

**BEFORE THE TELANGANA STATE ELECTRICITY
REGULATORY COMMISSION: HYDERABAD**

In the matter of:

O.P. No. 67 of 2025

**True-Up for FY 2024-25 and Annual Tariff for FY 2026-27 for Generation Business filed
by TGGENCO**

SUBMISSION OF OBJECTIONS / SUGGESTIONS

Date: 08th January 2026

To,
The Secretary
Telangana State Electricity Regulatory Commission
Vidyut Niyantran Bhavan,
GTS Colony, Kalyan Nagar,
Hyderabad – Telangana - 500046

Subject: Submission of Objections / Suggestions on O.P. No. 67 of 2025 – True-Up for FY 2024-25 and Annual Tariff for FY 2026-27 for Generation Business of TGGENCO

Respected Sir,

I, **Mohan R. Pinninti**, Director, People's Sentinel Forum, Hyderabad hereby submit my **Objections and Suggestions** on the petition filed in **O.P. No. 67 of 2025**, relating to the **True-Up for FY 2024-25 and Annual Tariff for FY 2026-27** for the generation business of TGGENCO, in accordance with the provisions of the **Electricity Act, 2003** and the **TGERC (Multi-Year Tariff) Regulations, 2023**.

This submission is made in my capacity as an informed electricity consumer and power sector professional, with the objective of assisting the Hon'ble Commission in ensuring **regulatory prudence, transparency, cost efficiency, and protection of consumer interest**. The enclosed objections and suggestions examine, inter alia, the prudence of capital and operational expenditure, performance parameters, fuel cost claims, controllable and uncontrollable factors, and the resultant tariff impact on consumers.

The **detailed Objections and Suggestions**, along with **Verification and Affidavit**, are enclosed herewith for kind consideration of the Hon'ble Commission.

I respectfully request the Hon'ble Commission to take this submission on record and pass appropriate directions/orders in the interest of justice and electricity consumers of the State of Telangana.

Request for oral hearing

The undersigned respectfully requests an opportunity for oral submission during the public hearing, to further submission, if any.

Thanking you.

Yours faithfully,



(Mohan R. Pinninti)

Director

People's Sentinel Forum

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Enclosures:

1. Verification
2. Affidavit
3. Objections & Suggestions on O.P. No. 67 of 2025

VERIFICATION LETTER

I, **Mohan R. Pinninti**, S/o Laxmi Narsimha Reddy, aged about 62 years, residing at **Plot No. 174, Ravi Society, Mahendra Hills, East Marredpally, Secunderabad, Hyderabad, Telangana – 500026**, do hereby verify that the contents of the accompanying **Objections and Suggestions** filed in **O.P. No. 67 of 2025** before the Hon'ble Telangana State Electricity Regulatory Commission, relating to the **True-Up for FY 2024-25 and Annual Tariff for FY 2026-27 for generation business of TGGENCO**, are true and correct to the best of my knowledge and belief, based on information available in the public domain, tariff filings of the petitioner, and my professional understanding of the power sector.

I further verify that no material facts have been concealed or suppressed and that the submission is made bona fide in the interest of electricity consumers and to assist the Hon'ble Commission in the regulatory process.

Verified at **Hyderabad**, Telangana, on this 08th day of **January 2026**.

Signature: 

Name: Mohan R. Pinninti

AFFIDAVIT**BEFORE THE HON'BLE TELANGANA STATE ELECTRICITY REGULATORY
COMMISSION: HYDERABAD****AFFIDAVIT**

I, **Mohan R. Pinninti**, S/o Laxmi Narsimha Reddy, aged about 62 years, residing at **Plot No. 174, Ravi Society, Mahendra Hills, East Marredpally, Secunderabad, Hyderabad, Telangana – 500026**, do hereby solemnly affirm and state as under:

1. I am the Objector in **O.P. No. 67 of 2025** before the Hon'ble Telangana State Electricity Regulatory Commission and am well acquainted with the facts of the case.
2. I have filed the accompanying **Objections and Suggestions** on the petition relating to the **True-Up for FY 2024-25 and Annual Tariff for FY 2026-27** for the generation business of TGGENCO, under the provisions of the **Electricity Act, 2003** and the **TGERC (Multi-Year Tariff) Regulations, 2023**.
3. The statements made in the accompanying Objections and Suggestions are true and correct to the best of my knowledge and belief, derived from official records, tariff filings, regulatory documents, and information available in the public domain.
4. I state that no material facts have been suppressed, concealed, or misrepresented and that the submissions are made bona fide and solely in the interest of electricity consumers and proper regulatory adjudication.
5. This affidavit is sworn in support of the accompanying Objections and Suggestions filed before the Hon'ble Commission in the above matter.

DEPONENT

Signature: 

Name: **Mohan R. Pinninti**

Objections/suggestions on TGGENCO Filings (O.P. No. 67 of 2025): True-Up for FY 2024-25 and Annual Tariff for FY 2026-27 for generation business.

Prepared by: Director, People's Sentinel Forum, Hyderabad

This report provides a granular technical and financial audit of the Telangana Power Generation Corporation Limited (TGGENCO) filings for the true-up of FY 2024-25 and the proposed revised tariff for FY 2026-27. The analysis is based on the provided documents, including Excel sheets with performance and financial data, and supplemented by external research on TGERC regulations, plant statuses, and other relevant factors. Focus is on thermal stations: KTPS (O&M), KTPS-V, KTPS-VI, KTPS-VII, KTPP-I, KTPP-II, BTPS, and the newly commissioned YTPS (Yadadri Thermal Power Station). Hydel stations are addressed where relevant (e.g., Srisailem HES).

The analysis follows TGERC Regulation 2 of 2023, emphasizing controllable vs. uncontrollable factors, sharing of gains/losses, and justification for cost overruns. Key findings include deviations in operational parameters, O&M spikes, fuel cost impacts, and suggestions for diversification.

1. Station-wise Performance Audit (Actual vs. Approved)

Using data from consolidated thermal sheets and station-specific filings, the following comparison tables highlight variances in Station Heat Rate (SHR), Auxiliary Energy Consumption (AEC), and Secondary Fuel Oil (SFO) consumption. TGERC normative SHR for coal-based plants post-2019 COD is 1.05 times design heat rate (typically 2,250-2,400 kcal/kWh for super-critical units; higher for sub-critical). Actual SHR exceeding norms is flagged as a controllable factor, potentially due to maintenance issues or coal quality.

1.1 Plant-wise Variance Table

Parameter	Unit	TGERC Approved (Normative)	TGGENCO Actual (True-Up)	Variance (+/-)	Analyst Notes / Red Flags
Operational Norms					
Station Heat Rate (SHR) - Consolidated Thermal	kcal/kWh	2,290.5	2,373.37	+82.87	Excess SHR indicates lower efficiency; flagged for all stations as it exceeds TGERC norms for super-critical units (e.g., KTPS-VII). Likely due to coal GCV variations or maintenance delays.

Parameter	Unit	TGERC Approved (Normative)	TGGENCO Actual (True-Up)	Variance (+/-)	Analyst Notes / Red Flags
					Controllable; partial disallowance recommended.
SHR - KTPS-V (Sub-critical, 500 MW)	kcal/kWh	~2,450 (estimated from filings)	~2,500 (inferred from ECR 4.077 Rs/kWh)	+50	Higher than norms; potential impact from aged equipment. Flag for audit.
SHR - KTPS-VI (Sub-critical, 500 MW)	kcal/kWh	~2,450	~2,500 (ECR 4.132)	+50	Similar to KTPS-V; excess may be controllable.
SHR - KTPS-VII (Super-critical, 800 MW)	kcal/kWh	2,290	2,373	+83	Exceeds TGERC 1.05x design; sub-critical penalty not applicable, but variance flagged.
SHR - RTS-B (Old, 62.5 MW)	kcal/kWh	~3,000 (estimated)	~3,200 (inferred)	+200	High due to age; phased out the unit.
SHR - KTPP-I (Sub-critical, 500 MW)	kcal/kWh	~2,450	~2,500 (ECR 3.18)	+50	Moderate variance; check coal blending.
SHR - KTPP-II (Super-critical, 600 MW)	kcal/kWh	2,290	2,373 (ECR 2.983)	+83	Flag; associated with Tadicherla delays increasing IDC.
SHR - BTPS (Sub-critical, 1,080 MW)	kcal/kWh	2,500 (with relaxation for sub-critical)	2,583 (ECR 3.782)	+83	Exceeds norms; sub-critical penalty may apply per TGERC. Flag for generator transformer failure impact.
SHR - YTPS (Super-critical, 4,000 MW)	kcal/kWh	2,290 (normative for new)	N/A (infirm stage)	N/A	Newly commissioned (Unit 2 in Dec 2024; full by Feb 2026); strict scrutiny on initial SHR. Estimated design ~2,180; monitor for 1.05x norm.
Aux. Energy Cons. (AEC) - Consolidated	%	9.0	9.00	+0.00	Minimal variance; no flag.
AEC - KTPS-V	%	8.5	8.35	-0.15	Gain; share per regulation.
AEC - BTPS	%	9.0	9.07	+0.07	Minor excess; controllable if maintenance-related.

Parameter	Unit	TGERC Approved (Normative)	TGGENCO Actual (True-Up)	Variance (+/-)	Analyst Notes / Red Flags
Secondary Fuel					
(SFO) - Consolidated	ml/kWh	0.5	0.26	-0.24	Gain; fewer trips. No flag.
SFO - KTPS-VII	ml/kWh	0.5	0.46	-0.04	Efficient; no flag.
SFO - KTPP-II	ml/kWh	0.5	0.89	+0.39	Excess; flag for startup issues or Tadicherla coal quality.
O&M Expenses					
Manpower / Employee Cost - Consolidated	Rs. Cr	1,200 (estimated from O&M)	1,700 (inferred spike)	+500	Spike in FY 2024-25; likely due to wage revisions and YTPS recruitment. Controllable if not justified. Per MW ~ Rs. 0.27 Cr (total capacity ~6,484 MW).
Employee Cost - KTPS-V	Rs. Cr	239.06	250.46	+11.4	Minor; no major spike.
Employee Cost - BTPS	Rs. Cr	354.74	372.89	+18.15	Higher; check for new hires.
Repair & Maintenance (R&M) - Consolidated	Rs. Cr	500 (5% of GFA)	600	+100	Escalation; verify against K-factor.
Administrative & Gen (A&G) - Consolidated	Rs. Cr	200	250	+50	Sharp rise in security/IT; flag if uncontrollable.
Fuel & Mining					
Landed Cost: SCCL/CIL - Consolidated	Rs./MT	~2,500	~2,700	+200	Higher due to blending; SCCL costlier than CIL.
Tadicherla Input Price - KTPP-II	Rs./MT	N/A	~2,113 (from filings)	N/A	Compared to SCCL ~2,500; lower but delays increased IDC by ~Rs. 1,345 Cr for KTPP-II. Flag for justification.
Blending Ratio (Cap:Link) - KTPP-II	%	50:50	30:70 (inferred)	N/A	High SCCL blending increases ECR by ~0.2 Rs/kWh vs. Tadicherla use.

1.2 Key Observations:

- SHR excesses are widespread in thermal stations, leading to higher energy charges (~Rs. -153 Cr deviation, shared as -Rs. 102 Cr gain). Flagged for KTPS-VII, KTPP-II, and BTPS.
- AEC and SFO are generally within norms, with gains in SFO.
- Fuel: SCCL landed cost higher than CIL; Tadicherla delays (land acquisition issues) raised input price and IDC for KTPP-II.

2. O&M Expenses & Manpower

Actual O&M: Rs. 2,700 Cr vs. approved Rs. 1,869 Cr (+Rs. 832 Cr).

- **Per MW:** Rs. 0.42 Cr actual (total capacity 6,484 MW).
- Employee cost spike in FY 2024-25: ~35% increase, likely due to wage revisions and recruitment for YTPS (new 4,000 MW capacity). Controllable if not linked to uncontrollable factors like inflation. No evidence of new recruitment for YTPS in filings; flag for justification.
- **Suggestion:** Train staff for renewables/BESS; depute to consultancy (e.g., energy audits). Redeploying of staff RTS- B station to other units immediately and automate operations to cut 10-15% manpower.

3. Coal Supply & Fuel Cost

- Landed cost: SCCL ~Rs. 2,700/MT, CIL ~Rs. 2,500/MT (from station F11 data).
- ECR impact of blending: Using more SCCL (costlier) vs. Tadicherla increases ECR by 0.2-0.3 Rs/kWh. Tadicherla input price Rs. 2,113/MT (lower), but delays raised overall variable costs.
- Overall energy charges lower than approved (Rs. 8,144 Cr vs. Rs. 8,298 Cr), likely due to better GCV or blending efficiencies.

4. Tadicherla-I Coal Mine Analysis

- Delays: Land acquisition issues (ongoing as of Nov 2025); historical cancellation in 2015, re-allotted to TGGENCO. Operational now (safety awards in Sep 2025), but delays increased IDC for associated plants like KTPP-II by Rs. 1,345 Cr (fixed cost impact).
- **Input Price:** Rs. 2,113/MT claimed; lower than SCCL notified (~Rs. 2,500/MT), but TGERC historically critical. Critique: Justification needed vs. SCCL rates; delays are uncontrollable, but poor planning may be controllable.

5. Merit Order Dispatch (MOD)

Based on proposed variable costs (ECR) for FY 2026-27:

Plant	Proposed ECR (Rs/kWh)	Rank in MOD Stack	Risk of Back-Down
KTPP-II	2.737	1 (Lowest)	Low; base load.
KTPP-I	2.921	2	Low.
KTPS-VII	3.434	3	Medium.
BTPS	3.677	4	High; sub-critical, high ECR due to failures.
KTPS-V	3.737	5	High.
KTPS-VI	3.853	6	High.
RTS-B	8.532	7	Highest; old plant, likely backed down.
YTPS	~3.0 (estimated)	3-4	Medium; new, but monitor commissioning.

Plants with ECR >3.5 Rs/kWh (BTPS, KTPS-V/VI) at risk of back-down due to cheaper renewables/imports. Explore opportunities for ECR in BTPS, KTPS, and YTPS plants through comparative analysis to avoid risk of back down.

6. Losses on Account of Generator Burnt at Srisailam HES

- Incident: Major fire in Aug 2020 (not 2024-25); 9 dead, caused by short circuit in Unit 4. Delay in repairing: ~6 months, loss of generation ~500 MU (estimated at 900 MW capacity).
- Cost: ~Rs. 200 Cr (lost revenue at Rs. 4/kWh); environmental/safety issues. No recent incident in filings; if related to 2024-25, disallow if controllable negligence.

7. Failure of Generator Transformer at BTPS

- Incident: Fire in Unit 1 transformer (Jul 2024); not lightning, likely internal fault. Delay in replacement: 3-6 months, loss of generation ~1,000 MU.
- Cost: ~Rs. 400 Cr (lost revenue); repair cost Rs. 50 Cr. Controllable if maintenance lapsed; flag for disallowance.

8. Possibilities for Solar Plants and BESS Using Vacant Lands

TGGENCO has vacant lands at stations (e.g., KTPS, BTPS).

8.1 Opportunities:

- Solar: Develop 56 MW ground-mounted solar (DPRs sought in Feb 2025). Potential 100+ MW across sites.
- BESS: TGGENCO tendered 375 MW/1,500 MWh standalone BESS (Nov 2025) and 250 MW/500 MWh pilot (Jan 2025). Land leased at Rs. 1/acre/year. Integrate with solar for hybrid; reduce coal dependence.
- A deep analysis may be conducted to ensure the best utilization of vacant land by effectively using all available resources.

9. Analysis of Coal Sampling Deviations and Compliance with FSA Conditions

This para addresses the specific concern regarding the absence of discussion on coal sampling deviations in TGGENCO's filings for the true-up of FY 2024-25 and the proposed tariff for FY 2026-27. It examines the potential overcharging of coal costs due to unaddressed quality deviations, the role of third-party sampling reports, associated debit/credit adjustments, and bills raised. The analysis is grounded in a review of the provided filings, Fuel Supply Agreement (FSA) standards under Singareni Collieries Company Limited (SCCL) and Coal India Limited (CIL), and relevant regulatory precedents from the Telangana Electricity Regulatory Commission (TGERC) and other sources.

9.1 Overview of Coal Sampling in Indian Power Sector

Coal quality, measured primarily by Gross Calorific Value (GCV), ash content, and moisture, directly impacts the Energy Charge Rate (ECR) and overall generation costs. Under standard FSAs with SCCL and CIL, coal is graded (e.g., G11, G12), and payments are based on "as-billed" GCV. However, actual "as-received" quality at the power plant may deviate due to transit losses, moisture absorption, or supplier inconsistencies. To mitigate this, FSAs mandate third-party sampling by independent agencies (e.g., CIMFR or PFC-approved entities) at loading and unloading points. Deviations trigger price adjustments:

- If received GCV is lower than billed, the buyer (e.g., TGGENCO) receives credits/debits from the supplier.
- National averages show grade conformity around 80-85% based on third-party results, implying 15-20% potential deviations leading to cost recoveries.

In FY 2024-25, India's coal sector reported a third-party sampling conformity of 80.80%, indicating scope for recoveries through adjustments. Failure to enforce sampling can lead to overpayments, inflating variable costs passed to consumers.

9.2 Absence of Discussion in TGGENCO Filings

A comprehensive search of the filings (Volumes 1-5 PDFs and associated Excel sheets) reveals no explicit discussion of coal sampling deviations, third-party reports, or related adjustments. Key findings:

- **PDF Volumes:** No mentions of "coal sampling," "third-party sampling," or "FSA conditions." The Cost Audit Report (Vol 4) references minor "deviations" only in the context of solar plant contributions, not coal.
- **Excel Sheets:** Station-specific files (e.g., KTPS-V to BTPS) include line items for "Handling, sampling and such other similar charges" in Form F11 (Fuel Costs), indicating sampling costs are embedded in landed coal prices (e.g., Rs. 2,700/MT for SCCL). However, there are no details on actual deviations, GCV tests, debit/credit quantities, or bills raised for adjustments.
- **Fuel Data Insights:** Forms F10 and F11 show projected transit losses (0.8%) and GCV values (e.g., 3,500-4,000 kcal/kg for SCCL coal), but no variance analysis between billed and received quality. Consolidated energy charges are Rs. 8,144 Cr (actual) vs. Rs. 8,298 Cr (approved), a savings of Rs. 154 Cr, potentially masking unclaimed recoveries from deviations.

This omission is a red flag under TGERC Regulation 2 of 2023, which requires transparency in controllable costs like fuel procurement. TGGENCO's reliance on SCCL (major supplier) without reporting sampling outcomes suggests potential non-compliance with FSA clauses.

9.3 FSA Conditions and Third-Party Sampling Requirements

TGGENCO's primary coal sources are SCCL mines only. Standard FSA conditions (as per SCCL's model e-FSA and CIL modifications) include:

- **Third-Party Sampling Mandate:** All supplies must be verified by an independent agency (e.g., CIMFR). Sampling occurs at loading (mine end) and unloading (plant end). Costs are shared or borne by the supplier.
- **Deviation Handling:** If grade variation exceeds tolerances (e.g., ± 1 grade slip), prices are adjusted. For example, if billed as G11 (3,700-4,000 kcal/kg) but received as G12 (3,400-3,700 kcal/kg), the buyer gets a credit based on the differential (e.g., Rs. 200-300/MT).
- **Billing Adjustments:** Suppliers issue debit/credit notes post-sampling reports. Non-compliance can lead to disputes or penalties.
- **Telangana-Specific Context:** TGERC has criticized lack of third-party verification in past orders (e.g., for SCCL supplies to STPP). Recent news (October 2025) highlights TGGENCO accusing SCCL of supplying poor-quality coal to Telangana while exporting higher grades elsewhere, underscoring ongoing quality issues.

If TGGENCO is not enforcing these, it violates FSA terms, leading to unrecovered overpayments.

9.4 Potential Savings from Addressing Deviations

Assuming 15-20% grade slippage (national average), TGGENCO's coal consumption (~20-25 million tonnes in FY 2024-25, inferred from energy charges and average Rs. 2,600/MT landed cost) could yield:

- **Overpayment Estimate:** Rs. 500-800 Cr annually if 10% of supplies are under-graded (e.g., Rs. 200/MT differential on 2-2.5 MT).
- **Savings Potential:** Enforcing third-party reports could recover 5-10% of fuel costs (Rs. 400-800 Cr), reducing ECR by 0.1-0.2 Rs/kWh. Studies on Indian coal plants indicate efficiency gains of up to Rs. 2,387 billion nationally through better quality control, with Telangana's share potentially Rs. 100-200 Cr.
- **High Costs Impact:** Current filings show SCCL coal at Rs. 2,700/MT vs. CIL at Rs. 2,500/MT; unaddressed deviations amplify this, contributing to SHR excesses (e.g., +83 kcal/kWh in KTPS-VII) and higher variable costs.

9.5 Reasons for Non-Compliance and Recommendations

If third-party sampling is not followed:

- **Possible Reasons:** Reliance on SCCL (state-owned) leading to relaxed enforcement; logistical challenges; or historical disputes (e.g., SCCL findings on unfair FSA clauses).
- **Regulatory Implications:** Controllable under TGERC; disallow pass-through of unverified costs. TGGENCO must justify why FSA conditions are not adhered to, as per Coal Ministry guidelines emphasizing third-party sampling for transparency.

10. State Government Intervention in SCCL Pricing under Electricity Act, 2003

This para addresses Telangana State Government intervention in Singareni Collieries Company Limited (SCCL) pricing under the Electricity Act, 2003 (EA 2003), focusing on **Section 108**.

10.1 Key Provision: Section 108, EA 2003

- Allows the State Government to issue written policy directions to the State Commission (TGERC) on matters involving **public interest**.
- Decision on whether a direction qualifies as policy/public interest is final with the State Government.

10.2 When Intervention is Possible

- In cases of high fuel costs impacting tariff affordability, consumer interest, or electricity sector efficiency.

- Applicable indirectly to SCCL pricing when monopoly premiums inflate generation costs/tariffs (public interest issue).
- Limited to policy guidance; cannot override TGERC's quasi-judicial functions (per Supreme Court rulings).

10.3 Possible Directions Under Section 108

- Direct TGERC to apply stricter prudence checks on SCCL coal costs in tariff determinations/true-ups.
- Mandate benchmarking SCCL prices against CIL rates.
- Require competitive procurement or higher blending of cheaper coal to reduce ECR.
- Ensure geographical advantages (low freight from nearby mines) are passed to consumers via lower tariffs.
- Frame regulations for fuel cost adjustments prioritizing affordability.

10.4 Implications for Current Filings

SCCL's higher pricing (~Rs. 2,700/MT vs. CIL ~Rs. 2,500/MT) contributes Rs. 500-1,000 Cr excess costs annually, despite proximity savings. Intervention could cap pass-through, reducing the Rs. 1,707 Cr true-up gap by Rs. 200-300 Cr.

10.5 Suggestion

Section 108 provides a viable mechanism for policy intervention to curb SCCL monopoly effects and ensure consumer benefits. Recommend issuance of directions for enhanced scrutiny in this true-up proceeding.

11. Gap Analysis: 5-7 Specific Data Gaps/Queries for TGGENCO

1. Provide station-wise SHR breakdown for FY 2024-25 (actual vs. normative); explain excesses in KTPS-VII and BTPS.
2. Breakup of O&M spike (Rs. 832 Cr); detail wage revisions vs. YTPS recruitment.
3. Justification for Tadicherla input price (Rs. 2,113/MT) vs. SCCL; quantify IDC impact from delays.
4. Details on BTPS transformer failure: repair timeline, generation loss, and cost recovery plan.
5. Srisailam HES fire impact (if any in 2024-25); loss quantification and preventive measures.
6. YTPS commissioning plan and initial SHR/O&M norms; explain infirm power billing (Rs. 193 Cr).
7. Blending ratio data for SCCL/Tadicherla; ECR sensitivity analysis.

8. Provide third-party coal sampling reports for FY 2024-25 (SCCL and CIL supplies), including GCV deviations between billed and received coal.
9. Detail debit/credit quantities adjusted due to quality deviations, along with bills raised/recovered from suppliers.
10. Explain the absence of discussion on sampling deviations in the filings and quantify potential overpayments/savings.
11. If FSA conditions for third-party sampling are not followed, provide reasons and steps to ensure compliance in FY 2026-27.
12. Submit station-wise breakdown of sampling charges (embedded in fuel costs) and their impact on ECR.
13. Has the State Government issued any Section 108 directions to TGERC on SCCL pricing/fuel costs? If not, justify in light of public interest impacts.

12. Regulatory Conclusion

The requested true-up (net revenue gap Rs. 1,707 Cr) is partially justified under Regulation 2 of 2023. Uncontrollable factors (e.g., Tadicherla delays, fuel price hikes) account for ~70% of deviations, but controllable elements like SHR excesses, O&M spikes, and maintenance failures (BTPS, Srisailam) warrant disallowances (~Rs. 350-500 Cr). Energy charge gains should be shared. Approve with conditions: detailed audits on flagged items, cap O&M escalation at 5%, and mandate BESS/solar diversification for cost reduction. Overall, filings align with regulations but require stricter prudence checks

The Hon'ble Commission may kindly:

- Allow true up subject to disallowance of controllable excesses.
- Issue binding directions on coal sampling enforcement
- Cap O&M and other costs.
- Mandate efficiency improvement road map
- Protect consumer interest through strict prudence checks.
- Guide/advice State Government for policy intervention to curb SCCL monopoly pricing effects and ensure consumer benefits.