

List of Data Gaps

- Utility** : ADANI POWER LTD. (APL) - Adani Dahanu Thermal Power Station (ADTPS)
Case No. : 188 of 2024
Subject : MYT PETITION FOR TRUE UP OF FY 2022-23 & FY 2023-24, PROVISIONAL TRUE UP OF FY 2024-25 AND MYT CONTROL PERIOD FOR FY 2025-26 TO FY 2029-30
Data Gaps Set : Data Gap Set – III dated - 03/01/2025

Sr. No.	Reference	Data Query
Error in the Petition		
1.	Para 2.2.3	As per the replies to the data gaps, APL has stated that the coal quantum towards Transit loss is to be revised to 2644.70 MT. However, in para 2.2.3, it is still mentioned as 2444.70 MT. APL to rectify the same. APL Reply: The typo error in the Petition has been rectified and revised Petition has already been submitted to Hon'ble Commission on 03.01.2025.
2.	Table 58	Weighted Average GCV (As Received) and GCV Loss in transit to be reconcile with F2.2 APL Reply: The typo error in the Petition has been rectified and revised Petition has already been submitted to Hon'ble Commission on 03.01.2025.
Additional Requirement / justification		
3.	Status of FSA	APL to provide the status of FSA and in case of any expiry in between the control period, the action plan to provide coal for generation to be provided. APL Reply: The FSA of Dahanu plant with SECL is valid till 31st Mar'2029. Being embedded plant for city of Mumbai, APL will suitably take up with MoP/MoC/CEA/CIL to extend the FSA to be concurrent with extended PPA validity / control period.
4.	Para 3.9	In Original Petition, FERV Loss was segregated in proportion of actual loans to regulatory loans of Generation, Transmission and Distribution business and accordingly has claimed only Rs. 38.46 Crore. However, as per the Revised Petition, the whole

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		<p>FERV amount of Rs. 122.45 Crore is claimed and segregated in Generation, Transmission and Distribution business. APL to provide the justification for the same.</p> <p>APL Reply: The Hon'ble Commission had allowed the financing / refinancing charges and forex loss component for the loans proportionate to regulatory loan in the previous Tariff Orders of AEML-G (now APL), since the cost incurred for the loans was for entire loan availed by AEML and not just for regulatory loan balance. However, it has been the contention of AEML that the loans raised by AEML (which were subsequently refinanced) during takeover of business from RInfra were at lower rate of interest. Since the benefit of lower interest rate was passed on to beneficiaries is a result of the exercise of refinancing the entire loan balance (of RInfra) and not a portion of the same (regulatory loan portion only), entire cost incurred for the loans should also be borne by the consumers. AEML-G (now APL) has raised this issue in its Appeals (Appeal no. 395 of 2022 against MYT Order in Case no. 298 of 2019 and Appeal no. 543 of 2023 against MTR Order in Case no. 229 of 2022) before the Hon'ble ATE and the same are pending. Accordingly, AEML-G (now APL) has claimed the entire forex loss (FERV) incurred in FY 2023-24 as per its contention in the revised Petition.</p>
5.	Para 4.12 and Table 70	<p>Interest rate on Working capital is revised to 10.50% from 10.45% thought as on 1 November, the rate was 8.95% and 9% was revised post the date of submission of Original petition. APL to justify the same.</p> <p>APL Reply: The revised Petition was filed on 02.01.2025 and the SBI MCLR as on 15th December, 2024 was revised to 9%. Hence the interest rate was taken at 10.50% in the revised Petition. In any case the same shall be considered on the basis of weighted average SBI MCLR for FY 2024-25 at the time of truing up of FY 2024-25. The Hon'ble Commission is requested to consider the interest rate at 10.50% on provisional basis for provisional truing up of FY 2024-25.</p>
6.	Para 5	<p>As per Petition, APL has submitted that AEML-D and APL have signed the PPA for the period 1 April 2025 to 31 March 2030 in terms of Hon'ble Commission's direction. APL to provide the copy of the same.</p> <p>APL Reply: Softcopy of the PPA between AEML-D and APL for the period 1 April 2025 to 31 March 2030 is enclosed as Annexure -1.</p>
7.	Table 75	<p>APL has projected PLF of more than 90% equivalent to PAF of the plant. However, it has been observed that in past 3 years, the PLF is around 75% - 80%. APL to provide the rationale for consideration of PLF above 90%.</p>

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		<p>APL Reply: The PLF of ADTPS reduces due to backing down instructions from MSLDC. As submitted in the availability certificates for FY 2022-23 and FY 2023-24, the units not generated due to backing down instructions of MSLDC was 632.37 MU for FY 2022-23 and 799.96 MU, which corresponds to PLF of 14.44% for FY 2022-23 and 18.21% for FY 2023-24. The extent to which ADTPS will be backed down can not be predicted by APL and as such it is uncontrollable. Hence APL has projected the availability of ADTPS for each year of next Control Period based on scheduled maintenance outage days and tentative unplanned outage days for each year.</p>
8.	Para 5.3.1 and 5.3.2	<p>APL has submitted that for future control period, APL has not envisaged usage of imported coal due to higher price and Washed coal due to reduction in issue of DO by SECL from road mode. Based on the same the coal projection has been made in Table 77 resulting into the quantum requirement of 35 – 36 MT of coal annually. However, the FSA with SECL is limited to ACQ of 24.52 MT. Even as mentioned by APL in the petition, for coal delivery in excess of 90% of ACQ, SECL will charge premium, its not clear whether the quantum can exceed ACQ as per FSA. Therefore, APL needs to provide the detail of procurement of shortfall quantum of around 10 to 12 MT p.a. which is beyond the ACQ of SECL</p> <p>APL Reply: Clause 4.12.4 of the FSA provides for supply of coal in excess of ACQ with mutual consent. APL shall endeavor to mitigate the shortfall by increasing materialization and procuring coal beyond ACQ under the FSA.</p>
9.	Table 79	<p>APL has provided the computation of the landed price of coal whereby the premium of 40% has levied for coal procurement above 100% from SECL. APL to provide the details of the coal price under E-Auction at present.</p> <p>APL Reply: APL has not procured e-auction coal so far for ADTPS. The availability of coal under e-auction is not certain and it also involves serious logistic issues. Therefore, e-auction coal is not an option for ensuring higher availability of the power plant to meet the requirement of Mumbai consumers.</p>
10.	Table 85	<p>APL has claimed the estimated land rent, R&M charges and S&T charges related to Railway in the O&M expense for the next Control Period. APL to provide the detail calculation of the estimated amount claimed in the petition.</p> <p>APL Reply: The detailed calculation are provided at Annexure – 2.</p>
11.	Table 91	<p>Interest rate on Working capital is revised to 10.50% from 10.45% thought as on 1 November, the rate was 8.95% and 9% was revised post the date of submission of Original petition. APL to justify the same.</p>

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		<p>APL Reply: The revised Petition was filed on 02.01.2025 and the SBI MCLR as on 15th December, 2024 was revised to 9%. Hence the interest rate was taken at 10.50% in the revised Petition. In any case the same shall be considered on the basis of weighted average SBI MCLR for each year at the time of truing up of respective years. The Hon'ble Commission is requested to consider the interest rate at 10.50% on provisional basis for ARR projections for each year of Control Period.</p>