



ADANI POWER LTD. (APL)
PETITION FOR TRUE UP OF FY 2022-
23 & FY 2023-24, PROVISIONAL
TRUE UP OF FY 2024-25
AND ARR & MUTLI YEAR TARIFF
(MYT) FOR FY 2025-26 TO FY 2029-
30
Executive Summary
(For Adani Dahanu Thermal Power
Station)

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1 INTRODUCTION

Regulation 5.1(a) of MYT Regulations ,2024 provides for filing of Multi Year Tariff Petition comprising of:

1. Truing-up for FY 2022-23 and FY 2023-24 to be carried out under MERC(Multi Year Tariff) Regulations, 2019.
2. Provisional Truing up for FY 2024-25 to be carried out under MYT Regulations, 2019.
3. Projections of Aggregate Revenue Requirement (ARR), Fixed charges and Energy charges for each year of fifth Control Period.

The present Petition has been filed for truing up of FY 2022-23 and FY 2023-24, provisional truing up of FY 2024-25 and projection of ARR from FY 2025-26 to FY 2029-30 in accordance with the above provision of MYT Regulations, 2024.

1.1 Change of ownership of Adani Dahanu Thermal Power Station (ADTPS) from Adani Electricity Mumbai Ltd (AEML) to Adani Power Ltd.

ADTPS, with a capacity of 500 MW (2 units of 250 MW each), was commissioned in the year 1995 and had been a part of AEML. In order to improve the resource management and ensure effective supply of power from ADTPS, AEML in its board meeting held on 24.07.2024 had decided to divest the ownership of ADTPS to another company within the Adani group, i.e. Adani Power Ltd. The divestment has been carried out on 30th September 2024. It is further submitted that since APL owns and operates a large number of generating assets (aggregating to operating installed capacity - 15.850 MW and under construction installed capacity – 2,950MW), it is in the best position to own and operate ADTPS efficiently. The above transfer of ADTPS was also necessary for meeting AEML's ESG obligations. Pursuant to the transfer of ADTPS, AEML-D and APL filed a petition before the Hon'ble Commission for approval of PPA with ADTPS owned and operated by Adani Power Ltd. before the Hon'ble Commission (Case no. 154 of 2024). The tenure of PPA between AEML-D and Adani Power Ltd. for power supply from ADTPS is till March 2025. AEML-D had also filed an Interlocutory Application (IA no. 47 of 2024) for urgent hearing in the matter, against which hearing was held on 20th September 2024. The Hon'ble Commission vide interim order dated 20th September 2024 had allowed AEML-D to continue the procurement of power from ADTPS owned

and operated by new entity i.e. APL. The relevant extract of the referred interim Order is as below:

"4. Accordingly, the Commission allows AEML-D to continue the procurement of power from ADTPS owned and operated by new entity i.e. APL with the same terms and conditions of the existing Power Procurement Arrangement between AEML-D and AEML-G till further Order in the present matter, subject to the condition that there would be no adverse impact on the supply of power or Tariff payable by the consumers or any other adverse consequences."

APL submits that there will be no adverse impact on the supply of power and/or tariff as determined by the Hon'ble Commission under Section 62 of the Electricity Act, 2003, since tariff will continue to be determined as per the regulated asset base approved by the Hon'ble Commission and under the terms of the MYT Regulations as prevailing from time to time.

2 TRUING UP OF FY 2022-23 AND FY 2023-24, PROVISIONAL TRUING UP OF FY 2024-25

2.1 Operational Performance for FY 2022-23, FY 2023-24 and FY 2024-25

ADTPS has achieved a PLF of 79.88% and has maintained availability of 95.83% for FY 2022-23 which is well above the Normative Annual Plant Availability Factor (NAPAF) of 85% specified in MYT Regulations, 2019. Similarly, ADTPS has achieved a PLF of 73.96% and has maintained availability of 91.03% for FY 2023-24 which is well above the Normative Annual Plant Availability Factor (NAPAF) of 85% specified in MYT Regulations, 2019. As regards other performance parameters, ADTPS performance was better than the norms in most parameters in FY 2022-23 and FY 2023-24. For FY 2024-25, APL has considered the actual net generation till September 2024 by ADTPS and estimated the net generation for balance six months of FY 2024-25 considering PLF of 75%, since historically ADTPS achieves PLF of around 75% annually. Other performance parameters have been considered at normative level.

2.2 Energy Charges for FY 2022-23, FY 2023-24 and FY 2024-25

APL has calculated the Energy Charges for FY 2022-23 and FY 2023-24 considering actual price of fuel and calorific values with normative parameters as per MYT Regulations, 2019. For FY 2024-25, APL has determined the Energy charges considering net generation till September 2024 and estimated net generation for balance six months of FY 2024-25. GCV and coal cost for balance six months has been estimated at the same level as that of first six months of FY 2024-25.

2.3 Fixed charges for FY 2022-23, FY 2023-24 and FY 2024-25

APL has calculated has calculated the elements of fixed charges for FY 2022-23, FY 2023-24 and FY 2024-25 in accordance with MYT Regulations, 2019.

- APL has calculated the normative O&M expense for FY 2022-23 and FY 2023-24 as per MYT Regulations, 2019 and compared it with actual O&M expenses to determine the Net Entitlement in O&M expense. For FY 2024-25, O&M expense has been estimated on normative basis as per MYT Regulations, 2019.
- APL has considered the actual capitalization in FY 2022-23 and FY 2023-24 and has computed the depreciation for FY 2022-23 and FY 2023-24 as per MYT Regulations, 2019. For FY 2024-25, APL has computed the depreciation

considering estimated capitalization in FY 2024-25, as per rates specified in MYT Regulations, 2019.

- Interest on loans and Return on Equity (grossed up by effective tax rate) have been calculated considering normative debt equity ratio as per as per MYT Regulations, 2019.
- Interest on Working Capital (normative) for FY 2022-23 and FY 2023-24 has been calculated as per the formula specified in MYT Regulations, 2019. For FY 2024-25, APL has claimed the Interest on Working Capital on normative basis.
- Actual Non Tariff Income and actual Revenue from sale of power has been considered for determining the revenue gap/(surplus) for FY 2022-23 and FY 2023-24. For FY 2024-25, APL has considered the estimated Non Tariff Income and Revenue from sale of power to determine the revenue gap/(surplus).

2.4 Revenue gap/ (surplus) for FY 2022-23 and FY 2023-24, Provisional Revenue gap/ (surplus) for FY 2024-25

The summary of truing up for FY 2022-23 is shown in table below:

Table 1 : Revenue gap / (surplus) for FY 2022-23

Particulars/ (Rs. Crore)	MTR Order	Truing up
Fuel Related Expenses	1,361.34	1,389.89
PLF incentive		2.38
Operation & Maintenance Expenses	189.19	202.17
Wage revision arrears		3.70
Expense shifted from Non-DPR to O&M		3.96
Rescheduling charges	0	0.01
Depreciation Expenses	37.76	38.32
Interest on Long-term Loan Capital	12.43	13.27
Financing Charges	0	0.18
Interest on Working Capital	22.18	31.95
Total Revenue Expenditure	1,622.90	1,685.82
Add: Return on Equity Capital	111.84	118.88
Less: Non-Tariff Income	15.30	12.13
Aggregate Revenue Requirement	1,719.44	1,792.58
Share of Efficiency (loss)/ Gain in Fuel cost		35.34
Share of Efficiency (loss)/ Gain in O&M Expense		(5.32)
Share of Efficiency (loss)/ Gain in Interest on Working Capital		(10.53)
Total ARR		1,812.06
Revenue		

Particulars/ (Rs. Crore)	MTR Order	Truing up
Revenue from sale of electricity - Fixed charges	337.11	337.11
Revenue from sale of electricity - Variable Charges	1,361.34	1,468.86
Total Revenue Gap/(Surplus)	20.99	6.09

The summary of truing up for FY 2023-24 is shown in table below:

Table 2 : Revenue gap / (surplus) for FY 2023-24

Particulars/ (Rs. Crore)	MTR Order	Truing up
Fuel Related Expenses	1,479.91	1,071.50
Operation & Maintenance Expenses	198.36	201.27
Wage Revision Arrears	0	0.87
Rescheduling charges	0	0.01
Depreciation Expenses	38.29	31.24
Interest on Long-term Loan Capital	10.77	11.76
Foreign exchange rate variation	0	4.54
Financing Charges	0	0.21
Interest on Working Capital	23.80	16.85
Total Revenue Expenditure	1,751.13	1,338.25
Add: Return on Equity Capital	113.28	122.07
Less: Non-Tariff Income	19.15	10.83
Aggregate Revenue Requirement	1,845.26	1,449.49
Share of Efficiency (loss)/ Gain in Fuel cost		22.29
Share of Efficiency (loss)/ Gain in Interest on Working Capital		-0.48
Total ARR		1,471.30
Revenue		
Revenue from sale of electricity - Fixed charges	365.35	365.35
Revenue from sale of electricity - Variable Charges	1,479.91	1,088.80
Total Revenue Gap/(Surplus)	0	17.15

The summary of provisional truing up of FY 2024-25 is shown in table below:

Table 3 : Provisional Revenue gap / (surplus) for FY 2024-25

Particulars / (Rs. Crore)	MTR Order	FY 2024-25 (Estimates)
Fuel Related Expenses	1440.48	1330.44

Particulars / (Rs. Crore)	MTR Order	FY 2024-25 (Estimates)
Operation & Maintenance Expenses	207.98	214.11
Expense shifted from Non-DPR to O&M		22.58
Depreciation	38.99	30.36
Interest on Loan Capital	9.49	10.66
Interest on Working Capital	24.05	39.10
Total Revenue Expenditure	1720.99	1647.25
Add: Return on Equity Capital	114.97	114.24
Less: Non-Tariff Income	19.15	10.83
Total ARR	1816.81	1750.66
Revenue		
Fixed charge	376.33	376.33
Energy charge	1,440.48	1,330.44
Revenue gap/ (surplus)	0	43.89

The cumulative revenue gap / (surplus) till FY 2024-25 is shown in table below:

Table 4 : Revenue gap / (surplus) till FY 2024-25

Particulars	Rs. Crore
Incremental Revenue Gap/(surplus) for FY 2022-23	(14.89)
Carrying cost for FY 2022-23	(2.51)
Revenue gap/ (surplus) for FY 2023-24	17.15
Carrying cost for FY 2023-24	3.56
Provisional revenue gap for FY 2024-25	43.89
Total	47.20

3 AGGREGATE REVENUE REQUIREMENT FROM FY 2025-26 TO FY 2029-30

3.1 Operational parameters from FY 2025-26 to FY 2029-30

APL has considered the operational parameters such as Heat Rate, Auxiliary consumption, transit loss, specific fuel consumption etc. as per MYT Regulations, 2024. For working out availability, APL has considered the planned outages and expected unplanned outages for ADTPS annually from FY 2025-26 to FY 2029-30.

3.1 Energy Charges from FY 2025-26 to FY 2029-30

For projecting the Energy charges for each year of next Control Period, APL has considered the actual GCV and landed cost of fuel from March 2024 to May 2024. APL has considered the entire generation from raw coal only since the cost of imported coal is significantly higher and use of imported coal would only increase the fuel cost.

3.2 Fixed charges from FY 2025-26 to FY 2029-30

APL has calculated has calculated the elements of fixed charges from FY 2025-26 to FY 2029-30 in accordance with MYT Regulations, 2024.

- APL has calculated the normative O&M expense from FY 2025-26 to FY 2029-30 as per MYT Regulations, 2024.
- APL has considered the projected capitalisation from FY 2025-26 to FY 2029-30 required for healthy operation of ADTPS plant. APL has computed the depreciation for each year of the Control Period, as per provisions of MYT Regulations, 2024.
- Interest on loans and Return on Equity (grossed up by effective tax rate) have been calculated considering normative debt equity ratio as per MYT Regulations, 2024.
- Interest on Working Capital from FY 2025-26 to FY 2029-30 has been calculated on normative basis as per provisions of MYT Regulations, 2024
- APL has projected the Non tariff income from FY 2025-26 to FY 2029-30 at the same level as that of FY 2023-24.

The summary of ARR for ADTPS from FY 2025-26 to FY 2029-30 is shown in table below:

Table 5 : Aggregate Revenue Requirement from FY 2025-26 to FY 2029-30

Particulars/ (Rs. Crore)	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	FY 2029-30
Fuel Related Expenses	2,023.39	1,981.75	2,082.73	2,209.60	2,201.25
Operation & Maintenance Expenses	235.44	246.79	258.76	271.39	284.70
Depreciation	34.47	40.99	49.10	54.66	57.80
Interest on Loan Capital	13.50	20.09	27.27	32.20	33.00
Interest on Working Capital	60.36	61.60	64.17	66.54	68.47
Return on Equity	131.56	140.32	150.17	158.63	163.84
Less: Non Tariff Income	10.83	10.83	10.83	10.83	10.83
Net Aggregate Revenue Requirement	2,487.89	2,480.70	2,621.36	2,782.19	2,798.23
Revenue gap till FY 2024-25	47.20				
Total ARR	2,535.09	2,480.70	2,621.36	2,782.19	2,798.23

4 PRAYERS

APL prays that the Hon'ble Commission may be pleased to:

1. Admit the petition as submitted herewith;
2. Approve the actual revenue gap/ surplus arising on account of truing-up for FY 2022-23 and FY 2023-24 along with the carrying / holding cost till FY 2025-26 as worked out in this petition;
3. Approve the provisional ARR and revenue gap/ surplus for FY 2024-25 as worked out in this petition
4. Approve the Aggregate Revenue Requirement (ARR) from FY 2025-26 to FY 2029-30 as projected in this Petition;
5. Allow recovery of cumulative revenue gap/ surplus till FY 2024-25 as worked out in this Petition by including it in the ARR for FY 2025-26;
6. Allow specific deviations from the MYT Regulations, 2019 and MYT Regulations, 2024, wherever sought in this Petition;
7. Grant specific prayers, wherever made in this Petition, for reconsideration / relaxation of rulings made in previous Tariff Orders;
8. Allow additions / alterations / modifications/ changes to the Petition at a future date;
9. Condone any inadvertent errors/ inconsistencies/ omissions/ rounding off differences, etc. as may be there in the said Petition;
10. Allow any other relief or pass Order and direction, which the Commission deems fit to be issued.

In light of the prayers made hereinabove, the Petitioner requests the Hon'ble Commission to consider the same and grant us appropriate relief.

Place Mumbai
Date 02.01.2025



Akshay Mathur
Authorized Representative
Adani Power Ltd.