



JHARKHAND URJA SANCHARAN NIGAM LTD.

(CIN No. - U40108JH2013SGC001704)

Regd. Office- JUSNL Building, Kusai Colony, Doranda, Ranchi -834002

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Letter No.....19..... /JUSNL
File No- GM/C&RA/354/2020-21(Part File)

Dated.19.../02.../2024

From,

Ashish Kumar
General Manager (C&RA)

To,

The Secretary,
Jharkhand State Electricity Regulatory Commission (JSERC)
Jharkhand State Housing Board HQ (Old Building), 1st Floor,
Harmu Housing Colony, Ranchi-834002

Sub: - Regarding reply on additional data requirement pertaining to 2nd deficiencies observed in True-up for FY 2020-21 & FY 2021-22, Annual Performance Review for FY 2022-23 and ARR & Tariff for FY 2023-24.

Ref: - Letter no. JSERC/Case (T) No.14 of 2023/523 dated 13.02.2024

Sir,

With reference to the captioned subject and reference, please find enclosed herewith point wise reply on additional data pertaining to 2nd deficiencies observed in True-up petition for FY 2020-21 & FY 2021-22, Annual Performance Review for FY 2022-23 and ARR & Tariff for FY 2023-24 alongwith revised petition for True-up for FY 2020-21 & FY 2021-22, Annual Performance Review for FY 2022-23 and ARR & Tariff for FY 2023-24 in hard as well as soft copy for kind needful.

Encl:-4 sets of hard copies.

Yours faithfully


(Ashish Kumar)
General Manager (C&RA)

Second Note on Discrepancies/ Data gaps on the Petitions for True-Up for FY 2020-21 & FY 2021-22, APR for FY 2022-23 & ARR for FY 2023-24 filed by of Jharkhand Uria Sancharan Nigam Limited (JUSNL).

1. The Petitioner in the previous data gap vide Question No. 5(e) was directed to submit the actual debt, equity, grant, consumer contribution etc. from FY 2020-21 to FY 2023-24 as per the format below:

Source of Funding	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24
Debt				
Equity				
Grant				
Others (Consumer Contribution, deposit works, etc.)				
Total				

In reply to the same, the Petitioner has provided the following,

“Reply: JUSNL would like to submit that the actual debt, equity, grant consumer contribution etc. from FY 2020-21 to FY 2023-24 is provided as below:

Source of Funding	FY 2020-21	FY 2021-22	FY 2022-23	FY 2023-24
Debt	6,566.17	7,199.97	8,082.14	Financial year yet to be closed.
Equity	972.96	1,598.96	1,598.96	
Grant	159.26	171.24	166.09	
other (Consumer Contribution, deposit works etc.)	379.82	440.52	400.90	
Deposit for Electrification, Service Connection	40.91	40.91	40.91	
Total	8,119.12	9,451.60	10,289.00	

With respect to the above, you are directed to submit the Auditor's Certificate for the above submission, along with formula linked excel sheets showing detailed computation of the same, linked with all raw source files for scrutiny of the Commission.

Reply: JUSNL would like to submit that the details submitted regarding the source of funding for the FY 2020-21 and FY 2021-22 have been taken from the Annual Accounts of JUSNL audited by the **Comptroller and Auditor General of India (CAG)**. The Audited Annual Accounts and the Comptroller and Auditor General of India (CAG) report for the FY 2020-21 and FY 2021-22 including the formula linked excel sheets are being enclosed along with this reply as **Annexure-1(soft copy)** for FY 2020-21 and **Annexure-2(soft copy)** for FY 2021-22.

Further, the Annual Accounts for the FY 2022-23 is presently under audit. Therefore, the Audited Annual Accounts for the FY 2022-23 shall be submitted before the Hon'ble Commission once the audit is completed by the statutory auditor & certified by Comptroller and Auditor General of India. The formula linked excel sheet for FY 2022-23 is enclosed as **Annexure-3(soft copy)**.

2. The Commission in the previous data gap vide Question No. 6 had observed that the Petitioner has claimed 'Other Allowances & Relief' as a part of Employee Expenses, equating to Rs. 5.61 Cr. in FY 22-23, and Rs. 5.95 Cr. in FY 23-24. In such regard, The Petitioner is directed to submit detailed justification for its claims, along with documentary evidence and Auditor's Certificate.

In reply to the same, the Petitioner has provided the following,

“Reply: JUSNL would like to submit that the breakup of Other Allowances & Relief as a part of Employee Expenses, equating to Rs. 5.61 Cr. in FY 2022-23 is provided as below:

Sr. No.	Name of Head	FY 2022-23
1	NPS Employer Contribution	4.76
2	EPF and ESI	0.83
3	6- 7 th PRC Arrear	0.02
Total		5.61

With respect to the above, you are directed to submit the Auditor's Certificate for the above submission, along with formula linked excel sheets showing detailed computation of the same, linked with all raw source files for scrutiny of the Commission.

Reply:JUSNL would like to submit that formula linked excels sheets of the Annual Accounts for the FY 2022-23 are being enclosed along with this reply as **Annexure-4(soft copy)** .

Further, the Annual Accounts for the FY 2022-23 is presently under audit. Therefore, the Audited Annual Accounts for the FY 2022-23 shall be submitted before the Hon’ble Commission once the audit is completed by the statutory auditor & certified by Comptroller and Auditor General of India.

3. The Commission in the previous data gap vide Question No. 7 had observed that the Petitioner has claimed 'Miscellaneous Expenses' as a part of Administration & General Expenses, equating to Rs. 5.82 Cr. in FY 20-21, Rs. 6.69 Cr. in FY 21-22, Rs. 7.85 cr. in FY 22-23, and Rs. 8.31 Cr. in FY 23-24. In such regard, The Petitioner was directed to submit detailed justification for its claims, along with documentary evidence and Auditor's Certificate.

In reply to the same, the Petitioner has provided the following,

Reply: JUSNL would like to submit that the 'Miscellaneous Expenses as a part of Administration & General Expenses equating to Rs. 5.82 Cr. in FY 20-21, Rs. 6.69 Cr. in FY 21-22, Rs. 7.85 Cr. in FY22-23isprovidedas below:

	Name of Head	FY 2020-21	FY 2021-22	FY 2022-23
1	Misc. Expenses	0.31	0.43	0.23
2	Bank Charges	0.0045	0.0032	0.0021
3	Training	0.0023	0.0003	0.0231
4	Home Guard	5.24	5.83	7.02
5	Computer Billing	0.26	0.20	0.57
6	PF Inspection & Audit Charges	0. 00	0.02	0.00
7	Other Expenses	0. 00	0.21	0.00
Total		5.8168	6.6935	7.8452

With respect to the above, you are directed to submit the Auditor's Certificate for the above submission, along with formula linked excel sheets showing detailed computation of the same, linked with all raw source files for scrutiny of the Commission.

Reply: JUSNL would like to submit that the details submitted pertaining to the Miscellaneous Expenses for the FY 2020-21 and FY 2021-22 have been taken from the Audited Annual Accounts of JUSNL audited by the Comptroller and Auditor General of India (CAG). The Audited Annual Accounts and the Comptroller and Auditor General of India (CAG) for the FY 2020-21 and FY 2021-22 including the formula linked excel sheet are being enclosed along with this reply as **Annexure-5 (Soft Copy)**for the FY 2020-21 and **Annexure-6 (Soft Copy)** for FY 2021-22. Further, the formula linked excel

sheet of the Annual Accounts for the FY 2022-23 are being enclosed along with this reply as **Annexure-7 (Soft Copy)**.

Further, the Annual Accounts for the FY 2022-23 is presently under audit. Therefore, the Audited Annual Accounts for the FY 2022-23 shall be submitted before the Hon’ble Commission once the audit is completed by the statutory auditor & certified by Comptroller and Auditor General of India.

4. The Commission in the previous data gap vide Question No. 8 had directed the Petitioner to submit the details of arrears paid in from FY 2020-21 to FY 2022-23 on account of Pay revision applicable from 01.01.2016.

In reply to the same, the Petitioner has provided the following:

Reply: JUSNL would like to submit that the details of arrears paid in from FY 2020-21 to FY 2022-23 on account of Pay revision applicable from 01.01.2016 is provided as below:

Sr. No.	Financial Year	Amount Paid (Rs.)
1	2020-21	-
2	2021-22	-
3	2022-23	1,58,290

With respect to the above, you are directed to submit the Auditor's Certificate for the above submission, along with formula linked excel sheets showing detailed computation of the same, linked with all raw source files for scrutiny of the Commission.

Reply: JUSNL would like to submit that the details submitted regarding the arrears paid in from FY 2020-21 to FY 2021-22 on account of Pay revision applicable from 01.01.2016 have been taken from the Annual Accounts of JUSNL audited by the Comptroller and Auditor General of India (CAG). The formula linked excel sheet of the Annual Accounts for the FY 2022-23 are being enclosed along with this reply as **Annexure-8 (Soft Copy)** which is under audit.

5. The Commission in the previous data gap vide Question No. 10 had directed the Petitioner to submit the detailed computation of the Interest on Loan. The Interest on Loans is claimed considering the loan amounts received from the State Government, while the same should be calculated only based on the part of Capitalisation financed by Debt. Hence, the Petitioner is directed to submit the Interest Charges considering the actual capitalisation and repayment equal to depreciation. The Petitioner should also provide the computation of the weighted avg. interest rate applicable from FY 2020-21 to FY 2023-24 based on the actual long term loan portfolio of JUSNL.

In reply to the same, the Petitioner has provided the following,

Reply: JUSNL would like to submit that the interest on loan claimed for FY 2020-21 to FY 2022-23 is based on the Annual Audited Accounts of the said period. The detailed computation of interest on loan for the FY 2020-21 to FY 2022-23 is being enclosed along with this reply as Annexure F.

Further, the detailed computation of weighted rate of interest for the FY 2023-24 is provided as below:

Interest Expenses Projected for FY 2023-24		Rs. Crore
Rate ofInterest	FY 2022-23	
Opening Loan	4603.96	
Loan for additional Capex	668.45	
Loan Surrendered	376.99	
Rate ofInterest	FY 2022-23	
Closing Loan	4895.42	
Average Loan	4749.69	
Interest Paid during the Year	466.29	
Interest Rate	9.82%	

The computation of interest on loanfor the FY 2023-24 is provided as below:

Interest Expenses Projectedfor FY 2023-24

Rs. Crore		
Particulars	FY 2023-24	FY 2023-24
	Approved in TO	Projected
Opening Loan	1109.74	
Loanfor additional Capex	28.97	215.07
Loan Repayment	127.69	167.44
Closing Loan	1011.02	4943.06
Interest Cost on Avg. Loans	95.43	482.94

With respect to the above, you are directed to submit the Auditor's Certificate for the above submission, along with formula linked excel sheets showing detailed computation of the same, linked with all raw source files for scrutiny of the Commission.

Reply: JUSNL would like to submit that formula linked excel sheets showing detailed computation has already been submitted through Annexure-F vide letter dated 31.01.2024.

Further the interest cost projected for the FY 2023-24 has been estimated based on the opening loan portfolio and the weighted average rate of interest for the FY 2022-23. Since the interest on loan has been estimated hence, it is not possible to submit an Auditors Certificate against the same. Once the annual accounts for the FY 2023-24 are available with JUSNL, the actual interest on loan along with the Auditors Certificate shall be submitted to the JUSNL.

6. The Commission in the previous data gap vide Question No. 13 had directed the Petitioner to submit the month-wise, and annual transmission losses for the system certified by the SLDC from FY 2020-21 to FY 2023-24.

In reply to the same, the Petitioner has provided the provisional data for energy wheeled through its system from FY 2020-21 to FY 2022-23 as 'Annexure I' to the reply.

With respect to the above, you are directed to submit the formula linked excel sheets showing detailed computation of the same, linked with all raw source files for scrutiny of the Commission.

Reply: JUSNL would like to submit that the formula linked excel sheets are enclosed along with this reply as **Annexure 9 (Soft Copy)**.

7. The Petitioner has not submitted the TAFM for the Month of March, 2022. Further, the TAFM for FY 2022-23 has also not been submitted. The Petitioner is required to send the requisite data duly certified by the SLDC, along with formula linked excel sheets.

Reply: TAFM for the month of March 2022 duly certified by SLDC has already been submitted before the Hon'ble Commission vide letter dated 31.01.2024, However JUSNL is once again submitting the same as **Annexure-10(Soft Copy)**. Further, the TAFM for FY 2022-23 is under preparation and will be submitted within 02 months before the Hon'ble Commission.

8. It is observed that the closing GFA for FY 20-21 (Rs. 2,610.39 Cr.) does not match with the opening GFA for FY 21-22 (Rs. 3,644.61 cr.). Further, the closing GFA for FY 21-22 (Rs. 3,732.21 cr.) does not match with the opening GFA for FY 22-23 (Rs. 3,871.89 cr.). The Petitioner is directed to justify such deviation along with supporting documentation.

Reply:JUSNL would like to submit that during the FY 2021-22, the JUSNL performed a reconciliation of assets under use and found that certain assets were in use from earlier period but were not capitalized in books of accounts which mainly included work

performed by PGCIL. Accordingly, the opening balances were reinstated having an impact on PPE, depreciation, CWIP, Advances, Creditors and retained earnings. This has resulted in variation between the closing balance of GFA for the FY 2020-21 and the opening balance of GFA for the FY 2021-22. The closing balance of GFA for FY 2020-21 was Rs. 2612.42 Crore and the opening balance of GFA for FY 2021-22 was Rs. 3646.64 Crore. The difference between the closing balance of GFA for FY 2020-21 and opening balance of GFA for FY 2021-22 is Rs. 1034.21 Crore which pertains to schemes capitalized during prior period. The details of these schemes are provided in **Annexure 11(Soft Copy)**.

Similarly, the closing balance of GFA for FY 2021-22 was Rs. 3734.26 Crore and the opening balance of GFA for FY 2022-23 was Rs. 3873.92 Crore. The difference between the closing balance of GFA for FY 2021-22 and opening balance of GFA for FY 2022-23 is Rs. 139.66 Crore which pertains to schemes capitalized during prior period. The details of these schemes are provided in **Annexure 12(Soft Copy)**.

9. The Petitioner has claimed Rs. 0.25 Cr. as 'Depreciation on asset made from consumer contribution ' for FY 2020-21 however, the same has not been claimed for other years. The Petitioner is directed to justify its submission. The Petitioner is also directed to clarify if the asset made from consumer contribution has been de-capitalized in FY 2021-22.

Reply: JUSNL would like to submit that the Depreciation claimed for FY 2020-21 to FY 2022-23 has been claimed as per Annual Accounts of JUSNL. The Hon'ble Commission is requested to approve the depreciation as per Accounts of JUSNL.

10. The Petitioner has claimed interest on loan based on the data as per the audited books of accounts. Similar submission had been made in the previous Petition which has been rejected by the Commission. The Commission has approved the normative interest on loan based on the provisions as per the regulations in the previous order. The Petitioner is directed to clarify why it is consistently making the same claims in violation of the Regulation, when the same has already been rejected by the Commission. The Petitioner is directed to revise its claims as per the regulations and submit a fresh petition with all relevant documentation.

Reply: JUSNL would like to submit that the interest on loan submitted for the FY 2020-21 and FY 2021-22 has been taken from the Annual Accounts audited by the Comptroller and Auditor General of India (CAG). The same have been submitted to the Hon'ble Commission as part of True up for the FY 2020-21 and FY 2021-22. Further, the interest on loan submitted as part of the APR for the FY 2022-23 has been taken from the Annual Accounts for FY 2022-23. It is based on the actual interest liable to be paid by JUSNL against the outstanding loan of the Department and has already been incurred. It is

therefore requested to kindly approve the interest on loan submitted as part of the true up for FY 2020-21 and FY 2021-22 and APR for FY 2022-23.

Further it is to submit that under clause 6.17 of JSERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2015 which states that:

“For controllable parameters,

*(ii) Depreciation and financing cost, which includes cost of debt including working capital (interest), cost of equity (return) shall be trued up on the basis of **audited**/authenticated information and prudence check by the Commission”*

Similarly, under Section A7 clause 7.1 of JSERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2020, which states that:-

*“ 7.1 The Transmission Licensee shall submit along with the application for truing up, details of capital expenditure and additional capitalization, transformation and transmission losses, sources of financing, depreciation, operation and maintenance expenditure, actual loan portfolio with the interest paid, Return on equity, variation in working capital along with other components of ARR, for each year of the Control Period, on the basis of **annual Audited Accounts** as per the Timelines stipulated in the Section A 24”.*

11. The Petitioner has claimed incentive based on overall system availability instead of month wise availability. Similar submission had been made in the previous Petition which has been rejected by the Commission. The Commission has approved the Incentive based on month-wise availability in the previous order. The Petitioner is directed to clarify why it is consistently making the same claims in violation of the Regulation, when the same has already been rejected by the Commission. The Petitioner is directed to revise its claims as per the regulations and submit a fresh petition with all relevant documentation.

Reply: JUSNL would like to submit that as per the direction of Hon’ble Commission, the Incentive based on month-wise availability has been computed and is being submitted in the form of revised petition as **Annexure-13** with this reply.

12. The Petitioner is directed to provide formula linked excel sheets including working excel models for approval of its claimed business plan. The impact on tariff must be claimed in the working excel models along with a fresh petition with all relevant documentation, and the computation must be in line with the provisions of the regulations upto the current control period. Any project spill over to the next control period must be shown and claimed separately for which a separate working model must be provided.

Reply: The formula linked excels sheets including working excel models for approval of its claimed business plan has been already been submitted as Annexure-C vide letter

dated 31.01.2024. However, JUSNL is once again submitting the linked excel sheet of model as **Annexure-14**.

13.The Petitioner has claimed Transmission Capacity Allocation as shown below,

Particulars	Allocation in MW
Total Transmission Capacity (M W)	2,649.10
Total Transmission Capacity allocated to JBVNL (M W)	2,579.10
Total Transmission Capacity allocated to Railways (M W)	70.00

The Petitioner in this regard is directed to provide documentation certified by the SLDC in order to ascertain the claimed Transmission Capacity Allocation.

Reply: JUSNL would like to submit that Under Section A3 Sl. No 6 of JSERC (Terms and Conditions for Determination of Transmission Tariff) Regulations, 2020, states that: *‘Allotted Transmission Capacity’ means and includes the power transfer in MW between the specified point(s) of injection and point(s) of drawl allowed to a Long and Medium-Term Transmission Customer on the intra-State transmission system under the normal circumstances and the expression “allotment of capacity” shall be construed accordingly:*

Provided that the Allotted Transmission Capacity to a Long-Term Transmission Customer and Medium -Term Transmission Customer shall be sum of the generating capacities allocated to the Long-Term Transmission Customer and Medium-Term Transmission Customer respectively

Accordingly the Transmission Capacity of JBVNL has been determined by considering the total power purchase allocation as submitted in the ARR and Tariff Petition filed by JBVNL which is 2579.10 MW. Further, presently the total power purchase capacity allocated to Railway is 70 MW. Hence, the total transmission capacity of the system is 2649.10 MW.

14.The Petitioner has claimed Employee expenses as shown below,

No.	Particulars	Approved in T.O. dtd24.02.2018	Actual for FY2020-21	Ref from Accounts
1	Employee Expense without Terminal Benefits	38.52	59.41	Note 23
2	Terminal Benefits	3.85	5.20	Note 23

	Total	42.37	64.61	Note 23
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However, it is observed that Note 23 of the Audited Accounts state as extracted below,

"Note 23: Employee Benefits Expense

Particulars	As at 31 st March 2021
	Amount (Rs. In lakh)
(a) Salaries and incentives	6,155.15
(b) Staffwelfare expenses	
(c) Medical Expenses Reimbursement	32.75
(d) Earned Leave Encashment	59.11
(e) Terminal Benefits	532.60
Total	6,780.03

The Petitioner is directed to justify such deviation by segregating the accounts of the transmission licensee and the SLDC along with Auditor's Certificate and formula linked excel sheets showing detailed computation, linked with all raw source files for scrutiny of the Commission. Further, the Commission vide Order dated June 23, 2023 has issued theOrder on APR of FY 2020-21, as such, the Petitioner is directed to compare Order dated June 23, 2023 instead of Order dated February 24, 2018, and submit a fresh petition with all relevant documentation.

Reply: JUSNL has submitted the revised petition after segregating the accounts of the transmission licensee and the SLDC vide letter dated 31.01.2024.

Further, the expenses have been compared with the Order dated June 23, 2023 and being submitted in the form of revised petition as **Annexure 13** with this reply.

15.The Petitioner has claimed Administrative & General Expense as shown below,

Particulars	Approved in T. O. dtd 24.02.2018	Actual for FY 2020-21	Ref.' from Accounts
A&G Expenses	9.66	9.24	Note 25

However, it is observed that Note 25 of the Audited Accounts state as extracted below,

"Note 25: Other Expenses

Particulars	As at 31 st March 2021
	Amount (Rs. In lakh)
Rent Rates & Taxes	8.98
Insurance	4.82
Telephone Charges, Postage, telegram & Telex chgs.	108.75
Legal Charges	15.94
Audit Fees	9.90
Consultancy Charges	2.05
Technical Fees	8.22
Other Professional Charges Collection and Remittance Charge	
Conveyance Expenses	222.57
Fees & subscription	35.77
Books & Periodicals	1.39
Printing & Stationary	19.05
Water Charges	0.02
Electric Charges	0.29
Entertainment Charges	4.54
Miscellaneous Expenses	581.88
Freight	
Holding Company Expenses	
Other Purchase related Exps.	0.49
Total	1,024.65

The Petitioner is directed to justify such deviation by segregating the accounts of the transmission licensee and the SLDC along with Auditor's Certificate and formula linked excel sheets showing detailed computation, linked with all raw source files for scrutiny of the Commission. Further, the Commission vide Order dated June 23, 2023 has issued the Order on APR of FY 2020-21, as such, the Petitioner is directed to compare Order dated

June 23, 2023 instead of Order dated February 24, 2018, and submit a fresh petition with all relevant documentation.

Reply:JUSNL has submitted the revised petition after segregating the accounts of the transmission licensee and the SLDC vide letter dated 31.01.2024.

Further, the expenses have been compared with the Order dated June 23, 2023 and being submitted in the form of revised petition as **Annexure 13** with this reply.

16. The Petitioner has claimed Repair & Maintenance Expense as shown below,

Particulars	Approved in T. O. dtd. 24.02.2018	Actualfor FY 2020-21	Ref from Accounts
Opening GFA	4190.27	1,927.82	Note 13
"K" Factor	2.23%		
R&M Expense	93.30	29.52	Note 25

However, it is observed that Note 25 of the Audited Accounts state as extracted below,

<u>Repairs & Maintenance</u>	
Particulars	As at 31 st March 2021
	Amount (Rs. In lakh)
Plant and Machinery	2,134.27
Building	178.73
Civil Works	47.01
Line Cable Net Works	616.96
Vehicles	0.44
Furniture and Fixtures	
Office Equipment	6.66
Total	2,984.54

The Petitioner is directed to justify such deviation by segregating the accounts of the transmission licensee and the SLDC along with Auditor's Certificate and formula linked excel sheets showing detailed computation, linked with all raw source files for scrutiny of

the Commission. Further, the Commission vide Order dated June 23, 2023 has issued the Order on APR of FY 2020-21, as such, the Petitioner is directed to compare Order dated June 23, 2023 instead of Order dated February 24, 2018, and submit a fresh petition with all relevant documentation.

Reply:JUSNL has submitted the revised petition after segregating the accounts of the transmission licensee and the SLDC vide letter dated 31.01.2024.

Further, the expenses have been compared with the Order dated June 23, 2023 and being submitted in the form of revised petition as **Annexure 13** with this reply.

17. The Petitioner has claimed Interest on Loan as shown below,

Particulars	Approved in T. O. did. 24.02.2018	Actual for FY 2020-21	Ref from Accounts
Interest on Loan	190.14	503.21	Note 24

However, it is observed that Note 24 of the Audited Accounts state as extracted below,

Particulars	As at 31 st March 2021
	Amount (Rs. In lakh)
Interest on State Govt. Loan	50,143.19
Interest on Group Saving Scheme	6.19
Interest on G.P.F	176.11
Interest on Security Depositfrom Staff	0.03
Total	50,325.52

The Petitioner is directed to justify such deviation by segregating the accounts of the transmission licensee and the SLDC along with Auditor's Certificate and formula linked excel sheets showing detailed computation, linked with all raw source files for scrutiny of the Commission. Further, the Commission vide Order dated June 23, 2023 has issued the Order on APR of FY 2020-21, as such, the Petitioner is directed to compare Order dated June 23, 2023 instead of Order dated February 24, 2018, and submit a fresh petition with all relevant documentation.

Reply:JUSNL has submitted the revised petition after segregating the accounts of the transmission licensee and the SLDC vide letter dated 31.01.2024.

Further, the expenses have been compared with the Order dated June 23, 2023 and being submitted in the form of revised petition as **Annexure 13** with this reply.

18. The Petitioner has claimed Revenue from Operation as shown below,

Particulars	Approved in T. O. dtd. 24.02.2018	Actual for FY 2020-21	Ref from Accounts
Revenue from Existing Tariff	705.53	229.58	Note 21

However, it is observed that Note 21 of the Audited Accounts state as extracted below,

Particulars	As at 31 st March 2021
	Amount (Rs. In lakh)
a. Sale of Products;	
a. Sale of Services;	
Transmission Charges Recovery:-	
(i) Transmission Charges (Railway)	896.94
(ii) Transmission Charges (JBVNL)	22,061.45
b. Other operating revenues	
Total	22, 958.40

The Petitioner is directed to justify such deviation by segregating the accounts of the Transmission licensee and the SLDC along with Auditor's Certificate and formula linked excel sheets showing detailed computation, linked with all raw source files for scrutiny of the Commission. Further, the Commission vide Order dated June 23, 2023 has issued the Order on APR of FY 2020-21, as such, the Petitioner is directed to compare Order dated June 23, 2023 instead of Order dated February 24, 2018, and submit a fresh petition with all relevant documentation.

Reply:JUSNL has submitted the revised petition after segregating the accounts of the transmission licensee and the SLDC vide letter dated 31.01.2024.

Further, the expenses have been compared with the Order dated June 23, 2023 and being submitted in the form of revised petition as **Annexure 13** with this reply.

19. The Petitioner has claimed Employee expenses as shown below,

No.	Particulars	Approved in T.O. dtd.23.06.2023	Actualfor FY 2021-22	Ref from Accounts
1	Employee Expense without Terminal Benefits	43.86	70.36	Note 23
2	Terminal Benefits	5.33	14.88	Note 23
	Total	49.19	85.24	Note 23

However, it is observed that Note 23 of the Audited Accounts state as extracted below,

"Note 23: Employee Benefits Expense

Particulars	As at 31 st March 2022
	Amount (Rs. In lakh)
(a) Salaries and incentives	7,099.99
(b) Staffwelfare expenses	16.35
(c) Medical Expenses Reimbursement	42.35
(d) Earned Leave Encashment	388.41
(e) Terminal Benefits	1,550.57
Total	9, 04 7.67

The Petitioner is directed to justify such deviation by segregating the accounts of the transmission licensee and the SLDC along with Auditor's Certificate and formula linked excel sheets showing detailed computation, linked with all raw source files for scrutiny of the Commission.

Reply:JUSNL has submitted the revised petition after segregating the accounts of the transmission licensee and the SLDC vide letter dated 31.01.2024.

Further, the expenses have been compared with the Order dated June 23, 2023 and being submitted in the form of revised petition as **Annexure 13** with this reply.

20. The Petitioner has claimed Administrative & General Expense as shown below,

Particulars	Approved in T. O dtd. 23.06.2023	Actual for FY 2021-22	Ref from Accounts
A&G Expenses	8.98	11.33	Note 25

However, it is observed that Note 25 of the Audited Accounts state as extracted below,

"Note 25: Other Expenses

Administrative Expenses	
Particulars	As at 31 st March 2022
	Amount (Rs. In lakh)
Rent Rates & Taxes	19.89
Insurance	3.26
Telephone Charges, Postage, telegram & Telex chgs.	20.71
Legal Charges	33.14
Audit Fees	5.49
Consultancy Charges	12.39
Technical Fees	13.84
Other Professional Charges/ Collection and Remittance Charge	32.19
Conveyance Expenses	201.45
Fees & subscription	75.96
Books & Periodicals	1.43
Printing & Stationary	21.10
Advertisement	0.94
Water Charges	0.06
Electric Charges	
Entertainment Charges	28.69
Miscellaneous Expenses	669.01
Other Purchase related Exps.	0.08
Total	1,143.08

The Petitioner is directed to justify such deviation by segregating the accounts of the transmission licensee and the SLDC along with Auditor's Certificate and formula linked excel sheets showing detailed computation, linked with all raw source files for scrutiny of the Commission.

Reply:JUSNL has submitted the revised petition after segregating the accounts of the transmission licensee and the SLDC vide letter dated 31.01.2024.

Further, the expense has been compared with the Order dated June 23, 2023 and being submitted in the form of revised petition as **Annexure 13** with this reply.

21. The Petitioner has claimed Repair & Maintenance Expense as shown below,

Particulars	Approved in TO. dtd. 23.06.2023	Actual for FY 2021-22	Ref from Accounts
Opening GFA	1,920.09	3,644.61	Note 13A
"K" Factor	2.23%		
Expense	45.42	24.27	Note 25

However, it is observed that Note 25 of the Audited Accounts state as extracted below,

Particulars	Repairs & Maintenance
	As at 31 st March 2022 Amount (Rs. In lakh)
Plant and Machinery	1,699.01
Building	127.78
Civil Works	84.59
Line Cable Net Works	517.84
Vehicles	2.69
Furniture and Fixtures	0.22
Office Equipment	9.74
Total	2, 441.88

The Petitioner is directed to justify such deviation by segregating the accounts of the transmission licensee and the SLDC along with Auditor's Certificate and formula linked excel sheets showing detailed computation, linked with all raw source files for scrutiny of the Commission.

Reply:JUSNL has submitted the revised petition after segregating the accounts of the transmission licensee and the SLDC vide letter dated 31.01.2024.

Further, the expense has been compared with the Order dated June 23, 2023 and being submitted in the form of revised petition as **Annexure 13** with this reply.

22. The Petitioner has claimed Interest on Loan as shown below,

Particulars	Approved in T. O. dtd. 23.06.2023	Actual for FY 2021-22	Ref from Accounts
Interest on Loan	83.48	439.00	Note 24

However, it is observed that Note 24 of the Audited Accounts state as extracted below,

Particulars	As at 3 rd March 2022
	Amount (Rs. In lakh)
Interest on State Govt. Loan	43,900.15
Interest on Group Saving Scheme	0.00
Interest on G.P.F	0.00
Interest on Security Deposit from Staff	0.03
Total	43,900.18

The Petitioner is directed to justify such deviation by segregating the accounts of the transmission licensee and the SLDC along with Auditor's Certificate and formula linked excel sheets showing detailed computation, linked with all raw source files for scrutiny of the Commission.

Reply:JUSNL has submitted the revised petition after segregating the accounts of the transmission licensee and the SLDC vide letter dated 31.01.2024.

Further, the expense has been compared with the Order dated June 23, 2023 and being submitted in the form of revised petition as **Annexure 13** with this reply.

23. The Petitioner has claimed Revenue from Operation as shown below,

Particulars	Approved in T. O. dtd. 23.06.2023	Actualfor FY 2021-22	Ref from Accounts
Revenue from Existing Tariff	342.01	249.65	Note 21

However, it is observed that Note 21 of the Audited Accounts state as extracted below,

Particulars	As at 31 st March 2022
	Amount (Rs. In lakh)
a. Transmission Charges	
(i) Transmission Charges (Railway)	1,339.45
(ii) Transmission Charges (JBVNL)	23,627.23
b. Other operating revenues	12.01
Less	
Rebate	13.52
Total	24,965.17

The Petitioner is directed to justify such deviation by segregating the accounts of the transmission licensee and the SLDC along with Auditor's Certificate and formula linked excel sheets showing detailed computation, linked with all raw source files for scrutiny of the Commission.

Reply: JUSNL has submitted the revised petition after segregating the accounts of the transmission licensee and the SLDC vide letter dated 31.01.2024.

Further, the expenses have been compared with the Order dated June 23, 2023 and being submitted in the form of revised petition as **Annexure 13** with this reply.

24. The Petitioner has claimed Employee expenses as shown below,

No.	Particulars	Approved in T. O. dtd. 23.06.2023	Actual for FY2022-23	Ref from Accounts
	Employee Expense without Terminal Benefits	46.53	78.80	Note 23
2	Terminal Benefits	5.33	33.66	Note 23
	Total	51.86	112.46	Note 23

However, it is observed that Note 23 of the Audited Accounts state as extracted below,

"Note 23: Employee Benefits Expense

Particulars	As at 31 ^M March 2023
	Amount (Rs. In lakh)
(a) Salaries and incentives	7, 704.26
(b) Staffwelfare expenses	19.56
(c) Medical Expenses Reimbursement	75.92
(d) Earned Leave Encashment	3,401.42
(e) Terminal Benefits	560.76
Total	11,761.92

The Petitioner is directed to justify such deviation by segregating the accounts of the transmission licensee and the SLDC along with Auditor's Certificate and formula linked excel sheets showing detailed computation, linked with all raw source files for scrutiny of the Commission.

Reply:JUSNL has submitted the revised petition after segregating the accounts of the transmission licensee and the SLDC vide letter dated 31.01.2024.

Further, the expense has been compared with the Order dated June 23, 2023 and being submitted in the form of revised petition as **Annexure 13** with this reply.

25. The Petitioner has claimed Administrative & General Expense as shown below,

Particulars	Approved in T. O. did. 23.06.2023	Actual for FY 2022-23	Ref from Accounts
A&G Expenses	9.53	12.18	Note 25A

However, it is observed that Note 25A of the Audited Accounts state as extracted below,

Particulars	As at 31 st March 2023
	Amount (Rs. In lakh)
Rent Rates & Taxes	21.40
Insurance	4.11
Telephone Charges, Postage, telegram & Telex chgs.	23.02
Legal Charges	29.63

Audit Fees	4.72
Consultancy Charges	17.44
Technical Fees	29.36
Other Professional Charges/ Collection and Remittance Charge	29.10
Conveyance Expenses	257.07
Fees & subscription	77.37
Books & Periodicals	1.32
Printing & Stationary	18.87
Advertisement	
Water Charges	0.08
Electric Charges	1.28
Entertainment Charges	17.20
Miscellaneous Expenses	784.73
Other Purchase related Exps.	0.49
Total	1,317.20

The Petitioner is directed to justify such deviation by segregating the accounts of the transmission licensee and the SLDC along with Auditor's Certificate and formula linked excel sheets showing detailed computation, linked with all raw source files for scrutiny of the Commission.

Reply:JUSNL has submitted the revised petition after segregating the accounts of the transmission licensee and the SLDC vide letter dated 31.01.2024.

Further, the expenses have been compared with the Order dated June 23, 2023 and being submitted in the form of revised petition as **Annexure 13** with this reply.

26. The Petitioner has claimed Repair & Maintenance Expense as shown below,

Particulars	Approved in T. O. did. 23.06.2023	Actual for FY 2022-23	Ref from Accounts
Opening GFA	2,023	3,871.89	Note
'K" Factor	2.23%		
R&M Expense	7.87	44.39	Note 25M

However, it is observed that Note 25 of the Audited Accounts state as extracted below,

Repairs & Maintenance

Particulars	As at 31 st March 2023
	Amount (Rs. In lakh)
Plant and Machinery	3,303.45
Building	202.67
Civil Works	51.29
Line Cable Net Works	885.36
Vehicles	2.36
Furniture and Fixtures	1.95
Office Equipment	14.20
Total	4,461.28

The Petitioner is directed to justify such deviation by segregating the accounts of the transmission licensee and the SLDC along with Auditor's Certificate and formula linked excel sheets showing detailed computation, linked with all raw source files for scrutiny of the Commission.

Reply:JUSNL has submitted the revised petition after segregating the accounts of the transmission licensee and the SLDC vide letter dated 31.01.2024.

Further, the expense has been compared with the Order dated June 23, 2023 and being submitted in the form of revised petition as **Annexure 13** with this reply.

27.The Petitioner has claimed Interest on Loan as shown below,

Particulars	Approved in T. O. dtd. 23.06.2023	Actual for FY 2022-23	Ref from Accounts
Interest on Loan	91.48	466.29	Note 24

However, it is observed that Note 24 of the Audited Accounts state as extracted below,

Particulars	As at 3 rd March 2023
	Amount (Rs. In lakh)
Interest on State Govt. Loan	46,629.26
Interest on Security Deposit from Staff	0.03
Total	46,629.29

The Petitioner is directed to justify such deviation by segregating the accounts of the transmission licensee and the SLDC along with Auditor's Certificate and formula linked excel sheets showing detailed computation, linked with all raw source files for scrutiny of the Commission.

Reply:JUSNL has submitted the revised petition after segregating the accounts of the transmission licensee and the SLDC vide letter dated 31.01.2024.

Further, the expense has been compared with the Order dated June 23, 2023 and being submitted in the form of revised petition as **Annexure 13** with this reply.

28.The Petitioner has claimed Revenue from Operation as shown below,

Particulars	Approved in T. O. did. 23.06.2023	Actual for FY 2022-23	Ref from Accounts
Revenue front Existing Tariff	364.77	299.25	Note 21

However, it is observed that Note 21 of the Audited Accounts state as extracted below,

Particulars	As at 31 st March 2023
	Amount (Rs. In lakh)

a. Transmission Charges	
(i) Transmission Charges (Railway)	743.86
(ii) Transmission Charges (.JBVNL)	25, 712.27
b. Other operating revenues	3,258.49
c. Receipts from consumers for capital works	217.21
Less	
Rebate	7.17
Total	29,924.67

The Petitioner is directed to justify such deviation by segregating the accounts of the Transmission licensee and the SLDC along with Auditor's Certificate and formula linked excel sheets showing detailed computation, linked with all raw source files for scrutiny of the Commission.

Reply:JUSNL has submitted the revised petition after segregating the accounts of the transmission licensee and the SLDC vide letter dated 31.01.2024.

Further, the expense has been compared with the Order dated June 23, 2023 and being submitted in the form of revised petition as **Annexure 13** with this reply.