

**SOUTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED**



**RESPONSES TO OBJECTIONS / SUGGESTIONS**

**On**

**ARR & Tariff Filings Proposals of Retail Supply Business for FY 2022-23**

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| 161          | <a href="#">M.Pochaiiah</a> , Mitta kanakal village, pudur (md), kadumoor post vikarabad Dist ,M.No.8106370626                 | 484           |
| 162          | <a href="#">Madireddy Raji Reddy</a> , 20-160/1/1, R.B.NAGAR, Near Pochamma Temple, Shamshabad, RR District                    | 209           |
| 163          | <a href="#">G Gajender S/o</a> : Bheemaiah, 3-6, Nagerkunta Vill, Shabad Mdl, RR District                                      | 485           |
| 164          | <a href="#">Bojarajula Masaiah</a> , Mustipally Katti & Edira Vill Kandurg Mdl., Jadcherla Post, RR District                   | 486           |
| 165          | <a href="#">Gorla Balaiah</a> , Mustipally Katti & Edira Vill Kandurg Mdl., Jadcherla Post, RR District                        | 487           |
| 166          | <a href="#">Anupuram Narasimlu</a> , S/o: Chandraiah, Daivalagudem Vill, Nagarkunta, Shabad Mdl., RR District                  | 488           |
| 167          | <a href="#">T Shivakumar</a> , S/o: Narasimlu, 2-7/2, Daivalagudem Vill, Nagarkunta, Shabad Mdl., RR District                  | 489           |
| 168          | <a href="#">Kadamanchi Mahendar S/o</a> Jangaiah, 2-2, Daivalagudem Vill, Nagarkunta, Shabad Mdl., RR District – 509217        | 490           |
| 169          | <a href="#">E Venkat Ramulu S/o</a> Eshwaraiah Goud, Sarpanpallu Vill, Gottimukla Post, Vikarabad Md & Dist                    | 491           |
| 170          | <a href="#">Tallapally Srinu S</a> , 4-15, Daivalagudem Vill, Shabad Mdl & Posr., RR District – 509217                         | 493           |
| 171          | <a href="#">Miryala Dasharadha S/o</a> : Venkanna, Edira Vill, Kandurg Mdl., Jadcherla Post, RR District                       | 494           |
| 172          | <a href="#">Taruti Narasimlu</a> , Edira Vill, Kandurg Mdl., Jadcherla Post, RR District                                       | 495           |
| 173          | <a href="#">Kanna Yellaiah S/o</a> Pochaiiah, Edira Vill, Kandurg Mdl., Jadcherla Post, RR District                            | 496           |
| 174          | <a href="#">Kanna Raju S/o</a> Bheemaiah, Edira Vill, Kandurg Mdl., Jadcherla Post, RR District                                | 497           |
| 175          | <a href="#">T Thirupathi S/o</a> Anjaiah, 4-7, Daivalagudem Vill, Shabad Mdl & Posr., RR District – 509217                     | 498           |
| 176          | <a href="#">Gunti Pedda Narayana S/o</a> Rayanna, 10-87, Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215                | 499           |
| 177          | <a href="#">Madyapaga Venkataiah</a> , Amdapur Village, Moinabad (Mandal), Ranga Reddy (dist)                                  | 500           |
| 178          | <a href="#">Madi Ranga Reddy</a> , S/o Pedda Yellareddy, Kashimcheli (Village), Moinabad (Mndal), Ranga Reddy Dist             | 501           |
| 179          | <a href="#">Kadamanchi Mallesha S/O</a> Pochaiiah, 4-47, Daiwalaguda, Shabad (P & M), R R District, Mobile : 9640196764        | 502           |
| 180          | <a href="#">E Srinivasa Chari</a> , Energy Conservation Mission, IEITSC Hyderabad  | 503           |
| 181          | <a href="#">Devulapally Venkatesh</a> , H.No.13-2-176,Devulapalli Sahithya Sadan,Warangal                                      | 515           |
| 182          | <a href="#">Saurobrota Dutta</a> , Hemanth Sahay Associates,81/1,Adchini,Sri Aurobindo Marg,New Delhi-110017                   | 518           |
| 183          | <a href="#">V Veerappa chary S/o</a> : Ramulu, 1-101, Nagarkunta Vill, Shabad P & M, RR District – 509217, Mobile : 9949199131 | 519           |
| 184          | <a href="#">Kavali Darshan S/O</a> Ramchandraiah, Keesaram Vill, Shabad (M), R R District – 509217, Mobile : 9989929044        | 520           |
| 185          | <a href="#">Lingala Chinnaramchandraiah</a> , J-53, Shambad M, RR District - 509217 ,Mobile : 9701281370                       | 521           |



1. **M. Venugopala Rao**, Senior Journalist & Convener, Centre for power studies, H.No.1-100/MP/101, Monarch Prestige, Journalists colony, Serilingampally Mandal, Hyderabad-500 032, Cell No.9441193749, e-mail vrmummareddi@gmail.com

| 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. Hence, TS Discoms believe that the proposed tariff hike is inevitable and justified to improve its financial condition and better customer</p> |

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|   |  | service and accordingly request the Hon'ble Commission to approve the same after due regulatory proceedings.  |
| 2 | <p><b>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.</b></p> | <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 | <p><b>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 subsidy and Government's subsidy also to subsidized categories of consumers over</b></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. 4,415 Crs. with respect to the power supply to agriculture consumers. Thus, no hike is necessary for some categories like LT agriculture.</p>   |

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|   | <p>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 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.</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 SPDCL. 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 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> <p>In view of the above, Discoms have proposed the hike in Fixed Charges, Consumer charges &amp; minimum charges.</p> <p>TS Discoms believe that there is a significant gap between the fixed costs incurred (FC paid to Genco, Transmission (STU, PGCIL) &amp; SLDC charges, and Distribution Fixed Cost) and the fixed charges</p>  |

|        |   | <p>recovered from the consumers.<br/>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><b>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.</b></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.<br/>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><b>The State Government provided yearly subsidy (In Rs. crores) as under:</b></p> <table border="1"> <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></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>   | Discom  | 2018-19 | 2019-20 | 2020-21 | 2021-22 | 2022-23 |  |  |  |  |  |  | <p>TS Discoms would like to state that it is unfair on the part of the objector to question the intentions of the GoTS.<br/>Govt. of Telangana has been adopting the following steps to improve</p> |
| Discom | 2018-19   | 2019-20   | 2020-21 | 2021-22 | 2022-23 |         |         |  |  |  |  |  |  |   |
|        |   |   |         |         |         |         |         |  |  |  |  |  |  |   |

|   |                |                |                |                |                |                |              |                |                |                |                |                |              |                |                |                |                |                |   |
|---|----------------|----------------|----------------|----------------|----------------|----------------|--------------|----------------|----------------|----------------|----------------|----------------|--------------|----------------|----------------|----------------|----------------|----------------|---|
| <table border="1"> <tr> <td><b>SPDCL</b></td> <td><b>1149.18</b></td> <td><b>1172.56</b></td> <td><b>1397.50</b></td> <td><b>1397.50</b></td> <td><b>1397.50</b></td> </tr> <tr> <td><b>NPDCL</b></td> <td><b>3500.57</b></td> <td><b>3569.00</b></td> <td><b>4254.15</b></td> <td><b>4254.15</b></td> <td><b>4254.15</b></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> </table>  | <b>SPDCL</b>   | <b>1149.18</b> | <b>1172.56</b> | <b>1397.50</b> | <b>1397.50</b> | <b>1397.50</b> | <b>NPDCL</b> | <b>3500.57</b> | <b>3569.00</b> | <b>4254.15</b> | <b>4254.15</b> | <b>4254.15</b> | <b>Total</b> | <b>4650.55</b> | <b>4741.56</b> | <b>5651.65</b> | <b>5651.65</b> | <b>5651.65</b> | <p>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 regularly 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> |
| <b>SPDCL</b>  | <b>1149.18</b> | <b>1172.56</b> | <b>1397.50</b> | <b>1397.50</b> | <b>1397.50</b> |                |              |                |                |                |                |                |              |                |                |                |                |                |   |
| <b>NPDCL</b>  | <b>3500.57</b> | <b>3569.00</b> | <b>4254.15</b> | <b>4254.15</b> | <b>4254.15</b> |                |              |                |                |                |                |                |              |                |                |                |                |                |   |
| <b>Total</b>  | <b>4650.55</b> | <b>4741.56</b> | <b>5651.65</b> | <b>5651.65</b> | <b>5651.65</b> |                |              |                |                |                |                |                |              |                |                |                |                |                |   |
| <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 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> <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> |                |                 |         |         |         |         |         |         |         |         |         |         |         |         |              |                 |                |                |                 |   |
|--------------|--|--|----------------|-----------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|--------------|-----------------|----------------|----------------|-----------------|---|
| 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="403 828 1290 1039"> <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>1.SPDCL</td> <td>6354.87</td> <td>5604.01</td> <td>6296.97</td> <td>7007.86</td> </tr> <tr> <td>2.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 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</p> | Discom   | 2018-19        | 2019-20         | 2020-21 | 2021-22 | 1.SPDCL | 6354.87 | 5604.01 | 6296.97 | 7007.86 | 2.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><b><u>Response to queries 8 and 9 -</u></b></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> <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> <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</li> </ul> |
| Discom       | 2018-19  | 2019-20  | 2020-21        | 2021-22         |         |         |         |         |         |         |         |         |         |         |         |         |              |                 |                |                |                 |   |
| 1.SPDCL      | 6354.87  | 5604.01  | 6296.97        | 7007.86         |         |         |         |         |         |         |         |         |         |         |         |         |              |                 |                |                |                 |   |
| 2.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> |         |         |         |         |         |         |         |         |         |         |         |         |              |                 |                |                |                 |   |

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|   | <p>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> | <p>process.</p> <ul style="list-style-type: none"> <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> <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;</p> |
| 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</p>   |   |

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|    | <p>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 GoI and such non-submission affects credit ratings of the power utilities of the State Government for getting loans.</p>   | <p>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 regularly 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> |
| 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, 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,</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 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>  |



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|    | <p><b>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.</b></p>   |   |
| 11 | <p><b>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.</b></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 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><b>This is not for the first time that the TS Discoms are flouting directions and</b></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</p>  |

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.

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 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

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.

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.

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 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.

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 & 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.

**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.**

**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**

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|    | <p>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><b>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 authority to direct the Discoms to submit the same in time and issue orders after holding public hearings promptly.”</b></p> <p><b>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</b></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>TS Discoms shall abide by the instructions provided by the Hon’ble Commission.</p> |

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|    | <p>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> |   |
| 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 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>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> |
| 15 | <p>Secretary of TSERC, through the circular Lr. No. TSERC/Secy/F-</p>   | <p>This query falls under the purview of the Hon’ble Commission.</p>  |

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|    | <p>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 the years ARR and tariff proposals have not been filed as per applicable regulations.</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 elaborated in its response to query 11.</p>   |
| 16 | <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 HMWSSB shall also stand continue from 01.04.2021 till the TSDISCOMs file their regular proposals. The TSDISCOMs are directed to</i></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</p> |

*file the regular petition for determination of fresh retail supply tariffs, cross subsidy surcharge and additional surcharge for FY 2021-22 immediately.”*

**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.”**

**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 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.**

**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.**

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.

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 & 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 further instructions provided by the Hon’ble Commission.

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

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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 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:

- 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.
- 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

**Response to query 17 (a) -**

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.

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 & 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 further instructions provided by the Hon'ble Commission.



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.

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 Commission in its annual retail supply tariff orders. Irrespective of the period of true-up claims, these anomalies continue under the present arrangement.

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

**Response to query 17 (b) & (c) -**

TS Discoms shall abide by the instructions provided by the Hon'ble Commission

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.

**Response to query 17 (d), (e), (f), (g) & (h) -**

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.

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 & 2020-21. TS Discoms would be submitting all their RSB true up claims shortly to the Hon'ble Commission

TS Discoms view that this current situation where the burden of

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| <p>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>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</p> | <p>true-up due to power consumed by the consumers in preceeding 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 preceeding year.</p> <p>TS Discoms shall abide by the instructions provided by the Hon'be Commission.</p> |
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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.

- 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.
- j) The suggested procedure would ensure timely submission of claims by the Discoms for additional revenue in a financial year, without giving any scope for Government of the day to force them not to submit true-up claims in time, especially during pre-election period to hoodwink the people, leading to submission of such accumulated claims in the post-poll period, with the kind of difficulties both to the Discoms and their consumers of power that are being experienced repeatedly.
- k) Under the said suggested system, when the Hon'ble Commission works out cost of service to each category of consumers, showing the tariffs to be fixed to them accordingly, and asking the Government to convey its willingness to provide the subsidy it wants to provide to categories of

**Response to query 17 (i), (j), (k), (l) & (m) -**

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 committmented by the GoTS and cross subsidies across various consumer categories.

TS Discoms shall abide by the instructions provided by the Hon'ble Commission.

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|    | <p>consumers of its choice, the Government can take a decision as it deems fit. The Government may be constrained to provide adequate subsidy to avoid hefty hike in retail tariffs. Since it is for the Government to take a decision on providing subsidy, the people will judge the fairness or otherwise of its decision. In other words, the onus of decision rests with the Government, not with the Hon'ble Commission.</p> <p>l) The suggested system also avoids the dichotomy of applying different principles or parameters for working out cost of service to each category of consumers for determination of retail supply tariffs, on the one hand, and not applying the same under the present system of true-up claims, on the other. It further ensures provision for subsidy and cross subsidy also while determining tariffs for recovery of the entire permissible revenue claimed by the Discoms.</p> <p>m) It will also avoid need for repetitive public hearings that have been taking place under true-up claims, thereby saving the time and energy of the Hon'ble Commission and of those objectors who have 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> | <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> |
| 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</p>   | <p><b><u>Response to query 18, 19 -</u></b></p> <p>.</p>  |

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|    | <p>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>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 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</p> | <p>The comments are against the policies of GoI</p>   |

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| <p><b>Seema Kar/Terminal Tax of Rs 2 per tonne. In addition to these taxes, huge amounts are being transferred to the GoI 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 GoI 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.</b></p> <p><b>b) Under the guise of financial restructuring scheme earlier and UDAY later, GoI has been compelling the States to bear the burdens of accumulated losses and dues of loans of the Discoms. But GoI has not been providing any financial relief to the Discoms.</b></p> <p><b>c) In the name of encouraging renewable energy, GoI 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 GoI is not providing any financial assistance to the Discoms to lessen the burdens of RE.</b></p> <p><b>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,</b></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 GoI</p> <p>TS Discoms are purchasing the power from the short term market whenever the prices are reasonable, and providing continuous</p> |
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| <p>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, GoI 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 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</p> | <p>supply to the consumers.</p> <p>The comments are against the policies of GoI</p> <p>The comments are against the policies of GoI</p> <p>The comments are against the policies of GoI</p> |
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| <p><b>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 GoI 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 GoI. 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.</b></p> <p><b>h) As in the case of coal, in the case of natural gas also taxes being collected by the GoI and dividend from the central public sector utilities like ONGC, constitute a substantial part. But no relief is being provided by the GoI 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 GoI 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.</b></p> <p><b>i) GoI 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 purchase in the open market and exchanges where the price for power went up to Rs.15-20 per unit.</b></p> <p><b>j) As a part of its anti-people reforms, GoI 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</b></p> | <p>Govt. of Telangana, has been rigorously pursuing this matter with the Govt. of India.</p> <p>Govt. of Telangana, has ben rigorously pursuing this matter with the Govt. of India.</p> <p>TS Govt. has submitted its views on the EA amendment bill, to the GoI, opposing certain amendments.</p> |
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**excavated by the public sector coal companies, with necessary support and directions from the GoI, 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.**

- 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 GoI, the Modi Government continues to be intransigent,**
- 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 GoI 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 GoI even after six years. As a result, consumers of power in the State continue 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.**

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|    | <p>m) The amendments to EA being proposed by the GoI, 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 GoI. For the failures of commission and omission of the GoI, 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, GoI 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 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</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> |

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|    | <p>the stranded units are gas-based power generation units which are not functioning for lack of domestic gas supply. Under the PPAs, power <u>Discoms</u> 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, "<u>Coal pricing</u> needs to be regulated as in other sectors, since it is virtually a monopoly." It said the Centre should also consider subsidising railway <u>freight</u> 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 &amp; 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 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 | In his letter dated 5.12.2021, addressed to the Chief Ministers of Telangana   | TS Discoms understand that due to Telangana state being the first |

and Andhra Pradesh, Dr E A S Sarma garu, former secretary, Ministry of Power, GoI, 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.

“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 "*deemed generation clause*": 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 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.

“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

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).

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.

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|    | <p>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 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>  | <p>TS Govt. has been pursuing with the GoI, on the parameters adversely affecting the TS Discoms.</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</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</p> |

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| <p><b>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 and do not give specific requirement of additional power year-wise and major source-wise.</b></p> | <p>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 NCES, while evaluating the demand supply scenario of the state."</p> <p>The contracted capacity approved by the Hon'ble Commission in its transmission MYT order was predominately 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</p> |
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|    |  | 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.   |
| 25 | <p><b>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.</b></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.</p> |

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|    |  | <p>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><b>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, 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</b></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>TS Discoms would like to state that the assessment of agricultural consumption are 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</p> |



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|    | <p><b>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?</b></p>   | <p>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><b>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 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.</b></p> | <p>TS Discoms would like to state that the last tariff hike in the state was approved by the 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>   |
| 28 | <p><b>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</b></p>  | <p>The latest accumulated dues to be collected from different categories of consumers, especially from the departments of the Governments, both the Central &amp; State, and local bodies is as follows:</p>   |

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?

**Pending arrears from Govt. dept  
as on 31.12.2021**

| <b>Particulars</b>                 | <b>Amount<br/>(Rs.<br/>Cr.)</b> |
|------------------------------------|---------------------------------|
| LT Cat-I ( Domestic )              | 6.31                            |
| LT Cat-II ( Commercial )           | 1.23                            |
| LT Cat-III ( Industrial )          | 0.46                            |
| LT Cat-IV ( Cottage )              | -0.02                           |
| LT Cat-V ( Agriculture )           | 2.50                            |
| LT Cat-VI ( Street Lights<br>&WW ) | 3004.76                         |
| LT Cat-VII ( General<br>Purpose)   | 12.36                           |
| LT Cat-VIII ( Tem )                | 0.02                            |
| <b>LT TOTAL</b>                    | <b>3027.62</b>                  |
| HT Cat-I ( Industrial )            | 2518.66                         |
| HT Cat-II ( Non Industrial )       | 149.67                          |
| HT Cat-III                         | 3.29                            |
| HT Cat-IV ( Irrigation )           | 4270.82                         |
| HT Cat-V ( Railway Traction<br>)   | 3.36                            |
| HT Cat-VI ( Resid Colonies )       | 0.1                             |
| HT Cat-VII ( Tem )                 | 1.04                            |
| <b>HT TOTAL</b>                    | <b>6946.94</b>                  |
| <b>LT + HT TOTAL</b>               | <b>9974.56</b>                  |

Further, the said information is already available in the TS Discoms' annual reports, which are available in the Discom websites.

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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?

TS Discoms would like to clarify that the RPO computations have to be done on the Energy Input and not Energy sales.

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 & 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 –

| 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>     | <b>17.50%</b> | <b>19.00%</b> | <b>21.00%</b> |

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 State RPPOs may be directed to align with the MoP RPPO, in terms of National Tariff Policy. And particularly in view of the proposed

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|    |  | <p>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, GoI 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><b>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 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</b></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>Due to the significantly higher quantum of LIS sales projections in FY 2022-23 (~19% of total sales), TS Discoms requested the Hon'ble</p> |

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|    | <p><b>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.</b></p>  | <p>Commission for an exception in FY 2022-23, in this regard.</p>  |
| 31 | <p><b>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.</b></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 –<br/> <i>“Rates for such purchase for H2 FY 2021-22 and FY 2022-23, have</i></p> |

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|    |   | <p><i>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><b>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.</b></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><b>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 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</b></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>While determining the Capital cost or tariff of the project, the Hon’ble Commission will scrutiny the reasonableness of the capital</p>   |

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|    | <p><b>projects per MW in Crore Rupees are given below:</b></p> <p>a) Bhadradi TPS               Rs.7.90 cr<br/> b) Yadadri TPS               Rs.7.49 cr<br/> c) Kakatiya TPP stage I   Rs.5.92 cr<br/> d) KTPP stage II             Rs.7.233 cr<br/> e) KTPS stage VII           Rs.6.935 cr</p> <p><b>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.</b></p>  | <p>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><b>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:</b></p> <p>a) <b>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 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</b></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</p> |

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| <p>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) <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.</b></p> | <p>the rates in the both bids are not comparable. Tariff quoted in shorter period are slightly higher than tariffs committed for 25 years period. Considering TSGENCO Capacity additions, TSDISCOMs limited the PSA (570 MW) for eight years only. 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> <ol style="list-style-type: none"> <li>1. 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. As per the National Tariff Policy, “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.....” As per the provisions stated above, the PPA was entered with Chhattisgarh Power Distribution Company Ltd by TSDISCOMs. Moreover, the appropriate State Regulatory Commission determines the tariff for the project as mandated by the Electricity Act, 2003.</li> <li>2. CSERC has determined the tariff of Marwa vide order dated 07.07.2018, aggrieved by this order TSDISCOMs filed appeal</li> </ol> |
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| <p>c) <b>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 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.</b></p> <p>d) <b>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</b></p> | <p>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).</p> <p>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 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</p> |
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| <p><b>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.</b></p> <p><b>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.</b></p> <p><b>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 MoP notified pilot scheme for aggregation of 2500 MW for three years</b></p> | <p>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. 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. And as per the direction of TSERC on 02.02.2021, Supplementary Agreement was entered between NTPC and TSDISCOMs on. 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.</p> <p><u>Pilot Scheme-1</u><br/>In Pilot Scheme-I the tariff of Rs.4.24/Kwh (excluding Trading Margin of Rs.0.05/Kwh) and was discovered through Competitive</p> |
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|     | <p>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>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.</p> <p>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 &amp; Khariff seasons, whereas in Pilot Scheme-II minimum off-take is 85%, which is mandatory throughout the year continuously.</p> <p>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> <p>The Terms &amp; conditions of Pilot Scheme-I &amp; II are different and detailed below:</p> <table border="1" data-bbox="1411 764 2497 1182"> <thead> <tr> <th>SN.</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> | SN.   | 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). |
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| SN. | 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</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</p>  |   |           |         |          |   |                                   |                          |           |   |        |                   |   |

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|    | <p>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 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> | <p>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> |
| 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>   | <p>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>            |
| 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</p>   |  |

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|                                      | <p><b>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 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.</b></p> |  |
| 38                                   | <p><b>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.</b></p>  | <p>This is under the purview of the Hon'ble Commission.</p>  |
| <p><b>Additional Submissions</b></p> |  |  |
| 1                                    | <p><b>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</b></p>  | <p>The MOP order dated 09.11.2021, states the following -<br/> <i>"5. Distribution companies face revenue constraints as the corresponding</i></p> |

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|   | <p><b>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.</b></p> | <p><i>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><b>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</b></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:</p> <p><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></p> <ul style="list-style-type: none"> <li><i>(a) in case of a power plant –</i></li> <li><i>(i) not less than twenty six percent of the ownership is held by the</i></li> </ul>   |

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|    | <p>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><i>captive user(s), and</i><br/> <i>(ii) 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><br/> <i>(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."</i></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 levy of grid support charges is at the discretion of the Hon'ble Regulatory Commission.</p> |
| 3. | <p>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.</p>   | <p>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.</p>   |

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| 4 | <p><b>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.</b></p> | <p>Levy of fixed/demand charges in the consumer tariffs is allowed as per the state's tariff regulations. The relevant extract is mentioned below –</p> <p><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></p> <p>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.</p> <p>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>.</p> <p>By way of introducing fixed charges for LT Domestic, TS Discoms have tried to rationalize the tariff structure.</p> |
| 5 | <p><b>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.</b></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</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 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

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.

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. TS Discoms would abide by the instructions given by the Hon'ble Commission in this regard.

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|   | <p>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.</p> <p>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.</p> <p>Similarly, the Ministry of Power, government of India has allocated 50 MW of thermal Power to Telangana State with effect from 18.12.2021.</p> <p>Total 81 MW has been increased in the installed capacity for FY 2021-22.</p> |

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| 8  | <p>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>   | <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. As there is adequate power due to significant RE capacity addition to fulfill RPP0 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  | <p>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>  | <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. The threshold limit for 269.45 MW PPA is 85% and for 570 MW PPA is 90%. 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 | <p>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 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</p> | <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, GoI 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 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> </ul> |

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|    | <p>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>  | <ul style="list-style-type: none"> <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 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> | <p>During the release of new agriculture connections, TS Discoms are ensuring the energy efficient pumpsets. For the replacement of the existing pumps, it shall be done in a phased manner in coordination with the consumer.</p>  |

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| 12 | <p><b>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.</b></p> | <p>It is to inform that the outstanding arrears of the consumers over Rs. 50,000/- pending as on 30.09.2021 is Rs. 7086.14 crores (LT – Rs. 164.44 crs &amp; HT – Rs. 6921.70 crs (HT Govt. – Rs. 6171.44 crs &amp; HT Private – Rs. 750.26 crs)).</p> <p>Further, it is to inform that TSSPDCL has made a provision in the books of accounts for FY 2020-21 for an amount of Rs. 150.88 crores (as on 31.03.2021– Rs. 791.96 crs) towards provision for bad &amp; doubtful debts. However, no amount was written off as bad debts from any class or group of consumers. The provision for bad &amp; doubtful debts is being made for the C.C. charges dues payments against HT &amp; LT Bill stopped SCs (excluding court cases) for the above 2 years period.</p> <p>Further, it is to inform that, the disconnection of supply is not being implemented only in case of Government essential services like offices, water works, street lights, hospitals, etc. and there are no influential consumers in the Discom to whom supply is being extended without payment and without disconnection of supply as and when they become defaulters.</p> |

13

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.

The year wise No. of Accidents Occurred and Exgratia sanction particulars for Electrical Accidents from F.Y 2018-19 to F.Y 2020-21 are as follows:

| Year    | No. of Accidents Occurred |         |           |         | Exgratia paid cases |                 |             |                 | Total Amount in Lakhs |
|---------|---------------------------|---------|-----------|---------|---------------------|-----------------|-------------|-----------------|-----------------------|
|         | Fatal                     |         | Non-Fatal |         | Human               |                 | Animals     |                 |                       |
|         | Human                     | Animals | Human     | Animals | No.of cases         | Amount in Lakhs | No.of cases | Amount in Lakhs |                       |
| 2018-19 | 294                       | 754     | 21        | 0       | 230                 | 1014.00         | 546         | 170.00          | 1184.00               |
| 2019-20 | 258                       | 619     | 34        | 0       | 225                 | 1046.71         | 295         | 145.29          | 1192.00               |
| 2020-21 | 238                       | 517     | 53        | 0       | 178                 | 873.96          | 347         | 129.52          | 1003.48               |

The cause -wise year wise no of accidents occurred during FY20-21 is shown below.

**REASONS FOR ELECTRICAL ACCIDENTS FOR FY 2020-21**

| Sl.No. | REASONS   | HUMAN      |           | ANIMALS    |           | TOTAL      |           |
|--------|---|------------|-----------|------------|-----------|------------|-----------|
|        |   | FATAL      | NON-FATAL | FATAL      | NON-FATAL | FATAL      | NON-FATAL |
| (i)    | SNAPPING OF CONDUCTORS  | 16         | 9         | 194        | 0         | 210        |           |
| (ii)   | ACCIDENTAL CONTACT WITH LIVE ELECTRIC WIRE / EQUIPMENT          | 110        | 22        | 212        | 0         | 322        |           |
| (iii)  | VIOLATION / NEGLIGENCE OF SAFETY MEASURES / LACK OF SUPERVISION | 29         | 4         | 0          | 0         | 29         |           |
| (iv)   | DEFECTIVE APPLIANCES / APPARATUS / TOOLS                        | 53         | 5         | 104        | 0         | 157        |           |
| (v)    | INADEQUATE / LACK OF MAINTENANCE                                | 0          | 1         | 1          | 0         | 1          |           |
| (vi)   | UNAUTHORISED WORK   | 29         | 6         | 5          | 0         | 34         |           |
| (vii)  | ANY OTHER REASONS   | 1          | 6         | 1          | 0         | 2          |           |
|        | <b>TOTAL</b>  | <b>238</b> | <b>53</b> | <b>517</b> | <b>0</b>  | <b>755</b> |           |

It is observed that in most of the cases, it is the negligence of the victim and not department fault and in cases wherever department fault is there, action is initiated on the concerned officer and remedial measures are taken up to avoid electrical accidents .

It is to submit that the safety measures are already taken up to avoid

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|  |  | <p>electrical accidents which are as detailed below:</p> <ul style="list-style-type: none"><li>i) Yearly once, pre-monsoon inspections of lines are conducted with a program and the scheduled maintenance works are being carried out duly publishing in newspapers in advance, every month Second Saturday maintenance works at each substation are carried out.</li><li>ii) A detailed survey is being conducted for 33 KV, 11 KV and LT lines regularly to identify loose spans, leaned poles, rusted/damaged poles, in adequate clearances and the following rectification works are being carried promptly.<ul style="list-style-type: none"><li>a) Insertion of intermediate poles.</li><li>b) Replacement of damaged poles.</li><li>c) Replacement of damaged conductors.</li><li>d) Providing of spacers.</li><li>e) Restringing of loose spans.</li><li>f) Replacement of Disc's/Insulators.</li><li>g) Rectification of stays.</li><li>h) Replacement of damaged AB switches.</li></ul></li><li>iii) Survey of Distribution Transformer structures is being conducted regularly and rectification works are being executed on top priority as follows:</li></ul> |
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|  |  | <ul style="list-style-type: none"> <li>a) Arresting of leakages and refilling of Transformer oil.</li> <li>b) Rectification of defective AB switches.</li> <li>c) Rectification of earth pipes and earthing.</li> <li>d) Load balancing of DTRs.</li> <li>e) Correction of HG Fuse gaps.</li> <li>f) Replacement of LT bushing rods.</li> <li>g) Rectification of section fuses.</li> <li>h) Providing of fencing at vulnerable places.</li> <li>i) Raising of plinth</li> </ul> <p>In addition to the above, various rectification works as enclosed in the annexure were carried out under Palle Pragathi and Pattana Pragathi Schemes. Due to the above measures, the accidents are reducing from 330(2017-18) to 238(2020-21).</p> <ul style="list-style-type: none"> <li>iv) Strict instructions were issued to the field officers to adhere to the department standard procedure for earthing of Distribution Transformers.</li> </ul> <p>It is further submitted that there is a gradual reduction in <b>number</b> of deaths due to electrocution since we are keeping on conducting the awareness camps among the general public and also taking up diligent technical check up of lines etc., periodically to curb fatal &amp;</p> |
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|    |  | <p>Non-fatal accidents due to electrocution and we are also imparting training to all the field staff on the subject of safety measures.</p>   |
| 14 | <p><b>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. 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?</b></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.</p> <p>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</p> <p>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 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.</p> |

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|    |   | <p>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><b>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 sales 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 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.</b></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.</p> <p>Thus, TS Discoms have considered a past reference i.e. CAGR while projecting sales for LT Agriculture, however for HT LIS 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-</p> |

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|           |   | <p>wise consumption for FY2022-23. The objector may refer to the abovementioned information.</p>   |
| <p>16</p> | <p><b>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 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.</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 committmented 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.</p> |

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| 17 | <p><b>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.</b></p>   | TS Discoms make a note of this suggestion made by the objector.  |
| 18 | <p><b>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.</b></p> <p><b>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.</b></p> | TS Discoms make a note of this suggestion made by the objector, and will reply to the objections in a timely manner. |

**2. [Swamy Jaganmayananda](#) 4-96/2, Gandhi Chowk, Husnabad, Kodangal Mandal Vikarabad District, Telangana State — 509 350 Mob.No. 95507 60458**

| S.No. | Summary of Objections / Suggestions  | Response of the Licensee |                    |                              |    |     |     |       |    |        |                                       |    |     |     |    |  |  |    |        |    |    |     |     |       |    |        |    |    |     |     |  |   |          |   |   |   |   |   |   |    |   |   |   |   |   |   |    |  |
|-------|--|--------------------------|--------------------|------------------------------|----|-----|-----|-------|----|--------|---------------------------------------|----|-----|-----|----|--|--|----|--------|----|----|-----|-----|-------|----|--------|----|----|-----|-----|--|---|----------|---|---|---|---|---|---|----|---|---|---|---|---|---|----|--|
| 1     | <p>We thank the Government for providing Electricity on continuous basis. The Government is concentrating of providing the power continuously without looking into the aspects of avoiding power losses while transmission of the power from Genco to Transco, to Discom and sub-station to Bore wells. The transmission losses are heavy when the power is transmitted from Sub-station to Borewells. All the losses are factored into the account of AGL.</p> <p>Though the farmers are not made to pay for the losses, the losses are being incurred by the Government. The Government in turn making the losses good by way of increasing the power tariff or in other manner increasing taxes etc. Ultimately the loss is being borne by general public in one way or other. The only way to know where the power is lost and how much is lost is to fix the power meters at the distribution points from Sub-stations to AGL Borewells. Then take measures to contain the losses.</p> <p>Some of the suggestions are given hereunder for consideration of the Government:</p> <p>1) No proper Staff at Sub Division and Division level. For Example at Kodangal Sub division for three sections only one ADE and one AE is available to work. This need to be increased to JLM, LM, and CL for each village in each sub division and vacancies as given here under should be filled up</p> <table border="1" data-bbox="306 1208 1411 1395"> <thead> <tr> <th rowspan="2">Sl.No</th> <th rowspan="2">Name of the Mandal</th> <th colspan="7">No of Staff Post as per 2006</th> <th colspan="7">No of staff existing as on 29.10.2021</th> </tr> <tr> <th>AE</th> <th>Sub Er</th> <th>LI</th> <th>LM</th> <th>ALM</th> <th>JLM</th> <th>Total</th> <th>AE</th> <th>Sub Er</th> <th>LI</th> <th>LM</th> <th>ALM</th> <th>JLM</th> <th></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Kodangal</td> <td>1</td> <td>1</td> <td>2</td> <td>5</td> <td>6</td> <td>9</td> <td>22</td> <td>0</td> <td>1</td> <td>0</td> <td>3</td> <td>0</td> <td>9</td> <td>12</td> </tr> </tbody> </table> | Sl.No                    | Name of the Mandal | No of Staff Post as per 2006 |    |     |     |       |    |        | No of staff existing as on 29.10.2021 |    |     |     |    |  |  | AE | Sub Er | LI | LM | ALM | JLM | Total | AE | Sub Er | LI | LM | ALM | JLM |  | 1 | Kodangal | 1 | 1 | 2 | 5 | 6 | 9 | 22 | 0 | 1 | 0 | 3 | 0 | 9 | 12 | <p>TS Discoms are participating in various central and state level schemes intended to reduce the AT&amp;C losses. TS Discoms are participating in PM KUSUM scheme component A which facilitates Renewable generation at 11 kV level thus reduces transmission losses. TS Discoms are in the process of participating in Revamped Distribution Sector Scheme for a financial turnaround. This would help in further improving the overall financial condition of the Discoms, by reduction in the AT&amp;C loss levels and ACS-ARR gap. As part of RDS scheme, TS Discoms are proposing the bifurcation of the mixed agriculture feeders to exclusive agriculture feeders, to measure the the energy consumed by the agriculture pumps on the existing feeders.</p> <p>TS Discoms are committed to provide 24/7 free power to agriculture consumers, in line with the Govt. of Telangana directives.</p> <p>TS Discoms shall abide by the directions given by the Hon'ble Commission, and the Govt. of Telangana</p> <p>There are only few vacant posts totaling to 8 Nos. in the Kodangal, Bomarspet and Doulthabad Sections and further, there is no disruption of works. These vacancies will also be filled up from time to time by way of transfers and promotions.</p> |
| Sl.No | Name of the Mandal   |                          |                    | No of Staff Post as per 2006 |    |     |     |       |    |        | No of staff existing as on 29.10.2021 |    |     |     |    |  |  |    |        |    |    |     |     |       |    |        |    |    |     |     |  |   |          |   |   |   |   |   |   |    |   |   |   |   |   |   |    |  |
|       |  | AE                       | Sub Er             | LI                           | LM | ALM | JLM | Total | AE | Sub Er | LI                                    | LM | ALM | JLM |    |  |  |    |        |    |    |     |     |       |    |        |    |    |     |     |  |   |          |   |   |   |   |   |   |    |   |   |   |   |   |   |    |  |
| 1     | Kodangal   | 1                        | 1                  | 2                            | 5  | 6   | 9   | 22    | 0  | 1      | 0                                     | 3  | 0   | 9   | 12 |  |  |    |        |    |    |     |     |       |    |        |    |    |     |     |  |   |          |   |   |   |   |   |   |    |   |   |   |   |   |   |    |  |

|       |           |   |   |   |    |    |    |    |             |   |   |   |   |    |    |
|-------|-----------|---|---|---|----|----|----|----|-------------|---|---|---|---|----|----|
| 2     | Bomraspe  | 1 | 1 | 2 | 5  | 4  | 13 | 24 | 1(on Leave) | 0 | 2 | 3 | 0 | 10 | 15 |
| 3     | Doultabad | 1 | 1 | 1 | 3  | 3  | 7  | 14 | 1           | 0 | 0 | 0 | 0 | 9  | 9  |
| Total |           | 3 | 3 | 5 | 13 | 13 | 29 | 60 | 2           | 1 | 2 | 6 | 0 | 28 | 36 |

| Sr.NO. | Name of Mandal | No of Staff Vaccancies |        |    |    |     |     |       |
|--------|----------------|------------------------|--------|----|----|-----|-----|-------|
|        |                | AE                     | Sub Er | LI | LM | ALM | JLM | Total |
| 1      | Kodangal       | 1                      | 0      | 2  | 2  | 6   | 0   | 10    |
| 2      | Bomraspe       | 0                      | 1      | 0  | 2  | 4   | 3   | 9     |
| 3      | Doultabad      | 0                      | 1      | 1  | 3  | 3   | -2  | 5     |
| Total  |                | 1                      | 2      | 3  | 7  | 13  | 1   | 24    |

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| 2 | <b>Our request for separate lines for AGL transformers and Domestic Transformers from Sub-stations is not completed till date. Its more than one year since we gave a representation in this regard. It should be completed at the earliest to avoid inconvenient to the villages</b>   | Discom is in the process of preparing a scheme for separating Agl feeders.   |
| 3 | <b>A substation was sanctioned for Husnabad Village 5 years back, but no work has done on that till date</b>  | Due to Right of Way issue, the substation works could not be started.  |
| 4 | <b>We have to complain every time to the Director for small and big issue then only the works are being done. No officer at the circle, Division, and Sub-division level are responding to our request for solving the problems. Hence, clear instruction should be given to them for attending the problems at their concerned level so that we need not approach you for all and sundry issues from</b> | The consumers can lodge complaints at the customer service centres/ICSC centres that are present in the sub-division level |

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|   | <b>time to time</b>  |  |
| 5 | <b>It is observed many a times that the ADE, AE, DE are closing the work books indicting that the contractor has completed the works and contract amount is being released to them. The contractors are not given the complete material for completion of the work. Since the works are not completed as per the estimated work due not providing sufficient material the contractor would complete based on the material given to him</b>   | Enquiry will be conducted on any specific complaint if received on cases where work orders are closed without completion of works and suitable action will be taken.   |
| 6 | <p><b>There is problem in stores management. When there is a transformer in the stores there will not be AB Switch and when there is Conductor there will not machining material etc. This leads to delay in erection of DTR and giving rise to other problems. Therefore, it is suggested that:</b></p> <p><b>a. The entire Stores Management systems has to be computerized. b. All the people concerned — ADE, DE and other related officers should be able access the information about the material available in the stores so that the needy officers will be able to indent for their required material from their Section/Sub-Division only without visiting the stores office. c. The Stores incharge should be able to supply the indented material to the needy office/Section/ Sub-Division. d. On receipt of the material, the office/Section/Sub-Division should be submitting utilization certificate etc of the material to the Stores for accounting purpose.</b></p> <p><b>The above computerization if implemented will bring transparency in the stores management and check any possible corruption in this area which is now happening</b></p> | The entire store management system in TSSPDCL is computerized through SAP(HANA) system and all the field officers have access of the information about the availability of the material and also regarding incoming supplies of the materials in the stores. |
| 7 | <b>Each District should be having Stores for supply of material. There are no stores</b>   | All the major districts in TSSPDCL have established district stores and new stores are also being established wherever required.   |



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|    | <b>for all the new districts</b>  |  |
| 8  | <b>The facility for uploading a photograph of the Transformer / transmission line etc., which is / are not working with longitude and latitude positions in the TSSPDCL APP should be provided so that the concerned officials will be able act upon that immediately and resolve the issue</b>   | The mentioned facility is working properly. In case of difficulties/discrepancies, the same shall be reported at concerned sub-division.   |
| 9  | <b>When a Consumer submits a DD for a DTR sanction the Consumer APP should show the estimation for the DTR work required. Eg. 11 kv line per km amount, LT line km total amount DTR capacity, kva total amount. Grand total amount. This will avoid harassments by the Department in getting the estimation and making payment and also avoids scope for corruption</b> | Suggestion is noted.   |
| 10 | <b>Please inspect the works which are done in past on fencing in Pargi sub division</b>   | Enquiry has been conducted by a committee and vigilance team on fencing works executed in Vikarabad circle   |
| 11 | <b>We have also asked the information about AB Switch &amp; SG Set through an RTI letter to the Corporation PRO. But we didn't get the proper information to us.</b>  | The information is submitted in accordance with RTI Act, 2005 vide Lr.No.SE/OP/RRS/Tech/F.RTI/D.No.1730/16-17, Dt:17.02.2017.  |
| 12 | <b>Provide on Van for each Transformer Repair Centre so that the transformers are easily transported to the centre and repair and back erection. Absence of this causing lot of hardship to the farmers and they have to incur lot expenses for transportation of the DTR</b>   | Transportation of failed DTR's is done at the cost of DISCOMS. In rural circles, a utility Van is provided for each sub division which is used for transportation of failed DTR's & healthy DTR's.       |
| 13 | <b>Please look into the works of Palle Pragathi and Pattana Pragathi works done so far. Specifically, in agriculture no work has been done so far till date</b>   | Palle Pragathi and Pattana Pragathi works are prestigious programmes initiated by the State Government and the works already were taken up especially in TOWNS, Municipalities and Village distributions |

3. [Sarampalli MallaReddy](#), Akila Bharat Kishan Sabha, H.NO. 1-1-60/2, RTC X Road, Musheerabad, Hyderabad-20, Ph.No. 9490098666

| S.No.         | Summary of Objections / Suggestions  | Response of the Licensee |                  |               |      |        |         |          |          |       |          |          |          |               |                  |                 |                 |  |
|---------------|--|--------------------------|------------------|---------------|------|--------|---------|----------|----------|-------|----------|----------|----------|---------------|------------------|-----------------|-----------------|--|
| 1             | <p>టారిఫ్ పెంచడం :</p> <p>యాన్యుల్ రెవెన్యూ రిక్వైర్మెంట్కు సంబంధించి వినియోగదారులపై రూ. 6,830. 90 కోట్లు భారాలు వేయడమేగాక లోటు రూ.4,097.28 కోట్లు చూపారు. రాష్ట్ర ప్రభుత్వం రూ. 5,651.65 కోట్లు సబ్సిడీ ఇచ్చినప్పటికీ లోటును చూపడం, ఆ లోటును ఎలా భర్తీ చేస్తారో చెప్పలేదు. (కోట్లలో)</p> <table border="1" data-bbox="303 730 1400 1104"> <thead> <tr> <th>డిస్కాంలు.</th> <th>ప్రభుత్వ సబ్సిడీ</th> <th>టారిఫ్ పెంచడం</th> <th>లోటు</th> </tr> </thead> <tbody> <tr> <td>దక్షిణ</td> <td>4254.15</td> <td>5,044.27</td> <td>2,686.79</td> </tr> <tr> <td>ఉత్తర</td> <td>1,897.50</td> <td>1,786.63</td> <td>1,410.44</td> </tr> <tr> <td><b>మొత్తం</b></td> <td><b>5, 651. 6</b></td> <td><b>6,880.90</b></td> <td><b>4,097.28</b></td> </tr> </tbody> </table> <p>ఈ లోటును భర్తీ చేయడానికి ఎలాంటి టారిఫ్ పెంచడంగానీ, అంతర్గత సామర్థ్యం పెంచుకోవడం ద్వారా గానీ పూర్తి చేసుకునేటట్లు ఎలాంటి ప్రతిపాదన డిస్కాంలు చేయలేదు. అనగా ఈ లోటును కొంత కాలం తరువాత మళ్ళీ</p> | డిస్కాంలు.               | ప్రభుత్వ సబ్సిడీ | టారిఫ్ పెంచడం | లోటు | దక్షిణ | 4254.15 | 5,044.27 | 2,686.79 | ఉత్తర | 1,897.50 | 1,786.63 | 1,410.44 | <b>మొత్తం</b> | <b>5, 651. 6</b> | <b>6,880.90</b> | <b>4,097.28</b> | <p>టారిఫ్ పెంపు ప్రతిపాదనలు మరియు అంతర్గత సామర్థ్యం తో ఆర్థిక లోటు ని భర్తీ చేస్తామని వార్షిక ప్రతిపాదనల నివేదికలో అదనపు సమాచారంలో కూడా పొందు పరిచాము.</p> |
| డిస్కాంలు.    | ప్రభుత్వ సబ్సిడీ   | టారిఫ్ పెంచడం            | లోటు             |               |      |        |         |          |          |       |          |          |          |               |                  |                 |                 |  |
| దక్షిణ        | 4254.15  | 5,044.27                 | 2,686.79         |               |      |        |         |          |          |       |          |          |          |               |                  |                 |                 |  |
| ఉత్తర         | 1,897.50   | 1,786.63                 | 1,410.44         |               |      |        |         |          |          |       |          |          |          |               |                  |                 |                 |  |
| <b>మొత్తం</b> | <b>5, 651. 6</b>   | <b>6,880.90</b>          | <b>4,097.28</b>  |               |      |        |         |          |          |       |          |          |          |               |                  |                 |                 |  |

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|----------|---|---------|-----------|----------|----------|---------|-----------|---------|------------|--|
|          | వినియోగదారులపై వేసే అవకాశం ఉంది.  |         |           |          |          |         |           |         |            |  |
| 2        | <p>2018-19 నుండి 2021-22 వరకు లోటును ఎలా భర్తీ చేస్తారు. గత 4 సంవత్సరాలుగా డిస్కాంలు రెగ్యులేటరీ కమీషన్ కు ఎలాంటి టారిఫ్ ప్రపోజల్స్ ఇవ్వలేదు. ఆ సంవత్సరాలలో వచ్చిన లోటును విడిగా చూపారు. ఆ లోటును ఎలా భర్తీ చేస్తారో, ఎలాంటి ప్రతిపాదన చేయలేదు. టారిఫ్ లను చట్ట ప్రకారం నవంబర్ లో కమీషన్ కు డిస్కాంలు ప్రతిపాదించాలి. ఫిబ్రవరిలో బహిరంగ విచారణ జరిపి కమీషన్ టారిఫ్ లు నిర్ణయించాలి. ప్రభుత్వ ఒత్తిడి ద్వారా గత 4 సంవత్సరాలుగా ఏఆర్ఆర్ లు ఇవ్వకపోవడం చట్టాన్ని దిక్కరించినట్టు అయ్యింది. దీనికి బాధ్యులు ఎవరు? రెగ్యులేటరీ కమీషన్ డిస్కాంలపై ఎలాంటి చర్యలు తీసుకుంది. గత &amp; సంవత్సరాలలోటు ఈ విధంగా ఉంది. (కోట్లలో)</p> <table border="1"> <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> </table> | 2018-19 | 10,232.74 | 2019- 20 | 7,317.29 | 2020-21 | 8,666. 76 | 2021-22 | 10,624. 84 | <p>గత సంవత్సరాల లోటుని భర్తీ చేయడానికి విద్యుత్ కొనుగోలు ట్రూ అప్స్ ను ఈ ఆర్ సివారికి సమర్పిస్తాము</p> |
| 2018-19  | 10,232.74   |         |           |          |          |         |           |         |            |  |
| 2019- 20 | 7,317.29  |         |           |          |          |         |           |         |            |  |
| 2020-21  | 8,666. 76   |         |           |          |          |         |           |         |            |  |
| 2021-22  | 10,624. 84  |         |           |          |          |         |           |         |            |  |

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|   | <p><b>మొత్తం 36,841.63</b></p> <p>ఇంత లోటును డిస్కాంలు పూరించడానికి ఎలాంటి ప్రతిపాదనలు చేయకపోవడం ఆశ్చర్యకరం. ఇది</p> <p>కాకుండా 2022-28 సంవత్సరానికి కూడా లోటు 4,097,238 కోట్లు కూడా చూపారు. డిస్కాంలు ఇంతలోటుతో ఎలా పని చేస్తున్నాయి. ఈ భారాలన్ని వినియోగదారులపై ఒకేసారి వేస్తే పరిస్థితి ఎలా ఉంటుందో ఊహించగలమా?</p>  |   |
| 3 | <p><b>డిస్కాంల చట్ట ఉల్లంఘన :-</b></p> <p>సకాలంలో ఎఆర్ఆర్లు వేయకపోగా, కనీసం లోటును భర్తి చేయడానికి కూడా ప్రతిపాదనలు చేయకపోవడం వినియోగదారులను భ్రమలకు గురి చేయడం లేదా మోసగించడానికి ప్రయత్నించడమే తప్ప మరొకటి కాదు. ఉదయ్ పథకం అమలు తీరును కూడా ప్రస్తావించలేదు. దీనిపై ప్రభుత్వ ఒత్తిడి ఎమిటి ? విద్యుత్ శాఖ మంత్రి ఏమి చేస్తున్నాడు ? ఎఆర్ఆర్లను ఎన్నికలకు ముడిపెట్టి వాయిదా వేశారా ? విద్యుత్ చట్టం ఎందుకు అమలు జరగడం లేదు ? 4 సంవత్సరాల తరువాత ఇప్పుడు ఎఆర్ఆర్ రెగ్యులేటరీ కమీషన్ కు ఇవ్వాలి</p> | <ul style="list-style-type: none"> <li>● తెలంగాణ అసెంబ్లీ మరియు లోక్ సభ ఎన్నికల దృష్ట్యా రాష్ట్రంలో మోడల్ కోడ్ ఆఫ్ కండక్ట్ అమలు.</li> <li>● గౌరవనీయమైన TSERC చైర్మన్ పదవి కాలం ముగియడం వలన, 9 జనవరి 2019 నుండి ERC కార్యచరణ లేదు.</li> <li>● మహమ్మారి COVID-19 వ్యాప్తి కారణంగా GoTS ద్వారా రాష్ట్రంలో లాక్ డౌన్ విధించడం జరిగింది.</li> </ul> <p>ఈ పైన తెలిపిన నియంత్రించలేని కారణాల వలన డిస్కామ్ వారు ఏ ఆర్ ఆర్</p> |

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|   | అవసరం ఏమి వచ్చింది?  | లను ఆలస్యంగా సమర్పించడం జరిగింది.  |
| 4 | <p><b>టారిఫ్ రేట్ల పెంపుదల :-</b></p> <p>డోమిస్టిక్ ఎల్టి 1 క్యాటగిరికి రూ. 1.45 పైసల నుండి రూ. 1.95కు పెంచారు. పెంపుదల 30 శాతం పైనా ఉంది. 2వ క్యాటగిరి రూ.2. 60 నుండి రూ.8.10 రూపాయలకు పెంచారు. ఇది 18 శాతానికే పరిమితం అయ్యింది. అన్ని ఎల్టి క్యాటగిరిలకు 50 పైసలు, హెచ్టి క్యాటగిరిలకు 1 రూపాయి చొప్పున గుండు గుతాగా పెంచారు. డోమిస్టిక్ ఎల్టి 1కు పడిన భారం మిగిలిన వాటికి నిర్ణయించలేదు. శాస్త్రీయంగా టారిఫ్ రేట్ల పెంపుదల నిర్ణయం జరగలేదు. ఎక్కువ విద్యుత్ వినియోగించే వారికి పెరుగుదల నామమాత్రంగా ఉంది. ఈ భారత వల్ల చాలా మంది విద్యుత్ వినియోగానికి దూరమయ్యే అవకాశం ఉంది.</p> | <p>జాతీయ టారిఫ్ పాలసీకి అనుగుణంగా తక్కువ స్లాబ్ టారిఫ్లకు ఎక్కువ గా మరియు ఎక్కువ స్లాబ్ టారిఫ్లకు తక్కువ గా పెంపు ప్రతిపాదనలు సమర్పించడం జరిగింది.</p>   |
| 5 | <p><b>మిగులు విద్యుత్ :-</b></p> <p>డిస్కాంలకు 20,537.95 మెగవాట్ల విద్యుత్ అవసరమని తేలింది. కానీ డిస్కాంలు 25,760 మెగవాట్లు అవసరమని చెప్పారు. 76 శాతం పిఎల్ఎఫ్ లెక్కించి మిగులు విద్యుత్ ఉంటున్నది. అవసరానికి మించిన విద్యుత్ను</p>  | <p>TSDISCOMలు 20560 MW యొక్క మొత్తం ఇన్స్టాల్/కాంట్రాక్ట్ కెపాసిటీని చూపించాయి, అందులో 24.51 MW (APGPCL) అందుబాటులో లేదు, 2400 MW హైడ్రల్ పవర్లో అనిశ్చితి ఉంటుంది, 5600 MW RE పవర్ 20 - 30 % plf వద్ద మాత్రమే అందుబాటులో ఉంటుంది మరియు బ్యాలెన్స్ కెపాసిటీ లభ్యత అనేది ప్లాంట్ల ఆకస్మిక</p> |

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| <p>కేటాయించడం అవసరమా ? కాంట్రాక్ట్ కుదుర్చుకున్నప్పుడు “ఫిక్స్డ్ ఛార్జీల” భారం వినియోగ దారులపై పడుతుంది. ఇది అవసరమా ? గత సంవత్సరం 16, 603 మెగావాట్ల వినియోగించాం. ఒకేసారి 9,150 మెగావాట్లు పెంచుకోవడం వల్ల ఉపయోగం ఏమిటి ?</p> | <p>అంతరాయాలు, ట్రాన్స్మిషన్ సమస్యలు, బొగ్గు అనుసంధానం మొదలైన వివిధ అంశాలపై ఆధారపడి ఉంటుంది.</p> <p>FY 2022-23 కోసం సామర్థ్య జోడింపులో దాదాపు 2000 మెగావాట్ల RE పవర్ మరియు కొత్త ప్రాజెక్ట్ల నుండి దాదాపు 2000 MW థర్మల్ పవర్ ఉన్నాయి, దీని CoDలు వేర్వేరు నెలల్లో అంచనా వేయబడతాయి. 2022-23 ఆర్థిక సంవత్సరానికి అంచనా వేసినట్లుగా పెరిగిన డిమాండ్ను చేరుకోవడానికి ఈ సామర్థ్య జోడింపు అవసరం.</p> <p>అంతేకాకుండా, వ్యయ భారాన్ని తగ్గించడానికి ప్రతి చర్యను తీసుకుంటూ అత్యంత ప్రభావవంతమైన మార్గంలో అంచనా వేసిన డిమాండ్ను తీర్చడానికి పవర్ ప్లానింగ్ తయారు చేయబడుతుంది. TSDISCOMలు అన్ని వర్గాల వినియోగదారులకు అంతరాయం లేని విద్యుత్ సరఫరాను నిర్ధారించడానికి బాధ్యత వహిస్తాయి. పవర్ ప్లానింగ్ చేసేటప్పుడు ఫిక్స్డ్ ఛార్జీ మాత్రమే ప్రమాణం కాదు.</p> <p>తెలంగాణ రాష్ట్రంలోని అన్ని వర్గాల వినియోగదారులకు 24 గంటల విద్యుత్ సరఫరా కోసం, మరియు ప్రస్తుత 6000 మెగావాట్లు లిఫ్ట్ ఇరిగేషన్ లోడుకు అదనంగా కాళేశ్వరం, పామూరు రంగారెడ్డి, సీతారాం ప్రాజెక్టులు (సుమారు 8000 మెగావాట్లు) అదనపు సామర్థ్యం అవసరం. అంతే కాకుండా వ్యవసాయ పంపుసెట్ల 2014 సంవత్సరంలో 19.03 లక్షలు నుండి 01.06.2021 వరకు 25.37 లక్షలకు పెరిగినవి మరియు కొన్ని PPAల గడువు వచ్చే మూడేళ్లలో ముగుస్తుంది.</p> |
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| 6 | <p><b>డిఎస్యం అమలులో డిస్కాంల నిర్లక్ష్యం :-</b> డిమాండ్ సైడ్ మెనేజ్మెంట్ విధానం రూపొందించి 2 దశాబాలు గడుస్తున్నాయి. కానీ డిస్కాంలు పంపుసెట్లకు కెపాసిటర్లు బిగించడంలో, కొత్త కనక్షన్లు పొందిన రైతులకు పోల్స్, కండక్టర్ ఇవ్వకపోవడం వల్ల సర్వీసు వైర్లపై మోటార్లు నడుస్తున్నాయి. ఇది డిఎస్యం విధానానికి విరుద్ధం. వాస్తవ వినియోగం అంచనా వేయుట :- నష్టాలను భర్తీ చేయటానికి మీటర్లు లేకుండా పంఫిణీ చేస్తున్న వ్యవసాయరంగంపై అధనపు వినియోగాన్ని చూపి నష్టాలను తక్కువ చూపుతున్నారు. వాస్తవ వినియోగ అంచనా వేయడానికి ట్రాన్స్ఫార్మర్ వద్ద వ్యవసాయ పీడర్కు మీటరు పెట్టి వినియోగాన్ని సేకరించవచ్చు. కానీ ఆ పని చేయకుండా ఇప్పటికీ నష్టాలు 10-11 శాతం ఉంటున్నట్లు డిస్కాంలు చెప్పడం జరిగింది. ఈ నష్టాన్ని తగ్గించుకోవడానికి గతంలో 30 వేల కోట్లు ప్రభుత్వం మంజూరీ చేసి రిపేర్లు చేశారు. అయినా నష్టాలు పెరుగుతూనే ఉన్నాయి. నష్టాలు తగ్గించడం సాధ్యం కాదా ?</p> | <p>గౌరవనీయ కమిషన్ వారు ఆమోదించిన ISI విధానం ద్వారానే వ్యవసాయ వినియోగాన్ని లెక్కించడం జరుగుతుంది. డిస్కామ్ వారి నష్టాలూ ప్రతి సంవత్సరం తగ్గుతున్నవి మరియు జాతీయ సగటు కంటే కూడా తక్కువగా ఉన్నాయని తెలియజేస్తున్నాం.</p> |
| 7 | <p><b>విద్యుత్ ప్రమాదంలో మరణించిన వారికి పరిహారాలు చెల్లించుట :-</b></p>   | <p>F.Y 2014-15 నుండి F.Y 2021-22 మొదటి సగం వరకు (సెప్టెంబర్ 21 వరకు) విద్యుత్ ప్రమాదాల కోసం సంవత్సరాల వారీగా మంజూరైన ఎక్స్గ్రేషియా వివరాలు క్రింది విధంగా</p>   |

విద్యుత్ శాఖ లోపాలవలన మరణించిన వారికి, మరణించిన పశువులకు పూర్తిస్థాయిలో పరిహారం ఇవ్వడం లేదు. పెండింగ్లో లేదా తమ లోపం కాదని త్రోసిపుచ్చడం జరుగుతున్నది. దీనిపై ఎలాంటి న్యాయ విచారణ జరగడంలేదు. గౌరవ రెగ్యులేటరీ కమిషన్ ఈ ప్రమాదాలపై ప్రత్యేకంగా ఒక కమిషన్ ద్వారా సర్వే చేయించాలని కోరుతున్నాము

ఉన్నాయి:

| సం  రం  | ప్రమాదం సంభవించిన వారి సంఖ్య |         |         |         | ఎక్స్ గ్రేషియా చెల్లించిన కేసుల వివరాలు |                   |         |                   | మొత్తం  |
|---------|------------------------------|---------|---------|---------|---|-------------------|---------|-------------------|---------|
|         | మరణించిన                     |         | గాయపడిన |         | మనుషులు                                 |                   | పశువులు |                   |         |
|         | మనుషులు                      | పశువులు | మనుషులు | పశువులు | సంఖ్య                                   | మొత్తం రూ/లక్షలలో | సంఖ్య   | మొత్తం రూ/లక్షలలో |         |
| 2014-15 | 253                          | 65      | 28      | 0       | 116                                     | 210.50            | 40      | 3.78              | 214.28  |
| 2015-16 | 355                          | 193     | 32      | 0       | 198                                     | 557.00            | 199     | 43.45             | 600.45  |
| 2016-17 | 296                          | 380     | 43      | 0       | 180                                     | 763.00            | 426     | 161.20            | 924.20  |
| 2017-18 | 332                          | 538     | 40      | 0       | 296                                     | 1213.00           | 458     | 168.00            | 1381.00 |
| 2018-19 | 294                          | 754     | 21      | 0       | 230                                     | 1014.00           | 546     | 170.00            | 1184.00 |
| 2019-20 | 258                          | 619     | 34      | 0       | 225                                     | 1046.71           | 295     | 145.29            | 1192.00 |
| 2020-21 | 238                          | 517     | 53      | 0       | 178                                     | 873.63            | 347     | 129.52            | 1003.48 |
| 2021-22 | 76                           | 206     | 21      | 0       | 133                                     | 655.00            | 162     | 60.42             | 715.42  |

ప్రాణాంతకమైన ప్రమాదాలు సంభవించినప్పుడు, అవసరమైన పత్రాలు (మరణ ధృవీకరణ పత్రం, చట్టబద్ధమైన వారసుల ధృవీకరణ పత్రం, పోలీసుల ఎఫ్ఐఆర్, పోలీసుల ద్వారా పంచనామా, పోస్ట్ మార్టం నివేదిక మొదలైనవి వంటివి) సమర్పించిన వెంటనే ఎలాంటి ఆలస్యం లేకుండా మరణించిన వారి చట్టపరమైన వారసులకు ఎక్స్ గ్రేషియా చెల్లించడం జరుగుతుంది.) సమర్పించబడతాయి.

అంతే కాకుండా నష్టపరిహారం కోసం కోర్టు కేసులు వేయగా, తీర్పులు వచ్చిన వెంటనే కోర్టు ఆదేశాల మేరకు పరిహారం అందజేసేందుకు ఏర్పాట్లు చేయడం జరుగుతుంది.



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| 8 | <p><b>డిస్కాంల నిర్లక్ష్యం వలన ట్రాన్స్ఫార్మర్లు కాలిపోవడం, పంపుసెట్లు కాలిపోవడం :-</b></p> <p>సబ్-స్టేషన్లలో ఉండాల్సిన 6గురు సిబ్బందికి తక్కువగా ఉన్నారు. లైన్మెన్ పోస్టులు చాలాకాలంగా ఖాళీగా ఉంటున్నాయి. అయినప్పటికీ డిస్కాంలు వారికి వేతనాలు ఇస్తున్నట్లు టారిఫ్ పెంపుదల చేసి వినియోగదారులపై భారాలు వేస్తున్నారు. నిర్దిష్ట నియమాకం ప్రకారం సిబ్బందిని నియమించాలని డిస్కాంలను ఆదేశించగలరు. ట్రాన్స్ఫార్మర్లకు ఎబి స్విచ్లు ఉండవు. ట్రాన్స్ఫార్మర్ చుట్టూ గడ్డీ, గాదం పెరిగి ఉంటుంది. ఎర్టింగ్ ఉండదు. వీటి ఫలితంగా ట్రాన్స్ఫార్మర్లు కాలిపోవడం వాటి ఫలితంగా పంపుసెట్లు కాలిపోతున్నాయి. వేల రూపాయల వ్యయం చేసి తిరిగి పంపుసెట్లు బాగుచేయించుకోవడం చేతకాక పంటనే వదిలి వేస్తున్నారు. విద్యుత్ సరఫరా వైఫల్యం వలన జరుగు పంట నష్టాలకు డిస్కాంలనే బాధ్యులను చేయాలి.</p> | <p>డిస్కామ్ వారు డిటిఆర్ల యొక్క కాలానుగుణ నిర్వహణ క్రమం తప్పకుండా చేపట్టబడుతోంది మరియు కింది విధంగా సరిదిద్దే పనులు అగ్ర ప్రాధాన్యతపై అమలు చేయబడుతున్నాయి:</p> <p>ఎ) లీకేజీలను అరికట్టడం మరియు ట్రాన్స్ఫార్మర్ ఆయిల్ను రీఫిల్ చేయడం.<br/> బి) లోపభూయిష్ట AB స్విచ్ల సరిదిద్దడం.<br/> సి) ఎర్ట్ వైపులు మరియు ఎర్టింగ్ యొక్క సరిదిద్దడం.<br/> డి) DTRల లోడ్ బ్యాలెన్సింగ్.<br/> ఇ) HG ఫ్యూజ్ ఖాళీల సరిదిద్దడం.<br/> ఫి) LT బుషింగ్ రాడ్ల భర్తీ.<br/> గి) సెక్షన్ ఫ్యూజుల సరిదిద్దడం.<br/> హి) హాని కలిగించే ప్రదేశాలలో ఫెన్సింగ్ అందించడం.<br/> ఐ) పునాదిని పెంచడం.</p> <p>01.04.2021 నుండి 31.01.2022 వరకు డిటిఆర్ ఎర్టింగ్ యొక్క పునరుద్ధరణ కోసం రూ.3.8 కోట్లు మరియు లోపభూయిష్ట AB స్విచ్ల భర్తీకి రూ.11.4 కోట్ల బడ్జెట్ కేటాయించబడింది.</p> <p>అలాగే, మునుపటి సంవత్సరంతో పోలిస్తే DTR వైఫల్యాలు కూడా తగ్గాయి<br/> { DTR వైఫల్యాలు: FY2020-21(ఏప్రిల్-డిసెంబర్'20)లో 32,316సంఖ్యలు మరియు</p> |
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|    |   | DTR వైఫల్యాలు: FY2021-22(ఏప్రిల్-డిసెంబర్'21)లో 31,439సంఖ్యలు }   |
| 9  | <p><b>ట్రాన్స్ మిషన్ - కాలం గతించిన కండక్టర్పై విద్యుత్ సరఫరా చేయడం వల్ల వస్తున్న నష్టాలు :-</b></p> <p>ట్రాన్స్ మిషన్ కండక్టర్లు 80-85 సంవత్సరాల క్రితం వేసిన వాటితోనే విద్యుత్ సరఫరా చేస్తున్నారు. ఫలితంగా సరఫరా నష్టాలు ఎక్కువగా ఉంటున్నాయి. చాలా పంపుసెట్లకు 5-6 పోల్స్ దూరం సర్వీస్ వైరుతో రైతులకు కనెక్షన్లు ఇచ్చారు. దీనివల్ల లో ఓల్ట్జే సమస్య వస్తున్నది. 20 సంవత్సరాలు కాలం గతించిన కండక్టర్ను మార్పిడికి దెబ్బతిన్న స్తంబాలను తిరిగి కొత్తవి వేయడానికి రెగ్యులేరీ కమీషన్ ఆదేశాలు ఇవ్వాలి.</p> | <p>పాత/దెబ్బతిన్న కండక్టర్ను రీకండక్టరింగ్ చేయడం జరుగుతోంది మరియు 01.04.2021 నుండి 31.01.2022 వరకు రీకండక్టరింగ్ పనుల కోసం రూ.10.717 కోట్ల బడ్జెట్ కేటాయించబడింది. చాలా వరకు రీకండక్టరింగ్ పనులు ప్రాసెస్లో ఉన్నాయి. తద్వారా లైన్ నష్టాలు తగ్గుతాయి.</p>  |
| 10 | <p><b>నిర్వహణ కమిటీలు ఏర్పాటు చేయాలి :-</b></p> <p>విద్యుత్సంస్థల 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. పై అంశాలతో పాటు మరికొన్ని</p>  | <p>TSSPDCL ప్రతి నెలా విభాగాల వారీగా సమస్యలను సమీక్షిస్తోంది, ఇందులో డిమాండ్, సేకరణ, బుక్ చేసిన కేసుల సంఖ్య, DTR వైఫల్యాలు, PTR వైఫల్యాలు, % మీటరింగ్, తక్కువ వోల్టేజీ సమస్యలు మొదలైనవి వివరంగా సమీక్షించబడతాయి మరియు లేవనెత్తిన సమస్యలు/సమస్యలు పరిష్కరించబడతాయి/కనిష్టికరించబడతాయి.</p> <p>పైన పేర్కొన్న వాటికి అదనంగా, పల్లె ప్రగతి మరియు పట్టణ ప్రగతి కార్యక్రమాల క్రింద, నెట్ వర్క్ మెరుగుదల మరియు భద్రత కోసం జతచేయబడిన జాబితాలో పేర్కొన్న పనులు</p> |

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|  | <p>అంశాలను మీ ముందు ప్రత్యక్షంగా చెప్పదలచుకున్నాను. కావున అవకాశం<br/>ఇవ్వగలరని కోరుచున్నాను.</p> | <p>చేపట్టబడ్డాయి మరియు పూర్తి చేయబడ్డాయి</p> |
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4. **Y. Chandra Shekar Rao**, plot No.31 SLN Swamy Colony Hyd. Road, Nalgonda – 508001, Ph:- 9441280831, [chandradhe54@gmail.com](mailto:chandradhe54@gmail.com)

| S.No. | Summary of Objections / Suggestions  | Response of the Licensee   |
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| 1     | <p><b>FOUR HOURS/ONE UNIT --- COST Rs.248/-</b></p> <p><b>During ERC public hearing held in April, 2016, I requested to issue CC bills for 30 days taking into account, instead of calendar month. This was appreciated and the Hon'ble Bench directed accordingly. Since then the CC bills are being issued taking 30 days for deciding slab under which , the bill is to be issued, and being issued.</b></p> <p><b>Now, in continuation of the same, I request your kind authority to order to bill 30days / 24 hours, so as to decide the appropriate slab under which it is to be billed.</b></p> <p><b>In detail, as an example, I submit if the meter reader visits, after 30 days at 8 AM of the month, I may get 200 units consumption, exactly and the CC charges comes to Rs.860-00 under domestic category ( As per present proposal ). But, if the meter reader makes a delay by 4 hours, the consumed units will go to 201 units, and the CC charges to be paid will go to Rs.1008-00 at no fault of mine.</b></p> <p><b>This may please be arranged to be verified to know in detail and issue orders accordingly, in the interest of the consumers and also of natural justice</b></p> | <p>TS Discoms opines that the request of the objector to bill the consumer as per 30 days / 24 hours billing is difficult to comply with as per the current network infrastructure.</p> <p>Currently TS Discoms bills the consumers on a 30 days billing. Readings are noted and adjusted after duly taking the readings over a period and averaging out to 30 days bill. Billing of consumer is a continuous process and Discoms are trying their best to record the reading on time.</p> <p>TS Discoms are preparing a scheme for installation of smart meters in a phased manner.</p> |
| 2     | <p><b>RED FLAG TO CONSUMERS:</b></p> <p><b>Previously, when a service connection under Cat.II or III of LT Category, exceeds its connected load over and above, to the level of HT , the consumer has to be issued a notice, get Agreement, collect required development and other charges , and there only to convert to H,T, category, permanently.</b></p>  | <p>Currently Industrial consumers upto 100 HP and rest upto 56 kW are billied under LT category.</p> <p>As per clause 12.3.3.3 of GTCS, in cases where LT category service exceeds its limits, such service shall be billed at the respective HT tariff rate from the consumption month in which un-authorized</p>   |

**But now, SPDCL is issuing CC Bills under HT category, whenever an LT Service, exceeds the contracted load to the level of HT, automatically, duly flagging. There on, next months bills are also being issued under HT category only, though there is no recorded connected load to the level of HT. The consumer has to wake up and to represent the same to the company, and to get letter from the offices of the Asst.Divl.Emg./Op, Divl. Eng./Oprn., Divl.Eng./MRT. Supt.Eng./Oprn., and to submit to CGM/Rev.( ie.Corporate Office, Hyderabad). The CGM/Rev. office has to lift this flag, who is only the competent authority and also to allow further e. bills under LT Category as usual. There on Asst. Accounts Officer/ ERO concerned will adjust excess payment made by the consumer for all these months, against further bills to be issued.**

**In this process, the consumer has to round even for two months to the above offices to get correct bill and to get credit of the excess amount already paid. Though there is no fault on his part.**

**Though, all the employees in these offices are sincere, his paper has to be touched by a minimum of 45 employees, right from computer operator of ADE/OP to CGM/Revenue of the company, and down again to the level of computer operator in ERO, his expenditure will come to a minimum of Rs.10,000-.**

**Even at this juncture, under this process, the company will not get any revenue but temporary credit and adjustment there on.**

**Consumer suffering for two years -at no fault**

**Here, I submit a case. The consumer of LT No. 681901451/III Rojoly (vg. m) Gadwal district having 100 HP CMD got bill under HT tariff for Jan.2020 CC, as the connected load reached 116 HP. But the HT billing continued up to June, 2020, though the connected load is with in the contracted load of 100 HP.. Rounded through departmental offices, vexed and approached the**

additional load is detected till such additional load is removed after inspection by the designated officer. Hence, removal of HT category tag is not possible without the inspection by the designated officer of the company without there being amendment to clause 12.3.3.3 of GTCS to that effect.

TS Discoms have adopted this practice, to enable discipline and maintain safety, and state that such conditions are likely to be continued.

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|   | <p><b>Consumer Grievances Redressal Forum, Hyderabad on 11-5-2020. The Hon.'ble Forum, delivered its judgment on 5-11-2020 ordering to revise from March,20 to June,20, leaving Feb.20 bill for HT billing only. As the consumer paid Feb.20 CC bill, the Forum treated it as the consent of the consumer for HT Billing..</b></p> <p><b>Now the consumer made further appeal to the Hon.'ble Vidyut Ombudsman, Hyderabad on 25-10-2021, which is pending for disposal.</b></p> <p><b>As such I request the kind authority to advice the company to bill the service under HT category, whenever it exceeds the contracted load to the level of HT, for that month only, and also for the successive months, if the load is over and above to the level of HT. If there is constant consumption of HT level, for three to four months, the service connection may be shifted to HT category, permanently.</b></p>   |   |
| 3 | <p><b>SECTION 135 OF ELEC. ACT.</b></p> <p><b>The Designated officers of DPE wing of SPDCL of TS limited, are booking theft of electricity cases under Sec.135 Of Indian Elec., Act., where they and direct tapping. The people involved are only to pay as the levied penalty in full or to file a case in the Court.</b></p> <p><b>In this connection, I respectfully submit that there is no provision to appeal to the departmental officials on the lapses (the accused) noticed in respect of connected load, calculation, hours of usage non-utilization of some of the equipment etc., which they penalize, hastily,</b></p> <p><b>It is against principles of natural justice to levy death penalty, without hearing the accused, irrespective of seriousness of crime.</b></p> <p><b>I am also to submit here, as these are approaching Courts, and getting directions to departmental officials, the SPDCL is not getting revenue on one</b></p> | <p>TS Discoms opines that theft of electricity is causing Discoms heavy losses in terms of Revenue &amp; AT&amp;C losses. In a situation where TS Discoms discover the theft of electricity, they under their best understanding, calculate the connected load, hours of usage etc. to penalize the consumer.</p> <p>Also as per EA 2003, Section 135 (2) -</p> <p><i>Any officer of the licensee or supplier as the case may be, authorized in this behalf by the State Government may --</i></p> <p><i>(a) enter, inspect, break open and search any place or premises in which he has reason to believe that electricity 2[has been or is being,] used unauthorisedly;</i></p> <p><i>(b) search, seize and remove all such devices, instruments, wires and any</i></p> |

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|   | <p>side and are subjected to round SLAs/BLCs, legal section and courts, on the other, at the cost of their valuable time to maintain uninterrupted power supply to Telangana people, at large.</p> <p>As such, I request your good office to review the Section 135 and recommend appropriate relief, so as to have appealing provision to the SPDCL officials, to see improvement in revenue collection on one point, and also to have new services, avoiding directing tapping on the other.</p>   | <p><i>other facilitator or article which has been, or is being, used for unauthorized use of electricity;</i></p> <p><i>(c) examine or seize any books of account or documents which in his opinion shall be useful for or relevant to, any proceedings in respect of the offence under sub-section (1) and allow the person from whose custody such books of account or documents are seized to make copies thereof or take extracts therefrom in his presence.</i></p> <p>Further, TS Discoms shall abide by the directions given by the Hon'ble Commission and Electricity Act 2003.</p> |
| 4 | <p><b>COMMON SERVICE; BECAME COMMON MISTAKE</b></p> <p><b>This is the new invention of the Company. The meter reader on his arrival to the house, asks whether the service is of 'common purpose In confusion if the consumer says 'yes' not knowing the consequences of billing. Without or verifying the premises, the meter reader applies change of Slab to LT-I(B)(ii)category. With the result the consumers gets the bill @ Rs.5-00 per unit (Rs.5-50 as per proposed tariff ).</b></p> <p><b>When consumer realizes and applies for old slab, is to be certified by various levels of field officers and finally, our Corporate office only, has to revert the slab, All most all distributions of the circle had this bad experience, which consumes valuable time of the staff.</b></p> <p><b>As such I request your kind authority to suggest to have a field inspection report, of the competent authority before change of the slab</b></p> | <p>The common service flag is being done after inspection by the field officers through billing staff.</p>  |
| 5 | <p><b>'SET ASIDE' EVEN AFTER 14 YEARS.</b></p> <p><b>Particularly, I submit that in September, 2007, the Internal Audit pointed out a short fall of nearly Rs.35,000-00 each against, some of the LT services, in</b></p>  | <p>The Clause of GTCS, tariff conditions and regulations approved by the Hon'ble TSERC are being followed.</p>  |

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|   | <p><b>ERO Nalgonda. Aggrieved, the consumers approached the Hon'ble High Court, Hyderabad, in December 2007, and got interim directions in Feb. 2008 and final orders in November, 2010, directing the impugned '. Surcharge is set aside'. Basing on the orders, the consumers are paying their CC bills regularly. But the department took literal meaning of the 'set aside' word and displaying the arrears with surcharges accumulated month after month, and it reached now Rs.1,70,000-00, of each service. Even after 14 years, the department is not taking interest to with draw the amount totally, As there is no threat either for payment or for disconnection, all these years.</b></p> <p><b>Whenever a consumer applies for delete the amount, the AA0s/ERO are forwarding to the higher officials, to the level of Corporate office, and in turn, they are getting directions to take appropriate action, under intimation</b></p> <p><b>There are more than 20 such cases in Nalgonda circle, awaiting legal meaning of the word 'set aside'</b></p> <p><b>I request your kind authority to direct the department to withdraw/ finalize these cases, in the light of the judgment, and relieve these consumers, of 14 years unnecessary burden.</b></p> |  |
| 6 | <p><b>REVENUE COLLECTION MACHINES WITH BILLINGS:</b></p> <p><b>At present the department meter reader is coming to the consumers' premises and issuing bills, as per consumption. Then, the consumer has to go to CC charges collection centers, for making payment or to make payment through on line facility. Most of the consumers, particularly uneducated, age old and rural people cannot take advantage of on line payment and have to rush to the collection points arranged by the department.</b></p> <p><b>In this connection, I request to issue collection of CC charges machines also to</b></p>  | <p>Presently the spot billing machines are being used for collection purpose also. However, the suggestion of the objector will be implemented after verification of the feasibility of allowing the private meter readers to collect the cash collection duly ensuring the safety measures.</p> |



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|  | <p><b>these meter readers to make instant payment at his door, which is convenient to all consumers at large. The department will also get most of the revenues without delay and without out extra expenditure</b></p> |  |
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5. **S. Surya Prakasa Rao** Former Director (Commercial), erstwhile APCPDCL and Former Secretary erstwhile APERC, Flat.no.105, Ashok Chandra Enclave, 11-4-660 Redhills, Hyderabad-500004, Mobile:9392272754

| S.No. | Summary of Objections / Suggestions   | Response of the Licensee  |
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| 1     | <p><b>General and Specific Conditions:</b></p> <p><b>Discom proposed changes in General and Specific Conditions of Tariff with elaborate reasoning. The efforts put in is commendable. Proposal of uniform tariff hike of 50 and 100 paise /unit for most of the categories requires review by the Hon'ble Commission considering relevant aspects like limitations on cross subsidisation, etc as per the Tariff Policy, 2016.</b></p> | <p>TS Discoms would like to state that the last tariff hike approved by the Hon'ble commission was in FY 2016-17. TS Discoms have proposed the tariff hikes for different consumer categories and their respective sub-slabs. The objection made in terms of uniform hike for most of the consumer categories, can be addressed through following points -</p> <ul style="list-style-type: none"> <li>● 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.</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> <p>Having said that, TS Discoms shall abide by the directions given by the Hon'ble Commission, in terms of the provisions mentioned in the Tariff Policy 2016 etc.</p> |
| 2     | <p><b>Revenue Gap:</b></p> <p><b>SPDCL expects to fetch additional revenue of Rs.5,044 Crs through proposed tariffs, but is still short of Rs. 2,687 Crs against the Annual Revenue</b></p>   | <p>TS Discoms propose that the remaining revenue gap of Rs. 2687 crore for TSSPDCL and Rs.1410 crore for TSNPDCL will be met by improving the internal efficiencies of Discoms. This would be done predominantly by measures like reduction of T&amp;D losses in</p>  |

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|   | <p><b>Requirement (ARR) of Rs. 34,870 Crs after accounting for government subsidy of 1398 Crs. The Discom didn't mention how it wants to make good this revenue deficit.</b></p>  | <p>operational circles, improvement of metering and billing efficiency, improvement of technical performance of Distribution system.</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>• Replacement of existing meters with smart meters in a phased manner.</li> </ul>   |
| 3 | <p><b>Government Subsidy:</b></p> <p><b>It is noted from 2018-19 Tariff Order that the subsidy of 1398 Crs is towards Domestic and Agricultural consumers. This amount is insufficient to meet the costs of free supply of about 11,000 MU to LT Agricultural consumers, which works out to about Rs.10, 000 Crs @ Rs.9.20 /unit as per category wise cost of supply details given in AAR filings. This implies substantial X-subsidy contribution from subsidizing categories.</b></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. Additionally, TS Discoms receive a subsidy from TS Government to the tune of Rs. 5,652 Crs. with respect to the power supply to agriculture consumers and domestic 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 committed 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> |
| 4 | <p><b>Increase in Fixed/ Demand Charges:</b></p>  | <p>TS Discoms would like to state that the last tariff hike approved by</p>   |

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| <p><b>It is stated that the Discoms are able to recover only 13% of ARR through existing Fixed/Demand Charges while the Fixed Cost component in AAR is 56% and they propose to increase it 15.7%. The report of MOP is cited to justify the hike as well as to levy it on all categories.</b></p> <p><b>It's a misconception that Fixed Costs arising out of PPAs with Genco/PPPs have to be recovered by way of Fixed/Demand Charges in the Retail Tariffs from crores of consumers, because;</b></p> <ol style="list-style-type: none"> <li><b>1) the energy charges in tariffs are not being limited to the average Variable Cost in PPAs</b></li> <li><b>2) the PPAs stand on an entirely different footing compared to consumer agreements for supply, which are one-sided agreements without any safeguards for consumers against F/M etc.</b></li> </ol> <p><b>High Demand Charge is onerous to Small / Medium scale industries which normally operate at low/ medium load factors.</b></p> <p><b>Demand Charge of Rs.475/Kva/ month translates to about Rs.1.30/unit in energy terms for an industry operating at 50% Load Factor(L/F). Thus, with the proposed energy charge of Rs.7.65/unit for 11kv supply, the overall unit rate works out to about Rs.9.25 /unit including TOD component. In fact the Cross Subsidy Surcharge(CSS) proposals reveal that the average realization from this category is Rs.9.54 even at the existing tariffs, which means that the actual average L/ F for this category is much less.</b></p> <p><b>This is not conducive for increase in energy sales to the subsidizing sectors for improving the revenues of Discoms.</b></p> <p><b>I suggest the following Demand Charge structure for HT Industries:</b></p> <p><b>11kv supply : Rs. 250/Kva/month</b><br/> <b>33 kv supply : Rs. 400/Kva/month</b></p> | <p>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> <p>TS Discoms have proposed the tariff hikes for different consumer categories and their respective sub-slabs. 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 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.</p> <p>Also, by way of introducing fixed charges for LT Domestic and increasing demand charges for various categories, TS Discoms have tried to rationalize the tariff structure as per National Tariff Policy, 2016.</p> <p>TS Discoms would like to state that even if the load factor of a particular consumer is low, the Discoms are committed to meet their MW requirement at any given point of time, by tying up with the generators and building the relevant network. Hence, TS Discoms have followed uniform fixed charges across the different voltage levels.</p> <p>While, the objector has suggested a revised demand charge structure, but there has been no explanation given on how such charges shall address the revenue gap of Discoms.</p> <p>Hence, TS Discoms request the Hon'ble Commission to consider their tariff proposals for FY 2022-23.</p> |
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|          | <p><b>132 &amp; above : Rs. 425/Kva/month</b></p>  |  |
| <p>5</p> | <p><b>Domestic Tariffs:</b></p> <p><b>In the present structure there are many Groups and many slabs in each group. It may be desirable to simplify the Tariff structure by dispensing with groups and limiting the number of slabs to 4 on Socio-economic basis as follows:</b></p> <p><b>Poor class : 0-30 units/month</b><br/> <b>Lower middle : 31-100</b><br/> <b>Upper middle : 101-200</b><br/> <b>Upper class : Above 200</b></p> <p><b>Tariff may be fixed in terms of para 8.3.2 of the Tariff Policy, 2016 and billed on 'Telescopic' method as follows:</b></p> <p><b>Poor class .....at 50% of average COS,</b><br/> <b>lower middle class .....at 80 %</b><br/> <b>upper middle class .....at 100 %</b><br/> <b>Upper class .....at 120 %</b></p> <p><b>Lesser slabs and Telescopic billing will avoid the tendency of consumers to seek multiple services for savings in the electricity bill. This structure / rates reduce the requirement of X-subsidy from other categories and will be a step forward in rationalization of tariffs.</b></p> <p><b>State Government may grant subsidy to any sub class u/s 65 of the Act if it so</b></p> | <p>TS Discoms understand that the objector's suggestion is in line with the MOP's directive on tariff simplification.</p> <p>TS Discoms would like to state that the existing classification of domestic slabs was done keeping in mind the socio-economic status of the consumers. While, the proposed tariff structure by the objector, if done abruptly, would adversely impact the lower and poor class of domestic consumers.</p> <p>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.</p> <p>For LT Domestic, the proposed tariffs are still significantly lower than the Cost of Service for FY 2022-23.</p> <p>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.</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> |

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|   | <b>decides.</b>   |  |
| 6 | <p><b>Minimum Energy condition for LT Industrial consumers:</b></p> <p><b>Proposal to bill Minimum of 25 units per HP of contracted load is unreasonable as the total connected /contracted load doesn't impose demand on the power system.</b></p> <p><b>I suggest that the minimum energy may be billed on Recorded Demand instead of on contracted load.</b></p>   | <p>TS Discoms would like to state that the Minimum Energy charges are currently levied on the Billing Demand in HT categories. In the absence of such Billing demand concept for LT Industrial consumer, a similar proposal was made on the contracted load, in line with the HT industrial category.</p>  |
| 7 | <p><b>Changes in General and Specific Conditions of Tariff (para 2.1.3 of Tariff Filings)</b></p> <p><b>(a) Clause (i) (1) : Multi-storied building /apartment used by single owner/tenant.</b></p> <p><b>The contention of the Discoms that there's no clarity in clause 7.4 of Tariff Order, is not correct. The said clause is to be read with clause 5.3.1of GTCS which clearly defines 'separate establishment'. Clause 5.3.2 specifies that each 'separate establishment' will be given separate connection. Cl.5.3.2. 2 enables the officers authorized by Discom to treat multiple services as a single service and merge them into single service in case of misuse by splitting the installations.</b></p> <p><b>In the face of such clear provisions of GTCS which are statutory, the CGRF/Ombudsman/HC wouldn't set aside the actions of Discoms if proper procedure is followed.</b></p> <p><b>Misuse / Malpractices if any by a few consumers, have to be dealt with as per</b></p> | <p><b>Response to 7 (a)</b></p> <p>As elaborated in its tariff proposals, TS Discoms are trying to address the lack of clarification in the clause 7.44, 7.45, on the provisions related to consumption in a multi-storied building/apartment. TS Discoms have been unable to club the multiple services, as the consumers are approaching the Courts and due to lack of clarity in the specific terms and conditions of tariff, the orders are being issued in favor of the consumers.</p> <p>The proposed clauses would assist the Discoms in handling such cases better and arrest revenue leakages, as a result of such malpractices/misuse.</p> |

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| <p><b>GTCS and Sec.126 of the Act. Rules should not be changed to cause hardship to vast majority genuine consumers due to misuse by a few consumers.</b></p> <p><b>Hence the proposal of Discoms may not be accepted by the Hon'ble Commission.</b></p> <p><b>(b). Cl.(ii) on Deration of CMDs</b></p> <p><b>Deration of CMD by consumers is essentially a matter of conditions of supply covered by the Regulations made u/s 43 , 50 of the Act read with GTCS approved by the Commission as amended from time to time. Hence it doesn't not fall in the scope of Tariff proceedings.</b></p> <p><b>I remember that 50% Demand Charges were collected for 'temporary deration' facility which was allowed in the past. The same may restored if that facility is not in vogue now.</b></p> <p><b>The terms in respect of high revenue yielding consumers should be liberal as a matter of commercial principle.</b></p> <p><b>(c). Cl.(iii). Proposal to bill fixed charges on Recorded Demand in the cases of exceeding contracted load.</b></p> <p><b>Such cases will be very few, but not 'most of the consumers' as stated in the filings, as the LT installations normally have high diversity factor and low load factor. The cases of exceeding contracted load may be dealt as per clause 12.3.3.1 of GTCS.</b></p> | <p><b><u>Response to 7 (b)</u></b></p> <p>TS Discoms would like to state that there are no separate conditions for deration and restoration of CMD in the Tariff Order, due to which the consumers are derating the CMD to avoid demand charges and subsequently restoring the CMD whenever required. Due to this drop in demand, the licensee has to bear the under recovery of the fixed costs of power procurement from various sources.</p> <p>Hence, the licensee proposes to levy 50% of fixed/demand charges for restoration of CMD in order to avoid revenue deficit.</p> <p><b><u>Response to 7 (c)</u></b></p> <p>TS Discoms would like to state that no penalty is being levied on such consumers exceeding the contracted load, which is resulting in revenue loss to the Discoms.</p> <p>There is a clause for such cases for LT III Industrial category but it is not there for LT-II, LT-IV, LT-VI, LT-VII and LT-VIII categories. Hence the TS Discoms have requested the Hon'ble Commission for the</p> |
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| <p><b>Connected load is really not relevant for tariff purposes in LT services as in the case of HT services, except for the broad classification for supply under LT or HT Tariffs</b></p> <p><b>With the digital metering already in place, Fixed Charges can be billed on 'Demand' basis at appropriate demand charge for all LT metered services irrespective of contracted load, as in the case of HT services.</b></p> <p><b>Hon'ble Commission may take a view whether to amend the relevant provisions of GTCS/Supply Code after due consultation process with all stakeholders.</b></p> <p><b>(d). Para 2.1.5 : Mandatory pre-paid metering for Government services</b></p> <p><b>This proposal is welcome, but Discoms have to obtain prior consent of owner of the service for pre-paid metering as it's an option given to consumers u/s 47 (5) of the Electricity Act 2003 as it stands today.</b></p> <p><b>(e). Para 2.1.6 : OA facilitation charge</b></p> <p><b>The proposed amount of Rs.20,000 may be collected as one time charge for processing the application for OA for the first time.</b></p> <p><b>Monthly charges may be levied in the nature of 'customer charge' applicable to that category or at a higher rate as may be specified by the Commission in addition to the customer charge payable for Discom supply.</b></p> | <p>same.</p> <p><b><u>Response to 7 (d)</u></b></p> <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 MOP notification.</p> <p><b><u>Response to 7 (e)</u></b></p> <p>TS Discoms are incurring financial burden in the form of O&amp;M cost i.e., exclusive team of employees cost, additional infrastructure cost, etc. A 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. Hence the licensee has proposed an amount of Rs. 20,000 per month or part thereof to meet the reduce the financial burden.</p> |
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| 8  | <p><b>Cross Subsidy Surcharge:</b></p> <p><b>Discom rightly stated that while the tariffs are not within 20 % of average Cost of Supply, the CSS is limited to 20 %. Apparently Discom consumers are being discriminated against OA consumers.</b></p> <p><b>Hon'ble Commission may rectify this anomaly by specifying the trajectory for reduction in Cross Subsidy as required u/s 181(2)(p) read with 3rd proviso of Sec.42 (2) in the interest of tariff rationalization.</b></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>   |
| 9  | <p><b>Automatic pass through of power purchase costs:</b></p> <p><b>Referring to the problems arising out of the Electricity (Timely Recovery of Costs due to Change in Law) Rules, 2021 notified by GOI, the Discom requested the Commission to amend Reg.no.4 of 2005 for automatic recovery of power purchase cost variations from consumers on monthly basis.</b></p> <p><b>Hon'ble Commission may please initiate proceedings for amending Reg.no.4 of 2005 and Reg.1of 2014 without waiting for completion of these tariff proceedings.</b></p> | <p>TS Discoms had earlier filed a petition for amending the existing clause related to power purchase cost variation, to which the Hon'ble Commission in its order dated 02.06.2021, had mentioned the following - "The Commission would treat the submissions of the TSDISCOMs as suggestion/input as and when the Commission initiates the process of adding to or amending or varying regulation relating to the Terms and Conditions for Determination of Tariff for wheeling and Retail Sale of Electricity. The TSDISCOMs are also at liberty to place any more inputs when the Commission invites comments/suggestions on any such draft regulation on the subject matter."</p> |
| 10 | <p><b>NPDCL</b></p> <p><b>My views as submitted above will generally apply to NPDCL also except for Numbers.</b></p> <p><b>I request the Hon'ble Commission to consider the above submissions before deciding the tariff petitions of Discoms.</b></p>  | <p>TS Discoms have addressed the abovementioned objections, in context of both TSSPDCL and TSNPDCL.</p>  |

6. [Sai durga Ferro Alloys PVT ltd. ,](#) Survey no.203,NH 65 Korlapahad, Kethepally(Mandal), Nalgonda district 508211, Telangana email: [saidurganalgonda@gmail.com](mailto:saidurganalgonda@gmail.com) Cell :9490571719

| S.No. | Summary of Objections / Suggestions  | Response of the Licensee  |
|-------|--|---|
|       | <p>వచ్చే ఆర్థిక సంవత్సరంలో power Tariff కి సంబంధించిన HT -1B Ferro Alloys Industry కి సంబంధించిన విషయముగూర్చి ఎవరిని ఇచ్చటగూర్చి 2022 - 2023 NLG - 665 kVA :- 4000 MD అయ్యా</p> <p>పై విషయానుసారము మా యొక్క Ferro Alloys industry కి సంబంధించిన category HT -1B మరియు power Tariff మార్పు చేస్తున్నట్లగా మాకు తెలియవచ్చినది వచ్చే ఆర్థిక సంవత్సరంలో అనగా 2022 - 2023 మా యొక్క Ferro Alloys industry పూర్తిగా power విద్యుత్ శక్తి పైన ఆధారపడిన పరిశ్రమలు మరియు మా యొక్క industry small Scale industry కావున మీరు ఉదహరించబడిన category change చేసి Tariff పెంచినచో మా యొక్క industry మూతపడే అవకాశాలు చాల ఎక్కువ</p> | <p>కాస్ట్ అప్ సర్వీస్ రూ.5.91/unit నుండి రూ.7.14/unit కి పెరగడం వలన మరియు 5 సంవత్సరాల నుండి టారిఫ్ పెంపు లేనందు వలన అనివార్య పరిస్థితుల్లో డిస్కామ్ వారు టారిఫ్ పెంపు ప్రతిపాదనలని ఈ ఆర్ సి వారికి సమర్పించడం జరిగింది.</p> |

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| <p>తద్వారా చిట్టి industry పై ఆధారపడి జీవిస్తున్న 200 కుటుంబాలు జీవన స్థితిగతులు రోడోనా పాడుతారు కావున category I -B యధాప్రకారం ఉంచి tariff యధాప్రకారంగా కొనసాగించవలసినదిగా అభ్యర్థిస్తున్నాము ఎన్ని రోజులు covid - 19 కరము మా యొక్క industry ఉత్పత్తలకు మార్కెట్ డిమాండ్ లేక చాల ఇబందిపడుతూ ప్రతి నిత్యం సమస్యలతో ఇబ్బందులు ఎదుర్కొనుచున్నాము కావున మా యొక్క HT - I B category ప్రస్తుతానికి కొనసాగించ వలసినదిగా ప్రాధేయపడుచున్నాము కావున ప్రక్క రాష్ట్రము లో A P లో category కొనసాగిస్తున్నారు కావున మనదగ్గర కొద అలాగే category HT - I B మార్చకుండా ఉండగలరని tariff మార్చేయకుండా ఉంచగలరని ప్రార్థన విధంగా మా Industry ని కాపాడగలరని ప్రార్థన</p> |  |
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7. [Lt Col Raghunandan Nair](#) Branch Head(Administration),Tata Consultancy Services Ltd. Synergy Park Unit 1-Phase1, Premises No.2-56/1/36, Survey No.26,Gachibowli,,Serilingampally Mandal, R R Dist Hyderabad-500019, Telangana.Cell No.9295042538

| S.No.      | Summary of Objections / Suggestions   | Response of the Licensee |          |                     |        |            |             |      |          |        |             |      |          |       |             |      |          |        |           |      |          |         |                |                    |          |  |
|------------|---|--------------------------|----------|---------------------|--------|------------|-------------|------|----------|--------|-------------|------|----------|-------|-------------|------|----------|--------|-----------|------|----------|---------|----------------|--------------------|----------|--|
| 1          | <p>We would like to thank your good office for including green tariff in the ARR &amp;FPT for FY 2022-23 which will help the consumers in achieving the RE and sustainability goals. In this aspect, we would like to bring the following for your consideration.</p>   | <p>No Comments</p>       |          |                     |        |            |             |      |          |        |             |      |          |       |             |      |          |        |           |      |          |         |                |                    |          |  |
| 2          | <p><b><u>DISCOMs where Green tariff is Available:</u></b></p> <p>Many DISCOMs in the country have implemented Green Tariff to promote the use of Green Renewable Energy and thus reducing the usage of fossil fuel, which will lead way for a sustainable future. Details of Some of the DISCOMs are given below:</p> <table border="1" data-bbox="317 857 1333 1399"> <thead> <tr> <th>Discom</th> <th>State</th> <th>Green Tariff (Rs/u)</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>TATA power</td> <td>Maharashtra</td> <td>0.66</td> <td>Approved</td> </tr> <tr> <td>MSEDCL</td> <td>Maharashtra</td> <td>0.66</td> <td>Approved</td> </tr> <tr> <td>Adani</td> <td>Maharashtra</td> <td>0.66</td> <td>Approved</td> </tr> <tr> <td>BESCOM</td> <td>Karnataka</td> <td>0.50</td> <td>Approved</td> </tr> <tr> <td>APSPDCL</td> <td>Andhra Pradesh</td> <td>12.25/ Discom unit</td> <td>Approved</td> </tr> </tbody> </table> | Discom                   | State    | Green Tariff (Rs/u) | Status | TATA power | Maharashtra | 0.66 | Approved | MSEDCL | Maharashtra | 0.66 | Approved | Adani | Maharashtra | 0.66 | Approved | BESCOM | Karnataka | 0.50 | Approved | APSPDCL | Andhra Pradesh | 12.25/ Discom unit | Approved | <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 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</p> |
| Discom     | State   | Green Tariff (Rs/u)      | Status   |                     |        |            |             |      |          |        |             |      |          |       |             |      |          |        |           |      |          |         |                |                    |          |  |
| TATA power | Maharashtra   | 0.66                     | Approved |                     |        |            |             |      |          |        |             |      |          |       |             |      |          |        |           |      |          |         |                |                    |          |  |
| MSEDCL     | Maharashtra   | 0.66                     | Approved |                     |        |            |             |      |          |        |             |      |          |       |             |      |          |        |           |      |          |         |                |                    |          |  |
| Adani      | Maharashtra   | 0.66                     | Approved |                     |        |            |             |      |          |        |             |      |          |       |             |      |          |        |           |      |          |         |                |                    |          |  |
| BESCOM     | Karnataka   | 0.50                     | Approved |                     |        |            |             |      |          |        |             |      |          |       |             |      |          |        |           |      |          |         |                |                    |          |  |
| APSPDCL    | Andhra Pradesh  | 12.25/ Discom unit       | Approved |                     |        |            |             |      |          |        |             |      |          |       |             |      |          |        |           |      |          |         |                |                    |          |  |

|                |   |  |                 |             |                 |                |                  |             |                 |                |                |             |                 |              |                |             |                 |             |                |             |                 |   |
|----------------|---|--|-----------------|-------------|-----------------|----------------|------------------|-------------|-----------------|----------------|----------------|-------------|-----------------|--------------|----------------|-------------|-----------------|-------------|----------------|-------------|-----------------|---|
|                | <table border="1"> <tr> <td><b>DPT</b></td> <td><b>Gujarat</b></td> <td><b>0.50</b></td> <td><b>Approved</b></td> </tr> <tr> <td><b>TSSPDCL</b></td> <td><b>Telangana</b></td> <td><b>2.00</b></td> <td><b>Proposed</b></td> </tr> <tr> <td><b>Torrent</b></td> <td><b>Gujarat</b></td> <td><b>0.50</b></td> <td><b>Proposed</b></td> </tr> <tr> <td><b>MGVCL</b></td> <td><b>Gujarat</b></td> <td><b>0.50</b></td> <td><b>Proposed</b></td> </tr> <tr> <td><b>GIFT</b></td> <td><b>Gujarat</b></td> <td><b>0.77</b></td> <td><b>Proposed</b></td> </tr> </table> <p>There was a very good response for the green tariff proposal from the customers, wherever the incremental rate was fixed reasonably (ie. Rs.0.5 to Rs.0.66).</p> | <b>DPT</b>   | <b>Gujarat</b>  | <b>0.50</b> | <b>Approved</b> | <b>TSSPDCL</b> | <b>Telangana</b> | <b>2.00</b> | <b>Proposed</b> | <b>Torrent</b> | <b>Gujarat</b> | <b>0.50</b> | <b>Proposed</b> | <b>MGVCL</b> | <b>Gujarat</b> | <b>0.50</b> | <b>Proposed</b> | <b>GIFT</b> | <b>Gujarat</b> | <b>0.77</b> | <b>Proposed</b> | <p>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> <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> |
| <b>DPT</b>     | <b>Gujarat</b>  | <b>0.50</b>  | <b>Approved</b> |             |                 |                |                  |             |                 |                |                |             |                 |              |                |             |                 |             |                |             |                 |   |
| <b>TSSPDCL</b> | <b>Telangana</b>  | <b>2.00</b>  | <b>Proposed</b> |             |                 |                |                  |             |                 |                |                |             |                 |              |                |             |                 |             |                |             |                 |   |
| <b>Torrent</b> | <b>Gujarat</b>  | <b>0.50</b>  | <b>Proposed</b> |             |                 |                |                  |             |                 |                |                |             |                 |              |                |             |                 |             |                |             |                 |   |
| <b>MGVCL</b>   | <b>Gujarat</b>  | <b>0.50</b>  | <b>Proposed</b> |             |                 |                |                  |             |                 |                |                |             |                 |              |                |             |                 |             |                |             |                 |   |
| <b>GIFT</b>    | <b>Gujarat</b>  | <b>0.77</b>  | <b>Proposed</b> |             |                 |                |                  |             |                 |                |                |             |                 |              |                |             |                 |             |                |             |                 |   |
| 3              | <p><b><u>Green Tariff- Beneficial to All</u></b></p> <p>The option of Green Tariff is being proposed for those who wish to avail power from non-conventional sources of energy voluntarily and show their support to an environmental cause. We feel that the incremental cost proposed should be in such a way that the tariff should attract more consumers, on this sustainable journey. In turn it will help in a better revenue generation for the DISCOM.</p>   | <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> |                 |             |                 |                |                  |             |                 |                |                |             |                 |              |                |             |                 |             |                |             |                 |   |
| 4              | <p>We request your good office to consider, the rates to be encouraging and conducive for the consumers to embrace the new option.</p> <p>In view of the above, we are submitting that the Green tariff be fixed at a maximum incremental cost of Rs.0.50 per unit.</p>   |  |                 |             |                 |                |                  |             |                 |                |                |             |                 |              |                |             |                 |             |                |             |                 |   |

**8. Jayamma, W/o Late Chintapally Satyanarayana, Chaarakonda , Village, Vongure (Md), Mhabubnagar, Dist  
PresentAdres: Nagarjuna colony, Raganna Guda, village, Abdulla Purmet Mandal, RR.Dist**

| S.No. | Summary of Objections / Suggestions   | Response of the Licensee   |
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|       | <p>డిస్ట్రిబ్యూషన్ మరియు రిటైల్ సాప్లయి చేస్తున్న కంపెనీ టారిఫ్ ప్రతిపాదన ఇతర విషయాలపైనా అభ్యంతరములు మరియు సలహా గురుంచి గౌరవనీయ తెలంగాణ ఎలక్ట్రిసిటీ రెగ్యులేటరీ కమిషన్ వారి తేదీ 29 - 12 - 2021 బహిరంగా ప్రకటన సందర్భముగా తమరు నిర్వహించే డిస్కమ్ ల బహిరంగ విచారణలో నా సమస్యను విచారించి నాకు న్యాయము చేయగలరని కోరుట గురించి.</p> <p>నేను శ్రీమతి జయమ్మ భర్త చింతపల్లి సత్యనారాయణ R / O చరగొండ గ్రామము వంటూరు మండల్ మహబూబ్ నగర్ జిల్లా ప్రస్తుతానివాసము నాగార్జున కాలనీ రాగన్న గూడ గ్రామము అబ్దుల్లాపురమేట్ మండలము రంగారెడ్డి జిల్లా నేను మరియు నా భర్త నా ఇద్దరు ఆడపిల్లలతో సాయ బ్రతుకు దెరువు కొరకు రాగన్నగూడ వచ్చి నా భర్త కూలి పని చేస్తూ భావన నిర్మాణము చేస్తున్నప్పుడు అక్కడే ఉన్న కరెంటు వైర్లకు ఇనుపరాడ్లు తగిలి కరెంటు షాక్ తో మరణించాడు నా భర్త మరణించిన తర్వాత నా ఇద్దరు ఆడపిల్లలు ఆనాధలు అయినారు నా కుటుంబ పోషణకు చాల కష్టముగా ఉన్నది కావున నా</p> | <ol style="list-style-type: none"> <li>1. రూ. 5,00,000/- మేరకు ఎక్స్‌గ్రేషియా మంజూరైంది (మెమో.నం. CGM/Op/RR జోన్/Hyd/DE(T)/ADE(T)/F.No. /D.No. 730, Dt 02.07.21)</li> <li>2. మంజూరైన ఎక్స్‌గ్రేషియా సరూరనగర్ సర్కిల్లోని CGM (Op)/RR జోన్/యాక్సిడెంట్ CR.నం17, 21, 22 గా నమోదైంది.</li> <li>3. మంజూరైన ఎక్స్‌గ్రేషియా ఆధారంగా DE/OP/ఇబ్రహీంపట్నం మరియు ADE/Op/తుర్కయమంజల్ ఎక్స్‌గ్రేషియా ప్రతిపాదనలను సమర్పించాల్సిందిగా సూచించబడింది.</li> <li>4. LOC ని వర్తింపజేయడానికి ప్రతిపాదనలు ప్రక్రియలో ఉన్నవి.</li> </ol> |

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| <p>కుటుంబము జీవనము కొరకు నా భర్త కరెంటు షాక్ కు వలన మరణించినందుకు పరిహారము కొరకు సంబంధిత విద్యుత్ అధికారులకు దరఖాస్తు చేసుకున్న ఎటువంటి పరిహారము ఇవ్వలేదు కావున తరరు సహాయముతో స్పందించి నాకు పరిహారము ఇప్పించి నాకు న్యాయము చేయగలరని ప్రార్థన.</p> |  |
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**9. [Telangana Ferro Alloys Producers Association](#), 6-2-913/914, 3rd floor, Progressive Towers, Khairatabad, Hyderabad 500004, Tel:- +91 7780439969; +91 7013663700, Email: [tfapa19@gmail.com](mailto:tfapa19@gmail.com)/[tfapa19@yahoo.com](mailto:tfapa19@yahoo.com)**

| S.No. | Summary of Objections / Suggestions  | Response of the Licensee   |
|-------|--|--|
| 1     | <p>We, Telangana Ferro Alloys Producers Association, humbly submit the following observations and suggestions as to the new Tariff proposals for 2022 - 2023 of both the Power Discoms, Telangana State.</p> <p>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.</p>                     | No comments  |
| 2     | <p>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&amp;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.</p> | <p>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 &amp; TS Discoms to provide quality &amp; reliable supply to the consumers currently our state has moved to power sufficient state where do not have any power deficit (0%, Dec 2021)</p> |
| 3     | <p>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 paise per unit for the Financial Year 2021-22.</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, Rajashtan, Punjab, Maharashtra, Delhi, West Bengal etc. are higher as compared to HT Ind. Tariff in Telanagana.</p>      |



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| 4 | <p><b>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 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.</b></p> | <p>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. Thus, TS Discoms have proposed ferro alloys tariff in line with the HT Ind. Tariff.</p> <p>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.</p> <p>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.</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> |
| 5 | <p><b>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.</b></p>  | <p>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.</p>   |
| 6 | <p><b>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</b></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, Rajashtan, Punjab, Maharashtra, Delhi, West Bengal etc. are higher as compared to HT</p>   |

|       | <p><b>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.</b></p>  | <p>Ind. Tariff in Telanagana.</p> <p>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.</p> <p>Thus, TS Discoms have proposed ferro alloys tariff in line with the HT Ind. Tariff.</p>   |                             |                                |                             |                    |    |                |      |      |      |    |           |                             |      |       |  |
|-------|---|--|-----------------------------|--------------------------------|-----------------------------|--------------------|----|----------------|------|------|------|----|-----------|-----------------------------|------|-------|--|
| 7     | <p><b>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.</b></p> <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>1.</td> <td>Andhra Pradesh</td> <td>4.95</td> <td>4.95</td> <td>0.00</td> </tr> <tr> <td>2.</td> <td>Telangana</td> <td>5.00* Plus Demand Charges.*</td> <td>6.65</td> <td>+1.65</td> </tr> </tbody> </table> <p><b>*Introduction of Demand Charges @ Rs.475 per KVA</b></p> | 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 | 2. | Telangana | 5.00* Plus Demand Charges.* | 6.65 | +1.65 | <p>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.</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> |
| 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                           |                             |                    |    |                |      |      |      |    |           |                             |      |       |  |
| 2.    | Telangana   | 5.00* Plus Demand Charges.*  | 6.65                        | +1.65                          |                             |                    |    |                |      |      |      |    |           |                             |      |       |  |
| 8     | <p><b>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.</b></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, Rajashtan, Punjab, Maharashtra, Delhi, West Bengal etc. are higher as compared to HT Ind. Tariff in Telangana.</p> <p>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.</p> |                             |                                |                             |                    |    |                |      |      |      |    |           |                             |      |       |  |

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|    |   | 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.  |
| 9  | <b>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.</b>  | No comments   |
| 10 | <b>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. There will be no level playing field for the Ferro Alloy industry of Telangana with neighbouring States and dumping imports from China to continue manufacturing operations.</b> | 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, Rajashtan, Punjab, Maharashtra, Delhi, West Bengal etc. are higher as compared to HT Ind. Tariff in Telanagana.<br><br>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 | <b>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.</b>   |   |
| 12 | <b>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</b>   | TS Discoms have duely 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.  |

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|    | <p>been considered while submitting the revised proposals both for increase for tariff and as well as additional Demand Charges.</p>   |   |
| 13 | <p><b>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.</b></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. Hence, TS Discoms believe that the proposed tariff hike is inevitable and justified to improve its financial condition and accordingly request the Hon'ble Commission to approve the same after due</p> |

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|                              |   | regulatory proceedings.   |
| 14                           | <b>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 cope 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.</b>   | TS Discoms shall abide by the directions given by the Hon'ble Commission, and the Govt. of Telangana.   |
| 15                           | <b>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.</b><br><br><b>Keeping in view of the above submissions, it is prayed that TSERC to re-look the new tariff proposals before giving the consent 86 approval to the Discoms for implementation of the new tariff schedule for HT1B category for the year 2022-2023.</b> |   |
| <b>Additional Objections</b> |   |   |
| 1                            | <b>As narrated earlier, this category is high power intensive units and substantial prt, 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.</b>   | TS Discom believe that issues like competitions from other state can be overcome by improving the operational efficiency.<br><br>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 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 |
| 2                            | <b>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</b>  |   |

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|   | <p>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 Honble 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>   | <p>in terms of Power purchase cost, Transmission and Network cost etc. have increased significantly, leading to a constantly increasing revenue gap.<br/>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 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.</p> |
| 3 | <p>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 L7 .09 .2018 and the other order dated O4.10.2021 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.</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, Rajashtan, Punjab, Maharashtra, Delhi, West Bengal etc. are higher as compared to HT Ind. Tariff in Telangana</p> <p>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.</p> <p>Thus, TS Discoms have proposed ferro alloys tariff in line with the HT Ind. Tariff.</p>   |
| 4 | <p>The following aspects and additional objections are highlighted as most of the Ferro Alloy units are only connected to 132 KV, the sEune is submitted in respect of such class of 132 KV out of Ferro Alloys Manufacturing Industries category</p>   | <p>Thus, TS Discoms have proposed ferro alloys tariff in line with the HT Ind. Tariff.</p>   |
| 5 | <p>Earlier this Honble Commission, considering the fact of high power intensive,</p>  | <p>TS Discoms have also carried out analysis to understand the other</p>   |

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|   | <b>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</b>   | power intensive industries like Steel Industries, Cement Industries etc. These industries are also billed under same HT Ind. Tariff in all states across India.  |
| 6 | <b>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</b>   | 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.<br><br>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. |
| 7 | <b>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 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</b>   |  |
| 8 | <b>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.O.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.</b> | TS Discoms shall abide by the order of Hon'ble TSERC   |
| 9 | <b>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,</b>  |  |

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|    | <b>the said proposal is arbitrary and on the face of it, and deserves to be rejected</b>   |             |
| 10 | <b>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 industry, 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 power consumed by these units which is very high and only will increase cost of power to Ferro alloys industry</b> |             |
| 11 | <b>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.</b>  | No comments |



| 10. <a href="#">Anil Agarwal</a> , Sr. Vice President <a href="#">FTCCI</a> (The Federation of Telangana Chambers of Commerce and Industry) |   |   |
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| 11. <a href="#">Gopinath Injeti</a> , CEO, <a href="#">SICMA</a> (South Indian Cement Manufacturers' Association)                           |   |   |
| S.No.   | Summary of Objections / Suggestions   | Response of the Licensee  |
| 1   | <p><b>STATEMENT OF OBJECTIONS</b></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>This Statement of Objections is being filed on behalf of the "SOUTH INDIAN CEMENT MANUFACTURERS' ASSOCIATION" (SICMA), an association of major cement manufacturers across South India, registered under the provisions of the Telangana Societies Registration Act 2001, with its administrative office at 3rd Floor, 36th Square, Plot No. 481, Road No, 36, Jubilee Hills, Hyderabad – 500034 (hereinafter called the "Objector". The main function of SICMA is to represent, promote &amp; protect the interests of its members.</p> <p>The members of the association are availing power from the licensees predominantly at 132/220 KV voltage and some of them at 33 KV voltage.</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><b>DELAY IN FILING THE RST PROPOSAL FOR FY 2022-23 2      DELAY IN FILING THE RST PROPOSAL FOR FY 2022-23</b></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>  | 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 |

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| <p>ii. The relevant extract is as follows:</p> <p><b>“6 FILING PROCEDURE</b></p> <p><b>6.I 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.”</b></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><b>Interlocutory Applications Filed by TS DISCOMS for Extension:</b></p> | <p>–</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> <li>• Pending information from ICAD department on Lift Irrigation (LI) schemes.</li> <li>• Pending finalisation of the annual accounts for the base year in the Board Meeting, whose values are considered for revisions in the cost estimates of ARR for Distribution Business.</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> </ul> |
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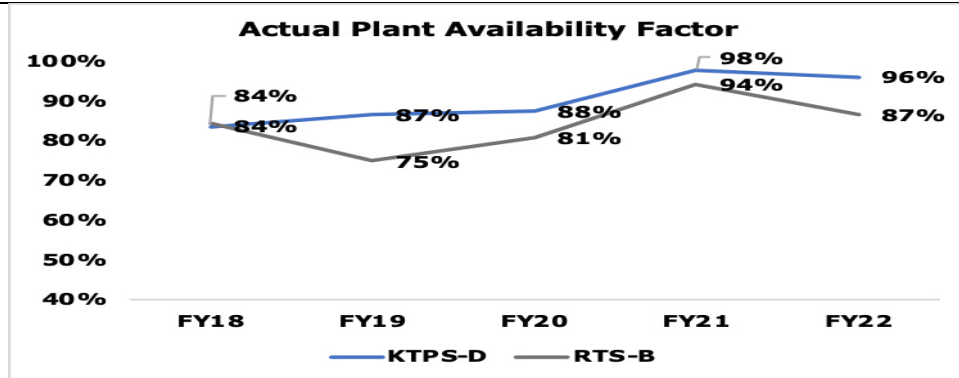
| FY  | O. P. Nos.                     | I.A.s filed by TS Discoms | Commission Approval Order |   |
|---|--------------------------------|---------------------------|---------------------------|---|
| <b>2019-20</b>  | 21 & 22 of 2017                | I.A. No. 8 of 2020        | Dated 20.03.2020          | <ul style="list-style-type: none"> <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>                                       |
| <b>2020-21</b>  | 21 & 22 of 2017                | I.A. No. 8 of 2020        | Dated 20.03.2021          |   |
| <b>2021-22</b>  | 21 & 22 of 2017                | I.A. No. 4 of 2021        | Dated 27.03.2021          |   |
| <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>                          |                                |                           |                           | <p>However, ARR for 2019-20, 2020-21, 2021-22 was submitted before TSERC on March 31, 2021, which was dismissed by the Hon'ble Commission due to non submission of tariff proposals by the TS Discoms.</p> <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> |
| 3   | <b>LACK OF TRUE-UP FILINGS</b> |                           |                           |   |
| <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>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. Additionally, TS Discoms have also filed the APR for 2020-21 on 31</p>   |

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| <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 quantity is to be considered:</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 is enclosed to this Regulation.</p> <p>xiii. It is submitted that the Annual Audited Accounts of TSPPDCL 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> | <p>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> |
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| 4               | <p><b>ABSENCE OF CONSOLIDATED WORKING EXCEL MODEL</b></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.</p> <p>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="306 941 1177 1377" data-label="Figure"> <p>The chart displays the Average Cost of Supply (ACoS) in Rs./kWh for three entities: TSSPDCL, TSNPDCL, and Telangana State. It compares the approved values from the FY19 RST Order with the values claimed by petitioners for FY 23. 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 that blue bars represent TSSPDCL, dark grey bars represent TSNPDCL, and light grey bars represent Telangana State.</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> | 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  |  |  |         |      |      |         |      |      |                 |      |      |   |

|   | <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 202223 in their Retail Tariff Petitions is 27 paise lesser than that claimed by Telangana Discoms.</p>  |             |           |         |       |                   |          |          |          |           |       |       |       |                   |          |          |          |                       |          |        |          |                           |          |          |           |                                   |           |           |           |  |        |       |        |   |       |       |       |                    |   |   |   |                 |           |           |           |                                     |           |           |           |                   |       |       |       |             |
|---|--|-------------|-----------|---------|-------|-------------------|----------|----------|----------|-----------|-------|-------|-------|-------------------|----------|----------|----------|-----------------------|----------|--------|----------|---------------------------|----------|----------|-----------|-----------------------------------|-----------|-----------|-----------|--|--------|-------|--------|---|-------|-------|-------|--------------------|---|---|---|-----------------|-----------|-----------|-----------|-------------------------------------|-----------|-----------|-----------|-------------------|-------|-------|-------|-------------|
| 6                                       | <p><b>AGGREGATE REVENUE REQUIREMENT (ARR) CLAIMED BY TELANGANA DISCOMS FOR FY 2022-23</b></p> <p>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:</p> <p><b>ARR CLAIMED BY PETITIONERS FOR FY 2022-23</b> (All figures in Rs. Crores)</p> <table border="1" data-bbox="306 789 1755 1406"> <thead> <tr> <th>Particulars</th> <th>TSSPDCL</th> <th>TSNPDCL</th> <th>TOTAL</th> </tr> </thead> <tbody> <tr> <td>Transmission Cost</td> <td>2,383.64</td> <td>1,005.43</td> <td>3,389.07</td> </tr> <tr> <td>SLDC Cost</td> <td>31.67</td> <td>13.23</td> <td>44.90</td> </tr> <tr> <td>Distribution Cost</td> <td>4,670.72</td> <td>3,601.25</td> <td>8,271.97</td> </tr> <tr> <td>PGCIL &amp; ULDC Expenses</td> <td>1,160.55</td> <td>484.45</td> <td>1,645.00</td> </tr> <tr> <td>Network and SLDC Cost (A)</td> <td>8,246.58</td> <td>5,104.36</td> <td>13,350.94</td> </tr> <tr> <td>Power Purchase / Procurement Cost</td> <td>26,411.20</td> <td>13,003.88</td> <td>39,415.08</td> </tr> <tr> <td>Interest on Consumer Security Deposits</td> <td>174.75</td> <td>49.09</td> <td>223.84</td> </tr> <tr> <td>Supply Margin in Retail Supply Business</td> <td>37.65</td> <td>26.04</td> <td>63.69</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>13,079.01</td> <td>39,702.61</td> </tr> <tr> <td>Aggregate Revenue Requirement (A+B)</td> <td>34,870.18</td> <td>18,183.37</td> <td>53,053.55</td> </tr> <tr> <td>Non-Tariff Income</td> <td>33.10</td> <td>29.41</td> <td>62.51</td> </tr> </tbody> </table> | 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 | No Comments |
| 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     |         |       |                   |          |          |          |           |       |       |       |                   |          |          |          |                       |          |        |          |                           |          |          |           |                                   |           |           |           |  |        |       |        |   |       |       |       |                    |   |   |   |                 |           |           |           |                                     |           |           |           |                   |       |       |       |             |

|   |   |  |                   |                  |                  |                      |  |  |  |   |                  |                  |                  |   |                  |                  |                   |   |                 |                 |                 |  |                  |                  |                   |  |
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|   | <table border="1"> <tr> <td><b>Net Revenue Requirement</b></td> <td><b>34,837.08</b></td> <td><b>18,153.96</b></td> <td><b>52,991.04</b></td> </tr> <tr> <td><b>Total Revenue</b></td> <td></td> <td></td> <td></td> </tr> <tr> <td><b>Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)</b></td> <td><b>25,708.48</b></td> <td><b>10,702.76</b></td> <td><b>36,411.24</b></td> </tr> <tr> <td><b>Revenue Deficit(-)/Surplus(+) at Current Tariffs</b></td> <td><b>-9,128.60</b></td> <td><b>-7,451.20</b></td> <td><b>-16,579.80</b></td> </tr> <tr> <td><b>Government Subsidy u/s 65 of the Electricity Act, 2003</b></td> <td><b>1,397.50</b></td> <td><b>4,254.15</b></td> <td><b>5,651.65</b></td> </tr> <tr> <td><b>Net gap – Deficit(-)/Surplus(+)</b></td> <td><b>-7,731.10</b></td> <td><b>-3,197.05</b></td> <td><b>-10,928.15</b></td> </tr> </table> <p>xx. The Objections in respect of the ARR projected by the Petitioners for FY 2022-23 are summarised below:</p> | <b>Net Revenue Requirement</b>   | <b>34,837.08</b>  | <b>18,153.96</b> | <b>52,991.04</b> | <b>Total Revenue</b> |  |  |  | <b>Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)</b> | <b>25,708.48</b> | <b>10,702.76</b> | <b>36,411.24</b> | <b>Revenue Deficit(-)/Surplus(+) at Current Tariffs</b> | <b>-9,128.60</b> | <b>-7,451.20</b> | <b>-16,579.80</b> | <b>Government Subsidy u/s 65 of the Electricity Act, 2003</b> | <b>1,397.50</b> | <b>4,254.15</b> | <b>5,651.65</b> | <b>Net gap – Deficit(-)/Surplus(+)</b> | <b>-7,731.10</b> | <b>-3,197.05</b> | <b>-10,928.15</b> |  |
| <b>Net Revenue Requirement</b>  | <b>34,837.08</b>  | <b>18,153.96</b>   | <b>52,991.04</b>  |                  |                  |                      |  |  |  |   |                  |                  |                  |   |                  |                  |                   |   |                 |                 |                 |  |                  |                  |                   |  |
| <b>Total Revenue</b>  |   |  |                   |                  |                  |                      |  |  |  |   |                  |                  |                  |   |                  |                  |                   |   |                 |                 |                 |  |                  |                  |                   |  |
| <b>Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)</b> | <b>25,708.48</b>  | <b>10,702.76</b>   | <b>36,411.24</b>  |                  |                  |                      |  |  |  |   |                  |                  |                  |   |                  |                  |                   |   |                 |                 |                 |  |                  |                  |                   |  |
| <b>Revenue Deficit(-)/Surplus(+) at Current Tariffs</b>   | <b>-9,128.60</b>  | <b>-7,451.20</b>   | <b>-16,579.80</b> |                  |                  |                      |  |  |  |   |                  |                  |                  |   |                  |                  |                   |   |                 |                 |                 |  |                  |                  |                   |  |
| <b>Government Subsidy u/s 65 of the Electricity Act, 2003</b>   | <b>1,397.50</b>   | <b>4,254.15</b>  | <b>5,651.65</b>   |                  |                  |                      |  |  |  |   |                  |                  |                  |   |                  |                  |                   |   |                 |                 |                 |  |                  |                  |                   |  |
| <b>Net gap – Deficit(-)/Surplus(+)</b>  | <b>-7,731.10</b>  | <b>-3,197.05</b>   | <b>-10,928.15</b> |                  |                  |                      |  |  |  |   |                  |                  |                  |   |                  |                  |                   |   |                 |                 |                 |  |                  |                  |                   |  |
| 7   | <p><b>POWER PURCHASE COST</b></p> <p><b>A. TSGENCO Thermal Power Stations:</b></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>  | <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</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.

xxiii. TSSPDCL in the Sheet titled PP Assumptions in Annexure XI to its Reply to Additional Information on Aggregate Revenue Requirement & Tariff Proposals for FY 2022-23, has submitted that it has considered Fixed Cost as per Apr-Aug (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.

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:

**“10. Determination of tariff**

(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:

cost, Interest on loan, Return on equity, O&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. TSDISCOMs will admit the Fixed Charges as per the approval of TSERC only.

All the Power purchase Agreements are being entered with Generators/Developers by TSDISCOMs after taking Hon'ble TSERC approval issued after Public hearings.

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.

(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.

From, October 2021 onwards, the Coal prices in India have increased, the same has been considered in ARR Filings.

In respect of BTPS, the period of construction of plant, FGD cost, Capacity of



Provided that the billing for energy charges w.e.f. 1.4.2019 shall be as per the operational norms specified in these regulations.”

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.

the unit, GST and Covid impact etc led to increase in the cost of the plant.

Other costs are inclusive of Cost of water, IT initiatives, Hydel secondary charges, Thermal incentives and Medical & Welfare Expenses etc.

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.

Further, 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

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|    | <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>availability and FC, VC projections for FY 2022-23, in the above sections.</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>  |
| B) | <p><b>B. TSGENCO Hydel Power Stations:</b></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><b><u>Reply to xxx &amp; xxxii</u></b></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><b><u>Reply to xxxi</u></b></p> <p>Fixed charges are payable to Hydel Stations irrespective of Energy.</p> |

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|    |  | <p>However, TSDISCOMs will pay Fixed Charges to TSGENCO as per TSERC Order only.</p> <p><b><u>Reply to xxxiii &amp; xxxiv</u></b><br/> 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> <p>TS Discoms would request the Hon'ble Commission to consider the projections shared by Discoms, considering the justifications shared on the same.</p>   |
| C) | <p><b>Central Generation Stations:</b></p> <p><b>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:</b></p> <p><b>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)</b></p> <p><b>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:</b></p> | <p><b><u>Reply to xxxv, xxxvi &amp; xxxvii</u></b><br/> 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</p> |

**“10. Determination of tariff**

**(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:**

**Provided that the billing for energy charges w.e.f. 1.4.2019 shall be as per the operational norms specified in these regulations.”**

**xxxvii. It can be observed from the following tables that the Petitioners have deviated from this approach:**

| <b>Station</b>                | <b>Fixed Cost approved in Tariff Order (INR Crore)</b> | <b>Source</b>  |
|-------------------------------|--|--|
| <b>NTPC (SR) - I &amp; II</b> | <b>1,061.23</b>  | <b>Page No. 36 of CERC Order dated 24.01.2017 in Petition No. 292/GT/2014</b>              |
| <b>NTPC (SR) Stage III</b>    | <b>290.82</b>  | <b>Page No. 41 of CERC Order dated 17.11.2021 in Petition No. Petition No: 444/GT/2020</b> |
| <b>Talcher Stage 2</b>        | <b>1,007.23</b>  | <b>Page No. 44 of CERC Order dated 16.02.2017 in Petition No. 293/GT/2014</b>              |
| <b>NTPC Simhadri Stage I</b>  | <b>661.99</b>  | <b>Page No. 25 of CERC Order dated 27.06.2016 in Petition No. 270/GT/2014</b>              |

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

projections.

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.

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

| 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:<br>if C>=D,<br>F=A*B if<br>C<D,<br>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 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.

xxxix. The Objector has not considered any power purchase from Telangana STPP (Phase I) and has

**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.

Accordingly, TSDISCOMs entered PPA for 2X800 MW (Phase-1)

3499.63 MU has been arrived considering CODs of unit -1&2 as 30th September 2022 & 31st December 2022 respectively.

NTPC has not yet filed Petition at CERC for determination of tariff.

**Reply to xxxix, xl**

TS Discoms have gone through the

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| <p>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><b>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.</b></p> | <p>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 abovementioned 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 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</p> |
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|    |  | <p>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><b>Other Stations:</b></p> <p><b>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.</b></p> <p><b>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.</b></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><b>Short Term Power Purchase and D-D Sales:</b></p> <p><b>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.</b></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</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>discovered in the Exchange for respective Time Blocks.</p> <p>Efforts are also being made by TSDISCOMs for Banking arrangements with other State Utilities.</p>  |                   |                       |                   |                   |                       |                   |                   |  |  |             |       |  |  |         |  |  |         |  |  |                       |  |  |                       |  |  |                       |  |  |       |                   |                   |       |                   |                   |       |                   |                   |                 |           |           |      |           |          |      |          |          |      |               |          |          |      |          |        |      |          |        |      |              |           |          |      |           |          |      |          |          |      |        |   |   |   |   |   |   |   |   |   |  |
|--|--|---|-------------------|-----------------------|-------------------|-------------------|-----------------------|-------------------|-------------------|--|--|-------------|-------|--|--|---------|--|--|---------|--|--|-----------------------|--|--|-----------------------|--|--|-----------------------|--|--|-------|-------------------|-------------------|-------|-------------------|-------------------|-------|-------------------|-------------------|-----------------|-----------|-----------|------|-----------|----------|------|----------|----------|------|---------------|----------|----------|------|----------|--------|------|----------|--------|------|--------------|-----------|----------|------|-----------|----------|------|----------|----------|------|--------|---|---|---|---|---|---|---|---|---|--|
| F)   | <p><b>Surplus Power:</b></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="306 995 1760 1427"> <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</p> |
| 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   | -  | -   | -                 | -                     | -                 | -                 | -                     | -                 | -                 |  |  |             |       |  |  |         |  |  |         |  |  |                       |  |  |                       |  |  |                       |  |  |       |                   |                   |       |                   |                   |       |                   |                   |                 |           |           |      |           |          |      |          |          |      |               |          |          |      |          |        |      |          |        |      |              |           |          |      |           |          |      |          |          |      |        |   |   |   |   |   |   |   |   |   |  |



|  |                  |                  |             |                  |                  |             |                  |                  |             |
|--|------------------|------------------|-------------|------------------|------------------|-------------|------------------|------------------|-------------|
| 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<br>(Thermal<br>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<br>purchase   |                  |                  | -           | -4,074.07        | -1,393.26        | 3.42        | 4,074.07         | 1,393.26         | 3.42        |
| Short-term<br>power<br>purchase  | 2,392.65         | 920.39           | 3.85        | 1,688.01         | 649.33           | 3.85        | 704.64           | 271.05           | 3.85        |
| Additional<br>Short Term<br>Purchase to<br>offset<br>Telangana<br>STPP-1 |                  |                  |             |                  |                  |             |                  |                  |             |
| PTC  | 1,368.84         | 587.23           | 4.29        | 965.72           | 414.29           | 4.29        | 403.12           | 172.94           | 4.29        |
| Interest on<br>pension<br>bonds  |                  | 1,394.83         | -           |                  | 984.05           | -           |                  | 410.78           | -           |
| Other Costs  |                  | -                | -           |                  | -                | -           |                  | -                | -           |
| <b>Total</b>   | <b>84,221.77</b> | <b>39,415.08</b> | <b>4.68</b> | <b>55,299.08</b> | <b>26,411.20</b> | <b>4.78</b> | <b>28,922.69</b> | <b>13,003.88</b> | <b>4.50</b> |

2022-23, for the respective 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   |                   |                   | TSNPDCL  |                   |                   |
|  | 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   | -         | -                 | -                 | -         | -                 | -                 | -        | -                 | -                 |

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

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

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

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| 8 | <p><b>DISTRIBUTION COST</b><br/> xlviii. The following directives were given in the Distribution MYT order dt. 29.04.2020 by Hon'ble Commission:</p> <p><b>“2. Annual Performance Review</b><br/> 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><b>3. True-up for 1st, 2nd and 3rd Control Periods</b><br/> 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.</p> <p>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<br/> The Commission directs the DISCOMs to submit the details of long-term loans viz., loans availed</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</p> |
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|  |  |
|--|--|
| <p>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><b>4. Computation of depreciation in accordance with CERC (Terms and Conditions of Tariff) Regulations, 2019</b><br/> 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><b>5. Capital Investments</b><br/> 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. 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>l. In light of above, the Objector submits that the Hon’ble Commission may reprimand the</li> </ol> | <p>scheme along with APR filing for FY 2019-20.</p> <p>The DISCOM submitted the depreciation computed based on CERC Regulations in Annual Performance Review filings.</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 doesnot arises.</p> |
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|   |  |   |
|---|--|---|
|   | <p><b>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.</b></p> <p><b>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 ‘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:</b></p> <p><b>“C) The Commission’s views:</b></p> <p><b>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.</b></p> <p><b>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.”</b></p> <p><b>(Emphasis supplied)</b></p> <p><b>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:</b></p> <p><b>“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.”</b></p> <p><b>(Emphasis supplied)</b></p> <p><b>The relevant Orders are attached herewith as Annexure-G.</b></p> |   |
| 9 | <p><b>PGCIL &amp; ULDC CHARGES</b></p> <p><b>liii. As per the PGCIL charges computation provided by TSSPDCL &amp; TSNPDCL in their</b></p>   | <p><b><u>Reply to liii &amp; lv</u></b></p> |

Annexures – IX & 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 & 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 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

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.

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.

| Particulars  |         | Petitioner<br>as per<br>Annexure<br>IX & XVIII | Objector<br>Assessment as per<br>SRPC RTDA<br>Accounts |
|--|---------|--|--|
|  | Units   | Value  | Jan-22   |
| 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<br>Submission as per<br>Annexure IX &<br>XVIII | Objector's Assessment as per<br>SRPC RTDA Accounts |
|---|---|--|
| Particulars   | Value   | Value  |
| PGCIL (POC) charges for FY 23<br>(C)<br>(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   |
| TSNPDCCL 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                       |         |                       |  |         |  |       |  |                   |         |                       |         |                       |         |                       |             |         |         |         |         |         |         |  |  |  |  |  |  |  |   |
|                   | <b>Total PGCIL charges</b>   | <b>1,645.00</b>           | <b>1,506.67</b>                            | <b>138.33</b>               |         |                       |  |         |  |       |  |                   |         |                       |         |                       |         |                       |             |         |         |         |         |         |         |  |  |  |  |  |  |  |   |
|                   | <p>The relevant extract of the SRPC RTDA Accounts for January, 2022, are attached herewith as Annexure-H.</p> <p>iv. 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 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 align="center"><b>Objector Assessment of Non-Tariff Income for FY 2022-23</b><br/>(All Figures in Rs. Crores)</p> <table border="1"> <thead> <tr> <th></th> <th colspan="2">TSSPDCL</th> <th colspan="2">TSNPDCL</th> <th colspan="2">Total</th> </tr> <tr> <th>Non-Tariff Income</th> <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></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> |                           |  |                             |         | TSSPDCL               |  | TSNPDCL |  | Total |  | Non-Tariff Income | 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 |  |  |  |  |  |  |  | <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. 5.2 of Chapter - 5 at page no. 63- 65 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> |
|                   | TSSPDCL  |                           | TSNPDCL                                    |                             | Total   |                       |  |         |  |       |  |                   |         |                       |         |                       |         |                       |             |         |         |         |         |         |         |  |  |  |  |  |  |  |   |
| Non-Tariff Income | 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><b>lviii. It is respectfully submitted that the Hon’ble Commission may align the NonTariff incomes strictly in line with the audited accounts and reduce it from the ARR being approved.</b></p>   |            |                     |            |         |         |         |    |         |  |         |  |                     |            |                     |            |         |         |          |         |      |         |         |          |         |      |  |      |         |         |         |         |         |
| 11      | <p><b>SALES PROJECTIONS</b></p> <p><b>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, 2year, 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.</b></p> <p><b>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.</b></p> <table border="1"> <thead> <tr> <th rowspan="2">FY</th> <th colspan="2">TSSPDCL</th> <th colspan="2">TSNPDCL</th> </tr> <tr> <th>Connected Load (HP)</th> <th>Sales (MU)</th> <th>Connected Load (HP)</th> <th>Sales (MU)</th> </tr> </thead> <tbody> <tr> <td>2018-19</td> <td>5522130</td> <td>12637.78</td> <td>5733821</td> <td>8200</td> </tr> <tr> <td>2019-20</td> <td>5668800</td> <td>10818.39</td> <td>5906250</td> <td>7138</td> </tr> </tbody> </table> |            |                     |            |         |         |         | 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 | <p><b>lix</b></p> <p>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.</p> <p>Following table shows the CAGR for the past 5 years for FY 2022-23 for LT Dom. category</p> <table border="1"> <tr> <td>FY23</td> <td>1Y CAGR</td> <td>2Y CAGR</td> <td>3Y CAGR</td> <td>4Y CAGR</td> <td>5Y CAGR</td> </tr> </table> | FY23 | 1Y CAGR | 2Y CAGR | 3Y CAGR | 4Y CAGR | 5Y CAGR |
| 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       |         |         |         |    |         |  |         |  |                     |            |                     |            |         |         |          |         |      |         |         |          |         |      |  |      |         |         |         |         |         |
| FY23    | 1Y CAGR   | 2Y CAGR    | 3Y CAGR             | 4Y CAGR    | 5Y CAGR |         |         |    |         |  |         |  |                     |            |                     |            |         |         |          |         |      |         |         |          |         |      |  |      |         |         |         |         |         |

|                |                |                 |                |             |
|----------------|----------------|-----------------|----------------|-------------|
| <b>2020-21</b> | <b>5898650</b> | <b>11744.84</b> | <b>6095822</b> | <b>7903</b> |
| <b>2021-22</b> | <b>6198700</b> | <b>11647.65</b> | <b>6416837</b> | <b>7837</b> |
| <b>2022-23</b> | <b>6448700</b> | <b>11181.74</b> | <b>6737852</b> | <b>7524</b> |

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

|         |       |       |       |       |       |
|---------|-------|-------|-------|-------|-------|
| 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.

**lx.**  
 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

|    |   |   |
|----|---|---|
|    |   | <p>the basis for extrapolation of the agricultural consumption.<br/>SPDCL has also calculated the agricultural sales using ISI methodology.</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> <p>Thus, TS Discoms have considered a past reference i.e. CAGR while projecting sales for LT Agriculture</p> |
| 12 | <p><b>GOVERNMENT OF TELANGANA SUBSIDY</b></p> <p><b>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:</b></p> | <p><b><u>Reply to lxii to lxvi</u></b></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</p>  |

6.9.5 The details of subsidy requirement computed by the Commission is as shown in the Table below:

**Table 6.6: Subsidy for FY 2018-19 (Rs. crore)**

| 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>    | -              | 16.39          | 16.39          |
| 4.2    | <i>LT V: Agriculture</i> | -              | 272.44         | 272.44         |
| 3+4    | <b>Total</b>             | <b>1397.50</b> | <b>4542.96</b> | <b>5940.47</b> |

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:

“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 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

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.

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.

**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 noncommitment 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 |                  |                  | Shortfal<br>I   |                 |                 |
|--------------|-------------------------------|------------------|------------------|--|------------------|------------------|-----------------|-----------------|-----------------|
|              | TSSPDCL                       | TSNPDC           | Total            | TSSPDCL  | TSNPDC           | Total            | TSSPDCL         | TSNPDC          | Total           |
| <b>FY19</b>  | 1,397.50                      | 4,254.15         | <b>5,651.65</b>  | 1,172.56   | 3,569.40         | <b>4,741.96</b>  | <b>224.94</b>   | <b>684.75</b>   | <b>909.69</b>   |
| <b>FY20</b>  | 1,397.50                      | 4,254.15         | <b>5,651.65</b>  | 1,172.00   | 3,569.40         | <b>4,741.40</b>  | <b>225.50</b>   | <b>684.75</b>   | <b>910.25</b>   |
| <b>FY21</b>  | 1,397.50                      | 4,254.15         | <b>5,651.65</b>  | 1,397.50   | 4,254.15         | <b>5,651.65</b>  | -               | -               | -               |
| <b>FY22*</b> | 1,397.50                      | 4,254.15         | <b>5,651.65</b>  | -  | -                | -                | <b>1,397.50</b> | <b>4,254.15</b> | <b>5,651.65</b> |
| <b>Total</b> | <b>5,590.00</b>               | <b>17,016.60</b> | <b>22,606.60</b> | <b>3,742.06</b>                                    | <b>11,392.95</b> | <b>15,135.01</b> | <b>1,847.94</b> | <b>5,623.65</b> | <b>7,471.59</b> |

**\*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:**

**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

| 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 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.**

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 –

- 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

**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.

lxix. 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.

**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 subsidised

lxx. TS Discoms would like to state that the last tariff hike approved by the the Hon'ble commission was

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             | As 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%  |
| As per TSNPDCL Claim |  |  |  |
| HT I -11 kV          | 17%  | 38%  | 64%  |
| HT I – 33kV          | 10%  | 31%  | 56%  |
| HT I – 132 kV        | -14%   | 5%   | 26%  |

**lxxi.** 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.

**lxxii.** 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.

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 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.

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



|    |  |  |
|----|--|--|
|    |  | <p>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><b>lxxiii. 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.</b></p> <p><b>lxxiv. 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.</b></p> <p><b>lxxv. 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.</b></p> <p><b>lxxvi. 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) for H1 and H2 for TSSPDCL and TSNPDCL respectively. The same are described in brief as follows:</b></p> | <p><b>lxxv.</b><br/>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</p> |

|   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• <b>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.</b></li> <li>• <b>Inter-State Transmission Charges and SLDC Charges and 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.</b></li> </ul> <p><b>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.</b></p> | <p>methodology as approved by the commission in its order OP No.23 of 2020 for determining the Additional Surcharge</p> <p><b>lxxvi.</b><br/>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:</p> <p>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 <b>intra &amp; inter state transmission charges</b>)</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 inter state generators thereby utilizing the intra and inter state 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 <b>Distribution</b></p> |
|---|---|

**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 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 **SUMMARY OF OBJECTOR'S ASSESSMENT OF ALLOWABLE ARR FOR FY 2022-23**  
**lxxvii. The ARR as per Objector's assessment vs Petitioner's submission are provided below:**  
**Summary of ARR for TSSPDCL for FY 2022-23**  
**(All figures in Rs. Crores)**

| 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     |

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.

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.

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 accordingly request the Hon'ble Commission to approve the same after due regulatory proceedings.

|   |                  |                  |                  |                  |
|---|------------------|------------------|------------------|------------------|
| <b>Aggregate Revenue Requirement (A+B)</b>  | <b>34,870.18</b> | <b>31,436.42</b> | <b>3,433.76</b>  |                  |
| <b>Non-Tariff Income</b>  | <b>33.10</b>     | <b>810.02</b>    | <b>-776.92</b>   |                  |
| <b>Net Revenue Requirement</b>  | <b>34,837.08</b> | <b>30,626.40</b> | <b>4,210.68</b>  |                  |
| <b>Sales (MU)</b>   | <b>48,822.80</b> | <b>48,822.80</b> | <b>-</b>         |                  |
| <b>ACoS (Rs./kWh)</b>   | <b>7.14</b>      | <b>6.27</b>      | <b>0.86</b>      |                  |
| <b>Total Revenue</b>  |                  |                  |                  |                  |
| <b>Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)</b> | <b>25,708.48</b> | <b>25,708.48</b> | <b>-</b>         |                  |
| <b>Revenue Deficit(-)/Surplus(+) at Current Tariffs</b>   | <b>-9,128.60</b> | <b>-4,917.92</b> | <b>-4,210.68</b> |                  |
| <b>Government Subsidy u/s 65 of the Electricity Act, 2003</b>   | <b>1,397.50</b>  | <b>8,523.91</b>  | <b>-7,126.41</b> |                  |
| <b>Net gap – Deficit(-)/Surplus(+)</b>  | <b>-7,731.10</b> | <b>3,605.99</b>  | <b>-</b>         | <b>11,337.09</b> |
| <b>Revenue changed through proposed tariff (incl. Cross Subsidy Surcharge &amp; Additional Surcharge)</b>           | <b>5,044.27</b>  | <b>-</b>         | <b>5,044.27</b>  |                  |
| <b>Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2018-19</b>                           | <b>-</b>         | <b>224.94</b>    | <b>-224.94</b>   |                  |
| <b>Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2019-20</b>                           | <b>-</b>         | <b>225.50</b>    | <b>-225.50</b>   |                  |
| <b>Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2020-21</b>                           | <b>-</b>         | <b>-</b>         | <b>-</b>         |                  |
| <b>Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2021-22</b>                           | <b>-</b>         | <b>1,397.50</b>  | <b>-1,397.50</b> |                  |
| <b>Net gap – Deficit(-)/Surplus(+) after Tariff Hike</b>  | <b>-2,686.83</b> | <b>5,453.93</b>  | <b>-8,140.76</b> |                  |
| <b>Summary of ARR for TSNPDCL for FY 2022-23</b>  |                  |                  |                  |                  |

| <b>Particulars</b>  | <b>Petitioner's Claim</b> | <b>Objector's Assessment</b> | <b>Disallowance</b> |
|---|---------------------------|------------------------------|---------------------|
| <b>Transmission Cost</b>  | <b>1,005.43</b>           | <b>1,005.43</b>              | <b>-</b>            |
| <b>SLDC Cost</b>  | <b>13.23</b>              | <b>13.23</b>                 | <b>-</b>            |
| <b>Distribution Cost</b>  | <b>3,601.25</b>           | <b>2,520.88</b>              | <b>1,080.38</b>     |
| <b>PGCIL &amp; ULDC Expenses</b>  | <b>484.45</b>             | <b>443.72</b>                | <b>40.73</b>        |
| <b>Network and SLDC Cost (A)</b>  | <b>5,104.36</b>           | <b>3,983.25</b>              | <b>1,121.11</b>     |
| <b>Power Purchase / Procurement Cost</b>  | <b>13,003.88</b>          | <b>11,925.95</b>             | <b>1,077.93</b>     |
| <b>Interest on Consumer Security Deposits</b>   | <b>49.09</b>              | <b>49.09</b>                 | <b>-</b>            |
| <b>Supply Margin in Retail Supply Business</b>  | <b>26.04</b>              | <b>26.04</b>                 | <b>-</b>            |
| <b>Other Costs if any</b>   | <b>-</b>                  | <b>-</b>                     | <b>-</b>            |
| <b>Supply Cost (B)</b>  | <b>13,079.01</b>          | <b>12,001.08</b>             | <b>1,077.93</b>     |
| <b>Aggregate Revenue Requirement (A+B)</b>  | <b>18,183.37</b>          | <b>15,984.33</b>             | <b>2,199.04</b>     |
| <b>Non-Tariff Income</b>  | <b>29.41</b>              | <b>567.18</b>                | <b>-537.77</b>      |
| <b>Net Revenue Requirement</b>  | <b>18,153.96</b>          | <b>15,417.15</b>             | <b>2,736.81</b>     |
| <b>Sales (MU)</b>   | <b>25,904.66</b>          | <b>25,904.66</b>             | <b>-</b>            |
| <b>ACoS (Rs./kWh)</b>   | <b>7.01</b>               | <b>5.95</b>                  | <b>1.06</b>         |
| <b>Total Revenue</b>  |                           |                              |                     |
| <b>Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)</b> | <b>10,702.76</b>          | <b>10,702.76</b>             | <b>-</b>            |
| <b>Revenue Deficit(-)/Surplus(+) at Current Tariffs</b>   | <b>-7,451.20</b>          | <b>-4,714.39</b>             | <b>-2,736.81</b>    |
| <b>Government Subsidy u/s 65 of the Electricity Act, 2003</b>   | <b>4,254.15</b>           | <b>5,319.30</b>              | <b>-1,065.15</b>    |
| <b>Net gap – Deficit(-)/Surplus(+)</b>  | <b>-3,197.05</b>          | <b>604.91</b>                | <b>-3,801.96</b>    |

|   |                  |                 |                  |
|---|------------------|-----------------|------------------|
| <b>Revenue changed through proposed tariff (incl. Cross Subsidy Surcharge &amp; Additional Surcharge)</b> | <b>1,786.63</b>  | <b>-</b>        | <b>1,786.63</b>  |
| <b>Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2018-19</b>                 | <b>-</b>         | <b>684.75</b>   | <b>-684.75</b>   |
| <b>Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2019-20</b>                 | <b>-</b>         | <b>684.75</b>   | <b>-684.75</b>   |
| <b>Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2020-21</b>                 | <b>-</b>         | <b>-</b>        | <b>-</b>         |
| <b>Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2021-22</b>                 | <b>-</b>         | <b>4,254.15</b> | <b>-4,254.15</b> |
| <b>Net gap – Deficit(-)/Surplus(+) after Tariff Hike</b>  | <b>-1,410.42</b> | <b>6,228.56</b> | <b>-7,638.98</b> |

**Summary of ARR for Telangana State for FY 2022-23**

(All figures in Rs. Crores)

| <b>Particulars</b>                             | <b>Petitioner's Claim</b> | <b>Objector's Assessment</b> | <b>Disallowance</b> |
|--|---------------------------|------------------------------|---------------------|
| <b>Transmission Cost</b>                       | <b>3,389.07</b>           | <b>3,389.07</b>              | <b>-</b>            |
| <b>SLDC Cost</b>                               | <b>44.90</b>              | <b>44.90</b>                 | <b>-</b>            |
| <b>Distribution Cost</b>                       | <b>8,271.97</b>           | <b>5,790.38</b>              | <b>2,481.59</b>     |
| <b>PGCIL &amp; ULDC Expenses</b>               | <b>1,645.00</b>           | <b>1,506.67</b>              | <b>138.33</b>       |
| <b>Network and SLDC Cost (A)</b>               | <b>13,350.94</b>          | <b>10,731.02</b>             | <b>2,619.92</b>     |
| <b>Power Purchase / Procurement Cost</b>       | <b>39,415.08</b>          | <b>36,402.20</b>             | <b>3,012.88</b>     |
| <b>Interest on Consumer Security Deposits</b>  | <b>223.84</b>             |                              | <b>-</b>            |
| <b>Supply Margin in Retail Supply Business</b> | <b>63.69</b>              |                              | <b>-</b>            |
| <b>Other Costs if any</b>                      | <b>-</b>                  |                              | <b>-</b>            |
| <b>Supply Cost (B)</b>                         | <b>39,702.61</b>          | <b>36,402.20</b>             | <b>3,012.88</b>     |

|   |                   |                  |                   |
|---|-------------------|------------------|-------------------|
| <b>Aggregate Revenue Requirement (A+B)</b>  | <b>53,053.55</b>  | <b>47,133.22</b> | <b>5,632.80</b>   |
| <b>Non-Tariff Income</b>  | <b>62.51</b>      | <b>1,377.20</b>  | <b>-1,314.69</b>  |
| <b>Net Revenue Requirement</b>  | <b>52,991.04</b>  | <b>45,756.02</b> | <b>6,947.49</b>   |
| <b>Sales (MU)</b>   | <b>74,727.46</b>  | <b>74,727.46</b> |                   |
| <b>ACoS (Rs./kWh)</b>   | <b>7.09</b>       | <b>6.12</b>      | <b>0.97</b>       |
| <b>Total Revenue</b>  |                   |                  |                   |
| <b>Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)</b>   | <b>36,411.24</b>  | <b>36,411.24</b> | <b>-</b>          |
| <b>Revenue Deficit(-)/Surplus(+) at Current Tariffs</b>   | <b>-16,579.80</b> | <b>-9,632.32</b> | <b>-6,947.49</b>  |
| <b>Government Subsidy u/s 65 of the Electricity Act, 2003</b>   | <b>5,651.65</b>   | <b>13,843.21</b> | <b>-8,191.56</b>  |
| <b>Net gap – Deficit(-)/Surplus(+)</b>  | <b>-10,928.15</b> | <b>4,210.89</b>  | <b>-15,139.05</b> |
| <b>Revenue changed through proposed tariff (incl. Cross Subsidy Surcharge &amp; Additional Surcharge)</b>   | <b>6,830.90</b>   | <b>-</b>         | <b>6,830.90</b>   |
| <b>Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2018-19</b>   | <b>-</b>          | <b>909.69</b>    | <b>-909.69</b>    |
| <b>Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2019-20</b>   | <b>-</b>          | <b>910.25</b>    | <b>-910.25</b>    |
| <b>Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2020-21</b>   | <b>-</b>          | <b>-</b>         | <b>-</b>          |
| <b>Shortfall in Government Subsidy u/s 65 of the Electricity Act, 2003 for FY 2021-22</b>   | <b>-</b>          | <b>5,651.65</b>  | <b>-5,651.65</b>  |
| <b>Net gap – Deficit(-)/Surplus(+) after Tariff Hike</b>  | <b>-4,097.25</b>  | <b>11,682.48</b> | <b>-15,779.74</b> |
| <b>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</b> |                   |                  |                   |

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|    | <p>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><b>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.,</b></p> <p><b>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.</b></p> <p><b>lxxx. Furthermore, the Petitioners have failed to provide the load demand curves, scenario analysis, etc. for the proposed ToD Tariff mechanism.</b></p> <p><b>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.</b></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 operated during the peak hours which are not feasible being operated during off peak hours.</p> |



Keeping demand side management & 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.

**17 PROPOSED CROSS SUBSIDY SURCHARGE**

**lxxxii. The Petitioners have proposed the following Cross Subsidy Surcharge for FY 2022-23:**

| 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    |

**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:**

(All figures in Rs./kWh)

| Discom  | ACoS as per Objector's Assessment | Max Tariff as per NTP 2016 (±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**

As per the Section 8.3 of the Tariff Policy 2016, "the Appropriate Commission would notify a roadmap such that tariffs are brought within ±20% 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.

Further the TS Discoms while determining the CSS for all categories have taken minimum of

- 20% of category ABR and,
- 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.

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|    | <p>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:</p> <p><b>“8.3 Tariff design: Linkage of tariffs to cost of service</b></p> <p>...</p> <p><b>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 <math>\pm 20\%</math> 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.</b></p> <p>...</p> <p><b>Surcharge formula:</b></p> <p>...</p> <p><b>Provided that the surcharge shall not exceed 20% of the tariff applicable to the category of the consumers seeking open access.”</b></p> <p><b>(Emphasis supplied)</b></p>   |  |
| 18 | <p><b>PARALLEL OPERATION CHARGES/GRID SUPPORT CHARGES</b></p> <p><b>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:</b></p> <p><b>“Proposal for Determination of Grid Support Charges for Telangana – FY 2022-23</b></p> <p><b>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</b></p> <p><b>08.02.2002 and subsequently upheld by Supreme Court via judgment dated 29.11.2019 as below</b></p> <p><b>“Persons operating Captive Power Plants (CPPs) in parallel with T.S. Grid have to pay ‘Grid</b></p> | <p><b>lxxxviii.</b></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</p> |

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| <p><b>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.”</b></p> <p><b>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.</b></p> <p><b>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.</b></p> <p><b>lxxxviii. 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.</b></p> <p><b>lxxxix. 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.</b></p> <p><b>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</b></p> | <p>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. 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:<br/> Captive Capacity = 100 MVA = 100,000 kVA .....[a]<br/> CMD with Distribution licensee = 90 MVA = 90,000 kVA.....[b]</p> <p>Differential capacity = [a-b] = 10 MVA = 10,000 kVA<br/> ....[c]<br/> GSC (Rs. Cr.) = c * 50% of Demand charges</p> |
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|    | <p>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 independent study is conducted and results discussed with stakeholders through a consultation process, the GSC may not be imposed.</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<br/> Captive Capacity = 100 MVA = 100,000 kVA<br/> GSC (Rs. Cr.) = <math>25 * 100000 / 10^7</math><br/> = 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> |
| 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> <p>➤ More no. of skilled officials are involved at each stage of processing of open access facility</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</p>   |

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.

➤ 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&M cost to the DISCOM.

➤ 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&T, Secure and Elster to convert raw dump data from meters for processing of deviation settlements and for analyzing of meters, etc.,

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&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 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

services in the form of O&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.

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.<br>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.  |
| 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 | 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. |

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'.

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

20 **PRAYERS**  
**The Objector most respectfully prays that this Hon'ble Commission may be pleased to:**  
**A. Consider the above Objection Statement filed by the Objector;**  
**B. Disallow the power purchase cost as per the Objector's Assessment and in cases where the**

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| <p>purchase has been projected at exorbitantly high price not relatable to the incumbent market situations;</p> <p><b>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;</b></p> <p><b>D. Allow PGCIL and UDLC Charges as per Objector’s Assessment;</b></p> <p><b>E. Align the Non-Tariff incomes strictly in line with the Audited Accounts and reduce it from the ARR being approved;</b></p> <p><b>F. Adjust the subsidy shortfall from the Govt. of Telangana as per Objector’s Assessment for FY 2018-19 to FY 2021-22;</b></p> <p><b>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 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;</b></p> <p><b>H. Approve the ARR by considering the total subsidy as prayed and assessed by the Objector in the detailed Objections Statement;</b></p> <p><b>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;</b></p> <p><b>J. Disallow the proposed revenue from proposed tariffs and proposed additional surcharge as claimed by the Petitioner;</b></p> <p><b>K. It is requested that the Hon’ble Commission may disallow any proposed modification in TOD;</b></p> <p><b>L. Allow Cross Subsidy Surcharge as per the mandates of the National Tariff Policy 2016;</b></p> <p><b>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</b></p> | <p>shared on the same.</p> |
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| <p><b>process, the GSC may not be imposed;</b></p> <p><b>N. Objector prays that the Hon'ble Commission may disallow the levy of 'Facilitation Charges on Open Access Consumers';</b></p> <p><b>O. Pass necessary orders as may be deemed appropriate in the facts and circumstances of the case in the interest of justice;</b></p> <p><b>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.</b></p> |  |
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**12. Mytrah Energy (India) Private Limited, #8001, survey no. 109, Q-City, Nanakramguda, Hyderabad- 500032, Telangana, India, Ph: 40 337601001, email id: mail@mytrah.com**

| S.No. | Summary of Objections / Suggestions   | Response of the Licensee  |
|-------|---|---|
| 1     | <p><b>Wind Generation: TS Discoms have considered the NCE generation (wind &amp; Solar) in the power purchase cost. NCE generation = Wind (257.06) MUS &amp; Solar (3544.86) MI-Js, Tariff= Rs 4.29/kWh (Wind) Rs.5.99/kWh (solar).</b></p> <p><b>Comment:</b></p> <ul style="list-style-type: none"> <li>o It is observed that DISCOMs has considered 23% CUF for wind 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 (wind), 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 9.82% in FY 2020-21 to 8.04% in FY 2022-23 by conducting 1 1 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>  | <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> <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</p>  |

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|   | <p>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</p>  | Hon'ble Commission   |
| 3 | <p><b>Tariff Hike</b></p> <p>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 paise for all domestic consumers and 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> <p>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.</p>   |  |
| 4 | <p><b>Late Payment Surcharge (LPS) on Delayed payments:</b></p> <p>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.</p> <p><b>Comment:</b></p> <p>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.</p> <p>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</p> | <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> |

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| <p>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.</p> <p><b>Request to Hon 'ble TSERC:</b></p> <ul style="list-style-type: none"><li><b>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.</b></li><li><b>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.</b></li></ul> |  |
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**13. Mr. 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**

**14. B. Ayodhya Reddy, Spokesperson & Coordinator, Telangana Pradesh Congress Committee**

| 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.</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.</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.</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</p> |

|  | <p>domestic consumers appears to be on the higher side and the same need to be brought down</p>   | <p>2021-22) for TS Discoms is ~ 6% for Domestic category thus the projections made by TS Discoms for FY 2022-23 is justifiable.</p> |         |         |         |  |      |      |      |                                  |       |       |       |   |
|--|---|---|---------|---------|---------|--|------|------|------|----------------------------------|-------|-------|-------|---|
| <p>3</p>                                     | <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:</p> <p><b>Table 1: Agriculture consumption</b></p> <table border="1" data-bbox="309 902 1516 1146"> <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 are 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. SPDCL has also calculated the agricultural sales using ISI methodology.</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.</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   |         |         |  |      |      |      |                                  |       |       |       |   |
| <p>4</p>                                     | <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</p>   |   |         |         |         |  |      |      |      |                                  |       |       |       |   |

|   |   |   |
|---|---|---|
|   | <p>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>  | <p>Additionally 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>   |
| 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 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/tehrangana/nizamabad-irrigationfacilities-lead-to-less-power-consumption-in-northern-districts-724003">https://www.thehansindia.com/tehrangana/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>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> <p>Thus, TS Discoms have considered a past reference i.e. CAGR while projecting sales for LT Agriculture</p> <p>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</p>   | <p>The methodology followed for determining LIS Sales is slightly different than for what is used for projecting other categories.</p>  |

|   |   |   |
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|   | <p>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 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>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 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</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> <p>Further, the steps taken for reduction of losses in</p>   |

T&D network in the state TSDISCOMs have failed to achieve the target set by UDAY on AT&C losses. AT&C losses include collection efficiency along with T&D losses. T&D loss levels should have been much less than AT&C losses. This shows that there is scope to bring down T&D losses from the levels projected in the ARRs. When the estimated T&D losses are brought down to the previous or even to lower levels the quantum of power to be procured will also come down.

**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           |

8

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&D losses were above 20% of the electricity in put in to the network. These four divisions are not located in any far 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&C losses are lower than T&D losses. In these divisions collection efficiency is 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&D losses in these areas was raised in the past also but to no avail. We request the Commission not to allow T&D losses above 5% and direct the DISCOM to

Hyderabad South & Hyderabad Central Circle are as presented:

**Reduction of Abnormal Losses in Hyderabad South Circle**

- Every month intensive inspections are being conducted by operation wings and DPE wing to minimize the theft / Direct Tapping/ Unauthorized usage of power supply to reduce the losses . the existing LT OH lines are replaced by 70sqmm LT AB cable in phased manner so that theft of energy by direct tapping can be avoided.
- 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 to officer concerned to take action accordingly.
- Total overloaded feeders are being identified in summer 2019 and bifurcation works are being carried out by the construction wing and CBD to provide quality of supply as well as reduction of Technical Losses.
- It is proposed to erect additional DTRs of various capacities and DTR capacity will be enhanced during next 2 months for reducing further network losses and to improve reliability of supply.
- Regular maintenance of feeders and LT lines, DTRs and RMUs etc are being carried out for minimizing of



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|    | <b>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.</b>   | breakdowns and interruptions to minimize the losses and improve the sales.<br>➤ Erection of new sub stations to provide reliable and quality of power supply to the consumers, and reduction of technical losses.  |
| 9  | <b>We request the Commission to direct TSNPDCL to make Energy Audit Reports public.</b>  | <p><b><u>Reduction of Abnormal Losses in Hyderabad South Circle</u></b></p> <ul style="list-style-type: none"> <li>➤ New substations and new 11 KV feeders are being proposed under RDS scheme</li> <li>➤ Bifurcation of the following 11kv over load feeders is proposed in Aditya Scheme (FAPCCI Red Hills, Afzal sagar, murad nagar, Gollabasthi, BSNL, fathedarwaza, Prashanth Nagar, Sri Ram Nagar and GHMC park</li> <li>➤ Every month intensive inspections with DPE wing and operation wig staff are being conducted for 2 days doubtful energy meters meters suspected of tampering are beign referred to MRT wing.</li> <li>➤ Replacement of energy meters with smart energy meters is being proposed</li> </ul> |
| 10 | <b>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.</b> | 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.<br>The detailed category-wise justifications for the sales projections, have also been elaborated in the write-ups.   |

| 11                 | <p>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. Actual surplus electricity available according to their submissions should have been 5,458.50 MU.</p> <p><b>Table 3: Power availability, dispatch and surplus (MU)</b></p> <table border="1" data-bbox="303 427 1142 805"> <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><b>Total</b></td> <td><b>58,090.87</b></td> <td><b>52,632.37</b></td> <td><b>5,458.50</b></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 | <b>Total</b> | <b>58,090.87</b> | <b>52,632.37</b> | <b>5,458.50</b> | <p>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.</p> <p>Month-wise energy surplus/ shortfall can be arrived at by considering the month-wise energy availability and energy requirement. 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.</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</p> |
|--------------------|--|--|-----------------|----------|---------|-------------------|-----------|-----------|--------|-----|-----------|-----------|----------|-----------|----------|----------|----------|--------------|------------------|------------------|-----------------|---|
| 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        |          |         |                   |           |           |        |     |           |           |          |           |          |          |          |              |                  |                  |                 |   |
| <b>Total</b>       | <b>58,090.87</b>   | <b>52,632.37</b>   | <b>5,458.50</b> |          |         |                   |           |           |        |     |           |           |          |           |          |          |          |              |                  |                  |                 |   |
| 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>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</p> |                 |          |         |                   |           |           |        |     |           |           |          |           |          |          |          |              |                  |                  |                 |   |

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|    |   | further burden the end consumer.  |
| 13 | <b>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 will be available taking the surplus electricity available to 7,500 MU to 9,000 MU.</b> | 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 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. 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. 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. |
| 14 | <b>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.</b>   |   |
| 15 | <b>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.</b>  |   |
| 16 | <b>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.</b>  | 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                        | <b>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 procured from TPCIL compared to CSPGCL (37 to 52% PLF). We request the Commission to see that merit order is followed in power procurement.</b>  | Merit Order is being followed by TSSLDC. It may be observed that CSPGCIL/CSPDCL is declaring its plant availability in the range of 37 to 52% only instead of normative PAF of 76.5% due to lack of coal, whereas, TPCIL is declaring its Plant availability more than 90%.   |                                   |  |                       |             |             |                |             |             |   |
| 18                        | <p><b>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.</b></p> <p><b>Table 4: Fixed costs</b></p> <table border="1"> <thead> <tr> <th><b>Generation Station</b></th> <th><b>Fixed cost (Per unit) (Rs)</b></th> <th><b>Fixed cost (Per MW) (Rs. In Cr)</b></th> </tr> </thead> <tbody> <tr> <td><b>Kothagudem VII</b></td> <td><b>2.09</b></td> <td><b>1.47</b></td> </tr> <tr> <td><b>KTPP II</b></td> <td><b>2.17</b></td> <td><b>1.41</b></td> </tr> </tbody> </table> | <b>Generation Station</b>   | <b>Fixed cost (Per unit) (Rs)</b> | <b>Fixed cost (Per MW) (Rs. In Cr)</b> | <b>Kothagudem VII</b> | <b>2.09</b> | <b>1.47</b> | <b>KTPP II</b> | <b>2.17</b> | <b>1.41</b> | 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. |
| <b>Generation Station</b> | <b>Fixed cost (Per unit) (Rs)</b>  | <b>Fixed cost (Per MW) (Rs. In Cr)</b>  |                                   |  |                       |             |             |                |             |             |   |
| <b>Kothagudem VII</b>     | <b>2.09</b>  | <b>1.47</b>   |                                   |  |                       |             |             |                |             |             |   |
| <b>KTPP II</b>            | <b>2.17</b>  | <b>1.41</b>   |                                   |  |                       |             |             |                |             |             |   |

|                  |   |  |             |             |               |             |             |                  |             |             |                |             |             |                 |             |             |  |
|------------------|---|--|-------------|-------------|---------------|-------------|-------------|------------------|-------------|-------------|----------------|-------------|-------------|-----------------|-------------|-------------|--|
|                  | <table border="1"> <tr> <td><b>BTPS</b></td> <td><b>2.82</b></td> <td><b>1.92</b></td> </tr> <tr> <td><b>CSPGCL</b></td> <td><b>2.70</b></td> <td><b>1.71</b></td> </tr> <tr> <td><b>Singareni</b></td> <td><b>1.90</b></td> <td><b>1.18</b></td> </tr> <tr> <td><b>TPCIL I</b></td> <td><b>1.49</b></td> <td><b>1.24</b></td> </tr> <tr> <td><b>TPCIL II</b></td> <td><b>2.40</b></td> <td><b>1.99</b></td> </tr> </table>   | <b>BTPS</b>  | <b>2.82</b> | <b>1.92</b> | <b>CSPGCL</b> | <b>2.70</b> | <b>1.71</b> | <b>Singareni</b> | <b>1.90</b> | <b>1.18</b> | <b>TPCIL I</b> | <b>1.49</b> | <b>1.24</b> | <b>TPCIL II</b> | <b>2.40</b> | <b>1.99</b> |  |
| <b>BTPS</b>      | <b>2.82</b>   | <b>1.92</b>  |             |             |               |             |             |                  |             |             |                |             |             |                 |             |             |  |
| <b>CSPGCL</b>    | <b>2.70</b>   | <b>1.71</b>  |             |             |               |             |             |                  |             |             |                |             |             |                 |             |             |  |
| <b>Singareni</b> | <b>1.90</b>   | <b>1.18</b>  |             |             |               |             |             |                  |             |             |                |             |             |                 |             |             |  |
| <b>TPCIL I</b>   | <b>1.49</b>   | <b>1.24</b>  |             |             |               |             |             |                  |             |             |                |             |             |                 |             |             |  |
| <b>TPCIL II</b>  | <b>2.40</b>   | <b>1.99</b>  |             |             |               |             |             |                  |             |             |                |             |             |                 |             |             |  |
| 19               | <p><b>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.</b></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. 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><b>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 KTHPP 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</b></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. The Fixed Cost of Singareni Power Project is approved by Hon'ble Commission &amp; finalized, whereas, TSGENCO costs are provisional &amp; yet to be approved by Commission. Further, the capital costs of new stations of TSGENCO are inclusive of FGD cost, which are subject to approval of</p> |             |             |               |             |             |                  |             |             |                |             |             |                 |             |             |  |

|                    | <p><b>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.</b></p>  | <p>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. 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><b>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.</b></p> <p><b>Table 5: Variable costs</b></p> <table border="1" data-bbox="309 1230 857 1404"> <thead> <tr> <th>Generation Station</th> <th>Variable cost (Per unit) (Rs)</th> </tr> </thead> <tbody> <tr> <td>CSPGCL</td> <td>1.20</td> </tr> </tbody> </table> | Generation Station  | Variable cost (Per unit) (Rs) | CSPGCL | 1.20 | <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 actual O&amp;M charges in the previous control period with escalation as per Hon'ble TSERC Regulation 1 of 2019.</p> <p>However, TSDISCOMS will admit the Fixed Charges as per the approval of TSERC.</p> |
| Generation Station | Variable cost (Per unit) (Rs)   |   |                               |        |      |  |
| CSPGCL             | 1.20  |   |                               |        |      |  |

|                          |   |  |             |                          |             |                 |             |                  |             |                   |             |                 |             |                  |             |             |             |             |             |                  |             |                       |             |  |
|--------------------------|---|--|-------------|--------------------------|-------------|-----------------|-------------|------------------|-------------|-------------------|-------------|-----------------|-------------|------------------|-------------|-------------|-------------|-------------|-------------|------------------|-------------|-----------------------|-------------|--|
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| <b>TPCIL – I</b>         | <b>2.26</b>   |  |             |                          |             |                 |             |                  |             |                   |             |                 |             |                  |             |             |             |             |             |                  |             |                       |             |  |
| <b>NTPC Ramagundam I</b> | <b>2.57</b>   |  |             |                          |             |                 |             |                  |             |                   |             |                 |             |                  |             |             |             |             |             |                  |             |                       |             |  |
| <b>KTPS – V</b>          | <b>2.81</b>   |  |             |                          |             |                 |             |                  |             |                   |             |                 |             |                  |             |             |             |             |             |                  |             |                       |             |  |
| <b>KTPS – VI</b>         | <b>2.82</b>   |  |             |                          |             |                 |             |                  |             |                   |             |                 |             |                  |             |             |             |             |             |                  |             |                       |             |  |
| <b>KTPS – VII</b>        | <b>2.49</b>   |  |             |                          |             |                 |             |                  |             |                   |             |                 |             |                  |             |             |             |             |             |                  |             |                       |             |  |
| <b>KTPP - I</b>          | <b>2.85</b>   |  |             |                          |             |                 |             |                  |             |                   |             |                 |             |                  |             |             |             |             |             |                  |             |                       |             |  |
| <b>KTPP – II</b>         | <b>2.87</b>   |  |             |                          |             |                 |             |                  |             |                   |             |                 |             |                  |             |             |             |             |             |                  |             |                       |             |  |
| <b>BTPS</b>              | <b>2.91</b>   |  |             |                          |             |                 |             |                  |             |                   |             |                 |             |                  |             |             |             |             |             |                  |             |                       |             |  |
| <b>YTPS</b>              | <b>2.49</b>   |  |             |                          |             |                 |             |                  |             |                   |             |                 |             |                  |             |             |             |             |             |                  |             |                       |             |  |
| <b>Singareni</b>         | <b>2.99</b>   |  |             |                          |             |                 |             |                  |             |                   |             |                 |             |                  |             |             |             |             |             |                  |             |                       |             |  |
| <b>Ramagundam – B</b>    | <b>3.43</b>   |  |             |                          |             |                 |             |                  |             |                   |             |                 |             |                  |             |             |             |             |             |                  |             |                       |             |  |
| 22                       | <p><b>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</b></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. TSGENCO Stations are having the coal linkages from the M/s SCCL, irrespective of the coal from open cast mines or underground mines. The actual landed cost of fuel claimed mainly inclusive of</p> |             |                          |             |                 |             |                  |             |                   |             |                 |             |                  |             |             |             |             |             |                  |             |                       |             |  |

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|    | <p>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>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> <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>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.</p> <p>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.</p> |
| 23 | <p>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.</p>  |  |
| 24 | <p>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.</p>   |  |
| 25 | <p>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.</p>   |  |
| 26 | <p>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</p> | <p>TSDISCOMs have addressed Singareni to pursue with Ministry of Coal and SCCL is pursuing with Ministry of Coal, GoI for swapping of coal linkage from Naini to SCCL for Singareni thermal power project.</p>   |



|    |  |  |
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|    | <p><b>GoI 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 India has obligation for ensuring rationalisation of coal linkages. This issue shall be actively taken up with GoI.</b></p>   |  |
| 27 | <p><b>Even more worrying is the GoI’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 GoI. But there is no sign that the central government is reexamining its policy on coal mining.</b></p>                    |  |
| 28 | <p><b>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</b></p> | <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, GoI. DISCOMs have also signed PSAs with M/s. NTPC @ Rs.2.45/Kwh in 2021. 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 | <p><b>Solar power is suitable for decentralised, distributed power generation. Solar power can be generated at the point of consumption. This will bring down T&amp;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</b></p>  | <p>Taking the advantage of waiver of ISTS transmission charges granted by MoP, GoI, 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</p>   |

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|    | scale solar plants and instead procure solar power from decentralised solar power plants.  | distributed solar generation would be uneconomical due to high land cost.  |
| 30 | <p><b>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.</b></p> | <p>TSDSCOMs 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><b>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:</b></p> <p><b>“The PPA with NTPC Ramagundam I &amp; II was expired on 31.10.2017 and the PPA with</b></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>   |

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|    | <p><b>NLC TPS-II Stage-I &amp; II is going to expire by 31.03.2021. Power procurement is continued from Ramagundum 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 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)</b></p> <p><b>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.</b></p> | <p>The fixed cost of these two plants will increase in future. 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. 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. 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><b>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.</b></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. 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><b>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</b></p>   | <p>TS Discoms would like to state that the last tariff hike</p>   |

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

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.

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.

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

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 | Dem and charges | Total new charges | % increase   |
|----------------------|-----------------|-----------------|-------------|-------------------------|--------------------|-----------------|-------------------|--------------|
|                      | Rs. /U          | Rs. /U          | Unit        | Rs.                     | Rs                 | Rs.             | Rs.               | %            |
| <b>LT-1 (A)</b>      |                 |                 |             |                         |                    |                 |                   |              |
| <b>0-50</b>          | <b>1.45</b>     | <b>1.95</b>     | <b>50</b>   | <b>72.50</b>            | <b>97.50</b>       | <b>15</b>       | <b>112.50</b>     | <b>55.20</b> |
| <b>51-100</b>        | <b>2.60</b>     | <b>3.10</b>     | <b>100</b>  | <b>202.50</b>           | <b>252.50</b>      | <b>30</b>       | <b>282.50</b>     | <b>39.50</b> |
| <b>LT-1 (B)(i)</b>   |                 |                 |             |                         |                    |                 |                   |              |
| <b>0-100</b>         | <b>3.50</b>     | <b>3.80</b>     |             |                         |                    |                 |                   |              |
| <b>101-200</b>       | <b>4.30</b>     | <b>4.80</b>     | <b>101</b>  | <b>334.30</b>           | <b>384.80</b>      | <b>45</b>       | <b>429.80</b>     | <b>28.60</b> |
|                      |                 |                 | <b>200</b>  | <b>760.00</b>           | <b>860.00</b>      | <b>45</b>       | <b>905.00</b>     | <b>19.10</b> |
| <b>LT-1 (B) (ii)</b> |                 |                 |             |                         |                    |                 |                   |              |
| <b>0-200</b>         | <b>5.00</b>     | <b>5.50</b>     |             |                         |                    |                 |                   |              |
| <b>201-300</b>       | <b>7.20</b>     | <b>7.70</b>     | <b>201</b>  | <b>1007.20</b>          | <b>1107.70</b>     | <b>75</b>       | <b>1182.70</b>    | <b>17.40</b> |
| <b>301-400</b>       | <b>8.50</b>     | <b>9.00</b>     | <b>301</b>  | <b>1728.50</b>          | <b>1879.00</b>     | <b>75</b>       | <b>1954.00</b>    | <b>13.00</b> |
| <b>401-800</b>       | <b>9.00</b>     | <b>9.50</b>     | <b>401</b>  | <b>2579.00</b>          | <b>2779.50</b>     | <b>75</b>       | <b>2854.50</b>    | <b>10.70</b> |

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 –

- 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.

|                              | 800+  | 9.50     | 10.00      | 801             | 6179.50          | 6580.00 | 150 | 6730.00 | 8.90 | 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. |         |          |            |                 |                  |                             |          |  |  |  |  |                         |      |      |  |  |  |                           |      |      |  |  |  |                        |   |       |  |  |  |                          |       |       |  |  |  |                        |       |       |    |  |  |                              |       |        |    |      |      |
|------------------------------|---|----------|------------|-----------------|------------------|---------|-----|---------|------|--|---------|----------|------------|-----------------|------------------|-----------------------------|----------|--|--|--|--|-------------------------|------|------|--|--|--|---------------------------|------|------|--|--|--|------------------------|---|-------|--|--|--|--------------------------|-------|-------|--|--|--|------------------------|-------|-------|----|--|--|------------------------------|-------|--------|----|------|------|
|                              | a)  |          |            |                 |                  |         |     |         |      |  |         |          |            |                 |                  |                             |          |  |  |  |  |                         |      |      |  |  |  |                           |      |      |  |  |  |                        |   |       |  |  |  |                          |       |       |  |  |  |                        |       |       |    |  |  |                              |       |        |    |      |      |
| 35                           | <p><b>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:</b></p> <p><b>Table 8: Impact of tariff increase - 2</b></p> <table border="1"> <thead> <tr> <th></th> <th>Current</th> <th>Proposed</th> <th>% Increase</th> <th>Rs/Unit Current</th> <th>Rs/Unit Proposed</th> </tr> </thead> <tbody> <tr> <td>Average monthly consumption</td> <td>46 units</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Energy charge 0-50 Rs/U</td> <td>1.45</td> <td>1.95</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Energy charge 51-100 Rs/U</td> <td>2.60</td> <td>3.10</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Demand charge Rs/month</td> <td>0</td> <td>15.00</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Customer charge Rs/month</td> <td>30.00</td> <td>70.00</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Energy charge Rs/month</td> <td>67.00</td> <td>90.00</td> <td>34</td> <td></td> <td></td> </tr> <tr> <td>Monthly Electricity bill Rs.</td> <td>97.00</td> <td>175.00</td> <td>80</td> <td>2.10</td> <td>3.78</td> </tr> </tbody> </table> |          |            |                 |                  |         |     |         |      |  | Current | Proposed | % Increase | Rs/Unit Current | Rs/Unit Proposed | 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 |  |  | Monthly Electricity bill Rs. | 97.00 | 175.00 | 80 | 2.10 | 3.78 |
|                              | Current   | Proposed | % Increase | Rs/Unit Current | Rs/Unit Proposed |         |     |         |      |  |         |          |            |                 |                  |                             |          |  |  |  |  |                         |      |      |  |  |  |                           |      |      |  |  |  |                        |   |       |  |  |  |                          |       |       |  |  |  |                        |       |       |    |  |  |                              |       |        |    |      |      |
| 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         |                 |                  |         |     |         |      |  |         |          |            |                 |                  |                             |          |  |  |  |  |                         |      |      |  |  |  |                           |      |      |  |  |  |                        |   |       |  |  |  |                          |       |       |  |  |  |                        |       |       |    |  |  |                              |       |        |    |      |      |
| Monthly Electricity bill Rs. | 97.00   | 175.00   | 80         | 2.10            | 3.78             |         |     |         |      |  |         |          |            |                 |                  |                             |          |  |  |  |  |                         |      |      |  |  |  |                           |      |      |  |  |  |                        |   |       |  |  |  |                          |       |       |  |  |  |                        |       |       |    |  |  |                              |       |        |    |      |      |

|   |  |   |              |              |  |  |  |  |              |               |            |  |  |  |
|---|--|---|--------------|--------------|--|--|--|--|--------------|---------------|------------|--|--|--|
|   | <table border="1"> <tr> <td data-bbox="306 199 768 306"><b>Minimum charges single ph. &lt; 1 kW Rs.</b></td> <td data-bbox="768 199 919 306"><b>25.00</b></td> <td data-bbox="919 199 1075 306"><b>65.00</b></td> <td data-bbox="1075 199 1217 306"></td> <td data-bbox="1217 199 1360 306"></td> <td data-bbox="1360 199 1510 306"></td> </tr> <tr> <td data-bbox="306 306 768 412"><b>Monthly No consumption bill Rs.</b></td> <td data-bbox="768 306 919 412"><b>55.00</b></td> <td data-bbox="919 306 1075 412"><b>150.00</b></td> <td data-bbox="1075 306 1217 412"><b>173</b></td> <td data-bbox="1217 306 1360 412"></td> <td data-bbox="1360 306 1510 412"></td> </tr> </table>  | <b>Minimum charges single ph. &lt; 1 kW Rs.</b> | <b>25.00</b> | <b>65.00</b> |  |  |  | <b>Monthly No consumption bill Rs.</b> | <b>55.00</b> | <b>150.00</b> | <b>173</b> |  |  |  |
| <b>Minimum charges single ph. &lt; 1 kW Rs.</b> | <b>25.00</b>   | <b>65.00</b>                                    |              |              |  |  |  |  |              |               |            |  |  |  |
| <b>Monthly No consumption bill Rs.</b>          | <b>55.00</b>   | <b>150.00</b>                                   | <b>173</b>   |              |  |  |  |  |              |               |            |  |  |  |
| 36  | <p><b>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!</b></p> |   |              |              |  |  |  |  |              |               |            |  |  |  |
| 37  | <p><b>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 tariff impact on small consumers and would respect the very idea of slab wise telescopic</b></p>  |   |              |              |  |  |  |  |              |               |            |  |  |  |

tariff. For example, 4-5% increase in energy charge for 0-100 Units, 5-6% for 101-200 and 15% increase for > 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.

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**Electrical accidents**

**Table 9:**

|                     | No. of accidents |            |            | Exgratia paid |            |            |
|---------------------|------------------|------------|------------|---------------|------------|------------|
|                     | NPDCCL           | SPDCL      | Total      | NPDCCL        | SPDCL      | Total      |
| <b>2020-21</b>      | <b>460</b>       | <b>238</b> | <b>698</b> | <b>351</b>    | <b>178</b> | <b>529</b> |
| <b>H1 of 202122</b> | <b>222</b>       | <b>76</b>  | <b>298</b> | <b>123</b>    | <b>133</b> | <b>356</b> |

1. 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&D network.

1. The particulars of Accidents occurred since the F.Y.2017 to till date are as follows

| Year           | No. of Fatal Accidents Occurred |
|----------------|---------------------------------|
|                | Human                           |
| <b>2017-18</b> | 332                             |
| <b>2018-19</b> | 294                             |
| <b>2019-20</b> | 258                             |
| <b>2020-21</b> | 238                             |



|  |  |  |    |
|--|--|--|----|
|  |  | <b>2021-22 Upto Sept.</b>  | 76 |
|  |  | <p>It is to submit that the safety measures are already taken up to avoid electrical accidents which are as detailed below:</p> <p>i) Yearly once pre-monsoon inspections of lines are conducted with a program and the scheduled maintenance works are being carried out duly publishing in newspapers in advance, every month Second Saturday maintenance works at each substation are carried out.</p> <p>ii) A detailed survey is being conducted for 33 KV, 11 KV and LT lines regularly to identify loose spans, leaned poles, rusted/damaged poles, in adequate clearances and the following rectification works are being carried promptly.</p> <ul style="list-style-type: none"> <li>a) Insertion of intermediate poles.</li> <li>b) Replacement of damaged poles.</li> <li>c) Replacement of damaged conductors.</li> <li>d) Providing of spacers.</li> <li>e) Restringing of loose spans.</li> <li>f) Replacement of Disc's/Insulators.</li> <li>g) Rectification of stays.</li> <li>h) Replacement of damaged AB switches.</li> </ul> <p>iii) Survey of Distribution Transformer structures is being conducted regularly and rectification works are being executed on top priority as follows:</p> <ul style="list-style-type: none"> <li>a) Arresting of leakages and refilling of Transformer oil.</li> <li>b) Rectification of defective AB switches.</li> <li>c) Rectification of earth pipes and earthing.</li> <li>d) Load balancing of DTRs.</li> <li>e) Correction of HG Fuse gaps.</li> </ul> |    |

|  |  |  |
|--|--|--|
|  | <p><b>2. 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.</b></p> | <p>f) Replacement of LT bushing rods.<br/> g) Rectification of section fuses.<br/> h) Providing of fencing at vulnerable places.<br/> i) Raising of plinth</p> <p>In addition to the above, various rectification works as enclosed in the annexure were carried out under Palle Pragrathi and Pattana Pragrathi Schemes. Due to the above measures, the accidents are reducing from 330(2017-18) to 238(2020-21).</p> <p>iv) Strict instructions were issued to the field officers to adhere to the department standard procedure for earthing of Distribution Transformers.</p> <p>It is further submitted that there is a gradual reduction in number of deaths due to electrocution since we are keeping on conducting the awareness camps among the general public and also taking up diligent technical check up of lines etc., periodically to curb fatal &amp; Non-fatal accidents due to electrocution and we are also imparting training to all the field staff on the subject of safety measures.</p> |
|--|--|--|

2. The cause-wise details of the electrical accidents occurred in the F.Y.2020-21 are as follows:

| Sl No | Reasons   | Human      |           | Animals    |           | Total      |           |
|-------|---|------------|-----------|------------|-----------|------------|-----------|
|       |   | FATAL      | NON-FATAL | FATAL      | NON-FATAL | FATAL      | NON-FATAL |
| (i)   | SNAPPING OF CONDUCTORS  | 16         | 9         | 194        | 0         | 210        | 9         |
| (ii)  | ACCIDENTAL CONTACT WITH LIVE ELECTRIC WIRE / EQUIPMENT          | 110        | 22        | 212        | 0         | 322        | 22        |
| (iii) | VIOLATION / NEGLIGENCE OF SAFETY MEASURES / LACK OF SUPERVISION | 29         | 4         | 0          | 0         | 29         | 4         |
| (iv)  | DEFECTIVE APPLIANCES/ APPARATUS / TOOLS                         | 53         | 5         | 104        | 0         | 157        | 5         |
| (v)   | INADEQUATE / LACK OF MAINTENANCE                                | 0          | 1         | 1          | 0         | 1          | 1         |
| (vi)  | UNAUTHORISED WORK   | 29         | 6         | 5          | 0         | 34         | 6         |
| (vii) | ANY OTHER REASONS   | 1          | 6         | 1          | 0         | 2          | 6         |
|       | <b>TOTAL</b>  | <b>238</b> | <b>53</b> | <b>517</b> | <b>0</b>  | <b>755</b> | <b>53</b> |

The cause wise details of the electrical accidents occurred in the F.Y.H1 of 2021-22 are as follows:

| Sl. No. | REASONS   | HUMAN     |           | ANIMALS    |           | TOTAL      |           |
|---------|---|-----------|-----------|------------|-----------|------------|-----------|
|         |   | FATAL     | NON-FATAL | FATAL      | NON-FATAL | FATAL      | NON-FATAL |
| (i)     | SNAPPING OF CONDUCTORS  | 4         | 0         | 47         | 0         | 51         | 0         |
| (ii)    | ACCIDENTAL CONTACT WITH LIVE ELECTRIC WIRE / EQUIPMENT          | 38        | 12        | 83         | 0         | 121        | 12        |
| (iii)   | VIOLATION / NEGLIGENCE OF SAFETY MEASURES / LACK OF SUPERVISION | 5         | 2         | 0          | 0         | 5          | 2         |
| (iv)    | DEFECTIVE APPLIANCES / APPARATUS / TOOLS                        | 18        | 1         | 75         | 0         | 93         | 1         |
| (v)     | INADEQUATE / LACK OF MAINTENANCE                                | 2         | 0         | 0          | 0         | 2          | 0         |
| (vi)    | UNAUTHORISED WORK   | 5         | 2         | 0          | 0         | 5          | 2         |
| (vii)   | ANY OTHER REASONS   | 4         | 4         | 1          | 0         | 5          | 4         |
|         | <b>TOTAL</b>  | <b>76</b> | <b>21</b> | <b>206</b> | <b>0</b>  | <b>282</b> | <b>21</b> |

In respect of unauthorized meddling of infrastructure, the

|  |  |   |
|--|--|---|
|  | <p><b>3. The information provided by TSDISOMs on electrical accidents show that most of the fatal accidents took place in circles with predominantly rural services. These accidents are low in urban circles. This implies that the rural consumers are not receiving quality service. Every step shall be taken to correct this anomaly.</b></p> <p><b>4. The Construction, Operation &amp; Maintenance of electrical plant &amp; 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.</b></p> <p><b>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</b></p> <p><b>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</b></p> | <p>consumers are repeatedly requested through print and electronic media that not to meddle electrical infrastructure &amp; intimate the concerned section officer for necessary help.</p> <p>Cause-wise analysis of accidents data is being collected and based on the reports, action on staff/responsibility is fixed. Preventive measures are taken up.</p> <p><b>3.</b> In Rural areas, the lines are lengthy, huge no of Agl services are existing. Awareness camps are conducted during safety week and the Consumers/Farmers are requested not to touch the bare conductor/ line DTRs and request them to inform the concerned section officer in case of any DTR failure/untoward incident.</p> <p>4. Safety equipment are procured and training is imparted to the O&amp;M staff to utilize the safety appliances (i)Helmet (ii)Safety Belt (iii)Tool Kit (iv)Earthing rods (v)Pair of gloves or gauntlets.</p> <p>5. This is a continuous process and TSSPDCL is taking all possible precautions to avoid the electrical accidents. In this FY.2021-22 budget of Rs. 11.425 Crores was allotted (as on 31.01.2022) for Replacement of AB switches and budget of Rs.3.83 Crores was allotted (as on 31.01.2022) for Renovation of DTR Earthing to safeguard the living beings from Electrical accidents.</p> <p>6. TSSPDCL is giving top priority for 11KV AB Switches maintenance and all possible efforts are being made to keep the AB Switches in working conditions. Due to the wear and tear the fixed &amp; moving contacts of AB Switches</p> |
|--|--|---|

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 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 & 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 & 43.

9. To the best of our knowledge TSDISCOMs are not implementing the above

might be damaged. The repair/replacement of AB Switches is a continuous process. On report of specific cases, the rectification work will be done immediately

7. In this FY.2021-22 the details of the Defective Lightning Arrestors identified and No. of LAs replaced with healthy Lightning Arrestors in the F.Y.2021-22 are as follows:

| No. of LA's replaced |                |                   |                |
|----------------------|----------------|-------------------|----------------|
| 33KV Station type    | 33KV line type | 11KV Station type | 11KV line type |
| 1603                 | 1500           | 1874              | 3800           |

8. In TSSPDCL one DE/M&P is available in each circle and the M&P wing is carrying out the periodical testing of electrical switch gear for both 33KV & 11KV H.T services existing in the field.

In addition to that the DE/TRE conducts the various periodical testing for PTRs. The Quality Control and Quality Assurance wing will inspect the all new works and existing installations and ensuring the works as per CEA regulations/Construction Standards.

The appointment of chartered Safety Engineer will be looked into.

9 All TSERC regulations and CEA guidelines will be

mandatory regulations. TSERC is requested to order TSDISCOMs to submit detailed report and evidence to show their total commitment to these management level Regulations.

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&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.

implemented as instructed by the concerned authorities.

10 It is to submit that safety measures are taken up and the year-wise budget allotted is shown below.

| <b>SAFETY MEASURES SCHEME</b> |                        |                                  |
|-------------------------------|------------------------|----------------------------------|
| <b>Year wise</b>              | <b>SCHEME</b>          | <b>Budget Allotted Rs In Crs</b> |
| 2014-15                       | SAFETY MEASURES SCHEME | 0.21                             |
| 2015-16                       | SAFETY MEASURES SCHEME | 0.62                             |
| 2016-17                       | SAFETY MEASURES SCHEME | 43.22                            |
| 2017-18                       | SAFETY MEASURES SCHEME | 19.20                            |
| 2018-19                       | SAFETY MEASURES SCHEME | 22.82                            |
| 2019-20                       | SAFETY MEASURES SCHEME | 23.68                            |

The following works are taken up under safety measures.

|         |   | <table border="1" data-bbox="1583 219 2400 743"> <thead> <tr> <th>Sl.No</th> <th>Particulars</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Erection of intermediate poles for proper clearance</td> </tr> <tr> <td>2</td> <td>Providing of Earthing</td> </tr> <tr> <td>3</td> <td>Providing of fencing</td> </tr> <tr> <td>4</td> <td>Reconstruction of damaged DTR plinth</td> </tr> <tr> <td>5</td> <td>Plinth Raisings</td> </tr> <tr> <td>6</td> <td>Providing of SMC Distribution boxes</td> </tr> <tr> <td>7</td> <td>Providing of foot cross arms</td> </tr> <tr> <td>8</td> <td>Rectification of DTR structures</td> </tr> <tr> <td>9</td> <td>Replacement of damaged AB cable</td> </tr> <tr> <td>10</td> <td>Providing of safety materials viz Gum boots, Helmets</td> </tr> <tr> <td>11</td> <td>Running of Neutral wire from SS</td> </tr> </tbody> </table> <p data-bbox="1583 768 2502 930">In addition to the above, it is to submit that under Palle Pragathi and Pattana Pragathi Programmes, the works mentioned in the list enclosed are taken up and completed for network improvement and safety.</p> | Sl.No     | Particulars | 1     | Erection of intermediate poles for proper clearance | 2        | Providing of Earthing | 3         | Providing of fencing | 4        | Reconstruction of damaged DTR plinth | 5        | Plinth Raisings | 6        | Providing of SMC Distribution boxes | 7        | Providing of foot cross arms  | 8 | Rectification of DTR structures | 9 | Replacement of damaged AB cable | 10 | Providing of safety materials viz Gum boots, Helmets | 11 | Running of Neutral wire from SS |
|---------|---|---|-----------|-------------|-------|---|----------|-----------------------|-----------|----------------------|----------|--------------------------------------|----------|-----------------|----------|-------------------------------------|----------|---|---|---------------------------------|---|---------------------------------|----|--|----|---------------------------------|
| Sl.No   | Particulars   |   |           |             |       |   |          |                       |           |                      |          |                                      |          |                 |          |                                     |          |   |   |                                 |   |                                 |    |  |    |                                 |
| 1       | Erection of intermediate poles for proper clearance   |   |           |             |       |   |          |                       |           |                      |          |                                      |          |                 |          |                                     |          |   |   |                                 |   |                                 |    |  |    |                                 |
| 2       | Providing of Earthing   |   |           |             |       |   |          |                       |           |                      |          |                                      |          |                 |          |                                     |          |   |   |                                 |   |                                 |    |  |    |                                 |
| 3       | Providing of fencing  |   |           |             |       |   |          |                       |           |                      |          |                                      |          |                 |          |                                     |          |   |   |                                 |   |                                 |    |  |    |                                 |
| 4       | Reconstruction of damaged DTR plinth  |   |           |             |       |   |          |                       |           |                      |          |                                      |          |                 |          |                                     |          |   |   |                                 |   |                                 |    |  |    |                                 |
| 5       | Plinth Raisings   |   |           |             |       |   |          |                       |           |                      |          |                                      |          |                 |          |                                     |          |   |   |                                 |   |                                 |    |  |    |                                 |
| 6       | Providing of SMC Distribution boxes   |   |           |             |       |   |          |                       |           |                      |          |                                      |          |                 |          |                                     |          |   |   |                                 |   |                                 |    |  |    |                                 |
| 7       | Providing of foot cross arms  |   |           |             |       |   |          |                       |           |                      |          |                                      |          |                 |          |                                     |          |   |   |                                 |   |                                 |    |  |    |                                 |
| 8       | Rectification of DTR structures   |   |           |             |       |   |          |                       |           |                      |          |                                      |          |                 |          |                                     |          |   |   |                                 |   |                                 |    |  |    |                                 |
| 9       | Replacement of damaged AB cable   |   |           |             |       |   |          |                       |           |                      |          |                                      |          |                 |          |                                     |          |   |   |                                 |   |                                 |    |  |    |                                 |
| 10      | Providing of safety materials viz Gum boots, Helmets  |   |           |             |       |   |          |                       |           |                      |          |                                      |          |                 |          |                                     |          |   |   |                                 |   |                                 |    |  |    |                                 |
| 11      | Running of Neutral wire from SS   |   |           |             |       |   |          |                       |           |                      |          |                                      |          |                 |          |                                     |          |   |   |                                 |   |                                 |    |  |    |                                 |
| 39      | <p data-bbox="306 992 688 1024"><b>TSDISCOMs' financial crisis:</b></p> <p data-bbox="306 1049 717 1081"><b>Table 10: Deficit (Rs. In Cr)</b></p> <table border="1" data-bbox="306 1109 1085 1378"> <thead> <tr> <th>Year</th> <th>NPDCL</th> <th>SPDCL</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>2018-19</td> <td>3,877.87</td> <td>6,354.87</td> <td>10,232.74</td> </tr> <tr> <td>2019-20</td> <td>1,712.28</td> <td>5,604.01</td> <td>7,316.29</td> </tr> <tr> <td>2020-21</td> <td>2,369.79</td> <td>6,296.97</td> <td>8,666.76</td> </tr> </tbody> </table> | 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 | <p data-bbox="1540 992 2502 1287">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> <p data-bbox="1540 1320 2502 1401">Covid Pandemic and also subsequent second wave has greatly impacted the finances of Discoms. The Policies of the</p> |   |                                 |   |                                 |    |  |    |                                 |
| 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        |
| <b>Total</b> | <b>11,575.92</b> | <b>25,263.71</b> | <b>36,839.63</b> |

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         |
| <b>Total</b> | <b>9,592</b> | <b>22,072</b> | <b>31,664</b> |

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.

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

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



|    |  |   |
|----|--|---|
| 40 | <p><b>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.</b></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> <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> <li>● Pending information from ICAD department on Lift Irrigation (LI) schemes.</li> <li>● Pending finalisation of the annual accounts for the base year in the Board Meeting, whose values are considered for revisions in the cost estimates of ARR for Distribution Business.</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</li> </ul> |
|----|--|---|

|                    |   | <p>of lockdown due to COVID-19 pandemic.</p> <ul style="list-style-type: none"> <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 dismissed 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 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> control period along with the APR filing for FY2019-20. Additionally, TS Discoms have also filed the APR for 2020-21 on 31 December 2021.</p> <p>TS Discoms are in the process of filing True up claim for Retail Supply Business for FY2018-19 to FY2021-22(prov.) before the Hon'ble Commission.</p> |              |           |              |  |  |  |  |   |
|--------------------|---|---|--------------|-----------|--------------|--|--|--|--|---|
| 41                 | <p><b>Arrears:</b></p> <p><b>Table 12: Arrears of Rs. 50,000 and more pending for six months As on 30-09-2021</b></p> <p style="text-align: center;"><b>(Rs. In Cr)</b></p> <table border="1" data-bbox="309 1286 1204 1393"> <thead> <tr> <th data-bbox="309 1286 462 1393"><b>DISCO<br/>M</b></th> <th data-bbox="462 1286 669 1393"><b>LT</b></th> <th data-bbox="669 1286 938 1393"><b>HT</b></th> <th data-bbox="938 1286 1204 1393"><b>Total</b></th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table> | <b>DISCO<br/>M</b>  | <b>LT</b>    | <b>HT</b> | <b>Total</b> |  |  |  |  | <p>It is inform that, the TSSPDCL has furnished and made available the details of Outstanding dues from the Private Consumers as well as Government Consumers/Departments. Further, it is to inform that, there is no pending subsidy payment from the State Government</p> |
| <b>DISCO<br/>M</b> | <b>LT</b>   | <b>HT</b>   | <b>Total</b> |           |              |  |  |  |  |   |
|                    |   |   |              |           |              |  |  |  |  |   |

|       |   |           |           |          |           |       |        |          |          |       |        |           |           |   |
|-------|---|-----------|-----------|----------|-----------|-------|--------|----------|----------|-------|--------|-----------|-----------|---|
|       | <table border="1"> <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> </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) 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> | 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>to TSSPDCL.</p> <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> <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 regularly 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> |
| 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 |          |           |       |        |          |          |       |        |           |           |   |
| 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><b>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.</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 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><b>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:</b></p> <table border="1" data-bbox="306 618 1518 992"> <thead> <tr> <th>Year</th> <th>2016-17</th> <th>2017-18</th> <th>2018-19</th> <th>2019-20</th> <th>2020-21</th> </tr> </thead> <tbody> <tr> <td><b>Previous year’s DISCOMs loss to be taken over by the State</b></td> <td><b>0% of the loss of 2015-16</b></td> <td><b>5% of the loss of 2016-17</b></td> <td><b>10% of the loss of 2017-18</b></td> <td><b>25% of the loss of 2018-19</b></td> <td><b>50% of the previous year loss.</b></td> </tr> </tbody> </table> <p><b>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.”</b></p> <p><b>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.</b></p> | Year   | 2016-17                           | 2017-18                           | 2018-19                               | 2019-20 | 2020-21 | <b>Previous year’s DISCOMs loss to be taken over by the State</b> | <b>0% of the loss of 2015-16</b> | <b>5% of the loss of 2016-17</b> | <b>10% of the loss of 2017-18</b> | <b>25% of the loss of 2018-19</b> | <b>50% of the previous year loss.</b> | <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> <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> </ul> |
| Year  | 2016-17   | 2017-18  | 2018-19                           | 2019-20                           | 2020-21                               |         |         |   |                                  |                                  |                                   |                                   |                                       |   |
| <b>Previous year’s DISCOMs loss to be taken over by the State</b> | <b>0% of the loss of 2015-16</b>  | <b>5% of the loss of 2016-17</b>   | <b>10% of the loss of 2017-18</b> | <b>25% of the loss of 2018-19</b> | <b>50% of the previous year loss.</b> |         |         |   |                                  |                                  |                                   |                                   |                                       |   |

|    |   |  |
|----|---|--|
|    |   | <ul style="list-style-type: none"> <li>• Further benefits to SC &amp; ST consumers for domestic use, Haircutting salons, Dobhighats, Laundry shops, powerlooms, poultry farms and spinning mills</li> </ul>            |
| 44 | <p><b>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 advise the State Government of AP to take relevant measures to improve financial health of TSDISCOMs.</b></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> |

**15. Dr. Narasimha Reddy, Public Policy Expert, 201, Aarathi Residency, LN Colony, Hyderabad 500059**

| S.No. | Summary of Objections / Suggestions   | Response of the Licensee  |
|-------|---|---|
| 1     | <p><b>1. Sales forecast</b></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><b>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. 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</b></p> <table border="1" data-bbox="309 438 1384 609"> <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> <p><b>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.</b></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 | <p>TS Discoms would like to state that the assessment of agricultural consumption are 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>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.</p> <p>Additionally 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><b>According to TSNPDCL filing LT agriculture consumption will be 7,525 MU during FY 202-</b></p>   | <p>TS Discoms are expecting that the sales of agriculture</p> |         |         |         |  |      |      |      |                                  |       |       |       |   |

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|---|--|--|
|   | <p><b>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.</b></p>   | <p>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> <p>Thus, TS Discoms have considered a past reference i.e. CAGR while projecting sales for LT Agriculture</p> <p>Consumption of LIS is carefully determined as explained above; a separate team dedicatedly works on LIS sales projections.</p> |
| 5 | <p><b>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.</b></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</p>   |



|               |  | <p>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><b>T&amp;D Losses</b></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 loss levels should have been much less than AT&amp;C losses. TSERC needs to focus on this aspect.</p> <p><b>Table 2: T&amp;D and AT&amp;C losses in Hyderabad</b></p> <table border="1" data-bbox="306 847 1322 1075"> <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> <tr> <td rowspan="3">Hyd – South</td> <td>Asmangadh</td> <td>39</td> <td>35.01</td> </tr> <tr> <td>Begumbazar</td> <td>35</td> <td>34.01</td> </tr> <tr> <td>Charminar</td> <td>38</td> <td>35.73</td> </tr> </tbody> </table> <p>TSERC should direct TSNPDCL to release Energy Audit Reports into public domain.</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 | <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> |
| 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           |                |                 |               |             |    |       |             |           |    |       |            |    |       |           |    |       |  |
| 7             | <p>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.</p> <p><b>Table 3: Power availability, dispatch and surplus (MU)</b></p>  | <p>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.</p> <p>TS Discoms would like to clarify that the annual energy surplus shown of 3,066 MU, is after netting off</p>         |                 |                |                 |               |             |    |       |             |           |    |       |            |    |       |           |    |       |  |

|   | <b>Generating Station</b>   | <b>Availability</b> | <b>Dispatch</b>  | <b>Surplus</b>  |  |
|---|---|---------------------|------------------|-----------------|--|
|   | <b>TSGENCO – Thermal</b>  | <b>27,434.98</b>    | <b>27,206.10</b> | <b>228.88</b>   |  |
|   | <b>CGS</b>  | <b>21,611.51</b>    | <b>17,960.27</b> | <b>3,651.24</b> |  |
|   | <b>Singareni</b>  | <b>9,044.38</b>     | <b>7,466.00</b>  | <b>1,578.38</b> |  |
|   | <b>Total</b>  | <b>58,090.87</b>    | <b>52,632.37</b> | <b>5,458.50</b> |  |
| 8 | <b>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</b> |                     |                  |                 | <p>the energy shortfall of 2,393 MU from the energy surplus of 5,459 MU.</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>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>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 projections considering only threshold level PLF simply or highest PLF projected by one of the private Thermal generator (Sembcorp</p> |

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|    |   | Energy India Ltd, Earlier TPCIL) would be hypothetical. 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. 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. |
| 9  | <b>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.</b>  | TS Discoms have already responded to this objection in query no. 7.   |
| 10 | <b>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 procured from TPCIL compared to CSPGCL (37 to 52% PLF). We request the Commission to see that merit order is followed in power procurement.</b> | Merit Order is being followed by TSSLDC. It may be observed that CSPGCIL/CSPDCL is declaring its plant availability in the range of 37 to 52% only instead of normative PAF of 76.5% due to lack of coal, whereas, TPCIL is declaring its Plant availability more than 90%.   |

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| <p>11</p> | <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 అకౌంటెంట్ జనరల్ అభిప్రాయం</li> <li>• ఇంటర్ కార్పొరేట్ డిపాజిట్లకు సంబంధించిన ఆడిట్.</li> </ul> | <p>తెలంగాణ హైకోర్టులో ఈ అంశం విచారణలో ఉంది</p>   |
| <p>12</p> | <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 మరియు అంతర్గత సామర్థ్యం తో ఆర్థిక లోటు ని భర్తీ చేస్తామని వార్షిక ప్రతిపాదనల నివేదికలో అదనపు సమాచారంలో కూడా పొందు పరిచాము.</p> |

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| 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 పెడితే ఉపయుక్తంగా ఉండేది.</p>   | <p>కేంద్ర విద్యుత్ మంత్రిత్వ శాఖ జారీ చేసిన పేమెంట్ సెక్యూరిటీ మెకానిజం మార్గదర్శకాలకు TSDISCOMలు కట్టుబడి ఉన్నాయి. దానికి అనుగుణంగా అందుబాటులో ఉన్న నాన్ ఫండ్ బేస్డ్ క్రెడిట్ లిమిట్స్ ప్రకారం మరియు పవర్ పర్ఫెజ్ అగ్రిమెంట్ల నిబంధనలు &amp; షరతుల ప్రకారం ఎప్పటికప్పుడు జనరేటర్లకు లెటర్ ఆఫ్ క్రెడిట్ జారీ చేయడం జరుగుతుంది.</p>                            |
| 14 | <p><b>7.0 విద్యుత్ చార్జీల పెంపు - రాష్ట్ర ప్రభుత్వ అభిప్రాయం</b></p> <p>రాష్ట్ర ప్రభుత్వ అభిప్రాయం చర్చించ లేదు. విద్యుత్ చార్జీలు పెంచవద్దు అని ప్రభుత్వ అభిప్రాయ నేపథ్యంలో, ప్రభుత్వం నుంచి వచ్చిన సూచనలు పరిగణనలోనికి తీసుకున్నారా? అనవసర వ్యయాన్ని తగ్గించమని సూచించినప్పుడు, ఎక్కడ అనవసర వ్యయం జరుగుతుందో గుర్తించి, ఈ వార్షిక అంచనాల నివేదిక పెట్టాల్సింది.</p>   | <p>డిస్కం వారు విద్యుత్ చార్జీలు పెంపు ప్రతిపాదనలు ఆర్థిక లోటు దృష్ట్యా సమర్పించడం జరిగింది. ఈ. ఆర్. సి వారు డిస్కం వారు సమర్పించిన ఆర్థిక వ్యయాన్ని సమగ్రంగా పరిశీలన చేసి టారిఫ్ ఆర్డర్ ఇవ్వడం జరుగుతుంది.</p>   |
| 15 | <p><b>8.0 అవినీతి</b></p> <p>విద్యుత్ పంపిణీ సంస్థల్లో అవినీతి ఉన్న పరిస్థితులలో, అవినీతిని అరికట్టే చర్యలు లేవు. విద్యుత్ వ్యవస్థను ప్రజాళన కొరకు తీసుకున్న చర్యల గురించి ఈ వార్షిక ఆదాయ అవసరాల అంచనా (ఏఆర్ఆర్)నివేదికలో ప్రస్తావన లేదు. రైతులు కొత్త కనెక్షన్లు కావాలన్నా, ట్రాన్స్మిస్యోన్ల మరమ్మతులు 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 సిబ్బందిపై చర్యలు తీసుకుంటారు. దీనికి అదనంగా, అన్ని విఫలమైన డిస్ట్రిబ్యూషన్ ట్రాన్స్ఫార్మర్లను సంబంధిత మరమ్మతు ఏజెన్సీలు మరమ్మతులు చేస్తాయి. ఇంకా SPM రిపేరింగ్ షెడ్ కి సంబంధించిన అధికారులు సంబంధిత పేరు మరియు మొబైల్ నంబర్లను SPM షెడ్ గోడపై ప్రదర్శించాలని ఆదేశించారు.</p> |

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9.0 సోలార్, విండ్ పాలసీ

పాత మరియు ప్రస్తుత విధానం విద్యుత్ నియంత్రణ మండలి పరిధిలోకి వస్తుందా? ప్రస్తుత సవరణల గురించిన ప్రస్తావన నివేదికలో ఎందుకు లేవు? డిస్కంలను ఆర్థికంగా బాగా దెబ్బతీస్తున్న విధానం 'పిచ్ అండ్ టారిఫ్'. ప్రకృతి సహకరించినప్పుడు మాత్రమే పవన, సౌర విద్యుత్ ఉత్పత్తి అవుతుంది. ఆ సమయంలో ధర్మల్ ఫ్లాంట్ల ఉత్పత్తి సామర్థ్యాన్ని తగ్గిస్తారు. సామర్థ్యాన్ని తగ్గించినప్పటికీ పూర్తిస్థాయి

ఉత్పత్తికి అవసరమయ్యే బోగ్గును 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.

తెలంగాణ రాష్ట్ర విద్యుత్ నియంత్రణ మండలి వారు జారీ చేసిన రెగ్యులేషన్ నెం. 1, 2014 ప్రకారం రాజ్యాంగ తేదీ నాటికి పూర్వపు ఆంధ్రప్రదేశ్ రెగ్యులేటరీ కమిషన్ జారీ చేసిన అన్ని నిబంధనలు, నిర్ణయాలు, ఆదేశాలు తెలంగాణ రాష్ట్రంలోని విద్యుత్లో వాటాదారులకు వర్తింపజేస్తాయి. వాటిని రద్దు చేయబడిన లేదా సవరించబడే వరకు ప్రభావం కొనసాగుతుంది. మరో మాటలో చెప్పాలంటే, స్టేట్ రెగ్యులేటరీ జారీ చేసిన తాజా నిబంధనలు వర్తిస్తాయి.

సోలార్ మరియు విండ్ తప్పనిసరిగా నడపాల్సిన జనరేటర్లు. తప్పనిసరిగా అమలు చేయాల్సిన స్థితి కారణంగా, ధర్మల్ పవర్ ప్లాంట్లు వాటి ధరను పెంచడాన్ని వెనక్కి తీసుకోవలసి ఉంటుంది. డిస్కామ్లు వారి RPPO బాధ్యతను తీర్చడానికి పునరుత్పాదక శక్తిని కొనుగోలు చేయాలి. GoI ద్వారా నిర్ణయించబడిన అధిక RPPO లక్ష్యాన్ని DISCOMలు చేరుకోకపోతే భారత ప్రభుత్వం జరిమానాలను ప్రతిపాదిస్తోంది. పైన పేర్కొన్న అన్ని అంశాలను పరిగణనలోకి తీసుకుంటే, సగటు విద్యుత్ కొనుగోలు వ్యయాన్ని తగ్గించడానికి TSDISCOMలు నిరంతర ప్రయత్నాలు చేస్తున్నాయి.

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| 17 | <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 చేసినట్టు 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>గౌరవనీయమైన TSERC విద్యుత్ కొనుగోళ్ల కోసం తీసుకున్న రుణాలపై వడ్డీ భాగాన్ని అనుమతించదని పేర్కొనడం జరుగుతుంది.</p>  |
| 18 | <p><b>11.0 వ్యవసాయ విద్యుత్ సమస్యలు</b></p> <p>వీటి పైన స్పష్టమైన సమాచారం లేదు. ఇవ్వాలి అవసరం ఉంది:</p> <p>11.1 రాష్ట్రంలో లక్షల రైతు కుటుంబాలకు ఉచిత విద్యుత్ అందిస్తున్నట్లు ప్రభుత్వం చెబుతుంది. ఈ సంఖ్య పెరిగిందా?</p> <p>11.2 వ్యవసాయానికి 24 గంటల ఉచిత విద్యుత్ అందిస్తున్నట్లు చెప్పినా, సరఫరాలో అవంతరాలు వస్తున్నాయి.</p> <p>11.3 వ్యవసాయ ఫీడర్ల పర్యవేక్షణ జరుగుతుందా?</p> <p>11.4 వ్యవసాయానికి ఉచిత విద్యుత్ కనెక్షన్లలో జాప్యం. విద్యుత్ శాఖ కార్యాలయాల చుట్టూ తిరుగుతున్నా కనెక్షన్లు మాత్రం మంజూరు కావడం లేదు అని రైతులు చెబుతున్నారు. అద్దలైన 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.</p> | <p>11.1 పెరిగింది. తెలంగాణ రాష్ట్రం ఏర్పడినప్పుడు 2014 -15 వరకు 8,62,611 ఇప్పుడు 2021 -22 డిసెంబర్ -21 వరకు 13,14,653.</p> <p>11.2 వ్యవసాయానికి 24 గంటల నిరంతర విద్యుత్ సరఫరా చేయడం జరుగుతుంది మరియు స్థానిక సాంకేతిక సమస్యల కారణంగా కొన్ని ప్రదేశాలలో విద్యుత్తు అంతరాయం ఏర్పడింది.</p> <p>11.3 ప్రస్తుతం జరగడం లేదు కానీ డిస్కామ్లు అగ్రికల్చర్ ఫీడర్లను విభజించి, వాటికి మీటరింగ్ని అమర్చే స్కీమ్ను సిద్ధం చేసే పనిలో ఉన్నాయి.</p> <p>11.4 వ్యవసాయ విద్యుత్ కనెక్షన్లు విడుదలలో FIFO (ఫస్ట్ ఇన్ ఫస్ట్ అవుట్) పద్ధతిని పాటిస్తున్నాము</p> |
| 19 | <p><b>TSERC, Govt. and Process</b></p> <ol style="list-style-type: none"> <li><b>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</b></li> <li><b>2. The major regulatory functions of TSERC, like other ERCs, are licensing, setting</b></li> </ol>  | <p>TS Discoms are not in a position to make any definitive comments in this regard, as this query is pertaining to the Hon'ble Commission.</p>  |

|    |   |   |
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|    | <p>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.</p> <ol style="list-style-type: none"> <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> <li>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.</li> <li>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.</li> <li>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.</li> </ol> | <p>TS Discoms shall abide by the instructions given by the Hon'ble Commission.</p>  |
| 20 | <p><b>Prayer before the Commission</b></p> <ol style="list-style-type: none"> <li>1. To examine the ARR more rigorously and ask for additional information</li> <li>2. To direct DISCOMs to provide statistical data on excel sheets and avoid preparing pdf documents in image format.</li> <li>3. To take stringent action to bring down electrical accidents.</li> <li>4. To allow the objector to be heard in person before the Commission takes any decision on this application of the DISCOMs.</li> </ol>  | <p>TS Discoms are not in a position to make any definitive comments in this regard, as this query is pertaining to the Hon'ble Commission.</p> <p>TS Discoms shall abide by the instructions given by the Hon'ble Commission.</p> |



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22. **Murali Krishna**, S/o Venkataiah, H.No:4-72. 9<sup>th</sup> ward, Nijalapur(Village), Moosapet(Mandal),Mahabubnagar (Dist)-509380  
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162. **Madireddy Raji Reddy**, 20-160/1/1, R.B.NAGAR, Near Pochamma Temple, Shamshabad, RR District- 501218

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| 1     | <p>సమర్పణ భావంతో, నీతి, నిజాయితీతో పనిచేస్తున్న 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, పాన్పరాగ్ లాంటి జోలికి వెళ్లరు). దురలవాట్లు లేని, కష్టపడి పనిచేసే ఉద్యోగస్తులకు మేము కృతజ్ఞతా పూర్వక ధన్యవాదాలు తెలుపుతూ, వారిని ఆదరించి, అభినందించి, సన్మానించాలని కోరుతున్నాం.</p> | <p>TSSPDCL మేనేజ్మెంట్ సర్కిల్ స్థాయిలో అంకితం భావము మరియు నిజాయితీ గల ఉద్యోగుల ప్రయత్నాలను ఎల్లప్పుడూ ప్రోత్సహిస్తుంది. ప్రోత్సాహానికి చిహ్నంగా అవార్డులు మరియు రివార్డులు ఇవ్వబడతాయి</p> |

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| 2     | <p>NPDCL వారు విద్యుత్ (ప్రమాదాలకు గురయి మరణించిన కారణాలు సవివరంగా తెలిపారు. ప్రమాదానికి సరియైన కారణం గుర్తించినట్లయితే ప్రమాదాలను నివారించడానికి ఎక్కువ అవకాశం ఉంటుంది. (ట్రాన్స్ఫార్మర్ చెడిపోయిన సందర్భాలలో డిస్కమ్ సొంత వాహనాలలో రవాణా చేసిన వాటి సంఖ్య కూడా ఇచ్చారు. పై వివరాలు ఇచ్చినందుకు సి.ఎం.డి. గారితో పాటుగా, ఇతర అధికారులు, సిబ్బంది అందరికీ మా కృతజ్ఞతాపూర్వక ధన్యవాదాలు తెలుపుకుంటున్నాం.</p> | ----                     |

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| 3     | <p>వ్యవసాయ సర్వీసు కనెక్షన్లు కొరకు దరఖాస్తు పెట్టుకున్న రైతులచే ట్రాన్స్ఫార్మర్ (011కు గద్దె కట్టించడం పోల్స్ (ట్రాన్స్ఫోర్ట్ చేయడం జరుగుతుంది. అనుభవరాహిత్యముతో పోల్స్ రవాణా చేస్తున్న సందర్భంగా కామారెడ్డి జిల్లా, రామారెడ్డి మండలం, గిద్దె గ్రామంలో ఇద్దరు రైతులు మరణించడం జరిగింది. గతంలో సిద్ధిపేట మరియు వరంగల్ జిల్లాల్లోనూ 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 అధికారులపై తీసుకున్న</p> | <p>ఫెయిల్ అయిన ట్రాన్స్ఫార్మర్ల రవాణా నిమిత్తం SPM వెహికల్ మరియు సబ్ డివిజన్ వెహికల్ అందుబాటులో ఉంచి ఎక్కువ శాతం తరలించడం జరుగుతున్నది. కానీ కొన్ని సమయాలలో ట్రాన్స్ఫార్మర్ల ఫెయిల్యూర్స్ అధికమైనచో ఒకటి లేదా రెండు రోజుల జాప్యంతో ట్రాన్స్ఫార్మర్లను డిపార్ట్మెంట్ వెహికల్స్ ద్వారానే తరలించడం జరుగుతున్నది. అతి తక్కువ సందర్భాలలో వెహికల్ అందుబాటులో లేనిచో రైతులు తమ ఇష్టప్రకారమే ట్రాన్స్ఫార్మర్లను రవాణా చేయుచున్నారు. లొకేషన్ నుండి ఎస్పిఎం షెడ్కి విఫలమైన ఎజిఎల్ డిటిఆర్ రవాణా కు</p> |

16. **Manik Reddy s/o Linga Reddy**, Hno: 9-57/5c,sri ram nagar colony, shankar palli,R.R district  
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22. **Murali Krishna**, S/o Venkataiah, H.No:4-72. 9<sup>th</sup> ward, Nijalapur(Village), Moosapet(Mandal),Mahabubnagar (Dist)-509380  
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25. **G Vinod kumar**, H.No.1-2-234/37 SBH.Colony, Domal Guda, Hyderabad-500029  
27. **M Sreedhar Reddy**, 2-1-174/174, Flat No.504, Rajputh Residency, Nallakunta, Hyderabad  
28. **P Venkat Reddy**, D.No.1+10-1/213/95, Sri venkatapuram Colony, kushai guda, Secendrabad-500062  
29. **Donuru Ramu**, 2-1-174/175, Flat No.G2, Rajputh Residency, Nallakunta, Hyderabad - 500 044  
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31. **Bagya Latha**, 2-122/5, Rd No.5, Brindvan Colony, Are Pally, Karimnagar - 505 001  
162. **Madireddy Raji Reddy**, 20-160/1/1, R.B.NAGAR, Near Pochamma Temple, Shamshabad, RR District- 501218

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|       | చర్యలేమిటి? భవిష్యత్లో ఇలాంటివి జరగకుండా చూడవలెను.  | మరియు ఆరోగ్యకరమైన డిటిఆర్ తిరిగి అదే మండల పరిధిలో రవాణా చేయడానికి రూ.750/- రవాణా ఛార్జీలు మరియు ఇతర మండల్ అధికార పరిధిలో రవాణా చేయడానికి రూ.1000/- చెల్లించాలని యాజమాన్యం ఆదేశాలు జారీ చేసింది.   |
| 4     | వ్యవసాయ వినియోగదారునికి క్రొత్త connection ఇచ్చిన సందర్భాలలో ఉన్న శాంక్షన్లో ఉన్న మెటీరియల్కు, వాడిన మెటీరియల్ తేడాలు ఉంటున్నవి. కొన్ని సామానులు, వినియోగ దారులచే కొనిపిస్తున్నారు. దీనిపై పారదర్శకత అవసరం. వాడిన మెటీరియల్ | క్వాలిటీ కంట్రోల్ వింగ్ మరియు అడ్మినిస్ట్రేటివ్ స్టాఫ్ కాలేజ్ ఆఫ్ ఇండియా (ASCI) వ్యవసాయానికి ఎలక్ట్రికల్ కనెక్షన్ను విడుదల మరియు మెటీరియల్ మరియు పనుల యొక్క అమలును వాటి యొక్క నాణ్యత మరియు పరిమాణాన్ని నిర్ధారించడం కోసం తనిఖీలు చేస్తున్నారు |

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|       | ,శాంక్షన్ అయిన మెటీరియల్ List వినియోగదారునికి ఒక కాపీ ఇచ్చి సంతకం తీసుకోవాలి.<br>Periodical గా మెటీరియల్ వినియోగంపై 3 <sup>rd</sup> పార్టీ ఎంక్వైరీ జరిపించాలి.  |   |
| 5     | Regulation 4 Of 2013 ప్రకారంగా DTR” నిర్మాణ ఖర్చు Discom బాధ్యత అని ఉంది. వాస్తవంగా క్షేత్రస్థాయిలో Agricultural వినియోగదారుల అంచనా (Estimate) లో కలిపి ORC చెల్లించమని అంటున్నారు. Regulation 4 of 2013 అమలు చేయడం లేదు. కారణం తెలుపగలరు. | a) అంచనాలో హెచ్టి లైన్, ఎల్టి లైన్ మరియు డిటిఆర్ కూడా ఉన్నట్లయితే, ఒక్కో సేవకు రూ.70,000/- వరకు ఖర్చు TSSPDCL భరిస్తుంది మరియు అంతకు మించి మొత్తాన్ని (ORC ) ద్వారా అట్టి అదనపు మొత్తాన్ని వినియోగదారుడు చెల్లించాల్సి ఉంటుంది<br>b) కేవలం LT లైన్ ప్రమేయం మాత్రమే ఉన్నట్లయితే, ఒక్కో సేవకు |

16. **Manik Reddy s/o Linga Reddy**, Hno: 9-57/5c,sri ram nagar colony, shankar palli,R.R district  
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|-------|--|--|--|--|
|       |  | రూ.45,000/- వరకు ఖర్చు TSSPDCL భరిస్తుంది మరియు ఏదైనా (ORC-అవుట్ రైట్ కంట్రీబ్యూషన్) ఉంటే అదనపు మొత్తాన్ని వినియోగదారు చెల్లించాలి |  |  |
| 6     | Cat- V Agriculture కు సంబంధించిన 2020-21 సం॥ను మరియు 2021-22 సం॥ ఇప్పటి వరకు గడిచిన కాలానికి సంబంధించిన OCR circle wise వసూలు అయిన మొత్తం ఎంత? | సర్కిల్  | ఆర్థిక సంవత్సరం 2021-22<br>(రూ. రూపాయలు) | ఆర్థిక సంవత్సరం 2020-21<br>(రూ. రూపాయలు) |
|       |  | సైబర్పేటీ  | 2443532                                  | 439382                                   |
|       |  | గద్వాల   | 1337364                                  | 511439                                   |

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|       |                                     | హబ్బిగూడ                 | 689901     | 543146  |
|       |                                     | మహబూబ్ నగర్              | 3751756    | 356113  |
|       |                                     | మెదక్                    | 93652      | 80231   |
|       |                                     | మేడ్చల్                  | 524234     | 236799  |
|       |                                     | నాగర్ కర్నూల్            | 28396      | 2166027 |
|       |                                     | నల్గొండ                  | 15916428.5 | 4593    |
|       |                                     | రాజేంద్రనగర్             | 647851     | 537865  |
|       |                                     | సంగారెడ్డి               | 1295949.5  | 593029  |

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|       |                                     | సరూర్నగర్                | 799978      | 69316    |
|       |                                     | సిద్దిపేట                | 135427      | 452274   |
|       |                                     | సూర్యాపేట                | 3569979     | 749594   |
|       |                                     | వికారాబాద్               | 473805.89   | 315850   |
|       |                                     | వన పర్తి                 | 1507903     | 3626979  |
|       |                                     | యాదాద్రి                 | 2452644     | 1944867  |
|       |                                     | మొత్తం                   | 35668800.89 | 12627504 |



16. **Manik Reddy s/o Linga Reddy**, Hno: 9-57/5c,sri ram nagar colony, shankar palli,R.R district  
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22. **Murali Krishna**, S/o Venkataiah, H.No:4-72. 9<sup>th</sup> ward, Nijalapur(Village), Moosapet(Mandal),Mahabubnagar (Dist)-509380  
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25. **G Vinod kumar**, H.No.1-2-234/37 SBH.Colony, Domal Guda, Hyderabad-500029  
27. **M Sreedhar Reddy**, 2-1-174/174, Flat No.504, Rajputh Residency, Nallakunta, Hyderabad  
28. **P Venkat Reddy**, D.No.1+10-1/213/95, Sri venkatapuram Colony, kushai guda, Secendrabad-500062  
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| S.No.                | Summary of Objections / Suggestions  | Response of the Licensee  |                          |  |  |                 |                          |  |                          |         |          |         |     |         |  |  |  |                      |         |        |     |
|----------------------|--|---|--------------------------|--|--|-----------------|--------------------------|--|--------------------------|---------|----------|---------|-----|---------|--|--|--|----------------------|---------|--------|-----|
| 7                    | 2020-21 మరియు 2021-22 సం॥లకు 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 ఎంత బాకీ ఉన్నది ఎంత? | <p>ఆర్థిక సంవత్సరం వారీగా వ్యవసాయ విక్రయాలు (MUలో) మరియు వ్యవసాయ విక్రయాలకు వ్యతిరేకంగా ప్రభుత్వం నుండి పొందిన సబ్సిడీ ఈ క్రింది విధంగా ఉన్నాయి:</p> <table border="1"> <thead> <tr> <th>ఆర్థిక సంవత్సరం</th> <th>వ్యవసాయ విక్రయాలు (MUలో)</th> <th>ప్రభుత్వం నుండి పొందిన సబ్సిడీ (కోట్లలో)</th> <th>మిగులు సబ్సిడీ (కోట్లలో)</th> </tr> </thead> <tbody> <tr> <td>2020-21</td> <td>11744.84</td> <td>1130.48</td> <td>---</td> </tr> <tr> <td>2021-22</td> <td></td> <td></td> <td></td> </tr> <tr> <td>సెప్టెంబర్ 2021 వరకు</td> <td>5409.83</td> <td>565.24</td> <td>---</td> </tr> </tbody> </table> |                          |  |  | ఆర్థిక సంవత్సరం | వ్యవసాయ విక్రయాలు (MUలో) | ప్రభుత్వం నుండి పొందిన సబ్సిడీ (కోట్లలో) | మిగులు సబ్సిడీ (కోట్లలో) | 2020-21 | 11744.84 | 1130.48 | --- | 2021-22 |  |  |  | సెప్టెంబర్ 2021 వరకు | 5409.83 | 565.24 | --- |
| ఆర్థిక సంవత్సరం      | వ్యవసాయ విక్రయాలు (MUలో)   | ప్రభుత్వం నుండి పొందిన సబ్సిడీ (కోట్లలో)  | మిగులు సబ్సిడీ (కోట్లలో) |  |  |                 |                          |  |                          |         |          |         |     |         |  |  |  |                      |         |        |     |
| 2020-21              | 11744.84   | 1130.48   | ---                      |  |  |                 |                          |  |                          |         |          |         |     |         |  |  |  |                      |         |        |     |
| 2021-22              |  |   |                          |  |  |                 |                          |  |                          |         |          |         |     |         |  |  |  |                      |         |        |     |
| సెప్టెంబర్ 2021 వరకు | 5409.83  | 565.24  | ---                      |  |  |                 |                          |  |                          |         |          |         |     |         |  |  |  |                      |         |        |     |

16. **Manik Reddy s/o Linga Reddy**, Hno: 9-57/5c,sri ram nagar colony, shankar palli,R.R district  
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| S.No. | Summary of Objections / Suggestions   | Response of the Licensee  |
|-------|---|---|
| 8     | <p>కోర్టుల్లో PPAలకు సంబంధించిన కేసులు ఎన్ని ఉన్నాయి? Discom లెక్క ప్రకారం అదనపు (Excess)పేమెంట్ ఇచ్చినది ఎంత? వాటి స్థితి ఏమిటి? వాటికి సంబంధించిన వరకు న్యాయవాదులకు (Advocate లకు) 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</p> | <ul style="list-style-type: none"> <li>• PPAకి సంబంధించి కోర్టులో ఒక నంబర్ కేసు పెండింగ్లో ఉంది.లిక్విడేటెడ్ నష్టాలకు సంబంధించి జనరేటర్కు నోటీసు జారీ చేయబడింది. కేసు విచారణలో ఉంది.లైసెన్సుదారులు కేసును పరిష్కరించిన తర్వాత న్యాయవాది(ల)కి రుసుము చెల్లిస్తారు.</li> <li>• అదనపు చెల్లింపులకు సంబంధించి, జనరేటర్తో చేసిన PPA క్రింద ఉన్న నిబంధనల ప్రకారం ఇంధన బిల్లులకు తప్ప, ఇంతవరకు ఏ జనరేటర్కు అటువంటి చెల్లింపులు జరగలేదు. లైసెన్సుదారుల అనాలోచిత చర్యల కోసం లైసెన్సుదారులు కోర్టులను ఆశ్రయించిన</li> </ul> |

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|       | విజిలెన్స్ వారికి తగిన విచారణ కొరకు పంపించారా? తెలియజేయగలరు   | <p>సందర్భాలు లేవు.</p> <ul style="list-style-type: none"> <li>• లైసెన్సుదారుల అనాలోచిత చర్యల కోసం లైసెన్సుదారులు కోర్టులను ఆశ్రయించిన సందర్భాలు లేవు.</li> </ul>  |
| 9     | 6 నెలలు పైగా రూ. 50,000/- పైగా బిల్లు చెల్లించని ప్రభుత్వ, ప్రభుత్వేతర వర్జుల (జాబితా) List లుపెట్టినారు. చిన్న పరిశ్రమలు, చేతివృత్తుల 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 | <p>టారిఫ్ ఆర్డర్ నిబంధనల ప్రకారం CC బిల్ చెల్లింపు కోసం గడువు తేదీ నుండి 15 రోజులు గడువు ముగిసిన తరువాత వినియోగదారుడు చెల్లించని యెడల సరఫరా డిస్కోనెక్ట్ చేయబడుతుంది.</p> <p>ఇంకా గడువు ముగిసిన తర్వాత కూడా వినియోగదారుల నుండి మొత్తాలను వసూలు చేయకుండా జనరేటర్లకు చెల్లింపులు, TS ట్రాన్స్కోకు ట్రాన్స్మిషన్</p> |

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|       | 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. | ఛార్జీలు, ఉద్యోగుల ఖర్చు, R&M మరియు పరిపాలనా వ్యయం మొదలైనవాటిని చెల్లించడం డిస్కామ్ కు చాలా కష్టమని తెలియజేయడం జరుగుతుంది.<br>ఫార్మాట్-9, (ఎ), (బి) వివరాలు Annexure గా జతపరచడమైనది |
| 10    | ట్రాన్స్ఫార్మర్ ఫెయిల్ అయినప్పుడు గ్రామీణ కన్సూమర్స్ ను రిపేర్ సెంటర్లకు తీసుకు వస్తే గతంలో రవాణా ఛార్జీలు చెల్లిస్తాం అని తెలిపినారు. ఎన్నింటికి చెల్లించారు? Circle wise   | లోకేషన్ నుండి ఎస్పిఎం షెడ్ కి విఫలమైన ఎజిఎల్ డిటిఆర్ రవాణా కు మరియు ఆరోగ్యకరమైన డిటిఆర్ తిరిగి అదే మండల పరిధిలో రవాణా   |

16. **Manik Reddy s/o Linga Reddy**, Hno: 9-57/5c,sri ram nagar colony, shankar palli,R.R district  
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19. **J Sampath Kumar**, D.no : 9-6-22, Ram Nagar, Karimnagar  
20. **Thegala Srinivas Rao**, 7-206,Venkatapoor, Dist Mulugu 506352  
21. **K Sai Reddy**, 11-1-1815, Maruthi Nagar, Nizamabad - 503 002  
22. **Murali Krishna**, S/o Venkataiah, H.No:4-72. 9<sup>th</sup> ward, Nijalapur(Village), Moosapet(Mandal),Mahabubnagar (Dist)-509380  
23. **J Sri Ranga Rao**, D.No.2-2-18/18/7, D.D.Colony Hyderabad-500013  
24. **Dabba Ravi**, H.No.8-90, Jagga Sagar, Metpalli (Mdl) Jagityal, Telangana -505325  
25. **G Vinod kumar**, H.No.1-2-234/37 SBH.Colony, Domal Guda, Hyderabad-500029  
27. **M Sreedhar Reddy**, 2-1-174/174, Flat No.504, Rajputh Residency, Nallakunta, Hyderabad  
28. **P Venkat Reddy**, D.No.1+10-1/213/95, Sri venkatapuram Colony, kushai guda, Secendrabad-500062  
29. **Donuru Ramu**, 2-1-174/175, Flat No.G2, Rajputh Residency, Nallakunta, Hyderabad - 500 044  
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31. **Bagya Latha**, 2-122/5, Rd No.5, Brindvan Colony, Are Pally, Karimnagar - 505 001  
162. **Madireddy Raji Reddy**, 20-160/1/1, R.B.NAGAR, Near Pochamma Temple, Shamshabad, RR District- 501218

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|-------|---|--|
|       | వివరాలు ఇవ్వగలరు.   | చేయడానికి రూ.750/- రవాణా ఛార్జీలు మరియు ఇతర మండల్ అధికార పరిధిలో రవాణా చేయడానికి రూ.1000/- చెల్లించాలని యాజమాన్యం ఆదేశాలు జారీ చేసింది.                                      |
| 11    | CGRF విచారణలు కోవిడ్ నిబంధనలు పాటిస్తూ, క్షేత్రస్థాయిలో జరిపించాలి. అసలు CGRF అని ఫోరం ఉన్నదని మెజారిటీ వినియోగదారులకు తెలియదు. ఫోరం గురించి పలు విధాలుగా ప్రచారం చేయాలి. అన్ని Discom ఆఫీసులలో ప్రత్యేకంగా బోర్డులు ఏర్పాటు చేయాలి. కొన్ని ఫోరమ్లలో 4 <sup>th</sup> Member కు సరియైన గౌరవ స్థానం ఇవ్వడం లదు. | విచారణ సమయంలో అన్ని కోవిడ్ జాగ్రత్తలు తీసుకోబడ్డాయి. ఫోరమ్ ప్రచారం క్రమం తప్పకుండా జరుగుతుంది. నమోదైన మరియు పరిష్కరించబడిన కేసులు ప్రతి త్రైమాసికంలో TSERCకి సమర్పించబడతాయి. |

16. **Manik Reddy s/o Linga Reddy**, Hno: 9-57/5c,sri ram nagar colony, shankar palli,R.R district  
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162. **Madireddy Raji Reddy**, 20-160/1/1, R.B.NAGAR, Near Pochamma Temple, Shamshabad, RR District- 501218

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|       | <p>TSNPDCL, నిజామాబాద్ ఫోరం సమర్థవంతంగా నెలకు &amp; సార్లు విచారణ జరుపుతున్నారు. ఇది అభినందనీయం. హైకోర్టు కూడా కొన్ని రోజులు ప్రత్యక్ష విచారణ జరిపారు. TSSPDCL / TSNPDCL లోని నాలుగు ఫోరమ్లలో గత సం॥ ఎన్ని కేసులు నమోదు చేశారు. ఫోరంలలో ఎన్ని పరిష్కరించారు?</p> |  |
| 12    | <p>CGRF లో తీర్పు వచ్చిన తరువాత అట్టి పని సరియైన సమయంలో జరగడం లేదు. తీర్పు అమలు జరిగే ఏర్పాట్లు చేయాలి. అమలు చేయకుంటే Discom స్థాయిలో వారిపై చర్యలు</p>  | <p>CGRF జారీ చేసిన ఆదేశాలు అమలు చేయబడుతున్నాయి మరియు చీఫ్ జనరల్ మేనేజర్/Commercial ఆధ్వర్యంలో ఈ సమస్యలను</p> |

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25. **G Vinod kumar**, H.No.1-2-234/37 SBH.Colony, Domal Guda, Hyderabad-500029  
27. **M Sreedhar Reddy**, 2-1-174/174, Flat No.504, Rajputh Residency, Nallakunta, Hyderabad  
28. **P Venkat Reddy**, D.No.1+10-1/213/95, Sri venkatapuram Colony, kushai guda, Secendrabad-500062  
29. **Donuru Ramu**, 2-1-174/175, Flat No.G2, Rajputh Residency, Nallakunta, Hyderabad - 500 044  
30. **B Malla Reddy**, 110-28/1, Flat No.56/8, Rd No.1, Nagarjuna Nagar Colony, Kushaiguda, ECIL, Hyd  
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162. **Madireddy Raji Reddy**, 20-160/1/1, R.B.NAGAR, Near Pochamma Temple, Shamshabad, RR District- 501218

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|-------|--|---|
|       | తీసుకోవాలి. దీనిని ఒక ఉన్నతాధికారికి అప్పగించి, ఎప్పటికప్పుడు పనులు చేయించాలి.   | పర్యవేక్షిస్తున్నారు.   |
| 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 ల ద్వారా. Circle Wise ఎన్ని ఫిర్యాదులు స్వీకరించారు? ఎన్ని పరిష్కరించారు? SOP ప్రకారంగా విద్యుత్ | 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. |

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|       | <p>అంతరాయాన్ని (DTR Failure) ఇతర సేవలు సంబంధించి SOP సమయంలో పరిష్కారం చేయకుంటే డిస్కమ్ స్టాయిలో తీసుకుంటున్న చర్యలు ఏమిటి? Toll Free No. అజమాయిషీ చేసే అధికారుల ఫోన్ నెంబర్లు ఇవ్వగలరు. అన్ని విద్యుత్ A.E., A.D.E, D.E., S.E., Bill Collection Center మరియు సిటిజన్ సెంటర్లలో) CGRF అడ్డన్లు టోల్ ఫ్రీ నెంబర్లను వ్రాయించి, వాటిని ఉపయోగంలోకి తీసుకురావాలి. డిస్కమ్ ప్రాంతంలోని అన్ని బిల్ కలెక్షన్ సెంటర్లలో ఏ ప్రాంతపు బిల్లులనైనా తీసుకునే విధంగా</p> | <p>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.</p> |



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|-------|---|---|
|       | చర్యలు చేపట్టాలి.   |   |
| 14    | H.T. Category లో కాలనీలు, పంచాయతీలు, వాటికి సంబంధించిన క్యాటగిరీకి ఇంతకు ముందు రూ.లు 6.30పైగా ఉండేది. దానిని పెంచడానికి ప్రపోజల్ గా A.R.R.లో ప్రతిపాదించారు. అట్టి విభాగంలోనే గేటెడ్ కమ్యూనిటీకి సంబంధించినవి కూడా అందులోనే ఉన్నాయి. గేటెడ్ కమ్యూనిటీ కాని గృహాలు, అపార్ట్ మెంట్ లలోని ఫ్లాట్లు / మధ్య తరగతి గృహాలకు 300 యూనిట్స్ దాటితే అత్యధిక టారిఫ్ వర్తిస్తుంది. కానీ కోట్లాది రూ.లు | కాస్ట్ అఫ్ సర్వీస్ ప్రకారంగా వోల్టేజ్ వారీగా టారిఫ్ చార్జీలు నిర్ణయించడం జరుగుతుంది |

16. **Manik Reddy s/o Linga Reddy**, Hno: 9-57/5c,sri ram nagar colony, shankar palli,R.R district  
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19. **J Sampath Kumar**, D.no : 9-6-22, Ram Nagar, Karimnagar  
20. **Thegala Srinivas Rao**, 7-206,Venkatapoor, Dist Mulugu 506352  
21. **K Sai Reddy**, 11-1-1815, Maruthi Nagar, Nizamabad - 503 002  
22. **Murali Krishna**, S/o Venkataiah, H.No:4-72. 9<sup>th</sup> ward, Nijalapur(Village), Moosapet(Mandal),Mahabubnagar (Dist)-509380  
23. **J Sri Ranga Rao**, D.No.2-2-18/18/7, D.D.Colony Hyderabad-500013  
24. **Dabba Ravi**, H.No.8-90, Jagga Sagar, Metpalli (Mdl) Jagityal, Telangana -505325  
25. **G Vinod kumar**, H.No.1-2-234/37 SBH.Colony, Domal Guda, Hyderabad-500029  
27. **M Sreedhar Reddy**, 2-1-174/174, Flat No.504, Rajputh Residency, Nallakunta, Hyderabad  
28. **P Venkat Reddy**, D.No.1+10-1/213/95, Sri venkatapuram Colony, kushai guda, Secendrabad-500062  
29. **Donuru Ramu**, 2-1-174/175, Flat No.G2, Rajputh Residency, Nallakunta, Hyderabad - 500 044  
30. **B Malla Reddy**, 110-28/1, Flat No.56/8, Rd No.1, Nagarjuna Nagar Colony, Kushaiguda, ECIL, Hyd  
31. **Bagya Latha**, 2-122/5, Rd No.5, Brindvan Colony, Are Pally, Karimnagar - 505 001  
162. **Madireddy Raji Reddy**, 20-160/1/1, R.B.NAGAR, Near Pochamma Temple, Shamshabad, RR District- 501218

| S.No. | Summary of Objections / Suggestions  | Response of the Licensee |
|-------|--|--------------------------|
|       | <p>విలువైన విల్లాలు, గేటెడ్ కమ్యూనిటీలో ఉన్న కోట్లాది విలువైన ప్లాట్లలో నివసించే వారికి H.T.-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 యూనిట్కు 8 రూ.ల నుండి 11 రూ.లు చెల్లించాల్సి వస్తుంది. అదే గేటెడ్ కమ్యూనిటీలో ఉన్న వ్యాపార సంస్థలు అని,</p> |                          |

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162. **Madireddy Raji Reddy**, 20-160/1/1, R.B.NAGAR, Near Pochamma Temple, Shamshabad, RR District- 501218

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|-------|---|--------------------------|
|       | <p>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 కమిషనర్ వారిని కోరుతున్నాం. ఆరంతస్తుల భవనాల విద్యుత్</p> |                          |

16. **Manik Reddy s/o Linga Reddy**, Hno: 9-57/5c,sri ram nagar colony, shankar palli,R.R district  
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|       | <p>వినియోగం కన్నా బహుళ అంతస్తుల భవనాల వారు దాదాపు 6 నుండి 10 రెట్లు ఎక్కువ విద్యుత్ను వినియోగించి పర్యావరణానికి విఘాతం కలిగిస్తున్నారు. "</p>  |  |
| 15    | <p>పర్యావరణం కారణంగా ధర్మల్ విద్యుత్ 2023 వరకు కొంత మేరకు తగ్గించుకోవాల్సి ఉంది. దాని కొరకు తీసుకుంటున్న చర్యలు ఏమిటి? ప్రత్యేకంగా సోలార్ మన రాష్ట్రంలో 325 రోజులు అందుబాటులో ఉంటుంది. సోలార్ పైన గతంలో ఎస్.పి.డి.సి. ఎల్. చాలా అభివృద్ధి సాధించి అవార్డులు కూడా పొందారు. పర్యావరణాన్ని దృష్టిలో పెట్టుకొని, సంప్రదాయేతర</p> | <p>పునరుత్పాదక వనరుల నుండి డిస్ట్రిబ్యూషన్ లైసెన్సీ ప్రాంతంలో మొత్తం విద్యుత్ వినియోగంలో కొంత శాతాన్ని కొనుగోలు చేయాలనే లైసెన్సీల ఆదేశం (RPPO) ప్రకారం, లైసెన్సీలు దాని నిర్దేశించిన లక్ష్యాన్ని సాధించడానికి అటువంటి వనరుల నుండి విద్యుత్ను కొనుగోలు చేయడానికి బాధ్యత వహిస్తారు. అటువంటి మూలాల నుండి వినియోగం. ఈ ఆదేశం విద్యుత్</p> |

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|       | <p>(Renewable) ఇంధనాలతో విద్యుత్ ఉత్పత్తికి ప్రోత్సాహమివ్వాలి ఉంది. దేశ వ్యాప్తంగా (గ్రీడ్ సౌకర్యం మెరుగు పడిన, పడుచున్న అవకాశాన్ని అందిపుచ్చుకొని దేశంలో ఎక్కడ తక్కువ ధరలకు లభ్యమవుతుందో అక్కడ కొనుగోలు చేయాలి</p> | <p>చట్టం, 2003 ప్రకారం SERC ద్వారా నిర్దేశించబడింది</p> <p>పునరుత్పాదక వనరుల నుండి నిర్దేశించబడిన లక్ష్య వినియోగాన్ని సాధించడానికి, లైసెన్సీలు అటువంటి వనరుల నుండి కనీసం ఖర్చుతో విద్యుత్ సేకరణ కోసం నిరంతర శోధనలో ఉన్నారు.</p> <p>SERC యొక్క పై ఆదేశానికి అనుగుణంగా, రాష్ట్రంలోని లైసెన్సీలు దేశవ్యాప్తంగా అందుబాటులో ఉన్న పునరుత్పాదక విద్యుత్ను కొనుగోలు చేయడానికి సమ్మతిని సమర్పించారు, ప్రభుత్వ ఆధ్వర్యంలో నడిచే SECI</p> |

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|-------|---|--|
|       |   | <p>ద్వారా వివిధ బిడ్డింగ్లు జరిగాయి మరియు కొన్ని విద్యుత్ సేకరణ ఒప్పందాలు (PSAs/PUAs) చేయబడ్డాయి మరియు వాటిలో కొన్ని ఒప్పందాలు ముందస్తు దశ/ఫైవ్ లైన్ అమలులో ఉన్నాయి.</p> |
| 16    | <p>బస్ స్టాండ్, రైల్వే స్టేషన్ల సరసన ఎయిర్ పోర్ట్ ను చేర్చారు. బస్ స్టాండ్లు, రైల్వే స్టేషన్ లో టీలు, తినుబండారాలు, ఇతర వస్తువులు రేట్లు మరియు స్టేషన్ సర్వీస్ చార్జీలు అతి స్వల్పం. ఎయిర్ పోర్ట్ లో టీ రూ. 200/- పైగా ఉంటుంది. అలా అన్నింటికీ ఎక్కువ ధరలే వసూలు చేస్తుంటారు. ఎయిర్ పోర్ట్ నిర్వహణ కొరకు ప్రతీ ఎయిర్ టికెట్ పైన కొంత చార్జీ</p> | <p>గౌరవనీయ కమిషన్ ఆమోదించిన ప్రకారం విద్యుత్ వినియోగ ఉద్దేశం ఆధారంగా టారిఫ్ వర్గీకరణ జరుగుతుంది.</p>   |

16. **Manik Reddy s/o Linga Reddy**, Hno: 9-57/5c,sri ram nagar colony, shankar palli,R.R district  
17. **Vijay gopala Rao**, # 10-1-99/3/3, Vujjini Nilayam, Street No.3, Bhagyanagar Colony, Saroor nagar, Hyderabad- 500035  
18. **Paryada Anji Reddy**, Gollapally, Kondapur (Mdl), Sangareddy  
19. **J Sampath Kumar**, D.no : 9-6-22, Ram Nagar, Karimnagar  
20. **Thegala Srinivas Rao**, 7-206,Venkatapoor, Dist Mulugu 506352  
21. **K Sai Reddy**, 11-1-1815, Maruthi Nagar, Nizamabad - 503 002  
22. **Murali Krishna**, S/o Venkataiah, H.No:4-72. 9<sup>th</sup> ward, Nijalapur(Village), Moosapet(Mandal),Mahabubnagar (Dist)-509380  
23. **J Sri Ranga Rao**, D.No.2-2-18/18/7, D.D.Colony Hyderabad-500013  
24. **Dabba Ravi**, H.No.8-90, Jagga Sagar, Metpalli (Mdl) Jagityal, Telangana -505325  
25. **G Vinod kumar**, H.No.1-2-234/37 SBH.Colony, Domal Guda, Hyderabad-500029  
27. **M Sreedhar Reddy**, 2-1-174/174, Flat No.504, Rajputh Residency, Nallakunta, Hyderabad  
28. **P Venkat Reddy**, D.No.1+10-1/213/95, Sri venkatapuram Colony, kushai guda, Secendrabad-500062  
29. **Donuru Ramu**, 2-1-174/175, Flat No.G2, Rajputh Residency, Nallakunta, Hyderabad - 500 044  
30. **B Malla Reddy**, 110-28/1, Flat No.56/8, Rd No.1, Nagarjuna Nagar Colony, Kushaiguda, ECIL, Hyd  
31. **Bagya Latha**, 2-122/5, Rd No.5, Brindvan Colony, Are Pally, Karimnagar - 505 001  
162. **Madireddy Raji Reddy**, 20-160/1/1, R.B.NAGAR, Near Pochamma Temple, Shamshabad, RR District- 501218

| S.No. | Summary of Objections / Suggestions   | Response of the Licensee |
|-------|---|--------------------------|
|       | <p>ఉంటుంది. ఎయిర్పోర్ట్లో పలు విదేశీ మద్యం షాప్లు, నగల షాప్లు, ఇతర దేశ, విదేశీ బ్రాండ్ల వస్తువులు అత్యధిక ధరలకు అమ్ముడయ్యే వస్తువులు ఉంటాయి. అడ్వర్టైజింగ్ వేరింగులు రాష్ట్రంలో ఎక్కడ ఏర్పాటు చేసినా యూనిట్కు 18 రూ.లు చెల్లించాలి. కానీ ఎయిర్పోర్ట్లో హోర్డింగులకు, వ్యాపార స్థలాలకు, షాప్లకు, స్టార్ వోటల్స్కు వాటికి సంబంధించిన క్యాటగిరీల క్రిందనే, ఎయిర్పోర్ట్ బయట టారిఫ్ ఎలా ఉందో, వీటికి కూడా టారిఫ్ను అలాగే నిర్ణయించాలి. ఏవియేషన్కు సంబంధించి సాంకేతిక మరియు</p> |                          |

16. **Manik Reddy s/o Linga Reddy**, Hno: 9-57/5c,sri ram nagar colony, shankar palli,R.R district  
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18. **Paryada Anji Reddy**, Gollapally, Kondapur (Mdl), Sangareddy  
19. **J Sampath Kumar**, D.no : 9-6-22, Ram Nagar, Karimnagar  
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25. **G Vinod kumar**, H.No.1-2-234/37 SBH.Colony, Domal Guda, Hyderabad-500029  
27. **M Sreedhar Reddy**, 2-1-174/174, Flat No.504, Rajputh Residency, Nallakunta, Hyderabad  
28. **P Venkat Reddy**, D.No.1+10-1/213/95, Sri venkatapuram Colony, kushai guda, Secendrabad-500062  
29. **Donuru Ramu**, 2-1-174/175, Flat No.G2, Rajputh Residency, Nallakunta, Hyderabad - 500 044  
30. **B Malla Reddy**, 110-28/1, Flat No.56/8, Rd No.1, Nagarjuna Nagar Colony, Kushaiguda, ECIL, Hyd  
31. **Bagya Latha**, 2-122/5, Rd No.5, Brindvan Colony, Are Pally, Karimnagar - 505 001  
162. **Madireddy Raji Reddy**, 20-160/1/1, R.B.NAGAR, Near Pochamma Temple, Shamshabad, RR District- 501218

| S.No. | Summary of Objections / Suggestions   | Response of the Licensee  |
|-------|---|---|
|       | ప్రయాణీకులు వేచి ఉండే గదులకు కూడా రైల్వే స్టేషన్, బస్ స్టేషన్ల టారిఫ్ కాకుండా, కమర్షియల్ టారిఫ్ను వర్తింపజేయాలి   |   |
| 17    | గతంలో మేము అడిగిన ప్రశ్నకు గౌరవ E.R.C. వారు వాస్తవ వినియోగాన్ని విభజించాలి అని ఆర్డరు జారీ చేశారు. దాని ప్రకారంగా ప్రస్తుతం రాజీవ్ గాంధీ ఇంటర్ నేషనల్ ఎయిర్పోర్ట్ (GMR) పరిధిలో ఉంటే మొత్తం రైతులు వద్ద సేకరించిన 5400 ఎకరాలలో ఎన్ని సర్వీసులు ఉన్నాయి? అవి ఏ క్యాటగిరి క్రింద ఉన్నాయి? వాటి వినియోగం ఎంత? వాటి | GMR ఎయిర్పోర్ట్లో ప్రస్తుతం ఉన్న సర్వీస్ కనెక్షన్లు<br>1) RJN-1145 HT-III,11000KVA, 220KV<br>2)RJN-2263, HT-I, 4000KVA, 33KV<br>3)RJN-2264, HT-II, 5000KVA, 33KV<br>4)RJN-1206, HT-II, 250KVA, 11KV |



16. **Manik Reddy s/o Linga Reddy**, Hno: 9-57/5c,sri ram nagar colony, shankar palli,R.R district  
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21. **K Sai Reddy**, 11-1-1815, Maruthi Nagar, Nizamabad - 503 002  
22. **Murali Krishna**, S/o Venkataiah, H.No:4-72. 9<sup>th</sup> ward, Nijalapur(Village), Moosapet(Mandal),Mahabubnagar (Dist)-509380  
23. **J Sri Ranga Rao**, D.No.2-2-18/18/7, D.D.Colony Hyderabad-500013  
24. **Dabba Ravi**, H.No.8-90, Jagga Sagar, Metpalli (Mdl) Jagityal, Telangana -505325  
25. **G Vinod kumar**, H.No.1-2-234/37 SBH.Colony, Domal Guda, Hyderabad-500029  
27. **M Sreedhar Reddy**, 2-1-174/174, Flat No.504, Rajputh Residency, Nallakunta, Hyderabad  
28. **P Venkat Reddy**, D.No.1+10-1/213/95, Sri venkatapuram Colony, kushai guda, Secendrabad-500062  
29. **Donuru Ramu**, 2-1-174/175, Flat No.G2, Rajputh Residency, Nallakunta, Hyderabad - 500 044  
30. **B Malla Reddy**, 110-28/1, Flat No.56/8, Rd No.1, Nagarjuna Nagar Colony, Kushaiguda, ECIL, Hyd  
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|-------|--|---|
|       | టారిఫ్ మరియు స్థిర చార్జీలు (Fixed) ఎంత తెలియజేయగలరని Discomలను కోరతూ గౌరవ కమిషన్ వారిని వాస్తవ వినియోగాన్ని మరియు వాటి ఆదాయాన్ని దృష్టిలో పెట్టుకొని టారిఫ్ నిర్ణయించి అమలు చేయించి, డిస్కంల ఆదాయాన్ని పెంచే ప్రయత్నం చేయాలని విన్నవించుకుంటున్నాం. | పైన పేర్కొన్నవి కాకుండా, విమానాశ్రయ విస్తరణ నిర్మాణ కార్యకలాపాల కోసం మరో రెండు తాత్కాలిక సేవలు అమలులో ఉన్నాయి<br>5)RJN-2159, HT-VII, 250KVA, 11KV<br>M/S.Larsen & Tubro Ltd<br>6)RJN-2228, HT-VII, 120KVA, 11KV<br>M/s.Balaji Infratech & Constructions Pvt Ltd |
| 18    | సెంట్రల్ విజిలెన్స్ కమిషన్ మరియు స్టేట్ విజిలెన్స్ కమిషన్కు సంబంధించిన చట్టాలు /   | TSSPDCLలో ఏవైనా అక్రమాలు/స్కామ్లను నివారించడానికి, ఉన్నతాధికారుల సూచనల మేరకు, ఇన్స్పెక్టర్లు & సబ్-ఇన్స్పెక్టర్లు మరియు సహాయక   |

16. **Manik Reddy s/o Linga Reddy**, Hno: 9-57/5c,sri ram nagar colony, shankar palli,R.R district  
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|       | <p>నిబంధనలను అనుసరించి విజిలెన్స్ను ఏర్పాటుచేసి, వినియోగదారుల పైనే గాకుండా డిస్కమ్, ట్రాన్స్కో, జెన్కోల అంతర్గత అవకతవకలపై కూడా నిఘా ఉంచాలి. ప్రస్తుతం సి.వి.సి. నిబంధనలకు విరుద్ధంగా కంపెనీలోని ఉన్నతాధికారులే విజిలెన్స్కు ఆధిపత్యం వహిస్తున్నారు. దీనిని చట్టబద్ధంగా చేయగలరని గౌరవ కమిషన్ వారికి విన్నవించు కుంటున్నాం.</p> | <p>సిబ్బందితో కూడిన చీఫ్ విజిలెన్స్ ఆఫీసర్/TSSPDCL నేతృత్వంలో విజిలెన్స్ వింగ్ ఏర్పాటు చేయబడింది. విజిలెన్స్ బృందం వినియోగదారులతో పాటు సంస్థలో పనిచేస్తున్న ఉద్యోగులపై విజిలెన్స్ విచారణను నిర్వహిస్తుంది. విజిలెన్స్ నివేదిక ఆధారంగా కార్పొరేట్ స్టాయిలో అక్రమార్కులపై తగిన చర్యలు తీసుకుంటున్నారు.</p> |

[26. koppanuri chennappa](#), S/o Sidhappa, shankerpally, Pin code 501203 ,RR District

| <b>S.No.</b> | <b>Summary of Objections / Suggestions</b>  | <b>Response of the Licensee</b>   |
|--------------|---|-----------------------------------|
|              | తమారితో చేయమనండి ఏమనగా నేను అనగా నందిపేట మశన్న S/o చిన్న నర్సింహ్ తమలు ( ట్రాన్స్ ఫార్మర్ ) వచ్చినవి కానీ వైర్లు ఇవ్వ లేదు DD నెం 2017 తాసు పరము దువె కోలి పోయిదు m టిశన్న భూమిలో ఉన్న తాసు పరము దగ్గర దువె పెద్ద లన్ తమరు ఒకటి ఇవ్వగలరు. | ఈ అంశం ట్రాన్స్కోకు సంబంధించినది. |

**32. Megha Engineering and Infra Structures, S-2, Technocrat Indl. Estate, Balanagar, Hyderabad - 500 037**

| 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 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</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> |

**32. Megha Engineering and Infra Structures, S-2, Technocrat Indl. Estate, Balanagar, Hyderabad - 500 037**

| <b>S.No.</b> | <b>Summary of Objections / Suggestions</b>   | <b>Response of the Licensee</b> |
|--------------|--|---------------------------------|
|              | <p>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> |                                 |

**33. Chandrachud D. Paliwal, Head Legal & Company Secretary, L & T Metro Rail Hyderabad, Mobile : 04022080000-01 Email: www.ltmetro.in**

| S.No. | Summary of Objections / Suggestions   | Response of the Licensee   |
|-------|---|--|
| 1     | <p><b>Inherent discrepancies in calculation of the tariff on 'cost to serve' basis:</b></p> <p><b>It is submitted that, the aforesaid proposal categorizing the Objector and levying the Cross Subsidy Charges or Additional Surcharge, Grid Support Charges which runs contrary to the Clause 6.4 of the Concession Agreement and Clause 8.9 of Detailed Project Report.</b></p> <p><b>It is further submitted that, the Aggregate Revenue Requirement (ARR) FY 2022-23 calculated COS for HT V (B) as Rs.5.09 at Clause 6.3.2 also runs contrary to the Retail Supply Order for Fy 2016-17 and 2017-18 and the directives issued by the Government of Telangana in Letter dated 27.04.2016 which clearly states that tariff for Hyderabad Metro HT V (B) HMR should be on Cost to Serve basis and if Open Access is availed by the Petitioner it shall be treated as captive power without levying Cross Subsidy Surcharge and/or Additional Surcharge.</b></p> | <p>TS Discoms wants to state that clause 6.4 of the concession Agreement mentions that "... in the event concessionaire receives a supply of electricity from any source other than area distribution company, it shall be deemed to be a supply from a captive power station....."</p> <p>The CSS and AS is not applicable when the supply is deemed to be taken from a captive power plant. Grid Support charges may be applied.</p> <p><b>However TS Discoms shall follow the regulations, policies etc. mentioned by the Hon'ble TSERC.</b></p> <p>TS Discoms believe that the calculated COS for HT V (B) as Rs.5.09 in ARR FY 2022-23 is inline with Hon'ble TSERC directions. The commission in Retail Tariff order for FY 2016-17 &amp; FY 2017-18 had directed TSSPDCL to study the consumption pattern for portion of commercial operation and propose a category COS. TS Discoms have calculated CoS as Rs. 5.09/unit and proposed a two part tariff accordingly.</p> |
| 2     | <p><b>It is pertinent to point out the Commission's view on Retail Supply Tariff Order for Fy 2016-17 and 2017-18 in relation to the Hyderabad Metro Rail (in short referred to as "HMR"):</b></p> <p><b>a) the excerpts from "Commission's view" Retail Supply Tariff Order for FY 2016-17 dated 23 rd June 2016:</b></p> <p><b>"Hence, the Commission opines that HMR is eligible to be classified under a separate category as has been done in Delhi. The commercial operation of the HMR is anticipated to be commenced during the year FY2016-17 covering only a limited area of operations"</b></p>  | <p>TS Discoms want to state that currently HMR is classified as a separate sub category and is having lower tariff than Indian Railways.</p>   |

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| <p>and at present its load constitutes construction and commercial loads. The Commission observes that the category cost of service cannot be ascertained at this stage and hence a sub-category can be created with lower tariff than that of the Indian Railways to accommodate the unique requirement of this category prior to major commercial operations. Meanwhile the Commission directs TSSPDCL to study the consumption pattern for the portion of the commercial operation to commence during the year FY 2016-17 and propose the Category CoS for the subsequent year.</p> <p>b) the excerpts from Retail Supply Tariff Order for FY 2017-18 dated 26th August 2017:</p> <p>"Commission's Ruling</p> <p><b>6.8.2 The Commission has introduced two-part tariff for HT V(B) category.</b></p> <p><b>6.8.3 The Commission has examined the proposal for fixing the energy charges to HMR Traction at Average Cost of Service (COS) and presents its reasoning as below:</b></p> <ul style="list-style-type: none"> <li>• <b>HMR is a public utility that will be engaged in the activities of providing mass rapid transit system for Hyderabad and benefits would be bestowed upon a section of travelling public. The integral part of its core operations are identified as follows:</b> <ol style="list-style-type: none"> <li>a. <b>Traction load.</b></li> <li>b. <b>Access pathways to station such as elevators, staircases (including escalators) and platforms used for the purposes of boarding the train.</b></li> <li>c. <b>Enabling areas such as ticket counters, stations office, operation/control rooms, depots and public washrooms located within the station premises (excluding areas allotted for vehicle parking). '</b></li> </ol> </li> </ul> <p>and</p> <p><b>"9.5 COST OF SERVICE OF HT V(B) HMR</b></p> <p><b>9.5.1 The Commission directs TSSPDCL to study the consumption pattern for the portion of energy likely to be consumed for the commercial operation (after commencement) of HMR Railway Traction out of the total energy to be consumed during FY 2017-18 and</b></p> | <p>In line with the commission directions TS Discoms have determined the COS for HMR HT V(B) category as Rs. 5.09/unit</p> <p>TS Discoms note the points mentioned by the objector. TS Discoms shall abide by the orders, regulations, policies</p> |
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|          | <p>propose the Cost of Service for the subsequent year so as to examine the same.</p> <p>c) the following letters from Government of Telangana to The Chairman and Managing Director, TSSPDCL, Hyderabad:</p> <p>i. Letter No. 1545/ Budget/2015-1 dated 16-03-2016 (enclosed):</p> <p>"From The Principal Secretary to Government Power Department, Telangana Secretariat to The Chairman &amp; Managing Director, TSSPDCL:</p> <p>For my consideration on the matter Government hereby accords permission for creation of separate category for Hyderabad Metro Rail System (excluding Real Estate Development portion) and fixation of the tariff as per the Clause 6.4 of the Concession Agreement. Accordingly, the Chairman and Managing Director TSSPDCL is hereby directed to file ARR with TSERC "on co basis" immediately and take necessary further action in the matter."</p> <p>The Letter dated 16-03-2016 is annexed herewith as "Annexure- 6".</p> <p>ii. Letter No.1545/Budget/2016 dated 27-04-2016.</p> <p>iii. Letter No. 149/ Budget/ 2017-1 dated 06-02-2017. The Letter dated 06-02-2017 is annexed herewith as "Annexure -7".</p> <p>iv. Letter No. 158/ Budget/ 2017-1 dated 06-02-2017. The said Letter dated 06-02-2017 is annexed herewith as "Annexure -8".</p> | <p>f Hon'ble TSERC</p>  |
| <p>3</p> | <p>All above points, i.e.,</p> <p>17 a) Retail Supply Tariff Order for FY 2016-17 dated 23 rd June 2016,</p> <p>17 b) Retail Supply Tariff Order for FY 2017-18 dated 26th August 2017, and 17 c) Government of Telangana directives to TSSPDCL &amp; TSERC clearly state that tariff for Hyderabad Metro HT V (B) HMR should be on Cost to Serve basis and if Open Access is availed by the Petitioner it shall be treated as captive power without levying Cross Subsidy Surcharge and/or Additional Surcharge.</p>  | <p>TS Discoms want to state that category Cost of Service calculated for HMR HT V(B) category in ARR FY 2022-23 is Rs. 5.09/unit.</p> <p>The proposed energy charges for the category is Rs. 4.95/unit which is well below than the category COS.</p> <p>TS Discoms wants to state that clause 6.4 of the concession Agreement mentions that "... in the event concessionaire receives a supply of electricity from any</p> |



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|   |  | <p>source other than area distribution company, it shall be deemed to be a supply from a captive power station....”<br/>The CSS and AS is not applicable when the supply is deemed to be taken from a captive power plant. Grid Support charges may be applied.</p> <p><b>However TS Discoms shall follow the regulations, policies etc. mentioned by the Hon’ble TSERC</b></p>   |
| 4 | <p><b>19. It is pertinent to submit here that:</b></p> <p><b>a. existing tariff of HT V(B) HMR ofRs. 3.95/ kVAh (energy charges) and Rs. 390/kVA/month (demand charges) actually at existing load factor for the period April 2021 to Dec 2021 works out to be Rs. 5.28/ unit (energy+demand+customer charges).</b></p> <p><b>b. The proposed tariff for HT V (B) HMR for FY 2022-23 of Rs. 4.95/ kVAh (energy charges) and Rs. 475/kVA/month (demand charges) shall work out to be Rs. 6.57/ unit (energy+demand+customer charges) at existing load factor.</b></p> <p><b>c. Hence, in line with COS calculation for HT V(B) of Rs. 5.09/ kWh as per clause 2 above, proposed tariff for HT V (B) should be reduce 3.75/ kVAh (energy charges) and maintained at Rs. 390 /kVA/month (demand charges).</b></p> <p><b>d. Also, direct TSSPDCL to allow Open Access to Petitioner treating it as captive power without levying Cross Subsidy Surcharge and/or Additional Surcharge in line with Clause 6.4 of Concession Agreement and Government of Telangana directives.</b></p> | <p>TS Discoms do not get the load curve for HMR category exclusively. Load curves help to determine the cost of service for each category effectively.</p> <p>Currently TS Discoms get 132 kV level load curves which are combined for commercial and metro categories. It does not represent the exclusive load curve of the metro category. Thus under this situation COS for HT 132 kV level could be considered which is Rs. 5.43/unit.</p> |
| 5 | <p><b>20. The Objectitioner submits that, the proposals made by TSSPDCL, in particular about cost of service, the same contains many discrepancies on the part of TSSPDCL, thereby the value of cost of service is getting escalated.</b></p> <p><b>a. Discrepancies of TSSPDCL brought out in Ministry of Power's (Gol) July 2021 publication- Ranking &amp; Ninth Annual Integrated Rating: State Distribution Utilities:</b></p> <p><b>i. High power purchase cost than the benchmark ii. High collection and payable days at</b></p>   | <p>TS Discoms would like to state the following reasons, for having a higher power purchase cost than the national benchmark -</p> <ul style="list-style-type: none"> <li>• Peak demand of Telangana has increased @ 10% CAGR in the last 6 years (from FY 15 to FY 21), compared to the national CAGR of 4% in the same duration.</li> </ul>   |

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| <p><b>142 days and 291 days respectively in FY 2020</b></p> <p><b>b. Discrepancies/ in components of Power Purchase Cost by TSSPDCL:</b></p> <p><b>i. High cost of power from TSGENCO at Rs. 4.88/ unit ii. D-D Sale of excess power at Rs. 3.42/ unit which was actually procured at cost of Rs. 4.77/ unit iii. Burden of Rs. 984 cr. on consumers for interest on pension bonds resulting in Re. 0.18/ unit</b></p> <p><b>From the above, It is clear that, the effect of aforesaid discrepancies are inherently built-in the proposed COS calculation of Rs. 5.09/ unit for HT V (B) HMR and thus, the same is highly objectionable and ought not to be accepted by the Hon'ble Commission.</b></p> <p><b>Report of the Ministry of Power's (Gol) is annexed here with Annexure-9</b></p> <p><b>b. Violations of Concession Agreement and Financial and Economic unviability of the HMR Project and Concession granted to the Petitioner</b></p> | <ul style="list-style-type: none"> <li>• In terms of the per-capita consumption, it has increased at a rate of 7% from FY 15 to FY 20, compared to the national rate of 3%.</li> <li>• As per the state govt. vision to supply 24 hrs power supply for farming sector, Discoms have been extending the 24x7 power supply to all Urban and Rural Areas including agricultural consumers from 01.01.2018 onwards. Telangana is the only state in the country supplying free Power for 24 hours to the Agriculture sector to ~25 Lakh agriculture pump sets in the state.</li> <li>• GoTS is also providing the subsidy, as directed by the Hon'ble Commission</li> <li>• 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). This may have resulted in a higher weighted average power purchase cost from RE sources. <ul style="list-style-type: none"> <li>○ 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.</li> </ul> </li> </ul> <p>TS Discoms will continue their best efforts to optimize their power purchase cost.</p> <p>TS Discoms would like to state that they have adopted the following steps to improve on the parameters of high collection and payable days –</p> |
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|  |  | <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> <li>• TS Discoms are preparing a scheme for installation of smart meters in a phased manner</li> </ul> <p>TS Discoms would like to clarify that the power purchase cost projections (including the interest on pension bonds) for TSGENCO, has been done based on the estimates prepared by TSGENCO, as part of their tariff filing submissions. TS Discoms would further abide by the instructions given by the Hon'ble Commission on the cost estimates for TSGENCO.</p> <p>On the D-D Sale rate of TSSPDCL, it is to be clarified that such rate has been arrived by taking into account the month-wise energy requirement and availability, and considering the variable costs of the marginal stations,</p> |
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|   |   | <p>catering to the quantum of such surplus/deficit for each Discom. The detailed workings have also been submitted to the Hon'ble Commission, as part of the Additional Information submission.</p>   |
| 6 | <p><b>It is also pertinent to submit the relevant terms of the concession agreement based on which the Hyderabad Metro Rail Project was developed is extracted hereunder:</b></p> <p><b>a. Clause 6.4 of the Concession Agreement that the erstwhile united Government of Andhra Pradesh (now Government of Telangana State) had entered into with the concessionaire, L&amp;T Metro Rail (Hyderabad)</b></p> <p><b>Limited:</b></p> <p><b>"6.4 Obligations relating to supply of electricity</b></p> <p><b>The Government shall procure that the Rail System gets priority in the supply of electricity from the grid and the tariff thereof shall be determined on commercial principles such that the Rail System is not required to subsidise any or all other segments of electricity consumers. The Government shall further procure that in the event the Concessionaire receives a supply of electricity from any source other than the area distribution company, it shall be deemed to be a supply from a captive power station under and in accordance with the provisions of Sections 9 and 42 of the Electricity Act, 2003. For the avoidance of doubt, this Clause 6.4 is not applicable to Real Estate Development.</b></p> <p><b>b. Clause 8.9 of the Detailed Project Report of Hyderabad Metro Rail Project, prepared by Delhi Metro Rail Corporation and accepted by erstwhile united Government of Andhra Pradesh:</b></p> <p><b>"The cost of electricity is a significant part of Operation and Maintenance charges of the Metro System, which constitutes about 25-35% of total annual working cost. Therefore, it is the key element for the financial viability of the Project. The annual energy consumption is assessed to be about 80 million units in initial years (2008) which will</b></p> | <p>TS Discoms wants to state that clause 6.4 of the concession Agreement mentions that "... in the event concessionaire receives a supply of electricity from any source other than area distribution company, it shall be deemed to be a supply from a captive power station...."</p> <p>The CSS and AS is not applicable when the supply is deemed to be taken from a captive power plant. Grid Support charges may be applied.</p> <p><b>However TS Discoms shall follow the regulations, policies etc. mentioned by the Hon'ble TSERC.</b></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 accordingly request the Hon'ble Commission to approve the same after due regulatory proceedings.</p> |

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|   | <p><b>double by horizon year 2021.</b></p> <p><b>In addition to ensuring optimum energy consumption, it is also necessary that the electric power be kept at a minimum in order to contain the O&amp;M costs. Therefore, the power tariff for Hyderabad Metro should be effective rate of purchase price (at 132 &amp; 33 KV voltage level) plus nominal administrative charges i.e. on a no profit no loss basis. This is expected to be in the range of Rs.2.50-3.00 per unit It is proposed that Government of Andhra Pradesh takes necessary steps to fix power tariff for Hyderabad Metro at "No Profit No Loss" basis. Similar approach has been adopted for Delhi Metro. "</b></p> <p><b>It is submitted that, the combined reading of Clause 6.4 of the Concession Agreement and Clause 8.9 of the Detailed Project Report of Hyderabad Metro Rail Project clearly demonstrates that financial viability of the project is very much depends on cost of energy.</b></p> | <p>TS Discoms understand that the cost of electricity is a significant part of Operation and Maintenance charges of HMR.</p> <p>The effective rate of power purchase at 132 kV/ 33 kV level is calculated as the category COS which is Rs. 5.09/unit for FY 20. The objector's understanding of this price to be in a range of Rs. 2.50 - Rs. 3.00 is not justified.</p> <p>Further TS Discoms request TSERC to consider providing additional Govt. Subsidy support if HMR tariffs are approved less than their category COS.</p> <p>TS Discoms shall abide by the orders of TSERC and Govt. of Telangana.</p>  |
| 7 | <p><b>It is submitted that, the Petitioner/Objecioner is engaged in the activities of providing Mass Rapid Transit System in the city of Hyderabad and is a public utility and social service sector project having many social benefits, which are bestowed upon a section of travelling public. In connection with the above activities, electricity is one of the important component in Operation &amp; Maintenance of Hyderabad Metro Rail.</b></p>  | <p>TS Discoms truly understand the responsibility of being a public utility and working in a social service sector. Having said that 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 accordingly request the Hon'ble Commission to approve the same after due regulatory proceedings.</p> |
| 8 | <p><b>It is submitted that unlike other consumers all infrastructure together with facilities, after interconnection point of TSTRANSCO/DISCOM system are established, maintained and operated by the Petitioner at its own cost and the TSTRANSCO/DISCOM do not incur any expenses for supply of power to Hyderabad Metro Rail. The Petitioner has established four Receiving Substations at various locations in proximity to Metro Rail</b></p>  | <p>No comments</p>  |

|        | System at its own cost. These receive power at 132KV. The onward distribution within Metro Rail System is done by the Petitioner, thus absorbing the losses (if any) incurred in the course of distribution & supply.   |  |             |                     |             |                     |  |  |  |  |  |   |
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| 9      | <p>It is also to be noted that unlike many other HT/EHT consumers of TSSPDCL, Hyderabad Metro Rail is a power intensive (25% to 35% of annual operations and maintenance cost) and social initiative and consequently a separate category was carved out by Hon'ble TSERC for the Petitioner, i.e. HT</p> <p>V (B). However the TSSPDCL, through the subject ARR proposed to increase Re.1/kVAh to all HT/EHT consumers. The said proposal infact defeats the objective of the HMR Project undertaken by the Petitioner and the purpose of creation of separate category to it by the Commission.</p>   | <p>TS Discoms understands that the HMR is a power intensive category and a social initiative. However the other point here to note is 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 accordingly request the Hon'ble Commission to approve the same after due regulatory proceedings.</p> |             |                     |             |                     |  |  |  |  |  |   |
| 10     | <p>It is further submitted that the ongoing pandemic of Covid'19 since March 2020 has resulted in 169 days complete shutdown of passenger services in 2020 for Petitioner and average daily footfall is still hovering around 25% of precovid scenario since resumption of passenger services. This has put immense pressure on the already loss-laden business of the Petitioner.</p> <p>Financials as below:</p> <table border="1" data-bbox="309 1060 1502 1258"> <thead> <tr> <th>Period</th> <th>FY 2018-19*</th> <th>FY2019-</th> <th>FY 2020-21@</th> <th>April 2021Dec 2021@</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table> | Period   | FY 2018-19* | FY2019-             | FY 2020-21@ | April 2021Dec 2021@ |  |  |  |  |  | <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> </ul> |
| Period | FY 2018-19*   | FY2019-  | FY 2020-21@ | April 2021Dec 2021@ |             |                     |  |  |  |  |  |   |
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|    | Losses (In Cr. INR)  | 148.14 | 382.20 | 1766.74 | 1399.07 | <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.</li> </ul> <p>Additionally TS Discoms are also facing a huge financial burden every year. Costs for Discoms are increasing, thus providing supply at same rate for many years does not seem a fair option.<br/>Further TS Discoms shall abide by the orders of TSERC and Govt. of Telangana.</p>   |
| 11 | <p><b>* Partial COD achieved during the year and losses during the project phase were capitalised.</b><br/> <b># Final COD of project achieved on 7th Feb 2020.</b><br/> <b>@ Includes CoVID impacted period and lockdown period.</b></p> <p><b>Furthermore, the proposed steep increase of Re.1/kVAh (energy charges) and Rs.85/MVA/month (demand charges) in tariff for HT V(B) HMR shall increase energy charges for Hyderabad Metro Rail by 25%, making Objectitioner one of the worst hit HT/EHT consumers. In view of the aforesaid facts, which reflects the loss running business of the petitioner, it is not possible to bear such costs by the Petitioner. If the proposed increase is accepted the cost of the same shall have to be passed on to the commuters of the HMR. Thus, the public interest is involved in this issue while considering the justification or otherwise of such proposed increase to HMR Project.</b></p> |        |        |         |         | <p>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.<br/>Hence, TS Discoms believe that the proposed tariff hike is inevitable and justified to improve its financial condition and accordingly request the Hon'ble Commission to approve the same after due regulatory proceedings.</p> <p>Alternatively, the TSERC may devise additional Govt. Subsidy requirement for HMR category so that the hike in electricity tariff is not passed on to the commuters of HMR.</p> |
| 12 | <p><b>The Petitioner further submits that, as stated above, the very conception of the HMR project is based on the terms of the concession and development agreement dated 04.09.2010, the relevant terms of the concession agreement consent to the power supply is extracted above. The said obligation upon the government clearly shows that, the power supply cost to the HMR is only limited to the cost of service incurred by the distribution company and no other charges including cross subsidy surcharge etc shall be fastened to</b></p>   |        |        |         |         | <p>TS Discoms wants to state that clause 6.4 of the concession Agreement mentions that "... in the event concessionaire receives a supply of electricity from any source other than area distribution company, it shall be deemed to be a supply from a captive power station....."</p>  |

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|    | the HMR  | The CSS and AS is not applicable when the supply is deemed to be taken from a captive power plant. Grid Support charges may be applied.  |
| 13 | <b>It is further submitted that, the second part of the condition related to the power supply in the concession agreement is that HMR shall be given necessary permissions, to procure power through open access, however such procurement shall be deemed to be a supply from captive power station.</b>  | <b>However TS Discoms shall follow the regulations, policies etc. mentioned by the Hon'ble TSERC.</b>  |
| 14 | <b>It is submitted that, Clause 8.9 of the detailed project report which is accepted by the Government clearly shows that, it is necessary that the electric power be kept at the minimum in order to curtail the O&amp;M cost and therefore the power tariff for the HMRL should be effective rate of purchase price at 132/KV level plus nominal administrative charges, without any profit or loss basis. Further, the DPR also contain that Government of Andhra Pradesh takes necessary steps to fix power tariff for HMR at no profit no loss basis.</b>   | 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.  |
| 15 | <b>It is submitted that, the petitioner has developed the project of HMR considering the aforesaid promises made by the government which is a contracting party to the Project Development Agreement (Concession Agreement). Therefore the petitioner has legitimate expectation on the aspect of the power supply in consonance to the aforesaid terms. In furtherance of the said obligation the Government of Telangana vide letter dated 27.04.2016 issued directives to this Hon'ble Commission purportedly under Section 108 of Electricity Act, 2003 to implement the said terms of the in deciding the Retail Supply Tariff to HMR project. It is also further submitted that, by considering the said directives, in the past this Hon'ble Commission has carved out and created separate category to determine the tariff for HMR.ermine the tariff for HMR.</b> | Hence, TS Discoms believe that the proposed tariff hike is inevitable and justified to improve its financial condition and accordingly request the Hon'ble Commission to approve the same after due regulatory proceedings.<br><br>TS Discoms understand that the cost of electricity is a significant part of Operation and Maintenance charges of HMR.<br>Further TS Discoms request TSERC to consider providing additional Govt. Subsidy support if HMR tariffs are approved less than their category COS.<br>TS Discoms shall abide by the orders of TSERC and Govt. of Telangana. |
| 16 | <b>Therefore, the proposal of TSSPDCL/Applicant to the energy charges and demand charges in tariff for HT V(B) HMR shall increase energy charges for Hyderabad Metro Rail by 25% is highly objectionable and ought not to be accepted by the Hon'ble Commission.</b>   |  |
| 17 | <b>Objections to levy of Grid Support Charges, Cross-Subsidy Charge and Additional</b>   | The CSS and AS is not applicable when the supply is deemed to be taken from a captive power plant. Grid  |



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|    | <p><b>Surcharge</b></p> <p><b>It is submitted that as detailed above, a separate category was carved out by the Government and the Hon'ble TSERC for the Petitioner, i.e. HT V (B) and thus, any levy of Grid Support Charges, Cross-Subsidy Charges and Additional Surcharge runs contrary to the same and is a violation of the Concession Agreement (clause 6.4 and 8.9)</b></p>  | <p>Support charges may be applied.</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. 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>   |
| 18 | <p><b>As far as the proposed Grid Support Charges is concerned it is submitted that, the object and purpose to levy such charges shall be limited to the projects who have Co-Generation or who are having Captive Power Generation together with their processing unit. The judgment of the Hon'ble Supreme Court in Civil Appeal No. 4569 of 2003 is only in respect to the aforesaid category of projects. Therefore, by any stretch of imagination HMR project cannot be fastened with Grid Support Charges even if it procures power through open access for a simple reason that, HMR would not fall within aforesaid two categories.</b></p>  | <p>TS Discoms want to state that Grid Support charges are been levied on:</p> <p>“Persons operating Captive Power Plants (CPPs) in parallel with T.S. Grid has 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> |
| 19 | <p><b>Without prejudice to the aforesaid contentions, even on merits the HMR should not be fastened with Grid Support Charges for following reasons:</b></p> <p><b>a. it is a green initiative and should be incentivised instead of being subjected to such regressive charges;</b></p> <p><b>b. with only 17-18% plant load factor, the impact of total installed solar captive plants in Telangana on TSSPDCL's health as brought out in tariff proposal is negligible;</b></p> <p><b>c. Precedence to reject the levy of such charges should be taken from The Maharashtra Electricity Regulatory Commission (MERC) which has decided not to impose any grid support charges on rooftop solar installations until the state achieves</b></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>   |

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|    | <p>solar rooftop capacity of 2,000 megawatts (MW).</p> <p>Also, if in future such grid support charges be allowed to be levied on TSSPDCL consumers must happen prospectively for upcoming projects and not for existing operational projects as it shall otherwise completely erode the financial viability of the projects.</p>  |   |
| 20 | <p>The Petitioner submits that, considering the terms and conditions of the Concession Agreement to which government being a contracting party, any additional liability of Tariff to HMR in view of the directives dated 27.04.2016 given by the Government of Telangana, as per Section 65 of Electricity Act, 2003 such additional burden if any shall be governed by the Government by way of granting subsidy, since it has issued such directives under Section 108 of the Electricity Act, 2003</p>   | <p>TS Discoms shall abide by the orders of TSERC and Govt. of Telangana</p> |
| 21 | <p>Furthermore, even as per the terms of the Concession Agreement and as described above, the DISCOMS are to grant open access as and when Petitioner/Objecioner approaches with such request, but without levying the</p> <p>Grid Support Charges, Cross Subsidy Surcharge or Additional Surcharge as the Petitioner does not fall under any of the categories entitling the DISCOMs to levy such charges.</p>  |   |
| 22 | <p>It is also submitted that, any deviation from the commitments given by the Government of Andhra Pradesh (now Government of Telangana State) through the Concession Agreement in respect of the power supply the same will hit by the Doctrine of Promissory Estoppel. Therefore, the Petitioner/Objecioner requests the Hon'ble Commission to consider the directives of the Government of Telangana stated through letter dated 27.04.1016 and retain the earlier tariff without any further escalation on any ground. It is submitted in this context, the law laid relating to Promissory Estoppel as laid down by the Hon'ble Supreme Court in Motilal Padampat Sugar Mills Co. Ltd. v. State of U.P., reported in (1979) 2 SCC 409 is extracted hereunder:</p> <p>"24. This Court finally, after referring to the decision in the Ganges</p> | <p>TS Discoms shall abide by the orders of TSERC and Govt. of Telangana</p> |

**Manufacturing Co. v. Sourujmull, Municipal Corporation of the City of**

**Bombay v. Secretary of State for India and Collector of Bombay v. Municipal Corporation of the City of Bombay summed up the position as follows:**

**'Under our jurisprudence the Government is not exempt from liability to carry out the representation made by it as to its future cannot on some undefined and undisclosed ground of necessity or expediency fail to carry out the promise solemnly made by it, nor claim to be the Judge of its own obligation to the citizen on an ex parte appraisal of the circumstances in which the obligation has arisen.**

**The law may, therefore, now be taken to be settled as a result of this decision, that where the Government makes a promise knowing or intending that it would be acted on by the promisee and, in fact, the promisee, acting in reliance on it, alters his position, the Government would be held bound by the promise and the promise would be enforceable against the Government at the instance of the promisee, notwithstanding that there is no consideration for the promise and the promise is not recorded in the form of a formal contract as required by Article 299 of the Constitution. It is elementary that in a republic governed by the rule of law, no one, howsoever high or low, is above the law. Everyone is subject to the law as fully and completely as any other and the Government is no exception. It is indeed the pride of constitutional democracy and rule of law that the Government stands on the same footing as a private individual so far as the obligation of the law is concerned: the former is equally bound as the latter. It is indeed difficult to see on what principle can a Government, committed to the rule of law, claim immunity from the doctrine of promissory estoppel. Can the Government say that it is under no obligation to act in a manner that is fair and just or that it is not bound by considerations of "honesty and good faith"? Why should the Government not be held to a high "standard of rectangular rectitude while dealing with its citizens"? There was a time when the doctrine of executive necessity was regarded as sufficient justification for the Government to repudiate even its contractual obligations; but, let it be said to the eternal glory of this Court, this doctrine was emphatically negated in the Indo-Afghan Agencies case and the supremacy of the rule of law was established. It was laid down by this Court that the Government cannot claim to be immune from the applicability of the rule of promissory estoppel and repudiate a promise made by it on the ground that such promise**

may fetter its future executive action. If the Government does not want its freedom of executive action to be hampered or restricted, the Government need not make a promise knowing or intending that it would be acted on by the promisee and the promisee would alter his position relying upon it. But if the Government makes such a promise and the promisee acts in reliance upon it and alters his position, there is no reason why the Government should not be compelled to make good such promise like any other private individual. The law cannot acquire legitimacy and gain social acceptance unless it accords with the moral values of the society and the constant endeavour of the Courts and the legislature, must, therefore, be to close the gap between law and morality and bring about as near an approximation between the two as possible. The doctrine of estoppel is a significant judicial contribution in that direction. But it is necessary to point out that since the doctrine of promissory estoppel is an equitable doctrine, it must yield when the equity so requires. If it can be shown by the Government that having regard to the facts as they have transpired, it would be inequitable to hold the Government to the promise made by it, the Court would not raise an equity in favour of the promisee and enforce the promise against the Government. The doctrine of promissory estoppel would be displaced in such a case because, on the facts, equity would not require that the Government should be held bound by the promise made by it. When the Government is able to show that in view of the facts as have transpired since the making of the promise, public interest would be prejudiced if the Government were required to carry out the promise, the Court would have to balance the public interest in the Government carrying out a promise made to a citizen which has induced the citizen to act upon it and alter his position and the public interest likely to suffer if the promise were required to be carried out by the Government and determine which way the equity lies. It would not be enough for the Government just to say that public interest requires that the Government should not be compelled to carry out the promise or that the public interest would suffer if the Government were required to honour it. The Government cannot, as Shah, J., pointed out in the Indo-Afghan Agencies case, claim to be exempt from the liability to carry out the promise "on some indefinite and undisclosed ground of necessity or expediency", nor can the Government claim to be the sole Judge of its liability and repudiate it "on an ex parte appraisal of the circumstances". If the Government wants to resist the liability, it will have to disclose to the Court what are the facts and circumstances on account of which the Government claims to be exempt from the liability and it would be for the Court to decide whether

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|    | <p>those facts and circumstances are such as to render it inequitable to enforce the liability against the Government. Mere claim of change of policy would not be sufficient to exonerate the Government from the liability: the Government would have to show what precisely is the changed policy and also its reason and justification so that the Court can judge for itself which way the public interest lies and what the equity of the case demands. It is only if the Court is satisfied, on proper and adequate material placed by the Government, that overriding public interest requires that the Government should not be held bound by the promise but should be free to act unfettered by it, that the Court would refuse to enforce the promise against the Government. The Court would not act on the mere ipse dixit of the Government, for it is the Court which has to decide and not the Government whether the Government should be held exempt from liability. This is the essence of the rule of law, The burden would be upon the Government to show that the public interest in the Government acting otherwise than in accordance with the promise is so overwhelming that it would be inequitable to hold the Government bound by the promise and the Court would insist on a highly rigorous standard of proof in the discharge of this burden. But even where there is no such overriding public interest, it may still be competent to the Government to resile from the promise "on giving reasonable notice, which need not be a formal notice, giving the promisee a reasonable opportunity of resuming his position" provided of course it is possible for the promisee to restore status quo ante. If, however, the promisee cannot resume his position, the promise would become final and irrevocable. Vide Emmanuel Avodeji Ajaye v. Briscoe [(1964) 3 All ER 556 : (1964) 1 WLR 1326].</p> |   |
| 23 | <p>It is submitted that, the petitioner has developed the project of HMR considering the aforesaid promises made by the government as under the Concession Agreement and otherwise that the electricity tariffs would be imposed on the Petitioner on a no profit no loss basis. Therefore the petitioner has legitimate expectation on the aspect of the power supply in consonance to the aforesaid terms. In furtherance of the said obligation the Government of Telangana vide letter dated 27.04.2016 issued directives to this Hon'ble Commission purportedly under Section 108 of Electricity Act, 2003 to implement the said terms of the Concession Agreement in deciding the Retail Supply Tariff to HMR project. It is also further submitted that, by considering the said directives, in the past this Hon'ble Commission has carved out and created separate category to determine the tariff for HMR.</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. Hence, TS Discoms believe that the proposed tariff hike is inevitable and justified to improve its financial condition and accordingly request the Hon'ble Commission to</p> |

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|    |  | <p>approve the same after due regulatory proceedings.</p> <p>Further TS Discoms request TSERC to consider providing additional Govt. Subsidy support if HMR tariffs are approved less than their category COS.</p> <p>TS Discoms shall abide by the orders of TSERC and Govt. of Telangana.</p> |
| 24 | <p><b>It is submitted that any deviation from the commitments given by the Government of Andhra Pradesh (now Government of Telangana State) through the Concession Agreement in respect of the power supply the same will hit by the Doctrine of Promissory Estoppel. Therefore, the Petitioner/Objectioner requests the Hon'ble Commission to consider the directives of the Government of Telangana stated through letter dated 27.04.1016 and retain the earlier tariff without any further escalation on any ground.</b></p>   | <p>TS Discoms shall abide by the orders of TSERC and Govt. of Telangana</p>   |
| 26 | <p><b>It is submitted that the Petitioner reserves its right to add, amend, alter, delete or otherwise substitute all or any of the grounds aforesaid, which are without prejudice to one another. It is further submitted that, since the Annexure Nos.</b></p> <p><b>1, 2, 4, 5 &amp; 9, being the Concession Agreement, Detailed Project Report, Tarif Orders and Niti Aayog Report, all the aforesaid Annexures are bulky in nature and are within the public domain, as such only relevant pages where the Objectioner is concerned only those pages are being filed and the Objectioner undertakes to file the complete document as and when the Hon'ble Commission directs the Objectioner to file.</b></p> | <p>TS Discoms shall abide by the orders of TSERC and Govt. of Telangana</p>   |
|    | <p><b>PRAYER - RELIEFS SOUGHT</b></p> <p><b>In view of the above-mentioned facts and circumstances, it is therefore prayed that this Hon'ble Commission may be pleased to pass orders as under:</b></p> <p><b>a. In respect of the Retail Supply Tariff, the same may be In line with COS calculation for HT V(B) of Rs. 5.09/ kWh, and the proposed tariff for HT V (B) should be reduced to Rs. 3.75/ kVAh (energy charges) and maintained at Rs. 390 /kVA/month (demand charges);</b></p> <p><b>b. Direct TSSPDCL to allow Open Access to Petitioner treating it as captive power</b></p>   | <p>No comments</p>  |

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| <p><b>without levying Cross Subsidy Surcharge and/or Additional Surcharge in line with Clause 6.4 of Concession Agreement and</b></p> <p><b>Government of Telangana directive;</b></p> <p><b>c. Reject the proposed grid support charges made by TSSPDCL for captive generation of HMR Project;</b></p> <p><b>d. Kindly grant separate/ personal hearing to the Petitioner to put across its contentions; and</b></p> <p><b>e. pass necessary orders as may deem fit and necessary in the interest of the justice.</b></p> |  |
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**34. 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   |
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| 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.</p> <p>Hence, TS Discoms believe that the proposed tariff hike is inevitable and justified to improve its financial condition 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> |
| 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>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 changes 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. Having said that, TS Discoms make note of the references shared by</p>   |



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|   |  | the objector on the tariffs for EV, and shall abide by the directions given by the Hon'ble Commission, as it deems fit.  |
| 3 | <b>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</b>  | TS Discoms make a note of the request raised by the objector and try to release the connection to PCS as early as possible.<br>TS Discoms shall abide by the directions given by the Hon'ble Commission.   |
| 4 | <b>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.</b> | 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.<br><br>TS Discoms shall abide by the directions given by the Hon'ble Commission. |

**35. [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   |
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| 1     | <p><b>Policy incentives are de-railed by the tariff proposal</b></p> <p><b>The Government of India along with the State Government has proposed an empirical study on the growth of the use of EV transportation and consequently the need of infrastructure to facilitate the same. Accordingly, both the Government of India and the State Government have come up with a policy decision to incentivise the industry of EV (both transportation and infrastructure). Notably, under the said policies, the EV infrastructure developer has to be incentivised. The policies promise that incentives shall be made available for Manufacturing of Electric Vehicles, Energy Storage Systems &amp; related components in Telangana. Incentives shall include Capital Subsidies, SGST reimbursements, power tariff subsidies, etc</b></p> <p><b>Noticeably, while the policy laid by the government was issued as late as in 2020, no implementation step has been taken to incentivise the EV infrastructure developer. It has to be appreciated that while considering any tariff determination for this category, the demand load and expected revenue has to be considered. There cannot be any occasion for estimating a growth rate of 10% of the sector, while on ground the implementation is far from reality.</b></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>TS Discoms want to state that many EVCS have been developed by REIL, NTPC etc providers with/ without support of Central and State level schemes. Recently there was an order determining landed tariff for EVCS @ Rs. 12.06/unit in Telangana. Additionally, TS Discoms have made efforts to identify and provide their land around substations to install EVCS on rental basis.</p> <p>The 10% growth for EV category sales was considered on nominal basis. Since historical EV sales data not available and difficulty in predicting the future sales, a nominal growth of 10% is assumed.</p> |

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| <p><b>TSSPDCL tariff proposal contrary to the intent and spirit affirmed by the Hon'ble TSERC</b></p> <p><b>This Hon'ble Commission by way of its previous orders has protected the fate of EV infrastructure developer by laying down that instead of two-part tariff, there would a single part tariff that shall be applicable for EV Charging Stations. Such decision of this Hon'ble Commission was based on the fact that EV Charging Stations since will not have a demand right away and as per the State Policy are required to incentivised, the burden of fixed tariff cannot be placed upon the EV infrastructure developer. However, as evident from the tariff petition filed by TSSPDCL, a proposal has been made</b></p> <p><b>as under:</b></p> <p><b>LT IX Electric Vehicle Charging station</b></p> <p><b>Proposed Tariffs</b></p> <ul style="list-style-type: none"> <li><b>o Energy charge – Rs.7.00/unit</b></li> <li><b>o Fixed charge – Introduction of Rs.50/kW/month.</b></li> </ul> <p><b>The Licensee proposes monthly minimum energy charges as follows:</b></p> <ul style="list-style-type: none"> <li><b>o Single phase – Rs.65/month.</b></li> <li><b>o Three Phase – Rs.200/month</b></li> </ul> <p><b>HT-IX: Electric Vehicle Charging Stations</b></p> <p><b>Proposed Demand charge – Introduction of Rs.100/kVA/month Proposed Energy charge – Rs.7.00/unit. The licensee proposes monthly minimum energy charges of 25 units per kVA of billing demand per month.</b></p> <p><b>Evidently, the above proposal is in teeth of the objective of the State Policy and previous decisions of this Hon'ble TSERC, basis which the developers like Fortum, have invested in the State. It is part of public knowledge that Fortum owns and operates approx 45 locations with fast chargers of 15/20/30 and/or</b></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.</p> <p>Hence, TS Discoms believe that the proposed tariff hike is inevitable and justified to improve its financial condition 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>TS Discoms want to state that the current proposed Energy changes 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. 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><b>50/60kW capabilities across 45 locations with esteemed partners Indian Oil Corporation, Hyderabad Metro, LT Metro, Chennai Silks, MG Motor India, AMPL. We are also operating a network on chargers on Hyderabad-Vijaywada highway. Therefore, the investment and the return thereon are required to be protected by this Hon'ble TSERC and the tariff consideration has to be made accordingly.</b></p>  |  |
|  | <p><b>Projections and Estimates under the Tariff Petition are arbitrary and lack basis.</b></p> <p><b>In terms of the tariff petition filed by TSSPDCL, it has been submitted that in H1 of FY21- 22, 1.25MU sales were recorded. Similarly, under Lt-Ix Electric Vehicle Charging Stations, 19 services with a load of 0.38MVA were released in FY20-21 recording consumption of 19502 units and 33 No.s services of 0.63MVA are released in H1 of FY21-22 with consumption of 27874 units.This has been concluded to presume that the a growth rate of 10% in estimating the sales for FY2021-22 and FY2022-23. Such assumptions are made without examining any empirical data and/or considering the current dynamics of the sector.</b></p> | <p>The 10% growth for EV category sales was considered on nominal basis. Since historical EV sales data not available and difficulty in predicting the future sales, a nominal growth of 10% is assumed.</p> |

**36. Rain Cements Ltd, Rain Center, 34, Srinagar Colony, Hyderabad - 500 073**

| S.No. | Summary of Objections / Suggestions   | Response of the Licensee   |
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| 1     | <p><b>HISTORY OF GRID SUPPORT CELARGES (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. I 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 ofAPTRANSCO.</p> <p>1. 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 Northern grid in Jan 2, 2001 and 230 million people were affected.</p> <p>1. 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>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 (<i>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</i>) 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 2004also supports Technically the application of Grid</p> |

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|   | <p><b>1. 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.</b></p>   | <p>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> |
| 2 | <p><b>THE IMPACT OF THE ELECTRICITY ACT, 2003:</b></p> <p><b>. 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.</b></p> <p><b>1. 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 2017, this Hon'ble Commission also notified Regulation No.4 of 2017 for forecasting, scheduling and deviation settlement.</b></p> <p><b>1. CPP's are exempt from the payment of CSS as per the 4<sup>th</sup> 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</b></p> |   |

**cogeneration sources be promoted.**

**1. 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.**

**1. 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(l) of the Act) as per the Regulations prescribed by the appropriate Commission.**

**1. 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 APSLDC was already approved in the MYT Tariff 2019-24. 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.**

**1. 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**

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

**Tariff proposal is to recover the retail supply business costs, the DISCOM has no role in proposing any GSC.**

**1. 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.**

**1. It is thus submitted that the proposal of the DISCOMs in proposing a levy of GSC is itself misconceived and patently without jurisdiction.**

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.

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.

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**



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|   |  | <p><b>Comparison of GSC with other states like Madhya Pradesh, Gujarat, Tamil Nadu, Chhattisgarh</b></p> <p>Consider GSC @ Rs. 25 / kVA / month<br/> Captive Capacity = 100 MVA = 100,000 kVA<br/> GSC (Rs. Cr.) = <math>25 * 100000 / 10^7</math><br/> = <b>Rs. 0.25 Cr. / month</b></p> <p><b>Thus GSC determined by TS Discoms is very much justifiable.</b></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>   |
| 3 | <p><b>THE CONCEPT OF AVAILABILITY BASED TARIFF (ABT) (FREQUENCY BASED LINKED TARIFF):</b></p> <p><b>1. Prior to power sector reforms, the southern grid frequency was being maintained around 47.8 Hz to 48 Hz in order to meet load. If system is maintained at lower frequency, the motive power consumption would be less than the rated power of equipment. This is being done to reduce the motive load on the system and thus system demand.</b></p> <p><b>2. Now, due to implementation of frequency based tariff, levy of tariff for reactive power drawal, charges for deviations from schedules, the grid frequency is being maintained in the range between 49.90 to 50.05. In case of any deviations from schedules, penal charges are being levied as per the CERC (Deviation</b></p> | <p>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 &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 from parallel operation</p> |

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|   | <p><b>Settlement Mechanism and Related Matters) Regulations, 2014. Practically, the grid security is being maintained by SLDC/RLDC/NLDC. Since the grid security is being maintained by SLDC/RLDC/NLDC, the DISCOMs are not entitled to levy Grid Support Charges on CPPs/Co-generation plants.</b></p>  | <p>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> |
| 4 | <p><b>WHO IS CONTRIBUTING TO GRID SUPPORT:</b></p> <p><b>Support for Grid is being provided by all Generators including APGENCO, IPPs, CPPs and Cogeneration Power Plants. The DISCOMs are in no way providing any Grid support. For example, if the system demand increases/decreases due to consumer requirement, the nearby generators will respond as per the system's requirement as per the directions of the SLDC.</b></p>  |  |
| 5 | <p><b>CHARGES PAID BY GENERATORS:</b></p> <p><b>1. All generators are paying demand charges (Capacity charges), reactive power charges as prescribed by the Commission or single part energy tariff which is around Rs. 12.25/unit for start-up and other purposes. This high single part tariff includes demand component also apart from variable charge. Apart from above tariffs, the CPP/Co-generation plants are also paying charges for deviation of schedules. This is being implemented to bring discipline among OA generators and OA Consumers, as specified in the relevant regulations and thereby the grid's stability and its equilibrium are maintained.</b></p> <p><b>2. The Commission also has approved kVAh tariff to maintain grid security, avoid voltage collapse, minimise reactive power drawal and thus minimise power loss. Due to levy of Reactive power</b></p> |  |

|  | charge/kVAh tariff, the system voltages are being maintained at optimum level which also helps in maintaining grid stability.  |   |                             |   |  |       |       |  |
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| 6  | <p><b>TSSLDC ARR TARIFF APPROVED IN MYT ORDER FY 2019-24 DT. 08.03.2019:</b></p> <table border="1"> <thead> <tr> <th>Description</th> <th>Approved in MYT ARR. Rs crs</th> <th>SLDC charges mentioned Notification. Rs crs</th> </tr> </thead> <tbody> <tr> <td>LDC charges (Capital Cost + eratin char es</td> <td>71.19</td> <td>69.82</td> </tr> </tbody> </table> <p>Levy of GSC on CPPs and Co-generation power plants is redundant as Generators are already paying Capacity charges, Deviation charges and reactive power charges (or kVAh tariff). Three types of charges i.e., Capacity charges (demand charges), Deviation charges and Reactive power charges (or kVAh tariff) are being levied and levying GSC again cannot be justified on same ground. Since the SLDC's ARR is already approved in the SLDC MYT tariff Order, there is no need to once again levy GSC, more so without any proposal or requirement shown by the SLDC,</p> | Description   | Approved in MYT ARR. Rs crs | SLDC charges mentioned Notification. Rs crs | LDC charges (Capital Cost + eratin char es | 71.19 | 69.82 |  |
| Description                                | Approved in MYT ARR. Rs crs  | SLDC charges mentioned Notification. Rs crs   |                             |   |  |       |       |  |
| LDC charges (Capital Cost + eratin char es | 71.19  | 69.82   |                             |   |  |       |       |  |
| 7  | <p><b>NATIONAL POLICIES AND CAPTIVE GENERATION:</b></p> <p>The relevant provisions of National Electricity Policy, 2005 are extracted hereunder:</p> <p><b>Captive Generation</b></p> <p><b>5.2.24</b> The liberal provision in the Electricity Act, 2003 with respect to setting up of captive power plant has been made with a view to not only securing reliable, quality and cost effective power but also to facilitate creation of employment opportunities through speedy and efficient growth of industry.</p> <p><b>5.2.25</b> The provision relating to captive power plants to be set up by</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>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> |                             |   |  |       |       |  |

group of consumers is primarily aimed at enabling small and medium industries or other consumers that may not individually be in a position to set up plant of optimal size in a cost effective manner. It needs to be noted that efficient expansion of small and medium industries across the country would lead to creation of enormous employment opportunities.

**5.2.26** A large number of captive and standby generating stations in India have surplus capacity that could be supplied to the grid continuously or during certain time periods. These plants offer a sizeable and potentially competitive capacity that could be harnessed for meeting demand for power. Under the Act, captive generators have access to licensees and would get access to consumers who are allowed open access. Grid inter-connections 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 the grid. Towards this end, non-conventional energy' sources including co-generation could also play a role. Appropriate commercial arrangements would need to be instituted between licensees and the captive generators for harnessing of spare capacity energy from captive power plants. The appropriate Regulatory Commission shall exercise regulatory oversight on such commercial arrangements between captive generators and licensees and determine tariffs when a licensee is the off-taker of power from captive plant.

The relevant extracts of the National Tariff Policy, 2016 are as under:

**5.12 f...]** In some cases, the duties etc. on consumption of electricity is linked to sources of generation (like captive generation) and the level of duties levied is much higher as compared to that being levied on the same category of consumers who draw power from grid. Such a distinction is invidious and inappropriate. The sole purpose of freely allowing captive generation is to enable industries to access

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|   | <p>reliable, quality and cost effective power. Particularly, the provisions relating to captive power plants which can be set up by group of consumers has been brought in recognition of the fact that efficient expansion of small and medium industries across the country will lead to faster economic growth and creation of larger employment opportunities. For realizing the goal of making available electricity to consumers at reasonable and competitive prices, it is necessary that such duties are kept at reasonable level.</p> <p><b>6.3 Harnessing captive generation</b> Captive generation is an important means to making competitive power available. Appropriate Commission should create an enabling environment that encourages captive power plants to be connected to the grid. T...]</p> <p><b>Wheeling charges and other terms and conditions for implementation should be determined in advance by the respective State Commission, duly ensuring that the charges are reasonable and fair</b></p> <p><b>As per both the National Electricity Policy and National Tariff Policy, an enabling environment and encouragement for both the establishment of, and consumption of power from CPP's is envisaged. The levy of GSC without any basis in the present day scenario would run contrary to the aforementioned policy directives.</b></p> |  |
| 8 | <p><b>No METHODOLOGY SPECIFIED:</b></p> <p><b>It is pertinent to note that RCCVL had established the co-generation power plant as per the mandatory requirement of Andhra Pradesh Pollution Control Board's norms and was not its choice but as per the condition imposed by GoAP to establish such a co-generation power plant to protect the environment from greenhouse gases and</b></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> |

to address its concerns on global warming. RCCVL is also exempt from the payment of CSS under S.42 of the Act in view of the Electricity [Removal of Difficulties] Second Order, 2005 dated 8.06.2005, exempting the levy of CSS for those generating companies who were allowed to sell power with the consent of the government granted in terms of Sec 43A(l)(c) of Electricity Supply Act, 1948.

It also is averred in the proposals that the levy of GSC is being sought in compliance of/pursuant to the Hon'ble Supreme Court's judgement. Such an averment is completely false as the Hon'ble Supreme Court merely affirmed the erstwhile Commission's order in levying GSC under the AP Electricity Reform Act, 1998, and did not give any direction, express or implied, to levy GSC.

1. Further, if any Co-generation Power Plant capacity is more than the inhouse plant consumption, such unit provides grid support by exporting power to the grid and does not take any support from the Grid. Such power plants must be excluded from levying GSC.

1. Even assuming that GSC is applicable, the DISCOMS have not specified the total CPP capacity in their proposals, and the impact such levy may have. Moreover, while arriving at the CPP capacity, auxiliary consumption capacity necessarily needs to be excluded alongwith the capacity that the CPP exports. There are various anomalies and ambiguities in the proposal made by the DISCOMS.

There is no information as to the formula or methodology intended to be adopted. Further, the DISCOMS had sought for retrospective determination of GSC, which is impermissible in both law and due to the fact that the DISCOMS have been recovering their ARR from the retail supply business every year as approved by this Hon'ble Commission.

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| <p><b>PRAYER:</b></p> <p><b>For the reasons mentioned above, we humbly request this Hon'ble Commission's to reject the contentions and claims filed by DISCOMs for levying GSC on RCCVL as being a Co-generator.</b></p> <p><b>Apart from the above, as the Levy of GSC being only under the purview of SLDC, with TSTRANSCO and DISCOMs having nothing to do with it, we pray that that the proposal to levy GSC by the DISCOMs may kindly be rejected by the Hon'ble Commission, as being made without jurisdiction.</b></p> <p><b>We also humbly request the Hon'ble Commission to grant us an opportunity to orally present our submissions during the hearings to be conducted on the approval Qf the ARR &amp; RST</b></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> <p>The entire network (LDC &amp; Transmission) cost of state excluding portion of open access portion is borne by the Distribution licensees only and said recovery of cost is under purview of the Distribution Licensees only.</p> |
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**37. Zuari Cements, Sitapuram Power Plant, Sitapuram, Dondapadu Village, Chintalapalem Mandal, Suryapet 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><b>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 find no fault in the same. Thus, the order of the Commission concerning the Grid Support Charges has to be upheld...</b></p> <p><b>The Hon'ble Supreme Court has upheld the Order of APERC considering</b></p> | <p>The levy of grid support charges is also a part of recovery of fixed</p> |



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|   | <p>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>  | <p>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> |
| 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 DondapaduTelangan 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>  | <p>No comments</p>   |
| 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:<br/>"10.1 Advantages to CPPs:<br/>(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.<br/>(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.<br/>(3) Negative phase sequence current is generated by unbalance loads. The</p> | <p>No comments</p>   |

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|   | <p>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 | <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><b>HISTORY OF GRID SUPPORT CHARGES (GSC):</b></p> <p>1. The Grid Support Charge (GSC) was initially levied by the erstwhile</p>  |             |

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|   | <p>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. I I .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 | <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</p>   |   |

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

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|   | <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> | <p>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 &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 from parallel operation need to compensate through Grid Support charges.</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 5.226 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</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>   |

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|   | <p>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 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 time 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 upto ~12% of the deviation charges in the case where a Generator or a Discoms deviates from their said drawal 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><b>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.</b></p> <p><b>1. CGPs absorb some amount of harmonics whereas a consumer without CGP inject full quantum of harmonics generated to the grid.</b></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>Grid Support charges computation example:<br/>Captive Capacity = 100 MVA = 100,000 kVA .....[a]</p>   |

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| <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 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 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</p> | <p>CMD with Distribution licensee = 90 MVA = 90,000 kVA.....[b]</p> <p>Differential capacity = [a-b] = 10 MVA = 10,000 kVA ....[c]</p> <p>GSC (Rs. Cr.) = c * 50% of Demand charges<br/> = 10000 * (50% of say Rs. 475) / 10<sup>7</sup><br/> = 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<br/> Captive Capacity = 100 MVA = 100,000 kVA<br/> GSC (Rs. Cr.) = 25 * 100000 / 10<sup>7</sup><br/> = 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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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 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 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 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.

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 perforce cease operations.

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.

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.

17. 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 /

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

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.

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

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.

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 CPT's.

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

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

| Name of the State | Grid Support Charges<br>Rs/KVA/Month |
|-------------------|--------------------------------------|
| Madhya Pradesh    | Rs.20/KVA/Month                      |
| Rajasthan         | Rs.20/KVA/Month                      |
| Gujarat           | Rs.26/KVA/Month                      |
| Tamilnadu         | Rs.30/KVA/Month                      |
|                   | Rs.16/- per kVA per month on the in: |
| 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

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>

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|    | excessive, arbitrary, and so requires to be reduced substantially and validated by an independent third-party analysis.   | = Rs. 0.25 Cr. / month<br>Thus GSC determined by TS Discoms is very much justifiable.  |
| 10 | 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 OERO has also appointed an independent third party for system study before determination of GSC. | 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 |
| 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   | The grid support charges methodology which was approved in   |

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|    | 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.  | Tariff Orders up to FY 2008-09 is adopted and proposed for the FY 2022-23.  |
| 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.  | 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.  |
| 15 | <p><b>PRAYER</b></p> <p>That, in view of the above, we pray that the Hon 'ble Commission may be graciously pleased to</p> <p>a) <b>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;</b></p> <p>b) <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;</b></p> <p>c) <b>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;</b></p> <p>d) <b>To hold the levy till the third-party analysis is completed to the satisfaction of the Hon'ble TSERC;</b></p> <p>e) <b>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</b></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>However, the full Bench of Tribunal in Appeal No. 120 of 2009 relating to Parallel Operation Charges(Grid Support Charges ) in Cchathisgarh 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> |

**38. GRK Prasad, Executive Director, Nava Bharat Chambers, Raj Bhavan Road, Hyderabad - 082**

| S.No. | Summary of Objections / Suggestions  | Response of the Licensee  |
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| 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 find no fault</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;</p> |

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|   | <p><b>in the same. Thus, the order of the Commission concerning the Grid Support Charges has to be upheld...</b></p> <p><b>The Hon 'ble Supreme Court upheld the Order of APERC but the facts remains 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.</b></p> | <p><i>dt. 18.02.2012-Chhattisgarh State Power Distribution v/s. Godawari Power &amp;Ispat Ltd) and SERC orders.</i></p> <p><i>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.</i></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>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><b>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.</b></p>  | <p>No comments</p>  |
| 3 | <p><b>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 dated01.06.2008 and Order dated 31.12.2008, the excerpt of which is as follows:</b></p>   |   |





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|   | <p>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 | <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><b>HISTORY OF GRID SUPPORT CHARGES (GSC):</b></p> <p><b>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.</b></p> <p><b>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.</b></p> <p><b>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.</b></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> |

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| 6 | <p><b>THE IMPACT OF THE ELECTRICITY ACT, 2003:</b></p> <p><b>1.</b>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><b>2.</b>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.</p> <p><b>3.</b>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.</p> <p><b>4.</b>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.</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 allcosts (Incl SLDC &amp; Transmission</p> |
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|   | <p><b>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.</b></p> <p><b>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 Act for the purpose of determination of CSS and any proposal of the DISCOMs to levy GSC is itself misconceived and patently without jurisdiction.</b></p> <p><b>Without Prejudice to above submissions of the very authority and iurisdiction to levy GSC. the following further submissions are made.</b></p> | <p>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 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>However, the full Bench of Tribunal in Appeal No. 120 of 2009 relating to Parallel Operation Charges(Grid Support Charges ) in Cchathigarh by Order dated 18.02.2011 stated that <i>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.</i> 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> |
| 7 | <p><b>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:"</b></p>  |  |

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|   | <p><b>"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.</b></p> <p><b>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.</b></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><b>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 time 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.</b></p>  | <p>TS Discoms wants to state that the UI charges are levied to the tune upto ~12% of the deviation charges in the case where a Generator or a Discoms deviates from their said drawal 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><b>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 CPP is much less than a consumer without CPP.</b></p> <ol style="list-style-type: none"> <li><b>1. CPPs absorb some amount of harmonics whereas a consumer without CPP inject full quantum of harmonics generated to the grid.</b></li> <li><b>2. The unbalanced voltage of the grid is a source of negative phase sequence current which is absorbed by the generators of CPP.</b></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> <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</li> </ul>   |

3. **Fault level depends upon the generation capacity connected to the grid. The parallel operation of CPPs with the grid is infact beneficial with some degree of voltage support that the CPPs extend to the Grid**
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.**
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.**
6. **Due to injection of power by CPPs the load on the transformers in the grid reduces resulting in less transformer loss."**
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.**
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 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.**
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**

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.

- **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.**
- **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.**
- **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.**
- **The grid provides stability to the plant to start heavy loads like HT motors.**
- **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.**

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.

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.

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:

**Para- 15 of Order:**

- 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”.

**Para-16 of Order:**

- i. "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

The full Bench of Tribunal in Appeal No. 120 of 2009 relating to Parallel Operation Charges(Grid Support Charges ) in Cchathisgarh 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.

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

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.

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.
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

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.

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

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  |
| J&K               | Rs.16/- per kVA per month on the installed capacity of the CPP |

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.**

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.



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| <b>Karnataka</b>   | <b>Nil</b> |
| <b>Kerala</b>      | <b>Nil</b> |
| <b>Odisha</b>      | <b>Nil</b> |
| <b>West Bengal</b> | <b>Nil</b> |

- i. **The above utilities have proposed these rates after third party analysis.**
- ii. **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.**

**1. 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.**

**1. We request the Hon'ble Commission to engage a similar independent**

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

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| <p>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>1. 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>1. 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>1. 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>1. Since it needs to import startup power during the occasions of blackout, the grid connection is required.</p> <p>1. The Grid connection is requited to import renewable energy .</p> | <p><i>Conference 2004</i> also supports Technically the application of Grid Support Charges on Captive Power Plants.</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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**39. Maha cements, 9th Floor, Block - 3, My Home Hub, Madhapur, Hyderabad - 500 081**

| <b>S.No.</b> | <b>Summary of Objections / Suggestions</b>   | <b>Response of the Licensee</b> |
|--------------|--|---------------------------------|
| 1            | <p>1. 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 VI-IT 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>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 the Judgement of Hon 'ble Supreme Court Order dated 29.11.2019, 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 11 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</p> |                                 |

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|   | <p><b>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... "</b></p> <p><b>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 Electricity Act, 2003 for determination of Grid Support Charges.</b></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><b>We, My Home Industries Private Limited, own and operate Captive Power Plant(s) comprising coal based 60 MW and 15 MW Plants and also WHRS based 12.5 MW Plant in our cement manufacturing unit at Mellacheruvu (V&amp;M), Suryapet District, Telangana, and wish to submit our objections and concerns on the proposed levy of Grid Support Charges by TS DISCOMS as under:</b></p>   | <p>No comments</p>  |
| 3 | <p><b>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:</b></p> <p><b>"10.1 Advantages to CPPs:</b></p> <p><b>(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 of his load cycle.</b></p> <p><b>(2) Fluctuating loads of the industries connected in parallel with the grid</b></p> | <p>No comments</p>  |

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 equipments 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 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

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|   | grid, it absorbs the transient load. Hence, grid enhances the life of CPP equipment.   |  |
| 4 | In the above matter, the Distribution Licensees in Telangana and this Hon'ble Commission have invited the stakeholders to file their comments/suggestions/objections, if any, on or before 5.00 pm by 28.01.2022.  | No comments  |
| 5 | 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 taints all industries with CPPs even when no such instantaneous or intermittent loads or injection of harmonics are involved.   | 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. TS Discoms shall abide by the order of TSERC. |
| 6 | <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 AP Transco (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 at present are totally</p> |  |

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|   | <p>different. At that time, 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 in handling their affairs. States were exceeding the drawal limits as there was no stringent enforcement mechanism. As a result of which we have witnessed failure of Northern grid on 2nd January, 2001 and 230 million people were affected.</p> <p>4. There was no concept of Open Access, as such Transmission and Wheeling charges were allowed only by means of mutual 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 mention here 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 (<i>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</i>) 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><b>THE IMPACT OF THE ELECTRICITY ACT, 2003:</b></p> <p>I . 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>2. Open Access was introduced under Section 42 of the Act, in pursuance</p>  |   |

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 4d1 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 and Open Access (OA) Regulations, due to which 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

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



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|   | <p>Wheeling business and can levy those charges only, but 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 filed under S.62 of the Electricity Act, 2003, read with Regulations 2(n), 3.4, 6.4(a), 7.2(b), 7.4 and 12.1 of APERC Regulation No.4 of 2005 read with TSERC Regulation No.1 of 2014, the DISCOM has no role in proposing any GSC.</p> <p>8. It is also pertinent to note that this Hon'ble Commission is constituted under the Electricity Act, 2003 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.</p> <p>9. It is further submitted that the cost of the retail business of the Distribution Licensee is being covered by the proposed tariffs. Without specifying as to why the GSC is required and how much the same would cost the Licensee, there is no scope for levying such unspecified charges.</p> <p>10. 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</p> <p>APERC 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.</p> | <p>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 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> |
| 8 | <p>Captive Power Generation is delicensed under the Electricity Act, 2003 so as to lessen the burden on the Grid in meeting the distributed loads. The provision in</p>   |  |

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|    | <p><b>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:</b></p> <p><b>"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 a.ipet• Section 30 ofthe Act. Thi'</b></p> <p><b>should be done on priority basis to enable captive generation to become available as distributed generation along with the grid. "</b></p> <p><b>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.</b></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>   |
| 9  | <p><b>In the case of CPPs availing Open Access for transmission and wheeling ofpower 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.</b></p>  | <p>TS Discoms wants to state that the UI charges are levied to the tune upto ~12% of the deviation charges in the case where a Generator or a Discoms deviates from their said drawal 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> |
| 10 | <p><b>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 the Electricity Act, 2003.</b></p>  |   |

Moreover, variation of load of a consumer having CGP is much less than a consumer without CGP.

1. CGPs absorb some amount of harmonics whereas a consumer without CGP inject full quantum of harmonics generated to the grid.

2. The unbalanced voltage of the grid is a source of negative phase sequence current which is absorbed by the generators of CGP.

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

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.

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.

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

7. The CGPs are acting as distributed generators at the load center for which the transmission and distribution loss has been reduced to great extent. In fact, the CGPs connected to the grid are facing issues due to the irregularities in grid operation by TSTRANSCO.

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. Section 2(32) of the Electricity

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.**

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

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 intergrade 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. 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.

9. The transmission licensee and the SLDC are responsible for maintaining the network and the Grid. Moreover, the provisions of the Electricity Act do not differentiate between an IPP and a CGP in so far as Grid connectivity is concerned and hence both should be treated equitably from the viewpoint Grid support and connectivity. Moreover, industries with arc furnaces and rolling mills without CGP create larger disturbances in the grid as compared to those with a CGP. CGPs provide advantages to the Grid such as providing VAR support and fault MVA support.

10. There is no provision in the statute empowering 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

11. It is relevant to mention here the observations 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

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.

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."

12. 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.
13. The proposed levy of 50% of the Demand Charges of Rs. 475 per KVA per month, proposed by TSDISCOMS has no basis and is grossly excessive and arbitrary.
14. 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.
15. Further, the original proposal when GSC was proposed by APERC during the year 1999 and 2002, the Electricity Act 2003 was not in force. The Act is in 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 should be treated equitably from the viewpoint of grid connectivity and support.
16. The proposed arbitrary levy of GSC aims to stifle the consuming industries, which in turn erodes the viability of the principal industry to a point that it may perforce cease operations.
17. 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.
18. 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.
19. 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 frequent 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 regular basis. Aggregate capacity of the CPPs now is relatively marginal

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.

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|    | <p>compared to the Grid Size and no real forbearance could be possible warranting such huge and arbitrary levy.</p> <p>20. Grid Support Charges cannot 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>21. 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, in addition to 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> |  |
| 11 | <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 apart from loss of revenue to the exchequer.</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>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>  |
| 12 | <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 at 50% of demand charges and why not 2% or 5% is not specified. If the proposed GSC is considered, a captive power generating plant having installed capacity of 100 MW, is forced to pay GSC Rs.2.97 Crores per month and Rs.35.63 Crores per annum, which will inevitably result in the closure of the industry in Telangana.</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>Further, Research paper on "<i>Grid Support charges on Captive power plant</i>", by K. Balaraman, Ananthapadmanabha, R. Nagraja, K. Parthasarthy; presented at IIT Madras – National Power System Conference 2004 also supports Technically the application of Grid</p> |
| 13 | <p>Most of the CPPs installed capacities are much higher when compared to their captive load. When the 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>   |  |

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|  |   | 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><b>PRAYER</b></p> <p><b>That, in view of the above, we pray that the Hon'ble Commission may be graciously pleased to-</b></p> <p><b>a) reject the proposal of the levy of Grid Support Charges; and</b></p> <p><b>b) consider our foregoing objections, and grant us a personal hearing and grant leave to adduce further evidential data in our support at the time of hearing either by our representative or legal counsel.</b></p> | No comments   |



**40. Ashu Guptha, Clean max Head Regulatory and Government Relations, M.No.9644400066, Clean max, enviro energy solutions Pvt ltd, 4th Floor, the international, 16th Maharshi karve Road, New marine lines Cross Road No.1 churchi gate, Mumbai -400020**

| S.No. | Summary of Objections / Suggestions   | Response of the Licensee  |
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| 1     | <p>In the matter of parallel operation charges, in the draft ARR the state utilities have taken reliance on the ‘Honorable CSERC Discussion paper on PoC determination dt.01.06.2008’. It is pertinent to mention here that: the same was proposed to be determined and applied on CPPs based on firm power sources like coal, gas, biomass, bagasse etc. and not on infirm power sources like wind and solar.</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>Here the consumer was though connected to the utilities grid but has neither availed any contract demand nor was in the ambit of regime of contract demand charges from the utility and the load was catered by the CPP. Further any surplus power was exported and billed to the state utility and in case of any startup / ramp-up power required by the CPP or power required by the consumers load during the shutdown or breakdown of the CPP was drawn from the utility paying temporary charges of power.</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.<br/>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>In case, even if the consumer takes the contract demand from utility, it was either minimal or to the tune of difference between his total load / Contract Demand requirement and the Capacity of the CPP.</p>   | <p>No comments</p>  |
| 4     | <p>Whereas in the case of Renewable Energy Generating Station from Solar and Wind the client in always under the ambit of the Contract Demand regime to the tune of its connected load duly paying the contract demand charges and the load. This Contract Demand availed from the utility is equal or more than the total connected load / demand of the consumer. It is never the case when the consumer has the option / liberty to reduce its Contract Demand below its</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>   |

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|   | connected load to the tune of the CPP from such renewable energy source of wind and solar.   |  |
| 5 | Thus, the consumer cannot draw power over and above the contract demand maintained from the utility at any given point of time and in the event the contract demand exceeds for a moment above the availed contract extra fixed and temporary charges are applicable as per the provisions of the regulations.   |  |
| 6 | In the event of Captive Rooftop Solar PV Power Plant in the premises of the consumer the capacity of the solar power plant is governed by the capacity restriction as provided by the regulations which is upto a maximum of 80% of the contract demand availed from utility by the consumer.  | <b>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.</b>  |
| 7 | <p>Thus, in the case of renewable energy if we go by the formula proposed in the petition which states that:</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>Suppose:</p> <p>1.(A) Total capacity of CPP from solar resource is 800 KVA.</p> <p>2.(B) The total load / Contracted maximum demand of the consumer is 1000 KVA.</p> <p>3.Further the solar / wind does not give FIRM power.</p> <p>Then as per the formula the Charges will be</p> <p>{(A) – (B)} x demand Charges x 50% which will go in negative.</p> | <p><b>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.</b></p> |

Thus, as per our understanding the proposed grid support charges for CPPs in parallel operations from renewable energy sources from Solar / Wind cannot be applied.

It is also pertinent to mention that the Renewable Energy Generating plants installed in the state were installed as per the terms and conditions and charges as applicable at that particular point of time and any new charges to be imposed on these older installation will be violation of the law. It's an established principle of retrospective application of law the honourable APEX Court of India going against the retrospectivity also says that: The broad general principle is that a "vested right cannot be taken away by a retrospective law".

The SC has stressed on doctrine of fairness and how it would be unfair to fasten an obligation based on an amendment in law in the future. It unequivocally also provides that a legislation which impose new obligations should be treated as prospective, but the same which confers a benefit, could be construed as retrospective considering the intent of the lawmakers.

Any retrospective introduction of the superseding / amendment of the regulations thus will contradict the Doctrine of Legitimate Expectations, Principles of Promissory Estoppel in the present case.

These charges if imposed on the renewable energy generating plants from solar and wind will deter the development and growth of renewable energy in the state and will be violation of the Objectives behind the enactment of The Electricity Act, 2003.

Further imposition of such arbitrary charges on the rooftop solar (renewable energy generation) will create hurdle in the achievement of the sustainability goals of the consumers in the state which are committed to contribute towards the fight for the global warming. Further imposition of such regulatory charges to discourage consumption of renewable energy from own resources and forcing them to buy RE from the state utilities shall be avoided.

The apex court in their landmark judgement stated that: If de-licensing of the

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 and reliable power.

TS Discoms understands the environmental benefits of promoting the RE and have always actively participated in promoting green energy.

**However, 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.**

generation is the prime object of the Act, the courts while interpreting the provisions of the statute must guard itself from doing so in such a manner which would defeat the purpose thereof. It must bear in mind that licensing provisions are not brought back through the side door of Regulations.

Further it is submitted that:

1.Honorable Rajasthan DISCOMS in their petition to the honorable State commission has categorically stated that the said charges shall not be applicable on renewable energy sources. Some other states like Maharashtra has also not imposed the same on RE.

2.Almost all of the states in the country have not imposed any such charge on the RE generation and consumption.

**Solar Rooftop Target Vs. Achievement:**

It is important to refer the following data on the total achievement versus the target of rooftop in the state of Telangana (as per the records from MNRE).

|   |        |    |
|---|--------|----|
| Target of Rooftop Solar till 2021-22            | 2000   | MW |
| Achievement of Rooftop Solar till 31st Dec 2021 | 205.69 | MW |
| Percentage Achievement                          | 10.28% |    |

**Benefits derived by the DISCOMs from the Rooftop Solar PV Power Projects: Solar Renewable Power Purchase Obligation (SRPPO) and CDM Benefits –** The regulations of the honorable commissions allows the state utilities to account the generation from these rooftop solar PV Power plant installed in the state of Telangana for their complimentary Solar RPO for which other wise the state utilities would have to incur financial burden. In the similar manner the regulations also permit the sharing of the complimentary CDM benefits for the solar power generated from such plants in the state of Telangana thus providing direct financial saving to the state utilities from such

**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.**

**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.**

renewable energy generating plants in the premises of the consumer.

**SUBMISSION**

**1.Thus, to remove ambiguity and any future difficulty being faced by the consumer / CPP from renewable energy sources from infirm power sources of solar and wind the honorable commission is requested to clarify and confirm that no such parallel operation charges / grid Support charges will be applicable from power consumed from infirm Renewable Energy Sources from Wind and Solar.**

**2.In case the honorable commission so decides to impose such charges on the CPPs from infirm renewable energy sources of solar / wind / hybrid the projects and generation from the plants installed on or before the date of notification / imposition of these charges shall be exempted from these charges for the life of these projects.**

**41. Shriprakash Rai, AMP Energy India Pvt Ltd, 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><b>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.</b></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, 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</p>   | <p>TS Discoms want to state that they have never intended to</p>   |

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|   | <p>most cases.</p> <p><b>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.</b></p>  | <p>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 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><b>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.</b></p> <p><b>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.</b></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>  |  |

**42. V.Manikanth, Penna Cements Industries Limited,Lakshmi Nivas,705,Road No.3 Banjara Hills,Hyderabad - 500034**

| <b>S.No.</b> | <b>Summary of Objections / Suggestions</b>  | <b>Response of the Licensee</b>   |
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| 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 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, Rajashtan, 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 -</p> <ul style="list-style-type: none"> <li>• Meter reading were suspended with enforcement of national level lockdown in</li> </ul> |



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|   |   | <p>March 2020. Meter readings remained suspended till May and normal meter reading commenced from June 2020</p> <ul style="list-style-type: none"> <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> |
| 2 | <p><b>Computation of depreciation in accordance with CERC (Terms and Conditions of Tariff) Regulations, 2019.</b></p> <p><b>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.</b></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><b>New Time of Day (ToD) Tariff</b></p> <p><b>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’</b></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>  |

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| <p>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><b>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.</b></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 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> |
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| 4 | <p><b>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.</b></p> <p><b>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.</b></p> <p><b>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.</b></p> <p><b>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.</b></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</p> <p><i>“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.”</i></p> <p>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> |
| 1 | <p><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:”</b></p> <p><b>“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</b></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-</p>  |

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|   | 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.”  | <i>Chhattisgarh State Power Distribution v/s. Godawari Power &amp;Ispat Ltd)</i> and SERC orders.  |
| 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. | <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> |
| 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. Moreover variation of load of a consumer having CPP is much less than a   | As per the proposed grid charges conditions, the grid support charges will not be levied on  |

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|   | consumer without CPP.  |  |
| 4 | The unbalanced voltage of the grid is a source of negative phase sequence current which is absorbed by the generators of CPP.  | the entire capacity of CPP and it will be levied only on differential capacity between CPP capacity and CMD with Distribution Licensee.  |
| 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.  | <b>Grid Support charges computation example:</b><br>Captive Capacity = 100 MVA = 100,000 kVA<br>.....[a]<br>CMD with Distribution licensee = 90 MVA = 90,000 kVA.....[b]   |
| 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."  | Differential capacity = [a-b] = 10 MVA = 10,000 kVA ...[c]<br>GSC (Rs. Cr.) = c * 50% of Demand charges<br>= 10000 * (50% of say Rs. 475) / 10 <sup>7</sup><br><b>= Rs. 0.2375 Cr./ month</b>  |
| 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.   | <b>Comparison of GSC with other states like Madhya Pradesh, Gujarat, Tamil Nadu Chattisgarh</b><br><br>Consider GSC @ Rs. 25 / kVA / month<br>Captive Capacity = 100 MVA = 100,000 kVA<br>GSC (Rs. Cr.) = 25 * 100000 / 10 <sup>7</sup><br><b>= Rs. 0.25 Cr. / month</b> |
| 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 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. | <b>Thus GSC determined by TS Discoms is very much justifiable.</b><br><br>The grid support charges are not for drawl of power from the Distribution Licensee, but for utilization of parallel operation benefits by captive generators.                                  |

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|   |   | <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> <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. 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> |
| 9 | <p><b>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.</b></p> | <p>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 &amp; Tariff proposal of the licensee is also same as approved in erstwhile APERC orders i.e., 50% of</p>  |

|                   |   | the prevailing demand charge for HT Consumers.   |                                   |                |                 |      |                 |         |                 |           |                 |     |  |        |     |             |     |        |     |  |
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| 10                | <b>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.</b>   | 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                | <b>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.</b>   |  |                                   |                |                 |      |                 |         |                 |           |                 |     |  |        |     |             |     |        |     |  |
| 12                | <b>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.</b>  |  |                                   |                |                 |      |                 |         |                 |           |                 |     |  |        |     |             |     |        |     |  |
| 13                | <b>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.</b>   | No comments  |                                   |                |                 |      |                 |         |                 |           |                 |     |  |        |     |             |     |        |     |  |
| 14                | <p><b>The prevailing parallel operation charge which is equivalent to the proposed GSC in other States is as follows:</b></p> <table border="1" data-bbox="473 906 1534 1422"> <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> <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>J&amp;K</td> <td>Rs.16/- per kVA per month on the installed capacity of the CPP</td> </tr> <tr> <td>Odisha</td> <td>Nil</td> </tr> <tr> <td>West Bengal</td> <td>Nil</td> </tr> <tr> <td>Kerala</td> <td>Nil</td> </tr> </tbody> </table> | Name of the State  | Grid Support Charges Rs/KVA/Month | Madhya Pradesh | Rs.20/KVA/Month | 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 | <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><b>Grid Support charges computation example:</b><br/> Captive Capacity = 100 MVA = 100,000 kVA .....[a]<br/> CMD with Distribution licensee = 90 MVA = 90,000 kVA.....[b]</p> <p>Differential capacity = [a-b] = 10 MVA = 10,000 kVA ...[c]<br/> GSC (Rs. Cr.) = c * 50% of Demand charges</p> |
| Name of the State | Grid Support Charges Rs/KVA/Month   |  |                                   |                |                 |      |                 |         |                 |           |                 |     |  |        |     |             |     |        |     |  |
| Madhya Pradesh    | Rs.20/KVA/Month   |  |                                   |                |                 |      |                 |         |                 |           |                 |     |  |        |     |             |     |        |     |  |
| 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   |  |                                   |                |                 |      |                 |         |                 |           |                 |     |  |        |     |             |     |        |     |  |

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|    | Karnataka   | Nil | <p>The above utilities have proposed these rates after third party analysis.<br/> 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> | <p style="text-align: right;">= 10000 * (50% of say Rs. 475) /<br/> 10<sup>7</sup><br/> = <b>Rs. 0.2375 Cr./ month</b></p> <p><b>Comparison of GSC with other states like Madhya Pradesh, Gujarat, Tamil Nadu Chattisgarh</b></p> <p>Consider GSC @ Rs. 25 / kVA / month<br/> Captive Capacity = 100 MVA = 100,000 kVA<br/> GSC (Rs. Cr.) = 25 * 100000 / 10<sup>7</sup><br/> = <b>Rs. 0.25 Cr. / month</b></p> <p><b>Thus GSC determined by TS Discoms is very much justifiable.</b></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> |
| 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</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,</p>   |  |



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|    | <p><b>TSTRANSCO, the capacity, which is dedicated to such export, will also be additionally subtracted from the CPP capacity”.</b></p> <p><b>We request to Hon’ble commission to consider the Captive Demand instead of difference between installed capacity of CPP and CMD of CPP.</b></p>  | <p>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>                            |
| 16 | <p><b>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.</b></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> |
| 17 | <p><b>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.</b></p> |   |

**43. Birla Shakthi Cements, B.Shasheen Rao, keshoram cementspeddapalli Dist**

| <b>S.No.</b> | <b>Summary of Objections / Suggestions</b>  | <b>Response of the Licensee</b>  |
|--------------|---|--|
| 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 benefited 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><li>• The variation in the voltage and frequency at the time of starting large motors and heavy loads, is minimized in the</li></ul> |

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|   |   | <p>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.</p> <ul style="list-style-type: none"> <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><b>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.</b></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><b>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.</b></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. 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:<br/> Captive Capacity = 100 MVA = 100,000 kKVA .....[a]<br/> CMD with Distribution licensee = 90 MVA = 90,000 KVA.....[b]</p> |

|                   |   | Differential capacity = [a-b] = 10 MVA = 10,000 kVA ....[c]<br>GSC (Rs. Cr.) = c * 50% of Demand charges<br>= 10000 * (50% of say Rs. 475) / 10 <sup>7</sup><br>= Rs. 0.2375 Cr./ month  |                                      |                |                 |             |                 |  |
|-------------------|---|--|--------------------------------------|----------------|-----------------|-------------|-----------------|--|
| 4                 | <b>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.</b>  | The industries benefited from the aforesaid advantages of parallel operation with the grid.  |                                      |                |                 |             |                 |  |
| 5                 | <b>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.</b>   | 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                 | <b>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.</b> | 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.<br>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.<br>Grid Support charges computation example: |                                      |                |                 |             |                 |  |
| 7                 | <b>The prevailing parallel operation charge which is equivalent to the proposed GSC in other States is as follows:</b><br><table border="1" data-bbox="317 1161 1376 1380"> <thead> <tr> <th>Name of the State</th> <th>Grid Support Charges<br/>Rs/KVA/Month</th> </tr> </thead> <tbody> <tr> <td>Madhya Pradesh</td> <td>Rs.20/KVA/Month</td> </tr> <tr> <td>Chattisgarh</td> <td>Rs.21/KVA/Month</td> </tr> </tbody> </table>                                | Name of the State  | Grid Support Charges<br>Rs/KVA/Month | Madhya Pradesh | Rs.20/KVA/Month | Chattisgarh | Rs.21/KVA/Month |  |
| Name of the State | Grid Support Charges<br>Rs/KVA/Month  |  |                                      |                |                 |             |                 |  |
| Madhya Pradesh    | Rs.20/KVA/Month   |  |                                      |                |                 |             |                 |  |
| Chattisgarh       | Rs.21/KVA/Month   |  |                                      |                |                 |             |                 |  |

|             |   |  |                 |           |                 |       |  |        |     |             |     |        |     |           |     |   |
|-------------|---|--|-----------------|-----------|-----------------|-------|--|--------|-----|-------------|-----|--------|-----|-----------|-----|---|
|             | <table border="1"> <tr> <td>Gujarat</td> <td>Rs.26/KVA/Month</td> </tr> <tr> <td>Tamilnadu</td> <td>Rs.30/KVA/Month</td> </tr> <tr> <td>J &amp; K</td> <td>Rs.16/KVA/Month on the installed capacity of the CPP</td> </tr> <tr> <td>Odisha</td> <td>Nil</td> </tr> <tr> <td>West 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. 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> | 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>Captive Capacity = 100 MVA = 100,000 kVA .....[a]<br/> CMD with Distribution licensee = 90 MVA = 90,000 kVA.....[b]</p> <p>Differential capacity = [a-b] = 10 MVA = 10,000 kVA ....[c]<br/> GSC (Rs. Cr.) = c * 50% of Demand charges<br/> = 10000 * (50% of say Rs. 475) / 10<sup>7</sup><br/> = 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<br/> Captive Capacity = 100 MVA = 100,000 KVA<br/> GSC (Rs. Cr.) = 25 * 100000 / 10<sup>7</sup><br/> = Rs. 0.25 Cr. / month</p> <p>Thus GSC determined by TS Discoms is very much justifiable. A 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> |
| 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   |  |                 |           |                 |       |  |        |     |             |     |        |     |           |     |   |
| 8           | 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.  |  |                 |           |                 |       |  |        |     |             |     |        |     |           |     |   |
| 9           | The effect of the grid support is different to in different classes of consumers like industries with continuous parallel operation and standby permission. Whether uniform grid support charges are to be levied on all consumers is a point for discussion.   | 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 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   | 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   |                 |           |                 |       |  |        |     |             |     |        |     |           |     |   |

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|    | <b>in closure of operations and in loss of direct and indirect employment aside from loss of revenue to the exchequer.</b>   | with licensee, such captive power plant capacity will not attract grid support charges.   |
| 11 | <b>For the reasons stated herein-above, may be pleased to reject the levy of grid support charges for parallel operation during CPP startup &amp; Stop Conditions.</b> | 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. |

**44. Sri Luxmi Tulasi Agro Paper (P) Ltd, Aswaraopeta,507301,Kothagudem Dist,Telangana**

| 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 (<i>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</i>) 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 per mitted 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 Electricity Act, 2003. Moreover variation of load of a consumer having CGP is much less than a consumer without CGP.</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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| 4 | <b>CGPs absorb some amount of harmonics whereas a consumer without CGP inject full quantum of harmonics generated to the grid.</b>  | 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 | <b>The unbalanced voltage of the grid is a source of negative phase sequence current which is absorbed by the generators of CGP.</b>  | The voltage of the grid is never unbalanced and is maintained balanced as per IEEC standards   |
| 6 | <b>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 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.</b>   | 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.<br><br>Such fault isolation techniques adopted by Grid are not dependent on the parallel operation with CGP  |
| 7 | <b>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. 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</b> | The grid support charges are not for drawl of power from the Distribution Licensee and for utilization of parallel operation benefits by captive generators.   |
| 8 | <b>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 also applicable for CPPs which does not result in any undue advantage.</b>  | 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.<br>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. |
| 9 | <b>Due to injection of power by CGPs the load on the transformers in the grid</b>   | An in-house CGP producing power will be drawn by the loads   |



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|    | reduces resulting in less transformer loss."  | <p>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.</p> <p>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.</p>  |
| 10 | <b>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.</b>   | <p>TS Discoms wants to state that the UI charges are levied to the tune upto ~12% of the deviation charges in the case where a Generator or a Discoms deviates from their said drawal 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> |
| 11 | <b>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 issueswhish are common for</b> | <p>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</p>  |

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|    | <b>industries with CPPs and without CPPs.</b>   |  |
| 12 | <p><b>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.</b></p> <p><b>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.</b></p> | <p>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.</p> <p>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 Distribution Licensee and for utilization of parallel operation benefits by captive generators.</p>   |
| 13 | <p><b>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.</b></p>  | <p>TS Discoms wants to state that the UI charges are levied to the tune upto ~12% of the deviation charges in the case where a Generator or a Discoms deviates from their said drawal 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>The surplus of CPP would be based on mutual agreement. There has never been a power deficit situation in the system as power utilities have had sufficient power purchase agreements from the</p> |

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|    |  | <p>past 7 years.</p> <p>Further the faults in the system are very minimal and being isolated as per the standards and contribution for feeding faults MVA of CPPs is <b>not upto considerable level.</b></p>   |
| 14 | <p><b>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.'</b></p>   | <p>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</p> <p>TS Discoms have installed suitable meters (ABT meters) at the consumer end to measure the harmonics. If any consumer is going over and above the threshold value, TSDiscoms are instructed to mitigate the harmonics to the consumer. If not, the supply is being disconnected.</p>  |
| 15 | <p><b>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:</b></p> <p><b>i) Para- 15 of Order:</b></p> <p><b>"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</b></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><br/> Captive Capacity = 100 MVA = 100,000 kVA .....[a]<br/> CMD with Distribution licensee = 90 MVA = 90,000 kVA.....[b]</p> <p>Differential capacity = [a-b] = 10 MVA = 10,000 kVA ....[c]<br/> GSC (Rs. Cr.) = c * 50% of Demand charges<br/> = 10000 * (50% of say Rs. 475) / 10<sup>7</sup><br/> = <b>Rs. 0.2375 Cr./ month</b></p> |

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 al/ 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 al/ 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."

**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.) =  $25 * 100000 / 10^7$   
**= Rs. 0.25 Cr. / month**

**Thus GSC determined by TS Discoms is very 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.

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

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|    |  | proposal of Grid Support charges for FY 2022-23 are well within the provisions of Act   |
| 16 | <b>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.</b> | 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. |
| 17 | <b>Further, the Original proposal when GSC was propqsee by. APERC during the Y 1999/2002/ the Electricity Act is Actis in force from 2003 and Section 9 of Electricity Act does not difference 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.</b>        | 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.   |
| 18 | <b>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 everincreasing grid tariff.</b>  | 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.  |
| 19 | <b>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.</b>  |   |
| 20 | <b>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.</b>   |   |
| 21 | <b>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.</b>  | 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.   |                                   |                |                 |      |                 |         |                 |           |                 |  |   |  |
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| 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.  | 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. |                                   |                |                 |      |                 |         |                 |           |                 |  |   |  |
| 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"> <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> <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 capacity of the CPP</td> </tr> </tbody> </table> | Name of the State  | Grid Support Charges Rs/KVA/Month | Madhya Pradesh | Rs.20/KVA/Month | RERC | Rs.20/KvA/Month | Gujarat | Rs.26/KVA/Month | Tamilnadu | Rs.30/KVA/Month |  | Rs. 16/- per kVA per month on the installed capacity of the CPP | <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><b>Grid Support charges computation example:</b><br/> Captive Capacity = 100 MVA = 100,000 kVA .....[a]<br/> CMD with Distribution licensee = 90 MVA = 90,000 kVA.....[b]</p> <p>Differential capacity = [a-b] = 10 MVA = 10,000 kVA ....[c]<br/> GSC (Rs. Cr.) = c * 50% of Demand charges<br/> = 10000 * (50% of say Rs. 475) / 10<sup>7</sup><br/> = <b>Rs. 0.2375 Cr./ month</b></p> |
| Name of the State | Grid Support Charges Rs/KVA/Month   |  |                                   |                |                 |      |                 |         |                 |           |                 |  |   |  |
| Madhya Pradesh    | Rs.20/KVA/Month   |  |                                   |                |                 |      |                 |         |                 |           |                 |  |   |  |
| RERC              | Rs.20/KvA/Month   |  |                                   |                |                 |      |                 |         |                 |           |                 |  |   |  |
| Gujarat           | Rs.26/KVA/Month   |  |                                   |                |                 |      |                 |         |                 |           |                 |  |   |  |
| Tamilnadu         | Rs.30/KVA/Month   |  |                                   |                |                 |      |                 |         |                 |           |                 |  |   |  |
|                   | Rs. 16/- per kVA per month on the installed capacity of the CPP   |  |                                   |                |                 |      |                 |         |                 |           |                 |  |   |  |

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|---------------|---|---|-----|---------------|-----|--------|-----|-----------|-----|---|
|               | <table border="1"> <tr> <td data-bbox="317 191 580 245">Odisha</td> <td data-bbox="580 191 1381 245">Nil</td> </tr> <tr> <td data-bbox="317 245 580 298">Vilest Bengal</td> <td data-bbox="580 245 1381 298">Nil</td> </tr> <tr> <td data-bbox="317 298 580 352">Kerala</td> <td data-bbox="580 298 1381 352">Nil</td> </tr> <tr> <td data-bbox="317 352 580 412">Karnataka</td> <td data-bbox="580 352 1381 412">Nil</td> </tr> </table>   | Odisha  | Nil | Vilest Bengal | Nil | Kerala | Nil | Karnataka | Nil | <p><b>Comparison of GSC with other states like Madhya Pradesh, Gujarat, Tamil Nadu, Chhattisgarh</b></p> <p>Consider GSC @ Rs. 25 / kVA / month<br/> Captive Capacity = 100 MVA = 100,000 kVA<br/> GSC (Rs. Cr.) = 25 * 100000 / 10<sup>7</sup><br/> = <b>Rs. 0.25 Cr. / month</b></p> <p><b>Thus GSC determined by TS Discoms is very justifiable.</b></p> |
| 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 Rs 35.63 Crores per annum, results closure of Industries in Telangana.</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>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</p> |     |               |     |        |     |           |     |   |
| 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>  |   |     |               |     |        |     |           |     |   |

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|    |   | 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.  |
| 27 | <b>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.</b>  | 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.           |
| 28 | <b>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.</b> | The proposed Grid Support charges is also one of the tariff 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. |



**45. P.Battacharya, Distributed Solar Power Association,A-57,DDA Sheds , Okhla Industrial,Phase II,New Delhi -110020**

| S.No. | Summary of Objections / Suggestions  | Response of the Licensee  |
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| 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 (APERC) 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</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</p>  |

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|   | <p>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>operation need to compensate through Grid Support charges</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>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 proposed grid support charges are 50% of prevailing demand charges for HT consumers on the differential capacity.</p> <p><b>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. 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.</b></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> |

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| 4 | <p><b>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:-</b></p> <p><b>“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”</b></p> <p><b>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.</b></p> <p><b>In view of the aforesaid submission, we humbly request the Hon’ble Commission to consider the following:</b></p> <p><b>a) Reject the imposition of Grid Support Charges to consumers operating Captive Power Plants from renewable sources.</b></p> <p><b>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 licensee in fixing up cross subsidy surcharge without any under recovery.”</b></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.</p> <p>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.</p> <p>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.</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</li> </ul> |
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|  |  | <p>meters in a phased manner.</p> <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 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 accordingly request the Hon'ble Commission to approve the same after due regulatory proceedings.</p> |
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**46. Indian Energy Exchange, Plot No.C-001/A/19th Floor,Max Towers,16B Noida,Gautam Buddha Nagar,U.P.201301**

| S.No.                    | Summary of Objections / Suggestions   | Response of the Licensee            |   |                                  |                               |                                  |             |                                  |         |      |      |       |      |         |      |      |        |      |         |      |      |   |                          |   |                                     |                            |             |                               |                      |             |                                  |        |      |      |     |      |      |      |      |      |
|--------------------------|---|-------------------------------------|---|----------------------------------|-------------------------------|----------------------------------|-------------|----------------------------------|---------|------|------|-------|------|---------|------|------|--------|------|---------|------|------|---|--------------------------|---|-------------------------------------|----------------------------|-------------|-------------------------------|----------------------|-------------|----------------------------------|--------|------|------|-----|------|------|------|------|------|
| 1                        | <p><b>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><b>Table: 1- Comparison of ABR and Energy Sales</b></p> <table border="1" data-bbox="432 820 1524 1248"> <thead> <tr> <th>HT-I Industrial Category</th> <th>ABR proposed in the Petition (Rs./unit)</th> <th>Revenue (Rs. Cr) [a]</th> <th>Sales (MUs) [b]</th> <th>Computed ABR (Rs./unit) [a/b*10]</th> </tr> </thead> <tbody> <tr> <td>11 KV</td> <td>9.54</td> <td>4207.27</td> <td>4409</td> <td>9.54</td> </tr> <tr> <td>33 KV</td> <td>8.51</td> <td>4869.04</td> <td>5721</td> <td>8.51</td> </tr> <tr> <td>132 KV</td> <td>7.74</td> <td>2480.19</td> <td>3535</td> <td>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 | <p>TS Discoms have noted the point mentioned by the objector.</p> <p>TS Discoms want to state that the calculation for CSS for HT I Ind. 132 kV level made by TS Discoms are correct.</p> <p>HMWS category revenue and sales needs to be deducted from the HT Ind category before determining the CSS.</p> <p>TS Discoms have followed the same methodology for calculating ABR for HT I Ind. 132 kV level (HMWS Sales: 1143 MUs)</p> <p>However the same methodology is not followed for 11 kV and 33 kV as the HMWS sales for these categories are comparatively very less i.e 40 &amp; 53 MUs resp.</p> <p>The below table would clarify the doubts asked by Objector for calculating ABR for 132 kV level</p> <table border="1" data-bbox="1553 1079 2459 1318"> <thead> <tr> <th>HT-I Industrial Category</th> <th>ABR proposed in the Petition (Rs./unit)</th> <th>Revenue from HT-I Cat (Rs. Cr.) [a]</th> <th>HMWS Revenue (Rs. Cr.) [b]</th> <th>[c]=[a]-[b]</th> <th>Sales from HT-I Cat (MUs) [d]</th> <th>HMWS Sales (MUs) [e]</th> <th>[f]=[d]-[e]</th> <th>Computed ABR (Rs./unit) [c*10/f]</th> </tr> </thead> <tbody> <tr> <td>132 KV</td> <td>7.74</td> <td>2483</td> <td>631</td> <td>1852</td> <td>3535</td> <td>1143</td> <td>2392</td> <td>7.74</td> </tr> </tbody> </table> | HT-I Industrial Category | ABR proposed in the Petition (Rs./unit) | Revenue from HT-I Cat (Rs. Cr.) [a] | HMWS Revenue (Rs. Cr.) [b] | [c]=[a]-[b] | Sales from HT-I Cat (MUs) [d] | HMWS Sales (MUs) [e] | [f]=[d]-[e] | Computed ABR (Rs./unit) [c*10/f] | 132 KV | 7.74 | 2483 | 631 | 1852 | 3535 | 1143 | 2392 | 7.74 |
| 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 from HT-I Cat (Rs. Cr.) [a] | HMWS Revenue (Rs. Cr.) [b]              | [c]=[a]-[b]                      | Sales from HT-I Cat (MUs) [d] | HMWS Sales (MUs) [e]             | [f]=[d]-[e] | Computed ABR (Rs./unit) [c*10/f] |         |      |      |       |      |         |      |      |        |      |         |      |      |   |                          |   |                                     |                            |             |                               |                      |             |                                  |        |      |      |     |      |      |      |      |      |
| 132 KV                   | 7.74  | 2483                                | 631                                     | 1852                             | 3535                          | 1143                             | 2392        | 7.74                             |         |      |      |       |      |         |      |      |        |      |         |      |      |   |                          |   |                                     |                            |             |                               |                      |             |                                  |        |      |      |     |      |      |      |      |      |

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| 2 | <p><b>Computation of CSS</b></p> <p><b>B. Non-Consideration of Transmission Charges and Losses</b></p> <p>i. <b>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:</b></p> <p><i>“3 Cross Subsidy Surcharge Proposals</i><br/> <i>3.1 Legal and Policy position– Cross Subsidy Surcharge</i><br/> .....<br/> <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><u>a)</u> Per unit weighted average cost of power purchase including meeting the Renewable Purchase Obligation;</i></p> <p><i><u>b)</u> Transmission and distribution losses applicable to the relevant voltage level;</i></p> <p><i><u>c)</u> Transmission, distribution and wheeling charges up to the relevant voltage</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> |

level;

***d) Per unit cost of carrying regulatory assets, if applicable.  
Surcharge formula (as per NTP, 2016):***

***Where,***

***- is the surcharge***

***T - is the tariff payable by the relevant category of consumers including reflecting the Renewable Purchase Obligation;***

***C - is the per unit weighted average cost of power purchase of by the Licensee, including meeting the Renewable Purchase Obligation;***

***D - is the aggregate of transmission, distribution and wheeling charge applicable to the relevant voltage level;***

***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.***

....

***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.”***

***(Emphasis Added)***

- 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).**
- 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**

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|   | <b>National Tariff Policy, 2016.</b>  |  |
| 3 | <p><b>Short term procurement/sale through IEX A. Introduction of long duration contracts at the IEX</b></p> <p><b>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.</b></p> <p><b>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.</b></p> <p><b>As on date, the approval is pending before the Hon’ble CERC.</b></p> <p><b>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.</b></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> |
| 4 | <p><b>Renewable Energy from Power Exchange</b></p> <p><b>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.</b></p> <p><b>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.</b></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</p>  |



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|   | <p>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>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>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 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</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> |

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|  | <p><b>Distribution licensee and may not need to be supplemented with additional charges as claimed by the Petitioner.</b></p> <p><b>We accordingly request the claim to be rejected by the Hon'ble Commission.</b></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> |
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| <b>47. Mr. G. Sri Ram, Solar Motors, Sai Nagar, Nagole</b> |   |   |
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| <b>S.No.</b>   | <b>Summary of Objections / Suggestions</b>  | <b>Response of the Licensee</b>   |
| 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.</p> <p>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.</p> <p>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.</p> <p>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> |

**48. G R Karunakar, Plot 56, Laxmi Mega Township Ragannaguda Rangareddy District 501510**

| S.No. | Summary of Objections / Suggestions  | Response of the Licensee  |
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|       | <p>The Discoms are not charging either consumption charges, electric lines provision expenditure and not fixing any meter to measure the actual consumption at all agricultural consumption points. The information about the exact power consumption for agricultural use is not available. The tariff also subsidizes to various consumers like those involved in poultry, Pisciculture, salons, laundries, power looms, agro based activities, cottage industries etc. The subsidized power is supplied to metro rail and HMWSSB. As on February 2021, HMWSSB subsidy dues from the State Government were Rs.1850 crores by now it must have crossed about 2400 crores. Similarly the Mission Bhagirat which is supplying drinking water to rest of the state must be due to Discoms for a huge amount. The mission Bhagirat is taking loans to the tune of Rs 2500 crores to meet its expenditure on operations and maintenance of its network. The Discoms are unable to collect the arrears to the tune of about 300 crores pending for more than 6 months. NPDCL must also have such arrears which it is not collecting. Dues from Government buildings are also not being collected. The Discoms are not disconnecting them. The TSSPDCL has taken a decision to write-off the bad debts to the tune of about 200 crores. Similarly NPDCL might have bad debts again to a tune of Rs 200 Crores.</p> <p>Both the Discoms have projected their short fall of Rs. 22000 crores for 2 years of 2022 and 2023. The true up charges pertaining to 2019-20 and 2020-21 will be added to it. Since the last couple of years the State Government has not released the total subsidy amount. It is generally agreed that any tariff to different sections of consumers shall be - minus or plus 20% of ACS. If this is allowed by ERC, Discoms or generating stations or transmission companies need not look for the State Government subsidy to dole out. If not let the commission insist the State Government to pay in advance 100% subsidy amount as per section 65.</p> <p>The Discoms have not submitted both ARR and tariff proposals to TSERC for a couple</p> | <p>The consumption to agriculture is being estimated based on the ISI methodology that is been approved by the Hon'ble Commission and the same is being prudently checked by the Commission.</p> <p>Further, the subsidized tariff in respect of certain group/class of consumers like, Poultry, Pisciculture, Hair Cutting Saloons, Laundries, Power Looms, Metro Rail and HMWS&amp;SB is being extended as approved by the Hon'ble TSERC. However, in case of Poultry, Hair Cutting Saloons, Laundries and HT Spinning Mills, the subsidy/incentive is being extended on receipt of amounts from the Govt. of Telangana. The TSSPDCL has not taken any decision and written off any amount of C.C. charges so far except a provision was made as Bad and Doubtful debts in the Books of Accounts.</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> |

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| <p>of years since 2014. How did ERC allow the Discoms to continue collections on tariff approved some five years ago? The Discoms have also not collected from those subsidized consumers as per the approval five years ago. ERC has not taken any action.</p> <p>Suppose the State Government does not appoint the Chairman and members of the ERC, what difference does it make for Discoms or power sector to run the show as they have been doing for the last 5-6 years? Who dares to cancel the distribution license?</p> <p>I bring to the kind attention of the commission the present political environment of freebees promises. All unethical and corrupt election promises at the cost of public taxes will doom each and every Government Department and the Government will not be in a position to even help the most needy and helpless citizen. I request the commission to save the power sector companies and be a driving force for the country to become Atma Nirbhar Bharat</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> <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</p> |
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|  |  | <p>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><li>• Pending information from ICAD department on Lift Irrigation (LI) schemes.</li><li>• Pending finalisation of the annual accounts for the base year in the Board Meeting, whose values are considered for revisions in the cost estimates of ARR for Distribution Business.</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></ul> |
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|  |  | <ul style="list-style-type: none"><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 dismissed 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. Additionally, TS Discoms have also filed the APR for 2020-21 on 31 December 2021.</p> <p>TS Discoms are in the process of filing True up claim for Retail Supply Business for FY2018-19 to FY2021-22(prov.) before the Hon'ble Commission.</p> |
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49. [Gorrey Narasappa](#), Mobile 7569600400, H.NO. 1-12, Maddelbheed (Village), Damera Gidda (Mandal), Narayanpet District

|  | Summary of Objections / Suggestions  | Response of the Licensee   |
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|  | <p>తమారితో చేయు మనవి ఏమనగా నేను గొర్రె నర్సప్ప S / o తిమ్మప్ప గ్రామము మద్దెల బేదు మండలం దామర్ గిద్ద జిల్లా నారాయణపేట నా యొక్క ఎద్దు మృత వేసుకుంటూ గిరిమొళ్ళ రాములు S / o హన్మంతు వాళ్ళ పొలము దగ్గర ఉన్న ట్రాన్స్ పోరింగ్ దగ్గర పై తగిలి విద్యుత్ షాక్ కు ఎద్దు మరణించడం జరిగింది మరణించిన తేదీ 23/08/2020 నాడు చనిపోయిన ఇంత వరకు తక్షణసాయం అందలేదు రాలేదు నా యొక్క వ్యవసాయం ఎద్దు లేని కారణంగా కంటబడినది నా యొక్క ఆర్థిక వ్యవస్థ అంతంత మాత్రమే ఉంది కావున వెంటనే తక్షణ సాయం అందిస్తే మరల ఎద్దుని కొని నా యొక్క జీవన ఆధారం కొనసాగిస్తానని నా యొక్క ప్రార్థన</p> | <p>Rs.40000/- నష్టపరిహారం ఇవ్వడానికి LOC NO. 10018814, Dt:4.2.2022, పంపడము జరిగినది. వచ్చిన వెంటనే లబ్ధి దారునికి ఇవ్వడము జరుగును.</p> |



**50. Shashibhushan Kache, Shashibhushan Kache, Member, SAC, TSERC**

|         | Summary of Objections / Suggestions  | Response of the Licensee  |         |                              |  |  |  |          |  |         |  |         |         |         |         |         |     |     |    |   |         |     |     |    |   |         |     |     |    |   |         |    |     |    |   |
|---------|--|---|---------|------------------------------|--|--|--|----------|--|---------|--|---------|---------|---------|---------|---------|-----|-----|----|---|---------|-----|-----|----|---|---------|-----|-----|----|---|---------|----|-----|----|---|
|         | <p>1. బి పి యల్ కుటుంబాలకు పెడ్యూల్ కులాలు పెడ్యూల్ తెగలకు చెందిన వారికి 200 units వరకు ఉచిత విద్యుత్ అందించాలి. రాష్ట్ర ప్రభుత్వం సబ్సిడీల క్రింద చెల్లించాల్సిన మొత్తాని క్రమం తప్పకుండా ఆర్థిక సం. లో పే చెలించాలి</p> <p>2. విద్యుత్ప్రమాదాల నివారణకు పటిష్టమైన చర్యలు చేపట్టాలి రక్షణ వ్యవస్థను బలోపేతం చేసి ప్రమాదాలను నివారించాలి.</p> <p>చేతివృత్తుల వారు 250 units వరకు ఉచితంగా అందించాలి (క్షౌర్యశాలలు, ఇస్త్రీ షాపుల మాదిరిగా) గత మూడు సం. రాలుగా విద్యుత్ప్రమాదాల వివరాలు పంపిణీ సంస్థల వారీగా వ్యగలరు విద్యుత్ప్రమాదాల చెలింపు సామర్థ్యం యుండి దీర్ఘకాలికంగా పంపిణీ సంస్థలకు మొండి బకాయిల పనులు విషయమై పంపిణీ సంస్థలు తీసుకున్న చర్యలు నివేదిక.</p> | <p>ప్రభుత్వ ఆదేశాల మేరకు నెలకు 0-101 యూనిట్లు వినియోగించే SC/ST కుటుంబాలకు ఉచిత విద్యుత్ సరఫరా అందించబడుతోంది.</p> <p>ప్రమాదాల నివారణకై డిస్కామ్ వారు పటిష్టమైన చర్యలు తీసుకుంటున్నారు. గత మూడు సం. రాలుగా విద్యుత్ప్రమాదాల వివరాలు:</p> <table border="1" data-bbox="1553 706 2099 982"> <thead> <tr> <th rowspan="3">సం  రం</th> <th colspan="4">ప్రమాదం సంభవించిన వారి సంఖ్య</th> </tr> <tr> <th colspan="2">మరణించిన</th> <th colspan="2">గాయపడిన</th> </tr> <tr> <th>మనుషులు</th> <th>పశువులు</th> <th>మనుషులు</th> <th>పశువులు</th> </tr> </thead> <tbody> <tr> <td>2018-19</td> <td>294</td> <td>754</td> <td>21</td> <td>0</td> </tr> <tr> <td>2019-20</td> <td>258</td> <td>619</td> <td>34</td> <td>0</td> </tr> <tr> <td>2020-21</td> <td>238</td> <td>517</td> <td>53</td> <td>0</td> </tr> <tr> <td>2021-22</td> <td>76</td> <td>206</td> <td>21</td> <td>0</td> </tr> </tbody> </table> <p>ప్రస్తుతం చేతివృత్తుల వారికి డిస్కామ్ కాస్ట్ అప్ సర్వీస్ కంటే తక్కువగానే ఛార్జీలు వసూలు చేస్తున్నాం టారిఫ్ ఆర్డర్ నిబంధనల ప్రకారం CC బిల్ చెల్లింపు కోసం గడువు తేదీ నుండి 15 రోజులు గడువు ముగిసిన తరువాత వినియోగదారుడు చెల్లించని యెడల సరఫరా డిస్కోనెక్ట్ చేయబడుతుంది.</p> | సం  రం  | ప్రమాదం సంభవించిన వారి సంఖ్య |  |  |  | మరణించిన |  | గాయపడిన |  | మనుషులు | పశువులు | మనుషులు | పశువులు | 2018-19 | 294 | 754 | 21 | 0 | 2019-20 | 258 | 619 | 34 | 0 | 2020-21 | 238 | 517 | 53 | 0 | 2021-22 | 76 | 206 | 21 | 0 |
| సం  రం  | ప్రమాదం సంభవించిన వారి సంఖ్య   |   |         |                              |  |  |  |          |  |         |  |         |         |         |         |         |     |     |    |   |         |     |     |    |   |         |     |     |    |   |         |    |     |    |   |
|         | మరణించిన   |   |         | గాయపడిన                      |  |  |  |          |  |         |  |         |         |         |         |         |     |     |    |   |         |     |     |    |   |         |     |     |    |   |         |    |     |    |   |
|         | మనుషులు  | పశువులు   | మనుషులు | పశువులు                      |  |  |  |          |  |         |  |         |         |         |         |         |     |     |    |   |         |     |     |    |   |         |     |     |    |   |         |    |     |    |   |
| 2018-19 | 294  | 754   | 21      | 0                            |  |  |  |          |  |         |  |         |         |         |         |         |     |     |    |   |         |     |     |    |   |         |     |     |    |   |         |    |     |    |   |
| 2019-20 | 258  | 619   | 34      | 0                            |  |  |  |          |  |         |  |         |         |         |         |         |     |     |    |   |         |     |     |    |   |         |     |     |    |   |         |    |     |    |   |
| 2020-21 | 238  | 517   | 53      | 0                            |  |  |  |          |  |         |  |         |         |         |         |         |     |     |    |   |         |     |     |    |   |         |     |     |    |   |         |    |     |    |   |
| 2021-22 | 76   | 206   | 21      | 0                            |  |  |  |          |  |         |  |         |         |         |         |         |     |     |    |   |         |     |     |    |   |         |     |     |    |   |         |    |     |    |   |

**50. Shashibhushan Kache, Shashibhushan Kache, Member, SAC,TSERC**

|  | Summary of Objections / Suggestions  | Response of the Licensee  |
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|  | <p>క్రమం తప్పకుండా గడువులోగా విద్యుత్ పంపిణీ సంస్థలు సమగ్ర ఆదాయ ఆవశ్యకత సమాచారం (ARR) కమిషన్ కు సమర్పించడంలో జాప్యానికి గల కారణాలు</p> <p>విద్యుత్పంపిణీ సంస్థలు విద్యుత్వినియోగదారులపై చార్జీల పెంపు ప్రతిపాదనల కారణంగా వినియోగదారులు ప్రత్యన్యాయవ్యవస్థలపై ఆధారపడితే పంపిణీ సంస్థలు సంశోభంను ఎదుర్కొన్న అవకాశం ఉంది. కావున చార్జీల పెంపు ప్రతిపాదనను ఉపసంహరించుకోవాలి.</p> | <ul style="list-style-type: none"> <li>● తెలంగాణ అసెంబ్లీ మరియు లోక్సభ ఎన్నికల దృష్ట్యా రాష్ట్రంలో మోడల్ కోడ్ ఆఫ్ కండక్ట్ అమలు.</li> <li>● గౌరవనీయమైన TSERC చైర్మన్ పదవి కాలం ముగియడం వలన, 9 జనవరి 2019 నుండి ERC కార్యచరణ లేదు.</li> <li>● మహమ్మారి COVID-19 వ్యాప్తి కారణంగా GoTS ద్వారా రాష్ట్రంలో లాక్డౌన్ విధించడం జరిగింది.</li> </ul> <p>ఈ పైన తెలిపిన నియంత్రించలేని కారణాల వలన డిస్కామ్ వారు ఏ ఆర్ ఆర్ లను ఆలస్యంగా సమర్పించడం జరిగింది.</p> <p>కాస్ట్ అప్ సర్వీస్ రూ.5.91/unit నుండి రూ.7.14/unit కి పెరగడం వలన మరియు 5 సంవత్సరాల నుండి టారిఫ్ పెంపు లేనందు వలన అనివార్య పరిస్థితుల్లో డిస్కామ్ వారు టారిఫ్ పెంపు ప్రతిపాదనలని ఈ ఆర్ సి వారికి సమర్పించడం జరిగింది.</p> |

**51. [G Ramulu](#), Mobile No.8466901730, 4-45, Nandi Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215**

|  | Summary of Objections / Suggestions  | Response of the Licensee   |
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|  | అయ్యా తమారితో చేయు మనవి ఏమనగా నేను అనగా G రాములు S/o చిన్నయ్య ట్రాన్స్ ఫార్మర్ DD నెంబర్ -NR514213321494 DD కట్టినము ఇంతవరకు ట్రాన్స్ ఫార్మర్ మంజూరు కొరకు ఎలాంటి పనులు జరగడం లేదు ట్రాన్స్ ఫార్మర్ మంజూరు కొరకు చేయగలరు అని మా యొక్క మనవి | ఈ సర్వీసుల కోసం ఎస్టిమేషన్ (ఏ-0573-35-01-13-01-184), మంజూరు అయినది. ట్రాన్స్ఫార్మర్ మరియు మెటీరియల్ తెప్పించి 15రోజులలో పని పూర్తి చేయగలము |

[52. M.Murali Krishna](#), Mob No 8886663605, H.No. G2, Rajput Residency, Old Ramalayam Road, Nallakunta- 500044

[53. Mudhuganti Sridhar Reddy](#) Mob No 9866381090, H.NO. 504/2-1-174&175, Rajput Residency, Nallakunta, Hyderabad - 500044

|  | Summary of Objections / Suggestions   | Response of the Licensee   |
|--|---|--|
|  | <p>హైదరాబాద్ హబ్సిగుడా ADE పరిధిలో విద్యుత్ ప్రమాదంతో మిర్యాల రాంబాబు గారు మరణించడం జరిగింది exgraxia కొరకు అర్జీ పెట్టుకోవడానికి కూడా అతని భార్యకు సరి అయిన సహాయం చేసే వారు లేనందున ఆమె కు సంబంధించిన సమాచారాన్ని ఆమె శ్రోయోభిలాషుల లో ఒకరు భారతీయ కిసాన్ సంఘ్ రాష్ట్ర కార్యాలయానికి అతనికి సంబంధించిన కాగితాలు (ఎఫ్ ఐ ఆర్ పంచనామా రిపోర్టు మొదలైనవి ) అందజేశారు కాగితాలను నేను యం మురళి కృష్ణ ADE కార్యాలయానికి తీసుకువెళ్ళే వారు వారి సిబ్బంది తీసుకోవడానికి తొలుత</p> | <p>మిరియాల రాంబాబు కొరకు కావాల్సిన కుటుంబ సంభ్యుల ధ్రువీకరణ పత్రము మారాయి ధ్రువీకరణ పత్రము motem report fir లను మిరియాల రాంబాబు కుటుంబ సభ్యుల తరుపున మురళి కృష్ణ గారు సమర్పించిన తరువాత తేదీ 04 .02 .2022 నాడు ఎక్స్ గ్రేషియా sanction కొరకు CGM / OP Medchal Zone exgratia sanction చేసినాడు దీని ప్రకారం</p> |

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| <p>నిరాకరించారు ఆ తర్వాత తీసుకొని ఒరిజినల్ తీసుకురమ్మని తెస్తేనే సర్టిఫై చేసి పంపిస్తా అని చెబితే మరోమారు ఒరిజినల్ ADE గారి ఆఫీస్ లో ఒరిజినల్ ఇచ్చి తేదీ 10.01.2022 నాడు రెండు గంటలకు వెళ్లి కూర్చుంటే సాయంత్రం 5 గంటల వరకు కుర్చోబెట్టుకొని తిరిగి తర్వాత రమ్మని తెలిపారు రెండు రోజుల తర్వాత తిరిగి మళ్ళి వ్యక్తిగతంగా రమ్మని తెలిపారు పడే పడే ఎందుకు పిలవడం కాగితారు ఒరిజినల్ అన్ని ఇచ్చిన చూసి సర్టిఫై చేసి ఒరిజినల్ వాపస్ ఇస్తే సరిపోతుంది కదా అని మా కిసాన్ సంఘ్ నాయకులు అడిగితే శ్రీధర్ రెడ్డి TSERC SAC మెంబర్ గా పరిచయం చేసుకొని ) నేవే వచ్చి మాట్లాడు లేకపోతే ఇష్టం వచ్చినట్టు రాసి పంపుతాను అని తెలిపారు బాధితురాలికి చిన్నబాబు ప్రస్తుతం ఆమె గర్భవతి కూడా ఆమెకు కోదాడ నుండి ఇక్కడికి వచ్చే వెసులుబాటు లేకనే BKS</p> | <p>exgratia చెల్లించుటకు తుదిపరి చర్యలకు DE హబ్బిగూడ మరియు ADE హబ్బిగూడ ఆదేశాలు ఇవ్వడం జరిగింది</p> |
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| <p>ను ఆశ్రయించింది మానవతా దృక్పథంతో నో కార్పొరేట్ సోషల్ రెస్పాన్సిబిలిటీతో<br/> నైనా ఆ పేద బాధితురాలికి exgratia ఇప్పించగలరు అని<br/> విన్నవించుకుంటున్నాము బాధితుల / వారి తరపున వచ్చే వారి పట్ల ADE<br/> ప్రవర్తనలో మార్పు కూడా తీసుకు రావాల్సిన అవసరం ఉంది దాని కొరకు కూడా<br/> ఉన్నతాధికారులు ప్రయత్నం చేయగలరని కోరుతున్నాను హైదరాబాద్ సౌత్<br/> సర్కిల్ లో విద్యుత్ వినియోగం ఎంత బిల్ కలెక్షన్ ఎంత లెక్కకు రానిది ఎంత.</p> |  |
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**54. k Kumar, Kuthuru Kumar, Shabad R.R (Dist), Ph: 8712161539**

|  | <b>Summary of Objections / Suggestions</b>   | <b>Response of the Licensee</b>  |
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|  | <p>నేను k . కుమార్ BKS మండల కన్వీనర్ సభ్యుని నా యొక్క సమస్య</p> <p>1) మొగలి లింగం చేనుల ఉన్న 100 KV ట్రాన్స్ ఫార్మర్ దానికి 24 మోటార్లు కలవు దానిపై అధిక భారం పడుతుందందున ప్రతి వారానికి ఒకసారి రిపేర్ వస్తుంది కావున అయొక్క సమస్య ను తీర్చగలరని నయొక్క మనవి 2)ఈ యొక్క ట్రాన్స్ ఫార్మర్ కు ఆస్ ఆఫ్ పనిచేయడం లేదు కావున ధనికుడా సరిచేయగలరని మనవి.3) ఈ యొక్క ట్రాన్స్ ఫార్మర్ నుండి ప్రతి యొక్క లైన్ స్తంభాలు ఒరిగి పోయి ఉన్నాయి కాబటి వాటిని కూడ చేయగలరని మాయొక్క మానవేని స్వీకరించి పెద్ద మనసు సరిచేయగలరని మనవి చేయచున్నాము.</p> | <p>డిటిఆర్ మరియు ఎల్టి లైన్లను పరిశీలించారు, ఫిర్యాదు 7 రోజుల్లో పరిష్కరించబడుతుంది.</p> |

**55. Guvvalapalli Venkatramulu, H.No.6-148, kesava Nagar, Danvada Village, Danvada MdNaryana pet Dist**

|  | Summary of Objections / Suggestions   | Response of the Licensee  |
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|  | <p>నా పేరు గువ్వలపల్లి వెంకట్రాములు s / o కొండన్న గ్రామం ధన్వాడ మండలం ధన్వాడ జిల్లా నారాయణపేట నా యొక్క ఎద్దు విద్యుత్ షాక్ తో మరణించింది తేదీ 09/03/2021 నాడు చనిపోయినది నాకు ఇంత వరకు తక్షణ సాయం అందలేదు ఎద్దు చనిపోయినందున వ్యవసాయం చెయ్యడానికి చాల కష్టంగా ఒక్క ఎద్దు తో వ్యవసాయం చేస్తున్నాను నాకు వెంటనే తక్షణ సాయం అందిస్తే మరల క్రొత్తగా ఎద్దుని కొని వ్యవసాయం చేయదని అనుగుణంగా నేను ఆర్థికంగా పేదరైతును కావున వెంటనే తక్షణ సాయం అందించి నాకు న్యాయం చేయగలరని నా యొక్క</p> | <p>Rs.40000/- నష్టపరిహారం ఇవ్వడానికి LOC NO.10019033, Dt:08.02.2022, పంపడము జరిగినది. వచ్చిన వెంటనే లబ్ధి దారునికి ఇవ్వడము జరుగును.</p> |



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|  | మనవి నాకు విద్యుత్ కార్యాలయం ఇచ్చిన ID నెంబర్ MBR 1150821 ఇచ్చినారు |  |
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**56. S Swamy, Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215**

|  | Summary of Objections / Suggestions   | Response of the Licensee  |
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|  | <p>సంగిశెట్టి స్వామి S / o చిన్న మాసయ్య R / o వడ్డేమాన్ బిజ్జిపల్లి<br/>నగర్ కర్నూల్ సర్వే నెం 111301897 నాగేశ్వరమ్మ 111301898<br/>కురుమూర్తి 111301899 స్వామి 111301990 తిరుపతమ్మ మా యొక్క<br/>DTR LT లైన్ పూర్తిగా పని చేయ లేదు</p> | <p>ఎస్టీ మెట్ నే. ఏ 0483-35-01-13-01-109 ద్వారా పోల్స్<br/>మరియు వీరు మంజరి చేయబడింది దీని ప్రకారం నాలుగు పోల్స్<br/>వైరు ఇవ్వడం జరిగింది ప్రస్తుతం వారి చేతు ఉన్నందున వల్ల పని<br/>పూర్తి చేయ లేదు వారి కోత అయినా తరువాత పని పూర్తి<br/>చేయడం జరుగుతుంది</p> |

**57. [Pyat Anjaneyulu, Vaddeman \(Vill\), Bijanapally \(M\) Nagar Kurnool 509 215](#)**

|  | Summary of Objections / Suggestions   | Response of the Licensee  |
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|  | <p>తమారితో చేయు మనవి ఏమనగా నేను అనగా ప్యాట ఆంజనేయులు S / o కుర్మయ్య SC No 994 LT లైన్ కెఫిర్ వైర్లు పలుమార్లు తెగి పొలాల్లో పడింది దానికి మరమత్తులు చేసి మరల వానికే వినియోగిస్తున్నాము వైరు తెగిన సమయంలో రైతులు మూగ జీవాలకు ప్రమాదం తప్పింది నాణ్యత లోపించి కేలంచెల్లిన వైర్లు అందరు ఇబ్బందులు ఏయర్కు వలసి వస్తుంది కావున దీనికి తగిన పరిస్కారాని సూచిస్తూ దాని స్థాననం లో కొత్త వైర్లు మంజురు చేయగలరని మా యొక్క మనవి (DTR కుప్పుసారం కుంట వెనకాల )</p> | <p>ఇప్పటికే ఉన్న ఎల్ టి లైన్ చాల కాలం క్రితం వేయబడింది అయితే వినియోగదారుడు తన ఇంటిని ఎల్ టి లైన్ కి దగ్గరగా నిర్మించుకున్నాడు పాలు పిప్టింగ్ చార్జీలు కట్టిన మెడల పాలు ప్రక్కకు జరుపడం జరుగుతుందని వినియోగదారునికి తెలుపడం జరిగినది</p> |

**58. Gandla Chandraiah, H.No. 5-15,Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215**

|  | Summary of Objections / Suggestions  | Response of the Licensee  |
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|  | <p>తమతో చేయు మనవి ఏమనగా నేను అనగా గాండ్ల చంద్రయ్య S/o చిన్న కురువయ్య R/o నంది వడ్డేమాన్ గ్రామం బిజినాపల్లి మం నాగర్కర్నూల్ జిల్లా వానిని మా గ్రామములు ఒక సబ్ స్టేషన్ ఉంది కానీ కాలువల ద్వారా నీళ్లు రావడము వాళ్ళ గ్రామములు ట్రాన్స్ పారాల సంఖ్య చాల ఎక్కువగా కావడము జరిగింది బోర్ డ్ డ్ ల సంఖ్య చాల ఎక్కువ అయినవి అందు వలన ఉన్న సబ్బు స్టేషన్ నుంచి సీరం తక్కువ రావడము వాళ్ళ నోర్ మోటార్స్ ట్రాన్స్ ఫారములు కాళిపోవడము జరుగుతుంది ఇంతే కాదు చల్లి చాలన్న నష్టాల వాళ్ళ రైతులు రాత్రి వెళ్లలో పొలానికి వెళ్ళడము వాళ్ళ రకరకాల కారణం వాళ్ళ ఏంట్లో మంది రైతులు ప్రాణాలు పోయిన సంగతి మీకు తెలిసిందే కావున మా యొక్క సబ్బు స్టేషన్ కెపాసిటీ పెంచి మా గ్రామా రైతులను ఆదుకోగలరాన్ని మనవి</p> | <p>33 / 11 కే వి నంది వడ్డేమాన్ సబ్ స్టేషన్ లో ప్రస్తుతం రెండు ఫీడర్ ట్రాన్స్ ఫార్మర్ ఉన్నవి వీటి మీద 500 వరకు లోడును ఉపయోగించుకోవచ్చు ఇప్పుడు 270 మాత్రమే ఉన్నది ఆర్థిక లోడు లేదు కావున సబ్ స్టేషన్ కెపాసిటీ ని పెంచనవసరం లేదు</p> |

**59. Sangi Shetti Chinna, Nandi Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215**

|  | Summary of Objections / Suggestions  | Response of the Licensee   |
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|  | <p>సంగిశెట్టి చిన్న కురుమూర్తి S/o పెద్ద మాసయ్య R/o వడ్డేమాన్ గ్రామం బిజినాపల్లి మం నగర్ కుర్నూక్ జిల్లా మా యొక్క పొలం లోని లూజు లైన్ సరిచేయుటకు నాటినారు సంవత్సరం అయినది ఇప్పటికి వాటిని స్తంభానికి కనెక్షన్ ఇవ్వలేదు వైర్లు వెలడుతున్నది. మాయొక్క DTR 100 kv చాల కనెక్షన్ లు అయినది తరుచు రిపేర్ అయితున్నది ఈ DTR యొక్క LT కనెక్షన్ లు దాదాపు 40 సంవత్సరాలు అయిన ప్రతియొక్క LT లైన్ లూజుగా వున్నవి విటిని సరిచేయగలరు</p> | <p>పొలంలో నాటిన స్తంభమునకు లైను బిగించి లూజు లైను సరిచేయడం జరిగినది.</p> |

**60. Katta Venkat Reddy, S/o Mohan Reddy H.No.7-4-44, Nalgonda**

|  | Summary of Objections / Suggestions   | Response of the Licensee   |
|--|---|--|
|  | <p>నేను అనగా కట్టె వెంకట్ రెడ్డి S/o మోహన్ రెడ్డి గ్రా పానగల్ల జిల్లా మం నల్లగొండ అయిన మా దగ్గర ట్రాన్స్ ఫార్మర్ మరియు కరెంటు సమస్యలు</p> <p>1) ట్రాన్స్ ఫార్మర్ నెం SS 20 యందు ON Off స్విచ్ పని చేయుటలేదు ఏదైనా సమస్య వస్తే AB స్విచ్ పని చేయక పోవటం వలన సబ్ స్టేషన్ కు ఫోన్ చేయవలసి వస్తే ఈ సమస్య గత పది సంవత్సరాల నుండి ఉంది అనేక సార్లు కరెంటు వాళ్లకు చెప్పిన పట్టించు కోలేదు</p> <p>2) ట్రాన్స్ ఫార్మర్ కాలితే రైతులే ట్రాక్టర్ మీద తీసుకురమ్మని చెప్పుచున్నారు మరియు ట్రాన్స్ ఫార్మర్ ట్రాక్టర్ మీద నుండి దించినందుకు ఎత్తినందుకు డబ్బులు తీసుకుంటున్నారు</p> <p>3) ట్రాన్స్ ఫార్మర్ మీద ఫీజు పోయినచో లైన్ మెన్ గాని AE గాని వెంటనే స్పందించుట లేదు</p> | <p>1) SS - 20 ట్రాన్స్ఫార్ మర్ AB స్విచ్ యొక్క 1 పాడైపోయిన ఫీజ్ మరియు మూవింగ్ కాంట్రాక్టుని కొత్తవాటితో మార్చి AB స్విచ్ ని మరమ్మతు చేయడము జరిగినది</p> <p>2) కాలిపోయిన ట్రాన్స్ఫార్మర్స్ అన్నియు సంస్థ వాహనంలోనే తీసుకురావడం జరుగుతున్నది.అరుదుగా ఎప్పుడైనా ఒకేరోజు కాలిపోయిన ట్రాన్స్ఫార్మర్స్ ఒకటికి మించి .వున్నప్పుడు మాత్రమే వినియోగదారుల వాహనంలో కాలిపోయిన ట్రాన్స్ఫార్మర్ తీసుకురావడం జరిగి ఉంటుంది.ట్రాన్స్ఫార్మర్ ని ఎత్తినందుకు</p> |

**60. Katta Venkat Reddy, S/o Mohan Reddy H.No.7-4-44, Nalgonda**

| Summary of Objections / Suggestions   | Response of the Licensee   |
|---|--|
| <p>4)లైన్లు చాల క్రిందికి వున్నవి స్తంభాలు వారిగినవి ఇట్టి విషయాన్నీ అనేక సార్లు వాళ్ళకు చెప్పినప్పటికీ వారు స్పందించుటలేదు</p> | <p>మరియు దించినందుకు ఎటువంటి డబ్బులు తీసుకోవడం లేదు అన్ని SPM పెడ్ ల వద్ద డబ్బులు చెల్లించనవసరం లేదని బోర్డ్స్ కూడా ఏర్పాటు చేయడము జరిగింది</p> <p>3) ట్రాన్స్ఫార్మర్ మీద ఫుట్ పోయినప్పుడు O&amp;M సిబ్బంది ద్వారా వేయడము జరుగుతున్నది</p> <p>4) విరిగిన స్తంభములు మార్చడం జరిగింది. లైను కిందికి వున్న చోట్ల మధ్యంతర స్తంభములు ఏరపాటుకు అంచనా వేయడము జరిగినది ఒక నెలలో లైన్స్ సరిచేయబడును</p> |

**61. Naomula Siddi Reddy, Amdapur Villagem Moinabad (Mandal), Ranga Reddy (dist)**

|  | Summary of Objections / Suggestions   | Response of the Licensee         |
|--|---|----------------------------------|
|  | <p>నేను నోముల సిద్దిరెడ్డి నర్సింహ రెడ్డి నివాసము ఆమ్లాపూర్ గ్రామము మొయినాబాద్ మండలం రంగ రెడ్డి జిల్లా నాకు ఆమ్లాపూర్ గ్రామ రెవిన్యూ లో పొలము నందు hightention poles వేసినారు నాకు నష్టపరిహారం కింద 183000 /- లక్ష ఎను బై మూడు వేయిల రూపాయలు మాత్రమే ఇచ్చినారు నాకు 10 లక్షల రూపాయలు ఇస్తామని ఇవ్వలేదు నాకు రావలసిన మిగతా రూపాయలు ఇపించ గలరని నా యొక్క మనవి</p> | <p>TSTRANSCO కి సంబంధించినది</p> |



**62. Sama Narayan Reddy, Amlapur, Moinabad, R.R.Dist**

|  | <b>Summary of Objections / Suggestions</b>  | <b>Response of the Licensee</b>  |
|--|---|----------------------------------|
|  | <p>నేను సామ నారాయన్ రెడ్డి మల్లా రెడ్డి నివాసము ఆమ్లాపూర్ గ్రామము మొయినాబాద్ మండలం రంగారెడ్డి జిల్లా నా యొక్క సమస్య ఏమనగా నా యొక్క పొలము AGL సర్వీస్ కనెక్షన్ ఉన్నది కానీ దీని మీద లోడు ఎక్కువగా ఉన్నందున ట్రాన్స్ ఫార్మరు మీద ఫీజులు పోవడం జరిగినది దేని పై విద్యుత్ అధికారులకు ఎన్ని సార్లు చెప్పిన పట్టించుకోవడం లేదు ఈ యొక్క ట్రాన్స్ ఫార్మర్ 100 KV DTR ఉండగా నడవడం లేదు ౨ రోజులకు ఒక్క సారి ఫీజు పోవడం జరుగుతున్నది దీని పై చర్య తీసుకొని ట్రాన్స్ ఫార్మర్ మార్చడమైన చేయించ గలరని నా యొక్క మనవి మా ఆమ్లాపూర్ గ్రామములో HIGH TENTION వీరేష మరియు పోల్స్ గురించి నేను మా ఉరి రైతులను తీసుకుని ఈ యొక్క hightention పోల్స్ కు సంబంధి అధికారులను విన్నవించుకున్నా స్పందన లేదు.</p> | <p>TSTRANSCO కి సంబంధించినది</p> |

**63. M.Venkataiah, Mitta kanakal village, pudur md, vikarabad Dist**

|  | Summary of Objections / Suggestions   | Response of the Licensee         |
|--|---|----------------------------------|
|  | <p>నేను మధ్య పాగ వెంకటయ్య late లక్ష్మయ్య నివాసము ఆమ్లాపూర్ గ్రామము మొయినాబాద్ మండలం రంగారెడ్డి జిల్లాఆమ్లాపూర్ గ్రామ రెవిన్యూ లో sy No 151 గల భూమిలో hightention poles వేసినారు దీనికి గాను నాకు నష్టపరిహారం 60000 /- అరవైయిల రూపాయలు మాత్రమే ఇచ్చినారు వేరే వాళ్ళకు అంటే oc మరియు BC లకు 4 లక్షల వరకు ఇచ్చినారు నేను మాదిగా కులానికి ( SC ) చెంది వాన్నికాబట్టి నాకు తక్కువగా ఇచ్చినారు నాకు ఉన్న కొంచెం భూమి మొత్తం పోయినది కనుక బతకడానికి చాల కష్టంగా ఉందది కావున నాకు 10 లక్షల రూపాయలు నష్టపరిహారం ఎపించి నన్ను ఆదు కోగలరని నా యొక్క మనవి</p> | <p>TSTRANSCO కి సంబంధించినది</p> |

**64. Godasu Laxmi Narayana, Amdapur Villagem Moinabad (Mandal), Ranga Reddy (dist)**

|  | Summary of Objections / Suggestions   | Response of the Licensee         |
|--|---|----------------------------------|
|  | <p>నేను గోదాసు లక్ష్మి నారాయణ S / o late అంజయ్య నివాసము ఆమ్లాపూర్ మొయినాబాద్ మండలం రంగారెడ్డి జిల్లామా యొక్క ఆమ్లాపూర్ గ్రామా రెవిన్యూ లో నా పొలము పై నుంచి HighTension wires పోయినాయి. నాకు నష్ట పరిహారం తక్కువగా అంటే 50 వేయిల రూపాయిలు ఇచ్చినారు. 5 లక్షలు ఇస్తామని ఇవ్వకుండా పోయినారు ఈయొక్క నష్ట పరిహారం ఇప్పించగలరని నా యొక్క మనవి.</p> | <p>TSTRANSCO కి సంబంధించినది</p> |

**65. Kolla Shanthamma, W/o Late Maisaiah, Amdapur Village, Moinabad (Mandal), Ranga Reddy (dist)**

|  | Summary of Objections / Suggestions  | Response of the Licensee         |
|--|--|----------------------------------|
|  | <p>నేను కోళ్ళ శాంతమ్మ S/o late మైసయ్య నివాసము ఆమ్లాపూర్ గ్రామము మొయినాబాద్ మండలం రంగారెడ్డి జిల్లా ఆమ్లాపూర్ గ్రామ రెవెన్యూ sy .No 151 గల నాపొలంలో hightention poles వేసినారు దీనికి గాను నాకు నష్టపరిహారం 60000/- అరవైయిల రూపాయలు మాత్రమే ఇచ్చినారు వేరే వాళ్ళకు అంటే oc మరియు BC లకు 4 లక్షల వరకు ఇచ్చినారు నాకు మాత్రం 60,000/- రూపాయలు ఇచ్చినారు నేను మాదిగా కులానికి ( SC ) చెంది వాన్ని కాబట్టి నాకు తక్కువగా ఇచ్చినారు. నాకు ఉన్న కొంచం భూమి మొత్తం పోయినది కావున నాకు బతకడానికి చాల కష్టంగా ఉన్నది కావున నాకు 10 లక్షల రూపాయలు నష్టపరిహారం ఎపించి నన్ను ఆదు కోగలరని నా యొక్క మనవి.</p> | <p>TSTRANSCO కి సంబంధించినది</p> |

**66. G Ram Reddy, Marpalli, vikarabad**

| Summary of Objections / Suggestions  | Response of the Licensee         |
|--|----------------------------------|
| <p>నేను గొల్లపల్లి రాంరెడ్డి S / o late బీమ్ రెడ్డి నివాసము ఆమ్లాపూర్ గ్రామము మొయినాబాద్ మండలం రంగారెడ్డి నా యొక్క పొలము మీద నుంచి 400 kv లైన్లు ( హై టెన్షన్ వైర్లు ) పోయినాయి నా పొలములో నుంచి లారీలు మరియు ట్రాక్టర్లు పోయినాయి అందు చేత నా పొలములో గులాబీ చెట్లు అనియు కర్రబైనవి దీనికి నాకు లాసు 500000 అయిదు లక్షల పైనే నష్టము జరిగినది కానీ నాకు 120000 /- లక్ష ఇరువై వెయిలు మాత్రమే ఇచ్చినారు నాకు 5 లక్షల నుంచి 7 లక్షల వరకు నష్టము జరిగినది ఈ నష్ట పరిహారము ఇప్పించగలరని నా యొక్క మనవి పొలము సర్వే no 180.</p> | <p>TSTRANSCO కి సంబంధించినది</p> |

**67. Nomula Vichitra, D/o Late Rangareddy, Amdapur Village, Moinabad (Mandal), Ranga Reddy (dist)**

| <b>Summary of Objections / Suggestions</b>  | <b>Response of the Licensee</b>  |
|---|----------------------------------|
| <p>నేను నోముల విచిత్ర late రంగారెడ్డి గ్రామము ఆవ్లాపూర్ మొయినాబాద్ మండలం రంగారెడ్డి జిల్లామా ఆవ్లాపూర్ గ్రామ రెవిన్యూ లో నా పొలము పై నుంచి hightention wires పోయినాయి నాకు ఉన్న రెండుం న్నర ఎకరాల పొలము మధ్య నుంచి hightention wires పోయినాయి ఈ wires వెనుక ముందు నష్టపరిహారం ఇస్తామని చెప్పి నన్ను నమ్మించినారు పని అయిపోయిన తరువాత ఒక్క రూపాయి కూడా ఇవ్వలేదు ఏన్నిసార్లు ఫోన్ చేసినా సంబంధిత అధికారులు స్పందించడం లేదు నాకు 10 లక్షల నష్టపరిహారం ఇస్తామని మోసం చేసినారు వారి పై చెర్య తీసికొని నాకు వారు ఇస్తామన్న నష్టపరిహారం ఇప్పించగలరని తమారితో మనవి చేసుకుంటున్నాము.</p> | <p>TSTRANSCO కి సంబంధించినది</p> |

**68. Nedunuri Narsimha Reddy , S/o Late Venkat Ramreddy, Amdapur Village, Moinabad (Mandal), Ranga Reddy (dist)**

|  | Summary of Objections / Suggestions  | Response of the Licensee         |
|--|--|----------------------------------|
|  | <p>నేను నెడుమారి నర్సింహ రెడ్డి late వెంకట్ రాం రెడ్డి నివాసము ఆమ్లాపూర్ గ్రామము మొయినాబాద్ మండలం రంగారెడ్డి జిల్లాఆమ్లాపూర్ గ్రామ రెవిన్యూ లో నా యొక్క పొలము పై నుంచి hightention wires పోయినాయి నము దీనితో అనరోగ్య సమస్యలు వస్తున్నాయి నాకు చాలా తక్కువ నష్ట పరిహారం ఇచ్చినారు నాకు ఇంకా 5 లక్షల వరకు నష్టపరిహారం రావాలి ఇవ్వకుండా వెళ్లి పోయినారు.తమరు మా పై దయదలచి మిగతా డబ్బులు ఎపించ గలరని నా యొక్క మనవి .</p> | <p>TSTRANSCO కి సంబంధించినది</p> |

**69. G Bendra Reddy, Moinabad Mandal RangaReddy**

|  | Summary of Objections / Suggestions   | Response of the Licensee         |
|--|---|----------------------------------|
|  | <p>గొల్లపల్లి చంద్రా రెడ్డి S/o late సాయి రెడ్డి నివాసము అమాపూర్ గ్రామము మొయినాబాద్ మండలం రంగారెడ్డి జిల్లాఅమాపూర్ గ్రామా రెవిన్యూ లో నా యొక్క పొలము పై నుంచి high tension విర్స్ పోయినాయి నాకు నష్టపరిహారం తక్కువగా ఇచ్చినారు నాకు ఇంకా 5 లక్షలు ఇవ్వ కుండా వెళ్లి పోయినారునాకు ఇప్పించగలరని నా యొక్క మనవి</p> | <p>TSTRANSCO కి సంబంధించినది</p> |



**70. B Satyanarayana Reddy, Cherlaguda, Shabad, RR Dist**

|  | <b>Summary of Objections / Suggestions</b>   | <b>Response of the Licensee</b>                     |
|--|--|---|
|  | <p>నేను అనగా గిరుడ్డి సత్యనారాయణరెడ్డి BKS జిల్లా కార్యవర్గ సభ్యుడిని విషయము ఏమనగా రంగారెడ్డి జిల్లా చేవెళ్ల మండలంలో మా యొక్క రైతు సోదరులు అర్జిపెట్టుకున్న విద్యుత్ సప్లై 500 మందికి మీరు సప్లై ఇవ్వడానికి దాదాపుగా 2 నుండి 3 సంవత్సరాలుగా సమయం అవుతుంది పని ఆలస్యము చేసినందున ధరలు పెరిగాయంత అదనంగా శ్రమ డబ్బులు రైతుల పై వేస్తున్నారు ఎందుకోసం ఆలస్యం చేస్తున్నారు అంటే జవాబు లేదు ఇది కాంట్రాక్టర్లకు లాభం చేయడానికి అని నా యొక్క అనుమానం విడిదవిధానాల ప్రకారం ఒక్క రైతు విద్యుత్ కనెక్షన్ కై 2 నుండి 3 సం !! దిగవలసిన సరే ఒకవేళ ఎందుకు ఆలస్యము జరుగుచున్నది మా యొక్క భారతీయ కిసాన్ సంగం సంఘానికి వ్రాతపూర్వకంగా వ్రాహిస్తే మేము ప్రభుత్వం ద్రుస్తికి తీసుకు వెళతామని కాలయాపన చేయకుండా ఇబ్బందులు లేకుండా రైతులకు భారంవేయకుండా విద్యుత్ సప్లై చేయవలసిందిగా కోరుచున్నాము</p> | <p>కార్పొరేట్ కార్యాలయానికి సంబంధించిన ఫిర్యాదు</p> |

**71. [Kyathanpally Ashappa](#), S/o Balappa, Pallabujurg Village, Narayanpeta Mandal, Narayanpeta District**

|  | <b>Summary of Objections / Suggestions</b>  | <b>Response of the Licensee</b>  |
|--|---|--|
|  | <p>నాపేరు క్యాతాన్ పల్లి ఆశప్ప బాలప్ప గ్రామం నారాయణపేట మండలం నారాయణపేట జిల్లా నారాయణపేట నా యొక్క ఎద్దు విద్యుత్ షాక్ తో చనిపోయినది నాకు ఇప్పటివరకు ఆర్థిక సాయం అందలేదు ఎద్దు చనిపోయినందున వ్యవసాయం భారంగా ఉంది నా యొక్క ఎద్దు 2019 సంవత్సరం చనిపోయినది నాకు కరెంటు ఆఫీస్ లో ఒక నెంబర్ ఇచ్చినారు ఆ నెంబర్ MBR0410619 దయచేసి నాకు ఆర్థిక సాయం అందించి నాకు న్యాయం చేయగలరని నా యొక్క ప్రార్థన.</p> | <p>పై కార్యాలము నుండి రిమార్కులు అడిగినారు. దానికి జవాబు పంపడం జరిగినది. మంజూరు అయిన వెంటనే వెంటనే లబ్ధి దారునికి ఇవ్వడము జరుగును.</p> |

**72. Deshetti Thirupathi, S/o Venkat Reddy, Pullur Vill & Post, Siddipet Rural, Siddipet Dist - 502107**

|  | <b>Summary of Objections / Suggestions</b>  | <b>Response of the Licensee</b>   |
|--|---|---|
|  | <p>సిద్దిపేట జిల్లా సిద్దిపేట రురల్ మండలం పుచర్లు గ్రామంలోని నాగుకుంటకు అనుకోని ఉన్న ట్రాన్స్ ఫార్మర్ నాగులకుంట నిండి నందున నీళ్ళలోనే ట్రాన్స్ ఫార్మర్ ఉంది దీని వాళ్ళ రైతులకు ప్రాణ భయం ఉంది చాల కరెంటు సమస్యలు వస్తున్నాయి కావున దయచేసి వీళ్ళో ఉన్న ట్రాన్స్ ఫార్మర్ ను వేరే చోటికి మార్చగలరని మనవి ఈ ట్రాన్స్ ఫార్మర్ పై 25 బావులు ఉన్నందున కొత్త 25 HP ట్రాన్స్ ఫార్మర్ మంజూరు చేయాలనీ విన్నపం.</p> | <p>దీనికై సర్వే నిర్వహింపబడినది . అంచనా తయారు చేసి 30 రోజులలో పని పూర్తి చేస్తాము .</p> |

**73. Gadipe Narsing Rao, Siddipet**

|  | <b>Summary of Objections / Suggestions</b>  | <b>Response of the Licensee</b>   |
|--|---|---|
|  | <p>ఇండ్ల మధ్యలో ఉన్న ట్రాన్స్ ఫార్మర్ తొలగించగలరని మనవి మనుషుల ప్రాణాలకు హరికరముగా ఉన్నది కావున మాయందు దయతలచి హుస్సాబాద్ బస్ డిపో వెనుక కాలనిలో ఉన్న ట్రాన్స్ ఫార్మర్ తొలగించగలరని విజ్ఞప్తి చేస్తున్నాము</p> | <p>దీనికై సర్వే నిర్వహింపబడినది . అంచనా తయారు చేసి 30 రోజులలో పని పూర్తి చేస్తాము .</p> |

**74. K yadagiri, S/o Satyanarayan, shabad**

| Summary of Objections / Suggestions  | Response of the Licensee   |
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| <p>కుర్త యాదగిరి S/o సత్యనారాయణ అనునేను గ్రామము షాబాద్ నేను<br/>వ్యవసాయము చేసుకుంటున్నాను నా యొక్క ట్రాన్స్ ఫార్మర్ కాలిపోయింది<br/>తీసుకుని పోయిన షాబాద్ లో T నోటుకు 200 /- చేవెళ్లలో T నోటుకు 400<br/>/- వర్క్ షాపులో క్రేక్ ఫీజు ఎక్కియడానికి దించడానికే 600 /-<br/>తీసుకుంటున్నారు జర రేటు తగ్గించగలరని నా యొక్క మనవి మమ్ములను<br/>ఇబ్బంది పెట్టకుండ చూడాలని నా యొక్క మనవి</p> | <p>వినియోగదారుడిని చెరవాణి ద్వారా సప్రదించగా అతను<br/>ఎవరికి డబ్బులు ఇచ్చారో, వారి పేరు వివరాలు తెలపడం<br/>లేదు. మా సిబ్బందిని విచారించగా వారు ఎవరి దగ్గర<br/>డబ్బులు తీసుకోలేదు అని చెప్పారు.</p> |

**75. Sooram Laxmi, w/o Yadaiah kothlapur**

|  | <b>Summary of Objections / Suggestions</b>   | <b>Response of the Licensee</b>  |
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|  | 11 KV కరెంట్ మా ఇండ్ల పై నుంచి వేయడం జరిగింది కావున మాకు ఇబ్బంది కలగకుండా చేయగలరని మనవి. | మీ సమస్య ను దగ్గర్లో ఉన్న సబ్ డివిజన్ ఆఫీస్ లెదా సి .ఎస్ .సి లో ఫిర్యాదు చెయ్యగలరు |

**76. Gandla Chandraiah, H.No. 5-15,Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215**

|  | Summary of Objections / Suggestions   | Response of the Licensee  |
|--|---|---|
|  | <p>తమతో చేయు మనవి ఏమనగా నేను అనగా గాండ్ల చంద్రయ్య S/o చిన్న కురువయ్య R/o నంది వడ్డేమాన్ గ్రామం బిజినాపల్లి మం నాగర్కర్నూల్ జిల్లా వానిని మా గ్రామములు ఒక సబ్ స్టేషన్ ఉంది కానీ కాలువల ద్వారా నీళ్లు రావడము వాళ్ళ గ్రామములు ట్రాన్స్ పారాల సంఖ్య చాల ఎక్కువగా కావడము జరిగింది బోర్ డ్ డ్ ల సంఖ్య చాల ఎక్కువ అయినవి అందు వలన ఉన్న సబ్ స్టేషన్ నుంచి సీరం తక్కువ రావడము వాళ్ళ నోర్ మోటార్స్ ట్రాన్స్ ఫారములు కాలిపోవడము జరుగుతుంది ఇంతే కాదు చల్లి చాలన్న నష్టాల వాళ్ళ రైతులు రాత్రి వెళ్ళాలో పొలానికి వెళ్ళడము వాళ్ళ రకరకాల కారణం వాళ్ళ ఏంటో మంది రైతులు ప్రాణాలు పోయిన సంగతి మీకు తెలిసిందే కావున మా యొక్క సబ్ స్టేషన్ కెపాసిటీ పెంచి మా గ్రామా రైతులను ఆదుకోగలరాన్ని మనవి</p> | <p>33 / 11 కే వి నంది వడ్డేమాన్ సబ్ స్టేషన్ లో ప్రస్తుతం రెండు ఫీడర్ ట్రాన్స్ ఫార్మర్ ఉన్నవి వీటి మీద 500 వరకు లోడును ఉపయోగించుకోవచ్చు ఇప్పుడు 270 మాత్రమే ఉన్నది ఆర్థిక లోడు లేదు కావున సబ్ స్టేషన్ కెపాసిటీ ని పెంచనవసరం లేదు</p> |

**77. Gandla Chandraiah , S/o Chinna Kurumaiah, 5-15, Nandi Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215**

|  | Summary of Objections / Suggestions   | Response of the Licensee   |
|--|---|--|
|  | <p>నేను అనగా గాండ్ల చంద్రయ్య BKS జిల్లా కార్యదరిని విషయము ఏమనగా నాగర్కర్నూల్ జిల్లా ప్రతి మండలం రైతులు ఎవరైనా క్రొత్తగా dd లు కట్టిన చాల వరకు పనులు రైతుల చేత చేయిస్తున్నారు ex స్తంబాలు DTR ట్రాన్స్ పరము లాంటివి రైతులను తీసుకోవోమని చెప్పాడాము జరుగుతుంది ఇంతే కాదు దేమే కూడా రైతుల చేత కట్టించడము మరియు ట్రాన్స్ పారలు కాలిపోయిన్నపుడు T నో స్థానిక AE గారి దగ్గరా రైతులులే రాయించుకొని పోతున్నారు ఎక్స్ పీజ్ తీసుకోవడము ఇవి అన్ని రైతులు తెలిసి తెలియక పై పనులు చేసేటప్పుడు చాల మంది రైతులు ప్రాణాలు పోతున్న సంగతి మీకు తెలిసిందే కదా ఐ నుంచి రైతులను వీటి అన్నింటి నుంచి కాపాడుతూ ఇక నుంచి అయినా ఇట్టి పనులు రైతుల చేత చేయించకుండా రైతుల ప్రాణాలు కాపాడవలసిందిగా మనవి</p> | <p>కొత్తగా డి. డి లు చెల్లించిన రైతులకు స్తంబాలు ట్రాన్స్ ఫార్మర్లు సంబంధిత కాంట్రాక్టర్లు రైతు పొలం దగ్గరకు తీసుకెళ్లి పనులు చేస్తున్నారు. రైతులతో ఎలాంటి రవాణా చేయించకూడదని హెచ్చరించడం జరిగింది</p> |



**78. Chakali Venkatesh, 6-63, utkoor mandal, Narayan pet**

|  | <b>Summary of Objections / Suggestions</b>  | <b>Response of the Licensee</b>   |
|--|---|---|
|  | <p>నాపేరు చాకలి వెంకటేశ్ S/o చాకలి రంగన్న గ్రామం ఉట్నూర్ మండలం ఉట్నూర్ జిల్లా నారాయణపేట నా యొక్క 3 ఆవులు 1 ఎద్దు విద్యుత్ షాక్ తో మరణించినవి తేదీ 24/5/19 నాడు చనిపోయినవి నాకు ఇంటవరకు తక్షణ సాయం అందలేదు మేము పశువులపై ఆధారపడి బ్రతికేవారం నాకు వెంటనే తక్షణ సాయం అందిస్తే మరల క్రొత్తగా ఆవులను కొని నా ఉపాధిని కొనసాగిస్తాను నేను ఆర్థికంగా పేదవాడిని కావున వెంటనే తక్షణసాయం అందించి నాకు న్యాయం చేయగలరని నా యొక్క మనవి నాకు విద్యుత్ కార్యాలయం ఇచ్చిన ID నెంబర్ MBR0468720</p> | <p>పై కార్యాలయం నుండి రిమార్కులు అడిగినారు. దానికి జవాబు పంపడం జరిగినది Vide Lr.No.SE/OP/MBNR/DE(T)/ADE(T)/AE(T)/F.No.8/D.No.2741, dt: 27.1.2022 మంజూరు అయిన వెంటనే లబ్ధి దారునికి ఇవ్వడము జరుగును.</p> |

**79. Appali Surrender, Thallapally, Shabad**

|  | <b>Summary of Objections / Suggestions</b>   | <b>Response of the Licensee</b>      |
|--|--|--------------------------------------|
|  | <p>నేను అనగా A. సురేందర్ S /o రాంచంద్రయ్య మా ఒక్క మా దెగ్గర చాల కరెంటు సమస్యలు చాల ఉన్నవి ట్రాన్స్ఫారం on / off లేదు స్టబ్ లు బొరుగు ఉన్నాయి లుబీల ఉన్నాయి కొన్ని wires క్యాసర్ల పైకెలి ముడిపడ్డాయి ఈ సమస్య పరికిస్తే చాలు ఒక మనవి</p> | <p>వినియోగదారుడు స్పందించడం లేదు</p> |

**80. T Satyanarayana, Thallapally, Shabad**

|  | <b>Summary of Objections / Suggestions</b>   | <b>Response of the Licensee</b>   |
|--|--|---|
|  | <p>నేను అనగా తబ్బల సత్యనారాయణ సెర్వీస్ no 22 మా దగ్గర కరెంటు సమస్యలు బాగా ఉన్నాయి దగ్గర వైరు చాలా దూరమ్ ఉన్నాయి కావున మాకు చాలా కరెంటు సమస్యలు వస్తున్నాయి మాకు ఒక లైన్ స్తంభాలు కావాలి మా ఒక్క మనవి</p> | <p>ఇప్పటికే ఉన్న వ్యవసాయ సర్వీస్ నం: 5100900732 తేది. 23-05-2018 న NR151182294064 ద్వారా రిజిస్టర్ చేయబడింది, దీని కోసం WBS ఎలిమెంట్ నంబర్: A049665011202007 ద్వారా అంచనా వేయబడింది, అదే అమలు చేయబడింది మరియు అంచనా ప్రకారం సర్వీస్ విడుదల చేయబడింది. ఇప్పుడు వినియోగదారుని అదనపు LT పోల్ కోసం అభ్యర్థించారు.</p> |

**81. Ch Papaiah, Thallapally, Shabad**

|  | <b>Summary of Objections / Suggestions</b>   | <b>Response of the Licensee</b>   |
|--|--|---|
|  | <p>నేను ch పాపయ్య నాబక్క చేనులో ఉన్న సర్వే నెంబర్ 114 నెంబర్ లో ఉన్న బోరును సర్వీస్ వైర్ తో నడిపిస్తున్నాము కావున మాకు రెండు స్తంభాలు దానికి సంబంధించిన దానికి కావలసిన మెటీరియల్ తో మాకు లైన్ వేసి ఇవ్వగలరని మా యొక్క మనవి</p> | <p>5 నం. HT పోల్ లు మరియు ట్రాన్స్ ఫార్మరు ను మార్చడం కొరకు వినియోగదారుడి నుండి సమ్మతి లేఖను సమర్పించాలి.</p> |

**82. [G Anjaneyulu](#) , S/o Chennaiah, Nandi Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215**

|  | Summary of Objections / Suggestions  | Response of the Licensee  |
|--|--|---|
|  | <p>అయ్యా తమారితో చేయు మనవి ఏమనగా నేను అనగా G ఆంజనేయులు చెన్నయ్య LT లైన్ ట్రాన్స్ ఫార్మర్ నుండి స్తంభము మీదగా మొత్తం లూజు లైన్ ఉంది కావున మా యందు దయ ఉంచి చూడగలరు అని మా యొక్క మనవి</p> | <p>మీ సమస్య ను దగ్గర్లో ఉన్న సబ్ డివిజన్ ఆఫీస్ లెదా సి .ఎస్ .సి లో ఫిర్యాదు చెయ్యగలరు</p> |

**83. Vemula Kurumayya, Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215**

|  | Summary of Objections / Suggestions  | Response of the Licensee   |
|--|--|--|
|  | <p>తమరి తో చేయు మన్నవి ఏమనగా మేము అనగా వేముల కురువయ్యా<br/> NR514223419982          NR514223419989          గుంటి          కృష్ణమ్మ<br/> NR514223419996          వేముల          శాంతయ్య          NR514223420026          ఇట్లు<br/> నాలుగు డి డి లు కట్టినాము ఇట్టి డి డి లకు ఇస్టిమోషన్ త్వరగా వేసి ఈ DTR<br/> పని పూర్తి చేయగలరాన్ని          ఆసిస్తున్న</p> | <p>ఈ సర్వీసుల కోసం ఎస్టీ మేషన్ ( ఏ - 0573 - 35 - 01<br/> - 13 - 02 - 185 ) తయారు చేయడం జరిగింది<br/> త్వరితగతిన మంజూరు చేయించి (ట్రాన్స్‌ఫార్మర్ మరియు<br/> మెటీరియల్ తెప్పించి 45రోజుల్లో పని పూర్తి చేయగలము.</p> |

**84. Bekkam Kurumayya , S/o: Chinna Krishnaiah, 9-94B, Nandi Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215**

|  | Summary of Objections / Suggestions  | Response of the Licensee  |
|--|--|---|
|  | <p>గౌరవనీయులైన ఎలక్ట్రిసిటీ వారికి తెలియచేయడం ఏమనగా మా బోర్ బావికి వచ్చే ట్రాన్స్ ఫార్మర్ సరఫరా చేయబడే 11 kv స్తంభం ఒరిగి ఉండటం జరిగింది దాని వలన వైర్ వాలడం జరిగింది కావున దానిని పరిష్కరించగలరని ప్రార్థన.</p> | <p>మీ సమస్య ను దగ్గర్లో ఉన్న సబ్ డివిజన్ ఆఫీస్ లెదా సి .ఎస్ .సి లో ఫిర్యాదు చెయ్యగలరు</p> |

**85. Vadde Bala Kistaiah, S/o: V Maasaiah, Vattam (Vill), Bijanapally (M) Nagar Kurnool 509 209**

|  | <b>Summary of Objections / Suggestions</b>  | <b>Response of the Licensee</b>  |
|--|---|--|
|  | <p>వడ్డే బాలకిష్టయ్య S/o వడ్డే మాసయ్య వట్టెం గ్రామము బిజ్జుపల్లి మండలం<br/>మా ఇంటి దగ్గర ఉన్న కరెంటు మీటర్ కాలిపోయినది కొత్త మీటర్ అమర్చడం<br/>కోసం 2 వేల రూపాయలు డిమాండ్ చేస్తున్నారు.</p> | <p>కొత్త మీటర్ రూ లు dd రూపంలో కస్టమర్ సర్వీస్<br/>సెంటర్ ఇస్తే కొత్త మీటర్ బిగించడం జరుగుతుంది ఇదే<br/>విషయం వినియోగదారునికి తెలిపినాము 2 వేల<br/>రూపాయల గురించి సంబంధించిన విషయం సిబ్బందిని<br/>విచారించగా మేము ఎవ్వరిని డబ్బులు అడగలేదని<br/>చెప్పారు</p> |



**86. Kommula Shiva Ramulu, Vатtem (Vill), Bijanapally (M) Nagar Kurnool 509 203**

|  | Summary of Objections / Suggestions   | Response of the Licensee  |
|--|---|---|
|  | <p>కొమ్ముల ఓక్కమ్మW/o కొమ్ముల శివరాములు వట్టెం గ్రామము బిజ్జాపల్లి మండలం మా పొలాల్లోకి వచ్చి కరెంట్ లైన్ గత 55 సంవత్సరాల క్రితం నాటిది అప్పుడు చేసిన లైన్ కి టెలిఫోన్ వైర్లని వాడటం వలన అది వోల్టాజిని తట్టుకోలేక తెగి పోతున్నాయి స్తంభాలు కూడా శిధి లావస్తలో ఉన్నాయి స్తంభాలను మర్చి కొత్త లైన్ వేయవలసిందిగా కోరుచున్నాము మా యొక్క DD 112200152 నంబరు.</p> | <p>మీ సమస్య ను దగ్గర్లో ఉన్న సబ్ డివిజన్ లెదా సెక్షన్ ఆఫీస్ లెదా సి .ఎస్ .సి (వినియోగదారుల సేవ కేంద్రం లో) ఫిర్యాదు చెయ్యగలరు</p> |

**87. k shiva ramulu, Vattem (Vill), Bijanapally (M) Nagar Kurnool 509 203**

|  | <b>Summary of Objections / Suggestions</b>  | <b>Response of the Licensee</b>  |
|--|---|--|
|  | <p>కొమ్మల శివరాములు S/o కొమ్మల నారాయణ గ్రామము బిజినాపల్లి<br/>మండలం నాగర్ కర్నూల్ జిల్లా మాకు ట్రాన్స్ ఫార్మర్ చాల దూరంగా ఉంది దాని<br/>వాళ్ళ కరెంటు సమస్య ఎక్కువగా ఉంది కాబట్టి మాకు ఒక single phase బుడ్డే<br/>అమర్చగలరని కోరుతున్నాము sy . No 112200784 , sy . No<br/>112201035 నెంబర్ గల D . D లు గలవు.</p> | <p>అదనపు ట్రాన్స్ ఫార్మర్ కొరకు ఎస్టీ మేషన్ తయారు చేసి<br/>మంజూరు చేయించి ట్రాన్స్ ఫార్మర్ మరియు మెటీరియల్<br/>తెప్పించి 30 రోజుల లో పని పూర్తి చేయడం జరుగుతుంది</p> |

**88. B Anjaneyulu, Balaji palli, Thimmajipeta**

|  | <b>Summary of Objections / Suggestions</b>  | <b>Response of the Licensee</b>  |
|--|---|--|
|  | నేను తమరి తో చేయి మనవి ఏమనగా బాలాజీపల్లి శివారులో ట్రాన్స్ పారం ఇచ్చి మిగతా మెటీరియల్ ఇవ్వలేదు. | వినియోగదారుని పొలం పరిశీలించడం జరిగింది మిగిలిన పోల్స్ మరియు కేబుల్ వైర్ ఇచ్చి 10 రోజుల లోపల పని పూర్తి చేయడం జరుగుతుంది |

**89. Gandla Shantaiah, S/o: Keshanna, 4-51, Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215**

|  | <b>Summary of Objections / Suggestions</b>   | <b>Response of the Licensee</b>   |
|--|--|---|
|  | <p>అయ్యా తమారితో చేయు మనవి ఏమనగా నేను అనగా గండ్లే శాంతయ్య S/o ఇంటి కరెంటు బిల్లు చాల ఎక్కువగా రావడం జరుగుతుంది మాకు చాల ఇబ్బందిగా ఉంది మాకు గతం లో 250 - 300 వస్తుంది ఇప్పుడు ప్రస్తుతం 500 పైన రావడం జరుగుతుంది కావున మా యందు దయ ఉంది మా యొక్క problem చూడగలరు అని మా యొక్క మనవి.</p> | <p>మీ సమస్య ను దగ్గర్లో ఉన్న సబ్ డివిజన్ లెదా సెక్షన్ ఆఫీస్ లెదా సి .ఎస్ .సి (వినియోగదారుల సేవ కేంద్రం లో) ఫిర్యాదు చెయ్యగలరు</p> |

90) N. Mashanna , S/O Chinna Narsimha , Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215 Cell: 9542574169

| Sl.No. | Objections / Suggestions   | Responses   |
|--------|--|---|
| 1      | <p>తమారితో చేయమనండి ఏమనగా నేను అనగా నందిపేట మశన్న S/o<br/> చిన్న నర్సింహ తమలు ( ట్రాన్స్ ఫార్మర్ ) వచ్చినవి కానీ వైర్లు ఇవ్వ లేదు<br/> DD నెం 2017 తాసు పరము దువె కోలి పోయిదు m టీశన్న భూమిలో ఉన్న<br/> తాసు పరము దగ్గర దువె పెద్ద లన్ తమరు ఒకటి ఇవ్వగలరు.</p> | <p>మీ సమస్య ను దగ్గర్లో ఉన్న సబ్ డివిజన్ లెదా సెక్షన్<br/> ఆఫీస్ లెదా సి .ఎస్ .సి (వినియోగదారుల సేవ కేంద్రం లో)<br/> ఫిర్యాదు చెయ్యగలరు</p> |

91) Katshari Anjaneyulu , S/O Chinna Ooshanna, H.No. 3-73, Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215 Cell

No. 9493081809, 9705342484

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>తమారితో చేయు మన్నవి ఏమనగా నేను అనగా కట్లమురి ఆంజనేయులు చిన్న ఉచ్చన్న నాది వద్దే మాన్ గ్రామము మా యొక్క పొలం దగ్గర LT మరియు HT లైన్ చాలా క్రిందికి ఉందాము వల్ల వారి కొత్త మేషన్ కు చాలా ఇబంది ఉంది దాని వల్ల ఏమైనా ప్రాణహాన్నికలిగే అవకాశం ఉంది కావున మా యందు దయదలచి మా పొలంలు స్తంబాలు నటించగలరు.</p> | <p>లైన్లు చాల కలం క్రితం వేయబడ్డాయి 5 మధ్యస్థ స్తంభాలు ఏర్పాటు చేయవలెను ప్రస్తుతం వారి చేలు ఉండడం వల్ల పనిచేయడం వీలు కాదు వారి చేలు కోత పూర్తి అయినా తరువాత స్తంభాలు ఏర్పాటు చేయడం జరుగుతుంది</p> |

92) Sangashetty Chinna Narayan, S/O Buchanna , Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215 Cell:  
9553345911

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>సంగిశెట్టి చిన్న నారాయణ బుచ్చన్న వడ్డేమాన్ బిజ్జాపల్లి మండలం<br/>మా యొక్క పొలాల్లో LT పోలు దాదాపు 20 సమత్సరల క్రితం వాటినవి ఇది<br/>మొత్తం సిమెంట్ రాలి సికులు వెలినవి అవి చాలా చిన్నగా వున్నవి మిషన్<br/>ట్రాక్టర్ కు తగులుతున్నవి వాటిని మార్చగలరు</p> | <p>ఎల్ టి పోల్ పరిశీలించడం జరిగింది ప్రస్తుతం వారి చేలు<br/>ఉన్నందున పని పూర్తి చేయడం వీలు కాదు వారి చేలు కోత<br/>అయినా తరువాత కొత్త స్తంభము ఏర్పాటు చేయడం<br/>జరుగుంది</p> |

93) Kapari Thirupataiah, S/O Karrenna , Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215 Cell: 8179971580

| Sl.No. | Objections / Suggestions   | Responses  |
|--------|--|--|
| 1      | కసరి తిరుపతయ్య S/o కరాయిన్నగ్రామం వండి వడ్డేమాన్ బిజినాపల్లి మండలం నగర్ కర్నూల్ జిల్లా మా యొక్క పొలం దగ్గర లూజు లైను వున్నది ఎం చేయగలరు. | లూజు లైన్లు సరిచెయుటకు రెండు మధ్యస్థ పోల్స్ ఇవ్వడం జరిగింది ప్రస్తుతం అక్కడ ఉన్న వార్ చేలు కోత పూర్తి అయినా తరువాత పని పూర్తి చేయడం జరుగుతుంది |



94) Ganola chennayya, S/O Chinna Venkanna , Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215 Cell: 9505312558

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>తమారితో చేయమనవి ఏమనగా నేను గండ్ల చిన్నయ్య చిన్న వెంకన్న లూజు లైన్ transparam నుండి కట్టెల మీదగా అనుకుపోవడం జరిగింది కావున మనుషులకు పశువులకు తగలడం జరుగుతుంది కావున మా మీద దయ ఉంచి మాకు స్తంభాలు ఇవ్వగలరు అని మా యొక్క మనవి</p> <p>consumer name :- చిన్న వెంకన్న</p> <p>సర్వీస్ నెంబర్ :- 1113 00 596</p> <p>ERO :- 032 నాగర్కర్నూల్</p> | <p>ఇంటి సర్వే no.1113 00 596 , 31.03.1995 లో రిలీజ్ చేయబడింది. అప్పట్లో పోరు వైరు ఇవ్వడం జరిగింది. వినియోగదారుడు పాత బోరు ఎండిపోవడం వల్ల వేరే చోట కొత్త బోరు వేసి ట్రాన్స్ఫార్మర్ కు దగ్గరగా ఉన్న పాలు లైను నుండి కొత్త లైన్ కట్టెల మీద లైను తీసుకోవడం జరిగింది</p> |

95) A Giri Babu S/o: Krishnayya, Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215 Mobile No.9441276802

| Sl.No. | Objections / Suggestions  | Responses  |
|--------|---|--|
| 1      | <p>అయ్యా తమారితో చేయు మనవి ఏమనగా నేను అనగా ఆకుల గిరిబాబు S / o కృష్ణయ్య LT లైన్ కొరకు 4 స్తంభాలు కావాలను ట్రాన్స్ ఫార్మర్ నుండి కట్టెల మీదుగా తీసుకుపోవండం జరిగింది చాల ఇబ్బంది ఉందిగా మనుషులకు పశువులకు ఇబ్బంది ఉంది కావున మా యందు దయ ఉంచి మాకు స్తంభాలు ఇప్పించగలరు అని మనవి.</p> | <p>మీ సమస్య ను దగ్గర్లో ఉన్న సబ్ డివిజన్ ఆఫీస్ లోదా సీ .ఎస్ .సి లో ఫిర్యాదు చెయ్యగలరు.</p> |

96) N ravinder Reddy, S/O Kista Reddy , Moinabad Rangareddy Cell : 8185848116.

| Sl.No. | Objections / Suggestions  | Responses  |
|--------|---|--|
| 1      | <p>అయ్యా నాయొక్క ఇంటి పైన డర్ల లైన్ వైర్లు ఉన్నది నేను ఇల్లు కట్టు కోవడానికి ఇబ్బందిగా ఉన్నది నా యొక్క కరెంటు మీటర్ నెంబర్ 1023097 నా యొక్క ఆధార్ నెంబర్ 677938713676 గలదు అయ్యా దయ చేసి నేను ఇచ్చిన ఫిర్యాదును గమనించి నాకు సరి అయినా సహాయము చేయగలరని నా యొక్క ప్రార్థన నా యొక్క ఇంటి పై నుండి కరెంటు వైర్లు తప్పకుండా తీసివేయగలరని నా యొక్క ప్రార్థన.</p> | <p>ఇప్పటికే ఉన్న ఎల్ టి లైన్ చాల కాలం క్రితం నిర్మించబడింది, అయితే వినియోగదారుడు తన ఇంటిని అప్పటికే ఉన్న లైన్ క్రింద నిర్మించుకున్నాడు. ముందుగానే పిప్టింగ్ ఛార్జీలు చెల్లించినచో లైన్ తీసివేయబడును.</p> |

97) Kavali Ramesh, S/O Mallesh , Thallapally, Shabad Ranga Reddy Cell: 9908263032

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>నేను అనగా కావలి రమేష్ S/o మల్లేష్ గ్రా తాళ్లపల్లి సర్వే నెంబర్ 318 గ బోర్ ఉన్న స్తంభాలకు వైర్లు వదులుగా ఉన్నందున దానికి సంబంధించిన స్తంభాలు వేయగలరని అలాగే వాటిని సరిచేయగలరు మనవి.</p> | <p>వారం రోజులలో 4 నం. LT ఇంటర్మీడియట్ స్తంభాలను నెలకొల్పుతూ పని అమలు చేయబడుతుంది.</p> |

98) Kommula Shiva Ramulu S/o: Kommula Srinivasulu, Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 203 Mobile

No.9182865890

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>కొమ్ముల శివ S/o కొమ్ముల శ్రీనివాసులు విట్టేము గ్రామం బిజినాపల్లి మం<br/>మా యొక్క పొలంలో 3 phase వైర్లు చాల క్రిందికి వ్రేలాడి వ్యవసాయ<br/>కార్యకలాపాలకు ఆటంకం కల్గిస్తున్నవి కరెంటు పోల్ విరిగిపోయినది అందువల్ల<br/>పొలాల్లో పనులు చేయడానికి వ్యవసాయ కూలీలు రావడంలేదు అందువల్ల మీరు<br/>ద్వారాగా చర్యలు తీసుకోగలరని మనవి.</p> <p>Note :- మా యొక్క transparm on / off లేదు కావున మాకు<br/>ఇప్పించగలరు అని మా యొక్క మనవి Note :- వాడైమాన్ శివారు</p> | <p>మీ సమస్య ను దగ్గర్లో ఉన్న సబ్ డివిజన్ ఆఫీస్ లెదా సి<br/>.ఎస్ .సి (వినియోగదారుల సేవ కేంద్రం) లో ఫిర్యాదు<br/>చెయ్యగలరు.</p> |

99) Potala Ammer S/o Potala Naryana, Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215 Mobile No.903245558

| Sl.No. | Objections / Suggestions   | Responses   |
|--------|--|---|
| 1      | <p>తమరి తో చేయమనవి ఏమనగా నేను అనగా పోటల అమీర్ నారాయణ్</p> <p>LT లైన్ కొరకు 5 స్తంభాలు కావాలను transparam నుండి కట్టెల మీదుగా</p> <p>తీసుకపోవడం జరిగింది మనుషులకు పశువుల చాలా ఇబ్బంది ఉంది మా</p> <p>మీద దయ ఉంచి స్తంభాలు మీదగా LT లైన్ గుంజగలరు అని మా యొక్క</p> <p>మనవి</p> <p>consumer name :- పోటల నారాయణ</p> <p>సర్వీస్ నెంబర్ :- 537</p> <p>ERO :- నాగర్కర్నూల్</p> | <p>మీ సమస్య ను దగ్గర్లో ఉన్న సబ్ డివిజన్ లెదా సెక్షన్</p> <p>ఆఫీస్ లెదా సి .ఎస్ .సి (వినియోగదారుల సేవ కేంద్రం లో)</p> <p>ఫిర్యాదు చెయ్యగలరు</p> |

100) S Lakshmaiah, S/o Kurumaiah, 10-80,Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215 Mobile No.7799009566

| Sl.No. | Objections / Suggestions   | Responses  |
|--------|--|--|
| 1      | తమారితో చేయుమనవి ఏమనగా నేను అనగా లక్మయ్య చెన్నయ్య LT లైన్ transparam నుండి స్తంభము మీదగా మొత్తం లూజు లైన్ ఉంది మనుషులకు తగలడం జరుగుతుంది . | మీ సమస్య ను దగ్గర్లో ఉన్న సబ్ డివిజన్ లెదా సెక్షన్ ఆఫీస్ లెదా సి .ఎస్ .సి (వినియోగదారుల సేవ కేంద్రం లో) ఫిర్యాదు చెయ్యగలరు |

101) [Kadaari Venkataiah](#) S/o: Saianna, Nandi Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215, Mobile No.9441113550

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>తమరితో చేయు మనవి ఏమనగా నేను కడారి వెంకటయ్య s / o సాయన్న మాపాలలో విద్యుత్ సరఫరా అయ్యే వైర్లు కనెక్షన్లు సరిగ్గా పనిచేయడంలేదు వైర్లకి సపోర్టుగా ఉండే పోల్ లు పాదయ్యి కట్టెల సహాయంతో గడపవలసి వస్తుంది AB స్విచ్ కూడా కావాల్సి ఉంది కావున మాయండు దయ ఉంచి కనీస వసతులు కల్పించి మా ఇబ్బందులను తీర్చగలరని మా యొక్క విన్నపం.</p> | <p>మీ సమస్య ను దగ్గర్లో ఉన్న సబ్ డివిజన్ లెదా సెక్షన్ ఆఫీస్ లెదా సి .ఎస్ .సి (వినియోగదారుల సేవ కేంద్రం లో) ఫిర్యాదు చెయ్యగలరు</p> |



102) [Gunti pedda Narayan\(G Ramulu\)](#), Hno. 10-87, Vaddrman (V),Bijanpally(M), Nagarkurnool(D)- Pin Code 509215, Ph:-  
9391873101

| Sl.No. | Objections / Suggestions  | Responses  |
|--------|---|--|
| 1      | <p>అయ్యా చేయు మనవి ఏమనగా నేను అనగా గుంటి పెద్ద నారాయణ S/o<br/>           రాయన్న మా యొక్క 10-87 మా యొక్క ఇంటి కరెంటు బిల్లు చాల<br/>           ఎక్కువగా రావడం జరుగుతుంది మాకు చాల ఇబ్బందికారముగా ఉంది మాకు<br/>           monthly 1000 rupees పైన రావడము జరుగుతుంది మాకు గత<br/>           సంవత్సరం కింది 166 rs రావడము జరిగింది so మాకు చాల ఇబ్బందిగా<br/>           ఉంది మా యొక్క problem చూడగలరు అని మా యొక్క మనవి.</p> | <p>SC NO కి వ్యతిరేకంగా శ్రీ G పెద్ద నారాయణ S/o<br/>           రాయన్నకు C.C బిల్లులు జారీ చేయబడినట్లు<br/>           తెలియజేయడం. 1113 01193 ఎటువంటి పొరపాటు<br/>           మరియు లోపం లేకుండా గౌరవనీయమైన TSERC<br/>           ఆమోదించిన టారిఫ్ ప్రకారం ఉంది. అందువల్ల, అదనపు<br/>           బిల్లు జారీ చేయబడదు.</p> |

103) [A Anjaneyulu](#), NandiVaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215, Ph:- 9490412293

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>తమరితో చేయుమనవి ఏమనగా నేను అనగా అబ్బాఅంజనేయులు పెద్దకాశన్న నందివిడ్డేమాన్ గ్రామానందు 1 వ వడ్డూ 1 - 52 ఇంటి నెంబర్ గృహాలలో కుటుంబసమేతంగా జీవితం కొనసాగించుచున్నాను మా యొక్క గృహాపి ఓకే ఫీట్ దూరంలో గృహాలకి సప్లై అయ్యే కరెంటు స్తంభం ఉంది ఆ వైర్లు మా ఇంటి యొక్క గోడను అనుకోని ఉన్నది మారాయి అదృష్టవశాత్తు ఒక సరి తృటిలో ప్రమాదం తప్పింది ఆ స్తంభం వలన మాకు ప్రాణహాని ఉన్నది కావున మాయందు దయ ఉంచి ఈ సమస్య ని పరిష్కరించగలరని మా యొక్క మనవి.</p> | <p>వినియోగదారుని పొలం పరిశీలించడం జరిగింది మిగిలిన పోల్స్ మరియు కేబుల్ వైర్ ఇచ్చి 10 రోజుల లోపల పని పూర్తి చేయడం జరుగుతుంది</p> |

104) [P Kumar](#), Shabad (V), Shabad (M) R.R Dist- 509217, Ph:- 9640265189

| Sl.No. | Objections / Suggestions  | Responses  |
|--------|---|--|
| 1      | <p>నేను అనగా పసుల కుమార్ S/o మల్లేష్ గ్రా తాళ్లపల్లి సర్వే నెంబర్ 323 గల బోరుకు వున్న స్తంభాలకు వైర్లు వాధాలుగా ఉన్నందున దానికి సంబంధించిన స్తంభాలు వేయగలరని అలాగే వాటిని సరిచేయగలరని మనవి.</p> | <p>పనులు చాలా కాలం క్రితం చేయబడ్డాయి. ఇప్పటికే ఉన్న వ్యవసాయ LT లైన్ పోల్ లు దూరంగా ఉన్నాయి. 8 స్తంభాలను నెలకొల్పుతూ వారంలోగా పని పూర్తి చేయబడుతుంది.</p> |

105) [K Ravinder](#), Thallapally (V), Shabad(M), RR-Dist-509217, PH:- 9885645355

| Sl.No. | Objections / Suggestions   | Responses   |
|--------|--|---|
| 1      | <p>నేను కుతురు రవీందర్ మల్లయ్య నా యొక్క ప్లాటు నాగర్ గూడలోని సర్వే నెంబర్ 154 లో ప్లాటు నెంబర్ 10 నా యొక్క ప్లాటు పైనుండి 33KV విద్యుత్ లైను 2 నెలల క్రితం కొత్తగా వేయడం జరిగింది ఈ విషయమై AE కి ADE కి పలు మార్లు అభ్యంతరం తెలిపి విన్నమించుకున్నా గాని పట్టించుకోకుండా విద్యుత్ లైను వేయడం జారీడింగు దీనివలన మేము కష్టపడినా డబ్బులు ప్లాటు కొని ఇల్లు నిర్మించు కొనే సమయంలో తీవ్ర ఆటంకం ఏర్పడింది కాబట్టి అక్కడి నుంచి 33kv విద్యుత్ లైనును మర్చి మాకు న్యాయం చేయగలరని ప్రార్థన.</p> | <p>ఇప్పటికే ఉన్న 33KV లైన్ నాగర్ గూడ (గ్రా) వద్ద ఉన్న ప్లాట్ ల మీదుగా వెళుతోంది, అదే DCW కింద మంజూరు చేయబడింది మరియు నవంబర్-21 నెలలో పని జరిగింది మరియు అదే లేఅవుట్ లోని వీధితో పాటు 33KV లైన్ ను తిరిగి రీ-రూట్ చేసింది. పనులు చేపట్టే సమయంలో స్థానికుల నుంచి ఎలాంటి అభ్యంతరాలు లేవు. ఇప్పుడు కొత్తగా రీ-రూట్ చేసిన తర్వాత లైన్ ప్లాట్ల మీదుగా వెళ్లడం లేదు.</p> |

106) [Nakka Ramulu](#), Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215, Ph:- 9573440772

| Sl.No. | Objections / Suggestions  | Responses                                    |
|--------|---|--|
| 1      | <p>తమరి తో చేయుమనవి ఏమనగా నేను అనగా నక్క రాములు పర్వతాలు LT లైన్ కొరకు 5 స్తంభాలు కావాలను transparam నుండి కట్టిల మీదుగా తీసుకుపోవడం జరిగింది మనుషులకు పశువులకు తగలడం ము జరుగుతుంది మొత్తం లూజు లైను ట్రాక్టర్ వారి టిప్పర్ తగలడము జరుగుతుంది కావున మా యందు దయ ఉంచి మాకు స్తంభాలు ఇవ్వగలరు అని మనవి</p> <p>DDNO 403</p> | <p>లూజ్ లైన్లు 10 రోజుల్లో సరిచేయబడతాయి.</p> |

107) [Bathku Ramulu](#), S/o Late Anjaiah, Amdapur Village, Moinabad (Mandal), Ranga Reddy (dist), Mob No 95052 96394

|  | Objections / Suggestions  | Responses   |
|--|---|---|
|  | <p>నేను బత్తురాములు S/o late అంజయ్య నివాసము ఆమ్లాపూర్ గ్రామము ,మొయినాబాద్ మండలం రంగ రెడ్డి జిల్లా నేను ఇల్లు కట్టుకుని 20 సంవత్సరాలు కావస్తున్నది ఈ యొక్క ఇంటికి మీటర్ ఉన్నది ప్రతి నెల బిల్లు కూడా చెల్లిస్తున్నాను కట్టెల మీద వైర్లు వేసుకొని నడిపించుకోవడం జరుగుతున్నది నాకు చల్ ఆఇబ్బందిగా ఉన్నది అందుచేత నా ఇంటి వరకు రెండు స్తంభాలు మరియు వైర్లు వేయమని సంబంధిత విద్యుత్ అధికారులకు చాల సార్లు విన్న పించుకున్నాను నాకు చాల ఇబ్బందిగా ఉన్నందున నా పై దయదలచి నాకు ఇంటికి రెండు స్తంభాలు మరియు వైర్లు వేయించగలరని తమారితో మనవి చేసుకుంటున్నాను సర్వీస్ నెంబర్ 810200437</p> | <p>శ్రీ.గోపి కృష్ణ, సర్పంచ్ గ్రామపంచాయతీ అమ్లాపూర్ తో కలిసి స్థలాన్ని పరిశీలించగా, లాంగ్ సర్వీస్ వైర్ తో సర్వీస్ కనెక్షన్ పొందినట్లు గుర్తించారు. ఇదే విధమైన పనుల కోసం గ్రామపంచాయతీ ద్వారా స్తంభాలు ఏర్పాటు చేస్తున్న సమయంలో 2 స్తంభాలు ఏర్పాటు చేశారు. ఇదే విషయాన్ని దరఖాస్తుదారునికి తెలియజేశారు.</p> |

108) [kampil Thimmappa](#), 1-99, MaddelBeed (V), Damaragidda (M), Narayanpeta- Ph:- 8688842567

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>నారాయణ పెట్ట జుల్లా ధమర్ గిద్ద మండలం మద్దెల్ బ్రిడ్జ్ గ్రామ కంపల్లి తిమ్మప్ప బాలప్ప అను నేను గత 2013 సం లో డి డి కట్టడం జరిగింది అప్పటి నుంచి ఇప్పటి వరకు మూడు స్తంభాల వరకు పొడువునా సర్వీస్ వైర్ ని కట్టెల సహాయంతో వైర్ ని తెచ్చి మోటార్ ని నడుపుకోవడం జరుగుతుంది కావున నాకు త్రీ స్తంభాలు ఇచ్చి నా యొక్క సమస్యని పరిష్కరించగలరని నా యొక్క మనవి .</p> | <p>ఏఈ/ఆపరేషన్/దామరగిద్ద సర్వే జరుపగ అతని పట్టా పొలములో యెటువంటి బోరుబావి లేదు కానీ అతని పొలం దగ్గరలో ఉన్న వాగు నుండి నీరు తొడడానికి విద్యుత్ మోటార్ వాడుచున్నాడు.</p> |

109) [J Hanumanthu](#), Bodhan (V), Pochampalli (M), Yadadri(Dist),

Cell: 984837004

| Sl.No. | Objections / Suggestions  | Responses  |
|--------|---|--|
| 1      | <p>బోధన్ పోచంపల్లి యాదాద్రి భువనగిరి జిల్లా గ్రా గార్లపంట బావి వద్ద మహాత్ములు గుడి సుమారు 6 ,7 నెలల క్రితం ట్రాన్స్ ఫార్మర్ నెంబర్ 200538998 బిగించుయున్నారు దాని క్రింద 3 మోటార్స్ ఉన్నవి అందులో 3 వ మోటార్ కు 2 నుండి 3 పోల్స్ దూరం ఉన్నందున మోటార్ నడిపించకుండా యున్నది దయచేసి 3 పోల్స్ వేయించగలరని నా యొక్క మనవి.</p> | <p>ఇప్పటికి అంచనా ప్రకారముగా వినియోగదారునికి కావలసిన విద్యుత్ సామగ్రితో పనిని పూర్తి చేయి సర్వీసు నుంబరులు ఇవ్వడము జరిగింది వినియోగదారుడు అదనంగా నాలుగు స్తంబాలు 5540107559, 5540107660 &amp; 5540107761 ఇవ్వమని కోరడం జరిగింది దీని నిమిత్తం తేదీ 03 .02 .2022 నాడు డివిజనల్ ఇంజనీరు చోటుప్పుల్ గారు వినియోగదారుని సర్వీసుని తనిఖీ చేశారు అదనపు స్తంభాల కొరకు అంచనా రూపొందించి వినియోగదారునికి తెలియపరచగలము</p> |



110) [Gorrey Subhash](#) S/oChinnaiah,H.NO:2-14,Maddelbheed(Village),Damera Gidda (Mandal),Narayanpet, Mobile7569600400

| Sl.No. | Objections / Suggestions   | Responses   |
|--------|--|---|
| 1      | <p>నాపేరు గొర్రె సుభాష్ S/o చిన్నయ్య గ్రామము మద్దెల బేదు మండలం దామర్ గిద్ద జిల్లా నారాయణపేట. నేను 2018 లో DD కట్టడం జరిగింది నాకు స్తంబాలు తక్కువగా ఇవ్వడం వల్ల కర్రలపై నా యొక్క బోరుబావి దగ్గరకు తీసుకుపోవడం కనెక్షన్ ఇవ్వడం జరిగింది నాకు రెండు స్తంబాలు వేస్తే ప్రమాదం జరగకుండా ఉంటుంది నాకు న్యాయం చేయగలరని అలాగే ట్రాన్స్ పారం కాళిపోయిన ప్రతిసారి మేము ట్రాన్స్ పారం క్రిందా ఉన్న రైతులంటూ డబ్బులు వేసుకొని ట్రాన్స్ పోర్ట్ మరియు T నోటి అని తీసుకుంటున్నారు అలాగే లోడింగ్ ట్రాన్స్ పారం దించడానికి పైన పెట్టడానికి డబ్బులు తీసుకుంటున్నారు ట్రాక్టర్ కిరాయి 2000 లైన్ మెన్ 50 లేబర్ కి 1500 మొత్తం 4000 /-.</p> | <p>2 Nos. LT విద్యుత్ స్తంబాలు యేర్పాటు చేసి AB కేబల్ లాగడం జరిగింది.</p> |

111) [Gorre Anuradha](#), W/o Narsappa ,H.NO. 3-76, Maddelbheed (Village), Damera Gidda (Mandal), Narayanpet, MobNo 9177978780

| Sl.No. | Objections / Suggestions   | Responses  |
|--------|--|--|
| 1      | <p>తమారితో చేయు మనవి ఏమనగా నేను అనగా గొర్రె అనురాధ W/o నర్సప్ప గ్రామము మిడిల్ బీడు మండలం దామర్ గిద్ద జిల్లా నారాయణపేట నా యొక్క వ్యవసాయ పొలము యొక్క సర్వే నెంబర్ 300 302 303 సంబంధించిన పొలము నందు విద్యుత్ లైన్ కరెల పై నా బోరుబావి దగ్గరకు కనెక్షన్ తీసుకున్న కరెలపై ఉన్నందున గాలికి వానకు కర్రలపై నుండి క్రింది పది ప్రమాదం జరిగే అవకాశం ఉన్నది దయ చేసి స్తంబాలు వేసి నాకు న్యాయం చెయగలరని నా యొక్క మనవి అలాగే DD కట్టడం జరిగింది.</p> | <p>కట్టే ధుంగాలను తీసి 8.0 Mtrs విద్యుత్ స్తంబాలు యేర్పటు చేసి. AB కేబల్ లాగి సర్వీస్ కనెక్షన్ NO. K261800607 ఇవ్వడం జరిగినది.</p> |

112) [P Vital](#), Kalkode (V), Marpally (M), Vikarabad- 501106, Ph:- 8074438417

|  | Objections / Suggestions  | Responses  |
|--|---|--|
|  | <p>1)నల్లల భావి 3 తభాలు కిందికి ఉన్నవి ప్రభాకర్ భావి వరకువిద్యుత్ తీగలు వదులుగా ఉన్నాయి</p> <p>2)బోయిని అంజయ్య బిచ్చప్ప కాపురం నుండి అంజయ్య భావి 4 తంబాల కిందికి వున్న.</p> <p>3) బుండిగి యేషయ్య నుండి చెక్క బాలయ్య వరకు స్థంభం ప్రక్కకు ఒరిగినది.</p> <p>4) లక్ష్మీమిల కాలనిలో పొరగిళ్ళ ఎల్లేశా ఇంటి ముందు వంగి ఉన్నది</p> | <p>1) వినియోగదారుడి చరవాణి పరిశీలించగా, ఇప్పటికే ఉన్న వ్యవసాయ LT విద్యుత్ తీగలు వదులుగా ఉన్నాయి. 8 స్తంభాలు నెలకొల్పుతూ వారంలో పని పూర్తి అవుతుంది.</p> <p>2) వినియోగదారుడి చరవాణి ద్వారా పరిశీలించగా, ఇప్పటికే ఉన్న వ్యవసాయ విద్యుత్ తీగలు వదులుగా ఉన్నాయి.4 స్తంభాలు నెలకొల్పుతూ వారంలో పని పూర్తి అవుతుంది.</p> <p>3) వినియోగదారుడి చరవాణి ద్వారా పరిశీలించగా, ఒక్క వ్యవసాయ</p> |

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| <p>5) బస్టాండ్ ముందు దుకాణముల వెనుక స్కూల్ కాంపౌండ్ వైర్లు వంగి ఉన్నాయి</p> <p>6) రైల్వేముల అంజన చైను నుండి D అజమాత్ చేనుకు పోయే లైను వంగి ఉన్నవి</p> <p>7) ఉగ్గలి రఘుపతి రెడ్డి చేనులో వంగి ఉన్నవి</p> <p>8) పాశుల దాతయ్య ట్రాన్స్ఫర్మర్ నుండి పాశుల జనార్దన్ భూమి భావి వరకు కిందికి ఉన్నవి.</p> | <p>IT విద్యుత్ స్తంభం ప్రక్కకు ఒరిగినది.1 స్తంభం నెలకొల్పుతూ వారంలో పని పూర్తి అవుతుంది.</p> <p>4) వినియోగదారుడి చరవాణి ద్వారా పరిశీలించగా,ఒక్క వ్యవసాయ LT విద్యుత్ స్తంభం ప్రక్కకు ఒరిగినది.1 స్తంభం నెలకొల్పుతూ వారంలో పని పూర్తి అవుతుంది.</p> <p>5) 4 విద్యుత్ స్తంభాలు నెలకొల్పాలి. వారంలో పని పూర్తి అవుతుంది.</p> <p>6) వినియోగదారుడి చరవాణి పరిశీలించగా,6 విద్యుత్ స్తంభాలు ప్రక్కకు ఒరిగినవి.6 స్తంభాలు నెలకొల్పుతూ, వారంలో పని పూర్తి అవుతుంది.</p> |
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|  |  | <p>7) వినియోగదారుడి చరవాణి పరిశీలించగా, 2 విద్యుత్ స్తంభాలు ప్రక్కకు ఒరిగినవి. 2 స్తంభాలు నెలకొల్పుతూ, వారంలో పని పూర్తి అవుతుంది.</p> <p>8) వినియోగదారుడి చరవాణి ద్వారా పరిశీలించగా, ఇప్పటికే ఉన్న వ్యవసాయ LT విద్యుత్ తీగలు వదులుగా ఉన్నాయి. 7 స్తంభాలు నెలకొల్పు</p> |
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113) [P Papaiah](#), Kotlapur (V), Marpally (M), Vikarabad (D)-501202, ph:- 9963903604

| Sl.No. | Objections / Suggestions   | Responses   |
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| 1      | <p>పేరు పీర్ల పాపయ్య S/o అంతయ్య గ్రా కొత్తాపూర్ మ మర్పల్లి జిల్లా వికారాబాద్ నేను నివాసము చేయుచున్న ఇంటి పైనుండి పైభాగము నుండి సర్వీస్ వైరులు పోయినవి నేను ఇంటి పై భాగము పైకి వెళ్ళే పనికి ప్రమాదకరంగా ఉన్నది ప్రక్క ఇల్లు వారికి వేరే మార్గము కావున వాటిని వేరే స్తంభము వేసి వేరే మార్గము గుండా పంపియడని 1 ఒక స్తంభము వేయించగలరని తమారితో ప్రాధేయపడుచున్నాను స్తంభము వేయడానికి మార్గము సులభంగా యున్నది కావున స్తంభము వేయగలరని నా యొక్క మనవి</p> | <p>వినియోగదారుడి చరవాణి ద్వారా పరిశీలించగా, ఒక విద్యుత్ స్తంభాన్ని నెలకొల్పుతూ ఆ యొక్క సర్వీస్ విద్యుత్ తీగను ఆ యొక్క స్తంభానికి కనెక్షన్ ఇవ్వాలి. 1 స్తంభం నెలకొల్పుతూ వారంలో పని పూర్తి అవుతుంది.</p> |

114) [A Ananth Reddy](#), Kotmarpally (V), Marpally (M), Vikarabad- 501202, Ph:- 9381443428

| Sl.No. | Objections / Suggestions   | Responses   |
|--------|--|---|
| 1      | <p>కోట్ మర్పల్లి గ్రా కుమ్మరి రాములు తండ్రి అంతయ్య గారి పొలము నుండి<br/>బెజిగారి అనంతరెడ్డి తండ్రి నారాయణరెడ్డి బోరు మెడకు లూజ్ వైర్ స్తంభం<br/>సపోట వైర్ జెమ్ పర్ రిపేర్ చేయగలరని మనవి.</p> | <p>వినియోగదారుడి చరవాణి పరిశీలించగా, ఇప్పటికే ఉన్న<br/>వ్యవసాయ LT విద్యుత్ తీగలు వదులుగా ఉన్నాయి.5<br/>స్తంభాలు నెలకొల్పుతూ వారంలో పని పూర్తి అవుతుంది.</p> |

115) [P Raghava Reddy\(Ananth Reddy\)](#), Damasthapuram (V),Marpally (M), Vikarabad- 501202, Ph:-

| Sl.No. | Objections / Suggestions  | Responses  |
|--------|---|--|
| 1      | <p>దామస్తపురం గ్రామా పరిధిలో యుండబడిన సర్వే నెంబర్ 109 గల భూమి యందు భావికలదు అట్టి బావికి 2 స్తంభాలు మరియు వైరు కావలెను రైతు పేరు రఘుపతిరెడ్డి తండ్రి హన్మంతరెడ్డి గారికి కరెంటు గతంలోనే మంజూరు అయినది.</p> | <p>వినియోగదారుడి చరవాణి ద్వారా పరిశీలించగా,2 విద్యుత్ స్తంభాలు నెలకొల్పుతూ విద్యుత్ తీగలు అమర్చాలి.2స్తంభాలు నెలకొల్పుతూ వారంలో పని పూర్తి అవుతుంది.</p> |



116) [G Namdaiah](#), Kotlapur(V), Marpally (M), Vikarabad- 501202, Ph:- 9963351985

| Sl.No. | Objections / Suggestions   | Responses   |
|--------|--|---|
| 1      | <p>1 ) కరెంటు తంబము ఇవ్వగలరు</p> <p>2 ) వైర్లు లూసు కలవు బిగించవలయును</p> <p>3 ) తంబము పాటించగలరు</p> <p>4 ) F 245002982 బోర్ కనెక్ష న నెంబర్</p> <p>5 ) ట్రాన్స్ ఫారం నుండి మా బోరు వరకు లూజుగా వైర్లు కలవు S .N - 172</p> <p>6 ) పై వాటినుంచి సమస్య తీర్చగలరు.</p> | <p>వినియోగదారుడి చరవాణి ద్వారా పరిశీలించగా, ఇప్పటికే ఉన్న వ్యవసాయ LT విద్యుత్ తీగలు వదులుగా ఉన్నాయి.2 స్తంభాలు నెలకొల్పుతూ 9 స్తంభాల మీదుగా విద్యుత్ తీగలను సరి చేయాలి. వారంలో పని పూర్తి అవుతుంది.</p> |

117) [K Kumar, Kuthuru Kumar, Thallapally \(V\)](#), Shabad (M), R.R (Dist), Ph: 8712161539.

| Sl.No. | Objections / Suggestions  | Responses  |
|--------|---|--|
| 1      | <p>నా యొక్క సమస్య గత 3 సం !! గడిచి నటువంటి సమస్య DD లు చెల్లించి 3 సం !! అవుతుంది గత సంవత్సరంలో ట్రాన్స్ ఫార్మర్ ఏర్పాటు చేయడం జరీదింది దానికి సంబంధించిన పనులు సక్రమంగా చేయకుండా వదిలి వేయటం జరీదింది థానికి సంబంధించి LT లైన్ కనెక్షన్ ఇవ్వకుండా వదిలి వేయడం జరీదింది అది ప్రస్తుతం కరెక్ట్ ఉంది థానికి రెండు పోల్స్ వేసి లైన్ ఇస్తే మోటార్ నడిచే అవకాశం ఉంది కాబటి దానికి సంబంధించిన పనిని పూర్తి చేయించగలు నయొక్క మనవి.</p> | <p>డిటిఆర్ మరియు ఎల్టి లైన్లను పరిశీలించారు, ఫిర్యాదు 7 రోజుల్లో పరిష్కరించబడుతుంది.</p> |

118) [Gadipe Narsing Rao](#), Husnabad (M)- Siddipet Dist-505467, Ph:- 9390114200

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>ఇండ్ల మధ్యలో ఉన్న ట్రాన్స్ ఫార్మర్ తొలగించగలరని మనవి మనుషుల ప్రాణాలకు హానికరంగా ఉన్నది కావున మా యందు దయతలచి హస్పాబాద్ బాస్ డిపో వెనుక కాలానికి ట్రాన్స్ ఫార్మర్ తొలగించగలరని విజ్ఞప్తి చేస్తున్నాము.</p> | <p>దీనికై సర్వే నిర్వహింపబడినది . అంచనా తయారు చేసి 30 రోజులలో పని పూర్తి చేస్తాము .</p> |

119) [P Vital](#), Kalkodd (V), Marpally (M), Vikarabad- 501202, Ph:- 8074438417

| Sl.No. | Objections / Suggestions  | Responses  |
|--------|---|--|
| 1      | <p>1) సా స్వి త్త భూమి స్వరకచుమ్మ ( 65 ) లో 3 ఫేస్ లైన్ కలెక్షన్ కట్ చేసియున్నారు</p> <p>2) లక్ష్మి పుర ట్రాన్స్ ఫారం ను అన్నత స్వామి వరకు లూజు వున్న</p> <p>3) ఎర్ల గల్ల రాములు ట్రాన్స్ ఫారం నుండి సుకీగ్వాటివి సరోళ్ల లైను క్రిందికి ఉన్నవి పద్మ కార పటేల్ ట్రాన్స్ ఫారం నుండి అంజాయ బోర్ వరకు లూజు ఉన్నవి</p> <p>4)దుబార్ల ట్రాస్వ పరం నుని అటూరి రామచంద్ర భావి వారకు లూజు ఉన్నవి</p> <p>5)దోబాగు ట్రాస్వ పరం నుండి పసుల్ల లక్ష్మయ్య ఎల్లపప్ప తంభలు</p> | <p>1) వినియోగదారుడి చరవాణి ద్వారా పరిశీలించగా,ఇప్పటికే ఉన్న వ్యవసాయ - విద్యుత్ తీగలు వదులుగా ఉన్నాయి.5 స్తంభాలు నెలకొల్పుతూ వారంలో పని పూర్తి అవుతుంది.</p> <p>2) వినియోగదారుడి చరవాణి ద్వారా పరిశీలించగా,ఇప్పటికే ఉన్న వ్యవసాయ LT విద్యుత్ తీగలు వదులుగా ఉన్నాయి.9 స్తంభాలు నెలకొల్పుతూ వారంలో పని పూర్తి అవుతుంది.</p> <p>3) వినియోగదారుడి చరవాణి ద్వారా పరిశీలించగా,ఇప్పటికే ఉన్న వ్యవసాయ LT విద్యుత్ తీగలు వదులుగా ఉన్నాయి.5</p> |

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|  | <p>పాతదైనది వైరు లేదు తక్షణ వేయించగలరని.</p> | <p>స్తంభాలు నెలకొల్పుతూ వారంలో పని పూర్తి అవుతుంది.</p> <p>4) వినియోగదారుడి చరవాణి ద్వారా పరిశీలించగా,ఇప్పటికే ఉన్న వ్యవసాయ LT విద్యుత్ తీగలు వదులుగా ఉన్నాయి.4</p> <p>స్తంభాలు నెలకొల్పుతూ వారంలో పని పూర్తి అవుతుంది.</p> <p>5) వినియోగదారుడి చరవాణి ద్వారా పరిశీలించగా,ఇప్పటికే ఉన్న వ్యవసాయ LT విద్యుత్ తీగలు వదులుగా ఉన్నాయి.5</p> <p>స్తంభాలు నెలకొల్పుతూ వారంలో పని పూర్తి అవుతుంది.</p> |
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120) [P Bhadrappa](#), Kothlapur(V), Marpally (M), Vikarabad-501202, Ph:- 9704231312

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>వికారాబాద్ జిల్లా మార్పల్ల మండలం కొత్తాపూర్ గ్రామం పాట్లల్లా భద్రప్ప పొలాల్లో 3 ఫేస్ లైన్లో రెండు స్తంభాలు భూమికి ఒరిగినవి వైర్లు భూమికి వేలాడుతున్నాయి ప్రస్తుతం కట్టెలు పోటీ పెట్ట వరాపిస్తున్నాము రెండు స్తంభాలు పాడయినాయి వాటి స్థానంలో కొత్త స్తంభాలు బిగించి సరిచేయగలరు.</p> | <p>వినియోగదారుడి చరవాణి ద్వారా పరిశీలించగా, ఇప్పటికే ఉన్న వ్యవసాయ LT విద్యుత్ స్తంభాలు ప్రక్కకు ఒరిగి ఉన్నాయి. 3స్తంభాలు నెలకొల్పుతూ, వారంలో పని పూర్తి అవుతుంది.</p> |

121) [S.Venkat Reddy](#), S/o Sai Reddy, Thimmayipally Village, Mussipality Kosgi Mandal, Narayanpet District, Mob No 9652338967

| Sl.No. | Objections / Suggestions   | Responses  |
|--------|--|--|
| 1      | <p>సిద్ది గారి వెంకట్ రెడ్డి సాయిరెడ్డి గ్రామము తిమ్మాయపల్లి మున్సిపాలిటీ కోస్లి అనేనెను నా చేనులో (ట్రాన్స్ ఫార్మర్ ఉంది ట్రాన్స్ ఫార్మర్ కి లేదు మరియు ఎలాంటి కంచు ఏర్పాటు లేదు కావున సార్ ఆన్ ఆఫ్ చేయించండి మరియు మా గ్రామము నుండి చెరువుకు వెళ్లె దారిలో ఉంది ట్రాన్స్ ఫార్మర్ రోడ్ మీద ఉంది బార్లు డుల్లు గోర్లు వెకలు మనుషులు వెళ్లె రోడ్ మీద ఉంది కావున ఆన్ ఆఫ్ మరియు కంచె తప్పని సరిగా వేయించండి సార్ ట్రాన్స్ ఫార్మర్ నుండి LT లైను ఒక పోల్ వైర్ లూజుగా ఉంది ట్రాన్స్ ఫార్మర్ కాలిపోయినచో T Note కు</p> | <p>ఏఈ/ఆపరేషన్/కోస్లి సర్వే జరుపగ విద్యుత్ నియంత్రక ON/OFF స్విచ్ మరియు ఓపెన్ వైరింగ్ కిట్ ఉన్నవి, AB స్విచ్ ఆపరేటింగ్ పైపు మాత్రమే లేదు. ప్రస్తుతం AB స్విచ్ ఆపరేటింగ్ పైపు మరియు స్తంబాలు మద్య ఎక్కువ నిడివి సరిచేయుటకు గుత్తేదారుకు 2 Nos. 8.0 Mtrs విద్యుత్ స్తంబాలు ఇవ్వడము జరిగినది. వారము రోజులలో పనులు పూర్తి చేయబడును.</p> |

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| <p>200 రూపాయలు ఇవ్వాలి ట్రాన్స్ ఫార్మర్ ఆఫీసుకు పోయిన తర్వాత డిప్పనికే మరియు ట్రాన్స్ ఫార్మర్ చేసినా తర్వాత ట్రాక్టర్ మెడకు ఎక్కియనికే 150 మరియు ట్రాక్టర్ కిరాయి 2000 /- రూ సార్ మారైతులకు 4000 /- - 5000 /- రూ వరకు ఖర్చు అవుతుంది సార్ ఈ ఖర్చు మాకు తగ్గేటట్లు చుడండి సార్.</p> |  |
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122) [Venkataiah Dubbani](#), Thimmayipally Village, Mussipality Kosgi Mandal, Narayanpet District, Mob No 8523867524

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>గుబ్బని వెంకటయ్య గ్రామము తిమ్మనేపల్లి మండలం మునిసిపాలిటీ కోస్లి గారిని సార్ నా యొక్క చేనులో ట్రాన్స్ ఫార్మర్ కి ఆన్ ఆఫ్ లేదు ఫిసు వీరు పోయిన చొ చాల ఇబ్బంది ఉంది కావున ఆన్ ఆఫ్ వేయించండి సార్ .</p> <p>2)సార్ ట్రాన్స్ ఫార్మర్ చుట్టూ కంచె వేయించండి సార్.</p> <p>3) ట్రాన్స్ ఫార్మర్ కాళి పోయిన చొ ట్రాక్టర్ కిరాయి మరియు ట్రాన్స్ ఫార్మర్ అఫిసుకు వేసుకొని పోవడానికి ఆఫీసులో దింపానికే మల్లి ఎక్కియనికే 1500</p> <p>/- రూ ఆఫీసు వాలు తీసుకుంటున్నారు T Note కూడా 200 /- రూ తీసుకుంటున్నారు సార్ ఈ ఖర్చులు తగ్గించండి సార్.</p> | <p>ఏఈ/ఆపరేషన్/కోస్లి సర్వే జరుపగ విద్యుత్ నియంత్రక ON/OFF స్విచ్ మరియు ఓపెన్ వైరింగ్ కిట్ లేవు, ప్రస్తుతం AB స్విచ్, ఓపెన్ వైరింగ్ కిట్, మరియు స్తంబాలు మద్య ఎక్కువ నిడివి సరిచేయుటకు గుత్తేదారుకు 3 Nos. 8.0 Mtrs విద్యుత్ స్తంబాలు ఇవ్వడము జరిగినది. వారము రోజులలో పనులు పూర్తి చేయబడును.</p> |

123) [Kadumakkalla Pedda Anjilayya](#) S/o Balaiah, Timmayee Palli, Musipalitee, Kosigi, Narayanpet Dist, Mobile 9491032043

| Sl.No. | Objections / Suggestions  | Responses  |
|--------|---|--|
| 1      | <p>కడుమకళ్ల పెద్ద అంజిలయ్య S/o బాలయ్య గ్రమ్మను తిమ్మ యి పల్లి మండలం మున్సిపాలిటీ కోస్లి గార్ని సార్ నా చేనులో ట్రాన్స్ ఫార్మేర్కు ఆన్ ఆఫ్ లేదు సార్ ఆన్ ఆఫ్ చేయించండి మరియు కంచే కూడా వేయించండి సార్ .నా చేన్ల నుండి 11kv పోయింది సార్ ఒక పాలు మొడ్డబడింది కావున ఒక పాలు కొత్తది వేయండి సార్.</p> | <p>ఏఈ/ఆపరేషన్/కోస్లి సర్వే జరుపగ విద్యుత్ నియంత్రక ON/OFF స్విచ్ మరియు ఓపెన్ వైరింగ్ కిట్ ఉన్నవి, AB స్విచ్ మూవింగ్ &amp; ఫిక్సెడ్ కాంటాక్టు పనిచేయుట లేవు. ప్రస్తుతం AB స్విచ్ మూవింగ్ &amp; ఫిక్సెడ్ కాంటాక్టులు మరియు 1 No. 8.0 Mtrs విద్యుత్ స్తంబము గుత్తేదారుకు ఇవ్వడము జరిగినది. వారము రోజులలో పనులు పూర్తి చేయబడును.</p> |

124) [Gollapalli Rami Reddy](#), Amlapur (V), Moinabad (M), Rangareddy(Dist)- 509217, Ph:- 9949265651

| Sl.No. | Objections / Suggestions   | Responses                 |
|--------|--|---------------------------|
| 1      | <p>నేను గొల్లపల్లి రాంరెడ్డి S / o late భీమ్ రెడ్డి నివాసము ఆమ్లాపూర్ గ్రామము మొయినాబాద్ మండలం రంగారెడ్డి నా యొక్క పొలము మీద నుంచి 400 kv లైన్లు ( హై టెన్షన్ వైర్లు ) పోయినాయి నా పొలములో నుంచి లారీలు మరియు ట్రాక్టర్లు పోయినాయి అందు చేత నా పొలములో గులాబీ చెట్లు అనియు కర్రబైనవి దీనికి నాకు లాసు 500000 అయిదు లక్షల పైనే నష్టము జరిగినది కానీ నాకు 120000 /- లక్ష ఇరువై వెయిలు మాత్రమే ఇచ్చినారు నాకు 5 లక్షల నుంచి 7 లక్షల వరకు నష్టము జరిగినది ఈ నష్ట పరిహారము ఇప్పించగలరని నా యొక్క మనవి పొలము సర్వే no 180.</p> | TSTRANSCO కి సంబంధించినది |

125) [Cheguri Balayya](#), Shabad (V), Shabad (M), R.R Dist- 509217, Ph:- 7842611796

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>నేను చేగురి బాలయ్య S/o పైలయ్య షాబాద్ గ్రామా నివాసి మం షాబాద్ నా యొక్క ప్రాబ్లెమ్ నా యొక్క బోరుకు సర్వీస్ నెంబర్ 5100800864 నా యొక్క సర్వీస్ నెంబర్ AGL స్తంబాలు మెటీరియల్ వైర్ ఇవ్వలేదు తాత్కాలికంగా సర్వీస్ వైర్ తో నడిపించుకుంటున్నాను బిల్లు కట్టుతున్నాను పూర్తి స్థాయి కనెక్షన్ ఇవ్వవలసింది కోరుతున్నాను దాదాపు అయిదు సంవత్సరము అవుతున్నది ఎన్ని సార్లు మొరగపెట్టుకున్నా పని చేయడం లేదు దయ చేసి నాకు న్యాయము చేయగలరని కోరుతున్నాను.</p> | <p>సర్వీస్ 29-02-1996న విడుదలైంది, ఇప్పుడు వినియోగదారు అదనపు పోల్స్ కోసం అభ్యర్థిస్తున్నారు</p> |

126) [K Balvanth Reddy](#), Nagarguda (V), Shabad (M), R.R Dist- 509217, Ph:- 9966156487

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>నేను అనగా k బల్ వంత్ రెడ్డి గ్రా నాగర్ గూడా మం షాబాద్ జి రాంగారెడ్డి గారిని మీతో మనవి చేయడమేమనగా మా కాలనీ శాంతినగర్ లో కరెంటు ప్రాబ్లం వున్నందున మాకు నాలుగు స్తంబాలు మెట్టెరియల్ తో సహా మాకు అవసరం వుండును మీ దేపాత్ మేట వారికి మని చేయుచున్నాము దయ చేసి తొంగరగా ఇవ్వగలరని మనవి చేయుచున్నాము.</p> | <p>WBS ఎలిమెంట్ నంబర్: A053865011202103 ద్వారా అంచనా మంజూరు చేయబడింది, పనిని అమలు చేస్తున్నప్పుడు సరైన మార్గం సమస్య కారణంగా స్థానిక ప్రజలు అభ్యంతరం వ్యక్తం చేస్తున్నారు.</p> |

127) [Karne Mallamma](#), Kothlapur (V), Marpally (M), Vikarabad (Dist)- 501202, Ph:- 9963631911

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>సర్వే నెంబర్ 201 గల భూమిలో బావికి కరెంటు తీసుకోవడమైనది అట్టి కరెంటు కు సంబంధించిన కరెంటు వైర్లు భూమికి తగిలినట్లు వేలాడుతున్నవి వాటిని 1 స్తంభం వేసి లేపగలరని మా యొక్క మనవి.</p> | <p>కొల్లాపూరం అను గ్రామం మర్పల్లి మండలంలో మరియు వికారాబాద్ జిల్లాలో లేదు.</p> |

128) [S Vishnu Vardhan Reddy](#), Kothlapur (V), Marpally (M), Vikarabad (Dist)- 501202, ph:- 8247576699

| Sl.No. | Objections / Suggestions  | Responses  |
|--------|---|--|
| 1      | <p>కొత్లాపూర్ గ్రామం మర్పల్లి మండలం జిల్లా వికారాబాద్ కొత్లాపూర్ గ్రామంలో పట్టా దారు సలికి తనుజ W/o ప్రదీప్ రెడ్డి వైర్లు భూమికి వేలాడుతున్నాయి వైర్లు బిగించి సప్లొర్ట్ ఒక స్తంభం వెయ్యాలి లేదా ఫీల్డ్ లో చూసి మధ్యలో ఒక స్తంభం వేయించాలి స్తంభం కు స్తంభం మధ్య దూరం ఎక్కువగా ఉంది స్తంభాలకు సప్లొర్ట్ వైరు వేయనందున స్తంభాలు భూమికి వారిగినాయి సప్లొర్ట్ వైరు వేసి వైర్లు బిగించాలని నా యొక్క మనవి.</p> | <p>వినియోగదారుడి చరవాణి పరిశీలించగా, ఇప్పటికే ఉన్న వ్యవసాయ LT విద్యుత్ తీగలు వదులుగా ఉన్నాయి.2 స్తంభాలు నెలకొల్పుతూ 2 ప్రక్కకు ఒరిగిన స్తంభాలనుసరి చేయాలి. వారంలో పని పూర్తి అవుతుంది.</p> |

129) [A Ananth Reddy](#), Kotmarpally(V), Marpally (M), Vikarabad (Dist)- 501202, Ph:- 9381443428

| Sl.No. | Objections / Suggestions  | Responses  |
|--------|---|--|
| 1      | మార్కపల్లి నుండి కోట్ మర్పల్లి మెయిన్ లైన్ వైర్ లూజు స్తంభాలు వొరిగినవి సరిచేయాలి చాలారోజుల నుండి పట్టించు కోవడం లేదు దయచేసి సరి చేయగలరని మనవి ఇట్లో గ్రామా రైతులు పొలాల్లో రైతులకు ఇబ్బందిగా మారినది | వినియోగదారుడి చరవాణి ద్వారా పరిశీలించగా, 3 విద్యుత్ స్తంభాలు ప్రక్కకు ఒరిగి ఉన్నాయి, 3 ప్రక్కకు ఒరిగిన స్తంభాలను వారంలో సరి చేయడం జరుగును. |



130) [D Krishna](#), Saireddy Guda (V), Shabad (M), R.R Dist-509217, Ph:- 9908934347

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>దోనూరి కృష్ణ s / o రామకృష్ణయ్య గ్రా సాయిరెడ్డి గూడెం మండల్ షాబాద్ జిల్లా రంగారెడ్డి నాకు గ్రా మాచన్ పల్లి మండల్ షాబాద్ రంగారెడ్డి H No 175 / 2 లో కరెంటు వైర్లు ఉంది ఒకటికిఒకటి తాకుకొని సగం కట్టాయి సగం మాత్రమే అతుక్కుని ఉన్నవి కావున అవి తెగిపడి ఆస్తి నష్టం ప్రాణనష్టం జరగకముందే వైర్లు సరిచేసి స్తంభం వేయగలరని మనవి (మాచన్ పల్లి నుండి నందర్ ఖాన్ పెట్ కు వెళ్లే దారిలో ఈ సమస్య కలదు.</p> | <p>మీ సమస్య ను దగ్గర్లో ఉన్న సబ్ డివిజన్ లెదా సెక్షన్ ఆఫీస్ లెదా సి .ఎస్ .సి (వినియోగదారుల సేవ కేంద్రం లో) ఫిర్యాదు చెయ్యగలరు</p> |

131) [M.P. Pentayya](#), Charlaguda (V), Shabad (M), R.R Dist-59217

|  | Objections / Suggestions  | Responses   |
|--|---|---|
|  | <p>నేను M P పెంటయ్య R / o చర్లగూడ షాబాద్ మండల్ రంగారెడ్డి జిల్లా వాసిని<br/>ట్రాన్స్ ఫారం గల విద్యుత్ లైను షాబాద్ చెరువులో నుండి లైను కలదు అట్టి<br/>లైను వాళ్ళ చిరువు నిండి నప్పుడు విద్యుత్ లైను చెడిపోవడం జరుగుతుంది<br/>( అనగా ) ( చెరువులో ఉన్న వైర్లు స్తంబాలు విరిగినందున్న చెట్ల వైర్లకు<br/>తాకడం వల్ల లైను ఆగిపోయే రోజుల పొడవున విద్యుత్ సరాఫర ఆగిపోతుంది<br/>వ్యవసాయం చేయలేక పోవడం జరుగుతుంది గతంలో పై విషయా చెప్పిన<br/>ట్రాన్స్ ఫారం మార్చిన్నారు కానీ లైను మార్చిలేదు గత జులై మాసంలో ౨౮<br/>రోజుల పాటు కరెంటు సరపరా నిలిచి పోయింది ఇది విషయం పై AE ADE DE</p> | <p>ఇప్పటికే ఉన్న లైన్ రీ రూటింగ్ కోసం 1 KM 11KV లైన్<br/>అవసరం.</p> |

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| <p>గార్లకు చెప్పిన మరమత్తు నుచ్చుకోలేదు మాటలతో గొడవ కూడా జరిగింది<br/>ఫోన్ ద్వారా కావున లైను మార్చగలరాన్ని ( చెరువులో నుండి ఉన్న లైను )<br/>మార్చగలరని మనవి.</p> |  |
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132) [Lingala Krishnaiah](#), Shabad (V), Shabad (M), R.R Dist- 509217, ph:- 9866789759

| Sl.No. | Objections / Suggestions  | Responses  |
|--------|---|--|
| 1      | <p>లింగాల కిష్టయ్య s / o లక్ష్మయ్య షాబాద్ నివాసం హరిజన వాడ నా యొక్క ఇంటి పై నుంచి LT లైన్ వేసినారు ఆ యొక్క స్తంభములకు తీసి ప్రక్కన వేయాలి నా యొక్క ఇంటి పై నుంచి నా యొక్క పిల్లలకు అసాయమున్నది దయ చేసి నా యొక్క LT లైన్ స్తంభము తీసి ప్రక్కకు వేగరాలని నా యొక్క మనవి.</p> | <p>ఇప్పటికే ఉన్న ఎల్ టి లైన్ చాల కాలం క్రితం నిర్మించబడింది, అయితే వినియోగదారుడు తన ఇంటిని అప్పటికే ఉన్న లైన్ క్రింద నిర్మించుకున్నాడు. ముందుగానే పిప్టింగ్ ఛార్జీలు చెల్లించినచో లైన్ తీసివేయబడును.</p> |

133) [Thonta Narsimulu](#), Shabad (V), Shabad (M), R.R Dist- 509217, Ph:- 9398505364

| Sl.No. | Objections / Suggestions   | Responses   |
|--------|--|---|
| 1      | <p>తొంట నర్సింలు s / o చంద్రయ్య షాబాద్( మం) షాబాద్ నా యొక్క ట్రాన్స్ ఫార్మర్ సర్వే నెంబర్ ట్రాన్స్ ఫార్మర్ యున్న స్థలముకై భూమి యొక్క నెంబర్ 20 లో యున్నది ఆ యొక్క భూమి చుట్టూ కాంపౌండ్ వాల్ పెట్టినాము మీకు పోవడానికి రావడానికి విల్లా కూడా ఉంది కనుక దయచేసి ట్రాన్స్ ఫార్మర్ అక్కడ నుండి తీసి రోడ్ ప్రాక్కన కు వేయవలసిందిగా కోరుతున్నాము.</p> | <p>ట్రాన్స్ ఫార్మరు ను మార్చడం కోసం వినియోగదారుడు షిఫ్టింగ్ చార్జీలు, సమ్మతి లేఖను సమర్పించాలి.</p> |

134) [K Jagdeesh](#), Kakloor (V), Shabad (M), R.R Dist-509217, Ph:- 7702690792

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>అయ్యా నేను అనగా కావలి జాగదీష్ s / o కావలి ఆశయ్య గ్రామం కక్కులూర్ మండల్ పాబాద్ రంగారెడ్డి నివాసిని మా దగ్గర అనగా కక్కులూర్ గ్రామం లో గడిబాయి దగ్గర ట్రాన్స్ ఫార్మర్ అలాగే ఫ్రాంటోన్ భాయీ ట్రాన్స్ ఫార్మర్ లు గలవు వీటికి on / off (ఆన్ ఆఫ్) లు లేవు తద్వారా చాల ఇబ్బందులు ఎదుర్కొంటున్నాము ఇదివారికి ఒక బర్రె చనిపోయింది అలాగే ఒక అనగా k జంగయ్య అనే వ్యక్తి కూడా షాక్ తగిలింది తద్వారా చాల ఇబ్బందులు ఎదుర్కొంటున్నాము మాకు మీ ద్వారా ట్రాన్స్ ఫార్మర్ లకు ఆన్ ఆఫ్ (on / off ) లు ఇవ్వగలరని.</p> | <p>ఇట్టి పనిని 5 రోజులలో వ్యవసాయ DTR కు AB స్వీచ్ ఏర్పాటు చేస్తాము.</p> |

135) [D Krishna](#), Saireddy Guda (V), Shabad (M), R.R Dist- 509217, Ph:- 9908934347

| Sl.No. | Objections / Suggestions  | Responses                            |
|--------|---|--------------------------------------|
| 1      | <p>దోనూరి కృష్ణ s / o రామకృష్ణయ్య గ్రా సాయిరెడ్డి గూడెం మండల్ షాబాద్ జిల్లా రంగారెడ్డి నా యొక్క బోర్ మోటార్ కు ట్రాన్స్ ఫార్మర్ నుండి వచ్చే లైను సరిగ్గా లేదు వైర్లు తాకుకొని పడే పడే ఫిజ్జు పోతున్నవి అధికారులకు ఫోన్ చేస్తే రెండు మూడు రోజులకుగానీ రావడంలేదు లేదా LC ఇస్తాం చేసుకోండి అంటున్నారు కావున దయచేసి స్తంబాలు వైర్లు సరిచేసి కరెంటు అంతరాయం లేకుండా చూడగలరని మనవి.</p> | లూజ్ లైన్లు 10 రోజుల్లో సరిచేయబడతాయి |

136) [Y. Srinivas Reddy](#), Mallareddy guda (V), Shabad (M), R.R Dist-509217 ph:- 6302962303

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>నేను అనగా మేటిజర్ల శ్రీనివాస్ రెడ్డి s / o బుచ్చిరెడ్డి గ్రామము మల్లారెడ్డి గూడం మం షాబాద్ జిల్లా రంగారెడ్డి నాయుక్క స్వంత భూమి సర్వే నెంబర్ 1530 లో గత ఏర్పాటు చేసిన ట్రాన్స్ ఫార్మర్ కు స్తంభాలు ఒరిగిపోయినది అధికారుల దృష్టికి ఎన్ని సార్లు మోర పెట్టుకున్నా వాళ్ళు స్పందించాము లేదు దయచేసి తొందరగా మరమత్తు చేసి ట్రాన్స్ ఫార్మర్ కు మరియు రైతుల బోర్ మోటార్ కనెక్ష ఇవ్వవలసినదిగా కోరుచున్నాము.</p> | <p>శ్రీ వై. శ్రీనివాస్రెడ్డి మరియు ఇరుగుపొరుగు వారి భూమి సరిహద్దుతో పాటు ఎల్టీ లైన్లు, స్తంభాలు ఏర్పాటు చేయగా, అదే లైన్ పోల్స్ను పొరుగు భూ యజమానులు తొలగించి నేలపై వేశారని, అయితే స్తంభాలు గాలికి పడిపోయాయని వినియోగదారుడు తెలిపారు. ఇదే విషయాన్ని పరిశీలించి స్థానిక సిబ్బందితో పాటు వినియోగదారులను విచారించి, తొలగించిన స్తంభాలను ఫోటోలు తీయించగా, గాలికి స్తంభాలు పడలేదని, ఒక్క స్తంభం కూడా విరిగిపోలేదని, గాలికి పడిపోయినా,</p> |



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|  |  | <p>విరిగిపోలేదని గమనించారు. ఇదే విషయాన్ని వినియోగదారునికి వివరించి, స్తంభాలను తిరిగి అదే స్థలంలో వేయడానికి పొరుగు భూ యజమానుల నుండి నిరభ్యంతరాన్ని పొందాలని అభ్యర్థించారు. ఇది గతంలో ఏర్పాటు చేయబడింది కానీ వినియోగదారు నుండి ఎటువంటి ప్రతిస్పందన లేదు.</p> |
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137) [Yalala lavanya](#), Gollargudem (V), Shabad (M), R.R Dist-509217, ph:- 9866606763

| Sl.No. | Objections / Suggestions   | Responses  |
|--------|--|--|
| 1      | <p>యాలాల లావణ్య రవీందర్ రెడ్డి (V ) గోబర్ గూడెం (M ) షాదాబ్ DD<br/> కట్టినము 224380 నెంబర్ కట్టిన రిజిస్టర్ నెంబర్ 15102021338 ఈ<br/> యొక్క నెంబర్ రిజిస్టర్ అయినది వర్క్ అయి కట్టు రికార్డు చేసినారు కానీ నా<br/> దగ్గర ఎలాంటి పని జరగలేదు కనుక నా యొక్క వర్క్ కంప్లైయింట్ చేసి<br/> కనెక్షన్ ఇవ్వవలసిందిగా కోరుతున్నాను.</p> | <p>FIFO అమలు కారణంగా వ్యవసాయ సేవలు<br/> ఆలస్యమయ్యాయి. FIFO ఇటీవల తీసివేయబడింది. పని<br/> జరిగినట్టుగా ఎక్కడ రికార్డు చేయలేదు. అంచనా ప్రకారం<br/> స్తంభాలను నెలకొల్పుతూ వారంలోగా పని పూర్తి<br/> చేయబడుతుంది.</p> |

138) [E.Somajee](#), Sathapur (V), Palakurthe (M)I, Jangaon(Dist)- 506167, ph:- 9000719745

| Sl.No. | Objections / Suggestions  | Responses  |
|--------|---|--|
| 1      | <p>శతపురం గ్రామం పాలకుర్తి మండలము జనగాం జిల్లా లో కలసి గ్రామం మధ్యలో SS 1 ట్రాన్స్ ఫార్మర్ గత 20 సవత్సరాముల ముంది తీవ్ర ఇబ్బందులు పడుచున్నారు వర్ష కాలంలో ఉరుములు మెరుపులు వచ్చినప్పుడు అక్కడ నివసిస్తున్న ప్రజలు తీవ్ర ఇబ్బందులకు సరి అవుచున్నారు సుమారుగా 20 మంది గాయ పడ్డారు మరియు గొర్రెలు బర్రెలు మేకలు కూడా విద్యుత్ షాక్ కు బలి అయి పోయాయి కావున మా గ్రామం మందు దయ దలచి ఉరి మధ్యలో వున్న ss 1 100 ట్రాన్స్ ఫార్మర్ ను తొలగించి బయట వేయగలరని మా గ్రామా ప్రజల మనవి దీని ఫోటో జతపర్చిననూ మీ భారతీయ కిసాన్ సంగం.</p> | <p>జనగామ జిల్లా , పాలకుర్తే అనె మండలం టి ఎస్ ఎస్సీ డి సి ఎల్ పరిధి లో కి రాదూ.</p> |

139) [Gireddy Satyanarayana Reddy](#), Sankepally gudem (V), , Shabad (M), R.R Dist- 509217, 9949084846

| Sl.No. | Objections / Suggestions   | Responses  |
|--------|--|--|
| 1      | <p>నేను అనగా గిరుడ్డి సత్యనారాయణరెడ్డి BKS జిల్లా కార్యవర్గ సభ్యుడిని విషయము ఏమనగా రంగారెడ్డి జిల్లా చేవెళ్ల మండలంలో మా యొక్క రైతు సోదరులు అర్జిపెట్టుకున్న విద్యుత్ సప్లై 500 మందికి మీరు సప్లై ఇవ్వడానికి దాదాపుగా 2 నుండి 3 సంవత్సరాలుగా సమయం అవుతుంది పని ఆలస్యము చేసినందున ధరలు పెరిగాయంత అదనంగా శ్రమ డబ్బులు రైతుల పై వేస్తున్నారు ఎందుకోసం ఆలస్యం చేస్తున్నారు అంటే జవాబు లేదు ఇది కాంట్రాక్టర్లకు లాభం చేయడానికి అని నా యొక్క అనుమానం విడిదవిధానాల ప్రకారం ఒక్క రైతు విద్యుత్ కనెక్షన్ కై 2 నుండి 3 సం !! దిగవలసిన సరే</p> | <p>FIFO అమలు కారణంగా వ్యవసాయ సేవలు ఆలస్యమయ్యాయి. FIFO ఇటీవల తీసివేయబడింది. ఇప్పుడు త్వరలో పని పూర్తి చేయడం జరుగుతుంది.</p> |

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| <p>ఒకవేళ ఎందుకు ఆలస్యము జరుగుచున్నది మా యొక్క భారతీయ కిసాన్<br/>సంగం సంఘానికి వ్రాతపూర్వకంగా వ్రాహిస్తే మేము ప్రభుత్వం ద్రుస్తికి తీసుకు<br/>వెళతామని కాలయాపన చేయకుండా ఇబ్బందులు లేకుండా రైతులకు<br/>భారంవేయకుండా విద్యుత్ సప్లై చేయవలసిందిగా కోరుచున్నాము .</p> |  |
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140) [L Chinnayya](#), Cherlaguda (V), Shabad (M) ,R.R Dist- 509217

| Sl.No. | Objections / Suggestions  | Responses                            |
|--------|---|--------------------------------------|
| 1      | <p>L. చిన్నయ్య s / o జంగయ్య R / o చెర్లగూడ మండల్ పాబాద్ రంగారెడ్డి జిల్లా కు చెందిన నేను నా యొక్క వ్యవసాయ భూమి sno 903 / ఆ 2 గాలా భూమిలో కరెంటు పెద్ద వైర్లను మరియు చిన్న వైర్లు గాలి వానలకు తగులుకుని ప్రక్కనే ఉన్న వ్యవసాయ బోరు భూమికి తగిలి మంటలు రగులుతున్నాయి A E గారి చెప్పిన వినిపించుకోవడం లేదు కావున సరిచేయించగలరు .</p> | లూజ్ లైన్లు 10 రోజుల్లో సరిచేయబడతాయి |

141) [S Venkatayya](#), 5-56, CHERLAGUDA (V), SHABAD(M) ,R.R Dist- 509217

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>నేను S. వెంకటయ్య s / o సీ. జంగయ్య R / o చెర్లగూడ షాబాద్ మండల్ రంగారెడ్డి జిల్లా వాసిని మా యొక్క ఇంటి నెం : 5 - 56 అనునది గత 18 సంవత్సరముల నుండి ఉన్న ఇంటిని అనుకొన్ని గత 2 సంవత్సరాల క్రితం కొత్త లైను వేసినారు అట్టి లైను మా ఇంటిని తాకుతుంది అందువల్ల మా ఇంటికి అప్పుడప్పుడు కరెంటు షాక్ తగలడం వల్ల ప్రాణాపాయం పొంది ఉంది కావున ఇంట్లో నివసిస్తున్న వారందరికి ఇంటిన్ని తాకుతున్న వైర్లను మర్చి మాములుగా ప్రాణాపాయం నుండి కాపాడి వైర్లను తొలిగింపజేయగలరని మనవి.</p> | <p>ఇప్పటికే ఉన్న ఎల్ టీ లైన్ చాల కాలం క్రితం నిర్మించబడింది, అయితే వినియోగదారుడు తన ఇంటిని అప్పటికే ఉన్న లైన్ పక్కన/ దగ్గరలో ఇంటిని నిర్మించుకున్నాడు. ముందుగానే పిస్టింగ్ ఛార్జీలు చెల్లించినచో లైన్ తీసివేయబడును.</p> |

142) [K Anjaiah](#), Sankepally (V), Shabad (M), R.R Dist-509217, ph:- 7780697702

| Sl.No. | Objections / Suggestions  | Responses  |
|--------|---|--|
| 1      | <p>కొవ్వరి అంజయ్య s / o బుచ్చయ్య గ్రా సంకెపల్లి గూడెం మా షాబాద్ ట్రాన్స్ ఫార్మర్ కు వచ్చి లైన్ నా యొక్క బోర్ పైన యున్నది దాన్ని సైడ్ కు వేయగలరని మనవి బోర్ మోటార్ కలి పోయినప్పుడు పైపులు వేయాలన్న పోలారంపాదర్ లైన్ బండ్ చేయవసి వస్తున్నది ఒక వేల మోటార్ కలి పోయిన 3 , 4 times సార్లు బండ్ చేయవలసి వస్తుంది ఇలా బండ్ చేయడం వలన ఒక ఫీడర్ కింద యున్న రైతులకు ఇబ్బందికలుగుతున్న రెండు వెయ్యి మందే రైతులు విద్యుత్ ఆపవలసివస్తుంది ఈ యొక్క ఉద్దేశపూర్వకంగా నా</p> | <p>అగ్రికల్చర్ మోటార్ మీదుగా లైను వెళుతోంది, లైన్ పిష్టింగ్ కోసం అభ్యర్థించబడింది.</p> |



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| <p>బోరు వారి కంచి విద్యుత్ లైన్ లోపాకెళ్లారు కనుక దయచేసి లైన్ ప్రక్క<br/>వలసిదేగ్గ కోరుతున్నాము దాని పై ఒక సరి కంప్లెయింట్ ఇచ్చిన వెయ్యలేము<br/>కావున దయచేసి ప్రాబ్లెమ్ అర్దం చేసుకోగలరు సమస్య తీర్చగలరని నా<br/>యొక్క మనవి.</p> |  |
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143) [M.Chinnayya](#), Shabad (V), Shabad (M), R.R Dist-509217, ph:- 8187840584

| Sl.No. | Objections / Suggestions   | Responses  |
|--------|--|--|
| 1      | <p>M చేన్నయ్య s / o కిష్టయ్య నా యొక్క ఇంటి పై నుంచి LT లైన్ యున్నది నాకు ఆసయము ఉన్నది కనుక దయచేసి LT లైన్ ను తీసి రోడ్డు ప్రక్కన వేయగలరని నా యొక్క మనవి షాదాబ్ హరిజన వాడ లో యున్నది షాదాబ్ (V ) షాదాబ్ హరిజన వాడ నా యొక్క కంప్లెయింట్ స్వీకరించ గలరని నా యొక్క మనవి నాకు అనుక్షణము ప్రాణాప్రాయము యున్నది ఇతి కలం లో షాట్ సర్కిట్ అయినది మీటర్ నెంబర్ 5100801886.</p> | <p>ఇప్పటికే ఉన్న ఎల్ టి లైన్ చాల కాలం క్రితం నిర్మించబడింది, అయితే వినియోగదారుడు తన ఇంటిని అప్పటికే ఉన్న లైన్ క్రింద నిర్మించుకున్నాడు. ముందుగానే పిప్టింగ్ ఛార్జీలు చెల్లించినచో లైన్ తీసివేయబడును.</p> |

144) [K Shankarayya](#), Kakloor(V), Shabad (M), R.R Dist- 509217, ph:- 8897710221

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>నేను అనగా k kavali Srinivas s / o kavali Senkaraiah (v ) కక్కులూర్ (M ) shabad (Dist ) రంగారెడ్డి నివాసిని మా ఇల్లు కేశారం రోడ్డు కక్కులూరి చివరికి వుంటుంది మా ఇంటి వద్ద కరెంటు పోల్ మరియు స్ట్రీట్ లైట్ లేదు గ్రామ సర్పంచ్ గార్ని చెప్పిన అలాగే ఎవ్వరికి చెప్పిన పట్టించు కోవడం లేదు తద్వారా ఇబ్బందికలుగుతున్నవి ఇంట్లోకి పాములు రావడం జరుగుతున్నది ఈ సమస్య విడిలైట్ మరియు పోల్ వేయించగలరని మనవి H .no 3 – 16.</p> | <p>స్ట్రీట్ లైట్ కు సంబంధించినవి జి ఎమ్ ఎం సి వాళ్లకి పిర్యాదు చెయ్యండి</p> |

145) [Sunitha Rani](#), 16-11-511/D/264/A Shalivahananagar, Dilsuknagar ph:- 9246336930

| Sl.No. | Objections / Suggestions   | Responses   |
|--------|--|---|
| 1      | <p>నేను శ్రీమతి సునీత రాణి శ్రీ లక్ష్మణ్ రావు గారి 2017 లో కాండీవాడ గ్రామములో 5 ఎకరాల పొలము తీసుకొంటిని సర్వే నెంబర్ 354/A3/A, 1.25 సర్వే నెంబర్ 354/A2 2.00 తీసుకొంటిని ఇందులో జనవరిలో బోర్ వేయించితి దానికి మార్చ్ 20 తేదీన 2021 లో DD కట్టితిని వారిలో వ్యవసాయము చేసుకునుటకు బోర్ వేయించితిని దానికి ఇంత వరకు కనెక్షన్ ఇవ్వలేదు మీరు ఈ application చూచి తొందరగా కరెంటు ఇవ్వగలరని మా మనవి.</p> | <p>WBS మూలకం సంఖ్య: A053865011201265 ద్వారా అంచనా మంజూరు చేయబడింది మరియు పనులు పురోగతిలో ఉన్నాయి.</p> |

146) [Ch Anjaiah](#), Cherlagudem (V), Shabad (M), R.R Dist-509217, ph:- 9866852552

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>నేను అనగా కీర్తి శేషులు చెక్కింపేట పైలయ్య తండ్రి సాయన్న గ్రా చెర్లగూడెం మం<br/>షాబాద్ జిల్లా రంగారెడ్డి వ్యవసాయ కనెక్షన్ ను సర్వీస్ నెంబర్ 030 గల కనెక్షన్ కు<br/>నేను తాత్కాలికంగా వీరు కొనుక్కొని వేడుకుంటున్నాను ఈ యొక్క విద్యుత్<br/>కనెక్షను ప్రమాదకంగా ఉంది మరియు ఇబ్బందికరంగా ఉన్నది ఈ యొక్క<br/>సర్వీసుకు పూర్తి స్థాయి విద్యుత్ లైను ఇవ్వవలసినదిగా కోరుచున్నాము కీర్తి<br/>శేషులు చెక్కింపేట పైలయ్య సాయన్న ఈయన యొక్క మనువడు అగు<br/>చెక్కింపేట అంజయ్య తండ్రి బాలయ్య భూమి సర్వే నెంబర్ 867 స్వంతం పట్టా<br/>చెక్కిపేట్ అంజయ్య పెరియ మార్చవలసినదిగా కోరుచున్నాము.</p> | <p>వినియోగదారుడిని చెరవాణి ద్వారా సప్రదించగా అతను<br/>సోమవారం (అంటే 07-02-2022) వరకు<br/>అందుబాటులో ఉండడని పేర్కొన్నాడు. అతడితో<br/>మాట్లాడిన తరువాత తగు చర్య తీసుకొనబడును.</p> |

147) [Gireddy Satyanarayana Reddy](#), Sankepally Gudem (V) , Shabad (M), R.R Dist- 509217, ph:- 9949084846

| Sl.No. | Objections / Suggestions   | Responses   |
|--------|--|---|
| 1      | <p>నేను అనగా గిరుడ్డి సత్యనారాయణరెడ్డి గ్రామము సంకెపల్లి గూడెం షాదాబ్ అయ్యా 18004253600 టోల్ ప్రీ నెంబర్ వాళ్ళు ఫోన్ చేయగా AE మరియు ADE నెంబర్ ఇచ్చి వారితో మాట్లాడమని చెన్నుచున్నారు రికార్డు చేయడం లేదు మేము ఫిర్యాదు చేసిన ఫిర్యాదు సంఖ్య ఇవ్వడం లేదు ఒక వేల తప్పని సరిగా ఫిర్యాదు సంఖ్య తీసుకున్న గడువు తర్వాత ఫిర్యాదు సమస్య వారికి తీర్ లేదు అని విచారణ జరిపి రికార్డు చేయడం లేదు కనుక ఫిర్యాదు అందేనా తర్వాత పని జరగలేదు విచారణ జరిపి రికార్డు చేయవలసింది కోరుతున్నాము.</p> | <p>ఈ సమస్య టోల్ ప్రీ నెంబర్ కి సంబంధించినది. దయచేసి ఈ పరిష్కారాన్ని సంబంధిత శాఖ (SCADA) వారిని సంప్రదించవలెను</p> |

148) [S Sangayya](#), cherlaguda (V), shabad (M), R.R Dist-509217, ph:- 9010391430

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>నేను సిద్ధం వారి సంగయ్య s / o జంగయ్య R / o చెర్లగూడ మండల్ షాబాద్ రంగారెడ్డి వాసిని మా యొక్క వ్యవసాయ పోలాములో గాల ట్రాన్స్ ఫార్మేర్లు ఫినిషింగ్ లేనందున ప్రమాదవశాతుగా ఉంది గతములో పశువులు మరణించడం జరిగింది ఇతి విషయం పై షాదాబ్ A E గారికి విన్నవించడం జరిగింది అయినా ఫినిషింగ్ చేయడం లేదు కావున మనుషులకు ప్రమాదం జరగాకొండ సినిషింగ్ చేయగలరాణి మాతో మనవి.</p> | <p>వ్యవసాయ DTR కు అంచనా సిద్ధం చేసి 15 రోజులలో అమలు చేస్తాము.</p> |

149) [E.Somajee](#), Shathapur (V),Palakurthy( mandal), Jangaon (D)-506167 ph:- 9000719745

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>శతపురం గ్రామం పాలకుర్తి మండలం జనగాం జిల్లా శాబాపురం గ్రామంలో మెయిన్ రోడ్ అనగా బిటి రోడ్డు విధి లైట్స్ లేవు కావున గ్రామం వైకుంఠధారం నుండి ఉరి చివరి వరకు అనగా పోచమ్మ టెంపుల్ వరకు విధి స్తంబాలు వేయించి ఉరికి విధి లైట్స్ వెలిగే వేదంగా చేయ గలని మా గ్రామా ప్రజల మనవి మరియు గ్రామ వీధిలో లూజు పోల్స్ అక్కడ అక్కడ వేయి వలసి వున్నది గతం లో వెసినా స్తంబాలు మధ్యలో కొత్త స్తంబాలు మంజురు చేయగలరు అదే విధంగా అంగన్నాడి కేంద్రము    నుండి అవిటిసి శ్రీనివాస్ పశువుల కొట్టము వరకు సింగల్ పేస్ లైన్ మంజురు చేయగలరు దీనికి సంబంధించిన ఫోటోలు జతపర్చినది.</p> | <p>జనగామ జిల్లా , పాలకుర్తే అనె మండలం టి ఎస్ ఎస్సీ డి సి ఎల్ పరిధి లో రాదూ.</p> |



150) [E.Somajee](#), Shathapur (V),Palakurthy( mandal), Jangaon (D)-506167 ph:- 9000719745

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>శతపురం గ్రామం పాలకుర్తి మండలము జనగాం జిల్లా గ్రామంలోని నాయిని ఎల్లారెడ్డి గారి ఇంటి మధ్య లో ఉన్న కరెంటు స్తంభం లైను ను తొలిగించి మెయిన్ రోడు కు పిష్టి చేయగలరు అదే విధంగా మెయిన్ రోడ్ లైను ను కొత్తగా వేయగలరు కావున మాయందు దయ దలచి మంజురు చేయగలరని నా యొక్క మనవి సంబంధిత ఫోటో జత పర్చబడినవి.</p> | <p>జనగామ జిల్లా , పాలకుర్తి అనె మండలం టి ఎస్ ఎస్పి డి సి ఎల్ పరిధి లో రాదూ.</p> |

151) [K Jagdeesh](#), Kakloor (V), Shabad (M) R.R Dist-509217, ph:-7702690792

| Sl.No. | Objections / Suggestions   | Responses  |
|--------|--|--|
| 1      | <p>నేను అనగా కావలి జాగదీష్ s / o కావలి ఆశయ్య గ్రామం కక్కులూర్ మండల్ షాబాద్ రంగారెడ్డి నివాసిని మా ఇంటి దగ్గర ఉరి సర్వీస్ వైరు మా ఇంటి మీదగా వెళ్తుంది తద్వారా షాబాద్ వర్షం టైం లో ఇల్లు షాక్ తాకడం జరుగుతుంది తద్వారా ఇబ్బంది గురైతున్నాము దీన్ని కొంచం దూరం నుండి అనగా రోడ్డు పక్కనుండి తీసుకువెళ్ళా గలరని మనవి (ఉరి కనెక్షన్ వైరు H.No. 1-46/1</p> | <p>ఇప్పటికే ఉన్న ఎల్ టి లైన్ చాల కాలం క్రితం నిర్మించబడింది, అయితే వినియోగదారుడు తన ఇంటిని అప్పటికే ఉన్న లైన్ క్రింద నిర్మించుకున్నాడు. ముందుగానే పిప్టింగ్ ఛార్జీలు చెల్లించినచో లైన్ తీసివేయబడును.</p> |

152) [Deshetty Tirupathi](#), Putloor (V) Siddipet Rural (M), Siddipet(D)- 502103 ph:- .

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>సిద్దిపేట జిల్లా సిద్దిపేట రురల్ మండలం పుచర్లు గ్రామంలోని నాగుకుంటకు అనుకోని ఉన్న ట్రాన్స్ ఫార్మర్ నాగులకుంట నిండి నందున నీళ్ళలోనే ట్రాన్స్ ఫార్మర్ ఉంది దీని వాళ్ళ రైతులకు ప్రాణ భయం ఉంది చాల కరెంటు సమస్యలు వస్తున్నాయి కావున దయచేసి వీళ్ళో ఉన్న ట్రాన్స్ ఫార్మర్ ను వేరే చోటికి మార్చగలరని మనవి ఈ ట్రాన్స్ ఫార్మర్ పై 25 బావులు ఉన్నందున కొత్త 25 HP ట్రాన్స్ ఫార్మర్ మంజురు చేయాలనీ విన్నపం.</p> | <p>దీనికై సర్వే నిర్వహింపబడినది . అంచనా తయారు చేసి 30 రోజులలో పని పూర్తి చేస్తాము .</p> |

153) [K Bangarayya](#), Bijnepally (V), Timmajipeta (M), Nagarkurnool(D)- 509209, ph:- 9948586358

| Sl.No. | Objections / Suggestions   | Responses  |
|--------|--|--|
| 1      | <p>గ్రామం భవాజిపల్లి మండలం తుమ్మూరుపేట జిల్లా నగర్ కార్పూల్ నందు భవాజిపల్లి గ్రామములో 11 KV లైన్ ఇండ్ల మీద వుండటము చేత ప్రమాదం జరిగే పరిస్థితు ఉన్నందున అట్టి లైన్ 11 KV ని రోడ్ vembadi పైబడి వేయుటకు కోరుచున్నాను.</p> | <p>ఇప్పటికే ఉన్న 11 కే వి లైను చాల కాలం క్రిందట ఏర్పాటు చేయడం జరిగింది అయితే కొందరు వినియోగదారులు ఇప్పటికే ఉన్న 11 కే వి లైను క్రింద ఇండ్లు నిర్మించుకోవడం జరిగింది పిప్టింగ్ చార్జీలు చెల్లించిన మేడలలైను మార్పడం జరుగుతుందని వినియోగగారాలకు తెలియజేయడం జరిగింది□</p> |

154) [Bheemana Venkatayya](#), Bijnepally (V), Nagarkurnool- 509209, ph:- 9490091915

| Sl.No. | Objections / Suggestions   | Responses  |
|--------|--|--|
| 1      | <p>నేను తమారితో చేయు మనవి ఏమనగా గ్రామములు రైతులకు మంజూరు అయినా ట్రాన్స్ ఫారములు మెటీరియల్ మరియు దిమ్మెలు నిర్మించుకున్న రైతులకు డబ్బులు ఇవ్వకుండా AE లు కాంట్రాక్టర్ డ్రా చేసు కుంటున్నారు అదేవిధముగా ట్రాన్స్ ఫారములు రైతులు తీసుకొని పోయిన లారీ ట్రాక్టర్ యజమాని బ్యాంకు అకౌంట్ తీసుకొని ఇంత వరుకు ఐ రైతులకు ట్రాన్స్ పరము చార్జీలు ఇవ్వడం లేదు.</p> | <p>రైతులతో ఎలాంటి రవాణా చేయించకూడదని హెచ్చరించడం జరిగింది.</p> |

155) [K Bangarayya](#), Bijnepalle (V),Bawajipet (M), Nagarkurnool(Dist)-509209, ph:- 9948586358

| Sl.No. | Objections / Suggestions  | Responses  |
|--------|---|--|
| 1      | <p>నా గ్రామము భవాజిపల్లి మండలం తిమ్మాజిపేట జిల్లా నగర్ కార్పూల్ తమారితో వలనగా యునందు ఒక ట్రాన్స్ ఫారం పై దాదాపు 10 మోటార్ లు నడుచున్నవి 10 మోటార్లకు ఒకే కేబుల్ వైరు ఉండటం చేత మోటార్లు వేడికి కేబుల్ వైర్ అంటుకొని ప్రమాదం జర్గేస్తోతివున్నది కావున 10 మోటార్లకు కండక్టర్ జతపరుచుటకు కోరుచున్నాను.</p> | <p>ట్రాన్స్ ఫార్మర్ నుంచి న్నలుగు పొల్ల పరిధిలో ఎల్ టి కేబులు వైరు కాలిపోతుంది దీని స్థానంలో ఆ లిప్ మీనియం కండక్టర్ పది రోజులలో మార్చడం జరుగుతుంది</p> |

156) [Lingappa](#), Shabad (V), Shabad (M), R.R Dist- 509217, Ph:- 9885327802

| Sl.No. | Objections / Suggestions   | Responses   |
|--------|--|---|
| 1      | <p>నేను అనగా వేటూరి లింగప్ప నివాసం షాబాద్ తండ్రి వీరప్ప అయిన గూడెం పొలం దగ్గర కరెంటు స్తంభాలు రెండు వంగి ప్రమాద స్థితిలో యున్నది వీటి విషయాలు ఎలక్ట్రిసిటీ సిబ్బంది తెలియచేసిన పట్టించుకోలేదు మా ప్రక్క వ్యవసాయదారుడు పాండరయ్య కూడా తెలిపిన పట్టించుకోలేదు దయచేసి మా ఈ ఇబ్బందిని మీరన్న తోలుగా చేస్తారని వేడుకుంటున్నాము</p> | <p>రెండు వంగిన స్తంభాలను నితారుగా చేయడం ద్వారా 2 రోజులలోగా పని పూర్తి అవుతుంది.</p> |

157) [Kapari Thirupataiah](#), Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215, Mobile No.817991580

| Sl.No. | Objections / Suggestions   | Responses  |
|--------|--|--|
| 1      | కసరి తిరుపతయ్య S/o కరాయిన్నగ్రామం వండి వడ్డేమాన్ బిజినాపల్లి మండలం నగర్ కర్నూల్ జిల్లా మా యొక్క పొలం దగ్గర లూజు లైను వున్నది ఎం చేయగలరు. | మీ సమస్య ను దగ్గర్లో ఉన్న సబ్ డివిజన్ లెదా సెక్షన్ ఆఫీస్ లెదా సి .ఎస్ .సి (వినియోగదారుల సేవ కేంద్రం లో) ఫిర్యాదు చెయ్యగలరు |



158) [K Yadagiri](#), Shabad (V), Shabad (M), R.R Dist -509217, Ph:- 9989196305

| Sl.No. | Objections / Suggestions  | Responses  |
|--------|---|--|
| 1      | <p>మీతో మనవి చేయునది ఏమనగా షాబాద్ గ్రామంలో చెరువు కాలువ ప్రక్కన గల ట్రాన్స్ ఫార్మర్ కెపాసిటీ 63 కలదు ఈ ట్రాన్స్ ఫార్మర్ పైన గా బోర్ మోటార్ కనెక్షన్ లు వున్నది కనుక కెపాసిటీ సరిపోక ట్రాన్స్ ఫార్మర్ కాలిపోవటం మరియు రైతు స్టాటర్ మోటార్ లు కలిపివాడ్డం జరుగుచున్నది కావున దయచేసి ఇంకొక ట్రాన్స్ ఫార్మర్ ఏర్పాటు చేయగలరు లేనిచో ట్రాన్స్ ఫార్మర్ కెపాసిటీ పెంచగలరు దీని గురించి షాబాద్ సబ్ స్టేషన్ లో సమస్య వివరించినా మా సమస్య పరిష్కారం జరగడం లేదు కనుక దయచేసి మీ రైనా సమస్య పరిష్కరించి రైతులను ఆదుకోగలరని మా యొక్క మనవి .</p> | <p>వినియోగదారుడిని చెరవాణి ద్వారా సప్రదించగా అతను ఎవరికి డబ్బులు ఇచ్చారో, వారి పేరు వివరాలు తెలపడం లేదు. మా సిబ్బందిని విచారించగా వారు ఎవరి దగ్గర డబ్బులు తీసుకోలేదు అని చెప్పారు.</p> |

159) [Renukunta Venkatesh](#), Raghava pet (V), Siddipet(Rural) (m), Siddipet (Dist)- 502107, Ph:- 9866180113

|  | Objections / Suggestions  | Responses   |
|--|---|---|
|  | <p>నా గ్రామం రాఘవాపురం నా పేరు రేణికుంట వెంకటేష్ S/o మల్లయ్య మా యొక్క వ్యవసాయ బావివండ 10 ఇనుప స్తంభాలు కలవు మరియు వాటి మధు నున్నటు వంటి కరెంటు వైర్లు కూడా చాల లూజుగా వున్నవి దీని వలన మాకు ప్రాణాపాయం వుంది దీనిని తొందరగా బాగు చేయగలరని మా యొక్క ప్రార్థన.మా యొక్క ట్రాన్స్ ఫార్మర్ అయినప్ప కల్లా సంబంధిత అధికారులు వాటి సారి పాడా సామాను మరియు ఆ ట్రాన్స్ ఫార్మర్ కాళీ పోయిన్చు దాని టాన్స్ పోర్ట్ ఖర్చు కూడా రైతుల పైనే భారం వేస్తున్నారు ఇంటి సమస్యలను పరిష్కరించి వలసిదిగా మా ప్రార్థన.</p> | <p>మీ సమస్య ను దగ్గర్లో ఉన్న సబ్ డివిజన్ లెదా సెక్షన్ ఆఫీస్ లెదా సి .ఎస్ .సి (వినియోగదారుల సేవ కేంద్రం లో) ఫిర్యాదు చెయ్యగలరు<br/>         లొకేషన్నుండి ఎస్ పి ఎం షెడ్ కి విఫలమైన ఎజిఎల్డిటి ఆర్ రవాణాకు మరియు ఆరోగ్యకరమైన డిటిఆర్ తిరిగిఅదే మండలపరిధిలో రవాణా చేయడానికి రూ.750/- రవాణా ఛార్జీలు మరియు ఇతర మండల్ అధికార పరిధిలో రవాణా చేయడానికి రూ.1000 చెల్లించాలని యాజమాన్యం ఆదేశాలు జారీచేసింది.</p> |

160) [Ravula Kristaiah](#), Mitta kanakal village, pudur (md), kadumoor post vikarabad Dist, M.No.9177549044

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>బోరు బావికి విద్యుత్ లైన్ ఏర్పాటు చేయుట గురించి వికారాబాద్ జిల్లా పోడూరు మండలం విట్టకంకల్ గ్రామానికి చెందిన సర్వే నెంబర్ SC.No. B166000218 USC 102930557 , 41 లు ఉన్న బోరు బావికి DD కట్టిన తేదీ 01/04/2019 ఇప్పటి వరకు లైన్ ఏర్పాటు చేయలేదు కావున లైన్ ఏర్పాటు చేయగలరు.</p> | <p>వినియోగదారుడి చరవాణి ద్వారా పరిశీలించగా,యం. పోచయ్య డి.డి.కి సంబంధించిన 2 విద్యుత్ స్తంభాలు మరియు కేబుల్ వైర్లను వారం రోజుల్లో అమర్చడం జరుగును.</p> |

161) [M.Pochaiah](#), Mitta kanakal village, pudur (md), kadumoor post vikarabad Dist-501202 ,M.No.8106370626

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>బోరు బావికి విద్యుత్ లైన్ ఏర్పాటు చేయుట గురించి వికారాబాద్ జిల్లా పోడూరు మండలం విట్టకంకల్ గ్రామానికి చెందిన సర్వే 60 నెంబర్ లు ఉన్న బోరు బావికి DD కట్టిన తేదీ ఇప్పటి వరకు లైన్ ఏర్పాటు చేయలేదు కావున లైన్ ఏర్పాటు చేయగలరు</p> | <p>వినియోగదారుడి చరవాణి ద్వారాపరిశీలించగా, యం. పోచయ్య డి.డి.కి సంబంధించిన 2 విద్యుత్ స్తంభాలు మరియు కేబుల్ వైర్లను వారం రోజుల్లో అమర్చడం జరుగును.</p> |

163) [G Gajender](#) S/o: Bheemaiah, 3-6, Nagerkunta (Vill), Shabad (Mdl), RR District-509217, Ph:- 9866151825

| Sl.No. | Objections / Suggestions   | Responses                       |
|--------|--|---------------------------------|
| 1      | అధికారులు వినియోగదారుతో జరిపే ఉతార్థ ప్రత్యుత్తరాలు తెలుగు లోనే జరిగేలా చర్యలు తీసుకోగలరు. | మీ యొక్క సూచనలు గమనించ బడ్డాయి. |

164) [Bojarajula Masaiah](#), Mustipally palli (V), Kandurg , Jadcherla (M), Post, RR District-509217, Ph:-9640110975

| Sl.No. | Objections / Suggestions  | Responses  |
|--------|---|--|
| 1      | <p>రంగారెడ్డి జిల్లా చాదర్ గుడ మండలం గ్రామం మునిసిపాలిటీ నా పేరు బోవరాజుల మాసయ్య నా పొలం లోను పెద్ద లైను వైర్లు తీసుకు కొని వెళ్ళారు దాని వైర్లు కిందికి వేలాడుతూ వున్నాయి చాల ప్రమాదకరం వున్నవి కాబట్టి అధికారులు గుర్తించి ఇంకో స్తంభం వేసి సరి చేయగలరని మనవి</p> | <p>ఒక ఇంటర్మీడియట్ పోల్ అవసరం, ఏడు రోజుల్లో సరిచేయబడుతుంది</p> |

165) [Gorla Balaiah](#), Mustipally Katti & Edira Vill Kandurg Mdl., Jadcherla Post, RR District-509217, ph:- 9652359780

|  | Objections / Suggestions  | Responses   |
|--|---|---|
|  | <p>నేను అనగా గొర్ల బాలయ్య శంకరయ్య అను నాకు సర్వే నెంబర్ 714 లో భూమిలో బోరు ఉన్నది dd 0084 తో కట్టనుపెద్ద లైను న పొలం నుండి వేశారు దాని కిందనే న బోరు ఉన్నది నేను బోరు కాళీ పోయినప్పుడు బోరు పోలికదానికి దింపడానికి చేసేటప్పుడు వైర్లు ఆహుతున్నది దాని వలన మనుషులకు చాల ప్రమాదకరంగా ఉన్నది నాకు ఒకే బోరు ఉన్నది చాల ప్రాబ్లెమ్ వున్నది కాబ్బటి దయచేసి అదికారులు గుర్తించి చేయగలరని మనవి అదే విధంగా ట్రాన్స్ పరం 712 లో రోడ్డుకు పక్కన రోడ్డు కిందికి అయినది రాదు మీద పిల్లలకు జంతులికు చాల ప్రమాదకరంగా వున్నా అక్కడ బాస్ స్టాప్ కూడా వున్నది ప్రాణాలు చాల కరిదైనవి ఏంటో విలువైనవి కాబ్బటి తొందరగా చేయగలరని మనవి.</p> | <p>చెల్లించడానికి వినియోగదారు సమ్మతి లేఖ ఇవ్వాలి డెవలప్ మెంటరీ కాంట్రీబ్యూషన్ వర్క్స్ కింద షిఫ్టింగ్ కోసం సంబంధిత అంచనా ఛార్జీలు 2)పంపిణీ టాన్స్ ఫార్మర్ పక్కన కొత్త రహదారి నిర్మాణం కారణంగా ఎత్తు చాలా తక్కువగా ఉంది, ప్లింత్ 10 రోజుల్లో పెంచబడుతుంది</p> |

166) [Anupuram Narasimlu](#), S/o: Chandraiah, Daivalagudem (Vill), Nagarkunta, Shabad (Mdl)., RR District- 509217, ph:-  
9010516399

| Sl.No. | Objections / Suggestions   | Responses   |
|--------|--|---|
| 1      | <p>నాగరకుంట గ్రామా పరిధిలోని గ్రామం అయినా దైవలగూడ మండలం షాబాద్ జిల్లా రంగారెడ్డి అయినా మైసమ్మ గుడి దగ్గర ఉన్న వ్యవసాయ పొలం రెండు స్తంభాలు ఓకే దగ్గర ఉన్నాయి కావున వ్యవసారం చేయదని ఇబ్బందిగా ఉంది దయచేసి ఈ యొక్క లైను మార్పిడి చేయగలరు అదేవిధంగా ఒక పోలు సరి చేసి పాత గలరు.</p> | <p>సర్వీస్ చాలా కాలం క్రితం విడుదల చేయబడింది. పోల్ను ఒక వైపు నుండి మరొక వైపుకు మార్చడానికి వినియోగదారు పిష్టింగ్ చార్జీలు చెల్లించినచో లైన్ మార్చబడును.</p> |



167) [T Shivakumar](#) , S/o: Narasimlu, 2-7/2, Daivalagudem Vill, Nagarkunta, Shabad Mdl., RR District-509217, ph:-  
9948858218

| Sl.No. | Objections / Suggestions  | Responses   |
|--------|---|---|
| 1      | <p>రంగారెడ్డి జుల్లా షాబాద్ మండలం నాగరకుంట గ్రామా పంచాయతీ పరిధిలోని దైవలగూడ గ్రామం వద్ద చేత్య వైపు మామిడిపల్లి రోడ్డు పక్కన ఏర్పాటు చేసిన ట్రాన్స్ ఫార్మర్ రోడ్డు ఎత్తుకు సమానంగా ఉంది దీనివల్ల మనుషులకు పశువులకు ప్రాణహాని ఉంది అట్టి ట్రాన్స్ ఫార్మర్ ఎత్తు పెంచగలరని మనవి.</p> | <p>25 KVA DTR PWS పనుల కోసం వినియోగిస్తోంది. ట్రాన్స్ ఫార్మరు ఎత్తును పెంచుటకు అంచాన వ్యయాన్ని వేసి 15 రోజులలో పనిని పూర్తి చేస్తాము.</p> |

168) [Kadamanchi Mahendar](#) S/o Jangaiah, 2-2, Daivalagudem Vill, Nagarkunta, Shabad Mdl., RR District – 509217, Ph:- 9505929795.

| Sl.No. | Objections / Suggestions   | Responses   |
|--------|--|---|
| 1      | <p>DTR నిర్వహణ లోపం ఉంది రంగారెడ్డి జిల్లా షాబాద్ మండలం ధైవలగూడెం గ్రామంలోని గ్రామానికి వచ్చే రహదారి ప్రక్కన ఉన్న DTR కు నిర్వహణ లేదు దేంతో పశువులు మనుషులకు ప్రాణాపాయం ఉంది సరిచేయగలరు.</p> | <p>వినియోగదారుడు చెప్పిన విదముగా అచట DTR నిర్వాహన లోపము లేదు వినియోగదారుడు DTRని వేరే వైపు కు మార్చడానికి అభ్యర్థించగా పిష్టింగ్ చార్జీలు చెల్లించ వలసింది గా తెలియ చేసాము.</p> |

169) [E Venkat Ramulu](#) S/o Eshwaraiah Goud, Sarpanpallu Vill, Gottimukla Post, Vikarabad Md & Dist-501101, Ph:-  
8555831524

| Sl.No. | Objections / Suggestions   | Responses   |
|--------|--|---|
| 1      | <p>నాపేరు E వెంకటరాములు S/o ఈశ్వరయ్య గౌడ్ గ్రామము సర్పస్ పల్లి మండలం జిల్లా వికారాబాద్ మా గ్రామములో మాకు 5 మంది రైతులకు గాను ఒక ట్రాన్స్ ఫార్మర్ 6 సం క్రితం బిగించారు అది 2 సం రాలు బాగానే పని చింది ఈ 4 సం రాలు నుంచి ఇప్పటి వరకు దానికి సుమారు 25 వేల వరకు ఖర్చుచేశాము దానికి కారణం 5 మోటార్లకు గాను సన్నని కేబుల్ వైరుతో కనెక్షన్ ఇచ్చారు మరియు స్తంభానికి స్తంభానికి సుమారు 80 - 90 మీటర్లు</p> | <p>వినియోగదారుడి చరవాణి పరిశీలించగా, 2 విద్యుత్ స్తంభాలు మరియు నూతన కేబుల్ వైర్లనువారలో సరిచేయడం జరుగును.</p> |

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| <p>ద్వారా ఉన్నది కావున తరుచుగా కేబుల్ కాలిపోవడం తేలిపోదాం<br/>జరుగుతుంది ఆ కేబుల్ వైరు తెగి చేను కంచివేపడి ముగా జీవులుకూడా<br/>మరణించాయి కాబట్టి మాపై దయదలచి కేబుల్ను మరియు స్తంభాలను<br/>మరమత్తు చేయగలరని మనవి.</p> |  |
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170) [Tallapally Srinu S](#), 4-15, Daivalagudem Vill, Shabad Mdl & Posr., RR District – 509217, Ph:- 9912970342

| Sl.No. | Objections / Suggestions   | Responses  |
|--------|--|--|
| 1      | <p>వ్యవసాయ బోరు బావికి స్తంభం లైన్ ఏర్పాటు గురించి రంగారెడ్డి జిల్లా షాబాద్ మండలం దైవలగూడ గ్రామంలోని సర్వే నెంబర్ 104 లో ఉన్న బోరుబావికి ఉన్న కనెక్షన్ నెంబర్ 5202400062 కు స్తంభం లైన్ ఏర్పాటు చేయాలి లైన్ కిందికి ఉన్నది దింతో ప్రాణహాని ఉన్నది.</p> | <p>సర్వీస్ నెం.5202400064S చాలా కాలం క్రితం అనగా తేది.: 30.01.2009న విడుదల చేయబడింది. పోల్ను ఒక వైపు నుండి మరొక వైపుకు మార్చడానికి వినియోగదారుడు పిప్టింగ్ చార్జీలు చెల్లించినచో లైన్ వేయబడును సమ్మతి ఇవ్వాలి.</p> |

171) [Miryala Dasharadha](#) S/o: Venkanna, Edira Vill, Kandurg Mdl., Jadcherla Post, RR District-509207, Ph:- 9441425146

| Sl.No. | Objections / Suggestions  | Responses  |
|--------|---|--|
| 1      | <p>తమారితో మనవి ఏమనగా నేను అనగా దశరథ్ S/o వెంకన్న తన్నపర్ నుంచి బోరుకు వచ్చే LT లైను వైర్లు కిందికి మనుషులకు జంతువులకు తాకి అంట కిందికి వంగి వున్నవి కావున వీలు అయినంత త్వరగా బాగు చేయగలరని మనవి చాల ప్రమాద కరంగా వున్నవి దాని వల్ల కరెంటు తెగలు తాగేళితే మనషులు చని పొయ్యి వీలు ఎక్కువగా ఉన్నది DD నెంబర్ 00416 సర్వే నెంబర్ 771 భూమిలో ఉన్నది ఆధార్ 513791106371.</p> | <p>ఒక ఇంటర్మీడియట్ పోల్ అవసరం, ఏడు రోజుల్లో సరిచేయబడుతుంది</p> |

172) [Taruti Narasimlu](#), Edira Vill, Kandurg Mdl., Jadcherla Post, RR District -509217, ph:- 9441425146

| Sl.No. | Objections / Suggestions   | Responses  |
|--------|--|--|
| 1      | <p>విషయం ఏమనగా తర్పతాతి నర్సిములు S/o పెంటయ్య DD నెంబర్ 00305 సర్వే నెంబర్ 713 తో DD కట్టను స్తంబాలు వైర్లు లేక కట్టల మీద వైర్లు వేసుకుని మోటారు నడిపించుతున్నాను కట్టల మీద వైర్లు కిందికి వంగి వున్నవి కావున దయచేసి త్వరగా కంప్లీట్ చేయగలరని మనవి చల్ ప్రమాదకరంగా వున్నవి ఆధార్ 706161690236.</p> | <p>అతని బోర్ సమీపంలో ఇప్పటికే LT లైన్ ఉంది, కానీ స్థానిక ప్రజలు ఉన్నారు కనెక్షన్ ఇవ్వడానికి అభ్యంతరం ఉంటే, రెండు రోజుల్లో పరిష్కరించబడుతుంది అదనపు పోల్స్ అవసరం లేదు</p> |

173) [Kanna Yellaiah](#) S/o Pochaiah, Edira Vill, Kandurg Mdl., Jadcherla Post, RR District

| Sl.No. | Objections / Suggestions | Responses             |
|--------|--------------------------|-----------------------|
| 1      | NO Question              | Question not received |



174) [Kanna Raju](#) S/o Bheemaiah, Edira Vill, Kandurg Mdl., Jadcherla Post, RR District-509207 ph:- 7981243271

| Sl.No. | Objections / Suggestions   | Responses  |
|--------|--|--|
| 1      | <p>నేను అనగా కన్నా రాజు S/o బీమయ్య మా నాన్న గారి పేరు మీదా DD నెంబర్ 88 కట్టినాము 10 సం లనుంచి కట్టెల మీదా వైర్లు వేసుకుని బోర్ నడిపించున్నాము కావున అధికారులు గుర్తించి స్తంభాలు వైర్లు వెయ్యగలరని మనవి కట్టెల మీదా వైర్లు చాలా ప్రమాదకరంగా ఉంది నిత్యాం వైర్లు మనుషులకు ట్రాక్టర్ కు తగలడం వల్ల చాలా ప్రమాదం జరుగుతుంది ఆధార్ నెంబర్ 563372163525.</p> | <p>సేవ 31/01/2009న విడుదల చేయబడింది, అవసరమైన వినియోగదారు సమ్మతి లేఖ ఇప్పటికే ఉన్న లైన్ పొడిగింపు కోసం సంబంధిత అంచనా ఛార్జీలను చెల్లించడానికి</p> |

175) [T Thirupathi](#) S/o Anjaiah, 4-7, Daivalagudem Vill, Shabad Mdl & Posr., RR District – 509217, Ph:- 9705557033

| Sl.No. | Objections / Suggestions   | Responses   |
|--------|--|---|
| 1      | <p>సింగల్ ఫసె బోర్డు కి సరిమైన అడ్డంకి ఏర్పాటు మరియు కనెక్షన్ ఏర్పాటు గురించి రంగారెడ్డి జిల్లా షాబాద్ మరియు దైవలగూడ గ్రామంలో ని బాస్ స్టేజి దగ్గర ఉన్న సింగల్ ఫసె DTR అడ్డింగ్ మండుతున్నది దీనివల్ల ప్రాణహాని ఉంది మరియు గ్రామంలోని విద్యుత్ నాన్య మైనది సరిపడా కారడం లేదు సరి చేయగలరని జాలి బిగించగలు.</p> | <p>DTR పోల్ మౌంట్ చేయబడినందున కంచె అవసరం లేదు. వారం రోజుల్లో ఎర్టింగ్ పనులు పూర్తిచేస్తాము.</p> |

176) [Gunti Pedda Narayana](#) S/o Rayanna, 10-87, Vaddeman (Vill), Bijanapally (M) Nagar Kurnool 509 215, Ph:- 9391873101

| Sl.No. | Objections / Suggestions   | Responses   |
|--------|--|---|
| 1      | <p>తమారితో చేయు మనవి ఏమనగా నేను అనగా గుంటి పెద్ద నారాయణ రాయన్న మా యొక్క 10 87 మా యొక్క ఇంటి కరెంటు బిల్లు చాలా ఎక్కువగా రావడము జరుగుతుంది మాకు చాలా ఇబ్బందికారముగా ఉంది మాకు monthly 1000 రూపీస్ పైన రావడము జరుగుతుంది మాకు గత సం కింది 166 రూ రావడం జరిగింది so మాకు చాలా ఇబ్బంది గా ఉంది మా యొక్క problem చూడగలరు అని మా యొక్క మనవి.</p> | <p>మీ సమస్య ను దగ్గర్లో ఉన్న సబ్ డివిజన్ లెదా సెక్షన్ ఆఫీస్ లెదా సి .ఎస్ .సి (వినియోగదారుల సేవ కేంద్రం లో) ఫిర్యాదు చెయ్యగలరు</p> |

177) [Madyapaga Venkataiah](#), Amdapur Village, Moinabad (Mandal), Ranga Reddy (dist)-509217, Ph:- 7569617527

| Sl.No. | Objections / Suggestions  | Responses                 |
|--------|---|---------------------------|
| 1      | <p>నేను మధ్య పాగ వెంకటయ్య late లక్ష్మ య్య నివాసము ఆమ్లాపూర్ గ్రామము మొయినాబాద్ మండలం రంగారెడ్డి జిల్లా ఆమ్లాపూర్ గ్రామ రెవిన్యూ లో sy No 151 గల భూమిలో hightention poles వేసినారు దీనికి గాను నాకు నష్టపరిహారం 60000 /- అరవైయిల రూపాయలు మాత్రమే ఇచ్చినారు వేరే వాళ్ళకు అంటే 0c మరియు BC లకు 4 లక్షల వరకు ఇచ్చినారు నేను మాదిగా కులానికి ( SC ) చెంది వాన్నికాబట్టి నాకు తక్కువగా ఇచ్చినారు నాకు ఉన్న కొంచం భూమి మొత్తం పోయినది కనుక నాకు బతకడానికి చాల కష్టంగా ఉందది కావున నాకు 10 లక్షల రూపాయలు నష్టపరిహారం ఎపించి నన్ను ఆదు కోగలరని నా యొక్క మనవి</p> | TSTRANSCO కి సంబంధించినది |

178) [Madi Ranga Reddy](#), S/o Pedda Yellareddy, Kashimcheli (Village), Moinabad (Mndal), Ranga Reddy Dist-509217, Ph:-  
9949171249

| Objections / Suggestions  | Responses  |
|---|--|
| <p>నేను మడిరంగారెడ్డి S/o పెద్ద ఎల్లారెడ్డి నివాసము కసింబాలి గ్రామము మొయినాబాద్ మండలం రంగారెడ్డి జిల్లా నా యొక్క పొలము మధ్యలో Iron Poles 7 ఉన్నాయి ఈ యొక్క పోల్స్ తో వర్షం పడ్డప్పుడు మరియు వర్ష కాలంలో SHOCK కొట్టుచున్నాయి వీటి వాళ్ళ చాల మంది ప్రమాదంలో పడ్డారు ఈ యొక్క విషయం పై సంబంధిత విద్యుత్ అధికారులకు చాల సార్లు విన్నవించుకున్నా ప్రయోజనం లేకుండా పోయినది. ఈ యొక్క 7 డు Iron poles తీసి వీటి స్థలంలో CEMENT POLES వేయించి గలరని మమల్లి ప్రమాదం నుంచి ప్రమాదం నుంచి కాపాడ గలరని కోరుచున్నాము SC No 322100079 ( మా పెద్దనాన్న late మడి యాదిరెడ్డి)</p> | <p>శ్రీ.ఎస్.నారాయణరెడ్డితో కలిసి స్థలాన్ని పరిశీలించారు మరియు వారి వ్యవసాయ భూమిలో 7నం. ఇనుప స్తంభాలు బాగా మరియు చెక్కుచెదరకుండా ఉన్నాయని గమనించారు. అదే విషయం దరఖాస్తుదారునికి తెలియజేయబడింది.</p> |

179) [Kadamanchi Mallesha](#) S/O Pochaiah, 4-47, Daiwalaguda, Shabad (P & M), R R District, Mobile : 9640196764

| Sl.No. | Objections / Suggestions   | Responses   |
|--------|--|---|
| 1      | <p>వ్యవసాయ విద్యుత్ కనెక్షన్ నెంబర్ - 5202400011 రంగారెడ్డి జిల్లా షాదాబ్ మండలం దైవలగూడ గ్రామంలోని సర్వే నెంబర్ 82 లో ఉన్న వ్యవసాయ బోరుకు లైన్ ఏర్పాటు చేయగలరు లైన్ లేక వైర్లు కిందికి ఉంది ప్రాణహాని ఉంది దానిని ఏర్పాటు చేయగలరు.</p> | <p>మీ సమస్య ను దగ్గర్లో ఉన్న సబ్ డివిజన్ లెదా సెక్షన్ ఆఫీస్ లెదా సి .ఎస్ .సి (వినియోగదారుల సేవ కేంద్రం లో) ఫిర్యాదు చెయ్యగలరు</p> |

**180) [E Srinivasa Chari](#), Energy Conservation Mission, IEITSC Hyderabad**

| S.No. | Summary of Objections / Suggestions  | Response of the Licensee  |
|-------|--|---|
|       | <p><b>Agriculture Tariff &amp; related issues</b></p> <p><b>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</b></p> <p><b>A) Estimation of agriculture consumption</b></p> <p><b>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.</b></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,</p> |

|   |   |  |
|---|---|--|
|   | <p><b>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.</b></p> <p><b>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.</b></p> | <p>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> |
| 2 | <p><b>Replacement of energy efficient motors in agriculture sector.</b></p> <p><b>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</b></p>   | <p>As per DSM action plan submitted by CII, there is a potential to replace agriculture motors with energy efficient motors. Negotiations are under progress with M/s. EESL to replace motors in ESCO model</p>  |



|   |   |   |
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|   | <p>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> |   |
| 3 | <p><b>INCENTIVES TO FARMERS FOR USING LESS ELECTRICITY</b></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>TS Discoms are already providing 24/7 free power to agriculture consumers, in line with the Govt. of Telangana directives.</p> |

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|   | <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 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><b>Implementation DSM measures and inspections</b></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</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> |

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|   | <p>know, besides check on DSM measures followed by farmers, which will help to control consumption on Agl pump sets</p>  |   |
| 5 | <p><b>Electric vehicle charging Traiff</b></p> <p><b>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.</b></p> <p><b>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.</b></p> <p><b>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</b></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 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</p> |

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|   | <p>telecom at the beginning)</p> <p><b>Installation of, EV charging stations are in slow rate to build confidence on availability among the new buyers abundant stations need to establish everywhere.</b></p> <p><b>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.</b></p> <p><b>(Like petrol bunks run by IOCL, BPCL etc.,)</b></p> <p><b>Further use of EV within discom may be made mandatory so as to minimize the expenditures on officer travels, besides an example to public.</b></p> <p><b>In this regard Hon’ble commission may clarify provisions to run own EV stations by discoms.</b></p> | <p>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> |
| 6 | <p><b>Green power tariff for industrial and commercial consumers</b></p>   | <p>TS Discoms have done a detailed study to capture the existing</p>  |

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| <p><b>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.</b></p> <p><b>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.</b></p> <p><b>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.</b></p> <p><b>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&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.</b></p> <p><b>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</b></p> | <p>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> |
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|   | <p>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>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> | <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> <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%</p>  | <p>Following steps taken for reduction of losses :</p> <ul style="list-style-type: none"> <li>➤ Every month intensive inspections are being conducted by operation wings and DPE wing to minimize the theft / Direct Tapping/ Unauthorized usage of power supply to reduce the losses .The existing LT OH lines are replaced by 70sqmm LT AB cable in phased manner so that theft of energy by direct</li> </ul>  |

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| <p>which is far away from our present status.</p> <p><b>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.</b></p> <p><b>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 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.</b></p> | <p>tapping can be avoided.</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 ot officer concerned to take action accordingly.</li> <li>➤ Total overloaded feeders are being identified in summer 2019 and bifurcation works are being carried out by the construction wing and CBD to provide quality of supply as well as reduction of Technical Losses.</li> <li>➤ It is proposed to erect additional DTRs of various capacities and DTR capacity will be enhanced during next 2 months for reducing further network losses and to improve reliability of supply.</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> |
| <p><b>Discount tariff or incentives for Energy efficient projects</b></p> <p><b>Many organizations, including government bodies are planning for energy</b></p>   | <p>A non binding MOU(Memorandum of Understanding) between the TSSPDCL, EESL, ICA India &amp; CII has been signed on 8th</p>  |

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|   | <p><b>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.</b></p> <p><b>Loss of revenue to Discoms due to implementation of energy efficient projects need to be compensated elsewhere.</b></p> | <p>September 2021 for pilot project to encouraging the TSSPDCL consumers to go with energy efficient appliances (BLDC Fans, super efficient air conditioners-SEACs, IE3 motors) as a part of DSM (Demand Side management) implementation.</p> |
| 8 | <p><b>TIME OF THE DAY TARIFF</b></p> <p><b>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.</b></p> <p><b>To handle the problem ToD tariff need to be extend for LT categories also.</b></p>  | <p>Suggestion is noted.</p>   |



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|    | <p>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> | <p>TS Discoms notes the suggestion given by the objector to link Aadhar card with Consumer services</p> |
| 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</p>        | <p>TS Discoms are preparing a scheme for installation of smart meters in a phased manner</p>            |

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|   | <p>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 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>   |                      |
| 1 | <p><b>RESEARCH AND DEVELOPMENT CENTER AT DISCOM LEVEL.</b></p> <p>1 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> | Suggestion is noted. |

181) [Devulapally Venkatesh](#), H.No.13-2-176,Devulapalli Sahithya Sadan,Warangal

| S.No | Summary of Objections / Suggestions   | Response of the Licensee  |
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| 1    | <p>(1) <b>Non-Tariff Income:</b> the Licensees can explore the possibilities of increasing NonTariff Income by:</p> <p>(a) <b>Collecting Royalty Payment</b> 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) <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.</b></p> <p>(c) <b>Further, the Licensees can examine collecting Royalty Payment from Endowments Department as in the Endowment controlled temples exorbitant charges are being collected from devotes 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.</b></p> | <p>a. The proposal for charging cable operators is already submitted to the Hon'ble TSERC for approval.</p> <p>b. Suggestion is noted.</p> <p>c. The subject doesnot pertain to Discom.</p> |

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| 2 | <p><b>Registration of applications for new connections:</b></p> <p>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.</p> <p>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>Tsspdcl facilitated consumer online registration of new service connetion through TSSPDCL web portal. It has not tied-up with mee-seva centers for this matter.</p> <p>Further, the reasons for rejection of applications can be viewed under "My 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></p> <p>The Licensees should examine the aspect of extending power supply to Domestic 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</p> | <p>Discoms are duly adhering to the regulations that are issued by the Hon'ble Commission in this regard.</p>  |

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|   | <b>consumer. If any, deviations may attract legal complications.</b>  |   |
| 4 | <p><b>Meter Readings: The Licensee may examine:</b></p> <p><b>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.</b></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></p> <p><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.</b></p> | <p>Discoms are duly adhering to the regulations that are issued by the Hon'ble Commission.</p>  |

182) [Saurobrota Dutta](#), Hemanth Sahay Associates,81/1,Adchini,Sri Aurobindo Marg,New Delhi-110017

|  | <b>Objections / Suggestions</b>  | <b>Responses</b>  |
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|  | <p>We are the counsel on behalf of Fortum Charge &amp; Drive India Pvt Ltd and intend to draw attention of the Hon'ble Telangana Electricity Regulatory Commission w.r.t. the public notice issued on 29.12.2021. 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 Requirement (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 P.M. In this regard please be informed that we have received our mandate for filing the objections/comments on 24.01.2022 and are facing difficulty of time constraint for filing the same by today. 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 31.01.2021. Kindly let us know if any further assistance is required at our end.</p> | <p>The matter is in the jurisdiction of Hon'ble Commission.</p> |

183) [V Veerappa chary](#) S/o: Ramulu, 1-101, Nagarkunta Vill, Shabad P & M, RR District – 509217, Mobile : 9949199131

| Sl.No. | Objections / Suggestions   | Responses  |
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| 1      | <p>ఒకే స్తంభం పై రెండు DTR ల లైన్లు ఉన్నవి వాటిని వైరు వేరుగా మార్చాలి రంగారెడ్డి జిల్లా షాబాద్ మండలం నాగర్ కుంట గ్రామంలో జొన్నాడ మల్లయ్య కిష్టయ్య వ్యవసాయ భూమి లో ఉన్న ఒకే స్తంభానికి రెండు DTR ల నుండి విద్యుత్ లైన్లు ఉన్నవి వేరే స్తంభం పాతి లైను మార్చాలి</p> | <p>వినియోగదారుడు. తను కొత్తగా వేసుకున్న బోరుకు పోలు పిప్టు చేయడం కోసం అభ్యర్థిస్తున్నాడు. ఇందుకు గాను వినియోగదారునికి పీప్టింగ్ ఛార్జీలు చెల్లించవలసిందిగా తెలిపాము.</p> |

184) [Kavali Darshan](#) S/O Ramchandraiah, Keesaram Vill, Shabad (M), R R District – 509217, Mobile : 9989929044

| Sl.No. | Objections / Suggestions   | Responses   |
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| 1      | <p>మండలం షాబాద్ సారం గ్రామంలో రంగారెడ్డి జిల్లా నివాసిని తూర్పు నర్సింహా రెడ్డి పొలంలో ట్రాన్స్ ఫార్మర్ నుండి హై టెన్షన్ వైర్లు క్రింద లైట్ల చల్ ఇబ్బడి తెగి పోతున్నది క్రింద పది మంటలు వ్యాపిస్తున్నాయి అట్టిదాని 4 స్తంభాల పాడువునఁ ఉన్నది మార్చగలరని నా యొక్క ప్రార్థన.</p> | <p>మీ సమస్య ను దగ్గర్లో ఉన్న సబ్ డివిజన్ లెదా సెక్షన్ ఆఫీస్ లెదా సి .ఎస్ .సి (వినియోగదారుల సేవ కేంద్రం లో) ఫిర్యాదు చెయ్యగలరు</p> |



185) [Lingala Chinnaramchandraiah](#) , J-53, Shambad M, RR District - 509217 ,Mobile : 9701281370

| Sl.No. | Objections / Suggestions   | Responses   |
|--------|--|---|
| 1      | <p>ఇంటర్ పోల్ వేయుట గురించి రంగారెడ్డి జిల్లా షాబాద్ మండలము రంగారెడ్డి గ్రామము బొనగిరిపల్లి లోని చిన్నరామ చంద్రయ్య అంగాల యొక్క భూమి సర్వే నెంబర్ 47 లో విద్యుత్ లైను ప్రమాదకరంగా కిందికి వ్రేలాడుతున్నది దయచేసి సరి చేయగలరు 5101300016 ఈ నెంబర్ గల విద్యుత్ కనెక్షన్ నాది కాదు దీనిపైనా 7000 బిల్లు అయింది ఈ మొత్తని నన్ను కట్టమని అడుగుతున్నారు దయచేసి ఈ కనెక్షన్ నా పేరు పై నుండి తొలగించగలరు.</p> | <p>మీ సమస్య ను దగ్గర్లో ఉన్న సబ్ డివిజన్ లెదా సెక్షన్ ఆఫీస్ లెదా సి .ఎస్ .సి (వినియోగదారుల సేవ కేంద్రం లో) ఫిర్యాదు చెయ్యగలరు</p> |