

**ODISHA ELECTRICITY REGULATORY COMMISSION
BIDYUT NIYAMAK BHAWAN
PLOT NO. 4 CHUNOKOLI, SAILASHREE VIHAR
BHUBANESWAR-751021**

**Present: Shri G. Mohapatra, Officiating Chairperson
Shri S. K. Ray Mohapatra, Member**

Case No 12/2022

In the Matter of: **Application for truing up of expenses of GRIDCO for FY 2020-21 under Section 86(1)(a) & (b) and all other applicable provisions of the Electricity Act, 2003 and under the provisions of the OERC (Conduct of Business) Regulations, 2004.**

AND

GRIDCO Ltd.	Vrs	Petitioner
M/s FACOR and Others		Respondents

For Petitioner: Shri Prashant Kumar Das, CGM (PP), Shri Lalit Mishra, GM (PP),
Ms. Madhusmita Mishra, GRIDCO Ltd.

For Respondents: Shri B.K. Das, GM (RT&C). OPTCL, Shri V. Wagle, Head Regulatory Affairs, TPCODL, Shri K.C. Nanda, GM (Fin.), TPWODL, Shri Pratap Kumar Mohanty, Sr.GM, TPNODL, Shri Binod Nayak, AGM (Comm.), TPSODL, Ms. Sonali Patnaik, ALO I/c, DoE, GoO, Shri R.P. Mahapatra and Shri Haresh Satpathy of M/s. OPGC Ltd. Nobody is present on behalf of M/s. FACOR, Shri R.C. Satpathy, NOCCI, M/s. VISA Steel Ltd., M/s. Grinity Power Tech Pvt. Ltd., M/s. Vedanta Ltd., Shri Alekha Chandra Mallick, M/s. CCPPO, Shri A.K. Sahani, and M/s. UCCI.

ORDER

Date of hearing: 19.07.2022

Date of order: 13.09.2022

1. The instant petition has been filed by GRIDCO Ltd. (hereinafter referred to as “the Petitioner”) for truing up of its expenses based on the audited final accounts for the Financial Year 2020-21.
2. The Petitioner has made the following prayers in this petition :

“1) Approve the Application of GRIDCO for Truing-up of its expenses based on the Audited Final Accounts for the FY 2020-21 of the differential Costs of Rs.1512.83 Crore for FY 2020-21 and;

- 2) Allow recovery of the revenue gap along with carrying cost through BSP of subsequent year;
 - 3) Allow the Petitioner to make further submission/addendum in support of the present application; and
 - 4) Pass any other order(s) as this Hon'ble Commission may deemed fit and proper.”
3. The facts of the case are stated as under :
- a) GRIDCO functions as the “State Designated Entity” and a deemed Intra-State Power Trader to arrange for bulk procurement of State share of power from various generators for bulk supply to four Distribution Licensees for retail supply to the consumer of the State. There is steep increase in Power Purchase cost from 278.57 p/u as approved by Commission in its Tariff order for FY 2020-21 (Power Purchase cost of Rs.8083.74 Cr for 29018.76 MU) to actual cost of 303.82 p/u (Power Purchase Cost of Rs.9659.15 Cr for 31792.74 MU).
 - b) The Commission had issued consolidated True-up order for the period from FY 2015-16 to FY 2019-20 on 22-10-2021 in Case No.67/2018, Case No.62/2020 & Case No.27/2021 respectively.
 - c) As per the provisions under Section 86(1) (a) &(b) and all other applicable provisions of the Electricity Act, 2003 read with relevant provisions of OERC (Conduct of Business) Regulations, 2004, GRIDCO has submitted the Truing-up petition for the FY 2020-21 for the approval of Commission. The Commission vide Para 130 of the Truing up order dated 22-10-2021 for FY 2015-16 to FY 2019-20 had directed GRIDCO to file the True up petition along with the Tariff Petition for FY 2022-23. GRIDCO has prayed to admit the present Truing Up petition for the FY 2020-21 which was delayed as the concerned officials of GRIDCO were indisposed due to Covid-19 & Omicron.
 - d) GRIDCO has also submitted the statement of actual audited expenses vis-a-vis the amount approved in the ARR by OERC for that year. The details of the submissions of GRIDCO are discussed in the following paragraphs:

4. **Power Purchase Cost**

The Petitioner has submitted that power purchase requirement is primarily fulfilled through multiple sources, with whom GRIDCO has long-term tied up allocated capacities through various Power Purchase Agreements (PPAs). The main sources of power procurement are broadly categorized hereunder:

- a) State Hydro Generating Station – OHPC
- b) State Thermal Generating Station – OPGC
- c) Central Hydro Generating Stations – Chukha, Tala HPS, Teesta-V, Mangdechhu
- d) Central Thermal Generating Stations – NTPC
- e) Independent Power Plants (IPPs) – Vedanta Ltd., GMR Kamalanga Ltd.
- f) Renewable Energy Generating Stations – Solar, Small Hydro, Biomass, Wind

5. The Petitioner has stated that in addition to the above sources, the Petitioner also procures power from short-term sources including power exchange through trading and also through banking, in case of shortfall from regular sources or to meet the deviation from estimated demand depending on the availability of power. GRIDCO has further stated that power procurement from different sources is undertaken by adopting Merit Order Dispatch (MOD) principle for optimal utilization of the available sources by least variable cost method. The detailed analysis of power procurement cost along with the primary reasons of deviation on actual drawal with the corresponding associated costs incurred on power procurement during FY 2020-21 are discussed below:

(a) State Hydro

The Petitioner has stated that the procurement of power from the state hydro generating sources as approved by the Commission and the actual quantum of power procurement from the same source is as follows:

Table No.1

	MU		Rs. Crore	
	Approved	Actual	Approved	Actual
State Hydro Sources including state share from Indravati & Machhkund Hydro Stations	5881.74	6277.96	529.99	576.01

The power purchase cost paid to OHPC is as per the tariff approved by the Commission in the Tariff Orders of OHPC. The Petitioner has purchased power as per Merit Order Dispatch principle. The petitioner submits that increase of power purchase cost is an uncontrollable factor and should be allowed.

(b) State Thermal

The Petitioner has submitted that the procurement of power from the state thermal generating sources (OPGC) as approved by the Commission and the actual quantum of power procurement from the same source is as follows:

Table No.2

	MU		Rs. Crore	
	Approved	Actual	Approved	Actual
Unit- I & II of OPGC	2743.56	2290.90	671.23	706.71
Unit- III& IV of OPGC	4631.78	5537.11	1431.22	1744.99
TOTAL	7375.34	7828.01	2102.45	2451.70

Table No.3

	MU		Rs. Crore	
	Approved	Actual	Approved	Actual
TTPS	3254.22	3016.62	1095.95	1039.13

The Petitioner has stated that the costs paid to OPGC are as per the Tariff Order of the Commission. Similarly cost paid to TTPS is as per Tariff Order of CERC. The Petitioner has purchased power as per Merit Order Dispatch principle. The petitioner submits that increase in power purchase cost is an uncontrollable factor and request to approve the same is as per actual audited accounts.

(c) Central Hydro

The drawal of power from central hydro power station and payment made to them are depicted below:

Table No.4

	MU		Rs. Crore	
	Approved	Actual	Approved	Actual
Central Hydro Power Stations	1170.28	1374.06	330.45	388.61

GRIDCO has submitted that it has incurred additional cost of Rs.58.16 Crore for payment to Central Hydro plants during FY 2020-21 with additional drawal of 203.78 MU with average rate of 282.82P/U. The tariff for the trans-boundary power stations has been determined by CERC in consultation with CEA and Ministry of

External Affairs, therefore, should be allowed by the Commission. The Commission has also allowed GRIDCO to draw power from the above stations.

(d) Central Thermal Generating Stations

The procurement of power from the central thermal generating sources as approved by the Commission and the actual quantum of power procurement from the same source is summarized below:

Table No.5

	MU		Rs. Crore	
	Approved	Actual	Approved	Actual
Central Thermal Power Stations	2869.53	6356.50	927.78	2456.40

The Petitioner has stated that GRIDCO had scheduled the required energy within the limit approved by the Commission. The price paid towards power procurement is as per the rate approved by the CERC. Therefore, the Petitioner has requested the Commission to approve power purchase cost as per the audited accounts.

(e) IPPs

The procurement of power from the IPPs as approved by the Commission and the actual quantum of power procurement from the same sources by GRIDCO is summarized below:

Table No.6

	MU		Rs. Crore	
	Approved	Actual	Approved	Actual
M/s. Vedanta Ltd.	3053.00	2806.01	767.18	653.48
M/s GMR Kamalanga Ltd.	2167.28	1775.16	668.51	626.12
M/s Jindal India Thermal Power Ltd.	1010.57	0.00	166.93	0.00
TOTAL	6230.85	4581.17	1602.62	1279.60

The Petitioner has requested the Commission for approving of power procurement from the IPP at actual costs for FY 2020-21. It is submitted that OERC has approved 6230.85 MU of Power at the cost of Rs.1602.62 Crore from three IPPs considering the entitlement of State Share of Power as per the Power Supply Agreement executed between the respective IPPs and the State Govt. of Odisha. The Petitioner has stated that there has been distortion in the actual drawal of power by GRIDCO due to non-supply of power by IPPs deviating from BSP order of the Commission. There has been no supply of power by M/s. JITPL during FY 2020-21 against the approval of

1010.57 MU by the Commission in the BSP order. The Petitioner has brought to the notice of the Commission that average drawal from the IPPs in the preceding five years has been only 3533.68 MU which is far less than approval of the Commission. The IPPs are taking alibi of pending cases in high Court and deficit in coal supply from MCL. The Petitioner has further stated that due to this less injection of power by IPPs they are forced to procure power from costlier sources to meet the State demand. Therefore, the Petitioner requests the Commission to approve power purchase from other alternative sources of power at relatively higher cost to compensate non availability of cheaper/low-cost power from IPPs.

(f) Force Scheduled Situations

The Petitioner has submitted that the Commission has not approved any power from FSTPS-I, II & III and KhSTPS-I&II for FY 2020-21 due to higher variable cost of power of these stations and availability of low-cost power from other sources (including IPPs) to meet the state demand. However, in spite of non-scheduling of power by GRIDCO in the normal course, there was forced scheduling from these stations by RLDC for running these high-cost plants at technical minimum which were beyond the control of GRIDCO. As these events are uncontrollable, the total costs incurred towards power procurement from all NTPC stations may be approved.

The Petitioner has submitted that the Commission in the Tariff Order for FY 2019-20 though had allowed the Fixed Cost of FSTPS III, KhSTPS I but had not approved any energy drawal from those stations. Petitioner submits that it had consistently followed MoD principles in scheduling power from these sources and was compelled to source from this station due to non-supply of approved quantum of Power by the defaulting IPPs. It is also submitted that the Commission may approve the actual power purchase cost of these plants.

The Petitioner has submitted that fixed cost is a sunk cost for GRIDCO, which is paid even if it does not source power from FSTPS and KhTPS as per the terms of PPA. The Commission in its previous tariff orders has approved fixed cost from these stations despite nil drawal from these stations.

Further GRIDCO submits that in the judgment of Hon'ble APTEL in Appeal No. 255 of 2014 in the matter of Damodar Valley Corporation-Versus-Jharkhand State Electricity Regulatory Commission, regarding disallowance of Power purchase cost,

Hon'ble APTEL held that fixed charges need to be paid and approved even if power is not scheduled. Accordingly, the Commission is requested to approve the total cost of FSTPS and KhTPS in light of the decision of Hon'ble APTEL.

(g) Renewable Sources

The submission of the Petitioner with regard to procurement of power from renewable sources as approved by the Commission and the actual quantum of power procurement from the same source is summarised below:

Table No.7

	MU		Rs. Crore	
	Approved	Actual	Approved	Actual
Renewable Sources	2236.80	1623.77	865.95	684.62

The Petitioner has requested to approve the total cost of renewable power comprising small hydro, biomass energy, wind energy, solar energy which is being scheduled to meet peak demand of the state. The total power purchase cost approved by the Commission and actual audited figures of the same is depicted below:

Table No.8
Power Purchase Cost for FY 2020-21 (MU & Rs. Cr.)

Generators	Approved in Tariff Order for FY 2020-21			Actuals/Audited of GRIDCO		
	Energy	Rate	Total cost	Energy	Rate	Total cost
	MU	P/U	Rs. Cr.	MU	P/U	Rs. Cr.
State Hydro (Old)	3676.86	91.00	334.59	4265.88	80.32	343.40
Indravati	1942.38	92.14	178.97	1713.10	100.01	171.37
Machhkund	262.50	62.58	16.43	298.97	62.58	17.91
Reimbursement of Income Tax for 2019-20	-	-	-	-	-	42.90
ARR Application, Publication Expenses	-	-	-	-	-	0.42
Total State Hydro	5881.74	90.11	529.99	6277.96	91.75	576.01
OPGC 1 & 2 nd Unit	2743.56	244.66	671.23	2290.90	308.49	706.71
OPGC 3 & 4 th Units	4631.78	309.00	1431.22	5537.11	315.15	1744.99
TTPS (NTPC)	3254.22	336.78	1095.95	3016.62	344.47	1039.13
IPPs	6230.85	257.21	1602.62	4581.17	279.32	1279.60
Renewable Sources						
Small Hydro	385.00	381.43	146.85	343.35	382.42	131.30
Biomass	80.00	578.00	46.24	47.07	945.72	44.52
Wind	752.80	287.08	216.11	475.80	284.81	135.51
Solar	1019.00	448.24	456.75	757.55	492.75	373.29
Total RE	2236.80	387.14	865.95	1623.77	421.62	684.62
Total Infirm Power	-	-	-	535.23		-

Generators	Approved in Tariff Order for FY 2020-21			Actuals/Audited of GRIDCO		
	Energy	Rate	Total cost	Energy	Rate	Total cost
	MU	P/U	Rs. Cr.	MU	P/U	Rs. Cr.
TOTAL STATE	24978.95	248.09	6196.97	23862.76	252.74	6031.06
CHUKHA	259.48	246.07	63.85	315.27	240.16	75.72
Tala HPS	130.80	221.31	28.95	144.14	216.00	31.13
Teesta-V	510.00	238.70	121.74	564.59	239.26	135.08
Mangdechhu	270.00	429.30	115.91	350.06	419.00	146.67
Total Central Hydro	1170.28	282.37	330.45	1374.06	282.82	388.61
TSTPS St-I	1509.01	312.90	539.93	1335.15	371.46	495.95
TSTPS St-II	1360.52	282.75	387.85	1001.24	288.47	288.83
FSTPS I & II	0.00		0.00	618.29	586.81	362.82
FSTPS III	-		0.00	286.21	656.66	187.95
KhTPS St-I	-		0.00	355.70	466.20	165.83
KhTPS St-II	0.00		0.00	105.55	362.51	38.26
DSTPS-I				2618.92	330.18	864.72
Barh-II	-	-		-		2.09
RRAS (NTPC)	-	-	-	-		-17.10
Kanti Bijlee Utpadan Nigam	-	-	-	35.42	1893.06	67.06
NVVNL Bundled Power (thermal)				69.14	455.86	31.52
Total Central Thermal	2869.53	323.32	927.78	6425.64	387.19	2487.92
Banking of Power						
Procurement through Exchange				111.10	386.31	42.92
Deviation payable-EREB				19.17	810.58	15.54
Total Central Sector	4039.81	311.46	1258.22	7929.98	370.11	2934.99
PGCIL Tr Charge			625.40			690.34
ERLDC Charges			3.15			1.80
OA charges						0.95
TOTAL GRIDCO	29018.76	278.57	8083.74	31792.74	303.82	9659.15

N.B. : Total power purchase cost of Rs.9659.15 Crore incurred during FY 2020-21 has been considered at Rs.9498.31 Crore in the books of accounts after adjustment of rebate (Rs 160.84 Cr)availed from the Generators.

6. Finance, A&G and other related costs

The Petitioner has submitted that GRIDCO has incurred Finance, A&G and other related costs under different components during the FY 2020-21 which are depicted below:

(a) Employee Cost

The Petitioner has submitted that GRIDCO has incurred Employee Cost to the tune of Rs.9.80 Crore against the approved cost of Rs.10.28 Crore for FY 2020-21. The

Petitioner requests that the Commission to approve the employee cost as per audited accounts.

(b) Repairs & Maintenance Cost

The Petitioner has submitted that GRIDCO has incurred expenses to the tune of Rs.0.76 Crore against approval of Rs.0.25 Crore accorded by the Commission. The Petitioner requests the Commission to approve Repairs & Maintenance cost as per the audited accounts.

(c) Administration and General Expenses Cost

The Petitioner has submitted that GRIDCO has incurred A&G expenses to the tune of Rs.6.20 Crore against Rs.5.26 Crore approved by the Commission. The increase in costs is on account of increase in Legal Charges relating to cases filed before various forums and other expenses incurred during the year. The details of A&G Costs for FY 2020-21 and FY 2019-20 is shown below:

Table No.9

Particulars	Year ended 31.03.2021	Year ended 31.03.2020
Rent, Rates & Taxes	0.05	0.07
Licence Fees	1.90	1.90
Audit Fees	0.13	0.14
Legal Charges	1.71	1.52
Professional Fees	0.09	0.73
Communication Expenses	0.05	0.05
Vehicle running Expense	0.61	0.45
Miscellaneous Expenses	1.66	2.08
Total other expenses	6.20	6.95

The Petitioner requests the Commission to allow the Administration & General Expenses as per audited accounts.

(d) Finance Cost

The finance costs incurred by the Petitioner for FY 2020-21 is shown below:

Table No.10

Particulars	Cost (Rs. Cr)
Interest on Loans	466.05
Interest on Bonds and Debentures	95.59
Guarantee Fees	31.71
Bank Charges	1.75
Sub Total	595.1
Fair Value Changes for Loan (As per IND AS Provision)	5.25
Fair Value Changes for Bonds and Debentures	0.23
Total	600.58

The Petitioner has submitted that the Commission allowed Rs.84.07 Crore in the ARR for FY 2020-21 towards finance cost. The actual audited figures for finance Cost of GRIDCO for FY 2020-21 is Rs.600.58 Crore which the Petitioner requests the Commission for truing up based on actuals as per the Audited accounts for the FY 2020-21.

The Petitioner has stated that the revenue gap created due to gap between the procurement costs and sale of power, Payment obligations of principal and interest on borrowings and revenue gap allowed by the Commission in the tariff order, are the primary reasons for resorting to borrowings by GRIDCO from financial institutions. Bank borrowings have become instrumental, as the only recourse to meet the contractual obligation of paying the Generators' dues by the scheduled date to avoid power regulation and to avail rebate through SOD account and other short- and long-term loans from Banks. Borrowing of working capital from banks on the one hand helps in earning rebates from Generators by making timely payment of dues and on the other hand reduces high-cost Late Payment Surcharge applicable on delay in payment, thus reducing the cost for DISCOMS and ultimately benefiting the end consumers.

The Petitioner has submitted that GRIDCO has endeavored regularly for collecting arrears from DISCOMS even though the arrear have been accumulated over the years. GRIDCO was compelled to extend Escrow relaxation to DISCOMs to meet their Salary, Repair & Maintenance and other expenses as approved by the Commission in order to manage steady power supply in the state. Thus, there was no mechanism available with GRIDCO to recover its dues from the DISCOMs.

(e) Principal Repayment of Loans

The Petitioner has submitted that in spite of severe financial crunch over the years as well as without any reserves and surplus to finance the revenue shortfall over last couple of years, GRIDCO has been able to maintain steady power supply in the state by resorting to availing finance from Banks. Further, it is submitted that GRIDCO had made repayment of Rs.467.62Crore towards principal of loan during the FY 2020-21.

GRIDCO has stated that the Commission vide Para-329 of the BSP Order for FY 2020-21 observed that proposed Repayment of loan Principal during FY 2020-21

may be met from “Separate Fund” to be created out of the revenue earned from Trading of surplus Power, funds earned through sale of low-cost hydro power over and above design energy of OHPC Hydro Stations, earnings from UI/ DSM Charges and Budgetary Support from Government of Odisha.

However, the above observation of the Commission could not be materialized due to the following reasons:

- Baring few instances of unforeseen spike in the trading prices, earning of any surplus Revenue from Power Trading has not been up to the mark because of the very low prices prevalent in the Power Market which has been the case for last couple of years. Even after taking the Trading Revenue into account, GRIDCO could manage to earn very nominal revenue, by trading at rate, above the variable cost as reflected in its books of accounts.
- Unscheduled Interchange (UI) mechanism is essentially a disciplinary instrument, but not a commercial device to earn any additional revenue. Therefore, assumption of UI charges by the Commission as a source of earning revenue may not be feasible. Besides, the disciplined behavior of Grid Constituents, of late, has led to drying up of receipt of incentives in this front.
- It is respectfully submitted that Government of Odisha has so far not provided any Budgetary Support/Subsidy/Grant to GRIDCO except providing Government Guarantee to facilitate GRIDCO to avail loan from Banks/Financial Institutions at the competitive MCLR rate, reset over the years, in order to optimize the finance costs. Keeping in line with this trend, GRIDCO couldn't get any budgetary support from the State Government during FY 2020-21.
- Revenue generated during the FY 2020-21 from sale of excess energy over the design energy of OHPC Stations and the net trading surplus for principal repayment obligations are tabulated below:

Table No.11
Sale of Power & Trading of Power

Particulars	Units
1.Sale of Power over Design Energy of OHPC Stations :	
Actual Energy drawal of all Stations during FY 2020-21	6277.96 MU
Design Energy of all Stations	5619.24 MU

Particulars	Units
Surplus Energy	658.72 MU
Potential Revenue@ 195.95P/U(Approved Avg. Sales Price 287.70 P/U, Less : Avg. cost of OHPC Stations i.e., 91.75 P/U	Rs.129.07 Crore
2.Trading of Surplus Power	
Actual Energy sold through Trading during FY 2020-21	5856.99 MU
Avg. Selling Price earned through Trading during FY 2020-21	279.36 P/U
Avg. Cost of Procurement of Power during FY 2020-21	303.82 P/U
Excess of Avg. Cost Price over Avg. Selling Price	(-) 24.46 P/U
Potential Revenue on Trading	(-) Rs.143.26 Cr.
Total Potential Revenue/(Deficit) (1+2)	(-)Rs.14.19Cr.

From the above analysis, it transpires that the potential revenue from sale of excess energy over the design energy of OHPC Stations and the net trading deficit is Rs.14.19 Crore. However, this was offset by the differential costs due to non-supply by defaulting IPPs. In such a situation, GRIDCO was not able to generate the potential excess net revenue of Rs.272.33 Crore to meet the principal repayment obligations loan of Rs.467.62 Crore for the FY 2020-21.

The petitioner has considered the trading revenue in the statement of Profit & Loss for the year ended on 31.03.2021, reflecting the net loss before tax and extra ordinary items to the tune of Rs.1512.83Crore (as per Standalone Financial Statement). Under the above compelling and financial distressed situations for a prolonged period, GRIDCO continued to absorb the major deficits of the sector as whole without maintaining any reserves and surplus to meet its financial obligations and its business objectives of being the State Designated Entity to supply power. GRIDCO earnestly submits for allowing the actual repayment of loan to the tune of Rs.467.62Crore against the earlier proposal of Rs.1111.74 Crore for FY 2020-21.Summary of the Expenses approved by the Commission (Table 67 of the ARR & BSP order for FY 2020-21) vis-a-vis the actual expenses duly audited for the FY 2020-21 are submitted below:

Table No.12

Expenditure	OERC Approval	True-Up Petition	Difference (Approval - True Up) (Rs. Cr.)
Cost of Power Purchase	8083.74	9498.31	-1414.57
Employee Costs	10.28	9.80	0.48
Repair & Maintenance	0.25	0.76	-0.51

Expenditure	OERC Approval	True-Up Petition	Difference (Approval - True Up) (Rs. Cr.)
Administrative & General Expenses	5.26	6.20	-0.94
Interest chargeable to Revenue	84.07	600.58	-516.51
Depreciation	1.03	0.88	0.15
Bad Debts (FY 2020-21)	0	0.96	-0.96
Total Expenditure	8184.63	10117.49	-1932.86
Pass Through of Power Purchase Dues	132.05	-	132.05
Total Cost	8316.68	10117.49	-1800.81
Revenue : Sale of Power to DISCOM	7848.19	6797.81	-1050.38
Trading	90.59	1636.23	+1545.64
UI/DSM	-	57.82	+ 57.82
Other Income	42.30	112.56	+ 70.26
Adj. in Statement of Profit & Loss towards Changes in Fair Value of Bonds during FY 2020-21	-	0.23	+ 0.23
Receipt from CPSU under MOP	85.00	0.00	- 85.00
Total Revenue	8066.08	8604.66	+ 538.58
GAP allowed by OERC /Difference in Cost and Revenue (Loss as per Audited Annual Accounts)	-250.60	-1512.83	- 1262.23

(f) Carrying Cost

The Petitioner has requested the Commission to allow carrying costs on the regulatory gap being created due to the deficit created over the years. The Petitioner intends to appeal before Hon'ble APTEL on this matter. Therefore, the Petitioner for purpose of preparation of instant Petition has not considered previous year revenue gaps in interest of the stakeholders to understand the Petition.

GRIDCO prays the Commission to approve and allow recovery of Truing-up Gap along with carrying cost for the FY 2020-21 so that GRIDCO does not suffer revenue shortfall in discharging its duty for ensuring uninterrupted power supply to the four DISCOM Utilities.

7. The submissions by TPCODL are as follows:

- (a) There is a delay in filling of true-up petition for FY 2020-21 and GRIDCO has acknowledged it. The Commission may decide on the admission of Petition considering reasons cited by the Petitioner.

- (b) GRIDCO has sought true up amounting to Rs.1512.83 Cr., which , if allowed by the Commission would translate to an average BSP increase of Rs.0.51 per unit from Rs.3.123/Unit as per GRIDCO's tariff order for FY 23 as well as a RST impact of Rs 0.68/Unit.
- (c) The new DISCOMs were vested with the Odisha utilities through a process under Section 21 of the Electricity Act 2003 and has submitted that true up liability for the period prior to the DISCOM's effective dates of vesting should not be passed on to the DISCOMs and its consumers.
- (d) GRIDCO in its petition has mentioned that despite no power having been approved by the Commission from FSTPS-I, II & III and KhSTPS due to high variable cost of power and availability of low-cost power from other sources to meet the State's demand, there was forced scheduling from these stations by RLDC for running these high cost plants at technical minimum PLF, which was beyond the control of GRIDCO. These PPAs entered by GRIDCO have not been approved by the Commission and GRIDCO has filed petition for approval of these PPAs for FSTPS-I &II, FSTPS stage III and KhSTPS stage II and KhSTPS-1 which is presently under consideration of the Commission. In the event of approval of the PPAs, no impact of recovery of past fixed costs that have been disallowed till the approval of PPAs (at-least FY 22) be passed on to the DISCOMs in view of the Section 21 of the Electricity Act, 2003 stipulating transfer of utilities, free of past liabilities and as clarified by the Commission in the vesting order of respective DISCOMs and that the treatment of past period should be done by the Commission in a manner that it would not cause financial gain or loss to the DISCOMs .
- (e) GRIDCO has entered into PPAs aggregating to around 17,000 MW as on 03.3.2020 for meeting current and future demand of the DISCOMs and the details are as follows;

<i>Sl. No.</i>	<i>Category</i>	<i>Capacity (MW)</i>	<i>Odisha share (MW)</i>
<i>1</i>	<i>IPP</i>	<i>32090</i>	<i>5736</i>
<i>2</i>	<i>Thermal</i>	<i>19590</i>	<i>8429</i>
<i>3</i>	<i>Hydro</i>	<i>4709.5</i>	<i>2342</i>
<i>4</i>	<i>Renewable</i>		<i>639</i>
	<i>Total</i>		<i>17145</i>

Considering the fixed cost implications of these tied up capacities, the Commission may direct GRIDCO to formulate a comprehensive power procurement strategy up to the year 2030 including revision/exit from certain PPAs.

- (f) GRIDCO has submitted that against an approval of 6230.85 MU to be supplied by IPPs, the supply was only to the extent of 4581.17 MU leaving a gap of around 1650 MUs which is required to be met by additional higher cost sources. The sources from which this gap was met is not clear and request the Commission for a prudence check to ensure that this gap was met through the cheapest possible power sources, including short term contracts/power exchanges etc.
- (g) Odisha DISCOMs should not be burdened with any finance costs, the principles for allowance of which, have been denied by the Commission in the past and only those costs, which have been allowed in BSP order, should be allowed to be trued up.

8. **The submissions by TPWODL are summarised as follows:**

- (a) GRIDCO in its true up petition for FY 2020-21 has requested for approval of negative gap of Rs.1512.83 Cr. whereas the approved gap for the same period by the Commission was Rs.250.80 Cr. The major difference is mainly under the head of power purchase cost and interest on loans.
- (b) The actual power purchase cost of GRIDCO for FY 2020-21 is higher than the approved figures of ARR and GRIDCO has sourced more power with higher cost rather than the approved source with cheaper rates.

9. **The submissions of TPNODL and TPSODL are similar to the stand taken by the TPWODL and there appears no necessity to reiterate the same.**

10. **The submissions by Shri R.P. Mahapatra are as follows:**

- (a) Present application for truing up should have been filed in November, 2021 and the BSP of GRIDCO for the FY 2022-23 would have also included any truing up expenses allowed by the Commission. Shri Mahapatra has further stated that approving any truing up cost now will be infructuous as it cannot be recovered through BSP approved by the Commission for the FY 2022-23

and therefore, this present petition of GRIDCO may be heard along with Tariff Petition for the FY 2023-24.

- (b) The Commission had approved the drawl of power from the State and Central generating stations for the FY 2020-21 based on least cost power purchase principle. No power was permitted to be scheduled from the Central thermal generating stations (FSTPS-I&II, FSTPS-III, KhTPS-I & KhTPS-II) whose tariff does not come under the 'Merit Order'. The total actual energy drawn from the Central sector thermal generating stations, which were not approved by the Commission in the tariff order, is 4089.23 MU at a cost of Rs.1718.16 Cr. The average rate works out to 420.17 p/u as against the Commission's approved average power purchase cost from Central sector thermal generating stations of Rs.323.32 p/u.
- (c) The petitioner was not short of power requirement during the FY 2020-21, in fact the petitioner has sold 5856.99 MU through trading during the FY 2020-21 at an average selling price of 279.36 p/u as against of 420.17 p/u for power drawl from Central sector thermal generating stations.

11. In response to objections/observations/contentions of Respondents, submissions of the Petitioner are concisely stated as follows:

- (a) Regarding the increase in average BSP resulting in increase in RST, which may arise due to the differential amount claimed by the Petitioner in its True-Up Petition, if allowed, it is stated that as per Regulation 4.6 of the Odisha Electricity Regulatory Commission (Terms and Conditions for Determination of Wheeling Tariff and Retail Supply Tariff) Regulations, 2014 enlists power purchase cost and fuel costs as uncontrollable costs. Therefore, any variation in the approved power purchase cost and actual power purchase cost needs to be allowed as per the prevailing Regulations. Further, Section 61 of the Electricity Act, 2003 provides that the Commission shall safeguard the consumers' interest and at the same time, allow for recovery of the cost of electricity in a reasonable manner. In view of the same, the Commission is requested to True-Up the Annual Revenue Requirement for FY 2020-21 based on audited accounts and to allow recovery of excess power purchase cost.

There is no other mechanism to recover GRIDCO's past dues from the consumers who were the ultimate beneficiaries and the spirit of the true up exercise is to recover the uncontrollable cost incurred against the cost approved by the State Commission in a reasonable manner. Further the Respondent has misinterpreted the provisions of the Vesting Orders and the argument provided regarding passing of liabilities to the DISCOMs is devoid of merit and is liable to be rejected. In view of the above, the Commission is requested to kindly approve the True-Up gap claimed in the Petition.

- (b) Regarding MoD principles the following is submitted :
- The Power purchase cost calculated on merit order basis including the variable charges of the generating stations with whom GRIDCO has contractual obligation for availing State share of power is submitted to the Commission during performance review meeting.
 - GRIDCO along with SLDC is in continuous endeavor for ensuring the implementation of MOD round the clock considering the availability of power from the approved station on real time basis.
- (c) The contention of the Respondent regarding forced schedule situation, it is submitted that the Petitioner had tied up capacities to meet the State peak demand with Central Sector Generators for availing state share of power. The Commission had considered the contractual obligations of the Petitioner in the past years and had approved the Capacity charges and the variable charges of such stations, justifying the tied-up capacities of the Petitioner ensuring long term energy planning for the State. In view of the same, the Commission is requested to consider the submissions made in the Petition and allow the actual cost incurred by the Petitioner towards purchase of power.
- (d) The contention of the Respondent regarding tied up capacity, it is submitted that the Petitioner relied on 17thEPS Notified by CEA, Govt. of India and accordingly executed PPAs with Central State Generators.
- (e) It is due to the long-term power purchase contracts with the generators which ensure the adequate power supply to meet the State requirements as it would not be prudent to arrange the power on day-to-day basis from various generators, which at times may pose great risk to source requisite quantum to

meet the State demand even at very exorbitant price during exceptional situations. Also, there may also be imposition of penalty through DSM towards over drawal from the system during the exigencies due to outage of plants which may continue even for quite nos. of days. To meet real time challenge for matching demand and supply, the capacity addition has been done as per 17th EPS issued by CEA.

- (f) The contention of the respondent is not correct regarding the approval of power cost at highest average ECR instead of actual cost against the drawal from Barh STPS-II & KBUNL as cost components of the above two stations are not within the purview of the Petitioner & further the Petitioner is contractually obliged to bear the Fixed Cost irrespective of the schedule made by the Petitioner and adheres to the merit order policy on real time basis and also at times power is supplied through force scheduling by the Generating entity to run the plant at technical minimum level. In the above premises, any proposal for downward revision of power costs, would definitely deflate the actual cost already incurred by the Petitioner, so as not to enable the Petitioner for recovering the uncontrollable procurement cost, which has been paid at the tariff being determined by the CERC/OERC for the respective FYs.
- (g) The revenue deficit created over the years has been reduced to the extent of margin generated from sale of surplus power after meeting the State demand, and the balance deficit was met through financing from Banks in absence of any working capital to meet the shortfall. Further the Petitioner has stated that the GRIDCO has borrowed from banks at MCLR because of guarantee extended by Govt. of Odisha, resulted in lower rate of interest rate in the range of 2% to 3%, for which the imposition of LPS to the generators could be avoided due to non recovery of uncontrollable power procurement cost from the BSP as approved by the Commission in past years.
- (h) Regarding finance cost towards interest cost on borrowings from various banks to meet revenue gap it is stated that an uncontrollable finance cost on loans which has been incurred due to non-payment of BSP dues by the erstwhile DISCOMs and also due to absence of Cost Reflected Tariff over the years, it has resulted in to a cash deficit situation over the years. Therefore, GRIDCO being functioning as the State Designated entity to supply reliable

power to the consumers of Odisha, was left with no other option but was compelled to finance the power procurement dues of the generators through borrowings from the Banks/FIs with guarantee extended by the State Govt. in the greater interest of the consumer of the State.

12. **The responses of the Petitioner to the queries raised by the Respondent Shri R.P. Mohapatra are reproduced as follows:**

- (a) GRIDCO has tied up capacity with NTPC ER Stations with a share to the tune of 6824.54 MU for FY 2020-21, which was filed before OERC in the ARR submission. The Commission has approved 2869.53 MU as per MOD to meet the State demand. Learned respondent Shri Mohapatra may appreciate that the tied-up capacity is highly required to meet the long-term demand specially the peak demand, in order to mitigate the risk of procurement at higher rate during the period of national scarcity. Moreover, the short fall in supply due to multiple outages of generating stations often poses challenges to meet the State demand specially during the peak hours by procuring through energy market or excess state drawal through DSM mechanism, payable at higher rates in order to meet the State demand in the long run.
- (b) Regarding surplus power position & non recovery of the cost of power of the NTPC stations from the sale through power exchange, it is informed that the surplus power was sold through the energy exchange considering the market price being higher than the variable charges of the respective stations on real time basis. The trading activities are conducted round the clock in order to optimize the total cost through recovery of fixed cost to the maximum extent after meeting the State demand at any point of time. Thus, the recovery of cost from trading of power has always remained the sole objective of the petitioner. However, due to subdued power markets in the last year, the rates remained at moderate level to make full recovery of procurement cost of the NTPC Stations. Moreover State is obliged to make payment of capacity charges of these stations even being surplus during off peak hours and power is not scheduled.
- (c) It is the onus of DISCOMs to make payment of BSP dues in time and GRIDCO to ensure the power supply in the State. The primary reasons of borrowings from banks were due to absence of non-cost reflective tariff over

the years, causing revenue deficit for the petitioner and thereby compelling GRIDCO to make borrowings with State Govt. Guarantee. For the borrowing from banks to pay the monthly bills of generating stations and allowing the escrow relaxation, Delayed Payment Surcharge (DPS), as approved by the Commission during the period prior to the date of vesting of the respective utilities for the unpaid amount was levied. However, for sake of information the respondent may appreciate that all the newly formed TPCL managed DISCOMs are paying the BSP dues in time.

- (d) The Petitioner has submitted that the functioning of the GRIDCO proves the existence in the State of Odisha as a “Deemed Trading Licensee” is consistent and settled with the Law over the years that has been long settled by the Commission particularly in the ARR & BSP Order for FY 2011-12 & that of FY 2012-13 and reiterated in the subsequent ARR & BSP Orders wherein the Commission has ruled that GRIDCO’s continuance & its submission of ARR & BSP and True up Application, before the Commission is as per the provisions of the Law and is in the interest of the State as well as in the interest of the Consumers. Besides, GRIDCO’s Role in the Odisha Power Sector is not merely limited to a Power Trader but goes much beyond of it.

13. Heard the Petitioner and Respondents in detail by virtual mode on 19.07.2022. Having heard the parties and after perusal of the materials on record, we proceed to dispose of the Petition.
14. The audited account of GRIDCO for FY 2020-21 was taken into consideration. We would like to reproduce Para 294 and 295 of our BSP order for GRIDCO for FY 2020-21 as follows:

“294. The Commission has not allowed any drawal from some of the Central Generating Stations i.e. FSTPS-I, II & III and KhTPS-I & II, since considering merit order despatch principle these Stations lie beyond the margin of the merit order. GRIDCO has entered into PPAs with numbers of State and Central Generating Stations. If, GRIDCO draws power from those stations it will have surplus availability of power. Even, if GRIDCO does not draw power from the power stations which are having PPA, it will have to pay fixed cost to those power stations which will eventually be passed on to the consumers as Tariff burden. In order to avoid passage of unnecessary cost to the consumer, the Commission has not considered the fixed cost of those power stations from which GRIDCO would not draw power due to surplus availability. Therefore, the GRIDCO should take up this matter with the State Government to whom Central allocation of power has been made

for payment of fixed cost of those stations. The estimated extra fixed charge for those stations would be Rs.348.37 Crore for FY 2020-21.

295. *The Commission's approval of power purchase for State consumption is based on the merit order dispatch principles in order to keep the power procurement cost at lower level. Hence, any deviation from the merit order dispatch principle should be avoided by GRIDCO. In past years, it is observed that there has been differences between the Commission's approval and actual drawal of energy by GRIDCO. Therefore, the Commission directs GRIDCO to follow the merit order dispatch principle while purchasing power for State consumption. Any major deviation in real time power purchase should be intimated to the Commission. The Commission shall review the quantum and cost of power purchase based on merit order during performance review of GRIDCO. Accordingly, GRIDCO shall furnish the relevant data during the review of its performance along with the justification and rationales in case of any deviation from merit order dispatch principle. The Commission shall also consider the same along with other expenses during truing up exercise."*
15. From the present filing of GRIDCO it is observed that GRIDCO has purchased 31,792.72 MU as against OERC approval of 29,018.76 MU during FY 2020-21. Further during the aforesaid period GRIDCO has traded 5857 MU of power from the surplus availability and earned a substantial amount of Rs.1636 crore from such trading. The Commission had not allowed any drawal from M/s. Kanti Bijli Utpadan Nigam Limited (M/s. KBUNL) power station of NTPC and the fixed cost was also not allowed as the PPA for procurement of power from M/s. KBUNL has also not been approved by the Commission. However, it is observed that during FY 2020-21 GRIDCO has purchased costly power from M/s. Kanti Bijli Utpadan Nigam Limited (M/s. KBUNL) at an average rate of 1893.04 P/U. In view of the above, we have not allowed the claim of fixed cost towards purchase of power from M/s. KBUNL by GRIDCO.
16. The Commission further observed that there was a shortfall in availability of power from the IPPs (1649.68 MU) and some other sources like RE (613.03 MU) against the approved quantum of power for the FY 2020-21. The Commission in its BSP orders had directed that GRIDCO may purchase available power from CGPs and co-generation plants over the approved quantum for state consumption in case of excess state demand or short fall in drawl from other sources than the approved quantum for the year. The same direction was also given by the Commission for the subsequent years. But it is observed that instead of purchasing low cost power from CGPs and other sources, GRIDCO has purchased high cost power from M/s. KBUNL @ Rs.18.93/kwh due to shortfall in availability of power from the IPPs and other

approved sources. Therefore, considering necessity of power for the State, the Commission has allowed GRIDCO for procurement of the said power from M/s. KBUNL @278.70 p/u (true up price) which is the highest variable cost of central thermal power stations. However, the Commission has not allowed the extra amount of Rs 62.04 Cr including past arrear of Rs.4.85 Cr for purchase of power from KBUNL. Further, GRIDCO has claimed an amount of Rs.2.09 Cr for payment made to Barh-II. The Commission has not allowed the same in this order due to non approval of PPA of Barh-II.

17. Further, it is observed from the detailed power purchase data received from GRIDCO that, GRIDCO has claimed Rs.260.94 Cr towards past year cost. On scrutiny, it is found that GRIDCO has paid an amount of Rs.176.61 Cr towards past year cost. Therefore, the Commission allows an amount of Rs.176.61 Cr in the True up order as against GRIDCO claim of Rs.260.94 Cr and direct GRIDCO to claim the balance amount of Rs 84.33 Cr (Rs.260.94 Cr – Rs.176.61 Cr) after payment and submission of supporting document.
18. Therefore, adopting the above principle for calculating the power purchase cost for the FY 2020-21 the truing up exercise of GRIDCO has been carried out. The Commission has not allowed the fixed cost towards procurement of power by GRIDCO from M/s. KBUNL. However, the fixed cost claimed by GRIDCO for all other stations has been allowed in this truing up order of GRIDCO. As mentioned in the above paragraphs the variable charges for procurement of power from M/s. KBUNL is allowed as the highest ECR of the central thermal generating stations. Accordingly the power purchase cost has been calculated based on actual purchase and trued up Power Purchase Cost is given in table below:

Table No.13

	OERC Approval	Actual	Trued Up Power Purchase cost
Energy (MU)	29,018.76	31,792.72	31,792.72
Power purchase Cost (Rs. in Cr.)	8083.74	9498.31 [#]	9349.85 [*]

[#] Actual power purchase cost after adjustment of rebate availed from generators.

^{*}True Up of Power Purchase Cost = Rs.9349.85 Cr (Rs.9498.31Cr - Rs.62.04 Cr - Rs.2.09 Cr - Rs.84.33 Cr)

It is further mentioned that during ARR approval of GRIDCO also, the Commission has allowed full fixed cost of the central sector thermal stations irrespective of drawal except drawal from Barh STPS-II and M/s. KBUNL.

19. The Commission analysed the claim of interest on loan in the truing up petitions of GRIDCO for the FY 2020-21. The Commission in the tariff order for the FY 2015-16 had not allowed the interest on the loan from State Government. The Commission also observed that passing on of Tariff burden to the consumers of the State on account of the interest on the loan availed by GRIDCO due to default of payment in BSP and securitized dues of DISCOMs is unjustified. The Commission further observed that regarding the default of BSP dues by DISCOMs, Govt. and GRIDCO could have definitely played a more proactive role in creating necessary climate of compliance by providing adequate administration and political support. In view of these observations the Commission had allowed Rs.84.07 Cr. in the tariff order of GRIDCO for the FY 2020-21 against the proposal of GRIDCO for Rs.477.63 Cr. The GRIDCO has now claimed Rs.600.58 Cr. as per audited figure in this true up petition which is even more than what was proposed in the ARR petition. The Commission takes similar views in line with GRIDCO's tariff order for the 2015-16 and accordingly allows Rs.84.07 Cr. in this truing up petition towards interest on loan for the FY 2020-21.
20. GRIDCO in its truing up petition has claimed bad debts of Rs.0.96 Cr. for FY 2020-21. The Commission has not allowed any amount under this head in the tariff order for FY 2020-21. In the petition GRIDCO has not explained about the reasons for claiming of bad debt. On analysis of the note no.26 in the audited accounts, an amount of Rs.95.65 lakh is accounted towards bad and doubtful debts without any detailed explanation. The Commission is however not inclined to allow the claim of bad debt as the responsibility of collecting the bill from DISCOMs lies with the GRIDCO.
21. As regards the other elements such as employee cost (Rs.9.8 Cr), R&M (Rs.0.76 Cr) and depreciation (Rs.0.88 Cr) the Commission allows the expenses as reflected in the audited accounts for the FY 2020-21 in this truing up petition. The Commission considers A&G expenses as a controllable cost and allows Rs.5.26 Cr. as approved in the ARR for the relevant year.

22. As regards to revenue from sale of power to DISCOMs, the Commission analysed the audited accounts and now considers the revenue amounting to Rs.6797.81 Cr from sale to DISCOMs as reflected in the audited accounts for the FY 2020-21 against the approved amount of Rs.7848.19 Cr in ARR for FY 2020-21.
23. As regards to trading revenue, the earnings from UI/DSM and other income by GRIDCO, the Commission had approved an amount Rs.90.59 Cr & Rs.42.3 Cr towards trading revenue and other income respectively and no revenue from UI/DSM was considered/ expected in the ARR for FY 2020-21. The Commission analysed the audited accounts and now considers the revenue from trading (Rs.1636.23 Cr), UI/DSM (Rs.57.82 Cr), others income Rs.112.56 Cr [Supplies to others Rs.110.69 Cr +Miscellaneous revenue Rs.0.31 Cr +Interest income from short term deposits and flexi deposits Rs.1.51 Cr + Miscellaneous income Rs.0.051 Cr] and fair value of bonds/ debentures Rs.0.23 Cr as reflected in the audited accounts for the FY 2020-21 amounting to Rs.1806.84 Cr (Rs.1636.23 Cr+Rs.57.82 Cr +Rs.112.56 Cr+Rs.0.23 Cr) in this truing up petition. The Commission directs the petitioner to provide details of non- core income and submit the data during the ARR determination for FY 2023-24.
24. Accordingly the Commission now finalizes the truing up of accounts of GRIDCO for the FY 2020-21 as follows.

Table No.14
Truing Up for FY 2020-21 (Rs. in crore)

	Particulars	OERC Approval (2020-21)	Actuals (Audited) (2020-21)	True Up Allowed (2020-21)	Difference (Approval-Allowed) (Rs. Cr.)
	Expenditure				
1	Cost of Power Purchase	8,083.74	9,498.31	9,349.85	-1,266.11
2	Employee Costs	10.28	9.8	9.8	0.48
3	Repair & Maintenance	0.25	0.76	0.76	-0.51
4	Administrative & General Expenses	5.26	6.2	5.26	0.00
5	Interest chargeable to Revenue	84.07	600.58	84.07	0.00
6	Depreciation	1.03	0.88	0.88	0.15
7	Bad Debts (FY 2020-21)	0	0.96	0	0.00
A	Total Expenditure	8,184.63	10,117.49	9,450.62	-1,265.99
8	Pass Through of Power Purchase Dues	132.05	-		132.05
B	Total Cost	8,316.68	10,117.49	9,450.62	-1,133.94
9	Revenue : Sale of Power to DISCOM	7,848.19	6,797.81	6,797.81	-1,050.38
10	Trading	90.59	1636.23	1636.23	1,545.64

	Particulars				
	Expenditure	OERC Approval (2020-21)	Actuals (Audited) (2020-21)	True Up Allowed (2020-21)	Difference (Approval-Allowed) (Rs. Cr.)
11	UI/DSM	-	57.82	57.82	57.82
12	Other Income	42.3	112.56	112.56	70.26
14	Adj. in Statement of Profit & Loss towards Changes in Fair Value of Bonds during FY (2020-21)	-	0.23	0.23	0.23
15	Receipt from CPSU under MOP	85	0	0	-85.00
C	Total Revenue	8,066.08	8,604.65	8,604.65	538.57
D	GAP allowed by OERC /Difference in Cost and Revenue (Loss as per Audited Annual Accounts) (B-C)	-250.60	-1,512.84	-845.97	-595.37
16	Add approved gap in ARR	-	-		-250.60
17	True up on adjustment of approved gap in ARR				-845.97
18	True up for the year	-	-		-845.97
19	Cumulative TRUE-UP GAP (up to 31.03.2020)	-			-460.58
20	Net Cumulative true up gap upto 31.03.2021				-1,306.55

25. As can be seen from the above tables the cumulative gap as on 31.03.2021 is Rs.1306.55 Cr. The Commission reiterates its earlier stand that in line with the previous BSP order, the Commission is not inclined to consider the amortization of regulatory assets of Rs.1306.55 Cr as a pass through in the ARR. As stated in the previous BSP orders, the amortized amount shall be funded from trading revenue, earnings from UI charges, other miscellaneous receipt and budgetary support from the Government of Odisha.
26. The Commission further directs that the GRIDCO shall file the truing up petition for FY 2021-22 basing on the audited accounts along with the BSP and ARR petition for FY 2023-24 during November 2022.
27. The case is accordingly disposed of.

Sd/-
(S.K. Ray Mohapatra)
Member

Sd/-
(G. Mohapatra)
Officiating Chairperson