

**BEFORE**  
**THE BIHAR ELECTRICITY REGULATORY COMMISSION**  
**VIDYUT BHAWAN - II, PATNA**

**Petition for seeking relaxation in Directions/Regulations of the Hon'ble  
Commission**

**and Compliance to Tariff Order dated 20 March 2020**

**owing to the outbreak of COVID-19 Pandemic**

**by**

**Bihar State Power Transmission Company Limited**

**(BSPTCL)**

**Patna**



**Chief Engineer (Planning & Engineering) / Director (Operations)**

**1<sup>st</sup> Floor, Vidyut Bhawan - I,**

**Jawaharlal Nehru Marg,**

**Patna - 800 021**

**21<sup>th</sup> May 2020**

**BEFORE**  
**THE BIHAR ELECTRICITY REGULATORY COMMISSION**  
**VIDYUT BHAWAN - II, PATNA**

Filing No.:

Case No.:

IN THE MATTER OF

**Filing of Petition before the Hon'ble Commission seeking relaxation in Directions/Regulations of the Hon'ble Commission and Compliance to Tariff Order dated 20 March 2020, owing to outbreak of COVID-19 pandemic, a Force Majeure event, preventing the Petitioner from complying with such directions/Regulations, under BERC (Conduct of Business) Regulations, 2005**

AND

IN THE MATTER OF  
THE APPLICANT

**Bihar State Power Transmission Company Limited (herein after referred to as 'BSPTCL' or 'Petitioner'), which shall mean for the purpose of this Petition the Licensee, having its registered office at Vidyut Bhawan -I, Jawaharlal Nehru Marg, Patna - 800 021..... The Petitioner**

**AFFIDAVIT**

I,.....Uttam Kumar..... aged around.....61..... years, son of Late P Yadav. ....presently employed as Director (Operations), BSPTCL, having my registered office at Vidyut Bhawan -I, Jawaharlal Nehru Marg, Patna - 800 021, do solemnly affirm and say as follows:

1. I am the Authorized Signatory of Bihar State Power Transmission Company Limited (BSPTCL), the Petitioner in the above matter, and am duly authorized and competent to make this affidavit.

2. I say that the information made in this Petition are based on the records of the Company and on the information received from the concerned officers of the Company and I believe them to be true.
3. I say that there are no proceedings pending in any court of law/tribunal or arbitrator or any other authority, wherein the Petitioners are a party and where issues arising and /or reliefs sought are identical or similar to the issues arising in the matter pending before the Hon'ble Commission.

I solemnly affirm at Patna on this 21<sup>th</sup> day of May 2020, that the contents of the above affidavit are true to my knowledge, no part of it is false and nothing material has been concealed there from.

**Identified before me**  
**Patna**  
**May 21, 2020**

**Sd/-**  
**Director (Operations)**  
**Bihar State Power Transmission Company Limited**

Filing No.:

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IN THE MATTER OF

**Filing of Petition before the Hon'ble Commission seeking relaxation in Directions/Regulations of the Hon'ble Commission and Compliance to Tariff Order dated 20 March 2020, owing to outbreak of COVID-19 pandemic, a Force Majeure event, preventing the Petitioner from complying with such directions/Regulations, under BERC (Conduct of Business) Regulations, 2005**

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IN THE MATTER OF  
THE APPLICANT

**Bihar State Power Transmission Company Limited (herein after referred to as 'BSPTCL' or 'Petitioner'), which shall mean for the purpose of this Petition the Licensee, having its registered office at Vidyut Bhawan -I, Jawaharlal Nehru Marg, Patna - 800 021**

The Petitioner respectfully submits as under:

Bihar State Power Transmission Company Limited (BSPTCL) is a Company registered under the Companies Act, 1956 in June 2012, to which the State Government through the Department of Energy has vested the transmission undertakings of the erstwhile Bihar State Electricity Board (BSEB) in Bihar and is a fully owned subsidiary company of Bihar State Power (Holding) Company Limited (BSPHCL).

BSPTCL owns and operates the transmission system above 33kV, i.e., at 132kV and 220kV system and is presently carrying out the function of intra-State transmission and wheeling of electricity in the State of Bihar.

BSPTCL in this present Petition requests the Hon'ble Commission to grant relaxation in directions / conditions/ Regulations as prayed in this Petition in view of the unprecedented situation that has arisen due to outbreak of COVID-19 corona virus pandemic, which is a Force Majeure condition, and beyond the control of BSPTCL.

The Central Government on 24 March 2020 issued an advisory for imposition of a complete lockdown in the country for the next 21 days, in order to contain the spread of COVID- 19 pandemic. Initially the lockdown was declared up to 14 April 2020, which has presently been extended till 31 May 2020, and may even be extended further. Even if the complete lockdown is relaxed after 17 May 2020, operations and functioning of the offices shall continue to be at sub-optimal levels, and will take significant time before operations are normalised.

Owing to the lockdown and the advisory issued by the Government to maintain social distancing, BSPTCL respectfully submits that at this stage, it is not in a position to comply with such conditions / directives/Regulations of the Hon'ble Commission that are applicable to BSPTCL as a Transmission Licensee. BSPTCL is currently functioning with very limited number of manpower and therefore is not at its full efficiency. BSPTCL respectfully submits that there is no clarity on the date of lifting the lockdown or the estimated time for the situation to get normalised.

## **1 Relaxation in Directions/Regulations applicable to BSPTCL**

BSPTCL would like to submit that it has to comply with the conditions specified in BERC (Standards of Performance of Intra-State Transmission Licensees) Regulations, 2019 and any such conditions/directions/Regulations issued by the Hon'ble Commission from time to time, that are applicable to BSPTCL as a Transmission Licensee. The Petitioner respectfully requests the Hon'ble Commission to grant relaxation to BSPTCL from complying with the conditions specified in BERC (Standards of Performance of Intra-State Transmission Licensees) Regulations, 2019 under the Powers to Relax during Force Majeure conditions, as specified in Regulation 9 of BERC (Standards of Performance of Intra-State Transmission Licensees) Regulations, 2019. The relevant provisions are as follows:

*"9. Power to Relax. – The Commission may, if it considers necessary or expedient to do so and for the reasons to be recorded in writing, relax adherence to any specific Standard of Performance during Force Majeure conditions such as war, mutiny, civil commotion, riot, flood, cyclone, Storm, lightning, earthquake, grid failure, and strike/curfew, lockout, fire affecting the intra-State Transmission Licensee's installations and operation activities, or under such other specific circumstances:*

*Provided that the Intra-State Transmission Licensee shall not be discharged from its liability on account of its failure to maintain the Standards of Performance under these regulations if such failure can be attributed to the negligence or deficiency or lack of preventive maintenance of the intra-state transmission system or failure to take reasonable precaution which has resulted in loss to the affected person."*

The Petitioner also respectfully requests the Hon'ble Commission to grant relaxation to BSPTCL from complying with the conditions specified in Bihar Electricity Grid Code, 2010 ('Grid Code') as specified in the exemption clause in Regulation 1.12 on account of Force Majeure conditions such as the present, being a Reportable event covered under Regulation 10.3 of the Grid Code.

BSPTCL submits that the actual impact of outbreak of said pandemic over performance of BSPTCL cannot be foreseen / assessed at present, however, based on operational difficulties actually being faced by BSPTCL, some relief is being sought in this Petition, which may be supplemented in due course of time, if needed, to overcome the challenges posed by the pandemic.

The outbreak of COVID-19 (Corona virus) pandemic and the steps taken by the Government to contain it, particularly imposition of complete Lockdown, have immensely affected and are still continuing to affect the functioning of BSPTCL. BSPTCL in these arduous conditions, realising the necessity of electricity, which plays a vital role in success of other essential amenities related to health services, water supply, civic amenities, etc., being provided by the Government to contain the spread of this Pandemic, has been maintaining almost uninterrupted power supply in the State. However, BSPTCL is prevented from complying with the Directions / Regulations of the Hon'ble Commission due to outbreak of COVID-19 pandemic, a Force Majeure event. It is imperative to mention that to maintain social distancing and to comply with the guidelines issued by the Government to contain the spread of Corona virus, BSPTCL has taken several measures such as functioning with limited capacity, allowing very limited number of manpower to work in field and other offices, stoppage of works related to construction of lines/substation, etc. Apparently, all these measures have a very adverse effect on BSPTCL operations, particularly on the overall effective and efficient functioning of BSPTCL. BSPTCL, for the aforementioned reasons attributable to the said Pandemic, is unable to fully comply with the conditions specified in the BEREC (Standards of Performance of Intra-State Transmission Licensees) Regulations, 2019 and conditions specified in Bihar Electricity Grid Code, 2010 amended from time to time and any other Regulations/conditions/directions specified by the Hon'ble Commission from time to time, which are applicable to BSPTCL as a Transmission Licensee. BSPTCL, hence, requests the Hon'ble Commission to kindly exempt BSPTCL from fully complying with all such directions/conditions/Regulations applicable to BSPTCL that are issued by the Hon'ble Commission from time to time, at least by 90 days from the

date of filing of this Petition or till such time the situation normalizes, whichever is later.

## **2 Condonation of Delays in execution of Ongoing Works**

BSPTCL would like to submit that due to the Force Majeure conditions prevalent due to the pandemic and on account of the lockdown declared by the Government, the construction works of transmission line and sub-station have come to a complete halt. All the ongoing works are temporarily/completely suspended till the time lockdown is lifted and the situation normalizes. Only Operation and Maintenance (O&M) works and emergency restoration works are taken up by BSPTCL so as to maintain 24x7 uninterrupted power supply to all GSS/consumers, so that all the essential services can run smoothly.

BSPTCL would hence like to submit that the project related works for upcoming GSS and associated lines are expected to get delayed from the estimated timelines for completion. BSPTCL submits that the impact of delay in execution of projects due to such Force Majeure conditions may also be seen on Interest During Construction (IDC) and related factors.

BSPTCL hence request the Hon'ble Commission to kindly condone such delays that will incur in execution of project related works and its consequential impact on IDC and other related factors, till such time when situation normalises.

## **3 Relaxation in Compliance of Directives issued vide Tariff Order**

The Hon'ble Commission vide Tariff Order dated 20 March 2020 had directed BSPTCL to comply with the directions specified in Compliance to Directions chapter of the Tariff Order. BSPTCL had to comply to the directions issued by the Hon'ble Commission as per the time frame stipulated in the Tariff Order. As stated above, due to lack of manpower in the head office and at the field level, BSPTCL is not in a position to comply with the such directions within the time frame specified in the Tariff Order. In view of the current situation and the lockdown forced by the Government, BSPTCL requests the Hon'ble Commission to grant relaxation in the time line stipulated in the Tariff Order for complying to such directives. BSPTCL requests the Hon'ble Commission to exempt from compliance of all such directives at least by 90 days from the last date of compliance as specified for the respective

directives, as stated in the Tariff Order or till the time situation normalizes, whichever is later. The directives alongwith time frame is mentions as below:

**• Directives under Tariff Order published by the Hon'ble  
Commission dated 20<sup>th</sup> March 2020**

Sl. No.	Particular	Action Point	Compliance Date	Time line requested by BSPTCL
1.	<b>Directive 1:</b> Energy Auditing and Transmission Loss	<p>In response to this directive, the BSPTCL has stated that it has taken up the project for supply, installation, testing &amp; commissioning of DLMS compliant 0.2 class ABT type energy meter with implementation of 100% metering, data acquisition and online ABT monitoring &amp; AMC for a period of 5 years. The project cost is Rs.73.06 Crore and has been executed by M/s Secure Meters Ltd. and status of the project is as below:</p> <p><input type="checkbox"/> Total number of GSS as per order: 96 nos</p> <p><input type="checkbox"/> Total no. of meters to be installed as per order: 1600 Nos.</p> <p><input type="checkbox"/> Approval for additional 46 nos. of GSS has been accorded thereby making total number of GSS: 142 nos.</p> <p><input type="checkbox"/> Total number of meters assessed for 142 Nos. of GSS: 1769 Nos.</p> <p><input type="checkbox"/> All ABT meters and Metering Panels have been installed in all 142 Nos. GSS of BSPTCL.</p> <p><input type="checkbox"/> It has submitted the transmission loss and its calculations for the month of June, July and August 2019 with relevant supporting data of voltage-wise import and BSPTCL Tariff Order for FY 2020-21 Bihar Electricity Regulatory Commission   Page 165</p>	30.06.2020	30 <sup>th</sup> September 2020 or 90 days from the normalisation of the situation whichever is later



		<p>export of the system, along with the revised transmission loss calculations of April 2019, May 2019.</p> <p>□ BSPTCL has also submitted Energy loss for 68 Nos. of GSS with metered data for the Month of September 2019 is at 2.53%.</p> <p>The Commission notes the compliance and further directs the petitioner to submit a Consolidated report on the actual transmission loss for FY 2019-20 by 30.06.2020.</p>		
2.	<b>Directive-2:</b> Maintenance of Asset /Property Register	<p>Commission has directed BSPTCL to Maintain Asset/Property Register with all desired details.</p> <p>Commission will be compelled to take punitive action in the next tariff order.</p>	30.06.2020	30 <sup>th</sup> September 2020 or 90 days from the normalisation of the situation whichever is later.
3.	<b>Directive-3:</b> Details of programmed Capital Works	<p>BSPTCL has submitted the details of date of commissioning of projects, mode of finance, and cost of all the projects. Commission finds that there are time overrun in the projects for which the BSPTCL has explained that the time overrun of the project are due to technical constraints and various aspects such as problems in Right of Way, BSPTCL Tariff Order for FY 2020-21 Bihar Electricity Regulatory Commission   Page 166 Land Acquisition, etc., requiring the co-operation of other agencies. Commission in the</p>	30.06.2020	30 <sup>th</sup> September 2020 or 90 days from the normalisation of the situation whichever is later

		<p>past has been firmly of the view that time/cost overrun must be got approved by the Commission with full justification. The Commission has noted the reply and directs the petitioner to submit project-wise details with justification preferably before the filing of the annual tariff petition and in no case later than at time of filing tariff petition.</p>		
4.	<p><b>Directive-4:</b></p> <p>Synchronizing the Planned Transmission Work with BGCL</p>	<p>On the possible mismatch in synchronization of projects of BSPTCL and BGCL, the BSPTCL submitted that as per details emerged in meeting held with BGCL officials on November 14, 2019, it is confirmed that there is no work of BSPTCL which is held-up on account of delay on BGCL's side or vice-versa.</p> <p>The Commission has noted the assurance given by the BSPTCL and directs the petitioner to follow the same procedure every year and submit a certificate to this effect along with tariff petitions every year.</p>	30.06.2020	<p>30<sup>th</sup> September 2020 or 90 days from the normalisation of the situation whichever is later</p>
5.	<p><b>Directive-5:</b></p> <p>Meters at interface points of BSPTCL &amp; BGCL</p>	<p>A report of energy transmitted by BGCL transmission system into BSPTCL system at all interface point for the months of June, July and August 2019 has been submitted which is noted. It was decided in the meeting held on 14.11.2019 with BGCL officials that joint meter reading would be taken (from November 2019) at midnight of the last date of every month to ensure synchronization of data. It was also resolved that the DISCOMs should also need to be involved in this exercise so that the synchronization process is complete in all respects. The Commission directs the petitioner</p>	30.04.2020	<p>30<sup>th</sup> September 2020 or 90 days from the normalisation of the situation whichever is later</p>

		<p>to take joint meters reading at all the interface points of BGCL/DISCOMs. BSPTCL shall prepare joint protocol with DISCOMs/ BGCL for meter calibration/accuracy and meter reading so that the transmission loss in the system can be properly calculated and mismatch in transmission loss reporting is avoided.</p> <p>It is further directed that monthly reconciliation statements in this respect be submitted to the Commission by 10<sup>th</sup> of every subsequent month.</p>		
6	<p><b>Directive-6:</b></p> <p>Auxiliary Consumption and Electricity Charges in the Staff Colonies</p>	<p>In response to Commissions' earlier directive on the above subject, the BSPTCL has said that it has intimated SBPDCL and NBPDCCL for installation of separate meter for auxiliary consumption and colony consumption. It has given following details in this respect :-</p> <ul style="list-style-type: none"> <li>□ 72 GSS are having colonies out of 142 GSS of BSPTCL;</li> <li>□ 9 GSSs are having separate metering for auxiliary consumption and colony consumption;</li> <li>□ 4 GSS are availing supply from DISCOM;</li> <li>□ For rest of the GSS, field officers of BSPTCL and DISCOM are coordinating for early installation of separate metering for auxiliary consumption and colony consumption.</li> </ul> <p>The reply of the petitioner is not satisfactory. The petitioner must have separate meters for auxiliary consumption and for consumption in the staff colonies. The petitioner is, therefore, again directed to pursue this matter diligently with</p>	30.06.2020	<p>30<sup>th</sup> September 2020 or 90 days from the normalisation of the situation whichever is later</p>

		the Discoms concerned and report compliance by 30.06.2020 else the Commission shall consider taking punitive action.		
7	<b>Directive-7:</b> Adherence to BERC (Procedure for filing Capital investment and Capitalisation plan) Regulations, 2018	In response to this directive, the Physical Completion Certificate (PCC) for 68 Nos. of completed projects have been submitted which are said to be being used and are serving the intended purpose. It has been disclosed that the sites of ICB - 26/Package F- 1/ ADB /2016 have not been completed till March 2019. It has also been submitted that the PCC of 12 sites out of 21 sites have been issued and PCC for the remaining sites would be submitted along with next year tariff petition as they were commissioned in August 2019. The PCC for the remaining sites will be issued and submitted to the Commission separately. The BSPTCL has submitted the updated Financial Closure Certificate (FCC) with details as Annexure C11. It has assured to submit the remaining FCCs shortly. The Commission has observed that the petitioner has not submitted the FCCs and certificate of assets actually put to use issued by the competent authority. As directed earlier, Commission again directs the petitioner to submit an evidence of the asset actually put to use supported by the PCC and FCC for all the works capitalised. The report may be submitted to the Commission by 30.06.2020 in respect of works commissioned in FY 2019-20.	30.06.2020	30 <sup>th</sup> September 2020 or 90 days from the normalisation of the situation whichever is later
8	<b>Directive-8:</b> Timely	There are separate treatment of IDC & IEDC in the tariff orders. On the	30.06.2020	30 <sup>th</sup>

	Completion of Projects/Schemes & proper reporting of IEDC/IDC	insistence of Commission to furnish details about them, the BSPTCL submits that IDC is being claimed for the projects that are funded through ADB loan only. Amongst the ADB funded schemes a few works have already been completed and capitalized. Projectwise status has been submitted. Commission directs the BSPTCL to get acquainted with the regulatory provisions relating to treatment of IDC & IEDC and adhere to the scheduled date of completion of the projects and indicate IDC & IEDC separately for the delayed projects in the tariff petitions.		September 2020 or 90 days from the normalisation of the situation whichever is later
9	<b>Directive-9:</b> Utilisation / Loading Levels of Transmission Assets	BSPTCL has complied with the directive and submitted that the data have been uploaded on its website on ( <a href="https://www.bsptcl.in/Noticeboard.aspx?id=41271">https://www.bsptcl.in/Noticeboard.aspx?id=41271</a> ) on 03.10.2019. While noting the compliance with satisfaction, the Commission directs the petitioner to upload the data regularly on its website which should also include Peak load, Minimum load and average load.	30.06.2020	30 <sup>th</sup> September 2020 or 90 days from the normalisation of the situation whichever is later
10	<b>Directive-10:</b> Discharge of Role of STU by BSPTCL and Preparation of Composite Power Map of Transcos	In order to allay confusion/doubts, earlier the BSPTCL was directed to submit a composite map indicating the assets/transmission lines of BSPTCL and BGCL (Two Transcos) separately. To this, BSPTCL has submitted that a detailed Composite Power Map depicting the geographical area and projects between the two	30.04.2020	30 <sup>th</sup> September 2020 or 90 days from the normalisation of the situation

		<p>Transmission Companies of the State i.e. BSPTCL and BGCL has been prepared and made available to Commission. Further it has also been submitted that regular meetings are being held at STU level with all the Transmission system users to address the common issues to identify the areas and scope of improvement.</p> <p>Commission observes that the composite transmission map as prepared by the BSPTCL (STU) does not throw complete picture and due to difficulty in interpreting it, the very purpose for which it was prepared is being defeated. Commission, therefore, again directs the BSPTCL as STU to draw the power map in association with BGCL which would clearly depict the assets/transmission lines of two Transcos separately. The Composite Power Map shall clearly depict the assets owned by them demarcated therein clearly visible colour (separate colours for assets put to use and upcoming assets). This map shall be furnished to this Commission by April 2020 and before uploading on their websites for Commission's satisfaction.</p>		<p>on of the situation whichever is later normalisation of the situation.</p>
	<p><b>Directive-11:</b> Disclosure with respect to no. of employees, total transmission lines in Ckt KM, no. of Substations and no. of bays.</p>	<p>BSPTCL has disclosed the quantitative details of transmission lines, GSS, Bays and personnel in Note 14 of the Notes to Accounts of the audited accounts for FY 2018-19.</p> <p>The compliance is noted.</p> <p>BSPTCL is again directed to include quantitative details of Number of personnel, No of substations and Transmission line length (in Ckt Km) in their audited account from FY 2019-20.</p>	30.06.2020	<p>30<sup>th</sup> September 2020 or 90 days from the normalisation of the situation</p>

				whichever is later.
	<b>Directive-12:</b> Prior approval of Capex.	The Commission has been observing that BSPTCL has been strengthening its infrastructure either under Central Government scheme or under State Government scheme without obtaining mandatory prior regulatory approval of the Commission. The Commission has also been observing that the BSPTCL has not adhering to the scheduled completion time of such capex, including time over-run/cost over-run cost in year on year ARR and truing-up violating the regulatory provisions. The Commission, accordingly, directs BSPTCL to strictly adhere to regulatory provisions with respect to Capex and Capitalisation and obtain prior regulatory approval of the Commission for the work-wise, scheme-wise capex and capitalisation giving full details of the same such as funding, scheduled completion date, etc. before starting such capex work.	30.06.2020	30 <sup>th</sup> September 2020 or 90 days from the normalisation of the situation whichever is later
13.	Any other directive related to the tariff order, whose compliance date falls on or before 30.06.2020			

#### **4 Relaxation in Timeline for filing of Review Petition**

BSPTCL respectfully submits that it is in the process of filing a Review Petition on the Tariff Order issued by the Hon'ble Commission dated 20 March 2020, in accordance with Regulation 31 (Review of decisions, directions, and orders) of the BERC (Conduct of Business) Regulations, 2005.

As stated in these Regulations, BSPTCL is allowed to file a Review Petition within 60 days from the date of passing of such Order, which is to be reviewed. The proviso also specifies that the Hon'ble Commission may relax the time period of sixty days by another 30 days if the Hon'ble Commission is convinced that BSPTCL was prevented by sufficient cause from filing the Review Petition. Owing to the pandemic situation and necessary measures taken by the Government to contain the

pandemic, BSPTCL is not functioning at full capacity and even the notary, etc., are not available, therefore, BSPTCL is not in a position to file the Review Petition in the timeline specified in the Regulation 31 (Review of decisions, directions, and orders) of the BERC (Conduct of Business) Regulations, 2005. BSPTCL requests the Hon'ble Commission to kindly grant time extension of at least 90 days from the last date for filing a Review Petition as specified in Regulation 31 (Review of decisions, directions, and orders) of the BERC (Conduct of Business) Regulations, 2005 or till the time situation normalises, whichever is later.

## **5 Prayers**

1. To admit this Petition;
2. To exempt BSPTCL from notarizing the affidavit, which is to be submitted in support of this Petition, due to the lockdown situation in the Country;
3. To exempt BSPTCL from attending any hearing, which the Hon'ble Commission may schedule on this Petition in order to comply with the guidelines issued by the Government, for maintaining social distancing;
4. To kindly exempt BSPTCL from fully complying with all such directions/conditions/Regulations applicable to BSPTCL that are issued by the Hon'ble Commission from time to time, at least by 90 days from the date of filing of this Petition or till such time the situation normalizes, whichever is later;
5. To kindly condone such delays that will incur in execution of project related works and its consequential impact on IDC and other related factors, till such time when situation normalises;
6. To kindly exempt BSPTCL from compliance of all such directives at least by 90 days from the last date of compliance as specified for the respective directives, as stated in the Tariff Order or till the time situation normalizes, whichever is later;
7. To kindly grant time extension of at least 90 days from the last date of filing a Review Petition as specified in Regulation 31 (Review of decisions, directions, and orders) of the BERC (Conduct of Business) Regulations, 2005 or till the time situation normalises, whichever is later;
8. Condone any inadvertent omissions, errors, or shortcomings and permit BSPTCL to add/change/modify/alter this filing and make further submissions as may be required at a future date; and



9. Pass such other and further Orders and any other relief as the Hon'ble Commission may deem fit, considering the facts and circumstances of the case.

**Sd/-**

**Authorised Signatory**



Place: Patna

Date: 22.05.2020