

**NORTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED**



**REPLIES TO  
THE OBJECTIONS / SUGGESTIONS RAISED ON ARR & TARIFF  
PROPOSALS FOR RETAIL SUPPLY BUSINESS INCLUDING CROSS  
SUBSIDY SURCHARGE FOR OPEN ACCESS CONSUMERS FOR THE  
FY 2022-23**

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**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by Sri M.Venugopal Rao, Senior Journalist & Convener, Centre for Power Studies, H.No.1-100mp/101 Monarch Prestige, Journalist's Colony, Serilingampally Mandal, Hyderabad -500032(set-1)**

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>The abnormal hike in tariffs proposed for the year 2022-23 by the two TS Discoms, obviously, at the behest or permission of the Government of the Telangana State, for imposing an additional burden of Rs.6831 crore on the consumers of power is unprecedented in terms of the percentage and magnitude of hike in the history of the Telangana State and even of Andhra Pradesh. The proposed hike works out to 18 percent over the estimated revenue under the current tariffs of Rs.36124.51 crore. It is a dubious distinction. In the present circumstances when persistent slump in the economy is compounded by the impact of Covid virus and its variants and measures taken by the Governments in that connection, severely affecting opportunities for work and employment, incomes and living standards of the common people, the proposed tariff hikes have come as the last straw on camel's back. The tariff hikes proposed for industrial and commercial consumers also will have cascading effect, leading to increase in prices of their commodities and services, thereby affecting the interests of the people at large.</p>	<p>TS Discoms agree that COVID-19 has significantly impacted the economy and wellbeing of our state and nation. Having recognized that, TS Discoms had taken various steps to provide relief to its consumers, some of which are mentioned below -</p> <ul style="list-style-type: none"> <li>● Meter reading were suspended with enforcement of national level lockdown in March 2020. Meter readings remained suspended till May and normal meter reading commenced from June 2020</li> <li>● Controlling cost: Project work were reduced to minimum possible only in emergency cases</li> <li>● Provisional Billing to LT consumers for April 2020</li> <li>● Fixed Charges for Industries deferred till 31.05.2020 without any penalty and interest</li> <li>● 1% Rebate for HT Industries for payment within Due date (till 31.05.2020)</li> <li>● Deration of Contracted Load: A consumer can avail deration of the contracted load irrespective of the criteria of completion of minimum period of the agreement as stipulated in GTCS. Existing 3 months' notice period reduced to 30 days.</li> </ul> <p>Having said that, the last tariff hike in the state was approved by the the Hon'ble Commission in FY 2016-17. While, it has been five years now since the last tariff hike, but in the said duration, all the costs incurred by TS Discoms in terms of Power purchase cost, Transmission and Network cost etc. have increased significantly, leading to a constantly increasing revenue gap.</p>

		Hence, TS Discoms believe that the proposed tariff hike is inevitable and justified to improve its financial condition and better customer service and accordingly request the Hon'ble Commission to approve the same after due regulatory proceedings.
2	The Discoms have shown ARR requirement of Rs.53053 crore - Rs.34870 crore for SPDCL and Rs.18183 crore for NPDCL – for the year 2022-23. The revenue at current tariffs is shown as Rs.25422 crore for SPDCL and Rs.10732 crore for NPDCL. They have shown non-tariff income of Rs.33.10 crore for SPDCL and Rs.29.41 for NPDCL. They have shown revenue deficits of Rs.9128.57 crore for SPDCL and Rs.7451.21 crore for NPDCL. Revenue through proposed tariff hike is shown as Rs.5044.27 crore for SPDCL and Rs.1786.63 crore for NPDCL. Subsidy from the Government is shown as Rs.1397.50 crore for SPDCL and Rs.4254.15 crore. Still the Discoms have shown net deficits of Rs.2686.79 crore for SPDCL and Rs.1410.44 crore for NPDCL.	<p>TS Discoms agree with the figures mentioned around the ARR, Revenue @ current tariff, NTI, Gap @ current tariff, additional Revenue @ proposed tariff, Subsidy, Gap @ proposed tariff by the objector for TSSPDCL &amp; TSNPDCL. TS Discoms propose that the remaining revenue gap of Rs. 2686.79 crore for TSSPDCL and Rs.1410.44 crore for TSNPDCL will be met by improving the current operational efficiencies of Discoms. Increase in Cross-subsidizing sales and power purchase cost at optimized rates, will lead to further reduction in the gap.</p> <p>TS Discoms shall also improve its revenue by the following measures</p> <ul style="list-style-type: none"> <li>• Conversion of remaining 20% non-IRDA services to IRDA services, leading to increase in Billing Efficiency</li> <li>• TS Discoms are preparing a scheme for installation of smart meters in a phased manner.</li> </ul>
3	The Discoms have proposed tariff hikes to LT consumers @ Re.0.50 per unit and to HT consumers @ Re.1/- per unit, and increased fixed charges, consumer charges and minimum charges. For some categories like LT agriculture no hike is proposed. On the face of it, it is irrational. Taking paying capacity of the consumers, different rates of tariffs to consumers under different slabs under the same category and to different categories of consumers have been proposed and determined, after providing cross	TS Discoms are committed to provide 24/7 free power to agriculture consumers, in line with the Govt. of Telangana directives. However, TS Discoms are expecting that the sales of agriculture category will decrease with upcoming LIS Loads. TS Discoms receive a subsidy from TS Government to the tune of Rs. 4,415 Crs. with respect to the power supply to agriculture consumers. Thus, no hike is necessary for some categories like LT agriculture.

	<p>subsidy and Government's subsidy also to subsidized categories of consumers over the years. In the proposed tariff hikes for LT and HT categories of consumers, the principles for such standard and justifiable differentiation in tariff fixation are given a go-by by making the lump sum hike applicable uniformly to all categories of consumers under LT and under HT. Obviously, this kind of disproportionate hike leads to higher burden in terms of percentage to majority of the consumers, especially of subsidized categories, that, too, at lower slabs. For example, the hike of tariff for 50 units under LT-1(A) from Rs.1.45 to Rs.1.95 per units works out to 34 per cent. Under LT-1 (B)(i) for a consumption of 100 units the hike in tariff from Rs.3.30 to Rs.3.80 per unit works out to 13 per cent.</p>	<p>TS Discoms have proposed the tariff hikes for different consumer categories and their respective sub-slabs. The objection made in terms of disproportionate hike for some slabs of categories, and hikes for other consumer categories, can be addressed through following points -</p> <ul style="list-style-type: none"> <li>● The tariff for 0-50 unit's domestic category has been constant for last 20 years. Over these years the purchase parity of the consumers has increased multi fold times, similarly the cost per unit for producing one unit of power has also increased. Thus, the proposed hike is justifiable.</li> <li>● For LT Domestic, the proposed tariffs are still significantly lower than the Cost of Service for FY 2022-23.</li> <li>● TS Discoms have carried out the Tariff Comparison analysis of all the major consumer categories across various states. It was found that the tariffs for the lower domestic slabs, HT C&amp;I categories for TS are significantly lower when compared with the other major states like Gujarat, Uttar Pradesh, Haryana, Rajasthan, Punjab, West Bengal etc. Thus, the proposed hike is justifiable.</li> </ul>
4	<p>The Discoms have also failed to explain justification, if any, in imposing or increasing consumer charges and minimum charges, except the implied intention to get additional revenue. For imposing fixed charges for domestic categories and hiking fixed charges for other relevant categories, the Discoms have argued that, based on FY 2022-23 existing tariff, total fixed cost as a percentage of total ARR for 2022-23 is 56%, but the revenue recovered in terms of fixed charges from consumers as a percentage of total revenue is only 13 percent. With the proposed fixed charges for 2022-23, the revenue thereon is expected to increase to 15.7 per cent, in the case of SPDCCL. In the case of NPDCL, it increases from 9 percent to 11.7 percent.</p>	<p>TS Discoms would like to state that the last tariff hike approved by the the Hon'ble commission was in FY 2016-17, While, it has been five years now since the last tariff hike, but in the said duration, all the costs incurred by TS Discoms in terms of Power purchase cost, Transmission and Network cost etc. have increased significantly, leading to a constantly increasing revenue gap. In view of the above, Discoms have proposed the hike in Fixed Charges, Consumer charges &amp; minimum charges. TS Discoms believe that there is a significant gap between the fixed costs incurred (FC paid to Genco, Transmission (STU, PGCIL)</p>

		<p>&amp; SLDC charges, and Distribution Fixed Cost) and the fixed charges recovered from the consumers.</p> <p>Hence, TS Discom have tried to rationalize the tariff structure and reduce the cross subsidy as per National Tariff Policy, 2016 and thus introduced the fixed charges for Domestic category.</p>
5	<p>If imposing or enhancing fixed charges is intended to provide relief to the Discoms incurring financial losses, as argued by them, the Discoms have not explained as to why they have not applied the same logic for LT agriculture. As per the retail supply tariff order for the year 2018-19, the cost of service for LT agriculture was Rs.5.05 per unit for SPDCL and Rs.5.57 per unit for NPDCL. The tariff per unit was Rs. which was subsidized by the Government. Now, for the year 2022-23, the Discoms have shown cost of service for LT agriculture as Rs.9.20 per unit for SPDCL and Rs.8.96 per unit for NPDCL, but tariff is not proposed to be revised. Why? If tariff for LT agriculture is revised as per cost of service after adjusting cross subsidy, the Government has to provide substantial additional subsidy. In the subsidy of the Government shown in the subject filings, what is the estimated requirement of subsidy for LT agriculture? The Hon'ble Commission has to work out full cost tariff as per cost of service for LT agriculture, as is the case with other categories of consumers, minus cross subsidy decided by it. Since the Government is implementing the policy of free supply of power to agriculture for 24 hours a day, it has to provide the subsidy as per cost of service minus cross subsidy determined by the Commission. We request the Hon'ble Commission to determine full cost tariff for LT agriculture accordingly.</p>	<p>TS Discoms are committed to provide 24/7 free power to agriculture consumers, in line with the Govt. of Telangana directives. However, TS Discoms are expecting that the sales of agriculture category will decrease with upcoming LIS Loads. TS Discoms receive a subsidy from TS Government to the tune of Rs. 4415 Crs. with respect to the power supply to agriculture consumers. Thus, no hike is necessary for some categories like LT agriculture.</p> <p>As per the current ambit of the TSERC regulations in place, the Hon'ble Commission computes the Full cost recovery tariff schedule and Retails Supply tariff schedule for all consumer categories after considering the subsidy commitment by the GoTS and cross subsidies across various consumer categories.</p> <p>TS Discoms shall abide by the directions given by the Hon'ble Commission, and the subsidy commitments by the Govt. of Telangana.</p>

6	<p>The State Government provided yearly subsidy (In Rs. crores) as under:</p> <table border="1" data-bbox="193 297 926 516"> <thead> <tr> <th>Discom</th> <th>2018-19</th> <th>2019-20</th> <th>2020-21</th> <th>2021-22</th> <th>2022-23</th> </tr> </thead> <tbody> <tr> <td>SPDCL</td> <td>1149.18</td> <td>1172.56</td> <td>1397.50</td> <td>1397.50</td> <td>1397.50</td> </tr> <tr> <td>NPDCL</td> <td>3500.57</td> <td>3569.00</td> <td>4254.15</td> <td>4254.15</td> <td>4254.15</td> </tr> <tr> <td><b>Total</b></td> <td><b>4650.55</b></td> <td><b>4741.56</b></td> <td><b>5651.65</b></td> <td><b>5651.65</b></td> <td><b>5651.65</b></td> </tr> </tbody> </table> <p>For the year 2018-19, against the subsidy requirement of Rs.5940.47 crore, the Government informed the Commission that an amount of Rs.4984.30 crore was provisioned in the budget for agriculture and allied subsidy and that the balance amount “will be examined at appropriate time. “Neither the “appropriate” time has come, nor has the KCR Government “examined” the issue of providing the balance amount towards subsidy, going by the information furnished by the Discoms. In the tariff order for 2018-19, the Hon’ble Commission maintained that “in case of non-commitment of GoTS for the release of the said differential amount by 30.09.2018, the DISCOMs shall file Petition(s) before the Commission seeking appropriate relief. The Commission shall take an appropriate view based on the scrutiny of the said Petition(s) of the DISCOMs” (page 110). Obviously, nothing has happened so far on the issue. While revenue requirement of the Discoms and increase in supply of power to various categories of consumers have been increasing over the years, for three consecutive years from 2020-21, the Government has not increased the subsidy amount, at least, proportionately. While the Government of Andhra Pradesh is providing a hefty subsidy, exceeding Rs.10,000 crore for the year 2021-22, the rulers in the “rich State” of Telangana continue to be parsimonious. It is obvious that the intention of</p>	Discom	2018-19	2019-20	2020-21	2021-22	2022-23	SPDCL	1149.18	1172.56	1397.50	1397.50	1397.50	NPDCL	3500.57	3569.00	4254.15	4254.15	4254.15	<b>Total</b>	<b>4650.55</b>	<b>4741.56</b>	<b>5651.65</b>	<b>5651.65</b>	<b>5651.65</b>	<p>TS Discoms would like to state that it is unfair on the part of the objector to question the intentions of the GoTS.</p> <p>Govt. of Telangana has been adopting the following steps to improve Discom financial position, in addition to the subsidy disbursements for LT Agriculture and LT Domestic consumers -</p> <ul style="list-style-type: none"> <li>● GoTS has started releasing LIS CC charges by providing budgetary support from 2021. This will improve collection efficiency and eventually reduce AT&amp;C losses</li> <li>● GoTS has instructed Panchayat Raj and Municipal administration to pay CC charges as per vide Lr. No. 768, dt. 14.08.2020.</li> <li>● GoTS is releasing the subsidy regulary in the same month.</li> <li>● GoTS has already infused the equity of INR 9,161 Cr., in addition to the subsidy, which is improving the cash flows of Discoms</li> <li>● Telangana is having one of the lowest tariffs, compared to other states in India</li> <li>● Further benefits to SC &amp; ST consumers for domestic use, Haircutting salons, Dobhighats, Laundry shops, powerlooms, poultry farms and spinning mills</li> </ul> <p>TS Discoms shall abide by the directions given by the Hon’ble Commission, and the subsidy commitments by the Govt. of Telangana.</p>
Discom	2018-19	2019-20	2020-21	2021-22	2022-23																					
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	<p>the KCR Government is to impose more burdens on the consumers in the form of increasing tariffs by not increasing the subsidy amount.</p>																					
7	<p>The Government of India, GoTS and the Discoms entered into a tripartite MoU on 4.1.2017 (UDAY scheme) under which the GoTS has to take over 75 percent of the outstanding debt of the Discoms as on 30.9.2015 by the end of 2016-17. The Commission did not find merit in the submissions of the Discoms that "savings" due to UDAY scheme might be considered at the end of the control period, but adjusted a sum of Rs.1116.42 crore under UDAY for reducing the ARR of the Discoms for the year 2018-19 (page 86 of the tariff order). What is the latest position relating to taking over of the outstanding debt of the Discoms by the GoTS under UDAY?</p>	<p><b><u>UDAY status of Telangana Discoms (Debt Takeover)</u></b></p> <ul style="list-style-type: none"> <li>• Total debt to be taken over (75% of the total debt as on 30.09.2015 i.e. Rs.11,897 Crs.) = Rs. 8,923 Cr.</li> <li>• Transfer to TS Discoms in the form of equity = Rs. 7,723 Crs.</li> <li>• Balance to be taken over by the State Government as per UDAY MoU = Rs. 1,200 Crs.</li> </ul> <p>GoTS has already infused the equity of INR 9,161 Cr., in addition to the subsidy, which is improving the cash flows of Discoms.</p>																				
8	<p>The following yearly revenue deficits (in Rs. crore) are shown by the Discoms in the subject filings:</p> <table border="1" data-bbox="193 964 945 1175"> <thead> <tr> <th>Discom</th> <th>2018-19</th> <th>2019-20</th> <th>2020-21</th> <th>2021-22</th> </tr> </thead> <tbody> <tr> <td>SPDCL</td> <td>6354.87</td> <td>5604.01</td> <td>6296.97</td> <td>7007.86</td> </tr> <tr> <td>NPDCL</td> <td>3877.87</td> <td>1712.28</td> <td>2369.79</td> <td>3615.98</td> </tr> <tr> <td><b>Total</b></td> <td><b>10232.74</b></td> <td><b>7317.29</b></td> <td><b>8666.76</b></td> <td><b>10624.84</b></td> </tr> </tbody> </table> <p>For these four years the total accumulated revenue deficit of the two Discoms works out to Rs.36841.63 crore. Even after taking into account impact of proposed tariff hikes and subsidy from the Govt., for the year 2022-23, too, the Discoms have shown a substantial deficit – Rs.2686.79 crore by SPDCL and Rs.1410.44 crore by NPDCL. But in the main text of</p>	Discom	2018-19	2019-20	2020-21	2021-22	SPDCL	6354.87	5604.01	6296.97	7007.86	NPDCL	3877.87	1712.28	2369.79	3615.98	<b>Total</b>	<b>10232.74</b>	<b>7317.29</b>	<b>8666.76</b>	<b>10624.84</b>	<p>TS Discoms would like to state that they have been filing the ARR petitions, on an annual basis, before the Hon'ble Commission (TSERC) until FY 2018-19. From FY 2019-20 onwards, the Discoms have not filed the ARR petitions before the Hon'ble TSERC, due to the following reasons –</p> <ul style="list-style-type: none"> <li>• Enforcement of Model Code of Conduct in the State of Telangana in view of elections for Telangana Assembly.</li> <li>• Hon'ble TSERC was not operational from 9th Jan 2019, after the Chairman of Hon'ble TSERC demitted office after attaining the age of 65 years.</li> <li>• Enforcement of Model Code of Conduct in the State of Telangana from 10.03.2019 till 23.05.2019 (Lok Sabha election).</li> </ul>
Discom	2018-19	2019-20	2020-21	2021-22																		
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<p>their filings, the Discoms have not shown such additional revenue gap for 2022-23. If the additional revenue gap shown is correct, what do the Discoms propose to fill it? Moreover, the Discoms have to claim true-up for their retail supply business for the years from 2015-16 to 2020-21 and true-up for their distribution business for the first three control periods also. The accumulated true-up claims of the Discoms are turning out to be astronomical and unbearable to the consumers at large. Needless to say, such accumulated burdens are getting intensified by increasing the need for more working capital for the Discoms and the avoidable interest thereon. If all these accumulated burdens are allowed by TSERC even to the extent permissible as per applicable regulations and imposed on the consumers, what would be the reaction of the people of the State is anybody's guess. For all these burdens, policies, decisions and actions of the Central and State Governments are responsible. The power utilities of the Government have their share for this precarious situation in terms of deficiencies and inefficiencies in their performance. But, it is the reckless failure of the KCR Government that is squarely responsible for accumulation of the burdens to the abnormal level. When such a financial crisis has been engulfing its power utilities over the years, what has the KCR Government been doing to avert the crisis and take remedial measures? What corrective steps and prudent alternative measures do the Discoms propose? Did they make any proposals to the GoTS and GoI in order to improve their position and strengthen them and protect larger consumer interest?</p>	<ul style="list-style-type: none"> <li>● Pending information from ICAD department on Lift Irrigation (LI) schemes.</li> <li>● Issuance of model code of conduct for the Municipal elections from 23.12.2019 to 25.01.2020</li> <li>● Further extension in view of preparation of tariff proposals in accordance to the MoP recommendations on Tariff Rationalisation process.</li> <li>● Due to imposition of Lockdown in the State by GoTS due to spread of pandemic COVID-19, which impacted the consumption of electricity by various sectors, the licensees intended to file ARR duly including the impact of lockdown due to COVID-19 pandemic.</li> <li>● Enforcement of Model Code of Conduct from 17th Nov 2020 to 4th Dec 2020 in view of GHMC elections.</li> <li>● Certain unavoidable circumstances viz; uncertainty in commissioning of the LI pumps and delay in receipt of information of power availability and cost there on from Central Generating Stations, which have significant impact on the demand projections and overall ARR respectively.</li> </ul> <p>However, ARR for 2019-20, 2020-21, 2021-22 was submitted before TSERC on March 31, 2021, which was not admitted by the Hon'ble Commission due to non-submission of tariff proposals by the TS Discoms.</p> <p>TS Discoms shall also improve its revenue by the following measures</p> <ul style="list-style-type: none"> <li>● Conversion of remaining 20% non-IRDA services to IRDA services, leading to increase in Billing Efficiency</li> </ul> <p>TS Discoms are preparing a scheme for installation of smart meters in a phased manner</p>
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9	<p>After failing to file in time and in the form required under the applicable regulations their annual revenue requirement (ARR) and tariff revision proposals for the years 2019-20, 2020-21 and 2021-22 before the Hon'ble Commission, the two Distribution Companies have filed their ARR and tariff revision proposals for the year 2022-23. Only after the Hon'ble Commission rightly insisted on the Discoms to file their tariff revision proposals, they did so. Another reason is that, filing of ARR and tariff revision proposals by the Discoms has been considered one of the factors for ratings given in the reports of the Gol and such non-submission affects credit ratings of the power utilities of the State Government for getting loans.</p>	<p>TS Discoms have already submitted the Distribution true up claims for 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> control period along with the APR filing for FY2019-20. TS Discoms have also filed the APR for 2020-21 on 31 December 2021.</p> <p>TS Discoms have already finalized the true up claim for RSB for 2016-17 to 2018-19 and currently drafting the same for 2019-20 &amp; 2020-21. TS Discoms would be submitting all their RSB true up claims shortly to the Hon'ble Commission.</p> <p>TS Discoms would like to state that it is unfair on the part of the objector to question the intentions of the GoTS.</p> <p>Govt. of Telangana has been adopting the following steps to improve Discom financial position, in addition to the subsidy disbursements for LT Agriculture and LT Domestic consumers -</p> <ul style="list-style-type: none"> <li>● GoTS has started releasing LIS CC charges by providing budgetary support from 2021. This will improve collection efficiency and eventually reduce AT&amp;C losses</li> <li>● GoTS has instructed Panchayat Raj and Municipal administration to pay CC charges as per vide Lr. No. 768, dt. 14.08.2020.</li> <li>● GoTS is releasing the subsidy regulary in the same month.</li> <li>● GoTS has already infused the equity of INR 9,161 Cr., in addition to the subsidy, which is improving the cash flows of Discoms</li> <li>● Telangana is having one of the lowest tariffs, compared to other states in India</li> </ul> <p>Further benefits to SC &amp; ST consumers for domestic use, Haircutting salons, Dobhighats, Laundry shops, powerlooms, poultry farms and spinning mills.</p>
10	<p>The TRS Government in Telangana violated the Electricity Act, 2003 by not initiating the process in due course for appointment of members and Chairman of the TSERC in time. As per Section 85(2) of the Electricity Act,</p>	<p>Regarding the delay in ARR proposals, TS Discoms would like to state that they have been filing the ARR petitions, on an annual basis, before the Hon'ble Commission (TSERC) until FY 2018-19.</p>

	<p>2003, "The State Government shall, within one month from the date of occurrence of any vacancy by reason of death, resignation or removal of the Chairperson or Member and six months before the superannuation or end of tenure of the Chairperson or Member, make a reference to the Selection Committee for filling up of the vacancy." Section 85(3) says: "The Selection Committee shall finalise the selection of the Chairperson and Members within three months from the date on which the reference is made to it." As a result, TSERC acted as a one-man Commission for nearly ten months up to 9<sup>th</sup> January, 2019 and became defunct for nearly ten months up to 29<sup>th</sup> October, 2019. Even after the present Chairman and members were appointed, GoTS continued to fail to get ARR and tariff proposals filed before the Commission in time and in the form required.</p>	<p>From FY 2019-20 onwards, the Discoms have not filed the ARR petitions before the Hon'ble TSERC, due to the reasons submitted in its abovementioned response to queries 8 and 9.</p>
11	<p>Due to intransigence of the Government of Telangana, the Discoms could not file their ARR and tariff revision proposals for the three consecutive financial years from 2019-20 to 2021-22. The Discoms have been forced to violate law by collecting tariffs as per the tariffs determined in the retail supply tariff order for the year 2018-19 for a part of the subsequent year till the present Commission gave its orders allowing them to collect tariffs for that period with retrospective effect and for subsequent years. While revenue requirements and revenue gaps of the Discoms kept on increasing, rates of tariffs collected remained the same and yearly subsidies have been provided by the Government, with marginal increase only. The end result is accumulation of the abnormal revenue gap and the resultant burdens. There has been no sense of accountability, responsibility and transparency on the part of the Government of Telangana and its power utilities in meeting the legal and regulatory requirements relating to the Hon'ble Commission.</p>	<p>TS Discoms had taken due permission from the Hon'ble Commission, for the continuation of tariffs as per FY 2018-19 Tariff Order, for FY 2019-20, FY 2020-21 and 2021-22, as mentioned in the following Orders -</p> <ul style="list-style-type: none"> <li>● <i>TSERC letter dated 28.03.2019 (letter No.: TSERC/ Secy/ F: L-63/ D.No.8119), had concurred with the GoTS letter dated 26.03.2019 which allowed the continuation of existing tariffs till the tariff determination by TSERC.</i></li> <li>● <i>TSERC order dated 20.03.2020: I.A.No.8 of 2020 in O.P.Nos. 21 &amp; 22 of 2017, has allowed the continuation of the retail supply tariffs as per order dated 27.03.2018, with such tariffs shall be made applicable and levied from 01.04.2020</i></li> <li>● <i>TSERC order dated 27.03.2021: I.A.No.4 of 2021 in O.P.Nos. 21 &amp; 22 of 2017, has allowed the continuation of the retail supply tariffs as per order dated 27.03.2018, with such tariffs shall be made applicable and levied from 01.04.2021</i></li> </ul> <p>Regarding the delay in ARR proposals, TS Discoms would like to state that they have been filing the ARR petitions, on an annual</p>

		<p>basis, before the Hon'ble Commission (TSERC) until FY 2018-19. From FY 2019-20 onwards, the Discoms have not filed the ARR petitions before the Hon'ble TSERC, due to the reasons submitted in its abovementioned response to queries 8 and 9.</p>
12	<p>This is not for the first time that the TS Discoms are flouting directions and regulations of of the Hon'ble Commission. In my submissions dated 21.6.2017 on ARR and true up claims of the TS Discoms, I pointed out, inter alia, that "The Discoms have not submitted details of their projected revenue gap for the year 2017-18 even in their replies to our submissions in which we have specifically asked for the same. They have not also provided information and data relating to true up claims for the first and second control periods and for the last two financial years. The Hon'ble Commission has also not exercised its legitimate authority to direct the Discoms to submit the information relating to revenue requirement, revenue at current tariffs, non-tariff income, likely subsidy to be provided by the Government and the remaining revenue gap and how they propose to bridge the remaining revenue gap for 2017-18. This information is very much necessary for the Hon'ble Commission to determine permissible revenue requirement and revenue gap and ask the State Government for providing subsidy, if tariffs should not be hiked as proposed by the Discoms. Similarly, this information is very much necessary for the interested public also to make submissions. Since the inception of APERC in the undivided A.P. and formation of TSERC after bifurcation of the State, there has been no occasion when Discoms have submitted ARR and tariff proposals in this manner, without giving information relating to their projected revenue gap, and the Commission taking up the same for public hearing in this manner.</p> <p>To meet the political expediency of the party-in-power in the State, at the behest of the Government, the Discoms have concealed this vital</p>	<p>TS Discoms during the ARR filing for 2022-23 have submitted all relevant information in their ARR write-ups and RSF formats, before the Hon'ble Commission on 30.11.2021. the TS Discoms have also submitted their tariff proposals to the TSERC on 27.12.2021, along with the details of projected revenue and gap at proposed tariff. This information can also be found in the schedule I submitted by Discoms as directed by TSERC.</p> <p>TS Discoms understand that the information related to Revenue at current and proposed tariff, Revenue Gap and Subsidy is crucial for TSERC, public and thus have provided all the required information in the prescribed formats.</p> <p>TS Discoms shall also improve its revenue by the following measures –</p> <ul style="list-style-type: none"> <li>• Conversion of remaining 20% non-IRDA services to IRDA services, leading to increase in Billing Efficiency</li> <li>• TS Discoms are preparing a scheme for installation of smart meters in a phased manner.</li> </ul> <p>TS Discoms have already submitted the Distribution true up claims for 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> control period along with the APR filing for FY2019-20. TS Discoms have also filed the APR for 2020-21 on 31 December 2021.</p> <p>TS Discoms have already finalized the true up claim for RSB for 2016-17 to 2018-19 and currently drafting the same for 2019-20</p>

<p>information with a view to hoodwinking the people that there are no burdens of tariff hike, even while continuing to keep revenue gap and huge amounts to be claimed under true up accumulated and concealed till the next general elections are held. Barring that, there is no purpose in concealing this vital information and making a mockery of the regulatory process and public hearings. The Discoms could not give any explanation as to why they are concealing this information. Being entities subordinate to the powers-that-be in the Government, the Discoms are compelled to adopt this questionable approach much to the detriment of their interests and of their consumers of power at the behest of the Government. One can understand their predicament. This concealment is a part and parcel of the political necromancy of the Government to subserve pre-election political expediency of the party-in-power. For the year 2018-19 also, the Government in all likelihood would force the Discoms to adopt similar questionable approach of concealing such vital information to hoodwink the people during the pre-election period. The proposal of the Discoms at the behest of the Government not to hike tariffs to bridge their revenue gap is really not a no-hike, but postponement of tariff hikes for a future period. The Discoms are naturally expected to try to collect what is due to them in time; they do not prefer postponement of the same. Being an independent and quasi-judicial body, why is the Hon'ble Commission reluctant to exercise its legitimate authority to direct the Discoms to submit and make public the said vital information which is very much necessary for its regulatory process and public hearings? What is the purpose in allowing the Discoms to conceal such information? It is the responsibility of the Hon'ble Commission to ensure that the principles of transparency and accountability are observed by the Discoms." There was no convincing response from the Commission then.</p>	<p>&amp;2020-21. TS Discoms would be submitting all their RSB true up claims shortly to the Hon'ble Commission. TS Discoms shall abide by the instructions provided by the Government of Telangana and TSERC.</p>
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	<p>In the retail supply tariff order for the year 2017-18, the Hon'ble Commission pointed out that "The Licensees are expected to file the ARR and Tariff proposals for retail supply business for the ensuing year by the end of November of current year as per the Act and regulations. The Licensees have requested multiple extensions of time for filing petitions. Owing to the reasons laid down for the delays in their ARR filings, the Commission while expressing displeasure in this regard, directs the DISCOMs to adhere to the timelines as laid down in the Act, regulations and UDAY" (page 11). The Commission further noted that "In accordance with APERC Regulation No.1 of 2014 adopted by the Commission, the DISCOMs are required to file true up of retail supply business giving details of the variation in power purchase cost of previous year along with the ARR for the next year. The DISCOMs have not filed true up proposals in accordance with the APERC Regulation No.1 of 2014" (page 12).</p>	
13	<p>In our submissions dated 17.1.2018 on ARR and tariff proposals of the TS Discoms for the year 2018-19, we pointed out, among others, that "the proposal of the Discoms not to hike tariffs for the year 2018-19 and their failure to explain how they propose to bridge the projected revenue gaps for the same year and for various other factors not taken into consideration by them for the year 2018-19, it can be asserted that they will come up with true-up claims for 2016-17, 2017-18 and the year 2018-19 also later in the post-election period. Therefore, the proposal of the Discoms not to hike tariffs for the year 2018-19 is a futile attempt to hoodwink the people of the State that there are no additional burdens of tariff hikes in the pre-election period to meet political expediency of the party-in-power. In all probability, the Discoms may be forced by the powers-that-be to postpone submission of true up claims for the year 2016-17 and the current financial year to post-poll period. It is for the Hon'ble Commission to exercise its legitimate</p>	<p>The submitted query no. 13 pertains to the ARR proceedings during FY 2018-19. TS Discoms have timely submitted the ARR filings for FY 2018-19 before the Hon'ble Commission.</p> <p>TS Discoms shall also improve its revenue by the following measures –</p> <ul style="list-style-type: none"> <li>• Conversion of remaining 20% non-IRDA services to IRDA services, leading to increase in Billing Efficiency</li> </ul> <p>TS Discoms are preparing a scheme for installation of smart meters in a phased manner</p> <p>TS Discoms have already finalized the true up claim for RSB for 2016-17 to 2018-19 and currently drafting the same for 2019-20 &amp; 2020-21. TS Discoms would be submitting all their RSB true up claims shortly to the Hon'ble Commission.</p>

	<p>authority to direct the Discoms to submit the same in time and issue orders after holding public hearings promptly.”</p> <p>Further we submitted that “Since the Discoms have not made it clear as to how they would propose to bridge the projected revenue gaps for the year 2018-19, we request the Hon’ble Commission to make it clear that no true up claim would be permitted later for the revenue gap, if any, that is going to be determined by it after taking into account the subsidy amount the GoTS is willing to provide. We also request the Hon’ble Commission to make it clear to the Discoms that the remaining revenue gap, if any, to be determined for the year 2018-19 will not be treated as regulatory asset. It is to be noted here that regulatory asset can be considered only when hefty tariff hike is required and only a part of it is permitted by the Commission to avoid tariff shock to the consumers and that such revenue gap treated as regulatory asset can be permitted to be collected from the consumers in later years. Here, in the subject proposals of the Discoms, as they have not even proposed any tariff hike for the year 2018-19, the question of considering regulatory asset does not arise.” In the tariff order for 2018-19, the Hon’ble Commission pointed out that, “Upon scrutiny of the ARR filings and tariff proposals submitted by the licensees, the Commission identified certain data gaps and directed the licensees to furnish additional information. As directed by the Commission, the licensees furnished additional information and placed the same on their respective websites” (page 3).</p>	<p>TS Discoms shall abide by the instructions provided by the Hon’ble Commission.</p>
14	<p>Whether the Discoms sought extension of time for filing their ARR and tariff proposals for the years 2019-20, 2020-21, 2021-22 and the reasons given, if any, for the same, and notices or directions given by the Hon’ble Commission to the Discoms in this regard are not in public domain. The Discoms continued to flout law and regulations and directions of the</p>	<p>Regarding the delay in ARR proposals, TS Discoms would like to state that they have been filing the ARR petitions, on an annual basis, before the Hon’ble Commission (TSERC) until FY 2018-19. From FY 2019-20 onwards, the TS Discoms have not filed the ARR</p>

	<p>Commission in this regard. Why have the Discoms failed to submit their ARR and tariff revision proposals in time and as per applicable regulations of the Hon'ble Commission for all the three years?</p>	<p>petitions before the Hon'ble TSERC, due to the reasons submitted in its abovementioned response to queries 8 and 9. TS Discoms had taken due permission from the Hon'ble Commission, for the continuation of tariffs as per FY 2018-19 Tariff Order, for FY 2019-20, FY 2020-21 and 2021-22, as elaborated in its response to query 11.</p> <p>The abovementioned reasons were submitted before the Hon'ble Commission on March 31, 2021 during its ARR filing for 2019-20, 2020-21, 2021-22, on March 31, 2021, which was not admitted by the Hon'ble Commission due to delay in the submission of tariff proposals.</p>
15	<p>Secretary of TSERC, through the circular Lr. No. TSERC/Secy/F-No.ARR2017-18/5/D.No.879/17,dated 17.02.2107, intimated the TS Discoms that, "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 of the suo moto proceedings for determination of the retail supply tariff for FY 2017-18." However, experience has confirmed that the Hon'ble Commission has not taken any initiative suo motu to initiate its regulatory process for determination of ARR and tariffs for the financial years from 2019-20 to 2021-22 as per law and its own decision, in view of non-submission of ARR and tariff proposals by the Discoms. There is no evidence in public domain that the Hon'ble Commission made it clear to the Discoms that, unless they file their ARR and tariff revision proposals in time, it would not permit them to collect tariffs from consumers based on old tariffs of 2018-19 and that their true-up claims will not be entertained for</p>	<p>This query falls under the purview of the Hon'ble Commission. TS Discoms had taken due permission from the Hon'ble Commission, for the continuation of tariffs as per FY 2018-19 Tariff Order, for FY 2019-20, FY 2020-21 and 2021-22, as elaborated in its response to query 11.</p>

	<p>the years ARR and tariff proposals have not been filed as per applicable regulations.</p>	
<p>16</p>	<p><i>In its order dated 27.3.2021, the Hon'ble Commission held that "the retail supply tariffs, cross subsidy surcharge and additional surcharge as applicable on 31.03.2019 as per order dated 27.03.2018 are continued and made applicable and can be levied from 01.04.2021 pending disposal of this application finally subject to the communication of the State Government conveying the commitment of subsidy as stated in paragraph 5 above. The tariff determined in respect of electric vehicle charging stations/battery swap as also in respect of concessional tariff to HMMWSSB shall also stand continue from 01.04.2021 till the TSDISCOMs file their regular proposals. The TSDISCOMs are directed to file the regular petition for determination of fresh retail supply tariffs, cross subsidy surcharge and additional surcharge for FY 2021-22 immediately."</i></p> <p>The Hon'ble Commission has issued a notice to the TS Discoms and held a hearing on 20.12.2021 on maintainability of their ARR proposals in the deficient form submitted by them without giving their proposals for bridging the projected revenue gap for the years 2019-20, 2020-21 and 2021-22 and tariff revision proposals. The Hon'ble Commission has rightly decided in its order dated 22.12.2021 to "decline from entertaining the ARR Petitions mainly for the reason that the time period for which they were sought was already lapsed. Hence, they are refused."</p> <p>Under Section 64 (4) (b) of EA, 2003, the appropriate Commission shall, inter alia, "reject the (tariff) application for reasons to be recorded in writing if such application is not in accordance with the provisions of this Act or the rules and regulations made thereunder or the provisions of any other law for the time being in force:" In view of the decision of the Hon'ble</p>	<p>Regarding the delay in ARR proposals, TS Discoms would like to state that they have been filing the ARR petitions, on an annual basis, before the Hon'ble Commission (TSERC) until FY 2018-19. From FY 2019-20 onwards, the TS Discoms have not filed the ARR petitions before the Hon'ble TSERC, due to the reasons submitted in its abovementioned response to queries 8 and 9. TS Discoms had taken due permission from the Hon'ble Commission, for the continuation of tariffs as per FY 2018-19 Tariff Order, for FY 2019-20, FY 2020-21 and 2021-22, as elaborated in its response to query 11.</p> <p>The abovementioned reasons were submitted before the Hon'ble Commission on March 31, 2021 during its ARR filing for 2019-20, 2020-21, 2021-22, on March 31, 2021, which was not admitted by the Hon'ble Commission due to delay in the submission of tariff proposals. TS Discoms have already finalized the true up claim for RSB for 2016-17 to 2018-19 and currently drafting the same for 2019-20 &amp; 2020-21. TS Discoms would be submitting all their RSB true up claims shortly to the Hon'ble Commission.</p> <p>TS Discoms shall abide by the further instructions provided by the Hon'ble Commission.</p> <p>TS Discoms shall also improve its revenue by the following measures –</p> <ul style="list-style-type: none"> <li>• Conversion of remaining 20% non-IRDA services to IRDA services, leading to increase in Billing Efficiency</li> </ul>



	<p>Commission not to entertain the ARR petitions for the said three years “mainly for the reason that the time period for which they were sought was already lapsed,” a pertinent question would arise - whether the Hon’ble Commission would give further time to the Discoms to file their ARR and tariff applications for the said three years, if the Discoms seek it again.</p> <p>Since the financial years 2019-20 and 2020-21 had already run out and the first nine months of 2021-22 also lapsed, filing of ARR and tariff proposals for the three years by the Discoms would become superfluous. Retail supply tariff orders the Hon’ble Commission issues should come into effect from the 1<sup>st</sup> April of the financial year for which such orders are issued, not with retrospective effect. As such, non-submission of ARR and tariff proposals by the Discoms for the said three financial years in time and as required under applicable regulations is, and should be treated as, a closed chapter.</p>	<p>TS Discoms are preparing a scheme for installation of smart meters in a phased manner.</p>
17	<p>With tariffs determined by TSERC for the year 2018-19 continuing for the subsequent three years, with whatever yearly subsidy being provided by the Government, and with increasing expenditure and widening revenue gap, the accumulated revenue gap of the Discoms has been turned out to be abnormal . The TS Discoms have been in financial doldrums. Under normal circumstances, the Discoms would or should have claimed variations in their annual revenue requirement from what was determined by the Hon’ble Commission in the annual retail supply orders as per the applicable regulations and directions of the Commission. First, they should claim provisional true-up of such variations in ARR for a financial year in the ARR and tariff proposals of the next financial year and later final true-up after accounts for the financial year concerned were audited. Now the question that arises is this: Can or will the Hon’ble Commission entertain true-up claims of the Discoms for the said three years for which they did not file ARR and tariff proposals in time and the Commission did not entertain them and</p>	<p><b>Response to query 17 (a) -</b></p> <p>Regarding the delay in ARR proposals, TS Discoms would like to state that they have been filing the ARR petitions, on an annual basis, before the Hon’ble Commission (TSERC) until FY 2018-19. From FY 2019-20 onwards, the TS Discoms have not filed the ARR petitions before the Hon’ble TSERC, due to the reasons submitted in its abovementioned response to queries 8 and 9. TS Discoms had taken due permission from the Hon’ble Commission, for the continuation of tariffs as per FY 2018-19 Tariff Order, for FY 2019-20, FY 2020-21 and 2021-22, as elaborated in its response to query 11. The abovementioned reasons were submitted before the Hon’ble Commission on March 31, 2021 during its ARR filing for 2019-20, 2020-21, 2021-22, on March 31, 2021, which was not admitted by the Hon’ble Commission due to delay in the submission of tariff proposals.</p>

<p>issue annual retail supply tariff orders? If the Discoms file their true-up claims for the said three years and if the Hon'ble Commission entertains them and issues its orders thereon, it would become incongruous for the following reasons, among others:</p> <ol style="list-style-type: none"> <li>a) It will set a bad precedent. It would be tantamount to permitting the Discoms not to file their ARR and tariff proposals, but simply seek continuance of the existing tariffs for the next year and later submit true-up claims as and when they like for the year/s for which they have not submitted ARR and tariff proposals. It will make a mockery of the regulatory process.</li> <li>b) True-up claims do not provide for cross-subsidy and Government's subsidy to subsidized categories of non-agricultural consumers under the present arrangement. When Government is expected to bear the additional expenditure incurred by the Discoms for supplying power to agriculture free of cost as per its policy, the same principle should apply to other subsidized consumers in non-agricultural categories also. Free supply of power to agriculture means hundred percent subsidy, whereas supply of power to other subsidized consumers is part-subsidized or partly free; it is a difference in degree between these two arrangements.</li> <li>c) Subsidised consumers under non-agricultural categories are being deprived of the benefit of subsidy and cross-subsidy under true-up claims of the Discoms. On the other hand, amounts claimed under true-up by the Discoms are being imposed on per-kwh basis equally on all non-agricultural categories of consumers. In other words, subsidized consumers under non-agricultural categories are being treated on par with subsidizing consumers, thereby depriving the former partly or fully of the benefit of subsidy and cross-subsidy they are getting under retail supply tariffs determined by the Hon'ble</li> </ol>	<p>TS Discoms have already finalized the true up claim for RSB for 2016-17 to 2018-19 and currently drafting the same for 2019-20 &amp; 2020-21. TS Discoms would be submitting all their RSB true up claims shortly to the Hon'ble Commission.</p> <p>TS Discoms shall abide by the further instructions provided by the Hon'ble Commission.</p> <p><b><u>Response to query 17 (b) &amp; (c) -</u></b></p> <p>TS Discoms shall abide by the instructions provided by the Hon'be Commission</p> <p>TS Discoms would like to state that as per National tariff policy 2016, cross subsidy has to be restricted to a limit of +/- 20%. TS Discoms are trying their level best to reduce their cross subsidy.</p> <p><b><u>Response to query 17 (d), (e), (f), (g) &amp; (h) -</u></b></p> <p>TS Discoms have already submitted the Distribution true up claims for 1st, 2nd and 3rd control period along with the APR filing for FY2019-20. TS Discoms have also filed the APR for 2020-21 on 31 December 2021.</p> <p>TS Discoms have already finalized the true up claim for RSB for 2015-16 to 2018-19 and currently drafting the same for 2019-20 &amp; 2020-21. TS Discoms would be submitting all their RSB true up claims shortly to the Hon'ble Commission</p> <p>TS Discoms view that this current situation where the burden of true-up due to power consumed by the consumers in preceding</p>
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<p>Commission in its annual retail supply tariff orders. Irrespective of the period of true-up claims, these anomalies continue under the present arrangement.</p> <p>d) Whenever delayed claims under true-up are made by the Discoms, several valid objections have been raised on various grounds from the side of non-agricultural consumers on allowing such claims that have been affecting their financial interests and leading to conflicts on who should bear the burden of true-up claims – whether the consumers who consumed power during the period of true-up claims or other consumers presently consuming power in the same dwelling/establishment under the same service connection. Similarly, objections are being raised as to why a consumer who has taken a service connection newly should be subjected to paying true-up charges proportionately on the basis of his monthly consumption during the period of permitted recovery of the same for power consumed by other consumers during the past period for which true-up claims are permitted.</p> <p>e) Under the present system of true-up, allowing collection of the permitted amounts on per-kwh basis equally from all non-agricultural consumers is leading to giving up of the principles or parameters being applied by the Hon'ble Commission for working out cost of service to each category of consumers for the purpose of determining retail supply tariffs.</p> <p>f) By allowing the Discoms to include their claims for recovering additional revenue deficit exceeding the level of expenditure/revenue permitted by the Hon'ble Commission for the present financial year in their claims of annual revenue requirement and tariff revisions they submit for the next financial year, various anomalies, as pointed out above, can be avoided and equity ensured.</p>	<p>year (or at a different dwelling), being charged on the consumers in succeeding years, would always arise.</p> <p>This is a continuous process and in any year for any consumer a small part of his payment could consist of the true up claims of the preceding year.</p> <p>TS Discoms shall abide by the instructions provided by the Hon'be Commission.</p> <p><b>Response to query 17 (i), (j), (k), (l) &amp; (m) -</b></p> <p>As per the current ambit of the TSERC regulations in place the Hon'ble commission computes the Full cost recovery tariff schedule and Retails Supply tariff schedule for all consumer categories after considering the subsidy commitment by the GoTS and cross subsidies across various consumer categories.</p> <p>TS Discoms shall abide by the instructions provided by the Hon'ble Commission.</p> <p>TS Discoms have already finalized the true up claim for RSB for 2016-17 to 2018-19 and currently drafting the same for 2019-20 &amp; 2020-21. TS Discoms would be submitting all their RSB true up claims shortly to the Hon'ble Commission.</p>
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	<p>g) By permitting the permissible additional revenue deficit for current financial year to be recovered in the retail supply tariffs to be determined for next financial year, the principles or parameters being adopted by the Hon'ble Commission for determination of cost of service to each category of consumers can be applied to the additional claims made by the Discoms. Variations in such additional claims that may arise after completion of the current financial year and auditing of accounts may be permitted in the claims of ARR and tariff revision for the third financial year.</p> <p>h) A consumer of power is not paying true-up charges for the power he/she consumed earlier at a different dwelling as a tenant when he shifted to a new dwelling as a tenant or owner. Just as a new consumer is paying true-up charges for power consumed at a dwelling by another consumer earlier when the former is staying now, the consumer who shifted to a new dwelling from the earlier dwelling is paying true-up charges for power consumed by another consumer who stayed in the dwelling earlier. This, in principle, ensures equity, though resultant variations and conflicting claims depending on the level of consumption of power by such consumers in the past elsewhere and at present at a new dwelling may persist. For limitations in practice, it may be difficult to resolve the same. Nevertheless, all those will be adjusted in, and subsumed under, annual retail supply tariffs to be determined by the Hon'ble Commission.</p> <p>i) Since the Hon'ble Commission has been permitting interest on working capital, the same will provide cushion to the Discoms for their additional claims also. As such, the financial interests of the Discoms can be taken care of much faster than what is being allowed under the MYT system.</p>	
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	<p>been participating in the public hearings. It will also avoid scope for litigations and other difficulties that may arise on account of delayed submissions of true up claims and resultant orders of the Hon'ble Commission.</p>	
18	<p>Since the inaction or non-permission of the GoTS has been the cause for the Discoms not filing the ARR and tariff proposals for the said three years, as well as true-up claims, the Government should provide the amounts permissible under true-up claims of the Discoms for the said period. It has been widely reported repeatedly that the Discoms have been waiting for green signal of the Chief Minister for finalizing their proposals of tariff revision and submitting ARR and tariff proposals to the Commission. If Doubting Thomases have any doubts about it, the way in which the ARR and tariff proposals submitted by the Discoms for the year 2022-23 dispels such doubts. In their proposals, that the Discoms have shown the subsidy amount the Government has agreed to provide for the year 2022-23 makes it abundantly clear that with the permission or direction of the Government the Discoms have submitted the subject proposals. Needless to say, non-submission of ARR and tariff proposals and true-up claims is not in the interests of the Discoms.</p>	<p><b>Response to query 18, 19 -</b> TS Discoms have already finalized the true up claim for RSB for 2016-17 to 2018-19 and currently drafting the same for 2019-20 &amp; 2020-21. TS Discoms would be submitting all their RSB true up claims shortly to the Hon'ble Commission.</p>
19	<p>For the reasons explained above, among others, I request the Hon'ble Commission to consider the above points, among others, take appropriate decisions and issue orders or bring about necessary regulations with prospective effect to dispense with the system of true-up.</p>	
20	<p>As a result of the pro-corporate and anti-people measures and policies being and sought to be imposed on the States under the guise of reforms by the</p>	<p>The comments are against the policies of Gol</p>

<p>BJP Government at the Centre, the burdens on consumers are getting multiplied. The following points, among others, confirm this position:</p> <p>a) Nearly 85 per cent of the total expenditure of the Discoms pertains to power purchase cost. The cost of generation of power by coal-based thermal stations has been increasing due to imposition of various taxes by the Government of India and increasing transportation costs. On coal currently 14% royalty on basic price, 5% GST, Rs 400 per tonne towards green energy cess, National Mining Exploration Tax at 2% of royalty and <u>District Mineral Foundation</u> charge at 30% of royalty are being imposed. Then there are the Paryavaran and Vikas Upkar levy of Rs 23 per tonne and Seema Kar/Terminal Tax of Rs 2 per tonne. In addition to these taxes, huge amounts are being transferred to the Gol by public sector coal companies towards dividend. States have their share in royalty. Then, costs of transportation of coal by the railways have been increasing repeatedly. According to the estimation made in a report of the Forum for Regulators (FoR) released in May this year, the largest contribution to the cost is of the <u>freight</u> cost levied by the Railways on transport of coal. In the power purchase cost, the contribution of coal price has been in the range of 25 per cent, rail <u>freight</u> at 41 per cent, road transportation charges at 11 per cent, clean energy cess at 11 per cent and others at 12 per cent. Railway freight has increased by more than 40 per cent in the last four years. Though the Gol has been garnering astronomical sums in the form of such taxes and dividends, it has not been providing any relief in the form of subsidy or otherwise to the Discoms which in turn means to their consumers of power to lessen the burden of power tariffs.</p> <p>b) Under the guise of financial restructuring scheme earlier and UDAY later, Gol has been compelling the States to bear the burdens of accumulated</p>	<p>TS Discoms are obligated to comply with the RPPO targets determined by the Hon'ble Commission.</p> <p>The comments are against the policies of Gol</p>
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	<p>losses and dues of loans of the Discoms. But Gol has not been providing any financial relief to the Discoms.</p> <p>c) In the name of encouraging renewable energy, Gol has been imposing the obligations on the Discoms for purchase of a minimum percentage of RE through RPPO orders of the SERCs. This has been leading to purchase of high-cost and unwarranted RE by the Discoms, imposing avoidable multiple burdens on the consumers. However, the Gol is not providing any financial assistance to the Discoms to lessen the burdens of RE.</p> <p>d) From the year 2008-09 to 2020-21, provisions have been made to the tune of Rs.14.42 lakh crore for writing off bad loans, non-performing assets, etc., by Banks in the country. Against the total operating profits of the Banks for the last 13 years of Rs.15.974 lakh crore, the amounts written off work out to 90.30%, according to the information made public by All India Bank Employees Association. But the Modi Government has not been inclined to see that accumulated dues of loans of the public sector Discoms and TS Genco are written off.</p> <p>e) For relaxing limits of loans that can be taken by the State Government and loans from REC and PFC sanctioned to the power utilities of the State Government, Gol has been imposing various conditionalities. Write off of bad loans sanctioned to the corporate sector and threats to Discoms and Gencos of the State Governments - this is one of the integral components of the class character of the Modi Government.</p> <p>f) In the four private gas-based power stations located in Andhra Pradesh, i.e., GVK extension, Gauthami, Konaseema and Vemagiri, with a total installed capacity of 1498 MW, the TS Discoms have a share of generation capacity of 53.89%. These power stations have been stranded since 2013 for want of supply of natural gas from KG D 6 fields of Reliance Industries Limited as allocated by the Government of India and power has not been available to the Discoms to that extent. As a result, the Discoms have to</p>	<p>TS Discoms are purchasing the power from the short term market whenever the prices are reasonable, and providing continuous supply to the consumers.</p> <p>The comments are against the policies of Gol</p> <p>The comments are against the policies of Gol</p>
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<p>purchase power from the market sources and exchanges, subject to fluctuations in availability and prices.</p> <p>g) The earlier irrational system of price fixation for natural gas and linked to the US \$ and defective production sharing agreements imposed heavy burdens on consumers of power. To the stranded four gas-based stations in AP, natural gas was allocated from the D 6 blocks in the KG basin and Reliance Industries Ltd. failed to supply natural gas to them from March, 2013. In the same KG basin, ONGC was not allowed to increase production of natural gas from its wells. DGH confirmed that RIL had indulged in illegal drawing of natural gas from the wells of ONGC worth about Rs.30,000 crore. Even after RIL started production of natural gas this year from wells in KG basin, the Gol has not directed it to supply natural gas to the power stations in AP as per allocations made. On the other hand, a new contrived system of allowing producers of natural gas to sell it through open auctions has been allowed by the Gol. It is nothing but legalized black marketing. RIL itself is auctioning and purchasing the natural gas produced from wells in the KG basin. The price of natural gas through this legalized black marketing is prohibitive.</p> <p>h) As in the case of coal, in the case of natural gas also taxes being collected by the Gol and dividend from the central public sector utilities like ONGC, constitute a substantial part. But no relief is being provided by the Gol to the State for reducing the burden of tariffs to be paid for purchasing power from the gas-based power stations. Nor is there any move on the part of the Gol to rationalize the pricing system for natural gas by regulating its price based on prudent capital costs and operation and maintenance costs for production of natural gas and reasonable profit.</p> <p>i) Gol has been failing to ensure supply of coal to thermal power stations as per allocations made by it. The recent artificial shortage created for coal has led to shortage for power to the Discoms, forcing them to</p>	<p>The comments are against the policies of Gol</p> <p>Govt. of Telangana, has been rigorously pursuing this matter with the Govt. of India.</p> <p>Govt. of Telangana, has been rigorously pursuing this matter with the Govt. of India.</p>
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<p>purchase in the open market and exchanges where the price for power went up to Rs.15-20 per unit.</p> <p>j) As a part of its anti-people reforms, Gol has been auctioning of coal blocks even for commercial purposes and inviting foreign direct investment into mining of coal in the country. The fact of the matter is that there has been abundant deposits of coal available in the country and the same can be excavated by the public sector coal companies, with necessary support and directions from the Gol, but that is anathema to the Modi Government embarking as it has been on a spree of privatization of public sector utilities both directly and indirectly.</p> <p>k) The Modi Government has been refusing to allocate new coal blocks to the public sector utility, Singareni Collieries Company Limited. At the same time, it is moving in the direction of auctioning four coal blocks of SCCL. Despite the CM of Telangana, Sri K Chandrasekhara Rao, writing to the Prime Minister to stop auctioning the blocks and allocate the same to SCCL and almost all the trade unions of workers of SCCL went on strike for three days against the move of the Gol, the Modi Government continues to be intransigent.</p> <p>l) SCCL requested the Ministry of coal for allocation of coal from its own mines, instead of from Naini coal block in Odisha, to its stage I Singareni Thermal Power Project (1200 MW). SCCL made it clear, in its letter dated 6.7.2015, to the Ministry of Coal that it would be able to supply the coal to its own thermal plant without affecting the existing FSA/linkage quantity to other allottees. It is strange that the Ministry of Coal allocated coal from Odisha to the power project of SCCL, in which the Government of Telangana has ownership share of 51 per cent, while Gol has 49 per cent, instead of allocating coal from the mines of SCCL which is available. Despite repeated requests of the GoTS, seeking allocation of coal from SCCL to its project, there has been no positive response from the Gol even after six years. As a result, consumers of power in the State continue</p>	<p>TS Govt. has submitted its views on the EA amendment bill, to the Gol, opposing certain amendments</p>
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	<p>to pay higher variable costs for power being purchased from this project due to avoidable higher costs for transportation of coal from the Naini coal block in Odisha.</p> <p>m) The amendments to EA being proposed by the Gol, if come into force, even in the face of stronger opposition from many States, engineers and workers in the power sector, public spirited experts and several political parties, will lead to disastrous consequences. "Animal spirits" have been arisen and predatory instincts of the private corporate houses have been in full play as a result of the neo-liberal policies and crony capitalism of the Gol. For the failures of commission and omission of the Gol, it is the States which are being penalized with the burdens being passed on to the consumers in the power sector, in particular, and to the public at large in general. Taking undue advantage of power being in the concurrent list of the Constitution, Gol has been exercising its authority arbitrarily, without any responsibility and accountability for the adverse consequences and avoidable burdens being imposed on the States and consumers that have been arising as a result of implementation of its policies, directions and actions.</p>	
21	<p>Forum for Regulators, in its report, made several meaningful and prudent suggestions. To reduce the financial burden on the Discoms, the Forum suggested that the Centre should share the cost of stranded power with the states. It said central funding should cover the fixed cost being paid by the states for the power generation assets that are no longer functional. States across the country have been bearing the cost of stranded power generation assets to the tune of Rs 17,442 crore. The report said 12 states have been paying the fixed cost for the units which are no longer functional but the states continue to have power purchase agreements (PPAs) with them. The surplus energy from these units stands at 129,251 MUs for which the</p>	<p>TS Discoms shall look into this matter in detail and take necessary action in line with the directions given by the Hon'ble Commission.</p>

consumer is paying but not getting the electricity. The fixed cost of stranded generation assets is being paid for by the consumers without getting any benefit. Surplus energy of this magnitude and resultant costs (in the range of Rs 1.34 per unit) are a matter of great concern," said the FoR report. Most of the stranded units are gas-based power generation units which are not functioning for lack of domestic gas supply. Under the PPAs, power Discoms continue to pay fixed cost even if there is no supply. The Forum recommended that the burden of the stranded generation assets should be shared by the Central Government and the State Government respectively in the ratio of 60:40, in line with central plan funding. The report has identified major cost factors that impact the price of electricity in the country. It suggested that "Railways should be brought under an independent regulatory body as they enjoy monopoly position and are still unregulated at present." Coal sector also be brought under independent regulator "at the earliest." It said, "Coal pricing needs to be regulated as in other sectors, since it is virtually a monopoly." It said the Centre should also consider subsidising railway freight for coal for a distance beyond 750 km. Among other suggestions to reduce power cost, the FoR recommended transmission planning based on accurate demand forecasts. It said mismatch in generation and transmission planning leads to stranded transmission assets and additional cost is being borne by the states. It has said the renewable energy projects with storage should be encouraged so that surplus transmission capacity can be utilised. Other recommendations made by the FoR include - Clean Energy Cess should be ploughed back to electricity sector. Clean Energy Cess (CES) of Rs 400 per tonne, levied on coal should be given to the electricity sector for meeting the cost of environment norms. (In 2018, it was subsumed under the Goods & Services Tax). "With due regard to the increasing investment in renewables, the rationale for continuation of this cess needs review. There is a strong case for reduction

	<p>in clean energy cess. Proceeds from this cess be ploughed back to the electricity sector to mitigate incremental cost on account of new environmental norms as per contribution made by each State." In 2019-20, the CEC collection stood at Rs 24,883 crore.</p>	
22	<p>In his letter dated 5.12.2021, addressed to the Chief Ministers of Telangana and Andhra Pradesh, Dr E A S Sarma garu, former secretary, Ministry of Power, Gol, said, inter alia, that "governments in some States like AP have been trying to renegotiate PPAs entered into by their predecessors, in view of the exorbitant tariffs that such agreements will give rise to, adversely affecting the interests of the consumers. The previous governments had indiscriminately signed one-sided agreements with the private promoters of solar electricity generating plants, knowing well that solar technology is an evolving one with a declining trend in the unit costs. Surprisingly, instead of lending support to the States and protecting the consumers' interests, the Union Power Ministry took sides with the private promoters and asked the States to put a stop to such renegotiation. While there is always the question of the sanctity of a contract and the legal implications of renegotiating contracts, it is for a State to decide on the course of action in the interest of the consumers. The States are well equipped in dealing with such contracts and finding legally acceptable ways to protect the interests of the consumers. In the spirit of upholding the federal balance between the Centre and the States, the Centre should allow the States to act on their own, without interfering with their authority.</p> <p>"A similar issue arises in the case of PPAs signed in the past by some States with the private promoters of thermal power plants with a highly regressive provision in the name of "<i>deemed generation clause</i>": which mandated the State utilities compensating the private promoters for 100% of the fixed costs, irrespective of whether the plant has supplied electricity or not. It is the electricity consumer who pays for such malfeasance on the</p>	<p>TS Discoms understand that due to Telangana state being the first movers in Renewable Energy purchases and owing to its obligation towards the RPO compliance, TS DISCOMs had entered into RE PPAs from 2012 (legacy contracts).</p> <p>TS Discoms have been proactively exploring the cheaper solar options and as a result have entered into Power Supply Agreement (PSA) with 1,692 MW NTPC solar plants located in Rajasthan, Tamil Nadu and Gujarat, under the CPSU Scheme, at a rate of less than INR 3 per kWh. Telangana Discoms would continue to optimise its overall power procurement in the future. TS Discoms are liable for a penalty for non-compliance of RPOs for FY 2020-21 (Min: INR 148 Cr, Max: INR 296 Cr.), in order to comply with the RPO trajectories laid down by MNRE.</p>

	<p>part of the State administration, which by any logic cannot be justified. In a way, the new Bill before the Parliament will also prevent the State from renegotiating such PPAs to safeguard the interests of the consumers.</p> <p>“The Punjab Government has faced public criticism in the matter of high tariffs resulting from such PPAs signed in the past. In order to protect the consumers' interests, the Punjab government has since circulated a White Paper justifying the need for renegotiating the PPAs and introduced a Bill for that purpose (Punjab Renewable Energy Security, Reform Termination and Redermination of Power Tariff Bill) in the Punjab Assembly. I have enclosed here copies of the White Paper and the Bill for your ready reference. It is an excellent initiative taken by the Punjab Government which inspires confidence among the people of the State.</p> <p>“I wish the Centre had emulated the example of Punjab and displayed the same sense of public accountability in dealing with electricity.</p> <p>“Perhaps, as Punjab has done, the States should similarly assert their authority under the Constitution and enact laws that preserve their autonomy in order to safeguard the electricity consumers' interests. Such laws need to be State-specific. In those States where the consumers are unduly burdened by the "<i>deemed generation clause</i>" of the PPAs signed in the past with thermal power plants, the new law could extend to such PPAs also.”</p>	
23	<p>In the face of the onslaught of the Modi Government on the interests of public at large, public sector utilities, the working class, rights and interests of the States in the power sector, as in other sectors, the TRS Government in the State has not been fighting against such onslaughts firmly. It is failing</p>	<p>TS Govt. has been pursuing with the Gol, on the parameters adversely affecting the TS Discoms.</p>

	<p>to take cognizance of saner alternatives suggested by the FoR, public spirited experts, and associations of engineers and workers working in the power sector, etc. It is failing utterly to articulate alternatives and put forth meaningful and justifiable demands and in taking initiative to move in the right direction.</p>	
24	<p>With factual situation in the power sector in the State continuing to be shrouded in secrecy for the last three years, there has been no scope for studying the impact of policies and decisions of the Government and suggesting corrective measures. As per the presentation made by the Discoms on 30.6.2021 before TSERC, the installed capacity in the State would reach 25,760 MW by 2022-23. Since this generation capacity is very huge, need for justifying the same vis a vis growing demand and examining the same, before giving consent to new projects, is very much imperative. TS Discoms informed that there has been no load relief from 20.11.2014 and that, as on 1.6.2021, against a maximum demand of 13,688 MW, the contracted capacity is 16,603 MW. With this capacity, when the Discoms are in a position to meet maximum demand during 2021-22, the transmission contracted capacity approved by the Commission for the same year to the tune of 21,370.12 MW is, obviously, very high. Then, what is the basis for additional requirement of an additional installed capacity of 9,157 MW (25,760 – 16,603 = 9,157) by 2022-23, i.e., an increase of 55.15%, within a span of less than two years? Despite repeated demands from those who have been participating in the public hearings being conducted by TSERC, no long-term load forecast, resource plan, procurement plan, etc., have been submitted by the Discoms and other power utilities so far or made public, leave aside holding public hearings on the same. The submissions of the Discoms on need for additional generation capacities are general in nature</p>	<p>Telangana Discoms have a dedicated wing (Telangana State Power Coordination Committee) to focus on all the power purchase related matters of the Discoms. TSPCC explores all the options of power purchase cost optimisation, while designing its power procurement planning strategies. Under the purview of TSPCC, Telangana Discoms have been procuring power via an adequate mix of Long term, Medium term and Short term arrangements, depending on the factors like ensuring satisfactory planning (for meeting demand), sourcing options availability, cost competitiveness etc.</p> <p>TS Discoms would like to clarify that the load generation balance has to be assessed based on the available contracted capacities to TS Discoms, which include the State Genco capacities, and % share of the allocated CGS capacities to TS Discoms, and not link the same with the state installed capacity. As the entire installed capacity in the state may not cater to the demand of TS Discoms, as some of them might sell power outside the state or to the Open Access consumers within the state.</p> <p>"TS Discoms would like to clarify that out of the total installed capacity in the state, the capacities of Hydro energy sources operate only for a few months of the year &amp; capacities of Non-Conventional energy sources operate only for a few hours of a day and not round the clock. Hence, it is not appropriate to consider the installed capacities for hydro and NCS, while evaluating the demand supply scenario of the state."</p>

	<p>and do not give specific requirement of additional power year-wise and major source-wise.</p>	<p>The contracted capacity approved by the Hon'ble Commission in its transmission MYT order was predominantly due to the expected surge in LIS loads. The peak demand of the TS Discoms is expected to increase from 13,688 MW in the upcoming future, as a result of the LIS loads. TS Discoms are obligated to supply 24x7 power supply to its consumers (including agriculture), and are bound to contract with additional capacities to ensure no power interruptions in state.</p> <p>TS Discoms have submitted the Resource Plan for the 4<sup>th</sup> Control Period (FY 2019-20 to FY 2023-24), on 31<sup>st</sup> October 2018, before the Hon'ble Commission, which contains the long term sales and load forecast. TS Discoms are in the process of filing the power procurement plan for the aforesaid period.</p>
25	<p>For the year 2022-23, the Discoms have shown availability of total generation capacity of 19987.95 MW plus 550 MW from PTC India Ltd. under medium-term for a few months in the year. They have shown availability of power to the tune of 87288 MU and requirement of 84222 MU - 55299 MU for SPDCL and 28923 MU for NPDCL - with a surplus of 3066 MU. When such is the position, where is the need for 25,760 MW as projected by the Discoms by 2022-23? The availability of power is estimated after taking 76% PLF for thermal stations of TS Genco and reduction of availability of hydro power from 4921 MU for 2021-22 to 4000 MU for 2022-23. The Discoms have informed that the expected CoD of the 4<sup>th</sup> unit of BTPS (270 MW) is 1<sup>st</sup> January, 2022, that YTPS first unit (800 MW) is expected to be commissioned on 1<sup>st</sup> March 2023 and that the expected CoDs of Telangana STPP (2x680 MW) are 1<sup>st</sup> October, 2022 (Unit I) and 1<sup>st</sup> January, 2023 (Unit II). In other words, availability of power would increase substantially for the year 2023-24.</p>	<p>Telangana Discoms have a dedicated wing (Telangana State Power Coordination Committee) to focus on all the power purchase related matters of the Discoms. TSPCC explores all the options of power purchase cost optimisation, while designing its power procurement planning strategies. Under the purview of TSPCC, Telangana Discoms have been procuring power via an adequate mix of Long term, Medium term and Short term arrangements, depending on the factors like ensuring satisfactory planning (for meeting demand), sourcing options availability, cost competitiveness etc.</p> <p>TS Discoms have considered the energy availabilities for FY 2022-23, as per the projections shared by the respective generating station and energy requirement as per the estimated sales projections, and loss levels. While, it has led to an energy surplus of 3,066 MU, on an annual basis, the same may not be true for all months of the year i.e. in some months of FY 2022-23, TS Discoms may have an energy deficit situation.</p>



		<p>"TS Discoms would like to clarify that out of the total installed capacity in the state, the capacities of Hydro energy sources operate only for a few months of the year &amp; capacities of Non-Conventional energy sources operate only for a few hours of a day and not round the clock. Hence, it is not appropriate to consider the installed capacities for hydro and NCES, while evaluating the demand supply scenario of the state."</p> <p>TS Discoms are obligated to supply 24x7 power supply to its consumers (including agriculture), and are bound to contract with additional capacities to ensure no power interruptions in the state. Having said that, in case, there is an energy surplus scenario in some time block durations, TS Discoms shall engage in the sale of such surplus power, based on the cost competitiveness.</p> <p>Also, it is to be clarified that the hydro availability of 4,921 MU in FY 2021-22, is predominantly due to a record high hydro generation of 3,074 MU in H1 FY 2021-22, which can be attributed to a good monsoon season in H1 FY 2021-22.</p> <p>It is to be noted that the Hydro generation was 3,424 MU only in the FY 2020-21 and such seasonal conditions in FY 2021-22 can't be considered as a norm and used for the estimates for FY 2022-23. Hence, a moderated reduction over FY 2021-22, has been considered for Hydro availability in FY 2022-23.</p>
26	<p>For the year 2022-23, SPDCL has projected total sales of 48823 MU and transmission and distribution losses of 6476 MU (11.71 per cent). NPDCL has projected total sales of 25905 MU and transmission and distribution losses of 3018 MU (10.43 per cent). For the year 2018-19, the Hon'ble Commission approved T&amp;D losses of SPDCL as 13.77 percent and 13.62 percent for NPDCL. In their presentation made before the Hon'ble Commission on 30.6.2021, the Discoms claimed that, after formation of the Telangana State,</p>	<p>TS Discoms would like to clarify that the T&amp;D losses for FY 2022-23, have been computed based on the voltage-wise distribution loss targets and TS Transco loss targets prescribed by the Hon'ble Commission in its Wheeling Tariff Order for the 4<sup>th</sup> Control Period and the Transco MYT Order for the 4<sup>th</sup> Control Period, respectively. Hence, the loss reduction mentioned in the said duration, is as per the loss targets set by the Hon'ble Commission.</p>

	<p>a sum of Rs.31,968 crore has been invested for transmission and distribution networks. Despite such investments, SPDCL has projected a reduction of T&amp;D losses by 2.06 percent for 2022-23 compared to those approved by the Commission for the year 2018.19 and NPDCL has projected the same by 3.19 percent. On average, for a period of four years, the reduction works out to about 0.5 per cent for SPDCL and 0.80 per cent for NPDCL. Compared to the higher T&amp;D losses that have been continuing year after year, the proposed reduction is meager. Moreover, that the Discoms have been claiming implementation of free supply of power to agriculture for 24 hours a day as per the policy of the Government, it is obvious that a percentage of theft and pilferage of power can be shown as agricultural consumption. For agriculture, power is not required throughout the day and throughout the year. It is required during agricultural seasons only. The projections of agricultural consumption of power being made by the Discoms and the methodology they are adopting for the same under the arrangement of free supply are questionable. In other works, there is scope for reducing T&amp;D losses substantially than what is being projected by the Discoms. Have Transco and the Discoms achieved the targets of reduction of T&amp;D losses (AT&amp;C losses) as agreed to under UDAY?</p>	<p>TS Discoms would like to state that the assessment of agricultural consumption is done every month, as per the ISI methodology, approved by the Hon'ble Commission and the same are submitted to the Hon'ble TSERC. For this purpose, the sample for each capacity (i.e., kVA rating) is chosen using random sampling procedure. The consumption of each of these sample DTRs are measured each month. The average consumption per DTR is then estimated from the total consumption of all the sample DTRs in each circle. The average DTR consumption of each capacity of DTR population is the basis for extrapolation of the agricultural consumption. Since the metering is done on the LV side of the agricultural DTRs, the assessed consumption as per the procedure includes the consumption of any unauthorized agricultural services, if present.</p> <p>Though, the TS Discoms, like many other states in the country, have not achieved the UDAY AT&amp;C loss level targets yet, but have shown a significant reduction in its actual distribution loss levels from FY 2017-18 to FY 2020-21 (from 11.35% to 9.81% for TSSPDCL, from 11.01% to 9.03% for TSNPDCL). This reduction was possible due to the various loss reduction measures and strategic investments undertaken by the TS Discoms.</p>
27	<p>The Discoms have maintained that the "main reasons" for their "losses" are the policies of the Government of India - increase in clean energy cess on coal from Rs 50 per tonne to Rs.400 per tonne; increase in cost of coal by about 6 percent to 10 percent every year; increase in railway freight by 40 percent in the last four years; and increase in per unit cost of thermal power plants due to their backing down to enable must-run status of renewables. When increases in variable costs are being projected by the Discoms and factored into their annual power purchase cost by the Hon'ble Commission or allowed as pass through under their true-up claims, it naturally leads to</p>	<p>TS Discoms would like to state that the last tariff hike in the state was approved by the Hon'ble Commission in FY 2016-17.</p> <p>While, it has been five years now since the last tariff hike, but in the said duration, all the costs incurred by TS Discoms in terms of Power purchase cost, Transmission and Network cost etc. have increased significantly, leading to a constantly increasing revenue gap.</p>

	<p>increase in cost of service and revenue requirement of the Discoms, but they cannot be the reasons for “losses” of the Discoms. The Discoms have not explained the other reasons for the revenue deficits they have projected in the subject filings.</p>																																													
28	<p>The Discoms have not explained the reasons and components that have contributed to their projected revenue deficits. What are the latest accumulated dues the Discoms have to collect from different categories of consumers, especially from the departments of the Governments, both the Central and State, and local bodies? What are the dues from the Government in terms of subsidy and schemes like UDAY? What are the dues the Discoms have to pay to generators/suppliers of power, including TS Genco? What are the dues the Discoms have to clear to Banks and financial institutions from whom they borrowed loans and the interest thereon?</p>	<table border="1"> <thead> <tr> <th colspan="2" data-bbox="1136 435 1944 480"><b>Category wise Pending arrears as on 31.12.2021</b></th> </tr> <tr> <th data-bbox="1136 480 1749 581"><b>Consumer Category</b></th> <th data-bbox="1749 480 1944 581"><b>Amount (in Crs.)</b></th> </tr> </thead> <tbody> <tr> <td colspan="2" data-bbox="1136 581 1944 618"><b>LT:</b></td> </tr> <tr> <td data-bbox="1136 618 1749 662">Category - I - Domestic supply</td> <td data-bbox="1749 618 1944 662">469.30</td> </tr> <tr> <td data-bbox="1136 662 1749 706">Category - II - Commercial</td> <td data-bbox="1749 662 1944 706">106.37</td> </tr> <tr> <td data-bbox="1136 706 1749 750">Category - III - Industrial supply</td> <td data-bbox="1749 706 1944 750">15.23</td> </tr> <tr> <td data-bbox="1136 750 1749 794">Category - IV - Cottage Industries</td> <td data-bbox="1749 750 1944 794">0.50</td> </tr> <tr> <td data-bbox="1136 794 1749 837">Category - V - Irrigation &amp; Agriculture</td> <td data-bbox="1749 794 1944 837">77.29</td> </tr> <tr> <td data-bbox="1136 837 1749 881">Category - VI - Public Lighting &amp; PWS</td> <td data-bbox="1749 837 1944 881">1594.86</td> </tr> <tr> <td data-bbox="1136 881 1749 925">Category - VII - General Purpose</td> <td data-bbox="1749 881 1944 925">37.43</td> </tr> <tr> <td data-bbox="1136 925 1749 969">Category - VIII - Temporary Supply</td> <td data-bbox="1749 925 1944 969">0.41</td> </tr> <tr> <td data-bbox="1136 969 1749 1013"><b>Sub - total (a)</b></td> <td data-bbox="1749 969 1944 1013"><b>2301.39</b></td> </tr> <tr> <td colspan="2" data-bbox="1136 1013 1944 1050"><b>HT:</b></td> </tr> <tr> <td data-bbox="1136 1050 1749 1094">Category - I - Industrial</td> <td data-bbox="1749 1050 1944 1094">898.21</td> </tr> <tr> <td data-bbox="1136 1094 1749 1138">Category - II - Others</td> <td data-bbox="1749 1094 1944 1138">28.27</td> </tr> <tr> <td data-bbox="1136 1138 1749 1182">Category - III - Aviation activities at Air Ports</td> <td data-bbox="1749 1138 1944 1182">1.70</td> </tr> <tr> <td data-bbox="1136 1182 1749 1226">Category - IV - Irrigation &amp; Agriculture</td> <td data-bbox="1749 1182 1944 1226">4744.94</td> </tr> <tr> <td data-bbox="1136 1226 1749 1269">Category - V - Railway Traction</td> <td data-bbox="1749 1226 1944 1269">3.74</td> </tr> <tr> <td data-bbox="1136 1269 1749 1313">Category - VI - Colony Lighting</td> <td data-bbox="1749 1269 1944 1313">0.47</td> </tr> <tr> <td data-bbox="1136 1313 1749 1357">Category - VII - Temporary Supply</td> <td data-bbox="1749 1313 1944 1357">14.68</td> </tr> <tr> <td data-bbox="1136 1357 1749 1401">Category - VIII - Electricity Co -op.societies</td> <td data-bbox="1749 1357 1944 1401">495.84</td> </tr> <tr> <td data-bbox="1136 1401 1749 1438"><b>Sub-total (b)</b></td> <td data-bbox="1749 1401 1944 1438"><b>6187.86</b></td> </tr> </tbody> </table>	<b>Category wise Pending arrears as on 31.12.2021</b>		<b>Consumer Category</b>	<b>Amount (in Crs.)</b>	<b>LT:</b>		Category - I - Domestic supply	469.30	Category - II - Commercial	106.37	Category - III - Industrial supply	15.23	Category - IV - Cottage Industries	0.50	Category - V - Irrigation & Agriculture	77.29	Category - VI - Public Lighting & PWS	1594.86	Category - VII - General Purpose	37.43	Category - VIII - Temporary Supply	0.41	<b>Sub - total (a)</b>	<b>2301.39</b>	<b>HT:</b>		Category - I - Industrial	898.21	Category - II - Others	28.27	Category - III - Aviation activities at Air Ports	1.70	Category - IV - Irrigation & Agriculture	4744.94	Category - V - Railway Traction	3.74	Category - VI - Colony Lighting	0.47	Category - VII - Temporary Supply	14.68	Category - VIII - Electricity Co -op.societies	495.84	<b>Sub-total (b)</b>	<b>6187.86</b>
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		<b>Total (a+b)</b>	<b>8489.25</b>															
29	<p>For the year 2022-23, the Discoms have projected a total sales of 74727 MU. They have projected availability of NCE/RE to the extent of 8953 MU. The Discoms have projected availability of hydel power of 4000 MU for 2022-23 against 4921 MU for 2021-22. After reducing hydel availability of 4000 MU, the projected sales for 2022-23 work out to 70727 MU. The percentage of RE out of total sales minus hydel power works out to 12. As per the order given by the Hon'ble Commission on renewable power purchase obligation dated 30.4.2018, the Discoms have to purchase a minimum of 8 percent RE out of total consumption for the year 2021-22. Out of that minimum purchase, solar power should be 7.10 per cent and non-solar power 0.90 per cent. Out of the projected non-hydel power sales of 70727 MU, solar power purchase of 8394 MU works out to 11 percent. Knowing full well that for purchasing power from must-run RE/NCE stations, why did the Discoms enter into long-term PPAs to purchase RE exceeding the minimum of 8 per cent, i.e., more by 4 percent, by the year 2022-23? When the Hon'ble Commission held public hearing in 2018 on the proposals of RPPO, the Discoms then represented by the then CMD of the erstwhile TSCPDCL, Sri G Raghuma Reddy garu, strongly pleaded before the Commission not to enhance the minimum percentage under RPPO from the then prevailing 5 percent. Then, who forced the Discoms to enter into PPAs with RE units on long-term basis and at higher costs exceeding their minimum obligation under RPPO by fifty percent?</p>	<p>Further, the said information is already available in the TS Discoms' annual reports, which are available in the Discom websites.</p> <p>TS Discoms would like to clarify that the RPO computations have to be done on the Energy Input and not Energy sales.</p> <p>TS Discoms would like to state that while entering the PPAs for purchase of RE power, TS Discoms are also examining the RPPO targets in vogue both at State level &amp; National level. Ministry of Power notified Long term growth trajectory of Renewable Purchase Obligations (RPOs) for Solar as well as Non-Solar for three years' period from 2019-20 to 2021-22, which are as under</p> <table border="1" data-bbox="1163 781 1850 1052"> <thead> <tr> <th>Year/RPPO</th> <th>2019-20</th> <th>2020-21</th> <th>2021-22</th> </tr> </thead> <tbody> <tr> <td><b>Non-Solar</b></td> <td>10.25%</td> <td>10.25%</td> <td>10.50%</td> </tr> <tr> <td><b>Solar</b></td> <td>7.25%</td> <td>8.75%</td> <td>10.50%</td> </tr> <tr> <td><b>Total</b></td> <td>17.50%</td> <td>19.00%</td> <td>21.00%</td> </tr> </tbody> </table> <p>Currently TS Discoms are exceeding the RPO targets as notified by TSERC, however going further these targets are further likely to be enhanced as the targeted RE capacity addition at India level has been revised to 450 GW by 2030 (350 GW Solar and 100 GW Non-Solar). Also, due to the generation from the Rooftop solar and the future participation in KUSUM scheme, the TS Discoms are likely to exceed the targets set by the Hon'ble Commission. Though at present, it is not mandatory for the State DISCOMs to comply with the MoP notified RPPO trajectory, it is likely that the</p>	Year/RPPO	2019-20	2020-21	2021-22	<b>Non-Solar</b>	10.25%	10.25%	10.50%	<b>Solar</b>	7.25%	8.75%	10.50%	<b>Total</b>	17.50%	19.00%	21.00%
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		<p>State RPPOs may be directed to align with the MoP RPPO, in terms of National Tariff Policy. And particularly in view of the proposed Amendment to the section 142 of the Electricity Act 2003, which proposes for imposing penalties (ranging from Rs.0.25/kWh to Rs. 2.00/kWh) for non-compliance of RPPO targets, it is required that the TS Discoms shall be prepared to meet the larger RPPO targets in phased manner, that may be imposed in future by MOP, Gol on all the states, including the state of Telangana.</p> <p>TS Discoms are liable for a penalty for non-compliance of RPOs for FY 2020-21 (Min: INR 148 Cr, Max: INR 296 Cr.), in order to comply with the RPO trajectories laid down by MNRE.</p>
30	<p>The Discoms have requested the Commission to consider any deviation in actual sales vs approved for the category of lift irrigation schemes due to high impact of such deviations in the upcoming lift irrigation projects will cause on the overall sales and projected revenue. They have requested the true up of actual sales and revenue for this category be allowed as an exception in the coming year, as this is the year where commissioning of majority of the new pumps have been projected and any delay in the same will impact the financial positions of the Discoms very severely. They requested the Commission to make necessary additional provisions to the existing clauses in Regulation No.4 of 2005 of APERC, considering the exceptional scenario involving a subsidizing category. In other words, the projected sales for LIS projects may vary, depending on the stage of their commissioning. For that the responsibility rests on the department of irrigation. True-up/true-down arises only after the variations take place actually. There should be necessary coordination between the department of irrigation and the Discoms to achieve synchronization of commissioning of the LIS projects and necessary arrangements for supply of required power to them, with obligations on both sides to stick to their respective schedules</p>	<p>TS Discoms would like to state that currently there is no provision of revenue true-up in the existing state regulations in place. Many other states in India have such provisions that take care of the variation in sales mix and hence the resultant revenue variation, along with the variation in the actual costs vis-à-vis the approved costs, are true-up on a regular basis.</p> <p>Such variation in the actual revenue vis-à-vis the approved revenue severely affects the financial condition of TS Discoms. TS Discoms are in the process of filing a petition, requesting amendments in the existing regulations, in this regard.</p> <p>TS Discoms would like to clarify that the LIS sales projections have been considered based on the inputs received from the department of Irrigation, from various LIS schemes/ projects. Having said that any variation in the actuals vs approved sales, has to be passed on to the consumers and not borne by Discoms, as the scope of variation in sales is beyond the scope of the TS Discoms. TS Discoms have adopted two-part tariff for LIS consumers, to enable recovery of fixed costs.</p>

	<p>and to bear the burdens of deviations that may arise in practice as a result of their failures of commission and omission. Such burdens should not be imposed on the consumers of power. There is no scope for an exception. Therefore, we request the Hon'ble Commission not to make any additional provisions to the existing clauses in the Regulation which the Discoms have not explained specifically to permit true-up as an exception.</p>	<p>Due to the significantly higher quantum of LIS sales projections in FY 2022-23 (~19% of total sales), TS Discoms requested the Hon'ble Commission for an exception in FY 2022-23, in this regard.</p>
31	<p>Though the Discoms have projected an availability of surplus power to the tune of 3066 MU, they have not shown month-wise requirement and availability of surplus or deficit during the year 2022-23. They have not considered any sale of surplus power, as the cost of such additional purchase is expected to be higher than the revenue from sale of surplus energy. The estimated energy deficit, which is not quantified, is proposed to be bought from the short-term market at a projected cost of Rs.3.85 per unit. The Discoms have not explained the basis for this price, even while showing that price for 2021-22 as Rs.3.59 per unit. Though the Discoms have mentioned increase in per unit cost of thermal power plants due to their backing down to purchase must-run renewable energy, they have not projected the quantum of thermal power to be backed down and fixed charges to be paid therefor. They have not given data relating to backing down of thermal power during 2019-20, 2020-21 and 2021-22 and fixed charges paid therefor. For availability of power, the Discoms have taken overall PLF of thermal stations of TS Genco as 76 percent for the year 2022-23 against 70 percent for 2021-22. The threshold level of PLF has to be taken into account as considered in the respective PPAs.</p>	<p>TS Discoms have considered the energy availabilities for FY 2022-23, as per the projections shared by the respective generating station and energy requirement as per the estimated sales projections, and loss levels. While, it has led to an energy surplus of 3,066 MU, on an annual basis, the same may not be true for all months of the year. TS Discoms also clarify that the installed capacity of hydro stations, is applicable only for a few months of the year.</p> <p>TS Discoms have shown the month-wise energy availability, month-wise sales and voltage-wise losses, as per the prescribed RSF formats. The month-wise energy deficit/ surplus can be arrived based on the abovementioned parameters.</p> <p>TS Discoms have not estimated any sale of surplus power in FY 2022-23 due to the cost competitiveness i.e. TS Discoms have considered the energy dispatch in line with the energy requirement only. For showing sale of surplus power, TS Discoms have to purchase power at a higher rate and sell such power at a cheaper rate, which is not feasible.</p> <p>Though, on a real time basis, if the market conditions are favorable, TS Discoms shall engage in the sale of surplus power in various time blocks, as done in the recent years. The details of quantum of surplus sale and revenue earned, from FY 2015-16 to FY 2021-22, have already been submitted to the Hon'ble Commission, as part of the Additional information requested.</p>

		<p>The basis for short-term purchase rate has been mentioned in the ARR filing petition under the Bilateral purchase section – <i>“Rates for such purchase for H2 FY 2021-22 and FY 2022-23, have been considered in line with actuals for FY 2020-21”</i>.</p> <p>The Short-term purchase rate for FY 2020-21 was INR 3.85/kWh. While, for H1 FY 2021-22, the same was INR 3.23/kWh. Hence, the arrived rate is INR 3.59/kWh for FY 2021-22 and INR 3.85/kWh for FY 2022-23.</p> <p>TS Discoms are not obligated to submit the information on backing down of generation, as per the prescribed filing formats and write-ups. TS Discoms shall abide by the instructions of the Hon’ble Commission for submission of any additional information, as required.</p>
32	<p>The Discoms have rightly pointed out that meeting the irrigation needs is of primary importance and generation of power is subject to meeting the irrigation needs. They have explained that a high quantum of 3094 MU of hydel generation during the first half of 2021-22 can be attributed to a good monsoon and that a similar trend may continue in 2022-23. In that case, the Discoms have not explained the basis for reducing availability of hydel power to 4000 MU for the year 2022-23 from 4921 MU for 2021-22. The Discoms have also not explained as to why no availabilities of hydel power from Machkund and Tungabhadra projects have not been considered.</p>	<p>TS Discoms would like to clarify that the hydro availability of 4,921 MU in FY 2021-22, is predominantly due to a record high hydro generation in H1 FY 2021-22, which can be attributed to a good monsoon season in H1 FY 2021-22.</p> <p>It is to be noted that the Hydro generation was 3,424 MU only in the FY 2020-21 and such seasonal conditions in FY 2021-22 can’t be considered as a norm and used for the estimates for FY 2022-23. Hence, a moderated reduction over FY 2021-22, has been considered for Hydro availability in FY 2022-23.</p> <p>The detailed reasons for considering no availabilities of hydel power from Machkund and Tungabhadra projects, have already been submitted to the Hon’ble Commission, as part of the Additional information requested. The objector is kindly requested to refer to the same.</p>
33	<p>The capital costs of thermal power projects taken up by TS Genco tended to be very high. Execution of the projects also delayed for long periods, leading to escalation in capital cost and interest during construction. As per the</p>	<p>TS Discoms would like to state that the Hon’ble Commission will determine the Capital Cost and tariff after Prudence Check based on the bench mark norms specified from time to time.</p>

	<p>latest estimates shown during public hearings conducted by the Hon'ble Commission in the month of June, 2021, the capital costs of some of the projects per MW in Crore Rupees are given below:</p> <p style="margin-left: 40px;">a) Bhadradri TPS                      Rs.7.90 cr  b) Yadadri TPS                         Rs.7.49 cr  c) Kakatiya TPP stage I             Rs.5.92 cr  d) KTPP stage II                        Rs.7.233 cr  e) KTPS stage VII                      Rs.6.935 cr</p> <p>These capital costs are likely to be revised upwards again. This is another dubious distinction under the KCR regime. Such inflated capital costs, if permitted by the Commission, would lead to higher fixed charges for purchasing power from them and impose avoidable additional burdens on the consumers. The earlier Hon'ble Commission had disallowed huge amounts from capital costs shown for some of the thermal power projects by TS Genco and SCCL.</p>	<p>While determining the Capital cost or tariff of the project, the Hon'ble Commission will scrutiny the reasonableness of the capital expenditure, financing plan, interest during construction, use of efficient technology, cost overrun due to delay in execution of the project, time overrun and such other matters considered appropriate.</p>
34	<p>There have been manipulations in power purchase agreements as a result of which avoidable hefty additional burdens are being imposed on the consumers of power. The following are some of the points, among others, which confirm this:</p> <p>a) The then TSERC had given its consent to the PPA the TS Discoms had with Thermal Powertech Corporation India Limited for purchasing 570 MW thermal power for a period of 8 years. The terms and conditions of the bidding were manipulated to facilitate TPCIL becoming the sole bidder. The fixed cost allowed is higher by Rs.0.82 per kwh, compared to the fixed cost of Rs.1.82 per kwh at which the same TPCIL is supplying power</p>	<p>The earlier PPA was signed for 500 MW (Net) by all four DISCOMs under Case-I bidding route for supply of power from Unit-I (660 MW) of the TPCIL. This procurement was initiated in the year 2010 and the financial bid was submitted in 2011. The rates submitted in 2011 cannot be compared with the prices in 2016. TPCIL is not the sole bidder as claimed, number of bids are received in response to the tender.</p> <p>The earlier PPA was signed for 25 years whereas the PPA for 570 MW was signed in 2016, that too for a period of 8 years only. Hence the rates in the both bids are not comparable. Tariff quoted in shorter period are slightly higher than tariffs committed for 25</p>



<p>from a plant its same project under the existing PPA with the four Discoms of TS and AP. As a result, an additional and avoidable burden of Rs.2784 crore is being imposed on the consumers during the period of the PPA. With detailed analysis of the order, I wrote a letter dated 25.2.2016 to the TSERC, the contents of which were published in the media, but there was no response to it from the Commission and the parties to the PPA.</p> <p>b) The MoU and PPA signed with Chattisgarh Power Distribution Company Limited on long-term basis has been questionable and detrimental to the interest of consumers of the TS Discoms. Objectors filed elaborate submissions questioning that deal before TSERC during public hearing. The tariff is projected to be Rs.3.90 per kwh for 2022-23, as it was for the last two years.</p> <p>c) When TSERC acted as a one-man Commission, several petitions filed by private developers, who had PPAs with TS Discoms for supply of solar power on long-term basis, seeking extension of time for completing their units, extensions were granted by the Commission, with Discoms failing to object to such extension sought by the private developers. Due to delay in execution of their units and extension of time given, the developers got the benefit of reduction in prices of solar panels, etc., without reducing the old higher tariffs. Moreover, no public hearings were held on those petitions. Had the Discoms cancelled those PPAs and gone in for fresh biddings or insisted on reduction of the old higher tariffs in tune with the then market trends, it would have benefited the</p>	<p>years period. Considering TSGENCO Capacity additions, TSDISCOMs limited the PSA (570 MW) for eight years only.</p> <p>Fixed charges in earlier PPA under Case-I bidding was increasing year-on-year (Escalation component present) whereas the Fixed Charge in this PPA under DBFOO would be decreasing by 2% year-on-year, which would be advantageous to TSDISCOMs. Therefore, Tariffs in the both PPAs are not comparable.</p> <p>i) At the time of formation of the Telangana State, there had been severe power crisis with load relief given to all categories of consumers including industries, which led to entering into an MoU between the State of Telangana and State of Chhattisgarh during the year 2014 wherein, Marwa (2x500 MW) capacity has been identified as dedicated source of supply to Telangana. Accordingly, a Power Purchase Agreement was entered by TSDISCOMs with CSPDCL on 22.09.2015 with the tariff to be determined by CSERC under Section-62 of the Electricity Act 2003.</p> <p>As per the National Tariff Policy, <i>“all future requirement of power should continue to be procured competitively by Distribution Licensees except in cases of expansion of existing projects or where there is a company owned or controlled by the State Government as an identified developer.....”</i></p> <p>As per the provisions stated above, the PPA was entered with Chhattisgarh Power Distribution Company Ltd by TSDISCOMs.</p>
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<p>consumers substantially. Extension of time was given to the private developers even considering delay in acquisition of land by them as a condition of force majeure! As a result, thousands of Crores of avoidable and additional burdens are being imposed on the consumers during the period of the PPAs of those units.</p> <p>d) The power supply agreements the TS Discoms had with NTPC for supply of 400 MW solar power, partly combined with bundled thermal power, had come up for public hearing before the Commission in the middle of 2021. The solar power is being purchased by NTPC Vidyut Vyapar Nigam Ltd., the trading wing of NTPC, from private developers and supplied to the Discoms @ Rs.4.66 per unit. Here, too, the Discoms did not try to negotiate reduction of price with NTPC in tune with the market trends, though there has been abnormal delay in commencing supply of power under the said PPAs or cancelling the PSAs. The terms and conditions in the PSAs with NTPC and SECI (for supply of solar power) are detrimental to the interests of the Discoms. As a result, hefty avoidable and additional burdens are being imposed on the consumers. We submitted elaborate objections and suggestions to the Commission but to no avail.</p> <p>e) Despite our detailed objections and suggestions on terms and conditions in the PPA the Discoms had with NTPC for purchase of power from Telangana STPP phase I, and the directions given by the earlier TSERC to the Discoms to negotiate with NTPC and modify several terms and conditions in the PPA, the Discoms failed to bring round NTPC and protect interests of the consumers.</p> <p>f) The TS Discoms have entered into a medium-term agreement with PTC India Ltd. for procurement of 550 MW for 6 months in a year, under the</p>	<p>Moreover, the appropriate State Regulatory Commission determines the tariff for the project as mandated by the Electricity Act, 2003.</p> <p>ii) CSERC has determined the tariff of Marwa vide order dated 07.07.2018, aggrieved by this order TSDISCOMs filed appeal No.391/2018 before APTEL, which is pending for adjudication. TSDISCOMs are paying provisional tariff of Rs.3.90/kWh for the supply of power from CSDISCOMs as per TSERC interim order dt.31.03.2017.</p> <p>Considering the various factors like delay in TS i-pass approvals, land acquisition and conversion issues, connectivity issues etc., Govt. of Telangana granted extension of time for completion of the Solar power.</p> <p>The Hon'ble TSERC after careful examination, considering the requirement of encouraging renewable sources of energy, accorded approval for extending the SCOD up to 30.06.2017. Further directed to file individual petitions for amending the PPAs in respect of penalties and re-fixation of tariff.</p> <p>As such, the revised SCOD for the individual projects were finalized by the Commission orders duly hearing the arguments of both parties (viz., DISCOMs &amp; Solar Power Developers). It is pertinent to mention that penalties were also levied for delay in achieving the COD and BGs were en-cashed in certain cases penalizing for delay in SCOD.</p> <p>It may be noted that Power Sale Agreements for procurement of 400 MW Solar power bundled with 200 MW Thermal power under JNNSM Phase-II State Specific Bundled Scheme were signed in 2016. In view of the delay in adoption of tariffs (discovered through competitive bidding by NTPC) by CERC, the issue pertaining to according consent to the PSAs entered with NTPC</p>
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	<p>MoP notified pilot scheme for aggregation of 2500 MW for three years through competitive bidding. The tariff has been Rs.4.29 per unit for the years 2020-21, 2021-22 and 2022-23. Under the same scheme, PTC is supply power to Kerala from this month @ Rs.3.26 per unit. I request the Hon'ble Commission to direct the Discoms to cancel their agreement with PTC for the year 2022-23. Surplus power is projected to be available for 2022-23 by the Discoms and additional power, if required, can be purchased from the market and through exchanges at a lesser price.</p>	<p>came up for public hearing during 2021. The power from these projects has been scheduled to TSDISCOMs from respective CODs of the plants from the year 2017. As such, the tariff from these projects cannot be compared with the latest tariffs. Also, before signing the Power Sale Agreements for the said procurement. TSDISCOMs, held series of discussions/ deliberations/negotiations with NTPC/SECI and were successful in modifying certain provisions of the PSA, safeguarding the interests of the end consumers. However, it may be noted that the majority provisions of PSA are in line with the guidelines issued by Govt. of India and are non-negotiable which cannot be modified as the Solar tariff was discovered through competitive bidding in the year 2016.</p> <p>Pursuant to the directions given by the Commission in the Interim Order, TSDISCOMsheld discussions with NTPC several times for incorporating the modifications in the Clauses of PPA of TSTPP. In reply, NTPC vide letter dated 14.10.2016 &amp;18.01.2019 have furnished their views. TSDISCOMs have communicated NTPC comments to the Commission. The Commission also addressed TSDISCOMs to take legal opinion on jurisdiction of appropriate commission for determination of tariff.</p> <p>In response, TSDISCOMs submitted the legal opinion to TSERC, wherein the counsel opined that the appropriate Commission to determine the tariff of NTPC's TnSTPS in question is the Central Commission under Section 79 of the Electricity Act, 2003</p> <p>And as per the direction of TSERC on 02.02.2021, Supplementary Agreement was entered between NTPC and TSDISCOMs on.</p>
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09.04.2021 to the extent of terms mutually agreed and submitted to Hon'ble TSERC.

By taking into consideration all the stake holders objections, Discoms and NTPC Replies, Hon'ble TSERC has issued consent to the PPA of Tn STPP Ph-I on 25.08.2021.

Pilot Scheme-1

In Pilot Scheme-I the tariff of Rs.4.24/Kwh (excluding Trading Margin of Rs.0.05/Kwh) and was discovered through Competitive Bidding conducted in the year 2018, Whereas, the supply of power from PTC to Kerala is under Pilot Scheme-II the tariff of Rs.3.26/Kwh excluding Trading Margin and was discovered through Competitive Bidding conducted in the year 2020.

Further, in Pilot Scheme-I, the Generator had agreed to supply power in a staggered manner of 6 months in a year as requested by TSDISCOMs i.e., for Rabi & Khariff seasons, whereas in Pilot Scheme-II minimum off-take is 85%, which is mandatory throughout the year continuously.

If power off-take is less than 85%, then penalty would be levied, whereas, in the pilot Scheme -I, the minimum power off take is 55% and if power off take is more than 55%, then utility would get 1% discount in tariff for every 5% incremental off-take beyond 55%.

		<p>The Terms &amp; conditions of Pilot Scheme-I &amp; II are different and detailed below:</p> <table border="1" data-bbox="1140 347 1871 706"> <thead> <tr> <th>Sl. No</th> <th>Parameter</th> <th>Pilot-I</th> <th>Pilot –II</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Minimum off take to avoid penalty</td> <td>55%/month for six months</td> <td>85%/Month</td> </tr> <tr> <td>2</td> <td>Tariff</td> <td>Fixed for 3 years</td> <td>Consists of base fixed and variable charges. Fixed remains constant, while escalation on variable charges will reflect 50% of variation in Whole Price Index (WPI).</td> </tr> </tbody> </table>	Sl. No	Parameter	Pilot-I	Pilot –II	1	Minimum off take to avoid penalty	55%/month for six months	85%/Month	2	Tariff	Fixed for 3 years	Consists of base fixed and variable charges. Fixed remains constant, while escalation on variable charges will reflect 50% of variation in Whole Price Index (WPI).
Sl. No	Parameter	Pilot-I	Pilot –II											
1	Minimum off take to avoid penalty	55%/month for six months	85%/Month											
2	Tariff	Fixed for 3 years	Consists of base fixed and variable charges. Fixed remains constant, while escalation on variable charges will reflect 50% of variation in Whole Price Index (WPI).											
35	<p>If PPAs are entered into indiscriminately to purchase unwarranted and high-cost power on long-term basis, unrelated to growing demand, giving a go-by to ideal power mix to the extent possible to suit fluctuating demand curve and consents given to the same by the SERC, it would lead to availability of substantial surplus power on a large scale, with resultant disastrous consequences, and imposing avoidable burdens on consumers of power on a large scale over the years, as experience in Andhra Pradesh has confirmed conclusively. Thousands of crores of Rupees are being claimed by AP Discoms under true-up every year as a result of entering into long-term PPAs for purchasing unwarranted and high-cost power, especially from solar and wind units and some private projects and consents given to the same by the then APERC, among other factors, during the regime of the Chandrababu Naidu Government. Despite having an abnormal surplus ranging from 8000 MU to 10,000 MU per annum and backing down the same, AP Discoms have been resorting to purchase of thousands of MU in the open market and through power exchanges every year, because the must-run renewable</p>	<p>Telangana Discoms have a dedicated wing (Telangana State Power Coordination Committee) to focus on all the power purchase related matters of the Discoms. TSPCC explores all the options of power purchase cost optimisation, while designing its power procurement planning strategies. Under the purview of TSPCC, Telangana Discoms have been procuring power via an adequate mix of Long term, Medium term and Short term arrangements, depending on the factors like ensuring satisfactory planning (for meeting demand), sourcing options availability, cost competitiveness etc. TS Discoms would reiterate that they are obligated to supply 24x7 power supply to its consumers (including agriculture), and are bound to contract with additional capacities to ensure no power interruptions in the state. All the PPAs entered by the Discoms are approved by the Hon'ble Commission.</p>												

	<p>energy they have been forced to purchase cannot meet peak demand, thereby increasing avoidable burdens on the consumers! This is in addition to tariff hikes and hefty subsidy being provided by the Government. Similar situation, with a difference in degree, is getting unfolded in Telangana also.</p>	
36	<p>In the annual retail supply tariff orders, TSERC used to include cost of power purchase based on the quantum required to be purchased for meeting demand in the financial year concerned. As such, costs of backing down surplus power and variations in additional purchases are not being covered in the annual revenue requirement of the Discoms as determined by the Commission. As a result, claims under true-up are being made by the Discoms for huge amounts. With the kind of deficiencies in the system of true-up, consumers are being burdened additionally, and Discoms are suffering financial losses to the extent their claims for true-up are not allowed by the Commission.</p>	
37	<p>When questionable decisions taken by the Discoms and proposals or petitions submitted to the Commission for its approval, may be at the behest of the GoTS, it is for the Commission to regulate them in a rational way and within the limitations of law and its regulations to prevent imposition of avoidable burdens on the consumers to the extent practicable. Unless the Commission regulates in a rational way, taking a holistic view, the tendency of the powers-that-be and the Discoms entering into long-term PPAs for purchase of unwarranted and high-cost power, etc., with questionable terms and conditions detrimental to larger consumer interest, regulations alone cannot undo the damage being done in the form of various problems that are arising. When regulatory diagnosis of the issues and problems is sound, first and foremost, preventive steps need to be taken during the regulatory process itself to avoid undesirable consequences that can and</p>	

	<p>should be avoided. It is in the interest of the Discoms and their consumers of power. Otherwise, it will not be possible to take curative steps in legal terms and the damage to larger consumer interest being done cannot be undone for several years.</p>	
38	<p>Aware as we are of the constraints and limitations of the Hon'ble Commission under the law, we request it to examine the above submissions, among others, and undo the damage being and will be caused to larger consumer interest to the extent possible within the limitations of its powers by disallowing what is impermissible and reduce the burdens proposed to be imposed on the consumers. In view of the limitations of the Commission, it is for the people at large to protect their interests by opposing the proposed hefty burdens and bringing pressure on the Governments at the Centre and in the State through concerted action.</p>	<p>This is under the purview of the Hon'ble Commission.</p>

**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by Sri M.Venugopal Rao, Senior Journalist & Convener, Centre for Power Studies, H.No.1-100mp/101 Monarch Prestige, Journalist's Colony, Serilingampally Mandal, Hyderabad -500032(set-2)**

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>The Discoms have requested the Hon'ble Commission to bring about an amendment to Regulation 4 of 2005 to put a mechanism for automatic pass through of power purchase cost adjustment in view of the enforcement of Electricity (Timely Recovery of Costs due to change in Law) Rules, 2021 by the Central Government dated 22.10.2021. They have submitted that the implementation of the rules by generating company or transmission licensee on monthly basis without provision for the distribution licensee to recover the same on monthly basis from the consumers shall have adverse impact on the financials of the Discoms leading to huge working capital costs and also affect the entire value chain of the power sector. Such an automatic pass through of impact in cost due to change in law by a formula is unwarranted. Terms and conditions in the PPA govern various aspects, as far as costs of purchase of power from the generators by the Discoms are concerned. Terms and conditions in the PPAs also contain a clause providing for applicability of change in law. Working out a formula for automatic pass through of the impact of change in law in terms of cost of power purchase may lead to divergent interpretations and disputes and bypasses regulatory examination of the veracity and permissibility of such impact. True-up claims under various uncontrollable factors can be made by the Discoms (and State transmission utility also) and the Hon'ble Commission considers the same after holding public hearings as per regulations applicable, that, too, with permissible carrying cost. Variations in costs of power purchase are also included under true-up claims. Moreover, the Discoms have every right to examine the impact of change in law as and when generators or transmission utility show the same in their monthly bills and contest its veracity and permissibility, if they consider it questionable. Therefore, we request the Hon'ble Commission to reject the proposals of the Discoms for amending the said Regulation.</p>	<p>The MOP order dated 09.11.2021, states the following -</p> <p><i>"5. Distribution companies face revenue constraints as the corresponding pass through of cost is not done regularly and timely in the retail tariff. Timely collection of revenue from consumer would ensure timely payment by the distribution company to the generating stations and coal companies.</i></p> <p><i>6. Section 62(4) of the Electricity Act provides that tariff or part of any tariff can be amended more frequently than once in any financial year in respect of any changes expressly permitted under the terms of any fuel surcharge formulae as may be specified.</i></p> <p><i>7.....The present mechanism leads to delays. It may be changed to provide for automatic pass through in tariff change in costs on account of change in law/ power purchase costs in accordance with a formula laid down by the State Regulatory Commissions.</i></p> <p><i>The Discoms will pass through the change in costs according to the said formula whenever the change in costs due to change in law/power purchase costs occur.</i></p> <p><i>Till a suitable formula is prescribed by the State Commissions the formula given in the Electricity (Timely Recovery of Costs due to Change in Law) Rules, 2021 may be adopted.</i></p> <p><i>9. The State Commissions are requested to place the above mechanism in operation with immediate effect."</i></p>



2	<p>The Discoms have proposed that persons operating captive power plants (CPPs) in parallel with T.S. grid have to pay grid support charges for FY 2022-23 on the difference between the capacity of CPP in kVA and the contracted maximum demand in kVA with licensee and all other sources of supply, at a rate equal to 50% of the prevailing demand charge for HT consumers. The proposal is justified, following the judgment of the Hon'ble Supreme Court in C.A.No.4569 of 2003 and batch passed on 29.11.2019, after a prolonged pendency for over 16 years, setting aside the orders of the High Court of Andhra Pradesh and upholding the order of APERC for levy of grid supporting charges from 2002-23 to 2008-09. I request the Hon'ble Commission that co-generation plants also be brought within the ambit of definition of plants operating parallel with TS grid by modifying the definition accordingly to avoid misinterpretation of certain co-generation plants that they are not a CPP. The cogeneration plant, though different from CPP so far as the operation is concerned, is not different on the aspect of operation in parallel with the grid. The levy of grid support charges needs to be reckoned from the financial year 2014-15 onwards, pursuant to the judgements of APTEL and the Supreme Court. When disputes pertaining to past period are settled, making applicability of the order with retrospective effect is common practice.</p>	<p>The definition of the captive power plant as mentioned at clause 3 in the Electricity Rules, 2005 issued by Ministry of Power, Government of India is reproduced as below:  <i>"No power plant shall qualify as a „captive generating plant“ under section 9 read with clause (8) of section 2 of the Act unless-</i> (a) <i>in case of a power plant</i>  —  (i) <i>not less than twenty six percent of the ownership is held by the captive user(s), and</i>  (ii) <i>not less than fifty one percent of the aggregate electricity generated in such plant, determined on an annual basis, is consumed for the captive use.</i>  <b>(b) in case of a generating station owned by a company formed as special purpose vehicle for such generating station, a unit or units of such generating station identified for captive use and not the entire generating station satisfy (s) the conditions contained in paragraphs (i) and (ii) of sub-clause (a) above."</b></p> <p>As read from the above the definition to consider a plant as captive there is no discrimination made based on the type of the fuel used and the processes involved. As such all the plants which satisfy the above conditions are treated as Captive power plants and charges will be levied accordingly as directed by the Honb'le Regulatory commission. Co-generation plants are also considered as captive power plants. Further modification of the term —Captive Power Plant (CPP) as —Captive Power Plant (CPP) and Co-generation plant with respect to</p>
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		levy of grid support charges is at the discretion of the Hon'ble Regulatory Commission.
3.	How much amount is reimbursed to the Discoms by TS Transco and TSLDC from the transmission and SLDC charges that are received/being received from the power exchanges in view of the short-term power purchases made by the Discoms either to meet the shortage/save overall power purchase costs, as long as the actual demand and capacity did not exceed the demand and capacity approved in the MYT order for transmission and SLDC cost, respectively, during the year 2021-22 so far? In light of the Discoms showing need for purchases from the market and short-term sources for the year 2022-23 also, the said amount to be reimbursed by Transco and SLDC to the Discoms would be substantial. We request the Hon'ble Commission to consider such amount to be reimbursed to the Discoms and adjust the same in their revenue requirement and revenue gap.	There are no Open Access charges (Transmission and SLDC charges) in respect of Short term purchases made by TSDISCOMs as it is covered under the total contracted capacity. Hence TSDISCOMs have not paid any Transmission and SLDC charges to TSTRansco for power purchases made through Power Exchanges for the FY 2021-22. Hence, reimbursement to TSDISCOMs by TSTRANSCO/TSSSLDC doesn't arise.
4	Imposition of demand/fixed charges on consumers as a part of the power bills they have to pay is irrational. Fixed charges are being covered in power purchase cost as far as generation is concerned. Fixed costs of transmission and distribution networks are being covered under the multi-year tariff orders being issued by the Commission and under true-up claims of the utilities. In view of the same, there is no justification in imposing demand/fixed charges separately on the consumers of power under the LT categories proposed by the Discoms. We request the Hon'ble Commission to reject the proposal of the Discoms for imposition of such fixed charges.	Levy of fixed/demand charges in the consumer tariffs is allowed as per the state's tariff regulations. The relevant extract is mentioned below – <i>"Proposal for retail sale of electricity to the consumers pertaining to its retail supply business and the details may include tariffs for each consumer category, slab-wise and voltage-wise. The tariffs proposed may also include energy charges, <b>fixed/demand charges</b> and minimum charges."</i> With respect to the introduction of fixed charges for LT Domestic consumers, TS Discoms have carried out the Tariff Comparison analysis across various states. It was found that most of the states are having fixed charges for LT Domestic category. Also, the Hon'ble Commission in the CSS Order for FY 2018-19 had directed the DISCOMs to submit the tariff proposals, giving due consideration to the guiding principles and recommendations of the MoP regarding tariff simplification and <b>rationalisation</b> .

		By way of introducing fixed charges for LT Domestic, TS Discoms have tried to rationalize the tariff structure.
5	<p>The Discoms have proposed to introduce the “facilitation charges of Rs.20,000/- per month or part thereof (at a rate of 5% increment every year) for providing open access facility under the head “other charges in HT” in order to meet the cost being incurred in providing the facility to open access users. The Discoms are already charging cross subsidy surcharge and additional surcharge from open access users, and additional surcharge is for meeting the costs of capacities of network stranded on account of open access. Therefore, there is no justification in introducing the proposed facilitation charges for open access users.</p> <p>However, the Discoms have a real problem when the open access consumers opt for supply of power under real time market (RTM), i.e., shifting from the Discoms to other suppliers of power to meet their requirement as and when they want, without giving any notice to the Discoms well in advance. Even while continuing to be the consumers of the Discoms, they can access RTM to optimize their power purchase cost. But the Discoms have an obligation to supply power to such consumers and make arrangements for the same. If there is no similar obligation on the part of such consumers to get supply of power from the Discoms as contracted, with freedom to opt for RTM as and when they want, without any intimation to the Discoms well in advance, it results in an iniquitous arrangement much to the disadvantage of the Discoms, with resultant avoidable additional burdens which will be imposed on their consumers of power under true-up later. If bulk consumers opt for RTM, by the time the time market obligations sheets on RTM are notified, the Discoms lose the opportunity to change their drawl schedules and they could be forced to under draw from ISTS during the periods of procurement of power by bulk consumers in RTM, with resultant burdens. It is a lopsided arrangement of freedom and benefits to bulk consumers and obligations and burdens to the Discoms. It needs to be remedied and a balance has to be maintained. The RTM is being availed by the Discoms for meeting any intraday shortfall that may arise on account of deviations from scheduled</p>	<p>TS Discoms have already mentioned the intention behind the introduction of the Facilitation Charges in their tariff proposal for FY 2022-23.</p> <p>TS Discoms would like to state that the consumer is getting benefit from the Open Access facility by getting cheaper power whereas the Discom is incurring excessive burden by rendering additional services in the form of O&amp;M cost i.e., exclusive team of employees cost, additional infrastructure cost, etc. Further, the Open Access users are paying Rs.5000/- per application as operating charges to SLDC only for monitoring their schedules of drawl/injection whereas the Discoms are not collecting any charges from the Open Access users even though lot of man hours are involved in granting Open Access, installation, testing of additional meters, MRI dumps collection, monitoring the injections/drawls of energy and working out the deviation settlements at various stages to avail Open access facility by the Open Access users.</p> <p>TS Discoms make a note of the suggestions made by the objector with regards to an alternative mechanism for enabling the Discoms to recover the avoidable additional burdens they have to bear on account of bulk consumers accessing power in the RTM, without giving any advance notice to the Discoms in a sufficient time frame.</p> <p>TS Discoms would abide by the instructions given by the Hon'ble Commission in this regard.</p>

	<p>sources, renewable energy intermittencies, weather changes affecting wind generation, real time load variations, etc. For the bulk consumers ensured as they are of supply of required power by the Discoms, there are no such problems or obligations. If there is shortage for power and Discoms impose power cuts, drawing of power by bulk consumers under RTM or other sources can be understood. Cross subsidy surcharge and additional surcharge cannot compensate the Discoms for the losses they incur due to sudden shifting of bulk consumers to RTM, when the Discoms are making necessary arrangements to ensure supply of power to them. Therefore, an alternative mechanism needs to be worked out and implemented enabling the Discoms to recover the avoidable additional burdens they have to bear on account of bulk consumers accessing power in the RTM, without any notice to the Discoms sufficiently in advance about their drawing power in the RTM.</p>	
6	<p>For purchasing power from the thermal power project (2x600 MW) of Singareni Collieries Company Ltd. as per the PPA dated 18.1.2016, the Discoms have shown substantial increase in variable costs from Rs.2.55 per unit in 2020-21 to Rs.2.99 per unit for 2022-23 as per the estimates of the project. What are the reasons for such increased estimates? At the same time, variable costs of CGSs are projected for 2022-23 as they were estimated for 2021-22 and the same are projected for thermal stations of TS Genco at reduced rates.</p>	<p>In the absence of VC estimates from CGS stations, TS Discoms have considered the VC projections for H2 FY 2021-22 and FY 2022-23, in line with the actual VC for H1 FY 2021-22.</p> <p>STPP is getting coal under Bridge linkage MoU with SCCL, whereas other projects are having linkage coal. From, October 2021 onwards, the Coal prices in India has increased, thus, the same has been projected by STPP for the FY 2022-23.</p>
7	<p>The fixed costs paid to the CGS thermal stations increased from Rs.1646 crore for 2021-22 to Rs.1862 crore for 2021-22 and are further revised to Rs.2652 crore for 2022-23 (with the addition of Telangana STPP phase I). The Discoms have submitted that, in the absence of CERC tariff order for the CGS stations, they have projected the fixed costs for 2022-23 in line with the arrived projections for 2021-22. What is the basis for increase in fixed costs by Rs.215 crore from 2020-21 to 2021-22 and justification for projecting the same rates for 2022-23?</p>	<p>TS Discoms have considered the FC projections for H2 FY 2021-22 in line with the actual FC for H1 FY 2021-22, for CGS thermal stations. The increase in FC in FY 2021-22 is predominantly due to increase in FC in H1 FY 22 over H1 FY 21.</p> <p>NNTPP has commissioned 500 MW unit on 10.02.2021, out of which Telangana State has been 31 MW allocated. Similarly, the Ministry of Power, government of India has allocated 50 MW of thermal Power to Telangana State with effect from</p>

		18.12.2021.Total 81 MW has been increased in the installed capacity for FY 2021-22.
8	While entering into PPA with Chattisgarh State Power Distribution Company Ltd. for supply of 1000 MW, the Discoms booked an additional transmission capacity for another 1000 MW. What has happened to the additional transmission capacity booked and what are the consequences thereof, in the absence of not getting additional 1000 MW capacity?	<p>The additional 1000 MW LTA capacity was relinquished, in view of significant RE capacity addition in Telangana State and commissioning of other state owned thermal projects.</p> <p>As there is adequate power due to significant RE capacity addition to fulfill RPPO and also due to commissioning of other state owned thermal projects in the state, No adverse effect i.e., shortage of power has been noticed due to absence of the additional 1000 MW power.</p>
9	For Thermal Power Tech Corporation of India Ltd. I and II, energy availability is shown with a PLF of 95 percent. The tariffs to be paid for purchasing power from the two units are shown as Rs.4.30 and Rs.4.73 per unit, respectively. As per the PPA the Discoms had with both the units, what are their threshold level PLFs? Is it obligatory on the part of the Discoms to take power exceeding the threshold levels of PLF and at such higher tariffs from these two units?	<p>TS Discoms would like to clarify that the energy availability for TPCIL have been considered at 95%, as per the estimates shared by TPCIL. The tariffs (VC, FC) for TPCIL-I and TPCIL-II have been considered based on the H1 actuals of FY 2021-22.</p> <p>The threshold limit for 269.45 MW PPA is 85% and for 570 MW PPA is 90%.</p> <p>Every month, TSDiscoms will Schedule/off-take power based on Merit Order of the total contracted power. Hence scheduling of power from these two units cannot be decided simply considering the individual PPA Tariff.</p>
10	The Discoms have proposed fixing of prepaid meters for all Government services existing under various categories. Instead of Government services, it should be service connections given to departments, undertakings and bodies of the Government. In principle, fixing of prepaid meters is objectionable. Since huge amounts are due from the departments of the Government and the Discoms are unable to collect such dues or disconnect such services, it seems that the Discoms have made this proposal. If Discoms are unable to disconnect services to the departments of the Government for	<p>Prepaid meters are being installed to various Government Offices/Departments including local bodies as per G.O. Ms No.1, ENERGY (BUDGET ) DEPARTMENT, Dated.03.01.2016. Further, the Ministry of Power, Gol had notified the timelines for replacement of existing meters with smart meters with prepayment feature, via the Gazette notification dated 17th August 2021, of which the following consumers (other than</p>

	<p>delay in payment of monthly bills within permissible period, obviously, under pressure from the authorities concerned, can the Discoms withstand such pressure even under the proposed system of prepaid meters? Or, it may be an attempt to introduce the system of prepaid meters with the Government as a prelude and later extend the same to other categories of consumers. It should be treated as an exception and not extended to other categories of consumers.</p> <p>As a better alternative, the Hon'ble Commission may direct the Discoms to disconnect service connections given to various wings of the Government, if they fail to pay dues of their monthly power consumption bills in time as is permissible under applicable terms of supply and as has been the standard practice in the case of other categories of consumers. There is no justification in seeking payment in advance for power to be supplied to, and consumed by, the consumers. For payment of power purchase under PPAs in force, the Discoms are getting sufficient grace period and discount, if such payments are made before the due date. If there is delay in paying monthly power bills by the consumers, the Discoms are collecting applicable penalties.</p>	<p>agriculture) are to be deployed with smart meters in prepayment mode by December 2023 –</p> <ul style="list-style-type: none"> <li>● Electrical divisions having &gt; 50% consumers in urban areas with AT&amp;C losses &gt; 15% in FY 2019-20</li> <li>● Other electrical divisions with AT&amp;C losses &gt; 25% in FY 2019-20</li> <li>● All Government offices at Block level and above</li> <li>● All Commercial, Industrial consumers</li> </ul> <p>TS Discoms have already installed 26,732 prepaid meters at the Govt. services. TS Discoms have proposed the fixing of prepaid meters for all the remaining Govt. services, in adherence to the abovementioned MOP notification.</p> <p>TS Discoms shall adhere to the further instructions given by the Hon'ble Commission</p>
11	<p>In response to the directive of the Hon'ble Commission that the Discoms shall replace 10% of existing agricultural pump sets with energy efficient pump sets as stipulated in UDAY MoU and submit a quarterly progress report on the same, SPDCL has maintained that there is no scheme for replacement of existing agricultural pump sets with star rated energy efficiency pump sets. NPDCL has maintained that, as this scheme involves requirement of capital expenditure, it is yet to initiate the scheme. However, NPDCL is insisting on installing of BEE, 5-star rated pumps for all new connections.</p> <p>The implication in the stance of the Discoms is that who should bear the expenditure for such measures and other energy efficiency and saving measures. Whenever any initiative is taken by the Discoms, at the behest of the GoI and GoTS, for implementation of energy efficiency and saving measures, it should be with the concurrence and willingness of the beneficiary consumers that they would bear the balance cost, after adjusting the financial assistance provided by the Governments. We request the</p>	<p>During the release of new agriculture connections, TS Discoms are ensuring the energy efficient pump sets. For the replacement of the existing pumps, it shall be done in a phased manner in coordination with the consumer.</p>

	<p>Hon'ble Commission to issue such specific directions to the Discoms, making it abundantly clear that such expenditure, fully or partly, should not be imposed on other consumers for whom no such schemes are implemented.</p>	
12	<p>The Discoms have shown arrears of consumers over Rs.50,000/- pending for over six months as on 30.9.2021 30.9.202 – Rs. 4893.16 crore by NPDCL and Rs.1645133785 lakhs (?) by SPDCL. SPDCL has to clarify whether the figure shown by it is a typographical error or correct. The lion's share of the accumulated dues is from HT consumers only. The number of HT consumers who have dues to the Discoms is 407 and amount due is Rs.4817.7 crore in the case of TSNPDCL. In the case of TSSPDCL, the number of HT consumers is 1319 and the amount due from them is Rs.6921.69 crore. What actions the Discoms have been taking to avert accumulation of arrears to such levels and collecting the arrears? SPDCL has shown that a sum of Rs.82.4066 crore is written off during 2020-21 and Rs.92.0854 crore during the first half of 2021-22 under bad debts. How much amount was written off by NPDCL under bad debts? Who is bearing the loss caused due to writing off of bad debts? Provision for bad debts should not be imposed on the consumers. It is nothing but penalising the consumers for the failures of commission and omission of the personnel of the Discoms, may be, due to unwarranted interference of the powers-that-be forcing the Discoms not to take necessary action to recover dues from the consumers, especially from influential HT consumers. The Discoms might be filing cases against defaulting consumers. But, lack of timely action leads to accumulation of dues. The reasons for such accumulation of dues need to be analysed and necessary plan of action be worked out and implemented by the Discoms to avert such accumulation. The Hon'ble Commission also may give directions, if required, to the Discoms on the course of action they should pursue to remove legal hurdles, if any. Accountability of the personnel also should be fixed for failure in taking timely action for recovery of dues from the consumers concerned and to avert accumulation of dues.</p>	<p>Most of the above Rs.50,000/- arrears outstanding on Govt. LIS and in respect of private services, Discom is taking timely action (such as disconnection of services) to avoid accumulation of arrears. Further, responsibility of timely disconnection of HT services was already fixed on the designated officers. And necessary action being initiated on the defaulting officers for their inaction.</p>

13	<p>TSNPDCL has shown that ex-gratia to the tune of Rs.17.63 crore is paid in 351 fatal accidents of human beings against 460 such accidents during the year 2020-21. In case of such accidents involving animals a sum of Rs.3.5559 crore was paid in 726 accidents against 974 accidents during the same period. Under 59 non-fatal accidents, no ex-gratia is paid. During the first half of 2021-22 also against 222 fatal accidents involving human beings, ex-gratia is paid in 123 cases only (Rs.6.26 crore) and in the case of animals, ex-gratia is paid in 314 cases (Rs.1.4444 crore) against 705 accidents. SPDCL has shown payment in 230, 225 and 178 human cases and in 546, 395 and 347 animal cases during 2018-19, 2019-20 and 2020-21, respectively, without showing the total number of accidents, both human and animal, that had taken place during the three years. Paying ex-gratia to victims of electrical accidents and collecting the same from consumers of power as a part and parcel of annual revenue requirement of the Discoms leaves no scope for fixing responsibility for the deficiencies and negligence which give rise such accidents. Causes of the electrical accidents need to be analysed, deficiencies in the network be identified and accountability of the personnel at various level be fixed for dereliction and human failure, if any, in taking safety measures, and preventive steps be taken promptly to prevent recurrence of such accidents. Reports submitted, if any, by the Discoms to the Hon'ble Commission should be made public.</p>	<p>Majority of the accidents are being taken place at the consumer fault.</p> <p>The details of human accidents for the last 4 years are as below</p> <p>Majority of the accidents are being taken place at the consumer fault.</p> <p>The details of human accidents for the last 4 years are as below:</p> <table border="1" data-bbox="1150 521 1934 935"> <thead> <tr> <th>Year</th> <th>No. of Human fatal accidents</th> <th>No. of accidents with consumer fault</th> <th>% of accidents with consumer fault</th> <th>No. of accidents with Dept. fault</th> <th>% of accidents with Dept. fault</th> </tr> </thead> <tbody> <tr> <td>2018-19</td> <td>415</td> <td>337</td> <td>81.2%</td> <td>78</td> <td>18.8%</td> </tr> <tr> <td>2019-20</td> <td>500</td> <td>419</td> <td>83.8%</td> <td>81</td> <td>16.2%</td> </tr> <tr> <td>2020-21</td> <td>449</td> <td>395</td> <td>88.0%</td> <td>54</td> <td>12.0%</td> </tr> <tr> <td>2021-22</td> <td>247</td> <td>213</td> <td>86.2%</td> <td>34</td> <td>13.8%</td> </tr> <tr> <td><b>Total</b></td> <td><b>1611</b></td> <td><b>1364</b></td> <td><b>84.66%</b></td> <td><b>247</b></td> <td><b>15.33%</b></td> </tr> </tbody> </table> <p>From the above, it is to submit that 84.66% of the accidents are taken place at the consumer side faults only and in even remaining 15.33% of cases also the majority of cases are due to natural calamities such as heavy gale and wind. The no. of cases in which the departmental staff responsible for the accidents and the action taken for the last 3 years is 37 no's. Rectification works of defective infrastructure as a part of safety measures, taken up in TSNPDCL under various schemes like DNRD, Palle Pragathi, Pattana Pragathi to prevent such recurrence of accidents are as follows:</p> <table border="1" data-bbox="1150 1300 1856 1404"> <thead> <tr> <th>Defectiveness</th> <th>Unit</th> <th>Qty rectified</th> </tr> </thead> <tbody> <tr> <td>Intermediate poles</td> <td>Nos.</td> <td>181352</td> </tr> <tr> <td>Bent/Leaned poles</td> <td>Nos.</td> <td>71502</td> </tr> </tbody> </table>	Year	No. of Human fatal accidents	No. of accidents with consumer fault	% of accidents with consumer fault	No. of accidents with Dept. fault	% of accidents with Dept. fault	2018-19	415	337	81.2%	78	18.8%	2019-20	500	419	83.8%	81	16.2%	2020-21	449	395	88.0%	54	12.0%	2021-22	247	213	86.2%	34	13.8%	<b>Total</b>	<b>1611</b>	<b>1364</b>	<b>84.66%</b>	<b>247</b>	<b>15.33%</b>	Defectiveness	Unit	Qty rectified	Intermediate poles	Nos.	181352	Bent/Leaned poles	Nos.	71502
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		Damaged poles	Nos.	68283
		Rusted poles	Nos.	7706
		Damaged stay wire/stud poles	Nos.	23419
		Damaged Conductors Rectified (KM)	KMs	2512
		Loose Spans Rectified (Nos.)	Nos.	133918.9
		Renovation of Defective Earthing of DTRs (Nos)	Nos.	19403
		DTR Plinth Raising (Nos.) (If Alarmingly Low Level)	Nos.	7735
		Low level Road Crossings Rectified (Nos)	Nos.	11498
14	<p>The Discoms have saddled themselves, as well as their consumers, with high cost bundled power under JNNSM phase I - Rs.10.69 per unit of solar power and Rs.4.62 per unit of thermal power, as projected for the year 2022-23. Under NTPC bundled power also, the Discoms have saddled themselves with high cost power - Rs.4.73 per unit for solar power and Rs.3.95 per unit for thermal power, as projected for the year 2022-23. They have shown the weighted average rate for solar power as Rs.5.69 per unit. Compared to Rs.2.83 per unit under NTPC CPSU 1692 MW and Rs.2.78 per unit under SECI 400 MW, which are also higher compared to the tariffs discovered through competitive biddings elsewhere in the country. For what purpose the Discoms have entered into purchase of so-called bundled power under which high cost solar, as well as thermal, power will have to be purchased by them on long-term basis? The cost of thermal power under bundled power arrangement is more than the variable cost of the thermal power units of TS Genco. Though supplied by NTPC or its trading wing and SECI, the solar power is being purchased by them from private developers. The imprudent decisions of the powers-that-be in forcing the Discoms to enter into PPAs to purchase such high-cost solar and thermal power continue to impose avoidable hefty burdens on consumers of the Discoms for a long period. In the name of bundled power, the Discoms have been tricked by NTPC to bear the overburden of both solar and thermal power on long-term basis and consents given to such tricky PPAs by the ERC concerned facilitated the same.</p>	<p>The Government with a view to encourage generation of electricity from renewable sources of energy issued various solar policies and schemes to have achieved the targeted capacity of 450GW by 2030 and to increase the share of installed capacity from RE sources to 40% by 2030. Accordingly, all procurements made from renewable sources so far under Long term basis were made under a transparent and competitive manner in the interest of consumers of Discoms and fulfillment of power purchase obligations fixed by state ERC and MoP. Further, TSDiscoms have made its best efforts at the time of execution of PPAs with Generators to purchase power at the best price, i.e., most competitive price available, that is, least price discovered under the competitive bidding for procurement of power from RE Generators in the bidding. Due to advancement of technology and efficiency, the capital cost of solar PV and connected equipment were reduced year on year thereby the tariff discovered through competitive bidding are in down trend. The tariff discovered in 2010 cannot be compared with the tariff discovered in the year 2020. The projects awarded in the</p>		

	<p>Can the powers-that-be, the Discoms and ERC undo the injustice being done to the consumers on account of such questionable transactions by cancelling the high-cost PPAs?</p>	<p>year 2020 have time till 2022 to complete the project at reduced capital cost. It is not appropriate to compare the rates arrived in Telangana in 2010 to the rates obtained in 2020. Had the DISCOMs not entered PPAs on long term, the Discom should have procured the power at higher cost.</p> <p>As per the doctrine of contracts, the sanctity of the PPAs should be preserved, it was also noted that the terms of PPAs did not permit unilateral alteration or alteration at behest of other party. Finally, capacity addition decisions involving renewable power purchases (solar, wind, etc.) can be made well in advance when such capacity is needed, as power generation from renewable sources will take more gestation periods for generation of energy from renewable resources.</p>
15	<p>While SPDCL has projected overall growth of sales from 42,915.95 MU in 2021-22 to 48,822.08 MU for 2022-23, NPDCL has projected the growth from 19949.46 MU in 2021-22 to 25904.66 MU for 2022-23. While for LT agriculture sales are projected to come down marginally, for HT agriculture and irrigation, mainly lift irrigation schemes, NPDCL has projected sales of 9014.17 MU which is more by 6073.31 MU than the sales during 2021-22 and SPDCL has projected 5248.49 MU which is more by 3485.81 MU. In other words, for HT agriculture and irrigation alone, an additional sale of 9559.12 MU, i.e., a growth rate of about 204 per cent over the sales during 2021-22. Going by the record and general trend of the department of irrigation in implementation of projects, with longer delays and abnormal increases in capital costs and interest during construction, the projected increases in sales to HT agriculture and irrigation by the Discoms for the year 2022-23 may turn out to be unrealistic and inflated. Needless to say, in such a situation, capacities of transmission and distribution networks created for meeting the projected requirements of the HT agriculture and irrigation would remain</p>	<p>TS Discoms are expecting that the sales of agriculture category will decrease with upcoming LIS Loads as these two are complementary things, i.e. Increase in LIS consumption would provide easy accessibility for water and help agriculture consumers to pump the water by consuming lesser amount of energy.</p> <p>Projecting LIS sales consist of high amount of unpredictability, availability of water is an important factor. However, LIS sales are projected by considering the current pumping stations loads on Krishna &amp; Godavari river and any upcoming additional loads. These loads are further considered to be operating only at a 60% load factor. Thus, if all conditions work fine LIS loads would generate the projected LIS Sales consumption and would also affect the agriculture sales causing it to decrease marginally. Thus, TS Discoms have considered a past reference i.e. CAGR while projecting sales for LT Agriculture, however for HT LIS</p>

	<p>stranded and availability of surplus power would increase, with attendant avoidable burdens. The Discoms have not given details of which LIS would be commissioned and how much power is required for its pumps to be operated during 2022-23. Needless less to say, operation of LIS pumps depends on availability of water. Therefore, I request the Hon'ble Commission to provide the details of LIS that would be commissioned and operated during 2022-23 and power required LIS-wise and make a realistic assessment of requirement and sales of power.</p>	<p>projections taking past sales as a reference could cause under projection of LIS sales. Hence, TS Discoms view that taking current LIS loads and additional LIS load at relevant load factors, could be a better approach for predicting HT LIS sales. TS Discoms have considered the HT LIS sales as per the inputs provided by the LIS ICAD department.</p> <p>As part of the Additional Information, TS Discoms have submitted detailed information about LIS in terms of scheme-wise and voltage- wise consumption for FY2022-23. The objector may refer to the abovementioned information.</p>
16	<p>The Hon'ble Commission rightly directed the Discoms to furnish the subsidy amount borne by the State Government, in the consumer bills of the applicable LT 1 domestic category consumers. It made it clear that the per unit subsidy amount to be furnished in the consumer bills should be the difference of the Cos (in Rs./kwh) determined by the Commission for LT 1 category and the average tariff (in Rs./kwh) paid by the respective consumer. We request the Hon'ble Commission to show in the retail supply tariff order for 2022-23 how much cross subsidy from which categories of consumers and Government's subsidy is being provided to which categories of consumers. For the year 2022-23, while TSSPDCL has projected a requirement of 1181.74 MU with a cost of service of Rs.9.20 per unit for LT agriculture, TSNPDCL has projected a requirement of 7525.14 MU with a cost of service of Rs.8.96 per unit. With the policy of the GoAP of free supply of power to LT agriculture throughout the day, after adjusting cross subsidy as decided by the Commission, the Government has to provide required subsidy to LT agriculture and other categories of consumers of its choice. I request the Hon'ble Commission to get a commitment of GoTS to provide subsidy it agrees to provide to categories of consumers of its choice in a legally binding manner. I request the Hon'ble Commission not to consider any assurance of the Government that it would consider at appropriate time to provide any balance of the subsidy required, but to determine tariffs after adjusting the actual amount the Government agrees to provide to categories of consumers</p>	<p>As per the current ambit of the TSERC regulations in place the Hon'ble commission computes the Full cost recovery tariff schedule and Retails Supply tariff schedule for all consumer categories after considering the subsidy commitment by the GoTS and cross subsidies across various consumer categories. TS Discoms shall abide by the directions given by the Hon'ble Commission.</p>

	<p>of its choice. The stand that the Discoms can approach the Commission, if the GoTS does not provide the subsidy amount it agreed to, for appropriate consideration or that, in such an eventuality, the Discoms should collect the tariffs at full cost worked out by the Commission from the subsidized consumers concerned is unwarranted. It would be tantamount to indicating to or encouraging the GoTS to flout with impunity its commitment on providing subsidy as it conveys in its written communication to the Commission.</p>	
17	<p>The Discoms and other power utilities of the GoTS have been developing and maintaining vast systems of network, etc., to improve their performance and service to the consumers in the State, with the efforts of the engineers and workers. As a matter of principle and commitment, we want the public sector utilities to be strengthened and necessary support be extended to them by the Governments to enable them to provide better services to the consumers. Our constructive criticism and positive suggestions are made with this approach only.</p>	<p>TS Discoms make a note of this suggestion made by the objector.</p>
18	<p>With adequate time given by the Hon'ble Commission to the Discoms to send their responses to objections and suggestions, we hope that they would send their responses to our submissions, with relevant information and data, well in time to enable us to study the same and make further submissions during the public hearings scheduled to be commenced from 21.2.2022. I request the Hon'ble Commission to consider the above-mentioned submissions and my earlier submissions, among others, and take appropriate decisions before issuing the retail supply tariff order for the year 2022-23.</p>	<p>TS Discoms make a note of this suggestion made by the objector, and will reply to the objections in a timely manner.</p>

**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by Telangana Ferro Alloys Producers Association, #6-2-913/914,3rd Floor, Progressive Towers, Khiratabad,Hyderabad-500004 (set-1)**

S.No	Summary of Objections / Suggestions	Response of the Licensee
1	At the outset, we wish to bring to your kind notice that the Government of Telangana has devised a Sick Industry Revival Scheme for the Ferro Alloy industry in the year 2018 and caused for the re-commencing of Ferro Alloys manufacturing operations.	No comments
2	There are 7 Ferro Alloy manufacturing units in the State of Telangana are high power intensive in nature. These units contributing huge GST contribution @ 18% in addition to generation of wealth and providing huge employment potential in the rural areas. Earlier, the Discoms have imposed R&C measures in the years 2012 to 2014, and most of the Ferro Alloy units were closed especially in Telangana due to power shortage in the erstwhile State of united Andhra Pradesh.	TS Discoms wants to mention that at the time of formation of Telangana state consumers were facing the problem of Power deficit (~7%, 2014). However due to continuous efforts of TS Govt & TS Discoms to provide quality & reliable supply to the consumers currently our state has moved to power sufficient state where do not have any power deficit (0%, Dec 2021).
3	The Ferro Alloy Industry is highly power intensive and Electricity constitutes about 60% of the manufacturing cost. Keeping in view of the background, the Electricity Board has introduced a new category in the year 2002 viz., HT for power intensive industry. Currently the tariffs are having a basic price of Rs.5 per unit excluding electricity duty of 6 paisa per unit for the Financial Year 2021-22.	TS Discoms have carried out rigorous analysis on tariffs for various categories across states in India. It was found that tariff for HT Ind category across voltage levels in all other major states in India like Gujarat, Uttar Pradesh, Madhya Pradesh, Rajashtan, Punjab, Maharashtra, Delhi, West Bengal etc. are higher as compared to HT Ind. Tariff in Telanagana. In addition to that it is found that there was no separate bifurcation of ferro alloys as a separate category. Infact all the industries are billed under same HT Ind. Tariff.
4	With great difficulty the Ferro Alloy companies are surviving and running hand to mouth due to abundant imports from China. The companies are also facing severe competitions from the low power cost states in India and in addition there are also supplies from Bhutan and from other countries where power is available at cheaper cost. We would like to mention here that the proposed new tariff proposals for	Thus, TS Discoms have proposed ferro alloys tariff in line with the HT Ind. Tariff. TS Discoms have also carried out analysis to understand the other power intensive industries like Steel Industries, Cement Industries etc. These industries are also billed under same HT Ind. Tariff in all states across India.

	the year 2022-23 for Ferro Alloy industry which is highly power intensive in nature, the proposed tariff is abnormally high and making the industry not competitive and hence unviable.	TS Discom believe that issues like imports from China, Bhutan are the internal matters of the particular industry and can be solved by improving operational efficiencies. As already explain above TS Dicoms are providing power at relatively cheaper rate to ferro alloys category if compared to other states. However, even after increasing the proposed tariff for ferro alloys categories (in line with HT Ind.) the said tariff is less than other major states across India as explained above.										
5	The kind of increase in tariffs proposed and introduction of Demand Charges unilaterally, will only result in paving way for the permanent closure and extinguishing of Ferro Alloy industry from our Telangana State which is contributing huge employment opportunity in addition to generation of wealth.	TS Discoms have also carried out analysis to understand the other power intensive industries like Steel Industries, Cement Industries etc. These industries are also billed under same HT Ind. Tariff in all states across India. Thus billing ferro alloys industries in line with other HT Industries is justifiable.										
6	In the past, with lot of representations and deliberations with the Discoms, the category called HT1B was introduced in order to facilitate the survival of Ferro Alloys manufacturing units and making these units competitive with the neighboring states. This category was introduced after the Ferro Alloys manufacturing units have agreed to sacrifice the power allocations from NTPC directly. In the proposed new tariffs for the year 2022-23 surprisingly the HT1B category is removed and the very purpose for which this power intensive category was introduced for their survival and will be defeated.	TS Discoms have carried out rigorous analysis on tariffs for various categories across states in India. It was found that tariff for HT Ind. category across voltage levels in all other major states in India like Gujarat, Uttar Pradesh, Madhya Pradesh, Rajasthan, Punjab, Maharashtra, Delhi, West Bengal etc. are higher as compared to HT Ind. Tariff in Telanagana.  In addition to that it is found that there was no separate bifurcation of Ferro alloys as a separate category. In fact, all the industries are billed under same HT Ind. Tariff. Thus, TS Discoms have proposed Ferro alloys tariff in line with the HT Ind. Tariff.										
7	For your immediate reference, we are submitting the prevailing tariffs of Andhra Pradesh along with the proposed HT1B tariff schedules for the year 2022-23 with comparison to Telangana State Discoms proposals.	TS Discoms have also carried out analysis to understand the other power intensive industries like Steel Industries, Cement Industries etc. These industries are also billed under same HT Ind. Tariff in all states across India. As already explain above TS Dicoms are providing power at relatively cheaper rate to Ferro alloys category if compared to other states. However, even after increasing the proposed tariff for Ferro alloys categories (in line										
	<table border="1"> <thead> <tr> <th>S.No.</th> <th>State - 132 KV Power Supply</th> <th>Prevailing tariff in Rs. /unit</th> <th>Proposed tariff for 2022-23</th> <th>Variance Rs. /Unit</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	S.No.	State - 132 KV Power Supply	Prevailing tariff in Rs. /unit	Proposed tariff for 2022-23	Variance Rs. /Unit						
S.No.	State - 132 KV Power Supply	Prevailing tariff in Rs. /unit	Proposed tariff for 2022-23	Variance Rs. /Unit								

	1.	Andhra Pradesh	4.95	4.95	0.00	with HT Ind.) the said tariff is less than other major states across India as explained above.
	2.	Telangana	5.00* Plus Demand Charges.*	6.65	+1.65	
	*Introduction of Demand Charges @ Rs.475 per KVA					
8	<p>It may be seen from the above table that apart from the above phenomenal increase of 33% in unit price, we are also surprised to note for the first time Discoms have newly introduced Demand Charges for HT1B category. The Discoms have treated power intensive category on par with other general industries for introduction of the Demand Charges of Rs.475 per KVA, costing about Rs. 1.00 per unit additionally burdening on account of introducing Demand Charges for HT1B category. This is totally irrational move and totally unwarranted in comparison with the State of Andhra Pradesh and other neighboring States.</p>					<p>TS Discoms have carried out rigorous analysis on tariffs for various categories across states in India. It was found that tariff for HT Ind. category across voltage levels in all other major states in India like Gujarat, Uttar Pradesh, Madhya Pradesh, Rajasthan, Punjab, Maharashtra, Delhi, West Bengal etc. are higher as compared to HT Ind. Tariff in Telangana. In addition to that it is found that there was no separate bifurcation of Ferro alloys as a separate category. In fact, all the industries are billed under same HT Ind. Tariff. TS Discoms have considered Ferro alloys category in line with the HT Ind. Category, thus the tariff applicable for Ferro alloys Category is same as applicable for HT Ind.</p>
9	<p>We would like to highlight that the Ferro Alloy industry provides continuous 24 hour standard load to the network which helps system integration. We consume minimum 610 units and above per KVA with the plant unity power factor is 99% and above. No industry other than Ferro Alloy industry can achieve this load factor. This is the reason, the Discoms have earlier incorporated power intensive category viz., HT1B.</p>					No comments
10	<p>It can be observed from the above, with additional increase in cost per unit of Rs.1.65 paise coupled with introduction of Rs.0.75 paise on account of Demand Charges, the proposed increase will amount to Rs.2.40 paise per unit which is a very high order for a power intensive category.</p>					<p>As already explained TS Discoms have made Ferro alloys category tariff in line with HT Ind. All power intensive industries in all other major states in India are billed under HT Ind. Category. Tariff for HT Ind. category across voltage levels in all other major states in India like Gujarat, Uttar Pradesh, Madhya Pradesh, Rajasthan, Punjab, Maharashtra, Delhi, West Bengal etc. are higher as compared to HT Ind. Tariff in Telanagana.</p>

	There will be no level playing field for the Ferro Alloy industry of Telangana with neighboring States and dumping imports from China to continue manufacturing operations.	TS Dicoms are providing power at relatively cheaper rate to Ferro alloys category if compared to other states. However, even after increasing the proposed tariff for Ferro alloys categories (in line with HT Ind.) the said tariff is less than other major states across India as explained above.
11	The proposed tariff increase is irrational in nature and introduction of Demand Charges for HT is totally un-justifiable for power intensive category which will lead to disastrous affect leading to permanent closure of the industry. While on the subject, the Government of Telangana has caused for reopening the Ferro Alloy Industry by providing certain incentives including payment of dues in instalments in 2018.	
12	Earlier there was no Demand Charges for high power intensive units as because these industries consume power without any transmission loss, whereas the other industries the transmission losses are very high and which is not good to the Discoms. The advantage of no transmission loss has not been considered while submitting the revised proposals both for increase for tariff and as well as additional Demand Charges.	TS Discoms have duly considered the effect of saving due to transmission losses. This is the reason Energy charges for Ferro alloy and HT Ind. are categorized according to their voltage levels, where tariffs gets cheaper when drawn at higher voltage levels.
13	The industries have not at all recovered from the Covid-19 pandemic and the various mutants of Covid-19 viz., Delta and Omicron is disturbing the economic portfolio of the State as well as the Centre. In these circumstances, the State Government with the objective of promoting industries for the purpose of revenue generation for themselves and also to augment the employment opportunities for the rural people.	TS Discoms agree that COVID-19 has significantly impacted the economy and wellbeing of our state and nation. Having recognized that, TS Discoms had taken various steps to provide relief to its consumers, some of which are mentioned below – <ul style="list-style-type: none"> <li>● Meter reading were suspended with enforcement of national level lockdown in March 2020. Meter readings remained suspended till May and normal meter reading commenced from June 2020</li> <li>● Controlling cost: Project work were reduced to minimum possible only in emergency cases</li> <li>● Provisional Billing to LT consumers for April 2020</li> <li>● Fixed Charges for Industries deferred till 31.05.2020 without any penalty and interest</li> </ul>



		<ul style="list-style-type: none"> <li>● 1% Rebate for HT Industries for payment within Due date (till 31.05.2020)</li> <li>● Deration of Contracted Load: A consumer can avail deration of the contracted load irrespective of the criteria of completion of minimum period of the agreement as stipulated in GTCS. Existing 3 months' notice period reduced to 30 days.</li> </ul> <p>Having said that, the last tariff hike in the state was approved by the Hon'ble Commission in FY 2016-17. While, it has been five years now since the last tariff hike, but in the said duration, all the costs incurred by TS Discoms in terms of Power purchase cost, Transmission and Network cost etc. have increased significantly, leading to a constantly increasing revenue gap.</p> <p>Hence, TS Discoms believe that the proposed tariff hike is inevitable and justified to improve its financial condition and better customer service and accordingly request the Hon'ble Commission to approve the same after due regulatory proceedings.</p>
14	<p>It is Government's responsibility to protect the promoters of core industry &amp; entrepreneurs who have invested huge amount of capital &amp; time for setting up of these power intensive units viz., Ferro Alloys in Telangana. Since we have to come up with the competition of global market in supplying Ferro Silicon, the cost of the power supplied by Discoms should be at a reasonable price.</p>	<p>TS Discoms shall abide by the directions given by the Hon'ble Commission, and the Govt. of Telangana.</p>
15	<p>For development of industries and encourage industries, as a matter of fact and core object Govt. of TS / TS Transco / Discoms should provide adequate, reliable and cost-effective power supply. The new tariff proposals should not have done away with the existing HT category and introduce the additional burden to the consumer with Demand Charges. TSERC should consider our request to encourage industries growth in the interest of our State /Country.</p>	

**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by Telangana Ferro Alloys Producers Association, #6-2-913/914,3rd Floor, Progressive Towers, Khiratabad, Hyderabad-500004 (set-2)**

S.No	Summary of Objections / Suggestions	Response of the Licensee
1	As narrated earlier, this category is high power intensive units and substantial part, nearer to 65% of Manufacture cost is power charges. Most of the units in general were closed for quite long time unable to bear with power costs, besides competition from other states, where power charges are less.	TS Discoms believe that issues like competitions from other state can be overcome by improving the operational efficiency.
2	It is submitted after getting few decisions of the Government of Telangana to this category of power intensive projects, allowing them to pay dues in instalments without interest has given hope for recommencement of operations of Ferro Alloys industry. This power intensive category Ferro Alloy industry is now revived. However, the main grievance to exempt power intensive these category (Ferro alloys industry) from the liability of minimum demand charges is still pending before the Hon'ble Commission, while in AP State such liability is omitted considering the fact that financial viability of these projects are not permissible unlike others category of industries.	<p>It is pertinent to mention that the Discoms in India are also struggling to improve their financial health. Having said that, the last tariff hike in the state was approved by the Hon'ble Commission in FY 2016-17. While, it has been five years now since the last tariff hike, but in the said duration, all the costs incurred by TS Discoms in terms of Power purchase cost, Transmission and Network cost etc. have increased significantly, leading to a constantly increasing revenue gap.</p> <p>Hence, TS Discoms believe that the proposed tariff hike is inevitable and justified to improve its financial condition and better customer service and accordingly request the Hon'ble Commission to approve the same after due regulatory proceedings.</p> <p>TS Discoms are providing power at relatively cheaper rate to Ferro alloys category if compared to other states. However, even after increasing the proposed tariff for Ferro alloys categories (in line with HT Ind.) the said tariff is less than other major states across India.</p>
3	It is submitted that still there are six units of this power intensive category which could not pay the pending dues even after	

	granting instalments, because of unfavorable market conditions for Ferro Alloys industry projects. This objection is submitted keeping in view of two separate orders of TSSPDCL, concerned to all six Ferro Alloy units (power intensive) category in one order dated 17 .09 .2018 and the other order dated 04.10.2021 in respect of M/s VBC Ferro alloys Limited for repayment of all existing liabilities shown in the above order are for substantial amount of money, is in the process of Clearing old FSA dues. Copies of these two orders are enclosed for kind reference of Regulatory Commission.	TS Discoms have carried out rigorous analysis on tariffs for various categories across states in India. It was found that tariff for HT Ind. category across voltage levels in all other major states in India like Gujarat, Uttar Pradesh, Madhya Pradesh, Rajasthan, Punjab, Maharashtra, Delhi, West Bengal etc. are higher as compared to HT Ind. Tariff in Telangana.
4	The following aspects and additional objections are highlighted as most of the Ferro Alloy units are only connected to 132 KV, the same is submitted in respect of such class of 132 KV out of Ferro Alloys Manufacturing Industries category	In addition to that it is found that there was no separate bifurcation of Ferro alloys as a separate category. In fact, all the industries are billed under same HT Ind. Tariff.
5	Earlier this Honble Commission, considering the fact of high power intensive, this category was specifically carved out of HT 1(A) general industry as HT- 1(B) and specific tariff was determined comparatively lesser than general industrial category	Thus, TS Discoms have proposed Ferro alloys tariff in line with the HT Ind. Tariff.
6	In respect of the Ferro Alloys Category of L32 KV class, it was Rs.4.80 per unit towards energz charges for the financial year 2015-16 and revised the same to Rs.5.00 per unit subsequently but without any demand charges. Whereas the per unit charges for general industry was fixed at Rs.5.60 besides Rs.3.90 ps towards demand charges	TS Discoms have also carried out analysis to understand the other power intensive industries like Steel Industries, Cement Industries etc. These industries are also billed under same HT Ind. Tariff in all states across India.
7	Now, in the New ARR proposals it is contemplated to increase by Rs.1.00 to general industries to make it Rs.6.60, but for Ferro	

	<p>Alloys, it is proposed to increase by Rs.1.60 per unit to make it Rs. 6.60 pS, besides imposing Rs.4.50 for KVA per month towards demand charges. Thus, increase of unit charges in the New proposal is arbitrary, phenomenal and without any justification of what so ever</p>	<p>TS Discoms believe that issues like imports from China, Bhutan are the internal matters of the particular industry and can be solved by improving operational efficiencies.</p>
8	<p>Further, as per the A.R.R submitted now, at page 227 and 228 of A.R.R, the cost to service Model is given. As per the same cost to service for this category is shown as Rs.4.57, and categorically stated there are no commercial losses for this category of industries. Whereas, the general industries of same voltage 132 KV, the cost to service is Rs.5.29. Although, there is difference of Rs.0.72 paisa, in cost to service, the demand charges &amp; energz charges to Ferro Alloys is same as that of general industry category. As such, proposal is arbitrary without any rational basis.</p>	<p>As already explain above TS Dicoms are providing power at relatively cheaper rate to Ferro alloys category if compared to other states. However, even after increasing the proposed tariff for Ferro alloys categories (in line with HT Ind.) the said tariff is less than other major states across India as explained above.</p>
9	<p>Further, without any justification, the Discom has proposed to delete the earlier carved out as category HT- 1(B) to this Ferro Alloys Units being high power intensive and now merged with H.T 1-A general industry. Therefore, the said proposal is arbitrary and on the face of it, and deserves to be rejected</p>	
10	<p>With regard to new proposed demand charges for the Ferro Alloys category is Rs.475 per I(V per month although hitherto there was no such demand charges at all to this category. Whereas in respect of General industly, it was only Rs.0.85 increase in the component of demand charges. The said demand charges of Rs.475 per I(V per month would translate to Rs.0.75 per unit of</p>	<p>TS Discoms shall abide by the order of Hon'ble TSERC</p>

	power consumed by these units which is very high and only will increase cost of power to Ferro alloys industry	
11	For A11 the above mentioned reasons, it is prayed not to impose new component of demand charges and also to maintain earlier tariff Rs. 5 per unit in order to enable the Industry to repay the existing installments and also to survive and compete with neighboring states.	No comments

**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by Sri M.Thimma Reddy, Convenor, People’s Monitoring Group on Electricity Regulation, H.No. 3-4-107/1, (Plot No.39), Radha Krishna Nagar, Attapur, Hyderabad-500048 & Sri B.Ayodhya Reddy, Convenor, Spokes Person & Co Ordinator, Telangana Pradesh Congress Committee Flat-301,(Plot No.71),Krushi Enclave, Aditya Nagar, Near Vijaya School, Kapra, ECIL Post, Hyderabad-500062**

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>TSDISCOMs estimated power requirement during the ensuing FY 2022-23 to be 84, 222 MU. This is 16.69% higher than power requirement during the current FY 2021-22. TSSPDCL in its filing projected electricity consumption to increase by 13.76% during the ensuing FY while it is expected to increase by 8.59% during the current FY. In the absence of ARR and tariff proposal filings during the last three years it is difficult to assess consumption projections made by TSDISCOMs for the ensuing year. The high electricity consumption growth rates projected for the ensuing year do not appear to be supported by historical experience and need to be moderated.</p>	<p>TS Discoms would like to state that the historical sales have been specified in the Form 3 of the RSF formats. This includes the category-wise actual sales for FY 19, FY 20, FY 21, estimated sales for FY 22 (H1 actuals, H2 projections) and projected sales for FY 23. The detailed category-wise justifications have also been elaborated in the write-ups. As mentioned in the write-up submitted, the major reason for such a significant increase in the energy requirement of FY 23 over FY 22, is due to the expected additional loads of LIS.</p>
2	<p>According to TSDISCOMs’ estimates LT domestic consumers will be using 14,143 MU during the ensuing year. LT domestic consumers will account for 16.79% of electricity requirement during the ensuing year. Both the DISCOMs assumed that electricity consumption by LT domestic consumers would increase by 7% during ensuing year while electricity consumption by this consumer category increased by less than 5% during the current year.</p> <p>During FYs 2020-21 and 2021-22 electricity consumption by domestic consumers increased in the background of COVID-19 restrictions, closure of offices and schools and spread of work from home and online classes – people spent more time in their houses. As COVID-19 restrictions are being brought down step by step with some of the offices opening and physical classes for senior students starting the same level of consumption by domestic consumers as during the last two years cannot be expected. In this background assumption of 7% growth rate in electricity consumption by LT</p>	<p>TS Discoms would like to state that sales projections for FY 2022-23 have been made by calculating the CAGR for the respective Discoms for over a period from 1 year CAGR to 5 year CAGR. Further an appropriate CAGR is considered for predicting sales for FY2022-23. Projecting sales only on the basis of last year's sales growth would not give a perfect picture. Thus CAGR methodology is followed which takes care of the historical trend.</p> <p>TS Discoms agree that due to covid -19 restrictions more people were spending their time in their houses, and thus have considered the growth rate for FY 2022-23 based on the CAGR methodology. In fact the 5 year CAGR (2016-17 to 2021-22) for TS Discoms is ~ 6% for Domestic category thus the projections made by TS Discoms for FY 2022-23 is justifiable.</p>

	domestic consumers appears to be on the higher side and the same need to be brought down.													
3	<p>TSDISCOMs estimated that agriculture pump sets would be consuming 18,707 MU of electricity during the ensuing year accounting for 22.21% of electricity requirement in the state. In the absence of meters to the agriculture services estimation of electricity consumption by agriculture pump sets has become contentious issue. While NPDCL in its filing claimed to have used ISI Methodology approved by the Commission SPDCL did not make clear on what basis it has arrived at the electricity consumption by agriculture pump sets. Both the DISCOMs indicated release of new services as one of the reasons for increased electricity consumption by these services. But the following information provided by NPDCL (pp. 26-27) raises doubts on this explanation: Table 1: Agriculture consumption</p> <table border="1"> <thead> <tr> <th>Particulars</th> <th>2016-17</th> <th>2017-18</th> <th>2018-19</th> </tr> </thead> <tbody> <tr> <td>% increase in No. of agriculture connections</td> <td>1.23</td> <td>3.06</td> <td>3.11</td> </tr> <tr> <td>% of growth in agriculture sales</td> <td>19.99</td> <td>23.48</td> <td>18.46</td> </tr> </tbody> </table>	Particulars	2016-17	2017-18	2018-19	% increase in No. of agriculture connections	1.23	3.06	3.11	% of growth in agriculture sales	19.99	23.48	18.46	<p>TS Discoms would like to state that the assessment of agricultural consumption is done every month, as per the ISI methodology, approved by the Hon'ble Commission and the same are submitted to the Hon'ble TSERC. For this purpose, the sample for each capacity (i.e., kVA rating) is chosen using random sampling procedure. The consumption of each of these sample DTRs are measured each month. The average consumption per DTR is then estimated from the total consumption of all the sample DTRs in each circle. The average DTR consumption of each capacity of DTR population is the basis for extrapolation of the agricultural consumption.</p> <p>It is further to submit that, agriculture consumption varies on year to year based on different factor such as rainfall in season, period of rain fall, cultivation area, types of crops, ground Water availability and in addition to releasing of new services during the year will also effect on agriculture consumption.</p> <p>The sudden growth in agriculture consumption is mainly due to the TS Govt. efforts to provide reliable and quality supply to the consumers. TS Discoms have always strived to provide connections to the consumers and supply power with minimum breakdown/ power cuts. At the time of formation of state TS Discoms were facing challenges to supply power to all consumers leading to power deficits. Over the years TS Discoms have overcome the challenges and are now able to supply the required amount of power to the consumers. Licensees had started supplying 24hrs power to all agricultural consumers w.e.f. date January 1, 2018. This has resulted in significant increase in agricultural sales over the previous years.</p>
Particulars	2016-17	2017-18	2018-19											
% increase in No. of agriculture connections	1.23	3.06	3.11											
% of growth in agriculture sales	19.99	23.48	18.46											
4	<p>From January 2018 agriculture connections in Telangana are being given 24 hour supply and it is mentioned as one of the reasons for increased electricity consumption in agriculture sector. But the above table leads to doubts on this count also. In FY 2016-17, a year before the initiation of 24 hour electricity supply to agriculture, consumption was reported to have increased by 19.99% while number of connections increased by 1.23% only. During FY 2018-19, after initiation of 24 hour electricity supply consumption increased by 18.46% while number of connections increased by 3.11%. Such data raises further doubts on TSDISCOMs' claims regarding electricity consumption by agriculture services.</p>													
5	<p>What is more, both the DISCOMs project that consumption by agriculture services during the ensuing year will be less than during the current year. According to TSNPDCL filing LT agriculture consumption will be 7,525 MU</p>	<p>TS Discoms are expecting that the sales of agriculture category will decrease with upcoming LIS Loads as these two are complementary things, i.e. Increase in LIS consumption would provide easy</p>												

	<p>during FY 202-23 compared to 7,839 MU during FY 2021-22. In the case of TSPDCL the LT agriculture consumption is expected to be 11,647 MU for 2021-22 and 11,182 MU for 2022-23. Increasing irrigation under lift irrigation schemes is expected to bring down electricity consumption by agriculture pump sets. Newspaper reports also indicate that electricity consumption in agriculture sector in the state is coming down due to spread of surface irrigation and decline in area under paddy, particularly during rabi season. (<a href="https://www.thehansindia.com/telangana/nizamabad-irrigationfacilities-lead-to-less-power-consumption-in-northern-districts-724003">https://www.thehansindia.com/telangana/nizamabad-irrigationfacilities-lead-to-less-power-consumption-in-northern-districts-724003</a>) Impact of increasing cultivation under lift irrigation/surface irrigation on electricity consumption by agriculture pump sets needs to be carefully analysed.</p>	<p>accessibility for water and help agriculture consumers to pump the water by consuming a lesser amount of energy.</p> <p>Projecting LIS sales consist of a high amount of unpredictability, availability of water is an important factor. However, LIS sales are projected by considering the current pumping stations loads on Krishna &amp; Godavari river and any upcoming additional loads. These loads are further considered to be operating only at a 60% load factor. Thus, if all conditions work fine LIS loads would generate the projected LIS Sales consumption and would also affect the agriculture sales causing it to decrease marginally.</p> <p>Thus, TS Discoms have considered a past reference i.e. CAGR while projecting sales for LT Agriculture Consumption of LIS is carefully determined as explained above; a separate team dedicatedly works on LIS sales projections.</p>
6	<p>Lift irrigation schemes in Telangana have emerged as one of the major electricity consumers. During the ensuing year these lift irrigation schemes along with Composite Public Water Supply Schemes (CPWS) are projected to consume 14,962 MU accounting for 17.76% of electricity requirement in the state. Both the DISCOMs have adopted very high consumption growth rates in the case of lift irrigation schemes. TSNPDCL projected that during the FY 2022-23 power consumption by lift irrigation schemes would be three times higher than in FY 2021-22. TSNPDCL also included 1,128 MU towards pumping of additional TMC of water. But works related to additional TMC are caught up in controversy and operationalisation of it during the ensuing year is doubtful. As such power requirement of this component may not be included.</p> <p>NPDCL projected total connected load of lift irrigation schemes in FY 2022-23 to be 3,714 MW. According to SPDCL's filing highest expected load in a month will be 617 MW in November 2022. According to a newspaper report</p>	<p>The methodology followed for determining LIS Sales is slightly different than for what is used for projecting other categories.</p> <p>LIS category has been recently introduced thus historical data is not available. The rest all categories are projected based on historical figures i.e. CAGR basis.</p> <p>LIS sales are projected by considering the current pumping stations loads on Krishna &amp; Godavari river and any upcoming additional loads. These loads are further considered to be operating only at a 60% load factor. Thus, if all conditions work fine LIS loads would generate the projected LIS Sales consumption</p> <p>As per LIS data total current connected Load (60% of installed load) for NPDCL is 10209 MW and for SPDCL is 3232 MW.</p> <p>Conservation of Energy is one of the prime aims of Disocms. TS Discoms always try to use energy effectively, in line with the same TS</p>



	<p>the irrigation department had given an indent for 2,500 MW demand per day. (Velugu, 11 November, 2021) This is far less than the total loads indicated by TSDISCOMs. Another newspaper report indicated that the State Government of Telangana had initiated an exercise to bring down electricity cost of lift irrigation schemes by regulating the use of lift irrigation pumps according to water needs. This was expected to save electricity as well as water. A command control centre is reported to have been set up in Hyderabad to operate and manage lift irrigation systems in the state. (Andhra Jyothi, 28 October, 2021) These interventions are expected to bring down electricity consumption by lift irrigation systems in the state.</p>	<p>Discoms always try to save energy for their major consumer categories.</p>								
7	<p>During the ensuing year T&amp;D losses will account for 11.27% of the electricity requirement in the state. While it will be 10.43% in the case of NPDCL it will be 11.71% in the case of SPDCL. For the FY 2018-19 the Tripartite MoU under UDAY set the AT&amp;C losses of TSNPDCL at 10.00% and TSSPDCL at 9.90%. The T&amp;D losses projected by TSDISCOMs in the ARR for FY 2022-23 are higher than the levels stipulated for the FY 2018-19 under the Tripartite UDAY - MoU. The TSDISCOMs have claimed that, after formation of the Telangana State, Rs.31,968 crore has been spent on transmission and distribution networks. Despite such huge investments on T&amp;D network in the state TSDISCOMs have failed to achieve the target set by UDAY on AT&amp;C losses. AT&amp;C losses include collection efficiency along with T&amp;D losses. T&amp;D loss levels should have been much less than AT&amp;C losses. This shows that there is scope to bring down T&amp;D losses from the levels projected in the ARRs. When the estimated T&amp;D losses are brought down to the previous or even to lower levels the quantum of power to be procured will also come down.</p> <p>Table 2: T&amp;D and AT&amp;C losses in Hyderabad</p> <table border="1" data-bbox="233 1312 1073 1437"> <thead> <tr> <th>Circle</th> <th>Division</th> <th>T&amp;D Losses (%)</th> <th>AT&amp;C Losses (%)</th> </tr> </thead> <tbody> <tr> <td>Hyd - Central</td> <td>Mehdipatnam</td> <td>22</td> <td>19.28</td> </tr> </tbody> </table>	Circle	Division	T&D Losses (%)	AT&C Losses (%)	Hyd - Central	Mehdipatnam	22	19.28	<p>TSDISCOMS are strictly adhering to the loss targets as stipulated in the wheeling Tariff Order for the Distribution Business for 4<sup>th</sup> control period (FY19-20 to FY23-24) Dated:29.04.2020 issued by the Hon'ble Commission in the projections of energy requirement for the ensuing year i.e., FY22-23.</p>
Circle	Division	T&D Losses (%)	AT&C Losses (%)							
Hyd - Central	Mehdipatnam	22	19.28							

	Hyd - South	Asmangadh	39	35.01	
		Begumbazar	35	34.01	
		Charminar	38	35.73	
8	<p>TSSPDCL's Energy Audit Report for the period 01-07-2021 to 30-09-2021 brought out the disturbing information contained in the above Table. In the case of four divisions listed in the above table T&amp;D losses were above 20% of the electricity in put in to the network. These four divisions are not located in any for away, remote corner of the DISCOM area, posing problems in terms of billing due to inaccessibility. These divisions are located in the heart of the City of Hyderabad and these divisions are at a stone's throw away from the corporate office of the TSSPDCL and Office of the Commission. Even more striking information is that AT&amp;C losses are lower than T&amp;D losses. In these divisions collection efficiency if more than 100%. In these divisions 20 to 40% of the electricity input is not metered. If we assume technical losses of 5% remaining 15 to 35% of the electricity is being stolen under the very nose of the powers that be. This issue of high T&amp;D losses in these areas was raised in the past also but to no avail. We request the Commission not to allow T&amp;D losses above 5% and direct the DISCOM to take the responsibility of the remaining losses from its own resources. It is not fair to burden the sincere consumers with the losses due to theft/ illegal activity of other consumers.</p>				Pertains to TSSPDCL
9	We request the Commission to direct TSNPDCL to make Energy Audit Reports public.				TSNPDCL Energy Audit Report 2 <sup>nd</sup> Quarter of FY 2021-22 was uploaded in TSNPDCL website.
10	Past experiences show that actual power procurement by the TSDISCOMs was much less than their ARR proposals. The power procurement estimates prepared as a part of ARR proposals related to the FY 2022-23 also appears to be overestimated. These estimates need to be subjected to detailed scrutiny.				TS Discoms would like to state that the projected energy requirement (and power procurement) are significantly higher in FY 2022-23, due to the expected additions of LIS loads. The detailed category-wise justifications for the sales projections, have also been elaborated in the write-ups.
11	According to TSDISCOMs' ARR and Tariff filings for FY 2022-23 electricity availability will be 87, 288 MU dispatch will be 84,222 MU leaving a surplus of 3,066 MU. But this surplus figure is an underestimate and misleading.				TS Discoms have considered the month-wise energy availabilities for FY 2022-23, as per the projections shared by the respective

	<p>Actual surplus electricity available according to their submissions should have been 5,458.50 MU.</p> <p>Table 3: Power availability, dispatch and surplus (MU)</p> <table border="1" data-bbox="233 354 1094 521"> <thead> <tr> <th>Generating Station</th> <th>Availability</th> <th>Dispatch</th> <th>Surplus</th> </tr> </thead> <tbody> <tr> <td>TSGENCO – Thermal</td> <td>27,434.98</td> <td>27,206.10</td> <td>228.88</td> </tr> <tr> <td>CGS</td> <td>21,611.51</td> <td>17,960.27</td> <td>3,651.24</td> </tr> <tr> <td>Singareni</td> <td>9,044.38</td> <td>7,466.00</td> <td>1,578.38</td> </tr> <tr> <td>Total</td> <td>58,090.87</td> <td>52,632.37</td> <td>5,458.50</td> </tr> </tbody> </table>	Generating Station	Availability	Dispatch	Surplus	TSGENCO – Thermal	27,434.98	27,206.10	228.88	CGS	21,611.51	17,960.27	3,651.24	Singareni	9,044.38	7,466.00	1,578.38	Total	58,090.87	52,632.37	5,458.50	<p>generating station and energy requirement as per the estimated sales projections, and loss levels.</p> <p>TS Discoms would like to clarify that the annual energy surplus shown of 3,066 MU, is after netting off the energy shortfall of 2,393 MU from the energy surplus of 5,459 MU.</p> <p>Month-wise energy surplus/ shortfall can be arrived at by considering the month-wise energy availability and energy requirement.</p> <p>TS Discoms would state that because of the month-wise variations in the energy availability, there will be cases of surplus in few months and shortfall in few, which is an unavoidable case. The energy shortfall in certain months of the year, is expected to be procured from the short-term market. The summation of shortfall in such months' amounts to 2,393 MU. While, in other months, where there is an energy surplus, the summation will amount to 5,459 MU. These two nos. can't be compared, as they are occurring at different months of the year.</p> <p>It is further clarified that the short-term power can't be considered under availability. The energy dispatch has to match with the energy requirement, hence the short-term has been shown under the same. TS Discoms haven't considered the sale of surplus power, as the revenue from sale of such surplus power will be lower than the cost of the power procured from the marginal station, during that particular month i.e. procuring such excess power for the purpose of sale, shall be costlier and further burden the end consumer.</p>
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12	<p>While 58,090.87 MU will be available from TSGENCO – thermal units, CGS units and Singareni power plant 52,632.37 MU will be dispatched leaving a surplus of 5,458.50 MU. TSDISCOMs show a surplus of 3,066 MU only as short-term purchases of 2,393 units appear under dispatch but do not figure under availability leading to higher quantum of dispatch and lower surplus. Even if 2,393 MU of short-term power is procured surplus electricity available will be 5,458.50 MU, as long as more power is not procured from these public sector plants.</p> <p>The related question is – when 5,458.50 MU of surplus power is available is there need to go for short term purchase of 2,393 MU at a higher price?</p>	<p>generating station and energy requirement as per the estimated sales projections, and loss levels.</p> <p>TS Discoms would like to clarify that the annual energy surplus shown of 3,066 MU, is after netting off the energy shortfall of 2,393 MU from the energy surplus of 5,459 MU.</p> <p>Month-wise energy surplus/ shortfall can be arrived at by considering the month-wise energy availability and energy requirement.</p> <p>TS Discoms would state that because of the month-wise variations in the energy availability, there will be cases of surplus in few months and shortfall in few, which is an unavoidable case. The energy shortfall in certain months of the year, is expected to be procured from the short-term market. The summation of shortfall in such months' amounts to 2,393 MU. While, in other months, where there is an energy surplus, the summation will amount to 5,459 MU. These two nos. can't be compared, as they are occurring at different months of the year.</p> <p>It is further clarified that the short-term power can't be considered under availability. The energy dispatch has to match with the energy requirement, hence the short-term has been shown under the same. TS Discoms haven't considered the sale of surplus power, as the revenue from sale of such surplus power will be lower than the cost of the power procured from the marginal station, during that particular month i.e. procuring such excess power for the purpose of sale, shall be costlier and further burden the end consumer.</p>																				
13	<p>The filings show that all the TSGENCO thermal plants will be operating at below their threshold level PLF. This implies that actual surplus electricity available is much higher than 5,458.50 MU. While threshold level PLF of these plants is 80% to 85% PLF taken in to account in the filings is below 75%, with the exception of Kothagudem -VII (81%) and BTPS (78%). Threshold level of PLF these plants is 85%. If TSGENCO thermal plants operate at threshold level PLF additionally 2,000 to 3,500 MU of electricity</p>	<p>Availability of thermal plants are projected at normative PLF provided in corresponding PPA considering plant overhaul planning. The thermal generating plants are being operated below their threshold PLF due to high penetration of renewable energy at Day time and reduced loads during night time. The Renewable energy plants cannot be backed-down as they are must run stations and also TSDISCOMs have to fulfill RPO obligations to avoid penalty. Availability</p>																				

	will be available taking the surplus electricity available to 7,500 MU to 9,000 MU.	projections considering only threshold level PLF simply or highest PLF projected by one of the private Thermal generator (Sembcorp Energy India Ltd, Earlier TPCIL) would be hypothetical.
14	The filings show that Thermal Power Tech Corporation will be operating its plants at 95% PLF. If other thermal power plants operate at this level surplus electricity available will be much more.	Availability(MU) projections for all TSGENCO Thermal plants is shown at their Normative PLF's as per their respective PPA's. Hence there would be no additional energy available from TSGENCO plants. The contention that the TSGENCO Stations are operating below 75% PLF is not correct.
15	TSDISCOMs in their submissions on Relinquishment of Telangana State's share in CGS units of NTPC Ramagundam 1 and 2 and NLC units I and II claimed that the gap due to foregoing these plants could be filled by operating GENCO plants at higher PLFs.	SLDC have to issue back-down instructions to the generators for balancing the system Demand-Supply to ensure Grid security, based on descending order in the merit order despatch. Sembcorp Energy India Limited (Earlier Thermal Powertech) is being operated at more than 85% PLF as it is in the bottom in the merit order.
16	All these factors show that 3,066 MU of surplus electricity projected by TSDISCOMs is an underestimate as well as misleading figure. Given the scope for surplus electricity available from the generation capacities available to TSDISCOMs during the ensuing year 2022-23 there will be no need to procure short term power from market at higher price.	Availability shown for the FY 2022-23 is based on projections shown from long term contracts which are tied up for meeting Base-load Demand. Everyday 15 minutes Time-Block Scheduling of power from all the available sources is being done based on merit order and any shortage of power due to sudden outages of plants, increase in Demand etc. is being purchased through Power exchanges considering the requirement in each 15 minutes Time-Block. Procurement of power under Short-term (Power Exchanges) considering power shortages in certain Time-Blocks is inevitable to bridge the Day to Day Demand-Supply gap. Power will be purchased from Power Exchanges if it is available at relatively lesser price in order to lower the overall power purchase cost.
17	The information related to power procurement during the years 2020-21 and 2021-22 leads us doubt whether merit order is being followed in power procurement. Variable cost of power from CSPGCL is Rs. 1.20 per unit and that of TPCIL is Rs. 2.26 per unit. If merit order was followed CSPGCL should have been preferred to TPCIL. But in fact, power at higher PLF (80 to 95%) is	Merit Order is being followed by TSSLDC. It may be observed that CSPGCL/CSPDCL is declaring its plant availability in the range of 37 to 52% only instead of normative PAF of

	procured from TPCIL compared to CSPGCL (37 to 52% PLF). We request the Commission to see that merit order is followed in power procurement.	76.5% due to lack of coal, whereas, TPCIL is declaring its Plant availability more than 90%.																								
18	<p>TSDISCOMs propose to spend Rs. 39,415.08 crore on power procurement during the ensuing year. This accounts for 74.29% of aggregate revenue requirement (ARR). Avenues shall be explored to bring down power procurement cost to reduce tariff burden on the consumers as well as budgetary support from the state government. Table 4: Fixed costs</p> <table border="1"> <thead> <tr> <th>Generation Station</th> <th>Fixed cost (Per unit) (Rs)</th> <th>Fixed cost (Per MW) (Rs. In Cr)</th> </tr> </thead> <tbody> <tr> <td>Kothagudem VII</td> <td>2.09</td> <td>1.47</td> </tr> <tr> <td>KTPP II</td> <td>2.17</td> <td>1.41</td> </tr> <tr> <td>BTPS</td> <td>2.82</td> <td>1.92</td> </tr> <tr> <td>CSPGCL</td> <td>2.70</td> <td>1.71</td> </tr> <tr> <td>Singareni</td> <td>1.90</td> <td>1.18</td> </tr> <tr> <td>TPCIL I</td> <td>1.49</td> <td>1.24</td> </tr> <tr> <td>TPCIL II</td> <td>2.40</td> <td>1.99</td> </tr> </tbody> </table>	Generation Station	Fixed cost (Per unit) (Rs)	Fixed cost (Per MW) (Rs. In Cr)	Kothagudem VII	2.09	1.47	KTPP II	2.17	1.41	BTPS	2.82	1.92	CSPGCL	2.70	1.71	Singareni	1.90	1.18	TPCIL I	1.49	1.24	TPCIL II	2.40	1.99	All efforts are being made by TSDISCOMs for Power procurement in most effective way taking every measure to reduce the cost burden on TSDISCOMs, which would indirectly lessen the burden on Consumers.
Generation Station	Fixed cost (Per unit) (Rs)	Fixed cost (Per MW) (Rs. In Cr)																								
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19	<p>TSDISCOMs in their narrative of reasons for the proposed tariff hike highlighted variable cost components like price of coal, transport cost of coal, clean energy cess, etc., While not totally denying these factors, a closure examination of TSDISCOMs' ARR and Tariff filings for the FY 2022-23 shows that fixed costs are equally a cause for the proposed tariff hike. While unit fixed cost increased from Rs. 1.61 in FY 2018-19 to Rs 2.01 in FY 2022-23, unit variable cost declined from Rs. 3.08 to Rs. 2.76. In other words, during this period while unit fixed costs increased by 24.84%, unit variable costs declined by 10.39%. This statistic demands us to pay more attention to increasing fixed cost burden. The important reason for this higher fixed cost is the high capital cost of the thermal power projects that have become operational since formation of separate State of Telangana.</p>	<p>All the Power Purchase Agreements are being entered with Generators/Developers by TSDISCOMs after taking Hon'ble TSERC approval issued after Public hearings.</p> <p>It may be observed that increase in fixed cost from FY 2018-19 to 2022-23 is due to the commissioning of new Thermal and Hydel Projects of TSGENCO taken up to provide reliable and quality power 24 hours to all categories of consumers.</p>																								

20	<p>Fixed costs being paid to new units of TSGENCO are very high. Even when compared to Singareni thermal power project, whose capital cost was considered to be high due to inefficient execution of the project, fixed costs of TSGENCO units are very high. While fixed cost of Singareni thermal power project is Rs. 1.18 crore per MW it is Rs. 1.41 crore in the case of KTPP II, Rs. 1.47 crore in the case of Kothagudem VII and Rs. 1.92 crore in the case of BTPS. TSDISCOMs' ARR filings show that power from CSPGCL is proving to be costly. Per MW fixed cost burden of this plant is Rs. 1.71 Crore compared to Rs. 1.18 Crore of Singareni plant. TPCIL I is a green field project while TPCIL II is a brown field project. Normally, capital cost of brown field project shall be lower than green field project. But in the case of TPCIL brown field unit's fixed cost is higher than green filed unit. These anomalies demand a re-examination of fixed costs of these thermal power plants.</p>	<p>The capital cost of the projects depends on the adopted technology (BTG &amp; BOP), and duration of the project (i.e., zero date to COD of the project) and controllable &amp; un-controllable factors.</p> <p>The Fixed Cost of Singerani Power Project is approved by Hon'ble Commission &amp; finalized, whereas, TSGENCO costs are provisional &amp; yet to be approved by Commission.</p> <p>Further, the capital costs of new stations of TSGENCO are inclusive of FGD cost, which are subject to approval of Hon'ble Commission and the period of construction, capacity of the unit, GST and covid impact etc. are the reasons in respect of BTPS when compared to M/s SCCL.</p> <p>In case of Chhattisgarh, TSDISCOMs have filed appeal before APTEL aggrieved by the CSERC order dt. 07.07.2018 on determination of capital cost, which is pending for adjudication.</p> <p>In case of PPAs with Sembcorp Energy India Limited (Earlier TPCIL), the PPA for 269.45 MW was signed in 2013 for 25 years whereas the PPA for 570 MW was signed in 2016, that too for a period of 8 years only. Hence the rates in the both bids are not comparable. Fixed charges in 269.45 MW PPA under Case-I bidding was increasing year-on-year (Escalation component present) whereas the Fixed Charge in 570 MW PPA under DBFOO would be decreasing by 2% year-on-year, which would be advantageous to TSDISCOMs. Therefore, Tariffs in the both PPAs are not comparable.</p>
21	<p>Fixed cost of Ramagundam B unit was Rs. 51 crores during the FY 2020-21. It is estimated to increase to Rs. 101 crores during the FY 2021-22 and is projected further to increase to Rs. 122 crores in the FY 2022-23. Though there is no change in the capacity of the plant fixed are expected to more than double during the current and ensuing years. No explanation is provided for this hike in fixed cost of Ramagundam – B unit. We request the Commission not allow the increase in fixed cost of this unit.</p> <p>Table 5: Variable costs</p>	<p>Fixed charges of Rs.54.49 Crs. for the year FY 2020-21 is provisional as per the Fixed Charges allowed for the year FY 2018-19 in MYT 2014-19. The FC filed by TSGENCO for MYT 2019-24 is still higher, yet to be approved by Hon'ble Commission.</p> <p>For the year FY 2021-22 and 2022-23, the Fixed Charges claimed in the MYT filings of TSGENCO for FY2019-2024 are 128.52 Cr. and 132.17 Cr. respectively, wherein the O&amp;M charges claim is of average</p>

Generation Station	Variable cost (Per unit) (Rs)		actual O&M charges in the previous control period with escalation as per Hon'ble TSERC Regulation 1 of 2019.
CSPGCL	1.20		
TPCIL – I	2.26		
NTPC Ramagundam I	2.57		
KTPS – V	2.81		However, TSDISCOMS will admit the Fixed Charges as per the approval of TSERC.
KTPS – VI	2.82		
KTPS – VII	2.49		
KTPP - I	2.85		
KTPP – II	2.87		
BTSP	2.91		
YTPS	2.49		
Singareni	2.99		
Ramagundam – B	3.43		
22	<p>Per unit variable cost of coal based thermal power plants supplying power to TSDISCOMs differ widely. This indicates that there is scope to bring down these variable costs. Per unit variable cost of CSPGCL is Rs. 1.20. Compared to this variable cost of all other coal based thermal plants are more than 100% higher. One may argue that CSPGCL is a pit head plant and other plants are not so. Except YTPS all other TSGENCO thermal plants are located near coal mines and expenditure related to dedicated railway lines to transport coal from mines to the power plant are made part of plants' capital cost. As a result, there should not be much difference between variable cost of CSPGCL and variable cost of TSGENCO units. Per unit variable cost of TPCIL is Rs. 2.26. This plant is located far away from coal mines and still its variable cost is less than all TSGENCO thermal power plants.</p>	<p>All the Power Purchase Agreements are being entered with Generators/Developers by TSDISCOMs after taking Hon'ble TSERC approval issued after Public hearings.</p> <p>TSGENCO Stations are having the coal linkages from the M/s SCCL, irrespective of the coal from open cast mines or underground mines.</p> <p>The actual landed cost of fuel claimed mainly inclusive of fuel price corresponding to the grade/quality of fuel, royalty, taxes and duties as applicable, transportation cost by rail/ road/ pipeline or any other means, and, for the purpose of calculation of energy charges, shall be arrived at after considering transit losses.</p>	

23	One may point out that coal for CSPGCL comes from open cast mines which is not the case with TSGENCO units. TSGENCO thermal power plants get their coal supplies from SCCL coal mines located in Telangana. As of FY 2019-20 SCCL produced 86% of coal from open cast mines. As such, cost difference between CSPGCL and TSGENCO thermal units shall not be much.	The landed cost of fuel in respect of TSGENCO stations is being arrived on the following:  (a) Coal is being procured from M/s SCCL, a Govt. entity, and its cost is being paid as per the price notifications of M/s SCCL,
24	Variation in variable costs of the plants may also be due to the efficiency at which these plants are being operated. Some of the units of TSGENCO like KTPS – VII, KTPP – II, BTPS have come in to operation after TPCIL and should have operated more efficiently.	(b) Oil is being procured from central public sector undertakings viz. HPCL, IOCL & BPCL and the oil rates being paid prevailing on the date of supply.  (c) The transportation charges of the fuel by rail are as per the rate circular issued by Ministry of Railways.
25	TSDISCOMs in their submissions on Relinquishment of Telangana State's share in CGS units of NTPC Ramagundam 1 and 2 and NLC units I and II claimed that NTPC Ramagundam units are not pit head plants. Even then variable cost of NTPC Ramagundam units is less than TSGENCO thermal units. This calls for an explanation from both TSGENCO and TSDISCOMs.	Variable cost would vary depending on various factor like year of PPA entered with, PPA period, Plant CoD, Transmission/PoC charges, Fuel cost etc., Hence the variable cost of on PPA cannot be compared with other PPA based on only one factor.  The variable cost of the TSGENCO stations are arrived by considering the norms specified by the Commission and the above fuel parameters. The base price of coal for the M/s SCCL is on higher side compared with the Coal India Limited which supplies coal to the TPCIL
26	Per unit variable cost of Singareni thermal power project is Rs. 2.99. This high variable cost is also attributed to allocation of coal for this plant from Naini coal blocks located in Odisha. SCCL in its letter dated 6.7.2015, to the Ministry of Coal while requesting allocation of coal for its power plant from its coal mines had pointed out that it would be able to supply the coal to its own thermal plant without affecting the existing FSA/linkage quantity to other allottees. The Government of Telangana also sought from Gol allocation of coal from SCCL to its project. But this did not lead to any positive outcome. Under Section 1.1 d) of UDAY – MoU the Government of	TSDISCOMs have addressed Singareni to pursue with Ministry of Coal and SCCL is pursuing with Ministry of Coal, Gol for swapping of coal linkage from Naini to SCCL for Singareni thermal power project.



	India has obligation for ensuring rationalisation of coal linkages. This issue shall be actively taken up with Gol.	
27	Even more worrying is the Gol's proposal to auction four coal blocks of SCCL to private players. This would further complicate allocation of coal available in Telangana to power plants located in Telangana. Government of Telangana opposed this move on the part of the central government. All the trade unions of workers of SCCL went on strike for three days against the move of the Gol. But there is no sign that the central government is reexamining its policy on coal mining.	
28	TSDISCOMs propose to procure 400 MW of solar power from SECI at the rate of Rs. 2.78 per unit and 1692 MW of solar power from NTPC – CPSU at the rate of Rs. 2.82 per unit. At a time when solar power is available at rates below Rs. 2.50 per unit the above rates appear to be higher. Recently SECI offered solar power to Andhra Pradesh at Rs. 2.49 per unit without any interstate transmission costs. TSDISCOMs did not specify on what basis this solar power is being procured from SECI and NTPC-CPSU	<p>The competitive bidding for 400 MW of solar from SECI @ 2.78/kWh under ISTS Tranche-VI scheme &amp; 1692 MW Solar power from NTPC under CPSU scheme at an average cost of Rs.2.82/kWh was concluded in the year 2019. Whereas, the competitive bidding for SECI offered rate of Rs.2.49/kWh to AP was concluded in the year 2021. Also for the aforesaid schemes, the ISTS transmission charges and losses are granted waiver by MoP, Gol. DISCOMs have also signed PSAs with M/s. NTPC @ Rs.2.45/Kwh in 2021.</p> <p>It may be observed that the tariff of solar power projects cannot be compared, as the competitive bidding year and terms and conditions of specification differ.</p>
29	Solar power is suitable for decentralised, distributed power generation. Solar power can be generated at the point of consumption. This will bring down T&D costs as no additional network expansion is needed to utilise solar power. The Central Government also started promotion of decentralised solar power generation in agriculture sector under KUSUM policy. TSDISCOMs shall stop procuring solar power from MW/utility scale solar plants and instead procure solar power from decentralised solar power plants.	<p>Taking the advantage of waiver of ISTS transmission charges granted by MoP, Gol, TSDISCOMs are planning for procurement of power from ISTS connected projects at competitive tariffs discovered through bidding process conducted at national level. Whereas, setting up of distributed solar generation would be uneconomical due to high land cost.</p>

30	<p>TSDISCOMs on the one hand propose to relinquish Telangana State's share in NTPC's Ramagundam Super Thermal Power Station Units I &amp; II and NLC Thermal Power Station Stage 1 &amp; 2 with aggregate capacity of 528.91 MW and on the other propose to procure 500 MW from PTC. Cost of power from NTPC's Ramagundam units is Rs. 3.18 per unit, that of NLC Stage 1 is Rs. 3.47 per unit and that of NLC Stage 2 is Rs. 3.61 per unit. Cost of power (variable rate) from PTC is Rs. 4.29 per unit. Cost of power from NTPC and NLC units proposed to be relinquished is much lower than power from PTC. Given this, we suggest to TSDISCOMs to withdraw the proposal to relinquish Telangana State's share in the above CGS units and to withdraw the proposal to procure costly power from PTC.</p>	<p>TSDISCOMs are proposing to relinquish TS share of Power from NLC Thermal Power Station stage- I &amp; II only. In the tariff petition filed by NLC for the control period 2019-24 before CERC, NLC are claiming for additional tariff based on certain factors such as for Return on Equity on additional capitalization, special allowance in lieu of R&amp;M, high Operation &amp; maintenance expenses and proposed Installation of Flue Gas Desulphurization, by these claims the fixed cost would increase.</p> <p>NTPC &amp; NLC being long term projects, TSDISCOMs have to bear the fixed charge commitment throughout the year, Whereas, in Pilot Scheme-I, the Generator has agreed to supply power in a staggered manner of 6 months in a year for a period of 3 years, as requested by TSDISCOMs i.e., for Rabi &amp; Khariff seasons. The agreement with M/s. PTC will end in September 2022.</p> <p>Moreover, in PTC, the minimum power off take is 55% and if power off take is more than 55%, then utility would get 1% discount in tariff for every 5% incremental off-take beyond 55%, whereas for CGS fixed cost liability is for Normative availability i.e 85%.</p>
31	<p>Andhra Pradesh DISCOMs share the legacy of PPAs related to NTPC Ramagundam I &amp; II and NLC TPS-II with Telangana DISCOMs. It is interesting to note that APDISCOMs took the stand opposite to TSDISCOMs with regard to continuation of PPAs with these two power plants. An extract from APSPDCL's ARR for FY 2022-23 is reproduced below:</p> <p>"The PPA with NTPC Ramagundam I &amp; II was expired on 31.10.2017 and the PPA with NLC TPS-II Stage-I &amp; II is going to expire by 31.03.2021. Power procurement is continued from Ramagundam I &amp; II plant owing to its low price. .... These two projects are old stations with pithead fuel facility, and are presently operating as "Base Load Stations" in AP Power System with</p>	<p>In the filings before CERC, M/s NTPC &amp; M/s NLC are claiming additional tariff based on certain factors like Return on Equity on additional capitalization, special allowance in lieu of R&amp;M, high Operation &amp; maintenance expenses and proposed Installation of Flue Gas Desulphurization, by these claims the fixed cost would increase.</p> <p>The fixed cost of these two plants will increase in future.</p>

	<p>cheaper cost.... Based on the adequacy of the "Base Load" thermal capacity requirement in the system to extend 24X7 reliable, secured and cost effective power supply to the Consumers, APDISCOMs are continuing procurement of power from these pithead stations viz. Ramagundam-Stage-I&amp;II and NLC- TPS-II." (p. 11-12, APSPDCL ARR 2022-23)</p> <p>Average power purchase cost of APDISCOMs is Rs. 4.13 per unit. Average power purchase cost of TSDISCOMs is Rs. 4.78 per unit. This shows that TSDISCOMs are in need of these cheaper power sources compared to APDISCOMs. This makes TSDISCOMs' preference to relinquish this cheaper power inexplicable. We again suggest to TSDISCOMs to withdraw the proposal to relinquish Telangana State's share in the above CGS units.</p>	<p>The average power purchase cost of TSDICOMs is Rs.4.78/Kwh as many new Hydel and Thermal Stations are added after the state formation.</p> <p>The loss of capacity that is proposed to be relinquished will be met from TSGENCO station running at higher PLF and at a lesser cost when compared to M/s. NTPC &amp; M/s NLC.</p> <p>The stakeholder may also compare the quality of power supply and power cuts imposed in both the states. Telangana is supplying reliable, quality power 24 hours to all categories of consumers without any power cuts.</p>
32	<p>Even when TSDISCOMs have 5,458 MU of surplus electricity at their disposal according to their filings related to FY 2022-23, still want to procure 2,393 MU from short term, market sources at a cost of Rs. 3.85 per unit. The TSDISCOMs have not explained the basis for this price, even while showing that price for 2021-22 as Rs.3.59 per unit. In fact, surplus electricity available to TSDISCOMs is much higher than 5,458 MU as all the TSGENCO thermal units, Singareni units and some of the CGS units supplying power to Telangana will be operating at below their threshold PLF. In the background of substantial surplus capacity available to TSDISCOMs we request the Commission not to allow power procurement from short-term, market sources.</p>	<p>Everyday 15 minutes Time-Block Scheduling of power from all the available sources is being done based on merit order and any shortage of power due to sudden outages of plants, increase in Demand etc. is being purchased through Power exchanges considering the requirement in each 15 minutes Time-Block.</p> <p>Procurement of power under Short-term (Power Exchanges) considering power shortages in certain Time-Blocks is inevitable to bridge the Day to Day Demand-Supply gap. Power will be purchased from Power Exchanges if it is available at relatively lesser price in order to lower the overall power purchase cost.</p>
33	<p>TSDISCOMs have proposed increase of 50 p/Unit for all domestic consumers, increase of 1 Rs/Unit for all LT commercial (except haircutting saloons) and increase of 1 Rs/Unit for all LT industry consumers and most of the HY consumers. In addition, there is introduction of fixed charge for domestic, increase for commercial and industry and increase in customer charges and minimum charges. Customer charges in some cases are sought to be increased by more than 100%. Periodic reasonable tariff increase can</p>	<p>TS Discoms would like to state that the last tariff hike approved by the the Hon'ble commission was in FY 2016-17, While, it has been five years now since the last tariff hike, but in the said duration, all the costs incurred by TS Discoms in terms of Power purchase cost, Transmission and Network cost etc. have increased significantly, leading to a constantly increasing revenue gap.</p>

be acceptable, but this sudden increase in tariff after five years and that too same increase for all slabs in absolute terms is not reasonable.

Table 6: Tariff proposal (Rs. In Cr)

Particulars	NPDCL	SPDCL	Total
ARR	18,183.36	34,870.18	53,053.54
Revenue from current tariffs	10,702.75	25,708.51	36,411.26
Non-tariff income	29.41	33.10	62.51
Revenue deficit	7,451.21	9,128.53	16,579.78
Revenue through proposed tariffs	1,786.63	5,044.27	6,830.90
Tariff hike %	16.69	19.62	18.76
External subsidy	4,254.15	1,397.50	5,651.65
Net deficit	1,410.44	2,686.79	4,097.23

Covid Pandemic and also subsequent second wave has greatly impacted the finances of Discoms. The Policies of the Government of India have also led to the increase in costs due to clean cess, coal costs, railway freight etc.

There has been an increase in finance cost due to strengthening the Transmission and Distribution Network by investing Rs. 34,087 crores to supply reliable power in the state to all categories of consumers including free supply to Agriculture.

The per-capita consumption and the peak demand of Telangana have increased significantly since the formation of the state.

In view of the above, Discoms have proposed the hike in Fixed Charges, Consumer charges & minimum charges.

34 TSDISCOMS' tariff proposals will lead to collection of Rs. 6,830.90 crore as additional revenue. This implies a tariff hike of 18.76%. But the tariff impact on different consumer categories varies. Some consumer groups face a tariff hike of more than 50%.

Table 7: Impact of tariff increase - 1

Slab	Existing tariff	Proposed tariff	Consumption	Existing energy charges	New energy charges	Demand charges	Total new charges	% increase
	Rs. /U	Rs. /U	Unit	Rs.	Rs	Rs.	Rs.	%
LT-1 (A)								
0-50	1.45	1.95	50	72.50	97.50	15	112.50	55.20
51-100	2.60	3.10	100	202.50	252.50	30	282.50	39.50
LT-1 (B)(i)								

TS Discoms shall also improve its revenue by the following measures –

Conversion of remaining 20% non IRDA services to IRDA services, leading to increase in Billing Efficiency.

TS Discoms are preparing a scheme for installation of smart meters in a phased manner.

TS Discoms have proposed the tariff hikes for different consumer categories and their respective sub-slabs.

The objection made in terms of disproportionate hike for some slabs of categories, and hikes for other consumer categories, can be addressed through following points –

0-100	3.50	3.80						
101-200	4.30	4.80	101	334.30	384.80	45	429.80	28.60
			200	760.00	860.00	45	905.00	19.10
LT-1 (B) (ii)								
0-200	5.00	5.50						
201-300	7.20	7.70	201	1007.20	1107.70	75	1182.70	17.40
301-400	8.50	9.00	301	1728.50	1879.00	75	1954.00	13.00
401-800	9.00	9.50	401	2579.00	2779.50	75	2854.50	10.70
800+	9.50	10.00	801	6179.50	6580.00	150	6730.00	8.90

35 Domestic consumers in the lower slabs face higher tariff hike compared to consumers in the higher slabs. As the above Table shows while domestic consumers in the 0-50 units slab face tariff hike of 55.20%, consumers in the 51-100 units slab face tariff hike of 39.50%, consumers in the 401-800 units slab face tariff hike of 10.70% and consumers in the 800 + units slab face tariff hike of 8.90%. This shows that poor households who consume less than 50 units per month face disproportionately high tariff hike. In the above table changes only in energy charges and demand charges are taken in to account. Changes in customer charges and minimum charges also impact tariff burden. These changes are taken in to account in the following table:

Table 8: Impact of tariff increase - 2

	Current	Propose d	% Incras e	Rs/Unit Curren t	Rs/Unit Propose d
Average monthly consumption	46 units				
Energy charge 0-50 Rs/U	1.45	1.95			
Energy charge 51-100 Rs/U	2.60	3.10			
Demand charge Rs/month	0	15.00			
Customer charge Rs/month	30.00	70.00			
Energy charge Rs/month	67.00	90.00	34		

The tariff for 0-50 units domestic category has been constant for last 20 years. Over these years the purchase parity of the consumers has increased multi fold times, similarly the cost per unit for producing one unit of power has also increased. Thus, the proposed hike is justifiable.

For LT Domestic, the proposed tariffs are still significantly lower than the Cost of Service for FY 2022-23.

TS Discoms have carried out the Tariff Comparison analysis of all the major consumer categories across various states. It was found that the tariffs for the lower domestic slabs, LT Commercial and Industrial, HT Commercial and Industrial categories for Telangana are significantly lower when compared with the other major states like Gujarat, Uttar Pradesh, Haryana, Rajasthan, Punjab, West Bengal etc. Thus, the proposed hike is justifiable.

TS Discoms would abide by the instructions of Hon'ble Commission, in terms of percentage increase in tariffs, instead of absolute increase across various consumer categories, provided such approach leads to the same additional revenue, as proposed in the tariff filings.

	Monthly Electricity bill Rs.	97.00	175.00	80	2.10	3.78
	Minimum charges single ph. < 1 kW Rs.	25.00	65.00			
	Monthly No consumption bill Rs.	55.00	150.00	173		
36	<p>In the case of domestic consumers, the tariff increase in energy charge and customer charge as well as the introduction of fixed charge is expected to increase tariff revenue by Rs 960 Cr, that is an average increase of 13%. But the average monthly electricity bill of a typical 0-100 slab domestic consumers becomes nearly double because of this tariff increase. This is going to impact a large number of people in Telangana, since 0-100 domestic slab consumers are nearly two-third of the total 1.15 Crore domestic consumers. In the above Table the rows in bold give the impact of tariff increase. Monthly average consumption by domestic consumers in the 0-100 units' slab is 46 units. Under the present tariff monthly electricity bill will be Rs. 97 and under the proposed tariff monthly electricity bill will be Rs. 175, which shoes a 80% increase in monthly tariff. In the last row impact of changes in minimum charges is examined. A consumer has to pay minimum charges even when there is no consumption. In this case consumer has to pay customer charges and minimum charges. Hence if the household does not consume even one unit of electricity in a month, they would have to pay Rs. 150/month as opposed to current Rs.55/month - that is nearly three times!</p>					
37	<p>This is quite unreasonable. A similar situation would arise for small commercial and small industrial consumers. The reason for this is the uniform increase of 50 paise or 1 rupee/unit for all slabs. For the domestic consumers, we propose that the tariff increase should be in percentage terms, not in absolute value. The % increase for low slab could be at the inflation rate and for higher slabs, it could be higher. This would reduce the</p>					

	<p>tariff impact on small consumers and would respect the very idea of slab wise telescopic tariff. For example, 4-5% increase in energy charge for 0-100 Units, 5-6% for 101-200 and 15% increase for &gt; 200 Units/month would result in similar additional tariff revenue. In addition, there should be no fixed charges (demand charges and consumer charges) for the lowest domestic slab of 0-100.</p>																																																												
38	<p>Electrical accident s Table 9:</p> <table border="1" data-bbox="233 651 1140 891"> <thead> <tr> <th rowspan="2"></th> <th colspan="3">No. of accidents</th> <th colspan="3">Exgratia paid</th> </tr> <tr> <th>NPDCCL</th> <th>SPDCCL</th> <th>Total</th> <th>NPDCCL</th> <th>SPDCCL</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>2020-21</td> <td>460</td> <td>238</td> <td>698</td> <td>351</td> <td>178</td> <td>529</td> </tr> <tr> <td>H1 of 202122</td> <td>222</td> <td>76</td> <td>298</td> <td>123</td> <td>133</td> <td>356</td> </tr> </tbody> </table> <ol style="list-style-type: none"> <li>During the FY 2020-21 the number fatal accidents involving humans stood at 698. This is the highest number of fatal accidents in the recent past. The last highest number of fatal accidents were 678 in FY 2016-17. This shows that instead of electrical accidents coming down they are on the rise, in spite of huge investments in men and materials to strengthen T&amp;D network.</li> <li>In the past the DISCOMs provided causes for these fatal electrical accidents. This time DISCOMs did not provide such information. We request the Commission to direct the DISCOMs to provide causes for these fatal electrical accidents.</li> <li>The information provided by TSDISOMs on electrical accidents show that most of the fatal accidents took place in circles with predominantly rural services. These accidents are low in urban circles.</li> </ol>		No. of accidents			Exgratia paid			NPDCCL	SPDCCL	Total	NPDCCL	SPDCCL	Total	2020-21	460	238	698	351	178	529	H1 of 202122	222	76	298	123	133	356	<p>The no. of fatal electrical accidents involving human beings are increased over the cases reported in 2016-17 due to the reason that the accident taken place in the premises of consumers at their fault were not used to bring into the notice of department earlier but now each and every case is being reported for which ex-gratia is being paid by NPDCL.</p> <p>The cause wise accidents reported for the year 2020-21 and 2021-22 (upto 30<sup>th</sup> September) is herewith given below:</p> <table border="1" data-bbox="1178 821 1913 1401"> <thead> <tr> <th>cause_accd</th> <th>FY 2020-21</th> <th>FY 2021 - 22 (up to Sep)</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Electrocuted while drinking/moving in water of canals/ponds/lakes/river where supply is extended through damaged service wires/motor (Authorized service)</td> <td>1</td> <td>5</td> <td>6</td> </tr> <tr> <td>Electrocuted while fishing duly extending supply from nearby lines</td> <td>1</td> <td>7</td> <td>8</td> </tr> <tr> <td>Insulation failure to I/C service wire or domestic services / faulty house wiring / Appliances</td> <td>172</td> <td>91</td> <td>263</td> </tr> <tr> <td>Low height of DTR plinth ( Touching HT bushes or LT bushes or Fuses )</td> <td>5</td> <td>3</td> <td>8</td> </tr> <tr> <td>Repairing AGL or other motor / starter / Service Wire</td> <td>84</td> <td>26</td> <td>110</td> </tr> <tr> <td>Supply Passing to stay wire / Iron pole / DP Structure</td> <td>4</td> <td>5</td> <td>9</td> </tr> <tr> <td>Touched the Sagged/Snapped / fallen conductor due to Gale &amp; Wind</td> <td>6</td> <td>5</td> <td>11</td> </tr> </tbody> </table>	cause_accd	FY 2020-21	FY 2021 - 22 (up to Sep)	Total	Electrocuted while drinking/moving in water of canals/ponds/lakes/river where supply is extended through damaged service wires/motor (Authorized service)	1	5	6	Electrocuted while fishing duly extending supply from nearby lines	1	7	8	Insulation failure to I/C service wire or domestic services / faulty house wiring / Appliances	172	91	263	Low height of DTR plinth ( Touching HT bushes or LT bushes or Fuses )	5	3	8	Repairing AGL or other motor / starter / Service Wire	84	26	110	Supply Passing to stay wire / Iron pole / DP Structure	4	5	9	Touched the Sagged/Snapped / fallen conductor due to Gale & Wind	6	5	11
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This implies that the rural consumers are not receiving quality service. Every step shall be taken to correct this anomaly.

4. The Construction, Operation & Maintenance of electrical plant & lines especially at distribution level by DISCOMs is in a very unsafe condition. DISCOMs are not following the basic statutory safety regulations of CEA. The state government and its CEIG are not taking action on DISCOMs.
5. At many places especially in rural areas, bare live parts in DTRs and associated bare lines and wires are not kept inaccessible to living beings. Barriers, fences and enclosures and minimum clearances to ground are not maintained so that live parts are out of reach to prevent fatal shocks as required in Regulations 58,17,37(1) and 44(1)(i) of CEA (Measures relating to safety and electric supply) Regulation, 2010
6. For safety, isolating A B switch on H.V side of DTRs are to be kept in working condition as per Regulation 80(2)(a)(b) of CEA (Technical Standards for construction of electrical plants and lines) Regulations, 2010. At many DTRs, A B switches are stuck in closed position and do not open
7. As per Regulations 74(1) (2) of CEA (Measures relating to safety and electric supply) Regulation, 2010 and Regulation 78(1) and (2) of CEA (Technical Standards for construction of electrical plants and lines) Regulations, 2010, on all DTRs on H.V sides of transformers, surge diverters are to be provided to protect consumers against transient over voltages due to lightning and switching surges and protect consumers equipment getting damaged. But in almost all DTRs these are not in working condition and are disconnected.
8. The statutory CEA (Safety requirements for construction, operation and maintenance of electrical plants and electric lines) Regulations, 2011 give very important and elaborate policy and management systems for ensuring electrical safety. Regulation 4(4) requires the

Touched the earth wire at the earth pit and got electrocuted	2		2
Touched the electric Fencing provided for Animal Hunting / Animal Guarding	47	13	60
Touching the Snapped and fallen conductor	20	2	22
Touching the lose lines / Low Ground Clearance	3	2	5
Transformer Oil Related or Working on DTR / PTR	1	1	2
Victim came in to Contact with live Conductor (with or without any object)	101	50	151
While replacing HG fuses or LT Fuses of DTR / PTR or Touching the Fuse Box @ DTR	6	5	11
While working on existing line for maintenance / Construction of New Line	7	7	14
<b>Total</b>	<b>460</b>	<b>222</b>	<b>682</b>

From the above, it is clear that most of the cases such as faulty house wiring/appliances in domestic premises, repairing of AGL motors/starters/service wires and the victim accidentally coming into contact with the live conductor with or without any object etc., are with the consumer side only without fault of department.

TSNPDCL is conducting safety week in the first week of May every year and wide publicity is being made by conducting meeting with all types of consumers, distributing pamphlets pasting wall posters in public places and also streaming in local channels and the awareness is being created amount the consumers not to utilize the sub-standard materials like house wiring, switches and service wires and electrical appliances apart from this the awareness among the consumers is also being created by the NPDCL engineers/field staff while visiting the distributing the villages.

All the measures such as providing fencing to DTRs and rising plinth heights, rectification loose lines, by providing middle poles, shifting



<p>supplier to provide physical/financial resources for safety management, internal and external audit of safety. Regulation 5 requires preparation and application of detailed safety manuals/ It gives what matters are to be covered (Refer schedule I &amp; II). Regulations 6(1)(c)(ii) requires appointment of a very senior level officer for safety, working directly under Chief Executive. Regulations 6(1)(d)(e)(f)(g) gives his functions and duties like periodic inspection, audit, training, advising management on prevention of injuries. Regulation 5 of CEA (Measures relating to safety and electric supply) Regulations 2010 which is being revised also deals with electrical safety officer and authorized Chartered electrical safety engineer for periodical testing and to conform to Regulation 30 &amp; 43.</p> <p>9. To the best of our knowledge TSDISCOMs are not implementing the above mandatory regulations. TSERC is requested to order TSDISCOMs to submit detailed report and evidence to show their total commitment to these management level Regulations.</p> <p>10. According to a newspaper report TSNPDCL is taking a loan of Rs. 1,500 crores from REC to bring down electrical accidents. This news report also mentioned that already first instalment of Rs. 300 crores were released. We would like to know whether the Commission's approval was obtained for this spending. In the recent past the Commission had allotted Rs. 5 crore to each DISCOM to take up works to improve safety. But DISCOMs did not care to spend this amount despite large number of electrical accidents. Since the formation of Telangana state more than Rs. 31,000 crore was spent on strengthening T&amp;D network in the state. And this did not help to bring down electrical accidents. We doubt whether this spending of Rs. 1,500 crore on system strengthening will alter the situation on the ground, as long attitude of the TSDISCOMs change towards safety electrical network in the state.</p>	<p>of lines/DTRs from middle of the road to outside and etc. are taken in various schemes such as DNRD, Palle pragathi/Pattana pragathi and system strengthening work schemes\for awarding electrical accidents.</p> <p>Regular maintenance of lines and DTRs is being carried out to rectify the system defects including repairing of faulty AB switches</p> <p>All the technical standards in construction of electrical lines and DTRs is being maintained and frequent inspections are also being carried out by quality control wing to ensure quality of works, lightening arrestors are being provided to all the DTRs at the time erection as well as at the time replacing the failed DTRs in addition to the above line type LAs in the line are also being provided for maintaining of electrical safety regular procurement of safety items such as rubber hand gloves, rubber gum boots, PP ropes, earth discharge rods, safety belts etc., is being done and expenditure incurred towards such procurement for the last two years is found to be about Rs.75 lakhs.</p> <p>As such all the statutory CEA regulations 2011 will be ensured in effective manner.</p>
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TSDISCOMs' financial crisis:

Table 10: Deficit (Rs. In Cr)

Year	NPDCL	SPDCL	Total
2018-19	3,877.87	6,354.87	10,232.74
2019-20	1,712.28	5,604.01	7,316.29
2020-21	2,369.79	6,296.97	8,666.76
2021-22	3,615.98	7,007.86	10,623.84
Total	11,575.92	25,263.71	36,839.63

The above deficit is after taking in to account subsidy provided by the state government. Table 11: Losses: (Rs. In Cr)

Year	NPDCL	SPDCL	Total
2014-15	1,343	1,171	2,514
2015-16	1,010	2,369	3,379
2016-17	1,502	4,700	6,202
2017-18	1,561	3,925	5,486
2018-19	3,060	4,967	8,027
2019-20	1,116	4,940	6,056
Total	9,592	22,072	31,664

Source: TSDISCOMs' Annual Reports

TSDISCOMs are facing severe financial crisis. Total losses of TSDISCOMs from FY 2014-15 to FY 2019-20 are Rs. 31,664 crore. These losses are equivalent to 59.68% of ARR of FY 2022-23. This information on losses is gathered from TSDISCOMs annual reports. Annual Reports are not available for the FY 2020-21 and 2021-22. According to ARR filings of FY 2022-23 total deficit of TSDISCOMs over the period FY 2018-19 to FY 2021-22 is Rs. 36, 839.63 crore. This is equivalent to 69.44% of ARR of 2022-23. This mirrors the depth of financial crisis facing TSDISCOMs. This financial crisis raises doubts on future of DISCOMs.

TS Discoms would like to state that the last tariff hike approved by the the Hon'ble commission was in FY 2016-17, While, it has been five years now since the last tariff hike, but in the said duration, all the costs incurred by TS Discoms in terms of Power purchase cost, Transmission and Network cost etc. have increased significantly, leading to a constantly increasing revenue gap.

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TS Discoms shall also improve its revenue by the following measures

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- Conversion of remaining 20% non-IRDA services to IRDA services, leading to increase in Billing Efficiency

TS Discoms are preparing a scheme for installation of smart meters in a phased manner

GoTS has already infused the equity of INR 9,161 Cr., in addition to the subsidy, which is improving the cash flows of Discoms.

		Annual reports of FY 2020-21 are also placed in website on 09.02.2022.
40	<p>This financial crisis of TSSDISCOMs is result of their inability to file ARR and tariff proposals for the last three years. TSDISCOMs did not have the approval from the State Government of Telangana to file ARR and tariff proposals. The same thing applies to true up filings. The existing regulations allow power purchase true up annually but TSDISCOMs did not file true up claims for the period 2018-19 to 2021-22. As a result TSDISCOMs have to face huge deficits between the costs incurred by them and the revenues received by them. In order to run the show these DISCOMs have borrowed heavily. The interest burden of this further adds to the financial misery of DISCOMs. This interest burden constitutes the carrying cost of the debt and the TSDISCOMs have no way of recovering this interest burden through true up as normally Electricity Regulatory Commission allow carrying cost only from the time of filing of true up petitions.</p>	<p>TTS Discoms would like to state that they have been filing the ARR petitions, on an annual basis, before the Hon'ble Commission (TSERC) until FY 2018-19. From FY 2019-20 onwards, the Discoms have not filed the ARR petitions before the Hon'ble TSERC, due to the following reasons –</p> <p>Enforcement of Model Code of Conduct in the State of Telangana in view of elections for Telangana Assembly.</p> <p>Hon'ble TSERC was not operational from 9th Jan 2019, after the Chairman of Hon'ble TSERC demitted office after attaining the age of 65 years.</p> <p>Enforcement of Model Code of Conduct in the State of Telangana from 10.03.2019 till 23.05.2019 (Lok Sabha election).</p> <p>Pending information from ICAD department on Lift Irrigation (LI) schemes.</p> <p>Issuance of model code of conduct for the Municipal elections from 23.12.2019 to 25.01.2020</p> <p>Further extension in view of preparation of tariff proposals in accordance to the MoP recommendations on Tariff Rationalisation process.</p> <p>Due to imposition of Lockdown in the State by GoTS due to spread of pandemic COVID-19, which impacted the consumption of electricity by various sectors, the licensees intended to file ARR duly including the impact of lockdown due to COVID-19 pandemic.</p> <p>Enforcement of Model Code of Conduct from 17th Nov 2020 to 4th Dec 2020 in view of GHMC elections.</p>

		<p>Certain unavoidable circumstances viz; uncertainty in commissioning of the LI pumps and delay in receipt of information of power availability and cost there on from Central Generating Stations, which have significant impact on the demand projections and overall ARR respectively.</p> <p>However, ARR for 2019-20, 2020-21, 2021-22 was submitted before TSERC on March 31, 2021, which was not admitted by the Hon'ble Commission due to non submission of tariff proposals by the TS Discoms.</p> <p>TS Discoms have already submitted the Distribution true up claims for 1st, 2nd and 3rd control period along with the APR filing for FY2019-20. TS Discoms have also filed the APR for 2020-21 on 31 December 2021.</p> <p>TS Discoms have already finalized the true up claim for RSB for 2016-17 to 2018-19 and currently drafting the same for 2019-20 &amp; 2020-21 &amp; 2021-22 (Prov.). TS Discoms would be submitting all their RSB true up claims shortly to the Hon'ble Commission.</p>																															
41	<p>Arrears:</p> <p>Table 12: Arrears of Rs. 50,000 and more pending for six months As on 30-09-2021 (Rs. In Cr)</p> <table border="1" data-bbox="233 1081 1068 1243"> <thead> <tr> <th>DISCOM</th> <th>LT</th> <th>HT</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>NPDCL</td> <td>75.45</td> <td>4,817.71</td> <td>4, 893.16</td> </tr> <tr> <td>SPDCL</td> <td>164.44</td> <td>6,921.70</td> <td>7,086.14</td> </tr> <tr> <td>Total</td> <td>239.89</td> <td>11,739.41</td> <td>11,979.30</td> </tr> </tbody> </table> <p>According to ARR filings of FY 2022-23 total arrears of Rs. 50,000 and more pending for six months As on 30-09-2021 are Rs. 11, 979.30 crore. Substantial portion of these arrears have to come state government departments. (While SPDCL mentioned the arrears due from Government departments NPDCL did not show these details). According to Section 1.2 i)</p>	DISCOM	LT	HT	Total	NPDCL	75.45	4,817.71	4, 893.16	SPDCL	164.44	6,921.70	7,086.14	Total	239.89	11,739.41	11,979.30	<p>TSNPDCL pending receivables from Government departments are tabulated below:</p> <p style="text-align: right;"><b>(Rs.in Crs)</b></p> <table border="1" data-bbox="1176 1052 1724 1247"> <thead> <tr> <th colspan="3">Receivables from Govt: (as on 31.12.2021)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Central Govt</td> <td>9.84</td> </tr> <tr> <td>2</td> <td>State Govt</td> <td>5360.79</td> </tr> <tr> <td>3</td> <td>ULBs</td> <td>1692.43</td> </tr> <tr> <td colspan="2"><b>Total :</b></td> <td><b>7063.06</b></td> </tr> </tbody> </table> <p>In addition, a proposal was made to <b>mandate installation of pre-paid metering for Government services</b>. This would help the licensee in reducing the financial burden and timely collection of bills.</p>	Receivables from Govt: (as on 31.12.2021)			1	Central Govt	9.84	2	State Govt	5360.79	3	ULBs	1692.43	<b>Total :</b>		<b>7063.06</b>
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	<p>of UDAY – MoU all outstanding dues from the government departments to DISCOMs for supply of electricity shall be paid by 31-03-2017. Since then arrears in fact increased. There is also no information on pending subsidy payment from the state government. If the Government departments pay in time towards electricity consumed by them and the State Government releases subsidies according to the monthly schedule as stipulated by the Commission TSDISCOMs can bring down debt burden to a large extent.</p>	<p>TS Discoms would like to state that it is unfair on the part of the objector to question the intentions of the GoTS.</p>
42	<p>The delayed payments from the State Government to DISCOMs and DISCOMs' failure to file for annual tariff revision and true ups in time, again due to the State Government, are the main causes behind huge debt burden of DISCOMs as well as the accumulated losses. According to Section 1.3 j) of UDAY – MoU TSDISCOMs shall strive to file tariff petitions in time before TSERC. Due to lack of funds with them DISCOMs are forced to delay payments to GENCO and GENCO in turn has to delay payments for coal supply. Because of irregular payments GENCO has to face adverse terms in coal supply which resulted in higher variable cost. This in turn led to higher power purchase cost. This has become a vicious circle. The issue is how to break this vicious circle.</p> <p>In this whole scenario of financial crisis facing TSDISCOMs the State Government appears to be the main contributor. Had it disbursed the subsidy as promised and allowed the Government Departments to pay for electricity consumption in time, and also allowed the TSDISCOMs as their owner to file for true ups in time this financial crisis would not have unfolded. As such, solution for the present financial crisis of TSDISCOMs lies with the State Government only.</p>	<p>Govt. of Telangana has been adopting the following steps to improve Discom financial position, in addition to the subsidy disbursements for LT Agriculture and LT Domestic consumers -</p> <ul style="list-style-type: none"> <li>● GoTS has started releasing LIS CC charges by providing budgetary support from 2021. This will improve collection efficiency and eventually reduce AT&amp;C losses</li> <li>● GoTS has instructed Panchayat Raj and Municipal administration to pay CC charges as per vide Lr. No. 768, dt. 14.08.2020.</li> <li>● GoTS is releasing the subsidy regulary in the same month.</li> <li>● GoTS has already infused the equity of INR 9,161 Cr., in addition to the subsidy, which is improving the cash flows of Discoms</li> <li>● Telangana is having one of the lowest tariffs, compared to other states in India</li> <li>● Further benefits to SC &amp; ST consumers for domestic use, Haircutting salons, Dobhighats, Laundry shops, powerlooms, poultry farms and spinning mills.</li> </ul> <p>Regarding the delay in ARR proposals, TS Discoms would like to state that they have been filing the ARR petitions, on an annual basis, before the Hon'ble Commission (TSERC) until FY 2018-19. From FY 2019-20 onwards, the Discoms have not filed the ARR petitions before the Hon'ble TSERC, due to the reasons submitted in its abovementioned response to query no. 40.</p>

43	<p>According to Section 1.2 g) of UDAY – MoU “The Government of Telangana shall take over the future losses of the DISCOMs in a graded manner as follows:</p> <table border="1" data-bbox="233 342 1163 618"> <thead> <tr> <th>Year</th> <th>2016-17</th> <th>2017-18</th> <th>2018-19</th> <th>2019-20</th> </tr> </thead> <tbody> <tr> <td>Previous year’s DISCOMs loss to be taken over by the State</td> <td>0% of the loss of 2015-16</td> <td>5% of the loss of 2016-17</td> <td>10% of the loss of 2017-18</td> <td>25% of the loss of 2018-19</td> </tr> </tbody> </table> <p>According to Section 1.2 h) of UDAY – MoU “The Government of Telangana shall provide Operational Funding Requirement (OFR) to the DISCOMs till the DISCOMs achieve turnaround.”</p> <p>The Government of Telangana has done none of these to improve financial condition of TSDISCOMs. Instead, pending payments from the Government of Telangana towards electricity consumed by Government Departments and monthly subsidy release are turning the situation from bad to worse.</p>	Year	2016-17	2017-18	2018-19	2019-20	Previous year’s DISCOMs loss to be taken over by the State	0% of the loss of 2015-16	5% of the loss of 2016-17	10% of the loss of 2017-18	25% of the loss of 2018-19	<ul style="list-style-type: none"> <li>GoTS has already infused the equity of INR 9,161 Cr., in addition to the subsidy, which is improving the cash flows of Discoms</li> </ul> <p>Having said that, Govt. of Telangana has been adopting the following steps to improve Discom financial position, in addition to the subsidy disbursements for LT Agriculture and LT Domestic consumers -</p> <ul style="list-style-type: none"> <li>GoTS has started releasing LIS CC charges by providing budgetary support from 2021. This will improve collection efficiency and eventually reduce AT&amp;C losses</li> <li>GoTS has instructed Panchayat Raj and Municipal administration to pay CC charges as per vide Lr. No. 768, dt. 14.08.2020.</li> <li>GoTS is releasing the subsidy regulary in the same month.</li> <li>GoTS has already infused the equity of INR 9,161 Cr., in addition to the subsidy, which is improving the cash flows of Discoms</li> <li>Telangana is having one of the lowest tariffs, compared to other states in India</li> <li>Further benefits to SC &amp; ST consumers for domestic use, Haircutting salons, Dobhighats, Laundry shops, powerlooms, poultry farms and spinning mills</li> </ul>
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Previous year’s DISCOMs loss to be taken over by the State	0% of the loss of 2015-16	5% of the loss of 2016-17	10% of the loss of 2017-18	25% of the loss of 2018-19								
44	<p>In this context we would like to draw attention of TSERC to the advice given by the Maharashtra Electricity Regulatory Commission (MERC) dated 5th January, 2022 to the Government of Maharashtra under Section 86 (2) of the Electricity Act, 2003 as DISCOMs in Maharashtra are also facing similar financial crisis. The advice includes short-term measures and long-term measures. We request the TSERC to advice the State Government of AP to take relevant measures to improve financial health of TSDISCOMs.</p>	<p>TS Discoms are currently not in a position to comment on the case studies/ arguments shared by the objector on the advice shared by MERC to Govt. of Maharashtra, in the context of resolving financial crisis.</p>										

**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by Sri Dr. Narasimha Reddy Donthi (Public Policy Expert), #201,Aarthi Residency,LN Colony,Saidabad,Hyderabad-500059**

S. No	Summary of Objections / Suggestions	Response of the Licensee
1	<p>1. Sales forecast</p> <p>For FY 2022-23, TSDISCOMs estimated power requirement to be 84, 222 MU. This is increase of 16.69% over the current FY 2021-22. There is no proper substantiation about this higher requirement. A trend analysis for atleast a period of 5 years can be the basis of such estimation. However, since ARR and tariff proposal filings were not done in the last three years it is difficult to assess consumption projections made by TSDISCOMs. TSERC should facilitate provision of such information, before the public hearing. The high electricity consumption growth rates projected for the ensuing year do not appear to be supported by historical experience and need to be moderated.</p>	<p>TS Discoms would like to state that the historical sales have been specified in the Form 3 of the RSF formats. This includes the category-wise actual sales for FY 19, FY 20, FY 21, estimated sales for FY 22 (H1 actuals, H2 projections) and projected sales for FY 23.</p> <p>The detailed category-wise justifications have also been elaborated in the write-ups.</p> <p>As mentioned in the write-up submitted, the major reason for such a significant increase in the energy requirement of FY 23 over FY 22, is due to the expected additional loads of LIS.</p>
2	<p>According to TSDISCOMs' estimates LT domestic consumers will be using 14,143 MU during the ensuing year. LT domestic consumers will account for 16.79% of electricity requirement during the ensuing year. Both the DISCOMs assumed that electricity consumption by LT domestic consumers would increase by 7% during ensuing year while electricity consumption by this consumer category increased by less than 5% during the current year. Given the economic situation created by corona pandemic, projection of 7% growth rate in electricity consumption by LT domestic consumers is at best an unreliable assumption.</p>	<p>TS Discoms would like to state that sales projections for FY 2022-23 have been made by calculating the CAGR for the respective discoms for over a period from 1 year CAGR to 5 year CAGR. Further an appropriate CAGR is considered for predicting sales for FY2022-23.</p> <p>Projecting sales only on the basis of last year's sales growth would not give a perfect picture. Thus CAGR methodology is followed which takes care of the historical trend.</p> <p>TS Discoms agree that due to covid -19 restrictions more people were spending their time in their houses, and thus have considered the growth rate for FY 2022-23 based on the CAGR methodology. In fact the 5 year CAGR (2016-17 to 2021-22) for TS Discoms is ~ 6% for Domestic category thus the projections made by TS Discoms for FY 2022-23 is justifiable.</p>
3	<p>TSDISCOMs estimated that agriculture pump sets would be consuming 18,707 MU of electricity during the ensuing year accounting for 22.21% of electricity</p>	<p>TS Discoms would like to state that the assessment of agricultural consumption are done every month, as per the ISI</p>

requirement in the state. Release of new services was given as one of the reasons for increased electricity consumption by these services. But the following information provided by NPDCL (pp. 26-27) raises doubts on this explanation. Growth in connection and sales has to be supported by data. Table 1: Agriculture consumption

Particulars	2016-17	2017-18	2018-19
% increase in No. of agriculture connections	1.23	3.06	3.11
% of growth in agriculture sales	19.99	23.48	18.46

From January 2018 agriculture connections in Telangana are being given 24 hour supply. However, in FY 2016-17, a year before the initiation of 24 hour electricity supply to agriculture, consumption increased by 19.99% while number of connections increased by 1.23% only. During FY 2018-19, after initiation of 24 hour electricity supply consumption increased by 18.46% while number of connections increased by 3.11%. Such data raises further doubts on TSDISCOMs' claims regarding electricity consumption by agriculture services.

methodology, approved by the Hon'ble Commission and the same are submitted to the Hon'ble TSERC. For this purpose, the sample for each capacity (i.e., kVA rating) is chosen using random sampling procedure. The consumption of each of these sample DTRs are measured each month. The average consumption per DTR is then estimated from the total consumption of all the sample DTRs in each circle. The average DTR consumption of each capacity of DTR population is the basis for extrapolation of the agricultural consumption.

The sudden growth in agriculture consumption is mainly due to the TS Govt. efforts to provide reliable and quality supply to the consumers. TS Discoms have always strived to provide connections to the consumers and supply power with minimum breakdown/ power cuts. At the time of formation of state TS Discoms were facing challenges to supply power to all consumers leading to power deficits. Over the years TS Discoms have overcome the challenges and are now able to supply the required amount of power to the consumers.

Licensees had started supplying 24hrs power to all agricultural consumers w.e.f. date January 1, 2018. This has resulted in significant increase in agricultural sales over the previous years.

4 According to TSNPDCL filing LT agriculture consumption will be 7,525 MU during FY 202-23 compared to 7,839 MU during FY 2021-22. In the case of TSPDCL the LT agriculture consumption is expected to be 11,647 MU for 2021-22 and 11,182 MU for 202223. Increasing irrigation under lift irrigation schemes is expected to bring down electricity consumption by agriculture pump sets.

TS Discoms are expecting that the sales of agriculture category will decrease with upcoming LIS Loads as these two are complementary things, i.e. Increase in LIS consumption would provide easy accessibility for water and help agriculture consumers to pump the water by consuming a lesser amount of energy.

Projecting LIS sales consist of a high amount of unpredictability, availability of water is an important factor. However, LIS sales are projected by considering the current pumping stations loads on Krishna & Godavari river and any upcoming additional loads. These loads are further considered



		<p>to be operating only at a 60% load factor. Thus, if all conditions work fine LIS loads would generate the projected LIS Sales consumption and would also affect the agriculture sales causing it to decrease marginally.</p> <p>Thus, TS Discoms have considered a past reference i.e. CAGR while projecting sales for LT Agriculture Consumption of LIS is carefully determined as explained above; a separate team dedicatedly works on LIS sales projections.</p>
5	<p>Lift irrigation schemes in Telangana have emerged as one of the major segment of electricity consumption. In the ARRs 2022-23, Composite Public Water Supply Schemes (CPWS) are projected to consume 14,962 MU, accounting for 17.76% of electricity requirement in the state. Both the DISCOMs have adopted very high consumption growth rates in the case of lift irrigation schemes. TSNPDCL projected that during the FY 2022-23 power consumption by lift irrigation schemes would be three times higher than in FY 2021-22. TSNPDCL also included 1,128 MU towards pumping of additional TMC of water. TSERC should write to Telangana Irrigation Department to ascertain the status of lift irrigation schemes and the progress. This can help in estimating power requirement realistically.</p>	<p>he methodology followed for determining LIS Sales is slightly different than for what is used for projecting other categories. LIS category has been recently introduced thus historical data is not available. The rest all categories are projected based on historical figures i.e. CAGR basis. LIS sales are projected by considering the current pumping stations loads on Krishna &amp; Godavari river and any upcoming additional loads. These loads are further considered to be operating only at a 60% load factor. Thus, if all conditions work fine LIS loads would generate the projected LIS Sales consumption Consumption of LIS is carefully determined as explained in the above section; a separate team dedicatedly works on LIS sales projections.</p>
6	<p>T&amp;D Losses</p> <p>The T&amp;D losses projected by TSDISCOMs in the ARR for FY 2022-23 are higher than the levels stipulated for the FY 2018-19 under the Tripartite UDAY - MoU. The TSDISCOMs have claimed that, after formation of the Telangana State, Rs.31,968 crore has been spent on transmission and distribution networks. Despite such huge investments on T&amp;D network in the state TSDISCOMs have failed to reduce AT&amp;C losses. AT&amp;C losses include collection efficiency along with T&amp;D losses. T&amp;D</p>	<p>TSDISCOMS are strictly adhering to the loss targets as stipulated in the wheeling Tariff Order for the Distribution Business for 4<sup>th</sup> control period (FY19-20 to FY23-24) Dated:29.04.2020 issued by the Hon'ble Commission in the projections of energy requirement for the ensuing year i.e., FY22-23.</p>

loss levels should have been much less than AT&C losses. TSERC needs to focus on this aspect.

Table 2: T&D and AT&C losses in Hyderabad

Circle	Division	T&D Losses (%)	AT&C Losses (%)
Hyd - Central	Mehdipatnam	22	19.28
Hyd – South	Asmangadh	39	35.01
	Begumbazar	35	34.01
	Charminar	38	35.73

TSERC should direct TSNPDCL to release Energy Audit Reports into public domain.

TSNPDC Energy Audit Report 2<sup>nd</sup> Quarter of FY 2021-22 was uploaded in TSNPDCL website.

7 According to TSDISCOMs' ARR and Tariff filings for FY 2022-23 electricity availability will be 87,288 MU, while dispatch will be 84,222 MU leaving a surplus of 3,066 MU. However, actual surplus electricity available according to their submissions should have been 5,458.50 MU.

Table 3: Power availability, dispatch and surplus (MU)

Generating Station	Availability	Dispatch	Surplus
TSGENCO – Thermal	27,434.98	27,206.10	228.88
CGS	21,611.51	17,960.27	3,651.24
Singareni	9,044.38	7,466.00	1,578.38
Total	58,090.87	52,632.37	5,458.50

TS Discoms have considered the month-wise energy availabilities for FY 2022-23, as per the projections shared by the respective generating station and energy requirement as per the estimated sales projections, and loss levels.

TS Discoms would like to clarify that the annual energy surplus shown of 3,066 MU, is after netting off the energy shortfall of 2,393 MU from the energy surplus of 5,459 MU.

TS Discoms would state that because of the month-wise variations in the energy availability, there will be cases of surplus in few months and shortfall in few, which is an unavoidable case. The energy shortfall in certain months of the year, is expected to be procured from the short-term market. The summation of shortfall in such months' amounts to 2,393 MU. While, in other months, where there is an energy surplus, the summation will amount to 5,459 MU. These two nos. can't be compared, as they are occurring at different months of the year.

TS Discoms haven't considered the sale of surplus power, as the revenue from sale of such surplus power will be lower than the cost of the power procured from the marginal station, during that particular month i.e. procuring such excess power

		for the purpose of sale, shall be costlier and further burden the end consumer.
8	TSDISCOMs in their submissions on Relinquishment of Telangana State's share in CGS units of NTPC Ramagundam 1 and 2 and NLC units I and II claimed that the gap due to foregoing these plants could be filled by operating GENCO plants at higher PLFs	<p>Availability(MU) projections for all TSGENCO Thermal plants is shown at their Normative PLF's as per their respective PPA's. Hence there would be no additional energy available from TSGENCO plants. The contention that the TSGENCO Stations are operating below 75% PLF is not correct.</p> <p>SLDC have to issue back-down instructions to the generators for balancing the system Demand-Supply to ensure Grid security, based on descending order in the merit order despatch.</p> <p>Sembcorp Energy India Limited (Earlier Thermal Powertech) is being operated at more than 85% PLF as it is in the bottom in the merit order.</p>
9	All these factors show that 3,066 MU of surplus electricity projected by TSDISCOMs is an underestimate as well as misleading figure. Given the scope for surplus electricity available from the generation capacities available to TSDISCOMs during the ensuing year 2022-23 there will be no need to procure short term power from market at higher price.	<p>Availability shown for the FY 2022-23 is based on projections shown from long term contracts which are tied up for meeting Base-load Demand.</p> <p>Everyday 15 minutes Time-Block Scheduling of power from all the available sources is being done based on merit order and any shortage of power due to sudden outages of plants, increase in Demand etc. is being purchased through Power exchanges considering the requirement in each 15 minutes Time-Block.</p> <p>Procurement of power under Short-term (Power Exchanges) considering power shortages in certain Time-Blocks is inevitable to bridge the Day to Day Demand-Supply gap. Power will be purchased from Power Exchanges if it is available at relatively lesser price in order to lower the overall power purchase cost.</p>
10	The information related to power procurement during the years 2020-21 and 2021-22 leads us doubt whether merit order is being followed in power procurement. Variable cost of power from CSPGCL is Rs. 1.20 per unit and that of TPCIL is Rs. 2.26 per unit. If merit order was followed CSPGCL should have been	<p>Merit Order is being followed by TSSLDC.</p> <p>It may be observed that CSPGCL/CSPDCL is declaring its plant availability in the range of 37 to 52% only instead of normative</p>

	<p>preferred to TPCIL. But in fact, power at higher PLF (80 to 95%) is procured from TPCIL compared to CSPGCL (37 to 52% PLF). We request the Commission to see that merit order is followed in power procurement.</p>	<p>PAF of 76.5% due to lack of coal, whereas, TPCIL is declaring its Plant availability more than 90%.</p>
11	<p><b>4.0 రెండు రాష్ట్రాల మధ్య ఉన్న వివాదాలు</b></p> <p>రెండు రాష్ట్రాల విద్యుత్ సంస్థల మధ్య 28 అంశాలలో వివాదాలు ఉన్నాయని సమాచారం. ఇప్పటికే జరిపిన చర్చలలో కొన్ని పరిష్కారం అయినాయని చదివాము. ప్రధానంగా విద్యుత్ ఉద్యోగులు, ఆస్తులు, అప్పుల విభజన, పరస్పర విద్యుత్ పంపకాలు, ఒకరికొకరు చెల్లించుకోవాల్సిన రూ వేల కోట్ల విద్యుత్ . బిల్లుల బకాయిలకు సంబంధించిన చిక్కులను పరిష్కరించుకున్నారని తెలిసింది .వీటి మీద సమాచారం ఈ వార్షిక నివేదిక పొందుపరచలేదు. ప్రధానంగా:</p> <ul style="list-style-type: none"> <li>• ఉమ్మడి ఆడిట్ అనంతరం ఏపీ నుంచి తెలంగాణకు రూ.10,160 కోట్లు, తెలంగాణ నుంచి ఏపీకి రూ .12,650 కోట్ల బకాయిలు</li> <li>• విద్యుత్ ఉద్యోగుల విభజనతో ముడిపడి ఉన్న రూ .4,600 కోట్ల బకాయిలు.</li> <li>• పెన్షన్ల గురించిన సమస్య</li> <li>• ఆస్తుల పంపకం</li> <li>• అప్పులపై కంప్లైర్ అండ్ అకౌంటింట్ జనరల్ అభిప్రాయం</li> <li>• ఇంటర్ కార్పొరేట్ డిపాజిట్లకు సంబంధించిన ఆడిట్.</li> </ul>	<p>ఈ అంశము గౌరవ తెలంగాణ హైకోర్టు పరిధిలో ఉన్నది.</p>
12	<p>5.0 ఆర్థిక లోటు</p> <p>ఆర్థికలోటు వేల కోట్లకు చేరుతుంది అన్న అంచనాల నేపథ్యంలో, లోటు భర్తీ మీద వార్షిక ప్రతిపాదనల నివేదికలో పూర్తి స్థాయి సమాచారం ఇవ్వలేదు.</p>	<p>టారిఫ్ పెంపు ప్రతిపాదనలు, అంతర్గత సామర్థ్యం మరియు అదనపు ప్రభుత్వ సహకారంతో ఆర్థిక లోటుని భర్తీ చేయడం జరుగుతుంది.</p>

13	<p><b>6.0 లెటర్ ఆఫ్ క్రెడిట్ సమస్య (Letter of Credit issue)</b></p> <p>డిస్కంల నుంచి ఎప్పటికప్పుడు విద్యుదుత్పత్తి కంపెనీలకు బిల్లులు అందేలా ముందుగానే లెటర్ ఆఫ్ క్రెడిట్లను జారీ చేయాలని కేంద్ర విద్యుత్ శాఖ నిబంధన గురించి, దాని వలన విద్యుత్ పంపిణీ సంస్థల మీద పడే భారం గురించి చర్చ లేదు. అవసరమైన ఆర్థిక నిర్వహణలో మార్పుల గురించిన ప్రస్తావనలు ఈ వార్షిక అంచనాల నివేదిక పేజీలో ఉపయుక్తంగా ఉండేది.</p>	<p>కేంద్ర విద్యుత్ మంత్రిత్వ శాఖ జారీ చేసిన చెల్లింపు సెక్యూరిటీ మెకానిజం మార్గదర్శకాలను TS డిస్కంలు పాటిస్తున్నాయి విద్యుత్ కొనుగోలు ఒప్పందంలో ఉన్న నియం నిబంధనల ప్రకారం జనరేటర్లకు లెటర్ ఆఫ్ ను అందుబాటులో ఉన్న ఫండ్ బేస్డ్ ఆధారంగా జారీ చేయడం జరుగుతుంది.</p>
14	<p><b>7.0 విద్యుత్ ఛార్జీల పెంపు - రాష్ట్ర ప్రభుత్వ అభిప్రాయం</b></p> <p>రాష్ట్ర ప్రభుత్వ అభిప్రాయం చర్చించ లేదు. విద్యుత్ ఛార్జీలు పెంచవద్దు అని ప్రభుత్వ అభిప్రాయ నేపథ్యంలో, ప్రభుత్వం నుంచి వచ్చిన సూచనలు పరిగణనలోనికి తీసుకున్నారా? అనవసర వ్యయాన్ని తగ్గించమని సూచించినప్పుడు, ఎక్కడ అనవసర వ్యయం జరుగుతుందో గుర్తించి, ఈ వార్షిక అంచనాల నివేదిక పేజీలో ఉంటుంది.</p>	<p>డిస్కం వారు విద్యుత్ ఛార్జీలు పెంపు ప్రతిపాదనలను ఆర్థిక లోటు దృష్ట్యా సమర్పించడం జరిగింది. గౌరవ కమీషన్ వారు డిస్కం వారు సమర్పించిన ఆర్థిక వ్యయాన్ని సమగ్రంగా పరిశీలన చేసి టారిఫ్ ఆర్డర్ జారీ చేయడం జరుగుతుంది.</p>
15	<p><b>8.0 అవినీతి</b></p> <p>విద్యుత్ పంపిణీ సంస్థల్లో అవినీతి ఉన్న పరిస్థితులలో, అవినీతిని అరికట్టే చర్యలు లేవు. విద్యుత్ వ్యవస్థను ప్రక్షాళన కొరకు తీసుకున్న చర్యల గురించి ఈ వార్షిక ఆదాయ అవసరాల అంచనా (ఎఆర్ఆర్)నివేదికలో ప్రస్తావన లేదు. రైతులు కొత్త కనెక్షన్లు కావాలన్నా, ట్రాన్స్మిస్యోన్ల మరమ్మత్తులు చేయాలన్నా తమ డబ్బు ఖర్చు చేయాల్సి వస్తుంది. కొనుగోళ్లకు సంబంధించిన అవినీతి స్వయంగా ముఖ్యమంత్రి ప్రస్తావించిన నేపథ్యంలో, వివిధ రకాల అవినీతి వలన కలిగే భారం ఈ నివేదికలో ఉండాలి.</p>	<p>యాజమాన్యానికి ఎలాంటి ఫిర్యాదు వచ్చినా అనధికారికంగా సొమ్ము వసూలు చేసే సంబంధిత సిబ్బంది పై చర్యలు తీసుకుంటారు.</p> <p>ట్రాన్స్ ఫార్మర్లు కాలిపోతే SPM సెంటర్లో ఎటువంటి లోడింగ్ &amp; అన్లోడింగ్ ఛార్జీలు చెల్లించకూడదనే సమాచారంతో నోటీసు బోర్డులు SPM సెంటర్లో ఏర్పాటు చేయడం జరిగింది. ఎవరైనా లెటర్ ఛార్జీలు అడిగితే కాల్/సమాచారం ఇవ్వడానికి సంబంధిత AE, ADE/SPM &amp; DE/MRT నంబర్లు ప్రదర్శించ బడ్డాయి</p>

<p>16</p>	<p><b>9.0 సోలార్, విండ్ పాలసీ</b></p> <p>పాత మరియు ప్రస్తుత విధానం విద్యుత్ నియంత్రణ మండలి పరిధిలోకి వస్తుందా? ప్రస్తుత సవరణల గురించిన ప్రస్తావన నివేదికలో ఎందుకు లేవు? డిస్కంలను ఆర్థికంగా బాగా దెబ్బతీస్తున్న విధానం 'ఫీడ్ అండ్ టారిఫ్'. ప్రకృతి సహకరించినప్పుడు మాత్రమే పవన, సౌర విద్యుత్ ఉత్పత్తి అవుతుంది. ఆ సమయంలో ధర్మల్ ప్లాంట్ల ఉత్పత్తి సామర్థ్యాన్ని తగ్గిస్తారు. సామర్థ్యాన్ని తగ్గించినప్పటికీ పూర్తిస్థాయి</p> <hr/> <p>ఉత్పత్తికి అవసరమయ్యే బొగ్గును వాడాల్సి ఉంటుంది. ఫలితంగా యూనిట్కు 30 పైసల వరకు నష్టం వస్తోంది. ఇది నెలకు రూ.10 వేల కోట్ల వరకూ ఉంటుందని అంచనా. ఈ సమయంలో విద్యుత్ పంపిణీ సంస్థలు అధిక రేటుతో మార్కెట్లో విద్యుత్ తీసుకోవాల్సి వస్తోంది.</p>	<p>రెగ్యులేషన్ నెం.1 2014 ప్రకారం, గత APERC వారు జారీ చేసిన లైసెన్సీలు, రెగ్యులేటరీ ప్రొసీజర్స్, అన్ని రెగ్యులేషన్లు, నిర్ణయాలు, ఉత్తర్వులు, తెలంగాణ రాష్ట్ర విద్యుత్ నియంత్రణ మండలి ఏర్పాటైన నుండి తెలంగాణ రాష్ట్రంలోని విద్యుత్ వ్యవస్థలోని భాగస్వాములందరికీ వర్తిస్తు మార్పు చేయు వరకు లేదా కొత్తవి జారీ చేయు వరకు అమలులో ఉంటాయి. కొత్తగా రాష్ట్ర నియంత్రణ మండలి జారీ చేసిన రెగ్యులేషన్లు వర్తిస్తాయి</p> <p>సౌర మరియు పవన విద్యుత్ కేంద్రాలు తప్పనిసరి కేంద్రాలు. తప్పనిసరి హోదా కారణంగా ధర్మల్ విద్యుత్ కేంద్రాలను బ్యాకింగ్ డౌన్ చేయాల్సి ఉంటుంది. RPPO బాధ్యత పూర్తి చేయుటకు డిస్కంలు సాంప్రదాయేతర ఇంధన వనరుల నుండి విద్యుత్ ను కొనుగోలు చేయాల్సి ఉంటుంది. ఒక వేళ కేంద్ర ప్రభుత్వం చే నిర్వహించిన గరిష్ట RPPO బాధ్యతను పూర్తి చేయనట్లయితే చెల్లించాల్సి ఉంటుంది. పైన పేర్కొన్న అంశాలను పరిగణించి డిస్కంలు సగటు విద్యుత్ కొనుగోలు వ్యయం తగ్గించుటకునిరంతరం కృషి చేయడం జరుగుతుంది.</p>
<p>17</p>	<p><b>10.0 ఉన్న అప్పులు, కట్టాల్సిన వడ్డీ</b></p> <p>ప్రైవేట్ విద్యుత్ కొనుగోళ్ల వల్ల అప్పులు పెరిగి, అప్పులకు ఏటా కడుతున్న వడ్డీ సమాచారం స్పష్టంగా లేదు. వడ్డీ కోసం కూడా అప్పులకు చేసినట్లు సమాచారం. రోజువారీ ఖర్చులకు కూడా అప్పులు అయినట్లు తెలుస్తుంది. ఇవన్నీ ఈ నివేదికలో చెప్పాలి. ఈ అప్పుల వల్ల ప్రత్యక్షంగానే పరోక్షంగానే విద్యుత్ ఛార్జీల భారం ప్రజలపై పడింది. ఆ భారం గురించిన ప్రస్తావన లేదు.</p>	<p>గౌరవ కమీషన్ వారు విద్యుత్ కొనుగోళ్ల కోసం తీసుకున్న రుణాల పై వడ్డీ భాగాన్ని అనుమతించదని పేర్కొనడం జరిగింది.</p>



## 11.0 వ్యవసాయ విద్యుత్ సమస్యలు

వీటి పైన స్పష్టమైన సమాచారం లేదు. ఇవ్వాలి అవసరం ఉంది:

11.1 రాష్ట్రంలో లక్షల రైతు కుటుంబాలకు ఉచిత విద్యుత్ అందిస్తున్నట్లు ప్రభుత్వం చెబుతుంది. ఈ సంఖ్య పెరిగిందా?

11.2 వ్యవసాయానికి 24 గంటల ఉచిత విద్యుత్ అందిస్తున్నట్లు చెప్పినా, సరఫరాలో అవంతాలు వస్తున్నాయి.

11.3 వ్యవసాయ ఫీడర్ల పర్యవేక్షణ జరుగుతుందా?

11.4 వ్యవసాయానికి ఉచిత విద్యుత్ కనెక్షన్లలో జాప్యం. విద్యుత్ శాఖ కార్యాలయాల చుట్టూ తిరుగుతున్నా కనెక్షన్లు మాత్రం మంజూరు కావడం లేదు అని రైతులు చెబుతున్నారు. అర్హులైన రైతులు ఉన్నప్పటికీ కొత్త వారికి కనెక్షన్లు మంజూరు చేయకుండా వేధిస్తున్నారు. దరఖాస్తు చేసుకుని ఏళ్లు గడుస్తున్నా విద్యుత్ కనెక్షన్ రాకపోవడంతో బోరుబావులను నిరుపయోగంగా ఉంచుకోవాల్సి వస్తోంది. వ్యవసాయానికి విడుదల చేసిన విద్యుత్ కనెక్షన్ల వివరాలు జిల్లాలవారీగా, గత 7 సంవత్సరాలలో ఇచ్చిన వివరాలు TSERC అడగాలి.

పెరిగింది. తెలంగాణ రాష్ట్రం ఏర్పడినప్పుడు మార్చి 31, 2014 వరకు విద్యుత్ వ్యవసాయ సర్వీసులు 9,78,815 ఇప్పుడు 2020-21 వరకు 12,02,763. ప్రభుత్వ ఆదేశానుసారం వ్యవసాయ రంగానికి 24 గంటల నిరంతర ఉచిత విద్యుత్ సరఫరా చేస్తున్నాము లైన్ ట్రిప్పింగులు, బ్రేక్ డౌన్లు మరియు లైన్ల నిర్వహణ కారణంగా అప్పుడప్పుడు మాత్రమే ఈ సాంకేతిక అంతరాయాలు ఏర్పడుతున్నాయి. లైన్ల నిర్వహణ చేసినప్పుడు రైతులకు ముందస్తు సమాచారం ఇవ్వబడుతుంది. లైన్ ట్రిప్పింగులు మరియు బ్రేక్ డౌన్లు తగ్గించడానికి సంస్థ ప్రత్యేక నిర్వహణ కార్యక్రమాలు ఎప్పటికప్పుడు చేపట్టడం జరుగుతుంది.

మా సిబ్బంది తరచూ వ్యవసాయ ఫీడర్ లను పర్యవేక్షించడం జరుగుతుంది మరియు పర్యవేక్షణలో భాగంగా పాడైపోయిన ఇన్సులేటర్లు, కిందికి వేలాడుతున్న తీగలు ఉన్నట్లయితే వాటిని ఎప్పటికప్పుడు సరిచేయడం జరుగుతుంది.


వ్యవసాయ విద్యుత్ కనెక్షన్ ఇవ్వడం కోసం ఎటువంటి స్థలాలు మరియు విద్యుత్ పరికరాల అవసరం లేకపోతే వెంటనే కనెక్షన్ ఇవ్వడం జరుగుతుంది. ఒక వేళ ట్రాన్స్ఫార్మర్ వేయడానికి సరైన స్థలం లేకపోయినా లేదా స్థలాలు సమయంలో పంట పొలాలు ఉండడం వలన విద్యుత్ కనెక్షన్ ఇవ్వలేకపోతున్నాము. ట్రాన్స్ఫార్మర్ వేయడానికి సరైన స్థలం దొరికిన వెంటనే మరియు స్థలాలు వేయడానికి పంట పొలాల కోతలు అయిపోయిన వెంటనే సంస్థ తరపున విద్యుత్ కనెక్షన్ ఇవ్వడానికి అవసరమైన పని చేసి కనెక్షన్ ఇవ్వడం జరుగుతుంది.

		<p>వ్యవసాయ విద్యుత్ కనెక్షన్ల విడుదలలో FIFO (ఫస్ట్-ఇన్-ఫస్ట్-బౌట్) పద్ధతిని పాటిస్తున్నాము</p>
19	<p>TSERC, Govt. and Process</p> <ol style="list-style-type: none"> <li>1. TSERC, to facilitate its work, should review the ARR document structure and content. Standardisation of ARR proposals will help in understanding the issues and challenges correctly. As part of this, it can consider focusing on 3-year thumb rule, Balance sheet and establishing financial principles for ARRs</li> <li>2. The major regulatory functions of TSERC, like other ERCs, are licensing, setting tariffs, ensuring maintenance of service standards and promoting competition in the sector, and more coming from Electricity Act, 2003. However, TSERC is facing problems in performing its basic functions. A thorough review is needed.</li> <li>3. Political interference has adversely affected the quality of regulation. Decisions relating to tariffs and investment have been highly influenced by political interests. A review shows that the regulatory system in this sector lacks independence, accountability, transparency and stakeholder participation. A regulator needs independence from the government to discharge its functions in a free and transparent manner. This is possible, only when TSERC becomes more transparent, accessible and accountable, in its communications, processes and outputs.</li> </ol>	<p>TS Discoms shall abide by the instructions given by the Hon'ble Commission.</p>



4. There are no official consultative mechanisms between government and ERC to issue appropriate policy guidelines. Albeit, there are overlaps in the respective jurisdictions of the government and regulators. For example, ERCs are empowered to fix tariffs for end users but the government has not allowed them to determine tariff at their discretion. Consultative mechanisms should be put in place.
5. An important aspect of regulatory independence is financial independence. Dependence on uncertain budgetary allocations reduces the independence of regulatory bodies. ERCs depend upon state exchequers for funds. The lack of financial independence also leads to problems relating to quality and capacity of personnel. As per Electricity Act, 2003, based on a verification process, TSERC should augment its financial resources, through other means, and not just depend on public exchequer.
6. TSERC should cause deliberate actions to promote public participation in its regulatory functions. First and foremost is the language. Telugu language based documents would greatly enhance participation. All documents should be necessarily brought out in Telugu.

**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by Sri Devulapalli Venkateshwar Rao, H.No.13-2-176, Devulapalli Sahithya Sadan, Warangal.**

Sl. No.	Summary of Objections / Suggestions	Response of the Licensee
1.	<p><b>Non-Tariff Income:</b> the Licensees can explore the possibilities of increasing Non-Tariff Income by</p> <p>(a) Collecting Royalty Payment yearly from the agencies using the distribution poles for their publicity and mainly from the cable agencies supplying T.V Channels to their consumers by giving connection erecting cables on electric distribution poles at all places.</p> <p>(b) The Licensees can also examine the Non-Tariff Income in the form of Royalty Payment from Municipalities and Corporations for using Distribution Poles (supports) for street-lighting purpose. As the Municipalities and Corporations are collecting lighting CESS along with Property Tax.</p> <p>(c) Further, the Licensees can examine collecting Royalty Payment from Endowments Department as in the Endowment controlled temples exorbitant charges are being collected from devotees for every type of worship but the Licensees are charging CC charges under special concessional rate and from Wakf Board and Christian Missionaries maintaining Churches with Foreign Funds.</p>	<p>a&amp;b) Suggestion is noted.</p> <p>c) The subject doesnot pertain to Discom.</p>
2.	<p><b>Registration of applications for new connections:</b> The mee-seva centers have been entrusted the work of Registration of applications for new connections. The Centers are registering applications and collecting charges of Deposits and Development Charges basing o the load proposed by prospective consumer in the application. In certain cases, the applications are being rejected basing on technical issues after forwarding to concerned distribution centers. The Licensees should give clear instructions to mee-seva centers not to collect deposits prior to approval of Technical Feasibility from concerned Distribution.</p>	<p>TSNPDCL facilitated consumer online registration of new service connetion through TSNPDCL web portal. It has not tied-up with mee-seva centers for this matter. Further, the reasons for rejection of applications can be viewed under LT Service Registration  "Application status" in the web portal and can also contact concerned field officers for further clarification.</p>
3.	<p><b>Examination of extension of power supply to Domestic Services up to two poles at Licenses cost:</b> The Licensees should examine the aspect of extending power supply to Domestic</p>	<p>Discoms are duly adhering to the regulations that are issued by the Hon'ble Commission in this regard.</p>

	<p>Services up to 2 Pole extension to prospective consumer at Licensees Cost as the prospective consumer will become a permanent consumer of Licensee and with additional revenue for long period.</p> <p>If the entire cost of extension of poles and lines are being collected from prospective consumer (cost of poles, lines and labour for erection), the entire material will become the property of prospective consumer and will become owner and the Licensee cannot use the same lines for extending supply to any other than entire cost paid by prospective consumer. If any, deviations may attract legal complications.</p>	
4.	<p><b>Meter Readings:</b> The Licensee may examine: Entrusting the contract of taking monthly readings to Retired Department Staff. Due to irregular meter readings and billing exorbitantly attracting many legal complications. As the readings are being taken by uneducated personnel. There is immediate necessary to revamp the billing system to avoid complications to consumers.</p>	<p>Currently TS Discoms bills the consumers on a 30 days billing cycle.</p> <p>Metering readings are captured through IRDA communication, and not entered manually</p>
5.	<p><b>Recording of M.D in Meters:</b> There is a system created and option setup in new meters for recording M.D basing on consumption by consumer. The Development Charges and ACDs are being calculated and intimated to consumer through monthly CC bills. But, the consumers are not aware of the same and many complaints are being received. So consumer awareness should be created by establishing department staff effectively about their additional connected load than the sanctioned load.</p>	<p>TS Discoms notes the suggestion given by the objector and would further work on creating the awareness about the current billing methodology to the consumers.</p>

**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by Sri E.Srinivasa Chary, Energy Conservation Mission, IEITSC Hyderabad.**

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>Agriculture Tariff &amp; related issues</p> <p>Agriculture in Telangana State is mostly depends on electricity run pump sets and lift irrigation schemes. The share of consumption by Agl sector is 38.16% as per actual consumption during FY 2021-21. Hence, it needs focused attention for betterment of discoms</p> <p>A) Estimation of agriculture consumption</p> <p>Both discoms have shown that, agricultural consumption for FY-2022-23 will fall on account of rise in Canal-based cultivation, owing full-fledged operations of the LI schemes The LI schemes consumption in TSSPDCL area rises by 190% (1830 to 5325 MU) and TSNPDCL area rises to 246%. (2452 to 8501 MU). Both discoms put together 3575 MU recorded during FY 2020-21. When we look at pervious consumption pattern of LI schemes with respect to their capacity, the figures shown are very high side, which is nothing but exaggeration. Discoms may obtain details like number of new LI schemes coming into operation with their capacities and hours of run from irrigation department and estimate the consumption in a scientific method instead of requesting commission for true-up exercise later.</p> <p>In our view, owing to increase of irrigation lifts, individual motors may reduce along the canal for whom water flows by gravitation but, these water may not flow continuously in all seasons, moreover, while flowing the ground water table rises, hence, there is a scope for recharge of defunct bore wells and increase of new connections. Owing to abundant availability of water and motors backup farmers may prefer more area and 2 or 3 crops in a year. Further, history revealed that annual agricultural specific energy consumption of individual pump set per HP keeps increasing. Ultimately there is a scope for consumption rise or at the most stable but wouldn't decrease in any case.</p>	<p>TS Discoms would like to state that the assessment of agricultural consumption is done every month, as per the ISI methodology, approved by the Hon'ble Commission and the same are submitted to the Hon'ble TSERC. For this purpose, the sample for each capacity (i.e., kVA rating) is chosen using random sampling procedure. The consumption of each of these sample DTRs are measured each month. The average consumption per DTR is then estimated from the total consumption of all the sample DTRs in each circle. The average DTR consumption of each capacity of the DTR population is the basis for extrapolation of the agricultural consumption.</p> <p>TS Discoms are expecting that the sales of agriculture category will decrease with upcoming LIS Loads as these two are complementary things, i.e. Increase in LIS consumption would provide easy accessibility for water and help agriculture consumers to pump the water by consuming a lesser amount of energy.</p> <p>Projecting LIS sales consist of a high amount of unpredictability, availability of water is an important factor. However, LIS sales are projected by considering the current pumping stations loads on Krishna &amp; Godavari river and any upcoming additional loads. These loads are further considered to be operating only at a 60% load factor. Thus, if all conditions work fine LIS loads would generate the projected LIS Sales consumption and would also affect the agriculture sales causing it to decrease marginally.</p>

	Hence, abnormal consumption projection on lift irrigation schemes and reduction of consumption on individual motors may be reviewed/ reconciled for factual determination of tariff and government subsidy.	
2	<p>Replacement of energy efficient motors in agriculture sector.</p> <p>It is well known fact that, all most all motors running in agriculture sector are inferior, local made and inefficient causing 30 to 40% more consumption. Since electricity supply to agriculture is free, farmers are not interested to use energy efficient motors as these costs more. Any saving in energy under subsidized category is advantage to the discoms. As savings of energy not only reduces the expenditure on power purchase, but results indirect budget spent on distribution network, generating plants ultimately leads to reduction in carbon emissions.</p> <p>Recognizing the fact, Hon'ble commission has directed to replace 10% existing agriculture pump sets with energy efficient every year, as stipulated in UDAY, MoU. But, no discom has taken up this matter on a plea that shortage of funds.</p> <p>Whereas there is opportunity for substantial savings on Agriculture pump sets, with ESCO companies Example: M/s. EESL as taken up such projects without upfront investment to discoms,</p> <p>Pilot projects were implemented at Maharastra, Karnataka, Rajasthan and states like AP, Uttar Pradesh have replaced 74,000 conventional pump sets with help of M/s EESL.</p>	TS Discoms are not in a position to comment on the inefficiency of the pumps used for agricultural purposes. However, TS Discoms notes the suggestion made by the objector to loop in ESCO companies to help improve the energy efficiency for agricultural pumps.
3	<p>INCENTIVES TO FARMERS FOR USING LESS ELECTRICITY</p> <p>Punjab State Power corporation limited (PSPCL) has introduced an innovative financial incentive scheme for the farmers in the name of "Paanibachao-Paisakamao". The concept of the scheme was, if a farmer consumes less energy than a particular pre-decided limit for the crop he or she will be incentivized.</p> <p>For example, the supply limit of a farmer is fixed at 1,000 units per month according to HP capacity of the pump set and if the farmer consumes 800 units</p>	TS Discoms are already providing 24/7 free power to agriculture consumers, in line with the Govt. of Telangana directives.

	<p>for the difference of 200 units less consumption an amount of Rs. 800 (at the rate of Rs 4 per unit) will be credited to farmer account.</p> <p>This scheme was taken up on pilot basis after conducting prior critical study and implemented to the farmers coming forward voluntarily for installation of meters and participation in the scheme. No charges or penalties in case of excess consumption. This type of schemes motivates the farmers to buy energy efficient pumps, avoiding of auto starters and practice or grow less water consuming dry crops which not only saves the energy but reduces the threat of depletion of groundwater levels in the area. Earlier, tariff orders Non-DSM agriculture tariff exists. But as per policy of government supply was made free to all. Hence, in place of Non-DSM agriculture tariff an incentive scheme may be planned for the farmers following DSM measures so as to tap the saving potential in the sector.</p>	
4	<p>Implementation DSM measures and inspections</p> <p>In the above context, discoms shall strictly ensure DSM measures and meters for newly released services. Regular vigilance being conducted for metering services, but agriculture connections are neglected as the power supply is free. But intensive inspections are carried out on agricultural pump sets, unauthorized Agl connections, additional load auto starters will come to know, besides check on DSM measures followed by farmers, which will help to control consumption on Agl pump sets</p>	<p>Instructions issued to the field officers to release agriculture services with the consumer follows DSM measures such as ISI pump sets, frictionless footwall, capacitors, monoblock sets and HDPE/RPVC pipes.</p>
5	<p>Electric vehicle charging Tariff</p> <p>Electric vehicles are pollution free compared to IC engine based vehicles. In view of various advantages and the commitments at Cop-11, held at Paris, Electric vehicles in the country are being encouraged at Center and State level. EV sector is at budding stage and it is the future hope for power sector for betterment of their financial status. More purchases more will be the demand thus revenue to discoms. People need to be motivated for opting Electric Vehicle.</p>	<p>The last tariff hike in the state was approved by the Hon'ble Commission in FY 2016-17. It has been five years now since the last tariff hike, but in the said duration, all the costs incurred by TS Discoms in terms of Power purchase cost, Transmission and Network cost etc. have increased significantly, leading to a constantly increasing revenue gap.</p> <p>Hence, TS Discoms believe that the proposed tariff hike is inevitable and justified to improve its financial condition and</p>

<p>In the proposed tariff, rates are increased by Rs. 1 per unit. When we look at the previous or present financial year consumption in the EV category, TSNPDCL records nil and TSSPDCL records negligible i.e., about 2 MU. In the above context increase in tariff is absurd.</p> <p>Hence, Hon'ble commission may examine tariff for supply of electricity to EV stations at average power purchase cost of Rs. 4.68 or continue present tariff as it is constant as an encouragement for new buyers. It is pertinent to mention here that companies like "Fortum" a private operator gave free of cost EV charging for one year to attract consumers. (Like Reliance Jio telecom at the beginning)</p> <p>Installation of, EV charging stations are in slow rate to build confidence on availability among the new buyers abundant stations need to establish everywhere.</p> <p>Since, EV tariff is beneficial, discom's may plan to establish charging stations at all 33/11 KV Sub-Stations, offices where assured power, place and 24/7 manpower is available, which will boosts EV adoption in larger scale leading to additional income to the discoms.</p> <p>(Like petrol bunks run by IOCL, BPCL etc.)</p> <p>Further use of EV within discom may be made mandatory so as to minimize the expenditures on officer travels, besides an example to public.</p> <p>In this regard Hon'ble commission may clarify provisions to run own EV stations by discoms.</p>	<p>better customer service and accordingly request the Hon'ble Commission to approve the same after due regulatory proceedings.</p> <p>Under Telangana EV &amp; ESS policy 2020-30, TS has already committed to to attract investments worth \$ 4.0 Billion and create employment for 120,000 persons by year 2030; Generate demand for battery storage solutions by driving EV adoption incentives and supply side incentives for battery manufacturing; To proactively support creation of EV charging Infrastructure in the initial phase and eventually create market for commercially viable EV Charging business.</p> <p>In addition to above TS have provisions for huge demand side incentive, Charging infra. incentives and EV manufacturing incentives.</p> <p>Ministry of Power guidelines dated 14 Jan 2022, clause 7.1 quotes " The tariff for supply of electricity to Public EV Charging Stations shall be a single part tariff and shall not exceed the "Average Cost of Supply" till 31st March, 2025". TS Discoms want to state that the current proposed Energy charges for EVs category Rs. 7.00/unit is less than the ACoS (Rs. 7.10/unit for TS Discoms). TS Discoms have proposed Fixed charge for this category on par with other categories. Also, other states in the country have also proposed fixed charges for EV category like Karnataka, Gujarat, MP, Haryana, Rajasthan, Maharashtra etc.</p> <p>Having said that, TS Discoms make note of the references shared by the objector on the tariffs for EV, and shall abide by the directions given by the Hon'ble Commission, as it deems fit.</p>
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<p>6</p>	<p>Green power tariff for industrial and commercial consumers</p> <p>Reduction in use of fossil fuel is need of the hour to reduce the carbon emissions and healthy atmosphere for society. The State &amp; Central government's are striving for increasing renewable power generation to meet the growing demand with clean and safe green energy.</p> <p>Many states have started Green Power tariff long back and was available in TSDISCOMs during FY 2015-16. The reasons not known but was discontinued subsequent tariff orders.</p> <p>It is highly appreciable that, now few consumers are coming forward to use green power. Accordingly, discoms proposals for green power tariff for FY 2022-23 is INR 2 per KWH over and above the retail supply tariff for the commercial and industrial, which is found to be discouraging.</p> <p>In the tariff proposal discom's said that tariff for green power is arrived in the lines of MERC order dated 22.03.2021. In such case 50% of the difference between the cost of RE</p> <p>&amp; Non-RE sources worked out to be INR 1.685 per unit (3.37x0.5). When we look at Karnataka Green tariff is Rs. 0.50 per KWH over and above existing tariff and in case of AP it was flat Rs. 12.25 per KWH, no demand or fixed charges.</p> <p>Presently, green power is available at lowest price below Rs. 3 per unit against earlier purchase cost of about Rs. 10 per unit Recently commission has ordered green power tariff for excess over generation by individual consumer supplying to discom at Rs.4.32 per unit whereas consumers coming forward for green power is charged high. However, considering the back down costs of thermal power, it can be increased, but may be limited to Rs. 1 to 1.685 per unit over and above the existing tariff. Since fixed/Demand charges compulsory for the consumers.</p>	<p>TS Discoms have done a detailed study to capture the existing green tariff models in India, namely Maharashtra, Karnataka, AP and Gujarat, and analysed the basis of levying such charge, if available.</p> <p>TS Discoms have proposed the Green Tariff for Telangana, in line with the methodology followed by MERC in its order dated 22.03.2021, to arrive at the additional premium of INR 2.00/kWh, over and above the existing retail tariffs of the C&amp;I consumers.</p> <p>TS Discoms would like to clarify that such charge was arrived at by considering only 50% of the difference of the cost of RE sources and the non-RE sources (variable part).</p> <p>TS Discoms are expected to face various RE integration issues, when they procure RE beyond their RPO targets. RE being given the Must-Run status, is scheduled despite leading to backing down of conventional generators and payment of higher fixed charges. Sometimes, Discoms are forced to sell power at cheaper rate to ensure Must Run status of RE. Also, the variability and unpredictability of RE generation contributes to deviations leading to payment of penalties for violation of operating limits, under the state's Deviation Settlement Regulations.</p> <p>Also, it is pertinent to mention here that the TS Discoms are most suitably placed to meet the 100% RE procurement objective of the interested consumers and the below challenges need not be faced by consumers -</p>
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	<p>In the above context, Hon'ble commission may examine the green power tariff in the larger interest of the society and the Nation.</p> <p>Further, it is not specified, whether a consumer can opt any share (partial) of their consumption under green power tariff or not. It is also requested minimum period for opting or with drawing green power tariff shall be specified so as to motivate many consumers for this concept.</p>	<ul style="list-style-type: none"> <li>● Imbalance settlement charges – No additional cost of storage solutions which will have to make such RE procurement RTC power and consumable</li> <li>● Banking and consequent charges which will impact the RE capacity to be sourced</li> <li>● Easy and quick scale up of energy requirement by consumer when sourcing RE from Discom</li> <li>● No development related risks and costs to the consumers</li> </ul> <p>Having said that, TS Discoms shall abide by the instructions given by the Hon'ble Commission, if it deems fit to revise the charge.</p>
7	<p><b>33KV OR 11KV LINE LOSSES</b></p> <p>It is the most important aspect of the discoms need to concentrate. Though the line losses are less compared to many other states and the nation's average but need to strive hard to reduce bearest worlds minimum as low as 4 to 5% which is far away from our present status.</p> <p>Discoms are stating that, regular energy audit being done at corporate office level and measures like erection of new 33/11 KV substations, 33KV, 11KV lines and capacitor banks are installed at overloaded feeders.</p> <p>Recent 11KV feeder wise energy audit put on public domain revealed that the individual feeder losses are varying from 5% to 35% especially in the same area and consumer mix, the variations are abnormal, that means there is a specific problem in the area like rampant theft, metering issues etc, special task force with police personal shall be formed to handle problematic areas. Particularly colonies in rural areas, Slums, sensitive areas in towns these problems are much. In such areas Distribution Transformer wise energy audit shall be conducted to know the pit falls. However, Discoms shall come out with concrete plan to curb or minimize the commercial losses to same level in the</p>	<p>Following steps taken for reduction of losses :</p> <ul style="list-style-type: none"> <li>● Energy audit is brought online and losses are being calculated on monthly basis. Energy audit of all EHT services is being done through online. Similarly, Energy audit is being done Jurisdiction wise for effective monitoring.</li> <li>● Identification of high loss feeders is done for attending exceptional, booking of theft cases, replacement of old Mechanical meters, segregation of overloaded 11KV feeders etc.</li> <li>● Every month intensive inspections are being conducted by</li> <li>● operation wings and DPE wing to minimize the theft / Direct Tapping/ Unauthorized usage of power supply to reduce the losses.</li> </ul>

	<p>same town. It was noticed from the M/S CESS, tariff Appendix 3 form 3.2 that 11 KV line loss are increased in the year 2021-22 from 9.9 to 10.8, whereas shown less for FY-2022 to 23. without mentioning action plans to reduce.</p>	<ul style="list-style-type: none"> <li>• To improve the billing and to minimize the losses the monthly targets are fixed to replace the non IR port meters with IR/IRDA port meters in this regard strict instructions are issued of officer concerned to take action accordingly.</li> <li>• Regular maintenance of feeders and LT lines, DTRs and RMUs etc are being carried out for minimizing of breakdowns and interruptions to minimize the losses and improve the sales.</li> <li>• Erection of new sub stations to provide reliable and quality of power supply to the consumers, and reduction of technical losses.</li> </ul>
8	<p>Discount tariff or incentives for Energy efficient projects</p> <p>Many organizations, including government bodies are planning for energy efficient projects to reduce their power consumption thus expenses on bills. Energy efficient projects taken up by the Commercial and Industrial consumers may affect the revenue, hence Discoms may not show interest. But this type of projects need to be encouraged in the larger interest of nation and as for BEE guidelines in line with the Energy conservation act-2003. As such some discount in tariff or incentives are given to the consumers implemented proven energy efficient projects. Which, not only helps the EE projects more viable and also motivates the other consumers. For example, MuDSM, programs like energy efficient street light projects being implemented in Municipalities &amp; Grama panchayats.</p> <p>Loss of revenue to Discoms due to implementation of energy efficient projects need to be compensated elsewhere.</p>	<p>TSNPDCL shall abide by the orders of Hon'ble TSERC &amp; Govt. of Telangana.</p>
8	<p>TIME OF THE DAY TARIFF</p>	<p>Suggestion is noted.</p>

	<p>Owing to non-availability of all categories of the power generation round the clock but demand varies abnormally in the morning and evening peak hours, for management of grid TOD tariff is being implemented in HT category. However, owing to increased penetration of renewable power like Solar, which is only available in the day time, grid management becoming difficulties are increasing. But as a policy RE power is being encouraged.</p> <p>To handle the problem ToD tariff need to be extend for LT categories also. From the available data the maximum demand in LT industrial and commercial consumer put together is in the considerable range of several 1000 MVA's. Discoms shall workout on TOD tariff for high consumption industries and commercial consumers Hence, if TOD tariff is imposed, discoms can maintain peak load easily, besides getting additional revenue.</p>	
9	<p><b>AADHAR CARD LINKAGE TO CONSUMER SERVICES</b></p> <p>Primarily all public or private organizations are collecting Aadhar card for details for any service. Example: Telecom sector, LPG cylinder, Banking Income tax etc.,</p> <p>If Discom updates consumer details by linking Aadhar card number of connections on single person are known, data will be most useful for identification of persons in case of default of bill payments which will reduce or the eliminate debts of consumers.</p>	TS Discoms notes the suggestion given by the objector to link Aadhar card with Consumer services.
10	<p><b>SMART METERS:</b></p> <p>Installation of smart meters will help discoms for effective monitoring of consumptions and revenue, so as to reduce the AT&amp;C losses. Presently smart (prepaid) meters are being installed for government services spread over entire Telangana, some places communication becoming a problem and obligatory to disconnect government public servicing organization. Hence, for effective utilization, performance evaluation, the smart meters need to be installed at the cities and towns for high value or consumption consumers in particular for Industrial and commercial consumers. All new connections at cities may be given with prepaid meters only. Further, consumers shall be</p>	TS Discoms are preparing a scheme for installation of smart meters in a phased manner.

	<p>allowed to procure prepared meters from the open market at their own cost, later these amount can be returned on installment basis through power consumption bills. So, that initial expenditure burden on discoms is relived.</p>	
11	<p>RESEARCH AND DEVELOPMENT CENTER AT DISCOM LEVEL.</p> <p>Research and development is a priority focus area in the power sector with the a mission for providing affordable quality power to each strata of the society as mentioned in the Ministry of power website.</p> <p>Regular researches need to be conducted to develop better systems and adopting worldwide latest technologies in the field of power distribution. At national level under Ministry of power autonomous bodies like Central power research institute (CPRI), NTPC energy technology research alliance(NETRA) are exists. Similarly, at least an in house exclusive R&amp;D center need to be established at Discom level. It is needness to mention here that the expenditure incurred for maintenance of R&amp;D is exempted from taxes. VIII). Finally we respectfully submit to the honorable commission that, our only intention is to encourage the renewable energy, use of energy efficient equipment or appliances and conservative methods to save energy, by making involvement of everyone in the nation's good cause of protecting environment.</p>	<p>Suggestion is noted.</p>

**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by Sri I.Gopinath, South Indian Cement Manufacturers' Association, 3rd Floor, 36th Square, Plot no. 481, Road no.36, Jubilee Hills, Hyderabad-500034 & Sri Anil Agarwal, Sr Vice President,FTCCI, Federation House, Federation Marg, 11-6-841, Red Hills, Hyderabad - 500004**

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>STATEMENT OF OBJECTIONS</p> <p>The Distribution Licensees namely Southern Power Distribution Company of Telangana Limited and Northern Power Distribution Company of Telangana Limited (hereinafter referred to as the 'Discoms' or 'TS Discoms' or 'Petitioners' or 'distribution companies' or 'Licensees') have filed the Petitions for the determination of the Aggregate Revenue Requirement (ARR) for the Retail Supply Business for the year FY 2022-23 in accordance with the erstwhile Andhra Pradesh Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff for Wheeling and Retail Sale of Electricity) Regulation No.4 of 2005 and its First Amendment notified in 2014 namely Regulation No. 1 of 2014 (hereinafter collectively referred to as 'Tariff Regulations').</p> <p>The Objector also prays that it may be permitted to make additional submissions specific to these Petitions, in the Public Hearings as per the Public Hearing schedule announced by this Hon'ble Commission.</p> <p>The brief facts, propositions, analysis, grounds and point wise objections to the Petitions are narrated herein below:</p>	No Comments
2	<p>DELAY IN FILING THE RST PROPOSAL FOR FY 2022-23</p> <p>2 DELAY IN FILING THE RST PROPOSAL FOR FY 2022-23</p> <p>i. As per regulation 4 of 2005 (Terms and Conditions for Determination of Tariff for Wheeling and Retail Sale of Electricity), the distribution licensees were to file their ARR and tariff proposals for FY 2022-23 on or before 30.11.2021, so as to make available to the Commission, the statutory time of 120 days for determination of Tariff for FY 2022-23 commencing 01.04. 2022.</p> <p>ii. The relevant extract is as follows:</p>	<p>TS Discoms would like to state that they have been filing the ARR petitions, on an annual basis, before the Hon'ble Commission (TSERC) until FY 2018-19. From FY 2019-20 onwards, the Discoms have not filed the ARR petitions before the Hon'ble TSERC, due to the following reasons –</p> <p>Enforcement of Model Code of Conduct in the State of Telangana in view of elections for Telangana Assembly.</p>

<p><b>"6 FILING PROCEDURE</b></p> <p>6.1 Every Distribution Licensee shall file for each of its licensed business an application for approval of its Aggregate Revenue Requirement (ARR) for each year of the Control Period, not less than 120 days before the commencement of the first year of the Control Period. This filing shall be in such form and in such manner as specified and in accordance with the Guidelines issued by the Commission. The Distribution Licensees may file such applications for ARR of the first Control Period within a period not less than 90 days before the commencement of the Control Period."</p> <p>iii. However, both Licensees had prayed to the Hon'ble Commission to allow the licensees to file Tariff Proposals at a later date.</p> <p>iv. The Hon'ble Commission vide its letter Lr. No. L-1/8 – B/Secy/JDLAW01/D.No. 572/2021 dated 02.12.2021, has directed both licensees to file the proposed tariffs within a period of seven days from the date of receipt of the letter.</p> <p>v. Further, the Hon'ble Commission, through its Notice O.P. (SR) No. 79 of 2021 dated 14.12.2021, called for hearing of admission of the Aggregate Revenue Requirement for Retail Supply Business for FY 2022-23. And during the course of the hearing, the Hon'ble Commission orally directed both Licensees to file its Retail Supply Tariff proposal for FY 2022-23 on or before 27.12.2021.</p> <p>vi. Subsequently, the Retail Supply Tariff proposals for FY 2022-23 have been filed on 27.12.2021 by both Licensees.</p> <p>vii. The reason submitted by the Licensees for the delay is the enforcement of Model Code of Conduct in view of the Biennial elections of Telangana Legislative Council Seats.</p> <p>viii. The Objector would like to bring to the notice of the Hon'ble Commission that the Licensees have displayed a consistent delay in filing Retail supply Petitions from the period 2018-19 to 2020-21, subsequently seeking of extension of the previous tariff order for the ensuing year by the Hon'ble Commission. The Interlocutory Applications filed by the TS Discoms and Hon'ble Commission's Orders regarding the application for extension of tariff has been summarised below in the table:</p>	<p>Hon'ble TSERC was not operational from 9th Jan 2019, after the Chairman of Hon'ble TSERC demitted office after attaining the age of 65 years.</p> <p>Enforcement of Model Code of Conduct in the State of Telangana from 10.03.2019 till 23.05.2019 (Lok Sabha election).</p> <p>Pending information from ICAD department on Lift Irrigation (LI) schemes.</p> <p>Issuance of model code of conduct for the Municipal elections from 23.12.2019 to 25.01.2020</p> <p>Further extension in view of preparation of tariff proposals in accordance to the MoP recommendations on Tariff Rationalisation process.</p> <p>Due to imposition of Lockdown in the State by GoTS due to spread of pandemic COVID-19, which impacted the consumption of electricity by various sectors, the licensees intended to file ARR duly including the impact of lockdown due to COVID-19 pandemic.</p> <p>Enforcement of Model Code of Conduct from 17th Nov 2020 to 4th Dec 2020 in view of GHMC elections.</p> <p>Certain unavoidable circumstances viz; uncertainty in commissioning of the LI pumps and delay in receipt of information of power availability and cost there on from Central Generating Stations, which have significant impact on the demand projections and overall ARR respectively.</p> <p>However, ARR for 2019-20, 2020-21, 2021-22 was submitted before TSERC on March 31, 2021, which was not admitted by the Hon'ble Commission due to non-submission of tariff proposals by the TS Discoms.</p>
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	<p>Interlocutory Applications Filed by TS DISCOMS for Extension:</p> <table border="1" data-bbox="193 267 1052 574"> <thead> <tr> <th>FY</th> <th>O. P. Nos.</th> <th>I.A.s filed by TS Discoms</th> <th>Commission Approval Order</th> </tr> </thead> <tbody> <tr> <td>2019-20</td> <td>21 &amp; 22 of 2017</td> <td>I.A. No. 8 of 2020</td> <td>Dated 20.03.2020</td> </tr> <tr> <td>2020-21</td> <td>21 &amp; 22 of 2017</td> <td>I.A. No. 8 of 2020</td> <td>Dated 20.03.2021</td> </tr> <tr> <td>2021-22</td> <td>21 &amp; 22 of 2017</td> <td>I.A. No. 4 of 2021</td> <td>Dated 27.03.2021</td> </tr> </tbody> </table> <p>ix. The relevant orders have been attached herewith as Annexure-A.</p> <p>x. The Objector prays that the Hon'ble Commission may reprimand and penalise the Petitioners for failing at filing its Tariff Petitions on time for the past 4 years.</p>	FY	O. P. Nos.	I.A.s filed by TS Discoms	Commission Approval Order	2019-20	21 & 22 of 2017	I.A. No. 8 of 2020	Dated 20.03.2020	2020-21	21 & 22 of 2017	I.A. No. 8 of 2020	Dated 20.03.2021	2021-22	21 & 22 of 2017	I.A. No. 4 of 2021	Dated 27.03.2021	<p>TS Discoms have been seeking timely extension on tariff filing, from the Hon'ble Commission on the grounds mentioned above.</p> <p>Hence, TS Discoms request the Hon'ble Commission to allow this delay as an on-time exception, and not impose any penalty for the same.</p>
FY	O. P. Nos.	I.A.s filed by TS Discoms	Commission Approval Order															
2019-20	21 & 22 of 2017	I.A. No. 8 of 2020	Dated 20.03.2020															
2020-21	21 & 22 of 2017	I.A. No. 8 of 2020	Dated 20.03.2021															
2021-22	21 & 22 of 2017	I.A. No. 4 of 2021	Dated 27.03.2021															
3	<p>LACK OF TRUE-UP FILINGS</p> <p>xi. As per the applicable Regulation 1 of 2014 dt. 07.03. 2014, the true up variation over the past years should be adjusted in the final ARR of the ensuing year in order to reduce the burden on consumer.</p> <p>xii. The Relevant Extract has been reproduced below:</p> <p><b>12.5 True-up for Retail Supply Business</b></p> <p>a. The Distribution Licensee shall include the power purchase cost variation over the previous year Power Purchase cost in the Tariff Order as expense (in the event of incurring excess cost)/rebate (in case of cost saving) in the ARR as special item with relevant details. To arrive the power purchase cost variation, the least of the following power purchase quantities is to be considered:</p>	<p>TS Discoms have already submitted the Distribution true up claims for 1st, 2nd and 3rd control period along with the APR filing for FY2019-20. TS Discoms have also filed the APR for 2020-21 on 31 December 2021.</p> <p>TS Discoms have already finalized the power purchase true up claim for RSB for 2016-17 to 2018-19 and currently drafting the same for 2019-20, 2020-21 &amp; 2021-22 (prov.). TS Discoms would be submitting all their RSB true up claims shortly to the Hon'ble Commission.</p>																

	<p>i) Actual power purchase quantity procured by the Discoms for its consumers.</p> <p>ii) Power purchase quantity computed based on actual sales except LT Agriculture sales. LT Agricultural sales will be limited to Tariff Order quantity. These aggregated sales will be grossed up with approved losses for the relevant year in the MYT orders.</p> <p>b. Since the complete information of cost actually incurred relating to previous year will not be available at the time of filing of ARR for a particular tariff year, the Licensee may include provisional cost variation for the previous year in ARR filings which will be subject to final correction by the Commission as and when final accounts for that year become available.</p> <p>c. The Licensees shall also include in the ARR the amounts to be collected on final basis being the difference between the cost incurred based on audited annual accounts report and costs provisionally approved by the Commission in the Tariff Order for the year immediately preceding the previous year.</p> <p>f. The approved amounts which are to be collected or have already been collected by Licensee from the consumers for the reference year in pursuance of any regulation/ order covering u/s 62(4) of the Electricity Act, 2003 or in pursuance of clause 12(4) of this regulation shall be suitably adjusted.</p> <p>g. The Commission, after examination of the details, will approve the expense/ rebate duly dealing the same in detail in the relevant Tariff Order. No expense shall be added to or rebate shall be deducted from ARR unless the details of such amounts are provided in the tariff order.</p> <p>h. A format in which information on power purchase quantity and its cost to be filed by licensee for true-up enclosed to this Regulation.</p> <p>xiii. It is submitted that the Annual Audited Accounts of TSPDCL and TSNPDCL up to FY 2020-21 have been issued.</p> <p>xiv. Despite this, the Petitioners have failed to file true up for the past years. It is prayed that the Hon'ble Commission may direct the Petitioners file such trueup petitions so that any refund on account of true-up may be realized by the consumers.</p>	
4	<p>ABSENCE OF CONSOLIDATED WORKING EXCEL MODEL</p> <p>The Licensees have not provided the consolidated working excel model along with the tariff Petitions and the additional information submitted, the absence of which, hinders the process of stakeholder commentary as well as prudence check process of the Hon'ble Commission.</p>	<p>As part of the Additional Information requested by the Hon'ble Commission, TS Discoms have submitted the working models for the Power Purchase Cost, Sales and CSS computations, before the Hon'ble Commission.</p>



		<p>As part of the abovementioned submissions, TS Discoms have also submitted the supported documents for Revenue and COS computations. These submissions are in addition to the detailed RSF formats already submitted as part of the ARR and FPT petitions for FY 2022-23.</p>												
5	<p><b>AVERAGE COST OF SUPPLY (2018-19 VS 2022-23)</b></p> <p>xvi. In the instant Petitions, Licensees have projected a significantly higher average cost of service than the approved in last Retail Supply order for the FY 2018-19. Using the same, the Objector has compiled the charts that depicts the pattern for Average Cost of Supply (ACoS) claimed against that approved by Hon'ble Commission in the FY 2018-19 and also the provisional data for FY 2022-23.</p> <div data-bbox="193 691 1003 1101" data-label="Figure"> <p>The bar chart displays the Average Cost of Supply (ACoS) in Rs./kWh for three entities: TSSPDCL, TSNPDCL, and Telangana State. It compares the approved values for FY 2019 (RST Order) with the claimed values for FY 2023. The Y-axis ranges from 0 to 8 Rs./kWh. The X-axis is divided into two categories: 'Approved as per FY19 RST Order' and 'Claimed by Petitioners for FY 23'. The legend indicates TSSPDCL is blue, TSNPDCL is dark grey, and Telangana State is light grey.</p> <table border="1"> <thead> <tr> <th>Entity</th> <th>Approved as per FY19 RST Order (Rs./kWh)</th> <th>Claimed by Petitioners for FY 23 (Rs./kWh)</th> </tr> </thead> <tbody> <tr> <td>TSSPDCL</td> <td>5.91</td> <td>7.14</td> </tr> <tr> <td>TSNPDCL</td> <td>6.31</td> <td>7.01</td> </tr> <tr> <td>Telangana State</td> <td>6.04</td> <td>7.09</td> </tr> </tbody> </table> </div> <p>xvii. It is humbly pointed out from the charts that Licensees have projected an increase of around 17-21 % in the Average Cost of Supply (ACoS) for FY 2022-23 over the approved figure for FY 2018-19 respectively.</p> <p>xviii. Furthermore, the ACoS claimed by the Andhra Pradesh Discoms for FY 2022-23 in their Retail Tariff Petitions is 27 paise lesser than that claimed by Telangana Discoms.</p>	Entity	Approved as per FY19 RST Order (Rs./kWh)	Claimed by Petitioners for FY 23 (Rs./kWh)	TSSPDCL	5.91	7.14	TSNPDCL	6.31	7.01	Telangana State	6.04	7.09	<p>TS Discoms would like to mention that the comparison of ACOS between the approved figures for FY 2018-19 and projected figures for FY 2022-23, may not be appropriate. The variations between the actual and approved ACOS, shall be dealt by the Hon'ble Commission, during the true-up exercise for the relevant year.</p> <p>It is to be clarified that the actual ACOS for the Telangana Discoms combined is INR 7.04/kWh in FY 2018-19. This indicates that the projected ACOS for FY 2022-23 of INR 7.09/kWh, is expected to increase only at a 0.2% CAGR rate, when compared to FY 2018-19.</p>
Entity	Approved as per FY19 RST Order (Rs./kWh)	Claimed by Petitioners for FY 23 (Rs./kWh)												
TSSPDCL	5.91	7.14												
TSNPDCL	6.31	7.01												
Telangana State	6.04	7.09												

6

**AGGREGATE REVENUE REQUIREMENT (ARR) CLAIMED BY TELANGANA DISCOMS FOR FY 2022-23**

The TSSPDCL and TSNPDCL has projected an Annual Revenue Requirement of Rs. 34,870.18 Crores and Rs. 18,183.37 Crores respectively for FY 202223. The ARR along with its treatment proposed by the TSSPDCL and TSNPDCL is provided in the table below:

**ARR CLAIMED BY PETITIONERS FOR FY 2022-23**

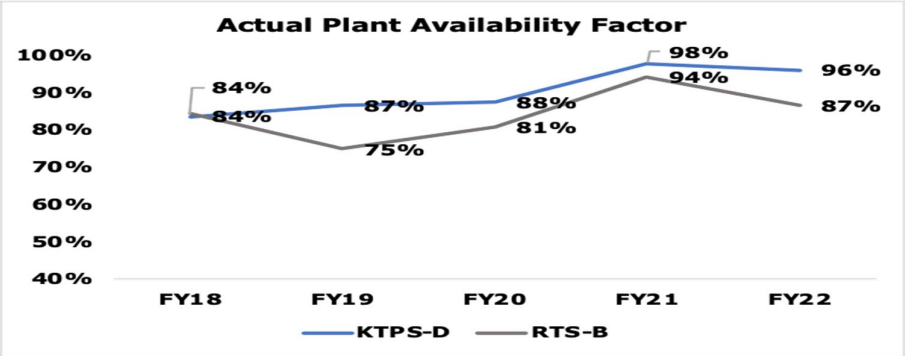
(All figures in Rs. Crores)

Particulars	TSSPDCL	TSNPDCL	TOTAL
Transmission Cost	2,383.64	1,005.43	3,389.07
SLDC Cost	31.67	13.23	44.90
Distribution Cost	4,670.72	3,601.25	8,271.97
PGCIL & ULDC Expenses	1,160.55	484.45	1,645.00
Network and SLDC Cost (A)	8,246.58	5,104.36	13,350.94
Power Purchase / Procurement Cost	26,411.20	13,003.88	39,415.08
Interest on Consumer Security Deposits	174.75	49.09	223.84
Supply Margin in Retail Supply Business	37.65	26.04	63.69
Other Costs if any	-	-	-
Supply Cost (B)	26,623.60	13,079.01	39,702.61
Aggregate Revenue Requirement (A+B)	34,870.18	18,183.37	53,053.55
Non-Tariff Income	33.10	29.41	62.51
Net Revenue Requirement	34,837.08	18,153.96	52,991.04
Total Revenue			
Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)	25,708.48	10,702.76	36,411.24
Revenue Deficit(-)/Surplus(+) at Current Tariffs	-9,128.60	-7,451.20	-16,579.80

No Comments

Government Subsidy u/s 65 of the Electricity Act, 2003	1,397.50	4,254.15	5,651.65
Net gap – Deficit(-)/Surplus(+)	-7,731.10	-3,197.05	-10,928.15

xx. The Objections in respect of the ARR projected by the Petitioners for FY 2022-23 are summarised below:

7	<p><b>POWER PURCHASE COST</b></p> <p>A. TSGENCO Thermal Power Stations:</p> <p>xxi. From Annexure – XX of TSSPDCL’s Reply to Additional Information on Aggregate Revenue Requirement &amp; Tariff Proposals for FY 2022-23, it can be observed that the actual Plant Availability Factor (PAF) of TSGENCO Stations have mostly been above 80% in the last five years. However, the generation in FY 2022-23 has been projected at or less than 80% in respect of KTPS D and RTS B Stations (Average PAF was 90.40% for KTPS D and 84.17% for RTS B in previous five years):</p>  <table border="1"> <caption>Actual Plant Availability Factor</caption> <thead> <tr> <th>FY</th> <th>KTPS-D (%)</th> <th>RTS-B (%)</th> </tr> </thead> <tbody> <tr> <td>FY18</td> <td>84%</td> <td>84%</td> </tr> <tr> <td>FY19</td> <td>87%</td> <td>75%</td> </tr> <tr> <td>FY20</td> <td>88%</td> <td>81%</td> </tr> <tr> <td>FY21</td> <td>98%</td> <td>94%</td> </tr> <tr> <td>FY22</td> <td>96%</td> <td>87%</td> </tr> </tbody> </table>	FY	KTPS-D (%)	RTS-B (%)	FY18	84%	84%	FY19	87%	75%	FY20	88%	81%	FY21	98%	94%	FY22	96%	87%	<p>Availability (MU) projections for all TSGENCO Thermal plants are shown at their Normative PLF’s as per their respective PPA’s considering plant overhaul planning. Projections of TSGENCO plants at 85% PLF as per CERC Tariff Regulation 2019 is not correct as TSDISCOMs would schedule power and make payments as per respective PPA Terms &amp; conditions and TSERC Regulation 1 of 2019.</p> <p>As per TSERC Regulation 1 of 2019, Normative PLF for KTPS –V &amp; RTS B Stations is 80% and 75 % respectively.</p> <p>The Fixed Charges for TSGENCO stations are determined by Hon’ble TSERC in consideration of the Depreciation on Capital cost, Interest on loan, Return on equity, O&amp;M expenses which changes year on year. TSGENCO has filed Multi Year Tariff (MYT) for 2019-2024 for determination of Generation Tariff for which Order is yet to be issued by Hon’ble TSERC. Hence Fixed charges projections made by TSDISCOMs are provisional. However, TSDISCOMs will pay Fixed charges as per Order of TSERC only.</p> <p>TSDISCOMs will admit the Fixed Charges as per the approval of TSERC only.</p>
FY	KTPS-D (%)	RTS-B (%)																		
FY18	84%	84%																		
FY19	87%	75%																		
FY20	88%	81%																		
FY21	98%	94%																		
FY22	96%	87%																		

<p>xxii. In light of the same, the projected PAF in FY 2022-23 ought to be considered at 85% instead of 80% for the TSGENCO plants, which is the norm set by the CERC Tariff Regulations, 2019.</p> <p>xxiii. TSSPDCL in the Sheet titled PP Assumptions in Annexure XI to its Reply to Additional Information on Aggregate Revenue Requirement &amp; Tariff Proposals for FY 2022-23, has submitted that it has considered Fixed Cost as per AprAug (as per actuals), Sept-Mar (as per TSGENCO projections) for KTPS D, KTPS Stage VI, RTS B, Kakatiya TPP Stage II Stations and KTPS VII.</p> <p>xxiv. It is submitted that the Fixed Charges ought to be limited, considering the Fixed Charges as approved by the Hon'ble Commission in its latest TSGENCO Tariff Order instead of the escalations/projections made by the Petitioner. The latest TSGENCO Tariff Order was issued on 05.06.2017 and the Fixed Charges approved for FY 2018-19 ought to be considered in the absence of any GENCO Order approved for FY 2022-23. This approach is upheld by the CERC Generation Tariff Regulations, 2019. The relevant extract is reproduced below:</p> <p>"10. Determination of tariff</p> <p>(4) In case of the existing projects, the generating company or the transmission licensee, as the case may be, shall continue to bill the beneficiaries or the long term customers at the capacity charges or the transmission charges respectively as approved by the Commission and applicable as on 31.3.2019 for the period starting from 1.4.2019 till approval of final capacity charges or transmission charges by the Commission in accordance with these regulations:</p> <p>Provided that the billing for energy charges w.e.f. 1.4.2019 shall be as per the operational norms specified in these regulations."</p>	<p>All the Power Purchase Agreements are being entered with Generators/Developers by TSDISCOMs after taking Hon'ble TSERC approval issued after Public hearings.</p> <p>The landed cost of fuel in respect of TSGENCO stations is being arrived on the following:</p> <p>(a) Coal is being procured from M/s SCCL, a Govt. entity, and its cost is being paid as per the price notifications of M/s SCCL.</p> <p>(b) Oil is being procured from central public sector undertakings viz. HPCL, IOCL &amp; BPCL and the oil rates being paid prevailing on the date of supply.</p> <p>(c) The transportation charges of the fuel by rail are as per the rate circular issued by Ministry of Railways.</p> <p>From, October 2021 onwards, the Coal prices in India have increased, the same has been considered in ARR Filings.</p> <p>In respect of BTPS, the period of construction of plant, FGD cost, Capacity of the unit, GST and Covid impact etc led to increase in the cost of the plant.</p> <p>Other costs are inclusive of Cost of water, IT initiatives, Hydel secondary charges, Thermal incentives and Medical &amp; Welfare Expenses etc.</p>
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xxv. It can be observed from the following table that the Petitioners have deviated from this approach:

Station	Fixed Cost approved in TSGENCO Tariff Order dt. 05.06.2017 (page no. 53)	Fixed Cost as per claimed by Petitioner
	INR Crore	INR Crore
TSGENCO Thermal		
KTPS D	286.27	392.05
KTPS Stage VI	514.04	518.11
RTS B	54.49	122.09
Kakatiya Thermal Power Plant Stage II	757.70	847.17
KTPS VII	622.22*	1,178.66

\*Note: The Hon'ble TSERC had approved AFC for KTPS VII as Rs. 311.11 Crores for FY 2018-19 at page 75 of the TS Discoms Retail Supply Order dated 27.03.2018 for FY 2018-19. It is submitted that the Hon'ble Commission had approved this number considering 6 months' availability for KTPS VII. Since the instant filings consider an availability of one year, the Objector has taken AFC for KTPS VII as twice of Rs. 311.11 Crores, which is Rs. 622.22 Crores.

xxvi. Further, in the case of BTPS Unit 1-4 (7361.10 MU), it can be observed that the Petitioners have claimed an arbitrary increase of more than 10% in the variable charges as per actuals of FY 2020-21 and Fixed Charges considered for the months of operation after CoD. In this regard, it is pointed out that the Petitioners have not provided any data as to why such hike has been claimed in variable charges. Furthermore, last coal price hike for domestic coal, by Coal India Ltd. was in 2018. In view of the same, the escalation considered by them is not tenable and ought to be disallowed.

xxvii. The Petitioner has claimed Rs. 40 Crores towards Other Costs without any justification or supporting documentation. The same ought to be disallowed.

TS Discoms request the objector to refer only to the active sheets in the Annexure XI file. The sheet titled "PP assumptions" in the aforementioned file, is a hidden inactive sheet and doesn't carry any significance to the present context.

TS Discoms have elaborated in detail, the basis of projections for power purchase quantum and cost, in the RSB ARR write-ups submitted to the Hon'ble Commission for FY 2022-23. The objector is requested to refer to the same for the assumptions considered for power purchase related projections.

TS Discoms have gone through the computations done by the objector in the Annexure B.

TS Discoms are unclear on why the objector has considered the same energy dispatch, as projected by the TS Discoms, even after considering the revised energy availability.

TS Discoms have already responded to the rationale behind considering the energy availability and FC, VC projections for FY 2022-23, in the above sections.

TS Discoms would request the Hon'ble Commission to consider the projections shared by Discoms,

	<p>xxviii. In accordance to the above objections, the Objector has proposed a cumulative disallowance of Rs. 1156.64 Crores pertaining to power procured from TSGENCO Thermal Stations.</p> <p>xxix. The detailed computations have been attached herewith as Annexure-B.</p>	<p>considering the justifications shared on the same.</p>
<p>B)</p>	<p>B. TSGENCO Hydel Power Stations:</p> <p>xxx. From the Sheet titled PPC act in Annexure XI to its Reply to Additional Information on Aggregate Revenue Requirement &amp; Tariff Proposals for FY 2022-23, TSSPDCL has recorded that the Estimated Energy Availability and Energy Despatch from Hydel Power Stations is 4921 MUs for FY 2021-22, while for FY 2022-23, the same has been projected as 4000 MUs. There is no rationale provided by the Petitioner for estimating a fall in the energy despatch by 921 MUs for FY 2022-23.</p> <p>xxxi. Further, it is observed that despite projecting a fall in the energy despatch of the Hydel Stations, the Petitioners have proposed an increase in Fixed Charges by Rs. 170.83 Crores. There is no Tariff Order that mandates such increase in Fixed Cost as projected by the Petitioner.</p> <p>xxxii. The availability from hydro stations has been estimated at 4921 MUs in the Objector's assessment scenario. Such increase of 921 MUs would offset expensive power procurement (explained later).</p> <p>xxxiii. In accordance to the above objections, the Objector has proposed a cumulative disallowance of Rs. 170.83 Crores pertaining to power procured from TSGENCO Hydel Stations.</p> <p>xxxiv. The detailed computations have been attached herewith as Annexure-C.</p>	<p><u>Reply to xxx &amp; xxxii</u></p> <p>TS Discoms have considered the energy availabilities for FY 2022-23, as per the projections shared by the respective generating stations.</p> <p>TS Discoms would like to state that the hydro availability of 4,921 MU in FY 2021-22, is predominantly due to a record high hydro generation of 3,074 MU in H1 FY 2021-22, which can be attributed to a good monsoon season in H1 FY 2021-22.</p> <p>It is to be noted that the Hydro generation was 3,424 MU only in the FY 2020-21 and such seasonal conditions in FY 2021-22 can't be considered as a norm and used for the estimates for FY 2022-23. Hence, a moderated reduction over FY 2021-22, has been considered for Hydro availability in FY 2022-23.</p> <p><u>Reply to xxxi</u></p> <p>Fixed charges are payable to Hydel Stations irrespective of Energy.</p> <p>However, TSDISCOMs will pay Fixed Charges to TSGENCO as per TSERC Order only.</p> <p><u>Reply to xxxiii &amp; xxxiv</u></p> <p>TS Discoms have gone through the computations done by the objector in the Annexure C.</p> <p>TS Discoms have already responded to the rationale behind considering the energy availability and FC projections for FY 2022-23, in the above sections.</p>

		TS Discoms would request the Hon'ble Commission to consider the projections shared by Discoms, considering the justifications shared on the same.						
C)	<p>Central Generation Stations:</p> <p>xxxv. TSSPDCL, in the Sheet titled PP Assumptions in Annexure XI to its Reply to Additional Information on Aggregate Revenue Requirement &amp; Tariff Proposals for FY 2022-23, has submitted that it has considered Fixed Cost as follows:</p> <p>NTPC (SR) - I &amp; II, NTPC (SR) Stage III, Talcher Stage 2 and NPTC Simhadri Stage I: Apr-Aug (as per actuals), Sept-Mar - FY 19 FC (as per CERC Tariff Order) escalated by growth rate (FY 19 vs FY 18)</p> <p>xxxvi. It is submitted that the Fixed Charges ought to be limited, considering the Fixed Charges as approved by the Hon'ble CERC in its latest Tariff Orders instead of the escalations made by the Petitioner. It is to be noted that the Fixed Charges approved for FY 2018-19 ought to be considered in the absence of any CERC Order approved for FY 2022-23. This approach is upheld by the CERC Generation Tariff Regulations, 2019. The relevant extract is reproduced below:</p> <p>"10. Determination of tariff</p> <p>(4) In case of the existing projects, the generating company or the transmission licensee, as the case may be, shall continue to bill the beneficiaries or the long term customers at the capacity charges or the transmission charges respectively as approved by the Commission and applicable as on 31.3.2019 for the period starting from 1.4.2019 till approval of final capacity charges or transmission charges by the Commission in accordance with these regulations:</p> <p>Provided that the billing for energy charges w.e.f. 1.4.2019 shall be as per the operational norms specified in these regulations."</p> <p>xxxvii. It can be observed from the following tables that the Petitioners have deviated from this approach:</p> <table border="1" data-bbox="163 1377 1232 1437"> <thead> <tr> <th data-bbox="163 1377 455 1437">Station</th> <th data-bbox="455 1377 728 1437">Fixed Cost approved in Tariff Order</th> <th data-bbox="728 1377 1232 1437">Source</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Station	Fixed Cost approved in Tariff Order	Source				<p><u>Reply to xxxv, xxxvi &amp; xxxvii</u></p> <p>TS Discoms request the objector to refer only to the active sheets in the Annexure XI file. The sheet titled "PP assumptions" in the aforementioned file, is a hidden inactive sheet and doesn't carry any significance to the present context.</p> <p>TS Discoms have elaborated in detail, the basis of projections for power purchase quantum and cost, in the RSB ARR write-ups submitted to the Hon'ble Commission for FY 2022-23. The objector is requested to refer to the same for the assumptions considered for power purchase related projections.</p> <p>As mentioned in the RSB write-up, in the absence of CERC Tariff Orders for the CGS stations for H2 FY 2021-22 and FY 2022-23, the licensee has considered the actual fixed costs paid in H1 FY 2021-22 to arrive at the fixed costs for H2 FY 2021-22. The projections for FY 2022-23, have been considered in line with the arrived projections for FY 2021-22.</p> <p>TS Discoms would request the Hon'ble Commission to consider the projections shared by Discoms, considering the justifications shared on the same.</p>
Station	Fixed Cost approved in Tariff Order	Source						

	(INR Crore)	
NTPC (SR) - I & II	1,061.23	Page No. 36 of CERC Order dated 24.01.2017 in Petition No. 92/GT/2014
NTPC (SR) Stage III	290.82	Page No. 41 of CERC Order dated 17.11.2021 in Petition No. PetitionNo: 444/GT/2020
Talcher Stage 2	1,007.23	Page No. 44 of CERC Order dated 16.02.2017 in Petition No. 93/GT/2014
NTPC Simhadri Stage I	661.99	Page No. 25 of CERC Order dated 27.06.2016 in Petition No.270/GT/2014

\*The relevant Orders have been attached herewith as Annexure-D.

Station	Fixed Cost approved in Tariff Order	Telangana Share	Net Availability as projected by Petitioner	Normative Plant Availability Factor as per CERC	Fixed Cost as per Petitioner	Fixed Cost as per Objector's Assessment
	INR Crore	%	%	%	INR Crore	INR Crore
	A	B	C	D	E	F: if C>=D, F=A*B if C<D, F=A*B*(C/D)
NTPC (SR) – I & II	1,061.23	16.45%	95.38%	85.00%	188.60	174.57
NTPC (SR) Stage III	290.82	17.34%	101.32%	85.00%	57.15	50.43
Talcher Stage 2	1,007.23	10.72%	93.08%	85.00%	117.79	107.98
NTPC Simhadri Stage I	661.99	53.89%	93.73%	85.00%	478.57	356.75

xxxviii. Further, the Petitioners have considered Power Purchase of 3,499.63 MUs for Rs. 1,585.33 Crores (Rs. 4.53/kWh) from Telangana STPP (Phase I). The Petitioner has not submitted any details with respect to the project construction progress pertaining to the

Reply to xxxviii

As per AP Re-organisation Act 2014, NTPC shall establish a 4000 MW (5 X 800 MW) power facility in the successor State of Telangana after establishing necessary coal linkages.



<p>Telangana STPP (Phase I) to back up its claims towards such high-power purchase quantum and rate. It is not clear whether the Hon'ble Central Commission has approved the fixed charge claimed by the Petitioner or not.</p> <p>xxxix. The Objector has not considered any power purchase from Telangana STPP (Phase I) and has instead offset such power purchase quantum from TSGENCO Hydel (921 MUs) and Additional Short Term Power Purchase of 2,578.56 MUs at average DAM market price (FY 2020-21) of Rs. 2.82/kWh. The detailed computations have been attached herewith as Annexure-E.</p> <p>xl. In accordance to the above objections, the Objector has proposed a cumulative disallowance of Rs. 1,760.29 Crores pertaining to power procured from Central Generating Thermal Stations. The detailed computations have been attached herewith as Annexure-F.</p>	<p>Accordingly, TSDISCOMs entered PPA for 2X800 MW (Phase-1)</p> <p>3499.63 MU has been arrived considering CODs of unit -1&amp;2 as 30th September 2022 &amp; 31st December 2022 respectively.</p> <p>NTPC has not yet filed Petition at CERC for determination of tariff.</p> <p><u>Reply to xxxix, xl</u></p> <p>TS Discoms have gone through the computations done by the objector in the Annexure E.</p> <p>TS Discoms have already responded to the rationale behind considering the energy availability and FC, VC projections for FY 2022-23, for Telangana STPP (phase I) and TSGENCO Hydel, in the above sections.</p> <p>Regarding the rate of short-term power purchase, TS Discoms state that the objector has considered the average DAM market price for FY 2020-21 of INR 2.82/kWh, while, the power procured by Discoms is done through other routes too viz., TAM, RTM etc.</p> <p>Also, the short-term procurement is very dynamic in nature, where the rates for that particular instant may go higher than the average rate, in real time scenario. Hence, TS Discoms have considered the ST purchase rate for H2 FY 22 and FY 23, in line with the actual ST purchase rate for FY 21, which will factor in all the above mentioned factors.</p> <p>TS Discoms would further state that the average DAM market price of INR 2.82/kWh for FY 2020-21, is an exceptional case, owing to the demand supply</p>
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		<p>scenario in COVID-19. The average IEX DAM price for FY 2021-22 (till date) is INR 4.00/kWh. Considering this, TS Discoms have taken a conservative approach by projecting ST purchase at INR 3.85/kWh.</p> <p>TS Discoms would request the Hon'ble Commission to consider the projections shared by Discoms, considering the justifications shared on the same.</p>
D)	<p>Other Stations:</p> <p>xli. In the case of Singareni CCL I TPS, the Petitioners have projected an increase in Variable Charge Rate by 14% for FY 2022-23 over the actuals of FY 2020-21. It is pointed out that the Petitioners have not submitted any data to justify such arbitrary escalation. In view of the same, the escalation considered by them is not tenable and ought to be disallowed.</p> <p>xlii. The Petitioners have also claimed Rs. 2.20 Crores and Rs. 62.37 Crores towards Other Costs for Power Purchase from Singareni CCL I TPS and Thermal Power Tech TPS respectively, without any justification or supporting documentation. The same ought to be disallowed.</p>	<p>STPP is getting coal under Bridge linkage MoU with SCCL, whereas other projects are having linkage coal.</p> <p>From, October 2021 onwards, the Coal prices in India have increased, thus, the same has been projected by STPP for the FY 2022-23.</p> <p>STPP claimed Water charges of Rs. 2.20 Crs based on past actual values as per the regulation.</p> <p>Rs.62.37 Crs towards other costs for the power purchases from M/s Sembcorp Energy India Ltd (Formerly Thermal powertech) is considered based on the Supplementary Charges approved by Hon'ble CERC under Change-in-Law under "Any changes (or) introduction of Taxes/Levies (duties/charges)".</p>
E)	<p>Short Term Power Purchase and D-D Sales:</p> <p>xliii. The Petitioner has considered procurement of 2393 MU at an average rate of Rs. 3.85/kWh to meet seasonal shortages. Most of the shortages projected by the Discoms are in the months of August, December, January, February and March, which are the lean demand seasons where prices at power exchanges are typically lower.</p>	<p><u>Reply to xliii &amp; xliv</u></p> <p>Procurement of power under short term (Power Exchanges) considering power shortages in certain Time-Blocks is inevitable to bridge the Day to Day Demand-Supply gap. Actual payment for this power purchase is based on the actual price discovered in the Exchange for respective Time Blocks.</p>

	<p>xliv. The projected surplus months of Telangana are typically the shortage months for NR (Northern) States and the projected shortage months of Telangana are typically the surplus months of NR States. Discoms should enter into banking contracts with NR States to avoid burden on the consumers.</p> <p>xlv. Notwithstanding the above, the average rate of Rs. 3.85/kWh considered by the Discoms is significantly on the upper side. As has been mentioned earlier, the actual average rate of power in power exchange for DAM Market in FY 2020-21 was Rs. 2.82/kWh. The Objector has used the actual monthly DAM MCP for FY 2020-21 and actual monthly RTM MCP for FY 2020-21 (whichever was lower) for arriving at the Short Term Power Purchase Cost allowable. The effect of the same is reflected in the D-D purchase cost as well. The detailed computations have been attached herewith as Annexure-E as has been mentioned earlier. This has resulted in a cumulative disallowance of Rs. 312.95 Crores.</p>	<p>Efforts are also being made by TSDISCOMs for Banking arrangements with other State Utilities.</p> <p><u>Reply to xlv</u> Regarding the rationale behind choosing the rate of short-term power purchase for FY 2022-23, TS Discoms have already responded in the abovementioned section. TS Discoms would request the Hon'ble Commission to consider the projections shared by Discoms, considering the justifications shared on the same.</p>																																																																														
F)	<p>Surplus Power:</p> <p>xlvi. The Petitioners have estimated 5459 MUs as surplus power which is estimated to be sold at an average price of Rs. 2.90/kWh. Revenue from such surplus power (Rs. 1581 Crores) has not been subtracted from the Power Purchase Cost.</p>	<p>TS Discoms haven't considered the sale of surplus power, as the revenue from sale of such surplus power will be lower than the cost of the power procured from the marginal station, during that particular month i.e. procuring such excess power for the purpose of sale, shall be costlier and further burden the end consumer.</p>																																																																														
	<p>xlvii. The Summary of Disallowances in Power Purchase Cost as per the Objector's Assessment is summarized below:</p> <table border="1" data-bbox="163 1003 1199 1414"> <thead> <tr> <th colspan="10">Power Purchase Cost as per Petitioner's Submission</th> </tr> <tr> <th rowspan="3">Particulars</th> <th colspan="3">State</th> <th colspan="3">TSSPDCL</th> <th colspan="3">TSNPDCL</th> </tr> <tr> <th colspan="3">2022-23 (projections)</th> <th colspan="3">2022-23 (projections)</th> <th colspan="3">2022-23 (projections)</th> </tr> <tr> <th>PP MU</th> <th>PP Cost (INR Cr.)</th> <th>PP Cost (INR/kWh)</th> <th>PP MU</th> <th>PP Cost (INR Cr.)</th> <th>PP Cost (INR/kWh)</th> <th>PP MU</th> <th>PP Cost (INR Cr.)</th> <th>PP Cost (INR/kWh)</th> </tr> </thead> <tbody> <tr> <td>TSGENCO Thermal</td> <td>27,206.10</td> <td>13,288.99</td> <td>4.88</td> <td>19,193.90</td> <td>9,375.38</td> <td>4.88</td> <td>8,012.20</td> <td>3,913.61</td> <td>4.88</td> </tr> <tr> <td>TSGENCO Hydel</td> <td>4,000.00</td> <td>1,351.98</td> <td>3.38</td> <td>2,822.00</td> <td>953.82</td> <td>3.38</td> <td>1,178.00</td> <td>398.16</td> <td>3.38</td> </tr> <tr> <td>CGS stations</td> <td>19,499.53</td> <td>8,113.45</td> <td>4.16</td> <td>13,756.92</td> <td>5,724.04</td> <td>4.16</td> <td>5,742.61</td> <td>2,389.41</td> <td>4.16</td> </tr> <tr> <td>APGPCL</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> </tr> </tbody> </table>	Power Purchase Cost as per Petitioner's Submission										Particulars	State			TSSPDCL			TSNPDCL			2022-23 (projections)			2022-23 (projections)			2022-23 (projections)			PP MU	PP Cost (INR Cr.)	PP Cost (INR/kWh)	PP MU	PP Cost (INR Cr.)	PP Cost (INR/kWh)	PP MU	PP Cost (INR Cr.)	PP Cost (INR/kWh)	TSGENCO Thermal	27,206.10	13,288.99	4.88	19,193.90	9,375.38	4.88	8,012.20	3,913.61	4.88	TSGENCO Hydel	4,000.00	1,351.98	3.38	2,822.00	953.82	3.38	1,178.00	398.16	3.38	CGS stations	19,499.53	8,113.45	4.16	13,756.92	5,724.04	4.16	5,742.61	2,389.41	4.16	APGPCL	-	-	-	-	-	-	-	-	-	<p>TS Discoms have gone through the detailed computations done by the objector in the Annexures A to F.</p> <p>While, TS Discoms appreciate the intention and efforts put in by the objector, behind the analysis undertaken for the Power purchase cost projections for FY 2022-23, TS Discoms feel that those assumptions are very optimistic and intended only towards the reduction of the costs, without considering the practicality of the same.</p> <p>TS Discoms have already responded to the rationale behind considering the energy availability and FC, VC projections for FY 2022-23, for the respective</p>
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NCES	8,953.18	4,485.57	5.01	6,271.16	3,161.69	5.04	2,682.02	1,323.87	4.94
IPPs (Thermal Power Tech)	6,985.90	3,146.20	4.50	4,928.55	2,219.65	4.50	2,057.35	926.56	4.50
Singareni	7,466.00	3,650.10	4.89	5,267.26	2,575.14	4.89	2,198.74	1,074.95	4.89
CSPGCL	6,349.58	2,476.33	3.90	4,479.63	1,747.05	3.90	1,869.95	729.28	3.90
Inter-Discom purchase			-	-4,074.07	-1,393.26	3.42	4,074.07	1,393.26	3.42
Short-term power purchase	2,392.65	920.39	3.85	1,688.01	649.33	3.85	704.64	271.05	3.85
Additional Short Term Purchase to offset Telangana STPP-1									
PTC	1,368.84	587.23	4.29	965.72	414.29	4.29	403.12	172.94	4.29
Interest on pension bonds		1,394.83	-		984.05	-		410.78	-
Other Costs		-	-		-	-		-	-
Total	84,221.77	39,415.08	4.68	55,299.08	26,411.20	4.78	28,922.69	13,003.88	4.50

generating station and short-term sources, in the abovementioned sections.  
TS Discoms would request the Hon'ble Commission to consider the projections shared by Discoms, considering the justifications shared on the same.

Power Purchase Cost as per Objector's Assessment

Particulars	State			TSSPDCL			TSNPDC L		
	2022-23			2022-23			2022-23		
	PP MU	PP Cost (INR Cr.)	PP Cost (INR/kWh)	PP MU	PP Cost (INR Cr.)	PP Cost (INR/kWh)	PP MU	PP Cost (INR Cr.)	PP Cost (INR/kWh)
TSGENCO Thermal	27,206.10	12,132.35	4.46	19,193.90	8,559.37	4.46	8,012.20	3,572.98	4.46
TSGENCO Hydel	4,921.07	1,181.16	2.40	3,471.82	833.30	2.40	1,449.26	347.85	2.40
CGS stations	15,999.90	6,353.16	3.97	11,287.93	4,482.16	3.97	4,711.97	1,871.01	3.97

APGPCL	-	-	-	-	-	-	-	-	-	-
NCES	8,953.18	4,485.57	5.01	6,271.16	3,161.69	5.04	2,682.02	1,323.87	4.94	
IPPs (Thermal Power Tech)	6,985.90	3,083.84	4.41	4,928.55	2,175.65	4.41	2,057.35	908.19	4.41	
Singareni	7,466.00	3,373.04	4.52	5,267.26	2,379.68	4.52	2,198.74	993.36	4.52	
CSPGCL	6,349.58	2,476.33	3.90	4,479.63	1,747.05	3.90	1,869.95	729.28	3.90	
Inter-Discom purchase			-	-4,074.07	-1,202.63	2.95	4,074.07	1,202.63	2.95	
Short-term power purchase	2,392.65	607.43	2.54	1,688.01	428.54	2.54	704.64	178.89	2.54	
Additional Short Term Purchase to offset Telangana STPP-1	2,578.56	727.26	2.82	1,819.17	513.08	2.82	759.38	214.18	2.82	
PTC	1,368.84	587.23	4.29	965.72	414.29	4.29	403.12	172.94	4.29	
Interest on pension bonds		1,394.83	-		984.05	-		410.78	-	
Other Costs		-	-		-	-		-	-	
Total	84,221.77	36,402.20	4.32	55,299.08	24,476.25	4.43	28,922.69	11,925.95	4.12	

Particulars	Disallowances in Power Purchase Cost claimed by the Petitioners as per Objector's Assessment (INR Crores)		
	State	TSSPDCL	TSNPDCL
TSGENCO Thermal	1,156.64	816.01	340.63
TSGENCO Hydel	170.83	120.52	50.31
CGS stations	1,760.29	1,241.89	518.41
APGPCL	-	-	-
NCES	-	-	-
IPPs (Thermal Power Tech)	62.37	44.00	18.37
Singareni	277.06	195.47	81.59
CSPGCL	-	-	-

Inter-Discom purchase	-	-190.63	190.63
Short-term power purchase	312.95	220.79	92.16
Additional Short Term Purchase to offset Telangana STPP-1	-727.26	-513.08	-214.18
PTC	-	-	-
Interest on pension bonds	-	-	-
Other Costs	-	-	-
Total	3,012.88	1,934.95	1,077.93

8	<p><b>DISTRIBUTION COST</b></p> <p>xlvi. The following directives were given in the Distribution MYT order dt. 29.04.2020 by Hon'ble Commission:</p> <p>"2. Annual Performance Review The Commission directs the DISCOMs to file the Performance Review (trueup) for each year of 4th Control Period before 31st December of the following year. As a first step, the DISCOMs shall file the Annual Performance Review for FY 2019-20 by 31.12.2020.</p> <p>3. True-up for 1st, 2nd and 3rd Control Periods The Commission directs the DISCOMs to submit their true-up claims along complete details sought regarding the capitalisation claimed for each year of the 1st, 2nd and 3rd Control Periods in the Petitions to be filed for Annual Performance Review for FY 2019-20. The DISCOMs are also directed to submit the requisite supporting documents such as Physical Completion Certificates (PCCs), Financial Completion Certificates (FCCs) etc. as mandated in the investment approval guidelines. The Commission directs the DISCOMs to make a detailed submission regarding the differential treatment of GoTS under the UDAY scheme and likely consequences of the same in in the Petitions to be filed for Annual Performance Review for FY 2019-20 The Commission directs the DISCOMs to submit the details of long-term loans viz., loans availed for capital expenditure, taken over by GoTS under UDAY scheme in the Petitions to be filed for Annual Performance Review for FY 2019-20.</p> <p>4. Computation of depreciation in accordance with CERC (Terms and Conditions of Tariff) Regulations, 2019</p>	<p>Discom filed Annual Performance Review for FY 2019-20 and FY 2020-21 before Honble Commission in accordance to the compliance of Directive No.2.</p> <p>Discom filed True-up for 1st , 2nd and 3rd control periods before Honble Commission along with APR filing for FY 2019-20.</p> <p>DISCOM also submitted Physical Completion Certificates (PCCs), Financial Completion Certificates (FCCs) etc. as mandated in the investment approval guidelines.</p> <p>The DISCOM submitted the information on UDAY scheme along with APR filing for FY 2019-20.</p>
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<p>The Commission directs the DISCOMs to submit the computations of depreciation for each year of 4th Control Period in accordance with the provisions of the CERC Tariff Regulations, 2019 in Annual Performance Review for each year of 4th Control Period.</p> <p>5. Capital Investments</p> <p>The DISCOMs shall seek approval for individual schemes at least 90 days undertaking the investment in accordance with the Guidelines for Investment Approval. The individual schemes/ projects submitted by the DISCOMs for Commission's approval must provide complete details including those relating to the cost and capitalisation for each year of 4th Control Period.</p> <p>Considering the importance of capitalisation of works, the Commission lays down the following requirements to be fulfilled before accepting inclusion of the value of capitalised work in the Original Cost of Fixed Assets (OCFA):</p> <ol style="list-style-type: none"> <li>a. On completion of a capital work, a physical completion certificate (PCC) to the effect that the work has been fully executed, physically, and the assets created are put in use, to be issued by the concerned engineer not below the rank of Superintendent Engineer.</li> <li>b. The PCC shall be accompanied or followed by a financial completion certificate (FCC) to the effect that the assets created have been duly entered in the fixed assets register by transfer from the Capital Works in Progress (CWIP) register to OCFA. The FCC shall have to be issued by the concerned finance officer not below the rank of Senior Accounts Officer.</li> <li>c. The above-mentioned certificates have to be submitted to the Commission within 60 days of completion of work, at the latest.</li> </ol> <p>The Commission may also inspect or arrange to inspect, at random, a few of the capitalised works included in the OCFA to confirm that the assets created are actually being used and are useful for the business."</p> <p>xlix. None of the above directives have been complied with, by the Discoms.</p> <ol style="list-style-type: none"> <li>I. In light of above, the Objector submits that the Hon'ble Commission may reprimand the Discoms and issue a directive of disallowance or withholding of 30% of its Distribution cost on the account of non-adherence to MYT Regulations and non-compliance with Directives.</li> <li>li. In this regard, it is pertinent to mention that in its Order dated 31.05.2013, in Suo - Motu Case No. 01 of 2013 &amp; Petition Nos.: 849/2012 &amp; 883/2013, pertaining to</li> </ol>	<p>TSNPDCL have already adopted the CERC depreciation rates as per CERC (Terms and Conditions of Tariff) Regulations, 2019 from FY 2020-21 onwards.</p> <p>The DISCOM submitted the PCC and FCC for the fourth control period for FY 2019-20, FY 2020-21, 1<sup>st</sup> and 2<sup>nd</sup> quarter of FY 2021-22 to the Honble Commission in accordance to the directives.</p> <p>The directives issued by the Honble Commission are being complied with by the DISCOM and hence the question of disallowance or withholding of distribution cost doesn't arises.</p>
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	<p>'Determination Of Annual Revenue Requirement (ARR) And Tariff for FY 2013-14 Along With True Up for FY 2008-09, 2009-10 And 2010-11 Of Uttar Pradesh Power Transmission Corporation Limited (UPPTCL)', the Hon'ble Uttar Pradesh Electricity Regulatory Commission (Hon'ble UPERC) had withheld 20% of Depreciation for non-compliance of directive by UPPTCL. The relevant extract is reproduced below:</p> <p>"C) The Commission's views:</p> <p>3.2.41 The Commission has already expressed its displeasure on the non maintenance of fixed asset registers. However, the Commission has initiated suo-motu proceedings for tariff determination based on its best judgment of the actual capital investments and capitalisation in the transmission segment based on audited accounts.</p> <p>3.2.42 As a first step towards reprimanding the Licensee over the issue of non-preparation of fixed asset registers, the Commission has withheld 20% of the allowable depreciation for FY 2013-14. The same would be released for recovery through tariff, upon submission of fixed asset registers up to the current year i.e., FY 2012-13."</p> <p>(Emphasis supplied)</p> <p>lii. Also, in its Tariff Order of FY 2019-20 dated 27.08.2019 for UPPTCL, the Hon'ble UPERC had disallowed 50% of RoE on account of UPPTCL deviating from the UPERC MYT Regulations. The relevant extract is reproduced below:</p> <p>"7.11.6 The Return on Equity computed by the Commission for FY 2019-20 comes out to be Rs. 176.26 Crore, however as UPPTCL has not followed the UPERC (Multi Year Transmission Tariff) Regulation 19 A and the Commission showing its displeasure has allowed only 70% of Capital Investment &amp; 70% of O&amp;M expenses and further the Commission allows only 50% of the Return on Equity claimed by the Petitioner i.e. 1% which comes out to be as Rs. 86.13 Crore."</p> <p>(Emphasis supplied)</p> <p>The relevant Orders are attached herewith as Annexure-G.</p>	
9	<p>PGCIL &amp; ULDC CHARGES</p> <p>liii. As per the PGCIL charges computation provided by TSSPDCL &amp; TSNPDCL in their Annexures – IX &amp; XVIII respectively, the applicable capacity considered for the calculation of POC charges is cumulatively 4669 MW for FY 2022-23 for the State of Telangana. It is observed from the SRPC RTA &amp; RTDA account for the billing month of January, 2022 that the current actual allocated capacity is to the tune of 4304.91 MW. The Objector has computed</p>	<p><u>Reply to liii &amp; Iv</u></p> <p>TS Discoms state that the computations submitted for PGCIL charges for FY 2022-23, were based on the allocation capacity, as per the TS share % prevalent at the time of filing of the RSB ARR petition, which was till Oct-2021.</p>



the transmission charges considering the current actual capacity of 4304.91 MW instead of 4669 MW considered by the Discom.

liv. The Petitioners have claimed Rs. 12 Crores under the head of STOA charges as per the Annexures IX & XVIII submitted as part of their Additional Information responses. It is submitted that as per the Hon'ble CERC's "Sharing of InterState Transmission Charges and Losses Regulations, 2020 in STOA Collective and Bilateral Transactions", no transmission charges for Short Term Open Access for inter-State transmission system, shall be payable by a distribution licensee which has Long Term Access or Medium Term Open Access or both, or by a trading licensee acting on behalf of such distribution licensee. Pursuant to the said Regulations, it is prayed that the Hon'ble Commission may disallow claim of Rs. 12 Crores made by the Petitioners.

SRPC Website - Transmission Charges for Telangana			
Month	MW	Transmission Charges (INR)	INR/MW/month
Jan-21	4159	1207502778	290347
Feb-21	4191	1210948173	288950
Mar-21	4239	1324378279	312401
Apr-21	4251	1213158171	285368
May-21	4257	1302220364	305896
Jun-21	4248	1251447377	294583
Jul-21	4250	1229223335	289235
Aug-21	4241	1153781639	272030
Sep-21	4258	1169008077	274523
Oct-21	4264	1082824108	253947
Average (A)			290370

**Objector's Assessment of PGCIL Charges for FY 2022-23**

Particulars	Units	Petitioner as per Annexure IX & XVIII	Objector Assessment as per SRPC RTDA Accounts
		Value	Jan-22

Also, as elaborated in the Annexure IX of its Additional Information submissions, it is to be clarified that the applicable capacity for PGCIL charges, shall also include the PTC capacity, which won't be specified in the SRPC statements.

Reply to liv

TS Discoms would like to clarify that they have been paying STOA charges for H1 FY 2021-22, on account of power procurement from power exchanges.

Hence, TS Discoms have claimed the STOA charges for FY 2022-23, in line with the per-unit STOA charges paid for H1 FY 2021-22.

TS Discoms would request the Hon'ble Commission to consider the projections shared by Discoms, considering the justifications shared on the same.

Capacity applicable for POC charges (TS share) (B)	MW	4669	4305
PGCIL (Non-POC) Charges for H1 FY 22	INR Cr.	0.4	0.4
SRLDC Fees & Charges for H1 FY 22	INR Cr.	3	3
STOA Charges for H1 FY 22	INR Cr.	10	10
Short-term quantum for H1 FY 22 (excl. PTC)	MU	1985	1985
Per-unit STOA charge for H1 FY 22	INR/kWh	0.05	0.05
Expected Short-term purchase quantum for FY 23 (excl. PTC)	MU	2393	2393

PGCIL Charges for FY 2022-23	Petitioner Submission as per Annexure IX & XVIII	Objector's Assessment as per SRPC RTDA Accounts
Particulars	Value	Value
PGCIL (POC) charges for FY 23 (C) (C = A*B*12/10^7)	1,627	1500
PGCIL (Non-POC) Charges for FY 23	1	1
SRLDC Fees & Charges for FY 23	6	6
STOA Charges for FY 23	12	-
Total PGCIL Charges for FY 23	1,645	1,507
TSSPDCL PGCIL Charges for FY 23	1,160.55	1,062.96
TSNPDCL PGCIL Charges for FY 23	484.45	443.72

FY 2022-23	Petitioner Submission (A)	Allowable as per Objector's Assessment (B)	Proposed Disallowance (A-B)
TSSPDCL	1,160.55	1,062.96	97.59
TSNPDCL	484.45	443.72	40.73
Total PGCIL charges	1,645.00	1,506.67	138.33

	<p>The relevant extract of the SRPC RTDA Accounts for January, 2022, are attached herewith as Annexure-H.</p> <p>lv. It is respectfully submitted that the Hon'ble Commission may consider the Objector's proposed disallowance and allow the same after due prudence check.</p>																																										
10	<p style="text-align: center;"><b>NON-TARIFF INCOME</b></p> <p>lvi. The Discoms have claimed NTI towards Retail Supply Business to the tune of Rs. 65.60 Crores and Rs. 62.51 Crores for FY 2020-21 and FY 2022-23, respectively. It is the observation of the Objector that the Discoms have understated Non-Tariff Incomes in comparison to the figures recorded in the Audited Accounts of the Discoms. As per the Audited Accounts of FY 2020-21, the NTI booked for Retail and Distribution Business is Rs. 2089.13 Crores while the NTI for Distribution Business as approved in the Distribution MYT Order dated 01.03.2021, is Rs. 608.79 Crores – which indicates that the balance amount of 1480.34 Crores is attributable to the Retail Supply Business.</p> <p>lvii. Assuming the overall NTI on the basis of the Audited Accounts of FY 2020-21 and the Distribution NTI on the basis of Distribution MYT Order, the Objector has estimated Rs. 1,377.20 Crores as NTI for both Discoms for FY 2022-23 for Retail Supply Business.</p> <p style="text-align: center;"><b>Objector Assessment of Non-Tariff Income for FY 2022-23</b> (All Figures in Rs. Crores)</p> <table border="1" data-bbox="170 873 1211 1240"> <thead> <tr> <th rowspan="2">Non-Tariff Income Particulars</th> <th colspan="2">TSSPDCL</th> <th colspan="2">TSNPDCL</th> <th colspan="2">Total</th> </tr> <tr> <th>Actuals</th> <th>Objector's Assessment</th> <th>Actuals</th> <th>Objector's Assessment</th> <th>Actuals</th> <th>Objector's Assessment</th> </tr> <tr> <th>Particulars</th> <th>2020-21</th> <th>2022-23</th> <th>2020-21</th> <th>2022-23</th> <th>2020-21</th> <th>2022-23</th> </tr> </thead> <tbody> <tr> <td>As per accounts (A)</td> <td>1346.49</td> <td>1346.49</td> <td>742.64</td> <td>742.64</td> <td>2089.13</td> <td>2089.13</td> </tr> <tr> <td>Approved in Distribution Order (B)</td> <td>456.87</td> <td>536.47</td> <td>151.92</td> <td>175.46</td> <td>608.79</td> <td>711.93</td> </tr> <tr> <td>Balance understated allowable for Retail Supply Business (A-B)</td> <td>859.63</td> <td>810.02</td> <td>555.11</td> <td>567.18</td> <td>1414.74</td> <td>1377.20</td> </tr> </tbody> </table> <p>lviii. It is respectfully submitted that the Hon'ble Commission may align the Non Tariff incomes strictly in line with the audited accounts and reduce it from the ARR being approved.</p>	Non-Tariff Income Particulars	TSSPDCL		TSNPDCL		Total		Actuals	Objector's Assessment	Actuals	Objector's Assessment	Actuals	Objector's Assessment	Particulars	2020-21	2022-23	2020-21	2022-23	2020-21	2022-23	As per accounts (A)	1346.49	1346.49	742.64	742.64	2089.13	2089.13	Approved in Distribution Order (B)	456.87	536.47	151.92	175.46	608.79	711.93	Balance understated allowable for Retail Supply Business (A-B)	859.63	810.02	555.11	567.18	1414.74	1377.20	<p>The details of Non-tariff income as per audited accounts and the segregation of accounts between distribution and retail supply business for FY 2020-21 along with other income which is not considered for the reasons mentioned in the "Remarks" column of the table and the basis of projections for FY 2021-22 and FY 2022-23 is clearly mentioned under para no. 6.2 of Chapter - 6 at page no. 61- 62 in the ARR &amp; Tariff Proposals of the DISCOM.</p> <p>Further to mention that other income that is not considered in the Non-tariff income mainly comprises of Delayed Payment surcharge income which is essentially for the additional Credit extended by the Licensee to its customers to meet the interest on working capital borrowings.</p>
Non-Tariff Income Particulars	TSSPDCL		TSNPDCL		Total																																						
	Actuals	Objector's Assessment	Actuals	Objector's Assessment	Actuals	Objector's Assessment																																					
Particulars	2020-21	2022-23	2020-21	2022-23	2020-21	2022-23																																					
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Balance understated allowable for Retail Supply Business (A-B)	859.63	810.02	555.11	567.18	1414.74	1377.20																																					

11 SALES PROJECTIONS

lix. Arbitrary escalation has been considered by the Discoms for projecting the sales for FY 2021-22 (H2) and FY 2022-23. For categories, such as LT I –Domestic, HT 33 kV, the growth is taken equal to or more than 7% while the 1-year, 2-year, 3-year, 4-year and 5-year CAGR is not more than 5%. Even as per the CEA, the Electrical Energy Requirement is projected to increase at a CAGR of 4.42% for the period FY 2021-22 to FY 2026-27 for Telangana under the Optimistic scenario. Hence, we humbly submit that the Hon'ble TSERC may consider the escalation as per the actual 5-year CAGR for the respective categories.

lx. The connected load for LT V – Agricultural consumers is increasing Y-o-Y, as shown in table below; however, the energy sales are decreasing. The Objector submits that the rationale and contentions of the Petitioner towards projection of agricultural sales defies logic and the sales projections ought to be re-worked by this Hon'ble Commission. Correct and prudent estimation of the agricultural consumption is vital as subsidy support from State Government hinges on this aspect.

FY	TSSPDCL		TSNPDCL	
	Connected Load (HP)	Sales (MU)	Connected Load (HP)	Sales (MU)
2018-19	5522130	12637.78	5733821	8200
2019-20	5668800	10818.39	5906250	7138
2020-21	5898650	11744.84	6095822	7903
2021-22	6198700	11647.65	6416837	7837
2022-23	6448700	11181.74	6737852	7524

lxi. It is prayed that the Hon'ble Commission may examine this aspect.

TS Discoms would like to state that sales projections for FY 2021-22 H2 and FY 2022-23 have been made by calculating the CAGR for the respective discoms for over a period from 1 year CAGR to 5 year CAGR. Further an appropriate CAGR is considered for predicting sales for respective years.

Projecting sales only on the basis of last year's sales growth would not give a perfect picture. Thus CAGR methodology is followed which takes care of the historical trend. Also load additions in the coming years have also been considered, this is the reason we are able to see higher sales projections.

Following table shows the CAGR for the past 5 years for FY 2022-23 for LT Dom. category

FY23	1Y CAGR	2Y CAGR	3Y CAGR	4Y CAGR	5Y CAGR
TSSPDCL	5.45%	5.14%	4.47%	2.98%	3.65%
TSNPDCL	6.73%	6.88%	7.44%	5.72%	5.17%

Considering the above rates TSSPDCL have adopted a nominal growth rate of 7% & TSNPDCL have adopted a 3Y CAGR of 7.44% for projecting LT Dom. Sales

Regarding HT 33 kV sales - The total sales for TSSPDCL for FY2022-23 is 7156 MUs out of which 487 MUs are due to additional loads coming up, similarly for TSNPDCL Total 33 kV sales is 649 MUs which is derived after considering Singareni Load reductions. Thus TS Discoms have tried the best approach to predict the sales for FY 2021-22 H2 and 2022-23, additional

upcoming loads have also been considered due to which we are able to see higher sales projections.

TS Discoms would like to state that the assessment of agricultural consumption is done every month, as per the ISI methodology, approved by the Hon'ble Commission and the same are submitted to the Hon'ble TSERC. For this purpose, the sample for each capacity (i.e., kVA rating) is chosen using a random sampling procedure. The consumption of each of these sample DTRs are measured each month. The average consumption per DTR is then estimated from the total consumption of all the sample DTRs in each circle. The average DTR consumption of each capacity of DTR population is the basis for extrapolation of the agricultural consumption.

TS Discoms are expecting that the sales of agriculture category will decrease with upcoming LIS Loads as these two are complementary things, i.e. Increase in LIS consumption would provide easy accessibility for water and help agriculture consumers to pump the water by consuming a lesser amount of energy.

Projecting LIS sales consist of a high amount of unpredictability, availability of water is an important factor. However, LIS sales are projected by considering the current pumping stations loads on Krishna & Godavari river and any upcoming additional loads. These loads are further considered to be operating only at a 60% load factor. Thus, if all conditions work fine LIS loads would generate the projected LIS Sales consumption and would also

		<p>affect the agriculture sales causing it to decrease marginally. Thus, TS Discoms have considered a past reference i.e. CAGR while projecting sales for LT Agriculture.</p>																																								
12	<p>GOVERNMENT OF TELANGANA SUBSIDY</p> <p>lxii. As per the Retail Supply Tariff (RST) Order for FY 2018-19, the Hon'ble Commission has approved the subsidy requirement as shown below:</p> <p>6.9.5 The details of subsidy requirement computed by the Commission is as shown in the Table below:</p> <p style="text-align: center;"><b>Table 6.6: Subsidy for FY 2018-19 (Rs. crore)</b></p> <table border="1" data-bbox="243 699 1213 987"> <thead> <tr> <th>S. No.</th> <th>Consumer category</th> <th>SPDCL</th> <th>NPDCL</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>LT I: Domestic</td> <td>267.03</td> <td>969.62</td> <td><b>1236.64</b></td> </tr> <tr> <td>2</td> <td>LT V: Agriculture</td> <td>1130.48</td> <td>3284.52</td> <td><b>4415.00</b></td> </tr> <tr> <td>3</td> <td><b>Sub-total</b></td> <td><b>1397.50</b></td> <td><b>4254.14</b></td> <td><b>5651.64</b></td> </tr> <tr> <td>4</td> <td>RESCO (4.1+4.2)</td> <td>-</td> <td>288.82</td> <td>288.82</td> </tr> <tr> <td>4.1</td> <td><i>LT I: Domestic</i></td> <td>-</td> <td><i>16.39</i></td> <td><i>16.39</i></td> </tr> <tr> <td>4.2</td> <td><i>LT V: Agriculture</i></td> <td>-</td> <td><i>272.44</i></td> <td><i>272.44</i></td> </tr> <tr> <td><b>3+4</b></td> <td><b>Total</b></td> <td><b>1397.50</b></td> <td><b>4542.96</b></td> <td><b>5940.47</b></td> </tr> </tbody> </table> <p>lxiii. It is pertinent to mention that the Hon'ble Commission in the Retail Supply Tariff (RST) Order for FY 2018-19 had stated that in case of non-commitment by GoTS for the release of the said differential amount by 30.09.2018, the DISCOMs shall file Petition(s) before the Commission seeking appropriate relief. The relevant paragraphs of the Retail supply order for FY 2018-19 towards administration of subsidy are reproduced below:</p> <p>"6.9.3 As against the subsidy requirement of Rs. 5940.47 crore computed by the Commission for FY 2018-19, GoTS has informed that an amount of Rs. 4984.30 crore has been provisioned in the Budget, for reimbursement towards agriculture and allied subsidy for FY 2018-19 and the balance amount will be examined at appropriate time. Taking cognizance of the communication of GoTS, the Commission determines the Retail Supply</p>	S. No.	Consumer category	SPDCL	NPDCL	Total	1	LT I: Domestic	267.03	969.62	<b>1236.64</b>	2	LT V: Agriculture	1130.48	3284.52	<b>4415.00</b>	3	<b>Sub-total</b>	<b>1397.50</b>	<b>4254.14</b>	<b>5651.64</b>	4	RESCO (4.1+4.2)	-	288.82	288.82	4.1	<i>LT I: Domestic</i>	-	<i>16.39</i>	<i>16.39</i>	4.2	<i>LT V: Agriculture</i>	-	<i>272.44</i>	<i>272.44</i>	<b>3+4</b>	<b>Total</b>	<b>1397.50</b>	<b>4542.96</b>	<b>5940.47</b>	<p><u>Reply to lxii to lxvi</u></p> <p>GoTS has already infused the equity of INR 9,161 Cr., in addition to the subsidy, which is improving the cash flows of Discoms. TS Discoms would like to clarify that GoTS is also infusing the equity which is improving the cash flows of Discoms. This equity infusion has compensated the subsidy shortfall in FY 2018-19, FY 2019-20. From FY 2020-21 onwards, TS Discoms have been timely receiving the GoTS subsidy (as per FY 2018-19 Tariff Order), without any shortfall.</p> <p>TS Discoms disagree with the assumption considered by the objector for subsidy shortfall in FY 2021-22, due to the lack of sufficient information, and using the same to making an incorrect statement on subsidy shortfall, just to build their argument. The quarterly audited accounts are available on the Discoms' website.</p>
S. No.	Consumer category	SPDCL	NPDCL	Total																																						
1	LT I: Domestic	267.03	969.62	<b>1236.64</b>																																						
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Tariffs to be applicable for FY 2018-19, the same as per the Reference Tariff Schedule indicated above.

6.9.4 The DISCOMs should positively pursue for the release of the differential amount between the subsidy requirement communicated by the Commission vide its letter dated 28.02.2018 and the provisional subsidy amount communicated by GoTS vide its letter dated 24.03.2018. In case of non-commitment by GoTS for the release of the said differential amount by 30.09.2018, the DISCOMs shall file Petition(s) before the Commission seeking appropriate relief. The Commission shall take an appropriate view based on the scrutiny of the said Petition(s) of the DISCOMs”

(Emphasis supplied)

lxiv. It is observed from the Audited Accounts of TSSPDCL and TSNPDCL for FY 2018-19 that there has been a shortfall in the subsidy amount received from the Government of Telangana. Observably, this has been repeated for FY 2019-20 as well.

lxv. To the best of the Objector’s knowledge, despite the clear direction of the Hon’ble Commission to file a Petition seeking appropriate relief in case of non commitment by GoTS for the release of the said differential amount towards subsidy, the Petitioners have apparently not filed any such Petition. It is prayed that the Hon’ble Commission may take cognizance of such neglect of the Petitioners and reprimand them.

lxvi. The Objector has computed the shortfall in subsidy receivable from the GoTS for FY 2018-19 to FY 2021-22, as shown below:

FY	Subsidy claimed by Petitioner			Subsidy received from GoTS as per Audited Accounts			Shortfall		
	TSSPDCL	TSNPDCL	Total	TSSPDCL	TSNPDCL	Total	TSSPDCL	TSNPDCL	Total
FY19	1,397.50	4,254.15	5,651.65	1,172.56	3,569.40	4,741.96	224.94	684.75	909.69
FY20	1,397.50	4,254.15	5,651.65	1,172.00	3,569.40	4,741.40	225.50	684.75	910.25
FY21	1,397.50	4,254.15	5,651.65	1,397.50	4,254.15	5,651.65	-	-	-
FY22*	1,397.50	4,254.15	5,651.65	-	-	-	1,397.50	4,254.15	5,651.65
Total	5,590.00	17,016.60	22,606.60	3,742.06	11,392.95	15,135.01	1,847.94	5,623.65	7,471.59

\*Note: Due to lack of Audited Accounts for FY 2021-22, the subsidy received from GoTS has been taken as nil

lxvii. Notwithstanding the above, since the actual ACoS and Sales have changed from that approved for the Retail Supply Order for FY 2018-19, it is submitted that the actual subsidy requirement for FY 2018-19, FY 2019-20, FY 2020-21 and FY 2021-22 is also different from that approved as per Retail Supply Order for FY 2018-19. Accordingly, the Objector has assessed the indicative subsidy requirement based on the sales (actual for FY 2018-19, FY 2019-20, FY 2020-21, FY 2021-22 (H1) & projected for FY 2021-22 (H2)) of respective categories, the Average cost of supply and the revenue at the retail supply tariff:

TSSPDCL					
FY	Sales (LT-I & LT-V)	ACoS as per Petitioner	Revenue realized(LT-I & LTV)	Subsidy Requirement as per actual ACoS and Sales	Subsidy Claimed by Petitioner
	MU	Rs./kWh	Rs. Crore	Rs. Crore	Rs. Crore
2018-19	20739.14	5.91	3,818.92	8,437.91	1,397.50
2019-20	19528.04	6.91	4,208.10	9,285.78	1,397.50
2020-21	20656.69	7.17	4,257.00	10,553.84	1,397.50
2021-22	20884.59	7.12	4,382.00	10,487.83	1,397.50

TSNPDCL					
FY	Sales (LT-I & LT-V)	ACoS as per Petitioner	Revenue realized(LT-I & LTV)	Subsidy Requirement as per actual ACoS and Sales	Subsidy Claimed by Petitioner
	MU	Rs./kWh	Rs. Crore	Rs. Crore	Rs. Crore
2018-19	11396.86	6.31	1,179.81	6,011.61	4,254.15
2019-20	10685.12	7.07	1,351.60	6,202.78	4,252.15
2020-21	11672.05	7.20	1,536.00	6,867.88	4,254.15
2021-22	11801.44	7.56	1,588.00	7,333.89	4,254.15

lxviii. The Objector submits that the subsidy requirement for LT I and LT V categories ought to be based on the projected sales of respective categories and the Average cost of

Reply to lxvii, lxviii & lxix

While, TS Discoms understand the intention of the objector for computing the subsidy requirement, though, they haven't considered the positive cross-subsidy element that may be generated by the consumer categories with ABR more than the ACoS. Such cross-subsidy shall reduce the subsidy requirement to a certain extent.

As per the existing practice, the Hon'ble Commission computes the ACoS-ABR level for each consumer category, and after adjusting the positive and negative cross-subsidy throughout, arrives at the revenue gap and tries to balance the same with the GoTS subsidy commitment.

TS Discoms shall abide by the directions given by the Hon'ble Commission, and the subsidy commitments by the Govt. of Telangana, in this regard.

TS Discoms shall also improve its revenue by the following measures –



supply. As per the Objector, the subsidy receivable from Govt. of Telangana for FY 2022-23 is of the tune of Rs. 8,523.91 Crores for TSSPDCL and Rs. 5,319.30 Crores for TSNPDCL.

**Subsidy requirement for TSSPDCL for FY 2022-23**

Consumer Categories	Energy Sales	ACoS computed by Objector*	Cost to Serve	Projected Revenue Assessment	Subsidy Requirement
	MU	Rs./kWh	Rs. Crore	Rs. Crore	Rs. Crore
	A	B	$C = A \times B / 10$	D	$E = C - D$
LT (Domestic)	9,883.53	6.27	6,199.91	4,632.45	1,567.46
LT Agriculture	11,181.74	6.27	7,014.28	57.82	6,956.45
<b>Total</b>	<b>21,065.27</b>		<b>13,214.18</b>	<b>4,690.27</b>	<b>8,523.91</b>

**Subsidy requirement for TSNPDCL for FY 2022-23**

Consumer Categories	Energy Sales	ACoS computed by Objector*	Cost to Serve	Projected Revenue Assessment	Subsidy Requirement
	MU	Rs./kWh	Rs. Crore	Rs. Crore	Rs. Crore
	A	B	$C = A \times B / 10$	D	$E = C - D$
LT (Domestic)	4,258.99	5.95	2,534.74	1,637.35	897.39
LT Agriculture	7,523.81	5.95	4,477.79	55.88	4,421.91
<b>Total</b>	<b>11,782.80</b>		<b>7,012.53</b>	<b>1,693.23</b>	<b>5,319.30</b>

\*Note: The ACoS as computed by the Objector has been provided in the forthcoming sections.

lix. The Objector humbly submits that the Hon'ble Commission may consider the shortfall of subsidy receivable from the State of Telangana for FY 2018-19 till FY 2021-22 and the Subsidy Requirement for FY 2022-23 as assessed by the Objector (at paragraphs lxvi and lxvii respectively of the instant Objections) for the Telangana Discoms and allow the same in the instant proceedings towards the ARR for FY 2022-23 in line with the Section 65 of the Electricity Act, 2003.

- Conversion of remaining 20% non-IRDA services to IRDA services, leading to increase in Billing Efficiency

TS Discoms are preparing a scheme for installation of smart meters in a phased manner.

**13 PROPOSED TARIFF HIKE AND CROSS SUBSIDY**

lxx. The Telangana Discoms have proposed a significant hike in the tariff of all categories (except agriculture). The Objector submits that the State Government is free to provide

TS Discoms would like to state that the last tariff hike approved by the the Hon'ble commission was in FY 2016-17, While, it has been five years now since the last tariff hike, but in the said duration, all the costs

subsidised or free power to any class of consumers. However, it should provide full and commensurate subsidy in such cases and there is no occasion to subsidise the cost of supplying free power / subsidised power by imposing the burden on the industrial consumers through cross subsidy. The Objector submits that the proposed tariff hike increases the Cross-subsidy % beyond the permissible range of  $\pm 20\%$  as per the Tariff Policy, 2016.

Category	is per TSSPDCL Claim		
	Cross subsidy level @Existing tariff w.r.t. ACoS	Cross subsidy level @Proposed tariff w.r.t. ACoS	Cross subsidy level @Proposed tariff w.r.t. Voltage-wise CoS
HT I -11 kV	13%	34%	41%
HT I – 33kV	4%	29%	59%
HT I – 132 kV	-15%	9%	48%
	is per TSNPDCL Claim		
HT I -11 kV	17%	38%	64%
HT I – 33kV	10%	31%	56%
HT I – 132 kV	-14%	5%	26%

Ixxi. The Objector opposes the tariff hike proposed by the Telangana Discoms as the same is violative of the Electricity Act, 2003 and Tariff Policy, 2016.

Ixxii. Accordingly, 'Revenue changed through proposed tariff (incl. Cross Subsidy Surcharge & Additional Surcharge)' as claimed by Petitioners in their instant Petitions, amounting to Rs. 5,044.27 Crores for TSSPDCL and Rs. 1,786.63 Crores ought to be disallowed.

incurred by TS Discoms in terms of Power purchase cost, Transmission and Network cost etc. have increased significantly, leading to a constantly increasing revenue gap.

Covid Pandemic and also subsequent second wave has greatly impacted the finances of Discoms. The Policies of the Government of India have also led to the increase in costs due to clean cess, coal costs, railway freight etc.

In order to meet the revenue gap, Discoms have tried various methods including improving own operational efficiencies. The said revenue gap could be met by increasing the variable charges, fixed charges, customer charges etc.

TS Discoms shall also improve its revenue by the following measures –

- Conversion of remaining 20% non-IRDA services to IRDA services, leading to increase in Billing Efficiency
- TS Discoms are preparing a scheme for installation of smart meters in a phased manner Prepaid metering of its services, as per the timelines for replacement of existing meter with smart meters with prepayment feature, in accordance with the GoI notification.

TS Discoms have proposed done deliberate considerations, while proposing the tariff hikes for

		<p>different consumer categories and their respective sub-slabs. TS Discoms have carried out rigorous analysis on tariffs for various categories across states in India. It was found that the tariff for major LT and HT categories across voltage levels in all other major states in India like Gujarat, Uttar Pradesh, Madhya Pradesh, Rajasthan, Punjab, Maharashtra, Delhi, West Bengal etc. are higher as compared to Tariffs in Telangana.</p> <p>Hence, TS Discoms believe that the proposed tariff hike is inevitable and justified to improve its financial condition and better customer service and accordingly request the Hon'ble Commission to approve the same after due regulatory proceedings.</p>
14	<p><b>ADDITIONAL SURCHARGE</b></p> <p>Ixxiii. The Petitioner has stated that it has filed Petition before Hon'ble Commission for determination of Additional Surcharge for first Half (H1) of 2022-23 on 29.11.2021 in accordance to the TSERC order in OP No. 23 of 2020 dated 18.09.2020.</p> <p>Ixxiv. Accordingly, the Petitioner has estimated revenue from Additional Surcharge considering the proposals filed for H1 of FY22-23 at Rs. 4.06/kWh &amp; the proposals filed for H2 of FY21-22 at Rs. 2.34/kWh for H1 &amp; H2 of FY22-23 respectively.</p> <p>Ixxv. The Objector submits that these rates are not tenable and nowhere in line with the Additional Surcharge rates approved by the Hon'ble Commission for FY 2021-22 H2 which was Rs. 0.96/kWh and for previous years, which was Rs. 0.52/kWh. It is submitted that the Hon'ble Commission may disallow any arbitrary revenue increase on account of such exaggerated Additional Surcharge rates claimed by the Petitioner.</p> <p>Ixxvi. Furthermore, the Objector hereby brings to the notice of the Hon'ble Commission that there were several inadvertent errors apparent in the TSERC Order dated 24.12.2021 in O.P. No. 48-51 and IA No. 21-24 pertaining to computation of Additional Surcharge (AS)</p>	<p>The Hon'ble Commission in its order in OP No.23 of 2020 (pg 12) opined that the methodology of AS computation was approved in the Order dated 13.12.2017 in I.A.Nos.22&amp;23 of 2017 in O.P.Nos.22&amp;23 of 2016 respectively (AS Order for FY17-18) and the same have attained finality.</p> <p>The Discoms have duly adhered to the Commission's order in OP No.23 of 2020 for determining the Additional Surcharge for H1 &amp; H2 of FY21-22 and hence, proposed AS of Rs.2.01/unit and Rs.2.34/unit for H1 &amp; H2 of FY21-22. Hon'ble commission after considering the rebate of 60% have allowed the AS of Rs. 0.96/unit for 2021-22 H2.</p> <p>Similarly, for determining AS for H1 &amp; H2 of 2022-23, TS Discoms have followed the same methodology as</p>

<p>for H1 and H2 for TSSPDCL and TSNPDCL respectively. The same are described in brief as follows:</p> <ul style="list-style-type: none"> <li>• Fixed charges for stranded capacity: Strict prudence check of fixed charges for stranded capacity in terms of the regulatory process had to be carried out, but instead the amount recorded in the Audited Accounts has been taken at face value.</li> <li>• Inter-State Transmission Charges and SLDC Charges and</li> </ul> <p>Distribution Charges: In the case of transmission charges, only intrastate transmission charge ought to have been considered for the determination of Additional Surcharge. Despite this, it is observed that inter-state transmission charges and SLDC charges, have been considered.</p> <p>Further, the Distribution Cost at 11 kV, computed approximately as Rs. 0.69/unit, ought to be considered for the computation of Additional Surcharge, but instead the Hon'ble Commission has used Rs. 0.87/kWh.</p>	<p>approved by the commission in its order OP No.23 of 2020 for determining the Additional Surcharge lxxvi.</p> <p>Fixed charges: The Discoms had paid the fixed charges for the respective period as per the terms and conditions of PPAs and TSERC Regulation Terms and Conditions of Generation Tariff i.e., Reg. No. 1 of 2019</p> <p>Inter-State Transmission Charges and SLDC Charges and Distribution Charges: Hon'ble Commission in its order OP No.23 of 2020 (pg 12) opined that the methodology of AS computation was approved in the Order dated 13.12.2017 (which considers both intra &amp; inter state transmission charges)</p> <p>Hon'ble Commission also considered the same for determination of AS for FY 2018-19.</p> <p>There is no rationality in considering intra state transmission charges alone, as the Discoms have long term power purchase commitments with both intra and interstate generators thereby utilizing the intra and interstate transmission corridors. And, further the backing down of generation is not limited to intrastate generators alone. Hence, the transmission charges that are considered in totality are justified in arriving at per unit transmission charge</p> <p>The licensee computes the per unit Distribution cost in consonance with the commission's order in OP No.23 of 2020 dated 18.09.2020 and order for AS for FY17-18 dated 13.12.2017. It is also pertinent to mention that, the Hon'ble Commission considered the approved Distribution cost of FY16-17 i.e., Rs. 3,658.15 Cr. in arriving at the per unit distribution cost of</p>
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		Rs.0.71 per unit in the order for AS for FY17-18. In a similar way, the licensee has considered the approved distribution cost by the Hon'ble Commission in arriving the per unit distribution cost for 2021-22 and 2022-23 AS computation.																																																																				
15	<p>SUMMARY OF OBJECTOR'S ASSESSMENT OF ALLOWABLE ARR FOR FY 2022-23</p> <p>lxxvii. The ARR as per Objector's assessment vs Petitioner's submission are provided below:</p> <p>Summary of ARR for TSSPDCL for FY 2022-23 (All figures in Rs. Crores)</p> <table border="1"> <thead> <tr> <th>Particulars</th> <th>Petitioner's Claim</th> <th>Objector's Assessment</th> <th>Disallowance</th> </tr> </thead> <tbody> <tr> <td>Transmission Cost</td> <td>2,383.64</td> <td>2,383.64</td> <td>-</td> </tr> <tr> <td>SLDC Cost</td> <td>31.67</td> <td>31.67</td> <td>-</td> </tr> <tr> <td>Distribution Cost</td> <td>4,670.72</td> <td>3,269.50</td> <td>1,401.22</td> </tr> <tr> <td>PGCIL &amp; ULDC Expenses</td> <td>1,160.55</td> <td>1,062.96</td> <td>97.59</td> </tr> <tr> <td>Network and SLDC Cost (A)</td> <td>8,246.58</td> <td>6,747.77</td> <td>1,498.81</td> </tr> <tr> <td>Power Purchase / Procurement Cost</td> <td>26,411.20</td> <td>24,476.25</td> <td>1,934.95</td> </tr> <tr> <td>Interest on Consumer Security Deposits</td> <td>174.75</td> <td>174.75</td> <td>-</td> </tr> <tr> <td>Supply Margin in Retail Supply Business</td> <td>37.65</td> <td>37.65</td> <td>-</td> </tr> <tr> <td>Other Costs if any</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Supply Cost (B)</td> <td>26,623.60</td> <td>24,688.65</td> <td>1,934.95</td> </tr> <tr> <td>Aggregate Revenue Requirement (A+B)</td> <td>34,870.18</td> <td>31,436.42</td> <td>3,433.76</td> </tr> <tr> <td>Non-Tariff Income</td> <td>33.10</td> <td>810.02</td> <td>-776.92</td> </tr> <tr> <td>Net Revenue Requirement</td> <td>34,837.08</td> <td>30,626.40</td> <td>4,210.68</td> </tr> <tr> <td>Sales (MU)</td> <td>48,822.80</td> <td>48,822.80</td> <td>-</td> </tr> <tr> <td>ACoS (Rs./kWh)</td> <td>7.14</td> <td>6.27</td> <td>0.86</td> </tr> <tr> <td>Total Revenue</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Particulars	Petitioner's Claim	Objector's Assessment	Disallowance	Transmission Cost	2,383.64	2,383.64	-	SLDC Cost	31.67	31.67	-	Distribution Cost	4,670.72	3,269.50	1,401.22	PGCIL & ULDC Expenses	1,160.55	1,062.96	97.59	Network and SLDC Cost (A)	8,246.58	6,747.77	1,498.81	Power Purchase / Procurement Cost	26,411.20	24,476.25	1,934.95	Interest on Consumer Security Deposits	174.75	174.75	-	Supply Margin in Retail Supply Business	37.65	37.65	-	Other Costs if any	-	-	-	Supply Cost (B)	26,623.60	24,688.65	1,934.95	Aggregate Revenue Requirement (A+B)	34,870.18	31,436.42	3,433.76	Non-Tariff Income	33.10	810.02	-776.92	Net Revenue Requirement	34,837.08	30,626.40	4,210.68	Sales (MU)	48,822.80	48,822.80	-	ACoS (Rs./kWh)	7.14	6.27	0.86	Total Revenue				<p>TS Discoms have responded to the item-wise disallowances proposed by the objector, in the abovementioned sections, and would request the Hon'ble Commission to consider the projections shared by Discoms, considering the justifications shared on the same.</p> <p>TS Discoms believe that there would be a revenue gap at the existing tariffs and the same has to be met by proposing revenue hike.</p> <p>The last tariff hike was done five years ago and hence, TS Discoms believe that the proposed tariff hike is inevitable and justified to improve its financial condition and better customer service and accordingly request the Hon'ble Commission to approve the same after due regulatory proceedings.</p>
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Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)	25,708.48	25,708.48	-
Revenue Deficit(-)/Surplus(+) at Current Tariffs	-9,128.60	-4,917.92	-4,210.68
Government Subsidy u/s 65 of the Electricity Act, 2003	1,397.50	8,523.91	-7,126.41
Net gap – Deficit(-)/Surplus(+)	-7,731.10	3,605.99	-11,337.09
Revenue changed through proposed tariff (incl. Cross Subsidy Surcharge & Additional Surcharge)	5,044.27	-	5,044.27
Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2018-19	-	224.94	-224.94
Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2019-20	-	225.50	-225.50
Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2020-21	-	-	-
Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2021-22	-	1,397.50	-1,397.50
Net gap – Deficit(-)/Surplus(+) after Tariff Hike	-2,686.83	5,453.93	-8,140.76

**Summary of ARR for TSNPDCL for FY 2022-23**

Particulars	Petitioner's Claim	Objector's Assessment	Disallowance
Transmission Cost	1,005.43	1,005.43	-
SLDC Cost	13.23	13.23	-
Distribution Cost	3,601.25	2,520.88	1,080.38
PGCIL & ULDC Expenses	484.45	443.72	40.73
Network and SLDC Cost (A)	5,104.36	3,983.25	1,121.11
Power Purchase / Procurement Cost	13,003.88	11,925.95	1,077.93
Interest on Consumer Security Deposits	49.09	49.09	-
Supply Margin in Retail Supply Business	26.04	26.04	-
Other Costs if any	-	-	-

Supply Cost (B)	13,079.01	12,001.08	1,077.93
Aggregate Revenue Requirement (A+B)	18,183.37	15,984.33	2,199.04
Non-Tariff Income	29.41	567.18	-537.77
Net Revenue Requirement	18,153.96	15,417.15	2,736.81
Sales (MU)	25,904.66	25,904.66	-
ACoS (Rs./kWh)	7.01	5.95	1.06
Total Revenue			
Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)	10,702.76	10,702.76	-
Revenue Deficit(-)/Surplus(+) at Current Tariffs	-7,451.20	-4,714.39	-2,736.81
Government Subsidy u/s 65 of the Electricity Act, 2003	4,254.15	5,319.30	-1,065.15
Net gap – Deficit(-)/Surplus(+)	-3,197.05	604.91	-3,801.96
Revenue changed through proposed tariff (incl. Cross Subsidy Surcharge & Additional Surcharge)	1,786.63	-	1,786.63
Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2018-19	-	684.75	-684.75
Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2019-20	-	684.75	-684.75
Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2020-21	-	-	-
Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2021-22	-	4,254.15	-4,254.15
Net gap – Deficit(-)/Surplus(+) after Tariff Hike	-1,410.42	6,228.56	-7,638.98

Summary of ARR for Telangana State for FY 2022-23

(All figures in Rs. Crores)

Particulars	Petitioner's Claim	Objector's Assessment	Disallowance
Transmission Cost	3,389.07	3,389.07	-
SLDC Cost	44.90	44.90	-
Distribution Cost	8,271.97	5,790.38	2,481.59
PGCIL & ULDC Expenses	1,645.00	1,506.67	138.33
Network and SLDC Cost (A)	13,350.94	10,731.02	2,619.92
Power Purchase / Procurement Cost	39,415.08	36,402.20	3,012.88
Interest on Consumer Security Deposits	223.84		-
Supply Margin in Retail Supply Business	63.69		-
Other Costs if any	-		-
Supply Cost (B)	39,702.61	36,402.20	3,012.88
Aggregate Revenue Requirement (A+B)	53,053.55	47,133.22	5,632.80
Non-Tariff Income	62.51	1,377.20	-1,314.69
Net Revenue Requirement	52,991.04	45,756.02	6,947.49
Sales (MU)	74,727.46	74,727.46	
ACoS (Rs./kWh)	7.09	6.12	0.97
Total Revenue			
Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)	36,411.24	36,411.24	-
Revenue Deficit(-)/Surplus(+) at Current Tariffs	-16,579.80	-9,632.32	-6,947.49
Government Subsidy u/s 65 of the Electricity Act, 2003	5,651.65	13,843.21	-8,191.56
Net gap – Deficit(-)/Surplus(+)	-10,928.15	4,210.89	-15,139.05
Revenue changed through proposed tariff (incl. Cross Subsidy Surcharge & Additional Surcharge)	6,830.90	-	6,830.90



	Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2018-19	-	909.69	-909.69	
	Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2019-20	-	910.25	-910.25	
	Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2020-21	-	-	-	
	Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2021-22	-	5,651.65	-5,651.65	
	Net gap – Deficit(-)/Surplus(+) after Tariff Hike	-4,097.25	11,682.48	-15,779.74	
	<p>lxxviii. From the above analysis, it is observed that instead of an ARR deficit, rather, there is an ARR Surplus. On account of the same, there arises ought to be a tariff reduction instead of the tariff hike as proposed by the discoms. It is prayed that the Hon'ble Commission may allow tariff reduction accordingly.</p>				
16	<p><b>PROPOSED TIME OF DAY TARIFF</b></p> <p>lxxix. The Petitioner has proposed to reduce the ToD incentive for off-peak hours (10 PM to 6 AM) from Rs.1/unit to Rs.0.50/unit for the applicable categories viz.,</p> <p>HT-I Industrial, HT-II Others, HT-III Railways, Bus Stations &amp; Airports and HTIX EV Charging Stations. However, the Peak hours' charges are the same i.e. Rs. 1/unit. This translates into 29% hike in off-peak energy charges for HT consumers along with the proposed Tariff hike.</p> <p>lxxx. Furthermore, the Petitioners have failed to provide the load demand curves, scenario analysis, etc. for the proposed ToD Tariff mechanism.</p> <p>lxxxi. ToD cannot be a mechanism for the tariff hike. ToD is meant for Demand side management. Thus, it is prayed that the ToD Tariff proposed by the Petitioners may be disallowed.</p>				<p>In Telangana ToD (time of day tariff) was introduced as a demand management tool to address the issue of expensive power purchases made to cater to the demand during the peak hours.</p> <p>Later in 2016-17 tariff order the commission introduced the TOD Off peak incentive (Rs. -1/unit) for the consumers Time of Day tariff to aid in flattening of the day load curve while incentivizing off-peak hour consumption.</p> <p>TS Discoms have carried out an analysis on TOD Sales for HT Ind. &amp; HT Other categories for Peak, off Peak and Normal timings.</p> <p>It is observed that since the introduction of off-peak incentives there has been a shift of consumption from normal timings to the off-peak hours. In 2016-17 consumption during normal timings was 54%, which</p>

		<p>has been reduced to 34% for 2020-21. In line with the same consumption in off peak hours during 2016-17 was 21%, which has increased to 33% for 2020-21. Considering the above scenario TS Discoms are losing on the revenue.</p> <p>Further, Sales during peak hours didn't shift to the off-peak hours as much as expected since major industries are continuous loads operated during the peak hours which are not feasible being operated during off peak hours.</p> <p>Keeping demand side management &amp; Revenue requirements in mind TS Discoms have proposed to reduce the off peak incentive from Rs. 1/unit to Rs. 0.5/unit.</p> <p>Further, TS Discoms shall abide by the directions given by the Hon'ble Commission.</p>														
17	<p><b>PROPOSED CROSS SUBSIDY SURCHARGE</b></p> <p>lxxxii. The Petitioners have proposed the following Cross Subsidy Surcharge for FY 2022-23:</p> <table border="1" data-bbox="170 1019 905 1243"> <thead> <tr> <th rowspan="2">HT - Industry</th> <th colspan="2">Cross Subsidy Surcharge (Rs./kWh)</th> </tr> <tr> <th>TSSPDCL</th> <th>TSNPDCL</th> </tr> </thead> <tbody> <tr> <td>11 kV</td> <td>1.91</td> <td>1.03</td> </tr> <tr> <td>33 kV</td> <td>1.70</td> <td>1.84</td> </tr> <tr> <td>132 kV</td> <td>1.55</td> <td>1.47</td> </tr> </tbody> </table> <p>lxxxiii. As can be inferred from the table above, the Petitioner has proposed the CSS for HT consumers (esp. HT Industry- 33kV and 132 kV) above the maximum allowable limit as per the Tariff policy, as shown below:</p> <p>(All figures in Rs./kWh)</p>	HT - Industry	Cross Subsidy Surcharge (Rs./kWh)		TSSPDCL	TSNPDCL	11 kV	1.91	1.03	33 kV	1.70	1.84	132 kV	1.55	1.47	<p>As per the Section 8.3 of the Tariff Policy 2016, "the Appropriate Commission would notify a roadmap such that tariffs are brought within <math>\pm 20\%</math> of the average cost of supply". It is to be clarified that as per the above mentioned clause, the tariffs are to be brought within 20% of the ACoS and not within the Category based CoS.</p> <p>Further the TS Discoms while determining the CSS for all categories have taken minimum of 20% of category ABR and,</p> <ul style="list-style-type: none"> <li>• CSS calculated as per the methodology stated in the amended National Tariff Policy notified by the Ministry of Power on 28th January 2016 for determination of the cross-subsidy surcharge.</li> </ul>
HT - Industry	Cross Subsidy Surcharge (Rs./kWh)															
	TSSPDCL	TSNPDCL														
11 kV	1.91	1.03														
33 kV	1.70	1.84														
132 kV	1.55	1.47														

Discom	ACoS as per Objector's Assessment	Max Tariff as per NTP 2016 ( $\pm 20\%$ )	Max CSS allowable (20% of Max Tariff)
TSSPDCL	6.27	7.53	1.51
TSNPDCL	5.95	7.14	1.43

lxxxiv. The Objector prays that the Hon'ble Commission may rationalize the tariffs for industrial consumers and consequently, the cross-subsidy surcharge in adherence to the mandate of the National Tariff Policy, 2016. The relevant extract of the National Tariff Policy, 2016 is reproduced below:

"8.3 Tariff design: Linkage of tariffs to cost of service

...

2. For achieving the objective that the tariff progressively reflects the cost of supply of electricity, the Appropriate Commission would notify a roadmap such that tariffs are brought within  $\pm 20\%$  of the average cost of supply. The road map would also have intermediate milestones, based on the approach of a gradual reduction in cross subsidy.

...

Surcharge formula:

...

Provided that the surcharge shall not exceed 20% of the tariff applicable to the category of the consumers seeking open access."

(Emphasis supplied)

18	PARALLEL OPERATION CHARGES/GRID SUPPORT CHARGES	The Captive Power Plants continue to get connected to the licensee network system and operate their plant
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<p>lxxxv. The Petitioners in their instant Petitions have sought the introduction of Parallel Operation Charges/Grid Support Charges (GSC). The relevant extract of the Petition is reproduced below:</p> <p>“Proposal for Determination of Grid Support Charges for Telangana – FY 2022-23</p> <p>Based on the above submissions, the licensee feels that there is a need to levy Grid support charges on the Captive consumers in its area, for the benefits they are availing during its parallel operation with the licensee grid network. For the time being, the licensee humbly requests to the Hon’ble Commission to consider the methodology adopted in the APERC order</p> <p>08.02.2002 and subsequently upheld by Supreme Court via judgment dated 29.11.2019 as below “Persons operating Captive Power Plants (CPPs) in parallel with T.S. Grid have to pay ‘Grid Support Charges’ for FY 2022-23 on the difference between the capacity of CPP in kVA and the contracted Maximum Demand in kVA with Licensee and all other sources of supply, at a rate equal to 50% of the prevailing demand charge for HT Consumers. In case of CPPs exporting firm power to TSTRANSCO, the capacity, which is dedicated to such export, will also be additionally subtracted from the CPP capacity.”</p> <p>lxxxvi. The Hon’ble APERC, vide its Order dt. 08.02.2002, had approved the levy of GSC @ 50% of the applicable Demand Charges on the differential between the CPP capacity in KVA and the aggregate of the Contracted Minimum Demand (CMD) of the Captive Power Plant (CPP), quantum of power from other sources and also committed export quantum to the Grid, if any. The prevalent Demand Charges at the time were Rs. 170/kVA/Month.</p> <p>lxxxvii. Aggrieved, the matter was taken to the High Court and consequently to the Supreme Court. The Hon’ble Supreme Court, vide its Judgement dated 29.11.2019, upheld the right of the then Hon’ble APERC to approve the levy of GSC. During the pendency of the matter before the Supreme Court, Hon’ble APERC considered the matter of GSC while approving ARRs filed by DISCOMS/TRANSCO however without recognizing any revenue from GSC in the ARRs till FY 2008-09. No orders were issued in this matter.</p>	<p>in synchronism with the grid due to certain benefits which cannot be physically measurable. Thus the grid acts as the supporting system for the CPPs for its successful operation in terms of electrical performances. However, the grid support being an ancillary service extended by the licensee to the consumers, it has to be charged to the consumers who utilize the grid support.</p> <p>The grid support charges methodology which was approved in Tariff Orders up to FY 2008-09 is adopted and proposed for the FY 2022-23.</p> <p>As per the proposed grid charges conditions, the grid support charges will not be levied the entire capacity of CPP and it will be levied only on differential capacity between CPP capacity and CMD with Distribution Licensee. However, if the Captive Plant Capacity is less than or equal to contracted maximum demand with licensee, such captive power plant capacity will not attract grid support charges.</p> <p>Grid Support charges computation example:  Captive Capacity = 100 MVA = 100,000 kVA .....[a]  CMD with Distribution licensee = 90 MVA = 90,000 kVA.....[b]</p> <p>Differential capacity = [a-b] = 10 MVA = 10,000 kVA ....[c]  GSC (Rs. Cr.) = c * 50% of Demand charges</p>
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<p>lxxviii. The Petitioners, in their instant ARR Petitions for FY 2022-23, have proposed hiked up Demand Charges of Rs. 475/kVA/Month. The Petitioners, have also proposed that GSC should be levied @ 50% of the Demand Charges by the CPPs availing parallel operations. The levy is proposed on the differential between CPP capacity in KVA and the aggregate of CMD of CPP, drawl of power from other sources and committed export quantum. At the outset, Objector submits that the method of computation of GSC proposed by the Petitioners is itself baseless and arbitrary, and the consequent rate is exorbitantly high.</p> <p>lxxix. It is submitted that the GSC of other states such as Chhattisgarh, Gujarat and Madhya Pradesh, are in the range of Rs. 20-26.50/kVA/Month and the same have been approved only after due prudence check through third party analysis whether the Grid suffers any forbearance in providing parallel operations of CPPs.</p> <p>xc. The Objector submits that the original proposal for GSC was proposed by the Hon'ble APERC during the 1999-2002, when the Electricity Act was not in force. The Electricity Act came into force from 2003 and Section 9 of Electricity Act does not differentiate between CGP and IPP as far as grid connectivity is concerned and hence both ought to be treated equitably from the viewpoint of grid connectivity and support. Furthermore, during the time of original proposal for GSC, the generation shortfall was prevailing and the TSDISCOMS were going through occasional R&amp;C periods and frequency fluctuations, etc. However, the Telangana Grid has since improved in Grid size, availability of power and attained stability and is one of the few Grids in the country engaged in export of power on a steady basis.</p> <p>xci. The Grid situation therefore needs to be thoroughly reviewed with reference to the fact whether the Grid suffers any forbearance in providing parallel operations of CPPs. Such a review/study ought to be conducted on an armslength basis by an independent third party, taking into account the actual power harmonics, fault currents or load throwbacks as claimed by TSDISCOMS and also to arrive at a justifiable and reasonable charge based on actual cost / damage suffered by the Grid, if any, in providing such parallel operations to CPPs.</p> <p>xcii. In light of the same, it is prayed that the Hon'ble Commission may appoint an independent third party for conducting a thorough study of the grid for the necessity, evaluation and derivation of a reasonable rate towards Grid Support Charges. Till such</p>	$= 10000 * (50\% \text{ of say Rs. } 475) / 10^7$ $= \text{Rs. } 0.2375 \text{ Cr./ month}$ <p>Comparison of GSC with other states like Madhya Pradesh, Gujarat, Tamil Nadu, Chhattisgarh</p> <p>Consider GSC @ Rs. 25 / kVA / month  Captive Capacity = 100 MVA = 100,000 kVA  GSC (Rs. Cr.) = <math>25 * 100000 / 10^7</math>  = Rs. 0.25 Cr. / month</p> <p>Thus GSC determined by TS Discoms is very much justifiable.</p> <p>After enactment of Electricity Act 2003 also, the Hon'ble erstwhile APERC has approved grid support charges in respective Tariff Orders up to FY 2008-09.</p> <p>In view of the additional benefits than the normal other consumers, the CPPs who intended to use and benefit from parallel operation need to compensate through Grid Support charges.</p>
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	<p>independent study is conducted and results discussed with stakeholders through a consultation process, the GSC may not be imposed.</p>	
19	<p><b>FACILITATION CHARGES FOR OPEN ACCESS CONSUMERS</b></p> <p>xciii. The Petitioners have also proposed 'Facilitation Charges for Open Access Consumers' under their 'Other Tariff proposals':</p> <p>"Further, the cost implications on the Discom for facilitating Open Access to the Consumer/Generator are presented below:</p> <ul style="list-style-type: none"> <li>➤ More no. of skilled officials are involved at each stage of processing of open access facility to the Consumer/Generator like processing of application, study of network to provide feasibility, installation and commissioning of 3no.s ABT meters and metering equipments, its NABL and Periodical testing and an exclusive team of Engineers for analysis of ABT Meter dumps and Deviation settlements of energy of Open Access consumers/Generators. This will cause additional man hours involved in granting open access facility which in turn imposes the additional cost to the DISCOM.</li> <li>➤ Along with the additional cost on employee, it also imposes material cost like ABT meters special testing kits, MRIs and Laptops to collect the data from ABT meters, Computer systems at various stages of work, necessary infrastructure for the working of employees etc and its maintenance which impose O&amp;M cost to the DISCOM.</li> <li>➤ Cost implication on providing of dedicated Server, development of software applications for deviation settlements of energy and demand of the open access consumers/Generators as per the CERC Deviation settlement mechanism Regulations 2019 and its subsequent amendments, GPRS communication charges for collecting data from the meters, meter dump conversion tools of various makes like L&amp;T, Secure and Elster to convert raw dump data from meters for processing of deviation settlements and for analyzing of meters, etc.,</li> </ul> <p>From the above it is clear that, the consumer is getting benefit from the Open Access facility by getting cheaper power whereas the Discom is incurring excessive burden in the form of O&amp;M cost i.e., exclusive team of employees cost, additional infrastructure cost, etc., Further, the Open Access users are paying Rs.5000/- per application as operating charges to</p>	<p>TS Discoms have already mentioned the intention behind the introduction of the Facilitation Charges in their tariff proposal for FY 2022-23.</p> <p>TS Discoms would like to state that the consumer is getting benefit from the Open Access facility by getting cheaper power whereas the Discom is incurring excessive burden by rendering additional services in the form of O&amp;M cost i.e., exclusive team of employees cost, additional infrastructure cost, etc. Further, the Open Access users are paying Rs.5000/- per application as operating charges to SLDC only for monitoring their schedules of drawl/injection whereas the Discoms are not collecting any charges from the Open Access users even though lot of man hours are involved in granting Open Access, installation, testing of additional meters, MRI dumps collection, monitoring the injections/drawls of energy and working out the deviation settlements at various stages to avail Open access facility by the Open Access users.</p>

SLDC only for monitoring their schedules of drawl/injection where as the Discoms are not collecting any charges from the Open Access users even though lot of man hours are involved in granting Open Access, monitoring the injections/drawls of energy and working out the deviation settlements at various stages to avail Open access facility by the Open Access users.

In view of the above, the licensee proposes to introduce the "Facilitation Charges" of Rs. 20,000/- per month or part thereof (at a rate of 5% increment every year) for providing open access facility under the head "Other Charges in HT" in order to meet the cost being incurred in providing the Open Access facility to the Open Access users."

xciv. The Objector submits that the proposal for levy of any charges ought to be in accordance to the cost causation principle. The Objector provides the following comments on the apparent cost implications claimed by the Petitioners for levy of Open Access Facilitation Charges:

S. No.	Cost Implication as per Petitioner	Objector Comment
1.	Increase in Employee Cost	1. Employee cost forms a part of the O&M expenses for the Distribution Business. 2. Any increase in the employee
2.	Additional O&M Cost (Material Cost)	cost/additional O&M cost has to be claimed as a part of the ARR of Distribution Business and cannot be claimed in the form of separate charges directly in the Retail Supply Business Tariff Petition.

	<p>3. Cost implication on providing of dedicated Server, development of software applications for deviation settlements of energy and demand of the open access consumers/Generators as per the CERC Deviation settlement mechanism Regulations 2019</p>	<p>Such cost implication claimed by the Petitioner is apparently covered entirely under SAMAST (Scheduling, Metering, Accounting and Settlement of Transactions in Electricity) through the Power System Development Fund. The relevant document has been attached as Annexure-I. Point No. 8 on Page 12 of this document may be referred to in this regard.</p>	
<p>xcv. In light of the same, the Objector prays that the Hon'ble Commission may disallow the levy of 'Facilitation Charges on Open Access Consumers'.</p>			
<p>20</p>	<p><b>PRAYERS</b></p> <p>The Objector most respectfully prays that this Hon'ble Commission may be pleased to:</p> <p>A. Consider the above Objection Statement filed by the Objector;</p> <p>B. Disallow the power purchase cost as per the Objector's Assessment and in cases where the purchase has been projected at exorbitantly high price not relatable to the incumbent market situations;</p> <p>C. Reprimand the AP Discoms and issue a directive of disallowance or withholding of 30% of Distribution Cost claimed by the Petitioners on account of non-adherence to MYT Regulations and past directives of the Hon'ble Commission;</p> <p>D. Allow PGCIL and UDLC Charges as per Objector's Assessment;</p> <p>E. Align the Non-Tariff incomes strictly in line with the Audited Accounts and reduce it from the ARR being approved;</p> <p>F. Adjust the subsidy shortfall from the Govt. of Telangana as per Objector's Assessment for FY 2018-19 to FY 2021-22;</p> <p>G. Adjust the subsidy required from the Govt. of Telangana based on estimated consumption levels of subsidised categories such that the cost of supplying subsidised</p>		<p>TS Discoms have responded to the item-wise disallowances proposed by the objector, in the abovementioned sections, and would request the Hon'ble Commission to consider the projections shared by Discoms, considering the justifications shared on the same.</p>



power to select consumer categories is not borne by the other non-subsidised consumers in terms of adjustment of the revenue gap of FY 2022-23;

H. Approve the ARR by considering the total subsidy as prayed and assessed by the Objector in the detailed Objections Statement;

I. Rationalize the Tariff and Cross Subsidy to reflect a tariff reduction instead of a tariff hike as per the Cost of Supply, as proposed in the Objections Statement;

J. Disallow the proposed revenue from proposed tariffs and proposed additional surcharge as claimed by the Petitioner;

K. It is requested that the Hon'ble Commission may disallow any proposed modification in TOD;

L. Allow Cross Subsidy Surcharge as per the mandates of the National Tariff Policy 2016;

M. It is prayed that the Hon'ble Commission may appoint an independent third party for conducting a thorough study of the grid for the necessity, evaluation and derivation of a reasonable rate towards Parallel Operation Charges/Grid Support Charges (GSC). Till such independent study is conducted and results discussed with stakeholders through a consultation process, the GSC may not be imposed;

N. Objector prays that the Hon'ble Commission may disallow the levy of 'Facilitation Charges on Open Access Consumers';

O. Pass necessary orders as may be deemed appropriate in the facts and circumstances of the case in the interest of justice;

P. Permit the Objector to participate and make additional submission and produce additional details and documentations during the course of the online Public Hearings in the interest of justice and equity.

**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by Sri Saurabh Srivastava-Regulatory Affairs (Indain Energy Exchange Limited), Corporate Office; 9th Floor, Max Towers, Sectro 16B, Noida, Uttar Pradesh-201301.**

S.No.	Summary of Objections / Suggestions	Response of the Licensee																				
1	<p><b>I. Computation of CSS</b></p> <p><b>A. Computation of ABR</b></p> <p>i. TSSPDCL has computed CSS as the difference between the tariff (ABR) applicable to the relevant category of consumers and the cost of the distribution licensee to supply electricity to the applicable class of consumers.</p> <p>ii. On working out the category wise ABR based on category wise sales and revenue as provided by TSSPDCL, it is observed that a higher ABR has been considered in the Petition for HT industry- 132 KV category for the computation of CSS. The table below provides comparison of ABR proposed by TSSPDCL for FY 2022-23 against ABR worked out based on the details provided in the Petition.</p> <p>Table: 1- Comparison of ABR and Energy Sales</p> <table border="1" data-bbox="201 948 1157 1230"> <thead> <tr> <th data-bbox="201 948 394 1105">HT-I Industrial Category</th> <th data-bbox="394 948 575 1105">ABR proposed in the Petition (Rs./unit)</th> <th data-bbox="575 948 756 1105">Revenue (Rs. Cr) [a]</th> <th data-bbox="756 948 886 1105">Sales (MUs) [b]</th> <th data-bbox="886 948 1157 1105">Computed ABR (Rs./unit) [a/b*10]</th> </tr> </thead> <tbody> <tr> <td data-bbox="201 1105 394 1146">11 KV</td> <td data-bbox="394 1105 575 1146">9.54</td> <td data-bbox="575 1105 756 1146">4207.27</td> <td data-bbox="756 1105 886 1146">4409</td> <td data-bbox="886 1105 1157 1146">9.54</td> </tr> <tr> <td data-bbox="201 1146 394 1187">33 KV</td> <td data-bbox="394 1146 575 1187">8.51</td> <td data-bbox="575 1146 756 1187">4869.04</td> <td data-bbox="756 1146 886 1187">5721</td> <td data-bbox="886 1146 1157 1187">8.51</td> </tr> <tr> <td data-bbox="201 1187 394 1227">132 KV</td> <td data-bbox="394 1187 575 1227">7.74</td> <td data-bbox="575 1187 756 1227">2480.19</td> <td data-bbox="756 1187 886 1227">3535</td> <td data-bbox="886 1187 1157 1227">7.02</td> </tr> </tbody> </table> <p>iii. A higher ABR would result in disproportionately higher burden of CSS on the industries. Thus, the Hon'ble Commission is requested to assess the ABR while computing the CSS.</p>	HT-I Industrial Category	ABR proposed in the Petition (Rs./unit)	Revenue (Rs. Cr) [a]	Sales (MUs) [b]	Computed ABR (Rs./unit) [a/b*10]	11 KV	9.54	4207.27	4409	9.54	33 KV	8.51	4869.04	5721	8.51	132 KV	7.74	2480.19	3535	7.02	-
HT-I Industrial Category	ABR proposed in the Petition (Rs./unit)	Revenue (Rs. Cr) [a]	Sales (MUs) [b]	Computed ABR (Rs./unit) [a/b*10]																		
11 KV	9.54	4207.27	4409	9.54																		
33 KV	8.51	4869.04	5721	8.51																		
132 KV	7.74	2480.19	3535	7.02																		

S.No.	Summary of Objections / Suggestions	Response of the Licensee
2	<p><b>B. Non-Consideration of Transmission Charges and Losses</b></p> <p>i. The Petitioner in the present proposal has intended to compute Cross subsidy Surcharge (CSS) as per the methodology stated in the National Tariff Policy, 2016. The Petitioner has submitted the following in respect of computation of CSS:</p> <p><i>“3 Cross Subsidy Surcharge Proposals</i>  <i>3.1 Legal and Policy position– Cross Subsidy Surcharge</i>  .....  <i>The licensee has computed the Cross Subsidy Surcharge as per clause 8.5 of the National Tariff Policy notified on 28th January 2016.</i></p> <p><i>CSS is computed as the difference between the tariff applicable to the relevant category of consumers and the cost of the distribution licensee to supply electricity to the consumers of the applicable class.</i></p> <p><i>In case of a consumer opting for open access, the distribution licensee needs to be compensated on introduction of competition through open access. Accordingly, the cost of supply to the consumer for this purpose may be computed as the aggregate of</i></p> <p><i><b>a)</b> Per unit weighted average cost of power purchase including meeting the Renewable Purchase Obligation;</i></p> <p><i><b>b)</b> Transmission and distribution losses applicable to the relevant voltage level;</i></p>	<p>TS Discoms wants to state that they have considered the transmission charges and losses while computing the cost of supply of the consumer as per the described methodology in National Tariff Policy 2016.</p> <p>Ex. Transmission &amp; Distribution charges for 11 kV level (Rs. 1.95 /kWh) = 11 kV Distribution charges (Rs. 1.72/unit) + 132 kV Transmission charges (Rs. 0.22/unit)</p> <p>Likewise the calculations are also done for Transmission and Distribution losses.</p> <p>Backup calculation for all categories and voltages levels are also computed by discoms and have already been submitted before the Hon'ble Commission as a part of additional information.</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	<p><i>c) Transmission, distribution and wheeling charges up to the relevant voltage level;</i></p> <p><i>d) Per unit cost of carrying regulatory assets, if applicable. Surcharge formula (as per NTP, 2016):</i></p> <p><i>Where,</i></p> <ul style="list-style-type: none"> <li><i>- is the surcharge</i></li> <li><i>T - is the tariff payable by the relevant category of consumers including reflecting the Renewable Purchase Obligation;</i></li> <li><i>C - is the per unit weighted average cost of power purchase of by the Licensee, including meeting the Renewable Purchase Obligation;</i></li> <li><i>D - is the aggregate of transmission, distribution and wheeling charge applicable to the relevant voltage level;</i></li> <li><i>L - is the aggregate of transmission, distribution and commercial losses, expressed as a percentage applicable to the relevant voltage level; R - is per unit cost of carrying regulatory assets.</i></li> </ul> <p><i>....</i></p> <p><i>The licensee would like to file a proposal for determination of cross-subsidy surcharge for Open Access transactions along with this tariff filing duly adopting the methodology stated in the National Tariff Policy, 2016 for determination of the cross-subsidy surcharge."</i></p> <p><i>(Emphasis Added)</i></p>	

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	<p>ii. Though the Petitioner has intended to follow the methodology defined in the National Tariff Policy, 2016, it has not considered the transmission charges and losses while computing the cost of supply of the consumer as mentioned in the Petition (highlighted above).</p> <p>iii. In view of the above, the Hon'ble Commission is requested to assess the claim of the Petitioner w.r.t the computation of CSS, so as to determine CSS in line the National Tariff Policy, 2016.</p>	
3	<p><b>II. Short term procurement/sale through IEX</b></p> <p><b>A. Introduction of long duration contracts at the IEX</b></p> <p>i. The Government of India alluded to the imminent growth of short term market in the draft National Electricity Policy document issued in 2021. Several measures have been taken to achieve such objectives and a key among them is the resolution on introduction of long duration contracts at the power exchanges.</p> <p>ii. While hitherto, the short term procurement beyond 11 days of contract could be done by the Discoms through the trader/DEEP only, we submit that IEX is in the process of introducing longer duration contracts for delivery of power beyond 11 days at the exchange platform. These contracts will ensure delivery of nonconventional and conventional power beyond 11 days of trade for upto 1 year.</p> <p>As on date, the approval is pending before the Hon'ble CERC.</p> <p>iii. In view of the above, we request the Hon'ble Commission to consider and approve all the available options in the short term market for optimising power purchase costs as well as to meet the deficit requirements of the Discoms.</p>	<p>TS Discoms make note of the suggestions provided by the objector in the context of long duration contracts in the IEX.</p> <p>Telangana Discoms have a dedicated wing (Telangana State Power Coordination Committee) to focus on all the power purchase related matters of the Discoms.</p> <p>Under the purview of TSPCC, TS Discoms will explore the option of such long duration contracts in the IEX, post its approval by the CERC and subject to the directions provided by the Hon'ble Commission.</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
4	<p><b>B. Renewable Energy from Power Exchange</b></p> <p>i. The Distribution Licensees now have the option to either fulfil their RPO obligations by procuring RE power or sell surplus RE power in the short term market through Green-DAM and Green-TAM products available at IEX platform.</p> <p>ii. Green Day Ahead Market (GDAM) was introduced during FY 22 at IEX platform w.e.f. 26.10.2021 wherein Solar and Non-Solar renewable energy is being transacted. The buyers of this market will get Solar and Non-Solar RPO credit on the basis of proportion of the solar and non-solar bids of the sellers cleared in the total volume of the RE market. GTAM market was introduced in August 2020, wherein Solar and Non-Solar renewable energy is being transacted in intra-day, Day Ahead contingency, Daily and Weekly Contracts.</p> <p>iii. Presently GDAM segment has around 26 sellers and 40+ buyers participating in this market segment. GDAM and GTAM provide alternate market-based route to the RE generators to sell their green power and for the buyers to fulfil their RPO at competitive price with flexibility of entry and exit in the market.</p> <p>iv. The Discoms can make use of these market segments either to dispose their surplus RE or fulfil its RPPO target.</p>	<p>TS Discoms make note of the suggestions provided by the objector in the context of purchase/sale of RE in power exchange.</p> <p>Telangana Discoms have a dedicated wing (Telangana State Power Coordination Committee) to focus on all the power purchase related matters of the Discoms. Under the purview of TSPCC, TS Discoms have been utilizing the GDAM and GTAM products of IEX, for sale or purchase of green power.</p>
5	<p><b>III. Facilitation Charges for Open Access Charges</b></p> <p>A. The Petitioner has proposed to introduce "Facilitation Charges" of Rs. 20,000/- per month or part thereof (at a rate of 5% increment every year) for providing open access and to meet the cost being incurred by the Licensee in providing the Open Access facility to the Open Access users.</p> <p>B. As per the Electricity Act 2003 and the open access regulations of the Hon'ble Commission, the distribution licensee is mandated to provide non-discriminatory open access to its network to the consumers on payment of the</p>	<p>TS Discoms have already mentioned the intention behind the introduction of the Facilitation Charges in their tariff proposal for FY 2022-23.</p> <p>TS Discoms would like to state that the consumer is getting benefit from the Open Access facility by getting cheaper power whereas the Discom is incurring excessive burden by rendering additional services in the form of O&amp;M cost i.e., exclusive team of employees cost, additional infrastructure cost, etc. Further, the Open Access users are paying Rs.5000/- per application as operating charges to SLDC only for</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	<p>prescribed charges to the distribution licensee. The licensee is also ensured with the recovery of its entire wheeling cost in the ARR approved by the Hon'ble Commission, that includes the employee, administrative expenses etc., incurred towards providing the wheeling services to consumers.</p> <p>C. Further, the embedded open access consumers of the Licensee pay monthly fixed charges as per their contract demand and in accordance with the Hon'ble Commission's Tariff Order.</p> <p>D. Thus, the existing charges for granting open access, levied as per the open access regulations of the state, clearly take into account the efforts put in by the area Distribution licensee and may not need to be supplemented with additional charges as claimed by the Petitioner.</p> <p>We accordingly request the claim to be rejected by the Hon'ble Commission.</p>	<p>monitoring their schedules of drawl/injection whereas the Discoms are not collecting any charges from the Open Access users even though lot of man hours are involved in granting Open Access, installation, testing of additional meters, MRI dumps collection, monitoring the injections/drawls of energy and working out the deviation settlements at various stages to avail Open access facility by the Open Access users.</p> <p>TS Discoms would like to state that they are not able to recover the abovementioned additional costs incurred, through the levy of monthly fixed charges. Hence, TS Discoms request the Hon'ble Commission to allow the levy of facilitation charges in this regard.</p>

**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by M/s. Distributed Solar Power Association, Reg. Office:A-57, DDA Sheds, Okhla Industrial, Phase-II, New Delhi-110020**

S.No	Summary of Objections / Suggestions	Response of the Licensee
1	<p>While providing context for Parallel Operation with the Grid, the state Utilities have cited Chattisgarh State Electricity Regulatory Commission (CSERC) Discussion Paper on Determination of Parallel Operating Charges dtd. 01.06.2008 and Andhra Pradesh Electricity Regulatory Commission (APEREC) order dtd 08.02.2002 on Determination of Grid Support Charges. The relevant Clause 2.1.2 (Other Tariff Proposals) for FY 2022-23 is reproduced hereinbelow:</p> <p>“Persons Operating Captive Power Plants (CPPs) in parallel with the T.S. Grid have to pay ‘Grid Support Charges’ for FY 2022-23 on the difference between the capacity of CPP in KVA and the contracted maximum demand in kVA with licensee and all other sources of supply, at a rate equal to 50% of the prevailing demand charge for HT consumers. In case of CPPS exporting firm power to TSTRANSCO, the capacity, which is dedicated to such export, will also be additionally subtracted from the CPP capacity.”</p> <p>It is our submission that both these papers/ orders were drafted in the context of Captive Power Plants (CPP’s) – specifically from conventional sources of power i.e. coal, gas, bagasse, biomass etc which are firm in nature. Applying such principles to power plants operating on renewable sources – solar and wind, is fundamentally not justified given the infirm nature of renewable sources, which is a well-known and accepted fact.</p>	<p>The Captive Power Plants continue to get connected to the licensee network system and operate their plant in synchronism with the grid due to certain benefits which cannot be physically measurable. Thus the grid acts as the supporting system for the CPPs for its successful operation in terms of electrical performances. However, the grid support being an ancillary service extended by the licensee to the consumers, it has to be charged to the consumers who utilize the grid support.</p>



2	<p>The APERC order referred in this matter was drafted in 2002 and mainly applicable in the context of Captive Power Plants from conventional sources of energy – Coal, gas, bagasse etc. The formula suggested in this Order is relevant for instances where the capacity of Captive Power Plant may also be higher than the Contract Demand taken by the consumers from the grid. In case of Captive Power Plants from renewable sources, the consumers pays Demand Charges for the Contract Demand in the electricity bill. The utilities are adequately compensated by way of Demand Charges in such cases and so the Grid Support Charges over and above this would be an additional burden on the consumers.</p>	<p>The advantages of parallel operation with the grid are benefited by the CPPs in addition to other facilities of other industries. In view of the additional benefits than the normal other industries or others, the CPPs who intend to use and benefit from parallel operation need to compensate through Grid Support charges</p> <p>Hon'ble Supreme court in its order on Determination of Grid support charges dated 29.11.2019 upheld the Hon'ble APERC's order quoted above concerning Grid support charges. The licensee has proposed the same grid support charges methodology approved in APERC order dated 08.02.2002 which is upheld by the Hon'ble Supreme court of India.</p>
3	<p>The consumers who have already installed and are operating solar Captive Power Plants in the state of Telangana have done so under the guidelines/ regulations issued by the Hon'ble Commission in the state from time to time and with due approval of the state utilities. Any project which is operational under prevailing regulations with necessary approvals should not attract any new charges retrospectively. This would not be fair on consumers who have taken a progressive step towards installing renewable energy sources promoted by the various state and Central policies.</p> <p>It is also pertinent to note that other states like Maharashtra (vide MERC Order dtd. 30th March 2020 regarding Case No 322 of 2019) has decided not to levy Grid Support Charges on Consumers until solar installations in the state do not reach the target capacity set by the government. Rajasthan and Chhattisgarh have exempted renewable sources from the ambit of such Grid Support Charges.</p>	<p>The proposed grid support charges are 50% of prevailing demand charges for HT consumers on the differential capacity.</p> <p>If the Captive Plant Capacity is less than or equal to contracted maximum demand with licensee, such captive power plant capacity will not attract grid support charges.</p> <p>However, the proposed grid support charges will not applicable to solar rooftop services as its solar plant capacity is less than or equal to contracted maximum demand with licensee.</p> <p>TS Discoms want to state that they have never intended to obstruct the development and growth of Renewable Energy in the state by application of Grid Support charges. However, application of such charges is equally important to manage the grid stability. Which is the ultimate aim to get good quality reliable power.</p>

		<p>TS Discoms understands the environmental benefits of promoting the RE and have always actively participated in promoting green energy.</p>
4	<p>With respect to methodology of calculation of Cross Subsidy Surcharge (CSS), the computation provided under Clause 3.2 of the ARR ensures that the CSS keeps increasing when the installation base increases irrespective of the cost of power. Relevant portion of the Clause is referred hereinbelow:-</p> <p>“The Tariff Policy 2016 mandates SERCs to determine roadmap for reduction of cross subsidy and bring tariff at +/- 20% Average Cost of Supply, however it restricts Cross Subsidy Surcharge at 20% of the consumer tariff. In case the consumer tariff is more than 120% of Average Cost of Supply, DISCOM will not be able to recover losses through cross subsidy surcharge in case consumer opts for open access. It is essential for SERCs to implement both Para 8.3 -2 and First proviso to para 8.5.1 of the Tariff Policy 2016 simultaneously. If one of the provision could not be implemented due to some reason, the second provision should also not be implanted to that extent”</p> <p>Notably, the aforesaid methodology will disincentivize consumers to opt for OA as the savings will keep declining year after year and may turn negative after a certain period.</p> <p>In view of the aforesaid submission, we humbly request the Hon’ble Commission to consider the following:</p> <p>a) Reject the imposition of Grid Support Charges to consumers operating Captive Power Plants from renewable sources.</p> <p>b) Reject the restriction of the Cross Subsidy Surcharge at 20% of tariff payable by the consumer as the tariffs are not within +/-20% Average Cost of Supply. This will enable the</p>	<p>TS Discoms have been trying their level best to reduce their cross subsidy levels and abide by the provisions of the Tariff Policy 2016.</p> <p>As part of the Additional information submitted before the Hon’ble Commission, TS Discoms have requested the Hon’ble Commission to allow the DISCOMs to submit the action plan along with timelines for tariff simplification and rationalisation giving due consideration to the guiding principles and recommendations of Ministry of Power, Government of India in the ensuing ARR &amp; Tariff Filings.</p> <p>TS Discoms would like to state that the last tariff hike approved by the the Hon’ble commission was in FY 2016-17, While, it has been five years now since the last tariff hike, but in the said duration, all the costs incurred by TS Discoms in terms of Power purchase cost, Transmission and Network cost etc. have increased significantly, leading to a constantly increasing revenue gap. Covid Pandemic and also subsequent second wave has greatly impacted the finances of Discoms. The Policies of the Government of India have also led to the increase in costs due to clean cess, coal costs, railway freight etc. In order to meet the revenue gap, Discoms have tried various methods including improving their own operational efficiencies. The said revenue gap could be met by increasing the variable charges, fixed charges, customer charges etc. TS Discoms shall also improve its revenue by the following measures –</p> <ul style="list-style-type: none"> <li>• Conversion of remaining 20% non-IRDA services to IRDA services, leading to increase in Billing Efficiency</li> <li>• TS Discoms are preparing a scheme for installation of smart meters in a phased manner.</li> </ul> <p>TS Discoms have made deliberate considerations, while proposing tariff hikes for different consumer categories and their respective sub-slabs. TS Discoms have carried out rigorous analysis on tariffs for various categories across states in India. It was found that the tariff for major LT and HT categories across voltage levels in</p>

<p>licensee in fixing up cross subsidy surcharge without any under recovery.”</p>	<p>all other major states in India like Gujarat, Uttar Pradesh, Madhya Pradesh, Rajasthan, Punjab, Maharashtra, Delhi, West Bengal etc. are higher as compared to Tariffs in Telangana. Hence, TS Discoms believe that the proposed tariff hike is inevitable and justified to improve its financial condition and better customer service and accordingly request the Hon'ble Commission to approve the same after due regulatory proceedings.</p>
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**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by M/s. AMP Energy Private Ltd, Reg. Office:309, 3rd Floor, Rectangle One, Behind Sheraton Hotel,Saket, New Delhi-110017**

S.No	Summary of Objections / Suggestions	Response of the Licensee
1	<p>While providing context for Parallel Operation with the Grid, the state distribution companies (utilities) have referred to CSERC discussion paper on PoC determination dt. 01.06.2008, drafted in the context of CPP's based on firm sources of power (coal, gas, biomass etc) having surplus capacity over and above their own requirement and for Process industries having CPP's which run parallel to grid to avail continuous power supply in the event of CPP's failure to generate. Infirm sources of energy like solar and wind should not be brought under the ambit of such a regulation.</p>	<p>The Captive Power Plants continue to get connected to the licensee network system and operate their plant in synchronism with the grid due to certain benefits which cannot be physically measurable. Thus the grid acts as the supporting system for the CPPs for its successful operation in terms of electrical performances. However, the grid support c being an ancillary service extended by the licensee to the consumers, it has to be charged to the consumers who utilize the grid support.</p>
2	<p>It is important to note that, consumers operating Captive Power Plants based on solar are governed by Contract Demand limit. consumer's availing solar CPP are not allowed to reduce Contract Demand corresponding to the installed capacity of the solar CPP. On the contrary, consumers continue to pay Demand Charges for the Contract Demand even after availing solar power from Captive Power Plant. The Utilities are already compensated for this through the Demand Charges levied in the consumer's bill.</p> <p>This is unlike the consumer's referred in CSERC paper (dtd. 01.06.2008) whose Captive Power Plants were not governed by Contract Demand limits or consumers would avail Contract Demand from grid only to cater to demand over and above their load.</p>	<p>The advantages of parallel operation with the grid are benefited by the CPPs in addition to other facilities of other industries. In view of the additional benefits than the normal other industries or others, the CPPs who intend to use and benefit from parallel operation need to compensate through Grid Support charges</p> <p>If the Captive Plant Capacity is less than or equal to contracted maximum demand with licensee, such captive power plant capacity will not attract grid support charges. Hence, the proposed grid support charges in the ARR for FY 2022-23 will not applicable to solar rooftop services as its solar plant capacity is less than or equal to contracted maximum demand with licensee.</p>
3	<p>The Utilities also refer to APERC Order (dtd 08.02.2002) on Determination of Grid Support Charges in this ARR filing. It is important to note that this APERC order was issued before Electricity Act 2003 and was issued in the context of Captive Power Plants from firm source of power. The formula suggested in the APERC order also reflects the fact that Captive Power Plant capacity could be higher than the consumer's Contract Demand,</p>	<p>TS Discoms want to state that they have never intended to obstruct the development and growth of Renewable Energy in the state by</p>

	<p>which was possible in case of coal, gas, biomass, bagasse based Captive Power Plants. The same formula is not suitable to be applied to solar Captive power plants wherein the solar plant capacity would be lower than the Contract Demand in most cases.</p> <p>While Hon'ble Supreme Court has upheld the APERC order, however, applying such an order on renewable sources of power like wind and solar, which are infirm, is not justified and applying this retrospectively on operational solar Captive Power Plants is against economic principles.</p>	<p>application of Grid Support charges. However, application of such charges is equally important to manage the grid stability which is the ultimate aim to get good quality and reliable power.</p> <p>TS Discoms understands the environmental benefits of promoting the RE and have always actively participated in promoting green energy.</p>
4	<p>As per TSREDCO records, around 3,953 MW of solar power projects have been commissioned in Telangana as of 30.09.2021 which includes ground mounted, net metered and off-grid solar capacity.</p> <p>While Telangana Solar Policy 2015 envisages 2,000 MW of Rooftop solar power capacity to be installed in the state by 2021-22, it is important to note that only around 210 MW rooftop solar capacity has been cumulatively installed up to December 2021 in the state. This clearly shows there is potential for growth in the segment and the state is far from reaching its target. Levy of grid support charges at such juncture would be detrimental to the growth of the segment in the state</p>	<p>It is very clear that the Captive Plant's Capacity is less than or equal to contracted maximum demand with licensee, such captive power plant will not attract grid support charges. In case CPP capacity is more than the CMD with Discom, the proposed grid support charge will applicable.</p> <p>However, the proposed grid support charges will not applicable to solar rooftop services as its solar plant capacity is less than or equal to contracted maximum demand with licensee.</p>
5	<p>The Commission may also note that, in states like Maharashtra, MERC vide its Order dtd 30th March 2020 regarding Case No 322 of 2019, has clearly ruled against imposition of such Grid Support Charges until the target for rooftop solar power capacity set under the state government's solar policy is achieved in the state. States like Chhattisgarh and Rajasthan have exempted Grid Support Charges from being applicable on Captive Power Plants from Renewable sources. This is a step in the right direction and allow consumers to adopt renewable sources in the future.</p>	

**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by M/s. Mega Engineering & Infrastruters Ltd, S-2, Technocrat, Indl. Estate Balanagar, Hyderabad-500037**

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	<p>Megha, Engineering was established in the year 1989 headquartered at Hyderabad. Subsequently, in the year 2006, Megha Engineering &amp; Infrastructures Limited ("MEIL") was registered under the Companies Act, 1956. At present MEIL is executing many critical irrigation and water supply projects including Kaleshwaram, PRLIS, and JCR DLIS in the State of Telangana.</p> <p>The above mentioned projects, being executed by MEIL and its sub-contractors, are regularly consuming large quantities of power. By way of illustration, MEIL consumes, on an average, over 12,30,000 KWH per month for the works being done for the PRLIS Project. According to the current categorisation, all the power-supplied to the above-mentioned projects is being provided under HT-VII temporary category.</p> <p>However, the Objector's projects, which can be defined as 'large construction', are not in any manner similar to the kind of constructions defined at Clause 7.113. The construction activities defined at Clause 7.113 such as buildings, bridges, flyovers, roads etc. neither consume the kind of power that is consumed by the Objector nor is the consumption for a long period of time, unlike the Objector whose Projects, particularly, PRLIS and JCR DLIS have been running for over 5 years from 2015-16 onwards, and are continuing as on date. The objector would like to bring to the note of this Hon-ble Commission that such large-scale projects act more as an 'Industry' in terms of higher demand and the consistency of usage.</p> <p>It is submitted that this Hon'ble Commission had considered</p>	<p>In accordance with the Tariff Order issued by the Hon'ble Commission, the activity of construction is being categorized under HT-VII Temporary Supply and the relevant clause is presented below:</p> <p><i>"7.37/7.113 <b>Construction activities</b> like construction of <b>all types of structures/ infrastructure</b> such as residential /commercial buildings (height of 10 meters and above), bridges, fly-overs, dams, power stations, roads, aerodromes, tunnels for laying of pipelines, etc. The relevant <b>tariff for temporary supply shall be applicable</b> during the phase of construction. <b>Construction activities of structures of height less than 10 meters will fall under LT-II and HT-II, as relevant.</b>"</i></p> <p>Further, it is pertinent to mention that in most of the States viz; Gujarat, Delhi, Karnataka, Tamilnadu, West Bengal &amp; Madhya Pradesh, the activity of construction is categorized under Temporary Supply category only.</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	<p>construction to be in the nature of a temporary business for a period of around one or two years. While the same is apt for construction of buildings, bridges, roads, tunnels for laying pipelines etc., it would not hold true for large construction activities which take over 3-7 years to complete.</p> <p>It is submitted that similar large construction projects being undertaken by the Objector in the State of Andhra Pradesh for the Polavaram Irrigation Project is being treated under the HT-II(A) category and not under temporary supply.</p> <p>For the facts and circumstances stated above, the Objector humbly requests that large scale construction activities may be treated under the HT-I 'Industry' category of power consumption, or carve out a separate category as this Hon'ble Commission deems fit</p>	

**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by M/s. Penna Cement Industries Ltd Lakshmi Nivas 705, Road#3,Banjara Hills,Hyderabad-500034**

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p><b>Proposed New Tariff for HT Consumers</b></p> <p>The Telangana Discoms have proposed a significant hike in the tariff of all categories (except agriculture). We, object that the State Government is free to provide subsidised or free power to any class of consumers. However, it should provide full and commensurate subsidy in such cases and there is no occasion to subsidise the cost of supplying free power / subsidised power by imposing the burden on the industrial consumers through cross subsidy. The Objector submits that the proposed tariff hike increases the Cross-subsidy % beyond the permissible range of <math>\pm 20\%</math> as per the Tariff Policy, 2016.</p> <p>The Discoms have proposed an average hike of 20% for the HT consumers which will have drastic impact on the industrial activities in the state and also due to covid-19 pandemic situation all the industries are in difficult condition. Hence, we request to Hon'ble Commission not to hike the Tariff.</p>	<p>The last tariff hike in the state was approved by the the Hon'ble Commission in FY 2016-17. While, it has been five years now since the last tariff hike, but in the said duration, all the costs incurred by TS Discoms in terms of Power purchase cost, Transmission and Network cost etc. have increased significantly, leading to a constantly increasing revenue gap.</p> <p>Hence, TS Discoms believe that the proposed tariff hike is inevitable and justified to improve its financial condition and better customer service and accordingly request the Hon'ble Commission to approve the same after due regulatory proceedings.</p> <p>TS Discoms have carried out rigorous analysis on tariffs for various categories across states in India. It was found that the tariff for major HT categories across voltage levels in all other major states in India like Gujarat, Uttar Pradesh, Madhya Pradesh, Rajasthan, Punjab, Maharashtra, Delhi, West Bengal etc. are higher as compared to HT Tariff in Telangana.</p> <p>TS Discoms agree that COVID-19 has significantly impacted the economy and wellbeing of our state and nation. Having recognized that, TS Discoms had taken various steps to provide relief to its consumers, some of which are mentioned below -                      Meter reading were suspended with enforcement of national level lockdown in March 2020. Meter readings remained suspended till May and normal meter reading commenced from June 2020                      Controlling cost: Project work were reduced to minimum possible only in emergency cases                      Provisional Billing to LT consumers for April 2020</p>



		<p>Fixed Charges for Industries deferred till 31.05.2020 without any penalty and interest</p> <p>1% Rebate for HT Industries for payment within Due date (till 31.05.2020)</p> <ul style="list-style-type: none"> <li>• Deration of Contracted Load: A consumer can avail deration of the contracted load irrespective of the criteria of completion of minimum period of the agreement as stipulated in GTCS. Existing 3 months' notice period reduced to 30 days.</li> </ul>
2	<p>Computation of depreciation in accordance with CERC (Terms and Conditions of Tariff) Regulations, 2019.</p> <p>We request to Hon'ble Commission, ensure the DISCOM's to follow the computations Depreciation for each year of 4th control period in accordance with the CREC Tariff Regulations, 2019.</p>	<p>TS Discoms state that TSNPDCL have already adopted the CERC depreciation rates as per CERC (Terms and Conditions of Tariff) Regulations, 2019. TSNPDCL had recently filed their APR filing for 2020-21 on 31st Dec 2021, where Depreciation has been calculated as per CERC rates.</p> <p>TSSPDCL is in the process of adopting the CERC Depreciation rates.</p>
3	<p>New Time of Day (ToD) Tariff</p> <p>The Petitioner has proposed to reduce the ToD incentive for off-peak hours (10 PM to 6 AM) from Rs.1/unit to Rs.0.50/unit for the applicable categories viz., HT-I Industrial, HT-II Others, HT-III Railways, Bus Stations &amp; Airports and HT-IX EV Charging Stations. However, the Peak hours' charges are the same i.e. Rs. 1/unit. This translates into additional 5% hike in off-peak energy charges for HT consumers besides the proposed Tariff hike.</p> <p>ToD mechanism shall be on demand side management and not to consider as Tariff hike. We request to Hon'ble commission not change the ToD Tariff structure.</p>	<p>In Telangana ToD (time of day tariff) was introduced as a demand management tool to address the issue of expensive power purchases made to cater to the demand during the peak hours.</p> <p>Later in 2016-17 tariff order the commission introduced the TOD Off peak incentive (Rs. -1/unit) for the consumers Time of Day tariff to aid in flattening of the day load curve while incentivizing off-peak hour consumption.</p> <p>TS Discoms have carried out an analysis on TOD Sales for HT Ind. &amp; HT Other categories for Peak, off Peak and Normal timings.</p> <p>It is observed that since the introduction of off-peak incentives there has been a shift of consumption from normal timings to the off-peak hours. In 2016-17 consumption during normal timings was 54%, which has been reduced to 34% for 2020-21. In line with the same consumption in off peak hours during 2016-17 was 21%, which has increased to 33% for 2020-21. Considering the above scenario TS Discoms are losing on the revenue.</p> <p>Further, Sales during peak hours didn't shift to the off-peak hours as much as expected since major industries are continuous loads</p>

		<p>operated during the peak hours which are not feasible being operated during off peak hours.          Keeping demand side management &amp; Revenue requirements in mind TS Discoms have proposed to reduce the off peak incentive from Rs. 1/unit to Rs. 0.5/unit.          Further, TS Discoms shall abide by the directions given by the Hon'ble Commission.</p>
4	<p>Submission of Objections in the matter of TS DISCOM's proposal for determination of grid support charges for parallel operation of CPPs for FY 2022-23.</p> <p>We, Penna Cement Industries Limited, owning Captive Power Plant located at Ganeshpahad, Damarcherla, Nalgonda dist. is submitting our objections concern about the proposal of levy of Grid Support Charges by TS DISCOMS.</p> <p>Before going to the discussion of objections, it may please be noted that, before determination of GSC, The Hon'ble Chhattisgarh State Electricity Regulatory Commission (CSERC) has assigned this responsibility to an independent third party M/s. Electrical Research &amp; Development Association (ERDA) to study various system data and system parameters of representative selected CPPs. Accordingly ERDA has measured various system parameters like harmonics, unbalance current, plant load factor, load cycle, fault level calculations etc by measurement on selected CPPs and relevant substation and finally ERDA has suggested working out the parallel operation charges on sound technical basis taking into consideration advantages and disadvantages to both CPPs &amp; CSEB and submitted its recommendation to CSERC. Accordingly CSERC has determined Grid support charges Rs.21/KVA/Month vide Order dated 31.12.2008.</p> <p>We request the Hon'ble Commission to engage a similar independent reputed third party to conduct a thorough analysis of system study and technical issues concerning power load throwbacks by CPPS/consuming industries, power harmonics in parallel operation of CPPs, size of the CPPs</p>	<p>TS Discoms have followed the methodology adopted by APERC in its order dated 08.02.2002 for calculating Grid support charges. The same methodology was upheld by Supreme Court via judgment dated 29.11.2019 as below          "Persons operating Captive Power Plants (CPPs) in parallel with T.S. Grid have to pay 'Grid Support Charges' for FY 2022-23 on the difference between the capacity of CPP in kVA and the contracted Maximum Demand in kVA with Licensee and all other sources of supply, at a rate equal to 50% of the prevailing demand charge for HT Consumers. In case of CPPs exporting firm power to TSTRANSCO, the capacity, which is dedicated to such export, will also be additionally subtracted from the CPP capacity."          For the time being, the licensee humbly requests to the Hon'ble Commission to consider the above methodology.</p> <p>Further, TS Discoms shall abide by the directions given by the Hon'ble Commission.</p>

	and judiciously arrive at a reasonable charge as has been followed by other state utilities to arrive of the grid support charges/parallel operation charges. TS DISCOMS also should pursue this best practice to obtain an arm's length analysis and fair rates for all constituents.	
1	<p><b>Objections on Proposed Grid Support Charges:</b>The proposed grid support charges are not only arbitrary but also suffer from legal infirmity. There is no provision in Electricity Act, 2003 or in any Regulation of TSERC to determine Grid Support Charges or Parallel Operation Charges. The provision in Para 5.2.26 of National Electricity Policy 2005 notified by Govt of India which lay emphasis on grid connectivity of captive generators which is reproduced below:"</p> <p>"Under the Act, captive generators have access to licensees and would get access to consumers who are allowed open access. Grid inter-connection for captive generators shall be facilitated as per Section 30 of the Act. This should be done on priority basis to enable captive generation to become available as distributed generation along with the grid."</p>	<p>Supreme Court order dt. 29.11.2019, has empowered the State Regulatory Commissions, to levy the Grid Support charges. The same is also supported by various APTEL judgments (dt. 29.09.2015- Renuka Sugars v/s. GERC, PGVCL, Gujarat TRANSCO; dt. 18.02.2012- Chhattisgarh State Power Distribution v/s. Godawari Power &amp; Ispat Ltd) and SERC orders.</p> <p>Research paper on "Grid Support charges on Captive power plant", by K. Balaraman, Ananthapadmanabha, R. Nagraja, K. Parthasarthy; presented at IIT Madras – National Power System Conference 2004 also supports Technically the application of Grid Support Charges on Captive Power Plants.</p> <p>In view of the additional benefits than the normal other consumers, the CPPs who intended to use and benefit from parallel operation need to compensate through Grid Support charges. The said Grid Support charges are also one of the components in Retail Supply Tariffs and these charges are proposed to levy on the CPPs who intended to use and benefit from parallel operation. Hence the proposal of Grid Support charges for FY 2022-23 are well within the provisions of Act.</p> <p>The licensee has not denied CPPs access to the network, the captive generators who intended to use and benefit from parallel operation need to compensate through Grid Support charges.</p>
2	It is further submitted that as per the Electricity Act 2003, the usage or grid support of the transmission or distribution network is possible only by way of open access as provided under Sections 39 and 42 of the above Act. As per the said provisions, the transmission and distribution licensee is only mandated to levy transmission/wheeling charges upon the Captive users, or any other open access consumers. It is further submitted that in the event of the CPPs sources power for their captive user industries by laying down their own dedicated transmission lines, as per mitted under Section 9 of Electricity Act 2003, then even the aforesaid charges con not be levied.	
3	The Transmission system of the Transco/Discom should be so designed that it should take care of fluctuating load of the consumer as it is the duty of the transmission licensee under Section 40 of Electricity Act, 2003.	As per the proposed grid charges conditions, the grid support charges will not be levied on the entire capacity of CPP and it will be

	Moreover variation of load of a consumer having CPP is much less than a consumer without CPP.	levied only on differential capacity between CPP capacity and CMD with Distribution Licensee.
4	The unbalanced voltage of the grid is a source of negative phase sequence current which is absorbed by the generators of CPP.	Grid Support charges computation example: Captive Capacity = 100 MVA = 100,000 kVA .....[a] CMD with Distribution licensee = 90 MVA = 90,000 kVA.....[b]
5	Fault level depends upon the generation capacity connected to the grid. Since the CPPs constitute 50% of the generation capacity connected to the grid they are supposed to contribute to the increase fault level of the grid. The parallel operation of CPPs with the grid is highly beneficial otherwise during a fault the grid voltage would have collapsed.	Differential capacity = [a-b] = 10 MVA = 10,000 kVA ....[c] GSC (Rs. Cr.) = c * 50% of Demand charges = 10000 * (50% of say Rs. 475) / 10 <sup>7</sup> = Rs. 0.2375 Cr./ month
6	As per Regulations of Supply Code, Industries having CPPs can draw emergency power up to the capacity of largest generating unit by paying required tariff. Therefore, it is not a support of the grid as claimed by the Petitioner. CPP's drawl of power is limited to "start-up power" when there is total loss of generation of the CPP. The drawl of power for production purposes, is limited to the CMD as per the Power Supply Agreement with the DISCOM. Otherwise penalty is attracted. Overdrawl is prevented by proper setting of the relay at the Grid Sub-station. Due to injection of power by CPPs the load on the transformers in the grid reduces resulting in less transformer loss."	Comparison of GSC with other states like Madhya Pradesh, Gujarat, Tamil Nadu Chattisgarh  Consider GSC @ Rs. 25 / kVA / month Captive Capacity = 100 MVA = 100,000 kVA GSC (Rs. Cr.) = 25 * 100000 / 10 <sup>7</sup> = Rs. 0.25 Cr. / month
7	The CPP are acting as distributed generator at the load center for which the transmission and distribution loss has been reduced to great extent. Further since all the cost of the transmission utility is being covered by the Commission while approval of Annual Revenue Requirement (ARR) of the utility there is no scope of levying such additional charges on the consumers. On the contrary to the claim of DISCOMS that the CPPs which are connected with the grid are getting benefits, we are facing lot of problems due to irregularities of grid operation by TRANSCO.	Thus GSC determined by TS Discoms is very much justifiable.  The grid support charges are not for drawl of power from the Distribution Licensee, but for utilization of parallel operation benefits by captive generators. However, if the Captive Plant Capacity is less than or equal to contracted maximum demand with licensee, such captive power plant capacity will not attract grid support charges. The licensee has not denied CPPs access to the network; the captive generators who intended to use and benefit from parallel operation need to compensate through Grid Support charges.
8	Transco being the State Transmission Utility (STU) has the responsibility to maintain the network system of the state as per Sec.39 and 40 of Electricity Act, 2003. As per Regulation Grid Code, all the users or prospective users of STU are to be treated equal. Further Section 9 of Electricity Act, 2003	The advantages of parallel operation with the grid are benefited by the CPPs in addition to other facilities of other consumers. In view of

	does not difference between CPP and IPP as far as grid connectivity is concerned and hence both should be treated equitably from the viewpoint of grid connectivity and support. Moreover industries owning arc furnaces and rolling mills but without CPPs creates much bigger problems and create pollutions in the state grid as compared to an industry having a CPP. The fluctuation in the load, generation of odd harmonics is technically issues which are common for industries with CPPs and without CPPs.	the additional benefits than the normal other consumers, the CPPs who intended to use and benefit from parallel operation need to compensate through Grid Support charges. The said Grid Support charges are also one of the components in Retail Supply Tariffs and these charges are proposed to levy on the CPPs who intended to use and benefit from parallel operation. Hence the proposal of Grid Support charges for FY 2022-23 are well within the provisions of Act.				
9	Just as in the case of APERC Original proposal when GSC was proposed at 50% of the then applicable Demand Charge of Rs. 170 per KVA during the year 2002, the current proposal of 50% of the Demand Charge of Rs. 475 per KVA per month is also not supported by any data proving that the grid suffered to this extent in providing parallel operations to CPPs.	In the erstwhile APERC approved Grid Support charges in the Order is 50% of the prevailing demand charge for HT Consumers. The demand charges of the HT consumers are changed from time to time as per Tariff Orders. The proposed grid support charges in the ARR & Tariff proposal of the licensee is also same as approved in erstwhile APERC orders i.e., 50% of the prevailing demand charge for HT Consumers.				
10	CPPs involve heavy capital investments and are necessitated to provide fillip to the main consumption industry utilizing captive power at reasonable rate as opposed to fluctuating and ever-increasing grid tariff.	The advantages of parallel operation with the grid are benefited by the CPPs in addition to other facilities of other consumers. In view of the additional benefits than the normal other consumers, the CPPs who intended to use and benefit from parallel operation need to compensate through Grid Support charges.				
11	The proposed levy of GSC aims to stifle the consuming industries by this arbitrary levy, which in turn erodes the viability of the principal industry to a point that it must perforce cease operations.					
12	The CPPs who are predominantly coal-fired, are already subjected to substantial increases in coal cost being supplied by the State mining companies and have no window to absorb such high levies such as the proposed GSC.					
13	CPPs have repeatedly expressed their willingness to provide additional protections in their facilities as desired by the grid to see that no untoward load throwbacks or fault currents or reactive power surges happen.	No comments				
14	The prevailing parallel operation charge which is equivalent to the proposed GSC in other States is as follows: <table border="1" data-bbox="199 1339 976 1412"> <thead> <tr> <th>Name of the State</th> <th>Grid Support Charges Rs/KVA/Month</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Name of the State	Grid Support Charges Rs/KVA/Month			Hon'ble Supreme court in its order on Determination of Grid support charges dated 29.11.2019 upheld the Hon'ble APERC's order quoted above concerning Grid support charges. The licensee has proposed the same grid support charges methodology approved in APERC
Name of the State	Grid Support Charges Rs/KVA/Month					

	Madhya Pradesh	Rs.20/KVA/Month		<p>order dated 08.02.2002 which is upheld by the Hon'ble Supreme court of India.</p> <p>Grid Support charges computation example:  Captive Capacity = 100 MVA = 100,000 kVA .....[a]  CMD with Distribution licensee = 90 MVA = 90,000 kVA.....[b]</p> <p>Differential capacity = [a-b] = 10 MVA = 10,000 kVA ....[c]  GSC (Rs. Cr.) = c * 50% of Demand charges  = 10000 * (50% of say Rs. 475) / 10<sup>7</sup>  = Rs. 0.2375 Cr./ month</p> <p>Comparison of GSC with other states like Madhya Pradesh, Gujarat, Tamil Nadu Chattisgarh  Consider GSC @ Rs. 25 / kVA / month  Captive Capacity = 100 MVA = 100,000 kVA  GSC (Rs. Cr.) = 25 * 100000 / 10<sup>7</sup>  = Rs. 0.25 Cr. / month</p> <p>Thus GSC determined by TS Discoms is very much justifiable.  Research paper on "Grid Support charges on Captive power plant", by K. Balaraman, Ananthapadmanabha, R. Nagraja, K. Parthasarthy; presented at IIT Madras – National Power System Conference 2004 also supports Technically the application of Grid Support Charges on Captive Power Plants where in the Grid Support charges can be a certain percentage of fixed charges chargeable by the licensee to the consumers.</p>
	RERC	Rs.20/KvA/Month		
	Gujarat	Rs.26/KVA/Month		
	Tamilnadu	Rs.30/KVA/Month		
	J&K	Rs.16/- per kVA per month on the installed capacity of the CPP		
	Odisha	Nil		
	West Bengal	Nil		
	Kerala	Nil		
	Karnataka	Nil		
	<p>The above utilities have proposed these rates after third party analysis.  From the above table it can be seen that the parallel operation charge or GSC in other States has been worked out based on clear parameters of the costs incurred by the Grid and so are considered reasonable as against the proposed levy of 50% of the Demand Charge of Rs. 475 per KVA per month, proposed by TS Discoms. The proposed levy has no basis and is grossly excessive, arbitrary, and so requires be reducing substantially and validating by an independent third-party analysis. What is the basis and methodology adopted while arriving GSC 50% of demand charges.</p>			
15	<p>Most of the CPPs installed capacities are much higher when compared to their captive load. When the installed capacity / operating capacity of captive load is much lower than installed Capacity of Power plant, it is very unfair to impose GSC based on the installed capacity of CPP. The proposed grid support charges computation as "difference between the capacity of CPP in kVA and the contracted Maximum Demand in kVA with Licensee and all other sources of supply, at a rate equal to 50% of the prevailing demand charge for HT Consumers. In case of CPPs exporting firm power to TSTRANSCO, the capacity, which is dedicated to such export, will also be</p>			<p>The proposed grid support charges are very negligible per unit in respect of generation of captive power plants. However, if the Captive Plant Capacity is less than or equal to contracted maximum demand with licensee, such captive power plant capacity will not attract grid support charges.</p> <p>The grid support charges methodology which was approved in Tariff Orders up to FY 2008-09 is adopted and proposed for the FY 2022-23.</p>

	<p>additionally subtracted from the CPP capacity". We request to Hon'ble commission to consider the Captive Demand instead of difference between installed capacity of CPP and CMD of CPP.</p>	<p>As per the proposed Grid Support Charges, in case of CPPs exporting firm power to TSTRANSCO, the capacity, which is dedicated to such export, will also be additionally subtracted from the CPP capacity while calculating grid support charges.</p>
16	<p>The proposed levy of GSC at such a high rate will be a death knell for large process industries which depend upon captive power at reasonable cost. The proposed GSC will hit at the core viability of the principal industry resulting in closure of operations and in loss of direct and indirect employment aside from loss of revenue to the exchequer.</p>	
17	<p>We object the proposed levy on Captive Power Plants (CPPs) inter alia alleging that the levy was devoid of merits, excessive; that there was no evidence of actual forbearance / costs /damages on the part of the grid on account of CPPs running parallel operation and if at all, it was only for export of surplus power from CPPs. We also claim that we have adequate protections against any power load throwback within the permitted time intervals under the grid code and accordingly refuted the claim of TS DISCOMS as being without merits.</p>	

**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by Sri G.Sriram, Sainagar, Nagole, Hyderabad**

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>In response to the tariff proposals made by the DISCOMs, I would like to make a suggestion to reduce the financial burden on DISCOMs and also Government (on account of subsidy) while making the DISCOMS viable financially. This may be forwarded to the Government for favourable orders. Government is giving free power agriculture. Such power is for the purpose of cultivation through motors. Government is spending so much on this account in the form of subsidy. On the other hand, the consumption on account of agriculture is not available to the DISCOMs, as the figure is a derived consumption than actual consumption. Tapping the natural potential is need of the day, as it is cheap and abundant. Only thing which is required is the strong will to tap such potential. Installation of Solar water motors for agricultural sector will solve the problem of “free power” and tapping the natural potential.</p> <p>Next question that comes to mind is how to meet the capital expenditure on account of purchase of solar water motors. There could be two alternatives for such capital expenditure. One is to explore any Central Government funded schemes or the State Government schemes. I find a scheme of Government of Telangana in this regard. The scheme of Rytu Bandhu. Government is giving away crores of rupees to the farmers, without knowing its purpose of spending. Instead of sparing such crores of rupees without knowing the purpose of spending, it is better to give away the solar motors in one year in place of Rytu Bandhu. Next year being the election year, it may not be possible to do this as Rytu Bandhu needs to be continued as it is. The amount spent on this account is for capital expenditure of purchase of solar motors. On installation, Government can reduce or save the amount that is being spent on account of agriculture subsidy. On the other hand, DISCOMs are not burdened on free supply as the motors run on the own electricity generated. I sincerely request TSERC to pursue the issue with the Government, enabling them to implement as the power purchase cost can be saved by this system.</p>	<p>TS Discoms make note of the suggestions provided by the objector.</p> <p>The proposition made by the objector is in line with the Component C of PM KUSUM scheme of Govt. of India.</p> <p>TS Discoms are participating in the Component A of PM KUSUM scheme, with an allocation of 500 MW issued from MNRE.</p> <p>Component C (Part I) of PM KUSUM scheme, hasn't picked up to the expected level in majority of the states, as there are ambiguities on the capital contribution from the state governments (30%) and the inability of farmers to raise the balance capital cost (40%).</p> <p>Regarding Component C (Part II) of the PM KUSUM scheme, TS Discoms had requested MNRE to exempt incentivizing the farmers in Telangana state, given the unique situation with 24x7 free power supply given to agriculture consumers. The request by TS Discoms was not accepted by MNRE. Hence, TS Discoms have surrendered its allocation of 65,000 pumps to MNRE, for KUSUM Component C (feeder level solarisation)</p> <p>TS Discoms haven't explored the GoTS Rytu Bandhu scheme for meeting the capex requirement of solar motors.</p>



**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by Sri Ankit Maheshwari, Fortum Charge and Drive India Private Limited, The Oberoi Centre, Building 11, Level 6, DLF Cyber City, Phase 2, Gurugram – 122002.**

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>Hon commission, TSERC in 2018 had ordered single part tariff for a minimum period of 3 years to spur electric mobility in Telangana. Though the minimum period is coming to a close, we request to extend the single-part tariff structure (EV tariff LTIX and HTIX) to atleast until 2025, as the last 3 years have not spurred optimal demand.</p> <p>The same has been suggested by Ministry of Power guidelines dated 14 Jan 2022, in which clause 7.1 quotes “ The tariff for supply of electricity to Public EV Charging Stations shall be a single part tariff and shall not exceed the "Average Cost of Supply" till 31st March, 2025”. We thus request TSSPDCL and Hon Commission, TSERC to provide a single part tariff at ACOS (and no fixed charges) as proposed under this ARR. The other charges proposed by TSSPDCL like monthly minimum charges (single/three phase) on both LTIX and HTIX shall have a huge bearing on individuals and organizations wanting to contribute to development of EV charging infrastructure in these nascent time, when the demand is much lesser than anticipated. The covid scenario since 2020 has also dampened sentiments of EV adoption and we sincerely request you to extend the current EV tariff at LTIX and HTIX until 2025.</p>	<p>The last tariff hike in the state was approved by the Hon’ble Commission in FY 2016-17. While, it has been five years now since the last tariff hike, but in the said duration, all the costs incurred by TS Discoms in terms of Power purchase cost, Transmission and Network cost etc. have increased significantly, leading to a constantly increasing revenue gap. Hence, TS Discoms believe that the proposed tariff hike is inevitable and justified to improve its financial condition and better customer service and accordingly request the Hon’ble Commission to approve the same after due regulatory proceedings.</p> <p>Under Telangana EV &amp; ESS policy 2020-30, TS has already committed to attract investments worth \$ 4.0 Billion and create employment for 120,000 persons by year 2030; Generate demand for battery storage solutions by driving EV adoption incentives and supply side incentives for battery manufacturing; To proactively support creation of EV charging Infrastructure in the initial phase and eventually create market for commercially viable EV Charging business.</p> <p>In addition to above TS have provisions for huge demand side incentive, Charging infra. incentives and EV manufacturing incentives.</p> <p>TS Discoms want to state that the current proposed Energy charges for EVs category Rs. 7.00/unit is less than the ACoS (Rs. 7.10/unit for TS Discoms). TS Discoms have proposed Fixed charge for this category on par with other categories. Also, other states in the country have also proposed fixed charges for EV category like Karnataka, Gujarat, MP, Haryana, Rajasthan, Maharashtra etc.</p> <p>Having said that, TS Discoms make note of the references shared by the objector on the tariffs for EV, and shall abide by the directions given by the Hon’ble Commission, as it deems fit.</p>
2	<p>The above guidelines also clearly suggests supply at “average cost of supply until 31 March 2022”, hence we request the honorary commission (TSERC) and TSSPDCL to provision the input tariff at LTIX and HTIX at or lower than avg cost of supply. Hon Commission in 2018 had stipulated lower than ACOS to spur demand and we sincerely request to extend the same principles until 2025 atleast.</p>	<p>Having said that, TS Discoms make note of the references shared by the objector on the tariffs for EV, and shall abide by the directions given by the Hon’ble Commission, as it deems fit.</p>

3	We direct your kind attention to clause 2.1(i) of MOP guidelines which states "Public Charging Station shall be provided within time period not exceeding seven days in metro cities, fifteen days in other municipal areas and thirty days in rural areas". We request you to kindly provide a defined timeline for this activity	TS Discoms make a note of the request raised by the objector and try to release the connection to PCS as early as possible. TS Discoms shall abide by the directions given by the Hon'ble Commission.
4	We also direct your kind attention to Clause 2.2 of MOP guidelines stating " Any Public Charging Station/ Chain of Charging Stations may obtain electricity from any generation company through open access" .We sincerely request TSSPDCL and Hon commission to relax the open access procurement restrictions to 20kW specially for EV charging stations. Moreso, we request the Hon commission to aggregate EV charging load in the State of Telangana from single point of supply to multiple under aggregation mode.	As per Regulation 2 Of 2005, Open Access Terms and Conditions dated July 1, 2005, clause 8.1 mentions the eligibility criteria for getting open access. As per the said clause open access can be granted for contracted capacity greater than 1 MW, provided the commission may allow Open access to the consumers of capacity 1 MW or less in due course of time.  TS Discoms shall abide by the directions given by the Hon'ble Commission.

**Objections / Suggestions received from Sri Saurobroto Dutta, Associate Advocate, Hemanth Shah Associaes,  
(Fortum Charge & Drive India (P) Ltd., 81/1, Adchini, Sri Aurobindo Marg, New Delhi – 110017**

SL. No.	Summary of Objections / Suggestions	Response of the Licensee
1.	<p>We are the counsel on behalf of Fortum Charge &amp; Drive India (P) Ltd., and intend to draw attention of the Hon'ble Telangana Electricity Regulatory Commission with reference to the public notice issued on 29.12.2021.</p> <p>As per the public notice dated 29.12.2021, it was informed that the Southern Power Distribution Company of Telangana Limited has invited objections/comments to the Aggregate Revenue REquireent (ARR) and Filings for Proposed Tariff (FPT) for the Retail Supply Business for the financial year 2022-23. That the said public notice further states that the objections/comments along with the relevant documents is supposed to be submitted with the Hon'ble TSERC on 28.01.2022 by 5:00 PM. In this regard, please be informed that we have received our mandate for filing the objections/comments on 24.01.2022 and are facing dicciulty of time constraiant for filing the same by today.</p> <p>As per our discussion, it is respectfully informed that we are in the process of drafting the objections and the final version of the same shall be submitted on 31.01.2022. We hereby humbly request before this Hon'ble Commission to allow us an extension to file our comments/objections along with the relevant material by 31.01.2022</p> <p>Kindly let us know if any further assistance is equired at our end.</p>	<p>The matter is in the jurisdiction of Hon'ble Commission.</p>

**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by M/s. Nava Bharat Ventures Ltd, Nava Bharat Chambers, Raj Bhavan Road, Hyderabad-500082**

S.No	Summary of Objections / Suggestions	Response of the Licensee
1	<p>While filing the Tariff Proposals (ARR) for FY 2022-23, The Distribution Licensees in Telangana have proposed, inter alia, a levy of Grid Support Charges on Captive Power Plants (CPPs) in Telangana for parallel operation with Grid as mentioned below.</p> <p>"Persons operating Captive Power Plants (CPPs) in parallel with T.S. Grid have to pay 'Grid Support Charges 'for FY 2022-23 on the difference between the capacity of CPP in kVA and the contracted Maximum Demand in kVA with Licensee and all other sources of supply, at a rate equal to 50% of the prevailing demand charge for HT Consumers. In case of CPPs exporting firm power to TSTRANSCO, the ix capacity, which is dedicated to such export, will also be additionally subtracted from the CPP capacity.</p> <p>In the ARR, The DISCOMS considered the erstwhile APERC's Order dated 08.02.2002 referring to the para 64 of Judgement of Hon'ble Supreme Court Order dated 29.11.19, the excerpt of which is as below,</p> <p>64. Any Government Order or Incentive Scheme does not govern the Grid Support Charges. Grid Code is the basis for levy of the Grid Support Charges, which came to be approved by the Commission on 26.5.2001. The same is also reflected in the impugned order. The Grid Support Charges can be levied, and the order dated 8.2.2002 of the Commission is, thus on the parity of the reasonings, has to be upheld considering the provisions of Section 21 (3) of the Reforms Act, 1998. Under section II read with section 26 of the Reforms Act, 1998, all fixed charges under the distribution and Grid Support Charges are leviable only at the instance of a distribution company, and because of the discussion above, the Commission has the powers to determine it. In the agreements also there is a power where the Board could have fixed the Grid Support Charge unilaterally, but because of Reforms Act, 1998 came to be enacted, the application was filed in the Commission. After that, the Commission has passed the order in accordance with the law. We</p>	<p>Supreme Court order dt. 29.11.2019, has empowered the State Regulatory Commissions, to levy the Grid Support charges. The same is also supported by various APTEL judgments (dt. 29.09.2015-Renuka Sugars v/s. GERC, PGVCL, Gujarat TRANSCO; dt. 18.02.2012-Chhattisgarh State Power Distribution v/s. Godawari Power &amp; Ispat Ltd) and SERC orders.</p> <p>Research paper on "Grid Support charges on Captive power plant", by K. Balaraman, Ananthapadmanabha, R. Nagraja, K. Parthasarthy; presented at IIT Madras – National Power System Conference 2004 also supports Technically the application of Grid Support Charges on Captive Power Plants.</p> <p>The above mentioned Supreme Court order was issued after the enactment of Electricity Act 2003. TS Discoms are not in a position to dispute the findings of the Supreme Court. Objectors are requested to take up the issue separately.</p>

	<p>find no fault in the same. Thus, the order of the Commission concerning the Grid Support Charges has to be upheld...</p> <p>The Hon'ble Supreme Court upheld the Order of APERC but the facts remain that there was nothing mentioned in the Grid Code on grid support charges and/or under the provisions of the Reforms Act, 1998. But unfortunately, there was no mention about the provisions of the Electricity Act 2003 (The Act). In fact, there is no provision in the Act for determination of Grid Support Charges. The provisions of the Reforms Act 1998 are applicable only till implementation of Electricity Act 2003.</p>	<p>The levy of grid support charges is also a part of recovery of fixed charges incurred by the Distribution licensee for providing benefits of the parallel operation with Grid to the CPPs.</p>
2	<p>We, Nava Bharat Ventures Limited, own and operate 1 14 MW Captive Power Station comprising one 50 MW Unit and two 32 MW Units at Paloncha, in Kothagudem-Bhadradi District wish to submit our objections and concerns on the proposed levy of Grid Support Charges by TS DISCOMS as under.</p>	<p>No comments</p>
3	<p>While proposing the above GSC, the DISCOMs have considered the following advantages to CPPs relying on The Hon'ble Chhattisgarh State Electricity Regulatory Commission's (CSERC) discussion paper on parallel operation charges dated 01.06.2008 and Order dated 31.12.2008, the excerpt of which is as follows:</p> <p>"10.1 Advantages to CPPs:</p> <p>(1) The fluctuations in the load are absorbed by the utility grid in the parallel operation mode. This will reduce the stresses on the captive generator and equipment's. The bulk consumer can operate his generating units at constant power generation mode irrespective of his load cycle.</p> <p>(2) Fluctuating loads of the industries connected in parallel with the grid inject harmonics into the grid. The current harmonics absorbed by the utility grid is much more than that by CPP generator. These harmonics flowing in the grid system are harmful to the equipment's and are also responsible for polluting the power quality of the system.</p>	<p>No comments</p>

	<p>(3) Negative phase sequence current is generated by unbalance loads. The magnitude of negative phase sequence current is much higher at the point of common coupling than at generator output terminal. This unbalance current normally creates problem of overheating of the generators and other equipments of CPP, if not running in parallel with grid. When they are connected to the grid, the TSNPDCL Tariff &amp; Cross Subsidy Surcharge Proposals for FY2022-23 negative phase sequence current flows into the grid and reduces stress on the captive generator.</p> <p>(4) Captive power plants have higher fault level support when they are running in parallel with the grid supply. Because of the higher fault level, the voltage drop at load terminal is less when connected with the grid.</p> <p>(5) On account of increase in plant load factor of captive generator, additional revenues can be generated by the CPPs by sale of surplus power to the utility.</p> <p>(6) In addition to the above, CPPs enjoy the following advantages also: (i) In case of fault in a CPP generating unit or other equipment, bulk consumers can draw the required power from the grid and can save their production loss. (ii) The grid provides stability to the plant to start heavy loads like HT motors. (iii) The variation in the voltage and frequency at the time of starting large motors and heavy loads, is minimized in the industry, as the grid supply acts as an infinite bus. The active and reactive power demand due to sudden and fluctuating load is not recorded in the meter. (iv) The impact created by sudden load throw off and consequent tripping of CPP generator on over speeding is avoided with the grid taking care of the impact. (v) The transient surges reduce the life of equipment of the CPP. In some cases, the equipment fails if transient is beyond a limit. If the system is connected to the grid, it absorbs the transient load. Hence, grid enhances the life of CPP equipments.</p>	No comments
4	In the above matter, The Power Distribution Companies in Telangana and The Hon'ble Telangana Electricity Regulatory Commission have invited the stakeholders to file their comments/suggestions/objection, if any, on or before 5.0 pm on 28.01.2022.	No comments

5	<p><b>HISTORY OF GRID SUPPORT CHARGES (GSC):</b></p> <p>1.The Grid Support Charge (GSC) was initially levied by the erstwhile Hon 'ble APERC vide Order in O.P.No. 1 of 1999 dated 08.02.2002 in the context of the AP Electricity Reform Act, 1998. The GSC order was implemented vide Tariff Order FY 2002-03 from 01.04.2002. The same was challenged before the Hon'ble High Court for the erstwhile State of A.P which was decided in favour of the generators/Captive Power Producers (CPPs) the levy of grid support charges was set aside. An Appeal was filed by APTransco (Civil Appeal No. 4569 of 2003) in the Hon'ble Supreme Court. The Hon'ble Supreme Court, vide its judgement dated 29.11.2019 affirmed the orders of the erstwhile Commission.</p> <p>2.It is pertinent to note that the prevailing conditions during 2002 and the present are totally different. When the Act is not in existence, there was no concept of Open Access, Transmission and Wheeling. The same were allowed by means of mutually agreed agreements at that time.</p> <p>3.It is pertinent to note that the erstwhile APERC was constituted under the AP Electricity Reform Act, 1998, and passed the order in O.P.No.1 of 1999 in exercise of its powers under the said Act.</p>	<p>The grid support charges are approved in Tariff Orders up to FY 2008-09 issued by the erstwhile Hon'ble APERC. The same grid support charges methodology which was in Tariff Orders up to FY 2008-09 is adopted and proposed for the FY 2022-23.</p>
6	<p><b>THE IMPACT OF THE ELECTRICITY ACT, 2003:</b></p> <p>1.In 2003, the Electricity Act, 2003 ("Act") came into force. The Act brought in substantial changes to the previous regime, including the establishment of State Commissions, delicensing of Generation, unbundling of transmission and distribution, specification of tariffs and charges, crystallized the scheme of Open Access, brought in procedures and standards to enforce discipline, etc. However, it left the Commissions established by States under earlier State enactments (such as the AP Electricity Reform Act, 1998) untouched and treated them to be Commissions established under the Act, essentially conferring them with powers under both Acts, in as much as the State enactments were not in derogation to the Act.</p>	<p>The grid support charges are being proposed by the Distribution Licensee for consumers who are having parallel operation of Captive Power Plants with grid. The Distribution Licensee's 132kV &amp; above level HT consumers are not paying Transmission charges &amp; SLDC charges to respective entities even though connected to 132kV &amp; above level. These consumers are paying retail supply Tariffs as approved by the Hon'ble State Commission from time to time which is inclusive of all costs (Incl. SLDC &amp; Transmission Charges).</p> <p>The advantages of parallel operation with the grid are benefited by the CPPs in addition to other facilities of other consumers. In view of the additional benefits than the normal other consumers, the CPPs who intended to use and benefit</p>

2.Open Access was introduced under Section 42 of the Act, in pursuance to which APERC Regulation Nos.2 of 2005 and 2 of 2006 were also promulgated by the erstwhile Commission.

3.Under the provisions of the Act, a separate agency by SLDC/RLDC/NLDC were created to take care of the Grid. SLDC/RLDC is responsible for maintaining grid security, Load forecasting, scheduling and dispatching and balancing of generation and demand (load). The ARR of SLDC was already approved in the MYT Tariff 2021-23. The DISCOMs have no role in maintaining Grid security and have to comply with the directions issued by SLDC/RLDC. Hence, in the present scenario, there is no need to propose GSC by DISCOMs and the DISCOMs have no role in seeking GSC from CPPs connected at 132 KV level.

4.TSTRANSCO and DISCOMs are responsible for Transmission and Wheeling business and can levy these charges only while the levy of GSC at 132 KV level is under the purview of SLDC only. Therefore, TSTRANSCO and DISCOMs have nothing to do with GSC. The ARR of Transmission and DISCOMs distribution business is recovered through Transmission charges and wheeling charges as approved in the relevant MYT orders. As the present ARR and Tariff proposal is to recover the retail supply business costs, the DISCOM has no role in proposing any GSC at voltage level 132 KV.

5.It is also pertinent to note that this Hon 'ble Commission is constituted under the Act, and thus the earlier AP Electricity Reform Act, 1998 under which GSC were earlier determined is neither applicable nor relevant in the present day. The Act, 2003 specifically lays down the charges and tariffs to be collected, and no charges beyond what is prescribed can be levied. Admittedly, there is no charge such as GSC mentioned in the Act or the regulations, let alone under S.62 under which the present petitions are filed, and as such, any such proposal to levy GSC is without jurisdiction.

6.It is thus submitted that the scope of present ARR for Retail Supply Business for FY 2022-23 should be strictly confined in terms of Section 62 of the Act r/w Regulation 4 of 2005 as adopted under Regulation 1 of 2014, and Section 42 of the

from parallel operation need to compensate through Grid Support charges.

The said Grid Support charges are also part of Retail Supply Tariffs and these charges are proposed to levy on the CPPs who intended to use and benefit from parallel operation. Hence the proposal of Grid Support charges for FY 2022-23 are well within the provisions of Act.

However, the full Bench of Tribunal in Appeal No. 120 of 2009 relating to Parallel Operation Charges (Grid Support Charges) in Chhattisgarh by Order dated 18.02.2011 stated that the State Commission is empowered to deal with the question as to whether the levy of parallel operation charges is permissible or not. This aspect has been dealt with by this Tribunal in judgment dated 12.9.2006 in Appeal No.99 of 2006. In the said judgment, this Tribunal upheld the levy of parallel operation charges by the State Commission. Further, the Apex Court of India by its judgment dated 29.11.2019 in Civil Appeal No 8969 of 2003 (Grid Support Charges Batch matters) held that the State Electricity Regulatory Commission is vested with the power to determine the grid support charges.



	<p>Act for the purpose of determination of CSS and any proposal of the DISCOMs to levy GSC is itself misconceived and patently without jurisdiction.</p> <p>Without Prejudice to above submissions of the very authority and iurisdiction to levy GSC. the following further submissions are made.</p>	
7	<p>Captive Power Generation is delicensed under the Electricity Act so as to lessen the burden on the Grid in meeting the distributed loads. The provision in Para 5.2.26 of National Electricity Policy 2005 notified by Govt of India laid emphasis on grid connectivity of captive generators even under open access regime which is reproduced below:"</p> <p>"Under the Act, captive generators have access to licensees and would get access to consumers who are allowed open access. Grid inter-connection for captive generators shall be facilitated as per Section 30 of the Act. This should be done on priority basis to enable captive generation to become available as distributed generation along with the grid.</p> <p>In the spirit of this legislation and rules framed thereunder, determination of Grid Support or Parallel Operation Charge should follow the principles of transparency, actual forbearance and fair computation based on time tested methodology. The proposed levy does not meet any of these criteria and is arbitrary.</p>	<p>The licensee has not denied CPPs access to grid or availing of parallel operation benefits, the captive generators who intended to use and benefit from parallel operation need to compensate through Grid Support charges.</p>
8	<p>In the case of CPPs availing Open Access for transmission and wheeling of power from the generation point to the consumption point, Grid levies charges as determined by the regulator from to time. Even in these cases there is an established mechanism of UI charges which essentially address the so-called grid support or parallel operation. The proposed levy by the TSDISCOMs is therefore quite arbitrary, excessive and is not supported by quantifiable data.</p>	<p>TS Discoms wants to state that the UI charges are levied to the tune up to ~12% of the deviation charges in the case where a Generator or a Discoms deviates from their said drawl or injection schedule.</p> <p>However, if the same generator or to be particular a captive power plant deviates from its said injection schedule say upto a quantum of more than 12% then this level of deviation is absorbed by the Grid. In this case Grid acts as a stabilizer. Thus UI charges amount for only a fraction of the quantum of deviation, whereas Grid support charges help to further develop the grid to absorb the rest of deviations.</p>

<p>9</p>	<p>The Transmission system of the Transco/Discom should be so designed that it should take care of fluctuating load of the consumer as it is the duty of the transmission licensee under Section 40 of Electricity Act, 2003. More over variation of load of a consumer having CPP is much less than a consumer without CPP.</p> <ol style="list-style-type: none"> <li>1. CPPs absorb some amount of harmonics whereas a consumer without CPP inject full quantum of harmonics generated to the grid.</li> <li>2. The unbalanced voltage of the grid is a source of negative phase sequence current which is absorbed by the generators of CPP.</li> <li>3. Fault level depends upon the generation capacity connected to the grid. The parallel operation of CPPs with the grid is in fact beneficial with some degree of voltage support that the CPPs extend to the Grid</li> <li>4. As per Regulations of Supply Code, Industries having CPPs can draw emergency power up to the capacity of largest generating unit by paying required tariff. CPP's drawl of power is limited to "start-up power" that too when there is total loss of generation of the CPP. The drawl of power for production purposes, is limited to the CMD as per the Power Supply Agreement with the DISCOM. Otherwise, penalty is attracted. Overdrawl is prevented by proper setting of the relays at the Grid Sub-station.</li> <li>5. It is wrong to state that active and reactive power demand due to sudden and fluctuating load are not recorded in the meter. Billing is done for all consumers by integration over 15 minutes period and this is also applicable for CPPs and so it does not result in any undue advantage.</li> <li>6. Due to injection of power by CPPs the load on the transformers in the grid reduces resulting in less transformer loss."</li> <li>7. The CPP are acting as distributed generator at the load center for which the transmission and distribution loss has been reduced to great extent.</li> <li>8. As per Section 7 of the Electricity Act, 2003 any generating company may establish operate and maintain a generating station if it complies with State Grid Code and standards of grid connectivity as referred in Section 73 (b) of the Act. Both Tariff Policy and National Electricity Policy emphasizes the need for unhindered connectivity of CPPs to the grid. The proposed and arbitrary</li> </ol>	<p>The Captive Power Plants continue to get connected to the licensee network system and operate their plant in synchronism with the grid due to the following reasons.</p> <p>The fluctuations in the load are absorbed by the utility grid in the parallel operation mode. This will reduce the stresses on the captive generator and equipment.</p> <p>Fluctuating loads of the industries connected in parallel with the grid inject harmonics into the grid. The current harmonics absorbed by the utility grid is much more than that by the CPP generator. These harmonics flowing in the grid system are harmful to the equipment and are also responsible for polluting the power quality of the system.</p> <p>Negative phase sequence current is generated by unbalance loads. The magnitude of negative phase sequence current is much higher at the point of common coupling than at the generator output terminal. This unbalanced current normally creates a problem of overheating of the generators and other equipment of CPP, if not running in parallel with the grid. When they are connected to the grid, the negative phase sequence current flows into the grid and reduces stress on the captive generator.</p> <p>Captive power plants have higher fault level support when they are running in parallel with the grid supply. Because of the higher fault level, the voltage drop at the load terminal is less when connected with the grid.</p> <p>In case of faults in a CPP generating unit or other equipment, bulk consumers can draw the required power from the grid and can save their production loss.</p> <p>The grid provides stability to the plant to start heavy loads like HT motors.</p> <p>The variation in the voltage and frequency at the time of starting large motors and heavy loads, is minimized in the industry, as the grid supply acts as an infinite bus. The active</p>
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<p>quantum of Grid Support Charge makes the captive power generation unviable and the spirit of the act and the rules framed thereunder are thus vitiated.</p> <p>9. There is no provision in the statute that empowers the DISCOMS to levy Grid Support Charges on the CPPs. They, on the other hand are benefited as CPPs absorbed some amount of harmonics. On the contrary consumer without CPPs transmit full quantum of harmonics to the grid. The DISCOMs/TRANSCO is not taking any step to install suitable equipment to filter the harmonics and injecting those pollutants to the grid for which the CPPs are forced to suffer. The grid voltage is always unbalanced due to various categories of consumers and hence is a source of negative phase sequence current which cause stress on the generators of CPPs.</p> <p>10. It is relevant to mention the observation and comments of The Hon 'ble Orissa Electricity Regulatory Commission in a similar matter, in its Order dated 31.03.2014 in Case No. 46/2012, the excerpt of which is as follows:</p> <p>Para- 15 of Order:</p> <p>i. 'We heard the parties at length and also perused the technical report submitted by OPTCL. The present installed capacity of the CGPs in the State as submitted by OPTCL is 5173 MW which is more than or equal to capacity of other generators connected to Odisha Grid including Odisha share of power from Central Generation Stations. We agree with the contention of CCPPO that the pollutants of the Grid like fluctuations in frequency and voltage, negative phase sequence, distortion due to harmonics etc. are the resultant effect of all synchronous machines like generators and motors of the Grid system. These pollutants are injected in to the grid not only by CGPs but also by other independent generators and machines like motors and arc furnaces of the consumers. Holding industry having CGPs only responsible for this is not correct”.</p> <p>Para-16 of Order: "After going through the submission of various stake holders of the grid</p>	<p>and reactive power demand due to sudden and fluctuating load is not recorded in the meter.</p> <p>The impact created by sudden load throw off and consequent tripping of CPP generators on over speeding is avoided with the grid taking care of the impact. Thus the grid acts as the supporting system for the CPPs for its successful operation in terms of electrical performances. However, the grid support being an ancillary service extended by the licensee to the consumers, it has to be charged to the consumers who utilize the grid support.</p> <p>The full Bench of Tribunal in Appeal No. 120 of 2009 relating to Parallel Operation Charges (Grid Support Charges ) in Chhattisgarh by Order dated 18.02.2011 stated that the State Commission is empowered to deal with the question as to whether the levy of parallel operation charges is permissible or not. This aspect has been dealt with by this Tribunal in judgment dated 12.9.2006 in Appeal No.99 of 2006. In the said judgment, this Tribunal upheld the levy of parallel operation charges by the State Commission. Further, the Apex Court of India by its judgment dated 29.11.2019 in Civil Appeal No 8969 of 2003 (Grid Support Charges Batch matters) held that the State Electricity Regulatory Commission is vested with the power to determine the grid support charges. Hence, the levy of grid support charges is well within the provisions.</p> <p>The grid support charges are not for drawl of power from the Distribution Licensee, but for utilization of parallel operation benefits by captive generators.</p>
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system we conclude that the behaviour of industries having CGPs and also without CGPs varies case to case basis. There are ample provisions in the Odisha Grid Code to regulate the behaviour of entities connected to the OPTCL system. Hence, a generic method of calculation of Grid Support Charges for all industries may not be proper. The Petitioner has failed to submit a State-wide study before us on which a decision could have been taken. One solution fits all can 't be applicable here. So implementation of a model of another State in our State will not be proper.

Para- 17 of Order:

"There are enough provisions in Odisha Grid Code, 2006 to maintain quality supply in the grid system. Regulation 4.7 of Odisha Grid Code discuss elaborately the ideal behaviour of constituents of the Grid. OPTCL should play the role of watchdog and analyze the pollutant injected by various constituents of the grid system. CGPs and industries injecting pollution should be directed to take up remedial measures like installation of capacitors, filters for harmonics, etc. so that grid pollution will be minimized. The non-compliance by any industry or industry having CGP of the Grid Code should be dealt as per Regulation 1.18 of OGC, 2006. Therefore, the prayer of OPTCL for levy of Grid Support Charges is not acceptable."

11. Further, when GSC was proposed by APERC during the year 1999 and 2002, the Electricity Act was not in force. The Act is in force from 2003 and Section 9 of Electricity Act does not differentiate between CPP and IPP as far as grid connectivity is concerned and hence both should be treated equitably from the viewpoint of grid connectivity and support.
12. The proposed levy of GSC aims to stifle the consuming industries by this arbitrary levy, which in turn erodes the viability of the principal industry to a point that it must perforce cease operations.
13. CPPs have repeatedly expressed their willingness to provide additional protections in their facilities as desired by the grid to see that no untoward load throwbacks or fault currents or reactive power surges happen.

The licensee has not denied CPPs access to the network; the captive generators who intended to use and benefit from parallel operation need to compensate through Grid Support charges.

The advantages of parallel operation with the grid are benefited by the CPPs in addition to other facilities of other consumers. In view of the additional benefits than the normal other consumers, the CPPs who intended to use and benefit from parallel operation need to compensate through Grid Support charges. The said Grid Support charges are also one of the components in Retail Supply Tariffs and these charges are proposed to levy on the CPPs who intended to use and benefit from parallel operation. Hence the proposal of Grid Support charges for FY 2022-23 are well within the provisions of Act.

Further, the Apex Court of India by its judgment dated 29.11.2019 in Civil Appeal No 8969 of 2003 (Grid Support Charges Batch matters) held that the State Electricity Regulatory Commission is vested with the power to determine the grid support charges.

14. The levy of GSC in 1999 was proposed when the generation shortfall was prevailing, and the TSDISCOMS were going through occasional R&C periods and frequency fluctuations, etc. when the Regulator considered that the proposed levy had merits. However, the TS Grid has since improved / made many strides in Grid size, availability of power and attained stability and is one of the few Grids in the country being engaged in export of power on a steady basis. Aggregate capacity of the CPPs now is relatively marginal compared to the Grid Size and no real forbearance could be possible warranting such huge and arbitrary levy.
15. Grid Support Charges can not be a substitute for Demand or Capacity Charges which are determined on a wider basis by the regulator. So the proposed levy of Grid Support Charges based on applicable demand charge is arbitrary, excessive and results in undue enrichment of the TSDISCOMs at the expense of CPPs
16. For the various reasons cited above, the Grid situation requires to be thoroughly reviewed with reference to the fact whether the Grid suffers any forbearance in providing parallel operations of CPPs. We request the Hon'ble Commission to procure from the Licensees that such a review be conducted on an arms-length basis by an independent third party, taking into account the actual power harmonics, fault currents or load throwbacks as claimed by TSDISCOMS and also to arrive at a justifiable and reasonable charge based on actual cost / damage suffered by the Grid, if any, in providing such parallel operations to CPPs
17. The prevailing parallel operation charge which is equivalent to the proposed GSC in other States is as follows:

Name of the State	Grid Support Charges Rs/KVA/Month
Madhya Pradesh	Rs.20/KVA/Month
Rajasthan	Rs.20/KVA/Month
Gujarat	Rs.26/KVA/Month
Tamilnadu	Rs.30/KVA/Month

The Hon'ble Supreme court in its order on Determination of Grid support charges dated 29.11.2019 upheld the Hon'ble APERC's order quoted above concerning Grid support charges. The licensee has proposed the same grid support charges methodology approved in APERC order dated 08.02.2002 which is upheld by the Hon'ble Supreme court of India.

The proposed grid support charges shall be levied on differential capacity only i.e., difference between CPP capacity and CMD with Distribution Licensee. Whereas in other states, these grid support charges are calculated in entire capacity of Captive Power Plant (CPP). Moreover, if the CMD with licensee is more than or equal to capacity of CPP, there will not be levied any grid support charges to such consumer.

Grid Support charges computation example:

Captive Capacity = 100 MVA = 100,000 kVA .....[a]

CMD with Distribution licensee = 90 MVA = 90,000 kVA.....[b]

Differential capacity = [a-b] = 10 MVA = 10,000 kVA ....[c]

GSC (Rs. Cr.) = c \* 50% of Demand charges

= 10000 \* (50% of say Rs. 475) / 10<sup>7</sup>

= Rs. 0.2375 Cr./ month

Comparison of GSC with other states like Madhya Pradesh, Gujarat, Tamil Nadu, Chhattisgarh

Consider GSC @ Rs. 25 / kVA / month

Captive Capacity = 100 MVA = 100,000 KVA

GSC (Rs. Cr.) = 25 \* 100000 / 10<sup>7</sup>

= Rs. 0.25 Cr. / month

Thus GSC determined by TS Discoms is very much justifiable.

J&K	Rs.16/- per kVA per month on the installed capacity of the CPP
Karnataka	Nil
Kerala	Nil
Odisha	Nil
West Bengal	Nil

The above utilities have proposed these rates after third party analysis.

From the above table it can be seen that the parallel operation charge or GSC in other States has either not been levied or has been worked out based on clear parameters of the costs incurred by the Grid and so are considered 475per KVA per month, proposed by TSDiscoms. The proposed levy has no basis and is grossly excessive, arbitrary, and so requires to be rejected or reduced substantially as validated by an independent third-party analysis.

18. It may please be noted that, before determination of GSC/POC, The Hon'ble Chhattisgarh State Electricity Regulatory Commission (CSERC) has assigned this responsibility to an independent third party M/s.Electrical Research & Development Association (ERDA) to study various system data and system parameters of representative selected CPPs. Accordingly, ERDA has measured various system parameters like harmonics, unbalance current, plant load factor, load cycle, fault level calculations etc by measurement on selected CPPs and relevant substation and finally ERDA has suggested working out the parallel operation charges on sound technical basis taking into consideration advantages and disadvantages to both CPPs & CSEB and submitted its recommendation to CSERC. Accordingly, CSERC determined Grid support charges Rs.21/KVA/Month. Similarly, The Hon 'ble OERC has also appointed an independent third party for system study before determination of GSC.

19. We request the Hon'ble Commission to engage a similar independent reputed third party to conduct a thorough analysis of system study and technical issues concerning power load throwbacks by CPPS/consuming

However, if the Captive Plant's Capacity is less than or equal to contracted maximum demand with licensee, such captive power plant will not attract grid support charges.

Supreme Court order dt. 29.11.2019, has empowered the State Regulatory Commissions, to levy the Grid Support charges. The same is also supported by various APTEL judgments (dt. 29.09.2015-Renuka Sugars v/s. GERC, PGVCL, Gujarat TRANSCO; dt. 18.02.2012-Chhattisgarh State Power Distribution v/s. Godawari Power &Ispat Ltd) and SERC orders.

Research paper on "Grid Support charges on Captive power plant", by K. Balaraman, Ananthapadmanabha, R. Nagraja, K. Parthasarthy; presented at IIT Madras – National Power System Conference 2004 also supports Technically the application of Grid Support Charges on Captive Power Plants.

<p>industries, power harmonics in parallel operation of CPPs, size of the CPPs and judiciously arrive at a reasonable charge as has been followed by other state utilities to arrive of the grid support charges/parallel operation charges. TS DISCOMS also should pursue this best practice to obtain an arm's length analysis and fair rates for all constituents.</p> <p>20. The proposed levy of GSC at such a high rate will be a death knell for large process industries which depend upon captive power at reasonable cost. The proposed GSC will hit at the core viability of the principal industry resulting in closure of operations and in loss of direct and indirect employment aside from loss of revenue to the exchequer.</p> <p>21. There is no mention of basis and methodology by DISCOMS for the proposed GSC of 50% of demand charges. If we consider the proposed GSC, a captive power generating plant having installed capacity of 100 MW, is needs to pay GSC of Rs.2.97 Crores per month and Rs.35.63 Crores per annum, forcing closure of the industry in Telangana.</p> <p>22. In our case, the CPPs installed capacities are much higher when compared to our captive load to ensure higher availability for captive use. Since our installed and operating capacity of captive load is much lower than installed Capacity of Captive Power plant, it is required to connected with grid for export of surplus power through open access.</p> <p>23. Since it needs to import startup power during the occasions of blackout, the grid connection is required.</p> <p>24. The Grid connection is requited to import renewable energy .</p>	<p>The grid support charges were approved in Tariff Orders up to FY 2008-09 issued by the erstwhile Hon'ble APERC.</p> <p>The proposed grid support charges are very negligible per unit in respect of generation of captive power plants. However, if the Captive Plant Capacity is less than or equal to contracted maximum demand with licensee, such captive power plant capacity will not attract grid support charges.</p> <p>The grid support charges methodology which was approved in Tariff Orders up to FY 2008-09 is adopted and proposed for the FY 2022-23.</p> <p>As per the proposed Grid Support Charges, in case of CPPs exporting firm power to TSTRANSCO, the capacity, which is dedicated to such export, will also be additionally subtracted from the CPP capacity while calculating grid support charges.</p>
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**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by Sri A.K.AGRAWAL, GM(Electrical), Orient Cement Ltd, Devapur Plant:PO Devapur Cement Works,District:Adilabad-504218**

S. No	Summary of Objections / Suggestions	Response of the Licensee
1	<p>While filing the Tariff Proposals (ARR) for FY 2022-23, The Distribution Licensees in Telangana have proposed, inter alia, a levy of Grid Support Charges on Captive Power Plants (CPPs) in Telangana for parallel operation with Grid as mentioned below.</p> <p>“Persons operating Captive Power Plants (CPPs) in parallel with T.S. Grid have to pay ‘Grid Support Charges’ for FY 2022-23 on the difference between the capacity of CPP in kVA and the contracted Maximum Demand in kVA with Licensee and all other sources of supply, at a rate equal to 50% of the prevailing demand charge for HT Consumers. In case of CPPs exporting firm power to TSTRANSCO, the ix capacity, which is dedicated to such export, will also be additionally subtracted from the CPP capacity.”</p> <p>In the ARR, The DISCOMS preferred to consider the above term considering the erstwhile APERC’s Order dated 08.02.2002 and referring the para 64 of Judgement of Hon’ble Supreme Court Order dated 29.11.19, the excerpt of which is as below,</p> <p>64. Any Government Order or Incentive Scheme does not govern the Grid Support Charges. Grid Code is the basis for levy of the Grid Support Charges, which came to be approved by the Commission on 26.5.2001. The same is also reflected in the impugned order. ....The Grid Support Charges can be levied, and the order dated 8.2.2002 of the Commission is, thus on the parity of the reasoning’s, has to be upheld considering the provisions of Section 21 (3) of the Reforms Act, 1998. Under section 11 read with section 26 of the Reforms Act,</p>	<p>Supreme Court order dt. 29.11.2019, has empowered the State Regulatory Commissions, to levy the Grid Support charges. The same is also supported by various APTEL judgments (dt. 29.09.2015-Renuka Sugars v/s. GERC, PGVCL, Gujarat TRANSCO; dt. 18.02.2012-Chhattisgarh State Power Distribution v/s. Godawari Power &amp;Ispat Ltd) and SERC orders.</p> <p>Research paper on “Grid Support charges on Captive power plant”, by K. Balaraman, Ananthapadmanabha, R. Nagraja, K. Parthasarthy; presented at IIT Madras – National Power System Conference 2004 also supports Technically the application of Grid Support Charges on Captive Power Plants.</p> <p>The levy of grid support charges is also a part of recovery of fixed charges incurred by the Distribution licensee for providing benefits of the parallel operation with Grid to the CPPs.</p>



	<p>1998, all fixed charges under the distribution and Grid Support Charges are leviable only at the instance of a distribution company, and because of the discussion above, the Commission has the powers to determine it. In the agreements also there is a power where the Board could have fixed the Grid Support Charge unilaterally, but because of Reforms Act, 1998 came to be enacted, the application was filed in the Commission. After that, the Commission has passed the order in accordance with the law. We find no fault in the same. Thus, the order of the Commission concerning the Grid Support Charges has to be upheld...”</p> <p>The Hon’ble Supreme Court has upheld the Order of APERC considering the provisions of the Reforms Act, 1998. But unfortunately, there was no mention about the provisions of the Electricity Act 2003. In fact there is no provision in EA 2003 for determination of Grid Support Charges</p>	
2	<p>We, orient Cement Ltd. Limited, own and operate a Captive Power Plant comprising Two Nos 25 MW at Devapur, Dist: Mancherial wish to submit our objections and concerns on the proposed levy of Grid Support Charges by TS DISCOMS as under.</p>	No comments
3	<p>While proposing the above, the DISCOMs have considered the following advantages to CPPs relying on The Hon’ble Chhattisgarh State Electricity Regulatory Commission’s (CSERC) discussion paper on parallel operation charges dated 01.06.2008 and Order dated 31.12.2008, the excerpt of which is as follows:</p> <p>“10.1 Advantages to CPPs:</p> <p>(1) The fluctuations in the load are absorbed by the utility grid in the parallel operation mode. This will reduce the stresses on the captive generator and equipment’s. The bulk consumer can operate his</p>	No comments

generating units at constant power generation mode irrespective of his load cycle.

(2) Fluctuating loads of the industries connected in parallel with the grid inject harmonics into the grid. The current harmonics absorbed by the utility grid is much more than that by CPP generator. These harmonics flowing in the grid system are harmful to the equipments and are also responsible for polluting the power quality of the system.

(3) Negative phase sequence current is generated by unbalance loads. The magnitude of negative phase sequence current is much higher at the point of common coupling than at generator output terminal. This unbalance current normally creates problem of overheating of the generators and other equipment's of CPP, if not running in parallel with grid. When they are connected to the grid, the TSNPDCL Tariff & Cross Subsidy Surcharge Proposals for FY2022-23 33 negative phase sequence current flows into the grid and reduces stress on the captive generator.

(4) Captive power plants have higher fault level support when they are running in parallel with the grid supply. Because of the higher fault level, the voltage drop at load terminal is less when connected with the grid.

(5) On account of increase in plant load factor of captive generator, additional revenues can be generated by the CPPs by sale of surplus power to the utility.

(6) In addition to the above, CPPs enjoy the following advantages also: (i) In case of fault in a CPP generating unit or other equipment, bulk consumers can draw the required power from the grid and can save their production loss. (ii) The grid provides stability to the plant to start heavy loads like HT motors. (iii) The variation in the voltage

	<p>and frequency at the time of starting large motors and heavy loads, is minimized in the industry, as the grid supply acts as an infinite bus. The active and reactive power demand due to sudden and fluctuating load is not recorded in the meter. (iv) The impact created by sudden load throw off and consequent tripping of CPP generator on over speeding is avoided with the grid taking care of the impact. (v) The transient surges reduce the life of equipment of the CPP. In some cases, the equipment fails if transient is beyond a limit. If the system is connected to the grid, it absorbs the transient load. Hence, grid enhances the life of CPP equipment.</p>	
4	<p>In the above matter, The Power Distribution Companies in Telangana and The Hon'ble Telangana Electricity Regulatory Commission have invited the stakeholders to file their comments/suggestions/objection, if any, on or before 5.0 pm on 28.01.2022.</p>	No comments
5	<p>Our objections against the proposed Grid Support Charges are set out below for your kind consideration and disposal:</p>	<p>The benefits extended by the licensee to the CPP consumers, it has to be charged to the consumers who utilize the grid support. Hence, the licensee has proposed the levy of grid support charges duly adopting the methodology approved in the APERC order 08.02.2002 and subsequently upheld by Supreme Court via judgment dated 29.11.2019.</p>
6	<p>History of Grid Support Charges (GSC):</p> <p>The Grid Support Charge (GSC) was initially levied by the erstwhile Hon'ble APERC vide Order in O.P.No. 1 of 1999 dated 08.02.2002 in the context of the AP Electricity Reform Act, 1998. The GSC order was implemented vide Tariff Order FY 2002-03 from 01.04.2002. The same was challenged before the Hon'ble High Court for the erstwhile State of A.P which was decided in favour of the generators/Captive Power Producers (CPPs) by setting aside the levy of grid support charges. An Appeal was filed by APTransco (Civil Appeal No. 4569 of</p>	

	<p>2003) in the Hon'ble Supreme Court. The Hon'ble Supreme Court, vide its judgement dated 29.11.2019 affirmed the orders of the erstwhile Commission.</p> <p>The prevailing conditions during 2002 and the present are totally different. Then the Electricity Act, 2003 had not come into existence and SLDC had no separate statutory identity then and SLDC revenue was part of APTRANSCO.</p> <p>There was lot of indiscipline in Transmission Companies. States were exceeding the drawl limits as there was no stringent enforcement mechanism. The result is that, we have witnessed failure of Northern grid in Jan 2, 2001 and 230 million people were affected.</p> <p>There was no concept of Open Access, and Transmission and Wheeling were allowed by means of mutually agreed agreements as per the prevailing statutes viz. The Indian Electricity Act, 1910, The Electricity (Supply) Act, 1948 and rules made thereunder.</p> <p>It is pertinent to note that the erstwhile APERC was constituted under the AP Electricity Reform Act, 1998, and has passed the order in O.P.No.1 of 1999 in exercise of its powers under the said Act.</p>	<p>Supreme Court order dt. 29.11.2019, has empowered the State Regulatory Commissions, to levy the Grid Support charges. The same is also supported by various APTEL judgments (dt. 29.09.2015-Renuka Sugars v/s. GERC, PGVCL, Gujarat TRANSCO; dt. 18.02.2012-Chhattisgarh State Power Distribution v/s. Godawari Power &amp; Ispat Ltd) and SERC orders.</p> <p>Research paper on "Grid Support charges on Captive power plant", by K. Balaraman, Ananthapadmanabha, R. Nagraja, K. Parthasarthy; presented at IIT Madras – National Power System Conference 2004 also supports Technically the application of Grid Support Charges on Captive Power Plants.</p> <p>The grid support charges are approved in Tariff Orders up to FY 2008-09 issued by the erstwhile Hon'ble APERC. The same grid support charges methodology which was in Tariff Orders up to FY 2008-09 is adopted and proposed for the FY 2022-23.</p>
7	<p>The Impact of the Electricity Act, 2003:</p> <p>In 2003, the Electricity Act, 2003 ("Act") came into force. The Act brought in substantial changes to the previous regime, including the establishment of State Commissions, delicensing of Generation, unbundling of transmission and distribution, specification of tariffs and charges, crystallized the scheme of Open Access, brought in procedures and standards to enforce discipline, etc. However, it left the Commissions established by States under earlier State enactments (such as the AP Electricity Reform Act, 1998) untouched and treated them to be Commissions established under the Act,</p>	

essentially conferring them with powers under both Acts, in as much as the State enactments were not in derogation to the Act.

Open Access was introduced under Section 42 of the Act, in pursuance to which APERC Regulation Nos.2 of 2005 and 2 of 2006 were also promulgated by the erstwhile Commission. The Grid Code came into existence. In 2021, this Hon'ble Commission also notified Regulation No.3 of 2021 to maintain grid discipline and grid security as envisaged under the State Electricity Grid Code through the commercial mechanism for Deviation Settlement for controlling drawal and injection of electricity by the users of the grid.

CPP's are exempt from the payment of CSS as per the 4th proviso to S.42(2) of the Act, as the legislature intended to reduce the charges on CPP's in order to encourage generation. Further, S.86(1)(e) of the Act also prescribes that generation from cogeneration sources be promoted.

Now, as there is an established mechanism to bring discipline among the Generators and Consumers by levying various charges as per the Grid Code, Open Access (OA) Regulations. Both OA Consumers and OA Generators are supposed to declare Week Ahead and Day Ahead Schedules.

SLDC/RLDC is the nodal agency to maintain Grid discipline and optimum scheduling and despatch of electricity under Sections 28 and 32 of the Act. Every Licensee, Generating companies and other persons connected with the operation of power system are under strict obligation to comply with the directions issued by RLDC (Section 29(1) of the Act) and SLDC (S.33(1) of the Act) as per the Regulations prescribed by the appropriate Commission.

Under the provisions of the Act, a separate agency by SLDC/RLDC/NLDC were created to take care of the Grid. SLDC/RLDC is responsible for maintaining grid security, Load forecasting, scheduling and despatching and balancing of generation and demand (load). The ARR of SLDC was already approved in the MYT Tariff 2021-23. The DISCOMs have no role in maintaining Grid security and have to comply with the directions issued by SLDC/RLDC. Hence, in the present scenario, there is no need to propose GSC by DISCOMs and the DISCOMs have no role in seeking GSC.

TSTRANSCO and DISCOMs are responsible for Transmission and Wheeling business and can levy these charges only while the levy of GSC is under the purview of SLDC only. Therefore, TSTRANSCO and DISCOMs have nothing to do with GSC. The ARR of Transmission and DISCOMs distribution business is recovered through Transmission charges and wheeling charges as approved in the relevant MYT orders. As the present ARR and Tariff proposal is to recover the retail supply business costs, the DISCOM has no role in proposing any GSC.

It is also pertinent to note that this Hon'ble Commission is constituted under the Act, and thus the earlier AP Electricity Reform Act, 1998 under which GSC were earlier determined is neither applicable nor relevant in the present day. The Act, 2003 specifically lays down the charges and tariffs to be collected, and no charges beyond what is prescribed can be levied. Admittedly, there is no charge such as GSC mentioned in the Act or the regulations, let alone under S.62 under which the present petitions are filed, and as such, any such proposal to levy GSC is without jurisdiction.

It is thus submitted that the scope of present ARR for Retail Supply Business for FY 2022-23 should be strictly confined in terms of Section 62 of the Act r/w Regulation 4 of 2005 as adopted under Regulation

The grid support charges are being proposed by the Distribution Licensee for consumers who are having parallel operation of Captive Power Plants. The Distribution Licensee's 132kV & above level HT consumers are not paying Transmission charges & SLDC charges to respective entities even though connected to 132kV & above level. These consumers are paying retail supply Tariffs as approved by the Hon'ble State Commission from time to time which is inclusive of all costs (Incl SLDC & Transmission Charges).

The advantages of parallel operation with the grid are benefited by the CPPs in addition to other facilities of other consumers. In view of the additional benefits than the normal other consumers, the CPPs who intended to use and benefit from parallel operation need to compensate through Grid Support charges.

The said Grid Support charges are also part of Retail Supply Tariffs and these charges are proposed to levy on the CPPs who intended to use and benefit from parallel operation. Hence the proposal of Grid Support charges for FY 2022-23 are well within the provisions of Act.

However, the full Bench of Tribunal in Appeal No. 120 of 2009 relating to Parallel Operation Charges(Grid Support Charges) in Chhattisgarh by Order dated 18.02.2011 stated that the State Commission is empowered to deal with the question as to whether the levy of parallel operation charges is permissible or not. This aspect has been dealt with by this Tribunal in judgment dated 12.9.2006 in Appeal No.99 of 2006. In the said judgment, this Tribunal upheld the levy of parallel operation charges by the State Commission. Further, the Apex Court of India by its judgment dated

	1 of 2014, and Section 42 of the Act for the purpose of determination of CSS and any proposal of the DISCOMs to levy GSC is itself misconceived and patently without jurisdiction.	29.11.2019 in Civil Appeal No 8969 of 2003 (Grid Support Charges Batch matters) held that the State Electricity Regulatory Commission is vested with the power to determine the grid support charges.
	<p>Without Prejudice to above submissions of the very power and jurisdiction to levy GSC, the following further submissions are made.5.3 Captive Power Generation is delicensed under the Electricity Act so as to lessen the burden on the Grid in meeting the distributed loads. The provision in Para 5.2.26 of National Electricity Policy 2005 notified by Govt of India laid emphasis on grid connectivity of captive generators even under open access regime which is reproduced below:"</p> <p>“Under the Act, captive generators have access to licensees and would get access to consumers who are allowed open access. Grid inter-connection for captive generators shall be facilitated as per Section 30 of the Act. This should be done on priority basis to enable captive generation to become available as distributed generation along with the grid.”</p> <p>In the spirit of this legislation and rules framed thereunder, determination of Grid Support or Parallel Operation Charge should follow the principles of transparency, actual forbearance and fair computation based on time tested methodology. The proposed levy does not meet any of these criteria and is arbitrary.</p>	The licensee has not denied CPPs access to the network, the captive generators who intended to use and benefit from parallel operation need to compensate through Grid Support charges.
8	In the case of CPPs availing Open Access for transmission and wheeling of power from the generation point to the consumption point, Grid levies charges as determined by the regulator from to time. Even in these cases there is an established mechanism of UI charges which essentially address the so-called grid support or	<p>TS Discoms wants to state that the UI charges are levied to the tune up to ~12% of the deviation charges in the case where a Generator or a Discoms deviates from their said drawl or injection schedule.</p> <p>However, if the same generator or to be particular a captive power plant deviates from its said injection schedule say up to a quantum of more than</p>

	<p>parallel operation, A similar time tested methodology should be devised for such CPPs that do not avail open access so that Grid is adequately</p> <p>Compensated for forbearance, if any, in providing parallel operation to CPPs. The proposed levy by the TSDISCOMs is therefore quite arbitrary, excessive and is not supported by quantifiable data.</p>	<p>12% then this level of deviation is absorbed by the Grid. In this case Grid acts as a stabilizer. Thus UI charges amount for only a fraction of the quantum of deviation, whereas Grid support charges help to further develop the grid to absorb the rest of deviations.</p>
9	<p>The Transmission system of the Transco/Discom should be so designed that it should take care of fluctuating load of the consumer as it is the duty of the transmission licensee under Section 40 of Electricity Act, 2003. More over variation of load of a consumer having CGP is much less than a consumer without CGP.</p> <p>CGPs absorb some amount of harmonics whereas a consumer without CGP inject full quantum of harmonics generated to the grid.</p> <p>The unbalanced voltage of the grid is a source of negative phase sequence current which is absorbed by the generators of CGP.</p> <p>Fault level depends upon the generation capacity connected to the grid. The parallel operation of CGPs with the grid is infact beneficial with some degree of voltage support that the CGPs extend to the Grid</p> <p>As per Regulations of Supply Code, Industries having CGPs can draw emergency power up to the capacity of largest generating unit by paying required tariff. CPP's drawl of power is limited to "start-up power" that too when there is total loss of generation of the CPP. The drawl of power for production purposes, is limited to the CMD as per the Power Supply Agreement with the DISCOM. Otherwise, penalty is attracted. Overdrawl is prevented by proper setting of the relays at the Grid Sub-station.</p>	<p>As per the proposed grid charges conditions, the grid support charges will not be levied on the entire capacity of CPP and it will be levied only on differential capacity between CPP capacity and CMD with Distribution Licensee.</p> <p><b>Grid Support charges computation example:</b>  Captive Capacity = 100 MVA = 100,000 kVA .....[a]  CMD with Distribution licensee = 90 MVA = 90,000 kVA.....[b]</p> <p>Differential capacity = [a-b] = 10 MVA = 10,000 kVA ....[c]  GSC (Rs. Cr.) = c * 50% of Demand charges  = 10000 * (50% of say Rs. 475) / 10<sup>7</sup>  = <b>Rs. 0.2375 Cr./ month</b></p> <p><b>Comparison of GSC with other states like Madhya Pradesh, Gujarat, Tamil Nadu, Chhattisgarh</b></p> <p>Consider GSC @ Rs. 25 / kVA / month  Captive Capacity = 100 MVA = 100,000 kVA  GSC (Rs. Cr.) = 25 * 100000 / 10<sup>7</sup>  = <b>Rs. 0.25 Cr. / month</b></p> <p><b>Thus GSC determined by TS Discoms is very much justifiable.</b></p>



It is wrong to state that active and reactive power demand due to sudden and fluctuating load are not recorded in the meter. Billing is done for all consumers by integration over 15 minutes period and this is also applicable for CPPs and so it does not result in any undue advantage.

Due to injection of power by CGPs the load on the transformers in the grid reduces resulting in less transformer loss."

The CGP are acting as distributed generator at the load center for which the transmission and distribution loss has been reduced to great extent.

As per Section 7 of the Electricity Act, 2003 any generating company may establish operate and maintain a generating station if it complies with State Grid Code and standards of grid connectivity as referred in Section

73 (b) of the Act. Both Tariff Policy and National Electricity Policy emphasizes the unhindered connectivity of CGPs to the grid. The proposed and arbitrary quantum of Grid Support Charge makes the captive power generation unviable and the spirit of the act and the rules framed thereunder are thus vitiated.

There is no provision in the statute empowers the DISCOMS to levy Grid Support Charges on the CPPs. They, on the other hand as CPPs absorbed some amount of harmonics. On the contrary consumer without CGPs transmit full quantum of harmonics to the grid. The DISCOMs/TRANSCO is not taking any step to install suitable equipment to filter the harmonics and injecting those pollutants to the grid for which the CPPs are forced to suffer. The grid voltage is always unbalanced due to various categories of consumers and hence is a source of negative phase sequence current which cause stress on

The grid support charges are not for drawl of power from the Distribution Licensee, but for utilization of parallel operation benefits by captive generators.

However, if the Captive Plant Capacity is less than or equal to contracted maximum demand with licensee, such captive power plant capacity will not attract grid support charges.

The licensee has not denied CPPs access to the network; the captive generators who intended to use and benefit from parallel operation need to compensate through Grid Support charges.

The advantages of parallel operation with the grid are benefited by the CPPs in addition to other facilities of other consumers. In view of the additional benefits than the normal other consumers, the CPPs who intended to use and benefit from parallel operation need to compensate through Grid Support charges. The said Grid Support charges are also one of the components in Retail Supply Tariffs and these charges are proposed to levy on the CPPs who intended to use and benefit from parallel operation. Hence the proposal of Grid Support charges for FY 2022-23 are well within the provisions of Act.

the generators of CPPs. Transco being the STU of Telangana should find some means to prevent the same

It is relevant to mention the observation and comments of The Hon'ble Orissa Electricity Regulatory Commission in the similar matter, in its Order dated 31.03.2014 in Case No. 46/2012, the excerpt of which is as follows:

i) Para- 15 of Order:

“We heard the parties at length and also perused the technical report submitted by OPTCL. The present installed capacity of the CGPs in the State as submitted by OPTCL is 5173 MW which is more than or equal to capacity of other generators connected to Odisha Grid including Odisha share of power from Central Generation Stations. We agree with the contention of CCPPO that the pollutants of the Grid like fluctuations in frequency and voltage, negative phase sequence, distortion due to harmonics etc. are the resultant effect of all synchronous machines like generators and motors of the Grid system. These pollutants are injected in to the grid not only by CGPs but also by other independent generators and machines like motors and arc furnaces of the consumers. Holding industry having CGPs only responsible for this is not correct”.

ii) Para-16 of Order:

“After going through the submission of various stake holders of the grid system we conclude that the behaviour of industries having CGPs and also without CGPs varies case to case basis. There are ample provisions in the Odisha Grid Code to regulate the behaviour of entities connected to the OPTCL system. Hence, a generic method of calculation of Grid Support Charges for all industries may not be proper. The Petitioner has failed to submit a

State-wide study before us on which a decision could have been taken. One solution fits all can't be applicable here. So implementation of a model of another State in our State will not be proper."

iii) Para- 17 of Order:

"There are enough provisions in Odisha Grid Code, 2006 to maintain quality supply in the grid system. Regulation 4.7 of Odisha Grid Code discuss elaborately the ideal behaviour of constituents of the Grid. OPTCL should play the role of watchdog and analyze the pollutant injected by various constituents of the grid system. CGPs and industries injecting pollution should be directed to take up remedial measures like installation of capacitors, filters for harmonics, etc. so that grid pollution will be minimized. The non-compliance by any industry or industry having CGP of the Grid Code should be dealt as per Regulation 1.18 of OGC, 2006. Therefore, the prayer of OPTCL for levy of Grid Support Charges is not acceptable."

Just as in the case of Original proposal when GSC was proposed at 50% of the then applicable Demand Charge of Rs 170 per KVA during the year 2002, the current proposal of 50% of the Demand Charge of Rs 475 per KVA per month is also not supported by any data proving that the grid suffered to this extent in providing parallel operations to CPPs.

CPPs involve heavy capital investments and are necessitated to provide fillip to the main consumption industry utilizing captive power at reasonable rate as opposed to fluctuating and ever-increasing grid tariff.

Further, the Original proposal when GSC was proposed by APERC during the year 1999 and 2002, the Electricity Act is not in force. The

The grid support charges were approved in Tariff Orders up to FY 2008-09 issued by the erstwhile Hon'ble APERC.

The advantages of parallel operation with the grid are benefited by the CPPs in addition to other facilities of other consumers. In view of the additional benefits than the normal other consumers, the CPPs who intended to use and benefit from parallel operation need to compensate through Grid Support charges.

Act is in force from 2003 and Section 9 of Electricity Act does not difference between CGP and IPP as far as grid connectivity is concerned and hence both should be treated equitably from the viewpoint of grid connectivity and support.

The proposed levy of GSC aims to stifle the consuming industries by this arbitrary levy, which in turn erodes the viability of the principal industry to a point that it must perforce cease operations.

The CPPs who are predominantly coal-fired, are already subjected to substantial increases in coal cost being supplied by the State mining companies and have no window to absorb such high levies such as the proposed GSC.

CPPs have repeatedly expressed their willingness to provide additional protections in their facilities as desired by the grid to see that no untoward load throwbacks or fault currents or reactive power surges happen.

The original levy of GSC in 1999 was proposed when the generation shortfall was prevailing, and the TSDISCOMS were going through occasional R&C periods and frequency fluctuations, etc. when the Regulator considered that the proposed levy had merits. However, the TS Grid has since improved / made many strides in Grid size, availability of power and attained stability and is one of the few Grids in the country being engaged in export of power on a steady basis. Aggregate capacity of the CPPs now is relatively marginal compared to the Grid Size and no real forbearance could be possible warranting such huge and arbitrary levy.

Grid Support Charges can not be a substitute for Demand or Capacity Charges which are determined on a wider basis by the regulator. So the proposed levy of Grid Support Charges based on applicable

Research paper on "Grid Support charges on Captive power plant", by K. Balaraman, Ananthapadmanabha, R. Nagraja, K. Parthasarthy; presented at IIT Madras – National Power System Conference 2004 also supports Technically the application of Grid Support Charges on Captive Power Plants where in the Grid Support charges can be a certain percentage of fixed charges chargeable by the licensee to the consumers.

demand charge is arbitrary, excessive and results in undue enrichment of the TSDISCOMs at the expense of CPPs

Determination of the Grid Support Charges based on CPP capacity in KVA lacks merits while the entire power systems in the premises of CPP are approved by CEIG in KW, Aside from this even the export contracts either bilateral or under the Exchanges are settled in MWs. So the quantification of the Grid Support Charge, if any, has to be in KW.

The Grid situation therefore requires to be thoroughly reviewed with reference to the fact whether the Grid suffers any forbearance in providing parallel operations of CPPs. We request the Hon'ble Commission to procure from the Licensees that such a review be conducted on an arms-length basis by an independent third party, taking into account the actual power harmonics, fault currents or load throwbacks as claimed by TSDISCOMS and also to arrive at a justifiable and reasonable charge based on actual cost / damage suffered by the Grid, if any, in providing such parallel operations to CPPs.

The prevailing parallel operation charge which is equivalent to the proposed GSC in other States is as follows:

Name of the State	Grid Support Charges Rs/KVA/Month
Madhya Pradesh	Rs.20/KVA/Month
Rajasthan	Rs.20/KVA/Month
Gujarat	Rs.26/KVA/Month
Tamilnadu	Rs.30/KVA/Month
J&K	Rs.16/- per kVA per month on the installed capacity of the CPP

The grid support charges methodology which was approved in Tariff Orders up to FY 2008-09 is adopted and proposed for the FY 2022-23.

Grid Support charges computation example:

Captive Capacity = 100 MVA = 100,000 kVA .....[a]

CMD with Distribution licensee = 90 MVA = 90,000 kVA.....[b]

Differential capacity = [a-b] = 10 MVA = 10,000 kVA ....[c]

GSC (Rs. Cr.) = c \* 50% of Demand charges

= 10000 \* (50% of say Rs. 475) / 10<sup>7</sup>

= Rs. 0.2375 Cr./ month

Comparison of GSC with other states like Madhya Pradesh, Gujarat, Tamil Nadu, Chhattisgarh

Consider GSC @ Rs. 25 / kVA / month

Captive Capacity = 100 MVA = 100,000 kVA

GSC (Rs. Cr.) = 25 \* 100000 / 10<sup>7</sup>

= Rs. 0.25 Cr. / month

Thus GSC determined by TS Discoms is very much justifiable.

Karnataka	Nil
Kerala	Nil
Odisha	Nil
West Bengal	Nil

The above utilities have proposed these rates after third party analysis.

From the above table it can be seen that the parallel operation charge or GSC in other States has been worked out based on clear parameters of the costs incurred by the Grid and so are considered reasonable as against the proposed levy of 50% of the Demand Charge of Rs 475per KVA per month, proposed by TSDiscoms. The proposed levy has no basis and is grossly excessive, arbitrary, and so requires to be reduced substantially and validated by an independent third-party analysis.

It may please be noted that, before determination of GSC, The Hon'ble Chhattisgarh State Electricity Regulatory Commission (CSERC) has assigned this responsibility to an independent third party M/s.Electrical Research & Development Association (ERDA) to study various system data and system parameters of representative selected CPPs. Accordingly ERDA has measured various system parameters like harmonics, unbalance current, plant load factor, load cycle, fault level calculations etc by measurement on selected CPPs and relevant substation and finally ERDA has suggested working out the parallel operation charges on sound technical basis taking into consideration advantages and disadvantages to both CPPs & CSEB and submitted its recommendation to CSERC. Accordingly CSERC has determined Grid support charges Rs.21/KVA/Month. Similarly The Hon'ble OERC has also appointed an independent third party for system study before determination of GSC.

Hon'ble Supreme court in its order on Determination of Grid support charges dated 29.11.2019 upheld the Hon'ble APERC's order quoted above concerning Grid support charges. The licensee has proposed the same grid support charges methodology approved in APERC order dated 08.02.2002 which is upheld by the Hon'ble Supreme court of India.

	<p>We request the Hon'ble Commission to engage a similar independent reputed third party to conduct a thorough analysis of system study and technical issues concerning power load throwbacks by CPPS/consuming industries, power harmonics in parallel operation of CPPs, size of the CPPs and judiciously arrive at a reasonable charge as has been followed by other state utilities to arrive of the grid support charges/parallel operation charges. TS DISCOMS also should pursue this best practice to obtain an arm's length analysis and fair rates for all constituents.</p> <p>The proposed levy of GSC at such a high rate will be a death knell for large process industries which depend upon captive power at reasonable cost. The proposed GSC will hit at the core viability of the principal industry resulting in closure of operations and in loss of direct and indirect employment aside from loss of revenue to the exchequer.</p> <p>There is no mention of basis and methodology by DISCOMS for the proposed GSC of 50% of demand charges. How the DISCOM arrived GSC 50% of demand charges and why can't it 2% or 5%?. If we consider the proposed GSC, a captive power generating plant having installed capacity of 100 MW, is needed to pay GSC Rs.2.97 Crores per month and Rs.35.63 Crores per annum, results closure of his industry in Telangana.</p> <p>Most of the CPPs installed capacities are much higher when compared to their captive load. When the installed capacity / operating capacity of captive load is much lower than installed Capacity of Power plant, it is very unfair to impose GSC based on the installed capacity of CPP.</p>	<p>The proposed grid support charges are very negligible per unit in respect of generation of captive power plants. However, if the Captive Plant Capacity is less than or equal to contracted maximum demand with licensee, such captive power plant capacity will not attract grid support charges.</p> <p>The grid support charges methodology which was approved in Tariff Orders up to FY 2008-09 is adopted and proposed for the FY 2022-23.</p> <p>As per the proposed Grid Support Charges, in case of CPPs exporting firm power to TSTRANSCO, the capacity, which is dedicated to such export, will also be additionally subtracted from the CPP capacity while calculating grid support charges.</p>
10	P R A Y E R	Research paper on "Grid Support charges on Captive power plant", by K. Balaraman, Ananthapadmanabha, R. Nagraja, K. Parthasarthy; presented

<p>That, in view of the above, we pray that the Hon'ble Commission may be graciously pleased to</p> <p>reject the proposal levy of Grid Support Charges as there is no such provision in the Statute/Electricity Act, whereas the STU /Transmission and Distribution Licensees are duty bound under Section 39 and 40 of the Electricity Act, 2003 and the National Electricity Policy, 2005 to provide connectivity to the CGPs like any generating station;</p> <p>Consider our foregoing objections, grant us a personal hearing and grant leave to adduce further evidential data in our support at the time of hearing;</p> <p>In the event the Hon'ble Commission holds the proposal of GSC is valid, within the powers and jurisdiction and are leviable, it is prayed to engage an independent reputed third party to conduct a thorough system study and technical issues concerning power load throwbacks by CPPS/consuming industries, power harmonics in parallel operation of CPPs, size of the CPPs and judiciously arrive at a reasonable charge as has been done by other state Commissions/governments TS DISCOMS also should pursue this best practice to obtain an arm's length analysis and fair rates for all constituents;</p> <p>To hold the levy till the third-party analysis is completed to the satisfaction of the Hon'ble TSERC;</p> <p>It is also requested to permit us to submit further submission, if any, during the course of public hearing either by our representative or legal counsel</p>	<p>at IIT Madras – National Power System Conference 2004 also supports Technically the application of Grid Support Charges on Captive Power Plants where in the Grid Support charges can be a certain percentage of fixed charges chargeable by the licensee to the consumers.</p>
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**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by M/s. ITC Ltd, Paperboards and Speciality Papers Division, ITC Bhadrachalam House, 106, SP Road, Sec'bad-500003**

S.No	Summary of Objections / Suggestions	Response of the Licensee
1	It is proposed by the DISCOMs that grid support charges be levied at the same rates as in the APERC order for 2002-2003. Presumably the levy is sought only on those CPPs which are co-located and operate in parallel with the grid. The proposal is unreasonable both with respect to the levy itself and also with respect to the quantum.	The levy of grid support charges is also a part of recovery of fixed charges incurred by the Distribution licensee for providing benefits of the parallel operation with Grid to the CPPs.
2	There was nothing in the Grid Code which enables and/or authorises the levy of grid support charges.	<p>Supreme Court order dt. 29.11.2019, has empowered the State Regulatory Commissions, to levy the Grid Support charges. The same is also supported by various APTEL judgments (dt. 29.09.2015-Renuka Sugars v/s. GERC, PGVCL, Gujarat TRANSCO; dt. 18.02.2012-Chhattisgarh State Power Distribution v/s. Godawari Power &amp; Ispat Ltd) and SERC orders.</p> <p>Research paper on "Grid Support charges on Captive power plant", by K. Balaraman, Ananthapadmanabha, R.Nagraja, K. Parthasarthy; presented at IIT Madras – National Power System Conference 2004 also supports Technically the application of Grid Support Charges on Captive Power Plants.</p> <p>The grid support charges are approved in Tariff Orders up to FY 2008-09 issued by the erstwhile Hon'ble APERC. The same grid support charges methodology which was in Tariff Orders up to FY 2008-09 is adopted and proposed for the FY 2022-23.</p>
3	Other than merely reproducing the provision in the previous APERC order for 2002-03, there is no reasoning given in the proposal with regard to the justification for levying grid support charges and/or the quantum of such charges with due regard to the sea change subsequently with the coming into force of the Electricity Act 2003.	<p>The advantages of parallel operation with the grid are benefited by the CPPs in addition to other facilities of other consumers. In view of the additional benefits than the normal other consumers, the CPPs who intended to use and benefit from parallel operation need to compensate through Grid Support charges.</p> <p>The said Grid Support charges are also part of Retail Supply Tariffs and these charges are proposed to levy on the CPPs who intended to use</p>

	<p>The Hon'ble Commission may consider the matter afresh having regard to the completely changed environment and regime after the Electricity Act 2003 has come into force.</p> <p>The proposed levy is of a nature that unreasonably mulct CPPs so as to discourage them. Such purpose or effect is contrary to the legislative policy and scheme of the Act which encourages captive generating plants and frees them from all manners of regulation. The proposal to levy grid support charges on captive generating plants deserves to be rejected on this ground alone.</p>	<p>and benefit from parallel operation. Hence the proposal of Grid Support charges for FY 2022-23 are well within the provisions of Act. The licensee has not denied CPPs access to the network, the captive generators who intended to use and benefit from parallel operation need to compensate through Grid Support charges.</p>
4	<p>The APERC order for 2002-2003 was made before the Electricity Act 2003 came into force. After the Electricity Act came into force, consumers have the right to source energy from any generator located anywhere under open access irrespective of whether a consumer has any contracted demand with the licensee or not. Every generator supplying energy operates in parallel with the grid. When no grid support charges are, or can be, levied based on the installed generating capacity of the source, whether it be an IPP or remote CPP under open access, there is no reason for levy of such a charge on CPPs or co-generation plants. The power and energy are measured and accounted for only with respect to the 15 minute time blocks.</p>	<p>As per the proposed grid charges conditions, the grid support charges will not be levied on the entire capacity of CPP and it will be levied only on differential capacity between CPP capacity and CMD with Distribution Licensee.</p> <p><b>Grid Support charges computation example:</b>  Captive Capacity = 100 MVA = 100,000 kVA .....[a]  CMD with Distribution licensee = 90 MVA = 90,000 kVA.....[b]</p> <p>Differential capacity = [a-b] = 10 MVA = 10,000 kVA ....[c]  GSC (Rs. Cr.) = c * 50% of Demand charges  = 10000 * (50% of say Rs. 475) / 10<sup>7</sup>  = <b>Rs. 0.2375 Cr./ month</b></p>
5	<p>It may be that certain kinds of industries may instantaneously draw large currents intermittently (e.g. in arc / induction furnaces) or produce harmonics which may or may not be in excess of the limits specified by the GTCS and/or the Grid Code. The incidence of such large intermittent / instantaneous loads and/or injection of harmonics in such industries may occur irrespective of their having a contracted demand with the licensee for the whole of their demand or for a part of their demand in conjunction with a CPP. These industries may have to be considered as a separate class. It is unreasonable that the incidents in such separate class</p>	<p><b>Comparison of GSC with other states like Madhya Pradesh, Gujarat, Tamil Nadu, Chhattisgarh</b></p> <p>Consider GSC @ Rs. 25 / kVA / month  Captive Capacity = 100 MVA = 100,000 kVA  GSC (Rs. Cr.) = 25 * 100000 / 10<sup>7</sup>  = <b>Rs. 0.25 Cr. / month</b></p>

	taints all industries with CPPs even when no such instantaneous or intermittent loads or injection of harmonics are involved.	<b>Thus GSC determined by TS Discoms is very much justifiable.</b>
6	<p>Industries may have CPPs with a capacity in excess of the captive requirement, and operation in parallel with the grid may be necessitated by the need to export their surplus power under open access or otherwise. There can be no justification for levy of grid support charges in such cases.</p> <p>An industry with a CPP may connect to the grid for the purpose of importing additional power from another source under open access. There can be no justification for levy of grid support charges in such cases also.</p> <p>An industry with a CPP may also connect to the grid to avail start-up power for which a contracted demand is arranged and paid for by the consumer. There can be no justification for any grid support charges.</p>	<p>The grid support charges are not for drawl of power from the Distribution Licensee, but for utilization of parallel operation benefits by captive generators.</p> <p>However, if the Captive Plant Capacity is less than or equal to contracted maximum demand with licensee, such captive power plant capacity will not attract grid support charges.</p> <p>The licensee has not denied CPPs access to the network; the captive generators who intended to use and benefit from parallel operation need to compensate through Grid Support charges.</p>
7	<p>If at all, it is the load (and more particularly, certain kinds of load) that may be alleged to impose instantaneous / intermittent demands on the grid. If some loads in some type of industries are considered to cause instantaneous demand on the grid, then it is only such loads that could be relevant if at all any grid support charge is to be levied.</p> <p>The installed generation capacity is irrelevant and the levy on a charge on the generation capacity is irrational.</p>	
8	Without prejudice to the above, the quantum proposed is entirely arbitrary, exorbitant and irrational. There is no justification or rationale for the quantum proposed. The licensee can be allowed a charge only if the licensee demonstrates actual costs related to such charge. There are no extra costs incurred by the licensee for the alleged or presumed effects of operation of CPPs in parallel with the grid. There has to be some cogent methodology for arriving at the quantum of the charge. It cannot be arbitrary and without any data or rational basis.	<p>As per the proposed grid charges conditions, the grid support charges will not be levied on the entire capacity of CPP and it will be levied only on differential capacity between CPP capacity and CMD with Distribution Licensee.</p> <p><b>Grid Support charges computation example:</b>  Captive Capacity = 100 MVA = 100,000 kVA .....[a]  CMD with Distribution licensee = 90 MVA = 90,000 kVA.....[b]</p>

	Capacity of the surplus being sold under open access cannot be subjected to any such charges.															
9	<p>The following position in other States which have levied / considered Grid Support Charges may also be duly considered.</p> <table border="1"> <thead> <tr> <th>State</th> <th>Parallel Operation / Grid Support Charge</th> </tr> </thead> <tbody> <tr> <td>Gujarat</td> <td>Rs. 26.50 / kVA/ month</td> </tr> <tr> <td>Rajasthan</td> <td>Rs. 20.00 / kVA / month</td> </tr> <tr> <td>Madhya Pradesh</td> <td>Rs. 20.00 / kVA/ month</td> </tr> <tr> <td>Tamil Nadu</td> <td>Rs 30,000 /MW / month</td> </tr> <tr> <td>Chhattisgarh</td> <td>Rs.O.13 /kWh</td> </tr> <tr> <td>Orissa</td> <td>Nil — OERC rejected the proposal observing that the Grid Code has sufficient provisions for regulating the connected entity and no charges were called for.</td> </tr> </tbody> </table> <p>It is evident from the above that the charges proposed by the DISCOMs are exorbitant apart from being without any rational basis or method.</p>	State	Parallel Operation / Grid Support Charge	Gujarat	Rs. 26.50 / kVA/ month	Rajasthan	Rs. 20.00 / kVA / month	Madhya Pradesh	Rs. 20.00 / kVA/ month	Tamil Nadu	Rs 30,000 /MW / month	Chhattisgarh	Rs.O.13 /kWh	Orissa	Nil — OERC rejected the proposal observing that the Grid Code has sufficient provisions for regulating the connected entity and no charges were called for.	<p>Differential capacity = [a-b] = 10 MVA = 10,000 kVA ....[c]  GSC (Rs. Cr.) = c * 50% of Demand charges  = 10000 * (50% of say Rs. 475) / 10<sup>7</sup>  = <b>Rs. 0.2375 Cr./ month</b></p> <p><b>Comparison of GSC with other states like Madhya Pradesh, Gujarat, Tamil Nadu, Chhattisgarh</b></p> <p>Consider GSC @ Rs. 25 / kVA / month  Captive Capacity = 100 MVA = 100,000 kVA  GSC (Rs. Cr.) = 25 * 100000 / 10<sup>7</sup>  = <b>Rs. 0.25 Cr. / month</b></p> <p><b>Thus GSC determined by TS Discoms is very much justifiable.</b></p>
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10	It is submitted that the Hon'ble Commission may cause a detailed scientific study by a competent organisation to be undertaken to assess the issue having regard to the diverse nature of the industries with CPPs, and to determine the particular criteria by which grid support may be considered to have been availed, and to lay out a methodology by which the quantum of charge, where considered leviable, is to be determined.															

**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by M/s. Zuari Cement Limited, Sitapuram Cement Works, Dondapadu, Nalgonda District -508246**

S.No	Summary of Objections / Suggestions	Response of the Licensee
1	<p>The Distribution Licensees in Telangana have proposed, inter alia, a levy of Grid Support Charges on Captive Power Plants (CPPs) in Telangana for parallel operation with Grid as mentioned below.</p> <p>"Persons operating Captive Power Plants (CPPs) in parallel with T.S. Grid have to pay 'Grid Support Charges 'for FY 2022-23 on the difference between the capacity of CPP in kVA and the contracted Maximum Demand in kVA with Licensee and all other sources of supply, at a rate equal to 50% of the prevailing demand charge for HT Consumers. In case of CPPs exporting firm power to TSTRANSCO, the ix capacity, which is dedicated to such export, will also be additionally subtracted from the CPP capacity.</p> <p>In the ARR, The DISCOMS preferred to consider the above term considering the erstwhile APERC's Order dated 08.02.2002 and referring the para 64 of Judgement of Hon'ble Supreme Court Order dated 29.11.19, the excerpt of which is as below,</p> <p>64. Any Government Order or Incentive Scheme does not govern the Grid Support Charges. Grid Code is the basis for levy of the Grid Support Charges, which came to be approved by the Commission on 26.5.2001. The same is also reflected in the impugned order. The Grid Support Charges can be levied, and the order dated 8.2.2002 of the Commission is, thus on the parity of the reasonings, has to be upheld considering the provisions of Section 21 (3) of the Reforms Act, 1998. Under section II read with section 26 of the Reforms Act, 1998, all fixed charges under the distribution and Grid Support Charges are leviable only at the instance of a distribution company, and because of the discussion above, the Commission has the powers to determine it. In the agreements also there is a power where the Board could have fixed the Grid Support Charge unilaterally, but because of Reforms Act, 1998 came to be enacted, the application was filed in the Commission. After that, the Commission has passed</p>	<p>The levy of grid support charges is also a part of recovery of fixed charges incurred by the Distribution licensee for providing benefits of the parallel operation with Grid to the CPPs</p> <p>Hon'ble Supreme court in its order on Determination of Grid support charges dated 29.11.2019 upheld the Hon'ble APERC's order quoted above concerning Grid support charges. The licensee has proposed the same grid support charges methodology approved in APERC order dated 08.02.2002 which is upheld by the Hon'ble Supreme court of India.</p>

	<p>the order in accordance with the law. We find no fault in the same. Thus, the order of the Commission concerning the Grid Support Charges has to be upheld...</p> <p>The Hon'ble Supreme Court has upheld the Order of APERC considering the provisions of the Reforms Act, 1998. But unfortunately, there was no mention about the provisions of the Electricity Act 2003. In fact there is no provision in EA 2003 for determination of Grid Support Charges</p>	
2	<p>We, Zuari Cement Limited own a group captive power plant of 43 MW at Dondapadu, Chintalapalem Mandal, Suryapet District , Telangana -508246 and we are supplying Power to M/S Zuari cement limited , Sitapuram Cement works ( SPT 206) located in Dondapadu Telangan state through dedicated line and to M/S Zuari cement limited, ( CDP — 049) Located at Yeraguntla Andhra Pradesh through open access bilateral transaction wish to submit our objections and concerns on the proposed levy of Grid Support Charges by TS DISCOMS as under.</p>	No comments
3	<p>While proposing the above, the DISCOMs have considered the following advantages to CPPs relying on The Hon 'ble Chhattisgarh State Electricity Regulatory Commission's (CSERC) discussion paper on parallel operation charges dated 01.06.2008 and Order dated 31.12,2008, the excerpt of which is as follows:</p> <p>"10.1 Advantages to CPPs:</p> <p>(1) The fluctuations in the load are absorbed by the utility grid in the parallel operation mode. This will reduce the stresses on the captive generator and equipments. The bulk consumer can operate his generating units at constant power generation mode irrespective ofhis load cycle.</p> <p>(2) Fluctuating loads of the industries connected in parallel with the grid inject harmonics into the grid. The current harmonics absorbed by the utility grid is much more than that by CPP generator. These harmonics flowing in the grid system are harmful to the equipments and are also responsible for polluting the power quality ofthe system.</p>	No comments

	<p>(3) Negative phase sequence current is generated by unbalance loads. The magnitude of negative phase sequence current is much higher at the point of common coupling than at generator output terminal. This unbalance current normally creates problem of overheating of the generators and other equipments of CPP, if not running in parallel with grid. When they are connected to the grid, the TSNPDCL Tariff &amp; Cross Subsidy Surcharge Proposals for FY2022-23 33</p> <p>negative phase sequence current flows into the grid and reduces stress on the captive generator.</p> <p>(4) Captive power plants have higher fault level support when they are running in parallel with the grid supply. Because of the higher fault level, the voltage drop at load terminal is less when connected with the grid.</p> <p>(5) On account of increase in plant load factor of captive generator, additional revenues can be generated by the CPPs by sale of surplus power to the utility.</p> <p>(6) In addition to the above, CPPs enjoy the following advantages also: (i) In case of fault in a CPP generating unit or other equipment, bulk consumers can draw the required power from the grid and can save their production loss. (ii) The grid provides stability to the plant to start heavy loads like HT motors. (iii) The variation in the voltage and frequency at the time of starting large motors and heavy loads, is minimized in the industry, as the grid supply acts as an infinite bus. The active and reactive power demand due to sudden and fluctuating load is not recorded in the meter. (iv) The impact created by sudden load throw off and consequent tripping of CPP generator on over speeding is avoided with the grid taking care of the impact. (v) The transient surges reduce the life of equipment of the CPP. In some cases, the equipment fails if transient is beyond a limit. If the system is connected to the grid, it absorbs the transient load. Hence, grid enhances the life of CPP equipments..</p>	
4	In the above matter, The Power Distribution Companies in Telangana and The Hon'ble Telangana Electricity Regulatory Commission have invited the stakeholders	No comments

	to file their comments/suggestions/objection, if any, on or before 5.0 pm on 28.01.2022.	
5	<p><b>HISTORY OF GRID SUPPORT CHARGES (GSC):</b></p> <p>1. The Grid Support Charge (GSC) was initially levied by the erstwhile Hon'ble APERC vide Order in O.P.No. 1 of 1999 dated 08.02.2002 in the context of the AP Electricity Reform Act, 1998. The GSC order was implemented vide Tariff Order FY 2002-03 from 01.04.2002. The same was challenged before the Hon'ble High Court for the erstwhile State of A.P which was decided in favour of the generators/Captive Power Producers (CPPs) by setting aside the levy of grid support charges. An Appeal was filed by APTransco (Civil Appeal No. 4569 of 2003) in the Hon'ble Supreme Court. The Hon'ble Supreme Court, vide its judgement dated 29.11.2019 affirmed the orders of the erstwhile Commission.</p> <p>2. The prevailing conditions during 2002 and the present are totally different. Then the Electricity Act, 2003 had not come into existence and SLDC had no separate statutory identity then and SLDC revenue was part of APTRANSCO.</p> <p>3. There was lot of indiscipline in Transmission Companies. States were exceeding the drawal limits as there was no stringent enforcement mechanism. The result is that, we have witnessed failure of Noflhern grid in Jan 2, 2001 and 230 million people were affected.</p> <p>4. There was no concept of Open Access, and Transmission and 'Wheeling were allowed by means of mutually agreed agreements as per the prevailing statutes viz. The Indian Electricity Act, 1910, The Electricity (Supply) Act, 1948 and rules made thereunder.</p> <p>5. It is pertinent to note that the erstwhile APERC was constituted under the AP Electricity Reform Act, 1998, and has passed the order in O.P.No.1 of 1999 in exercise of its powers under the said Act.</p>	<p>Supreme Court order dt. 29.11.2019, has empowered the State Regulatory Commissions, to levy the Grid Support charges. The same is also supported by various APTEL judgments (dt. 29.09.2015-Renuka Sugars v/s. GERC, PGVCL, Gujarat TRANSCO; dt. 18.02.2012-Chhattisgarh State Power Distribution v/s. Godawari Power &amp;Ispat Ltd) and SERC orders.</p> <p>Research paper on "Grid Support charges on Captive power plant", by K. Balaraman, Ananthapadmanabha, R. Nagraja, K. Parthasarthy; presented at IIT Madras – National Power System Conference 2004 also supports Technically the application of Grid Support Charges on Captive Power Plants.</p> <p>The grid support charges are approved in Tariff Orders up to FY 2008-09 issued by the erstwhile Hon'ble APERC. The same grid support charges methodology which was in Tariff Orders up to FY 2008-09 is adopted and proposed for the FY 2022-23.</p>
6	<b>THE IMPACT OF THE ELECTRICITY ACT, 2003:</b>	



1. In 2003, the Electricity Act, 2003 ("Act") came into force. The Act brought in substantial changes to the previous regime, including the establishment of State Commissions, delicensing of Generation, unbundling of transmission and distribution, specification of tariffs and charges, crystallized the scheme of Open Access, brought in procedures and standards to enforce discipline, etc. However, it left the Commissions established by States under earlier State enactments (such as the AP Electricity Reform Act, 1998) untouched and treated them to be Commissions established under the Act, essentially conferring them with powers under both Acts, in as much as the State enactments were not in derogation to the Act.

2. Open Access was introduced under Section 42 of the Act, in pursuance to which APERC Regulation Nos.2 of 2005 and 2 of 2006 were also promulgated by the erstwhile Commission. The Grid Code came into existence. In 2021, this Hon'ble Commission also notified Regulation No.3 of 2021 to maintain grid discipline and grid security as envisaged under the State Electricity Grid Code through the commercial mechanism for Deviation Settlement for controlling drawal and injection of electricity by the users of the grid.

3. CPP's are exempt from the payment of CSS as per the 4th proviso to S.42(2) of the Act, as the legislature intended to reduce the charges on CPP's in order to encourage generation. Further, S.86(1)(e) of the Act also prescribes that generation from cogeneration sources be promoted.

4. Now, as there is an established mechanism to bring discipline among the Generators and Consumers by levying various charges as per the Grid Code, Open Access (OX) Regulations. Both OA Consumers and OA Generators are supposed to declare Week Ahead and Day Ahead Schedules.

5. SLDC/RLDC is the nodal agency to maintain Grid discipline and optimum scheduling and despatch of electricity under Sections 28 and 32 of the Act. Every Licensee, Generating companies and other persons connected with the operation of power system are under strict obligation to comply with the directions issued by

RLDC (Section 29(1) of the Act) and SLDC (S.33(1) of the Act) as per the Regulations prescribed by the appropriate Commission.

6. Under the provisions of the Act, a separate agency by SLDC/RLDC/NLDC were created to take care of the Grid. SLDC/RLDC is responsible for maintaining grid security, Load forecasting, scheduling and despatching and balancing of generation and demand (load). The ARR of SLDC was already approved in the MYT Tariff 2021-23. The DISCOMs have no role in maintaining Grid security and have to comply with the directions issued by SLDC/RLDC. Hence, in the present scenario, there is no need to propose GSC by DISCOMs and the DISCOMs have no role in seeking GSC.

7. TSTRANSCO and DISCOMs are responsible for Transmission and Wheeling business and can levy these charges only while the levy of GSC is under the purview of SLDC only. Therefore, TSTRANSCO and DISCOMs have nothing to do with GSC. The ARR of Transmission and DISCOMs distribution business is recovered through Transmission charges and wheeling charges as approved in the relevant MYT orders. As the present ARR and Tariff proposal is to recover the retail supply business costs, the DISCOM has no role in proposing any GSC.

8. It is also pertinent to note that this Hon 'ble Commission is constituted under the Act, and thus the earlier AP Electricity Reform Act, 1998 under which GSC were earlier determined is neither applicable nor relevant in the present day. The Act, 2003 specifically lays down the charges and tariffs to be collected, and no charges beyond what is prescribed can be levied. Admittedly, there is no charge such as GSC mentioned in the Act or the regulations, let alone under S.62 under which the present petitions are filed, and as such, any such proposal to levy GSC is without jurisdiction.

9. It is thus submitted that the scope of present ARR for Retail Supply Business for FY 2022-23 should be strictly confined in terms of Section 62 of the Act r/w Regulation 4 of 2005 as adopted under Regulation 1 of 2014, and Section 42 of the Act for the purpose of determination of CSS and any proposal of the DISCOMs to levy GSC is itself misconceived and patently without jurisdiction.

The grid support charges are being proposed by the Distribution Licensee for consumers who are having parallel operation of Captive Power Plants. The Distribution Licensee's 132kV & above level HT consumers are not paying Transmission charges & SLDC charges to respective entities even though connected to 132kV & above level. These consumers are paying retail supply Tariffs as approved by the Hon'ble State Commission from time to time which is inclusive of all costs (Incl SLDC & Transmission Charges).

The advantages of parallel operation with the grid are benefited by the CPPs in addition to other facilities of other consumers. In view of the additional benefits than the normal other consumers, the CPPs who intended to use and benefit

7	<p>Captive Power Generation is delicensed under the Electricity Act so as to lessen the burden on the Grid in meeting the distributed loads. The provision</p> <p>in Para 5.226 of National Electricity Policy 2005 notified by Govt of India laid emphasis on grid connectivity of captive generators even under open access regime which is reproduced below:"</p> <p>"Under the Act, captive generators have access to licensees and would get access to consumers who are allowed open access. Grid inter-connection for captive generators shall be facilitated as per Section 30 of the Act. This should be done on priority basis to enable captive generation to become available as distributed generation along with the grid.</p> <p>In the spirit of this legislation and rules framed thereunder, determination of Grid Support or Parallel Operation Charge should follow the principles of transparency, actual forbearance and fair computation based on time tested methodology. The proposed levy does not meet any of these criteria and is arbitrary.</p>	<p>from parallel operation need to compensate through Grid Support charges.</p> <p>The said Grid Support charges are also part of Retail Supply Tariffs and these charges are proposed to levy on the CPPs who intended to use and benefit from parallel operation. Hence the proposal of Grid Support charges for FY 2022-23 are well within the provisions of Act.</p> <p>The licensee has not denied CPPs access to the network, the captive generators who intended to use and benefit from parallel operation need to compensate through Grid Support charges.</p>
8	<p>In the case of CPPs availing Open Access for transmission and wheeling of power from the generation point to the consumption point, Grid levies charges as determined by the regulator from to time. Even in these cases there is an established mechanism of UI charges which essentially address the so-called grid support or parallel operation, A similar time tested methodology should be devised for such CPPs that do not avail open access so that Grid is adequately compensated for forbearance, if any, in providing parallel operation to CPPs. The proposed levy by the TSDISCOMs is therefore quite arbitrary, excessive and is not supported by quantifiable data.</p>	<p>TS Discoms wants to state that the UI charges are levied to the tune up to ~12% of the deviation charges in the case where a Generator or a Discoms deviates from their said drawl or injection schedule.</p> <p>However, if the same generator or to be particular a captive power plant deviates from its said injection schedule say upto a quantum of more than 12% then this level of deviation is absorbed by the Grid. In this case Grid acts as a stabilizer. Thus UI charges amount for only a fraction of the quantum of deviation, whereas Grid support charges help to further develop the grid to absorb the rest of deviations.</p>
9	<p>5.5 The Transmission system of the Transco/Discom should be so designed that it should take care of fluctuating load of the consumer as it is the duty of the transmission licensee under Section 40 of Electricity Act, 2003. Moreover, variation of load of a consumer having CGP is much less than a consumer without CGP.</p>	<p>As per the proposed grid charges conditions, the grid support charges will not be levied on the entire capacity of CPP and it will be levied only on differential capacity between CPP capacity and CMD with Distribution Licensee.</p>

<p>1. CGPs absorb some amount of harmonics whereas a consumer without CGP inject full quantum of harmonics generated to the grid.</p> <p>2. The unbalanced voltage of the grid is a source of negative phase sequence current which is absorbed by the generators of CGP.</p> <p>3. Fault level depends upon the generation capacity connected to the grid. The parallel operation of CGPs with the grid is infact beneficial with some degree of voltage support that the CGPs extend to the Grid</p> <p>4. As per Regulations of Supply Code, Industries having CGPs can draw emergency power up to the capacity of largest generating unit by paying required tariff. CPP's drawl of power is limited to "start-up power" that too when there is total loss of generation of the CPP. The drawl of power for production purposes, is limited to the CMD as per the Power Supply Agreement with the DISCOM. Otherwise, penalty is attracted. Overdrawl is prevented by proper setting of the relays at the Grid Sub-station.</p> <p>5. It is wrong to state that active and reactive power demand due to sudden and fluctuating load are not recorded in the meter. Billing is done for all consumers by integration over 15 minutes' period and this is also applicable for CPPs and so it does not result in any undue advantage.</p> <p>6. Due to injection of power by CGPs the load on the transformers in the grid reduces resulting in less transformer loss."</p> <p>7. The CGP are acting as distributed generator at the load center for which the transmission and distribution loss has been reduced to great extent.</p> <p>8. As per Section 7 of the Electricity Act, 2003 any generating company may establish operate and maintain a generating station if it complies with State Grid Code and standards of grid connectivity as referred in Section 73 (b) of the Act. Both Tariff Policy and National Electricity Policy emphasizes the unhindered connectivity of CGPs to the grid. The proposed and arbitrary quantum of Grid Support Charge</p>	<p>Grid Support charges computation example:  Captive Capacity = 100 MVA = 100,000 kVA .....[a]  CMD with Distribution licensee = 90 MVA = 90,000 kVA.....[b]</p> <p>Differential capacity = [a-b] = 10 MVA = 10,000 kVA ....[c]  GSC (Rs. Cr.) = c * 50% of Demand charges  = 10000 * (50% of say Rs. 475) / 10<sup>7</sup>  = Rs. 0.2375 Cr./ month</p> <p>Comparison of GSC with other states like Madhya Pradesh, Gujarat, Tamil Nadu, Chhattisgarh</p> <p>Consider GSC @ Rs. 25 / kVA / month  Captive Capacity = 100 MVA = 100,000 kVA  GSC (Rs. Cr.) = 25 * 100000 / 10<sup>7</sup>  = Rs. 0.25 Cr. / month</p> <p>Thus GSC determined by TS Discoms is very much justifiable.</p> <p>The grid support charges are not for drawl of power from the Distribution Licensee, but for utilization of parallel operation benefits by captive generators.</p> <p>However, if the Captive Plant Capacity is less than or equal to contracted maximum demand with licensee, such captive power plant capacity will not attract grid support charges.</p> <p>The licensee has not denied CPPs access to the network; the captive generators who intended to use and benefit from parallel operation need to compensate through Grid Support charges.</p>
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makes the captive power generation unviable and the spirit of the act and the rules framed thereunder are thus vitiated.

9. There is no provision in the statute empowers the DISCOMS to levy Grid Support Charges on the CPPs. They, on the other hand as CPPs absorbed some amount of harmonics. On the contrary consumer without CGPs transmit full quantum of harmonics to the grid. The DISCOMS/TRANSCO is not taking any step to install suitable equipment to filter the harmonics and injecting those pollutants to the grid for which the CPPs are forced to suffer. The grid voltage is always unbalanced due to various categories of consumers and hence is a source of negative phase sequence current which cause stress on the generators of CPPs. Transco being the STU of Telangana should find some means to prevent the same

10. It is relevant to mention the observation and comments of The Hon'ble Orissa Electricity Regulatory Commission in the similar matter, in its Order dated 31.03.2014 in Case No. 46/2012, the excerpt of which is as follows:

i) Para- 15 of Order:

"We heard the parties at length and also perused the technical report submitted by OPTCL. The present installed capacity of the CGPs in the State as submitted by OPTCL is 5173 MW which is more than or equal to capacity of other generators connected to Odisha Grid including Odisha share of power from Central Generation Stations. We agree with the contention of CCPPO that the pollutants of the Grid like fluctuations in frequency and voltage, negative phase sequence, distortion due to harmonics etc. are the resultant effect of all synchronous machines like generators and motors of the Grid system. These pollutants are injected in to the grid not only by CGPs but also by other independent generators and machines like motors and arc furnaces of the consumers. Holding industry having CGPs only responsible for this is not correct' ii) Para-16 of Order:

"After going through the submission of various stake holders of the grid system we conclude that the behaviour of industries having CGPs and also without CGPs varies case to case basis. There are ample provisions in the Odisha Grid Code to regulate the behaviour of entities connected to the OPTCL system. Hence, a generic method

The advantages of parallel operation with the grid are benefited by the CPPs in addition to other facilities of other consumers. In view of the additional benefits than the normal other consumers, the CPPs who intended to use and benefit from parallel operation need to compensate through Grid Support charges. The said Grid Support charges are also one of the components in Retail Supply Tariffs and these charges are proposed to levy on the CPPs who intended to use and benefit from parallel operation. Hence the proposal of Grid Support charges for FY 2022-23 are well within the provisions of Act.

of calculation of Grid Support Charges for all industries may not be proper. The Petitioner has failed to submit a State-wide study before us on which a decision could have been taken. One solution fits all can't be applicable here. So implementation of a model of another State in our State will not be proper.

iii) Para- 17 of Order:

"There are enough provisions in Odisha Grid Code, 2006 to maintain quality supply in the grid system. Regulation 4.7 of Odisha Grid Code discuss elaborately the ideal behavior of constituents of the Grid. OPTCL should play the role of watchdog and analyze the pollutant injected by various constituents of the grid system. CGPs and industries injecting pollution should be directed to take up remedial measures like installation of capacitors, filters for harmonics, etc. so that grid pollution will be minimized. The non-compliance by any industry or industry having CGP of the Grid Code should be dealt as per Regulation 1.18 of OGC, 2006. Therefore, the prayer of OPTCL for levy of Grid Support Charges is not acceptable."

11. Just as in the case of Original proposal when GSC was proposed at 50% of the then applicable Demand Charge of Rs 170 per KVA during the year 2002, the current proposal of 50% of the Demand Charge of Rs 475 per KVA per month is also not supported by any data proving that the grid suffered to this extent in providing parallel operations to CPPs.

12. CPPs involve heavy capital investments and are necessitated to provide fillip to the main consumption industry utilizing captive power at reasonable rate as opposed to fluctuating and ever-increasing grid tariff.

13. Further, the Original proposal when GSC was proposed by APERC during the year 1999 and 2002, the Electricity Act is not in force. The Act is in force from 2003 and Section 9 of Electricity Act does not difference between

CGP and IPP as far as grid connectivity is concerned and hence both should be treated equitably from the viewpoint of grid connectivity and support.

<p>14. The proposed levy of GSC aims to stifle the consuming industries by this arbitrary levy, which in turn erodes the viability of the principal industry to a point that it must perform cease operations.</p> <p>15. The CPPs who are predominantly coal-fired, are already subjected to substantial increases in coal cost being supplied by the State mining companies and have no window to absorb such high levies such as the proposed GSC.</p> <p>16. CPPs have repeatedly expressed their willingness to provide additional protections in their facilities as desired by the grid to see that no untoward load throwbacks or fault currents or reactive power surges happen.</p> <p>17. The original levy of GSC in 1999 was proposed when the generation shortfall was prevailing, and the TSDISCOMS were going through occasional R&amp;C periods and frequency fluctuations, etc. when the Regulator considered that the proposed levy had merits. However, the TS Grid has since improved / made many strides in Grid size, availability of power and attained stability and is one of the few Grids in the country being engaged in export of power on a steady basis. Aggregate capacity of the CPPs now is relatively marginal compared to the Grid Size and no real forbearance could be possible warranting such huge and arbitrary levy.</p> <p>18. Grid Support Charges can not be a substitute for Demand or Capacity Charges which are determined on a wider basis by the regulator. So the proposed levy of Grid Support Charges based on applicable demand charge is arbitrary, excessive and results in undue enrichment of the TSDISCOMs at the expense of CPPs</p> <p>19. Determination of the Grid Support Charges based on CPP capacity in KVA lacks merits while the entire power systems in the premises of CPP are approved by CEIG in KW, Aside from this even the export contracts either bilateral or under the Exchanges are settled in MWs. So the quantification of the Grid Support Charge, if any, has to be in KW.</p>	<p>The grid support charges were approved in Tariff Orders up to FY 2008-09 issued by the erstwhile Hon'ble APERC.</p> <p>The advantages of parallel operation with the grid are benefited by the CPPs in addition to other facilities of other consumers. In view of the additional benefits than the normal other consumers, the CPPs who intended to use and benefit from parallel operation need to compensate through Grid Support charges.</p> <p>The grid support charges methodology which was approved in Tariff Orders up to FY 2008-09 is adopted and proposed for the FY 2022-23.</p>
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20. We request the Hon'ble Commission to allow the CPPs to delink from the Grid if the Grid Support Charges were to be unwieldy and unviable to the extent of power out of the CPP capacity that they can run in island mode.

21. The Grid situation therefore requires to be thoroughly reviewed with reference to the fact whether the Grid suffers any forbearance in providing parallel operations of CPPs. We request the Hon'ble Commission to procure from the Licensees that such a review be conducted on an arms-length basis by an independent third party, taking into account the actual power harmonics, fault currents or load throwbacks as claimed by TSDISCOMS and also to arrive at a justifiable and reasonable charge based on actual cost / damage suffered by the Grid, if any, in providing such parallel operations to CPI's.

22. The prevailing parallel operation charge which is equivalent to the proposed GSC in other States is as follows:

Name of the State	Grid Support Charges Rs./KVA/Month
Madhya Pradesh	Rs.20/KVA/Month
Rajasthan	Rs.20/KVA/Month
Gujarat	Rs.26/KVA/Month
Tamilnadu	Rs.30/KVA/Month
J&K	Rs.16/- per kVA per month on the installed capacity of
Karnataka	Nil
Kerala	Nil
Odisha	Nil

Hon'ble Supreme court in its order on Determination of Grid support charges dated 29.11.2019 upheld the Hon'ble APERC's order quoted above concerning Grid support charges. The licensee has proposed the same grid support charges methodology approved in APERC order dated 08.02.2002 which is upheld by the Hon'ble Supreme court of India.

As per the proposed grid charges conditions, the grid support charges will not be levied on the entire capacity of CPP and it will be levied only on differential capacity between CPP capacity and CMD with Distribution Licensee.

Grid Support charges computation example:

Captive Capacity = 100 MVA = 100,000 kVA .....[a]

CMD with Distribution licensee = 90 MVA = 90,000 kVA.....[b]

Differential capacity = [a-b] = 10 MVA = 10,000 kVA ....[c]

GSC (Rs. Cr.) = c \* 50% of Demand charges

= 10000 \* (50% of say Rs. 475) / 10<sup>7</sup>

= Rs. 0.2375 Cr./ month

Comparison of GSC with other states like Madhya Pradesh, Gujarat, Tamil Nadu, Chhattisgarh

Consider GSC @ Rs. 25 / kVA / month

Captive Capacity = 100 MVA = 100,000 kVA

GSC (Rs. Cr.) = 25 \* 100000 / 10<sup>7</sup>

= Rs. 0.25 Cr. / month

Thus GSC determined by TS Discoms is very much justifiable



	West Bengal	Nil	
10	<p>The above utilities have proposed these rates after third party analysis. From the above table it can be seen that the parallel operation charge or GSC in other States has been worked out based on clear parameters of the costs incurred by the Grid and so are considered reasonable as against the proposed levy of 50% of the Demand Charge of Rs 475 per KVA per month, proposed by TSDiscoms. The proposed levy has no basis and is grossly excessive, arbitrary, and so requires to be reduced substantially and validated by an independent third-party analysis.</p>		<p>It may please be noted that, before determination of GSC, The Hon'ble Chhattisgarh State Electricity Regulatory Commission (CERC) has assigned this responsibility to an independent third party M/s. Electrical Research &amp; Development Association (ERDA) to study various system data and system parameters of representative selected CPPs. Accordingly, ERDA has measured various system parameters like harmonics, unbalance current, plant load factor, load cycle, fault level calculations etc by measurement on selected CPPs and relevant substation and finally ERDA has suggested working out the parallel operation charges on sound technical basis taking into consideration advantages and disadvantages to both CPPs &amp; CSEB and submitted its recommendation to CERC. Accordingly, CERC has determined Grid support charges Rs.21/KVA/Month. Similarly The Hon'ble OERO has also appointed an independent third party for system study before determination of GSC.</p> <p>Research paper on "Grid Support charges on Captive power plant", by K. Balaraman, Ananthapadmanabha, R. Nagraja, K. Parthasarthy; presented at IIT Madras – National Power System Conference 2004 also supports Technically the application of Grid Support Charges on Captive Power Plants where in the Grid Support charges can be a certain percentage of fixed charges chargeable by the licensee to the consumers.</p>

11	We request the Hon'ble Commission to engage a similar independent reputed third party to conduct a thorough analysis of system study and technical issues concerning power load throwbacks by CPPS/consuming industries, power harmonics in parallel operation of CPPs, size of the CPPs and judiciously arrive at a reasonable charge as has been followed by other state utilities to arrive of the grid support charges/parallel operation charges. TS DISCOMS also should pursue this best practice to obtain an arm's length analysis and fair rates for all constituents.	
12	The proposed levy of GSC at such a high rate will be a death knell for large process industries which depend upon captive power at reasonable cost. The proposed GSC will hit at the core viability of the principal industry resulting in closure of operations and in loss of direct and indirect employment aside from loss of revenue to the exchequer.	The proposed grid support charges are very negligible per unit in respect of generation of captive power plants. However, if the Captive Plant Capacity is less than or equal to contracted maximum demand with licensee, such captive power plant capacity will not attract grid support charges.
13	There is no mention of basis and methodology by DISCOMS for the proposed GSC of 50% of demand charges. How the DISCOM arrived GSC 50% of demand charges and why can't it 2% or 5%?. If we consider the proposed GSC, a captive power generating plant having installed capacity of 100 MW, is needed to pay GSC Rs.2.97 Crores per month and Rs.35.63 Crores per annum, results closure of industry in Telangana.	The grid support charges methodology which was approved in Tariff Orders up to FY 2008-09 is adopted and proposed for the FY 2022-23.  As per the proposed Grid Support Charges, in case of CPPs exporting firm power to TSTRANSCO, the capacity, which is dedicated to such export, will also be additionally subtracted from the CPP capacity while calculating grid support charges.
14	Most of the CPPs installed capacities are much higher when compared to their captive load. When the installed capacity / operating capacity of captive load is much lower than installed Capacity of Power plant, it is very unfair to impose GSC based on the installed capacity of CPP.	
15.	PRAYER That, in view of the above, we pray that the Hon 'ble Commission may be graciously pleased to a) Reject the proposal levy of Grid Support Charges as there is no such provision in the Statute/Electricity Act, whereas the STU /Transmission and Distribution Licensees are duty bound under Section 39 and 40 of the Electricity Act,	The said Grid Support charges are also part of Retail Supply Tariffs and these charges are proposed to levy on the CPPs who intended to use and benefit from parallel operation. Hence the proposal of Grid Support charges for FY 2022-23 are well within the provisions of Act. However, the full Bench of Tribunal in Appeal No. 120 of 2009 relating to Parallel Operation Charges (Grid Support Charges)

<p>2003 and the National Electricity Policy, 2005 to provide connectivity to the CGPs like any generating station;</p> <p>b) Consider our foregoing objections, grant us a personal hearing and grant leave to adduce further evidential data in our support at the time of hearing;</p> <p>c) In the event the Hon'ble Commission holds the proposal of GSC is valid, within the powers and jurisdiction and are leviable, it is prayed to engage an independent reputed third party to conduct a thorough system study and technical issues concerning power load throwbacks by CPPS/consuming industries, power harmonics in parallel operation of CPPs, size of the CPPs and judiciously arrive at a reasonable charge as has been done by other state Commissions/governments TS DISCOMS also should pursue this best practice to obtain an arm's length analysis and fair rates for all constituents;</p> <p>d) To hold the levy till the third-party analysis is completed to the satisfaction of the Hon'ble TSERC;</p> <p>e) It is also requested to permit us to submit further submission, if any, during the course of public hearing either by our representative or legal counsel</p>	<p>in Chhattisgarh by Order dated 18.02.2011 stated that the State Commission is empowered to deal with the question as to whether the levy of parallel operation charges is permissible or not. This aspect has been dealt with by this Tribunal in judgment dated 12.9.2006 in Appeal No.99 of 2006. In the said judgment, this Tribunal upheld the levy of parallel operation charges by the State Commission. Further, the Apex Court of India by its judgment dated 29.11.2019 in Civil Appeal No 8969 of 2003 (Grid Support Charges Batch matters) held that the State Electricity Regulatory Commission is vested with the power to determine the grid support charges.</p>
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**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by Sri Luxmi Tulasi Agro Paper (P) Ltd, Main Road,Aswaraopeta,Dist:Kothagudem-507301**

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>The proposed grid support charges are not only arbitrary but also suffers from legal infirmity. There is no provision in Electricity Act, 2003 or in any Regulation of TSERC to determine Grid Support Charges or Parallel Operation Charges. The provision in Para 5.2.26 of National Electricity Policy 2005 notified by Govt of India which lay emphasis on grid connectivity of captive generators which is reproduced below:"</p> <p>"Under the Act, captive generators have access to licensees and would get access to consumers who are allowed open access. Grid inter-connection for captive generators shall be facilitated as per Section 30 of the Act. This should be done on priority basis to enable captive generation to become available as distributed generation along with the grid.</p>	<p>Supreme Court order dt. 29.11.2019, has empowered the State Regulatory Commissions, to levy the Grid Support charges. The same is also supported by various APTEL judgments (dt. 29.09.2015-Renuka Sugars v/s. GERC, PGVCL, Gujarat TRANSCO; dt. 18.02.2012-Chhattisgarh State Power Distribution v/s. Godawari Power &amp; Ispat Ltd) and SERC orders.</p> <p>Research paper on "Grid Support charges on Captive power plant", by K. Balaraman, Ananthapadmanabha, R. Nagraja, K. Parthasarthy; presented at IIT Madras – National Power System Conference 2004 also supports Technically the application of Grid Support Charges on Captive Power Plants.</p>
2	<p>It is further submitted that as per the Electricity Act 2003, the usage or grid support of the transmission or distribution network is possible only by way of open access as provided under Sections 39 and 42 of the above Act. As per the said provisions, the transmission and distribution licensee is only mandated to levy transmission/wheeling charges upon the Captive users, or any other open access consumers. It is further submitted that in the event of the CPPs sources power for their captive user industries by laying down their own dedicated transmission lines, as permitted under Section 9 of Electricity Act 2003, then even the aforesaid charges can not be levied.</p>	<p>In view of the additional benefits than the normal other consumers, the CPPs who intended to use and benefit from parallel operation need to compensate through Grid Support charges. The said Grid Support charges are also one of the components in Retail Supply Tariffs and these charges are proposed to levy on the CPPs who intended to use and benefit from parallel operation. Hence the proposal of Grid Support charges for FY 2022-23 are well within the provisions of Act.</p>
3	<p>The Transmission system of the Transco/ Discom should be so designed that it should take care of fluctuating load of the consumer as it is the duty of the transmission licensee under Section 40 of</p>	<p>The licensee has not denied CPPs access to the network, the captive generators who intended to use and benefit from parallel operation need to compensate through Grid Support charges.</p>

	Electricity Act, 2003. Moreover variation of load of a consumer having CGP is much less than a consumer without CGP.	
4	CGPs absorb some amount of harmonics whereas a consumer without CGP injects full quantum of harmonics generated to the grid.	A consumer with or without CGP could inject harmonics into the grid and this may affect the power quality of CGP but may never absorb the harmonics as it is producing power into the system. The harmonics would be mostly absorbed by the loads and can pollute the power quality of the system
5	The unbalanced voltage of the grid is a source of negative phase sequence current which is absorbed by the generators of CGP.	The voltage of the grid is never unbalanced and is maintained balanced as per IEEE standards
6	Fault level depends upon the generation capacity connected to the grid. Since the CGPs constitute 50% of capacity connected to the grid they are supposed to contribute to the increase in fault level of the grid, The parallel operation of CGPs with the grid is highly beneficial otherwise during a fault the grid voltage would have collapsed.	The faults are to be isolated within a short span, to safeguard the grid and high level protection systems are in use and to safeguard the grid connected elements.
7	As per Regulations of Supply Code, Industries having CGPs can draw emergency power up to the capacity of the largest generating unit by paying the required tariff. Therefore, it is not a support of the grid as claimed by the Petitioner. CPP's drawl of power is limited to "start-up power" when there is total loss of generation of the CPP. The drawl of power for production purposes, is limited to the CMD as per the Power Supply Agreement with the DISCOM. Otherwise penalty is attracted. Overdraw is prevented by proper setting of the relay at the Grid Sub-station.	
8	It is wrong to state that active and reactive power demand due to sudden and fluctuating load is not recorded in the meter. Billing is done for all consumers by integration over 15 minutes period and this is also applicable for CPPs which does not result in any undue advantage.	Such fault isolation techniques adopted by Grid are not dependent on the parallel operation with CGP

9	Due to injection of power by CGPs the load on the transformers in the grid reduces resulting in less transformer loss."	
10	The CGP are acting as distributed generator at the load center for which the transmission and distribution loss has been reduced to great extent. Further since all the cost of the transmission utility is being covered by the Commission while approval of Annual Revenue Requirement (ARR) of the utility there is no scope of levying such additional charges on the consumers. On the contrary to the claim of DISCOMS that the CGPs which are connected with the grid are getting benefits, we are facing lot of problems due to irregularities of-grid operation by TRANSCO.	
11	Transco being the State Transmission Utility (STU) has the responsibility to maintain the network system of the state as per Sec. 39 and 40 of Electricity Act, 2003. As per Regulation Grid Code, all the users or prospective users of STU are to be treated equal. Further Section 9 of Electricity Act, 2003 does not difference between CGP and IPP as far as grid connectivity is concerned and hence both should be treated equitably from the viewpoint of grid connectivity and support. Moreover industries owning arc furnaces and rolling mills but without CGPs creates much bigger problems and create pollutions in the state grid as compared to an industry having a CGP. The fluctuation in the load, generation of odd harmonics are technically issues which are common for industries with CPPs and without CPPs.	The grid support charges are not for drawl of power from the Distribution Licensee and for utilization of parallel operation benefits by captive generators.
12	As per Section 7 of the Electricity Act, 2003 any generating company may establish operate and maintain a generating station if it complies with State Grid Code and standards of grid connectivity as referred in v Section 73 (b) of the Act. Both Tariff Policy and National Electricity Policy emphasise the unhindered connectivity of CGPs to the grid.	

	Section 2(32) of the Electricity Act, 2003 defines Grid means the high voltage backbone system of interconnected transmission lines, substation and generating plants. That implies CPPs and Generator are part and parcel of the grid system. Therefore it is not understood how one part of the grid is asking Support Charges to other part. Under such condition of dynamism all the constituency of the integrated Grid system are mutually benefitted as well as become victims of the vagaries created. Thus the very concept of levying Grid support charges to Captive Generating Plant only seems to be absurd.	
13	TSDISCOM/TSTRANSCO cannot levy Grid Support Charges to stand alone CPP like In the other hand TRANSCO is enjoying various advantages of grid support from CPPs by way of utilizing surplus power from CPPs in a power deficit situation, receiving VAR support and fault MVA support for the grid.	High power industries with fluctuating loads are to be stabilised to safeguard the grid, from blackout. The demand put on the system is to be considered average value and the integration period of 15 mins is considered to avoid maximum no. of fluctuation to safeguard the grid.
14	There is no provision in the statute empowers the DISCOMS to levy Grid Support Charges on the CPPs. They, on the other hand as CPPs absorbed some amount of harmonics. On the contrary consumer without CGPs transmit full quantum of harmonics to the grid. The DISCOMs/TRANSCO is not taking any step to install suitable equipment to filter the harmonics and injecting those pollutants to the grid for which the CPPs are 'forced to suffer. The grid voltage is always unbalanced due to various categories of consumers and hence is a source of negative phase sequence current which cause stress on the generators of CPPs. Transco being the STU of Telangana should find some means to prevent the same."	However, there is a proposal for amendment from CEA to reduce the indication period further to 5 mins to enhance the grid stability. Whether it is a generator or a consumer has to comply with the grid standards.
15	It is relevant to mention the observation and comments of The Hon'ble Orissa Electricity Regulatory Commission in the similar matter, in its Order dated 31.03.2014 in Case No. 46/2012, the excerpt of which is as follows:	An in-house CGP producing power will be drawn by the loads within the premises. In such cases if the load is more than the CGP the balance power would be drawn from the Utility's grid. They would have the Contract for the balance load from the utility.

i) Para- 15 of Order:

"We heard the parties at length and also perused the technical report submitted by OPTCL. The present installed capacity of the CGPs in the State as submitted by OPTCL is 5173 MW which is more than or equal to capacity of other generators connected to Odisha Grid including Odisha share of power from Central Generation Stations. We agree with the contention of CCPPO that the pollutants of the Grid like fluctuations in frequency and voltage, negative phase sequence, distortion due to harmonics etc. are the resultant effect of all synchronous machines like generators and motors of the Grid system. These pollutants are injected in to the grid not only by CGPs but also by other independent generators and machines like motors and arc furnaces of the consumers. Holding industry having CGPs only responsible for this is not correct"

ii) Para-16 of Order:

"After going through the submission of various stake holders of the grid system we conclude that the behaviour of industries having CGPs and also without CGPs varies case to case basis. There are ample provisions in the Odisha Grid Code to regulate the behavior of entities connected to the OPTCL system. Hence, a generic method of calculation of Grid Support Charges for all industries may not be proper. The Petitioner has failed to submit a State-wide study before us on which a decision could have been taken. One solution fits all can't be applicable here. So implementation of a mode/ of another State in our State will not be proper."

iii) Para- 17 of Order:

There are enough provisions in Odisha Grid Code, 2006 to maintain quality supply in the grid system. Regulation 4.7 of Odisha Grid Code discuss elaborately the idea/ behaviour of constituents of the Grid.



	OPTCL should play the role of watchdog and analyze the pollutant injected by various constituents of the grid system. CGPs and industries injecting pollution should be directed to take up remedial measures like installation of capacitors, filters for harmonics, etc. so that grid pollution will be minimized. The non-compliance by any industry or industry having CGP of the Grid Code should be dealt as per Regulation 1.18 of OGC, 2006. Therefore, the prayer of OPTCL for levy of Grid Support Charges is not acceptable."	
16	Just as in the case of APERC Original proposal when GSC was proposed at 50% of the then applicable Demand Charge of Rs 170 per KVA during the year 2002, the current proposal of 50% of the Demand Charge of Rs 475 per KVA per month is also not supported by any data proving that the grid suffered to this extent in providing parallel operations to CPPs.	
17	Further, the Original proposal when GSC was proposed by APERC during the Y 1999/2002/ the Electricity Act is in force from 2003 and Section 9 of Electricity Act does not differentiate between GGP and IPP as far as grid connectivity is concerned and hence both should be treated equitably from the viewpoint of grid connectivity and support.	If it is not in house CGP, and CGP is located at some other location and drawal point at other end, the total power for the load would be drawn from the utility grid only. In such a scenario transformer losses will still be incurred by the utility.
18	CPPs involve heavy capital, investments and are necessitated to provide fillip to the main consumption industry utilizing captive power at reasonable rate as opposed to fluctuating and ever increasing grid tariff.	TS Discoms wants to state that the UI charges are levied to the tune up to ~12% of the deviation charges in the case where a Generator or a Discoms deviates from their said drawal or injection schedule.
19	The proposed levy of GSC aims to stifle the consuming industries by this arbitrary levy, which in turn erodes the viability of the principal industry to a point that it must perform cease operations.	However, if the same generator or to be particular a captive power plant deviates from its said injection schedule say up to a quantum of more than 12% then this level of deviation is absorbed by the Grid. In this case Grid

20	The CPPs who are predominantly coal-fired, are already subjected to substantial increases in coal cost being supplied by the State mining companies and have no window to absorb such high levies such as the proposed GSC.	acts as a stabilizer. Thus UI charges amount for only a fraction of the quantum of deviation, whereas Grid support charges help to further develop the grid to absorb the rest of deviations.				
21	CPPs have repeatedly expressed their willingness to provide additional protections in their facilities as desired by the grid to see that no untoward load throwbacks or fault currents or reactive power surges happen.	A consumer with or without CGP could inject harmonics into the grid and this may affect the power quality of CGP but may never absorb the Harmonics as it is producing power into the system. The harmonics would be mostly absorbed by the loads and can pollute the power quality of the system				
22	The original levy of GSC in 1999 was when the generation shortfall was prevailing, the TSDISCOMS were going through occasional R&C periods and frequency fluctuations, etc. when the Regulator considered that the proposed levy had merits. However, the TS Grid has since improved / made many strides in Grid size, availability of power and attained stability and is one of the few Grids in the country being engaged in export of power on a steady basis.	TS Discoms want to state that there is a clear difference between a Captive power plant and the other Generators. The Captive power plants supply power to their own needs and balance / deficit power can be drawn/injected back into the grid. However other Generators can supply a constant required amount of power into the grid; thus support the stability of the Grid.				
23	The Grid situation therefore requires to be thoroughly reviewed with reference to the fact whether the Grid suffers any forbearance in providing parallel operations of CPPs. CPPs request that such a review be conducted on an arms-length basis by an independent third party, taking into account the actual power harmonics, fault currents or load throwbacks as claimed by TSDISCOMS and also to arrive at a justifiable and reasonable charge based on actual cost / damage suffered by the Grid, if any, in providing such parallel operations to CPPs.					
24	<p>The prevailing parallel operation charge which is equivalent to the proposed GSC in other States is as follows:</p> <table border="1" data-bbox="199 1360 951 1438"> <thead> <tr> <th data-bbox="199 1360 382 1398">Name of the State</th> <th data-bbox="382 1360 951 1398">Grid Support Charges Rs/KVA/Month</th> </tr> </thead> <tbody> <tr> <td data-bbox="199 1398 382 1438">Madhya Pradesh</td> <td data-bbox="382 1398 951 1438">Rs.20/KVA/Month</td> </tr> </tbody> </table>	Name of the State	Grid Support Charges Rs/KVA/Month	Madhya Pradesh	Rs.20/KVA/Month	The mutual benefit of the Grid is mostly applicable for captive power plants. The grid support charges are not for drawl of power from the
Name of the State	Grid Support Charges Rs/KVA/Month					
Madhya Pradesh	Rs.20/KVA/Month					

	<table border="1"> <tr> <td>RERC</td> <td>Rs.20/KvA/Month</td> </tr> <tr> <td>Gujarat</td> <td>Rs.26/KVA/Month</td> </tr> <tr> <td>Tamilnadu</td> <td>Rs.30/KVA/Month</td> </tr> <tr> <td></td> <td>Rs. 16/- per kVA per month on the installed ca acit of the CPP</td> </tr> <tr> <td>Odisha</td> <td>Nil</td> </tr> <tr> <td>Vilest Bengal</td> <td>Nil</td> </tr> <tr> <td>Kerala</td> <td>Nil</td> </tr> <tr> <td>Karnataka</td> <td>Nil</td> </tr> </table> <p>The above utilities have proposed these rates after third party analysis. From the above table it can be seen that the parallel operation charge or GSC in other States has been worked out based on clear parameters of the costs incurred by the Grid and so are considered reasonable as against the proposed levy of 50% of the Demand Charge of Rs 475per KVA per month, proposed by TSDiscoms. The proposed levy has no basis and is grossly excessive, arbitrary, and so requires to be reduced substantially and validated by an independent third-party analysis.</p>	RERC	Rs.20/KvA/Month	Gujarat	Rs.26/KVA/Month	Tamilnadu	Rs.30/KVA/Month		Rs. 16/- per kVA per month on the installed ca acit of the CPP	Odisha	Nil	Vilest Bengal	Nil	Kerala	Nil	Karnataka	Nil	Distribution Licensee and for utilization of parallel operation benefits by captive generators.
RERC	Rs.20/KvA/Month																	
Gujarat	Rs.26/KVA/Month																	
Tamilnadu	Rs.30/KVA/Month																	
	Rs. 16/- per kVA per month on the installed ca acit of the CPP																	
Odisha	Nil																	
Vilest Bengal	Nil																	
Kerala	Nil																	
Karnataka	Nil																	
25	<p>What is the basis and methodology adopted while arriving GSC 50% of demand charges? How the DISCOM arrived GSC 50% of demand charges and why can't it 2% or 5%? g In ARRI TS DISCOMs haven't mentioned any basis /justification while proposing the GSC. If we consider the proposed GSC, a captive power plant having installed capacity of 100 MVV, is needed to pay GSC Rss 297 Crores per month and Rss 35.63 Crores per annum, results closure of Industries in Telangana.</p>	TS Discoms wants to state that the UI charges are levied to the tune up to ~12% of the deviation charges in the case where a Generator or a Discoms deviates from their said drawl or injection schedule.																
26	<p>Most of the CPPs installed capacities are much higher when compared to their captive load, When the installed capacity / operating capacity of captive load is much lower than installed Capacity of Power plant, it is very unfair to impose GSC based on the installed capacity of CPP*</p>																	

27	<p>The proposed levy of GSC at such a high rate will be a death knell for large process industries which depend upon captive power at reasonable cost. The proposed GSC will hit at the core viability of the principal industry resulting in closure of operations and in loss of direct and indirect employment aside from loss of revenue to the exchequer.</p>	<p>However, if the same generator or to be particular a captive power plant deviates from its said injection schedule say up to a quantum of more than 12% then this level of deviation is absorbed by the Grid. In this case Grid acts as a stabilizer. Thus UI charges amount for only a fraction of the quantum of deviation, whereas Grid support charges help to further develop the grid to absorb the rest of deviations.</p>
28	<p>We object the proposed levy on Captive Power Plants (CPPs) inter a/ia alleging that the levy was devoid of merits, excessive; that there was no evidence of actual forbearance / costs /damages on the part of thegrid on account of CPPs running parallel operation and if at all, it was only for export of surplus power from CPPs. We also claim that we have adequate protections against any power load throwback within the permitted time intervals under the grid code and accordingly refuted the claim of TS DISCOMS as being without merits.</p>	

**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by Sri Rajesh Garg (Plant Head, Kesoram Cement), Unit: Basanthbagar, Works Post: Basanthnagar - 5050187, Dist: Peddapally**

S.No	Summary of Objections / Suggestions	Response of the Licensee
1	<p>The proposed levy of grid support charges by TSNPDCL for parallel operation with the grid is arbitrary and punitive in nature. Just for the sake of having a facility to parallel our captive power plant supply with grid that too used for the startup and maintenance power requirement of the CPP.</p>	<p>The followings are benifited by the CPP in view of parallel operation with the grid.</p> <ul style="list-style-type: none"> <li>● The fluctuations in the load are absorbed by the utility grid in the parallel operation mode. This will reduce the stresses on the captive generator and equipment.</li> <li>● Fluctuating loads of the industries connected in parallel with the grid inject harmonics into the grid. The current harmonics absorbed by the utility grid is much more than that by the CPP generator. These harmonics flowing in the grid system are harmful to the equipment and are also responsible for polluting the power quality of the system.</li> <li>● Negative phase sequence current is generated by unbalance loads. The magnitude of negative phase sequence current is much higher at the point of common coupling than at the generator output terminal. This unbalanced current normally creates a problem of overheating of the generators and other equipment of CPP, if not running in parallel with the grid. When they are connected to the grid, the negative phase sequence current flows into the grid and reduces stress on the captive generator.</li> <li>● Captive power plants have higher fault level support when they are running in parallel with the grid supply. Because of the higher fault level, the voltage drop at the load terminal is less when connected with the grid.</li> <li>● In case of faults in a CPP generating unit or other equipment, bulk consumers can draw the required power from the grid and can save their production loss.</li> <li>● The grid provides stability to the plant to start heavy loads like HT motors.</li> </ul>

		<ul style="list-style-type: none"> <li>• The variation in the voltage and frequency at the time of starting large motors and heavy loads, is minimized in the industry, as the grid supply acts as an infinite bus. The active and reactive power demand due to sudden and fluctuating load is not recorded in the meter.</li> <li>• The impact created by sudden load throw off and consequent tripping of CPP generators on over speeding is avoided with the grid taking care of the impact.</li> </ul> <p>The above benefits extended by the licensee to the CPP consumers, it has to be charged to the consumers who utilize the grid support. Hence, the licensee has proposed the levy of grid support charges duly adopting the methodology approved in the APERC order 08.02.2002 and subsequently upheld by Supreme Court via judgment dated 29.11.2019.</p>
2	<p>As per our case, to operate total cement plant we require total power around 20.0 MW, we are having captive power plant capacity is 15.7 MW and Grid Contract Maximum Demand is 5.2 MVA. During peak cement market condition, we run total cement plant then we import power from Grid and during down market conditions we will kept as stand by condition.</p>	<p>As per the proposed grid charges conditions, the grid support charges will not be levied on the entire capacity of CPP and it will be levied only on differential capacity between CPP capacity and CMD with Distribution Licensee.</p>
3	<p>We will operate parallel only during power plant shut down/break down i.e. during the startup and stop of Captive power plant which will be synchronize hardly twice or thrice per year. If we will calculate the GSC as per proposed tariff, we get additional burden @ 34.25 Lacks per month and 4.11 Cr. per annum for only parallel operation twice or thrice per year.</p>	<p>The benefits of the parallel operation with the grid are enjoyed by the CPP throughout the year. However, if the parallel operation is required twice or thrice per year, the system is kept ready for the thought out the year to serve the parallel operation for their CPP capacity as and when required. Hence grid support charges are to be paid as per proposals made in the ARR &amp; Tariff filing for FY 2022-23.</p> <p>The calculations made by the objector in respect of grid support charges are calculated on the entire capacity of the CPP which is not correct. The grid support charges shall be levied on differential capacity between CPP capacity and CMD with Distribution Licensee.</p> <p>Grid Support charges computation example:</p>

		<p>Captive Capacity = 100 MVA = 100,000 kKVA .....[a]  CMD with Distribution licensee = 90 MVA = 90,000 KVA.....[b]</p> <p>Differential capacity = [a-b] = 10 MVA = 10,000 kVA ....[c]  GSC (Rs. Cr.) = c * 50% of Demand charges  = 10000 * (50% of say Rs. 475) / 10<sup>7</sup>  = Rs. 0.2375 Cr./ month</p>				
4	Captive generation was insisted by the APSEB to meet the power shortage and thus the captive power plant were a creation of the APSEB only. Substantive investments were made by the industry on captive generation, which is not a profit center for the industry.	The industries benefited from the aforesaid advantages of parallel operation with the grid.				
5	Most of the industries do not resort to continuous parallel operation and parallel operation is resorted to when absolutely necessary. TSNPDCL has not incurred any additional cost to provide the parallel operation facility. The levy of grid support charges is not supported by any basis of costs incurred or pecuniary loss suffered by TSDISCOM.	The aforesaid advantages of parallel operation with the grid are benefited by the CPPs in addition to other facilities of other industries. In view of the additional benefits than the normal other industries or others, the CPPs who intend to use and benefit from parallel operation need to compensate through Grid Support charges.				
6	Though CPPs do not contend the levy GSC in compliance with the orders of Hon'ble Supreme Court, the quantum of the proposed levy of 50% of Demand Charge of Rs. 475 per KVA per month is grossly excessive, arbitrary, and abusive of the statutory authority also not supported by any data proving that the grid suffered to this extent in providing parallel operations to CPP and is not supported by actual costs or damages suffered by the Grid.	The Hon'ble Supreme court in its order on Determination of Grid support charges dated 29.11.2019 upheld the Hon'ble APERC's order quoted above concerning Grid support charges. The licensee has proposed the same grid support charges methodology approved in APERC order dated 08.02.2002 which is upheld by the Hon'ble Supreme court of India. The proposed grid support charges shall be levied on differential capacity only i.e., difference between CPP capacity and CMD with Distribution Licensee. Whereas in other states, these grid support charges are calculated in entire capacity of Captive Power Plant (CPP). Moreover, if the CMD with licensee is more than or equal to capacity of CPP, there will not be levied any grid support charges to such consumer. Grid Support charges computation example: Captive Capacity = 100 MVA = 100,000 kVA .....[a] CMD with Distribution licensee = 90 MVA = 90,000 kVA.....[b]				
7	<p>The prevailing parallel operation charge which is equivalent to the proposed GSC in other States is as follows:</p> <table border="1"> <thead> <tr> <th>Name of the State</th> <th>Grid Support Charges Rs/KVA/Month</th> </tr> </thead> <tbody> <tr> <td>Madhya Pradesh</td> <td>Rs.20/KVA/Month</td> </tr> </tbody> </table>	Name of the State	Grid Support Charges Rs/KVA/Month	Madhya Pradesh	Rs.20/KVA/Month	
Name of the State	Grid Support Charges Rs/KVA/Month					
Madhya Pradesh	Rs.20/KVA/Month					

	Chattisgarh	Rs.21/KVA/Month		<p>Differential capacity = [a-b] = 10 MVA = 10,000 kVA ....[c]  GSC (Rs. Cr.) = c * 50% of Demand charges  = 10000 * (50% of say Rs. 475) / 10<sup>7</sup>  = Rs. 0.2375 Cr./ month</p> <p>Comparison of GSC with other states like Madhya Pradesh, Gujarat, Tamil Nadu, Chhattisgarh</p> <p>Consider GSC @ Rs. 25 / kVA / month  Captive Capacity = 100 MVA = 100,000 KVA  GSC (Rs. Cr.) = 25 * 100000 / 10<sup>7</sup>  = Rs. 0.25 Cr. / month</p> <p>Thus GSC determined by TS Discoms is very much justifiable.</p>
	Gujarat	Rs.26/KVA/Month		
	Tamilnadu	Rs.30/KVA/Month		
	J & K	Rs.16/KVA/Month on the installed capacity of the CPP		
	Odisha	Nil		
	West Bengal	Nil		
	Kerala	Nil		
	Karnataka	Nil		
	<p>The above utilities have proposed these rates after third party analysis. It is evident from the above table that the burden imposed by the proposed grid support charges in telangana has no basis and is unduly, grossly excessive high compared to what would have been payable above states and analysis to be done by third party. It is therefore submitted that the proposed grid support charges is entirely unreasonable and unjustified.</p>			
8	<p>From the above table it can be seen that the parallel operation charge or GSC in other States has been worked out based on clear parameters of the costs incurred by the Grid and so are considered reasonable as against the proposed levy of 50% of the Demand Charge of Rs 475 per KVA per month, proposed by TSNPDCL The proposed levy has no basis and is grossly excessive, arbitrary, and so requires to be reduced substantially and validated by an independent third-party analysis.</p>			
9	<p>The effect of the grid support is different to in different classes of consumers like industries with continuous parallel operation and</p>			<p>The proposed grid support charges are 50% of prevailing demand charges for HT consumers on the differential capacity here the HT consumer is the respective consumer category only. Hence proposed grid support charges</p>



	standby permission. Whether uniform grid support charges are to be levied on all consumers is a point for discussion.	are different from one category of consumers to another category of consumers.
10	The proposed levy of GSC at such a high rate will be a death knell for large process industries which depend upon captive power at reasonable cost. The proposed GSC will hit at the core viability of the principal industry resulting in closure of operations and in loss of direct and indirect employment aside from loss of revenue to the exchequer.	The proposed grid support charges are very negligible per unit in respect of generation of captive power plants. However, if the Captive Plant Capacity is less than or equal to contracted maximum demand with licensee, such captive power plant capacity will not attract grid support charges.
11	For the reasons stated herein-above, may be pleased to reject the levy of grid support charges for parallel operation during CPP startup & Stop Conditions.	The benefits extended by the licensee to the CPP consumers, it has to be charged to the consumers who utilize the grid support. Hence, the licensee has proposed the levy of grid support charges duly adopting the methodology approved in the APERC order 08.02.2002 and subsequently upheld by Supreme Court via judgment dated 29.11.2019. The licensee earnestly requests the Hon'ble Commission to approve the proposed Grid Support Charges.

**Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2022-23 by Sri S.Nagarjuna Reddy, (Commercials & Regulatory) Mytrah Energy (India) Pvt Ltd, #8001,Q-City,S.No:109, Gachibowli, Hyderabad**

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p><b>Solar Generation:</b> TS Discoms have considered the NCE generation Solar in the power purchase cost. NCE generation = Solar 1644.26 MUS, Tariff = Rs 5.69/kWh.</p> <p><b>Comment:</b></p> <ul style="list-style-type: none"> <li>o It is observed that DISCOMs has considered 21% CUF for Solar Generators in their ARR proposal, However DISCOMs should consider the total energy delivered at interconnection point and also to pay the payments towards total energy delivered as per PPA terms. On this premise of considering lower generation from NCE (Solar), DISCOMs shouldn't Curtail the power from RE generations as they have to comply the MUST RUN status in accordance to the IEGC GRID code 2010.</li> </ul> <p><b>Request to Hon'ble TSERC:</b></p> <ul style="list-style-type: none"> <li>o It is requested to issue necessary directions to TS Discoms in following the Grid Code and Must run status accorded to NCE projects.</li> </ul>	<p>In respect of NCE projects, the historical actual generation data of the generators are being taken as basis for preparation of ARR proposals. However, payments for the proposed generation particulars are subject to terms and conditions of respective Power Purchase Agreements (PPAs) which are in turn governed by respective Commission orders determining tariff for such NCE Projects. TSDISCOMs honour the MUST RUN status awarded to the RE generators in accordance with the IEGC Grid Code. However can proceed to curtail energy from these projects as per clause 5.2 (u) of the Grid Code in case of Grid security.</p>
2	<p><b>Measures to Reduce Aggregate Technical Loss</b></p> <ul style="list-style-type: none"> <li>o As per the proposed ARR fillings for FY-2022-2023, Distribution losses are targeted to decrease from 9.13% in FY 2020-21 to 6.99% in FY 2022-23 by conducting 11 kv feeder wise energy audits, installation of additional capacitor banks etc thereby decreasing the power purchase cost.</li> </ul> <p><b>Comment:</b></p> <ul style="list-style-type: none"> <li>o From the proposal, we understand that Discoms are making their efforts to improve their balance sheet and make themselves a self-reliant cash rich DISCOM.</li> </ul> <p><b>Request to Hon'ble TSERC:</b></p> <ul style="list-style-type: none"> <li>o Accordingly, we request TSERC to direct the DISCOMs to pass on the savings generated through reduction in Technical losses towards reducing the average payables to generators</li> </ul>	<p>TS Discoms state that they have always tried their best to pay the dues to the generators in a timely manner. Payments timelines to the Generators would definitely improve if the financial conditions of the Discoms are improved.</p> <p>TS Discoms will continue to put its best efforts in improving its operational efficiency and utilise the same in their timely payments to its Gencos.</p>
3	<p><b>Tariff Hike</b></p> <ul style="list-style-type: none"> <li>o From the ARR filings for FY 2022-23 Discoms have proposed a tariff hike in fixed and energy charges including customer charges. Fixed charges increased by Rs 100/kVA for industrial customer and energy charges of 50 paisa for all domestic consumers and</li> </ul>	<p>TS Discoms shall abide by the directions given by the Hon'ble Commission</p> <p>Further, TS Discoms shall abide by the directions given by the Hon'ble Commission.</p>

	<p>1 rupee for all industrial consumers resulting in overall increase of thereby expecting an increase of Rs 6,830 crores for a year.</p> <p><b>Request to Hon'ble TSERC:</b></p> <ul style="list-style-type: none"> <li>o This is a welcome step by the DISCOMs and the revenues generated by the tariff hike should be effectively used in repaying the energy bills to the generators timely.</li> </ul>	
4	<p><b>Late Payment Surcharge (LPS) on Delayed payments:</b></p> <ul style="list-style-type: none"> <li>o From the proposed ARR for the FY 2022-23, it is observed that Discoms have not considered the cost for Late payment surcharge against the Energy bill's.</li> </ul> <p><b>Comment:</b></p> <ul style="list-style-type: none"> <li>o As per the terms of PPA, in case of delayed payments beyond due date, the generators are entitled to interest on delayed payments at rates specified in PPA. The average receivable period is ranging anywhere between 6 to 12 months as seen from payment history by TS Discoms to wind and solar projects and Discoms are unilaterally waiving off the late payment surcharge which is otherwise payable to wind &amp; solar projects as per PPA. Therefore, Discoms should consider the cost equivalent to Late payment Surcharge (LPS) for a period of 06 months on delayed payments in their ARR proposal for FY 202223 which enables Discoms to pay LPS as per the terms of PPA. By adoption of any efficiency measures, if Discoms could reduce the average payable period to generators, LPS amount filed/claimed under ARR could be used to set off in future.</li> </ul> <p><b>Request to Hon 'ble TSERC:</b></p> <ul style="list-style-type: none"> <li>o Non- Allocation of funds in the ARR would lead to unavailability of funds to clear the past due's which would have a cascading effect on the generator financial situation.</li> <li>o Therefore, we request Hon'ble TSERC to issue directions to DISCOMs to consider the Late payment Surcharge for a delay period of 06 months in their ARR proposal instead of filling True-Up petitions and considering the Time value of Money.</li> </ul>	<p>Hon'ble TSERC does not allow the Late Payment Surcharge (LPS) on Delayed Payments against the Energy Bills of the generators in ARR Filings for Retail Supply Tariff.</p>

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల శ్రీ సారంపత్రి మల్లారెడ్డి, ఉపాధ్యక్షులు, అఖిల భారత కిసాన్ సభ, ఇం.నెం.1-1-60/2, ఆర్డీసీ క్రాస్ రోడ్, ముషీరాబాదు, హైదరాబాద్ - 20 గారి సూచనలు/సలహాలకు సమాదానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు																	
1.	<p><b>టారిఫ్ పెంచడం :</b></p> <p>1. యాన్యుల్ రెవెన్యూ రిక్విర్ మెంట్ కు సంబంధించిన వినియోగదారుల పై రూ.6,830.90 కోట్లు భారాలు వేయడమేగాక లోటు రూ.4,097.23 కోట్లు చూపారు. రాష్ట్ర ప్రభుత్వం రూ.5,651.65 కోట్లు సబ్సిడీ ఇచ్చినప్పటికీ లోటును చూపడం, ఆ లోటును ఎలా భర్తీ చేస్తారో చెప్పలేదు.</p> <table border="1" data-bbox="315 534 1128 699"> <thead> <tr> <th>డిస్కంలు</th> <th>ప్రభుత్వ సబ్సిడీ</th> <th>టారిఫ్ పెంచడం</th> <th>లోటు</th> </tr> </thead> <tbody> <tr> <td>దక్షిణ</td> <td>4,254.15</td> <td>5,044.27</td> <td>2,686.79</td> </tr> <tr> <td>ఉత్తర</td> <td>1,397.50</td> <td>1,786.63</td> <td>1,410.44</td> </tr> <tr> <td><b>మొత్తం</b></td> <td><b>5,651.65</b></td> <td><b>6,830.90</b></td> <td><b>4,097.23</b></td> </tr> </tbody> </table> <p>ఈ లోటును భర్తీ చేయడానికి ఎలాంటి టారిఫ్ పెంచడంగానీ, అంతర్గత సామర్థ్యం పెంచుకోవడం ద్వారా గానీ పూర్తి చేసుకునేటట్లు ఎలాంటి ప్రతిపాదన డిస్కంలు చేయలేదు. అనగా ఈ లోటును కొంత కాలం తరువాత మళ్ళీ వినియోగదారుల పై వేసే అవకాశం ఉంది.</p>	డిస్కంలు	ప్రభుత్వ సబ్సిడీ	టారిఫ్ పెంచడం	లోటు	దక్షిణ	4,254.15	5,044.27	2,686.79	ఉత్తర	1,397.50	1,786.63	1,410.44	<b>మొత్తం</b>	<b>5,651.65</b>	<b>6,830.90</b>	<b>4,097.23</b>	<p>గౌరవ కమీషన్ వారు జారీ చేసిన ఆర్థిక సంవత్సరం 2018-19 టారిఫ్ ఆర్డర్ ప్రకారం తెలంగాణ రాష్ట్ర ప్రభుత్వం వారి సబ్సిడీ మరియు ధరల పెంపు ప్రతిపాదన ద్వారా అంచనా వేసిన అదనపు ఆదాయం తరువాత NPDCL లోటు రూ.1,410 కోట్లుగా. 2022-23 సంవత్సరానికి అంచనా వేయడమైనది. ఈ లోటును డిస్కం అంతర్గత సామర్థ్యం మరియు అదనపు ప్రభుత్వ సహాయం ద్వారా భర్తీ చేసుకోవడం జరుగుతుంది.</p> <p>ఈ విషయము పై గౌరవ కమీషన్ వారు అంతిమంగా నిర్ణయం తీసుకుంటారు.</p>
డిస్కంలు	ప్రభుత్వ సబ్సిడీ	టారిఫ్ పెంచడం	లోటు															
దక్షిణ	4,254.15	5,044.27	2,686.79															
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2.	<p><b>2018-19 నుండి 2021-22 వరకు లోటును ఎలా భర్తీ చేస్తారు</b></p> <p>గత 4 సంవత్సరాలుగా డిస్కామ్లు రెగ్యులేటరీ కమీషన్ కు ఎలాంటి టారిఫ్ ప్రొపోజల్స్ ఇవ్వలేదు. ఆ సంవత్సరాలలో వచ్చిన లోటును విడిగా చూపారు. ఆ లోటును ఎలా భర్తీ చేస్తారో, ఎలాంటి ప్రతిపాదన చేయలేదు. టారిఫ్ లను చట్ట ప్రకారం నవంబర్ లో కమీషన్ కు డిస్కామ్లు ప్రతిపాదించాలి ఫిబ్రవరి లో బహిరంగ విచారణ జరిపి కమీషన్ టారిఫ్ లు నిర్ణయించాలి. ప్రభుత్వ ఒత్తిడి ద్వారా గత 4 సంవత్సరాలుగా ఎఆర్ఆర్ లు ఇవ్వలేకపోవడం చట్టాన్ని దిక్కరించినట్లు అయ్యింది. దీనికి బాధ్యులు ఎవరు? రెగ్యులేటరీ కమీషన్ డిస్కామ్ల పై ఎలాంటి చర్యలు తీసుకుంది. గత 4 సంవత్సరాల లోటు ఈ విధంగా ఉంది (కోట్లలో)</p> <table border="1" data-bbox="427 1252 947 1407"> <tbody> <tr> <td>2018-19</td> <td>10,232.74</td> </tr> <tr> <td>2019-20</td> <td>7,317.29</td> </tr> <tr> <td>2020-21</td> <td>8,666.76</td> </tr> <tr> <td>2021-22</td> <td>10,624.84</td> </tr> <tr> <td><b>మొత్తం</b></td> <td><b>36,841.63</b></td> </tr> </tbody> </table> <p>ఇంట లోటును డిస్కామ్లు పూరించడానికి ఎలాంటి ప్రతిపాదనలు</p>	2018-19	10,232.74	2019-20	7,317.29	2020-21	8,666.76	2021-22	10,624.84	<b>మొత్తం</b>	<b>36,841.63</b>	<p>డిస్కంలు ఆర్థిక సంవత్సరం 2018-19 వరకు ప్రతి సంవత్సరం సమగ్ర ఆదాయ ఆవశ్యకత నివేదికలను సమర్పించడం జరిగినది. కానీ ఆర్థిక సంవత్సరం 2019-20 నుండి ఆర్థిక సంవత్సరం 2021-22 సంవత్సరాలకు సంబంధించిన సమగ్ర ఆదాయ ఆవశ్యకత మరియు ప్రతిపాదిత ధరల నివేదికలను తెలంగాణ అసెంబ్లీ ఎన్నికలు 2018 నియమావళి, లోక సభ ఎన్నికలు 2019 నియమావళి, ICAD నుండి LIS సమాచార జాప్యం వలన, వార్షిక ఖాతాలు (Annual Accounts) సకాలంలో పూర్తి చేయక పోవడం వలన, మున్సిపల్ ఎన్నికల నియమావళి వలన, కేంద్ర విద్యుత్ మంత్రిత్వ శాఖ వారి ధరల హేతుబద్ధీకరణ చేయడానికి, కోవిడ్-19 లాక్-డౌన్ వలన మరియు GHMC ఎన్నికల నియమావళి వలన సకాలంలో సమగ్ర ఆదాయ ఆవశ్యకత నివేదికలను సమర్పించ లేదు.</p> <p>ఏది ఏమైనప్పటికీ 31.05.2021 రోజున ఆర్థిక సంవత్సరం 2019-20 నుండి ఆర్థిక సంవత్సరం 2021-22 వరకు 3 సంవసరాల సమగ్ర ఆదాయ ఆవశ్యకత నివేదికలను గౌరవ కమీషన్ వారికి సమర్పించడం జరిగినది. కానీ ప్రతిపాదిత ధరల నివేదికలను సమర్పించని కారణంగా నివేదికలను గౌరవ కమీషన్ వారు తిరస్కరించారు.</p> <p>తెలంగాణ డిస్కంలు పంపిణీ సరఫరా వ్యాపారం ట్రూ-అప్ (1వ, 2వ &amp;</p>						
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క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	
	<p>చేయకపోవడం ఆశ్చర్యకరం. ఇది కాకుండా 2022-23 సంవత్సరానికి కూడా లోటు 4,097.23 కోట్లు కూడా చూపారు. డిస్కామ్ను ఇంత లోటుతో ఎలా పని చేస్తున్నాయి. ఈ భారాలన్నీ వినియోగదారుల పై ఒకేసారి వేసే పరిస్థితి ఎలా ఉంటుందో ఊహించగలమా?</p>	<p>3వ)లను మరియు వార్షిక పనితీరు సమీక్ష (Annual Performance Review) ఆర్థిక సంవత్సరం 2019-20 మరియు 2020-21 సంవత్సరాలకుగాను గౌరవ కమీషన్ వారికి సమర్పించడం జరిగినది మరియు రిటైల్ సరఫరా వ్యాపారం యొక్క ట్రూ-అప్ ఆర్థిక సంవత్సరం 2016-17 నుండి ఆర్థిక సంవత్సరం 2018-19 వరకు తయారు చేసినాము మరియు ఆర్థిక సంవత్సరం 2019-20 నుండి ఆర్థిక సంవత్సరం 2020-21 వరకు తయారు చేస్తున్నాము దీనిని కూడా త్వరలో గౌరవ కమీషన్ వారికి సమర్పించడం జరుగుతుంది.</p>
3.	<p><b>డిస్కామ్ చట్ట ఉల్లంఘన:</b> సకాలంలో ఎఆర్ఆర్ లు వేయకపోగా, కనీసం లోటును భర్తీ చేయడానికి కూడా ప్రతిపాదనలు చేయకపోవడం వినియోగదారులను భ్రమలకు గురి చేయడం లేదా మోసగించడానికి ప్రయత్నించడమే తప్ప మరొకటి కాదు. ఉదయ్ పథకం అమలు తీరును కూడా ప్రస్తావించలేదు. దీని పై ప్రభుత్వ ఒత్తిడి ఏమిటి? విద్యుత్ శాఖ మంత్రి ఏమి చేస్తున్నాడు? ఎఆర్ఆర్ లను ఎన్నికలకు ముడిపెట్టి వాయిదా వేశారా? విద్యుత్ చట్టం ఎందుకు అమలు జరగడం లేదు? 4 సంవత్సరాల తరువాత ఇప్పుడు ఎఆర్ఆర్ రెగ్యులేటరీ కమీషన్ కు ఇవ్వాలిన్న వసరం ఏమి వచ్చింది?</p>	<p>సకాలంలో ARRలు సమర్పించక పోవడానికి మరియు మిగిలిన లోటును ఎలా భర్తీ చేయగలరు అనే విషయాలు పైన పేర్కొన్న (1) &amp; (2) పేరాలలో చెప్పడం జరిగినది.</p>
4.	<p><b>టారిఫ్ రేట్ల పెంపుదల :</b> డొమెస్టిక్ 1 క్యాటగిరీకి రూ.1.45 పైసల నుండి రూ.1.95 కు పెంచారు. పెంపుదల 30 శాతం పైనా ఉంది. 2వ క్యాటగిరీ రూ.2.60 నుండి రూ.3.10 రూపాయలకు పెంచారు. ఇది 13 శాతానికి పరిమితం అయ్యింది. అన్ని ఎల్.టి క్యాటగిరీలకు 50 పైసలు, హెచ్.టి క్యాటగిరీలకు 1 రూపాయి చొప్పున గూడు గుత్తాగా పెంచారు. డొమెస్టిక్ ఎల్.టి. 1కు పడిన భారం మిగిలిన వాటికి నిర్ణయించలేదు. శాస్త్రీయంగా టారిఫ్ రేట్ల పెంపుదల నిర్ణయం జరగలేదు. ఎక్కువ విద్యు వినియోగించే వారికి పెరుగుదల నామమాత్రంగా ఉంది. ఈ భారం వల్ల చాలా మంది విద్యుత్ వినియోగానికి దూరమయ్యే అవకాశం ఉంది.</p>	<p>గృహ వినియోగం-1 విభాగం 0-50 యూనిట్లకు రూ.1-45. టారిఫ్ గత 20 సంవత్సరాల నుండి పెంచ లేదు మరియు గత 5 సంవత్సరాలుగా అన్ని విభాగాలకు విద్యుత్ ధరలను పెంచలేదు మరియు సరఫరా చేయడానికి అయ్యే వ్యయం యూనిట్ ఒక్కంటికి రూ.7-14. ఈ వ్యయం రూ.1-45 నుండి రూ.1-95 పైసలు పెంచినప్పటికీ సరఫరా చేసే విద్యుత్ వ్యయం (27%) మాత్రమే. టారిఫ్ విధానం మరియు చార్జీల పై తుది నిర్ణయం గౌరవ కమీషన్ వారి పరిధిలోని అంశం. గత 5 సంవత్సరాల నుండి అన్ని రకాల వ్యయాలు పెరిగినందున విద్యుత్ ధరల పెంపు సమంజసమే.</p>
5.	<p><b>మిగులు విద్యుత్ :</b> డిస్కాములకు 20,537.95 మెగావాట్ల విద్యుత్ అవసరమని తేలింది. కానీ డిస్కామ్ను 25,760 మెగావాట్ల అవసరమని చెప్పారు. 76 శాతం పిఎల్ఎఫ్ లెక్కించి మిగులు విద్యుత్ ఉంటున్నది. అవసరానికి మించిన విద్యుత్ ను కెటాయింపు అవసరమా? కాంట్రాక్ట్ కుదుర్చుకున్నప్పుడు "ఫిక్స్డ్ చార్జీల" భారం వినియోగదారుల పై పడుతుంది. ఇది అవసరమా? గత సంవత్సరం 16,603 మెగావాట్ల వినియోగించాం. ఒకేసారి 9,150 మెగావాట్ల పెంచుకోవడం వల్ల ఉపయోగం ఏమిటి?</p>	<p>TS డిస్కం లు 2022-23 ఆర్థిక సంవత్సరానికి సంబంధించిన విద్యుత్ అవసరాల కొరకు సంబంధిత ఉత్పాదక స్టేషన్లు సూచించిన ఇంధన లభ్యతలను, నష్ట స్థాయిలను మరియు అమ్మకాల అంచనాలు కేటాయింపులలో పరిగణనలోకి తీసుకున్నాము. దీని వలన పైన సూచించిన విధముగా అంచనాలు వేసినప్పుడు వార్షిక ప్రాతిపదికన 3,066 MU విద్యుత్ మిగులుకు దారి తీసింది. సంవత్సరంలోని అన్ని నెలలకు ఇది వర్తించదు. అందువలన FY 2022-23 యొక్క కొన్ని నెలల్లో, TS డిస్కం లు విద్యుత్ లోటు పరిస్థితిని కలిగి ఉండవచ్చు.</p>

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	
		<p>గౌరవ కమిషన్ వారిచే ఆమోదించిన MYT ఆర్డర్ లో కాంట్రాక్ట్ సామర్థ్యానికి ప్రధానంగా ఊహించని విధంగా LIS లోడ్ ల పెరుగుదలే కారణం. LIS లోడ్ ల ఫలితంగా TS డిస్కంల గరిష్ట డిమాండ్ రాబోయే భవిష్యత్తులో 13,688 MW నుండి పెరుగుతుందని అంచనా వేయడమైనది. TS డిస్కం దాని వినియోగదారులకు (వ్యవసాయంతో సహా) 24x7 విద్యుత్ సరఫరాను అందించడానికి బాధ్యత వహిస్తుంది మరియు రాష్ట్రంలో విద్యుత్ అంతరాయాలు లేకుండా చూసేందుకు అదనపు సామర్థ్యాలతో ఒప్పందానికి కట్టుబడి ఉన్నాము.</p>
6.	<p><b>డిఎస్ఎం అమలులో డిస్కాముల నిర్లక్ష్యం :</b> డిమాండ్ సైడ్ మానెజ్మెంట్ విధానం రూపొందించి 2 దశాబ్దాలు గడుస్తున్నాయి. కానీ డిస్కాముల పంపు సెట్లకు కెపాసిటర్లు బిగించడంలో, కొత్త కనెక్షన్లు పొందిన రైతులకు ఫోల్స్, కండక్టర్ ఇవ్వకపోవడం వల్ల సర్వీస్ వైరి పై మోటార్లు నడుస్తున్నాయి. ఇది డిఎస్ఎం విధానానికి విరుద్ధం. వాస్తవ వినియోగం అంచనా వేయుట: నష్టాలను భర్తీ చేయటానికి మీటర్లు లేకుండా పంపిణీ చేస్తున్న వ్యవసాయ రంగం పై అదనపు వినియోగాన్ని చూపి నష్టాలను తక్కువ చూపుతున్నారు. వాస్తవ వినియోగ అంచనా వేయడానికి ట్రాన్స్ ఫార్మర్ వద్ద వ్యవసాయ ఫీడర్ కు మీటరు పెట్టి వినియోగాన్ని సెకరించవచ్చు. కానీ ఆ పని చేయకుండా ఇప్పటికీ నష్టాలు 10-11 శాతం ఉంటున్నట్లు డిస్కాముల చెప్పడం జరిగింది. ఈ నష్టాన్ని తగ్గించుకోడానికి గతంలో 30 వేళా కోట్లు ప్రభుత్వం మంజూరీ చేసి రిపేర్లు చేశారు. అయినా నష్టాలు పెరుగుతూనే ఉన్నాయి. నష్టాలు తగ్గించడం సాధ్యం కాదా?</p>	<p>TSNPDCL యొక్క DSM (డిమాండ్ సైడ్ మేనేజ్మెంట్) చర్యల అమలు కోసం తేది:01.10.2021న EESLతో ఒక అవగాహన ఒప్పందాన్ని (MoU) కుదుర్చుకుంది. MoU ప్రకారం, TSNPDCL వినియోగదారులకు విద్యుత్ సామర్థ్య ఉపకరణాలను అందించడానికి అవసరమైన పెట్టుబడులు మరియు సాంకేతికతను తీసుకురావడం ద్వారా ప్రతిపాదిత DSM కార్యక్రమం EESL మద్దతు ఇస్తుంది మరియు సూపర్ సమర్థవంతమైన ఎయిర్ కండిషనర్లు, IE3 మోటార్లు, BLDC ఫ్యాన్లు మొదలైన పరికరాలు. TSNPDCLలో పవర్ ఫ్యాక్టర్ ను మెరుగుపరచడం మరియు నష్టాలను తగ్గించడం కోసం 1,384 - 2/1 MVAR కెపాసిటర్ బ్యాంక్లను అమర్చడం జరిగినది. ఈ కెపాసిటర్ బ్యాంక్ల పని తీరును ప్రతి రోజూ కార్పొరేట్ కార్యాలయం నుండి పర్యవేక్షించబడుతోంది. 432 - 600 KVAR కెపాసిటర్ బ్యాంకులు గరిష్ట లోడ్ ఉన్న 11 KV ఫీడర్ల మీద లోడ్ తగ్గించడానికి మరియు లైన్ నష్టాల తగ్గింపు కోసం ఏర్పాటు చేయబడ్డాయి. పైన పేర్కొన్న వాటితో పాటు, విద్యుత్ చౌర్య కేసుల బుకింగ్, పాత మెకానికల్ మీటర్లను మార్చడం, మీటర్లకు సీల్స్ వేయడం, అధిక నష్టాలు ఉన్న 11 KV ఫీడర్లు మొదలైన వాటి ద్వారా నష్టాలను తగ్గించడం కోసం క్రమం తప్పకుండా చురుకైన తనిఖీలు నిర్వహించబడుతున్నాయి. సాంకేతిక నష్టాల తగ్గింపు కోసం 11 KV ఫీడర్ విభజన, కొత్త లైన్ల ఏర్పాటు 33/11 KV సబ్ స్టేషన్లు, కొత్త DTRలు, లోడ్ సమతుల్యత మొదలైనవి, 33 KV మరియు 11 KV ఫీడర్ల పై లోడ్లను పర్యవేక్షించడం క్రమం తప్పకుండా చేస్తున్నారు. TSNPDCLలో అవసరమైన మౌలిక సదుపాయాలు అంటే LT లైన్లు, 11 KV లైన్లు మరియు డిస్ట్రీబ్యూషన్ ట్రాన్స్ ఫార్మర్లను అందించిన తర్వాత మరియు వినియోగదారు వ్యవసాయ పంపు సెట్ల వద్ద 2/3 KVAR కెపాసిటర్లను అమర్చిన తరువాత మాత్రమే కొత్త వ్యవసాయ సర్వీసులు విడుదల చేయబడుతున్నాయి. వ్యవసాయ పంప్ సెట్ల వద్ద రియాక్టివ్ పవర్ సమతుల్యత మరియు</p>



క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు													
		<p>వ్యవసాయ పంపు సెట్లు ప్రభావవంతంగా వినియోగించడానికి 2/3 KVAR కెపాసిటర్లు లేని చోట అమర్చడానికి ప్రత్యేక కార్యక్రమాల నిర్వహిస్తున్నారు.</p> <p>TSNPDCL యొక్క T&amp;D నష్టాలు తగ్గుతున్నాయి మరియు అట్టి వివరాలు ఈ క్రింది విధంగా ఉన్నాయి.</p> <table border="1" data-bbox="1301 411 1912 592"> <thead> <tr> <th>క్రమ సంఖ్య</th> <th>ఆర్థిక సంవత్సరం</th> <th>% నష్టాలు (EHTతో సహా)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2018-19</td> <td>9.90</td> </tr> <tr> <td>2</td> <td>2019-20</td> <td>9.04</td> </tr> <tr> <td>3</td> <td>2020-21</td> <td>9.02</td> </tr> </tbody> </table>	క్రమ సంఖ్య	ఆర్థిక సంవత్సరం	% నష్టాలు (EHTతో సహా)	1	2018-19	9.90	2	2019-20	9.04	3	2020-21	9.02
క్రమ సంఖ్య	ఆర్థిక సంవత్సరం	% నష్టాలు (EHTతో సహా)												
1	2018-19	9.90												
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7.	<p><b>విద్యుత్ ప్రమాదాల్లో మరణించిన వారికి పరిహారాలు చెల్లించుట :</b> విద్యుత్ శాఖ లోపాల వలన మరణించిన వారికి, మరణించిన పశువులకు పూర్తి స్థాయిలో పరిహారం ఇవ్వడం లేదు. పెండింగ్ లో లేదా తమ లోపం కాదని త్రోసిపుచ్చడం జరుగుతున్నది. దీని పై న్యాయ విచారణ జరగడం లేదు. గౌరవ రెగ్యులేటరీ కమీషన్ ఈ ప్రమాదాల పై ప్రత్యేకంగా ఒక కమీషన్ ద్వారా సర్వే చేయించాలని కోరుతున్నాము.</p>	<p>గౌరవనీయులైన TSERC నిబంధనలకు లోబడి విద్యుత్ ప్రమాదాలకు పరిహారం చెల్లిస్తున్నాము. విద్యుత్ ప్రమాదాలు అరికట్టేందుకు ఎప్పటికప్పుడు పటిష్టమైన చర్యలను చేపట్టడం జరుగుతుంది.</p>												
8.	<p><b>డిస్కాముల నిర్లక్ష్యం వలన ట్రాన్స్ ఫార్మర్లు కాలిపోవడం, పంప్ సెట్లు కాలిపోవడం :</b> సబ్-స్టేషన్ లలో ఉండాలని 6 గురు సిబ్బందికి తక్కువగా ఉన్నారు. లైన్ మెన్ పోస్టులు చాలా కాలంగా ఖాళీగా ఉంటున్నాయి. అయినప్పటికీ డిస్కాముల వారికి వేతనాలు ఇస్తున్నట్లు టారిఫ్ పెంపుదల చేసి వినియోగదారుల పై భారాలు చేస్తున్నారు. నిర్లిష్ట నియామకం ప్రకారం సిబ్బందిని నయమించాలని డిస్కాములను ఆదేశించగలరు. ట్రాన్స్ ఫార్మర్లకు ఎబి స్విచ్ ల ఉండవు. ట్రాన్స్ ఫార్మర్ చుట్టూ గడ్డి, గాఢం పెరిగి ఉంటుంది. ఎర్రింగ్ ఉండదు. వీటి ఫలితంగా ట్రాన్స్ ఫార్మర్లు కాలిపోవడం వాటి ఫలితంగా పంప్ సెట్లు కాలిపోతున్నాయి. వేల రూపాయల వ్యయం చేసి తిరిగి పంప్ సెట్ బాగు చేయించుకోవడం చేతకాక పంటనే వదిలి వేస్తున్నారు. విద్యుత్ సరఫరా వైఫల్యం వలన జరుగు పంట నష్టాలకు డిస్కాములనే బాధ్యులను చేయాలి.</p>	<p>I) ARR ప్రతిపాదనలలో ఖాళీగా ఉన్న ఉద్యోగుల వ్యయం పరిగణలోకి తీసుకోబడలేదు.</p> <p>II) HVDS సిస్టమ్లో ఏర్పాటు చేసిన DTRలకు ప్రత్యేక AB స్విచ్లు అందించబడవు. ఫీడర్లోని వినియోగదారులకు అంతరాయాలను తగ్గించడానికి ఈ DTRలకు AB స్విచ్లు నియంత్రణ పాయింట్లో అందించబడతాయి.</p> <p>III) అధిక కెపాసిటీ ట్రాన్స్ ఫార్మర్లకు అన్నిటికీ AB స్విచ్లు కలిగి ఉన్నాయి. AB స్విచ్లు ఎప్పుడైనా పని చేయకపోయినా వాటిని మరమ్మత్తు చేయడం గాని మార్చడం గాని జరుగుతుంది.</p> <p>IV) సరఫరా వైఫల్యం కారణంగా పంట నష్టం జరిగిన సంఘటనలు ఎక్కడ నివేదించబడ లేదు.</p>												
9.	<p><b>ట్రాన్స్ మిషన్ - కలం గతించిన కండక్టర్ పై విద్యుత్ సరఫరా చేయడం వల్ల వస్తున్నా నష్టాలు :</b> ట్రాన్స్ మిషన్ కండక్టర్ 30-35 సంవత్సరాల క్రితం వేసిన వాటితోనే విద్యుత్ సరఫరా చేతున్నారు. ఫలితంగా సరఫరా నష్టాలు ఎక్కువగా</p>	<p>మా సిబ్బంది తరచూ ఫిల్డ్ సర్వే చేస్తూ పాడై/విరిగి పోయిన లేదా వంగి పోయిన స్తంభాలను మరియు పాడైపోయిన తీగలను గుర్తించి మార్చడం జరుగుతుంది. అంతే కాకుండా మాకు విరిగిపోయిన లేదా పాడై/విరిగి పోయిన స్తంభాలు మరియు తెగి పోయిన తీగల గురించి</p>												

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	
	<p>ఉంటున్నాయి. చాలా పంప్ సెట్లకు 5-6 ఫోల్స్ దూరం సర్వీస్ వైరుతో రైతులకు కనెక్షన్లు ఇచ్చారు. దీనివల్ల లో-వోల్టేజ్ సమస్య వస్తున్నది. 20 సంవత్సరాలు కాలం గతించిన కండక్టర్ ను మార్చడానికి దెబ్బతిన్న స్తంభాలను తిరిగి కొత్తవి వేయడానికి రెగ్యులేటరీ కమీషన్ ఆదేశాలు ఇవ్వాలి.</p>	<p>వచ్చిన ఫిర్యాదులను అప్పటికప్పుడు పరిష్కరించడం జరుగుతుంది. వివిధ రకాల పథకాలలో కూడా విరిగిపోయిన లేదా వంగి పోయిన స్తంభాలను మరియు పాడైపోయిన తీగలను గుర్తించి సరి చెయ్యడం జరిగింది. వివిధ రకాల పథకాల క్రింద ఇప్పటి వరకు 31,524 కిలో మీటర్ల కండక్టర్ మరియు 76,019 స్తంభాలను మార్చడం జరిగినది.</p>
10.	<p><b>నిర్వహణ కమిటీలు ఏర్పాటు చేయాలి :</b> విద్యుత్ సంస్థల నిర్వహణ సమీక్షకు సబ్-స్టేషన్ వారి కమిటీలు, మండల స్థాయి కమిటీని వేయాలి. రాష్ట్ర స్థాయిలో అఖిల పక్ష కమిటీ వేయాలి. గతంలో ఈ కమిటీలు వేయడం వల్ల నిర్వహణ బాగా జరిగిన అనుభవం ఉంది. ఇందుకు ప్రభుత్వాన్ని ఆదేశించాలని కోరుతున్నాను.</p>	<p>గౌరవ కమీషన్ వారి ఆదేశాల ప్రకారం తగు చర్యలు తీసుకొనబడును.</p>



**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల**  
**శ్రీ ఎం. శ్రీధర్ రెడ్డి, హైదరాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాదానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాదానాలు
	సహేతుకమైన పెంపుదలను మేము ఆహ్వానిస్తున్నాం ... కొన్ని సవరణలను కోరుతున్నాం...	
1.	సమర్పణ భావంతో, నీతి, నిజాయితీతో పని చేస్తున్న అన్ని వర్గాల ఉద్యోగులను గుర్తించి, వారిని ప్రోత్సహించడానికి అవార్డు/రివార్డులు ఇవ్వవలసిందిగా కోరుచున్నాము. ఇస్తే వాటి వివరాలు తెలుపగలరు. (ఉదా. TEXMO మోటార్ల కంపెనీ వారి ఉద్యోగస్తులు వారి డీలర్ల వద్ద, డిస్ట్రిబ్యూటర్ల వద్ద టీ కూడా తాగరు. గుట్కా పాన్ పరాగ్ లాంటి జోలికి వెళ్ళరు). దురలవాట్లు లేని, కష్టపడి పని చేసే ఉద్యోగస్తులకు మేము కృతజ్ఞతా పూర్వక ధన్యవాదాలు తెలుపుతూ, వారిని ఆదరించి, అభినందించి, సన్మానించాలని కోరుతున్నాం.	స్వాతంత్ర్య దినోత్సవం మరియు గణతంత్ర దినోత్సవం సందర్భంగా, సంబంధిత సూపెరింటెండింగ్ ఇంజనీర్లు/ఆపరేషన్, టి.ఎస్.ఎన్.పి.డి.సి.ఎల్ పరిధిలో తమ విధులను నిర్వర్తించడంలో అంకితభావం మరియు నిజాయితీ గల ఉద్యోగుల పేర్లను ఉత్తమ ఉద్యోగులుగా నామినేట్ చేయడానికి సంబంధిత జిల్లా కలెక్టర్లకు సిఫారసు చేస్తోంది. అందుకు తగ్గట్టుగానే ఉత్తమ ఉద్యోగి అవార్డుతో సత్కరిస్తున్నారు. పైన పేర్కొన్నవి కాకుండా, నిర్దిష్ట అంశంలో లేదా మానెజ్ మెంట్ నిర్దేశించిన లక్ష్యాలను చేరుకోవడంలో ఉద్యోగుల పనితీరు ఆకట్టుకునేలా ఉన్నట్లు గుర్తించినప్పుడల్లా గౌరవనీయులైన సి.ఎం.డి/టి.ఎస్.ఎన్.పి.డి.సి.ఎల్ సంబంధిత ఉద్యోగులకు ప్రశంస పత్రాలు జారీ చేస్తున్నారు.
2.	NPDCL వారు విద్యుత్ ప్రమాదాలకు గురై మరణించిన కారణాలు సవివరంగా తెలిపారు. ప్రమాదానికి సరియైన కారణం గుర్తించినట్లయితే ప్రమాదాలను నివారించడానికి ఎక్కువ అవకాశం ఉంటుంది. ట్రాన్స్ ఫార్మర్ చెడిపోయిన సందర్భాలలో డిస్కం సొంత వాహనాలలో రవాణా చేసిన వాటి సంఖ్య కూడా ఇచ్చారు. పై వివరాలు ఇచ్చినందుకు సి.ఎం.డి. గారితో పాటుగా, ఇతర అధికారులు, సిబ్బంది అందరికీ మా కృతజ్ఞతాపూర్వక ధన్యవాదాలు తెలుపుకుంటున్నాం.	-
3.	వ్యవసాయ సర్వీసు కనెక్షన్ల కొరకు దరఖాస్తు పెట్టుకున్న రైతులచే ట్రాన్స్ ఫార్మర్ (DTR) కు గద్దె కట్టించడం పోల్స్ ట్రాన్స్ఫర్ చేయడం జరుగుతుంది. అనుభవరాహిత్యముతో పోల్స్ రవాణా చేస్తున్న సందర్భంగా కామారెడ్డి జిల్లా, రామారెడ్డి మండలం, గిద్దె గ్రామంలో ఇద్దరు రైతులు మరణించడం జరిగింది. గతంలో సిద్ధిపేట మరియు వరంగల్ జిల్లాల్లోను జరిగింది. అనుభవం లేని రైతులచే పోల్స్ రవాణా చేయించడం, పోల్స్ ఎత్తించడం ప్రమాదకరం.	వినియోగదారులు DDలు చెల్లించిన తరువాత నూతన వ్యవసాయ సర్వీసు కనెక్షన్ కోసం ఏర్పాటు చేయు ట్రాన్స్ ఫార్మర్ గద్దె నిర్మాణం, పోల్స్ మరియు ఇతర సామాగ్రి ఎస్టిమేట్ లో చేర్చడం జరుగుతుంది. రైతులు రవాణా చేయాల్సిన అవసరం లేదు మరియు ఇతరులకు ఎలాంటి చెల్లింపులు చేయాల్సిన అవసరం లేదు.

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాదానాలు
	ఇప్పటి వరకు ఇటువంటి సంఘటనలు ఎన్ని జరిగాయి? డిస్కమ్ చేయాలిని పని రైతులచే చేయించి వారిని ప్రమాదానికి గురిచేసి చంపిన అధికారుల పై తీసుకున్న చర్యలేమిటి? భవిష్యత్ లో ఇలాంటివి జరకుండా చూడవలెను.	
4.	వ్యవసాయ వినియోగదారునికి కొత్త కనెక్షన్ ఇచ్చిన సందర్భాలలో ఉన్న శాంక్షన్ లో ఉన్న మెటీరియల్ కు, వాడిన మెటీరియల్ తేడాలు ఉంటున్నవి. కొన్ని సామానులు, వినియోగదారులచే కొనిపిస్తున్నారు. దీనిపై పారదర్శకత అవసరం. వాడిన మెటీరియల్, శాంక్షన్ అయిన మెటీరియల్ List వినియోగదారునికి ఒక కాపీ ఇచ్చి సంతకం తీసుకోవాలి. Periodical గా మెటీరియల్ వినియోగం పై 3 <sup>rd</sup> పార్టీ ఎంక్వైరీ జరిపించాలి.	వ్యవసాయ సర్వీసు కనెక్షన్ కోసం కావలసిన ప్రతి సామాగ్రి ఎస్టిమేట్ లో వేయడం జరుగుతుంది శాంక్షన్ అయిన వెంటనే సంబంధిత అధికారి జిల్లా స్టోర్ నుండి సామాగ్రిని తీసుకోని సంబంధిత సర్వీసు పని నిమిత్తము ఉపయోగించడం జరుగుతుంది. డ్రా చేసిన సామాగ్రి వివరాలు సంబంధిత వినియోగదారునికి SMS ద్వారా తెలియపర్చడం జరుగుతుంది. వ్యవసాయ సర్వీసు పని పూర్తి అయిన తరువాత ఉన్నతాధికారులచే తనిఖీ నిర్వహించడం జరుగుతుంది. NPDCLలో నిర్మించిన వివిధ పనుల నాణ్యత ప్రమాణాలను తనిఖీ చేయుటకు ప్రత్యేక విభాగము ఏర్పాటు చేయడమైనది. అట్టి పనులలో నాణ్యత ప్రమాణాలు లోపించిన యెడల తగు చర్యలు తీసుకోవడం జరుగుతుంది.
5.	Regulation 4 of 2013 ప్రకారంగా DTR నిర్మాణ ఖర్చు డిస్కం బాధ్యత అని ఉంది. వాస్తవంగా క్షేత్ర స్థాయిలో Agricultural వినియోగదారుల అంచనా (Estimate) లో కలిపి ORC చెల్లించమని అంటున్నారు. Regulation 4 of 2013 అమలు చేయడం లేదు. కారణం తెలుపగలరు.	TSNPDCL పరిధిలో వ్యవసాయ కనెక్షన్ల విడుదల కోసం ఈ క్రింది విధానాన్ని పాటించడం జరుగుతుంది. 1. HT లైన్, LT లైన్ మరియు DTR అవసరమైన వ్యవసాయ కనెక్షన్ కు ఎస్టిమేట్ ఖర్చులో రూ.70,000/- వరకు ఖర్చును TSNPDCL భరిస్తుంది. మిగిలిన మొత్తాన్ని వినియోగదారుడు చెల్లించాల్సి ఉంటుంది. 2. LT లైన్ మాత్రమే అవసరమైన వ్యవసాయ కనెక్షన్ కు ఎస్టిమేట్ ఖర్చులో రూ.45,000/- వరకు ఖర్చును TSNPDCL భరిస్తుంది. మిగిలిన మొత్తాన్ని వినియోగదారుడు చెల్లించాల్సి ఉంటుంది. తేది.26-10-2016 రోజున మరియు అంతకంటే ముందు మంజూరైన వ్యవసాయ కనెక్షన్ ఎస్టిమేట్లను పైన పేర్కొన్న విధముగా ఎస్టిమేట్ వేసి మంజూరు చేయవలసిందిగా ఆదేశించడం జరిగినది .కొత్తగా వచ్చే ప్రతి వ్యవసాయ కనెక్షన్ ఎస్టిమేట్లను మెమో నెం.సిజిఎం(సి)/జిఎం(సి)/ ఏఈ(సి)/ ఏఈ(సి)/డినెం.76/16-17, తేది.01-11-2016 ప్రకారం విడుదల చేయ వలసిందిగా పేర్కొనడం జరిగినది.
6.	Cat-V Agriculture కు సంబంధించిన 2020-21 సం.ను మరియు 2021-22 సం. ఇప్పటి వరకు గడిచిన కాలానికి సంబంధించిన ORC Circle wise వసూలు అయినమొత్తం ఎంత?	వ్యవసాయ సర్వీసుల నుండి ORC రూపంలో సేకరించిన మొత్తం సర్కిల్ వారీగా క్రింద పట్టికలో చూపించడమైనది.

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాదానాలు			
		క్రమ సంఖ్య	సర్కిల్	ఆర్థిక సంవత్సరం 2021-22 (రూ. రూపాయలు)	ఆర్థిక సంవత్సరం 2020-21 (రూ. రూపాయలు)
		1	హనుమకొండ	3718680	1701427
		2	వరంగల్	983951	780837
		3	జనగామ	1955974	803072
		4	భూపాలపల్లి	5469718	7345384
		5	మహబూబాబాద్	9697518	375364
		6	కరీంనగర్	2040412	3061037
		7	జగిత్యాల	802565	601161
		8	పెద్దపల్లి	1146178	601334
		9	ఖమ్మం	14835401	15516437
		10	భద్రాద్రి కొత్తగూడెం	30514356	30743079
		11	నిజామాబాద్	3731455	5001487
		12	కామారెడ్డి	7236268	5914153
		13	ఆదిలాబాద్	7776967	7631407
		14	నిర్మల్	4908764	6608892
		15	మాంచెరిల్	15636463	14477470
		16	ఆసిఫాబాద్	13430341	8310858
			టి.ఎస్.ఎన్.పి.డి.సి.ఎల్	<b>12,38,85,011</b>	<b>10,94,73,399</b>
7.	2020-21 మరియు 2021-22 సంవత్సరములకు సంబంధించి Discom వారీగా వ్యవసాయ విద్యుత్ వినియోగము మిలియన్ యూనిట్స్ (MU)లలో ఎంత? అట్టి వినియోగానికి క్రాస్-సబ్సిడీ పోనూ ఏ టారిఫ్ ప్రకారంగా బిల్లు చేస్తున్నారు? దానిని రాష్ట్ర ప్రభుత్వం చెల్లిస్తున్నది. Agricultural Category క్రింద (గృహ, గృహేతర సబ్సిడీలు పోనూ) ఇప్పటి వరకు చెల్లించిన మొత్తం ఎంత? ఇంకా	డిస్కం యొక్క వ్యవసాయ విద్యుత్ వినియోగము ఆ.సం. 2020-21 కి 7,904 ఎం.యు మరియు ఆ.సం. 2021-22 (నవంబర్ నెల వరకు) 3,829 ఎం.యు. ఇట్టి వినియోగానికి గౌరవ కమీషన్ వారు ఆ.సం. 2018-19 కొరకు జారీ చేసిన టారిఫ్ ఆర్డర్ ప్రకారం బిల్లు చేస్తున్నాము మరియు రాష్ట్ర ప్రభుత్వం ఆ.సం. 2018-19 నుండి ఇప్పటి వరకు చెల్లించిన మొత్తం సంవత్సరాల వారీగా ఈ క్రింద పేర్కొనడం జరిగినది.			

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాదానాలు	
		ఆర్థిక సంవత్సరం	రూ. కోట్లలో
	బాకీ ఉన్నది ఎంత?	2018-19	2,703
		2019-20	2,756
		2020-21	3,285
8.	కోర్టుల్లో PPA లకు సంబంధించిన కేసులు ఎన్ని ఉన్నాయి? Discom లెక్క ప్రకారం అదనపు (Excess) పేమెంట్ ఇచ్చినది ఎంత? వాటి స్థితి ఏమిటి? వాటికి సంబంధించిన వరకు న్యాయవాదులకు (Advocateలకు) ఇప్పటి వరకు చెల్లించిన ఫీజు ఎంత? అట్టి కేసుల్లో Involve అయిన మొత్తం డబ్బు ఎంత? తప్పు జరిగినది అనుకొని, కోర్టుకు వెళ్లిన (Discom/Supplier) సందర్భాలకు సంబంధించిన దానిలో Internal Audit లో తేలినది ఏమిటి? బాధ్యులపై చర్యలు ఏమైనా తీసుకున్నారా? వివరాలు తెలుపగలరు. రాష్ట్ర ప్రభుత్వ విజిలెన్స్ వారికి తగిన విచారణ కొరకు పంపించారా? తెలియజేయగలరు.	వివిధ విద్యుత్ కొనుగోలు ఒప్పందాల పై (అత్యధిక భాగం గ్యాస్ ఆధారిత విద్యుత్ కొనుగోలు ఒప్పందాలు) వివిధ కోర్టుల్లో 104 కేసులు పెండింగ్ లో ఉన్నాయి. అంతర్గత ఆడిట్ నివేదికలలో ఎటువంటి కేసులు పేర్కొనబడలేదు కావున బాధ్యులైన వ్యక్తులపై చర్య తీసుకోవడమనేది తలెత్తదు. విచారణ కోసం రాష్ట్ర ప్రభుత్వ విజిలెన్స్ విభాగానికి ఎలాంటి కేసులు పంపబడ లేదు.	
9.	6 నెలలు పైగా రూ.50,000/- పైగా బిల్లు చెల్లించని ప్రభుత్వ, ప్రభుత్వేతర వర్గాల (జాబితా) List లు పెట్టినారు. చిన్న పరిశ్రమలు, చేతి వృత్తల వారిని మినహాయించి, మిగతా వారి బాకీ వసూళ్లకు మీరు చేస్తున్న ప్రయత్నం ఏమిటి? ఫార్మాట్-9, (ఎ), (బి) అంకెలను పదాలలో తెలపగలరు. ఉదా: 1535008944.52 రూ.లు లక్షలలో. ఒక నెల విద్యుత్ బిల్ చెల్లించని కారణంగా Due Date అయిన మరుసటి రోజున కట్ చేయకూడదు. వినియోగదారుడు వారి వెనుక ముందు తరాలు కూడా వినియోగదారులే. అతను డిస్కం నుండి విడిపోడు. కష్టం వచ్చిన సందర్భాల్లో డిస్కం వారు వినియోగ దారునికి మరికొంత వెసులుబాటు ఇవ్వాలి.	మీరు తెలిపిన విధంగా ప్రభుత్వేతర వినియోగదారుల విద్యుత్ బకాయిల జాబితా వెబ్-సైట్లో ఉంచబడ్డాయి. వినియోగదారుల నుండి బకాయిల వసూలులో భాగంగా వివిధ రకాలుగా వినియోగదారులలో అవగాహన పెంపొందిస్తూ మరియు బిల్లు చెల్లించని వినియోగదారుని సర్వీసును డిస్-కనెక్ట్ చేయడం జరుగుతుంది. ప్రభుత్వ బకాయిలకు సంబంధించి, సెప్టెంబర్ 2019 నుండి ప్రభుత్వ శాఖలు, పంచాయతీలు మరియు మున్సిపాలిటీల CC బకాయిలను క్రమం తప్పకుండా చెల్లిస్తోంది. వినియోగదారుని విద్యుత్ బకాయి గడువు తేది తరువాత గౌరవ కమీషన్ వారి ధరల ఉత్తర్వును అనుసరించి 15 రోజుల సమయం ఇచ్చి తదుపరి విద్యుత్ కనెక్షన్ ను డిస్-కనెక్ట్ చేయడం జరుగుతుంది.	
10.	ట్రాన్స్ ఫార్మార్ ఫెయిల్ అయినప్పుడు గ్రామీణ కన్సూమర్స్ ను రిపేర్ సెంటర్ లకు తీసుకు వస్తే గతంలో రవాణా ఛార్జీలు చెల్లిస్తాం అని తెలిపినారు. ఎన్నింటికి చెల్లించారు? Circle wise వివరాలు ఇవ్వగలరు.	ఫెయిల్ అయిన ట్రాన్స్ ఫార్మర్ల రవాణా నిమిత్తం SPM వెహికిల్ మరియు సబ్ డివిజన్ వెహికిల్ అందుబాటులో ఉంచి ఎక్కువ శాతం తరలించడం జరుగుచున్నది. కానీ కొన్ని సమయాలలో ట్రాన్స్ ఫార్మర్ల ఫెయిల్చూర్స్ అధికమైనచో ఒకటి లేదా రెండు రోజుల జాప్యంతో ట్రాన్స్ ఫార్మర్లను డిపార్ట్మెంట్	



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		వెహికల్స్ ద్వారానే తరలించడం జరుగుచున్నది. అతి తక్కువ సందర్భాలలో వెహికల్ అందుబాటులో లేనిచో రైతులు తమ ఇష్టప్రకారమే ట్రాన్స్ఫార్మర్లను రవాణా చేయుచున్నారు
11.	CRRF విచారణలు కోవిడ్ నిబంధనలు పాటిస్తూ, క్షేత్రస్థాయిలో జరిపించాలి. అసలు CGRF అని ఫోరమ్ ఉన్నదని మెజారిటీ వినియోగదారులకు తెలియదు. ఫోరమ్ గురించి పలు విధాలుగా ప్రచారం చేయాలి. అన్ని Discom ఆఫీసులలో ప్రత్యేకంగా బోర్డులు ఏర్పాటు చేయాలి. కొన్ని ఫోరమ్ లలో 4 <sup>th</sup> Member కు సరియైన గౌరవ స్థానం ఇవ్వడం లేదు. TS NPDCL నిజామాబాద్ ఫోరమ్ సమర్థవంతంగా నెలకు 8 సార్లు విచారణ జరుపుతున్నారు. ఇది అభినందనీయం. హైకోర్టు కూడా కొన్ని రోజులు ప్రత్యక్ష విచారణ జరిపారు. TS SPDCL / TS NPDCL లోని నాలుగు ఫోరమ్ లలో గత సంవత్సరం ఎన్ని కేసులు నమోదు చేశారు. ఫోరంలలో ఎన్ని పరిష్కరించారు?	స్థానిక విద్యుత్ CGRFలచే క్రమం తప్పకుండా విచారణ సమావేశాలు నిర్వహించబడుతున్నాయి మరియు పెడ్యూల్ చేయబడిన తేదీలను స్థానిక వార్తా పత్రికలు మరియు ఎలక్ట్రానిక్ మీడియా ద్వారా ముందుగానే ప్రచురించడం జరుగుతుంది. ఆర్థిక సంవత్సరం 2020-21కి సంబంధించి CGRF కేసుల వారి వివరాలు క్రింది పట్టికలో సూచించడం జరిగింది.
12.	CGRFలో తీర్పు వచ్చిన తరువాత అట్టి పని సరియైన సమయంలో జరగడం లేదు. తీర్పు అమలు జరిగే ఏర్పాట్లు చేయాలి. అమలు చేయకుండా Discom స్థాయిలో వారిపై చర్యలు తీసుకోవాలి. దీనిని ఒక ఉన్నతాధికారికి అప్పగించి, ఎప్పటికప్పుడు పనులు చేయించాలి.	CGRF ఉత్తర్వులు డిస్కంలలో సత్వరమే అమలవుతున్నాయి. కార్పొరేట్ కార్యాలయం నుండి చీఫ్ జనరల్ మేనేజర్/ఆపరేషన్ ప్రధానంగా CGRFచే జారీ చేసిన ఆర్డర్ల అమలు పై ప్రత్యేక దృష్టి సారిస్తున్నారు.
13.	Toll Free No. కు ఫోన్ చేస్తే AE గారికి, ADE గారికి తెలిపారా? అని అడిగి, వారికి చెప్పండి అని చెబుతున్నారు. ఫోన్ రాగానే ఫిర్యాదు (Complaint) వ్రాసుకొని, Complaint నెంబర్ వినియోగదారునికి ఇవ్వాలి. Toll Free No. లు అయిన 100కు, 108కు గానీ ఫోన్ చేస్తే రెస్పాన్స్ ఎలా ఉంటుందో అలాగే ఉండాలి. Toll Free No. ద్వారా Circle wise ఎన్ని ఫిర్యాదులు స్వీకరించారు? ఎన్ని పరిష్కరించారు? SoP ప్రకారంగా విద్యుత్ అంతరాయాన్ని (DTR Failures) ఇతర సేవలు సంబంధించి SoP సమయంలో పరిష్కారం చేయకుండా డిస్కం స్థాయిలో తీసుకుంటున్న చర్యలు ఏమిటి? Toll Free No. అజమాయిషీ చేసే అధికారుల ఫోన్ నెంబర్లు ఇవ్వగలరు. అన్ని విద్యుత్ (AE, ADE, DE, SE, Bill Collection Centre మరియు సిటిజెన్ చార్జర్లలో) CGRF అడ్రెస్లు టోల్ ఫ్రీ నెంబర్లను వ్రాయించి, వాటిని	సాధారణంగా కాల్ సెంటర్ ఏజెంట్లు ఫిర్యాదులను నమోదు చేసేటప్పుడు ఫిర్యాదు సంబంధిత క్షేత్రస్థాయి సిబ్బందికి తెలియజేశారా లేదా అని విచారించి ఫిర్యాదు నమోదు చేసుకుంటారు. ఫిర్యాదు నమోదు పై వినియోగదారుడికి SMS రూపంలో ఫిర్యాదు నమోదు ID వివరాలు పొందుతారు. టోల్-ఫ్రీ నంబరుకు ఫిర్యాదు అందిన వెంటనే సమస్యను సంబంధిత అధికారులు పరిష్కరిస్తున్నారు. ప్రతి విద్యుత్ కార్యాలయం దగ్గర సంబంధిత అధికారుల ఫోన్ నెంబర్లను నోటీసు బోర్డుల ఏర్పాటు చేయడం జరిగింది. వినియోగదారులకు చెల్లింపుల గేట్వే సౌకర్యాన్ని అందజేస్తున్నాము మరియు చెల్లింపుల గేట్వేని ఉపయోగించడం ద్వారా వినియోగదారులు ఎక్కడి నుండైనా తన బిల్లును ఎప్పుడైనా చెల్లించవచ్చు. బిల్లులను నగదు రూపంలో ఎక్కడి నుండైనా చెల్లింపుల ప్రక్రియ పరిశీలనలో ఉంది.

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	ఉపయోగంలోకి తీసుకురావాలి. డిస్కం ప్రాంతంలోని అన్ని బిల్ కలెక్షన్ సెంటర్లలో ఏ ప్రాంతపు బిల్లులనైనా తీసుకునే విధంగా చర్యలు చేపట్టాలి.	
14.	<p>HT Category లో కాలనీలు, పంచాయితీలు, వాటికి సంబంధించిన క్యాటగిరీకి ఇంతకు ముందు రూ.లు 6.30 పైగా ఉండేది. దానిని పెంచడానికి ప్రపోజల్ గా ARR లో ప్రతిపాదించారు. అట్టి విభాగంలోనే గేటెడ్ కమ్యూనిటీకి సంబంధించినవి కూడా అందులోనే ఉన్నాయి. గేటెడ్ కమ్యూనిటీ కానీ గృహాలు, అపార్ట్మెంట్ లోని ఫ్లాట్లు/మధ్య తరగతి గృహాలకు 300 యూనిట్స్ దాటితే అత్యధిక టారిఫ్ వర్తిస్తుంది. కానీ కోట్లాది రూ.లు విలువైన విల్లాలు, గేటెడ్ కమ్యూనిటీలో ఉన్న కోట్లాది విలువైన ఫ్లాట్లలో నివసించే వారికి HT-6 క్యాటగిరీలో ఉన్న కారణంగా తక్కువ టారిఫ్ ఉన్నది. అదే ఐక్యత లేని ఎవరి (రాజకీయ/వివిధ ప్రజా సంఘాలు) ఆదరణ లేని (నోరులేని) మధ్యతరగతి వర్గాలు మాత్రమే ఎక్కువ టారిఫ్ చెల్లించాల్సి వస్తుంది. చిన్న వ్యాపారాలు గ్రామాల్లో ఇంటిలోనే వ్యాపారం చేసుకునే వర్గాల వారికి కూడా LT-II Category లో యూనిట్ కు 8 రూ.ల నుండి 11 రూ.లు చెల్లించాల్సి వస్తుంది. అదే గేటెడ్ కమ్యూనిటీలో ఉన్న వ్యాపార సంస్థలు అని, సర్వీస్ సెంటర్లు, సూపర్ మార్కెట్లు మొదలగునవి తక్కువ టారిఫ్ చెల్లిస్తున్నారు. గేటెడ్ కమ్యూనిటీ అనేది గతంలో దాదాపు లేదు. కొన్ని సం.ల నుండి కొంతమేర ప్రారంభం అయి ఇటీవల కాలంలో వినియోగం చాలా పెరుగుతుంది. కావున వారికి వేరే క్యాటగిరీ (సింగరేణి కాలరీస్ - ఇతర ఇండస్ట్రియల్ కార్మికుల కాలరీలు లాగా కాకుండా) అమలు చేయాలి. చెల్లించే స్తోమత ఉన్న వారి నుండి సరియైన ధర నిర్ణయించి డిస్కంలను బలోపేతం చేయవలసిందిగా గౌరవ కమీషనర్ వారిని కోరుతున్నాం. ఆరంతస్తుల భవనాల విద్యుత్ వినియోగం కన్నా, బహుళ అంతస్తుల భవనాల వారు దాదాపు 6 నుండి 10 రేట్లు ఎక్కువ విద్యుత్ ను వినియోగించి పర్యావరణానికి విఘాతం కలిగిస్తున్నారు.</p>	<p>HT-క్యాటగిరీ VI విభాగంలో వినియోగదారుల నుండి విద్యుత్ చార్జీల క్రింద ఎనర్జీ చార్జీల రూపంలో మరియు డిమాండ్ చార్జీల రూపంలో వాసులు చేయడం జరుగుతుంది. 2022-23 సంవత్సరానికి విద్యుత్ సంస్థ ప్రతిపాదించిన ధరలలో ఈ విభాగం క్రింద ఎనర్జీ చార్జీల రూపంలో యూనిట్ ఒక్కంటికి రూ.7-30 పైసలు మరియు డిమాండ్ చార్జీల రూపంలో రూ.260/KVA నెలకు వసూలు చేయుటకు ప్రతిపాదించడమైనది.</p> <p>పై విభాగం వినియోగదారులను HT విభాగం క్రింద జారీ చేయడం జరుగుతుంది. ఇందులో విద్యుత్ సరఫరా నష్టాలు తక్కువగా ఉండి ఈ విభాగం క్రింద సరఫరా చేసే విద్యుత్ సరఫరా వ్యయం తక్కువగా ఉంటుంది.</p>
15.	పర్యావరణం కారణంగా ధర్మల్ విద్యుత్ 2023 వరకు కొంత మేరకు తగ్గించుకోవాల్సి ఉంది. దాని కొరకు తీసుకుంటున్న చర్యలు	విద్యుత్ కొనుగోలు ఒప్పందాలు ధర్మల్, సోలార్ ప్రాజెక్టులు మొదలైన వాటితో సహా 25 సంవత్సరాల కాలానికి చేయబడ్డాయి.

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	<p>ఏమిటి? ప్రత్యేకంగా సోలార్ మన రాష్ట్రంలో 325 రోజులు అందుబాటులో ఉంటుంది. సోలార్ పైన గతంలో ఎన్.పి.డి.సి.ఎల్. చాలా అభివృద్ధి సాధించి అవార్డులు కూడా పొందారు. పర్యావరణాన్ని దృషిస్తే పెట్టుకొని, సంప్రదాయేతర (Renewable) ఇంధనాలతో విద్యుత్ ఉత్పత్తికి ప్రోత్సాహమివ్వాలి ఉంది. దేశ వ్యాప్తంగా గ్రీడ్ సౌకర్యం మెరుగు పడిన, పడుచున్న అవకాశాన్ని అందిస్తున్నట్లుగా దేశంలో ఎక్కడ తక్కువ ధరకు లభ్యమవుతుందో అక్కడ కొనుగోలు చేయాలి.</p>	<p>ధర్మల్ విద్యుత్ కేంద్రాలు ప్రకటించిన విద్యుత్ లభ్యతను ఆధారంగా విద్యుత్ ను కొనుగోలు చేయవలసిన భాద్యత డిస్కంలది. సోలార్ విద్యుత్ కేంద్రాల నుండి విద్యుత్ కేవలం ఉదయం 10:00 గంటల నుండి సాయంత్రం 5:00 గంటల వరకు మాత్రమే అందుబాటులో ఉంటుంది. ఈ సోలార్ విద్యుత్ కేంద్రాలను ఇతర ధర్మల్ విద్యుత్ కేంద్రాల వలె బేస్ లోడును తీర్చడానికి ఉపయోగించ లేము.</p> <p>తెలంగాణ రాష్ట్రంలో సౌర సంభావ్య లభ్యతను ఉపయోగించుకోవడం కోసం, పోటీ బిడ్డింగ్లు నిర్వహించబడ్డాయి, రాష్ట్ర విభజన తర్వాత 2014 &amp; 2015 సంవత్సరాల్లో PPAల క్రింద 2500 MW సౌర సామర్థ్యం జోడించబడింది. రాష్ట్రం వెలుపల ఉన్న ISTS ప్రాజెక్ట్ల ద్వారా సౌర విద్యుత్ను ఇ-రివర్స్ బిడ్డింగ్ ద్వారా పోటీ ధరలకు కొనుగోలు చేయడానికి SECI/NTPCతో ఒప్పందాలు కుదిరాయి.</p> <p>2022-23 ఆర్థిక సంవత్సరానికి అదనంగా 2000 మెగావాట్ల RE పవర్ సామర్థ్యం జోడించబడింది. TSDISCOMలు అంచనా వేయబడిన డిమాండ్ను తీర్చడానికి మరియు ఖర్చు భారాన్ని తగ్గించడానికి అత్యంత ఫలితాలిచ్చే మార్గంలో పవర్ ప్లానింగ్ను తయారు చేసి అమలు చేస్తున్నారు.</p>
16.	<p>బస్-స్టాండ్, రైల్వే స్టేషన్ల సరసన ఎయిడ్ పోర్ట్ ను చేర్చారు. బస్-స్టాండ్లు, రైల్వే స్టేషన్లో టీలు, తినుబండారాలు, ఇతర వస్తువులు రేట్లు మరియు స్టేషన్ సర్వీస్ చార్జీలు అతి స్వల్పం. ఎయిర్ పోర్టులో టీ రూ.200/- పైగా ఉంటుంది. అలా అన్నింటికీ ఎక్కువ ధరలే వసూలు చేస్తుంటారు. ఎయిర్-పోర్ట్ నిర్వహణ కొరకు ప్రతీ ఎయిర్ టికెట్ పైన కొంత చార్జీ ఉంటుంది. ఎయిర్ పోర్టులో పలు విదేశీ మద్యం షాపులు, నగల షాపులు, ఇతర దేశ, విదేశీ బ్రాండ్ల వస్తువులు అత్యధిక ధరలకు అమ్ముడయ్యే వస్తువులు ఉంటాయి. అడ్వార్టైజింగ్ హోర్డింగ్లు రాష్ట్రంలో ఎక్కడ ఏర్పాటు చేసినా యూనిట్ కు 13 రూ.లు చెల్లించాలి. కానీ ఎయిర్ పోర్టులో హోర్డింగులపై, వ్యాపార స్థలాలకు, షాపులకు, స్టార్ హోటల్ కు వాటికి సంబంధించిన క్యాటగిరీల క్రిందనే, ఎయిర్ పోర్ట్ బయట టారిఫ్ ఎలా ఉందో, వీటికి కూడా టారిఫ్ ను అలాగే నిర్ణయించాలి. ఏవియేషన్ కు సంబంధించి సాంకేతిక మరియు ప్రయాణికులు వేచి ఉండే గదులకు కూడా రైల్వే స్టేషన్, బస్-స్టేషన్ల టారిఫ్</p>	

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	<p>కాకుండా, కమర్షియల్ టారిఫ్ ను వర్తింపజేయాలి. గతంలో మేము అడిగిన ప్రశ్నకు గౌరవ ERC వారు వాస్తవ వినియోగాన్ని విభజించాలి అని ఆర్డరు జారీ చేశారు. దాని ప్రకారంగా ప్రస్తుతం రాజీవ్ గాంధీ ఇంటర్ నేషనల్ ఎయిర్ పోర్ట్ (GMR) పరిధిలో ఉంటే మొత్తం రైతుల వద్ద సేకరించిన 5400 ఎకరాలలో ఎన్ని సర్వీసులు ఉన్నాయి? అవి ఏ క్యాటగిరి క్రింద ఉన్నాయి? వాటి వినియోగం ఎంత? వాటి టారిఫ్ మరియు ఫిర చార్జీలు (Fixed) ఎంత తెలియజేయగలరని Discomలను కోరుతూ గౌరవ కమీషన్ వారిని వాస్తవ వినియోగాన్ని మరియు వాటి ఆదాయాన్ని దృష్టిలో పెట్టుకొని టారిఫ్ నిర్ణయించి అమలు చేయించి, డిస్కమ్ ల ఆదాయాన్ని పెంచే ప్రయత్నం చేయాలనీ విన్నవించుకుంటున్నాం.</p>	
17.	<p>ఇటీవల క్షేత్రస్థాయిలో పనిచేసే తాత్కాలిక చిన్న ఉద్యోగులందరినీ పర్మినెంట్ చేయడం జరిగింది. వారి సర్వీసు సంవత్సరాలను దృష్టిలో పెట్టుకొని తగు విధంగా వారి వేతనాలను పెంచాలి. కేంద్రా ప్రభుత్వ ఉద్యోగులకు పి.ఆర్.సి. ప్రతి 10 సం.లకు, రాష్ట్ర ప్రభుత్వ ఉద్యోగులకు 5 సం.లకు ఒక సారి అమలు చేస్తారు. కానీ అత్యధిక వేతనాలు ఉన్న డిస్కం, ట్రాన్స్ కో, జెన్ కో ఉద్యోగులకు మాత్రం 4 సం.లకు ఒకసారి పి.ఆర్.సి. అమలు చేయడం జరుగుతుంది. రాష్ట్ర ప్రభుత్వ ఉద్యోగుల్లాగా పి.ఆర్.సి.ని 5 సం.లకు ఒక సారి అమలు చేసి, వినియోగదారుల పై భారం పెరగకుండా చూడాలని గౌరవ కమీషన్ వారిని కోరుంచున్నాము.</p>	<p>TSNPDCL లో పని చేస్తున్న ఔట్-సోర్సింగ్ ఉద్యోగులను TSNPDCLలో ఆర్డీజన్లుగా చేస్తారు. లేబర్ కమీషన్ తో ఒప్పందం కుదుర్చుకోవడం ద్వారా వారి సర్వీస్ నిబంధనలు నిర్దేశించబడ్డాయి. ఇంకా, వారి వేతనాలు మరియు ఇంక్రిమెంట్లను ఎప్పటికప్పుడు నిర్ణయించడం మరియు విడుదల చేయడం జరుగుతుంది. వేతన సవరణకు సంబంధించి, పవర్ యుటిలిటీస్ ప్రత్యేక సంస్థలు. పవర్ యుటిలిటీస్ లో పని చేస్తున్న ఉద్యోగులు అత్యవసర సేవలో మరియు 24x7 కాలం పని చేస్తుంటారు. ఈ క్రమంలో వారి ఉద్యోగుల వేతన సవరణ కేంద్ర/రాష్ట్ర ప్రభుత్వ ఉద్యోగులతో పోల్చబడదు. అంతే కాకుండా, 1999 లో APSEBని అన్-బండలింగ్ చేయడానికి చాలా కాలం ముందు నుండి ప్రతి నాలుగు సంవత్సరాలకు ఒక సారి వేతన సవరణ జరుగుతోంది మరియు వేతన సవరణ యొక్క కాలానుగుణతను పెంచడం వలన TS పవర్ యుటిలిటీస్ లో పని చేస్తున్న ఉద్యోగులలో అశాంతి ఏర్పడవచ్చు.</p>
18.	<p>సెంట్రల్ విజిలెన్స్ కమీషన్ మరియు స్టేట్ విజిలెన్స్ కమీషన్ కు సంబంధించిన చట్టాలు/నిబంధనలను అనుసరించి విజిలెన్స్ ను ఏర్పాటు చేసి, వినియోగదారుల పైనే గాకుండా డిస్కామ్, ట్రాన్స్ కో, జెన్ కోల అంతర్గత అవకతవకల పై కూడా నిఘా ఉంచాలి. ప్రస్తుతం సి.వి.సి. నిబంధనలకు విరుద్ధంగా కంపెనీలోని ఉన్నతాధికారులే విజిలెన్స్ కు ఆధిపత్యం వహిస్తున్నారు. దీనిని చట్టబద్ధంగా చేయగలరని గౌరవ కమీషన్ వారికి విన్నవించు</p>	<p>TSNPDCL లోని విజిలెన్స్ వింగ్ ఏ డిస్కం అధికారి నేతృత్వంలో లేదు, కానీ జాయింట్ మేనేజింగ్ డైరెక్టర్ (విజిలెన్స్)/TS TRANSCO నియంత్రణలో పని చేస్తోంది. జాయింట్ మేనేజింగ్ డైరెక్టర్ ను ప్రభుత్వం నియమించింది. ప్రస్తుతం TSNPDCL లో చీఫ్ విజిలెన్స్ ఆఫీసర్ పోస్టును ఔట్-సోర్సింగ్ ప్రతిపాదికన రిటైర్డ్ అడిషనల్ సూపరింటెండెంట్ ఆఫ్ పోలీస్ తో నింపారు మరియు ప్రభుత్వం రెగ్యులర్ చీఫ్ విజిలెన్స్ ఆఫీసర్ ను నియమించే వరకు కొనసాగుతారు.</p>



క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాదానాలు
	కుంటున్నాం.	
	<p>డిస్కం, ట్రాన్స్ కో మరియు కేంద్ర ప్రభుత్వ సంస్థలు నూతనంగా నిర్మిస్తున్న HT Lines వేసేటప్పుడు చట్ట ప్రకారంగా విధులు (Procedure) నిర్వహించడం లేదు. ముందుగా భూయజమానికి నోటీసులిచ్చి నష్టపరిహారం నిర్ణయించాలి. అట్టి పరిహారంతో భూయజమాని తృప్తి చెందినచో జిల్లా కలెక్టర్ గారి వద్ద అప్పీలు చేసుకొని నష్టపరిహారం పెంపుదల కోరవచ్చు. కలెక్టర్ గారు నిర్ణయించిన నష్ట పరిహారంతో భూయజమాని తృప్తి చెందకుంటే గౌరవ తెలంగాణ రాష్ట్ర నియంత్రణ మండలి (TSERC) వారి వద్ద పెంపుదలకు అర్హి పెట్టుకుని సరియైన నాశపరిహారం పొందవచ్చు. కానీ ఇట్టి హక్కులు, సౌకర్యాల గురించి రైతులకు తెలియజేయడం లేదు. కనీసం నోటీసు కూడా ఇవ్వడం లేదు. సుమారు 140 సంవత్సరాల పూర్వం బ్రిటిష్ వారు చేసిన 1846వ సంవత్సర చలిగ్రాఫిక్ చిత్తాన్ని ఉపయోగించి ఇట్టి అన్యాయానికి ఒడిగడుతున్నారు.</p> <p>ఉదాహరణకు చెవులపల్లి గ్రామం, కేశంపేట మండలం, రంగారెడ్డి జిల్లాలో మరియు జగిత్యాల జిల్లా గొల్లపల్లి, పెగడలపల్లి మండలాల్లో ప్రస్తుతం జరుగుచున్నది. గత సంవత్సరం మొయినాబాద్ మండలం, రంగారెడ్డి జిల్లా. ఆమదాపూర్ గ్రామంలో కూడా ఇలాగే జరిగింది. పెద్దపులి జిల్లా మంథని మండలం, నాగారం గ్రామం, బెల్లంకొండ మల్లారెడ్డికి చెందిన ఒకే ఎకరం పొలంలో 19 విద్యుత్ HT స్తంబాలు పాతారు. అట్టి ఫోటోకాపీని జతపరుచుచున్నాము. పైనాన్నియల్ డిస్ట్రిక్ట్ లో నూతన సాంకేతికతను ఉపయోగించి మూడు అడుగుల స్తంబంలో HT 440 లైనును నిర్మించి నగరంలో ఉన్న ధనవంతులకు నష్టం కాకుండా కాపాడుతున్నారు. నూతనంగా నిర్మించే HT లైన్ల ప్రాంతాల్లో REC వారు బహిరంగ విచారణ జరిపి న్యాయం హేయగలరని విన్నవించుకుంటున్నాము.</p>	<p>సమ్మతి లేఖను సమర్పించి తగిన చెల్లింపులు జరిపినచో పోల్స్ పిస్టింగ్ పని చేపట్ట బడును.</p>
	<p>గౌరవ కమీషన్ వారికి మా సూచనలు, సలహాలను సహృదయంతో పరిశీలించి, మా సమస్యలను పరిష్కరించగలరని విన్నవించుకుంటున్నాం.</p>	

2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై

శ్రీమతి భాగ్య లత, కరీంనగర్ జిల్లా, శ్రీ డబ్బా రవి, జగిత్యాల జిల్లా, శ్రీ జి. నగేష్, నిజామాబాద్, శ్రీ కే. సాయి రెడ్డి, నిజామాబాద్ జిల్లా, శ్రీ కే. అంజన్న, కామారెడ్డి జిల్లా, శ్రీ జి. ఆనంద రావు, కామారెడ్డి జిల్లా, శ్రీ జె. శ్రీరంగా రావు, హైదరాబాద్, శ్రీ మాదిరెడ్డి రాజి రెడ్డి, రంగా రెడ్డి జిల్లా, శ్రీ డి. రాము, హైదరాబాద్, శ్రీ టి. శ్రీనివాస రావు, ములుగు, శ్రీ జె. సంపత్ కుమార్, కరీంనగర్ జిల్లా, శ్రీ మాణిక్ రెడ్డి, ఆర్.ఆర్. జిల్లా, శ్రీ జి. వినోద్ కుమార్, హైదరాబాద్, శ్రీ బి. మల్లి రెడ్డి, హైదరాబాద్, శ్రీ పార్వాడ అంజి రెడ్డి, సంగారెడ్డి జిల్లా మరియు శ్రీ విజయ్ గోపాల్ రావు, హైదరాబాద్ గారి సూచనలు/సలహాలకు సమాదానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాదానాలు
	సహేతుకమైన పెంపుదలను మేము ఆహ్వానిస్తూనే ... కొన్ని సవరణలను కోరుతున్నా...	
1.	సమర్పణ భావంతో, నీతి, నిజాయితీతో పని చేస్తున్న అన్ని వర్గాల ఉద్యోగులను గుర్తించి, వారిని ప్రోత్సహించడానికి అవార్డు/రివార్డులు ఇవ్వవలసిందిగా కోరుచున్నాము. ఇస్తే వాటి వివరాలు తెలుపగలరు. (ఉదా. TEXMO మోటార్ల కంపెనీ వారి ఉద్యోగస్తులు వారి డీలర్ల వద్ద, డిస్ట్రిబ్యూటర్ల వద్ద టీ కూడా తాగరు. గుట్కా పాన్ పరాగ్ లాంటి జోలికి వెళ్ళరు). దురలవాట్లు లేని, కష్టపడి పని చేసే ఉద్యోగస్తులకు మేము కృతజ్ఞతా పూర్వక ధన్యవాదాలు తెలుపుతూ, వారిని ఆదరించి, అభినందించి, సన్మానించాలని కోరుతున్నాం.	స్వాతంత్ర్య దినోత్సవం మరియు గణతంత్ర దినోత్సవం సందర్భంగా, సంబంధిత సూపెరించెండింగ్ ఇంజనీర్లు/ఆపరేషన్, టి.ఎస్.ఎన్.పి.డి.సి.ఎల్ పరిధిలో తమ విధులను నిర్వర్తించడంలో అంకితభావం మరియు నిజాయితీ గల ఉద్యోగుల పేర్లను ఉత్తమ ఉద్యోగులుగా నామినేట్ చేయడానికి సంబంధిత జిల్లా కలెక్టర్లకు సిఫారసు చేస్తోంది. అందుకు తగ్గట్టుగానే ఉత్తమ ఉద్యోగి అవార్డుతో సత్కరిస్తున్నారు. పైన పేర్కొన్నవి కాకుండా, నిర్దిష్ట అంశంలో లేదా మానేజ్ మెంట్ నిర్దేశించిన లక్ష్యాలను చేరుకోవడంలో ఉద్యోగుల పనితీరు ఆకట్టుకునేలా ఉన్నట్లు గుర్తించినప్పుడల్లా గౌరవనీయులైన సి.ఎం.డి/టి.ఎస్.ఎన్.పి.డి.సి.ఎల్ సంబంధిత ఉద్యోగులకు ప్రశంస పత్రాలు జారీ చేస్తున్నారు.
2.	NPDCL వారు విద్యుత్ ప్రమాదాలకు గురై మరణించిన కారణాలు సవివరంగా తెలిపారు. ప్రమాదానికి సరియైన కారణం గుర్తించినట్లయితే ప్రమాదాలను నివారించడానికి ఎక్కువ అవకాశం ఉంటుంది. ట్రాన్స్ ఫార్మర్ చెడిపోయిన సందర్భాలలో డిస్కం సొంత వాహనాలలో రవాణా చేసిన వాటి సంఖ్య కూడా ఇచ్చారు. పై వివరాలు ఇచ్చినందుకు సి.ఎం.డి. గారితో పాటుగా, ఇతర అధికారులు, సిబ్బంది అందరికీ మా కృతజ్ఞతాపూర్వక ధన్యవాదాలు తెలుపుకుంటున్నాం.	-
3.	వ్యవసాయ సర్వీసు కనెక్షన్ల కొరకు దరఖాస్తు పెట్టుకున్న రైతులచే ట్రాన్స్ ఫార్మర్ (DTR) కు గద్దె కట్టించడం పోల్ ట్రాన్స్ఫర్ చేయడం	వినియోగదారులు DDలు చెల్లించిన తరువాత నూతన వ్యవసాయ సర్వీసు కనెక్షన్ కోసం ఏర్పాటు చేయు ట్రాన్స్ ఫార్మర్ గద్దె నిర్మాణం, పోల్ మరియు

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	<p>జరుగుతుంది. అనుభవరాహిత్యముతో పోల్స్ రవాణా చేస్తున్న సందర్భంగా కామారెడ్డి జిల్లా, రామారెడ్డి మండలం, గిద్దె గ్రామంలో ఇద్దరు రైతులు మరణించడం జరిగింది. గతంలో సిద్దిపేట మరియు వరంగల్ జిల్లాల్లోను జరిగింది. అనుభవం లేని రైతులచే పోల్స్ రవాణా చేయించడం, పోల్స్ ఎత్తించడం ప్రమాదకరం. ఇప్పటి వరకు ఇటువంటి సంఘటనలు ఎన్ని జరిగాయి? డిస్కమ్ చేయాల్సిన పని రైతులచే చేయించి వారిని ప్రమాదానికి గురిచేసి చంపిన అధికారుల పై తీసుకున్న చర్యలేమిటి? భవిష్యత్ లో ఇలాంటివి జరకుండా చూడవలెను.</p>	<p>ఇతర సామాగ్రి ఎస్టిమేట్ లో చేర్చడం జరుగుతుంది. రైతులు రవాణా చేయాల్సిన అవసరం లేదు మరియు ఇతరులకు ఎలాంటి చెల్లింపులు చేయాల్సిన అవసరం లేదు.</p>
4.	<p>వ్యవసాయ వినియోగదారునికి కొత్త కనెక్షన్ ఇచ్చిన సందర్భాలలో ఉన్న శాంక్షన్ లో ఉన్న మెటీరియల్ కు, వాడిన మెటీరియల్ తేడాలు ఉంటున్నవి. కొన్ని సామానులు, వినియోగదారులచే కొనిపిస్తున్నారు. దీనిపై పారదర్శకత అవసరం. వాడిన మెటీరియల్, శాంక్షన్ అయిన మెటీరియల్ List వినియోగదారునికి ఒక కాపీ ఇచ్చి సంతకం తీసుకోవాలి. Periodical గా మెటీరియల్ వినియోగం పై 3<sup>rd</sup> పార్టీ ఎంక్వైరీ జరిపించాలి.</p>	<p>వ్యవసాయ సర్వీసు కనెక్షన్ కోసం కావలసిన ప్రతి సామాగ్రి ఎస్టిమేట్ లో వేయడం జరుగుతుంది శాంక్షన్ అయిన వెంటనే సంబంధిత అధికారి జిల్లా స్టోర్ నుండి సామాగ్రిని తీసుకోని సంబంధిత సర్వీసు పని నిమిత్తము ఉపయోగించడం జరుగుతుంది. ద్రా చేసిన సామాగ్రి వివరాలు సంబంధిత వినియోగదారునికి SMS ద్వారా తెలియపర్చడం జరుగుతుంది. వ్యవసాయ సర్వీసు పని పూర్తి అయిన తరువాత ఉన్నతాధికారులచే తనిఖీ నిర్వహించడం జరుగుతుంది.</p> <p>NPDCLలో నిర్మించిన వివిధ పనుల నాణ్యత ప్రమాణాలను తనిఖీ చేయుటకు ప్రత్యేక విభాగము ఏర్పాటు చేయడమైనది. అట్టి పనులలో నాణ్యత ప్రమాణాలు లోపించిన యెడల తగు చర్యలు తీసుకోవడం జరుగుతుంది.</p>
5.	<p>Regulation 4 of 2013 ప్రకారంగా DTR నిర్మాణ ఖర్చు డిస్కం బాధ్యత అని ఉంది. వాస్తవంగా క్షేత్ర స్థాయిలో Agricultural వినియోగదారుల అంచనా (Estimate) లో కలిపి ORC చెల్లించమని అంటున్నారు. Regulation 4 of 2013 అమలు చేయడం లేదు. కారణం తెలుపగలరు.</p>	<p>TSNPDCL పరిధిలో వ్యవసాయ కనెక్షన్ల విడుదల కోసం ఈ క్రింది విధానాన్ని పాటించడం జరుగుతుంది.</p> <ol style="list-style-type: none"> <li>1. HT లైన్, LT లైన్ మరియు DTR అవసరమైన వ్యవసాయ కనెక్షన్ కు ఎస్టిమేట్ ఖర్చులో రూ.70,000/- వరకు ఖర్చును TSNPDCL భరిస్తుంది. మిగిలిన మొత్తాన్ని వినియోగదారుడు చెల్లించాల్సి ఉంటుంది.</li> <li>2. LT లైన్ మాత్రమే అవసరమైన వ్యవసాయ కనెక్షన్ కు ఎస్టిమేట్ ఖర్చులో రూ.45,000/- వరకు ఖర్చును TSNPDCL భరిస్తుంది. మిగిలిన మొత్తాన్ని నియోగదారుడు చెల్లించాల్సి ఉంటుంది.</li> </ol> <p>తేది.26-10-2016 రోజున మరియు అంతకంటే ముందు మంజూరైన వ్యవసాయ కనెక్షన్ ఎస్టిమేట్లను పైన పేర్కొన్న విధముగా ఎస్టిమేట్ వేసి మంజూరు చేయవలసిందిగా ఆదేశించడం జరిగినది .కొత్తగా వచ్చే ప్రతి వ్యవసాయ కనెక్షన్ ఎస్టిమేట్లను మెమో నెం.సిజిఎం(సి)/జిఎం(సి)/ ఏడిఈ(సి)/</p>

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాదానాలు																																																																											
		ఏఈ(సి)/డినెం.76/16-17, తేది.01-11-2016 ప్రకారం విడుదల చేయ వలసిందిగా పేర్కొనడం జరిగినది.																																																																											
6.	Cat-V Agriculture కు సంబంధించిన 2020-21 సం.ను మరియు 2021-22 సం. ఇప్పటి వరకు గడిచిన కాలానికి సంబంధించిన ORC Circle wise వసూలు అయిన మొత్తం ఎంత?	<p>వ్యవసాయ సర్వీసుల నుండి ORC రూపంలో సేకరించిన మొత్తం సర్కిల్ వారీగా క్రింద పట్టికలో చూపించడమైనది.</p> <table border="1" data-bbox="1182 379 2116 1348"> <thead> <tr> <th>క్రమ సంఖ్య</th> <th>సర్కిల్</th> <th>ఆర్థిక సంవత్సరం 2021-22 (రూ. రూపాయలు)</th> <th>ఆర్థిక సంవత్సరం 2020-21 (రూ. రూపాయలు)</th> </tr> </thead> <tbody> <tr><td>1</td><td>హనుమకొండ</td><td>3718680</td><td>1701427</td></tr> <tr><td>2</td><td>వరంగల్</td><td>983951</td><td>780837</td></tr> <tr><td>3</td><td>జనగామ</td><td>1955974</td><td>803072</td></tr> <tr><td>4</td><td>భూపాలపల్లి</td><td>5469718</td><td>7345384</td></tr> <tr><td>5</td><td>మహబూబాబాద్</td><td>9697518</td><td>375364</td></tr> <tr><td>6</td><td>కరీంనగర్</td><td>2040412</td><td>3061037</td></tr> <tr><td>7</td><td>జగిత్యాల</td><td>802565</td><td>601161</td></tr> <tr><td>8</td><td>పెద్దపల్లి</td><td>1146178</td><td>601334</td></tr> <tr><td>9</td><td>ఖమ్మం</td><td>14835401</td><td>15516437</td></tr> <tr><td>10</td><td>భద్రాద్రి కొత్తగూడెం</td><td>30514356</td><td>30743079</td></tr> <tr><td>11</td><td>నిజామాబాద్</td><td>3731455</td><td>5001487</td></tr> <tr><td>12</td><td>కామారెడ్డి</td><td>7236268</td><td>5914153</td></tr> <tr><td>13</td><td>ఆదిలాబాద్</td><td>7776967</td><td>7631407</td></tr> <tr><td>14</td><td>నిర్మల్</td><td>4908764</td><td>6608892</td></tr> <tr><td>15</td><td>మాంచెరిల్</td><td>15636463</td><td>14477470</td></tr> <tr><td>16</td><td>ఆసిఫాబాద్</td><td>13430341</td><td>8310858</td></tr> <tr> <td colspan="2">టి.ఎస్.ఎన్.పి.డి.సి.ఎల్</td> <td><b>12,38,85,011</b></td> <td><b>10,94,73,399</b></td> </tr> </tbody> </table>				క్రమ సంఖ్య	సర్కిల్	ఆర్థిక సంవత్సరం 2021-22 (రూ. రూపాయలు)	ఆర్థిక సంవత్సరం 2020-21 (రూ. రూపాయలు)	1	హనుమకొండ	3718680	1701427	2	వరంగల్	983951	780837	3	జనగామ	1955974	803072	4	భూపాలపల్లి	5469718	7345384	5	మహబూబాబాద్	9697518	375364	6	కరీంనగర్	2040412	3061037	7	జగిత్యాల	802565	601161	8	పెద్దపల్లి	1146178	601334	9	ఖమ్మం	14835401	15516437	10	భద్రాద్రి కొత్తగూడెం	30514356	30743079	11	నిజామాబాద్	3731455	5001487	12	కామారెడ్డి	7236268	5914153	13	ఆదిలాబాద్	7776967	7631407	14	నిర్మల్	4908764	6608892	15	మాంచెరిల్	15636463	14477470	16	ఆసిఫాబాద్	13430341	8310858	టి.ఎస్.ఎన్.పి.డి.సి.ఎల్		<b>12,38,85,011</b>	<b>10,94,73,399</b>
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7.	2020-21 మరియు 2021-22 సంవత్సరములకు సంబంధించి Discom వారీగా వ్యవసాయ విద్యుత్ వినియోగము మిలియన్ యూనిట్స్	డిస్కం యొక్క వ్యవసాయ విద్యుత్ వినియోగము ఆ.సం. 2020-21 కి 7,904 ఎం.యు మరియు ఆ.సం. 2021-22 (నవంబర్ నెల వరకు) 3,829 ఎం.యు. ఇట్టి																																																																											

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	(MU)లలో ఎంత? అట్టి వినియోగానికి క్రాస్-సబ్సిడీ పోనూ ఏ టారిఫ్ ప్రకారంగా బిల్లు చేస్తున్నారు? దానిని రాష్ట్ర ప్రభుత్వం చెల్లిస్తున్నది. Agricultural Category క్రింద (గృహ, గృహేతర సబ్సిడీలు పోనూ) ఇప్పటి వరకు చెల్లించిన మొత్తం ఎంత? ఇంకా బాకీ ఉన్నది ఎంత?	<p>వినియోగానికి గౌరవ కమీషన్ వారు ఆ.సం. 2018-19 కొరకు జారీ చేసిన టారిఫ్ ఆర్డర్ ప్రకారం బిల్లు చేస్తున్నాము మరియు రాష్ట్ర ప్రభుత్వం ఆ.సం. 2018-19 నుండి ఇప్పటి వరకు చెల్లించిన మొత్తం సంవత్సరాల వారీగా ఈ క్రింద పేర్కొనడం జరిగినది.</p> <table border="1" data-bbox="1317 373 1904 526"> <thead> <tr> <th>ఆర్థిక సంవత్సరం</th> <th>రూ. కోట్లలో</th> </tr> </thead> <tbody> <tr> <td>2018-19</td> <td>2,703</td> </tr> <tr> <td>2019-20</td> <td>2,756</td> </tr> <tr> <td>2020-21</td> <td>3,285</td> </tr> </tbody> </table>	ఆర్థిక సంవత్సరం	రూ. కోట్లలో	2018-19	2,703	2019-20	2,756	2020-21	3,285
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2018-19	2,703									
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8.	<p>కోర్టుల్లో PPA లకు సంబంధించిన కేసులు ఎన్ని ఉన్నాయి? Discom లెక్క ప్రకారం అదనపు (Excess) పేమెంట్ ఇచ్చినది ఎంత? వాటి స్థితి ఏమిటి? వాటికి సంబంధించిన వరకు న్యాయవాదులకు (Advocateలకు) ఇప్పటి వరకు చెల్లించిన ఫీజు ఎంత? అట్టి కేసుల్లో Involve అయిన మొత్తం డబ్బు ఎంత? తప్పు జరిగినది అనుకొని, కోర్టుకు వెళ్లిన (Discom/Supplier) సందర్భాలకు సంబంధించిన దానిలో Internal Audit లో తేలినది ఏమిటి? బాధ్యులపై చర్యలు ఏమైనా తీసుకున్నారా? వివరాలు తెలుపగలరు. రాష్ట్ర ప్రభుత్వ విజిలెన్స్ వారికి తగిన విచారణ కొరకు పంపించారా? తెలియజేయగలరు.</p>	<p>వివిధ విద్యుత్ కొనుగోలు ఒప్పందాల పై (అత్యధిక భాగం గ్యాస్ ఆధారిత విద్యుత్ కొనుగోలు ఒప్పందాలు) వివిధ కోర్టుల్లో 104 కేసులు పెండింగ్ లో ఉన్నాయి. అంతర్గత ఆడిట్ నివేదికలలో ఎటువంటి కేసులు పేర్కొనబడలేదు కావున బాధ్యులైన వ్యక్తులపై చర్య తీసుకోవడమనేది తలెత్తదు. విచారణ కోసం రాష్ట్ర ప్రభుత్వ విజిలెన్స్ విభాగానికి ఎలాంటి కేసులు పంపబడ లేదు.</p>								
9.	<p>6 నెలలు పైగా రూ.50,000/- పైగా బిల్లు చెల్లించని ప్రభుత్వ, ప్రభుత్వేతర వర్గాల (జాబితా) List లు పెట్టినారు. చిన్న పరిశ్రమలు, చేతి వృత్తల వారిని మినహాయించి, మిగతా వారి బాకీ వసూళ్లకు మీరు చేస్తున్న ప్రయత్నం ఏమిటి? ఫార్మాట్-9, (ఎ), (బి) అంకెలను పదాలలో తెలపగలరు. ఉదా: 1535008944.52 రూ.లు లక్షలలో. ఒక నెల విద్యుత్ బిల్ చెల్లించని కారణంగా Due Date అయిన మరుసటి రోజున కట్ చేయకూడదు. వినియోగదారుడు వారి వెనుక ముందు తరాలు కూడా వినియోగదారులే. అతను డిస్కం నుండి విడిపోడు. కష్టం వచ్చిన సందర్భాల్లో డిస్కం వారు వినియోగ దారునికి మరికొంత వెసులుబాటు ఇవ్వాలి.</p>	<p>మీరు తెలిపిన విధంగా ప్రభుత్వేతర వినియోగదారుల విద్యుత్ బకాయిల జాబితా వెబ్-సైట్లో ఉంచబడ్డాయి.</p> <p>వినియోగదారుల నుండి బకాయిల వసూలులో భాగంగా వివిధ రకాలుగా వినియోగదారులలో అవగాహన పెంపొందిస్తూ మరియు బిల్లు చెల్లించని వినియోగదారుని సర్వీసును డిస్-కనెక్ట్ చేయడం జరుగుతుంది.</p> <p>ప్రభుత్వ బకాయిలకు సంబంధించి, సెప్టెంబర్ 2019 నుండి ప్రభుత్వ శాఖలు, పంచాయతీలు మరియు మున్సిపాలిటీల CC బకాయిలను క్రమం తప్పకుండా చెల్లిస్తోంది.</p> <p>వినియోగదారుని విద్యుత్ బకాయి గడువు తేది తరువాత గౌరవ కమీషన్ వారి ధరల ఉత్తర్వును అనుసరించి 15 రోజుల సమయం ఇచ్చి తదుపరి విద్యుత్ కనెక్షన్ ను డిస్-కనెక్ట్ చేయడం జరుగుతుంది.</p>								



క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాదానాలు																
10.	ట్రాన్స్ ఫార్మర్ ఫెయిల్ అయినప్పుడు గ్రామీణ కన్సూమర్స్ ను రిపేర్ సెంటర్ లకు తీసుకు వస్తే గతంలో రవాణా ఛార్జీలు చెల్లిస్తాం అని తెలిపినారు. ఎన్నింటికి చెల్లించారు? Circle wise వివరాలు ఇవ్వగలరు.	ఫెయిల్ అయిన ట్రాన్స్ ఫార్మర్ల రవాణా నిమిత్తం SPM వెహికిల్ మరియు సబ్ డివిజన్ వెహికిల్ అందుబాటులో ఉంచి ఎక్కువ శాతం తరలించడం జరుగుచున్నది. కానీ కొన్ని సమయాలలో ట్రాన్స్ ఫార్మర్ల ఫెయిల్ ట్రాన్స్ అధికమైనచో ఒకటి లేదా రెండు రోజుల జాప్యంతో ట్రాన్స్ ఫార్మర్లను డిపార్ట్ మెంట్ వెహికిల్ ద్వారానే తరలించడం జరుగుచున్నది. అతి తక్కువ సందర్భాలలో వెహికిల్ అందుబాటులో లేనిచో రైతులు తమ ఇష్టప్రకారమే ట్రాన్స్ ఫార్మర్లను రవాణా చేయుచున్నారు																
11.	CRRF విచారణలు కోవిడ్ నిబంధనలు పాటిస్తూ, క్షేత్రస్థాయిలో జరిపించాలి. అసలు CGRF అని ఫోరమ్ ఉన్నదని మెజారిటీ వినియోగదారులకు తెలియదు. ఫోరమ్ గురించి పలు విధాలుగా ప్రచారం చేయాలి. అన్ని Discom ఆఫీసులలో ప్రత్యేకంగా బోర్డులు ఏర్పాటు చేయాలి. కొన్ని ఫోరమ్ లలో 4 <sup>th</sup> Member కు సరియైన గౌరవ స్థానం ఇవ్వడం లేదు. TS NPDCL నిజామాబాద్ ఫోరమ్ సమర్థవంతంగా నెలకు 8 సార్లు విచారణ జరుపుతున్నారు. ఇది అభినందనీయం. హైకోర్టు కూడా కొన్ని రోజులు ప్రత్యక్ష విచారణ జరిపారు. TS SPDCL / TS NPDCL లోని నాలుగు ఫోరమ్ లలో గత సంవత్సరం ఎన్ని కేసులు నమోదు చేశారు. ఫోరంలలో ఎన్ని పరిష్కరించారు?	స్థానిక విద్యుత్ CGRFలచే క్రమం తప్పకుండా విచారణ సమావేశాలు నిర్వహించబడుతున్నాయి మరియు షెడ్యూల్ చేయబడిన తేదీలను స్థానిక వార్తా పత్రికలు మరియు ఎలక్ట్రానిక్ మీడియా ద్వారా ముందుగానే ప్రచురించడం జరుగుతుంది. ఆర్థిక సంవత్సరం 2020-21కి సంబంధించి CGRF కేసుల వారి వివరాలు క్రింది పట్టికలో సూచించడం జరిగింది. <table border="1" data-bbox="1137 754 1888 911"> <thead> <tr> <th></th> <th>ముట్టినవి</th> <th>పరిష్కరించినవి</th> <th>మిగిలినవి</th> </tr> </thead> <tbody> <tr> <td>CGRF-I</td> <td>180</td> <td>177</td> <td>3</td> </tr> <tr> <td>CGRF-II</td> <td>321</td> <td>313</td> <td>8</td> </tr> <tr> <td><b>మొత్తం</b></td> <td>501</td> <td>490</td> <td>11</td> </tr> </tbody> </table>		ముట్టినవి	పరిష్కరించినవి	మిగిలినవి	CGRF-I	180	177	3	CGRF-II	321	313	8	<b>మొత్తం</b>	501	490	11
	ముట్టినవి	పరిష్కరించినవి	మిగిలినవి															
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12.	CGRFలో తీర్పు వచ్చిన తరువాత అట్టి పని సరియైన సమయంలో జరగడం లేదు. తీర్పు అమలు జరిగే ఏర్పాట్లు చేయాలి. అమలు చేయకుంటే Discom స్థాయిలో వారిపై చర్యలు తీసుకోవాలి. దీనిని ఒక ఉన్నతాధికారికి అప్పగించి, ఎప్పటికప్పుడు పనులు చేయించాలి.	CGRF ఉత్తర్వులు డిస్కంలలో సత్వరమే అమలవుతున్నాయి. కార్పొరేట్ కార్యాలయం నుండి చీఫ్ జనరల్ మేనేజర్/ఆపరేషన్ ప్రధానంగా CGRFచే జారీ చేసిన ఆర్డర్ల అమలు పై ప్రత్యేక దృష్టి సారిస్తున్నారు.																
13.	Toll Free No. కు ఫోన్ చేస్తే AE గారికి, ADE గారికి తెలిపారా? అని అడిగి, వారికి చెప్పండి అని చెబుతున్నారు. ఫోన్ రాగానే ఫిర్యాదు (Complaint) వ్రాసుకొని, Complaint నెంబర్ వినియోగదారునికి ఇవ్వాలి. Toll Free No. లు అయిన 100కు, 108కు గానీ ఫోన్ చేస్తే రెస్పాన్స్ ఎలా ఉంటుందో అలాగే ఉండాలి. Toll Free No. ద్వారా Circle wise ఎన్ని ఫిర్యాదులు స్వీకరించారు? ఎన్ని పరిష్కరించారు? SoP ప్రకారంగా విద్యుత్ అంతరాయాన్ని (DTR Failures) ఇతర సేవలు సంబంధించి SoP సమయంలో పరిష్కారం చేయకుంటే	సాధారణంగా కాల్ సెంటర్ ఏజెంట్లు ఫిర్యాదులను నమోదు చేసేటప్పుడు ఫిర్యాదు సంబంధిత క్షేత్రస్థాయి సిబ్బందికి తెలియజేశారా లేదా అని విచారించి ఫిర్యాదు నమోదు చేసుకుంటారు. ఫిర్యాదు నమోదు పై వినియోగదారుడికి SMS రూపంలో ఫిర్యాదు నమోదు ID వివరాలు పొందుతారు. టోల్-ఫ్రీ నంబరుకు ఫిర్యాదు అందిన వెంటనే సమస్యను సంబంధిత అధికారులు పరిష్కరిస్తున్నారు. ప్రతి విద్యుత్ కార్యాలయం దగ్గర సంబంధిత అధికారుల ఫోన్ నెంబర్లను నోటీసు బోర్డుల ఏర్పాటు చేయడం జరిగింది.																

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాదానాలు
	<p>డిస్కం స్టాయిల్ తీసుకుంటున్న చర్యలు ఏమిటి? Toll Free No. అజమాయిషీ చేసే అధికారుల ఫోన్ నెంబర్లు ఇవ్వగలరు. అన్ని విద్యుత్ (AE, ADE, DE, SE, Bill Collection Centre మరియు సిటీజెన్ చార్జర్లలో) CGRF అడ్రెస్సు టోల్ ఫ్రీ నెంబర్లను వ్రాయించి, వాటిని ఉపయోగంలోకి తీసుకురావాలి. డిస్కం ప్రాంతంలోని అన్ని బిల్ కలెక్షన్ సెంటర్లలో ఏ ప్రాంతపు బిల్లులనైనా తీసుకునే విధంగా చర్యలు చేపట్టాలి.</p>	<p>వినియోగదారులకు చెల్లింపుల గేట్వే సౌకర్యాన్ని అందజేస్తున్నాము మరియు చెల్లింపుల గేట్వేని ఉపయోగించడం ద్వారా వినియోగదారులు ఎక్కడి నుండైనా తన బిల్లును ఎప్పుడైనా చెల్లించవచ్చు. బిల్లులను నగదు రూపంలో ఎక్కడి నుంచైనా చెల్లింపుల ప్రక్రియ పరిశీలనలో ఉంది.</p>
14.	<p>HT Category లో కాలనీలు, పంచాయతీలు, వాటికి సంబంధించిన క్యాటగిరీకి ఇంతకు ముందు రూ.లు 6.30 పైగా ఉండేది. దానిని పెంచడానికి ప్రపోజల్ గా ARR లో ప్రతిపాదించారు. అట్టి విభాగంలోనే గేటెడ్ కమ్యూనిటీకి సంబంధించినవి కూడా అందులోనే ఉన్నాయి. గేటెడ్ కమ్యూనిటీ కానీ గృహాలు, అపార్ట్మెంట్ లోని ఫ్లాట్లు/మధ్య తరగతి గృహాలకు 300 యూనిట్స్ దాటితే అత్యధిక టారిఫ్ వర్తిస్తుంది. కానీ కోట్లాది రూ.లు విలువైన విల్లాలు, గేటెడ్ కమ్యూనిటీలో ఉన్న కోట్లాది విలువైన ఫ్లాట్లలో నివసించే వారికి HT-6 క్యాటగిరీలో ఉన్న కారణంగా తక్కువ టారిఫ్ ఉన్నది. అదే ఐక్యత లేని ఎవరి (రాజకీయ/వివిధ ప్రజా సంఘాలు) ఆదరణ లేని (నోరులేని) మధ్యతరగతి వర్గాలు మాత్రమే ఎక్కువ టారిఫ్ చెల్లించాల్సి వస్తుంది. చిన్న వ్యాపారాలు గ్రామాల్లో ఇంటిలోనే వ్యాపారం చేసుకునే వర్గాల వారికి కూడా LT-II Category లో యూనిట్ కు 8 రూ.ల నుండి 11 రూ.లు చెల్లించాల్సి వస్తుంది. అదే గేటెడ్ కమ్యూనిటీలో ఉన్న వ్యాపార సంస్థలు అని, సర్వీస్ సెంటర్లు, సూపర్ మార్కెట్లు మొదలగునవి తక్కువ టారిఫ్ చెల్లిస్తున్నారు. గేటెడ్ కమ్యూనిటీ అనేది గతంలో దాదాపు లేదు. కొన్ని సం.ల నుండి కొంతమేర ప్రారంభం అయి ఇటీవల కాలంలో వినియోగం చాలా పెరుగుతుంది. కావున వారికి వేరే క్యాటగిరీ (సింగరేణి కాలరీస్ - ఇతర ఇండస్ట్రియల్ కార్మికుల కాలరీలు లాగా కాకుండా) అమలు చేయాలి. చెల్లించే స్థామత ఉన్న వారి నుండి సరియైన ధర నిర్ణయించి డిస్కంలను బలోపేతం చేయవలసిందిగా గౌరవ కమీషనర్ వారిని కోరుతున్నాం. ఆరంతస్తుల భవనాల విద్యుత్ వినియోగం కన్నా, బహుళ</p>	<p>HT-క్యాటగిరీ VI విభాగంలో వినియోగదారుల నుండి విద్యుత్ చార్జీల క్రింద ఎనర్జీ చార్జీల రూపంలో మరియు డిమాండ్ చార్జీల రూపంలో వాసులు చేయడం జరుగుతుంది. 2022-23 సంవత్సరానికి విద్యుత్ సంస్థ ప్రతిపాదించిన ధరలలో ఈ విభాగం క్రింద ఎనర్జీ చార్జీల రూపంలో యూనిట్ ఒక్కంటికి రూ.7-30 పైసలు మరియు డిమాండ్ చార్జీల రూపంలో రూ.260/KVA నెలకు వసూలు చేయుటకు ప్రతిపాదించడమైనది. పై విభాగం వినియోగదారులను HT విభాగం క్రింద జారీ చేయడం జరుగుతుంది. ఇందులో విద్యుత్ సరఫరా నష్టాలు తక్కువగా ఉండి ఈ విభాగం క్రింద సరఫరా చేసే విద్యుత్ సరఫరా వ్యయం తక్కువగా ఉంటుంది.</p>

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	<p>అంతస్తుల భవనాల వారు దాదాపు 6 నుండి 10 రేట్లు ఎక్కువ విద్యుత్ ను వినియోగించి పర్యావరణానికి విఘాతం కలిగిస్తున్నారు.</p>	
15.	<p>పర్యావరణం కారణంగా ధర్మల్ విద్యుత్ 2023 వరకు కొంత మేరకు తగ్గించుకోవాలిని ఉంది. దాని కొరకు తీసుకుంటున్న చర్యలు ఏమిటి? ప్రత్యేకంగా సోలార్ మన రాష్ట్రంలో 325 రోజులు అందుబాటులో ఉంటుంది. సోలార్ పైన గతంలో ఎన్.పి.డి.సి.ఎల్. చాలా అభివృద్ధి సాధించి అవార్డులు కూడా పొందారు. పర్యావరణాన్ని దృషిస్తే పెట్టుకొని, సంప్రదాయేతర (Renewable) ఇంధనాలతో విద్యుత్ ఉత్పత్తికి ప్రోత్సాహమివ్వాలిని ఉంది. దేశ వ్యాప్తంగా గ్రీడ్ సౌకర్యం మెరుగు పడిన, పడుచున్న అవకాశాన్ని అందిస్తున్నారని దేశంలో ఎక్కడ తక్కువ ధరకు లభ్యమవుతుందో అక్కడ కొనుగోలు చేయాలి.</p>	<p>విద్యుత్ కొనుగోలు ఒప్పందాలు ధర్మల్, సోలార్ ప్రాజెక్టులు మొదలైన వాటితో సహా 25 సంవత్సరాల కాలానికి చేయబడ్డాయి. ధర్మల్ విద్యుత్ కేంద్రాలు ప్రకటించిన విద్యుత్ లభ్యతను ఆధారంగా విద్యుత్ ను కొనుగోలు చేయవలసిన భాద్యత డిస్కంలది. సోలార్ విద్యుత్ కేంద్రాల నుండి విద్యుత్ కేవలం ఉదయం 10:00 గంటల నుండి సాయంత్రం 5:00 గంటల వరకు మాత్రమే అందుబాటులో ఉంటుంది. ఈ సోలార్ విద్యుత్ కేంద్రాలను ఇతర ధర్మల్ విద్యుత్ కేంద్రాల వలె బేస్ లోడును తీర్చడానికి ఉపయోగించ లేము. తెలంగాణ రాష్ట్రంలో సౌర సంభావ్య లభ్యతను ఉపయోగించుకోవడం కోసం, పోటీ బిడ్డింగ్లు నిర్వహించబడ్డాయి, రాష్ట్ర విభజన తర్వాత 2014 &amp; 2015 సంవత్సరాల్లో PPAల క్రింద 2500 MW సౌర సామర్థ్యం జోడించబడింది. రాష్ట్రం వెలుపల ఉన్న ISTS ప్రాజెక్ట్ల ద్వారా సౌర విద్యుత్ను ఇ-రివర్స్ బిడ్డింగ్ ద్వారా పోటీ ధరలకు కొనుగోలు చేయడానికి SECI/NTPCతో ఒప్పందాలు కుదిరాయి. 2022-23 ఆర్థిక సంవత్సరానికి అదనంగా 2000 మెగావాట్ల RE పవర్ సామర్థ్యం జోడించబడింది. TSDISCOMలు అంచనా వేయబడిన డిమాండ్ను తీర్చడానికి మరియు ఖర్చు భారాన్ని తగ్గించడానికి అత్యంత ఫలితాలిచ్చే మార్గంలో పవర్ ప్లానింగ్ను తయారు చేసి అమలు చేస్తున్నారు.</p>
16.	<p>బస్-స్టాండ్, రైల్వే స్టేషన్ల సరసన ఎయిడ్ పోర్ట్ ను చేర్చారు. బస్-స్టాండ్లు, రైల్వే స్టేషన్లో టీలు, తినుబండారాలు, ఇతర వస్తువులు రేట్లు మరియు స్టేషన్ సర్వీస్ చార్జీలు అతి స్వల్పం. ఎయిర్ పోర్టులో టీ రూ.200/- పైగా ఉంటుంది. అలా అన్నింటికీ ఎక్కువ ధరలే వసూలు చేస్తుంటారు. ఎయిర్-పోర్ట్ నిర్వహణ కొరకు ప్రతీ ఎయిర్ టికెట్ పైన కొంత చార్జీ ఉంటుంది. ఎయిర్ పోర్టులో పలు విదేశీ మద్యం షాపులు, నగల షాపులు, ఇతర దేశ, విదేశీ బ్రాండ్ల వస్తువులు అత్యధిక ధరలకు అమ్ముడయ్యే వస్తువులు ఉంటాయి. అడ్వాన్స్డ్ జింగ్ హోర్డింగ్లు రాష్ట్రంలో ఎక్కడ ఏర్పాటు చేసినా యూనిట్ కు 13 రూ.లు చెల్లించాలి. కానీ ఎయిర్ పోర్టులో హోర్డింగులపై, వ్యాపార స్థలాలకు, షాపులకు, స్టార్ హోటల్ కు</p>	



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	<p>వాటికి సంబంధించిన క్యాటగిరీల క్రిందనే, ఎయిర్ పోర్ట్ బయట టారిఫ్ ఎలా ఉందో, వీటికి కూడా టారిఫ్ ను అలాగే నిర్ణయించాలి. ఏవియేషన్ కు సంబంధించి సాంకేతిక మరియు ప్రయాణికులు వేచి ఉండే గదులకు కూడా రైల్వే స్టేషన్, బస్-స్టేషన్ల టారిఫ్ కాకుండా, కమర్షియల్ టారిఫ్ ను వర్తింపజేయాలి.</p> <p>గతంలో మేము అడిగిన ప్రశ్నకు గౌరవ ERC వారు వాస్తవ వినియోగాన్ని విభజించాలి అని ఆర్డరు జారీ చేశారు. దాని ప్రకారంగా ప్రస్తుతం రాజీవ్ గాంధీ ఇంటర్ నేషనల్ ఎయిర్ పోర్ట్ (GMR) పరిధిలో ఉంటే మొత్తం రైతుల వద్ద సేకరించిన 5400 ఎకరాలలో ఎన్ని సర్వీసులు ఉన్నాయి? అవి ఏ క్యాటగిరీ క్రింద ఉన్నాయి? వాటి వినియోగం ఎంత? వాటి టారిఫ్ మరియు స్థిర చార్జీలు (Fixed) ఎంత తెలియజేయగలరని Discomలను కోరుతూ గౌరవ కమీషన్ వారిని వాస్తవ వినియోగాన్ని మరియు వాటి ఆదాయాన్ని దృష్టిలో పెట్టుకొని టారిఫ్ నిర్ణయించి అమలు చేయించి, డిస్కమ్ ల ఆదాయాన్ని పెంచే ప్రయత్నం చేయాలనీ విన్నవించుకుంటున్నాం.</p>	
17.	<p>ఇటీవల క్షేత్రస్థాయిలో పనిచేసే తాత్కాలిక చిన్న ఉద్యోగులందరినీ పర్మినెంట్ చేయడం జరిగింది. వారి సర్వీసు సంవత్సరాలను దృష్టిలో పెట్టుకొని తగు విధంగా వారి వేతనాలను పెంచాలి.</p> <p>కేంద్ర ప్రభుత్వ ఉద్యోగులకు పి.ఆర్.సి. ప్రతి 10 సం.లకు, రాష్ట్ర ప్రభుత్వ ఉద్యోగులకు 5 సం.లకు ఒక సారి అమలు చేస్తారు. కానీ అత్యధిక వేతనాలు ఉన్న డిస్కం, ట్రాన్స్ కో, జెన్ కో ఉద్యోగులకు మాత్రం 4 సం.లకు ఒకసారి పి.ఆర్.సి. అమలు చేయడం జరుగుతుంది. రాష్ట్ర ప్రభుత్వ ఉద్యోగుల్లాగా పి.ఆర్.సి.ని 5 సం.లకు ఒక సారి అమలు చేసి, వినియోగదారుల పై భారం పెరగకుండా చూడాలని గౌరవ కమీషన్ వారిని కోరుంచున్నాము.</p>	<p>TSNPDCL లో పని చేస్తున్న ఔట్-సోర్సింగ్ ఉద్యోగులను TSNPDCLలో ఆర్డీజన్లుగా చేస్తారు. లేబర్ కమీషన్ తో ఒప్పందం కుదుర్చుకోవడం ద్వారా వారి సర్వీస్ నిబంధనలు నిర్దేశించబడ్డాయి. ఇంకా, వారి వేతనాలు మరియు ఇంక్రిమెంట్లను ఎప్పటికప్పుడు నిర్ణయించడం మరియు విడుదల చేయడం జరుగుతుంది.</p> <p>వేతన సవరణకు సంబంధించి, పవర్ యుటిలిటీస్ ప్రత్యేక సంస్థలు. పవర్ యుటిలిటీస్ లో పని చేస్తున్న ఉద్యోగులు అత్యవసర సేవలో మరియు 24x7 కాలం పని చేస్తుంటారు. ఈ క్రమంలో వారి ఉద్యోగుల వేతన సవరణ కేంద్ర/రాష్ట్ర ప్రభుత్వ ఉద్యోగులతో పోల్చబడదు. అంతే కాకుండా, 1999 లో APSEBని అన్-బండలింగ్ చేయడానికి చాలా కాలం ముందు నుండి ప్రతి నాలుగు సంవత్సరాలకు ఒక సారి వేతన సవరణ జరుగుతోంది మరియు వేతన సవరణ యొక్క కాలానుగుణతను పెంచడం వలన TS పవర్ యుటిలిటీస్ లో పని చేస్తున్న ఉద్యోగులలో అశాంతి ఏర్పడవచ్చు.</p>
18.	<p>సెంట్రల్ విజిలెన్స్ కమీషన్ మరియు స్టేట్ విజిలెన్స్ కమీషన్ కు సంబంధించిన చట్టాలు/నిబంధనలను అనుసరించి విజిలెన్స్ ను ఏర్పాటు చేసి, వినియోగదారుల పైనే గాకుండా డిస్కామ్, ట్రాన్స్ కో,</p>	<p>TSNPDCL లోని విజిలెన్స్ వింగ్ ఏ డిస్కం అధికారి నేతృత్వంలో లేదు, కానీ జాయింట్ మేనేజింగ్ డైరెక్టర్ (విజిలెన్స్)/TS TRANSCO నియంత్రణలో పని చేస్తోంది. జాయింట్ మేనేజింగ్ డైరెక్టర్ ను ప్రభుత్వం నియమించింది.</p>

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాదానాలు
	<p>జెన్ కోల అంతర్గత అవకతవకల పై కూడా నిఘా ఉంచాలి. ప్రస్తుతం సి.వి.సి. నిబంధనలకు విరుద్ధంగా కంపెనీలోని ఉన్నతాధికారులే విజిలెన్స్ కు ఆధిపత్యం వహిస్తున్నారు. దీనిని చట్టబద్ధంగా చేయగలరని గౌరవ కమీషన్ వారికి విన్నవించు కుంటున్నాం.</p>	<p>ప్రస్తుతం TSNPDCL లో చీఫ్ విజిలెన్స్ ఆఫీసర్ పోస్టును జెట్-సోర్సింగ్ ప్రతిపాదికన రిటైర్డ్ అడిషనల్ సూపరింటెండెంట్ ఆఫ్ పోలీస్ తో నింపారు మరియు ప్రభుత్వం రెగ్యులర్ చీఫ్ విజిలెన్స్ ఆఫీసర్ ను నియమించే వరకు కొనసాగుతారు.</p>
	<p>గౌరవ కమీషన్ వారికి మా సూచనలు, సలహాలను సహృదయంతో పరిశీలించి, మా సమస్యలను పరిష్కరించగలరని విన్నవించుకుంటున్నాం.</p>	

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ సతీష్ కుమార్ కాట్రగడ్డ, ప్రెసిడెంట్, ములుగు డిస్ట్రిక్ట్ రైస్ మిలైర్స్ అసోసియేషన్, ములుగు గారి సూచనలు/సలహాలకు సమాదానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాదానాలు
1.	<p>నేను మనవి చేయునది ఏమనగా ! మా రైస్ ఇండస్ట్రీ కూడా దాదాపుగా 90% మేరకు మిల్లులు కస్టమ్ మిల్లింగ్ ధాన్యమును ప్రాసెసింగ్ చేయుచున్నవి, ఈ క్రమంలో గత కొన్ని సంవత్సరాల నుండి FCI వారు మా వద్ద నుండి ఎక్స్ పోర్ట్ రకం బియ్యం తీసుకుంటున్నారు. అట్టి క్రమంలో తక్కువలో తక్కువగా 80 HPని పాలిషింగ్ యూనిట్ లోనే వాడవలసి వస్తుంది. మొత్తంగా చూసుకుంటే 100 HP దాటి పోతున్నది, 100 HP దాటినా మిల్లులు అన్నింటికీ కూడా NPDCL వారు HT సర్వీస్ గా నమోదు చేసి నెలకు కనీస బిల్లు 50,000/- రూపాయలు వేయుచున్నారు.</p> <p>ఈ పరిస్థితుల్లో మేము అభ్యర్థించేది ఏమిటంటే ఒక సంవత్సరం కాలానికి గాను కస్టమ్ మిల్లింగ్ 3 నెలల కాలం మాత్రమే నడుస్తుంది, మిగిలిన 9 నెలలు నెలకి 50,000/- రూపాయల చొప్పున 4,50,000/- రూపాయలు చెల్లించి తీవ్రంగా నష్టపోవలసి వస్తుంది. మారుతున్న పరిస్థితులకు అనుగుణంగా ఎప్పటికప్పుడు నూతన సాంకేతిక పరిజ్ఞానంతో, కొత్త యంత్రాలను అమర్చి నాణ్యత గల బియ్యాన్ని CSC వారికి గాని, FCI వారికిగాని అందజేస్తున్నాము. ఈ సంవత్సరం నుండి కేంద్ర ప్రభుత్వం ఆదేశాలతో ప్రస్తుతం FRK కెర్నల్స్ బ్లెండింగ్ చేయుటకుగాను అదనంగా కొత్త యంత్రాలను వాడవలసి వస్తుంది. కావున LT కేటగిరి-III 100 HP నుండి 150 HPకి పెంచవలసిందిగా అభ్యర్థిస్తున్నాము.</p>	<p>i) అన్ని LT కేటగిరి-III సర్వీసులు 100 HP లోడ్ వరకు టారిఫ్ ఆర్డర్ షరతుల ప్రకారం LT టారిఫ్తో మాత్రమే బిల్లింగ్ చేయబడుతున్నాయి.</p> <p>ii) ఏదైనా సర్వీసు యొక్క RMD 75 KVA/100 HPని మించి ఉంటే, 75 KVA కంటే ఎక్కువ ఉన్న అదనపు RMDని టారిఫ్ షరతుల ప్రకారం HT టారిఫ్తో బిల్లింగ్ చేయబడుతుంది. శ్రీ కె. సతీష్ కుమార్ గారు అభ్యర్థనలో సూచించిన విధంగా మొత్తం బిల్లును HT టారిఫ్తో బిల్ చేయడం లేదు.</p> <p>iii) ఒక వేళ 100 HP (75 KVA) లోడ్ ఉన్న HT పారిశ్రామిక వినియోగదారులు HT-I ఐచ్ఛిక కేటగిరిని ఎంచుకుంటే, నెలవారీ కనీస ఛార్జీలు రూ.25,800/-కి వస్తున్నాయి. కె. సతీష్ కుమార్ గారు ఆరోపించిన విధంగా రూ.50,000/-కి బదులుగా దిగువ సూచించిన విధంగా బిల్లింగ్ చేయబడుతుంది.</p> <p>(a) డిమాండ్ ఛార్జీలు (CMDలో 80%)  <math>75 \text{ KVAలో } 80\% \times \text{రూ.}80 = \text{రూ.}4,800</math></p> <p>(b) కనీస విద్యుత్ ఛార్జీలు  <math>75 \text{ KVAలో } 80\% \times 50 \text{ యూనిట్లు} \times \text{రూ.}7 = \text{రూ.}21,000</math></p> <p align="center"><b>మొత్తం = రూ.25,800</b></p> <p>iv) HT పారిశ్రామిక వినియోగదారులు కాలానుగుణ క్యాటగిరిని కూడా ఎంచుకోవచ్చు (కనీస సీజన్ వ్యవధి 4 నెలలు).</p> <p>v) ఒక వేళ సీజనల్ కేటగిరిని HT వినియోగదారులు ఎంచుకుంటే, స్థిర ఛార్జీలు &amp; కనీస విద్యుత్ ఛార్జీలు కాలానుగుణ క్యాటగిరి ప్రకారం మాత్రమే బిల్ చేయబడతాయి. అన్-సీజనల్ పీరియడ్లో ఎనర్జీ ఛార్జీలు లేకుండా కేవలం మార్జినల్ ఫిర ఛార్జీలు @ CMDలో 30% మాత్రమే బిల్ చేయబడతాయి.</p> <p>HT-I ఐచ్ఛిక కేటగిరి కోసం 150 KVA నుండి 200 KVA వరకు లోడ్ని</p>
	<p>బాయిల్డ్ ఇండస్ట్రీ చాలా గడ్డు పరిస్థితులను ఎదుర్కొంటుంది, ఎందుచేత అనగా మా జిల్లాలో దాదాపుగా ఉన్న బాయిల్డ్ ఇండస్ట్రీ ఆంతా కూడా గడచినా 2 సంవత్సరాల లోనే నిర్మాణం చేసుకోవడం జరిగింది. ప్రస్తుతం FCI వారు ఈ వానాకాలం సీజన్లో (2021-22) నుంచి బాయిల్డ్ బియ్యాన్ని ఎట్టి పరిస్థితుల్లో తీసుకోము మా వద్ద 4</p>	

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాదానాలు
	<p>సంవసరాలకు సరిపడ నిల్వలు ఉన్నవి అందుచేత బాయిల్డ్ బియ్యం మాకు అవసరం లేదని తేల్చి చెప్పినారు. ప్రస్తుతం మా జిల్లాలో అభివృద్ధి చెందిన ఇండస్ట్రీ ఆంథా కూడా FCI మీద ఆధారపడి నిర్మించుకున్నది. ఈ పరిస్థితుల్లో తమరికి కోరుచున్నది HT-1(A) ఐచ్ఛికం ప్రస్తుతం 150 KVA గా ఉన్నది దానిని 200 KVA గా మార్చగలరని అభ్యర్థిస్తున్నాము.</p>	<p>పెంచడం గౌరవనీయమైన రెగ్యులేటరీ కమిషన్ పరిధిలో ఉంది.</p>
	<p>పై రెండు విజ్ఞప్తులకు తమరు అంగీకరిస్తే ఇండస్ట్రీ కొంత కాలం మనుగడ సాగించగలదు. లేని పక్షంలో కనీస విద్యుత్ చార్జీలు కట్టలేక ఇటు బాయిల్డ్ ఇండస్ట్రీ గాని అటు 100 HP దాటినా రా-రైస్ ఇండస్ట్రీ గాని మూత పడే ప్రమాదం ఉన్నది. 21 ఫిబ్రవరి 2022న జరిగే వినియోగదారుల మీటింగ్ లో మా జిల్లా తరపున మాకు మాట్లాడే అవకాశం ఇప్పించగలరు.</p>	<p>గౌరవ కమిషన్ వారి పరిధిలోని అంశం.</p>

2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీమతి పి. మమత, గ్రామము : పత్తిపాక నెక్కొండ మండలం, వరంగల్ జిల్లా, తెలంగాణ గారి సూచనలు/సలహాలకు సమాధానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>నేను అనగా పాల్వీ మమత w/o సంతోష్ గ్రామము పత్తిపాక మండలం : నెక్కొండ, జిల్లా వరంగల్ వ్రాయునది ఏమనగా నేను బోరు భావి సర్వీస్ కనెక్షన్ కొరకు ఇవ్వగా 3 నెలలు గడిచినప్పటికిని నాకు కరెంటు లైన్ ఇవ్వడం లేదు. కావున ఈ విషయమును పలు సార్లు మండల అధికారులను విన్నవించుకున్నప్పటికీను పరిష్కరించడం లేదు. కావున మా యొక్క సమస్యను పరిష్కరించ గలరని మనవి. Transaction ID No.TTNCOC22101720300.</p>	<p>పత్తిపాక గ్రామము, నెక్కొండ మండలం, వరంగల్ జిల్లాకు చెందిన పాల్వీ మమత గారు 16.12.2021 రోజున నెం.NCOC22101720300తో మీ-సేవా లో 5 HP లోడుతో వ్యవసాయ బోరు బావి సర్వీస్ కనెక్షన్ కొరకు దరఖాస్తు చేసుకున్నారు. సర్వే పూర్తి చేసి ఎస్టిమేట్ సిద్ధం చేశాము. ఆ భూమిలో మొక్క జొన్న పంట వేశారు. మొక్కజొన్న పంట తీసిన తర్వాత పనులు పూర్తి చేసి సర్వీసు విడుదల చేస్తాము.</p>

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై**  
**శ్రీమతి L. గాయత్రి, గ్రామము : పత్తిపాక నెక్కొండ మండలం, వరంగల్ జిల్లా, తెలంగాణ గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL – సమాధానాలు
1.	<p>నేను అనగా గాయత్రీ లావుడ్య w/o తిరుమల్, గ్రామము పత్తిపాక మండలం నెక్కొండ జిల్లా వరంగల్ వాస్తవ్యురాలను నా భావికి (వ్యవసాయ) కొత్త సర్వీస్ కొరకు డి.డి. కట్టి 6 నెలల పైన అవుతుంది. కానీ ఇప్పటి వరకు ఎలాంటి పని కాలేదు. కావున చర్యలు తీస్కాని నాకు సర్వీస్ ఇప్పించగలరని మనవి. డి.డి. కట్టినప్పటి సీరియల్ నెం.TTNC022101642285.</p>	<p>పత్తిపాక గ్రామము, నెక్కొండ మండలం, వరంగల్ జిల్లాకు చెందిన లావుడ్య గాయత్రి w/o తిరుమల్ గారు వ్యవసాయ బావికి కొత్త సర్వీసు కొరకు దరఖాస్తు నెం. NCO-22101642285, తేది:21.08.2021న చేసుకొన్నారు. WBS నెం.A-2101-07-02-02-01-020 ద్వారా ఎస్టిమేట్ వేయడం జరిగినది. ఆ భూమిలో బొన్న పంట వేశారు. ఆ పంట తీసిన తరువాత పనులు పూర్తి చేయబడుతాయి.</p>

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ ఎల్. లక్ష్మీ పతి, గ్రామము : పత్తిపాక, నెక్కొండ మండలం, వరంగల్ జిల్లా, తెలంగాణ గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL – సమాధానాలు
1.	<p>మేము నెక్కొండ మండలం వరంగల్ జిల్లా మర్రికొమ్మ రైతులము నమస్కరించి వ్రాయునది ఏమనగా ! మర్రికొమ్మ గ్రామము పత్తిపాక దగ్గర పాత ట్రాన్స్ ఫార్మర్ క్రింద 30 ఎకరం మిట్ట పంటల సాగు చేస్తున్నాము. కరెంటు సరఫరాలో అవాంతరములు ఏర్పడి పూజలు కొట్టివేయడం, ట్రాన్స్ ఫార్మర్ కాలిపోవడం జరుగుతుంది. దీనిని అధికారుల దృష్టికి తీసుకుపోగా ఇంకో ట్రాన్స్ ఫార్మర్ పెట్టాలని చెప్పినారు. కానీ ఇప్పటివరకు పట్టించుకోవడం లేదు. ట్రాన్స్ ఫార్మర్ కాలినప్పుడు రైతులకు పంట నష్టం జరుగుతుంది. కావున దయచేసి అధికారులతో మాట్లాడి సమస్య పరిష్కరించ వలసినదిగా కోరుచున్నాము.</p>	<p>మర్రికొమ్మ పత్తిపాక గ్రామం, నెక్కొండ మండలం, వరంగల్ జిల్లాకు చెందిన 55-20/100 KVA ట్రాన్స్ ఫార్మర్ మీద అధిక లోడు తగ్గించుట కొరకు తేది:09.09.2021న ఎస్ఐమేట్ ఆమోదించబడింది. అదనపు ట్రాన్స్ ఫార్మర్ కొరకు గద్దె నిర్మాణ సమయంలో శ్రీ కొమల్ల శ్రీనివాస్ రెడ్డి మరియు శ్రీ మైరా లక్ష్మయ్య గార్లు నిర్మాణాన్ని వారి స్థలంలో చేపట్టినందుకు ఆటంకం తెలిపినందువలన పనులు చేపట్టలేక పోయాము. అయినప్పటికీ ట్రాన్స్ ఫార్మర్ గద్దె నిర్మాణ కొరకు ఇతర స్థలము ఎన్నుకోవడం జరిగింది. పంట తీసిన తరువాత పని పూర్తి చేస్తాము.</p>

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ లావుడ్య రామ, గ్రామము : పత్తిపాక, నెక్కొండ మండలం, వరంగల్ జిల్లా, తెలంగాణ గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL – సమాధానాలు
1.	<p>నేను లావుడ్య రామ s/o చిన్న వెంకటి గ్రామము పత్తిపాక, మండలం నెక్కొండ, వరంగల్ జిల్లా బావి కొరకు డి.డి. తీసి 25 సంవత్సరములు కావస్తున్నా ఇప్పటి వరకు ఎలాంటి కరెంట్ కనెక్షన్ ఇవ్వలేదు. పలు మార్లు మండల అధికారుల దృష్టికి తీసుకు వెళ్లిన ఎలాంటి ప్రయోజనం లేదు. కావున నాకు కనెక్షన్ ఇప్పించ గలరని మనవి.</p>	<p>పత్తిపాక గ్రామం, నెక్కొండ మండలం, వరంగల్ జిల్లాకు చెందిన లావుడ్య రామ w/o చిన్న వెంకటి, వ్యవసాయ భావి సర్వీసుకు అప్పుడు ఉన్న నిబంధనల ప్రకారం 01.11.1996న SC No.12214-00137తో విడుదల చేయడం జరిగింది. లావుడ్య రామ కష్టమర్ చార్జీల క్రింద రూ.1,920/- డిసెంబర్ 2021 నెలలో చెల్లించారు.</p>



**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదనలు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ నాయిని ఎల్లారెడ్డి, s/o కిష్టారెడ్డి, R/o శాతాపూరం గ్రామము, పాలకుర్తి మండలం, జనగామ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>నా యొక్క ఇంటి ఆవరణలో ఇంటికి ఆనుకొని 11 KV SS-Iలో శాతాపూరం గ్రామము, పాలకుర్తి మండలం, జనగామ జిల్లాలో లైను వెళ్ళింది నా ఇంటిలో వివిధ పండ్ల మొక్కలు హరిత హారం మొక్కలు నాటియున్నవి. వాటికి నా యొక్క ఇంటికి చాలా ఇబ్బందిగా వుంది, ఇంతకు ముందు మా మొక్క దుద్దె వర్షం వచ్చినప్పుడు చెట్ల ద్వారా కరెంటు షాక్ కొట్టినది. దానికి గాను మన కరెంటు AE గారికి లెటరు పెట్టినాము కానీ ఆతను పిఫింగ్ డి.డి. కట్టమన్నారు. దానికి నా దగ్గర అంత డబ్బు లేదు కనుక నా యొక్క ఇంటిని కరెంటు లైనును పరిశీలించి ఆ యొక్క లైనును మా ఇంటి ముందు నుండి తీయించగలరు. అట్లా తీసినచో మా గ్రామానికి వీధి లైట్లు మెయిన్ రోడ్ లో లేవు. లైను లేనందున అటు లైను వస్తుంది. మా గ్రామానికి వీధి లైట్లుగా పని చేస్తాయి. ఇంతకు ముందు AE గారికి ఇచ్చిన లెటరు జత పర్చుచున్నాను.</p>	<p>11 KV లైన్ను మార్చడానికి మరియు పిఫింగ్ ఎస్టిమేట్ సిద్ధం చేయడానికి శ్రీ నాయిని ఎల్లారెడ్డి గారు సమ్మతి లేఖను సమర్పించి చెల్లింపులు జరిపిన తరువాత ఎస్టిమేట్ వేసి పనులు చేపట్టబడును.</p>
2.	<p>నాకు ఇంటి కరెంటు బిల్లులు 2 నెలలకు ఒక సారి తీస్తున్నారు దానిని నెలకు ఒక సారి తీయమని RTI ద్వారా కోరడం జరిగింది. దానికి ఇంతవరకు రిపై లేదు. అది కూడా జత పరచుచున్నాను. నాకు కరెంటు బిల్లు ఎక్కువగా వస్తుంది.</p>	<p>TSNPDCL నిబంధనల ప్రకారం, గ్రామీణ ప్రాంత సర్వీసులు 2 నెలల సైకిల్కు ఒక సారి మాత్రమే బిల్లులు ఇవ్వబడతాయి మరియు పాలకుర్తి మండలం శాతాపూర్ గ్రామం గ్రామీణ ప్రాంతంలోకి వస్తుంది.</p>

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై**  
**శ్రీ నాయిని ఎల్లా రెడ్డి, భారతీయ కిసాన్ సంఘ్ రాష్ట్ర కార్య వర్గ సభ్యులు గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>శాతపురం గ్రామం, పాలకుర్తి మండలం, జనగామ జిల్లాలోని రైతులు శ్రీ చొప్ప ఆంజనేయులు, పెద్దపురం, తొర్రూరు (2) శ్రీ చొప్ప రమేష్, పెద్దపురం, తొర్రూరు గారు 15 సంవత్సరముల క్రింద శాతపురం శివారులో 132 /S .No . 4 ఏకారముల భూమి కొని వ్యవసాయ బోరు వేసుకొని సాంక్షన్ తీసుకొని ప్రతి సంవత్సరం కరెంటు బిల్లు కట్టుచున్నారు. వారికి 2 పోల్స్ దూరంలో బోరు వుంది. దానికి సర్వీస్ వైర్ పై మోటారు నడుపుకుంటున్నారు. వారికి కర్రలు నాటడం వలన పక్క రైతులు ఇబ్బందులు పెట్టుచున్నారు. గాలి దుమారం వచ్చినప్పుడల్ల వారి ఇబ్బందులు వర్షనాతీతంగా వుంది. కనుక అట్టి పేద రైతులకు రెండు కరెంటు పోల్స్ వేసి వాళ్ళ జీవితాల్లో వెలుగు నింపగలరు. వాళ్ళు ఎన్ని సార్లు విన్నవించుకున్నా అధికారులు స్పందించడం లేదు. వాళ్ళను పోల్స్ వైర్లు కొనుక్కో మంటున్నారు. వారికి ఆ స్టోమత లేదు కనుక వారికి న్యాయం చెయగలరు.</p>	<p>వ్యవసాయ సర్వీసు SC నెం.14121-00203 శ్రీమతి నాయిని సునీత పేరు మీద చాలా కాలం క్రితం అప్పటి నిబంధనల ప్రకారం రిలీజ్ అయినది. ప్రస్తుతము కావలసిన LT పోల్స్ ని వ్యవస్థ బలోపేత పథకం (System Strengthening Network Scheme) ద్వారా చర్యలు తీసుకోబడును.</p>

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదనలు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ నాయిని ఎల్లారెడ్డి, భారతీయ కిసాన్ సంఘ్ రాష్ట్ర కార్య వర్గ సభ్యులు గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>శాతపురం గ్రామములో పాలకుర్తి మండలం జనగామ జిల్లాలో మా గ్రామ ప్రారంభం దుర్గామాత గుడి నుండి గ్రామ అంతం పూర్తి వరకు పోల్స్ లైను లేక రాత్రి పూట గ్రామము అంధకారంలో ఉంది. బజారులలో లైట్లు వుండి గ్రామ మొదలు, చివరి వరకు లైను లేని కారణంగా లైట్లు వేయలేక పోతున్నారు. కనుక అట్టి లైను వేసి మా గ్రామాన్ని చీకటి నుండి విముక్తి చేయగలరు.</p>	<p>గ్రామ పంచాయతీ సర్పంచ్ గారినిలైన్ ఏర్పాటుకు చెల్లింపు చేయడానికి సమ్మతి లేఖ ఇవ్వాలని ఇప్పటికే అభ్యర్థించాము. అయితే గ్రామ పంచాయతీ సర్పంచ్ నుండి ఎటువంటి సమ్మతి రాలేదు. అయినప్పటికీ బడ్జెట్ లభ్యతను బట్టి రోడ్డు వెంబడి లైన్ వేయబడును.</p>
2.	<p>అదే విధంగా మెయిన్ రోడ్డులో ఇండ్లు ఉన్న రైతులు వారి వారి ఇండ్లకు కరెంటును 3, 4, పోల్స్ దూరం నుండి సర్వీస్ వైర్ పై తీసుకో వలసి వస్తుంది కనుక పరిశీలించి వారికి ఆ ఇబ్బంది నుండి విముక్తి చేయగలరు.</p>	<p>పరిశీలించి పరిష్కారం చేయబడును.</p>

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై**  
**శ్రీ నాయిని ఎల్లా రెడ్డి, భారతీయ కిసాన్ సంఘ్ రాష్ట్ర కార్య వర్గ సభ్యులు గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>శాతపురం గ్రామములో SC కాలనీ సెంటర్లో ఇండ్ల మధ్యలో SS-I ట్రాన్స్ఫార్మర్ ఉంది. దాని పై ఓవర్ లోడ్ కారణంగా ప్రతి సారి ట్రాన్స్ఫార్మర్ కాలటం మరియు ఇండ్ల మధ్యలో ఉండటం వలన గ్రామ దళిత ప్రజలు చాలా ఇబ్బంది పడుచున్నారు. భయ భ్రాంతులకు గురి అవుచున్నారు. అట్టి ట్రాన్స్ఫార్మర్ ను మార్చమని ఎన్ని సార్లు విన్నవించుకున్నా అట్టి ట్రాన్స్ఫార్మర్ ను మార్చటం లేదు. అది జనాల మధ్య ఉండటం వలన పశులు, మేకలు, జనాలకు చాలా సార్ల పాక్ కొట్టడం జరిగింది దానిని వెంటనే అక్కడ నుండి పిష్టే చేసి మా యొక్క దళిత బంధులకు భయాందోళనల నుండి విముక్తి చేయగలరని నా యొక్క మనవి. ఫోటో జతపరచుచున్నాము.</p>	<p>శాతపురం గ్రామములో SC కాలనీ సెంటర్లో ఇండ్ల మధ్యలో SS-I/100 KVA ట్రాన్స్ఫార్మర్ ఉన్నది. SS-I/100 KVA ట్రాన్స్ఫార్మర్ పిష్టింగ్ కొరకు ఎస్టిమేట్ WBS నెం.D-2001-08-02-02-03-002 తో శాంక్షన్ అయినది మరియు డిమాండ్ నోటీసు గ్రామా పంచాయితీ సర్పంచ్ గారి ఇవ్వడం జరిగినది. చెల్లింపులు జరిపిన పిమ్మట పనులు చేపట్టడం జరుగుతుంది. ప్రమాదాల నివారణ చర్యలు చేపట్టడం జరిగినది.</p>

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ E. సోమాజీ, శాతపురం గ్రామం, పాలకుర్తి మండలం, భారతీయ కిసాన్ సంఘ్, జనగామ జిల్లా గారి సూచనలు/సలహాలకు సమాదానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాదానాలు
1.	<p>శాతపురం గ్రామం పాలకుర్తి మండలం జనగామ జిల్లాలో ఉన్న SC కాలనీ గ్రామం మధ్యలో SS-I ట్రాన్స్ఫార్మర్ ఉన్నది. గత 20 సంవత్సరముల నుండి తీవ్ర ఇబ్బందులు పడుచున్నాము. వర్ష కాలంలో ఉరుములు, మెరుపులు వచ్చినప్పుడు అక్కడ నివసిస్తున్న ప్రజలు తీవ్ర ఇబ్బందులకు గురి అవుచున్నారు. సుమారుగా 20 మంది గాయ పడ్డారు మరియు గొర్రెలు, బ్రెలు, మేకలు కూడా విద్యుత్ షాక్ కు బలి అయిపోయినాయి. కావున మా గ్రామం యందు దయతలచి ఊరి మధ్యలో ఉన్న SS KV : 100 ట్రాన్స్ఫార్మర్ ను తొలగించి ఊరి బయటకు వేయగలరని మా గ్రామ ప్రజల మనవి. దీని ఫోటో జత పరుస్తున్నాను.</p>	<p>i) శాతపురం గ్రామం పాలకుర్తి మండలం జనగామ జిల్లాలోని SC కాలనీ గ్రామం మధ్యలో ఉన్న SS-I 100 KVA DTR పిఫ్లింగ్ ఎస్టేమేట్ WBS No.D-2001-08-02-02-03-002 ద్వారా మంజూరు చేయబడింది మరియు గ్రామ పంచాయతీ సర్పంచ్ కి డిమాండ్ నోటీసు తేది:21.07.2020 జారీ చేయబడింది.</p> <p>ii) గ్రామ పంచాయతీ నుండి చెల్లింపులు జరిగిన తరువాత పని చేపట్టడం జరుగుతుంది.</p> <p>iii) అయినప్పటికీ ప్రమాదాలు జరగకుండా నివారణ చర్యలు తీసుకున్నాము.</p>
2.	<p>శాతపురం గ్రామం పాలకుర్తి మండలం జనగామ జిల్లా శాతపురం గ్రామంలో మెయిన్ రోడ్ అనగా బి.టి రోడ్ వీధి లైట్స్ లేవు. కావున గ్రామం వైకుంఠధామం నుండి ఊరి చివరి వరకు అనగా పోచమ్మ గుడి వరకు వీధి దీపాలు వేయించి ఊరికి వీధి లైట్స్ వెలిగే విధంగా చేయగలరని మా గ్రామ ప్రజల మనవి మరియు గ్రామ వీధిలో లూజు పోల్స్ అక్కడ అక్కడ వేయ వలసి వున్నది. అదే విధంగా అంగన్ వాడి కేంద్రము II నుండి ఆయితని శ్రీనివాస్ పశువుల కొట్లము వరకు సింగల్ పేజ్ లైన్ మంజూరు చేయగలరు. దానికి సంబంధించిన ఫోటో జతపర్చునైనది.</p>	<p>శాతపురం గ్రామం మెయిన్ రోడ్ అనగా బి.టి రోడ్ వరకు, గ్రామం వైకుంఠధామం నుండి ఊరి చివరి వరకు అనగా పోచమ్మ గుడి వరకు వీధి దీపాల కొరకు మరియు అంగన్ వాడి కేంద్రము-II నుండి ఆయితని శ్రీనివాస్ పశువుల కొట్లము వరకు సింగల్ పేజ్ లైన్ ఎస్టేమేషన్ కొరకు సమ్మతి పత్రాన్ని సమర్పించాలని గ్రామ పంచాయతీ సర్పంచ్ కు ఇదివరకే తెలియజేయడమైనది. కానీ గ్రామ పంచాయతీ సర్పంచ్ సమ్మతి ఇవ్వడానికి మరియు అవసరమైన మొత్తాన్ని చెల్లించడానికి నిరాకరించారు. మధ్యస్థ స్థంబాల ఏర్పాటు కోసం శాతపురం గ్రామాన్ని పూర్తిగా తనిఖీ నిర్వహించి రెండు ప్రదేశాలు గుర్తించి రెండు పోల్స్ ని ఏర్పాటు చేశాము.</p>
3.	<p>శాతపురం గ్రామం పాలకుర్తి మండలం జనగామ జిల్లాలోని నాయిని ఎల్లారెడ్డి గారి ఇంటి మధ్యలో వున్న కరెంట్ స్తంభం లైనును తొలగించి మెయిన్ రోడ్ కు పిఫ్లీ చేయగలరు. అదే విధంగా మెయిన్ రోడ్ లైనును కొత్తగా వేయగలరు. కావున మా యందు దయ తలచి మంజూరి చేయగలరని నా యొక్క మనవి. సంబంధిత ఫోటో జత పరచనైనది.</p>	<p>శ్రీ నాయిని ఎల్లారెడ్డి గృహ ప్రాంగణంలో ఉన్న స్తంభాన్ని ప్రధాన రహదారి వైపుకు మార్చడం కోసం పిఫ్లింగ్ ఎస్టేమేషన్ తయారీ కోసం సమ్మతి లేఖను సమర్పించాలని తెలియజేయడం జరిగింది. శ్రీ నాయిని ఎల్లారెడ్డి గారు సమ్మతి లేఖను ఇవ్వడానికి అంగీకరించారు. చెల్లింపులు జరిగిన తరువాత పని చేపట్టడం జరుగుతుంది.</p>

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదనలు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ ఎర్ర మల్లేష్. పసరమడ్ల గ్రామం, జనగామ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>పసరమడ్ల గ్రామ శివారులో 393 లో ఏర్పాటు చేసిన ట్రాన్స్ ఫార్మరుకు అధిక లోడు కనెక్షన్లు ఇవ్వడం వలన బోరు మోటార్లు తరుచుగా కాలిపోవుచున్నందున తగు చర్యలు తీసుకొనుటకై తమతో విజ్ఞప్తి.</p> <p>పై విషయానుసారంగా తమరికి మనవి చేయునది ఏమనగా!</p> <p>నేను అనగా ఎర్ర మల్లేష్, తండ్రి: నర్సయ్య, వృత్తి: వ్యవసాయం నివాసం గ్రామం: పసరమడ్ల, మండలం జనగామ, జిల్లా జనగామ నివాసుడను. మా పసరమడ్ల గ్రామములోని సర్వే నెం.393లో ఏర్పాటు చేసిన ట్రాన్స్ ఫార్మర్ నెం.2513891, తేదీ:26.09.2012, జి.నెం.120048829, 25 KVA గల దాని పై ప్రస్తుతం 7 బోరు మోటార్లు ఉన్నవి. కేవలం 5 HP బోరు మోటార్లు 5 నడువవలసి ఉండగా అదనంగా భిన్నంగా 7 మోటార్లు 3-5 HP నడుస్తుండగా 4 - 7.5 మోటార్లు నడుస్తున్నవి. తద్వారా లోడు ఎక్కువ అయిన మా మోటారు కాలిపోవుచున్నది. గత 2 సంవత్సరాలుగా లైన్ మేన్ కు ఫిర్యాదు చేసిన ఎలాంటి చర్యలు తీసుకోకపోవడంతో మేము మా యొక్క పంటలకు నష్టం వాటిల్లుతున్నది.</p> <p>కావున దయామయులైన మీరు ఇట్టి విషయంలో చొరవ తీసుకొని తగు న్యాయం వేడుకొంటున్నాము.</p>	<p>పసరమడ్ల గ్రామంలోని సర్వే నెం.393లో ఏర్పాటు చేసిన 25 KVA ట్రాన్స్ ఫార్మర్ మీద 5 అధికారిక సర్వీసులు ఉన్నాయి. ఇందులో 2 సర్వీసులు 7.5 HP లోడుతో నడుపుచున్నారు. 3 సర్వీసులు 5 HPతో నడుపుచున్నారు. అదనంగా 2 సర్వీసులు అనధికారంగా ఈ ట్రాన్స్ ఫార్మర్ మీద నడుపుచున్నారు. దీనివలన ప్రస్తుతమున్న 25 KVA ట్రాన్స్ ఫార్మర్ మీద లోడు ఎక్కువ అయినది. ఇటీవల 2 అనధికార సర్వీసులకు DDలు కట్టడం జరిగినది మరియు ట్రాన్స్ ఫార్మర్ కెపాసిటీ 25 KVA నుండి 63 KVAకు పెంచడానికి ఎఫ్ఐమేట్ WBS No.T-2101-08-01-01-02-027 వేయడం జరిగింది. ట్రాన్స్ ఫార్మర్ కెపాసిటీ పెంచి అనధికార సర్వీసులు క్రమబద్ధీకరిస్తాము. విద్యుత్ సరఫరా లోపం వలన ఎలాంటి నష్టం రైతులకు వాటిల్లలేదు.</p>



**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ శశిభూషణ్ కాచే, అడ్వకేట్, స్టేట్ కో-ఆర్డినేటర్, కిసాన్ కాంగ్రెస్, # 8-55, నడివీధి, మంథని జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు																																															
1.	<p>విద్యుత్ ప్రమాదాల నివారణకు పటిష్టమైన చర్యలు చేపట్టాలి, రక్షణ వ్యవస్థను బలోపేతం చేసి ప్రమాదాలను నివారించాలి. చేతి వృత్తుల వారికి 250 యూనిట్ల వరకు ఉచితంగా అందించాలి. (కొరశాలలు, ఇన్స్టి పావుల మాదిరిగా) గత మూడు సంవత్సరాలుగా విద్యుత్ ప్రమాదాల వివరాలు పంపిణీ సంస్థల వారిగా ఇవ్వగలరు. విద్యుత్ బిల్లుల చెల్లింపు సామర్థ్యం ఉండి దీర్ఘ కాలికంగా పంపిణీ సంస్థలకు మొండి బకాయిల వసూళ్ల విషయమై పంపిణీ సంస్థలు తీసుకున్న చర్యలు, నివేదిక.</p>	<p>మా సిబ్బంది తరచూ క్షేత్ర స్థాయిలో తనిఖీ చేసి లూజు లైన్లను గుర్తించి పునరుద్ధకరించడం మరియు అవసరమున్న చోట మధ్యస్థ స్తంభాలు ఏర్పాటు చేయడం జరుగుతుంది. వివిధ పథకాలలో లూజు లైన్లను గుర్తించి పునరుద్ధకరించడం జరుగుతుంది. విద్యుత్ ప్రమాదాల అరికట్టేందుకు ఎప్పటికప్పుడు పటిష్టమైన చర్యలను చేపట్టడం జరుగుతుంది. చేతి వృత్తుల వారికి 0-250 యూనిట్ల వరకు (కొరశాలలు, ఇన్స్టి పావుల మాదిరిగా) ఉచితంగా అందించడమనేది ప్రభుత్వ పరిధిలోని విధానపరమైన అంశము.</p> <table border="1" data-bbox="705 550 2110 869"> <thead> <tr> <th rowspan="2">ఆర్థిక సంవత్సరం</th> <th colspan="3">ప్రమాదాల వల్ల మరణించిన సంఖ్య</th> <th colspan="4">చెల్లించిన ఎక్స్-గ్రేషియా</th> </tr> <tr> <th>మనుషులు</th> <th>పశువులు</th> <th>ప్రాణ నష్టం కాని ప్రమాదాలు</th> <th>మనుషులు</th> <th>చెల్లించిన ఎక్స్-గ్రేషియా</th> <th>పశువులు</th> <th>చెల్లించిన ఎక్స్-గ్రేషియా</th> </tr> </thead> <tbody> <tr> <td>2018-19</td> <td>348</td> <td>1063</td> <td>135</td> <td>270</td> <td>1181.5</td> <td>760</td> <td>362.925</td> </tr> <tr> <td>2019-20</td> <td>476</td> <td>1080</td> <td>84</td> <td>211</td> <td>1058</td> <td>580</td> <td>284.925</td> </tr> <tr> <td>2020-21</td> <td>460</td> <td>974</td> <td>59</td> <td>351</td> <td>1763</td> <td>726</td> <td>355.590</td> </tr> <tr> <td><b>మొత్తం</b></td> <td><b>1284</b></td> <td><b>3117</b></td> <td><b>278</b></td> <td><b>832</b></td> <td><b>4002.5</b></td> <td><b>2066</b></td> <td><b>1003.440</b></td> </tr> </tbody> </table> <p>ప్రైవేట్ సర్వీసులకు సంబంధించిన విద్యుత్ బకాయిలు: డిస్కనెక్ట్ తేది ముగిసిన తర్వాత సేవలు డిస్కనెక్ట్ చేయబడుతున్నాయి మరియు డిస్కనెక్ట్ చేసిన తర్వాత వినియోగదారుడు (3) నెలలలోపు బకాయిలు చెల్లించడంలో విఫలమైతే, వినియోగదారులకు GTCs నిబంధనల ప్రకారం ఉపవాక్య సంఖ్య: 5.9.4 అగ్రిమెంట్ రద్దు నోటీసులు జారీ చేయబడతాయి. దీర్ఘకాలంగా పెండింగ్లో ఉన్న బకాయిలకు రెవెన్యూ రికవరీ చట్టం యొక్క నిబంధనలు కూడా వర్తింప చేయబడుతున్నాయి. ప్రభుత్వ శాఖ బకాయిలకు సంబంధించి, తెలంగాణ ప్రభుత్వం సూచనల మేరకు ప్రభుత్వ శాఖలు అక్టోబర్ 2019 నుండి క్రమం తప్పకుండా CC ఛార్జీలను చెల్లిస్తున్నారు. రాష్ట్ర ప్రభుత్వం ప్రతి నెల LIS, HMWS మరియు మిషన్ భగీరథ సర్వీసుల CC బిల్లులకు టారిఫ్ సబ్సిడీతో పాటు నిధులు విడుదల చేస్తోంది.</p>	ఆర్థిక సంవత్సరం	ప్రమాదాల వల్ల మరణించిన సంఖ్య			చెల్లించిన ఎక్స్-గ్రేషియా				మనుషులు	పశువులు	ప్రాణ నష్టం కాని ప్రమాదాలు	మనుషులు	చెల్లించిన ఎక్స్-గ్రేషియా	పశువులు	చెల్లించిన ఎక్స్-గ్రేషియా	2018-19	348	1063	135	270	1181.5	760	362.925	2019-20	476	1080	84	211	1058	580	284.925	2020-21	460	974	59	351	1763	726	355.590	<b>మొత్తం</b>	<b>1284</b>	<b>3117</b>	<b>278</b>	<b>832</b>	<b>4002.5</b>	<b>2066</b>	<b>1003.440</b>
ఆర్థిక సంవత్సరం	ప్రమాదాల వల్ల మరణించిన సంఖ్య			చెల్లించిన ఎక్స్-గ్రేషియా																																													
	మనుషులు	పశువులు	ప్రాణ నష్టం కాని ప్రమాదాలు	మనుషులు	చెల్లించిన ఎక్స్-గ్రేషియా	పశువులు	చెల్లించిన ఎక్స్-గ్రేషియా																																										
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2.	<p>విద్యుత్ పంపిణీ సంస్థలు విద్యుత్ వినియోగదారుల పై ఛార్జీల పెంపు ప్రతిపాదనల కారణంగా వినియోగదారులు ప్రత్యంన్యాయ వ్యవస్థల పై ఆధారపడితే పంపిణీ సంస్థలు</p>	<p>ఆర్థిక సంవత్సరం 2016-17 తరువాత విద్యుత్ ఛార్జీలను పెంచలేదు మరియు అన్ని రకాల వ్యయాలు పెరిగినందున ఛార్జీల పెంపు అనివార్యమైనది.</p>																																															

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL – సమాధానాలు
	<p>సంక్షోభంను ఎదుర్కొనే            అవకాశం ఉంది. కావున చార్జీల            పెంపు ప్రతిపాదనను            ఉపసంహరించుకోవాలి.</p>	



**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ దుద్దిళ్ల శ్రీధర్ బాబు, శాసన సభ్యులు, 024-మంథని అసెంబ్లీ నియోజకవర్గం, Q.No.112, న్యూ MLA క్వార్టర్స్, ఆదర్శ నగర్, హైదరాబాద్ గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	బిపిఎల్ కుటుంబాలకు, షెడ్యూల్డ్ కులాలు, షెడ్యూల్డ్ తెగలకు చెందిన వారికి 200 యూనిట్ల వరకు ఉచిత విద్యుత్ అందించాలి. రాష్ట్ర ప్రభుత్వం సబ్సిడీల క్రింద చెల్లించాల్సిన మొత్తాన్ని క్రమం తప్పకుండా ఆర్థిక సంవత్సరం లోపే చెల్లించాలి.	ప్రస్తుతం షెడ్యూల్డ్ కులాలు మరియు షెడ్యూల్డ్ తెగలకు చెందిన వారి యొక్క గృహ వినియోగానికి సంబంధించి 0-101 యూనిట్ల వరకు ప్రభుత్వం రియంబర్స్ మెంట్ చెల్లిస్తుంది. 0-200 యూనిట్ల వరకు ఉచితంగా సరఫరా చేయడం అనే అంశం రాష్ట్ర ప్రభుత్వ పరిధిలోని విధానపరమైన నిర్ణయం.
2.	క్రమం తప్పకుండా గడువులోపులోగా విద్యుత్ పంపిణీ సంస్థలు సమగ్ర ఆదాయ ఆవశ్యకత సమాచారం (ARR) కమీషన్ కు సమర్పించడంలో జాప్యానికి గల కారణాలు.	డిస్కంలు ఆర్థిక సంవత్సరం 2018-19 వరకు ప్రతి సంవత్సరం సమగ్ర ఆదాయ ఆవశ్యకత నివేదికలను సమర్పించడం జరిగినది. కానీ ఆర్థిక సంవత్సరం 2019-20 నుండి ఆర్థిక సంవత్సరం 2021-22 సంవత్సరాలకు సంబంధించిన సమగ్ర ఆదాయ ఆవశ్యకత మరియు ప్రతిపాదిత ధరల నివేదికలను తెలంగాణ అసెంబ్లీ ఎన్నికలు 2018 నియమావళి, లోక సభ ఎన్నికలు 2019 నియమావళి, ICAD నుండి LIS సమాచార జాప్యం వలన, వార్షిక ఖాతాలు (Annual Accounts) సకాలంలో పూర్తి చేయక పోవడం వలన, మున్సిపల్ ఎన్నికల నియమావళి వలన, కేంద్ర విద్యుత్ మంత్రిత్వ శాఖ వారి ధరల హేతుబద్ధీకరణ చేయడానికి, కోవిడ్-19 లాక్-డౌన్ వలన మరియు GHMC ఎన్నికల నియమావళి వలన సకాలంలో సమగ్ర ఆదాయ ఆవశ్యకత నివేదికలను సమర్పించ లేదు.

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ డబ్బు రవి, జగ్గాసాగర్ గ్రామం, మెట్ పల్లి మండలం, జగిత్యాల జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL – సమాధానాలు
1.	<p>శ్రీరాంసాగర్ ప్రాజెక్ట్ నుండి వచ్చే వరద కాల్యలో మోటార్లు పెట్టుకునే వారికి విద్యుత్ కనెక్షన్ ఇవ్వడం లేదు.</p> <p>ప్రభుత్వము కాలేజీలకు లాంటి ఎన్నో లిఫ్ట్ ఇరిగేషన్ల ద్వారా వ్యవసాయ రంగానికి నీరు ఇస్తుంది. రైతులు ప్రభుత్వము పై ఆధార పడకుండా తమ స్వంత ఖర్చులతో మోటార్లు ఏర్పాటు చేసుకుంటుంటే అనుమతి ఇవ్వకపోవడం విచార కరం. రైతులు తమ పంట రక్షణ కోసం నీటిని ఎక్కడ నుండైనా తీసుకోవడానికి “క్రాప్ ప్రొటెక్షన్ అనే చట్టం కూడా ఉంది. రైతు యొక్క స్వయం ఉపాధి నిమిత్తము నూతన విద్యుత్ కనెక్షన్లను అనుమతించాలని కోరుతున్నాము.</p>	<p>సంస్థ నిబంధనల ప్రకారం రైతులు వారికి చెందిన సర్వే. నెం. గల భూమి లో బోరు లేదా బావులకు సంబంధించిన మోటార్ కనెక్షన్ కోసం మీసేవ కేంద్రంలో రెవెన్యూ అధికారులు ధృవీకరించిన పత్రం తో దరఖాస్తు చేసుకున్న వారికి వ్యవసాయ విద్యుత్ కనెక్షన్ ఇవ్వడం జరుగుతుంది మరియు ప్రభుత్వ పథకములైన CI WELLS, CLDP, IJP &amp; గిరివికాస్ ద్వారా మంజూరైనటువంటి బోర్ బావులకు కూడా విద్యుత్ కనెక్షన్ ఇవ్వడం జరుగుతుంది.</p> <p>శ్రీరాంసాగర్ నుండి వచ్చే వరద కాల్యలో మోటార్లు పెట్టుకునే వారికి విద్యుత్ కనెక్షన్ లు ఇవ్వాలి అని ఎటువంటి ఆదేశాలు లేవు కావున విద్యుత్ కనెక్షన్లు ఇవ్వడం లేదు. ఒకవేళ భవిష్యత్తులో విధానపరమైన నిర్ణయము తీసుకున్నచో విద్యుత్ కనెక్షన్లు ఇవ్వగలం.</p> <p>ప్రస్తుతం గోదావరి నది పైన ప్రభుత్వం నడుపుతున్న ఎత్తిపోతల పథకం కు సంబంధించిన సర్వీసులకు మాత్రమే విద్యుత్ కనెక్షన్లు ఇవ్వడం జరిగింది.</p> <p>జగిత్యాల జిల్లాలో వరద కాలం పైన రాంపూర్ గ్రామం వద్ద సర్వీస్ నెం. JGL-105 హెచ్. టీ క్యాటగిరీ-IV(A)లో 8మెగా వాట్ల కెపాసిటీతో మరియు రాజేశ్వర్రావుపేట్ గ్రామం వద్ద సర్వీస్ నెం. JGL-109 హెచ్. టీ క్యాటగిరీ-IV(A)లో 8మెగా వాట్ల కెపాసిటీతో కాలేజీలకు ఎత్తిపోతల పథకం కింద 2 విద్యుత్ కనెక్షన్లు ఇవ్వడం జరిగింది.</p>
2.	<p>విద్యుత్ శాఖ వారు ఏర్పాటు చేసిన, చేస్తున్న స్తంభాలు, తీగల యొక్క (జీవిత కాలం) కాలపరిమితి ఎంత? వాటి యొక్క జీవిత కాలం ముగిసిన తర్వాత పాతవి తీసివేసి కొత్తవి ఎక్కడైనా ఏర్పాటు చేశారా? వీటి యొక్క జీవిత కాలం ముగిసి ఈ మధ్య ఈ యొక్క తీగలు తెగిన కారణంగానే మనుషులు, పశువులు చాలా చోట్ల చనిపోవడం జరిగింది.</p>	<p>సాధారణంగా సిమెంటు స్తంభాల యొక్క కాల పరిమితి వాతావరణం పరిస్థితుల పైన ఆధారపడి ఉంటుంది మరియు వాడే విద్యుత్ ప్రవాహక లోడును బట్టి ఆధారపడి ఉంటుంది. మా సిబ్బంది తరచూ ఫీల్డ్ సర్వే చేస్తూ పాడై/విరిగి పోయిన లేదా వంగి పోయిన స్తంభాలను మరియు పాడైపోయిన తీగలను గుర్తించి మార్చడం జరుగుతుంది. అంతే కాకుండా మాకు విరిగిపోయిన లేదా పాడై/విరిగి పోయిన స్తంభాలు మరియు తెగి పోయిన తీగల గురించి వచ్చిన ఫిర్యాదులను అప్పటికప్పుడు పరిష్కరించడం జరుగుతుంది. వివిధ రకాల పథకాలలో కూడా విరిగిపోయిన లేదా వంగి పోయిన స్తంభాలను మరియు పాడైపోయిన తీగలను గుర్తించి సరి చేయడం జరిగింది. ఉదాహరణకు పల్లె ప్రగతి మరియు పట్టణ ప్రగతి పథకంలో జగిత్యాల జిల్లాలో 2,359 విరిగిపోయిన, 384 వంగిపోయిన స్తంభాలను సరిచేయడం జరిగింది. లూజు లైన్లకు మధ్యలో 458 కొత్త స్తంభాలను వేయడం జరిగింది. 280 తుప్పు పట్టిన స్తంభాలను గుర్తించి, వాటి స్థానంలో కొత్త స్తంభాలను వేయడం జరిగింది.</p>

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
3.	కిందికి వేలాడుతున్న తీగలు ఎప్పటి కప్పుడు సరి చేసున్నారా? రైతులు చేయాలా?	మా సిబ్బంది తరచూ ఫీల్డ్ సర్వే చేస్తూ కిందికి వేలాడుతున్న తీగలను గుర్తించి పునరుద్ధీకరించడం జరుగుతుంది. రైతులు చేయవల్సిన అవసరం లేదు. స్తంభాలు అవసరం ఉన్న ప్రదేశాలలో మధ్య స్తంభాలు వేయడం జరుగుతుంది. వివిధ రకాల పథకాలలో కూడా వేలాడుతున్న తీగలను గుర్తించి పునరుద్ధీకరించడం జరిగింది. ఉదాహరణకు పల్లె ప్రగతి మరియు పట్టణ ప్రగతి పథకంలో 41.52 కి. మీ. కిందికి వేలాడుతున్న తీగలను గుర్తించి పునరుద్ధీకరించడం జరిగింది.

2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్కార్డీ ప్రతిపాదనల పై శ్రీ వేముల విక్రమ్ రెడ్డి జర్నలిస్ట్, ఇంటి నెం.7-38, హనుమాండ్లపల్లె గ్రామము, కోసూర్ పల్లె, జైన (పోస్ట్ & రెవిన్యూ), ధర్మపురి (మండలం), జగిత్యాల జిల్లా 505425 గారి సూచనలు/సలహాలకు సమాధానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL – సమాధానాలు
1.	నా మనవి ఏమనగా ! నా వ్యక్తిగత, సంబంధీకుల మరియు ప్రజా వ్యక్తిగత, ప్రయోజిత విద్యుత్ సమస్యలు దృష్టికి తీసుక వచ్చేందుకు ఉపయుక్త సహ సూచనలు చేసేందుకు అవకాశం కల్పించాలని కోరుతున్నాం.	ఈ అంశము గౌరవ విద్యుత్ నియంత్రణ మండలి పరిధిలోకి వస్తుంది.

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్పార్టీ ప్రతిపాదనల పై శ్రీ చెరుకూరి కృష్ణారావు, బండి కృష్ణారెడ్డి, జిల్లా కార్యదర్శి, భారతీయ కిసాన్ సంఘ్, ఖమ్మం జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCCL - సమాధానాలు
	మేము అనగా CH. కృష్ణారావు, B. కృష్ణారెడ్డి, భారతీయ కిసాన్ సంఘ్ జిల్లా కార్యదర్శి, అధ్యక్షులు	
1.	విషయము - ఏమనగా ఖమ్మం జిల్లాలోని ప్రతి మండలములో రైతులెవరైనా కొత్తగా D.D.లు కట్టినా, చాలా వరకు పనులు రైతులచే చేయిస్తున్నారు. Ex. ట్రాన్స్ఫార్మర్ తీసుకోని పోవుట, దిమ్మెలు కూడా రైతులతో కట్టించుట జరుగుచున్నవి. ట్రాన్స్ఫార్మర్ కాలిపోయినప్పుడు మరియొక ట్రాన్స్ఫార్మర్ బిగించుటకు డిపార్టుమెంటు వారు ప్రైవేట్ వ్యక్తులను నియమించుకొని (కొన్ని మండలాలలో రైతుల నుండి 10 వేల నుండి 20 వేల రూపాయలు వసూలు చేయిస్తున్నారు. ఇక ముందు ఇలా జరుగకుండా చూడగలరు. కొత్త డి.డి.లు కట్టిన రైతులలో కొందరికి కనెక్షన్లు ఇచ్చి 4, 5 సంవత్సరములైనా సర్వీస్ నెంబర్ అలాట్ చేయలేదు. సర్వీస్ నంబర్లు ఇచ్చిన వారిలో కొందరికి 3 పోల్స్ ఇవ్వవలసిన దగ్గర 1 పోల్ తో సరిపెట్టుటవలన రైతులు సర్వీస్ వైర్లను కర్రల పై వేసుకొని మోటార్లను నడిపించుకొనుచున్నారు. కొత్త కనెక్షన్లు ఇచ్చినప్పుడు కొన్ని చోట్ల ట్రాన్స్ఫార్మర్ల కెపాసిటీకి మించి లోడు ఉన్నప్పుడు విడిగా వేరే ట్రాన్స్ఫార్మర్ ఇవ్వకుండా ఉన్న ట్రాన్స్ఫార్మర్ తోనే కనెక్షన్లు ఇవ్వడం వలన ట్రాన్స్ఫార్మర్ మరియు మోటార్లు కూడా కాలిపోతున్నవి. దీని వలన ప్రభుత్వమునకు, రైతులకు ఆర్థికంగా నష్టము జరుగుచున్నది.	ఖమ్మం జిల్లాలో వ్యవసాయ సర్వీసులకు లైన్ వేసే పనులను కేవలం కాంట్రాక్టర్లై నిర్వహిస్తున్నారు. ఏ రైతుచే అయినా ట్రాన్స్ఫార్మర్ గద్దె నిర్మించుట, స్తంభం మరియు మెటీరియల్ రవాణా మొదలైన వాటిని అనుమతించడం లేదు. రైతుల పంటలను రక్షించడానికి అవసరమైన చోట ఇప్పటికే ఉన్న ట్రాన్స్ఫార్మర్ల పై ఓవర్లోడ్ ఉపశమనం కలిగించడానికి అదనపు ట్రాన్స్ఫార్మర్లను ఏర్పాటు చేస్తున్నారు. క్షేత్ర స్థాయి అవసరాలకు అనుగుణంగా ఎస్టిమేట్లు తయారు చేస్తూ వాటి ప్రకారం LT లైన్లను ఏర్పాటు చేస్తున్నారు. పై పనులను చేపట్టేందుకు ఏ ఒక్క ప్రైవేట్ వ్యక్తుల ద్వారా రైతుల నుంచి ఎలాంటి మొత్తాలు (లంచం) వసూలు చేయడం లేదు.
2.	ఖమ్మం జిల్లా పెనుబల్లి మండలములోని "అడవిమల్లెల" గ్రామ రైతులకు ప్రభుత్వము లంకసాగర్ ప్రాజెక్టులో నుండి లిఫ్ట్ ఏర్పాటు చేసి భూములకు నీటి వసతి కల్పించారు. ఆ లిఫ్ట్ పని చేయకుండా పోవుట వలన కొందరు రైతులు ఆ లిఫ్ట్ ట్రాన్స్ ఫార్మర్ నుండి కనెక్షన్లు ఏర్పాటు చేసుకొని సొంతంగా పైపులైన్లు ఏర్పారుచుకొని మోటార్లు పెట్టుకొని పంటలు పండించుకొనుచున్నారు. కొత్తగా కొందరు పైపులైన్లు వేసుకొని మోటార్లు పెట్టుకొనుటకు ఉన్న ట్రాన్స్ ఫార్మర్లకు కెపాసిటీకి మించి కనెక్షన్లు ఉండుటవలన కొత్తగా ట్రాన్స్ ఫార్మర్ ఇవ్వమని దాని కొరకు కట్టవలసిన డబ్బులు కడతామని డిపార్ట్మెంట్ వారిని అనేక సార్లు అడిగినా ఇవ్వడం లేదు.	అడవిమల్లెల (లంకసాగర్) గ్రామంలో ఒక లిఫ్ట్ ఇరిగేషన్ చాలా కాలం క్రితం నుండి ఉన్నది. ప్రస్తుతం అడవి మెల్లెలలో లిఫ్ట్ ఇరిగేషన్ స్కీమ్ పని చేయడం లేదు, మోటార్లు కూడా లేవు. కొన్ని స్వతంత్ర వ్యవసాయ సర్వీసులు లిఫ్ట్ ట్రాన్స్ఫార్మర్పై నడుస్తున్నాయి. ఈ సర్వీసులు కూడా చాలా కాలం క్రితం విడుదల చేయబడ్డాయి. పైన పేర్కొన్న పథకానికి నీటి వనరు లంకసాగర్ అనే నీటిపారుదల ఆధారిత సరస్సు.
	గతంలో ఈ కనెక్షన్ల పై ఖమ్మం జిల్లా కలెక్టర్ గా పని చేసిన శ్రీమతి ఉషారాణి గారు	లంకసాగర్ నీటి సరస్సు దగ్గర వ్యవసాయ కనెక్షన్లు కావాలని రైతులు అభ్యర్థిస్తున్నారు, ఓపెన్ బావులు లేదా బోరు బావులు

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	<p>స్వయముగా పరిశీలించి మన ప్రభుత్వము లిఫ్ట్ ఇరిగేషన్ ఇచ్చి సక్రమముగా నడుపుట లేక పోవుట వలన రైతులు స్వయముగా వారి ఖర్చులతో పైపులైన్లు వేసుకొని పంటలు పండించుకొనుచున్నారు. కనుక కరెంటు కనెక్షను ఆపవద్దని ఆదేశించియున్నారు. కనుక కొత్తగా కనెక్షను అడిగిన రైతులకు ట్రాన్స్ ఫార్మర్ ఏర్పాటు చేయగలరని మనవి. (దీని వలన ప్రభుత్వమునకు ఆర్థికముగా లాభము జరుగుచున్నది).</p>	<p>తవ్వకుండా లంకసాగర్ నీటి సరస్సు నుండి నీటిని ఎత్తిపోస్తారు. లంకసాగర్ నీటిపారుదల ఆధారిత ప్రాజెక్ట్ కాబట్టి, పైన పేర్కొన్న రైతుల అభ్యర్థన మా శాఖా విధానం ప్రకారం పరిగణించబడదు.</p>

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ తోట రాకేష్, రామారెడ్డి, కామారెడ్డి గారి సూచనలు/సలహాలకు సమాధానాలు**

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1.	<p><b>అక్రమ భూసేకరణ గూర్చి</b>  నేను అనగా తోట రాకేష్, s/o లింగం, r/o రామారెడ్డి గ్రామం, Sy. No.855 నెంబర్ లో వ్యవసాయ భూమిని కలిగియున్నాను, ఎలాంటి నోటీసు లేకుండా TS TRANSCO కంపెనీ మరియు MEIL కంపెనీ వారు ఎలక్ట్రికల్ ట్రాన్సిమిషన్ లైన్ కోసం అక్రమణంగా సర్వే చేశారు. MEIL Company ఉద్యోగులు ఎలాంటి పంటలను వేయరాదు అంటు రైతులను బెదిరిస్తారు మరియు భౌతిక దాడులకు పాల్పడుతున్నారు. TS TRANSCO మరియు MEIL Company వారి పై తగు చర్యలను తీసుకోగలరు.</p>	<p>రంగారెడ్డి లిఫ్ట్ ఇరిగేషన్ స్కీమ్ లో భాగంగా 400 KV కొత్త టవర్ లైన్ ఎరెక్షన్ (ట్రాన్స్మిషన్ కార్పొరేషన్) కొరకు ట్రాన్స్కో డిపార్ట్మెంట్ డిచ్పల్లి నుండి పాలమూరు వరకు సర్వే చేసినారు. రైతులకు పరిహారం ట్రాన్స్కో డిపార్ట్మెంట్ వారు చెల్లించినారు.</p>



**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ మర్రిపల్లి రాజ గౌడ్, పర్మల గ్రామం, లింగంపేట మండలం, కామారెడ్డి జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>ఎల్లారెడ్డి, లింగంపేట నాగిరెడ్డిపేట మండలాల్లో ప్రతి గ్రామంలో LT &amp; HT లైన్లు లూజుగా ఉన్నవి. వీటిని సరిజేయ వలసిన భాద్యత NPDCL పైన లేదా మరియు సగానికి పైగా DTRలకు AB స్విచ్లు లేక రైతులు చాలా ఇబ్బంది పడుతున్నారు. Toll Free నెంబర్ కు కాల్ చేస్తే కంప్లెంట్ (నెం) ఇవ్వకుండా సతాయిస్తున్నారు. DTRకు ఏ సమస్య వచ్చిన దానికి సంబంధించిన మెటీరియల్ మొత్తము రైతుల తోనే కొనిపిస్తున్నారు. DTRలు కాలిపోతే రైతే స్వయంగా ట్రాన్స్ ఫోర్డ్ చేయవలసి వస్తున్నది. కావున దీని పై నాకు మూడు నిమిషముల సమయం ఇవ్వవలసిందిగా కోరుచున్నాను.</p>	<p>ఎల్లారెడ్డి మండలంలో 41 విద్యుత్ పంపిణీ ప్రాంతాలు మరియు 1345 DTRలు ఉన్నాయి. పల్లె ప్రగతి పథకంలో భాగంగా 60 - AB స్విచ్లు లేని DTRలు, HT లూస్ లైన్లు - 71, LT లూస్ లైన్లు - 18, 11 KV ఇంటర్మీడియట్ పోల్స్ - 162, LT ఇంటర్మీడియట్ పోల్స్ - 207, HT దెబ్బతిన్న పోల్ - 102 మరియు LT దెబ్బతిన్న పోల్ - 167 గుర్తించి వాటిని సరిచేయడం జరిగినది.</p> <p>నాగిరెడ్డిపేట మండలంలో 1369 - DTRలు ఉన్నాయి. పల్లె ప్రగతి పథకంలో భాగంగా 303 - AB స్విచ్లు లేని DTRలు, HT లూస్ లైన్లు - 209, LT లూస్ లైన్లు - 5, 11 KV ఇంటర్మీడియట్ పోల్స్ - 273, LT ఇంటర్మీడియట్ పోల్స్ - 118, HT దెబ్బతిన్న పోల్ - 138 మరియు LT దెబ్బతిన్న పోల్ - 29 గుర్తించి వాటిని సరిచేయడం జరిగినది.</p> <p>లింగంపేట మండలంలో 19 విద్యుత్ పంపిణీ ప్రాంతాలు. పల్లె ప్రగతి పథకంలో భాగంగా 98 - AB స్విచ్లు లేని DTRలు, 11 KV లూస్ లైన్లు - 90, LT లూస్ లైన్లు - 9, 11 KV ఇంటర్మీడియట్ పోల్స్ - 244, LT ఇంటర్మీడియట్ పోల్స్ - 45, 11 KV దెబ్బతిన్న పోల్ - 185 మరియు LT దెబ్బతిన్న పోల్ - 29 గుర్తించి వాటిని సరిచేయడం జరిగినది.</p> <p>HVDS సిస్టమ్లో ఏర్పాటు చేసిన DTRలకు ప్రత్యేక AB స్విచ్లు అందించబడవు. ఫీడర్లోని వినియోగదారులకు అంతరాయాలను తగ్గించడానికి ఈ DTRలకు AB స్విచ్లు నియంత్రణ పాయింట్లో అందించబడతాయి.</p> <p>ఫెయిల్ అయిన ట్రాన్స్ఫార్మర్ల రవాణా నిమిత్తం SPM వెహికిల్ మరియు సబ్ డివిజన్ వెహికిల్ అందుబాటులో ఉంచి ఎక్కువ శాతం తరలించడం జరుగుతున్నది. కానీ కొన్ని సమయాలలో ట్రాన్స్ఫార్మర్ల ఫెయిల్యూర్స్ అధికమైనచో ఒకటి లేదా రెండు రోజుల జాప్యంతో ట్రాన్స్ఫార్మర్లను డిపార్ట్మెంట్ వెహికిల్స్ ద్వారానే తరలించడం జరుగుతున్నది. అతి తక్కువ సందర్భాలలో వెహికిల్ అందుబాటులో లేనిచో రైతులు తమ ఇష్టప్రకారమే ట్రాన్స్ఫార్మర్లను రవాణా చేయుచున్నారు.</p>



**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్పార్టీ ప్రతిపాదనల పై శ్రీ ఐ. సాయిలు, పరమల్ల గ్రామం, లింగంపేట మండలం, కామారెడ్డి జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL – సమాధానాలు
1.	పరమల్ల, మండలం లింగంపేట, జిల్లా కామారెడ్డి గ్రామంలో డి.టి.ఆర్. తక్కువ ఉండడం వల్లన కాలిపోవడం జరుగుతుంది. లోడ్ కు సరిపోవు డి.టి.ఆర్.లు లేవు ప్రతి నెలకు ఒక్కసారి ఈ సమస్య గ్రామంలో జరుగుతుంది.	పరమల్ల, మండలం లింగంపేట, జిల్లా కామారెడ్డి గ్రామంలో సెక్షన్ ఆఫీసర్ కేత్ర స్థాయిలో DTR లన్నిటిని తనిఖీ చేసి ఓవర్ లోడ్ DTRలు లేవని నిర్ధారించడం జరిగినది.
2.	AB స్విచ్లు కొత్త ట్రాన్స్ ఫార్మర్లకు బిగించుట లే ఏమని అడుగుతే స్టాక్ లేదు అని అంటున్నారు.	HVDS సిస్టమ్లో ఏర్పాటు చేసిన DTRలకు ప్రత్యేక AB స్విచ్లు అందించబడవు. ఫీడర్లోని వినియోగదారులకు అంతరాయాలను తగ్గించడానికి ఈ DTRలకు AB స్విచ్లు నియంత్రణ పాయింట్లో అందించబడతాయి.
3.	HG పూజు సెట్టు కూడా బిగించుట లేదు.	DTRలకు LT & HT పూజ్ సెట్లను డిపార్ట్మెంట్ సిబ్బంది బిగించడం జరిగినది.
4.	విలేజిలో ఇంటి మీటర్లు చాలా ఎక్కువ బిల్లులు రావడం జరుగుతుంది. ఆ యొక్క మీటర్లను రీఫ్లేస్ చేయాలి.	వినియోగదారులకు విద్యుత్ వినియోగం ప్రకారం బిల్లు జారీ చేయబడుతుంది. లోపభూయిష్ట/కాలిపోయిన మీటర్లను మార్పడం జరిగినద
5.	పరమల్ల గ్రామంలో సబ్-స్టేషన్ దగ్గర గల భూమిలో 11 KV వైర్లు రెండు మరియు 33 KV లైన్ కూడా వున్నది. ఇందులో నుండి 11 KV వైర్లు రోడ్ సైడ్ వేయ గలరు.	వినియోగదారులు పిష్టింగ్ ఛార్జీలు చెల్లించిన పిమ్మట ఈ లైన్లు రోడ్డు వైపుకు మార్పడం జరుగుతుంది.
6.	డి.టి.ఆర్. నుండి చాలా వరకు సర్వీస్ వైర్ నుండి మోటార్ నడిపియడం జరుగుతుంది. సకాలంలో ఎక్స్ట్రా పోల్ మరియు వైర్లు గుంజ గలరు.	వినియోగదారులు ఎస్టిమేట్ ఛార్జీలు చెల్లించిన పిమ్మట పోల్స్ మరియు లైను గుంజడం జరుగుతుంది.
7.	డి.డి.లు కట్టిన తర్వాత చాలా ఎక్కువ రోజులకు డి.టి.ఆర్లు మంజూరు కావడం లేదు కాంట్రాక్టర్స్ చాలా ఆలస్యం చేయడం జరుగుతుంది.	వినియోగదారులు చెల్లించిన DDల ప్రాధాన్యత మరియు సెక్షన్ సీనియారిటీ ప్రకారం వ్యవసాయ సర్వీసులు రిలీజ్ చేయడం జరుగుతుంది.

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై**  
**శ్రీ అంభీర్ ఆనంద్ రావు, బ్రాహ్మణపల్లి పోస్ట్, తాడవాయి మండలం, కామారెడ్డి జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	రైతు పొలం వద్ద DTR ట్రాన్స్ ఫార్మర్ కాలిపోతే, DTR చెడిపోతే దాని రిపేరు దానికి సంబంధించిన రిపేర్ ఎవరు చేయాలి. NPDCL వారు మాత్రం మా యొక్క రైతుల చే చేయిస్తున్నారు. DTR చెడిపోతే ట్రాన్స్ పోర్ట్ ఎవరు చేయాలి, ఇట్టి పని మొత్తం రైతుల చే చేయిస్తున్నారు. దీనికి వ్రాత పూర్వకముగా మరియు మౌఖికముగా సమాధానము చెప్పగలరు.	విఫలమైన DTRలు డిపార్ట్మెంట్ (SPM లేదా సబ్సి-విజన్) వాహనాల ద్వారా మాత్రమే రవాణా చేయబడం జరుగుతుంది మరియు DTRల మరమ్మతులు డిపార్ట్మెంట్ సిబ్బంది మాత్రమే నిర్వహిస్తారు.
2.	రైతుల బోరు కొరకు కనెక్షన్ అడిగితే దానికి సంబంధించిన లైను, పోల్స్, ట్రాన్స్ పోర్టు ఎవరు చేయాలి. దీనికి DTR అవసరమైతే DTR కిమ్మతు ఎస్టిమేట్ లో కలుపుతారా. దీనిని వ్రాత పూర్వకముగా సమాధానము చెప్పగలరు. ట్రాన్స్ పోర్టు రైతులు చేసిన కారణంగా కామారెడ్డి జిల్లా రామారం మండలంలో ఇద్దరు రైతులు నిండు ప్రాణాలను బలిగొన్నారు. దయచేసి దీనికి సమాధానము చెప్పగలరు.	వినియోగదారులు DDలు చెల్లించిన తరువాత డిపార్ట్మెంట్ ద్వారా పోల్స్ మరియు లైన్లు ఏర్పాటు చేయడం జరుగుతుంది. DTR అవసరాన్ని బట్టి దాని యొక్క ధర ఎస్టిమేట్ లో చేర్చడం జరుగుతుంది.

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై**  
**శ్రీ దెవిరెడ్డి విఠల్ రెడ్డి, ఏతాం పహాడ్ గ్రామము, తాడ్వాయి మండలం, కామారెడ్డి జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>రైతుల పొలములో గ్రామం ఏతాంపహాడ్, తాడ్వాయి మండలం గ్రామ రైతుల చేనులలో లూజ్ లైన్లు చాలా ఉన్నాయి. నేను AE గారికి చూపించి ఒక సంవత్సరము అవుచున్నది. కానీ ఇప్పటికి స్థంబాలు ఇవ్వ లేదు. SS-6, SS-7 ఇప్పుడు కొత్తగా పెట్టె ట్రాన్స్ ఫార్మర్లకు AB స్విచ్లులు పెట్టలేదు. మరల ట్రాన్స్ ఫార్మర్ కాలిపోతే రైతులే తీసుక వెళ్లడం ఇది సమస్య. కొత్తగా డి.డి.లు కట్టినవి ఒక సంవత్సరము ఐన స్థంబాలు లేవు వాటిగురించి మాకు సమస్య చెప్పగలరు. రైతుల సమస్యలు ఇంకా చాలా ఉన్నాయి.</p>	<p>ఎర్రాపహాడ్ గ్రామంలో SS-6/100 KVA మీద AB స్విచ్లు మరియు సమీపంలో 4 మధ్యస్థ స్థంబాల కొరకు WBS నెం.T-2101-13-01-01-03-007తో ఎస్టిమేట్ సిద్ధం చేసి మంజూరు కోసం సమర్పించబడింది. విఫలమైన DTRలు డిపార్ట్మెంట్ వాహనాల ద్వారానే రవాణా చేయబడుతున్నాయి. వినియోగదారులు చెల్లించిన DDల ప్రాధాన్యత మరియు సెక్షన్ సీనియారిటీ ప్రకారం వ్యవసాయ సర్వీసులు రిలీజ్ చేయడం జరుగుతుంది.</p>

2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ కొమిరెడ్డి చిన్న ఆంజనేయులు s/o చిన్న సాయన్న, లింగాపురం గ్రామము, కామారెడ్డి మండలం & జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	ట్రాన్స్ ఫార్మర్ నెం.55 10, S.No.577 స్తంభాలు చాలా దూరంగా ఉండడం వలన కరెంటు తీగలు చాలా కిందికి ఉంటున్నాయి. దాని వలన చెరుకు తోటలు కాళిపోతున్నాయి. కావున స్తంభానికి స్తంభానికి నడుమ ఇంకొక స్తంభం వేయగలరు అని కోరుతున్నాము.	4-స్తంభాలు ఏర్పాటు మరియు లైన్ సరి చేయడం జరిగినది.

2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై  
 శ్రీ ఏ. రాజయ్య, శత్ పల్లి, సంగారెడ్డి, లింగంపేట మండలం, కామారెడ్డి జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL – సమాధానాలు
1.	ప్రతి బోరు మోటరునకు పోల్ ఇవ్వగలరు.	వినియోగదారులు DD ఛార్జీలు చెల్లించిన పిమ్మట పోల్స్ మరియు లైను డిపార్ట్మెంట్ ద్వారా ఏర్పాటు చేయడం జరుగుతుంది.
2.	ప్రతి ట్రాన్స్ ఫార్మర్ కు AB స్విచ్ పెట్టగలరు.	HVDS సిస్టమ్లో ఏర్పాటు చేసిన DTRలకు ప్రత్యేక AB స్విచ్లు అందించబడవు. ఫీడర్లోని వినియోగదారులకు అంతరాయాలను తగ్గించడానికి ఈ DTRలకు AB స్విచ్లు నియంత్రణ పాయింట్లో అందించబడతాయి.
3.	ట్రాన్స్ ఫార్మర్ చెడిపోయిన వాటికి డెలివరీ చేయగలరు.	ట్రాన్స్ ఫార్మర్ చెడిపోయిన వాటికి డెలివరీ చేస్తాము.

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్పార్టీ ప్రతిపాదనల పై**  
**శ్రీ పైడి విఠల్ రెడ్డి, చందాపూర్ గ్రామం, తాడవాయి మండలం, కామారెడ్డి జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL – సమాధానాలు
1.	<p>ట్రాన్స్ ఫార్మర్ కాలిపోతే రైతులే ట్రాక్టర్ లో తీసుకుపోయి రైతులే తీసికొనివచ్చి ఫిట్ చేసుకుంటున్నారు. ఆన్-ఆఫ్ స్విచ్చులు లేవు అంటున్నారు మరియు Toll Free నంబరుకు ఫోన్ చేస్తే మీ AE కి లేదా లైన్ మెన్ కు చెప్పండి అంటూ ఫోన్ పెట్టేస్తున్నారు మరియు కంప్లైంట్ నంబరు ఇవ్వడం లేదు.</p>	<p>ఫెయిల్ అయిన ట్రాన్స్ఫార్మర్ల రవాణా నిమిత్తం SPM వెహికిల్ మరియు సబ్ డివిజన్ వెహికిల్ అందుబాటులో ఉంచి ఎక్కువ శాతం తరలించడం జరుగుతున్నది. కానీ కొన్ని సమయాలలో ట్రాన్స్ఫార్మర్ల ఫెయిల్యూర్స్ అధికమైనచో ఒకటి లేదా రెండు రోజుల జాప్యంతో ట్రాన్స్ఫార్మర్లను డిపార్ట్మెంట్ వెహికిల్స్ ద్వారానే తరలించడం జరుగుతున్నది. అతి తక్కువ సందర్భాలలో వెహికిల్ అందుబాటులో లేనిచో రైతులు తమ ఇష్టప్రకారమే ట్రాన్స్ఫార్మర్లను రవాణా చేయుచున్నారు</p> <p>HVDS సిస్టమ్లో ఏర్పాటు చేసిన DTRలకు ప్రత్యేక AB స్విచ్లు అందించబడవు. ఫీడర్లోని వినియోగదారులకు అంతరాయాలను తగ్గించడానికి ఈ DTRలకు AB స్విచ్లు నియంత్రణ పాయింట్లో అందించబడతాయి.</p> <p>సాధారణంగా కాలి సెంటర్ ఏజెంట్లు ఫిర్యాదులను నమోదు చేసేటప్పుడు ఫిర్యాదు సంబంధిత క్షేత్రస్థాయి సిబ్బందికి తెలియజేశారా లేదా అని విచారించి ఫిర్యాదు నమోదు చేసుకుంటారు. ఫిర్యాదు నమోదు పై వినియోగదారుడికి SMS రూపంలో ఫిర్యాదు నమోదు ID వివరాలు పొందుతారు.</p>
2.	<p>D.D.లు కట్టిన 45 రోజులలో ఇవ్వవలసిన కనెక్షన్ కానీ ట్రాన్స్ ఫార్మర్ ఫిట్ చేయడం లేదు. AE గారిని అడిగితే మీ సీరియల్ రాలేదు అని సంవత్సరాలు ఐన కనెక్షన్ ఇవ్వడం లేదు.</p>	<p>వినియోగదారులు చెల్లించిన DDల ప్రాధాన్యత మరియు సెక్షన్ సీనియారిటీ ప్రకారం వ్యవసాయ సర్వీసులు రిలీజ్ చేయడం జరుగుతుంది.</p>

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ ఏనుగు రాజు, మోతే గ్రామం, లింగంపేట మండలం, కామారెడ్డి జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL – సమాధానాలు
1.	నా పేరు ఏనుగు రాజు s/o సాయి రెడ్డి గ్రామము మోతే, లింగంపేట మండలం, కామారెడ్డి జిల్లా గారిని నా యొక్క గ్రామము మోతేలో సుమారు 30 నుండి 35 DTR లు కలవు కేవలం 3 నుండి 4 వరకు మాత్రమే AB స్విచ్లు కలవు మిగతా వాటికి అసలు లేవు. లూజు లైన్లు అలానే ఉండిపోయినవి.	HVDS సిస్టమ్లో ఏర్పాటు చేసిన DTRలకు ప్రత్యేక AB స్విచ్లు అందించబడవు. ఫీడర్లోని వినియోగదారులకు అంతరాయాలను తగ్గించడానికి ఈ DTRలకు AB స్విచ్లు నియంత్రణ పాయింట్లో అందించబడతాయి.
2.	ట్రాన్స్ ఫార్మర్లు కాలిపోతే రైతులు కలిసి మోటారుకు 500 రూపాయల డబ్బులు జమచేసి దానిని తీసుకపోయి తీసుకువచ్చే పరిస్థితులు కలిగిస్తున్నారు. హెల్పర్, లైన్ మెన్లు పట్టించుకుంట లేరు. ఈ పద్ధతి సరియైనది కాదు. కావున దీనిని సరి చెయ్యగలరు. కరెంట్ సమస్య ఏది ఉన్న NPDCL గారి టోల్-ఫ్రీ నెంబరుకు చేసినా పని అవ్వడం లేదు. ఏ చిన్న రిపేర్ ఉన్నా రైతుల నుండి డబ్బులు వసూలు చేసి చేస్తున్నారు, ఇది మారాలి.	SPM సెంటర్లో ఎటువంటి లోడింగ్ & అన్లోడింగ్ ఛార్జీలు చెల్లించకూడదనే సమాచారంతో నోటీసు బోర్డులు SPM సెంటర్లో ఏర్పాటు చేయడం జరిగింది. ఎవరైనా లేబర్ ఛార్జీలు అడిగితే కాల్/సమాచారం ఇవ్వడానికి సంబంధిత AE,ADE/SPM & DE/MRT నంబర్లు ప్రదర్శించ బడ్డాయి. టోల్-ఫ్రీ నంబరుకు ఫిర్యాదు అందిన వెంటనే సమస్యను సంబంధిత అధికారులు పరిష్కరిస్తున్నారు.

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ కుమ్మరి సిద్ధి రాములు, పర్సల్ గ్రామము, లింగంపేట్ మండలం, కామారెడ్డి జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL – సమాధానాలు
1.	<p>SS-I ట్రాన్స్ ఫార్మర్ కాలిపోయి 10 రోజులు అవుతుంది దాని రిపేర్ చేయుట గురించి అడుగుతే 20 లేక 25 మంది సభ్యులు వున్నారు ఓక (6) లేదా (5) మంది సభ్యులు బిల్లు కట్టలేదు. దానివలన మేము ట్రాన్స్ ఫార్మర్ రిపేర్ చేయమని అంటున్నారు. నేను బిల్లు కట్టిన, నేను వరి నాటు వేసిన, కరెంటు లేక పోవడంతో వరి ఎండిపోవడం జరుగుతుంది మరియు ట్రాన్స్ ఫార్మర్ మేము తీసుకోని పోయి SPM కు సొంత డబ్బుల ఖర్చుతోని తీసుకోవడం మరియు అందులో ఆయిల్ తగ్గితే ఆయిల్ ను డబ్బులు తీసుకోవడం జరుగుతుంది. రైతులే న్యూట్రల్ పైపులు మీ సొంత డబ్బుతో కొనుమని చెబుతున్నారు. ఎవర్లింగ్ లేక ట్రాన్స్ ఫార్మర్ కాలిపోవడం జరుగుతుంది. మా ఊరిలో ఏ ఒక్క ట్రాన్స్ ఫార్మర్ కు AB స్విచ్లు లేవు. LT లైను క్రిందకి వున్నాయి. ట్రాక్టర్ తో దున్నేటప్పుడు ట్రాక్టర్ కు తగులుతున్నాయి. లూజ్ స్తంభాలు అడిగితే ఇప్పుడు లేవు మీరే సొంత డబ్బులతో కొనుకోమని చెబుతున్నారు. LT లైన్ వలన కొన్ని సమయాలలో జంతువులూ చనిపోవడం జరుగుతుంది. ట్రాన్స్ ఫార్మర్ల ఫ్యూజ్ వైర్లు రైతులతో వేయిస్తున్నారు. పైన వున్నా పనులను విద్యుత్ కంపెనీ వారు చేయగలరని నా యొక్క మనవి.</p>	<p>SS-I/100 KVA DTR కాలిపోలేదు. తేది:28.01.2022 రోజున SS-29/100 KVA DTR కాలిపోయినది. తేది:30.01.2022 రోజున మార్పడం జరిగినది. SPM సెంటర్లో ఎటువంటి లోడింగ్ &amp; అన్లోడింగ్ ఛార్జీలు చెల్లించకూడదనే సమాచారంతో నోటీసు బోర్డులు SPM సెంటర్లో ఏర్పాటు చేయడం జరిగింది. ఎవరైనా లేబర్ ఛార్జీలు అడిగితే కాల్/సమాచారం ఇవ్వడానికి సంబంధిత AE,ADE/SPM &amp; DE/MRT నంబర్లు ప్రదర్శించ బడ్డాయి. HVDS సిస్టమ్లో ఏర్పాటు చేసిన DTRలకు ప్రత్యేక AB స్విచ్లు అందించబడవు. ఫీడర్లోని వినియోగదారులకు అంతరాయాలను తగ్గించడానికి ఈ DTRలకు AB స్విచ్లు నియంత్రణ పాయింట్లో అందించబడతాయి. LT లూజు లైన్ల కొరకు క్షేత్ర స్థాయి తనిఖీ నిర్వహించి ఎస్పిమేట్ వేయడం జరిగినది. శాంక్షన్ అయిన వెంటనే లూజ్ లైన్లు వీలైనంత త్వరగా సరిచేయబడతాయి. పైన పేర్కొన్న పనులన్నిటినీ విద్యుత్ సంస్థ వారే నిర్వహించడం జరుగుతుంది.</p>



**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ చిట్యాల రాజేశ్వర్, పొనకల్ గ్రామం, మామడ మండలం, నిర్మల్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL – సమాధానాలు
1.	<p>మా యొక్క ట్రాన్స్మిషన్ లోడ్ ఎక్స్టెన్షన్ చేయించుట గురించి 100 KVA DTR ఉన్నది. 43 మోటార్లు నడుస్తున్నవి. మిగిలిన రైతులు కూడా DD లు కట్టినారు. మీ సేవా ద్వారా పంపినాము. CGRF కంపైంట్ కూడా ఇచ్చినాము. అయినా పని కాలేదు. మాకు న్యాయం చేయగలరు. మా AE గారు కావాలని ఇబ్బంది పెడుతున్నారు. ఇప్పటికి చాలా ఆలస్యం అయినది. మాకు న్యాయం చేయగలరు.</p>	<p>పొనకల్ లోని 100 KVA ట్రాన్స్మిషన్ సమీపం లోని రైతులు విద్యుత్ కనెక్షన్ కోసం అదనపు DDలు చెల్లించినందున ఆ ట్రాన్స్మిషన్ పై ఎక్కువ కనెక్షన్లు ఇవ్వడం జరిగింది. కానీ ఆ ట్రాన్స్మిషన్ మీద ఉన్న అదనపు లోడ్ ను గుర్తించి అదనపు 100 KVA ట్రాన్స్మిషన్ కొరకు ఎస్టిమేట్ (T-2101-14-01-02-02-012) మంజూరు చేయడం జరిగింది. 15 రోజులలో పని పూర్తి చేయడం జరుగుతుంది.</p>
2.	<p>ట్రాన్స్మిషన్ తీసుకురండి మీరే తీసుకుపోండి అని AE గారి సమాధానం. మా వెహికల్ అందుబాటులో లేదు. మీరే వెహికల్ తీసుక వచ్చి DTR తీసుకోని పోండి అని సమాధానం. మాకు వెహికల్ అందుబాటులో ఉంచండి. AE గారు చాలా రైతులను బెదిరిస్తున్నారు. పని చేయకుండా కావాలని ఇబ్బంది పెడుతున్నారు. కావున మాకు న్యాయం చేయగలరు.</p>	<p>ఫెయిల్ అయిన ట్రాన్స్మిషన్ రవాణా నిమిత్తం SPM వెహికల్ మరియు సబ్ డివిజన్ వెహికల్ అందుబాటులో ఉంచి ఎక్కువ శాతం తరలించడం జరుగుతున్నది. కానీ కొన్ని సమయాలలో ట్రాన్స్మిషన్ ఫెయిల్ అయినట్లైతే అధికమైనచో ఒకటి లేదా రెండు రోజుల జాప్యంతో ట్రాన్స్మిషన్ను డిపార్ట్మెంట్ వెహికల్ ద్వారానే తరలించడం జరుగుతున్నది. అతి తక్కువ సందర్భాలలో వెహికల్ అందుబాటులో లేనిచో రైతులు తమ ఇష్టప్రకారమే ట్రాన్స్మిషన్ రవాణా చేయుచున్నారు</p>

2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ కారేపల్లి నారాయణ్ రెడ్డి, వెంకటాపూర్ గ్రామము నిర్మల్ మండలం, నిర్మల్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>మా జిల్లాలో కరెంటు సమస్యలు ట్రాన్సామిషన్ కాలిపోయిన సంధర్భములో మీరు ట్రాన్సామిషన్ తీసుకొనిరండి తీసుకొనిపోండి అని AE గారు సమాధానం. వెహికల్ అందుబాటులో లేదు అని AE గారి సమాధానం. ట్రాన్స్ఫర్మ్ DTR రైతులే చేసుకుంటున్నారు. కావున మాకు వెహికల్ అందుబాటులో ఉంచండి.</p>	<p>ఫెయిల్ అయిన ట్రాన్సఫార్మర్ల రవాణా నిమిత్తం SPM వెహికల్ మరియు సబ్ డివిజన్ వెహికల్ అందుబాటులో ఉంచి ఎక్కువ శాతం తరలించడం జరుగుచున్నది. కానీ కొన్ని సమయాలలో ట్రాన్సఫార్మర్ ఫెయిల్ అయినట్లైతే ఒకటి లేదా రెండు రోజుల జాప్యంతో ట్రాన్సఫార్మర్ను డిపార్ట్మెంట్ వెహికల్ ద్వారానే తరలించడం జరుగుచున్నది. అతి తక్కువ సందర్భాలలో వెహికల్ అందుబాటులో లేనిచో రైతులు తమ ఇష్టప్రకారమే ట్రాన్సఫార్మర్లను రవాణా చేయుచున్నారు</p>
2.	<p>ఆన్-లైన్ లో చేసే సమయంలో ఆలస్యము జరుగుచున్నది. 10 రోజుల సమయం ట్రాన్సామిషన్ రిఫ్లేస్ చేయటానికి. మా పంటలు మొలక దశ వాడిపోయి నష్టం వస్తుంది. కావున మాకు న్యాయం చేయగలరు.</p>	<p>ఫెయిల్ అయిన ట్రాన్సఫార్మర్లు రిఫ్లేస్మెంట్ పైన ఉన్న అధికారులు ప్రతిరోజు పర్యవేక్షిస్తున్నారు. కావున పది రోజుల జాప్యం అనేది అనాధారితం. మాకు ఉన్న అధికారిక నిబంధనల రీత్యా ట్రాన్సఫార్మర్లు రిఫ్లేస్మెంట్ కొరకు ఉన్న గడువు 48 గంటలు మాత్రమే. ఇంతకుపూర్వం ఆన్లైన్ సమస్యలు తలెత్తినచో సంబంధిత కార్పొరేట్ ఆఫీసు అధికారులతో సంప్రదించి సమస్యను పరిష్కరించడం జరిగేది. కానీ సమస్య పరిష్కరణలో కొంత జాప్యము జరుగుతున్నా కారణంగా ప్రస్తుతం త్వరితగతిన సమస్య పరిష్కారం నిమిత్తం సర్కిల్ ఆఫీసు కు పూర్తి అధికారం ఇవ్వడం జరిగింది.</p>

2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదనలు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనలపై  
 శ్రీ సి. రవీందర్ రెడ్డి, హస్నాపూర్, గ్రామం, తాంసీ మండలం, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>మా గ్రామములో 10 ట్రాన్స్ఫార్మర్ (DTR)లకు ఆన్-ఆఫ్ లేక కరెంటు అంతరాయం వచ్చినప్పుడు LC తీసుకోవటంవలన ఇతర కనూమర్లకు ఇబ్బంది కరంగా ఉన్నది. కావున ఈ పది ట్రాన్స్ఫార్మర్ లకు ఆన్-ఆఫ్ చేయించగలరు మరియు గ్రామంలోని ట్రాన్స్ఫార్మర్లకు (ఫెన్సింగ్) కంచె వేయించగలరు. మాకు న్యాయం చేయగలరు. అధికారులకు ఎన్ని సార్లు చెప్పినా చేయలేదు. కావున మాకు న్యాయం చేయగలరు.</p>	<p>అన్ని 63 kVA &amp; 100 kVA DTRలకు 11 KV AB స్విచ్లు ఉన్నాయి. సాధారణంగా HVDS వ్యవస్థలో ఏర్పాటు చేయబడిన DTRలకు విడిగా AB స్విచ్లు అందించబడవు. వినియోగదారులకు అంతరాయాలను తగ్గించడానికి HVDS DTRలకు సాధారణంగా AB స్విచ్లు నియంత్రణ పాయింట్లో అందించబడతాయి. ప్రమాదానికి ఆస్కారం ఉన్న చోట DTRలకు ఫెన్సింగ్ ఏర్పాటు చేయడం జరుగుతుంది. గృహ సర్వీసులకుగాను సింగల్ పేజ్ 15 KVA DTRలు తగినంత ఎత్తుతో పోల్ మౌంట్ చేయబడినాయి.</p>
2.	<p>జి. రామ్ రెడ్డి చేను నుండి జి. పోచమ్మ చేను వరకు 11 KV లైన్ లూజుగా వుంది. వ్యవసాయ పనులకు ఆటంకం కలుగుతుంది. మనుషులకు గాని ట్రాక్టర్లకు గాని తాకే విధముగా వుంది. కావున దీనికి సంబంధించిన పోల్స్ ను నిర్మించి మరమ్మత్తులు చేయించగలరని కోరుతున్నాము.</p>	<p>11 KV లూజు లైన్స్ లో మధ్యస్థ స్థంబాలు వేయడానికి WBS నంబర్ T-2101-05-01-02-04-007 ద్వారా అంచనా వేసి, మంజూరు కోసం సమర్పించబడింది మరియు వీలైనంత త్వరగా పని పూర్తి చేయబడును.</p>

2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ సర్కాని భూమా రెడ్డి, జిందాపూర్ గ్రామం, ఆదిలాబాద్ రూరల్ మండలం, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	ఆదిలాబాద్ మండలంలోని జిందాపూర్ గ్రామములో చాలా ఎళ్లుగా 33 KV లైన్లు పోల్స్ వంగి రైతులకు చేనులో పంటలు వేసుకొనక ఇబ్బంది పడుతున్నారు. ఇట్టి లూజ్ లైన్ సరి చేయించగలరు. 10 పోల్స్ లైన్ కు అవసరము.	లూజు లైన్ కొరకు WBS నంబర్ T-2101-05-01-02-03-007 ద్వారా ఎస్టిమేట్ మంజూరు అయినది. ఒక నెలలో పని పూర్తి చేయబడును.
2.	జిందాపూర్ గ్రామము నుండి 2 సైడ్ గోట్వారి గ్రామం వరకు LT లైన్, 11 KV లైన్ లూజుగా ఉన్నాయి. AE గారికి ఎన్ని సార్లు చెప్పిన చేయలేదు. 15 పోల్స్ అవసరము ఎస్టిమేట్ వేయించి పని పూర్తిగా చేయగలరు. విద్యుత్ అధికారులకు ఎన్ని సార్లు చెప్పిన పని చేయలేదు. 4 సం.రాల నుండి ఇలాగే ఉన్నాయి. గ్రామము మధ్యలో ఉన్న ట్రాన్స్ఫార్మర్ DTR లకు 5 DTR లకు ఫెన్సింగ్, ఆన్-ఆఫ్ చేయించగలరు. చాలా ఇబ్బందిగా ఉన్నది చెరువుకు రెండవ పక్కల.	లూజు లైన్ కొరకు WBS నంబర్ T-2001-05-01-02-01-009 ద్వారా ఎస్టిమేట్ శాంక్షన్ అయినది. ప్రస్తుతం ఉన్న పంటల కారణంగా పని వాయిదా పడినది మరియు వీలైనంత త్వరగా పూర్తి చేయబడును. గృహ సర్వీసులకుగాను సింగల్ పేజ్ 15 KVA DTRలు తగినంత ఎత్తుతో పోల్ మౌంట్ చేయబడినాయి.

2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదనలు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనలపై  
 శ్రీ బద్దం అమరేందర్ రెడ్డి, జామ్మి గ్రామం, పోస్ట్ కప్పర్ల, తాంసీ మండల్, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>బద్దం గంగారెడ్డి, జాండి గ్రామము, తాంసీ మండలము, జిల్లా ఆదిలాబాద్ నాయొక్క పశువు ట్రాన్స్పోర్టర్ కు ఫెన్సింగ్ లేనికారణంగా కరెంటు షాకుతో పశువు చనిపోయినది. దానికి సంబంధించిన అన్ని పత్రములు AE గారికి ఇచ్చినాను. నాకు ATS No., ఇంత వరకు నాకు పశువు సంబంధించిన ఎంటువంటి నష్ట పరిహారం ఇవ్వలేదు. నాకు నా పశువుకు సంబంధించిన నష్టం అంచనా విలువ రూ.50 వేలు కావున నష్ట పరిహారము ఇప్పించి న్యాయం చేయగలరు. ఇప్పటికి దాదాపు సంవత్సరం అయినది.</p>	<p>రూ.40,000/- ఎక్స్గ్రేషియా ATS-008671 ద్వారా మంజూరు చేయబడింది. సంబంధిత వారికి త్వరలో అందజేయబడుతుంది.</p>

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ కాటిపల్లి వెంకట్ రెడ్డి, తలమడుగు గ్రామం, తలమడుగు మండల్, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL – సమాధానాలు
1.	లూజు లైన్లు తలమడుగు గ్రామములో కె. వెంకట రెడ్డి s/o మోహన్ రెడ్డి రెండు పోల్స్ అవసరం, ఇన్సులేటర్లు పలిగి పోయినవి.	లూజు లైన్లు కొరకు WBS నంబర్ T-2101-05-01-02-06-006 ద్వారా అంచనా వేసి, మంజూరు కోసం సమర్పించబడింది మరియు వీలైనంత త్వరగా పూర్తి చేయబడును.
2.	కాటిపల్లి వెంకట్ రెడ్డి (దుకాణం) s/o నారాయణ్ రెడ్డి రెండు పోల్స్ అవసరం ఇన్సులేటర్లు పగిలి పోయినవి.	
3.	మా గ్రామములోని ట్రాన్స్మార్కర్లకు ఫెన్సింగ్ లు అవసరం. 5 ట్రాన్స్మార్కర్లకు ఫెన్సింగ్ అవసరం. ఇవి పశువులకు, మనుషులకు ఇబ్బంది కరంగా ఉన్నాయి.	గ్రామంలోని 3-పేజ్ DTR ట్రాన్స్మార్కర్లకు ఫెన్సింగ్ అందుబాటులో ఉంది మరియు గృహ సర్వీసులకుగాను సింగల్ పేజ్ 15 KVA DTRలు తగినంత ఎత్తుతో పోల్ మౌంట్ చేయబడినాయి మరియు 3-పేజ్ DTR AB స్విచ్ ద్వారా ఆన్/ఆఫ్ ఏర్పాటు చేయబడింది.
4.	ట్రాన్స్మార్కర్ ట్రాన్స్ఫోర్మ్ రైతుల నుండి వసూలు చేస్తున్నారు. ట్రాన్స్మార్కర్ ట్రాన్స్ఫోర్మ్ 100 KVA లేదు అని AEల నుండి సమాధానం మీరే తెచ్చుకొండి మా వెహికల్ అందుబాటులో లేదు అని సమాధానం మరియు ట్రాన్స్మార్కర్ కాలిపోయిన సందర్భములో ఆన్-లైన్ చేయటానికి ట్రాన్స్మార్కర్ రీఫ్లేస్ చేయటానికి వారం, పది రోజులు పడుతుంది. ఈ సమయంలో పంటలు ఎండిపోయి నష్టం జరుగుచున్నది. మొలక దశలో మొలకలు మొలవక పంట ఎండిపోయి నష్టం జరుగుచున్నది. ఆన్-లైన్ చేయటానికి మా జిల్లాలో చాలా సమయం తీసుకుంటున్నారు AEలు.	2020-21 ఆర్థిక సంవత్సరంలో ఆదిలాబాద్ జిల్లాలో 881 DTRలు కాలిపోయాయి వాటికి గాను 617 DTRలు (70%) డిపార్ట్మెంట్ వాహనాల ద్వారా రవాణా చేయబడినవి మరియు 01.04.2021 నుండి 31.01.2022 వరకు 907 DTRలు కాలిపోయాయి. వాటికి గాను 797 DTRలు (87.87%) డిపార్ట్మెంట్ వాహనాల ద్వారా రవాణా చేయబడ్డాయి. SPM సెంటర్లో ఎటువంటి లోడింగ్ & అన్లోడింగ్ ఛార్జీలు చెల్లించకూడదనే సమాచారంతో నోటీసు బోర్డులు SPM సెంటర్లో ఏర్పాటు చేయడం జరిగింది. ఎవరైనా లేబర్ ఛార్జీలు అడిగితే కాల్/సమాచారం ఇవ్వడానికి సంబంధిత AE, ADE/SPM & DE/MRT నంబర్లు ప్రదర్శించ బడ్డాయి.



**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ చిలుకూరి వెంకట రెడ్డి, తాంసీ గ్రామం, తాంసీ మండలం, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>తాంసీ గ్రామములో లూస్ లైన్లు చాలా ఉన్నాయి. (1) కటకం ప్రమోద్ చేను (2) గోపిడి నారాయణ రెడ్డి చేను 2 బిట్లు ఉన్నాయి (3) చిలుక లక్ష్మి, గడ్డం నారాయణ రెడ్డి చేను (4) కె. ప్రమీల (5) కటకం సత్యనారాయణ (6) రాచారపు నర్సయ్య s/o గంగన్న (7) సోమ మహేందర్ రెడ్డి (8) రెడ్డి నారాయణ (9) సోమ గణేష్ రెడ్డి (10) బొంత మోహన్ రెడ్డి s/o లచ్చి రెడ్డి (11) తోట ఊశన్న చేను (12) తోట సురేష్ చేను s/o ఊశన్న</p> <p>5 DTR లకు మా గ్రామములో ఫెన్సింగ్, ఆన్-ఆఫ్ లు లేవు.</p>	<p>లూస్ లైన్లు సరి చేయడం కొరకు WBS నంబర్ T-2107-05-01-02-04-005 ద్వారా 38 మధ్య స్తంభాల కోసం ఎస్టిమేట్ వేయడమైనది. DTR ఫెన్సింగ్ మరియు AB స్విచ్చుల కొరకు ఎస్టిమేట్ WBS నంబర్ T-2101-05-01-02-04-015 ద్వారా అంచనా వేసి, మంజూరు కోసం సమర్పించబడింది. ఒక నెలలో పని పూర్తి చేయబడును.</p>
2.	<p>ట్రాన్స్ఫార్మర్ కాలిపోయినప్పుడు రైతులే ట్రాన్స్ఫర్ చేసుకుంటున్నారు. 100 KV DTR కు ట్రాన్స్ఫర్మర్ లేదు మీరే చేసుకోవాలని అంటున్నారు. ప్రతి సారి మా వెహికల్ అందుబాటులో లేదు మీరే తెచ్చుకోండి అని AE లు సమాధానం చెప్పతున్నారని అంటున్నారు. అక్కడ వెళ్లిన తరువాత SPM హమాలీ ఛార్జీలు రైతుల నుండి వసూలు చేస్తున్నారు. ట్రాన్స్ఫార్మర్ DTR కాలిపోయినప్పుడు చాలా ఆలస్యము జరుగుచున్నది. ప్రతి ట్రాన్స్ఫార్మరుకు వారం నుండి 15 రోజులు అవుచున్నది. ఆన్-లైన్ చేయుటకు ఆలస్యం జరుగుతున్నది. దీని సరి చేసి మాకు న్యాయం చేయగలరు.</p>	<p>2020-21 ఆర్థిక సంవత్సరంలో ఆదిలాబాద్ జిల్లాలో 881 DTRలు కాలిపోయాయి వాటికి గాను 617 DTRలు (70%) డిపార్ట్మెంట్ వాహనాల ద్వారా రవాణా చేయబడినవి మరియు 01.04.2021 నుండి 31.01.2022 వరకు 907 DTRలు కాలిపోయాయి. వాటికి గాను 797 DTRలు (87.87%) డిపార్ట్మెంట్ వాహనాల ద్వారా రవాణా చేయబడ్డాయి. SPM సెంటర్లో ఎటువంటి లోడింగ్ &amp; అన్లోడింగ్ ఛార్జీలు చెల్లించకూడదనే సమాచారంతో నోటీసు బోర్డులు SPM సెంటర్లో ఏర్పాటు చేయడం జరిగింది. ఎవరైనా లేబర్ ఛార్జీలు అడిగితే కాలి/సమాచారం ఇవ్వడానికి సంబంధిత AE, ADE/SPM &amp; DE/MRT నంబర్లు ప్రదర్శించ బడ్డాయి.</p>

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్పార్టీ ప్రతిపాదనల పై శ్రీ ఆడెపు శ్రీనివాస్, దేవాపూర్ గ్రామం, తలమడుగు మండలం, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL – సమాధానాలు
1.	<p>లూజ్ లైన్ ల గ్రామం దేవాపూర్ మండలము తలమడుగులో బైంగల నర్సిములు గ్రామము దేవాపూర్ మండలము తలమడుగు చేనులో లూజ్ లైన్లు మనుషులకు పశువులకు తగిలేవిదంగా ఉన్నాయి. కావున ఇట్టి లైన్లు చేయించగలరు. మా గ్రామములో ట్రాన్స్మార్మర్ కాల్సిపోయినప్పుడు మా వెహికల్ అందుబాటులో లేదు. మీరే తెచ్చుకోండి అని AE నుండి సమాధానం. SPM సెంటర్లో రైతుల నుండి హమాలీ ఛార్జీలు వసూలు చేస్తున్నారు. ట్రాన్స్ఫోర్మర్లకు ఫెన్సింగ్ చేయించాలి. 10 ట్రాన్స్మార్మర్ లకు ఫెన్సింగ్ మరియు ఆస్-ఆఫ్ లు లేవు చేయించగలరు.</p>	<p>లూజు లైన్లు కొరకు WBS నంబర్ T-2101-05-01-02-06-006 ద్వారా అంచనా సిద్ధం చేసి, మంజూరు కోసం సమర్పించబడింది మరియు వీలైనంత త్వరగా పూర్తి చేయబడును.</p> <p>2020-21 ఆర్థిక సంవత్సరంలో ఆదిలాబాద్ జిల్లాలో 881 DTRలు విఫలమయ్యాయి వాటికి గాను 617 DTRలు (70%) డిపార్ట్మెంట్ వాహనాల ద్వారా రవాణా చేయబడినవి మరియు 01.04.2021 నుండి 31.01.2022 వరకు 907 DTRలు విఫలమయ్యాయి వాటికి గాను 797 DTRలు (87.87%) డిపార్ట్మెంట్ వాహనాల ద్వారా రవాణా చేయబడ్డాయి. SPM సెంటర్లో ఎటువంటి లోడింగ్ &amp; అన్లోడింగ్ ఛార్జీలు చెల్లించకూడదనే సమాచారంతో నోటీసు బోర్డులు SPM సెంటర్లో ఏర్పాటు చేయడం జరిగింది. ఎవరైనా లేబర్ ఛార్జీలు అడిగితే కాల్/సమాచారం ఇవ్వడానికి సంబంధిత AE,ADE/SPM &amp; DE/MRT నంబర్లు ప్రదర్శించ బడ్డాయి.</p> <p>గృహ సర్వీసులకుగాను సింగల్ ఫేజ్ 15 KVA DTRలు తగినంత ఎత్తుతో పోల్ మౌంట్ చేయబడినాయి.</p>



2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై  
 శ్రీ ఎల్మ బగువాన్ రెడ్డి, కొత్త సాంగ్వి గ్రామము, బేలా మండల్, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	లూజ్ లైన్లు, ఎల్మ బగువాన్ రెడ్డి, కొత్త సాంగ్వి గ్రామము, మండల్ బేలా, జిల్లా ఆదిలాబాద్ రెండు పోల్స్ అవసరం పని చేయించగలరు.	LT లూజ్ లైన్లో 2 మధ్య స్తంభాలు త్వరలో ఏర్పాటు చేస్తాము.

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై**  
**శ్రీ పుండ్రు అశోక్ రెడ్డి, జైనథ్ గ్రామం, జైనథ్ మండల్, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>ట్రాన్సాస్మార్టర్ కాలిపోయినప్పుడు మా వెహికల్ అందుబాటులో లేదు. మీరే తెచ్చుకోండి అని AEలు సమాధానం ఇస్తున్నారు. 100 KV ట్రాన్సాస్మార్టర్ కు ట్రాన్స్ఫోర్మ్ లేదు అని సమాధానం ఇస్తున్నారు. హమాలీ ఛార్జీలు SPM సెంటర్ లో రైతుల నుండి వసూలు రూ.500 తీసుకుంటున్నారు.</p>	<p>2020-21 ఆర్థిక సంవత్సరంలో ఆదిలాబాద్ జిల్లాలో 881 DTRలు కాలిపోయాయి వాటికి గాను 617 DTRలు (70%) డిపార్ట్మెంట్ వాహనాల ద్వారా రవాణా చేయబడినవి మరియు 01.04.2021 నుండి 31.01.2022 వరకు 907 DTRలు కాలిపోయాయి. వాటికి గాను 797 DTRలు (87.87%) డిపార్ట్మెంట్ వాహనాల ద్వారా రవాణా చేయబడ్డాయి. SPM సెంటర్లో ఎటువంటి లోడింగ్ &amp; అన్లోడింగ్ ఛార్జీలు చెల్లించకూడదనే సమాచారంతో నోటీసు బోర్డులు SPM సెంటర్లో ఏర్పాటు చేయడం జరిగింది. ఎవరైనా లేబర్ ఛార్జీలు అడిగితే కాల్/సమాచారం ఇవ్వడానికి సంబంధిత AE,ADE/SPM &amp; DE/MRT నంబర్లు ప్రదర్శించ బడ్డాయి.</p>
2.	<p>ట్రాన్సఫార్మర్ కు ఫెన్సింగ్ లేవు. గ్రామంలో ఉన్న ట్రాన్సాస్మార్టర్లతో మనుషులకు పశువులకు ఇబ్బంది కరంగా ఉన్నది. 10 ట్రాన్సాస్మార్టర్లకు ఫెన్సింగ్ మరియు ఆన్-ఆఫ్ చేయించ గలరు.</p>	<p>ప్రమాదాలను నివారించడానికి 3 DTRల ఫెన్సింగ్ మరియు 4 T/T 200A AB స్విచ్ల ఏర్పాటు కోసం WBS నెం.T-2101-05-01-02-02-016 ద్వారా ఎస్టిమేట్ వేసి శాంక్షన్ కోసం సమర్పించబడింది. వీలైనంత త్వరగా పనులు పూర్తి చేయడం జరుగుతుంది.</p>
3.	<p>లూజ్ లైన్లు</p>	

2022-23 ఆర్థిక సంవత్సరానికి రిఫైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదనలు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ గోక సుదర్శన్ రెడ్డి s/o పోత రెడ్డి, హస్తాపూర్ గ్రామం, తాంసీ మండల్, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	11 kv లైన్ కుమ్మరి అశోక్ ఇంటి పోల్ నుండి కంది సుభాష్ రెడ్డి చేనులో గల ట్రాన్స్ఫార్మర్ వరకు 11 kv లైన్ లూజ్ ఉండటం వలన వ్యవసాయ పనులకు ఇబ్బంది కలుగుతున్నది. కావున దానికి పోల్ లను నిర్మించి 11 kv లైన్ ను మరమ్మత్తు చేయించగలరు.	కుమ్మరి అశోక్ చేనులో వ్యవసాయ పనులకు ఇబ్బంది కలగకుండా మధ్యస్థ స్థంబాల కొరకు WBS నెం.T-2101-05-01-02-04-007 ద్వారా ఎస్టిమేట్ వేసి శాంక్షన్ కోసం సమర్పించబడింది. వీలైనంత త్వరగా పనులు పూర్తి చేయడం జరుగుతుంది.

2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై  
 శ్రీ కామ్రె నరేందర్, రాంనగర్ పాలడి గ్రామం, తాంసీ మండలం, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>మా చేసులో లూస్ లైన్ మనుషులకు, పశువులకు తగిలేవిధంగా ఉన్నాయి. కావున చేయించి మాకు న్యాయం చేయగలరు. CGRF కంప్లైంట్ ఇచ్చినాము పని కాలేదు. పని చేయించి న్యాయము చేయగలరు.                      CGRF CG No.650.</p>	<p>కామ్రె నరేందర్ కు చెందిన వ్యవసాయ స్థలంలో 1 పోల్ వేయడమైనది మరియు త్వరలో పని పూర్తవుతుంది.</p>

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనలపై**  
**శ్రీ కళ్యాణ రమేష్ రెడ్డి, చిన్నపల్లి గ్రామం, తలమడుగు మండలం, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>కళ్యాణ రమేష్ రెడ్డి, చిన్నపల్లి గ్రామం, తలమడుగు మండలం, ఆదిలాబాద్ జిల్లా - మా గ్రామములోని మొత్తం పోల్స్ విరిగిపోయి సిమెంట్ నుండి రాడ్ కనిపిస్తున్నాయి ఎప్పుడు విరిగి పడుతాయో తెలియదు. ఈ పోల్స్ మొత్తం తీయించి కొత్త పోల్స్ వేయించగలరు. 15 పోల్స్ ఇలాంటి పరిస్థితి ఉన్నది. ట్రాన్స్ఫార్మర్ కాస్ట్ AGL ఎస్టిమేట్ వేయకూడదని G.O నెం.2013 లో ఉన్నది. మా జిల్లాలో ట్రాన్స్ఫార్మర్ కాస్ట్ వేసి ORC ఇస్తున్నారు. కావున మాకు న్యాయం చేయగలరు.</p>	<p>ఇప్పటికే 7 స్తంభాలను ఏర్పాటు చేయడమైనది , మిగిలిన 8 స్తంభాలను వీలైనంత త్వరగా ఏర్పాటు చేయబడును.  ప్రతి కొత్త HT &amp; LT భాగం కలిగిన వ్యవసాయ సర్వీసు కనెక్షన్ కోసం TSNPDCL రూ.70,000/- భరిస్తుంది. ప్రతి కొత్త LT భాగం కలిగిన వ్యవసాయ సర్వీసు కనెక్షన్ కోసం TSNPDCL రూ.40,000/- భరిస్తుంది. దీని గురించి రెగ్యులేషన్ సూచించదు.</p>
2.	<p>ట్రాన్స్ఫార్మర్ కాలిపోయినప్పుడు మా జిల్లాలో పూర్తిగా రైతులే భరిస్తున్నారు. మా వెహికల్ అందుబాటులో DTR లేదు మీరే తీసుకోని వచ్చి ట్రాన్స్ఫార్మర్ DTR తీసుకుపోండి అని AE గారి సమాధానం. కావున మాకు వెహికల్ అందుబాటులో ఉంచి మాకు న్యాయం చేయగలరు.</p>	<p>2020-21 ఆర్థిక సంవత్సరంలో ఆదిలాబాద్ జిల్లాలో 881 DTRలు కాలిపోయాయి వాటికి గాను 617 DTRలు (70%) డిపార్ట్మెంట్ వాహనాల ద్వారా రవాణా చేయబడినవి మరియు 01.04.2021 నుండి 31.01.2022 వరకు 907 DTRలు కాలిపోయాయి. వాటికి గాను 797 DTRలు (87.87%) డిపార్ట్మెంట్ వాహనాల ద్వారా రవాణా చేయబడ్డాయి. SPM సెంటర్లో ఎటువంటి లోడింగ్ &amp; అన్లోడింగ్ ఛార్జీలు చెల్లించకూడదనే సమాచారంతో నోటీసు బోర్డులు SPM సెంటర్లో ఏర్పాటు చేయడం జరిగింది. ఎవరైనా లేబర్ ఛార్జీలు అడిగితే కాలి/సమాచారం ఇవ్వడానికి సంబంధిత AE,ADE/SPM &amp; DE/MRT నంబర్లు ప్రదర్శించబడ్డాయి.</p>

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ పాన్ పట్టి మారుతీ రావు, జాండి గ్రామం, ఇచ్చోడ మండలం, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL – సమాధానాలు
1.	పాన్ పట్టి మారుతీ రావు, గ్రామము జాండి, మండలం ఇచ్చోడ. మాకు మోటారు కనెక్షన్ కు ఫోల్స్ వేసినారు కానీ లైన్ వేయలేదు. లైన్ వేసి మా యొక్క సర్వీస్ పునరుద్ధరించ గలరు. SS నెం.35 Jamdi.	ఒక 8.0 మీటర్ల PSCC ఫోల్ ఏర్పాటు చేయబడింది మరియు లైన్ కూడా వేసి ఉంది. SC No.35 శ్రీ పి.మారుతీ రావుకు సరఫరా ఇప్పటికే అందుబాటులో ఉంది.
2.	ట్రాన్స్ఫార్మర్ కాళి పోయిన సమయంలో పునరుద్ధరించడానికి 10 నుండి 15 రోజులు పడుతుంది. ఆన్-లైన్ చేయటానికి చాలా సమయం పడుతుంది. ట్రాన్స్ఫార్మర్ ట్రాన్స్ఫర్మర్ రైతులు చేసుకుంటున్నారు. AE గారు మా వెహికల్ అందుబాటులో లేదు మీరే తీసుకోని వచ్చి తీసుకోని పోండి అని AE సమాధానం వస్తుంది. కావున మాకు న్యాయం చేయగలరు.	DTR కాళిపోయిన విషయము సిబ్బంది దృష్టికి వచ్చిన తరువాత పునరుద్ధరించడం జరుగుతుంది. SPM సెంటర్లో ఎటువంటి లోడింగ్ & అన్లోడింగ్ ఛార్జీలు చెల్లించకూడదనే సమాచారంతో నోటీసు బోర్డులు SPM సెంటర్లో ఏర్పాటు చేయడం జరిగింది. ఎవరైనా లేబర్ ఛార్జీలు అడిగితే కాల్/సమాచారం ఇవ్వడానికి సంబంధిత AE,ADE/SPM & DE/MRT నంబర్లు ప్రదర్శించ బడ్డాయి.

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ హరూన్ రామేశ్వర్, జమిది గ్రామం, ఇచ్చోడ మండలం, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>DTR కాలిపోయిన సమయంలో DTR తీసుకోని రండి, DTR తీసుకోని పోండి అని AE గారి సమాధానం. మా వెహికల్ అందుబాటులో లేదు. 100 KVA ట్రాన్స్ఫార్మర్ కు ట్రాన్స్ఫర్మర్ లేదు అని AE సమాచారం. కావున మాకు వెహికల్ అందుబాటులో ఉంచి మాకు న్యాయం చేయగలరు. ట్రాన్స్ఫార్మర్ కాలిపోయిన సందర్భములో 10 రోజులు పడుతుంది. ఈ ఆలస్యము వలన మాకు మొలక దశలో ఉన్న పంటలు ఎండి పోయి చాలా నష్టం జరుగుతుంది. కావున న్యాయం చేయగలరు.</p>	<p>2020-21 ఆర్థిక సంవత్సరంలో ఆదిలాబాద్ జిల్లాలో 881 DTRలు కాలిపోయాయి వాటికి గాను 617 DTRలు (70%) డిపార్ట్మెంట్ వాహనాల ద్వారా రవాణా చేయబడినవి మరియు 01.04.2021 నుండి 31.01.2022 వరకు 907 DTRలు కాలిపోయాయి వాటికి గాను 797 DTRలు (87.87%) డిపార్ట్మెంట్ వాహనాల ద్వారా రవాణా చేయబడ్డాయి. SPM సెంటర్లో ఎటువంటి లోడింగ్ &amp; అన్లోడింగ్ ఛార్జీలు చెల్లించకూడదనే సమాచారంతో నోటీసు బోర్డులు SPM సెంటర్లో ఏర్పాటు చేయడం జరిగింది. ఎవరైనా లేబర్ ఛార్జీలు అడిగితే కాల్/సమాచారం ఇవ్వడానికి సంబంధిత AE,ADE/SPM &amp; DE/MRT నంబర్లు ప్రదర్శించ బడ్డాయి.</p>

2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదనలు మరియు క్రాస్ సబ్సిడీ సర్కార్డి ప్రతిపాదనలపై శ్రీమతి చింతపల్లి రూప, పొన్నారి గ్రామం, తాంసీ మండలం, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>(1) చింతపల్లి స్వామి s/o చిన్నన్న గ్రామము పొన్నారి - 2 పశువులు ATS No.009471            (2) చింతపల్లి భూమా రెడ్డి, s/o రాములు, పొన్నారి గ్రామము - 1 పశువు ATS No.9471            (3) చింతపల్లి రూప w/o స్వామి రెడ్డి గ్రామము పొన్నారి - 1 పశువు ATS No.009471</p> <p>మా యొక్క పశువులు 01/10/2021 నాడు నాలుగు పశువులు చనిపోయినవి మాకు రావలసిన కంపెన్సేషన్ రాలేదు. కావున నగదు రూపాయలు ఇప్పించగలరు.</p>	<p>రూ.1,60,000/- ఎక్స్ గ్రేషియా మంజూరు చేయబడింది (పశువుకు రూ.40,000/- చొప్పున). త్వరలో సంబంధిత వారికి అందజేయ బడుతుంది.</p>



**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ సరసాని భూమా రెడ్డి, జాండి గ్రామం, తాంసీ మండల్, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>మా గ్రామములోని DTR లు ట్రాన్స్ఫార్మర్లు 5 ఇంటికి ఆన్-ఆఫ్ లు లేవు మరియు గ్రామములో ఉన్నటువంటి వాటికి ట్రాన్స్ఫార్మర్ కు కంచె ఫెన్సింగ్ లేదు. 5 DTR లకు ఫెన్సింగ్ చేయించగలరు. ట్రాన్స్ఫార్మర్ కాళిపోయి దాదాపుగా 3 నెలలు ఐనది. ఎన్నిసార్లు విన్నవించినా పని చేయలేదు. ట్రాన్స్ఫార్మర్ నెం.1 గ్రామము మధ్యలో ఉన్నది. ఇంట్లు మరియు ప్రజలకు చాలా ప్రమాదకారిగా ఉన్నది. దీనిని పిష్టింగ్ చేయించగలరు. ట్రాన్స్ఫార్మర్ కాళిపోయిన ఎడల ట్రాన్స్ఫార్మర్ రైతులే ట్రాన్స్ఫోర్డ్ చేయవలసి వస్తున్నది. ఆన్-లైన్ బుకింగ్ చాలా ఆలస్యముగా చేయుచున్నారు. 10 నుండి 15 రోజులు ట్రాన్స్ఫార్మర్ రిపేర్ చేయించటానికి పడుతుంది. దీని వలన రైతుల పంటలు మొలక దశలో ఎండిపోయి సమయానికి నీరు అందక చాలా పంట నష్టం, ఆలస్యము జరిగి రైతులు నష్టపోవలసి వస్తుంది. రైతులు DTR రిపేర్ కొరకు తీసుకువచ్చినప్పుడు రైతులనుండి హమాలీ ఛార్జీలు తీసుకుంటున్నారు.</p>	<p>గృహ సర్వీసులకుగాను సింగల్ పేజ్ 15 KVA DTRలు తగినంత ఎత్తుతో పోల్ మౌంట్ చేయబడినాయి. DTR పిష్టింగ్ ఛార్జీలు గ్రామ సర్పంచ్ సమ్మతి పత్రము ఇచ్చి తగిన ఛార్జీలు చెలించిన పిదప పనిని చేపట్టబడుతుంది. 2020-21 ఆర్థిక సంవత్సరంలో ఆదిలాబాద్ జిల్లాలో 881 DTRలు కాళిపోయాయి వాటికి గాను 617 DTRలు (70%) డిపార్ట్మెంట్ వాహనాల ద్వారా రవాణా చేయబడినవి మరియు 01.04.2021 నుండి 31.01.2022 వరకు 907 DTRలు కాళిపోయాయి వాటికి గాను 797 DTRలు (87.87%) డిపార్ట్మెంట్ వాహనాల ద్వారా రవాణా చేయబడ్డాయి. SPM సెంటర్లో ఎటువంటి లోడింగ్ &amp; అన్లోడింగ్ ఛార్జీలు చెల్లించకూడదనే సమాచారంతో నోటీసు బోర్డులు SPM సెంటర్లో ఏర్పాటు చేయడం జరిగింది. ఎవరైనా లేబర్ ఛార్జీలు అడిగితే కాల్/సమాచారం ఇవ్వడానికి సంబంధిత AE, ADE/SPM &amp; DE/MRT నంబర్లు ప్రదర్శించ బడ్డాయి.</p>

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై**  
**శ్రీ టి. విట్టల్ రెడ్డి, సర్పంచ్, సాంగ్వి కే గ్రామము, జైనద్ మండలం, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	సాంగ్వి కే గ్రామములో కొత్త సాంగ్వి నుండి మెయిన్ రోడ్ వరకు స్ట్రీట్ లైట్స్ 9 పోల్స్	సాంగ్వి కే గ్రామములో కొత్త సాంగ్వి నుండి మెయిన్ రోడ్ వరకు స్ట్రీట్ లైట్స్ 9 పోల్స్ కొరకు పని చేపట్టడానికి ఎస్టిమేట్ డబ్బులు కట్టడానికి సాంగ్వి (కె) సర్పంచ్ ముందుకు రావడం లేదు.
2.	మరియు పాత సాంగ్వి గ్రామ పంచాయితీ నుండి స్మశాన ఘాట్ వరకు 7 పోల్స్ వేసినారు కానీ ఇంతవరకు లైన్ కనెక్షన్ ఇవ్వలేదు. లైన్ గుంజి కనెక్షన్ ఇప్పించగలరు.	TSNPDCL సిబ్బంది ఆ పోల్స్ వేయ లేదు. కావున లైన్ కనెక్షన్ ఇవ్వలేదు. సర్పంచ్ సమ్మతి పత్రం ఇచ్చినచో ఎస్టిమేట్ వేసి చెల్లింపు జరిగిన వెంటనే పని చేయ గలము.
3.	గ్రామములో లూజు లైన్లు చాలా వున్నాయి. వీటికి 5 పోల్స్ అవసరము. ఇవి మనుషులకు, పశువులకు తగిలేవిధంగా ఉన్నాయి.	అవాంఛనీయ సంఘటనలు అరికట్టడం కోసం 10 LT ఇంటర్ పోల్లను WBS నెం.T-2107-05-01-02-03-011 ఎస్టిమేట్ ద్వారా మంజూరు కోసం సమర్పించబడింది. వీలైనంత త్వరగా పనులు పూర్తి చేయబడును.

2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదనలు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనలపై శ్రీ సర్సాని గోవర్ధన్ రెడ్డి, బండల నాగపూర్ గ్రామం, తాంసీ మండల్, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>సర్సాని గోవర్ధన్ రెడ్డి, బండల నాగపూర్ గ్రామం, తాంసీ మండల్, ఆదిలాబాద్ జిల్లా నా యొక్క చేనులో లూజు లైన్లు ఉన్నాయి. గా రెండు సంవత్సరములుగా విద్యుత్ అధికారులకు తెలియ జేస్తూనే ఉన్నాను కానీ ఇంతవరకు పని కాలేదు. లూజు లైన్లు మనుషులకు, పశువులకు తగిలే విధంగా చాలా ప్రమాదకరంగా ఉన్నాయి. కానీ ఇంతవరకు పని కాలేదు. మా పని చేయించి మాకు న్యాయం చేయగలరు. మాకు విద్యుత్ ప్రమాదం నుండి కాపాడి మాకు లైన్ ను పునరుద్ధరించ గలరు. 8 పోల్స్ అవసరము. మాకున్యాయం చేయగలరు. గ్రామం జామిడి బండ్ల నాగపూర్ మధ్యలో శ్రీధర్ రెడ్డి రోడ్ తోట వద్ద లైన్లు లూజుగానే ఉన్నాయి. మాకు ప్రమాదం నుండి రక్షించి మాకు న్యాయం చేయగలరు.</p>	<p>లూస్ లైన్లు సరి చేయడం కొరకు WBS నంబర్ T-2107-05-01-02-04-005 ద్వారా మధ్య స్తంభాల కోసం ఎస్సెమ్ఎట్ వేయడమైనది.</p>

2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదనలు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనలపై శ్రీ కూట వెంకట్ రెడ్డి, బండ్ల నాగపూర్ గ్రామము, తాంసి మండలం, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	<p>నా పేరు కూటవెంకట్ రెడ్డి, బండ్ల నాగపూర్ గ్రామము, తాంసి మండలం, ఆదిలాబాద్ జిల్లా నేను గత రెండు సంవత్సరములుగా విద్యుత్ డిపార్టుమెంటు వారి దృష్టికి తీసుకోని వచ్చినాను. మా చేసులో లూజు లైన్లు మనుషులకు, పశువులకు తగిలేవిధంగా ఉన్నాయి. ఇవి చాలా ప్రమాదకరంగా నే ఉన్నాయి. కానీ ఎన్ని సార్లు విన్నవించినా పని కాలేదు. ఇక్కడ ఆరు పోల్స్ అవసరము ఉన్నది. కావున ఇట్టి పని పూర్తి చేయించి మాకు ప్రమాదం నుండి రక్షించి న్యాయం చేయగలరు.</p>	<p>లూస్ లైన్లు సరి చేయడం కొరకు మధ్య స్తంభాల కోసం ఎస్టిమేట్ వేయడమైనది.</p>

2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ అల్లూరి రామ రెడ్డి, బండ్ల నాగరావు గ్రామము, తాంసి మండల్, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	గత సంవత్సరము 13/01/2021 నాడు మీ-సీవలో చాలన్ (DD) కట్టినాను. నాకు ఇంతవరకు కరెంటు మోటారు కనెక్షన్ ఇవ్వలేదు. CGRF లో కేసువేసినాను. ఇంతవరకు పని కాలేదు. నాకు మోటారు కనెక్షన్ ఇప్పించగలరు. మాకు న్యాయం చేయగలరు.	కరెంటు మోటారు కనెక్షన్ సరఫరా కోసం ఎస్టిమేట్ WBS నంబర్ A-2101-05-01-02-04-007 ద్వారా మంజూరు చేయబడింది. డిమాండ్ నోటీసు రూ.70,638/- జారీ చేయబడింది. దరఖాస్తుదారు ORC మొత్తాన్ని చెల్లించలేదు.

**2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై శ్రీ సాయ గణేష్ రెడ్డి, జామిడి గ్రామము, తాంసి మండలం, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	బద్లం గంగా రెడ్డి చెనులో ఉన్న ట్రాన్స్ఫార్మర్ DTR నెం.3 100 KVA DTR వున్నది కానీ 28 మోటార్లు నడుస్తున్నవి. దీనికి ఓవర్ లోడ్ ఉన్నది అని గతములో ఎన్నిసార్లు విన్నవించినా విద్యుత్ అధికారులు పట్టించుకోలేదు. కావున ఇట్టి ట్రాన్స్ఫార్మర్ ఓవర్ లోడ్ తీసివేసి మాకు న్యాయం చేయగలరు. మాకు మరో కొత్త ట్రాన్స్ఫార్మర్ ఇప్పించగలరు. మాకు న్యాయం చేయగలరు.	28 వ్యవసాయ మోటార్లలో 20 అధికారిక సర్వీసులు మరియు మిగిలిన 8 అనధికార కనెక్షన్లు ఉన్నాయి. ఈ అనధికార కనెక్షన్లు క్రమబద్ధీకరణ కోసం మీ సేవలో అవసరమైన ఛార్జీలను చెల్లించమని వినియోగదారులకు తెలియజేయడమైనది. చెల్లించిన పిదప కొత్త ట్రాన్స్ ఫార్మర్ అమర్చ బడుతుంది.

2022-23 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై  
శ్రీ దేవల్ల ఎల్లయ్య, జైనద్ గ్రామం & మండలం, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	దేవల్ల ఎల్లయ్య, జైనద్ గ్రామము 2020 సంవత్సరములో చనిపోయిన దేవల్ల పార్వతి వయస్సు 58 సంవత్సరములు కరెంటు వైర్లు తగిలి చనిపోయినది. ఇంత వరకు ఎక్స్ గ్రేషియా అందలేదు. కావున మాకు న్యాయం చేయగలరని మనవి.	రూ.5,00,000/- పరిహారం ATS-006808 నంబరుతో మంజూరు చేయబడినది. వీలైనంత త్వరగా దేవల్ల పార్వతి సంబంధీకులకు అందజేయడం జరుగుతుంది.

**2022-23 ఆర్థిక సంవత్సరానికి రిలైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై**  
**శ్రీ బోడకుంటి ప్రవీణ్, గ్రామం డోప్ టలా గ్రామం, బేలా మండలం, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాధానాలు
1.	గ్రామము డోప్ టలా, మండలం బేలా, జిల్లా ఆదిలాబాద్ మేము గత రెండు సంవత్సరముల క్రితము D.D.లు కట్టినాము. దానికి సంబంధించిన పని ఇంత వరకు కాలేదు. CGRF కంప్లైంట్ ఇచ్చినాము కానీ ఇంత వరకు పని కాలేదు. ORC కట్టినాము కానీ పని కాలేదు. కావున పని చేయించి మాకు న్యాయం చేయగలరు. గత రెండు సీజన్ లుగా మేము పంట నష్టపోయినాము.	స్థానికులు అడ్డు చెప్పడం వలన పని చేయడంలో జాప్యం జరిగినది. పని చేయడానికి వినియోగదారులను ఒప్పించడానికి ప్రయత్నిస్తున్నాము. వివాదం పరిష్కరించిన తరువాత పని చేపట్టడం జరుగుతుంది.



**2022-23 ఆర్థిక సంవత్సరానికి రిటైర్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదనలు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల పై**  
**శ్రీ గోక రామ రెడ్డి, s/o భూమా రెడ్డి, హుస్సాపూర్ గ్రామం, ఆదిలాబాద్ జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL – సమాధానాలు
1.	<p>మీటరు నెం.00452 ఇంటి నెం.- శ్రీమతి గోక కవిత w/o రామ రెడ్డి గత సంవత్సరము 2020 ఆగస్టు నెలలో D.D. కట్టినాను. నాకు మీటరు నెం. గత నెలలో వచ్చినది. కానీ ఇంత వరకు బిల్లు రాలేదు. ఆన్-లైన్ చేయించి బిల్లు ఇప్పించగలరు. విద్యుత్ అధికారులకు ఎన్నో సార్లు చెప్పినా పని కాలేదు. నాకు న్యాయమైన బిల్లు ఇచ్చి నాకు న్యాయం చేయగలరు. మా గ్రామము హుస్సాపూర్.</p>	<p>తాంసి సెక్షన్ లోని హుస్సాపూర్ గ్రామంలో శ్రీమతి గోక కవిత w/o రామ రెడ్డి గారి సర్వీసు నెం.60329-00452తో విడుదల చేశారు మరియు బిల్ కూడా ఇవ్వడం జరిగినది.</p>