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Submitted to Rajasthan Electricity Regulatory Commission

# Submission on RVUN Petition for Annual Performance Review (APR) for FY 2023-24

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CENTRE FOR ENERGY, ENVIRONMENT & PEOPLE

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## **1. INTRODUCTION**

Rajasthan Vidyut Utpadan Nigam Ltd. (RVUNL) has submitted a petition for the Annual Performance Review (APR) for the FY 2023-24 to the Rajasthan Electricity Regulatory Commission (RERC), hereafter Commission, in accordance with the provisions outlined in the RERC Tariff Regulations 2019. The RERC has made the petition available on its website for public objections and suggestions.

This submission is being made in response to the petition filed by RVUNL, as published on the Commission's website. We respectfully request the Commission to consider this submission for inclusion in the record. The comments and suggestions are organized under the following sections:

1.1 General Comments

1.2 Section-wise Comments

1.3 Comments of Compliance of Commission's Directives

1.4 Issues raised by the Independent Auditors

## **2. GENERAL COMMENTS**

### **2.1. Approach towards Performance Review**

We would like to highlight that the Commission's current approach of treating RVUNL's Performance Review petition as a mere truing-up exercise of previously approved financials is insufficient. By focusing narrowly on financial reconciliation, the Commission risks neglecting critical operational and strategic aspects that directly influence RVUNL's efficiency, reliability, and long-term viability. Given RVUNL's pivotal role in Rajasthan's power sector, a superficial review fails to capture the broader performance challenges and opportunities.

It is imperative that the annual performance review of RVUNL be transformed into a rigorous and holistic evaluation, encompassing both financial prudence and operational excellence. Limiting the assessment to traditional parameters such as Plant Availability, Plant Load Factor, and Station Heat Rate is inadequate. The review must incorporate comprehensive criteria, including environmental compliance, safety protocols, workforce development, maintenance schedules, and RVUNL's strategic initiatives in planning, diversification, and business development. All of these factors in turn impact the overall finances and ultimately the tariff of the end consumers.

In this context, we would like to highlight the work of other SERCs like Maharashtra Electricity Regulatory Commission, which are adopting a more thorough approach in assessing the performance of generation utilities and Discoms. This practice ensures greater transparency, accountability, and continuous improvement. Rajasthan, too, must adopt similar best practices to safeguard the long-term interests of the sector and its stakeholders.

Accordingly, we strongly recommend the Commission to mandate RVUNL to submit detailed disclosures across the above metrics and establish a robust framework for future

performance evaluations in close consultation with stakeholders. Strengthening this process will not only improve RVUNL's operational performance but also ensure greater alignment with state and national energy objectives.

## **2.2. Issues with the Petition Documents**

We submit that the petition documents uploaded by the Hon'ble Commission for public comments are incomplete and riddled with several critical issues. The petition references 43 annexures (Annexure A to Annexure AC) and various sections that have not been uploaded. The uploaded documents are in a poorly scanned image format, making them unclear and indecipherable in many places (see examples in Annexure – 1). Some specific instances of unclear details are included at following locations:

- 2.1.1 Pages 17, 18, and 21 (Main Petition Document)
- 2.1.2 Pages 108–113 (Energy charges for thermal generation)
- 2.1.3 Pages 125–131 (Fuel consumption charges)
- 2.1.4 Pages 132–143 (Coal-related information)
- 2.1.5 Pages 145–159 (Energy charge details)
- 2.1.6 Pages 169–171 (Loan repayment, lease, and liability details)
- 2.1.7 Page 162 (Unclear content)

The petition has not been provided in a machine-readable text format, which is critical for an effective review of the documents. Furthermore, RVUNL has failed to upload the accompanying Excel sheets, vital for a comprehensive assessment of financial and operational data. This longstanding issue among state power utilities remains unresolved despite repeated requests. Such practices obstruct stakeholders' ability to analyse the petition and offer constructive feedback, undermining the principles of transparency and accountability. We raised these concerns with the Hon'ble Commission via a letter dated 25.12.2023, yet no corrective action has been taken.

We urge the Hon'ble Commission to direct the petitioner to promptly address these issues by ensuring the complete petition, including all annexures, is made available in a clear and accessible format to facilitate comprehensive review and analysis for this year and all future petitions.

## **2.3. Return on Equity for State Genco**

In Rajasthan, state power utilities have not been claiming Return on Equity (RoE) in their Annual Revenue Requirement (ARR) petitions for several years, leading to a deterioration in their financial and operational performance. The absence of this critical 'Plus' component renders the current cost-plus regime ineffective, impacting consumers of the state both directly and indirectly. It has been seen that RoE claims by state utilities are often subject to State Government approval, with the government sometimes imposing reductions or waivers. Such decisions should remain solely within RVUNL's petition process, without direct intervention from the State Government. If the State Government mandates reductions or

waivers, it must compensate the utilities by providing equivalent funds from its own budget. The continued denial of RoE funding undermines the utilities' financial sustainability and operational efficiency, increasing the risk of poor performance and inadvertently paving the way for privatisation.

Therefore, it is suggested to ensure that RVUNL is granted a fair RoE to support their sustainability and performance, especially when Central and private companies continue to claim it.

#### **2.4. Regarding Safety and Environmental Compliance**

We would like to draw the Commission's attention to several news reports (refer to Annexure – 2) highlighting accidents at various power plants operated by the petitioner. Despite the Commission's directive for RVUNL to conduct a safety audit of all plants, the petitioner has only shared its internal circular to the plants and has not provided any details of an audit or review as instructed. Ensuring the safety of workers and plants is critical for human well-being, productivity, legal compliance, and the organization's reputation. Therefore,

- We request the petitioner to provide plant-wise details of safety and training initiatives, along with the allocated budget, for the fiscal year 2023-24.
- We request the petitioner to provide details of the most recent safety audits conducted at its plants and to share the relevant reports
- We further urge the Commission to take strict note of these accidents and safety violations, and recommend the formation of a committee, with representation from employees and civil society, to investigate the incidents at each plant. The committee should identify the root causes and propose corrective actions
- We request the petitioner to share their plan for enhancing safety compliance and minimizing accidents.

Additionally, several reports and publicly available data (see Annexure – 3) highlight violations of environmental norms and local issues at the petitioner's power plants in Chhabra, Suratgarh, and Kali Sindh, particularly concerning fly ash disposal, water usage, and SOx emissions. Therefore,

- The petitioner is requested to provide plant-wise compliance data on emissions and water consumption, in line with approved environmental clearances for each plant.
- We also request details of any environmental violations, the actions taken to address them, and any penalties imposed (if applicable) during the fiscal year 2023-24.

#### **2.5. Capacity Expansion and Diversification Plans**

In the context of the ongoing energy transition, new coal-based capacity additions tied to 25-year fixed-cost power purchase agreements (PPAs) present significant risks of long-term lock-in, especially considering the evolving energy mix and market dynamics. To mitigate these risks, it is essential that all new capacity proposals undergo thorough scrutiny by both

beneficiaries and regulators. Given the long gestation periods and the potential for stranded assets in the changing energy landscape, such investments could strain RVUNL's finances and place an undue burden on consumers. Therefore, stricter oversight is necessary for capacity additions under Section 62 by Rajasthan Vidyut Utpadan Nigam Ltd. (RVUNL). The commission should require RVUNL to submit a comprehensive business plan for each control period, outlining capital investments with clear justifications aligned with Rajasthan's energy needs.

Rajasthan, with a solar potential of 142 GW, is currently a leader in the country's solar power installations. The petitioner is well-positioned to harness this potential and support the state's power sector, particularly given the favourable pricing of solar power. We also request the petitioner to include details of RVUNL's strategy for business diversification and the integration of renewable energy into its portfolio in its comprehensive business plan. The commission is requested to approve these plans following prudence checks and public consultation.

## **2.6. Status of installation of the Flue-gas desulfurization (FGD) Equipment**

The Environment (Protection) Amendment Rules, 2015, notified by the MoEFCC in December 2015, revised the environmental norms for all thermal power plants (TPPs). To comply with the Sulphur Dioxide (SO<sub>2</sub>) emission norms, thermal power plants are required to install Flue Gas Desulphurisation (FGD) equipment within the timelines specified in subsequent MoEFCC notifications. The petitioner is requested to provide the current status of FGD installations at each RVUNL plant.

Additionally, the petitioner is requested to provide details of any techno-economic analysis conducted on a plant-wise basis, considering the costs associated with FGD installations and the potential penalties for non-compliance with MoEFCC mandates. In the absence of such an analysis, the petitioner is asked to explain their strategy for maintaining competitiveness within the merit order dispatch regime and other evolving scheduling and dispatch systems.

## **2.7. Planning for Ageing Power Plants**

Several units of the petitioner's plants have exceeded the 25-year useful life limit set by CEA regulations, with some are exceeding 35 years. While operating aged plants may offer economic benefits, it also presents challenges related to reliability, productivity, and efficiency. We propose that the Commission direct the petitioner to conduct a comprehensive study to assess the residual life and feasibility of continuing operations. The study should address technical, economic, environmental, and safety factors.

## **2.8. Status of retirement of KTPS**

The petitioner, in its earlier submissions, informed about the proposed retirement of units 1 to 4 of Kota TPS. We request the petitioner to provide current status and update on the retirement status and future plans for Kota TPS. The retirement and decommissioning of these units present opportunities for repowering or repurposing the plant, which could benefit the state. Therefore, we suggest that the Commission direct the petitioner to conduct

a comprehensive study to assess the potential end-uses of Kota TPS post-retirement, including repowering, and make a decision based on the study's findings

### **3. SECTION-WISE COMMENTS | ANNUAL PERFORMANCE REVIEW FOR FY 2022-23**

#### **3.1. Performance audit of MMH**

The petitioner has not provided any details regarding Mini-Micro power stations as per the regulated tariff under Regulation 57 of the Tariff Regulations 2019. The petitioner is requested to submit details of these power stations, including their capacity, generation, and plant load factor (PLF) for the year for public information.

#### **3.2. Claim of Terminal Benefits**

The petitioner has claimed a fixed cost of Rs. 5,876.34 Cr, compared to the approved fixed cost of Rs. 5,988.70 Cr. It should be noted that the reduced claim is primarily due to non-expenditure of Rs. 177.51 Cr on terminal benefits. The petitioner is requested to provide an explanation for not incurring any expenditure in this regard, along with future plans for addressing this expenditure.

#### **3.3. Claim of Return on Equity**

The petitioner has not included a claim for Return on Equity (RoE) in its fixed cost submission. In line with previous recommendations, it is suggested that the petitioner be mandated to file and claim RoE.

#### **3.4. Additional Capitalization for CTPP (U-1 to 4)**

The petitioner has submitted that it incurred Rs. 79.34 crore for the efficient and proper operation of the Electrostatic Precipitator at Unit 4, which was accidentally damaged, and has requested approval for additional capitalization of this amount. It is submitted that the incident resulted from poor coordination among the operations, maintenance, and other teams of RVUNL, as observed by the CEA and noted by the Commission in its order. Therefore, it is requested that the petitioner:

- Provide details of the accident at CTPPS Unit 4 ESP including relevant reports and the measures taken to ensure accountability.
- Submit its schedule for maintenance for all major equipment of all plants
- Submit details of breakdown of major equipment which led to plant shutdown and corrective action take to address

#### **3.5. Plant Availability**

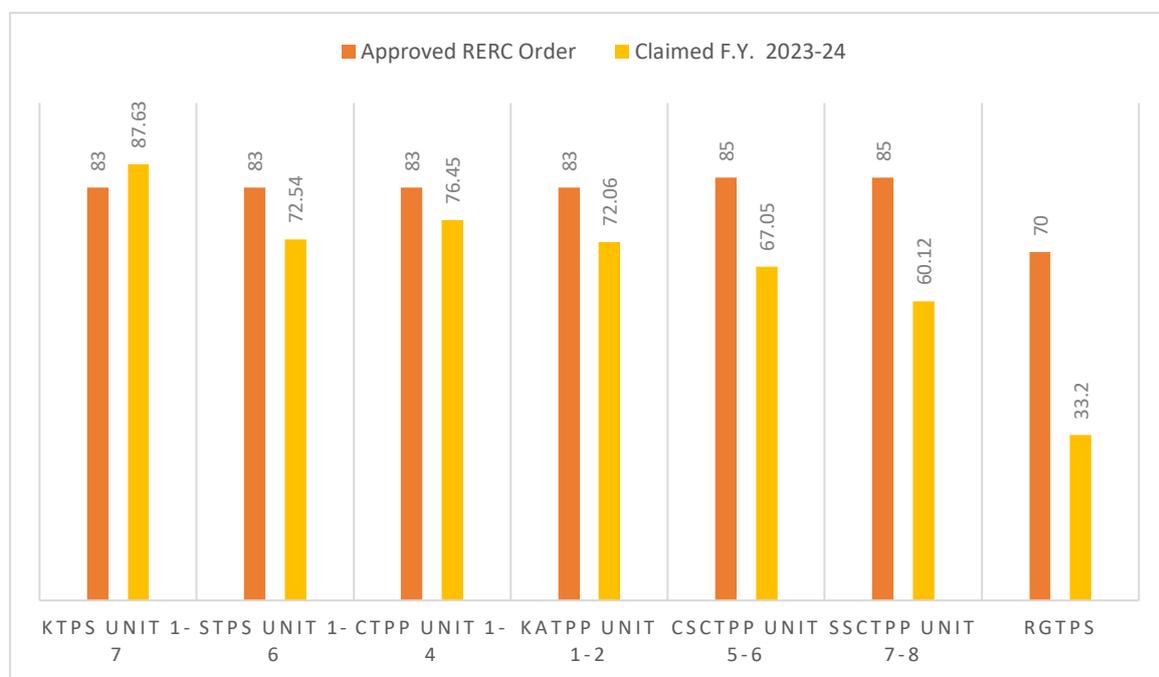
As per the data submitted by the petitioner, the plant availability across all plants—except KTPS Units 1-7—falls below the targets approved by the commission. For instance, the availability of SSCTPP is 25% below the target, indicating significant operational inefficiencies and suboptimal resource utilization. This underscores poor operation and maintenance practices by RRVUNL, coupled with the absence of actionable plans to address these issues.

Such poor performance compromises the energy security of the state, especially as the petitioner continues to claim normative availability of plants in their ARR while failing to achieve the same. This leaves the Discoms reliant on procurement through short-term agreements and exchanges. It is therefore requested that the commission direct the petitioner to:

- Furnish plant-wise explanations for failing to meet the target availability.
- Submit detailed plans to address these shortcomings for FY 2024-25.

Additionally, in accordance with Regulation 45 of the RERC Tariff Regulations, 2019, full fixed charges are recoverable only upon achieving the target availability. Accordingly, it is submitted that the Hon’ble Commission reject the petitioner’s request to approve full fixed costs for all plants, except KTPS Units 1-7. Instead, the Commission should allow recovery of fixed charges for these power plants strictly on a pro-rata basis.

Figure 1: RVUNL Plant Availability (%) for FY 2023-24



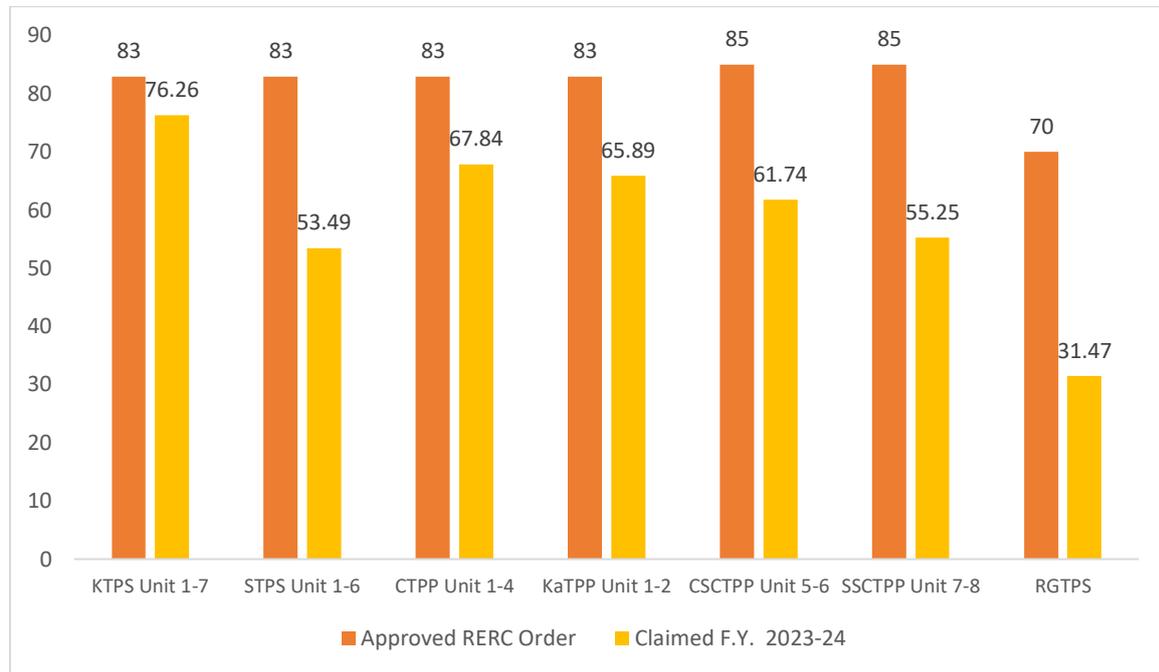
### 3.6. Plant Load Factor (PLF)

The data submitted by the petitioner indicates that the plant load factor (PLF) for all RVUNL power plants in FY 2022-23 was below the targeted levels. This highlights inefficiencies in the planning, operations, and maintenance of these plants. Notably, RVUNL plants have consistently operated at low PLFs over the past several years, reflecting a persistent issue.

We request the commission to take note of this serious concern and direct the petitioner to submit a comprehensive action plan to address these shortcomings, along with clear and appropriate timeframes. Additionally, we request the petitioner to provide detailed, plant-

wise explanations for the low PLFs, including reasons for the underperformance across all thermal power plants (TPPs).

Figure 2: RVUNL PLF (%) for FY2023-24

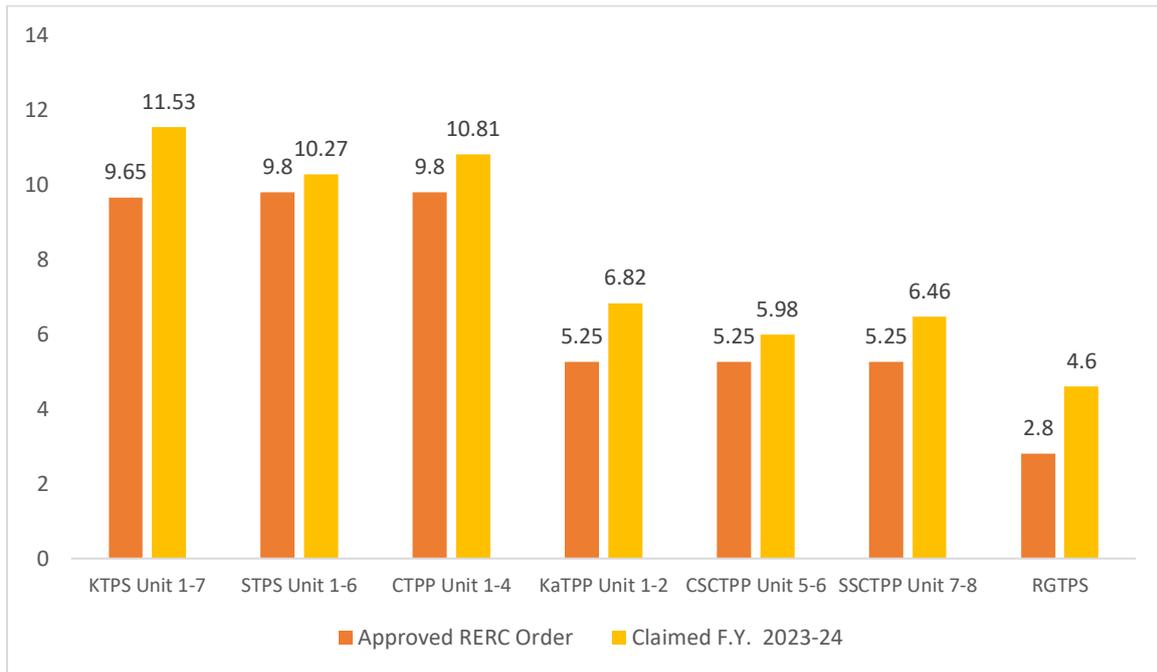


### 3.7. Auxiliary Consumption

The petitioner has requested approval of auxiliary consumption based on actuals, citing technical limitations as the reason for the increased auxiliary consumption. However, we would like to highlight that Section 2(b) of Regulation 9 of the RERC Tariff Regulations, 2019, clearly defines plant-wise auxiliary consumption as a controllable factor. Furthermore, Section (2) of Regulation 56 of the RERC Tariff Regulations, 2019, specifies that *"financial losses incurred by a Generating Company on account of Station Heat Rate, Auxiliary Consumption, and Secondary Fuel Oil Consumption shall be borne by the Generating Company."*

Acceptance of the petitioner's request for higher auxiliary consumption beyond the normative benchmark would lead to increased tariffs, thereby placing an additional burden on electricity consumers. In light of this, we urge the commission to disallow the petitioner's claim and consider auxiliary consumption strictly on a normative basis, in the broader public interest.

Figure 3: Auxiliary Consumption (%) for FY2023-24

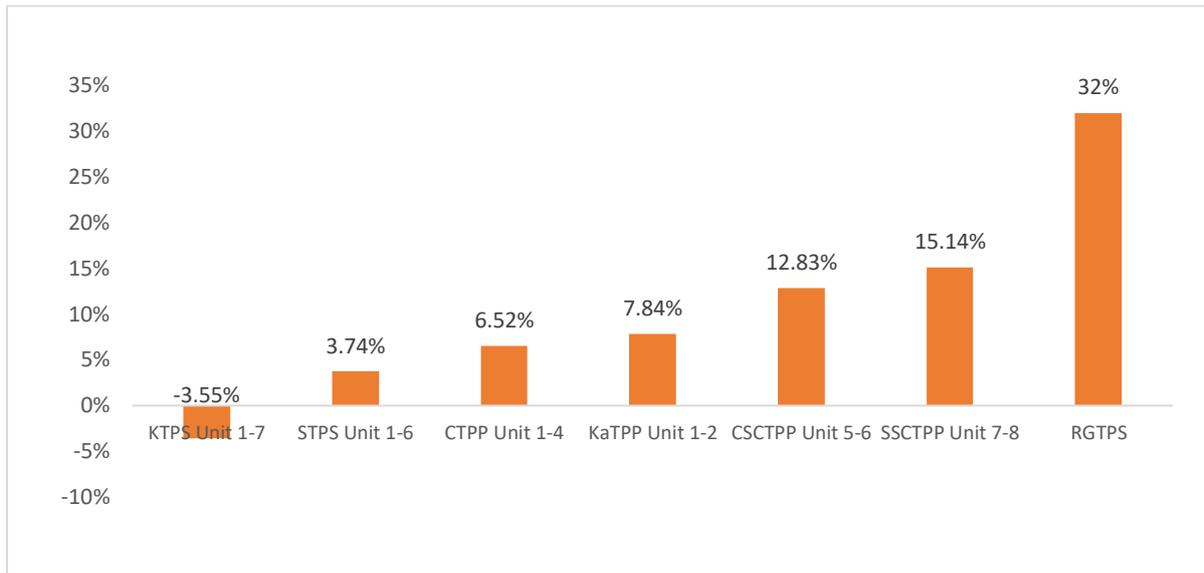


### 3.8. Station Heat Rate (SHR)

The Station Heat Rate (SHR) is a critical parameter that aligns with the design specifications of each plant, and the commission has prescribed normative levels for SHR for each facility. Any deviation—particularly an increase—from these normative values indicates inefficient operations and poor maintenance practices. Despite the petitioner claiming normative Operations and Maintenance (O&M) expenses across all plants, the SHR has significantly deviated from the benchmark, with the deviation reaching as high as 32% in the case of RGTPS. This escalation in SHR leads to increased coal consumption at the plant level, ultimately resulting in higher tariffs for end consumers. Therefore, we strongly urge the Hon’ble Commission to reject the petitioner’s request to accept a higher SHR and to adhere strictly to the normative SHR levels as defined in the RERC Tariff Regulations, 2019.

Additionally, we request the petitioner to provide plant-wise explanations for the deviations in SHR and furnish details of the corrective actions undertaken to address these inefficiencies.

Figure 4: Percentage Deviation (Increase) in SHR from approved for FY 2023-24



### 3.9. Total Consumption of Oil

It is submitted that the actual oil consumption deviates significantly from the approved levels, with the deviation exceeding 500% in the case of STPS. As per Regulation 9(2)(b) of the RERC Tariff Regulations, 2019, variations in secondary fuel oil consumption are classified as a controllable factor.

In light of this, we strongly urge the Hon'ble Commission to reject the petitioner's request to accept the excessive oil consumption beyond the approved levels. Additionally, the petitioner is requested to provide plant-wise explanations for the substantial deviations in oil consumption from the approved benchmarks.

Table 1: Deviation in Consumption of Oil, Approved vs Actual

Plant	%
KTPS Unit 1-7	-8.94
STPS Unit 1-6	563.93
CTPP Unit 1-4	42.34
KaTPP Unit 1-2	28.56
CSCTPP Unit 5-6	-32.80
SSCTPP Unit 7-8	-16.43

### 3.10. Coal Transit Loss and Handling Loss

The petition document uploaded by the commission lacks data pertaining to coal transit losses. We would like to draw the commission’s attention to significant discrepancies observed in the computation sheets—Form GT 5.1 on coal transit losses—based on data available on the RVUNL website.

Details of coal transit losses at KTPS for the period from October 2023 to December 2023, as per the petition available on the RVUNL website, are provided below for reference.

Figure 5: Coal transit losses at KTPS for the period from October 2023 to December 2023

Sl. No.	Description	Unit	Oct 2023	Nov 2023	Dec 2023	Total
1	Quantity of coal stock at beginning of the month	MT	97410.19	0.00	97410.19	97410.19
2	Quantity of coal supplied by coal/lignite company during the month	MT	548876.43	0.00	548876.43	548876.43
3	Adjustment (+) in quantity supplied made by coal company due to ... (to be mentioned specifically)	MT	0.00	0.00	0.00	0.00
4	Coal supplied by Coal company during the month (1+2-3)	MT	548876.43	0.00	548876.43	548876.43
5	Normative Transit/Handling losses @ 0.2% for the quantity at 4	MT	4399.01	0.00	4399.01	4399.01
6	Actual Transit/Handling losses for the quantity at 4	MT	-5492.03	0.00	-6227.76	-1165.06
7	Net coal supplied during the month (4-5-6)	MT	554075.44	0.00	554075.44	554075.44
8	Total coal / Receivers + Opening stock (1+5)	MT	646286.62	0.00	646286.62	646286.62
9	Coal/lignite consumed ... For generation of Firm power	MT	572809.76	0.00	572809.76	572809.76
10	Quantity of coal in stock at the end (7-8)	MT	79776.89	0.00	79776.89	79776.89
11	Value of coal in stock at beginning of the month	Rs Lakhs	4426.3503	0.00	4426.35	4426.35
12	Amount charged by coal company for the quantity at 4	Rs Lakhs	15491.34	0.00	15491.34	15491.34
13	Adjustment (+) in amount charged / made by coal company on account of ...					

Notably, for the months of April and May 2022, the actual transit/handling losses of coal at KTPS are recorded as “-5492.03 MT,” “-6227.76 MT,” and “-1165.06 MT.” The petitioner is requested to explain these negative transit losses and provide a detailed justification for the same.

## 4. COMPLIANCE OF COMMISSION’S DIRECTIVES

### 4.1. Mechanism for Fuel Price Determination

The commission, in its directive, has mandated the petitioner to obtain and submit specific approval from the Government of Rajasthan for determining the fuel price as per the Coal Mining and Delivery Agreement (CMDA). However, the petitioner has not included the CMDA in its petition, which is essential for understanding the pricing mechanism for fuel price determination. It is therefore requested that the petitioner submit the CMDA.

### 4.2. Submission of Coal GCV by Third Party Auditor

The commission has directed the petitioner to submit the Gross Calorific Value (GCV) of coal on both an 'As Received' basis and an 'As Fired' basis, along with a certification of the calculation of monthly weighted average GCV data. However, the petitioner has not provided certification for the calculation of the monthly weighted average GCV data or other critical details, which are essential for understanding coal quality assessment and management. Therefore, it is requested that the petitioner submit the following:

- Detailed information on the coal dispatch process and the procedures for quality checks at various points during supply, including loading, unloading, receipt, and firing, along with details of the parties responsible for measuring the GCV.
- Details of the agencies contracted for GCV measurement at various points and copies of the relevant agreements.
- A description of the duties and responsibilities of RVUNL personnel at each quality check point.
- A copy of the agreement with the third party appointed for coal GCV determination.
- Details of method for calculation of the monthly weighted average GCV data of coal.

#### **4.3. Safety Audit**

The commission, in its directive, has instructed the petitioner to conduct a safety audit for each plant and ensure that accidents are prevented from recurring. However, the petitioner has only submitted an internal order issued to various plants and has not provided any details regarding the audits. It is requested that the petitioner share relevant details and reports of any audits conducted. If such audits have not been carried out, the petitioner should be mandated to complete them within three months of the order.

#### **4.4. Performance Guarantee (PG) Test**

The commission, through its directive, has instructed the petitioner to conduct PG tests. In compliance with this directive, the petitioner has only provided information regarding the status of PG test execution but has not submitted any reports of the tests conducted. It is therefore requested that the petitioner submit all test reports to enable assessment of the performance of its electrotechnical equipment.

### **5. ISSUES RAISED BY THE INDEPENDENT AUDITORS**

The audited annual report for 2023-24, submitted by the independent auditor, highlights several issues concerning RVUNL's operations. It identifies critical gaps in RVUNL's functioning, and we request the Commission to take note of these concerns and direct the petitioner to take appropriate corrective actions. The key points raised by the independent auditor are outlined below:

#### **5.1. Property, plant and equipment and capital work in progress**

- RVUN has not carried out any techno-economic assessment to ascertain whether there is an indication that any asset is impaired which hinders ascertainment of financial impact of any un-assessed and unprovided impairment loss
- Capital work-in-progress from old outstanding works amounting to INR 40,414.86 Lakhs, is being carried over Y-to-Y without any accretion/adjustments. The auditors note that due to the absence of complete status, impairment loss cannot be ascertained.

- The auditor raised concerns that value of capital and O&M spares are not reconciled with value appearing in the store records. They also note that when these spares are used for their intended purpose, the units are not following the accounting policy for de-recognition of such items from PPE

## **5.2. Current financial assets:**

The company has reported an **expected credit loss** amounting to INR 47,059.69 Lakhs against the amount receivable from GLPL. The company's statutory auditors (not the independent auditors), however, have submitted that the company's net worth has significantly eroded and it has remained shut with persisting doubts of its revival. The independent auditors, therefore, note that they cannot comment on the adequacy of total **expected credit loss** amounting to INR 2,76,367.46 Lakhs.

## **5.3. Fly Ash Utilisation Fund**

The auditors have reported that RVUN, in violation of the MoEFCC Guidelines, utilised funds accumulated in the Fly Ash Utilisation Funds for its own purposes instead of development of infrastructure facilities.

## **5.4. Long Outstanding and Un-reconciled balances**

- Advances to Suppliers & Contractors amounting to INR 2484.96 Lakhs are reported as outstanding for an extended period of time with no clarification as to partwise details, and the nature and accuracy of the amount. The auditors note that recovery of amount in such a case is doubtful and not reporting the same in losses amounts to understatement of loss for the FY and overstatement of non-current assets.
- The auditors report that there is no reconciliation or system of confirmation of Fuel Related Receivables & Claims due amounting to INR 18,623.45 Lakhs from the Railways. The effect of amounts on the Financial Statement, therefore, cannot be ascertained.

## **5.5. Coal quality/quantity:**

RVUN has a system for reconciliation of the quality/quantity of coal ordered through store receipts and checks the grade of coal received. It has admitted that various claims in this regard have been made to the 'coal companies', but these have not been recorded in the books of accounts (as per RVUN's accounting policy).

## **5.6. Other Issues / Material Weaknesses**

- RVUN has not carried out any risk assessment and does not have a risk control matrix in place for various processes which may lead to weak checks and balances.
- Physical verification and assessment of assets.
- Internal mechanisms for reconciliation of payables
- Internal audits (which was yet to be carried out for FY24 as on date of external audit)

- RVUN carries out various accounting adjustments in Excel sheet software before recording it in Tally. It, however, does not make any declaration as to the implications of such practices on the integrity of the accounts.
- Quarterly returns or statements filed by RVUN with SBI are not in agreement with the books of account of the company:

*Table 2: Quarterly returns as per submissions to SBI against as per books of accounts*

Quarter	Statement Provided to the Bank (in Cr.)		Books of Accounts (in Cr.)	
	Coal Stock	Book Debts	Coal Stock	Book Debts
Q1	517.84	9780.00	397.32	10,914.66
Q2	392.41	1,033.00	411.03	1,485.13
Q3	457.79	1,571.00	341.52	1,526.55
Q4	506.03	1,739.00	490.51	2,319.49

# ANNEXURE-1 : EXHIBITS OF POORLY QUALITY PETITION DOCUMENTS

Figure 6: Page no: 133 from Petition – Coal Related Details

		May-23(Coal) month based											
		MAY			APRIL			MAY			APRIL		
		QTY	PRICE	AMOUNT	QTY	PRICE	AMOUNT	QTY	PRICE	AMOUNT	QTY	PRICE	AMOUNT
1	Quantity of coal in stock at beginning of the month	0.00	0.00	0.00	0.00	0.00	0.00	133000.00	0.00	0.00	133000.00	0.00	0.00
2	Quantity of coal supplied by vendors during the month (As per Bill of Materials & Invoices)	11.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3	Quantity of coal received by the company during the month (As per Bill of Materials & Invoices)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4	Quantity of coal consumed during the month (As per Bill of Materials & Invoices)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5	Quantity of coal in stock at the end of the month	11.00	0.00	0.00	0.00	0.00	0.00	133000.00	0.00	0.00	133000.00	0.00	0.00

Senior Accounts Officer  
KATPP, RAJNUL, Jharkhand

Figure 7: Page no: 148 from Petition – Details related with Chhabra Supercritical Thermal Power Project

Details/Information to be Submitted in respect of Fuel for Comparison of Energy Charges for PPAD/DM's ED Cost (Chhabra Supercritical Thermal Power Project (CSTPP 2460 MW), RAJNUL, Chhabra)																		
S.No.	Particulars	Unit	Apr-23			May-23			Apr-23			May-23						
			Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount				
1	Quantity of coal in stock at beginning of the month	MT	146,464.11	0.00	0.00	128,046.51	79,266.26	0.00	0.00	79,266.26	130,284.18	0.00	0.00	130,284.18	0.00	0.00	130,284.18	
2	Quantity of coal supplied by vendors during the month (As per Bill of Materials & Invoices)	MT	381,715.74	80,131.79	0.00	381,007.54	129,882.47	112,830.94	3.00	642,051.91	294,474.36	11,234.86	0.00	396,239.02	314,514.21	11,627.84	0.00	345,144.81
3	Quantity of coal received by the company during the month (As per Bill of Materials & Invoices)	MT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
4	Quantity of coal consumed during the month (As per Bill of Materials & Invoices)	MT	381,955.14	80,131.79	0.00	381,007.54	129,882.47	112,830.94	3.00	642,051.91	294,474.36	11,234.86	0.00	396,239.02	314,514.21	11,627.84	0.00	345,144.81
5a	Adjustment (+) in quantity supplied / made by coal company (As per Bill of Materials & Invoices)	MT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
5b	Adjustment (-) in quantity supplied / made by coal company (As per Bill of Materials & Invoices)	MT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
6	Total coal supplied during the month (As per Bill of Materials & Invoices)	MT	381,955.14	80,131.79	0.00	381,007.54	129,882.47	112,830.94	3.00	642,051.91	294,474.36	11,234.86	0.00	396,239.02	314,514.21	11,627.84	0.00	345,144.81
7	Total coal consumed during the month (As per Bill of Materials & Invoices)	MT	381,955.14	80,131.79	0.00	381,007.54	129,882.47	112,830.94	3.00	642,051.91	294,474.36	11,234.86	0.00	396,239.02	314,514.21	11,627.84	0.00	345,144.81
8	Quantity of coal in stock at the end of the month	MT	146,464.11	0.00	0.00	128,046.51	79,266.26	0.00	0.00	79,266.26	130,284.18	0.00	0.00	130,284.18	0.00	0.00	130,284.18	
9	Value of coal in stock at beginning of the month	Rs. In Lakhs	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
10	Value of coal supplied during the month (As per Bill of Materials & Invoices)	Rs. In Lakhs	30,615.18	76,662.54	0.00	30,615.18	76,662.54	9,185.99	0.00	9,185.99	29,474.36	1,135.55	0.00	30,615.18	76,662.54	1,135.55	0.00	30,615.18
11	Value of coal received by the company during the month (As per Bill of Materials & Invoices)	Rs. In Lakhs	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
12	Value of coal consumed during the month (As per Bill of Materials & Invoices)	Rs. In Lakhs	30,615.18	76,662.54	0.00	30,615.18	76,662.54	9,185.99	0.00	9,185.99	29,474.36	1,135.55	0.00	30,615.18	76,662.54	1,135.55	0.00	30,615.18
13	Value of coal in stock at the end of the month	Rs. In Lakhs	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
14	Value of coal supplied during the month (As per Bill of Materials & Invoices)	Rs. In Lakhs	30,615.18	76,662.54	0.00	30,615.18	76,662.54	9,185.99	0.00	9,185.99	29,474.36	1,135.55	0.00	30,615.18	76,662.54	1,135.55	0.00	30,615.18
15	Value of coal received by the company during the month (As per Bill of Materials & Invoices)	Rs. In Lakhs	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
16	Value of coal consumed during the month (As per Bill of Materials & Invoices)	Rs. In Lakhs	30,615.18	76,662.54	0.00	30,615.18	76,662.54	9,185.99	0.00	9,185.99	29,474.36	1,135.55	0.00	30,615.18	76,662.54	1,135.55	0.00	30,615.18
17	Value of coal in stock at the end of the month	Rs. In Lakhs	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
18	Total transportation charges during the month (14+15+16+17)	Rs. In Lakhs	5370.22	1284.28	0.00	4544.86	5713.99	2996.45	0.00	2996.45	5083.77	860.20	0.00	5370.22	1284.28	860.20	0.00	5370.22
19	Total amount charged for coal (As per Bill of Materials & Invoices)	Rs. In Lakhs	35,985.40	84,346.82	0.00	35,985.40	84,346.82	12,182.44	0.00	12,182.44	34,558.13	1,995.75	0.00	35,985.40	84,346.82	1,995.75	0.00	35,985.40
20	Average rate of coal (19/15+16+17)	Rs. In Lakhs/T	893.34	864.79	0.00	893.34	864.79	445.96	0.00	445.96	445.96	445.96	0.00	893.34	864.79	445.96	0.00	893.34
21	Quantity of coal in stock at the end of the month (20a)	MT	146,464.11	0.00	0.00	128,046.51	79,266.26	0.00	0.00	79,266.26	130,284.18	0.00	0.00	130,284.18	0.00	0.00	130,284.18	
22	Quantity of coal received by the company during the month	MT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
23	Quantity of coal consumed during the month	MT	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

Notes:  
 1. Data from Sl. No. 1 to 9 are to be made available by Fuel wing, CSTPP.  
 2. Data from Sl. No. 10 to 13 are to be made available by Accounts, CSTPP.  
 3. Data from Sl. No. 14 to 23 are to be made available by Office of SE Commercial and Chief Chemist, CSTPP, Chhabra.  
 4. Coal received from different coal sources is shown in CSTPP coal stock pert. to source where coal consumption is taken as percentage availability of source.  
 5. Coal Rates and GCV have been revised for the month of Apr-23 to Mar-2024 as per the latest available data.  
 6. The Information (Sl. No. 10 to 23) for the month of Apr-23 to Mar-2024 are tentative & subject to finalization.  
 7. Approval of competent authority has been received regarding transfer/adjustment of source wise difference of Jan-2023 & Feb-2023 coal quantity and its cost implication in the month of Sept.-2023, as the same was not transferred/adjusted by accounts in FY 2022-23. Copy of note sheet is also enclosed herewith for your study reference.

## ANNEXURE-2 : COPIES OF THE REPORTS ON ACCIDENTS

Hindi News / Local / Rajasthan / Sriganganagar / Suratgarh  
Dies In Thermal Power Plant

### थर्मल पॉवर प्लांट में श्रमिक की मौत: कन्वेयर बेल्ट में फंसने से दम तोड़ा, मुआवजे पर सहमति बनने के बाद कराया पोस्टमॉर्टम

सुरतगढ़ 5 महीने पहले



लंबी वार्ता के बाद मांगों पर सहमति बनी।

Source: <https://www.bhaskar.com/local/rajasthan/sriganganagar/suratgarh/news/worker-dies-in-thermal-power-plant-133510429.html>

### सुरतगढ़ थर्मल पावर प्लांट में श्रमिक की मौत, 50 लाख मुआवजे की मांग, धरने पर बैठे परिजन - Ruckus in Sri Ganganagar - RUCKUS IN SRI GANGANAGAR

Suratgarh Thermal Power Plant, श्रीगंगानगर के सुरतगढ़ थर्मल पावर प्लांट में श्रमिक की मौत पर बवाल हो गया. परिजनों ने ठेकेदार पर गर्मी से निपटने के लिए आवश्यक इंतजाम नहीं करने के आरोप लगाते हुए धरने पर बैठ गए. परिजनों ने 50 लाख रुपये मुआवजे की मांग की है.



मुआवजे की मांग को लेकर धरने पर बैठे परिजन (ETV Bharat Suratgarh)

f X 2 Min Read



By ETV Bharat Rajasthan Team  
Published : May 28, 2024, 10:26 PM IST

श्रीगंगानगर. जिले के सुरतगढ़ थर्मल पावर प्लांट में मंगलवार को एक श्रमिक की मौत हो गई, जिसके बाद कार्फ हो गया. श्रमिक के परिजनों ने ठेकेदार पर गर्मी से बचाव के लिए इंतजाम नहीं करने के आरोप लगाए और कहा कि लू

Source: <https://www.etvbharat.com/hi/!state/worker-dies-after-deteriorating-health-in-suratgarh-thermal-power-plant-protest-for-compensation-of-rupees-50-lakh-rjs24052807689>

छबड़ा धर्मल पॉवर प्लांट में 20 मी. ऊंचाई से गिरा • हत्या का केस दर्ज करने की उठाई मांग, रात लैने से किया इंकार, धरने पर बैठे मजदूर

## बॉयलर का मेंटनेंस कर रहे मजदूर की गिरने से मौत, विरोध में प्रदर्शन

भास्कर न्यूज़ छबड़ा

छबड़ा धर्मल पॉवर प्लांट में सुझाव देकर बॉयलर मेंटनेंस का कार्य करते समय करीब 20 मीटर की ऊंचाई से गिरने से 24 बर्षीय मजदूर की मौत हो गई।

इससे आक्रोशित परिवारों ने इसके लिए ठेकेदार की तस्करवाही को जिम्मेदार ठहराते हुए पीटगार्डन करवावे से इंकार कर दिया। मुकदमा अर्जियों को 50 लाख रुपए का मुआवजा व मजदूर की मौत के लिए निम्नोत्तर ठेकेदार व अधिकांशों के विरुद्ध हत्या का मामला दर्ज करने की मांग उठाई। सैटीटीवी में बॉयलर मेंटनेंस का कार्य कर रही एएसएस कर्मिनेशन के सुरक्षावहन बरारम मौला ने बताया कि निपामरगु निवासी जेठा लोधा (24) पुत्र श्रीलाल लोधा शुक्रवार

दोपहर करीब तीन बजे बॉयलर मेंटनेंस कार्य के लिए करीब 20 मीटर ऊंचाई पर कार्य कर रहा था। इस दौरान अचानक नीचे गिर गया। उसे छबड़ा चिकित्सालय लया, लेकिन रात में ही उसकी मौत हो गई। घटना की सूचना मिलते ही छबड़ा अस्पताल में बड़ी संख्या में लोग जमा हो गए। धर्मल प्रशासन की अनदेखी व ठेकेदार की तस्करवाही से मजदूर की मौत से आक्रोशित परिवार व मजदूरों ने मुकदमा अर्जियों को 50 लाख रुपए का मुआवजा देने की मांग की। देर रात तक एसटीएस की मौजूदगी में धर्मल अधिकांशों व परिवारों के बीच बातें चल रही थी। अस्पताल परिसर में एएसटीएस सुनील चौरा की मौजूदगी में सैटीटीवी के पंजाबल चौक जर्नलिस्ट केसी शिवान, सुभाषकर एलमी कर्म, सुदीप धर्मिल व परिवारों से सम्बन्धित की। उन्होंने ठेकेदार से भी बात की। इस पर ठेकेदार ने यहां ठेका चलते तक मुकदमा की फाईल को बंद करने का आश्वासन दिया। साथ ही निपामरगु



छबड़ा - घटना की सूचना मिलते ही अस्पताल के बाहर बड़ी संख्या में इकट्ठा हुए लोग।

मिलने वाली मुआवजा राशि में सहयोग करने व अपनी ओर से 5 लाख रुपए देने की बात करी। घटना से आक्रोशित लोग व परिवार लोगों पर अड़े रहे। इस दौरान भाजपा नगर अध्यक्ष सीपी गेरा, प्रधान हरिओम गगर, सचिव तितरा शर्मा, भूलेन सरपंच राहुल शर्मा, सुंद

का, एलवान गुर्जर, लालचंद सुमान भी मौके पर पहुंचे। लोगों के आक्रोश को देखते हुए छबड़ा, पाली, बरारम व छीयाबडी क्षेत्र में जाका बन्दगी का फैसला किया गया है। खबर लिखे जाने तक ससर्क चिकित्सालय परिसर में धर्मल प्रशासन के विरुद्ध नोक्याबी करते रहे।

### सेप्टी उपकरण भी नहीं दिए जाते

एएसएस कर्मिनेशन कंपनी में मुला मोरा लोधा के साथी व मित्र सुकुट मोला ने बताया कि ठेकेदार द्वारा मजदूरों को सेप्टी बेल्ट, हेल्मेट, जूते व जकरी संरक्षण नहीं दिए जाते, जबकि धर्मल अधिकांशों द्वारा भी इस ओर ध्यान नहीं दिया जाता। 20 मीटर ऊंचाई से गिरने पर घटना के समय कोई सुरक्षा उपकरण नहीं था। इसके दोनो पैर टूटकर भूखण्ड और पूरे शरीर की हड्डियां टूट गईं। उसके कान व भ्रूण से खून बहने लगा। उनका अंतोष्प है कि धर्मल प्रशासन की अनदेखी व तस्करवाही के चलते यहां ठेकेदारों द्वारा मजदूरों का शोषण किया जा रहा है।

### मुकदमा की फाईल दो माह की गर्भवती

मुकदमा की फाईल दो माह से गर्भवती है, वहीं उसकी तिला मां भी है। ऐसे में परिवार के सामने अर्थिक संकट खड़ा हो गया है। मौत की मौत की सूचना मिलने पर गांव में मासम छा गया और शम को चुनने तक नहीं जाले।

## ANNEXURE-3 : COPIES OF THE REPORTS ON ENVIRONMENTAL ISSUES AND VIOLATIONS

09/01/2021, 11:27

Kalisindh plant yet to address fly ash mgmt issues: Villagers - Times of India

Printed from  
THE TIMES OF INDIA

### Kalisindh plant yet to address fly ash mgmt issues: Villagers

TNN | Sep 18, 2024, 04:13 AM IST



Jaipur: A recent survey conducted by the Rajasthan State Pollution Control Board (RSPCB) has overlooked allegations that the Kalisindh Thermal Power Plant continues to breach its obligation to manage fly ash properly.

Previously, the RSPCB had penalised the govt-owned plant for causing environmental damage. However, villagers and environmentalists allege that the plant has shown little seriousness in addressing fly ash management issues, despite the penalty.

Environmental activist, Tapeshwar Singh, said, "Despite the plant taking no significant remedial measures, the RSPCB continues to invite objections and suggestions for the installation of a new 800MW unit. In Nov 2023, there was a stockpile of 5.72 metric tonne of fly ash, and the situation on the ground remains almost unchanged. Recently, three inspections were conducted by the RSPCB team—on April 30, June 26, and July 27, 2024—but key issues, including the stockpile in the revenue pond and the fly ash dyke, were ignored. The Pollution Control Board officials are supporting the plant at the cost of people's lives."

<https://timesofindia.indiatimes.com/city/jaipur/kalisindh-plant-yet-to-address-fly-ash-mgmt-issues-villagers/articleshowprint/113439004.cms>

1/3

Source: <https://timesofindia.indiatimes.com/city/jaipur/kalisindh-plant-yet-to-address-fly-ash-mgmt-issues-villagers/articleshowprint/113439004.cms>

Hindi News / Local / Rajasthan / Sriganganagar / Suratgarh

Thermal, Four Villages Of Rajasthan Migrated Due To Fear Of Ash, These Villages With TB, Crops Affected

**उड़ती राख से जमीनें बंजर: सूरतगढ़ थर्मल, राजस्थान के चार गांवों में राख के खौफ से पलायन, इन्हें टीबी वाला गांव, फसल प्रभावित**

श्रीगंगानगर  
1 वर्ष पहले

लेखक: बिर्जेन्द्र सिंह  
शेखावत



गांव सोमासर निवासी श्योनाथ।

Source: <https://www.bhaskar.com/local/rajasthan/sriganganagar/news/suratgarh-thermal-four-villages-of-rajasthan-migrated-due-to-fear-of-ash-these-villages-with-tb-crops-affected-130828949.htm>

## Agitating farmers gherao Suratgarh thermal plant for irrigation water



27 Jun-2022 02:45 AM

Written By: Sunil Sihag

Sri Ganganagar: Thousands of farmers surrounded the Suratgarh Thermal Power Plant on the demand for water in Sriganganagar. They gathered around the plant in hundreds of tractors. The farmers of the area have been demanding irrigation water for a long time. Due to this, the thermal plant was surrounded on Saturday.

TOP NEWS >



Punjab: BSF seizes illegal arms, ammunition in Ferozpur



Republic Day: No flights at Delhi airport from 10.20am to...

Source: <https://firstindia.co.in/news/india/agitating-farmers-gherao-suratgarh-thermal-plant-for-irrigation-water>

Saturday, January 20, 2024

 पत्रिका

जन-गण-मन यात्रा राष्ट्रीय राज्य ओपिनियन मनोरंजन वीडियो त

राम मंदिर स्वास्थ्य धर्म/ज्योतिष क्रिकेट बॉलीवुड ऑटोमोबाइल हॉट ऑन वेब



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### खुलासा: कोटावासियों की सांसों में जहर घोल रहा थर्मल पावर प्लांट, गंभीर बीमारियों के शिकार हो रहे लोग

कोटा | Published: May 14, 2018 11:10:55 am | Submitted by: Zuber Khan



कोटा थर्मल पावर प्लांट कोटावासियों की सांसों में जहर घोल रहा है। इसका खुलासा राजस्थान राज्य प्रदूषण नियंत्रण बोर्ड की जांच में हुआ है।

Source: <https://www.patrika.com/kota-news/air-pollution-in-kota-by-kota-super-thermal-power-plant-2796661/>

#### ANNEXURE-4: MONTH-WISE SO2 EMISSION FROM KALI SINDH TPP

Table 3: Month-wise SO2 emission from Kali Sindh TPP

S.No.	Month (Year 2024)	SO <sub>2</sub> (mg/Nm <sup>3</sup> )		
		Applicable Norm	Average Stack Emission (Unit -1)	Average Stack Emission (Unit - 2)
1	May	200	1118	1116.25
2	June	200	945.75	974
3	August	200	905.05	995.94
4	September	200	803.25	912.25
5	October	200	462.34	801.85
6	November	200	797.48	1042.93

Source: Monthly environment data submission to CEA