



SOUTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED

From
The Chief General Manager (RAC),
TSSPDCL, Corporate Office,
6-1-50, Mint Compound,
Hyderabad – 500 063.

To The Secretary, TSERC, 11-4-660, 5th Floor, Singareni Bhavan, Red Hills, Hyderabad – 500 004.

Lr. No.CGM(RAC)/ADE(RAC)/AE1(RAC)/F.A/99/D.No.512/22, Dt: 24-12-2022.

Sir,

Sub:- Additional information on ARR and Tariff Filings FY 2023-24 - Information submission - Reg.

Ref:- Lr.No.TSERC/Secy/JD(TE)/DE/T-01/22-23/D.No701/Dt:09-12-2022.

It is to submit that, the Hon'ble Commission vide reference cited has directed to furnish the additional information on ARR and Tariff Proposals of Retail Supply Business filed by TSSPDCL for FY2023-24.

In this regard, Licensee is herewith submitting the above Information as Part1 in 6 sets and annexures related to the above information will be mailed in soft copies to secy@tserc.gov.in.

Encl: As stated above

yours faithfully,

Chief General Manager (RAC)

Additional Information on Aggregate Revenue Requirement (ARR) and Filing of Proposed Tariffs (FPT) for Retail Supply Business of TSSPDCL for FY 2023-24

I. Sales Forecast:

- 1. TSSPDCL to submit monthly slab-wise, Category wise sales from FY 2016-17 to 2022-23 in excel format.
- **Reply**: Monthly slab-wise, Category wise sales from FY 2016-17 to 2022-23 of TSSPDCL are enclosed in **Annexure-I**.
- 2. TSSPDCL to submit actual category wise, voltage wise connected load/contracted load, number of consumers from FY 2016-17 to2017-18 in excel format.
- Reply: Actual category wise, voltage wise connected load/contracted load, number of consumers from FY 2016-17 to 2017-18 of TSSPDCL are enclosed in Annexure-II(A) & II(B).
- 3. TSSPDCL to justify the higher growth rates of (i) 20.63% for HT-I at 132 kV, 22.83% for HT II at 11 kV, 44.43% at HT-III at 11 kV, 20% HT-IV (B) at 33 kV, 28.75% for temporary supply at 11 kV, 20.31% HT-IV (A) at 132 kV and 18.38% for HT-VI at 33 kV for projection of sales for second half of 2022-23 and (ii) 14.35% for HT-II at 11 kV,16.74% for temporary supply at 11 kV and18.38% for HT-VI at 33 kV for projection of sales for 2023-24.

Reply: The growth rates are considered in view of the new applications received and past trends in sales in those categories.

The justification for the growth rates for H2 of FY 2022-23 is mentioned in below table

S.No.	Particular	Growth rate	Justification
1	HT-I (132 kV)	20.63%	• Considered 2 year CAGR from FY19-20 to FY21-22 (in the last 1 year growth of 41.60% is witnessed)
2	HT–II (11 kV)	22.83 %	Considered 1 year CAGR from FY20-21 to FY21-22
3	HT-III , (11 kV)	44.43%	Considered 1 year CAGR from FY20-21 to FY21-22
4	HT-IV B (33 kV)	20%	Considered 1 year CAGR from FY20-21 to FY21-22 (2 year CAGR is also close to 20%)
5	Temporary supply (11 kV)	28.75%	Considered 5 year CAGR from FY16-17 to FY21-22
6	HT-IVA (132 kV)	20.31%	Considered 1 year CAGR from FY20-21 to FY21-22
7	HT-VI (33 kV)	18.38%	Considered 18.51% i.e., 5 year CAGR from FY16-17 to FY21-22

The justification for the growth rates for FY 2023-24 is mentioned in below table

S.No.	Particular	Growth rate	Justification
1	HT–II (11 kV)	14.35 %	• Considered 50% of the 1 year CAGR (2 year CAGR is 25.73% and 1 year CAGR is 28.7%)
2	Temporary supply 11 kV	16.74%	• Considered 3 year CAGR (2 year CAGR is 30.8% and 1 year CAGR is 29.88%)
3	HT-VI (33 kV)	18.38%	• Considered 5 year CAGR (2 year CAGR is 19.42% and 1 year CAGR is 21.96%)

- (4) TSSPDCL has stated in the filings that agriculture consumption would fall down from the level recorded in 2021-22 due to fall in use of bore wells and rise in canal based cultivation. TSSPDCL to submit the justification along with statistical data for projecting lesser agriculture sales for 2023-24 compared to 2021-22& 2022-23.
- Reply: The actual agriculture sales in H1 of FY 2021-22 is 5410 Mus and the actual agriculture sales in H1 of FY 2022-23 is 5105 Mus which is around 6% reduction in actual sales. Moreover the LIS sales for FY 2023-24 are projected at 105% increase (Considering only 50% of load as received from I&CAD department) which would increase canal based cultivation. Hence TSSPDCL has projected lesser agriculture sales for FY 2023-24 at -4% growth rate.
- (5) TSSPDCL has projected sales of 1821.45 MU and 3786.40 MU for HT-IV (A) Lift Irrigation at 132 KV level for 2022-23 and 2023-24 with a growth rate of more than 100%. In the sales forecast write up it is stated that 50% load factor is considered for projection as per the information provided by ICAD department.
 - (i) TSSPDCL to submit the information provided by the ICAD department along with details of load factor considered, number of pumping days, number of hours of operation for each lift irrigation pump mentioning their pump capacities.

Reply: The information provided by the ICAD department is enclosed in Annexure III

(ii) TSSPDCL is to submit the actual load factor details for FY 2021-22 and FY 2022-23 for each lift irrigation pump.

Reply: The information is enclosed in Annexure IV

(iii) Details of LIs in following format may be submitted:

Name of LIs	1	Contracted Maximum Demand in MW	Sales in MWh						
and Pumping Station			16- 17	17- 18	18- 19	19- 20	20- 21	21-22	22- 23 H1

Reply: The information is enclosed in Annexure IV.

II. Power Purchase details:

(1) TSSPDCL to submit source wise station wise details of PPAs/PUAs/PSAs in the below format in MS-excel

SI. No	Name of the Generating Station	CoD	PPAs/PUAs/PSAs date	PPAs/PUAs/PSAs approval date	Term of PPAs/PUAs/PSAs	

Reply: The information is enclosed in Annexure A

(2) TSSPDCL is to submit the details of the maintenance schedules given by the TSGENCO and CGS Stations for FY 2023-24.

Reply: The maintenance schedules of TSGENCO and CGS stations for FY 2023-24 are enclosed in Annexure V.

(3) TSSPDCL to submit the month wise Design Energy (ex-bus) for each of the contracted hydro generating stations (in MS Excel).

Reply: the month wise Design Energy (ex-bus) for each of the contracted hydro generating stations are enclosed in **Annexure-V** (A).

(4) TSSPDCL to submit the month wise energy availability (in MU) for each of the contracted generating stations under NCE sources for the period from FY 2016-17 to FY 2022-23 (in MS Excel).

Reply: The month wise energy availability (in MU) for each of the contracted generating stations under NCE sources for the period from FY 2016-17 to FY 2022-23 is enclosed in **Annexure VI(A) & VI(B)**.

(5) TSSPDCL to submit the supporting documents to substantiate the energy availability projected from each of the generating stations for FY 2022-23.

Reply: The information is enclosed in Annexure VII

(6) CSPDCL has maintained the lower availabilities of 19% and 31% for FY 2021-22 and FY 2022-23. Reasons for lesser energy availability from CSPDCL, details of fixed charges claimed, payment made by Discoms and action initiated against CSPDCL as per the provisions of PPA, if any regarding lower availabilities may be submitted.

Reply:

- The actual Power Purchased by TSDISCOMs from CSPDCL for FY 2021-22 is 1631 MU (availability of 19%). For H1 of FY 2022-23 the actual Power Purchased is zero from CSPDCL due to the reasons mentioned below. However for H2 of FY 2022-23 the estimated power purchase from CSPDCL is 2713 MU (under the assumption that the disputes will be resolved by then). Hence for the FY 2022-23 the overall Power purchase is estimated at 2713MU (availability of 31%).
- The Availability declared by CSPDCL to TSDISCOMs for FY 2020-21 is 39.67% with Fixed Charges claim of Rs.828.13Crores, for FY 2021-22 is 19.71% with Fixed Charges claim of Rs. 394.98Crores.
- However, letters are being addressed to CSPDCL every month regarding uneven and irregular scheduling of power along with discrepancies noticed in the invoices i.e. requesting

not to claim Trading Margin as mutually agreed between the parties during the meeting held on 14.02.2017 and not to claim other incidental charges till the finalization of the appeal No. 391/2018 filed by TSDISCOMs at APTEL against CSERC order on determination of Capital Cost of Marwa TPP and final consent to PPA and tariff by TSERC.

- A High level meeting has been conducted on 4th and 5th October 2021 at Vidyut Soudha, with CSPDCL to resolve the issue of outstanding dues for the Power supplied, wherein TSDISCOMS informed that necessary measures are being taken up to clear the undisputed dues (i.e. scheduled energy at provisional tariff of Rs.3.90/Kwh as per TSERC interim order dt.31.03.2017) in phased manner.
- It was also informed by TSDISCOMs during the meeting that, the outstanding amount is different as per CSPDCL and TSDISCOMs. The same needs to be clarified and reconciled subject to outcome of the Appeal filed by TSDISCOMs before Hon'ble APTEL/TSERC.
- CSPDCL vide invoice dt.23.09.2022 claimed Rs. 3576.89 Crs pending upto 03.06.2022 to consider under LPS Rule 2022 in order to schedule the 1000 MW contracted capacity to TSDISCOMs.
- TSDISCOMs vide letter dt.11.10.2022 informed CSPDCL that,Rs.2100 Crores of dues have been considered by TSDISCOMs under LPS rules-2022 (i.e., Scheduled energy @ Rs.3.90 per unit and its associated surcharge as on 03.06.2022) and is arrived as per the discussions during the joint meeting held on 05.10.2021.
- Further informed that, revolving LC for Rs.23.60 Crores with a maximum drawal limit of Rs.117.09 Crores valid upto 01.03.2023 has been opened by TSDISCOMs and the other incidental charges, as agreed by TSDISCOMs during the meeting held on 05.10.2021 will be reconciled after the adjudication of the appeal before APTEL.
- As the entire undisputed outstanding amount along with surcharge has been covered by TSDISCOMs under the LPS- Rules 2022, CSPDCL was requested to resume scheduling of 1000MW contracted capacity to TSDISCOMs immediately, as curtailing the contracted capacity is causing uncertainty in Telangana State Grid operation apart from rendering huge financial loss by way of additional market purchases and by way of payment of POC charges to CTU for the full Contracted Capacity.
- ▶ But, CSPDCL still Scheduling Zero energy to TSDISCOMs.

(7) TSSPDCL has considered the fixed cost of Rs.601 Cr. for Yadadri Thermal Power Station. The basis for considering the fixed cost to be submitted.

Reply: Considered the fixed cost of Rs.601 Cr. for Yadadri Thermal Power Station. The basis for considering the fixed cost is as below:

	CODs (communicated by TSPCC)		Annual FC	Monthly FC	
Unit	Month	No of months	INR Cr.	INR Crs/month	
1	Dec'23	4.0	401	100.2	
2	Feb'23	2.0	200	100.2	
3		0.0	0		
4		0.0	0		
5		0.0	0		
	Total	6.0	601		

- (8) TSSPDCL has considered Rs 1379 Cr towards interest on pension bonds for TSGENCO as against Rs 1255 Cr as approved in TSGENCO MYT order. Explain the reasons for considering Rs 1379 Cr.
- **Reply**: TSERC has approved 1323.39 Crs & 55.58 Crs towards interest on pension bonds and water charges respectively in TSGENCO MYT order for FY2023-24, whereas the same was projected as 1379 Crs towards interest on pension bonds in ARR filings for FY2023-24 by TS DISCOMs which includes amount towards water charges also.
- (9) Submit the details of month wise actual variable cost paid to each generator of TSGENCO and CGS thermal stations for FY 2022-23 H1.
- **Reply**: The details of month wise actual variable cost paid to each generator of TSGENCO and CGS thermal stations for FY 2022-23 H1 is enclosed in the **Annexure VIII**.
- (10) TSSPDCL to submit the copies of tariff orders issued by CERC for the contracted CGS for the Control Period from FY 2019-20 to FY 2023-24. If the tariff order for the Control Period from FY 2019-20 to FY 2023-24 is yet to be issued for any of the generating station, the tariff order issued for the Control Period from FY 2014-15 to FY 2018-19 may be submitted.
- Reply: The tariff order issued for the Control Period from FY 2014-15 to FY 2018-19 are enclosed in Annexure IX
- (11) TSSPDCL to submit the MS Excel workings of Merit Order Dispatch and the power purchase cost projections for FY 2023-24.
- **Reply**: The Merit Order Dispatch and the power purchase cost projections for FY 2023-24 is enclosed in Annexure X.
- (12) Submit the details of running of Srisailam & Nagarjuna Sagar hydel station under pump mode including the capacity of plant, no. of hours and energy utilized for running under pump mode. The details of power purchase cost incurred to run the plant under pump mode and avoided power purchase cost when it is under run generation may be submitted for 2021-22 and 2022-23 H1.

Reply: Will be complied

- (13) (i) TSSPDCL to submit the break-up of PGCIL (POC) charges, PGCIL (non-POC) charges and SRLDC fees & charges.
- **Reply**: The break-up of PGCIL (POC) charges, PGCIL (non-POC) charges and SRLDC fees & charges is enclosed in **Annexure-XI** (A).
 - (ii)TSSPDCL to submit the supporting documents to substantiate the claimed PGCIL (POC) charges, PGCIL (non-POC) charges and SRLDC fees & charges.
- **Reply**: The supporting documents to substantiate the claimed PGCIL (POC) charges, PGCIL (non-POC) charges and SRLDC fees & charges is enclosed in **Annexure-XI(B)**.
- (14) TSSPDCL to submit the month wise details of quantum of sale of surplus energy and the corresponding revenue for the period from FY 2016-17 to FY 2022-23.
- **Reply:** The month wise details of quantum of sale of surplus energy and the corresponding revenue for the period from FY 2016-17 to FY 2022-23 are enclosed in **Annexure XII.**

III. Cost of Service (CoS) for FY 2023-24:

(1) TSSPDCL to submit the supporting documents to substantiate the category wise and voltage wise class load factors and class coincidence factors considered for computing CoS for FY 2023-24.

Reply: The category wise and voltage wise class load factors and class coincidence factors considered for computing CoS for FY 2023-24 are enclosed in **Annexure-XIII**.

IV. Revenue Projections for FY 2023-24:

- (1) In sec 5.3.2 at Page 66 of TSSPDCL filings, the revenue from additional surcharge is shown as Rs.102.23 Cr for the OA sales of 602 MU for FY 2023-24 at an additional surcharge rate of Rs 1.38 per unit. Whereas, the DISCOMs had requested to fix the additional surcharge as Rs 9.86 per unit in the petition filed for determination of AS for H1 of 2023-24. TSSPDCL to submit justification for considering the additional surcharge as Rs 1.38 per unit for 2023-24.
 - **Reply**:TSSPDCL has claimed Additional surcharge of Rs. 6.81 per unit for 370.34 MU for H2 of FY 2022-23 but the Hon'ble TSERC has approved only Rs. 1.38 per unit as Additional Surcharge. Hence, the TS Discoms have considered the approved Additional Surcharge of Rs. 1.38 per unit for FY 2023-24 to arrive at the revenue from Additional Surcharge.
- (2) Revenue from cross subsidy surcharge and additional surcharge to be considered based on projections made for FY 2023-24. TSSPDCL to submit justification for not considering the projected values for CSS for FY 2023-24 in the filings.

Reply: TSSPDCL have considered the projected values for CSS for FY 2023-24 in the filings.

(3) Submit the details of number of services, connected load/CMD, annual consumption and revenue of LT & HT services of wholly religious places for FY 2021-22 and H1 of FY 2022-23.

Reply: Will be complied.

(4) Submit the details of number of services, connected load/CMD, consumption and revenue of transformer repairs/servicing centers for FY 2021-22 & H1 of 2022-23. TSSPDCL to indicate the category under which the transformer repairing centres are being billed.

Reply: Will be complied.

(5) Submit the details of number of services, connected load/CMD, consumption and revenue of Mission Bhagiratha services for FY 2021-22 & H1 of 2022-23. TSSPDCL to indicate the category under which the Mission Bhagiratha services are being billed.

Reply: Will be complied.

(6) TSSPDCL to submit the item wise details of non-tariff income for retail supply business for the period from FY 2016-17 to FY 2017-18.

Reply: The item wise details of non-tariff income for retail supply business for the period from FY 2016-17 to FY 2017-18 is enclosed in **Annexure XIV**.

(7) TSSPDCL to submit the MS Excel workings of Cross Subsidy Surcharge (CSS) claimed for FY 2023-24.

Reply: The CSS workings are enclosed in Annexure XV.

V. Retail Supply Formats:

- (1) Form 1.4:
 - (i) TSSPDCL has not shown the capacities of BTPS U-3, U4, KTPS VIII and YTPS in Form 1.4 for FY 2023-24.
 - (ii) Availability, Dispatch and Fixed Charges are filled for Ramagiri Wind Plant in Form 1.4 for FY 2023-24. Plant capacity is not shown.
 - (iii) There is no name of generating station but shown availability and Dispatch of 2.37 MU and fixed charges of Rs 8.02 Crs have been shown.
 - (iv) Plant capacities of Neyveli plants, NCE-Bundled power Coal, Telangana STPP, Thermal Power Tech-I &II, NCE Plants not submitted.
 - (v) Availability and Dispatch values not shown for CSPDCL
 - (vi) Availability and Dispatch values not shown for Singareni Thermal Power Plant.

Hence TSSPDCL to re-submit the revised Format 1.4 rectifying the above mentioned errors.

Reply: The above RSF Formats are enclosed in Annexure XVI.

(2) The Form 1.4 C(Discom-Discom Purchases) is empty. TSSPDCL is to re-submit the form 1.4 C for FY 2023-24.

Reply: The above RSF Formats are enclosed in Annexure XVI.

(3) Form 4.1, Gross Energy Availability sheet and Form 4.2 Energy Despatch sheet for FY 2023-24 are not submitted. TSSPDCL is to submit the Form 4.1 and Form 4.2 for 2023-24.

Reply: The above RSF Formats are enclosed in Annexure XVI

(4) The values in Net Revenue and the Total Revenue columns of the LT Categories in Form - 7(Total Revenue at current Tariffs and charges) are abnormal. TSSPDCL is to resubmit the Form-7.

Reply: The above RSF Formats are enclosed in Annexure XVI

(5) Transmission Contracts values not entered in Form-5 of COS Formats. TSSPDCL is to submit the completely filled up Form-5 of COS Formats.

Reply: : The above CoS Formats are enclosed in Annexure XVII

(6) Total Commercial losses, Total energy losses and Total Demand losses and Total transmission losses not entered in Form-6 of COS Formats. TSSPDCL is to submit the completely filled up Form-6 of COS Formats.

Reply: The above CoS Formats are enclosed in Annexure XVII

(7) Cost allocation percentages not entered in Form-7 of COS Formats. TSSPDCL is to submit the completely filled up Form-7 of COS Formats.

Reply: The above CoS Formats are enclosed in Annexure XVII.

VI. Compliance to directives:

(1) TSSPDCL to submit the compliance status of directive no. 4 i.e. segregation of loads in Airport, of earlier directives of Appendix-B in RST Order for FY 2023-24.

Reply: Will be complied.

- (2) TSSPDCL to submit the latest status and correspondence with REC for sanction of loan for 100% Agl DTR metering.
- Reply: It is to submit that a Scheme is formulated for an amount of Rs.93 Crores for implementation of Agriculture DTR Metering. The Scheme is submitted to M/s REC for financial assistance as loan vide Lr.No.CGM(P)/SE(P)/DE(RE)/F.SA:PEC Sceme/D.No.602,dt.22.07.2022.so far no response in this regard has been received from M/s.REC. After receiving approval for sanction of loan from REC, the directive of Hon'ble Commission will be implemented. The reports submitted to the Hon'ble commission vide Lr.No. CGM (RAC)/ SE(RAC)/DE(RAC)/F.C29/D.No.427/2022, Dated:16.11.2022.
 - (3) The Commission has directed the DISCOMs to actively pursue the matter with APGENCO/APTRANSCO for availing the State share in Machkund PH and Tungabhadra PH. TSSPDCL to submit the latest status and correspondence with APGENCO/APTRANSCO for availing the share in Machkund PH and Tungabhadra PH.
 - Reply: As per the Executive Director, Commercial, TSPCC, Vidyuth Soudha Hyderabad-82 vide Lr.No.ED(Comml) / SE(Comml) / DE(STPP&Co-orn)/D.No.30,Dt:20.07.2022. The issue is continuously pursued with M/s. APGENCO for extension of PPA and scheduling of power from Machkund PH and Tungabadra PH. The report is submitted to the Hon'ble Commission vide Lr.No. CGM (RAC)/ SE(RAC)/ DE(RAC) /F.C29/ D.No.217/2022, Dated: 29.07.2022.
 - (4) TSSPDCL to submit the details of consumer awareness programs conducted in high AT&C loss areas.

Reply: Will be complied