

ARUNACHAL PRADESH STATE ELECTRICITY REGULATORY COMMISSION (APSERC)

Determination of Tariff for 24 MW Dikshi Small Hydro- Electric Projects

For

Devi Energies Private Limited

351, Rupa Village & Town PO & PS Rupa, West Kameng District,

Arunachal Pradesh

Issued on 20/12/2019

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Abbreviations

Abbreviation	Description	
ACT	Electricity Act, 2003	
APSERC	Arunachal Pradesh State Electricity Regulatory Commission	
CEA	Central Electricity Authority	
CERC	Central Electricity Regulatory Commission	
Cr./ Crs	Crore/ Crores	
DEPL	Devi Energies Pvt.Ltd	
D/E	Debt Equity	
DOP, AP	Department of Power, Govt. of Arunachal Pradesh	
E&M	Electro-Mechanical	
FC	Financial Charges	
FY	Financial Year	
HEP	Hydro Electric Project	
IDC	Interest During Construction	
kV	Kilovolt	
kVA	Kilo Volt Amps	
kWh	Kilo Watt Hour	
MU	Million Units	
MVA	Million Volt Amps	
MW	Mega Watt	
O&M	Operation & Maintenance	
ROE	Return on Equity	
Rs.	Rupees	
SS	Sub Station	
SBI	State Bank of India	
SBI-PLR	State Bank of India- Prime Lending Rate (Short Term)	

SBI-MCLR	State Bank of India- Marginal Cost Lending Rate			
SHP	Small Hydro Plant			
SERC	State Electricity Regulatory Commission			
TEC	Techno Economic Clearance			

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Before

The Arunachal Pradesh State Electricity Regulatory Commission (APSERC)

Itanagar, Arunachal Pradesh

Petition No. TP - 06 of 2018

In the matter of:

Determination of Tariff for Dikshi Small Hydro- Electric Projects of 24 MW from proposed date of commercial operation (COD) as per Arunachal Pradesh state electricity regulatory Commission (Terms and Conditions for tariff determination from Renewable energy source) Regulation, 2018 for a period of 35 years.

AND

M/s Devi Energies Pvt. Ltd. (DEPL)

351, Rupa Village & Town PO & PS Rupa,

West Kameng District,

Arunachal Pradesh-----Petitioner

VS

Department of Power (DOP),

Govt. of Arunachal Pradesh. Itanagar -----Respondent

Present:

R. P. Singh, Chairman

ORDER

(Passed on 20-12-2019)

The Commission in exercise of the powers vested in it under section 62 (1) (a) read with Section 62 (3) and Section 64 (3) (a) of the Electricity Act, 2003 and Arunachal Pradesh State Electricity Regulatory Commission (APSERC) RE Regulations, 2018 and other enabling provisions in this behalf, hereby issues this order, approval of capital cost of the projects

and determination of generation tariff for 35 years for supply of power to Department of

Power, Govt. of Arunachal Pradesh for distribution in the State of Arunachal Pradesh. The

relevant Regulation of the Commission requires that the generating company shall file tariff

with the Commission for approval of capital cost and fixation of tariff complete in all

respects, along with requisite fee as prescribed in the Commission's Fee, Regulations, (1st

amendments) 2017 3 month in advance of date of Commissioning of the project or

Commissioning of the 1st unit in case of multiple unit or one month after the date of issuance

of these Regulation, whichever is later. Accordingly, the tariff petition have been filed by

the DEPL (the deemed generating company) on 2nd December 2018.

This order consists of four chapters, which include detailed analysis of the capital cost,

approved Generation Tariff for 35 years.

This order shall be effective from COD i.e. 19th September 2019 and shall remain in force for

35 years.

Place: Itanagar

Chairperson, APSERC

Secretary

1. INTRODUCTION

1.1 ARUNACHAL PRADESH STATE ELECTRICITY REGULATORY COMMISSION

In exercise of the powers conferred by the Electricity Act, 2003, (hereinafter referred to as Act) the Government of Arunachal Pradesh constituted the Electricity Regulatory Commission for the State of Arunachal Pradesh to be known as "Arunachal Pradesh State Electricity Regulatory Commission" (APSERC) as notified on 07.05.2010 (hereinafter referred to as Commission). The Commission so constituted is a one-member body to function as an autonomous authority responsible for Regulation of the power sector in the State of Arunachal Pradesh. The powers and functions of the Commission are such as prescribed in the Act. The office of the Commission is presently located at Itanagar, Arunachal Pradesh. The Commission started functioning with effect from 02.03.2011 with the objectives and purposes for which it has been established.

In accordance with the provisions of the Act, the Commission discharges the following functions:

- a) Determines the Tariff for generation, supply, transmission and wheeling of electricity, wholesale, bulk or retail, as the case may be, within the State; provided that where open access has been permitted to a category of consumers under Section 42, the State Commission shall determine only the wheeling charges and surcharge thereon, if any, for the said category of consumers.
- b) Regulates Electricity purchase and procurement process of distribution licensees including the price at which electricity shall be procured from the generating companies or licensees or from other sources through agreements for purchase of power for distribution and supply within the State.
- c) Facilitates Intra-State transmission and wheeling of electricity.
- d) Issues licenses to persons seeking to act as transmission licensees, distribution licensees and electricity traders with respect to their operations within the State.
- e) Promotes co-generation and generation of electricity from renewable sources of energy by providing suitable measures for connectivity with the grid and sale of electricity to any person, and specify, for purchase of electricity from such sources, a percentage of the total consumption of electricity in the area of a distribution licensee.

- f) Adjudicates upon the disputes between the licensees and generating companies; and to refer any dispute for arbitration.
- g) Levies fee for the purpose of the Act.
- h) Specifies State Grid Code consistent with the Indian Electricity Grid Code (IEGC) standards specified under clause (h) of sub-section (1) section 79 of EA-2003.
- i) Specifies and enforce standards with respect to quality, continuity, and reliability of services by licensees.
- j) Fixes the trading margin in the Intra-State trading of electricity, if considered, necessary.
- k) Discharges such other functions as may be assigned to it under the EA-2003.
- I) Under takes promotion of energy efficiency.
- (1) Further, the Commission also advises the State Government on all or any of the following matters namely:
 - a) Promotion of competition, efficiency, and economy in activities of the electricity industry.
 - b) Promotion of investment in electricity industry.
 - c) Reorganization and restructuring of electricity industry in the State.
 - d) Matters concerning generation, transmission, distribution and trading of electricity or any other matter referred to the State Commission by the State Government.
- (2) The Commission ensures transparency while exercising its powers and discharging its functions.
- (3) In discharge of its functions, the Commission is guided by the National Tariff Policy (NTP) brought out by GOI in compliance with Section 3 of the Act. The objectives of the NTP are to:
 - a) Ensure availability of electricity to consumers at reasonable and competitive rates.
 - b) Ensure financial viability of the sector and attract investments.
 - c) Promote transparency, consistency, and predictability in regulatory approaches across jurisdictions and minimize perceptions of regulatory risks.
 - d) Promote competition, efficiency in operation and improvement in quality of supply.
- (4) The Commission has so far notified the following Regulations to facilitate its functioning.
- 1. State Advisory Committee (SAC) Notification 2011.



- 2. Conduct of Business Regulations- 2011.
- 3. Redressal of Grievances and Ombudsman Regulations 2011.
- 4. Fee Regulations-2011.
- 5. Grant of Intra State Trading License Regulations-2011.
- Terms and Conditions for Determining of Tariff and Formats for Tariff Filing Regulations
 2011.
- 7. Renewable Power Purchase Obligations and its Compliance Regulations 2012. (Repealed).
- 8. Renewable Power Purchase Obligation and Its Compliance Regulations 2012.
- 9. Redressal of Grievances & Ombudsman Regulation (1st Amendment) 2012.
- 10. State Grid Code Regulations 2012.
- 11. Terms and Conditions of Intra-State Open Access Regulations-2012.
- 12. Electricity Supply Code Regulation-2013.
- 13. Reconstitution of the State Advisory Committee-2013.
- 14. Multi Year Tariff Regulation 2013.
- 15. Service Conditions of Staff Regulations-2015.
- 16. Consumer Grievances Redressal Forum and Ombudsman Regulation, 2015.
- 17. Standards of Performance for the Distribution Licensee Regulation-2016.
- 18. Renewable Power Purchase Obligation and its Compliance Regulation (1stAmendment) 2016.
- Renewable Power Purchase Obligation and its Compliance Regulation (2ndAmendment)
 2016.
- 20. Rooftop Solar Grid Interactive Based on Net Metering Regulation -2016.
- 21. Appointment of Consultants Regulations-2017.
- 22. Terms and Conditions for Tariff Determination from Renewable Energy Sources
 Regulation 2012 (1stAmmendment) 2017(Repealed).
- 23. Payment of Fees Regulation (1st Amendment) 2017.
- 24. Procedure, Terms and Conditions for grant of Transmission Licence and other related matters Regulations, 2017.
- 25. Terms and Conditions for Tariff Determination from Renewable Energy Sources Regulations-2018.
- 26. Appointment of Consultants Regulations, 2018.

27. State Grid Code Regulations, 2018.

28. Service Conditions of Staff Regulations, 2018.

29. Consumer Grievances Redressal Forum and Ombudsman Regulations (First

Amendment)-2018.

30. Multi Year Tariff Regulations-2018.

1.2 ARUNACHAL PRADESH - GEOGRAPHICAL REALITY

The total area of the State of Arunachal Pradesh is 83573 sq.kms. The State is having a

population of around 13.82 lakhs (2011 Census). The State of Arunachal Pradesh is

bounded by Assam in South, Bhutan in West, China in North, and Nagaland and

Myanmar in East. It's Capital, Itanagar is about 380 kms from Guwahati.

1.3 DEVI ENERGIES PRIVATE LIMITED (DEPL)

Devi Energies Private Limited is a company having registered office at Rupa village &

Town PO & PS Rupa, West Kameng District, Arunachal Pradesh is specialized in

development of Hydroelectric Power projects.

Devi Energies Private Limited entered into Memorandum of Agreement (MoA) with

Government of Arunachal Pradesh on 11.03.2011 for execution of Dikshi SHEP (24MW)

on BOOT basis. Dikshi Small Hydro Electric Project (24 MW) located in West Kameng

district of Arunachal Pradesh, envisages utilization of waters of the river Phudung, a

tributary of Tenga river. The project envisages utilization of 24.16 cumec discharge and

maximum gross head of 121 m (Net head 113.53 m) corresponding to an installed

capacity of 24 MW.

Devi Energies Private Limited has successfully Commissioned 24 MW Dikshi SHEP on

19.09.2019.

1.4 TARIFF PETITION: FILING

Devi Energies Private Limited has filed the tariff Petition for 24 MW Dikshi SHEP for 35

years on dated 02.12.2018.

In the petition, DEPL has proposed following as levelized Tariff of Rs 6.35/ kWh based

on cost of project of Rs 35196.96 Lakhs and net generation 93.66 MUs of the hydro

plant for 35 years.

1.5 ADMISSION OF PETITION AND PUBLIC HEARING PROCESS

The Commission observed that:

- (1) The Petition was submitted in line with APSERC (Terms and Conditions for Tariff Determination from Renewable Energy Source) Regulation 2018, Notified on 21st May, 2018.
- (2) The Petitioner has deposited the requisite Petition fee in line with Schedule of the Fees prescribed under the Commission's Fee Regulations 1st amendment 2017, No. APSERC/NOTIFICATION/24/2017 dated 31st March,2017.
- (3) The Petition filed by the Petitioner lacked in many requisite data. The Commission however admitted the Petition on dated 18/12/2018 and numbered it as Petition no TP-06 of 2018 in line with Regulation 16(13) "Presentation, Scrutiny and Admission of the Petitions" of the Arunachal Pradesh State Electricity Regulatory Commission (Conduct of Business Regulations 2011).

2. PETITION'S SUMMARY FOR APPROVAL OF CAPITAL COST & TARIFF DETERMINATION

2.1 BACKGROUND

DEPL has filed the tariff petition of 24 MW Dikshi SHEP along with it has submitted the

details of various expenses that constitute the fixed cost for determination of tariff. The

details are given in the following paras in this chapter.

2.2 CAPITAL COST - PETITIONER'S SUBMISSION

The Petitioner submitted the Capital cost of the Hydro power plants as per Regulation

12 of APSERC (Terms & Conditions for Tariff Determination from Renewable Energy

Sources) Regulations, 2018.

The Petitioner has submitted capital cost of Rs 35196.96 lakhs including Interest during

construction and financing charges till COD i.e 19th September 2019.

2.3 INTEREST ON LOAN-PETITIONER'S SUBMISSION

The Petitioner submitted that the Project cost of the HEPs has been funded by the

Financial Institutes. In view of the above, interest on loan has been claimed. DEPL

submits that it will claim interest on loan in accordance with the APSERC RE Regulation,

2018.

As per Regulation 14 of APSERC RE Regulation 2018, the following parameters are

considered.

1. Loan amount: - 70 % of the project

2. Loan period: - 13 years

3. Moratorium period: - 0 months

4. Rate of interest:- 10.41 %

Interest rate considered is 200 basis points above the average State Bank of India MCLR

(marginal cost lending rate- one year tenor) prevalent during the last available 6

months.

2.4 DEPRECIATION- PETITIONER'S SUBMISSION

The Petitioner has submitted that depreciation for the project has been considered @

5.28% for first 13 years and @ 0.97% from 14th year till 35th year, considering salvage

value as 10 % as per Regulation 15 of APSERC RE Regulation, 2018.

2.5 RETURN ON EQUITY (ROE) - PETITIONER'S SUBMISSION

The Petitioner submitted ROE as per provision under Regulation 16 of APSERC RE

Regulations, 2018 considered @ 14% per annum grossed up by MAT as on 1st April of

previous year. Accordingly, ROE has been considered @ 17.56%.

The equity for the purpose of calculation of ROE has been computed as per Regulation

13 of APSERC RE Regulations, 2018.

Accordingly, Debt-Equity ratio of 70:30 has been considered as per Regulation 13 of

APSERC RE Regulations, 2018 for determination of tariff.

2.6 O&M EXPENSES – PETITIONER'S SUBMISSION

The Petitioner submitted O&M expenses as per Regulation 19 of APSERC RE

Regulations, 2018 that provides normative O&M for SHPs as Rs. 28.54 Lakh/MW for the

base year of 2018-19. The Regulation further provides an escalation @ 5.72% per

annum on the above normative O&M for subsequent years.

2.7 INTEREST ON WORKING CAPITAL - PETITIONER'S SUBMISSION

The Petitioner submitted interest on Working Capital as per Regulation 17 of APSERC

RE Regulations, 2018. Interest @ 11.41 % per annum on working capital has been

considered as 300 basis points above the SBI MCLR (One year tenor) for last six months.

1. Operation & Maintenance expenses for one month;

2. Receivables equivalent to 2 months of energy charges for sale of electricity;

3. Maintenance spares @ 15% of O &M expense.

2.8 SUBSIDY & INCENTIVE BY CENTRAL/ STATE GOVT- PETITIONER'S SUBMISSION

As per MNRE circular dated 02.07.2014, a capital subsidy @ Rs 1.5 Crores per MW with

ceiling of Rs 5 Crore will be granted for small hydro projects upto 25 MW. The amount

has been reduced in debt for calculations of tariff for the project.

2.9 AUXILIARY CONSUMPTION- PETITIONER'S SUBMISSION

As per Regulation 28 of APSERC Regulation 2018, normative auxiliary consumption

factor is taken @ 1% of net CUF.

2.10 FIXED COSTS CLAIMED - PETITIONER'S SUBMISSION

Summary of Petitioner is provided in Annexure-A

2.11 INDICATIVE TARIFF - PETITIONER'S SUBMISSION

The Petitioner submitted levelized tariff considering 45 % CUF net of free power as Rs 6.35/Kwh.

2.12 PETITIONER'S PRAYER

The Petitioner requested the Commission to:

- 1. Approve the capital cost of the project;
- 2. Approve the proposed levelised tariff;
- 3. Elaborate Must Run clause so as to avoid future dispute, if any.

3. COMMISSION ANALYSIS: APPROVAL OF CAPITAL COST & TARIFF

3.1 GENERAL

DEPL has filed the petition dated 02.12.2018 for determination of Tariff of their 24 MW Dikshi Generating Stations as per APSERC (Terms and condition for determination of Tariff from Renewable Energy Source), 2018 from the date of Commissioning for 35 years.

The petition was published in abridged form on dated 23.03.2019 in local newspapers and also placed on Commission's website for public response and suggestions. The Commission did not receive any comments/suggestions so far.

The Commission has found discrepancies in the data provided and asked for the clarification and additional documents during the scrutiny for approval of capital cost and tariff determination.

In the meantime, the petitioner had requested the Commission for the grant of provisional tariff till all the documents/ information are furnished. The Commission has granted provisional tariff vide order dated 30.09.2019 based on records/ information available with it. Considering the CERC norms, the Commission has granted a provisional tariff of Rs 4.41 kWh which will be applicable till the determination of final tariff.

The petitioner has submitted additional data and confirmed the commercial date of operation to be 19.09.2019 vide certificate no. CE (P)/ WEZ/ COM-3 (4)/PPA/PP/2019-20/4854-65 dated 30.09.2019.

On 18.11.2019, hearing was held in the Commission court room where members of Devi Energies and Department of Power, Govt. of Arunachal Pradesh were present.

The respondent, Department of power Vide letter no. CEP/WEZ/ COM 3(4)/2019-20/7092-96 dated 15.11.2019 has requested the Commission to extend the date of hearing due to absence of documents with them.

As per the request made by respondent, the Commission decided for next hearing and fixed the next date of hearing on 11.12.2019. The Commission also directed Respondent that no further extension of dates shall be allowed and suo-motu order will be issued.

The Commission has approved capital cost and determined tariff as per Regulation (7) & (8) of APSERC RE Regulation, 2018 as amended from time to time after detailed scrutiny and considering reasonable, logical, acceptable facts presented by petitioner.

3.2 ASSUMPTIONS FOR TARIFF PETITION ANALYSIS.

The Commission considered the following assumption for tariff analysis.

Table 1: The Assumptions considered for Tariff Petition Analysis

SI. No.	Particulars	Unit	Value	Remarks
1	Auxiliary Consumption	%	1	As per APSERC RE Regulation, 2018
2	O&M Expenses	Lakhs/ MW	28.54	Escalation @5.72% as per APSERC RE Regulation, 2018
3	Depreciation	%	5.28%	For 13 years as per APSERC RE Regulation, 2018
4	Plant Life	Years	35	As per APSERC RE Regulation, 2018
5	Salvage value	%	10	As per APSERC RE Regulation, 2018
6	Capacity Utilization Factor	%	45	As per APSERC RE Regulation, 2018
7	RoE	%	14	As per APSERC RE Regulation, 2018 and gross up post tax @ 20.46%

8	Interest on working	%	11.41	300 base point above SBI MCLR as
	capital			per APSERC RE Regulation, 2018
10	Interest on Loon	%	10.41	200 base point above SBI MCLR as
	Interest on Loan			per APSERC Regulation, 2018
11	Spares(% of O&M)	%	15	As per APSERC RE Regulation, 2018
12	O&M expenses	Months	1	As per APSERC RE Regulation, 2018
13	Receivables	Months	2	As per APSERC RE Regulation, 2018
14	Debt	%	70	As per APSERC RE Regulation, 2018
15	Equity	%	30	As per APSERC RE Regulation, 2018
16	Loan Period	Years	13	As per APSERC RE Regulation, 2018

3.3 CAPITAL COST – COMMISSION ANALYSIS

The Petitioner has taken the capital expenditure on the project as Rs. 351.96 Crore on the date of commercial operation, i.e., 19.09.2019 which has been supported by the certificate of the Chartered Accountant dated 28.10.2019 for audited actual expenditure, against the TEC approved cost of Rs. 185.40 Crore with Commissioning schedule of 42 months. It is clear that there has been substantial time and cost overrun in the project. The Petitioner has also got additional term loan to meet a part of the cost overrun. The actual capital cost per MW works out to Rs. 14.66 Crore/MW. The details of capital expenditure is as follows:

Table 2: Detailed capital expenditure claimed

SI. No.	Head of Expense	Claimed as per BOQ/ breakup by Petitioner (Rs Crores)
1	Land	3.67
2	Civil cost	235.91
3	E&M cost	37.09
4	Construction and Pre Commissioning expense	5.99
5	Infrastructure, T&P, Establishment, Etc.	6.69
6	Overheads	8.12
7	Capital cost w/o IDC and FC	297.51
8	Interest During Construction (IDC)	52.63

9	Financing charges (FC)	1.86
10	Capital cost with IDC and FC	351.96

Commission during scrutiny of the petition has found that project components was changed, trench weir from barrage, free flow head race tunnel from pressurized head race tunnel forebay from surge shaft, partial tail race channel & tail race tunnel from tail race channel.

There was change in size of head race tunnel and penstock. Also location of trench weir, head race tunnel and penstock and powerhouse was changed.

Revised TEC has not been obtained for the change of components nor was geological surprise committee formed for consideration of geological surprises as per the condition of TEC.

There was a major increase in quantities and rates in head race tunnel, forebay, penstock and powerhouse according to the final executed BOQ submitted by the petitioner.

Further, in scrutiny of E&M aspects, switchyard equipment especially transformer was found of higher capacity. Also there was an increase in E&M cost for which breakup was not submitted.

Petitioner during the hearing and through his letters for clarification on comments raised by Commission, gave a briefing on the project background and the difficulties in construction of the project in terms of technical, economical as well as social concerns. According to the petitioner, due to the issues raised by the locals of the area on religious ground the construction of the barrage was not permitted in the Phudung river. In this regard, the developer explained that the barrage had to be abandoned and diversion had to be a trench type weir which doesn't entail any pondage. In order to overcome the loss of head, the location of the trench weir was suitably shifted upstream.

Petitioner also added that similar problem was faced for powerhouse, again on local resistance for the originally conceived location resulting in relocation of the powerhouse and corresponding changes in the trail race structure. Also, 250 m long tunnel plus open channel had to be constructed to release the water back into the river, instead of the 75 m long open channel only.

APSERC order on Tariff Petition of 24 MW Dikshi HEP of Devi Energies Pvt. Ltd.

The tunnel size originally envisaged was D type of 3.7m x 3.3m which had to be

increased for ease of construction to 5.10 m x 4.6 m. There was huge over break during

the tunnelling due to weak geology of the area. He further added that instead of 10 %

over break generally allowed in the contract, the actual over break was about 37 %. This

resulted into increase of cost and completion time of the project.

In justification of the increase in completion cost of the project amounting to Rs. 351.96

Crores i.e Rs 14.66 Crore per MW, the factor such as weak geology of the area,

landslides, floods and also unfortunate death in the tunnelling process, a major crown

collapse during excavation. This also resulted into increase in completion time of the

project as per petitioner.

According to the developer they had to construct 20 km road for access to the site and

also arrange construction power from DG sets due to non-availability of electric supply

from the state grid. The cost of diesel power comes to around Rs.20 per unit, which is

almost 5 times the cost of electricity. Also non-availability of skilled labours in the area

was a factor in cost escalation. Remoteness (the nearest markets located at Guwahati,

Silliguri and Kolkata) factor also affected the cost of completion and also in time for

completion much more than what was anticipated at planning stage.

Delay in grant of clearance from NEEPCO to DOP for allowing connectivity for 132-KV

Dikshi-Tenga-Nechipu line to connect to NEEPCO line. Though transmission line and

switching station are ready for synchronization and Commissioning by 1st week of May

2019, permission for connectivity to NEEPCO line has been accorded in last week of

Aug'19.

The Commissioner (Power) informed the Hon'ble Commission that the tariff sought as

Rs. 6.34 per unit is very high. In support of his plea, he informed the Commission that

DOP is charging at an average rate of Rs.3.35 per unit from its consumers and Arunachal

Pradesh doesn't have internal revenues to cover this gap. He further submitted that the

approved TEC was of Rs.185 Crores and revised approval for the same was not sought

by the developer.

The Commissioner (Power) commented that the reason for increase in cost such as

floods, landslides, remoteness availability of skilled labour are not maintained as these

factor should have been known and accounted for at the planning stage itself.

The Commission after considering the petitioner's submissions, briefing during hearing and respondent's submissions has approved the capital cost of the 24 MW Dikshi SHEP as Rs 231.42 Crores without IDC and FC on following basis:

- 1. The Commission considered the reasons given for changes in components and their location and finds the reasons given technically and logically acceptable.
- 2. Project was monitored by Chief Engineer (Monitoring) through AE, Civil- DHPD and no observations on changes were made.
- 3. There was no observation by the Commissioner (Power) on the letter submitted by petitioner on change of scope and cost of the project components in February 2018.
- 4. According to petitioner, senior Geological experts were not readily available to visit such remote locations therefore; no geological surprise committee can be formed. Petitioner's explanation on this point seems logical in practice.
- 5. The Commission has considered the contract awarded rates and subsequently negotiated rates and accepted the lower of the two.
- 6. Also, Commission has allowed a price variation of 2.7 % on the rates with respect to the increase in labour rates. The Commission has found that during the construction period rates has increased approx. 9 % and they approximately comprises 30 % of the rate.
- 7. Fuel charges have not gone up during the period of construction, hence no variation is allowed for the fuel charges.
- 8. The quantities varying unreasonably with the construction drawings have been limited to the extent those are reasonable and acceptable. Quantities of excavation and lining has been adjusted as per drawings submitted and granted.
- An over break of 25 % allowed keeping in view of the rock strata- class IV and class
 This is 15 % in addition to standard norms and TEC permitted overbreak due to poor geological conditions.
- 10. As per petitioner increase in cost is also due to increase in price of steel, cement and aggregate. This has been accepted and price variation in cement, steel and aggregates has been allowed Rs. 7.01 Crores as claimed. However, allowing for price variation rules out escalation in the contract agreement rates for steel, cement and aggregates.

11. Difference amount in restoration of flood damage works (1, 2 and 3) and insurance claim settled (1 & 2) has been disallowed as it might have been considered unrelated or infructuous to the restoration by the insurance company. The developer claimed Rs 9.28 Crores against the damages and received Rs 2.76 Crores against the claim from the insurance company. No further details in support of his claim having being reasonable and yet rejected by insurance company is submitted, hence cannot be granted.

Flood Details	Claimed (Rs.in lacs)	Received(Rs. in lacs)
Flood-1	195.28	115.18
Flood-2	395.57	161.46
Flood-3	337.42	0
Total	928.27	276.64

12. E&M cost as submitted vide original petition Rs 31.87 Crore is considered and accepted as per documents (tender and cost breakup) submitted. As no details are provided for the increased cost of Rs 37.09 Crores.

The detailed costing of civil works is tabulated at Annexure-B.

The detailed costing of E&M works is tabulated at Annexure-C

3.3.1 TIME OVER RUN- COMMISSION ANALYSIS

TEC for the project was given on date 10.06.2013, date of signing of agreement for civil and HM works is 06.08.2014. A period of one year has been given in TEC for preconstruction activities and other clearances. However, the time taken by the developer for award of contract since TEC is 14 months, which is more than the 12 months' preconstruction period.

The financial sanctions of the project from IREDA was partly done on 04.08.2014. Actual date submitted to Commission is July 2015 for full sanction.

Considering Zero date of project execution as July 2015, the anticipated date of completion shall be December 2017, considering a 30 months of execution period. Actual completion is in 1st week of May 2019. Thus total delay in the project is 20 Months.

Considering the effect of climatic conditions, floods, geological reasons, local factors and other logistical factors and connectivity approval, a period of 13 months as claimed seems to be justified and can be considered for time over run.

However, certain factors affecting delay stated during the hearing dated 11.12.2019 by DEPL team were submitted which the Commission finds acceptable for additional time overrun of 7 months. These factors are:

- 1. Cavity formation- A period of 2 months is allowed as a reasonable time for overcoming these events of cavity formation at multiple locations.
- 2. Huge overbreak- 37 %- This has resulted in increase in backfill quantities and time extension. Though we have allowed time extension for overbreak but excess quantities could have been controlled and therefore 15 % of the overbreak in excess of 10 % has been considered against 37 % claimed, a period of 2 months is allowed.
- 3. The change in location of the weir and powerhouse based on social and religious concerns have resulted in delay of construction activity by 3 months has been allowed.

Thus, Commission does not find any reason for penalizing developer on ground of time over run.

3.3.2 FINANCING CHARGES- COMMISSION ANALYSIS

Combined loan was taken for HEP and Transmission system. Financial Charges for entire loan is Rs. 186.29 Lakhs or Rs 1.86 Crores. Thus Rs 1.86 Crores should be apportion between HEP & Transmission. The Financial Charges for the project comes out to be Rs 1.63 Crores, considering the Financing charges of Rs 0.23 Crores claimed for the transmission system.

3.3.3 INTEREST DURING CONSTRUCTION- COMMISSION ANALYSIS

- 1. Actual IDC is calculated on prorate basis as combined loan is disbursed for the HEP and transmission.
- 2. IDC claimed till March 2018- Rs 33.05 Crores.
- 3. IDC claimed from April 2018 to Dec 2018- Rs 3.99 Crores.
- 4. IDC claimed from Jan 2019 till COD- Rs 15.59 Crores.
- 5. Total IDC is Rs 52.63 Crores.

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- 6. IDC acceptable is Rs 41.78 Crores (77.79 % of IDC claimed- percentage of the hard cost Rs 231.42 Crores accepted).
- 7. The IDC accepted by Commission has been restricted to the hard cost admitted and not as claimed.

3.3.4 DETAIL OF CAPITAL EXPENDITURE APPROVED IS AS FOLLOWS:

Table 3: Detail of capital expenditure approved

SI.	Head of	Claimed as per	Cost allowed	Remarks
No.	Expense	BOQ/ breakup	by APSERC	
		by Petitioner	(Rs Crores)	·
		(Rs Crores)		
1	Land	3.67	3.67	As per documents submitted
2	Civil cost	235.91	182.78	As per comments above and Annexure B
3	E&M cost	37.09	31.87	As per comments above and Annexure C
4	Construction and Pre Commissioning expense	5.99	-	Already included in E&M cost as they are part of E&M cost- Annexure C
5	Infrastructure, T&P, Establishment, Etc.	6.69	6.55	These expenses are shared by the developer & contractor in the total cost of the project. The owner generally takes cares of licenses, communication system, office and office equipment, etc. which justifies allocation of 3 % of the project cost for this head
6	Overheads	8.12	6.55	The overhead expenses are shared by the developer & contractor in the total cost of the project. The owner generally takes cares statutory visits, design experts &

				owner supervision which justifies allocation of 3 % of the project cost for this head
7	Capital cost w/o IDC and FC	297.51	231.42	
8	Interest During Construction (IDC)	52.63	41.78	(77.79% of IDC claimed- percentage of the hard cost Rs 274.831 accepted)
9	Financing charges (FC)	1.86	1.63	Rs 0.23 Crs is claimed in transmission cost
10	Capital cost with IDC and FC	351.96	274.831	

3.4. DEPRECIATION - COMMISSION ANALYSIS

The Commission has considered the rate of depreciation @ 5.28 % for 13 years and @ 0.97 % from 14th year till 35th year (as per APSERC RE Regulation, 2018). Salvage value is considered as 10 %. The total depreciation allowed during the project life comes out to be Rs. 242.85 Crores.

The seven months has been considered in the first year for calculation of depreciation amount.

The Commission has estimated the year wise depreciation in Annexure D.

3.5. O&M EXPENSES - COMMISSION ANALYSIS

The Commission allowed the operation and maintenance costs considering the normative rate as Rs 28.54 Lakhs per MW with per annum escalation @ 5.72 % (for plants above 5 MW upto 25 MW) as per APSERC (Terms and Conditions for Tariff Determination from Renewable Energy Sources) Regulations-2018.

The generator has calculated O&M expense for the first year by considering seven months of FY 2019-2020 & 5 months of FY 2020-2021.

The Commission in a view to allow O&M costs for seven months for FY 2019-2020 considering FY 2019-2020 as first year of operations in accordance with APSERC RE Regulation, 2018 and hence approved the O&M cost during the project life as shown in Annexure D.

3.6. RETURN ON EQUITY - COMMISSION ANALYSIS

DEPL has submitted the ROE considering normative capital cost and Debt: Equity ratio as 70:30 that comes out to be:

Total Project Cost (Rs Crores)	351.96
Equity @ 30% (Rs Crores)	105.99
Debt @ 70% (Rs Crores)	241.37
Subsidy (deducted in debt) (Rs Crores)	5

The Commission however allowed the ROE as per the capital cost allowed i.e Rs 274.83 Crores that comes out to be:

Total Project Cost (Rs Crores)	274.83
Equity @ 30% (Rs Crores)	82.449
Debt @ 70% (Rs Crores)	187.38
Subsidy (deducted in debt) (Rs Crores)	5

The Commission has not considered any addition of equity for capitalized works, and therefore, approved the Return on Equity in accordance with APSERC RE Regulation, 2018 @ 17.60 % (considering MAT as on 1st April 2018).

The seven months has been considered in the first year for calculation of ROE amount.

Hence approved the ROE during the project life as shown in Annexure D.

3.7. INTEREST ON LOAN CAPITAL - COMMISSION ANALYSIS

The Commission has considered following norms as per the APSERC RE Regulation 2018 for computation of interest on loan capital:

1. Loan amount: 70% of the project cost

2. Loan period: 12 years

3. Moratorium: 0 months

4. Rate of interest-10.41%

Rate of interest is 200 basis points above the average State Bank of India MCLR

(marginal cost lending rate- one year tenor) prevalent during the last available 6 months.

The seven months has been considered in the first year for calculation of Interest on

loan amount.

Hence approved the interest on loan during the project life as shown in annexure D.

3.8. INTEREST ON WORKING CAPITAL – COMMISSION ANALYSIS

The Commission has computed Interest on working capital as per APSERC RE

Regulations, 2018 according to which the working capital for SHPs would be sum total

of:

1. O&M expenses for one month.

2. Maintenance spares @15% of O&M expenses.

3. Receivables equivalent to two months of energy charges for sale of electricity

calculated on the normative Capacity Utilization Factor

Interest on Working Capital shall be at interest rate equivalent to the normative

interest rate of three hundred (300) basis points above the average State Bank of India

MCLR (One Year Tenor) prevalent during the last available six months for the

determination of tariff.

The seven months has been considered in the first year for calculation of Interest on

working capital amount.

The Commission approved Interest on Working Capital during the project life as

shown in annexure D.

3.9. DISCOUNTING FACTOR

The discounting factor considered is equal to the post tax weighted average cost of

capital on basis of normative debt: equity ratio as per Regulation 2018. The discount

rate works out to be 9.37 %, considering corporate tax of 25 % with 4 % educational

and health cess and 12 % surcharge.

APSERC order on Tariff Petition of 24 MW Dikshi HEP of Devi Energies Pvt. Ltd.

4. HYDRO POWER GENERATION TARIFF - COMMISSION'S ANALYSIS

Regulation 28 of the APSERC Regulation on "The Terms and Conditions for Determining

of Tariff Determination from Renewable Energy Sources - 2018" dated 21.05.2018

specifies the Auxiliary Energy Consumptions Norms of Operation in respect of the Hydro

Plants at 1 % for SHPs.

The Commission in its tariff order has reasonably considered CUF of 45% net of free

power to the state for SHP as per the APSERC RE Regulation 2018.

The net saleable energy after considering CUF and auxiliary consumption comes out to

be 93.66 MUs.

Hence, the Commission approves the generation levellized tariff for Dikshi Small Hydro

Electric Plant for 35 years at 5.25 (Rs/kWh).

The detailed calculation is attached as **annexure D**.

The tariff allowed in this order shall be applicable from the date of commercial

operations of 24 MW Dikshi SHP.

The tariff allowed in the provisional order shall be subject to adjustment.

The plant shall be on MUST Run basis.

This order disposed of petition no TP-06 of 2018.

Place: Itanagar

Chairperson, APSERC

5. Annexures

Annexure - A: ASSUMPTIONS By DEPL

			Date of Commiss	ioning of the Project	19th September, 2019
S. No.	Assumption Head	Sub- Head	Unit	Values	Remarks
1	Power Generation	Installed Power Generation Capacity	MW	24	Project Capacity
		Gross Capacity Utilization Factor	%	45%	As per Regulation
		Auxiliary Consumption	%	1%	As per Regulation
		Gross Annual Generation in 1st Year	%	94.61	As calculated
		Useful Life Years	Years	35	As per Regulation
2a	Project Cost	Power Plant Cost	Rs. Lacs	35196.96	As per details submited in Petition
2b		Cost per MW	Rs.Lacs / MW	1466.54	As calculated
3	Period	Tariff Period	Years	35	As per Regulation
4	Source of Fund	Debt: Equity			
		Debt	%	69.24%	As per Regulation
		Equity	%	30.76%	As per Regulation
		Total Debt Amount	Rs Lacs	24370.46	As calculated
		Total Equity Amount	Rs Lacs	10826.50	As calculated
		Govt Subsidy	Rs Lacs	500.00	Max as per GOI available post COD
		Loan Amount (net of subsidy)	Rs Lacs	23870.46	As calculated
		Moratorium Period	years	0	As per Regulation
		Repayment Period (incl. Moratorium)	years	13	As per Regulation
		Interest Rate	% p.a	10.41%	SBI Base Rate (Av of 6 months) + 200, As per Regulation
		Normative Equity amount @30%	Rs Lacs	10559.09	As calculated
		Return on Equity, Normative	Rs Lacs	14%	As per Regulation
		Return on Equity, Grossed up by MAT	% p.a	17.56%	As per Regulation
5	Financial	Discount Rate	%	9.42%	As per Regulation
	Assumptions	Income Tax	%	29.12%	GOI
		Depreciation			
		Allowed Depreciation	%	90%	As per Regulation
		Depreciation Rate for first 13 years	%	5.28%	As per Regulation
		Depreciation Rate 14th year onwards	%	0.97%	As per Regulation
6	Working Capital	O&M Charges	Months	1	As per Regulation
		Maintenance Spare (% of O&M expenses)		15%	As per Regulation
		Receivables for Debtors	Months	2	As per Regulation
		Interest On Working Capital	% p.a	11.41%	SBI Base Rate (Av of 6 months) + 300, As per Regulation
	Operation & Maintenance	O&M Expenses Per MW (2019- 20)	Rs. Lacs	30.17	As per Regulation for FY 2018-19 (28.54 +escalation)
7	-	O&M Expenses Per MW, 1st Year of operations	Rs. Lacs	31.025	O&M expenses calculated as 194 days for FY 2019- 20 and 172 days of FY 2020-21
		Total O&M Expenses for first year	Rs. Lacs	744.591	As calculated
		Annual Escalation	%	5.72%	As per Regulation
	1				

Levelissed Tariff for 35	Rs/kWh	6.34
Years	KS/K VV II	0.54

Financial Calculations

Units Generation	Unit	Year>	1	2	3	4	5	9	7	∞
Installed Capacity	MW		24	24	24	24	24	24	24	24
Gross Generation	$\Omega \mathbf{W}$		94.61	94.61	94.61	94.61	94.61	94.61	94.61	94.61
Auxiliary Consumption	ПW		0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Net Generation	ПW		93.66	93.66	93.66	93.66	93.66	93.66	93.66	93.66
Fixed Cost	Unit	Year>	Ţ	2	3	4	5	9	7	∞
O&M Expenses	Rs Lakh		744.59	787.18	832.21	879.81	930.14	983.34	1039.59	1099.05
Depreciation	Rs La		1832.00	1832.00	1832.00	1832.00	1832.00	1832.00	1832.00	1832.00
Interest on term loan	Rs Lakh	/	2,416.70	2,223.37	2,030.03	1,836.70	1,643.36	1,450.02	1,256.69	1,063.35
Interest on working Capital	Rs La	<i>\</i>	152.62	150.82	149.13	147.55	146.10	144.79	143.61	142.59
Return on Equity	Rs Lakh	//	1854.18	1854.18	1854.18	1854.18	1854.18	1854.18	1854.18	1854.18
Total Fixed Cost	Rs Lakh		7032.96	877.78	6725.15	6575.21	6428.12	6284.05	6143.15	6005.63
Per Unit Cost of Generation	Unit	Year>	I	2	3	4	2	9	7	∞
O&M expn	Rs/kWh		0.79	0.84	68.0	0.94	66.0	1.05	1.11	1.17
Depreciation	Rs/kWh		1.96	1.96	1.96	1.96	1.96	1.96	1.96	1.96
Int. on term loan	Rs/kWh		2.58	2.37	2.17	1.96	1.75	1.55	1.34	1.14
Int. on working capital	Rs/kWh		0.16	0.16	0.16	0.16	0.16	0.15	0.15	0.15
RoE	Rs/kWh		1.98	1.98	1.98	1.98	1.98	1.98	1.98	1.98
Total COG	Rs/kWh		7.51	7.34	7.18	7.02	98.9	6.71	6.56	6.41
Discount Rate	%	9.42%								
Discount Factor			1	906.0	0.821	0.743	0.673	0.610	0.552	0.500
Discounted Tariff			7.51	9.65	5.90	5.22	4.63	4.10	3.63	3.22
Levellised Tariff for 35 years	Rs/kWh	6.34		2						

Units Generation	Unit	Year>	6	10	- 11	12	13	14	15	16	17
Installed Capacity	MM		24	24	24	24	24	24	24	24	24
Gross Generation	MU		94.61	94.61	94.61	94.61	94.61	94.61	94.61	94.61	94.61
Auxiliary Consumption	MU		0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Net Generation	MU		93.66	93.66	93.66	93.66	93.66	93.66	93.66	93.66	93.66
Fixed Cost	Unit	Year>	6	10	11	12	13	14	15	16	17
O&M Expenses	Rs Lakh		1161.92	1228.38	1298.64	1372.92	1451.45	1534.48	1622.25	1715.04	1813.14
Depreciation	Rs La		1832.00	1832.00	1832.00	1832.00	1832.00	336.88	336.88	336.88	336.88
Interest on term loan	Rs Lakh		870.01	89.929	483.34	290.00	29.96	1	1	1	1
Interest on working Capital	Rs La	1	141.72	141.02	140.49	140.15	140.00	113.15	117.21	121.50	126.04
Return on Equity	Rs Lakh		1854.18	1854.18	1854.18	1854.18	1854.18	1854.18	1854.18	1854.18	1854.18
Total Fixed Cost	Rs Lakh		5871.66	5741.45	5615.22	5493.20	5375.62	3838.68	3930.51	4027.60	4130.23
Per Unit Cost of Generation	Unit	Year>	6	10	11	12	13	14	15	16	17
O&M expn	Rs/kWh		1.24	1.31	1.39	1.47	1.55	1.64	1.73	1.83	1.94
Depreciation	Rs/kWh		1.96	1.96	1.96	1.96	1.96	0.36	0.36	0.36	0.36
Int. on term loan	Rs/kWh		0.93	0.72	0.52	0.31	0.10	0.00	0.00	00.0	0.00
Int. on working capital	Rs/kWh		0.15	0.15	0.15	0.15	0.15	0.12	0.13	0.13	0.13
RoE	Rs/kWh		1.98	1.98	1.98	1.98	1.98	1.98	1.98	1.98	1.98
Total COG	Rs/kWh		6.27	6.13	00.9	5.86	5.74	4.10	4.20	4.30	4.41
Discount Rate	%	9.42%									
Discount Factor			0.453	0.411	0.372	0.337	0.305	0.276	0.250	0.227	0.205
Discounted Tariff			2.85	2.53	2.24	1.98	1.76	1.14	1.06	86.0	0.91
Levellised Tariff for 35 years	Rs/kWh	6.34									

Installed Canacity	CONTRACTOR OF TAXABLE PARTY OF TAXABLE PARTY.		ACCOUNT TO THE PROPERTY OF THE PARTY OF THE	-			1	生見を公司は、八人の後のであるはの機関をは		<u> </u>	
ruscance capacity	MW		24	24	24	24	24	24	24	24	24
Gross Generation	MU		94.61	94.61	94.61	94.61	94.61	94.61	94.61	94.61	94.61
Auxiliary Consumption	MU		0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Net Generation	MU		93.66	93.66	93.66	93.66	93.66	93.66	93.66	93.66	93.66
Fixed Cost	Unit	Year>	18	19	20	21	22	23	24	25	26
O&M Expenses	Rs Lakh		1916.86	2026.50	2142.42	2264.96	2394.52	2531.48	2676.28	2829.37	2991.21
Depreciation	Rs La		336.88	336.88	336.88	336.88	336.88	336.88	336.88	336.88	336.88
Interest on term loan	Rs Lakh		Ţ	1	1	1	1	,	,		1
Interest on working Capital	Rs La		130.83	135.90	141.26	146.93	152.92	159.25	165.94	173.02	180.50
Return on Equity	Rs Lakh	, , ,	1854.18	1854.18	1854.18	1854.18	1854.18	1854.18	1854.18	1854.18	1854.18
Total Fixed Cost	Rs Lakh		4238.74	4353.45	4474.73	4602.94	4738.49	4881.78	5033.28	5193.44	5362.76
Per Unit Cost of Generation	Unit	Year>	81	19	20	21	22	23	24	25	26
O&M expn	Rs/kWh		2.05	2.16	2.29	2.42	2.56	2.70	2.86	3.02	3.19
Depreciation	Rs/kWh		0.36	0.36	0.36	0.36	0.36	0.36	0.36	0.36	0.36
Int. on term loan	Rs/kWh		00.00	0.00	0.00	00.00	0.00	0.00	0.00	0.00	0.00
Int. on working capital	Rs/kWh		0.14	0.15	0.15	0.16	0.16	0.17	0.18	0.18	0.19
RoE	Rs/kWh		1.98	1.98	1.98	1.98	1.98	1.98	1.98	1.98	1.98
Total COG	Rs/kWh		4.53	4.65	4.78	4.91	5.06	5.21	5.37	5.54	5.73
Discount Rate	%	9.42%									
Discount Factor			0.186	0.169	0.153	0.138	0.125	0.114	0.103	0.093	0.084
Discounted Tariff			0.85	0.79	0.74	69.0	0.64	09.0	0.56	0.52	0.49
Levellised Tariff for 35 years	Rs/kWh	6.34									,

Units Generation	Unit	Year>	18	19	20	21	22	23	24	25	26
Installed Capacity	MM		24	24	24	24	24	24	24	24	24
Gross Generation	MU		94.61	94.61	94.61	94.61	94.61	94.61	94.61	94.61	94.61
Auxiliary Consumption	MU		0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Net Generation	MU		93.66	93.66	93.66	93.66	93.66	93.66	93.66	93.66	93.66
Fixed Cost	Unit	Year>	81	19	20	21	22	23	24	25	26
O&M Expenses	Rs Lakh		1916.86	2026.50	2142.42	2264.96	2394.52	2531.48	2676.28	2829.37	2991.21
Depreciation	Rs La		336.88	336.88	336.88	336.88	336.88	336.88	336.88	336.88	336.88
Interest on term loan	Rs Lakh		1	1	1	ı	1	1	1	1	1
Interest on working Capital	Rs La		130.83	135.90	141.26	146.93	152.92	159.25	165.94	173.02	180.50
Return on Equity	Rs Lakh	//	1854.18	1854.18	1854.18	1854.18	1854.18	1854.18	1854.18	1854.18	1854.18
Total Fixed Cost	Rs Lakh		4238.74	4353.45	4474.73	4602.94	4738.49	4881.78	5033.28	5193.44	5362.76
Per Unit Cost of Generation	Unit	Year>	81	61	20	21	22	23	24	25	26
O&M expn	Rs/kWh		2.05	2.16	2.29	2.42	2.56	2.70	2.86	3.02	3.19
Depreciation	Rs/kWh		0.36	0.36	0.36	0.36	0.36	0.36	0.36	0.36	0.36
Int. on term loan	Rs/kWh		00.00	0.00	00.0	0.00	00.00	0.00	0.00	0.00	00.00
Int. on working capital	Rs/kWh		0.14	0.15	0.15	0.16	0.16	0.17	0.18	0.18	0.19
RoE	Rs/kWh		1.98	1.98	1.98	1.98	1.98	1.98	1.98	1.98	1.98
Total COG	Rs/kWh		4.53	4.65	4.78	4.91	5.06	5.21	5.37	5.54	5.73
Discount Rate	%	9.42%									
Discount Factor	41		0.186	0.169	0.153	0.138	0.125	0.114	0.103	0.093	0.084
Discounted Tariff			0.85	0.79	0.74	69.0	0.64	09.0	95.0	0.52	0.49
Levellised Tariff for 35 years	Rs/kWh 6.34	6.34									



Units Generation	Unit	Year>	27	28	29	30	31	32	33	34	35
Installed Capacity	MW		24	24	24	24	24	24	24	24	24
Gross Generation	MU		94.61	94.61	94.61	94.61	94.61	94.61	94.61	94.61	94.61
Auxiliary Consumption	MU		0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Net Generation	MU		93.66	93.66	93.66	93.66	93.66	93.66	93.66	93.66	93.66
Fixed Cost	Unit	Year>	72	28	29	30	31	32	33	34	35
O&M Expenses	Rs Lakh		3162.30	3343.19	3534.42	3736.59	3950.32	4176.28	4415.16	4667.71	4934.70
Depreciation	Rs La		336.88	336.88	336.88	336.88	336.88	336.88	336.88	336.88	336.88
Interest on term loan	Rs Lakh			1	'	'	•	ī		'n	ı
Interest on working Capital	Rs La		188.41	196.78	205.62	214.97	224.85	235.29	246.34	258.01	270.36
Return on Equity	Rs Lakh		1854.18	1854.18	1854.18	1854.18	1854.18	1854.18	1854.18	1854.18	1854.18
Total Fixed Cost	Rs Lakh		5541.77	5731.02	5931.09	6142.61	6366.22	6602.62	6852.55	7116.78	7396.11
Per Unit Cost of Generation	Unit	Year>	27	28	29	30	31	32	33	34	35
O&M expn	Rs/kWh		3.38	3.57	3.77	3.99	4.22	4.46	4.71	4.98	5.27
Depreciation	Rs/kWh		0.36	0.36	0.36	0.36	0.36	0.36	0.36	0.36	0.36
Int. on term loan	Rs/kWh		00.0	0.00	0.00	00.0	00.0	00.00	00.0	0.00	0.00
Int. on working capital	Rs/kWh		0.20	0.21	0.22	0.23	0.24	0.25	0.26	0.28	0.29
RoE	Rs/kWh		1.98	1.98	1.98	1.98	1.98	1.98	1.98	1.98	1.98
Total COG	Rs/kWh		5.92	6.12	6.33	6.56	08.9	7.05	7.32	09.7	7.90
Discount Rate	%	9.42%									
Discount Factor			9/0.0	690.0	0.063	0.057	0.051	0.047	0.042	0.038	0.035
Discounted Tariff			0.46	0.43	0.40	0.38	0.35	0.33	0.31	0.29	0.28
Levellised Tariff for 35 years	Rs/kWh 6.34	6.34									

Annexure - B:REVIEW OF PROJECT COST (CIVIL WORKS)

			The second secon						
SI. No.	Components of the Project	Unit	Rates negotiated with Contractor PostawardinRs.	Contract rateas per agreement Rs	Rates recommended for acceptanceBy APSERC (including price variation (2.7%) for labour&fuel, etc.) Rs.	Quantity as per actual construction of HEP by Petitioner Rs.	Quantities recommended for acceptance by APSERC Rs.	Cost recommended for acceptance by APSERC Rs.	Cost as per Petitioner Rs.
-	Up stream Works								
Ą.	River Diversion Works								
1	Excavation*	m ₃	400	300	308.1		18000	5,545,800.00	7,200,000.00
2	Earth Filling*	m ₃	200	500	200	0	22000	11,000,000.00	11,000,000,00
2	Gabion wall with wire crate		2500	1800	1848.6	3500	3500	6,470,100.00	8,750,000.00
B	Diversion Structure							-	
_	Excavation	m ₃	200	300	308.1		18800	5,792,280.00	9,400,000,00
2	Earth Filling		400	500	400	12000	12000	4,800,000.00	4,800,000.00
2	Reinforcement steel **		48000	80000	48000	72	72	3,456,000.00	3,456,000.00
7	Reinforced cement concrete**	m3	10200	6100	6264.7	1926	1926	12,065,812.20	19,645,200.00
S	Regulating Gates-Supply	Nos.	TS			3	3		00.000,000,00
9	Regulating Gates-Erection		TS			3	3	4,000,000,000	4,000,000,00
7	Steel Trash Racks	No.	rs			1	1	3,800,000,000	3,800,000,00
၁	Desilting Arrangement & Conveyance channel								
-	Excavation	m ₃	550		308.1	5	15896	4,897,557.60	8,742,800.00
2	Reinforced cement concrete	m ₃	10200	7500	7702.5	3897	3897	30,016,642.50	39,749,400.00
3	Reinforcement steel	MT	48000	80000	48000	321	321	15,408,000.00	15,408,000.00
7	PCC M10	m3	2000		5135	2024	2024	10,392,572.45	14,167,090.00
'n	Spillway Gate Supply	No.	LS			1	1	00.000,009	00.000,009
9	Spillway Gate Erection	No.	TS			1		400,000,00	400,000.00
7	Flushing pipe 450 dia with 500 mtrs length Supply	MT	80000		80000		62	4,960,000.00	4,960,000.00
∞	Flushing pipe 450 dia with 500 mtrs length Erection	MT	30000		30000	62	62	1,860,000.00	1,860,000.00
9	Flushing pipe 600 dia with 500 mtrs length *Supply	MT	90059		92000		16	5,915,000.00	5,915,000.00
10	Flushing pipe 600 dia with 500 mtrs length Erection	MT	25000		25000	16	16	2,275,000.00	2,275,000.00
11	Steel Pipeline 3.5 m dia with 200 mtrs length to be laid in the	MT	90009		92000	209	209	13,585,000.00	13,585,000.00
12	Steel Pipeline 3.5 m dia with 200 mtrs length to be laid in the	MT	25000		25000	209	209	5,225,000.00	5,225,000.00
13	Water Stop Type A	ш	400		400	10000	10000	4,000,000.00	4,000,000.00
+1	Water Stop Type B	ш	300		300	6500	6500	1,950,000.00	1,950,000.00
15	Dewatering	Kwh	12		12	1000000	1000000	12,000,000.00	12,000,000.00
Q	Tunnel Intake								
1	Excavation	m ₃	550	1100	550	1447	1447	795,850.00	795,850.00
				AND DESCRIPTION OF THE PERSON					

Secretary
State Electricity Regulatory Commission
Arunachal Pradesh

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A. HETCHEAD RACE TUNNEL MT 48000 80000 48000 22 22 1,078,080.00 1,078,080.		Reinforced cement concrete	m ₃	10200	7500	7702.5	291	291	2,241,427.50	2,968,200.00
HEAD RACE TUNNEL HEAD RACE TUNNEL - - HKT (Head Race Tunnel) including Adits m³ 550 1100 550 1500 1500 2.55,000.00 Open Excavation m³ 2900 1100 550 1600 8257,000.00 8250,000.00 Underground excavation m³ 3600 2200 2290 104131 9557 27,115,300.00 Underground excavation (fissured) m³ 8000 5700 2894 16150 16150 36,489,310.00 Underground excavation (fissured) m³ 8000 5700 583.9 50207 17305 101,301,395.00 Back fill and cavity m³ 8000 5700 583.9 50207 14880 145,645,032.00 Reinforcement steel MT 8000 6000 61620 31 31 20,396,220.00 Rock bolts 25nm dia from fore poling & Anchoring for Ribs RMT 1400 950 975.65 9374 9,145,743.10 Rock bolts 25nm dia for bolts 25nm dia <td< td=""><td></td><td>Reinforcement steel</td><td>MT</td><td>48000</td><td>80000</td><td>48000</td><td>22</td><td>22</td><td>1,078,080.00</td><td>1,078,080.00</td></td<>		Reinforcement steel	MT	48000	80000	48000	22	22	1,078,080.00	1,078,080.00
HRT (Head Race Tunnel) including Adits m³ 550 1100 550 15000 15000 15000 2750,000.00 Open Excavation m³ 550 1100 550 15000 15000 8.250,000.00 Underground excavation m³ 2900 2200 2259.4 16150 16710 36,489,310.00 Underground excavation (fissured) m³ 8000 2200 2259.4 16150 16150 36,489,310.00 Concrete-lining m³ 8000 5700 8853.9 16150 16150 36,489,310.00 Reinforcement steel m³ 8000 80000 61620 331 331 331 331 331 335,6220.00 Reinforcement steel MT 80000 80000 80000 80000 1110 1110 88,80,000.00 Rock bolts 25mm dia Rock bolts 25mm dia RMT 1400 950 975.65 9374 9145,743.10 974 9,145,743.10 Grouting Works for Adit-1 & Adit-2 Areas m³ <	7	HEAD RACE TUNNEL								
avaition m3 550 1100 550 15000 15000 8,250,000.00 and excavation m3 2900 3100 2900 104131 95557 277,115,300.00 and excavation m3 3650 2200 2259.4 16150 16150 36,489,310.00 siming m3 8000 5700 5853.9 50207 17305 101,301,739,50 and cavity m6 cavity MT 65000 60000 61620 331 24880 145,645,032.00 stel Ribs MT 80000 80000 80000 80000 1110 1110 18,8800,000.00 s, 25mm dia Anchoring for Ribs RMT 1400 950 97.65 97.65 9374 9,145,743.10 Works for Adit-1 & Adit-2 Areas m³ 1200 12000 12000 12000 12000 6,504,000.00	Α.	HRT (Head Race Tunnel) including Adits							,	
und excavation m3 2900 3100 2900 104131 95557 277,115,300.00 and excavation (fissured) m3 3650 2200 2259.4 16150 16150 36,489,310.00 lining m3 8000 5700 5853.9 50207 17305 101,301,739,50 nd cavity ment steel MT 65000 60000 61620 331 24880 145,645,032.00 steel Ribs MT 80000 80000 80000 80000 1110 1110 88,800,000.00 s, 25mm dia Anchoring for Ribs RMT 1400 950 97.65 97.65 9374 9,145,743.10 Works for Adit-1 & Adit-2 Areas m³ 1200 12000 12000 90,000,000.00 90,000,000.00 90,000,000.00		Open Excavation	m³	550	1100	550	15000	15000	8,250,000.00	8,250,000.00
und excavation (fissured) m³ 3650 2200 2259.4 16150 16150 36,489,310.00 lining m³ 8000 5700 5853.9 50207 17305 101,301,739,50 nd cavity ment steel T 60 5700 5853.9 24880 145,645,032.00 steel Ribs MT 8000 6000 61620 331 31 20,396,220.00 steel Ribs MT 8000 8000 8000 1110 1110 88,800,000.00 s, 20mm dia Anchoring for Ribs RMT 1400 950 97.65 97.65 9374 9,145,743.10 Works for Adit-1 & Adit-2 Areas m³ 1200 12000 12000 90,000,000.00 90,000,000.00		Underground excavation	m ₃	2900	3100	2900	104131	95557	277,115,300.00	301,979,900.00
lining m³ 8000 5700 5833.9 50207 17305 101,301,739.50 2 and cavity nd cavity MT 65000 60000 61620 331 24880 145,645,032.00 steel Ribs MT 80000 80000 80000 80000 1110 1110 88,800,000.00 s, 25mm dia Anchoring for Ribs RMT 1500 950 97.65 1368 1368 13,335,184.20 Works for Adit-1 & Adit-2 Areas m³ 1200 97.0 97.65 97.65 9374 9145,743.10 90,000,000.00 m³ 1200 1200 12000 12000 90,000,000.00 90,000,000.00 90,000,000.00		Underground excavation (fissured)	m ₃	3650	2200	2259.4	16150	16150	36,489,310.00	58,947,500.00
nnd cavity nnd cavity formout of the cavity formout steel formou		Concrete-lining	m ₃	8000	2700	5853.9	50207	17305	101,301,739.50	401,656,000.00
ment steel MT 65000 61020 331 331 20,396,220,00 2 steel Ribs MT 80000 80000 80000 1110 1110 88,800,000,00 8 s 25mm dia Achter Ribs RMT 1500 950 97.65 13668 13668 13,335,184.20 2 s 20mm dia for fore poling & Anchoring for Ribs RMT 1400 950 97.65 97.45 97.4 97.45,743.10 1 Works for Adit-1 & Adit-2 Areas m³ 1200 8000 1200 5420 5420 6,504,000.00 6		Back fill and cavity		0	5700	5853.9		24880	145,645,032.00	
stel Ribs MT 80000 80000 80000 1110 1110 88,800,000,000 8 s 25mm dia s 25mm dia 13668 13668 13,335,184.20 2 2 2 2 2 2 2 3 3 3 3 184.20 2 3 3 3 1 3 1 4<		Reinforcement steel	MT	00059	00009	61620	331	331	20,396,220.00	21,515,000.00
5. 25mm dia RMT 1500 950 975.65 13668 13668 13,335,184.20 2 5. 20mm dia for fore poling & Anchoring for Ribs RMT 1400 950 976.65 9774 9374 9,145,743.10 1 Works for Adit-1 & Adit-2 Areas Per bags 750 1400 750 120000 120000 90,000,000.00 9 Morks for Adit-1 & Adit-1 & Adit-2 Areas m³ 1200 8000 1200 5420 5420 6,504,000.00 6		Structural steel Ribs	MT	80000	80000	80000	1110	1110	88,800,000.00	88,800,000.00
5 20mm dia for fore poling & Anchoring for Ribs RMT 1400 950 975.65 9374 9374 9,145,743.10 1		Rock bolts 25mm dia	RMT	1500	950	975.65	13668	13668	13,335,184.20	20,502,000.00
Works for Adit-1 & Adit-2 Areas Per bags 750 1400 750 120000 90,000,000.00 6,000,000.00 6,504,000.		Rock bolts 20mm dia for fore poling & Anchoring for Ribs	RMT	1400	950	975.65	9374	9374	9,145,743.10	13,123,600.00
m³ 1200 8000 1200 5420 6,504,000.00		Grouting Works for Adit-1 & Adit-2 Areas	Per bags	750	1400	750	120000	120000	90,000,000,00	90,000,000.00
	0	Shotcrete	m ₃	1200	8000	1200	5420	5420	6,504,000.00	6,504,000.00

SI. No.	Components of the Project	Unit	Rates negotiated with Contractor PostawardinRs.	Contract rateas per agreement Rs	Rates recommended for acceptanceBy APSERC (including price variation (2.7%) for labour & fuel, etc.) Rs.	Quantity as per actual construction of HEP by Petitioner Rs.	Quantities recommended for acceptance by APSERC Rs.	Cost recommended for acceptance by APSERC Rs.	Cost as per Petitioner Rs.
B	Cut & Cover Channel between Adit - 1 & Adit - 2								
1	Excavation	m ₃	550	550	550		237405	130,572,750.00	130,572,750.00
2	Reinforced cement concrete	m ₃	10500	6100	6264.7	13366	13366	83,733,980.20	140,343,000.00
3	Reinforcement steel	MT	48000	80000	48000	1491	1491	71,568,000.00	71,568,000.00
+	MS Pipe 16mm Supply	MT	59944		59944	26	26	5,814,568.00	5,814,568.00
5	Ms Pipe 16 mm Erection	MT	16000		16000	97	97	1,552,000.00	1,552,000.00
၁	Forebay / Surge Shaft								
I	Excavation	m ₃	550	550	550		11300	6,215,000.00	6,215,000.00
2	Excavation for widening of forbay in fissued rock	m ₃	3650	2200	2259.4	7170	7170	16,199,898.00	26,170,500.00
3	Concrete	m ₃	8400	2700	5853.9	2569	2569		21,579,600.00
+	Rock bolts 25mm dia	RMT 1000	1000	1000		4225	4225		4,225,000.00
5	Reinforcement steel	MT	00059	00008	00059	48	48	3,120,000.00	3,120,000.00
9	Structural steel Ribs	MT	00008	00008	00008	151	151	12,080,000.00	12,080,000.00
7	Regulation Gate Supply	FS	1200000		1200000			1,200,000.00	1,200,000.00
8	Regulation Gate Erection	ST	000008		000008		1	800,000,000	800,000,00
7	Escape Pipeline & Spilling Arrangement	TS						13,635,624.00	13,635,624.00

	I OHICI HOUSE & THINCH HOUSE			The second secon					
A.	Penstock, Powerhouse & Switchyard			and the said					
	Excavation	m ₃	400	300	308.1	147962	147962	45,587,092.20	59,184,800.00
	Concrete	m ₃	8000	5200	5340.4	12144	12144	64,853,817.60	97,152,000.00
	Reinforcement steel	MT	00059	00009	61620	347	347	21,382,140.00	22,555,000.00
	Structural steel Ribs	MT	80000	00006	80000	149	149	11,936,000.00	11,936,000.00
	Structural steel	MT	80000	00006	80000	150	150	12,000,000.00	12,000,000.00
	Welded Wire mesh	m ²	006	200	205.4	7150	7150	1,468,610.00	6,435,000.00
	Rock Dowel 25mm dia	ш	1100	1100	1100	3500	3500	3,850,000.00	3,850,000.00
	Penstock Steel-Supply	MT	90059	00009	61620	1460	1460	89,965,200.00	94,900,000.00
	Penstock Steel-Erection	MT	25000		25000	1460	1460	36,500,000.00	36,500,000.00
	Draft Tube Gates Supply	Nos	000006		000006	3	3	2,700,000.00	2,700,000.00
	Draft Tube Gates Erection	Nos	000009		000009	3	3	1,800,000.00	1,800,000.00
	PCC wall in power area	Cum	2800		2800	135	135	378,000.00	378,000.00
	Shotcrete	m ₃	1200	8000	1200	1250	1250	1,500,000.00	1,500,000.00
	Dewatering (New item added now)	Kwh	20		20	150000	150000	3,000,000.00	3,000,000.00
B.	Flood Protection Wall								
	Excavation	m ₃	350	300	308.1	1442	1442	444,280.20	504,700.00
	Concrete	m ₃	1500		1500	1385	1385	2,077,500.00	2,077,500.00
	Reinforcement steel	MT	48000	800000	48000	105	105	5,040,000.00	5,040,000.00
ن:	Tailrace								
	Excavation							,	
	Concrete								
	Reinforcement steel								
Ċ.	Tailrace								
	Tailrace Channel 50.35 m								
	Eveavation	m3	550	02.81	550	8596	8590	1 461 900 00	1 461 900 00

SI. No.	Components of the Project	Unit	Rates negotiated with Contractor PostawardinRs.	Contract rate as per agreement Rs	Rates recommended for acceptanceBy APSERC actual (including price variation (2.7%) for labour & fuel, etc.) Rs.	Quantity as per actual construction of HEP by Petitioner Rs.	Quantities recommended for acceptance by APSERC Rs.	Quantities ecommended Cost recommended for or acceptance acceptance by APSERC ay APSERC Rs.	Cost as per Petitioner Rs.
2	Concrete	m ₃	0008	5700	5853.9	631	531	3,693,810.90	5,048,000.00
3	Reinforcement steel	MT 480	00	80000	48000	105	05	5,040,000.00	5,040,000.00
							Section of the sectio		

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	Tailrace Tunnel								
,	Excavation	m ₃	1150	1870	1150	7685	7685	8,837,750.00	8,837,750.00
2	Concrete	m ₃	8000	5700	5853.9	1350	1350	7,902,765.00	10,800,000.00
3	Reinforcement steel	MT	00059	00059	00059	13.5	13.5	877,500.00	877,500.00
+	Structural steel Ribs	MT	80000	80000	80000	42	42	3,360,000.00	3,360,000.00
5	Rock bolts 25mm dia for fore poling	RMT	1500	1100	1129.7	1140	1140	1,287,858.00	1,710,000.00
9	Shotcrete	m ₃	1200	8000	1200	212	212	254,400.00	254,400.00
7	Regulating Gates Supply	No.	TS			1		1,500,000.00	1,500,000.00
8	Regulating Gates Erection	No.	ST					1,000,000.00	1,000,000.00
6	Dewatering (New item added now)	Kwh	20		20	74000	74000	1,480,000.00	1,480,000.00
D.	Landslideat Powerhouse & Switchyard areas and protection								
	Powerhouse & Switchyard area								
1	Hard Rock	m ₃	550		550	40835	40835	22,459,250.00	22,459,250.00
2	Soft Rock	m ₃	300		300	35265	35265	10,579,500.00	10,579,500.00
	Hill Side protection works								
I	Concrete	m ₃	8000	5700	5853.9	1911	1611	6,971,994.90	9,528,000.00
2	Reinforcement steel	MT	00059	80000	90009	72	72	4,680,000.00	4,680,000.00
E.	Increase in the cost of TMT steel, Cement, Sand & Aggregate								
1	Diversion structure,							1,145,435.00	1,145,435.00
2	De-silting arrangement,							2,038,913.00	2,038,913.00
3	Tunnel intake							348,402.00	348,402.00
<i>†</i>	HRT incl Adits,							35,733,997.00	35,733,997.00
5	Cut & Cover channel,							16,167,870.00	16,167,870.00
9	Fore bay							1,225,805.00	1,225,805.00
2	Powerhouse,							10,488,067.00	10,488,067.00
8	Flood protection wall,							187,013.00	187,013.00
6	Tail race							2,783,136.00	2,783,136.00
	Protection & Drainage works								
1	RR Masonry wall	m³	4500		4500	2867	2867	12,901,500.00	12,901,500.00
2	Gabion wall with wire crate	m ₃	2500		2500	6255	6255	15,638,500.00	15,638,500.00
	Actual expenditure on Fuels & Lubricants								81,347,000.00
	ADD: Difference amount in restoration of flood damage works (1,2 and	pur							65,163,000.00
	3) and insurance ciaim settled (1 ∞ 2)								
	Total Cost							1,827,796,147.15	2,359,182,600
	Total cost in Rs Crores							182.78	235.91

Annexure - C: REVIEW OF PROJECT COST (E&M WORKS)

S.No	E&M Expense Heads	Cost Recommended by
		APSERC(Rs. Cr)
1	E&M cost	21.9377
2	Taxes & Duties	3.94
3	Erection,testing and commissioning, site supervision and insurance	5.99
4	Total E&M cost	31.8677

Annexure - D: COMMISSIONS ANALYSIS - TARIFF CALCULATION

		DIKSHI	HEP		
		Small H	ydro: Assumptions Parameter	s	
S. No.	Assumption Head	Sub-Head	Sub-Head (2)	Unit	CALL VILLE BELLEVILLE
No.			Installed Power Generation Capacity	MW	24
1	Power	Capacity	Capacity Utilization Factor	%	45%
	Generation	Supusity	Auxiliary Consumption	%	1%
			Useful Life	Years	35
2	Project Cost	Capital Cost/MW	Power Plant Cost	Rs Lacs/MW	27483.00
3	Period		Tariff Period	Years	35
			Subsidy		500
			Debt	%	70%
		Debt: Equity	Equity	%	30%
			Total Debt Amount	Rs Lacs	18738.100
			Total Equity Amout	Rs Lacs	8244.900
			Loan Amount	Rs Lacs	18738.10
4	Sources of		Moratorium Period	years	0
-	Fund	Debt Component	Repayment Period(incld Moratorium)	years	13
			Intrest Rate	%	10.43%
			Equity amount	Rs Lacs	8244.90
		Equity Component	Return on Equity for first Project Life	% p.a	17.60%
			Discount Rate		9.38%
			Income Tax	%	29.120%
		Depreciation			
5	Financial		Allowed Depriciation	%	90%
3	Assumptions		Depreciation Rate for first 13 years	%	5.28%
			Depreciation Rate 14th year onwards	%	As per RE Regulation 2018
		O&M Charges		Months	1
		Maintenance Spare	(% of O&M exepenses)		15%
6	Working Capital	Receivables for Debtors		Months	2
		Intrest On Working Capital		%	11.43%
7	Operation &	O&M Expenses		Rs Lacs	30.17
'	Maintenance	(2019-20) Total O & M	Expenses Escalation	%	5.72%
	Generation on	id Sale Of Energy	Expenses Escalation	70	0.1270
8	Generation an			Hrs	8766
		Total No. of Hours			

Interest rate:

Month	1 year Tenor-wise MCLR Rates (Source:
	SBI Monthly Press Releases)
Mar-19	8.55%
Apr-19	8.50%
May-19	8.45%
Jun-19	8.45%
Jul-19	8.40%
Aug-19	8.25%
Avg. for last Available 6 months	8.43%
Interest on loan Interest Rate of two hundred (200) basis points above the average State Bank of India MCLR (One year Tenor) prevalent during the last available six months of the relevant year of the Control Period for the determination of tariff.	10.43%
Interest on Working Capital shall be computed at rate equivalent to the normative interest rate of three hundred (300) basis points above the average State Bank of India MCLR (One Year Tenor) prevalent during the last available six months for the determination of tariff".	11.43%

Mat rate:

1st April 2018 mat rate	18.50%	
category		
< 1cr	19.24	4% cess
1-10 cr	20.59	4% cess + 7% surcharge
>10 cr	21.55	4% cess + 12% surcharge
Avg	20.46	

Calculation Sheet for Dikshi HEP:

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_	2023	2024 2025	25 2026	2027	2028	2029 20	8	2031 2032	2033	2034	2035	2036	2037	2038 2	2039 2	2040 2	2041 2	2042 20	2043 2044	4 2045	2046	2047	2048	2049	2050	2021	202	2053	Aug-54
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State Electricity Regulatory Commission Arunachal Pradesh

Annexure – E: ATTENDANCE FOR THE HEARING ON DATED 11/12/2019 AT APSERC, COURT ROOM

Attendance for the hearing on dated 11/12/2019 at APSERC, Court Room

Slino	Name	Department/Designation	Email id	Mobile no.	Signature
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22.	Shubham Pant	< B1P	shbhmbat@	8755 (63807	81-
23.	Marki Loya	Director	gmail.com	-	1 -
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