To,	From,
The Secretary, A.P. Electricity Regulatory Commission, Singareni Bhavan, Red Hills, Lakdi ka pool, Hyderabad – 500 008	M. Thimma Reddy, Convenor, People's Monitoring Group on Electricity Regulation, First Floor, 1-9-291/6/1, Vidyanagar, Hyderabad – 500 044

Date: 19 -11-2012

Respected Sir,

Sub:- Submission of objections and suggestions on FSA claims of the APDISCOMs for the second quarter of 2012-13 and request to be heard in person – Reg.

Ref:- Public Notice published in Newspapers regarding FSA proposals filed by APDISCOMs with the APERC.

1.1 The above Public Notice published in the Newspapers on 6th November 2012 directed that consumers have to file their suggestions/objections by 21st November 2012. Consumers were given just two weeks time to respond on such important issue. Given the amount of information involved to be examined and various issues raised along with variations in fuel costs this two weeks time is grossly inadequate to make any meaningful intervention on the part of consumers. We request the Commission to extend the date for submission of written suggestions/objections on the DISCOM proposals on FSA for the 2nd quarter of 2012-13.

1.2 The present FSA proposals of DISCOMs for the second quarter of 2012-13 filed with the Commission do not contain important information to decide on their claims. Even the information made available in the earlier proposals is not made available this time. In the case of the FSA claims for the years of 2010-11 and 2011-12 information on GCV of fuels used by different stations and corresponding variable cost was provided. This time this crucial information is missing. Here also it is to be mentioned that in the past the information in GCV contained combined GCV of local and imported coal. The GCV of local and imported coal was not provided separately. The Commission's Order dated 20th September 2012 on FSA claims for 2012 (paragraph 35) shows that the Commission was also provided with only combined GCV but not separate GCV for local and imported coal. It appears that both GENCO and NTPC are not willing to part information on actual GCV of imported coal. We request the Commission to direct GENCO and NTPC to provide GCV figures separately for local and imported coal.

2.1 APDISCOMs proposed to recover Rs. 982.32 crore through FSA of Rs. 0.8239 per unit related to power consumed during the second quarter of 2012-13.

2.2 APDISCOMs' FSA proposals show that while APERC approved procurement of 22,440 MU during 2nd quarter of 2012-13 DISCOMs were able to procure only 19,008 MU, a decline of 3,432 MU (15.27%). A great part of this decline could be attributed to decline in hydro power generation. While APERC estimated availability of 2,625 MU of hydro power only 861 MU could be generated during this quarter. There was a deficit of 1,764 MU of hydro power. During this quarter while the Commission approved procurement of 3,285 MU from open market DISCOMs were able to procure only 2,569 MU, a decline of 716 MU. DISCOMs in their filings on the present FSA proposals stated they are "constrained to procure power from short term sources through transparent tender procedures". While on the one hand they failed to procure the projected quantum of electricity from open market in spite of advanced knowledge of the deficit and on the other there are also doubts about the "transparency" of the procedures followed in procuring power from open market. While coal based plants of central generating stations and gas based plants in the state delivered more or less the quantities projected by APERC it were the coal based plants of GENCO that let down the state. These plants delivered nearly 1,000 MU less than the projected quantities. This may be attributed to coal shortage. But when central generating stations were able to deliver the projected quantities even in the background of coal shortage what stopped the GENCO plants from delivering their due. The Chief Minister frequently called upon NTPC to generate more power to bail out the state from darkness. But almost there was no word about APGENCO!

2.3 It is being alleged that delay in issuing environmental clearance for coal mining projects is coming in the way of mining enough quantity of coal. Environmental clearance is not an issue in delay in coal production. There appears to be deliberate delaying in coal production. Delay in environmental clearance is being shown as an important reason for lower coal availability in the country. But contrary to this the central Environment Ministry has already given enough clearances for coal mining. But there appears to be deliberate delay in commencing coal mining in the country to force imported costly coal on consumers in the country. According to a report Down to Earth (dated 15th November 2012), "India is estimated to produce 575 million tonnes (MT) of coal in 2012-13. In the past five years, **clearance has been given to almost double the existing capacity.** This despite companies, including the Coal India Ltd, producing much less than their capacity. According to the Comptroller and Auditor General report, of the **86 coal blocks slated to begin production** by 2010-11, only **28 have commenced.** Besides, these blocks produced only 34.64 MT against the target of 73 MT—**a shortfall by 52%".**

3.1 Though AP has access to more than 2700 MW gas based power generation capacity less than 1,000 MW capacity is only being operated due to shortage in natural gas availability. It is being alleged that this shortage is artificially created. There are two parts in the issue: low gas production and low gas allocation to power plants in AP. Gas production from KG basin declined from 60 MMSCMD to 28 MMSCMD. The RIL has attributed this decline to unexpected geological developments. Both the Director General of Hydrocarbons and central Ministry of Petroleum and Natural gas did not buy the argument of RIL related to decline in gas production from KG basin fields. It is a clear case of hoarding on the part of RIL to benefit from hike in gas prices in future, and it is putting pressure on the central government to hike natural gas prices on the lines of RLNG. The power generation lost due to cut down on gas production from KG basin fields is nearly equal to peak power demand deficit (for e.g., on 11-11-2012 peak demand was 11,479 MW, peak demand met was 9,579 MW and peak deficit was 1,900 MW). Had there been no decline in gas production there would have been no need for purchases from open market as well as steep power cuts imposed on all electricity consumers in the state. Even the state government of Maharashtra demanded the central government to nationalise KG basin gas fields. It is high time political as well as official circles in the state take up this artificial decline in gas production in RIL's KG basin gas fields seriously with the central government. There would have been no need for the present FSA proposals had the gas production at KG basin were maintained at earlier levels.

3.2 Even out of the total gas produced from RIL's KG basin fields power plants in AP were allocated a small portion. Out 30 MMSCMD of gas produced from these fields gas based power plants in AP were allocated only about 2.8 MMSCMD of natural gas. That is only about 10% of the gas produced from these gas fields was allocated to power plants in AP. In 2002 the APERC approved PPAs with new gas based power plants with a total capacity of 1500 MW on the assurance that adequate gas would be available to these plants from KG basin fields. But once gas production started the assurance given to these plants was forgotten. As these plants were approved on the assurance of availability of gas these plants should have first right on the gas produced from RIL's KG basin gas fields. If adequate quantity of gas was allocated to the gas based power plants in AP there would have been no power cuts, no open market procurement at high rates and new FSA proposals. It is high time the assurance given to these plants is delivered by the central government.

3.3 Overall, steps shall be taken to see that adequate gas is allocated to AP gas based power plants to save electricity consumers in the state from frequent FSA burden.

3.4 Even when gas based power plants with approved PPAs with DISCOMs are running short of natural gas two merchant plants belonging to Lanco and GMR groups were provided gas linkage with the recommendation of the state government, against the clear direction of the central government's directive that this gas shall not be provided to the plants that sell power at market rate. Because of this high cost of power has to be procured form these two plants because of power shortage in the state. Rs. 5.46 per unit is paid to power procured form Lanco unit and Rs. 3.90 per unit was paid to power procured form GMR unit. If the same gas was made available to the plants with approved PPAs Rs. 1.80 per unit would have been enough to access the same power. This implies that Rs. 97.33 crore additional burden was imposed on electricity consumers in the state because of diversion of gas to merchant power plants. In other words, 10 percent of the proposed FSA burden is because of this diversion of gas. We request the Commission not to allow this additional burden.

Table: Per Unit Variable Cost Burden

Plant	Variable cost according to ARR 2012-13 (Rs/U)	Variable cost according to FSA Proposals for Q2 of 2012-13 (Rs/U)		
		July	August	September
Coal based plants				
NTPC (SR)	1.74	1.52	1.39	1.49
Simhadri I	2.10	1.80	1.54	1.58
KTPS – A, B, C	1.35	2.08	2.16	1.95
VTPS – I, II, III	1.94	2.33	2.59	2.82
VTPS – IV	2.65	3.63	3.55	3.52
RTPP	2.18	3.34	3.48	3.39
Gas based plants				
APGPCL – St. 1	1.89	2.33	2.33	2.33
Reliance	1.72	2.09	2.06	2.03
Konaseema	1.80	2.09	2.10	2.01
Vemagiri	1.80	2.10	2.10	2.01
GVK	2.07	2.22	2.20	2.16
GVK Extn	1.80	2.10	2.11	2.02
Gautami	1.80	2.10	2.10	2.01
Spectrum	1.77	2.25	2.26	2.53
Lanco	2.04	2.26	2.19	2.24

4.1 From the above Table it is clear that while in the case of coal based plants of central generating stations (NTPC (SR) and Simhadri) variable costs reported under FSA proposals were lower than those mentioned the Aggregate Revenue Requirement (ARR) for the year 2012-13 in the case of GENCO plants variable costs reported under FSA proposals were higher than those mentioned the Aggregate Revenue Requirement (ARR). In the case of GENCO plants increase in variable costs range from Rs. 0.37 to Rs. 1.30 per unit. There is no explanation for this hike in variable costs of GENCO coal based plants. The use of imported coal may be one of the reasons! Even when local coal production is being neglected there is rush for imported coal. All facts need to be made public.

4.2 The increase in variable costs combined with its failure to deliver projected units of electricity even with imported coal leads to a legitimate question: What is happening in GENCO?

4.3 Variable cost of gas based power plants also registered hike leading to the proposed FSA burden. The increase in variable cost of gas based power plants from Rs. 0.09 to Rs. 0.76 per unit. In this case of the DISCOMs' proposals do no throw any light on the reasons for this hike. It may be because of use of costly imported RLNG. Is there need to import this costly RLNG when gas produced in the vicinity is more than the state's needs?

Prior period expenditure:

5.1 We request the Commission to closely scrutinize the claims of DISCOMs under prior period expenditure. Given the track record of GVK and Gautami the amounts claimed by them (Rs. 11.42 crore and Rs. 3.18 crore respectively) raises suspicion. The Commission needs to see that these claims are to be subjected to severe scrutiny.

5.2 Rationale in collecting income tax of firms from consumers needs to be reexamined. Rs. 108.35 crore of the prior period expenditure is accounted for by the income tax of the utilities. As the income tax is levied on revenues collected from consumers asking the consumers to bear the income tax burden of the utilities implies consumer paying for the same item twice. As the income earner is obligated to pay tax on its income to expect the consumers to bear the tax amount defeats the very purpose of this tax.

We request the Commission to provide us an opportunity to be heard in person during the public hearing on the above FSA claims of DISCOMs.

Thanking you,

Yours sincerely,

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Convenor,
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Hyderabad-500 044

Copy to :

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3. The Chief General Manager (P & RAC)
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4. The Chief General Manager (Operation)
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To,	From,
The Secretary, A.P. Electricity Regulatory Commission, Singareni Bhavan, Red Hills, Lakdi ka pool, Hyderabad – 500 008	M. Thimma Reddy, Convenor, People's Monitoring Group on Electricity Regulation, First Floor, 1-9-291/6/1, Vidyanagar, Hyderabad – 500 044

Date: 03 -12-2012

Respected Sir,

Sub:- Supplementary submission of objections and suggestions on FSA claims of the APDISCOMs for the second quarter of 2012-13 – Reg.

Ref:- Replies filed by DISCOMs.

Coal Related Issues:

1.1 Coal prices are increased even when the coal mining companies were reaping enormous profits. The mining companies in the country raised the coal prices by 25 to 40% even when they were reaping enormous profits. During the second quarter of the financial year 2012-13 Coal India Ltd., registered a net profit to Rs 3,078 crore. During the same period last financial year it earned a profit of Rs 2,593 crore. During this period while production increased by 11 percent profit increased by 18.7 per cent. Similarly SCCL is also earning profit of more than Rs. 300 crore every year. Consumers in the state have to bear this burden from increased prices of coal.

1.2 DISCOMs in their reply stated, "The increase in variable cost is due to increase in landed cost of domestic coal on account of increase in VAT, central excise duty, royalty, fuel surcharge hike and railway freight". But they did not explain to what extent these factors caused increase in variable cost. According to their own submission state and central governments themselves are responsible for this FSA burden being imposed on electricity consumers in the state. We are appealing to both the governments to rethink on their taxation and revenue mobilization policies and see that burden on the consumers is reduced.

1.3 Another important reason for the proposed FSA burden is the use of costly imported coal. The information provided by DISCOMs on NTPC plants show that the reported higher GCV of imported coal compared to domestic coal is not visible while it is several times costlier than domestic coal. Imported coal is said to have 80% more GCV than domestic coal. 1.6 MT of imported coal is said to be equivalent to 2.88 MT of domestic coal. When compared to the cost of imported coal this difference in GCV do not hold any comparative advantage of depending on imported coal. This brings in to question the preference shown by some power developers to go in for imported coal. This shows that they are trying to benefit from the price differential at the cost of consumers in the country.

Table: 1 NTPC Plants' Details

Month In 2012	RSTPS St. I & II		RSTPS St. III		Simhadri – I		Talcher St. II	
	% of Imported Coal	Weighted Average GCV (Kcal/Kg)	% of Imported Coal	Weighted Average GCV (Kcal/Kg)	% of Imported Coal	Weighted Average GCV (Kcal/Kg)	% of Imported Coal	Weighted Average GCV (Kcal/Kg)
April	0	3749	0	3673	12.92	3230	16.16	3151
May	01.55	3806	0	3592	20.21	3395	19.89	3095
June	02.65	3990	0	3662	13.92	3107	15.95	2810
July	03.34	4051	0	3535	13.53	3211	14.92	2812
August	00.45	4093	0	3659	00.35	3030	07.48	2643
Sept.	0	4086	0	3741	0	3297	08.06	2781

1.4 The above table shows that use of imported coal did not add significantly or make much difference to average GCV. The GCV of RSTPS which used no or almost insignificant amounts of imported coal reported higher GCV than Simhadri and Talcher plants which used significant portion of coal sourced from abroad. Within these two plants also imported coal did not seem to have made any difference. In the case of Simhadri – I plant in the month of September 2012 without use of imported coal GCV stood at 3297 Kcal/Kg. During June and July months when nearly 14 percent of coal was sourced from abroad GCV was below September level. In the case of Talcher Stage II also such experience could be found. During the month of September with 8% of coal from imported stock GCV stood at 2781 Kcal/Kg. During June with 15.95% imported coal GCV was 2810 Kcal/Kg only. Similarly during July with 14.92% of imported coal GCV was 2812 Kcal/Kg only. Imported coal is said to have 80% more GCV compared to domestic coal. There is need to examine the actual GCV of imported coal is in relation to the price paid to it.

Table: 2 Cost of Coal

NTPC Plant	Cost of Domestic Coal (Rs./MT)	Cost of Imported Coal (Rs./MT)	
RSTPS St. I & II	2234.83	4880.73	2.18
Simhadri – I	1982.47	5480.45	2.76
Talcher St. II	929.49	6118.82	6.58

1.5 Imported coal is two to six times costlier than domestic coal while it is only 80% more efficient. While abundant coal reserves are in the country there is no logic in going in for imported coal. Indian companies are showing more interest in developing imported coal fields than coal blocks allotted to them in the country. There is wide variance in the stated efficiency of imported coal and its cost in relation to domestic coal. It is more profitable to the power developers as well as consumers in the state to depend on domestic coal. But somehow all things "foreign" appears more attractive, including coal!

1.6 Coal India Limited produced 435 million tonnes of coal in 2011-12 from its reserves of 60 billion tones. At the same time public and private companies which are allotted coal blocks with aggregate reserves of 48 billion tonnes produced only 36 million tonnes of coal. The delay on the part of these companies may be deliberate as they planned to profit from import of costly coal.

1.7 DISCOMs in their replies stated that under CEA directions 30% of the coal shall be imported. NTPC figures show that in some projects imported coal was not at all used. It implies that importing a 30% of the coal requirement is not binding. Power plants on their own can source coal supplies. It is in this context that captive coal mines allotted to the power plants gains significance.

1.8 APGENCO was allocated captive coal mines more than seven years back to mine coal for use in its power plants. But there was no initiative on the part of GENCO to use this for it's as well as state's advantage. This delay on its part led to dependence on costly imported coal. If the captive blocks allocated to it were operationalised as stipulated by the Ministry of Coal of GoI there would have been no need to depend on costly imported coal.

1.9 Tadicherla coal block was allocated by the Ministry of Coal, Government of India to APGENCO on 6th December, 2005 as a captive block for its power plants. Production of coal at this mine was expected to commence in December 2008. Similarly, Anisettypally, Punukula – Chilka and Pengadapa coal blocks were also allocated to APGENCO on 20th February, 2007 for captive consumption. But there was no movement on the part of APGENCO to start mining. According to the norms coal mining is expected to begin in three to four years from the date of allocation of coal blocks. As there was no progress either on paper or on ground the coal blocks of Anisettypally, Punukula – Chilka and Pengadapa were de-allocated by the Ministry of Coal. In the case of Tadicherla the Ministry of Coal issued a show cause Notice to APGENCO, dated 3rd May, 2012. According to this Notice, "In the review meeting held on 11/12.01.2012 it was noticed that no serious efforts have been made by the Company to develop the coal block, even after repeated assurances tendered by the Company during the period. It is also noted that all the important/critical milestones such as grant of previous approval, Forest clearance, EMP, Mining Lease and Land acquisition are pending for Tadicherla – I coal block. The Company has repeatedly failed to keep its promise made to the Ministry and is thus non-serious about timely development of the block". They did not even procure relevant maps from SCCL.

1.10 Even when there is apparent and serious coal/fuel shortage no urgency was shown to utilize the resources made available to the GENCO. Rather it was stated that 30% of the coal is being imported at the directions of CEA. Because of inefficiency of GENCO consumers in the state are forced to bear the present FSA burden. Why shall consumers in the state pay for inefficiency of GENCO?

1.11 We request the Commission to direct APGENCO to steps expeditiously to mine coal from Tadicherla-I block and also reclaim the three coal blocks de-allocated. This will go along way to reduce dependence of costly imported coal and in return reduce burden on electricity consumers in the state.

Gas related issues

2.1 The Commission approved the PPAs of GVK Extension, Gautami, Konaseema and Vemagiri with aggregate capacity of 1500 on the assurance given by ONGC and GAIL that sufficient quantity of gas would be made available from KG basin gas fields of RIL. But once gas production started from these fields the above plants from AP were sidelined. As the above plants were set up on the assurance that RIL's KG basin field's gas would be available to them for their full use for 15 years they should have first right on this gas. But quite contrary to this a plant set up on the basis of imported LNG was given preference. Along with this plant many other plants which were not in the picture suddenly began to get more power than AP plants which in the past were given assurance on gas availability. It is high time the rights of the AP plants were restored. Once this is done not only power generation cost will come down but also availability of power in the state will increase. The present FSA to a large extent is a result of shortage of power supply in the state.

2.2 Natural gas from RIL's KG Basin was allotted to merchant plants of Lanco and GMR on the recommendations of the GoAP. While allocating gas to these plants the EGOM laid down the condition that they should supply power produced from this gas to DISCOMs within the state at the rate determined by the Commission, through a long-term PPA. But for a considerable time they supplied power outside the state in violation of conditions laid down by the EGOM. After a hue and cry in the state they started supplying power in the state but at the open market. This entailed huge burden on the consumers in the state.

2.3 There is reported to be a short term PPA with these merchant plants. As for as we know Commission has not approved these. There is no proceeding approving these short term PPAs. There were only mentions that DISCOMs approached the Commission to determine the price for these plants. While power from GMR plant is being procured at the rate of Rs. 3.90 per unit it is Rs. 5.46 per unit in the case of Lanco's merchant unit. Has the Commission approved these different prices? How can there be such difference in price for similarly placed power projects?

2.4 As far as Lanco II and GMR Barge mounted the ceiling price cannot be the standard, it is not the regulated price meant for these two plants specifically, is meant for short term power purchases from open market. These two plants are not green field projects, they got various facilities for their earlier projects and that is being used now. Gas was also allocated with the condition that power generated shall be made available to AP only at the price determined by the Commission. The Commission did not determine price for these two plants.

2.5 We have brought to the notice of the Commission as well as the Utilities in the state a provision in the National Electricity Tariff Policy which allows procurement of power from extension plants of existing plants with the approval of the Commission. The Commission had directed the DISCOMs submit their response on this. DISCOMs wrote to the state government. And we did not hear after wards either from the DISCOMs or the GoAP. But now everybody is after Lanco and GMR to sign long-term PPA, with questionable motives.

2.6 EGOM was reported to have decided on 24-02-2012 “that as M/s Lanco Kondapalli (Expansion) and GMR Tanir Bawi have signed the short term PPA till 30-05-2012 … after which the supply would be suspended if they fail to comply with the conditions specified by the EGOM for supply of domestic gas”. This implies that gas supply to these plants should have been suspended from 01-06-2012. But these two plants continue to get gas and sell power at open market rates, of course in the garb of Case 1 Bidding.

2.7 In the case of Lanco’s coal based thermal power plant at Amarkantak in Jharkhand coal linkage was cancelled as it does not have PPA with … But in AP even after repeated reminders over the years nothing is being done. It is nothing but an open collusion among the Utilities, state and central governments. Commission also seems to have contributed to it by increasing the ceiling price to Rs. 5.50 per unit.

2.8 Even after all this, controversy there are doubts whether Lanco and GMR are selling all the power produced by their merchant power plants in AP only.

2.9 During the first quarter of 2012-13 Rs. 155.72 crore additional burden was imposed on the consumers in the state by diverting gas from plants with PPAs to merchant plants of Lanco and GMR. During the years 2010-11 and 2011-12 Rs. 865 crore burden was imposed on the consumers in the state due to allocation of gas to these two merchant plants. Since 2010-11 the electricity consumers in the state have to pay Rs. 1118 crore additionally. The same shall be recovered from the merchant power plants. If this amount is recovered there will be no need to impose the FSA proposed by the DISCOMs for the 2nd quarter of 2013. These payments made to merchant plants of Lanco and GMR can be recovered through retaining payments to be made to power produced from the older units of these plants.

2.10 According to Section 86 (2) of the Electricity Act, 2003 “The State Commission shall advise the State Government on all or any of the following matters, namely:-

(i) Promotion of competition, efficiency and economy in activities of electricity industry;
(ii) Promotion of investment in electricity industry;
(iii) Reorganization and restructuring of electricity industry in the State;
(iv) Matters concerning generation, transmission, distribution and trading of electricity.”

Taking in to account the above powers conferred by the Act on the Commission we request the Commission to advise the State Government of Andhra Pradesh to recommend to divert gas allocated to the merchant plants in the state to the power plants which PPAs were approved way back in 2002 itself. In this context we would like to draw the Commission’s attention to the fact that though the PPAs of GVK Extension, Gautami, Konaseema and Vemagiri with aggregate capacity of 1500 were approved in 2002 they were not allowed to draw gas on pro rata basis from ONGC and Cairn fields and they have to wait until RIL's fields started to yield gas. But now the merchant plants were allowed to draw gas even the above plants with approved PPAs are running short of gas.

Other Issues

3.1 Commission itself is contributing to hike in power purchase costs – increase in ceiling of open market price to Rs. 5.50 per unit and recent increase in wind energy tariff are just two examples. And these decisions were also characterized by lack of transparency, and meant to benefit a section at the cost of the state. In this context we would like to draw attention of the Commission to Section 86 (3) of the electricity Act, 2003 which stipulates that "The State Commission shall ensure transparency while exercising its powers and discharging its functions."

3.2 Open market purchases were allowed quite in advance to facilitate procurement of power at lower rates. Even then power was purchased at higher rates. It was reported that even when cheaper power was available high cost power was procured to benefit a few at the cost of electricity consumers in the state.

We request the Commission

- Not to approve present FSA proposals of the DISCOMs.
- Direct GENCO to start coal mining in the captive blocks allocated to it expeditiously.
- Advise the state government to recommend transfer gas allocation from merchant plants to the plants which already have approved PPAs.
- Remind both the state and central governments on assurance given to the plants with PPAs on availability of gas from RIL's KG basin gas fields and see that these plants will get full requirement of gas.
- To take measures to recover Rs. 1118 crore additional burden imposed on the consumers from the merchant plants of Lanco and GMR.
- To rescind its Orders on increasing open market prices and wind energy prices and restore earlier rates.

Sincerely yours,

M. Thimma Reddy