



Registrar

National Electric Power Regulatory Authority

Islamic Republic of Pakistan

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No. NEPRA/R/ADG(Trf)/TRF-308/HSRPEL-2015/25107-25111

May 18, 2021

Chief Executive
Huaneng Shandong Ruyi (Pakistan) Energy (Pvt.) Ltd.
House No. 4, A, Street No.20,
F-8/2, Islamabad
Phone: (03000 805869, 0310 7878539

Subject: Decision of the Authority in the matter of Motions for Leave for Review filed by Huaneng Shandong Ruyi (Pakistan) Energy (Private) Limited (HSR) against the Decisions of the Authority in the matter of Monthly Fuel Price Adjustment from October 2020 to March 2021 [Case No. NEPRA/R/TRF-308/HSRPEL-2015]

Enclosed please find herewith the subject decision of the Authority along with Annexures-1a-1b, 2a-2c, 3a and 4a-4b (15 Pages), pertaining to Schedules of Fuel Cost Part of Energy Charge, Details of Shipments and Marine Freight Calculations regarding the revised fuel price adjustment on account of Coal price variation for the period from **October 2020 to March 2021** in respect of Huaneng Shandong Ruyi (Pakistan) Energy (Private) Limited.

2. There shall be no change in the approved fuel cost components for the months of January 2021 and March 2021.

Enclosure: As above


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(Syed Safer Hussain)

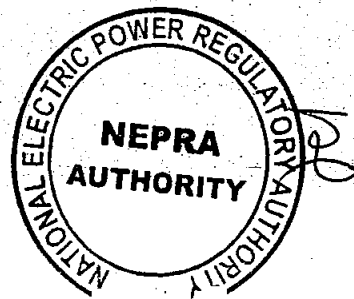
CC:

1. Secretary Ministry of Energy (Power Division), 'A' Block, Pak Secretariat, Islamabad
2. Secretary, Cabinet Division, Cabinet Secretariat, Islamabad
3. Secretary, Ministry of Finance, 'Q' Block, Pak Secretariat, Islamabad.
4. Chief Executive Officer, Central Power Purchasing Agency Guarantee Limited, Shaheen Plaza, 73-West, Fazl-e-Haq Road, Islamabad.

Decision of the Authority in the Matter of Motions for Leave for Review Filed by Huaneng Shandong Ruyi (Pakistan) Limited Against the Decisions of the Authority in the Matter of Monthly Fuel Price Adjustment from October 2020 to March 2021

1. Background

- 1.1. Huaneng Shandong Ruyi (Private) Company Limited (HSR) has set up a 2x660MW power plant at Qadirabad, Sahiwal, Punjab. The Authority approved upfront coal tariff of HSR vide its decision dated March 31, 2015. HSR commenced commercial operation on October 28, 2017. The decision pertaining to tariff adjustment at COD was issued on January 17, 2019.
- 1.2. The Authority, in its decision dated August 22, 2019 in the matter of Motions for Leave for Review against monthly fuel price adjustment decisions, decided to allow US\$ 4.67/ton on account of coal handling charges as invoiced by Pakistan International Bulk Terminal (PIBTL) in addition to royalty charges of US\$ 2.27/ton (Total US\$ 6.94/ton). The coal handling charges consist of US\$ 3.22/ton for vessel handling and US\$ 1.45/ton for ancillary service charges. In addition to that, Rs. 7.8/ton were also included in the port handling charges on account of clearing and forwarding charges. Similar port handling charges have been allowed for coal handled by HSR at marginal wharfs 3 & 4 (dedicated port) of Port Qasim Authority (PQA).
- 1.3. Lucky Commodities, an associated company of Lucky Electric Power of 660MW, vide its letter No. LCPL/20-21/40 dated October 05, 2020 brought the issue of ancillary services charges of US\$ 1.01/ton in excess of PIBTL's approved tariff of US\$ 5.49/Ton and requested to direct Port Qasim Authority (PQA) to regulate PIBTL charges.
- 1.4. The issue of published ancillary services charges of US\$ 1.01/ton (published in September/October 2020 on PIBTL website) against the charging of US\$ 1.45/ton by PIBTL in case of HSR and discounts given in case of other power plants was discussed with HSR and PIBTL. PIBTL informed that they are providing additional services to HSR e.g. additional storage, shifting services etc. thereby charging full ancillary services tariff. In addition to these, wharfage charges and SGS charges on account of commodity inspection and ash fusion temperature inspection is also paid by PIBTL and accordingly charging US\$ 1.45/ton under an agreement with HSR. Similar response is provided by HSR.
- 1.5. The issue was deliberated and analysed. The first shipment at PIBTL was handled in February 2018. The prevailing exchange rate was Rs. 110.51/USD. The notified Wharfage payable to PQA was Rs. 34/ton (translated into US\$ 0.31/ton) and SGS charges were Rs. 14.45/ton (translated into US\$ 0.13/ton). By adding ancillary services charges of US\$ 1.01/ton, the total works out US\$ 1.45/ton and the same was allowed in accordance with the invoice by PIBTL. With the change of exchange rate from Rs. 110.5/USD to Rs. 166.48/USD, the wharfage charges and SGS charges have changed to US\$ 0.20/ton and US\$ 0.09/ton respectively maintaining the same PKR. The total in terms of dollars including ancillary services charges works out US\$ 1.30/ton against the invoiced amount of US\$ 1.45/ton.
- 1.6. Accordingly, in the fuel price adjustment for October 2020, published ancillary service charges of US\$ 1.01/ton was allowed and wharfage and SGS charges were allowed as per actual as separate items. The total cost allowed on three accounts was US\$ 1.30/ton as against the invoice of US\$ 1.45/ton. The breakup of these charges is as under:



Description	Feb 2018			Sept 2020		
	Rs./Ton	Ex Rate	US\$/Ton	Rs./Ton	Ex Rate	US\$/Ton
Ancillary Services	-	-	1.01	-	-	1.01
Wharfage	34	110.51	0.31	34	166.48	0.20
Inspection	14.45	110.51	0.13	14.36	166.48	0.09
Total			1.45			1.30

1.7. Similar cost was allowed for all shipments handled at the dedicated port i.e. marginal wharf 3&4.

2. Filing & Admission of Motion for Leave for Review

2.1. Being aggrieved of the decision of the Authority with respect to ancillary service charges, HSR filed motions for leave for review (MLRs) against monthly fuel price adjustment decisions as per detail provided hereunder:

Month	Decision Date	Review Date	Admission Date
October 2020	09/11/2020	26/11/2020	24/12/2020
November 2020	08/12/2020	18/12/2020	14/01/2021
December 2020	05/01/2021	25/02/2021	07/04/2021
January 2021	03/02/2021		
February 2021	01/03/2021	04/03/2021	
March 2021	01/04/2021	09/04/2021	-

3. Grounds of Appeal

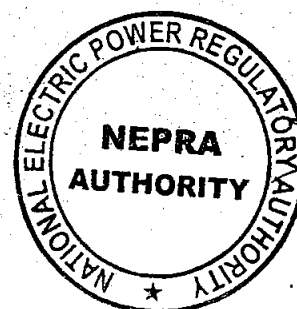
3.1. The Petitioner requested the Authority to review its decision in respect of reduction in ancillary service charges on the following grounds:

- Contravention of Due Process
- Principles and Standards of Tariff Determination
- Commercial and Technical Realities
- Principle of Estoppel and Legitimate Expectation to Rely on Previous Fuel Price Adjustments

3.2. In addition to the above grounds, HSR vide MLR against November 2020 FPA decision raised the issue of delivery days of 30.86 approved for shipment No. 227 as compared to 35.17 days and requested to review the impugned order and reverse the same on adjustments on account of port handling days.

4. Hearing

4.1. Hearing in the matter was scheduled for January 13, 2021. Notice of Hearing was issued to the Petitioner, CPPA-G, Port Qasim Authority (PQA), Pakistan International Bulk Terminal Limited (PIBTL), Private Power and Infrastructure Board (PPIB), Lucky Commodities (Private) Limited, China Power Hub Generation Company (Pvt.) Limited (CPHGCL) and FFBL Power Company Limited (FPCL).



- 4.2. Hearing was held as per schedule and was attended by the representatives of the Petitioner, PIBTL, and CPHGCL.

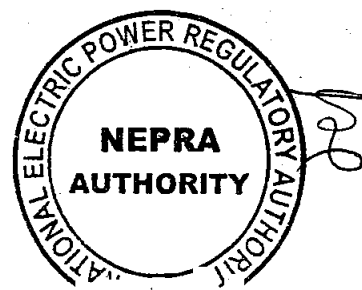
5. Post Hearing Submissions

Pakistan International Bulk Terminal (PIBTL)

- 5.1. PIBTL vide letter No. PIBTL/PQA/2024/21 dated January 20, 2021 submitted clarification of ancillary service charges of US\$ 1.45/Ton.
- 5.2. According to PIBTL, lump sum amount of US\$ 1.45/Ton is an incentivized wholesome package for the benefit of HSR which covers various project specific services including wharfage and SGS inspection.
- 5.3. According to PIBTL, US\$ 1.45/Ton cannot be broken into separate components of ancillary services charges, wharfage and SGS inspection charges as such a breakdown was not within the contemplation of the parties at the time the contract was negotiated. US\$ 1.45/Ton was arrived keeping in mind specific needs of the customer such as:
- Efficiently moving the cargo in sufficient volumes to the Marshalling Yard, Pipri (MYP) to meet the requirements of the PRFTC.
 - Allowing for weighing and shifting cargo multiple times.
 - Facilitating on account of additional free storage days over and above those agreed under the contract between PIBTL and HSR.
- 5.4. According to PIBTL, the schedule of tariff published on its website is the standard tariff applicable to those customers who have not entered into any agreements with it. The schedule of tariff published on PIBTL's website states that *"The Company will charge an extra amount if requested to provide any additional services which are not provided as per normal applicable SOPs"*. PIBTL is also entitled to storage charges of US\$ 0.20/Ton per day for storage after initial 5 days of standard free storage days offered by PIBTL to its customers. However, HSR is allowed 15 free storage days and in certain cases additional free storage days are allowed. Therefore, if standard tariff was imposed on HSR, the charges would far exceed the existing charges of US\$ 1.45/Ton.
- 5.5. According to PIBTL, both parties were fully cognizant of the exchange rate risk/fluctuation given that the commercial arrangement between the parties is in US Dollar. Moreover, the existing rate risk works both ways i.e. if the Pakistani rupee were to appreciate against the US Dollar, the costs incurred by HSR would be lowered but the contract price in US Dollars would remain unchanged.

Huaneng Shandong Ruyi (Private) Company Limited

- 5.6. HSR was directed, during the hearing, to provide financial impact of benefit derived by negotiating a lump sum deal instead of paying additional storage charges of US\$ 0.20/Ton/Day.
- 5.7. HSR vide letter No. HSR-SW-2021-005 dated January 27, 2021 submitted that considering its unique coal handling arrangement, it has negotiated 15-20 days free storage time with PIBTL in good faith which results in saving of US\$ 2.75/Ton as provided below:



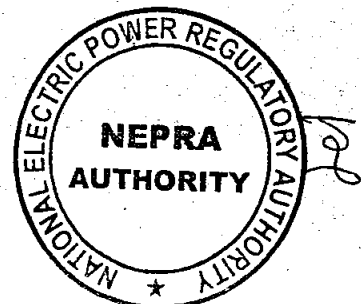
Particulars	
Average Storage Time	19.74 days
Standard Free Time	5 days
Extra Days a PIBTL Storage Yard	14.74 days
Extra Cost based on US\$ 0.20/Ton/Day	US\$ 2.95/Ton
Incremental Cost based on PIBTL Schedule of Tariff	US\$ 0.15/Ton
Overall Savings by HSR	US\$ 2.75/Ton

- 5.8. HSR submitted information of all vessels handled at PIBTL till date. HSR also submitted copy of agreement signed with PIBTL for coal handling for the period September 01, 2020 to December 31, 2021.
- 5.9. HSR vide letter No. HSR-SW-2021-009 dated February 15, 2021 submitted cumulative financial impact of savings of US\$ 5.4 million from all shipments handled between 2018 to 2020.

6. Analysis of Grounds of Review

Contravention of Due Process

- 6.1. According to HSR, the Authority in its letter dated November 6, 2020 stated that it has come to its knowledge that as per schedule of tariff recently published by PIBTL on its website, the tariff for ancillary services is US\$ 1.01/Ton and that PIBTL is charging lower tariff to other power plants and providing discounts on the ancillary service charges on case to case basis. Therefore, the Petitioner is directed to clarify why PIBTL is charging higher ancillary charges to the Petitioner instead of providing discounts in line with other power plants. Instead of permitting the Petitioner to provide a response, the Authority issued its decision 3 days later, slashing the said charges.
- 6.2. According to the Petitioner, as prescribed under the Tariff Rules, the Authority is required to allow a petitioner to present arguments and evidence in support of its pleadings as well as any additional issues that are framed by the Authority during the course of such proceedings. It is imperative to note that the objective of holding hearings in relation to a petition is to achieve a just and informed decision.
- 6.3. According to HSR, despite the provision of evidence by (i.e. the invoice issued by PIBTL in relation to the port handling charges / ancillary service charges), the Authority chose to reduce such charges without any further investigation and it was only upon receipt of the letter and the decision that the reduction of the port handling charges came to its knowledge.
- 6.4. The submissions of the Petitioner have been examined. It is pertinent to mention that the reduction was not made on the basis of discount allowed to other power projects by PIBTL, rather the reduction was made on account of exchange rate factor as explained above. Before deciding the matter, detailed discussions were made with both the Petitioner and PIBTL to analyze and bifurcate the lump sum ancillary service charges of US\$ 1.45/ton. Further, the Petitioner availed the opportunity of review and the same was admitted for further processing in line with the due process provided in the Rules & Regulations. Therefore, the submissions of the Petitioner are not maintainable on this account.



Principles & Standards of Tariff Determination

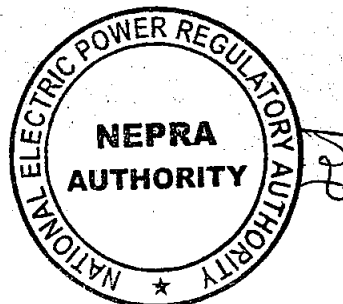
- 6.5. According to the Petitioner, under the NEPRA Act, the Authority is required to, *inter alia*, “ensure efficient tariff structures for sufficient liquidity in the power market”. Efficient tariff structures are intrinsically linked to allowing full recovery of costs. Therefore, if the current ancillary service charges continue to be charged by PIBTL, and the same are not maintained by the Authority, this would be a violation of the provisions of the NEPRA Act.
- 6.6. The submissions of the Petitioner have been examined. There is no justification to freeze rupee based cost in US dollar. As per NEPRA Act, Rules and Regulations only prudent costs can be allowed. Accordingly, the actual rupee based cost was allowed along with the dollar denominated charges. Therefore, the submissions of the Petitioner are against the factual position and are not maintainable.

Commercial & Technical Realities

- 6.7. According to the Petitioner, it appears that the other power projects referred to in the NEPRA’s letter dated November 6, 2020 is CPHGCL and whilst the schedule of tariff published on PIBTL’s website may be applicable for CPHGCL, the Petitioner understands from PIBTL that it is charged a different rate due to the following reasons:
- i. After unloading, CPHGCL’s coal is evacuated from the terminal within 5 days through trucks, while in case of HSR evacuation of coal is dependent on availability of train by Pakistan Railway Freight Transportation Company (PRFTC) due to which 15-20 days are required for evacuation.
 - ii. Due to the extra free time allowed to it by PIBTL, coal at the terminal has to be moved by PIBTL to accommodate commodities from other incoming ships, which increases the cost
 - iii. PIBTL has a unique position at Port Qasim and there is no benchmark/competition against which tariff could possibly have been compared with and subsequently negotiated. Further as per the tariff schedule published on PIBTL’s website, it retains the right to charge any client differently.
 - iv. Over the period of last 12 months, average logistical cost, of CPHGCL is US\$ 31/Ton while that of HSR is US\$ 24/Ton.
- 6.8. The submissions of the Petitioner have been examined and found irrelevant as deduction in ancillary service charges was not made by comparing it with that of CPHGCL. The deduction was made in light of the published schedule of tariff of PIBTL. Therefore, the submissions of the Petitioner are not maintainable.

Principle of Estoppel and Legitimate Expectation

- 6.9. According to the Petitioner, the decision of the Authority, to the extent of the reduction of the port handling charges, is also in contravention to the doctrine of legitimate expectation.
- 6.10. The Petitioner submitted that reduction of the port handling charges without cause is an arbitrary act of the Authority, which outrightly contravenes the legitimate expectation created by the previous decisions.

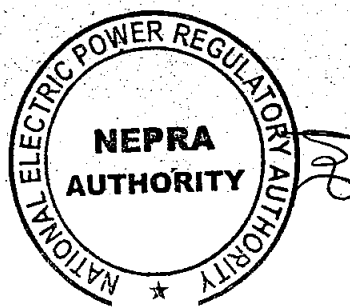


6.11. The submissions of the Petitioner have been examined. As stated above, reduction in ancillary service charges was made in light of discovery of new and important information which needed to be addressed. HSR was allowed US\$ 1.45/Ton in respect of ancillary service charges in the past on the basis of PIBTL's invoice. PIBTL published its schedule of tariff in September/October 2020 which was inconsistent with its invoice. Accordingly, the relevant costs were reassessed and incorporated in the coal price in exercise of powers conferred under the NEPRA Act, Rules and Regulations. The submissions of the Petitioner are not maintainable.

7. Decision of the Authority

- 7.1. The Authority has examined the submissions made by HSR and PIBTL. As per clause 3(b) of the agreement between HSR and PIBTL, HSR is allowed 15 days initial storage period as compared to 5 days initial period allowed to other power projects. As per the published Schedule of Tariff, PIBTL is entitled to charge US\$ 0.20/ton per day for additional storage facilities. As per the information provided by HSR, 40 vessels had been handled at PIBTL during 2018 to 2020. HSR further submitted that once the coal is unloaded, it remains at PIBTL storage area until the Pakistan Railway Freight Transportation Company make available the coal trains for loading at Marshal Yard Pipri which is 20km away from PIBTL. The actual time taken ranges from 6.54 days to 45.11 days with average 20 days. According to HSR, the existing arrangement with PIBTL has saved US\$ 2.75/ton and in total US\$ 5.4 million till date.
- 7.2. Keeping in view facts of the case, the Authority has decided to allow the ancillary service charges of US\$ 1.16/Ton with actual wharfage and SGS charges in Rupees subject to maximum of US\$ 1.45/Ton at applicable exchange rate for all shipments handled at PIBTL. Since there is no storage issue at Marginal Wharf 3 & 4, therefore, the Authority has decided to maintain the ancillary service charges of US\$ 1.01/Ton with actual wharfage and SGS charges in Rupees.
- 7.3. The submission of the Petitioner with respect to port days pertaining to Shipment No. 227 has been examined. An error has been identified in the application of unloading rate of 30,000 tons/day as against the approved unloading rate of 10,000 tons/day at Marginal Wharf 3&4. Accordingly, the marine freight for Shipment No. 227 has been recalculated by applying unloading rate of 10,000 tons/day. Out of total quantity of the subject shipment, 37,053 tons were consumed in November 2020 and 2,910 tons were consumed in December 2020. Accordingly, the fuel cost components of November 2020 and December 2020 have been revised.
- 7.4. Based on the decision taken in the preceding paragraphs, the revised fuel cost components for each month have been worked out and are provided hereunder:

FCC Month	FCC Approved (Rs./kWh)	FCC Revised (Rs./kWh)
October 2020	6.7507	6.7539
November 2020	6.8655	6.8809
December 2020	6.8608	6.8621
February 2021	8.8150	8.8169



7.5. There shall be no change in the approved fuel cost components for the months of January 2021 and March 2021.

8. Order

8.1. In pursuance of Section 7 read with Section 31 of NEPRA Act, the Authority hereby determines and approves the following revised fuel cost components for each month:

FCC Month	FCC Approved (Rs./kWh)	FCC Revised (Rs./kWh)	Annexure
October 2020	6.7507	6.7539	1a, 1b,
November 2020	6.8655	6.8809	2a, 2b, 2c
December 2020	6.8608	6.8621	3a
February 2021	8.8150	8.8169	4a, 4b,

NOTIFICATION

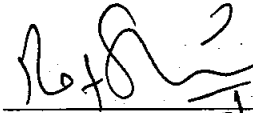
The revised tariff components along with 8 annexure are to be notified in the official gazette in accordance with the provisions of Section 31(7) of the Regulation of Generation, Transmission and Distribution of Electric Power Act 1997.

AUTHORITY



Rehmatullah Baloch
Member

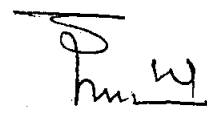
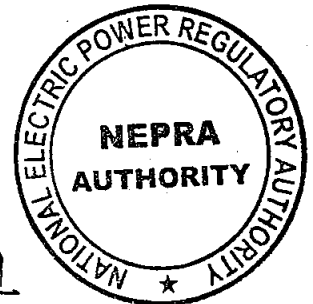
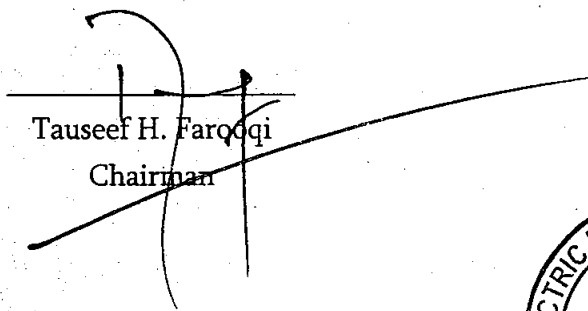
28/4/21



Engr. Rafique Ahmed Shaikh
Member

28/4/21

Tauseef H. Farooqi
Chairman



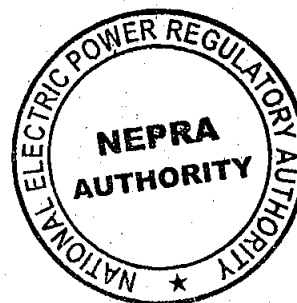
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Huaneng Shandong Ruyi Energy (Private) Company Limited
Schedule of Fuel Cost Part of Energy Charge
Adjustment on Account of Coal Price Variation for the Month of October 2020

Description	Quantity	Net CV	Coal Price		Exchange Rate
	Ton	kCal/Kg.	US\$/Ton	Rs/Ton	Rs./US\$
Consumption from Stock:					
Consumption from Shipment No. HSR 221	33,219	5,671	108.15	18,209	168.37
Consumption from Shipment No. HSR 222	38,356	5,965	109.34	18,410	168.37
Consumption from Shipment No. HSR 223	58,874	5,872	108.69	18,095	166.48
Consumption from Shipment No. HSR 224	37,163	5,820	109.63	18,252	166.48
Consumption from Shipment No. HSR 225	6,441	5,529	106.05	17,655	166.48
Total Consumption	174,053	5,830	108.84	18,203	167.26

Description	Unit	Reference	Previous	Revised
Avg. price of stock consumed during the month	Rs./Ton	13,605	18,133	18,203
Avg. net calorific value of stock consumed during the month	kCal/Kg	5,990	5,803	5,830
Avg. net calorific value of stock consumed during the month	BTU/Kg	23,768	23,026	23,136
Net Heat Rates	BTU/kWh	8,584	8,584	8,584
Revised Fuel Cost Component for October 2020	Rs./kWh	4.9135	6.7598	6.7539

Note: The above adjustment of fuel cost component on coal shall be subject to verification by a consultant/Independent third party to be appointed for the purpose by the Authority. In case the verified delivered coal price is different, the fuel cost component shall be revised accordingly.

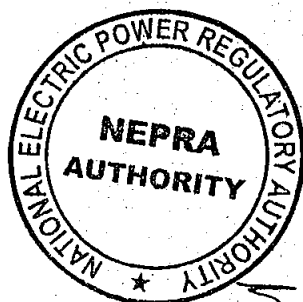


Huaneng Shandong Ruyi Energy (Private) Company Limited

Details of Shipments

For the month of October 2020

Shipment Number		HSR 222	HSR 223	HSR 224	HSR 225
Vessel Name		SSI VICTORY	SBI HERMES	AFRICAN WAGTAIL	SSI TRIUMPH
Bill of Lading (B/L) Date		27-Aug-20	7-Sep-20	7-Sep-20	19-Sep-20
L/C / TT Number		ICBC/LHE/RGC/2 0200907-01	ICBC/LHE/RGC/2 0200917-01	ICBC/LHE/RGC/2 0200917-02	ICBC/LHE/RGC/2 0200929-01
Origin		South Africa	South Africa	South Africa	South Africa
API-4 Index for the month of B/L Date		55.10	57.03	57.03	57.03
Base Calorific Value	kCal/Kg	6,000	6,000	6,000	6,000
Actual Calorific Value	kCal/Kg	5,965	5,872	5,820	5,529
Quantity	MT	38,748	59,511	40,483	40,408
FOB Coal Price API-4 Index as per B/L month Adjusted for CV	US\$/Ton	54.78	55.81	55.32	52.55
Adjustment for Sulphur Content	US\$/Ton	-	-	-	(0.06)
Discount	US\$/Ton	-	-	-	-
Marine Freight Charges	US\$/Ton	15.52	10.45	15.18	14.51
Marine Insurance	US\$/Ton	0.07	0.06	0.07	0.06
CIF Coal Price	US\$/Ton	70.37	66.32	70.56	67.07
Handling Loss 1% or actual whichever is minimum	US\$/Ton	-	-	-	-
CIF Coal Price with losses at Karachi	US\$/Ton	70.37	66.32	70.56	67.07
Other Charges:	US\$/Ton	13.33	16.46	13.15	13.09
(i) Port Handling Charges	US\$/Ton	4.23	4.38	4.23	4.23
(ii) Port Qasim Royalty Charge	US\$/Ton	2.40	2.27	2.40	2.40
(iii) Customs Duties & Cess	US\$/Ton	4.87	4.42	4.80	4.52
(iv) L/C / TT Charges	US\$/Ton	0.10	0.10	0.10	0.10
(v) PDA Charges at Load Port	US\$/Ton	0.56	0.40	0.43	0.61
(vi) PDA Charges at Discharge Port	US\$/Ton	0.85	0.62	0.85	0.90
(vii) Transportation & Loading charges	US\$/Ton	-	3.94	-	-
(viii) Freight Forwarding/Custom Clearance	US\$/Ton	0.05	0.05	0.05	0.05
(ix) Wharfage Charges	US\$/Ton	0.20	0.20	0.20	0.20
(x) Commodity & Ash Fusion Temperature Inspection	US\$/Ton	0.09	0.09	0.09	0.09
Inland Freight Charges	US\$/Ton	24.56	24.84	24.84	24.84
Delivered Coal Price before adjustment of Handling Loss	US\$/Ton	108.26	107.62	108.55	105.00
Handling Loss 1% or actual whichever is minimum	US\$/Ton	1.08	1.08	1.09	1.05
Delivered Coal Price with losses at Power Plant	US\$/Ton	109.34	108.69	109.63	106.05
Exchange Rate	Rs./US\$	168.37	166.48	166.48	166.48
Delivered Coal Price with losses at Power Plant	Rs./Ton	18,409.95	18,095.42	18,251.77	17,655.01

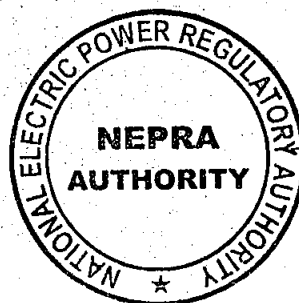


Huaneng Shandong Ruyi Energy (Private) Company Limited
Schedule of Fuel Cost Part of Energy Charge
Adjustment on Account of Coal Price Variation for the Month of November 2020

Description	Quantity	Net CV	Coal Price		Exchange Rate
	Ton	kCal/Kg.	US\$/Ton	Rs/Ton	Rs./US\$
Consumption from Stock:					
Consumption from Shipment No. HSR 225	30,628	5,529	106.05	17,655	166.48
Consumption from Shipment No. HSR 226	33,689	5,768	109.05	18,155	166.48
Consumption from Shipment No. HSR 227	37,053	5,661	108.58	18,077	166.48
Consumption from Shipment No. HSR 228	27,225	5,762	112.55	18,396	163.45
Total Consumption	128,595	5,679	108.94	18,064	165.84

Description	Unit	Reference	Previous	Revised
Avg. price of stock consumed during the month	Rs./Ton	13,605	18,195	18,064
Avg. net calorific value of stock consumed during the month	kCal/Kg	5,990	5,830	5,679
Avg. net calorific value of stock consumed during the month	BTU/Kg	23,768	23,136	22,536
Net Heat Rates	BTU/kWh	8,584	8,584	8,584
Revised Fuel Cost Component for November 2020	Rs./kWh	4.9135	6.7507	6.8809

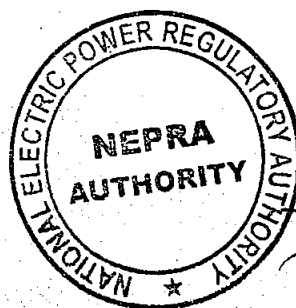
Note: The above adjustment of fuel cost component on coal shall be subject to verification by a consultant/Independent third party to be appointed for the purpose by the Authority. In case the verified delivered coal price is different, the fuel cost component shall be revised accordingly.



Huaneng Shandong Ruyi Energy (Private) Company Limited
Details of Shipments

For the month of November 2020

Shipment Number		HSR 226	HSR 227	HSR 228
Vessel Name		ASIA ZIRCON II	EVER ALLIANCE	OSIRIS
Bill of Lading (B/L) Date		23-Sep-20	30-Sep-20	7-Oct-20
L/C / TT Number		ICBC/LHE/RGC/2 0200930-02	ICBC/LHE/RGC/2 0201012-01	ICBC/LHE/RGC/2 0201016-01
Origin		South Africa	South Africa	South Africa
API-4 Index for the month of B/L Date		57.03	57.03	59.19
Base Calorific Value	kCal/Kg	6,000	6,000	6,000
Actual Calorific Value	kCal/Kg	5,768	5,661	5,762
Quantity	MT	37,000	40,392	38,258
FOB Coal Price API-4 Index as per B/L month Adjusted for CV	US\$/Ton	54.82	53.81	56.84
Discount	US\$/Ton	-	-	-
Marine Freight Charges	US\$/Ton	15.08	15.84	15.84
Marine Insurance	US\$/Ton	0.07	0.07	0.07
CIF Coal Price	US\$/Ton	69.97	69.71	72.76
Handling Loss 1% or actual whichever is minimum	US\$/Ton	-	-	-
CIF Coal Price with losses at Karachi	US\$/Ton	69.97	69.71	72.76
Other Charges:	US\$/Ton	13.49	13.28	13.71
(i) Port Handling Charges	US\$/Ton	4.23	4.23	4.23
(ii) Port Qasim Royalty Charge	US\$/Ton	2.40	2.40	2.40
(iii) Customs Duties & Cess	US\$/Ton	4.77	4.78	5.14
(iv) L/C / TT Charges	US\$/Ton	0.10	0.10	0.10
(v) PDA Charges at Load Port	US\$/Ton	0.51	0.52	0.56
(vi) PDA Charges at Discharge Port	US\$/Ton	1.14	0.91	0.93
(vii) Freight Forwarding/Custom Clearance	US\$/Ton	0.05	0.05	0.05
(viii) Wharfage Charges	US\$/Ton	0.20	0.20	0.21
(x) Commodity & Ash Fusion Temperature Inspection	US\$/Ton	0.09	0.09	0.09
Inland Freight Charges	US\$/Ton	24.52	24.52	24.97
Delivered Coal Price before adjustment of Handling Loss	US\$/Ton	107.97	107.51	111.44
Handling Loss 1% or actual whichever is minimum	US\$/Ton	1.08	1.08	1.11
Delivered Coal Price with losses at Power Plant	US\$/Ton	109.05	108.58	112.55
Exchange Rate	Rs./US\$	166.48	166.48	163.45
Delivered Coal Price with losses at Power Plant	Rs./Ton	18,155.10	18,076.72	18,396.39



Huaneng Shandong Ruyi Energy (Private) Company Limited
Marine Freight Calculation

For the month of November 2020

Description		HSR 226	HSR 227	HSR 228
		ASIA ZIRCON II	EVER ALLIANCE	OSIRIS
		PQA	PQA	PQA
Delivery Days:				
Voyage	Days	27.04	27.04	27.04
At Port	Days	6.64	6.64	6.64
Total Delivery Days	Days	33.68	33.68	33.68
Average Time Charter Rate	US\$/Day	10,226	10,910	10,914
Time Charter Cost	US\$	344,386	367,422	367,556
Bunker Consumption:				
Bunker during Voyage	Ton	878.72	878.72	878.72
Bunker during Port Days	Ton	33.20	33.20	33.20
MGO Consumption	Ton	3.90	3.90	3.90
Total	Ton	915.82	915.82	915.82
Bunker Price 0.5%	\$/Ton	320.00	330.00	330.00
MGO Price 0.1%	\$/Ton	415.00	425.00	438.00
Bunker Cost	US\$	293,433	302,591	302,641
Total Voyage Expense	US\$	637,819	670,012	670,198
Quantity	Tons	42,300	42,300	42,300
Marine Freight	US\$/Ton	15.08	15.84	15.84
*PDA Charges both at Load and Discharge Ports have been included in Other Charges.				

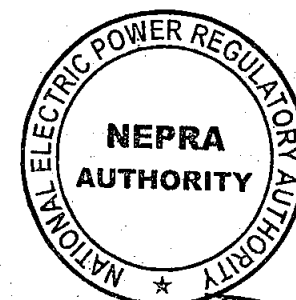


Huaneng Shandong Ruyi Energy (Private) Company Limited
Schedule of Fuel Cost Part of Energy Charge
Adjustment on Account of Coal Price Variation for the Month of December 2020

Description	Quantity	Net CV	Coal Price		Exchange Rate
	Ton	kCal/Kg.	US\$/Ton	Rs/Ton	Rs./US\$
Consumption from Stock:					
Consumption from Shipment No. HSR 224	2,909	5,820	109.63	18,252	166.48
Consumption from Shipment No. HSR 225	2,905	5,529	106.05	17,655	166.48
Consumption from Shipment No. HSR 226	2,920	5,768	109.05	18,155	166.48
Consumption from Shipment No. HSR 227	2,910	5,661	108.58	18,077	166.48
Consumption from Shipment No. HSR 228	10,647	5,762	112.55	18,396	163.45
Consumption from Shipment No. HSR 229	40,965	5,876	113.79	18,600	163.45
Consumption from Shipment No. HSR 230	39,104	5,798	112.61	18,406	163.45
Consumption from Shipment No. HSR 231	9,977	5,788	112.48	18,385	163.45
Total Consumption	112,337	5,811	112.58	18,435	163.76

Description	Unit	Reference	Previous	Revised
Avg. price of stock consumed during the month	Rs./Ton	13,605	18,024	18,435
Avg. net calorific value of stock consumed during the month	kCal/Kg	5,990	5,679	5,811
Avg. net calorific value of stock consumed during the month	BTU/Kg	23,768	22,536	23,061
Net Heat Rates	BTU/kWh	8,584	8,584	8,584
Revised Fuel Cost Component for December 2020	Rs./kWh	4.9135	6.8655	6.8621

Note: The above adjustment of fuel cost component on coal shall be subject to verification by a consultant/Independent third party to be appointed for the purpose by the Authority. In case the verified delivered coal price is different, the fuel cost component shall be revised accordingly.

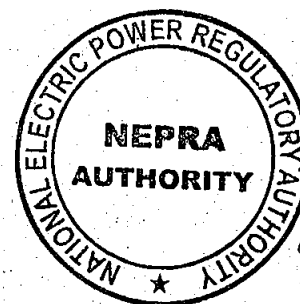


Huaneng Shandong Ruyi Energy (Private) Company Limited
Schedule of Fuel Cost Part of Energy Charge
Adjustment on Account of Coal Price Variation for the Month of February 2021

Description	Quantity	Net CV	Coal Price		Exchange Rate
	Ton	kCal/Kg.	US\$/Ton	Rs/Ton	Rs./US\$
Consumption from Stock:					
Consumption from Shipment No. HSR 237	1,374	5,708	143.76	23,110	160.76
Consumption from Shipment No. HSR 238	59,537	5,887	145.47	23,385	160.76
Consumption from Shipment No. HSR 239	43,410	5,849	146.16	23,497	160.76
Consumption from Shipment No. HSR 240	42,468	5,702	145.94	23,462	160.76
Consumption from Shipment No. HSR 241	43,542	5,788	148.44	23,863	160.76
Consumption from Shipment No. HSR 242	40,348	5,709	147.44	23,702	160.76
Consumption from Shipment No. HSR 243	39,887	5,744	147.57	23,732	160.82
Total Consumption	270,566	5,787	146.73	23,589	160.77

Description	Unit	Reference	Previous	Revised
Avg. price of stock consumed during the month	Rs./Ton	13,605	19,652	23,589
Avg. net calorific value of stock consumed during the month	kCal/Kg	5,990	5,712	5,787
Avg. net calorific value of stock consumed during the month	BTU/Kg	23,768	22,667	22,966
Net Heat Rates	BTU/kWh	8,584	8,584	8,584
Revised Fuel Cost Component	Rs./kWh	4.9135	7.4421	8.8169

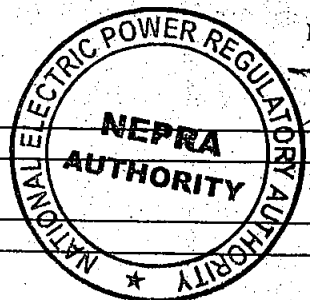
Note: The above adjustment of fuel cost component on coal shall be subject to verification by a consultant/Independent third party to be appointed for the purpose by the Authority. In case the verified delivered coal price is different, the fuel cost component shall be revised accordingly.



Huaneng Shandong Ruyi Energy (Private) Company Limited

Details of Shipments

For the month of February 2021



Shipment Number		HSR 238	HSR 239	HSR 240	HSR 241	HSR 242	HSR 243
Vessel Name		SBI GEMINI	AMAMI K	NEW HORIZON	AL WATHBA	VENTURE GOAL	XIN HAI TONG 8
Bill of Lading (B/L) Date		7-Dec-20	4-Dec-20	14-Dec-20	19-Dec-20	24-Dec-20	12-Jan-21
L/C / TT Number		ICBC/LHE/RGC/2 0201222-01	ICBC/LHE/RGC/2 0201223-02	ICBC/LHE/RGC/2 0201228-01	ICBC/LHE/RGC/ 20210104-01	ICBC/LHE/RGC/2 0210106-06	ICBC/LHE/RGC/2 0210122-01
Origin		South Africa	South Africa	South Africa	South Africa	South Africa	South Africa
API-4 Index for the month of B/L Date		90.35	90.35	90.35	90.35	90.35	90.43
Base Calorific Value	kCal/Kg	6,000	6,000	6,000	6,000	6,000	6,000
Actual Calorific Value	kCal/Kg	5,887	5,849	5,702	5,788	5,709	5,744
Quantity	MT	60,163	43,862	42,910	44,000	40,764	43,054
FOB Coal Price API-4 Index as per B/L month Adjusted for CV	US\$/Ton	88.65	88.08	85.86	87.16	85.97	86.57
Discount	US\$/Ton	-	-	-	-	-	-
Marine Freight Charges	US\$/Ton	11.81	16.62	17.21	17.34	17.77	17.98
Marine Insurance	US\$/Ton	0.08	0.08	0.09	0.10	0.10	0.09
CIF Coal Price	US\$/Ton	100.55	104.78	103.16	104.60	103.84	104.64
Handling Loss 1% or actual whichever is minimum	US\$/Ton	-	-	-	-	-	-
CIF Coal Price with losses at Karachi	US\$/Ton	100.55	104.78	103.16	104.60	103.84	104.64
Other Charges:	US\$/Ton	18.18	14.64	14.90	15.93	15.70	15.03
(i) Port Handling Charges	US\$/Ton	4.37	4.23	4.23	4.23	4.23	4.23
(ii) Port Qasim Royalty Charge	US\$/Ton	2.27	2.40	2.40	2.40	2.40	2.40
(iii) Customs Duties & Cess	US\$/Ton	6.00	6.05	6.36	7.26	7.27	6.65
(iv) L/C / TT Charges	US\$/Ton	0.10	0.10	0.10	0.10	0.10	0.10
(v) PDA Charges at Load Port	US\$/Ton	0.46	0.58	0.47	0.62	0.47	0.54
(vi) PDA Charges at Discharge Port	US\$/Ton	0.66	0.92	0.99	0.97	0.88	0.76
(vii) Transportation & Loading charges	US\$/Ton	3.96	-	-	-	-	-
(vii) Freight Forwarding/Custom Clearance	US\$/Ton	0.05	0.05	0.05	0.05	0.05	0.05
(viii) Wharfage Charges	US\$/Ton	0.21	0.21	0.21	0.21	0.21	0.21
(ix) Commodity & Ash Fusion Temperature Inspection	US\$/Ton	0.09	0.09	0.09	0.09	0.09	0.09
Inland Freight Charges	US\$/Ton	25.30	25.30	26.44	26.44	26.44	26.43
Delivered Coal Price before adjustment of Handling Loss	US\$/Ton	144.03	144.72	144.50	146.97	145.98	146.11
Handling Loss 1% or actual whichever is minimum	US\$/Ton	1.44	1.45	1.44	1.47	1.46	1.46
Delivered Coal Price with losses at Power Plant	US\$/Ton	145.47	146.16	145.94	148.44	147.44	147.57
Exchange Rate	Rs./US\$	160.76	160.76	160.76	160.76	160.76	160.82
Delivered Coal Price with losses at Power Plant	Rs./Ton	23,385.02	23,497.17	23,461.98	23,862.82	23,701.73	23,731.68