



THE SINGARENI COLLIERIES COMPANY LIMITED
(A Government Company)
2 X 600 MW SINGARENI THERMAL POWER PROJECT
Jaipur (V&M)-504216, Mancherial (Dist), T.S.

Ref no: STPP/COML/2022-23/257

Dt:18.01.2023

To,
The Secretary,
T.S. Electricity Regulatory Commission,
5th Floor, Singareni Bhavan, Red Hills,
Lakdi ka pool, Hyderabad – 500 008.

Sir,

Sub: SCCL – Rejoinder to the reply submitted by **TSDISCOM's** regarding O.P.No 77 of 2022 in respect of Singareni Thermal Power Project, Phase-I (2X600 MW) – Reg.

Ref: ED(Commercial),TSPCC email dated 12.01.2023 regarding reply of TSDISCOM's in O.P.No 77 of 2022 relating to 2x600MW STPP of SCCL.

The rejoinder to the reply submitted by the beneficiary related to 2X600MW STPP vide reference email relating to midterm review petition O.P.No 77 of 2022 is hereby submitted with six copies each.

The Hon'ble commission is kindly requested to accept the same.

Thanking you.

Yours sincerely


Chief Technical Consultant

STPP, SCCL
SANJAY KUMAR SUR
CHIEF TECHNICAL CONSULTANT
SINGARENI THERMAL POWER PLANT
PEGADAPALLY (V), JAIPUR (M),
DIST: MANCHERIAL-504 216 T.S.

Encl: Rejoinder to the email dated 12.01.2023 with 6 copies

**BEFORE THE TELANGANA STATE ELECTRICITY
REGULATORY COMMISSION
AT HYDERABAD**

CASE NO. O.P. No. 77 OF 2022

IN THE MATTER OF:

Filing of Mid-term review petition for truing up of generation tariff for 2X600 MW Singareni Thermal Power Plant for 2019-2022 and for approval of revised tariff from 1st April 2022 to 31st March 2024 in accordance with sections 62, 86.1(a) & 86.1(b) of Electricity Act 2003 read with regulation 3.8.2, 3.12, 27 and other applicable regulations of Telangana State Electricity Regulatory Commission (Terms and Conditions of Generation Tariff) regulations 2019.

AND IN THE MATTER OF:


The Singareni Collieries Company Limited (SCCL): Kothagudem Collieries, Bhadradri Kothagudem Dist, Telangana State - 507101;

PETITIONER

AND

1. Southern Power Distribution Company of Telangana Limited (TSSPDCL): Corporate Office: # 6-1-50, Mint Compound, Hyderabad, Telangana-500 063.
2. Northern Power Distribution Company of Telangana Limited (TSNPDCL): H.No: 2-5-31/2, corporate Office, Vidyut Bhavan, Nakkalagutta, Hanamkonda, Warangal, Telangana- 506001.

RESPONDENTS


SANJAY KUMAR SUR
CHIEF TECHNICAL CONSULTANT
SINGARENI THERMAL POWER PLANT
PEGADAPALLY (V), JAIPUR (M),
DIST: MANCHERIAL-504 216 T.S.

**BEFORE THE TELANGANA STATE ELECTRICITY REGULATORY COMMISSION
HYDERBAD
O.P.No. 77 of 2022**

Between:

The Singareni Collieries Company Limited (SCCL): Kothagudem Collieries,
Bhadradri Kothagudem Dist, Telangana State - 507101;

PETITIONER

AND

1. Southern Power Distribution Company of Telangana Limited (TSSPDCL):
Corporate Office: # 6-1-50, Mint Compound, Hyderabad, Telangana-500
063.
2. Northern Power Distribution Company of Telangana Limited (TSNPDCL):
H.No: 2-5-31/2, corporate Office, Vidyut Bhavan, Nakkalagutta,
Hanamkonda, Warangal, Telangana- 506001

RESPONDENTS

AFFIDAVIT

I, Shri Sanjay Kumar Sur, son of Santi Charan Sur aged 69 years residing at ED
Bungalow, STPP Township, Pegadapally, Jaipur, Mancherial, Telangana-504216
do solemnly affirm and say that

1. I am the Chief Technical Consultant of STPP, SCCL, the petitioner in
the above matter and am duly authorized by the said petitioner to
make this affidavit.
2. I have read and understood the contents of the accompanying
affidavit drafted pursuant to my instructions. The statements made in
accompanying affidavit now shown to me are true to my knowledge
and are derived from official records made available to me and are
based on information and advice received which I believe to be true
and correct.

I Solemnly affirm at Mancherial on ^{19/1/23} day of January, 2023 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.

(Shri Sanjay Kumar Sur)


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ATTESTED
Pegadapally
NOTARY
PERAM RAJAJAH
ADVOCATE
Mamatha Super Tower Complex
The District Court of Mancherial



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REJOINDER TO THE REPLY FILED ON BEHALF OF RESPONDENTS NUMBER 1 AND 2, SOUTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED (TSSPDCL) & NORTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED (TSNPDCL)

THE PETITIONER RESPECTFULLY SUBMITS PARA WISE RESPONSE BELOW:

1. **Para 1 to 5** of the reply is a matter of record and required no response.
2. The contents of **para 6 & 7** are disputed, to the extent the same is contrary to the statement of petitioner. The reason for non-allowance of spill over works from the Commission's own observation in the MYT order dated 28.8.2020 is reproduced below:
"5.4.17.....However, SCCL has not considered the additional capitalisation pertaining to this spill over items in its tariff computations for the Control Period from FY 2019-20 to FY 2023-24"
The year wise details of spill over expenditures for FY 2019-22 is now available and submitted herewith in mid-term review petition for considering the same in capital cost, this should not be considered as additional capital cost and should be treated as integral part of capital cost.
3. The contents of **para 8** is a reproduction of regulation 3.12.2 and do not require any response.
4. The contents of **para 9** is denied, where at the respondent alleged that petitioner is re-seeking additional capitalization which was already disallowed. In fact it is to submit that all the revised capitalization claims in this mid-term review petition are well within the limit of revised cost estimates and sought as per regulations /observation and liberty which are provided by the Hon'ble Commission in its orders. The petitioner is not seeking any item/component which is already disallowed by the Hon'ble commission.



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5. The reply to para 10-11 on Revision of capital cost due to discharge of liabilities (BTG & BOP) are given below:

- a) The respondents stated that SCCL **reclaimed** the undischarged liabilities towards BTG (Rs.33.96 crore) and BOP (Rs.85.26 crore) based on audited annual accounts furnished by it.
- b) They further noted clause 7.19.1.(j) of TSERC regulations 1 of 2019 provides liability for **works admitted by the Commission** to be allowed to the extent of discharge of such liability by actual payments.
- c) Respondents cited APTEL judgment dated 10th August 2010 in Appeal No.37 of 2010 where the Hon'ble APTEL has held that the audited accounts do not deal with the prudence of expenditure but verify whether expenditure has been actually incurred or not. Therefore, **State Commission is bound to apply prudence check** to finally determine whether the expenditure towards certain components is to be allowed or not.
- d) As such, it is to state that the **Hon'ble Commission has already allowed the capital cost for BTG & BOP** upto 31.03.2019 as Rs.4849.48 crore & Rs.1007.27 crore respectively but deducted the undischarged liability of Rs.33.96 crore and Rs.85.26 crore as tariff is allowed by TSERC on the cash expenditure incurred by STPP.
- e) The following table provides the summary of allowance in respect of BTG & BOP vide Hon'ble Commissions order dated 28.08.2020.

Particulars	Capital cost (A) Upto 31.03.2019	Undischarged liability in capital cost (B)	Allowed capital cost by TSERC (C=A-B) Upto 31.03.2019	References of tariff order dtd.28.08.2020
BTG	4849.48	33.96	4815.52	Page no.46, Table-13
BOP	1007.27	85.26	922.01	Page no.48, Table-14

Sanjay
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f) Accordingly, it is confirmed that the **works in respect of claimed components were already been approved by the Commission** and the claim is not blindly based on the figures of audited annual accounts. Further, as there is **no disagreement in respect of application of prudence check** on actual audited expenditures by Hon'ble TSERC for allowance in revised capitalization the cited judgement of APTEL has no help to the respondents.


g) **Therefore, the discharged liability within the limit of capital cost for BTG & BOP already approved by the Hon'ble Commission is required to be considered under revised capitalization as per clause 7.19.1.(j) and the relevant points answered in this rejoinder.**

6. The reply to para 12 on Revision of capital cost due to spill over works beyond 31.03.2019 is given below:

a) The respondent stated that the claim of SCCL for spill over works are not tenable because of the aforesaid APTEL judgment which provides that **prudence check is the criteria but not audited figures**. They further stated that consideration of additional capitalization would amount to re-determination of Multi-year tariff for FY 2019-24.

b) In reply to said contention, it is to state that there is **no disagreement in respect of application of prudence check over actual audited expenditures** for allowance in revised capitalization. The details of revised capitalization for spill over items have already been submitted with the reasoning. In this respect the **statement of revised capitalization provided in page no.510-515** of the submission may be referred.

c) It has completely been misconceived by the respondents that **consideration of revised capitalization in mid-term review petition in terms of appropriate regulation /Commission's own observation /remark in the original order** would amounts to re-determination of Multi Year tariff order. The respondents claim in this aspect is firmly refuted.


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d) The reason for non-allowance of spill over works from the Commission's own observation in the MYT order dated 28.8.2020 is reproduced below:

a. ***"5.4.17.....However, SCCL has not considered the additional capitalisation pertaining to this spill over items in its tariff computations for the Control Period from FY 2019-20 to FY 2023-24"***

e) **The year wise details of spill over expenditures for FY 2019-22 is now available and submitted in mid-term review petition for considering the same in revision of capital cost.**

f) Accordingly, the spillover expenditures are required to be considered for determination of capital cost/tariff during MYT period.

7. The reply to para 13 on Emergency work in respect of railway siding works is given below:

a) The respondent's objection is that the **SCCL has adequate funds** for executing railway siding works, **SCCL has not justified emergency nature of work** and that the **work execution was taken up after cut-off date (31.03.2019)**.

b) In reply to contention of the respondent, it is to submit that the audited statement of capital cost and liability for FY 2019-22 is submitted in Page no.299-305 of MYT petition. As per this, the railway siding expenditure as on 31.03.2022 was Rs.346.33 crore whereas the Hon'ble Commission has allowed only Rs.80 crores towards this said works and CCDAC has released Rs.121 crore for this. Therefore, it can be seen from the above that **SCCL is entitled for Rs.145 crores (Rs.346 cr – Rs.80 cr – Rs.121 cr) towards the said work**. Accordingly, it is evident that the petitioner SCCL is short of fund for executing the railway siding works. **This fact is contrary to objectors observation that SCCL has adequate fund.**

c) It is to state that the emergency nature of work for OHE and signaling & telecommunication **works have already been justified with documentary evidence in**


the mid-term review petition submitted before the Hon'ble Commission. The relevant portion is reproduced below:

“At present, railway locos are running with diesel engines which are going to be obsolete in near future and therefore railway electrification is the need of the hour. The conversion of diesel system to electrical system is likely to result in reduction of coal transport charges. SCCL has started the work of over head electrification of STPP siding by taking Board approval and entering into Memorandum of Understanding (MoU) with South Central Railway for the work. An amount of RS.23.82 crores was paid to South Central Railway for the aforesaid work which will be executed as deposit work. The relevant documents are attached in Annexure-G.

As per as the railway signaling system is concerned, currently it is being managed manually. STPP is also using railway lines for evacuation of ash from SILO. The cement companies such as ACC, Ultra-tech, Calburgi are sending their own BCCW (Bulk carrier of cement wagon) rakes. As a result STPPs railway siding is used for both the coal and ash rakes. This contributes to increase in loco traffic which could only be safely managed with signaling and telecommunication system replacing the present manual signaling system. Accordingly, signaling and telecommunication work is also required to be taken up in this tariff period of 2019-24.

The work for railway electrification and signaling & telecommunication system are now mandatory requirements which are to be completed at the earliest as per the directives of the railway authorities to ensure standard safety and operating procedures. Further, the union cabinet has also accorded sanction for railway electrification for balance un-electrified routes of Indian Railway. Letter by Union cabinet in this matter is attached as Annexure-H.”

- d) The regulation 7.8 of TSERC regulation 01 of 2019 specifically provided for capital expenditure required for emergency work which has earlier not been considered in the capital investment plan. As such, careful reading of this clause establishes that the **claim of emergency work is no way related to cut-off date.**


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e) Further, the tariff component on overhead electrification (OHE) and signaling & telecommunication (S&T) works shall be claimed whenever this works will be completed. Accordingly, it is prayed before this Hon'ble Commission to allow these expenditures as per clause 7.8 of TS 01 of 2019.

8. The reply to para 14 (i) on Computation of return on equity is given below:

- a) The main issue is the **consideration of effective tax rate** for grossing up with base RoE of 15.5%. **There is no disagreement** on effective tax rate **for the FY 2019-20** for which both the parties proposed MAT rates to be applied. However, for FY 2020-22 respondents submitted that generating companies are liable to pay concessional tax rates of MAT under section 115JB for 10 consecutive years and for 11th year onwards when normal tax will be paid earlier tax credit if any can be utilized. **Respondents argued that even for 2020-21 and 2021-22 MAT rates only are required to be considered.**
- b) In reply to contention of the respondents, SCCL submits that **there occurred change of system/method in the corporate taxation vide Ministry of Finance circular No 29/2019 dated 02.10.2019** where revised tax rate of 25.168% was offered without allowing any exemption under section 80IA, MAT credit utilization etc as an alternative to present taxation system.
- c) It is to further submit that SCCL was primarily engaged in coal mining business and diversified to power business. As such, major part of its revenue is generated by coal business and SCCL pays income tax as a whole at company level by consolidating the financial results of both coal and power business. **The management of SCCL opted taxation @ 25.168% in terms of aforesaid notification migrating from existing taxation system.** Accordingly, being a part of SCCL, STPP was also subjected to tax rate @25.168% which was appropriately claimed as effective tax rate in respect of FY 2020-22.
- d) The respondents also claimed and cited one order passed by CERC in respect of one of the NTPC projects where MAT rates have been considered. In this regard it is to submit

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that the said order is not an order for truing up and this order only provides provisional income tax rates which will be subsequently required to be trued up at the end of control period. Therefore, this citation is not applicable in the context of current mid-term review petition of multi-year tariff 2019-24 allowed by TSERC.


- e) Accordingly, the Hon'ble commission is requested to consider the effective income tax rates as claimed in the mid-term review petition for arriving at grossed up rates of RoE.

9. The reply to para 14 (ii) on Computation of interest on loan is given below:

- a) The respondents claimed that TSERC in the order date 28.08.2020 had disallowed first loan refinancing which occurred during FY 2016-19. In this regard, it is stated that the tariff claim in this midterm review petition do not include any claim due to first loan restructuring.
- b) In fact the respondent has definitely ignored the fact that the **second loan restructuring was a separate activity** from the first loan restructuring which happened during FY 2016-19.
- c) It is pertinent to state that the said second loan restructuring happened on 15.10.2020, i.e., after the pronouncement of TSERC order dated 28.08.2020 and as such, this restructuring needs to be allowed as per regulation 12.6 of TSERC regulation 01 of 2019 in mid-term review.

10. The reply to para 14 (iii) on Claim for depreciation is given below:

- a) The respondents submitted that the depreciation sums already approved by Hon'ble Commission vide its order dated 28.08.2020 should continue without any change.
- b) It is to submit that the depreciation is required to be recomputed in accordance with regulation 10 of TSERC generation tariff regulation 2019-24 after finalizing the approved revised capitalization in midterm review petition.


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11. The reply to para 14 (iv) on Interest on working capital is given below:

- a) The respondents have canvassed to disallow the additional 20% price on the basic cost of coal considered in the working capital.
- b) STPP submits that it is supplied with bridge linkage coal with the price applicable for any bridge linkage customers. As such, SCCL has not made any price discrimination between the bridge linkage customers as the Naini coal mine is still not ready to deliver coal. STPP is constrained to get the coal through bridge linkage. In fact it is only as per the directives of Ministry of coal, STPP is being supplied coal through bridge linkage.
- c) In view of the above, the objection on the bridge linkage pricing has no merit.
- d) Accordingly, the Hon'ble Commission is prayed to consider the coal price paid by STPP for computation of interest on working capital.

12. The reply to para 14 (v) Operating & Maintenance (O&M) expenses: Scope of review petition vs. Mid-term review is given below:


The respondents have submitted that SCCL's submission on **analogy between review of an order and midterm review is not correct**. Respondents have tried to justify their stand by stating that review can be undertaken only by a court as per the guidelines of civil procedure code (CPC) and not by TSERC. In this regard, it is to submit that TSERC was established in accordance with the provisions of Electricity Act, 2003. The Section 94 of Electricity Act, 2003 provides that the appropriate commission such as, TSERC would have the same powers as vested in civil court under the code of civil procedure, 1908 for review of its decisions, directions & orders. Accordingly, it is stated that TSERC has power to review its decisions during midterm review which has wider scope compared to an application of mere truing up of operational and financial performances especially if there is discovery of new and important matters which could not be produced when the order was made. That apart the Hon'ble TSERC has permitted

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specifically to mid-term review of the MYT tariff of 2019-24. Therefore, the contention of the respondents is misplaced.

13. The reply to para 14 (v)(I) on Expenditure for safety and security is given below.

- a) The respondents noted that SCCL submitted uncontrollable expenditure of Rs.35.3 crore for deployment of higher numbers of CISF (Central Industrial Security Force) which was required as Ministry of Home Affairs categorized Mancherial District (where STPP project is located) as one of the most effected LWE (left wing extremism) district.
- b) The main objections of the respondents against these claims are,
- I. O&M expenses are considered as controllable factor in TS regulation 01 of 2019.
 - II. MHA circular dated 9th August did not include Mancherial district where the STPP project is located.
 - III. SCCL failed to claim additional expenditure for CISF based on the letters issued by MHA during February 2019 and August 2019 in the main multi-year tariff petition submitted on 30.03.2019.
 - IV. SCCL should approach Telangana State Government for funding assistance out of special central assistance in terms of press notification dated 5th February, 2019 issued by MHA, since normative O&M expenses were already approved by this Hon'ble Commission.
- c) In reply to the objections, it is to submit that the TSERC regulation considers O&M expenditure as controllable item and the **same regulation additionally provides regulation 3.12.5 by which petitioner may apply to the commission for inclusion of any variable as uncontrollable factor** with justifiable reason.
- d) The above regulations are completely in line with APTEL judgment in Appeal No.256. The relevant portion of which is reproduced below:
- a. **"8. Our Findings: -**
 - b. **8.1..... Further, there is merit in the argument of the Appellant that O&M expenses were approved based on the past trend as per the provisions of the Statutory Regulations and therefore, there is all the more reason to**


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exercise the discretionary power vested with the Commission to deal with the exceptional expenses incurred by the Utility by analyzing the reason”.

- e) Further, the respondent objected about non-presence of name of the Mancherial district in MHA circular dated 9th August 2019. It is to state that the CISF's posted in the STPP are included in the CISF unit of "SCCL Singareni". The circular categorizes CISF units operating in most effected left extremist areas. Therefore, there is no separate mention of CISF unit at STPP, Mancherial in the above mentioned circular.
- f) The respondent expected STPP to include the **effect of letter written on August, 2019 in Midterm review petition submitted on March 2019. Such an act is impossible to do.**
- g) The respondents stated that the SCCL should approach Telangana State Government for funding assistance as Government of India has approved special assistance scheme for LWE affected areas to fund critical gaps in public infrastructure and services of urgent nature. It is quite clear that **SCCL, being a State Government company doing mining & electricity business cannot qualify under public infrastructure of urgent nature** which are namely, bridges, district and village roads providing connectivity, mobile tower projects, post offices, ATMs and branches of banks as per the details given in the cited circular.
- h) It is also stated that the total CISF expenditure for FY 2019-22 is around Rs.78.67 crore out of which only an estimated Rs.43.38 crore have been considered in the MYT order dated 28.08.2020.
- i) Accordingly, the additional cost of Rs.35.3 crore is claimed as uncontrollable expenditure as per regulation 3.12.5 of TS 01 of 2019.

14. The reply to para 14 (v)(II) on Expenditures towards annual coal mill overhauling which were not there during the base period, is given below.

- a) The respondents state that this claim is not in consonance with the provision of TSERC regulation 01 of 2019 as this expenditure is a component of repairs & maintenance


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which falls under O&M which have already been considered by the TSERC while issuing MYT order dated 28.08.2020.

- b) In respect of said contentions of the respondents it is already stated that **this claim for annual coal mill overhauling have been made under regulation 3.12.5** which allows petitioner to claim uncontrollable expenditures citing sufficient reasons.
- c) It is to submit that the detailed data/values of **expenditures were not existing in 2016-17 to 2018-19 on which inflationary projections were applied to arrive at normative value of O&M expenditure** vide TSERC order dated 28.08.2020. Accordingly, the normative O&M allowed by the commission during FY 2019-24 inadvertently missed expenditures incurred towards these items. Therefore, the petitioner is entitled to claim these expenditures in this mid-term review.

15. The reply to para 14 (v)(III) on Additional consumption of capital spares since not addressed during MYT tariff is given below.

- a) The respondents have noted the submission of STPP in respect of capital spares and the justifications and regulations cited by it. The objection on this matter was that the O&M expenditure comes under controllable factor and the expenditure for capital spares have been factored in O&M expenditure. And therefore, the inclusion of capital spares as uncontrollable is not sustainable. Further, the objector stated that the **actual O&M expenditures were not submitted by STPP.**
- b) In reply to the said contentions, it is to submit that audited O&M cost segregated in R&M cost, employee cost, administrating & general expenditure **have been submitted in page no.369 in the midterm review petition.** A copy of the same is also submitted now as **Appendix-A.**
- c) The detailed reasoning for seeking inclusion of capital spares as uncontrollable factors has been submitted in the petition page no.17-20. The main reasons for claiming these are **constrained capitalization of initial spare under regulatory burden and non-**


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capturing of capital spare expenditure in base year while determining the O&M expenditure by TSERC.

16. The reply to para 14 (vi & vii) on Energy charges and Incentives is given below:

- a) **In this regard, it is to submit that STPP is facing difficulty in settlement of deviations of actual generation compared to scheduled generation especially in view of manual recording of joint meter reading taken over a span of couple of hours and delay in implementation of deviation settlement regulation notified by Hon'ble commission.**
- b) **It is to state that as per deviation settlement mechanism provided by CERC, settlement for hundreds of connected entities is being done since long. Accordingly, in a similar manner, it is prayed before this Hon'ble Commission to pass an implementation order of the deviation settlement regulation in Telangana, or to notify interim settlement code till the final rolling out of deviation settlement mechanism through separate proceedings.**
- c) **Till the implementation of deviation settlement regulation or any interim settlement code which may be notified by the Hon'ble TSERC, STPP/SCCL is constrained to compute energy charges and incentive based on actual generation in accordance with Section 61.(b) of Electricity Act, 2003 which provides generation, transmission, distribution & supply of electricity are to be conducted on commercial principles.**


17. The reply to para 14 (viii) on Additional auxiliary consumption for FGD system is given below:

- a) **In view of the objections submitted by the respondents and in the presence of CERC amendment regulation dated 25.08.2020 the matter was reviewed in detail.**
- b) **It is found that the maximum auxiliary energy consumption for FGD guaranteed by the contractor while finalizing the technical specification was 6.2 MW per unit. This translates to auxiliary power consumption at the rate 1.033% which is also aligned to the normative aux value specified by the Hon'ble CERC.**


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18. The reply to para 15 is given below:

- a. STPP, based on the comments of the respondents on auxiliary energy consumption of FGD reviewed the same. STPP has now **modified its claim for auxiliary energy of FGD as 1.033% based on the contractual agreements of FGD.**
- b. In other issues **the claim of respondents has no basis in making its objections, and that the petitioner is entitled for the same.**
- c. The Hon'ble commission is requested to consider all the submissions made now in this rejoinder along with the original submission of mid-term review petition to finalize the truing up for FY 2019-22 and allow revised provisional tariff for 2022-24.


**Chief Technical Consultant
STPP, SCCL**

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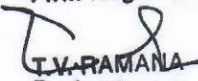
**Appendix-A: Audited O&M cost segregated in
R&M cost, employee cost, administrating &
general expenditure**

OPERATION AND MAINTENANCE EXPENSES (O&M)

(Rs. Crore)

Sl.No	Particulars	2019-20	2020-21	2021-22
I	Administrative & General Expense	48.63	58.57	66.07
a	Purchased Power	9.37	5.79	3.16
b	Insurance	11.67	13.80	13.32
c	CISF	14.36	29.01	35.30
d	Others	13.23	9.97	14.30
II	Repairs & Maintenance Expense	101.90	116.07	126.95
a	Stores & Spares	38.19	36.02	42.33
b	Repairs & Maintenance	13.09	16.91	15.87
c	Overhauling cost	-	9.80	19.66
d	Hiring of HEMM, Weigh Bridges & others	5.38	4.17	4.21
e	STPP-O&M	45.24	49.17	44.89
III	Employee cost	77.12	75.30	88.73
a	Salary including manpower cost of O&M contract	71.45	71.09	82.94
b	Special incentive	0.94	0.26	1.26
c	CMPF with Administration Charges	3.26	3.20	3.23
d	Leave Encashment	1.47	0.76	1.30
IV	Grand Total	227.65	249.95	281.76

For **BRAHMAYYA & CO.,**
Chartered Accountants
Firm Registration No: 000513S


T.V. RAMANA
Partner
Membership No: 200523

