

Telangana State Electricity Regulatory Commission 5th Floor, Singareni Bhavan, Red Hills, Lakdi-ka-Pul, Hyderabad 500004

ORDER

ON

BUSINESS PLAN, & CAPITAL INVESTMENT PLAN FOR FY 2024-25 TO FY 2028-29

FOR

SINGARENI THERMAL POWER PROJECT (2x600 MW)

OF

THE SINGARENI COLLIERIES COMPANY LIMITED

29.12.2023

CONTENTS

Part	Description	Page No.
Chapter 1	Introduction	2
Chapter 2	Summary of Filings	5
Chapter 3	Issues raised by General Public, Responses of	7
	Petitioner, Commission's views	
Chapter 4	Analysis and Conclusion on Business Plan for FY	16
	2019-20 to FY 2023-24	
Annexure 1	Public Notice	28
Annexure 2	List of stakeholders who submitted the written	30
E	comments/ objections/ suggestions	
Annexure 3	List of stakeholders who participated in public hearing	31
E S	held on 31.10.2023	2.3



LIST OF TABLES

Table 1: Norms of operation proposed by SCCL for the Period from FY 2024-25 to FY 2028-29	5
Table 2: Generation forecast submitted by SCCL	5
Table 3: Capital Investment Plan and capitalisation plan submitted by SCCL	6
Table 4: Capital Investment Plan and capitalisation plan submitted by SCCL	20
Table 5: Emission norms applicable for Singareni TPP	20



LIST OF ABBREVIATIONS

CEA	Central Electricity Authority
CERC	Central Electricity Regulatory Commission
CIL	Coal India Limited
CIP	Capital Investment Plan
COD	Commercial Operation Date
EA 2003	Electricity Act, 2003
FGD	Flue Gas Desulphurisation
FSA	Fuel Supply Agreement
FY	Financial Year
GoTS	Government of Telangana State
GSHR	Gross Station Heat Rate
IDCT	Induced Draft Cooling Tower
KTPP	Kakatiya Thermal Power Plant
MoC	Ministry of Coal
MoEF&CC	Ministry of Environment, Forest & Climate Change
MoP	Ministry of Power
MW	Mega Watt
MYT	Multi Year Tariff
NAPAF	Normative Annual Plant Availability Factor
NAPLF	Normative Annual Plant Load Factor
NOx	Nitrogen oxides
NTPC	National Thermal Power Corporation Limited
O&M	Operations and Maintenance
O.P.	Original Petition
OEM	Original Equipment Manufacturer
PAF	Plant Availability Factor
PLF	Plant Load Factor
PPA	Power Purchase Agreement
Rs.	Rupees
S&T	Signalling and Telecommunication
SCCL	Singareni Collieries Company Ltd.
SOx	Sulphur Oxides
TSERC	Telangana State Electricity Regulatory Commission
TSGENCO	Telangana State Power Generation Corporation Ltd.
TSNPDCL	Northern Power Distribution Company of Telangana Ltd.
TSSPDCL	Southern Power Distribution Company of Telangana Ltd.

TELANGANA STATE ELECTRICITY REGULATORY COMMISSION HYDERABAD

O.P.Nos.25 and 26 of 2023

Present Sri T.Sriranga Rao, Chairman Sri M.D.Manohar Raju, Member (Technical) Sri Bandaru Krishnaiah, Member (Finance)

Dated: 29.12.2023

Between: The Singareni Collieries Company Limited

... Petitioner

And

- 1. Southern Power Distribution Company of Telangana Limited
- 2. Northern Power Distribution Company of Telangana Limited

... Respondents

The Singareni Collieries Company Limited (SCCL) filed the Petitions u/s 62 of the Electricity Act, 2003 and under the provisions of the Telangana State Electricity Regulatory Commission (Terms and Conditions of Generation Tariff) Regulations, 2019 (Regulation No. 1 of 2019) for approval of Business Plan and Capital Investment Plan for the period from FY 2024-25 to FY 2028-29 for its 2x600 MW Thermal Power Project (TPP).

The Commission, in exercise of its powers under the Electricity Act, 2003, Regulation No.1 of 2019, and after considering Petitioner's submissions, suggestions and objections of the other stakeholders, responses of Petitioner, issues that are raised during the Public Hearing and all other relevant material, passed the following Order.

1

COMMON ORDER CHAPTER 1 INTRODUCTION

1.1 BACKGROUND

- 1.1.1 Telangana State Electricity Regulatory Commission (herein referred to as TSERC or the Commission) was constituted by the Government of Telangana State (GoTS) in terms of the provisions of Schedule XII (C) (3) of the A. P. Reorganisation Act of 2014, read with Section 82 of the Electricity Act, 2003 (Act) vide G.O.Ms.No.3, Energy (Budget) Department, dated 26.07.2014.
- 1.1.2 SCCL is a coal mining company incorporated under the Companies Act, 1956 and owned by GoTS and Government of India (GoI) with 51% and 49% shareholding respectively. SCCL has established a 2x600 MW coal based TPP (hereinafter referred to as "the project") at Jaipur in Mancherial District. SCCL entered into a Power Purchase Agreement (PPA) dated 18.01.2016 with the Southern Power Distribution Company of Telangana Ltd. (TSSPDCL) and Northern Power Distribution Company of Telangana Ltd. (TSNPDCL) (hereinafter referred to as "DISCOMs") for sale of power from the project for a period of 25 years from the Commercial Operation Date (COD) of last Unit (Unit 2) at the tariff determined by the Commission under Section 62 of the Electricity Act, 2003. Units 1&2 achieved COD on 25.09.2016 and 02.12.2016 respectively.
- 1.1.3 Regulation No.1 of 2019 stipulate the terms and conditions of generation tariff for the Control Period from FY 2019-20 to FY 2023-24. The Petitions for approval of Business Plan and Capital Investment Plan for the Period from FY 2024-25 to FY 2028-29 were filed on 21.08.2023.
- 1.1.4 SCCL, in its Petitions, submitted as under:

"It is humbly submitted that the applicability of the TS 01 of 2019 was not extended beyond the current control period of 2019-24. However, it was observed that the biggest state generating entity of Telangana state ie TSGENCO has filed petition for Capital Investment Plan (CIP) and Business Plan (BP) for 2024-29 and the petitions were accepted by the Hon'ble commission and also put for public hearing on 20.07.2023.

Accordingly, now it is construed that the applicability of current regulation, i.e., TS 01 of 2019 is being extended for future period of 2024-29 and therefore BP with respect to 2x600 MW STPP is prepared based on the said

presumption and STPP reserves its right to submit amended petition if this presumption is found as incorrect in the coming period.

Further, if the applicable tariff regulation or any other related regulations as to control period gets amended by the Hon'ble Commission, STPP craves leave to submit a revised petition on that ground."

1.2 ADMISSION OF PETITIONS AND REGULATORY PROCESS

- 1.2.1 The Petitions for approval of Business Plan and Capital Investment Plan for FY 2023-24 to FY 2028-29 were scrutinised and found to be generally in order as required under the TSERC (Conduct of Business) Regulations, 2015 (Regulation No.2 of 2015). The Commission admitted the filings and the same were taken on record by assigning the following Original Petition (O. P.) numbers:
 - O.P.No.26 of 2023 Business Plan for FY 2024-25 to FY 2028-29
 - O.P.No.25 of 2023 Capital Investment Plan for FY 2024-25 to FY 2028-29
- 1.2.2 The Petitioner, as directed by the Commission, published for information of all stakeholders a notice in two (2) English newspapers, two (2) Telugu newspapers and one (1) Urdu newspaper on 23.09.2023.
- 1.2.3 Overview of Stakeholders' Consultation Process:
- 1.2.3.1 The filings have been made available by the Petitioner along with supporting material to the public at large including all stakeholders. The filings and supporting material were also hosted on the websites of the Commission as well as the Petitioner.
- 1.2.3.2 It was also notified in the public notice (Annexure-1) that, objections/ suggestions on the filings may be filed before the Commission by 16.10.2023. In response to the public notice, objections/ suggestions/ comments were received from three (3) stakeholders (Annexure-2) by the Commission in writing, no further objections/suggestions were received during the Public Hearing. The list of persons who attended the Public Hearing on 31.10.2023 is enclosed at Annexure-3.
- 1.2.3.3 The Petitioner was directed to give the reply to the stakeholders in writing by 21.10.2023 by sending the same to the respective stakeholder with a copy to the Commission. The replies were also posted on the website of the

Commission.

1.2.3.4 The Commission has conducted the Public Hearing on 31.10.2023 in the attendance of the Petitioner, the Respondents and the other interested stakeholders. During the Public Hearing, the Petitioner made a brief submission on its filings and then the Commission heard the Respondents and other stakeholders desiring to be heard. At the end, the Petitioner responded on the issues raised by the objectors and on directions of the Commission, filed a written submission regarding the same.

1.3 DATAGAPS AND PETITIONER'S RESPONSES

1.3.1 During scrutiny, the filings of the Petitioner was found to be deficient in certain aspects and therefore, additional information was sought. The Commission has considered the original filings and additional information submitted by the Petitioner.



CHAPTER 2 SUMMARY OF FILINGS

2.1 BUSINESS PLAN FOR FY 2024-25 TO FY 2028-29

- 2.1.1 SCCL submitted the Business Plan constituting the following:
 - i. Generation Planning and forecasts;
 - ii. Capital Investment Plan;
 - iii. Future performance targets;
 - iv. Compliance status of environmental norms;
 - v. Saving in operating costs;
 - vi. Financial statements.
- 2.1.2 The norms of operation proposed for the Period from FY 2024-25 to FY 2028-

29 are as under:

Table 1: Norms of operation proposed by SCCL for the Period from FY 2024-25 to FY 2028-29

Parameter	Unit	Proposed
Target Availability for recovery of full Fixed Charges	%	85%
Target PLF for incentive	%	85%
Auxiliary Consumption	%	6.25% Additional 1% for FGD from August 2024 onwards
Gross Station Heat Rate	kcal/kWh	2303.88
Secondary Fuel Oil Consumption	ml/kWh	0.50
Transit Loss	%	0.80%

2.1.3 The generation forecast for the Control Period from FY 2024-25 to FY 2028-29 is as under:

Table 2: Generation forecast submitted by SCCL

Financial Year	PLF	Gross Generation	Auxiliary Consumption	Net Generation
	%	MU	%	MU
2024-25	88.72%	9331.20	6.47%	8727.47
2025-26	91.40%	9607.68	6.75%	8959.16
2026-27	91.40%	9607.68	6.75%	8959.16
2027-28	91.41%	9635.33	6.75%	8984.94
2028-29	91.40%	9607.68	6.75%	8959.16

- 2.1.4 SCCL submitted the month wise generation forecast for each year of the Period from FY 2024-25 to FY 2028-29.
- 2.1.5 The summary of Capital Investment Plan and capitalisation plan proposed for the Control Period from FY 2024-25 to FY 2028-29 is as under:

						(1.3. (<i>JUIE</i>)
	Conital	Capitalisation					
Particulars	Capital Investment	FY 2024-25	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	Total
FGD system	736.00	696.00	40.00	-	-	-	736.00
In-furnace modifications for NOx compliance	40.00	-	20.00	20.00	-	-	40.00
O&M modules	68.00	32.00	36.00	-	-	-	68.00
Railway works	240.00	160.00	80.00	-	-	-	240.00
Township civil works	6.00	1.00	1.50	1.50	1.00	1.00	6.00
Implementation of flexible operation scheme as per CEA Regulation	20.77	20.77			-	-	20.77
Total	1110.77	774.77	177.50	156.50	1.00	1.00	1110.77

 Table 3: Capital Investment Plan and capitalisation plan submitted by SCCL

 (Rs. Crore)



CHAPTER 3 ISSUES RAISED BY STAKEHOLDERS, RESPONSES OF PETITIONER AND COMMISSION'S VIEWS

3.1 OBJECTIONS/SUGGESTIONS/COMMENTS MADE ON FILINGS

3.1.1 Three (3) stakeholders have filed objections/ suggestions/ comments on the Petitions for approval of Business Plan and Capital Investment Plan for FY 2024-25 to FY 2028-29. The Petitioner has filed replies on the objections/ suggestions/ comments received from the stakeholders. For the sake of clarity, the objections/suggestions/ comments raised by the stakeholders and responses of the Petitioner have been consolidated and summarised issuewise. The Commission has concluded all the objections/ suggestions/ comments of the stakeholders made in writing and the responses to them by the Petitioner.

3.2 NEED FOR BUSINESS PLAN

Stakeholders' submissions

3.2.1 The Commission determines the capital cost and tariff for a generating station in accordance with the applicable Regulations. The Commission approves the long-term load forecast and power procurement plan for the licensees. The Commission determines the tariffs for the licensees after due public consultation. Further, the applicability of the Regulation No. 1 of 2019 has not been extended beyond the Control Period from FY 2019-20 to FY 2023-24. The Business Plan for a generating station is essentially not required to be approved by the Commission and hence, the same may be dispensed with for the ensuing period.

Petitioner's replies

3.2.2 Regulation No. 1 of 2019 is applicable for the Control Period from FY 2019-20 to FY 2023-24. In accordance with Clause 7 of the Regulation No. 1 of 2019, SCCL has filed the Business Plan for the ensuing Control Period from FY 2024-25 to FY 2028-29.

Commission's View

3.2.3 The Commission has taken the note of the submissions made by the Stakeholder and response of the Petitioner. The Petitioner has filed the Business Plan for approval of the Commission and the Commission is issuing this Order on Business Plan filed by the Petitioner. The Commission is in the process of framing the Tariff Regulation for the ensuing Period from FY 2024-25 onwards and the requirement of Business Plan shall be as per the provisions of the final Reguation to be issued by the Commission.

3.3 CAPITAL INVESTMENT PLAN

Stakeholders' submissions

- 3.3.1 SCCL has not submitted the cost-benefit analysis of the proposed capital investment as per Clause 7.3 of the Regulation No. 1 of 2019.
- 3.3.2 SCCL submitted that the Commission, in the MYT Order dated 28.08.2020, had accorded approval for FGD system and In-furnace modifications for NOx compliance. SCCL also submitted that works of FGD system were awarded to PES Engineering Limited on 28.12.2021 and are expected to be completed by August, 2024. The works should have been undertaken through transparent competitive bidding process. The prudence check of capital expenditure shall have to be based on the mode of execution of the said works and not on the basis of prior approval by the Commission.
- 3.3.3 SCCL has proposed the capital expenditure of Rs. 736 Crore towards FGD as against the capital expenditure of Rs. 645.32 Crore proposed in the MYT for the Control Period from FY 2019-20 to FY 2023-24 thereby, the capital expenditure towards FGD has increased by Rs. 100 Crore. The proposed capital expenditure of Rs. 736 Crore towards FGD works out to Rs. 0.61 Crore per MW. NTPC has placed orders for four power plants with aggregate capacity of 4460 MW for supply and installation of FGD system to GE Power at a cost of Rs.1783 Crore which is equivalent to Rs.0.40 Crore per MW. Sembcorp Energy has also initiated bidding for setting up of FGD system worth Rs.1000 Crore for its power plants with a total capacity of 2640 MW which is equivalent to Rs.0.38 Crore per MW. in view of the same, the FGD cost may be limited to Rs.450 Crore for SCCL.
- 3.3.4 SCCL has proposed the capital expenditure of Rs. 68 Crore towards O&M modules citing the reasons of maintaining high power availability and recovery of fixed costs. The warranty of the machinery and availability of spares should

have been covered in the agreements with the equipment suppliers. SCCL has not made any submission in this regard. SCCL submitted that the procurement of O&M modules will improve the plant availability for the entire life of the plant. When the procurement of O&M modules would increase the plant availability for the entire life of the plant, procurement of O&M modules on the presumption that operating ones would fail after a span of seven (7) years since COD appears to be self-contradictory.

- 3.3.5 One stakeholder submitted that the Commission had allowed certain capital expenditure towards initial spares in the approval of capital cost and hence, the spares may be allowed subject to the ceiling limit of 4% of the plant and machinery cost in accordance with the Regulations.
- 3.3.6 SCCL has proposed the capital expenditure of Rs. 240 Crore towards railway works. The capital expenditure towards the said works had been disallowed by the Commission in the MYT Order dated 28.08.2020 as well as in the MTR Order dated 23.03.2023. Therefore, the proposed capital expenditure may not be allowed.
- 3.3.7 SCCL has proposed the capital expenditure of Rs. 6 Crore towards civil works for township. The said civil works are unrelated to power generation. SCCL has projected significant Profit After Tax (PAT) for the ensuing years and hence, the said expenditures may be met from its PAT.
- 3.3.8 SCCL submitted that the construction of 1x800 MW under Phase-II is under active consideration. As per the resource plans submitted by the DISCOMs, there would be significant surplus energy available during the 5th Control Period from FY 2024-25 to FY 2028-29. In such circumstances it is not advisable to add generation capacity by SCCL.
- 3.3.9 SCCL sought liberty to submit the capital investment plan in respect of its upcoming 1x800 MW generating unit as an addendum to the present Petition. The PPA for the upcoming 1x800 MW generating unit is yet to be signed by the DISCOMs. As Clause 7.4 of the Regulation No. 1 of 2019 provides for the capital investment plan in respect of existing generating stations, the request of SCCL for the capital investment plan for the upcoming generating unit may be disallowed.

Petitioner's replies

- 3.3.10 The proposed Capital Investment Plan is primarily based on capital expenditure towards compliance of new pollution norms for which FGD works are in progress. The Commission had accorded in principle approval for FGD and in-furnace modification for NOx mitigation works vide the MYT Order dated 28.08.2020.
- 3.3.11 The FGD works have been awarded to M/s PES Engineering Pvt. Ltd. on 28.12.2020 through competitive bidding process, in which three (3) nos. bidders have participated, at the awarded price of Rs. 590.25 Crore, which excludes Interest During Construction (IDC) and taxes & duties. The work has commenced on 28.12.2021. The proposed capital investment of Rs. 736 Crore includes the provisional amounts of IDC and taxes & duties. The actual executed cost shall be subject to prudence check by the Commission.
- 3.3.12 SCCL proposes to take up the in-furnace modification for NOx mitigation works during the Control Period from FY 2024-25 to FY 2028-29.
- 3.3.13 The proposed capital investment for procurement of O&M modules is to keep necessary capital spares available during the ensuing Control Period for successful execution of generation plan. The generating station has four (4) nos. Low Pressure (LP) rotors and two (2) nos. exciter assembly installed and are the major constituents of turbine generator assembly used for generation of electricity which are prone to failure. As the warranty period provided by the Original Equipment Manufacturer (OEM) viz., BHEL for the initial modules installed is completed, one (1) no. LP rotor and one (1) no. exciter assembly are required as spares and will be procured from the OEM. The Commission, in its Order on approval of capital cost vide its Order dated 19.06.2017, had approved the initial spares considering the ceiling limit of 2.5% of the approved capital cost. Clause 7.17 of the Regulation No. 1 of 2019 specifies the ceiling limit of initial spares as 4% of the plant and machinery cost. The total amount of initial spares including the O&M modules claimed would be well within the ceiling limit specified in the Regulation No. 1 of 2019. The Commission may approve the claim towards the O&M modules as the total initial spares are well within the ceiling limit specified in the Regulation No. 1 of 2019.

- 3.3.14 The proposed capital investment for railway works is towards overhead electrification system along with necessary signalling and telecommunication works, as advised by the Railway authorities, in order to ensure safe running of railway wagons and for reduction of transportation cost of coal.
- 3.3.15 The works which are required for safety and effective operations such as construction of closed shed for storage of materials, cement concrete roads for ash transportation and drainage system works would be taken up in other civil works.
- 3.3.16 As per the approved PPA, the DISCOMs cannot backdown below 65% of the capacity. However, as per the Central Electricity Authority (CEA) has notified the (Flexible Operation of Coal based Thermal Power Generating Units) Regulations, 2023 notified on 30.01.2023, the technical minimum for the 600 MW unit would be 40% i.e., 240 MW. Further, the minimum ramp rate capability should be 3% per minute i.e., 18 MW/min between 100% and 70% (i.e., between 600 MW and 420 MW), 2% per minute i.e., 12 MW/min between 70% and 55% (i.e., between 420 MW and 330 MW), 1% per minute i.e., 6 MW/min between 55% and 40% (i.e., between 330 MW and 240 MW). These Regulations have to be complied within one (1) year from the date of notification. Therefore, the capital investment of Rs. 20.77 Crore is required for modifications in control and instrumentation like flow operation package for axial fans.
- 3.3.17 The meeting on the draft PPA for the upcoming 1x800 generating unit was held with the DISCOMs in the month of August, 2023. During the public hearing, SCCL submitted that it is not pressing for the request regarding the submission of capital investment plan for its upcoming generating unit as it is premature at present.

Commission's View

3.3.18 The Commission has approved the Capital Investment Plan for the Period from FY 2024-25 to FY 2028-29 as detailed in Chapter 4.

3.4 NORMS OF OPERATION

Stakeholders' submissions

- 3.4.1 The Target Availability may be approved as 85% in line with the MYT Order dated 28.08.2020 and in accordance with the Regulations.
- 3.4.2 The PLF projections submitted by SCCL are higher than the Target PLF. It has been projected that huge surplus power would be available during the ensuing Control Period. The Commission may consider the generation at Target PLF and procurement of generation beyond the Target PLF may be left to the choice of the DISCOMs for meeting periodical requirements based on Merit Order Despatch.
- 3.4.3 SCCL has requested the Commission to approve the auxiliary consumption of 6.25% whereas the actual auxiliary consumption is in the range of 5.83%-6.12%. The variations in actual auxiliary consumption confirm the inconsistent performance, which is unexplained, and no improvement in efficiency. SCCL has requested the Commission to approve the additional auxiliary consumption of 1% towards FGD. However, from the claim of total auxiliary consumption of 6.75%, it appears that SCCL has considered the auxiliary consumption of 0.5% towards FGD. The Commission may approve the normative auxiliary consumption towards FGD based on operational experience in other stations. Further, the auxiliary consumption norms may be specified such that the lower of actual and normative values shall be applicable.
- 3.4.4 One stakeholder submitted that the auxiliary consumption may be approved as 5.75% in line with the MYT Order dated 28.08.2020.

Petitioner's replies

- 3.4.5 The projected PLF of 91% for the ensuing Control Period is based on past performance and taking into consideration overhauling and forced outages. However, the day ahead schedule would be given as per the State Grid Code and the beneficiaries may procure the required generation quantum under the merit order despatch.
- 3.4.6 The actual auxiliary consumption for FY 2019-20, FY 2020-21, FY 2021-22 and FY 2022-23 was 6.01%, 6.12%, 5.83% and 6.05% respectively. There are three (3) nos. 600 MW Units in operation in Telangana State out of which two (2) Units are of STPP and one Unit is of Kakatiya Thermal Power Plant

(KTPP) Stage II. The approved auxiliary consumption for KTPP Stage II is 7% with natural draft cooling towers whereas the approved auxiliary consumption for STPP is 5.75% with induced draft cooling towers. Taking into consideration the actual auxiliary consumption, the normative auxiliary consumption for the ensuing Control Period may be approved as 6.25% in accordance with the norms specified by CERC for 600 MW Units. The FGD system is expected to be commissioned in August, 2024. The FGD system is designed with additional auxiliary consumption of 1% and therefore, the total auxiliary consumption of 7.25% may be approved after commissioning of FGD system.

Commission's View

3.4.7 The Commission has approved the norms of operation for the Period from FY 2024-25 to FY 2028-29 as detailed in Chapter 4.

3.5 FINANCIAL STATEMENTS

Stakeholders' submissions

- 3.5.1 As per the provisional Profit and Loss Statement submitted by SCCL, the annual depreciation during the period from FY 2024-25 to FY 2028-29 is higher than the annual depreciation approved by the Commission in the MYT Order dated 28.08.2020 and MTR Order dated 23.03.2023. The depreciation claims of SCCL may be scrutinised by the Commission.
- 3.5.2 As per the provisional Profit and Loss Statement submitted by SCCL, the annual profit during the period from FY 2024-25 to FY 2028-29 is higher than the annual Return on Equity (RoE) approved by the Commission for the Control Period from FY 2019-20 to FY 2023-24. The RoE claims of SCCL may be scrutinised by the Commission.
- 3.5.3 SCCL may confirm if the other income shown in the Profit and Loss Statement includes the income from leasing out the marketing complex proposed to be taken up in the Township.

Petitioner's replies

3.5.4 The depreciation and RoE approved by the Commission correspond to the approved capital cost which do not include the proposed capital investment

for the ensuing Control Period. The provisional financial statements have been submitted as part of Business Plan. The detailed tariff claim would be submitted to the Commission in the MYT Petition for the ensuing Control Period.

3.5.5 SCCL submitted that the other income shown in the provisional Profit and Loss Statement includes the income from leasing.

Commission's View

3.5.6 The Commission has taken note of the stakeholders' submissions and SCCL replies thereof.

3.6 OTHERS

Stakeholders' submissions

- 3.6.1 The Commission had earlier directed SCCL to strive for getting coal allocation from its mines in Telangana however, it appears that despite SCCL expressing its ability and readiness to supply coal from its mines, the coal allocation for TPP is unchanged from Naini Coal Block. As a result, the electricity consumers of the State would have to bear the cost for coal transportation from Naini Coal Block for long-term.
- 3.6.2 In OP No. 13 of 2023, the DISCOMs submitted that landed price of coal (including transportation cost) from Naini Coal Block determined in accordance with the Central Electricity Regulatory Commission (Terms and Conditions of Tariff) Regulations, 2019 would be significantly lower than the current coal price being levied by SCCL for the coal supplied from its mines. It appears that SCCL has increased the coal price being supplied to its TPP for recovery of the disallowed capital cost of the TPP. SCCL has to confirm if the coal price has been increased for other procurers also. It is not clear as to the role of GoTS in the price fixation of coal supplied by SCCL.
- 3.6.3 SCCL submitted that it had filed a Review Petition seeking review of the capital cost approved by the Commission in the MTR Order dated 23.03.2023. The Commission may review the provisions of the Regulations before extending the same to the ensuing period so that imprudent expenditures are not allowed.

Petitioner's replies

3.6.4 The approvals for Naini Coal Block including Stage I and Stage II forest clearances have been obtained. SCCL is only awaiting the handing over of forest land by the State Government of Odisha. The Ministry of Coal has extended the Bridge Linkage taking into consideration the difficulties in commencement of coal production from Naini Coal Block. As per the Commission's directive, SCCL is striving to swap the allocation of Naini Coal Block with its mines in Telangana State. The coal swapping would be done after commencement of coal production from Naini Coal Block.

Commission's View

3.6.5 The coal allocation is not within the purview of the Commission. In the best interest of the electricity consumers of the State, SCCL shall have to pursue with the concerned authorities for transfer of coal allocation from Naini Coal Block to its own mines in Telangana.



CHAPTER 4 ANALYSIS AND CONCLUSION ON BUSINESS PLAN FOR FY 2024-25 TO FY 2028-29

4.1 **REGULATORY PROVISIONS**

- 4.1.1 Clause 7 of the Regulation No. 1 of 2019 stipulates the filing of Business Plan along with Capital Investment Plan for a duration covering at least the entire Control Period from FY 2019-20 to FY 2023-24.
- 4.1.2 The Commission is in the process of framing the Multi Year Tariff Regulation for the period commencing from FY 2024-25 onwards and has published the Draft Regulation inviting comments/suggestions/objections from the stakeholders on the provisions of the Draft Regulation. The norms of operation proposed in the Draft Regulation are as under:

"44.2 The Normative Annual Plant Availability Factor (NAPAF) for full recovery of Annual Fixed Charges shall be 85 per cent.

44.3 Normative Annual Plant Load Factor (NAPLF) for incentive for thermal Generating Stations/Units shall be 85 per cent.

44.4 Gross Station Heat Rate for existing coal-based thermal Generating Stations, except those covered under clause 44.5 shall be:

62.5 MW	250 MW sets	500 MW sets (sub-critical boilers)	600 MW sets (sub-critical boilers)
3000 kcal/kWh	2500 kcal/kWh	2450 kcal/kWh	2300 kcal/kWh

Note 1

In respect of 500 MW/600 MW Units, where the boiler feed pumps are electrically operated, the Gross Station Heat Rate shall be 40 kcal/kWh lower than the gross Station Heat Rate specified above.

Note 2

For Generating Stations having combination of 250 MW sets and 500 MW and 600 MW sets, the normative gross Station Heat Rate shall be the weighted average Station Heat Rate.

44.5 Gross Station Heat Rate for Coal based thermal power Generating Stations /Units achieving COD after 01.04.2019 shall be equal to **1.05 times the Design Heat Rate** (kcal/kWh);

Where the Design Heat Rate of a Unit means the Unit Heat Rate guaranteed by the supplier at conditions of 100% MCR, zero percent make up, design coal and design cooling water temperature/back pressure:

Provided that the Design Heat Rate shall not exceed the following maximum design Unit Heat Rates depending upon the pressure and temperature ratings of the Units:

Pressure Rating (kg/cm ²)	150	170	170	247
SHT/RHT (ºC)	535/535	537/537	537/565	537/565
Type of Boiler Feed Pump	Electrical	Turbine	Turbine	Turbine
Type of Boller Teed Fullip	Driven	driven	driven	driven
Maximum Turbine Cycle Heat	1955	1950	1935	1900
Rate (kcal/kWh)	1900	1900	1900	
Minimum Boiler Efficiency		_	192	
Sub-Bituminous Indian Coal	0.86	0.86	0.86	0.86
Bituminous Imported Coal	0.89	0.89	0.89	0.89
Maximum Design Unit Heat		1.1		
Rate (kcal/kWh)	$\sim \Lambda$	(18)		
Sub-Bituminous Indian Coal	2273	2267	2250	2222
Bituminous Imported Coal	2197	2191	2174	21 <mark>35</mark>

Pressure Rating (kg/cm2)	247	270	270
SHT/RHT (°C)	565/593	593/593	600/600
Type of Boiler Feed Pump	Turbine driven	Turbine driven	Turbine driven
Maximum Turbine Cycle		1	100
Heat Rate (kcal/kWh)	1850	1810	1800
Minimum Boiler Efficiency	Contract of	and the second	3
Sub-Bituminous Indian Coal	0.86	0.865	0.865
Bituminous Imported Coal	0.89	0.895	0.895
Maximum Design Unit Heat	A.L		
Rate (kcal/kWh)			
Sub-Bituminous Indian Coal	2151	2105	2081
Bituminous Imported Coal	2078	2034	2022

Provided further that in case pressure and temperature parameters of a Unit are different from above ratings, the maximum design Unit Heat Rate of the nearest class shall be taken: Provided also that where Unit Heat Rate has not been guaranteed but turbine cycle Heat Rate and boiler efficiency are guaranteed separately by the same supplier or different suppliers, the Unit Design Heat Rate shall be arrived at by using guaranteed turbine cycle Heat Rate and boiler efficiency:

Provided also that where the boiler efficiency is below 86% for subbituminous Indian coal and 89% for bituminous imported coal, the same shall be considered as 86% and 89%, respectively, for sub-bituminous Indian coal and bituminous imported coal for computation of Gross Station Heat Rate:

Provided also that maximum turbine cycle Heat Rate shall be adjusted for type of dry cooling system:

Provided also that if one or more Units are declared under commercial operation prior to 01.04.2019, the Heat Rate norms for those Units as well as Units declared under commercial operation on or after 01.04.2019 shall be lower of the Heat Rate norms arrived at by the above methodology and the norms specified in clause 44.4:

Note: In respect of Units where the boiler feed pumps are electrically operated, the maximum design Unit Heat Rate shall be 40 kcal/kWh lower than the maximum design Unit Heat Rate specified above with turbine driven boiler feed pumps.

44.6 Secondary fuel oil consumption norm for all thermal Generating Stations, shall be:

a) Coal-based Generating Stations: 0.50 ml/kWh

44.7 Auxiliary Energy Consumption for all coal-based thermal Generating Stations shall be as given in the Table below:

Particulars	With Natural Draft cooling tower or without cooling tower
(i) 62.5 MW	10.00%
(ii) 250 MW series	8.50%
(iii) 500 MW & above	
Steam driven boiler feed pumps	5.25%
Electrically driven boiler feed pumps	7.75%

Provided that for thermal Generating Stations with induced draft cooling towers and where tube type coal mill is used, the norms shall be further increased by 0.5% and 0.8%, respectively:

Provided further that additional Auxiliary Energy Consumption as follows may be allowed for plants with Dry Cooling Systems:

Type of Dry Cooling System	(% of gross generation)
Direct cooling air cooled condensers with mechanical draft fans	1.0%
Indirect cooling system employing jet condensers with pressure recovery turbine and natural draft tower	

Provided also that for thermal Generating Stations with Flue Gas Desulphuriser (FGD), additional Auxiliary Energy Consumption shall be allowed on case to case basis after prudence check.

44.8 Auxiliary Energy Consumption for hydro generating stations be as under:

Type of Station	Auxiliary Energy Consumption
Surface	CA ANA
Rotating Excitation	0.7%
Static	1.0%
Underground	11,000
Rotating Excitation	0.9%
Static	1.2%

....

44.10 Normative transit and handling losses for coal based Generating Stations, as a percentage of quantity of coal dispatched by the coal company during the month shall be:

(a)	Pit head Generating Stations		0.2%
(b)	Non-pit head Generating Stations	1.1	<mark>0.8</mark> %

- 4.1.3 The Commission shall specify the norms of operation in the final MYT Regulation for the period commencing from FY 2024-25 onwards and therefore, has not delved in to the Business Plan, except the Capital Investment Plan, in the present Petition.
- 4.1.4 The Capital Investment Plan proposed by SCCL and the Commission's analysis thereon is detailed hereunder.

4.2 CAPITAL INVESTMENT PLAN

Petitioner's submission

4.2.1 The summary of Capital Investment Plan and capitalisation plan proposed for the period from FY 2024-25 to FY 2028-29 is as under:

Table 4: Capital Investment Plan and capitalisation plan submitted bySCCL

(Rs. Crore)

	Conitol			Capital	isation		
Particulars	Capital Investment	FY 2024-25	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	Total
FGD system	736.00	696.00	40.00		-	-	736.00
In-furnace modifications for NOx compliance	40.00	-	20.00	20.00		-	40.00
O&M modules	68.00	32.00	36.00		12	-	68.00
Railway works	240.00	160.00	80.00	-		-	240.00
Township civil works	6.00	1.00	1.50	1.50	1.00	1.00	6.00
Implementation of flexible operation scheme as per CEA Regulation	20.77	20.77	4	7.	1	2.	20.77
Total	1110.77	774.77	177.50	156.50	1.00	1.00	1110.77

FGD system

4.2.2 MoEF&CC, vide its notification dated 07.12.2015 brought out the amendments to Schedule – I of Environment (Protection) Rules, 1986 for emission norms applicable to TPPs. In accordance with the above notification, the following emission norms are applicable for Singareni TPP:

Pollutants	Emission norm
Particulate Matter (PM)	50 mg/Nm ³
Sulphur Dioxide (SO ₂)	200 mg/Nm ³
Oxides of Nitrogen	450 mg/Nm ³
Mercury	0.03 mg/Nm ³

 Table 5: Emission norms applicable for Singareni TPP

4.2.3 SCCL is currently complying with the emission norms of PM and mercury. SCCL has awarded the FGD works to M/s PES Engineering Pvt Ltd. for compliance with SO₂ emission norms and the works are in progress. The scheduled completion of the FGD system is August, 2024. The Commission had accorded in-principle approval for the FGD system vide the MYT Order dated 28.08.2020.

In-furnace modifications for NOx compliance

4.2.4 The Commission had accorded in-principle approval for in-furnace modification for NOx compliance vide the MYT Order dated 28.08.2020.

SCCL plans to work closely with the OEM for the said works.

O&M modules

4.2.5 Some of the generating stations which have been supplied BHEL Units of 600 MW have recently experienced major breakdowns. The past experiences show that the OEM requires a high lead time of around one year to supply new equipment in case of failures. This high lead time is attributable to import of input materials and arranging the required machining and assembling activity. Any shutdown due to failure of equipment will impact the cash flows of both SCCL and the DISCOMs by way of under recovery of AFC and procurement from alternate sources respectively. The proposed O&M modules would improve the Availability for the ensuing Control Period as well as the entire life of the plant.

Railway works

- 4.2.6 The railway siding work was commissioned in FY 2018-19 and most of the coal for power generation is received through railway mode. Currently, the railway locos are running with diesel engines and manually managed signalling system. The railway authorities have advised to arrange for overhead electrification system along with necessary signalling and telecommunication works to ensure safe running of railway wagons. The railway electrification works would be taken up as per the cabinet decision of Government of India. The signalling & telecommunication work is proposed to be undertaken for handling rake traffic which is expected to further increase with addition of 800 MW unit, for ensuring safety and saving in man-hours and expenditure.
- 4.2.7 M/s RITES was the consultant for the railway siding works. As per the detailed report prepared by M/s RITES for overhead electrification and telecommunication work, the electrification work would be completed in FY 2024-25 and signalling work would be completed in FY 2025-26.
- 4.2.8 In order to facilitate unloading of rakes from BOXN wagon, installation of two(2) nos. wagon tippler and laying of track lines for wagon tippler is necessary.After the commencement of coal production from Naini Coal Block, it would be difficult to transport coal through BOBRN rakes as railways prefer to transport

coal through BOXN wagons considering the travel distance.

Township civil works

4.2.9 The employees residing in the township are facing hardship due to the remoteness of the township. Therefore, SCCL has proposed to undertake works such as construct a shopping complex, roads and drains, integrated water supply works, fencing around the park, protected parking for vehicles and other infrastructure for enabling modest living conditions inside the township.

Implementation of flexible operation scheme as per CEA Regulation

4.2.10 As per the approved PPA, the DISCOMs cannot backdown below 65% of the capacity. However, as per the Central Electricity Authority (CEA) has notified the (Flexible Operation of Coal based Thermal Power Generating Units) Regulations, 2023 notified on 30.01.2023, the technical minimum for the 600 MW unit would be 40% i.e., 240 MW. Further, the minimum ramp rate capability should be 3% per minute i.e., 18 MW/min between 100% and 70% (i.e., between 600 MW and 420 MW), 2% per minute i.e., 12 MW/min between 70% and 55% (i.e., between 420 MW and 330 MW), 1% per minute i.e., 6 MW/min between 55% and 40% (i.e., between 330 MW and 240 MW). These Regulations have to be complied within one (1) year from the date of notification.

Commission's View

FGD system

4.2.11 The Commission in the MYT Order dated 28.08.2020 ruled as under:

"5.4.28 As the target date for complying with SO₂ emission norm was deferred by the competent authority and such uniform dispensation was given across the country, the Commission deems it a fit case to exercise the power of relaxation of Clause 7.19.1 regarding the criteria for allowing additional capitalisation i.e., within the original scope of work and upto the cut-off date for allowing the capital investment for FGD system beyond the original scope of work and after the cut-off date. Clause 7.19.1(I) provides for capital expenditure for complying with statutory norms for Environment in accordance with the appropriate notifications of MoEF&CC. Therefore, the capital investment for FGD system is allowable under Clause 7.19.1(I) of the Regulation No.1 of 2019. The Commission vide its Order dated 08.02.2020 accorded in-principal approval for undertaking the works for complying with revised emission norms. The Commission hereby confirms the said approval.

5.4.29 As FGD is still under implementation stage across the country, in the absence of any yardstick on market trends to compare the cost estimates of SCCL, the Commission is not expressing any opinion on the cost estimates at this stage. The Commission understands that SCCL is in the process of awarding the works of procurement and installation of FGD system through competitive process. The Commission expects such competitive procurement to yield the most economical prices aligned to market trends. The Commission shall carry out the prudence check of the cost of FGD system in true-up for the relevant year after commissioning of the same."

4.2.12 SCCL submitted that it has awarded the works of FGD system through competitive bidding process. The works being still in progress, the Commission is not expressing any opinion on the proposed completion cost at this stage. The Commission shall carry out the prudence check of the cost of FGD system in true-up for the relevant year after commissioning of the same.

In-furnace modifications for NOx compliance

4.2.13 The Commission, in the MYT Order dated 28.08.2020, ruled as under: "5.4.30 MoEF&CC vide its notification dated 07.12.2015 has introduced NOx emission norm of 300 mg/Nm³. The Units are designed for NOx emission levels of 750 mg/NM³. SCCL has claimed the capital investment for complying with the NOx emission norm under Clause 7.19.1(e) and 7.19.1(l) of the Regulation No.1 of 2019. The DISCOMs submitted that the NOx emission norm has been revised from 300 mg/NM³ to 450 mg/NM³ and the capital investment is not required to be allowed under this head as the project is complying with the emission norm of 450 mg/Nm³. SCCL submitted that the emission norm of 450 mg/Nm³ has not yet attained finality. The Commission finds merit in SCCL's submission in this regard. The maximum NOx emission levels submitted by SCCL for FY 2017-18, FY 2018-19 and FY 2019-20 are higher than 300 mg/Nm³. 5.4.31 In accordance with Clause 7.19.1 of the Regulation No.1 of 2019 the capital investment claimed for complying with NOx emission norm is not allowable as the same is beyond the original scope of work and after cut-off date. SCCL has not claimed relaxation in Clause 7.19.1 in its claim of capital investment. However, in line with the approval for FGD system, the Commission deems it a fit case to exercise the power of relaxation of Clause 7.19.1 regarding the criteria for allowing additional capitalisation i.e., within the original scope of work and upto the cut-off date for allowing the capital investment for NOx compliance beyond the original scope of work and after the cut-off date. Clause 7.19.1(I) provides for capital expenditure for complying with statutory norms for Environment in accordance with the appropriate notifications of MoEF&CC. Therefore, the capital investment for NOx compliance is allowable under Clause 7.19.1(I) of the Regulation No.1 of 2019. The Commission vide its Order dated 08.02.2020 accorded in-principal approval for undertaking the works for complying with revised emission norms. The Commission hereby confirms the said approval.

5.4.32 The Commission is not expressing any opinion on the cost estimates at this stage. The Commission shall carry out the prudence check of the cost in true-up for the relevant year after commissioning of the same."

4.2.14 In the MYT Order dated 28.08.2020, the Commission had accorded inprinciple approval for undertaking the works for NOx compliance as the emission norm at that time was 300 mg/NM³. Subsequently, the same has been revised to 450 mg/NM³. The Commission has sought the actual emission level of NOx but SCCL has not submitted the same. Although the said works were approved for execution during the Control Period from FY 2019-20 to FY 2023-24, SCCL has not actually undertaken these works and is now proposing to undertake in the ensuing Control Period from FY 2024-25 to FY 2028-29. The Commission deems it prudent to continue the in-principle approval accorded for the said works in the MYT Order dated 28.08.2020 as the said works are towards the compliance of emission norms. The Commission is not expressing any opinion on the proposed cost at this stage. The Commission shall carry out the prudence check of the final executed cost in true-up for the relevant year after commissioning of the same..

O&M modules

4.2.15 The Commission, in the MYT Order dated 28.08.2020, ruled as under:

"5.4.34 From the above, the prime criteria for taking consultancy services of NTPC was its operational experience with BHEL Units. SCCL has already procured mandatory spares of critical auxiliaries under the BTG package. The consumers cannot be unduly burdened for the acts of omission on part of the Petitioner. The Commission does not find any merit in the reliance placed by SCCL on CEA advisory and the same does not amount of Change in Law as submitted by SCCL. In view of the above, the Commission does not find it prudent to exercise the power of relaxation of Clause 7.19.1 for allowing capital investment for O&M modules."

- 4.2.16 SCCL has reiterated its earlier submissions in the present Petition. The only change in position is that the OEM warranty has purportedly expired in the year 2021. SCCL submitted that the initial spares approved by the Commission are within the ceiling limit and the proposed O&M modules can be accommodated within the ceiling limit of initial spares. The Petitioner's apprehension is devoid of merit. The initial spares are allowable only during the allowable period as per the Regulation and within the specified ceiling limit.
- 4.2.17 SCCL has already procured mandatory spares of critical auxiliaries. The consumers cannot be unduly burdened for the acts of omission on part of the Petitioner. Therefore, the Commission does not approve the proposed capital investment towards O&M modules. The Commission notes that SCCL is repeatedly including the claims towards capital expenditure which has been disallowed by the Commission in earlier Orders. SCCL is directed not to include such disallowed claims in its Petitions unless there is a material change in the premise of proposing such expenditures.

Railway works

4.2.18 The Commission, in the MYT Order dated 28.08.2020, ruled as under:

"5.4.35 The Commission has gone through the details of railway works and justification submitted by SCCL for the same. In accordance with Clause 7.19.1 of the Regulation No.1 of 2019 the capital investment for railway works is not allowable as the same is after cut-off date. The consumers cannot be unduly burdened for the acts of omission on part of the Petitioner. In view of the above, the Commission does not find it prudent to exercise the power of relaxation of Clause 7.19.1 for allowing capital investment for railway works."

- 4.2.19 SCCL, during the Public Hearing, submitted that it does not press for the capital investment towards Railway works which have been disallowed by the Commission in the MYT Order dated 28.08.2020. However, in its written submission after the Public Hearing, it has reverted to its original claim in the Petition.
- 4.2.20 The overhead electrification works and signalling works were disallowed by the Commission in the MYT Order dated 28.08.2020 and therefore, the Commission does not find the need to revisit the same in this Order. As regards the capital investment towards wagon tipplers and track lines for the same, the proposal is purportedly for coal to be procured from Naini Coal Block. The Commission does not find it prudent to allow the same as SCCL is putting its efforts to swap the allocation of Naini Coal Block with the coal allocation from its own mines, after the commencement of coal production from Naini Coal Block. Also, the Commission is not expressing anything on the merit of the necessity of the said works even for the coal to be procured from Naini Coal Block. SCCL is at liberty to evaluate the said works with a fresh outlook keeping in hindsight the option of swapping of Naini Coal Block with the coal allocation from its own mines.

Township civil works

4.2.21 SCCL, during the Public Hearing, submitted that it does not press for the capital investment towards township civil works which have been disallowed by the Commission in the MYT Order dated 28.08.2020. However, in its written submission after the Public Hearing, it has reverted to its original claim in the Petition. The township civil works were disallowed by the Commission in the MYT Order dated 28.08.2020 and therefore, the Commission does not

find the need to revisit the same in this Order.

Implementation of flexible operation scheme as per CEA Regulation

4.2.22 SCCL submitted that it has to incur the capital investment for complying with the CEA Regulation but it has neither justified as to why it cannot achieve the without incurring the proposed capital investment nor it has submitted the works proposed to be undertaken along with corresponding cost details. Therefore, the Commission does not approve the capital investment for the same in this Order. The Commission is in the process of framing the Multi Year Tariff Regulation for the period commencing from FY 2024-25 onwards. If the need arises, SCCL may seek the approval of the Commission for undertaking the capital works required for complying with CEA Regulations in accordance with the provisions of the Multi Year Tariff Regulation to be issued by the Commission.

4.3 SUMMARY

4.3.1 Based on the above analysis, the Commission has allowed the capital investment plan for the period from FY 2024-25 to FY 2028-29 for STPP as under:

Table 6: Capital Investment Plan for the period from FY 2024-25 to FY2028-29 approved in this Order

		(Rs. Crore
Particulars	Claimed	Approved
FGD system	736.00	Deferred
In-furnace modifications for NOx compliance	40.00	0.00
O&M modules	68.00	0.00
Railway works	240.00	0.00
Township civil works	6.00	0.00
Implementation of flexible operation scheme as per CEA Regulation	20.77	0.00

This Order is corrected and signed on this the 29th day of December, 2023.

Sd/-	Sd/-	Sd/-
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(BANDARU KRISHNAIAH) (M.D.MANOHAR RAJU) (T.SRIRANGA RAO) MEMBER MEMBER CHAIRMAN

// CERTIFIED COPY //

ANNEXURE 1 PUBLIC NOTICE



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ಟ್ರಮನಲಿನು ಕ ಕಿನಿಮಾಹಿತಿ ಕ ತಿಮಾಹಿ ತಂಗ ತ್ರಿಕಿಟ್ ಲ್ಲಕ್ಕ ವಿ ರಿಂದು ತರಗಿನ ತನ್ನಿಟಿಕಲು/ ಸಿಲ ತ್ರಿಕೆಯ ಇನ್ನಿಟಿಕಾ ರಿನದು ಇನ್ನಿಟಕಾ	සිට සේ පර්චි ව වංෂා කාලයා විරාධ කිරීමා කරාජනා ම කරේමාක ධර්වා විර මාලේමාක ධර්වා විර මාලේමාක විද්යා කිරීමා කාලයා විරෝහ කිරීමා කාලයා විද කිරීමා කාලයා විද කිරීමා කාලයා කර මූ	సరేశిరిపేత రిమరామా వర్ష రిమ ఆర్టేపణలు/ పలహాలు ఉ సరరు అర్జేపణలు/ పలహాలుకు రాజా రిమరామా, జనియిల్ అర స్ట్రీ జిలా ఏదేరి విరియోగదారుక విద్యులుతే, ప్రష్టుగా పేర్పోవన పో అవిమయాన్ని జాడా పృష్టు పర విధరాలను అతపథపథపరిన	కమచ్ ప్రెటర్ సదిధంగా సంతమ వంప ద్వర్శల/ మరియు కాంటా] స కేటగిరి తరపర నిరు ఆర్థోపికారిన గా పిర్పినవరిను
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ANNEXURE 2 LIST OF STAKEHOLDERS WHO SUBMITTED THE WRITTEN COMMENTS/OBJECTIONS/SUGGESTIONS

SI. No.	Name and address of the stakeholder
1	Sri M.Venugopala Rao, Senior Journalist & Convenor, Centre for Power
	Studies, H.No.1-100/MP/101, Monarch Prestige, Journalists' Colony,
	Gopanpally, Serlingampally Mandal, Hyderabad – 500 032
2	Sri M.Thimma Reddy, Convenor, People's Monitoring Group on Electricity
	Regulation, 139, Kakatiyanagar, Hyderabad - 500 008
	Southern Power Distribution Company of Telangana Ltd., Corporate Office, 6-1-50, Mint Compound, Hyderabad



ANNEXURE 3 LIST OF STAKEHOLDERS WHO PARTICIPATED IN PUBLIC HEARING HELD ON 31.10.2023

\$ SI. No.	Name and address of the stakeholder
1	Sri M.Venugopala Rao, Senior Journalist & Convenor, Centre for Power
	Studies, H.No.1-100/MP/101, Monarch Prestige, Journalists' Colony,
	Gopanpally, Serlingampally Mandal, Hyderabad – 500 032
	Southern Power Distribution Company of Telangana Ltd., Corporate Office, 6-1-50, Mint Compound, Hyderabad

