

AM

BEFORE THE TELANGANA STATE ELECTRICITY REGULATORY COMMISSION

In the matter of:

Viom Networks Limited,
4th Floor, Gowra Plaza”
Door No. 1-8-304-307/381/444,
Sardar Patel Road, Begumpet,
Secunderabad 500003



....Petitioner

And

1. Southern Power Distribution Company of T.S. Ltd (TSSPDCL)
Mint Compound, Hyderabad.
2. Northern Power Distribution Company of T.S. Ltd (TSPDCL)
Vidyut Bhavan, Nakalgutta,
Hanumakonda – 506001.

.... Respondents

Dear Sir

The objections respectfully submit as under:-

Viom Networks Limited (“Viom”) is a Telecom Infrastructure Company, registered with Department of Telecommunications, Ministry of Communication & IT, Government of India. We owned and operate 42,000 telecommunication towers across India and are present in all the 22 telecom circles in India and render passive telecom infrastructure services to all major telecom service providers.

The telecom sector has played a major role in revolutionizing the means of communications and telecommunication towers are the only system involved in providing last mile telecom connectivity to people. In Telangana , we own and operate 1555 telecommunication towers (“towers”) across entire state in rural far flung areas and urban area. To operate a tower, 24X7 hours power supply is required and thus making Viom and other such companies operating telecommunication towers dependent on the Electricity Distribution companies. Further, the telecommunication services are designated as “essential services” and hence, continuous electricity supply and at a uniform load are essential to allow operation of tower and consequently the telecom services. Thus, any deficient supply of electricity by the electricity distribution companies may cripple the entire telecom services in a state or may necessitate the tower companies to press in alternative and expensive source of powers i.e., battery and DG sets.

The objector obtains the electricity supply through LT power connections from the Electricity Distribution or Supply Companies and under the current classification of consumers; we are categorized under LT II B i.e., Non Domestic Category or Commercial category and our average consumption load is 10 to 12 KW. The objector files the following objections and suggestions. We request to provide us an opportunity of hearing during the course of Public Hearing.

NO OF SERVICES: 1555

Capacitor Surcharge: In the previous orders issued by the Hon’ble commission LT Consumers with KWH based billing (except LT Domestic, LT – IV, LT-VI (A), LT – VII (B)) having connected loads mentioned in the table below shall pay capacitor surcharge (as per rules in vogue) at the rate of 25% of the billed amount, if capacitors are found defunct.

Category	Contracted Load
LT II & LT VII (A)	< 10 KW
LT III & LT VI (B)	< 20 HP

> We want to know how the capacitor surcharges are assessed as 25% of the bill amount for direct ceiling.

For VIOM NETWORKS LIMITED

- If there is no inductive load at the consumer end and having good PF then installing additional capacitor leads to lead PF and it impacts the electronic equipment.
- So we request the commission to levy the penalty in slab manner Like ≥ 0.95 No penalty, 0.90 to 0.95 - 5% on Energy Charges, 0.85 to 0.90 - 10% on Energy Charges, 0.8 to 0.85 - 15% on Energy Charges, < 0.8 - 20% on Energy Charges

Tariff Hike:

Please find the below table for comparison of Commercial Unit Rate with the surrounding states (Telangana, Andhra Pradesh, Karnataka and Tamilnadu).

L.T. CATEGORY- II(B) - NON-DOMESTIC AND COMMERCIAL								
Units Slab	Energy Charges Rs / Unit for FY'15-16				Energy Charges Rs / Unit for FY'16-17 (Proposed)			
	TS	AP	KTK	TN	TS	AP	KTK	TN
First 50	6.60	6.63	6.95	5.00	7.26	6.90	7.97	No hike proposed so far
51 - 100	7.80	7.38	7.95	8.05	8.58	7.68	8.97	
101 - 300	8.60	8.54	7.95	8.05	9.46	8.88	8.97	
301 - 500	9.10	9.06	7.95	8.05	10.01	9.42	8.97	
Above 500	9.70	9.59	7.95	8.05	10.67	9.97	8.97	
Energy Charges for 1000 units	9110	9016	7900	7898	10021	9374	8920	7898
Avg Unit Rate	9.1	9.0	7.9	7.9	10.0	9.4	8.9	7.9

As mentioned above Telangana State Tariff is higher than all surrounding States.

So in view of above we are requesting the Hon'ble commission not to enhance the LT II (B) Non Domestic / Commercial Tariff for FY'16-17.

KVAH billing: It is observed that there is no consistency in billing pattern by DISCOMS (KWH/KVAH). They are continuously changing billing pattern since last few months charging on KWH and few months on KVAH for the same services. Due to this inconsistency in billing pattern the billed units are overlapped at some services.

It is also requested to the commission that the DISCOMS are not supplying quality power and not purchasing power on KVAH. Hence it is requested to review the clause (billing on KVAH) and amend the same by mutual consent in which both the Consumer and DISCOMS will not effect.

Consumer Complaints and Tracking: Discoms are failing to address the consumer complaints (especially billing related) within the timelines and also at many times they are not even ready to take the complaint at EROs and consumer cells.


We further bring to your notice that prior to addressing the complaint the DISCOM people are forcing us to first pay the abnormal bill amount and if not paid as per their demand they are disconnecting the power supply without any prior intimation. Because of this practice the telecom services which are treated as essential services are badly effected causing lot of inconvenience to the common public.

Hence it is requested to the Hon'ble Commission to direct the DISCOMS to maintain 24 X 7 online complaint center with an end to end tracking.

Online Bill facility: DISCOMS are failing to facilitate online bill with full details (like KWH, KVAH, Energy charges, Other charges, Arrears, Total etc..), so it is requested to make sure the complete bill information available in DISCOM portal.

Thanking You,

For Viom Networks Limited

FOR VIOM NETWORKS LIMITED

 Authorized Signatory

Summary Table

Name & Full Address of the Objector	Brief details of Objection(s)/ Suggestions	Objections against Tariff Proposals and Cross subsidy Surcharge Proposals of TSSPDCL	Whether copy of objection & proof of delivery at Licensee's Office enclosed (Yes/No)	Whether objector wants to be heard in person (Yes/No)
A.R. Subba Rao / M. Lalitha Devi Viom Networks Ltd 4 th Floor, Gowra Plaza" at Door No. 1-8-304- 307/381/444, Sardar Patel Road, Begumpet, Secunderabad 500003	<ol style="list-style-type: none"> 1. Capacitor Surcharge 2. Tariff Hike 3. KVAH billing 4. Consumer Complaints and Tracking 5. Online Bill facility 	Tariff Proposal	Yes	Yes

FOR VIOM NETWORKS LIMITED

Authorised Signatory

copy to Security T&RC

