सी एस पी जी सी एल
CSPGCL

CHHATTISGARH STATE POWER GENERATION COMPANY LIMITED

(A Govt. of C.G. Undertaking)

NO. 03-09/CIP petition/47 Raipur. Dtd 20/01/25

To,

The Secretary,
Chhattisgarh State Electricity Regulatory Commission
New Shanti Nagar, Raipur.

Sub: Additional submission in respect of Petition no. 99 of 2024.

Ref: CSERC's letter no. P No. 99 of 2024/2382 dtd 30.12.2024.

Respected Sir,

Hon'ble Commission, vide captioned letter has desired some additional information in respect of Petition no 99 of 2024.As desired CSPGCL humbly makes additional submission in respect of the subject petition for kind consideration please.

Encl: As above.

CHIEF ENGINEER (C&RA)
CSPGCL, Raipur

Office of the Executive Director (C&RA),
Shed No. 06, Vidyut Sewa Bhawan Complex, Dangania, Raipur– Pin 492013; CIN No. U40108CT2003SGC015821
Phone : 0771-2574907; Fax : 0771-2574806; mail : ce.cncp@gmail.com; web site : www.cseb.gov.in
AN ISO 9001:2008 COMPANY

SUBMISSION OF ADDITIONAL INFORMATION

(W.r.t. letter no. P. No. 99 of 2024/2382, Raipur, Date: 30/12/2024)

1. CSPGCL should provide the formats of CIP in MS Excel with all the annexures for FY 2025-26 for GP-III mine and CSPGCL's conventional Thermal & Hydro Plants.

   CSPGCL SUBMISSION: - The CIP petition is in word format, without any excel modeling. Yet, as desired, the word table converted to excel is being mailed.

2. CSPGCL should submit the copy of the CIP Petition in MS Word.

   CSPGCL SUBMISSION: - The word copy of the petition has already been submitted vide e-mail on 11th December 2024. For ready reference, the screen shot is submitted as Annexure-1.

3. CSPGCL should provide the scheme –wise Investment plan for FY 2025-26 and provide the following:

(a) Previously approved project cost if it has been already approved in the MYT order.

CSPGCL SUBMISSION: In the above context, with due respect it is submitted that as per the well settled terminology followed by Hon'ble Commission, the terminology "Projects" is used for a plan for new power station while other capex plans are described as "capital schemes". Hence the phrase used hereafter (unless otherwise specified) is "schemes" in place of "projects".

Further, it is to submit that the capital cost approval has been dealt in the CIP orders and not in the MYT orders. The queries have been inferred accordingly.

It is respectfully submitted that for "spill over schemes", in the petition, against each of such scheme, complete reference to the previous approval has been submitted. Leave is craved for further explanation on any specific scheme, as may be required, during the TVS.

(b) Capitalized project cost till now on this project

CSPGCL SUBMISSION: It is respectfully submitted that it is only for the few schemes that part capitalisation has been claimed in the previous true up orders / the petition for FY 23-24. Along with such capitalisation, the expected capitalisation in FY 24-25 has also been considered in the petition and such total capitalized cost is already mentioned in the sub column "Prior FY 25-26" under the Main Column "Expected Capitalisation". Leave is craved for further explanation, on any specific scheme, as may be required, during the TVS.

(c) Project year wise capitalization in FY 2025-26 and beyond

CSPGCL SUBMISSION: It is respectfully submitted that in the petition, against each of such scheme, the expected capitalisation in FY 25-26 has also been considered in the petition in the sub column "FY 25-26" under the Main Column "Expected Capitalisation". The capitalisation beyond FY 25-26 has been indicated in the subsequent sub column "After FY 25-26". Leave is craved for further explanation, on any specific scheme, as may be required, during the TVS.

(d) Reasons for time overrun and cost overrun (if any)

CSPGCL SUBMISSION: It is respectfully submitted that as and where applicable, the reasons have already included in the petition. Leave is craved for detailed explanation on each of such scheme during TVS.

For New Projects

(a) Detailed cost break –up of the scheme (including projected IDC if any) with justification of cost projected (Basis of cost projection, previous cost evaluated from similar scheme, Budgetary offer from vendor or discovered cost transparent bidding process)

CSPGCL SUBMISSION: It is submitted that in the instant petition, in accordance to the Hon'ble Commission's previous orders, no IDC claim has been submitted for low value and low gestation period "schemes". However, inspired by the query, CSPGCL humbly crave leave to submit scheme-wise IDC for all such schemes for the capitalisation upto/for FY 25-26, at the time of TVS.

Further, for the reasons submitted in the petition, the projection of IDC in case of FGD is not opportune at his juncture. It is submitted that under such scenario IDC will have to be dealt before determination of the supplementary tariff.

Regarding cost break up, mostly the prices are discovered through transparent bidding process and only such actual prices are considered at the time of true up, which in turn is based on audited accounts. As settled in the previous orders, in line with the spirit of the Act, such derived costs are considered as prudent costs. Leave is craved for scheme wise applicable details at the time of TVS.

(b) Status of approval of Board/Competent Authority and statutory authorities for proposed capex.

CSPGCL SUBMISSION: It is submitted that the petition as a whole has been approved by the BoD. Copy of the resolution is submitted as Annexure-2.

(c) Tariff Impact per year for the capitalization proposed:

CSPGCL SUBMISSION: The same has been factored in the Tariff petition, filed separately. Leave is craved to refer to the same and further explanation, as may be required at the time of TVS.

(d) Cost benefit analysis (in terms of quantified benefit over its lifetime w.r.t. cost incurred now)

CSPGCL SUBMISSION: Most respectfully kind reference is invited to the regulation 7.2 (b) (ii) of CSERC MYT Regulation 2021.

"For renovation and modernization schemes of power plants and all schemes meant for efficiency gain of power plants which have completed useful life, the generating company shall submit a petition containing duly approved cost benefit analysis and expected performance targets along with RLA study report;"

From the bare reading, it is evident that the cost benefit analysis is applicable only in such cases which are meant for efficiency gain of power plants. CSPGCL humbly submits that specific reasons have been submitted against each scheme in the petition. From the same it may please be noted that in the instant petition no scheme has been proposed in this category.

(e) Least cost analysis (Alternative considered before attempting the capital Investment) (specially required for CIP for Head office at Naya Raipur, including proposed treatment of existing offices)

CSPGCL SUBMISSION: It is submitted that over the time as per requirement for better use of technology and consolidation of process, additional office space requirement is being felt. Further, the GoCG direction dated 04th April 2014, forwarded vide letter dated 21st April 2014 (copy submitted as Annexure – 3) strictly directs all government / government owned organizations that all state level new buildings are to be constructed at Naya Raipur only. It is submitted that as per settled regulatory principles, an act of Government qualifies as Change in Law. The referred direction very well qualifies under the same.

Regarding alternatives, it is submitted that it is for the achievement of least cost only that the work has not been assigned by the state power companies to any organizations (central / State) on nomination basis and rather competitive bidding route has been preferred.

Lastly, regarding proposed treatment of existing office building, it is submitted that the issue has been marked for thorough deliberation. The new building is expected to take about three years' time and an appropriate decision in the matter, will be taken before transfer of offices to the new building (and consequent capitalisation). Looking to the involvement of all three companies and various crucial aspects associated with such decision, it may kindly be appreciated that it would be bit premature and imprudent for CSPGCL to delve upon chances & probabilities, at this stage.

At this stage it is submitted that no capitalisation against the proposal has been considered during FY 25-26. As submitted at para 74 of the petition, the scheme is submitted for in-principle approval only. Looking to the nature i.e compliance of State Government strict direction, which in turn qualifies as "change in law", approval is prayed.

(f) Copies of correspondence with external agencies/statutory authorities, based on which the capex has been proposed, for eg: Railways letter regarding 60 Kg rail,

<u>**CSPGCL SUBMISSION**</u>: Regarding replacement of rail line at DSPM TPS it is submitted that in a joint inspection, Railways suggested CSPGCL to replace some track points and replacement of track by 60 kg rails. Further the issue has already been deliberated in the previous order. The relevant part is reproduced herewith for ready reference:-

" 19. ……… …the Commission accords in-principle approval for replacement of 52 kg rail by 60 kg rail of railway tracks through railway approved consultants at an estimated cost of about Rs 25.70 Cr. The directions related to the schemes considered for in–principle approval as stipulated in the order shall apply."

(- page 8, order dated 15.03.2024 on petition no 84 of 2023)

(g) Reasons for including certain scheme in CIP of FY 2025-26 when capex and capitalization against these scheme is nil in FY 2025-26 for EG: Sl. 6 of Annexure II, Sl. 11 of Annexure III, Sl. 7 of Annexure IV etc.

<u>**CSPGCL SUBMISSION**</u>: It may be appreciated that time span for capital works (from concept to commissioning) mostly is more than a year. It is also submitted that the Tariff policy advocates for multiyear tariff framework. For more than a decade (except for force majeure period of pandemic), Hon'ble Commission has also followed multiyear tariff framework. In the instant case also, the Hon'ble Commission had floated the draft MYT Regulation for 5-year period from 01/4/2025 to 31/03/2030. However, somehow the same could not be finalized and as a stop gap arrangement Hon'ble Commission directed for filing of petition for one year. In the above background, CSPGCL submits that even if a scheme does not involve any capex or capitalisation but has achieved a conceptual finalization and is submitted

before the Commission for consideration in CIP, the same need to be appreciated. It is important to submit that unlike routine working of power companies, wherein based on the need proposals are moved in the line of action during any time of the year, there is very limited window for the regulated entities to file the petition and as such filing of scheme at the first available opportunity is not only just and prudent but is in-line with the pith and substance of the regulatory process too.

Further, regarding the specific citations, it is submitted that the first citation seems to suffer from some inadvertent typo error. Regarding the balance two, as submitted in the petition that they have been executed with due intimation to the Hon'ble Commission in accordance to the Regulation 7.6 of the CSERC MYT Regulation and inclusion in the instant petition is also in compliance of the same. Leave is craved for offering further explanation on such schemes, if required, during the TVS.

(h) As regards Sl. 20 of Annexure II, CSPGCL should submit when the requirement under Factory Act came into force.

CSPGCL SUBMISSION: In the above context, it is submitted that the Regulation 19.2 (iii) allow additional capitalisation not only in case of Change in law but for Compliance of Law. Further, it is submitted that as per the settled legal preposition, a direction by the enforcement agencies on the means qualifies for consideration. Under the provisions of Factory Act 1948, Government of MP notified Factories Rule 1962 (applicable in the State of Chhattisgarh too). Clause 131-A inserted vide notification no 49(a) 4-91-16 B dated 06.04.1995 provides for setting up an Occupational health center at all factory campuses carrying on Hazardous processes. The sub section (c) of the said rule states that for factories employing above 200 workers among other requirements there shall be one full time factory medical officer for up to 500 workers and one more medical officer for every 1000 workers or part thereof. It also includes specification for floor area etc. At DSPM TPS, the OHC is under the Additional Chief Medical Officer posted at the power station. The OHC operates in the old security building however that building is quite old (about more than 50 year old) and is in dilapidated condition hence the ACMO who is in charge of the OHC has raised demand for new building so that the center may be properly equipped with required medical equipment to comply the norms for industrial health and safety. Relevant part of the rule and the demand raised by ACMO is submitted as Annexure 4. Accordingly, prayer has been made under Regulation 19.2 (iii).

CSPGCL SUBMISSION:

(i) As regards Sl. 9 of Annexure-III, CSPGCL should submit the replacement cost of earlier 3 ICTs and when they were replaced

CSPGCL SUBMISSION: All the ICTs were installed at the time of commissioning of the plant. Further, in accordance to Hon'ble APTEL order, Hon'ble Commission has allowed full depreciation against all assets created upto 2010 (i.e Assets which have completed useful life). As such, since 2010, theses ICTS stand fully depreciated. Further, as original cost of the ICTs is not available, de-capitalization shall be considered in accordance to well settled "assumed deletion" method.

Regarding replacements, it is submitted that first was replaced in 2019, the second in April 2024 and third is expected to be replaced by the end of current FY.

(j) As regards Sl. 13 of Annexure III, CSPGCL should submit the scrap value of the old Fire tenders

CSPGCL SUBMISSION: As submitted in case of the ICTs, fire tenders are also fully depreciated. The de-capitalization shall be considered in accordance to the well settled assumed deletion method.

(k) As regards Sl. 14 of Annexure IV, CSPGCL Should clarify the plan to sell the bricks made in the brick plant

CSPGCL SUBMISSION: It is submitted that the scheme is proposed in compliance of law, the law requires establishment of brick plant. The issue of difficulty in selling the bricks has already been emphasized to CECB but CECB which is a statutory authority, insist for establishment of brick plant. It has even imposed the same in the conditions for "Consent to Operate". It may please be appreciated that CSPGCL as a responsible corporate citizen is on a completely different footing, it is required to comply the law, as it stands. It is bound by the famous Greek maxim *"Dura lex sed lex"* (law is tough but law is law). Further, if any relaxation is granted by CECB then appropriate action shall be taken after keeping all factors in view.

Regarding selling the bricks it is submitted that sale of bricks takes place as per the then prevailing market conditions. Long term sale agreement for a commodity like brick is unheard off. Therefore, it is premature to finalize plans for sale of bricks at this point of time. At the same time, it does not imply that there are no plans at all. As a contingency plan, it is being considered that to the extent possible, the initial brick production may be utilized in the construction activities related to FGD installation, new project work and the other civil works undertaken by CSPGCL.

4. CSPGCL has stated that it will fund all the capital Expense without any debt. CSPGCL should provide details regarding how it shall meet the necessary funding requirement by its internal accruals.

<u>CSPGCL SUBMISSION</u>: With due respect it is submitted that the basic presumption that CSPGCL will fund all capital expenses without any debt seems to be misplaced on three counts :-

(i) Kind reference is invited to para 6 of the petition *"Unless otherwise specifically mentioned, the debt equity structure has been considered 70:30 on normative basis and the cost indicated is without PV & IDC."*. Further, regarding the specific reference, kind attention is invited to para 25/ 34/44 & 51 of the petition, all of which state "*Financing of all the above proposed scheme is expected to be through normative Debt equity and the cost indicated for each of the scheme is without PV & IDC*".

(ii) It is further humbly clarified that even if no debt has been tied up, for regulatory purpose, the equity shall be limited to normative capping with balance being treated as regulatory/normative loan.

(iii) Still further, it is also humbly clarified that even if it is mentioned that no debt has been tied up it does not imply that CSPGCL has relinquished its right to draw loan against that scheme. It is submitted that if a utility opts for drawl of debt at a later stage, it is beneficial to end consumer hence regulatory philosophy / principles / practices / allow any utility to opt for loan at any stage.

Before parting with for still better clarity, on conceptual ground it is further submitted :

i) Previously too, it is only low value low gestation schemes for which no debt was proposed. The big ticket scheme like new projects / FGD / Mine are normally tied at lower than ceiling equity. Taking a comprehensive view, it may please be seen that the overall equity in the overall capex is normally even lower than the normative 30%.

ii) Secondly, it may please be noted need to be realized that CSPGCL has an internal source of funding by way of ROE. It may be seen that the capex being undertaken during the year is commensurate to the same.

iii) Last but not the least, the mode of equity mobilization is an internal decision of the utility. It is also submitted that in past more than a decade, except for few large cap specific schemes, all schemes have been funded in the same manner as proposed in the instant petition. If there will be any deviation in due course, the same shall be submitted at the time of true up.

CIP of GP-II coal Mine

5. CSPGCL has projected RS. 154.62 Crore Capital expense for private railway siding within mining lease area Rs. 91.87 Crore in Ghargoda –Pelma spur line (Railway line). In this regards, CSPGCL Should submit

(a) Justification for the project

<u>CSPGCL SUBMISSION</u>: Regarding the justification it is humbly submitted that excavation of coal at a captive mine serves no purpose unless it gets transported to the plant. For transportation of coal it is well settled universal preposition that bulk transportation by rail is more reliable and cheaper than truck transportation. The other options which may be cheaper are transportation of coal are the transportation by conveyor system and transportation by ship. Looking to distance and geography, both are simply infeasible. Therefore, CSPGCL has opted for the rail network. The scheme is part of the captive coal mine plan since beginning.

(b) Tariff Impact per year for the capitalization proposed:

<u>CSPGCL SUBMISSION</u>: Computation of tariff impact is not feasible at this point of time. However, it may suffice to note that over the time transportation by Rail has always proven to be cheaper than the transportation by Truck. However, to answer any apprehension and to substantiate the contention it is submitted that at present coal is transported to ABVTPS through Rail over road mode from two railway siding. The composite average transport cost in FY 23-24 was 1081.02, whereas the same plant received coal from SECL mines through rail only mode at the rate of Rs 266.04 /Ton. Even presuming double of that rate (due to longer distance) the cost differential seems to be about Rs 550/Ton. For annual total coal output of 45 lakh ton it implies annual cost differential of about Rs 247 Cr. Over a period of 20 years (without considering additional factors) the saving seems to be about 5000 Cr.

(c) Cost benefit Analysis (in term of quantified benefit over its lifetime w.r.t. cost incurred now)

<u>CSPGCL SUBMISSION</u>: The answer has already been covered.

(d) Least cost analysis (Alternatives considered and cost of each alternative)

<u>CSPGCL SUBMISSION</u>: The answer has already been covered.

6. Cost benefit analysis for all the new schemes proposed.

<u>CSPGCL SUBMISSION</u>: - Reply on similar issue at para 3 applies squarely.

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SUBMISSION OF ADDITIONAL INFORMATION

(W.r.t. letter no. P. No 99 of 2024/2382, Raipur, Date: 30/12/2024)

INDEX to ANNEXURES

Annexure-I (

Word and pdf file of CIP 25-26 (petition no. 99 of 2024)

E.D.(C&RA) CSPGCL

Wed 12/11/2024 1:22 PM

To:surendra_singh26@rediffmail.com <surendra_singh26@rediffmail.com>;

Cc:CSERC Sec <cserc.sec.cg@nic.in>;

2 attachments (2 MB)

CIP 25-26 final.pdf; CIP Petition _Submitted to BOD_R1.docx;

please find the attached file as required.

O/o ED(C&RA)
CSPGCL, Raipur

Annexure - II

(2)

चो एस पी जी सी एल
CSPGCL

CHHATISGARH STATE POWER GENERATION CO. LTD.

(A Govt. of Chhattisgarh Undertaking)

CIN: U40108CT2003SGC015821

EXTRACT OF MINUTES OF 135th MEETING OF THE BOARD OF DIRECTORS OF CHHATTISGARH STATE POWER GENERATION COMPANY LIMITED HELD ON FRIDAY, 29th NOVEMBER, 2024 AT 03:00 PM AT 03RD FLOOR, VIDYUT SEWA BHAWAN, DANGANIA, RAIPUR (C.G.) 492001

AGENDA NO. 135/18

APPROVAL OF THE CSPGCL PETITION FOR CAPITAL INVESTMENT PLAN FOR FY 2025-26

"**RESOLVED THAT** approval is hereby accorded for filing of petition before CSERC for approval of Capital Investment Plan of CSPGCL for FY 25-26.

RESOLVED FURTHER THAT, E.D./C.E. (C&RA) in consultation with E.D./G.M. (FIN) or/& E.D./C.E. (O&M: Gen) is empowered to make all additional submissions related to aforesaid petition filed before CSERC."

For, CHHATTISGARH STATE POWER GENERATION COMPANY LIMITED

29/11

Company Secretary
CSPGCL

Regd. Office: "Vidyut Sewa Bhawan" Dangania, Raipur (C.G.)
Tele: 0771-2574408, Fax: 0771-2574035,
E-Mail: mdgenco@cspc.co.in, hr.cspgcl@cspc.co.in, Website: www.cspc.co.in/cspgcl

Annexure III (3)

(2)

MD
CSPGCL
GEN. LETTER
R/D 321
DT-22-4-14

छत्तीसगढ़ शासन
ऊर्जा विभाग
मंत्रालय
महानदी भवन, नया रायपुर

O/o CE (HR)
C.S.P.G.C.L., RAIPUR
Rect. No. 540
Date 23-4-14

क्रमांक 817/611/2014/13/1, नया रायपुर, दिनांक 21/04/2014

प्रति,

1— सचिव
छ0ग0 राज्य विद्युत नियामक आयोग,
विद्युत नियामक आयोग भवन, सिंचाई कालोनी,
रायपुर (छ0ग0)

2— अधीक्षण अभियंता (वि.सु.) एवं
मुख्य विद्युत निरीक्षक, छ.ग.,
मुख्यालय, नया रायपुर (छ0ग0)

3— प्रबंध संचालक
छ.ग. राज्य विद्युत वितरण/होल्डिंग/पारेषण/ट्रेडिंग/उत्पादन क0 मर्या0,
विद्युत सेवा भवन, डंगनिया,
रायपुर (छ0ग0)

4— निदेशक
छ0ग0 राज्य अक्षय ऊर्जा विकास अभिकरण (क्रेडा),
विद्युत नियामक भवन, सिंचाई कालोनी,
रायपुर (छ0ग0)

विषय:— रायपुर में संचालित विभागाध्यक्ष कार्यालय निगम/मंडल/आयोग आदि के भवनों के संबंध में।

S(HR)

—:00:—

विषयांतर्गत मुख्य सचिव, छ0ग0 शासन, सामान्य प्रशासन विभाग, मंत्रालय, नया रायपुर से जारी पत्र क्रमांक एफ 10—12/2014/1/एक, दिनांक 04.04.2014 की छायाप्रति संलग्न प्रेषित है।

अतः पत्र में दिये गये निर्देशों का कड़ाई से पालन किया जाना सुनिश्चित करें।

संलग्नः— उपरोक्तानुसार,

T. R. Bhatprahri
(टी0आर0 भतप्रहरी)
अनुभाग अधिकारी
ऊर्जा विभाग, मंत्रालय,
नया रायपुर (छ0ग0)

A G M
DGM-I
DGM-II
DGM-III

manaynji | ARV (5)

25/4/14

Tamboli/Letter- 349

25/04/14

26/4/14

(4)

EDAIK-511-ESTB-13-2014

छत्तीसगढ़ शासन
सामान्य प्रशासन विभाग
::मंत्रालय::
महानदी भवन, नया रायपुर-492002

पंजी क्रमांक 611 / 2014/13/1
ऊर्जा विभाग (स्थापना शाखा)
दिनांक 10 .... 4. 2014

क्रमांक एफ 10-12/2014/1/एक
रायपुर, दिनांक 04 अप्रैल, 2014

प्रति

समस्त अपर मुख्य सचिव/
प्रमुख सचिव/सचिव,
छत्तीसगढ़ शासन,
मंत्रालय, नया रायपुर ।

श्री तंबोली
10.4.14

विषय:- रायपुर में संचालित विभागाध्यक्ष कार्यालय निगम/मंडल/आयोग आदि के भवनों के संबंध में ।

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आप भली-भांति अवगत है कि, रायपुर स्थित संभाग/जिला स्तरीय कार्यालयों को छोड़कर, शेष सभी कार्यालय नया रायपुर में स्थानांतरित होना है।

2/ इसी अनुक्रम में कतिपय विभागाध्यक्ष कार्यालयों को नया रायपुर में स्थानांतरित किया जा चुका है। कुछ कार्यालय और शेष है, इन्हें भी विभागाध्यक्ष कार्यालय भवन का आंतरिक साज-सज्जा का कार्य पूर्ण होने पर नया रायपुर में स्थानांतरित किया जा रहा है। कुछ निगम/मंडल/बोर्ड/प्राधिकरण/आयोग के प्रशासनिक भवन नया रायपुर में निर्माणाधीन हैं। जिनके प्रस्ताव थे, उन्हें नया रायपुर डेव्हलपमेंट अथॉरिटी द्वारा भूमि का आवंटन भी किया जा चुका है। ऐसे कार्यालयों के प्रशासनिक भवनों का निर्माण भी शीघ्र हो जावेगा।

3/ शासन ने निर्णय लिया है कि विभागाध्यक्ष कार्यालयों/निगम/मंडल/बोर्ड/प्राधिकरण/आयोग एवं संस्थाओं के जो भी कार्यालय रायपुर में वर्तमान भवनों में संचालित है, उनमें किसी भी प्रकार का नया निर्माण कार्य अब नहीं कराया जाये तथा उन पर अनावश्यक शासकीय धन राशि का व्यय न किया जाए। राज्य स्तरीय किसी भी कार्यालय का नवीन भवन पुराने रायपुर में अब निर्मित नहीं किया जाए। कृपया इन आदेशों का कड़ाई से पालन करें।

(विवेक ढांड)
मुख्य सचिव,

पृष्ठां. क्रमांक एफ 10-12/2014/1/एक
रायपुर, दिनांक 04 अप्रैल, 2014

प्रतिलिपि:-

1. समस्त विभागाध्यक्ष कार्यालय, रायपुर, (छ.ग.)
2. प्रबंध संचालक/सचिव, समस्त आयोग/निगम/मंडल/प्राधिकरण, रायपुर, (छ.ग.)

की ओर पालनार्थ अग्रेषित ।

(जी.आर.चुरेन्द्र)
उप सचिव,
छत्तीसगढ़ शासन,
सामान्य प्रशासन विभाग

05 APR 2014

5

Section 131A in The M.P. Factories Rules, 1962

131A. Occupational Health Centre.

(1). In respect of any factory carrying on 'hazardous process' there shall be provided and maintained in good order an Occupational Health Centre with the Services and facilities as per scale laid down hereunder :-

(a). For factories employing upto 50 workers. - (i) The services of a Factory Medical Officer on retainership basis, in his clinic to be notified by the occupier. He will carry out the pre-employment and periodical medical examinations stipulated in Rule 131 and render medical assistance during any emergency;

(ii) a minimum of 5 persons trained in first-aid procedures amongst 'whom atleast one shall always be available during the working period;

(iii) a fully equipped fist-aid box.

(b). For factories employing 51 to 200 workers. - (i) An Occupational Health Centre having a room with a minimum floor area of 15 sq. m. with floors and wall made of smooth and impervious surface and within adequate illumination and ventilation as well as equipments as per the schedule annexed to this rule;

(ii) a part-time Factory Medical Officer shall be in over all charge of the Centre who shall visit the factory atleast twice in a week and whose services shall be readily available during medical emergencies;

(iii) one qualified and trained dresser-cum-compounder on duty throughout the working period;

(iv) a fully equipped first aid box in all the department.

(c). For factories employing above 200 workers. - (i) one full-time Factory Medical Officer for factories employing upto 500 workers and one more medical officer for every additional 1000 workers or part thereof;

(ii) an Occupational Health Centre having atleast 2 rooms each with a minimum floor area of 15 sq. m. with floors and walls made of smooth and impervious surface and adequate illuminations and ventilation as well as equipment as per the schedule annexed to this rule;

(iii) there shall be one nurse, one dresser-cum-compounder and one sweeper-cum-ward boy throughout the working period;

(iv) the Occupational Health Centre shall be suitably equipped to manage medical emergencies.

(2). The Factory Medical Officer required to be appointed under sub-rule (1) shall have qualifications included in Schedules to the Indian Medical Degrees Act, 1916 or in the Schedules to the Indian Medical Council Act, 1956 and possess a Certificate of Training in Industrial Health of minimum three months duration recognised by the State Government :

Provided that :-

(a). a person possessing a Diploma in Industrial Health or equivalent shall not be required to possess the certificate of training as aforesaid;

(b). the Chief Inspector may, subject to such conditions as he may specify, grant exemption from the requirement of this sub-rule, if in his opinion a suitable person possessing the necessary qualification is not available for appointment;

(c). in case of a person who has been working as a Factory Medical Officer for a period of not subject to the condition that the said person shall obtain the aforesaid certificate of training within a period of three years, relax the qualification.

(3). The syllabus of the course leading to the above certificate, and the organisations conducting the State course shall be approved by the DGFASLI or the State Government in accordance with the guidelines issued by the DGFASLI.

(4). Within one month of the appointment of a Factory Medical Officer, the occupier of the Factory shall furnish to the Chief Inspector the following particulars :-

(a). Name and address of the Factory Medical Officer;

(b). Qualifications;

(c). Experience, if any; and

(d). the sub-rule under which appointment given.

CHHATTISGARH STATE POWER GENERATION COMPANY LIMITED

(A SUCCESSOR COMPANY OF CSEB)
(A C.G. GOVT. UNDEATEKING)

O/o THE ADDL. CHIEF MEDICAL OFFICER

MAIN HOSPITAL, CSPGCL, KORBA EAST.

No. AOMO/HOSP/DSPM/611

Korba East 10.08.2023

To,

The Superintending Engineer(Civil)
DSPM TPS KEB.

Sub:- Construction of OHC building as per norms.

Through proper channel by Chief Engineer Generation DSPM TPS Korba East.

This is to bring to you kind notice that OHC is statutory and mandatory requirement for hazardous plant having staff more then 200. An Occupational Health Center running 24*7 with all equipment is essential. Present OHC building of DSPM TPS not as per norm lay down by factory act 1948. Therefore it is submitted that a new OHC building has to be constructed as per norm beside the old existing OHC building. Maps & Parameters is depicted as enclosed.

Addl. Chief Medical Officer
Main Hospital DSPM
Korba East.

Addl. C.M.O.,
Main Hospital DSPM
CSPGCL, KORBA (East)

सी एस पी जी सी एल
CSPGCL

CHHATTISGARH STATE POWER GENERATION COMPANY LIMITED
(A Govt. of C.G. Undertaking)

NO. 03-09/CIP petition/92 Raipur. Dtd 06/02/25

To,

The Secretary,
Chhattisgarh State Electricity Regulatory Commission
New Shanti Nagar, Raipur.

Sub: Additional submission in respect of Petition no. 99 of 2024.

Ref: CSERC's letter no. P No. 99 of 2024/141 dtd 29.01.2025.

Respected Sir,

Hon'ble Commission, vide captioned letter has desired some additional information in respect of Petition no 99 of 2024. As desired CSPGCL humbly makes additional submission in respect of the subject petition for kind consideration please.

Encl: As above.

06/02/25.

CHIEF ENGINEER (C&RA)
CSPGCL, Raipur

Office of the Executive Director (C&RA),
Shed No. 06, Vidyut Sewa Bhawan Complex, Dangania, Raipur– Pin 492013; CIN No. U40108CT2003SGC015821
Phone : 0771-2574907; Fax : 0771-2574806; mail : ce.cncp@gmail.com; web site : www.cseb.gov.in
AN ISO 9001:2008 COMPANY

(1)

SUBMISSION OF ADDITIONAL INFORMATION

(W.r.t. letter no. P. No. 99 of 2024/141, Raipur, Date: 29/01/2025)

1. CSPGCL has prayed for replacement of old Fire Tenders in KWTPP in S. No. 13 of Annexure II of the CIP Petition. CSPGCL should clarify if there is any defect/problem.

   CSPGCL SUBMISSION: - It is submitted that Korba West Complex is a big complex which has the old four units of 210 MW capacity and the next one unit of 500 MW capacity. Some of the facilities like LDCC, Oil tanks etc. are common to both the plants. Administratively, the complex includes the HPS Bango and the Mini Hydro plant too. Looking to the vast area and the criticality of the systems, minimum three fire tenders are required at Korba West complex and one at HPS Bango.

   As such the instant submission is applicable for the proposal at SN 13 of Annexure III as well as SN 6 of Annexure V. (Total 3 No Fire Tenders)

   At present there are total four fire tenders in service. However, two of them (Registration no CG12ZL04184 and CG12ZL04185) are 1985 make, one (Registration no CG12F9198) is 2008 make and the one (Registration no CG12R6075) is 2012 make. Two are very old and three of the vehicles have already been fully depreciated (As per Hon'ble APTEL order, all assets of HTPS as on 31st March 2010 stand fully depreciated). It may be appreciated that maintaining such old fire tenders is very challenging and CSPGCL pleading for replacement of these fire tenders is very just and reasonable.

   Most importantly, the replacement of these fire tenders is a must in accordance to the law also. The Ministry of Road Transport and Highways, Government of India on 16th January 2023 has notified Central Motor Vehicles (First Amendment) Rules, 2023 (Copy Annexed as A-1) which mandates that Renewal of certificate of registration of Government vehicles including the vehicles owned by a Public sector undertaking; shall expire on completion of 15 years of service. As such, as on this date, only one of the fire tender can continue to be in service. **Thus the prayer of CSPGCL squarely qualifies under Regulation 19.2 (iii) Change in law / Compliance of Law.**

   In this regard, it is also submitted that looking to the exigency and the Change in Legal provisions, CSPGCL has already placed order (after open transparent bidding) for procurement of one crash tender at the cost of about Rs 1.53 Cr, which is expected to be received and capitalized in FY 25-26.

2

2. As regards the Query 3 (k) of the Preliminary Data Gaps, CSPGCL has proposed construction of Brick manufacturing units in some of the plants. In this regard:-

a) CSPGCL should provide the reason for variation in estimated cost of these schemes.

CSPGCL SUBMISSION: - As already submitted in the CIP petition installation of Brick manufacturing plant is a mandate by Chhattisgarh Environment Conservation Board (CECB). It is further submitted that CECB not only mandates installation of the brick plant but it also specifies the plant capacity for each of the Thermal Power Station. The capacity of plant mentioned in the CIP petition is as per conditions in Consent to Operate (CTO) issued by CECB for each of the TPP. Naturally, with the variation in the capacity of the brick plant the cost estimate also varies. However, in the instant case, in the interest of transparency it is important to submit that unlike the general perception of linear relation between the cost and the capacity, the cost of the brick plant changes significantly beyond a threshold capacity level. In this regard it is submitted that such shift in cost paradigm is due to the change in technology beyond a particular threshold level. As per the information gathered from discussions with the experts in the field i.e. the vendors and also the NTPC professionals, the maximum capacity of the brick plants based on conventional domestic technology is about 1,30,000 bricks per day. As per the information gathered beyond such capacity, the plants based on imported technology are to be installed. It may please be appreciated that with change in technology, cost correlation also gets changed.

It is in the above background that the capacity and cost of brick manufacturing units to be installed at different Power Stations has been considered differently in the petition. Further it may be appreciated that the installation of the brick manufacturing plant will be a first time exercise for CSPGCL and as such at this stage CSPGCL is constrained to consider and submit the estimates as received in the budgetary offer.

However, as the cost estimate for the brick plant change significantly with the technology involved and CECB directions do not insist on use of any particular technology, CSPGCL plans to remain open to any of the technology in its open and transparent bidding process so that if any manufacturer has cheaper technology to suite the requirement stipulated by CECB in an efficient and reliable manner at an economical cost then the same may be considered

b) Is the cost based on cost discovered through Transparent bidding?

(3)

<u>CSPGCL SUBMISSION</u>: - As submitted above, the cost estimate submitted in the petition is based on the budgetary offer from a reputed firm in the field. However, in accordance to the pith and spirit of the Act, Rules and Regulations, being a responsible corporate citizen, CSPGCL shall place the order only through open and transparent e-bidding process.

c) Who shall operate these plants?

<u>CSPGCL SUBMISSION</u>: - As submitted earlier, CSPGCL has not installed any brick manufacturing plant till date. Therefore, there is no readily available expertise in the field. The typical situation throws all the available options open before CSPGCL. It is further submitted that with all the options open, the decision to opt for in-house operation or operation on wet/dry lease rental basis or contract basis shall depend upon the market dynamics, the availability of vendors, the experience of other TPPs at the time of commissioning of the brick plants. CSPGCL respectfully submits that any decision at this point of time may be bit premature and may not be in the best interest of all the stake holders including but not limited to the end beneficiary. As such, in the wider interest, leave is humbly craved for allowing a decision in this regard before commissioning of the brick plants.

Before parting with, CSPGCL humbly clarify an important aspect. The installation of brick plant is proposed in compliance of CECB directions. However, if in future CECB drops the conditionality (before award of contract) and there is no such direction from any other authority too, then CSPGCL has no plan to proceed with the installation of brick plant.

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26/02/25

Annexure-I

4

MINISTRY OF ROAD TRANSPORT AND HIGHWAYS

NOTIFICATION

New Delhi, the 16th January, 2023

G.S.R. 29(E).—Whereas draft rules further to amend the Central Motor Vehicles Rules, 1989, were published, as required under sub-section (1) of section 212 of the Motor Vehicles Act, 1988 (59 of 1988), *vide* notification of the Government of India in the Ministry of Road Transport and Highways number G.S.R. 845 (E), dated the 24th November, 2022 in the Gazette of India, Extraordinary, Part-II, Section 3, Sub-section (i) inviting objections and suggestions from all persons likely to be affected thereby before the expiry of the period of thirty days from the date on which copies of the Official Gazette containing the said notification were made available to public;

And whereas copies of the said Official Gazette in which the said notification was published, were made available to the public on the 25th November, 2022;

And whereas the objections and suggestions received from the public in respect of the said draft rules have been duly considered by the Central Government;

Now, therefore, in exercise of the powers conferred by sub-sections (1) and (4) of section 59 and clause (p) of section 64 of the Motor Vehicles Act, 1988 (59 of 1988), the Central Government hereby makes the following rule further to amend the Central Motor Vehicles Rules, 1989 namely: -

1. (1) These rules may be called the Central Motor Vehicles (First Amendment) Rules, 2023.

   (2) They shall come into force on the 1st day of April, 2023.

2. In the Central Motor Vehicles Rules, 1989, after rule 52, the following rule shall be inserted, namely: -

   "52A. Renewal of certificate of registration of Government vehicles. – (1) Notwithstanding anything contained in rule 52, the certificate of registration in respect of a motor vehicle owned by -

   (i) the Central Government; or

   (ii) the State Government or Union Territory administrations; or

   (iii) any Municipal Corporation or Municipality or Panchayat; or

   (iv) a State transport undertaking established under the Road Transport Corporation Act, 1950 (64 of 1950) and the Companies Act, 2013 (18 of 2013); or

   (v) a Public sector undertaking; or

   (vi) an autonomous body owned or controlled by the Central Government or the State Government,

shall expire after the lapse of fifteen years, as provided in sub-section (7) of section 41, from the date of initial registration of the vehicle:

Provided that the certificate of registration of government vehicle if already renewed before lapse of fifteen years from the date of initial registration, such certificate shall be treated as cancelled on completion of fifteen years from the date of initial registration of the vehicle:

Provided further that, this rule shall not apply to the special purpose vehicles (armoured and other specialised vehicles) used for operational purposes for defense of the country and for the maintenance of law and order and internal security.

(2) Disposal of such vehicles shall, after the expiry of the fifteen years from the date of initial registration of the vehicle, be ensured through the Registered Vehicle Scrapping Facility set up in accordance with the Motor Vehicles (Registration and Functions of Vehicle Scrapping Facility) Rules, 2021, as amended from time to time."

[F. No. RT-23013/1/2021-T]

MAHMOOD AHMED, Addl. Secy.

Note: The principal rules were published in the Gazette of India, Extraordinary, Part II, Section 3, Sub-section (i) *vide* notification number G.S.R. 590(E), dated the 2nd June 1989 and last amended *vide* notification number G.S.R. 901(E), dated 22nd December, 2022.

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