

Southern Power Distribution Company of Telangana Ltd. (TGSPDCL)



Responses to Further Objections / Suggestions

On

Filings of Revised ARR, FPT & CSS proposals of Retail Supply Business for FY 2026-27

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1.	M. Gopal, Chief Electrical Distribution Engineer South Central Railway, Headquarters Office, Electrical Department, 4th Floor, C- Block, Rail Nilayam, Secunderabad - 500 025	2 - 9
2.	Sri. Devinder Singh Major Garrison Engineer(U), Military Engineer Services, Mudfort, Secunderabad - 500 003	10 - 13

1. Response to South Central Railways.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	<p>Inherent design of the latest Electric Locomotives with regenerative braking: Modern electric locomotives are equipped with regenerative braking systems, whereby electrical energy generated during braking is injected back into the grid, particularly during off-peak/low traction load conditions.</p>	<p>TGDISCOMs acknowledge that electric locomotives use regenerative braking systems</p>
2.	<p>Power flow at the interface shall be bi-directional: The drawal entity (RailwayTSS) is connected to the Intra-State Transmission System, and power flow at the interface shall be reversible due to regenerative braking. Thus, power flow at the TSS interface point is inherently bidirectional in nature.</p> <p>In the state of Telangana, out of the total 31 Railway Traction Substations over S.C. Railway, in 14 Railway Traction Substations, DISCOMs have installed unidirectional energy meters instead of bidirectional/ABT-compliant interface meters and at 17 Railway Traction Substations, bidirectional meters provided but they are made to function as unidirectional meters.</p>	<p>The interface metering point covers a long section of the railway traction network, extending over several kilometers. Within this section, multiple locomotives and rakes operate simultaneously. While one locomotive may generate energy during braking, other locomotives within the same traction zone are simultaneously drawing power for traction requirements.</p> <p>The regenerative energy produced during braking is first utilized within the railway system itself, including:</p> <ul style="list-style-type: none"> • Auxiliary consumption of the same locomotive (compressors, blowers, control systems, etc.). • On-board auxiliary loads of AC coaches such as HVAC systems. • Other rolling stock operating in the same electrical section drawing traction power.

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3.	<p>The issues with unidirectional meters:</p> <p>a) Energy exported (regenerative energy) from Railways to the grid is not recorded.</p> <p>b) Only import energy is measured.</p> <p>c) Net energy accounting is not carried out.</p> <p>d) No tariff or settlement mechanism is applied for exported energy.</p> <p>e) This results in complete non-recognition of legitimate energy injected into the grid.</p>	<p>It is submitted that:</p> <p>Indian Railways' 25 kV AC traction system (as adopted by Indian Railways) is generally fed from the 132 kV / 220 kV grid through a single-phase Traction Transformer connected between two phases (R-Y or Y-B) of a 3-phase system.</p> <ul style="list-style-type: none"> • Primary winding: Phase-to-Phase (Line-to-Line) • Secondary winding: 25 kV single-phase feeding OHE (Overhead Equipment) • Load type: Highly fluctuating, moving load (locomotives) <p>Thus, although the DISCOM grid is fundamentally 3-phase balanced, the traction load imposed is single-phase in nature.</p> <p>When the traction transformer primary is connected between two phases (e.g., R and Y):</p> <ul style="list-style-type: none"> • Current I_R flows from phase R into the transformer. • Current I_Y returns through phase Y. • Phase B carries no current contribution for that traction transformer. <p>In instantaneous terms:</p> <p>$I_R = -I_Y$ (for single-phase load between R and Y)</p>

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		<p>This means:</p> <ul style="list-style-type: none"> • Equal magnitude current flows in two phases. • Third phase remains unloaded (from that traction point). <p>In the conventional sense, this is not “reverse power export”, from the system perspective one phase carries current in opposite direction relative to the other, creating asymmetrical phase loading at the upstream 3-phase transformer.</p> <p>Due to the aforementioned reasons, bi-directional meter cannot be installed.</p>
4.	<p>Non-installation of ABT Meters Despite Payment made with TGTRANSCO. Railways submit that:</p> <p>a) Necessary charges for installation of ABT-compliant interface meters have already been paid to TG TRANSCO.</p> <p>b) However, ABT-compliant bidirectional meters have not been installed at 14 Railway Traction Substations interface points, instead, unidirectional meters have been provided.</p> <p>Failure to install ABT meters defeats the purpose of interface metering under Availability Based Tariff (ABT) principles and causes financial prejudice to Railways.</p>	<p>TGDISCOMs are processing the request of Railways as per Standard Operating Procedures of TGDISCOMs.</p>

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5.	<p>Non-Grant of NOC for Open Access: Railways have applied for NOC to avail power as 'drawee entity connected with intrastate transmission system' as per CERC GNA Regulations -2022 on 17.06.2025 with TGTRANSCO.</p> <p>a) NOC for Open Access has not been granted by TGTRANSCO to Railways.</p> <p>b) This is despite the regulatory framework under CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022, which mandate transparent connectivity, scheduling, and accounting principles for transmission-connected entities.</p> <p>c) Interface metering must record actual bidirectional energy flow.</p> <p>d) Denial of NOC coupled with non-installation of ABT meters results in regulatory and financial disadvantage to Railways.</p> <p>The combined effect of non grant of Open Access and absence of ABT metering affecting procurement flexibility and prevents transparent energy accounting and fair settlement.</p>	<p>TGDISCOMs are processing the request of Railways as per Standard Operating Procedures of TGDISCOMs.</p>
6.	<p>Forced Undertaking by DISCOM: In one of the Traction Substations, DISCOM has insisted that Railways furnish an undertaking stating that Railways will not claim</p>	<p>Due to the aforementioned reasons, there is no possibility of exporting energy.</p>

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	<p>compensation or credit for regenerative energy injected into the grid as a pre-condition for extending supply.</p> <p>Such insistence:</p> <p>a) Is an arbitrary and unilateral.</p> <p>b) Has no statutory backing under the Electricity Act, 2003.</p> <p>c) Defeats the principle of fair energy accounting.</p> <p>d) Discourages energy-efficient technologies like regenerative braking.</p>	
7.	<p>Regulatory Principles Involved: As per established electricity regulatory and grid operation principles:</p> <p>a) Interface metering at EHT/HT levels must be bidirectional where power flow is reversible.</p> <p>b) ABT-compliant meters are required at transmission interconnection points.</p> <p>c) Energy accounting must reflect both import and export.</p> <p>d) Suppression or non-recording of export energy is contrary to grid discipline and transparency norms.</p> <p>Interface metering must reflect actual bidirectional energy flow as per established metering and grid operation principles. Railway Traction Substations, being bulk HT/EHT consumers connected to the grid, qualify for proper interface metering, consistent with ABT principles.</p>	<p>As per CEA metering regulations section 7</p> <p>“(a) Interface Meters</p> <p>(i) Consumers who have interconnection with the Inter-State Transmission System or Intra-State Transmission System and have been permitted open access by the Appropriate Commission shall be provided with interface meters.</p> <p>(ii) For consumers connected to distribution system and permitted open access, provision of interface meters may be made as per the regulations or directions of the Appropriate Commission.</p> <p>(iii) The scheme for location of interface meters shall be submitted to the CTU or the STU or the licensee by owner of the meter in advance, before the installation of the scheme.”</p> <p>Hence, the meters installed to railway services need not be interface meters.</p>

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8.	<p>Prayer to the Hon'ble Commission:</p> <p>Railways respectfully request the Hon'ble Commission to:</p> <p>a) Direct TGTRANSCO / TGDISCOMS to immediately install ABT-compliant bidirectional interface meters at all Railway TSS and GSS locations.</p> <p>b) Ensure proper accounting of both import and export energy.</p> <p>c) Direct billing to be carried out on net energy basis.</p> <p>d) Artificial suppression of export data is contrary to grid discipline.</p> <p>e) Unaccountable regenerative energy system affects, Energy efficiency incentives and Decarbonization objectives of the nation.</p> <p>f) Non-recognition of such injection defeats national energy efficiency goals.</p> <p>g) Direct DISCOMs not to insist on any undertaking denying legitimate export claims.</p> <p>h) Issue appropriate directions regarding grant of Open Access NOC in accordance with statutory provisions.</p>	<p>TGDISCOMs have responded to all the comments by the SCR and would like to reiterate that net energy accounting is not applicable to Railway traction connections and No tariff settlement for exported units is admissible</p>
9.	<p>Conclusion</p> <ul style="list-style-type: none"> Railways are injecting regenerative energy into the State Grid without recognition due to unidirectional metering arrangements, despite payment for ABT 	<p>TGDISCOMs would like to submit that all billing, metering, and energy accounting practices are strictly in accordance with the provisions stipulated by the Regulatory Commission and the Central Electricity Authority (CEA). These regulations are uniformly applied not only to</p>

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	<p>meters and established system connectivity.</p> <ul style="list-style-type: none"> • The present situation is technically unsound, financially inequitable, and contrary to grid operation principles and regulatory intent. • The matter is therefore placed before the Hon'ble Commission for urgent regulatory intervention. <p>In view of the facts and technical submissions placed on record, the Hon'ble Commission is most respectfully prayed to admit and consider the above additional objections of the Railways in the true spirit of regulatory fairness and grid operation principles, and to grant appropriate relief by setting aside the unwarranted financial burden arising on this account.</p> <p>The Railways, being a strategic public utility with inherent technical contribution to grid stability, may kindly be extended equitable regulatory consideration.</p> <p>Submitted for the kind consideration and appropriate orders of the Hon'ble Commission.</p>	<p>Railway traction connections but to all categories of consumers without exception.</p>

Responses to Request from Military Engineering Services (MES)

1. Military Engineer Services (MES) is one of the premier organisation and is construction and maintenance agency under Ministry of Defence, Government of India, responsible for providing comprehensive infrastructure and engineering support to the Armed Forces (Army/Navy/ Airforce). This office Garrison Engineer (GE), Utility Secunderabad is entrusted with the operation, maintenance and management of essential utility services, including electricity and water supply for the entire military station of Secunderabad. The office ensures uninterrupted and efficient utility services to various defence establishments, operational units, training institutions, residential accommodations and allied defence infrastructure which are critical for sustaining operational readiness, administrative efficiency and welfare of service personnel and their families.
2. At present, the electricity supply to the Military Station Secunderabad is sourced from Telangana State Power Distribution Company Limited (TGSPDCL). The station is geographically dispersed across multiple locations and operational pockets, and to cater to the distributed load requirements, electricity is being drawn **through 51 High Tension (HT) service connections and 26 Low Tension (LT) service connections**. These service connections collectively support the diverse power requirements of operational units, administrative establishments, technical facilities and residential areas within the military station. The electricity consumption charges are duly paid to TGSPDCL on a regular monthly basis as per the applicable tariff and billing provisions.
3. It is submitted that the aforesaid service connections fall under multiple tariff categories other than the domestic category. These connections cater to a wide spectrum of defence establishments, including operational facilities, administrative offices, technical installations, training institutions, logistics units and other essential service infrastructure. The nature and pattern of **electricity consumption in these establishments are distinct from conventional commercial or industrial consumers** and are primarily aligned with operational and national security requirements.
4. In view of the foregoing, it is respectfully submitted that a **separate and distinct electricity tariff category for MES/Defence Establishments** is required to be considered by the Hon'ble Commission. The absence of a dedicated tariff category presently results in the applicability of multiple tariff classifications, frequent variations in Contracted Maximum Demand (CMD) and Recorded Maximum Demand (RMD), and the recurring levy of penalty charges, which do not accurately reflect the functional and operational realities of defence infrastructure. It is emphasised that MES and Defence Establishments are neither commercial nor profit-oriented entities; rather, they operate solely in furtherance of national security, operational preparedness and welfare of Armed Forces personnel.
5. The necessity for creation of separate tariff category for MES/Defence establishments merits consideration due to several unique functional and operational factors, as enumerated below:-

5.1 Regular movement of Troops.

The strength of Defence Establishments is inherently dynamic due to regular induction and de-induction of troops on account of operational deployments, field postings, training exercises and administrative rotations. Consequently, the electricity load pattern

remains variable and unpredictable, with no stable or uniform demand profile throughout the year. Such unavoidable fluctuations frequently result in variations between Contracted Maximum Demand (CMD) and Recorded Maximum Demand (RMD), leading to recurring penalty charges under the existing tariff framework. Since these variations arise from operational necessities rather than commercial considerations, creation of a separate tariff category would help in rationalisation of tariff provisions, minimise avoidable penalty burdens and contribute to prudent utilisation of Government funds, thereby safeguarding the public exchequer.

5.2 Trial/ Procurement of New Tech Equipments.

Defence Establishments are subject to continuous modernisation and capability enhancement, including upgradation of existing systems, induction of technologically advanced equipment and periodic field trials of new platforms and infrastructure. Such activities often result in temporary or sustained variations in electricity demand, directly impacting Contracted Maximum Demand (CMD) and Recorded Maximum Demand (RMD). Under the prevailing tariff structure, these operationally driven demand fluctuations attract penalty charges, despite being integral to national defence preparedness. A separate tariff category would appropriately account for such modernization linked load variations and prevent undue financial burden arising from penalties that are beyond the routine control of the establishment.

5.3 Undue Tarrif for Soldiers Accommodations.

Other Than Married (OTM) accommodation constitutes residential living facilities for soldiers who are unmarried or serving away from their families. These premises are purely residential in nature and are used solely for dwelling purposes without any commercial activity being undertaken therein. However, at present, such OTM accommodations are being categorised under commercial tariff instead of domestic tariff, resulting in higher tariff application and associated financial burden. This classification does not reflect the true character and usage of these premises. Rationalisation through creation of a separate tariff category for Defence Establishments would address such anomalies, ensure appropriate tariff application, and eliminate the imposition of unsuitable commercial rates on non-commercial residential accommodation.

5.4 Multiple tariff categories for various infrastructures.

Various infrastructure assets within Defence Establishments, including administrative offices, training facilities, logistics installations, technical workshops and welfare institutions, operate strictly on a non-profit and non-commercial basis in furtherance of national service. Despite this, such infrastructure is presently classified under multiple tariff categories, including commercial classifications, which do not accurately reflect their functional character. This results in an avoidable financial burden on Government funds. Creation of a separate tariff category for MES/Defence Establishments would provide appropriate recognition to the unique status of defence infrastructure and ensure a fair, rational, and equitable tariff framework, thereby preventing unnecessary strain on the Government exchequer.

5.5 Varied load pattern due to operational preparedness.

Defence establishments are mandated to maintain a high state of operational readiness at all times to respond effectively to contingencies, natural disasters, internal security situations and national emergencies. During such exigencies, there may be sudden and substantial surges in electricity consumption arising from activation of additional facilities, emergency operations centres, communication systems, medical installations, logistics nodes, and enhanced security infrastructure. These unforeseen yet mission-critical increases in load are not driven by commercial expansion but by national security imperatives and humanitarian assistance requirements. Under the existing tariff framework, such surge demands often attract higher demand charges and penalties linked to CMD/RMD variations. A dedicated tariff category would suitably account for such operational contingencies, ensuring that defence preparedness is not financially penalised under commercial tariff constructs.

5.6 Long Term Infrastructure Planning.

Grant of a separate tariff recognition for MES/Defence Establishments would significantly enhance long-term infrastructure planning, financial forecasting and prudent budgeting of defence utility services. A stable and clearly defined tariff framework would enable accurate estimation of recurring electricity expenditure, facilitating more realistic budget allocations and efficient utilisation of public funds. It would also assist in structured load planning, phased infrastructure upgrades, and optimisation of demand management strategies without the uncertainty of fluctuating tariff classifications or penalty liabilities. Such predictability in tariff application would promote financial discipline, transparency and better coordination between Defence authorities and TGSPDCL thereby ensuring sustainable management of defence utility infrastructure in alignment with national priorities.

5.7 Non Commercial Welfare Infrastructures.

Defence Establishments also maintain and operate a wide spectrum of welfare infrastructure, including schools, hospitals, community facilities and residential accommodation for service personnel and their families. These institutions perform essential public service and welfare functions, contributing not only to the well-being of Armed Forces personnel. The electricity consumption in such facilities is fundamentally service oriented and welfare driven, without any commercial or profit motive. However, classification under varied tariff categories often results in application of rates that do not correspond with their social and institutional character. A separate tariff category would ensure that such welfare infrastructure is accorded appropriate recognition and is charged on a rational and equitable basis consistent with its public service role.

Response of TGDISCOMs:

TGDISCOMs acknowledge the critical national security role of Defence/MES establishments and appreciate the operational context outlined in the request. TGDISCOMs would like to clarify that Tariff categorization, including creation of any new category, lies within the **exclusive jurisdiction of the Hon'ble Commission**. TGSPDCL's role is to implement approved tariffs, place facts on record, and submit workable solutions within the present regulatory framework.

TGDISCOMs are currently providing optimal tariff possible to the defence establishments following cost reflective approach. Pending any new category notified by the Commission, TGSPDCL is obliged to continue billing MES service connections under the **prevailing HT/LT categories** based on the **nature of usage, voltage level, CMD, and applicable tariff orders**.

Furthermore, TGDISCOMs will remain fully bound by any directives issued by the Hon'ble Commission regarding the creation of a separate tariff category and shall comply with such directions from the Commission.

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3	HYDERABAD METROPOLITAN WATER SUPPLY & SEWERAGE BOARD Admn. Building, Khairatabad, Hyderabad-500 004.	6 - 7

3. Response to Indian Oil Corporation Limited (IOCL), Hyderabad Terminal

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1.	<p>With reference to Letter No. CE(IPC & RAC)/SE/DE(RAC)/ADE-III/F.No.A-124/D.NO.4801 /25 dated 16.02.2026, it has been communicated by TGSPDCL that:</p> <p>a)The request for re-categorization to HT-I (Industrial) is not supported by the nature of operations carried out at IOCL Hyderabad Terminal; and</p> <p>b)The activities undertaken at the terminal are merely simple mixing of petroleum products and biofuels without any manufacturing or processing operations, and that blending is carried out only through transfer into existing tanks without the use of industrial processing equipment.</p> <p>IOCL respectfully submits that the above observations are not in consonance with the actual operations at the Hyderabad Terminal.</p> <p>A manufacturing/processing activity is defined as a set of physical, chemical, or mechanical operations that transform raw materials or intermediate goods into finished products by altering their properties, composition or characteristics using machinery, power, and labour.</p> <p>At IOCL Hyderabad Terminal:</p> <ul style="list-style-type: none"> •Blending of petroleum products and biofuels results in change in chemical properties, which constitutes 	<p>As already stated in our earlier submissions, TGSPDCL reiterates that it has submitted its report to the Hon'ble Commission based on the inspection conducted at the IOCL Hyderabad Terminal (Service No. HBG594). The inspection established that the electricity at the premises is being used primarily for storage, unloading, pumping, transfer, and simple mixing of petroleum products and bio-fuels. No manufacturing or processing activity is carried out at the terminal, as the blending of petrol (80%) and ethanol (20%) is performed merely through transfer into existing tanks without the use of any industrial processing equipment.</p> <p>The Vapour Recovery Units (VRU) and other equipment cited by IOCL are standard safety and environmental compliance systems mandated by CPCB for specific, high-volume retail petroleum outlets and storage terminals to control volatile organic compound emissions and do not constitute industrial processing equipment.</p> <p>The overall functioning of the terminal remains commercial in nature, consistent with logistical and distribution activities covered under HT-II(A) Others.</p> <p>Possession of a Factory License also does not establish industrial</p>

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	<p>processing and cannot be construed as simple mixing.</p> <ul style="list-style-type: none"> •The terminal is equipped with a Vapour Recovery Unit (VRU) that recovers petroleum vapours and converts them into liquid form through an industrial process. •Biodiesel blending operations require circulation to ensure uniform blending and compliance with prescribed chemical specifications of the finished product. <p>As per Clause 2.2 of the Tariff Order, the HT-I Industrial Category is applicable where electricity is used for manufacturing, processing, or preservation of goods.</p> <p>In view of the above operational processes and recovery systems involving industrial processing equipment, IOCL Hyderabad Terminal is effectively engaged in processing activities of blended petroleum products.</p> <p>It is further submitted that other IOCL terminals in the State of Andhra Pradesh performing identical industrial operations-such as Rajahmundry, Kakinada, Guntakal, and Chittoor-are categorized under the HT-Industrial tariff category, and copies of the relevant electricity bills have already been furnished for kind reference.</p> <p>IOCL Hyderabad Terminal presently holds HT Service Connection No. HBG594, categorized under HT-II (A) - Commercial.</p> <p>The said connection is utilized for Ethanol Blended Motor Spirit (EBMS) ,B7 High-Speed Diesel (HSD) and its</p>	<p>activity, as such licenses are often required for safety, health, and environmental reasons.</p> <p>Accordingly, TGSPDCL submits that the existing categorization under HT II(A): Others is appropriate.</p>

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	<p>associated activities.</p> <p>Further, the establishment is covered under the Factories Act, and a valid Factory License has already been submitted to the Hon'ble Commission.</p> <p>In connection with the Public Hearing scheduled on 07.03.2026 in O.P. No.80 of 2025 regarding approval of Revised ARR, FPT, and C SS for FY 2026-27, IOCL most respectfully requests the Hon'ble Commission to:</p> <p>Consider our earlier representations along with the present submission during the public hearing; and Re-categorize the HT connection of IOCL Hyderabad Terminal from HT-II (A) (Commercial) to HT-I (A) (Industrial) and revise the applicable tariff accordingly.</p> <p>Request for Re-categorization: _</p> <table border="1" data-bbox="315 1050 1005 1377"> <thead> <tr> <th data-bbox="315 1050 506 1134">Location Address</th> <th data-bbox="506 1050 618 1134">HT Service Connection</th> <th data-bbox="618 1050 763 1134">Existing Tariff Category</th> <th data-bbox="763 1050 875 1134">New Tariff Category Request</th> <th data-bbox="875 1050 1005 1134">Reasons</th> </tr> </thead> <tbody> <tr> <td data-bbox="315 1134 506 1377">Indian Oil Corporation Limited Hyderabad Terminal Survey No. 183, IDA Phase-III, Cherlapalli, Hyderabad - 500051</td> <td data-bbox="506 1134 618 1377">HBG594</td> <td data-bbox="618 1134 763 1377">HT-II (A): Commercial</td> <td data-bbox="763 1134 875 1377">HT-I (A): Industry General</td> <td data-bbox="875 1134 1005 1377">Blending process Operations</td> </tr> </tbody> </table>	Location Address	HT Service Connection	Existing Tariff Category	New Tariff Category Request	Reasons	Indian Oil Corporation Limited Hyderabad Terminal Survey No. 183, IDA Phase-III, Cherlapalli, Hyderabad - 500051	HBG594	HT-II (A): Commercial	HT-I (A): Industry General	Blending process Operations	
Location Address	HT Service Connection	Existing Tariff Category	New Tariff Category Request	Reasons								
Indian Oil Corporation Limited Hyderabad Terminal Survey No. 183, IDA Phase-III, Cherlapalli, Hyderabad - 500051	HBG594	HT-II (A): Commercial	HT-I (A): Industry General	Blending process Operations								

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	In view of the above, we respectfully request the Hon'ble Commission to re-categorize the HT connection from HT-II (A) - Commercial to HT-I (A) - Industry General while finalizing the retail tariff proposal of TGSPDCL.	

Response to The Warangal Granite Factory Owner's Association, H.No.1-1-850, Siddhartha Nagar, Kazipet, Hanumakonda, Telangana State Regd. No. 621/2010.

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1.	<p>On behalf of the Warangal Granite Factory Owners' Association, we respectfully submit this representation requesting the Honorable Commission to kindly consider enhancement of the HT-1 Optional Category limit from 150 kVA to 225 kVA. Such a measure will significantly support the MSME granite sector and help sustain industrial activity in the region.</p> <p>At present, the granite industry is facing severe competition from alternative surface materials such as vitrified tiles, composite stones, and other engineered products. Due to rising production costs and market pressures, many units are becoming financially stressed, while several others are on the verge of closure. Without timely policy support and incentive-based relief, the survival of this traditional employment-generating industry will become increasingly difficult.</p> <p>Extension of the HT-1 Optional Category up to 225 kVA will:</p>	<p>TGDISCOMs respectfully submit that the demand charges for the HT-1 Optional Category are Rs. 100/kVA/month, as against Rs. 500/kVA/month applicable to the HT Industrial Category. This results in an under-recovery for TGDISCOMs for this specific consumer group.</p> <p>The HT-1 Optional Category was specifically created to avoid placing undue financial burden on small industrial consumers with low production levels. Accordingly, the sanctioned load under this category is capped at 150 kVA. Any consumer requiring more than 150 kVA must, as per the Tariff Order, shall shift to the HT Industrial Category, which is designed for higher-demand industrial operations.</p>

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	<ul style="list-style-type: none"> • Provide essential cost relief to small and medium granite units. • Encourage modernization through adoption of sophisticated and energy-efficient machinery. • Enable the industry to compete with emerging substitute materials. • Protect direct and indirect employment dependent on the granite sector across Telangana. <p>We further request the Honorable Commission to kindly examine the present market condition and downturn in the granite sector through the District Industries Centre and the Ministry of Micro, Small and Medium Enterprises, Government of India, so that appropriate supportive measures may be extended.</p> <p>The livelihood of thousands of families depends on this industry, and timely intervention from the Commission will help revive confidence among entrepreneurs and ensure continued industrial growth.</p> <p>We therefore humbly request the Honorable Commission to kindly consider our representation favorably and take necessary action in the interest of the granite MSME sector.</p>	<p>Any enhancement of the demand limit from 150 kVA to 225 kVA would result in revenue implications and may increase the cross-subsidy burden on other consumer categories unless compensated through tariff restructuring or additional subsidy support.</p> <p>Increasing the HT-1 Optional load limit to 225 kVA for any particular sector would distort the approved tariff design and undermine the very purpose for which the optional category was established.</p> <p>In view of the above, TGDISCOMs submit that the request for enhancement of the sanctioned load limit to 225 kVA cannot be considered. Consumers requiring a higher load shall continue to be classified under the HT Industrial Category as per the existing practice.</p>

Response to Hyderabad Metropolitan Water Supply & Sewerage Board, Admin building, Khairtabad, Hyderabad 500004.

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1.	<p>(i) Sanction:HMWSSB requests the Hon'ble TSERC to continue to sanction concessional Power Tariff at the rate of Rs. 4.95 paise per kVAH for the FY 2025-26 onwards on perpetual basis.</p> <p>(ii) Special Category: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.</p> <p>(iii) The facility of concessional Power Tariff may also be extended to: (a) Pump House (b) all STP stations, and (c) all Office Buildings.</p> <p>(iv) Subvention:Since financial year 2022-23, TG Govt has sanctioned subvention amounts to HMWSSB payable to TS DISCOMs. In line with TSERC orders, TSSPDCL have raised power bills for HMWSSB as per Cat-I(E) (Normal) instead of Cat-V(B) (Concessional), due to non-release of subvention amount by the State Government.</p> <p>The Hon'ble TSERC'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</p>	<p>The Hon'ble Commission, in its Order dated 22.10.2022 Order in I.A.No.54 of 2022 in OP 58 & 59 of 2021 22102022.pdf has expressly held that "Therefore, there shall be no further determination or decision or creation of a separate category of tariff for HMWSSB for FY 2022-23 except extending the applicability of the tariff determined for HMRL for FY 2022-23 to HMWSSB and such extension and applicability of the tariff is subject to the subvention commitment being agreed to and extended from time to time by the Government."</p> <p>Further, any concessional tariff can be considered only upon a firm subvention commitment from the Government of Telangana.</p> <p>Due to non-release of the sanctioned subvention amount by the State Government, the differential revenue corresponding to the concessional tariff has not been realized by TGDISCOMs.</p> <p>In view of the above and in compliance with TSERC tariff orders, Telangana Southern Power Distribution Company Limited (TGSPDCL) has been raising power bills to HMWSSB under Normal tariff instead of Category-V(B) (Concessional), so as to avoid revenue shortfall and</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	<p>future period and compensate DISCOMs suitably.</p> <p>(v) Time of Day: Earlier TOD tariff provided rebate of ₹1.50/unit for power consumption during off-peak hours (10 PM to 6 AM). The same has been removed in the present tariff, increasing power cost for HMWSSB. As HMWSSB performs essential public water supply operations mainly during night hours, it is requested to kindly restore / provide suitable off-peak TOD concession for HMWSSB.</p> <p>(vi) HMWSSB has already requested vide letter dt. 01.01.2026 the GoTS for issue of Comfort Letter by Energy Department as restoration of concessional power tariff is critically dependent on provision of subvention budget of Rs. 300 Cr per annum and issuance of Letter of Comfort by the Energy Department, Govt of Telangana.</p>	<p>financial strain on the utility.</p> <p>TGDISCOMs submit that the concessional tariff under Category-V(B) can be extended prospectively upon receipt of the eligible subvention amount from the State Government, along with necessary budgetary support, in accordance with the statutory provisions and TSERC orders.</p> <p>With regard to the TOD tariffs, the earlier off-peak incentive has not been retained as the cost of procurement during night hours is relatively higher.</p> <p>The revised TOD tariffs have been proposed after assessing its financial and operational impact and is intended to better align consumption patterns with power availability, while supporting grid and cost efficiency.</p> <p>In view of the above, TGDISCOMs submit that the existing tariffs may be continued for the category.</p>