

Date. 26.12.2025

To,

The Secretary,

Telangana Electricity Regulatory Commission,
Vidyut Niyamtran Bhavan, GTS Colony,
Kalyan Nagar, Hyderabad – 500 045.

From,

The Director,

People's Sentinel Forum,
Plot No 174, Ravi Society, Mahendra Hills, East Marredpally,
Secunderabad, Telangana – 500026

Subject: Request for Additional Information/Data under Regulation 1 of 2019 for the scrutiny of STPP (1200 MW) Tariff Filing.

Sir,

Category A: Manpower & Employee Cost Apportioning

1. Dedicated vs. Apportioned Staff: Provide a detailed break-up of the total 42,000+ employees of SCCL. Specifically, list the number of employees physically stationed at STPP (1200 MW) vs. "Corporate/Mining Headquarters" staff whose salaries are partially charged to STPP. A detailed list of corporate employees whose salaries are partially charged to STPP despite not being stationed at the plant.

2. Contractual Labor Audit: Provide the annual payment made to O&M Contractors (e.g., Power Mech) and clarify why high internal "Employee Expenses" are claimed when the majority of plant operations are outsourced.

3. Wage Structure Variance: Compare the average salary of an SCCL employee (governed by NCWA XI) stationed at STPP against the NTPC salary benchmarks for similar supercritical units.

Category B: Coal Pricing & Quality Transparency

4. Mine-Wise Cost of Production: Provide the actual Cost of Production (COP) for the specific mines (Srirampur/Mancherial) supplying coal to STPP.

5. Bridge Linkage Documentation: Provide a copy of the MOU/Fuel Supply Agreement (FSA) between SCCL (Mining) and STPP (Power) that mandates the 20% premium.

6. GCV Loss Analysis: Provide the "Third-Party Sampling Reports" for the last 12 months showing the GCV (As Received) at the plant gate vs. GCV (As Billed) at the mine loading point.

Category C: O&M & Capitalization

7. **R&M Expense Break-up:** Provide a list of all "Repair and Maintenance" activities for FY 2024-25 exceeding ₹5 Crores. Clarify if any of these were "Capitalized" (added to the Gross Fixed Assets).

8. **Auxiliary Power Consumption Log:** Provide the 15-minute block-wise data for Auxiliary Energy Consumption (AEC) for the months where AEC exceeded the 5.75% normative limit.

Category D: Land Diversion

9. **Approval of Diversion:** Provide a certified copy of the Government Order (G.O.) or permission from the Revenue Department/District Collector for the diversion of Land at Jaipur (Mancherial) from "Mining/post mining status" to "Industrial Usage" for STPP plant.

10. **Double capitalization check:** Clarify if the cost of the land used for STPP was already included in the Mining Project Cost of the respective mines. If yes, explain how it is justified to include the same cost again in the **STPP Power Project Capital Cost**.

11. **Valuation Methodology:** Provide the basis for the ₹57.88 Crore (as of 31.01.2025) claimed under "Land" in the capital cost break-up. Does this reflect the actual acquisition cost, or is its "Market Value assessment"?

Category E: Coal Quality & Quantity Audit:

12. **Inspection Transparency:** Clarify if CSIR-CIMFR or an independent 3rd party is inspecting coal quality at the loading and unloading points, or if SCCL staff are "self-certifying" their own supply.

We request that directions may be issued to SCCL to provide the above information at the earliest to enable us to submit informed comments/suggestions on SCCL's ARR and Tariff Petition.

Yours sincerely,



(Mohan R. Pinninti)

Director

People's Sentinel Forum

Mobile no. 9989693556,

Email: mrpinniti999@gmail.com

Copy to The Director (Finance), Power Projects, 3rd Floor, Singareni Bhavan, Red Hills, Hyderabad.