

**To,**

**1. The Secretary**

Telangana State Electricity Regulatory Commission (TGERC)  
Vid�ut Niyantan Bhavan, GTS Colony,  
Kalyan Nagar, Hyderabad

**2. The Director (Finance)**

Singareni Collieries Company Limited (SCCL),  
Singareni Bhavan, Red Hills,  
Hyderabad.

**Subject: Submission of Objections and Request for Additional Information regarding the Aggregate Revenue Requirement (ARR) and Tariff Filings – Reg.**

**Respected Sir,**

On behalf of the People's Sentinel Forum, I am submitting the following queries and requests for additional information/clarification regarding the current tariff proceedings. To ensure transparency and protect the interests of the consumers, we request the Commission to direct the utilities/SCCL to provide the following data:

**1. Request for Legible Documentation**

Several sections of the submitted PDF filings are of extremely low resolution, making them illegible. Specifically, the pricing data and Annexure-H (Pages 340 to 345) cannot be read. We request a high-resolution, legible copy of the total ARR filing to be made available immediately.

**2. Coal Pricing Methodology**

Please provide the detailed procedure, including the base price, statutory levies, and transport components, used to determine the cost of coal per tonne supplied to the Singareni Thermal Power Plant (STPP) and TGGENCO thermal power stations.

**3. Mine-Wise Operational Data (Last 3 Years)**

To evaluate the reasonableness of fuel costs, please provide a mine-wise breakdown for the last three financial years covering:

- \* Number of employees engaged and total manpower costs.
- \* Operational costs (Men & Machinery) involved in coal extraction.
- \* Total quantity of coal mined vs. actual supply.
- \* The final cost of coal per tonne at the pit-head.

**4. Capital Expenditure**

Please provide the Capital Cost of STPP based on finalized, audited figures rather than provisional estimates.

### **5. Social Overheads**

Provide a detailed breakup of the amounts spent on social overheads and specify the quantum of these expenses that have been loaded onto the ARR and passed through to consumers.

### **6. Transfer of Geographical Advantages**

Explain the mechanism by which the geographical proximity of SCCL mines to STPP and TGENCO plants is being passed on to the utilities. Currently, the pricing does not seem to reflect the logistical advantages of being pit-head or near-pit-head stations.

### **7. Impact of Coal Pricing on Consumer Tariffs**

It is observed that the high rate of coal supplied by SCCL has led to an abnormal increase in generation costs, resulting in a direct tariff burden on the general public. We seek a justification for these rates compared to national benchmarks.

### **8. Quality Control and Grade Slippage**

SCCL has been supplying lower-grade coal at costs higher than comparable Coal India Limited (CIL) rates. We request data on the grade variations and grade slippages encountered between the point of dispatch and the point of receipt, which have led to significant financial losses and operational inefficiencies for TGENCO.

### **9. Provide details on coal inspection at loading points (mines) and unloading points: Any Tripartite**

- i. Whether any third-party agency was engaged; if so, provide details of the agency, their inspection reports, and deviation notes Number of deviations noticed against the Fuel Supply MOU between SCCL & STPP and actual supply quantity.
- ii. Quantity slippage (actual vs. as per agreement).
- iii. Moisture component variations noticed.
- iv. Give details of debit/credit quantity and bill raised details may be furnished.

### **10. Monopoly Pricing Concerns**

It appears that SCCL is leveraging its monopoly position to generate windfall profits by imposing high costs on TGENCO and Discoms. We request a disclosure of how these profits are distributed and whether this "arm-twisting" pricing policy is consistent with the public interest.

**Conclusion:**

The People's Sentinel Forum requests the Hon'ble Commission to ensure that the above information is placed on the public record and that SCCL/Utilities provide a point-wise response to these concerns before the conclusion of the public hearing.

Sincerely,

(Signature) 

**(Mohan R. Pinninti )**

**Director, People's Sentinel Forum**

Plot No 174, Ravi Society, Mahendra Hills, East Marredpally,  
Secunderabad, Telangana – 500026

Mobile no. 99896 93556  
Email: mrpinninti999@gmail.com