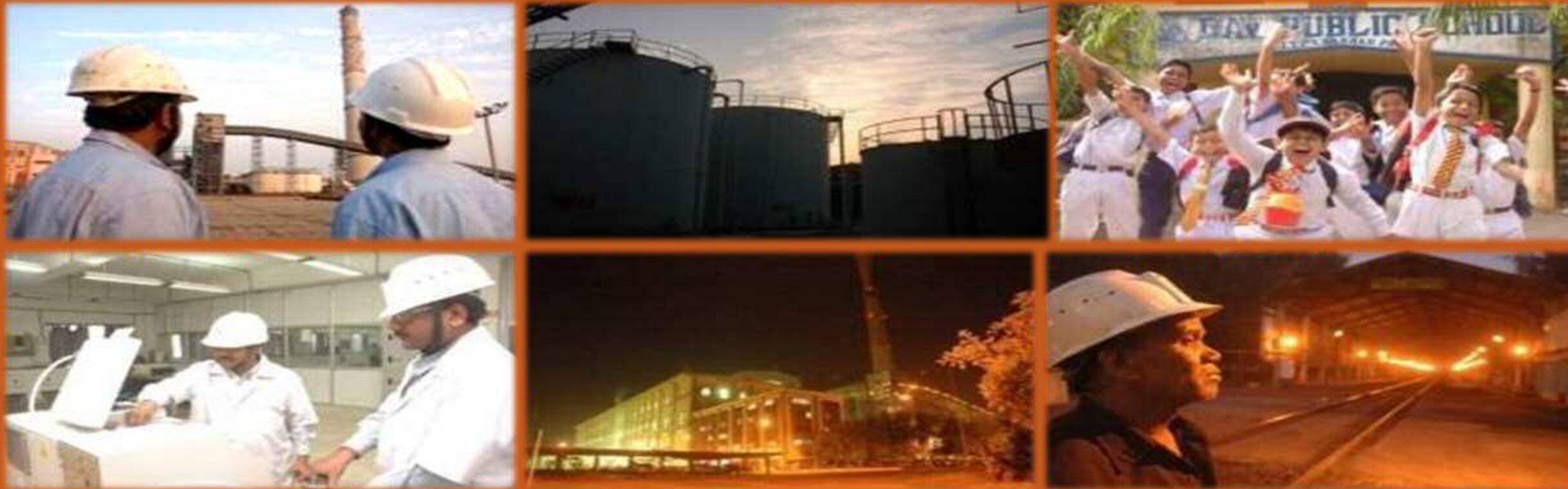


Petition for Approval of Generation Tariff of IB TPS Units 1 & 2 for FY 2024-25

Case No. 112/2023 Filed on 28.11.2023 Public Hearing: 30.01.2024



ODISHA POWER GENERATION CORPORATION LTD.
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Agenda



1. **Background**
2. **Approach for filing Tariff Petition for FY 24-25**
3. **Methodology and Computation of AFC for FY 24-25**
4. **Methodology and Computation of ECR for FY 24-25**
5. **Statutory Charges for FY 24-25**
6. **Compliance to Directives**
7. **Prayers**

1. Background ...1/3



- Hon'ble OERC vide its Order dated 27.04.2015 (Case No. 13/2002) approved the following :
 - Bulk Power Supply Agreement between OPGC and GRIDCO, dated August 13, 1996 and an agreement as Supplemental to Bulk Power Supply Agreement dated December 19, 2012.
 - Tripartite Agreement between OPGC, GRIDCO and Government of Odisha dated October 18, 1998 and an agreement as Supplemental to Tripartite Agreement dated September 6, 2012.
 - Escrow and Securitization Arrangement dated November 30, 1998 entered between OPGC, GRIDCO and Union Bank of India.
- As per the direction of Hon'ble OERC in the aforementioned Order, OPGC has been filing the Annual Tariff Petitions for Determination of Tariff of OPGC 1&2 since FY 2016-17.

1. Background ...2/3



- Hon'ble Supreme Court of India in Civil Appeal No. 9485 of 2017 on 19.04.2018 directed for determination of OPGC's Tariff in accordance with the terms of PPA. Relevant extract of the Judgment of the Hon'ble SC is reproduced below:
 - “6. *We are of the view that the Commission vide Order dated 27.04.2015 on the joint application of the parties dated 26.02.2014 rightly fixed the tariff but the view taken in subsequent order dated 21.03.2016 which has been upheld on appeal is unsustainable.*
 7. *Accordingly, we set aside the impugned order and remand the matter to the State Commission for fresh decision. The State Commission may take into account the Notification dated 21.06.2008 for the fixed costs, the PPA for the variable costs specified therein and for other costs not reflected in the PPA, statutory Regulations may be applied.*
 8. *The appeal shall stand disposed of as indicated above.*
 9. *The parties may appear before the State Commission for further proceedings on 2.07.2018.”*
- Pursuant to Supreme Court's Judgment in Civil Appeal No. 9485 of 2017, Hon'ble OERC has been issuing annual Tariff Orders since FY 2016-17.

1. Background ...3/3



Sequence of Events

28th Nov 2023	Petition Filed
16th Dec 2023	OERC sought additional Information
16th Dec 2023	Public Notice inviting objections / suggestions issued
9th Jan 2024	OPGC Submitted additional information – Filing-2
23rd Jan 2024	Publication of Notice for Public Hearing
25th Jan 2024	OPGC submitted consolidated Rejoinder to Stakeholders' Submission – Filing-3

2. Approach of Filing Tariff Petition for FY 24-25 ...1/2



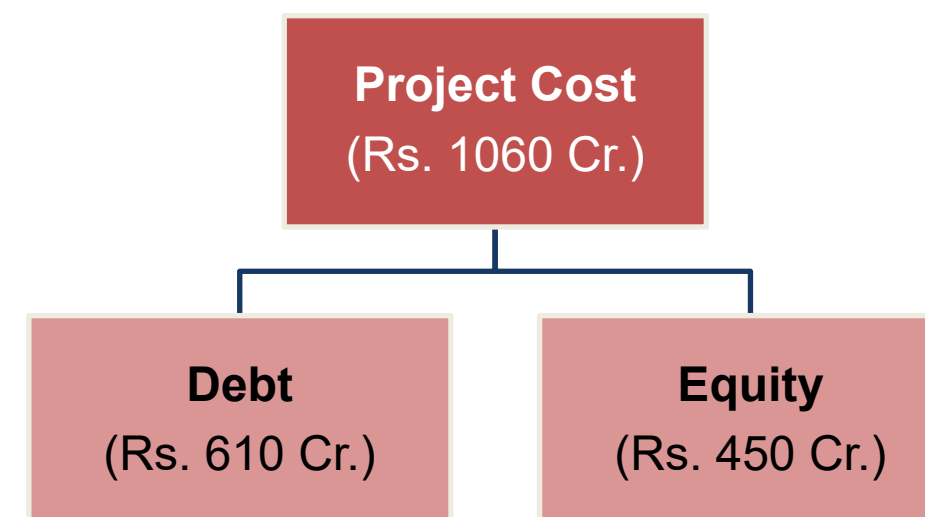
- Hon'ble Supreme Court in Judgment dated 19.04.2018 has held that the tariff norms under the PPA are to be followed in determining OPGC's tariff and for norms not covered under the PPA, the Tariff Regulations may be relied upon.
- Hon'ble OERC determines the Tariff in accordance with the Hon'ble Supreme Court Order since FY 2016-17.
- Hon'ble OERC vide its Order dated 28.10.2020 in Case No. 43 of 2017 has decided the methodology of considering GCV for computation of Energy Charge Rate (ECR). Aggrieved by this Order, Appeal No. 189/2020 has been filed before the Hon'ble APTEL.
- Hon'ble OERC vide order dated 21.05. 2021 in Case No. 54 of 2018 disallowed additional capitalisation for FY 2015-16 to FY 2018-19. Aggrieved by this Order, Appeal No. 335/2021 has been filed before Hon'ble APTEL.
- OPGC has not claimed Tariff towards additional capitalization in this Petition. Based on the outcome of the Appeal, OPGC will approach the Hon'ble OERC for approval of actual additional capitalisation and consequential tariff through a separate Petition.

2. Approach of Filing Tariff Petition for FY 24-25 ...2/2

- Tariff Petition for FY 2024-25 has been prepared in line with the approach adopted in the Tariff Petitions for previous years.
- Components of AFC, ECR and Other Charges for FY 2024-25 have been computed as per the provisions of PPA.

Project Cost and Means of Finance

Tariff components	Considering original project cost as per the Approved Amended PPA
O&M expenses	✓
Depreciation	✗
Interest on loans	✗
Interest on working capital	✓
Return on Equity	✓
Variable Charges	✓
Other Charges	✓



3. Methodology & Computation of AFC for FY 24-25 ...1/3



Particulars	Provisions of the PPA (Clause-3 of Schedule-II)	Corresponding to Original Project Cost
Depreciation	7.5% of the Capital Cost	Assets Fully depreciated. Not claimed
Return on Equity (RoE)	RoE allowable @ 16% on the equity capital of Rs. 450 Crore	RoE computed as per the PPA
Interest on Loan	As per actuals	Loan fully repaid. Not Claimed
O&M expenses	@ 2.50% of Rs. 1030 Crore for FY 1996-97 escalable @ 8% p.a. from 01.04.1996	O&M expenses computed in accordance with the PPA
Interest on working capital (IoWC)	<p>Normative working capital requirements include:</p> <ul style="list-style-type: none"> • 1.5 months coal cost; • 2 months oil cost; • O&M expenses for 1 month; • Receivables for 2 months. <p>Rate of IoWC @ rate of interest applicable to OPGC for its working capital facility</p>	<p>Normative working capital requirements computed in accordance with the PPA corresponding to Normative PLF of 68.49%;</p> <p>Actual interest rate of Working Capital applicable (8.65%) as in September 2023 considered</p>

3. Methodology & Computation of AFC for FY 24-25 ...2/3



Return on Equity

Rs. Cr.

Sl.	Particulars	Legend	FY 2024-25
1	Equity for Station	A	450.00
2	Rate of Return on Equity	B	16.00%
3	Return on Equity	C=A x B	72.00

O&M Expenses

Rs. Cr.

Sl.	Particulars	Legend	FY 2024-25
1	Capital Cost of Project considered for O&M Expenses as per Amended PPA	A	1030.00
2	O&M Expenses for first year @ 2.5% of Capital Cost	B=A × 2.5%	25.75
3	Escalation rate	C	8.00%
4	O&M Expenses	D=B × (1+C) ²⁸	222.15

Interest on Working Capital

Rs. Cr.

Sl.	Particulars	Norms	FY 2024-25
1	Cost of Coal	1.5 Months	41.91
2	Cost of Secondary Fuel Oil	2 Months	9.03
3	O&M Expenses	1 Month	18.51
4	Receivables	2 Months	116.63
5	Total Working Capital Requirement		186.09
6	Interest Rate (%)	%	8.65%
7	Interest on Working Capital		16.10

3. Methodology & Computation of AFC for FY 24-25 ...3/3



Annual Fixed Cost

Particulars	Unit	PPA Schedule-II	FY 2023-24	FY 2024-25
			Approved	Proposal
Depreciation	Rs. Crore	Clause-3(a)	-	-
Return on Equity	Rs. Crore	Clause-3(b)	72.00	72.00
Interest on Loan	Rs. Crore	Clause 8.0 (7) and (11)	-	-
O&M Expenses	Rs. Crore	Clause-3(d), 3(e)	205.69	222.15
Interest on Working Capital	Rs. Crore	Clause-3(f)	14.26	16.10
Total AFC	Rs. Crore	Clause-3	291.95	310.24

4. Methodology & Computation of ECR for FY 2024-25...1/3



- As per Hon'ble SC Judgement dated 19.04.2018, the PPA Norms shall be considered for the determination of the variable costs. Accordingly, the following has been considered for computing the base ECR for FY 2024-25.
 - Norms of Operation
 - Price and GCV of Coal and Oil as delivered to the Power Station (*Clause 7.0 (c) & (d) of Schedule II*)
 - Audited Weighted Average Prices and GCV of Coal and Oil for Current Year. (*Proviso to Clause 9 of the PPA*)
- In Case No 43/2017, Hon'ble OERC has specified the methodology of GCV of coal '**as delivered**' to the power station considering GCV measured at coal mine end (loading point) with total moisture correction.
$$= GCV \times \frac{(1 - TM)}{(1 - IM)}$$
- OPGC has filed Appeal No. 189/2020 before Hon'ble APTEL aggrieved by the Order in Case No. 43/2017.
- Pending outcome of OPGC's Appeal and without prejudice, the methodology for computation of GCV of coal as stipulated in Order in Case No 43/2017 has been considered.
- Audited weighted average prices and GCV of coal and oil for the months of April to Sept 2023 on the basis of half yearly fuel price adjustment bill have been considered.

4. Methodology & Computation of ECR for FY 2024-25...2/3



Norms of Operation for calculation of ECR

Particulars	Provisions of the PPA	Methodology adopted
Target Availability for full recovery of AFC	68.49%	Considered as per the PPA
Target PLF for incentive	80%	Considered as per the PPA
Auxiliary consumption	9.50%	Considered as per the PPA
Gross Station Heat Rate	2500 kCal/kWh	Considered as per the PPA
Specific oil consumption	3.50 ml/kWh	Considered as per the PPA

Fuel Price & GCV

Particulars	Units	Approved in OERC's Tariff Order for FY 2023-24	Considered for FY 2024-25
Fuel Prices			
Coal price	Rs./MT	1,622.39	1,664.76
LDO price	Rs./kL	80,561.66	84,867.03
HFO price	Rs./kL	61,885.46	58,863.34
Fuel GCV			
Coal	kCal/kg	3,101.00	3,084.00
LDO	kCal/ltr	10,000	10,000
HFO	kCal/ltr	10,000	10,000

4. Methodology & Computation of ECR for FY 2024-25...3/3



Particulars	Unit	FY 2023-24	FY 2024-25
		Approved	Proposal
Normative Availability	%	68.49%	68.49%
Auxiliary consumption	%	9.50%	9.50%
Station Heat Rate	kcal/kWh	2500	2500
Secondary oil consumption	ml/kWh	3.50	3.50
GCV of Coal	kcal/kg	3,101.00	3,084.00
GCV of oil	kcal/ltr	10,000.00	10,000.00
Price of Coal	Rs./MT	1,622.39	1,664.76
Price of Oil-LDO	Rs./kL	80,561.66	84,867.03
Price of Oil-HFO	Rs./kL	61,885.46	58,863.34
Variable Charges per kWh (Base Value)	Paisa/kWh	167.16	170.80

5. Statutory Charges for FY 24-25

Clause 10 of the approved Amended PPA allows reimbursement of statutory taxes, levies, duties, cess or any kind of imposition(s) whatsoever imposed/charged by any Government (Central/State) and/or any other local bodies/authorities on generation of electricity including auxiliary consumption or any other type of consumption, transmission, sale or on supply of power/ energy and/or in respect of any of its installations associated with the Generating Stations and/or on Transmission System, Environmental Protection, Water etc.

Rs. Cr.

Particulars	FY 2023-24	FY 2024-25	Basis of Claim
	Approved	Proposed	
Electricity Duty	14.57	14.83	Based on generation plan for FY 2024-25
Water Cess and Water Charges	9.22	9.81	Actual incurred for FY 2022-23
Energy Compensation Charge	-	-	Not paid for FY 2022-23
Tax and Cess on Land	0.25	1.33	Actual incurred for FY 2022-23
SOC & MOC for SLDC	0.39	0.39	Approved for FY 2023-24
ERPC Charges	0.16	0.16	Actual incurred for FY 2022-23
Annual inspection fees	0.16	0.26	Actual incurred for FY 2022-23
Income Tax	-	24.22	Tax rate of 25.17% considered
Recovery of ARR & Tariff Petition Fee and Publication Expenses	0.30	0.30	Actual Tariff Application fees + Projected Publication Expenses
Contribution towards WCF	-	-	Not paid for FY 2022-23
Ash Utilisation Expenses including Transportation Charges	-	5.00	Expected higher utilisation of Ash
Total		56.28	

6. Compliance to Directives ...1/2

1. Compliance of MoEF Notification dated 31.12.2021 for timely disposal of Ash.- In progress

2. No. of forced outages in last 5 years, reason for such outage and remedial measures taken.

Year	No. of Forced Outages
FY 23-24 (Till Sep' 23)	06
FY 22-23	19
FY 21-22	15
FY 20-21	11
FY 19-20	17

Remedial Measures:

Root Cause Analysis and Trip Analysis are being carried out and recommendations are being implemented.

Result: High Impact Outages reduced, Reliability and efficiency improved.

3. Status of Stage-III 1320 MW (2x660 MW) thermal project of OPGC

- Land, Coal & Water are available.
- Project Approval Committee (PAC) has approved the project cost
- In principle consent from GRIDCO has been received for power off take. Draft PPA shared with GRIDCO.
- Environment Appraisal Committee (EAC) of MOEF&CC has issued the ToR for Environmental Clearance.
- Consultants for EC and Pre-EPC have been appointed.

6. Compliance to Directives ...2/2

4. Preparedness to comply with CEA (Flexible Operation of Coal based Thermal generating units) Regulations 2022

- Feedback sought from CEA for similar capacity pilot project implementation.
- Scheduled for implementation in 2030 (*To comply with CEA Plan for 4th phase of implementation*).
- Discussions with the OEM/BHEL to assess the feasibility of this implementation are going on.

5. Development of Solar power in its Power plant area

- GRIDCO has accorded in-principle consent to procure 50 MW solar power subject to approval and determination of tariff by OERC
- 122nd SLSWCA has accorded in-principle Approval for setting up the 50 MW on 30.09.2023.

6. Adherence to the safety norms as per CEA Regulations

- Safety measures are being in line with CEA Regulations, 2011 and its amendments.
- SoPs are in place
- Audit and reporting mechanism is in place to monitor the safety practice being followed
- OPGC is certified as per ISO 45001:2018 and ISO 14001:2015 in compliance with the norms for '*Occupational Health & Safety Management System*'

7. Prayers

- i. Admit the instant Petition.
- ii. Approve the tariff, including annual fixed cost and base variable charges, for FY 2024-25 as claimed in the Petition.
- iii. Approve the other charges for FY 2024-25 as claimed in the Petition and recovery of other charges on actual basis during FY 2024-25.
- iv. Approve the recovery of FPA in accordance with the approved PPA during FY 2024-25.
- v. Allow OPGC to file a separate Petition regarding additional capitalisation from FY 2023-24 to FY 2024-25 after the Hon'ble APTEL pronounce Judgment in Appeal No 335/2021 filed by OPGC.
- vi. Condone any inadvertent omissions, errors, short comings and permit OPGC to add/ change/ modify/ alter this filing and make further submissions as may be required at a future date; and
- vii. Pass such other and further Orders as deemed fit and proper in the facts and circumstances of the case.

Thank You
THANK YOU

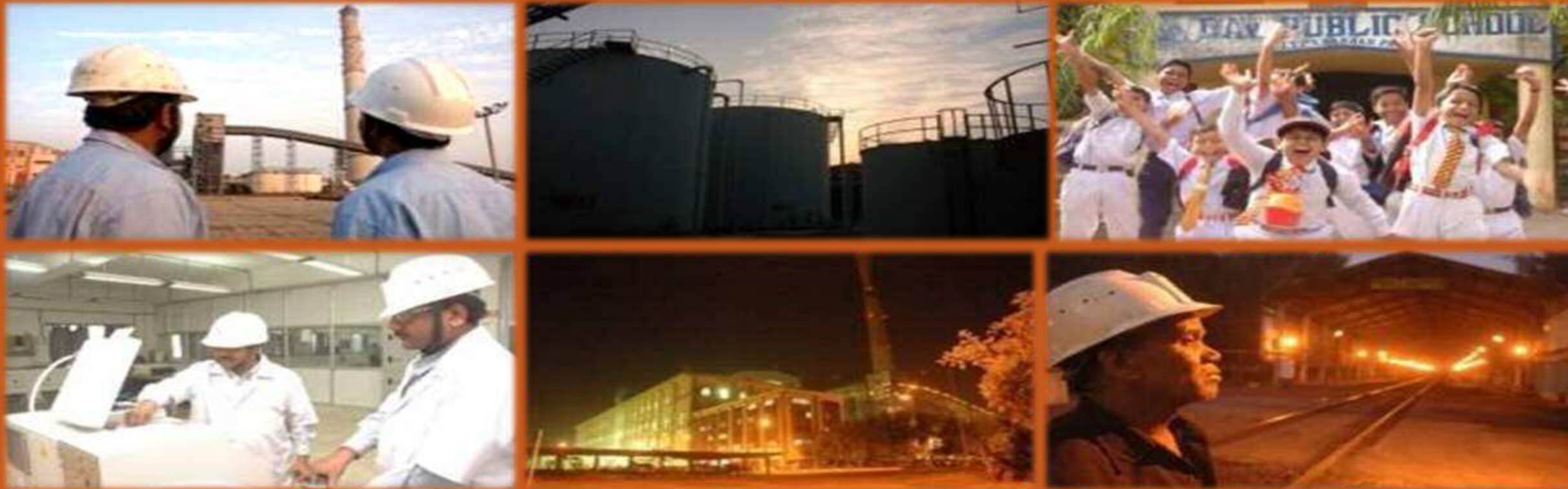


Petition for Recovery of Ash Transportation Expenses and Fly Ash Utilisation Expenses of OPGC Phase I&II for past (FY 2016-23) and future period

Case No. 99/2023

Filed on 06.10.2023

Public Hearing: 30.01.2024



ODISHA POWER GENERATION CORPORATION LTD.

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MoEF Notifications - 1/2



- **1986** : Environment Protection Act and Environment Protection Rules Notified **by Govt. of India**
- **1999 Notification:** Mechanism for utilisation of fly ash was notified by Central Govt. on 14.09.1999.
- **2003 & 2009 Amended Notification :**
 - Directives for mandatory use of ash and ash based products within 100 km of any thermal power plant
 - To building & road embankment construction agencies
 - Low-lying areas development works.
 - No mandate for sharing of transportation cost with the users of fly ash
- **2016 Notification:**
 - Mandate for sharing of Transport cost for utilization of Ash
 - Within 100 km.: **100% by the Generator**
 - Upto 300 km.: **50% by the User and 50% by the Generator**
 - Upto 300 km. for PMGSY and other Govt. Schemes: **100% by the Generator**
 - To achieve 100% utilization of fly ash before 31.12.2017.

- **2021 Notification: (Polluter Pay Principle)**

1.Utilization Targets:

- Thermal generators <60% ash utilization in FY 21-22 to achieve 100% utilization of new ash by 31.03.2027.
- At least 80% ash utilization from the third year i.e. by 31.03.2025

2.Legacy Ash Utilization: Thermal generators to achieve 100% utilization of legacy ash by 31.03.2032.

3.Change in Law Provision: Statutory obligation of 100% fly ash utilization treated as a change in law where applicable.

4.Transportation Responsibility:

- Generators to deliver fly ash free of cost to certain user agencies like construction agencies and mine operators
- Generators to bear full transportation costs.

5.Environmental Compensation (EC):

- Imposed on both thermal power plants and user agencies for non-compliance.
- User agencies' EC (per ton) is 1.5 times that of thermal generators.

6.Enforcement Jurisdiction: Central and State Pollution Control Boards

OPGC was constrained to file the present Petition due to financial implication on account of 2016 & 2021 Notifications.

Efforts for 100% Ash Utilisation



- OPGC at present has **identified many low-lying areas in periphery of ITPS** and has also applied for NOC from OSPCB to reclaim the low-lying areas with ash.
- OPGC is in the process of conducting **a feasibility study for ash transportation in rakes to Manoharpur mines** and its utilization in backfilling the mines/overburden.
- OPGC has **applied for lease of the abandoned Govt. stone quarries in Lakhanpur Tehsil** of Jharsuguda district and efforts to secure Mine Void from MCL is also in progress.
- OPGC has entered **into an agreement with VNIT, Nagpur to devise technological advancements** for enhancing ash percentage up to 90% in production of bricks and for geopolymeric use of ash in road construction.

Efforts to Sale Fly Ash in Compliance to MoEF Notifications

- EOI dated 11.09.2017 for sale of Fly Ash did not get any response from the user agencies.
- Both NIT No. ITPS/CC-22/2020-21/02 dated 19.05.2020 and NIT No. ITPS/CC-22/2020-21/04 dated 09.08.2020 for sale of Fly Ash '*as is where is*' basis with user agencies bearing the transportation cost did not get any response.
- Further, NIT No. ITPS/CC-22/2021-22/12 dated 12.10.2021 for sale of fly ash to user agencies also did not get any response.
- OPGC resorted to extending the transport subsidy to user agencies mandated to lift unutilised fly ash from thermal generators vide NIT No. ITPS/CC 22/2022 23/17 dated 18.02.2023 and NIT No. ITPS/CC-22/2023-24/07 dated 25.07.2023.
- OPGC has signed an agreement with M/s Ambuja Cement for ash transportation by railway rake for utilization in Cement Plants beyond a lead of 100 Km distance.

Provisions of PPA-1 applicable to Units-1&2

- Hon'ble Supreme Court vide its Judgment dated 19.04.2018 held that the PPA 1 terms shall prevail for determining tariff for OPGC Units 1 & 2 till 30.06.2026.

- Clause 10.0 of PPA 1: Allows OPGC to claim any statutory levies or any other kind of imposition whatsoever by any Government/ local body/ authority inter alia on account of environmental protection.

“10.0 Any statutory taxes, levies, duties, cess or any other kind of imposition whatsoever imposed/charged by any Government (State/Central) and/or any other local bodies/authorities on generation of electricity including auxiliary consumption and sale energy, environmental protection, water charges etc. shall be billed by OPGC and will be paid by the GRIDCO. However, electricity duty payable on energy drawn by OPGC, if any, shall be payable by OPGC and reimbursed by GRIDCO.

If OPGC shall have to bear any such levy or levies on account of energy supplied to the GRIDCO before the same is or are paid by the GRIDCO, the OPGC shall be entitled by way of reimbursement to recover such levy or levies from the GRIDCO.”

- Clause- 10 of Schedule-II of PPA 1:

“LEVIES. TAXES. DUTIES. CESS ETC.:

The above tariff is exclusive of any statutory taxes, levies, duties, cess or any other kind of imposition(s) whatsoever imposed/charged by any Government (Central/State) and/or any other local bodies/authorities on generation of electricity including auxiliary consumption or any other type of consumption, transmission, sale or on supply of power/energy and/or in respect of any of its installations associated with Generating Stations and/or on Transmission System, Environmental Protection, Water etc. However electricity duty payable on energy drawn by OPGC if any, shall be payable by OPGC and reimbursed by GRIDCO.”

- Expenses incurred due to compliance of MoEF Notifications is of statutory nature. GRIDCO is obliged to pay the same.

Ash Utilisation Status and Expenses Claimed for Units 1&2



Ash Utilisation Status

Year	Ash Produced (MT)	Ash Utilized (MT)	% of Ash Utilized
FY 22-23	11,50,353	4,64,849	40.41%
FY 21-22	11,64,864	4,03,200	34.61%
FY 20-21	10,96,385	7,30,990	66.67%
FY 19-20	9,39,201	6,24,595	66.50%
FY 18-19	10,14,085	3,43,411	33.86%
FY 17-18	10,96,142	6,07,344	55.41%
FY 16-17	12,37,357	4,34,725	35.13%

Expenses Incurred

Year	Ash Transported (MT)	Transport Expenses (Rs)	GST Amount (Rs)	Total Ash Transportation Cost (Rs)	Expenses other than Transportation (Rs)
A	B	C	D	E=C+D	F
FY 22-23	10,789	20,50,550	3,69,099	24,19,136	13,92,759
FY 21-22	13,394	20,09,100	3,61,638	23,70,835	15,36,705
FY 20-21	11,695	17,54,250	3,15,765	20,70,104	46,60,394
FY 19-20	18,662	27,99,300	5,03,874	33,03,617	41,24,068
FY 18-19	25,995	38,99,250	7,01,865	46,01,012	16,36,045
FY 17-18	18,014	27,02,100	4,86,378	31,88,574	8,133
FY 16-17	60,063	90,09,450	16,21,701	1,06,31,216	24,31,902
Total	1,58,612	2,42,24,000	43,60,320	2,85,84,493	1,57,90,006

Provisions of PPA-2 applicable to Units-3&4

- 2020 OERC Regulations and 2019 CERC Regulations allow **additional capital expenditure** on “change in law or compliance with any existing law”. Both these Regulations are **pari materia** in nature with respect to “Change in Law” provision.
- As the expenditure towards transportation of fly ash is of revenue nature, Hon’ble CERC has exercised its Regulatory Power u/s 79(1)(a) to allow such recurring revenue expenses as Change in Law event .
- Hon’ble CERC passed Order dated 05.11.2018 in Petition No. 172/MP/2016 wherein the 2016 Notification has been recognized as a Change in Law event and allowed recovery of fly ash transportation expense **as additional O&M charges**.
- Similarly, Hon’ble CERC passed Order dated 28.10.2022 in Petition No. 205/MP/2021 declaring 2016 & 2021 Notifications for disposal of fly ash as a Change in Law event and allowed recovery of ash transportation expense **as additional O&M charges**.
- Hon’ble OERC in Case No 78&79 of 2022 on 23.03.2023, allowed pass through of Rs 229 Cr in ARR of GRIDCO towards claim of NTPC against Ash Transport Expenses,

Ash Utilisation Status and Expenses Claimed for Units 3&4



Ash Utilisation Status

Year	Ash Produced (MT)	Ash Utilized (MT)	% of Ash Utilized
FY 22-23	28,23,724	6,57,506	23.29%
FY 21-22	24,20,650	5,78,046	23.88%
FY 20-21	21,25,576	4,84,577	22.80%
FY 19-20	12,33,724	2,13,978	17.34%

Expenses Incurred

Year	Ash Transported (MT)	Transport Expenses (Rs)	GST Amount (Rs)	Total Ash Transportation Cost (Rs)	Expenses other than Transportation (Rs)
A	B	C	D	E=C+D	F
FY 22-23	11,81,951	3,70,31,088	18,51,554	3,88,82,642	23,48,943
FY 21-22	3,52,662	7,70,28,736	38,51,437	8,08,80,173	2,41,642
Total	15,34,613	11,40,59,824	57,02,991	11,97,62,815	25,90,585

Note: In FY 19-20 and FY 20-21, fly ash from Units 3 & 4 were utilized in low lying area near to the Ash Silo. No additional cost was incurred towards ash transportation.

1. **Admit** the present Petition;
2. A **declaration** from the Hon'ble Commission that **compliance with the MoEF Notification** dated 25.01.2016 **required the Petitioner to incur** substantial expenditure in terms of **ash transportation and fly ash utilisation expenses**;
3. A **declaration** from the Hon'ble OERC that the issuance of MoEF Notifications dated 25.01.2016 is a '**Change in Law**' event requiring the Petitioner to incur substantial expenditure in terms of ash transportation subsidy and fly ash utilisation expenses;
4. A **declaration** from the Hon'ble OERC that the issuance of MoEF Notifications dated 31.12.2021 is a '**Change in Law**' event requiring the Petitioner to incur substantial expenditure in terms of ash transportation subsidy and fly ash utilisation expenses;
5. **Permit recovery of additional expenditure** on account of ash transportation and ash utilisation already incurred by the Petitioner from FY 2016-17 up to FY 2022-23, along with carrying cost;
6. Allow the Petitioner to **raise Monthly Bills for reimbursement** of the additional expenditure for ash transportation on a recurring basis for the period since April 2023 and to be incurred in the future, with annual reconciliation; and
7. Pass such further Order(s) as this Hon'ble Commission may deem fit in the facts and circumstances of the case.

Thank You
THANK YOU

