

SOUTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED



RESPONSES TO OBJECTIONS / SUGGESTIONS

On

ARR & Tariff Filings Proposals of Retail Supply Business for FY 2017-18

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1.	M.Venugopala Rao, Senior Journalist & Convener, Centre for Power Studies, H.No. 7-1-408 to 413, F 203, Sri Sai Darsan Residency, Balkampet Road, Ameerpet , Hyd- 500016.	4
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4.	S.Ram Reddy, President, Credai Hyderabad, II floor, SMR House, Plot No. 73, Nagarjuna Hills, Panjagutta, Hyderabad-500082. Email : srr.smrgroup@gmail.com. Tel: 040-66772288	10
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S.No.	Summary of Objections / Suggestions	Response of the Licensee
<p>1. M.Venugopala Rao, Senior Journalist & Convener, Centre for Power Studies, H.No. 7-1-408 to 413, F 203, Sri Sai Darsan Residency, Balkampet Road, Ameerpet , Hyd- 500016.</p>		
i.	<p>Neither in the ARR filings dated 30.11.2016, nor in the supplementary filings on tariff, etc., filed on 13th April, 2017, both the TS Discoms have incorporated the crucial information required for filing objections and suggestions on their proposals and required for the regulatory process of the Hon'ble Commission. This is despite the fact that there has been inordinate delay in filing the tariff proposals by more than four months. The incomplete filings will further delay the regulatory process- from filing suggestions and objections by interested public, replies to the same by the Discoms and the Hon'ble Commission holding public hearings and issuing tariff order for the year 2017-18. Though the Discoms have requested the Hon'ble Commission to retain the tariffs as per the tariff order of 2016-17 for the year 2017-18, to meet the requirements of regulatory process of the Commission, they have to file necessary information and data.</p>	<p>TS Discoms have submitted all the required information to the Honble Commission for determining the ARR of the Discoms. Further, TS Discoms have submitted additional information on ARR filings for FY 2017-18 as directed by the Hon'ble Commission and the same is available in the website of TS Discoms.</p>
ii.	<p>In the above filings, TSSPDCL has shown revenue requirement of Rs.22044.56 crore with revenue at current tariff (i.e. tariff of 2016-17) of Rs.15010.38 crore with a revenue gap of Rs.7034.18 crore for the year 2017-18. Similarly, TSNPDCL has shown revenue requirement of Rs.9885.89 crore, without giving details of revenue at current tariff and revenue gap. Nor have the Discoms explained how much subsidy they are expecting from the Government, what would be the non-tariff income and how do they propose to bridge the revenue gap, if any, after adjusting the subsidy the Government agrees to provide.</p>	<p>The revenue at current tariff of Rs.15010.38 crore shown in the filings of TSSPDCL pertains to FY2015-16. Discoms have proposed to retain the existing tariffs as per the Tariff Order of FY 2016-17 for the ensuing year FY 2017-18 also as the GoTS has assured to provide the required support to bridge the gap if any.</p>

iii.	<p>While proposing changes to the definition of the consumer category to bring in what they have termed “greater clarity,” the Discoms have not submitted details of financial impact on their revenues for 2017-18 due to such re-categorisation of consumers. Since such-re-categorisation inevitably leads to change in tariffs applicable to re-categorised consumers, it will have financial impact on revenue of the Discoms.</p>	<p>There is no significant financial impact on revenue of the Discoms due to the proposed changes in the definition of the consumer categories.</p>
iv.	<p>There is no justification in the Discoms not filing the above-explained information and data and other vital information like the amount of fixed charges to be paid for backing down in view of the projected huge surplus power. It is widely reported that the Hon’ble Chief Minister of GoTS, Sri K Chandrasekhar Rao, did not want any tariff hike for the year 2017-18. If such is the case, it is for the Government to provide subsidy required to bridge the revenue gap to be determined by the Hon’ble Commission fully. If the Government does not provide required subsidy fully, the Discoms will be in financial difficulties.</p>	<p>The details of station wise fixed costs of each generating station and the energy dispatch based on merit order for every month have been included in the Discom Filings. Further, any fixed capacity getting stranded due to open access availed by the consumers is being evaluated and the Discom proposes to recover such fixed costs in the form of additional surcharge from open access consumers which will be filed separately as stated in Tariff filings.</p>

v.	<p>When revenue requirement and revenue gap of the Discoms for the year 2017-18 have to be determined by the Hon'ble Commission, it is for the Discoms to explain how they propose to bridge the revenue gap, if any, that remains even after adjusting the subsidy to be provided by the Government in the background of their seeking retention of tariff of 2016-17 for 2017-18. The Discoms should not be allowed not to explain how they propose to bridge the balance revenue gap, if any. Since such revenue gap is to be determined before issuance of the tariff order for 2017-18 by the Hon'ble Commission, the Discoms are not entitled to claim such revenue gap as regulatory asset or under true up later. True up claims pertain only to variations in revenue and expenditure that may arise due to various factors which cannot be foreseen at the time of issuance of tariff order. The Hon'ble Commission has to make this position clear to the Discoms, if the latter do not explain how they propose to bridge the balance revenue gap, if any, and agree not to claim such revenue gap under true up later.</p>	<p>The Licensee has filed ARR and Tariff proposals for FY2017-18 before the Hon'ble commission and submitted additional information as per the directions of Hon'ble commission. The Honble Commission considering the Discom proposals and the views of the stakeholders during public hearing will determine the tariffs and requirement of government subsidy to bridge the revenue gap if any. The True-up claims for 2017-18 will be made by the Discoms as per the Regulation 4 of 2005 read with amendment Regulation 1 of 2014.</p>
vi.	<p>If the Discoms do not explain how they propose to bridge the balance revenue gap, if any, and if tariff order is issued without determining the ways of bridging such revenue gap, and without making it clear that such balance revenue gap will not be allowed to be claimed as true up later by the Discoms, the threat of revenue gap getting accumulated will arise.</p>	

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2. The Chief Engineer, Commercial, APGENCO, Vidyut Soudha, Hyderabad-82																																										
(i)	<p>Hon'ble APERC has determined the tariff of APGENCO for Control Period 2014-19. Hon'ble TSERC has provided the amounts ordered by APERC against APGENCO stations in the Tariff year 2016-17 except Pension commitments in Retail Supply Tariff Order of TSDiscoms. APGENCO provided the ARR details for APGENCO Stations to CE/Plg., Comml&Coord/TSTRANSCO duly including the commitments relating to earlier years. The following amounts are to be included in the Retail Supply Tariff Order for 2017-18 in addition to the commitments of 2017-18.</p> <table border="1" data-bbox="317 646 1204 1182"> <thead> <tr> <th>Year</th> <th>As per APERC Order</th> <th>Admitted</th> <th>Balance</th> </tr> </thead> <tbody> <tr> <td colspan="4">Fixed Cost</td> </tr> <tr> <td>2014-15</td> <td>1005.4012</td> <td>871.92</td> <td>133.48</td> </tr> <tr> <td>2015-16</td> <td>1154.78</td> <td>1005.25</td> <td>149.53</td> </tr> <tr> <td>2016-17(Upto Sep)</td> <td>1733.52</td> <td>1733.52</td> <td>0</td> </tr> <tr> <td colspan="4">Interest on pension Bonds</td> </tr> <tr> <td>2014-15</td> <td>263.72</td> <td>0</td> <td>263.72</td> </tr> <tr> <td>2015-16</td> <td>321.10</td> <td>0</td> <td>321.10</td> </tr> <tr> <td>2016-17</td> <td>363.52</td> <td>0</td> <td>363.52</td> </tr> <tr> <td colspan="3">Total Due:</td> <td>1231.35</td> </tr> </tbody> </table> <p>Hence it is requested to incorporate the above commitments of Rs. 1231.35 Crs in the TSDiscoms Retail Supply Tariff Order for 2017-18 in addition to the commitments of 2017-18.</p>	Year	As per APERC Order	Admitted	Balance	Fixed Cost				2014-15	1005.4012	871.92	133.48	2015-16	1154.78	1005.25	149.53	2016-17(Upto Sep)	1733.52	1733.52	0	Interest on pension Bonds				2014-15	263.72	0	263.72	2015-16	321.10	0	321.10	2016-17	363.52	0	363.52	Total Due:			1231.35	<p>It is submit that the, Hon'ble TSERC considered the MYT order issued by Hon'ble APERC and provided the Fixed cost of APGENCO stations for the year 2016-17. In view of the orders given by TSERC & APERC on the fixed cost, TSERC is requested to clarify on the admissibility of fixed charges for the FY 2014-15 & 15-16 as claimed by APGENCO.</p> <p>As per APERC retail supply Tariff order page no.182-185 pension liabilities amount provided for Rs.710 Crs for FY2016-17 and the same is divided between two Discoms i.e. APEPDCL Rs. 243.58 Crs and APSPDCL Rs. 467.18 Crs. Further, as per TSERC Tariff order page no. 154-156 pension liabilities of TSGENCO amount provided for Rs.322Crs and the same is divided between two Discoms i.e TSNPDCL Rs.95Crs and TSSPDCL Rs. 228Crs.</p> <p>Contrary to the above APGENCO claimed Rs.710 Crs of additional interest on pension bonds for FY 2016-17 on APDiscoms and TSDiscoms.Where as the TSGENCO claimed the pension liabilities amount provided in the TSERC retail supply T.O.2016-17 on TSDiscoms only as per Tariff Order. Further the clarification given by the APERC in this respect further complicated by quoting the following :</p> <p><i>"The Commission, in the Tariff Order of APGENCO dt.26.03.16 for the control period FY 2014-19, clearly stated that APGENCO is entitled to recover the tariff (which includes interest on pension bonds) from the respondents i.e. the Discoms of both AP and Telangana in proportion to the power supplied to them.</i></p> <p><i>Commission allowed a provisional amount of Rs.710Crs in the Retail supply Tariff Order for FY2016-17 towards additional interest on pension bonds of both TSGenco and APGenco. The Provisional amount thus allowed is, however is subject to adjustments at the time of trueup based on the actual figures.</i></p> <p><i>Clarification is hereby given that the additional interest amount provided by APERC in the Retail Supply Tariff Order for FY2016-17 is towards additional interest on pension bonds of both TSGenco and APGenco put</i></p>
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		<p><i>together.”</i></p> <p>From the above facts, it may concluded or interpreted from the APERC order that the amount provided is for both APGENCO and TSGENCO and the same is to be recovered from APDiscoms and TSDiscoms. In that case APGENCO is not supposed to claim the entire amount of Rs. 710.76Cr on APDiscoms and TSDiscoms. APGENCO supposed to claim their share in Rs.710.76Cr for the FY2016-17 on both the AP & TS Discoms.</p> <p>If APGENCO claims interest on pension bonds from all the Discoms of AP & TS, then TSGENCO has also to be claimed on 4 Discoms of AP &TS.</p> <p>In view of foregoing facts, it is requested to the Hon’ble TSERC</p> <ul style="list-style-type: none">a) To provide additional interest on pension bonds of APGENCO<li style="text-align: center;">(or)b) To consider the additional interest on pension bonds of respective state Genco’s by respective state Discom only, without counter claim of interest on pension bonds on other state Discoms.
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3.	WaterHealth India Private Limited, #9-7, Survey No. 308/1, Nagaram, Keesara Mandal, Hyderabad Urban – 500083, Telangana, India. Tel: +914067011709, Fax: +914067011710	
	<p>WHIN is a company engaged in the activity of constructing and operating Community Water Systems (CWSs) also known as Water Health Centres (WHCs) which provide safe and portable drinking water to underserved communities using six stage purification process including UV and RO technologies to treat raw water.</p> <p>WHIN executes CWS agreements with Panchayats and Municipalities (Local Bodies).</p> <p>The activity undertaken by WaterHealth India Private Limited (WHIN) on behalf of the Gram Panchayats is the nature of PWS and therefore requested the authority to kindly re-categorize the service connections at various WHCs in the state being operated by WHIN which are presently under LT-II Category to LT-VI B in the interest of the health and welfare of the communities.</p>	<p>The activity undertaken by WHIN is purification of drinking water using Reverse Osmosis (RO) process under certain agreement with respective local bodies. Hence, the activity is found to be similar to that of drinking water filtering plants using only RO process (i.e. RO water plants) which are categorized under LT-III Industry as per Tariff Order 2016-17. Therefore, the services of WHIN are being categorized under LT-III Industry.</p>

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4.	<p>S.Ram Reddy, President, Credai Hyderabad, II floor, SMR House, Plot No. 73, Nagarjuna Hills, Panjagutta, Hyderabad- 500082. Email : srr.smrgroup@gmail.com. Tel: 040-66772288</p>	<p>Response of the Licensee</p>
	<p>“We noticed from the provisions extracted in the Tariff order for the year FY 2010-11 that this stipulation of providing temporary connection is inserted, but a subtle distinction is made about the type of consumers and nature of use. The temporary connection has to be given on the request of consumer only in any of the existing categories that is HT-I to HT-VI but not at the discretion of the licensee, as the tariff is determined by the Commission. The Construction activity connection cannot be said as a temporary connection and nowhere it is defined in the Tariff Order.”</p> <p>It is for this reason,we request Hon’ble Commission to correct erroneous treatment of the construction activity as Temporary Activity, and request to consider LT-III Industry category for those seeking LT Connection and HT-I or HT-II category for those seeking HT connection, since, the Real Estate Sector closely relateds to Industry.</p>	<p>As per the definition stated in the Tariff Order 2016-17,Industry category is applicable for “Industrial purpose shall mean, supply for purpose of manufacturing, processing and/or preserving goods for sale, but shall not include shops, business houses, offices, public buildings, hospitals, hotels, hostels, choultries, restaurants, clubs, theaters, cinemas, bus stations, railway stations and other similar premises, notwithstanding any manufacturing, processing or preserving goods for sale.”</p> <p>Therefore the construction activity doesn’t come under the scope of LT-III and HT-I Industrial categories. Hence, they cannot be categorized under LT-III and HT-I categories.</p> <p>The licensees have proposed the definition of Temporary categories to bring in greater clarity as below: Temporary supply is applicable to</p> <ul style="list-style-type: none"> • All Construction activities like construction of all types of structures/infrastructure such as buildings, bridges, fly-overs, dams, Power Stations, roads, Aerodromes, tunnels for laying of pipelines, etc. • Exhibitions, circuses, outdoor film shootings, touring talkies, etc. • This tariff category is applicable for connections that are temporary in nature and hence for construction purpose, a consumer shall be given a temporary connection only. <p>“Temporary supply can be given initially for a period up to one year as per the tariff applicable under the Temporary supply category. After the expiry of one year, the consumer is at liberty to seek further extension.”</p>

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5.	<p>Telangana Nayee Brahmana Aikya Vedika, H.No.16-2-701/6/14 A/4, Beside Charmes Showroom, Malakpet, Hyderabad</p>	<p>Response of the Licensee</p>															
	<p>గతంలో ప్రభుత్వం ప్రకటించినట్లు G.O.Ms.No.1/6-1-2016 క్షౌరశాలలకు విద్యుత్ సప్లై చేస్తూ పై జీ.వో ను విడుదల చేశారు. కాని ఇట్టి G.O. ప్రకారము క్షౌరశాలలకు Domestic గా కాక Commercial గానే సప్లై చేస్తున్నారు. దీని వలన క్షౌరశాలలు నడుపుతున్న నాయీ బ్రాహ్మణులకు సరియైన న్యాయం జరగడములేదు. అంతే కాకుండా ఇట్టి G.O. రాష్ట్రం లోని అధిక జిల్లాలలో అమలు చేయడం లేదు. కావున ఇట్టి G.O.ను సవరించి క్షౌరశాలలకు LT-II D కాకుండా Domestic క్యాటగిరీ నందు విద్యుత్ సరఫరా చేయునట్లు మరియు అన్ని జిల్లాలలో అమలు జరుగునట్లు తమరు శ్రద్ధ తీసుకొని త్వరగా సరియైన G.O.ను విడుదల చేయగలరని మిమల్ని ప్రార్థిస్తునాం.</p>	<p>2016-17 రిటైల్ సరఫరా చార్జీల ప్రకారం, LT-I డొమెస్టిక్ చార్జీలు గృహ ఆవరణలకు లైట్లు, ప్యాన్లు మరియు ఇతర గృహ అవసరాలకు విద్యుత్ సరఫరా చేయడానికి వర్తించును. గృహసంబంధ ఏర్పాటు /పరిసరాల నివాసస్థలం అనగా నివాస ప్రయోజనం కోసం ఉపయోగించేవి. దీని ప్రకారం క్షౌరశాలలు LTడొమెస్టిక్ వర్గం పరిధిలోకి రావు.</p> <p>కావున గౌరవనీయ కమిషన్ వారు, హాయిర్ కటింగ్ సెలూన్లకు (నెలకు 200 యూనిట్స్ వరకు వినియోగించేవి), కమర్షియల్ క్యాటగిరీ నందు కొత్త సబ్ క్యాటగిరీ ఏర్పర్చి కమర్షియల్ క్యాటగిరీ కన్నా తక్కువ ధరలను నిర్ణయించారు. 2016-17 సంవత్సరం నకు, ఈ ఉప విభాగానికి రూ.3.39 కోట్లు సబ్సిడీని తెలంగాణ ప్రభుత్వం వారు అందజేస్తున్నారు. హాయిర్ కటింగ్ సెలూన్లకు నిర్ణయించిన ధరలు ఈ క్రింది పట్టికలో ఇవ్వడం జరిగింది.</p> <table border="1" data-bbox="1411 876 2419 1411"> <thead> <tr> <th data-bbox="1411 876 1841 1055">సబ్ క్యాటగిరీ</th> <th data-bbox="1841 876 2150 1055">స్థిర చార్జీలు (రూ./kW/ నెలకు)</th> <th data-bbox="2150 876 2419 1055">విద్యుత్ ఛార్జీలు (రూ./ యూనిట్స్)</th> </tr> </thead> <tbody> <tr> <td colspan="3" data-bbox="1411 1055 2419 1144">LT II (D): హాయిర్ కటింగ్ సెలూన్లకు (నెలకు 200 యూనిట్స్ వరకు వినియోగించేవి)</td> </tr> <tr> <td data-bbox="1411 1144 1841 1226">0-50</td> <td data-bbox="1841 1144 2150 1226">60</td> <td data-bbox="2150 1144 2419 1226">5.30</td> </tr> <tr> <td data-bbox="1411 1226 1841 1315">51-100</td> <td data-bbox="1841 1226 2150 1315">60</td> <td data-bbox="2150 1226 2419 1315">6.60</td> </tr> <tr> <td data-bbox="1411 1315 1841 1411">101-200</td> <td data-bbox="1841 1315 2150 1411">60</td> <td data-bbox="2150 1315 2419 1411">7.50</td> </tr> </tbody> </table>	సబ్ క్యాటగిరీ	స్థిర చార్జీలు (రూ./kW/ నెలకు)	విద్యుత్ ఛార్జీలు (రూ./ యూనిట్స్)	LT II (D): హాయిర్ కటింగ్ సెలూన్లకు (నెలకు 200 యూనిట్స్ వరకు వినియోగించేవి)			0-50	60	5.30	51-100	60	6.60	101-200	60	7.50
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S.No.	Summary of Objections / Suggestions	Response of the Licensee
6.	Reliance Jio InfoComm Limited	
	<p>In Telangana , the Telecom Service Providers are charged for the electricity consumption at the cell tower under the category LT - II(B) i.e. Non Domestic/Commercial category, though the Switching centres are charged under the category HT- II (Industry —others).</p> <p>Except for the MSCs, Mobile Towers are categorized as "Commercial Users" and levying Electricity Charges which are applicable on Commercial Establishments. The energy input for these telecom tower sites is availed from Low Tension (LT) supply. And these towers are categorized as Commercial consumer by the state Power Distribution utilities. Being an energy intensive business sector, our business works on reliable supply of electricity across all the cell sites by state Power Distribution utilities.</p> <p>Determination of tariff:</p> <p>As per section 62 of the Act, different tariff categories shall be determined according to the consumer's load factor, power factor, voltage, total consumption of electricity during any specified period or the time at which the supply is required or the geographical position of any area.</p> <p>It is to appraise you that various cellular towers/telecommunication equipment which are installed across the state of Telangana in various areas such as agriculture, residential and industrial premises/zone cater the same purpose of providing telecom services.</p> <p>Commercial Purpose — Meaning:</p> <p>We further submit that the commercial category is applicable for commercial activities such as running of restaurants, private offices, fitness clubs, retail stores, financial institutions,</p>	<ul style="list-style-type: none"> As per the definition stated in the Tariff Order 2016-17 for LT-Category III <i>“Industrial purpose shall mean, supply for purpose of manufacturing, processing and/or preserving goods for sale, but shall not include shops, business houses, offices, public buildings, hospitals, hotels, hostels, choultries, restaurants, clubs, theaters, cinemas, bus stations, railway stations and other similar premises, notwithstanding any manufacturing, processing or preserving goods for sale.”</i> <p>As there is no manufacturing, processing and preserving goods activity, Telecom towers are being categorised under LT-II-Non-Domestic/Commercial category.</p> <p>Further to the above it is to inform that LT-II Non Domestic/Commercial category is applicable for</p> <ol style="list-style-type: none"> Consumers who undertake Non Domestic activity. Consumers who undertake Commercial activity. Consumers who do not fall in any other LT category i.e., LT – I, LT – III to LT –VIII categories. Consumers who avail supply of energy for lighting, fans, heating, air conditioning and power appliances in Commercial or Non-Domestic premises such as shops, business houses, offices, public buildings, hospitals, hostels, hotels, choultries, restaurants, clubs, theatres, cinema halls, bus stations, railway stations, timber depots, photo studios, printing presses etc. <p>It means LT-Cat II is not only applicable for commercial activity but also for the activities which are not covered in any other LT categories. As Cell towers business does not fall under any of LT –I,III,IV,V,VI,VII</p>

<p>supermarkets, auto dealerships, and other establishments with common business interest etc., under any stretch of imagination, telecommunication network cannot be equated with any of the above activities.</p> <p>That the Hon'ble Supreme court of India in Management of the Federation of Indian Chambers of Commerce and Industry Vs Sri R.K. Mittal(1972) 2 S.C.R. 353 held that the commercial activity must be connected with carrying of trade and business generally, in the premises. The Hon'ble court further held that for the purpose of falling under the commercial establishment/premises, the premises should primarily be the commercial premises and secondly the premises should deal in carrying (a) any trade, business or profession, or (b) any work in connection with or incidental or ancillary thereto is carried on. Further, to mention that even the definition of shop cannot be extended to the cell towers. As defined shop means any premises where goods are sold, either by retail or wholesale or where services are rendered to customers, and includes an office a store - room, godown, warehouse, or workhouse, or work place, whether in the same premises or otherwise, used in or in connection with such trade or business engagement but does not include a factory or commercial establishment. Therefore, no stretch of imagination equates the telecommunication network towers with that of the commercial activities stated above.</p> <p>Hence, we humbly request you to consider our above application and classify telecommunication infrastructure deployed by as an Industry (both LT and HT as may be applicable) irrespective of the zonal location (residential, commercial or industrial) and consider for "Special Industrial Tariff" to the entire telecommunication infrastructure deployed in the State of Telangana</p>	<p>categories, it comes under LT-II category.</p>
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<p>The Telecom Business in India has been recognized as an "Industry" under various Statute Rules and/or Regulations, Government Notification etc. Emphasis is placed on the recent National Telecom Policy 2012, which specifically refers Telecom Business as the fastest growing industry in Indian Economic History.</p>	<p>The classification of telecom Business under various Statute Rules and/or Regulations, Government Notification, is not binding upon the utilities or the Electricity Regulatory Commissions which function on the principles of Electricity Act.</p>
<p>We wish to bring to your notice that the judgement of the Hon'ble Appellate Tribunal for Electricity (Appellate Jurisdiction) 7th November, 2012 in Appeal No. 234,235,211 and 215 of 2012 allowed the appeal by setting aside the order regarding categorization of Mobile Towers, Micro Wave Towers, Satellite Antennas used for communication activity to HT/LT Commercial Category from HT/LT Industrial category prevailing prior to the date of the impugned order.</p>	<p>The judgement of Hon'ble Appellate Tribunal for Electricity in Appeal No.234,235,211 and 215 of 2012 has affirmed that the distribution licensee has liberty to propose for re-categorisation of the Appellants i.e. Mobile Operator before the State Commission on which the state Commission may pass appropriate orders. The relevant part of the order is placed below:</p> <p><i>“13.However, the distribution licensee (R-2) is given liberty to file a fresh petition containing the proposal regarding re-categorisation of the Appellants in appropriate tariff category before the State Commission which in turn shall consider the same and pass the appropriate orders in accordance with law after hearing all the concerned parties.</i></p> <p><i>14.This order will apply to all the consumers coming under the specified category of telecommunication towers. We must make it clear that we do not want to go into the merits of the matter, and as such we are not giving any opinion on this issue. It is for the State Commission to decide the issue after considering the materials placed by the parties uninfluenced by the conclusion earlier arrived at.”</i></p> <p>The Distribution Companies are categorizing the Cell Towers as per the terms and conditions provided in the Tariff Orders approved by the Honble Commission.</p>

	<p>Further the Maharashtra Government has classified Telecommunication sector as an Industry and has classified the tariff applicable as IT-V and HT-I i.e. "Industry".</p>	<p>Categorization of activity may differ from one state to another state based on the policies of the state government and local conditions. This has been affirmed by Hon'ble Appellate Tribunal of Electricity in Appeal No. 265 of 2014</p> <p><i>"The State Commission may take reference from the orders passed by other State Regulatory Commissions while considering the categorization of various class of consumers for tariff applicability but it is not mandatory for compliance, however, the State Commissions have to comply with the principles set out in Sec 62 (3) of the Electricity Act, 2003."</i></p>
	<p>Even in Telangana Railway Infrastructure which is equivalent to that of Telecommunication sector is categorized under a separate beneficial class (HT-III and HT-V).</p>	<p>The same grouping of consumers under various other acts may not holds good under the Electricity Act as the perspective and the underlying principles are different to each other and the same class of consumer can have different tariffs at different voltages depending upon their nature of requirements.</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee														
	<p>7(a). John Thomas, Cheif Electrical Engineer, South Central Railway</p> <p>South Central Railway avails power supply at 220/132kV for 16 Traction sub-stations in Telangana State. The total consumption of Railway Traction will be 555 MU approx. per annum and paying a substantial amount of Rs.390 Crores approx. to DISCOMs in Telangana. The Railways are a bulk consumer and paying major revenues to Discoms. Hence the grievances of Railways are to be considered while fixing the tariff for HT-V(A) Category. In view of new electrification works 7 more traction substations in Telangana at Mattampalli, Manoharabad, Thimmapur, Kothapalli, Miryalaguda, Ramannapet and Mahaboobnagar are going to be commissioned in 2017-18, 18-19 and further consumption will be increased. Higher traction tariff slashes Rate of Return (ROR) for the new electrification projects and making them non-viable.</p> <p>Railways are endeavoring to minimize the cost of electricity. A policy decision has been taken by Ministry of Railways as deemed licensee to avail power through open access for the purpose of Railway Traction. Accordingly, Ministry of power has allotted 50MW power to Telangana State for the purpose of Railway Traction from RGPPL.</p> <p>Railway option for open access for availing traction power supply.</p> <ul style="list-style-type: none"> • Due to discriminative policy of Discoms and over burden, Railways as a distribution licensee, already planned to avail power through open access in Telangana state upto March 2022. • It is brought to the notice of the Hon'ble commission; Indian Railways are already availing power through open access in various states/Railways as following. As a 	<p>a. The average cost of service in the state of Telangana for FY2017-18 is INR 6.84/ unit. The present tariff for Railways is INR 7.10/ unit, which is almost aligned to the average cost of service of the Discom. Any reduction in tariff lower than CoS leads to revenue loss for the Discoms.</p> <p>b. Further, the railways are availing the following benefits from the supply of power by the Discom.</p> <ol style="list-style-type: none"> The average load factor of operation of railways is about 30%, which is substantially lower than the load factor of other bulk load consumers such as industrial category. Railways is availing power supply over two phases instead of the standard 3-phase power supply, which leads to imbalance in the system and harmonic distortion. Bulk load consumers like industries operate at a higher LF which is beneficial to the Discom. However they are subjected to payment of demand charges and energy charges. If industrial tariff were to be extended to railways, the effective tariff for railways would be higher than INR 7.10/KWh for most of the time because of lower power factor. Railways are availing un-interrupted power supply in addition to the benefits as listed above. Further the tariff for railways is lower than bulk consumers who operate at a higher load factor. Many states in India are charging two part tariff for railway traction, which can be referred from the following table. <table border="1" data-bbox="1365 1166 2451 1391"> <thead> <tr> <th colspan="4" data-bbox="1365 1166 2451 1242">As per their respective tariff orders for FY16-17</th> </tr> <tr> <th data-bbox="1365 1242 1642 1391">State</th> <th data-bbox="1642 1242 1964 1391">Demand charges (INR/kVA/month)</th> <th data-bbox="1964 1242 2188 1391">Energy charges (INR/kVAh)</th> <th data-bbox="2188 1242 2451 1391">Effective tariff at 30% LF (INR/kVAh)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>			As per their respective tariff orders for FY16-17				State	Demand charges (INR/kVA/month)	Energy charges (INR/kVAh)	Effective tariff at 30% LF (INR/kVAh)				
As per their respective tariff orders for FY16-17																
State	Demand charges (INR/kVA/month)	Energy charges (INR/kVAh)	Effective tariff at 30% LF (INR/kVAh)													

distribution licensee cross subsidy charges are also not applicable for Railways.

Railway/State	Power Availing from	Unit Cost
Central & Western Railway (Maharashtra, Gujarat & Madhya Pradesh states)	RGPPL	Rs. 4.70/kWh

- In view of this, Chattisgarh state power distribution company limited (CSPDCL) has proposed reduced traction tariff in their ARR for the year 2017-18 as Demand charges Rs. 350/kVA/month and energy charges Rs. 2.90/kVAh for the year 2017-18 (Equivalent to Rs. 4.29/Unit).
- Similarly AP Discoms are also proposed traction tariff in their ARR for the year 2017-18 as Demand charges Rs. 500/kVA/month and energy charges Rs. 3.50/kVAh for the year 2017-18 equivalent to Rs. 5.48/kVAh (at average load factor 35%) at a reasonable price. Further, after completion of public hearings AP Transco offered to supply power at Rs. 4.95/kVAh and negotiations are under progress for further reduction to RS. 4.70/kVAh.
- In this circumstance, existing tariff of TS Discoms Rs. 7.10/kVAh is very high and unreasonable comparatively with other states. Higher tariff comparatively open access tariff, over burden to Railways and prompt paying bulk consumer. The high tariff of Discoms forcing railway to go for open access to meet its consumption.

Recently, Hon'ble APERC has fixed traction tariff for 2017-18 reasonably, at Rs.300/kVA Demand charges and

Telangana	--	7.10	7.10
Maharashtra	235	6.51	7.60
Tamil Nadu	300	6.35	7.74
Madhya Pradesh	310	5.70	7.14

From the above table, it is observed that the effective tariff for railways in Telangana State is lower when compared to other key states across India.

In view of the above, the following conclusions are hereby submitted before the Hon'ble Commission for perusal.

- Essentially the tariffs shall recover the Cost of Service in order to avoid revenue loss to the Discoms. Hence, the Tariff to Railway Traction cannot be lower than CoS. Further, the Railways are benefitted by the existing single part tariff despite of the lower load factor.
- Further reduction in Energy charges in the form of rebates will lead to revenue loss to the Discoms.

<p>Rs.3.55/kVAh Energy charges which at the current load factor works to Rs. 4.74/kVAh. If tariff on same lines is fixed for Telangana also, by Hon'ble Commisioner of Telangana State, Railways will be happy to continue drawing power from the state network without trying to draw electric power for traction through open access. It is requested that Hon'ble Commission may consider the Railways plea and fix a reasonable tarff on similar lines as Andhra Pradesh State.</p> <p>Keeping the above in view, Hon'ble commission is requested to consider and it is prayed that,</p> <ul style="list-style-type: none">a) The tariff under category HT-V Railway traction be fix at Rs 4.70/KVAhb) To retain single part tariff as existingc) To give impetus to electrification of Railway network, a rebate of at least 10% of energy charges be allowed for a period of five years similar to Chattlsgarh and Madhya Pradesh.	
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S.No.	Summary of Objections / Suggestions	Response of the Licensee						
7(b). L.L.Meena, Chief Electrical Distribution Engineer, South Central Railway, Secunderabad.								
1.	<p>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.</p> <p>South Central Railway avails traction power at 132 kV at 16 Traction sub-stations in Telangana State. The total consumption of Railway traction is 557.9 MU for the year 2016-17 and paying a substantial amount of Rs392.87 Crores to DISCOMs in Telangana.</p>	<p>Licensee submits that average cost of supply for TSDISCOM is around INR 6.84 per unit whereas railways are charged at INR 7.10 per unit, with very minimal margin.</p> <p>In addition to that, licensee humbly submits that as per Financial Statements & Operating Statistics 2014-15, Indian Railways consumed 3.83 liter of diesel or 18.9 kWh of electricity for every 1000 gross tonne km. Assuming a present cost of INR 60 per liter of diesel, operating cost of running a electric train would same at around INR 12.16 per unit, which is substantially higher than the tariff proposed.</p> <p>Licensee submits that understanding the significance of railways to the Nation, there is no tariff hike proposed for Railway Traction.</p>						
2.	<p>Railway option for open access for availing traction power supply</p> <ul style="list-style-type: none"> It is brought to the notice of the Hon'ble Commission, Indian Railways are already availing power through open access in various States/Railways as following. As a distribution Licensee cross subsidy charges are also not applicable for Railways. <table border="1" data-bbox="379 1019 1319 1323"> <thead> <tr> <th data-bbox="379 1019 889 1133">Railway / State</th> <th data-bbox="897 1019 1077 1133">Power availing from</th> <th data-bbox="1085 1019 1319 1133">Unit / Cost</th> </tr> </thead> <tbody> <tr> <td data-bbox="379 1133 889 1323">Central, Western & South Eastern Railway (Maharashtra, Gujarat, Madhya Pradesh, Jarkhand & UP States)</td> <td data-bbox="897 1133 1077 1323">RGPPL</td> <td data-bbox="1085 1133 1319 1323">Rs.5.50/kWh</td> </tr> </tbody> </table> <ul style="list-style-type: none"> Due to discrimination policy of Discoms and over burden, Railways as a deemed Licensee, already planned to avail 	Railway / State	Power availing from	Unit / Cost	Central, Western & South Eastern Railway (Maharashtra, Gujarat, Madhya Pradesh, Jarkhand & UP States)	RGPPL	Rs.5.50/kWh	<p>Licensee wants to bring in notice cost of power availed from RGPPL at INR 5.50 per unit is not the landed cost of power.</p> <p>Landed cost of power in Telangana if procured from the same source would be around INR 7.55 per unit.</p> <p>(Indian railways would need to pay POC charges of INR 1.46 per unit, PGCIL losses (withdrawl and injection) of INR 0.15 per unit, Telangana transmission losses of 3.35% (INR 0.16 per unit) and Telangana Transmission charges of INR 0.44 per unit) – all calculations are done assuming 30% LF</p>
Railway / State	Power availing from	Unit / Cost						
Central, Western & South Eastern Railway (Maharashtra, Gujarat, Madhya Pradesh, Jarkhand & UP States)	RGPPL	Rs.5.50/kWh						

<p>power through open access in Telangana State up to March 2022.</p> <ul style="list-style-type: none"> • In view of this, it is brought to your kind notice, Hon'ble Andhra Pradesh Electricity Regulatory Commission (APEREC) has fixed traction tariff as Demand charges Rs.300/kVA/Month and energy charges Rs.3.55/kVAh) for the year 2017-18. (Equivalent to Rs.4.74/Unit) and retain with Discoms by decreasing traction tariff drastically. • In this circumstance, existing and proposed tariff of TS Discoms Rs.7.10/kVAh is very high. Higher tariff comparatively open access tariff, over burden to Railways and prompt paying bulk consumer. The higher tariff of Discoms forcing Railway to go for open access to meet its consumption. 	
<p>8.0 Comparison of Railway traction with HT-I(B)</p> <p>The Existing Railway traction tariff of Rs. 7.10 per unit is substantially higher than the HT-1(B) category by Rs.5.00 per unit (42%) despite the fact that both are availing supply at same voltage level.</p> <p>Except load factor, Ferro Alloys has no other advantages over Railways. Contribution of Railways to economic and social developments of country far outweighs the higher load factor of Ferro Alloys. It is brought to the kind notice of commission that load factor of Railways is showing an upward trend due to introduction of <u>intermediate block section</u> with the help of IB signals. This enables running of more trains and hence higher load factor.</p> <p>As brought out in Para 7.0, the Railway draws substantial supply during off peak period also, thus helping in improving base load and supporting the grid stability. Charging of such higher tariff from Railway is irrational and unjustified. The Railways being a public utility organization, charging at</p>	<p>Distinction among various consumers is as per the section 62(3) of the Act such as “load factor, power factor, voltage, total consumption of electricity etc. When the differentiation is based on the factors postulated in sub-Section (3) of Section 62 of the Act, the distinction cannot be challenged. The consumers falling in different categories cannot claim to be treated alike. Hence, the distinction between the Railways and the Ferro Alloy Consumers cannot be made.</p> <p>Further it is pertinent to mention here that Railways were not being subjected to power cuts which were imposed on other HT consumers during FY 2012-13 and FY 2013-14. Thus, the Railways are benefited from supply side as compared to the other HT consumers as they are enjoying the uninterrupted power supply.</p> <p>It is pertinent to mention here that the Ferro alloy units at present are on tariff condition of “<i>guaranteed energy off-take at 6701/kVAh per kVA per annum on average contracted demand or average actual demand maximum demand, whichever is higher. The energy falling short of 6701</i></p>

<p>unreasonably higher rates is unjustified. Hon'ble commission is requested to critically examine the preferential treatment / subsidy given to Ferro Alloys which is unjustifiable and against basic principles of Electricity Act 2003 (section 61).</p>	<p><i>kVAh per kVA per annum will be billed as deemed consumption”.</i></p>
<p>8.0 Extension of Subsidy to certain categories – Request for Deletion: Section 61(g) of Electricity Act 2003 stipulate that “the tariff progressively reflects the cost of supply of electricity, and also reduces and eliminates cross- subsidies within the period to be specified by the appropriate commission.” From the cost of service and tariff models of the various DISCOMs, it is noted that certain categories have been heavily subsidized and the cross subsidy is charged to other consumers like Railways. This needs to be eliminated as per the stipulation under Section 61 (g) of the Electricity Act, 2003. Hon'ble Commission is requested to fix tariff reasonably for HT-V category. Cross-subsidy element being charged heavily to Railways is unjustified and as it is required to be reduced to zero gradually. Hon'ble Commission is requested to consider this aspect while fixing the tariff for railway traction and other consumers.</p>	<p><i>The section 61 (g) of the Electricity Act-2003 is amended by Act 26 of 2007 wherein the word elimination of cross-subsidies was removed and the same is reproduced here “the tariff progressively reflects the cost of supply of electricity, and also reduces the cross- subsidies in the manner specified by the appropriate commission.”</i> The legislature by amending Section 61(g) of the Electricity Act by Act 26 of 2007 has expressed its intent that cross subsidies may not be completely eliminated.” The average cost of service in the state of Telangana for FY2017-18 is INR 6.84/ unit.The present tariff for Railways is INR 7.10/ unit, which is almost aligned to the average cost of service of the Discom. Any reduction in tariff lower than CoS leads to revenue loss for the Discoms.</p>
<p>9.0 Determination of Cross Subsidy Surcharge and additional Surcharge for open access for FY2017-18 Ministry of power vide lr. No. 25/19/2004-R &R dt.06.05.2014 clarified that Railways is a deemed licensee under the third provision to section 14 of Electricity Act 2003. According to CERC order dated 02.11.2015, petition No. 197/MP/2015 and APTEL order dated 16.12.2015 & 27.09.2016 on Appeal No. 276/2015 “The Indian Railways is a deemed licensee under third provision to section 14 of</p>	<p>Under the preview of Hon'ble Commission.</p>

<p>Electricity Act and no separate declaration to that effect is required from the Appropriate Commission”.</p> <p>It is also submitted that, National Tariff Policy 8.5.1 stipulates “ Provided further that the appropriate commission, in consultation with the Appropriate Government, shall exempt levy of cross subsidy charge on the Railways as defined in Indian Railways Act, 1989 being a deemed licensee on electricity purchased for its own consumption.</p> <p>In view of this, Hon’ble Commission is requested to exempt Railways,as a deemed licensee from payment of cross subsidy surcharge as per spirit and compliance of guidelines of National Tariff Policy.</p>	
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S.No.	Summary of Objections / Suggestions	Response of the Licensee
	<p>8. Animal Husbandry Department, Yadadri</p> <p>I am to inform that at presently chaff cutters are being charged Rs.4/-per unit under category-IV. If Converted to Category-V, only maintainence charges of Rs.30/- per month will be charged. This is not only benefit the farmers financially but also helps in effective use of chaffed fodder to increase milk production. It is suggested to convert the charges of electricity of Chaff Cutters from category-IV to category-V (Agriculture) since the Chaff Cutters are Supplied on Subsidy (50%) under various state and central government programmes and change the rates accordingly.</p>	<p><i>“As per Tariff Order for FY 2016-17, the LT-IV(B)Agro Based Activities Category is applicable to bonafide (as certified by DE/Operations)small agro based industrial units located in rural areas covering Sisal fibre extraction co-operative units, Vermiculture, Sericulture, Mushroom growing, Rabbit farming, Sheep farming, Goat farming, Emu birds farming, Apiculture (honey making), Chaff-cutting, Millets making and Dairy farming activities with connected load upto 10 HP (including incidental lighting load).Accordingly, Chaff Cutting units are being categorized under LT-IV(B) Agro Based Category.</i></p> <p>As per terms and conditions of the Tariff order, the Chaff cutting activity for cutting fodder grass to feed the animals comes under the scope of LT-IV(B)Agro Based Activities. Further, the LT-IV Cottage and Agro Based industries category is a subsidized category, wherein it is being subsidized through cross subsidy from other class of consumers.</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
9. Telangana Small Scale Industrial Painting and Powder Coating Industries Association		
	<p>We are Industrial Association comprising about 60 to 80 units which are Small Scale Processing units and registered with MSME, Govt. of Telangana. All these units are being treated as SSI (Small Scale Industries) since long back by Electricity Department, but recently TSSPDCL authorities are treating these units as Commercial and issuing Assessments Notices to us with back billing. Since our units are small scale Processing units and registered with MSME, Govt. of Telangana, we request your good selves not to treat our units i.e. "Painting and Powder coating units" as SSI (Small Scale Industries) for which, we shall be thankful to you.</p>	<p>It was observed during inspection that the Powder coating activity consists of Cleaning metal surface of the items such as GI Boxes, Metal doors, Battery carrying units., with some chemical water, which will be powder coated and kept in heating chamber for drying purpose. As the activity carried out by powder coating units does not include Processing/Manufacturing, as per tariff order these units are re-categorized from Industry category to Commercial Category and the back billing was done for those units.</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
10.	R.K. Agarwal, Chairman, Telangana Spinning Mills & Textile Mills Association	
	<p>The Govt. of Telangana has advised CMD of TSSPDCL and TSNPDCL, to allow the incentive of Rs.2/- per unit in the power bill from October-2016 onwards to all spinning mills operating in the telangana state after taking due permission from TSERC but the Power concession of Rs.2/- was made applicable only from October-2016 billing month.</p> <p>Now since new tariff will be made applicable for 2017-18, we therefore request your good selves to include and approve power tariff incentive of Rs.2/- for spinning mills in the new tariff to be made applicable for spinning mills for the financial year 2017-18.</p>	<p>Discom will extend the incentive to spinning mills as per the directions of Government of Telangana and TSERC for FY 2017-18</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
11.	Commissioner, Greater Hyderabad Municipal Corporation	
	<p>There are about 4,50,000 street lights of different wattages with connected load of 74MW existing in Hyderabad city to illuminate the roads. To implement energy conservation measures in street lighting, GHMC is planning to introduce energy efficient LED system by replacing existing conventional street lights which will reduce about 42MW of connected load on distribution network during peak load hours. Under the existing retail supply Tariff Schedule, the street lighting service for Municipal Corporations are under LT-VI(A) category i.e. Rs.7.1/Unit. If there is reduced Tariff Schedule for Street lighting services with LEDs that will attract the municipal corporations for installation of LED street lights.</p> <p>In view of the above, we request the Regulatory Commission to bifurcate the street lighting services for municipal corporations under LT-VI(A) as Conventional Street lighting services and LED Street lighting services at reduced rates. Therefore we request you to consider the above positively and issue necessary directions to DISCOMs in forth coming Tariff orders.</p>	<p>Implementation of energy conservation measures like introducing energy efficient LED system in the place of conventional street lights reduces the annual energy consumption leading to financial benefit of the consumer i.e. GHMC. Additionally the usage of LED system imparts reactive power in to the system/network which leads to lower Power factor and technical loss as the energy for streetlights under LT-VI A is being built based on active power i.e.kWh basis but not kVAh basis. Hence the GHMC is more benefitted with LED system than the Discoms in the present tariff structure.</p> <p>Further the categorization shall be done based on nature of activity, power factor, load factor, voltage, consumption etc. as per Sec. 62(3) of the Electricity Act, 2003</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
12.	Suguna Metals Limited, 1-8-673, Azamabad, Hyderabad – 500020, Contact No. 9391033606	
	<p>It is respectfully submitted that the licensee has not implemented the orders till date passed by Hon'ble CGRF dated 26.10.2015 in C.G.No. 286 of 2015, dated 23.2.2016 in C.G.No. 649 of 2016, dated 20.5.2016 in C.G.No. 724 of 2016, dated 20.5.2016 in C.G.No. 725 of 2016, dated 20.5.2016 in C.G.No. 726 of 2016, dated 20.5.2016 in C.G.No. 727 of 2016, dated 20.5.2016 in C.G.No. 755 of 2016, dated 24.6.2016 in C.G.No. 777 of 2016, dated 24.6.2016 in C.G. No. 780 of 2016.</p> <p>Under Sub Section 2.56 of Regulation 3 of 2016 dated 31.10.2015 passed by the Hon'ble TSERC, the Hon'ble CGRF shall issue notice either suo moto or at the instance of consumer for non compliance of its order (s) within due date prescribed. Further, the Hon'ble CGRF conferred with the power to award compensation of Rs. 25,000/- for each non-compliance and in case of continuing failure with an amount of Rs. 1000/- every day during which the failure continues after non compliance of such direction.</p> <p>It is respectfully submitted that the in the above referred orders the Hon'ble CGRF has not taken the Suo moto action. However, on instance of the consumer the Hon'ble CGRF has awarded the compensation orders which are pending till date for implementation by licensee.</p> <p>It is respectfully submitted that the main reason behind of non implementation of the orders is out of four members of the Hon'ble Forum two members are being nominated by the licensee of the cadre of Chief General Manager who are regular employee of licensee who are always to be worked under pressure / control of the licensee when they hold post of member in the Forum. Another main reason is that the Hon'ble Forum is not having any executive power.</p> <p>It is pertinent to note at this juncture that when the order</p>	<p>Licensee is implementing all the orders issued by CGRF except in few cases where the CGRF orders are contradictory to the Tariff Order/Regulation of the Honble Commission.</p> <p>The licensee neither had an opportunity to appeal before Vidyuth Ombudsman nor to file a petition before Honble High Court against the CGRF orders. This has been raised by the licensee earlier before the Honble Commission vide Lr. No. TSSPDCL/Comml/IPC-II/RAC/D.No. 3038 Dt. 26.02.2016 to amend the Regulation No. 3 of 2015 seeking equal opportunity to both the parties to file an appeal.</p> <p>The Licensees are obliged to follow the terms and Conditions of the Tariff Order & Regulations issued by the Honble Commission.</p>

passed by Hon'ble CGRF is in favour of licensee recovers the amounts awarded by the Hon'ble Forum by disconnecting power supply. But when the order is passed in favour of consumer, the consumer is not having any option to recover the amounts awarded by the Hon'ble CGRF. Hence, the consumer also may be empowered to recover the amounts passed by the Hon'ble CGRF in favour of consumer compensation amounts.

In view of above mentioned facts, it is prayed to Hon'ble TSERC to :

- a) Reconstitute the Hon'ble CGRF by appointing two members by Hon'ble TSERC in place of nominated members by the licensee.
- b) The Hon'ble CGRF shall be confer with executive power to be excercised when the consumer approach before the Hon'ble CGRF with executive petition when the orders passed by Hon'ble Forum is not implemented by the licensee within due date
- c) A clause to be included in the Tariff Order permitting the consumer to approach Hon'ble CGRF with executive petition to recover amount passed by the Hon'ble CGRF including compensation passed under Sub Section 2.56 of Regulation 3 of 2015 dated 3.10.2015
- d) The executive powers of the Hon'ble CGRF to be applicable for all the pending orders as on date of issue of order.
- e) It is respectfully submitted that the objector shall be allowed to appear personally before Hon'ble TSERC in public hearing to be conducted by Hon'ble TSERC to enable the objector to put forth additional information, if any for consideration of the Hon'ble TSERC as per section 64 (3) of Electricity Act,2003.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
13. Swamy Jaganmayananda, Husnabad village, Kodangal mandal, Vikarabad District, Telangana State		
i.	AGL Connections in Mahabubnagar District are pending to the extent of 28541 nos. as on 3.9.2016 as given in reply to my RTI application.	Out of 28541 pending release of services in Mahabubnagar district, 24093 services have been released so far. Balance will be released within three months.
ii.	In spite of your claim that you have done a lot of work in line rectification, laying feeder lines and erecting sub-stations and distribution of DTRs. 7978 DTRs burnt/damaged in Mahabubnagar during the year 2016-17. This is due to lack of proper supervision and maintenance of the DTRs.	In Telangana state, unlike previous years, 9 hours power supply has been implemented successfully for agriculture sector. Incidentally the area of cultivation also increased due to availability of adequate ground water level. This has slightly increased the loads on electricity network. However, sufficient healthy DTR rolling stock was maintained for immediate replacement of failed DTRs
iii.	It is brought to your notice many a time that the Line Men/CL or other persons relating to maintenance of lines and DTRs are not responding to our requests for repairs etc. Even now they are not turning out in time for repairs as and when called for. Hence, the consumers are venturing to attend to the repair work of lines/DTRs etc and in the process they are getting electric shock and in many cases they are dying. You are not taking any action against your employees concerned but blaming the consumer himself for his fatal accidents.	Instructions to respond to the complaints received from the consumers are being issued to the field staff time to time. Any case of neglect, delay or irregularity committed by any employee is taken up with appropriate disciplinary action as per service regulations after conducting due enquiry.
iv.	As most of the DTRs are not provided with fencing protection, the cattle is getting electrocuted and dying. Your people are not doing anything in this regard. The Department is giving some reply or the other. But not doing anything so far. You are, hence requested to constitute a committee and include me as one of the members of that Committee, so that I can personally take them and show how many DTR are existing without any fencing and AB Switch, earthing etc. even today.	In the public places, Fencing protection is provided around DTRs. DTRs are being erected on Pole mounted structures and on plinth with 6 feet height from the ground. A.B. Switches are being provided at the DTRs wherever there are no AB switches. Till March 2017, 11,939 A.B. Switches are provided in TSSPDCL. Whenever new transformer is erected, same is being erected along with AB switch. The villagers are advised not to operate the DTRs and are requested to take the services of concerned lines staff to avoid accidents.

v.	When thousands of people are dying due to electric fatal accidents your department is not granting ex-gratia to even hundreds of people.	<p>The process to pay the compensation is made online and exgratia is being paid on uploading of all the required documents such as FIR, postmortem, legal heir etc.</p> <p>The details of accidents and exgratia payments are,</p> <table border="1" data-bbox="1365 342 2456 456"> <thead> <tr> <th>Year</th> <th>Deaths due to electrocution</th> <th>Exgratia paid</th> </tr> </thead> <tbody> <tr> <td>2016 - 17</td> <td>89</td> <td>53</td> </tr> <tr> <td>2015 - 16</td> <td>144</td> <td>112</td> </tr> </tbody> </table>	Year	Deaths due to electrocution	Exgratia paid	2016 - 17	89	53	2015 - 16	144	112
Year	Deaths due to electrocution	Exgratia paid									
2016 - 17	89	53									
2015 - 16	144	112									
vi.	The department provides DTRs in cases of 3-5 consumers paying the amount in the form of DDs and providing 3 poles and cable for the distance from the DTR to his bore point in case a single consumer pays the amount in DD form. In most of the cases the consumers are not being provided with poles. Hence, the consumers are resorting to taking power by drawing the cable over wooden poles. In many such cases, human being and cattle are being electrocuted leading to deaths.	After sanction of estimate, drawing of materials and erection of poles, lines and DTRs, service connection will be released. In case if there is any issue regarding availability of materials and works, concerned ADE may be consulted.									
vii.	In almost all the cases of transportation of DTRs the consumers themselves are getting the DTRs and other connected material transported to the place of erection why the department is not doing the job of transportation of these items. Further, the people in the departmental shed who attend to the repairs of such DTRs are collecting charges from the consumers.	Instructions are being issued to all the operation SEs to carry out the sick DTR transportation by the departmental vehicles only. In case of non availability of department vehicles on account of prior engagement, the DEs(Opn) were directed to arrange payment for to and fro transport to the consumers.									
viii.	The department has no proper assessment of line loss and revenue loss and the information given by you to the general public is not accurate. You are blaming the agriculture sector for these losses. You are aware that there is a loss of about 9 million units power is lost every month due to defective power supply only in Mahabubnagar district.	<p>TSSPDCL is taking the following measures for reduction of distribution losses</p> <ul style="list-style-type: none"> • Theft control by conducting intensive inspections, • proper categorization of services, • replacement of electromechanical meters with electronic meters, • shifting of meters from inside to outside of the house, • replacement of defective meters on monthly basis, • inspection of UDC and OSL services, • regularization of unauthorized services, 									

		<ul style="list-style-type: none"> • sealing of meters • Meter readings are being taken by IR port meters. <p>It is to submit that agriculture consumption is arrived based on effective implementation of ISI suggested methodology approved by Hon'ble TSERC in TSSPDCL. Distribution losses are arrived based on recorded metered sales of both LT and HT services as per Energy Billing System, HT services data base and assessed Agl. Consumption as per ISI Methodology. The Energy Audit of Town and Mandal Head Quarter feeders at 11kV level is being carried out every month to find abnormal loss feeders. Apart from this Energy Audit of 33kV and 11kV Industrial feeders is being carried out on monthly basis.</p> <p>Hence, there is no discrepancy in the calculation of transmission and Distribution losses.</p>
ix.	It is observed that the 400 KV high tension power towers laid from Srisailam to Hyderabad via dindi-chadrayangutta are of inferior / substandard quality when compared with the existing old 200KV power high tension towers from Srisailam to Hyderabad. Why it is so?. if you want to check what I said you can get the vedio of the towers for comparison etc. further, on 8.4.2017 it is reported in Eenadu telugu daily main paper that near Dhannur B Village, BOdhan Mandal, Adilabad district a power grid 765 KV high tension tower relating to power supply from Chattisgarh to Telangana state collapsed all of sudden. What action is beign taken in such cases of substandard construction of towers and laying of power cables.	The 400kV Transmission lines are constructed duly following the relevant IEC/ARE standards. Also, the works are taken up as per the technical specifications of TSTRANSCO which are formulated based on the guidelines of CEA (Central Electricity Authority) and CBIP (Central Board of Irrigation and Power). The materials required in the execution of the Transmission line are cleared for dispatch from the vendors only after conducting necessary tests as per the Standards and manufacturing quality plan. In this regard, it is to inform that 400kV Srisailam- Mamidipally line was commissioned in June'2000 and the line is in service. There are no complaints/faults on this line so far. However, if any reports are available, it may be sent to this office for examination and taking further action. The subject tower pertains to 765kV line from Wardha to Nizamabad, Telangana State. This line pertains to PGCIL.
x.	Maintenance of sub-station is done very poorly and not on regular basis resulting in breakdowns and repairs due to which the consumers are to put to lot of hardship.this is happening due to the negligence of higher authorities, lack of proper supervision over the lower level officials and also the concern staff not having proper understanding of their job profiles.	Maintenance of substations is being carried as per the Periodical maintenance schedule. TRE and Protection wings are continuously attending the maintenance works and is being reviewed by Higher officials.
xi.	The department is taking unskilled people as operators for the	Instructions were issued to the Field Offices that to arrange for paper

	new sub-stations on outsourcing basis. Unofficially, about Rs. 1-2 Lakhs are being collected from such outsourced personnel by the electrical contractors, ADE and DE. This is resulting in corruption, hiring of inexperienced and unskilled personnel resulting in improper maintenance of sub-stations and interrupted power supply to the consumers.	publication while manning the newly charged Sub-Stations and also to follow the rule of reservation while engaging Contract Labour for executing Sub-Station operator works with the minimum qualification of I.T.I.
xii.	The collection of old dues from the consumers in villages is not taken seriously and the dues are pending for years together. They are not pursued by the officials. The intelligent consumer gets the meter declared as either burnt or not functioning for some reason or the other and the department will keep his account in Bill stop mode. The consumer gets a new connection and carries on his work without paying his dues on burnt meter. Such kind of activity is resulting in loss to tune of Crores of rupees to the Government.	It is to state that the IR/IRDA port meters are fixed for 71% of LT services in rural circles and 90% of such services are being issued regular CC bills with IR meter readings. Further 100% of monthly demand is being collected without any shortfall. All the struck-up / burnt meters have been replaced immediately and long pending UDC service will be transferred to Bill Stopped Status after inspection of consumer premises by the field staff only. No new service connection will be released, if any bill stopped service is existing in the premises with outstanding dues. Hence, there is no revenue loss to TSSPDCL.
xiii.	The Government should immediately take steps to settle the issue of Andhra employees who are on the payrolls of TS Govt. and not entrusted with any work and send them to their state or else make them to work in TS till their cases are settled. Continuing these employees of Andhra resulting in unnecessary payment of salaries by the TS Government.	In this regard, TSSPDCL is following the orders of Honble Supreme court.
xiv.	It is observed that your officials are laying LT lines through the lands of farmers to the advantage of some and disadvantage to other farmers. Further, the HT lines are going over and above the LT lines through the farmers' lands. It is resulting in loss of area in the farm for cultivation and also proving dangerous to the farmers and other sometimes resulting in loss of life. This matter was brought to the notice of the ERC authorities but no action was taken in this direction.	Lines are being laid as per the provisions made in the Electricity Act.
xv.	There are some sub-stations sanctioned in Kodangal constituency, but no work has been commenced so far. Especially in my village Husnabad, Kondal mandal. Action may be taken immediately to start the work of sub-stations.	Total No. of SS existing in Kodangal constituency -20 nos. Estimate sanctions available for erection of new 33/11 KV SS -6 Nos. and works are under progress. Substation estimates pending for sanction - 5 Nos.

S.No.	Summary of Objections / Suggestions	Response of the Licensee												
14. M.Venu Kumar,GM-O&M, M/s. Sitapuram Power Limited, (H.T SC No: NIG-543), Dondapadu, Suryapet District, Telangana- 508246. Ph:- 9866658784 Corporate Office Address:- 8-2-293/82/A/431/A, Road No: 22, Jubilee Hills, Hyderabad-500 033.														
i	<p>The Demand and Energy charges for drawl of by Captive Power is being charged as per Tariff under HT Category-II – others. Power plants maintain Contract Demand with the Distribution Licensee to meet its power requirement during Start Up which happens on occasional basis. However Demand charges are being paid on Monthly basis whether or not supply from Distribution Licensee is availed or not. We humbly pray to the commission for revisiting the demand charges to be paid towards contract demand maintained by power plants.</p>	<p>As per the Tariff Order issued by TSERC, the consumer is categorized under HT-II(Others) Category and following are the Tariffs applicable for HT-II(Others) Category consumers.</p> <table border="1" data-bbox="1346 418 2091 651"> <thead> <tr> <th>Voltage</th> <th>Demand Charges (Rs/kVA/Month)</th> <th>Energy Charges Rs/kVAh</th> </tr> </thead> <tbody> <tr> <td>11 KV</td> <td>390</td> <td>7.80</td> </tr> <tr> <td>33 KV</td> <td>390</td> <td>7.00</td> </tr> <tr> <td>132 KV</td> <td>390</td> <td>6.80</td> </tr> </tbody> </table> <p>The Billing demand shall be the maximum demand recorded during the month or 80% of the CMD whichever is higher. Energy Charges will be billed based on the basis of actual energy consumption or 25 kVAh per kVA of billing demand, whichever is higher.</p>	Voltage	Demand Charges (Rs/kVA/Month)	Energy Charges Rs/kVAh	11 KV	390	7.80	33 KV	390	7.00	132 KV	390	6.80
Voltage	Demand Charges (Rs/kVA/Month)	Energy Charges Rs/kVAh												
11 KV	390	7.80												
33 KV	390	7.00												
132 KV	390	6.80												
ii.	<p>Hon’ble Maharashtra Electricity Regulatory Commission had approved in its Tariff Order (Case No 48 of 2016) the demand charges to be paid by power plant shall be 25% of the rate approved for HT Industry category. Extract is reproduced below: “Start –up power supply is required by Generating Units before COD during their synchronization with Grid, and after COD to restart generation after planned and/or forced shutdowns. Such ‘start-up’ power supply is essential for Generating units, though utilized infrequently. However, the Generating unit is required to take a supply connection from the Distribution Licensee for such infrequent occasion, and to pay Demand Charges on monthly basis irrespective of whether or not the supply from the Distribution Licensee is actually availed or not. Objection on TSSPDCL proposed Tariff:- TSSPDCL has proposed to charge Demand and Energy charges</p>	<p>The Discom shall be in a position to meet the total demand of its consumers all the time. Therefore Discom has to enter in to agreements with the Various generators for supplying the required CMD to the Consumer always and the Discom has to pay the fixed charges to Generators even if the Discom doesn’t utilise the power. Hence to recover these fixed charges Discom is levying the minimum demand charges at 80% of CMD on the consumers.</p>												

<p>for Contract Demand maintained by Power plant at 100% of Tariff as charged to HT category-II- Others we propose the Demand charges towards contract demand maintained by Power plants for meeting start up requirements should be charged at 25% of the Demand Charges of HT category-II others.</p>	
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S.No.	Summary of Objections / Suggestions	Response of the Licensee
15. Gurijala Srinivas Reddy, Jakkapur, Siddipet(Rural), Siddipet- 502276, Mobile No. 9441247367		
i	కరెంటు కొరకు DD లు కట్టి ఇప్పటికీ 6 నెలలు దాటింది నెలక్రిందట ట్రాన్సుఫార్మర్లు వచ్చాయి కానీ భావలకు కనెక్షన్ ఇవ్వలేదు	అగ్రికల్చరల్ సర్వీసులు దరఖాస్తు దారుల సీనియారిటీ ప్రకారంగా ఇస్తున్నారు. కనెక్షన్ ఇవ్వడానికి కావలసిన మెటీరియల్స్ డ్రా చేసి, ట్రాన్స్ఫార్మర్ కనెక్షన్ ఇచ్చి సర్వీస్ కనెక్షన్ ఇస్తారు
ii.	కరెంటు పోల్స్ తేవడానికి రవాణ రైతులదే, పోల్స్ గుంతలు త్రవ్వినందుకు గుంతకు 700 /- రూ ల చొప్పున కచ్చితంగా వసూలు చేయడం జరిగింది. కరెంటు పోల్స్ రవాణాలో వ్యక్తుల ప్రమాదం జరిగిన పరిహారం ఇవ్వడం లేదు (1 సం క్రితం ఒక వ్యక్తి ప్రాణాలు కోల్పోవడం జరిగింది. 1 -3 -2017 రోజున వ్యక్తి అంగ వైకల్యం జరిగింది).	DTR ఏర్పాటు చేయు పనులు మరియు మెటీరియల్స్ రవాణా, డిపార్టుమెంటు వారు నియమించిన కాంట్రాక్టర్స్ మాత్రమే చేయవలెను.
iii.	ట్రాన్సుఫార్మర్ మీద ఓవర్ లోడ్ ఉన్నప్పటికీ కొత్త ట్రాన్సుఫార్మర్లు వేయకపోవడం, లంచాలు ఇచ్చిన వారికి కొత్త ట్రాన్సుఫార్మర్లు ఇవ్వడం.	ట్రాన్సుఫార్మర్లు 80% కు మించి ఓవర్ లోడ్ అయినవి స్థానిక అధికారుల దృష్టికి వచ్చిన యెడల తగిన చర్యలు చేసుకొనడం జరుగుతుంది.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
16. L. Manik Reddy, pulapalli, Nawazpet, Vikarabad- 501101, Mpb:- 9849127346		
i	మాదిరెడ్డి పల్లి, పూలపల్లి, యెల్లకొండ మొదలైన గ్రామాలలో ట్రాన్సుఫార్మర్ల దొంగతనంలు జరిగి తిరిగి ట్రాన్సుఫార్మర్లు ఏర్పాటు చేయుటలో జాప్యం కారణంగా రైతులు పంటలు నష్టపోయినారు.	దొంగతనము కాబడిన డి టీ అర్ స్థానములో వేరొక డి టీ అర్ ను ఏర్పాటు చేయుచున్నాము. మాది రెడ్డి పల్లి లో 2016-17 సంవత్సరములో 4no డిటీఅర్ లు దొంగలింపబడినవి. పూలపల్లి లో 2016 - 17 సంవత్సరములో 5no డి టీ అర్ లు దొంగలింపబడినవి. యెల్ల కొండా లో 2016 - 17 సంవత్సరములో 9 no డి టీ అర్ లు. వీటి స్థానంలో వేరే డి టీ అర్ లు ఏర్పాటు చేయడమైనవిచెడిపోయిన DTR లను మార్పడం లో ఎటువంటి జాప్యము జరగడం లేదు.
ii.	అనేక గ్రామాలలో ట్రాన్సుఫార్మర్ల వద్ద ఆన్ ఆఫ్ స్విచ్లు లేవు. అందుచేత వెంటనే ఏర్పాటు చేయాలి.	ఏ బీ స్విచ్లు లేని స్థానములో కొత్తవి ఏర్పాటు చేయు చున్నాము. 2016 - 17 సంవత్సరములో వికారాబాద్ డివిజన్ పరిధిలో 144 no ఏ బీ స్విచ్లు లేని చోట కొత్తవి ఏర్పాటు చేయబడినవి.
iii.	ప్రతి ట్రాన్సుఫార్మర్ చుట్టూ ప్రమాదాల నివారణల కొరకు ముళ్ల కంచెలు ఏర్పాటు చేయాలి	బహిరంగ ప్రదేశాలలో డి టీ అర్ చుట్టూ రక్షణ కంచె ఏర్పాటు చేయుచున్నాము. DTRs ని భూమికి 6 అడుగుల ఎత్తు గల దిమ్మల పై మరియు పోల్ నిర్మాణాల పై ఏర్పాటు చేయుచున్నాము.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
17. K. Amba Reddy, Vikarabad, pincode:- 501101, ph:- 9704503176.		
i	ప్రతి గ్రామాలలో DD చెల్లించిన రైతులకు స్థంబాలు వైరులు డిపార్టుమెంటు వారే బిగించాలి.	ప్రస్తుతం స్థంబాలు మరియు వైర్లు డిపార్టుమెంట్ వారే కాంట్రాక్టు ఇచ్చి పనులు చేయిస్తున్నారు
ii.	రైతుల నుండి మెటీరియల్ అనగా స్థంబాలు, ట్రాన్సుఫార్మర్లు, ట్రాన్సుఫార్మర్ దిమ్మెలను నిర్మించే ఖర్చులు రైతుల వద్ద వసూలు చేయుటను వెంటనే నిలిపివేయాలి. డిపార్టుమెంటు వారే భరించాలి.	DTR ఏర్పాటు చేయు పనులు మరియు మెటీరియల్స్ రవాణా డిపార్టుమెంటు వారు నియమించిన కాంట్రాక్టర్స్ మాత్రమే చేయవలెను
iii.	ప్రతి గ్రామంలో ట్రాన్సుఫార్మర్ పై టోల్ ప్రీ నెం విధిగా వ్రాసియుంచాలి ఊరి ట్రాన్సుఫార్మర్ వద్ద మరియు రైతు మోటరు వద్ద విధిగా ఎర్టింగ్ వైరు ఏర్పాటు చేయాలి.	మీరు చెప్పిన సూచన పరిశీలించబడును. ప్రతి గ్రామ పంచాయతీ కార్యాలయం వద్ద టోల్ ప్రీ నెంబర్ మరియు అధికారుల నంబర్లు వ్రాసి ఉంచబడినది. ట్రాన్సుఫార్మర్ వద్ద ఎర్టింగ్ డిస్కామ్ వారు ఏర్పాటు చేయుచున్నారు. వినియోగదారుని మోటార్ దగ్గర ఎర్టింగ్ ను వినియోగదారుడే ఏర్పాటు చేసుకోవలెను.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
18. Gajender , nagarkunta, shabad, Rangareddy, pincode: 509217, ph:- 9866151825..		
i	షాబాద్ మండలం నాగర్ కుంట గ్రామంలో సెంచోని బావి వద్ద ఏర్పాటు చేసిన 100 KVA ట్రాన్సుఫార్మర్ నిర్వాహణ లోపం వల్ల ప్రమాద కరంగా ఉంది. విషయాన్ని అధికారులకు చెప్పినా సరిచేయడం లేదు.	షాబాద్ మండలం నాగరకుంట గ్రామంలో సెంచోని బావి వద్ద ఏర్పాటు చేసిన 100 KVA ట్రాన్సుఫార్మర్ కు ఏ బీ స్వీచ్ ఏర్పాటు చేసాము.
ii.	నాగర్ కుంట గ్రామంలో గ్రామావసరాల కోసం ఏర్పాటు చేసిన ట్రాన్సుఫార్మర్ కు అర్ద సరైన విధంగా ఏర్పాటు చేయలేదు. దీంతో విద్యుత్ ఉపకరణాలు కాలిపోతున్నాయి.	షాబాద్ మండలంలో 326 ట్రాన్సుఫార్మర్ ల కు ఎర్డింగ్ ఏర్పాటు చేసాము మరియు నాగరకుంట గ్రామంలో 3 ట్రాన్సుఫార్మర్ ల కు ఎర్డింగ్ ఏర్పాటు చేసాము.
iii.	షాబాద్ మండలం చెర్లగూడ గ్రామ రైతు ఇంటి అవసరాలకు ఉన్న కనెక్షన్ కమర్షియల్ గా మార్చి సదరు రైతు నుండి ఎక్కువ బిల్లు వసూలు చేస్తున్నారు. దానిని మార్చమని అధికారిని కోరినా చేయడం లేదు.	కరెంటు ఇంటి అవసరాలకు కాకుండా దేనికైనా వాడితే నాస్-డొమెస్టిక్ క్రిందకు వస్తుంది. క్షేత్ర స్థాయిలో పరిశీలన చేసి దానిని ఇంటికి వాడుకుంటే ఇంటికి వర్తించే బిల్లులు ఇచ్చేలా మార్పుతారు

S.No.	Summary of Objections / Suggestions	Response of the Licensee
19. Narshimulu, Chittigidha, Nawabpet-501101, Mobile No.9666757185		
i.	గౌరవ డిపార్టుమెంటు వాళ్ళు చేయాలిసిన పనులు అన్ని రైతులతో చేయిస్తున్నారు, ప్రమాదములు జరిగినపుడు వారికి ఎలాంటి భీమా వర్తించటంలేదు. అందుచే ప్రమాదాలు జరిగితే డిపార్టుమెంటు భాద్యత వహించాలి.	విద్యుత్ లైను డి టీ అర్ ల పై చేయవలసిన పనులను తగు జాగ్రత్తలు తీసుకొని విద్యుత్ సిబ్బంది చేస్తున్నారు. రైతులు లైను మరియు డి టీ అర్ ల వద్ద పని చేయరాదు. ఒక వేళ యాక్సిడెంట్ అయినచో ఎక్స్ గ్రేషియా వారి వారసులకు చెల్లించుచున్నాము.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
20. K. Malreddy, kotttagadi, Vikarabad, pincode:-501101, ph:- 9505502440		
i.	కొత్త కనెక్షన్ ల కొరకు DD లు యిచ్చిన్నప్పటికీ ఇవ్వాలైన స్తంభాలు వైర్లు సమయానికి ఇవ్వటం లేదు.	ప్రస్తుతం స్తంభాలు మరియు వైర్లు డిపార్టుమెంట్ వారే కాంట్రాక్టు ఇచ్చి పనులు చేయిస్తున్నారు
ii.	ట్రాన్సుఫార్మర్ ల వద్ద ఆన్ ఆఫ్ స్విచ్ లు లేక రైతులు కరెంటు షాక్ కు గురిఅవుతున్నారు. కాబట్టి వెంటనే ఆన్ ఆఫ్ స్విచ్ లు అమర్చగలరు.	ఏ బీ స్విచులు లేని డీ టీ అర్ లకు ఏ బీ స్విచు లను ఏర్పాటు చేయుచున్నాము. 11,939 nos ఏ బీ స్విచులు TSSPDCL లో 2017 మార్చ్ వరకు ఏర్పాటు చేయడమైనది.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
21. S. Anjaneyulu, mallayapalli, Dubbak, Siddipet, pincode:- 502108 ph:- 9032605545		
i.	చెల్లాపురం నుండి మల్లాయ పల్లెకు మట్టోనిగుండ వస్తున్న ఫీడర్ ఛానల్ కు 6 ట్రాన్స్ఫారం లకు ఒకే ఫీడర్ దాదాపుగా 1 కిలో మీటర్ దూరంలో ఏర్పాటు చేసారు. 1, 2 ట్రాన్స్ఫార్మర్ లకు ఏర్పాటు చేయాలి.	హెచ్ ఏ డి ఎస్ లో మదర్ డి టీ అర్ కు మాత్రమే ఏ బీ స్విచ్ ఏర్పాటు చేస్తాము, 1,2 డి టీ అర్ లకు కలిపి ఒక్కటి ఏ బీ స్విచ్ ఏర్పాటు చేయమని మీరు ఇచ్చిన సలహా పరిశీలించబడును.
ii.	హబ్స్పూర్ లో తీగలు క్రిందికి ఉన్నాయి.	డీ యెస్ అర్ డ్రైవ్ (Distribution Network Rectification Drive) క్రింద తీగలు సరిచేయుచున్నాము.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
22. D. Ramoji, Nallkunta, G2- Rajput Residence Hyderabad. Ph:- 9441901736		
i.	లైసెంస్ పనులు - విధులు ఏమిటి.	<p>వివిధ వర్కర్స్ కోసం, ఆపరేషన్ అండ్ మెయింటనెన్సు అండ్ లైన్స్, సబ్ స్ట్రక్షన్లు, డిస్ట్రిబ్యూషన్, ఎంఆర్డి / టిఆర్ఇ మొదలైన వాటిలో పాటించవలసిన నియమాలు, విధులు మరియు బాధ్యతలను BP (P & G-Per) Ms.No.94, D.31.05 .1994 నందు పొందుపరచడం జరిగింది. దీని ప్రకారం లైసెంస్ బాధ్యత లను క్రింది తెలుపడమైనది</p> <ol style="list-style-type: none"> 1 తన ప్రాంతంలో పారిశ్రామిక మరియు హై వేల్యూ కాకుండా మిగిలిన ఇతర సర్వీసులను రిలీజు చేయడం . 2 తన ప్రాంతంలో అన్ని EHT, HT మరియు LT లైన్స్ యొక్క పాట్రోలింగ్ మరియు నిర్వహణ, ప్రత్యక్ష టాపింగ్స్, దొంగతనం / దుర్వినియోగం యొక్క అనుమానిత కేసుల తక్షణ నివేదన 3 ట్రాన్స్ఫార్మర్స్ మరియు నిర్మాణాలు, EHT, HT & LT లైన్స్ - నిర్మాణం మరియు నిర్వహణ. 4 అతని కింద ఉన్న ALM / హెల్పర్స్ పనులను పరిశీలించడం మరియు అన్ని వినియోగదారులకు మెరుగైన సేవలను అందించడానికి తోడుపడడం.
ii.	CGRF - 2 ఏన్నీ సమావేశాలు జరిగినవి పరిష్కరించిన వివరాలు ఏమిటి.	<p>CGRF – II వారు పొందు పరిచిన సమాధానము క్రింద పేర్కొనబడినది</p> <p>-“గత ఆర్థిక సంవత్సరం 2015-16 మరియు 2016-17 వరకు నమోదైన ఫిర్యాదులు మరియు పరిష్కరించిన వారి వివరములు అనుబంధం -I A మరియు I B ఇవ్వడమైనది</p>
iii.	రైతులు ఎంత మంది విద్యుత్ ప్రమాదవశాత్తు చనిపోయారు - అందించిన తక్షణ సహాయము వివరాలు తెలపండి	<p>2016-17 లో 89 మంది విద్యుత్ ప్రమాదవశాత్తు చనిపోయారు. డాక్యుమెంట్స్ ఇచ్చిన 53 మందికి తక్షణ సహాయము అందించాము.</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
23. D. Anji Reddy, Sangareddy ph:- 9989334612		
i.	తీగలుక్రిందికివున్నవి	2016-17 లో 15655 స్పాన్స్ లో తీగలను సరిచేసాము. ఇంకా ఎక్కడైనా లూజ్ లైన్లు ఉంటే సరిచేస్తాము.
ii.	వంగినస్తంభాలు	2016-17 లో 3370 వంగిన స్తంభాలు సరిచేసాము ఇంకా ఎక్కడైనా వంగిన స్తంభాలు ఉంటే సరిచేస్తాము.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
24. Venkatesh, Nawazpet, Vikarabad, pincode:- 501111, ph:- 8465096271		
i.	ప్రతి గ్రామంలో కరెంటు వైరులు వేలాడుతున్నాయి వర్షాకాలంకు ముందే వరిగిన స్తంభాలు లూజ్ వైరులు వెంటనే సరిచేయా లి.	సీస్టి మేసెర్స్ క్రింద 2017-18 కి గాను 45 కోట్ల రూపాయల బడ్జెట్ ఇవ్వడమైనది.2016-17 లో TSSPDCL లో 2017 మార్చ్ వరకు 41.81 కోట్లు ఖర్చు పెట్టడం జరిగినది. ఎక్కడైనా లూస్ లైనులు ఉన్నవని తెలియబడినప్పుడు వాటిని సరిచేయుచున్నాము విరిగిన స్తంభాలు 19,463 nos 2017 లో మార్చడమైనది. మార్చ్, ఏప్రిల్ & మే నెలల్లో లూజ్ లైనులు, విరిగిన స్తంభాలు గుర్తించుట కొరకు ప్రత్యేక కారిక్రమము నిర్వహించి వాటిని రెక్టిఫై చేయుచున్నాము.
ii.	ప్రతి గ్రామానికి లైసెంస్ రైతులకు అందుబాటులో యుండాలి. సిబ్బంది లేని కారణంచే స్వంతగా రిపేర్లు చేయబోయి అనేక మంది రైతులు ప్రాణం పోగొట్టుకుంటున్నారు.	ఆపరేషన్ సెక్షన్కు కు లైసెన్స్ / అసిస్టెంట్ లైసెన్స్ / జూనియర్ లైసెన్స్ పోస్టులను నిబంధనల ప్రకారం మాత్రమే మంజూరు చేయడం జరుగుతున్నది. ఎక్కడైనా పోస్టులు ఖాళీలు ఉన్నచో దశలవారీగా నియామకాలు చేపట్టడం జరుగుతున్నది. అంతకు మించి కాంట్రాక్టు లేబర్సును కూడా వినియోగించడం జరుగుతున్నది. కనుక రైతులను పోల్స్ ఎక్కడము మరియు ట్రాన్సుఫార్మర్లు రిపేరు చేయడము వంటివి చేయవద్దని కోరుచున్నాము.
iii.	DD చెల్లించి సం ల తరబడి పెండింగ్ లో యున్న రైతులకు తక్షణమే సర్వీసు కనెక్షన్ ఏర్పాటు చేయాలి, డిపార్ట్మెంట్ ద్వారానే పనులు జరిపించాలి.	అగ్రికల్చరల్ సర్వీసులు దరఖాస్తు దారుల సీనియారిటీ ప్రకారంగా ఇస్తున్నారు. కనెక్షన్ ఇవ్వడానికి కావలసిన మెటీరియల్స్ డ్రా చేసి, ట్రాన్స్ఫార్మర్ కనెక్షన్ ఇచ్చి సర్వీస్ కనెక్షన్ ఇస్తారు ప్రస్తుతం స్తంభాలు మరియు వైర్లు డిపార్ట్మెంట్ వారే కాంట్రాక్టు ఇచ్చి పనులు చేయిస్తున్నారు

S.No.	Summary of Objections / Suggestions	Response of the Licensee
25.	Commissioner, GHMC, Tank band, Hyderabad.	
	<p>Under the existing and also the proposed Retail Supply Tariff Schedule, the services of Crematoriums are billed under HT-II in the absence of such services not defined under any particular category.</p> <p>In this regard, it is informed that under the existing tariff, the note to HT-II reads as follow :</p> <p><i>“Note: In respect of Government controlled Auditoriums and Theatres run by public charitable institutions for purpose of propagation of art and culture which are not let out with a profit motive and in respect of other Public Charitable Institutions rendering totally free service to the general public, the overall kVAh rate (including customer charges) may be limited to the tariff rates under LT-VII: General purpose, in specific cases as decided by the Licensee.”</i></p> <p>In view of above provision in the Tariff, we request the Regulatory Commission and TSSPDCL to consider the Crematorium services under the above definition and the proposed definition may be considered as given below :</p> <p><i>“Note: In respect of Government controlled Auditoriums and Theatres run by public charitable institutions for purpose of propagation of art and culture which are not let out with a profit motive and in respect of other Public Charitable Institutions rendering totally free service to the general public and the Crematoriums operated and maintained by the local bodies, the overall kVAh rate (including customer charges) may be limited to the tariff rates under LT-VII: General purpose, in specific cases as decided by the Licensee.”</i></p> <p>Therefore, we request you to consider the above positively and issue necessary orders in the Tariff Order.</p>	<p>The proposal may be considered by the Honble Commission.</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
26.	T. Sri Ranga Rao, 503, Srilaxmi solitude 2-2-18/18/7, DD Colony Hyderabad- 500013	
27.	M. Sirdhar Reddy, 504, Rajput Residency 2-1-174,175, Nallakunta Hyde-500044 ph:- 9866381090	
1.	<p>ప్రభుత్వం నిర్ణయం చేసిన 3-మోటార్ల నిబంధనను ఎత్తివేసి (మెట్ట, మాగాణి, 2.50 ఎకరాల నీటి పారుదల కన్నా ఎక్కువ ఉంటే ఉచిత విద్యుత్ వర్తించదు అనే నిబంధన ఎత్తివేత మరియు 12 గంటల విద్యుత్ సరఫరా నిర్ణయం వీలైతే 24 గంటల విద్యుత్ సరఫరా నిర్ణయం అభినందించవలసిన, ఆహ్వానించవలసిన విషయాలు గౌరవ కమీషన్ మరియు డిస్కం ల ద్వారా ప్రభుత్వానికి మరియు డిస్కంలకు పై నిర్ణయాలపై కృతజ్ఞతతో కూడిన ధన్యవాదాలు తెలంగాణ రైతాంగం తరపున మరియు భారతీయ కిసాన్ సంఘం తెలంగాణ తరపున తెలియ జేసుకుంటున్నాం. ప్రస్తుత ఆర్థిక సంవత్సరానికి విద్యుత్ చార్జీల పెంపుదల లేనందుకు కూడా తమరి ద్వారా ప్రభుత్వానికి, Discom వారికి ధన్యవాదాలు తెలియ జేసుకుంటున్నాం.</p>	-
2.	<p>రాష్ట్రంలో ఉన్న 4-CGRF లు ఎన్ని ఫిర్యాదులు సేకరించినవి, వాటిలో ఎన్ని పరిష్కరించినవి గత ఆర్థిక సంవత్సరం 1 April 2015 నుండి 31 March 2016 మరియు 1 April 2016 నుండి 31 March 2017 వరకు వివరాలు తెలియ జేయగలరు. 4 CGRF వినియోగదారుల సభ్యుల హాజరు వారికి చెల్లించిన, చెల్లించ వలసిన పైకం వివరాలు పై రెండు ఆర్థిక సంవత్సరాలకు తెలియ జేయగలరు. 4 CGRF ల Chairman హాజరు మరియు వారు పొందిన ఆర్థిక లబ్ధి, అన్ని రకాలవి కూడా పై రెండు ఆర్థిక సంవత్సరాలకు తెలియజేయగలరు. రాష్ట్రంలో 4-CGRF లు ఏ CGRF నెలలో ఎన్ని హియరింగులు నిర్వహించారో 2 ఆర్థిక సంవత్సరాల వివరాలు తెలియజేయగలరు.</p>	<p>CGRF – I వారు పొందు పరిచిన సమాధానము క్రింద పేర్కొనబడినది</p> <ul style="list-style-type: none"> “గత ఆర్థిక సంవత్సరం 2015-16 మరియు 2016-17 వరకు నమోదైన ఫిర్యాదులు మరియు పరిష్కరించిన వారి వివరములు అనుబంధం -I A మరియు I B ఇవ్వడమైనది CGRF వినియోగదారుల సభ్యుల హాజరు వారికి చెల్లించిన పైకం వివరాలు అనుబంధం -II లో ఇవ్వడమైనది Chairman హాజరు మరియు వారు పొందిన ఆర్థిక లబ్ధి వివరాలు అనుబంధం -III లో ఇవ్వడమైనది <p>CGRF – II వారు పొందు పరిచిన సమాధానము క్రింద పేర్కొనబడినది</p>

		-“గత ఆర్థిక సంవత్సరం 2015-16 మరియు 2016-17 వరకు నమోదైన ఫిర్యాదులు మరియు పరిష్కరించిన వారి వివరములు అనుబంధం -IV A మరియు IV B ఇవ్వడమైనది
3.	TSSPDCL లోని CGRF-I గతంలో పని చేసినంత చురుకుగా పని చేస్తున్నట్లుగా లేదు. కావున 3 మాసాలకోసారి డిస్కం స్థాయిలో మరియు TSERC స్థాయిలో కూడా సమీక్షలు నిర్వహించి వీరి పనితీరును మెరుగుపర్చ వలసిందిగా గౌరవ కమిషన్ మరియు డిస్కం ఉన్నతాధికారులను కోరుచున్నాము.	గౌరవనీయ కమిషన్ పరిధి లోని అంశం
4.	TSSPDCL మరియు TSNPDCL కు సంబంధించిన వినియోగదారుల సభ్యులను వారు పని చేస్తున్న CGRF ల నుండి ఇతర CGRF లకు మార్పు (ట్రాన్స్ఫర్) చేసి CGRF ల పనితీరును మెరుగుపర్చవలసిందిగా కోరుచున్నాము. TSNPDCLకు సంబంధించిన నిర్మల్ కేంద్రంగా ఉన్న CGRF చైర్మన్ గా పనితీరు వ్యవహార శైలి వినియోగదారులకే సంతృప్తిగా లేనందున వీరిని తొలగించాలని తమరిని కోరుచున్నాము.	గౌరవనీయ కమిషన్ పరిధి లోని అంశం
5.	ఒక రైతుకు 3 కనెక్షన్ల కన్నా ఎక్కువ ఉన్నా ఉచిత కరెంట్ వర్తిస్తుందని తెలిపారు. భూగర్భ జలాలు అడుగంటుతున్న కారణంగా 3-phase మోటార్లకు సరిపోయేంత నీరు లేని కారణంగా సింగల్ ఫేజ్ మోటార్లు అమర్చుకొని అందుబాటులో ఉన్న తక్కువ నీటిని తోనే వ్యవసాయం చేసుకొవాల్సిన సందర్భంగా సింగల్ phase మోటారును అమర్చుకోవడానికి అనుమతించ వలసిందిగా కమిషన్ వారిని కోరుచున్నాము.	సింగల్ phase మోటారు తో ఎక్కువ లోతులో వున్నా నీటిని పంప్ చేయడం కష్టతరం మరియు మోటార్లు కాలిపోయే అవకాశము ఎక్కువ.
6.	అప్పుట్లో ఊగి సంక్షోభంలో ఉన్న డిస్కంలో అంతర్గత సామర్థ్యాన్ని పెంపు చేసి తమ ఆర్థిక పరిస్థితి మెరుగు పర్చుకుంటుందా, ప్రభుత్వ సలహా మేరకు విద్యుత్ టారిఫ్ పెంపుతో ఆర్థిక సంక్షోభం నుండి బయట పడే అవకాశాన్ని డిస్కంలు కోల్పోయినవి.	డిస్కామ్ వారి నష్టాలను మరియు రుణాలను ప్రభుత్వం వారు FRP మరియు UDAY స్కీముల ద్వారా తీసుకోవడం జరిగినది.

	కాలానుగుణంగా పెంచవలసిన టారిఫ్ పెంచకపోవడం క్యాటగిరీలకు రాజకీయ_గత 10 సంవత్సరాల నుండి పెంచకపోవడం వలన డిస్కంలు పెంపు ప్రతిపాదించగా పోవడం వలన డిస్కం లు నష్టాలకు గురై అమ్మో, ప్రైవేట్ అయ్యే అవకాశం ఉంది.	
7.	గత సంవత్సరం బహిరంగ విచారణలో సిద్ధిపేట ప్రాంతంలో (గుర్రాలగొంది) గ్రామ రైతు ప్రభాకర్ రెడ్డి విద్యుత్ వల్ల ట్రాన్స్ పోర్ట్ చేస్తున్న ట్రాక్టర్ తిరగబడి చెనిపోయిన దానిపై DISCOM తీసుకున్న చర్యలు లేంటి, వరంగల్ జిల్లాలో విద్యుత్ పోల్ ను నిలబెట్టే క్రమంలో ఒక రైతు చనిపోయాడు. దాని పై తీసుకున్న చర్యలేంటి అలాగే సిద్ధిపేట లో ఈ సంవత్సరం ట్రాన్స్ పోర్టు చేసే క్రమంలో ఒక చేయిని రైతు కోల్పోవడం జరిగింది. ఎరెక్షన్ కాంట్రాక్టర్ల విధి లేక రైతు విదియా తెలియజేయగలరు. ట్రాన్స్ పోర్టు మరియు ఎరెక్షన్ చేయకుండా అన్ని క్షేత్ర స్థాయి అధికారుల పై కఠిన చర్యలు తీసుకోవాలని కోరుచున్నాము.	విద్యుత్ లైను డి టీ అర్ ల పై చేయవలసిన పనులను తగు జాగ్రత్తలు తీసుకొని విద్యుత్ సిబ్బంది మాత్రమే చేయవలసి ఉన్నది. రైతులు లైను మరియు డి టీ అర్ ల వద్ద పని చేయరాదు. డి టీ అర్ ఎరెక్షన్ మరియు అన్ని లైను పనులు డిపార్ట్మెంట్ ద్వారా నియమించిన కాంట్రాక్టర్లు చేయుదురు.
8.	విద్యుత్ సరఫరాలో అంతరాయం కలిగినప్పుడు (DTR failure) ఎంత సమయంలో డిస్కంల వారు సంబంధిత ప్రాంతానికి సాంకేతిక నిపుణుడిని పంపిస్తారో తెలియ జేయగలరు.	రైతులకు సంబంధించిన ట్రాన్స్ఫార్మర్ కాలిపోయినచో వాటి స్థానంలో కొత్తది/రిపేర్ చేయబడినది 48 గంటల లోపు ఏర్పాటు చేయుచున్నాము.
9.	టోల్ ఫ్రీ నెంబర్లకు ప్రచారంలో తీసుకు వచ్చే చర్యలు ఏమిగైకొన్నారో తెలుపగలరు. టోల్ ఫ్రీ నెంబరుకు ప్రతి DTR పై వ్రాయాలని ప్రతి గ్రామంలో బిల్ కలెక్షన్ సెంటర్ లో వ్రాయాలని గత మూడు సంవత్సరాలుగా తెలియచేస్తున్నాం.	టోల్ ఫ్రీ నెంబర్ల ను గ్రామా పంచాయతీ కార్యాలయంలో వ్రాసి ఉంచబడినది మరియు తరచుగా పత్రికాముఖంగా తెలియపరుచుచున్నాము. DTR పై మరియు బిల్ కలెక్షన్ సెంటర్ లో టోల్ ఫ్రీ నెంబర్ రాయడం గురించి పరిశీలిస్తాము.
10.	విద్యుత్ షాక్ వలన దుర్మరణాలకు సంబంధించిన (ఎక్స్ గ్రేషియా) తక్షణ సహాయం చెల్లింపులు వివక్ష చూపుతున్నారు. గత రెండు ఆర్థిక సంవత్సరాలలో దుర్మరణం చెందిన	గత రెండు ఆర్థిక సంవత్సరాలలో విద్యుత్ షాక్ వలన దుర్మరణం చెందిన వారి సంఖ్య, తక్షణ సహాయం పొందిన వారి సంఖ్య

	<p>వారి సంఖ్య, తక్షణ సహాయం పొందిన వారి సంఖ్య తెలియజేయగలరు. తక్షణ సహాయం పొందిన వారు ఏ కారణం చేత వీరి అప్లికేషన్ రిజెక్ట్ చేసినారో తెలియజేయగలరు. దుర్మరణాలు సంబంధించి తక్షణ సహాయం గురించి గౌరవ కమీషన్ వారికి వివరణ ఇవ్వగలరు.</p>	<table border="0" style="width: 100%; text-align: center;"> <thead> <tr> <th></th> <th>చనిపోయినవారు</th> <th>ఎక్స్‌గ్రేషియా పొందినవారు</th> </tr> </thead> <tbody> <tr> <td>2016 - 17</td> <td>89</td> <td>53</td> </tr> <tr> <td>2015 - 16</td> <td>144</td> <td>112</td> </tr> </tbody> </table> <p>ద్రువపత్రాలు ఇచ్చిన వారికి ఎక్స్‌గ్రేషియా చెల్లింపులు జరిపాము.</p>		చనిపోయినవారు	ఎక్స్‌గ్రేషియా పొందినవారు	2016 - 17	89	53	2015 - 16	144	112
	చనిపోయినవారు	ఎక్స్‌గ్రేషియా పొందినవారు									
2016 - 17	89	53									
2015 - 16	144	112									
11.	<p>APERC రెగ్యులేషన్ 4, 2013 లో వివరించిన DTR వరకు డిస్కంల ఖర్చుపెట్టాలి. DTR తర్వాత మాత్రం వినియోగదారుల సంబంధించి రైతులతో పొందుపర్చాలన్నది 4-2013 రెగ్యులేషన్ వివరిస్తుంది. కానీ క్షేత్ర స్థాయిలో చేసే ఎస్టిమేట్లు DTR యుక్తంగా చేస్తున్నారు. దీనిని నివారించి DTR లేకుండా ఎస్టిమేట్లు చేయాలనీ సిబ్బందికి తెలియజేసి అతిక్రమించిన అధికారుల పై కఠిన చర్యలు తీసుకోవాలని కోరుచున్నాము. కావున 4-2013 రెగ్యులేషన్ అర్థం చేసుకొని వివరం ఇస్తూ తగిన చర్యలు గైకొనాలని కోరుచున్నాము.</p>	<p>DTR మీద లోడ్ ఉన్నంత వరకు ఒక్క LT లైన్ మాత్రమే ఎస్టిమేట్లు వేస్తారు. DTR మీద లోడ్ లేకపోతే కొత్తగా ట్రాన్స్‌ఫార్మర్లు ముందుగా ఎస్టిమేట్ వేసి కనెక్షన్లు ఇవ్వాలి ఉంటుంది. లేనిచో ట్రాన్స్‌ఫార్మర్ మీద భారం పెరిగిపోయి కాలిపోయే ప్రమాదం ఉన్నది. ప్రస్తుతం రైతుకు కనెక్షన్ ఇవ్వటానికి మొత్తం ఖర్చు డిపార్టుమెంటు భరిస్తుంది రైతు మీద ఎలాంటి భారం మోపడంలేదు</p>									

S.No.	Summary of Objections / Suggestions	Response of the Licensee
28. K. Sampath Kumar, Sreenidhi Nilayam, H.No-23-5-523, Lal Darwaza Main Road, Opp. Sri Datta Sai Mandir, Hyd-500065, ph:-7569513732		
I	In South circle, it is complained that the consumers are not paying Electricity Bill amounts regularly as such huge pendency is mounting up.	It is to inform that TSSPDCL is collecting 100% of demand regularly from the consumers of Hyderabad South Circle.
ii.	What are the steps that have been taken to arrest the pilferage at ground level	Monthly 5 nos high loss feeders are being inspected by pooling up of all South Circle staff. Number of criminal cases booked on the consumers who are indulging in theft of energy by direct tapping and tampering of meters. Surprise inspections are also being carried out by vigilance wing. HT & LT high value services consumption pattern is being analysed at corporate office level by DPE analysis wing.
iii.	Did you preferred or made suggestion to religious elders where they are lamping during the festive seasons to put up temperory electric meters as it was done during Ganesh Festive (9) days. What are the steps take by you.	Religious elders are being advised to take temporary supply during the festive seasons by paying the requisite charges.GHMC/R&B departments are paying the temporary supply charges where the temporary lighting is provided by GHMC/R&B departments.
iv.	It is not known, how many times the electricity vigilance officials or your field staff moved in their areas to identify the pilferage/theft of power supply.	On a complaint and on suspected services vigilance wing is inspecting the areas and booking the cases. Surprise inspections are also being carried out by vigilance wing in addition to the inspection being carried out by the local field staff.
v.	As a responsible citizen I gave no of complaints to your department by setting up informants and paid them the money to get such information where several loop holes came to light keeping my life in risk, all these were encashed by your staff. What is your suggestion on this.	-

S.No.	Summary of Objections / Suggestions	Response of the Licensee
29. M.Venugopala Rao, Senior Journalist & Convener, Centre for Power Studies, H.No. 7-1-408 to 413, F 203, Sri Sai Darsan Residency, Balkampet Road, Ameerpet , Hyd- 500016.		
i.	<p>The TS Discoms, in their ARR submissions, have projected requirement of energy of 54756 mu - 38,432.93 mu for TSSPDCL and 16,323.11 mu for TSNPDCL - and availability of 66,076 mu with a surplus of 11,320 mu for the year 2017-18. The surplus works out to 20.67% against the projected requirement. Moreover, availability of 807.31 MW as the share of TS Discoms (53.89%) from the four new IPPs (GVK extension, GMR Vemagiri, Konaseema and Gauthami with a total installed capacity of 1499 MW) is not considered by them in their ARR projections for the year 2017-18 on the ground that natural gas will continue to be unavailable to these projects. As and when supply of natural gas is recommenced to these projects, TS Discoms will get additional 5657.62 mu as their share from these projects with a PLF of 80%. In other words, in such an eventuality, the available surplus will be 16,977 mu or 31% of projected requirement for the year 2017-18. What will the Discoms do with such a huge surplus and how much of it would be backed down is not explained by the Discoms in their ARR proposals. It is reported that Oil and Natural Gas Corporation plans to increase output of natural gas at its Vashishta gas field, located in KG basin, from 1.1 million metric standard cubic meters per day (MMSCMD) to 5 MMSCMD by July this year. The scope for availability of a surplus of 16,977 mu or 31% of projected requirement for both the Discoms for the year 2017-18 confirms that the resource plan submitted by them till the end of 2018-19 has gone awry. Even if some margin is provided for reserve margin or spinning reserve, as the CMD of SPDCL argued before the Commission during the public hearing on ARR and tariff proposals for the year 2016-17, a reserve margin of 31% is prohibitive. Such abnormal</p>	<p>The energy requirement for FY 2017-18 has been projected by the Licensee based on the first half actual sales growth during FY 2016-17 and the past 1 to 5 years Compounded Annual Growth Rate of each category of consumers. The sales growth for Railway Traction, HMR and Lift Irrigation category has been projected based on end-user approach wherein the expected load requirements have been taken from pending applications and data from the concerned departments. The licensee has adopted growth rates considering the present trend and current socio-economic policies. Similarly, the availability of power has been estimated based on the expected PLFs of the running stations and CoDs of the new stations taken from the generating companies. Hence the Discom has made realistic assumptions to the extent of available data and requests the Honble Commission to approve the same.</p> <p>The surplus as reflected in the filings may not be really turn to be absolute surplus in terms of load requirements as there will be lot of uncertainties associated with weather, rainfall etc. in real time scenario that affect the demand and also may differ from the forecasted load demand.</p> <p>Further, the state peak demand currently which is 9191 MW is expected to cross 10000 MW in the coming years with the increase of hours of agriculture supply from 9 hours to 24 hours and start of various lift irrigation schemes by Government of Telangana. It is expected that 7217 MW load requirement is anticipated from energisation of Government Lift Irrigation schemes alone till 2020 based on the data from Irrigation Department. Hence to meet such demands in the near future, it is inevitable to have long term PPAs with the generating companies to avoid any deficit situations as the creation of resources takes 2 to 5 years gestation period.</p> <p>Licensee humbly submits that the new gas based IPPs (GVK Extension,</p>

	<p>surplus would lead to disastrous consequences, resulting in backing down, with installed capacities created remaining stranded proportionately and payment of fixed charges for non-generation under backing down, inability of the Discoms to compete and sell surplus power in the market and ultimately imposing huge and avoidable burdens of consumers of power. How much surplus power the Discoms can sell in the market and at what prices during 2017-18? I once again request the Hon'ble Commission to understand the seriousness of the situation and to direct the Discoms to submit long-term load forecast, resources plan and procurement plan, hold public hearings on the same and give its orders appropriately for orderly development of power sector in terms of purchase of power by the Discoms and ensuring competitive tariffs to consumers. Based on such a determination of requirement of power periodically, approvals for procurement of power from new projects, addition of new installed capacity periodically in consonance with requirement of demand growth determined should be given. Under the resource plan till 2018-19 (end of third control period), the Discoms have projected energy requirement of 61,900 mu and availability of 70,784 mu. In this connection, I would like to bring to the notice of the Hon'ble Commission that APERC had responded to our repeated submissions and directed AP Discoms and AP Transco to submit their long-term load forecast, resource plan and electricity plan for the State, that the latter have already submitted the same covering the balance period for the third control period and fourth control period (from 2019-20 to 2023-24) and that the Commission has already invited comments/views/suggestions from all interested persons and stakeholders and decided to hold a public hearing on 3.6.2017 on the same.</p>	<p>GMR Vemagiri, Konaseema and Gauthami) have not been considered to supply power during FY 2017-18 due to the precedence of non-supply of power in FY 2015-16 and FY 2016-17 despite declaring availability Further the Discom is adhering to the guidelines issued by the Honble Commission in submission of Load Forecast and Resource Plan. The Licensee shall file detailed Load forecast and Resource Plan for the fourth control period (FY 2019-20 to FY 2023-24)and simple plan for the next 5 years as per the timelines issued by the Honble Commission.</p>
ii	SPDCL has projected an overall growth rate of demand for the	The licensee has made realistic assumptions of the sales growth based

	<p>year 2017-18 as 9.42%, with growth rate of 14% for HT category, while NPDCL has projected a growth rate of 26.16% for HT category with an overall growth rate of 12.05%. These projections, on the face of it, and in view growth rates for past years, seem unrealistic and their achievement doubtful. SPDCL has maintained that “it is expected that a substantial portion of open access consumers will come back to the grid.” It has not explained the basis for such optimism. The overall metered sales have come down from 68.60% in 2015-16 to 68.28% in 2016-17, as per the revised estimate made by SPDCL. As per revised estimates for 2016-17, what is the growth rate of demand for Ferro Alloys units, which had shown reduction of demand during 2015-16 due to sluggish market conditions, as explained by the Discom. How many Ferro Alloys units in Telangana are working and how many are continuing to be closed down? The Discoms have informed that 160 applicants are having open access transaction for a quantity of 902 MW in the State. For open access how many applications are pending and for how much load in the State?</p>	<p>on the current and past trend, Policies and projections of the end-users viz. Railways, Metro, Lift Irrigation. While estimating the sales for HT Industrial Category, though negative/meagre growth rates were recorded during 1st half of 2016-17 and past 2 years due to consumers moving out through open access, the licensee presumes that such open access consumers will come back. The underlying assumption is that during R&C periods in the power deficit scenario, more consumers were forced to opt for open access and now that the licensee has assured uninterrupted and reliable power supply to all the consumers, there are high chances that open access sales will reduce. Currently there are 3 Ferro Alloy industries operating in the licensee area. In respect to pending Open access applications, it is to inform that there is no application pending for open access as on this date.</p>
iii	<p>In their ARR submissions for the year 2016-17, projections of sales of power to agriculture are shown as 7185.25 mu (3.6% growth rate) by SPDCL and as 4904.75 mu (3.66% growth rate) by NPDCL. The Discoms had claimed that as per the policy of the Government of Telangana State, they had “ensured to provide 9 Hrs power supply to agriculture consumers from 01.04.2016.” Therefore, the Discoms had further claimed, they had not projected any additional sales due to increase in number of hours of supply due to the decreased water level in the bore wells because of poor rain fall during the current year and that the growth rate for 2016-17 shown by them was “mainly due to release of new agricultural services.” Now, in the ARR proposals for the year 2017-18, SPDCL has shown a</p>	<p>The 21.45% in the ARR proposals for FY 2017-18 is the revised share of Agriculture in the Discom input for FY 2016-17 but not the sales growth of Agriculture. During first half of FY2016-17 a growth of 10.83% is observed on account of release of 54,717Nos of Agricultural service connections in FY2015-16 against the target of 50,000Nos and extension of 9Hrs power supply to agriculture consumers from 01.04.2016 as per the policy of Govt. of Telangana State. Further, the targets set for release of Agriculture Connections for FY2016-17 are 64730Nos, against which 74,946 nos services are released. Hence, a growth rate of 9.50% is adopted in estimation of the sales in H2 of FY2016-17.</p> <p>Considering the per HP consumption for ensuing year to be at same</p>

	<p>revised growth rate of 21.45% and NPDCL has shown a revised growth rate of 6.50% for LT agriculture for the year 2016-17, thereby vastly contradicting their earlier assertions and projections. It has become a standard practice for the Discoms to project inflated agricultural demand and for the Commission to reduce the same and for the Discoms to show revised estimates of higher consumption for agriculture. Genuine criticism is being voiced every year that a part of transmission and distribution losses, including commercial losses, is being included in agricultural consumption. The projected growth rates of 6.50% by SPDCL and 6.50% by NPDCL for agriculture during 2017-18 have to be seen in this background and need to be pruned realistically.</p>	<p>level as that of the current year and keeping in view the increase in number of Agricultural Connections, a realistic growth rate of 6.50% is adopted for projecting the sales in FY2017-18.</p>
iv	<p>In view of the above explained unrealistic and inflated growth rates for demand projected by the Discoms for the year 2017-18, availability of surplus power may turn out to be much more than what the Discoms have projected. I request the Hon'ble Commission to make a realistic assessment of demand growth for the year 2017-18 and determine requirement of power and cost of power purchase by the Discoms accordingly. While the consumers are victims of these disastrous consequences that arise as a result of entering into long-term PPAs indiscriminately to purchase unwarranted power, the powers-that-be who have taken such questionable decisions go scot-free. That shows the need for timely intervention and effective regulatory control.</p>	<p>The licensee has made realistic assumptions on demand and supply side based on the approach as stated in the ARR filings and requests the Honble Commission to consider the same.</p>
v	<p>For purchasing 54,756 mu for the year 2017-18, the Discoms have projected a power purchase cost of Rs.24,421 crore out of which Rs.356 crore is shown as "other cost" to be paid to thermal projects of TS Genco and AP Genco, without explaining what that "other cost" is about and without justifying the same.</p>	<p>The Other costs of Rs251 Cr shown against TSGENCO thermal stations for FY 2017-18 in the TSSPDCL power purchase costs pertains to claim of additional interest on pension bonds by TSGENCO based on its share of 53.89% in the overall claim of Rs. 660 crores.</p>

	<p>In view of availability of the projected surplus of 11,320 mu (16,977 mu), the Discoms have to explain how much of it they are going to back down, obviously on the basis of merit order dispatch, and how much would be the fixed charges they have to pay for such non-generation of power? If TS Discoms are going to back down power from thermal plants of AP Genco and TS Genco, where is the need, as well as justification, for showing payment of Rs.356 crore towards “other cost”?</p>	
vi.	<p>Both the Discoms have projected availability of NCE of 5163 mu for the year 2017-18 (at page 45 of ARR filing of SPDCL; at page 44 it is shown as 4826.81 mu.) It works out to 11.05% of total sales of 46709.70 mu projected by both the Discoms. It is more than double the minimum of 5% NCE the Discoms have to purchase under RPPO issued earlier by the Commission. Rs.4.70 per unit of wind power (397.75 mu) and of Rs.5.84 per unit of solar power (4143.76 mu) are shown by the Discoms as weighted average tariffs. To some of the units of wind power and solar power, the actual tariff is much more. The GoTS has been hasty in going in for solar and wind power on such a higher scale which the Discoms have to purchase on long-term basis as per the PPAs entered into and consented by the Commission. The tariffs for wind and solar power have been coming down through real and transparent competitive bidding. In view of the same, the GoTS should have moved cautiously and gradually in directing the Discoms to enter into long-term PPAs with wind and solar power units. The latest tariff discovered through competitive bidding for solar power is Rs.2.62 per unit, while it is Rs.3.46 per unit for wind power. TS Discoms’ entering into long-term PPAs with solar and wind power units on such a scale and at such higher tariffs is unwarranted and detrimental to long-term interest of consumers of power for the following reasons, among others:</p>	<p>As per Hon’ble State Commission Regulation 1 of 2012, the obligated entities which includes DISCOMS have to purchase RE energy at 5% of the total consumption with a minimum of 0.25% from solar RE generators.</p> <p>In compliance to meet the RPPO target State Government has taken a preservative step to procure power from Solar Power Plants as the Telangana State is one of the suitable locations for installing Solar Power Projects due to the following favorable factors:</p> <ul style="list-style-type: none"> • Availability of about 300 sunny days in a year with solar insolation of 5.5 to 6 KWh/m². • Availability of widespread electric grid network, which facilitate Projects with easy connectivity. • Growing energy demand in the State <p>DISCOMs floated tenders for procurement of solar power under competitive bidding process in transparent mode i.e., through e-procurement platform duly issuing Request for Selection (RfS) inviting developers to participate in the tender process with a wide publicity through electronic media and placing on DISCOMs websites. After thorough evaluation of Technical bid and Financial bid as received in response to RfS, the summary of allocation of tentative list has submitted to the State Government for issue of approval. On receipt of approval from Government and consent from Hon’ble State Commission the Letter of Intent (LoI) were issued to successful bidders and</p>

<p>a) First, to meet a minimum of 5% purchase of NCE under RPPO, there is no need, as well as obligation, for entering into PPAs to purchase NCE by more than 11% of projected sales of the Discoms.</p> <p>b) Second, in view of tariffs for solar and wind power coming down drastically through competitive bidding, entering into long-term PPAs with solar and wind power units to purchase power at very high tariffs is doing long-term harm to the consumers by saddling them with such higher tariffs for the entire period of long-term PPAs.</p> <p>c) Third, in view of substantial availability of surplus power, purchasing solar and wind power at such higher scale and higher cost on long-term basis, leading to increase in availability of substantial surplus power is imprudent.</p>	<p>subsequently Power Purchase Agreement (PPA) were entered with individual Solar Power Developers with a tariff as discovered through competitive bidding as and then which is the lowest tariff, as the new technologies are being improved day to day the cost of Solar panels coming down and the so the rate per unit from solar plants are decreasing.</p> <p>The RPPO is the minimum percentage of obligation to procure NCE Power which is 5% of total DISCOM consumption and there is no restriction on the same. Further Ministry of New & Renewal Energy, Government of India has proposed higher RPPO targets (11.50% and 14.25% for the FY 2016-17 and FY 2017-18 respectively) and addressed all states to adopt the enhanced RPPO targets.</p> <p>The objectors have the Price discovered in solar bidding in other states, which price is based on Solar Park concept. Whereas, the Solar bids called by TSDISCOMs are based on dispersed generation i.e., Solar Projects are being setup at each district level to partially meet the district demand. This model has intangible benefits like Transmission and Distribution loss reduction due to local generation (Solar) meeting the local demand and no necessity to transfer power from far away distance substations. Therefore the price discovered under Solar Park concept is not comparable with dispersed generation. Also, the land for the solar park is being provided by the Government and evacuation facility is not the responsibility of the Solar Power Developer.</p>
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<p>d) Fourth, since, as per the orders of the Commission, NCE units are must-run ones, the Discoms have to purchase the entire power generated by such units with whom they had PPAs, even when they do not require such power and when relatively cheaper power is available from other sources.</p> <p>e) Fifth, to purchase costly NCE power, the Discoms have to seek backing down of relatively cheaper power available from thermal power plants and pay fixed charges for such non-generation. It imposes dual burden on the Discoms -paying higher tariff to NCE units and paying fixed charges for backing down other power plants, thereby increasing the average cost of power per unit.</p> <p>f) Sixth, wide fluctuations in generation of wind power, and to some extent in the case of solar power, due to sudden changes in wind velocity or sun light, as the case may be, will create problems in grid management with a sudden drop in generation of such power, leading to falling of grid frequency. To meet such exigencies, if substantial spinning reserve is permitted and created, it will impose unwarranted burdens on consumers of power. Such spinning reserve or reserve margin, if created, will lead to the dichotomy of being useful for a limited period in a year when such exigencies arise and remaining idle during the</p>	<p>Regarding the objectors view that NCE Projects are must run projects and during back down DISCOMS have to pay Fixed Cost to cheaper Plants but to take NCE Projects has higher cost. The contention of the objector is not correct. The Solar Power (Predominant Power in NCEs) is available only during day time and generally backing down will be done during night time, when the demand will be less therefore such a situation does not arise further backing down will be done for few hours during off peak hours i.e, night time only. There will not be significant impact of such backing downs when compared to the tangible and intangible benefits of NCE Projects.</p> <p>Further to meet the agricultural demand during the day time the Discoms are procuring power from the solar plants. The rates of the solar plants are almost equivalent to the cost of power from the thermal stations and the power is being procured from the thermal stations round the clock. If power is procured through RTC basis the units will be backed down during off-peak hours and the Discoms have to pay the penalties for such backed down energy. The costs will be more than the costs from the Solar Plants.</p> <p>The short term power procurement rate is around Rs. 5.60 which is more than the power procurement rate from the solar power plants.</p> <p>Renewable Energy Integration is a major challenge being experienced by all States and Ministry (MNRE) is contemplating a exclusive Green Transmission Corridor to transfer surplus RE Power particularly Wind Based Power to the needy states, so as to reduce fluctuations of variable and intermittent generation from such projects.</p>
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remaining larger period of the year, with need for backing down and paying fixed charges for such non-generation. Generation of wind power being limited to seasonal availability of adequate wind velocity, especially during the monsoon, if copious rainfall and inflows into reservoirs and their overflowing leading to letting out the same into the sea lead to higher or optimum generation of hydel power, on the one hand, and decrease in demand, on the other, it will lead to availability of additional surplus power during that period. In other words, fluctuations in generation of wind power, whether on lower or higher side, are inherently problematic not only for grid management, but also for the Discoms and their consumers of power.

- g) Seventh, in view of higher tariffs being paid to NCE, when substantial surplus power is available to Discoms, as has been the case now, surplus NCE power cannot be sold to others in a competitive market.
- h) Backing down entails payment of not only fixed charges for such non-generation but also payment of charges for transmission and distribution capacities contracted but not utilised as a result of the same.
- i) An ultra simplistic view of environmental protection, pollution-free generation, national policy, State policy, etc., cannot justify, much less conceal, these disastrous consequences that arise as a result of indiscriminate entering into PPAs by the Discoms with generators for purchasing unwarranted power, including renewable energy, though at the behest of the Government, and giving consents to the same.

The objectors is required to appreciate the tangible and intangible benefits of NCE/RE Projects, which have resulted in availability of surplus power despite shortage of Domestic Coal Supplies, Shortage of Natural Gas Supplies on account of which many Gas Based Projects have been stranded as on date.

vii.	<p>Even now, in view of availability of substantial surplus power, it is better to adopt a cautious and gradual approach for directing the Discoms to enter into long-term PPAs for purchasing NCE. SPDCL has submitted that the balance capacity of solar plants of 2012, 2013 and 2014 bidding and the 2000 MW bidding in 2015 are expected to be commissioned during the year 2017-18. It has projected additional wind based capacity to the extent of 100 MW during 2017-18. I request the Hon'ble Commission to consider the following suggestions, among others, in this connection:</p> <ul style="list-style-type: none"> a) Dispense with the process of determining generic tariffs for NCE units of different kinds and allowing the Discoms to select developers of RE units on that basis for entering into PPAs. Direct the Discoms to select RE units through real competitive and transparent bidding process only or expression of interest with scope for further negotiations for reduction of tariffs quoted, without leaving scope for manipulations like changing terms and conditions of bidding to suit some bidders. b) Put an end to the unhealthy and manipulative practice of revising tariffs for RE on the basis of orders issued by the Government. If the Government wants any such revision, it should be made clear that it has to bear the additional financial requirement directly and that the same shall not be allowed to be collected from the consumers as a part and parcel of tariffs. c) The Discoms should not be allowed to enter into PPAs, especially with developers of RE units, without getting necessary approval from the Commission for long-term load forecast, resources and power procurement plans 	<p>Solar Projects are invited through transparent competitive bid route only. Wind capacity of 100 MW already commissioned.</p>
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<p>and prior consent of the Commission.</p> <p>d) The Commission should reject consent to PPAs the Discoms already had with RE units, without getting its prior consent or consent after submitting the same to the Commission.</p> <p>e) The Commission should reject or revoke consent, if already given, to the PPAs of RE projects whose implementation is delayed and extension of time is given by the Discoms or the Government without seeking consent of the Commission.</p> <p>f) Confine the percentage under RPPO to be decided by the Commission to a reasonable level, keeping in view the prevailing power situation in the State.</p> <p>g) As and when fresh PPAs are entered into with RE units by the Discoms, with prior consent of the Commission, they should be directed to confine the period of PPA for five years only.</p> <p>h) It should be made clear to the Discoms that they should seek prior consent of the Commission, if they want to procure RE exceeding the minimum percentage fixed by it under RPPO. As and when the Discoms seek prior consent of the Commission to enter into PPAs with RE units, exceeding the minimum percentage under RPPO decided by the Commission, the latter should take a holistic view and adopt a cautious and gradual approach to ensure that the same is in larger interest of consumers, before taking its decision, preferably, after holding a public hearing on such proposals of the Discoms.</p>	<p>If the fresh, PPA with RE units are limited to 5 years period, developers will not come forward to set up RE Projects as no financial institution will be willing to lend Loans to developers for such short duration.</p>
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	<p>i) Treat hydel power also as RE for the purpose of RPPO.</p> <p>j) Dispense with the arrangement of so-called renewable energy certificates.</p> <p>k) If necessary, the Commission may consider issuing required regulations or amending relevant regulations to give effect to the above suggestions, among others. The Commission has all the powers to do so. I sincerely hope that the Hon'ble Commission would exercise its discretion and legitimate authority to ensure orderly development of power sector in terms of procurement of power required by the Discoms prudently to ensure competitive tariffs to their consumers, even while encouraging generation and consumption of renewable energy.</p>	
viii.	<p>In view of availability of substantial surplus power, the prevailing power situation in the State confirms that purchasing 5844.3 mu during 2017-18 from Thermal Power Tech Corporation of India Limited is unwarranted (similar was the case during 2016-17). In this connection, I once again request the Hon'ble Commission to consider my submissions dated February 25, 2016 to it on the order given by it permitting the Discoms to purchase this power from TPCIL, on which there is no response from the Commission, except simply stating that "the Commission has passed a detailed order on procurement of power from TPCIL Unit II under the DBFOO and all issues were considered in the order" (page 31 of tariff order for 2016-17). I once again request the Hon'ble Commission to take up its order on TPCIL unit II for a review suomotu and hold a public hearing on it and the PPA signed between the TS Discoms and TPCIL, undo the injustice already done to larger consumer interest and uphold the principles of transparency,</p>	<p>It is to inform that the hon'ble commission has taken due diligence while approving the power purchase from TPCIL. The approved order has been considered for purchase of power in FY 2017-18.</p>

	accountability and public participation with a democratic spirit.	
ix.	<p>The Discoms have submitted that they have taken an escalation of 2% over average variable cost of power plants of TS Genco and AP Genco for the first half-year of 2016-17 or as projected by them, whichever is lower, for the year 2017-18. The Discoms have submitted that TS Genco has initiated measures for reducing the cost of power generation. Some of the measures adopted are - re-negotiation of interest rate on loans for newly commissioned generating stations, minimizing grade slippage of coal which reduces the variable cost of generation, they have explained. If such measures are taken, variable cost, as well as tariffs, should come down. In such a situation, there is no justification for arbitrary escalation as proposed by the Discoms. Responding to our objections to a similar projection made by the Discoms for the year 2016-17, the Hon'ble Commission explained that "the Commission has not accepted the Licensees submission of 2% escalation in variable cost,"but determined the variable cost of each station by considering different relevant factors (page 15 of tariff order for 2016-17). I request the Hon'ble Commission to take a similar stand this time also. The Hon'ble Commission has already conducted a public hearing on generation tariff for the plants of TS Genco for the third control period ending 2018-19. Based on a comprehensive review of submissions of all concerned, the Commission has to determine tariffs to be paid to the plants of TS Genco based on its order to be issued in O.P.No.26 of 2016.</p>	<ul style="list-style-type: none"> • Licensee humbly submits that during the filing of ARR, due consideration has been taken to reduce the variable cost of the TS and AP Genco stations. Variable cost of all the stations has not been escalated by 2%. • In cases, the variable cost as provided by the AP Genco Stations is lower than the actual cost in FY 2016-17 H1, the same has been considered for FY 2017-18. For VTPS-I,II,&III and RTPP Stage-II, the variable cost as given by the generators is way higher than the actual cost in FY 2016-17 H1; for these stations, 2% escalation has been considered over the actual cost in FY 2016-17 H1. • For all the TS Genco stations excluding RTS-B, the variable cost has been capped at INR 2.50 per unit considering the measures aimed at reducing the cost such as joint sampling of coal to avoid grade slippage etc. • Licensee also submits that change in interest costs leads to change in fixed cost. However the variable cost is not impacted by the interest cost.
x.	<p>The Discoms have explained that they have adopted the transmission capacity contracted and rate of transmission charges for 2017-18 as per the approved figures in the MYT transmission tariff order for the period from 2014-15 to 2018-19. Accordingly, SPDCL has shown transmission charges of Rs.1131.43 crore and NPDCL has shown Rs.472.27 crore,</p>	<p>At the time of filing of ARR proposals for FY 2017-18, the MYT Transmission Tariff Order 2014-15 to 2018-19 dt.09.05.2014 issued by erstwhile Honble APERC is effective and the Discom has calculated the Transmission costs based on the contracted capacity and the rates as determined in the said order. As the Honble Commission has determined the Transmission charges for</p>

	<p>totalling to Rs.1603.70 crore. For both the Discoms, in its order dated 1st May, 2017 for transmission charges for TS Transco, the Hon'ble Commission has determined a contracted capacity of 14376.59 MW (9756.44 MW for SPDCL and 4619.15 MW for NPDCL) and transmission charges of Rs.56.3099 per kv per month. Going by that, for a contracted capacity of 14376.59 MW, transmission charges @ Rs.56.3099 per kv per month work out to Rs.971.44 crore for the year 2017-18. In other words, the difference of Rs.632.26 crore (Rs.1603.70-971.26 crore=632.26 crore) should be reduced from the transmission charges projected by the Discoms for the year 2017-18. The Commission may determine the difference for eleven months from May, 2017 for the current financial year, after considering transmission charges for the month of April, 2017 appropriately, since its order is effective from the 1st May. I request the Commission to reduce the same from the revenue requirement of both the Discoms for the current financial year.</p>	<p>the balance years of 3rd control period i.e. for FY 2017-18 and FY 2018-19 vide its Transmission Tariff Order dt.01.05.2017, the licensee humbly requests the Honble Commission to consider the contracted capacity and the Transmission tariff based on the latest order to arrive at transmission costs for FY 2017-18.</p>
xi.	<p>In its order for transmission charges of TS Transco for the years 2017-18 and 2018-19, the Hon'ble Commission has approved a special appropriation of Rs.317.13 crore for 2017-18 as per the order given by APERC for the 2nd control period. Similarly, in the same order, the Hon'ble Commission has also approved a special appropriation of Rs.317.30 crore for 2017-18 (another Rs.317.30 crore for 2018-19) as surplus ARR based on mid-term review for 2014-15 and 2015-16. I request the Hon'ble Commission to reduce the amount of special appropriation of Rs.634.43 crore (Rs.317.13 + 317.30 crore) proportionately from the revenue requirement of both the Discoms for the year 2017-18.</p>	<p>The special appropriation towards true-down pertaining to 2nd control period and Mid-term review of the 2014-15 and 2015-16 of the 3rd control period to the extent of Rs. 634.43 crores for FY 2017-18 has already been reduced from the Transmission business ARR which is reflected in the form of reduction of Transmission tariffs determined by the Honble Commission. Therefore transmission costs calculated based on the revised tariffs will suffice and no further reduction in the ARR of the Discoms is required as it leads to double accounting.</p>
xii.	<p>SPDCL and NPDCL have projected PGCIL and ULDC costs of Rs.925.81 crore and Rs.375.81 crore, distribution costs of Rs.2662.91 crore and Rs.1632.93 crore, and SLDC charges of</p>	<p>The PGCIL and ULDC costs are been claimed on the interstate transactions as agreed upon with the PGCIL based on the CERC determined tariffs.</p>

	Rs.31.24 crore and Rs.13.04 crore respectively for the year 2017-18. In view of the contracted capacity determined by the Commission for the year 2017-18, these charges need to be re-worked out appropriately and re-determined.	The licensee has arrived at SLDC costs based on the SLDC order dt. 09.05.2014 issued by erstwhile APERC. The Honble Commission is yet to determine the revised tariffs for SLDC business for the balance years of the 3 rd Control period.
xiii.	On our submissions relating to backing down, the Hon'ble Commission expressed the view that "the Commission, currently has not allowed any amount against back-down of stations. Any actual quantum realized on back-down will be considered in the true up exercise" (page 13 of tariff order for 2016-17). I hope the Commission would take a similar stand for the year 2017-18 also.	-
xiv.	a) UDAY scheme was announced by the Ministry of Power, Government of India, on 23 rd November, 2015. In their ARR filings for the year 2016-17, the Discoms had informed that "Government of Telangana (GoTS) has conveyed its intention of joining the UDAY scheme." Despite that, after a long delay, the tripartite MoU relating to joining the UDAY scheme was signed by Ministry of Power, GoI, Government of Telangana and TSSPDCL and TSNPDCL on the 4 th January, 2017. Having signed the MoU, with commitments agreed to therein, the Government of Telangana should have taken over the 75% of the loans of the two Discoms outstanding as on the 30 th September, 2015 by 31.3.2017. That it has not done so once again confirms irresponsibility and lack of promptness on the part of GoTS in implementing its commitments in time.	The status of takeover of loans by Government of Telangana under UDAY scheme is Total loan to be taken over- INR 8,923 Crores Total loan already taken over- INR 7,500 Crores Total loan under process to be taken over- 1,423 Crores Nearly 85% of loan commitment has already been met by the Government of Telangana. The Balance 15% will be taken over in this financial year.
	b) In the ARR submissions of the Discoms for the year 2017-18, there is no indication as to when GoTS would take over 75% of their outstanding debts accordingly. Their submissions further imply that they cannot file true-up claims for the previous years unless and until GoTS takes over 75% of their outstanding debts in terms of UDAY scheme.	

	<p>c) The submissions of the Discoms further indicate that they cannot take the commitment of GoTS to take over 75% of their outstanding debts as per UDAY scheme for granted. If they are sure about GoTS taking over such outstanding debts, they can submit true-up claims for the 1st and 2nd control periods and for the last two financial years, showing deduction of 75% of their outstanding debts as per UDAY scheme.</p>	<p>The licensee are not seeking the true-ups for 1st and 2nd control periods and for FY 2014-15 as the Government of Telangana under UDAY is taking over 75% of the outstanding debts as on 30.09.2015.</p>
	<p>d) The Discoms have prayed the Hon'ble Commission to "allow them to file the true-up for previous years separately," without even indicating as to when they would be able to file the same.</p>	<p>The licensees prayed the Honble Commission to permit the licensees to file for final true-up for FY 2015-16 and FY 2016-17 during the filing for FY 2018-19 after assessing the impact of loans taken over by the Government and additional support from the Government.</p>
	<p>e) If GoTS does not take over 75% of outstanding debts of the Discoms under UDAY scheme and if the Discoms would not submit the true-up claims for the previous years till the next general elections, with a view to hoodwinking the people that no additional burdens would be imposed on the consumers of power, thereby serving the political expediency of the party-in-power, it would be no wonder. Since the Discoms have submitted their ARR and tariff proposals, requesting the Commission to continue the tariffs of 2016-17 for the year 2017-18 also, without even submitting required projections, and in view of inadequate budgetary allocation made for power subsidy by GoTS in the budget for 2017-18, the possibility of it not taking over 75% of outstanding debts of the Discoms as per UDAY scheme and the Discoms not submitting true up claims till the next general elections cannot be ruled out.</p>	<p>The status of takeover of loans by Government of Telangana under UDAY scheme is Total loan to be taken over- INR 8,923 Crores Total loan already taken over- INR 7,500 Crores Total loan under process to be taken over- 1,423 Crores Nearly 85% of loan commitment has already been met by the Government of Telanagana. The Balance 15% will be taken over in this financial year</p>
	<p>f) Not submitting true up claims in time by the Discoms would not serve their interests and of their consumers of power. On the one hand, delay in submission of true up claims for</p>	<p>As the Government of Telangana is taking over loans upto 75% under</p>

	<p>years together would aggravate the financial difficulties of the Discoms by increasing need for taking fresh loans and paying interest thereon. On the other hand, accumulation of true up claims for years together, to the extent they are permissible, would lead to giving tariff shocks to the consumers in future.</p>	<p>UDAY MoU, the licensees are not seeking true-ups for the past years i.e. upto 2014-15 in the interest of the consumers.</p>
	<p>g) If there is need for true-down, delay in submission of such claims by the Discoms would deprive the consumers of timely realisation of what is due to them.</p>	<p>The licensees prayed the Honble Commission to permit the licensees to file for final true-up for FY 2015-16 and FY 2016-17 during the filing for FY 2018-19 after assessing the impact of loans taken over by the Government and additional support from the Government.</p>
	<p>h) Delay in submission of true up claims by the Discoms for years together would deprive the Hon'ble Commission of timely opportunity "for examination and (giving) necessary directives to improve performance (of the utilities) in future years."</p>	
	<p>i) In the tariff order for 2016-17, under directive No.10, the Hon'ble Commission directed the Discoms to file the true up of distribution business for the first two control periods and of retail supply business for 2014-15 and 2015-16. The Discoms replied that they will file true up for 2015-16 and 2016-17 along with tariff proposal after considering final MoU signed by GoTS and GoI. I request the Hon'ble Commission to exercise its legitimate authority and direct the Discoms to submit true up claims for past years without further delay and as per applicable regulations, if necessary, by proposing to deduct 75% of their loans outstanding as on 30th September, 2015, and for subsequent periods in their true up claims, making it clear that any further delay in submitting the same would not be permitted and that such delayed claims for true up will not be entertained, but will be summarily rejected. There need not be any difficulty for the Discoms in submitting their true up claims accordingly in the light of signing of the MoU by GoTS relating to UDAY scheme, when they were in a position not to make true up claims for the 1st and 2nd control periods simply on the ground that the GoTS conveyed its "intention" to join</p>	

	UDAY scheme in the past. For the year 2015-16, SPDCL has shown a revenue gap of Rs.2658.55 crore, while NPDCL has shown a revenue gap of Rs.957.61 crore.	
xv.	<p>SPDCL has submitted that it has considered a cost of Rs.332 crore in FY 2016-17 towards interest on pension bonds and that additional interest on pensions bonds projected for FY 2017-18 as per the claims made by TS Genco and AP Genco is Rs.660 crore. Regarding impact due to pension liabilities, we would like to remind that, while approving the first transfer scheme after unbundling of the erstwhile APSEB, the then APERC in the undivided A.P. had permitted revaluation of the assets of AP Genco to provide for pension reserve funds which the erstwhile APSEB had not provided and maintained. APERC had been liberal in allowing additional interest on a year to year basis in the tariff orders dated 24.3.2003 and 4.7.2013. Pension funds are supposed to be provided by the contributions of employees and managements and interest thereon earned periodically. As such, it is not fair to continue to impose such interest burdens on the consumers by allowing the Discoms, TS Genco and AP Genco as pass through periodically. The erstwhile APSEB failed in discharging its responsibility. The Government of TS has to take over 75% liabilities of the Discoms under UdayDiscom Assurance Yojana introduced by the Government of India. In view of the above explained submissions, I request the Hon'ble Commission to give a piece of advice to the Government of TS to take over the pension liabilities of the Discoms and TS Genco and settle the issue permanently. In this connection, I would like to bring to the notice of the Hon'ble Commission that in response to our similar submission on ARR and tariff proposals of AP Discoms for the year 2017-18, Hon'ble APERC, in its tariff order for 2017-18, has expressed the view that "the requests of the objectors may be examined" and intimated the same to the Principal Secretary, department of Energy, GoAP, through its</p>	<p>The liability Rs 4,386.90 towards meeting the pension liability of the following was vested in the erstwhile APGENCO in terms of the statutory First Transfer Scheme dated 30/01/2000 notified by the State Government under the AP Electricity Reforms Act, 1998. Under this provision a Master Trust has been created and vested with the liabilities.</p> <ol style="list-style-type: none"> i. The pensioners / family pensioners of the erstwhile APSEB as on 31/01/1999 and ii. The employees of the erstwhile APSEB as on 31/01/1999 working thereafter for the APGENCO, APTRANSCO and the DISCOMs and since retired. <p>The additional fund required to meet the pension liabilities over and above the interest allowed on pension bonds (bonds were issued to meet the pension liabilities) has been recognized and allowed as pass through in the tariff on a year to year basis by the erstwhile APERC in the tariff orders dated 24/03/2003 and subsequent orders.</p>

	letter dated 11.5.2017.	
xvi.	<p>In their ARR submissions, the Discoms have maintained that regarding SCCL project of 1200 MW (2x600 MW), the consumers in the State should not be saddled with the IDC component which is due to the project execution delays. They have considered a fixed cost of Rs.2.15 and variable cost of Rs.1.80 per unit for the year 2017-18 for purchasing power from this project. However, during the public hearing on the capital cost and multi-year tariff proposals of the project of SCCL, the latter indicated a fixed cost of Rs.2.43 and variable cost of Rs.1.91 per unit for the year 2017-18. However, the submissions made by the Discoms during the public hearing held on 26th April, 2017 on this project have been found wanting in detailed analysis of the issues involved. Except requesting the Commission to take up prudence check of the capital cost of the Singareni Thermal Power Project after issuing appropriate orders on Regulation 1 of 2008, the Discoms could not make any submissions to substantiate the variable and fixed costs they have proposed in their ARR submissions. The Discoms have been found wanting in protecting larger interest of their consumers in the manner in which and with the kind of PPAs they had with Chattisgarh Discom, NTPC, unit II of TPCIL and several NCE units and the same debilitating trend is continuing in the case of the project of SCCL also. These questionable trends indicate that the Discoms do not have adequate freedom to take appropriate decisions to protect larger consumer interest while entering into PPAs with generators in the public and private sectors and that decisions are being thrust on them by the higher-ups in the Establishment. It is for the Hon'ble Commission to come to the rescue of the Discoms and their consumers of power while exercising its regulatory authority on all such issues that have a bearing on the tariffs ultimately the consumers have to pay. It is gratifying to note that</p>	<p>There is scope of interest cost reduction through negotiations with the funding agencies. Keeping this in view, the TSDISCOMs has considered a fixed cost per unit of Rs 2.15/KWh for FY 2017-18. The TSDISCOMs has considered a variable cost per unit of Rs.1.80/KWh for FY 2017-18 and these parameters are subjected to the prudence check of the Hon'ble Commission before actually deciding the final tariff.</p> <p>During the Public Hearing dated 26.04.2017 the TSDISCOMs have sought for a week of time for the submission of objections on the issue and submitted the objections to the Hon'ble TSERC vide letter dated 02.05.2017.</p>

	<p>the Hon'ble Commission has moved in that right direction in the interim orders it has issued in the case of the PPAs the Discoms had with ChattisgarhDiscom and NTPC. We hope that the Hon'ble Commission would adopt a similar approach relating to the project of SCCL also.</p>	
xvii.	<p>The Discoms, even while claiming that they have not proposed any additional purchase of power through bilateral/inter-State purchases for the year 2017-18, have maintained that they may opt for procurement of power during specific days/month depending on demand to ensure the stability of the grid and also to ensure uninterrupted power supply to all categories of consumers in the State. In the background of projected availability of huge surplus power, without making any provision for bilateral or inter-State purchases, the submissions of the Discoms indicate that they themselves are not sure of ensuring uninterrupted supply of power to all categories of consumers in the State, even with the projected availability of huge surplus power, and that their procurement plan is unbalanced and cannot ensure uninterrupted supply of power in tune with fluctuating demand curve, daily, weekly and seasonal, to ensure stability of the grid. This indecisive position again underlines the imperative need for determining long-term load forecast, and procurement and resource plans in a realistic and efficient manner, preferably, after holding a public hearing.</p>	<p>The licensee has not proposed any additional purchase of power through bilateral/ inter-state purchases for the FY 2017-18. However licensee may opt for procurement of power during specific days/ month depending on demand to ensure the stability of the grid and also to ensure uninterrupted power supply to all categories of consumers in the State.</p> <p>Further to mention that, the surplus as reflected in the filings may not be really turn to be absolute surplus in terms of load requirements as there will be lot of uncertainties associated with weather, rainfall etc. in real time scenario that affect the demand and also may differ from the forecasted load demand.</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
30.	L&T Metro Rail (hyderabad) Limited, Shivanand Nimbargi,(MD & CEO)	
	<ol style="list-style-type: none"> 1. Determine and fix the tariff for Category HT-V (B) HMR on Average Cost of Service principle @ Rs. 4.98/kWh, in line with the policy direction issued by the Government of Telangana vide its letter No. 1545/Budget/2015-1, Energy (Budget) Dept., dated 16-03-2016 and Clause 6.4 of the Concession Agreement. 2. Confirm and instruct TSSPDCL that Category HT-V (B): HMR is applicable to the entire Railway System which includes traction, stations, depots and other systems associated with metro rail operations. 3. Direct TSSPDCL to charge the Tariff at Rs. 7.00/kVAh for the entire Rail System which includes traction, stations, depots and other systems associated with metro rail operations, with effect from 1st July 2016 as per the Tariff Order dated 23rd June 2016 passed by Hon'ble Electricity Regulatory till the new Tariff Order is issued by the Hon'ble Commission. 4. Direct TSSPDCL to meter Real Estate Development/Transit Oriented Development loads separately and bill these loads at the relevant commercial tariff instead of clubbing with the Metro Station Loads in accordance with the clause 6.4 of the Concession Agreement. 5. Grant separate/personal hearing to LTMRHL to put across its contentions and pass necessary orders as the Hon'ble Commission may deem fit and necessary in the interest justice. 	<p>Honble Commission has determined the tariff for Hyderabad Metro Rail by creating a sub category under HT-V (B) with tariff of Rs 7.00/ kVAh as energy charges and zero demand charges. This tariff is made applicable to Hyderabad Metro Rail Traction load only.</p> <p>The station auxiliary load (including Lighting, Air Conditioners and Escalators etc.) comes under HT-III(Airports, Railway Stations and Bus Staions) category and Station retail Load (Shops, Malls, Threatres and other stores) comes under HT-II Others Category as per the definitions of HT categories provided in the Tariff Order 2016-17.</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
31. M. Thimma Reddy, Convenor, People’s Monitoring Group on Electricity Regulation, #139, Kakatiya Nagar, Hyderabad – 500 008.		
1	<p><u>REGULATORY ISSUES:</u> The TSDISCOMs are reported to have submitted tariff proposals for the financial year 2017-18 on 13th April 2017 though ARR were submitted on 30th November 2016. The DISCOMs in their submission of ARRs mentioned that these were being filed under Sections 61 or 64 of the Electricity Act, 2003. But without tariff submissions these applications are incomplete as the above Sections deal with tariff proposals but not ARRs and ARRs have no meaning without tariff proposals.</p>	<p>TS Discoms have submitted all the crucial information to the Honble Commission for determining the ARR of the Discoms. Further, TS Discoms have submitted additional information on ARR filings for FY 2017-18 as directed by the Hon’ble Commission and the same is available in the website of TS Discoms. TSDiscoms have submitted the Tariff proposals to the Honble Commission on 13th April, 2017. The delay in Tariff filing has happened as the Discoms are in the process of entering into a tripartite agreement with GoTS and GoI for joining the UDAY scheme and study the impact of the UDAY scheme in the True up filings and in view of the Tariff rationalization process initiated by Ministry of Power.</p>
2	<p>While according to Section 64 (3) the TSDISCOMs were expected to file ARR along with tariff proposals for the financial year 2017-18 by 30th November 2016 they have filed the tariff proposals before TSERC only on April 13, 2017. In the interregnum the DISCOMs filed applications before the Commission and sought extension of time for filing tariff proposals from time to time. There is a delay of more than four months in submitting the tariff proposals before TSERC.</p>	<p>The licensee has sought additional time for filing of tariff proposals due to the following reasons:</p> <ul style="list-style-type: none"> a) Ministry of Power (MoP), Government of India (GoI) had constituted a committee for examining and recommending options for simplification an rationalization of consumer categories and tariff. b) Government of Telangana (GoTS) had conveyed its intention of joining UDAY scheme; however the MoU was not signed at the time of ARR filing. Subsequently, the licensee has entered into tripartite agreement with GoTS and GoI on 4th January, 2017.
3	<p>TSERC in its Tariff Order for the FY 2015-16 observed: “the delay in filings caused difficulties not only to objectors and consumers but also to the Commission. The Licensees shall make every effort to file ARR & Tariff Proposals 120 days before the effective date of Tariffs as per Sec.64 of the Electricity Act, 2003” (para 4.2.3). Furthermore, the Commission had directed the DISCOMs, “the Discoms are directed to submit the ARR and Tariff proposals in time i.e.</p>	<p>Though the licensee had put in all efforts for filing the tariff proposals on time, the delay in tariff filing was mainly attributable to the above factors. However the TS Discoms have filed the ARR in time i.e., on 30th November in order to comply with the directive of TSERC.</p>

	by 30 th November of current year in order to make the Tariff Order effective from 1 st April of next year” (Directive 7.9 at page 237 of tariff order for 2015-16). The Commission by allowing the applications of DISCOMs to delay tariff proposal filings appears to have violated its own orders/directions in this regard.	
4	TSDISCOMs have entered in to a tripartite agreement with the central government and the state government under the central government’s UDAY scheme whereby 75% of the long term outstanding debt of the DISCOMs is being taken over by the state government. For the FY 2016-17 as well as FY 2017-18 DISCOMs have shown the UDAY scheme as one of the reasons for delay in filing tariff proposals. But one of the conditions laid down under UDAY scheme is that DISCOMs shall file tariff proposals in time so that new tariffs will come in to force from the first day of the ensuing financial year. In the recent ranking of DISCOMs in the country TSDISCOMs have got lower rankings because of delay in filing tariff proposals.	After Government of Telangana (GoTS) had conveyed its intention of joining UDAY scheme; the licensee has entered into tripartite agreement with GoTS and GoI on 4 th January, 2017. The licensee is putting all efforts for filing of tariff proposals in time whereas the delay in filings is attributable to certain uncontrollable factors which are being explained in the filings. However, TS Discoms have filed the ARR for FY17-18 in time to avoid the delay in filings.
5	TSDISCOMs also attributed delay in filing tariff proposals to the Central government’s exercise on rationalizing tariff proposals. The question is - is there need to delay tariff filings on the above pretext. When the committee appointed by MoP, GoI, itself has not come out with any specific proposals, except making vague and generalised observations on simplification and reduction of categories and is still in the process of eliciting views on the proposed re-categorisation of consumers, and when there is no legally binding order in that direction, attempts to propose new categories of consumers on the basis of such vague proposals seems hasty. When the committee itself has not come out with any specific proposals for re-categorisation of consumers, its implications and justification for the same,	Combined meetings of the Committee on simplification and rationalization of tariff structure were held under the Chairmanship of the Additional Secretary, MoP, wherein certain options were recommended in the process of simplification and rationalization of consumer categories and tariffs. Based on the recommendations, the licensee was in a need to make a study to assess the impact of such an exercise on different consumer categories in the State of Telangana. Though the committee may take more time to come out with the final report on tariff simplification and rationalization, the process needs to be initiated and implemented by the Discoms gradually to meet the objective duly ensuring that the consumers are not affected with the rationalized tariff. The Discoms proposal to make DSM measures mandatory for LT-V consumers and free power to all farmers (excluding corporate farmers) without any restriction on number of connections or

	<p>inviting comments/suggestions/views of all stakeholders on such vague proposals at preliminary stage itself is premature. The committee appointed by MoP, GoI is expected to take two to three years to come out with the final report on simplification and rationalization of tariffs,Therefore, the delay in submission of tariff proposals by the DISCOMs is unwarranted and the reason given for the same seems to be a lame excuse to cover up their failure to submit the same in time. The above reason is only a pretext to delay tariff proposal submissions. It is sad that the Commission has consented to their proposals. The Commission should have rejected the present ARR filings and should have directed them to submit tariff proposals forthwith along with the ARR, without any delay.</p>	<p>acreage is one of the steps initiated for reducing the line items of the tariff structure.</p>
6	<p>According to Clause 8.1 (7) of the National Electricity Policy 2016 “Appropriate Commissions should initiate tariff determination and regulatory scrutiny on a suo moto basis in case the licensee does not initiate filings in time. It is desirable that requisite tariff changes come into effect from the date of commencement of each financial year and any gap on account of delay in filing should be on account of licensee” The Secretary of the Commission through the circular Lr. No. TSERC / Secy / F-No.ARR2017-18/5 / D.No.879 / 17. Date:17.02.2107 intimated the TSDISCOMs as follows, “For the above said reasons, I am directed by the Commission to require you to file tariff proposals on or before 23.02.2017 and in default, the Commission will act suo moto for determination of the tariff for FY 2017-18 in accordance with the directions of the Hon’ble Appellate Tribunal for Electricity in O. P. No. 1 of 2011 based on information available with the Commission in the form of ARR / FPTs for FY 2015-16 and FY 2016-17 and ARR for FY 2017-18. The Commission will reckon the information filed</p>	<p>--</p>

	by licensees after commencement the suo moto proceedings for determination of the retail supply tariff for FY 2017-18”.	
8	Though the TSDISCOMs did not file tariff proposals by 23-02-2017 the Commission did not initiate any action suo moto to commence tariff determination process for the FY 2017-18. Though DISCOMs filed tariff proposals on 13 th April 2017 the same did not contain any additional information on revenue accruals during the FY 2017-18 on the basis of existing tariffs/categories and on the basis of proposed amendments to tariff categories or the revenue gap that need to be filled. No purpose was served in waiting for the filing of tariff proposals by the TSDISCOMs. The Commission should have gone ahead with suo motu process as indicated in the above Circular.	TS Discoms have submitted additional information on ARR filings and Tariff Proposals for FY 2017-18 as directed by the Hon’ble Commission and the same is available in the website of TS Discoms. Further additional information required if any will also be submitted as per the directions of the Hon’ble Commission. However, there is no significant financial impact on revenue of the Discoms due to the proposed changes in the definition of the consumer categories.
9	Following the Clause 8.1 (7) of the National Electricity Policy 2016 quoted in the above Circular the Commission has to see that “any gap on account of delay in filing should be on account of licensee”. The Commission has to see that from the coming financial year the TSDISCOMs file the tariff proposals in full in time.	The Discoms are putting all its efforts for filing of ARR & Tariff proposals in time.
10	<u>ELECTRICITY REQUIREMENT ESTIMATES:</u> Power requirement estimate for 2017-18 is higher than previous years’ experience. Both DISCOMs in Telangana projected high growth rates in electricity consumption during the ensuing financial year 2017-18. SPDCL attributed this growth to additional power required for water grid, Hyderabad Metro Rail, 9 hour power supply to agriculture pumpsets and new lift irrigation schemes. Similarly, NPDCL also attributed this growth to additional power required for water grid, 9 hour power supply to agriculture pumpsets and new lift irrigation schemes. While SPDCL estimated growth rate of 9.42% NPDCL arrived at 12.05% growth rate in electricity consumption under its	The Discom has considered the historical growth trend observed in sales of each category since five years and hence adopted a moderate growth rate for projecting the sales in FY2017-18. In addition, higher growth of sales are projected in certain categories as shown below: a) A higher growth rate of 10.83% is observed in the agriculture sales in H1 of FY16-17 over H1 of FY15-16, on account of releasing 54,717Nos of Agl. Service connections in FY15-16 against the target of 50,000Nos in addition to the extension of 9hrs power supply to agriculture consumers from 01.04.2016 as per the policy of GoTS. Further, the target for release of Agl. Connections for FY16-17 are 64,730Nos as against which 74,946 nos services are released. Considering the same per HP consumption for ensuing

	<p>area. Further, NPDCL also estimated 26.16% growth rate in electricity consumption by HT services compared to 8% growth rate during the previous year. During the preceding year (2016-17) growth in consumption under SPDCL is less than 33% of this. In the case of NPDCL it was less than 60% the expected growth during 2017-18. This historical experience demands a relook at the consumption growth estimated by both the DISCOMs.</p>	<p>year and keeping in view the increase in number of Agl. Connections and continuation of 9hrs power supply, a growth rate of 6.5% is adopted for projecting the sales in FY17-18.</p> <p>b) Higher growth rate is projected in HT Industrial sales expecting that a substantial portion of open access consumers will come back to the grid.</p> <p>c) Higher growth rate is projected for HMR Traction category expecting a load of 12.44MU in FY17-18, as communicated by L&T-HMR.</p> <p>d) Higher growth rate is projected in HT-IV category on account of upcoming LI schemes of 192MVA with a consumption of 276MU in FY17-18, based on the information given by the Irrigation Department.</p>
11	<p>In the case of Railways electricity consumption is declining over the years. Besides this, Railways is being treated as deemed licensee and is free to access power under open access. Railways has already started to procure power from agencies other than DISCOMs. Despite this trend both the DISCOMs in Telangana estimated increase in power consumption by Railways. DISCOMs need to re-examine this.</p>	<p>As per the clause 13 of Regulation No.4 of 2016 (Distribution License Regulation), the Railways has to make an application in the form specified in Schedule-2 to the Hon'ble TSERC to get identified as a deemed licensee. If railways were to opt for a deemed licensee status as per the provisions of the Electricity Act, it would need to surrender the contracted capacity with the Discom by terminating the HT agreement entered with the Discoms, which is not happened so far. Hence, a nominal growth rate of 2% is adopted for Railway Traction category with an additional sales volume of 2.4MU on account of upcoming Traction sub-stations in FY17-18.</p>
12	<p>TSSPDCL in its ARR filing stated, "It is expected that a substantial portion of open access consumers will come back to the grid". But it did not provide any basis for this statement.</p>	<p>During the R&C period which was imposed during the year 2012 and in 2013 upto 30th July 2013, more number of HT consumers have moved to open access due to shortage of power and load reliefs. Whereas, after the formation of Telangana State, no load reliefs are being imposed and the State has moved towards surplus power situation, due to which the Discom is able to extend un-interrupted power supply to all its consumers without any load reliefs. Hence, the Discom is expecting that a substantial portion of open access consumers will come back to the</p>

		grid.
13	Out of 54,756 MU of being procured in the state of Telangana 12,907 MU will be supplied to agriculture wells. In other words LT agriculture will be accounting for 23.57% of the power consumption in the state. In the case of TSSPDCL agriculture wells will be accounting for 19.89% of electricity consumption and in the case of TSNPDCL it will be 32.25%. Despite such significant consumption by this sector the basis on which this consumption is estimated still raises many doubts.	The agricultural consumption is assessed based on the ISI methodology approved by the Hon'ble Commission.
14	Both the DISCOMs estimated 6.50% growth in electricity consumption by agriculture wells during 2017-18. Both the DISCOMs attributed this growth to additional new agriculture services released and to 9 hour power supply. The DISCOMs also submitted "In the current year the rain fall is heavy and all tanks are filled and ground water is raised and also the cultivation land is also expected to increase. Thus sharp rise of agriculture consumption is expected". (NPDCL filing p.16) But reports indicate that ground water levels already declined and per day electricity consumption in the state declined from 160 MU to 130 MU.	<p>A higher growth rate of 10.83% is observed in the agriculture sales in H1 of FY16-17 over H1 of FY15-16, on account of releasing 54,717Nos of Agl. Service connections in FY15-16 against the target of 50,000Nos in addition to the extension of 9hrs power supply to agriculture consumers from 01.04.2016 as per the policy of GoTS. Further, the target for release of Agl. Connections for FY16-17 are 64,730Nos. Considering the same per HP consumption for ensuing year and keeping in view the increase in number of Agl. Connections and continuation of 9hrs power supply, a growth rate of 6.5% was adopted for projecting the sales in FY17-18.</p> <p>Further, it is observed that 74,946Nos of services were released in FY16-17 upto 31st March, 2017 against the target of 64,730Nos and the actual Sales volume has also increased to 8768MU against the projection of 7177MU in FY16-17.</p>
15	Given the unmetered nature of these services the DISCOMs are expected to use the methodology recommended by ISI to estimate electricity consumption in agriculture sector. NPDCL in its submission claimed that it was following ISI methodology. But there was no description of how this was being followed. It maintained that it had fixed 3168 meters for LV side of the Agricultural DTRs as per the ISI	<p>It is to submit that agricultural consumption in TSSPDCL is arrived based on effective implementation of ISI suggested methodology approved by the Honourable ERC.</p> <p>This method is as described below. M/s. Indian Statistical Institute has randomly picked up some Agl DTRs as samples from rural circles. For all these sampled DTRs, 0.5 S class</p>

Methodology. But information is not available on how many of these meters are in working conditions and how many of these meters provided consistent and dependable information. Past experience shows that less than 25% of the sample readings were taken. SPDCL did not mention any thing about ISI methodology in estimating agriculture consumption. There appears to be unwillingness on the part of DISCOMs to estimate agriculture consumption properly. DISCOMs do not want to share the real picture. There is apprehension that T&D losses are being shown as agriculture consumption and that subsidy is going to support inefficient functioning.

LTCT meters were fixed, so that load surveys of the DTRs can be dumped on a monthly basis. The working condition of the above meters is shown below

Sl.No.	Circle	No.of ISI sample DTRs	No.of Valid DTRs (working)	% Working DTRs
1	Nalgonda	840	684	81.43%
2	Medak	261	261	100.00%
3	Mahabubnagar	609	393	64.53%
4	Siddipet	344	308	89.53%
5	RR East	57	57	100.00%
6	RR North	38	38	100.00%
7	RR South	164	164	100.00%
	TOTAL	2313	1905	82.36%

82.36% Valid DTRs (in working condition) are available for the month of Feb'17.

- The consumption per month at each of the sample DTR is measured. The average consumption per DTR is then estimated (i.e.) total consumption of all the sample DTRs / Number of sample DTRs in each circle (capacity wise DTRs).
- Per DTR consumption in each capacity of DTR population is the basis for extrapolation of the agricultural consumption. (i.e.) total number of Agl. DTRs in the circle multiplied by the average consumption per DTR of the circle.

		<ul style="list-style-type: none"> • While taking the readings of sample DTRs, MRI dumps are also taken. Only those sample DTRs showing all the voltages and currents in the three phases (called valid DTRs) are considered for assessment of consumption. • As directed by the Hon'ble Electricity Regulatory Commission, meters were installed for 10% of sample size (i.e. 225 Nos.) in addition, so as to increase the number of valid DTRs to be considered for assessment of consumption
16	In response to the Commission's directive to "submit a detailed writeup on how the above directive has been compiled in the projection of the agricultural consumption for FY 2017-18" TSSPDCL provided information only for Medal circle for the October 2016. Even according to this report one third of the sample DTR meters are not working properly. TSNPDCL in its reply mentioned that 3,168 meters are installed on the sampled DTRs. Beyond this no further useful information is provided.	The assessment of agricultural consumption of all rural circles is being done every month as per the ISI methodology and submitted to the Honourable TSERC. The total no. of sample DTRs in TSSPDCL is 2313 nos.
17	Importance of affordable and quality supply to agriculture services in securing food security and farmer livelihood cannot be denied. At the same time electricity supply to agriculture has impact on finances of DISCOMs as well as state government. The present practices in estimation of agriculture consumption have many gaps. There is need for better apportioning of electricity between T&D losses and Agriculture consumption. This will help to clarify whether agricultural consumption is being subsidised or technical losses and theft are being subsidized. To achieve this sampling, data collection and analysis norms need to be revisited periodically involving independent, third party agencies. Segregated feeders and all DTRs serving agriculture services need to be metered. The tripartite agreement under UDAY stipulates that DISCOMs achieve	As part of 100% metering to Agriculture DTRs in TSSPDCL, a proposal was submitted to Secretary/ERC for fixing of energy meters to all Agriculture DTRs in Nagarkurnool Division, Mahabubnagar. On receipt of approval, works will be executed

	100% DTR metering. We request the Commission to direct the DISCOMs to first meter all DTRs serving agriculture services under this initiative. This measure will help to put together as complete information as possible, without involving the cumbersome process of metering all agriculture services. This will also help to do away with problems faced in implementing sampling method prescribed by ISI. At the same time care should be taken that meter reading/billing efficiency is 100%. Data from these meters also need to be made public.										
18	<p>T&D LOSSES: T&D loss levels in both the DISCOMs continue to be high. According to the ARR filings of the TDISCOMs during the ensuing year 2017-18 T&D losses in the state will be accounting for 14.69% of the power to be supplied. It will be 14.54% in the case of SPDCL and 15.05% in the case of NPDCL. These percentages are higher than the level achieved by the DISCOMs during 2016-17. During 2016-17 T&D losses stood at 10.26% in the case of SPDCL and 10.93% in the case of NPDCL. T&D losses during 2017-18 shall be lower than in 2016-17. Higher T&D losses lead to higher quantum of power procurement and also higher tariff burden on the consumers and higher subsidy support burden on the state government. As substantial amounts are being spent on T&D infrastructure and also O&M including salaries these should reflect in lower T&D losses.</p>	<p>The Energy requirement is arrived duly considering the approved losses and projected sales for FY16-17 and FY17-18, which is detailed in section 3.2.4 of chapter 3 of ARR Filings. The cumulative Distribution losses and total T&D (Transmission & Distribution) losses of TSSPDCL for FY16-17 and FY17-18 are tabulated below for reference:</p> <table border="1"> <thead> <tr> <th>Description</th> <th>FY16-17</th> <th>FY17-18</th> </tr> </thead> <tbody> <tr> <td>Cumulative Distribution Losses (%) (including EHT sales)</td> <td>10.26</td> <td>9.84</td> </tr> <tr> <td>Total T&D Losses (%)</td> <td>15.30</td> <td>14.54</td> </tr> </tbody> </table> <p>Hence, the T&D losses in FY17-18 are lower compared to that in FY16-17.</p>	Description	FY16-17	FY17-18	Cumulative Distribution Losses (%) (including EHT sales)	10.26	9.84	Total T&D Losses (%)	15.30	14.54
Description	FY16-17	FY17-18									
Cumulative Distribution Losses (%) (including EHT sales)	10.26	9.84									
Total T&D Losses (%)	15.30	14.54									
19	Distribution/commercial losses in Hyderabad South Circle continue to be more than 40%. In 2014 High Court gave directions to the Licensee to action to bring down commercial losses/theft in the area covered by the Circle. Following this some inspections were conducted in some areas of the Circle in February and March 2014. These inspections had shown widespread theft. But no inspections	Intensive inspections are being conducted on high loss feeders in the Hyderabad South Circle continuously to curb the theft and to reduce the losses. The number of cases booked in Hyderabad South Circle every year and the assessment amount along with details of persons who committed second offence is shown below:									

	<p>or other actions were taken after 2014 March to bring down power theft in this Circle. We request the Commission to direct TSSPDCL to take concerted action to bring down commercial losses in this Circle. T&D losses in the Circle over and above the average T&D loss levels of DSICOM shall be borne by the TSSPDCL only. This burden shall not be placed on the honest consumers.</p>	<table border="1"> <thead> <tr> <th rowspan="2">Sl.No</th> <th rowspan="2">Period</th> <th colspan="2">Total Cases booked</th> <th rowspan="2">No. of persons arrested (Second offence)</th> </tr> <tr> <th>No.</th> <th>Amount (in Lakhs)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Apr 2013 - Mar 2014</td> <td>9805</td> <td>570</td> <td>7</td> </tr> <tr> <td>2</td> <td>Apr 2014 - Mar 2015</td> <td>11157</td> <td>901</td> <td>8</td> </tr> <tr> <td>3</td> <td>Apr 2015 - Mar 2016</td> <td>8669</td> <td>475</td> <td>14</td> </tr> <tr> <td>4</td> <td>Apr 2016 - Mar 2017</td> <td>11169</td> <td>680</td> <td>23</td> </tr> </tbody> </table> <p>The intensive inspections are being conducted continuously after the Hon'ble High court orders and continuous efforts are being made by the officers and staff of TSSPDCL to reduce the distribution losses in Hyderabad South circle.</p>	Sl.No	Period	Total Cases booked		No. of persons arrested (Second offence)	No.	Amount (in Lakhs)	1	Apr 2013 - Mar 2014	9805	570	7	2	Apr 2014 - Mar 2015	11157	901	8	3	Apr 2015 - Mar 2016	8669	475	14	4	Apr 2016 - Mar 2017	11169	680	23
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20	<p><u>ENERGY EFFICIENCY:</u> The Telangana State government has entered in to an agreement with the central government to implement Power for All programme. This includes energy conservation and energy efficiency interventions.Both the DISCOMs in Telangana have launched several energy efficiency initiatives. This programme targets to replace 19.4 lakh pumpsets with star rated energy efficient pumpsets. About 20,000 pumpsets are expected to be replaced in 2016 and will be completed by 2021. Under DELP segment all households in the state will be provided two LED bulbs. Implementation will start this year with coverage of 20 lakh households. All households will be covered by 2019. Energy savings from these schemes shall be taken in to account while arriving at the total quantum of power needed in the state.</p>	<p>TSSPDCL has decided to implement the pilot project of Agricultural DSM to replace 3299 nos low efficiency agriculture pumpsets with 5 star rated (high efficiency) pumpsets in Medak circle. M/s. Energy Efficiency Service Ltd. (EESL), a joint venture company of PSUs of Ministry of Power under Government of India has carried out survey for agriculture pumpsets on sample basis and submitted a DPR. Agreement to be concluded with M/s. EESL shortly for implementation of Agricultural DSM programme to 3299 Nos. agriculture pumpsets in Medak District for an amount of Rs. 12.30 crores and the project shall be completed 6 to 8 months. Further, a Purchase Order was placed on M/s. EESL for supply of 2,78,000 Nos. 9 W LED bulbs for TSSPDCL. Each household is being provided with 2 Nos. of 9 Watt LED bulbs. The LED bulbs are being distributed in 15 Nagara panchayats under DELP Scheme. The Distribution of LED bulbs as on 18.05.2017 is shown below.</p>																											
21	These energy efficiency initiatives will impact expenditure																												

	and revenues of the DISCOMs. All information related to these programmes shall be shared with the public. These shall be cleared by the Commission after holding public hearings as being done in the neighbouring state of Andhra Pradesh.	<table border="1"> <thead> <tr> <th>Proposed</th> <th>Distributed</th> <th>Balance to be distributed</th> </tr> </thead> <tbody> <tr> <td>278006</td> <td>263738</td> <td>14268</td> </tr> </tbody> </table> <p>The energy savings by implementing the above schemes will be considered in estimating the energy requirement of the Discoms during the next year as the schemes are at nascent stage.</p>	Proposed	Distributed	Balance to be distributed	278006	263738	14268
Proposed	Distributed	Balance to be distributed						
278006	263738	14268						
22	<p><u>SOLAR INITIATIVES:</u> The Telangana New and Renewable Energy Development Corporation with the involvement of TSDISCOMs and with the support of the State Government of Telangana renewed attempts to promote rooftop solar programme and solar pump sets. These initiatives bring down electricity consumption from the grid. These initiatives shall also be taken in to account while estimating power procurement requirement in Telangana during the financial year 2017-18.</p>	As of 18-5-2017, nearly 17 MW capacity of Roof Top Solar Plants has been released in TSSPDCL area. This will have very meager impact on the Power Procurement requirement of Telangana during the financial year 2017-18.						
23	<p><u>POWER PURCHASE AVAILABILITY AND COST:</u> Rs. 24,421.47 Cr out of total ARR of Rs. 31,930 Cr goes for power purchase, accounting for 76.48% of ARR for FY 2017-18. But this appears to be an underestimate. In the ARR filings there are two sets of figures for energy availability in Telangana during 2017-18. 63,279 MU (p.45, SPDCL ARR) and 66,076 MU (p.xi, SPDCL ARR, Forms 1.4, 4, 4.1). The difference between the two figures is 2,797 MU. This is the quantity available through market (NPDCL – 823.66 MU and SPDCL – 1,973.27 MU). No explanation is given for estimating the availability of this quantum of power. Both the DISCOMs show availability of power from market during the months of April and May 2017. Cost of this power is placed at Rs. 6.20/Unit.</p>	The availability of 2797MU under Market purchases is shown in the filings, as the period of certain Short Term Power Purchase Agreements already entered by the Discom in FY16-17 will be completed by May'2017. Due to surplus power available from all other sources, no dispatch is shown from market source.						

	During these two months also there is surplus power – availability more than dispatch (without taking market sources in to account)	
24	<p>It is clear that surplus from all sources is higher than that available from market sources. This implies that there is no need for procurement from market at all. Even without market purchases there will be surplus during the two months when demand will be high.</p> <p>The question is – is there need to mention it in the ARR? At some places in ARR it is mentioned that the DISCOMs may go in for purchases from the market if need arises: “Bilateral/Inter-State purchases: The licensee has not proposed any additional purchase of power through bilateral/ inter-state purchases for the FY 2017-18. However licensee may opt for procurement of power during specific days/ month depending on demand to ensure the stability of the grid and also to ensure uninterrupted power supply to all categories of consumers in the State.” (TSSPDCL, p. 39)</p>	<p>In order to meet the increasing demand during some specific days/months and to provide uninterrupted power supply to all categories of consumers, the Discom has mentioned in the filings that it may opt for short term power procurement if required in FY17-18. However, the Discom has not proposed any market purchases due to surplus power available in FY17-18.</p> <p>Further, the surplus as reflected in the filings may not be really turn to be absolute surplus in terms of load requirements as there will be lot of uncertainties associated with weather, rainfall etc. in real time scenario that affect the demand and also may differ from the forecasted load demand.</p>
25	<p>Request for Proposal (RfP) Notice is placed on TSSPDCL website calling for bids for supply of power mentions 600 MW (RTC) during first half of April 2017. Previously there were news that TSDISCOMs are going to procure 500 MW power. Newspaper reports also mentioned that the balance demand will be sourced from short term purchases. (The Hindu 25-12-2016)</p> <p>While computing power purchase costs as part of ARR 54,756 MU is taken in to account (p.54, SPDCL ARR). In this power procurement from market/short term purchases is not included even though power is procured from these sources. To this extent there is an underestimate of power purchase cost.</p>	<p>The objector’s contention is that the additional procurement of 600 MW was proposed for the first half of April 2017 and floated tender due to increased demand in the Rabi Season & Ongoing Summer, which quantum was not projected in the ARR filed by DISCOMs for FY 2017-18 (Stated underestimate of Power Purchase Cost).</p> <p>The submission of TSDISCOMs is that the ARR filing was done during December 2016 based on demand projection at that time. However, after reviewing the actual Power Supply Position, TSPCC decided to procure 350 MW / 600 MW for two months only i.e., March 2017 (31 Days) & April 2017 (only from 15 days) to meet the Peak demand due to Ongoing Summer and also for the Rabi Crop. As March 2017 already covered under FY 2016-17, the balance 15 days covered in FY 2017 -18. Though bids called for orders have been placed during March 2017 to be effective</p>

		from 16 th March 2017 instead of 1 st March 2017 by monitoring the Grid Demand on Real Time Basis, and after taking cautious approach purchase Order was placed for 100 MW only for April 2017 (15 Days). There will always be variance between Projections & Actuals.
26	Variable cost of RTS – B is mentioned as Rs. 3.39 per unit. This is 35% higher than other coal based thermal plants in Telangana. This needs to be examined.	The Unit configuration of RTS-B is 62.5 MW, which has been serving the State for the last 46 years. Also the Station Heat Rate (SHR) of RTS-B is 2800 Kcal/Kwh (Heat required for 1 Unit generation) Therefore higher consumption of coal occurs as compared to higher Unit configuration of 500 MW (@ 2450 Kcal/Kwh), in view of advanced optimal design. Therefore variable cost of RTS-B will be higher.
27	In their ARR filings TSDISCOMs stated that they had not projected any availability from new gas based IPPs in the absence of any proposal of supply of power to stranded gas based plants. But there are reports about gas availability from KG basin and that GENCOs are reported to have written to DISCOMs about power availability from gas based stations but no reply from DISCOMs. TSDISCOMs in their filings mentioned that they would not be procuring power from GVK, Spectrum and Lanco as PPAs with them had expired. But there is no meaning in not procuring power from Reliance plant as PPA with this plant will expire only in December 2017. Gas based power plants may be used as peak load stations. With the help of this short term market purchases can be reduced or eliminated.	Based on the past experience on availability of gas supplies to new IPPs and no generation, the Discom has not projected any availability from new gas based IPPs.
28	In the case of SCCL power plant see that permanent coal allocation is made from SCCL's mines. This will help to bring down its energy/variable cost.	Regarding the coal allocations it is to submit that the TSDISCOMs in its written objections dated 02.05.2017 has requested the Hon'ble Commission to direct M/s. SCCL to supply coal to STPP, since the Ministry of Power, Govt. of India has already notified (on 10th June 2016) the mechanism of flexibility in utilization of domestic coal aggregated within the State for usage amongst the power generating

		stations in the State, which would reduce the coal transportation cost and eventually reduce the cost of electricity to consumers.
29	The filings show that more than 1500 MW capacity solar plants are going to be set up in Telangana during 2017-18. Biddings for solar plants are going on from the year 2012. It has to be seen that bidders who did not set up solar power plants according to the schedule shall not be allowed to connect to the grid. The PPAs with bidders who are not able to set up the plants in time shall be cancelled.	The Government has extended the timelines for Solar plants selected in 2015 bidding upto 30 th June 2017 keeping in view of the difficulties expressed by the Solar Power developers in procurement of land, demonitisation effect and District Reorganisation. The synchronization permission are not being issued for the solar plants which are not set up within the revised scheduled time. The PPAs will become infructuous/terminated if the solar plants have not set up within the revised scheduled time.
30	The filings show that more than 100 MW capacity wind plants are going to be set up in Telangana during 2017-18. It has to be seen that these wind power developers shall be selected through competitive bidding. Already states like Gujarat, Rajasthan, AP, and Karnataka have chosen competitive bidding route to select developers for wind power plants. In the recent national level bidding for wind power units conducted by SECI unit cost has come down to Rs. 3.46 per unit compared to Rs. 4.70 per unit allowed by the Commission under cost plus principle.	Agreed. Discoms shall adhere to the National Tariff Policy, 2016, for procurement of wind power through competitive bidding process only.
31	<u>ELECTRICITY TARIFF ISSUES:</u> In the tariff proposals filed by the TSDSCOMs the Commission was requested to retain the tariffs as per the Tariff order of FY 2016-17. Through these proposals they also proposed changes to some consumer categories. But these filings did not mention the revenues at current tariffs and categories and revenues at the current tariffs and the proposed changes to the consumer categories. Without this information it will not be possible to have an idea whether the current tariffs will be enough to recover ARR. Whether there will be enough to fill the revenue gap. According to TSDISCOMs filings total ARR for FY 2017-18	There is no significant financial impact on revenue of the Discoms due to the proposed changes in the definition of the consumer categories. The Licensee has filed ARR and Tariff proposals for FY2017-18 before the Hon'ble commission and submitted additional information as per the directions of Hon'ble commission. The Honble Commission considering the Discom proposals and the views of the stakeholders during public hearing will determine the tariffs and requirement of government subsidy to bridge the revenue gap if any.

	stands at Rs. 31,930.45 Crore. The State Government of Telangana announced a subsidy of Rs. 4,385 Crore to the TSDISCOMs. It has to be examined whether this subsidy will be enough to cover the revenue gap.	
32	The Regulation related to retail supply tariff determination demand complete information on these aspects. In the DISCOMs filings the Regulatory Forms 5, 7,8,9, and 10 related to the FY 2017-18 are empty. To this extent, even after a delay of more than four months in filing tariff proposals, there is gap in information to determine tariffs.	TS Discoms have submitted all the crucial information to the Honble Commission for determining the ARR of the Discoms. Further, TS Discoms have submitted additional information on ARR filings and Tariff proposals for FY 2017-18 as directed by the Hon'ble Commission and the same is available in the website of TS Discoms.
33	<u>ELECTRICAL ACCIDENTS:</u> Within TSSPDCL during 2015-16 Mahabubnagar district recorded 126 fatal human accidents and Medak district recorded 123 fatal human accidents. This trend continued during 2016-17 also. Special attention shall be paid to these two districts in terms of electrical safety related interventions.	Measures are being taken to avoid electrical accidents such as conducting Distribution Network Renovation Drive in all Rural areas to set right the network system. Consumers are being educated or warned not to meddle with electrical equipment.
34	Only small proportion of fatal accident victims families are being paid ex gratia. The DISCOMs have to expedite payment of ex gratia by simplifying and streamlining procedures.	The process to pay the compensation is made online and exgratia is being paid on uploading of all the required documents such as FIR, postmortem, legal heir etc. to simplify the procedure.
35	The compensation paid to the electrocution victims shall not be recovered by the DISCOMs from ARR. This compensation shall be paid by the DISCOMs from their internal resources. Accident is a result of failure of the DISCOMs to maintain the electrical network in a proper condition. Financial burden arising from failure of DISCOMs cannot be placed on the electricity consumers in the state.	The licensee would like to inform that all the accidents are not due to improper maintenance of the lines / equipment's. The cause for majority of the accidents is mostly beyond the control of the licensee. The compensation being paid shall be treated as part of its business and will be recovered through ARR.
36	Following Section 53 (d) of the Electricity Act, 2003 the State Electricity Regulatory Commission shall be informed	It is being informed in accordance with IE Act 2003

	regularly about all electrical accidents occurring in the state along with the action taken reports.	
37	More than compensation to the electrocution accident victims what is important is prevention of such incidents. Any amount of compensation cannot provide relief to the victims' families. Andhra Pradesh is one of the states with highest number of electrical accidents. All necessary, preventive measures shall be taken to avoid the electrical accidents.	Measures are being taken to avoid electrical accidents such as conducting Distribution Network Renovation Drive in all Rural areas to set right the network system. Consumers are being educated or warned not to meddle with electrical equipment
38	One of the important reasons for the electrical accidents in the state is lack of proper maintenance of electrical network that is resulting in snapping of conductors and distribution transformer blow outs. Age old electrical poles and conductors are not being replaced as required. This is resulting in sagging and snapping of conductors which have become death traps.	Measures are being taken to avoid electrical accidents such as conducting Distribution Network Renovation Drive in all Rural areas to set right the network system. Consumers are being educated or warned not to meddle with electrical equipment
39	Another important reason for the electrical accidents in the state, particularly in rural areas, is absence of technical support at the field level when rural folk, particularly farmers, need it. Most of the linemen and assistant lineman posts in rural areas are vacant and when they are there in limited number most of their time goes in billing and bill collection. In the absence of the required technical support in the form of lineman/assistant lineman villagers/farmers themselves try to attend to the repairs and in the course of it meet with fatal accidents. The most the DISCOM employees at the ground level do is issuing LC so that farmers can attend to the problems on their own. In other words villagers/farmers are being forced to walk in to death traps.	It is true that the field level vacancies are existing in the company at certain places. These vacancies will be filled up soon after getting the final verdict on the cases pending in various courts on account of personal recruitment
40	In the past the ERC had allowed the individual DISCOMs to spend Rs. 5 crore from ARR each year on safety measures. But the DISCOMs did not care to spend this amount. This	Measures are being taken to rectify and replace worned out lines, equipments etc., to improve the safety measures and progress is being monitored by the corporate office. The DEs/Technical of respective

	<p>in a way reflects the callous attitude of utility bosses to safety issues. It has to be seen that DISCOMs follow grid code scrupulously in maintaining the electrical network in the state that automatically goes towards bringing down electrical accidents. Providing designated safety officer in DISCOMs will also help to reduce electrical accidents. It is important to make some efforts to reduce deaths even when accidents happen. This calls for first aid training to DISCOM field staff, police etc.</p>	<p>circles were designated as Safety officers.</p>
41	<p>At the same time it is not to deny the importance of creating awareness among electrical consumers, particularly farmers in the state about precautions to be taken. They have to keep the electrical appliances in their premises in order. This can be effectively done when DISCOMs keep their house in order. Those who preach have to practice it first. Is not it?</p>	<p>Farmers are being educated by the local staff and warned not to meddle with live electrical equipment</p>
42	<p>In the context of electrical accidents the role of Chief Electrical Inspectorate's Office is not clear. There is also no clarity on relation between the ERC and the Chief Electrical Inspectorate. This brings in to picture the role of state government also. The state government has to prepare necessary rules to mandate the Chief Electrical Inspectorate to inquire in to all electrical accidents taking place in the state and suggest remedial measures.</p>	<p>Chief Electrical Inspectorate is being informed about the electrical accidents by the discom whenever accident occurs. The CEIG conduct inspections of accident location.</p>
43	<p>The Commission shall institute a study to understand the electrical accidents taking place in the state and formulate action plan to eliminate such incidents. Safety audit, especially of rural distribution by DISCOM or by third party will help to understand the source of the problem and plan measures to reduce accidents. Detailed reports on accidents (location, cause etc), analysis and discussion on them will help to understand where accidents happen (which geographical areas and what part of electrical network) and also possible root causes. Study of construction and operational issues like quality of material, earthing, platforms for DTs, fault clearing etc., which lead to accidents is also important.</p>	<p>In order to rectify old and defective lines/electrical equipment a drive has been taken up especially in rural areas. The DEs/Technical of concerned circles are nominated as safety officers. It is proposed to designate safety audit officer at Corporate office to monitor such cases</p>

S.No.	Summary of Objections / Suggestions				Response of the Licensee
32. Managing Director. HMWSSB, Hyderabad.					
<p>The Board is treated on par with Other industries. The misapplication of the definition of “Industry” consequent to wrongful import of the definition from irrelevant statute and thereby incorrect categorisation has been unduly taxing the Board revenues while depriving it of rightful congenial payment terms and rates.</p> <p>The Concessional power tariff will go a long way for financial sustenance of the Board.</p> <p>The table given below, comparing the tariff levied in Bengaluru and Hyderabad clarifies the needs for re-classification.</p>					
Sl.No.	Nature of the charges/ tariff	Bengaluru	Hyderabad for HMWSSB	Hyderabad for CP Water Supply Schemes	<p>It is to inform that tariff design varies from state to state depending on various factors like average cost of service, cross subsidy, government policy decisions, demand supply gap etc. Hence we cannot equate the tariff with other states.</p> <p>As per the Tariff Order issued by the Hon’ble Commission for FY2016-17, Water Works & Sewerage Pumping Stations operated by Government Departments or Co-operative Societies and pump sets of Railways, pumping of water by industries as subsidiary function and sewerage pumping stations operated by local bodies are categorized under HT-I(A)-Industry Category. Though HT-I category name is Industry, the Hon’ble Commission extended this category tariffs to few other activities like poultry farms, pisciculture prawn culture inclusive of Water Works & Sewerage Pumping Stations operated by Government Departments not to highly burden the consumer as this only the lowest tariff in HT Categories (except LI schemes and agriculture).</p> <p>The HT-IV(B)-Composite Water Supply Schemes category is applicable to energy consumption by HT services pertaining to Composite Protected Water Supply (PWS) schemes in rural areas.</p> <p>As the HMWSSB is in Hyderabad Metropolitan area, the HT-IV(B) category tariffs cannot be made applicable. Further, providing Concessional rates to segment of consumers leads to revenue loss for the Discoms.</p>
1	Category of Billing	Separate category created for BWSSB installations	Industry(HT-I(A))	Industry(HT-IV(B))	
2	Demand charges per KVA	Rs.190/KVA/PM	Rs.390/KVA/PM	Nil	
	11kV 33kV 132kV	- - -	Rs. 6.65/Unit Rs. 6.15/Unit Rs. 5.65/Unit	Rs.5.10/Unit Rs.5.10/Unit	
3	Rate per unit	Rs.4.50/unit	Rs.6.15/unit (Avg)	Rs. 5.10/ Unit	
<p>A special power tariff needs to be provided in view of the legal status of the Board and nature of service rendered to the citizens as mandated under the constitution instead of classifying it as an industry for levy of power tariff.</p>					

<p>The only option left to the Board is to seek remedy through concessional power tariff to reduce high operating cost. Hence our plea to classify water board consumption on par with other state like Bengaluru and/or CP Water Supply Schemes of Telangana. We request to seek 'Amendment of Clause No. 7.5: HT-I(A)-Industry General: Proposed Clause – a special concessional Tariff to HMWSSB' to the draft Tariff Proposal submitted by TSSPDCL to TSERC.</p>	
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S.No.	Summary of Objections / Suggestions	Response of the Licensee
33. The Federation of Telangana and Andhra Pradesh, Chambers of Commerce and Industry, Federation House, FAPCCI Marg, Red Hills, Hyderabad-500004, Telangana, India, Tel:+91 40 23395515 to 22.		
1	True-up of previous year with Impact of the UDAY scheme on the same is yet to be submitted by the Petitioner.	In view of the GoTS taking over 75% of outstanding loans as on 30 th Sept 2015 by the end of FY2016-17 as per the UDAY MoU, the licensees are not seeking the true-ups for 1 st and 2 nd control periods and for FY2014-15. The Discoms requested the Hon'ble Commission to permit the licensees to file for final true-up for FY2015-16 and FY2016-17 during the ARR filing for FY2018-19 after assessing the impact of loans taken over by the Government and additional support from the Government. However, the Discoms have filed the true-ups of 1 st and 2 nd control period during the ARR filing for FY2016-17.
2	Finalisation of the Tariff Petition of Telangana State Power Generation Corporation Limited (TSGENCO) before approval of Retail Tariff-TSGENCO has filed its Petition for 2014-19 tariff period in and around November-2016 and the same is yet to be decided by the TSERC. It is urged that till the fixed charges are not determined for the TSGENCO stations, the latest approved costs for these stations be considered for arriving at the corresponding power procurement costs.	Under the purview of the Hon'ble Commission.
3	Power Purchase cost – The Capital cost of Singareni Collieries Company Limited (SCCL) has still not been approved by the Hon'ble State Commission; however the same has been considered by the State Licensees amounting to Rs.3073 Crore during FY2017-18.	For SCCL, the licensee has considered a fixed cost per unit of Rs.2.15/kWh and variable cost per unit of Rs.1.80/kWh for FY2017-18.
4	Revenue from Sale of surplus power- The Petitioner has not projected any revenue from sale of available surplus power, where the surplus shown in FY 2017-18 is to the tune of 11320 MUs.	The surplus as reflected in the filings may not be really turn to be absolute surplus in terms of load requirements as there will be lot of uncertainties associated with weather, rainfall etc. in real time

		<p>scenario that affect the demand and also may differ from the forecasted load demand.</p> <p>However, if the licensee gets any Revenue from sale of surplus power it will be adjusted while filing the Power Purchase True up for 2017-18 to the Honble Commission.</p>
5	<p>Claim for incentives- there is no occasion for payment of any generation incentive or consideration of the same in advance for the forthcoming year FY 2017-18 when the actual generation in previous year has been lower than the approved generation.</p>	<p>Based on the availability projections of each Generator projected in the ARR filings, the incentives are calculated for each Generator as per the applicability.</p>
6	<p>Voltage wise cost of service-FTAPCCI has repeatedly submitted in Various objections that though the Licensee calculates the category-wise CoS for all classes of consumers, it does not use the same to determine tariffs. This renders the exercise of calculating the category-wise CoS futile and misleading. Further the Licensees have not been able to adhere to the mandate by the Tariff Policy of designing tariff at $\pm 20\%$ of the average cost of supply. As per the provisions of the Electricity Act and Tariff Policy, the subsidizing consumers such as industrial consumers cannot be penalized, for making good the cost, to be recovered from the subsidized category beyond the permissible $\pm 20\%$ of the average cost of supply. Any benefit which the licensee wants to confer to the subsidized category beyond the maximum of $\pm 20\%$ can and should be recovered through Government subsidy and cannot in any way be loaded to the subsidizing consumers. Though, no revision has been sought in tariff, the same is not reflective of the category wise cost of supply of consumers.</p>	<p>With regard to the comparison of CoS w.r.t. the Tariff, it is to inform that the tariff need not be the mirror image of actual cost of supply or voltage-wise/category-wise cost of supply. Licensees are obligated to provide supply to all categories of consumers, including subsidised consumers. As per the National Tariff Policy, the tariffs to the consumers are to be fixed at $\pm 20\%$ of COS. Hence it is deemed that the consumers whose tariffs are fixed over and above COS will cross subsidize the consumers whose tariffs are below COS to ensure revenue neutrality.</p> <p>However, as per the Tariff Policy, Licensee has put all efforts while proposing tariffs to be within $\pm 20\%$ of the average cost of supply wherever it is possible.</p>
7	<p>Time of day incentive- In response to the plea of the Objector during previous years filing for including an incentive structure in the ToD tariffs to enable the consumers to shift their demand to off-peak periods, the Commission had directed the distribution</p>	<p>As per the Tariff Order for FY2016-17, ToD incentive of Rs.1/- per unit during the period 10PM to 6AM for HT-I, II & III categories is already being implemented from 01.07.2016.</p>

	companies to examine and take a view on incentivizing off-peak consumption. The distribution companies have not submitted any analysis in this regard.	
8	<p>TSSPDCL in the instant ARR Petition for FY 2017-18 has filed the computations towards category wise cost of service using embedded cost approach by assuming that the system peak demand is occurring at 13.00hrs. However, TSNDPCL has filed the computations towards category wise cost of service using embedded cost approach by adopting the average method (taking the average of morning peak and evening peak). In this regard, the relevant extract from the petition of TSSPDCL is reproduced below:</p> <p><i>“6.211 The load factor and coincidence factor included in the Model for each category are assumed based on a review of the characteristics of the loads and load mix in TSSPDCL. The system peak demand of TSSPDCL is occurring during 13.00 hrs.”</i></p> <p>Similarly, the relevant extract from the Petition of TSNDPCL is reproduced below:</p> <ul style="list-style-type: none"> • “The system peak demand of TSNDPCL is occurring during Morning hours due to Agricultural loads • During the morning peak occurrence, the coincidence factor of agriculture is 100% and the same is reduced to zero at the time of evening peak <p><i>Based on above consideration, it is felt that average demand method would be suitable for allocation of costs to consumer categories since it allocates the cost equitably on all consumer categories based on morning and evening peak loads.”</i></p>	TS Discoms have determined the category wise CoS based on the average of morning and evening peak loads only.
9	It is pointed out, that the Hon’ble Commission while approving the category wise cost of service in the FY 2016-17 tariff order, had considered only the evening peak which in our view was erroneous and did not reflect the fact that significant demand related	Under the purview of the Hon’ble Commission.

	expenses of power purchase and other items have been incurred to cater to the agricultural loads as well.	
10	The Objector submits that the correct approach to compute category wise cost of service is through the system peak method and not the average method. The system peak ought to be considered as significant demand related expenses of power purchase and other items have been incurred to cater to the agricultural loads that lead to occurrence of such system peak.	TS Discoms are providing 9 hrs continuous power supply to the agriculture consumers during the day time. During the Peak hours Discoms are not providing power supply to agriculture sector. In view of the restricted power supply to agriculture consumers, the peak demand occurred may not be the real peak demand. Therefore, Discoms have taken the Average of Morning and evening peaks to arrive at the Cost of service.
11	In view of the same, it is pertinent that the system peak method be adopted for estimating the category wise cost of service.	Further peak load is seen only for few minutes in a day and the annual load factor is around 66 % for Telangana against national average of 80%. Hence, Licensee humbly submits that usage of average peak is the appropriate method

S.No.	Summary of Objections / Suggestions	Response of the Licensee
34. D.Narshimha Reddy, 201, Aarthi Residency, LN Colony, Saidabad, Hyderabad-500059 35. Anvesh Reddy, 602, C block, kalki gardence, madeenaguda, miyapur-500050 36. M.Kodanda Reddy, Chairman, Kisan-kheth Mazdoor congress, Telangana Pradesh Congress Committee, Gandhi Bhavan, Nampally, Hyderabad-500001		
1	<u>REGULATORY ISSUES:</u> The TSDISCOMs are reported to have submitted tariff proposals for the financial year 2017-18 on 13 th April 2017 though ARR were submitted on 30 th November 2016 without tariff proposals was against the Spirit of Electricity Act, 2003 and various provisions.	TS Discoms have submitted all the crucial information to the Honble Commission for determining the ARR of the Discoms. Further, TS Discoms have submitted additional information on ARR filings for FY 2017-18 as directed by the Hon'ble Commission and the same is available in the website of TS Discoms. TSDiscoms have submitted the Tariff proposals to the Honble Commission on 13 th April, 2017. The delay in Tariff filing has happened as the Discoms are in the process of entering into a tripartite agreement with GoTS and GoI for joining the UDAY scheme and study the impact of the UDAY scheme in the True up filings and in view of the Tariff rationalization process initiated by Ministry of Power.
2	DISCOMs filed applications before the Commission and sought extension of time for filing tariff proposals from time to time. There is a delay of more than four months in submitting the tariff proposals before TSERC.	The licensee has sought additional time for filing of tariff proposals due to the following reasons:
3	TSERC in its Tariff Order for the FY 2015-16 observed: "the delay in filings caused difficulties not only to objectors and consumers but also to the Commission. The Licensees shall make every effort to file ARR & Tariff Proposals 120 days before the effective date of Tariffs as per Sec.64 of the Electricity Act, 2003" (para 4.2.3). Furthermore, the Commission had directed the DISCOMs, "the Discoms are directed to submit the ARR and Tariff proposals in time i.e. by 30 th November of current year in order to make the Tariff Order effective from 1 st April of next year" (Directive 7.9 at page 237 of tariff order for 2015-16). The Commission by	<ul style="list-style-type: none"> c) Ministry of Power (MoP), Government of India (GoI) had constituted a committee for examining and recommending options for simplification an rationalization of consumer categories and tariff. d) Government of Telangana (GoTS) had conveyed its intention of joining UDAY scheme; however the MoU was not signed at the time of ARR filing. Subsequently, the licensee has entered into tripartite agreement with GoTS and GoI on 4th January, 2017. Though the licensee had put in all efforts for filing the tariff proposals on time, the delay in tariff filing was mainly attributable to the above factors. However the TS Discoms have filed the ARR in time i.e., on 30 th November in order to comply with the directive of TSERC.

	allowing the applications of DISCOMs to delay tariff proposal filings appears to have violated its own orders/directions in this regard.	
4	For the FY 2016-17 as well as FY 2017-18 DISCOMs have shown the UDAY scheme as one of the reasons for delay in filing tariff proposals. But one of the conditions laid down under UDAY scheme is that DISCOMs shall file tariff proposals in time so that new tariffs will come in to force from the first day of the ensuing financial year. In the recent ranking of DISCOMs in the country TSDISCOMs have got lower rankings because of delay in filing tariff proposals.	After Government of Telangana (GoTS) had conveyed its intention of joining UDAY scheme; the licensee has entered into tripartite agreement with GoTS and GoI on 4 th January, 2017. The licensee is putting all efforts for filing of tariff proposals in time whereas the delay in filings is attributable to certain uncontrollable factors which are being explained in the filings. However, TS Discoms have filed the ARR for FY17-18 in time to avoid the delay in filings.
5	” The Secretary of the Commission through the circular Lr. No. TSERC / Secy / F-No.ARR2017-18/5 / D.No.879 / 17. Date:17.02.2107 intimated the TSDISCOMs as follows, “For the above said reasons, I am directed by the Commission to require you to file tariff proposals on or before 23.02.2017 and in default, the Commission will act suo moto for determination of the tariff for FY 2017-18 in accordance with the directions of the Hon’ble Appellate Tribunal for Electricity in O. P. No. 1 of 2011 based on information available with the Commission in the form of ARR / FPTs for FY 2015-16 and FY 2016-17 and ARR for FY 2017-18. The Commission will reckon the information filed by licensees after commencement the suo moto proceedings for determination of the retail supply tariff for FY 2017-18”.	-
6	Though the TSDISCOMs did not file tariff proposals by 23-02-2017 the Commission did not initiate any action suo moto to commence tariff determination process for the FY 2017-18. The Commission should have gone ahead with suo motu process as indicated in the above Circular.	TS Discoms have submitted additional information on ARR filings and Tariff Proposals for FY 2017-18 as directed by the Hon’ble Commission and the same is available in the website of TS Discoms. Further additional information required if any will also be submitted as per the directions of the Hon’ble Commission. However, there is no significant financial impact on revenue of the Discoms due to the proposed changes in the definition of the consumer categories.
7	Following the Clause 8.1 (7) of the National Electricity Policy 2016 quoted in the above Circular the Commission has to see that “any gap on account of delay in filing should be on	The Discoms are putting all its efforts for filing of ARR & Tariff proposals in time.

	account of licensee”. The Commission has to see that from the coming financial year the TSDISCOMs file the tariff proposals in full in time.	
8	<p><u>ELECTRICITY REQUIREMENT ESTIMATES:</u></p> <p>Power requirement estimate for 2017-18 is higher than previous years’ experience. Both DISCOMs in Telangana projected high growth rates in electricity consumption during the ensuing financial year 2017-18. SPDCL attributed this growth to additional power required for water grid, Hyderabad Metro Rail, 9 hour power supply to agriculture pumpsets and new lift irrigation schemes. Similarly, NPDCL also attributed this growth to additional power required for water grid, 9 hour power supply to agriculture pumpsets and new lift irrigation schemes. While SPDCL estimated growth rate of 9.42% NPDCL arrived at 12.05% growth rate in electricity consumption under its area. Further, NPDCL also estimated 26.16% growth rate in electricity consumption by HT services compared to 8% growth rate during the previous year. During the preceding year (2016-17) growth in consumption under SPDCL is less than 33% of this. In the case of NPDCL it was less than 60% the expected growth during 2017-18. This historical experience demands a relook at the consumption growth estimated by both the DISCOMs.</p>	<p>The Discom has considered the historical growth trend observed in sales of each category since five years and hence adopted a moderate growth rate for projecting the sales in FY2017-18. In addition, higher growth of sales are projected in certain categories as shown below:</p> <ul style="list-style-type: none"> e) A higher growth rate of 10.83% is observed in the agriculture sales in H1 of FY16-17 over H1 of FY15-16, on account of releasing 54,717Nos of Agl. Service connections in FY15-16 against the target of 50,000Nos in addition to the extension of 9hrs power supply to agriculture consumers from 01.04.2016 as per the policy of GoTS. Further, the target for release of Agl. Connections for FY16-17 are 64,730Nos as against which 74,946 nos services are released. Considering the same per HP consumption for ensuing year and keeping in view the increase in number of Agl. Connections and continuation of 9hrs power supply, a growth rate of 6.5% is adopted for projecting the sales in FY17-18. f) Higher growth rate is projected in HT Industrial sales expecting that a substantial portion of open access consumers will come back to the grid. g) Higher growth rate is projected for HMR Traction category expecting a load of 12.44MU in FY17-18, as communicated by L&T-HMR. h) Higher growth rate is projected in HT-IV category on account of upcoming LI schemes of 192MVA with a consumption of 276MU in FY17-18, based on the information given by the Irrigation Department.
9	Out of 54,756 MU of being procured in the state of Telangana 12,907 MU will be supplied to agriculture wells. In other words LT agriculture will be accounting for 23.57% of the power consumption in the state. In the case of TSSPDCL agriculture wells will be accounting for 19.89% of	The agricultural consumption is assessed based on the ISI methodology approved by the Hon’ble Commission.

	electricity consumption and in the case of TSNPDCL it will be 32.25%. Despite such significant consumption by this sector the basis on which this consumption is estimated still raises many doubts.											
10	Both the DISCOMs estimated failed to integrate information that ground water levels already declined and results per day electricity consumption in the state declined from 160 MU to 130 MU..	<p>A higher growth rate of 10.83% is observed in the agriculture sales in H1 of FY16-17 over H1 of FY15-16, on account of releasing 54,717Nos of Agl. Service connections in FY15-16 against the target of 50,000Nos in addition to the extension of 9hrs power supply to agriculture consumers from 01.04.2016 as per the policy of GoTS. Further, the target for release of Agl. Connections for FY16-17 are 64,730Nos. Considering the same per HP consumption for ensuing year and keeping in view the increase in number of Agl. Connections and continuation of 9hrs power supply, a growth rate of 6.5% was adopted for projecting the sales in FY17-18.</p> <p>Further, it is observed that 74,946Nos of services were released in FY16-17 upto 31st March, 2017 against the target of 64,730Nos and the actual Sales volume has also increased to 8768MU against the projection of 7177MU in FY16-17.</p>										
11	There is apprehension that T&D losses are being shown as agriculture consumption and that subsidy is going to support inefficient functioning	<p>It is to submit that agricultural consumption in TSSPDCL is arrived based on effective implementation of ISI suggested methodology approved by the Honourable ERC.</p> <p>This method is as described below.</p> <p>M/s. Indian Statistical Institute has randomly picked up some Agl DTRs as samples from rural circles. For all these sampled DTRs, 0.5 S class LTCT meters were fixed, so that load surveys of the DTRs can be dumped on a monthly basis. The working condition of the above meters is shown below</p> <table border="1"> <thead> <tr> <th>Sl.No.</th> <th>Circle</th> <th>No.of ISI sample DTRs</th> <th>No.of Valid DTRs (working)</th> <th>% Working DTRs</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Nalgonda</td> <td>840</td> <td>684</td> <td>81.43%</td> </tr> </tbody> </table>	Sl.No.	Circle	No.of ISI sample DTRs	No.of Valid DTRs (working)	% Working DTRs	1	Nalgonda	840	684	81.43%
Sl.No.	Circle	No.of ISI sample DTRs	No.of Valid DTRs (working)	% Working DTRs								
1	Nalgonda	840	684	81.43%								

2	Medak	261	261	100.00%
3	Mahabubnagar	609	393	64.53%
4	Siddipet	344	308	89.53%
5	RR East	57	57	100.00%
6	RR North	38	38	100.00%
7	RR South	164	164	100.00%
	TOTAL	2313	1905	82.36%

82.36% Valid DTRs (in working condition) are available for the month of Feb'17.

- The consumption per month at each of the sample DTR is measured. The average consumption per DTR is then estimated (i.e.) total consumption of all the sample DTRs / Number of sample DTRs in each circle (capacity wise DTRs).
- Per DTR consumption in each capacity of DTR population is the basis for extrapolation of the agricultural consumption. (i.e.) total number of Agl. DTRs in the circle multiplied by the average consumption per DTR of the circle.
- While taking the readings of sample DTRs, MRI dumps are also taken. Only those sample DTRs showing all the voltages and currents in the three phases (called valid DTRs) are considered for assessment of consumption.
- As directed by the Hon'ble Electricity Regulatory Commission, meters were installed for 10% of sample size (i.e. 225 Nos.) in addition, so as to increase the number of valid DTRs to be considered for assessment of consumption

12	<u>T&D LOSSES:</u>	The Energy requirement is arrived duly considering the approved losses
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	T&D loss levels in both the DISCOMs continue to be high..	<p>and projected sales for FY16-17 and FY17-18, which is detailed in section 3.2.4 of chapter 3 of ARR Filings. The cumulative Distribution losses and total T&D (Transmission & Distribution) losses of TSSPDCL for FY16-17 and FY17-18 are tabulated below for reference:</p> <table border="1" data-bbox="1352 342 2314 529"> <thead> <tr> <th>Description</th> <th>FY16-17</th> <th>FY17-18</th> </tr> </thead> <tbody> <tr> <td>Cumulative Distribution Losses (%) (including EHT sales)</td> <td>10.26</td> <td>9.84</td> </tr> <tr> <td>Total T&D Losses (%)</td> <td>15.30</td> <td>14.54</td> </tr> </tbody> </table> <p>Hence, the T&D losses in FY17-18 are lower compared to that in FY16-17.</p>	Description	FY16-17	FY17-18	Cumulative Distribution Losses (%) (including EHT sales)	10.26	9.84	Total T&D Losses (%)	15.30	14.54																		
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13	Distribution/commercial losses in Hyderabad South Circle continue to be more than 40%.	<p>Intensive inspections are being conducted on high loss feeders in the Hyderabad South Circle continuously to curb the theft and to reduce the losses. The number of cases booked in Hyderabad South Circle every year and the assessment amount along with details of persons who committed second offence is shown below:</p> <table border="1" data-bbox="1352 829 2475 1203"> <thead> <tr> <th rowspan="2">Sl.No</th> <th rowspan="2">Period</th> <th colspan="2">Total Cases booked</th> <th rowspan="2">No. of persons arrested (Second offence)</th> </tr> <tr> <th>No.</th> <th>Amount (in Lakhs)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Apr 2013 - Mar 2014</td> <td>9805</td> <td>570</td> <td>7</td> </tr> <tr> <td>2</td> <td>Apr 2014 - Mar 2015</td> <td>11157</td> <td>901</td> <td>8</td> </tr> <tr> <td>3</td> <td>Apr 2015 - Mar 2016</td> <td>8669</td> <td>475</td> <td>14</td> </tr> <tr> <td>4</td> <td>Apr 2016 - Mar 2017</td> <td>11169</td> <td>680</td> <td>23</td> </tr> </tbody> </table> <p>The intensive inspections are being conducted continuously after the Hon'ble High court orders and continuous efforts are being made by the officers and staff of TSSPDCL to reduce the distribution losses in Hyderabad South circle.</p>	Sl.No	Period	Total Cases booked		No. of persons arrested (Second offence)	No.	Amount (in Lakhs)	1	Apr 2013 - Mar 2014	9805	570	7	2	Apr 2014 - Mar 2015	11157	901	8	3	Apr 2015 - Mar 2016	8669	475	14	4	Apr 2016 - Mar 2017	11169	680	23
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14	<u>ENERGY EFFICIENCY:</u>																												

	<p>The Telangana State government has entered in to an agreement with the central government to implement Power for All programme. This includes energy conservation and energy efficiency interventions. Both the DISCOMs in Telangana have launched several energy efficiency initiatives. This programme targets to replace 19.4 lakh pumpsets with star rated energy efficient pumpsets. About 20,000 pumpsets are expected to be replaced in 2016 and will be completed by 2021. Under DELP segment all households in the state will be provided two LED bulbs. Implementation will start this year with coverage of 20 lakh households. All households will be covered by 2019. Energy savings from these schemes shall be taken in to account while arriving at the total quantum of power needed in the state.</p>	<p>TSSPDCL has decided to implement the pilot project of Agricultural DSM to replace 3299 nos low efficiency agriculture pumpsets with 5 star rated (high efficiency) pumpsets in Medak circle. M/s. Energy Efficiency Service Ltd. (EESL), a joint venture company of PSUs of Ministry of Power under Government of India has carried out survey for agriculture pumpsets on sample basis and submitted a DPR. Agreement to be concluded with M/s. EESL shortly for implementation of Agricultural DSM programme to 3299 Nos. agriculture pumpsets in Medak District for an amount of Rs. 12.30 crores and the project shall be completed 6 to 8 months. Further, a Purchase Order was placed on M/s. EESL for supply of 2,78,000 Nos. 9 W LED bulbs for TSSPDCL. Each household is being provided with 2 Nos. of 9 Watt LED bulbs. The LED bulbs are being distributed in 15 Nagara panchayats under DELP Scheme. The Distribution of LED bulbs as on 18.05.2017 is shown below.</p> <table border="1" data-bbox="1349 789 2134 906"> <thead> <tr> <th>Proposed</th> <th>Distributed</th> <th>Balance to be distributed</th> </tr> </thead> <tbody> <tr> <td>278006</td> <td>263738</td> <td>14268</td> </tr> </tbody> </table> <p>The energy savings by implementing the above schemes will be considered in estimating the energy requirement of the Discoms during the next year as the schemes are at nascent stage.</p>	Proposed	Distributed	Balance to be distributed	278006	263738	14268
Proposed	Distributed	Balance to be distributed						
278006	263738	14268						
15	<p>These energy efficiency initiatives will impact expenditure and revenues of the DISCOMs. All information related to these programmes shall be shared with the public. These shall be cleared by the Commission after holding public hearings as being done in the neighbouring state of Andhra Pradesh.</p>							
16	<p>It is clear that surplus from all sources is higher than that available from market sources. This implies that there is no need for procurement from market at all. Even without market purchases there will be surplus during the two months when demand will be high.</p>	<p>In order to meet the increasing demand during some specific days/months and to provide uninterrupted power supply to all categories of consumers, the Discom has mentioned in the filings that it may opt for short term power procurement if required in FY17-18. However, the Discom has not proposed any market purchases due to</p>						

	<p>The question is – is there need to mention it in the ARR? At some places in ARR it is mentioned that the DISCOMs may go in for purchases from the market if need arises: “Bilateral/Inter-State purchases: The licensee has not proposed any additional purchase of power through bilateral/ inter-state purchases for the FY 2017-18. However licensee may opt for procurement of power during specific days/ month depending on demand to ensure the stability of the grid and also to ensure uninterrupted power supply to all categories of consumers in the State.” (TSSPDCL, p. 39)</p>	<p>surplus power available in FY17-18. Further, the surplus as reflected in the filings may not be really turn to be absolute surplus in terms of load requirements as there will be lot of uncertainties associated with weather, rainfall etc. in real time scenario that affect the demand and also may differ from the forecasted load demand.</p>
17	<p><u>ELECTRICITY TARIFF ISSUES:</u> In the tariff proposals filed by the TSDSCOMs the Commission was requested to retain the tariffs as per the Tariff order of FY 2016-17. Through these proposals they also proposed changes to some consumer categories. But these filings did not mention the revenues at current tariffs and categories and revenues at the current tariffs and the proposed changes to the consumer categories. Without this information it will not be possible to have an idea whether the current tariffs will be enough to recover ARR. Whether there will be enough to fill the revenue gap. According to TSDISCOMs filings total ARR for FY 2017-18 stands at Rs. 31,930.45 Crore.</p>	<p>There is no significant financial impact on revenue of the Discoms due to the proposed changes in the definition of the consumer categories. The Licensee has filed ARR and Tariff proposals for FY2017-18 before the Hon’ble commission and submitted additional information as per the directions of Hon’ble commission. The Honble Commission considering the Discom proposals and the views of the stakeholders during public hearing will determine the tariffs and requirement of government subsidy to bridge the revenue gap if any.</p>
18	<p><u>ELECTRICAL ACCIDENTS</u> One of the important reasons for the electrical accidents in the state is lack of proper maintenance of electrical network that is resulting in snapping of conductors and distribution transformer blow outs. Age old electrical poles and conductors are not being replaced as required. This is resulting in sagging and snapping of conductors which have become death traps.</p>	<p>Measures are being taken to avoid electrical accidents such as conducting Distribution Network Renovation Drive in all Rural areas to set right the network system. Consumers are being educated or warned not to meddle with electrical equipment</p>
19	<p>At the same time it is not to deny the importance of creating</p>	<p>Farmers are being educated by the local staff and warned not to</p>

	<p>awareness among electrical consumers, particularly farmers in the state about precautions to be taken. They have to keep the electrical appliances in their premises in order. This can be effectively done when DISCOMs keep their house in order. Those who preach have to practice it first. Is not it?</p>	<p>meddle with live electrical equipment</p>
<p>20</p>	<p>The Commission shall institute a study to understand the electrical accidents taking place in the state and formulate action plan to eliminate such incidents. Safety audit, especially of rural distribution by DISCOM or by third party will help to understand the source of the problem and plan measures to reduce accidents. Detailed reports on accidents (location, cause etc), analysis and discussion on them will help to understand where accidents happen (which geographical areas and what part of electrical network) and also possible root causes. Study of construction and operational issues like quality of material, earthing, platforms for DTs, fault clearing etc., which lead to accidents is also important.</p>	<p>In order to rectify old and defective lines/electrical equipment a drive has been taken up especially in rural areas. The DEs/Technical of concerned circles are nominated as safety officers. It is proposed to designate safety audit officer at Corporate office to monitor such cases</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee								
37.	<p>P.S.R.Krishna Prasad, #5-5-23/45, Sangeeth Nagar, Kukatpally, Hyderabad-500072, Cell: 8096008077</p> <p>ప్రస్తుతమున్నవిధానంలో 100 యూనిట్లుదాటితే రూ. 127.50, 200 యూనిట్లు దాటితే రూ. 240.00 అదనంగా చెలించవలసివస్తుంది.</p> <p>101 వ యూనిట్ చార్జి రూ. 131.80 లు, 201 యూనిట్ చార్జి రూ.247.20 అవుతుంది.</p> <p>ఉదాహరణకు-35 రోజులకు 210 యూనిట్లు కాలితే నెలకు (30రోజులకు) 180 యూనిట్లకు రూ.674.00 అవుతుంది. ఆదనంగా కాలిన యూనిట్లకు కూడ మిగిలిన 30 యూనిట్లకు యూనిట్ కు రూ.4.30 చొప్పున రూ 129.00 కలిపి మొత్తం 803.00 చార్జి చేస్తారు.</p> <p>అదే 25 రోజులకు 175 యూనిట్లు కాలినపుడు బిల్లు చేయటానికి వస్తే దామాషా ప్రకారం నెలకు 210 యూనిట్లు అవుతుంది కనుక LT-I(B)ii ప్రకారం రూ. 875.00 అవుతుంది. అంటే ఒక నెలలో 210 యూనిట్లకు రూ.803 లు అయితే మరుసటి నెలలో 175 యూనిట్ల కు రూ.875/-లుఅవుతుంది. దీనికి చార్జీలు అదనం. ఈ విధానంలో చేస్తున్న బిల్లులు చూసి ప్రజలు ఆశ్చర్యపోయి ఉద్యోగులను ప్రశ్నించి కంగారు పెడుతున్నారు.</p> <p>కనుక దయతో ఒకే టేబుల్ (పట్టిక) ను ఉంచి టేలిస్కోపిక్ విధానాన్ని అమలు చేయాలి.</p> <p>విద్యుత్ శాఖల లోని అధిక సంఖ్యలో ఉద్యోగులు సైతం ఇదే కోరుకుంటున్నారు.</p> <table border="1" data-bbox="306 1060 1381 1425"> <thead> <tr> <th colspan="4" data-bbox="306 1060 1381 1117">2016-17 ఆర్థిక సంవత్సరానికి రిటైల్ సరఫరా చార్జీల షెడ్యూల్</th> </tr> </thead> <tbody> <tr> <td data-bbox="306 1117 655 1425">వినియోగదారుని విభాగం</td> <td data-bbox="655 1117 889 1425">ఎనర్జీ యూనిట్</td> <td data-bbox="889 1117 1131 1425">ఫిక్స్డ్ / డిమాండ్ చార్జీలు (రూ / కెడబ్ల్యు / హెచ్ .పి / కెవిఎ / నెల)</td> <td data-bbox="1131 1117 1381 1425">ఎనర్జీ చార్జీలు (రూ.లు / యూనిట్)</td> </tr> </tbody> </table>	2016-17 ఆర్థిక సంవత్సరానికి రిటైల్ సరఫరా చార్జీల షెడ్యూల్				వినియోగదారుని విభాగం	ఎనర్జీ యూనిట్	ఫిక్స్డ్ / డిమాండ్ చార్జీలు (రూ / కెడబ్ల్యు / హెచ్ .పి / కెవిఎ / నెల)	ఎనర్జీ చార్జీలు (రూ.లు / యూనిట్)	<p>లైసెన్సీ వారు డొమెస్టిక్ కేటగిరి నందు టేలిస్కోపిక్ విధానమునే అనుసరిస్తున్నారు. తక్కువ వినియోగం ఉన్న మధ్య తరగతి వినియోగదారులపై భారం పడకుండా స్లాబులు నిర్ణయించడమైనది. నెలకు 100 యూనిట్ల వరకు వినియోగించే గృహ వినియోగదారులకు చార్జీలు పెంచకుండా, తెలంగాణ ప్రభుత్వం సబ్సిడీ ను అందిస్తున్నది. కావున గృహ వినియోగ క్యాటగిరీ నందు, నెలకు 100 యూనిట్ల వినియోగం వరకు ప్రత్యేక విభాగాన్ని పొందుపరచడమైనది. ఆ పైన నెలకు 100-200 యూనిట్లు వినియోగించే వారికి అదనపు భారం పడకుండా ప్రత్యేక విభాగాన్ని ఏర్పాటు చేయడం జరిగింది. కావున గృహ వినియోగ క్యాటగిరీ నందు ఒకే పట్టికను అనుసరించడం వీలు కాదు.</p> <p>మరియు ఆర్థిక సంవత్సరం 2016 -17 లో గృహ వినియోగ క్యాటగిరీకి విద్యుత్ సరఫరా వ్యయం యూనిట్కు రూ. 7.17 ఉండగా, నెలకు 200 యూనిట్ల వరకు వినియోగించే వినియోగదారులనుండి అంతకంటే తక్కువ ధరను వసూలు చేయబడుతుంది. దీని వ్యత్యాసాన్ని ఇతర స్లాబులు మరియు క్యాటగిరీ వినియోగదారులు క్రాస్ సబ్సిడీ చేయుచున్నారు.</p> <p>టారిఫ్ విధానం మరియు చార్జీలపై తుది నిర్ణయం గౌరవనీయ కమిషన్ పరిధిలోనిది కమిషన్ వారు ఆదేశాలమేరకు నెల రోజుల వినియోగానికి బిల్లింగ్ జరిగే విధంగా బిల్లింగ్ విధానాన్ని సవరించడం జరిగింది బిల్లుకు బిల్లుకు మధ్య ఉండే రోజుల ఆధారంగా దామాషా పద్ధతి ప్రకారం వినియోగదారుని స్లాబ్ నిర్ణయించి బిల్లులు జారీ చేయుట జరుగుతుంది. దీని ద్వారా వినియోగదారునికి ఎటువంటి నష్టం జరగదు మరియు ఖచ్చితమైన బిల్లు జారీ చేయబడును.</p>
2016-17 ఆర్థిక సంవత్సరానికి రిటైల్ సరఫరా చార్జీల షెడ్యూల్										
వినియోగదారుని విభాగం	ఎనర్జీ యూనిట్	ఫిక్స్డ్ / డిమాండ్ చార్జీలు (రూ / కెడబ్ల్యు / హెచ్ .పి / కెవిఎ / నెల)	ఎనర్జీ చార్జీలు (రూ.లు / యూనిట్)							

ఎల్.టి./గృహవసరం			
ఎల్.టి.1(ఎ) నెలకు 100యూనిట్ల వరకు			
మొదటి50 యూనిట్లు	కె.డబ్ల్యు.హెచ్	0.00	1.45
51-100	కె.డబ్ల్యు.హెచ్	0.00	2.60
ఎల్.టి.1(B)i నెలకు100 యూనిట్లపైనమరియు200 యూనిట్లవరకు			
మొదటి100 యూనిట్లు	కె.డబ్ల్యు.హెచ్	0.00	3.30
101-200	కె.డబ్ల్యు.హెచ్	0.00	4.30
ఎల్.టి.1(B)ii నెలకు200 యూనిట్లపైన			
మొదటి200 యూనిట్లు	కె.డబ్ల్యు.హెచ్	0.00	5.00
201-300	కె.డబ్ల్యు.హెచ్	0.00	7.20
301-400	కె.డబ్ల్యు.హెచ్	0.00	8.50
401-800	కె.డబ్ల్యు.హెచ్	0.00	9.00
800 పైన	కె.డబ్ల్యు.హెచ్	0.00	9.50

S.No.	Summary of Objections / Suggestions	Response of the Licensee
38.Munnuru Jayapal Reddy, President, Palamoor R.O.Water Plant Association. Cell No.9703637955		
1.	RO ప్లాంట్ యజమానులకు నోటీసు ఇవ్వకుండా క్యాటగిరీ -II గా మార్చినారు. మరల క్యాటగిరీ -III గా మార్చినారు. ఈ మధ్య కాలంలో బ్యాక్ బిల్లింగును వేసినారు. అట్టి బకాయిలను వెంటనే చెల్లించమని అధికారులు వత్తిడి చేయుచున్నారు. హియరింగ్ తేదీ వరకు ప్లాంటుకు విద్యుత్ నిలుపుదల చేయకుండా చేయగలరని ప్రార్థన.	2016 సం. లో ఆర్. ఓ వాటర్ ప్లాంట్స్ అసోసియేషన్ వారు చేసిన అభ్యర్థన ప్రకారం, లైసెన్స్ ఆర్. ఓ వాటర్ ప్లాంట్స్ ను 2016 -17 ARR ఫైలింగ్స్ లో LT-III పారిశ్రామిక క్యాటగిరీ నందు చేర్చాలని కమిషన్ వారిని కోరారు. గౌరవ కమిషన్ వారు దానిని పరిశీలించి 2016 -17 టారిఫ్ ఆర్డర్ లో నీటి శుద్ధి సంస్థలను LT-III(i) పారిశ్రామిక క్యాటగిరీ క్రింద చేర్చినారు. టారిఫ్ ఆర్డర్ 2016 -17 ముందు వరకు రిటైల్ సరఫరా చార్జీల నిర్వచనం ప్రకారం, ఆర్. ఓ వాటర్ ప్లాంట్స్ LT-II గృహీతర/వాణిజ్య క్యాటగిరీ నందు వర్గీకరించబడింది.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
39. Sri. R. Punnamacharyulu, President, Akhila Bharatiya Viswa Karma Parishat, Telugu Bharath Nilayam , # 16-10-1060, Shiv Nagar, Warangal		
1.	ప్రస్తుతం అమలులో ఉన్న 10 HP లోపు విద్యుత్ వాడకం గల మా విశ్వకర్మీయ కుటీర పరిశ్రమలైన కమ్మరం/Black Smith, వడ్రంగం/Carpentry, కంచరం/Brass Smith, శిల్పి/Stone Architect, స్వర్ణకార/Gold Smith, కుటీర పరిశ్రమలకు ఆధునిక పరికరాల వినియోగం పెరిగినందున 10 HP నుండి 15 KW వరకు దయతో పెంచుట గురించి.	కుటీర పరిశ్రమల యొక్క విద్యుత్ ఆవశ్యకతను బట్టి కనెక్టెడ్ లోడ్ పరిమితిని నిర్ధారించడం జరుగుతుంది. దానికి అనుగుణంగా టారిఫ్ ఆర్డర్ 2013 -14 లో గౌరవనీయ కమిషన్ వారు కుటీర పరిశ్రమ క్యాటగిరీ యొక్క గరిష్ట కనెక్టెడ్ లోడ్ పరిమితిని 5HP నుండి 10HP కి పెంచడం జరిగినది.
2.	10 HP లోపు విద్యుత్ వాడకం గల కమ్మరం/Black Smith కుటీర చిరు పరిశ్రమలను వెల్డింగ్ షాపుల పేరుతోనూ, ఇంజనీరింగ్ వర్క్స్ ల పేరుతోనూ మరియు ఇంజనీరింగ్ & ఐరన్ వర్క్స్ ల పేరుతోనూ విద్యుత్ శాఖ విజిలెన్సు అధికారుల దాడులు, పెడుతున్న కేసులు వెంటనే ఉపసంహరించుటకు విద్యుత్ పంపిణీ సంస్థలకు ఉత్తరువులు జారీ చేయుట.	10HP కనెక్టెడ్ లోడ్ లోపల ఉన్న ధోబీ ఘాట్లు, కుటీర పరిశ్రమలు, వడ్రంగి, కంచరి, ఔసలి, శిల్పి, కుమ్మరి, మోచి, అగర్బత్తి ఉత్పత్తి యూనిట్లు, క్రొవ్వొత్తుల ఉత్పత్తి యూనిట్లు, అప్పడాల ఉత్పత్తి సంస్థలు, చెప్పుల తయారీ, సబ్బుల తయారీ, ప్లాస్టర్ ఆఫ్ పారిస్ యూనిట్లు, బొమ్మల తయారీ, పచ్చళ్ళ తయారీ, మామిడి జెల్లీ తయారీ, విస్తరాకుల తయారీ వంటి చిరు పరిశ్రమలే LT -IV కుటీర పరిశ్రమల క్యాటగిరీ లోనికి పరిగణించడం జరుగుతుంది.
3.	కుటీర పరిశ్రమలకు అమలు లో ఉన్న LT కేటగిరీ IV ధరలు రూ.1-80 (ఒక రూపాయి ఎనభై పైసలు) నుండి రూ.4-00 (నాలుగు రూపాయలు) లకు పెంచడం అన్యాయం, అక్రమం. కుటీర పరిశ్రమలకు శరాఘాతముగా మారినది, కావున వెంటనే గతంలో అమలులో ఉన్న రూ.1-80 (ఒక రూపాయి ఎనభై పైసలు) లనే అమలు చేయుటకు ఉత్తర్వులు జారీ చేయుట.	పెరిగిన విద్యుత్ సరఫరా వ్యయానికి అనుగుణంగా ధరలను నిర్దేశించడం జరుగుతుంది. FY 2016-17 రిటైల్ సరఫరా ధరల ఉత్తర్వు ప్రకారం LT-IV కుటీర పరిశ్రమలకు యూనిట్ ఒక్కంటికి ఎనర్జీ ఛార్జీలు రూ.4-00 మరియు స్థిర ఛార్జీలు KW ఒక్కంటికి నెలకు రూ.20-00 నిర్ణయించారు. ఈ విభాగంలో వినియోగదారులు తక్కువ చెల్లింపుదారులుగా గుర్తించి సగటు విద్యుత్ సరఫరా వ్యయం కంటే తక్కువ విద్యుత్ ఛార్జీలు చేయడం జరిగింది మరియు FY 2017-18 సంవత్సరానికి ఎలాంటి పెంపును ప్రతిపాదించలేదు.