Summary of ARR & BSP Filings (Unit 1&2)

Submitted by

OPGC

For

FY 2025-26

Summary of OPGC ARR & BSP Filings for FY 2025-26

GENARATION TARIFF PROPOSAL OF OPGC FOR THE FY 2025-26

- 1. Odisha Power Generation Corporation Limited (OPGC) is a company incorporated under the Companies Act, 1956 and having its registered office at Zone-A, 7th floor, Fortune Towers, Chandrasekharpur, Bhubaneswar, Odisha-751023. GRIDCO Limited had entered into Bulk Power Supply Agreement (PPA) with OPGC dated August 13, 1996, for power purchase from its Generating Units 1 & 2, having capacity of 420 MW (210 MW x 2) of IB Thermal Power Station. OPGC, GRIDCO and Government of Odisha signed a Tripartite Agreement dated October 18, 1998 providing certain further amendments to existing PPA and other provisions including those concerning the establishment of Units 3 & 4 of IB Thermal Power Station. Further, Escrow and Security Agreement dated November 30, 1998 was entered between OPGC, GRIDCO and Union Bank of India.
- 2. Subsequently, certain disputes had arisen between the parties on issues arising from the terms of the PPA, Tripartite Agreement and other agreements between the Parties. In order to resolve these disputes, Government of Odisha constituted a Task Force vide Resolution No. 3895 dated May 7, 2007 for resolving disputes regarding tariff and other related matters. Government of Odisha, based on the recommendations of Task Force, issued Notification No. 7216 dated June 21, 2008 for resolving all such disputes on terms and conditions contained therein in regard to Unit 1 & 2 and also in regard to setting up of Unit 3 & 4, as overall settlement of all such disputes. After that, OPGC and GRIDCO agreed to amend existing PPA and Tripartite agreement based on Government of Odisha Notification dated June 21, 2008. Accordingly, an agreement was signed on September 6, 2012 as Supplemental to the Tripartite agreement executed on October 18, 1998. Subsequently, OPGC and GRIDCO signed an amendment to existing PPA on December 19, 2012 by amending certain clauses related to Plant Load Factor, Revision in tariff, etc.
- 3. OERC vide its Order dated April 27, 2015 approved the Amended PPA and directed OPGC to file an application for determination of Generation Tariff, as per approved Amended PPA, for rest of the control period starting from FY 2016-17 onwards since tariff for FY 2014-15 and FY 2015-16 has already been approved by OERC in ARR of GRIDCO. The Commission, vide its Order dated March 21, 2016 determined the Generation Tariff of Units 1 & 2 of IB Thermal Power Station for FY 2016-17, in accordance with the terms and conditions of OERC Generation Tariff Regulations, 2014.
 - 4. Aggrieved by the said Order, OPGC filed Appeal No. 126 of 2016 before the Hon'ble Appellate Tribunal for Electricity (APTEL) against the Tariff Order for FY 2016-17. Hon'ble APTEL vide its judgment dated April 6, 2017 in the stated Appeal upheld the Commission's Tariff Order for FY 2016-17. Aggrieved by the Judgment of Hon'ble APTEL, OPGC filed Civil Appeal No. 9485 of 2017 before the Hon'ble Supreme Court. The Hon'ble Supreme Court vide its judgment dated April 19, 2018 in the stated Appeal set aside the Tariff Order for FY 2016-17 and remanded the matter to the OERC for a fresh decision. In effect, the Hon'ble Supreme Court has held that primarily the tariff norms under PPA are to be

- followed in determining OPGC's tariff. Further, to the extent there are tariff norms not covered by the PPA, the 2014 Tariff Regulations may be relied upon by the OERC to determine OPGC's tariff. As per the Supreme Court judgment this arrangement would apply for entire term of subsistence of PPA i.e. till 30.06.2026.
- 5. The Commission disposed of the Generation Tariff Petition for FY 2017-18 (Case No. 62/2016) vide its Order dated March 23, 2017 and Generation Tariff Petition for FY 2018-19 (Case No. 75/2017) vide its Order dated March 22, 2018 in line with its approach adopted in the tariff determination for FY 2016-17.
- 6. In accordance with the Hon'ble Supreme Court order, OPGC has filed the Petitions for Re-determination of Tariff for FY 2016-17, FY 2017-18 and FY 2018-19 before the OERC on May 25, 2018 considering the original project cost as per the approved Amended PPA (Case No. 33 of 2018) and the final Order was issued by the Commission on March 28, 2019.
 - 7. Subsequently, OPGC filed a separate Petition numbered as Case No. 54 of 2018, for approval of additional capitalization for FY 2015-16, FY 2016-17, FY 2017-18 and FY 2018-19 in compliance to the Commission's directive in the Tariff Order for FY 2018-19 dated March 22, 2018 and Hon'ble Supreme Court order in Civil Appeal No. 9485/2017 dated April 19, 2018. In line with the approach adopted in Petitions filed in Case No. 33 of 2018 and Case No. 54 of 2018, OPGC had filed the Petition for FY 2019-20 and FY 2020-21 and the petitions were numbered as case No.70 of 2018 and case No.69 of 2019 the Commission issued the final Orders on 29.03.2019 and 22.04.2020.
 - 8. The Commission notified the OERC (Terms and Conditions for Determination of Generation Tariff) Regulations, 2020 on 26.08.2020 in exercise of the powers conferred by Section 61 and Section 62 read with Section 181 of the Act. As per these Regulations, the Tariff Period is for four years, i.e., FY 2020-21 to FY 2023-24. In accordance with the provisions of OERC Generation Tariff Regulations, 2020 and in line with the approach adopted in Petitions in Case No. 70 of 2018, Case No. 33 of 2018, Case No. 54 of 2018 and Case No. 69 of 2019, OPGC has filed the instant Petition for approval of Generation Tariff for FY 2021-22. The said Petition was numbered as Case no. 71 of 2020 and the final Order was issued by the Commission on 26.03.2021.
- 9. Further, the Commission vide order dated 21.05.2021 in Petition No. 54 of 2018 disallowed actual additional capitalization for FY 2015-16 to FY 2017-18 and proposed additional capital expenditure for FY 2018-19. OPGC has filed an Appeal before Hon'ble APTEL on 15.11.2021, as Appeal No. 335/2021 against this Commission's Order dated 21.05.2021 in Case No. 54 of 2018. The Hon'ble APTEL vide its daily order dated 15.07.2024 has kept the Appeal in the "list of short matters" and to be taken up from there, in its turn for further proceeding.
 - 10. In accordance with the provisions of OERC Generation Tariff Regulations, 2020 and in line with the approach adopted in Petitions in Case No. 33 of 2018, Case No. 70 of 2018, Case No. 69 of 2019, and Case No. 71 of 2020, OPGC had filed Petition (Case No. 75 of 2022) for approval of Generation Tariff for FY 2023-24, and the same was disposed of by the Commission vide Order dt. 23.03.2023. In

- similar line, the annual tariff Petition filed by OPGC for FY 2024-25 (Case No 112 of 2023) has been disposed of by the Commission vide Order dt. 13.02.2024.
- 11. In view of the Appeal No. 335/2021 pending before Hon'ble APTEL, OPGC had filed the Petitions (Case No. 104 of 2021 and Case No. 75 of 2022 and case no 112 of 2023) without considering the additional capitalization and prayed before the Commission for liberty to file separate Petition related to additional capitalization on the basis of decision by Hon'ble APTEL. In para 81 of Order dated 13.02.2024 in case No.112 of 2023, the Commission was pleased to consider the prayer of OPGC and allowed to file a separate Petition related to additional capitalization for the period from FY 2023-24 to FY 2024-25 after the APTEL's judgement in Case No. 335/2021 is pronounced.
- 12. Accordingly, the instant Petition is filed based on the following agreements:
 - a) Bulk Power Supply Agreement between OPGC and GRIDCO, dated 13.08.1996 ("PPA") and an agreement as Supplemental to Bulk Power Supply Agreement dated 19.12.2012 ("Amended PPA"). Both agreements were approved by the OERC vide its Order dated April 27, 2015.
 - b) Tripartite Agreement between OPGC, GRIDCO and Government of Odisha dated October 18, 1998 ("Tripartite Agreement")
 - c) Govt. of Orissa ("GoO") Notification No. 7216/E dated June 21, 2008.
 - d) Agreement as Supplemental to Tripartite Agreement dated 06.09.2012 ("Amended Tripartite Agreement") which was approved by OERC vide Order dt. 27.04.2015.
 - e) Escrow and Securitization Arrangement dt. 30.11.1998 entered between OPGC, GRIDCO & Union Bank of India approved by OERC vide Order dt. 27.04.2015.

Generation Tariff for FY 2025-26 considering the original project cost

- 13. OPGC submitted that, the Annual Fixed Cost, as per Clause 3.0 of Schedule II of the Amended PPA, shall consist of the following components:
 - a. Depreciation;
 - b. Return on Equity;
 - c. Interest on Loan;
 - d. Operation and Maintenance Expenses;
 - e. Interest on Working Capital.

Capital Cost

14. OPGC has considered capital cost of the Project as Rs. 1060 Crore for FY 2025-26 as per the Amended PPA signed between OPGC and GRIDCO.

Additional Capitalization for FY 2025-26

15. OPGC submitted that it has claimed the total additional capitalization of 128.56 Crore for FY 2015-16, FY 2016-17, FY 2017-18 (all actual as claimed in Case No. 54 of 2018), FY 2018-19 (actual as claimed in Case No 69 of 2019) and FY 2019-20 (Case No. 71 of 2020). However, Commission vide order dated 21.05.2021 in Petition No. 54 of 2018 disallowed actual additional capital expenditure for FY 2015-16 to FY 2017-18. Aggrieved by the decision of the Commission, OPGC has filed an Appeal before Hon'ble APTEL on 15.11.2021, which was registered as

- Appeal No. 335/2021 against this Commission's Order dated 21.05.2021 in Case No. 54 of 2018.
- 16. OPGC submitted that it filed a Petition (Case No. 66 of 2021) for in-principle approval of the Commission for Renovation & Modernization for enhancement of plant life and implementation of FGD and FGC for complying the revised Emission Standards as prescribed by MoEF&CC after comprehensive discussions and deliberations with GRIDCO.
 - 17. The Commission vide Order dated 03.11.2021, accorded in-principle approval for the R&M works and installation of FGD &FGC. However, as per this Order, the Commission did not approve the proposed capital expenditure of Rs.140 Cr. towards construction of a new ash pond and proposed that OPGC should use the existing ash pond and follow the mandate of Govt. of India for 100% ash utilization. Thereafter, OPGC filed a review Petition as Case No 99 of 2021 before the Commission for reconsidering construction of a new ash pond commensurate with proposed extended life of the plant and the Commission approved the construction of new ash pond. Implementation of the Renovation & Modernization and FGD and FGC has been taken up after receiving concurrence from the Board of Directors of OPGC.
- 18. In the instant Petition, OPGC has not projected any actual additional capitalisation for FY 2025-26. Based on the outcome of the Appeal filed against the Commission's order in Case No. 54 of 2018, OPGC will approach the Commission for approval of actual additional capitalisation for FY 2015-16 to FY 2023-24 and projected additional capitalisation for FY 2024-25 and FY 2025-256 through a separate petition.

Debt – Equity Ratio

19. OPGC has submitted that while approving the Amended PPA vide Order dated April 27, 2015, the Commission has approved the equity of Rs. 450 Crore and loan of Rs. 610 Crore. OPGC has considered actual debt: equity ratio, as approved in Amended PPA and considered in Tariff order for FY 2024-25, for the purpose of determination of tariff for FY 2025-26.

Depreciation

20. As the assets corresponding to Original Capital Cost of Generating Station are fully depreciated by the financial year ending March 31, 2009, OPGC has not claimed any amount towards depreciation for FY 2025-26.

Return on Equity

21. OPGC has proposed Return on Equity considering the actual amount of equity capital of Rs. 450 Crore and Return on Equity at the rate of 16% as per Clause 8.0 (10) of Schedule II of PPA. Accordingly, OPGC claimed Return on Equity of Rs. 72 Crore for FY 2025-26.

Interest on Loan Capital

22. OPGC submitted that Clause 8.0 (7) and (11) of Schedule II of the Amended PPA provides loan amount of Rs. 610 Crore and interest on loan as per actuals. Since

loan amount has been fully repaid by financial year ending March 31, 2012, OPGC has not claimed any interest on loan capital for FY 2025-26.

O&M Expenses

23. OPGC submitted that Clause 3.0 (d) and (e) of Schedule II of the Amended PPA provides that O&M expenses for first year of operation at the rate of 2.50% of the capital cost which shall be escalated by 8% each year from April 1, 1996. Accordingly, OPGC has proposed Rs. 239.92 Crore under O&M Expenses for FY 2025-26 considering the annual escalation factor of 8% as per the methodology prescribed in Amended PPA.

Interest on Working Capital

24. OPGC claimed that, Clause 3.0 (f) of Schedule II of the Amended PPA provides the details of interest on working capital. As OPGC has started availing working capital from external sources, the actual interest rate for the Working Capital facility availed by OPGC in FY 2024-25 as on September 2024 is 8.9%, which is considered for FY 2025-26. Accordingly, OPGC claimed interest on working capital as Rs. 16.86 Crore for FY 2025-26. The details are given below.

Table 1: Computation of interest on working capital for FY 2025-26 (Rs. Crore)

Sl. No.	Particulars	Amount for FY2025-26
1.	Cost of Coal for one and half months	41.01
2.	Cost of Secondary Fuel Oil for two months	9.48
3.	O&M Expenses for one month	19.99
4.	Receivables equivalent to two months	118.95
5.	Total Working Capital Requirement	189.43
6.	Interest Rate %	8.90 %
7.	Interest on Working Capital	16.86

Summary of Annual Fixed Cost

25. Considering mentioned annual fixed cost components, OPGC proposed the Annual Fixed Cost of Rs. 328.78 Crore for FY 2025-26 corresponding to the original project cost. The details are given in the Table 2 below.

Table 2: Annual Fixed Cost of OPGC for (Rs. Crore)

Particulars	Amount FY 2025-26
Depreciation	0.00
Return on Equity	72.00
Interest on Loan Capital	0.00
O&M Expenses	239.92
Interest on Working Capital	16.86
Total Annual Fixed Cost	328.78

Operational Performance Parameters

26. The norms of operation proposed for FY 2025-26 by OPGC as per Clause 8 of Schedule II of the approved Amended PPA are given in Table 3 below.

Table 3: Operational Performance Parameters for FY 2025-26

Sr. No.	Particulars	Unit	Value
1.	Normative Availability	%	68.49%
2.	Target Plant Load Factor for incentive	%	80.00%
3.	Auxiliary Consumption	%	9.50%
4.	Station Heat Rate	kcal/kWh	2500
5.	Specific Oil Consumption	ml/ kWh	3.50

Plant Load Factor (PLF)

27. As per Clause 3.0(g) of schedule II of the Amended PPA, Normative level of generation. Accordingly, OPGC has considered the PLF of 68.49%, equal to normative Availability, the Generation plan submitted to GRIDCO, the ex-bus generation projected for FY 2025-26 is 2,764.07 MU which corresponds to gross PLF of 84.37%. Incentive for higher PLF for FY 2025-26 shall be claimed in accordance with the provision of the Amended PPA.

Fuel Prices & GCV

- 28. During FY 2025-26, the entire coal requirement for OPGC Unit 1&2 is planned to be met through a combination of the coal supply under existing FSA with Mahanadi Coal Fields Limited from Lakhanpur mines and Addendum Agreement FSA with Odisha Coal and power Limited ("OCPL") from Manoharpur mines. In line with the Judgement of the Hon'ble Supreme Court of India dated 18.04.2018 in Civil Appeal No. 9485 of 2017, variable costs for OPGC are to be determined as per the PPA. As per the provision of PPA, the GCV of Oil and Coal is to be considered as actually delivered to the power station. Accordingly, OPGC has considered the GCV of coal and oil as actually delivered to the power station for the computation of energy charges.
 - Since May 2017, the declared grade of Coal of Lakhanpur mines as notified by MCL was G-14. Considering OPGC's request and actual quality of coal received from Lakhanpur Mines, MCL has revised back declared grade of coal of Lakhanpur (Lajkura) mines from G-12 to G-14 for FY 2024-25 effective from 10.05.2024. Further, OCPL proposed OPGC to utilize a portion of this surplus coal in Units-1&2 in addition to Units-3&4 subject to the approval of Ministry of Coal, Govt. of India. GRIDCO vide its letter No. 191(3) dated 29.11.2023 accorded its in-principle consent for sourcing of coal from OCPL for use in Units-1&2 with the condition that input price of coal from OCPL would not exceed the price of linkage coal availed from MCL. Further, to OCPL's request, the Ministry of Coal vide its letter dated 20.03.2024 approved supply of 1.35 MTPA coal from OCPL's Manoharpur coal mine to Units-1&2. Subsequently, pursuant to the Clause 21.12 of the FSA dated 31.03.2022 executed between OCPL and OPGC for Units 3&4, a supplementary FSA was executed between OCPL and OPGC on 18.05.2024 for the supply of coal from the OCPL mines to end use plants of OPGC Units-1&2 effective till 31.03.2030. On the other hand, MCL vide its letter no. 677 dated 10.09.2024 has confirmed OPGC regarding reduction of ACQ from 2.7 MT to 1.158 MT for FY 2024-25.

30. Further, Clause 9 of Schedule II of the PPA stipulates that the prices and GCV of oil and coal for one year shall be the base for the next year. Accordingly, OPGC has considered the actual weighted average prices and GCV of oil and coal for the period April to September 2024 for purpose of computation of tariff in the instant Petition. Accordingly, the price and GCV of coal and oil considered for FY 2025-26 have been given in the table below.

Table 4: Price and Gross Calorific Value of Coal and Oil proposed for FY 2025-26

Sl. No.	Source of Coal	Base for FY 2025-26
1	Price of Coal (Rs. /MT)	1,697.31
2	Price of LDO (Rs./kL)	81,711.23
3	Price of HFO (Rs./kL)	62,584.89
4	Gross Calorific Value of Coal (kCal/kg)	3,213.85
5	Gross Calorific value of LDO (kCal/ltr.)	10,000.00
6	Gross Calorific value of HFO (kCal/ltr.)	10,000.00

Energy charges

31. OPGC proposed that, in accordance with Clause 7.0 of Schedule II of the Amended PPA, it has considered the norms of operation, GCV and prices of the fuel for computation of Energy Charge for FY 2025-26. Accordingly, it has proposed Variable charges of 168.79 paise/kWh for FY 2025-26. The details are given in table 5 below.

Table 5: Computation of Energy Charge for 2025-26

Particulars	Unit	Value for FY2025-26
Auxiliary Consumption	%	9.50%
Gross Station Heat Rate	kCal/kWh	2500
GCV of Coal	kCal/kg	3,213.85
GCV of Oil (LDO)	kCal/ltr	10,000
GCV of Oil (HFO)	kCal/ltr	10,000
Specific Coal Consumption	kg /kWh	0.77
Specific Oil Consumption-LDO	ml/kWh	0.35
Specific Oil Consumption-HFO	ml/kWh	3.15
Price of Coal	Rs. / MT	1,697.31
Price of Secondary Oil-LDO	Rs. / kL	81,711.23
Price of Secondary Oil-HFO	Rs. / kL	62,584.89
Variable Charges per kWh(base value)	Paisa/kWh	168.79

Reimbursement of Other Charges

32. OPGC proposed for reimbursement of the different charges and expenses which comprise of Electricity duty, water cess and charges, tax and cess on land, SOC and MOC paid to SLDC, EPRC charges, annual inspection fees, Income tax, recovery of ARR and tariff petition fees and publication expenses and expenses towards ash transportation and other expenses for ash utilization as per Clause 10 of the approved amended PPA considering either the projected figures for the year or the actual figures of 2023-2024. The details are given in Table 6 below:

Table 6: Other Charges for FY 2025-26, considering original project cost (Rs. Crore)

Sl. No.	Particulars	Amount
1.	Electricity Duty	15.37
2.	Water Cess and Water Charges	11.01
3.	Tax and Cess on land	0.25
4.	SOC and MOC for SLDC	0.49
5.	ERPC Charges	0.16
6.	Annual inspection fees	0.44
7.	Income Tax	24.22
8.	Recovery of ARR & Tariff Petition Fee	0.30
9.	Ash Utilization Expenses including Transportation Charges	59.94
	Total	112.17

- 33. OPGC requested to provisionally approve other charges of **Rs. 112.17 Crore** and further requested to direct GRIDCO to reimburse other charges on actual basis.
- 34. Against OPGC's claim for reimbursement of an amount Rs 6.13 Crore in FY 2023-24 and FY 2024-25 towards contribution to water conservation fund, the Commission was not inclined to approve any amount as no payment were made by OPGC in the previous years. The Petitioner has not made payment towards WCF in FY 2023-24. Therefore, no amount has been considered toward WCF for FY 2025-26. However, OPGC requests the Commission to allow for reimbursement of such amount, if any, paid during FY 2025-26.

Summary of Tariff proposal for FY 2025-26

35. The Summary of tariff proposed by OPGC for FY 2025-26 is given in the table-10 and other charges for FY 2025-26 in the table 11 below.

Table 7: Summary of Tariff Proposal of OPGC for FY 2025-26

Particulars	Units	Corresponding to original project cost
Depreciation	Rs. Crore	0.00
Return on Equity	Rs. Crore	72.00
Interest on loan	Rs. Crore	0.00
O&M expenses	Rs. Crore	239.92
Interest on working capital	Rs. Crore	16.86
Total Annual Fixed Cost	Rs. Crore	328.78
Variable Charges per kWh	Paisa/kWh	168.79
Other Charges	Rs. Crore	112.17

- 36. OPGC has provided following compliance of directives of the Commission:
 - i. Status of new Ash Pond:

Ash level in Ash-pond C has reached approximately 207 m RL and OPGC is working on raising the embankment capacity (208.0m to 211.0 m RL). The operational life of this pond is expected to be exhausted by December 2026 and land acquisition for new ash pond D is underway, with possession expected by June 2025. Moreover, OPGC has installed Flue Gas Desulfurization (FGD) and Flue Gas Conditioning (FGC) system. A feasibility study was conducted, but

- the tendering process is on hold due to CSIR-NEERI's recommendations regarding installing FGD systems.
- ii. Report on Collapse of Ash Pond-C:
 The Ash-pond C dyke for the length of 40 meters was breached on 09.12.2023 at 08.30 hrs. Which was accidental and happened unexpectedly and without any prior indication /warning. Ash Pond C flown to neighboring land to the spillage

of 6.0 lakh MT of ash, resulting in a loss of 195 MU of generation. The breach caused an under-recovery of Rs. 1.56 Cr for FY 23-24 of Capacity charges. Rs. 32.23 Cr was the restoration costs, which have been claimed under insurance. Ash Pond C was restored and taken into service by April 2024, with strengthened safety measures to prevent recurrence.

- iii. Renewable Energy for reduction of carbon footprint and RGO Compliance: OPGC is pursuing renewable energy projects, including a 50 MW solar PV project at Ash Pond-B and feasibility studies for additional solar and bio-gas plants. Bio-Gas plant with waste feeding capacity of 1MT/day releases 3 cylinders of gas/day (42 kg/day). Moreover, OPGC is preparing to meet the Renewable Generation Obligation (RGO) by setting up renewable energy projects aligned with the Ministry of Power's guidelines.
- iv. Efforts being made to ensure proper disposal of ash in accordance with the notifications and directives issued by the MoEF&CC and the MoP from time to time. OPGC has been pursuing options for fly ash disposal in mine voids, but proposals to MCL for mine allocation have been declined. OPGC has identified abandoned stone quarries and other mines as alternatives, but these efforts have also faced setbacks. OPGC requests the Commission to direct MCL and Government of Odisha to allocate suitable sites for ash disposal.
- v. Provided the number of forced outages of generating units, repetition of such incidents in last 5 years, reason for such outage and remedial measures taken so that such incidents won't be repeated. Remedial measures such as Root cause analysis, Trip Analysis, reliability and performance improvements, Stringent Parameter Monitoring, Residual Life Assessment, Critical Spare Parts Inventory, and Skill Development Programs are taken up to minimize outages.

Prayer

- 37. OPGC has prayed to the Commission to approve the following for FY 2025-26:
 - a. Admit the instant Petition.
 - b. Approve the tariff, including annual fixed cost and base variable charges, for FY 2025-26 as claimed in the Petition.
 - c. Approve the other charges for FY 2025-26 as claimed in the Petition and recovery of other charges on actual basis during FY 2025-26.
 - d. Approve recovery of FPA in accordance with approved PPA during FY 2025-26.
 - e. Allow OPGC to file a separate Petition regarding additional capitalization from FY 2024-25 to FY 2025-26 after the Hon'ble APTEL pronounce Judgment in Appeal No 335/2021 filed by OPGC.
 - f. Condone any inadvertent omissions, errors, short comings and permit OPGC to add/ change/ modify/ alter this filing and make further submissions as may be required at a future date; and
 - g. Pass such other and further Orders as deemed fit and proper in the facts and circumstances of the case.