



SOUTHERN POWER DISTRIBUTION COMPANY OF A.P. LIMITED
19-13-65/A, Vidyut Nilayam, Srinivasapuram, Tirupati (www.apspdcl.in)

From

The Executive Director,
RAC & Planning, APSPDCL,
19-13-65/A, Vidyut Nilayam,
Kesavayanagunta, Tirupati.

To

The Secretary, APERC,
11-4-660, 4th Floor,
Singareni Bhavan, Red Hills
Lakdikapul, Hyderabad-04.

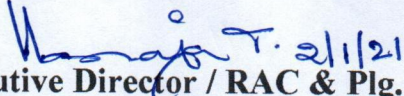
Lr No.ED/RAC&Plg./SPDCL/TPT/GM/RAC/F:True-up/D.No.01 /21 dt.02-01-2021

Sir,

Sub:- APSPDCL/Tirupati – Filing of True up petition for Retail Supply Business for FY 2019-20 – Submitted – Regarding.

The licensee submits the true up petition for Retail Supply Business for FY 2019-20 for seeking approval / orders of the Honourable Commission please.

Yours faithfully,


Executive Director / RAC & Plg.

Encl : 1) Petition in Original for FY 2019-20 (6 sets)
2) Rs.10,000 /- online payment particulars

BEFORE THE

HONOURABLE ANDHRA PRADESH ELECTRICITY REGULATORY COMMISSION

AT ITS OFFICE AT 4th FLOOR, SINGARENI BHAVAN, RED HILLS, HYDERABAD 500 004

FILING NO. _____/2021

Case NO. _____/2021

IN THE MATTER OF:

Filing of Petition for Determination of the True up for Retail Supply Business for FY 2019-20 in accordance with the “Andhra Pradesh Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff for Wheeling and Retail Sale of Electricity) Regulation No.4 of 2005 and amendments issued from time to time”.

Filed by:

SOUTHERN POWER DISTRIBUTION COMPANY OF ANDHRA PRADESH LIMITED

... Petitioner

MOST RESPECTFULLY SHOWETH THE SUMISSION:

The APSPDCL humbly submit the following:

Petition for True-up of ARR for Retail Supply Business for FY 2019-20

1 Introduction

“Terms and Conditions for determination of Tariff for Wheeling and retail supply of electricity” Regulation 4 of 2005 and First Amendment Regulation 2014 (“Regulation 1 of 2014”), lays down the principles for determination of True Up and Aggregate Revenue Requirement (ARR) for (a) Distribution Business and (b) Retail Supply Business of the Petitioners. True Up is being filed herewith this petition for FY 2017-18 that is 4th year of the 3rd Control Period.”

Sub-Clause 10.4 of the principal regulation 4 of 2005 determines the expenditure to be considered for distribution business and retail supply business. The said Clause is reproduced below:

"The expenditure of the Distribution licensee considered as "controllable" and "uncontrollable" shall be as follows:

Distribution Business	
ARR Item	"Controllable" / "Uncontrollable"
Operation & Maintenance Expenses	Controllable
Return on Capital Employed	Controllable
Depreciation	Controllable
Taxes on Income	Uncontrollable
Non-tariff Income	Controllable

In addition to the above items the retail supply business shall include the following:

Retail Supply Business	
ARR Item	"Controllable" / "Uncontrollable"
Cost of power purchase	Uncontrollable

Further, on pass-through of gains and losses on variation in "uncontrollable" items, Sub-Clause 10.5 of the principal regulation 4 of 2005 states that *"The Distribution licensee shall be eligible to claim variations in "uncontrollable" items in the ARR for the year succeeding the relevant year of the Control period depending on the availability of data as per actuals with respect to effect of uncontrollable items"*.

As per First Amendment to Principal Regulation 4 of 2005 (i.e. Regulation 1 of 2014), Sub-Clause 12.5 states that variation of power purchase cost can be claimed and also provides for its computation. The said sub-clause is mentioned below:

"a. The Distribution licensee shall include the power purchase cost variation over the previous year power purchase cost in the Tariff Order as expense (in the event of incurring excess cost) / rebate (in case of cost saving) in the ARR as special item with relevant details".

"To arrive at the power purchase cost variation, the least of the following quantity is to be considered:

- i) Actual power purchase quantity procured by the Discoms for its consumers*
- ii) Power purchase quantity computed based on actual sales except LT Agriculture sales. LT Agriculture sales will be limited to Tariff Order quantity. These aggregated sales will be grossed up with approved losses for the relevant year in the MYT Orders."*

2 Request for delay in filing the true-up petition

The Petitioner has put his best efforts in trying to file the true-up petition along with the ARR filings for FY 2021-22. However, due to delay in completion of audit the true-up petition could not be completed and the delay may please be condoned.

3 Petitioners' Filings on True-up for FY 2019-20

The current filing follows the principles laid down under above Regulations, mentioned in Section 1 above, for determination of the true-up for the retail supply business for the year FY 2019-20. Therefore, the Petitioners herewith submit the Petition providing details with regard to the deviations resulting in True-Up requirement for FY 2019-20. The petitioner has filed the true-up petition based on the statutory audit figures for FY 2019-20.

The Petitioner in the following sections have provided the following details

- a) Deviation in Source Wise Energy Despatch in FY 2019-20 with respect to the Approved Despatch as per Tariff Order FY 2019-20.
- b) Comparison of Approved Power Purchase Costs and Actual Power Purchase Costs

4 Deviation in power purchase quantum (Energy Despatch)

As part of the retail supply tariff order, the Honourable Commission approves monthly energy despatch for every year. In reality, actual monthly energy despatch happens to be different from approved energy despatch due to several factors like coal availability, transportation issues, renewable power generation, variation in DISCOM demand, agricultural load, seasonal changes, prevailing drought conditions if any, economic and commercial activities in the State, Temperature, humidity, rainfall situations etc. Plant wise, Fuel type wise approved procurement & actual purchase details are given in Annexure-I.

5 Deviation in Source wise Energy Despatch

The following table shows the difference between the approved and actual despatch from the major sources as approved by the Hon'ble Commission in the Tariff Order FY 2019-20:

Table 1 Comparison of approved and actual energy despatch

Source	Energy Despatch (MU)			
	RSTO	Actuals	Variation (Act-RSTO)	% Variation
AP Genco-Thermal	9978.89	10401.39	422.5	4.23%
APPDCL	6894.42	4369.88	-2524.54	-36.62%

Source	Energy Dispatch (MU)			
	RSTO	Actuals	Variation (Act-RSTO)	% Variation
CGS	9812.62	9655.67	-156.95	-1.60%
IPP	2892.59	4428.78	1536.19	53.11%
GAS	2133.13	1365.88	-767.25	-35.97%
Hydel	2101.92	2312.58	210.66	10.02%
NCE	10726.3	12363.02	1636.72	15.26%
SHORT TERM & Others	390.44	2486.30	2095.86	536.79%
SWAP RETURN	-2709.29	-2165.98	543.31	-20.05%
D<--->D TRANSACTION	-616.34	-4854.88	-4238.54	687.70%
Sale of Power	0.00	-17.52	-17.52357	0.00%
Total	41604.68	40345.12	-1259.563	-3.03%

It can be observed from the above Table that, even though overall deviation in power procurement is only -3.03% (Actual Dispatch being lesser than the approved quantum) with reference to the approved quantum, there are variations in Source wise procurement. Reasons for variations in procurement of energy from different sources are briefed as under.

- a) There is a shortfall to the extent of 2500 MU of generation from APPDCL Thermal Generating plant at Krishnapatnam, due to shortage of Coal.
- b) The DISCOM has procured more power from thermal IPPs to replenish the shortfall in Krishnapatnam thermal generation to meet the Demand.
- c) In tune with the non-dispatchability of NCE/RE sources, whatever energy available from these sources is procured.
- d) There is shortfall in Generation from Gas based projects due to partial availability of Gas and lesser procurement of power from CGS Stations.
- e) To meet the shortfall in energy from the committed sources and in view of operation of Merit Order Dispatch (MoD) principles for optimization of power purchase cost, an additional quantum of almost 2100 MU has been procured from Market Sources & others.
- f) There is a wide variation in D<>D energy that is settled against the additional drawal by APEPDCL in lieu of variation in DISCOM demand and generation capacity allocation ratio.
- g) Swap Power return was also reconciled and there is a less commitment to the extent of 543 MU towards that.

5.1 Deviation in Sales and power purchase from approved values

The actual sales are almost equal to the approved sales, where as actual power purchase is less than 1260 MU. The actual T&D losses were a bit more than the approved values. The reason being

procurement of market power from Exchange & Swapping route which results in imposition of Inter State Transmission Losses. The following table shows the details of the same:

Table 2: Comparison of approved and actual losses & Energy Procurement

Particulars	UoM	2019-20
Approved Sales	MU	37166.70
Approved Losses	%	10.67%
Approved Power Procurement	MU	41604.68
Actual Sales	MU	35158.60
Actual Power Purchase	MU	40345.12

Comparison of Approved Power Purchase Costs and Actual Power Purchase Costs

5.2 Fixed Costs

The Hon'ble Commission approved Rs. 4110.56 Cr. as fixed costs payable to generators for FY 2019-20. This is excluding of approved Additional Interest on Pension Bonds of Rs 566.56 Crs, included in the Power Purchase Cost of APSPDCL. This amount is additionally incurred over and above the approved pension bond interest embedded in RoCE & Allowed Depreciation in AP Genco MYT Orders. Against the said approved fixed cost amount of Rs 4110.56 Crs, the Petitioners incurred Rs.4130.13 Cr. as fixed costs, i.e. the Petitioners paid fixed costs more by a meagre amount of Rs. 19.57 Crs.

The following table shows the source wise comparison between the approved and actual fixed costs for FY 2019-20:

Table 3: Comparison of approved and actual fixed costs

Source	Fixed Cost (Rs Crs)			
	RSTO	Actuals	Variation (Act-RSTO)	% Variation
AP Genco-Thermal	1365.75	1502.19	136.44	9.99%
APPDCL	703.24	634.74	-68.50	-9.74%
CGS	1298.36	1101.76	-196.60	-15.14%
IPP	486.40	409.94	-76.46	-15.72%
GAS	187.57	85.23	-102.34	-54.56%
Hydel	363.15	396.27	33.12	9.12%
NCE	0.00	0.00	0.00	0.00%
SHORT TERM & Others	0.00	0.00	0.00	0.00%

Source	Fixed Cost (Rs Crs)			
	RSTO	Actuals	Variation (Act-RSTO)	% Variation
SWAP RETURN	-293.91	0.00	293.91	-100.00%
D<--->D TRANSACTION	0.00	0.00	0.00	0.00%
Sale of Power	0.00	0.00	0.00	0.00%
Total	4110.56	4130.13	19.57	0.48%

The reasons for variation in Fixed Costs are briefly described as below.

- In respect of Thermal Power Stations, the fixed costs are payable based on the available energy. In view of the principle of MoD operations, thermal plants are subjected to backing down to ascertain Load – Generation balance in real time.
- There is an additional incidence of Fixed Cost in respect of AP Genco Stations to the extent of Rs 136.44 Crs due to more availability.
- The Fixed Costs are paid to various sources of generation based on their availabilities.
- In respect of Swap return transactions, even though there is approval for Fixed Costs, in actual accounting the provision that was made during the accounting period for FY 2018-19 was reversed, and there is no FC incurred for this.

5.3 Variable Costs

The Hon'ble Commission approved **Rs. 2.92** per unit as the weighted average variable costs for FY 2019-20. The actual weighted average per unit variable cost is observed to be **Rs 3.42** per unit and the variation is about Rs **0.5** per unit. The variation is mainly on account of increase in Fuel & transportation cost than the level approved in the Tariff Order and purchase of power from external sources to make good the shortage of power due to unavailability of fuel to the full extent as approved in the Tariff Order. Summary of source wise/plant wise variable cost is presented as below:

Table 4: Comparison of approved and actual variable costs

Source	Variable Cost (Rs Crs)			
	RSTO	Actuals	Variation (Act-RSTO)	% Variation
AP Genco-Thermal	2728.65	3664.91	936.26	34.31%
APPDCL	1799.44	1339.56	-459.88	-25.56%
CGS	2386.10	3177.53	791.43	33.17%
IPP	684.38	1359.36	674.98	98.63%
GAS	491.25	391.42	-99.83	-20.32%

Source	Variable Cost (Rs Crs)			
	RSTO	Actuals	Variation (Act-RSTO)	% Variation
Hydel	0.00	0.00	0.00	0.00%
NCE	4925.52	5625.41	699.89	0.00%
SHORT TERM & Others	156.17	993.83	837.66	0.00%
SWAP RETURN	-795.04	-810.29	-15.25	1.92%
D<--->D TRANSACTION	-247.77	-1951.66	-1703.89	0.00%
Sale of Power	0.00	-7.31	-7.31	0.00%
Total	12128.70	13782.76	1654.06	13.64%

There is a substantial increase in Per Unit variable Cost of various Thermal Generating Stations from whom the DISCOM has procured the power. **The DISCOMs have incurred additional expenditure towards the power procurement on account of increase in coal cost and same is pass through.** The variation in Per Unit Variable Cost is presented as below:

Source	Per Unit Variable Cost (Rs/Unit)			
	RSTO	Actuals	Variation (Act-RSTO)	% Variation
AP Genco-Thermal	2.73	3.52	0.79	28.86%
APPDCL	2.61	3.07	0.46	17.45%
CGS	2.43	3.29	0.86	35.33%
IPP	2.37	3.07	0.70	29.73%
GAS	2.30	2.87	0.56	24.44%
Hydel	0.00	0.00	0.00	0.00%
NCE	4.59	4.55	-0.04	-0.91%
SHORT TERM & Others	4.00	4.00	0.00	-0.07%
SWAP RETURN	2.93	3.74	0.81	27.48%
D<--->D TRANSACTION	4.02	4.02	0.00	0.00%
Sale of Power	0.00	4.17	4.17	0.00%
Total	2.92	3.42	0.50	17.19%

- There is an overall increase of almost 17.19 % in per unit variable cost, with variation varying between 36.18% for CGS plants to 17.45% in respect of APPDCL.
- The DISCOM has procured more power from thermal IPPs to replenish the shortfall in Krishnapatnam thermal generation to meet the Demand.
- Swap return power is valued at Rs 3.74/Unit (without fixed charges) against Rs 2.93/Unit approved by the Commission.

5.4 Treatment of Market Purchases:

With regard to power procurement from the open market from Power Exchanges / Bilateral contracts, it is to submit that the DISCOMs are resorting to this source of purchase under emergency conditions only with a dire requirement to avoid load shedding and consequential inconvenience to the public. AP State Govt. has committed to provide 24X7 Uninterrupted power supply to all category of consumers under Power for All (PFA) programme implemented by Govt. of India. DISCOMs are resorting to Market purchases on distress conditions after exhausting all the available committed sources. In order to ensure reliable & uninterrupted power supply the DISCOMs, the shortfall had been met through short term purchases from market sources. The DISCOMs are making best endeavors to contain the weighted average price of the procurement within the limits of the ceiling price approved by the Commission.

If the Hon'ble Commission treats the approved price for Market purchases as only the ceiling price, and limit the expenditure incurred towards cost of market purchases and thus denying the APDISCOMs of their legitimate expenditure incurred in the interests of maintaining uninterrupted power supply to the Consumers, the DISCOM will be plunged into financial crisis. The Hon'ble APERC is earnestly requested to approve and consider the approved ceiling price of Market purchases as weighted average price of market procurement.

5.5 Summary of Total Costs

The following table shows the summary of source wise power purchase costs borne by the Petitioner during the year FY 2019-20. (The detailed station-wise comparison of Costs is shown in **Annexure-I**):

Table 5: Comparison of approved and actual power purchase costs

Source	Total Cost (Rs Crs)			
	RSTO	Actuals	Variation (Act-RSTO)	% Variation
AP Genco-Thermal	4094.40	5167.10	1072.70	26.20%
APPDCL	2502.68	1974.30	-528.38	-21.11%
CGS	3684.46	4279.29	594.83	16.14%
IPP	1170.78	1769.30	598.52	51.12%
GAS	678.82	476.65	-202.17	-29.78%
Hydel	363.15	396.27	33.12	0.00%
NCE	4925.52	5625.41	699.89	0.00%
SHORT TERM & Others	156.17	993.83	837.66	0.00%
SWAP RETURN	-1088.95	-810.29	278.66	-25.59%
D<--->D TRANSACTION	-247.77	-1951.66	-1703.89	0.00%

Source	Total Cost (Rs Crs)			
	RSTO	Actuals	Variation (Act-RSTO)	% Variation
Sale of Power	0.00	-7.31	-7.31	0.00%
Total	16239.26	17912.90	1673.64	10.31%

- a) As can be seen from the above table, there is an increase in power purchase costs for the Petitioner by Rs. 1673.64 Crs for the financial year under consideration i.e FY 2019-20.
- b) However, for the computation of true-up as per Regulation 1 of 2014 and the directions contained in the Retail Supply Tariff Order for FY 2019-20, the LT agriculture sales have to be contained at the Tariff Order approved values. The same has been carried out in the next section in order to compute the True-up for FY 2019-20.

6 True-up Computation for FY 2019-20 as per Regulations

The Petitioners have computed the true-up for FY 2019-20, as per Andhra Pradesh Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff for Wheeling and Retail Sale of Electricity) First Amendment Regulation, 2014.

As per the said regulation,

“a. The Distribution licensee shall include the power purchase cost variation over the previous year Power purchase cost in the Tariff Order as expense (in the event of incurring excess cost)/ rebate (in case of saving) in the ARR as special item with relevant details. To arrive at the power purchase cost variation, the least of the following quantity is to be considered:

- iii) *Actual power purchase quantity procured by the Discoms for its consumers*
- iv) *Power purchase quantity computed based on actual sales except LT Agriculture sales. LT Agriculture sales will be limited to Tariff Order quantity. These aggregated sales will be grossed up with approved losses for the relevant year in the MYT Orders.”*

Allowable Power Purchase Quantum for True-Up Calculations:

The Petitioners have used the above methodology to compute the allowable power purchase quantity as per the following table:

Table 6: Allowable power purchase as per True-up Regulation

Particulars	UoM	2019-20
Approved Sales	MU	37166.70
Approved Power Procurement	MU	41604.68
Actual Sales	MU	35158.60
Agricultural Sales - Approved	MU	9501.20
Agricultural Sales - Actual	MU	8938.62
Allowable Sales for True-Up	MU	35158.60
Approved Losses	%	10.67%
Revised Power Purchase	MU	39,358.11
Actual Power Purchase	MU	40,345.12
Allowable Power Purchase for True-Up	MU	39,358.11

As per the calculation submitted above, allowable power purchase quantum is 38358.11 MU against actual power purchase quantum of 40345.12 MU. For determination of true-up, the cost of reduced power purchase quantum of 987.01 MU is taken as weighted average price of market purchases and accordingly reduced from overall power purchase cost. The aggregate of the differences between the approved and actual values of fixed costs, variable costs (as computed using the allowable power purchase quantum), and other expenses gives the regulatory True-up for FY 2019-20. The following table shows the summary of the computation of True-up for the DISCOM. (The detailed station-wise comparison of Costs is shown in **Annexure-II**).

Table 7: Allowable power purchase as per True-up Regulation

Station Name	Fixed Cost (Rs. Crs.)			Variable Cost (Rs. Crs.)			Total Cost (Rs.Crs.)		
	Approved	Actuals	Diff.	Approved	Actuals	Diff.	Approved	Actuals	Diff.
Genco-Thermal	1365.75	1502.19	136.44	2728.65	3664.91	936.26	4094.40	5167.10	1072.70
APPDCL	703.24	634.74	-68.50	1799.44	1339.56	-459.88	2502.68	1974.30	-528.38
Genco Hydel	363.15	396.27	33.12	0.00	0.00	0.00	363.15	396.27	33.12
GAS	187.57	85.23	-102.34	491.25	391.43	-99.82	678.82	476.66	-202.16
CGS	1298.36	1101.76	-196.60	2386.10	3177.53	791.43	3684.46	4279.29	594.83
IPPs	486.40	409.94	-76.46	684.38	1359.36	674.98	1170.78	1769.30	598.52
NCE	0.00	0.00	0.00	4925.52	5625.40	699.88	4925.52	5625.40	699.88
SHORT TERM & Others	0.00	0.00	0.00	156.17	606.83	425.20	156.17	606.83	425.20
SWAP RETURN	-293.91	0.00	293.91	-795.04	-810.29	-15.25	-1088.95	-810.29	278.66
D<--->D TRANSACTION	0.00	0.00	0.00	-247.77	-1951.66	-1703.89	-247.77	-1951.66	-1703.89
Sale of Power	0.00	0.00	0.00	0.00	-7.31	-7.31	0.00	-7.31	-7.31
TOTAL	4110.56	4130.13	19.57	12128.70	13395.77	1267.07	16239.26	17525.91	1286.65

Thus, the required power purchase cost True-up for FY 2019-20 is Rs. 1286.65 Crs.

7. Revenue True-Up:

The Honorable Commission approves tariff and non-tariff income for the Retail Supply Business in its Retail Supply Tariff Order for every financial year. However the actual revenue realized is different from the tariff and non-tariff income approved by the Hon'ble Commission in the retail supply tariff order, due to the factors beyond the control of the licensee. If the actual revenue realized is lower than the approved revenue, the Petitioners incur losses. Hence, the Petitioners request the Hon'ble Commission to consider true-up/true-down for the revenue also.

Further, the Petitioners have written to a letter (Lr.No.CGM/Opn/SPDCL/TPT/RAC/F.Regn.4/D.No.12/16 dated 15-01-2017) to the Hon'ble Commission seeking amendment to the Regulation 4 of 2005 (seeking allowing variation of agricultural sales, allowing deviation in technical losses, allowing revenue true-up etc.)

The revenue true-up for the FY 2019-20 is shown below.

Table 8: Comparison of approved and actual Revenue & Revenue True-Up Calculations

S.No	Particulars	SPDCL
A	Approved Tariff and Non-Tariff Revenue (Without Subsidy)	17,184.00
B	Actual Tariff and Non-Tariff Revenue (Without Subsidy)	16826.38
C = A- B	Revenue True-Up	357.62

8. Total True-Up Claim:

Final true-up considering the expense true-up and revenue true-up is shown in the following table. Carrying cost for the true-up is calculated considering a working capital interest rate of 12% (which is SBI MCLR + 3.50%).

Table 9: DISCOM Wise Total True-Up Claim for FY 2019-20

Total True-up for FY 2019-20 (Rs. in Cr)		
S.No	Particulars	SPDCL
A	Expense True-up	1286.65
B	Revenue True-up / (True-down)	357.62
C	Total	1644.27
D	Carrying Cost @ 12% interest Rate (for one year)	197.31
E	Total true-up	1841.58

The Petitioners also request the Hon'ble Commission to take into consideration the carrying cost to be incurred by the licensee in the future till the complete true-up mentioned above is recovered.

As APCPDCL is granted license to carryout distribution activities in Krishna, Guntur & Prakasam districts, the above power purchase cost true-up and revenue true-up is to be distributed between the two DISCOMs in the ratio of allocation of power generation capacities as per the GO.

Total True-up for FY 2019-20 (Rs. in Cr)				
S.No	Particulars	SPDCL	CPDCL	Total
A	Expense True-up	815.86	470.78	1286.65
B	Revenue True-up / (True-down)	226.77	130.85	357.62
C	Total	1042.63	601.64	1644.27
D	Carrying Cost @ 12% interest Rate (for one year)	125.12	72.20	197.31
E	Total true-up	1167.75	673.83	1841.58

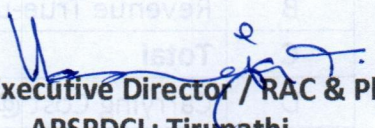
9. Prayer

The Petitioners humbly pray that the Hon'ble Commission may:

- Approve the true-up on account of Power Purchase Cost variations and revenue for the Retail Supply Business for FY 2019-20.
- To approve the total true-up required for FY 2019-20 pertaining to the Retail Supply Business of APSPDCL & APCPDCL for Rs. 1841.58 Crs.
- To pass such order as the Honorable Commission may deem fit and proper in the facts and circumstances explained above.

SOUTHERN POWER DISTRIBUTION COMPANY OF ANDHRA PRADESH LIMITED

Through


Executive Director / RAC & Plg.
APSPDCL: Tirupathi

Place: Tirupathi

Date: 02-01-2021

**BEFORE THE HONOURABLE ANDHRA PRADESH ELECTRICITY
REGULATORY COMMISSION**

At its office at 4th Floor, Singareni Bhavan, Red Hills, Hyderabad-500 004

File No. /2021

Case No. /2021

IN THE MATTER OF:

Filing of Petition for Determination of the True up for Retail Supply Business for FY 2019-20 in accordance with the "Andhra Pradesh Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff for Wheeling and Retail Sale of Electricity) Regulation No.4 of 2005 and amendments issued from time to time".

AND

IN THE MATTER OF:

SOUTHERN POWER DISTRIBUTION COMPANY OF ANDHRA PRADESH LIMITED

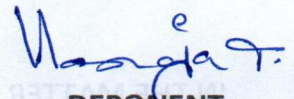
- Petitioner

Affidavit

I, Tsundururu Vanaja, D/o of Late Sri T.G. Sanjeeva Rao, aged about 58 years working for gain at the Southern Power Distribution Company of Andhra Pradesh Limited do solemnly affirm and say as follows:

- 1 I am the Executive Director / RAC & Plg. of APSPDCL, the Licensee that has been granted license, the distribution and retail supply functions in the Southern distribution zone in Andhra Pradesh vide the Honourable Commission's approval in proceedings no. APERC/Secy/Engg/No.6 dt.31.3.2000. On December 27, 2000, the Honourable Commission has awarded a Distribution and Retail Supply License to APSPDCL, to be effective from April 1, 2001. I am competent and duly authorised by APSPDCL to affirm, swear, execute and file this affidavit in the present proceedings.
- 2 As such, I submit that I have been duly authorised by the Board of Directors of APSPDCL to submit the application, true-up/true-down application for FY 2019-20 to the Honourable Commission.

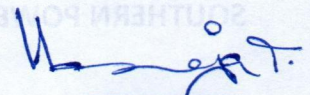
3 I submit that I have read and understood the contents of the appended application of APSPDCL. The facts stated in the application are true to the best of my knowledge, which are derived from the official records made available and certain facts stated are based on information and advice which, I believe to be true and correct.


DEPONENT

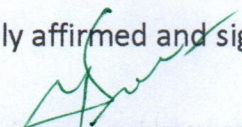
VERIFICATION:

I, the above named deponent do hereby verify & affirm the contents of this affidavit as true & correct.

Verified and attested at Tirupati on this 2nd day of January, 2021


DEPONENT

Solemnly affirmed and signed before me


**COMPANY SECRETARY
APSPDCL :: TIRUPATI.**

Annexure-I

Actual Power Purchase Cost for FY 2019-20

Generating Station	Energy (MU)			Fixed Cost (Rs. Crs.)			Variable Cost (Rs. Crs.)			Total Cost (Rs.Crs.)		
	Approved	Actuals	Diff.	Approved	Actuals	Diff.	Approved	Actuals	Diff.	Approved	Actuals	Diff.
Apgenco-Thermal												
Dr. NTPPS	5293.05	4624.49	-668.56	528.72	436.01	-92.71	1413.25	1536.66	123.41	1941.97	1972.67	30.70
Dr. NTPPS-IV	2136.28	1964.36	-171.92	226.78	216.16	-10.62	514.84	612.45	97.61	741.62	828.61	86.99
RTPP Stage-I	1070.54	800.79	-269.75	199.21	167.56	-31.65	336.15	304.69	-31.46	535.36	472.25	-63.11
RTPP Stage-II	808.67	1196.54	387.87	192.21	162.66	-29.55	253.92	456.65	202.73	446.13	619.31	173.18
RTPP Stage-III	302.58	368.34	65.76	178.38	166.36	-12.02	95.01	140.14	45.13	273.39	306.50	33.11
RTPP Stage-IV	367.77	1446.87	1079.10	40.45	353.44	312.99	115.48	614.32	498.84	155.93	967.76	811.83
APPDCL Stage-I	6894.42	4369.88	-2524.54	703.24	634.74	-68.50	1799.44	1339.56	-459.88	2502.68	1974.30	-528.38
Genco-Thermal Total	16873.31	14771.27	-2102.04	2068.99	2136.93	67.94	4528.09	5004.47	476.38	6597.08	7141.40	544.32
Srisailam RCPH	436.54	859.89	423.35	131.25	142.31	11.06	0.00	0.00	0.00	131.25	142.31	11.06
NSRCPH	75.96	66.52	-9.44	13.50	16.29	2.79	0.00	0.00	0.00	13.50	16.29	2.79
NSTPDC PH	3.94	49.60	45.66	32.65	34.27	1.62	0.00	0.00	0.00	32.65	34.27	1.62
Upper Sileru	459.21	411.02	-48.19	46.27	49.01	2.74	0.00	0.00	0.00	46.27	49.01	2.74
Lower Sileru	790.33	549.95	-240.38	88.68	93.93	5.25	0.00	0.00	0.00	88.68	93.93	5.25
Donkarayi	56.61	46.09	-10.52	4.82	5.10	0.28	0.00	0.00	0.00	4.82	5.10	0.28
PABM	1.81	0.61	-1.20	7.72	8.46	0.74	0.00	0.00	0.00	7.72	8.46	0.74
Minihydel(Chettipet)	1.82	1.44	-0.38	0.58	1.08	0.50	0.00	0.00	0.00	0.58	1.08	0.50
Machkund AP Share	210.57	223.60	13.03	22.35	27.46	5.11	0.00	0.00	0.00	22.35	27.46	5.11
TB Dam AP Share	65.13	103.86	38.73	15.33	18.36	3.03	0.00	0.00	0.00	15.33	18.36	3.03
Genco Hydel Total	2101.92	2312.58	210.66	363.15	396.27	33.12	0.00	0.00	0.00	363.15	396.27	33.12
APGENCO-TOTAL	18975.23	17083.85	-1891.38	2432.14	2533.20	101.06	4528.09	5004.47	476.38	6960.23	7537.67	577.44
APGPCL Stage-I	21.35	18.01	-3.34	1.37	1.87	0.50	5.15	6.12	0.97	6.52	7.99	1.47
APGPCL Stage-II	59.27	80.91	21.64	2.89	6.47	3.58	12.74	28.01	15.27	15.63	34.48	18.85
Godavari Gas Power Plant	661.73	412.52	-249.21	52.28	17.06	-35.22	145.58	121.72	-23.86	197.86	138.78	-59.08
Spectrum Power	620.54	356.00	-264.54	57.09	32.75	-24.34	148.31	94.37	-53.94	205.40	127.12	-78.28
LANCO Kondapalli	770.24	498.44	-271.80	73.94	27.08	-46.86	179.47	141.21	-38.26	253.41	168.29	-85.12
GAS-TOTAL	2133.13	1365.88	-767.25	187.57	85.23	-102.34	491.25	391.43	-99.82	678.82	476.66	-202.16

Generating Station	Energy (MU)			Fixed Cost (Rs. Crs.)			Variable Cost (Rs. Crs.)			Total Cost (Rs.Crs.)		
	Approved	Actuals	Diff.	Approved	Actuals	Diff.	Approved	Actuals	Diff.	Approved	Actuals	Diff.
NTPC(SR) Ramagundam I & II	1194.14	1255.35	61.21	91.77	90.72	-1.05	260.32	327.15	66.83	352.09	417.87	65.78
NTPC(SR) Simhadri Stage-I	1473.69	1915.76	442.07	203.41	272.32	68.91	394.95	660.00	265.05	598.36	932.32	333.96
NTPC(SR) Simhadri Stage-II	498.01	763.89	265.88	132.03	141.42	9.39	133.47	256.52	123.05	265.50	397.94	132.44
NTPC(SR) Talcher Stage-II	806.54	743.60	-62.94	57.40	60.38	2.98	112.11	149.62	37.51	169.51	210.00	40.49
NTPC(SR) Ramagundam III	332.17	331.56	-0.61	24.66	25.66	1.00	71.42	85.30	13.88	96.08	110.96	14.88
NTPC Kudgi Stage-I	106.24	481.90	375.66	208.50	212.51	4.01	38.03	181.40	143.37	246.53	393.91	147.38
NTECL Valluru	427.63	247.21	-180.42	76.67	111.48	34.81	94.08	95.08	1.00	170.75	206.56	35.81
NLC Stage-I	157.96	216.69	58.73	15.19	16.42	1.23	45.49	58.71	13.22	60.68	75.13	14.45
NLC Stage-II	259.37	374.78	115.41	28.32	32.20	3.88	74.70	101.67	26.97	103.02	133.87	30.85
NPC(MAPS)	86.65	39.43	-47.22	0.00	0.00	0.00	19.32	-0.47	-19.79	19.32	-0.47	-19.79
NPC(KAIGA unit I,II,III,IV)	535.40	569.81	34.41	0.00	0.00	0.00	172.40	155.86	-16.54	172.40	155.86	-16.54
NTPL(NLC TamilNadu)	583.34	425.95	-157.39	92.04	89.17	-2.87	139.42	126.11	-13.31	231.46	215.28	-16.18
NLC NNTPS	238.33	18.24	-220.09	48.00	3.29	-44.71	59.34	4.19	-55.15	107.34	7.48	-99.86
JNNSM Ph-1 Thermal	226.29	118.53	-107.76	31.68	0.00	-31.68	49.33	56.91	7.58	81.01	56.91	-24.10
JNNSM Ph-2 Thermal	2886.86	1943.33	-943.53	288.69	0.00	-288.69	721.72	840.82	119.10	1010.41	840.82	-169.59
NTPC WR&NR(Sept 2019)	0.00	209.64	209.64	0.00	46.20	46.20	0.00	78.66	78.66	0.00	124.86	124.86
CGS TOTAL	9812.62	9655.67	-156.95	1298.36	1101.76	-196.60	2386.10	3177.53	791.43	3684.46	4279.29	594.83
KSK Mahanadi	1834.83	1403.88	-430.95	294.46	216.07	-78.39	477.06	386.11	-90.95	771.52	602.18	-169.34
Thermal Powertech Corporation	1057.76	1218.10	160.34	191.94	193.88	1.94	207.32	283.05	75.73	399.26	476.93	77.67
Hinduja National Powercorp	0.00	1806.81	1806.81	0.00	0.00	0.00	0.00	690.20	690.20	0.00	690.20	690.20
SRIVATHSA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
IPP TOTAL	2892.59	4428.79	1536.20	486.40	409.94	-76.46	684.38	1359.36	674.98	1170.78	1769.30	598.52
NCE- Others	700.25	699.15	-1.10	0.00	0.00	0.00	329.38	118.61	-210.77	329.38	118.61	-210.77
NCE Wind	6051.38	6833.60	782.22	0.00	0.00	0.00	2801.79	3189.17	387.38	2801.79	3189.17	387.38
NCE Solar	3931.72	2449.88	-1481.84	0.00	0.00	0.00	1748.52	1191.00	-557.52	1748.52	1191.00	-557.52
JNNSM Ph-1 Solar	42.95	30.42	-12.53	0.00	0.00	0.00	45.83	38.10	-7.73	45.83	38.10	-7.73
JNNSM Ph-2 Solar	0.00	2349.96	2349.96	0.00	0.00	0.00	0.00	1088.53	1088.53	0.00	1088.53	1088.53
NCE TOTAL	10726.30	12363.01	1636.71	0.00	0.00	0.00	4925.52	5625.40	699.88	4925.52	5625.40	699.88
SHORT TERM PURCHASE	390.44	2469.75	2079.31	0.00	0.00	0.00	156.17	968.37	812.20	156.17	968.37	812.20
SWAP RETURN	-2709.29	-2165.98	543.31	-293.91	0.00	293.91	-795.04	-810.29	-15.25	-1088.95	-810.29	278.66
POSOCO (CGS UI charges)	0.00	16.55	16.55	0.00	0.00	0.00	0.00	25.46	25.46	0.00	25.46	25.46
SHORTTERM TOTAL	-2318.85	320.32	2639.17	-293.91	0.00	293.91	-638.87	183.54	822.41	-932.78	183.54	1116.32
D<--->D TRANSACTION	-616.34	-4854.88	-4238.54	0.00	0.00	0.00	-247.77	-1951.66	-1703.89	-247.77	-1951.66	-1703.89
Sale of Power	0.00	-17.52	-17.52	0.00	0.00	0.00	0.00	-7.31	-7.31	0.00	-7.31	-7.31
GRAND TOTAL	41604.68	40345.12	-1259.56	4110.56	4130.13	19.57	12128.70	13782.77	1654.07	16239.26	17912.90	1673.64

Annexure-II

True-up for Power Purchase Cost for FY 2019-20

Generating Station	Energy (MU)			Fixed Cost (Rs. Crs.)			Variable Cost (Rs. Crs.)			Total Cost (Rs.Crs.)		
	Approved	Actuals	Diff.	Approved	Actuals	Diff.	Approved	Actuals	Diff.	Approved	Actuals	Diff.
Apgenco-Thermal												
Dr. NTPS	5293.05	4624.49	-668.56	528.72	436.01	-92.71	1413.25	1536.66	123.41	1941.97	1972.67	30.70
Dr. NTPS-IV	2136.28	1964.36	-171.92	226.78	216.16	-10.62	514.84	612.45	97.61	741.62	828.61	86.99
RTPP Stage-I	1070.54	800.79	-269.75	199.21	167.56	-31.65	336.15	304.69	-31.46	535.36	472.25	-63.11
RTPP Stage-II	808.67	1196.54	387.87	192.21	162.66	-29.55	253.92	456.65	202.73	446.13	619.31	173.18
RTPP Stage-III	302.58	368.34	65.76	178.38	166.36	-12.02	95.01	140.14	45.13	273.39	306.50	33.11
RTPP Stage-IV	367.77	1446.87	1079.10	40.45	353.44	312.99	115.48	614.32	498.84	155.93	967.76	811.83
APPDCL Stage-I	6894.42	4369.88	-2524.54	703.24	634.74	-68.50	1799.44	1339.56	-459.88	2502.68	1974.30	-528.38
Genco-Thermal Total	16873.31	14771.27	-2102.04	2068.99	2136.93	67.94	4528.09	5004.47	476.38	6597.08	7141.40	544.32
Srisaillam RCPH	436.54	859.89	423.35	131.25	142.31	11.06	0.00	0.00	0.00	131.25	142.31	11.06
NSRCPH	75.96	66.52	-9.44	13.50	16.29	2.79	0.00	0.00	0.00	13.50	16.29	2.79
NSTPDC PH	3.94	49.60	45.66	32.65	34.27	1.62	0.00	0.00	0.00	32.65	34.27	1.62
Upper Sileru	459.21	411.02	-48.19	46.27	49.01	2.74	0.00	0.00	0.00	46.27	49.01	2.74
Lower Sileru	790.33	549.95	-240.38	88.68	93.93	5.25	0.00	0.00	0.00	88.68	93.93	5.25
Donkarayi	56.61	46.09	-10.52	4.82	5.10	0.28	0.00	0.00	0.00	4.82	5.10	0.28
PABM	1.81	0.61	-1.20	7.72	8.46	0.74	0.00	0.00	0.00	7.72	8.46	0.74
Minihydel(Chettipet)	1.82	1.44	-0.38	0.58	1.08	0.50	0.00	0.00	0.00	0.58	1.08	0.50
Machkund AP Share	210.57	223.60	13.03	22.35	27.46	5.11	0.00	0.00	0.00	22.35	27.46	5.11
TB Dam AP Share	65.13	103.86	38.73	15.33	18.36	3.03	0.00	0.00	0.00	15.33	18.36	3.03
Genco Hydel Total	2101.92	2312.58	210.66	363.15	396.27	33.12	0.00	0.00	0.00	363.15	396.27	33.12
APGENCO-TOTAL	18975.23	17083.85	-1891.38	2432.14	2533.20	101.06	4528.09	5004.47	476.38	6960.23	7537.67	577.44
APGPCL Stage-I	21.35	18.01	-3.34	1.37	1.87	0.50	5.15	6.12	0.97	6.52	7.99	1.47
APGPCL Stage-II	59.27	80.91	21.64	2.89	6.47	3.58	12.74	28.01	15.27	15.63	34.48	18.85
Godavari Gas Power Plant	661.73	412.52	-249.21	52.28	17.06	-35.22	145.58	121.72	-23.86	197.86	138.78	-59.08
Spectrum Power	620.54	356.00	-264.54	57.09	32.75	-24.34	148.31	94.37	-53.94	205.40	127.12	-78.28
LANCO Kondapalli	770.24	498.44	-271.80	73.94	27.08	-46.86	179.47	141.21	-38.26	253.41	168.29	-85.12
GAS-TOTAL	2133.13	1365.88	-767.25	187.57	85.23	-102.34	491.25	391.43	-99.82	678.82	476.66	-202.16

Generating Station	Energy (MU)			Fixed Cost (Rs. Crs.)			Variable Cost (Rs. Crs.)			Total Cost (Rs.Crs.)		
	Approved	Actuals	Diff.	Approved	Actuals	Diff.	Approved	Actuals	Diff.	Approved	Actuals	Diff.
NTPC(SR) Ramagundam I & II	1194.14	1255.35	61.21	91.77	90.72	-1.05	260.32	327.15	66.83	352.09	417.87	65.78
NTPC(SR) Simhadri Stage-I	1473.69	1915.76	442.07	203.41	272.32	68.91	394.95	660.00	265.05	598.36	932.32	333.96
NTPC(SR) Simhadri Stage-II	498.01	763.89	265.88	132.03	141.42	9.39	133.47	256.52	123.05	265.50	397.94	132.44
NTPC(SR) Talcher Stage-II	806.54	743.60	-62.94	57.40	60.38	2.98	112.11	149.62	37.51	169.51	210.00	40.49
NTPC(SR) Ramagundam III	332.17	331.56	-0.61	24.66	25.66	1.00	71.42	85.30	13.88	96.08	110.96	14.88
NTPC Kudgi Stage-I	106.24	481.90	375.66	208.50	212.51	4.01	38.03	181.40	143.37	246.53	393.91	147.38
NTECL Valluru	427.63	247.21	-180.42	76.67	111.48	34.81	94.08	95.08	1.00	170.75	206.56	35.81
NLC Stage-I	157.96	216.69	58.73	15.19	16.42	1.23	45.49	58.71	13.22	60.68	75.13	14.45
NLC Stage-II	259.37	374.78	115.41	28.32	32.20	3.88	74.70	101.67	26.97	103.02	133.87	30.85
NPC(MAPS)	86.65	39.43	-47.22	0.00	0.00	0.00	19.32	-0.47	-19.79	19.32	-0.47	-19.79
NPC(KAIGA unit I,II,III,IV)	535.40	569.81	34.41	0.00	0.00	0.00	172.40	155.86	-16.54	172.40	155.86	-16.54
NTPL(NLC TamilNadu)	583.34	425.95	-157.39	92.04	89.17	-2.87	139.42	126.11	-13.31	231.46	215.28	-16.18
NLC NNTPS	238.33	18.24	-220.09	48.00	3.29	-44.71	59.34	4.19	-55.15	107.34	7.48	-99.86
JNNSM Ph-1 Thermal	226.29	118.53	-107.76	31.68	0.00	-31.68	49.33	56.91	7.58	81.01	56.91	-24.10
JNNSM Ph-2 Thermal	2886.86	1943.33	-943.53	288.69	0.00	-288.69	721.72	840.82	119.10	1010.41	840.82	-169.59
NTPC WR&NR(Sept 2019)	0.00	209.64	209.64	0.00	46.20	46.20	0.00	78.66	78.66	0.00	124.86	124.86
CGS TOTAL	9812.62	9655.67	-156.95	1298.36	1101.76	-196.60	2386.10	3177.53	791.43	3684.46	4279.29	594.83
KSK Mahanadi	1834.83	1403.88	-430.95	294.46	216.07	-78.39	477.06	386.11	-90.95	771.52	602.18	-169.34
Thermal Powertech Corporation	1057.76	1218.10	160.34	191.94	193.88	1.94	207.32	283.05	75.73	399.26	476.93	77.67
Hinduja National Powercorp	0.00	1806.81	1806.81	0.00	0.00	0.00	0.00	690.20	690.20	0.00	690.20	690.20
SRIVATHSA	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
IPP TOTAL	2892.59	4428.79	1536.20	486.40	409.94	-76.46	684.38	1359.36	674.98	1170.78	1769.30	598.52
NCE- Others	700.25	699.15	-1.10	0.00	0.00	0.00	329.38	118.61	-210.77	329.38	118.61	-210.77
NCE Wind	6051.38	6833.60	782.22	0.00	0.00	0.00	2801.79	3189.17	387.38	2801.79	3189.17	387.38
NCE Solar	3931.72	2449.88	-1481.84	0.00	0.00	0.00	1748.52	1191.00	-557.52	1748.52	1191.00	-557.52
JNNSM Ph-1 Solar	42.95	30.42	-12.53	0.00	0.00	0.00	45.83	38.10	-7.73	45.83	38.10	-7.73
JNNSM Ph-2 Solar	0.00	2349.96	2349.96	0.00	0.00	0.00	0.00	1088.53	1088.53	0.00	1088.53	1088.53
NCE TOTAL	10726.30	12363.01	1636.71	0.00	0.00	0.00	4925.52	5625.40	699.88	4925.52	5625.40	699.88
SHORT TERM PURCHASE	390.44	1482.74	1092.30	0.00	0.00	0.00	156.17	581.37	425.20	156.17	581.37	425.20
SWAP RETURN	-2709.29	-2165.98	543.31	-293.91	0.00	293.91	-795.04	-810.29	-15.25	-1088.95	-810.29	278.66
POSOCO (CGS UI charges)	0.00	16.55	16.55	0.00	0.00	0.00	0.00	25.46	25.46	0.00	25.46	25.46
SHORTTERM TOTAL	-2318.85	-666.69	1652.16	-293.91	0.00	293.91	-638.87	-203.46	435.41	-932.78	-203.46	729.32
D<--->D TRANSACTION	-616.34	-4854.88	-4238.54	0.00	0.00	0.00	-247.77	-1951.66	-1703.89	-247.77	-1951.66	-1703.89
Sale of Power	0.00	-17.52	-17.52	0.00	0.00	0.00	0.00	-7.31	-7.31	0.00	-7.31	-7.31
GRAND TOTAL	41604.68	39358.11	-2246.57	4110.56	4130.13	19.57	12128.70	13395.77	1267.07	16239.26	17525.91	1286.65



INB Reference Number IHO1186305
Transaction Status Processed
Transaction Date 02-Jan-2021 05:31 PM IST

Debit Account Details

SBI Account Number	00000011496666473	Account Type	Savings Account
SBI Branch	PBB TIRUPATI	Amount	10,000.00

Credit Account Details

Account Number	00000033888237865	Amount (INR)	10,000.00
Purpose	Fee for TrueupFY201920 APSPDCL		