

Date: 12.10.2022

To,

The Secretary,
Chhattisgarh Electricity Regulatory Commission
Irrigation Colony, Shanti Nagar, Raipur (C.G.)

Subject: Views / suggestions regarding proposed parameters and principles for computation of generation tariff of RCPP and DCP.

Sir,

The Hon'ble APTEL in its Judgement dated 06.05.2022 passed in Appeal No.72 of 2016 and 100 of 2016, has directed Hon'ble Commission for determination of generation tariff of Raigarh Captive Power Plant (RCPP) and Dongamahua Captive Power Plant (DCP). Accordingly, the Hon'ble Commission decided to initiate suo-motu proceeding to determine the generation cost of DCP & RCPP and registered the cases as Petition No. 60 of 2022 & Petition No. 61 of 2022 respectively. Further, the Hon'ble Commission vide a notice has invited objections / suggestions regarding proposed parameters and principles for computation of generation tariff of RCPP and DCP.

It is submitted that, there was no surplus power available from RCPP suitable for supply to distribution consumers and entire power was used for fulfilling captive requirement, therefore, determination of generating cost is not necessary for RCPP.

It may be noted that the segregated accounts of DCP are not audited separately. However, in case the Hon'ble Commission requires any specific supporting document for substantiating submissions made below, the same may be provided. The submissions regarding the proposed parameters and principles for computation of generation tariff of DCP are as follows:

1. The actual GFA addition during FY 2016-17 to FY 2018-19 are as follows:

Rs. Crore			
Particulars	FY 2016-17	FY 2017-18	FY 2018-19
Opening GFA	2148.65	2,149.24	2,151.89
Addition during the year	0.59	2.65	3.18
Closing GFA	2,149.24	2,151.89	2,155.07

The details of the asset added during the year is provided below:

Rs. Crore

Sl.	Particulars	FY 2016-17	FY 2017-18	FY 2018-19
1	Leasehold Land	-	-	-
2	Buildings/Civil Works	0.32	1.60	1.19
3	Hydraulic Works	-	-	-
4	Roads & Others	-	-	-
5	Plant, Machinery & Equipments	0.12	0.46	1.56
6	Lines & Cable Networks	-	-	-
7	Furniture and Fixtures	-	0.07	-
8	Office Equipments	0.03	0.09	0.43
9	Vehicles	0.11	0.43	-
	TOTAL	0.59	2.65	3.18

2. The details of actual O&M expense for FY 2016-17 to FY 2018-19 are as follows:

Rs. Crore

Particulars	FY 2016-17	FY 2017-18	FY 2018-19
O&M Expense	178.37	232.67	312.16

3. The actual Non-Tariff Income for DCPD are as follows:

Rs. Crore

Particulars	FY 2016-17	FY 2017-18	FY 2018-19
Misc. Sales (Store Item, Scrap etc.)	4.39	2.64	1.50
Sundry/Misc Balance Wr. Back	0.00	-	0.66
Insurance Claims Receipts	-	0.50	1.10
Other Income	0.02	0.01	0.02
Total	4.41	3.16	3.27

4. It is submitted that the Dongamahua Power Plant is a Captive Power Plant whose load keeps on fluctuating across a wide range. The power generated is mainly used for production of steel and the captive status has also to be maintained. Therefore, the normative auxiliary consumption of 11.50% and Station Heat Rate of 2,450 kCal/kWh desirable for other generating stations (IPPs) are not suitable for DCPD. In view of the same, actual auxiliary consumption and Station Heat Rate as provided below may be considered.

Particulars	FY 2016-17	FY 2017-18	FY 2018-19
Auxiliary Consumption (%)	12.79%	14.62%	15.75%
Station Heat Rate (kCal/kWh)	2,521	2,497	2,503

5. The actual weighted average GCV of coal and price of coal are provided below

Particulars	FY 2016-17	FY 2017-18	FY 2018-19
GCV of Coal (kCal / kg)	2,403	2,818	2,742
Price of Coal (Rs./MT)	2,022	2,228	2,926

The supporting documents related to price and GCV of coal are attached on sample basis for the kind consideration of the Hon'ble Commission

The Hon'ble Commission is requested to consider the above submissions for determination of generation tariff for Dongamahua Captive Power Plant. If required, additional supporting documents shall be submitted as per direction of the Hon'ble Commission in the above subject matter.

Short-term Power Procurement for 21.07.2022 to 31.03.2023 through Competitive Bidding Process:

- It is submitted that due to the expiry of the short-term power procurement arrangement of JSPL-D with Jindal Power Limited ("JPL"), JSPL-D, as a prudent distribution licensee initiated a Request for participation on the Discovery of Efficient Electricity Price ("DEEP") portal under the "Guidelines for Short-term (i.e., for a period of more than one day to one year) Procurement of Power by Distribution Licensees through Tariff based bidding process" issued by the Ministry of Power, Government of India on 30.03.2016, and its amendments thereof.
- In the said bid, JPL emerged as a successful bidder by quoting the lowest tariff of Rs. 5.50/kWh, and accordingly, a Letter of Intent ("LoI") was issued by JSPL-D on 13.07.2022 to JPL, which was also accepted on the even date by JPL for the entire duration of 21.07.2022 to 31.03.2023 for Round the Clock ("RTC") power procurement of 150 MW.
- Accordingly, a Petition listed as 50 of 2022, was filed by JSPL-D under Section 63 of EA 2003 for adoption of Tariff for procurement of power under Short-term arrangement on DEEP portal selected through Competitive Bidding Process as per the Guidelines issued by Ministry of Power, Govt. of India on 30.03.2016 and its amendments thereof. The aforesaid Petition was disposed of by this Hon'ble

Commission, wherein, vide an order dated 21.07.2022, adopted the tariff determined under Section 63 of EA 2003.

In the judgment, Energy Watchdog vs. CERC & Ors., reported in (2017) 14 SCC 80, the Hon'ble Supreme Court has held that the tariff adopted under Section 63 is the tariff which is determined under competitive bidding. Hence, once tariff has been adopted under the said provision, the same means that it has been determined, and the said tariff has to be given effect to.

Further, the Hon'ble APTEL vide its Judgement dated 06.05.2022 in the matter of Appeal Nos. 72 and 100 of 2016 has directed the Hon'ble Commission to allow JSPL-D to procure required quantum of electricity through competitive bidding for long term use. JSPL-D is already in process conducting competitive bidding for long term power procurement. Supply from the successful bidder is expected to commence before the expiry of existing short-term power procurement agreement. The Hon'ble Commission has already been apprised of the proceedings in this matter through various letters and Petitions filed from time to time.

In view of the same, determination of generation cost for DCPD and RCPD for a period in which they have not supplied or planned to supply power shall be of no use. The Hon'ble Commission is humbly requested to kindly allow JSPL-D to continue use of power from JPL up to 31.03.2023 on short term basis and further avail supply from the long-term source discovered through competitive bidding and consider the price discovered for calculation of power purchase cost while determining Annual Revenue Requirement for the respective years.

Thanking you,

Yours faithfully,
For **Jindal Steel & Power Ltd.**

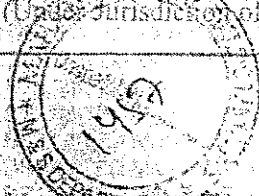


Pradeep Tandon
President



Mahanadi Coalfields Limited
(A Subsidiary of Coal India Limited)
A Mini Ratho Company

संबलपुर कोर्ट के अधिकार क्षेत्र के अधीन/
(Under Jurisdiction of Sambalpur Court)



महानदी कोलफील्ड्स लिमिटेड
MAHANADI COALFIELDS LIMITED
(कोल इण्डिया लिमिटेड की एक अनुसंगी कंपनी)
(A Subsidiary of Coal India Limited)

विक्रय एवं विपणन विभाग
Sales & Marketing Department
दूरभाष : 0663-2542870
फैक्स : 0663-2542307/2542770

पंजीकृत कार्यालय/Regd Office: बाकसपुर/Post: जगन्नाथ बिहार जगन्नाथ/Dist: संबलपुर/Sambalpur, पिन Pin-768020, ओडिशा/Odisha

सेवा में/To

मुख्य महाप्रबंधक/महाप्रबंधक C.G.M./G.M.

डी०ओ०स : D.O. No. /ARV. No. 0132998

जगन्नाथ, तालचर/भारतपुर/दिगुला/लिंगराज/कविदा/ईग मलि/ओरिवट/बसुंधरा/लखनपुर क्षेत्र
Jagannath/Talcher/Bharatpur/Digula/Lingaraj/Kavidah/Orivot/Basundhara/Lakhanpur Area

दिनांक : Date 26/10/2017

रोड डिलेवरी आर्डर/ROAD DELIVERY ORDER

महोदय/Sir

ग्राहक कोड/Customer Code 601977

कम्पनी मेसर्स/M/S

GSTIN: 22AAPEJ7097D120

SINHA STEEL AND POWER LIMITED

REARSI ROAD

RAIGARH

Chattisgarh

DESTN: OUTSIDE ODISHA

RAIGARH

Chattisgarh

का जीवे दिए गए विवरण एवं चिह्नले पृष्ठ पर दी गई निबन्धन तथा शर्तों के अनुसार कोयला दिया जाए।

Please be delivered coal as per details below and terms and conditions overleaf.

I) विवरण/Particulars

तक मान्य/Valid upto 29-DEC-17

(क) महिना/Month

OCT, 2017

(ख) टाईप ऑफ रीलीज एवं प्राथमिकता/Type of Release & priority

SPOT & AUCTION

Date: 21-OCT-17

(ग) परीमाण/Quantity

25000.00 Tonnes Twenty-five Thousand

(घ) ग्रेड एवं आकार/Grade and Size

60% 50-55-57-60

(-)+100 MM

(ङ) कहाँ से (स्रोत)/Source

KULDA OCP

II) भुगतान का विवरण/Payment of Details

प्रभार का विवरण/Charge Details

SE AMOUNT RECEIVED FROM SERVICE PROVIDER

MJ

= 5000000.00

Draft No.	Date	Bank	Amount (Rs.)	Charge Type	Rate (Rs/te)	Total Charge (Rs.)
-----------	------	------	--------------	-------------	--------------	--------------------

4506	23/10/17	STATE BANK OF INDIA	103759220.00			
------	----------	---------------------	--------------	--	--	--

WALCOALFIELD LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

MAHANADI COALFIELDS LIMITED MAHANADI

Bid Rate	3102.00	77550000.00
Spa. Royalty	434.28	10857000.00
Sizing	87.00	2175000.00
NET FUND (2%)	6.69	217140.00
DMF FUND (30%)	130.28	3257100.00
IGST (15%)	188.11	4702812.00
GST Comp. Cess	490.00	10990000.00

Rupees Ten Crore Thirty-Seven Lakh Fifty-Nine Thousand Two Hundred Twenty Only

Total Amount (Rs.): 108359052.00

Money Receipt No. 0092866 dated 26-OCT-17

Rs. 168.00 to be refunded.

पार्टी/प्रतिनिधि का हस्ताक्षर/Signature
Sign of Party/Representative 26/10/17

द्वारा जाँच किया गया/Checked by 26/10/17

प्रभारी अधिकारी/Officer-in-Charge

ग्राहक की प्रति/
Customer Copy

Asst. Manager
Marketing & Sales Department
M.C.L.H.Q. BURLA

परियोजना का अग्रेसरित करने के लिए क्षेत्र में जमा करने तथा प्रति को परियोजना में रखने हेतु
(For depositing at Area for forwarding to the project and project to retain this copy)

4521007835



(बिलासपुर ग्यालालय के क्षेत्राधिकार)
साउथ ईस्टर्न कोलफील्ड्स लिमिटेड
(कोल इंडिया का एक सहायक संस्थान)
पश्चिम ओ. - पीपल रोड बिलासपुर - 495 006
कार्यालय (मिनी एंड विपणन) बिलासपुर
DELIVERY ORDER

CONSUMER

LOADING THROUGH

INKER/TELEX

Auction Ref. 141th-EAUCTION-MSTC/293/

For Lifting/Loading of coal no payment required

Delivery Order No:012017/5319/98711

D.O. Date: 24/01/17

Customer Classification Group : SUCCESSFULBIDDER

Party Name:- Jindal Steel And Power Limited

Party Address:- Kharsia Road Raigarh Raigarh C.G.

D.O. Issue Date:

Pan No: AAACJ7097D

Tin No: 22414962670

Priority: E AUCTION

Destination:- With in State

Application No:EI4117084059

Raigarh Area

Washery: Gare Pelma IV/100

Party ID : 57224/900997

Coalgrade: G-15

Size: Sized ROM(-250mm)

Validity :45 Days from the Date of issue of Delivery Order

Type of Release:E AUCTION

Month of release of DO: JAN-2017

5.Coal Washery Name:

N.A

DO Code	DO Date	Party Code	Qty (MT.)	Particulars	Rate	Amount (Rs.)
010608711	24/01/17	900997	30000.00	Basic	1104.00	33120000.00
Details of DEPOSITED AMOUNT***Thirty Thousand .				Royalty	154.56	4636800.00
Deposited Amt. 59400600.00 Zero Mt. ***				NMET	3.09	92700.00
Amt. 0.00				DMF	46.37	1391100.00
1 Value 59400600.00				Stowing	10.00	300000.00
				Sizing	51.00	1530000.00
				Crushing	.00	.00
				Dumping	.00	.00
				Forest	.00	.00
				Terminal tax	.00	.00
				Trns charge	.00	.00
				Others	.00	.00
				CE Duty	83.04	2491200.00
				Entry Tax	1.00	560100.00
				VAT	5.00	2828700.00
				MPCSVA	.00	.00
				Clean Env. Cess	400.00	12000000.00
				AVAP	15.00	450000.00

END Amt. FORFIETED 0.00

Total: * 59400600.00

Permitted Coal value: 59400600.00

Rupees Five Crores Ninety-Four Lacs Six Hundred And Zero Paise Only

10.C Form No.& DT.- C FORM NOT SUBMITTED

11.D Form No.& DT.- D FORM NOT SUBMITTED

12.I Form No.& DT.- 20 & 18-JAN-17

13.ETD Form No.& DT.- E FORM NOT SUBMITTED

14.CTD Form No.&DT.- CTD FORM NOT SUBMITTED

One should verify the coal value in Delivery Order with MR & other documents and intimate the discrepancy, if any. In case of non-receipt of any information within 3days of receipt of D.O from Area I be presumed that the D.O is in order. Necessary Tax Declaration is to be deposited at Area before delivery of Material, if necessary

Special By
g.D.E.O)

Checked By

Authorised Signatory

(Signature with Rubber Stamp)



Mahanadi Coalfields Limited
(A Subsidiary of Coal India Limited)
A Mini Ratan Company

संबलपुर कोर्ट के अधिकार क्षेत्र के अधीन/
(Under Jurisdiction of Sambalpur Court)

महानदी कोलफील्ड्स लिमिटेड
MAHANADI COALFIELDS LIMITED
(सब्सिडियरी ऑफ कोल इंडिया लिमिटेड की एक अनुसूची कंपनी)
(Subsidiary of Coal India Limited)

मुख्य कार्यालय/Regd Office: झरखपुर/Post: जागुन विहार, जिला: संभलपुर, Sambalpur, पिन/Pin-768020, ओडिशा/Odisha

प्रि/To

श्री महाप्रबंधक/महाप्रबंधक/C.G.M./G.M.

जिला: संभलपुर/मंडल: रांगार/लिंगुला/लिंगराज/कनिहा/इब भेली/ओरिवेट/बसुंधरा/लखनपुर क्षेत्र

Jannal/Alcher/Bharatpur/Hingula/Lingaraj/Kaniha/Ib Valley/Orient/Basundhara/Lakhanpur Area

शय/Sir

श्री मेसर्स/M/S:

TIN NO: 22414902670

JINDAL STEEL AND POWER LIMITED

KHARSTA ROAD

RAIGARH

Chattisgarh

DESTN: OUTSIDE ODISHA

RAIGARH

Chattisgarh

आवश्यक विवरण एवं पिछले पृष्ठ पर दी गई शर्तों के अनुसार कोयला दिया जाएगा

as be delivered coal as per details below and terms and conditions overleaf

विवरण/Particulars

क) महीना/Month

ख) टाइप ऑफ रिलीज एवं प्रायोरिटी/Type of Release & priority

ग) परीमाण/Quantity

घ) ग्रेड एवं आकार/Grade and Size

ङ) कहां से (स्रोत)/Source

च) भुगतान का विवरण/Payment of Details

AMOUNT RECEIVED FROM SERVICE PROVIDER

MSTC

2200000.00

No	Date	Bank	Amount (Rs.)	Charge Type	Rate	Total Charge
					(Rs/Tn)	(Rs.)

22/04/16	STATE BANK OF INDIA	20626265.00				
----------	---------------------	-------------	--	--	--	--

Bid Rate	1180.00	12980000.00
Spe. Royalty	165.20	1817200.00
SED	10.00	110000.00
Sizing	79.00	869000.00
NMET FUND (2%)	3.30	36347.00
NMET FUND (30%)	49.56	545160.00
Central Excise	89.22	981461.80
Clean Env't. Cess	400.00	4400000.00
GST	2.8	434783.32

Two Crore Six Lakh Twenty-Six Thousand and Sixty-Five Only)

Total Amount (Rs.): 22178949.12

NEA TRANSFER:

22826265.00

Money Receipt No. 0086188 dated 02-MAY-16

प्रतिनिधि का हस्ताक्षर
Party/Representative

द्वारा जाँच किया गया

Checked by

प्रभारी अधिकारी

Officer-in-Charge

प्रति/
er Copy

मा को अणसारित कर जमा करने तथा प्रति को परियोजना में रखने हेतु)

Senior Manager (MINING)