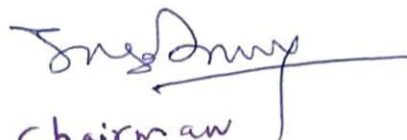



S.No	Query raised by BEDA	Reply by Committee
1	<p>On a preliminary perusal of the study report we are deeply concerned and disturbed by several apparent distorted, vague and/or untrue facts and references in the study report. It is clearly misdirected, misconceived and vitiated by hostile bias. Further, the study report is signed only by three of several members and we have reason to suspect that there were no proper meetings and proceedings of the study committee. We seek leave and reserve the right to make more elaborate and specific comments after we have obtained inspection and copies of the documents and records as hereinafter requested.</p>	<p>With reference to The Hon'ble Commission letter, TSREDCO On behalf committee has send an E-mails to Biomass and Sugar Mill Associations to provide the information for preparation of study for determination of Normative Parameters for Biomass & Bagasse Based Power Plants. (Reference Emails Enclosed has Annexure-1)</p> <p>Further Member convener has called for meetings, which conducted on 15th November 2022 and 24th December 2022 at TSREDCO Head office, Hyderabad.</p> <p>However, we have received partial data from M/s. Rithwik Power Projects Limited without balance sheets dated. 18.11.2022 and one more company i.e., M/s. Shalivahana Green Energy Ltd., provided the cost of fuel details through mail dated 29.12.2022 and the company is submitting the Power and Fuel consumption details every year to TSREDCO. Based on the data we have prepared the report.</p> <p>Apart from the above, no other power plants and associations are not provided any data to study operative parameters.</p>
2	<p>On page 1 of the study report, in the first paragraph, there is reference to "secondary data to ascertain the moisture content....". In the second para there is reference to "other secondary research reports / data". We request and require that all such secondary data referred to and relied upon be made available to us to enable us to verify their authenticity, veracity, relevance and the inferences sought to be drawn therefrom.</p>	<p>Further, No Biomass power plant is in operation at the time of study, committee has not able to assess the moisture level of that fuels they are procuring.</p> <p>Hence the study reports of CEA/CERC and APERC and other web related information considered for Moisture content of biomass fuels.</p> <p>Details Enclosed as Annexure -5 APERC Order OP 32 of 2014 & annexure 2</p>
3	<p>On page 1 it has been stated that Rithwik Power Projects Ltd (RPPL) had submitted "self certified fuel mix in year wise". The company informs that the table below mentions fuel mix completely at variance with what was stated by them, and that they gave no "self certified" documents. We request that a copy of the specific document with so-</p>	<p>M/s Rithwik Power Projects Ltd submitted documents vide email dated 18/11/2022 and 26/12/2022. Details Enclosed as Annexure -2</p> <p>Hence we considered that, the documents are self-certified document which came through e-mail.</p>

S.No	Query raised by BEDA	Reply by Committee
	called "self certification" purportedly relied upon by the committee be made available to verify the authenticity and veracity of the contents of the study report	
4	On page 2 of the study report, it has been stated that Shalivahana Green Energy Ltd (SGEL) had submitted "self certified fuel mix in year wise". The said company informs that no such document was submitted by them and that they have also written to the Hon'ble Commission" for a copy. We request that a copy of the specific document be made available to verify the authenticity and veracity of the contents of the study report.	M/s. Shalivahana Green Energy Ltd (SGEL) has submitting the yearly Power and Fuel consumption details to TSREDCO, which is SNA of Telangana State for allotment of coal from SCCL. Hence committee considered the fuel mix data for preparation of the report. The submitted documents considered as "Self certified documents". Details enclosed as Annexure -3
5	On page 3, reference is made to audited data purportedly submitted by the two companies. While SGEL informs that nothing of the sort was submitted by them. RPPL states that there was no mention of audit by them. We request that a copy of the specific document be made available to verify the authenticity and veracity of the contents of the study report	As per the Committee observation is Self-certification is considered as Audited data. Enclosed in the submitted documents as Annexure-2 & Annexure-3 .
6	On page 4, the table purports to refer to "BEDA submission data". No such data was submitted by this Association to the committee. We request that a copy of the specific document be made available to verify the authenticity and veracity of the contents of the study report.	Regarding the moisture content, BEDA Submission data; M/s. RPPL Submitted test reports of Moisture content of fuel for the year 2021 and The data for moisture content in as fired condition is not available anywhere and also committee considered recent APERC Order OP 32 of 2014 dated 15.12.2022 for determination variable cost for the period 01-04-2014 to 31-03-2019. Enclosed : Annexure-4 : Test reports Annexure -5: APERC Order OP 32 of 2014
7	On page 6, it is vaguely stated that the "Committee has undertaken market research from various sources" with respect to fuel prices. With respect to fuel price escalation also there is a vague mention of "market research on page 7. We require to see the records of the so-called market research and the sources of information to verify the authenticity and veracity of the contents of the study report and to submit our objections and comments thereon.	Further, it is to submit that, the fuel cost of M/s RPPL has submitted through vide email dated 18.11.2022 and M/s. Shalivahana Green Energy Limited also submitted fuel cost details through vide Email dated 03.01.2023. As the data provided by vendors is not supported with balance sheet and committee also undertook market research from local vendors like what is the cost of Rice husk on verbal communication they have shared the prices and also considered APERC order on OP 32 of 2014 dated 15.12.2022 for determination variable cost for the period 01-04-2014 to 31-03-2019.

S.No	Query raised by BEDA	Reply by Committee
	authenticity and veracity of the contents of the study report and to submit our objections and comments thereon.	OP 32 of 2014 dated 15.11.2022 for determination variable cost for the period 01-04-2014 to 31-03-2019. Enclosed : Annexure -6: SGEL fuel cost Email data
8	From the above it is seen that substantial facts and averments in the study report are prima facie seriously questionable. Natural Justice and the mandatory principles of transparency require that all the material upon which the study report is purportedly based is made available for inspection and copies by the objectors who will be seriously affected by the outcome of the present proceedings	Not Applicable
9	As the Hon'ble Commission has been pleased to extend the time for submitting comments to 10.07.2023, it is a matter of urgency that the information requested above is made available urgently so that the Association and its members are able to effectively submit their views / objections/comments. Otherwise, the biomass developers will be seriously prejudiced and subject to irreparable harm and injury	Not aplicable


Chairman
of
Committee


Convenor of
Committee


member
of
Committee