



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

Ref No. STPP/COML/2020-21/97

Date: 10.03.2020

To  
The Secretary,  
Telangana State Electricity Regulatory Commission,  
Singareni Bhavan,  
Hyderabad.

Sir,

Sub: Additional submission to MYT petition FY 2019-20 to FY 2023-24 as directed by the Hon'ble Commission.

As required by the Hon'ble Commission the above subject matter is now being filed as additional submission.

Encl: As above.

Yours Sincerely

  
Chief Technical Consultant  
2X600 MW STPP, SCCL.

**Chief Technical Consultant**  
**2X600MW, STPP**

Sub: Additional submission requesting issuing clarification in relation to clauses given in TSERC Regulation No. 01 of 2019 for energy charge rate computation.

It is to humbly state that there is some difficulty in interpreting clauses 21.6, 21.7 and 21.10 of TS 01 of 2019 related to applicability of as fired GCV or as received GCV of coal for determination of energy charge rate.

The relevant portion of the clauses are quoted below:

Clause 21.6.

“Energy charge rate (ECR) in Rupees per kWh on ex-power plant basis shall be determined to three decimal places .....

Weighted Average Gross calorific Value of coal **as received**, in kCal per kg for coal based stations”

Clause 21.7

“The Generating Entity shall provide to the Beneficiaries of the Generating Station the details of parameters of GCV and price of fuel i.e., domestic coal, imported coal, e-auction coal, natural gas, RLNG, liquid fuel etc., as per the forms prescribed at Annexure I of CERC Regulations;

Provided that the details of blending ratio of the imported coal with domestic coal, proportion of e-auction coal and the weighted average GCV of the fuels **as fired** shall also be provided separately, along with the bills of the respective month.....”

Clause 21.10

“21.10. Any variation in fuel prices on account of change in the Gross Calorific Value (GCV) of coal or gas or liquid fuel shall be adjusted on a monthly basis on the basis of average GCV of coal or gas or liquid fuel in stock, **as fired** and weighted average landed cost incurred by the Generating Entity for procurement of coal, oil, or gas or liquid fuel, as the case may be for a station.”

As can be seen from the above, there is lack of clarity in application of either as fired or as received GCV of coal for determination of energy charge rate.

It is to submit that the SERC's are guided by the principles and methodologies of CERC while specifying regulations as per section 61(a) of Electricity Act, 2003.

CERC tariff regulation 2019-24 provides that the energy charge computation shall be done based on GCV of coal as received less 85 Kcal/kg on account of variation during storage at generating station.

The relevant portion is given below:

43 Computation and Payment of Energy Charge for Thermal Generating Stations

(1) The energy charge shall cover the primary .....

CVPF = (a) Weighted Average Gross calorific value of coal **as received, in kCal per kg for coal based stations less 85 Kcal/Kg** on account of variation during storage at generating

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Further CEA, in recommendation to CERC during finalisation of 2019-24 tariff regulation provided that

“CEA has suggested that above mentioned margins would vary from plant to plant, season to season and to varying coal characteristics and accordingly a margin of 85-100 kCal/kg for pit head stations and a margin of 105-120 kCal/kg for non-pit head stations may be allowed to the generators as a loss of GCV measured at Wagon top at unloading point till the point of firing in the boiler.”

Further, it is to kindly submit that MYT regulations in Maharashtra Electricity Regulatory Commission (clause 50.7), Gujrat Electricity Regulatory Commission (clause 58.5) and draft regulation in Orissa Electricity Regulatory Commission (clause 26.11) have incorporated energy charge rate computation as given by CERC regulation or recommended by CEA or on the basis of as fired GCV of coal.

You are kindly requested to look into the issue and provide necessary clarifications considering the above.

  
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