table, JUSNL had wheeled 8,210.19 MUs power in FY 2019-20. Applying approved tariff on wheeled energy, JUSNL billed Rs. 206.28 crore to JBVNL. Out of which JBVNL has paid Rs. 99 Crore against present and past period dues to JUSNL.

- 12. The Petitioner is required to provide justification for the increase in Employee expenses from the approved value of Rs. 288.87 Crore vis-a-vis the actuals of Rs. 306.71 Crore.**

Reply: JBVNL would like to submit that Hon'ble JSERC in its Order dated 01st October'2020 regarding APR for FY 2019-20 had considered inflation factor of 4.90% over actuals of FY 2018-19. Hon'ble Commission hadn't considered any other factor for projecting increase in Employee expense including addition in number of employees and impact of Pay revision in its Order.

However, due to pay revision as result of pay commission report and addition of employees, the overall increase in salary component was around 10% which resulted in additional increase of Rs. 18 Crore in employee expense in FY 2019-20.

Further, the Petitioner in its Petition dated 30th Nov. 2020 has claimed the Employee Expense as per provisional Balance sheet of FY 2019-20 where it was Rs. 306.71 Crore. However, as per annual accounts audited by Statutory Auditor for FY 2019-20 it is Rs. 219.26 Crore and JBVNL is claiming the same in the Revised True-up Petition for FY 2019-20. It is requested to the Hon'ble Commission to consider the value claimed in revised True-up Petition for FY 2019-20 as per audited balance sheet.

- 13. It is observed that the Petitioner has claimed normative debt-equity ratio of 70:30 to calculate Normative Equity and normative loan. The Petitioner is required to provide the details regarding source of Debt and Equity for the capital expenditure and capitalisation as claimed for FY 2019-20.**

Reply: JBVNL has claimed normative debt-equity ratio of 70:30 as per Regulation 6.16 (a) of JSERC MYT Distribution Regulations, 2015 for capitalization amount in FY 2019-20. However, in accordance with Regulation 6.26 of JSERC MYT Distribution Regulations 2015, JBVNL has excluded amount of capitalization financed from grant/consumer contribution while applying normative debt- equity ratio on capitalization amount in FY 2019-20. Scheme wise Debt, Equity and grant from which capex (all in Rs crore) was incurred in FY 2019-20 for various schemes is tabulated below:

Scheme	Debt		Equity Received	Grant	
	Amount Received (Rs Crore)	Source		Amount Received (Rs Crore)	Source
SCADA Part-A	16.84	PFC			
R-APDRP Part-A	-				
R-APDRP Part-B	-				
IPDS	-				
JSBAY (Urban)				-	
AGJY					
New DDUGJY	-			469.78	State Govt.
				305.88	Central Govt.
JSBAY (Rural)					
SAUBHAGYA				40.22	Central Govt.

14. The Petitioner is required to provide the detail of activities carried out under each capex plan as claimed for FY 2019-20. Further, the Petitioner is also required to provide comparison with approved scheme along with approved amount.

Reply: Detail of activities carried out under each capex plan as claimed in FY 2019-20 is tabulated below:

DDUGJY Scheme (12th Plan)

Infrastructure	Value
New LT line (Ckm)	878.22
New HT line (Ckm)	352.7
New 33 kV PSS (nos.)	4
New 33 kV line (Ckm)	150.77

Infrastructure	Value
New DTR (nos.)	1,546
New Connection (nos.)	12,029
R&M of PSS (nos.)	13

DDUGJY Scheme (New)

Infrastructure	Value
New LT line (Ckm)	18,326
New HT line (Ckm)	2,945.70
New 33 kV PSS (nos.)	24
New 33 kV line (Ckm)	760.24
New DTR (nos.)	23,514
New Connection (nos.)	86,812
R&M of PSS (nos.)	62

JSBAY (Rural)

Infrastructure	Value
New LT line (Ckm)	504
New HT line (Ckm)	555
New 33 kV line (Ckm)	665
New DTR (nos.)	680
Reconductoring 33 kV line (Ckm)	539
Reconductoring 11 kV line (Ckm)	1,070
New PSS (nos.)	5
R&M of PSS (nos.)	67

New Connection under **SAUBHAGYA**- 1,31,880

R-APDRP Part-B

Infrastructure	Value
New LT line (Ckm)	283.31
New HT line (Ckm)	67.64
New 33 kV PSS (nos.)	3
New 33 kV line (Ckm)	52.63
New DTR (nos.)	353
R&M of PSS (nos.)	15
Reconductoring 33 kV line (Ckm)	14.90
Reconductoring 11 kV line (Ckm)	46.01
R&M of DTR (nos.)	777
5 way RMU (nos.)	1
3 way RMU (nos.)	15
11 kV Sectionalizer (nos.)	15

SCADA Part-A

Infrastructure	Value
RTU (nos.)	86
FRTU (nos.)	1527

IPDS

Infrastructure	Value
New LT line (Ckm)	513
New HT line (Ckm)	190
New 33 kV PSS (nos.)	3

Infrastructure	Value
PSS Additional Transformer (nos.)	8
New 33 kV line (Ckm)	84
New DTR (nos.)	323
R&M of PSS (nos.)	1
Reconductoring 33 kV line (Ckm)	46
Reconductoring 11 kV line (Ckm)	62
Consumer Meter (nos.)	17,579
Solar Panel (kW _p)	269
Augmentation of DTR	34

JSBAY (Urban)

Infrastructure	Value
33 kV Cable (Ckm)	157.93
11 kV Cable (Ckm)	268.14
LT Cable (Ckm)	41.22

Comparison of actual amount incurred against various capex schemes and approved amounts has been submitted in Table 8 of Petition regarding True-up for FY 2019-20. The same has been reproduced as below:

Scheme Name	FY 2019-20	
	Approved (Rs. Cr.)	Actual (Rs. Cr.)
DDUGJY		1,485.63
IPDS		248.06
RAPDRP – A	15.50	54.40
RAPDRP – B		261.14
DDUGJY 12 th Plan		487.63

Scheme Name	FY 2019-20	
	Approved (Rs. Cr.)	Actual (Rs. Cr.)
ADP + Misc.	638.18	201.98
Tilka Manjhi & AGJY	45.59	20.86
RE State Plan		3.94
JSBAY	961.00	1,003.22
RGGVY (10 th & 11 th Plan)		-
SAUBHAGYA	90.00	75.21
Total	1,750.27	3842.08

- 15. The Petitioner is required to provide the documentary evidence of Grants and Consumer Contribution as submitted in the Petition. Further, the Petitioner is also required to provide the detail of actual amount received under grants and Consumer Contribution.**

Reply: JBVNL is in process of collating details and documentary evidence of Grants and Consumer Contribution received in FY 2019-20 from relevant departments. Further, it is submitted that considering the COVID-19 situation availability of personnels in JBVNL's offices is limited. Efforts are being made to provide the information as soon as possible.

- 16. The Petitioner should submit the detailed scheme-wise comparison of capitalization approved by the Commission vis-a-vis claimed for FY 2019-20. Further, in addition to above, the Petitioner is required to provide the project/scheme completion certificate certifying that the project/scheme is completed and in operation/put to use.**

Reply: Hon'ble Commission in its Previous Orders dated 01st Oct'2020 regarding APR for FY 2019-20 and 28th Feb'2019 regarding ARR for FY 2019-20 had not approved scheme-wise capitalization, hence JBVNL is unable to submit comparison of scheme-wise actual capitalization with approved capitalization. However, as submitted, on a total basis, JBVNL capitalized an amount of Rs. 3,131.94 Crore in FY 2019-20 as compared to the approved capitalization of Rs. 819.90 Crore for FY 2019-20 in Order dated 01st Oct'2020 regarding APR for FY 2019-20. The details of the same has been attached at **Annexure-I**.

Further, the completion certificate of few projects/schemes completed in FY 2019-20 and readily available with the licensee are attached as **Annexure-J** for the reference of the Hon'ble Commission.

- 17. The Petitioner should submit the details of the actual loan portfolio as on 1st April, 2019, for calculation of weighted average rate of interest as per Regulation 6.24 of the Tariff Regulations, 2015.**

Reply: Sheet detailing actual loan portfolio as on 01st April 2019 and interest rate applicable on individual loans for calculation of weighed average rate of Interest has been attached at **Annexure-K**.

18. It is observed that the Petitioner had claimed Interest on Consumer Security Deposit (CSD) as Rs. 54.04 Crore. The Petitioner is required to provide the details of actual interest disbursed to consumers against the claimed amount.

Reply: JBVNL submits that it has paid the dues pertaining to interest on consumer security deposit for FY 2019-20. Further, regarding actual amount of security amount disbursed to the consumers it is submitted that considering the COVID-19 situation availability of personnel's in JBVNL offices is limited. Efforts are being made to provide the information as soon as possible.

Further, it is requested to the Hon'ble Commission to consider the revised submission for True-up of FY 2019-20 as per annual accounts audited by Statutory Auditor. The JBVNL is claiming the Consumer Security Deposit as Rs. 58.25 Crore as per annual accounts audited by Statutory Auditor for FY 2019-20.

19. The Petitioner in its petition has proposed to adjust the difference between the Commission's approved collection efficiency (100%) and actual collection efficiency (86.70%) against RGF as per letter dated July 14, 2014 of Energy Department, Government of Jharkhand. The Petitioner is required to provide the letter as mentioned above.

Reply: The Licensee humbly submits that the RGF Letter no. 490 dated 14.7.2014 by Energy Department, GoJ for reference of the Hon'ble Commission is attached at **Annexure-L**.

20. It is observed that the Petitioner had requested to relax target for T&D loss from 14% to 18% for calculation of disallowance. The Petitioner is required to provide the reason for deviation from the approved target.

Reply: JBVNL has added a large number of rural consumers in its network. As of date it is supplying power to approximately 42 lakh domestic consumers as compared to 32 lakh consumers at the beginning of the Control Period. Most of the addition in domestic consumers have been in rural areas. JBVNL currently has 32 lakh domestic consumers are in rural areas. JBVNL has to lay extensive network to supply electricity in rural areas as they are very sparsely populated. Resultantly, the technical loss in network also increased due to wheeling through long distribution lines. Furthermore, it is also very difficult to track commercial losses due to theft and unmetered supply in rural areas due to their expansive area as well as socio economical background of population. Due to these reasons, JBVNL, despite its best effort as also submitted in Petition, was not able to bring down the T&D losses to 14% and requests Hon'ble Commission to approve the T&D losses at 18%.

21. It is observed that as per the Petitioner's audited account for FY 2019-20, the State Government has granted Rs. 600 Crore under the head of Grants-in-aid for debt services. The Petitioner is directed to detail for which purpose/scheme the same has been disbursed.

Reply: Grant-in-aid of Rs. 600 crore received from state Government in FY 2019-20 was used for payment of dues of power purchase liabilities of JBVNL.

APR for FY 2020-21

22. It is observed that the Petitioner has projected the Transmission and Scheduling Charges by escalating the actual transmission and scheduling charges for FY 2019-20 by 5%. The Petitioner is required to provide the basis for such escalation and actual transmission and scheduling charges for the FY 2020-21 (till Dec'20).

Reply: JBVNL would like to submit that in FY 2019-20 its total transmission and scheduling charges of PGCIL stood at Rs. 210.23 crore which was 50% higher than corresponding value

for FY 2018-19 which was at Rs. 140.34 crore. However, JBVNL has considered only a conservative CAGR of 5% to estimate transmission and scheduling charges for FY 2020-21 in line with other elements of power procurement cost. JBVNL further submits that the actual value of transmission and scheduling charges would any way be trued-up as per annual accounts audited by Statutory Auditor for FY 2020-21 and hence, for the purpose of APR for FY 2020-21, escalation rate of 5% may be considered by Hon'ble Commission.

23. The Petitioner has projected the Power Purchase cost from new NTPC plants at Rs. 4.00 kWh (Energy Charge- Rs 1.75/kWh and Capacity Charge-Rs 2.25/kWh). The Petitioner is required to provide the basis for such assumption.

Reply: In FY 2020-21 and FY 2019-20 JBVNL has started drawing power from NTPC Nabinagar and NTPC Darilpalli respectively. Average power purchase cost of Nabinagar Plant was Rs. 4.43/kWh while power purchase cost of Darilpalli is at Rs. 3.43/kWh. Considering power purchase cost of these coal-based plants, power purchase cost of other upcoming new plants has been considered at Rs. 4.0/kWh.

JBVNL would further like to submit that initially full debt taken by a power plant for its construction is standing and further there is no depreciation on its standing GFA. Resultantly, two main elements of Fixed Cost – Interest on Loan and Depreciation are higher and hence JBVNL has considered fixed cost at Rs 2.25/kWh. Variable Cost of the plant is also considered as Rs, 1.75/kwh on the basis of average per unit variable cost coming for the above two plants.

24. The Petitioner is required to provide the basis for claim of UI Payable, UI Receivable, PTC (IEX) Purchase, PTC (IEX) Sale and Supplementary Bill/REA for FY 2020-21.

Reply: JBVNL does not deviate from its schedule deliberately. At all times it is endeavour of JBVNL that its schedule is same as its drawl and hence, there should be no UI Purchase/UI sales ideally. Even if the deviation occurs there is equal probability of happening it on either side of scheduled quantity. Hence, JBVNL has considered that UI purchase and sales would even themselves out in H2 of FY 2020-21.

Similarly, JBVNL has adequate capacity contracted from power plants and need not procure short-term power in natural course of business. However, often due to sudden tripping of generating units and revision of injection schedule of RE generators (as near as 7th and 3rd time block), JBVNL faces shortage of power and it is forced to purchase power from power exchange. Similarly, if JBVNL envisages that it has excess capacity available in any time block as compared to its demand and it can sell the power profitably after considering Energy Charge of the plant or to maintain DSM, it bids the power for sale in power exchange. Both the activities are randomised and it is not possible to predict the quantum of energy purchased/sold from Power Exchange in advance. Hence, JBVNL has considered that Short Term Power Purchase and Sales would even themselves out in H2 of FY 2020-21.

Accordingly, JBVNL has considered only H1 values of UI Purchase, UI Sales and Short-Term power purchase and Sold in terms of quantum and Revenue and hasn't considered these parameters in H2 FY 2020-21 as it is expecting equal amount of purchase/through these routes and hence no resultant impact.

25. It is observed that the Petitioner has claimed Transmission losses as 5.00% for FY 2020-21 against the approved value of 2.23% in the MYT Order dated February 24, 2018. The Petitioner is required to provide the basis for same.

Reply: JBVNL has considered value of Intra-State Transmission Losses at 5.0% keeping in view actual intra-state transmission loss of 4.78% in FY 2019-20.

26. It is observed that the Petitioner has claimed normative debt-equity ratio of 70:30 to calculate Normative Equity and normative loan. The Petitioner is required to provide the detail regarding source of funding for the capital expenditure and capitalisation as claimed for FY 2020-21.

Reply: Scheme wise Debt, Equity and grant from which capex (all in Rs crore) was incurred in FY 2020-21 (Till Dec, 2020) for various schemes is tabulated below:

Scheme	Debt		Equity Received	Grant Received	Source
	Amount Received (Rs Crore)	Source			
SCADA Part-A					
R-APDRP Part-A					
R-APDRP Part-B					
IPDS	100*	PFC		74.55	Central Govt.
JSBAY (Urban)				158.89	State Govt.
AGJY					
DDUGJY 12 th Plan	6.4	REC		67.4	Central Govt.
New DDUGJY	25.23	REC		139.03	Central Govt.
JSBAY (Rural)				425.70	State Govt.
SAUBHAGYA		PFC		26.27	
ADP (ERP & GIS Projects)				10.50*	State Govt.

* Indicated for the complete year i.e. FY 2020-21.

27. It is observed that there is deviation in the capital expenditure and capitalisation plan as proposed by the Petitioner vis-à-vis approved by the Commission for FY 2020-21. The Petitioner is required to provide the proper reasoning for the same and scheme wise source of funding. In addition to above, the Petitioner is also required to provide

the detail of physical progress of work till Dec'20 along with project completion certificate in support of the same.

Reply: JBVNL would like to present that Hon'ble JSERC in its Tariff Order dated 01st Oct'2020 had approved capex of Rs. 1,750 crore in comparison to Rs. 6,145.94 crore as submitted by JBVNL. Hon'ble JSERC had only allowed capex under JSBAY-RE, R-APDRP Part A, ADP and Tilka Manjhi schemes. However, Hon'ble Commission did not approve any capex under DDUGJY, DDUGJY 12th Plan, IPDS, SAUBHAGYA and World Bank-IT schemes, although these schemes have been previously approved by Hon'ble JSERC. Hon'ble JSERC in its Order stated that it intends to limit expenditure under the schemes discussed above for FY 2019-20 to the Capex approved in MYT Order.

However, Hon'ble Commission in subsequent Orders (after MYT Order) itself had approved new schemes such as SAUBHAGYA, World Bank-IT schemes under JPSIP and had also approved additional capex under IPDS and DDUGJY (under saturation) mode.

Hon'ble Commission Order for APR for FY 2020-21 came on 01st Oct'2020 when already half of the FY had passed and also work order for various works under the schemes in current FY were also issued and couldn't be rolled back. Resultantly, the estimated capex and capitalization in FY 2020-21 are different as compared to the approved value for the schemes which were not approved by Hon'ble JSERC.

Physical progress of Work under various schemes till Dec'20 are mentioned below:

DDUGJY Scheme (New)

Infrastructure	Value
New LT line (Ckm)	5,328.62
New HT line (Ckm)	1,517.38
New 33 kV PSS (nos.)	15
New 33 kV line (Ckm)	190.26
New DTR (nos.)	5,067
New Connection (nos.)	24,533
R&M of PSS (nos.)	17

JSBAY (Rural)

Infrastructure	Value
New LT line (Ckm)	935.71
New HT line (Ckm)	609.55
New 33 kV PSS (nos.)	11

Infrastructure	Value
New 33 kV line (Ckm)	371.56
New DTR (nos.)	1,095.00
New Connection (nos.)	-
Reconductoring 33 kV line (Ckm)	484.16
Reconductoring 11 kV line (Ckm)	1,436.01

New Connection under **SAUBHAGYA**- 42,691

R-APDRP Part-B

Infrastructure	Value
New LT line (Ckm)	0.29
New 33 kV PSS (nos.)	1
New 33 kV line (Ckm)	-
New DTR (nos.)	1
11 kV Sectionalizer (nos.)	

IPDS

Infrastructure	Value
New LT line (Ckm)	344.32
New HT line (Ckm)	114.29
New 33 kV PSS (nos.)	2
PSS Additional Transformer (nos.)	4
New 33 kV line (Ckm)	24.53
New DTR (nos.)	248
R&M of PSS (nos.)	1
Reconductoring 33 kV line (Ckm)	7.32

Infrastructure	Value
Reconductoring 11 kV line (Ckm)	31.97
Consumer Meter (nos.)	5,707
Solar Panel (kW _p)	82
Capacitor Bank (MVA _r)	4.8

JSBAY (Urban)

Infrastructure	Value
33 kV Cable (Ckm)	137.54
11 kV Cable (Ckm)	145.40
LT Cable (Ckm)	0.78

Note: ERP & GIS projects comes under ADP head for which physical progress can't be quantified because it comes under services category.

28. The Petitioner is required to provide the basis for claim of Rs. 2443.46 Crore towards Consumer Contribution & Grants (CCG) against the approved value of Rs. 4315.58 Crore by the Commission.

Reply: Scheme-wise Grant component (%), projected capex and resultant grant amount (Rs. Crore) in FY 2020-21 is tabulated here under:

Scheme	Grant Component (%)	Capex Amount (Rs Cr.)	Grant Amount (Rs. Cr.)
DDUGJY	60%	1,322.50	793.50
IPDS	60%	180.00	108.00
RAPDRP - A	100%	20.00	20.00
RAPDRP – B	0%	548.32	-
DDUGJY 12th Plan	90%	54.00	48.60
ADP + Misc.	100%	473.00	473.00
Tilka Manjhi & AGJY	100%	49.34	49.34
RE State Plan	100%	35.21	35.21

Scheme	Grant Component (%)	Capex Amount (Rs Cr.)	Grant Amount (Rs. Cr.)
JSBAY – RE	100%	491.81	491.81
RGGVY (11th Plan)	90%	29.55	26.60
SAUBHAGAYA	100%	87.56	87.56
JPSIP Scheme (IT)	64%	245.20	157.91
Total		3,536.49	2,291.52

Additionally, JBVNL has considered consumer contribution at 2.55% of assets capitalised in line with actual ratio in provisional accounts of FY 2019-20. The resultant consumer contribution estimated for FY 2019-20 has been calculated at Rs 151.93 crore. Accordingly, JBVNL has considered Consumer contribution and grant amount at Rs. 2,443.46 crore. Hon'ble Commission hasn't elaborated how it has arrived at value of consumer contribution and grants at Rs. 4,315.38 crore for FY 2020-21 and hence JBVNL couldn't comment on the matter.

Further, the completion certificate of few projects/schemes completed in FY 2020-21 and readily available with the licensee are attached as **Annexure-J** for the reference of the Hon'ble Commission.

29. The Petitioner requested to revise the target of T&D loss as 18% against 13% approved by the Commission for FY 2020-21. The Petitioner is required to provide under which clause of MYT Regulation, the Petitioner had made such relaxation in claim of T&D loss.

Reply: As submitted it reply at S.No 20 above, JBVNL has added a large number of rural consumers in its network. As of date it is supplying power to approximately 42 lakh domestic consumers as compared to 32 lakh consumers at the beginning of Control Period. Most of the addition in domestic consumers have been in rural areas. JBVNL currently has 32 lakh domestic consumers are in rural areas. JBVNL has to lay extensive network to supply electricity in rural areas as they are very sparsely populated. Resultantly, the technical loss in network also increases due to wheeling through long distribution lines. Furthermore, it is also very difficult to track commercial losses due to theft and unmetered supply in rural areas due to their expansive area as well as socio economical background of population. These reasons have lead to increase in losses as compared to approved value

As per Regulation 5.31 of JSERC MYT Distribution Regulations, 2015 any variation on account of uncontrollable elements shall be treated as a pass through to be ultimately charged to the consumers, subject to validation and approval by the Commission. The increase in distribution loss from 13% to 18% has been projected on account of variation in sales which has been classified as a uncontrollable factor as per S.No 1 of Table given in Regulation 5.30 of JSERC MYT Distribution Regulations, 2015.

Business Plan

30. As per Clause 6.7 of MYT Distribution Regulations, 2020, the Petitioner is required to provide the purpose of investment, DPR & Load Flow Analysis, Capital Structure, Capitalization Schedule, Implementation schedule including timelines, Cost-benefit analysis and Rate reasonability, etc. The Petitioner is required to comply the MYT regulations and provide the above said detail.

Reply: JBVNL has submitted abstract of DPR (wherever applicable), capital structure, capitalization schedule and cost benefit analysis of various schemes in Chapter-4 of the Business Plan. However, load flow analysis for any scheme has not been prepared as there was no specification as such either from project funding entity or Hon'ble Commission.

- 31. The Petitioner in its Petition has submitted that in order to cater to the load growth and addition of new consumers in the system, the State has kept aside budget apart from centrally sponsored scheme in the form of Annual Development Plan (ADP) budget. In FY 2020-21, a budget of Rs. 290 Crore has been sanctioned, but the amount hasn't been received. The funding of ADP is provided by State Government in form of loan bearing interest rate of 13% per annum. The Petitioner further added that such loans from State Government have never been serviced by JBVNL and are most likely to be converted to grant at a future date. The Petitioner is directed to clearly specify such type of funding from State Government for the projected capex for the Control period from FY 2021-22 to FY 2025-26.**

Reply: JBVNL would like to submit that it would be getting grant from state government for schemes such as JSBAY and Annual Development Plan in form of grant only and not in form of loan which would be later-on converted into loan.

- 32. It is observed that the Petitioner has not provided the detailed basis and reasoning for projection of number of consumers, Connected Load and Sales for the MYT period from FY 2021-22 to FY 2025-26. Therefore, the Petitioner is required to provide the detailed basis along with reasoning for projection in workable excel format with proper linkage.**

Reply: JBVNL would like to submit that it has submitted detailed basis and reasoning for projecting category wise number of consumers, connected load and Energy Sales from FY 21-22 to FY 25-26 in the sixth chapter of the Business Plan. The relevant portion of the Business Plan has been attached at **Annexure-M**.

Further the excel calculation for the same has been attached at **Annexure-N** for the reference of the Hon'ble Commission.

- 33. The Petitioner is required to provide the following details of Power Purchase Agreements (PPA) entered with Generating Plants in the format enclosed as Annexure-2.**

Detail of PPA entered with Generating Plant in Annexure-2 of Data gap has been attached at **Annexure-O** of instant reply

- 34. The Petitioner has submitted that for making projection for power purchase quantum and per unit cost from each generating source for the Control period from FY 2021-22 to FY 2025-26, the provisional values of FY 2020-21 has been considered, with certain adjustments based on the relevant information about availability of source of generation and escalation. The Petitioner is directed to provide the source wise detailed basis of assumption and adjustments made while projecting the power purchase quantum and per unit cost from each source for the Control Period.**

Reply: As submitted in Business Plan, JBVNL has considered power purchase quantum from existing sources same as the quantum estimated for FY 2020-21. However due to changing scenario including upcoming power plants it has made some adjustments. Assumptions and adjustments made while projecting the power purchase quantum and cost for next Control Period are enumerated below:

- Due to excess contracted capacity at time of off-peak loads, existing power plants with high variable cost (including NTPC Kahalgaon, NTPC Farakka, NTPC Farakka_III, NTPC

Barh Stage I & II, NTPC Nabinagar, Inland Power Limited and APNRL) would be backed down as per Merit Order Despatch Principle. Moreover, with coming of cheaper and must-run solar and wind power PPAs also, power from costlier power plants is expected to be backed down leading to overall reduction in power purchase cost.

Financial Year	2021-22	2022-23	2023-24	2024-25	2025-26
Factor for reducing power from Plants with Higher Variable Cost	70%	60%	60%	50%	50%

- Due to migration of HT consumers from DVC command area and integration of national grid in Dhanbad and Giridih districts of DVC command area, it is expected that power procurement from KTPS would reduce year on year in following manner.

Reduction in Power purchase from KTPS in next Control Period

Financial Year	2021-22	2022-23	2023-24	2024-25	2025-26
Factor for reducing power from KTPS	80%	65%	50%	35%	20%

- In order to optimize power purchase cost in view of power allocation of 2,605 MW from upcoming conventional power plants; JBVNL is trying to de-allocate power from various existing power plants including following:

Power Plants to be considered for De-allocation in next Control Period

Power Plant	Allocated Capacity (MW)
NTPC Farakka -I	139.06
NTPC Kahalgaon I	27.66
NTPC Barh Stage-I & II	40 + 202 (67*3)
NTPC Nabi nagar	60 (20 *3)
NTPC KBUNL	11.5
Rungta Mines	4
ABCIL	11
Total	495

Out of Power plant mentioned above, NTPC Farakka-I and NTPC Kahalgaon has already achieved retirement age and hence may be de-commissioned in next Control Period. JBVNL has already started correspondence with Ministry of Power, Government of India to this effect. It is expected that power from these plants would be de-allocated from FY 2023-24 onwards

- **Deallocation of NTPC Korba and Farakka III Plants:** JBVNL was allocated capacity from NTPC Korba and Farakka III plants in lieu of loss of allocation of Patratu Thermal Power Stations. However, after commissioning of PUVNL allocation from these plants would be de-allocated. It is expected that from FY 2023-24; 100 MW from these two plants (50 MW each) would be de-allocated.
- **Power Requirement in next Control Period:** Based on estimated Sales and Energy balance for next Control Period, excess power available for sale in open market has been calculated.
- **Banking of Power:** Banking of Power has not been considered as amount of power availed and supplied through banking mechanism are roughly the same for full year.
- **Purchase through short-term sources:** No power purchase from IEX (PTC) or UI mechanism has been projected as power supply quantum in FY 2020-21 is greater than power requirement. However due to emergency situation, like outage of a generation plant, JBVNL may be forced to purchase power from exchange.
- Power Purchase rate of various generation sources have been escalated 5% annually except renewable sources which have been contracted at levelized tariff.

35. It is observed that the Petitioner has not provided the estimated manpower requirement for the next Control Period. Further, the Petitioner has also not provided the details of existing arrangement/manpower including Contractual employees in the Petition. The Petitioner is required to provide the details of existing manpower including Contractual employees along with projection for each year of the Control period.

Reply: The details regarding the existing executive manpower list as on 29.06.2021 along with recruitment plan till FY 2022-23 is attached as **Annexure-P** for the reference of the Hon'ble Commission.

36. The Petitioner is directed to provide the detailed break up of actual Employee Expenses, R&M Expenses & A&G Expenses along with break-up of the Legal/Litigation Expenses for the previous Years (FY 2015-16 to FY 2019-20) duly certified by the Statutory Auditor of the Company as required under Regulation 6.11 of the JSERC MYT Regulations, 2020.

Reply: Please refer to notes to annual accounts audited by Statutory Auditor of respective years (attached at Annexure-Q) as below:

Year	Note No.
2015-16	Note 25-Employee Benefit Expenses Note 27- Administrative Expenses Note 28: Repairs & Maintenance
2016-17, 2017-18 & 2018-19	Note 26-Employee Benefit Expenses Note 28- Other Expenses-Administrative Expenses Note 28: Other Expenses - Repairs & Maintenance
2019-20	Note 27-Employee Benefit Expenses Note 29- Other Expenses-Administrative Expenses

Year	Note No.
	Note 29: Other Expenses - Repairs & Maintenance

37. The Petitioner has projected the transmission loss and distribution loss at 5% and 15% for each year of the Control period against the approved Transmission Loss of 2.23% in the MYT Order dated February 24, 2018 and distribution loss of 13% for FY 2020-21. The Petitioner is required to provide the justification for projecting higher losses than earlier approved values.

Reply: As submitted above in reply at Serial no. 20 and 29, JBVNL has added a large number of rural consumers in its network. As of date it is supplying power to approximately 42 lakh domestic consumers as compared to 32 lakh consumers at the beginning of Control Period. Most of the addition in domestic consumers have been in rural areas. JBVNL currently has 32 lakh domestic consumers are in rural areas. JBVNL has to lay extensive network to supply electricity in rural areas as they are very sparsely populated. Resultantly, the technical loss in network also increases due to wheeling through long distribution lines. Furthermore, it is also very difficult to track commercial losses due to theft and unmetered supply in rural areas due to their expansive area as well as socio economical background of population. These reasons have lead to increase in losses as compared to approved value for previous Control Period.

Hence JBVNL requests Hon'ble JSERC to approve normative distribution loss at 15% for next control period. However, JBVNL would endeavour its best effort to further reduce distribution losses and would also share gains made from reduction in distribution losses with consumers.

JBVNL has also projected Intra-State transmission losses at 5% for next Control Period, in accordance with actual intra-state transmission losses of 4.78% in FY 2019-20

MYT Petition for Control Period from FY 2021-22 to FY 2025-26

38. The Petitioner is required to provide the component-wise details of Non-Tariff Income (NTI) on actual basis for the period from FY 2015-16 to FY 2019-20.

Reply: Please refer to notes to annual accounts audited by Statutory Auditor of respective years (attached at Annexure-Q) as below:

Year	Note No.
2015-16	Note 22B-Revenue Grant from Govt. Note 23- Other income
2016-17, 2017-18 & 2018-19	Note 24A-Revenue Grant from Govt. Note 24B- Other income
2019-20	Note 24-Revenue Grant from Govt. Note 25- Other income

39. The Petitioner submitted that they have not considered any effect of RGF for FY 2020-21 as per letter no. 4040 dated 20.10.2017 by Energy Department, Govt. of Jharkhand. The Petitioner is required to furnish the letter.

Reply: The Licensee humbly submits that the RGF Letter no. 4020 dated 20.10.2017 by Energy Department, GoJ for reference of the Hon'ble Commission is attached at **Annexure-R**.

- 40. The Petitioner submitted that in compliance to Commission's Order dated September 21, 2020 (Case no. (Suo-Moto): 15 of 2020) regarding relief to the consumers due to lock-down imposed by the Government to contain the spike COVID-19, the Petitioner has incurred loss of Rs. 86.85 Crore and requested to pass the same in the ARR for FY 2021-22. The Petitioner is directed to provide the detail along with audited certificate certifying the above submitted impact along with necessary computations.**

Reply: The licensee wishes to submit humbly that the detailed impact of relief provided by JSERC on Case no. 15 of 2020 regarding waiver of fixed charge and DPS is already submitted in the MYT Petition in paragraph 5.13 at page no. 71.

- 41. The Petitioner should submit the calculation of voltage-wise wheeling charges, Cross-Subsidy Surcharge and Additional Surcharge for FY 2021-22 in MS Excel format along with assumptions and detailed approach and methodology.**

Reply: Calculation of Voltage-wise wheeling charges, cross subsidy charge and additional charge for FY 2021-22 along with assumptions and detailed A&M has been attached at **Annexure-S**.

- 42. The Petitioner is required to provide the following year wise details of each consumer category (as approved by the Commission in its latest Tariff Order of JBVNL) for FY 2015-16 to FY 2019-20 duly certified by the Statutory Auditor.**

Sl. No.	Consumer Category	Contracted Load (kW/kVA)	Sales (MU)
1	DS-Rural (upto 5 kW)		
2	DS-Urban (upto 5 kW)		
3	DS-Rural (greater than 5 kW)		
4	DS-Urban (greater than 5 kW)		
5	DS-HT		
6	Irrigation & Agriculture Service		
7	CS-Rural (greater than 5 kW)		
8	CS-Urban (greater than 5 kW)		
9	LTIS (greater than 5 kW)		
10	HTS		
11	Street Light		
12	HT Institutional Services-RTS		

Sl. No.	Consumer Category	Contracted Load (kW/kVA)	Sales (MU)
13	HT Institutional Services-MES		
14	HT Institutional Services- Other Distribution Licensees		

Reply: JBVNL would like to submit that statutory auditors are appointed to audit the accounts and perform their statutory audit as per the Company Act. The information sought by Hon'ble Commission is for a past period when there was a different auditor than the present statutory auditor. Hence, certifying such data is neither in scope of work of present statutory auditor and the data also corresponds to a past period. Hence, JBVNL finds itself unable to submit the information as sought by Hon'ble Commission.

43. It is observed that the Petitioner submission and compliance is not found satisfactory for the following directions of the Commission issued in its earlier Orders:

- a. Abolishment of unmetered category
- b. RPO Obligation
- c. Quality of power/ Reliability Indices and Standard of Performance (SOP)
- d. Strengthening of Distribution Network
- e. Energy Audit & T&D Loss Reduction Plan
- f. Interest on Consumer Security Deposit
- g. Wheeling Charges
- h. Employee Performance Appraisal
- i. Monitoring of Compliance to Directives
- j. Quarterly forecast of the Quantum of Short Term Power to be purchased
- k. Computation of SAIDI
- l. Safety Regulations Compliance
- m. The Petitioner should submit compliances to the above directions.

Reply: JBVNL is putting forward its best endeavour to submit compliance of various directives issued by Hon'ble JSERC. JBVNL requests Hon'ble JSERC to provide time till 30th November 2021 when JBVNL would submit compliance of directive along with next Petition.

44. The Petitioner should submit the details of consumer category wise revenue for FY 2019-20 along with proper formulae and linkages detailing the ABR for each category of consumers.

Reply: JBVNL would like to submit that it annually prepares Revenue Statement-1 which summarises the category-wise and component-wise revenue billed and collected from consumers. The same is further used for purpose of annual accounts after due- reconciliation. JBVNL is submitting the Revenue Statement-1 (FY 2019-20) same as **Annexure-T**.

Further the actual amount billed to various categories in a particular year can't be arrived by using formulae (tariff and units consumed) as there is significant overlap of previous and current billing period between past and future financial year and adjustment due to factors like

locked premise etc. Hence the amount reflecting in Revenue Statement-1 is to be considered for the same.

- 45. The Petitioner has proposed implementation of unmetered tariffs, claiming that JBVNL may be constraint to bill some of the consumers without meter for reasons beyond its control. The Petitioner should provide reason for proposing unmetered tariff and what are the constraints faced by it in billing its consumers.**

Reply: JBVNL would like to submit that it has done its best endeavour to ensure achievement of 100% metering target and has appointed multiple agencies to install meters at consumers' premises. However, despite the best efforts, there are nearly 5.86 lakhs un-metered consumers, which has been the biggest challenge majorly on account of the following factors:

a. Large number of un-metered Consumers in Far-Flung Areas: It is important to appreciate the geographic challenges of Jharkhand, with large no. of rural consumers sparsely located in far-flung areas. It has been really challenging to reach to such consumers and convince them to convert into metered consumer.

b. Resistance from consumers: The metering agencies have reported multiple cases where consumers have demonstrated strong resistance against installation of meters. Such cases have been particularly high in the rural areas, where the consumers have been habitual of paying fixed electricity dues.

It is important to mention that although JBVNL aspires to ensure 100% metering of consumer with no further delay, but the real on ground challenges cannot be ignored. JBVNL is trying to meter/ replace faulty meter of remaining consumers under rate contract. The tenders have already been opened to purchase the meters and it is expected to complete the target by December 2021. Hence in view of same, JBVNL has requested Hon'ble Commission to allow un-metered tariff for such consumers, even as JBVNL endeavours to meter 100% of its consumer.

- 46. The Petitioner is required to provide the detail tariff proposal for FY 2021-22 along with basis for consideration. The Petitioner is also required to provide the excel calculation for the same along with proper linkage. Further, the Petitioner is required to provide the category wise cross subsidy at existing tariff and proposed tariff.**

Reply: JBVNL has submitted Tariff Proposal for FY 2021-22 after getting due approval of its BoD vide Agenda no. 09/20-21 dated 23.02.2021. The same has been re-submitted at **Annexure-U** to the reply. Further, the calculation for the same has been sent to e-mail address info@jserc.org through JBVNL e-mail id cecr2018@gmail.com on 25.02.2021.