

Southern Power Distribution Company of Telangana Ltd. (TGSPDCL)



Responses to Objections / Suggestions

On

ARR for FY 2024-25 to FY 2028-29 & Tariff Filings Proposals of Retail Supply

Business for FY 2024-25

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17	Sri. D. Ramu , H.No.2-1-174 & 175, Rajput Residency, Old Ramalayam Road, Nallakunta, Hyderabad 500 044	
18	Sri. J Sriranga Rao , H.No.2-2-18/18/7, Flat No.503, Srilaxmi Solitude, DD Colony, Hyderabad 500 013	
19	Amber Anand Rao , H.No.3-117, Bhrahmana Palli, thadai, Kama Reddy, 503111.	
20	Sri. A Veerabhadra Rao , H.No.12-13-486/39/1, Street No.14, Lane No.6, Beside Balaji Apartment, Tarnaka, Secunderabad, Hyderabad 500 017	
21	Sri.G Vinod Kumar Rao , H.No.16-13-U.361, Plot No.361, Vasantha Nagar, Kukatpally, Hyderabad 500 085	
22	Sri. Madhuganti Sridhar Reddy , Plot No.504, H.No.2-1-174, 175, Rajputra Residency, Nallakunta,Hyd-44	
23	Sri. MadireddyRajireddy H.No.20-160/1/1/1,R B Nagar,NearPochammaTemple,Shamshabad, RR District 501218	

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26	<u>G Gajender Goud, S/o: Bheemaiah</u> 3-6, Nagerkunta Vill, Shabad Mdl, RR District	
27	<u>Satha Rao Ashok Reddy</u> , 1-80, Peddamuddunoor Nagarkurnool Village, 509412	
28	<u>Sri. P. Narasimha Reddy</u> , Nandikandi village, Sadasivpet Mandal, Sangareddy District 502306	
29	<u>Sri. Sangishetty Swamy</u> ,H.No.4-135, Nandi Vaddemanvillage,Bijinepally mandal, NGKL district 509215	
30	ITC Limited , Paper Boards and Speciality Papers Division, Divisional Headquarters: ITC Bhadrachalam house, 106, Sardar Patel Road, Secunderabad- 500003, Telangana, India	121 - 124
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33	G.R. Karunakar , Plot No.56, Lakshmi Mega Township,Ragannaguda, Abdullahpurmet, RR Dist, Hyderabad- 501510	148 - 150
34	Indian Energy Exchange Limited , Registered Office: C/O Avanta Business Centre, First Floor, Unit no. 114(a), D2, Southern Park, District Center, Saket-110017 Plot No – C001/A/1, 9th Floor, Max Towers Sector 16B, Noida, UP – 201 301	151 - 156

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1. Response to M. Venugopala Rao

Part-1

1	M. Venugopala Rao , Senior Journalist & Convener, Centre for Power Studies, H.No.1-100/MP/101, Monarch Prestige, Journalists' Colony, Serilingampally Mandal , Hyderabad - 500 032	
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	As per the Regulation No.2 of 2023, TGDISCOMs should have submitted the subject petitions and their petitions for distribution business for the 5 th control period before 31 st January, 2024. However, they have submitted the subject petitions on 18.9.2024 going by the date shown in the subject petitions. In other words, there is a delay of nearly seven months and 18 days. The reasons given by the DISCOMs for the avoidable delay are not justifiable. The DISCOMs were expected to submit their long-term load forecast, procurement plan, investment plan, etc., for the 5 th and 6 th control periods much before the FY 2024-25 to the Hon'ble Commission and got approval of the latter. The information required for the same should have been collected and used for the subject petitions also well in time. The need to analyse the financial impact in the DISCOMs due to Gruha Jyothi scheme of the GoTS arose only after it is notified by the latter, and, as such, that should not be a hindrance for preparing and submitting the subject petitions in time. Going by the said public	Reasons given for avoidable delay are not justifiable- The Hon'ble Commission has accorded the approval to the TGDISCOMs to file the ARR and FPT for RSB filings on annual basis for the first year of 5th Control Period i.e., FY 2024-25 after careful consideration of the submissions made by the TGDISCOMs. When the Regulation No.2 of 2023 was notified on 30.12.2023, the TGDISCOMs were seeking clarifications on certain clauses of the new MYT Regulation No.2 of 2023 as there was huge impact on the financials of the DISCOMs and also there was a change in regulatory regime because of which DISCOMs needed to collect additional data for preparing the petitions. then the TGDISCOMs have initiated the process of collecting the required data from

	<p>notices, inviting objections, suggestions and comments from interested public on the subject petitions, etc., it is clear that the Hon'ble Commission has condoned the avoidable delay</p>	<p>the various wings for which it took time. Subsequently, the Gruhajyothi Scheme was announced by the GoTG which further delayed the process of Filings of ARR. Meanwhile, Modal code of conduct came into force, due to which the TGDISCOMs could not file the ARR filings. The DISCOMs have not considered the approved load forecast, procurement plan, investment plan, etc., for the 5th Control Period because due to Rapid growth in the Demand, the TGDISCOMs have already crossed the Demand forecast of FY 2024-25 (as per approved Resource Plan & Business Plan for 5th & 6th Control periods) in FY 2023-24 itself. The DISCOMs have duly submitted the condonation of delay petition before the Hon'ble Commission stating these reasons.</p>
2	<p>Though the DISCOMs have maintained that they faced "certain difficulties," obviously, other than those they have explained, for submitting the subject petitions in time, they have not explained the same. The DISCOMs have also maintained that they "shall obtain formal approval from State Government for filing of ARR &</p>	<p>In view of the above difficulties explained above and also in obtaining the formal approval from the State Government, the TGDISCOMs could not file the petition in time.</p>

	Tariff Proposals for FY 2023-24.” Similarly, in obtaining “formal approval from State Government” for filing the subject petitions, etc., for the FY 2024-25 and the 5 th control period, there might have been considerable delay	
3	The very fact that the TGDISCOMs have requested the Hon’ble Commission “to request the Government of Telangana to fund the proposed revenue gap” for FY 2024-25 is indicative of the kind of evasive approach they are constrained to adopt, while getting formal approval of the GoTS for filing the subject petitions. Instead of getting a commitment from the GoTS for providing required subsidy to bridge the revenue gap as may be approved by the Commission for 2024-25, as a part and parcel of the formal approval they have got from the Government, that the DISCOMs are requesting the Commission to request the GoTS to provide required subsidy is nothing but shirking their responsibility of submitting their proposals as to how they would bridge the projected revenue gap. How much subsidy is to be provided and to which categories of the consumers is the responsibility and within the purview of discretion of the GoTS, not of the Hon’ble Commission	Based on the proposals of the filings of ARR of RSB by TGDISCOMs, the Hon’ble Commission will determine the revenue gap. Until the finalization of the revenue gap, the Discom could not do correspondence with the State Government seeking commitment of the subsidy. However, it is a general practice to address a letter to the State Government by the Hon’ble Commission seeking commitment of the subsidy by the GoTG or otherwise.
4	Public notices are issued, calling for submission of suggestions, objections and views, on 20.9.2024, in another four petitions also	The petitions for determination of ARR and FPT for approval for the remaining period of the current financial year to mitigate financial

<p>– ARR and wheeling charges for distribution business of the TGDISCOMs for the 5th control period in petition Nos. OP 13 of 2024 and IA 12 of 2024 (TGNDPCL) AND op Nos. 12 of 2024 and IA No.11 of 2024 (TGSPDCL), and for transmission business of TGTRANSCO in OP No.14 of 2024 and for SLDC activity in OP No.15 of 2024 for the 5th control period. The time given for filing submissions on all the six petitions, including the subject petitions, is up to 11.10.2024, i.,e., three weeks. Needless to say that the time given is not sufficient to study all the petitions, prepare meaningful and purposeful submissions and submit the same to the Commission. Public hearings on these petitions are scheduled on the 23rd and 24th October, 2024. In other words, from the last date of submissions, a period of 12 days is left for the licensees to send their responses to the objectors and the latter to study them and make further submissions before and during the public hearings. The DISCOMs have requested the Hon'ble Commission to approve their submissions to come into force from the first October, 2024. In other words, after completion of public hearings, the Hon'ble Commission will be left with just one week to prepare, finalise and issue its orders. Going by the experience over the years in issuing annual tariff orders, it is impossible for any Commission to prepare, finalise and issue</p>	<p>losses of the DISCOM. In view of the increase in power purchase cost from various power stations with which it has long-term PPA's.</p>
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its orders in the said six petitions within a week from the date of completion of public hearings, unless the drafts of orders are already prepared much before the public hearings and some incorporations are made thereafter. For the avoidable delay in submitting the said petitions by the licensees, it seems that the Hon'ble Commission is constrained to speed up the entire regulatory process within an unreasonably short period. Such a hurry will have its adverse impact on the quality and comprehensiveness of submissions by objectors, replies by the licensees and preparation of orders by the Commission. Therefore, we request the Hon'ble Commission to extend time for filing objections, etc., replying to the same by the licensees and holding public hearings at least by 15 days. This is all the more important in view of the kind of crisis, financial and technical, the licensees find themselves in as has been revealed in the white paper on power sector in Telangana released by the new government, appointment of an inquiry Commission on issues pertaining to Yadadri and Bhadradi projects and PPA with Chattisgarh DISCOM for supply of power to TGDISCOMs, in addition to several other issues which are not covered in the white paper and terms of reference of the said inquiry Commission. All such issues have and will continue to have a

	<p>bearing on the tariffs to be determined by the Commission and will have to be paid by the consumers at large and subsidy to be provided by the state government. All such issues need to be articulated in submissions to be made by knowledgeable and interested objectors and considered by the Hon'ble Commission for an effective regulatory outcome</p>	
5	<p>Both the DISCOMs have shown a total revenue gap of Rs.14244 crore - TGSPDCL Rs.5957 crore and TGNPDCL Rs.8287 crore. They have projected additional revenue through the proposed tariffs of Rs.1221 crore – SPDCL Rs.1028 crore and NPDCL Rs.193 crore. The Hon'ble Commission should have advised the DISCOMs and through them the GoTS to shelve their move to submit the said petitions belatedly and seeking issuance of its orders within an unreasonably short time, allowing them to come into force from 1st October, 2024, for a period of six months. When the Government is expected to provide a subsidy of Rs.13023 crore, going by the projections of the DISCOMs in the subject petitions, and subject to the revenue gap to be determined by the Commission, it should not be difficult for the new government to provide an additional subsidy of Rs.1221 crore for 2024-25 or less than that subject to the revenue gap to be determined by the Hon'ble Commission. There is a precedent,</p>	<p>The DISCOMs have proposed normal hike in the tariffs and not overburdened the consumers. To enable the DISCOMs to purchase power in order to provide reliable and quality supply, it is expected to obtain subsidy commitment from GoTG only after determination of revenue gap by the Hon'ble Commission and the Government may consider approving the subsidy commitment as per the Regulatory process.</p>

	<p>though unwarranted, of the TGDISCOMs not filing their ARR and tariff proposals for three consecutive financial years, with no regulatory remedy administered by the Hon'ble Commission. For another reason, shelving of filing the said petitions just for the second half of the FY 2024-25 is desirable. Though additional revenue of Rs.1221 crore is projected on account of the proposed tariffs for a period of six months, the additional revenue for a whole FY would be double that amount, i.e., Rs.2442 crore. In other words, for the FY 2025-26, a tariff hike will be in-built in advance in the tariff order for the second half of 2024-25, if the Commission approves the proposed tariffs, i.e., the DISCOMs will get an additional revenue of Rs.1221 crore during 2025-26, without showing a hike afresh, or even more, depending on increase in demand for the categories of consumers for whom the new tariffs are proposed in the subject petitions. In other words, consumers are sought to be hoodwinked about the real financial impact of the said tariffs proposed for a period of six months.</p>	
6	<p>For the reasons explained above, among others, I request the Hon'ble Commission to extend time for filing objections and suggestions in the said six petitions and for holding public hearings, if it is not inclined to give a piece of advice to the DISCOMs and GoTS to withdraw the petitions. If the Hon'ble</p>	<p>The Hon'ble Commission is requested to finalize the ARR and Tariff based on the filings of DISCOMs in order to overcome further financial burden on account of increase in power purchase cost experienced day to day</p>

	Commission proceeds with the regulatory process in the said six petitions, I request it to permit me to make further submissions before the due date and during the public hearings after studying replies of the licensees to my submissions and preparing further submissions	by the DISCOMs.
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Part-2:

1	M. Venugopala Rao , Senior Journalist & Convener, Centre for Power Studies, H.No.1-100/MP/101, Monarch Prestige, Journalists' Colony, Serilingampally Mandal , Hyderabad - 500 032					
S.No.	Summary of Objections / Suggestions					Response of the Licensee
1	1. TGDISCOMs have submitted the following projections for their distribution business for the 5 th control period:					No Comments
	2024-25 29	2025-26	2026-27	2027-28	2028-	
	SPDCL:					
	Total capex	4,794	5,785	7,194	7,180	7,504
	ARR (Rs.crore)	5,663	6,525	8,415	9,750	11,166
	Contracted capacity (MVA)	3,788	3,928	4,074	4,227	4,386
	Wheeling charges (Rs/kVA/month)					
		440	475	575	623	668
	NPDCL:					
	Total capex	1,584	1,947	2,887	2,667	2,731
	Capex (smart meters)	356	534	1,246	820	604
	ARR	3,714	4,167	5,272	5,922	6,608
	Contracted capacity	3,788	3,928	4,074	4,227	4,386

	<p>Wheeling charges 817 884 1,078 1,168 1,255</p> <p>For NPDCL, total capex includes capex for smart meters.</p> <p>Both SPDCL and NPDCL have projected availability of surplus power, in their ARR submissions for retail supply business for the 5th control period, as given hereunder (in MU):</p> <table border="1"> <tr> <td>SPDCL</td> <td>18,232</td> <td>30,635</td> <td>27,106</td> <td>25,195</td> <td>19,315</td> </tr> <tr> <td>NPDCL</td> <td>5,135</td> <td>12,307</td> <td>12,668</td> <td>13,381</td> <td>12,364</td> </tr> <tr> <td>Total</td> <td>23,367</td> <td>42,932</td> <td>39,774</td> <td>38,576</td> <td>31,679</td> </tr> </table>	SPDCL	18,232	30,635	27,106	25,195	19,315	NPDCL	5,135	12,307	12,668	13,381	12,364	Total	23,367	42,932	39,774	38,576	31,679	
SPDCL	18,232	30,635	27,106	25,195	19,315															
NPDCL	5,135	12,307	12,668	13,381	12,364															
Total	23,367	42,932	39,774	38,576	31,679															
2	<p>As per the capital expenditure projected by the DISCOMs, as approved in the distribution and resource plans for the 5th control period by the Commission, compared to SPDCL's projections, the contracted capacity and capex projections of NPDCL are very much lower. However, wheeling tariffs proposed by NPDCL are almost double the projections of SPDCL. Even if higher agricultural consumption of NPDCL compared to that of SPDCL is taken into consideration, it is to be examined in comparison with capex proposed by NPDCL whether such higher wheeling charges proposed by NPDCL are justified.</p>	<p>The wheeling charges for Discoms have been computed at an aggregate level by considering Discom's aggregate revenue requirement and contracted capacities.</p>																		
3	<p>In view of availability of abnormal quantum of surplus power during the 5th control period, as projected by the DISCOMs, it is to be clarified whether the projected surplus power also is taken into account for the contracted capacity projected by them. If so, addition of distribution network capacity and projected capital expenditure would be unwarranted, as such a capacity would become idle.</p>	<p>The surplus power shown is due to consideration of NAAAF & NAPLF of the power plants having long term PPA's and upcoming power plants. However, there is likely variation of availabilities and PLFs of the Plants. Telangana's power demand has been growing at rapid pace. For instance, as evident in the peak demand of</p>																		

		Hyderabad in FY 2024-25, it has registered one of the highest power demand by any of the Indian metropolitan cities. This clearly indicates that capacity augmentation works need to be kept in tune with the rapid growth in power demand which is primarily being driven by growth in service sectors. Hence it is reasonable to believe that capacities would not become idle going further.
4	In response to the query of the Hon'ble Commission, both the DISCOMs have agreed to recalculate their requirements for 90% of the capacities, as they have segregated assets for wheeling business and retail supply business in the ratio of 90:10, respectively. The Hon'ble Commission is expected to consider the revised projections submitted by the DISCOMs for their distribution business for the 5 th control period subjecting them to prudence check. As such, their projected ARR and wheeling charges should come down.	The revised projections which segregates the assets for distribution and retail supply business in the ratio of 90:10 has been submitted to the Honorable Commission for their consideration.
5	The DISCOMs have proposed aggregate distribution losses and charges irrespective of the voltage level, i.e., 33 kv, 11 kv and LT, on par with inter and intra-state transmission system to mitigate financial losses and requested the Hon'ble Commission to approve the same. I request the Hon'ble Commission to examine the following points, among others:	The proposal for moving towards uniform wheeling charges and losses similar to the systems adopted by inter state and intra state

	<p>a) Determination of aggregate distribution losses and charges irrespective of the voltage levels would increase burden of consumers drawing power at higher KV level. In other words, consumers at higher levels of KV will have to cross subsidise consumers at lower KV levels, in addition to the cross subsidy, if any, they are paying already as a part and parcel of the tariffs being determined by the Commission.</p> <p>b) It is an accepted principle, reality and standard practice that distribution losses and distribution costs at different levels of KV are different. That is the reason why successive Commissions have been determining different wheeling charges at different levels of KV.</p> <p>c) If the principle of uniformity proposed by the DISCOMs is acceptable and accepted, then, the same principle should be implemented for working out cost of service to all categories of consumers in the entire state, irrespective of the level of KV at which they are being served.</p> <p>d) The contention of the DISCOMs that notification dated 17th January, 2024, on formula for computation of wheeling charges, with the proviso that the appropriate Commission may determine the wheeling charges at different voltage levels separately, is only a suggestion by MoP, GoI, and not mandatory is untenable. The very fact that the MoP, GoI, is constrained to issue the said notification, as a matter of correction to its notification dated 10.1.2024, within one week, itself is an admission that its first notification is deficient and does not recognize the authority of the Hon'ble Commission.</p>	<p>transmission system would lead to a simplified tariff structure, bring in transparency in billing process and would help in streamlining the process of grid planning going further. This would also help in improving administrative efficiency and lead to better resource allocation and lesser disputes related to undue variations in wheeling charges being levied on consumers.</p> <p>Further with distributed generation picking up pace, every consumer going further would become a prosumer and voltage wise segregation for levying wheeling charges may be of very little significance.</p> <p>As part of Retail Supply Business is concerned, the losses are considered as per respective voltage levels and the CoS was arrived.</p>
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	<p>Section 79.2 of Regulation No.2 of 2023 of TGERC says: “provided further that the Wheeling Charges shall be determined separately for LT voltage, 11 kv voltage, and 33 kv voltage, as applicable.” The Commission is expected to follow its Regulation, unless it is amended.</p>	<p>However, for the Distribution business, the Uniform wheeling losses and charges are arrived which are applicable for the consumers intend to opt open access system. Hence, this proposal does not effect the retail supply consumers of the Discom.</p>
6	<p>In support of their proposal for uniform wheeling charges, the DISCOMs have contended that</p> <ul style="list-style-type: none"> a) The roof-top solar installations are increasing at a rapid pace under Net Metering/Gross Metering/PM Surya Ghar schemes launched by Gol. As such when the consumer loads under such metering are low, the surplus power generation will flow in reverse direction to 11 kv system. b) B) In PM-KUSUM Comp-‘C’, the solar power plants of capacities 0.5 to 2 MW are coming up in 11 kv system at rapid pace. During non-agriculture loads periods, the solar power generated will flow in reverse direction to 33 kv system. c) In PM-KUSM Comp-‘B’, Grid tied Solar pump sets, during the periods of non-operation of solar pump sets after yielding crops, the solar power generated will flow in reverse direction to 33 kv system. 	<p>Intermittency of power generation prevalent with RE technologies such as solar and wind are inherent in nature due to externalities such as weather conditions, time of day, time of season etc. However, RE power projects are known for lower levelized cost of tariffs which can help Discoms in optimizing its power purchase cost, the benefits of which shall be passed on to the consumers of Discoms. Further, with Government of India’s vision of increasing the share of RE consumption in India’s consumption</p>

<p>d) Reduction in the cost of the Solar Panels and rules and regulations framed by the Government are encouraging the installation of Solar power plants and is increasing rapidly and there is a possibility of reverse flow of the power from 11kv to 33 kv system.</p> <p>e) Hybrid Solar and Wind system are coming up leading to continuous generation of power and there is a possibility of Reverse flow of power during the periods of Low-loads.</p> <p>f) Battery Energy Storage System may come up under LT and 11 kv systems and there is a possibility of reverse flow of power during the periods of Low-loads from 11 kv to 33 kv system.</p> <p>g) Under the above stated conditions of distributed power generation scenarios, the Distribution Losses will increase and the Licensee will always face High Energy Losses in the Network burdening with high Network Cost.</p> <p>These are some of the issues, and there are many more problems, both technical and financial, with renewable energy, connected with intermittence and integration of RE with the grid. We had made elaborate submissions on the problems associated with RE, in our submissions made earlier on the proposals of RPPO made by the Commission and in our other submissions made earlier. Governments and the DISCOMs are not concerned with such problems and</p>	<p>mix will lead to increased RE uptake going further. The Discoms have factored in all of the above scenarios as currently we are in a cusp of energy transition with more focus on sustainability. Hence, with distributed generation expected to garner pace in the medium to long run, Discoms have proposed for uniform wheeling tariffs similar to the regime adopted with intra-state and inter-state transmission systems.</p>
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	<p>additional burdens, when long-term PPAs are entered into with developers and middle-man public utilities of the GoI like SECI and NRVNL for purchase of RE indiscriminately, and they extol the virtues of RE, international commitments given by Prime Minister Modi on adding RE, need for environmental protection, etc. What has constantly been ignored is the need for maintaining equilibrium to the extent technically practicable between demand curve and power mix, when entering into long-term PPAs and regulatory consents to the same are being given. When, as a result of implementing the policies of the GoI, problems with RE are arising, GoTS and its DISCOMs should demand the GoI to compensate them for the same, instead of penalizing the consumers by imposing avoidable additional burdens on them.</p>	
7	<p>DISCOMs should have submitted details of the problems that have been faced as a result of purchasing unwarranted RE under long-term PPAs during the 4th control period like backing down thermal power and paying fixed charges for the same in order to purchase high-cost and must-run RE and purchasing power at higher costs in the market to meet peak deficit as RE cannot meet it.</p>	<p>No, thermal power plants have been backed down for the drawal of power from the RE Plants under long term PPAs during the 4th Control Period. However, to meet the peak demand the Discom purchased the power from the short term sources in critical times.</p>
8	<p>GoTS, its DISCOMs and the Commission are expected to take a holistic and balanced view when entering into, or giving consents to, PPAs with new power plants, especially RE units, in order to ensure balance between demand curve</p>	<p>The Discom has entered long term PPAs with mix of contracts including RE to optimize the power purchase</p>

	<p>and power mix to the extent technically practicable. Such an approach is imperative when targets under RPPO are determined. Interests of the state should be important and outweigh the declarations or notifications of the GoI. Availability of abnormal quantum of surplus power, unwarranted quantum of RE and the financial and technical problems associated with them are indicative of the failures of commission and omission in this regard on the part of the powers-that-be, as experience over the years has been proving.</p>	<p>cost. The surplus power are only intermittent due to variation in the Demand, seasonal factors. The Discom has sold the surplus power in the market whenever the price is more than the average variable cost of the power plants with which it has tied up agreements.</p>
9	<p>DISCOMs should have submitted consolidated and comprehensive account of their distribution business during the 4th control, giving details of expansion of network, capital cost incurred, results achieved vis a vis targets, whether they exceeded expenditure approved by the Commission, surplus power backed down and fixed charges paid therefor, etc. Similarly, they should have submitted details of their achievements or otherwise of various targets under other capex and results thereof. Also, the DISCOMs should have submitted consolidated details of their claims for true-up or true-down for the 4th control period. Examination of all these would help examine and determine requirements for the 5th control period and issuing MYT order by the Hon'ble Commission in a realistic manner. This is all the more necessary, as, compared to growth in contracted capacity projected for the 5th control period, growth in expenditures, ARR and wheeling charges is relatively higher. So is the case, when all these factors projected are compared with those of the last year of the 4th control period, i.e., 2023-24.</p>	<p>The Discoms have already filed the APRs for Distribution business upto 4th year of the 4th Control period and the Hon'ble Commission passed the order after prudence check up.</p> <p>The proposed asset additions for the 5th Control Period has been estimated on the basis of the growth in demand/sales, and the required infrastructure to support such growth in sales. Further, the Licensee submits that the proposed asset additions would be capitalized as per prevailing regulations / norms and the</p>

		same will be reflected in the true-up's for the respective time period.
10	<p>2. For smart meters, TGNPDCL has projected an expenditure of Rs.3560 crore for the 5th control period. TGSPDCL has not shown it separately. The Hon'ble Commission has already directed the DISCOMs to take steps for installation of prepaid smart meters with latest technology for "all interested consumers." At the same time, the Commission also directed the DISCOMs to submit "a time bound action plan for replacement of existing meters with prepaid smart meters with two way communication in the interest of revenue realisation of the DISCOMs." If prepaid meters are to be installed for "all interested consumers," it is left to the discretion of the consumers. Then, where is the need for a time-bound action plan for replacement of existing meters with prepaid smart meters? How many consumers have consented for installation of pre-paid meters? I once again request the Hon'ble Commission to reexamine the following points, among others:</p> <p>a) This move is to be seen in the background of the so-called reforms being imposed on the states by the Modi government for privatising power sector, and in conjunction especially with privatisation of power distribution and implementation of the direct benefit transfer (DBT) scheme. Implementation of RDSS, including installation of pre-paid meters, is to benefit the private operators, who will be permitted to take up power distribution in areas of their choice, as proposed by the Gol.</p> <p>b) It is obvious that, the purpose of installing pre-paid meters is to force the consumers of power to pay in advance for power to be consumed by them, contrary to the standard practice over the decades of paying power bills monthly/bi-monthly for the power consumed by them. What is wrong with</p>	Installation of smart meters / replacement of existing energy meters with smart meters is a measure that will bring in more efficiency in Discoms' billing and collection process. This will ultimately lead to better service delivery by Discoms and ultimately the benefit for the same will be passed on to the consumers. As smart meters installation is a country wide exercise being done basis guidelines / policy measures by Ministry of Power, Government of India, it is apt that TGDIscoms budget the capital expenditure that would be incurred for smart meters installation for its consumers. The Smart meters will also help the consumers to monitor

	<p>the present post-paid arrangement and what is the benefit and to whom with pre-paid arrangement under the proposed smart meters is left unexplained by its sponsors.</p> <p>c) As proposed by the Gol, private operators will be permitted to use the existing transmission and distribution networks of the DISCOMs of the government, paying some nominal rentals for carrying on their distribution business. In other words, they need not invest the amounts required for establishing their own distribution network, make arrangements for its maintenance, etc.</p> <p>d) Allowing private operators to use distribution network of the DISCOMs or rather, forcing the DISCOMs to allow private operators to use their network on lease, with DISCOMs themselves maintaining the network, is nothing but forcing the latter to lose a considerable part of their business, especially cross-subsidising component, to private operators, who get the opportunity to cherry-picking. Will the Gol apply this Tuglaquian approach to allow utilisation of such networks of private companies in this manner, for example, utilising the network of private telecom companies by others?</p> <p>e) The protagonists of pre-paid meters are arguing that pre-paid arrangement is there for cell phones. Then, why not similar arrangement for power consumption also, they ask. First, there is post-paid arrangement for cell phones and landlines. Second, under pre-paid arrangement for a specific period, there is no limit on number of calls that can be made. In the case of power consumption, consumers have to pay for the entire power they consume in a month; they are not allowed to consume any number of units of power during a specified period, pre-paying a specified amount.</p> <p>f) The DISCOMs have a grace period of one month to pay bills to generators/suppliers of power for the power supplied by them and even rebate if they pay before the grace period. Under the existing arrangement, consumers are being given a period of 14 days from the date of issuing the</p>	<p>their real time consumption and billing pattern. It will also help in peak load management with the participation of consumers voluntarily and avoid high power purchase cost from short term sources by the Discoms. Enabling the smart meters in the prepaid mode will help the Discoms to realize the revenue and avoid arrears.</p>
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bill for paying their bills for power consumed by them in a month. If payment of monthly bill is delayed, exceeding the due date, penalty is being collected by the DISCOMs, besides disconnecting the service. Moreover, all the permissible expenditure and return on equity for supplying power to consumers from the point of generation to end point is being passed through in the form of tariffs to be paid by the consumers. When such is the case, why should the consumers be forced to pay in advance for power to be consumed by them under the arrangement of pre-paid meters?

- g) As per applicable Regulation, “security deposit amount shall be two months charges in case of monthly billing and 3 months charges for bi-monthly billing.” In addition to collecting such a security deposit from the consumers, the DISCOMs also are collecting additional security deposit whenever the consumers exceed their contracted load. Then why should the consumers be forced to pay in advance for power to be consumed by them under the arrangement of pre-paid meters?
- h) Payment in advance for power to be consumed by the consumers is nothing but providing investment for private distribution company to purchase of power. Private distribution companies need not take loans for their working capital and they can retain the amount paid in advance by the consumers and use as they like till they have to pay for power purchased by them from generators/suppliers. In other words, private operators of distribution need not invest any amounts for developing and maintaining distribution network and for purchasing power. Arrangement of pre-paid meters is intended for bestowing this undue benefit to private operators.
- i) The works proposed to be taken up under RDSS need to be, and are being, taken up by the DISCOMs as a part and parcel of expanding, strengthening and maintaining their distribution network. For that no conditionalities, as imposed under RDSS, are required. The grant component under RDSS is a ruse to impose conditionalities like installation

of pre-paid meters to ensure undue benefits to private operators of distribution of power.

- j) Whatever money the DISCOMs spend for purchasing and installing pre-paid meters is nothing but squandering public money, whether it is collected from the consumers concerned or spent from the grant under RDSS. The consumers have already spent their money for their existing meters. Forcing them to pay for pre-paid meters is nothing but imposing additional burden on them without any benefit to them.
- k) The scheme of pre-paid meters benefits their manufacturers. Experience in power sector, as elsewhere in other sectors, shows that terms and conditions of bidding can be manipulated to select bidders of their choice by the powers-that-be. Bidding procedures and terms and conditions issued by the Gol have been found to be wanting in ensuring transparency and fair play, going by the way crony capitalism is being promoted and pampered. It is reported that crony capitalists, who have been promoted and pampered by the Gol, have already entered into manufacturing of pre-paid meters.
- l) There will be practical problems to consumers for paying in advance for power to be consumed by them under the system of pre-paid meters. How much amount and how many times they have to pay in a month, keeping track of their consumption recorded in the pre-paid meter to avoid disconnection and mode of such payment will be problematic to the consumers.
- m) Under smart pre-paid meter, if a consumer does not pay after the existing balance exhausts, his service connection will be disconnected automatically. If a consumer does not pay power bill before due date under the existing post-paid arrangement, his service will be disconnected after due date. The DISCOMs are unable to disconnect service connections of offices of the government and its instrumentalities and local

	<p>bodies, whatever be the reasons. Even under pre-paid meter system, there is no guarantee that the DISCOMs would not come under pressure not to disconnect services of offices of the government, its instrumentalities and local bodies for their default in paying power bills. It is ironical that, when the GoTS is failing in getting power bills paid by its offices, its instrumentalities and local bodies in time and itself failing in paying the committed subsidy to the DISCOMs in time, it is decided to install pre-paid meters to service connections of power consumers.</p> <p>n) When the GoTS is vehemently and rightly opposing the direction of the Gol for installing meters to all agricultural service connections, why are the DISCOMs moving in the direction of installing pre-paid smart meters to non-agricultural service connections?</p> <p>o) Neither the governments, nor the Central Electricity Authority, nor the DISCOMs, nor ERCs have any power to direct installation of pre-paid meters, without willingness of the consumers concerned to take the same. Section 47(5) of the Electricity Act, 2003, says, “A distribution licensee shall not be entitled to require security in pursuance of clause (a) of sub-section (1) if the person requiring the supply is prepared to take the supply through a pre-payment meter.” Directions or orders of the authorities cannot override the applicable law. Has the Hon’ble Commission given its approval to the DISCOMs for procurement of pre-paid meters, and, if so, with what conditions? If consumers do not opt for pre-paid meters, what will the DISCOMs do with the pre-paid meters purchased or to be purchased by them?</p> <p>We once again request the Hon’ble Commission to examine the above-mentioned submissions, among others, and responses of the DISCOMs thereto and direct them not to proceed with implementation of installation of pre-paid meters to service connections of consumers of power in the state, without the</p>	<p>The Discoms have proposed to take up the segregation of agriculture feeders under RDSS for better monitoring and accounting of agriculture consumption.</p>
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	consumers opting for the same.	
11	<p>3. As per the MYT Regulation No.2 of 2023, TGDISCOMs should have filed the subject petitions for the 5th control period before 2nd January, 2024. However, they have submitted the subject petitions on 19.9.2024 going by the date shown in the subject petitions. In other words, there is a delay of nearly seven months and 17 days. The reasons given by the DISCOMs for the avoidable delay are not justifiable. We request the Hon'ble Commission to consider the following points:</p> <p>a) TG DISCOMs submitting their filings for distribution business for the 4th control period on 16.12.2019 and the Hon'ble Commission passed its orders on 29.4.2020 "after comprehensive public consultation process on the filings," it is explained in the subject petitions. Similarly, the DISCOMs should have submitted the subject petitions on or before 2.1.2024, as directed by the Hon'ble Commission in its letter dated 22.11.2023. The Hon'ble Commission rejected twice the requests of the DISCOMs to extend time for filing their petitions for the 5th control period. Even while considering, in its interim order dated 15.3.2024, on interlocutory applications filed by the DISCOMs for continuation of existing retail supply tariffs for retail supply business, wheeling tariffs and wheeling losses for distribution business as applicable on 31.3.2024 pending disposal of the petitions finally, the Hon'ble Commission directed the DISCOMs to file their regular petitions for determination of ARR and retail supply tariffs, CSS, wheeling charges and losses for the 5th control period "immediately." However, going by the said public notices, inviting objections and suggestions from interested public on the subject petitions, etc., it is clear that the Hon'ble Commission has condoned the avoidable delay in filing the</p>	<p>The Hon'ble Commission had passed the MYT Regulation No. 2 of 2023 on 31st December 2023 in which a new regulatory regime was proposed and there were changes introduced in the calculation methodology as well as introduction of new tariff components. With so many changes introduced, it would be impractical for TG Discoms to adopt to the new regulatory regime, collect the necessary data required for computation of new line items in the ARR and file for proposed tariffs within 3 days (2nd January 2024) of new regulation passed.</p> <p>a) TG Discoms have filed the condonation of delay petition before the Hon'ble Commission with all the reasons stated. The</p>

	<p>subject petitions, etc.</p> <p>b) Having got the approval of the Hon'ble Commission for their capital investment plan in resource plan for the 5th control period, the DISCOMs should have filed the subject petitions, etc., well in time, since they have claimed that they have filed the same "based on a comprehensive analysis of state of the existing network loading conditions and the expected future loading of the network during each year of the 5th control period based on the projected load growth on 01.04.2023."</p> <p>c) Public notices given on eight petitions - four of the TGDISCOMs, including the subject petitions, two of TGTRANSCO and SLDC, one of CESS Limited, Sircilla, and another one of TGGENCO for for true-up for FY 2022-23 and MYT for the 5th control period, that the same period of three weeks for filing objections and suggestions is overlapping. These petitions and additional information submitted to the Commission run into hundreds of pages. Moreover, the DISCOMs, on the direction of the Hon'ble Commission have issued public notices with corrigendum which are published in selected newspaper on 26.9.2024. It has been the standard practice that a time of four weeks used to be given for filing objections and suggestions on ARR and tariff proposals of the DISCOMs alone. Now that just a period of three weeks is given for filing suggestions and objections in eight petitions, i.e., two and a half days per petition on an average! Needless to say that it is impossible to study the petitions and related issues, analyse them and prepare submissions in a meaningful, comprehensive and purposeful manner for any informed and serious objector for filing the same within</p>	<p>decision for accepting/ rejecting the condonation of delay petition rests solely with the Hon'ble Commission</p> <p>b) TG Discoms have mentioned the reasons in the Condonation of Delay petition filed before the Hon'ble Commission</p> <p>c) The timelines for filing of objections rests solely with the Hon'ble Commission. Moreover, Hon'ble Commission has also additionally allowed admission of further objections during the time of public hearing.</p>
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the unreasonably short period given.

While the last date for filing objections and suggestions is 11.10.2024, public hearings are scheduled from 21 to 25th October, 2024. The GoTS and its DISCOMs and other utilities know full well that the Hon'ble Chairman and Members of TGERC are going to retire on the 29th October, 2024. In other words, after completing public hearings, the Hon'ble Commission is left with just four days to finalise and issue its orders on all these petitions! How did the GoTS and its power utilities expect the Hon'ble Commission to complete its due regulatory process on all these petitions within such a short period with "comprehensive public consultation process on the filings" is inexplicable and incomprehensible. MYT Regulation, 2023 says : "The Commission shall, within one hundred and twenty (120) days from admission of the Petition, and after considering all suggestions ad objections received from the public: a) issue a Tariff Order accepting the Petition with such modifications or conditions as may be stipulated in that Order" (section 10.1(a)). This has been the position in the earlier regulations also and practice over the years. It is obvious that all these petitions are filed belatedly, deliberately, erroneously, incompletely, defying the applicable regulations and directions of the Hon'ble Commission and almost simultaneously with an intent to get the entire regulatory process stifled, without adequate time available to the objectors and the Hon'ble Commission, if orders are to be issued before retirement of the Hon'ble Chairman and Members.

12	<p>The intent of the Hon'ble Commission might be to see that orders are given in the said petitions before retirement of the Hon'ble Chairman and Members so that new tariffs come into force, may be, from 1st November, 2004. But the reality is that, with the approvals given by the Commission permitting the DISCOMs to collect tariffs during 2024-25 as per the tariffs fixed by it for the FY 2023-24 till the petitions concerned are disposed of finally, they have been collecting tariffs accordingly so far, may be, with subsidy being released by GoTS every month, and will continue to do so till new tariffs come into force, if the present Commission gives orders required. New tariffs have to come into force with prospective effect, not with retrospective effect, as has been the standard practice over the years. In other words, if at all the Commission gives its orders in the said petitions before retirement of its present incumbents, the new tariffs will be applicable for a period of five months from 1st November, 2024. Even if orders are not given accordingly in extraordinary hurry, making the regulatory process a mere formality for the reasons explained above, the applicant utilities will have the option of claiming true-ups next year for the five-month period also, as they may do for the first seven-month period. The DISCOMs filed true-up claims accordingly for a period of seven years, including the three consecutive years for which they were not allowed by the then TRS government earlier to file their ARR and tariff proposals. Even if the Commission does not take up the eight petitions for consideration and give its orders, collection of tariffs, as already permitted by the Commission will continue till the end of 2024-25. Therefore, it is desirable</p>	<p>The Hon'ble Commission is requested to finalize the ARR and Tariff based on the filings of DISCOMs in order to overcome further financial burden on account of increase in power purchase cost experienced day to day by the DISCOMs.</p>
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	<p>that the Commission leave the regulatory process to be conducted in the said eight petitions by successors of its present incumbents. MYT regulation, 2023, says that the Commission shall “reject the Petition for reasons to be recorded in writing if such Petition is not in accordance with the provisions of the Act and the rules and Regulations made thereunder or any other provisions of law, after giving the Petitioner a reasonable opportunity of being heard.” Here, it is not rejection of the said petitions, but postponement of the regulatory process to be taken up by the new Commission, for the reasons that the petitions are filed belatedly, defying regulations and directions of the Commission, and that time required for the regulatory process to be completed in a meaningful and fruitful manner is absolutely inadequate.</p>	
13	<p>Both the TGDISCOMS have shown an estimated revenue gap of Rs.13,373 crore for the FY 2023-24 - SPDCL Rs.10,060 crore and NPDCL Rs.3313 crore – without even collecting the FSA amounts permitted by the Commission. However, they have not filed petitions for true up of the same. When the GoTS and its DISCOMs feel that there is no urgency for filing true-up petitions for the huge revenue gap estimated by the DISCOMs for the last financial year, the urgency for new tariff orders for a period of just five months during 2024-25, that, too for an additional revenue of Rs.1221 crore for the whole FY, in an extraordinary hurry giving go-by to requirements of regulatory process as per applicable regulations and making the regulatory process a formality, is questionable.</p>	<p>The filings of true up application would be filed separately along with Annual Performance Review of Distribution Business for FY 2023-24. Moreover, any tariff changes proposed in the FY 2024-25 Tariff order would only be prospective in nature.</p>

14	<p>It may be noted, in this connection, that filings for ARR and tariffs for FY 2025-26 have to be filed by 30th November, 2024. The GoTS knows the date of retirement of the Hon'ble Chairman and Members of the Commission and need for appointing new Chairman and Members in time to facilitate functioning of TGERC as a continuous process. The process for appointment of Chairman and Members should be started six months before vacancies for these posts arise. However, there is no indication that GoTS has started such a process. If new Chairman and Members are not appointed in time, the Commission will become defunct till such appointments are made, as happened for a considerable period of time during the then TRS regime.</p>	<p>The GoTG has appointed the new chairman for TGERC.</p>
15	<p>I once again request the Hon'ble Commission to give a piece of advice to GoTS and its power utilities to withdraw the said petitions or leave the regulatory process on the petitions to be taken up by the successor Commission in all fairness to facilitate a comprehensive study and analysis of the issues both by the interested public and the Commission as a part and parcel of its regulatory process in a meaningful and fruitful manner. I request the Hon'ble Commission to consider the above-mentioned submissions in conjunction with my earlier submissions dated September 23, 2024, filed in OP No. 16 of 2024 and IA No.15 of 2024 and OP No.17 of 2024 and IA No.16 of 2024 relating to ARR and tariff proposals of the TGDISCOMs for the 5th control period.</p>	<p>The TGSPDCL is continuously striving for providing the reliable and quality supply 24X7 hrs. In order to mitigate the financial losses of the Discom and to enable the Discom to procure power for supply, the Hon'ble Commission is requested to approve the petitions and pass the Tariff Order.</p>

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Part-3

15	M. Venugopala Rao , Senior Journalist & Convener, Centre for Power Studies, H.No.1-100/MP/101, Monarch Prestige, Journalists' Colony, Serilingampally Mandal , Hyderabad - 500 032																						
S.No.	Summary of Objections / Suggestions		Response of the Licensee																				
1	<p>1. TGDISCOMs have made the following projections for 2024-25:</p> <table border="1"> <thead> <tr> <th>DISCOM</th> <th>ARR</th> <th colspan="2">Addl. Rev. through</th> </tr> <tr> <th>Rev/gap (Rs.crore)</th> <th></th> <th colspan="2">proposed tariff</th> </tr> </thead> <tbody> <tr> <td>TGSPDCL</td> <td>40,788</td> <td>1,028</td> <td>4,929</td> </tr> <tr> <td>TGNPDCL</td> <td>17,069</td> <td>193</td> <td>8,093</td> </tr> <tr> <td>Total</td> <td>57,857</td> <td>1,221</td> <td>13,022</td> </tr> </tbody> </table> <p>If the Hon'ble Commission approves the tariffs as proposed by the DISCOMs, in all probability the new tariffs will come into force from 1st November, 2024. In such a case, the DISCOMs can recover the additional revenue on account of proposed tariff for the whole FY within a span of five months. In other words, the DISCOMs can collect an additional revenue of 140% during the next financial year 2025-26 over and above the projected additional revenue for 2024-25, without showing any tariff revision afresh. For a whole FY, the additional revenue would work out to Rs.2,930.4 crore and that would be the real impact of the proposed tariff revisions. Depending on</p>		DISCOM	ARR	Addl. Rev. through		Rev/gap (Rs.crore)		proposed tariff		TGSPDCL	40,788	1,028	4,929	TGNPDCL	17,069	193	8,093	Total	57,857	1,221	13,022	<p>The TGSPDCL has filed petitions in accordance with the Regulation No. 2 of 2023 for determination of ARR & tariff for the Retail Supply Business & Distribution Business by the Honorable Commission to enable the Discom for purchase of power and supply to the consumers.</p>
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	<p>growth in demand of the consumers to whom the tariff revisions are proposed in the subject petitions, the additional revenue for 2025-26, without any fresh revision of tariffs, would be more than Rs.2,930.4 crore.</p>																																																																					
	<p>2. Both SPDCL and NPDCL have projected requirement of power and availability of surplus power, in their ARR submissions for retail supply business for the 5th control period, as given hereunder (in MU):</p> <table border="1" data-bbox="394 537 1167 1268"> <thead> <tr> <th></th> <th>2024-25 2027-28</th> <th>2025-26 2028-29</th> <th>2025-27</th> </tr> </thead> <tbody> <tr> <td>Requirement :</td> <td></td> <td></td> <td></td> </tr> <tr> <td>SPDCL</td> <td>63,036</td> <td>67,021</td> <td>74,542</td> </tr> <tr> <td>82,647</td> <td>91,541</td> <td></td> <td></td> </tr> <tr> <td>NPDCL</td> <td>23,248</td> <td>24,193</td> <td>25,177</td> </tr> <tr> <td>26,328</td> <td>27,469</td> <td></td> <td></td> </tr> <tr> <td>Total</td> <td>86,284</td> <td>91,214</td> <td>99,719</td> </tr> <tr> <td>1,08,975</td> <td>1,19,010</td> <td></td> <td></td> </tr> <tr> <td>Availability of surplus:</td> <td></td> <td></td> <td></td> </tr> <tr> <td>SPDCL</td> <td>18,232</td> <td>30,635</td> <td>27,106</td> </tr> <tr> <td>25,195</td> <td>19,315</td> <td></td> <td></td> </tr> <tr> <td>NPDCL</td> <td>5,135</td> <td>12,307</td> <td>12,668</td> </tr> <tr> <td>13,381</td> <td>12,364</td> <td></td> <td></td> </tr> <tr> <td>Total</td> <td>23,367</td> <td>42,932</td> <td>39,774</td> </tr> <tr> <td>38,576</td> <td>31,679</td> <td></td> <td></td> </tr> <tr> <td>As percentage of Requirement</td> <td>27.08</td> <td>47.06</td> <td>39.88</td> </tr> <tr> <td>46.40</td> <td>26.62</td> <td></td> <td></td> </tr> </tbody> </table>		2024-25 2027-28	2025-26 2028-29	2025-27	Requirement :				SPDCL	63,036	67,021	74,542	82,647	91,541			NPDCL	23,248	24,193	25,177	26,328	27,469			Total	86,284	91,214	99,719	1,08,975	1,19,010			Availability of surplus:				SPDCL	18,232	30,635	27,106	25,195	19,315			NPDCL	5,135	12,307	12,668	13,381	12,364			Total	23,367	42,932	39,774	38,576	31,679			As percentage of Requirement	27.08	47.06	39.88	46.40	26.62			<p>Noted.</p>
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	<p>I request the Hon'ble Commission to examine the following points: a) Availability of this abnormal quantum of surplus power is</p>	<p>Energy dispatch from Chhattisgarh State</p>																																																																				

	<p>projected, without considering availability of power from Chattisgarh State Power Distribution Company Limited. The DISCOMs have maintained that, “A judicial committee has been appointed to investigate power procurement from CSPDCL station. Hence, power has not been scheduled from CSPDCL plant I in the current control period.” The reality is that, in view of dispute on billing amounts for power supplied by CSPDCL and huge dues pending from TGDISCOMs, CSPDCL has stopped supply of power. Appointment of inquiry Commission by GoTS has not prohibited the TGDISCOMs from scheduling power from CSPDCL.</p>	<p>Power Distribution Company Limited (CSPDCL) has been suspended due to ongoing disputes from FY 2022-23 and the Licensee is currently not scheduling any dispatch from CSPDCL.</p> <p>Further, considering that CSPDCL has stopped supply of power to TGDISCOMs, it is prudent to consider availability / dispatch from stations where the DISCOM is reasonably certain that any scheduled energy dispatch will be promptly supplied.</p>
	<p>b) DISCOMs have also not considered availability of power from Neyveli new units I and II.</p>	<p>The energy availability for the station has not been projected in the Approved Resource Plan for the 5th Control Period. Further, the share of TGDISCOMs from Neyveli new unit I and II was relinquished vide letter dated 29.03.2022 which was accepted by M/s NLC. Hence, the same has not been considered.</p>
	<p>c) DISCOMs have projected availability of 13399 MU for 2024-25 from NCE sources against 17505 MU considered by the TGERC, based on actual energy dispatched from NCE sources for the last two financial years. In other words, if the NCE units with whom the DISCOMs had PPAs generate and supply power as per the</p>	<p>The availability of surplus power is intermittent due to variable demand. The power generation from the NCE sources depends widely on the weather and seasonal</p>

	<p>capacity utilization factors approved therein or even more than that, availability of surplus power would increase further.</p>	<p>conditions. The projection of the power from NCE sources is based on the normative availability factor and CUF(Capacity Utilisation Factor).</p>
	<p>d) The DISCOMs have maintained that they “would put forward best endeavors to procure additional RE energy (as per CEA Resource Adequacy study) to meet the RPPO obligations.” Needless to say that the DISCOMs have to follow the RPPO order in force issued by TGERC. Resource adequacy study made by the Central Electricity Authority should not be the basis for procuring “additional RE energy.” In view of availability of projected surplus power during the 5th control period, GoTS, its DISCOMs and TGERC should be doubly cautious in taking decisions or giving orders for procurement of additional RE. DISCOMs have to give a factual account of fulfilling or exceeding their obligations under the RPPO in force during the 4th control period. Having entered into long-term PPAs with RE/NCE units, and as approved by the Commission, if those units fail to generate and supply power as per the CUF approved, the fault lies with them, not with the DISCOMs. The problem of intermittence by its very definition being volatile, generation and supply of power by RE units need not and cannot be uniform for all the years. Therefore, based on trends of generation and supply of power by RE units for the last two financial years, the DISCOMs cannot project availability of RE during the 5th control period from the same RE units. Moreover, in view of the problems being, and likely to be, faced with integration of RE with the grid, as narrated by TGDISCOMS themselves in their filings on their distribution</p>	<p>The Discoms would strive to optimize its power procurement quantum and cost so that all regulatory compliances can be met and consumers are not unduly burdened.</p>

	<p>business for the 5th control period in favour of their proposal for introducing uniform wheeling charges, irrespective of voltage levels, and various other problems arising on account of RE explained in a report submitted by an expert committee appointed by the very CEA, the powers-that-be should be doubly cautious about going in for procuring additional RE. The higher the unwarranted procurement of RE, the higher the imbalance between demand curve and power mix, with adverse consequences, both technically and financially.</p>											
	<p>e) While SPDCL has projected open access sales of 406.44 MU for 2024-24, NPDCL has claimed that it does not contain any third party open access sales for 2023-24 and as such, revenue from cross subsidy surcharge and additional surcharge is zero. Similarly, NPDCL has not projected any open access sales and CSS and AS for 2024-25. If open access sales increase, availability of surplus power to the DISCOMs also will increase, but the latter can get cross subsidy surcharge and additional surcharge.</p>	<p>For FY 2023-24, NPDCL does not have any third party open access sales and has not claimed any revenue from CSS and AS. The future projections in open access sales for NPDCL is based on the historical and present scenario. Going further if open access sales increase, NPDCL can realize revenue from cross subsidy surcharge and additional surcharge</p>										
	<p>3. In their resource plans, load forecasts, distribution plans and procurement plans for the 5th control period, both the DISCOMs had submitted the following projections:</p> <table border="1" data-bbox="304 1266 1260 1429"> <thead> <tr> <th></th> <th>2024-25</th> <th>2025-26</th> <th>2026-27</th> <th>2027-28</th> </tr> </thead> <tbody> <tr> <td>Energy availability MU</td> <td>121754</td> <td>127451</td> <td>127126</td> <td>2028-29</td> </tr> </tbody> </table>		2024-25	2025-26	2026-27	2027-28	Energy availability MU	121754	127451	127126	2028-29	<p>The availability of power plants has been determined based on existing PPAs while the Resource Plan considers availability includes other sources including CSPDCL, Sembcorp etc. which causes a variation in energy availability.</p>
	2024-25	2025-26	2026-27	2027-28								
Energy availability MU	121754	127451	127126	2028-29								

	<p style="text-align: center;">126658 122090</p> <p>Energy require- ment MU 84997 89768 94774</p> <p style="text-align: center;">100285 105957</p> <p>Surplus/deficit 36758 37683 32352 26374</p> <p style="text-align: center;">16133</p> <p>For its transmission business for the 5th control period, TGTRANSCO has submitted the following projections:</p> <p>Energy availability to TGDISCOMs MU 95,753 106,637 106,157</p> <p style="text-align: center;">105,506 102,784</p> <p>Energy requirement 83,058 87,564 92,365 97,482</p> <p style="text-align: center;">102,942</p> <p>Surplus/deficit 12,696 19,073 13,793 8,024</p> <p style="text-align: center;">-158</p> <p>Based on additional information submitted by the TGDISCOMs, TGTRANSCO had revised its projections for its resource plan for the 5th control period, drastically reducing the abnormal availability of surplus power shown earlier as hereunder:</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 15%;"></th> <th style="width: 15%; text-align: center;">2024-25</th> <th style="width: 15%; text-align: center;">2025-26</th> <th style="width: 15%; text-align: center;">2026-27</th> <th style="width: 15%; text-align: center;">2027-29</th> <th style="width: 15%; text-align: center;">2028-29</th> </tr> </thead> <tbody> <tr> <td>Energy availability</td> <td style="text-align: center;">93191</td> <td style="text-align: center;">100071</td> <td style="text-align: center;">99840</td> <td style="text-align: center;">99136</td> <td style="text-align: center;">96449</td> </tr> <tr> <td>Energy requirement</td> <td style="text-align: center;">90587</td> <td style="text-align: center;">94885</td> <td style="text-align: center;">00371</td> <td></td> <td></td> </tr> <tr> <td></td> <td style="text-align: center;">104310</td> <td style="text-align: center;">109354</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Surplus/deficit (MU)</td> <td style="text-align: center;">2604</td> <td style="text-align: center;">5186</td> <td style="text-align: center;">409</td> <td style="text-align: center;">-5174</td> <td style="text-align: center;">-12905</td> </tr> </tbody> </table> <p>How these projections have been changed repeatedly is not explained by the DISCOMs and authenticity of such changes and projections becomes questionable.</p>		2024-25	2025-26	2026-27	2027-29	2028-29	Energy availability	93191	100071	99840	99136	96449	Energy requirement	90587	94885	00371				104310	109354				Surplus/deficit (MU)	2604	5186	409	-5174	-12905	
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	<p>4. Going by the projections of availability of surplus power</p>	<p>The DISCOM undertakes power purchase</p>																														

	<p>during the 5th control period, as submitted in the subject petitions, how anarchic the decisions of the DISCOMs on procurement of power vis a vis requirement to meet demand, obviously, at the behest or permission of GoTS, can be understood. Even if some variations take place in the said projections, substantial surplus power will have to be backed down and hundreds of crores of Rupees will have to be paid towards fixed charges for the capacities backed down.</p>	<p>based on Merit Order Dispatch principles and has been undertaken considering the must-run status of RE sources, minimum thermal load for thermal plants, etc. based on requirement.</p> <p>The availability of surplus power is 3-5% of the availabilities only. No unwarranted fixed costs are paid and also the backing down of the power plants depends on the demand.</p> <p>Further, The surplus power shown is due to consideration of NAAAF & NAPLF of the power plants having long term PPAs and upcoming power plants. However, there is likely variation of availabilities and PLFs of the Plants.</p>
	<p>5. While SPDCL has projected other short-term purchases to the tune of 4,163 MU for 2024-25, NPDCL has projected the same to the tune of 881 MU. In other words, despite projection of availability of abnormal quantum of surplus power, the DISCOMs could not plan power mix to be in tune with fluctuating demand curve. As a result, to meet peak deficit, they have proposed short-term purchases.</p>	<p>The short term power procurement has been determined on the basis of Hourly demand and available energy source to meet that demand for each hour. In peak hours and peak month the available dispatch from tied up sources is not enough to meet demand (in</p>

		<p>MW) and hence market purchase are considered to meet demand (in MW). Similarly, during non-peak months, available dispatch from tied-up sources is higher than demand and the state will have Surplus energy.</p>
	<p>6. As a result of the desultory and unrealistic planning for procurement of power and entering into long-term power purchase agreements indiscriminately, GoTS and its DISCOMs have been creating a precarious situation wherein avoidable burdens of paying hundreds of crores of Rupees for backing down thermal power and purchasing high-cost power in the market. It has been leading to claiming and imposing avoidable burdens on the consumers in the form of true-up claims. Moreover, both the DISCOMs have not proposed sale of surplus power for the FY 2024-25. In view of obligations to purchase must-run and high-cost renewable energy, on the one hand, and backing down thermal power as per the principle of merit order dispatch, on the other, experience has been proving that it is very difficult to sell surplus power, at least, on no-loss and no-profit basis. It is because surplus power is always with higher fixed costs and variable cost may also be higher. Even when surplus power could be sold by the DISCOMs, the quantum is very insignificant vis a vis its abnormal availability.</p>	<p>The power purchase is considered based on demand growth anticipated in the future and PPAs have been entered based on such anticipated demand. No power plants have been backed down due to surplus power. If power plants have been backed down due to technical reasons, the fixed charges have been paid to the generators.</p> <p>The DISCOM undertakes power purchase based on Merit Order Dispatch principles and has been undertaken considering the projected energy requirements. The decision of purchasing short term power is based on market dynamics.</p>
	<p>7. GoTS, its DISCOMs and the Commission are expected to take</p>	<p>The DISCOM will strive to ensure that the</p>

	<p>a holistic and balanced view when entering into, or giving consents to, PPAs with new power plants, especially RE units, in order to ensure balance between demand curve and power mix to the extent technically practicable. Such an approach is imperative when targets under RPPO also are determined. Interests of the state should be important and outweigh the declarations or notifications of the GoI. It is the state which has to reap the benefits or burdens of such decisions, not the GoI. Availability of abnormal quantum of surplus power, unwarranted quantum of RE and the financial and technical problems associated with them are indicative of the failures of commission and omission in this regard on the part of the powers-that-be, as experience over the years has been proving.</p>	<p>PPAs with new plants will be undertaken with the purpose of balancing demand curve to ensure stability of the grid while striving to optimize the cost of power purchase.</p>																									
	<p>8. DISCOMs have projected quantum and cost of power purchase for the last and current financial years as given hereunder:</p> <table border="0" data-bbox="394 954 1264 1247"> <thead> <tr> <th>DISCOM</th> <th colspan="2">2023-24</th> <th colspan="2">2024-25</th> </tr> </thead> <tbody> <tr> <td>SPDCL</td> <td>61460 MU</td> <td>Rs.33395 crore</td> <td>62036 MU</td> <td></td> </tr> <tr> <td></td> <td>Rs.31023 cr.</td> <td></td> <td></td> <td></td> </tr> <tr> <td>NPDCL</td> <td>25243</td> <td>13686</td> <td>23248</td> <td></td> </tr> <tr> <td></td> <td>11679</td> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>While SPDCL has projected an increase of 576 MU in power purchase and of decrease of Rs.2372 crore in cost of power purchase, NPDCL has projected a decrease of 1995 MU in</p>	DISCOM	2023-24		2024-25		SPDCL	61460 MU	Rs.33395 crore	62036 MU			Rs.31023 cr.				NPDCL	25243	13686	23248			11679				<p>The DISCOM undertakes power purchase based on Merit Order Dispatch principles and has been undertaken considering the projected energy requirements.</p> <p>The reduction in power purchase cost is due to excess hydel generation due to good monsoon in the current financial year.</p> <p>In the filings of FY 2024-25, the licensee has considered the power availability of hydel plants due to good monsoon as compared to</p>
DISCOM	2023-24		2024-25																								
SPDCL	61460 MU	Rs.33395 crore	62036 MU																								
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	<p>power purchase and of Rs.2007 crore in power purchase cost for 2024-25 over 2023-24. Going by the past trends, these projections seem unrealistic, especially based on highly reduced requirement of short-term power purchases for the current financial year compared to 2023-24. As a result, expenditures and revenue requirement of the DISCOMs, need for tariff hike and subsidy from the government tend to be lower, leading to claims under true-up for a huge amount for 2024-25 later. The purchases of power and its cost for both the DISCOMs and the amounts for which true-up claims have to be made for the first half of the current financial need to be submitted by the DISCOMs and examined by the Commission, besides making them public, to have a realistic assessment.</p>	<p>the last 4 years and thereby reduction of the power purchase cost. As there is increase in the generation of hydel power the discoms stopped taking power from short term purchase and reduced PP cost</p>
	<p>9. SPDCL has shown a reduction of intra-state transmission charges from Rs.2670 crore for 2023-24 to Rs.2095 crore for 2024-25, while NPDCL has shown a reduction from Rs.1126 crore for 2023-24 to Rs.875 crore for 2024-25, as per the projections made by TGTRANSCO. It indicates that the contracted capacity for 2024-25 must have come down from the last financial year to the current financial year based on the above-mentioned unrealistic projections. At the same time, SLDC charges are projected to increase from Rs.33 crore for 2023-24 to Rs.59 crore for 2024-25 for SPDCL and from Rs.14 crore to Rs.25 crore for NPDCL. Similarly, distribution cost is projected to increase from Rs.5168.36 crore for 2023-24 to Rs.5663 crore for 2024-25 for SPDCL and a reduction from Rs.4081.42 crore to Rs.3714 crore for NPDCL. As a result, SPDCL has projected a reduction in aggregate revenue requirement from Rs.43336 crore for 2023-24 to Rs.40788 crore for 2024-25 and NPDCL has shown a reduction from Rs.19732 crore to Rs.17069 crore for the same years. To the</p>	<p>The licensees have considered Intra-State transmission charges as per the filings made by TG TRANSCO. Further, the licensees have determined ARR for 5th Control period following the principles of MYT Regulation 2 of 2023.</p>

	<p>extent these projections turnout to be underestimates, the burdens under true-up on consumers would increase.</p>	
	<p>10. TGDISCOMs have pointed out that, due to change in regime from long-term access (LTA) to general network access (GNA) the monthly inter-state transmission charges of PGCIL have increased in December, 2023. GNA is an irrational arrangement and arbitrary and the DISCOMs are expected to resort to legal recourse questioning such arbitrary decisions. On earlier occasions, we raised the issues relating to GNA and are not repeating the same now. Compared to PGCIL charges for 2023-24, which were higher, the DISCOMs have shown a decrease for 2024-25 and increases for subsequent years of the 5th control period. SPDCL has shown PGCIL charges of Rs.1624 crore for 2024-25 against Rs.1714 crore for 2023-24. NPDCL has shown PGCIL and ULDC cost for 2024-25 of Rs.678 crore against Rs.716 crore for 2023-24. What is the basis for projection of such reductions for 2024-25? These projections also may turn out to be underestimations. The DISCOMs have considered a 5% escalation every year for projection of PGCIL charges from 2025-26 to 2028-29. We request the Hon'ble Commission not to permit such advance escalation on annual basis.</p>	<p>The monthly PGCIL transmission charges for DICs are being calculated by Grid Controller of India basis a pre-defined formula as per the CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022 and its subsequent amendments. The monthly transmission charges released by Grid controller of India got changed in the month of December-2023. Till November-2023, Telangana's monthly PGCIL charges have been computed considering an LTA demand/injection of 3,884 MW. However, from December-2023 onwards Telangana's monthly PGCIL charges have been computed considering a GNA quantum of 5,801 MW as per the order released by Grid Controller of India dated 25.11.2023. Hence, the licensee has considered average of monthly PGCIL charges from December-2023 to March-2024 for computation of PGCIL charges for FY 2024-25. For projection of PGCIL charges from FY 2025-26 onwards a nominal escalation of 5% is considered as there is no historical data for PGCIL charges under GNA regime.</p>
	<p>11. For the FY 2023-24 the DISCOMs have shown an estimated revenue gap of Rs.13,373 crore – SDCL Rs.10,060 crore and</p>	<p>The licensee will file true-up petitions separately before the Hon'ble commission</p>

	<p>NPDCL Rs.3,313 crore - which they would claim under true-up. Going by this trend, and unrealistic projections of various items shown in the subject petitions by the DISCOMs, claims for true-up for the FY 2024-25 may again turn out to be abnormal.</p>	<p>after prudence check of its costs</p>
	<p>12. SPDCL has maintained that revenue from additional surcharge for FY 2024-25 is derived by considering the sales as 203.27 MU (assuming 50% sales would be from green energy open access consumers which are exempted from paying additional surcharge) and considering the additional surcharge rate of Rs.1.40 per unit as per approved order for H1 for 2024-25 and additional surcharge rate of Rs.1.60 per unit (as per filings for H2 for FY 2024-25). If the GoI has exempted green energy open access consumers from paying additional surcharge, GoTS and its DISCOMs should demand the GoI to reimburse the additional surcharge they have to forego because of such exemption. Hon'ble Deputy Chief Minister, Sri Bhatti Vikramarka has stated that the government would go ahead with a target of generating 40,000 MW of green power by 2034 out of which 20,000 MW would be generated in the next five years. Its pros and cons need to be examined realistically. Quoting relevant clauses of Regulation No.1 of 2024 specifying the terms and conditions of open access issued by TGERC, SPDCL pointed out that the Hon'ble Commission notified the Regulation without determining the standby charges wherever applicable to the green energy open access consumers. Moreover, the Hon'ble Commission issued the order on determination of additional surcharge for H1 of</p>	<p>The discoms made the filings to recover its fixed cost commitments as per PPAs in phased manner and thereby avoid the losses due to stranded capacities arising due to switching of consumers to open access. As a first measure, the discoms have proposed increase in FC of high end domestic consumers and other commercial and industrial category consumers of HT and LT</p>

	<p>2024-25 by exempting the Green Energy Open Access consumers from the levy of additional surcharge due to which TGDISCOMs are unable to recover the stranded charges from green energy open access consumers, the DISCOM has explained. While exempting green energy open access consumers from payment of additional surcharge, the Commission did not specify who should bear the loss thereof. The submission of the DISCOM that it is inevitable to levy standby charges to the green energy open access consumers as per Regulation 1 of 2024 is justified. The Hon'ble Commission should consider the proposal of the DISCOM to recover stranded charges from green energy open access consumers so that the burden of loss that accrues on account of exempting green energy open access consumers from paying additional surcharge is not imposed on other consumers.</p>	
	<p>13. The DISCOMs have proposed to increase fixed demand charge to certain categories of consumers. However, they have not explained the reasons and justification for the same. Therefore, the proposal should be rejected by the Hon'ble Commission.</p>	<p>In the current tariff structure only 30% of the fixed cost is being recovered through fixed charges. The fixed charges constitute the fixed revenue of DISCOMs and are not reflective of the fixed costs incurred by them. Hence the DISCOMs request the Hon'ble Commission to approve the proposed tariffs.</p> <p>Moreover, the projected Average Cost of Supply for FY 2024-25 for the licensee is higher than approved Average Cost of Supply</p>

		for FY 2023-24. In order to ensure cost recovery, the licensees have proposed to increase in tariff in light of increase of costs
	<p>14. While proposing different rates of cross subsidy surcharge to different categories of consumers, SPDCL has pointed out, quoting consultation paper on issues pertaining to open access issued by MoP, GoI, in August, 2017, that, in case the consumer tariff is more than 120% of average cost of supply, DISCOM will not be able to recover losses through cross subsidy surcharge in case consumer opts for open access. Therefore, the DISCOM has requested the Hon'ble Commission not to restrict the cross subsidy surcharge at 20% of tariff payable by the consumer, as the tariffs are not within +/-20% average cost of supply.</p>	No comments
	<p>15. TGDISCOMs have considered an annual escalation of 3% on actual variable costs for FY 2023-24 for the 5th control period. Since the DISCOMs have been allowed by the Hon'ble Commission to collect @ 30 paise per unit per month under FSA, and raise true-up/true-down claims on quarterly basis, proposal of the DISCOMs for advance annual escalation in variable costs should not be allowed. The DISCOMs have not been collecting FSA as permitted by the Commission, nor are they raising true-up/true down claims in time, obviously, at the behest of the governments of the day. Such impermissible procrastination would cause problems to the DISCOMs, the consumers and the government - in the form of accumulated deficits for the DISCOMs, in the form of accumulated</p>	<p>The Objectioners point has been noted. The Licensee has considered a nominal escalation rate of 3% for escalating variable cost.</p> <p>The DISCOMS have been regularly addressing letters to the GoTG regarding FCA charges and also seeking instructions for levy and collection of FCA charges on all categories of consumers in terms of regulation No. 1 of 2023.</p>

	<p>burdens with carrying cost, if the Commission permits, to the consumers, and need for providing subsidy or additional grant to the DISCOMs by the governments, if it chooses accordingly.</p>	
	<p>16. Due to paucity of time given, submissions on some of the issues could not be prepared and the issues raised in our written submissions could not be elaborated adequately. In response to my letter dated 23.9.2024, the Hon'ble Commission, while declining to extend the last date for submission of objections, has maintained that "the stakeholders can also submit their objections/comments in the scheduled public hearings. The Commission recognizes the contribution of the submissions of knowledgeable and interested stakeholders and the same will be considered." With public hearings scheduled from 21 to 25th of this month, and the Commission having just four days thereafter to issue its orders, to what extent it can consider the submissions made after the last date for submissions and on the dates of public hearings is anybody's guess. Whether subsequent submissions find a place in the orders to be issued by the Commission in eight petitions is to be seen, in view of the experience so far.</p>	<p>The queries and objections raised during the public hearing will be replied to and incorporated in the issued order.</p>
	<p>17. I request the Hon'ble Commission to permit me to make further submissions before and during the public hearings after studying replies of the licensees to my submissions.</p>	<p>Under the purview of Hon'ble Commission</p>

2. Response to S.Surya Prakasa Rao

2	S.Surya Prakasa Rao , Former Director (Commercial) ,erstwhile APCPDCL and Former Secretary, erstwhile APERC, Flat.no.105, Ashok Chandra Enclave, 11-4-660, Redhills, Hyderabad – 500004, Mobile : 9392272754	
S.N o.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>A. Preliminary submissions</p> <p>At the outset the Discom deserves compliments for the efforts made in compiling and providing elaborate data to facilitate objective study by stakeholders. It is a matter of consolation to consumers (except HT – 33kv and above) that no tariff hike is proposed in these filings except moderate increase in Fixed / Demand Charges.</p> <p>However , Hon’ble Commission may have to take a view whether it is desirable to allow tariff revision at this stage considering the following aspects:</p> <p>a).The filings are made after 6 months of the Financial Year. The Commission has to follow elaborate process to conduct the proceedings as required u/s 64 of the Electricity Act, for which around 90 days may be required though the Act allows 120 days.</p> <p>b). Discom didn’t propose any substantial tariff revision for most of the consumer classes except HT consumers, for whom the proposed revision of energy charges is unreasonable and irrational as explained in para 2 hereinafter.</p> <p>c). The additional revenue expected from revised Tariff is mere Rs.1028 Crs (2.5%) out of the total Annual Revenue Requirement of Rs. 40,788 Crs for 2024-25.</p> <p>d). Bulk of this 1028 Crs, is expected from 33kv and 132 kv Industrial consumers whose sales forecast appears to have been overestimated as explained hereinafter.</p> <p>e). Revised Tariffs can take effect only prospectively after one week from the date of publication of the revised Tariffs as per Sec.26 (6)</p>	<p>The delay caused in filing of Tariff petition has been explained in the said petitions.</p> <p>In order to ensure cost recovery, the licensees have proposed to increase in tariff in light of increase of costs.</p> <p>The category wise sales fore cast is based on the CAGR as was illustrated in the petitions.</p>

	<p>of the AP Electricity Reforms Act, 1998 read with the Electricity Act, 2003.</p> <p>f). If the effective date of new tariff is not synchronized with meter reading / billing cycle, it will cause additional work to Discoms and inconvenience to consumers.</p> <p>g). Any attempt to compress the schedule for determination of tariff may send wrong signals to the stakeholders of power sector.</p>																									
B - 1	<p>The Discom considered growth rate of 17. 68 % for 33kv Industrial-General (HT-I(A)) consumption on the basis of 3 yrs average, which was reported as follows (para 3.1.2)</p> <table border="1"> <thead> <tr> <th>Year</th> <th>sales in MU</th> <th>growth (%)</th> </tr> </thead> <tbody> <tr> <td>2017-18</td> <td>3568</td> <td></td> </tr> <tr> <td>2018-19</td> <td>4410</td> <td>19 %</td> </tr> <tr> <td>2019-20</td> <td>4174</td> <td>(-) 5 %</td> </tr> <tr> <td>2020-21</td> <td>3546</td> <td>(-) 15 %</td> </tr> <tr> <td>2021-22</td> <td>4534</td> <td>28 %</td> </tr> <tr> <td>2022-23</td> <td>5442</td> <td>20 %</td> </tr> <tr> <td>2023-24</td> <td>5778</td> <td>6 %</td> </tr> </tbody> </table> <p>The negative growth in 2019-20 and 2020-21 is attributable to the slump in industrial production during Covid-19 pandemic. The 3 year growth rate with ref to such negative values gives inflated growth rates.</p> <p>Similarly in the case of 132 kv Industrial consumption, the Discom adopted a growth rate of 31% on 3 year average basis. But there was negative growth of (-)20% in 2018-19 and (-) 9 %, in 2019-20, turning to the positive growth trajectory of 2.5 % in 2020-21, 41% in 2021-22, 54% in 2022-23, but only 3 % in 2023-24.</p> <p>Suggestion : Hon'ble Commission may please make appropriate correction to the growth rates of 33kv and 132kv Industrial-General category with ref to the actual consumption in the 1st half-year of 2024-25</p>	Year	sales in MU	growth (%)	2017-18	3568		2018-19	4410	19 %	2019-20	4174	(-) 5 %	2020-21	3546	(-) 15 %	2021-22	4534	28 %	2022-23	5442	20 %	2023-24	5778	6 %	<p>There is a rise in industrial activity post COVID and the licensee expects the same trend to continue in the future. Moreover, increase of IT parks/SEZ/Industries/pharma city etc. is anticipated by the licensee which results in higher industrial activity. From the objector's own submission, it is observed that there was a 19% increase in industrial sales in FY 2018-19 as compared to FY 2017-18 even though both the years fall in the pre-COVID era. Hence, Licensee feels it is prudent to consider higher growth rates for HT Industrial consumption, given the expected increase in industrial activity</p>
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2022-23	5442	20 %																								
2023-24	5778	6 %																								
B-2	<p>The main proposal of tariff revision in these filings is equating the energy charges of 33kv and above category Industrial-General</p>	<p>As per the clause 8.3(2) of the National Tariff policy- 2016, the Commission should notify a</p>																								

<p>consumers with that of 11 kv Industrial-General category and some other categories. This is unreasonable and irrational for the following reasons:</p> <p>a). The statutory guidelines u/s 61 of the Electricity Act mandate among others,</p> <p>(i). Safeguarding consumers' interest and at the same time recovery of cost of electricity in a reasonable manner</p> <p>(ii). Tariff progressively reflect the cost of supply of electricity and reduces the X-subsidies in the manner specified by the Appropriate Commission</p> <p>(iii). Appropriate Commission shall be guided by the National Electricity Policy and Tariff Policy</p> <p>b). National Electricity Policy observes that X-subsidies hide inefficiencies and should be reduced progressively and gradually. The Tariff Policy requires the Commissions to notify road map to bring tariffs within +/-20% of Average Cost of Supply.</p> <p>c). With the proposed increase of energy charges from Rs.7.15 to Rs.7.65 / unit for 33kv and from 6.65 to 7.65 / unit for 132 kv, the tariff for Industrial-General consumers will work out to Rs. 8.57 / unit including the component of about 92 paise per unit towards Demand Charge @ Rs. 500/Kva/ month at 75 % load factor.</p> <p>d). Cost of Supply as per filings (para 6.3.2)</p> <p>11kv Industrial-General : Rs.7.63/unit 33kv Industrial-General : Rs. 5.64/unit 132kv Industrial-General : Rs. 5.13/unit</p> <p>e). Thus these 33kv and 132 kv consumers will be contributing X-subsidy of about Rs.3 / unit and Rs.3.50 / unit respectively, which works to about 50% of COS for 33kv and 65% of COS for 132kv Industrial-General category consumers which is highly exorbitant and prohibitive.</p> <p>f). In these filings, the Discom proposed X-Subsidy Surcharge for Open Access consumers at Rs.1.68 / unit for 33kv and Rs. 1.58 / unit for 132kv consumers. It is unfair to charge tariff which contains</p>	<p>roadmap such that tariffs are brought within +/- 20% of Average Cost of Supply. The licensee would bring to the notice of the Hon'ble Commission that projected Average Cost of Supply for FY 2024-25 for the licensee is higher than approved Average Cost of Supply for FY 2023-24. In order to ensure cost recovery, the licensees have proposed to increase in tariff in light of increase of costs</p> <p>The licensee would also like to mention that the cross-subsidy surcharge has been computed as per clause 8.5 of the National Tariff Policy-2016.</p> <p>Further, the objector has mentioned about creation of regulatory asset. However, clause 8.2.2 of the National Tariff Policy-2016 mentions that under business-as-usual conditions, no regulatory asset shall be created. Moreover, as per clause 23 of Electricity (Amendment) Rules, 2024 there shall not be any gap between approved ARR and revenue from approved tariff except under natural calamity conditions. Hence the licensee is not in favor of creating a regulatory asset. Full recovery of costs incurred by the licensee through tariff will help improve its financial position, enabling licensee to provide quality and uninterrupted</p>
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	<p>X-subsidy component of Rs 3 to 3.5 / unit to its own consumers which is 100% higher compared to open access consumers.</p> <p>Suggestions :</p> <p>(i).In view of the circumstances explained by the Discom for the delay in the filings and in view of the position stated above, Hon'ble Commission may retain the existing tariffs across the board for all categories of consumers including HT.</p> <p>(ii). As the Revenue Deficit may increase marginally consequent to correction in growth rates of sale of energy under subsidizing categories, the Net Revenue Deficit (after accounting for the subsidy by State government u/s 65 of the Act) may be treated as a Regulatory Asset and its recovery may be spread equally over the balance 4 year period of the 5th Control Period (2025 – 29) in the interest of consumers as well as Discom.</p>	<p>supply to its consumers</p>
<p>B-3</p>	<p>The following broad picture emerges from the filings of the Discom for 2024-25 (figures rounded off please) :</p> <p>Energysales</p> <p>Sales to LT consumers : 29,903 MU (48 %)</p> <p>Sales to HT consumers : 25,456 MU (41 %)</p> <p>Energy losses : 6,677 MU (11 %)</p> <p>Total Energy Requirement: 62,036 MU</p> <p>Revenuesatcurrenttariffs</p> <p>Annual Revenue Requirement: 40,788 Crs</p> <p>Revenue from LT sales : 12, 716 Crs (31%)</p> <p>Revenue from HT sales: 21, 940 Crs (54 %)</p> <p>Revenue from other sources : 94 Crs</p> <p>Revenue Gap : (-) 5,957 Crs (15 %)</p> <p>After apportioning the energy losses between HT and LT sales, the HT categories consume about 45% of total energy and contribute 54 % of total Revenues while LT categories consume about 55% of total energy and contribute only about 31 % of total Revenues leading to revenue deficit of about 15 % .</p> <p>Cost of Supply</p>	<p>The sales of subsidizing categories depend on multiple factors such as nature of the industries and production cycle basis the market dynamics. Hence Discoms have no control over energy sales to Industries</p>

	<p>Cost of Supply at LT : Rs. 8.62 / unit Cost of Supply at HT : Rs. 5.89 / unit Average Cost of Supply : Rs.7.37 /unit Average Realisation and C-R ratio LT supply : Rs 4.25 /unit 49.30 % HT supply : Rs. 8.90 /unit 151.00 %</p> <p>Thus it's expedient for the Discom to sustain / improve the energy sales to subsidizing categories under HT and LT with appropriate initiatives /relaxation in terms and conditions of supply if necessary. Any proposal to increase tariff of these categories will be counterproductive to the objective of improving Revenues and financial health of Discoms.</p>	
B-4	<p>Electrical Accidents: (items 8 and 9 under earlier Directives and item 6 and 7 under new Directives) The Discom stated that the root-cause analysis was made as directed by the Commission and report submitted in its Lr.dt.22-6-2024. The Discom also stated that the awareness programs are being conducted and safety equipment is provided to the O&M staff to avoid Electrical Accidents. Discom stated that Rs.3.03 Crs, Rs.2.86 Crs and Rs.3.56 Crs was spent during 2021-22, 2022-23 and 2023-24 respectively. This is appreciable. In this context, it's necessary to refer to the CEA (Measures for Safety and Electricity Supply) Regulations 2010. Clause 5 the said Regulations requires Discoms to appoint Safety Officers to ensure observance of Safety Measures.</p>	<p>The electrical accidents occurred in TGSPDCL during the FY 2023-24, it is to be noted that out of 288 fatal accidents occurred, 276 accidents are due to the consumer faults, incautious of general public only, 12 nos. accidents were occurred due to departmental staff even after the utmost care taken by the staff of TGSPDCL and 5 are due to the contract labor of TGSPDCL. Hence, most of the accidents occurred are due to the inattentiveness of consumers by not following the safety measures, even after so many awareness programmes and advertisements conducted by TGSPDCL. As per the directions of the Hon'ble Commission, the DISCOMs are paying the ex-gratia to the victims, however the Commission has disallowed such expenses in the DISCOM filings.</p>
	Suggestions:	The TGDISCOMs are taking all safety

	<p>I suggest that Hon'ble Commission may issue Directions to the Discoms to appoint Safety Officer for each Discom if not for each Operation Circle, apart from improvement of Distribution Infrastructure already directed.</p> <p>Further , the Electrical Inspectorate under Chief Electrical Inspector to Government (CEIG) is the authority to investigate Electrical Accidents and to suggest rectifications under the scheme of the Electricity Act 2003, Hon'ble Commission may please hold joint meetings with CEIG , Discoms and Energy Department and advise the government to strengthen the Electrical Inspectorate to make out an effective action plan to reduce/avoid Electrical Accidents.</p>	<p>measures to prevent electrical accidents. The major electrical accidents are because of consumers faults.</p> <p>Appointment of safety officer will financially burden on DISCOMs.</p> <p>The DISCOMs are conducting public awareness programmes on electrical safety measures</p> <p>As per the Directions issued in RST order for F.Y.2023-24, the TGDISCOMs are conducting awareness programs among the consumers regarding safety standards, use of electricity TO AVOID ELECTRICAL ACCIDENTSby conducting seminars, workshops and awareness Programmes to minimize electrical accidents.</p> <ul style="list-style-type: none"> ➤ Exhibited electricity safety slogans ➤ Conducted workshops and seminars ➤ Displayed of banners and hoardings in the public places and substations. ➤ Wide publicity given to all the consumers by Tom-Toming announcements on the safety aspects in auto every month along with the Revenue collection.
	<p>Pre-paid metering: (items 14 and 15)</p> <p>Hon'bleCommission directed the Discoms to replace meters of willing consumers with pre-paid metering (item 14) and also submit report on action plan for replacement of existing meters with pre-paid metering (item 15). The Discom replied that it's mandatory to replace the meters of all</p>	<p>As per the directions of Hon'ble Commission, the compliance report for the Fourth quarter of F.Y. 2023-24 is as follows:</p> <p>a) As per the Gazette notification by the Central Electricity Authority (CEA), Ministry of Power Dt.17.08.202, it is mandatory that all the existing meters</p>

<p>consumers except Agricultural by March, 2025 as per the timelines given by Ministry of Power, Government of India in its letter dated 17th August, 2021. This premise of Discom is misconceived. Apparently Discom failed to note the Commission's view in para 6.27.2 of Tariff Order for 2022-23, which is extracted hereunder:</p> <p><i>"6.27.2: The Commission has taken note of the submissions of Discoms and the objections received from various stakeholders on the proposal of mandatory pre-paid meters for all government services. As pointed by one of the stakeholders, Discoms have to obtain consent of consumer for availing supply through pre-paid meter. The relevant extract of the Act is as follows....."</i></p> <p>The Discom also stated that a draft DPR is prepared at a cost of Rs. 9,803Crs to replace meters of 81 lakhs consumers other than Agricultural, and the same is to be approved by the Distribution Reforms Committee (DRC), State Cabinet, and final approval by the MOP, Government of India.</p> <p>Objections: Central Government has no authority under the Electricity Act to issue instructions to Discoms to replace existing meters with pre-payment metering. The Discoms are not bound by the instructions of MOP in the said letter dated 17- 8- 2021.</p> <p>Central Electricity Authority (CEA) has no power under the Electricity Act to insist installation of meters with pre-payment features for all consumers in the absence of any provision for mandatory pre-payment system in the Electricity Act. Pre-payment system is optional under the Electricity Act as of now. CEA Regulations are relevant for technical and operational specifications only.</p> <p>Hence the Discoms ought to have assessed the level of willingness of consumers to switch over to pre-payment system before</p>	<p>(Other than Agriculture Consumers) are to be replaced with Prepaid Smart Meters as per the following timelines.</p> <ul style="list-style-type: none"> ➤ All electrical divisions having more than 50% consumers in urban areas with AT&C losses more than 15% in FY2019-20, other electrical divisions with AT&C losses more than 25% in FY 2019-20, all Govt. Offices at Block level and above, and all industrial and commercial consumers will be metered with Smart meters working in pre payment mode by December'2023. ➤ All other areas will be metered with Smart meters working in pre-payment mode by March'2025. <p>b) The Govt. of India launched the revamped Distribution sector Scheme (RDSS) on Dt.29-07-2021, with an objective to reduce the AT&C losses to 12-15% (PAN India) and ACS-ARR gap to Zero. The Scheme consists of two components – Metering and Distribution Infrastructure Works.</p> <p>c) Accordingly, a draft DPR for Smart Prepaid Metering for all existing Consumers (excluding Agriculture Consumers) and System Metering under RDSS has been prepared for an amount of Rs.9308.37Cr. which is to be approved by Distribution Reforms Committee (DRC) and also by the Telangana State Cabinet in order to obtain final approval by MoP,</p>
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<p>preparing the DPR with huge investment of about Rs.10,000 Crs, which will be a colossal waste as most of the consumers may not opt for pre-payment system and it will become a wasteful investment.</p> <p>Further, in para 6.27.3 of the said Tariff Order it is stated that Discom has already installed 26,732 pre-paid meters for government services in terms of G.O. Ms. no.1 dt 31-1-2016 and MOP Lr.dt 17-8-2021.</p> <p>Discom may please be asked to inform the latest position and whether all these meters are operational and automatic disconnection is being done through meters for non-payment by due date. If they are not operational, Hon'ble Commission may please ensure that the cost of such wasteful investment is not loaded into the consumer tariffs in ARR / Tariff filings</p>	<p>Gol.</p> <p>d) As per RDSS guidelines the Gol grant Rs.900/- per meter under metering Plan. If Prepaid Smart Metering is to taken up under RDS Scheme, an approximate cost of Rs.729 Cr., for the existing 81,00,000 nos. consumers (other than Agl. Consumers) in TGSPDCL. As per proposal of TGSPDCL in the DPR, grant of Rs.799 Cr. will be disbursed Gol Grant to the DISCOM by MoP. If TGSPDCL does not participate in RDS Scheme, the above amount i.e., Rs.900/- per meter is to be borne by the DISCOM funds and the approximate financial commitment is Rs.729 Cr.</p> <p>e) As per the instructions of the Hon'ble Chief Minister of Telangana, a letter Dt.12.12.2023 was addressed to the Special Chief Secretary (Energy), Govt. of Telangana requesting to address a letter to the Ministry of Power, Gol regarding concurrence of GoTS for participation of TGDISCOMs in RDSS and accord approval for participation with revised DPR, as the scheme has been started in other states two years ago.</p> <p>f) The implementation of Smart Pre-payment Meters will be taken up after approval by Ministry of Power, Gol for participation of TGDISCOMs in RDSS with revised DPR.</p> <p>The smart meters enabled in prepaid mode</p>
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		are fully operational in TGSPDCL.
	Andhra Jyothi daily news paper published are port with many details on Electrical Accidents in its edition of 2 nd Oct 2024 which requires due attention of all concerned officials. The press clipping is being sent along with the covering email.	In connection to paper clipping, it is to inform that as per the table below the electrical accidents occurred in TGSPDCL during the FY 2023-24, it is to be noted that out of 288 fatal accidents occurred, 276 accidents are due to the consumer faults, incautious of general public only, 12 nos accidents were occurred due to departmental staff even after the utmost care taken by the staff of TGSPDCL and 5 are due to the contract labour of TGSPDCL. Hence, most of the accidents occurred are due to the inattentiveness of consumers by not following the safety measures, even after so many awareness programmes and advertisements conducted by TGSPDCL.
	<p>Statutory Inspection of New Lines</p> <p>As per the procedure in vogue during our time, the State government authorized Transco/ Discom to conduct Statutory Inspections for their new lines. Electrical Inspectorate was inspecting H.T consumer installations and Generating Stations. I am of the view that it's desirable to entrust the duty of statutory inspections to an independent agency accredited by the Government or CEA or any other competent authority. Institutions like Institution of Engineers or Engineering Staff College of India, Hyderabad (ESCI) may be considered by the State Government.</p>	A circular memo was issued by Chief engineer(Commercial) vid Circular Memo No.CE(Comml)/SE(C)/ DE(EoDB)/ ADE-EoDB/D.No.2567/24, Dt28.09.2024
	<p>Periodical Inspection and Rectification of Lines</p> <p>Pre- monsoon inspections</p> <p>Normally the Discoms conduct pre-monsoon inspections as an annual feature, which mainly covers tree clearance, replacement of flashed / damaged insulators, rectifications of loose contacts at joints at cut- points etc, to avoid/ reduce interruptions of supply</p>	The DISCOMs are regularly conducting pre-monsoon inspections and it is a regular practice in the TGDISCOMs every year. In consonance with the pre-monsoon inspection, the defective equipments are being replaced immediately along with tree

	<p>during ensuring monsoon season. But re-stringing of loose spans which are likely to endanger humans animals life, is not attended during these inspections.</p>	<p>trimming under the electrical lines and Licensees have taken up rectification of earthings, AB Switches, HG fuse sets, replacement of LT cable and fuse carriers for transformers, load balancing of transformers ,rectification of oil leakages in transformers, Erection of inter poles, replacement of damaged and rusted poles, rectification of stays, replacement of spans of conductor and re stringing of spans of loose lines.</p>
	<p>Special Drive for Inspection/Rectification of Lines to prevent/reduce Electrical Accidents</p> <p>Hon'ble Commission may take a view whether to direct the Discoms to undertake Special Drive for Inspection and Rectification of Lines as follows from the view point of preventing accidents: Every Operation Circle may constitute sufficient number of teams for this purpose exclusively.</p> <p>These teams will conduct inspection of specified distributions in one week, note down the defects, procure necessary resources (men and materials) and take up the rectification work in the following week itself, and repeat the process as a fortnightly program. Discom officials may try to involve local people to identify the vulnerable points and motivate them to assist the Discom in taking up rectification work. Discom may sanction area wise schemes on the basis of rational norms instead of on actual survey of each distribution to avoid starting trouble for this Special Drive. This method of inspections / rectifications was implemented in composite AP in mid 1970s as per the instructions issued by the then Chief Engineer/Operation, SriV.S.Ganapathi Ram. It's worth trying now.</p>	<p>The TGDISCOMs have conducted power week programs in all the circles in line with the State Government Palle Pragathi and Pattana Pragathi programs.</p> <p>During Palle Pragathi and Pattana Pragathi programs TGDSICOMs have conducted special drive for inspection of lines/ Rectification of lines and identified rusted poles, damaged poles, loose lines, and damaged conductor.</p> <p>Based on the identified quantities, estimates were done and rectified all the defective parts of the electrical lines in all the villages, Towns and municipalities.</p> <p>Further, as per the directions of Hon'ble Commission, TGDISCOMs are conducting Inspection/ Rectification of Lines and taking measures to improve poor distribution network and also submitting the reports on planning of Programs and their Progress of rectification of Poor Distribution Infrastructure to the Hon'ble Commission.</p>

<p>Franchisee system at village level. Hon'ble Commission may please take a view whether to introduce Franchisee system for some vulnerable LT Distributions u/s 14 (7th proviso) for taking up maintenance functions on a pilot basis after completion of the rectifications under the proposed Special Drive or otherwise. Franchisees system was followed for some Distributions in Maharashtra a few years ago. I am not aware whether it is still being implemented successfully.</p>	<p>Initiation of Village level franchisee in TGSDISCOMs will lead to financial burden of TGDISCOMs.</p>
<p>District Level Committees Sec166 (5) provides for constitution of District Level Committees by State government to review / coordinate certain aspects concerning electricity supply. I am not aware whether these committees were constituted and functional. Hon'ble Commission may advise the government to constitute the same for all districts including new districts and to coordinate with Discoms on the initiatives being taken to reduce/avoid Electrical Accidents, apart from the functions entrusted to the Committees u/s 166 (5) of the Electricity Act. Further, Hon'ble Commission may please examine whether there's need for Mandal Level / Village Level Committees and advise the State government suitably u/s 86 (2)(iii) of the Act.</p>	<p>Initiation of District level Committees in TGSDISCOMs will lead to financial burden of TGDISCOMs. Further, as per the directions of Hon'ble Commission, TGDISCOMs are conducting Inspection/ Rectification of Lines and taking measures to improve poor distribution network and also submitting the reports on planning of Programs and their Progress of rectification of Poor Distribution Infrastructure to the Hon'ble Commission. Hon'ble Commission will examine whether there's need for Mandal Level / Village Level Committees and advise the State government suitably u/s 86 (2)(iii) of the Act.</p>
<p>Protection against LT line faults Long back, LT breakers with relays for tripping the line were provided at the Distribution Transformer structure for LT feeder protection against earth faults. But these were withdrawn later perhaps due to inconvenience caused to consumers' consequent to frequent trippings as the incidence of earth fault is very high in LT lines for various reasons. Hon'ble Commission may please elicit the views of Academic Institutions, Manufacturers of LT breakers and CEA for a workable solution of protection for LT lines to avoid Electrical Accidents and</p>	<p>It is under purview of Hon'ble Commission</p>

	without causing undue inconvenience to consumers due to frequent tripping. Submitted for consideration by the Hon'ble Commission in public interest before finalizing the ARR/Tariff filings of TG Discoms.	
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economy and acts as a backbone to the valuable IT Industry of India. This is because fast internet and leased line connections provided by this critical infrastructure sector are foundational for smooth functioning and growth of the IT industry. Moreover, the sector is pivotal to the nation's 'Digital India' aspirations, providing affordable connectivity and widespread socio-economic benefits to the people at large.

4. We would like to submit that increasing the tariff from INR 70/kW to INR 150/kW, as proposed, will pose a challenge to the industry, especially with the rapid increase in network. Any hike in fixed and variable charges will adversely impact the operational costs for this essential service. Hence, we pray to the Hon'ble Commission for reduction in fixed and variable charges, or, at best maintain at the current rate.

5. The industry will also take this opportunity to submit our request on the category of Electricity Tariffs. At present, the telecommunications industry is being charged with commercial rates, resulting in undue financial burden on this sector. We wish to state that progressive states like Maharashtra and Himachal Pradesh, already offer electricity under industrial tariff to telecom. It is our humble request to your High Office to provide a considered view and have the Telecom Industry electricity tariffs kindly placed under Industrial rates, rather than the commercial rates.

We trust our submission will merit your kind consideration and look forward to the valued support of your good office in this important matter.

3. Needs no reply.

4. In the current tariff structure only 30% of the fixed cost is being recovered through fixed charges. The fixed charges constitute the fixed revenue of DISCOMs and are not reflective of the fixed costs incurred by them. Hence the DISCOMs request the Hon'ble Commission to approve the proposed tariffs. Full recovery of cost incurred by DISCOMs will enable delivery of quality, reliable and uninterrupted power supply to its consumers.

5. As the Licensee is extending the quality reliable and uninterrupted power supply to its consumers, for which the DISCOM need to recover full cost of service incurred. Hence the DISCOMs request the Hon'ble Commission to approve the proposed tariffs.

4. Response to M.Thimma Reddy

4	M. Thimma Reddy , Convenor, People’s Monitoring Group on Electricity Regulation, H. No. 3-4-107/1, (Plot No. 39), Radha Krishna Nagar, Attapur, Hyderabad – 500048	
S.No.	Summary of Objections / Suggestions	Response of the Licensee
2.1	<p>According to Section 6.2 of Regulation 2 of 2023 Multi Year Tariff (MYT) Petition for the control period FY 2024-25 to FY 2028-29 has to be filed by 31-01-2024. The present MYT petition for 5th control period was filed on 18-09-2024, a delay of more than half year. The reasons attributed by TGDISCOMs for this delay are time taken in analysing the financial impact on the TGDISCOMS due to Gruha Jyothi Scheme and ‘certain difficulties faced by the TGDISCOMS’. But the TGDISCOMs did not show anywhere in these filings the financial impact of Gruha Jyothi Scheme on the finances of TGDISCOMs. Also, nowhere ‘certain difficulties’ faced by the TGDISCOMS are elaborated. This gives the impression that TGDISCOMs are only following their nearly decade old practice of delayed filing of ARR and tariff proposals with scant regard to the Electricity Act, 2003 and Rules and Regulations framed under the said Act.</p>	<p>The Hon’ble Commission has accorded the approval to the TGDISCOMs to file the ARR and FPT for RSB filings on annual basis for the first year of 5th Control Period i.e., FY 2024-25 after careful consideration of the submissions made by the TGDISCOMs. When the Regulation No.2 of 2023 was notified on 30.12.2023, the TGDISCOMs were seeking clarifications on certain clauses of the new MYT Regulation No.2 of 2023 as there was huge impact on the financials of the DISCOMs and also there was a change in regulatory regime because of which DISCOMs needed to collect additional data for preparing the petitions. then the TGDISCOMs have initiated the process of collecting the required data from the various wings for which it took time. Subsequently, the Gruhajyothi Scheme was announced by the GoTG which further delayed the process of Filings of ARR. Meanwhile, Model code of conduct came into force, due to which the TGDISCOMs could not file the ARR filings. The DISCOMs have duly submitted the condonation of delay petition before the Hon’ble Commission stating these reasons.</p>
2.2	The Commission in its Tariff Order for the FY 2023-24 at paragraphs 1.12.2 and 1.12.3 noted the	

	<p>following stakeholders' observations:</p> <p>"In the integrated rating score methodology introduced by Ministry of Power for assessing the health of TSDISCOMs, one of the parameters is specific disincentives which provides for Tariff Cycle Delays in terms of timely filing of the Petitions."</p> <p>"Further, this amounts to a gross violation of Hon'ble APTEL directives in O.P.No.1 of 2011 as is reproduced below: "57.... ... In the event of delay in filing of the ARR, truing up and Annual Performance Review, one month beyond the scheduled date of submission of the petition, the State Commission must initiate Suo Moto proceedings for tariff determination in accordance with Section 64 of the Act read with clause 8.1(7) of the Tariff Policy."</p>	<p>No comments</p>
<p>2.3</p>	<p>The Commission in its Tariff Order for the FY 2023-24 at paragraph 1.12.7 stated its following view:</p> <p>"The Commission in order to provide consequences of delay in filing the proposals with the Commission has notified the following amendments to the Principal Regulations relating to TSDISCOMs with stringent penalties viz., the penal fee that is attracted in case of the licensee not complying with the provisions of Regulations, the rate of return on equity shall be reduced by 0.5% per month or part thereof.</p> <p>Second Amendment to the Principal Regulation No.4 of 2005 viz., Terms and Conditions for Determination of Tariff for Wheeling and Retail Sale of Electricity. [Regulation No.1 of 2022]</p> <p>ii) First Amendment to the Principal Regulation No.2</p>	<p>The TGDISCOMs have already paid the penalties imposed by the Hon'ble Commission towards delay in filing of ARR Petitions for Retail Supply Business And Distribution Business .</p>

	of 2016 viz., Fee [Regulation No.2 of 2022]”	
2.4	Such measures are not included in Regulation 2 of 2023. To discourage delay in filing ARR and tariff proposals the above measures may be reintroduced in the new MYT Regulations.	
3.1	<p>TGDISCOMs estimated power requirement during the FY 2024-25 to be 85,284 MU. This is 2.55% higher than power requirement projected by TGDISCOMs during the FY 2023-24, higher than 1.32% approved by the Commission but 1.66% less than actual consumption reported by TGDISCOMs during FY 2023-24. TGDISCOMs adopted different consumption growth rates for different consumer categories to arrive at power procurement requirement during FY 2024-25. Power consumption trend during FY 2023-24 is different from previous years. In the past power requirement estimated during a year by TGDISCOMs used to be higher than that projected by the Commission and the projection by the Commission used to be higher than the actual consumption. But during the FY 2023-24 power requirement estimated by the Commission (84,156 MU) was higher than that of TGDISCOMs (83,113 MU) and in turn actual consumption reported by TGDISCOMs (86,703 MU) was higher than that estimated by the Commission. In such circumstances when the base on which growth rates are calculated is higher there is a chance that overall power requirement will be on higher side. Hence, power requirement for FY 2024-25 arrived at by TGDISCOMs needs to closely scrutinised</p>	<p>The actual sales varies depending on many factors like variation in monsoon, temperature and industrial policies of the Government. Hence, sales are the uncontrollable factor which is recognized by the Hon'ble Commission in its MYT Regulation no. 2 of 2023.</p> <p>The DISCOMs have forecasted sales consumption by taking historical growth rates. Any deviation in actual sales as compared to approved sales, which would result in deviation of Power Purchase cost as well as revenue would be adjusted in subsequent True-up filings by the licensee</p>

3.2	<p>According to TGDISCOMs' estimates LT domestic consumers will be using 15,758 MU during the FY 2024-25. LT domestic consumers will account for 18.48% of electricity requirement during the ensuing year. Compared to this during the FY 2023-24 LT domestic consumers accounted for 16.62% of electricity requirement. While SPDCL assumed that electricity consumption by LT domestic consumers would increase by 5.97% during FY 2024-25 NPDCL assumed 5% increase. TGDISCOMs mentioned starting of implementation of Gruha Jyothi Scheme as one of the reasons for delay in filing the present ARR and Tariff Proposals. According to their submission, "the Licensee was analysing the financial impact in the TGDISCOMs due to Gruha Jyothi Scheme which may hinder the licensee in filing the ARR & Tariff Proposals for RSB for FY 2024-25 to FY 2028-29 and Distribution Business for 5th Control Period." But in the present filings TGDISCOMs did not mention any impact of Gruha Jyothi Scheme on consumption pattern of domestic consumers. According to the Scheme rules the identified beneficiaries would become ineligible if their electricity consumption exceeds the past consumption trends or exceeds 200 units. Because of this, domestic consumers would moderate their electricity consumption. This would result in lower growth rate in electricity consumption by domestic consumers. In this background assumption of 5 to 5.97% growth rate in electricity consumption by LT domestic consumers appears to be on the higher side and the same need to be brought down</p>	<p>The DISCOMs have forecasted sales consumption by taking historical growth rates. For LT-Domestic sales projection, DISCOMs have considered 5-year CAGR. For the Gruha Jyothi scheme consumers, the electricity is free upto 200 units of consumption. Hence, the consumers having less than 200 units of consumption may utilize upto 200 units which is free as per the declaration by the State Government. The Gruha Jyothi scheme consumers crossing 200 units of consumption is for limited period only during peak summer. Hence, the licensee has considered historical CAGR for projecting sales for most of the categories . Any deviation in actual sales as compared to approved sales, which would result in deviation of Power Purchase cost as well as revenue would be adjusted in subsequent True-up filings by the licensee.</p>
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3.3.1	<p>TGDISCOMs estimated that agriculture pump sets would be consuming 20,748 MU of electricity during the FY 2024-25 accounting for 24.33% of electricity requirement in the state. While in the case of other consumer categories CAGR was applied over consumption figures of 2023-24 in the case of LT agriculture CAGR was applied twice over the consumption figures of 2022-23. This is because according to TGDISOCMs submissions agriculture consumption during FY 2023-24 increased abnormally. According to these filings during FY 2023-24 LT agriculture services consumed 25,154 MU accounting for 28.04% of the electricity procured in the state. This was 40.67% higher than the estimates made by TGDISCOMs (17,881 MU) and 26.98% higher than the projections of the Commission (19,811 MU). TGDISCOMs did not provide any reasons for this abnormal consumption of electricity by LT agriculture services. In the absence of meters to the agriculture services in the past TGDISCOMs used ISI Methodology approved by the Commission for estimation of electricity consumption by agriculture pump sets. In the present filings NPDCL used 2.59% and SPDCL used 1.39% twice over 2022-23 consumption to arrive at LT agriculture consumption. During FY 2024-25 while NPDCL projected 3.94% increase in number of LT agriculture services SPDCL projected 4.38% increase. Growth rates in electricity consumption by LT agriculture services adopted by TGDISCOMs do not have any relation to increase in number of LT agriculture services during this period. Such data raises further doubts on TGDISCOMs'</p>	<p>In FY 2023-24 the agricultural sales have increased, due to lower than expected monsoon, leading to reduction in ground water levels. Hence, the licensee has not considered growth rates based on FY 2023-24 sales as it considers that as an anomaly. Therefore, the licensee has considered 5-year CAGR and applied it twice over FY 2022-23 agricultural sales to arrive at agricultural sales projections for FY 2024-25.</p> <p>In FY 2023-24 the agricultural sales have increased, due to lower than expected monsoon, leading to reduction in ground water levels. Hence, the licensee has not considered growth rates based on FY 2023-24 sales as it considers that as an anomaly. Therefore, the licensee has considered 5-year CAGR and applied it twice over FY 2022-23 agricultural sales to arrive at agricultural sales projections for FY 2024-25.</p>
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	claims regarding electricity consumption by LT agriculture services.	
3.3.2	TGDISCOMs' computation of LT agriculture services' electricity consumption during FY 2023-24 needs to be subjected to detailed examination. According to their own submissions it was abnormal, and they did not provide any reasons for such abnormal figures. During FY 2023-24 LT agriculture services accounted for 28.04% of the electricity procured in the state. This is the highest percentage recorded in the recent history. This has different implications. On the one hand it helps to hide equally abnormally high T&D losses and on the other it imposes high subsidy burden on the state government as electricity supplied to LT agriculture services is free	
3.3.3	One way to overcome present problems in estimation of electricity consumption by agriculture pump sets is to meter DTRs serving LT agriculture connections. But DISCOMs are avoiding this for reasons best known to them. In the past they have pointed out that financial institutions are not coming forward to finance it. Recent news reports indicate that TGSPDCL is going to spend more than Rs. 500 crore on HVDS DTRs for agriculture sector, which itself is questionable. But they are unwilling to mobilize a fraction of this to meter these DTRs. It is to be noted that metering DTRs serving agriculture connections will be cheaper than metering all agriculture services	The DISCOMs will take-up metering of DTRs based on the guidelines and approval of RDSS scheme by MoP, Gol.
3.4	TGDISCOMs projected electricity consumption by Lift Irrigations schemes during FY 2024-25 to be 2,618 MU. Compared to this estimated electricity consumption by these Lift Irrigations schemes	Historically LIS sales have been erratic. There has been a reduction in Actual LIS sales for FY 2023-24 as compared to approved .The reasons are multifold, including Monsoon seasonality etc. Hence, the licensee has considered LIS

	<p>during FY 2023-24 was 7,594 MU. TGDISCOMs in their filings noted, “Historically, LIS sales have been very erratic. So, considered same as FY 2023- 24 sales.” But this is far from truth. There were reasons for this drastic decline in electricity consumption by Lift Irrigation schemes. Previously some of the pump houses of KLIS were submerged during floods and got damaged. Later, some parts of KLIS structures were damaged making them too dangerous to operate. During recent rains some pump houses of PRLIS were also got submerged, throwing them out of operation. Despite these, some parts of these Lift Irrigation components sought to be operated. TGDISCOMs need to take ground situation in to account to estimate electricity demand by these lift irrigation schemes</p>	<p>sales projections for FY 2024-25 to be same as FY 2023-24. Any deviation in actual sales as compared to approved sales, which would result in deviation of Power Purchase cost as well as revenue would be adjusted in True-up filings</p>
3.5.1	<p>During the FY 2024-25 T&D losses are projected to account for 11% of the electricity requirement in the state. While it will be 11.67% in the case of NPDCL it will be 10.76% in the case of SPDCL. For the FY 2018-19 the Tripartite MoU under UDAY set the AT&C losses of TSNPDCL at 10.00% and TSSPDCL at 9.90%. AT&C losses include collection efficiency along with T&D losses. T&D loss levels should have been much less than AT&C losses. The T&D losses projected by TGDISCOMs in the ARR for FY 2024-25 are higher than the levels stipulated for the FY 2018-19 under the Tripartite UDAY - MoU. What is more according to their present filings T&D losses during FY 2023-24 stood at 14.14% of the power supplied in the state. If we take in to account ‘abnormal’ electricity consumption by LT agriculture services during FY 2023-24 actual</p>	<p>The increase in agriculture sales accounts to various factors like increase in ground water level, monsoon and crop pattern etc., The T&D loss percentages has been considered as per the approved Resource Plan and Business Plan for 5th Control Period for FY 2024-25 to FY 2028-29.</p>

	T&D losses should have been much higher. It is high time the Commission takes a serious view of this phenomenon. Over the last few years TGDISCOMs have spent thousands of crores on T&D network in the name of improving quality of supply and bringing down T&D losses. But neither of them was realised even when consumers were subjected to higher tariffs year after year.	
3.5.2	When the estimated T&D losses are brought down to lower levels the quantum of power to be procured will also come down reducing tariff burden on the consumers.	The DISCOM is putting all efforts to reduce its losses and reach the targets set by the Honble Commission. It is expected to reduce the losses further by reduction of technical and commercial losses by vigorously conducting 11kV feeder wise energy audits and by taking necessary measures for reduction of losses in the company.
3.6	According to Demand Side Management Regulation of 2020 (Regulation 1 of 2020) Distribution Licensees shall submit a DSM plan to the Commission six months before the MYT control period and implement the same. DSM interventions are expected to bring down overall electricity consumption. We would like to know whether TGDISCOMs submitted DSM plans for the MYT control period under examination. If yes, whether it is taken in to account while estimating power procurement requirement during the FY 2024-25.	TGDISCOMs are planning to implement DSM plans by installing smart meters at consumer, DT and feeder level subject to approval of RDSS Scheme by MoP, Gol.
4.1.1	In the case of power procurement from Marwa thermal power plant of Chhattisgarh State Power Distribution Company Limited (CSPDCL) TGDISCOMs have submitted as follows: "A judicial committee has been appointed to investigate power procurement from CSPDCL station. Hence, Power has not been scheduled from CSPDCL plant in the	Energy dispatch from Chhattisgarh State Power Distribution Company Limited (CSPDCL) has been suspended due to ongoing disputes from FY 2022-23 and the Licensee is currently not scheduling any dispatch from CSPDCL. Further, energy availability from BTPS has been considered as Licensee is continuing to procure power and the same has been indicated in the approved Resource Plan. Energy

	current control period.” The terms of reference of the Commission of Inquiry include examination of power procurement from BTPS and YTPS of TGGENCO along with CSPDCL. If power has not been scheduled from CSPDCL due to judicial inquiry then the same shall also apply to BTPS and YTPS of TGGENCO.	availability from YTPS is expected to start from December 2024 (2 units of 800 MW) and therefore the same has been considered.
4.1.2	TGDISCOMs’ ARR filings for the FY 2024-25 show that power generation from YTPS will commence from December 2024. But press reports mention Deputy Chief Minister directing TGGENCO officials to start power generation from this plant at least by next March. (The Hindu, 12-09-2024) Among other things YTPS is reported to be facing staff crunch. The Commission is requested to direct TGDISCOMs to come out with the actual situation at YTPS.	While filing ARR for the FY 2024-25, the TGDISCOMs have considered the information received from the TGGENCO that power generation from YTPS will commence from December 2024. Now, it is under Commission purview to consider the appropriate Generation.
4.2.1	According to TGDISCOMs’ ARR and Tariff filings for FY 2024-25 electricity availability will be 1,08,651 MU and dispatch will be 85,284 MU leaving a surplus of 23,367 MU. Surplus power accounts for 21.51% of the power available to the state during FY 2024-25.	The surplus power shown due to consideration of NAAAF & NAPLF of the power plants having long term PPA’s and upcoming power plants. However, there is likely variation of availabilities and PLFs of the Plants.
4.2.2	Power available to TGDISCOMs during FY 2024-25 includes short term procurement of 4,985 MU. The related question is – when 23,367 MU of surplus power is available is there need to go for short term purchase of 4,985 MU at a higher price? As TGDISCOMs are facing surplus power situation during FY 2024-25 we request the Commission not to allow short term purchases.	The short term power procurement has been determined on the basis of Hourly demand and available energy source to meet that demand for each hour. In peak hours and peak month the available dispatch from tied up sources is not enough to meet demand (in MW) and hence market purchase are considered to meet demand (in MW). Similarly during non-peak months, available dispatch from tied-up sources is higher than demand and the state will have surplus energy.
4.2.3	Power availability from Neyveli new unit I and II was	The energy availability for the station has not been

	included during FYs 2022-23 and 2023-24 but the same is not included under power availability during FY 2024-25. To this extent power availability during FY 2024-25 may have been under estimated. The same needs to be examined.	projected in the Approved Resource Plan for the 5 th Control Period. Further, the share of TSDISCOMs from Neyveli new unit I and II was relinquished vide letter dated 29.03.2022 which was accepted by M/s NLC. Hence, the same has not been considered.
4.3.1	TGDISCOMs propose to spend Rs. 42,702 crores on power procurement during the FY 2024-25. This accounts for 73.81% of aggregate revenue requirement (ARR). Avenues shall be explored to bring down power procurement cost to reduce tariff burden on the consumers as well as budgetary support from the state government.	The current power purchase cost has been determined based on existing PPAs of TGDISCOM with the various generators and the required dispatch from the various stations based on the variable demand. The Licensee shall strive to optimize and reduce power purchase cost on a best effort basis.
4.3.2	The present filings show that during FY 2024-25 TGDISCOMs would be selling 9,450 MU (NPDCL = 2,783 MU and SPDCL = 6,667 MU) of surplus power and would be receiving revenue of Rs. 2,170 crores. Average revenue from sale of this surplus power will be Rs. 2.30 per unit. This revenue from sale of surplus power is shown to bring down total power purchase costs. But this quantum of surplus power is not shown under power requirement/procurement. This surplus power to be sold in the market in the first place it needs to be purchased by DISCOMs. But its power purchase cost is not included under total power purchase cost. To that extent power purchase cost is under estimated. Consequently, ARR as well as deficit to be covered are also under estimated. Average revenue from sale of this surplus power is lower than unit variable cost from all sources. This implies that this surplus power will be sold at loss. This further implies that this whole exercise of sale of surplus power instead of reducing power purchase	The revenue indicated as the sale of surplus power is net of the power purchase cost and is the difference between the average market rate and the average variable cost of the respective stations. Hence, the value indicated is the income of DISCOMs from the sale of surplus power net of power purchase cost and therefore, the same can be considered as included in the ARR.

	cost will in fact increase it. The Commission is requested to scrutinise TGDISCOMs' claims regarding sale of surplus power during the FY 2024-25.	
4.3.3	The filings for the FY 2023-24 had shown a surplus of more than 13,000 MU. But the present filings show that surplus power during the FY 2023-24 had come down to little more than 1,000 MU. At the same time 16,293 MU were procured through short term purchases during FY 2023-24 at a cost of Rs. 8,566 crores. Average cost of this short-term power procurement was Rs. 5.26 per unit. During the same time thermal power units of TGGENCO operated at below their threshold PLF. During FY 2023-24 TGGENCO units operated at PLF of 50 to 69% though threshold PLF is 85%. During this period power from some of CGS units was also procured at below their threshold PLF. Variable cost of these thermal power plants was much less than average cost at which short term power was procured. This shows that during FY 2023-24 costly power was procured even when cheaper sources were available resulting avoidable tariff burden on consumers in the state and subsidy burden on the state government. In this background we request the Commission to scrutinise TGDISCOMs' power procurement during FY 2023-24.	The short term power procurement has been determined on the basis of Hourly demand and available energy source to meet that demand for each hour. In peak hours and peak month the available dispatch from tied up sources is not enough to meet demand (in MW) and hence market purchase are considered to meet demand (in MW). Similarly during non-peak months, available dispatch from tied-up sources is higher than demand and the state will have Surplus energy.
4.3.4	The Telangana State Power Sector White Paper brought out by the State Government of Telangana has highlighted high capital costs of BTPS and YTPS. According to this White Paper capital cost of BTPS is Rs. 9.74 crore per MW while its planned capital cost was Rs. 6.75 crore per MW. Capital cost	The DISCOM will abide the directions of the Hon'ble Commission.

	<p>of YTPS is Rs. 8.64 crore per MW. Compared to this, according to this White Paper, capital cost of NTPC's new plant coming up at Ramagundam specifically meant for Telangana is Rs. 7.63 Crore per MW. High capital cost of these two plants is because of inordinate delay in and inefficient execution of these plants. Electricity consumers in the state shall not be burdened with inefficient execution and operation of these plants and we request the Commission to review capital costs of these power plants.</p>	
4.3.5	<p>BTPS is reported to be facing serious problems in operation and maintenance of the plant due to problems in quality of machinery supplied to it by BHEL. This machinery was actually meant for a private sector company's power plant to come up in Maharashtra. As the private company failed to set up the plant the machinery was lying idle with BHEL. This machinery lying idle was used to set up BTPS. Once brought in to operation the BTPS units are facing severe problems. The BTPS units are reported to be facing so many problems similar to that of a plant that has been in operation for 10 to 15 years. In the background of the problems faced in operating the BTPS units and the questionable quality of machinery (for all practical purposes second hand machinery) supplied by BHEL its capital cost needs to be reevaluated.</p>	<p>The DISCOM will abide the directions of the Hon'ble Commission.</p>
4.3.6	<p>Present filings show that Variable charges for YTPS during FY 2024-25 will be Rs. 2.54 per unit. This is the lowest variable cost among all thermal power plants of TGGENCO. The Telangana State Power Sector White Paper brought out by the State</p>	<p>The variable charges for YTPS has been considered as per the Detailed Project Report (DPR). The DISCOM will abide the directions of the Hon'ble Commission.</p>

	<p>Government of Telangana pointed out that as the plant is located far away from coal mines of SCCL transport component will add to the coal cost leading to higher variable cost. It was estimated that because of this non-pit head status of this plant variable cost of power from this plant will be higher by more than one rupee per unit. Contrary to this the present filings show that variable cost of this plant will be lower than pit head power plants. While lower costs need to be welcomed as it is against the trend the same needs to be clarified.</p>	
4.3.7	<p>According to the present filings variable cost of power from TGGENCO's Ramagundam – B during the FY 2024-25 will be Rs. 4.63 per unit. This is highest among all thermal power plants of TGGENCO. As it is in close proximity of coal mines its variable cost is expected to be lower. During the same period variable cost of NTPC's Ramagundam units will be Rs. 3.82 per unit. Given this experience variable cost of TGGENCO's Ramagundam – B plant has to be brought down.</p>	<p>The variable cost for TGGENCO's Ramagundam-B plant has been considered as per the TGGENCO ARR Filing. The DISCOM will abide the directions of the Hon'ble Commission.</p>
5.1.1	<p>According to NPDCL filings of FY 2024-25 total arrears of Rs. 50,000 and more pending for six months as on 31-03-2024 are Rs. 11, 772.72 crore. These arrears are equal to 59.66% of ARR of FY 2023-24. According to SPDCL filings of FY 2024-25 total arrears of Rs. 50,000 and more pending for six months as on 30-09-2023 are Rs. 12, 917.60 crore. These arrears are equal to 29.81% of ARR of FY 2023-24. Both the DISCOMs are facing arrears of Rs. 24,690 crores. Substantial portion of these arrears have to come from state government departments. (While SPDCL mentioned the arrears</p>	<p>The DISCOMs are regularly corresponding with the heads of the concerned departments for payment of arrears by addressing D.O letters.</p>

	<p>due from Government departments NPDCL did not show these details). According to SPDCL submission arrears due from state government departments stand at Rs. 8,057.85 crore accounting for 62.38% of the arrears. Situation may be the same or even worse in the case of NPDCL. According to Section 1.2 i) of UDAY – MoU all outstanding dues from the government departments to DISCOMs for supply of electricity shall be paid by 31-03-2017. Since then, arrears from state government departments in fact have increased.</p>	
5.1.2	<p>If the arrears below Rs. 50,000 are also taken in to account total arrears due to TGDISCOMs will be much higher. Because of these mounting arrears TGDISCOMs are forced in to heavy debt burden and it is one of the reasons for losses incurred by the TGDISCOMs. We request the Commission to advise the State Government to release arrears pending from state government departments in a time bound manner. We also request the Commission to direct DISCOMs to take effective steps to bring down arrears from other consumers.</p>	<p>The DISCOM will abide the directions of the Hon'ble Commission.</p>
5.2.1	<p>TGSPDCL paid compensation to consumers in 10 cases for deficiency of services as per Regulations of the Commission. Total compensation paid was Rs. 18,000. TGNPDCL did not mention the number of cases in which compensation was paid to consumers for deficiency of service. It only mentioned the amount of compensation paid. It paid Rs. 1,36,487 towards compensation to consumers. The number of cases in which compensation was paid were too few to reflect reality. Consumers in the state are being made to run from pillar to post to</p>	<p>The TGSPDCL is achieving the SOP and communicating the reports to the Hon'ble Commission as per the schedule vide Regulation no.5 of 2016.</p>

	get the works done. For all practical purposes Standards of Performance (SoP) do not exist. They exist only on paper. We request the Commission to institute a third party assessment of TGDISCOMs' claims on SoP.	
5.2.2	We would like to know the number of employees of the Licensees caught red handed by Anti Corruption Bureau (ACB) of Telangana Police during the 4th Control Period. What was the action taken by TGDISCOMs against them? How many of them were reinstated?	U.O addressed to CE(HRD)
5.3.1	During the FY 2023-24 the number fatal accidents involving humans stood at 644. This is one the highest number of fatal accidents in the recent past. This shows that there was not much improvement in safety measures. Unacceptable high fatal accidents are taking place in spite of huge investments in men and materials to strengthen T&D network. SPDCL filings show that out of 288 fatal accidents general public were involved in 276 fatal accidents.	As per the Directions issued in RST order for F.Y.2023-24, it is to inform that, instructions were issued to the concerned officers of TGSPDCL to conduct awareness programs among the consumers by observing Electrical Safety Week at all the offices of TGSPDCL and also some important locations in the towns and villages including the 33/11 kV substations to create Electrical Safety Awareness among Public, Staff and Contract workers by conducting seminars, workshops and awareness Programmes to minimize electrical accidents. <ul style="list-style-type: none"> ➤ Exhibited electricity safety slogans ➤ Conducted workshops and seminars ➤ Displayed of banners and hoardings in the public places and substations. ➤ Wide publicity given to all the consumers by Ton-Toming announcements on the safety aspects in auto every month along with the Revenue collection.
5.3.2	According to NPDCL's submission on root cause of accidents in 82 cases victims came in contact with	The Details of electrical accidents occurred during previous year is specified in Format - 2 of Performance reports. The

	live wires, in 52 cases victims died during repairing agriculture motors/service wires, in 14 cases victims were replacing DTR fuses, and in 10 cases victims touched snapped conductors. These instances show that there were shortcomings in operation of the DISCOM. In 120 cases victims died due to faulty domestic wiring or appliances. This indicates the need to create awareness among the general public on safety measures. SPDCL did not provide similar information. It mentioned that the relevant information was provided to the Commission. We request the Commission to direct SPDCL to make the information on root cause of accidents public.	DISCOM is communicating the reports to the Hon'ble Commission regularly and are made available in the TGERC website.
5.3.3	The information provided by TSDISOMs on electrical accidents show that most of the fatal accidents took place in circles with predominantly rural services. These accidents are low in urban circles. This implies that the rural consumers are not receiving quality service. Every step shall be taken to correct this anomaly.	Most of the electrical accidents are predominant in rural areas because of lack of awareness in the public. For which, the TGDISCOMs are conducting Electrical safety week in urban and rural areas for creating awareness in the consumers.
5.3.4	Though the Commission is directing the DISCOMs to take preventive steps to avoid the accidents the DISCOMs appear to be not responsive.	The TGDISCOMs are conducting awareness programs among the consumers regarding safety standards, use of electricity TO AVOID ELECTRICAL ACCIDENTS and communicated the reports to the Hon'ble Commission regularly.

5. Response to Y Chandra Sekhar Rao

5	Y Chandra Sekhar Rao , 31- SLN S Colony, Hyd. Road, Nalgonda – 508001, chandradhe54@gmail.com , Cell No. 9441280831	
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>FOUR HOURS/ONE UNIT --- COST Rs.248/-</p> <p>In ERC 2016, I requested to issue CC bills basing on days, but not of calendar month. The Hon'ble Bench directed and was implemented from the succeeding month itself. Now, I request to order to bill 30days / 24 hours basis, as 4 hours delay in obtaining reading, will lead units from 200 to 201 and CC bill will raise to Rs.1008-00 from Rs.860-00</p>	<p>At present, the DISCOM is issuing the CC bills based on no. of days which is justified for capturing the actual consumption by the consumer for the said period. It is improper to issue the bills by considering hourly basis as it is very difficult to the meter readers to maintain the timelines and which results in error computations of the consumption duly considering decimals.</p> <p>Example:</p> <p>Recorded consumption for 30 days 6 hrs = 200.4 units</p> <p style="text-align: center;">(or)</p> <p>Recorded consumption = 200.6 units</p>
2	<p>RED FLAG TO CONSUMERS::</p> <p>Now, CC Bills of LT services are being issued under HT category, whenever the connected load exceeds contracted load, duly flagging. There on, further CC bills are also being issued under HT category, though the connected load is less than the contracted load.</p> <p>To get appropriate bill under LT again, the consumer has to run to the ADE to DE to SE/Oprn., along with Divl. Eng./MRT. and there on to Corporate Office, Hyderabad, touching more than 45</p>	<p>For the HT flagged consumers, it is a regular practice to inspect the consumer premises by the DPE wing of TGSPDCL for assessing the connected load of the Consumer. If the Connected load of the consumer is found to be more than the maximum connected load of LT category, then the service connection will be billed under HT respective category else billed under LT respective category.</p>

	<p>employees. Number of cases are being filed before CGRF and also at various legal plat-forms. One of the live example is SC No.,616400242 Angadipet, Chandur Mandal, For January, 2021 CC bill was issued under HT category for exceeding contract load, and there on continued HT bills up to July, 2022, though the load is less than the contract load. CGRF ordered in case No.663/22-23, to revise from Feb.21 to July 22. But, our company filed appeal in WP No.33682/23, before Hon'ble High Court, Hyderabad, which is still pending. Though there is no wrong on the part of the consumer, the consumer is being subjected to trouble from Feb.2022, which seems to be incorrect. As such I request the kind authority to order to issue CC bill for the month under HT category, where it exceeds the contracted load, and do justice to the consumers.</p>	
3	<p>SECTION 135 OF ELEC. ACT. The DPE wing booking theft cases under Sec.135 Of I. E. Act. levying penalty nearly of Rs. One lakh, in each case, The people involved are only to pay as the levied penalty in full or to file a case in the civil Court, They are filing case in civil court and getting directions to the Company, as there is no provision to appeal to the departmental officials. As such the company is not getting revenue on one side and officials are subjected to round courts. Therefore, I request your good office to review the Section 135 and recommend appropriate relief,</p>	<p>The amendment to the provisions under section 135 is under the purview of Parliament house.</p>
4	<p>'SET ASIDE'-----EVEN AFTER 17 YEARS. I submit that during September, 2007, Internal Audit</p>	<p>The DISCOM will take steps as per the directions of the Hon'ble High</p>

	<p>levied a short fall of nearly Rs.35,000-00 on the plea of defective capacitors, against more than 20 LT services, in ERO Nalgonda. Aggrieved, the consumers approached Hon. ble High Court, Hyderabad, and got interim directions in Feb. 2008, and final orders in November, 2010, directing 'the impugned notice of shortfall is set aside'. Basing on these orders, the consumers are paying their CC bills regularly, leaving levied shortfall and accrued surcharge there on. But the department did not implement the Hon.'ble High court orders in right spirit, but displaying on the CC bills, the arrears with surcharge, accumulated month after month, Now it reached Rs.1,70,000-00, of each service.</p> <p>I request your kind authority to direct to withdraw /finalize these cases, in the light of the judgment, and relieve the consumers burden of 17 years.</p>	<p>Court</p>
<p>5</p>	<p>Three Phase sanction/ single phase supply:</p> <p>In Nalgonda district three phase services were released on Agricultural feeder, and being billed for three phase supply. But in reality, they are getting three phase supply for eight hours, and rest sixteen hours they are getting single phase supply. This amounts to deficiency in service, and being questioned in a large scale.</p>	<p>The tariff is not based on the no. of phases of supply (1-ph or 3-Ph) other than minimum charges. The DISCOM is extending 3-Ph supply to all the consumer services in its jurisdiction including agriculture feeders. It is denied that the DISCOM is extending the 3-Ph supply for 8 hrs.</p>

6. Response to South Central Railway

6	South Central Railway , Headquarters office, Electrical Department, 4 th Floor, 'C' Block, Secunderabad-500025	
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>1.0 Indian Railways is a vital and largest transport organization of Government of India, have vast network for surface transport accessible to all sections of society and play important roles in economic and financial growth of the country. Railways serve the public at large and being a public utility, it should be supplied with electricity at a reasonable price which would reduce its requirement for diesel. In the process there would be saving of foreign exchange. It will also prevent upward revision of fares for transportation of passengers and goods by the Railways. If the fare for passengers & Goods are increased to offset fuel (energy) cost, it will add to overall inflation.</p>	<p>It is to submit that the TGDISCOMs also serve the public at large and being a public utility, the TGDISCOMs should supply electricity at a reasonable rate to all its consumers consists of domestic, commercial, industrial, Railways & Traction Agriculture etc.</p> <p>The TGDISCOMs are providing reliable and quality power supply to all it's consumers duly enhancing the network covering all areas of the state since it's inception. As such it resulted in increase in tariff to all consumers..</p>
	<p>2.0 South Central Railway avails traction power through 28 TSSs at 132 kV Traction sub-stations in the state of Telangana. The total connected load is 396 MVA and total consumption of Railway traction is 1177 million units projected for the year 2024-25 and paying a substantial amount of Rs. 820 Crores to DISCOMs in Telangana state. The increase in proposed tariff for 2024-25 by Rs.1.34 per unit will result in to additional burden of Rs. 80 Crores from October -2024 to March-2025.</p> <p>3.0 The Railways is a bulk consumer and pay major revenues to TGDISCOMs. Hence, the grievances of Railways are to be considered while fixing the tariff for HT-V (A) category.</p>	<p>The TGDISCOMs are having the responsibility of taking care of its all consumers including small and bulk consumers, and proposed the tariff by considering all the pros & cons of its consumers. Without recovery of cost incurred, the DISCOMs cannot be able to supply power to bulk consumers.</p>

<p>4.0 Government of India and state governments have taken policy decisions to encourage public/private electric road vehicles for decarbonization of transport system to reduce carbon footprint and protect the environment. Government of India (Ministry of Railways) took policy decision to electrify its entire existing Railway network over Indian Railways on fast-track mode to enrich carbon free transportation.</p> <p>The hike in electricity tariff of Railway Traction will affect the operating cost of Railways, which may result in high freight charges, commodity prices and thereby rise in inflation and burdening common man and public of all sectors. Railways is a labor-intensive department, due to rise in operating cost of Indian Railways is drastically affecting the employment generation in the organization.</p>	<p>The TGDISCOMs are always striving to supply power at reasonable rates to it's consumers in Telangana state. There had been no hike in the tariff for the past decade except in FY2022-23 inspite of increase in various costs of the DISCOMs.</p>																
<p>5.0 Cost of Service for Railway Traction: The proposed Cost of service for Railway Traction is as follows:</p> <table border="1" data-bbox="441 824 1018 1015"> <thead> <tr> <th>Discom</th> <th>Cost of Service Rs/KWH</th> </tr> </thead> <tbody> <tr> <td>TGSPDCL</td> <td>5.43</td> </tr> <tr> <td>TGNPDCL</td> <td>5.24</td> </tr> <tr> <td>Average</td> <td>5.335</td> </tr> </tbody> </table> <p>The comparison of cost of service and proposed tariff for Railway traction HT-V(A) category is given below.</p> <table border="1" data-bbox="409 1136 1186 1279"> <thead> <tr> <th>Year</th> <th>COS of Discoms</th> <th>Proposed Traction tariff</th> <th>% Variation</th> </tr> </thead> <tbody> <tr> <td>2024-25</td> <td>5.335/KWH</td> <td>8.23/KVAH</td> <td>54%</td> </tr> </tbody> </table> <p>From above, it may be seen that the traction tariff is higher by 54% over cost of service which is against the provisions of National Tariff policy.</p>	Discom	Cost of Service Rs/KWH	TGSPDCL	5.43	TGNPDCL	5.24	Average	5.335	Year	COS of Discoms	Proposed Traction tariff	% Variation	2024-25	5.335/KWH	8.23/KVAH	54%	<p>The consumer expected to draw only active power from the grid and avoid to inject/draw reactive power from the grid to avoid overloading of the network.</p> <p>The proposed tariff for traction service is within 20% of ACoS of state in line with national Tariff Policy 2016.</p> <p>As per the RST orders issued by the Hon'ble Commission from time to time, the fixed costs commitments of Generation, Transmission and Distribution systems are being recovered partly through Demand Charges from HT Consumers & Fixed Charges from LT</p>
Discom	Cost of Service Rs/KWH																
TGSPDCL	5.43																
TGNPDCL	5.24																
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Year	COS of Discoms	Proposed Traction tariff	% Variation														
2024-25	5.335/KWH	8.23/KVAH	54%														

	The COS is being calculated in terms of KWh and energy is being charged for Railway traction in terms of KVAh.				Consumers to the extent of less than 30% though the consumers maintaining the contract demand with Distribution Licensee.
<p>6.0 National Tariff Policy :</p> <p>National tariff policy para 8.3 {2) states that "for achieving the objective that the tariff progressively reflects the cost of supply of electricity, the appropriate commission would notify a roadmap such that tariffs are brought within + 20% of the average cost of supply. The road map would also have intermediate milestones, based on the approach of a gradual reduction in cross subsidy."</p> <p>a. The tariffs were to be fixed within $\pm 20\%$ of the average cost of service. From table in Para 5.0, it is noted that % difference between the average cost of service of the two DISCOMs and the traction tariff proposed is 54% more, which is in contravention to the National Tariff Policy.</p> <p>7.0 Traction Tariff Proposed for 2024-25 :</p>					
Year	Demand Charges Rs/ KVA	Energy Charges Rs/ KVAh	Average unit cos Rs/KVAH	Amount & % of Increase	
2023-24 (Present)	475	5.05	6.89	Rs. 1.34 & 19.45%	
2024-25 (Proposed)	500 (5.26%increase)	6.25 (23.76%increase)	8.23 (19.45%increase)		In order to ensure cost recovery, the licensees have proposed to increase in tariff in light of increase of costs.
<p>The increase in railway traction tariff of Rs. 1.34/Unit (19.45%) is very high, highly unreasonable and unjustified. Higher traction tariff slashes Rate of Return (ROR) for the new electrification projects and existing electrification projects which are</p>					

under progress which are making them non- viable.

- Tariff Schedule of Hyderabad Metro Rail (HMR) and Indian Railways:

Consumer	Existing Tariff			Proposed Tariff		
	Demand Charges Rs/KVA	Energy Charges Rs/KVAh	Average unit rate Rs/KVAh	Demand Charge Rs/KVA	Energy Charges Rs/KVAh	Average unit rate Rs/KVAh
HMR-HT-V(B)	475	4.95	6.84	500	4.95	6.93
Railways HT-V(A)	475	5.05	6.93	500	6.25	8.23
% increase over HMR			1.32			18.76

It is evident from the preceding data that there is already a 1.32% more difference in the current tariff between HMR and Railways. Further, the railway tariff in the proposed tariff is about 18.76% higher than the HMR. The 18.76% tariff difference and biases when compared with HMR are completely discriminatory, unreasonable and unjustified. Further, it is worth to mention that SC Railways operates train services around the clock both during the day and at night, contributing to maintain and increase grid stability during off-peak load hours, whereas HMR operates only with a fixed load during the day and no load during the night.

<p>8.0 Electrification of more sections in Telangana: By way of electrification of Railway network in Telangana additional infrastructure will be added, resulting into faster movement of goods and passenger traffic. Ultimately there is every possibility of upcoming industries in Telangana state. Due to reasonable traction tariff for the last two years many Electrification projects could be justified and successfully completed in Telangana State. Further, many new electrification projects are still under process and which can be sanctioned only if the traction tariff remains reasonable.</p> <p>8.1 Electrification projects recently completed: Electrification Projects completed in last 3 yrs.: 953 Kms</p> <ol style="list-style-type: none"> I. Peddapalli - Nizamabad: 178 Km II. Falaknuma- Mahbubnagar Doubling with Electrification:98 Km. III. Malkajgiri - Medchal doubling with Electrification: 24 Kms. IV. Mahbubnagar - Kurnool Town: 128 Km. V. Medchal - Dharmabad : 166 Km. VI. Devarakhadra - Krishna: 65 Km VII. Janakampet - Bodhan : 27 Km. VIII. Moulali - Ghaktkesar (Quadruppling): 24 Km. IX. Kazipet - Ballaharsha (Tripling): 164 Km. x. Vikarabad - Matakunta: 79 Km. <p>8.2 Electrification projects under progress: 157 Km.</p> <ol style="list-style-type: none"> i. Kazipet - Balharshah (Tripling): 40 Km ii. Kazipet - Vijayawada (Tripling): 100 Km iii. Akanapet - Medak: 17 Km <p>8.3 Electrification projects sanctioned: 76 Km.</p> <ol style="list-style-type: none"> i. Manoharabad - Siddipet: 76 RKM <p>8.4 Electrification projects under proposal stage and yet to be sanctioned: 696 Km.</p> <ol style="list-style-type: none"> i. Siddipet - Kothapalli: 73 Km. ii. Sattupalli - Kovvur: 95 Km. 	<p>The TGTRANSCO and TGDSICOMs have invested Rs.35000 cr for enhancements of electrical network to make accessible to its consumers and the recovery of such cost is inevitable to run its operations.</p>
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<p>iii. Manugur - Ramagundam: 200 Km. iv. Macherla - Nalgonda: 92 Km. v. Kondapalli - Kothagudem: 125 Km. vi. Kazipet - Ghatkesar: 110 Km.</p> <p>Above New Line project sections are planned to be electrified in Telangana state. Any increase in traction tariff will affect badly and not viable the upcoming electrification projects and slow down the existing projects also in Telangana state and effects the development of infrastructure works in the state of Telangana.</p> <p>Further, Railway Board have chosen Railway network work over Telangana region to upgrade the traction system from existing 1x25 KV system to 2x25 KV system to enhance existing carrying capacity to realize Mission 3000 MT master plan of PMO office by which connecting loads and demand will be increased resulting in increase in demand and energy consumption.</p>	
<p>9.0 Incentive on Prompt/early payment: Railways are prompt in payment of energy bills to the DISCOMs and for these, Railways certainly deserve some rebate/incentive. Reasonable rebate/incentive for prompt payment be granted as done in Odisha state. In Odisha, Railways entitled to a rebate of 1% (one percent) of the amount of monthly bill (excluding all arrears).</p> <p>10.0 Off peak time loads for Railway Traction: It is to mention that Railway traction is power intensive, and loads are for passenger & goods train services which are run round the clock. There is no distinction of peak to non-peak hours. Thus Railways are improving base loads of DISCOMs and supporting the grid stability. Apart from this, Railways is maintaining higher power factor.</p> <p>11.0 Railways Planning to avail traction power through open access.</p> <ul style="list-style-type: none"> • It is brought to the kind notice of the Hon'ble commission; Indian Railways are already availing power through "Open access" in 	<p>The TGDSICOMS are grateful to have such prompt consumers like Indian Railways.</p> <p>Rebate in tariff to particular category of consumers is not in the purview of TGDISCOMs.</p> <p>The Deemed Distribution Licensee status for Indian Railways was withheld by Hon'ble APTEL in its judgment.</p>

<p>12states. The "Deemed Distribution Licensee" status of Railways is under sub-judise at Hon'ble Supreme Court. However, Hon'ble Supreme Court in its interim order dated 06.05.2024, clarified that open access for Railways shall not be denied and cross subsidy and additional surcharges are not applicable to be paid till final order of the Hon'ble Supreme Court.</p> <ul style="list-style-type: none"> As per Section 39, 2 (d) Indian Electricity Act-2003, STU to provide non-discriminatory open access to its transmission system for use by any consumer as and when such open access is provided by the State Commission under sub-section (2) of section 42, on payment of the transmission charges and a surcharge thereon, as may be specified by the State Commission. 	<p>As per the provisions in the Electricity Act 2003 under section 42(2) & 42(4) any Open Access consumer is required to pay CSS& AS determined by the Hon'ble Commission in its Tariff orders including Indian Railways.</p>
<p>12.0 Railways prayed:</p> <ul style="list-style-type: none"> Due to kind consideration of Hon' ble commission the traction tariff has been fixed for Railway traction at par with Open access tariff in Telangana state for the last two years. In view of reasonable traction tariff most of the routes in Telangana state got sanctioned for electrification. Railway Electrification is environment friendly, energy efficient and reduces carbon footprint, which further reduces the import burden of high-speed diesel. Proposed increase in traction tariff for Railways will affect all the ongoing electrification projects which are under progress in the state of Telangana and slow down the existing projects. This will have a detrimental effect on the electrification projects and other infrastructure projects in the state of Telangana. In this circumstance, proposed tariff by TG Discerns equivalent charges of Rs 8.23 /KVAh (with average load factor 35%) is very high, unreasonable and unjustified. Higher tariff compared to "open access" and HMR tariff, over burdens the bulk consumer like Railways. 	<p>In order to ensure cost recovery, the licensees have proposed to increase in tariff in light of increase of costs.</p>

<p>13.0 Conclusion:</p> <p>Railway traction provides base load, maintained high power factor and save imported precious oil, apart from speedy, energy efficient and environmentally friendly public transport.</p> <p>Encouragement for new electrified sections for development of infrastructure in the state of Telangana and also act as growth engine for the economy of country largely.</p> <p>Keeping the above in view, Hon'ble commission is requested to consider and it is prayed that,</p> <p>a) The tariff under category HT-V (A) Railway traction is to be retained for the above-mentioned reasons as per the provisions of National Tariff Policy, to encourage electrification projects in Telangana state.</p> <p>b) Railway Traction Tariff in line with HMR, may be considered to avoid disparity, discrimination and injustice between the two public transport systems.</p> <p>c) Railway Traction tariff reduction may be considered by exempting Railways from the burden of cross subsidy surcharge by virtue of provisions contained in the National Tariff Policy issued by Ministry of Power on 28thJanuary -2016.</p> <p>d) To give impetus to electrification of Railway network, it is requested to consider the reasonable rebate/ incentives for prompt payment of monthly energy bills.</p> <p>e) Hon'ble Commission is pleaded to consider Railways objections and requested to retain the existing tariff schedule for Railway Traction or may be considered on par with HMR, as Railways is a bulk consumer and prompt payer of energy bills.</p>	<p>The replies to this has already been answered above</p>
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7	Sri. P. Ravi Kumar, Director (Technical), HMWS&SB , Khairatabad, Hyderabad 500 004. Email: ravikumar.pulumati@hvderabadwater.gov.in, Phone/Mobile No.: 9989995779	
S.No.	Summary of Objections / Suggestions	Response of the Licensee
	i) <u>Sanction</u> : HMWSSB requests the Hon'ble TSERC to continue to sanction concessional Power Tariff at the rate of Rs.4.95 paise per kWh for the FY 2023-24 onwards on perpetual basis.	Without extending subvention amount from the GoTG to DISCOMs, it is not possible to provide concessional tariff to HMWSSB. The DISCOMs are not getting the subvention amount from GoTG regularly. Hence, the Commission is requested to retain the tariff for HMWSSB under industrial category. Alternatively, the Commission is requested to direct the HMWSSB to receive the subvention amount by themselves and pay the bills to the Licensee as per the Tariff Order to avoid any disputes.
	ii) <u>Special category</u> : As was observed by the Hon'ble TSERC in its Orders passed on the earlier occasions, we request to allot a Special Category for sanction of concessional Power Tariff for HMWSSB exclusively in line with HMRL	
	iii) The facility of concessional Power Tariff may also be extended to (a) all STP stations, and (b) all Office Buildings.	The concessional power tariff for STP stations and office buildings under industrial category is against the terms of the Tariff Order applicable for the relevant categories.
	iv) <u>Subvention</u> : Since financial year 2022-23, TG Govt has not released subvention	The subvention amount committed by the GoTG has not been received by the DISCOMs regularly and

	<p>amounts of HMWSSB payable to TS DISCOMs. In line with TGERC orders, TSSPDCL have raised power bills for HMWSSB as per Cat-1(E) (Normal) instead of Cat-V(B) (Concessional). In spite of Govt assurance and TSERC orders, HMWSSB has not been extended the Concessional Power Tariff due to non - release of subvention amount by the State Government.</p> <p>The Hon'ble TGERC's kind attention is drawn to the letter of GoTS, Energy Department vide letters dated 30.06.2022 & 06.03.2023, wherein GoTS has invoked Section-108 of the Electricity Act, 2003 while assuring that it would take care of payment of Subvention amount for the past and future period and compensate DISCOMs suitably.</p>	<p>therefore, the DISCOMs face shortage of funds. Therefore, the Hon'ble Commission is requested to direct the HMWSSB to receive the subvention amount by themselves and pay the bills to the Licensee as per the Tariff Order to avoid any disputes.</p>
	<p>v) HMWSSB has already requested the GoTS for extending facility of concessional Power Tariff to HMWSSB for the FY 2024-25 onwards on perpetual basis and also extend the facility to (a) all STP stations, and (b) all office Buildings. A copy of the letter No. 219 dated.13.07.2022 is enclosed for perusal as Annexure-7</p>	<p>The concessional power tariff for STP stations and office buildings under industrial category is against the terms of the Tariff Order applicable for the relevant categories.</p>

8. Response to GMR Hyderabad International Airport Limited

8	GMR Hyderabad International Airport Limited , GMR Aero Towers, Rajiv Gandhi International Airport, Shamshabad, Hyderabad – 500 108																												
S.No.	Summary of Objections / Suggestions			Response of the Licensee																									
1	<p>Increase in Energy Charges for HT-III (Airport, Bus Station and Railway Stations) – TGSPDCL proposes to increase the energy charges for HT-III category at par with that of HT-II Commercial category.</p> <p>Comment: The proposed hike in energy charges for HT-III, making it at par with Commercial HT-II (please refer to the table below) is unprecedented and exorbitant and in conflict with the orders passed by this Hon'ble Commission and by Hon'ble Appellate Tribunal of Electricity (APTEL).</p> <table border="1" style="width: 100%; border-collapse: collapse; margin: 10px 0;"> <thead> <tr> <th style="width: 15%;"></th> <th style="width: 15%;">Existing Tariff</th> <th style="width: 15%;">Proposed Tariff for Fy 2024-25</th> <th style="width: 15%;">Existing Tariff</th> <th style="width: 15%;">Proposed Tariff for Fy 2024-25</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Voltage Level</td> <td style="text-align: center;">Aviation (HT-III)</td> <td style="text-align: center;">Aviation (HT-III)</td> <td style="text-align: center;">Commercial (HT-II)</td> <td style="text-align: center;">Commercial (HT-II)</td> </tr> <tr> <td style="text-align: center;">11KV</td> <td style="text-align: center;">8.50</td> <td style="text-align: center;">8.80</td> <td style="text-align: center;">8.80</td> <td style="text-align: center;">8.80</td> </tr> <tr> <td style="text-align: center;">33KV</td> <td style="text-align: center;">7.85</td> <td style="text-align: center;">8.80</td> <td style="text-align: center;">8.00</td> <td style="text-align: center;">8.80</td> </tr> <tr> <td style="text-align: center;">132KV & Above</td> <td style="text-align: center;">7.45</td> <td style="text-align: center;">8.80</td> <td style="text-align: center;">7.80</td> <td style="text-align: center;">8.80</td> </tr> </tbody> </table> <p>At this juncture, it is pertinent to mention here that as per the Judgement of Hon'ble APTEL dated 22 July 2021 in appeal No. 12 of 2011 (G.M.R. Hyderabad International Airport Ltd. Vs. Andhra Pradesh Electricity Regulatory Commission & Anr.) herein Hon'ble APTEL held that Airports could not be put in the commercial category and on the</p>				Existing Tariff	Proposed Tariff for Fy 2024-25	Existing Tariff	Proposed Tariff for Fy 2024-25	Voltage Level	Aviation (HT-III)	Aviation (HT-III)	Commercial (HT-II)	Commercial (HT-II)	11KV	8.50	8.80	8.80	8.80	33KV	7.85	8.80	8.00	8.80	132KV & Above	7.45	8.80	7.80	8.80	<p>The tariff for HT-III category at 11kV was increased by ~3.5% (30 paise / unit) to INR 8.8 per unit and subsequently the tariff was rationalized across the various voltages. The tariffs for both HT-II and HT-III were not made same by design, and was arrived at independently. Further, the future trajectories of the HT-II and HT-III are not expected to be the same and will be determined independently based on Average cost of supply for the licensee determined every year</p> <p>The licensee would bring to the notice of the Hon'ble Commission that projected Average Cost of Supply for FY 2024-25 for the licensee is higher than approved Average Cost of Supply for FY 2023-24. In order to ensure cost recovery, the</p>
	Existing Tariff	Proposed Tariff for Fy 2024-25	Existing Tariff	Proposed Tariff for Fy 2024-25																									
Voltage Level	Aviation (HT-III)	Aviation (HT-III)	Commercial (HT-II)	Commercial (HT-II)																									
11KV	8.50	8.80	8.80	8.80																									
33KV	7.85	8.80	8.00	8.80																									
132KV & Above	7.45	8.80	7.80	8.80																									

<p>other hand must be put in a separate category and different tariffs should be determined as per direction of the Appellate Tribunal of Electricity.</p> <p>Accordingly, based on TGSPDCL Load Assessment Report and complexities in segregation of airport loads, the Hon'ble Commission vide its earlier order dated 30 March 2012 had created a separate tariff category for airports i.e. HT-III category and fixed a composite tariff at a ratio of Aviation loads at 61% and Commercial loads at 39%.</p> <p>However, with respect to the Hon'ble Commission's directives to TGSPDCL and TGSPDCL's request thereon, GHIAL took steps for implementing segregation of the non-aviation loads and aviation loads outside the terminal at source level and a new 220/33kV Substation was built by GHIAL at a cost of around INR 15 Crores, which was handed over to TGTRANSCO to facilitate the segregation of loads and this Substation was energized by TGTRANSCO on 22nd July, 2020.</p> <p>Thereafter, GHIAL applied to TGSPDCL for two new HT services (HT-II Commercial and HT-I Industrial) from the aforesaid Substation. Consequently, all major non-aviation loads from the airport network were segregated by laying separate network at an additional cost and got the connected to the new HT Service connections in presence of TGSPDCL officials. With the above, Airport now has three HT Services with separate metering at Source Level.</p>	<p>licensees have proposed to increase in tariff in light of increase of costs.</p>
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- HT-III Aviation Service at 220 kV Voltage
- HT-II Commercial Service at 33 kV Voltage
- HT-I Industrial Service at 33 kV Voltage

With the above, segregation of major non-aviation loads from the existing aviation network at source level (DISCOM's metering point) as requested by TGSPDCL for complying to the directives of Hon'ble Commission is completed. While so, smaller non-aviation loads at lesser voltage levels are not feasible for segregation at source level, due to the complexities involved in existing distribution network. For these loads such as advertisement hoardings across main access road and BPCL petrol bunk, separate energy meters were installed by TGSPDCL at consumption level and being billed at the applicable rates in the main bill.

Since the major non-aviation loads have been segregated and resultantly, the load pattern ratios have changed as per table provide^{3d} herein below and GHIAL had already submitted details of the of the said loads with TGSPDCL their perusal and the necessary revision and yet no revision has been made.

SI No	Type of Load	Before Load Segregation	After Non-Aviation Load Segregation
1	Aviation	61%	80%
2	Non-Aviation	39%	20%

In view of the above, the proposal of TGSPDCL of equating energy

	charges for HT-III category at par with the energy charges for HT-II commercial tariff category is arbitrary and contrary to earlier directions issued by Hon'ble APTEL and by this Commission and should not be considered.	
2	<p>As per para 11.2.5 (HT-III) Airports, Bus Stations and Railway Stations The licensee proposes an increase in demand charge for all voltage levels (11kV, 33kV, 132kV&above) and an increase in energy charges making it same for all voltage levels (11kV, 33kV, 132kV & above)</p> <p>Comment: The proposed increase in energy charges for consumers having energy meters at 220kV, 33kV and accounting for all transformer and distribution losses, applying an 11kV voltage level tariff isn't justified and disregards the technical differences. This discrepancy may lead to unfair pricing and affect consumer interests as a common tariff might not accurately reflect the actual energy costs and losses associated with different voltage levels.</p>	DISCOM is proposing to migrate to uniform wheeling charges and losses across all voltage levels similar to the practice followed for Inter-State and Intra-State transmission systems. Similarly on the retail supply side, tariffs are being rationalized across all voltage levels

9. Response to Federation of Telangana Chambers of Commerce and Industry

9	Federation of Telangana Chambers of Commerce and Industry , Federation House, Federation Marg, 11-6-841, Red Hills, Hyderabad – 500 004	
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	The instant petitions have been filed by TG discoms for the determination of ARR & Wheeling Tariffs for Distribution Business for FY 2024-29 and determination of ARR for Retail Supply Business for FY 2024-29 & Tariff Proposals for FY 2024-25. The instant petition has been filed by both the discoms under the Telangana State Electricity Regulatory Commission (Multi Year Tariff) Regulation, 2023 (MYT Regulations 2023).	Noted.
2	Multi-year Tariff for FY 2024-29 – Regulation 6 of the TSERC (Multi Year Tariff) Regulation, 2023 provides for the filing of the MYT petition by 30th November. The relevant extracts of the same are reproduced as under: <i>“6 Procedure for filing Petition 6.2 The petitions to be filed for each Control Period under this Regulation areas under: b) Multi Year Tariff petition shall be filed by 30th November of the year preceding the first year of the Control Period by transmission licensee, distribution licensee (for wheeling business) and SLDC comprising: i. True-up of preceding year; ii. Aggregate Revenue</i>	When the Regulation No.2 of 2023 was notified on 30.12.2023, the TGDISCOMs were seeking clarifications on certain clauses of the new MYT Regulation No.2 of 2023 as there was huge impact on the financials of the DISCOMs and also there was a change in regulatory regime because of which DISCOMs needed to collect additional data for preparing the petitions, then the TGDISCOMs have initiated the process of collecting the required data from the various

<p><i>Requirement for each year of the Control Period; iii. Proposal of Tariff and Charges for each year of the Control Period. c) Multi Year Tariff petition shall be filed by 30th November of the year preceding the first year of the Control Period by distribution licensee(for retail supply business) comprising: i. True-up of preceding year; ii. Aggregate Revenue Requirement for each year of the Control Period; iii. Revenue from retail sale of electricity at existing tariffs & charges and projected revenue gap for the first year of the Control Period; iv. Proposal of consumer category wise retail supply tariff and charges for first year of the Control Period:</i></p> <p>Provided that the Multi Year Tariff petitions for the Control Period commencing from 01.04.2024 shall be filed by generating entity, transmission licensee, distribution licensee and SLDC on or before 31.01.2024.”</p> <p>Based on the above, it is clear that the instant petition lacks on 2 fronts:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The Licensees have not filed the application for the True up of previous year (which is FY 2022-23) for Distribution and Retail Supply business (ref Regulation 6.2(b)(i) and 6.2(c)(i) respectively). 	<p>wings for which it took time.</p> <p>Subsequently, the Gruhajyothi Scheme was announced by the GoTG which further delayed the process of Filings of ARR. Meanwhile, Model code of conduct came into force, due to which the TGDISCOMs could not file the ARR filings. The DISCOMs have duly submitted the condonation of delay petition before the Hon’ble Commission stating these reasons.</p> <p>The filings of true up application would be filed separately along with Annual Performance Review of Distribution Business for FY 2023-24</p>
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	<p>□ the Petitioner has filed the instant Petition after a prolonged delay of ~10 months (July 2024 and September 2024 respectively for Distribution and RST business)) which in the opinion of the Objector is not appropriate. The reasoning put forth by the Licensees seems to be an afterthought to cover up for the substantial delay caused at the Licensee's end.</p> <p>On account of instant filings in non-compliance of the MYT Regulations 2023, the Petitioner's submissions merit non-consideration.</p>	
3	<p>The Hon'ble Commission in the Order dated 07.06.2024 in the matter of Annual Performance Review of Distribution Business for FY 2022-23 has approved a Revenue Surplus of Rs. 1736.34 crore and Rs. 2227.42 Crore for TGSPDCL and TGNPDCL respectively. The relevant extracts from such Order is as under:</p> <p><i>"4.12 RECOVERY OF REVENUE GAP/(SURPLUS) 4.12.1 As per Clause 10.5 of Regulation 04 of 2005 the Commission directs the Applicant to include and propose the adjustment mechanism of the total approved revenue surplus for TGSPDCL for Rs. 1736.34 crore (gap of Rs.20.54 crore for FY 2019-20, surplus of Rs. 253.05 crore for FY 2020-21, surplus of Rs. 1114.66 crore for FY 2021-22 and surplus of Rs. 389.17 Crore for FY 2022-23) and revenue surplus for TGNPDCL for Rs. 2227.42 Crore(surplus of</i></p>	<p>Clause 4.12.1 of order dated 07.06.2024 on Annual Performance Review of Distribution Business states that the adjustment mechanism of the total approved revenue surplus is to be proposed in the end of control period review petition for 4th Control Period. The last petition for 4th Control period i.e., for FY 2023-24 is yet to be filed by TG Discoms wherein the adjustment mechanism would be provided as per directions given in the aforementioned order.</p>

	<p><i>Rs.384.76 Crore for FY 2019-20, surplus of Rs. 354.02, surplus of Rs. 634.03 Crore and surplus of Rs 854.62 Crore) in its end of control period review petition for 4th control period. This Order is corrected and signed on this the 7th day of June, 2024.”</i></p> <p>It is mentioned that the impact of Revenue Gap pertaining to the True up of FY 2019-20 to FY 2022-23 has to be passed in the Retail supply business. The Hon’ble Commission is sincerely submitted to consider the impact of True up of Distribution business in the RST for FY 2024-25.</p>	
4	<p>The petitioner (TGSPDCL) has claimed asset additions to the tune of Rs. 31,589 Crore for the Control period FY 2025-29 which is significantly high compared to the actual Capital Cost capitalized by the Distribution Licensees in the previous control period (FY 2019-24). Notably, such high level of projections for Capital cost is injurious to the financial health of the Distribution licensees as non-capitalization of the projected capital cost would effectively result into the revenue surplus which is against the principles of reasonable cost recovery.</p>	<p>The proposed asset additions has been estimated on the basis of the growth in sales, and the required infrastructure to support such growth in sales. Further, the Licensee submits that the proposed asset additions would be capitalized as per prevailing regulations / norms and the same will be reflected in the true-up’s for the respective time period.</p>

10. Response to Telangana and Andhra Plastics Manufacturers Association

10	Telangana and Andhra Plastics Manufacturers Association , 914, 9 th Floor, Raghava Ratna Towers, Chirag Ali Lane, Abids, Hyderabad – 500 001	
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>With reference to the subject matter, TELANGANA AND ANDHRA PLASTICS MANUFACTURERS ASSOCIATION (TAAPMA) will be submitting the detailed comments / objections on the petitions filed by TG Genco and TG DISCOMs, at the time of public hearing on TG Genco 5th MYT petition and TGDISCOMs ARR and Wheeling charges for 5th MYT Period and FPT and CSS for FY 2024-25, as the time is very less for submitting the same.</p> <p>We request the Hon'ble Commission to accept our request give us the opportunity to appear in person at the Public Hearing on 21st and 23rd of October, 2024.</p>	Noted.

11. South Indian Cement Manufacturers Association

11	South Indian Cement Manufacturers Association	
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>The TGDISCOMS have submitted petitions for determining the ARR and Wheeling Tariffs for their Distribution Businesses for FY 2024-29, as well as for the ARR of the Retail Supply Businesses for the same period and Tariff Proposals for FY 2024-25. These petitions are filed under the Telangana State Electricity Regulatory Commission (Multi-Year Tariff) Regulation, 2023 (MYT Regulations 2023).</p>	No comments
2	<p>According to Regulation 6 of the TSERC (MYT Regulations 2023), Multi-Year Tariff petitions must be filed by November 30 of the year preceding the first year of the Control Period. The pertinent details include:</p> <ul style="list-style-type: none"> • Filing Requirements for Distribution Licensees: • True-up of the preceding year • Aggregate Revenue Requirement for each year of the Control Period 	<p>There was a change in regulatory regime because of which DISCOMs needed to collect additional data for preparing the petitions. Moreover, due to the enforcement of model code of conduct, the DISCOMs could not file the petition. The DISCOMs have duly submitted the condonation of delay petition before the Hon'ble Commission stating these reasons</p> <p>The filings of true up application for distribution</p>

<ul style="list-style-type: none"> • Tariff and Charges proposal for each year of the Control Period • Filing Requirements for Retail Supply Licensees: • True-up of the preceding year • Aggregate Revenue Requirement for each year of the Control Period • Projected revenue gap for the first year of the Control Period • Proposal for consumer category-wise retail supply tariff and charges for the first year of the Control Period <p>The regulations stipulate that Multi-Year Tariff petitions for the Control Period starting April 1, 2024, must be filed by January 31, 2024. The current petitions fall short in two critical areas:</p> <ul style="list-style-type: none"> • The Licensees have not included the True-up application for the previous year (FY 2022-23) for both Distribution and Retail Supply (refer to Regulations 6.2(b)(i) and 6.2(c)(i)) <p>The petitions have been submitted approximately 10 months late (July 2024 and September 2024 for Distribution and Retail Supply respectively), which the Objector believes is unjustifiable. The reasons provided by the Licensees appear to be an attempt to rationalize this significant delay. Due to these non-compliant</p>	<p>and retail supply business would be filed separately along with Annual Performance Review of Distribution Business for FY 2023-24.</p>
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	filings with the MYT Regulations 2023, the submissions from the Petitioner should not be considered.	
3	<p>In the Order dated June 7, 2024, concerning the Annual Performance Review of Distribution Business for FY 2022-23, the Hon'ble Commission approved a Revenue Surplus of Rs. 1,736.34 crore for TGSPDCL and Rs. 2,227.42 crore for TGNPDCL. The relevant excerpt states:</p> <p>4.12 Recovery of Revenue Gap/(Surplus)</p> <p>4.12.1 As per Clause 10.5 of Regulation 04 of 2005 the Commission directs the Applicant to include and propose the adjustment mechanism of the total approved revenue surplus for TGSPDCL for Rs. 1736.34 crore (gap of Rs. 20.54 crore for FY 2019-20, surplus of Rs. 253.05 crore for FY 2020-21, surplus of Rs. 1114.66 crore for FY 2021-22 and surplus of Rs. 389.17 crore for FY 2022-23) and revenue surplus for TGNPDCL for Rs. 2227.42 crore (surplus of Rs. 384.76 crore for FY 2019-20, surplus of Rs. 354.02, surplus of Rs. 634.03 crore and surplus of Rs 854.62 crore) in its end of control period review petition for 4th control period. This Order is corrected and signed on the 7th day of June, 2024.**</p>	<p>Clause 4.12.1 of order dated 07.06.2024 on Annual Performance Review of Distribution Business states that the adjustment mechanism of the total approved revenue surplus is to be proposed in the end of control period review petition for 4th Control Period. The last petition for 4th Control period i.e., for FY 2023-24 is yet to be filed by TG Discoms wherein the adjustment mechanism would be provided as per directions given in the aforementioned order.</p>

	It is emphasized that the impact of the Revenue Gap related to the True-up from FY 2019-20 to FY 2022-23 should be reflected in the Retail Supply Tariff for FY 2024-25.	
4	TGSPDCL has projected asset additions totaling Rs. 31,589 crores for the Control Period FY 2024-29, which is considerably higher than the actual Capital Cost capitalized by the Distribution Licensees during the previous control period (FY 2019-24). Such high projections for Capital Cost may adversely affect the financial health of the Distribution Licensees, as failure to capitalize the projected costs would lead to revenue surplus, contradicting the principles of reasonable cost recovery.	The proposed asset additions has been estimated on the basis of the growth in sales, and the required infrastructure to support such growth in sales. Further, the Licensee submits that the proposed asset additions would be capitalized as per prevailing regulations / norms and the same will be reflected in the true-up's for the respective time period.

12. Telangana Spinning and Textile Mills Association

12	Telagana Spinning and Textile Mills Association	
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>Referring to the subject cited, this is to bring to the notice of the Hon'ble Commission that, they said filings were uploaded on the websites of either TGERC or on TGSPDCL with a delay of two days after the notice published in Newspapers.</p> <p>Since the availability of information is delayed by two days, and keeping in view the Dasara Festival from October 2nd (Dasara Navaratrulu) and 11th October, the last date for submission of comments and objections being a festival day, we request the Hon'ble Commission to extend the last date for submission of comments.</p> <p>TG Transco has also filed the ARR and proposed charges for Transmission Business and SLDC for FY 2024-25 to FY 2028-29 and the last date for submission of the comments is again 11/10/2024.</p> <p>Keeping in view the enormity of the data to be analysed and the huge amount of work involved, it is difficult to complete the work by 11th October as the number of working days are also few due to festival days.</p>	<p>The Hon'ble Commission is requested to finalize the ARR and Tariff based on the filings of DISCOMs in order to overcome further financial burden on account of increase in power purchase cost experienced day to day by the DISCOMs.</p>

	<p>Therefore, we request the Hon'ble Commission to extend the last date for submission of comments by 10 working days, i.e. from 11thOctoberto24thOctober2024.</p> <p>Your positive consideration will give sufficient time to the objectors to provide meaningful objections on the filings of TG Transco and TG DISCOMs.</p>	
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13. Telangana Iron & Steel Manufacturers Association

13	Telangana Iron & Steel Manufacturers Association	
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>We are very much thankful to your good office for supporting our industry from time and again.</p> <p>With reference to the subject mentioned above, I would like to bring to the kind attention of the Hon'ble Commission that the filings made by TSSPDCL and TSNPDCL on the determination of ARR and Wheeling Tariff for the Distribution Business for the 5th Control Period (FY 2024-25 to FY 2028-29) were uploaded on the websites of TSERC and TSSPDCL two days after the notice was published in the newspapers.</p> <p>Given this delay and considering the Dasara festival, which falls between October 2nd (Dasara Navaratrulu) and 11th October, the last date for submitting comments and objections coincides with the festival day. Hence, we kindly request the Hon'ble Commission to extend the deadline for submission.</p> <p>Additionally, TG Transco has also filed the ARR and proposed charges for Transmission Business and SLDC for the same period, with the deadline for comments also being 11th October 2024.</p>	<p>The Hon'ble Commission is requested to finalize the ARR and Tariff based on the filings of DISCOMs in order to overcome further financial burden on account of increase in power purchase cost experienced day to day by the DISCOMs.</p>

	<p>Given the volume of data to be analyzed and the reduced number of working days due to the festival, it will be challenging to prepare and submit comprehensive comments by the current deadline. Therefore, we respectfully request that the Hon'ble Commission extend the deadline for submission of comments by 15 working days, from 11th October to 31st October 2024.</p>	
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14. 5 వ నియంత్రణ కాలము యొక్క ఆర్థిక సంవత్సరాలకు (2024-25 నుండి 2028-29వరకు) రిటైల్ సప్లయ వ్యాపారము కోసము సమగ్ర ఆదాయ ఆవశ్యకత మరియు 2024-25 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి, ధరల ప్రతిపాదనలు & క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనలపై శ్రీ శశి భూషణ్ కాచేగారి సూచనలు/సలహాలకు సమాధానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	టీజీఎస్పీడిసిఎల్ - సమాధానాలు
1.	<p>విద్యుత్ ప్రమాదాల నివారణకు పటిష్టమైన చర్యలు చేపట్టాలి. రక్షణ వ్యవస్థను బలోపేతం చేసి ప్రమాదాలు నివారించాలి. విద్యుత్ ప్రమాదాలలో నష్టపోయిన / మృతిచెందిన వ్యక్తులకు కుటుంబాలకు సత్వరం ఎక్స్సెసి యాఅందించాలి. పశువులు నష్టపోయినవారికి సత్వరం ఎక్స్సెసి యాఅందించాలి.</p>	<p>విద్యుత్ ప్రమాదంలో నష్టపోయిన/మృతిచెందిన కుటుంబాలకు గౌరవ కమిషన్ నిర్ధారించిన ఎక్స్ గ్రేషియా ను చెల్లించటం జరుగుతోంది. అలాగే ప్రమాదాల నివారణ చర్యలలో భాగముగా వినియోగదారులకు టీజీఎస్పీడిసిఎల్ ద్వారా అనేక అవగాహన కార్యక్రమాలు మరియు ప్రకటనలు నిర్వహించబడుతున్నాయి మరియు భద్రతా పరమైన చర్యలు కుడా టీజీఎస్పీడిసిఎల్ ద్వారా తీసుకోబడుతున్నాయి</p>
2.	<p>HT - 3 కేటగిరీలో ఏయిర్పోర్ట్, బస్సు స్టేషన్, రైల్వే స్టేషన్ ను ఒకటే జతన ప్రతిపాదించారు. దీని నుండి ఏయిర్పోర్టు వేరు చేయాలి</p>	<p>గౌరవనీయమైన కమిషన్ వారి ఆదేశాలను అమలు చేయటం జరుగుతుంది</p>
3.	<p>టారిఫ్ ప్రతిపాదనలపై సలహాలు:</p> <p>1. క్రమం తప్పకుండా గడువులోగా విద్యుత్ పంపిణీ సంస్థలు సమగ్ర ఆదాయ ఆవశ్యకత సమాచారం (ఏఆర్ ఆర్) కమిషన్కు సమర్పించటంలో జాప్యానికి గల కారణాలు</p> <p>2. రాష్ట్ర ప్రభుత్వం అమలు చేస్తున్న గృహజ్యోతి, వ్యవసాయ ఉచిత విద్యుత్, చేతివృత్తుల వారికి ఈ (24-25) వార్షిక బడ్జెట్లో కేటాయించిన సబ్సిడీ నిధుల వివరాలు</p> <p>3</p>	<p>1. క్రమం తప్పకుండా గడువులోగా విద్యుత్ పంపిణీ సంస్థలు సమగ్ర ఆదాయ ఆవశ్యకత సమాచారం (ఏఆర్ ఆర్) కమిషన్కు సమర్పించటంలో జాప్యానికి గల కారణాలు టారిఫ్ ఫీలింగ్ లో వివరముగా తెలియ చేయుటమైనది</p> <p>2. గౌరవనీయమైన కమిషన్ వారిచే నిర్ధారించిన సబ్సిడీని గవర్నమెంట్ కు తెలియచేయబడుతుంది ఆ పై గవర్నమెంట్ ఆమోదించిన సబ్సిడీ ని తెలియచేయబడుతుంది.</p>

	<p>గత ప్రభుత్వం విద్యుత్ పంపిణీ సంస్థలకు సబ్సిడీల రూపం లో చెల్లించాల్సిన బకాయిల మొత్తం వివరాలు</p> <p>4 ఆర్థిక సామర్థ్యం నుండి విద్యుత్ బకాయిలు చెల్లించని వ్యక్తులు, సంస్థ నుండి బకాయిల వసూలుకు తీసుకుంటున్న చర్యల వివరాలు</p>	<p>3. గత ప్రభుత్వం విద్యుత్ పంపిణీ సంస్థలకు సబ్సిడీల రూపం లో చెల్లించాల్సిన బకాయిలు రూ. 803.45 కోట్లు.</p> <p>4. ఆర్థిక సామర్థ్యం ఉండి విద్యుత్ బకాయిలు చెల్లించని వ్యక్తులు, సంస్థల యొక్క బకాయిలపై విద్యుత్ సర్కార్ల ని విధించుట జరుగుతున్నది, అలాగే నిర్దేశించిన తేదీ లోపల బిల్లు కట్టనివారి యొక్క విద్యుత్ సరఫరా నిలిపివేయ బడుతుంది మరియు మొండి బకాయిలు వున్న వినియోగదారుని పై రెవెన్యూ రికవరీ యాక్ట్ అమలు చేస్తున్నాము</p>
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15. C.V Bhaskar Rao and 14 Others

15	<u>C.V Bhaskar Rao H.No</u> 8/302, kalyani Block, sahara states, Lb Nagar, Mansoorabad, Hyderabad, 500068
16	<u>Sri. GondlaChandraiah</u> , H.No.5-15, Nandi Vaddeman village, Bijinepally mandal, NGKL district 509215
17	<u>Sri. D. Ramu</u> , H.No.2-1-174 & 175, Rajput Residency, Old Ramalayam Road, Nallakunta, Hyderabad 500 044
18	<u>Sri. J Sriranga Rao</u> , H.No.2-2-18/18/7, Flat No.503, Srilaxmi Solitude, DD Colony, Hyderabad 500 013
19	<u>Amber Anand Rao</u> , H.No.3-117, Bhrahmana Palli, thadai, Kama Reddy, 503111.
20	<u>Sri. A Veerabhadra Rao</u> , H.No.12-13-486/39/1, Street No.14, Lane No.6, Beside Balaji Apartment, Tarnaka, Secunderabad, Hyderabad 500 017
21	<u>Sri.G Vinod Kumar Rao</u> , H.No.16-13-U.361, Plot No.361, Vasantha Nagar, Kukatpally, Hyderabad 500 085
22	<u>Sri. Madhuganti Sridhar Reddy</u> , Plot No.504, H.No.2-1-174, 175, Rajputra Residency, Nallakunta,Hyd-44
23	<u>Sri. MadireddyRajireddy</u> H.No.20-160/1/1/1,R B Nagar,NearPochammaTemple,Shamshabad, RR District 501218
24	<u>Sri. K. Jasyantha Reddy</u> , H.No.11-1-78/2, Bharat Nagar, Siddipet District
25	<u>Panyala Venkata Reddy</u> H.No.1-10-11, Sri Chakripuram, Kushaiguda 500062.
26	<u>G Gajender Goud, S/o: Bheemaiah</u> 3-6, Nagerkunta Vill, Shabad Mdl, RR District
27	<u>Satha Rao Ashok Reddy</u> , 1-80, Peddamuddunoor Nagarkurnool Village, 509412
28	<u>Sri. P. Narasimha Reddy</u> , Nandikandi village, Sadasivpet Mandal, Sangareddy District 502306
29	<u>Sri. Sangishetty Swamy</u> ,H.No.4-135, Nandi Vaddemanvillage,Bijinepally mandal, NGKL district 509215

5వ నియంత్రణ కాలము యొక్క ఆర్థిక సంవత్సరాలకు (2024-25 నుండి 2028-29వరకు) రిటైల్ సప్లయి వ్యాపారము కోసము సమగ్ర ఆదాయ ఆవశ్యకత మరియు 2024-25 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి, ధరల ప్రతిపాదనలు & క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనలపై సివిభాస్కర్రావు మరియు మరో 14 మందిగారి సూచనలు/సలహాలకు సమాధానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	టీజీఎస్పీడిసిఎల్ - సమాధానాలు
1.	తెలంగాణ రాష్ట్ర విద్యుత్ నియంత్రణ మండలి భవనాన్ని నిర్మించి మీ సేవలు విస్తృతం చేయడానికి మీరు స్వంత భవనం లో స్థిరమైనందుకు మిమ్మల్ని అభినందిస్తున్నాము.	—
2.	ఈ భవనము కోసం స్థలం ఇచ్చిన జెనోను, సహకరించిన GHMC, బలంగా సుందరంగా నిర్మించిన కాంట్రాక్టర్లు కు కృతజ్ఞతలు.	—
3.	ERC లో నూతనం గా నియమించబడ్డ సిబ్బందికి శుభాభినందనలు తెలుపుతూ సత్వరమే సేవలు అందించుటకు ప్రక్షితులుగా కావాలని కోరుతున్నాము.	—
4.	జన్ ఉద్యోగుల జీతభత్యాలను పెంచాలి. సీనియర్ ఉద్యోగులకు ఉన్న జీతభత్యాలపై చరమ (సీలింగ్) అవధి ఉండాలి.	వేతన సవరణ చర్చల కమిటీ'2022 నివేదిక ప్రకారం మరియు తెలంగాణ పవర్ యుటిలిటీల యాజమాన్యాలు, తెలంగాణ పవర్ యుటిలిటీలలో ప్రాతినిధ్యం వహిస్తున్న యూనియన్ల మధ్య కుదిరిన సెటిల్మెంట్ మెమోరాండం ప్రకారం హైదరాబాద్, కార్మిక జాయింట్ కమిషనర్ (జంట నగరాలు) పారిశ్రామిక వివాదాల చట్టం, 1947 మరియు తెలంగాణ రాష్ట్ర పారిశ్రామిక వివాదాల నియమాలు, 1958 యొక్క నిబంధనల ప్రకారం ఉద్యోగులు మరియు చేతివృత్తుల వారి జీతాలు మరియు అలవెన్సులు పెంచబడ్డాయి

<p>5.</p>	<p>రైతులు నూతన (ట్రాన్స్ఫార్మర్లు) కనెక్షన్ కోసం డిడిలు తీసినప్పుడు ORC రూపంలో వేలు లక్షలు కట్టవలసిందిగా నోటీసులు పంపుతున్నారు. దానివల్ల రైతులకు వ్యవసాయ రంగంలో తొలి అప్పు విద్యుత్ కోసమే అవుతుంది. సామాగ్రి కూలీల వ్యయం పెరిగినందువల్ల రైతులు చెల్లించే డిడి కి రెట్టింపు చేసి కనీసము మూడు LTపోల్ల దూరానికి అదనపు ఛార్జీలు లేకుండా కనెక్షన్ ఇవ్వాలి.</p>	<p>డిపార్ట్మెంట్ నిబంధనల ప్రకారం ఈ క్రింది విధంగా అంచనా వ్యయం మించి ఉంటే వినియోగదారుడు ORC రూపంలో ఛార్జీలను చెల్లించాలి:</p> <p>i) అంచనా లో HT లైన్, LT లైన్ & DTR ఉంటే, వ్యయం ప్రతి సర్వీస్ కు రూ.90,000/- వరకు టీజీఎస్పీడిసిఎల్ భరిస్తుంది.</p> <p>ii) అంచనా లో LT లైన్ మాత్రమే ఉంటే, వ్యయం ప్రతి సర్వీస్ కు రూ.45,000/- వరకు టీజీఎస్పీడిసిఎల్ భరిస్తుంది.</p> <p>పై సూచనలు అన్ని SE/OP లకు సూచనల రూపం లో జారీ చేయబడ్డాయి.</p>
<p>6.</p>	<p>DTR దిమ్మెలు రైతులే నిర్మించుకుంటున్నారు దానిని ఎస్టిమేషన్లో నుండి తీసివేయాలి. దిమ్మె కోసం కేటాయించిన డబ్బులు అవసరమైనచో ఇతర సామగ్రి కోసం ఉపయోగించాలి.</p>	<p>DTR దిమ్మెలు డిపార్ట్మెంటు ద్వారా నిర్మించడం జరుగుచున్నది.</p>
<p>7.</p>	<p>స్పార్మర్ నుండి రైతు కనెక్షన్ వరకు గల ప్రక్రియలో మేము ఏమి చేయాలి? డిస్కం ఏం చేస్తుంది?.</p>	<p>వ్యవసాయ సర్వీస్ లను విడుదల చేసే విధానం:</p> <p>i. వినియోగదారుడు మీ-సేవ/టీజీఎస్పీడిసిఎల్ పోర్టల్ లో వారికి అవసరమైన లోడ్ కు అవసరమైన ఛార్జీలను చెల్లించి దరఖాస్తులను నమోదు చేసుకోవాలి.</p> <p>ii. మీ-సేవ/టీజీఎస్పీడిసిఎల్ పోర్టల్ లో దరఖాస్తును నమోదు చేసిన తర్వాత, దరఖాస్తుతోపాటు పత్రాలు సంబంధిత అసిస్టెంట్ డివిజనల్ ఇంజనీర్ గాగిన్ కి పరిశీలన మరియు సర్వీస్ కనెక్షన్ కోసం పంపబడతాయి.</p> <p>iii. అసిస్టెంట్ డివిజనల్ ఇంజనీర్/ఆపరేషన్ అదే దరఖాస్తును సంబంధిత సెక్షన్ ఆఫీస్ లాగిన్ లకు పత్రాలతో పాటు పంపిస్తారు.</p>

		<p>iv. సెక్షన్ ఆఫీసర్ సైట్ లొకేషన్తో పాటు ఆధార్ కార్డ్, పట్టా పాస్ బుక్, సి-ఫారమ్ మొదలైన అన్ని పత్రాలను ధృవీకరిస్తారు.</p> <p>v. వినియోగదారుకు ఎటువంటి మౌలిక సదుపాయాలు అవసరం లేకుంటే, సక్రమంగా సర్వీస్ నంబర్ను కేటాయించి కనెక్షన్ ఇవ్వబడుతుంది మరియు EBSలో అప్లోడ్ చేయడానికి నెలవారీ సర్వీస్ కనెక్షన్ రిలీజ్ రిటర్న్ లో EROకి పంపబడుతుంది.</p> <p>vi. వినియోగదారునికి మౌలిక సదుపాయాలు (LT లైన్, 11KV లైన్ & DTR మొదలైనవి) అవసరమైతే, ఈ అప్లికేషన్ ఫస్ట్ ఇన్ ఫస్ట్ అవుట్లో అంచనాను రూపొందించడానికి SAPకి పోస్ట్ చేయబడుతుంది (అంటే, సెక్షన్ స్టాయిలో సీనియారిటీ జాబితాలో జోడించబడుతుంది).</p> <p>vii. సీనియారిటీ జాబితా ప్రకారం అంచనా డబ్ల్యుబిఎస్ నంబర్ సృష్టించబడుతుంది మరియు కాంపిటెంట్ అథారిటీల ద్వారా మంజూరు కోసం పంపబడుతుంది.</p> <p>viii. అధికార ప్రతినిధి బృందం ప్రకారం అంచనా మంజూరు చేయబడుతుంది మరియు అంచనా వ్యయం మించి ఉంటే ORC చెల్లింపు కోసం డిమాండ్ నోటీసు వినియోగదారునికి జారీ చేయబడుతుంది.</p> <ul style="list-style-type: none"> ➤ అంచనా లో HT లైన్, LT లైన్ & DTR ఉంటే, వ్యయం ప్రతి సర్వీస్ కు రూ.90,000/- టీజీఎస్పీడిసిఎల్ భరిస్తుంది. ➤ అంచనా లో LT లైన్ మాత్రమే ఉంటే, వ్యయం ప్రతి సర్వీస్ కు రూ.45,000/- టీజీఎస్పీడిసిఎల్ భరిస్తుంది. <p>ix. అంచనాను మంజూరు చేసిన తర్వాత, పద్ధతి ప్రకారం</p>
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		<p>కాంట్రాక్టర్ ఒప్పందాన్ని తీసుకోవటంజరుగుతుంది.</p> <p>x. డివిజన్ కార్యాలయం నుండి ఒప్పందాన్ని అందించిన తర్వాత AE/ఆపరేషన్ ద్వారా వర్క్ ఆర్డర్ తీసుకోబడుతుంది.</p> <p>xi. వర్క్ ఆర్డర్ను విడుదల చేసిన తర్వాత, స్టోర్ల నుండి మెటీరియల్ డ్రా చేయబడుతుంది మరియు పని అమలు చేయబడుతుంది.</p> <p>xii. వినియోగదారుడువ్యవసాయమోటార్సామర్థ్యానికిసరిపడుకే పాసిటర్నుఅమర్చుకోవాలి.</p> <p>xiii. తర్వాత సర్వీస్ కనెక్షన్కునంబర్ను కేటాయించి, EBSలో అప్లోడ్ చేయడానికి నెలవారీ సర్వీస్ కనెక్షన్ రిలీజ్ రిటర్న్ లో EROకి పంపబడుతుంది.</p>
<p>8.</p>	<p>Toll Free నెంబర్లు 1800 425 3600, 1800 425 0028 లను పునరుద్ధరించాలి. Toll Free నెంబర్లు క్రియాత్మకం (active) చేస్తూ ప్రచారం చేయాలి. ప్రతి ట్రాన్స్ఫార్మర్ గడ్డె పై ప్రధాన కూడల్లో ప్రజలు రద్దీగా ఉండే చోట్లలో టోల్ ఫ్రీ నెంబర్లు రాయాలి. టోల్ ఫ్రీ నెంబర్ కు ఫోన్ చేస్తే మీ AE గారికి చెప్పారా అని అడుగుతున్నారు.కాబట్టి ఇలా ఆడగకుండా బాధ్యతను వారికి అర్థం చేయించండి. విద్యుత్తుకు సంబంధించిన ప్రతి కంప్లైంట్ టోల్ ఫ్రీ ద్వారానే జరిగే విధంగా చర్యలు చేపట్టి పని పూర్తి అయ్యేవరకు పర్యవేక్షణ చేస్తూ సంబంధిత అధికారులను సమాయత్తం చేయాలి.</p>	<ol style="list-style-type: none"> 1. టోల్ ఫ్రీ నంబర్స్ 1800 425 0028 & 1912 వాడకంలో ఉన్నాయి. 2. అన్ని విద్యుత్ కార్యాలయాల్లో, సబ్ స్టేషన్ లలో, గ్రామ పంచాయతీ కార్యాలయాల వద్ద మరియు ట్రాన్స్ఫార్మర్ల గడ్డెలపై టోల్ ఫ్రీ నంబర్లు వ్రాయబడ్డాయి. 3. వినియోగదారుడు టోల్ ఫ్రీ నెంబర్ కు ఫోన్ చేస్తే కాల్ సెంటర్ ఏజెంట్స్ తన ఫిర్యాదునమోదు చేసుకొని ఆ సమాచారాన్ని సంబంధిత అధికారికి తెలియచేస్తారు. 4. విద్యుత్తుకు సంబంధించిన ప్రతి ఫిర్యాదు టోల్ ఫ్రీ నెంబర్ ద్వారా నమోదు చేసుకొని అది పూర్తి అయ్యే వరకు సంబంధిత అధికారులతో విచారణ చేయడం జరుగుతుంది. 5. వినియోగదారుల ఫిర్యాదులను ఇబ్బంది లేకుండా పరిష్కరించేందుకు, టీజీఎస్సీడిసిఎల్అదనంగా 15 మంది సిబ్బందిని CCC (కమాండ్ కంట్రోల్ సెంటర్) సెంటర్లో పని చేయడానికి కేటాయించింది. 6. CCC సిబ్బంది, క్షేత్రస్థాయి సిబ్బంది సమన్వయంతో వినియోగదారుల ఫిర్యాదులను సమర్థవంతంగా పరిష్కరించటం

		జరుగుతుంది.
9.	బైల్ అప్లికేషన్ App ద్వారా ఏ విధంగా సమస్యలను పరిష్కరించుకోవచ్చో విరివిగా ప్రచారం చేయాలి. TGSPDCL లో కూడా Mobile App ను ప్రవేశపెట్టాలి.	వినియోగదారుల ఫిర్యాదులను నమోదు చేయడానికి టీజీఎస్పీడిసిఎల్మొబైల్ యాప్ను అభివృద్ధి చేసింది. ఈ యాప్ను గూగుల్ ప్లే స్టోర్ నుండి డౌన్లోడ్ చేసుకోవచ్చు.
10.	స్వార్కర్లు, స్తంభాలు మరియు ఇతర సామాగ్రి రైతుల ద్వారా ట్రాక్టర్లలో తరలింప చేస్తున్నారు. ఈ పని చేస్తూ ఎందరో ప్రాణాలు పోగొట్టుకుంటున్నారు. కాంట్రాక్టర్ల ద్వారా విద్యుత్ సిబ్బంది ద్వారా జరగవలసిన పనులను రైతులతో చేయించి, రైతుల మరణానికి కారకులైన వారు హంతకులే రైతుల యొక్క అవసరాలు, అమాయకత్వాన్ని వాడుకొని ప్రమాదాలకు గురిచేసి హత్య చేస్తున్నారు. ఫీజులు పోయినప్పుడు సకాలంలో సిబ్బంది స్పందించ నందువల్ల పంట నష్టం జరుగుతుందనే ఆవేదనతో ఫీజుల మరమ్మత్తు చేస్తూ ప్రాణాలు పోగొట్టుకుంటున్న వారివి కూడా హత్యలే. వీటిని రైతుల యొక్క తొందరపాటు మరణాలుగా భావించటం కడు సోచనీయం. దానిని నివారించాలి పోల్ల రవాణా చేయించే అధికారులపై కాంట్రాక్టర్ల పై క్రిమినల్ కేసులు పెట్టాలి. ఆపరేషన్ సిబ్బందికి బిల్ కలెక్షన్ బాధ్యతలు అప్పగించి పని భారం పెంచరాదు.	టీజీఎస్పీడిసిఎల్సిబ్బంది మాత్రమే లైన్లు మరియు డీటీఆర్ల మరమ్మత్తుల కోసం పనిని చేపడతారు కాని రైతులు చేయకూడదు అనే ఈ సందేశం అన్ని రకాల సమాచార మాధ్యమాల ద్వారా విస్తృతంగా ప్రచారం చేయబడుచున్నది. పోల్స్, డీటీఆర్లను డిపార్ట్మెంట్ మాత్రమే రవాణా చేస్తోంది. ఓఓఎం సిబ్బందికి నిర్దేశిత నిబంధనల ప్రకారం మాత్రమే పనులు అప్పగిస్తున్నారు.
11.	ల ట్రాన్స్వార్కర్లు కాలిపోయినప్పుడు విద్యుత్ శాఖ వారే తమ వాహనాలలో తెచ్చి బిగించాలి. ఎట్టి పరిస్థితులలో కూడా రైతులను ముట్టుకోనియ్య రాదు. 60 శాతం DTRలు రవాణా చేసామని ARR (NPDCL ARR Page No 93) లో తెలిపారు.ఇవి అన్నీ పట్టణ - నగర ప్రాంతాలవే, గ్రామీణDTRలు రవాణా చేయటం లేదు.	విషయం NPDCLకి సంబంధించినది కావున కామెంట్స్ లేవు
12.	జు లైన్లను సరి చేస్తూ కాలం చెల్లిన పాత సామగ్రిని తొలగించి కొత్తవి బిగించాలి.	ఇది నిరంతర ప్రక్రియ మరియు డిపార్ట్మెంట్ ఈ పనిని క్రమం తప్పకుండా నిర్వహిస్తుంది. ఇటీవల 33,739 లొకేషన్లలో లూజ్ లైన్లు సరిచేయబడినవి మరియు గుర్తించబడిన ప్రమదహిత పరికరాలు

		రీప్లేస్మెంట్ చేయబడ్డాయి.
13.	యోగదారునికికేటగిరి ల విషయంలో అవగాహన కల్పించాలి. అవగాహన కలిపించకుండానే కేసులు పెడుతున్నారు. ఉదా: CHAP CUTTAR లు, గో సంపదకు నీరు తాగించటము.	గౌరవనీయులైన TGERC ఆదేశాల మేరకు మాత్రమే టారిఫ్ వర్గీకరణ జరుగుతోంది.పక్కాగా అమలు చేయాలని క్షేత్రస్థాయి సిబ్బందికి ఆదేశాలు జారీ చేయటం జరిగినది. DPE సిబ్బంది తనిఖీ సమయంలో, సరఫరా యొక్క అనధికారిక వినియోగం గుర్తించబడితే, సర్వీస్ యొక్క వాస్తవ కేటగిరి కి సంబంధించి వినియోగదారులకు సరైన అవగాహన కలిపించటం జరుగుచున్నది. ఇంకా, గృహ జ్యోతి స్కేమ్లో ప్రయోజనాలను పొందడం కోసం, కొత్త మీటర్ సర్వీస్ కనెక్షన్లను తీసుకోవడం కోసం, వినియోగదారులకు అవగాహన కల్పించడం కోసం DPE వింగ్ ద్వారా అవగాహన కార్యక్రమాలు నిర్వహించబడుచున్నవి.
14.	త్యంత ఎక్కువ ఉన్న టారిఫ్ అడ్వర్టైజ్మెంట్ హోర్డింగ్స్ (Shops) వ్యాపార స్థలాలు దుకాణాల టారిఫ్ లు వేరు. వినియోగదారుల నుంచి అత్యధిక ధరలు వసూలు చేసే విమానాశ్రయాలు వారికి అత్యధిక టారిఫ్ గల హోల్డింగు లుప్రదర్శించే వారు అనుమతి లేకుండా ఇతర కేటగిరీలలో వాడుకుంటున్నారు ఇలాంటి వారిని విడిచిపెట్టి చాప్ కట్టర్ (గడ్డిని ముక్కలు చేసే యంత్రం) ఉపయోగించే రైతులపై కేసులు బుక్ చేయడం విచారకరం. Airport కేటగిరీని వేరు చేయాలి. Airport లోని హోటల్స్ షాప్స్ హోల్డింగ్స్ కేటగిరీని వేరు చేయాలి. బస్టాండ్ రైల్వే స్టేషన్ల సేవలు వేరు చేయాలి. Airport సేవలు వేరు చేయాలి.	DPE సిబ్బంది తనిఖీ సమయంలో, సరఫరా యొక్క అనధికారిక వినియోగం గుర్తించబడితే, సర్వీస్ యొక్క వాస్తవ కేటగిరి కి సంబంధించి వినియోగదారులకు సరైన అవగాహన కలిపించటం జరుగుచున్నది మరియు అనుమతులు లేకుండా ఇతర కేటగిరీలలోవాడే వినియోగదారులు ఎవరైనా వారి పై కేసులు (Malpractice) బుక్చేయడం జరుగుచున్నది. ఆర్థిక సంవత్సరం 2024 - 25 సమగ్ర ఆదాయ ఆవశ్యకత మరియు ధరల ప్రతిపాదన లో HT-III కేటగిరి ధరలను , HT-II కేటగిరి ధరలతో సమానంగా ప్రతిపాదించడం జరిగినది.
15.	టారిఫ్ లవారీగా కేటగిరీలు అన్ని డిస్కం ఆఫీసులలో ప్రదర్శన చేయాలి. ప్రచారం కూడా చేయాలి.	టారిఫ్ ఆర్డర్లు టీజీఎస్పీడిసిఎల్వెబ్సైట్లో ఉంచబడినవి మరియు విద్యుత్ బిల్లు వెనుక భాగంలో టారిఫ్ ల వారిగా కేటగిరీలుతెలియచేయటం జరుగుచున్నది.
16.	క్షన్ రిలీజ్ చేసిన తరువాత లిఖితపూర్వకంగాలేఖనంవ్వాలి. అంచనా (ఎస్టిమేట్) కాపీలో ఉన్న సామాగ్రి, మరియు డ్రా	అంచనా వ్యయం మంజూరు అయిన తరువాత అందులో పొందు

	చేసిన సామాగ్రి, వాడిన సామాగ్రి వేరువేరు గా ఉంటున్నాయి. వినియోగదారుడికి వాడిన సామాగ్రి యొక్క వివరాలతో పాటు release లెటర్ ఇవ్వాలి.	పరచిన సామాగ్రి అనగా అవసరమైన స్తంభాలు, DTR వివరాలు వినియోగదారులకి SMS రూపం లో వస్తుంది. స్టోర్ నుండి సామాగ్రి తీసుకున్నాక వాటికి సంబంధించిన వివరాలు SMS ద్వారా తెలియ చేయటం జరుగుచున్నది. TG-IPASS & Non TG-IPASS ధరఖాస్తుల రిలీజ్ సర్టిఫికేట్స్ వెబ్ సైట్ లో పొందుపరచటం జరుగుతుంది, వినియోగదారులు వెబ్ సైట్ నుండి వాటిని సేకరించవచ్చు.
17.	CGRF వారి పర్యటనలు పెంచాలి, ముందస్తు ప్రచారం జరగాలి.	i) CGRF ఫోరమ్ తెలంగాణ స్టేట్ ఎలక్ట్రిసిటీ రెగ్యులేటరీ కమిషన్ యొక్క 2015 రెగ్యులేషన్ నంబర్ 03లోని క్లాజ్ 2.3లో పేర్కొన్న విధంగా స్థానిక కోర్టులను నిర్వహిస్తోంది. ii) ప్రచారానికి సంబంధించి, స్థానిక కోర్టులను నిర్వహించే సెక్షన్ లను ముందుగానే గుర్తించి, దిన పత్రికలలో ముందస్తుగా తేదీలను ప్రకటించటం జరుగుచున్నది.
18.	CGRF ఆర్డర్ల అమలు కొరకు డిస్కాంలు ప్రత్యేక వ్యవస్థ ను ఏర్పాటు చేసి, పని పూర్తి అయిన తరువాత వినియోగ దారుడితో తప్పక దృవీకరించు కోవాలి.	CGRF ఆదేశాలను ఎప్పటికప్పుడు DISCOM లోని వ్యవస్థ పరిశీలిస్తున్నది.
19.	సుల్తోనే పనిచేస్తూ పర్యవేక్షణ కొరకు బయటకు వెళ్ళని వారి కార్ల సౌకర్యాన్ని రద్దు చేసి సామూహిక బస్సు సౌకర్యం కల్పించాలి.	అధికారులకు బస్సు సౌకర్యం కల్పించడం సాధ్యం కాదు. డిపార్టుమెంటు పరంగా కార్లను వినియోగించే అధికారులకు రవాణా భత్యం మరియు ప్రయాణ భత్యాలు చెల్లించడం లేదు..
20.	స్టేషన్ నుండి ప్రతి రైతు కనెక్షన్ వరకు న్యూట్రల్ వైరు లాగాలి	దశలవారీగా పనులు చేపట్టనున్నారు
21.	ల యొక్క సర్వే నెంబర్లు, సర్వే నెంబర్లను అనుకొని ఉన్న సహజ నీటి వనరులైన ఒరెలు, వాగులు, కాలువలలో మోటారు పెట్టుకునేందుకు రైతులు డిడి చెల్లిస్తే అట్టి	AGL దరఖాస్తుదారు నీటిపారుదల అధికారుల నుండి అభ్యంతరం లేని సర్టిఫికేట్ (NOC) పొందిన తర్వాత మరియు జిల్లా కలెక్టర్

	<p>కనెక్షన్ ఇచ్చిన అధికారులకు నోటీసులు పంపిస్తున్నారు క్రిందికి వృధాగా పోతున్న నీటిని రైతులు వాడుకుంటున్నప్పుడు, అధిక వర్షాలు కురిసినప్పుడు సహజ నీటి ప్రవాహం ఎక్కువైతే నష్టపోయేది రైతే. నీరు అధికమైనప్పుడు భూమి కోతకు గురి అవుతుంది. నీటి అవసరమున్నప్పుడు ఆ నీటిని వాడుకుంటాడు. అది రైతు హక్కు. ఇట్టి వసతి కొరకై విద్యుత్ కనెక్షన్ ఇవ్వాలి.</p>	<p>సమ్మతితో చెరువులు, వరద కాలువల ద్వారా ఒక ప్రదేశం నుండి మరొక ప్రదేశానికి నీటిని పంపింగ్ చేసిన తర్వాత విద్యుత్ కనెక్షన్ కోసం దరఖాస్తు చేసుకోవచ్చు.</p>
22.	<p>మీ సాగర్ ప్రాజెక్టు వరద కాలువ పై నూతన కనెక్షన్లు ఇవ్వడం లేదు. రైతులకు జీవనాధారమైన అత్యంత విలువైన భూమిని వరద కాలువ కోసమే ఇచ్చిన రైతులకు ఆ నీటిని వాడుకోవటానికి అడ్డుపడటం విచారకరం. గత ప్రభుత్వం రైతులు మోటార్ల ద్వారా నీరందించుకున్న ఎకరాలను తామే సాగులోకి తీసుకు వచ్చిన విధంగా ప్రకటించుకుంది. రైతులు పంట రక్షణ కొరకు ఎక్కడి నుంచి అయినా నీటిని తరలించవచ్చని చట్టంలో ఉంది. అందుకని అడిగిన వెంటనే నీటివనరుల వద్ద కూడా కనెక్షన్ ఇవ్వాలి</p>	<p>విషయం NPDCLకి సంబంధించినది కావున కామెంట్స్ లేవు</p>
23.	<p>పార్టెంట్ వారి నిర్లక్ష్యం కారణంగా మరణానికి గురి అవుతున్న "రైతు హత్యలను" ఆపాలి. విద్యుత్ షాక్ కు గురి అయిన చనిపోయిన వారికి ఇచ్చే ఆర్థిక సహాయాన్ని రెట్టింపు చేయాలి. మరణించిన పశువులకు ఇచ్చే ఆర్థిక సాయాన్ని లక్ష రూపాయలుగా చేయాలి. గొర్రెలు మేకలకు Rs 12000/- చేయాలి.</p>	<p>ఎక్స్ గ్రేషియా చెల్లింపునకు గౌరవప్రదమైన TGERC ఆదేశాలను DISCOM అనుసరిస్తుంది.</p>
24.	<p>విద్యుత్ షాక్ కు గురి అయి ఆసుపత్రిలో చేరి ప్రాణం దక్కిన వారి ఆస్పత్రి ఖర్చులను డిపార్ట్మెంట్ వారు భరించాలి. వికలాంగులుగా మారితే అతనికి జీవన భృతినీ ఇవ్వాలి.</p>	<p>డ్యూటీలో ఉన్నప్పుడు ఎలక్ట్రికల్ నాన్-ఫాటల్ యాక్సిడెంట్కు గురైన ఉద్యోగులు/ఆర్థిస్టన్ లకు టీజీఎస్పీడిసిఎల్ ద్వారా గుర్తింపు పొందిన ఆసుపత్రిల్లో ఇన్ పేషెంట్ గా ఉన్నప్పుడు మెడికల్ క్రెడిట్ కార్డ్ సౌకర్యాన్ని టీజీఎస్పీడిసిఎల్ అందిస్తోంది. ఎలక్ట్రికల్ నాన్-ఫాటల్ యాక్సిడెంట్కు గురైన Un-manned కార్మికులకు బోర్డు ఆమోదం ప్రకారం మెడికల్ క్రెడిట్ కార్డ్ సౌకర్యం కూడా అందించబడుతుంది.</p>

25.	ఆర్ఎఫ్ ఫోర్డ్ మెంబర్ కు రోజువారీ సిట్టింగ్ Fee ప్రస్తుతం ఉన్న దానిని రెట్టింపు చేయాలి.	స్వతంత్ర సభ్యుని యొక్క సిట్టింగ్ రుసుము లేదా ఇతర అలవెన్సులతో కూడిన వేతనం గౌరవనీయమైన TGERC ద్వారా ఎప్పటికప్పుడు నిర్ణయించబడుతుంది మరియు లైసెన్సుదారుచే భరించబడుతుంది.
26.	నూణ ఖర్చులు బస్సు రైలు ఛార్జీలు మరియు వాస్తవ ప్రయాణ సమయం లో అయ్యే భోజన నివాస ఖర్చులు చెల్లించాలి. దీనికాను ఒక కిలో మీటర్ కు ఇంత మొత్తం అని నిర్ణయించాలి.	G.O. Ms.No.60, Dt:02-05-2015, r/wలో జారీ చేసిన ఉత్తర్వుల ప్రకారం మరియు TOO Ms.No.155, Dt:17-08-2015, ప్రకారం ప్రయాణ మరియు రోజువారీ భత్యాలు మరియు బస్ ఓబోర్డింగ్ ఛార్జీలు ఇప్పటికే నిర్ణయించబడ్డాయి మరియు చెల్లించబడుతున్నాయి.
27.	సత్య రంగంలో విద్యుత్ సేవలు కొనసాగాలంటే కాలానుగుణంగా పెరిగిన ధరల వేతనాలు విద్యుత్ కొనుగోలు ఇతర ఖర్చులు పెరిగిన విధంగానే టారిఫ్ కూడా, చెల్లించ గలిగే స్తోమతను బట్టి పెంచాలి. సుదీర్ఘకాలం పెంచకుండా ఉంటే డిస్కంల మనుగడ కష్టం అయ్యి విద్యుత్తు సరఫరా ప్రైవేటు రంగానికి బదిలీ అయ్యే అవకాశం ఉంది.	ప్రభుత్వ రంగంలో విద్యుత్ సేవలు కొనసాగించడానికి, విద్యుత్ వినియోగదారుల ఆర్థిక స్తోమతను బట్టి టారిఫ్ ప్రతిపాదనలు నిర్ణయించి గౌరవనీయమైన కమీషన్ ముందు పొందు పరచటం జరిగినది.
28.	HD DOMESTIC వినియోగదారులను తప్పదోవ పట్టించి 33kv సబ్ స్టేషన్ పెట్టుకోవాలి వస్తున్నది.నగరాలలో భూమి కొరత కారణంగా 33 kv సబ్ స్టేషన్ పెట్టుకోలేరు. వాస్తవ వినియోగాన్ని మాత్రమే లెక్కించాలి. కనెక్టెడ్ వినియోగాన్ని లెక్కించరాదు. ఫైర్ ఎక్విప్మెంట్ ను లెక్కించరాదు.	—
29.	TSSPDCL, TSNPDCL CMD లు గా ఐఎఎస్ అధికారులు సేవలు అందించడానికి వచ్చి, వినియోగదారునికి సత్వర నిజాయితీ సేవలు అందించే ప్రయత్నం చేస్తున్నందుకు వారికి ధన్యవాదాలు.	—
30.	TSNPDCL వారు కాలిపోయిన DTR లు రవాణా ఎంత పర్సెంటేజి చేశాము అని, దుర్మరణాలకు కారణాలేంటి అని అన్ని వివరాలు వ్రాశారు వారికి ధన్యవాదాలు,TSSPDCL వారు కూడా వివరాలు ఇవ్వాలి,	2023-24 ఆర్థిక సంవత్సరంలో TGSPDCLలో విద్యుత్ ప్రమాదాలు సంభవించాయి, 288 ప్రాణాంతక ప్రమాదాలలో 276 ప్రమాదాలు

	కరెంటు స్తంభాలు పడి చనిపోయిన రైతుల లెక్క కూడా ఇవ్వాలి. సెస్ సిరిసిల్ల వారు ARR లో వారి లెక్కలు మినహా ఎటువంటి సేవల వివరాలు ఇవ్వలేదు. వారు కూడా అన్ని వివరాలు ఇవ్వాలి.	వినియోగదారుల తప్పిదాలు, సాధారణ ప్రజల అజాగ్రత్త వైఖరి కారణంగా సంభవించాయని గమనించాలి; టిజిఎస్పిడిసిఎల్ సిబ్బంది అత్యంత జాగ్రత్తలు తీసుకున్నప్పటికీ డిపార్ట్మెంటల్ సిబ్బంది వల్ల 12 ప్రమాదాలు జరగగా, టిజిఎస్పిడిసిఎల్లోని కాంట్రాక్ట్ లేబర్ వల్ల 5 ప్రమాదాలు జరిగాయి. అందువల్ల, టిజిఎస్పిడిసిఎల్ ద్వారా అనేక అవగాహన కార్యక్రమాలు మరియు ప్రకటనలు నిర్వహించిన తర్వాత కూడా, భద్రతా చర్యలను పాటించకుండా వినియోగదారుల అజాగ్రత్త కారణంగా చాలా ప్రమాదాలు సంభవించాయి.
31.	కేటగిరి వివరాలు అన్ని విద్యుత్తు ఆఫీసుల్లో ప్రదర్శించాలి.	టీజీఎస్పీడిసిఎల్వెబ్ సైట్ లో (www.tgsouthernpower.org) అన్ని కేటగిరి ల వివరాలు పొందు పరచబడ్డాయి, వినియోగదారులు వాటిని ఉచితంగా పరిశీలించవచ్చును.
32.	వ్యవసాయ విద్యుత్ సరఫరా కాస్టు ఎంత, టారిఫ్ ఎంత, ప్రస్తుతం ప్రభుత్వం చెల్లిస్తున్నది ఎంత తెలియచేయాలి.	2023-24 ఆర్థిక సంవత్సరానికి వ్యవసాయ విద్యుత్ సరఫరా కాస్టు 7.47 Rs./Kwh, పూర్తి ఖర్చు టారిఫ్ Rs. 0.62 Rs./Kwh, ప్రభుత్వం రూ. 705 కోట్లు చెల్లించడం జరిగినది.
33.	పెండ్లింగ్లో ఉన్న బకాయిల చెల్లింపు కోసం నీటిపారుదల శాఖతో చెల్లించాల్సిన బిల్లులు వెంట వెంటనే వసూలు చేయాలి.	పెండింగ్లో ఉన్న బకాయిల చెల్లింపు కోసం నీటిపారుదల శాఖతో క్రమం తప్పకుండా చర్యలు తీసుకోవడం జరుగుచున్నది.

34.	<p>హైదరాబాద్ సౌత్ సర్కిల్ కు సబ్స్టేషన్ చేసే విద్యుత్తు ఎంత, వసూలు చేసేది ఎంత వివరాలు ఇస్తూ, వీరి బిల్లులు సరిగా వసూలు చేసే విధంగా చూడాలి.</p>	<p>వినియోగం (KWH MU), FY 2023-24 కోసం హైదరాబాద్ సౌత్ సర్కిల్ కు సంబంధించి FY 2023-24 సేకరణ % ఈ క్రింది విధంగా ఉంది:</p> <table border="1" data-bbox="1115 277 1892 435"> <thead> <tr> <th>ప్రత్యేక</th> <th>యూనిట్లు</th> <th>FY 2023-24</th> </tr> </thead> <tbody> <tr> <td>వినియోగం</td> <td>MU</td> <td>1356.62</td> </tr> <tr> <td>సేకరణ</td> <td>Rs. in Crs</td> <td>924.83</td> </tr> </tbody> </table> <p>నిర్దేశించిన తేదీ లోపల బిల్లు కట్టనివారి యొక్క విద్యుత్ సరఫరా నిలిపివేయ బడుతుంది మరియు మొండి బకాయిలు వున్న వినియోగదారుని పై రెవెన్యూ రికవరీ యాక్ట్ అమలు చేస్తున్నాము</p>	ప్రత్యేక	యూనిట్లు	FY 2023-24	వినియోగం	MU	1356.62	సేకరణ	Rs. in Crs	924.83
ప్రత్యేక	యూనిట్లు	FY 2023-24									
వినియోగం	MU	1356.62									
సేకరణ	Rs. in Crs	924.83									

30. Response to ITC Limited

16	ITC Limited , Paper Boards and Speciality Papers Division, Divisional Headquarters: ITC Bhadrachalam house, 106, Sardar Patel Road, Secunderabad- 500003, Telangana, India	
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	ITC Limited ('ITC') is a company under the Companies Act 2013 with its registered office at Virginia House, 37 J.L. Nehru Road, Kolkata 700071 and its paper and paperboard manufacturing unit at Sarapaka Mllage, Bhadradi Kothagudem District, Telangana.	No Comments
2	<p>The captive generation of electricity at ITC's aforesaid unit is by co-generation process whereby heat energy used for pulp cooking, humidification and drying is produced along with electricity. The said plant presently has seven TG Sets of varying capacities aggregating to about 260.187 MVA. Four TG-Sets of 95.5 MVA is kept as a stand-by.</p> <p>The TG-sets and the loads are segregated into two networks internally, with 88 MVA in one network and 76.687 MVA in another network. Under normal operation, the TG sets are operated in island mode and the entire load is met exclusively from the TG sets, no power being consumed from TGNPDCL.</p> <p>The Consumer Service with TGNPDCL is presently with a CMD of 15 MVA at 132 kV. Power is drawn from TGNPDCL within the CMD of 15 MVA partly for start-up purposes of the TG-sets and partly as standby power. The starting currents of motors during start-up is minimized by soft start arrangements. The power drawn during start-ups is always well within the CMD of 15 MVA.</p> <p>The said plant also receives and consumes power from its wind energy plant in Andhra Pradesh through inter-state open access.</p>	<p>The licensee has computed Grid Support charges as per the methodology approved by Hon'ble Commission vide order O. P. Nos. 80 & 81 of 2022 dated 27.03.2024. The excerpt of the clause 4.1.13 is shown below</p> <p><i>“At this stage, when the Retail Supply Tariffs are already fixed for FY 2023-24 and the Financial Year is at the fag end, the commission is not willing to determine GSC for FY 2023-24 and directs TSDISCOMs to file a separate petition for determination of GSC for FY 2024-25 onwards duly following the methodology approved in this order”</i></p> <p>Hence, the licensee has adopted the methodology approved in the above order for computation of Grid Support Charges for FY 2024-25</p>

	<p>Under normal Operation, the connection with the grid is only to enable import of the energy Under Open access. At such times, only one of the networks is connected to the grid.</p> <p>There are electrical inter-locks in place to ensure that the connected loads trip whenever there is a tripping of the TG-Sets. Therefore, there is no transfer of load to the grid in the event of TG-Set failure or shut down. Mandatory protection arrangements are in place to clear internal faults within the time prescribed in the Grid</p> <p>In the normal operation of ITC's Continuous process plant, there are no equipment which impose intermittent or transient loads. There is no harmonic injection from ITC's plant in excess of permissible limits.</p> <p>Therefore, there is no circumstance by which it can be considered that any grid support is actually availed by ITC. The connection to the grid is utilized only for start-up power or stand-by within the CMD with TGNPDCL or for import of open access power</p>	
3	<p>TGNPDCL and TGSPDGL have proposed levy of grid support charges ('GSC') for the FY 2024-25 based and relying upon the Order dated 27.03.2024 of this Commission in ,Op. Nos. 80 & 81 of 2022. It may be noted that ITC has appealed against the said ,Order dated 27.03 .2024 so far as relating to OP No. 80 of 2022 before APTEL, in DFR No. 259 of 2024: and APTEL, vide its Order dated 03.09.2024 (Annexure-A) has granted leave to appeal also directing the respondents to file their replies within six weeks. No reply has yet been filed by the respondents. In the said Appeal before APTEL, ITC has challenged both the findings of levy and rate of the GSC in the Commission's Order dated 27.03 .2024 on, inter alia, the grounds that the objections of ITC to the ARR</p>	<p>The Hon'ble Commission has determined the GSC as per the technical committee report of the Grid Coordination Committee duly considering the objections of the members of the committee towards the end of the Financial Year 2023-24 and directed the Licensees to file the proposals afresh for FY 2024-25. Therefore, based on the directions</p>

	<p>proposals for FY 2022-23 and FY2023-24 were not even tabled before the Grid Co-ordination Committee; that the said Committee gave biased, irrational and erroneous findings in its reports; that this Commission also did not deal with the submissions of ITC; that there was no real study or data for this Commission to conclude on the levy of GSC on all industries with co-located captive power plants; that the manner of computing GSC is arbitrary and unreasonable besides unjustly enriching the Discoms.</p>	<p>of the Hon'ble Commission, the DISCOMs have proposed the Grid Support Charges.</p>
<p>4</p>	<p>As also contended in ITC's aforesaid Appeal, without prejudice to ITC contentions against the very levy of GSC, the R&M costs of the TG-Transco and the TG-Discoms are already fully recovered from the retail supply tariffs and the transmission/wheeling tariffs. The amounts sought to be recovered by way of GSC would be over and above their approved ARRs and would lead to unjust enrichment. ITC's aforesaid plant is connected at 132 kV. The distribution system of the distribution licensee has no role to play whatsoever. There is no justification as to why a consumer should pay a charge based on the R&M costs of both the distribution licensees. There is also no reason or rationale for a consumer within the area of operation of one distribution licensee paying charges which are based upon the R&M costs of another distribution licensee. Further, in the computation of GSC, if the "power consumed by the co-located load" purports to include also the power drawn from the grid, it would amount to an additional charge over and above the tariff charge paid to the licensees</p>	<p>Grid support charges are imposed on captive consumers. These consumers do not contribute to the repair and maintenance (R&M) costs incurred by distribution companies. Consequently, these costs are recovered along with grid support charges.</p> <p>Calculation of grid support charges are common across different voltage levels. It is commonly calculated for overall transmission and distribution network and shared across voltage levels</p> <p>Grid support charges are distinct from standard tariff charges. Tariff charges cover the consumption of electricity, while grid support charges cover the maintenance of grid stability and the ancillary services provided by the grid to captive users. There is no double recovery, as these charges are meant to cover different aspects of grid usage</p>

5	In view of pendency of the above Appeal of ITC before APTEL, it is submitted that the proposal for determination of GSC be kept in abeyance until the said Appeal is decided	Based on the directions of the Hon'ble APTEL in the appeal filed by ITC, the Commission is requested to determine the GSC as per the directions given the Hon'ble Supreme Court of India in its judgement in 2022.
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31. Response to Bharti Airtel Ltd.

17	Bharti Airtel Ltd. , Airtel Center, Plot No. 16, Udyog Vihar, Phase IV, Gurugram – 122015	
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	The present objections, suggestions and submissions are being filed on behalf of Bharti Airtel Limited in reply to the Public Notice issued by Telangana Electricity Regulatory Commission dated 20.09.2024	No comments
2	That this Hon'ble Commission has issued the Public Notice dated 20.09.2024 ('Public notice') inviting objections/submissions on the Aggregate Revenue Requirement (ARR) for the 5 th Control period i.e. FY 2024-25 to FY 2028-29 & Tariff proposals for Retail Supply Business for Financial Year 2024-25 proposed by TGSPDCL in O.P.No. 16 of 2024 & I.A.No. 15 of 2024 and TGNPDCL in O.P.No. 17 of 2024 & I.A.No. 16 of 2024 submitted to this Hon'ble Commission for consideration	No comments
3	It is submitted that our company Bharti Airtel Ltd. ("Airtel"/"Objector") is a global communications solutions provider with over 491 Mn customers in 17 countries across South Asia and Africa. Airtel is one of the largest players in the Indian Telecom Sector with diversified operations in Telecom Infrastructure, Equipment, Mobile Virtual Network Operators (MVNO), White Space Spectrum, 5G, Telephone Service Providers and Broadband. Airtel ranks amongst the top three mobile operators globally and its network covers over two billion people. Airtel is India's largest integrated communications solutions provider. Airtel's retail portfolio includes high-speed	No comments

	<p>4G/5G mobile broadband, Airtel Xstream Fiber that promises speeds up to 1 Gbps with convergence across linear and on-demand entertainment, streaming services spanning music and video, digital payments and financial services. For enterprise customers, Airtel offers a gamut of solutions that includes secure connectivity, cloud and data center services, cyber security, IoT, Ad Tech and CPaaS (Airtel IQ).</p>	
4	<p>It is submitted that the Government of India, vide its national telecom Policy, 2012 has prescribed as follows: NATIONAL TELECOM POLICY, 2012</p> <p>"III . OBJECTIVES</p> <p>23. Recognize telecom as Infrastructure Sector to realize true potential of ICT for development."</p>	No comments
5	<p>Therefore, it is clear that vide the abovementioned National telecom Policy, the Government of India has recognized and granted infrastructure status to the telecom service provider industry in the year 2012 to boost the development of telecom infrastructure in India. It is submitted that over the last seven years, the Indian Telecom Tower industry has grown significantly by 65%. The number of mobile towers increased from 400,000 in 2014 to 660,000 in 2021. Similarly, the number of Mobile Base Transceiver Stations have grown rapidly by 187% and increased from 800,000 in 2014 to 2.3 mn in 2021. Rural tele-density jumps from 44% in March 2014 to 58% in October 2022. The telecom sector continues to play a leading role in successful implementation of various Government programs like Digital India, Make in India,. and development of Smart Cities.</p>	No comments

	<p>These programs and initiatives present plethora of opportunities for the telecom sector especially for the telecom infrastructure providers as the telecommunication infrastructure is the bedrock for achieving the vision of Digital India. A copy of the National Telecom Policy, 2012 is filed herewith as Annexure No.1.</p>				
6	<p>It is submitted that pursuant to the above the Advisory Guidelines dated 01.08.2013 issued by the Government of India for various State Government not only reaffirms the recognition and grant of Infrastructure status to Telecom towers but also recommends to the State Governments to accord and extend all benefits available to the Infrastructure industry to the telecom service providers for their towers, including provision of electricity connections. A copy of the Advisory Guidelines of the Dept. of Telecommunication dated 01.08.2013 is filed herewith as Annexure No.2</p>	No comments			
7	<p>It is submitted that immediately thereafter, similar recognition was granted to the Telecom Service Providers by the Ministry of Finance, Government of India vide its Ministry of Finance (Department of Economic Affairs) (Infrastructure Section) Notification dated 07.10.2013, wherein it was prescribed that:</p> <p>Updated Harmonised master list of infrastructure sub-sectors</p> <table border="1" data-bbox="310 1154 1262 1308"> <tr> <td>4.</td> <td>Communication</td> <td> <ul style="list-style-type: none"> • Telecommunication (fixed network) • Telecommunication towers • Telecommunication and Telecom service </td> </tr> </table>	4.	Communication	<ul style="list-style-type: none"> • Telecommunication (fixed network) • Telecommunication towers • Telecommunication and Telecom service 	No comments
4.	Communication	<ul style="list-style-type: none"> • Telecommunication (fixed network) • Telecommunication towers • Telecommunication and Telecom service 			
8	<p>In view of the above, it would now be appurtenant to draw the attention of this Hon 'ble Commission to the various applicable policies and legislations at the Central as well as the ones</p>	No comments			

	prescribed by the State of Telangana, which unequivocally establishes that the Objector is considered, recognized, and held to be an "Industry"	
9	<p>9. It is submitted that the telecom services are Essential Services under Section 2(A)(i) of the Essential Services Maintenance Act, 1968.</p> <p>"2.</p> <p>(1) Definitions. In this Act, -</p> <p>(a) " essential service" means-</p> <p>(i) any postal, telegraph or telephone service;</p> <p>. (ii) any railway service or any other transport service for the carriage of passengers or goods by land, water or air with respect to which Parliament has power to make laws;</p> <p>. (iii) any service connected with the operation or maintenance of aerodromes, or with the operation, repair or maintenance of aircraft;</p> <p>(iv) any service connected with the loading, unloading, movement or storage of goods in any part; "</p>	No comments
10	<p>It is submitted that the telecom sector is a public utility service under sections 2(j) read with 2(n) of the Industrial Disputes Act, 1947.</p> <p>"2. Definitions.- In this Act , unless there is anything repugnant in the subject or context: --</p> <p>.....</p>	No comments

	<p>(j) 'industry' means any business, trade, undertaking, manufacture, or calling o,(employers and includes any calling, service, employment, handicraft or industrial occupation or avocation of workmen.</p> <p>.....</p> <p>(n) "public utility service" means :-:</p> <p>(i) any railway service 2*[or any transport service for the carriage of</p> <p>· passengers or goods by air]; .</p> <p>4*[(ia) any service in, or in connection with the working of, any major port or dock;] (ii) any section of an industrial establishment, on the working of which the safety of the establishment or the workmen employed therein depends;</p> <p>(iii) any postal, telegraph or telephone service;</p> <p>(iv) any industry which supplies power, light or water to the public,· "</p>	
11	<p>Apart from the above , there are numerous judgments of the various High Courts and other judicial bodies in the country that have rendered categorical and unequivocal findings that the telecom services fall within the category ofIT/ IT enabled Services. In this regard, reference may be made to the following judgments</p> <p>(I) Syed Asifuddin and Ors. Vs. The State of Andhra Pradesh and Anr., 2005 Cri LJ 4314, High Court of Andhra Pradesh</p> <p>"18. So as to match with the system of the cell phone provider, every cell phone contain s a circuit board, which is the brain of the</p>	No comments

	<p>phone. .It is a combination of several computer chips programmed to convert analog to digital and digital to analog conversion and translation of the outgoing audio signals and incoming signals. This is a micro-processor similar to the one generally used in the compact disk of a Desk Top computer . Without the circuit board, cell phone instrument cannot function. Therefore, it is not possible to accept the submission that a cell phone is not a computer. 'Sven by the very definition of the computer and computer network as defined in IT Act, a cell phone is a computer which is programmed to do among others the function of receiving digital audio signals, convert it into analog audio signal and also send analog audio signals in a digital form, externally by wireless technology."</p> <p>(II) Amir Zai Sangin, In re, 1997 SCC Online AAR-IT 5, Authority for Advance Ruling</p> <p>" 17. It is clear from the above that the cellular network is a medium for dissemination through the system of computers and is essentially a computer network. In the light of this information, there can be no doubt that the expression "information technology"; as elaborated in the notification of July 27, 1993 (See [1993/ 203 /TR (St.) 56), also covers the area of cellular networks. For the reasons discussed above, this Authority is of the opinion that the applicant fulfils the definition of the expression technician in section 10(5]B)and the answers to the questions raised by him 'should he in the affirmative... "</p>	
12	Furthermore, it is also a matter of record that the High Courts have, vide various judgments also recognized that the entities engaged in the business activities of IT/ IT enabled Services are	No comments

"Industrial" undertakings. In this regard, reference may be made to the following judgments:

(I) Commissioner of Income Tax Vs Shaw Wallace and Co. Ltd, (1993) 201 ITR 17, High Com1 of Calcutta

"25. We are, therefore, of the view that the computer division is an industrial undertaking which satisfies the conditions mentioned in section 32A(2)(b)(iii) of the Income-tax Act, 1961. For the reasons aforesaid, the question in this reference is answered in the affirmative and in favour of the assessee. There will be no order as to costs."

(II) Commissioner of Income Tax Vs Vinay Kumar Sigtia, (2003) 262 ITR686, High Court of Orissa.

"14. Before the Calcutta High Court in CIT v. Shaw Wallace and Co. Ltd., [1993] 201 ITR 17, the question that came up for consideration was whether the business carried on by the assessee in its computer division with the aid of computer system is an industrial undertaking which satisfies the conditions mentioned in section 32A(2)(b) (iii) of the Act. On consideration of a large number of cases, it held that the assessee was an industrial company engaged in the manufacture or processing of goods. "Data processing" means the converting of raw data to machine-readable form and its subsequent processing by a computer. "Computer " means one that computes; specifically a programmable electronic device that can store, retrieve and

	<p>process data.</p> <p>Therefore, there cannot be any doubt that raw data cannot be equated with the result derived. It is different in form and substance.</p> <p>15. The specific case of the opposite party is that it is a small scale industrial unit and on feeding of data into the data processing machine, balance-sheet, profit and loss account, computations, and other statements emerge . In other words, raw data on being fed into the data processing machines, balance-sheets, profit and loss account and other statements are manufactured with distinct name, character or use.</p> <p>16. In view of what has been stated above, we have no hesitation to hold that the Tribunal was justified in allowing investment allowance on the opposite party's data processing machines. The question in this reference is, therefore, answered in the affirmative and in favour of the assessee. "</p>	
13	<p>It is submitted that the Hon'ble Appellate Tribunal for Electricity ("Hon'ble APTEL") was seized of Appeal No. 337 of 2016 and the related matters, which were decided vide its judgment dated 12.02.2020. In this case, the Hon'ble APTEL adjudicated upon a batch of appeals challenging the Ld. Maharashtra Electricity Regulatory Commission's ("Ld. MERC") order dated 03.11.2016 in Petition No. 48 of 2016, wherein, the Ld. MERC had, inter alia, reclassified the industries using power for mobile/telecommunication towers, etc., who were being charged under Industrial category since 2004, into Commercial category, unless the same were specifically included in the IT/ITES Policy of the Government of Maharashtra for coverage under the Industrial category. It is submitted that among the issues dealt with by the</p>	No comments

Hon'ble APTEL, the categorical findings rendered are reproduced hereinbelow for the convenience of this Hon'ble Commission:

13.15 After careful consideration and analysis of the submissions of both the parties, it transpires that as per the ruling of the State Commission in the impugned order, the telecom towers registered under the State Govt. Policy would be classified as Industry and other telecom towers would be classified as commercial which is contrary to Section 62(3) of the Electricity Act, 2003. The very rationale adopted by the State Commission in granting industrial tariff to mobile/telecom towers was that these services are essential in nature and tantamount to industrial category despite having no manufacturing activities. It is noticed that vide the impugned order, it is noted that all mobile/telecom towers have been put under commercial category but the only criteria for their decision is the registration under the IT/ITES Policy of Govt. of Maharashtra. Resultantly, such pre-requisite condition may put some towers under industrial category and some towers under commercial category which is contrary to the purpose of electricity classification due to the same. Moreover, it has been presented by the Appellants during proceedings that they are registered under the IT/ITES Policy and some sample certificates have also been produced before us. It is thus clear that the discom/MSEDCL is now insisting a separate certificate for each of the thousands old telecom towers of the Appellants to avail the industrial tariff. Further, the fact that the mobile towers and related installments of the Appellants were treated and covered in the definition of IT/ITES under the policy of the Govt. of Maharashtra will also be evident from the registration certificate issued by the Govt. for the said installments of the Appellants right since the year 2004. We have taken note of various judgments relied upon by the parties

	<p>and the National Telecom Policy, 2012 which provides that telecom services are part and sub-set of the information technologies and hence as industrial units. It is also relevant to note that based on the nature of services, essential services including Telecom services have been recognised as important infrastructure, public utility services, essential services etc. and have been considered under the incentive scheme as far as electricity tariff is concerned. For instance, airports, hospitals, cold storage, LPG/CNG bottling plants etc. have been considered under the industrial tariff which clearly do not involve manufacturing activities.”</p> <p>13.16 In view of above facts, we opine that the State Commission has not adequately considered the express provisions of the Electricity Act and various policies of the State/Central Govt. while passing the impugned order and thus violates the statutory provisions.”</p> <p>A copy of the Order dated 12.02.2020, passed by the Hon’ble APTEL in Appeal No. 337 of 2016 is filed herewith as Annexure No. 4</p>	
14	<p>Pursuant to the decision of the Hon’ble APTEL, the Ld. MERC, vide its order dated 30.03.2020 in Case no. 322/2019, directed that Industrial Tariff be made applicable to Telecom industries, irrespective of the fact whether they were registered under the IT/ITES Policy of the Government of Maharashtra, or not.</p> <p>Pg no. 489 of 752</p>	No comments

B.11.5 IT and ITeS Units: Under existing tariff structure, IT and ITeS units having registration certificate under GoM's IT and ITeS Policy are categorised under Industrial Category. The APTEL in its Judgment dated 12 February, 2020 in Appeal No. 337 of 2016 & Others has ruled that tariff categorisation cannot be based on any certification under Policy and it should be based on criteria specified under Section 62(3) of the Act. Accordingly, the Commission has removed the requirement of having certification under GoM Policy for claiming Industrial Tariff for IT and ITeS Units.

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HIGH TENSION (HT) TARIFF

HT I (A): Industry – General Applicability:

This tariff category is applicable for electricity for Industrial use at High Voltage for purposes of manufacturing and processing, including electricity used within such premises for general lighting, heating/cooling, etc.

It is also applicable for use of electricity/power supply for Administrative Offices/Canteen, Recreation Hall/Sports Club or facilities/Health Club or facilities/Gymnasium/Swimming Pool exclusively meant for employees of the industry; lifts, water pumps, fire-fighting pumps and equipment, street and common area lighting; Research and Development units, etc.

Provided that all such facilities are situated within the same

	<p>industrial premises and supplied power from the same point of supply.</p> <p>This tariff category shall be applicable for use of electricity/power supply by an Information Technology (IT) or IT-enabled Services (ITeS) Unit as defined in the applicable IT/ITES Policy of Government of Maharashtra.</p> <p>It shall also be applicable for use of electricity/power supply for (but not limited to) the following purposes:</p> <ol style="list-style-type: none">1. Flour Mills, Dal Mills, Rice Mills, Poha Mills, Masala Mills, Saw Mills.2. Ice Factories, Ice-cream manufacturing units, Milk Processing & Chilling Plants (Dairies).3. Engineering Workshops, Engineering Goods manufacturing units, Printing Presses, Transformer Repair Workshops, Tyre Remoulding/Retreading units, and Vulcanizing units.4. Mining, Quarrying and Stone Crushing units.5. Garment Manufacturing units.6. LPG/CNG bottling plants, etc.7. Sewage Treatment Plant/Common Effluent Treatment Plant for industries, and not covered under the HT – PWW category.8. Start-up power for Generating Plants, i.e., the power required for trial run of a Power Plant during commissioning of the Unit and its auxiliaries, and for its start-up after planned or forced outage (but not for construction).	
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	<p>9. Brick Kiln (Bhatti).</p> <p>10. Biotechnology Industries covered under the Biotechnology Policy of Government of Maharashtra.</p> <p>11. Cold Storages not covered under HT – Agriculture (Others).</p> <p>12. Food (including Seafood and meat) Processing units.</p> <p>13. Stand-alone Research and Development units.</p> <p>14. Seed manufacturing.</p> <p>15. Dedicated Water Supply Schemes to Power Plants.</p> <p>16. Auxiliary Power Supply to EHV/Distribution Substations (but not for construction).</p>	
15	<p>In furtherance to the aforementioned order of the MERC, the Maharashtra State Electricity Distribution Company Ltd. vide Circular Order No. 323 dated 03.04.2020 has revised the electricity tariff for telecommunication towers by placing them in the Industrial Category. A copy of the aforementioned Circular is filed herewith as Annexure No.6</p>	No comments
16	<p>It is further submitted that Ld. MERC in its Mid-Term Review Order dated 31.03.2023, for MSEDCL for Truing-up of ARR for FY 2019-20, FY 2020-21 and FY 2021-22, Provisional Truing-up of ARR for FY 2022-23 and revised ARR for FY 2023-24 and FY 2024-25 has revised the electricity tariff for telecommunication towers by categorising them in the LT V: LT-Industry rate schedule. The relevant extract of the order is being outlined below:</p> <p>LT V: LT- Industry. Applicability</p>	No comments

	<p><i>This tariff category shall also be applicable for use of electricity/power supply by an Information Technology (IT) or IT-enabled Services (ITeS) Unit as defined in the applicable IT/ITeS Policy of Government of Maharashtra...</i></p> <p>A copy of the Ld. MERC order dated 31.03.2023 is filed herewith as Annexure No.7</p>	
17	<p>It is submitted that the Learned Himachal Pradesh Electricity Regulatory Commission (“Ld. HPERC”) vide its Order dated 31.03.2023, in the petition for Fourth Annual Performance Review Order for 4th MYT Control Period (FY20-FY24) & Determination of Tariff for FY24 & True-up of FY22 of 4th MYT Control Period for Himachal Pradesh State Electricity Board Limited (“HPSEBL”) has re-categorised Tele-communication Towers as IT and IT-enabled services to be included within the Industry (General) Tariff Category.</p> <p>The relevant extract of the aforementioned order is being outlined below:</p> <p>“Categorisation of Tele-communication Towers 8.6.21 Bharti Airtel has requested the Commission to categorize telecommunication towers under the Industry (General) Tariff Category, by prescribing a new Sub-category for IT and IT-enabled services. 8.6.22 The Commission has scrutinized the submissions of the Stakeholder and approve inclusion of Tele-communication Towers as IT and IT enabled services to be included within the Industry (General) Tariff Category.”</p>	No comments

	A copy of the order dated 31.03.2023, passed by the Ld. HPERC is filed herewith as Annexure No.8.	
18	It is submitted that the Information Technology, Electronics and Communications (Promotions) Department, Government of Telangana published ICT Policy ('ICT Policy') addressing the current needs of the industry. The Goal of the ICT Policy 2021-2026 is to achieve digital empowerment of every citizen, meaning that every citizen is fully aware of digital opportunities for his needs, and has the wherewithal to access them. A copy of the ICT policy is file herewith as Annexure 9	No comments
19	In the said ICT Policy, the State of Telangana has identified eight Focus Sectors such as Life Sciences and Healthcare, BFSI, Computing Systems, Automotive/Mobility, Semiconductors, Energy, Aerospace & Defence, Retail and Telecom as sectors with great potential to grow and to adopt digital-based solutions at a rapid pace in the next 5 years.	No comments
20	It is pertinent to submit that the Telecom Sector is a foundational pillar and acts as a backbone to the IT Industry. This is because fast internet and leased line connections provided by the Telecom Sector is foundational for smooth functioning and growth of the IT Industry. The ICT Policy as a measure for development of start-up ecosystem also highlights the importance of 5G Cellular networks which is directly dependent on the telecommunication towers has context menu	No comments
21	ICT Policy acknowledges that Hyderabad is one of the first cities in India which has had pilots for 5G communication services done by their telecom partners. That, in future, the State will formulate adequate strategies to enable citizens in both rural and urban locations to use 5G technology. In order to achieve this, the ICT	No comments

	Policy states that 'sufficient relaxations and the Right of Way orders will be provided to ease the entry of telecom service providers.	
22	Further, the ICT Policy expressly states that the State will provide certain incentives in power, certification, subsidies etc to IT and ITeS Companies to support the IT industry. As stated above, since the Telecom Sector is included within the IT Industry, incentives in power, certification etc should also be provided to the telecom sector. Therefore, it is submitted that industrial tariff should be made applicable to the telecom sector.	Under the purview of Hon'ble Commission
23	It is submitted that our company and several others in the Telecom Sector are incurring huge capital expenditure and operational costs in establishing 5G Cellular network. High costs are being incurred by Airtel to cater to the demand of 5G Cellular networks not only to the IT Industry but also to retail customers in the State of Telangana. One of the main and significant costs is the electricity tariff charged to the telecom towers. Currently, the Telecom towers are charged under the LT II (B) Non-Domestic/Commercial category of tariff. Under the current tariff applicability, the operational costs of telecom towers works out to a substantial amount which makes it difficult for the telecom companies to sustain such infrastructure.	Under the purview of Hon'ble Commission
24	It is submitted that the Telecom Regulatory Authority of India in its report titled, "Recommendations on Use of Street Furniture for Small Cell and Aerial Fiber Deployment" dated 29.11.2022, after careful examination of the functioning of the telecom sector and after having considered the vital role being played by the telecommunication and broadband service sector in the economic growth of connected areas and the charges currently raised for	Under the purview of Hon'ble Commission

	providing electricity to telecom sites are very high, as such, has also recommended that it is justified that telecom sites should be provided electricity connection at industrial/utility tariffs. Copy of the report dated 29.11.2022 is filed herewith as Annexure No. 10.	
25	It is submitted that Airtel currently has 10000 telecom towers in the State of Telangana and Electricity Consumption Details for the year 2023-24 are filed herewith as Annexure No. 11.	No comments.
26	It is submitted that additionally, enhanced fiberization is a must for 5G services and to achieve the targets fixed by the National Broadband Mission (NBM) of 50 lakh km fiberization, 70 per cent tower fiberization and 50 megabits per second speed of broadband. This would entail heavy capital expenditure, thus, raising the cost of telecom services, leading to a greater digital divide. According to the industry estimates, almost 30 per cent of the operational expense for the telecom towers goes into electricity tariffs, which works out to be a substantial amount, thus, making it crucial for this Hon'ble Commission to categorise the telecom companies under the industrial category, thereby, lowering the burden on the telecom companies which would indirectly lead to facilitating affordability of telecom services to the end customer.	Under the purview of Hon'ble Commission
27	It is submitted that the Information Technology, Electronics and Communications (Promotions) Department, Government of Andhra Pradesh vide G.O. MS. No.6 dated 16.07.2021 has notified the "Andhra Pradesh IT Policy 2021-2024" address the current needs of the industry. As per the AP IT Policy 2021 – 2024, the Telecommunications service provider has been defined as:	No comments.

	<p>“Telecommunication service provider includes basic telecom service providers (fixed), cellular (mobile) companies, telecom infrastructure companies, Internet Service Providers (ISP) and any other value-added services licensed by Ministry of Electronics and Information Technology (MeitY), Government of India.”</p> <p>It is further submitted that the AP IT Policy 2021-2024 has expressly included ‘Telecom’ within the ambit of IT Industry/IT Projects. Also, that the AP IT Policy 2021-2024 has expressly mandated under Paragraph 8 (vi) that all IT companies operating in Andhra Pradesh shall be eligible for industrial tariff towards their power consumption. As stated above, the AP IT Policy 202-2024 includes the Telecom Sector within the IT Industry, hence, in light of the same, industrial tariff was made applicable to the telecom sector. A copy of the Andhra Pradesh IT Policy 2021-2024 is filed herewith as Annexure No. 12.</p>	
28	<p>It is submitted that the Government of Maharashtra, as part of their IT/ITES policy notified the applicability of industrial tariff to the telecommunication towers instead of commercial tariff. It is submitted that the Maharashtra State Electricity Regulatory Commission (MSERC) after taking into consideration the IT/ITeS policy of the Government of Maharashtra specifically categorized Telecommunication Towers in the Industry Tariff vide its order dated 30.03.2020 in Case No. 322 of 2019, a copy of which is annexed herein as Annexure No. 5. A copy of the IT/ITeS policy of the Government of Maharashtra is filed herewith as Annexure No. 13.</p>	No comments.
29	<p>It is submitted that the National Tariff Policy, 2016 in clause 8.3 lays down principles for “<i>Tariff Design: Linkage of tariffs to cost of services</i>”. One of the principles specifically states that the tariff</p>	As per the clause 8.3(2) of the National Tariff policy- 2016, the Commission should notify a

	<p>should progressively reflect the cost of supply of electricity and suggests that appropriate commissions should take steps to ensure that the tariffs are within 20% of the average cost of supply of electricity. However, the present tariff in the State of Telangana in the commercial category is far more than the average cost of supply, especially for the telecom industry. It is pertinent to reiterate that the telecom infrastructure companies are incurring huge capital expenditure and operational costs to smoothly transition the 5G technology as per the Prime Minister's Gatishakthi Programme. The high commercial electricity tariffs currently being charged on the telecommunication towers are only adding to the existing difficulties such as low return on investments and poor revenue realization in rural areas. Hence, it is the need of the hour for this Hon'ble Commission to review the tariff under the ICT Policy and categorise telecommunication towers under i.e. LT III (A) tariff category i.e. the Industry (General) Tariff Category. A copy of the National Tariff Policy, 2016 is filed herewith as Annexure No. 14.</p>	<p>roadmap such that tariffs are brought within +/- 20% of Average Cost of Supply. The policy only talks about Average Cost of Supply and not about category cost of supply. The licensee would bring to the notice of the Hon'ble Commission that projected Average Cost of Supply for FY 2024-25 for the licensee is higher than approved Average Cost of Supply for FY 2023-24. In order to ensure cost recovery, the licensees have proposed to increase in tariff in light of increase of costs</p>
30	<p>It is submitted that increasing the tariff from INR 70/Kw to INR 150/Kw, as proposed, will pose a challenge to the industry, especially with the rapid increase in network. Any hike in fixed and variable charges will adversely impact the operational costs for this essential service. Hence, we pray to the Hon'ble Commission for reduction in fixed and variable charges, or, at best maintain at the current rate.</p>	<p>In the current tariff structure only 30% of the fixed cost is being recovered through fixed charges. The fixed charges constitute the fixed revenue of DISCOMs and are not reflective of the fixed costs incurred by them. Hence the DISCOMs request the Hon'ble Commission to approve the proposed tariffs. Full recovery of cost incurred by DISCOMs will enable delivery of quality, reliable and</p>

		uninterrupted power supply to its consumers
31	It is submitted that telecom Industry like all business establishment are in the business of marketing and selling their products and services. It is submitted that singling out Telecom Industry by holding that the telecommunication sector should be categorized as commercial merely because Telecom sector collects tariff from the people for the services provided is discriminatory in nature and not permissible in terms of Section 62 (3) of the Electricity Act.	Under the purview of Hon'ble Commission
32	It is submitted that this Hon'ble Commission has ample power under Sections 61, 62 and 86 of the Electricity Act, 2003 to revise the tariff for telecommunication towers from Commercial Tariff Category to Industrial Tariff Category.	Under the purview of Hon'ble Commission
33	It is submitted that the above stated policies of the Government of Telangana and the Government of India is to enable growth in the IT Industry, not only to attract investments but also in turn to generate employment and grow the infrastructure. Hence, in light of the same it is requested that this Hon'ble Commission may be pleased to consider the present request for change in tariff from Commercial Tariff Category to Industrial Tariff Category.	Under the purview of Hon'ble Commission
34	It is submitted that if the Telecommunication towers are not placed in the Industrial Tariff Category it will cause undue loss to the telecom sector and will hinder the development and progress of the telecom sector.	Under the purview of Hon'ble Commission

32. Response to West Winds Community

18	West Winds Community , West Winds Villa owners maintenance, Mutually Aided Cooperative society Ltd., Clubhouse Keerthi West winds Villas, Manchirevula(V), Gandipet(M), RangaReddy(D) – 500075	
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	With reference to the public notice dated 20th September 2024, inviting objections/suggestions on the Retail Supply Tariff Order for the year 2024-25, We are the residents of a residential Villas gated community. Our Community is a gated community having a single entrance to the public access road. All the houses within the Community are being exclusively used for the residential activity. Common facilities like Sewage Treatment Plant, Water Softener Plant, Borewells, Lighting for Park areas, Open spaces, play areas, streetlights, clubhouse including gym, guest rooms, halls, and are being arranged in our Community exclusively for the purpose of all the residents and not for any commercial activities.	No comments
2	Surprisingly, the ADE, Operation: Ibrahimbagh, the then TSSPDCL has issued an Assessment Notice for Back Billing Order No: DEA/GHMC/HYD/DAT.228447(INW.NO.7093/IBHB) D.N.O.12899 Dated: 21 February 2024 in the name of our community stating that our Community Service Connection bearing no. 310902186 was utilised for STP, Water Plant, Bores and Park area of the community, which comes under Category II, but the service is being billed under Category I. Further, the ADE has imposed back billing of Rs. 16,50,056/- and directed us to give appropriate representation to the notice, if we are not agreeable to the assessed amount. Accordingly, we have given a reply to the said notice and the same is pending before the ADE	The notice was issued for payment based on the nature of utilization of power supply in the premises falling under the appropriate category as per the Tariff Order.

	for disposal, the TGSPDCL has started charging our community service connection under LT-II category which is arbitrary	
3	It is pertinent to note that the aforesaid facilities provided within the common areas of our community serve as essential amenities for the residents' well-being and recreational needs within the community. Their primary function is to enhance the quality of life and foster a sense of community among the residents, emphasizing their domestic utility rather than commercial usage. These facilities are not open to the public and are exclusively used by residents of our villa community. There is no commercial activity or profit generation associated with their operation. These facilities within the common/shared areas of the residential Villas Community are not utilized for commercial purposes that generate revenue, and hence, they should not be categorized under the Commercial Category.	The activity mentioned does not fall under the domestic category as per the terms of the Tariff Order
4	Further, the Borewells are for drawing the water for domestic purposes of all the residents within the residents of Villas Community. Water plant is used for softening the bore water and STP is used for treating the sewage generated by the residents of the community, and they are not used for any commercial purposes. The Water Plant and Sewage Treatment Plants are critical infrastructure elements that ensure the proper treatment of drinking water drawn from the borewells and wastewater generated by the residents, respectively. Their primary function is to maintain a healthy and safe living environment for the residents, which aligns with domestic usage rather than commercial activities	The activity mentioned does not fall under the domestic category as per the terms of the Tariff Order
5	Similarly, the Gym and Swimming Pool are facilities that cater to the health and recreational needs of the residents. They are not intended for commercial use but instead serve as amenities for	The activity mentioned does not fall under the domestic category as per the terms of the

	<p>the residents to maintain their physical fitness and engage in leisure activities. The Clubhouse is a communal space where residents can gather, socialize, and participate in various activities, fostering a sense of community and social interaction among them. Further, the Park areas and streetlights are the basic necessities for the convenience of all the residents within the Villas Community</p>	Tariff Order
6	<p>The maintenance and electricity costs for these common services are borne by all residents collectively through monthly maintenance charges. This aligns with the domestic Category's principle of shared expenses for essential utilities within residential houses</p>	<p>The consumer is required to make the payment as per the relevant category as per the terms of the Tariff Order for utilization of supply in their premises.</p>
7	<p>It is imperative to recognize the distinct purpose of these common services within the villa community and appropriately classify them under the Domestic Category in the upcoming year's tariff order. Therefore, considering the purpose, usage, and cost-sharing structure of these common services, I request your Hon'ble Authority to specify their classification to the Domestic Category (LT-I(B)(ii)) for the Financial year 2024-25's tariff order. This aligns with the true nature of their usage and ensures fair and accurate billing for the residents</p>	

33. Response to G.R. Karunakar

19	G.R. Karunakar , Plot No.56, Lakshmi Mega Township, Ragannaguda, Abdullahpurmet, RR Dist, Hyderabad-501510	
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	At the outset, condonation request itself should not be considered. Paucity of time for collecting necessary information from their own departments and preparing ARR is their internal administrative inefficiency. Model code of conduct due to general elections has nothing to do with their internal official/homework.	There was a change in regulatory regime because of which DISCOMs needed to collect additional data for preparing the petitions. Moreover, due to the enforcement of model code of conduct, the DISCOMs could not file the petition. The DISCOMs have duly submitted the condonation of delay petition before the Hon'ble Commission stating these reasons
2	What is the cost of power procurement from Hyder/Thermal stations within the state? What is the cost of power purchase from other state-owned power stations and NTP? Why is there a difference? Are there any plans to make our state self-sufficient?	For FY 2024-25, requirement of 28,577 MU from TGGENCO Thermal stations at an average cost of INR 5.59 / unit, and requirement of 5,744 MU from TGGENCO Hydel stations at an average cost of INR 2.79 / unit is projected for Telangana State. Further, requirement of 32,520 MU at an average cost of INR 5.43 / unit is also projected for other thermal stations including Central Generating Stations, Sembcorp, Singareni, etc. The cost of power purchase has been determined based on the Fixed Cost and Variable Cost of the respective plants which is expected to vary depending on multitude of factors. The Licensee also strives to ensure that maximum power is procured from within the state on a best effort basis.
3	What are the reasons for failure of Sri Srisailam Hydal power generating stations? What is the cost of	Under the purview of TG GENCO

	repairing them? When are they going to be re-commissioned?	
4	What is the highest and lowest cost of procurement of solar power till date?	The cost of procurement of solar power ranges from INR 2.4 / unit to INR 10.4 / unit
5	What is the extent of land (forest or other) procured to erect solar power generating stations?	Not under the purview of DISCOM
6	What is the status of implementation of PM-KUSUM schemes A, B, and C?	Invitation of tenders is under process
7	How many houses/consumers have adopted "Surya ghar"?	Around 2,000 consumers have adopted "Surya ghar"
8	What are the distribution losses in different circles?	Urban circles have distribution losses of 4.8% and rural circles have distribution losses of 7.5%.
9	What are the number of illegal/unauthorized domestic, industrial, and commercial power connections in various circles, and what is the action mooted? Is there any plan/programme for regularization of them?	Theft cases are booked for all illegal and tampered connections for different types of consumers. Stringent action taken such as levying penalty and arresting of consumers.
10	What are the dues from central and state government offices for consuming power?	The dues from State Government Offices is approximately INR 50 Crores.
11	What and how much power is consumed by various departments and sections of the society who are provided power at subsidized rates and free power? What is the loss/burden? Is the state government compensating the same, and to what extent?	Category wise energy consumption is available in the petition filed by the licensee. The Government of Telangana is providing subsidy to agricultural and domestic consumers every year. Moreover, industrial and commercial consumers also cross subsidize domestic

		and agricultural consumers to some extent.
12	Details of subsidized power tariffs to various categories of consumers in other states.	The details of power tariffs of different States can be downloaded from the websites of respective State Distribution companies or State Electricity Regulatory Commission

34. Response to Indian Energy Exchange

20	Indian Energy Exchange , Plot No – C001/A/1, 9 th Floor, Max Towers Sector 16B, Noida, UP – 201 301	
S.No.	Summary of Objections / Suggestions	Response of the Licensee
<p>Letter dated 11th October 2024 with subject “Comments/ Suggestions on the Petition filed by Southern Power Distribution Company of Telangana Ltd (TGSPDCL) and Northern Power Distribution Company of Telangana Ltd (TGNPDCL) for approval of ARR & Proposed Wheeling Tariffs for Distribution Business for 5th Control Period (FY 2024-25 to FY 2028-29</p>		
1	<p>The Distribution Licensees of the state of Telangana viz. Southern Power Distribution Company of Telangana Ltd. and Northern Power Distribution Company of Telangana Ltd. (hereinafter referred to as “TGSPDCL and TGNPDCL” or collectively as “Licensees” or “Petitioners” or “DISCOMs”) have filed the present Petitions before the Hon’ble Telangana State Electricity Regulatory Commission (hereinafter referred to as ‘Hon’ble Commission’) for approval of ARR & Proposed Wheeling Tariffs for Distribution Business for 5th Control Period (FY 2024-25 to FY 2028-29) in accordance with the provisions of TSERC Tariff Regulations.</p>	No Comments
2	<p>IEX is submitting its views and observations on the Tariff Petition filed by the DISCOMs in subsequent paragraphs.</p>	No Comments
3a.	<p>Computation of Voltage Wise Wheeling Charges in Rs./ kVA/ hr for short term open access</p>	No Comments

	<p>As against the submission of the Petitioner DISCOMs, the Hon'ble Commission in the past ARR and Wheeling Tariffs Order for Distribution Business for 4th Control Period (FY 2019-20 to FY 2023-24) dated 29.04.2020, has determined voltage wise wheeling charges for 11 kV, 33 kV and LT network connected consumers.</p>	
3b.	<p>Further, as per regulation 79.2 of the (Multi Year Tariff) Regulation, 2023, the Hon'ble Commission has specified that the wheeling charges shall be determined separately for LT voltage, 11 kV and 33 kV voltage. Relevant extract of the Regulations is provided below:</p> <p><i>"79.2 The Wheeling Charges of the Distribution Licensee shall be determined by the Commission on the basis of a petition for determination of Tariff filed by the Distribution Licensee:</i></p> <p><i>Provided that the Wheeling Charges shall be denominated in terms of Rupees/kVA/month for long-term and medium-term Open Access and in terms of Rupees/kVA/hr for short-term Open Access, for the purpose of recovery from the Distribution System User, or any such denomination, as may be stipulated by the Commission:</i></p> <p><i>Provided further that the Wheeling Charges shall be determined separately for LT voltage, 11 kV voltage and 33 kV voltage, as applicable."</i></p>	<p>Discoms have put forward this proposal, which is a suggestion (not mandatory) before the Hon'ble Commission by citing notification issued by Ministry of Power, dated 10th January 2024 and notification dated 17th January 2024.</p> <p>The proposal for moving towards uniform wheeling charges and losses similar to the systems adopted by inter-state and intra-state transmission system would lead to a simplified tariff structure, bring in transparency in billing process and would help in streamlining the process of grid planning going further. This would also help in improving administrative efficiency and lead to better resource allocation and lesser disputes related to undue variations in wheeling charges being levied on</p>

	<p>The distribution licensee in the present Petition has claimed single wheeling charges with no voltage wise bifurcation, which does not conform to the regulations notified by the Hon'ble Commission. Further, Open Access consumers are utilizing HT network only, as they are allowed connections at 11 kV and above; therefore, levy of LT network wheeling charges on the consumers may be irrational.</p>	<p>consumers.</p> <p>Further with distributed generation picking up pace, every consumer going further would become a prosumer and voltage wise segregation for levying wheeling charges may be of very little significance.</p>
3c.	<p>Further, the above regulation also entails that the wheeling charges for short term open access shall be determined and applicable at Rupees/ kVA/ hr, however the distribution licensees have claimed wheeling charges at Rupees/ MW/ Month which is not aligned with the Regulations notified by the Hon'ble Commission.</p>	<p>Discoms have proposed uniform wheeling charges across voltage levels similar to intra state and inter state transmission charges to encourage open access consumption across all voltage levels</p>
<p>Letter dated 11th October 2024 with subject "Comments/ Suggestions on the Petition filed by Southern Power Distribution Company of Telangana Ltd (TGSPDCL) and Northern Power Distribution Company of Telangana Ltd (TGSPDCL) for approval of ARR for Retail Supply Business for 5th Control Period (FY 2024-25 to FY 2028-29) and Tariff proposals for FY 2024-25</p>		
1	<p>The Distribution Licensees of the state of Telangana viz. Southern power Distribution Company of Telangana Ltd and Northern Power Distribution Company of TelanganaLtd (hereinafter referred to as 'TGSPDCL and TGSPDCL' or collectively as 'Licensees, or'Petitioners'or'Discoms') have filed the present Petitions before the Hon'bleTelangana State</p>	<p>No comment.</p>

	Electricity Regulatory Commission (hereinafter referred to as 'Hon'ble Commission') for determination of Aggregate Revenue Requirement for Retail Supply Business for 5 th Control Period i.e., from FY 2024-25 to FY 2028-29 & Tariff Proposals for FY 2024-25 in accordance with the provisions of TSERC Tariff Regulations	
2	IEX is submitting its views and observations on the Tariff Petition filed by the Discoms in subsequent paragraphs	No comment.
3	<p>Restricting CSS to 20% of Average Cost of Supply (ACoS)</p> <p>a. The Petitioner in the present proposal has requested the Hon'ble Commission not to restrict the CSS to 20% of tariff payable by the consumer as the tariffs are not within +/- 20% of Average Cost of supply.</p> <p>b. The Ministry of Power has amended the Electricity Rutes, 2005, and notified the Electricity (Amendment) Rutes, 2022 on 29.12.2022, wherein, the Ministry has capped the cross subsidy surcharge on open access at 20% of the Average Cost of Supply. Since the tariffs are being set with reference to the ACoS, the Hon'ble Commission is requested to cap the surcharge on open access with reference to the ACoS, in line with the Electricity (Amendment) Rutes, 2022. Relevant</p>	<p>The licensee has determined CSS as per the clause 8.5.1 of National Tariff Policy-2016. The National Tariff Policy-2016 states that CSS shall not exceed 20% of the tariff applicable to the category of consumers seeking open access and licensee has followed the same. Hence CSS has been restricted to 20% of Average Billing Rate (ABR) of that category.</p>

section

of the rules is provided below:

"13. Surcharge payable by Consumers seeking Open Access- The surcharge, determined by the State Commission under clause (a) of subsection(1) of section 86 of the Electricity Act,2003 shall not exceed twentypercent of the average cost of supply."

c. In line with the above submission, it is understood that the CSS computed by the Petitioner should be limited to the 20% of the average cost of supply. The table below shows the CSS claimed and the CSS applicable as per the MoP Electricity(Amendment) Rules, 2022.

	CSS Claimed	Average Cost of Supply (ACoS) for HT Category	CSS limit of 20% of ACoS
HT Category at 11 kV- HT I Industry segregated	1.95	5.89	1.178
HT Category at 33 kV- HT I Industry segregated	1.68	5.89	1.178

	HT Category at 132 kV- HT I Industry segregated	1.58	5.89	1.178	
4	In view of the above, we request the Hon'ble Commission to align the capping limit of CSS with the MoP Electricity (Amendment) Rutes, 2022			The Commission is requested to approve the CSS restricted to 20% of the ABR for the relevant categories.	

35. Response to Prayas (Energy Group)

21	Prayas (Energy Group) , Unit III A&B, Devgiri, Joshi Rail Museum Lane, Kothrud, Pune, Maharashtra, 411038, India	
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	Process Suggestions	
	<p><u>Limitation of time</u></p> <p>Eight petitions are to undergo a public regulatory process in a short period of 90 days.1 Petitions were available on the website in mid-September, objections are to be filed by 11/10/2024 and public hearing is proposed in the 4th week of October and the term of the current Honourable Commission ends in end October. The relevant MYT Regulation (2 of 2023) was issued on 31/12/2023 and petitions were to be filed by 31/01/2024. From the available documents, it appears that petitions have been submitted from Jul 2024 onwards, but, after iterations including those with Hon'ble TGERC, the public process has started only in mid-September.</p> <p>Utilities have given reasons for the delay and requested to condone the delay. But it is impossible for the public to provide quality inputs to so many petitions in such a short time. Fresh petitions for FY26 are due on 30/11/2024, which is only 2 months away.</p> <p>We do hope that this is not repeated in future by the DISCOMs and in case of delay, Hon'ble TGERC would initiate Suo-motu tariff revision process, with available data. **license conditions</p>	<p>The decision to initiate Suo-moto tariff revision process lies solely with the Hon'ble Commission</p>

	<p><u>Petitions</u></p> <p>Petitions are expected to be prepared as per the 2023 MYT Regulations and there are some welcome improvements. Utilities have provided spreadsheet files for supply, wires, transmission and GENCO submissions. A few observations based on a quick study:</p> <ul style="list-style-type: none"> • The DISCOM RSB & DB formats have 30+ sheets listed, but Form 15 to Form 22 are not available for TGNPDCL • There is difference in the way both DISCOMs have provided data in the ARR/FPT petition. For example, in the performance parameters, TGSP provides consolidated accident data for two years (FY23 and FY24) and gives break up across public, department staff and contract staff. TGNP gives FY23 and FY24 data separately, but does not give such a break-up. TGNP, in response to Directives (pp 96-97 of the supply petition), provides causes of electrical accidents of FY24. TGSP does not provide such data. TGNP DISCOM business petition has Additional information has Annexures, giving details of Smart metering plan for next 5 years. TGSP does not have this. 	No comments						
2	ARR and tariff petitions of DISCOMs							
	<p><u>Power purchase – improving the energy mix</u></p> <p>Telangana power mix is heavily based on coal-based generation. Table 1 gives the proposed mix as per the TGERC Resource Plan order (dated 29/12/2023) and Table 2 is a summary based on the current DISCOM supply petitions. It can be seen that there is no proposed plan to increase the proportion of Renewable energy, as is the national trend, to address climate challenges and reduce power purchase cost.</p> <p>Table 1: Supply mix as per Resource Plan order</p> <table border="1" data-bbox="325 1360 667 1416"> <thead> <tr> <th>Source</th> <th>FY25</th> <th>FY29</th> </tr> </thead> <tbody> <tr> <td>Thermal</td> <td>78%</td> <td>79%</td> </tr> </tbody> </table>	Source	FY25	FY29	Thermal	78%	79%	<p>The amount indicated as the sale of surplus power is net of the power purchase cost and is the difference between the average market rate and the average variable cost of the respective stations. Hence, the value indicated is the revenue of DISCOMs from the sale of surplus power net of power purchase cost.</p>
Source	FY25	FY29						
Thermal	78%	79%						

Hydro	3%	3%
NCE	19%	18%
Energy MU	96,641	1,03,534

Table 2: Supply mix as per DISCOM petitions

Source	FY25	FY29
Thermal	72%	71%
Hydro	7%	5%
NCE	16%	19%
Market	6%	5%
Energy MU	85,235	1,19,060
Surplus MU	11.1%	-
APPC Rs/U	5.27	5.62

There is a slight reduction in the proportion of thermal (compared to Resource plan), but that could be attributed to the market purchase. As can be seen from Table 2, the Average Power Purchase (APPC) will increase in the coming years, due to coal domination. These are projected costs, and actual cost could be higher. The projected proportion of NCE in FY29 is low at 19% against the MoP's RPPO target of 41.36% in FY29.

The proportion of thermal power would further increase if the proposed 800 MW plant at Ramagundem as a JV between GENCO and SCCL materialises. On the other hand, there have been news reports of TG renewable energy, proposing addition of 20,000 MW of RE capacity in TG by FY30

But as per the petitions, there is expected power surplus in FY25, which is 11% of dispatched energy. Petition also indicates that revenue from surplus sale in FY25

	<p>is at Rs. 2.32/Unit, much lower than the APPC. Even though no surplus is indicated in subsequent years, the reason could be the optimistic sales forecast. Planning for such high amounts of costly base capacity which may not be dispatched, will only add to costs.</p> <p>There is a need to revisit the power purchase plan of DISCOMs, with reasonable sales forecast (as mentioned in the next section). To optimise power purchase cost, it is good to plan for higher proportion of renewable, with required storage for grid balancing. DISCOMs should not enter into long term PPAs with any plants which are not part of an optimised Resource Plan. If needed, the current Resource Plan could be revised through a Regulatory process.</p> <p>TGGENCO also has to play a significant role in energy transition. Their thermal power plants need to become more flexible and they can also plan renewable energy projects.</p>					
	<p><u>Sales forecast</u></p> <p>Sales forecast is even higher than the recently finalised Resource Plan order. During the public hearings on Resource Plan, Prayas had submitted that four major categories (LT Domestic, LT Agriculture, HT Industry and HT Commercial) drive sales and had advised close scrutiny of the forecast in these categories. The projections in the petition appear quite optimistic from Table 3, which gives the growth rate adopted for FY25 by TGSPDCL.</p> <p>Table 3: Growth rate considered by TGSPDCL for FY25</p> <table border="1"> <thead> <tr> <th>Category</th> <th>FY25</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> </tr> </tbody> </table>	Category	FY25			<p>The licensees have almost achieved/exceeded the sales approved in Resource Plan for FY 2024-25 in FY 2023-24 itself. Hence the licensees have not considered sales as per resource plan for projections for 5th Control period. Moreover, the licensees have estimated sales for 5th Control period based on FY 2023-24 actual sales as</p>
Category	FY25					

LT Domestic 5.97
 LT commercial **17.7**
 LT Agriculture 1.39
 HT 132 kV comml **36.5**
 HT 132 Industry **30.99**

The highlighted growth rates appear quite optimistic. Figures are equally high for subsequent years also. From this petition, annual growth rates of HT Agriculture have been reduced, compared to 10%, that was considered in the Resource Plan order. The category-wise growth rates are not that high for TGNPDCL.

NPDCL Sales: In fact, over the years, proportion of NPDCL appears to be reducing, from 30% in FY18 to 23% in FY29, as seen in Table 4. As per the Resource Plan order, this proportion is 27.5% in FY29.

Table 4: Declining sales proportion of NPDCL

% Sales/Year	FY18	FY19	FY20	FY21	FY22	FY23	FY24	FY25	FY26	FY27	FY28	FY29
TGNPDCL	30	30	32	33	30	28	28	27	26	25	24	23
TGSPDCL	70	70	68	67	70	72	72	73	74	75	76	77
Total MU	50,562	57,538	58,522	57,049	61,154	67,791	74,442	75,895	81,409	89,331	97,932	1,07,291

We request DISCOMs to provide an explanation for this reducing trend of TGNPDCL sales and the deviation from the Resource Plan order.

compared to resource plan projections which are based on FY 2022-23 H1 actuals and H2 projections

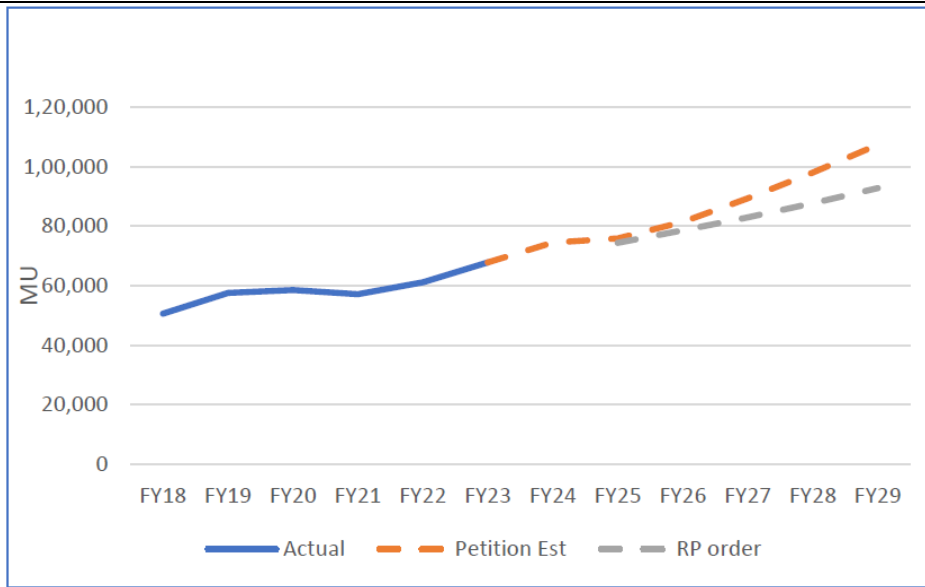
There is a rise in industrial and commercial activity post COVID and the licensee expects the same trend to continue in the future. Moreover, increase of IT parks/SEZ/Industries/pharma city etc. is anticipated by licensees which results in higher industrial and commercial activities. Hence, Licensees feel it is prudent to consider higher growth rates for Industrial and commercial consumption, given the expected increase in these activities. Any deviation in actual sales as compared to approved sales, which would result in deviation of Power Purchase cost as well as revenue would be adjusted in True-up filings.

Historically LIS sales have been erratic. There has been a reduction in Actual LIS

		<p>sales for FY 2023-24 as compared to approved sales. The reasons are multifold: Delay in commissioning of projects, Lower than expected Monsoon etc. Hence, the licensee has considered LIS sales projections for FY 2024-25 to be same as FY 2023-24. Any deviation in actual sales as compared to approved sales, which would result in deviation of Power Purchase cost as well as revenue would be adjusted in True-up filings</p> <p>The sales of SPDCL and NPDCL have been determined independently based on their respective historical actual sales and growth rates and hence the sales pattern of both DISCOMs needs to be looked at independently</p>
	<p>As for LT Agriculture, the growth rate considered is lower than what was used in Resource Plan order. But it is reported that consumption in FY24 was very high (30% over FY23 figure for TGSP and 20% for TGNP). Issues about Agriculture estimation have been raised many times, and the Hon'ble TGERC had directed</p>	<p>The discoms proposed to segregate the AGL feeders for better apportioning of</p>

<p>DISCOMs to meter all Agriculture DTs to improve the estimate. DISCOMs have been committing to carry out this, but in the petitions this year, they have clearly indicated that DT metering is not in the agenda. This is clear from the response to TGERC’s directive, as shown below.</p> <p>New Directive 5:</p> <p><i>“The Commission directs the TGDISCOMs to achieve 100% Agricultural DTR metering within a period of twelve (12) months and to furnish the quarterly progress on the status of implementation in this regard.”</i></p> <p>TGSPDCL Response: <i>“Under RDSS, MoP has laid emphasis on Segregation of Agriculture feeders through which all the agriculture loads will be segregated onto separate feeders. All the feeders in TGSPDCL were already equipped with feeder meters (DLMS). Now that under RDSS, all feeder meters are to be metered with communicable & AMI/AMR meters. If we take up segregation of Agriculture feeders under RDSS, we can assess the agriculture consumption with feeder meter data itself without fixing meters to agriculture DTRs” (Report is submitted to Hon’ble TGERC on 19/8/2023)</i></p> <p>It is unfortunate that the DISCOMs are backing up from the relatively easy task of metering DTs. RDSS proposals will need approval from Gol and feeder separation will take many years to be implemented.</p> <p>As has been requested last year too, Hon’ble TGERC could consider setting up a committee to revise the current methods of estimation of agriculture consumption,</p>	<p>AGL consumptions after approval of RDSS scheme of MoP, Gol to reduce the cost of AGL DTR metering.</p>
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	since this has a significant bearing on subsidy and DISCOM AT&C losses.	
	<p>Open access: There is another important related point about open access in TG. From the petitions, we gather that there is low or no growth in OA consumption or revenue. Hon'ble TGERC may wish to review the implementation of its Open Access and Green Open Access Regulations in the state. Tracking and reporting of Open Access consumption in the state is important from a DISCOM planning perspective. Going forward, with the notification of Green Energy Open Access regulations, reporting of RE and non-RE based sales migration will also be integral, across varying ranges of contracted demand. Separate reporting of RE and non-RE OA, along with their tenure, is already a practice that Maharashtra and Rajasthan ERC follow as part of their tariff formats. Bihar ERC also reports the number of applications received and processed, along with the total quantum of power availed by OA in the year (in MUs). Given these good practices being followed in other states, TS DISCOMs are requested to submit data as per the following suggested format given in Annexure 1</p>	<p>The data made available as additional information to the Hon'ble Commission. The decrease in revenue from OA consumptions is due to exemption of additional surcharge to GEOA consumers passed by the Hon'ble commission in its order.</p>
	<p>Figure 1: Sales trend of TG DISCOMs</p>	<p>As explained earlier, the licensees have almost achieved/exceeded the sales approved in Resource Plan for FY 2024-25 in FY 2023-24 itself. Hence the licensees have not considered sales as per resource plan for projections for 5th Control period. Moreover, the licensees have estimated sales for 5th Control period based on FY 2023-24 actual sales as compared to resource plan</p>



To summarise, sales forecast of DISCOMs appear highly optimistic. The CAGR of total sales in TG in the period FY18-23 was 6% and the CAGR for FY25-29 as per the Resource Plan order (issued as recently as December 2023) was close to it, at 5.7%. DISCOM petitions submitted as part of the Resource plan process also had CAGR for FY25-29 as 5.87%. But as per the DISCOM petitions, CAGR for FY25-29 is 9%. Figure 1 plots the sales trends – actuals for FY18-23, Resource Plan order for FY25-29 and DISCOM petition for the same period. There is a need for DISCOMs to rigorously review the sales forecast. We request the Hon’ble TGERC to direct the DISCOMs to undertake this within a specified time and if needed revise the Resource Plan.

projections which are based on FY 2022-23 H1 actuals and H2 projections. Any deviation in actual sales as compared to approved sales, which would result in deviation of Power Purchase cost as well as revenue would be adjusted in True-up filings

Tariff proposals

Petitions propose upward revision of Fixed Charges (FC) for high domestic (> 300 Units/month), and many other categories. Percentage increase of FC is higher for LT, compared to HT. The basis for such an increase could be provided.

The licensee would bring to the notice of the Hon’ble Commission that projected Average Cost of Supply for FY 2024-25 for the licensee

		<p>is higher than approved Average Cost of Supply for FY 2023-24. In order to ensure cost recovery, the licensees have proposed to increase in tariff in light of increase of costs.</p> <p>In the current tariff structure only 30% of the fixed cost is being recovered through fixed charges. The fixed charges constitute the fixed revenue of DISCOMs and are not reflective of the fixed costs incurred by them. Hence the DISCOMs request the Hon'ble Commission to approve the proposed tariffs. Full recovery of cost incurred by DISCOMs will enable delivery of quality, reliable and uninterrupted power supply to its consumers</p>
	<p>Tariff proposals</p> <p>Time of the Day tariff</p> <p>DISCOMs have proposed to continue the existing ToD framework, which gives 1</p>	<p>The Discoms will take up the change in the TOD timings in the ensuing filings to balance the demand and supply.</p>

Rs energy charge penalty during eight (supposedly peak) hours (0600-1000, 1800-2200) and 1 Rs energy charge rebate during eight (supposedly non-peak) hours (2200-0600). There is a need to revise this approach, based on a study of the daily and seasonal load and supply patterns to expand the scope and base of ToD. We give some suggestions in the following paragraphs.

A framework for ToD Tariffs was detailed in the recently notified Electricity (Rights of Consumers) Amendment Rules, 2023. The relevant section of these Rules, under the Electricity Act are quoted below:

“(8A) Time of Day Tariff

*The Time of Day tariff for **Commercial and Industrial consumers** having **maximum demand more than ten Kilowatt** shall be made effective from a date not later than **1st April, 2024** and for **other consumers** except agricultural consumers, the Time of Day tariff shall be made effective not later than **1st April, 2025** and a Time of Day tariff shall be made effective immediately after installation of smart meters, for the consumers with smart meters:*

*Provided that, the Time of Day Tariff specified by the State Commission for Commercial and **Industrial consumers** during **peak period** of the day shall not be less than **1.20** times the normal tariff and for other consumers, it shall not be less than 1.10 times the normal tariff:*

*Provided further that, tariff for **solar hours of the day**, specified by the State Commission shall be **atleast twenty percentless** than the normal tariff for that category of consumers:*

*Provided also that the Time of Day Tariff shall be applicable on **energy charge component** of the normal tariff:*

*Provided also that the duration of **peak hours shall not be more than solar hours** as notified by the State Commission or State Load Despatch Centre.”
(emphasis added)*

This framework is reflective of recent changes in demand and supply profiles in states, where low-cost renewable energy (RE), especially solar is available during day-time.

ToD tariffs reflective of demand-supply profiles also assist with cost reflective pricing for DISCOMs. In the long-run, if tariffs are reflective of costs in peak and off-peak periods, ToD tariffs can also help smoothening demand and reducing the requirement for additional investments and capacity.

However, the national framework should ideally be adapted to suit state context, demand supply profiles and existing metering infrastructure.

In this context, the following framework is suggested for Telangana:

- **Applicability:** ToD should be applicable on all HT consumers and LT Commercial and Industrial consumers with load > 20 kW. Within 2 years, ToD tariffs should be levied on all consumers with MD > say 2 kW using smart meters and consumers with RTPV especially net metering.
- **Framework:** Based on trends in Telangana’s demand, net demand (demand minus solar and wind generation), the following slots and rates (expressed as a % of energy charges) are proposed, as shown in Table 5:

Time-Slot	05:00-10:00	10:00-15:00	15:00- 20:00	20:00 -05:00
Rebate		20%		
Surcharge	20%		20%	

In the proposed structure, there is no penalty between 20:00 to 05:00 which might also change with increase in demand and increased open access, captive, RTPV and banking requirements over time. Further seasonal variations in tariff are also likely. A seasonal increase in base tariff or a ToD slot-based mark-up based on a detailed study could also be considered.

We request Hon'ble TGERC to consider taking up an exercise to revise the current ToD design to suit the interests of the DISCOMs and the consumers.

Grid support and standby charges

DISCOMs have proposed introduction of Grid Support Charges (GSC) or Parallel Operation Charge (POC) for all captives – renewable or otherwise, co-located or otherwise. The proposal to calculate based on apportionment of R&M of network is reasonable, with the charge of Rs.19.37/kW/Month amounting to less than 5% of the FC for HT consumers and 15% for LT. Many states have been implementing a similar charge for captive.

DISCOMs should indicate the revenue expected from GSC, which we estimate to be quite low as of now. We request Hon'ble TGERC to consider a lower GSC for RE captive plants.

DISCOMs have proposed Standby charges for GEOA consumers, as temporary tariff or market price, whichever is higher. While this is reasonable, Hon'ble

Based on the directions of Hon'ble commission on its order on grid support charges the discoms have proposed GSC in accordance with the methodology specified by the Hon'ble Commission in the order

	<p>TGERC may wish to explore other more cost-reflective methods of implementing Standby charge, followed by states like Punjab and Maharashtra. In these states, GEOA consumers pay a commitment charge if they plan to depend on DISCOM, in addition to a high energy charge for use.</p> <p><i>Punjab: Punjab ERC has introduced a commitment charge framework, where OA consumers are required to pay monthly commitment charges (ranging from Rs. 35 to Rs. 60 per kVA, depending on the number of days for which standby power is availed) regardless of whether standby power is used. For unplanned, standby power, the charge is 1.25 times of the tariff. With day ahead notice, the charge is the same as the tariff.</i></p> <p><i>Maharashtra: Maharashtra ERC employs a four-tier differential standby charge system for captive consumers: i) 25% of the monthly demand charges when standby is not used, ii) 100% of the demand charges when standby is requested but not utilised, iii) 150% of the demand charges if recorded demand exceeds the contracted demand, and iv) 200% of the demand charges if standby is not opted for, but service is still provided.</i></p>	
	<p><u>Quality of supply & service</u></p> <p>Performance reports in the DISCOM petition provide some details about quality of supply and service indicators. While these are good, providing spreadsheets for these Tables will ease study and analysis. As we have repeatedly pointed out, what matters is the trend of these parameters over the years, and analysis of the data to arrive at key aspects that affect the consumers.</p> <p>Accident information is given by both DISCOMs, and as mentioned before, TGSP gives consolidated data for 2 years. We request the DISCOMs to provide data for</p>	<p>The data has been provided based on the formats approved by the hon'ble commission.</p> <p>The electrical accidents occurred in TGSPDCL during the FY 2023-24, it is to be noted that out of 288 fatal accidents occurred, 276 accidents are due to the</p>

<p>past 3 years to check if the trend in accidents. Since there have been many directives and efforts by the DISCOMs, there should be gradual reduction of accidents.</p> <p>TGNPDCL has given cause wise list of human and animal accidents in FY24 (pp 97 of TGNP petition). From a cursory analysis, of the 338 fatal human accidents, it appears that TGNPDCL is responsible for nearly 30%. This needs detailed explanation. Hon'ble TGERC had directed DISCOMs to conduct Root cause analysis of accidents, as per Earlier Directive 8. In their reply, TGSP has stated that: <i>"The report on the root cause analysis of electrical accidents during the second half H2 (i.e.Oct'2023 to Mar'24) of FY-2023-24 and the preventive measures adopted has been submitted to the Hon'ble Commission vide Lr.No.CGM (RAC)/SE (RAC)/ DE (RAC)/ F.C31/ D.No.191/24, Dated: 22.06.2024."</i></p> <p>We request the Hon'ble TGERC to make such reports of TGSP and TGNP available to the public by publication on website. This would help to get professional and local organisations involved in the efforts of DISCOMs to reduce accidents.</p> <p>From FY21, REC has been publishing Annual Consumer Service Rating (CSR) reports of DISCOMs, with the latest report available for FY23. These reports cover feeder outages, DT failures, Metering, Billing & Collection (MBC) complaints, Fuse out complaints etc. CSR reports are based on detailed inputs provided by the respective DISCOMs. Some DISCOMs have been uploading these detailed inputs on their websites. For example, APCPDCL website has spreadsheet versions of these inputs circle-wise & month-wise, such as Fuse out call details with summary, urban, industrial & rural feeder outage with hours of supply/interruptions/ SAIFI/SAIDI calculation, MBC complaint data etc. We request Hon'ble TGERC to</p>	<p>consumer faults, incautious of general public only, 12 nos. accidents were occurred due to departmental staff even after the utmost care taken by the staff of TGSPDCL and 5 are due to the contract labor of TGSPDCL. Hence, most of the accidents occurred are due to the inattentiveness of consumers by not following the safety measures, even after so many awareness programmes and advertisements conducted by TGSPDCL.</p> <p>As per the directions of the Hon'ble Commission, the DISCOMs are paying the ex-gratia to the victims, however the Commission has disallowed such expenses in the DISCOM filings.</p> <p>TG Discoms have been communicating the SOP reports to the Hon'ble Commission as per the schedules and the same are made available in the Hon'ble</p>
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	<p>direct the TG DISCOMs to provide similar information on their websites. Tracking such granular data over the years is important to ensure that there is ensure improvement of consumer quality of supply & service.</p> <p>Since there are many complaints regarding quality of supply and service, Hon'ble TGERC could consider revising the SoP Regulations of 2016. Considering the advances in metering and information technology, it is now possible to monitor violations of standards in a more granular fashion. There should be efforts to tighten the performance benchmarks, based on analysis of SoP reports submitted by DISCOMs, especially since a portion of RoE is now linked to performance.</p>	<p>Commission's website.</p> <p>The information has been provided to the Hon'ble Commission as per the formats prescribed by the Hon'ble Commission</p>
<p>3</p>	<p>MYT Petitions on Discom Network Business</p>	
	<p>DISCOM has proposed uniform wheeling charge of Rs 440/kVA/month for 33 kV, 11 kV and LT. This is as opposed to voltage based wheeling charge and loss in the previous MYT order. In Section 5 of the petition on Rationale of Wheeling charges, DISCOM has argued that Distributed RE (DRE), storage and wind-solar hybrid would increase network losses, due to reverse power flow. From the Additional information (Replies to TGERC queries), DISCOMs have not given any computation on the extent of reverse power flow and resultant increase in network losses. Conventional wisdom on DRE is that they help to reduce network losses, since they are located closer to consumption points. Are the DISCOMs expecting significant DRE installations, with capacity exceeding contracted load? Are distributed storage facilities being planned, which may increase reverse power flow? As per Net metering regulations, RTS is permitted only to some extent of loading of the DTR (50% to maximum 100%). Therefore, it is not clear how the duration and current would increase normal flows to increase losses. We request the DISCOMs to provide detailed calculations on this. Transmission is an interconnected grid and there is some logic in having similar wheeling charges for all voltages. It is not clear how the same logic is being applied for distribution</p>	<p>Government of India has a vision of increasing the share of RE to 50% of its total power capacity by 2030. As a result of which there is going to be increase in RE uptake from technologies such as solar and Wind. Further, this is also likely to improve the share of distributed RE generation where consumers would become prosumers. Distributed RE projects that are going to be grid connected would be injecting power into the grid. It is to</p>

	network.	<p>noted that as more and more households would be turning into prosumers, power flow would take place from LT side to higher voltage side during times of lower demand. As losses on the LT side are higher as compared to losses on the HT side, therefore it will lead higher losses for the Discoms as more generation start taking place on the LT side of the network. Further, ISTS network, STU network and the discom network are connected to each other hence the same logic that applies to Transmission network may also be extended to distribution network as India's grid is unified.</p> <p>The distribution licensee will take the steps to measure the actual quantum of reverse power and will be made available in the next filings depending on where the distributed generations</p>
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		are getting added on/ point of injection.																																								
	<p>Capex plans in the petitions of TGSP and TGNP mention the proposed plan to install smart meters for all non-agriculture consumers in the next five years. 42% of the total 28,402 Cr total capex of TGSP from FY25-29 and 30% of the Rs 11,816 Cr total capex of TGNP are earmarked for smart meters. Additional information provided by TGNP gives some details of the smart meter roll out plan, as indicated in Table 6.</p> <table border="1" data-bbox="323 548 1438 1101"> <thead> <tr> <th>Type of Meter</th> <th>Unit Rate Rs</th> <th>Qty Nos</th> <th>Cost Rs Cr</th> <th>% of cost</th> </tr> </thead> <tbody> <tr> <td>Sph whole current Smart Meter - Consumer Meter</td> <td>6,000</td> <td>55,50,500</td> <td>3,330</td> <td>94</td> </tr> <tr> <td>3ph whole current smart Meter - Consumer Meter</td> <td>6,000</td> <td>1,27,496</td> <td>76</td> <td>2.1</td> </tr> <tr> <td>3Ph LT -CT operated Smart Meter - Consumer Meter</td> <td>6,000</td> <td>19,917</td> <td>12</td> <td>0</td> </tr> <tr> <td>3Ph LT -CT operated Smart Meter - DT Meter</td> <td>23,000</td> <td>39,366</td> <td>91</td> <td>2.5</td> </tr> <tr> <td>3Ph CT/PT operated Smart Meter - Boundary Meter</td> <td>42,000</td> <td>152</td> <td>1</td> <td>0.0</td> </tr> <tr> <td>3Ph CT/PT operated Smart Meter feeder Meter</td> <td>42,000</td> <td>11,926</td> <td>50</td> <td>1.4</td> </tr> <tr> <td>Total</td> <td></td> <td>57,49,357</td> <td>3,560</td> <td></td> </tr> </tbody> </table> <p>It is clear that the investment is significant and the Gol financial support for smart meter is low. From Table 5, it is also clear that 94% of the cost is for single phase consumer meter. The petition does not provide any cost benefit analysis of this investment, which would have to be made by the DISCOMs, hence borne by the State or consumers. The cost for DT metering is quite low, and it is surprising why the DISCOM is not ready to take it up, without waiting for RDSS project approval. We request response to the following questions:</p>	Type of Meter	Unit Rate Rs	Qty Nos	Cost Rs Cr	% of cost	Sph whole current Smart Meter - Consumer Meter	6,000	55,50,500	3,330	94	3ph whole current smart Meter - Consumer Meter	6,000	1,27,496	76	2.1	3Ph LT -CT operated Smart Meter - Consumer Meter	6,000	19,917	12	0	3Ph LT -CT operated Smart Meter - DT Meter	23,000	39,366	91	2.5	3Ph CT/PT operated Smart Meter - Boundary Meter	42,000	152	1	0.0	3Ph CT/PT operated Smart Meter feeder Meter	42,000	11,926	50	1.4	Total		57,49,357	3,560		<p>Installation of smart meters / replacement of existing energy meters with smart meters is a measure that will bring in more efficiency in Discoms' billing and collection process. This will ultimately lead to better service delivery by Discoms and ultimately the benefit for the same will be passed on to the consumers. As smart meters installation is a country wide exercise being done basis guidelines / policy measures by Ministry of Power, Government of India, it is apt that TGDIs budget the capital expenditure that would be incurred for smart meters installation for its consumers.</p>
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	<p>a) Is the proposal for Smart metering approved by the Hon'ble TGERC? If so, what is the roll-out plan?</p> <p>b) Is the costing under Capex/ Totex? If Totex, what is the framework for cost-passthrough, prudence check and performance evaluation?</p> <p>c) Have the DISCOMs provided a cost benefit analysis of the Smart metering proposal? If so, request to share the studies.</p> <p>Page 11 of 12</p> <p>d) Has an Advanced Metering Infrastructure Service Provider (AMISP) been appointed? If so, can the contract along with the Service Level Agreement (SLAs) be shared?</p>	
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