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இலங்கைப் பொதுப் பயன்பாடுகள் ஆணைக்குழு

PUBLIC UTILITIES COMMISSION OF SRI LANKA



ඔබේ අංකය உமது இல. Your No. **අපේ අංකය** ගෙනු இல. Our No.

PUC/E/Tariff/01

දිනය _{නිසනි} Date

Jan 24, 2024

Dr. N. De Silva General Manager Ceylon Electricity Board

Electricity tariff revision January - March 2024

Reference is made to your tariff proposal submitted on January 16, 2024 (Ref: DGM(CS&RA)/TRF/Trf.2024) on the above subject.

The Commission has declared open the stakeholder consultation on the tariff review. The consultation document is attached herewith (Annex -1). You may submit your comments/concerns on the same by January 26, 2024.

Further the Commission requires clarifications listed in the Annex -2 to review your submission. The clarifications listed in Annex -2 shall be submitted by January 30, 2024.

Damitha Kumarasinghe Director General

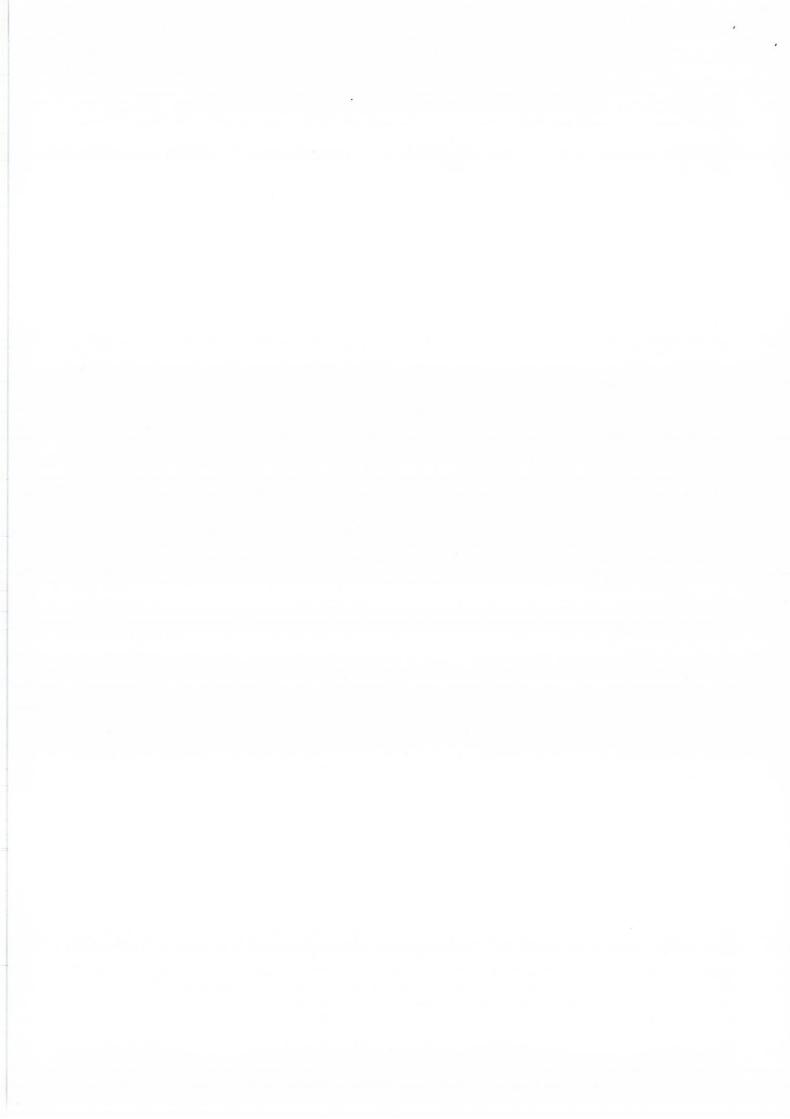
06.වන මහල, ලංකා බැංකු වෙළඳ කුළුණ, 28. ශාන්ත මයිකල් පාර, කොළඹ 03.

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06 ஆவது மாடி, இலங்கை வங்கி வர்த்தகக் கோபுரம், 28, சென் மைக்கல் வீதி, கொழும்பு 03. Level 06, BOC Merchant Tower, 28, St. Michael's Road, Colombo 03, Sri Lanka.

Web: www.pucsl.gov.lk

Director General



Stakeholder Consultation on Revision of Electricity Tariffs – 2024

Considering the favorable hydro storage and profits earned for the year ended on December 31, 2023, the Ceylon Electricity Board (CEB) was directed (Annex 2) to submit a tariff proposal.

Accordingly, the end user and bulk supply tariff proposals by CEB, for January to March 2024 were received by the Commission on January 16, 2024 (Annex 3)

Commission requested (Annex 4) certain clarifications from CEB and the information are yet to be received. The Commission wishes to consult the stakeholders as required under Section 30(3) of Sri Lanka Electricity Act (SLEA), on the proposed tariff structure and the associated costs. The process is launched as early as possible to ensure timely implementation of the tariff revision. Any further analysis by the Commission on further information submitted by CEB will be uploaded in Commissions website during the stakeholder consultation period.

Stakeholders are hereby requested to provide their comments on the following;

- 1. Proposed forecast costs by CEB for 2024
- 2. Proposed Tariff Structure (3.34% reduction) by CEB (Rate table attached Annex 1)

All comments shall be sent on or before February 12, 2024, in writing via email, fax or post. Oral consultation session is scheduled to be held on February 15, 2024 in Colombo.

ANNUAL COSTS OF CEB FOR 2024 (AS FILED BY CEB ON JAN 16, 2024)

CEB proposed costs for 2024 are shown in the table below

Table 1 – Annual Cost & Revenue 2024

Cost Components	Units	Amount for 2024
Generation -Energy Cost	MLKR	351,780.50
Generation -Capacity Cost	MLKR	135,183.00
Transmission Cost	MLKR	12,320.80
Finance Cost	MLKR	53,910.90
Distribution Cost	MLKR	133,235.20
Total Cost	MLKR	686,430.40
Estimated Revenue	MLKR	710,161.30
Surplus /(Deficit)	MLKR	23,730.90

GENERATION COSTS JAN -DEC 2024 (AS FILED BY CEB ON JAN 16, 2024)

Table 2 - Fuel Prices Jan – Jun 2024

Power Station & Fuel	I I mile	Fuel Prices							
Power Station & Fuel	Unit	Jan	Feb	Mar	Apr	May	Jun		
Kelanitissa Auto Diesel	LKR/Litre	358.00	358.00	358.00	358.00	358.00	358.00		
Kelanitissa Combined Cycle 2 Auto Diesel	LKR/Litre	358.00	358.00	358.00	358.00	358.00	358.00		
Sapugaskanda Auto Diesel	LKR/Litre	358.00	358.00	358.00	358.00	358.00	358.00		
Chunnakkam Auto Diesel	LKR/Litre	358.00	358.00	358.00	358.00	358.00	358.00		
Barge Auto Diesel	LKR/Litre	358.00	358.00	358.00	358.00	358.00	358.00		
Hambantota Auto Diesel	LKR/Litre	358.00	358.00	358.00	358.00	358.00	358.00		
Mathugama Auto Diesel	LKR/Litre	358.00	358.00	358.00	358.00	358.00	358.00		
Norachchole Coal Power Diesel	LKR/Litre	358.00	358.00	358.00	358.00	358.00	358.00		
Norachchole Coal Power Coal	LKR/kg	53.51	53.51	53.51	53.51	53.51	53.51		
New Chunnakkam Heavy Fuel	LKR/Litre	209.00	209.00	209.00	209.00	209.00	209.00		
Sapugaskanda Heavy Fuel	LKR/Litre	209.00	209.00	209.00	209.00	209.00	209.00		
Kelanitissa Combined Cycle Naphtha	LKR/Litre	163.00	163.00	163.00	163.00	163.00	163.00		
Barge Heavy Fuel	LKR/Litre	209.00	209.00	209.00	209.00	209.00	209.00		
Southern Emergency Power 01 Fuel oil	LKR/kg	223.41	223.41	N/A	N/A	N/A	N/A		
Southern Emergency Power 02 Fuel oil	LKR/kg	224.29	224.29	N/A	. N/A	N/A	N/A		
Southern Emergency Power 03Fuel oil	LKR/kg	N/A	N/A	224.29	224.29	224.29	224.29		
Southern Emergency Power 01 HFO	LKR/Litre	209.00	209.00	N/A	N/A	N/A	N/A		
Southern Emergency Power 02 HFO	LKR/Litre	209.00	209.00	N/A	N/A	N/A	N/A		
Southern Emergency Power 03 HFO	LKR/Litre	N/A	N/A	209.00	209.00	209.00	209.00		
West Coast Kerawalapitiya HFO	LKR/Litre	209.00	209.00	209.00	209.00	209.00	209.00		
Sobadhanavi Diesel	LKR/Litre	N/A	N/A	N/A	N/A	N/A	358.00		

Table 3 - Fuel Prices Jul – Dec 2024

Dower Station & Fuel	l l min	Fuel Prices							
Power Station & Fuel	Unit	Jul	Aug	Sep	Oct	Nov	Dec		
Kelanitissa Auto Diesel	LKR/Litre	358.00	358.00	358.00	358.00	358.00	358.00		
Kelanitissa Combined Cycle 2 Auto Diesel	LKR/Litre	358.00	358.00	358.00	358.00	358.00	358.00		
Sapugaskanda Auto Diesel	LKR/Litre	358.00	358.00	358.00	358.00	358.00	358.00		
Chunnakkam Auto Diesel	LKR/Litre	358.00	358.00	358.00	358.00	358.00	358.00		
Barge Auto Diesel	LKR/Litre	358.00	358.00	358.00	358.00	358.00	358.00		
Hambantota Auto Diesel	.LKR/Litre	358.00	358.00	358.00	358.00	358.00	358.00		
Mathugama Auto Diesel	LKR/Litre	358.00	358.00	·358.00	358.00	358.00	358.00		
Norachcholé Coal Power Diesel	LKR/Litre	358.00	358.00	358.00	358.00	358.00	358.00		
Norachchole Coal Power Coal	LKR/kg	53.51	53.51	53.51	53.51	53.51	53.51		
New Chunnakkam Heavy Fuel	LKR/Litre	209.00	209.00	209.00	209.00	209.00	209.00		
Sapugaskanda Heavy Fuel	LKR/Litre	209.00	209.00	209.00	209.00	209.00	209.00		
Kelanitissa Combined Cycle Naphtha	LKR/Litre	163.00	163.00	163.00	163.00	163.00	163.00		
Barge Heavy Fuel	L'KR/Litre	209.00	209.00	209.00	209.00	209.00	209.00		
Southern Emergency Power 03Fuel oil	LKR/kg	224.29	224.29	224.29	224.29	224.29	224.29		
Southern Emergency Power 03 HFO	LKR/Litre	209.00	209.00	209 00	209.00	209.00	209.00		
West Coast Kerawalapitiya HFO	LKR/Litre	209.00	209.00	209.00	209.00	209.00	209.00		
Sobadhanavi Diesel	.LKR/Litre	358.00	358.00	358.00	358.00	358.00	358.00		

The two Tables below shows the forecast generation energy costs for the period Jan-Dec 2024, based on the generation dispatch forecast submitted by CEB.

Table 4 - Generation Dispatch Forecast and Energy Costs Jan to Jun 2024

Power Station\Month	Unit .	Jan	Feb	Mar	Apr	May	Jun
Mahaweli/Laxapana/Samanala	GWh ⁻	478.27	351.27	359.45	343.84	473.72	365.11
ivianawen/Laxapana/Samanaia	LKR/kWh		-	-	1-	-	2
Mannar wind	GWh	17.69	18.26	10.59	5.00	37.37	51.20
iviannar wind	LKR/kWh	-	-	-	2		-
Canugaskanda 1	GWh	2.76	20.80	28.48	27.04	16.44	22.58
Sapugaskanda 1	LKR/kWh	111.87	57.75	55.52	55.84	59.95	57.10
Conugaskanda 3	GWh	38.17	34.47	38.17	36.94	27.85	36.94
Sapugaskanda 2	LKR/kWh	49.49	49.93	49.49	49.63	51.02	49.63
Volgnitissa CT16	GWh	2	1 12	-	-	-	-
Kelanitissa GT16	LKR/kWh	-	-	-	-	-	=
Kelanitissa GT07	GWh	-	-			-	-
Kelanitissa G107	LKR/kWh	-	-	-	-	-	-
Volonities Combined Code 1	GWh	67.54	67.54	67.54	67.54	52.75	67.54
Kelanitissa Combined Cycle 1	LKR/kWh	45.94	46.46	45.94	46.14	46.66	46.14
Kolonitiana Combined Code 3	GWh		-	-	-	3.07	2.66
Kelanitissa Combined Cycle 2	LKR/kWh	-	1 4 1 1 8	-	-	119.90	133.70
Name also la de Caral	GWh	466.57	473.56	524.30	507.38	493.51	338.26
Norachchole Coal	LKR/kWh	23.79	23.85	23.59	23.73	23.69	24.48
New Chunnakkam	GWh	11.14	10.69	11.84	9.69	5.63	9.03
	LKR/kWh	50.20	50.32	50.02	50.65	53.17	50.91
Island Gen Chunnakkam	GWh	0.20	0.20	0.20	0.20	0.20	0.20
	LKR/kWh	115.87	115.87	115.87	115.87	115.87	115.87
DARCE	GWh	36.16	32.66	36.1.6	34.72	21.50	33.05
BARGE	LKR/kWh	50.30	50.73	50.30	50.47	53.03	50.68
201014/11	GWh	-		-		0.16	
30MW Hambaritota	LKR/kWh	-	-			118.90	
205 614/ 5 4 - 1	GWh	-	-	_	-	0.07	-
20MW Mathugama	LKR/kWh	-	-	_	_	134.26	-
W to the second	GWh	11.75	39.74	96.78	73.90	-	113.25
West Coast Kerawalapitiya	LKR/kWh	69.24	57.79	54.96	55.57		55.07
Court on Francisco De 1400 MM	GWh	4 42	-	7.26	1.30	9.17	17.43
Southern Emergency Power (100MW)	LKR/kWh	-	-	57.44	71.70	56.79	55.62
ACE Embiliation	GWh	0.43	1.17	-	2		-
ACE Embilipitiya	LKR/kWh	1.41.91	86.36	-	_	-	-
ACE Matauri	GWh	0.33	0.60		-	-	-
ACE Matara	LKR/kWh	80.92	68.89	12	-	-	
Calcadha and	GWh	-	-	-	-	-	
Sobadhanavi	LKR/kWh		-	-	-	-	-
	GWh	88.31	79.49	124.13	98.30	168.03	226.88
Renewable	LKR/kWh	22.01	22.55	21.43	21.73	20.83	20.43
	GWh	73.45	73.52	80.24	70.72	68.76	65.05
Solar Rooftop Generation	LKR/kWh	24.92	24.92	24.92	24.92	24.92	24.92
*	GWh	1,292.77	1,203.98	1,385.14	1,276.56	1,378.23	1,349.16
Total	MLKR	23,479	25,639	31,771	28,863	24,152	30,498

Table 5 - Generation Dispatch Forecast and Energy Costs Jul to Dec 2024

Power Station\Month	Unit	Jul	Aug	Sep	Oct	Nov	Dec
NA-h	GWh	462.36	317.94	349.81	332.94	325.13	353.70
Mahaweli/Laxapana/Samanala	LKR/kWh	-	-		y=0		
NA	GWh	45.60	44.40	42.21	18.61	12.46	18.19
Mannar wind	LKR/kWh						-
Convendende 1	GWh	23.02	22.29	13.18	30.36	29.38	23.43
Sapugaskanda 1	LKR/kWh	56.95	57.19	62.54	55.14	55.33	56.82
Convendendo 3	GWh	34.99	38.17	28.86	38.17	36.94	35.78
Sapugaskanda 2	LKR/kWh	49.87	49.49	50.82	49.49	49.63	49.77
Kelanitissa GT16	GWh				-	- 1 xxx - 1	-
Kelaliitissa G116	LKR/kWh	-	-		- 1		-
Valanitiana CT07	GWh	-	-	-	1 -	-	
Kelanitissa GT07	LKR/kWh	-		-	-	<u>-</u>	-
Kalamitiana Camabina d Cuala 1	GWh	64.47	67.54	54.91	69.45	70.72	61.70
Kelanitissa Combined Cycle 1	LKR/kWh	46.00	46.46	46.19	47.14	47.90	46.26
Kalanitiana Cambinad Carla 2	GWh	8.43			3.38	32.44	30.35
Kelanitissa Combined Cycle 2	LKR/kWh	93.21	-		122.15	82.92	83.85
	GWh	349.53	524.30	451.57	349.53	338.26	349.53
Norachchole Coal	LKR/kWh	24.40	23.67	23.85	24.52	24.48	24.40
	GWh	7.67	10.05	6.49	10.45	11.46	9.56
New Chunnakkam	LKR/kWh	51.57	50.53	52.37	50.40	50.11	50.70
11 16 6	GWh	0.20	0.20	0.20	0.20	0.20	0.20
Island Gen Chunnakkam	LKR/kWh	115.87	115.87	115.87	115.87	115.87	115.87
DARCE	GWh	31.12	36.16	25.40	34.15	33.05	34.15
BARGE	LKR/kWh	50.95	50.30	52.00	50.54	50.68	50.54
2010/11/11	GWh	0.74	_			-	2.35
30MW Hambantota	LKR/kWh	103.84		-			100.97
200000000	GWh	0.34	-	-	=	-	-
20MW Mathugama	LKR/kWh	107.18	-	-		-	
Mast Coast Karawalanitiva	GWh	97.23	38.71	46.41	152.10	123.36	121.90
West Coast Kerawalapitiya	LKR/kWh	54.95	57.92	57.10	54.24	54.48	54.96
S	GWh	16.03	-	-	31.34	42.35	35.75
Southern Emergency Power (100MW)	LKR/kWh		-		55.05	54.86	54.96
C-b-dbd	GWh	5.47	-			-	
Sobadhanavi	LKR/kWh		-	-	-	-	
Danawahla	GWh	181.06	232.12	240.62	221.42	181.51	193.14
Renewable	LKR/kWh	20.78	20.30	20.12	20.01	19.97	19.99
Calan Daniffer Constitution	GWh	73.48	73.37	77.17	73.77	65.26	67.61
Solar Rooftop Generation	LKR/kWh	24.92	24.92	24.92	24.92	24.92	24.92
	GWh	1,401.73	1,405.24	1,336.84	1,365.86	1,302.50	1,337.35
Total	MLKR	28,390	29,846	26,696	34,340	34,385	33,722

Table 6 - Generation Capacity Costs Jan to Jun 2024

Power Station\Month	Unit	Jan	Feb	Mar	Apr	May	Jun
Mahaweli	MLKR	1,191.57	1,191.57	1,191.57	1,191.57	1,191.57	1,191.57
Laxapana	MLKR	1,103.22	1,103.22	1,103.22	1,103.22	1,103.22	1,103.22
Samanala	MLKR	788.46	788.46	788.46	788.46	788.46	788.46
Mannar Wind	MLKR	544.62	544.62	544.62	544.62	544.62	544.62
Sapugaskanda 1	MLKR	330.39	330.39	330.39	330.39	330.39	330.39
Sapugaskanda 2	MLKR	339.83	339.83	339.83	339.83	339.83	339.83
Kelanitissa GT16	MLKR	263.33	263.33	263.33	263.33	263.33	263.33
Kelanitissa GT07	MLKR	442.01	442.01	442.01	442.01	442.01	442.01
Kelanitissa Combined Cycle 1	MLKR	366.49	366.49	366.49	366.49	366.49	366.49
Kelanitissa Combined Cycle 2	MLKR	183.07	183.07	183.07	183.07	142.55	142.55
Norachchole Coal	MLKR	4,171.89	4,171.89	4,171.89	4,171.89	4,171.89	4,171.89
New Chunnakkam	MLKR	139.00	139.00	139.00	139.00	139.00	139.00
Island Gen Chunnakkam	MLKR	11.58	11.58	11.58	11.58	11.58	11.58
BARGE	MLKR	200.88	200.88	200.88	200.88	200.88	200.88
30MW Hambantota	MLKR	54.79	54.79	54.79	54.79	51.64	54.79
20MW Mathugama	MLKR	36.53	36.53	36.53	36.53	34.43	36.53
West Coast Kerawalapitiya	MLKR	1,204.82	1,127.09	1,204.82	1,165.96	1,171.35	1,133.57
Southern Emergency Power	MLKR	-	-	136.57	121.67	141.34	161.98
ACE Embilipitiya	MLKR	111.22	113.07	-		-	-
ACE Matara	MLKR	33.73	34.44	-	-	· · · · · · · · · · · · · · · · · · ·	-
Sobadhanavi	MLKR	h-:	-	-	-	-	448.10
Renewable	MLKR	-	-	-	-	-	-
Total	MLKR	11,517.41	11,442.25	11,509.03	11,455.27	11,434.57	11,870.77

Table 7 - Generation Capacity Costs Jul to Dec 2024

Power Station\Month	Unit	Jul	Aug	Sep	Oct	Nov :	Dec
Mahaweli	MLKR	1,191.57	1,191.57	1,191.57	1,191.57	1,191.57	1,191.57
Laxapana	MLKR	1,103.22	1,103.22	1,103.22	1,103.22	1,103.22	1,103.22
Samanala	MLKR	788.46	788.46	788.46	788.46	788.46	788.46
Mannar Wind	MLKR	544.62	544.62	544.62	544.62	544.62	544.62
Sapugaskanda 1	MLKR	330.39	330.39	330.39	330.39	330.39	330.39
Sapugaskanda 2	. MLKR	339.83	339.83	339.83	339.83	339.83	339.83
Kelanitissa GT16	MLKR	263.33	263.33	263.33	263.33	263.33	263.33
Kelanitissa GT07	MLKR	442.01	442.01	442.01	442.01	442.01	442.01
Kelanitissa Combined Cycle 1	MLKR	366.49	366.49	366.49	366.49	366.49	366.49
Kelanitissa Combined Cycle 2	MLKR	142.55	183.07	183.07	142.55	142.55	142.55
Norachchole Coal	MLKR	4,171.89	4,171.89	4,171.89	4,171.89	4,171.89	4,171.89
New Chunnakkam	MLKR	139.00	139.00	139.00	139.00	139.00	139.00
Island Gen Chunnakkam	MLKR	11.58	11.58	11.58	11.58	11.58	11.58
BARGE	MLKR	200.88	200.88	200.88	200.88	200.88	200.88
30MW Hambantota	MLKR	51.64	54.79	54.79	54.79	54.79	51.64
20MW Mathugama	MLKR	34.43	36.53	36.53	36.53	36.53	36.53
West Coast Kerawalapitiya	MLKR	1,204.82	1,127.09	1,204.82	1,165.96	1,171.35	1,133.57
Southern Emergency Power	MLKR		-	118.42	196.77	224.30	207.79
ACE Embilipitiya	MLKR	110.14	110.14	-	-	-	-
ACE Matara	MLKR	32.85	32.85	-	-	-	=
Sobadhanavi	MLKR	-	-		-		448.10
Renewable	MLKR	-	-	-	-	(4)	2
Total	MLKR	11,469.69	11,437.73	11,490.88	11,489.84	11,522.77	11,913.43

Transmission, distribution and finance Costs of CEB for 2024 (as filed by CEB on Jan 16, 2024)

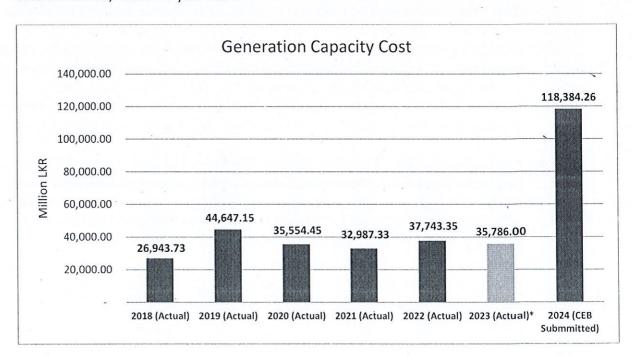
Table 8 – Annual Transmission, Distribution and Finance Cost 2024

Cost Components	Units	Amount for 2024
Transmission Cost	MLKR	12,320.80
Finance Cost	MLKR	53,910.90
Distribution Cost	MLKR	133,235.20

COMMISSION VIEWS ON CEB TARIFF FILING

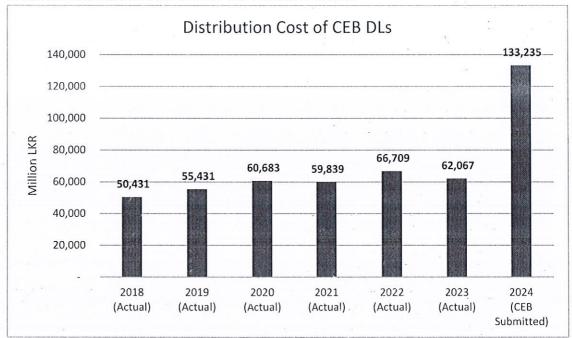
Commission has noticed following items in CEB proposal for further review;

- 1. 100 MW of emergency power is included in the dispatch forecast without any approval of the Commission and in a situation where existing 100 MW emergency power plants procured have only generated on average 6.29 GWh/month. However, a capacity charge of 206 MLKR/month have been paid on average.
 - Despite the extremely low utilization of emergency power plants procured in 2023, CEB has proposed to purchase emergency power in 2024 as well, having an additional capacity charge of MLKR 1,594.84 for the year 2024.
- CEB has proposed to dispatch power plants without generation license in 2024. In June 2023
 costs of non-licensed power plants were allowed in the tariff with the condition that CEB shall
 obtain generation licenses within two months from June 30, 2023. However, CEB has not
 obtained generation license for these power plants. The forecast capacity cost of these plants
 is MLKR 5,160.65 for year 2024
- 3. Depreciation of CEB generation plants is added to the capacity cost. Since these plants have been built with the government fundings, it is not appropriate for CEB to collect depreciation for the same. However, 20% of total depreciation charge can be allowed as Return on Equity. Thus, the additional forecast capacity charge from this is MLKR 14,816.92 for year 2024.
- 4. Generation capacity cost is overstated for 2024. Actual generation capacity cost for past years is compared below with the capacity costs submitted for 2024. The forecast additional capacity cost is MLKR 95,728.72 for year 2024.



*Note: Generation capacity costs for years except for year 2023 above includes only the capacity costs of CEB plants. The 2023 cost includes the capacity costs of IPP plants, West Coast, ACE-Embilipitiya and ACE-Matara, in addition to the CEB plant costs. For 2024 IPP capacity cost of, West Coast, ACE-Embilipitiya ACE-Matara, Southern Emergency Power 100MW and Sobadhanavi needs to be added to the cost shown above to get the total capacity cost.

5. Distribution cost of MLKR 133,235.20 is overstated for 2024. Historical actual distribution costs of CEB are shown below.



Actual distribution costs of LECO have been requested. Once the information is submitted, it will be uploaded with this document. Overall, the forecast CEB distribution cost is about MLKR 64,915.60 overstated for year 2024

- 6. A finance cost of MLKR 53,910.90 for 2024 is submitted by CEB. In a situation where the policy rates have been reduced, a finance cost of MLKR 53,910.90 shall be further looked into.
- 7. CEB has submitted an income statement for year ended on December 31, 2023 (Values for month of December are estimated) (Annex 5). As per the submitted income statement, profits earned during 2023 is MLKR 48,722. However, the profits earned during 2023 has not been considered for tariff reduction proposal of CEB. Also, the profit estimated for December 2023 is understated at MLKR 16,987, compared to MLKR 32,187 reported for November 2023.
- 8. CEB has not considered the time taken to implement the tariff revision in arriving at the percentage reduction of 3.34% and has distributed the surplus throughout all 12 months even though CEB has requested to implement the tariff from February 1, 2024. However, it is estimated that the new reduced tariff will be implemented from Mid-February, 2024. Therefore, it is proposed to distribute the total surplus over 10.5 months.

This document with all annexures can be downloaded from the Commission's website (https://www.pucsl.gov.lk/wp-content/uploads/2024/01/Tariff-Revision-2024-Full-Consultation-Document-1.pdf)

Annex - 2: List of clarifications

- 1. What is basis of inclusion of 100 MW emergency power in the generation cost calculation.
- 2. CEB generation capacity costs submitted via Bulk Supply Tariff Filing for 2024 has been increased by a considerable margin as shown in the graph of page 7 of the Consultation document (Annex 1). Provide the basis for increase of Generation capacity cost (Including allocations from common divisions) with detail numerical calculations (in the form of incremental budgeting, giving reasons for marginal increase of each cost item)
- 3. CEB distribution cost submitted via your tariff proposal (MLKR 133,235.20) for 2024 has been increased by a considerable margin as shown in the graph of page 8 of the Consultation document (Annex 1). Provide the basis for increase of Distribution cost (Including allocations from common divisions) with detail numerical calculations (in the form of incremental budgeting, giving reasons for marginal increase of each cost item)

