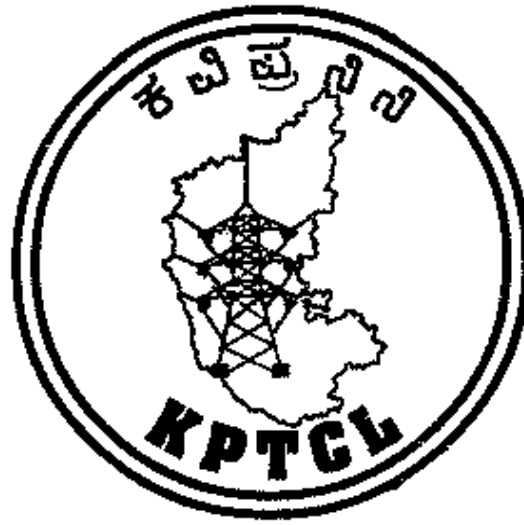


# KARNATAKA POWER TRANSMISSION CORPORATION LIMITED



**ANNUAL PERFORMANCE REVIEW 2021-22**

**NOVEMBER-2022**

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## ABBREVIATIONS

A&G	Administrative & General Expenses
ASCI	Administrative Staff College of India
C&AG	Comptroller & Auditor General
CEA	Central Electricity Authority
CEE	Chief Engineer Electricity
CERC	Central Electricity Regulatory Commission
CGS	Central Generating Station
Commission	Karnataka Electricity Regulatory Commission
CPP	Captive Power Plant
Cr	Crore
CT	Current Transformer
ERC	Expected Revenue from Charges
ESCOM	Electricity Supply Company
FY	Financial Year
GFA	Gross Fixed Assets
GoK	Government of Karnataka
GoI	Government of India
Hrs	Hours
HT	High Tension
HVDC	High Voltage Direct Current
IEGC	Indian Electricity Grid Code
IT	Income Tax
KERC	Karnataka Electricity Regulatory Commission
KPCL	Karnataka Power Corporation Limited
KPTCL	Karnataka Power Transmission Corporation Limited
kV	Kilo Volt
kVA	Kilo Volt Ampere
kW	Kilo Watt
kWh	Kilo watt Hour
MoP	Ministry of Power

MU	Million Units
MUSS	Master Unit Sub Station
MW	Mega Watt
NFA	Net Fixed Assets
OCC	Operational Coordination Committee
O & M	Operation and Maintenance
PGCIL	Power Grid Corporation of India Limited
PF	Provident Fund
PFC	Power Finance Corporation
PPA	Power Purchase Agreement
PRDCL	Power Research & Development Corporation Limited
R&M	Repair & Maintenance
PT	Power Transformer
REC	Rural Electrification Corporation
RoE	Return on Equity
SLDC	State Load Dispatch Centre
SRPC	Southern Region Power Committee
TA & QC	Technical Audit and Quality Control
TCC	Technical Coordination Committee
T&D	Transmission & Distribution
TL & SS	Transmission lines and Sub Stations

**“ A ”**

**BEFORE THE HON'BLE KARNATAKA ELECTRICITY REGULATORY COMMISSION**  
**AT BENGALURU**

**IN THE MATTER OF:**

**Application under Section 62 and 64 of the Electricity Act 2003 read with relevant KERC (Tariff) Regulations-2000 and amendments, KERC (Terms and conditions for determination of transmission Tariff) Regulations-2006 and amendments, for the purpose of Annual Performance Review of Transmission Licensee-KPTCL, based on Audited Annual Accounts of KPTCL for FY-22.**

**Karnataka Power Transmission Corporation Ltd. (KPTCL),  
Kaveri Bhavan,  
Bangalore – 560 009**

**..... Applicant**

**KPTCL most respectfully submits the Statement of Annual Revenue Requirement for FY 2021-22 based on the Audited Annual Accounts for the purpose of Annual Performance Review, under Multi Year Tariff (MYT) Regulations, for approval by the Hon'ble Commission:**

1. KPTCL is a deemed Transmission Licensee under Section 14 of the Electricity Act 2003, carrying out the business of transmission of electrical energy in the State of Karnataka.
2. This is an application, under Section 62 and 64 of the Electricity Act 2003, read with KERC (Terms and conditions for determination of Transmission Tariff) Regulations-2006 and other relevant Regulations and its subsequent amendments.



## **CHAPTER 1**

### **1.0. ANNUAL PERFORMANCE REVIEW (APR) FOR FY-22**

#### **1.1 APR FILING REQUIREMENT**

In terms of Section 62 and 64 of the Electricity Act 2003 read with KERC (Terms and conditions for determination of transmission Tariff) Regulations 2006 and its subsequent amendments, the Annual Revenue Requirement for FY-22 is being submitted under Multi Year Tariff Principles for the purpose of Annual Performance Review (APR) by the Hon'ble Commission.

**1.2** The formats prescribed in KERC (Tariff) Regulations-2000 (and its subsequent amendments) as applicable for Expected Revenue from Charges and Annual Revenue Requirement (ARR) filing are enclosed along with this application duly furnishing the details for the financial year 2021-22. Audited Annual Accounts of KPTCL for FY-22 was furnished to KERC vide letter No. KPTCL/B36/33995/2022-23/1179 dated 02.11.2022. The details of income from transmission charges and the expenditure as per the Audited Accounts of KPTCL for FY-22 are detailed in the following paragraphs.

**1.3** The Licensee confirms that the Annual Revenue Requirement and the revenue gap are based on the Audited Accounts for FY-22.

**1.4** The Financial Advisor, Regulatory Affairs, KPTCL is authorized to sign and file the petition for Annual Performance Review of FY-22 before the Hon'ble Commission on behalf of KPTCL by the resolution passed

by the Board of Directors by circulation in accordance with Article 41 of Articles of Association of KPTCL vide Circular Resolution No.02/2022-23 dated 28.11.2022.

### **1.5 KPTCL Profile:**

- i) Karnataka Power Transmission Corporation Limited is a Company registered under the Companies Act, 1956 and incorporated on 28<sup>th</sup> July 1999. KPTCL commenced its operations from 1<sup>st</sup> August 1999 by continuing the Transmission and Distribution functions of the erstwhile Karnataka Electricity Board. On unbundling, w.e.f 1<sup>st</sup> June 2002, KPTCL became a Transmission company but continued to be involved in Bulk Power Purchase Activity. After enactment of Electricity Act 2003 and w.e.f 10<sup>th</sup> June 2005, KPTCL is not involved in the bulk power purchase activity as the Act bars the transmission licensee from trading of electricity. Since then, KPTCL is only a transmission entity wholly owned by the Government of Karnataka, operating now with an authorized share capital of Rs. 3000 Crore having paid up capital of Rs. 2182.32 Cr.
- ii) Karnataka Power Transmission Corporation Limited is discharging its functions as envisaged in Section 39 and 40 of Electricity Act-2003 and also responsible for grid operation in the State of Karnataka.
- iii) KPTCL enables the ESCOMs to serve nearly 285.97 lakhs consumers of different categories spread all over the State covering an area of 1.92 lakh square kilometers. To transmit power in the State, KPTCL operates 1299 Sub-stations with

Transmission network of 40304 CKms with voltages of 66 kV and above. To enable easier operation of the system, KPTCL has six Transmission Zones; each headed by a Chief Engineer, sixteen Circles, each headed by a Superintending Engineer, Fifty Divisions, each headed by an Executive Engineer. Maintenance of lines, stations and construction of transmission system are being looked after by the above officers.

- iv) There are 35 Transmission line and Sub-Station maintenance Divisions (TL&SS) in KPTCL which are involved in the operation and maintenance of the transmission system in Karnataka. Besides, there are 15 Major Works Division which takes care of construction activities related to intra-state Transmission system across the State of Karnataka.
- v) The Relay Testing, Research & Development activities are headed by Chief Engineer Electy., with two wings such as Relay Testing and Research & Development across State's Transmission system and monitors protection issues and condition monitoring of Transmission system elements. There are 16 Relay Testing (RT) Divisions in KPTCL which works under 6 Relay testing Circles. Each Division is responsible for maintenance of protective relays, meters and addressing critical troubleshooting issues in all sub-stations of KPTCL. Also pre-commissioning tests of all new sub-stations are performed by the RT Divisions besides calibrating all KPTCL interface meters on periodical basis.
- vi) The Technical Audit & Quality Control (TA&QC) wing is headed by the Chief Engineer Electy., TA&QC, Bengaluru. The main

functions of the TA&QC wing is Inspection of materials in on-going Total Turnkey / Partial Turnkey Sub-Station works, line works, augmentation works, IPP works, Self execution works and Line shifting works etc. Also periodical inspections of stations, lines, MW/TL&SS stores are performed by TA&QC wing. They also perform materials inspections at Factory and sites, auditing of completed works, inspection of factory premises for vendor analysis and miscellaneous works, investigation of Petitions/Complaints and inspection of civil works pertaining to sub-stations/Lines.

- vii) Separate Hotline wing headed by the Chief Engineer is established. Separate Hotline Circle is established with 2 Hotline Divisions and 6 Sub-divisions to facilitate live line work ( without taking LC) using hot stick method and also bare hand technique using insulated elevated platform for replacing punctured/ broken insulator / deteriorated jumps and establish connectivity of receiving station / sub-station .
- viii) KPTCL's Finance and Accounts are managed by the Accounts and Resources wing headed by Financial Advisor (Accounts & Resources). There are 82 Accounting units. The Finance wing organizes in-time funding for various projects of KPTCL, responsible for accounting of all transactions and timely preparation of Annual Accounts of the KPTCL.
- ix) Financial transactions in the zones are monitored by the Controllers of Accounts in the respective zones.

- x) All activities are audited by Internal Audit staff headed by Financial Advisor (Internal Audit).
- xi) All activities pertaining to Regulations issued by KERC and all correspondence with KERC are being dealt by the Financial Advisor (Regulatory Affairs). Regulatory legal matters before KERC/CERC/APTEL/HC/SC are also being handled by this wing. Periodical Regulatory Awareness programs for Officers of KPTCL are also being conducted by Officers of Regulatory Affairs wing.
- xii) The Grid Operation Activity is carried by the State Load Dispatch Center (SLDC) which is headed by the Chief Engineer Electy., and currently functioning under KPTCL. Along with Grid operations, SLDC also takes care of SCADA activities, Renewable Energy Management Center and Transmission Billing Center. The commercial and accounting aspects of SLDC are looked after by Financial Advisor (SLDC).
- xiii) The main source of revenue of KPTCL is transmission charge. The annual income of the company was Rs. 4379.57 Crore during 2021-22 as per Audited Annual Accounts.
- xiv) The total installed sub-station capacity of the State as on 31.03.2022 was 76768 MVA (2998 Transformers). The peak load met was 14818 MW on 18.03.22 during the year 2021-22.

## **MISSION STATEMENT**

The mission of Karnataka Power Transmission Corporation Limited (KPTCL) is to ensure reliable quality power to its customers at competitive prices. The KPTCL is committed to achieve this mission through:

- Encouraging Best practices in transmission.
- Ensuring high order maintenance of all its technical facilities.
- Emphasizing the best standards in customer service.

To be the best Transmission Utility in the Country, the KPTCL pledges to optimize its human and technical resources for the benefit of all of its customers.

## CHAPTER – 2

### 2.0. COMMISSION's DIRECTIVES:

KPTCL has been making sincere efforts to comply with the Directives issued by the Commission. There has been substantial improvement in processes like Grid Operations, Capital works and Financial Management. KPTCL submits the compliance of the Directives duly explaining the latest progress in the implementation of the same in the following paragraphs.

The Commission, in the Tariff Order dated 04<sup>th</sup> April 2022 issued the following directives for compliance by KPTCL:

### 2.1 New Directive: Issue of Evacuation Clearance by KPTCL:

The Commission directed KPTCL to evolve a definite time frame for clearing the evacuation requests by fixing timelines at different stages of giving officers/officials for the delay so as to ensure that the evacuation clearance is given within a reasonable time and avoid delays and consequent litigations in the matter.

#### **Compliance:**

The detailed flowchart illustrating the definite time frame for clearing the evacuation scheme by fixing time lines to avoid delay so as to ensure that the evacuation approval is accorded within time was submitted to KERC vide Letter No.: KPTCL/B36/33973/2022-23/1061 Dated:12.10.2022.

## **2.2 New Directive: Issue of No Objection Certificates (NOC) for Wheeling and Banking facility to Open Access Consumers/ Captive Generators.**

The Commission directed KPTCL and SLDC to strictly adhere to the timelines fixed by the Commission as per the OA Regulations. For this purpose, they shall define the responsibility centers and fix definite timelines at each of the processing stage and ensure that the W&B applications are disposed of within the prescribed timeframe.

### **Compliance:**

The detailed report on the procedure adopted/to be adopted for issue of No Objection Certificates (NOC) for wheeling and banking facility to open access consumers/captive generators duly indicating definite timelines was submitted to KERC vide Letter No.: KPTCL/B36/33973/2022-23/1061 Dated:12.10.2022.

## **2.3 Existing Directive: Reactive Power Compensation and restoration of failed Capacitors:**

The Commission directed KPTCL to restore the failed capacitors timely and submit the status report of capacitor banks to the Commission, regularly and also furnish details of Reactive Energy Charges paid to CTU. Further, the Commission has directed KPTCL to maintain minimum 5% of spare capacitor for replacement of failed capacitors.

### **Compliance:**



The monthly status report of capacitor banks are being periodically submitted to KERC. The Chief Engineers of the transmission zones are taking timely action to restore the failed capacitors as and when they are failed. Further, the Corporate office has directed zonal Chief Engineers to maintain sufficient spares of capacitor banks to reduce the outage period, so as to improve the percentage working of capacitor banks both in respect of numbers and capacity.

The Status of Capacitor Banks as on July 2022 was submitted to KERC vide letter No. KPTCL/B36/ 2022-23/34005/1133 dated: 29.10.2022. Further, the details of Reactive Energy Charges for the FY-22 have been furnished to KERC vide letter No. KPTCL/B36/2021-22/22453/1255 dated 09.11.2022.

#### **2.4 Existing Directive: Implementation of Intra State ABT:**

KPTCL, SLDC and ESCOMs are directed to conduct a meeting under the chairmanship of MD KPTCL to try and sort out the issues with regards to billing methodology under Intra-State ABT once KPCL completes installation of ABT meters of its hydel stations so as to find a way out to implement the Intra-State ABT at least by March 2022.

#### **Compliance:**

KPCL is yet to complete the installation of ABT meters of its hydel stations. KPTCL has addressed a letter to KPCL on 22.12.2021 and 30.06.2022 to expedite completion of the installation along with replacement of all interface points energy meters by ABT meters

at the Generating Stations for implementation of SAMAST. Hence, a meeting will be conducted to sort the issues with regard to billing methodology under Intra-State ABT once KPCL completes installation of ABT meters.

## **2.5 Existing Directive on Man Power Studies conducted:**

The Commission has directed KPTCL to circulate the report submitted by the internal committee of KPTCL among all the ESCOMs and similar action be taken in all the ESCOMs for streamlining the deployment and career growth in order to achieve higher employee productivity and accrual of greater benefits to the organization which would also reduce the tariff burden on the consumers.

Further, the Commission directs that KPTCL shall ensure proper implementation of the Man Power planning strategy with a view to ensure optimum use of human resources to minimize its operational costs.

### **Compliance:**

KPTCL has entrusted Human Resource Study to M/s. Institute of Social and Economic change (ISEC) , Bengaluru vide work award dated 23.09.2021. The Agency has submitted its Interim report on 12.04.2022 , which is under verification/validation.

The said report furnished by the Agency is limited to activities of KPTCL alone. Hence, the report can only be suitable for implementation in KPTCL only.

## **2.6 Existing Directive on prevention of electrical accidents:**

The Commission has directed the KPTCL to speed up the work of identification and rectification of hazardous locations and also to submit a stringent strategic action plan along with the details of number of locations identified, rectified and balance number of such locations to prevent electrical accidents in transmission lines and sub-stations quarterly, to the Commission.

### **Compliance:**

The Chief Engineers of the transmission zones are regularly carrying out / monitoring works related to rectification of hazardous locations. The zone-wise status of accidents occurred in KPTCL along with details of hazardous locations was furnished to the Hon'ble Commission vide letter No. KPTCL/B36/34009/2022-23/1268 Dated: 14.11.2022.

## **CHAPTER – 3**

### 3.0 Energy Transmission and Losses in FY-22:

Total Energy input to KPTCL's transmission system during FY-22 was 75677.107 MU and the energy transmitted at IF points with ESCOM's was 73416.388 MU resulting in transmission loss of 2.987%. Actual Voltage wise losses are noted below:

**Table- 1**  
**Voltage Wise Transmission Losses (%) for FY-22**

<b>400 kV</b>	<b>0.260</b>
<b>220 kV</b>	<b>1.473</b>
<b>110 kV</b>	<b>0.336</b>
<b>66 kV</b>	<b>0.919</b>

**Table- 2**  
**Trajectory of Transmission Losses (%) for FY-22**

	<b>Approved in T.O 04.11.2020</b>	<b>As per Actuals</b>
<b>Upper Limit</b>	<b>3.028</b>	<b>2.987</b>
<b>Average</b>	<b>2.978</b>	
<b>Lower limit</b>	<b>2.928</b>	

The details of Transmission losses for FY-22 has been furnished to KERC vide letter KPTCL/B36/2021-22/22467/1082 dated 17.10.2022.

**Table- 3**  
**System Availability for FY-22**

<b>System Availability</b>	<b>Target Availability as per KERC MYT Regulations</b>	<b>Actual</b>
<b>Percentage</b>	<b>98%</b>	<b>99.19%</b>

The details of Transmission system availability for FY-22 has been furnished to KERC vide letter KPTCL/B36/22458/2021-22/1238 dated 7.11.2022. The system availability achieved for the year is better than the target specified in the KERC MYT Regulations. KPTCL requests the Hon'ble Commission to allow incentive in terms of MYT Regulations.

## CHAPTER – 4

### 4.0 PERFORMANCE OF KPTCL FOR 2021-22

#### 4.1 Financial Performance of KPTCL for FY-22

Table- 4

(Amount in Rs. Crore)		
Sl No	Particulars	Actual as per Audited Accounts for FY-22
1	<b>Operation and Maintenance Cost:</b>	
a)	Employee costs	1310.09
b)	Repairs and Maintenance costs	334.24
c)	Administration and General expenses	147.10
	<b>Total O &amp; M Expenses</b>	<b>1791.43</b>
2	Depreciation	1169.27
3	Finance costs	574.45
4	Interest on working capital	51.99
5	Return on equity	892.64
6	Other debits , if any	34.76
7	Exceptional items	-178.31
8	Tax expense	287.33
	<b>TOTAL Expenditure</b>	<b>4623.56</b>
	<b>Less</b>	
9	Interest and finance charges capitalized	111.34
10	Other expenses capitalized	68.62
11	Other Income	272.59
12	<b>Net ARR</b>	<b>4171.01</b>
13	<b>Revenue from Transmission Charges</b>	<b>4106.98</b>
14	<b>Revenue Gap</b>	<b>64.03</b>
15	<b>Add:</b> Amount disallowed in respect of works which were identified as imprudent for FY 20 and FY 21, which are now prudent. (Rs.1.51Crs. +Rs.3.82 Crs.)	5.33
16	<b>Add:</b> Consequent to G.O. dated 15.11.2022 and corrigendum dated 24.11.022 , Additional Employee cost towards GoK portion of Pension and Gratuity Expenditure	2734.10

	a) Towards Arrears from FY 21-22 TO 22-23 to be collected in three equal instalments ie., (Rs.3,357.27 Cr./3)= 1,117.76 Cr. <b>PLUS</b> b)Towards estimated contribution for FY 2023-24 – Rs. 1616.34 Crs.	
17	<b>Total Revenue Gap</b>	<b>2803.46</b>

**Table- 5**  
**Total Revenue for FY-22**

(Amount in Rs. Crore)

Particulars	2021-22
Revenue from Transmission Operation	4106.98
Other Income	272.59
<b>Total Income</b>	<b>4379.57</b>

#### 4.2 CAPITAL WORKS – ACHIEVEMENTS for FY-22

During the year 2021-22 the following works were completed.

**Table- 6**

#### Capital Works – FY-22

Particulars	2021-22	
	Target	Achievement
Stations (Nos)	40	41
Lines (Ckms)	941.78	1463.43
Augmentation(Nos)	103	172

Capital Expenditure	2021-22
As per Audited Accounts (Rs. in Crore)	<b>3014.13</b>

**Table- 7****Station Works Completed During FY-22**

<b>Particulars</b>	<b>Achievement ( No's)</b>	<b>MVA Added</b>
400 kV	0	0
220 kV	10	2300
110 kV	21	360
66 kV	10	127
<b>Total</b>	<b>41</b>	<b>2787</b>

**Table- 8****Length of Line constructed during FY-22 (in Ckt. Kms)**

<b>Particulars</b>	<b>Achievement Ckt.Kms</b>
400 kV	0.00
220 kV	434.186
110 kV	654.576
66 kV	374.671
<b>Total</b>	<b>1463.43</b>

**Table-9****Augmentation works – FY-22**

<b>Particulars</b>	<b>Achievement (Nos)</b>
220 kV	7
110 kV	58
66 kV	107
<b>Total</b>	<b>172</b>



## **CHAPTER – 5**

### **5.0 RATIONALE FOR TRANSMISSION CHARGES:**

The aim of KPTCL is to provide efficient transmission network in the State which is stable, robust and capable of transmitting power in a most reliable and cost-effective manner. KPTCL intends to become *Number One* Transmission Utility in the Country.

Creation of Transmission infrastructure is the core activity of KPTCL and Capital works program plays a vital role in achieving vision and mission of KPTCL. To achieve this goal, KPTCL has to make huge capital investment. To meet the capital investment, KPTCL has to depend largely on borrowings from funding agencies. For this purpose, KPTCL follows an aggressive borrowing programme aimed at minimizing interest rates and obtains loans at best possible interest rates from funding agencies. KPTCL also requests for equity infusions from GoK from time to time.

In the above back ground, based on the MYT regulations notified by KERC, KPTCL is filing its Annual Performance Review for FY-22 in order to recover the revenue gap between Actual Transmission Revenue earned from approved Transmission Charges and Actual Transmission expenditure incurred. Adequate Revenue Stream ensures adequate investments in the sector. Therefore KPTCL needs to cover its costs in full along with a Return on Equity as allowed under KERC Regulations.

### **5.1 Rationale for Capital investment Programme**

The National Electricity Policy and the National Electricity Plan emphasizes on creation of transmission infrastructure to realize the MoP vision of providing power for all. Further due to upsurge in Renewable Energy Generation in the State, necessary evacuation infrastructure needs to be created by KPTCL. Hence Green Energy Corridors are being developed by KPTCL. In line with these activities, KPTCL has envisaged adequate capex programme in the recent past and in the current year as well. This will definitely help in keeping required growth rate of all sectors in the State and ensures efficient transmission of power for equitable supply of electricity penetrating the rural areas of the State.

**5.2** Karnataka is India's eighth largest State in terms of geographical size (1,91,791 square km). In order to meet the growing power demand in rural and urban areas, KPTCL, during FY 2021-22 has constructed substations at voltage levels of 220, 110 and 66 kV to meet the additional loads and to improve the voltage conditions. In addition to this, as many as 172 augmentation works were completed to strengthen the existing system.

### **5.3 Need to Ensure Assured Revenue Stream**

KPTCL manages critical function of putting up intra-state transmission system facilities to provide evacuation for Generators, to meet additional loads and ensure appropriate voltage at all levels of transmission. To ensure smooth transmission, it carries out periodical maintenance of the system also. Its efforts are mainly focused on improving transmission system availability and system reliability. These roles involve costs that are fixed in nature and have to be met by a

steady stream of revenue. For this purpose, the actual costs incurred for transmission operation need to be allowed for recovery from its consumers i.e. mainly the five ESCOMs of the State. It is also necessary that these ESCOMs pay full transmission charges regularly as per the tariff orders passed by the Hon'ble Commission and in accordance with the Power Transmission Agreement. Of late ESCOMs are not paying transmission charges on priority. Transmission charges of Rs.1315.80 Cr. is due from ESCOMs as on 31.10.2022. The Hon'ble Commission may kindly direct the ESCOMs to adhere to monthly payment of full Transmission charges in terms of the Tariff Order issued by this Hon'ble Commission.

**Table- 10**  
**Summary of KPTCL's Financial Performance for FY-22**

(Amount in Rs. Crore)		
Sl No	Particulars	Amount Rs. in Crore
1	Revenue Earned from transmission operation	4106.98
2	Annual Revenue Requirement	4171.01
<b>3</b>	<b>Revenue Deficit (2-1)</b>	<b>64.03</b>
4	<b>Add:</b> Amount disallowed in respect of works which were identified as imprudent for FY 20 and FY 21, which are now prudent. (Rs.1.51Cr.+Rs.3.82 Crs.)	5.33
5	<b>Add:</b> Consequent to G.O. dated 15.11.2022 and corrigendum dated 24.11.2022, the Additional Employee cost towards GoK portion of Pension and Gratuity Expenditure a) Towards Arrears from FY 21-22 To FY 22-23 to be collected in three equal instalments i.e., (Rs.3,357.27 Cr./3)= 1,117.76 Cr.	2734.10

	<b>PLUS</b> b) Towards estimated contribution for FY 2023-24 – Rs. 1616.34 Crs.	
<b>6</b>	<b>Total Revenue Gap</b>	<b>2803.46</b>

It may be seen that, the revenue earned from existing transmission tariff was not sufficient to cover the costs to an extent of **Rs. 64.03 Cr.** for FY22 along with this, following additional costs are included:

**Prudence Check Related Amounts:**

Depreciation and interest on loan to an extent of Rs. **5.33** Crs. which was disallowed in respect of imprudent works for FY 20 and FY 21 which are prudent now.

The Hon'ble Commission in its Tariff Order 2021 dated: 09.06.2021 and Tariff Order 2022 dated: 04.04.2022 had disallowed Rs. 1.51 Crore for FY20 and Rs. 3.82 Crore for FY21 respectively towards depreciation and interest on loans in respect of 2Nos. of imprudent works. The current status of the said works are noted below;

**a.Badanaguppe:** Establishing 2x31.5MVA, 66/11KV Badanaguppe Sub-Station with associated line in Chamarajnagar Taluk

This work was taken up based on the specific request of KIADB and specific direction from the Government of Karnataka with the commitment that Industrial development would take place in the areas connected to Badankuppe Station. At present, 5 Nos. of feeders are charged. Further, ESCOMs have been informed to utilize the feeders for optimum loading of the station as the responsibility of taking the 11KV loads lies with CESC.

In view of the above, the Hon'ble Commission is requested to consider the work as prudent and allow the same in the ARR for FY22.

**b.Malladihalli:** Establishing 2x8MVA, 66/11KV SS Malladihalli with construction of 11.538 Kms 66KV SC line on DC towers from proposed 220KV Station, Benkikere to proposed Station in Hosadurga Taluk.

This work was taken up to reduce the loads on existing 66KV Holalkere and Ramagiri SS. The station was completed and line work was delayed due to severe RoW issues. The 220/66KV Benkikere Station was commissioned on 15.02.2022 and the load was shifted from Honnali to Benkikere on 17.02.2022.

At present, all the eight Nos. of 11KV feeders are charged and station peak recorded is 120Amps (12 MW). Also, the existing two nos. of 8MVA Power Transformers are augmented to 12.5MVA owing to load growth. The subject power transformer No.1 and 2 were commissioned on 16.04.2022 and 11.10.2022 respectively. Hence, the Hon'ble Commission is requested to consider the work as prudent and allow the same in the ARR for FY22.

**From the above, it is evident that KPTCL has taken timely action to fulfil the objectives of the projects. As such, KPTCL requests to allow Rs. 5.83 Crores which was disallowed earlier.**

**Additional Employee Cost consequent to Government Order Dated: 15.11.2022.**

The Additional Employee cost to an extent of Rs. 2734.10 Cr. as noted below has been included towards Pension and Gratuity Contribution

for FY 24 through tariff as per Government of Karnataka Order dated 15.11.2022 and corrigendum dated 24.11.2022.

**Table-11**  
**Additional Employee Cost towards**  
**Pension and Gratuity Contribution – FY22**

<b>Sl. No.</b>	<b>Particulars</b>	<b>Amount in Rs. Crore</b>
1	Towards Arrears from FY 21-22 To 22-23 to be collected in three equal instalments ie., (Rs.3,357.27 Cr./3)	1,117.76
2	Towards estimated contribution for FY 2023-24	1616.34
<b>Total</b>		<b>2734.10</b>

After inclusion of the above additional costs, total revenue gap works out to Rs. 2803.46 Cr. Hence, the Commission may kindly allow this Total Revenue Gap to be recovered from ESCOMs in FY 2023-24.

## CHAPTER-6

### **6.0 BREAK UP OF TRANSMISSION EXPENSES FOR FY-22**

#### **6.1 Repairs and Maintenance Expenses:**

The R & M expenses incurred for the year is Rs. 334.24 Crore. R&M Expenses for FY-21 was Rs. 327.84 Crore (as per published audited accounts of FY-21) which shows an increase of Rs. 6.40 Cr over previous year because of increase in Plant and Machinery Repair cost, Repairs and maintenance of buildings, vehicles and Office Equipments.

The cost incurred for various items of R & M expenses are tabulated below.

**Table- 12**  
**Repairs and Maintenance Expenses for FY-22**  
**(Amount in Rs. Crore)**

Sl. No.	Particulars	2021-22
1	Plant and Machinery Transformers	283.30
2	Lines, Cable Network, etc.	31.41
3	Buildings	15.32
4	Civil works	6.21
5	Vehicles	0.48
6	Furniture & Fixtures	0.00
7	Office Equipment	0.66
	<b>TOTAL</b>	<b>337.38</b>
	<b>Less:</b> Expenses shared by ESCOMs	<b>3.14</b>
	<b>Less:</b> R&M Expenses Capitalized	<b>0.02</b>
	<b>TOTAL</b>	<b>334.22</b>

R & M expenses claimed in APR is Rs. 334.22 Crore after deducting the R & M expenses capitalized amount of Rs 0.02 Cr.

## 6.2 Employee Costs:

Employee costs incurred for FY-22 as per Audited Annual Accounts is Rs. 1252.92 Crore. For FY-20, it was Rs. 1164.31 Crore as per audited

accounts of FY-21. There is an increase of Rs. 88.61 Crore over previous year. This increase is mainly due to increase in salaries and Earned leave encashment.

The details of the Employee Costs are shown below:

**Table- 13**  
**Employee Costs details – FY-22**

SI No	Particulars	2021-22
		Amount in Rs. Crore.
1	Salaries ( Basic Pay)	882.76
2	Bonus and Exgratia	6.91
3	Earned Leave Encashment	92.26
4	Medical expenses reimbursement	8.28
5	Payment to Helpers ( Monsoon gang)	0.04
6	Terminal Benefits	1.57
7	Terminal Benefits-NDCPS Employee	159.53
8	KPTCL contribution to P & G Trust	183.04
9	EPF contribution in respect of Contract employee	0.39
10	Pension and Leave Contribution made in respect of employee of other department	0.15
11	Other Allowances	1.69
12	Staff Welfare Expenses	0.03
13	Payment under Workmen Compensation Act	0.17
	<b>Total</b>	<b>1336.82</b>
	<b>Less :</b>	
14	Expenses shared by ESCOMs	26.46
15	Employee cost Capitalized	57.17
16	KPTCL Portion of P & G Trust	0.27
	<b>Net Amount</b>	<b>1252.92</b>

Net Employee cost claimed in ARR is **Rs. 1252.92 Crore.**

### **6.3 Administration and General Expenses**

The A & G expenses incurred for the year is Rs. 156.50 Crore as per Audited Annual Accounts for FY-22. Details of A&G Expenses are



provided in form T-7 of the filing. Net Administration and General Expenses included in ARR is Rs. 135.67 Crore. (Rs. 156.50 Cr. – Rs. 20.83 Cr) where Rs. 20.83 Cr. includes 9.38 Cr. expenses shared by ESCOMs, Rs. 0.03 Cr. KPTCL portion of P&G Trust and Rs. 11.43 Cr capitalised expenses).

#### 6.4 Operation and Maintenance Expenses under MYT Regulations

- a) The Operation and Maintenance Expenses which include R&M costs, Employee Costs and A&G expenses are to be calculated as per the norms prescribed by KERC in its order dated 30.05.2019.

**Table- 14**

**O&M Expenses as per Norms for FY-22 as Per KERC Order dated 30.05.2019**

<b>Particulars</b>	<b>2021-22</b>
O & M Expenses for lines (in Rs. Thousand/km)	136.98
O & M Expenses for bay (in Rs. Thousand/ bay)	511.22

- b) The details of circuit kilometers of transmission lines and bay details as on 31.03.2022 are given below.

**Table-15**

**Voltage class wise Transmission Lines as on 31.03.2022**

Voltage Class	Transmission lines (in Ckms)
400 kV	3701
220 kV	12623
110 kV	11830
66 kV	12150
<b>Total</b>	<b>40304</b>

**Note:** The Transmission Lines shown in Table 15 does not include dedicated lines constructed by IPPs.

**Table-16**

**Transmission Capacity among ESCOMs as on 31.03.2022**

Company	2020-21	2021-22	
	Transmission Capacity in MW Existing	Transmission Capacity in MW	
		Added	Total
BESCOM	12066	1488	13554
MESCOM	1955	85	2040
CESC	2762	255	3017
HESCOM	4765	425	5190
GESCOM	2890	170	3060
<b>TOTAL</b>	<b>24438</b>	<b>2423</b>	<b>26861</b>

**Table- 17**

**Number of Bays as on 31.03.2022**

Type	No.
Line Bay	6017
Transformer bay	2921
PT Bay	1838
Capacitor Bank Bay	1242
11 kV Bay	13991
<b>Total</b>	<b>26009</b>

**Note:** The Number of bays shown in Table 17 does not include 636 Nos of Bays constructed by IPPs. These bays are maintained by KPTCL and O & M charges are collected separately at the rates approved by KERC from time to time.

**Table- 18**

**O&M Expenses calculated as per KERC Norms for FY-22**

Particulars	Rate	Qty	O&M Costs (Rs. in Crore)
O&M Expenses for lines (in Rs. Lakhs/km)	1.37	40304	552.16
O&M Expenses for bays (in Rs. Lakhs/ bay)	5.11	26009	1329.06
<b>Total</b>			<b>1881.22</b>

But the Actual O & M Expenses as per Audited Accounts works out to Rs. 1722.81 Cr. (1252.92+334.22+135.67). As per KERC (Terms and conditions of tariff) (Second amendment) Regulations, 2015 the O & M Expenses to be worked out as under:

**Table- 19**

**Uncontrollable O & M costs**

<b>SL No.</b>	<b>Particulars</b>	<b>Amt in Rs. Cr</b>
1.	Earned leave encashment	92.26
2.	Additional O & M Expenses on account of Terminal Benefits to NDCPS Employees	159.53
3	Additional O & M Expenses on account of P & G contribution	183.04
	<b>TOTAL</b>	<b>434.83</b>

**Table- 20****Allowable O & M Expenses for FY-22 as per norms**

<b>SL No.</b>	<b>Particulars</b>	<b>Amt in Rs. Cr</b>
1.	O & M Costs as per Norms	1881.22
2.	Un controllable O & M Costs	434.83
	<b>TOTAL</b>	<b>2316.05</b>

**Allowable O & M Expenses as per norms is Rs. 2316.05 Cr. However KPTCL requests the Hon'ble Commission to allow O & M expenses of Rs. 1722.81 Cr. (excluding expenses capitalised of Rs.68.62 Cr) as per Actual.**

**6.5 Depreciation**

The Depreciation as per the Audited Accounts for FY-22 is Rs. 1169.27 Crore. Rs. 1169.27 Cr includes an amount of Rs. 137.00 Cr being depreciation on assets created out of consumer contribution. As Rs. 137.00 Cr is included in Other Income and the Other Income is reduced in ARR. The details of depreciation are indicated in form T-8.

**The Hon'ble Commission is requested to consider the actual amount of depreciation of Rs. 1169.27 Cr and allow the same.**

### **6.6 Interest and Finance Charges**

The Actual amount incurred towards interest and finance charges as per Audited Accounts for FY-22 is Rs. 626.44 Crore. The details of loan availed and interest costs are shown in prescribed form T-9. After considering interest capitalization amount of Rs. 111.33, the interest charges included in ARR is Rs. 515.11 Crore.

**As this interest expenditure is incurred as per actual interest on loans availed by KPTCL, the Hon'ble Commission is requested to consider and approve an amount of Rs. 515.11 Cr in ARR.**

### **6.7 Return On Equity:**

The Hon'ble Commission in its Order dated 30.05.2019, has worked out Return on Equity @ 15.5% on the Equity and Reserves & Surplus. On the same lines, RoE has been worked out for FY-22 and included in the Annual Revenue Requirement for FY-22 as under.

### **Table- 21**

**RoE Calculations for FY-22**

(Amount Rs. in Crore)

<b>Particulars</b>	<b>Approved</b>	<b>Actual</b>
Paid up share capital	2182.32	2182.32
Share Deposit	0.00	0.00
Reserves & Surplus	2086.25	3576.63
<b>Total Equity</b>	<b>4268.57</b>	<b>5758.95</b>
<b>Approved RoE @15.5% with MAT</b>	<b>843.36</b>	<b>892.64</b>

**6.8 Tax Expenses**

The Hon'ble Commission vide Order dated 30.05.2019 had approved RoE with MAT, KPTCL's tax expenses for FY-22 is Rs.287.33 Crore. The same is claimed in APR for FY-22.

**6.9 Other Debits**

An amount of Rs.34.76 Crore is claimed in ARR as other expenses the details of which are provided in Format T-11.

**6.10 SLDC Charges**

The Hon'ble Commission vide Order dated 30.05.2019 approved SLDC charges of Rs. 29.30 Crore and concluded that the entire SLDC charges to be recovered from ESCOMs and long term users of transmission network. For FY-22, the actual SLDC charges amounts to Rs. 30.57 Crore, the details of which are provided below.

**Table- 22**  
**SLDC Charges**

(Amount in Rs. Crore)

<b>Particulars</b>	<b>As Per Audited Accounts 2021-22</b>
Repair & Maintenance	0.17
Employee Cost	20.61
A & G Expenses	9.57
Depreciation	0.22
<b>Total</b>	<b>30.57</b>

KPTCL requests the Hon'ble Commission to allow the actual SLDC expenditure of Rs. 30.57 Crore for FY-22 for recovery from ESCOMs.

KPTCL also requests the Hon'ble commission to revise SLDC charges to be recovered from short term open access customers.

## CHAPTER – 7

### 7.0 Annual Revenue Requirement of KPTCL

#### 7.1 Annual Revenue Requirement of KPTCL for FY-22 (as per Actuals):

The revised annual revenue requirement of KPTCL for FY-22 based on Audited Accounts for FY-22 are furnished in the following tables:

**Table- 23**

#### Annual Revenue Requirement of KPTCL for FY-22

(Amount in Rs. Crore)

Particulars	2021-22
Revenue from Transmission of Power	4106.98
Other income	272.59
<b>Total Revenue</b>	<b>4379.57</b>
<b>Expenditure</b>	
Repairs and Maintenance	334.24
Employee Costs	1310.09
A & G Expenses	147.10
Depreciation	1169.27
Finance costs	574.45
Interest on Working Capital	51.99
RoE @ 15.5%	892.64
Exceptional Items	-178.31
Income tax	287.33
Other debits	34.76
<b>Total Expenditure</b>	<b>4623.56</b>
<b>Less</b>	
Interest and finance charges capitalized	111.34
Other expenses capitalized	68.62
Other income	272.59
<b>Net ARR</b>	<b>4171.01</b>
<b>Revenue Gap (4171.01-4106.98)</b>	<b>64.03</b>



## 7.2 Over all Gap for inclusion in Tariff for FY-23

(Amount in Rs. Crore)

Revenue Gap as per APR FY-22.	64.03
<b>Add:</b> Amount disallowed in respect of works which were identified as imprudent for FY 20 and FY21, which are now prudent. (Rs.1.51Cr.+Rs.3.82 Crs.)	5.33
<b>Add:</b> Consequent to G.O. dated 15.11.2022 and corrigendum dated 24.11.2022, the Additional Employee cost towards GoK portion of Pension and Gratuity Expenditure a) Towards Arrears of FY 21-22 To FY 22-23 to be collected in three equal instalments ie., (Rs.3,357.27 Cr./3)= 1,117.76 Cr. <b>PLUS</b> b) Towards estimated contribution for FY 2023-24 – Rs. 1616.34 Crs.	2734.10
<b>Overall Amount Claimed</b>	<b>2803.46</b>

## 7.3 Recovery of Transmission Charges:

KPTCL is placing its actual transmission costs with a request to approve the same in the foregoing paragraphs. KPTCL has furnished details of various costs. KPTCL respectfully submits before this Hon'ble Commission to consider the revenue requirement which is based on the Audited Annual Accounts for FY-22.

## 7.4 Recovery of Short Term Open Access Charges:

Hon'ble Commission is requested to revise the Short Term Open Access Charges for FY-23, considering the revenue gap of FY-22.

## 7.5 Revenue from Transmission Charges:

As KPTCL is involved only in Transmission Activity with effect from 10<sup>th</sup> June 2005, its revenues are mainly from transmission charges and Open access charges. Total Revenue indicated includes revenue from transmission charges, open access charges and non-tariff income.

## 7.6 Revenue Account:

The income from Transmission charges of KPTCL was not enough to cover its costs to an extent of Rs.64.03 Cr. KPTCL requests the Hon'ble Commission to consider the ARR, as per Audited Accounts and allow KPTCL to recover the actual ARR and Additional Employee cost towards Pension and Gratuity Contribution of

**Rs. 2734.10 Cr** as per the direction by Government of Karnataka vide its Order dated 15.11.2022 and corrigendum dated 24.11.2022.

The following table provides the details of Revenue Account for FY 22.

**Table-24**  
**REVENUE ACCOUNT**  
(Amount in Rs. Crore)

1. Revenue from Transmission of power	4106.98
2. Net ARR as per Audited Accounts	4171.01
<b>Revenue deficit for FY-22 (2-1)</b>	<b>64.03</b>
<b>Add:</b> Amount disallowed in respect of works which were identified as imprudent for FY 20 and FY 21, which are now prudent.(Rs.1.51Crs.+Rs.3.82 Crs.)	5.33

<p><b>Add:</b> Consequent to G.O. dated 15.11.2022 and corrigendum dated 24.11.2022, Additional Employee cost towards GoK portion of Pension and Gratuity Expenditure</p> <p>a) Towards Arrears from FY 21-22 To FY 22-23 to be collected in three equal instalments ie., (Rs.3,357.27 Cr./3)= 1,117.76 Cr.</p> <p><b>PLUS</b></p> <p>b) Amount towards estimated contribution for FY 2023-24 – Rs. 1616.34 Crs.</p>	2734.10
<b>Overall Amount Claimed</b>	<b>2803.46</b>

KPTCL requests the Hon'ble Commission to approve the overall amount of **Rs. 2803.46 Cr.** to be recovered from ESCOMs along with the already approved ARR for FY-24.

### 7.7 Sharing Efficiency gains and losses:

KPTCL requests the Hon'ble Commission to provide incentive for achieving system availability better than the targeted availability. Sharing of gains may be allowed in accordance with MYT Regulation 2.7.6 and as per the Tariff Orders issued by the Commission from time to time.

## 8.0 PRAYER

KPTCL respectfully prays the Hon'ble Commission to consider and approve the following:-

- a) The Actual ARR of KPTCL for FY-22 based on the Audited Annual Accounts and to allow efficiency gains.
- b) To allow recovery of overall amount of **Rs. 2803.46 Cr.** claimed (Rs. 64.03 Cr.+Rs.5.33 Cr+ Rs. 2734.10 Cr.) from ESCOMs w.e.f 01.04.2023, along with approved transmission charges.
- c) To modify the short term open access charges to be recovered from 01.04.2023, duly considering the revenue gap of FY22.
- d) To allow recovery of actual SLDC charges of **Rs. 30.57 Cr.** and to revise the SLDC charges to be recovered from STOA customers.

**For KPTCL,**

**Financial Advisor,  
(Regulatory Affairs)  
Kaveri Bhavan,  
Bangalore.**