



NBV/FIN/ 530 /2022-23  
January 31, 2022

**NAVA LIMITED**

(Formerly Nava Bharat Ventures Ltd.)

Corp. Office: Silicon House, No. 8-3-318/1, Plot 78,  
Road No. 14, Banjara Hills, Hyderabad - 500 034, Telangana, India.

**The Secretary,  
Telangana State Electricity Regulatory Commission  
5<sup>th</sup> Floor, Singareni Bhavan, Red Hills,  
Hyderabad- 500 004**

Dear Sir,

Sub: Proposal of TS DISCOMs for determination of Grid Support charges for parallel operation of CPPs for the FY 2023-24 and your Notice for inviting Comments and Suggestions thereon- Submission of our objections -Reg..

Ref: TS DISCOMS ARR filing dated 30.11.2022 and Public Notice dated 21.12.2022.

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With reference to the above-mentioned subject, we are herewith submitting our objections in the matter of ARR filed by TSNPDCL and TSSPDCL for determination of Grid Support charges for parallel operation of Captive power generating plants in Telangana.

We request the Hon'ble Commission to provide us the opportunity and permit us to submit further submission during the course of public hearing on 22.02.2023 and 24.02.2023 or as determined by the Hon'ble Commission either by us/our representative and our legal counsel, details as furnished below.

1. Mr. GRK Prasad,  
E-mail: [grkprasad@nbv.in](mailto:grkprasad@nbv.in) and [psrinivas@nbv.in](mailto:psrinivas@nbv.in)  
Contact No. 9849029429, 9848699935
2. Mr. Challa Gunaranjan,  
CKR Associates,  
Advocates and Legal Advisors  
E-mail: [cgr@ckrassociates.in](mailto:cgr@ckrassociates.in)  
Contact No. 9849503922

Thanking you,

**Yours faithfully,  
For Nava Limited** (Formerly Nava Bharat Ventures Limited)

**GRK Prasad  
Executive Director**

Encl: As above

Copy to : 1. The Chief General Manager, (IPC& RAC) , TSNPDCL, Warangal.  
2. The Chief General Manager, (IPC&RAC), TSSPDCL, Mint compound,  
Hyderabad



Name & Full Address of the Objector alongwith email ID & Contact Number	Brief Details of objections/suggestions of TSSPDCL & TSNPDCL	Whether the copy of the objections and proof of delivery at Licensees' office enclosed	Whether the objector wants to be heard in person
<p><b>Nava Limited,</b> (Formerly Nava Bharat Ventures Limited) #6-3-1109/1, Nava Bharath Chambers, Raj Bhavan Road, Somajiguda, Hyderabad, Telangana - 500 082.</p> <p>Represented by its Executive Director, Sri.GRK Prasad., Phone Number: 9849029429</p>	<p>The Objections are in relation to the proposed levy of Grid Support Charges by the Licensees.</p> <ul style="list-style-type: none"> <li>a) There is no jurisdiction to levy GSC.</li> <li>b) The Applicant DISCOMs have no right to propose or levy GSC.</li> <li>c) There is no justification for levy of GSC.</li> <li>d) There is no revenue/cost shown against the proposed levy and the same is unjust enrichment of the Discoms at the cost of generators.</li> <li>e) There is no justification for the proposed rate of GSC and is arbitrary and excessive or why there is differentiation between generators.</li> <li>f) There is no justification for levy of GSC on all generators.</li> <li>g) CPPs are beneficial to the operation of the Grid and the proposed levy heavily disincentivises CPPs and generation as a whole.</li> </ul>	<p>Yes. Proof of delivery enclosed.</p>	<p>Yes. The Objector wishes to be heard in person.</p>

**BEFORE THE HONOURABLE TELANGANA STATE ELECTRICITY  
REGULATORY COMMISSION**

AT ITS OFFICE AT V TH FLOOR, SINGARENI BHAVAN,  
RED HILLS, HYDERABAD

**O. P. No. 80 of 2022**

**AND**

**O.P.No.81 of 2022**

**In the matter of:** Determination of the Aggregate Revenue Requirement (ARR) for Retail Supply Business for the year FY 2023-24 under Section 62 of the Electricity Act, 2003.

**In the matter of:**

**Southern Power Distribution Company of Telangana Ltd., &**

**Northern Power Distribution Company of Telangana Ltd.**

**...Applicants**

And

**Nava Limited,**

#6-3-1109/1, Nava Bharath Chambers,

Raj Bhavan Road, Somajiguda, Hyderabad, Telangana - 500 082.

Having its Unit at:

Palwancha, Bhadradri Kothagudem District,

Telangana-507154.

**...Objector**

**OBJECTIONS FOR THE PROPOSAL OF GRID SUPPORT CHARGES FOR FY 2023-24**

While filing the Tariff Proposals (ARR) for FY 2023-24, the Distribution Licensees in Telangana have proposed, inter alia, a levy of Grid Support Charges on all the power generating plants in Telangana for parallel operation with Grid as mentioned below.

1. The licensees in the tariff filings for FY 2022-23 have proposed to levy Grid Support Charges on the Captive consumers in their area, for the alleged benefits they were availing during their parallel operation with the licensees' grid network. The licensees had requested the Hon'ble Commission to consider the



methodology adopted in the APERC Order dated 08.02.2002 and subsequently upheld by Supreme Court via judgment dated 29.11.2019 as below:

*“Persons operating Captive Power Plants (CPPs) in parallel with T.S. Grid have to pay ‘Grid Support Charges’ for FY 2022-23 on the difference between the capacity of CPP in kVA and the contracted Maximum Demand in kVA with Licensee and all other sources of supply, at a rate equal to 50% of the prevailing demand charge for HT Consumers. In case of CPPs exporting firm power to TSTRANSCO, the capacity, which is dedicated to such export, will also be additionally subtracted from the CPP capacity”.*

2. Regarding the above proposal, the Hon’ble Commission, in the Retail Supply Tariff Order for FY 2022-23 dated 23.03.2022 in O.P.Nos.58 & 59 of 2021 has referred the matter to the Grid Coordination Committee (constituted in accordance with Clause 5.1 of the Regulation No. 4 of 2018). The relevant extracts of the Hon’ble Commission’s ruling in the RSTO for FY 2022-23 is as follows:

*“6.25.6 In accordance with Clause 5.1 of the Regulation No.4 of 2018, a Grid Coordination Committee has been constituted with representation from wide spectrum of generating companies, transmission licensees, distribution licensees, electricity traders, OA consumers etc. Clause 5.2(v) of the Regulation No. 4 of 2018 specifies that “the Grid Coordination Committee shall be responsible for such matters as may be directed by the Commission from time to time”. The Commission finds it appropriate to refer the matter to the Grid Coordination Committee for a detailed study on the issue of parallel operation of CPPs and consequent levy of GSC.”*

3. In line with the Hon’ble Commission’s ruling, the Grid Coordination Committee has initiated the detailed study on the matter of parallel operation of CPPs and consequent levy of GSC, however, admittedly, the proposal for levy of GSC for FY 2022-23 has not attained finality as on date.
4. The 3<sup>rd</sup> meeting of the Grid Coordination Committee (GCC) was held on 16.07.2022 on study on the issue of parallel operation of CPPs and consequent levy of Grid Support Charges(GSC). As a member of the GCC, on behalf of Captive Power generating plants, the Objector herein had submitted its written submissions to The Chairperson, GCC, under a copy to this Hon’ble Commission that grid support charges are not at all required to be collected from CPPs in the state of Telangana and requested the DISCOMS to withdraw the proposal.
5. **The Applicant Licensees now propose to levy Grid Support Charges for FY 2023-24 on all the generators (Captive Generating Plants, Cogeneration Plants, Third party Generation units, Merchant Power Generation units, Rooftop Power Plants etc.) who are not having PPA/having PPA for partial capacity with the licensees as follows:**



*Grid Support Charges = Total Installed Capacity X Rate of GSC  
(Rs./kW/month) Rate of GSC:*

- i. The parallel operation/grid support charges are to be applied to the total installed capacity of the generators connected to the Grid.*
- ii. Conventional generators shall pay Rs. 50 per kW per month.*
- iii. Renewable energy plants including waste heat recovery plants, the plants based on municipal solid waste, and the co-gen plants shall pay Rs.25 kW per month.*
- iv. Rooftop solar plants under net metering/gross metering policy shall pay Rs.15 per kW per month.*
- v. Co-gen sugar mills shall pay charges of Rs. 25 per kW per month, for a period of 4 months or actual operation period, whichever is higher.*
- vi. These charges shall not be applicable when the plants are under shutdown for any reason and when such shutdown period exceeds two months.*
- vii. To the extent of PPA capacities of the generators with the DISCOMs shall be exempted from payment of these charges.*

6. In the above matter, this Hon'ble Telangana Commission has invited the stakeholders to file their comments/suggestions/objection, if any, on or before 31.01.2023.

7. The Objector runs a 114 MW captive co-gen thermal power plant with WHRS plant in its premises. Excess power generated over and above the Objector's requirement is exported to grid

**Our objections against the proposed Grid Support Charges are set out below for this Hon'ble Commission's kind consideration and disposal:**

#### **I. HISTORY OF GRID SUPPORT CHARGES (GSC):**

1. Grid Support Charges (GSC) were 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) and 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.



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.
3. It is also 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.

## **II. THE IMPACT OF THE ELECTRICITY ACT, 2003:**

1. In 2003, the Electricity Act, 2003 ("Act") came into force. The Act brought in substantial changes to the previous regime, including the establishment of State Commissions, delicensing of Generation, unbundling of transmission and distribution, specification of tariffs and charges, crystallized the scheme of Open Access, brought in procedures and standards to enforce discipline, etc. However, it left the Commissions established by States under earlier State enactments (such as the AP Electricity Reform Act, 1998) untouched and treated them to be Commissions established under the Act, essentially conferring them with powers under both Acts, in as much as the State enactments were not in derogation to the Act.
2. Open Access was introduced under Section 42 of the Act, in pursuance to which APERC Regulation Nos.2 of 2005 and 2 of 2006 were also promulgated by the erstwhile Commission.

### **No jurisdiction to Propose or Levy GSC:**

3. Under the provisions of the Act, separate entities, being the 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 at all.
4. The Applicant DISCOMs are responsible for their distribution business only and can at most levy wheeling charges, and nothing more. Any GSC as sought to be levied would have to be proposed and substantiated by TSSLDC, being the entity tasked with grid security under the Act. Therefore, DISCOMs have nothing to do with GSC. The ARR of the Applicant DISCOMs Distribution Business is recovered through wheeling charges as approved in the relevant MYT orders. As the present the ARR and the FPT is to recover the costs of the Applicants' Retail Supply Business, and the Applicant DISCOMs have no role in proposing GSC, and certainly not at 132 KV voltage.



5. It is also pertinent to note that this Hon'ble Commission is constituted under the Act, and thus the earlier AP Electricity Reform Act, 1998 under which GSC were earlier determined is neither applicable nor relevant in the present day. The Act, 2003 specifically lays down the charges and tariffs to be collected, and no charges beyond what is prescribed can be levied. Admittedly, there is no charge such as GSC mentioned in the Act or the regulations, let alone under S.62 under which the present petitions are filed, and as such, any such proposal to levy GSC is without jurisdiction.
6. It is thus submitted that the scope of present ARR for Retail Supply Business for FY 2023-24 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 Applicant DISCOMs to levy GSC is **itself misconceived and patently without jurisdiction.**

**Without Prejudice to above submissions of the very authority and jurisdiction to levy GSC, the following further submissions are made.**

**In relation to the Proposal made by the Applicant Discoms:**

7. The Applicant Discoms have proposed Grid Support Charges for all generators, including captive, cogeneration, merchant power plants/IPPs, rooftop power plants etc., which is completely against the reasoning of GSC in the first place.
8. The Applicant Discoms have arbitrarily and without any substantiation proposed different rates of GSC for different types of generators. There is no reason stated as to why or on what basis such differentiation is made.
9. There is no justification at all for how rates of GSC have been arrived at. The proposed levy has no basis and is grossly excessive, arbitrary, and so requires to be rejected.
10. There is no mention of basis and methodology by DISCOMS for the proposed GSC of Rs.50 KW per Month. 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.
11. The proposed levy of GSC appears to be lifted from the Hon'ble APERC's RSTO for FY 2022-23, which levy itself has been stayed by the Hon'ble APTEL vide order dated 20.05.2022 in DFR No.186/2022, and orders dated 01.07.2022 in DFR Nos.240/2022, 241/2022 and 271/2022.
12. There is no revenue or costs that are shown to be associated corresponding to the levy of GSC. As such, once the entire costs are recovered by the proposed RST



alone, any further levy of GSC amounts to illegal and unjust enrichment of the Applicant Discoms at the cost of generating companies.

**In relation to Captive Power Plants:**

13. 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:”

*“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.”*

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.

14. In the case of CPPs availing Open Access for transmission and wheeling of power from the generation point to the consumption point, charges are levied as determined by the regulator from to time. Even in these cases there is an established mechanism of UI charges which essentially address the so-called grid support or parallel operation. The proposed levy by the TSDISCOMs is therefore quite arbitrary, excessive and is not supported by quantifiable data.
15. 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. In relation to CPPs it is also submitted as follows:
- a. CPPs absorb some amount of harmonics whereas a consumer without CPP inject full quantum of harmonics generated to the grid.
  - b. The unbalanced voltage of the grid is a source of negative phase sequence current which is absorbed by the generators of CPP.
  - c. 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





- d. 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.
- e. 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.
- f. Due to injection of power by CPPs the load on the transformers in the grid reduces resulting in less transformer loss.
- g. The CPP are acting as distributed generator at the load center for which the transmission and distribution loss has been reduced to great extent.
- h. 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.
- i. There is no provision in the statute that empowers the DISCOMS to levy Grid Support Charges on the CPPs. They, on the other hand are benefited as CPPs absorbed some amount of harmonics. On the contrary consumer without CPPs transmit full quantum of harmonics to the grid. The DISCOMS/TRANSCO is not taking any step to install suitable equipment to filter the harmonics and injecting those pollutants to the grid for which the CPPs are forced to suffer. The grid voltage is always unbalanced due to various categories of consumers and hence is a source of negative phase sequence current which cause stress on the generators of CPPs.
- j. 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:

i) Para- 15 of Order:

*"We heard the parties at length and also perused the technical report submitted by OPTCL. The present installed capacity of the CGPs in the State as submitted by OPTCL is 5173 MW which is more than or equal to capacity of other generators connected to Odisha Grid*



*including Odisha share of power from Central Generation Stations. We agree with the contention of CCPPO that the pollutants of the Grid like fluctuations in frequency and voltage, negative phase sequence, distortion due to harmonics etc. are the resultant effect of all synchronous machines like generators and motors of the Grid system. These pollutants are injected in to the grid not only by CGPs but also by other independent generators and machines like motors and arc furnaces of the consumers. Holding industry having CGPs only responsible for this is not correct”.*

ii) Para-16 of Order:

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

iii) Para- 17 of Order:

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

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.

- k. 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.



- l. 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.
- m. The levy of GSC in 1999 was proposed when the generation shortfall was prevailing, and the TSDISCOMS were going through occasional R&C periods and frequency fluctuations, etc. when the Regulator considered that the proposed levy had merits. However, the TS Grid has since improved / made many strides in Grid size, availability of power and attained stability and is one of the few Grids in the country being engaged in export of power on a steady basis. Aggregate capacity of the CPPs now is relatively marginal compared to the Grid Size and no real forbearance could be possible warranting such huge and arbitrary levy.
- n. 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.
- o. 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. It may 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. Similarly The Hon'ble OERC has also appointed an independent third party for system study before determination of GSC.
- q. 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.



## PRAYER

That, in view of the above, we pray that the Hon'ble Commission may be graciously pleased to

- a) reject the proposal levy of Grid Support Charges as there is no such provision in the Statute/Electricity Act, whereas the STU /Transmission and Distribution Licensees are duty bound under Section 39 and 40 of the Electricity Act, 2003 and the National Electricity Policy, 2005 to provide connectivity to the CPPs like any generating station;
- 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;
- c) To hold the levy till the third-party analysis is completed to the satisfaction of the Hon'ble TSERC;
- d) To permit us to submit further submission, if any, on such an independent study for consideration of the Hon'ble Commission either during the course of public hearing or separately
- e) 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;
- f) 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.

**For Nava Limited**  
(Formerly Nava Bharat Ventures Ltd)



**GRK Prasad**  
**Executive Director**

Place: Hyderabad:  
Date: 31.01.2023



## Sriram Kumar C

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**From:** Srinivas Pasala  
**Sent:** 31 January 2023 14:10  
**To:** Sriram Kumar C  
**Subject:** FW: Proposal of TS DISCOMs for determination of Grid Support charges vide ARR submitted for the FY 2023-24 -Submission of our objections -Reg  
**Attachments:** Filing of Objections of Nava Limited against DISCOM's proposal of Grid Support Charges for the FY 2023-24.pdf

**From:** Srinivas Pasala  
**Sent:** 31 January 2023 14:07  
**To:** 'secy@tserc.gov.in' <secy@tserc.gov.in>; 'cgmir@tsnpdcl.in' <cgmir@tsnpdcl.in>; 'cgmfin@tsnpdcl.in' <cgmfin@tsnpdcl.in>; 'seipc@tssouthernpower.com' <seipc@tssouthernpower.com>; 'cgmcomml@tssouthernpower.com' <cgmcomml@tssouthernpower.com>  
**Subject:** Proposal of TS DISCOMs for determination of Grid Support charges vide ARR submitted for the FY 2023-24 - Submission of our objections -Reg

Dear Sir,

Sub: Submission of our objections against the ARR filed by the TS DISCOMS for the FY 2023-24 -Reg.

With reference to the TS DISCOMS proposal for determination of Grid Support Charges for the FY 2023-24, please find the attached file for our details of objections.

We request the Hon'ble Commission/TSNPDC/TSSPDC to provide the opportunity and permit us to submit further submission during the course of public hearing on 22.02.2023 and 24.02.2023 or as determined by the Hon'ble Commission either by us/our representative and our legal counsel, details as furnished in the attached filing and also as mentioned below.

1. Mr. GRK Prasad,  
E-mail: [grkprasad@nbv.in](mailto:grkprasad@nbv.in) and [psrinivas@nbv.in](mailto:psrinivas@nbv.in)  
Contact No. 9849029429, 9848699935

2. Mr. Challa Gunaranjan,  
CKR Associates,  
Advocates and Legal Advisors  
E-mail: [cgr@ckrassociates.in](mailto:cgr@ckrassociates.in)  
Contact 9849503922

Thanking you,

Yours truly,  
Srinivas P  
General Manager -Commercial  
**Nava Limited**  
(Formerly Nava Bharat Ventures Limited)  
Corporate Office, Hyderabad  
Contact: 9848699935