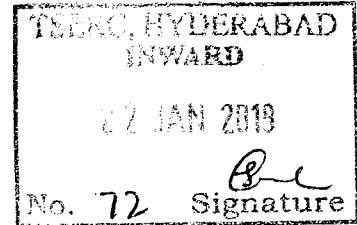


GHIAL/2018/Tech Services/12917
Date: 22nd January 2018

The Chief General Manager (IPC & RAC)
TSSPDCL,
Corporate Office,
Ground Floor, Mint Compound,
Hyderabad – 500 063 Telangana



Dear Sir,

Subject: Objections/ Suggestions on the Public Notice for ARR filed before the TSERC by TSSPDCL in respect of Retail Supply Business for FY 2018-19

With reference to your Public Notice dated 28th December 2017 filed by TSSPDCL, we M/s GMR Hyderabad International Airport Limited are hereby enclosing our objections/ suggestions in the requisite format for your kind consideration.

Yours sincerely,

For GMR Hyderabad International Airport Limited

Authorized signatory

For perusal
Secretary <i>Chalga 22/1/18</i>
Member/T
Member/F
Chairman

Copy to:

The Commission Secretary
Telangana Electricity Regulatory Commission ✓
D.No. 11-4-660, 5th Floor, Singareni Bhavan, Red Hills,
Hyderabad-500004, Telangana

Enclosed: Objections/suggestions on the ARR Filings & Tariff Proposals of TSSPDCL in prescribed format.

Name & Full Address of the Objector	Brief details of Objection (s)/ Suggestion (s)	Objections against ARR, Tariff Proposals and Cross Subsidy Surcharge & Additional Surcharge proposals of TSSPDCL	Whether copy of objection & proof of delivery at Licensee's Office enclosed (Yes/No)	Whether Objector wants to be heard in person
<p>GMR Hyderabad International Airport Limited</p>	<p>Objections of GHIAL:</p> <p>It has been proposed that the loads should be segregated between aviation activity loads and non-aviation activity loads at the Airport.</p> <p>In this regard we would like to submit that, the issue with respect to segregation of loads at the Airport was long settled by the Hon'ble Commission pursuant to the clarification given by the erstwhile APCPDCL that segregation of loads is not possible.</p> <p>The erstwhile APCPDCL had indeed contended as under before the Hon'ble Commission:</p> <p><i>(a) The entire distribution activity is done through Under Ground Cable System. Hence, it is not possible to inspect premises and identify physical source and destination of supply and load point from where it is emanating and to which loads it is feeding.</i></p> <p><i>(b) Due to Bus Coupler arrangement (Ring main arrangement), shifting of loads from non-aviation activity to aviation activity at any point of time by operating the bus couplers may take place. As such, it is not possible to monitor such instances every time as the area is vast and that too under high security zone.</i></p> <p><i>(c) Most importantly, the purpose of power for both commercial activity and aviation activity is not segregated and without any clear demarcation is not in compliance with the provisions of</i></p>	<p>Chapter 2.4 (A) (9.4) - Compliance Report to Earlier Directive</p> <p>M/s GMR International Airport is presently fed from 220/33 kV RGIA substation (4 Nos. 33 kV feeders) metering at 220 kV level. Further GMR has constructed and completed another 220/33 kV new GMR substation (12 Nos. 33 kV feeders) for catering existing and upcoming commercial, industrial category loads.</p> <p>On commissioning of the substation, the non-aviation loads of GMR Airport will be segregated and fed from new substation with a separate metering at source point and to bill under appropriate category.</p> <p>However, at present the identified and segregated non-aviation loads viz., M/s. Novotel and M/s. Amazon; are being billed under HT-II category by installing the sub-meters.</p> <p>The Cost of Supply (COS) shall be calculated based on the study of load pattern of GMR Airport service.</p>	<p>Yes</p>	<p>Yes</p>

<p>GTCS.</p> <p><i>(d) For the reasons mentioned above, it is not technically possible to segregate the loads between aviation and non-aviation activity with present arrangement.</i></p> <p>The Hon'ble State Commission considering the aforesaid observation and taking due cognizance of several other techno-legal problems that would arise pursuant to the segregation of loads have observed that <i>"if it is not feasible to have separate metering arrangements for the aviation activities and purely commercial activities, then the State Commission could re-categorize GHIAL in a separate category other than HT Commercial II and determine the composite tariff for aviation and the commercial activities by creating a new HT Category titled HT -III, Airports, Railway Stations and Bus Stations. The said arrangement has been duly implemented and followed all these years since the separate metering issue was already addressed to by the Hon'ble State Commission by creating a separate category viz., HT III category. As the said issue of segregation and separate metering has already been decided and closed, the same cannot be sought to be re-opened again by the DISCOM.</i></p> <p>For the above stated reasons, we humbly request the Hon'ble Commission to reconsider its earlier directive on segregation of loads and treat the matter as closed.</p>			
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BEFORE HON'BLE TELANGANA STATE ELECTRICITY REGULATORY COMMISSION

FILING NO:

CASE NO:

OBJECTIONS FILED BY GMR HYDERABAD INTERNATIONAL AIRPORT LIMITED ("GHIAL") WITH RESPECT TO THE FILING OF ARR APPLICATION BY SOUTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED FOR THE YEAR 2018 -19.**BACK-GROUND OF GHIAL:**

1. GHIAL has been awarded the concession by the Government of India, Ministry of Civil Aviation, to design, finance, construct, operate and maintain an international green field airport viz., Rajiv Gandhi International Airport at Shamshabad. The State Government and the Airports Authority of India are holding 13% each in the equity share capital of GHIAL. The State Government has also given on lease the land to GHIAL for the development of the Airport and other airport and non-airport activities for the socio economic development of the State. Pursuant to the concession agreement and land lease agreement, GHIAL has constructed the airport with world class amenities and is presently owning, operating and maintaining the same.
2. It has been always the endeavor of GHIAL to provide the best airport facilities to the airport users at a reasonable cost and to maintain environmental friendly eco system at the airport.

OBJECTIONS WITH REGARD TO THE SEGREGATION OF LOADS:

It has been proposed that the loads should be segregated between aviation activity loads and non-aviation activity loads at the Airport. In this regard we would like to submit that, the issue with respect to segregation of loads at the Airport was long settled by the Hon'ble Commission pursuant to the clarification given by the erstwhile APCPDCL that segregation of loads is not possible.

The APCPDCL had indeed contended as under before the Hon'ble Commission:

1. *The entire distribution activity is done through Under Ground Cable System. Hence, it is not possible to inspect premises and identify physical source and destination of supply and load point from where it is emanating and to which loads it is feeding*
2. *Due to Bus Coupler arrangement (Ring main arrangement), shifting of loads from non-aviation activity to aviation activity at any point of time by*

operating the bus couplers may take place. As such, it is not possible to monitor such instances every time as the area is vast and that too under high security zone.

- 3. Most importantly, the purpose of power for both commercial activity and aviation activity in one contiguous area without any clear demarcation is not in compliance with the provisions of GTCS.*
- 4. For the reasons mentioned above, it is not technically possible to segregate the loads between aviation and non-aviation activity with present arrangement.*

The Hon'ble State Commission considering the aforesaid observation and taking due cognizance of several other techno-legal problems that would arise pursuant to the segregation of loads have observed that *"if it is not feasible to have separate metering arrangements for the aviation activities and purely commercial activities, then the State Commission could re-categorize GHIAL in a separate category other than HT Commercial II and determine the composite tariff for aviation and the commercial activities by creating a new HT Category titled HT -III, Airports, Railway Stations and Bus Stations. The said arrangement has been duly implemented and followed all these years since the separate metering issue was already addressed to by the Hon'ble State Commission by creating a separate category viz., HT III category. As the said issue of segregation and separate metering has already been decided and closed, the same cannot be sought to be re-opened again by the DISCOM.*

For the above stated reasons, we humbly request the Hon'ble Commission to reconsider its earlier directive on segregation of loads and treat the matter as closed in the interest of justice. Further, we may be permitted to put forth our other objections during the personal hearing.

For GMR Hyderabad International Airport Limited



Authorised Signatory

GHIAL/2018/Tech Services/12917
Date: 22nd January 2018

The Chief General Manager (IPC & RAC)

TSSPDCL,
Corporate Office,
Ground Floor, Mint Compound,
Hyderabad – 500 063 Telangana

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Yours sincerely,

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<p>GMR Hyderabad International Airport Limited</p>	<p>Objections of GHIAL:</p> <p>It has been proposed that the loads should be segregated between aviation activity loads and non-aviation activity loads at the Airport.</p> <p>In this regard we would like to submit that, the issue with respect to segregation of loads at the Airport was long settled by the Hon'ble Commission pursuant to the clarification given by the erstwhile APCPDCL that segregation of loads is not possible.</p> <p>The erstwhile APCPDCL had indeed contended as under before the Hon'ble Commission:</p> <p><i>(a) The entire distribution activity is done through Under Ground Cable System. Hence, it is not possible to inspect premises and identify physical source and destination of supply and load point from where it is emanating and to which loads it is feeding.</i></p> <p><i>(b) Due to Bus Coupler arrangement (Ring main arrangement), shifting of loads from non-aviation activity to aviation activity at any point of time by operating the bus couplers may take place. As such, it is not possible to monitor such instances every time as the area is vast and that too under high security zone.</i></p> <p><i>(c) Most importantly, the purpose of power for both commercial activity and aviation activity in one contiguous area without any clear demarcation is not in compliance with the provisions of</i></p>	<p>Chapter 2.4 (A) (9.4) - Compliance Report to Earlier Directive</p> <p>M/s GMR International Airport is presently fed from 220/33 kV RGIA substation (4 Nos. 33 kV feeders) metering at 220 kV level. Further GMR has constructed and completed another 220/33 kV new GMR substation (12 Nos. 33 kV feeders) for catering existing and upcoming commercial, industrial category loads.</p> <p>On commissioning of the substation, the non-aviation loads of GMR Airport will be segregated and fed from new substation with a separate metering at source point and to bill under appropriate category.</p> <p>However, at present the identified and segregated non-aviation loads viz., M/s.Novotel and M/s.Amazon; are being billed under HT-II category by installing the sub-meters.</p> <p>The Cost of Supply (COS) shall be calculated based on the study of load pattern of GMR Airport service.</p>	<p>Yes</p>	<p>Yes</p>

<p>GTCS.</p> <p><i>(d) For the reasons mentioned above, it is not technically possible to segregate the loads between aviation and non-aviation activity with present arrangement.</i></p> <p>The Hon'ble State Commission considering the aforesaid observation and taking due cognizance of several other techno-legal problems that would arise pursuant to the segregation of loads have observed that <i>"if it is not feasible to have separate metering arrangements for the aviation activities and purely commercial activities, then the State Commission could re-categorize GHIAL in a separate category other than HT Commercial II and determine the composite tariff for aviation and the commercial activities by creating a new HT Category titled HT -III, Airports, Railway Stations and Bus Stations. The said arrangement has been duly implemented and followed all these years since the separate metering issue was already addressed to by the Hon'ble State Commission by creating a separate category viz., HT III category. As the said issue of segregation and separate metering has already been decided and closed, the same cannot be sought to be re-opened again by the DISCOM.</i></p> <p>For the above stated reasons, we humbly request the Hon'ble Commission to reconsider its earlier directive on segregation of loads and treat the matter as closed.</p>			
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