

NORTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED



**REPLIES TO
THE OBJECTIONS / SUGGESTIONS RAISED ON ARR & FPT FOR
RETAIL SUPPLY BUSINESS INCLUDING CROSS SUBSIDY
SURCHARGE FOR FY 2023-24 & POWER PURCHASE TRUE-UP
FROM FY 2016-17 TO 2022-23(PROV)FOR RETAIL SUPPLY
BUSINESS**

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16	Sri. Komireddy Anjanna, H.No.7-31, Lingapur Village, Kamareddy Mandal , Kamareddy District	
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18	Sri. K. Jaswant Reddy, H.No.11-1-78/2, Bharat Nagar, Siddipet District	
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20	Sri. P. Ramakrishna Reddy, H.No.4-86, Gollapalle Village, Kondapur Mandal, Sangareddy district.	
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Replies to the Objections/Suggestions raised on ARR & FPT for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 by Sri M. Venugopal Rao, Senior Journalist & Convener, Centre for Power Studies, H.No.1-100mp/101 Monarch Prestige, Journalist's Colony, Serilingampally Mandal, Hyderabad -500032 (Set-1)

S.No.	Summary of Objections / Suggestions	Response of the Licensee																
1.	<p>WHAT DO THE TS DISCOMS PROPOSE TO BRIDGE THE PROJECTED REVENUE GAP? : The two TS DISCOMs have shown their revenue requirement, revenue at current tariffs (including non-tariff income), tariff proposals and revenue gap (in Rs.crore) for the year 2023-24, after adjusting the estimated revenue from non-tariff income, cross subsidy surcharge and grid support charges, as shown hereunder:</p> <table border="1" data-bbox="220 649 1163 868"> <thead> <tr> <th>DISCOM</th> <th>ARR</th> <th>Revenue at current tariff</th> <th>Revenue gap</th> </tr> </thead> <tbody> <tr> <td>TSSPDCL</td> <td>36963</td> <td>33521.34</td> <td>3211.00</td> </tr> <tr> <td>TSNPDCL</td> <td>17096</td> <td>9737.70</td> <td>7324.00</td> </tr> <tr> <td>Total</td> <td>53059</td> <td>43259.04</td> <td>10535.00</td> </tr> </tbody> </table> <p>While the DISCOMs have not given the financial impact of tariffs proposed for LT & HT wholly religious places, green tariff, parallel operation charges/grid support charges, etc., the proposal of the DISCOMs not to hike tariffs for all other categories of consumers is welcome. At the same time, the DISCOMs have shown a revenue gap of Rs.10535 crores - Rs.3211 crores by SPDCL and Rs.7324 crores by NPDCL - without any proposals and explanation as to how do they bridge it. It is the responsibility of the DISCOMs to explain as to how they propose to bridge the projected revenue gap for the next financial year, as a part of meeting regulatory requirements. Experience confirms that the DISCOMs are submitting their ARR and tariff proposals annually, after getting nod from the GoTS. Therefore, both the GoTS and the DISCOMs must have prior</p>	DISCOM	ARR	Revenue at current tariff	Revenue gap	TSSPDCL	36963	33521.34	3211.00	TSNPDCL	17096	9737.70	7324.00	Total	53059	43259.04	10535.00	<p>For the FY 2022-23, TSERC approved INR 7912.88 Crs towards Subsidy from GoTS to TS Discoms (INR 1610.89 Crs to TSSPDCL and INR 6301.99 Crs to TSNPDCL) to bridge the revenue deficit of the Discoms.</p> <p>For FY 2023-24, TS Discoms have claimed a revenue gap of INR 10,535 Crs and are expecting to meet the revenue deficit through the financial support of Government of Telangana State through subsidy.</p>
DISCOM	ARR	Revenue at current tariff	Revenue gap															
TSSPDCL	36963	33521.34	3211.00															
TSNPDCL	17096	9737.70	7324.00															
Total	53059	43259.04	10535.00															

	understanding on how to bridge the projected revenue gap.	
2.	<p>FACTORS THAT NEED TO BE TAKEN INTO ACCOUNT BEFORE FINALISING RSTO TO AVOID TRUE-UP BURDENS LATER: Due to various factors that may come into play after Retail Supply Tariff Order (RSTO) is issued or are not taken into consideration before and at the time of finalising RSTO, revenue gap of the DISCOMs in the FY 2023-24, as has been the experience over the years, may turn out to be more or less than what the Hon'ble Commission determines, depending on the nature and impact of such factors. The additional revenue gap, if any, will crop up and the DISCOMs would claim the same under true-up/true-down later. Experience is confirming that the amounts being claimed for true-up are turning out to be several times higher than the total impact of annual tariff hike, except the abnormal hike of Rs.6078.73 crore for the year 2022-23. We request the Hon'ble Commission to take into consideration the following factors also while determining revenue requirement and revenue gap of the DISCOMs and finalising RSTO:</p>	<p>TS Discoms have already considered various factors that may come into play and based on them the projections are arrived. TS Discoms will be implementing the FCA regulations in Telangana which enables them to recover/refund the variation in power purchase costs without much delay.</p>
2 a.	<p>2.a.</p> <p>If the subsidy the GoTS is agreeing to provide is not sufficient to bridge the determined revenue gap of the DISCOMs, after taking all relevant factors and impact of the proposed tariffs into account, we request the Hon'ble Commission not to treat the balance revenue gap as a regulatory asset. It is for the DISCOMs to propose how they would bridge that balance revenue gap. In view of their proposals, there would be no justification in requesting for and treating the balance revenue gap as a regulatory asset to be recovered from the consumers in future. Moreover, there has been no instance of treating revenue gap as a regulatory asset for any FY since the inception of TSERC.</p>	<p>However, TS Discoms have calculated the revenue gap using the actual data available (till H2 of FY 2022-23) and projections (H2 of FY 2022-23 and FY 2023-24) to the best of their knowledge. As mentioned above, TS Discoms are expecting the GoTS to provide subsidy to bridge the gap.</p> <p>TS Discoms shall abide by the directions given by the Hon'ble Commission, and the subsidy commitments by the GoTS.</p>

2.b	<p>2.b.</p> <p>We once again request the Hon'ble Commission to get the commitment of the GoTS on providing subsidy in a legally binding manner. Also, it should be made clear to the GoTS that, when true-up claims come up for the FY 2023-24, it should provide additional subsidy proportionately to the fully subsidised consumers, i.e., the additional cost incurred by the DISCOMs for supply of power as determined in the RSTO plus full additional cost incurred for purchasing and supplying additional power exceeding the quantum determined by the Commission in the RSTO. Also, GoTS should provide additional subsidy required for supply of power made to partly subsidised consumers also. These should be made an integral part of the commitment of GoTS for providing subsidy in a legally binding manner. The DISCOMs have not revealed whether there are any dues of subsidy from the GoTS pending. The pending dues, if any, of subsidy doubly emphasize the need for getting a legally binding commitment from the GoTS for providing subsidy. In view of the compulsion of the DISCOMs to go in for borrowing additional working capital or other loans, they may be constrained to claim interest thereon for a considerably longer period under true-up or else, they have to bear that amount thereby incurring losses or decrease in their permissible profits. If such interest burdens are allowed by the Commission under true-up, the consumers will be penalised for their no fault, but for the failure of the GoTS in honouring its commitment to provide agreed subsidy in time. Therefore, we request the Hon'ble Commission to stipulate in a legally binding manner that, if the GoTS fails to provide the committed subsidy for the FY concerned in time, it should pay interest thereon for the delayed period in tune with the interest the DISCOMs have to pay for additional borrowings arising as a result of the said failure of the GoTS. We request the Hon'ble Commission not to direct the DISCOMs to collect charges as per cost of service from the</p>	<p>The details of the subsidy approved and received by TSNPDCL is furnished hereunder:</p> <table border="1" data-bbox="1176 300 1942 495"> <thead> <tr> <th>Financial Year</th> <th>Subsidy approved</th> <th>Subsidy recieved</th> </tr> </thead> <tbody> <tr> <td>*2021-22</td> <td>4254.14</td> <td>4254.14</td> </tr> <tr> <td>2022-23 (Upto Dec-22)</td> <td>4726.49</td> <td>4145.96</td> </tr> </tbody> </table> <p>*Note: Tariff Subsidy approved for F.Y.2021-22 is taken as per Tariff order 2018-19. However, The Government of Telangana State is paying 100% of tariff subsidy regularly.</p>	Financial Year	Subsidy approved	Subsidy recieved	*2021-22	4254.14	4254.14	2022-23 (Upto Dec-22)	4726.49	4145.96
Financial Year	Subsidy approved	Subsidy recieved									
*2021-22	4254.14	4254.14									
2022-23 (Upto Dec-22)	4726.49	4145.96									

	<p>consumers concerned, if GoTS fails to provide a part of subsidy it committed to provide in a FY, as it did in the past. Such an approach of the Commission shows lack of sanctity to the commitment given by GoTS and its unenforceability.</p>	
	<p>2.c.</p> <p>Apart from the huge revenue gap, the DISCOMs have shown availability of net surplus power to the tune of 13441 MU for the year 2023-24, after inter-DISCOM transfer of power, against the projected requirement of 83113 MU. We request the Hon'ble Commission not to determine the surplus power to be sold and the likely revenue that would accrue on account of such sale to the DISCOMs for the purpose of determining revenue requirement and revenue gap of the DISCOMs. Determining surplus power to be sold by the DISCOMs and the rate at which it is to be sold and adjusting the estimated revenue from the proposed sale of surplus power from the total power purchase cost may lead to revenue gap, need for tariff hike or subsidy from the GoTS, or both, coming down proportionately. Needless to say, sale of surplus power by the DISCOMs depends on market trends, not on the directions of the SERCs. Surplus power, as per merit order dispatch, is always with higher variable cost. Being must-run units, purchases from hydel, NCE and RE units and thermal units with lowest variable costs as per merit order should be made and that power has to be supplied to the consumers, not sold in the market as surplus power. Selling costly surplus power at lower than the purchase price, naturally, leads to loss. For the reasons of "commercial principles," if the DISCOMs cannot sell surplus power profitably, or at least, without loss, in the FY concerned, the estimated revenue from sale of surplus power will not accrue to the DISCOMs. If the estimates of surplus power to be sold and revenue that would accrue to the DISCOMs therefrom turn out to be</p>	<p>Merit Order is being followed for scheduling of power on daily basis. The availability of surplus power (as shown in the ARR) is not constant. It is annual consolidated figure, considering energy from all sources. Depending on the load dynamics, there appears surplus power in certain blocks in a day. Also, there is deficit in certain other time blocks in a day. As such, TSDISCOMs are bound to purchase power from open market during power deficit time blocks to cope up with the demand and opt for sale of power during surplus times.</p> <p>Any surplus power available in any 15 minutes time Block will be traded in Exchange only after making a comparison whether the prevailing Exchange price is higher than the variable cost of Thermal plants. All efforts are being made to sell the surplus power through Exchanges in a most effective way so as to earn some revenue to TSDISCOMs resulting in reduction of some financial burden on TSDISCOMs and the consumers in turn.</p> <p>The average power purchase cost per unit of FY-2022-23 is inclusive of all the generators including must run plants such as Solar, Wind, Nuclear etc., whereas the power sold through Power Exchanges is mainly from Thermal Plants. Further, the power was sold in certain time blocks in a day/months through Exchanges depending on market rates at that time. Hence, both the rates cannot be compared. TSDISCOMs/TSPCC is selling the power in a most optimistic way and the average rate of power sold in Exchange for</p>

<p>realistic and are materialised for the FY concerned, there would be no problem. If the same turn out to be unrealistic and are not materialised, fully or partly, for the FY concerned, it will have complications. Such unrealistic determination/estimation, in the first place, gives the false impression that need for tariff hike or subsidy from the GoTS, or both, is avoided proportionately by reducing the estimated revenue on sale of surplus power from the revenue requirement of the DISCOMs for the FY concerned, at the time of finalising and issuing the RSTO, but, in practice, it will crop up in the form of revenue gap and true-up claims for the same FY later. Such unrealistic determination/estimate, even if not intentional, leads to consequences which are in the nature of miscalculations. If non-realisation of the estimated revenue from sale of surplus power by the DISCOMs is treated as “uncontrollable” and allowed to be imposed on the consumers under true-up, there will be no accountability and responsibility on the part of those who determined sale of surplus power and those who failed to sell the same. When such determination/estimation is made and taken into account in the RSTO concerned, it should be considered as a “controllable” factor. Experience has confirmed repeatedly that determination of the quantum of surplus power to be sold and revenue that would accrue on account of the same in advance is unrealistic, because ever fluctuating market conditions cannot be determined in advance and the costs of surplus power with higher variable components are relatively higher. As such, sale of surplus power is always in the realm of speculation. The Hon'ble Commission has directed the DISCOMs that, "the DISCOMs have not projected any revenue from sale of surplus power for FY 2022-23 and submitted that the cost of such additional purchases is expected to be higher than the revenue from sale of surplus energy. The DISCOMs have submitted the month wise details of quantum of energy sold along with corresponding tariffs for the period from FY 2015-16 to FY</p>	<p>FY 2022-23 (Upto January 2023) is Rs.5.70/Kwh.</p> <p>TS Discoms have considered the energy availabilities for FY 2023-24, as per the projections shared by the respective generating station and energy requirement as per the estimated sales projections, and approved loss levels.</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 2023-24 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 2016-17 to FY 2022-23, have already been submitted to the Hon'ble Commission, as part of the Additional information requested.</p>
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	<p>2021-22. Based on the analysis of the same, the Commission has considered the tariff of Rs.3.20/kwh for sale of surplus energy. Accordingly, the revenue from sale of surplus energy has been adjusted from the total power purchase cost" (page 131 of RSTO for FY 2022-23). Accordingly, for the year 2022-23, the Hon'ble Commission has considered a sale of surplus power of 5059.81 MU and accrual of revenue thereon as Rs.1691.14 crore. Against the determined average cost of power purchase per unit for 2022-23 of Rs.4.49, selling surplus power @ Rs.3.20 per unit results in a loss of Rs.1.29 per unit or Rs.652.71 crore on sale of 5059.81 MU. Since surplus power is with higher variable costs, the lost on account of selling it @ Rs.3.20 per unit will be much more. For the year 2022-23, SPDCL has shown sale of surplus energy of 1181 MU at a variable cost of Rs.805 crore, while NPDCL has shown sale of surplus energy of 493 MU at a variable cost of Rs.336 crore. For the year 2023-24, the DISCOMs have not proposed any sale of surplus power; they have submitted that 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 power."</p>	
<p>2.d.</p>	<p>The estimated availability of surplus power to the tune of 13441 MU for the FY 2023-24, if materialised, would entail its backing down and paying hefty fixed charges therefor. For working out revenue requirement and revenue gap of the DISCOMs for the FY concerned, fixed costs that need to be paid for backing down thermal power, which is shown as surplus power available as per applicable PLF/CUF of the plants concerned under PPAs in force, should also be taken into account. Let it be worked out and shown separately for the FY 2023-24. Otherwise, such expenditure for paying fixed costs for deemed generation would be shown as additional revenue gap later and the DISCOMs would claim it under true-up to be collected</p>	<p>TS Discoms shall abide by the instructions of the Hon'ble Commission for submission of any additional information, as required.</p> <p>The comparison of percentage change in fixed costs with the percentage change in power quantum is not correct. If the comparison is done for a single generating station, then the proportion can be justified whereas the objector has been comparing the total quantum which will have all the generating stations (including the ones with higher fixed costs), hence the</p>

<p>from consumers.</p> <p>The DISCOMs have to explain whether the fixed costs shown by them for the quantum of power to be generated at threshold level of PLF of the plants concerned, or for the quantum of power purchase shown in their submissions for 2023-24. While the quantum of purchase as revised for FY 2022-23 is shown as 53415 MU, fixed cost paid is shown as Rs.8895 crore by SPDCL. The same for the FY 2023-24 is shown as 59020 MU and fixed charges as Rs.12023 crore, respectively. While quantum of power purchase increased by 10.49%, the fixed cost of power purchase increased 35.17%. Similarly, NPDCL has shown quantum of power purchase for 2022-23 as 20662 MU and fixed costs as Rs.3702 crore. For 2023-24, it has projected the same as 24093 MU and Rs.5019 crore, respectively. While the quantum of power purchased increased by 16.60%, the fixed cost of power purchase increased by 35.57%. Dispatch of thermal power for both the DISCOMs from TS Genco increases from 24664 MU for 2022-23 to 29321 MU for 2023-24, and fixed cost increases from Rs.1212 crore to Rs.1671 crore, i.e., increases by 18.8% and 37.87%, respectively. Similarly, despatch from CGS stations shows increase from 16856 MU to 23279 MU, and fixed charges increase from Rs.2156 crore to Rs.3986 crore, i.e., increases of 38% and 84.88%, respectively, for the same periods. The DISCOMs have simply stated that they have taken “the projections as provided by the respective stations” for fixed costs. Compared to increase in quantum of power, what are the reasons for such abnormal increases in fixed costs? Moreover, backing down of thermal power stations should not exceed the number of backing down orders and generation capacity as incorporated in the PPAs of the plants concerned for technical reasons or Grid code. Accordingly, after limits of backing down thermal power stations are exhausted, if surplus power is still available, the turn of NCE/RE units would come for backing down, of course, without paying</p>	<p>direct comparison of percentage changes is not the right way of analysis in this situation.</p> <p>However, there has been increase in fixed costs due to addition of new generating stations.</p> <p>The availability of surplus power (as shown in the ARR) is not constant. It is annual consolidated figure, considering energy from all sources. Depending on the load dynamics, there appears surplus power in certain blocks in a day. Also, there is deficit in certain other time blocks in a day. As such, TSDISCOMs are bound to purchase power from open market during power deficit time blocks to cope up with the demand and opt for sale of power during surplus times. It may be noted that all the RE projects with which DISCOMs have signed Power Purchase Agreements, are must run stations as per the direction of MoP, Gol.</p>
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	<p>fixed charges therefor as per the terms and conditions in their PPAs. If such a situation arises, we request the Hon'ble Commission to direct the DISCOMs to back down NCE/RE units starting with units having highest tariff in the descending order.</p>	
<p>2.e.</p>	<p>The Hon'ble Commission has approved energy availability of 82492.57 MU, requirement of 78274.05 MU and energy surplus of 4218.15 MU for the FY 2022-23. However, the DISCOMs have shown revised estimates of availability of 79222 MU, requirement of 74076 MU and surplus of 5146 MU for the FY 2022-23. What would be the availability of surplus power by the end of the current financial year is yet to be seen.</p>	<p>During the H1 of FY 2022-23, the state has witnessed good rainfall which eventually reduced the demand from Agriculture and LIS categories. The month-wise actual sales for each category have already been provided by the discoms and from these figures it is evident that there has been reduction in demand in first half of FY 2022-23. Since the demand is reduced, the surplus quantum has increased.</p>
<p>2.f.</p>	<p>The DISCOMs have been purchasing power through power exchanges and open market as and when they consider it necessary to meet demand. Sometimes, it is taking place by backing down thermal power in order to purchase must-run renewable energy under PPAs in force, imposing dual burdens on the consumers in the form of paying higher tariffs for renewable/non-conventional energy and in order to purchase the must-run power, backing down thermal power and paying fixed charges therefor, i.e., for power which is neither generated, nor purchased, nor supplied, nor consumed. Such anarchic situation is arising as a result of hasty and imprudent policies and directions being imposed on the States and SERCs by the GoI, decisions taken, approved and implemented for purchasing unwarranted renewable energy which cannot meet peak demand, daily or seasonal. There are several absurdities that are taking place under the reform process being thrust in the power sector by the GoI, RPPO and must-run status to NCE/RE units being part of such</p>	<p>The State DISCOMs are entrusted with the dual responsibility of not only to adhere to the various regulations/orders issued by TSERC/ CERC/MNRE/MoP but also the bigger mandate enlisted in the Electricity Act 2003, to maintain reliable power supply with least cost principle. As such to meet the growing demand of the state of Telangana and to ensure 24 Hrs uninterrupted power supply to all categories of consumers including agricultural services as per the directions of Govt of Telangana State, TSDISCOMs have been planning for procurement of power. DISCOMs have been entering into Long-term, Medium-term and Short-term power purchase agreements based on the growing demands of the State and to meet the additional demand of the Lift Irrigation Projects taken up by the State Govt. It may be noted that all the RE projects with which DISCOMs have signed Power Purchase Agreements, are must run stations as per the direction of MoP, GoI. The present procurement of Solar power through Central Agencies like SECI/NTPC/ NHPC at competitive tariffs will not only help DISCOMs to meet the power</p>

absurdities. Treating variations in power purchase costs that take place as a result of entering into PPAs indiscriminately and consents given to the same, without carefully considering fluctuating demand curve and need to maintain harmonious power mix to suit the same to the extent practicable, as “uncontrollable” means taking imprudent decisions, entering into questionable PPAs and giving consents to the same as unquestionable, without any responsibility and accountability on the part of the authorities concerned at the central and state level for their questionable actions and inactions. It is nothing but treating controllable factors as “uncontrollable,” leading to imposition of unjust and avoidable burdens on the consumers of power under true-up claims, thereby penalising them for their no fault. Regulating power purchases in a prudent manner is within the purview of the Hon'ble Commission as a part of its regulatory process by giving or rejecting consents to power purchase agreements by taking a holistic view of demand, availability of power under PPAs in force at threshold levels of PLF/CUF, power to be available from power plants of TS GENCO under execution, RPPO, scope for availability of power from other sources at relatively lower tariffs, need for determining minimum percentage of renewable power to be purchased by the DISCOMs under RPPO prudently, if the system of RPPO is not dispensed with, need for addition of generation capacity periodically in tune with fluctuating and growing demand for power, ideal power mix to the extent practicable to be in tune with demand curve, periodical review and appropriate modification required of load forecast and procurement plans, prudent practices to be adopted by the DISCOMs to purchase power through real competitive biddings, leaving no scope for manipulations in terms and conditions of bids, dispensing with the system of determining generic tariffs for non-conventional and renewable energy, availability of some surplus and need for purchasing power from exchanges and market at the same time for a

requirements of the State but also enable to bring down the average power purchase cost, while complying with the Renewable Power Purchase Obligation targets fixed 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 44 Amendment to the section 142 of the Electricity Act 2003, which proposes for imposing penalties (ranging from Rs. 0.25/kWh to Rs. 2.00/kWh) for non-compliance of RPPO targets, it is required that the TS Discoms shall be prepared to meet the larger RPPO targets in phased manner, that may be imposed in future by MOP, Gol on all the states, including the state of Telangana.

MNR E RPPO Targets	2022- 23	2023- 24	2024- 25	2025- 26	2026- 27	2027- 28	2028- 29	2029- 30
Wind	0.81	1.60	2.46	3.36	4.29	5.23	6.16	6.94
Hydro includi ng PSP	0.35	0.66	1.08	1.48	1.80	2.15	2.51	2.82
Others	23.44	24.81	26.37	28.17	29.86	31.43	32.69	33.57
Total RPPO target	24.60	27.07	29.91	33.01	35.95	38.81	41.36	43.33

(source:
https://powermin.gov.in/sites/default/files/webform/notices/Renewable_Purchase_Obligation_and_Energy_Storage_Obligation_Trajectory_till_2029_30.pdf)

	<p>very limited time due to inherent limitations in generation capacities and meeting peak demand with those generation capacities, etc. There are several other issues that need to be rationalised and modified to ensure reasonable avoidance of additional burdens on the consumers which fall within the policy approaches of the central and state governments and regulations and practice of the regulatory commissions.</p>	
<p>2.g.</p>	<p>The Hon'ble Commission has been issuing annual retail supply tariff orders wherein availability and requirement of power for different categories of consumers during the financial year concerned are being estimated after considering the projections made by the DISCOMS in their applications and submissions of the objectors. In practice, availability and the quantum of sale of power determined accordingly may turn out to be more or less depending on fluctuating generation and requirement of power by consumers at large. When demand exceeds availability of power determined by the Commission, the DISCOMS resort to purchase of additional power from the exchanges and market to the extent required. For making such additional purchases of power, the Hon'ble Commission has been determining an upper limit of cost per kwh in its annual retail supply tariff order. It is because, in the name of ensuring uninterrupted supply of power, the DISCOMS are not allowed to purchase power at any cost and any time and impose unjust and unwarranted burdens on the consumers by paying exorbitant costs for purchasing additional power. For the FY 2022-23, the DISCOMS have shown short-term market purchases of 5159 MU and payment of variable costs of Rs.2989 crore. For the year 2022-23, the Hon'ble Commission has not shown any requirement of purchase of power on short-term basis in the market. On the other hand, the Hon'ble Commission has taken into account sale of surplus power to</p>	<p>The availability of surplus power (as shown in the ARR) is not constant. It is annual consolidated figure, considering energy from all sources. Depending on the load dynamics, there appears surplus power in certain blocks in a day time. Also, there is deficit in certain other time blocks in a day. As such, TSDISCOMs are bound to purchase power from open market during power deficit time blocks to cope up with the demand and opt for sale of power during surplus times.</p> <p>The reasons for revised estimate of availability of surplus for FY 2022-23 has already been submitted in above sections (section 2.e). Discoms have procured only 3616 MU through short term purchases during FY 2022-23, the objector's claim of 5159 MU is not correct. The surplus power estimated for FY 2022-23 is 5146 MU which is including the energy sold by TS Discoms during H1 of FY 2022-23.</p> <p>There are no purchases from short-term bilaterals (like PTC, etc.) during FY 2022-23 and FY 2023-24. Discoms purchased from exchange market only during the time-blocks when there is deficit in power requirement. Since the whole process of purchasing power from exchange is transparent, the Discoms need not seek prior approval from Hon'ble Commission. Due to shortage of coal during the H1 of FY 2022-23, the market rates were higher.</p> <p>Discoms have already provided the actual monthwise short-term</p>

<p>the tune of 5059.81 MU and accrual of variable costs revenue therefrom of Rs.1619.14 crore. But, both the DISCOMs have shown sale of surplus power for 2022-23 as 2410 MU and accrual of variable costs revenue therefrom of Rs.1395 crore. On the one hand, the DISCOMs have shown revised estimate of availability of surplus to the tune of 5146 MU and short-term purchases of 5159 MU for 2022-23, on the other hand. Is the revised estimate of surplus power inclusive of power sold outside? Why this dichotomy and imbalance? Since the Hon'ble Commission has not approved any short-term purchases for the year 2022-23 and fixed upper limit of price for such purchases, have the DISCOMs taken prior permission of the Commission for short-term purchases and the upper limit of price at which such purchases are to be made? They have shown the average variable cost per unit of Rs.7.07 for short-term purchases during 2022-23. What is the quantum of thermal power backed down during 2022-23 and the fixed costs paid therefor? What are the tariffs at which the DISCOMs have purchased power under short-term arrangement, month-wise and source-wise per unit? What is the revenue accrued, including fixed charges, on sale of surplus power by the DISCOMs per unit?</p>	<p>power purchased and the actual sale of power during H1 of FY 2022-23 through exchanges in the prescribed RSF formats.</p>
<p>2.h.</p> <p>If it is to ensure due compliance with the power for all 24x7 policy of the Ministry of Power, GoI, in which state governments, including GoTS, continue to participate, in all fairness, the additional expenditure incurred by the DISCOMs to purchase power in the market for the said purpose should be provided by the MoP, GoI, and GoTS to the DISCOMs. Elementary common sense, in the light of the pro-corporate and anti-people policies of the Modi government and as a result the innumerable burdens being imposed on the people at large, severely affecting their purchasing power and living standards, tells us that the policy of power for</p>	<p>The objections/ suggestions in section 2.h are directed towards Government of India and CIL. TS Discoms cannot comment on the intentions/ ideologies of GOI and CIL.</p>

all continuously, though apparently projected to meet demand of the consumers, is really intended to serve interests of generators and traders of power who sell their power in the market.

The Gol is simply not bothered about capacity of consumers to pay for such high-cost power, how should the DISCOMs ensure implementation of the said policy of power for all continuously, who should bear the additional heavy burdens of cost of such power purchases, whether such purchases should be made at any cost and any time for the said purpose, to what extent its failures of commission and omission like failure to ensure supply of fuels like coal and natural gas allocated by it to the power plants concerned and regulation of their prices, imposition of obligations on the DISCOMs under the outdated RPPO, etc. Because of the failure of the Gol in ensuring supply of coal as per allocations made by it to thermal power plants in the country, there has been artificial scarcity for coal and underutilisation of generation capacities of thermal power plants, leading to scarcity for power. The Gol compelled Coal India Limited to import coal to supply it to the thermal power plants and forced the States to take the same. As a result, cost of power in the market escalated to as high as Rs.20 or even more for kwh, and generation of thermal power using high-cost imported coal, fully or partly, led to increase in the cost of such thermal power. This is despite CIL and other coal companies having surplus funds, technology and manpower and copious deposits of coal to produce required coal, on the one hand, and auctioning coal for a premium, on the other. Creating artificial scarcity for indigenous coal, leading to scarcity for power in the country, and in the name of overcoming such a problem created by itself, the Modi government forced import of coal, thereby serving the interests of sellers of power in the market, on the one hand, and of coal companies owned by Indian corporate houses like Adani group abroad, and imposed avoidable hefty burdens on the consumers of power

The cap-rate for procurement of short term power through Power Exchanges was reduced by CERC from Rs. 20/kWh to Rs. 12/kWh to control the prices during shortage of coal (CERC - Directions by the Commission to the Power Exchanges registered under the Power Market Regulations, 2021 – dated 22.12.2022)

in the country. Having imported coal, which is not its business, CIL has been saddled with the same unable to shift it from ports, unable to find takers for it, it is widely reported. Later, the Gol withdrew its order in the month of August, 2022, for import of coal, after serving the interests of Indian corporate houses by giving them orders through the CIL for importing coal from their coal mines abroad. It is also widely reported that, even while forcing the state governments to use imported coal for generation of power in their thermal plants, the Modi government did not direct private corporate houses like Adani and Tata to use imported coal in their thermal power plants at Mundhra in Gujarat. A lot has been discussed and reported widely in the media on these issues. It is these deliberate failures of commission and omission of the Modi government that have led to abnormal hike in prices of power in the market and of thermal power generated using imported coal, imposing hefty burdens on consumers of power. With its incorrigible anti-people and pro-corporate policy approaches and practice, the Modi government is adamantly refusing to take responsibility for the same and compensate the states to avoid the additional burdens being imposed on the consumers of power as a result of its failures of commission and omission. GoTS should demand the Gol to reimburse the additional burdens imposed on the state as a result of the failure of the latter in ensuring supply of fuels as allocated by it to power plants from which TS DISCOMs have been getting power under PPAs in force and purchase power generated with a mix of imported coal and short-term purchases in the market at higher prices. The Ministry of Power, Gol, is reported to have issued a notification dated 9.1.2023, directing the GENCOs to import coal for blending up to 6% of their requirement till September, 2023 to cover any shortages in the local supply of the fuel. With the Modi government re-enacting the drama of scarcity of coal in the country and forcing the states and CGSs to import coal for

	generation of power, additional burdens under variable costs would be imposed on consumers for the FY 2023-24 also. The projections of costs of power purchase made by TS DISCOMs for the year 2023-24 in the subject petitions are likely to change.	
3.	WHAT IS THE NEED FOR PURCHASING SHORT-TERM POWER?: Despite projecting availability of power to the tune of 96554 MU, with a surplus of 13441 MU, the DISCOMs have proposed to purchase 136 MU with a total variable cost of Rs.61 crore under short-term for the year 2023-24. The average variable cost per unit of short-term purchases is shown as Rs.4.53. What is the need for purchasing this additional power on short-term basis? The DISCOMs have not shown month-wise surplus/deficit for the year 2023-24.	The station-wise availability for each month received from respective stations and the Commissioning dates of new stations are considered to derive the availability of power quantum in each month and based on the sales projections, the demands for each month are derived. The difference between the requirement and availability will be considered as surplus or deficit. Eventhough the licensees are in surplus for FY 2023-24, in the month the April, the requirement is exceeding the availability by 136 MUs which is considered to be met with short term purchase
4.	BURDENS ON ACCOUNT OF PURCHASING UNWARRANTED RENEWABLE ENERGY : The DISCOMs have projected availability of non-conventional energy/renewable energy to the tune of 11,960 MU for the FY 2023-24 which works out to 18.99% of the projected sales of power of 62970.74 MU. If projected availability of hydel power of 5415 MU also is taken into account, the total NCE/RE works out to 17375 MU which is 27.59% of the projected sales. As per RRPO regulation No.7 of 2022, the DISCOMs are mandated to purchase a minimum of solar and non-solar RE/NCE of 9.25% for 2023-24, 10.50 % for 2024-25, 11.75% for 2025-26 and 13% for 2026-27. What will the DISCOMs do with the unwarranted must-run RE, which cannot meet peak demand, far exceeding the minimum targets under RPPO? Fixing targets of minimum percentage of RE to be purchased by the DISCOMs year-wise, irrespective of its requirement, and meeting the targets is one thing, and far exceeding the targets is quite another, leading to availability of more surplus power and need for backing down thermal	DISCOMs have been entering into Long-term, Medium-term and Short-term power purchase agreements based on the growing demands of the State and to meet the additional demand of the Lift Irrigation Projects taken up by the State Govt. Further, DISCOMs have to ensure 24Hr reliable power supply to all the categories of the consumers in the state, including the Agricultural consumers, for which DISCOMs plan the power purchases. The loads have become more dynamic in nature due to 24 Hour power supply to Agricultural consumers and Lift Irrigation Projects loads. In respect of the power purchases, whether it is through agreements or through markets, DISCOMs are ensuring a balance to the extent possible, for ensuring the grid stability and other required technical parameters. Further, while entering the PPAs for purchase of RE power, DISCOMs are also bound to examine the RPPO targets in vogue both at State level & National level. It may be noted that Govt of

power and paying fixed charges there for in order to purchase must-run and unwarranted RE. To be in consonance with the fluctuating demand curve, adding required RE to supplement base-load thermal power is the ideal option. The DISCOMs have argued that, “with the growing demands of the State (estimated at 8-9% growth rate), TSDISCOMs would not be able to meet the RPPO targets fixed by State ERC, if additional RE power is not added” (page 13 of the Commission’s order dated 26.10.2022 issued in O.P.No.69 of 2022). Are the DISCOMs purchasing RE just to meet the RPPO targets fixed by the Commission or to meet demand for power ensuring an ideal power mix to be in consonance with fluctuating demand curve to the extent practicable? The so-called "renewable power purchase obligation" has no legal basis as of now. The Ministry of power, Gol, has issued a direction, but the direction itself is not covered by any Section of the Electricity Act, 2003 Act. Why should DISCOMs feel compelled to absorb unwarranted power from renewables, if alternative options are available? What is the quantum of thermal power that is being backed down in order to purchase must-run RE? How much is the amount which is being paid towards fixed charges for backing down thermal power year-wise, for the last, current and next financial years? It may be noted that the DISCOMs, in the past, vehemently argued before the Commission during public hearings on RPPO proposals not to enhance the minimum targets of such purchases from the then prevailing 5%.

India has set out a huge RE target of 500 GW by the year 2030 and the States need to plan for RE capacity addition accordingly.

The RPPO percentage arrived are based on the projections of demand as well as RE power availability and the definite percentages can be concluded based on the actual only in future. In this connection, the RPPO achieved by TSDISCOMs for the past years is as follows:

Financial Year	Solar RPPO %		Non-Solar RPPO %		Total RPPO %	
	As mandated by TSERC	Achieved by DISCOMs	As mandated by TSERC	Achieved by DISCOMs	As mandated by TSERC	Achieved by DISCOMs
2018-19	5	9.	0.6	0.83	6	10.4
2019-20	5	9.	0.7	0.67	6.5	10.53
2020-21	6	9	0.7	0.79	7	9.99
2021-22	7	8	0.	0.96	8	9.76

As could be seen the TSDISCOMs could achieve Solar RPPO obligation but barely reach the Non-Solar RPPO targets in the past years. If proper RE power purchases planning is not done in time, this would further become difficult both due to increasing RPPO targets and also increasing power demand.

In view of the limited Non-solar potential in the state of Telangana, the excess Solar RPPO % can be utilized to meet the Non-Solar RPPO % in terms of RPO Regulation No. 7 of 2022.

Though at present, it is not mandatory for the State DISCOMs

		<p>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 44 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>
5.	<p>SOUNDING DEATH-KNELL OF TS GENCO? : The DISCOMs have relied on the revised scheme for flexibility in generation and scheduling of thermal/hydro power stations through replacement of thermal/hydro power with renewable energy and storage power as per the notification dated 12.4.2022 issued by the Ministry of Power, GoI. The DISCOMs, referring to the targets set in the said notification, have concluded that “thus, the thermal plants would be restricted to operate until technical minimum and the rest of power shall be replaced with equivalent RE power”. They have also maintained that “while issuing the station-wise targets for substituting the thermal power with RE power, it was directed that all CPSUs, State and private generation utilities to take appropriate action to meet the year-wise trajectory i.e., 20% in 2023-24, 35% in 2024-25 and 45% in 2025-26 of the total target” (ibid pp 14-15). Can or will the generating capacities of thermal stations of TS GENCO be kept idle as per the targets fixed by the MoP, GoI? There are binding obligations under terms and conditions in the PPAs in force and the DISCOMs will have to pay fixed charges for backing down generating capacities of thermal stations of TS GENCO. Will the MoP, GoI, reimburse the fixed charges to the DISCOMs? Will the DISCOMs demand the MoP, GoI, accordingly? If TS</p>	<p>The reasons for procuring higher RE are mentioned in the previous comment.</p> <p>It is to note that no backing of thermal power capacity has taken place to compensate for purchase of RE.</p> <p>TS Discoms cannot comment on the future commitments of TS Genco.</p>

<p>GENCO is forced not to declare availability of generating capacity as per the whimsical targets of the MoP, Gol, it will be forced to plunge into a crisis. The DISCOMs have also maintained that “all the old Thermal Power Plants may be closed after their respective PPA periods and in future Battery Energy Storage System may cater to the Peak Demand needs. Telangana State has no future plans for expansion of Thermal Power Generation Plants to cater to the needs of the Long-Term Power Demands. Instead, going with Solar Power Capacity addition” (pp 29-30 of the Commission’s order dated 22.6.2022). Such a move will sound the death-knell of TS GENCO, with the trend of purchasing solar power from plants of private corporate entities, instead of getting solar power plants set up by GENCO near the load centres. Experience is confirming that, backing down thermal stations in order to purchase unwarranted RE is leading to need for purchasing power in the market, thereby affecting the interests of TS GENCO and consumers of power. The said notification of the MoP, Gol, cannot protect the interests of GENCO and consumers of power; it cannot prevent under-utilisation of generating capacities of thermal and hydel power projects in such a scenario, thereby wasting thousands of crores of Rupees of public money invested for setting up thermal and hydel power stations. The proposal to replace hydel power projects with RE units is the height of perversity. Above all, the MoP, Gol, does not take any responsibility for the adverse consequences that would arise as a result of implementing its whimsical notification issued in the interest of private corporate entities which set up solar power plants and other RE units. It does not provide any financial assistance to mitigate the loss being caused to TS GENCO and burdens being imposed on consumers of power. It is nothing but exercising authority arbitrarily, irrationally, crudely and imprudently, without any responsibility and accountability on the part of</p>	<p>TS Genco has proposed to enter into solar PPA with TSNPDCL and set up solar power plant of 4.6 MW capacity at MHS Peddapally and would be installed near load dispatch center i.e., injection at 33 kV level at 33/11 kV sub-station at a competitive price.</p>
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	<p>the Modi government for the disastrous consequences that would arise as a result of implementing the same, as if the Modi government were wisdom personified for dictating to the states on what should be done, thereby usurping the powers and discretion of the state governments to take decisions in the interest of the states. The approach to comply with such questionable moves of the Modi government reflects lack of concern for interests of the state and consumers, on the one hand, and negates the posture of the GoTS against anti-state, anti-consumer and anti-public sector moves of the GoI serving the interests of private corporate entities and promoting and pampering crony capitalism, on the other.</p>	
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6.	<p>UNWARRANTED PURCHASES OF POWER: In its order dated 22.6.2022 issued in O.P.No.46 of 2022, according consent to the TS DISCOMs to enter into “power usage agreements” for purchasing 1692 MW of solar power of private projects to be set up in Rajasthan, Gujarat and Tamil Nadu through the NTPC Limited under Central Public Sector Undertaking (CPSU) Scheme Phase II, the Hon’ble Commission, as well as the DISCOMs, have put forth several arguments in support of the same. So is the case with order dated 26.10.2022 issued by the Commission in O.P.No.69 of 2022, according in-principle approval for procurement of a total of 2545 MW of solar power by TS DISCOMs through NTPC, NHPC and SECI. In the order dated 22.6.2022 cited above, the Hon’ble Commission has contended, inter alia, that “the latest market conditions enable TSDISCOMs to sell surplus RE power to the other needy purchasers in real time market through Green Term-Ahead Market (GTAM). TSDISCOMs by means of economic models to explore for storage of excess solar power, if any, by means of pumped hydro power storage facilities available at Nagarjunasagar and Srisaillam hydel projects, in managing its peak demand occurring during night-time when the solar power is not available” (page 31). In its order dated 26.10.2022, the Hon’ble Commission has maintained, inter alia, that “for efficient utilization of the procurement of Solar power and to optimize the power purchase cost, TSDISCOMs need to explore the other options such as effective operation of the pumped storage stations and banking mechanism with the other State DISCOMs so as to bank the surplus power and utilise the same in times of deficiency” (Page 17). We request the Hon’ble Commission to consider the following points, among others:</p> <p>A. The observations of the Hon’ble Commission imply that there will be excess solar power which the DISCOMs will be forced to purchase. In</p>	<p>The reasons for procurement of RE has already been given in above sections.</p> <p>A & B. The reasons for purchase of excess RE is detailed in section 2.f</p>
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<p>other words, proposing and giving consent to procuring the said solar power are unwarranted to the extent the permitted quantum is excess.</p> <p>B. Normally, by virtue of intermittence of RE, especially of solar power, it should supplement base-load thermal power, not vice versa. But the approach of the DISCOMs, as is the stand of the Modi government, seems to be topsy-turvy.</p> <p>C. Scope for sale of solar power and other RE outside the state, even if it is excess, is very remote, as already explained above. Since entire RE/NCE, being must-run, is being considered under power purchase to be supplied to the consumers in the RSTO and availability of surplus power from thermal stations concerned also is being shown under merit order, treating must-run RE as surplus power does not arise. Only surplus power shown under merit order can be sold in the market outside the state, if possible.</p> <p>D. Purchase of power is fundamentally to meet demand in the state, not to sell outside in the speculative market.</p> <p>E. For storage of excess RE, including solar power, no viable and economical battery storage system is developed and put to use so far. Based on such a possibility in future, entering into PPAs for procurement of unwarranted solar power and other RE a few years in advance is detrimental to the interests of the DISCOMs and their consumers of power.</p> <p>F. Pumped hydro power storage facilities available in the state are with a meagre generating capacity. As a standard practice, they are already being run to meet peak demand for power, even when base-load thermal capacity available cannot meet peak demand fully, i.e., to supplement thermal power.</p>	<p>C. Telangana Discoms have a dedicated wing (Telangana State Power Coordination Committee) to focus on all the power purchase related matters of the Discoms. Under the purview of TSPCC, TS Discoms have been utilizing the GDAM and GTAM products of Exchanges, for sale or purchase of green power.</p> <p>D. The main purpose of TS Discoms regarding purchase of power is to supply quality and reliable power to all the consumers and to ensure the policy of 24 x 7 supply to all categories of consumers. However, 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. This would enhance the financial performance of TS Discoms and would ultimately be beneficial to the end consumers.</p> <p>E. The reasons for procuring solar power are already mentioned in above sections. TS Discoms are not purchasing Solar just based on the possibility of storage systems development in future.</p> <p>G. Based on the availability/requirement of power, TSDISCOMs are entering Banking Agreements with other states who have different power requirement patterns. Banking of power is always beneficial to TSDISCOMs as Power will be received during Peak season where market rates will be higher and returned during non-peak season. Banking of power is only energy to energy transaction.</p> <p>H. The State DISCOMs are entrusted with the dual</p>
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<p>G. Banking solar power with DISCOMs of other states is not a one-way affair. If DISCOMs of other states and private generators want to bank their surplus solar power and other RE with TS DISCOMs, it would neutralise the balance, at the least, or overburden the TSDISCOMs, at the worst. Moreover, banking of power has its costs.</p> <p>H. For procuring RE, the DISCOMs should adopt a cautious, gradual and holistic approach, not to be forced indiscriminately or permitted to rush hastily, taking into consideration the need for ensuring a balance between ideal power mix and fluctuating demand curve to the extent practicable, thereby leaving scope for availability of surplus power to the minimum extent possible technically.</p> <p>I. Instead of promoting centralised solar plants owned by corporate entities, which operate at about 20% capacity utilisation factor and which involve transmission losses of 15% or so from outside the state, the GoTS could have opted in favour of distributed solar power generation near load centres in the state through real competitive bidding and solar irrigation pump sets and rooftops, which not only avoid transmission losses, but also with reverse metering, enable the consumers to generate surplus energy for the grid at a lower cost, especially taking advantage of the central subsidy under the KUSUM scheme. The Hon'ble Commission has already given its consent for implementing the KUSUM scheme. The DISCOMs have highlighted the virtues of distributed solar generation earlier during public hearings of the Commission. In O.P.No.1 of 2023 (of TS GENCO), NPDCL has shown a saving of Re.0.76 per unit due to installation of solar power plant near load centres. Calculations by experts show that replacing agricultural pump sets with solar power pump sets would ensure recovery of the costs to be incurred for the same within a few years</p>	<p>responsibility of not only to adhere to the various regulations/orders issued by TSERC/CERC/MNRE/MoP but also the bigger mandate enlisted in the Electricity Act 2003, to maintain reliable power supply with least cost principle. As such to meet the growing demand of the state of Telangana and to ensure 24 Hrs uninterrupted power supply to all categories of consumers including agricultural services as per the directions of Govt of Telangana State, TSDISCOMs are planning for procurement of power.</p> <p>I. Discoms have been planning to procure power through both ways i.e., through distributed mode (as mentioned in response to objection 5 above) and also through centralized mode for the reasons of cost-effectiveness.</p> <p>TS Discoms have also been encouraging the consumers for installation of RoofTop Solar in their premises (as on 30.09.23 the installed RoofTop Solar in Telangana state is 268 MW).</p>
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	<p>by reducing and avoiding need for subsidy from the government for supply of power to agriculture on a long-term basis. However, purchasing solar power from plants of private corporate entities, that, too, set up in other states, seems to be irresistibly attractive to the powers-that-be, going by the present trend. Here, the approaches and interests of the central and state authorities are coalescing.</p>																	
<p>7.</p>	<p>NEED FOR REVIEWING LOAD FORECAST AND PROCUREMENT PLANS PERIODICALLY : The DISCOMs have shown energy availability, requirement and surplus for the current and next financial years as given below:</p> <table border="1" data-bbox="212 730 1186 1023"> <thead> <tr> <th>Particulars</th> <th>2022-23 estimates</th> <th>MU</th> <th>2023-24</th> </tr> </thead> <tbody> <tr> <td>Energy availability</td> <td>79222</td> <td></td> <td>96554</td> </tr> <tr> <td>Energy requirement</td> <td>74076</td> <td></td> <td>83113</td> </tr> <tr> <td>Surplus</td> <td>5146</td> <td></td> <td>13441</td> </tr> </tbody> </table> <p>In one year, availability of power is going to increase by 17332 MU from 79222 MU in 2022-23 to 96554 MU in 2023-24. It works out to an increase of 21.88%. Requirement is increasing by 9036 MU from 74076 MU in 2022-23 to 83113 MU in 2023-24. It works out to an increase of 12.20%. This disparity between requirement and availability of energy confirms that 'load generation balance' worked out by the DISCOMs and considered by the Hon'ble Commission has gone haywire, resulting in huge imbalance. For the year 2022-23, against the projected surplus of 3066 MU, the revised surplus</p>	Particulars	2022-23 estimates	MU	2023-24	Energy availability	79222		96554	Energy requirement	74076		83113	Surplus	5146		13441	<p>TS Discoms have considered the month-wise energy availabilities for FY 2023-24, 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 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 blocks, certain months of the year, is expected to be procured from the short-term market.</p> <p>TS Discoms would like to clarify that eventhough there was surplus in FY 2022-23 as per the Tariff Order for FY 2022-23, the surplus is on annual basis. TS Discoms have submitted a detailed analysis to Hon'ble TSERC which indicated that even when there is surplus in annual basis, in certain months (peak months) the availability is lower than the power demand in the state leading to power deficit. TS Discoms cannot fully depend on short-term market to fill the deficit gap as the market rates are unpredictable. Hence, TS Discoms have entered into PPAs with these power plants.</p>
Particulars	2022-23 estimates	MU	2023-24															
Energy availability	79222		96554															
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Surplus	5146		13441															

<p>increased to 5146. The Hon'ble Commission was aware of availability of substantial surplus power for 2022-23, when it determined sale of surplus of 5059.81 MU for that year. The DISCOMs have considered additional availabilities during 2023-24 as given below:</p> <p>YTPS (2x800 MW) – CODs of 1st unit on 1.12.2023 and of 2nd unit on 1.2.2024 are expected.</p> <p>Telangana STPP (2x680 MW) – CODs of 1st unit on 1.1.2023 and second unit on 1.7.2023 are expected.</p> <p>Balance capacity of 396 MW in NTPC CPSU scheme Phase II Tranche 1&2 against capacity of 1692 MW is considered from October, 2022.</p> <p>NTPC CPSU phase II tranche II – 735 MW – COD is expected on 1.4.2023 SECI 1000 MW COD is expected on 1.4.2023</p> <p>When the Hon'ble Commission has accorded consent to the DISCOMs for procurement of 1692 MW of solar power through NTPC from eight stations, whose revised SCODs are from 27.4.2022 to 25.10.2022, in its order dated 22.6.2022, and for procurement of 2545 MW of solar power through NTPC, NHPC and SECI from eight stations, whose SCODs are from 11.10.2023 to 3.4.2024, in its order dated 26.10.2022, it must have considered the outcome of substantial increase in availability of surplus power as it would be emerging during 2023-24 and thereafter, notwithstanding the arguments put forth by the DISCOMs and the Hon'ble Commission for justifying the proposed procurement of 4237 MW of solar power. The projected deficit of 404 MU for 2023-24 in 'load generation balance' submitted by the DISCOMs has turned out to be absolutely unrealistic, with the projected availability of surplus 13441 MU for the same FY. The above-mentioned additional</p>	<p>The detailed reasons for procuring excess RE has been detailed in the response to section 2.f (intital objections).</p>
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	<p>availabilities and additional availability of 4237 MW of solar would be added, if the scheduled CODs are declared, during 2024-25 also to some extent. As such, in addition to the projected availability of energy for the next financial year, there will be further addition during 2024-25 also. As such, the deficits of 2183 MU for 2024-25, 1571 MU for 2025-26 and 1219 MU for 2026-27 projected in the 'load generation balance' would turn out to be unrealistic and contrary to availability of surplus power, with projected addition of the new capacities and projected trends of growth in purchase and sale of power. While considering need for additional power and entering into PPAs and giving consents to the same, mechanical reliance on the load forecast and procurement plan considered or approved leads to unwarranted consequences with resultant problems, both technical and financial. Experience underlines need for periodical review and appropriate modification of load forecasts and procurement plans based on experience and the existing ground reality, before considering and approving additional power procurement through long-term PPAs. The above-mentioned latest orders issued by the Commission, permitting the DISCOMs to procure 4237 MW of solar power, indicate that no review of the approved load forecast and the ground reality of availability of generation capacity under PPAs in force and likely addition from plants to be considered, leave aside ensuring ideal power mix to be in tune with fluctuating demand curve to the extent practicable, seems to have been made.</p>	
8.	<p>HIGHER FIXED AND VARIABLE COSTS FOR CENTRAL GENERATING STATIONS AND TS GENCO THERMAL STATIONS: Availability of power from central generating stations and fixed and variable costs increase as projected and given below:</p>	<p><u>TS GENCO Stations:</u> TSDISCOMS projected the Fixed Charges of TSGENCO Thermal Stations as per Hon'ble TSERC MYT Order for 4th Control period and Variable charges by considering the base ECR rate computed by the Hon'ble Commission in 4th Control Period.</p>

	Availability MU	Fixed costs	Variable costs (Rs.crore)	
2022-23	18481	2156	4136	<p><u>CGS:</u> The contention of the objector that the fixed cost charges would come down when the plant availabilities of CGS thermal plants are more. However, the statement to certain extent is legitimate in the context of low fixed cost charges, when the CGS Power Plants declares their plant availabilities beyond NAPAF and generate the power more than the threshold PLF and the overhaul fixed cost reduces. However, in the case of ARR Projections for FY 2023-24, NTPC projected the plant availabilities considering addition of new 1600 MW (2x800) at Ramagundam (STPP) in the year 2023 as per APR Act 2014. As a consequence, the fixed cost charges of CGS NTPC thermal plants were increased in ARR Projections for FY 2023-24, vis-à-vis, FY 2022-23.</p> <p>With regards to the comments on higher variable cost charges for the year FY 2022-23, vis-à-vis FY 2023-24, it is to state that most of the CGS generators actual Plant availability was lower than their respective NAPAFs of 80%-85%. Where as in FY.2023-24 the most of the Central Generating Stations have projected their Plant availabilities at higher than the threshold PLFs. The CGS power plants which projected higher PLFs in FY 2023-24 are RSTPS I&II, Simhadri-II, NTECL Vallur and NTPL.</p> <p>In the year 2022, monsoon season of July 2022 turned out to be the wettest month and recorded excess rain fall and witnessed 144.2 MM as against average rain fall of 38.1 MM in the State. This monsoon and heavy rainfall continued until 1st week of December 2022 according to data from the Telangana State Development Planning Society (TSDPS). Thus CGS coal and Lignite based thermal power plants have generated lesser energy.</p>
2023-24	27011	3985	7162	
Hike%	46.15	84.83	73.16%	
<p>The DISOMs have taken these estimates as projected by the CGSs. Compared to the percentage of increase in availability of power from CGSs, the growth rates in fixed and variable costs to be paid for the available power are very high. Since the percentages of PLF for most of the CGSs show increase from 2022-23 to 2023-24, fixed costs per unit should come down. Have the DISCOMs included fixed costs to be paid to the CGSs for backing down their capacities as per merit order, in view of projected availability of abnormal quantum of surplus power for 2023-24? In view of projected availability of abnormal quantum of surplus power, what is the justification in considering availability from some stations, exceeding the threshold level of PLF? What is the basis for projecting abnormal hike in variable costs?</p> <p>Similar is the case with thermal power stations of TS GENCO, with a difference in degree, as given below:</p>				
	Availability MU	Fixed costs	Variable costs (Rs.crore)	
2022-23	24819	4117	1671	
2023-24	29774	5676	2280	
Hike%	19.96%	37.88%	36.56%	
<p>The above questions, as in the case of CGSs, apply in the case of thermal</p>				

	<p>stations of TS GENCO also. What are reasons for increase in variable costs for Singareni TPP per unit from Rs.2.73 in 2021-22, to Rs.3.26 in 2022-23 and to the projected Rs.3.19 in 2023-24? We request the Hon'ble Commission to examine the issues and determine availability, fixed and variable costs of the CGSs and thermal stations of TS GENCO in a prudent way and in accordance with applicable terms and conditions in their respective PPAs.</p>	<p><u>Singareni Power Plant:</u> In respect of increase/variation in Variable cost for Singareni Thermal Power Plant (STPP), it is to submit that, Coal is supplied to STPP under Bridge linkage MOU entered between STPP and SCCL. The coal pricing under Bridge linkage MOU depends on the Market Prices. Further, TSDISCOMs requested M/s. STPP to pursue with ministry of Coal, Gol on swapping of Naini Coal block with SCCL mines, as per TSERC direction.</p>
9.	<p>HIKE IN VARIABLE COST OF SEMBCORP : Wide fluctuations in variable costs of Sembcorp Energy India Ltd. (formerly Thermal Power Tech) are projected as received from its two units. While variable cost per unit of SEIL-I has come down from Rs.5.13 in 2021-22 to Rs.2.32 in 2022-23 and to Rs.2.31 in 2023-24, the same for SEIL-II has shown higher increase from Rs.2.59 to Rs.3.06 to Rs.3.86 for the same years, respectively. Why is the hike of 49.03% from 2021-22 to 2023-24 in variable cost for SEIL II considered?</p>	<p>The variable cost of 269.45 MW PPA for the FY 2021-22 is Rs.5.13/Kwh which includes the Supplementary bills of Change in Law as per the CERC order Dt.21.08.2020 in petition 217/MP/2016 for the FY 2015-16 to FY 2020-21 and Late Payment Surcharge. The actual variable cost of 269.45MW PPA for FY 2021-22 is Rs. 2.23/Kwh. CERC in its order dated 21.08.2020 allowed following components as a change in law:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Increase in royalty on coal and additional levies (DMF & NMET levy) <input type="checkbox"/> Increase in rate of Clean Energy Cess including GST Compensation Cess <input type="checkbox"/> Imposition of Excise Duty on Coal. <input type="checkbox"/> Increase in Service Tax and GST on Railway Freight, Domestic Coal Ocean Transport, Port Vessel Charges, Port Cargo Charges, Port Handling Charges, Terminal Charges, Unload Port Cargo Charges and Imported Coal Ocean Transport Freight. <input type="checkbox"/> Decrease in Customs Duty on Imported Coal <input type="checkbox"/> Imposition of Countervailing Duty on Imported Coal. <input type="checkbox"/> Increase in Busy Season Surcharge on Railway freight.

		<ul style="list-style-type: none"> <input type="checkbox"/> Increase in Development Surcharge on Railway freight. <input type="checkbox"/> Imposition of coal Terminal Surcharge on railway freight. <input type="checkbox"/> Increase in Central Sales Tax. <input type="checkbox"/> Carrying Cost. <p>The variable cost of 269.45 MW PPA are being made based on the PPA Tariff schedule and CERC Escalation rates.</p> <p>The reason for increase in assumed variable charges for SEIL-II (570MW PSA) for FY 2023-24 is mainly due to increased Coal prices in the international market. The assumed variable charges is based on available forward prices of Imported Coal and USD to INR exchange rates. (Actual may vary depending on prevailing coal prices and forex rates).</p>
10.	<p>GETTING SHARE OF TS DISCOMS FROM MACHKUND AND TUNGABHADRA HYDEL POWER STATIONS: In response to the direction of the Hon'ble Commission to the DISCOMs to actively pursue the matter with APGENCO/APTRANSCO for availing the share of power of Telangana in the MACHKUND and TUNGABHADRA inter-state hydel power projects, DISCOMs have submitted that the issue is continuously pursued with APGENCO for extension of PPA and scheduling of power from the two hydel projects in Karnataka and that the report is submitted to the Hon'ble Commission. What is the latest position?</p>	<p>All out efforts are being made by TSDISCOMs/TSPCC for scheduling of power from the two Inter-state Hydel Plants Machkund and TB Dam. TSDISCOMs/TSPCC requested MD, APGENCO to take necessary steps for further extension of PPA and also assured payments for scheduling of power from these Inter-State projects without linking with any other issues. In reply MD, APGENCO has informed that scheduling of power and extension of PPA will be examined only after clearance of existing arrears.</p> <p>TSPCC/TSDISCOMs approached SRPC to kindly initiate the steps for scheduling of rightful share of power to Telangana from Inter-state Hydro Projects. The matter was deliberated in the 53rd meeting of Commercial Sub-Committee held on 19.10.22 and further in the 44th Meeting of SRPC held on 5th November 2022.</p> <p>In the meeting it was decided that the pending payments</p>

		between Telangana and AP is sub-judice in the Hon'ble high court of Telangana. It is prudent to await the Court decision.																
11.	<p>AGREEMENTS WITH I&CAD FOR SUPPLY OF POWER TO LIFT IRRIGATION SCHEMS : The DISCOMs have shown requirement of power for lift irrigation and agriculture in HT as given below:</p> <table border="1" data-bbox="222 451 911 683"> <thead> <tr> <th>DISCOM</th> <th>2022-23</th> <th>2023-24</th> <th>MU</th> </tr> </thead> <tbody> <tr> <td>TS SPDCL</td> <td>1821.45</td> <td>3786.40</td> <td></td> </tr> <tr> <td>TS NPDCL</td> <td>1490.56</td> <td>4297.86</td> <td></td> </tr> <tr> <td>TOTAL</td> <td>3312.01</td> <td>8084.26</td> <td></td> </tr> </tbody> </table> <p>It works out to an increase of 144%. After taking this highest growth rate, among growth rates of other categories, into account, abnormal availability of surplus energy is shown. Details of long-term load forecast, procurement plan, etc., are not being made public by the DISCOMs. No public hearings are held on the same, despite repeated requests. Whatever data given in some of the orders of the Hon'ble Commission is very brief. How many lift irrigation schemes are coming up and when, their requirement for power from which dates, to meet the same additional generation capacity contracted by the DISCOMs, addition of capacities of transmission and distribution networks, etc., are not being made public. If the said lift irrigation schemes are not completed as per schedule, the addition of generation capacities, capacities of transmission and distribution networks intended for supplying power to those schemes remain idle during the period of delay in executing the said lift irrigation schemes. In such a situation, on whom the burdens of surplus power and idle transmission and distribution network capacities created for those schemes are being, or will be, imposed? Have the DISCOMs entered</p>	DISCOM	2022-23	2023-24	MU	TS SPDCL	1821.45	3786.40		TS NPDCL	1490.56	4297.86		TOTAL	3312.01	8084.26		<p>For sales projections of HT LIS, 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>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 & Godavari rivers and upcoming additional loads. These loads are further considered to be operating only at a 60% load factor by I&CAD department. However, TS Discoms, based on their analysis and historical experience have only considered half (50%) of the projections given by I&CAD department for HT 132 KV LIS category.</p>
DISCOM	2022-23	2023-24	MU															
TS SPDCL	1821.45	3786.40																
TS NPDCL	1490.56	4297.86																
TOTAL	3312.01	8084.26																

into agreements with the department of irrigation and command area development, imposing the condition that it should bear the applicable charges during the period when the said lift irrigation schemes cannot consume power as per contracted demand and use transmission and distribution networks due to delay in execution of those schemes? If so, what are the details thereof? The DISCOMs have explained that "licensee has considered the expected additional loads and energy requirement for FY 2023-24 based on the information received from the I&CAD, which was further duly analyzed and moderated considering the licensee's experience of the historical consumption along with other allied factors." If the lift irrigation schemes shown in the submissions of the DISCOMs come into operation as "moderated" by them, the problems of surplus power, transmission and distribution capacities remaining idle proportionately on account of that may not arise. After 2023-24, demand for power from lift irrigation schemes may not show increase at abnormal level like 144% shown for the next financial year. As the DISCOMs have pointed out, due to uncontrollable factors like rainfall, water levels in reservoirs, floods, etc., variations in operation of LI pumps may take place, leading to considerable reduction in need for consumption of power like the negative growth rate recorded in the first half of 2022-23.

RETHINKING ON 24 HRS POWER SUPPLY TO AGRICULTURE : It is submitted that sale of power to LT agriculture has shown a drop of 6.13% for NPDCL and of 0.17% for SPDCL in the FY 2021-22. While NPDCL has expressed the view that "the agricultural consumption would not further increase and remain at the level of estimated sales for FY 2022-23," SPDCL has expressed the view that "the agricultural consumption would come down from the level of sales recorded in FY 2021-22. Keeping in view the additional loads to be

As per the policy of Government of Telangana, TS Discoms are directed to supply 24 hours of free electricity to all their Agriculture category consumers. In this regard, TS Discoms shall abide by the directions of Hon'ble Commission and GoTS.

added through Lift Irrigation schemes in FY 2022-23 and FY 2023-24, it is expected that the agricultural consumption would not further increase given the fall in use of borewells and arise in canal-based cultivation." Both the DISCOMs have submitted that, "in case the actual sales, despite the LI Scheme operations, emerge to be higher than anticipated, the same may be considered by the Hon'ble Commission in the true-up exercise." While NPDCL has projected sales to agriculture would remain 7290.39 MU for 2023-24 as in 2022-23, SPDCL has projected a reduced growth rate of 4% for 2023-24 compared to the sales in 2022-23. The need for supply of power to agriculture throughout the day and throughout the year has been rightly questioned on various grounds when the scheme was announced by GoTS. Directive No.24 issued by the Hon'ble Commission that "the DISCOMs to explore the possibility of arriving at a consensus among its agricultural consumers regarding the hours of supply for its peak load management" indicates rethinking on continuing the scheme as announced. So also, the reply of SPDCL that, while it is meeting agricultural demand during morning peak hours, "a consensus is arrived with agriculture consumers and awareness is already created among them to avoid using 3-Ph supply during the evening peak hours and the agriculture consumers are now habituated to use 1Ph supply during the evening peak hours and TSSPDCL is successfully meeting the evening peak hours demand" confirms need for prudent change. That the DISCOM has further instructed SEs/Operation "to take the consensus of the agriculture consumers once again regarding the actual hours of supply required to them" confirms rethinking on the scheme and validates by implication some of the objections raised on the scheme. On similar lines, NPDCL has replied that it is conducting awareness programmes with agriculture consumers regarding utilization of supply to agriculture in day time, instead of peak load hours and that they were motivated to remove

	the automatic starters to use the supply whenever required and to avoid the peak demand on the system. The rethinking on the scheme shows need for prudent practices in supplying power to agriculture.																			
12.	<p>REQUIREMENT OF SUBSIDY FOR FREE SUPPLY OF POWER TO AGRICULTURE: NPDCL has shown LT agriculture requirement of power for 2023-24 as 7290 MU and cost of service for unit as Rs.9.93. For free supply of this power, subsidy requirement works out to Rs.7238.97 crore. Similarly, for free supply of 10,591 MU to LT agriculture with a cost of service of Rs.8.47 projected by SPDCL, subsidy requirement works out to Rs.8970.57 crore. Since subsidy being provided by the GoTS for free supply of power to agriculture is far less than requirement, we request the Hon'ble Commission to show in the retail supply tariff order how much subsidy is being provided by the GoTS and how much cross subsidy is being factored category/slab wise and also direct the DISCOMs to show the same in the power bills being issued to the consumers.</p>	<p>In arriving at the subsidy requirement for LT Agriculture category, the objector 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.</p> <p>As per the existing practice, the Hon'ble Commission computes the ACoS-ABR level for each consumer category, and after adjusting the positive and negative cross-subsidy throughout, arrives at the revenue gap and tries to balance the same with the GoTS subsidy commitment.</p> <p>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.</p>																		
13.	<p>ABNORMAL HIKE IN TRANSMISSION CHARGES VIS A VIS CONTRACTED CAPACITY : The DISCOMs have shown contracted capacity and transmission charges for three years as given hereunder:</p> <table border="1" data-bbox="210 1071 1155 1380"> <thead> <tr> <th>FY</th> <th>Contracted capacity (MW)</th> <th>Transmission charges (Rs.crore)</th> </tr> </thead> <tbody> <tr> <td colspan="3">TSSPDCL</td> </tr> <tr> <td>2021-22</td> <td>14989.8</td> <td>2008.87</td> </tr> <tr> <td>2022-23</td> <td>15344.68</td> <td>2383.64</td> </tr> <tr> <td>2023-24</td> <td>15331.58</td> <td>2670.27</td> </tr> <tr> <td colspan="3">TSNPDCL</td> </tr> </tbody> </table>	FY	Contracted capacity (MW)	Transmission charges (Rs.crore)	TSSPDCL			2021-22	14989.8	2008.87	2022-23	15344.68	2383.64	2023-24	15331.58	2670.27	TSNPDCL			<p>For FY 2021-22, the licensees have considered the transmission costs actually paid to TS Transco for that year.</p> <p>For FY 2022-23 and FY 2023-24, the transmission costs are derived by multiplying the transmission tariff (INR/kW/month) with contracted capacity (MW) of TS Transco determined by Hon'ble TSERC in the Transmission MYT Order for 4th Control period issued on 20.03.2020.</p> <p>The Transmission tariffs determined in the Transmission MYT Order for 4th Control period are Rs. 129.45 /kW/Month for FY 2022-23 and Rs.145.14 /kW/Month for FY 2023-24 which is</p>
FY	Contracted capacity (MW)	Transmission charges (Rs.crore)																		
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	<table border="1" data-bbox="212 224 1184 349"> <tr> <td>2021-22</td> <td>6324.33</td> <td>847.56</td> </tr> <tr> <td>2022-23</td> <td>6472.46</td> <td>1005.43</td> </tr> <tr> <td>2023-24</td> <td>6466.71</td> <td>1126.29</td> </tr> </table> <p data-bbox="212 397 1184 1063">The contracted capacity of both the DISCOMs increased from 21315.13 MW in 2021-22 to 21798.29 MW in 2023-24, i.e., by just 2.27%. But, transmission charges during the same period increased from Rs.2856.43 crore to Rs.3796.56 crore, i.e., by 32.91%. Moreover, though the contracted capacity decreased slightly from 2022-23 to 2023-24, transmission charges increased substantially. How has the contracted capacity come down from the current financial year to 2023-24, when higher demand for power and addition of generation capacities under PPAs are taking place? What are the reasons, as well as justification, for abnormal increase in transmission charges vis a vis contracted capacity during the three FYs? We request the Hon'ble Commission to review the same thoroughly, since the DISCOMs have submitted that they have adopted the transmission charges and transmission capacity approved in the 4th MYT tariff order for the projected transmission charges for the FY 2023-24. The DISCOMs have not made it clear whether requirement of contracted capacity is in tune with transmission capacity approved in the 4th MYT tariff order.</p>	2021-22	6324.33	847.56	2022-23	6472.46	1005.43	2023-24	6466.71	1126.29	<p data-bbox="1184 224 1997 267">same for both the Discoms.</p> <p data-bbox="1184 300 1997 373">The contracted capacities with the TS Transco determined in the Transmission MYT Order for 4th Control period are:</p> <p data-bbox="1184 373 1997 479">For TSSPDCL: 15344.68 MW for FY 2022-23 and 15331.58 MW for FY 2023-24</p> <p data-bbox="1184 479 1997 592">For TSNPDCL: 6472.46 MW for FY 2022-23 and 6466.71 MW for FY 2023-24</p> <p data-bbox="1184 625 1997 738">The licensees have considered the above numbers taken from the TS Transco MYT Order for 4th control period to derive the Transmission costs</p> <p data-bbox="1184 771 1997 917">As per the Transmission Tariff for 4th control period (FY 2019-20 to FY 2023-24) the contracted capacity of both the DISCOMs for FY 2022-23 and FY 2023-24 are 21817.140 MW and 21798.290 MW respectively.</p> <p data-bbox="1184 917 1997 1177">At the time of the transmission tariff order was issued by Hon'ble TSERC the PPAs of Bagase plants such as M/s Ganapathi Sugar Industries Ltd. and M/s. Kakatiya Cement Sugar & Industries Ltd. are there with a validity up to FY 2022-23. The decrease in contracted capacity of 18.85 MW in FY 2023-24 is due to the non consideration of the Bagase plant for FY 2023-24 due to expiry of concerned PPA's</p> <p data-bbox="1184 1177 1997 1291">TSDISCOMs has projected the Transmission Charges for FY 2023-24 as approved by Hon'ble TSERC in the 4th Control period.</p>
2021-22	6324.33	847.56									
2022-23	6472.46	1005.43									
2023-24	6466.71	1126.29									
14.	IRRATIONAL REGULATIONS OF CERC AND HIGHER BURDENS OF PGCIL CHARGES : The DISCOMs have shown Power Grid Corporation of India Ltd.	The details of the contracted capacity and PGCIL charges and the methodology for calculation are elaborated by TS									

<p>(PGCIL) charges as given below:</p> <table border="1" data-bbox="220 293 1050 397"> <thead> <tr> <th data-bbox="220 293 451 332">2021-22</th> <th data-bbox="451 293 745 332">2022-23</th> <th data-bbox="745 293 1050 332">2023-24</th> </tr> </thead> <tbody> <tr> <td data-bbox="220 358 451 397">1558</td> <td data-bbox="451 358 745 397">1601</td> <td data-bbox="745 358 1050 397">1532 (In Rs.crore)</td> </tr> </tbody> </table> <p>They have not given the total contracted capacity considered for working out PGCIL charges. The DISCOMs have explained that as per regulations and fixed charges determined by CERC for a period of 5 years, PGCIL has been recovering the full fixed charges through point of connection (POC) rates, subject to reconciling the entire amount on a pro-rata basis of payments in every quarter and if recovery of fixed charges are made lesser or higher side by PGCIL in every month. Apart from the CGSs, CSPDCL and Sembcorp capacities which they get, and power being procured from IEX have been considered for working out PGCIL charges, the DISCOMs have explained. I request the Hon'ble Commission to consider the following points, among others:</p> <p>A. As per the Connectivity and General Network Access to the inter-state Transmission System Regulations, 2022, notified by the CERC, with effect from 15.10.2022, the criteria of levy of ISTS charges is shifted from long-term access (LTA) to General Network Access (GNA). The GNA quantum is determined based on actual ISTS drawls in the past three years which include short-term purchases in the market by DISCOMs. As a result, the deemed GNA quantum for Andhra Pradesh is notified as 4516 MW, with a meagre addition of capacity of 6.4 MW for 2023-24, while the present level of LTA is 1750 MW. This shows the irrationality and arbitrariness of the latest ISTS regulations issued by the CERC. What was the LTA contracted capacity of TS DISCOMs</p>	2021-22	2022-23	2023-24	1558	1601	1532 (In Rs.crore)	<p>Discoms in their ARR & FPT petitions and the additional information submission to Hon'ble Commission.</p> <p>The CERC while notifying the draft GNA Regulations 2022, declared, inter-alia, the deemed GNA quantity Telangana State as 6140 MW and has sought the objections, views, suggestions etc., from the stake holders/States/LTTCs in the country. However, The Telangana State total contracted capacity for the Inter State Transmission capacity with PGCIL/CTUIL is 4119.574 MW.</p> <p>The CERC in the draft GNA Regulations 2022 calculated all the States GNA Quantum, inter-alia, for Telangana as 6140 MW with a methodology adopted with considering peak and average peak demand of a year for past three years. Most of the states, including Telangana objected that the methodology adopted for arriving at the deemed GNA quantity for the states was irrational, unscientific, illogical and injustice to the DICs/States</p> <p>The CERC notified the GNA regulations 2022 and made it operation w.e.f. 15.10.2022 onwards, without the T-GNA (temporary GNA) provisions. The CERC did not consider the objections, views, comments, suggestions etc of the States. The CERC GNA Regulations 2022 stipulated that calculation of GNA capacity for payment of ISTS Transmission Charges (POC) is based on methodology specified in the CERC Sharing Regulations 2020, until notification of new methodology.</p> <p>Now, a new ±800kV Raigarh-Pugular-Trissur HVDC bi-polar lines link was commissioned on 06.09.2020 and the CERC has issued tariff order on the above said line on 22.09.2022 and kept the asset of the above said line under Regional Component</p>
2021-22	2022-23	2023-24					
1558	1601	1532 (In Rs.crore)					

<p>under ISTS regulations before they have come into force from 15.10.2022 and the monthly charges paid by them. What is their LTA contracted capacity now, with additions of capacities made after 15.10.2022 and whether the deemed GNA quantum is taken into consideration.</p> <p>B. With the said change, the PGCIL charges to be paid by AP DISCOMs increased by 49.42%. Since the TS DISCOMs have stated that the estimated PGCIL charges are subject to revision later, it implies that additional amounts may be imposed on them by PGCIL which, in turn, would lead to their claiming the same under true-up from the consumers.</p> <p>C. Short-term market purchases, by their very nature, are temporary. To transmit power under short-term purchases from one state to another, PGCIL uses existing transmission capacity only; it cannot add additional capacity for that purpose. If spare transmission capacity is not available, it cannot transmit power from one state to another state under short-term purchases. Therefore, treating short-term purchases for the last three years as the basis for determining the so-called deemed GNA quantum is an absurdity.</p>	<p>without considering the requests of all the Southern States to consider the said line under National Component. Aggrieved with the impugned order, the TANGEDCO being the LTTC, has filed an appeal before APTEL, New Delhi vide Appeal No.433 of 2022 to consider the said HVDC line as National Component. If the said line asset is under National Component, Telangana would be benefitted by Rs.6-7 Crs/Month, since the tariff of the line will be shared among all the states/DICs in the Country. The case is pending before APTEL, New Delhi as of now.</p> <p>No separate PoC charges are being paid by TSDISCOMs for the power procured under short term after introduction new sharing Regulations 2020 ie., 1st November 2020.</p>
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- D. The new 800 KV HVDC line commissioned between Raigarh in WR-Pugulur in Southern Region is placed in the regional component of ISTS. The commercial operation of the line was declared in September, 2022, and the monthly additional commitment on account of this line is being imposed on the DISCOMs of southern states as per the tariff determined recently by the CERC. Adding a new 800 KV line in the regional component of ISTS charges, irrespective of contracting a part of that capacity by a state under the GNA regulations, is equally irrational. When a state or states in a particular region do not require additional transmission capacity on a long-term basis, addition of unwarranted transmission capacity by PGCIL as it decides and adding the burden of charges for the same on a state, which does not require that capacity, is questionable, in principle. What is the impact of such an irrational arrangement on the TS DISCOMs?
- E. In the name of adding and maintaining spare transmission capacity to facilitate transmission of power under inter-state short-term purchases and imposing ISTS charges annually based thereon, irrespective of the quantum of power under such short-term purchases or no short-term purchases, is inequitable. Deemed GNA quantum is nothing but introduction of a variant of payment of fixed charges for deemed generation of power in the inter-state transmission system, thereby imposing unjust burdens on consumers of power.
- F. If less than contracted capacity of PGCIL is utilised by the DISCOMs for any reason, that unutilised capacity can be, or is being, utilised for transmission of power under inter-state transmission of short-term

power. As such, to the extent such unutilised capacity is utilised for transmission of short-term power by the DISCOMs which contracted the capacity on long-term basis, no ISTS charges should be collected for that capacity. Otherwise, it would be tantamount to charging ISTS charges twice for the same capacity.

G. Addition of transmission capacity by PGCIL should be done in a planned manner to meet requirements of the states and such capacities should be apportioned to the DISCOMs based on their long-term contract of the required capacity. It is arbitrary to impose ISTS charges on the capacities which DISCOMs have not contracted for and are not using.

H. Basically, the failures of the Gol in ensuring supply of fuels like coal and natural gas allocated by it to the power plants concerned are leading to scarcity for power to the DISCOMs and their dependence on short-term market purchases, including from the exchanges. So also, the obligations being forced on the DISCOMs by the Gol under RPPO, leading to purchase of high-cost, must-run and unwarranted renewable energy, which cannot meet peak requirements, are also forcing the DISCOMs to back down thermal power and pay fixed charges therefor and also go in for market purchases on short-term basis. For its failures of commission and omission, the Gol is penalising the consumers of the DISCOMs by imposing ISTS charges under the deemed GNA quantum arbitrarily and irrationally. The Gol should reimburse the avoidable additional expenditure being incurred by the DISCOMs for purchasing high-cost RE, for paying fixed charges for backing down thermal power and for purchasing thermal power at higher costs in view of the generation plants being forced by the Gol to use costly imported coal. The GoTS should demand the Gol

accordingly.

- I. For the year 2023-24, the projected availability of total surplus power is 13441MU. Experience over the years confirms that, even when huge surplus power was available, the DISCOMs could not sell it, except a meagre quantum. For the year 2023-24, the DISCOMs have not proposed to sell surplus power outside the state. In other words, for the FY 2023-24, the DISCOMs do not require any additional transmission capacity from the CTU to transmit their surplus power, though the ISTS charges for any supply of surplus power outside the state will have to be borne by the purchaser. The DISCOMs have proposed purchases of 136 MU from the market on short-term basis for the next financial year. Even then, the DISCOMs will be saddled with the burden of ISTS charges based on the deemed GNA quantum determined by PGCIL as per the latest regulations of CERC. In other words, even when the DISCOMs do not sell their power outside the state and do not purchase or purchase a meagre quantum of power in the market from outside the state, CERC's regulations impose avoidable burdens of ISTS charges under the deemed GNA quantum for which the transmission capacity of the CTU is not utilised by the DISCOMs, but deemed to have been utilised based on their short-term market purchase in the last three years.
- J. The GNA regulation issued by the CERC confirms the hypocrisy being exhibited in the so-called reforms under the Modi dispensation. It confirms that the exemption of inter-state transmission charges to solar power plants set up during the specified period is a pro-corporate and anti-consumer jugglery of the Modi government to hoodwink the people that it is giving such a benefit in the interest of the consumers of power, while, in reality, it is intended to show that

	<p>the price of solar power from the plants of corporate houses like the Adani group is relatively lower, but, in practice, it is recovering the costs of such make-believe exemption from the consumers of power in the form of higher ISTS charges for the GNA deemed quantum. The period for such exemption is being extended by the GoI keeping in view non-completion of the solar power units by the corporate companies of its choice. If the Modi government has even a wee bit of sincerity, it should reimburse the full ISTS charges to PGCIL which the GoI has exempted for transmission of solar power from the plants set up during the period specified by it till completion of the period of such exemption granted by it and dispense with the arrangement of imposing unjustified burden on consumers in the form of the ISTS charges for the deemed GNA quantum. GoTS should demand the Modi government accordingly. We request the Hon'ble Commission to give an appropriate piece of advice in this regard.</p> <p>K. It is not known whether the TS DISCOMs raised any objections before CERC during the course of regulatory process of the latter for issuing the GNA regulations. At least now, they should seek a review of the irrational and imbalanced regulations, instead of coolly seeking the permission and approval of the Hon'ble Commission to allow them to impose all these questionable burdens on, and collect the additional charges from, their consumers by including the same in the retail supply tariffs or claiming under true-up later.</p>	
15.	<p>DISTRIBUTION COSTS AND DISTRIBUTION LOSSES: The DISCOMs have shown increases in distribution costs as approved in the MYT for the 4th control period as given below:</p>	<p>TS Discoms would like to clarify that the Distribution losses for FY 2022- 23, have been computed based on the voltage-wise distribution loss targets prescribed by the Hon'ble Commission in its Wheeling Tariff Order for the 4th Control Period</p>

	<p>DISCOM Distribution costs for 2022-23 2023-24 Rs. crore</p> <p>TSSPDCL 4670.72 5168.36</p> <p>TSNPDCL 3601.25 4081.42</p> <p>There is slight decrease in contracted capacities (SLDC) from the current financial year to the next financial year. NPDCL has shown revised estimation of distribution losses, including EHT sales, of 9.50% against 8.6% approved for the year 2022-23, while SPDCL has shown the estimate for the same year as 8.44%. Despite various steps the DISCOMs have explained as being taken for strengthening distribution system, especially in the light of claimed reduction in consumption of power for LT agriculture, we request the Hon'ble Commission to review the situation and take appropriate decisions on the percentage of reduction in distribution losses to be achieved by the DISCOMs.</p>	
16.	<p>WHY PREPAID METERS? : The Hon'ble Commission has directed the DISCOMs to take steps for installation of prepaid smart meters with latest technology for "all interested consumers." At the same time, the Commission also directed the DISCOMs to submit "a time bound action plan for replacement of existing meters with prepaid smart meters with two way communication in the interest of reveue realisation of the DISCOMs." If prepaid meters are to be installed for "all interested consumers," it is left to the discretion of the consumers. Then, where is the need for a time-bound action plan for replacement of existing meters with prepaid smart meters? SPDCL has replied that compliance report has been submitted to the Hon'ble Commission vide letter dated 9.6.2022. What are the details of the compliance report? NPDCL has explained that "As per the Gazette notification by the Central Electricity Authority (CEA), Ministry of Power Dt:17.08.2021 it is mandatory that all the existing meters (other than</p>	<p>AT & C losses of TSNPDCL : FY 2020-21 is 9.03%. FY 2021-22 is 13.11%.</p>

Agriculture Consumers) are to be replaced with Prepaid Smart Meters with the following timelines. All electrical Divisions having more than 50% consumers in Urban areas with AT&C losses more than 15% in FY 2019-20, other electrical Divisions with AT&C losses more than 25% in FY 2019-20, all Govt. offices at Block level and above and all Industrial and Commercial consumers shall be metered with Smart meters working in pre-payment mode by December 2023. All other areas shall be metered with Smart meters working in pre-payment mode by March 2025. Accordingly, a draft DPR for Smart Prepaid Metering for all existing consumers (excluding Agriculture Consumers) and System Metering under RDSS has been prepared for an amount of Rs.3183.98 Cr. which is to be approved by Distribution Reforms Committee (DRC) and also by the Telangana State Cabinet in order to obtain final approval by MOP, Gol. b) The Govt. of India launched the Revamped Distribution Sector Scheme (RDSS) on Dt.29.07.2021, with an objective to reduce the AT&C losses to 12-15% (PAN India) and ACS-ARR gap to Zero. The scheme consists of two components — Metering and Distribution Infrastructure Works. As per RDSS guidelines the Gol grant for metering is Rs.900/- per meter. If Prepaid Smart Metering is taken up under RDS Scheme, the approximate cost of Rs.457.60 Cr., for the existing 50,84,524 consumers (other than AGL Consumers) in TSNPDCL as proposed in the DPR will be disbursed as Gol grant to the Discom by MoP. If TSNPDCL does not participate in RDS Scheme, the above amount i.e., Rs.900/per meter is to be borne by the Discom funds and the approximate financial commitment is Rs.457.60 cr.” What are the percentages of AT&C losses of TS DISCOMs? What would be the cost for prepaid meters required by TSSPDCL and their annual maintenance cost, once installed?

We request the Hon'ble Commission to consider the following points, among

The comments are against the policies of Gol. TS Discoms shall

<p>others:</p> <p>A. This move is to be seen in the background of the so-called reforms being imposed on the states by the Modi government for privatising power sector, and in conjunction especially with privatisation of power distribution and implementation of the direct benefit transfer (DBT) scheme. Implementation of RDSS, including installation of pre-paid meters, is to benefit the private operators, who will be permitted to take up power distribution in areas of their choice, as proposed by the Gol.</p> <p>B. It is obvious that, the purpose of installing pre-paid meters is to force the consumers of power to pay in advance for power to be consumed by them, contrary to the standard practice over the decades of paying power bills monthly/bi-monthly for the power consumed by them. What is wrong with the present post-paid arrangement and what is the benefit and to whom with pre-paid arrangement under the proposed smart meters is left unexplained by its sponsors.</p> <p>C. As proposed by the Gol, private operators will be permitted to use the existing transmission and distribution networks of the DISCOMs of the government, paying some nominal rentals for carrying on their distribution business. In other words, they need not invest the amounts required for establishing their own distribution network, make arrangements for its maintenance, etc.</p> <p>D. Allowing private operators to use distribution network of the DISCOMs or rather, forcing the DISCOMs to allow private operators to</p>	<p>abide by the directions given by the Hon'ble TSERC</p>
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use their network on lease, with DISCOMs themselves maintaining the network, is nothing but forcing the latter to lose a considerable part of their business, especially cross-subsidising component, to private operators, who get the opportunity to cherry-picking. Will the Gol apply this Tuglaquian approach to allow utilisation of such networks of private companies in this manner, for example, utilising the network of private telecom companies by others?

- E. The protagonists of pre-paid meters are arguing that pre-paid arrangement is there for cell phones. Then, why not similar arrangement for power consumption also, they ask. First, there is post-paid arrangement for cell phones and landlines. Second, under pre-paid arrangement for a specific period, there is no limit on number of calls that can be made. In the case of power consumption, consumers have to pay for the entire power they consume in a month; they are not allowed to consume any number of units of power during a specified period, pre-paying a specified amount.
- F. The DISCOMs have a grace period of one month to pay bills to generators/suppliers of power for the power supplied by them and even rebate if they pay before the grace period. Under the existing arrangement, consumers are being given a period of 14 days from the date of issuing the bill for paying their bills for power consumed by them in a month. If payment of monthly bill is delayed, exceeding the due date, penalty is being collected by the DISCOMs, besides disconnecting the service. Moreover, all the permissible expenditure and return on equity for supplying power to consumers from the point of generation to end point is being passed through in the form

of tariffs to be paid by the consumers. When such is the case, why should the consumers be forced to pay in advance for power to be consumed by them under the arrangement of pre-paid meters?

G. As per applicable Regulation, "security deposit amount shall be two months charges in case of monthly billing and 3 months charges for bi-monthly billing." In addition to collecting such a security deposit from the consumers, the DISCOMs also are collecting additional security deposit whenever the consumers exceed their contracted load. Then why should the consumers be forced to pay in advance for power to be consumed by them under the arrangement of pre-paid meters?

H. Payment in advance for power to be consumed by the consumers is nothing but providing investment for private distribution company to purchase of power. Private distribution companies need not take loans for their working capital and they can retain the amount paid in advance by the consumers and use as they like till they have to pay for power purchased by them from generators/suppliers. In other words, private operators of distribution need not invest any amounts for developing and maintaining distribution network and for purchasing power. Arrangement of pre-paid meters is intended for bestowing this undue benefit to private operators.

I. The works proposed to be taken up under RDSS need to be, and are being, taken up by the DISCOMs as a part and parcel of expanding, strengthening and maintaining their distribution network. For that no conditionalities, as imposed under RDSS, are required. The grant

component under RDSS is a ruse to impose conditionalities like installation of pre-paid meters to ensure undue benefits to private operators of distribution of power.

- J. Whatever money the DISCOMs spend for purchasing and installing pre-paid meters is nothing but squandering public money, whether it is collected from the consumers concerned or spent from the grant under RDSS. The consumers have already spent their money for their existing meters. Forcing them to pay for pre-paid meters is nothing but imposing additional burden on them without any benefit to them.
- K. The scheme of pre-paid meters benefits their manufacturers. Experience in power sector, as elsewhere in other sectors, shows that terms and conditions of bidding can be manipulated to select bidders of their choice by the powers-that-be. Bidding procedures and terms and conditions issued by the GoI have been found to be wanting in ensuring transparency and fair play, going by the way crony capitalism is being promoted and pampered. It is reported that crony capitalists, who have been promoted and pampered by the GoI, have already entered into manufacturing of pre-paid meters.
- L. There will be practical problems to consumers for paying in advance for power to be consumed by them under the system of pre-paid meters. How much amount and how many times they have to pay in a month, keeping track of their consumption recorded in the pre-paid meter to avoid disconnection and mode of such payment will be problematic to the consumers.

	<p>M. Under smart pre-paid meter, if a consumer does not pay after the existing balance exhausts, his service connection will be disconnected automatically. If a consumer does not pay power bill before due date under the existing post-paid arrangement, his service will be disconnected. The DISCOMs are unable to disconnect service connections of offices of the government and its instrumentalities and local bodies, whatever be the reasons. Even under pre-paid meter system, there is no guarantee that the DISCOMs would not come under pressure not to disconnect services of offices of the government, its instrumentalities and local bodies for their default in paying power bills. It is ironical that, when the GoTS is failing in getting power bills paid by its offices, its instrumentalities and local bodies in time and itself failing in paying the committed subsidy to the DISCOMs in time, it is decided to install pre-paid meters to service connections of power consumers.</p> <p>N. When the GoTS is vehemently and rightly opposing the direction of the GoI for installing meters to all agricultural service connections, why are the DISCOMs moving in the direction of installing pre-paid smart meters to non-agricultural service connections?</p> <p>O. We request the Hon'ble Commission to examine the above-mentioned submissions, among others, and responses of the DISCOMs thereto and direct them not to proceed with implementation of installation of pre-paid meters to service connections of consumers of power in the state.</p>	
17.	We request the Hon'ble Commission to permit us to make further submissions, including on true-up claims of the DISCOMs before the due date	No Comment

	and during public hearings on the subject issues, after receiving and studying responses of the DISCOMS.	
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Replies to the Objections/Suggestions raised on ARR & FPT for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 by Sri M. Venugopal Rao, Senior Journalist & Convener, Centre for Power Studies, H.No.1-100mp/101 Monarch Prestige, Journalist's Colony, Serilingampally Mandal, Hyderabad -500032 (Set-2)

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	<p>Both the TS DISCOMs have made claims for true up of Rs.12753.56 crores - SPDCL for Rs.9060.80 crore and NPDCL for Rs.3692.76 crores - for seven years 2016-17, 2017-18, 2018-19, 2019-20, 2020-21, 2021-22 and provisional true up for 2022-23 for their retail supply business, after adjusting the amounts shown under true-down. This net true up is after GoTS providing Rs.15,976.80 crore for both the DISCOMs – Rs.7960.89 crore towards additional support and Rs.8015.91 crore towards loss funding. The DISCOMs have not explained what these “additional support” and “loss funding” are. For the years 2021-22 and 2022-23, GoTS has not provided any additional support and loss funding. In their ARR and tariff proposals for the year 2022-23, the DISCOMs have shown an accumulated revenue deficit of Rs.36847.63 crore. It can be presumed that this accumulated revenue deficit is after adjusting additional support and loss funding claimed to have been provided by the GoTS. Even after adjusting the true-up claims of the DISCOMs for a hefty sum of Rs.12753.56 crore, the net revenue deficit would be Rs.24,094.07 crore. What are the components of this accumulated revenue gap? Are they dues to be collected from different categories of consumers, subsidy to be provided by GoTS, loans taken for non-capital expenditure, including for paying monthly salaries, or under any other heads? What is the accumulated revenue gap of both the DISCOMs as of now and under what heads? What do the DISCOMs propose to bridge the accumulated revenue gap?</p>	<p>TS Discoms have made true up claims for their Retail Supply Business after adjusting the amounts received from GoTS and the year wise details of such amounts are already provided in the filings. As per the UDAY Agreement, the total outstanding debt as on 30.09.2015 has to be taken over by the GoTS and GoTS has taken over the same in the form of equity infusion i.e., additional support. Further, as per UDAY MoU, States have to take over the future losses in a progressive manner and accordingly GoTS has taken over the losses for the period from FY 2016-17 to FY 2020-21.</p> <p>The accumulated revenue deficit of Rs. 36847.63 Crore as referred by the Objector is actually Rs. 36841.63 Crore and was sum of yearly revenue deficits from FY 2018-19 to FY 2021-22 as submitted by the TS Discoms in the Retail Supply ARR filings for FY 2022-23 in Form 9 of RSF formats (namely ‘Revenue Deficit/Surplus and Proposed Adjustments’). The yearly revenue deficits were including estimated figures for FY 2021-22 and does not include the additional support and loss funding provided by the GoTS.</p> <p>The year wise revenue deficit is the difference of ARR and Revenue from various sources. TS Discoms have already filed Petitions for Distribution True up and the proceedings are undergoing along with the instant ARR and Retail Supply True up filings.</p>

2	<p>The substantial growth in generation capacity added, transmission and distribution network expanded and strengthened and increasing per capita consumption of power, after formation of the state of Telangana notwithstanding, this precarious financial situation shows the kind of crisis into which TS DISCOMs have been plunged. Since the DISCOMs have not proposed any tariff hike for the year 2023-24, obviously, at the behest of the GoTS, keeping in view pre-election period, the projected revenue gap of Rs.10535.00 crore for the year 2023-24, is supposed to be bridged, by implication, with subsidy to be provided by the GoTS. In the background of this abnormal accumulated revenue gap, imposition of an abnormal additional burden of Rs.6078.73 crore under tariff hikes for the year 2022-23, projected revenue gap of Rs.10535 crore for 2023-24, true-up claims for retail supply business for a period of seven years of Rs. 12753.56 crores, and true-up claims of the DISCOMs for their distribution business of Rs.4092.23 crores already pending before the Hon'ble Commission for its consideration with public hearing on the same concluded, one has to understand the seemingly irretrievable financial chaos into which the power sector in the state has been plunged. Ever-increasing burdens on consumers of power in terms of tariff hikes, true-up claims and other items like collection of additional developmental charges, substantial subsidy, additional support and loss funding being provided by the GoTS, and abnormal revenue gaps getting accumulated reflect utter mismanagement of the power sector in the state, notwithstanding a chief minister, who assumes airs of omniscience, and financial wizards and technical and engineering experts heading the power utilities of the GoTS steering it. The anarchy of keeping TSERC defunct for a period of nearly one year, by keeping the posts of Chairman and Members vacant, non-submission of ARR and tariff proposals for a period of three consecutive years ending</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"> • GoTS has started releasing LIS CC charges by providing budgetary support from 2021. This will improve collection efficiency and eventually reduce AT&C losses • GoTS has instructed Panchayat Raj and Municipal administration to pay CC charges as per vide Lr. No. 768, dt. 14.08.2020. • From FY 2020-21 onwards, TS Discoms are receiving regular monthly advance payments of subsidy. <p>Further benefits to SC & ST consumers for domestic use, Haircutting salons, Dobhighats, Laundry shops, powerlooms, poultry farms and spinning mills.</p>
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	<p>2021-22, deficiencies and inefficiencies in the functioning of the power utilities of the government, including non-collection of dues of power bills of the consumers, both governmental and non-governmental, and the kind of regulatory exercises being undertaken by the Commission, to some extent, have added to the crisis. Above all, it is the pro-corporate and anti-people policies and reforms being imposed by the Modi government on the states, without itself taking any responsibility and accountability for the disastrous consequences that have been arising as a result of implementing its diktats, that have been responsible for the irretrievable crisis the power sector finds itself in, as already explained in our earlier submissions on the subject issues and submissions made on ARR and tariff proposals of the TS DISCOMs for the year 2022-23 and during various public hearings being conducted by the Hon'ble TSERC. All the claims of the Bharat Rashtra Samithi government on strengthening and expanding generation, transmission and distribution networks in the state, ensuring continuous supply of power to consumers, free supply of power to agriculture throughout the year, limited free supply of power to some of the categories of consumers and subsidised supply to some of the other consumers cannot hide, much less justify, the kind of disastrous situation the power sector in the state finds itself in.</p>	
3	<p>For the year 2022-23, the TS DISCOMs have shown that energy dispatched would be 74075 MU against 78274 MU approved by the Commission. Though the energy dispatch is estimated to come down by 4199 MU or 5.36%, the cost of power purchase is estimated to increase from Rs.35153 crore approved by the Commission to Rs.36035 crore. It works out to an increase by Rs.882 crore or 2.51%. With decrease in dispatch of energy, the overall cost of power purchase should have come down. Though fixed cost for purchasing the power is projected to come down from Rs.14376</p>	<p>The main purpose of TS Discoms regarding purchase of power is to supply quality and reliable power to all the consumers and to ensure the policy of 24 x 7 supply to all categories of consumers.</p> <p>Based on the demand and availability in particular 15-minute time block, the Discoms have to procure power from markets if the availability in that particular time block doesn't meet the requirement. During H1 of FY 2022-23, the</p>

	crore approved by the Commission to Rs.12467 crore, due to reduction in quantum of power purchased, variable cost is estimated to increase from Rs.20759 crore approved by the Commission to Rs.23413 crore. The following points, among others, need to be examined:	market rates were higher due to shortage of coal and due to importing of coal as per MoP guidelines. In addition to the above, there was also change in variable cost of Sembcorp due to "Change in Law" (as mentioned in section 9 of the initial responses).
3.a	The DISCOMs have explained that variable cost is increasing due to increase in cost of coal, freight charges, royalty and levy of green cess, without giving details of when such increases have taken place and the extent of their impact on variable costs	
3.b	For the fixed cost of Rs.1331 crore, the DISCOMs could get 5443 MU instead of 3719 MU from the hydel projects of APGENCO	TS Discoms have estimated the availability from Hydel projects as 5443 MU in FY 2022-23 for the fixed cost of Rs. 1331 crore. TS Discoms cannot comment on the availability projections of AP Genco Hydel.
3.c	Though the DISCOMs have projected market purchases to increase from 2172 MU approved by the Commission to 4481 MU, with an estimated increase in variable cost from Rs.716 crore to Rs.2948 crore, they have not given details such purchases source-wise and price-wise. Price of market purchases is estimated to increase from Rs.3.29 per unit estimated by the Commission to Rs.6.58 per unit. It is not made clear whether the DISCOMs have obtained prior consent of the Hon'ble Commission to purchase additional power from the market at higher prices.	There are no purchases from short-term bilaterals (like PTC, etc.) during FY 2022-23 and FY 2023-24. Discoms purchased from exchange market only during the time-blocks when there is deficit in power requirement. Since the whole process of purchasing power from exchange is a collective transaction the source wise data is not available. The month-wise short-term purchases from market (quantum and amount) by TS Discoms were already submitted in their petitions in the prescribed RSF formats.
3.d	The DISCOMs have shown miscellaneous cost of Rs.105 crore, without giving details thereof	TS Discoms have already provided the details of the expenses against which the same have been claimed under "Other Costs" section in power purchase in their respective petitions (Section 4.1.13 in TSSPDCL petition and section 5.1.13 in TSNPDCL petition).
3.e	The DISCOMs have shown that the cost of power purchase would increase to Rs.41,066 crore, including distribution losses approved and transmission	TS Discoms have claimed the TS Transco charges for FY 2022-23 as per the TS Transco MYT Order for 4 th Control Period.

	<p>charges. They have not given details of the transmission charges and inter-state transmission charges to be paid to PGCIL source-wise. They have also not given details of amounts reimbursed or to be reimbursed by TS TRANSCO and PGCIL for the increase in market purchases made by the DISCOMs.</p>	<p>As regards to inter-state charges, TS Discoms have considered the actual PGCIL charges paid for H1 FY 2022-23 and the average of PGCIL rates for the months of April 2022 to October 2022 as available in the SRPC website were considered for H2 FY 2022-23. This rate along with the projected capacities for CGS stations, Sembcorp Energy (Units I, II) and CSPDCL has formed the basis for calculating PGCIL (POC) charges for H2 FY 2022-23.</p> <p>Other PGCIL charges (STOA charges) paid as a result of procuring power from IEX, has also been considered based on the actuals of H1 FY 2022-23.</p> <p>For H1 FY 2022-23, the actual PGCIL (Non-POC) charges and SRLDC charges & fees, have been considered and the projections for H2 FY 2022- 23 have been done in line with the FY 2021-22 and H1 FY 2022- 23 actuals.</p> <p>An amount of Rs.47.03 Crs has been reimbursed by PGCIL to TSDISCOMs towards STOA credits for the FY 2022-23 (upto Jan,2023)..</p>
3.f	<p>Though the DISCOMs have maintained that the actual energy dispatched for 2022-23 would be 6% higher than previous year and is following a similar trend of the previous years, viz., 2019-20, 2020-21 and 2021-22, it is obvious that growth rate in demand for power for 2022-23 is overestimated. Though the DISCOMs have maintained that the reduction in dispatch is due to the lower sales recorded in H1 of FY 2022-23, especially in HT IV lift irrigation schemes category, the details of the same are not given.</p>	<p>The month-wise actual sales for H1 of FY 2022-23 and the projected sales for H2 of FY 2022-23 for all the categories (including HT IV LIS) have already been submitted by TS Discoms in the prescribed RSF formats.</p>
4	<p>The DISCOMs have submitted that inter-state sale of surplus power is estimated to be 1674 MU against 5060 MU approved by the Commission and the total variable cost would be Rs.1141 crore against Rs.1619 crore</p>	<p>The quantum of power sold by TS Discoms i.e., 1674 MU is for the first half of FY 2022-23 (Apr'22 to Sept'22).</p> <p>TS Discoms shall engage in the sale of surplus power in various time blocks based on the real time market scenario i.e., only if</p>

	<p>estimated by the Commission. While inter-state sale of surplus power is estimated to be lesser by 66.91%, the estimated revenue from variable cost is estimated to be lesser by 29.52%. Even in a situation of scarcity for power and prices of power in the market and through power exchanges tending to be very high due to artificial scarcity for domestic coal created and import and utilisation of costly imported coal forced on thermal power plants by the Modi government, that the inter-state sale of surplus power by TS DISCOMs is estimated to be lesser by 66.91% shows that most of the surplus power available has been during off-peak hours and cannot be sold in the market</p>	<p>the market conditions are favourable to TS Discoms</p>
5	<p>The DISCOMs have not given revised estimation of availability of surplus power and fixed charges to be paid for backing down the same during 2022-23. Moreover, this situation underlines imbalance between power mix and fluctuating demand curve, even after making a provision for availability of surplus power due to technical constraints in the present power system. The DISCOMs have not given details of thermal power being backed down in order to purchase must-run RE and NCE and the fixed charges being paid for such a backing down</p>	<p>TS Discoms submitted the information as per the prescribed filing formats by TSERC and writeups. TS Discoms shall abide by the instructions of the Hon'bleCommission for submission of any additional information, asrequired.</p>
6	<p>The benefits of lesser purchase of power and higher availability of hydel power, have been eroded substantially due to higher purchases in the market at higher prices and paying transmission charges to TS TRANSCO and PGCIL for the contracted capacities remaining under-utilised. While TSNPDCL has sought a true-down of Rs.369.10 crore, TSSPDCL has sought a true-up of Rs.1270.39 crore provisionally for the year 2022-23. This proposed burden on the consumers has to be seen in the background of the burden of Rs.6078.73 crore imposed on the consumers under tariff hikes for the year 2022-23. In the absence of required details, it is not</p>	<p>Everyday 15 minutes Time-Block Scheduling of power from all the available sources is being done based on merit order and any shortage of power due to sudden outages of plants, increase in Demand etc. is being purchased through Power exchanges considering the requirement in each 15 minutes Time-Block.</p> <p>Procurement of power under Short-term (Power Exchanges) considering power shortages in certain Time-Blocks is inevitable to bridge the Day to Day Demand- Supply gap.</p> <p>During the H1 of FY 2022-23, the market prices were high due</p>

	possible to ascertain veracity and permissibility or otherwise of the claims of the TS DISCOMs, especially of SPDCL for its claims for provisional true-up for 2022-23.	to the coal shortages in the country.
7	In their ARR submissions for 2023-24, the DISCOMs have not explained as to why net availability from Chattisgarh Power Distribution Company Limited (CSPDCL) has been so low at a PLF of 19% for 2021-22, 31% PLF for 2022-23 and how is it projected to be 78% PLF for 2023-24. In response to the queries of the Hon'ble Commission, TSSPDCL has submitted that the actual power purchased by TSDISCOMs from CSPDCL for FY 2021-22 is 1631 MU(availability of 19%) and for H1 2022-23 zero. However, for H2 of FY 2022-23, the estimated power purchase is shown as 2713 MU (31%), under the assumption that the disputes will be resolved by then. A quantum of 6825 MU (78%) is projected for 2023-24. The Hon'ble Commission has directed that - "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." The TSSPDCL has explained that, against the lesser availability of power declared by CSPDCL to TSDISCOMs for 2020-21 (39.67%) and for 2021-22 (19.71%), with claims of fixed charges of Rs.828.31 crore and Rs.394.98 crore, respectively, letter 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 14.2.2017 and not 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. The DISICOM has further informed that, TSDISCOMs informed CSPDCL, at a high level	At present, Captive Coal Mine (located at Chhattisgarh) has been allotted to Marwa plant, Chhattisgarh. Thereby the tariff of plant has been reduced further and TSDISCOMs persuing with CSPDCL to resolve the disputes in order to schedule power from Marwa plant. With regard to the POC charges, it is to inform that the transmission capacity booked for Chhattisgarh is being utilized/adjusted to procure power through exchange and banking facilities. Further, TSDISCOMs filed petition against PGCIL on levy of relinquishment charges for the additional 1000 MW transmission capacity and the same is pending.

meeting held on 4th and 5th October, 2021, 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 dated 31.3.2017) "in a phased manner." While TS DISCOMs maintained that the difference in the outstanding amount as per their claims and those of CSPDCL needs to be clarified and reconciled subject to outcome of the appeal pending before APTEL/TSERC. In its invoice dated 23.9.2022, CSPDCL has claimed Rs.3576.89 crore pending upto 3.6.2022 under LPS Rules-2022, and TSDISCOMs in their letter dated 11.10.2022 have informed CSPDCL that Rs.2100 crore of dues have been considered by them under LPS rules-2022. TSSPDCL have explained that, "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 1000 MW 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." In other words, till the issues pending before APTEL/TSERC are resolved, in favour of, or against, TS DISCOMS (with scope for further appeals), even if CSPDCL does not supply power contracted, TSDISCOMs do not seem to be capable of doing anything, except "facing huge financial loss by way of additional market purchase and by way of payment of POC charges to CTU for the full contracted capacity." When this issue came for public hearing, GoTS, the DISCOMs and the then TSERC did not pay heed to the objections raised and suggestions made by objectors, including this objector, cautioning about the serious risks involved on a long-term basis in entering into an agreement with CSPDCL in the manner proposed and submitted to TSERC. Unable to wriggle out of their predicament, the

	DISCOMs have been forced to resort to legal recourse against the adverse consequences that have been arising as a result of the imprudent manner in which the entire transaction took place, because of, or despite, the direct involvement of the Hon'ble Chief Minister in the issue. How much was the penalty paid by the DISCOMs to the CTU for cancelling the additional 1000 MW transmission capacity contracted by them and under what head the DISCOMs have shown the penalty amount?	
8	The annexures claimed to have been submitted by TSSPDCL along with its additional information to the Hon'ble Commission are not available in the web site of the latter. Nor are they available on the web site of TSSPDCL	The issue is not pertains to TSNPDCL
9	The Hon'ble Commission has issued Regulation No.1 of 2023 - Third Amendment to (Terms and Conditions for Determination of Tariff for Wheeling and Retail Sale of Electricity) Regulation No.4 of 2005. Though it is a matter relating to tariffs to be paid by the consumers, the Hon'ble Commission has simply invited suggestions and objections from interested public to the draft uploaded in its website, has not held any public hearing, despite requests made by objectors, and has issued the amended regulation, without making objections/suggestions of the objectors and the responses of the Commission to the same public, as if the regulatory process pertaining to the issue were a mere formality, without ensuring transparency, accountability and public participation. Generally, regulations and amendments thereto are being issued by the ERCs after holding public hearings.	The comment/ suggestion is under the purview of Hon'ble Commission as it is directed towards them.
10	The mechanical approach with which the DISCOMs are permitted to levy a maximum amount of FCA charges of Rs.0.30 per unit (in kWh) on the consumers as per Regulation No.1 of 2023 under FSA-FCA, without the prior approval of the Commission, and treating cost of power purchase as	TS Discoms submit that the FCA mechanism aims to recover/refund the variation in the actual fuel costs from the approved fuel costs and the parameters used in FCA formulae are defined to avoid pass through of any higher costs. Further,

	<p>“uncontrollable” is too sweeping. With this amendment, monthly additional burdens are going to be imposed on the consumers, with scope for true-down being a very rare</p>	<p>the FCA claims are subject to quarterly check and annual true up of TS Discoms.</p>
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2023-24 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదనలు & క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనలు మరియు ట్రా-అప్ చార్జీలు పై సారంపత్రి మల్లా , అఖిల భారత కిసాన్ సభ నాయకులు, హైదరాబాద్ గారి సూచనలు/సలహాలకు సమాదానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాదానాలు																				
1.	<p>2023-24 వార్షిక సంవత్సరానికి డిస్కంలు ఆదాయ వ్యయాలను ప్రవేశపెట్టాయి. రానున్న వార్షిక సంవత్సరం లో రూ. 10,535 కోట్లు లోటు ఆదాయం చూపుతూ ప్రతిపాదనలు రెగ్యులేటరీ కమిషన్ కు ఇచ్చారు. ఈ లోటు భర్తీ చేయడానికి ఎలాంటి ప్రతిపాదనలు చేయలేదు. వారు ప్రతిపాదించిన ఆదాయాలు ఈ విధంగా ఉన్నాయి.</p> <table border="1" data-bbox="235 893 989 1352"> <tr> <td>రూ. కోట్లలో</td> <td></td> <td></td> <td></td> </tr> <tr> <td>డిస్కం లోటు</td> <td>కావాల్సిన ఆదాయం</td> <td>టారిఫ్ ద్వారా వచ్చే ఆదాయం</td> <td></td> </tr> <tr> <td>ఎస్పీడిసీఎల్</td> <td>36,963</td> <td>33,521.34</td> <td>3211</td> </tr> <tr> <td>ఎన్సిడిసిఎల్</td> <td>17,096</td> <td>9737</td> <td>7324</td> </tr> <tr> <td>మొత్తం</td> <td>53,059</td> <td>43,259</td> <td>10,535</td> </tr> </table>	రూ. కోట్లలో				డిస్కం లోటు	కావాల్సిన ఆదాయం	టారిఫ్ ద్వారా వచ్చే ఆదాయం		ఎస్పీడిసీఎల్	36,963	33,521.34	3211	ఎన్సిడిసిఎల్	17,096	9737	7324	మొత్తం	53,059	43,259	10,535	<p>గౌరవ కమిషన్ వారు జారీ చేసిన ఆర్థిక సంవత్సరం 2022-23 టారిఫ్ ఆర్డర్ ధరల ప్రకారం, ఆర్థిక సంవత్సరం 2023-24 సంవత్సరానికి ధరల పెంపుదల లేకుండా అంచనా వేసిన ఆదాయం తరువాత NPDCL లోటు రూ.7,324 కోట్లు గాప్రభుత్వ సబ్సిడీ కాకుండా 2023-24 సంవత్సరానికి అంచనా వేయడమైనది. ఈ లోటును డిస్కం అంతర్గత సామర్థ్యం మరియు అదనపు ప్రభుత్వ సహాయం ద్వారా భర్తీ చేసుకోవడం జరుగుతుంది.</p> <p>ఈ విషయము పై గౌరవ కమిషన్ వారు అంతిమంగా నిర్ణయం తీసుకుంటారు.</p> <p>డిస్కంలు ఆర్థిక సంవత్సరం 2018-19 వరకు ప్రతి సంవత్సరం సమగ్ర ఆదాయ ఆవశ్యకత నివేదికలను సమర్పించడం జరిగినది. కానీ ఆర్థిక సంవత్సరం 2019-20 నుండి ఆర్థిక సంవత్సరం 2021-22 సంవత్సరాలకు సంబంధించిన సమగ్ర ఆదాయ ఆవశ్యకత మరియు ప్రతిపాదిత ధరల నివేదికలను తెలంగాణ అసెంబ్లీ ఎన్నికలు 2018 నియమావళి, లోక సభ ఎన్నికలు 2019 నియమావళి, నీటిపారుదల & CAD శాఖ ద్వారా ఎత్తిపోతల పథకాలకు కావలసిన డిమాండును, వినియోగాన్ని అంచనా వేయడం లో జాప్యము వలన, వార్షిక ఖాతాలు (Annual Accounts) సకాలంలో పూర్తి చేయక పోవడం వలన, మున్సిపల్ ఎన్నికల నియమావళి వలన, కేంద్ర విద్యుత్ మంత్రిత్వ శాఖ వారి ధరల హేతుబద్ధీకరణ</p>
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ఎన్సిడిసిఎల్	17,096	9737	7324																			
మొత్తం	53,059	43,259	10,535																			

<p>ఈ లోటును భర్తీ చేయడానికి ఎలాంటి ప్రతిపాదనలు లేనందున రానున్న కాలం లో "ట్రూఅప్" పేరు తో భారాలు మోపడానికి డిస్కాం లు ప్రయత్నం చేస్తాయి. రాష్ట్ర ప్రభుత్వం ఇవ్వాలి సబ్సిడీ లు కూడా ఈ ప్రతిపాదన లో చూపలేదు.</p> <p>2022 -23 సంవత్సరం రూ. 6078 .73 కోట్లు టారిఫ్ రేట్లు పెంచారు. ప్రభుత్వ సబ్సిడీ ఉన్నప్పటికీ కొంత లోటు చూపించారు.</p> <p>- 2022 -23 సంవత్సరానికి లోటు రూ. 4097 .28 కోట్లు చూపారు.</p> <p>- ప్రభుత్వ సబ్సిడీ రూ. 5651 .65 కోట్లు ఇచ్చిన్నప్పటికీ లోటు చూపారు.</p> <p>2023 -24 సంవత్సరానికి ప్రతిపాదనలో కూడా ప్రభుత్వ సబ్సిడీ , లోటు బడ్జెట్ పూడ్చుకోవడానికి గౌరవ రెగ్యులేటరీ కమీషన్ డిస్కాంలకు సూచనలు చేయాలి. డిస్కాంలు ఏటా లోటు బడ్జెట్లను చూపుతూ రుణగ్రస్తులు అవుతున్నారు. 2018 నుండి 2022 వరకు డిస్కాంలు ప్రతిపాదనలే రెగ్యులేటరీ కమీషన్ కు ఇవ్వలేదు. పాత టారిఫ్ రేట్లనే అమలు జరిపారు. ఆ విధంగా డిస్కాంలు పెద్ద</p>	<p>చేయడానికి, -19 లాక్-డౌన్ వలన మరియు GHMC ఎన్నికల నియమావళి వలన సకాలంలో సమగ్ర ఆదాయ ఆవశ్యకత నివేదికలను సమర్పించ లేదు.</p> <p>ఏది ఏమైనప్పటికీ 31.03.2021 రోజున ఆర్థిక సంవత్సరం 2019-20 నుండి ఆర్థిక సంవత్సరం 2021-22 వరకు 3 సంవత్సరాల సమగ్ర ఆదాయ ఆవశ్యకత నివేదికలను గౌరవ కమీషన్ వారికి సమర్పించడం జరిగినది. కానీ ప్రతిపాదిత ధరల నివేదికలను సమర్పించని కారణంగా నివేదికలను గౌరవ కమీషన్ వారు తిరస్కరించారు.</p> <p>తెలంగాణ డిస్కంలు పంపిణీ వ్యాపారం యొక్క ట్రూ-అప్ 1వ, 2వ & 3వ నియంత్రణ కాలాలకు గాను(FY 2006-07 to 2018-19) మరియు వార్షిక పనితీరు సమీక్ష (Annual Performance Review) ఆర్థిక సంవత్సరం 2019-20 మరియు 2020-21 సంవత్సరాలకుగాను మరియు రిటైల్ సరఫరా వ్యాపారం యొక్క ట్రూ-అప్ ఆర్థిక సంవత్సరం 2016-17 నుండి ఆర్థిక సంవత్సరం 2022-23(తాత్కాలిక) సంవత్సరాలకుగాను గౌరవ కమీషన్ వారికి సమర్పించడం జరిగినది.</p> <p>గౌరవ కమీషన్ వారు జారీ చేసిన రెగ్యులేషన్ నం. 04 /2013 ప్రకారం డెవలపుమెంట్ చార్జీలను వినియోగదారు తాను తీసుకున్న లోడ్ కంటే అదనపు లోడు వాడుకుంటే, ఒక నెల Bill-cum-Notice ఇచ్చిన తర్వాతనే ఆ అదనపు లోడు డెవలపుమెంట్ చార్జీలను వసూలు చేయడం జరుగుతున్నది మరియు గౌరవనీయమైన విద్యుత్ నియంత్రణ మండలి TSERC రెగ్యులేషన్ నెం.6(2004) ప్రకారం అదనపు సెక్యూరిటీ డిపాజిట్ (ACD) వినియోగదారుడు వాడుకున్న అదనపు లోడును బట్టి (ACD) నిర్ణయించడం జరగదు.</p>
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<p>ఎత్తు న లోటును చూపాయి</p> <ul style="list-style-type: none"> - గత 4 సంవత్సరాల బకాయిలు - 2018 -19 రూ. 10,232 .74 కోట్లు - 2019 -20 రూ. 7,317 .29 కోట్లు . - 2020 -21 రూ. 8666 .76 కోట్లు -2021 -22 రూ. 10,624 .84 కోట్లు - మొత్తం రూ. 36,841 .63 కోట్లు <p>ఈ లోటు ను పూడ్చడానికి 2022 -23 సంవత్సరం ప్రతిపాదనలో ఎలాంటి సూచనలు లేవు.</p> <p>ఈ కాలం లో 1 . డెవలప్మెంట్ ఛార్జీలు . 2 . ఎసిడి(అడిషనల్ కన్స్టంప్షన్ డిపాజిట్) పేర కోట్ల రూపాయలు డిస్కౌంట్లు వసూలు చేశాయి. దీనికి రెగ్యులేటరీ కమీషన్ అనుమతి లేదు.ఎలాంటి బహిరంగ విచారణ జరప లేదు.</p>	<p>వినియోగదారుడు గత సంవత్సరము వినియోగించిన రెండు నెలల సగటు విద్యుత్ వినియోగ యూనిట్లకు సమానంగా సెక్యూరిటీ డిపాజిట్ను విద్యుత్ సంస్థ వద్ద నిల్వ ఉంచాలి. ప్రస్తుత బిల్లింగ్ విధానము ప్రకారంగా వినియోగదారుడు వినియోగించిన నెల తరువాత బిల్లు జారీ చేయడము అవుతున్నది మరియు బిల్లు జారీ చేసిన తరువాత 30 రోజుల లోపు బిల్లు చెల్లించడానికి వెసలు బాటు కలదు అనగా మొత్తం రెండు నెలల తర్వాత మాత్రమే వినియోగదారుడు తాను వినియోగించుకున్న విద్యుత్ కు ఛార్జీలను డిస్కం కు చెలిస్తున్నాడు</p> <p>కావున ఒక సంవత్సరంలో విద్యుత్ వినియోగదారుడు వారి సర్వీస్ పై వాస్తవంగా ఉండవలసిన సెక్యూరిటీ డిపాజిట్ ను 2 నెలల సగటు వినియోగ యూనిట్ల ఆధారంగా లెక్కించి నుంచి అంతకు ముందే వారి నూతన సర్వీస్ తీసుకున్నప్పుడు చెల్లించిన డిపాజిట్ ను మరియు అదనపు లోడ్ పెంచినప్పుడు తీసుకున్న సెక్యూరిటీ డిపాజిట్ ను మినహించగా వచ్చిన నికరమొత్తాన్ని అదనపు సెక్యూరిటీ డిపాజిట్ గా (ACD) లెక్కిస్తారు ఇట్టి డిపాజిట్ పై రిజర్వ్ బ్యాంక్ ఆఫ్ ఇండియా నిబంధనల ప్రకారం ప్రతి సంవత్సరం వడ్డీని లెక్కించి నెల బిల్లు లలో సర్దుబాటు చెయ్యడం జరుగుతుంది.</p>
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<p>2</p>	<p>రెగ్యులేటరీ కమీషన్ ప్రకటన :</p> <p>జనవరి 2023 నెలలో రెగ్యులేటరీ కమీషన్ చేసిన ప్రకటన వినియోగదారులపై భారాన్ని మోపుతున్నది. " ప్యూయల్ సర్పార్ట్ బాకీలను" డిస్కం లు ప్రతి రెండు మాసాలకొకసారి ఎలాంటి విచారణ లేకుండా వినియోగదారుల నుండి వసూలు చేసుకోవచ్చని ప్రకటించారు . ఇప్పటికే సరైన గణాంకాలు అనుసరించని డిస్కం లు వినియోగదారులపై "ప్యూయల్ సర్పార్ట్ పేరుతో" అదనపు భారాలు మోపే అవకాశం వుంది.</p>	<p>ఈ మధ్య కాలంలో కేంద్ర ప్రభుత్వ విద్యుత్ మంత్రిత్వ శాఖ వారు జారీ చేసిన ఎలక్ట్రిక్ రూల్స్ 2021 ప్రకారం విద్యుత్ కొనుగోళ్లకు సంబంధించిన వ్యయము లోని వ్యత్యాసాలను 30 రోజులలోపు వినియోగదారు తదుపరి బిల్లు లో కలపాలని చెప్పినారు. ఆ ఆదేశాల ప్రకారం డిస్కాములు గౌరవ కమీషన్ వారిని వినియోగదారుని బిల్లు లో సర్దుబాటు (FSA/FCA) చేయడానికి ఒక ఫార్ములా పొందుపర్చమని కోరడం జరిగినది. తదుపరి కమీషన్ వారు ఇంధన సర్దుబాటు వ్యయానికి సంబంధించి రెగ్యులేషన్ ను జారీ చేసినారు మరియు వాటాదారుల & పబ్లిక్ సలహాలు/సూచనలు పరిగణలోకి తీసుకుని తుది రెగ్యులేషన్ ను 18 -01 -2023 నాడు జారీ చేసినారు. ఆ రెగ్యులేషన్ నం. 01 /2023 ('3' వ సవరణ చేయబడిన రెగ్యులేషన్ నం.04 /2005).</p> <p>ఈ రెగ్యులేషన్ ను 01 -04 -2023 నుండి అమలు చేయటం జరుగుతుంది.</p>
	<p>మిగులు విద్యుత్ అమ్మకం:</p> <p>2023 -24 వార్షిక సంవత్సరానికి 83,113 మిలియన్ యూనిట్లు అవసరమని డిస్కాలు నిర్ణయించాయి. అంతకు మించి విద్యుత్ ఉత్పత్తి అవుతున్నది. 13,441 మిలియన్ యూనిట్లు అదనపు ఉత్పత్తిని డిస్కాలు వినియోగేతరులకు అమ్మాలి . అదనపు విద్యుత్ ను అమ్మడానికి గౌరవ కమీషన్ యూనిట్ కు రూ. 3.20 లు నిర్ణయించింది. అదే కమీషన్ విద్యుత్ కొనుగోలుకు ,</p>	<p>TSERC/CERC/MNRE/MoP జారీ చేసిన వివిధ నిబంధనలు/ఆర్డర్లకు కట్టు బడిఉండటమే కాకుండా, విద్యుత్ చట్టం 2003లో పొందుపరచబడిన ఆదేశాన్ని కూడా అతి తక్కువ ఖర్చుతో నమ్మదగిన విద్యుత్ సరఫరాను నిర్వహించడానికి రెండు బాధ్యతలను రాష్ట్ర డిస్కాలకు అప్పగించారు. తెలంగాణ రాష్ట్రంలో పెరుగుతున్న విద్యుత్ డిమాండ్ను తీర్చడానికి మరియు తెలంగాణ రాష్ట్ర ప్రభుత్వ ఆదేశాల ప్రకారం వ్యవసాయ సర్వీసులతో సహా అన్ని వర్గాల వినియోగదారులకు 24 గంటల నమ్మకమైన విద్యుత్ సరఫరాను నిర్ధారించడానికి, TSDISCOMలు విద్యుత్ సేకరణకు ప్రణాళికలు సిద్ధం చేస్తున్నాయి రాష్ట్రం యొక్క పెరుగుతున్న విద్యుత్ డిమాండ్ కు అనుగుణంగా మరియు రాష్ట్ర ప్రభుత్వం చేపట్టిన ఇరిగేషన్ ప్రాజెక్ట్ లకు</p>

<p>3</p>	<p>డిస్కాం ల కు సగటున రూ. 4 .49 యూనిట్ కు నిర్ణయించింది. అనగా మిగులు విద్యుత్ అమ్మకం లో ప్రతి యూనిట్ కు రూ. 1.29 లు నష్టపోతున్నారు. ఈ అమ్మకాన్ని కొనుగోలు చేసిన ధరకు అమ్మడం ద్వారా వినియోగదారులపై భారాన్ని తగ్గించవచ్చు.</p> <p>సాంప్రదాయ విద్యుత్ వినియోగం: పర్యావరణ పరిరక్షణ పేరుతో ధర్మల్ విద్యుత్ ను తగ్గించి సాంప్రదాయ విద్యుత్ ను వినియోగించాలని కేంద్రం చేసిన సూచనలకు అనుగుణంగా 1.సోలార్,2.గాలి,3.హైడ్రల్ విద్యుత్ ను వినియోగించాలని నిర్ణయిస్తున్నారు</p> <p>2023 -24 లో 11,966 మిలియన్ యూనిట్లు అదనపు లభ్యత ఉంటుందని డిస్కాంలు సూచించాయి. హైడ్రల్ 5,415 మిలియన్ యూనిట్ల లభ్యత ఉంటుంది. విద్యుత్ ఉత్పత్తి చేసే (పవర్ పర్ఫెస్ అగ్రిమెంట్) ద్వారా సోలార్ ఉత్పత్తి కి అదనపు ధర నిర్ణయించి భారాలు వేస్తున్నారు. ధర్మల్ విద్యుత్ ను ఉపసంహరించడం వల్ల వినియోగదారులపై భారాలు పెరుగుతాయి. ఇప్పటికే ధర్మల్ విద్యుత్ కేంద్రాలను అదనంగా స్థాపించాం. అవి విద్యుత్ ను సరఫరా చేస్తున్నాయి.</p>	<p>అవసరమయ్యే అదనపు విద్యుత్ డిమాండ్ను తీర్చడానికి డిస్కాంలు దీర్ఘకాలిక, మధ్యకాలిక మరియు స్వల్పకాలిక విద్యుత్ కొనుగోలు ఒప్పందాలను కుదుర్చుకుంటున్నాయి.</p> <p>మిగులు విద్యుత్ లభ్యత (ARRలో చూపిన విధంగా) స్థిరంగాఉండదు. ఇది అన్ని వనరుల నుండి ఎనర్జీని పరిగణనలోకి తీసుకుంటే, వార్షిక ఏకీకృత మొత్తం లోడ్ డైనమిక్స్పై ఆధారపడి, ఒక రోజులో బ్లా క్షలో మిగులు విద్యుత్ మరియు మరికొన్ని బ్లా క్షలో విద్యుత్ లోటు ఉంటుంది. ఇందుకుగాను TSDISCOMలు డిమాండ్ను తట్టుకోవడానికి మిగులు సమయాల్లో విద్యుత్ విక్రయాన్ని లోటు సమయాల్లో బహిరంగ మార్కెట్ నుండి విద్యుత్ను కొనుగోలు చేయడం చేస్తుంటాయి MoP, GoI ఆదేశాల ప్రకారం డిస్కాం ల తో పవర్ పర్ఫెస్ అగ్రిమెంట్ ఉన్న అన్ని RE ప్రాజెక్ట్ లను తప్పనిసరిగా నడిచే స్టేషన్లు గా పరిగణించబడతాయి.</p> <p>SECI/NTPC/NHPC వంటి సెంట్రల్ ఏజెన్సీల ద్వారా పోటీ ధరల ప్రస్తుతంసార విద్యుత్ను కొనుగోలు చేయడం వల్ల గౌరవ కమిషన్ వారు నిర్దేశించిన పునరుత్పాదక విద్యుత్ కొనుగోలు బాధ్యతతో పాటు రాష్ట్ర విద్యుత్ అవసరాలను తీర్చడంలో సహాయపడటమే కాకుండా, సగటు విద్యుత్ కొనుగోలు వ్యయాన్ని తగ్గించేందుకువీలు కల్పిస్తుంది</p>
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<p>అదనపు విద్యుత్ ఉత్పత్తి :</p> <ol style="list-style-type: none"> 1 . యాదాద్రి 2x800 మొదటి దశ (01 .12 .2023 కు) రెండవ దశ 01 .02 .2024 కు పూర్తి అవుతుందని అంచనా వేశారు. 2 .తెలంగాణ ఎస్ టి పీపీ 2x680 (01 .01 .2023 కు) మొదటి దశ, 01 .07 .2023 రెండవ దశ పూర్తి అవుతాయి. 3 . ఎస్ టిపీసీ లో రావాల్సిన 396 మెగా వాట్లు అక్టోబర్22 నుండి వస్తుంది. 4 . ఎస్ టిపీసీ 735 మెగా వాట్లు 01 .04 .2023 కు పూర్తి అవుతుంది. 5 .మరో 1000 మెగా వాట్లు 01 .04 .2023 కే పూర్తి అవుతాయి. 6.ఈ విధంగా జరిగిన ఉత్పత్తి ని తగ్గించడం వల్ల వినియోగదారులపై భారాలు పడడమేగాక విద్యుత్ ఉత్పత్తికి పెట్టిన పెట్టుబడి వృధా అవుతుంది. 7. రెన్యూవబుల్ విద్యుత్ కి ప్రభుత్వ ప్రచారం చేస్తున్నదే తప్ప ఇప్పటికీ అందుబాటులోకి తగినంత విద్యుత్ రాలేదు. 	
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<p>4</p>	<p>సిఎండి ప్రకటన : రాష్ట్ర విద్యుత్ సిఎండి ఈ మధ్య ప్రకటిస్తూ " విద్యుత్ సంస్థలు నష్టాల్లో ఉన్నాయి. అవి తమ అంతరంగిక సామర్థ్యాన్ని పెంచుకోవాలి " అంటూ ప్రకటించారు. గత నుండి అనేక బహిరంగ విచారణలలో డిస్కాంలు అంతరంగిక సామర్థ్యాన్ని పెంచుకోవాలంటూ వినియోగదారులు ఎన్ని సార్లు చెప్పినా అందుకు తగిన విధంగా స్పందించడం లేదు.</p> <p>ట్రాన్స్మిషన్ లైన్లు - సబ్ స్టేషన్ లు - కండక్టర్ - కనెక్షన్లు సరిగా లేక అదనపు విద్యుత్ వినియోగం అవుతున్నది. అవసరానికి మించి నష్టాలు పెరుగుతున్నాయి. డిస్కాంలు చెప్పిన నష్టాలకు మించి నష్టాలు జరిగినప్పటికీ ఆ నష్టాలను వ్యవసాయ విద్యుత్ వినియోగం పైకి తోసివేసి తప్పుకుంటున్నాయి.</p>	<p>NPDCLలో అధిక నష్టాలు కలిగిన 11kv ఫీడర్లను తరుచుగా తనిఖీలు నిర్వహించబడుతున్నాయి, విద్యుత్ చౌర్యము కేసుల బుకింగ్, పాత మెకానికల్ మీటర్ల మార్పిడి, ఓవర్ లోడ్ 11KV ఫీడర్లను వేరు చేయడం మొదలైనవి మరియు అనధికార వినియోగదారులకు సర్వీసును క్రమబద్ధీకరించుకోమని తెలియచేస్తున్నాం అంతేకాకుండా డిస్కాం నష్టాలను తగ్గించుకోవడానికి అన్ని రకాల చర్యలు చేపట్టినాము గత నాలుగు సంవత్సరాల డిస్కాం నష్టాలను ఈ క్రింది టేబుల్ లో పేర్కొనడం జరిగినది.</p> <table border="1" data-bbox="997 617 1612 1006"> <thead> <tr> <th>SI No</th> <th>Financial Year</th> <th>% Loss (Incl.EHT)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2018-19</td> <td>9.9</td> </tr> <tr> <td>2</td> <td>2019-20</td> <td>9.04</td> </tr> <tr> <td>3</td> <td>2020-21</td> <td>9.02</td> </tr> <tr> <td>4</td> <td>2021-22</td> <td>8.76</td> </tr> </tbody> </table> <p>రియాక్టివ్ పవర్ తగ్గించుటకు మరియు AGL పంపుసెట్ల సమర్థవంతమైన వినియోగం కోసం కెపాసిటర్లు అందుబాటులో లేని చోట Agl.pump ల వద్ద 2/3KVAR కెపాసిటర్ల ఫిక్సింగ్ కోసం కూడా ప్రత్యేక డ్రైవ్ నిర్వహించబడుతోంది.</p> <p>1) కెపాసిటర్ సర్ విధింపు : గౌరవనీయమైన TSERC జారీ చేసిన టారిఫ్ ఉత్తర్వుల ప్రకారం KVAH బిల్లింగ్ పరిధిలోకి రాని LT వినియోగదారులు</p>	SI No	Financial Year	% Loss (Incl.EHT)	1	2018-19	9.9	2	2019-20	9.04	3	2020-21	9.02	4	2021-22	8.76
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		<p>(డొమెస్టిక్, LT-IV, LT-VI A, LT-VII B మినహా) తక్కువ పవర్ ఫ్యాక్టర్ను నివారించడానికి స యిన సామర్థ్యంగల కెపాసిటర్లను ఇన్స్టాల్ చేయాలి. ఫీల్డ్ ఆఫీసర్లు 1,33,577 సర్వీసులను తనిఖీ చేశారు మరియు కెపాసిటర్లను ఇన్ స్టాల్ చేయమని నోటీసులు జారీ చేశారు.</p> <p>2) కామన్ సర్వీస్ లు : గౌరవనీయమైన TSERC జారీ చేసిన 2022-23 సంవత్సరానికి సంబంధించిన టారిఫ్ ఆర్డర్లలోని క్లాజ్ 1.37 (iv) ప్రకారం, 56773 కామన్ సర్వీస్ లుగా గుర్తించబడ్డాయి మరియు ఆదాయ నష్టాన్ని నివారించేందుకు టారిఫ్ ఆర్డర్ లో ఇచ్చిన క్లాజ్ ప్రకారంగా బిల్లు చేయబడింది.</p> <p>3) తాత్కాలిక సర్వీస్ ల గుర్తింపు : గౌరవనీయమైన TSERC జారీ చేసిన టారిఫ్ ఉత్తర్వుల ప్రకారం, 10 మీటర్ల కంటే ఎక్కువ ఎత్తు ఉన్న నిర్మాణాలు/బహుళ అంతస్తుల భవనాలకు తాత్కాలిక సరఫరా కేటగిరీ (LT క్యాట్-VIII) కింద చేయాలి. 10 మీటర్ల కంటే ఎక్కువ ఎత్తు ఉన్న 3038 సర్వీసులను గుర్తించి, డిస్కంకు ఆదాయ నష్టాన్ని నివారించేందుకు టారిఫ్ ఆర్డర్ నిబంధనల ప్రకారం బిల్లింగ్ చేయబడుతున్నది.</p> <p>4) బహుళ సర్వీస్ ల గుర్తింపు: 1 కంటే ఎక్కువ సర్వీస్ లు ఒకే ఆవరణలో ఒకే ప్రయోజనం కోసం నడుస్తుంటే, 2వ సర్వీస్ ను బహుళ సర్వీస్ గా</p>
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		<p>గుర్తించబడుతుంది. TSNPDCLలో 3819 బహుళ సర్వీస్ లను గుర్తించబడ్డాయి మరియు డిస్కంకు ఆదాయ నష్టాన్ని నివారించడానికి టారిఫ్ ఆర్డర్ల నిబంధనల ప్రకారం బిల్లింగ్ చేయబడుతున్నది.</p> <p>5) 100% KVAH బిల్లింగ్: గౌరవనీయమైన TSERC జారీ చేసిన టారిఫ్ ఆర్డర్ల ప్రకారం TSNPDCL లో 100% KVAH బిల్లింగ్ జరుగుచున్నది. క్యాట్-II సర్వీస్ లో మీటర్ ద్వారా అమ్మకాలు మెరుగు పరుచుటకోసము (10 KW మరియు అంతకంటే ఎక్కువ లోడ్ కలిగి ఉన్న), క్యాట్-III సర్వీస్ లో (13 H.P. మరియు అంతకంటే ఎక్కువ లోడ్ కలిగి ఉన్న) మీటర్ ద్వారా అమ్మకాలు మెరుగు పరుచుటకోసము KVAH యూనిట్లతో బిల్లింగ్ చేయడం జరుగుతున్నది.</p>
5	<p>ప్రీ పేడ్ మీటర్లు : కేంద్ర ప్రభుత్వం ఒత్తిడితో ప్రీ పేడ్ మీటర్లను (ముందు డబ్బులు చెల్లించే విధానం) పెట్టాలని ప్రయత్నాలు జరుగుతున్నాయి. ఇప్పుడున్న పోస్ట్ పేడ్ మీటర్ల వల్ల జరిగిన నష్టాలు ఏమిటి ? ప్రైవేట్ వినియోగదారులు సక్రమంగా బిల్లును చెల్లిస్తున్నారు. ప్రభుత్వ సంస్థలు, ధృ పరిశ్రమాధిపతులు కోట్లలో బిల్లులు చెల్లించకపోవడం జరుగుతున్నది. ఇందుకు ప్రభుత్వం బాధ్యత వహించి వెంట వెంట చెల్లింపులు చేసే విధంగా బడ్జెట్ లో</p>	<p>కేంద్రప్రభుత్వ నోటిఫికేషన్ తేదీ 17.08.2021 ప్రకారం వ్యవసాయేతర వినియోగదారులకు అంచెలవారిగా 2025 సంవత్సరం వరకు ప్రీ మీటర్లు బిగించవలెనని ఆదేశాలు ఇచ్చినారు. కాని NPDCL లో సుమారు 50 లక్షల వినియోగదారులకు ప్రీ మీటర్లు బిగించుటకు Rs 457.60 కోట్లకు RDSS లో ప్రతిపాదనలు తయారుచేసి DRC మరియు తెలంగాణ క్యాబినెట్ అనుమతి కొరకు సమర్పించబడినవి కానీ అనుమతి రావలసియున్నది. ఇప్పటివరకు 15038 ప్రభుత్వ సంస్థలకు ప్రీ మీటర్లు బిగించబడినవి.</p>

	<p>కేటాయింపులు పొందు పర్చాలి.</p> <p>ప్రతి మీటరు కు డిస్కాంలు రూ. 300 లు చెల్లించడం ద్వారా ప్రీ పేడ్ మీటర్లు వస్తాయి .ఇప్పటికే రాష్ట్రం లో 1.65 కోట్ల కనెక్షన్లు ఉన్నట్లు అంచనా . ఇందులో 27 లక్షల కనెక్షన్లు వ్యవసాయ రంగాని తొలిగించినప్పటికీ డిస్కాంల పై భారం పడుతుంది. ఆ భారాన్ని మరో రూపంలో వినియోగదారులపై వేస్తారు. అందువల్ల ప్రాస్తుతం ఉన్న పోస్ట్ పేడ్ మీటర్లనే వినియోగించా .</p>	
<p>6.</p>	<p>కేంద్ర ప్రభుత్వ జోక్యం: రెగ్యులేటరీ కమీషన్లకు నియమించే వారిని విద్యుత్ శాఖ నుండి రిటైర్డ్ అయిన వారిని నియమించాలని ఈ మధ్య కేంద్ర ప్రభుత్వం ప్రకటన చేసింది. అంతేగాక ప్రీ పేడ్ మీటర్లను పెట్టాలని కేంద్రం రాష్ట్రాల పై ఒత్తిడి తెస్తున్నది. రాష్ట్రాల అనుమతి లేకుండానే పార్లమెంట్ లో కేంద్ర ప్రభుత్వం 2003 విద్యుత్ సవరణ బిల్లు ను ప్రవేశ పెట్టింది. ప్రస్తుతం అది సెలెక్ట్ కమిటీ కి వెళ్ళింది. రైతు నాయకులతో సంప్రదించాకనే బిల్లు ను ప్రవేశ పెడతానని ప్రధాని ప్రకటించినప్పటికీ అందుకు భిన్నంగా పార్లమెంట్ లో బిల్లు ను ప్రవేశ పెట్టడం జరిగింది.</p> <p>రాష్ట్ర ప్రభుత్వాలు ఎలాంటి సబ్సిడీలు విద్యుత్ వినియోగదారులకు</p>	<p>కేంద్ర ప్రభుత్వం 2003 విద్యుత్ సవరణ బిల్లు కు సంబంధించి సలహాలు/సూచనలను బిల్లు కు వ్యతిరేకంగా డిస్కాములు రాష్ట్ర ప్రభుత్వం ద్వారా కేంద్ర ప్రభుత్వానికి పంపడం జరిగినది. కేంద్ర ప్రభుత్వం జోక్యమునకు సంబంధించిన విషయాలు లైసెన్స్ పరిధిలో లేని అంశాలు.</p>

ఇవ్వకూడదని కేంద్ర ప్రభుత్వం చెప్పున్నది. అంతేగాక "కాస్ట్ టూ ప్రొడక్షన్" ప్రకారం ప్రతి వినియోగదారుడు చెల్లించాలని, క్రాస్ సబ్సిడీని తొలగించాలని ఆదేశిస్తున్నది. ప్రస్తుతం రాష్ట్ర లో అదనపు విద్యుత్ ఉన్నప్పటి ధర్మల్ విద్యుత్ ను తగ్గించాలని కోరడంతో తెలంగాణ రాష్ట్రము లో వినియోగదారులు విపరీతంగా నష్టపోతారు.

రాజ్యాంగం రీత్యా విద్యుత్ రాష్ట్ర జాబితా లో ఉంది. కానీ, కేంద్రం కార్పొరేట్ సంస్థలకు లబ్ధి కలిగించడానికి పై విధానాలతోపాటు "ప్రీ పేడ్ మీటర్ల విధానాన్ని" తీసుకొస్తున్నది. దీనివలన లక్షల మంది వినియోగదారులు విద్యుత్ వినియోగం నుండి దూరం అవుతారు.

రాష్ట్రాల విద్యుత్ రెగ్యులేటరీ కమిషన్ల నియామకం కూడా కేంద్రం కనుసన్నల్లో జరగాలని ఆదేశించడం జరుగుతున్నది. అందుకు తగిన ప్రకటనలు చేశారు. కేంద్రం తన జోక్యాన్ని ఉపసంహరించుకునే విధంగా రెగ్యులేటరీ కమిషన్ రికమండేషన్లు చేయాలి.

పై అంశాలను గమనంలోకి తీసుకోడంతోపాటు బహిరంగ విచారణలో పాల్గొని మరిన్ని అంశాలను మీ దృష్టికి తేవడానికి అవకాశాన్ని ఇవ్వాలని కోరుతున్నాను.

2023-24 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదనలు & క్రాస్ సబ్సిడీ సర్పార్టీ ప్రతిపాదనలు మరియు ట్రా-అప్ ప్రతిపాదనలు పై రాచమల్ల పున్నమా చార్యులు, అఖిల భారతీయ విశ్వకర్మ పరిషత్ వ్యవస్థాపకులు, జాతీయ అధ్యక్షులు, హైదరాబాద్ గారి సూచనలు/సలహాలకు సమాదానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాదానాలు
1.	<p>2023-24 సంవత్సరపు విద్యుత్ సంస్కరణల విషయమై గౌరవ తెలంగాణ రాష్ట్ర ఎలక్ట్రిసిటీ రెగ్యులేటరీ కమిషన్(TSERC) వారు నిర్వహించబోతున్న బహిరంగ విచారణల సందర్భమును పురస్కరించుకొని, రాష్ట్రంలోని విశ్వకర్మీయుల వృత్తుల పరిరక్షణకోసం ఆచార్య రాచమల్ల పున్నమా చార్యులు గారు ప్రారంభించిన "రాష్ట్ర వ్యాప్తమైన ఉలి-బాడిష ఉద్యమం" ద్వారా అభ్యర్థిస్తూ " అఖిల భారతీయ విశ్వకర్మ పరిషత్ " ప్రతిపాదిస్తున్న అభ్యర్థిత ప్రతిపాదనలన్నీ వెంటనే అమలు చేయాలని విజ్ఞప్తి చేస్తూ గౌరవ తెలంగాణ రాష్ట్ర ప్రభుత్వం వారికి, గౌరవ తెలంగాణ రాష్ట్ర ఎలక్ట్రిసిటీ రెగ్యులేటరీ కమిషన్ వారికి సమర్పించుకుంటున్న " విజ్ఞాపన పత్రము " తేదీ, 31 - 12 - 2022 శనివారము హైదరాబాద్,</p> <p>అయ్యో,</p> <p>విషయము- రాష్ట్రములోని వ్యవసాయ రంగానికే వెన్నముకలైన గ్రామ గ్రామాన పట్టణ ప్రాంతములలో వ్యాపించియున్న దేశ నిర్మాతలు విశ్వ హిందూ భారతీయ</p>	<p>ప్రస్తుతం కార్పొరేటరీ, బ్లాక్ స్మిత్, కంచరి, స్మిత్, మరియు దేవశిల్పి మొదలైన కుటీర పరిశ్రమలకు 10HP వరకు విద్యుత్ వాడుకొనుటకు LT-IVA కుటీర పరిశ్రమల విభాగం క్రింద బిల్లు చేయడం జరుగుతున్నది మరియు ఈ LT-IVA విభాగంలో</p>

<p>నాగరికత సృష్టి కర్తలు సృష్టిలో ప్రతి సృష్టి చేసి మరో నాగరిక ప్రపంచాన్ని సృష్టించిన ప్రాచీన శాస్త్ర సాంకేతిక నిపుణులైన విశ్వ కర్మీయుల కమ్మరం - వడ్రంగం పారిశ్రామిక వృత్తులవారు స్థాపించుకున్న 20 HP లోపు విద్యుత్ వాడకం గల ఇనుము - కలప ఆధారితమైన కుటీర పరిశ్రమలన్నింటికి రైతులతో సమానంగా ఇరవై నాలుగు (24) గంటలు ఉచితంగా విద్యుత్ అందించాలి.</p> <p>రాష్ట్ర వ్యాప్తమైన వ్యవసాయేతర పట్టణ ప్రాంతములలోని కుటీర పరిశ్రమలన్నింటికి కుల -మత-వర్గాలకు అతీతముగా రెండు (2/-) రూపాయలకే యూనిట్ విద్యుత్ సరఫరా చేసి, విదేశీ బహుళజాతి కంపెనీల ఉక్కు ఫాదల క్రింద నలిగి పోతున్న మా కుటీర పరిశ్రమలను ఆర్థికముగా ఆదుకొని రక్షించాలి.</p> <p>తరతరాలుగా జీవనాధారిత వృత్తులుగా కొనసాగుతూ వస్తున్న విశ్వ కర్మీయుల కంచరం-దేవశిల్పి - స్వర్ణకార కుటీర పరిశ్రమలన్నింటికి కనీసం రెండు (200) వందల యూనిట్ల వరకు ఉచిత విద్యుత్ అందించాలి!, రెండు (200) వందల ఆపై యూనిట్లన్నింటికి క్యాటగిరి IV ధరలు వర్తింప చేయాలి! స్థిర చార్జీలు ఇరవై (20/-) రూపాయల నుండి తగ్గించరాదు పెంచరాదు,</p>	<p>ఎనర్జీ చార్జీలు యూనిట్ ఒక్కంటికి రూ 4-00, మరియు స్థిర చార్జీలు 1KW 20 రూ నెలకి వసూలు చేయటం జరుగుతున్నది. 2016-17 ఆర్థిక సంవత్సరం నుండి ఈ కుటీర పరిశ్రమలకు చార్జీలను పెంచలేదు మరియు ఈ LT- IVA క్యాటగిరి సబ్సిడైజెడ్ క్యాటగిరి. ఆర్థిక సంవత్సరం 2022-23 టారిఫ్ ఆర్డర్ ప్రకారం ఒక యూనిట్ సప్లయి చేయడానికి అయ్యే సగటు వ్యయం రూ 7.51 కానీ LT IVA కుటీర పరిశ్రమలకి సబ్సిడైజెడ్ క్యాటగిరిలో యూనిట్ ఒక్కంటికి ఎనర్జీ చార్జీలను రూ 4/- మాత్రమే బిల్లు చేయడం జరుగుచున్నది.</p> <p>20 HP లోపు ఇనుము - కలప ఆధారితమైన కుటీర పరిశ్రమలకి రైతులతో సమానంగా ఉచిత విద్యుత్ అందించుట, రాష్ట్ర వ్యాప్తమైన వ్యవసాయేతర పట్టణ ప్రాంతం లోని కుటీర పరిశ్రమలన్నింటికి కుల-మత వర్గాలుగా అతీతముగా రెండు (2 /-) రూ. కే యూనిట్ విద్యుత్ సరఫరా చేయుట మరియు విశ్వ కర్మీయుల కంచరం- దేవశిల్పి -స్వర్ణకార కుటీర పరిశ్రమలన్నింటికి 200 యూనిట్ల వరకు ఉచిత విద్యుత్ అందించుట అనే విషయం ప్రభుత్వ పరిధిలోని అంశం.</p>
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	<p>2003 లో అఖిల భారతీయ విశ్వకర్మ పరిషత్ వారు చేసిన అభ్యర్థనల మేరకు ప్రస్తుతానికి అమలులోవున్న 10 HP స్థాయి నుండి 50 HP స్థాయి వరకు పెంచాలి! మరియు రాష్ట్ర వ్యాప్తమైన ఉలి-బాడిష ఉద్యమం ద్వారా అఖిల భారతీయ విశ్వకర్మ పరిషత్ అభ్యర్థిస్తూ ప్రతిపాదిస్తున్న అభ్యర్థిత ప్రతిపాదనలన్నీ వెంటనే గౌరవ తెలంగాణ రాష్ట్ర ప్రభుత్వం వారు, గౌరవ TSERC వారు ఆమోదించి అమలు చేసి ఆదుకోనుట గురించి 2023-24 సంవత్సరముకు గాను విద్యుత్ వినియోగదారులందరికీ ఎలాంటి వినియోగ చార్జీలు పెంచటం లేదని, గౌరవ తెలంగాణ రాష్ట్ర నియంత్రణ మండలి వారు ఈ మధ్య కాలంలో ప్రకటన చేయటం ఎంతో హర్షణీయం, ఇందుకు గౌరవ TRANSCO వారు, GENCO వారు, విద్యుత్ పంపిణీ సంస్థలైన సెంట్రల్ పవర్ డిస్ట్రిబ్యూషన్ వారు, నార్తర్న్ పవర్ డిస్ట్రిబ్యూషన్ వారు కూడా అంగీకరించి అమలు చేయటం, ఎంతో గర్వించ తగిన విషయం, ఇందుకు మా అఖిల భారతీయ విశ్వకర్మ పరిషత్ వారు "రాష్ట్ర వ్యాప్తమైన ఉలి-బాడిష ఉద్యమం" ద్వారా కృతజ్ఞతలు తెలియ చేసుకుంటున్నది, స్వీకరించ ప్రార్థన.</p>	<p>డిస్కం లు ఇప్పటి నష్టాలలో కూరుకుపోయి ఉన్నవి కావున ఇంకా చార్జీలను తగ్గించలేము మరియు కుటీర పరిశ్రమల LT -IVA లోడ్ స్థాయి 10 HP నుండి 50 HP పెంచలేము మరియు కేంద్ర ప్రభుత్వ (MOP) ఆదేశాల ప్రకారం ఒక క్యాటగిరీ లో యూనిట్ సప్లై చేయడానికి అయ్యే వ్యయానికి తగ్గట్లు గా ధరలను నిర్ణయించాలి.</p>
<p>2.</p>	<p>ప్రత్యేక తెలంగాణ రాష్ట్రం ఆవిర్భావం తర్వాత జిల్లా లు మండలాలు పెంచుకున్నామే కానీ విద్యుత్ సరఫరా సౌలభ్యం కోసం పంపిణీ సంస్థలను పెంచుకోలేక పోయాం? ఆదికగా అలోచించి పంపిణీ సంస్థలను పెంచాలని అఖిల భారతీయ విశ్వకర్మ పరిషత్ విజ్ఞప్తి చేస్తున్నది</p> <p>ప్రజల అవసరాలు అభిప్రాయాలు అభ్యర్థనల మేరకు, "ప్రజల వద్దకు పాలన"</p>	<p>ప్రభుత్వ ఆదేశాల ప్రకారం రైతులకు 24 గంటల ఉచిత విద్యుత్ సరఫరా చేయటం జరుగుతున్నది. ఏ స్థాయి రైతులకు ఉచితంగా అందించాలి అనే విషయం, రైతు బంధు పథకం మరియు విద్యుత్ పంపిణీ సంస్థలను పెంచుకోవటం అనేది లైసెన్స్ పరిధిలో లేని అంశం.</p>

అందించాలనే ఏకైక లక్ష్యం 2004 లో ప్రారంభించిన "బహిరంగ విచారణ" ల కార్యం, తెలంగాణ రాష్ట్రం ఆవిర్భావం తర్వాత తగ్గిపోయిన మాట వాస్తవం, అందువల్ల రాష్ట్రంలోని రైతులకు ఇరవై నాలుగు (24) గంటల ఉచిత విద్యుత్ అందిస్తున్న విధానములలో రైతులకు అనేక రకములైన అభిప్రాయములున్నవి, వారి అభిప్రాయములను తెలుసుకోవటానికి వీలు కావటం లేదు,

"ఉచిత విద్యుత్" ఏ స్థాయి రైతులకు అందించబడాలనేది, "పేద రైతుల మరియు సమగ్రమైన ప్రజల ప్రశ్న? పది గంటల భూమి గల రైతు మొదలు, పది వందల ఎకరముల భూమి గల రైతు వరకు "ఉచిత విద్యుత్" కు అర్హులేనా? ఇరవై నాలుగు (24) గంటల విద్యుత్ సరఫరా అనేది చాలా సంతోషించ తగ్గ విషయం కాదనలేము, కానీ! అందరికీ ఉచిత విద్యుత్ అందించబడాలి అంటే? భూస్వాములకే ఎక్కువ లాభం చేకూరుతున్నది కదా? ఈ విధానం ద్వారా పేద రైతులకు, పేద ప్రజల పై కూడ అధిక భారం పడుతున్నది కదా? ఇట్టి భారం నుండి "పేద రైతులను-పేద ప్రజలను" రక్షించటం ఎలా? అన్నది ప్రజల ప్రశ్న.

అదే క్రమంలో "రైతు బంధు" పథకంలో కూడ, ఉచిత విద్యుత్ సరఫరా కన్నా ఎక్కువ భారం, పేద రైతుల పై - పేద ప్రజలు మోయవలసి వస్తున్నది వాస్తవముగా ఇది పేద ప్రజల ప్రభుత్వమేనా? భూస్వాములు, పెట్టుబడిదార్లు, గుత్తేదార్లు కలిసి వారి వారి ప్రయోజనాల కోసం, మరిన్ని ఆస్తులు పెంచుకోవటానికి పరిపాలిస్తున్న భూస్వామిక వర్గాల ప్రభుత్వమా? అనే విషయాన్ని పేద ప్రజలు - పేద రైతులు తెలుసుకొని వారు వారు జాగ్రత్త వహించాలి అంటే? విద్యుత్ సంస్కరణల కోసం, ప్రజా "బహిరంగ

ప్రత్యేక తెలంగాణ రాష్ట్ర ఆవిర్భావము తరువాత విద్యుత్ సరఫరా సౌలభ్యం కోసము వివిధ హోదాలలో అనగా JLM స్థాయి నుండి సూపరింటెండింగ్ ఇంజనీర్ స్థాయి వరకు పెంచుకోవడము జరిగినది. అంతేకాకుండా వినియోగదారులకు మెరుగైన సేవలు చేయడానికి కొత్త , కొత్త సబ్ డివిజన్ , కొత్త డివిజన్ ఆఫీసులను ఏర్పాటు చేసుకోవడం జరిగినది.

గౌరవ తెలంగాణ రాష్ట్ర విద్యుత్ నియంత్రణ మండలి వారు ప్రతీ సంవత్సరం సమగ్ర ఆదాయ ఆవశ్యకత & ధరల ప్రతిపాదనల పై బహిరంగ విచారణను TSNPDCL పరిధిలో ఎదో ఒక జిల్లా లో నిర్వహించడం జరుగుతున్నది. ఇవే కాకుండా గత సంవత్సరం నుండి గౌరవ కమీషన్ వారు ప్రతీ నెల లేదా రెండు నెలలకి ఒకసారి ఎదో ఒక జిల్లా లో లేదా అంత కంటే ఎక్కువ జిల్లా లో వినియోగదారుల సమస్యలను పరిష్కరించడానికి వినియోగదారులతో ముఖాముఖి సమావేశాలను (బహిరంగ విచారణలు) నిర్వహించడం జరుగుతున్నది.

	<p>విచారణలు" తప్పనిసరి అవసరం, అందుకు తెలంగాణ రాష్ట్రం ఆవిర్భావం తర్వాత, ముప్పై మూడు (33) జిల్లా లు ఏడు వందల వరకు మండలాలను పెంచుకున్నాం కానీ విద్యుత్ పంపిణీ సంస్థలను పెంచుకోలేదు ఆకారణముగా "ప్రజల వద్దకు ప్రజా పాలనను" తీసుకువెళ్లలేక పోతున్నాము కనుక తప్పని సరిగా విద్యుత్ పంపిణీ సంస్థలను కూడ పెంచాలని, ప్రతీ సంవత్సరము, ప్రతీ జిల్లా లలో "బహిరంగ విచారణలు జరపాలని గౌరవ తెలంగాణ రాష్ట్ర విద్యుత్ నియంత్రణ మండలి వారిని అఖిల భారతీయ విశ్వకర్మ పరిషత్ విజ్ఞప్తి చేస్తున్నది</p>	
<p>3.</p>	<p>రైతులకు మీటర్లు పెడితే తప్పా? ఏ రైతులకు మీటర్లు పెట్టా లి? ఏ రైతులకు మీటర్లు పెట్టొ ధ్దు? అనేది కదా? ఇక్కడ ప్రశ్న. పేద రైతులకు మీటర్లు పెట్టొ ధ్దు వారు (10) గుంటల భూమి మొదలు ఐదు (5) ఎకరములు గల భూములున్న వారంతా పేద రైతులేనని 1974 లో ఆనాటి గౌరవ ప్రధాన మంత్రి వీరోచిత నారీమణి దైర్యశాలీ అయిన మాత శ్రీమతి ఇందిరా గాంధీ గారు భూ నియంత్రణ చట్టము లోనే స్పష్టముగా పేర్కొన్నారు, సీలింగ్ చట్టము తెచ్చారు అమలు పరిచారు సమ సమాజ స్థాపనకు ఆనాడే పునాదులు వేశారు, కానీ ఆ తర్వాత మన రాష్ట్ర పరిపాలనా బాధ్యతలు చేపట్టిన గౌరవ వై. ఎస్. రాజశేఖర్ గారు సమ సమాజ స్థాపన మూలాలను ఎత్తివేసి, సీలింగ్ చట్టాలను రాష్ట్రములో</p>	<p>ఐదు (5) ఎకరముల కన్నా ఎక్కువ భూములున్న ప్రతి భూస్వామిక రైతుల భూములకు మీటర్లు పెట్టవలసిందే అనేది ప్రభుత్వ పరిధి లోని అంశం.</p>

	<p>ఎత్తివేసి భూస్వామిక రైతుల రాజ్యాన్ని స్థాపించారు పట్టణ భూపరిమితి చట్టమును కూడ రద్దు చేసి "రియల్ ఎస్టేట్స్" వ్యాపారులకు అవకాశములు కల్పించారు.</p> <p>ఆనాడు బలీయమైన పునాదులు పడ్డ "రియల్ ఎస్టేట్" వ్యాపారమును నేటి గౌరవ మన ముఖ్య మంత్రి వర్యులు గారు, మానవీయ కల్వకుంట్ల చంద్రశేఖర్ రావు గారు మరింత బలోపేతమైన వ్యవస్థగా రూపుదిద్దారు ఇప్పుడు రాష్ట్రాన్ని పాలిస్తున్నది భూస్వామిక వర్గ రైతుల ప్రభుత్వమే కాని ! ద రైతుల - పేద ప్రజల ప్రభుత్వము కాదు, కనుక, ఐదు (5) ఎకరముల కన్నా ఎక్కువ భూములున్న ప్రతి భూస్వామిక రైతుల భూములకు మీటర్లు పెట్టవలసిందే? వినియోగ విద్యుత్ కు కనీస కరంటు చార్జీలు వసూలు చేయవలసిందే? అట్టి నిధులను పేద రైతులకు - పేద ప్రజలకు పంచవలసిందేనని, అఖిల భారతీయ విశ్వకర్మ పరిషత్ గౌరవ తెలంగాణ రాష్ట్ర ఎలక్ట్రిసిటీ రెగ్యులేటరీ కమీషన్ వారికి విజ్ఞప్తి చేస్తున్నది</p>	<p>భూపరిమితి చట్టాలు సీలింగ్ చట్టాలు అనే విషయాలు లైసెన్స్ పరిధిలో లేని అంశాలు.</p>
<p>4.</p>	<p>మా విశ్వకర్మీయుల కుటీర పరిశ్రమలలోని "వెల్డింగ్ పరికరానికి" ఇకెంత కాలం కొనసాగిస్తారు? రాద్ధాంతాన్ని "బ్లా క్స్మిత్" అంటేనే "వెల్డింగ్ పరికరం" ఉంటుందని గడిచిన 18 సంవత్సరాలుగా వివరణ ఇచ్చు వస్తున్నాను ఇట్టి విషయమై మా అఖిల భారతీయ విశ్వకర్మ పరిషత్ అన్ని "బహిరంగ విచారణ" ల లోను అభ్యర్థిస్తూ వస్తున్నది. కావున "బ్లా క్స్మిత్స్ అనే కుటీర పరిశ్రమల" లో వెల్డింగ్ పరికరం, లే మిషన్, డ్రీలింగ్ మిషన్, కటింగ్ మిషన్ లాంటి చిన్న చిన్న ఆధునిక పరికరాలన్నీ వుంటాయనే వాస్తవాన్ని గౌరవ తెలంగాణ రాష్ట్ర ఎలక్ట్రిసిటీ రెగ్యులేటరీ కమీషన్ వారు, గౌరవ ట్రాన్స్మో, జెనుకో వారు, విద్యుత్ పంపిణీ సంస్థలైన గౌరవ తెలంగాణ రాష్ట్ర</p>	<p>టారిఫ్ ఆర్డర్ ప్రకారం "బ్లా క్స్మిత్" వారిని LT - IV A కుటీర పరిశ్రమలు క్రిందనే పరిగణించడం జరుగుతున్నది మరియు ప్రతి సంవత్సరం కమీషన్ వారు జారీ చేసే టారిఫ్ ఆర్డర్ లలో వచ్చే మార్పులను క్రింది స్థాయి అధికారుల వరకు పంపించడం జరుగుతుంది మరియు వారు వాటిని అమలు చేయడం జరుగుతున్నది.</p>

	<p>సెంట్రల్ పవర్ డిస్ట్రిబ్యూషన్ వారు మరియు గౌరవ తెలంగాణ రాష్ట్ర నార్తర్న్ పవర్ డిస్ట్రిబ్యూషన్ వారు, దయతోవెంటనే "బ్లా క్స్మిత్ కుటీర పరిశ్రమల" లో తప్పని సరిగ్గా వెల్డింగ్ పరికరం, లే మిషన్, డ్రిలింగ్ మిషన్, కటింగ్ మిషన్ లాంటి చిన్న చిన్న పరికరాలు వున్నా కానీ! " విద్యుత్ వాడకాన్ని" మాత్రమే లెక్కగట్టి, అమలు చేయుటకు వీలుగా వెంటనే క్రింది స్థాయి అధికారులకు స్పష్టమైన ఉతర్వులు జారీ చేయాలని "రాష్ట్ర వ్యాప్తమైన ఉలి-బాడిష ఉద్యమం" రా అఖిల భారతీయ విశ్వకర్మ పరిషత్ విజ్ఞప్తి చేస్తున్నది</p>	
5.	<p>మిగతా అభ్యర్థనలు సమగ్రమైన విషయాలు గౌరవ తెలంగాణ రాష్ట్ర ప్రభుత్వము వారికి మరియు గౌరవ కేంద్ర ప్రభుత్వము వారికి, గౌరవ కేంద్ర ఎలక్ట్రిసిటీ రెగ్యులేటరీ కమీషన్ వారికి మరియు గౌరవ తమిళికి, ఒక వారము (7) దినములలో సమగ్రమైన విజ్ఞాపన పత్రమును సమర్పించు కోగలమని విన్నవించుకుంటున్నాను</p>	

2023-24 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదనలు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల మరియు ట్రూ-అప్ ప్రతిపాదనలు పై ఎ. రమేష్, జగిత్యాల, డి. రవి, జగిత్యాల, ఎ. ఆనంద రావు, కామారెడ్డి, చంద్రయ్య, నాగర్ కర్నూల్, ఎల్. మాణిక్ రెడ్డి, వికారాబాద్, ఎస్. స్వామి, నాగర్ కర్నూల్, పి. మురళీధర్, హనుమకొండ, ఎ. వీరభద్ర రావు, సికింద్రాబాద్, ఎల్. శంకర్, కామారెడ్డి, ఎమ్. రాజీగౌడ్, కామారెడ్డి, డి.సి సాయిలు, కామారెడ్డి, ఎమ్. రాజిరెడ్డి, రంగా రెడ్డి, కె. అంజన్న, కామారెడ్డి, డి. రాము, హైదరాబాద్, కె. జశ్వంత్ రెడ్డి సిద్దిపేట, పి. నరసింహ రెడ్డి, సంగారెడ్డి, పి. రామకృష్ణ రెడ్డి, సంగారెడ్డి, బి. సంజీవ రెడ్డి, వరంగల్, ఈ. గణపతి రెడ్డి, కామారెడ్డి, ఎం. శ్రీధర్, హైదరాబాద్, కృష్ణ రెడ్డి, ఖమ్మం, శ్రీ రెడ్డి సత్యనారాయణ రెడ్డి రంగా రెడ్డి, జె. సంపత్ రావు, సిరిసిల్లా, ఎ. ఎల్లా రెడ్డి జనగాం, జి. వినోద్ కుమార్, జె. శ్రీరంగ రావు, హైదరాబాద్

గారి సూచనలు/ సలహాలకు సమాదానాలు

క్రమసంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాదానాలు
1.	Category-III ప్రార్థనా స్థలాలకు సంబంధించిన 6.40 మరియు 7.00 రూ.ల ఉన్న 5.00 రూ.ల per unit గా చేసి తగ్గించడానికి A.R.R లో ప్రతిపాదించినందుకు SPDCL NPDCL మరియు CESS సిరిసిల్లా వారికి కృతజ్ఞతలు తెలియజేస్తూ గౌరవ కమిషన్ వారు అనుమతించాలని ప్రార్థిస్తూ న్నాము	ప్రార్థనా స్థలాలకు సంబంధించి తగ్గించిన ధరల యొక్క డిస్కంల ప్రతిపాదనలను సమర్థించినందుకు దన్యవాదములు.
2.	H.T-III క్యాటగిరిలో ఎయిర్ రైల్వే స్టేషన్ మరియు బస్ స్టేషన్ల ఉన్న నుండి ఎయిర్ పోర్టును విడదీసి Category క్రిందకు	

<p>తీసుకువచ్చి తగిన Tariff నిర్ణయించాలి. రైల్వే స్టేషన్లు, బస్ స్టేషన్ లను ఎయిర్ పోర్టులకు వేరేగా చూడాలి. ఎయిర్ పోర్టులో Parking, Air Cargo, మరియు ఇతర సేవలకు రైల్వే, బస్సు షల్లో ప్రయాణికులు చెల్లించే రేట్లకు చాల తేడాలు ఉన్నాయి. ఎయిర్ పోర్టులు పూర్తిగా వ్యాపార దృక్పథంతోనే నడుస్తున్న సంస్థ. రైల్వే, బస్ స్టేషన్ లు సామాన్య ప్రజల సేవకు పాత్రమవుతున్నాయి. గౌరవ కమిషన్ వారు ఇటీవల ఆదేశాలలో Aviation మరియు Non-Aviation ను విడదీయమని తెలిపారని ప్రస్తుత A.R.R 0.16 ఐటమ్ 0. 4 Tariff Order 2022-23 లో 0.244, ఐటమ్ 0. 4లో తెలిపారు. సమాధానంగా ఆదేశాలను పాటిస్తామని తెలిపారు. 2022 సెప్టెంబర్ వరకు కమిషన్ వారు సమయమిచ్చినా, ఇంతవరకు ఏమి చేసారో తెలపలేదు.</p> <p>ఏ క్యాటగిరికి సంబంధించిన సర్వీసులు ఎన్ని ఉన్నాయి? మొత్తం G.M.R. ఎయిర్ పోర్టు 5400. ఎకరాల విస్తీర్ణంలో End Use Aviation, Non-Domestic మరియు Commercial Star Hotels, Advertisements మనకు బాహ్యంగా కనిపిస్తున్నాయి ఇందులో End Use ఆధారంగా ఏ Category సర్వీసుల్లో ఎంత వినియోగం అవుతుందో తెలియజేయండి. H.T. లో అడ్వర్టైజ్మెంట్ క్యాటగిరికి టారిఫ్ నిర్ణయించబడలేదు. End Use ను దృష్టిలో పెట్టుకొని, కమిషన్ వారు</p>	<p>లైసెన్స్ పరిధిలో లేని అంశం.</p>
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<p>తెలిపిన ప్రకారంగా Tariff అమలు చేయడానికి ఆస్కారమే లేదు. Tariff లేని ఎలా అమలు చేస్తారో తెలియజేయగలరు. 30-09-2022 వరకు ఆదేశాలు పాటించకుంటే అత్యధిక Tariff గా తరువాత A.R.R. లో ప్రొజెక్షన్ చూపించమని కమిషన్ తెలిపారు. అత్యధిక టారిఫ్ ప్రొజెక్షన్ ఈ A.R.R. లో చూపించలేదు.</p> <p>గౌరవ కమిషన్ వారు వాస్తవ End Use ను పరిశీలింపజేసి L.T. -2 C Advertisement Hoardings 13 రూ.లుగా L.T. లో ఉన్న Tariff (ధరలు) ను దృష్టిలో యుంచుకొని ధరలు నిర్ణయించి, లాభాపేక్షతో పని చేస్తున్న G.M.R. ఎయిర్పోర్ట్ ద్వారా నష్టపోతున్న ఆదాయాన్ని పరిగణనలోకి తీసుకొని సరియైన ధరను రాబట్టా లని కోరుచున్నాము.</p>	
<p>3. ట్రాన్స్ ఫార్మర్ల రవాణా : గ్రామీణ వినియోగదారులు - SPDCL పరిధిలో 14 సర్కిల్లలో 15,761 D.T.R. లు స్వంత రవాణా చేసుకున్నారని, A.R.R. ' నెం. 85లో తెలియపరిచారు. అత్యధికంగా నల్గొండలో ఉన్నాయి. నెం. 81లో 9041 D.T.R. లు రైతులే రవాణా చేసుకున్నారని తెలిపారు. ఇందులో గమనించాల్సిన విషయం D.T.R. వినియోగదారులే (రైతులే) తీసుకు వచ్చారంటే ఎవరు దింపారు? ఎవరు బండిలో లోడ్ చేసారు? సంబంధించిన T-Note ఇతరత్రా పేపర్ వర్క్ ఎవరు చేసారు? (ఎంత ఖర్చు పెట్టా రనేది క్షేత్రస్థాయి పరిశీలనలో తేలుతుంది) ఎవరు అన్లోడ్ చేశారు? " చేయించడానికి</p>	<p>గ్రామీణ ప్రాంతాల్లో రాకపోకలు సాగించడానికి వీలులేని పరిస్థితులలో మరియు యాసంగి, వాన కాలము లో అధిక డీటీఆర్లు కాలిపోయినపుడు, అనివార్య పరిస్థితుల్లో కొన్నిసార్లు డీటీఆర్లను రైతులే రవాణా చేస్తున్నారు అయితే, అటువంటి సందర్భాలలో కూడా కాలిపోయిన డిటీఆర్ తీసివేయడానికి, రవాణా చేయడానికి మరియు పెట్టడానికి కేవలం డిపార్ట్మెంటల్ సిబ్బంది పర్యవేక్షణలో జరుగుతున్నాయి. చిన్న రేటింగ్ సామర్థ్యం కలిగిన కాలిపోయిన DTR లను డిపార్ట్మెంటు వెహికల్ ద్వారా చాల మటుకు ట్రాన్స్ పోర్ట్ చేస్తున్నాము.</p>

	<p>కానీ లేక రిఫ్లెక్సింగ్స్ కానీ రైతులకెంత ఖర్చు అయింది? D.T.R. Fit ఎవరు చేసారు? ఎంత ఖర్చు అయింది? ఇట్టి Process లో నైపుణ్యం లేని వారు ఈ పని చేసినందుకు ప్రమాదాలు ఎన్ని జరిగాయి? ఒకవేళ జరిగితే ఎవరు బాధ్యత వహిస్తారు?.</p>	
4	<p>ప్రతి Agricultural Service వద్ద 15 వోల్టుల బల్బు వెలిగించుకోవడానికి గతంలో గౌరవ కమిషన్ వారు అనుమతించారు. న్యూట్రల్ వైర్ లేకుండా బల్బు అవకాశం ఉండదు. కావున న్యూట్రల్ వైరు సౌకర్యం కావాలని గౌరవ కమిషన్ వారిని అర్థించగా వారు అనుమతించారు. డిస్కమ్ వారు దశల వారీగా న్యూట్రల్ వైర్ సౌకర్యం కల్పిస్తామని తెలియజేశారు. కానీ ఇప్పటి వరకు అట్టి సౌకర్యము రాష్ట్రంలో ఎక్కడా కల్పించడం లేదు. వెంటనే న్యూట్రల్ వైర్ సౌకర్యం ఏర్పడేటట్లు తగిన చర్యలు తీసుకోవాలని గౌరవ కమిషన్ గారిని కోరుచున్నాము.</p>	<p>ఇట్టి సూచనను పరిశీలించగలము.</p>
5	<p>విద్యుత్ ప్రమాదాల వల్ల దుర్మరణాలు చెందిన వారి సంఖ్య SPDCL, ARR లో నెం. 267, 268లో NPDCL నెం. 87, 97లో వివరించారు. (తక్షణ సహాయం కూడా చెల్లించామని తెలిపారు. NPDCL వారు దుర్మరణానికి కారణాలు కూడా వివరించారు. SPDCL వారు కారణాలు వివరించలేదు. ప్రమాద కారణాలను గుర్తిస్తే వాటిని అరికట్టే చర్యల గురించి ఆలోచించవచ్చు. తగిన చర్యలు తీసుకోవచ్చు. మరణాలకు ఎక్స్ గ్రేషియా బాధిత కుటుంబానికి పరిష్కారం కాదు. అది తాత్కాలిక ఉపశమనం మాత్రమే. దుర్మరణాలను తగ్గించడానికి తగిన చర్యలలో</p>	<p>i. జనవరి-2023 వరకు మానవులకు సంభవించిన మొత్తం ప్రమాదాల సంఖ్య 344 వాటిలో 296 ప్రమాదాలు వినియోగదారుల వైపు నుండి 85% వినియోగదారుల వైపు కారణంగా సంభవించాయి.</p> <p>ii. గౌరవనీయులైన CMD గారు విద్యుత్ భద్రతా చర్యలపై విస్తృత అవగాహనా కలిగించేందుకు ప్రింట్ మీడియా ద్వారా ఈ క్రింది సూచనలు చేసారు .</p> <p>a. విద్యుత్ వినియోగదారులు ISI ఉపకరణాలు వినియోగించి భద్రత సూచనలు పాటించడం ద్వారా విద్యుత్ ప్రమాదాలు నివారించవచ్చు.</p>

భాంగా వినియోగదారులు ఏమి చేయాలి? డిస్కమ్ బాధ్యత ఏమిటి? అనేది అవగాహన గ్రామస్థాయిలో సదస్సుల ద్వారా, Wall Writing ల ద్వారా Flexi ల ద్వారా గ్రామాల్లో మరియు డిస్కమ్ ఆఫీస్ లో గ్రామ, మండల, పంచాయితీ మరియు తహసీల్దార్ కార్యాలయాలలో ఏర్పాటు చేసే ప్రయత్నం చేయాలని డిస్కమ్ మరియు కమిషన్ వారిని కోరుతున్నాము. SPDCL CMD రఘుమారెడ్డి గారు సంక్రాంతి సందర్భంగా పతంగులు ఎగురవేసే వారు ప్రమాదాలకు లోనుకాకుండా ఉండడానికి తగిన సూచనలు వివరణాత్మకంగా ఇచ్చారు. అటువంటి చర్యలు గ్రామీణ ప్రాంతంలో కూడా చేపట్టాలి విద్యుత్ షాక్ వల్ల గాయపడిన వారికి కూడా తక్షణ సహాయం అందించాలి.

- b. రైతులు వ్యవసాయ పంపుసెట్లు వాడుతున్నప్పుడు మోటార్, పైపులు , ఫుట్ వాల్వులను ఏమరపాటుతో తాకరాదన్నారు. పంపుసెట్లను విధిగా ఎర్ట్ చేయించాలన్నారు. పంపు సెట్లవద్ద సాంకేతిక లోపం తలెత్తితే సొంత మరమ్మతులు చేపట్టవద్దన్నారు.
- c. దుస్తులు ఆరేసే దండెం విద్యుత్ తీగలు తాకకుండా చూసుకోవాలన్నారు.
- d. పంటల రక్షణ కోసం ఏర్పాటు చేసిన కంచెకు విద్యుత్ కనెక్షన్ ఇవ్వడం మరియు కాలువల వెంట అనధికారికంగా బిగించిన మోటార్లవలన మనుషులతో పాటు జంతువుల ప్రాణాలు పోతున్నాయి కావున రైతులు పంట రక్షణకు విద్యుత్ కంచెను ఏర్పాటు చేయకూడదని అలాగే అనధికారికంగా మోటార్ లు బిగించి వాడరాదని సూచించారు.
- e. విద్యుత్ కనెక్షన్ తీసుకునేప్పుడు నాసిరకం మెటీరియల్ వాడడం ప్రమాదకరం కనుక నాణ్యమైన పరికరాలను వాడాలని కోరారు.
- f. వర్షాలవల్ల లీకేజీ లు ఏర్పడి ఎర్ట్ దెబ్బతిని తీగలు తెగిపోయి ప్రమాదాలు చోటుచేసుకుంటున్నాయి కావున ప్రజలు ముఖ్యంగా గ్రామీణ ప్రజలు వర్షాకాలం లో తగిన జాగ్రత్తలు తీసుకోవాలని కోరారు.

		<p>g. గాలి దుమారం వంటి ప్రకృతి వైపరీత్యాల వాళ్ళ కరెంట్ స్టంబాలు నేలకొరుగుతాయని, తీగలు తెగిపోతాయని, ట్రాన్స్ ఫార్మర్లు ధ్వంసం అవుతాయని ఇటువంటి సమయం లో ప్రజలు అప్రమత్తంగా ఉండాలన్నారు. విద్యుత్ అధికారులకు సమాచారాన్ని వెంటనే చేరవేస్తే వారు సకాలం లో తగిన చర్యలు తీసుకోని ప్రమాదాలు నివారిస్తారు</p> <p>h. రైతులు డిస్ట్రిబ్యూషన్ ట్రాన్స్ఫార్మర్ ల వద్ద అనధికారికంగా ప్యూస్ లు మార్చడం, రిపేర్లు చేయడం, ఏబి స్విచ్ లు ఆపరేట్ చేయడం వల్ల ప్రమాదాలు జరుగుతున్నాయన్నారు. విద్యుత్ సంబంధిత సమస్యలను 1800 425 0028 టోల్ ఫ్రీ నెంబర్ కు లేదా 1912 నెంబర్ కు ఫో మెసేజ్ ద్వారా తెలపగలరని కోరారు.</p> <p>1 నుంచి ఏడు రోజులపాటు NPDCL పరిధిలోని అన్ని సర్కిళ్లలో విద్యుత్ భద్రత వారోత్సవాలు నిర్వహించి అవహగాహన గోడ పత్రికలు, కరపత్రాలు, విద్యుత్ సిబ్బందికి భద్రతా సూత్రములు(మినీ బుక్ లాట్స్) పంపిణీచేయడం జరుగుతున్నది. భద్రత చర్యలు , జాగ్రత్తలు తీసుకోవాలని ప్రతి జిల్లా , మండల , గ్రామ సమావేశాలలో విన్నవించటం జరుగుచున్నది.</p> <p>రైతు తన యొక్క పొలమునకు ఏర్పాటు చేసిన విద్యుత్ కంచె ద్వారా విద్యుత్ షాక్ తగిలి మనుషులు లేదా జంతువులకు ప్రమాదం జరిగినప్పుడు ఆ పొలం యజమాని పై Plocie station లో 135 IND ELE ACT, 304(ii) IPC Section క్రింద FIR</p>
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		నమోదు చేయబడుచున్నది. ఇంత వరకు 2022-23 సంవత్సరంలో 17 కేసులు మరియు 2023-24 సంవత్సరంలో ఇప్పటి వరకు 1 కేసు నమోదు చేయబడినవి.
6	<p>S.O.P. లో D.T.R. రిపోర్టింగ్ నగరాల్లో 24 గంటలు గ్రామాల్లో 48 గంటలుగా ఉన్నది. నగరాలలో వినియోగదారుల నుండి ఎటువంటి సహాయాన్ని ఆశించకుండానే నిమిషాలు లేక గంటలలో విద్యుత్ పునరుద్ధరణ చేస్తున్నారు గ్రామాల్లో కూడా 24 గంటలలో విద్యుత్ సరఫరా పునరుద్ధరణ జరిగేటట్లు చర్యలు . కానీ గ్రామాల్లో క్షేత్రస్థాయి సిబ్బంది అలసత్వం, అవినీతి వల్ల కావచ్చు. ఇంకేదైనా కారణం కావచ్చు, విద్యుత్ సరఫరా పునరుద్ధరణ ఆలస్యం అవుతుంది అనేది వాస్తవం. D.T.R ట్రాన్స్ఫర్మ్ గ్రామీణ వినియోగదారులు (రైతులు) చేస్తున్నారని A.R.R. లో తెలిపారు. అంటే రైతులే కాలిపోయిందని గుర్తించి. డిస్కం సిబ్బంది దృష్టికి తీసుకువచ్చి, వారు మేము నిస్సహాయులమని తెలిపిన తరువాత ఎవరో ఒకరు రైతులందరినీ ఒక్కటిగా చేసి, డబ్బులు జమచేసి, వాహనం మాట్లాడి T-Note వ్రాయించి, ఇతర ఇబ్బందులన్నీ పడి బిగించిన తరువాత, విద్యుత్ సరఫరాకు పునరుద్ధరణ జరిగే అవకాశం ఉంది.</p> <p>గ్రామాల్లో వల్ల డబ్బులు వసూలు చేసేవారు. ఇవ్వని వారిపై దౌర్జన్యం చేసేవారు. ఇలాంటి సివిల్, క్రిమినల్ పంచాయతులు కూడా జరిగే అవకాశం ఉంటుంది. డబ్బు వసూలు చేసిన వారు కొంత ఎక్కువ వసూలు చేసి, ఎవరికి ఇవ్వాలిని వారికిచ్చి కష్ట పడ్డందుకు అలుపు తీర్చుకునే</p>	<p>కాలిపోయిన DTRలను మార్చడానికి పట్టే సమయాన్ని తగ్గించడానికి ప్రత్యేకంగా గ్రామీణ ప్రాంతాల్లో సరిపోను ఆరోగ్యవంతమైన DTR లను DTR మరమ్మతు కేంద్రాల వద్ద ఏర్పాటు చేయబడ్డాయి దాదాపు అన్ని సబ్ డివిజన్లలో DTR మరమ్మతు కేంద్రాలు ఉన్నాయి.</p> <ol style="list-style-type: none"> వినియోగదారులకు అందుబాటులో TSNPDCL app లో Report on incident ద్వారా Photo పెట్టుట మరియు ఏమైనా ఫిర్యాదులున్న తెలియజేయుట కోసం ఏర్పాటు చేయబడింది . DTR కారణం గా ఏమైనా విద్యుత్ అంతరాయం ఉన్నచో స్థానిక సిబ్బందికి లేక పై అధికారులకు తెలియచేసినచో వెంటనే చర్యలు తీసుకోని విద్యుత్ సరఫరా పునరుద్ధరణ చేయబడుతుంది. అయితే లోపభూయిష్ట DTR కారణంగా సరఫరా అంతరాయాలను వినియోగదారులు టోల్ ఫ్రీ నంబర్: 18004250028 లేదా 1912 ద్వారా తెలియజేయవచ్చు అందుబాటులో ఉన్న మొత్తం ఆరోగ్యవంతమైన ట్రాన్స్ఫార్మర్లు :4111 అందుబాటులో ఉన్న మొత్తం రోలింగ్ స్టాక్:10,282.

	<p>కార్యక్రమాలు కూడా ఉంటాయి. చివరికి డబ్బు వసూలుకు మాకు ఎటువంటి సంబంధం లేదని డిస్కం కేత్రస్థాయి సిబ్బంది వాస్తవమే అని చెబుతున్నారు. గ్రామీణ వినియోగదారులను రెండవ తరగతి వినియోగదారులుగా పక్షపాత ధోరణితో చూడరాదు. రోడ్లు రవాణా అభివృద్ధి అయినందున, రైతుల సహకారం కూడా దొరుకుతుంది. కావున 24 గంటలలో D.T.R. మార్పిడి చేసే విధంగా కమిషన్ వారు చర్యలు గైకొనాలని ప్రార్థిస్తున్నాం.</p>	
7	<p>D.T.R. మీటర్ల పెట్టు ఓ గురించి, 2022-23 Tariff Order లో ఇచ్చిన ఆదేశం 18 సంబంధించిన సమాధానం A.R.R. SPDCL నెం. 21లో R.E.C. 93.0 కోట్ల అప్పు కొరకు వినతిపత్రం ఇచ్చాము అని తెలిపారు. NPDCL వారు 378.55 కోట్ల మీటర్లకు రూ.136.16 కోట్ల మీటర్ల నిర్వహణ కొరకు ఖర్చు కాగలదు. ఇది భారమైన విషయము. చర్చించాల్సి ఉంది అని తెలిపారు. టి.ఆర్.లకు మీటర్లు బిగించే బదులు (Dedicated Feeder) వ్యవసాయ సమర్పిత లైన్లకు సబ్-స్టేషన్ల నేమీటర్లను బిగించే ఏర్పాటు చేసినట్లయితే సంఖ్య తగ్గుతుంది కావున ఖర్చు తగ్గే అవకాశం ఉంటుంది. మీటర్లు రక్షణ ఉంటుంది. మెయింటనెన్స్ కూడా తగ్గుతుంది ఫీడర్లకు అవకాశం లేని చోట పేరెంట్ D.T.R. వద్ద కానీ ఇతర అనువైన స్థలంలో కానీ ఏర్పాటు చేయవచ్చునని మా సూచన. ఇట్టి విషయమై డిస్కం వారు మరియు గౌరవ కమిషన్ వారు చొర వతీసుకోవాలని కోరుచున్నాము.</p>	<p>3533 AGL 11KV ఫీడర్లలో, 628No.s ఫీడర్లు వేరు చేయబడ్డాయి. RDSS పథకంలో మొత్తం ఫీడర్ల విభజన కోసం రూ. 1755.14 కోట్ల ప్రతిపాదించబడింది కానీ పథకం ఇంకా మంజూరు కావలసి ఉంది. పథకం మంజూరయ్యాక పనులు చేపడతాం.</p>

<p>8</p>	<p>Toll Free నెంబర్లు 18004253600, 18004250028 గల వాటికి చేస్తే A.E. గారికి తెలిపారా అని ప్రశ్నిస్తున్నారు. Toll Free నెంబర్లు చేస్తే విధిగా Complaint Book చేసుకొని, రిజిస్టర్ నెంబర్ వెంటనే జారీచేసి పని జరిగితేంత వరకు తగిన చర్యలు తీసుకోవాలి. Toll Free నెంబర్లను ప్రచారం చేయాలి. D.T.R. వద్ద Bill Collection Centres ల వద్ద అన్ని డిస్కమ్ ఆఫీస్లలో కూడా. వ్రాయించాలి. Toll Free నెంబర్ వారి నుండి సరియైన స్పందన (Response కు సమస్య పరిష్కారం కానట్లయితే Toll Free నెంబర్లు సంబంధించిన ఉన్నతాధికారులు నెంబర్లు కూడా తెలియపరచాలి. Discom వారి ఏకీకృత Toll Free నెంబర్లను ప్రోత్సహించాలి.</p>	<p>వినియోగదారులకు TSNPDCL యొక్క టోల్ ఫ్రీ నంబర్లు 18004250028, 1912 కు చేసిన వెంటనే కంప్లెయింట్ రిజిస్టర్ చేసుకొని రిజిస్ట్రేషన్ ID ఇవ్వడం జరుగుతున్నది మరియు కంప్లెయింట్ అయ్యే వరకు ఆ AE గారితో మాట్లాడి సమస్య పరిష్కారం అయ్యక వినియోగదారుల అభిప్రాయం తీసుకొని కంప్లెయింట్ చేయటం జరుగుతున్నది. టోల్ ఫ్రీ నంబర్లను వినియోగదారులకు అనుకూలంగా, డివిజన్, సర్కిల్, ఈ.ఆర్.ఓ. మరియు పంచాయతీరాజ్ ఆఫీస్ ల ముందు బ్యానర్ల పై వ్రాయించడమైనది. అలాగే కంపెనీ సైట్, మొబైల్ యాప్ మరియు సీసీ లో కూడా పొందుపర్చడం అయినది.</p>
<p>9</p>	<p>Cost of Service Category wise A.R.R. లో చూపించారు. Cost of Service లో ఏ ఏ Component లు లెక్కిస్తారు ఉదా : విద్యుత్ కొనుగోలు, మౌళిక వసతులు ఉదా : విద్యుత్ స్తంభాలు, Conductor, D.T.R.లు, సబ్-స్టేషన్లు లాంటివి ఉంటాయా ఏమి ఏమి ఉంటాయో తెలియజేయగలరు.</p>	<p>Cost of Service Category wise లో సమగ్ర ఆదాయ ఆవశ్యకతలో కలసివున్న డిస్ట్రిబ్యూషన్ వ్యయం (O&M ఛార్జీలు, ROCE, తరుగుదల, స్పెషల్ అప్రోప్రియేషన్, ఆదాయంపై పన్ను), ట్రాన్సిమిషన్ ఛార్జీలు, SLDC ఛార్జీలు, PGCIL ఛార్జీలు, విద్యుత్ కొనుగోళ్ళ వ్యయం, వినియోగదారుల డిపాజిట్ల పై వడ్డీ మరియు సప్లయ్ మార్జిన్ ఉంటాయి. ఈ మొత్తం వ్యయాన్ని (ARR) వినియోగదారులు వాడుకునే లోడ్, వాడుకునే ఎనర్జీ, మరియు వినియోగదారులు రకముని బట్టి Cost of Service Category wise నిర్ణయించటం జరుగుతుంది.</p>
<p>10</p>	<p>Additional Consumption Deposit (A.C.D) లు డిస్కమ్ వారు వసూలు చేస్తున్నారు ఏదో ఒకసారి అట్టి సర్వీస్ పై ఎక్కువ లోడ్ రికార్డు</p>	<p>గౌరవనీయమైన విద్యుత్ నియంత్రణ మండలి TSERC రెగ్యులేషన్ నెం.6(2004) ప్రకారం అదనపు సెక్యూరిటీ డిపాజిట్ (ACD) వినియోగదారుడు వాడుకున్న</p>

	<p>అయినదానిని లెక్కలోకి తీసుకుంటున్నామని తెలిపారు. సర్వీస్ గల ఇంటిలో శుభ, అశుభ సందర్భాలప్పుడు అదనపు వినియోగం అవుతుంది. అటువంటి సందర్భాలలో ముందస్తు అనుమతి తీసుకుంటే మినహాయిస్తామని ఒక ఉన్నతాధికారి తెలిపారు. ఈ విషయం వినియోగదారులకు తెలియదు. అయితే అశుభ సంఘటనలు జరిగినప్పుడు ఇది సాధ్యం కూడా కాదు. కావున ఒక సంత్రం వినియోగాన్ని లెక్కలోకి తీసుకుని గతం కంటే ఎక్కువ ఉంటే ఆ నిషప్తిలో A. C.D. లు కలెక్టు చేయవలసిందిగా తదనుగుణంగా వినియోగదారులపై పడుతున్న అదనపు భారాన్ని దృష్టిలో పెట్టుకొని నిర్ణయం తీసుకోవాల్సిందిగా గౌరవ కమిషన్ వారిని ప్రార్థిస్తున్నాము A.C.D. కట్టిన వారి కాంటాక్ట్ లోడ్ పెంచుతున్నట్లు గా అది బిల్లులో అవుతుందా డిస్కం వారు తెలియజేయగలరు.</p>	<p>అదనపు లోడును బట్టి (ACD) నిర్ణయించడం జరగదు. వినియోగదారుడు గత సంవత్సరము వినియోగించిన రెండు నెలల సగటు విద్యుత్ వినియోగ యూనిట్లకు సమానంగా సెక్యూరిటీ డిపాజిట్ను విద్యుత్ సంస్థ వద్ద నిల్వ ఉంచాలి. ప్రస్తుత బిల్లింగ్ విధానము ప్రకారంగా వినియోగదారుడు వినియోగించిన నెల తరువాత బిల్లు జారీ చేయడము అవుతున్నది మరియు బిల్లు జారీ చేసిన తరువాత 30 రోజుల లోపు బిల్లు చెల్లించడానికి వెసలు బాటు కలదు అనగా మొత్తం రెండు నెలల తర్వాత మాత్రమే వినియోగదారుడు తాను వినియోగించుకున్న విద్యుత్ కు ఛార్జీలను డిస్కం కు చెలిస్తున్నాడు</p> <p>కావున ఒక సంవత్సరంలో విద్యుత్ వినియోగదారుడు వారి సర్వీస్ పై వాస్తవంగా ఉండవలసిన సెక్యూరిటీ డిపాజిట్ ను 2 నెలల సగటు వినియోగ యూనిట్ల ఆధారంగా లెక్కించి నుంచి అంతకు ముందే వారి నూతన సర్వీస్ తీసుకున్నప్పుడు చెల్లించిన డిపాజిట్ ను మరియు అదనపు లోడ్ పెంచినప్పుడు తీసుకున్న సెక్యూరిటీ డిపాజిట్ ను మినహించగా వచ్చిన నికరమొత్తాన్ని అదనపు సెక్యూరిటీ డిపాజిట్ గా (ACD) లెక్కిస్తారు.</p> <p>ఇట్టి డిపాజిట్ పై రిజర్వ్ బ్యాంక్ ఆఫ్ ఇండియా నిబంధనల ప్రకారం ప్రతి సంవత్సరం వడ్డీని లెక్కించి నెల బిల్లు లలో సర్దుబాటు చెయ్యడం జరుగుతుంది.</p>
11	O.R.C Agricultural Service కు మెటీరియల్ ధరలు పెరిగాయని,	వ్యవసాయ కనెక్షన్ల విడుదల కోసం TSNPDCL ద్వారా చేయవలసిన వ్యయంపై

<p>O.R.C. వేలాది రూ.లు. లక్షలాది రూ.లు కట్టమని తెలుపుతున్నారు. అసలు మౌళిక సదుపాయాలైన Polls, కండక్టర్, ఇతరత్రాలు ఎవరు ఏర్పాటు చేయాలి? అది ఎవరి ఆస్తి? వినియోగదారులు డబ్బులు చెల్లించిన మేరకు వినియోగదారునికి, యాజమాన్య హక్కులు ఉంటాయా? తెలియజేయగలరు. మెటీరియల్ ధరలకు వినియోగదారునికి సంబంధం) ఏమిటి? గతంలో ఒక D.D. కడితే సుమారు 3 పోల్సు సరియే సామాను తెచ్చి Install చేసేవారు ధరలు) పెరిగితే, మేము చెల్లించే D.D. సుమారు 6,000 రూ.లను ఆ నిప్పత్తిలో 10 లేక 20 శాతం పెంచాలి. కానీ O.R.C. పేరు లక్షలాది రూ.లు రైతు వినియోగదారుల పైన వేయరాదు. గతంలో ఇచ్చినంత మెటీరియల్ ప్రస్తుతము మరియు భవిష్యత్తులో కూడా ఇవ్వాలి.</p> <p>ఇట్టి విషయమై తగిన చర్యలకు ఉపక్రమించవలసిందిగా గౌరవ కమిషన్ వారిని ప్రార్థిస్తున్నాము</p>	<p>వ్యవసాయ అంచనాలను మంజూరు చేసేటప్పుడు సూపరింటెండింగ్ ఇంజనీర్/ఆపరేషన్ లకు ఈ క్రింది సూచనలు జారీ చేయబడ్డాయి.</p> <ol style="list-style-type: none"> 1. అంచనాలో టి లైన్, ఎల్ టి లైన్ మరియు డిటిఆర్ ఉంటే, TSNPDCL ద్వారా భరించాల్సిన వ్యయం ఒక్కో సర్వీసుకు రూ.50,000/- నుండి రూ.70,000/- పెంచబడినది. 2. అంచనాలో కేవలం LT లైన్ మాత్రమే ఉన్నట్లయితే, TSNPDCL ద్వారా భరించాల్సిన వ్యయం ప్రతి సర్వీసుకు రూ.32,000/- నుండి రూ.45,000/- వరకు పెంచబడినది. 3. వాడుకలో ఉన్న డిపార్ట్మెంట్ నిబంధనల ప్రకారం వినియోగదారుడు పికి డెవలప్ మెంట్ ఛార్జీలు రూ.1200/- మరియు రూ.60/- సెక్యూరిటీ డిపాజిట్ ఛార్జీలు చెల్లించాలి. <p>మిగిలిన ORC రూపంలో వినియోగదారుడు భరించాలి మరియు ORC చెల్లించిన తర్వాత డిపార్ట్మెంట్ మెటీరియల్ డిపార్ట్మెంట్ పనిని చేపడుతుంది. పనిని పూర్తి చేసిన తర్వాత మెటీరియల్ పై కాబోయే వినియోగదారుకు హక్కు ఉండదు.</p> <p>కేవలం రేట్ల సేకరణకు అనుగుణంగా మెటీరియల్ రేట్లు ఎప్పటికప్పుడు మారుతూ ఉంటాయి.</p>
<p>12 Over Dues Over 50,000/- Over 6 నెలలు : TS SPDCL. వారికి 6 నెలలుకు 50 వేలు పైబడిన L.T. మరియు H.T. బాకీలు మొత్తం 8 వేల 717 కోట్ల 98 లక్షల 38 వేలుగా నెం. 286 ఫార్మాట్ నెం. 9 (ఎ) లో</p>	<p>(a) H.T IV(A) Irrigation Category నుండి రూ"5131.7 కోట్లు బకాయిలు ప్రభుత్వ ఆధ్వర్యంలో నడిచే Lift Irrigation Scheme సర్వీసులు H.T IV(A) మరియు రక్షిత మంచి నీటి పథకాల సర్వీసుల HT. IV (B) -</p>

చూపించారు. ఇందులో ఎక్కువ మొత్తం Category H.T.-IV Irrigation కు సంబంధించినది. 4 వేల 869 కోట్ల 90 లక్షల 7 వేలుగా మరియు H.T.-1 Industry బాకీ 3 వేల 437 కోట్ల 47 లక్షల 32 వేలుగా చూపించారు. H.T.-IV మరియు H.T. 1 మొత్తం బాకీ కలిపితే 8 వేల 307 కోట్ల 38 లక్షల 3 వేలుగా ఉంది. మొత్తం బాకీ అయిన 8 వేల 717 కోట్ల 98 లక్షల 38 వేల నుండి తీసివేయగా ఇతర అన్ని Category బాకీ మొత్తం 410 కోట్ల 60 లక్షల 35 వేలు మాత్రమే. ఇందులో అధిక మొత్తం బాకీ రాష్ట్ర ప్రభుత్వం చెల్లించాల్సింది తరువాత పరిశ్రమల వారు చెల్లించాలి. మరి రెండు వర్గాల వారు కూడా డిస్కంట్లకు అందుబాటులో ఉండేవారే. ఎందుకు వసూలు చేయలేక పోతున్నారో డిస్కంట్ వారు తెలియజేయాలి. సత్వరమే ఇట్టి బాకీలు వసూలు అయ్యేవిధంగా చట్టపరమైన చర్యలు చేపట్టాలి తగిన చర్యలు తీసుకువలసిన గౌరవ కమిషన్ వారిని ప్రార్థిస్తున్నాము

NPDCL H.T. IV Irrigation 5,131. 71 కోట్లు మరియు H.T.-1 పరిశ్రమల వారికి 1,071,53 కోట్లు గా ఉన్నది.

SPDCL – Rs. 4869.907 Crores + NPDCL Rs. 5131.710 Crores

= Total Rs. 10,001.617 Crores

మొత్తం అమౌంట్ : 10 వేల కోట్ల పైగా రెండు డిస్కంట్లకు కలిపి HT-IV క్యాటగిరీకి రాష్ట్ర ప్రభుత్వము చెల్లించాల్సి ఉంది.

CPWS Schemes నుండి రావలసి ఉన్నది. ఈ బకాయిల వసూలుకు TSNPDCL నుండి పై రెండు శాఖాధిపతులకు (HOD) తరుచు వారి దృష్టికి ఉత్తరాల ద్వారా మరియు D.O Letters ద్వారా బకాయిలు చెల్లించమని కోరడం అయినది. ఈ రెండు క్యాటగిరీ సర్వీసులు H.T IV (A) & IV (B) ప్రజలకు సాగునీరు మరియు రక్షిత త్రాగునీటిని అందించే పథకాలకు సంబంధించినవి కావడం వలన ఇట్టి సర్వీసులు Disconnect చేసినట్లయితే ప్రజలు ప్ర అసౌకర్యానికి మరియు ఇబ్బందులకు గురి అవుతారు. కాబట్టి ఈ సర్వీసుల శాఖాధిపతులకు బకాయిలు చెల్లించమని కోరడం జరిగింది.

- (b) H.T-I పరిశ్రమల వారిని రూ.1071.53 కోట్లు TSNPDCL కు రావాల్సి ఉన్నది. ఈ మొత్తం బకాయి వివరాలు క్రింద ఇవ్వడం జరిగినది.
- i) ప్రభుత్వం ఆధ్వర్యంలో నడిచే పురపాలక సంఘాల బకాయిలు రూ|| 115.81 కోట్లు
 - ii) HMWS & SSB Services రూ|| 591.13 కోట్లు.
 - iii) కోర్టు కేసులు (Supreme Court and High Court) వున్న సర్వీసుల బకాయిలు రూ||273.54 కోట్లు
 - iv) Other Disconnected Services రూ||41.23 కోట్లు

<p>H.T.-I Industrial SPDCL Rs. 3,437.47 Crores + NPDCL Rs. 1,071.53 Crores = Total 4,509.00 Crores</p> <p>మొత్తం అమౌంట్ : 4 వేల 5 వందల కోట్ల పైగా రెండు డిస్కంలకు కలిపి HT.-I క్యాటగిరీకి పరిశ్రమలు చెల్లించాల్సి ఉంది.</p> <p>రాష్ట్ర ప్రభుత్వము, పరిశ్రమల వారు కలిపి సుమారుగా 15 వేల కోట్ల రూపాయలు రెండు డిస్కంలకు కలిపి బాకీ కలిగి ఉన్నారు. సామాన్య వినియోగదారులు ఒక నెల బిల్లు నుడ్యూ డేట్ తరువాత వెంటనే విద్యుత్ సరఫరాను నిలిపి వేస్తారు.</p>	<p>iv) ఇతర ప్రభుత్వ సర్వీసుల బకాయిలు రూ॥49.82 కోట్లు</p> <table style="margin-left: auto; margin-right: auto;"> <tr> <td style="text-align: center;">Total</td> <td style="text-align: center;">రూ॥ 1071.53 కోట్లు</td> </tr> </table> <p>క్రమ సంఖ్య i) లో ఉదహరించిన బకాయిలు రూ॥ 115.810 కోట్లు పురపాలక సంఘాల ఆధ్వర్యంలో నగర ప్రజలకు నీటి సరఫరా చేసే సర్వీసుల పై ఉన్నవి. ఈ బకాయిల చెల్లింపు కొరకు సంబంధిత మున్సిపల్ కమిషనర్ లకి మరియు డైరెక్టర్, మున్సిపల్ అడ్మినిస్ట్రేషన్ వారికి D.O Letters ద్వారా కోరడమైనది.</p> <p>క్రమ సంఖ్య. ii)లో చెప్పినట్లు రూ॥ 591.13 కోట్ల బకాయిలు HMWS & SB ఆధ్వర్యంలో హైదరాబాద్ నగర ప్రజలకు నీటి సరఫరా చేసే బోర్డుకి సంబంధించినవి. ఈ బకాయిల చెల్లింపు కోసం సంబంధిత మేనేజింగ్ డైరెక్టర్, HMWS & SB, హైదరాబాద్ వారికి D.O Letter ద్వారా కోరడమైనది.</p> <p>క్రమ సంఖ్య iii)లో చెప్పినట్లు రూ॥ 273.54 కోట్ల బకాయిలు వివిధ కోర్టులలో (సుప్రీం కోర్టు, హైకోర్టు, NCLT మొదలైన) పెండింగ్ కేసులుగా, H.T.. కేటగిరీ-I సర్వీసుల పై ఉన్నవి. ఈ సర్వీస్ ల బకాయిలు కోర్టులలో పెండింగ్ ఉన్నందున ఈ సర్వీసుల కనెక్ట్ చేయడం సాధ్యంకాదు. అన్ని కోర్టులలో కూడా TSNPDCL సరైన కౌంటర్ అఫిడవిట్ దాఖలు (File) చెయ్యడం జరిగింది. ఈ సర్వీసుల పై కోర్టు తీర్పు ఇచ్చిన తర్వాత తగిన చర్యలు తీసుకోగలము అని తెలపడమైనది.</p> <p>క్రమ సంఖ్య iv) లో చెప్పినట్లు రూ॥ 41.23 కోట్ల బకాయిలు ఉన్న ఈ సర్వీసులను ఇది వరకే (already) కనెక్ట్ చెయ్యడం జరిగింది. ఈ సర్వీసుల</p>	Total	రూ॥ 1071.53 కోట్లు
Total	రూ॥ 1071.53 కోట్లు		

		<p>పై బకాయిలు వసూలు ఈ సర్వీసులను Revenue Recovery Act (RR Act) కింద రివ్యూ చెయ్యడం జరిగింది.</p> <p>క్రమ సంఖ్య V) లో చెప్పినట్లు రూ॥ 49.82 కోట్లు ఇతర ప్రభుత్వ కార్యాలయాలకు సంబంధించినవి. వీటి చెల్లింపు కొరకు సంబంధిత శాఖాధిపతులకు D.O Letters ద్వారా కోరడమైనది.</p>
13	<p>అగ్రికల్చరల్ సర్వీసులకు సంబంధించి రాష్ట్రప్రభుత్వం రైతాంగానికి ప్రీమియం, బాధ్యతతో చెల్లించే బిల్లు ఒక సర్వీసుకు ఎంత డిస్కం వారికి చెల్లిస్తున్నారో తెలియజేయాలి. రైతాంగం బిల్లు రాష్ట్ర ప్రభుత్వం చెల్లించేది. మాకు వెల్లడించినట్లయితే మేము మా ముఖ్యమంత్రి గారిపై మరియు ప్రభుత్వము వారిపై మరియు గౌరవంతో, కృతజ్ఞతా భావంతో ఉంటామని తెలియజేస్తున్నాము.</p>	<p>అగ్రికల్చరల్ సర్వీసులకు సంబంధించి రాష్ట్రప్రభుత్వం రైతాంగానికి రాష్ట్ర టారిఫ్ ఆర్డర్ ఆర్థిక సంవత్సరం 2022-23 ప్రకారం రూ॥ 6,736 కోట్లు టారిఫ్ సబ్సిడీ క్రింద ఇవ్వడానికి ఒప్పుకున్నది. అందులో TSNPDCL రూ॥ 5574 కోట్లు, TSSPDCL కు రూ॥ 872 కోట్లు మరియు RESCO సిరిసిల్లా కు రూ॥ 289 కోట్లు ఇవ్వడం జరుగుతుంది. TSNPDCL పరిధిలోని అగ్రికల్చర్ సర్వీసులకు వాడుకునే విద్యుత్ కు సంబంధించి ఒక యూనిట్ రూ॥ 7.70 లను టారిఫ్ ఆర్డర్ 2022-23 ప్రకారం రాష్ట్ర ప్రభుత్వం ఇస్తున్నది టారిఫ్ ఆర్డర్ 2022-23 ప్రకారం ఒక సర్వీసుకు సంవత్సరానికి సుమారుగా రూ. 41,882 లను (HP రూ.8.273) చొప్పున రాష్ట్ర ప్రభుత్వం చెల్లిస్తున్నది</p>
14	<p>SPDCL, A.R.R. నెం. 86లో Loose Spans 1 లక్షకు పైగా (Bent) వంగిన Polls సుమారు 55 వేలు HG Fuse 75 వేలకు పైగా, L.T. Fuse 51 వేలకు పైగా Fencing 14 వేలకు పైగా DT.R. Plinth సరిపోయేంత ఎత్తు లేనివి 9500 పైగా ఉన్నానని తెలుపుతూ పై Action Plan ప్రకటించారు. మొత్తం ఎప్పటి వరకు పూర్తిచేస్తారు</p> <p>NPDCCL, A.R.R. నెం: 85, 86 లో చాలా పనులు చేశామని</p>	<p>లూజ్ లైన్లు, బెంట్ , డిటిఆర్ స్లింట్ల ఎత్తు పెరగడం వంటి లోపాలను గుర్తించేందుకు ఫీల్డ్ ఆఫీసర్లు గ్రామాన్ని దత్తత తీసుకోవడానికి TSNPDCL కొత్త కార్యక్రమాన్ని ప్రారంభించింది. అన్ని గ్రామాల్లో పనులు పూర్తి చేసి లోపాలను సరిదిద్దడంతోపాటు అన్ని గ్రామాలు, పట్టణాలు పూర్తయ్యే వరకు ఇదే కార్యక్రమాన్ని కొనసాగించడం జరుగుతుంది. ఇది నిరంతర ప్రక్రియ పనికిరాని విద్యుత్ పరికరాలను మార్చి క్రొత్తవి వేయటం జరుగుతుంది.</p>

	<p>తెలిపారు. సుమారు 2 లక్షల పైగా స్తంభాలు, 1578 ట్రాన్స్ఫార్మర్ ఫ్లింట్ (గడ్డెలు) పునర్ నిర్మాణం చేశామని, Loose Spans 86 వేలకు పైగా సరిచేశామని తెలిపారు.</p> <p>ఇట్టి పనులు జరిగినట్లయితే అభినందనీయమే. ఇంకా ఏమైనా మిగిలినవి కూడా గుర్తించి, సంఖ్యను ప్రకటించి, పనులు పూర్తిచేయాలని కోరుతున్నాము.</p> <p>దీనిపై సత్వరమే చర్యలు తీసుకోవాలి. ముఖ్యంగా Loose Spam వల్ల అట్టి (Wires Conductors Tractors పై ఉన్న గడ్డికి తగిలి, నెత్తిన మంచం ఎత్తుకు వారికి కూడా గతంలో Conductor తగిలి చెందడం జరిగింది. Plinth తక్కువ ఎత్తులో ఉన్న కారణంగా పశువులు, మనుషులు దుర్మరణం చెందిన, చెందుతున్న సంఘటనలు ఉన్నాయి.</p>	
15	<p>C.G.R.F. కు వచ్చిన ఫిర్యాదులపై C.G.R.F. వారు ఇచ్చిన ఆర్డర్ విర్గీత సమయంలో అమలు చేయడం లేదు. C.G.R.F. వారు ఇచ్చిన ఆర్డర్ పైన C.G.M. Operations అధికారి పర్యవేక్షణ ఉండాలి. వినియోగదారుని నుండి పనిపూర్తి అయి సంతృప్తి చెందినట్లు గావ్రాత పూర్వకంగా తీసుకొని, C.G.R.F. కు పంపే ఏర్పాటు చేయాలి. ప్రతి మూడు మాసాలకు ఒకసారి C.M.D. గారు సమీక్ష చేయాలని కోరుతున్నాము.</p>	<p>C.G.R.F. కు వచ్చిన ఫిర్యాదులపై C.G.R.F. వారు ఇచ్చిన ఆర్డర్ విర్గీత సమయంలో అమలు చేయడానికి C.G.Ms. Operation/TSNPDCL వారి పర్యవేక్షణలో ఉన్నది. వినియోగదారుని నుండి పనిపూర్తి అయి సంతృప్తి చెందినట్లు గా వ్రాత పూర్వకంగా తీసుకొని, C.G.R.F. కు పంపే ఏర్పాటును పరిశీలిస్తాము. ప్రతి త్రైమాసముకు ఒకసారి C.M.D. గారు సమీక్ష చేయడము జరుగుతున్నది.</p>

16	<p>SPDCL Hyderabad South Circle లో మొత్తం వినియోగం ఎంత? ఎన్ని యూనిట్లు? ఎంత పర్సంటేజీ కలెక్షన్ వస్తుందో తెలియజేయగలరు. తక్కువ బిల్లు రావడానికి కారణాలు తెలపగలరు. SPDCL వారు మొత్తం బిల్లు రాబట్టడానికి తీసుకుంటున్న చర్యలు ఏమిటి?</p>	-
17	<p>వ్యవసాయ సర్వీసుల వద్ద రైతులు తమ పశువులకు నీరు అగ్రికల్చర్ సర్వీసును కమర్షియల్ మారుస్తామని డిస్కం అధికారులు తెలుపుతున్నారు. కానీ .ఎమ్. ఆర్. ఎయిర్పోర్టులో అడ్వర్టైజ్ మెంట్ క్యాటగిరీని విస్మరించారు. ఎల్.టి.లో అడ్వర్టైజ్మెంట్ క్యాటగిరీకి యూనిట్లు రూ.13 గా ఉన్నది. .టి.లో ఈ క్యాటగిరీ లేదు. ఎక్కువకు ఎక్కువ రూ.8 లకు మించి లేదు. ఇక్కడ క్యాటగిరీ అతిక్రమణ చేసినా లెక్కలోకి తీసుకోరు. హైదరాబాద్ సర్కిల్ అయితే అసలు సర్వీసులుండి బిల్లు చెల్లించకపోయినా, సర్వీసులు లేకుండా విద్యుత్ వినియోగం చేసుకున్నా, బిల్లు లను సక్రమంగా వసూలు చేయరు. అమృత ఆహారానికి ఆలవాలమైన పాడి పంట, పశువులపైన మాత్రం అధికారులు క్రౌర్యం చూపిస్తారు. వ్యవసాయంలో పాడిపంట రెండూ భాగమే అని గుర్తించి, రైతు స్థాయిలో పశువుల పెంపకాన్ని వ్యవసాయంగానే పరిగణించాలని గౌరవ కమిషన్ వారిని ప్రార్థిస్తున్నాము</p>	<p>లైసెన్స్ పరిధిలో లేని అంశం.</p>

Replies to the Objections/Suggestions raised on ARR & FPT for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 and Power Purchase true-up from FY 2016-17 to FY 2022-23(Prov) by Sri Bakka Judson, Madikonda, Kazipet, Warangal-506003

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	I am requesting not to approve the Rs. 16,000 Crores true-up charges proposed by Electrical Department.	This is under the purview of the Hon'ble Commission.

Replies to the Objections/Suggestions raised on ARR & FPT including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 and Power Purchase true-up from FY 2016-17 to FY 2022-23 (Prov) for Retail Supply Business by Sri Swamy Jaganmayananda, # 4-96/2, Gandhi Chowk, Husnabad, Kodangal Mandal, Vikarabad District, 509350.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
Part-A 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 should be filled up.	Pertains to TSSPDCL.
2.	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.	Pertains to TSSPDCL.
3.	A substation was sanctioned for Husnabad Village 6 years back, but no work has done on that till date.	Pertains to TSSPDCL.
4.	It is observed many a times that the ADE, AE, DE are closing the workbooks 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 to not providing sufficient material the contractor would complete based on the material given to him.	Pertains to TSSPDCL.
5.	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 maching material etc. This leads to delay in erection of DTR and giving rise to other problems. Therefore, it is suggested that:	All the materials are procured as per the indent of the field officers and also considering consumption pattern. In TSNPDCL the entire Store management system is computerized through SAP system and all the officers including

	<p>A. The entire stores management systems have to be computerized, and the applicant (farmer) should be able to track his application as in the case of any postal department, courier services, Amazon orders etc. A time frame needs to be stipulated for processing the consumer application at every stage of its processing and the levels of approval be reduced to the minimum.</p> <p>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.</p> <p>C. The consumer should be able to access the availability of the material available in the stores from anywhere through the website and alsodelivery time should be indicated to the consumer online.</p> <p>D. The stores incharge should be able to supply the indented material to the need office/Section/Sub-Division.</p> <p>E. 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.</p>	<p>ADEs & Des have access to know the availability of the material in every store</p>
6.	<p>Each district should be having stores for supply of material. There are no stores for all the new districts.</p>	<p>A new district stores has been established in Mancherial District for easy drawl of material by section officers, all the other centralized district stores are functioning satisfactorily. The suggestion will be examined keeping the constraint of increase in R&M expenditure.</p> <p>There are 6 No.s District stores available in TSNPDCL.</p> <ol style="list-style-type: none"> 1. Hanumakonda 2. Karimnagar 3. Khammam

		<p>4. Nizamabad 5. Nirmal 6. Mancherial</p> <p>New District stores , Warangal at Mulugu Road premises is under examination.</p>
7.	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 to act upon that immediately and resolve the issue.	Pertains to TSSPDCL.
8.	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 avoid scope for corruption.	At present this facility is not available in consumer APP. Will work on this requirement to make it available on APP/Portal.
9.	We have also asked the information about AB Switch and SG Set through an RTI letter to the Corporation PRO. Though we were informed that the switches have been fixed, there were some more transformers without AB Switch and SG Sets and Fencing.	Pertains to TSSPDCL
10.	Provide one van for each Transformer Repair Centre (SPM Center) so that the transformers are easily transported to the center and get it repaired and take it back for erection. Absence of this causing lot of hardship to the farmers and they have to incur lot of expenses for transportation of the DTR. Attend to it immediately.	At present all the sub divisions are having hired departmental vehicles for transportation of failed/repaired DTRs. In addition to the above 22 Nos. 3MT pickup Vans are provided to each operation divisions exclusively for transportation of sick DTRs.

11.	Please look into the works of PallePragathi and Pattana Pragathi works done so far. Spcifically in agriculture, no work has been done so far till date.	There is a lot of improvement in rectifying the defects and refurbishment the lines after taking of palle pragathi and pattana pragathi works. The suggestion will be considered positively.
12.	Please inform the no. of sub-divisions in which the Deendayal scheme has been implemented so far.	In 104 nos sub-divisions the Deendayal scheme is implemented.
13.	Transfer all the lines men and artisans in CSCs for every three years. The staff of CSC should be transferred to a different department/division not related to the CSC.	Pertains to TSSPDCL.
Part-B 1.	In order to avoid losses to the Discoms, the Government should pay their subsidy dues to the Discoms in time.	The State Government is releasing subsidy on time.
2.	The due to Discom from various Government departments is Rs. 20, 871 Crores. As reported in newspaper, the dues of some departments are as follows: i. Irrigation: Rs. 9268.21 Cr. ii. Panchayatraj and RWS: Rs. 6353.14 Cr. iii. Municipal Administration: Rs. 1502.86 Cr. iv. Metro Water Board: Rs. 2857.65 Cr. v. Central Govt.: Rs. 658.24 Cr. vi. Others: Rs. 230.93 Cr. Total:Rs. 20871.03 Cr.	The dues to TSNPDCL from various Government departments is Rs. 7,554.82 Crores. The dues of some departments are as follows: i. Irrigation: Rs. 5286.42 Cr. ii. Panchayatraj and RWS: Rs. 1259.11 Cr. iii. Municipal Administration: Rs. 156.10 Cr. iv. HMWS: Rs. 664.82 Cr. v. Central Govt.: Rs. 19.92 Cr. vi. Others: Rs. 158.45 Cr. Total:Rs. 7544.82 Cr.
3.	The billing machines: IRDA and IRPORT machines are supplied. If anyone/all of them are not working, SASA app should be used. Even this SASA also will not work in the absence of network/data. Due to this, billing is getting delayed. Hence, as in the case of NPDCL TAB phones should be	Android Mobile billing is being implemented. Billing is completed successfully on time with Android Mobile billing.

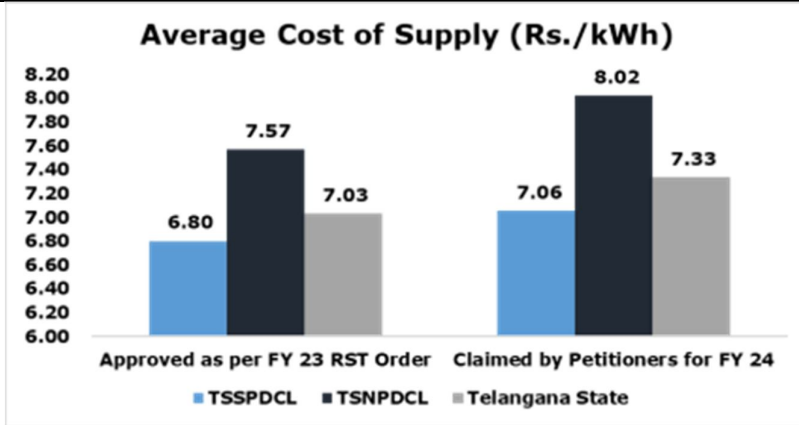
	provided. Alternatively provide IRDH and IRPORT machines. Or else provide smart meters as in the case of Gujrat to avoid billing problems.	
Part-C 1.	Dispense with the procurement, storage and supply of all the electrical equipments including transformers, switches, conductors, poles, matching, material etc. by the Department.	Dispense of procurement of the material required for electrical works by the department may lead to low quality materials and also may lead to deferment in technical parameters which may create complications in the electrical Systems.
2	Allow manufactures from whom you are sourcing the stores material to manufacture all the electrical equipments required for AGL, Industrial and Domestic consumers as per the specification stipulated by the Departments like ISI, FSSAI. Let the manufactures manufacture all the items required as per your stipulation and sell to the consumers with you quality logo.	For maintaining quality of the material and to ensure safety of electrical System and consumers, the procurement has to be done by the department only.
3.	Allow all the private contractors to fix the DTR or any other equipment or undertake any work related to fixing of the equipment and laying of the lines as per the guidelines standardized by the Departments.	Constant efforts have been made to improve the construction standards by strengthening the quality control department.
4.	The DISCOMs should open only the Advisery or Guidance Cells for advising the consumers based on their requirement for domestic/AGL/Industrial for procurement and installation of the materials as per their requirement either for domestic/AGL/Industrial use.	Dispense of procurement of the materials used for electrical lines/work by the department may lead to inflow of low quality materials and deferment in technical parameters which may creat complications in the system. For maintaining procurement of quality of material and to ensure safety of system and consumers it has to be maintained by department only. Further, all the materials procured are covered under warranty as per the requirement of the materials from 18 months to 5 years.
5.	It should limit its activities to the extent of bills for the power consumed and recovery of bills amopunts on monthly basis.	No Comments

6.	In case of any repairs required or replacement is required, the supplier of machinery or parts of equipment should attend to the same within the guarantee/warranty period. After the warranty period he can charge for repairs. Allow the manufactures to open their service centers.	In TSNPDCL all the materials procured are being covered under gurantee as per the requirement of the materials varies from 18 months to 5 years accordingly.
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Replies to the Objections/Suggestions raised on ARR & FPT including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 and Power Purchase true-up from FY 2016-17 to FY 2022-23 (Prov) for Retail Supply Business by Sri Anil Agarwal, President of FTCCI Federation House, Federation Marg, # 11-6-841, Red Hills, Hyderabad-500004.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>STATEMENT OF OBJECTIONS</p> <p>The Distribution Licensees namely Southern Power Distribution Company of Telangana Limited and Northern Power Distribution Company of Telangana Limited (hereinafter referred to as the 'Discoms' or 'TS Discoms' or 'Petitioners' or 'distribution companies' or 'Licensees') have filed the Petitions for Power Purchase True up for FY 2016-17 to FY 2022-23 for the Retail Supply Business 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>These filings have been taken on record by Hon'ble Commission from O.P. No.82 of 2022 to O.P. No. 88 of 2022 for TSSPDCL and from O.P. No. 89 of 2022 to O.P. No. 95 of 2022 for TSNPDCL</p> <p>This Statement of Objections is being filed on behalf of 'The South Indian Cement Manufacturers' Association (SICMA)', an Association registered under Telangana Societies Registration Act 2001 at Hyderabad, its members being major Cement Manufacturers across South India (hereinafter called the —'Objector'. The main function of SICMA is to promote and protect the interests of its members in relation to the commerce & industries of India and in particular, the commerce & industries connected with cement. The members of the association are availing power supply from the licensees across the State of Telangana, predominantly at 132/220 KV voltage and few of them avail supply at 33 KV voltage.</p>	No Comments

	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.	
	The South Indian Cement Manufacturers' Association (Objector) strongly objects to the Filing of the ARR for the Retail Supply Business for FY 2022-2023 respectively (herein after referred to as the 'Tariff Petitions' or 'Petitions') and prays that the submissions and objections made herein may be accepted and approved by the Hon'ble Commission, in the interest of justice and equity	TS Discoms submit that the instant Petitions viz. O.P. No.80 of 2022 to O.P. No. 81 of 2022 for TSNPDCL & TSSPDCL deals about the ARR for the Retail Supply Business for FY 2023-2024 respectively.
	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. The brief facts, propositions, analysis, grounds and point wise objections to the Petitions are narrated herein below:	No Comments
1	AVERAGE COST OF SUPPLY (2022-23 VS 2023-24) i. In the instant Petitions, Licensees have projected a higher average cost of service than the approved in last Retail Supply order for the FY 2022-23. A comparison of the Average Cost of Supply (ACoS) claimed against that approved by Hon'ble Commission in the FY 2022-23 and also the provisional data for FY 2023-24 is shown below:	T The actual ACoS for FY 2021-22 for Telangana state is Rs. 7.32/kWh. The ARR projections by TS Discoms are done based on the actuals of FY 2021-22 and H1 of FY 2022-23 and estimated figures for H2 of FY 2022-23. Hence the projected ACoS for Telangana state for FY 2023-24 i.e., Rs. 7.33/kWh is only 0.1% increase over actual ACoS of FY 2021-22. Moreover, the Distribution cost and Transmission cost for FY 2023-24 which are components of ACoS were taken from the Distribution MYT Order for 4 th Control Period and Transco Transmission MYT Order for 4 th Control Period both approved by Hon'ble TSERC. The Distribution cost for FY 2023-24 is increased by 12% over the distribution cost approved by Hon'ble TSERC for FY 2022-23 and the Transmission cost for FY 2023-24 is also



ii. It is humbly pointed out from the charts that Licensees have projected an increase of around 4-6 % in the Average Cost of Supply (ACoS) for FY 2023-24 over the approved figure for FY 2022-23 respectively.

increased by 12% over the approved numbers for FY 2022-23.
Hence the overall ACoS for Telangana for FY 2023-24 has increased by 4% over FY 2022-23.

2 AGGREGATE REVENUE REQUIREMENT (ARR) CLAIMED BY TELANGANA DISCOMS FOR FY 2023-24

i) The TSSPDCL and TSNPDCL has projected an Annual Revenue Requirement of Rs. 36,963.20 Crores and Rs. 17,095.16 Crores respectively for FY 2023-24. The ARR along with its treatment proposed by the TSSPDCL and TSNPDCL is provided in the table below:

Particulars	TSSPDCL	TSNPDCL	TOTAL
Transmission Cost	2,670.27	1,126.29	3,796.56
SLDC Cost	32.81	13.69	46.50
Distribution Cost	5,168.36	4,081.42	9,249.78
PGCIL & ULDC Expenses	1,081.98	451.19	1,533.17
Network and SLDC Cost (A)	8,953.42	5,672.60	14,626.02

No Comments

Power Purchase / Procurement Cost	27,654.99	11,310.21	38,965.20
Interest on Consumer Security Deposits	311.96	81.08	393.04
Supply Margin in Retail Supply Business	42.83	31.27	74.10
Other Costs if any	-	-	-
Supply Cost (B)	28,009.78	11,422.56	39,432.34
Aggregate Revenue Requirement (A+B)	36,963.20	17,095.16	54,058.35
Non-Tariff Income	28.18	33.81	61.98
Net Revenue Requirement	36,935.02	17,061.35	53,996.37
Total Revenue	33,724.37	9,737.70	43,462.07
Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)	33,521.34	9,737.70	43,259.04
Revenue from Cross Subsidy Surcharge	100.80	-	100.80
Revenue from Additional Surcharge	102.23	-	102.23
Revenue Deficit(-)/Surplus(+) at Current Tariffs	-3,210.64	-7,323.65	-10,534.30
Government Subsidy u/s 65 of the Electricity Act, 2003	-	-	-
Net gap – Deficit(-)/Surplus(+)	-3,210.64	-7,323.65	-10,534.30

	<p>ii) The Objections in respect of the ARR projected by the Petitioners for FY 2023-24 are summarised below:</p>																																	
<p>3</p>	<p>SALES PROJECTIONS:</p> <p>i) The Petitioners, in the instant petitions have escalated sales quantum for HTIV (A) Lift Irrigation & Agriculture at 132 kV for FY 2023-24 by 108%-298% against over the estimated values of FY 2022-23:</p> <table border="1" data-bbox="262 488 1230 651"> <thead> <tr> <th>TSSPDCL</th> <th>FY 22</th> <th>FY 23</th> <th>FY 24</th> </tr> <tr> <th>HT Category at 132 KV</th> <th>Actuals</th> <th>Estimates</th> <th>Estimates</th> </tr> </thead> <tbody> <tr> <td>HT-IV A Lift Irrigation & Agriculture (MUs)</td> <td>1877.73</td> <td>1821.45</td> <td>3786.40</td> </tr> <tr> <td>Percentage Increase (%)</td> <td></td> <td>-3%</td> <td>108%</td> </tr> </tbody> </table> <table border="1" data-bbox="262 711 1230 873"> <thead> <tr> <th>TSNPDCL</th> <th>FY 22</th> <th>FY 23</th> <th>FY 24</th> </tr> <tr> <th>HT Category at 132 KV</th> <th>Actuals</th> <th>Estimates</th> <th>Estimates</th> </tr> </thead> <tbody> <tr> <td>HT-IV A Lift Irrigation & Agriculture (MUs)</td> <td>1792.65</td> <td>932.08</td> <td>3712.74</td> </tr> <tr> <td>Percentage Increase (%)</td> <td></td> <td>-48%</td> <td>298%</td> </tr> </tbody> </table>	TSSPDCL	FY 22	FY 23	FY 24	HT Category at 132 KV	Actuals	Estimates	Estimates	HT-IV A Lift Irrigation & Agriculture (MUs)	1877.73	1821.45	3786.40	Percentage Increase (%)		-3%	108%	TSNPDCL	FY 22	FY 23	FY 24	HT Category at 132 KV	Actuals	Estimates	Estimates	HT-IV A Lift Irrigation & Agriculture (MUs)	1792.65	932.08	3712.74	Percentage Increase (%)		-48%	298%	
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	<p>ii) The Petitioners have submitted that the reason for such increase is as follows: <i>“Lift Irrigation (LI) Schemes: The Telangana government has initiated the ambitious Kaleshwaram lift irrigation project along with the existing ones, to meet the needs of the agriculture consumers in the State. The growth trend in this category has many variations due to variations in the operation of Lift Irrigation pumps based on rainfall, water levels in reservoirs, etc. The sales in H1 of FY22-23 recorded a negative growth rate due to heavy rains in monsoon period. Further, due to heavy floods in August month the LIS pumps are not operated in H1 of FY 2022-23. Licensee has considered the expected additional loads and energy requirement for FY 2023-24 based on the information received from the I&CAD, which was further duly analyzed and moderated considering the</i></p>	<p>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>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 & Godavari river and upcoming additional loads. These loads are further</p>																																

	<i>licensee's experience of the historical consumption along with other allied factors."</i>																																								
	<p>iii) However, it is submitted that the project status of Kaleshwaram lift irrigation project is uncertain and that the high projections made by the Petitioners for Lift Irrigation category are highly optimistic. This can be inferred from several articles in LiveLaw and Hindustan Times that there is uncertainty regarding the fate of the Kaleshwaram lift irrigation project. The same have been annexed herewith as Annexure-II.</p>	<p>considered to be operating only at a 60% load factor by I&CAD department. However, TS Discoms, based on their analysis and historical experience have only considered half (50%) of the projections given by I&CAD department for HT 132 KV LIS category.</p> <p>Hence, the objector's computation of requirement by considering lesser LIS sales is not correct.</p>																																							
	<p>iv) Therefore, the Objector has recomputed the power purchase requirement for FY 2023-24 by considering the actuals sales corresponding to HT IV (A) category in FY 2021-22:</p> <table border="1" data-bbox="247 659 1230 1263"> <thead> <tr> <th colspan="3">Power Purchase Requirement (MUs) for FY 2023-24 as per Objector</th> </tr> <tr> <th>Particulars</th> <th>TSSPDCL</th> <th>TSNPDCL</th> </tr> </thead> <tbody> <tr> <td>Total Sales, MU</td> <td>50,444.21</td> <td>19,345.26</td> </tr> <tr> <td>Sales (LT, 11kV, 33kV) (MU)</td> <td>42,049.43</td> <td>16,213.63</td> </tr> <tr> <td>EHT Sales (MU)</td> <td>8,394.78</td> <td>3,131.63</td> </tr> <tr> <td>Total Losses, MU</td> <td>6,593.90</td> <td>2,752.89</td> </tr> <tr> <td>Distribution System Losses (MU)</td> <td>4,478.42</td> <td>1,927.25</td> </tr> <tr> <td>Transmission System Losses (MU)</td> <td>2,115.49</td> <td>825.63</td> </tr> <tr> <td>Total Losses, (%)</td> <td>11.56</td> <td>12.46</td> </tr> <tr> <td>Transmission Losses (%)</td> <td>3.71</td> <td>3.74</td> </tr> <tr> <td>Distribution System Losses (%)</td> <td>9.63</td> <td>10.62</td> </tr> <tr> <td>Input to Distribution System</td> <td>46,527.85</td> <td>18,140.88</td> </tr> <tr> <td>Power Purchase Requirement (MU)</td> <td>57,038.11</td> <td>22,098.15</td> </tr> </tbody> </table>	Power Purchase Requirement (MUs) for FY 2023-24 as per Objector			Particulars	TSSPDCL	TSNPDCL	Total Sales, MU	50,444.21	19,345.26	Sales (LT, 11kV, 33kV) (MU)	42,049.43	16,213.63	EHT Sales (MU)	8,394.78	3,131.63	Total Losses, MU	6,593.90	2,752.89	Distribution System Losses (MU)	4,478.42	1,927.25	Transmission System Losses (MU)	2,115.49	825.63	Total Losses, (%)	11.56	12.46	Transmission Losses (%)	3.71	3.74	Distribution System Losses (%)	9.63	10.62	Input to Distribution System	46,527.85	18,140.88	Power Purchase Requirement (MU)	57,038.11	22,098.15	
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4	<p>POWER PURCHASE COST:</p> <p>A. TSGENCO Thermal Power Stations:</p>																																								

<p>i) It is submitted that the fixed cost recovery of thermal generating stations is based on the availability declared by them i.e. Plant Availability Factor (PAF).</p>	<p>Projecting Fixed charges as per net availability by considering Plant load factor as given by objector is incorrect. TSDISCOMS projected the Fixed Charges of TSGENCO Thermal Stations as per Hon'ble TSERC approved TS GENCO MYT Order for 4th Control period and Variable charges by considering the base ECR rate computed by the Hon'ble Commission in 4th Control Period.</p>
<p>ii) The latest TSGENCO Tariff Order for 4th control period was issued on 22.03.2022 and the Fixed Charges for FY 2023-24 has been approved subjected to normative plant availability.</p>	
<p>iii) The Petitioner has claimed the complete fixed charges for TSGENCO stations as approved in TSGENCO MYT order dt. 22.03.2022 without showing any linkage with plant availability nor submitted any details about the same. Further, in this regard it is important to mention that since no true-up has been conducted for TSGENCO stations after FY 2019, hence it cannot be ascertained if the actual availability of the TSGENCO stations has been up to the normative level to enable complete fixed charge recovery as approved by the Hon'ble TSERC.</p>	
<p>iv) Additionally, TS Discoms has considered the capacity allocation from YTPS Unit I & II for FY 2023-24. The units YTPS I and YTPS II are expected to be commissioned on 1st Dec 2023 and 1stFeb 2024. The Hon'ble commission in its TSGENCO MYT order dt. 22.03.2022 has directed the TSGENCO to submit the proposal for determination of capital cost and Tariff for YTPS. The relevant extract and directive issued from the TSGECO MYT order dt. 22.03.2022 are reproduced below for reference:</p> <p><i>5.3.36 The Commission has discussed capital cost and capitalisation schedule of BTPS in detail in the subsequent Chapter of this Order. However, it is to be noted that the Commission has approved the capitalisation of BTPS only from the CoD of the Station as against the submission of TSGenco. Hence, the capitalisation approved for BTPS is from FY 2020-21 against the capitalisation submitted by TSGenco for FY 2019-20. <u>The Commission noted that TS Genco submitted the capital investment for YTPS (new station) in the Capital Investment Plan; however, TSGenco has not sought determination of capital cost & tariff for YTPS in the</u></i></p>	<p>The TS Discoms have considered the projections for availability of power quantum and the cost of power purchase from YTPS units 1 & 2 as per the Commissioning Dates as communicated by TS Genco in consultation with CMD Genco & Transco in November 2022 (during ARR & FPT filing).</p> <p>Hence, the YTPS Unit 1 availability is considered from Dec'22 and YTPS Unit 2 availability is considered from Feb'23 and the fixed cost and variable costs for these months were considered as received from TS Genco.</p>

<p><u>Petition. Therefore, the Commission has not considered the approval of capital cost for YTPS while approving the investment plan for FY 2019-20 to FY 2023-24. The Commission directs TSGenco to submit the proposal for determination of capital cost and Tariff for YTPS before its CoD as per the Regulations No.1 of 2019.</u></p> <p>"New Directives</p> <p>6. Scheme-wise Details of Capital Cost for New Stations</p> <p><i>The Commission directs TS Genco to submit the proposal for final capital cost and revised tariff for BTPS after commissioning of the final unit. The Commission also directs TS Genco to submit the proposal for determination of capital cost and Tariff for YTPS before its CoD as per the Regulations No.1 of 2019. TS Genco shall submit the scheme-wise capitalisation for new plants, viz., KTPS-VII, BTPS and YTPS with Financial Package, Time and Cost over-run for each station along with proper quantification of the cost over-run, justification for the time over-run and Financial Package-wise undischarged liabilities as on COD of the respective plant while filing the MTR Petition."</i></p>	
<p>v) To the best of our knowledge, the MTR filing dt. 30.11.2022 made by TSGENCO and information available on TSGENCO website do not provide any details/status about the YTPS capital cost approval and Tariff determination. Even the commissioning date of the units are in Dec'23 and Feb' 24.</p>	
<p>vi) In light of the above, the Objector has not considered any power procurement (MUs) from YTPS for computation of power purchase cost for FY 2023-24.</p>	
<p>vii) The detailed computation of Fixed cost for TSGENCO thermal station for both discoms as per Objector's Assessment is shown below:</p> <p>Disallowance Proposed in Fixed cost of TSGENCO Thermal as per Objector's Assessment</p>	

(All Figures in Crores)

Particulars	TSSPDCL	TSNPDCL	Total
Petitioner's Claim	4,004.21	1,671.49	5,675.70
Objector Assessment	3,439.16	1,435.60	4,874.76
Disallowance Proposed	565.05	235.89	800.94

TS Discoms have responded to the item-wise objections/suggestions 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.

Station	Plant Capacity	Net Availability	Normative Availability to be Considered as per Objector	Energy Dispatch	Fixed Cost approved in Tariff Order	Fixed Cost as per Petitioner	Fixed Cost as per Objector's Assessment
	MW	%	%	MU	INR Crore	INR Crore	INR Crore
TSGENCO Thermal							
KTPS D	500	73.00%	80.00%	3,197.39	381.03	381.03	347.69
KTPS Stage VI	500	74.00%	80.00%	3,250.14	517.45	517.46	478.64
RTS B	62.5	68.00%	80.00%	370.60	117.35	117.34	99.75
Kakatiya Thermal	500	74.00%	80.00%	2,796.89	416.04	416.03	384.84

Power Plant Stage I								
Kakatiya Thermal Power Plant Stage II	600	75.00%	80.00%	3,921.2 2	710.49	710.48	666.08	
BTPS - unit 1	270	78.00%	80.00%	1,844.5 7	473.55	473.55	461.71	
BTPS - unit 2	270	78.00%	80.00%	1,844.5 7	473.55	473.55	461.71	
BTPS - unit 3	270	78.00%	80.00%	1,844.5 7	473.55	473.55	461.71	
BTPS - unit 4	270	78.00%	80.00%	1,844.5 7	473.55	473.55	461.71	
Yadradri - TPS - I	800	79.00%	NA	1,841.1 8	NA	400.80	-	
Yadradri - TPS - II	800	79.00%	NA	905.50	NA	200.40	-	
KTPS VII	800	81.00%	80.00%	5,659.5 3	1,037. 97	1,037. 97	1,050.94	
Total TSGENCO Thermal	564 2.5			29,320 .74	5,074. 52	5,675. 70	4,874.78	
B. Central Generating Stations:								
i. It is pointed out that the Hon'ble Commission has not considered any capacity allocation from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. For FY 2023-24 in line with the earlier directions of the Commission in RST Orders for FY								

2017-18 and FY 2018-19. The relevant extracts from the past RST orders have been reproduced below for reference:

The Hon'ble Commission in its RST Order dt. 26.08.2017 for FY 2017-18 has stated as follows:

"3.3.17 To reduce the financial burden upon them, the Licensees submitted a requisition to Gol expressing its willingness to surrender the share of Telangana State from NTECL Vallur TPS. In view of the requisition made by the Licensees, the Commission also observes that NLC Tamil Nadu Power Ltd. is also a similar project with high cost of generation. The Commission thus directs the DISCOMs to surrender the allocated share of Telangana State in NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. Hence the Commission in this Order, has not considered the energy availability from these generating stations from 01.08.2017 onwards."

(Emphasis supplied)

The Hon'ble Commission in its RST Order dt. 27.03.2018 for FY 2018-19 has stated as follows:

"3.3.18 The Commission in its Tariff Order for FY 2017-18 dated 26.08.2017 directed the DISCOMs to surrender the allocated share of Telangana State in NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. and accordingly, had not considered the energy availability from these stations from 01.08.2017. The DISCOMs submitted that in response to their request for re-allocation of the share of Telangana State in NTECL Vallur TPS, there is no confirmation from the Ministry of Power, Gol to that effect. The DISCOMs also submitted that the re-allocation of the share in NLC Tamil Nadu Power Ltd. will be taken up after the re-allocation of share in NTECL Vallur TPS. The Commission observed that the DISCOMs are procuring power from NTECL Vallur TPS and NLC Tamil Nadu

The projection of availability and cost for the CGS generators (NTECL Vallur TPS and NLC Tamil Nadu Power Ltd) are based on the allocation by **Central Govt.** and availability received from respective power plant.

The Licensees submitted a requisition to MOP, Gol expressing its willingness to **surrender** the share of Telangana State from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. and it is under process.

PowerLtd. in FY 2017-18 and have proposed in FY 2018-19 also. In light of the directions in the Tariff Order for FY 2017-18, the Commission has not considered the share allocation to Telangana State from NTECLVallur TPS and NLC Tamil Nadu Power Ltd. for FY 2018-19.

(Emphasis supplied)

ii) The Hon'ble Commission in its RST order dt.23.03.2022 for FY 2022-23 has approved Power Purchase as follows by disallowing any Power Procurement from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd.:

Table 4-15 Power procurement cost from Central Generating Stations for FY 2022-23

Source	Claimed				Approved			
	Quantum MU	Fixed Cost Rs.crore	Variable Cost Rs.crore	Total Rs.crore	Quantum MU	Fixed Cost Rs.crore	Variable Cost Rs.crore	Total Rs.crore
Thermal								
NTPC Ramagundam Stage I & II	2683.01	188.60	690.63	879.22	2716.15	181.22	699.16	880.38
NTPC Ramagundam Stage III	721.42	57.15	182.20	239.35	729.22	53.89	184.17	238.06
NTPC Talcher TPS II	1638.93	117.79	284.28	402.07	1598.29	110.39	277.23	387.62
NTPC Simhadri Stage I	2251.89	478.57	707.56	1186.13	3672.35	356.75	1153.88	1510.63
NTPC Simhadri Stage II	1298.23	230.24	398.51	628.75	1765.35	245.11	541.91	787.02
NTPC Kudgi	1017.12	319.88	348.05	667.92	1751.40	294.24	599.31	893.55
NLC TPS II Stage I	395.60	27.08	104.54	131.63	385.93	28.10	101.99	130.09
NLC TPS II Stage II	710.07	50.12	187.82	237.95	692.64	52.26	183.21	235.47
NNTPP	402.72	68.24	88.03	156.28	392.73	78.22	85.84	164.06
ISTPP Unit 1	3499.63	790.92	794.42	1585.33	3412.84	711.82	774.72	1486.54
NTECL Vallur TPS	834.63	135.00	245.48	380.48	0.00	0.00	0.00	0.00
NLC Tamil Nadu Power Ltd.	1068.60	188.57	283.77	472.34	0.00	0.00	0.00	0.00
Sub Total	16521.83	2652.16	4315.29	6967.45	17116.91	2112.01	4601.41	6713.42
Nuclear								

iii) Despite clear past directives/methodology of the Hon'ble Commission, the TS Discoms have sought to procure power from these stations. It is humbly requested that the Hon'ble Commission may penalise the Discoms for not adhering to the directives specified.

<p>iv) The Objector in line with the Hon'ble Commission past followed methodology/directives has not considered any capacity allocation from these two generating stations for power purchase computation. It is prayed that the Hon'ble TSERC may do the same.</p>	
<p>C. Interest on Pension bonds: i) The Petitioners i.e. TSSPDCL & TSNPDCL have claimed an amount of Rs. 972.86 Crores and Rs. 406.11 Crores respectfully towards interest on Pension bonds for FY 2023-24.</p>	<p>No Comments</p>
<p>ii) It is a set principle that pension funds have to be maintained from the contributions of the management & employees and should be used appropriately to earn interest thereon. iii) It is inappropriate to load the inefficiency of erstwhile APSEB in managing funds on the end consumers in the form interest on Pension Bonds.</p>	
<p>iv) The Hon'ble Commission in its TSGENCO MYT Order dt. 22.03.2022 has also acknowledged the same i.e. additional burden of pension bonds should be funded by the Government of Telangana. The Hon'ble Commission Directive as per order dt. 22.03.2022 in this regard is reproduced below:</p> <p><i>"New Directives</i> 10. Liabilities on pension bonds The Commission directs TS Genco to extract the request of the stakeholder that the Government of Telangana shall bear the additional burden of pension bonds and communicate to the <i>Principal Secretary, Energy, GoTS for favourable consideration."</i> (Emphasis supplied)</p>	

	<p>v) Therefore, it is prayed that the claim of the Petitioners towards Interest on Pension Bonds may be disallowed and may be borne by the Government of Telangana.</p>																
	<p>D. Sale of Surplus Power: i) The Objector, after assessing the actual power purchase requirement for both discoms for FY 2023-24 (same has been discussed in detail in section 4 pertaining to sales projection in this report) and despatching the power in an economical manner has worked out the actual surplus/deficit (MUs) scenario for FY 2023-24.</p>	<p>TS Discoms have not considered any sale of surplus power in FY 2023-24 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>ii) For computation purpose following parameters discussed above are taken in consideration: i) Zero Despatch from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd; ii) Zero Capacity allocation from YTPS I & II; iii) Economical Power despatch in accordance to reduced power purchase requirement.</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 2016-17 to FY 2022-23, have already been submitted to the Hon'ble Commission, as part of the Additional information requested.</p>															
	<p>iii) Taking into account the above, the Objector has computed the actual overall energy scenario for FY 2023-24:</p> <table border="1" data-bbox="218 824 1255 1294"> <thead> <tr> <th data-bbox="218 824 898 915">Particulars for FY 2023-24</th> <th data-bbox="898 824 1094 915">TSSPDCL</th> <th data-bbox="1094 824 1255 915">TSNPDCL</th> </tr> </thead> <tbody> <tr> <td data-bbox="218 915 898 1006">Energy Availability (MUs)</td> <td data-bbox="898 915 1094 1006">65,750.47</td> <td data-bbox="1094 915 1255 1006">28,056.71</td> </tr> <tr> <td data-bbox="218 1006 898 1097">Energy Requirement (MUs)</td> <td data-bbox="898 1006 1094 1097">55,100.32</td> <td data-bbox="1094 1006 1255 1097">21,289.25</td> </tr> <tr> <td data-bbox="218 1097 898 1188">Surplus/deficit (MUs)</td> <td data-bbox="898 1097 1094 1188">10,650.14</td> <td data-bbox="1094 1097 1255 1188">6,767.46</td> </tr> <tr> <td data-bbox="218 1188 898 1294">Average of MCP for FY 22 and H1 of FY 23 (Rs/kWh)</td> <td data-bbox="898 1188 1094 1294">5.17</td> <td data-bbox="1094 1188 1255 1294">5.17</td> </tr> </tbody> </table>	Particulars for FY 2023-24	TSSPDCL	TSNPDCL	Energy Availability (MUs)	65,750.47	28,056.71	Energy Requirement (MUs)	55,100.32	21,289.25	Surplus/deficit (MUs)	10,650.14	6,767.46	Average of MCP for FY 22 and H1 of FY 23 (Rs/kWh)	5.17	5.17	<p>The calculation of the objector regarding the overall energy scenario is not correct for the following reasons:</p> <p>i. Zero Despatch from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd; - As responded in above section, until the surrender request for share allocated by Central Govt is not finalized, TS Discoms cannot project zero dispatch from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd.</p> <p>ii. Zero capacity allocation from YTPS -</p>
Particulars for FY 2023-24	TSSPDCL	TSNPDCL															
Energy Availability (MUs)	65,750.47	28,056.71															
Energy Requirement (MUs)	55,100.32	21,289.25															
Surplus/deficit (MUs)	10,650.14	6,767.46															
Average of MCP for FY 22 and H1 of FY 23 (Rs/kWh)	5.17	5.17															

Revenue generated by Sale of Surplus Power (Rs. Crores)	5,503.19	3,496.91	iii. Economical power desptch – The Energy requirement projections made by the objector are incorrect as they have projected lesser sales for LIS category.						
iv) The Summary of Disallowances in Power Purchase Cost as per the Objector's Assessment is summarized below:									
Power Purchase Cost as per Petitioner's Claim									
Particulars	State			TSSPDCL			TSNP DCL		
	2023-24			2023-24			2023-24		
	PP MU	PP Cost (INR Cr.)	PP Cost (INR/k Wh)	PP MU	PP Cost (INR Cr.)	PP Cost (INR/k Wh)	PP MU	PP Cost (INR Cr.)	PP Cost (INR/k Wh)
<i>TSGENCO Thermal</i>	29,320.74	13,418.89	4.58	20,685.78	9,467.03	4.58	8,634.96	3,951.86	4.58
<i>TSGENCO Hydel</i>	5,414.41	1,317.51	2.43	3,819.87	929.50	2.43	1,594.54	388.01	2.43
<i>CGS stations</i>	22,809.96	10,151.81	4.45	16,013.11	7,162.11	4.47	6,796.85	2,989.71	4.40
<i>APGPCL</i>	-	-	-	-	-	-	-	-	-
<i>IPPs (Thermal)</i>	2,650.58	2,207.19	8.33	1,869.99	1,557.17	8.33	780.60	650.02	8.33
<p>TS Discoms have gone through the detailed computations done by the objector in their Annexures.</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 2023-24, 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 FY2023-24, 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.</p>									

	<i>Power Tech)</i>									
	NCES	11,959.28	5,187.70	4.34	8,006.78	3,574.00	4.46	3,952.50	1,613.70	4.08
	Singareni I & II	1,098.04	759.82	6.92	-	-	-	1,098.04	759.82	6.92
	Thermal Power Tech	2,630.44	1,820.21	6.92	2,630.44	1,820.21	6.92	-	-	-
	CSPGCL	2,009.88	783.85	3.90	-	-	-	2,009.88	783.85	3.90
	Thermal Power Tech Unit II	4,814.85	1,877.79	3.90	4,814.85	1,877.79	3.90	-	-	-
	Other Short Term Sources	135.56	61.46	4.53	95.64	43.36	4.53	39.92	18.10	4.53
	D-D purchase/sale	-	-	3.02	814.52	250.96	3.08	-814.52	250.96	3.08
	Interest on Pension Bonds	-	1,378.97	-	-	972.86	-	-	406.11	-

	Total PP Cost	82,84 3.75	38,96 5.20	4.70	58,75 0.98	27,65 4.99	4.71	24,09 2.77	11,31 0.21	4.69
	Sale of Surplus Power	-	-	-	-	-	-			
	Net PP Cost	82,84 3.75	38,96 5.20	4.70	58,75 0.98	27,65 4.99	4.71	24,09 2.77	11,31 0.21	4.69
	Power Purchase Cost as per Objector's Assessment									
		State			TSSPDCL			TSNPDCL		
		2023-24			2023-24			2023-24		
	Particulars	PP MU	PP Cost	PP Cost (INR/kWh)	PP MU	PP Cost	PP Cost (INR/kWh)	PP MU	PP Cost	PP Cost (INR/kWh)
			(INR Cr.)			(INR Cr.)			(INR Cr.)	
	<i>TSGENCO Thermal</i>	26,57 4.06	11,829. 61	4.45	18,748.0 0	8,34 5.81	4.45	7826. 06	3,48 3.81	4.45
	<i>TSGENCO Hydel</i>	5,414. 41	1,317.5 1	2.43	3,819.87	929.5 0	2.43	1,59 4.54	388.0 1	2.43
	<i>CGS stations</i>	19,74 8.98	9,134.2 0	4.63	14,792.8 3	6,28 8.66	4.25	4,95 6.15	2,84 5.55	5.74
	<i>APGPCL</i>	-	-	-	-	-	-	-	-	-
	<i>IPPs (Thermal)</i>	2,496. 65	2,207.1 9	8.84	1,869.99	1,55 7.17	8.33	626.6 7	650.0 2	10.37

	<i>Power Tech)</i>									
	NCES	11,959.28	5,187.70	4.34	8,006.78	3,574.00	4.46	3,952.50	1,613.70	4.08
	Singareni I & II	1,098.04	759.82	6.92	-	-	-	1,098.04	759.82	6.92
	Thermal Power Tech	2,137.86	1,663.13	7.78	2,137.86	1,663.13	7.78	-	-	#DIV/0!
	CSPGCL	2,009.88	783.85	3.90	-	-	-	2,009.88	783.85	3.90
	Thermal Power Tech Unit II	4,814.85	1,877.79	3.90	4,814.85	1,877.79	3.90	-	-	#DIV/0!
	Other Short Term Sources	135.56	61.46	4.53	95.64	43.36	4.53	39.92	18.10	4.53
	D-D purchase/sale	-	106.13	-	814.52	350.49	4.30	-814.52	-244.36	3.00
	Interest on Pension Bonds	-	-	-	-	-	-	-	-	-

	Total PP Cost	76,389.58	34,928.40	4.57	55,100.32	24,629.90	4.47	21,289.25	10,298.49	4.84	
	Sale of Surplus Power	-17,417.60	-8,999.67	-	-10,650.14	-5,502.93	5.17	-6,767.46	-3,496.75	5.17	
	Net PP Cost	58,971.98		4.57	44,450.18	19,126.98	4.30	14,521.79	6,801.75	4.68	
	Particulars		Disallowances in Power Purchase Cost claimed by the Petitioners as per Objector's Assessment (INR Crores)								
				State	TSSPDCL	TSNPDCL					
				<i>TSGENCO Thermal</i>	-1,589.28	-1,121.22		-468.06			
				<i>TSGENCO Hydel</i>	-	-		-			
				<i>CGS stations</i>	-1,017.61	-873.45		-144.16			
				<i>APGPCL</i>	-	-		-			
				<i>IPPs</i>	-	-		-			
				<i>NCEs</i>	-	-		-			
				<i>Singareni I & II</i>	-	-		-			
				<i>Thermal Power Tech</i>	-157.08	-157.08		-			
				<i>CSPGCL</i>	-	-		-			
				<i>Thermal Power Tech Unit II</i>	-	-		-			
				<i>Other Short Term Sources</i>	-	-		-			
				<i>D-D purchase/ sale</i>	106.13	99.53		6.61			
				<i>Interest on Pension Bonds</i>	-1,378.97	-972.86		-406.11			

		Total PP Cost	-4,036.81	-3,025.09	-1,011.72	
		Sale of Surplus Power	-8,999.67	-5,502.93	-3,496.75	
		Net PP Cost	-13,036.48	-8,528.01	-4,508.47	
	V) Hence, it is prayed that the Hon'ble Commission may allow the Power Purchase cost of Rs. 25,928.72 Crores for FY 2023-24 as per Objector's Assessment.					
5	NON-TARIFF INCOME:					
	i) TSSPDCL and TSNPDCL have claimed NTI towards Retail Supply Business to the tune of Rs. 28.18 Crores and Rs. 33.81 Crores for FY 2023-24, 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.					The details of Non-tariff income as per audited accounts and the segregation of accounts between distribution and retail supply business for FY 2021- 22 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 2022- 23and FY 2023-24are clearly mentioned under para no. 5.2 of Chapter – 5 and para no. 6.2 of chapter 6 in the ARR & Tariff Proposals of TSSPDCL and TSNPDCL respectively. 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.
	ii) As per the latest available Audited Accounts of Q1 & Q2 for FY 2022-23 pertaining to TSSPDCL and TSNPDCL, the NTI booked for Retail Business is Rs. 70.20 Crores and Rs. 127.33 Crores respectively which are far more than the projected NTI.					
	iii) Assuming the overall NTI on the basis of the latest Audited Accounts for both Discoms, the Objector has arrived at Rs. 265.29 Crores as NTI for both Discoms for FY 2023-24 for Retail Supply Business.					
	Objector Assessment of Non-Tariff Income for FY 2023-24					
	<i>(All Figures in Rs. Crores)</i>					
		TSSPDCL		TSNPDCL		Total
	Non-Tariff Income	Actuals H1	Objector's Assessment	Actuals H1	Objector's Assessment	Actuals H1 Objector's Assessment

Particulars	2022-23	2023-24	2022-23	2023-24	2022-23	2023-24
As per accounts (A)	70.20	155.94	69.49	137.96	139.69	293.90
Projected by the Petitioner(B)	-	28.18	-	33.81	-	61.99
Balance understated by Petitioner(A-B)	-	-127.76	-	-104.15	-	-231.91
iv) It is respectfully submitted that the Hon'ble Commission may align the NonTariff incomes strictly in line with the audited accounts as per Objector's Assessment and reduce it from the ARR being approved.						
GOVERNMENT OF TELANGANA SUBSIDY:						
i) The Average Cost of Supply (ACoS) as approved in the RST tariff order dt. 23.03.2022 for FY 2022-23 is Rs. 6.80/kWh for TSSPDCL and Rs. 7.57/kWh for TSNPDCL..						
ii) The Average Cost of Supply (ACoS) as computed by the Objector for FY 2023-24 is Rs. 5.61/kWh for TSSPDCL and Rs. 6.44/kWh for TSNPDCL.						
iii) Considering the actual sales to subsidised category of consumers and the average cost to serve, the cost of supplying power to subsidised categories for each discom is worked out. It is observed that there is an additional subsidy requirement of Rs.						
The ACoS calculated by the objector is not correct because they have omitted/ estimated lesser cost for certain items and considered lower sales (mainly by considering lower LIS sales) and the Discoms' responses for the same are already mentioned in above sections.						
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.						

6,018.47 Crores and Rs. 5,367.15 Crores for TSSPDCL and TSNPDCL respectively for FY 2023-24.

iv) The computations for the same are provided in the tables below: **Subsidy requirement for TSSPDCL for FY 2023-24**

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)	10,547.46	5.61	5,912.95	5,775.11	137.84
LT Agriculture	10,590.92	5.61	5,937.32	56.69	5,880.63
Total	21,138.39		11,850.27	5,831.80	6,018.47

Subsidy requirement for TSNPDCL for FY 2023-24

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	$E = C - D$

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

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

	LT (Domestic)	4,234.41	6.44	2,724.85	1,999.52	725.34	
	LT Agriculture	7,290.39	6.44	4,691.39	49.57	4,641.81	
	Total	11,524.79		7,416.24	2,049.09	5,367.15	
	<p>*Note: The ACoS as computed by the Objector has been provided in the forthcoming sections.</p>						
	<p>v) The Objector humbly submits that the Hon'ble Commission may consider the shortfall of subsidy receivable from the State of Telangana for FY 2023-24 and allow the same in the instant proceedings towards the ARR for FY 202324 in line with the Section 65 of the Electricity Act, 2003.</p>						
	<p>8 URGENT NEED FOR CROSS SUBSIDY AND TARIFF RATIONALIZATION:</p> <p>i) The Objector submits 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.</p>						<p>TS Discoms have proposed for retaining the tariffs as per the Tariff Order for FY 2022-23 for the ensuing year FY 2023-24 except few proposals/modifications like</p> <ul style="list-style-type: none"> • revision of tariff for LT VII B Wholly Religious Places and introduction of new category for HT wholly religious places, • Green Tariff for all Tariff categories, • introduction of Grid Support charges / Parallel Operation Charges
	<p>ii) The National Tariff Policy, 2016 stipulates that the cross-subsidy levels are to be kept within the permissible range of $\pm 20\%$ of the Cost of Supply. It is submitted that the Hon'ble Appellate Tribunal for Electricity (Hon'ble APTEL or Hon'ble Tribunal) has taken cognizance of this and given the following as part of its Findings and Analysis in its Judgement dt. 18.02.2022 in Appeal No. 248 of 2018 (Annexed herewith as Annexure-I):</p> <p><i>"27. We are inclined to record here that State Commission has miserably failed in complying with the directions passed by this Tribunal in various Judgements but</i></p>						<p>TS Discoms have not proposed for any change in tariff rates except above-mentioned cases and would abide by the directions of Hon'ble Commission in this regard.</p>

also failed to implement the provisions of the Tariff Policy, 2016 which clearly mandates that:

“Clause 8.3(2)

- a) **Separate consumer tariff at each voltage level has to be determined in order to fulfil the mandate of Section 61(g) of the Electricity Act 2003, which is to reflect actual cost of supply;**
- b) Separate consumer tariff at each voltage level is required in order to ascertain the actual cross subsidies built in a consumer's tariff;
- c) Without specifying a separate consumer tariff for consumers connected at each voltage level, a progressive reduction in actual cross subsidies is not possible as the said component is not known;
- d) **The retail/ effective tariff or average billing rate at a particular voltage level cannot exceed more than 20% of the actual cost of supply of a distribution licensee at the said voltage level.**

...

29. In the light of the foregoing paragraphs, it is clear that this Tribunal has, time and again, been consistently held that the State Commissions have to necessarily determine voltage wise tariff depending upon different category of consumers, and the principle of which has also been upheld by the Hon'ble Supreme Court in Punjab State Power Corpn. Ltd. v. Punjab State Electricity Regulatory Commission, (2015) 7 SCC 387 as stated above.

(Emphasis supplied)

iii) Despite such clear mandate from the Hon'ble APTEL and the National Tariff Policy, 2016, the Objector submits that the tariff approved in the RST Order for FY 2022-23 dt. 23.03.2022 has increased the Cross-subsidy level % beyond the permissible range of $\pm 20\%$ as per the Tariff Policy, 2016:

Category	FY 2022-23				
	Sales submitted in Petition (MUs)	Revenue submitted in Petition (Rs. Crores)	ABR (Rs./ kWh)	CoS approved in RST Order for FY23 (Annexure-9) (Rs./kWh)	ABR /Co S (%)
LT Category	12,862.79	3,512.49	2.73		-
Category I (A&B) - Domestic	4,006.42	1,901.08	4.75	7.76	61%
Category II (A,B,C & D) - Non-domestic/Commercial	896.35	1,022.03	11.40	7.46	153%
Category III - Industrial	238.40	224.62	9.42	7.46	126%
Category IV (A&B) - Cottage Industries & Dhobighats	8.54	4.17	4.88	9.76	50%
Category V (A&B) - Irrigation and Agriculture	7,290.39	47.11	0.06	8.34	1%

Category VI (A & B) - Local Bodies, St. Lighting & PWS	359.88	255.68	7.10	9.74	73%
Category VII (A & B) - General Purpose	55.01	48.06	8.74	9.74	90%
Category VIII - Temporary Supply	7.68	9.60	12.49	11.65	107%
Category IX Electric Vehicle Charging Stations	0.13	0.14	10.89	-	0%
HT Category at 11 KV	2,328.96	1,792.31	7.70		-
HT-I Industry Segregated	1,023.79	982.63	9.60	9.13	105%
HT-I (B) Ferro-Alloys	-	-	-	-	-
HT-II - Others	170.28	197.53	11.60	9.55	121%
HT-III Airports, Railways and Bustations	7.69	7.79	10.13	8.25	123%
HT-IVA Lift Irrigation & Agriculture	22.69	25.43	11.21	6.27	179%

HT - IV (B) Composite P.W.S Schemes	151.52	92.71	6.12	6.27	98%
HT-VI Townships and Residential Colonies	8.62	7.59	8.81	12.22	72%
HT -VII Temporary Supply	25.34	37.49	14.80	8.55	173%
HT- VIII RESCO (Siricilla)	919.03	441.14	4.80	6.48	74%
HT-IX Electric Vehicle Charging Stations	-	-	-	10.52	-
HT Category at 33 KV	567.72	422.28	7.44		-
HT-I Industry Segregated	149.71	135.02	9.02	5.96	151%
HT-I (B) Ferro- Alloys	20.87	15.47	7.41	4.72	157%
HT-II - Others	6.72	8.55	12.73	6.67	191%
HT-III Airports, Railways and Bustations	-	-	-	-	-
HT-IVA Lift Irrigation &Agriculture	14.82	19.54	13.18	5.12	257%

HT - IV (B) Composite P.W.S Schemes	342.68	209.15	6.10	5.12	119%
HT-VI Townships and Residential Colonies	26.54	23.44	8.83	5.82	152%
HT -VII Temporary Supply	6.37	11.11	17.44	7.11	245%
TSSNPDCCL	FY 2022-23				
Category	Sales submitted in Petition (MUs)	Revenue submitted in Petition (Rs. Crores)	ABR (Rs./ kWh)	CoS approved in RST Order for FY23 (Annexu re-9) (Rs./kW h)	ABR /Co S (%)
HT-IX Electric Vehicle Charging Stations	-	-	-	-	-
HT Category at 132 KV	2,267.81	1,909.58	8.42		-

HT-I Industry Segregated & HMWSSB	675.89	490.05	7.25	5.29	137%
HT-I (B) Ferro-Alloys	-	-	-	-	-
HT-II - Others	5.53	12.42	22.48	10.50	214%
HT-III Airports, Railways and Bustations	-	-	-	-	-
HT-IVA Lift Irrigation & Agriculture	932.08	967.69	10.38	6.44	161%
HT - IV (C) Composite P.W.S Schemes	26.77	16.34	6.10	6.44	95%
HT-V (A) Railway Traction	523.11	338.70	6.47	5.30	122%
HT-V (B) HMR	-	-	-	-	-
HT-VI Townships and Residential Colonies	103.31	82.92	8.03	4.85	165%
HT -VII Temporary Supply	1.12	1.46	12.96	-	0%
HT-IX Electric Vehicle	-	-	-	-	-

Charging Stations					
Total	18,027.28	7,636.66	4.24	7.57	56%

Category	TSSPDCL FY 2022-23				
	Sales submitted in Petition (MUs)	Revenue submitted in Petition (Rs. Crores)	ABR (Rs. /k Wh)	CoS approved in RST Order for FY23 (Annexure-8) (Rs./kWh)	ABR/CoS (%)
LT Category	25,658.95	10,418.55	4.06		-
Category I (A&B) - Domestic	9,977.86	5,468.40	5.48	6.82	80%
Category II (A,B,C & D) - Non-domestic/Commercial	3,050.42	3,477.00	11.40	6.53	175%
Category III - Industrial	933.39	857.92	9.19	6.59	139%

Category IV (A&B) - Cottage Industries & Dhobighats	9.50	4.49	4.73	6.43	74%
Category V (A&B) - Irrigation and Agriculture	11,032.21	54.98	0.05	8.38	1%
Category VI (A & B) - Local Bodies, St. Lighting & PWS	470.19	360.10	7.66	6.40	120%
Category VII (A & B) - General Purpose	89.37	76.84	8.60	7.43	116%
Category VIII - Temporary Supply	95.70	118.54	12.39	9.31	133%
Category IX Electric Vehicle Charging Stations	0.30	0.27	8.95	6.16	145%
HT Category at 11 KV	6,570.40	6,643.99	10.11		-
HT-I Industry Segregated	4,189.20	4,003.72	9.56	7.64	125%
HT-I (B) Ferro-Alloys	0.41	0.35	8.58	-	0%
HT-II - Others	1,868.19	2,134.95	11.43	7.36	155%

TSSPDCL	FY 2022-23				
Category	Sales submitted in Petition (MUs)	Revenue submitted in Petition (Rs. Crores)	ABR (Rs. /kWh)	CoS approved in RST Order for FY23 (Annexure-8) (Rs./kWh)	ABR/CoS (%)
HT-III Airports, Railways and Bustations	4.66	4.83	10.38	7.19	144%
HT-IVA Lift Irrigation & Agriculture	40.28	33.61	8.34	6.38	131%
HT - IV (B) Composite P.W.S Schemes	142.17	87.08	6.12	6.38	96%
HT-VI Townships and Residential Colonies	174.38	153.60	8.81	8.13	108%
HT -VII Temporary Supply	146.10	222.66	15.24	8.55	178%
HT- VIII RESCO (Siricilla)	-	-	-	-	-

HT-IX Electric Vehicle Charging Stations	5.02	3.19	6.36	9.50	67%
HT Category at 33 KV	7,499.69	6,618.43	8.82		-
HT-I Industry Segregated	5,960.88	5,199.72	8.72	5.76	151%
HT-I (B) Ferro-Alloys	54.86	43.58	7.94	4.57	174%
HT-II - Others	1,042.40	1,038.55	9.96	5.92	168%
HT-III Airports, Railways and Bustations	-	-	-	-	-
HT-IVA Lift Irrigation & Agriculture	15.18	16.83	11.09	5.53	201%
HT - IV (B) Composite P.W.S Schemes	263.89	161.03	6.10	5.53	110%
HT-VI Townships and Residential Colonies	121.46	103.36	8.51	5.78	147%
HT -VII Temporary Supply	41.03	55.36	13.49	5.84	231%
HT-IX Electric Vehicle	-	-	-	-	-

Charging Stations						
HT Category at 132 KV	7,245.29	5,308.14	7.33			-
HT-I Industry Segregated & HMWSSB	4,205.45	3,086.48	7.34	5.01		146%
HT-I (B) Ferro-Alloys	229.55	183.70	8.00	4.34		184%
HT-II - Others	45.91	44.94	9.79	5.25		186%
HT-III Airports, Railways and Bustations	54.20	47.24	8.72	4.11		212%
HT-IVA Lift Irrigation & Agriculture	1,821.45	1,399.91	7.69	5.76		133%
HT - IV (C) Composite P.W.S Schemes	268.84	164.00	6.10	5.76		106%
HT-V (A) Railway Traction	527.97	317.91	6.02	5.07		119%
HT-V (B) HMR	91.93	63.96	6.96	4.73		147%
HT-VI Townships and Residential Colonies	-	-	-	-		-

	HT -VII Temporary Supply	-	-	-	-	-	
	HT-IX Electric Vehicle Charging Stations	-	-	-	-	-	
	Total	46,974.33	28,989.11	6.17	6.80	91%	
<p><i>(The orange-highlighted cells indicate the instances where the Average Billing Rate (as submitted in the instant petitions) due to tariff approved in RST Order dt. 23.03.2022, is less than the permissible 80% of the Cost of Supply approved for that category in RST Order dt. 23.03.2022. The pinkhighlighted cells indicate the instances where the Average Billing Rate (as submitted in the instant petitions) due to tariff approved in RST Order dt. 23.03.2022, is greater than the permissible 120% of the Cost of Supply approved for that category in RST Order dt. 23.03.2022.</i></p>							
<p>iv) The Petitioner has proposed to continue with the same tariff as was approved in the RST Order dt. 23.03.2022, with minor modifications for certain categories.</p>							
<p>v) The Objector has already demonstrated that such tariff determined is not in accordance to the Hon'ble APTEL's Judgement dt. 18.02.2022 in Appeal No. 248 of 2018, the National Tariff Policy, 2016, and in turn, the Electricity Act, 2003.</p>							
<p>vi) Therefore, the Objector prays that the Hon'ble TSERC may rationalize, revise, and approve the tariff schedule such that the tariff determined for each category does not exceed more than 20% of the actual cost of supply of a distribution licensee at the said voltage level, in strict accordance to the Hon'ble APTEL's Judgement dt.</p>							

18.02.2022 in Appeal No. 248 of 2018, the National Tariff Policy, 2016, and in turn, the Electricity Act, 2003.

SUMMARY OF OBJECTOR'S ASSESSMENT OF ALLOWABLE ARR FOR FY 2023-24

i) The ARR as per Objector's assessment vs Petitioner's submission are provided below:

Summary of ARR for TSSPDCL for FY 2023-24

(All figures in Rs. Crores)

Particulars	Petitioner's Claim	Objector's Assessment	Disallowance
Transmission Cost	2,670.27	2,670.27	-
SLDC Cost	32.81	32.81	-
Distribution Cost	5,168.36	5,168.36	-
PGCIL & ULDC Expenses	1,081.98	1,081.98	-
Network and SLDC Cost (A)	8,953.42	8,953.42	-
Power Purchase / Procurement Cost	27,654.99	19,126.98	8,528.01
Interest on Consumer Security Deposits	311.96	311.96	-
Supply Margin in Retail Supply Business	42.83	42.83	-
Other Costs if any	-	-	-

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 submitted by Discoms, considering the justifications shared on the same.

Supply Cost (B)	28,009.78	19,481.76	8,528.01
Aggregate Revenue Requirement (A+B)	36,963.20	28,435.18	8,528.01
Non-Tariff Income	28.18	155.94	-127.76
Net Revenue Requirement	36,935.02	28,164.27	8,770.74
Sales (MU)	52,352.87	50,444.21	1,908.66
ACoS (Rs./kWh)	7.06	5.61	1.45
Total Revenue	33,724.37	32,394.69	
Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)	33,521.34	32,191.65	1,329.69
Revenue from Cross Subsidy Surcharge	100.80	100.80	-
Revenue from Additional Surcharge	102.23	102.23	-
Revenue Deficit(-)/Surplus(+) at Current Tariffs	-3,210.64	4,115.44	-7,326.09
Government Subsidy u/s 65 of the Electricity Act, 2003		6,018.47	-6,018.47
Net gap – Deficit(-)/Surplus(+)	-3,210.64	10,133.91	-13,344.56

Summary of ARR for TSNPDCL for FY 2023-24

(All figures in Rs. Crores)

Particulars	Petitioner's Claim	Objector's Assessment	Disallowance
Transmission Cost	1,126.29	1,126.29	-
SLDC Cost	13.69	13.69	-

Distribution Cost	4,081.42	4,081.42	-
PGCIL & ULDC Expenses	451.19	451.19	-
Network and SLDC Cost (A)	5,672.60	5,672.60	-
Power Purchase / Procurement Cost	11,310.21	6,801.75	4,508.47
Interest on Consumer Security Deposits	81.08	81.08	-
Supply Margin in Retail Supply Business	31.27	31.27	-
Other Costs if any	-	-	-
Supply Cost (B)	11,422.56	6,914.10	4,508.47
Aggregate Revenue Requirement (A+B)	17,095.16	12,586.69	4,508.47
Non-Tariff Income	33.81	137.96	-104.15
Net Revenue Requirement	17,061.35	12,448.74	4,612.61
Sales (MU)	21,265.36	19,345.26	1,920.10
ACoS (Rs./kWh)	8.02	6.44	1.59
Total Revenue	9,737.70	8,331.27	
Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)	9,737.70	8,331.27	1,406.43
Revenue from Cross Subsidy Surcharge	-	-	-
Revenue from Additional Surcharge	-	-	-

Revenue Deficit(-)/Surplus(+) at Current Tariffs	-7,323.65	-4,117.47	-3,206.18
Government Subsidy u/s 65 of the Electricity Act, 2003	-	5,367.15	-5,367.15
Net gap – Deficit(-)/Surplus(+)	-7,323.65	1,249.68	-8,573.33

Summary of ARR for Telangana State for FY 2023-24

(All figures in Rs. Crores)

Particulars	Petitioner's Claim	Objector's Assessment	Disallowance
Transmission Cost	3,796.56	3,796.56	-
SLDC Cost	46.50	46.50	-
Distribution Cost	9,249.78	9,249.78	-
PGCIL & ULDC Expenses	1,533.17	1,533.17	-
Network and SLDC Cost (A)	14,626.02	14,626.02	-
Power Purchase / Procurement Cost	38,965.20	25,928.72	13,036.48
Interest on Consumer Security Deposits	393.04	393.04	-
Supply Margin in Retail Supply Business	74.10	74.10	-
Other Costs if any	-	-	-
Supply Cost (B)	39,432.34	26,395.86	13,036.48
Aggregate Revenue Requirement (A+B)	54,058.35	41,021.88	13,036.48
Non-Tariff Income	61.99	293.90	-231.91

	Net Revenue Requirement	53,996.36	40,727.98	13,268.39	
	Sales (MU)	73,618.23	69,789.47	-	
	ACoS (Rs./kWh)	7.33	5.82	1.52	
	Total Revenue	43,462.07	40,725.95	-	
	Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)	43,259.04	40,522.92	2,736.12	
	Revenue from Cross Subsidy Surcharge	100.80	100.80	-	
	Revenue from Additional Surcharge	102.23	102.23	-	
	Revenue Deficit(-)/Surplus(+) at Current Tariffs	-10,534.29	-2.03	-10,532.27	
	Government Subsidy u/s 65 of the Electricity Act, 2003	-	11,385.62	-11,385.62	
	Net gap – Deficit(-)/Surplus(+)	-10,534.29	11,383.59	-21,917.88	
	ii) 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.				
	iii) It is prayed that the Hon'ble Commission may allow tariff reduction accordingly.				
	PROPOSED CROSS SUBSIDY SURCHARGE				
	i) The Objector prays that the Hon'ble Commission may rationalize the tariffs for industrial consumers and consequently, the cross subsidy surcharge in adherence to the mandate of the National Tariff Policy, 2016. The relevant extract of the National Tariff Policy, 2016 is reproduced below: <i>"8.3 Tariff design: Linkage of tariffs to cost of service</i>				Under the purview of Hon'ble TSERC. TS Discoms would abide by the directions of Hon'ble TSERC in this regards.

...

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

...

Surcharge formula:

...

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

(Emphasis supplied)

ii) Further, it is prayed that the Hon'ble Commission may not exceed the upper limit of allowable Cross-Subsidy Surcharge to Rs. 1.35/kWh and Rs. 1.54/kWh for TSSPDCL and TSNPDCL respectively for FY 2023-24 as computed by the Objector:

(All figures in Rs./kWh)

Discoms	ACoS as per Objector's Assessment	Maximum Tariff	Maximum CSS
	A	B = 1.2 x A	C= 0.2 x B
TSSPDCL	5.61	6.73	1.35
TSNPDCL	6.44	7.72	1.54

PARALLEL OPERATION CHARGES/ GRID SUPPORT CHARGES:

i) The Petitioners in their instant Petitions have again sought the introduction of Parallel Operation Charges/Grid Support Charges (GSC). The relevant extract of the Petition is reproduced below:

The detailed analysis and reasons for levy of Grid Support Charges by TS Discoms is already submitted to the Grid Co-Ordination Committee (GCC) and TS Discoms have

<p><i>“The licensee proposes 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: ...”</i></p>	<p>presented their views and analysis to all the stakeholders during the past GCC meetings with the stakeholders.</p> <p>TS Discoms mentioned that it is inevitable to levy the Grid Support Charges for the benefits availed by the generators during parallel operation with the grid and the gain to the Captive Power Plant is quite substantial in case there is grid support.</p>
<p>ii) It is submitted that the Petitioners had claimed Parallel Operation Charges/Grid Support Charges (GSC) in the previous year’s petitions as well. However, the Hon’ble Commission in its RST Order dt. 23.03.2022 had not allowed the same and had made the following directive:</p> <p><i>“Commission’s view 6.25.5 The stakeholders have vehemently opposed the DISCOMs proposal of GSC. The stakeholders have also raised certain issues purported to be incorrectness in the rationale provided by the DISCOMs. The stakeholders have also requested the Commission to undertake third party analysis before deciding on the levy of GSC as well as the quantum of such GSC. The Commission finds merit in the stakeholders’ suggestion to undertake a detailed study. 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.”</i></p> <p style="text-align: right;">(Emphasis supplied)</p>	<p>After due consultations with the stakeholders and study of methodologies in other states, TS Discoms modified the methodology for levy of Grid Support Charges and proposed the modified Grid Support Charges/ Parallel Operation Charges in the ARR & FPT petition for FY 2023-24.</p> <p>Hence, TS Discoms request Hon’ble Commission to consider the same and approve the levy of Grid Support Charges.</p>

	<p>iii) It is submitted that the Petitioners claim for Parallel Operation Charges/Grid Support Charges (GSC) in the instant petitions have not provided detailed study made by the Grid Coordination Committee. In the absence of the same, it is prayed that the Hon'ble Commission may disallow the claim of the Petitioners towards Parallel Operation Charges/Grid Support Charges (GSC).</p>	
	<p>PRAYERS: The Objector most respectfully prays that this Hon'ble Commission may be pleased to:</p> <ul style="list-style-type: none"> 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 purchase has been projected at exorbitantly high price not relatable to the incumbent market situations; C. Align the Non-Tariff incomes strictly in line with the Audited Accounts and reduce it from the ARR being approved; D. Adjust the subsidy shortfall from the Govt. of Telangana as per Objector's Assessment for FY2023-24; E. 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 2023-24; F. Approve the ARR by considering the total subsidy as prayed and assessed by the Objector in the detailed Objections Statement; 	<p>TS Discoms have responded to the item-wise objections/suggestions proposed by the objector, in the abovementioned sections, and would request the Hon'ble Commission to consider the projections shared by Discoms, considering the justifications shared on the same</p>

	<ul style="list-style-type: none">G. 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;H. Disallow the proposed revenue from proposed tariffs as claimed by the Petitioner;I. Allow Cross Subsidy Surcharge as per the mandates of the National Tariff Policy 2016;J. Disallow the claim of the Petitioners' towards Parallel Operation Charges/Grid Support Charges (GSC);K. Pass necessary orders as may be deemed appropriate in the facts and circumstances of the case in the interest of justice;L. 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.	
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Replies to the Objections/Suggestions raised on ARR & FPT including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 and Power Purchase true-up from FY 2016-17 to FY 2022-23 (Prov) for Retail Supply Business by Sri Anil Agarwal, President of FTCCI Federation House, Federation Marg, # 11-6-841, Red Hills, Hyderabad-500004.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	Formula-linked workable excel model for True-up Petitions filed by TSNPDCL and TSSPDCL for FY 2016-07 to FY 2022-23;	TS Discoms, along with the Petitions and as part of reply to the additional information requirement sought by the Hon'ble Commission have submitted the information requirement which shall help the objector and the same are available in respective websites.
2	Complete details about treatment of amount pertaining to Power Purchase True Up for FY 2016-17 to FY 2022-23;	In the respective true up Petitions, TS Discoms have proposed for the treatment of amount pertaining to Power Purchase True Up for FY 2016-17 to FY 2022-23 in the ARR of subsequent year tariff orders. TS Discoms shall abide by the directions of the Hon'ble Commission in this regard.
3	Details about the treatment of surplus power estimated for FY 2023-24 i.e. 13441 MUs in order to reduce the overall power purchase cost burden on consumers;	TS Discoms have not estimated any sale of surplus power in FY 2023-24 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. 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.
4	Complete set of Audited Reports/Accounts for TSNPDCL and TSSPDCL from FY 2016-17 to FY 2022-23	TS Discoms submit that the Annual Audited Reports for FY 2016-17 to FY 2021-22 have been submitted to the Hon'ble Commission and the same are also available on the respective Discom's websites. Further, quarterly accounts for FY 2022-23 are also available on the respective Discom's websites.

5	Reconciliation Statements for each year from FY 2016-17 to FY 2022-23 of the True-up Amounts as claimed by TSNPDCL and TSSPDCL with the Audited Reports/Accounts for TSNPDCL and TSSPDCL from FY 2016-17 to FY 2022-23; This should also include the break-up between Retail Supply Business and Distribution Business for each cost and revenue element;	As submitted above, it is to be noted that the Annual Audited Reports for FY 2016-17 to FY 2021-22 along with quarterly reports for FY 2022-23 are available in respective Discom's websites and the same shall help the objector.
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2023-24 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల మరియు ట్రా-అప్ ప్రతిపాదనలు పై సిహెచ్. నవీన్ కుమార్, Q న్యూస్ ఆఫీస్, H .No. 1-89 /4, రాఘవేంద్ర నగర్ కాలనీ, భాగ్యనగర్ కాలనీ, బోడుప్పల్, హైదరాబాద్, తెలంగాణ-500092 గారి సూచనలు/సలహాలకు సమాదానాలు

క్రమ సంఖ్య	అభ్యంతరాలు /సూచనలు	TSNPDCL – సమాదానాలు
1	<p>గత సంవత్సరం 6000 కోట్ల రూపాయల కరెంటు చార్జీలను పెంచారు. ఈ సంవత్సరం . మరో 16000 కోట్ల రూపాయల భారం ప్రజలపై వేయాలని విద్యుత్ సంస్థలు ప్రతిపాదనలు పెట్టాయి రైతులకు ఉచిత విద్యుత్తును ఇవ్వడం వల్ల పడిన అదనపు భారం ఇది అని డిస్కంలు చెబుతున్నాయి. రైతులకు ఉచిత విద్యుత్తు అనేది రాష్ట్ర ప్రభుత్వ పథకం. ఆ అదనపు భారాన్ని రాష్ట్ర ప్రభుత్వమే భరించాలి. సామాన్య ప్రజలపై భారం వేయడం సరిగాదు.</p>	<p>గత సంవత్సరం రూ॥ 6000 కోట్లు రూపాయల కరెంటు చార్జీలను పెంచిన మాట వాస్తవమే కానీ, ఈ సంవత్సరం మరో రూ॥ 16,000 కోట్ల రూపాయల భారం ప్రజలపై వేయాలని విద్యుత్ సంస్థలు ప్రతిపాదనలు పెట్టాయి అనేది వాస్తవం కాదు. ఈ సంవత్సరం డిస్కాములు రూ॥ 10,535 కోట్ల లోటు సమగ్ర ఆదాయ ఆవశ్యకతలను మరియు ధరలు పెంచకుండా ప్రతిపాదనలు గౌరవ కమీషన్ కు సమర్పించడం జరిగినది. మరియు ఈ 10535 కోట్ల లోటులో ప్రభుత్వం ఇచ్చే సబ్సిడీ కలసి లేదు. ఈ విషయాలపై గౌరవ కమీషన్ వారు అంతిమంగా నిర్ణయం తీసుకుంటారు.</p>

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2	<p>Additional Consumption Deposit Due (ACD- Due) పేరుతో పేద ప్రజలపై వేలకోట్ల రూపాయల భారం అదనంగా వేస్తున్నారు ఈ భారాన్ని పేదప్రజలు తట్టుకోలేక పోతున్నారు. వాళ్ళు వినియోగిస్తున్న విద్యుత్తుకు ఎలాగూ ఛార్జీలు కడుతున్నారు. అదనంగా ACDdues పేరుతో ఛార్జీలు వసూలు చేయడం సరికాదు. ACDdues వసూళ్ళను తక్షణం నిలిపి వేయాలి.</p>	<p>గౌరవనీయమైన విద్యుత్ నియంత్రణ మండలి TSERC రెగ్యులేషన్ నెం.6(2004) ప్రకారం అదనపు సెక్యూరిటీ డిపాజిట్ (ACD) వినియోగదారుడు వాడుకున్న అదనపు లోడును బట్టి (ACD) నిర్ణయించడం జరగదు. వినియోగదారుడు గత సంవత్సరము వినియోగించిన రెండు నెలల సగటు విద్యుత్ వినియోగ యూనిట్లకు సమానంగా సెక్యూరిటీ డిపాజిట్ను విద్యుత్ సంస్థ వద్ద నిల్వ ఉంచాలి. ప్రస్తుత బిల్లింగ్ విధానము ప్రకారంగా వినియోగదారుడు వినియోగించిన నెల తరువాత బిల్లు జారీ చేయడము అవుతున్నది మరియు బిల్లు జారీ చేసిన తరువాత 30 రోజుల లోపు బిల్లు చెల్లించడానికి వెసలు బాటు కలదు అనగా మొత్తం రెండు నెలల తర్వాత మాత్రమే వినియోగదారుడు తాను వినియోగించుకున్న విద్యుత్ కు ఛార్జీలను డిస్కం కు చెలిస్తున్నాడు కావున ఒక సంవత్సరంలో విద్యుత్ వినియోగదారుడు వారి సర్వీస్ పై వాస్తవంగా ఉండవలసిన సెక్యూరిటీ డిపాజిట్ ను 2 నెలల సగటు వినియోగ యూనిట్ల ఆధారంగా లెక్కించి నుంచి అంతకు ముందే వారి నూతన సర్వీస్ తీసుకున్నప్పుడు చెల్లించిన డిపాజిట్ ను మరియు అదనపు లోడ్</p>

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		పెంచినప్పుడు తీసుకున్న సెక్యూరిటీ డిపాజిట్ ను మినహించగా వచ్చిన నికరమొత్తాన్ని అదనపు సెక్యూరిటీ డిపాజిట్ గా (ACD) లెక్కిస్తారు
3	వందల ఎకరాల భూమి ఉన్న భూస్వాములకు, బడా రాజకీయనాయకులకు ఉచిత విద్యుత్తును ఎందుకివ్వాలి. వాళ్ళ ఫామ్ హౌసులకు ఉచిత విద్యుత్తును ఇవ్వడం వల్ల వందల కోట్ల రూపాయల భారం ప్రజలపై పడుతుంది. వాళ్ళందరికీ మీటర్లు పెట్టి ఛార్జీలు వసూలు చేయాలి.	రైతులకు ఉచిత విద్యుత్తు మరియు సర్వీసులకు మీటర్లు పెట్టడం అనేది రాష్ట్ర ప్రభుత్వ యొక్క నిర్ణయం ప్రకారం చేయడం జరుగుతుంది. ఇది లైసెన్స్ పరిధిలో లేని అంశం.
4	కూరగాయలు, పండ్లు, పూలు (Horticulture పంటలు) పండించుకుంటున్న చిన్న చిన్న రైతులకు ఉచిత విద్యుత్తును ఇవ్వడం లేదు. వాళ్ళ కరెంటు కనెక్షన్ కట్ చేసి లక్షల రూపాయల పెనాల్టీలు వేస్తున్నారు. పోలీసు కేసులు పెడుతున్నారు. కానీ అదే బడా రాజకీయనాయకులు ఫామ్ హౌజులలో ఇవే పంటలు పండించుకుంటే ఎవ్వడూ పట్టించుకోవడం లేదు. మన ఎమ్మెల్యేలు,	2022-23 ఆర్థిక సంవత్సరంలో, హార్డికల్చర్, విబాగం-5() సర్వీసుల పై ఎటువంటి కేసులు నమోదు చేయబడలేదు. డిపార్ట్మెంటల్ విధానం ప్రకారం ఫామ్ హౌజులకు విద్యుత్ సరఫరా సింగిల్ DTR నుండి సర్వీస్ కనెక్షన్ ఇవ్వటం జరుగుతున్నది.

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	<p>ఎంపీలు, మంత్రులకు ఉన్న ఫామ్ హాజులను ఎప్పుడన్నా విద్యుత్ సిబ్బంది తనిఖీ చేశారా? అలాంటి వివరాలుంటే ఇవ్వండి. ఎంతమంది రాజకీయనాయకుల మీద కేసులు పెట్టారు? పెనాల్టీలు చేశారు? వివరాలు ఇవ్వండి</p>	
5	<p>విద్యుత్ సంస్థలు తెలంగాణ వచ్చిన తరువాత నష్టాలలో కూరుకు పోయాయని చెబుతున్నారు. అప్పులు తెచ్చి ఉద్యోగుల జీతాలు చెల్లించే పరిస్థితి ఎందుకు వచ్చింది? ప్రస్తుతం విద్యుత్ సంస్థలకు ఉన్న నష్టాలెన్ని? ఈ వివరాలు దయచేసి ఇవ్వండి. ఈ నష్టాలకు కారణాలు తెలుపగలరు.</p>	<p>ధర మరియు బొగ్గు ధరలు ఎక్కువగా పెరుగుట వలన విద్యుత్ ఉత్పత్తి వ్యయం గణనీయంగా పెరిగింది. కావున ఒక్క యూనిట్ విద్యుత్ కొనుగోలు వ్యయం కూడా గణనీయంగా పెరిగింది. వలన విద్యుత్ కొనుగోలుకు అయ్యే వ్యయానికి కన్న విద్యుత్ అమ్మకం వల్ల వచ్చే రాబడి తక్కువగా ఉండటం వల్ల విద్యుత్ సంస్థలకు నష్టం వాటిల్లు చున్నది ఈ నష్టాలు 2022-23 ఆర్థిక సంవత్సరం అంతానికి ఆడిట్ చేయబడిన బ్యాలెన్స్ షీట్ ప్రకారము రూ" 15633.74 కోట్లు.</p>
6	<p>మొన్నటి వరకూ రైతుల మోటార్లకు మీటర్లు పెట్టేది లేదని మన ముఖ్యమంత్రి చెప్పాడు. ఇప్పుడు రైతుల ట్రాన్స్ ఫార్మర్లకు మీటర్లు పెడుతామని చెబుతున్నారు. కేవలం చిన్న రైతుల ట్రాన్స్ ఫార్మర్ల ? బడా రాజకీయనాయకుల ఫామ్ హాజులకు కూడా మీటర్లు పెట్టాలని మీరు ఆడేశాలిచ్చారా? వాళ్లకేమన్నా మినహాయింపు ఉందా? దయ చేసి మొదట మన రాజకీయ నాయకుల ఫామ్ హాజులకు మీటర్లు పెట్టండి.</p>	<p>2,32,526 వ్యవసాయ ట్రాన్స్ ఫార్మర్ల కు మీటర్లు బిగించుటకు సుమారుగా Rs 378.55 కోట్లు మరియు ప్రతి సంవత్సరమునకు నిర్వహణకొరకు Rs 136.16 కోట్లు అంచనా వేయబడినది. అందువలన ఇట్టి విషయము ప్రస్తుతం పరిశీలనలో ఉన్నది. డిపార్ట్మెంటల్ విధానం ప్రకారం ఫామ్ హాజులకు విద్యుత్ సరఫరా సింగిల్ DTR నుండి సర్వీస్ కనెక్షన్ ఇవ్వటం జరుగుతున్నది.</p>

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7	<p>రైతులకు 24 గంటల ఉచిత విద్యుత్తు ఇస్తున్నామని ప్రభుత్వం చెబుతున్నది. నేను రాష్ట్రం మొత్తం తిరుగుతున్నాను. ఎక్కడా 24 గంటల ఉచిత విద్యుత్తు లేదు. ఇలాంటి తప్పుడు ప్రకటనలు విద్యుత్ సంస్థలు, రాజకీయ నాయకులు ఎందుకు చేస్తున్నారు? 24 గంటల కరెంటు ఇస్తున్నామని అదే రైతుల ఇంట్లకు కరెంటుబిల్లు లలో అనవసర భారాలు ఎస్తున్నారు. మోటారు వద్ద ప్రీ కరెంటు, ఇంట్లో కరెంటు మోత అట్లా తయారయ్యింది రైతుల పరిస్థితి దయ చేసి రైతులకు ప్రస్తుతం ఎన్ని గంటలు కరెంటు ఇస్తున్నారో వివరాలు చెప్పండి. రైతులకు ఉచిత కరెంటు పేరు మీద తెలంగాణ వచ్చిన తరువాత ఎంత ఖర్చు పెట్టారు? ఒక్కో రైతు కనెక్షన్ పై పడిన సగటు భారం ఇప్పటి వరకూ ఎంత? అనే వివరాలు ఇవ్వండి.</p>	<p>వ్యవసాయానికి 24 గంటలు సరఫరా చేయకపోవడానికి అనేక కారణాలున్నాయి ఇట్టి విషయాన్ని మా గౌరవనీయ CMD / TS TRANSCO గారు పత్రిక ప్రకటన ద్వారా స్పష్టంగా వివరించారు మరియు పత్రిక ప్రకటనను జతపర్చడమైనది.</p>
8	<p>చివరగా రెగ్యులేటరీ కమిషన్ ను ఈ క్రింది విషయాలను కోరుకుంటున్నాను.</p> <ol style="list-style-type: none"> i. ఇప్పటికే సామాన్య ప్రజలు ధార్జీల భారం మోయలేకపోతున్నారు. కొత్తగా ధార్జీలను ii. Ali Additional Consumption Deposit Due (ACD- Due) పేరుతో పేద ప్రజలపై వేస్తున్న భారాలను తక్షణం ఆపాలని విద్యుత్ సంస్థలను ఆదేశించండి. iii. ఉచిత విద్యుత్తు పేరుతో బడా రాజకీయ నాయకుల ఫామ్ హౌజులకు ఇస్తున్న ప్రీ కరెంటును తక్షణం నిలిపివేయండి. అన్నీ ఫామ్ హౌజులకు మీటర్లు పెట్టి ధార్జీలు వసూలు చేయండి. 	-

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	<p>iv. ఇప్పటి వరకూ ఎమ్మెల్యేలు, ఎంపీలు, మంత్రులకు చెందిన ఎన్ని ఫామ్ హాజుల ను విద్యుత్ సిబ్బంది తనిఖీ చేశారు. ఈ ఫామ్ హాజులలో అక్రమంగా Horticulture పంటలు పండించుకుంటున్న వారిపై వేసిన పెనాల్టీలు, ఆ పెద్దల వివరాలు ఇవ్వండి.</p> <p>v. విద్యుత్ సంస్థల నష్టాల వివరాలు ఇవ్వండి.</p> <p>vi. ప్రస్తుతం రైతులకు ఎన్ని గంటలు కరెంటు ఇస్తున్నారో జిల్లా ల వారి వివరాలు ఇవ్వండి</p>	
9	<p>చివరగా, తెలంగాణ రెగ్యులేటరీ కమిషన్ ముందు వాదనలను ప్రత్యక్షంగా వినిపించడానికి అవకాశం కల్పించండి.</p>	-

Replies to the Objections/Suggestions raised on ARR & FPT including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 and Power Purchase true-up from FY 2016-17 to FY 2022-23 (Prov) for Retail Supply Business by Sri S. Surya Prakash Rao, Former Director (Commercial), erstwhile APCPDCL and Former Secretary erstwhile APERC, Flat.no.105, Ashok Chandra Enclave, 11-4-660, Redhills, Hyderabad-500004

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	Discoms have not proposed any increase in Tariffs except minor changes like segregating 'Wholly Religious Places' category and introducing parallel operation charges for captive generating units, etc which are not controversial in general. Thus the consumers are spared from any rate shock, while the Revenue gap with existing tariffs is indicated as Rs.3211 Crs for SPDCL and Rs.7324 Crs for NPDCL. It's expected that the State Government will grant required subsidy in exercise of its powers u/s 65 of the Act to bridge the Revenue gap and to ensure full recovery of ARR as may approved by the Hon'ble Commission	For the FY 2022-23, TSERC approved INR 7912.88 Crs towards Subsidy from GoTS to TS Discoms (INR 1610.89 Crs to TSSPDCL and INR 6301.99 Crs to TSNPDCL) to bridge the revenue deficit of the Discoms. For FY 2023-24, TS Discoms have claimed a revenue gap of INR 10,535 Crs and are expecting to meet the revenue deficit through the financial support of Government of Telangana State through subsidy.
3	I take this opportunity of public consultation process on ARR/Tariff filings to provide my observations as follows on the recently issued Reg.no.1 of 2023 on Fuel Cost Adjustment (FCA) charge which forms part of Tariff and is relevant to the Retail Tariff proceedings of 2023-24.	TS Discoms submit that Regulation No. 1 of 2023 are finalized after the completion of stakeholder consultation by the Hon'ble Commission. However, TS Discoms are replying to the objections raised here considering that FCA forms part of tariff..
3.i	While Sec.62(4) of the Act empowers the Commissions to specify the formula for Fuel Surcharge, it is not clear whether they can permit automatic recovery without prior check and without following the procedure specified u/s 64	In 2021, Ministry of Power, Government of India notified Electricity (Timely Recovery of Costs due to Change in Law) Rules, 2021 , which allowed Discoms to claim any variation in costs within 30 days and provided a formula for adjustment. Also, through a letter dated 9th Nov 2021 (No. 23/23/2021-R&R), The Ministry of Power (MoP) instructed State Commissions to place a mechanism in operation with immediate effect that allows auto pass through of fuel and power purchase cost to ensure that there is timely recovery of cost due to variation in

		<p>fuel costs.</p> <p>The State Commission is bound by laws to implement rules and guidelines laid down by the MoP.</p>
3.ii	<p>Though the components of the FCA formula are arithmetical in nature, the parameters for arriving at the numbers need scrutiny, i.e, coal quality w.r.t coal supply agreements, PPAs terms, load forecasts, long-term and short-term power procurement plans, demand side management, etc are involved in arriving at the value of the components. Hence it's imperative that there should be a check by the Hon'ble Commission before passing on the FCA burden to the consumers either monthly or quarterly</p>	<p>TS Discoms submit that the FCA mechanism aims to recover/refund the variation in the actual fuel costs from the approved fuel costs and the parameters used in FCA formulae are defined to avoid pass through of any higher costs. Further, the FCA claims are subject to quarterly check and annual true up of TS Discoms. It is further to be noted that the Generation companies are also subject to true up in which the parameters left out in Discoms true up are taken care of..</p>
3.iii	<p>The Regulation no.1 of 2023 specifies automatic monthly pass through, subject to quarterly check and again annual true up. Some concerns on this Regulation are brought to kind notice of the Hon'ble Commission here under:</p> <p>(a) Sub-clause 12.5.2 (c) specifies that FCA shall be passed on to all categories of consumers except LT- V Agricultural. It's presumed that State government consented to grant subsidy for that category only.</p> <p>(b) Sub-clause 12.5.3 (e) requires Discoms to publish the FCA charges along with gist of its computation within 45 days of the end of the relevant month, failing which the claims will not be allowed. Forfeiture of claims for delay may be arbitrary/unfair, especially when the FCA is to be billed in N+3 rd month without prior approval by the Commission.</p> <p>(c) Sub-clause 12.5.5 (a) requires publication of FCA charges along with gist of computation in 5 daily News papers at huge cost which also accounts for revenue expenditure and is recoverable through Tariffs. If in a particular month the FCA charge is so meagre that it's not worth incurring expenditure for publication etc, Discoms may be given option to claim the</p>	<p>(a) As per the Regulation no. 1 of 2023, TS Discoms have to claim the FCA of LT V Agricultural consumers from GoTS. Accordingly, the TS Discoms shall approach GoTS.</p> <p>(b) TS Discoms agrees with the view of the Objector in the matter of forfeiture of claims for delay and had made submissions regarding the same in the proceedings for finalization of the Draft Regulations. TS Discoms requests Hon'ble Commission to make suitable amendments or atleast provide relief by allowing such claims, if any in the trueup filings.</p> <p>(c) TS Discoms shall abide by the directives given by the Hon'ble Commission.</p> <p>(d) The auto pass through component of FCA of 30 paise is on lower side in comparison with the FCA guidelines of some other states. In States such as Rajasthan and Haryana FCA auto pass component is</p>

	<p>same in the quarterly filings and the shortfall may be allowed to be recovered in the next quarter.</p> <p>(d) Sub-clause 12.5.2 (b) rightly specifies ceiling on FCA for automatic pass through, but 30 paise/unit appears on high side especially for subsidized domestic subcategories.</p> <p>(e) The amendments under para 5.1 and 5.2 on Repeal and Savings, may have to be inserted under a new Clause 24-A after Clause 24 of the Principal Regulation.</p>	<p>limited at 15% of approved weighted average power purchase cost, which would work out to be significantly more than 30 paise.</p> <p>(e) The comment/ suggestion is under the purview of Hon'ble Commission.</p>
4	<p>Hon'ble Commission may please examine the following aspects after hearing the stakeholders during the public consultation process of the Tariff Order for 2023-24.</p> <p>i. The comfort derived by Discoms in managing the working capital requirement due to automatic monthly pass through will cause undue hardship to crores of consumers and is contrary to the consumers interests mandated u/s 61(d) of the Act.</p> <p>ii. The instructions issued by MOP in its letter dated 9th Nov 2021 has no sanction of law and the Rule 14 of the Electricity (Amendment) Rules, 2022 notified by Central Government on 22nd Dec 2022 is ultravires the Electricity Act 2003.</p> <p>iii. If however monthly recovery is expedient, a committee comprising of consumer's organizations nominated by the Hon'ble Commission may be allowed to scrutinize the data before publication in news papers, by extending the 45 days period to 60 days.</p> <p>iv. Hon'ble Commission may please take a view whether post approval quarterly adjustment can be permitted for 2023-24, in exercise of the power vested under sub-clause 24.2 of the Principal Regulation no.4 of 2005, and record the same in the Tariff Order of 2023-24.</p>	<p>(i) The applicability of FCA consequently saves consumers against any claims towards increased working capital requirement of Discoms for a prolonged period. Effectively, FCA safeguards consumers against the interest costs that Discom would have to pay for to meet revenue requirements to clear bills of power generation companies caused by variations in fuel prices. It is also to be noted that FCA mechanism also refunds the consumers in case there is a decrease in the cost of fuel.</p> <p>(ii) to (iv) The objections are under the purview of the Hon'ble Commission.</p>

	Submitted for consideration by the Hon'ble Commission in public interest.	
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2023-24 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదన లు & క్రాస్ సబ్సిడీ సర్పార్టీ ప్రతిపాదనలు మరియు ట్రా-అప్ చార్జీల పై వెంకట్రామ్ బానోత్, C/o. వెంకటేశ్వర క్రషర్, గ్రామం: ఫతేపూర్, మండలం: ఛీల్పూర్, జిల్లా : జనగాం గారి సూచనలు/సలహాలకు సమాదానాలు

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	TSNPDCL - సమాదానాలు
1.	<p>విషయం: 2023 -24 సంవత్సరం సంబంధించి ARR పై సలహాలు/సూచనలు, పలు అభ్యంతరాలు విన్నవించుట గూర్చి.</p> <p>అయ్యా,</p> <p>మనవి ఏమనగా న పేరు వెంకట్రామ్ బానోత్ గ్రామం: ఫతేపూర్, మండలం: ఛీల్పూర్, జిల్లా : జనగాం చెందిన నాకు, తమరు నిర్వహించే బహిరంగ విచారణ లో నాకు మాట్లా డటానికి అవకాశం ఇవ్వగలరని ప్రార్థన</p>	<p>గౌరవ కమీషన్ వారి పరిధిలోని అంశం.</p>

Replies to the Objections/Suggestions raised on ARR & FPT including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 and Power Purchase true-up from FY 2016-17 to FY 2022-23 (Prov) for Retail Supply Business by Sri P. Ravi Kumar, Director(Technical/Transmission), HMWS&SB, Khairatabad, Hyderabad-500004.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
i)	Sanction: HMWSSB requests the Hon'ble TSERC to continue to sanction concessional Power Tariff at the rate of Rs.4.95 paise per kWh for the FY 2023-24 onwards on perpetual basis.	TS Discoms shall abide by the directions of Hon'ble Commission and GoTS.
ii)	Special category: As was observed by the Hon'ble TSERC in its Orders passed on the earlier occasions, particularly Order dated 22-10-2022, we request to allot a Special Category for sanction of concessional Power Tariff for HMWSSB exclusively in line with HMRL.	TSERC Order Dated 22-10-2022, it is ordered that "these shall be no further determination or decision or creation of a separate category of tariff for HMWSSB for FY 2022-23" Further, it is also informed TS Discoms are contemplating to reduce the number of slabs and consumer categories which leads towards 'Tariff Schedule rationalization" in line with MoP directives and National Tariff Policy-2016.
iii)	The facility of concessional Power Tariff may also be extended to (a) all STP stations, and (b) all Office Buildings.	The request of HMWS&SB will be considered after the commitment of subvention from GoTS to provide subsidy to all STP stations and all office buildings.
iv)	Subvention: As per the directions of the Hon'ble TSERC, HMWSSB has been following with the GOTS for payment of subvention amount and accordingly HMWSSB has got the Subvention amount, which was paid directly by the GoTS to TSSPDCL (Copies of G.Os are enclosed as Annexure-6). The Hon'ble TSERC's kind attention is drawn in the letter of GOTS, Energy Department vide letter dated 30-06-2022, wherein GoTS has invoked Section 10 of the Electricity Act, 2003 while assuring that it would take care of payment of Subvention amount for the past and future period, compensate DISCOMS suitably.	The details of year wise billing amount, Subvention amount (Concessional tariff), Subvention amount received from GoTS & Payment received from HMWS&SB and balance Out Standing amount at the end of the FY 2018-19 to FY 2022-23 (up to January) as follows:

		(Rs. in Crs)					
Sl.No.	F.Year	Opening Balance	CC bill amount	Subvention Amount	Subvention amount received from Government	Payment received from HMWS & SB authorities/ JE	Closing Balance
1	2	3	4	5	6	7	8=3+4-6-7
1	18-19	44	172	44	44	90	83
2	19-20	83	218	53	53	92	157
3	20-21	157	234	51	51	0	340
4	21-22	340	240	48	23	0	556
5	22-23 (Upto Jan-23)	556	237	40	5	13	775
Grand Total :		44	1101	236	175	195	775
v)	HMWSSB has already requested the GoTS for extending facility of concessional Power Tariff to HMWSSB for the FY 2023-24 onwards on perpetual basis and also extend the facility to (a) STP stations, and (b) office Buildings. A copy of the letter No. 219 dated. 13.07.2022 is enclosed for perusal as Annexure-7.		The request of HMWS&SB will be considered after the commitment of subvention from GoTS to provide subsidy to all STP stations and all office buildings.				

Replies to the Objections/Suggestions raised on ARR & FPT including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 and Power Purchase true-up from FY 2016-17 to FY 2022-23 (Prov) for Retail Supply Business by Sri GRK Prasad, Nava Bharat Energy India Ltd, Nava Bharat Chambers, Raj Bhavan Road, Hyderabad-82.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	Our objections against the proposed Grid Support Charges are set out below for this Hon'ble Commission's kind consideration and disposal:	
1	<p>THE IMPACT OF THE ELECTRICITY ACT, 2003:</p> <p>In 2003, the Electricity Act, 2003 ("Act") came into force. The Act brought in substantial changes to the previous regime, including the establishment of State Commissions, delicensing of Generation, unbundling of transmission and distribution, specification of tariffs and charges, crystallized the scheme of Open Access, brought in procedures and standards to enforce discipline, etc. However, it left the Commissions established by States under earlier State enactments (such as the AP Electricity Reform Act, 1998) untouched and treated them to be Commissions established under the Act, essentially conferring them with powers under both Acts, in as much as the State enactments were not in derogation to the Act.</p>	No Comments
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 Comments
	<p>No jurisdiction to Propose or Levy GSC:</p> <p>2.0 Earlier TS DISCOMS proposed to levy the grid support charges on captive generating plants considering captive load burden on Grid . But we surprise to note that now the DISCOMS proposed to levy such charges on all generating plants including Independent power generating plants and Merchant power generating plants without</p>	All the generators who are connected to the grid also enjoy the same benefits as the Captive Power Plants. In this regard, the Discom has proposed Grid Support Charges for all the Generators except those who have PPAs with the

	<p>explaining any reason/basis for levy of such charges.</p> <p>2.1 The IPPs and Merchant power generating plants are meant for generate and export entire power to grid and accordingly always supportive to grid but never opt grid support to run the plant.</p>	Discoms.
3	<p>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.</p>	<p>The grid support charges are being proposed by the Distribution Licensee for consumers who are having parallel operation of all the generators with grid except those who have PPAs with the Discoms. The Distribution Licensee's 132kV & above level HT consumers are not paying Transmission charges & SLDC charges to respective entities even though connected to 132kV & above level. These consumers are paying retail supply Tariffs as approved by the Hon'ble State Commission from time to time which is inclusive of all costs (Incl SLDC & Transmission Charges).</p>
4	<p>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.</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 2023-24 are well within the provisions of Act.</p>
5	<p>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</p>	<p>However, the full Bench of Tribunal in Appeal No. 120 of 2009 relating to Parallel Operation Charges(Grid Support</p>

	relevant to IPPs and Merchant Power generating plants. 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.	Charges) in Chhattisgarh 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. The licensee has not denied CPPs access to grid or availing of parallel operation benefits. It is clarified that the captive generators who intended to use and benefit from parallel operation need to pay the Grid Support charges, in line with the justifications mentioned in the previous sections.
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 I 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:	No Comments
7	The Applicant Discoms have proposed Grid Support Charges for all generators, including captive, cogeneration, merchant power plants/IPP, rooftop power plants etc., which is completely against the reasoning of GSC in the first place.	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. <ul style="list-style-type: none"> • 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. • 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.

- 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

		<p>grid acts as the supporting system for the CPPs for its successful operation in terms of electrical performances. However, the grid support being an ancillary service extended by the licensee to the consumers, it has to be charged to the consumers who utilize the grid support.</p> <p>The full Bench of Tribunal in Appeal No. 120 of 2009 relating to Parallel Operation Charges (Grid Support Charges) in Chhattisgarh by Order dated 18.02.2011 stated that <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. Hence, the levy of grid support charges is well within the provisions.</p> <p>The grid support charges are not for drawl of power from the Distribution Licensee, but for utilization of parallel operation benefits by captive generators.</p> <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</p>
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		<p>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 2023-24 are well within the provisions of Act.</p> <p>The above benefits are elaborated by TS Discoms during the GCC meetings with the stakeholders.</p>
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.	<p>The proposed grid support charges of 50% of 475 per KVA per month during the FY 2022-23 RST filings, was supposed to 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).</p> <p>Considering the interest of all stakeholders involved, the licensee has revised its GSC proposal as :</p> <ul style="list-style-type: none"> ☐ The parallel operation/grid support charges are to be applied to the total installed capacity of the generators connected to the Grid ☐ Conventional generators shall pay Rs.50 per kW per month ☐ 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. ☐ Rooftop solar plants under net metering/gross metering policy shall pay Rs.15 per kW per month.
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.	
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.	

		<p>☐ 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.</p>
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.	The detailed responses are already given in above Section 3 to 6
13	There is no provision in the statute that empowers the DISCOMS to levy Grid Support Charges on the Merchant power plants	The detailed responses are already given in above Section 3 to 6
	<p>PRAYER:</p> <p>That, in view of the above, we pray that the Hon' ble Commission may be graciously pleased to</p> <ol style="list-style-type: none"> 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 the Electricity Act, 2003 and the National Electricity Policy, 2005 to provide connectivity to the generating stations 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 To hold the levy till the third-party analysis is completed to the satisfaction of the Hon 'ble TSERC; 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 Consider our foregoing objections, grant us a personal hearing 	<p>The detailed responses for levy of Grid Support Charges by TS Discoms are already given in above sections.</p> <p>Hon'ble TSERC has entrusted the responsibility of discussing and proposing the Grid Support Charges/ Parallel Operation Charges to the TS Grid Co-ordination Committee (GCC).</p> <p>The GCC has conducted meetings with all the stakeholders on different occasions to gather their views on the levy of GSC/POC. The detailed objections/ suggestions from the stakeholders received during these meetings were already addressed orally and in written by TS Discoms.</p> <p>Some of the stakeholders like CESS Siricilla, M/s PTC India, Mytrah Vayu (Godavari) Ltd., and representative of STU & person nominated by Hon'ble TSERC under clause 5.3(n) – Chief Engineer/ Transmission have expressed that they are in line with the views of TS Discoms and that the levy of</p>

	<p>and grant leave to adduce further evidential data in our support at the time of hearing;</p> <p>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.</p>	<p>Grid Support Charges is justified.</p> <p>Hence, TS Discoms request Hon'ble Commission to approve the proposal for levy of Grid Support Charges. TS Discoms would abide by the directions of Hon'ble Commission in this regard.</p>
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2023-24 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదనలు మరియు క్రాస్ సబ్సిడీ సర్పార్ట్ ప్రతిపాదనల మరియు ట్రా-అప్ ప్రతిపాదనలు పై ఎస్. గోపాల్ రెడ్డి, గద్వాల గారి సూచనలు/సలహాలకు సమాదానాలు

అభ్యంతరాలు /సూచనలు	TSNPDCL - సమాదానాలు
<p>-19 మొత్తం రోజులు రెండు సవత్సరములు నెలలు రెండు వారములు ఐదురోజులు తెలంగాణ 20.03.2020 మొదటి కేసు నమోదు డిస్కామ్ ల ప్రతిపాదన 2020,2021 మరియు 2022 అనుమతి అదనపు ఖర్చులు అబద్ధము తప్పులు తడకగా ఉన్నది ట్రా అప్ చార్జీ లను స్వచ్ఛందంగా తిరస్కరణ జరపగలరని ప్రార్థన.</p>	<p>మీఅభిప్రాయాన్నిపరిగణలోకి తీసుకున్నాము</p>
<p>విశాల ప్రయోజనాలు "మామూలు ప్రజానీకానికి " మామూలు జనానికి గంపగుత్తగా ప్రజల పై వినియోగదారుల పై కరెంటు బిల్లు లభారం "ఫిబ్రవరి 2022" మోపినారు మరల మార్చి2023 బిల్లు లు అధికం అంటూ మరోమారు ప్రయత్నం విరమించుట మంచిది. ప్రజలు స్వచ్ఛందంగా సిమ్ ల మార్పు చేసుకుంటున్నారు కాలానుగునునాగా ఏ సిమ్ తక్కువ చార్జీలు వసూలు ఉచితాలు కల్పిస్తే ఆ సిమ్ మార్పులు జరుగుతున్నాయి "ట్రా ఆఫ్ చార్జీలను నిలిపివేయగలరు".</p>	

ప్రాజెక్ట్ పనులు అసంపూర్తి ఆయకట్టు చివరి గ్రామాలూ ,తండాలు సాగు నీరు నామ మాత్రమే రైతుకు మీటర్లు అనే పదము భారతీయులకు వర్తింపచేయరాదు, చేయకూడదు. ట్రూ ఆఫ్ చార్జీలు వర్తింప రైతులకు వర్తించరాదు .

ఇంటి బిల్లు ల: 50 మంది 100 యూనిట్ ఉచిత విద్యుత్ గా పరిగణించాల , ప్రతి గృహ విద్యుత్ బిల్లు కంటే ఎక్కువగా సర్ , ఫిక్స్ , కస్టమర్ ఎలక్ట్రిసిటీ డ్యూటీ అడిషనల్ విద్యుత్ వాడకం 26 యూనిట్ బిల్లు అసలు కంటే కొసరు ఎక్కువగా ఉన్నది ఈ చార్జీలను పూర్తిగా తీసివేయాలి.

తెలంగాణ రాష్ట్రంలో విద్యుత్ వినియోగం 26 యూనిట్ 50/100 గృహ అవసరములకు రాష్ట్ర రాజధాని చుట్టు 70 లక్షల ఇళ్లు వెనుకబట్టు కలిగిన పాత పాలమూరు మహబూబ్ నగర్ జోనల్ తండాలు గ్రామాలూ పరిశీలను తీసుకుగలరు ట్రూ ఆఫ్ చార్జీలు పెప్పును ఉపసహరించుకొగలరు .

IEX కరెంటు కావలిసివస్తోది వ్యవసాయానికి వర్షకాలం విద్యుత్ వినియోగం తక్కువ ఎండ కాలం సాగునీటి ప్రాజెక్ట్ నీటిని విడుదల ఎక్కువ చేయడానికి ప్రతి సంవత్సరం ప్రయతనం జరుపుతున్నది కాబట్టి ఫిబ్రవరి , మార్చి ,ఏప్రిల్, విద్యుత్ వినియోగం రైతులు ఆశీస్తు న్నారు

<p>ఒక సబ్ స్టేషన్ పరిశీలించింది విద్యుత్ వినియోగం వివరాలు వీధిలైట్లు గ్రహ అవసరాలు వ్యవసాయ అవసరాలు ట్రా ఆఫ్ ఇస్తూ చూపిస్తున్న తప్పుగా ఉన్నది .</p>	
<p>గ్రహ సర్వీస్ వైర్లు మున్సిపాలిటీ పరిశుద్ధ వెహికల్స్ తగులు తున్నాయి విద్యుత్ మరణాలకు 25 లక్షలు కోరుట గురించి చిన్నసన్నకారు రైతులు ఉచిత ట్రాన్స్ఫార్మర్స్ 11 , LT లైన్ అండ్ AB స్విచ్ కోరుట గురించి.</p>	
<p>ACD అనే మాట ప్రజలపై ఊదేసాపుర్యకంగా ఒత్తిడి 2 నెలలు సగు బిల్లు కట్టి చటం RBI వడ్డీ వరతిపచస్తా మనటం నిలువు దోపిడీగా ప్రజలు అభివారినిస్తున్నారు గ్రామీణ తండా విద్యుత్ లు అధికారులు కాంట్రాక్టర్లు వాసులు చేయచారు ఎలాంటి చిట్టి ఈ మధ్య కలం మీటర్ రీడింగ్ మీటర్ నుంచి జరుగుతున్నది. విద్యుత్ వాడకం 26 యూనిట్స్ ఉంటే నెలలో చూపించటం అధికారుల నీవెరిపోతున్నారు అదే విధంగా ట్రా ఆఫ్ 2020, 2021, 2022 చార్జీలు మీటర్ జపింగ్ లు గా లకు చూయించి ట్రా ఆఫ్ నిలువరించగలరు.</p>	
<p>TSSPDCL, CGRF లు కాంట్రాక్టర్స్ వ్యవస్థకు లోబడి ఉంటునాయి పెత్తనం కాంట్రాక్టర్స్ దే ట్రాన్స్ఫానేర్స్ కాలిపోయినది ,11KV, 32KV</p>	<p>TSSPDCL కు సంబంధించినది.</p>

<p>సర్దుపాటు ట్రాన్స్ఫార్మర్స్ కట్ట మొదలైనవి వ్యవసాయ రైతు 2500 వేలు వరకు ఖర్చు చేసుకోవలసి ఉంటుంది . అభ్యర్థనలూ కంప్లి అంట్స్ CGRF, ERC చేతగాని తనంగా చూస్తున్నాయి ట్రూ ఆఫ్ మరిచిపో వట గూర్చి విద్యుత్ వ్యవస్థ కాంట్రాక్టర్స్ చైతిలోకి వెళిపోయినది. కాంట్రాక్టర్స్ లేని పక్షంలో Lineman, AE విద్యుత్ వ్యవస్థ AC రూంలకే</p>	
<p>ప్రతి నెల సర్దుబాటు అనే మాట రానివ్వకుండా ఉద్యోగుల భద్రత అనేది ఉంటుంది RTC హైదరాబాద్ పరిశీలన BSNL పరిశీలన Mee- Sava - రెవిన్యూ వ్యవస్థ పరిశీలన చేయగలరు ఉచిత విద్యుత్ రామోజీరావు గారు వృద్ధాప్యంలో దివచ్చింతన ఒక రూమ్ 1 మీటర్ 26 యూనిట్స్ వినియోగం 100, గోపాల్ 1 రూమ్ 26-100 ఉచితంగా పరిశీలించి పరిగణలోకి ప్రభుత్వం తెలిపి , ఓపిమ్మి ఉచితంగా 100 km ఉద్యోగుల భద్రతకు అవసరంగా భావించి అంగీకరించగలరు .</p> <p>1) విద్యుత్ పైవేట్ పరం కేంద్రం నిర్ణయంను ప్రజలు స్వచ్ఛందంగా ముందుకు వచ్చి రాత పూర్వక అర్జీలు ఇవ్వటం జరుగుతుంది . ACD, ట్రూ ఆఫ్ అండ్ కాంట్రాక్టర్స్ వ్యవస్థ ముందుఉండి నీరుమళించగలరు.</p>	<p>అభిప్రాయాన్ని పరిగణలోకి తీసుకున్నాము.</p> <p>ఇది ట్రాన్స్క్రీ సంబంధించినది.</p>

2) దక్షిణ భారత్ రాష్ట్ర విద్యుత్ నియంత్రణ మండలి (NRERC) చైర్మన్ అభిప్రాయ నియోధిక 7th January 2023 ఒక ప్రతి ఇవ్వగలరు. స్వామి నాథ కమిటీ తెలంగాణ విద్యుత్ సంస్కరణ చట్ట 1998 యొక్క Sec 21(4) విద్యుత్ చట్టం 2003, Sec 62, 8611. 2021-22 గ్రాస్ డొమెస్టిక్ రాష్ట్రము GSDPI శాఖ DEs తిలిపిన నివేదిక పరిశీలించగలరు . వినియోగ దారుల సేవాభాట సథరస్ పవర్ డిస్ట్రిబ్యూషన్ చత్తిస్లట్ విద్యుత్ అగ్రిమెంట్ కాపీ కోరుతున్నాయి . రామగుండం స్టేషిన్ 800 మెగా వాల్ట్స్ సింగరేణి బొగ్గు ఉతపతి జురాల విద్యుత్ వినియోగం వీటిని అన్నిటిని పరిశీలన ముందుకు వెలవలసినది కోరుతున్నాము.

వ్యవసాయానికి ప్రభుత్వ సబ్ సిడిలు , మన బొగ్గు, మన జల విద్యుత్ మన సోలార్ అమ్మకానికి 1500 మెగా వాట్లు మంగళవారం January-24-2023 పేపర్ ప్రకటన కొనేవారు లేక ప్రకటన జారీ చేస్తున్నారు నిదర్శనం.

దివాళా బోర్డు తగిలించుకున్న విద్యుత్ లు విదేశీ బొగ్గు కరెంటు N+2, N+3 విద్యుత్ సులభ కనెక్షన్ Oct 2022 నుండి నమోదయినాయి ముఖ్యంగా సింగరేణి నుండి three Phase March, January రీడింగ్ ప్రకారం ఈసే దగ్గర డిస్కామ్లు ప్రతిపాదన పెట్టి ఊడవచు నిరోధిచగలరు. కాంట్రాక్టర్స్ చైతిలో డిస్కామ్లు, డిస్కామ్లు చైతిలో ERC అనే మాట ప్రజలలోకి వెళ్లరాదని తెలుపుకుంటూ స్వచందంగా ఉచిత విద్యుత్ రామోజీ రావు గారికి అయన సావిటి కాది గోపాల అగీకారం , అగీకరించగలరని పారాధనలు.

ఉద్యోగ సంఘము, రైతు సంఘము, గృహ వినియోగ దారులు సంఘము, , మగ్గం సంఘము, టీవీ Xerox, కంప్యూటర్ 10,000 లోపు ఉపాధి సంఘము.

విద్యుత్ నియంత్రణ మండలికి విన్నపాలు జోడిస్తు న్నాయి అబీయార్థులు పరిశీలన ట్రూ ఆఫ్ ACE నిరించ చైగలరు. పబ్లిక్ హీరింగ్ ARR-FPT 2022-23 లు గ్రహ విద్యుత్ పెంచటం జరిగింది.

విద్యుత్ మస్యల పరిష్కారం వినియోగదారుల సేవబాట CGRF నిరుపయోగంగాఉన్నది కావున దయ ఉంచి ఒత్తిడులకు బగ్గ కుండా ACD

ట్రూ ఆఫ్ విద్యుత్ వినియోగ తప్పుడు బిల్లు లు గ్రహ విద్యుత
అనుసంధానం చేయరాదు ERC డిస్కాముల వాదనను అంగీకరించరాదు
తప్పుడు 2020, 2021, 2022 లెక్కలను తోసివేయగలరు.

2023-24 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదనలు మరియు క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనల మరియు ట్రా-అప్ ప్రతిపాదనలు పై పి. మురళీధర్, హనుమకొండ గారి సూచనలు/ సలహాలకు

సమాదానాలు

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TSNPDCL - సమాదానాలు
1.	<p>Category-III ప్రార్థనా స్థలాలకు సంబంధించిన 6.40 మరియు 7.00 రూ.ల ఉన్న 5.00 రూ.ల per unit గా చేసి తగ్గించడానికి A.R.R లో ప్రతిపాదించినందుకు SPDCL NPDCL మరియు CESS సిరిసిల్లా వారికి కృతజ్ఞతలు తెలియజేస్తూ గౌరవ కమిషన్ వారు అనుమతించాలని ప్రార్థిస్తూ న్నాము.</p>	<p>ప్రార్థనా స్థలాలకు సంబంధించి తగ్గించిన ధరల యొక్క డిస్కంల ప్రతిపాదనలను సమర్థించినందుకు దన్యవాదములు.</p>
2.	<p>H.T-III క్యాటగిరిలో ఎయిర్ , రైల్వే స్టేషన్ మరియు బస్ స్టేషన్ల ఉన్న నుండి ఎయిర్ పోర్టును విడదీసి Category క్రిందకు తీసుకువచ్చి తగిన Tariff నిర్ణయించాలి. రైల్వే స్టేషన్లు, బస్ స్టేషన్ లను ఎయిర్ పోర్టులకు వేరేగా చూడాలి. ఎయిర్ పోర్టులో Parking, Air Cargo, మరియు ఇతర సేవలకు రైల్వే, బస్సు స్టేషన్లలో ప్రయాణికులు చెల్లించే రేట్లకు చాల తేడాలు ఉన్నాయి. ఎయిర్ పోర్టులు పూర్తిగా వ్యాపార దృక్పథంతోనే నడుస్తున్న సంస్థ. రైల్వే, బస్ స్టేషన్ లు సామాన్య ప్రజల సేవకు పాత్రమవుతున్నాయి. గౌరవ కమిషన్ వారు ఇటీవల ఆదేశాలలో Aviation మరియు Non-Aviation ను విడదీయమని తెలిపారని ప్రస్తుత A.R.R 0.16 ఐటమ్ 0. 4</p>	<p>లైసెన్స్ పరిధిలో లేని అంశం.</p>

Tariff Order 2022-23 లో o.244, ఐటమ్ o. 4లో తెలిపారు. సమాధానంగా ఆదేశాలను పాటిస్తామని తెలిపారు. 2022 సెప్టెంబర్ వరకు కమిషన్ వారు సమయమిచ్చినా, ఇంతవరకు ఏమి చేసారో తెలపలేదు.

ఏ క్యాటగిరికి సంబంధించిన సర్వీసులు ఎన్ని ఉన్నాయి? మొత్తం G.M.R. ఎయిర్ పోర్టు 5400. ఎకరాల విస్తీర్ణంలో End Use Aviation, Non-Domestic మరియు Commercial Star Hotels, Advertisements మనకు బాహ్యంగా కనిపిస్తున్నాయి ఇందులో End Use ఆధారంగా ఏ Category సర్వీసుల్లో ఎంత వినియోగం అవుతుందో తెలియజేయండి. H.T. లో అడ్వర్టైజ్మెంట్ క్యాటగిరికి టారిఫ్ నిర్ణయించబడలేదు. End Use ను దృష్టిలో పెట్టుకొని కమిషన్ వారు తెలిపిన ప్రకారంగా Tariff అమలు చేయడానికి ఆస్కారమే లేదు. Tariff లేని ఎలా అమలు చేస్తారో తెలియజేయగలరు. 30-09-2022 వరకు ఆదేశాలు పాటించకుంటే అత్యధిక Tariff గా తరువాత A.R.R. లో ప్రొజెక్షన్ చూపించమని కమిషన్ తెలిపారు. అత్యధిక టారిఫ్ ప్రొజెక్షన్ ఈ A.R.R. లో చూపించలేదు.

గౌరవ కమిషన్ వారు వాస్తవ End Use ను పరిశీలించజేసి L.T. -2 C Advertisement Hoardings 13 రూ.లుగా L.T. లో ఉన్న Tariff (ధరలు) ను దృష్టిలో యుంచుకొని ధరలు నిర్ణయించి, లాభాపేక్షతో పని

	<p>చేస్తున్న G.M.R. ఎయిర్పోర్ట్ ద్వారా నష్టపోతున్న ఆదాయాన్ని పరిగణనలోకి తీసుకొని సరియైన ధరను రాబట్టా లనికోరుచున్నాము.</p>	
3.	<p>ట్రాన్స్ ఫార్మర్ల రవాణా : గ్రామీణ వినియోగదారులు - SPDCL పరిధిలో 14 సర్కిల్లో 15,761 D.T.R. లు స్వంత రవాణా చేసుకున్నారని, A.R.R. ' నెం. 85లో తెలియపరిచారు. అత్యధికంగా నల్గొండలో ఉన్నాయి. నెం. 81లో 9041 D.T.R. లు రైతులే రవాణా చేసుకున్నారని తెలిపారు. ఇందులో గమనించాల్సిన విషయం D.T.R. వినియోగదారులే (రైతులే) తీసుకు వచ్చారంటే ఎవరు దింపారు? ఎవరు బండిలో లోడ్ చేసారు? సంబంధించిన T-Note ఇతరత్రా పేపర్ వర్క్ ఎవరు చేసారు? (ఎంత ఖర్చు పెట్టా రనేది క్షేత్రస్థాయి పరిశీలనలో తేలుతుంది) ఎవరు అన్లోడ్ చేశారు? " చేయించడానికి కానీ లేక రీఫ్లెక్టుంట్లు కానీ రైతులకెంత ఖర్చు అయింది? D.T.R. Fit ఎవరు చేసారు? ఎంత ఖర్చు అయింది? ఇట్టి Process లో నైపుణ్యం లేని వారు ఈ పని చేసినందుకు ప్రమాదాలు ఎన్ని జరిగాయి? ఒకవేళ జరిగితే ఎవరు బాధ్యత వహిస్తారు?.</p>	<p>గ్రామీణ ప్రాంతాల్లో రాకపోకలు సాగించడానికి వీలులేని పరిస్థితులలో మరియు యాసంగి, వాన కాలము లో అధిక డిటీఆర్లు కాలిపోయినపుడు, అనివార్య పరిస్థితుల్లో కొన్నిసార్లు డిటీఆర్లను రైతులే రవాణా చేస్తున్నారు అయితే, అటువంటి సందర్భాలలో కూడా కాలిపోయిన డిటీఆర్ తీసివేయడానికి, రవాణా చేయడానికి మరియు పెట్టడానికి కేవలం డిపార్ట్మెంటల్ సిబ్బంది పర్యవేక్షణలో జరుగుతున్నాయి. చిన్న రేటింగ్ సామర్థ్యం కలిగిన కాలిపోయిన DTR లను డిపార్ట్మెంటు వెహికల్ ద్వారా చాల మటుకు ట్రాన్స్ పోర్ట్ చేస్తున్నాము.</p>
4	<p>ప్రతి Agricultural Service వద్ద 15 వోల్టుల బల్బు వెలిగించుకోవడానికి గతంలో గౌరవ కమిషన్ వారు అనుమతించారు. న్యూట్రల్ వైర్ లేకుండా బల్బు అవకాశం ఉండదు. కావున న్యూట్రల్ వైరు సౌకర్యం కావాలని గౌరవ కమిషన్ వారిని అర్థించగా వారు అనుమతించారు. డిస్కమ్ వారు</p>	<p>ఇట్టి సూచనను పరిశీలించగలము.</p>

	<p>దశల వారీగా న్యూట్రల్ వైర్ సౌకర్యం కల్పిస్తామని తెలియజేశారు. కానీ ఇప్పటి వరకు అట్టి సౌకర్యము రాష్ట్రంలో ఎక్కడా కల్పించడం లేదు. వెంటనే న్యూట్రల్ వైర్ సౌకర్యం ఏర్పడేటట్లు తగిన చర్యలు తీసుకోవాలని గౌరవ కమిషన్ గారిని కోరుచున్నాము.</p>	
5	<p>విద్యుత్ ప్రమాదాల వల్ల దుర్మరణాలు చెందిన వారి సంఖ్య SPDCL, ARR లో నెం. 267, 268లో NPDCL నెం. 87, 97లో వివరించారు. (తక్షణ సహాయం కూడా చెల్లించామని తెలిపారు. NPDCL వారు దుర్మరణానికి కారణాలు కూడా వివరించారు. SPDCL వారు కారణాలు వివరించలేదు. ప్రమాద కారణాలను గుర్తిస్తే వాటిని అరికట్టే చర్యల గురించి ఆలోచించవచ్చు. తగిన చర్యలు తీసుకోవచ్చు. మరణాలకు ఎక్స్ గ్రేషియా బాధిత కుటుంబానికి పరిష్కారం కాదు. అది తాత్కాలిక ఉపశమనం మాత్రమే. దుర్మరణాలను తగ్గించడానికి తగిన చర్యలలో భాగంగా వినియోగదారులు ఏమి చేయాలి? డిస్కమ్ బాధ్యత ఏమిటి? అనేది అవగాహనా గ్రామస్థాయిలో సదస్సుల ద్వారా, Wall Writing ల ద్వారా Flexi ల ద్వారా గ్రామాల్లో మరియు డిస్కమ్ ఆఫీస్ లో గ్రామ, మండల, పంచాయితీ మరియు తహసీల్దార్ కార్యాలయంలో ఏర్పాటు చేసే ప్రయత్నం చేయాలని డిస్కమ్ మరియు కమిషన్ వారిని కోరుతున్నాము. SPDCL CMD రఘుమారెడ్డి గారు సంక్రాంతి సందర్భంగా పతంగులు ఎగురవేసే వారు ప్రమాదాలకు లోనుకాకుండా ఉండడానికి తగిన సూచనలు వివరణాత్మకంగా ఇచ్చారు. అటువంటి</p>	<p>i. జనవరి-2023 వరకు మానవులకు సంభవించిన మొత్తం ప్రమాదాల సంఖ్య 344 వాటిలో 296 ప్రమాదాలు వినియోగదారుల వైపు నుండి 85% వినియోగదారుల వైపు కారణంగా సంభవించాయి.</p> <p>ii. గౌరవనీయులైన CMD గారు విద్యుత్ భద్రతా చర్యలపై విస్తృత అవగాహనా కలిగించేందుకు ప్రింట్ మీడియా ద్వారా ఈ క్రింది సూచనలు చేసారు .</p> <p>a. విద్యుత్ వినియోగదారులు ISI ఉపకరణాలు వినియోగించి భద్రత సూచనలు పాటించడం ద్వారా విద్యుత్ ప్రమాదాలు నివారించవచ్చు.</p> <p>b. రైతులు వ్యవసాయ పంపుసెట్లు వాడుతున్నప్పుడు మోటార్, పైపులు , ఫుట్ వాల్వులను ఏమరపాటుతో తాకరాదన్నారు. పంపుసెట్లను విధిగా ఎర్ట్ చేయించాలన్నారు. పంపు సెట్లవద్ద సాంకేతిక లోపం తలెత్తితే సొంత మరమ్మతులు చేపట్టవద్దన్నారు.</p> <p>c. దుస్తులు ఆరేసే దండెం విద్యుత్ తీగలు తాకకుండా చూసుకోవాలన్నారు.</p> <p>d. పంటల రక్షణ కోసం ఏర్పాటు చేసిన కంచెకు విద్యుత్ కనెక్షన్</p>

చర్యలు గ్రామీణ ప్రాంతంలో కూడా చేపట్టా ఓ. విద్యుత్ షాక్ వల్ల గాయపడిన వారికి కూడా తక్షణ సహాయం అందించాలి.

ఇవ్వడం మరియు కాలువల వెంట అనధికారికంగా బిగించిన మోటర్లవలన మనుషులతో పాటు జంతువుల ప్రాణాలు పోతున్నాయి కావున రైతులు పంట రక్షణకు విద్యుత్ కంచెను ఏర్పాటు చేయకూడదని అలాగే అనధికారికంగా మోటార్ లు బిగించి వాడరాదని సూచించారు.

- e. విద్యుత్ కనెక్షన్ తీసుకునేప్పుడు నాసిరకం మెటీరియల్ వాడడం ప్రమాదకరం కనుక నాణ్యమైన పరికరాలను వాడాలని కోరారు.
- f. వర్షాలవల్ల లీకేజీ లు ఏర్పడి ఎర్త్ డెబ్బతిని తీగలు తెగిపోయి ప్రమాదాలు చోటుచేసుకుంటున్నాయి కావున ప్రజలు ముఖ్యంగా గ్రామీణ ప్రజలు వర్షాకాలం లో తగిన జాగ్రత్తలు తీసుకోవాలని కోరారు.
- g. గాలి దుమారం వంటి ప్రకృతి వైపరీత్యాల వాళ్ళ కరెంట్ స్టంబాలు నేలకొరుగుతాయని, తీగలు తెగిపోతాయని, ట్రాన్స్ ఫార్మర్లు ధ్వంసం అవుతాయని ఇటువంటి సమయం లో ప్రజలు అప్రమత్తంగా ఉండాలన్నారు. విద్యుత్ అధికారులకు సమాచారాన్ని వెంటనే చేరవేస్తే వారు సకాలం లో తగిన చర్యలు తీసుకోని ప్రమాదాలు నివారిస్తారు
- h. రైతులు డిస్ట్రిబ్యూషన్ ట్రాన్స్ఫార్మర్ ల వద్ద అనధికారికంగా ఫ్యూస్ లు మార్చడం, రిపేర్లు చేయడం, ఏబి స్విచ్ లు ఆపరే

		<p>చేయడం వల్ల ప్రమాదాలు జరుగుతున్నాయన్నారు. విద్యుత్ సంబంధిత సమస్యలను 1800 425 0028 టోల్ ఫ్రీ నెంబర్ కు లేదా 1912 నెంబర్ కు ఫో మెసేజ్ ద్వారా తెలపగలరని కోరారు.</p> <p>1 నుంచి ఏడు రోజులపాటు NPDCL పరిధిలోని అన్ని సర్కిళ్లలో విద్యుత్ భద్రత వారోత్సవాలు నిర్వహించి అవహగాహన గోడ పత్రికలు, కరపత్రాలు, విద్యుత్ సిబ్బందికి భద్రతా సూత్రములు(మినీ బుక్ లెట్స్) పంపిణీచేయడం జరుగుతున్నది. భద్రత చర్యలు , జాగ్రత్తలు తీసుకోవాలని ప్రతి జిల్లా , మండల , గ్రామ సమావేశాలలో విన్నవించటం జరుగుచున్నది.</p> <p>రైతు తన యొక్క పొలమునకు ఏర్పాటు చేసిన విద్యుత్ కంచె ద్వారా విద్యుత్ షాక్ తగిలి మనుషులు లేదా జంతువులకు ప్రమాదం జరిగినప్పుడు ఆ పొలం యజమాని పై Plocie station లో 135 IND ELE ACT, 304(ii) IPC Section క్రింద FIR నమోదు చేయబడుచున్నది. ఇంత వరకు 2022-23 సంవత్సరంలో 17 కేసులు మరియు 2023-24 సంవత్సరంలో ఇప్పటి వరకు 1 కేసు నమోదు చేయబడినవి.</p>
6	<p>S.O.P. లో D.T.R. రిఫ్లెక్సింగ్ నగరాల్లో 24 గంటలు గ్రామాల్లో 48 గంటలుగా ఉన్నది. నగరాలలో వినియోగదారుల నుండి ఎటువంటి సహాయాన్ని ఆశించకుండానే నిమిషాలు లేక గంటలలో విద్యుత్ పునరుద్ధరణ చేస్తున్నారు గ్రామాల్లో కూడా 24 గంటలలో విద్యుత్ సరఫరా పునరుద్ధరణ జరిగేటట్లు చర్యలు . కానీ గ్రామాల్లో క్షేత్రస్థాయి సిబ్బంది అలసత్వం, అవినీతి వల్ల కావచ్చు. ఇంకేదైనా కారణం</p>	<p>కాలిపోయిన DTRలను మార్చడానికి పట్టే సమయాన్ని తగ్గించడానికి ప్రత్యేకంగా గ్రామీణ ప్రాంతాల్లో సరిపోను ఆరోగ్యవంతమైన DTR లను DTR మరమ్మత్తు కేంద్రాల వద్ద ఏర్పాటు చేయబడ్డాయి దాదాపు అన్ని సబ్ డివిజన్లలో DTR మరమ్మత్తు కేంద్రాలు ఉన్నాయి.</p> <p>i. వినియోగదారులకు అందుబాటులో TSNPDCL app లో Report on incident ద్వారా Photo పెట్టుట మరియు ఏమైనా</p>

కావచ్చు, విద్యుత్ సరఫరా పునరుద్ధరణ ఆలస్యం అవుతుంది అనేది వాస్తవం. D.T.R ట్రాన్స్ఫర్డ్ గ్రామీణ వినియోగదారులు (రైతులు) చేస్తున్నారని A.R.R. లో తెలిపారు. అంటే రైతులే కాలిపోయిందని గుర్తించి. డిస్కం సిబ్బంది దృష్టికి తీసుకువచ్చి, వారు మేము నిస్సహాయులమని తెలిపిన తరువాత ఎవరో ఒకరు రైతులందరినీ ఒక్కటిగా చేసి, డబ్బులు జమచేసి, వాహనం మాట్లాడి T-Note వ్రాయించి, ఇతర ఇబ్బందులన్నీ పడి బిగించిన తరువాత, విద్యుత్ సరఫరాకు పునరుద్ధరణ జరిగే అవకాశం ఉంది.

గ్రామాల్లో వల్ల డబ్బులు వసూలు చేసేవారు. ఇవ్వని వారిపై దౌర్జన్యం చేసేవారు. ఇలాంటి సివిల్, క్రిమినల్ పంచాయితీలు కూడా జరిగే అవకాశం ఉంటుంది. డబ్బు వసూలు చేసిన వారు కొంత ఎక్కువ వసూలు చేసి, ఎవరికి ఇవ్వాలిని వారికిచ్చి కష్ట పడ్డందుకు అలుపు తీర్చుకునే కార్యక్రమాలు కూడా ఉంటాయి. చివరికి డబ్బు వసూలుకు మాకు ఎటువంటి సంబంధం లేదని డిస్కం కేత్రస్థాయి సిబ్బంది వాస్తవమే అని చెబుతున్నారు. గ్రామీణ వినియోగదారులను రెండవ తరగతి వినియోగదారులుగా పక్షపాత ధోరణితో చూడరాదు. రోడ్లు రవాణా అభివృద్ధి అయినందున, రైతుల సహకారం కూడా దొరుకుతుంది. కావున 24 గంటలలో D.T.R. మార్పిడి చేసే విధంగా కమిషన్ వారు చర్యలు గైకొనాలని ప్రార్థిస్తున్నాం

ఫిర్యాదులున్న తెలియజేయుట కోసం ఏర్పాటు చేయబడింది .

- ii. DTR కారణం గా ఏమైనా విద్యుత్ అంతరాయం ఉన్నచో స్థానిక సిబ్బందికి లేక పై అధికారులకు తెలియచేసినచో వెంటనే చర్యలు తీసుకోని విద్యుత్ సరఫరా పునరుద్ధరణ చేయబడుతుంది.
- iii. అయితే లోపభూయిష్ట DTR కారణంగా సరఫరా అంతరాయాలను వినియోగదారులు టోల్ ఫ్రీ నంబర్: 18004250028 లేదా 1912 ద్వారా తెలియజేయవచ్చు
- iv. అందుబాటులో ఉన్న మొత్తం ఆరోగ్యవంతమైన ట్రాన్స్ఫార్మర్లు :4111 అందుబాటులో ఉన్న మొత్తం రోలింగ్ స్టాక్:10,282.

<p>7</p>	<p>D.T.R. మీటర్ల పెట్టు ఓ గురించి, 2022-23 Tariff Order లో ఇచ్చిన ఆదేశం 18 సంబంధించిన సమాధానం A.R.R. SPDCL నెం. 21లో R.E.C. 93.0 కోట్ల అప్పు కొరకు వినతిపత్రం ఇచ్చాము అని తెలిపారు. NPDCL వారు 378.55 కోట్ల మీటర్లకు రూ.136.16 కోట్ల మీటర్ల నిర్వహణ కొరకు ఖర్చు కాగలదు. ఇది భారమైన విషయము. చర్చించాల్సి ఉంది అని తెలిపారు. టి.ఆర్.లకు మీటర్లు బిగించే బదులు (Dedicated Feeder) వ్యవసాయ సమర్పిత లైన్లకు సబ్-స్టేషన్లోనే మీటర్లను బిగించే ఏర్పాటు చేసినట్లయితే సంఖ్య తగ్గుతుంది కావున ఖర్చు తగ్గే అవకాశం ఉంటుంది. మీటర్లు రక్షణ ఉంటుంది. మెయింటనెన్స్ కూడా తగ్గుతుంది ఫీడర్లకు అవకాశం లేని చోట పేరెంట్ D.T.R. వద్ద కానీ ఇతర అనువైన స్థలంలో కానీ ఏర్పాటు చేయవచ్చునని మా సూచన. ఇట్టి విషయమై డిస్కం వారు మరియు గౌరవ కమిషన్ వారు చొర వతీసుకోవాలని కోరుచున్నాము.</p>	<p>3533 AGL 11KV ఫీడర్లలో, 628No.s ఫీడర్లు వేరు చేయబడ్డాయి. RDSS పథకంలో మొత్తం ఫీడర్ల విభజన కోసం రూ. 1755.14 కోట్ల ప్రతిపాదించబడింది కానీ పథకం ఇంకా మంజూరు కావలసి ఉంది. పథకం మంజూరయ్యాక పనులు చేపడతాం.</p>
<p>8</p>	<p>Toll Free నెంబర్లు 18004253600, 18004250028 గల వాటికి చేస్తే A.E. గారికి తెలిపారా అని ప్రశ్నిస్తున్నారు. Toll Free నెంబర్లు చేస్తే విధిగా Complaint Book చేసుకొని, రిజిస్టర్ నెంబర్ వెంటనే జారీచేసి పని జరిగితేంత వరకు తగిన చర్యలు తీసుకోవాలి. Toll Free నెంబర్లను ప్రచారం చేయాలి. D.T.R. వద్ద Bill Collection Centres ల వద్ద అన్ని డిస్కం ఆఫీస్లో కూడా. వ్రాయించాలి. Toll Free నెంబర్ వారి నుండి సరియైన స్పందన (Response కు సమస్య పరిష్కారం</p>	<p>వినియోగదారులకు TSNPDCL యొక్క టోల్ ఫ్రీ నంబర్లు 18004250028, 1912 కు చేసిన వెంటనే కంప్లెయింట్ రిజిస్టర్ చేసుకొని రిజిస్ట్రేషన్ ID ఇవ్వడం జరుగుతున్నది మరియు కంప్లెయింట్ అయ్యే వరకు ఆ AE గారితో మాట్లాడి సమస్య పరిష్కారం అయ్యాక వినియోగదారుల అభిప్రాయం తీసుకొని కంప్లెయింట్ చేయటం జరుగుతున్నది. టోల్ ఫ్రీ నంబర్లను వినియోగదారులకు అనుకూలంగా, డివిజన్, సర్కిల్, ఈ.ఆర్.ఓ. మరియు పంచాయతీరాజ్ ఆఫీస్ ల ముందు బ్యానర్ల పై వ్రాయించడమైనది. అలాగే కంపెనీ సైట్, మొబైల్ యాప్</p>

	కానట్లయితే Toll Free నెంబర్లు సంబంధించిన ఉన్నతాధికారులు నెంబర్లు కూడా తెలియపరచాలి. Discom వారి ఏకీకృత Toll Free నెంబర్లను ప్రోత్సహించాలి.	మరియు సీసీ లో కూడా పొందుపర్చడం అయినది.
9	Cost of Service Category wise A.R.R. లో చూపించారు. Cost of Service లో ఏ ఏ Component లు లెక్కిస్తారు ఉదా : విద్యుత్ కొనుగోలు, మౌళిక వసతులు ఉదా : విద్యుత్ స్తంభాలు, Conductor, D.T.R.లు, సబ్-స్టేషన్లు లాంటివి ఉంటాయా ఏమి ఏమి ఉంటాయో తెలియజేయగలరు.	Cost of Service Category wise లో సమగ్ర ఆదాయ ఆవశ్యకతలో కలసివున్న డిస్ట్రిబ్యూషన్ వ్యయం (O&M ఛార్జీలు, ROCE, తరుగుదల, స్పెషల్ అప్రోప్రియేషన్, ఆదాయంపై పన్ను), ట్రాన్సిమిషన్ ఛార్జీలు, SLDC ఛార్జీలు, PGCIL ఛార్జీలు, విద్యుత్ కొనుగోళ్ళ వ్యయం, వినియోగదారుల డిపాజిట్ల పై వడ్డీ మరియు సప్లయ్ మార్జిన్ ఉంటాయి. ఈ మొత్తం వ్యయాన్ని (ARR) వినియోగదారులు వాడుకునే లోడ్, వాడుకునే ఎనర్జీ, మరియు వినియోగదారులు రకముని బట్టి Cost of Service Category wise నిర్ణయించటం జరుగుతుంది.
10	Additional Consumption Deposit (A.C.D) లు డిస్కం వారు వసూలు చేస్తున్నారు ఏదో ఒకసారి అట్టి సర్వీస్ పై ఎక్కువ లోడ్ రికార్డు అయినదానిని లెక్కలోకి తీసుకుంటున్నామని తెలిపారు. సర్వీస్ గల ఇంటిలో శుభ, అశుభ సందర్భాలప్పుడు అదనపు వినియోగం అవుతుంది. అటువంటి సందర్భాలలో ముందస్తు అనుమతి తీసుకుంటే మినహాయిస్తామని ఒక ఉన్నతాధికారి తెలిపారు. ఈ విషయం వినియోగదారులకు తెలియదు. అయితే అశుభ సంఘటనలు జరిగినప్పుడు ఇది సాధ్యం కూడా కాదు. కావున ఒక సంవత్సరం వినియోగాన్ని లెక్కలోకి తీసుకుని గతం కంటే ఎక్కువ ఉంటే ఆ నిష్పత్తిలో A. C.D. లు కలెక్టు చేయవలసిందిగా తదనుగుణంగా వినియోగదారులపై	గౌరవనీయమైన విద్యుత్ నియంత్రణ మండలి TSERC రెగ్యులేషన్ నెం.6(2004) ప్రకారం అదనపు సెక్యూరిటీ డిపాజిట్ (ACD) వినియోగదారుడు వాడుకున్న అదనపు లోడును బట్టి (ACD) నిర్ణయించడం జరగదు. వినియోగదారుడు గత సంవత్సరము వినియోగించిన రెండు నెలల సగటు విద్యుత్ వినియోగ యూనిట్లకు సమానంగా సెక్యూరిటీ డిపాజిట్ను విద్యుత్ సంస్థ వద్ద నిల్వ ఉంచాలి. ప్రస్తుత బిల్లింగ్ విధానము ప్రకారంగా వినియోగదారుడు వినియోగించిన నెల తరువాత బిల్లు జారీ చేయడము అవుతున్నది మరియు బిల్లు జారీ చేసిన తరువాత 30 రోజుల లోపు బిల్లు చెల్లించడానికి వెసలు బాటు కలదు అనగా మొత్తం రెండు నెలల తర్వాత మాత్రమే వినియోగదారుడు తాను వినియోగించుకున్న విద్యుత్ కు ఛార్జీలను

	<p>పడుతున్న అదనపు భారాన్ని దృష్టిలో పెట్టుకొని, నిర్ణయం తీసుకోవాల్సిందిగా గౌరవ కమిషన్ వారిని ప్రార్థిస్తున్నాము A.C.D. కట్టిన వారి కాంటాక్ట్ లోడ్ పెంచుతున్నట్లు గా అది బిల్లులో అవుతుందా డిస్కం వారు తెలియజేయగలరు.</p>	<p>డిస్కం కు చెలిస్తున్నాడు:</p> <p>కావున ఒక సంవత్సరంలో విద్యుత్ వినియోగదారుడు వారి సర్వీస్ పై వాస్తవంగా ఉండవలసిన సెక్యూరిటీ డిపాజిట్ ను 2 నెలల సగటు వినియోగ యూనిట్ల ఆధారంగా లెక్కించి నుంచి అంతకు ముందే వారి నూతన సర్వీస్ తీసుకున్నప్పుడు చెల్లించిన డిపాజిట్ ను మరియు అదనపు లోడ్ పెంచినప్పుడు తీసుకున్న సెక్యూరిటీ డిపాజిట్ ను మినహించగా వచ్చిన నికరమొత్తాన్ని అదనపు సెక్యూరిటీ డిపాజిట్ గా (ACD) లెక్కిస్తారు</p> <p>ఇట్టి డిపాజిట్ పై రిజర్వ్ బ్యాంక్ ఆఫ్ ఇండియా నిబంధనల ప్రకారం ప్రతి సంవత్సరం వడ్డీని లెక్కించి నెల బిల్లు లలో సర్దుబాటు చెయ్యడం జరుగుతుంది.</p>
<p>11</p>	<p>O.R.C Agricultural Service కు మెటీరియల్ ధరలు పెరిగాయని, O.R.C. వేలాది రూ.లు. లక్షలాది రూ.లు కట్టమని తెలుపుతున్నారు. అసలు మౌళిక సదుపాయాలైన Polls, కండక్టర్, ఇతరత్రాలు ఎవరు ఏర్పాటు చేయాలి? అది ఎవరి ఆస్తి? వినియోగదారులు డబ్బులు చెల్లించిన మేరకు వినియోగదారునికి, యాజమాన్య హక్కులు ఉంటాయా? తెలియజేయగలరు. మెటీరియల్ ధరలకు వినియోగదారునికి సంబంధం) ఏమిటి? గతంలో ఒక D.D. కడితే సుమారు 3 పోల్సు సరియే సామాను తెచ్చి Install చేసేవారు ధరలు) పెరిగితే, మేము చెల్లించే D.D. సుమారు 6,000 రూ.లను ఆ నిష్పత్తిలో 10 లేక 20 శాతం పెంచాలి. కానీ O.R.C.</p>	<p>వ్యవసాయ కనెక్షన్ల విడుదల కోసం TSNPDCL ద్వారా చేయవలసిన వ్యయంపై వ్యవసాయ అంచనాలను మంజూరు చేసేటప్పుడు సూపరింటెండింగ్ ఇంజనీర్/ఆపరేషన్ లకు ఈ క్రింది సూచనలు జారీ చేయబడ్డాయి.</p> <ol style="list-style-type: none"> 1. అంచనాలో టి లైన్, ఎల్ టి లైన్ మరియు డిటిఆర్ ఉంటే, TSNPDCL ద్వారా భరించాల్సిన వ్యయం ఒక్కో సర్వీసుకు రూ.50,000/- నుండి రూ.70,000/- పెంచబడినది. 2. అంచనాలో కేవలం LT లైన్ మాత్రమే ఉన్నట్లయితే, TSNPDCL ద్వారా భరించాల్సిన వ్యయం ప్రతి సర్వీసుకు రూ.32,000/- నుండి రూ.45,000/- వరకు పెంచబడినది.

	<p>పేరు లక్షలాది రూ.లు రైతు వినియోగదారుల పైన వేయరాదు. గతంలో ఇచ్చినంత మెటీరియల్ ప్రస్తుతము మరియు భవిష్యత్తులో కూడా ఇవ్వాలి.</p> <p>ఇట్టి విషయమై తగిన చర్యలకు ఉపక్రమించవలసిందిగా గౌరవ కమిషన్ వారిని ప్రార్థిస్తున్నాము</p>	<p>3. వాడుకలో ఉన్న డిపార్ట్మెంట్ నిబంధనల ప్రకారం వినియోగదారుడు పికి డెవలప్ మెంట్ ఛార్జీలు రూ.1200/- మరియు రూ.60/- సెక్యూరిటీ డిపాజిట్ ఛార్జీలు చెల్లించాలి.</p> <p>మిగిలిన ORC రూపంలో వినియోగదారుడు భరించాలి మరియు ORC చెల్లించిన తర్వాత డిపార్ట్మెంట్ మెటీరియల్ డిపార్ట్మెంట్ పనిని చేపడుతుంది. పనిని పూర్తి చేసిన తర్వాత మెటీరియల్ పై కాబోయే వినియోగదారుకు హక్కు ఉండదు.</p> <p>కేవలం రేట్ల సేకరణకు అనుగుణంగా మెటీరియల్ రేట్లు ఎప్పటికప్పుడు మారుతూ ఉంటాయి.</p>
<p>12</p>	<p>Over Dues Over 50,000/- Over 6 నెలలు : TS SPDCL. వారికి 6 నెలలకు 50 వేలు పైబడిన L.T. మరియు H.T. బాకీలు మొత్తం 8 వేల 717 కోట్ల 98 లక్షల 38 వేలుగా నెం. 286 ఫార్మాట్ నెం. 9 (ఎ) లో చూపించారు. ఇందులో ఎక్కువ మొత్తం Category H.T.-IV Irrigation కు సంబంధించినది. 4 వేల 869 కోట్ల 90 లక్షల 7 వేలుగా మరియు H.T.-1 Industry బాకీ 3 వేల 437 కోట్ల 47 లక్షల 32 వేలుగా చూపించారు. H.T.-IV మరియు H.T. 1 మొత్తం బాకీ కలిపితే 8 వేల 307 కోట్ల 38 లక్షల 3 వేలుగా ఉంది. త్తం బాకీ అయిన 8 వేల 717 కోట్ల 98 లక్షల 38 వేల నుండి తీసివేయగా ఇతర అన్ని Category బాకీ మొత్తం 410 కోట్ల 60 లక్షల 35 వేలు మాత్రమే. ఇందులో అధిక మొత్తం బాకీ రాష్ట్ర ప్రభుత్వం చెల్లించాల్సింది తరువాత పరిశ్రమల వారు</p>	<p>(a) H.T IV(A) Irrigation Category నుండి రూ.5131.7 కోట్లు బకాయిలు ప్రభుత్వ ఆధ్వర్యంలో నడిచే Lift Irrigation Scheme సర్వీసులు H.T IV(A) మరియు రక్షిత మంచి నీటి పథకాల సర్వీసుల HT. IV (B) - CPWS Schemes నుండి రావలసి ఉన్నది. ఈ బకాయిల వసూలుకు TSNPDCL నుండి పై రెండు శాఖాధిపతులకు (HOD) తరుచు వారి దృష్టికి ఉత్తరాల ద్వారా మరియు D.O Letters ద్వారా బకాయిలు చెల్లించమని కోరడం అయినది. ఈ రెండు క్యాటగిరి సర్వీసులు H.T IV (A) & IV (B) ప్రజలకు సాగునీరు మరియు రక్షిత త్రాగునీటిని అందించే పథకాలకు సంబంధించినవి కావడం వలన ఇట్టి సర్వీసులు Disconnect చేసినట్లయితే ప్రజలు తీవ్ర అసౌకర్యానికి మరియు ఇబ్బందులకు గురి అవుతారు. కాబట్టి ఈ సర్వీసుల శాఖాధిపతులకు బకాయిలు</p>

చెల్లించాలి. మరి రెండు వర్గాల వారు కూడా డిస్కంట్లకు అందుబాటులో ఉండేవారే. ఎందుకు వసూలు చేయలేక పోతున్నారో డిస్కంట్ వారు తెలియజేయాలి. సత్వరమే ఇట్టి బాకీలు వసూలు అయ్యేవిధంగా చట్టపరమైన చర్యలు చేపట్టాలి తగిన చర్యలు తీసుకుంటామని గౌరవ కమిషన్ వారిని ప్రార్థిస్తున్నాము

NPDCL H.T. IV Irrigation 5,131. 71 కోట్లు మరియు H.T.-1 పరిశ్రమల వారికి 1,071,53 కోట్లు గా ఉన్నది.

SPDCL – Rs. 4869.907 Crores + NPDCL Rs. 5131.710 Crores

= Total Rs. 10,001.617 Crores

మొత్తం అమౌంట్ : 10 వేల కోట్ల పైగా రెండు డిస్కంట్లకు కలిపి HT-IV క్యాటగిరీకి రాష్ట్ర ప్రభుత్వము చెల్లించాల్సి ఉంది.

H.T.-I Industrial

SPDCL Rs. 3,437.47 Crores + NPDCL Rs. 1,071.53 Crores

= Total 4,509.00 Crores

మొత్తం అమౌంట్ : 4 వేల 5 వందల కోట్ల పైగా రెండు డిస్కంట్లకు కలిపి HT.-I క్యాటగిరీకి పరిశ్రమలు చెల్లించాల్సి ఉంది.

రాష్ట్ర ప్రభుత్వము, పరిశ్రమల వారు కలిపి సుమారుగా 15 వేల కోట్ల రూపాయలు రెండు డిస్కంట్లకు కలిపి బాకీ కలిగి ఉన్నారు. సామాన్య వినియోగదారులు ఒక నెల బిల్లు నుడ్యూ డేట్ తరువాత వెంటనే విద్యుత్

చెల్లించమని కోరడం జరిగింది.

(b) H.T-I పరిశ్రమల వారిని రూ.1071.53 కోట్లు TSNPDCL కు రావాల్సి ఉన్నది. ఈ మొత్తం బకాయి వివరాలు క్రింద ఇవ్వడం జరిగినది.

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|------|--|----------------------------|
| i) | ప్రభుత్వం ఆధ్వర్యంలో నడిచే పురపాలక సంఘాల బకాయిలు | రూ 115.81 కోట్లు |
| ii) | HMWS & SSB Services | రూ 591.13 కోట్లు. |
| iii) | కోర్టు కేసులు (Supreme Court and High Court) | |
| | వున్న సర్వీసుల బకాయిలు | రూ 273.54 కోట్లు |
| iv) | Other Disconnected Services | రూ 41.23 కోట్లు |
| iv) | ఇతర ప్రభుత్వ సర్వీసుల బకాయిలు | రూ 49.82 కోట్లు |
| | Total | రూ 1071.53 కోట్లు |

క్రమ సంఖ్య i) లో ఉదహరించిన బకాయిలు రూ|| 115.810 కోట్లు పురపాలక సంఘాల ఆధ్వర్యంలో నగర ప్రజలకు నీటి సరఫరా చేసే సర్వీసుల పై ఉన్నవి. ఈ బకాయిల చెల్లింపు కొరకు సంబంధిత మున్సిపల్ కమిషనర్ లకి మరియు డైరెక్టర్, మున్సిపల్ అడ్మినిస్ట్రేషన్ వారికి D.O Letters ద్వారా కోరడమైనది.

	<p>సరఫరాను నిలిపి వేస్తారు.</p>	<p>క్రమ సంఖ్య. ii)లో చెప్పినట్లు రూ॥ 591.13 కోట్ల బకాయిలు HMWS & SB ఆధ్వర్యంలో హైదరాబాద్ నగర ప్రజలకు నీటి సరఫరా చేసే బోర్డుకి సంబంధించినవి. ఈ బకాయిల చెల్లింపు కోసం సంబంధిత మేనేజింగ్ డైరెక్టర్, HMWS & SB, హైదరాబాద్ వారికి D.O Letter ద్వారా కోరడమైనది.</p> <p>క్రమ సంఖ్య iii)లో చెప్పినట్లు రూ॥ 273.54 కోట్ల బకాయిలు వివిధ కోర్టులలో (సుప్రీం కోర్టు, హైకోర్టు, NCLT మొదలైనవి) పెండింగ్ కేసులుగా, H.T.. కేటగిరీ-I సర్వీసుల పై ఉన్నవి. ఈ సర్వీస్ ల బకాయిలు కోర్టులలో పెండింగ్ ఉన్నందున ఈ సర్వీసుల కనెక్ట్ చేయడం సాధ్యంకాదు. అన్ని కోర్టులలో కూడా TSNPDCL సరైన కౌంటర్ అఫిడవిట్ దాఖలు (File) చెయ్యడం జరిగింది. ఈ సర్వీసుల పై కోర్టు తీర్పు ఇచ్చిన తర్వాత తగిన చర్యలు తీసుకోగలము అని తెలపడమైనది.</p> <p>క్రమ సంఖ్య iv) లో చెప్పినట్లు రూ॥ 41.23 కోట్ల బకాయిలు ఉన్న ఈ సర్వీసులను ఇది వరకే (already) కనెక్ట్ చెయ్యడం జరిగింది. ఈ సర్వీసుల పై బకాయిలు వసూలు ఈ సర్వీసులను Revenue Recovery Act (RR Act) కింద రివ్యూ చెయ్యడం జరిగింది.</p> <p>క్రమ సంఖ్య v) లో చెప్పినట్లు రూ॥ 49.82 కోట్లు ఇతర ప్రభుత్వ కార్యాలయాలకు సంబంధించినవి. వీటి చెల్లింపు కొరకు సంబంధిత శాఖాధిపతులకు D.O Letters ద్వారా కోరడమైనది.</p>
13	<p>అగ్రికల్చరల్ సర్వీసులకు సంబంధించి రాష్ట్రప్రభుత్వం రైతాంగానికి ప్రేమతో, బాధ్యతతో చెల్లించే బిల్లు ఒక సర్వీసుకు ఎంత డిస్కం వారికి</p>	<p>అగ్రికల్చరల్ సర్వీసులకు సంబంధించి రాష్ట్రప్రభుత్వం రైతాంగానికి రాష్ట్ర టారిఫ్ ఆర్డర్ ఆర్థిక సంవత్సరం 2022-23 ప్రకారం రూ॥ 6,736 కోట్లు టారిఫ్</p>

	<p>చెల్లిస్తున్నారు తెలియజేయాలి. రైతాంగం బిల్లు రాష్ట్ర ప్రభుత్వం చెల్లించేది. మాకు వెల్లడించినట్లయితే మేము మా ముఖ్యమంత్రి గారిపై మరియు ప్రభుత్వము వారిపై మరింత గౌరవంతో, కృతజ్ఞతా భావంతో ఉంటామని తెలియజేస్తున్నాము.</p>	<p>సబ్సిడీ క్రింద ఇవ్వడానికి ఒప్పుకున్నది. అందులో TSNPDCL రూ॥ 5574 కోట్లు, TSSPDCL కు రూ॥ 872 కోట్లు మరియు RESCO సిరిసిల్లా కు రూ॥ 289 కోట్లు ఇవ్వడం జరుగుతుంది. TSNPDCL పరిధిలోని అగ్రికల్చర్ సర్వీసులకు వాడుకునే విద్యుత్ కు సంబంధించి ఒక యూనిట్ రూ॥ 7.70 లను టారిఫ్ ఆర్డర్ 2022-23 ప్రకారం రాష్ట్ర ప్రభుత్వం ఇస్తున్నది టారిఫ్ ఆర్డర్ 2022-23 ప్రకారం ఒక సర్వీసుకు సంవత్సరానికి సుమారుగా రూ. 41,882 లను (HP రూ.8.273) చొప్పున రాష్ట్ర ప్రభుత్వం చెలిస్తున్నది.</p>
<p>14</p>	<p>SPDCL, A.R.R. నెం. 86లో Loose Spans 1 లక్షకు పైగా (Bent) వంగిన Polls సుమారు 55 వేలు HG Fuse 75 వేలకు పైగా, L.T. Fuse 51 వేలకు పైగా Fencing 14 వేలకు పైగా DT.R. Plinth సరిపోయేంత ఎత్తు లేనివి 9500 పైగా ఉన్నానని తెలుపుతూ పై Action Plan ప్రకటించారు. మొత్తం ఎప్పటి వరకు పూర్తిచేస్తారు NPDCL, A.R.R. నెం: 85, 86 లో చాలా పనులు చేశామని తెలిపారు. సుమారు 2 లక్షల పైగా స్తంభాలు, 1578 ట్రాన్స్మిస్యోన్ ఫింట్ (గడ్డెలు) పునర్ నిర్మాణం చేశామని, Loose Spans 86 వేలకు పైగా సరిచేశామని తెలిపారు.</p> <p>ఇట్టి పనులు జరిగినట్లయితే అభినందనీయమే. ఇంకా ఏమైనా మిగిలినవి కూడా గుర్తించి, సంఖ్యను ప్రకటించి, పనులు పూర్తిచేయాలని కోరుతున్నాము.</p>	<p>లూజ్ లైన్లు, బెంట్ , డిటిఆర్ ఫింట్ల ఎత్తు పెరగడం వంటి లోపాలను గుర్తించేందుకు ఫీల్డ్ ఆఫీసర్లు గ్రామాన్ని దత్తత తీసుకోవడానికి TSNPDCL కొత్త కార్యక్రమాన్ని ప్రారంభించింది. అన్ని గ్రామాల్లో పనులు పూర్తి చేసి లోపాలను సరిదిద్దడంతోపాటు అన్ని గ్రామాలు, పట్టణాలు పూర్తయ్యే వరకు ఇదే కార్యక్రమాన్ని కొనసాగించడం జరుగుతుంది. ఇది నిరంతర ప్రక్రియ పనికీరాని విద్యుత్ పరికరాలను మార్చి క్రొత్తవి వేయటం జరుగుతుంది.</p>

	<p>దీనిపై సత్వరమే చర్యలు తీసుకోవాలి. ముఖ్యంగా Loose Spam వల్ల అట్టి (Wires Conductors Tractors పై ఉన్న గడ్డికి తగిలి, నెత్తిన మంచం ఎత్తుకు వారికి కూడా గతంలో Conductor తగిలి చెందడం జరిగింది. Plinth తక్కువ ఎత్తులో ఉన్న కారణంగా పశువులు, మనుషులు దుర్మరణం చెందిన, చెందుతున్న సంఘటనలు ఉన్నాయి.</p>	
15	<p>C.G.R.F. కు వచ్చిన ఫిర్యాదులపై C.G.R.F. వారు ఇచ్చిన ఆర్డర్ నిర్ణీత సమయంలో అమలు చేయడం లేదు. C.G.R.F. వారు ఇచ్చిన ఆర్డర్ పైనే C.G.M. Operations అధికారి పర్యవేక్షణ ఉండాలి. వినియోగదారుని నుండి పనిపూర్తి అయి సంతృప్తి చెందినట్లు గానూ పూర్వకంగా తీసుకొని, C.G.R.F. కు పంపి ఏర్పాటు చేయాలి. ప్రతి మూడు మాసాలకు ఒకసారి C.M.D. గారు సమీక్ష చేయాలని కోరుతున్నాము.</p>	<p>C.G.R.F. కు వచ్చిన ఫిర్యాదులపై C.G.R.F. వారు ఇచ్చిన ఆర్డర్ నిర్ణీత సమయంలో అమలు చేయడానికి C.G.Ms. Operation/TSNPDCL వారి పర్యవేక్షణలో ఉన్నది. వినియోగదారుని నుండి పనిపూర్తి అయి సంతృప్తి చెందినట్లు గానూ పూర్వకంగా తీసుకొని, C.G.R.F. కు పంపి ఏర్పాటును పరిశీలిస్తాము ప్రతి త్రైమాసముకు ఒకసారి C.M.D. గారు సమీక్ష చేయడము జరుగుతున్నది.</p>
16	<p>SPDCL Hyderabad South Circle లో మొత్తం వినియోగం ఎంత? ఎన్ని యూనిట్లు? ఎంత పర్సంటేజి కలెక్షన్ వస్తుందో తెలియజేయగలరు. తక్కువ బిల్లు రావడానికి కారణాలు తెలపగలరు. SPDCL వారు మొత్తం బిల్లు రాబట్టడానికి తీసుకుంటున్న చర్యలు ఏమిటి?</p>	-
17	<p>వ్యవసాయ సర్వీసుల వద్ద రైతులు తమ పశువులకు నీరు అగ్రికల్చర్ సర్వీసును కమర్షియల్ మారుస్తామని డిస్కంమ్ అధికారులు</p>	

<p>తెలుపుతున్నారు. కానీ ఎమ్. ఆర్. ఎయిర్పోర్టులో అడ్వర్టైజ్ మెంట్ క్యాటగిరీని విస్మరించారు. ఎల్.టి.లో అడ్వర్టైజ్మెంట్ క్యాటగిరీకి యూనిట్లూ రూ.13 గా ఉన్నది. టి.లో ఈ క్యాటగిరీ లేదు. ఎక్కువకు ఎక్కువ రూ.8 లకు మించి లేదు. ఇక్కడ క్యాటగిరీ అతిక్రమణ చేసినా లెక్కలోకి తీసుకోరు. హైదరాబాద్ సర్కిల్ అయితే అసలు సర్వీసులుండి బిల్లు చెల్లించకపోయినా, సర్వీసులు లేకుండా విద్యుత్ వినియోగం చేసుకున్నా, బిల్లులను సక్రమంగా వసూలు చేయరు. అమ్మత ఆహారానికి ఆలవాలమైన పాడి పంట, పశువులపైన మాత్రం అధికారులు క్రౌర్యం చూపిస్తారు. వ్యవసాయంలో పాడిపంట రెండూ భాగమే అని గుర్తించి, రైతు స్థాయిలో పశువుల పెంపకాన్ని వ్యవసాయంగానే పరిగణించాలని గౌరవ కమిషన్ వారిని ప్రార్థిస్తున్నాము</p>	<p>లైసెన్స్ పరిధిలో లేని అంశం.</p>
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Replies to the Objections/Suggestions raised on ARR & FPT including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 and Power Purchase true-up from FY 2016-17 to FY 2022-23 (Prov) for Retail Supply Business by Sri GRK Prasad, Executive Director, Corporate Office, Silicon House. No. 8-3-318/1, Plot No. 78, Road No. 14, Banjara Hills, Hyderabad-500034.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	Our objections against the proposed Grid Support Charges are set out below for this Hon'ble Commission's kind consideration and disposal:	
1	<p>THE IMPACT OF THE ELECTRICITY ACT, 2003:</p> <p>In 2003, the Electricity Act, 2003 ("Act") came into force. The Act brought in substantial changes to the previous regime, including the establishment of State Commissions, delicensing of Generation, unbundling of transmission and distribution, specification of tariffs and charges, crystallized the scheme of Open Access, brought in procedures and standards to enforce discipline, etc. However, it left the Commissions established by States under earlier State enactments (such as the AP Electricity Reform Act, 1998) untouched and treated them to be Commissions established under the Act, essentially conferring them with powers under both Acts, in as much as the State enactments were not in derogation to the Act.</p>	No Comments
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 Comments
	<p>No jurisdiction to Propose or Levy GSC:</p> <p>2.0 Earlier TS DISCOMS proposed to levy the grid support charges on captive generating plants considering captive load burden on Grid . But we surprise to note that now the DISCOMS proposed to levy such charges on all generating plants including Independent power generating plants and Merchant power generating plants without</p>	All the generators who are connected to the grid also enjoy the same benefits as the Captive Power Plants. In this regard, the Discom has proposed Grid Support Charges for all the Generators except those who have PPAs with the

	<p>explaining any reason/basis for levy of such charges.</p> <p>2.1 The IPPs and Merchant power generating plants are meant for generate and export entire power to grid and accordingly always supportive to grid but never opt grid support to run the plant.</p>	Discoms.
3	<p>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.</p>	<p>The grid support charges are being proposed by the Distribution Licensee for consumers who are having parallel operation of all the generators with grid except those who have PPAs with the Discoms. The Distribution Licensee's 132kV & above level HT consumers are not paying Transmission charges & SLDC charges to respective entities even though connected to 132kV & above level. These consumers are paying retail supply Tariffs as approved by the Hon'ble State Commission from time to time which is inclusive of all costs (Incl SLDC & Transmission Charges).</p>
4	<p>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.</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 2023-24 are well within the provisions of Act.</p>
5	<p>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</p>	<p>However, the full Bench of Tribunal in Appeal No. 120 of 2009 relating to Parallel Operation Charges(Grid Support</p>

	relevant to IPPs and Merchant Power generating plants. 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.	Charges) in Chhattisgarh 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. The licensee has not denied CPPs access to grid or availing of parallel operation benefits. It is clarified that the captive generators who intended to use and benefit from parallel operation need to pay the Grid Support charges, in line with the justifications mentioned in the previous sections.
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 I 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:	No Comments
7	The Applicant Discoms have proposed Grid Support Charges for all generators, including captive, cogeneration, merchant power plants/IPP, rooftop power plants etc., which is completely against the reasoning of GSC in the first place.	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. <ul style="list-style-type: none"> • 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. • 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.

- 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

		<p>grid acts as the supporting system for the CPPs for its successful operation in terms of electrical performances. However, the grid support being an ancillary service extended by the licensee to the consumers, it has to be charged to the consumers who utilize the grid support.</p> <p>The full Bench of Tribunal in Appeal No. 120 of 2009 relating to Parallel Operation Charges (Grid Support Charges) in Chhattisgarh by Order dated 18.02.2011 stated that <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. Hence, the levy of grid support charges is well within the provisions.</p> <p>The grid support charges are not for drawl of power from the Distribution Licensee, but for utilization of parallel operation benefits by captive generators.</p> <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</p>
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		<p>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 2023-24 are well within the provisions of Act.</p> <p>The above benefits are elaborated by TS Discoms during the GCC meetings with the stakeholders.</p>
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.	<p>The proposed grid support charges of 50% of 475 per KVA per month during the FY 2022-23 RST filings, was supposed to 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).</p> <p>Considering the interest of all stakeholders involved, the licensee has revised its GSC proposal as :</p> <ul style="list-style-type: none"> ☐ The parallel operation/grid support charges are to be applied to the total installed capacity of the generators connected to the Grid ☐ Conventional generators shall pay Rs.50 per kW per month ☐ 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. ☐ Rooftop solar plants under net metering/gross metering policy shall pay Rs.15 per kW per month.
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.	
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.	

		☐ 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.
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.	The detailed responses are already given in above Section 3 to 6
13	There is no provision in the statute that empowers the DISCOMS to levy Grid Support Charges on the Merchant power plants	The detailed responses are already given in above Section 3 to 6
	<p>PRAYER:</p> <p>That, in view of the above, we pray that the Hon' ble Commission may be graciously pleased to</p> <ol style="list-style-type: none"> 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 the Electricity Act, 2003 and the National Electricity Policy, 2005 to provide connectivity to the generating stations 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 To hold the levy till the third-party analysis is completed to the satisfaction of the Hon 'ble TSERC; 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 Consider our foregoing objections, grant us a personal hearing 	<p>The detailed responses for levy of Grid Support Charges by TS Discoms are already given in above sections.</p> <p>Hon'ble TSERC has entrusted the responsibility of discussing and proposing the Grid Support Charges/ Parallel Operation Charges to the TS Grid Co-ordination Committee (GCC).</p> <p>The GCC has conducted meetings with all the stakeholders on different occasions to gather their views on the levy of GSC/POC. The detailed objections/ suggestions from the stakeholders received during these meetings were already addressed orally and in written by TS Discoms.</p> <p>Some of the stakeholders like CESS Siricilla, M/s PTC India, Mytrah Vayu (Godavari) Ltd., and representative of STU & person nominated by Hon'ble TSERC under clause 5.3(n) – Chief Engineer/ Transmission have expressed that they are in line with the views of TS Discoms and that the levy of</p>

	<p>and grant leave to adduce further evidential data in our support at the time of hearing;</p> <p>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.</p>	<p>Grid Support Charges is justified.</p> <p>Hence, TS Discoms request Hon'ble Commission to approve the proposal for levy of Grid Support Charges. TS Discoms would abide by the directions of Hon'ble Commission in this regard.</p>
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Replies to the Objections/Suggestions raised on ARR & FPT including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 and Power Purchase true-up from FY 2016-17 to FY 2022-23 (Prov) for Retail Supply Business by Sri Jogendra Behera, Vice President – Market Design & Economics, IEX, Plot No.C-001/A/1, 9th Floor Max Towers, Sector 16B Noida, Gautam Buddha Nagar, Uttar Pradesh – 201301.

S.No	Summary of Objections / Suggestions	Response of the Licensee
1	<p>Computation of CSS</p> <p>A. Restricting CSS to 20% of ABR</p> <p>i. The Petitioner in the present proposal has requested the Hon'ble Commission not to restrict the CSS to 20% of tariff payable by the consumer as the tariffs are not within +/- 20% of Average Cost of supply.</p> <p><i>"8.2.3 The "Consultation Paper on Issues pertaining to Open Access, Aug'17" issued by MoP, Gol highlighted the issue of limiting the CSS to 20% of tariff applicable to the consumer category which is presented below:</i></p> <p><i>"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".</i></p> <p><i>8.2.4. Hence, the licensee humbly requests the Hon'ble Commission not to restrict the Cross-Subsidy Surcharge at 20% of tariff payable by the consumer as the tariffs are not within +/-20% Average Cost of Supply."</i></p>	<p>TS Discoms shall abide by the directions of the Hon'ble Commission in this regard.</p>

	<p>ii. It is submitted in this regard that CSS is to be restricted to 20% of the Average Billing Rate (ABR) in terms of clause 8.5 of the Tariff Policy. Further, from para 8.3 of the Tariff Policy 2016, it is evident that the cross subsidies in the tariff need to be brought within +-20% of the Average Cost of Supply (ACoS). Apparently, the tariff policy provided a much higher ceiling of 20% of ABR in para 8.5.1 in the determination of the CSS, while it should be capped to 20% of the ACoS itself. <u>Infact, the Hon'ble Ministry of Power has amended the Electricity Rules, 2005, and notified the Electricity (Amendment) Rules, 2022 on 29.12.2022. The Ministry in the notified Rules has capped the surcharge on open access at 20% of the Average Cost of Supply. Since the tariffs are being set with reference to the ACoS, the Hon'ble Commission is requested to cap the surcharge on open access with reference to the ACoS, in line with the Electricity (Amendment) Rules, 2022.</u></p>	
2	<p>Short term procurement/sale through IEX</p> <p>A. Power Purchase from Market/ Short-Term</p> <p>(i) It is to bring to the kind notice of the Hon'ble Commission that the Distribution Licensees now have the option to trade power at our platform for delivery of conventional and non- conventional power upto 90 days of trade.</p> <p>(ii) The Hon'ble CERC vide Order dated 7th June 2022 allowed IEX to trade power on its platform for delivery upto next 90 days. These contracts allows the participants to contract power sale or purchase for the near future at competitive prices. IEX introduced 4 products under this segment namely, Daily Contracts, Weekly Contracts, Monthly Contracts and Any Day Single</p>	<p>TS Discoms make note of the suggestions provided bythe objector in the context of long duration contracts inthe IEX.</p> <p>Telangana Discoms have a dedicated wing (TelanganaState Power Coordination Committee) to focus on all thepower purchase related matters of the Discoms.Under the purview of TSPCC, TS Discoms will explore the option of such long duration contracts in the IEX.</p> <p>TS Discoms shall abide by the directions of the Hon'ble Commission, if any in this regard.</p>

	<p>Sided Contracts (Reverse Auction).</p> <p>(iii) We request the Hon'ble Commission to consider and approve the products available in the short term market for optimising power purchase costs through sale of surplus power and power purchase to meet the deficit requirements of the Discoms.</p>	
3	<p>Short term procurement/sale through IEX</p> <p>B. Renewable Energy and REC trade at Market</p> <p>(i) The Hon'ble CERC has recently notified REC Regulations 2022 wherein the energy sold by RE capacity registered under REC mechanism in any conventional market (DAM/RTM/ TAM) at Power Exchange shall be eligible for issuance of RECs and in case the energy is sold in the Green Market (for fulfilment of RPO by the buyers) by such RE capacity then no such RECs will be issued against such energy sold in the Green Markets at Power Exchanges. Additionally, the Discoms can seek RECs for their RE consumption in excess of the targets. Therefore, as against the earlier practice, the new regulations provide complete flexibility in so far as the fulfilment of RPO and issuance of REC is concerned.</p> <p>(ii) In view of the above, the Hon'ble Commission may allow an explicit provision to the Discoms for sale and purchase of RE power through conventional/ green market. The Hon'ble Commission may also allow the Discoms to take benefit of the flexibility of the RE market at the power exchange for sale of surplus RE power (if any) beyond the RPO target.</p>	<p>TS Discoms make note of the suggestions provided by the objector in the context of purchase/sale of RE in power exchange.</p> <p>Telangana Discoms have a dedicated wing (Telangana State Power Coordination Committee) to focus on all the power purchase related matters of the Discoms. Under the purview of TSPCC, TS Discoms have been utilizing the GDAM and GTAM products of IEX, for sale or purchase of green power.</p> <p>TS Discoms shall abide by the directions of the Hon'ble Commission, if any in this regard.</p>
4	<p>Short term procurement/sale through IEX</p> <p>C. Alignment of RPO Regulations with MOP trajectory dated 22.07.2022</p>	<p>Under the purview of the Hon'ble Commission.</p> <p>TS Discoms shall abide by the directions of the Hon'ble</p>

<p>It is submitted that the current RPO trajectory followed in the state is governed under the TSERC Renewable Power Purchase Obligation (Compliance by Purchase of Renewable Energy/Renewable Energy Certificates) Regulation, 2022 notified by the Hon'ble Commission on 01.04.2022. Thereafter, the Ministry of Power issued revised trajectory allowing complete fungibility of solar and wind power vide notification dated 22.07.2022. The REC Regulations 2022 issued by the Hon'ble CERC have also introduced a single REC with technology based multiplier. Since the current RE market at the Power Exchange as well the REC market is undergoing transition in alignment with the above significant changes, we request the Hon'ble Commission to amend the RPO regulations to consider the trajectory notified by the Ministry of Power on 22.07.2022.</p>	<p>Commission, if any in this regard.</p>
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Replies to the Objections/Suggestions raised on Power Purchase true-up from FY 2016-17 to FY 2022-23 (Prov) for Retail Supply Business by Sri R.K. Agarwal, Chairman, Surya Towers, 1st Floor, Sardar Patel Road, Secunderabad-500003.

S.No.	Summary of Objections / Suggestions	Response of the Licensee																																																															
1	<p>ABSENCE OF CONSOLIDATED WORKING EXCEL MODEL:</p> <p>The Licensees have not provided the consolidated working excel model along with the Power Purchase Tariff Petitions for FY 2016-17 to FY 2022-23, the absence of which, hinders the process of stakeholder commentary as well as prudence check process of the Hon'ble Commission.</p>	<p>TS Discoms along with the Power Purchase true up Petitions have submitted Annexures which details the station wise approved and actual power purchase cost. As part of the Additional Information requested by the Hon'ble Commission, TS Discoms have submitted the working models for year wise Power Purchase True-up calculations to the Hon'ble Commission</p>																																																															
2	<p>POWER PURCHASE TRUE UP CLAIMED BY TELANGANA DISCOMS FOR FY 2016-17 TO FY 2022-23:</p> <p>i) The TSSPDCL and TSNPDCL has projected a True up amount of Rs. 9,060.80 Crores and Rs. 2,954.47 Crores respectively for the period from FY 2016-17 to FY 2022-23. The Power Purchase True up Claim along with its treatment proposed by the TSSPDCL and TSNPDCL is provided in the table below:</p> <p>TRUE UP CLAIMED BY PETITIONERS FOR FY 2016-17 TO FY 2022-23</p> <p align="right">(Rs.Crores)</p> <table border="1" data-bbox="205 1023 1241 1242"> <thead> <tr> <th>TSSPDCL</th> <th>FY 17</th> <th>FY 18</th> <th>FY 19</th> <th>FY 20</th> <th>FY 21</th> <th>FY 22</th> <th>FY 23</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>PP True up/ (True Down)</td> <td>1,588.32</td> <td>936.04</td> <td>3,799.05</td> <td>3,900.32</td> <td>3,230.80</td> <td>6,372.00</td> <td>1,270.39</td> <td>21,096.92</td> </tr> <tr> <td>Additional Support by GoTS</td> <td>1,583.83</td> <td>908.79</td> <td>1,680.00</td> <td>1,400.00</td> <td>-</td> <td>-</td> <td>-</td> <td>5,572.62</td> </tr> <tr> <td>Loss Funding</td> <td>235.01</td> <td>392.48</td> <td>1,241.82</td> <td>2,470.12</td> <td>2,124.00</td> <td>-</td> <td>-</td> <td>6,463.43</td> </tr> <tr> <td>Net True Up/(True Down)</td> <td>-230.52</td> <td>-365.23</td> <td>877.23</td> <td>30.20</td> <td>1,106.80</td> <td>6,372.00</td> <td>1,270.39</td> <td>9,060.87</td> </tr> </tbody> </table> <table border="1" data-bbox="205 1279 1241 1367"> <thead> <tr> <th>TSNPDCL</th> <th>FY 17</th> <th>FY 18</th> <th>FY 19</th> <th>FY 20</th> <th>FY 21</th> <th>FY 22</th> <th>FY 23</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	TSSPDCL	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22	FY 23	Total	PP True up/ (True Down)	1,588.32	936.04	3,799.05	3,900.32	3,230.80	6,372.00	1,270.39	21,096.92	Additional Support by GoTS	1,583.83	908.79	1,680.00	1,400.00	-	-	-	5,572.62	Loss Funding	235.01	392.48	1,241.82	2,470.12	2,124.00	-	-	6,463.43	Net True Up/(True Down)	-230.52	-365.23	877.23	30.20	1,106.80	6,372.00	1,270.39	9,060.87	TSNPDCL	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22	FY 23	Total										<p>No comments</p>
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	Loss Funding	75.42	156.05	762.86	558.15	1,220.18	-	-	2,772.66																																														
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	<p>ii) The Objections in respect of the True up claim made by the Petitioners from FY 2016-17 to FY 2022-23 are summarised below:</p>																																																						
3	NON-ADHERENCE TO STATUTORY TIMELINES FOR ARR FILING AS PER REGULATIONS FOR FY2019-20, FY2020-21 AND FY2021-22 BY TELANGANA DISCOMS:									For FY 2018-19, TSSPDCL on behalf of both the Discoms had requested the Hon'ble Commission for additional time for submission of ARR citing the reasons for the same and the Hon'ble Commission vide Lr.No.S/R.O-1/4/R.O.1/D.No.723 Dated:05.12.2017 condoned the delay in filing the ARR for FY 2018-19.																																													
	Financial Year	Timeline for ARR Filing as per Regulations	Application filed for Condonation of Delay	Date of Actual ARR filed by TS Discoms	Reason submitted for non-adherence to statutory timelines																																																		

2018-19	By 30.11.2017	N/A	ARR Petition on 15.12.2017 Tariff Proposals on 21.12.2017	N/A	<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"> • Enforcement of Model Code of Conduct in the State of Telangana in view of elections for Telangana Assembly. • 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. • Enforcement of Model Code of Conduct in the State of Telangana from 10.03.2019 till 23.05.2019 (Lok Sabha election). • Pending information from I&CAD department on Lift Irrigation (LI) schemes. • 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. • Issuance of model code of conduct for the Municipal elections from 23.12.2019 to 25.01.2020 • Further extension in view of preparation of tariff proposals in accordance to the MoP recommendations on Tariff Rationalisation process. • 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. • Enforcement of Model Code of Conduct from 17th Nov 2020 to 4th Dec 2020 in view of GHMC elections. • 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.
2019-20	By 30.11.2018	I.A. No.03 of 2019 filed in O.P. No. 21 & 22 of 2017	31.03.2021*	<p>Relevant extracts of Commission's Interim Order dt. 06.11.2019 produced herein:</p> <p><i>"Whereas TSDISCOMs have filed petition for extension of time for filing of ARR & Tariff proposals along with additional surcharge and cross subsidy surcharge for FY 2019-20 for retail supply business and ARR & Tariff proposals for distribution business for 4th MYT control period (FY 2019-20 to FY 2023-24) by 31.03.2019, in view of certain difficulties faced by the Discoms."</i></p>	
Financial Year	Timeline for ARR Filing as per Regulations	Application filed for Condonation of Delay	Date of Actual ARR filed by TS Discoms	Reason submitted for non-adherence to statutory timelines	

					<p><i>"The licensee humbly submits before the Hon'ble Commission that the licensee is in the process of finalizing the ARR, tariff proposals, cross subsidy surcharge and additional surcharge proposals for FY 201920". (Para 2)</i></p>	<p>However, ARR for FY 2019-20, FY 2020-21, FY 2021-22 were submitted before the Hon'ble Commission 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>As also pointed out by the Objector, TS Discoms have been seeking timely extension on tariff filing from the Hon'ble Commission on the grounds mentioned above.</p> <p>In view of the above reasons, TS Discoms request the Hon'ble Commission to consider the True-up Petitions filed by them.</p>
2020-21	By 30.11.2019	I.A. No.08 of 2020 filed in O.P. No. 21 & 22 of 2017, filed on 29.02.2020.	31.03.2021*	<p>Relevant extracts of Commission's Interim Order dt. 20.03.2020 produced herein:</p> <p>"Whereas, TSDISCOMs have filed miscellaneous petition on 29.02.2020 seeking extension of for filing of ARR & tariff proposals, cross subsidy surcharge and additional surcharge for FY 2020 – 21 for retail supply business till 31.03.2020 as the finalisation of lift irrigation demand projections and rationalisation of tariffs is in progress which finalisation is very crucial in submission of for and</p>		

				ARR & tariff proposals for FY 2020–21. The licensee submits that the licensee is in the process of finalising the ARR, tariff proposals, cross subsidy surcharge and additional surcharge proposals for retail supply business to FY 2020 – 21”.	
202 1- 2022	By 30.11.2020	I.A. No.4 of 2021 filed in O.P. No. 21 & 22 of 2017, filed on 08.03.2021.	31.03.20 21*	Relevant extracts of Commission’s Interim Order dt. 27.03.2021 produced herein: <i>“Further, Model Code of Conduct has come into force from 11.02.2021 in view of Biennial Elections to Telangana State Legislative Council and it will be in existence till 22.03.2021”.</i>	
<p>*Note-1: Petition rejected by TSERC vide Order dt. 22.12.2021 in O.P. (SR) No. 14 of 2021 & O.P. (SR) No. 15 of 2021 on account of the Petition not being accompanied by FPT for FY 2021-22 in derogation of Regulation No. 5 of 2005. Furthermore, the time period for which they sought was already lapsed.</p>					

	<p>*Note-2:It is pertinent to note that the Discoms have only undertaken ARR and Tariff Proposal for FY 2022-23 only pursuant to the Hon'ble Commission's direction in s Order dated 18.09.2020 in O.P.No.23 of 2020.</p> <p>1. The Telangana Discoms have failed to meet the regulatory requirements of timely filing of ARR for FY 2019-2020, FY 2020-21, and FY 2021-22, leading to the accumulation of abnormal (alleged) true-up gaps, which the TS Discoms seek to pass on to the consumers in FY 2023-24.</p> <p>2. It is submitted that the TS Discoms ought not be allowed to recover the entire amount in True-up while it has continued to make a mockery of the relevant laws and regulations.</p>	
	A.	
	<p>3. A preliminary analysis of the ARR filings undertaken by the Discoms for the ARR, Tariff proposal and True-up for FY 2019-20, 2020-21 and 2021-22 indicates gross violation of the following provisions of:</p> <p style="padding-left: 40px;">B. APERC (Terms and Conditions for determination of Tariff for Wheeling and Retail Supply of Electricity) Regulation No. 04 of 2005;</p> <p style="padding-left: 40px;">C. APERC Regulation No. 01 of 2014;</p> <p style="padding-left: 40px;">D. APERC Conduct of Business Regulations, 2015; Electricity Act, 2003</p>	TS Discoms have replied to the detailed objections of the Objector in following replies:
	<p>4. <u>APERC (Terms and Conditions for determination of Tariff for Wheeling and Retail Supply of Electricity) Regulation No. 04 of 2005:</u></p>	
	4.1 Non-submission Power Procurement Plans by Discoms for Control Period FY 2019-2024:	TS Discoms submit that they have undertaken activities for submission of Power Procurement Plan for the 4 th Control Period FY 2019-20 to FY 2023-24.However, on account of

<p>As per Regulation 12.1 of Regulation No. 04 of 2005, a Discoms shall be allowed to recover the cost of Power it procures for supply to consumers based on the Commission-approved Power Procurement Plan covering each year of the Control Period. Accordingly, the Discoms should be disallowed from recovering the entire Power Purchase cost in true-up when the Power Procurement Plans for each financial year of the Control Period itself has not been timely filed for the Hon'ble Commission's approval.</p>	<p>the same reasons for which the ARR and Tariff Petitions for FY 2019-20, FY 2020-21 and FY 2021-22 were delayed, TS Discoms were not able to file the Power Procurement Plan.</p>
<p>4.2 It is pertinent to reproduce the extract of the Hon'ble Commission's Order dt. 29.04.2020 pertaining to ARR and Wheeling Tariffs for Distribution Business for 4th Control Period (FY 2019-20 to FY 2023-24) for TSSPDCL and TSNPDCL: <i>"Commission's Views</i></p> <p><i>3.5.14 Regulation No.4 of 2005 stipulates the Distribution Licensees to file their Resource Plans on 1st April of the year preceding the first year of the Control Period. The Resource Plan shall inter-alia contain the sales forecast, load forecast, power procurement plan, and Distribution Plan (Capital Investment Plan) consistent with the requirements of the Commission's Guidelines on Load Forecast and Resource Plan (Distribution Plan and Power Procurement Plan). Further, the Resource Plan as approved by the Commission shall be adopted by the Distribution Licensees in their Multi-Year and Annual filings for the Control Period.</i></p> <p><i>3.5.15 The Resource Plans for 4th Control Period from FY 2019-20 to FY 2023-24 and 5th Control Period from FY 2024-25 to FY 2028-29 was to be filed on 01.04.2018. The DISCOMs have filed their Resource Plans for 4th Control Period on 31.10.2018. In the Resource Plans submitted, the DISCOMs stated that the formulation of power</i></p>	

	<p><i>procurement plan in coordination with various generators is under process and the same shall be submitted at an early date. In replies to stakeholders" comments, the DISCOMs submitted that the power procurement plan would be submitted shortly. The DISCOMs have not submitted the power procurement plan in compliance with the Guidelines. Further, the DISCOMs in seeking extension of time for filing of MYT Petitions for 4th Control Period cited the reasons of finalisation of annual accounts and non-receipt of information of Lift Irrigation schemes from Irrigation Department.</i></p> <p><i>3.5.16 The Commission is of the considered view that as the filing of MYT Petitions for 4th Control Period has already been delayed, further delay on determination of MYT for 4th Control Period is undesirable for want of approval of Resource Plans. The DISCOMs have submitted their Capital Investment Plans for 4th Control Period in the instant Petitions. On prudence check of the same, the Commission has approved the Capital Investment Plan for 4th Control Period in this Order as detailed in Chapter 5."</i></p>	
	<p>5. APERC Regulation No. 01 of 2014:</p> <p>5.1 As per the preamble appended to this Regulation, in view of the complexities involved in forecasting the Sales and Revenue Requirement of Retail Supply Business, on the behest of the TS Discoms themselves, the TS Discoms were allowed to file ARR and Tariff Proposals on an annual basis.</p>	<p>T TS Discoms submit that the Hon'ble Commission has rightfully admitted the complexities involved in forecasting the Sales and Revenue Requirement of Retail Supply Business and accordingly has allowed to file ARR and Tariff Proposals on an annual basis till now.</p>
	<p>5.2 It is noteworthy to mention that the cost of power procurement constitutes around 75% of total cost of ARR and since the quantum of variation on account of the same each year may be high, henceforth vide this Regulation, cost recovery was provided on an annual basis with a view to neither burden the consumers nor the Licensee.</p>	

<p>5.3 It is evident from the Table above, that the TS Discoms are in clear cut violation of the APERC Regulation No. 01 of 2014 on account of non-filing of complete ARR and Tariff Proposals for FY 2019-20, FY 2020-21 and FY 2021-2022, and now wishes to claim entire variation on account of power purchase cost in True-up of aforementioned period on the basis of ARR determined for FY 2018-19.</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"> • Enforcement of Model Code of Conduct in the State of Telangana in view of elections for Telangana Assembly. • 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. • Enforcement of Model Code of Conduct in the State of Telangana from 10.03.2019 till 23.05.2019 (Lok Sabha election). • Pending information from I & CAD department on Lift Irrigation (LI) schemes. • 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. • Issuance of model code of conduct for the Municipal elections from 23.12.2019 to 25.01.2020 • Further extension in view of preparation of tariff proposals in accordance to the MoP recommendations on Tariff Rationalisation process. • 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. • Enforcement of Model Code of Conduct from 17th Nov 2020 to 4th Dec 2020 in view of GHMC elections. • 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.
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		<p>As also pointed out by the Objector, TS Discoms have been seeking timely extension on tariff filing from the Hon'ble Commission on the grounds mentioned above.</p> <p>In view of the above reasons, TS Discoms request the Hon'ble Commission to consider the True up Petitions filed by them.</p>
	5.4 It is pertinent to mention the limited scope of Regulation 1 of APERC Regulation No. 01 of 2014: <i>"This Regulation will only be applicable as long as the Tariff for Retail Supply Business is filed on an annual basis"</i> .	
	5.5 Since, the Discoms have failed to undertake annual filing of ARR for FY 2019-20, FY 2020-21, and FY 2021-2022, accordingly their true-up claims with respect to power purchase cost variation are liable to be rejected.	
	<p>6. Regulation 24 of the Conduct of Business Regulations, 2015 and Section 94 of EA 2003:</p> <p>6.1 Regulation 24 of the Conduct of Business Regulations, 2015 and Section 94 of EA 2003, empowers the Hon'ble Commission to pass such interim Orders as it deems fit in accordance with the Act. However, there is a mandate on the Commission under Section 86 of EA 2003 to ensure <i>transparency</i> in exercise of its functions and powers.</p>	<p>TS Discoms would like to state that it is unfair on the part of the objector to question the intent of the Hon'ble Commission on performing its statutory duties. TS Discoms have made submissions explaining the reasons for delay in submission of the ARR and tariff filings for FY 2019-20 to FY 2021-22 to the Hon'ble Commission and the Hon'ble Commission after considering the same and after being satisfied only has issued interim Orders to extend the tariff approved for FY 2018-19 to the period from FY 2019-20 to FY 2021-22.</p>
	6.2 From the relevant TSERC's Order as encapsulated in the Table above, it is apparent that the Discoms have failed to provide any concrete rationale for its inability to file ARR and Tariff Proposals. Any communication on the subject between the Discom and Commission is also not available for public scrutiny;	
	6.3 In such interim Proceedings, neither there were any Respondents, nor any Stakeholders involved. There is nothing to indicate as to why there was even a	

<p>need of extension by the Discoms in filing of the ARR for FY 2019-2020; 2020-2021 and 2021-22 in order to assess the veracity of the Discom's claims and why the same was subsequently allowed</p>	
<p>6.4 Further, the TS Discoms even failed to provide a time period by which they expected to fulfil the ARR and Tariff filings for the relevant years as an apparent attempt to evade the regulatory mandates and timelines;</p>	<p>TS Discoms submit that timelines stipulated for various activities as per the regulatory framework could not be followed on account of the consequent events which are themselves the reasons submitted by the TS Discoms in the above reply.</p>
<p>6.5 The ARR and Tariff Proposals for a particular FY are to be filed by November of the previous year – therefore, <i>at least 120 days</i> are available to the Hon'ble Commission for determination of RST Order. However, all the three IAs asking for extension for filing of ARR were made 3-4 months post the expiry of the statutory timeline for the same and hence ought not to have been allowed;</p>	<p>In view of the above, TS Discoms request the Hon'ble Commission to consider the True up Petitions filed by them.</p>
<p>6.6 While allowing the extension to the TS Discoms vide the relevant Interim Order for filing of the ARR and Tariff proposals for FY 2019-2022, the Hon'ble Commission vide Interim Orders dt. 06.11.2019, 20.03.2020 and 27.03.2021 had directed the DISCOMs to file the regular Petition for determination of fresh retail supply tariff, cross-subsidy and additional surcharged immediately for FY 2019-20, 2020-21 and 2021-22 respectively.</p>	<p>As regards to the Hon'ble APTEL's direction, TS Discoms submit that Regarding the delay in ARR proposals, TS Discoms would like to state that they have been filing the ARR petitions on annual basis before the Hon'ble Commission (TSERC) until FY 2018-19 without any delay. Further, for the period in which the Petitions could not be filed, TS Discoms have also not claimed any carrying cost.</p>
<p>6.7 However, it is evident that the same was not complied with by the Discoms till April of 2021 (by which time, the period for which it had been sought had already lapsed);</p>	
<p>6.8 Furthermore, nowhere in the Orders issued by the Hon'ble Commission, has it been indicated that the Discoms are at liberty to extend the ARR for FY 2018-19 for the entire period of 2019-2022 and then without any fresh ARR determination for the latter periods be allowed to recover the accumulated revenue gap in true-up and then unnecessarily burden the consumers</p>	

6.9 This amounts to a gross violation of Hon'ble ATE Direction directives in O.P. No. 1 of 2011:

*"57. This Tribunal has repeatedly held that regular and timely truing-up expenses must be done since: (b) The **burden/benefits of the past years must not be passed on to the consumers of the future.** ...*

*59. **Tariff determination** ought to be treated as **a time bound exercise.***

...

65. In view of the analysis and discussion made above, we deem it fit to issue the following directions to the State Commissions:

*(ii) It should be the endeavour of every State Commission to ensure that the tariff for the financial year is decided before 1st April of the tariff year. For example, the ARR & tariff for the financial year 2011- 12 should be decided before 1st April, 2011. **The State Commission could consider making the tariff applicable only till the end of the financial year so that the licensees remain vigilant to follow the time schedule for filing of the application for determination of ARR/tariff.***

*(iii) **In the event of delay in filing of the ARR, truing up and Annual Performance Review, one month beyond the scheduled date of submission of the petition, the State Commission must initiate suomoto proceedings for tariff determination in accordance with Section 64 of the Act read with clause 8.1 (7) of the Tariff Policy.***

(Emphasis supplied)

	<p>7. Additionally, the credit rating of the Power Utilities to get loans gets affected with Non-submission of the ARR and Tariff Proposals: In the Integrated Rating Score Methodology introduced by Ministry of Power for assessing the health of Discoms, one of the Parameter is Specific Disincentives which provides for Tariff Cycle Delays in terms of timely filing of the Petitions.</p>	
	<p>8. By allowing utilities to claim the entire cost variation in power purchase trueup without filling of the ARR for the relevant Financial Year but instead continued to levy existing Tariff will set a bad authority as it would be tantamount to the fact that utilities can continue to be in violation of the regulatory and legal process and still burden the consumers without taking any burnt for the same. This would essentially leave the entire exercise of annual filing of ARR and Tariff Proposals on projection basis before the beginning of the FY and subsequent true-up on basis of actuals futile.</p>	
	<p>9. For the aforementioned reasons it is humbly submitted before the Commission to disallow the Discoms their true up claims for the year 201920, 2020-21 and 2021-22 in the face of non-filing of ARR and Tariff Proposals for the relevant years and set an authority for utilities to operate within the stipulated timelines and not on its own whims to unnecessarily burden the consumers.</p>	
	<p>10. Notwithstanding the above, the other objections against the True-up claimed by the Petitions are detailed in the subsequent sections.</p>	
4	<p>POWER PURCHASE COST: A. TSGENCO Thermal Power Stations: i) Arbitrary Escalation considered in Variable Charges: It is observed that the both Petitioners, i.e., TSSPDCL and TSNPDCL have shown significant escalation in</p>	<p>TS Discoms submit that the power purchase cost paid by them is after verification of the bills raised by the generating companies. TS Discoms, as part of additional information are submitting the invoices raised by</p>

	variable charge rate as compared to Hon'ble Commission approved values for the period during FY 2016-17 to FY 2018-19 and FY 2022-23.						generating stations from which they have procured power from.																																																																																																													
	ii) The variation is particularly observed in case of some TSGENCO thermal stations without providing any rationale with the instant Petitions. It is submitted that the variation from the approved values ought to be supported by proper rationale. The Objector in the absence of proper backing/rationale has limited the variable charge rate to the approved variable charge rate in the respective RST orders.																																																																																																																			
	iii) The anomalies observed in this regard have been reproduced below: <table border="1" data-bbox="212 626 1234 1351"> <thead> <tr> <th rowspan="3">TSGENCO Generating stations</th> <th colspan="3">TSSPDCL</th> <th colspan="3">TSNPDCL</th> </tr> <tr> <th colspan="3">Variable Charge Rate (Rs/kWh)</th> <th colspan="3">Variable Charge Rate (Rs/kWh)</th> </tr> <tr> <th>Approved</th> <th>Claimed</th> <th>Escalation %</th> <th>Approved</th> <th>Claimed</th> <th>Escalation %</th> </tr> </thead> <tbody> <tr> <td>FY 2016-17</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>KTPS-D</td> <td>2.02</td> <td>2.22</td> <td>10%</td> <td>2.02</td> <td>2.22</td> <td>10%</td> </tr> <tr> <td>FY 2017-18</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>KTPS-A</td> <td>2.07</td> <td>2.91</td> <td>41%</td> <td>2.08</td> <td>2.92</td> <td>40%</td> </tr> <tr> <td>KTPS-B</td> <td>2.07</td> <td>2.91</td> <td>41%</td> <td>2.08</td> <td>2.92</td> <td>40%</td> </tr> <tr> <td>KTPS-D</td> <td>1.92</td> <td>2.54</td> <td>33%</td> <td>1.93</td> <td>2.54</td> <td>32%</td> </tr> <tr> <td>KTPS Stage VI</td> <td>2.45</td> <td>2.75</td> <td>12%</td> <td>2.45</td> <td>2.75</td> <td>12%</td> </tr> <tr> <td>RTS B</td> <td>2.36</td> <td>2.91</td> <td>23%</td> <td>2.38</td> <td>2.95</td> <td>24%</td> </tr> <tr> <td>FY 2018-19</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>KTPS-A</td> <td>2.17</td> <td>3.20</td> <td>47%</td> <td>2.18</td> <td>3.19</td> <td>46%</td> </tr> <tr> <td>KTPS-B</td> <td>2.17</td> <td>3.20</td> <td>47%</td> <td>2.18</td> <td>3.19</td> <td>46%</td> </tr> <tr> <td>KTPS-C</td> <td>2.17</td> <td>3.20</td> <td>47%</td> <td>2.18</td> <td>3.19</td> <td>46%</td> </tr> <tr> <td>KTPS-D</td> <td>2.02</td> <td>2.82</td> <td>39%</td> <td>2.03</td> <td>2.82</td> <td>39%</td> </tr> </tbody> </table>							TSGENCO Generating stations	TSSPDCL			TSNPDCL			Variable Charge Rate (Rs/kWh)			Variable Charge Rate (Rs/kWh)			Approved	Claimed	Escalation %	Approved	Claimed	Escalation %	FY 2016-17							KTPS-D	2.02	2.22	10%	2.02	2.22	10%	FY 2017-18							KTPS-A	2.07	2.91	41%	2.08	2.92	40%	KTPS-B	2.07	2.91	41%	2.08	2.92	40%	KTPS-D	1.92	2.54	33%	1.93	2.54	32%	KTPS Stage VI	2.45	2.75	12%	2.45	2.75	12%	RTS B	2.36	2.91	23%	2.38	2.95	24%	FY 2018-19							KTPS-A	2.17	3.20	47%	2.18	3.19	46%	KTPS-B	2.17	3.20	47%	2.18	3.19	46%	KTPS-C	2.17	3.20	47%	2.18	3.19	46%	KTPS-D	2.02	2.82	39%	2.03	2.82
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	Kakatiya Thermal Power Plant I	2.55	3.34	31%	2.56	3.35	31%																												
	Kakatiya Thermal Power Plant II	2.36	2.92	24%	2.36	2.93	24%																												
	iv) It is humbly submitted that Hon'ble Commission may direct the TS Discoms to submit proper rationale/justification/backing for such significant escalation considered in variable charge rate.																																		
	v) It is further requested that Hon'ble Commission may limit the variable charge rate to approved variable charge rate. Summary of disallowance in Variable Charges: <i>(All figures in Rs. Crores)</i>							It is unfair on part of the objector to request the Hon'ble Commission to limit the variable charges to the approved variable charge rate. TS Discoms request the Hon'ble Commission to approve the actual variable charge as claimed after prudence check of the claims made by the TS Discoms.																											
	<table border="1"> <thead> <tr> <th colspan="4">Disallowance Proposed in Variable Cost as per Objector</th> </tr> <tr> <th>Financial Year</th> <th>TSSPDCL</th> <th>TSNPDCL</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>FY 17</td> <td>19.79</td> <td>-</td> <td>19.79</td> </tr> <tr> <td>FY 18</td> <td>325.82</td> <td>159.61</td> <td>485.43</td> </tr> <tr> <td>FY 19</td> <td>925.30</td> <td>385.41</td> <td>1,310.71</td> </tr> <tr> <td>FY 23</td> <td>449.09</td> <td>201.49</td> <td>650.58</td> </tr> <tr> <td>Total</td> <td>1,719.99</td> <td>746.52</td> <td>2,466.51</td> </tr> </tbody> </table>								Disallowance Proposed in Variable Cost as per Objector				Financial Year	TSSPDCL	TSNPDCL	Total	FY 17	19.79	-	19.79	FY 18	325.82	159.61	485.43	FY 19	925.30	385.41	1,310.71	FY 23	449.09	201.49	650.58	Total	1,719.99	746.52
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	B. Central Generating Stations: i) It is pointed out that the Hon'ble Commission has clearly directed the TS Discoms to consider null capacity allocation from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd from 01.08.2017 onwards.							The direction of the Hon'ble Commission for not considering the capacity allocation from NTECL Vallur TPS and NLC Tamil Nadu Power Limited was on account of the higher cost of power from such stations.																											

<p>ii) In line with directive, the Hon'ble TSERC has not considered any capacity allocation from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd in its past RST order dt. 26.08.2017 for FY 2017-18, RST order dt. 27.03.2018 for FY 2018-19 and latest RST order dt. 23.03.2022 for FY 2022-23.</p>	<p>In this regard it is to be noted that the TS Discoms, on the first hand have themselves submitted a requisition to the Ministry of Power (MoP), Government of India (GoI) expressing their willingness to surrender the share of Telangana State from NTECL Vallur TPS and this has been recorded by the Hon'ble Commission in RST Order for FY 2017-18 (as also extracted by the objector).</p> <p>Further, acknowledging the initiative of the TS Discoms, the Hon'ble Commission in the RST Order for FY 2018-19 had directed to also pursue the willingness of TS Discoms to surrender share of NLC Tamil Nadu Power Limited.</p> <p>In this regard, it is to be noted that since the allocation of power to the States is done by MoP, it is not under the control of TS Discoms to surrender the share of Telangana. TS Discoms, as per the directive of the Hon'ble Commission have made request to surrender Telangana share in NTECL Vallur TPS and NLC Tamil Nadu Power Limited, however, it is still pending to be accepted.</p> <p>In view of the above, it shall be unfair on part of the objector to make such objections and request the Hon'ble Commission to also penalize the TS Discoms</p>
<p>iii) The relevant extracts from the past RST orders have been reproduced below for reference:</p> <ul style="list-style-type: none"> • <u>The Hon'ble Commission in its RST Order dt. 26.08.2017 for FY2017-18 has stated the following:</u> <i>"3.3.17 To reduce the financial burden upon them, the Licensees submitted a requisition to GoI expressing its willingness to surrender the share of Telangana State from NTECL Vallur TPS. In view of the requisition made by the Licensees, the Commission also observes that NLC Tamil Nadu Power Ltd. is also a similar project with high cost of generation. The Commission thus directs the DISCOMs to surrender the allocated share of Telangana State in NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. Hence the Commission in this Order, has not considered the energy availability from these generating stations from 01.08.2017 onwards."</i> • <u>The Hon'ble Commission in its RST Order dt. 27.03.2018 for FY2018-19 has stated the following:</u> <i>3.3.18 The Commission in its Tariff Order for FY 2017-18 dated 26.08.2017 directed the DISCOMs to surrender the allocated share of Telangana State in NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. and accordingly, had not considered the energy availability</i> 	

from these stations from 01.08.2017. The DISCOMs submitted that in response to their request for re-allocation of the share of Telangana State in NTECL Vallur TPS, there is no confirmation from the Ministry of Power, GoI to that effect. The DISCOMs also submitted that the re-allocation of the share in NLC Tamil Nadu Power Ltd. will be taken up after the re-allocation of share in NTECL Vallur TPS. The Commission observed that the DISCOMs are procuring power from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. in FY 2017-18 and have proposed in FY 2018-19 also. **In light of the directions in the Tariff Order for FY 2017-18, the Commission has not considered the share allocation to Telangana State from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. for FY 2018-19.**

- The Hon'ble Commission in its RST order dt. 23.03.2022 for FY 2022-23 has approved the following:

Table 4-15 Power procurement cost from Central Generating Stations for FY 2022-23

Source	Claimed				Approved			
	Quantum MU	Fixed Cost Rs.crore	Variable Cost Rs.crore	Total Rs.crore	Quantum MU	Fixed Cost Rs.crore	Variable Cost Rs.crore	Total Rs.crore
Thermal								
NTPC Ramagundam Stage I & II	2603.01	188.60	690.83	879.22	2716.15	181.22	699.16	880.38
NTPC Ramagundam Stage III	721.42	57.15	162.20	239.35	729.22	53.89	164.17	238.06
NTPC Talcher TPS II	1638.93	117.79	284.28	402.07	1598.29	110.39	277.23	387.62
NTPC Simhadri Stage I	2251.89	478.57	707.56	1186.13	3672.35	356.75	1153.88	1510.63
NTPC Simhadri Stage II	1298.23	230.24	368.51	628.75	1765.35	245.11	541.91	787.02
NTPC Kudgi	1017.12	319.88	348.05	667.92	1751.40	294.24	599.31	893.55
NLC TPS II Stage I	395.60	27.08	104.54	131.63	385.93	28.10	101.99	130.09
NLC TPS II Stage II	710.07	50.12	187.82	237.95	692.64	52.26	183.21	235.47
NNTPP	402.72	68.24	88.03	156.28	392.73	78.22	85.84	164.06
TSPP Unit I	3499.63	790.92	794.42	1585.33	3412.84	711.82	774.72	1486.54
NTECL Vallur TPS	834.63	135.00	245.48	380.48	0.00	0.00	0.00	0.00
NLC Tamil Nadu Power Ltd.	1068.60	188.57	263.77	472.34	0.00	0.00	0.00	0.00
Sub Total	16521.83	2652.16	4315.29	6967.45	17116.91	2112.01	4601.41	6713.42
Nuclear								

iv) It is evident from the Hon'ble Commission past directives/methodology that the TS Discoms have not been allowed to procure power from these two specified Power Stations. Despite this, the TS Discoms have procured power from these stations in clear violation of the Hon'ble TSERC's directives. The TS Discoms claim in this regard as per instant filings is represented below for reference:

TSSPDCL Generating Stations	Approved		Claimed PP cost (In Crores)					Total
	Despatch (MUs)	PP Cost (In Crores)	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	
NTECL Vallur	-	-	93.70	105.43	117.61	246.00	242.00	804.74
NLC	-	-	-	-	-	269.00	-	269.00
Total	-	-	93.70	105.43	117.61		242.00	1,073.74

TSNPDCL	Approved	Claimed PP cost (In Crores)	

Generating Stations	Despatch (MUs)	PP Cost (In Crores)	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	Total
NTECL Vallur	-	-	39.00	41.00	49.00	103.00	101.00	333.00
NLC	-	-	-	-	132.00	113.00	-	245.00
Total	-	-	39.00	41.00	181.00	216.00	101.00	101.00

v) The Objector, in line with the Hon'ble Commission's past methodology/directives, has not considered any capacity allocation from these two generating stations for power purchase computation and disallowed the amount claimed against power purchase cost in regard of these two CGS stations.

(All figures in Rs. Crores)

Disallowance in CGS PP cost as per Objector Assessment			
	Claimed	Objector	Disallowance
TSSPDCL	1,073.74	-	1,073.74
TSNPDCCL	578.00	-	578.00
Total	1,651.74	-	1,651.74

vi) .It is humbly requested that the Hon'ble Commission may penalise the Discoms for not adhering to the directives specified and may allow the power purchase cost from CGS stations as per Objector's Assessment.

C. Sale of Surplus Power

i) It is humbly submitted that the sale of surplus power ought to be made at an optimal price as per market conditions in order to earn revenue and/or reduce the Power Purchase.

ii) It is observed that the TS Discoms have sold the surplus power for some financial year at a price lower than the IEX average MCP for that particular year.

iii) Some instance has been recorded below for reference:

It is to be noted that the TS Discoms have engaged in sale of surplus power considering the real time situation of the market and only if the market conditions are favorable i.e., only in some time blocks when the cost per unit of power available in the market is higher than the actual cost per unit to be incurred by TS Discoms.

	<ul style="list-style-type: none"> • TSSPDCL for FY 2018-19 has recorded 1229.35 MUs as surplus power which is sold at a rate of Rs. 3.10/kWh but IEX MCP for FY 2018-19 is on quite higher side i.e. Rs. 3.86/kWh. • TSNPDCL for FY 2016-17 & FY 2018-19 has recorded 44 MUs and 1150 MUs as surplus power which are sold at a rate of Rs. 2.05/kWh and Rs. 3.18/kWh respectively which is again at a lower side as compared to IEX MCP of Rs. 2.41/kWh and Rs. 3.86/kWh respectively. • TSNPDCL for FY 2016-17 has purchased 544 MUs from market at a rate of Rs. 4.69/kWh which is on a higher side to IEX MCP of Rs. 2.41/kWh. 	<p>In view of the above, it is not correct on the part of objector to consider the average MCP of particular year to arrive at the revenue from sale of surplus power.</p>						
	<p>iv) The Objector has estimated actual revenue ought to be generated from the sale of surplus power in accordance to IEX MCP and reduced the same from power purchase cost. It is prayed that the Hon'ble Commission may allow the sale of surplus power as per the Objector's computations.</p>							
	<p>D. Discom to Discom Sales i) As a general regulatory procedure, Discom to Discom power sales ought to be made in accordance to average power purchase price of the respective Discoms.</p>	<p>It is to be noted that the power from generating stations is dispatched based on central dispatch for the entire state and on real time the energy share of one Discom happens to be utilized by another Discom. The cost component of such D-D transactions equals each other i.e., one being positive and another negative with no cost impact for the State as a whole. ii) Furthermore, it is apparent that the Discoms have deviated from this approach</p>						
	<p>ii) Furthermore, it is apparent that the Discoms have deviated from this approach in their instant True Up petition as can be observed from the Petitioner's claims in respect of D-D transactions:</p> <p style="text-align: center;">Summary of D-D sales as per Petitioners:</p> <table border="1" data-bbox="205 1252 1234 1359"> <thead> <tr> <th data-bbox="205 1252 590 1308"></th> <th data-bbox="590 1252 1234 1308">As per Petitioner</th> </tr> <tr> <th data-bbox="205 1308 590 1359">Particulars</th> <th data-bbox="590 1308 1234 1359">F / 2022-23</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>		As per Petitioner	Particulars	F / 2022-23			<p>in their instant True Up petition as can be observed from the Petitioner's claims. It is to be observed that the Objector has considered a different per unit cost for such D-D settlements than that</p>
	As per Petitioner							
Particulars	F / 2022-23							

	Energy	Cost	Unit Price
	MUs	Rs. Crores	Rs/kWh
Sale to TSSPDCL	1,183.00	451.00	3.81
Average Power Purchase Cost for TSNPDCL	20,660.00	11,637.00	5.63

Particulars	FY 2019-20			FY 2020-21			FY 2021-22		
	Energy	Cost	Unit Price	Energy	Cost	Unit Price	Energy	Cost	Unit Price
	Mus	Rs. Crores	Rs/kWh	Mus	Rs. Crores	Rs/kWh	Mus	Rs. Crores	Rs/kWh
Sale to TSNPDCL	2,345.21	900.07	3.84	2,174.46	846.42	3.89	958.00	400.00	4.18
Average Power Purchase Cost for TSSPDCL	39,797.25	21,501.33	5.40	38,200.03	21,510.51	5.63	45,480.00	25,033.00	5.50

claimed by the TS Discoms. In this regard, it is to be noted that irrespective of the per unit cost considered, the overall cost impact on the State should be zero. Considering the same, the Objector's contention of additional revenue generation does not hold good as the additional revenue generation of one Discom is compensated by the additional cost incurred by other Discom.

iii) The Objector has re-worked the allowable actual Average Power Purchase Cost for TSSPDCL and TSNPDCL (which has been taken as the price at which power is to be sold from TSSPDCL to TSNPDCL) considering the previous sections of the instant Objections. The same has been shown below:

Summary of D-D transactions as per Objector's Assessment

Particulars	FY 2019-20			FY 2020-21			FY 2021-22		
	Energy	Cost	Unit Price	Energy	Cost	Unit Price	Energy	Cost	Unit Price
	Mus	Rs. Crores	Rs/kWh	Mus	Rs. Crores	Rs/kWh	Mus	Rs. Crores	Rs/kWh

Sale to TSNPDCL	2,345.2 1	1,267.0 5	5.40	2,174.4 6	1,224.4 4	5.63	958.0 0	527.3 0	5.50
Average Power Purchase Cost for TSSPDCL	39,797. 25	21,501. 33	5.40	38,200. 03	21,510. 51	5.63	45,480. 00	25,033. 00	5.50

Particulars	As per Objector		
	FY 2022-23		
	Energy	Cost	Unit Price
	Mus	Rs. Crores	Rs/kWh
Sale to TSSPDCL	1,183.00	666.34	5.63
Average Power Purchase Cost for TSNPDCL	20,660.00	11,637.00	5.63

iv) The Objector has computed the amount of Rs. 3685.13 pertaining to revenue generated form D-D Sales @ MCP which is 1087.64 Crores more than the Petitioner's Claim. The same is tabulated below for reference

(All figures in Rs. Crores)

Revenue Generated by D-D sales

FY	Petitioner (A)	Objector (B)	Excess Revenue Generated (B-A)
FY 2019-20	900.07	1,267.05	366.98
FY 2020-21	846.42	1,224.44	378.02
FY 2021-22	400.00	527.30	127.30
FY 2022-23	451.00	666.34	215.34
Total	2,597.49	3,685.13	1,087.64

No Comments

	<p>E. Interest on Pension Bonds:</p> <p>i) It is a set principle that pension funds must be maintained from the contributions of the management & employees and should be used appropriately to earn interest thereon.</p>	<p>The erstwhile APERC in the Order dated 24.03.2003 in O.P.No. 402 of 2002 allowed the liability of additional interest on pension bonds as a pass through in the tariff on a year to year basis up to the FY 2032-33. The aforementioned Order of the APERC shows that any additional liability due to increase in the amount of pension is recognised as a pass through in the tariff of APGENCO. After the formation of the Telangana State, the pension liability was passed on to TSGENCO.</p>
	<p>ii) It is observed that the both petitioners have claimed the interest on pension bonds for some financial years even greater than the approved amount by Hon'ble Commission in its past RST orders.</p>	<p>The additional interest on pension bonds claimed by the TS Discoms are the amounts as claimed by TS GENCO in line with the aforementioned Order dated 24.03.2003 in O.P.No. 402 of 2002. In this regard, it is to be noted that the amount approved by the</p>
	<p>iii) The escalated amount is claimed without any data backing and documents, even the Objector is unable to verify the same amount from the audited accounts available in public domain.</p>	<p>Hon'ble Commission in the RST Order is provisional in nature and at the end of year, TS Genco raises supplementary bills to TS Discoms with the actual pension liabilities paid by it.</p> <p>For FY 2016-17, the variation of actual amount from the approved amount is on account of adjustment of pension liabilities outstanding for past three years. For the period from FY 2019-20 to FY 2021-22, it is to be noted that TS Discoms could not file the ARR and Tariff Petitions and considering the same, the approved amount was considered as equal to the approved value in RST Order for FY 2018-19.</p> <p>Further, the variation of actual amount from the approved amounts is on account of past liabilities and the supplementary bills raised by TS Genco at the end of the respective year.</p>

<p>iv) The Hon'ble Commission in its TSGENCO MYT Order dt. 22.03.2022 has also issued following directive in this regard:</p> <p><i>"New Directives</i> <i>10. Liabilities on pension bonds</i> <i><u>The Commission directs TS Genco to extract the request of the stakeholder that the Government of Telangana shall bear the additional burden of pension bonds and communicate to the Principal Secretary, Energy, GoTS for favourable consideration.</u></i>"</p>	<p>TS Discoms submit that till the time GoTS accepts to bear the additional burden of pension bonds, TS Discoms are required to pay for the claims made by the TS Genco as per the aforementioned Order dated 24.03.2003 in O.P.No. 402 of 2002.</p>																																																							
<p>v) As the instant matter is backdated and lacking substantial justification, the Objector for the computation of Power Purchase Cost has limited the interest amount to its approved value.</p> <table border="1" data-bbox="247 781 1228 1304"> <thead> <tr> <th colspan="5">Summary of Disallowance in Interest on Pension Bonds</th> </tr> <tr> <th></th> <th>Approved</th> <th>Claimed</th> <th>Objector</th> <th>Disallowance</th> </tr> </thead> <tbody> <tr> <td colspan="5">TSSPDCL</td> </tr> <tr> <td>FY 2016-17</td> <td>227.17</td> <td>1,311.08</td> <td>227.17</td> <td>1,083.91</td> </tr> <tr> <td>FY 2019-20</td> <td>273.08</td> <td>821.73</td> <td>273.08</td> <td>548.65</td> </tr> <tr> <td>FY 2020-21</td> <td>482.77</td> <td>827.28</td> <td>482.77</td> <td>344.51</td> </tr> <tr> <td>FY 2021-22</td> <td>482.77</td> <td>762.00</td> <td>482.77</td> <td>279.23</td> </tr> <tr> <td>Total TSSPDCL (A)</td> <td>1,465.79</td> <td>3,722.09</td> <td>1,465.79</td> <td>2,256.30</td> </tr> <tr> <td colspan="5">TSNPDCL</td> </tr> <tr> <td>FY 2016-17 (B)</td> <td>95</td> <td>547</td> <td>95</td> <td>452.00</td> </tr> <tr> <td>Total (A+B)</td> <td>1,560.79</td> <td>4,269.09</td> <td>1,560.79</td> <td>2,708.30</td> </tr> </tbody> </table>	Summary of Disallowance in Interest on Pension Bonds						Approved	Claimed	Objector	Disallowance	TSSPDCL					FY 2016-17	227.17	1,311.08	227.17	1,083.91	FY 2019-20	273.08	821.73	273.08	548.65	FY 2020-21	482.77	827.28	482.77	344.51	FY 2021-22	482.77	762.00	482.77	279.23	Total TSSPDCL (A)	1,465.79	3,722.09	1,465.79	2,256.30	TSNPDCL					FY 2016-17 (B)	95	547	95	452.00	Total (A+B)	1,560.79	4,269.09	1,560.79	2,708.30	<p>In view of the above submissions, TS Discoms request the Hon'ble Commission to approve the additional interest on pension bonds as claimed.</p>
Summary of Disallowance in Interest on Pension Bonds																																																								
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<p>F. Miscellaneous Charges (Transmission Cost, SLDC Cost & PGCIL & ULDC OR POSOCO Charges)</p> <p>i) The TSSPDCL and TSNPDCL have claimed a cumulative amount of Rs. 13,888.89 Crores and Rs. 5,874 Crores respectively towards Transmission Cost, SLDC Cost & PGCIL & ULDC OR POSOCO Charges).</p>	<p>TS Discoms submit that the Transmission Cost, SLDC cost and PGCIL & ULDC or POSOCO Charges are approved along with the power purchase cost in the respective tariff orders.</p>																																													
<p>ii) It is submitted that Hon'ble Commission in its past RST for FY 2016-17, 2017-18, FY 2018-19 & FY 2022-23 orders have not included any of these charges in while approving power purchase cost. But the Petitioners have also shown amount pertaining to these charges under approved values for calculating Power Purchase deviation.</p>	<p>It is an established fact that the cost of power purchase from the perspective of a distribution licensee includes all the cost incurred in such procurement and it includes the cost incurred for transmission of power till its distribution network.</p>																																													
<p>iii) In line with the same methodology as followed by the Hon'ble Commission in its past RST for FY 2016-17, 2017-18, FY 2018-19 & FY 2022-23 orders, the objector has computed the power purchase cost without considering any true-up in these charges. The summary of charges considered by the Petitioner in Power Purchase True up claim is summarized below:</p> <p>Charges Claimed by Petitioners for FY 2016-17 to FY 2022-23:</p> <p style="text-align: right;">(All</p> <p style="text-align: center;">Figures in Crores)</p> <table border="1" data-bbox="210 1068 1234 1352"> <thead> <tr> <th>Both Discoms</th> <th>FY 17</th> <th>FY 18</th> <th>FY 19</th> <th>FY 20</th> <th>FY 21</th> <th>FY 22</th> <th>FY 23</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Transmission Cost</td> <td>1,790.12</td> <td>1,024.00</td> <td>1,409.00</td> <td>1,410.53</td> <td>2,317.07</td> <td>2,857.00</td> <td>-</td> <td>10,807.72</td> </tr> <tr> <td>SLDC Cost</td> <td>28.86</td> <td>33.00</td> <td>35.00</td> <td>34.84</td> <td>49.60</td> <td>51.00</td> <td>-</td> <td>232.30</td> </tr> <tr> <td>PGCIL Charges</td> <td>735.77</td> <td>1,096.00</td> <td>1,577.00</td> <td>2,232.00</td> <td>1,511.30</td> <td>1,569.00</td> <td>-</td> <td>8,721.07</td> </tr> <tr> <td>ULDC or POSOCO Charges</td> <td>1.60</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>1.60</td> </tr> </tbody> </table>	Both Discoms	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22	FY 23	Total	Transmission Cost	1,790.12	1,024.00	1,409.00	1,410.53	2,317.07	2,857.00	-	10,807.72	SLDC Cost	28.86	33.00	35.00	34.84	49.60	51.00	-	232.30	PGCIL Charges	735.77	1,096.00	1,577.00	2,232.00	1,511.30	1,569.00	-	8,721.07	ULDC or POSOCO Charges	1.60	-	-	-	-	-	-	1.60	<p>It is to be noted that as per Clause 11 of Regulation No. 4 of 2005, the ARR items under Retail Supply Business include both cost of power procurement and Transmission charges and the Regulation No. 1 of 2014 i.e, first amendment to Regulation No. 4 of 2005 provides for true up for Retail Supply Business implying the true up of both cost of power procurement and transmission charges and considering the same TS Discoms have filed the instant true up filings including the Transmission Cost, SLDC cost and PGCIL & ULDC or POSOCO Charges</p> <p>In view of the above, the objection that the cost incurred for transmission shall not be included in true up is not valid and lacks proper justification</p>
Both Discoms	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22	FY 23	Total																																						
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ULDC or POSOCO Charges	1.60	-	-	-	-	-	-	1.60																																						

Total	2,556.35	2,153.00	3,021.00	3,677.37	3,877.97	4,477.00	-	19,762.69
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Charges shown by Petitioners in approved PP cost for FY 2016-17 to FY 2022-23:
(All

Figures in Crores)

Both Discoms	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22	FY 23	Total
Transmission Cost	1,702.09	1,024.00	1,408.57	1,410.53	2,317.07	2,857.00	-	10,719.26
SLDC Cost	28.86	33.00	34.50	34.84	49.60	51.00	-	231.80
PGCIL Charges	521.90	1,174.00	922.98	922.98	922.98	922.98	-	5,387.82
ULDC or POSOCO Charges	6.14	-	-	-	-	-	-	6.14
Total	2,258.99	2,231.00	2,366.05	2,368.35	3,289.64	3,830.98	-	16,345.01

5 **SUMMARY OF OBJECTOR'S ASSESSMENT OF ALLOWABLE TRUE UP CLAIM FOR FY 2016-17 TO FY 2022-23:**
i) On accumulating the above discussed parameters, the true up amount as per Objector's assessment vs Petitioner's submission are provided below:

TS Discoms appreciate the intention and efforts put in by the objector, behind the analysis undertaken on the true up claims for the period from FY 2016-17 to FY 2022-23. However, TS Discoms feel that the approach followed is intended only towards the reduction of the claims made by the TS Discoms.

Summary of True Up claim for TSSPDCL and TSNPDCL for FY 2016-17 to FY 2022-23

(All figures in Rs. Crores)

PP Cost True up claimed by TS Discoms			As per Objector Assessment			
FY	TSSPDCL	TSNPDC	Total	TSSPDCL	TSNPDC	Total
FY 2016-17	-230.59	-38.78	-269.37	-1,545.66	-703.58	-2,249.24
FY 2017-18	-365.23	126.73	-238.50	-628.99	-16.14	-645.14
FY 2018-19	877.23	-266.31	610.92	-646.87	-960.00	-1,606.87
FY 2019-20	30.20	593.87	624.07	-1,965.87	218.85	-1,747.02
FY 2020-21	1,106.80	490.25	1,597.05	-148.67	136.82	-11.85
FY 2021-22	6,372.00	2,417.81	8,789.81	4,994.45	2,012.00	7,006.45
FY 202223*	1,270.39	-369.10	901.29	580.31	-886.93	-306.62
Total True up/(True Down)	9,060.80	2,954.47	12,015.27	638.70	-198.99	439.71

*Note: Detailed computation of Power Purchase True Up/ (True Down) as per Objector's Assessment is attached herewith as **Annexure A**.

TS Discoms have responded to the item-wise objections/suggestions 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

ii) The detailed summary of Objector's Assessment Vs Petitioner's Claim of True up claim for FY 2016-17 to FY 2022-23 is provided below:

(All figures in Rs. Crores)

TSSPDCL	FY 2016-17		FY 2017-18		FY 2018-19		FY 2019-20	
	Petitioner	Objector	Petitioner	Objector	Petitioner	Objector	Petitioner	Objector
PP True up/ (True Down)	1,588.32	273.18	936.04	672.28	3,799.05	2,274.95	3,900.32	1,904.25
<u>Additional Support by GoTS</u>	1,583.83	1,583.83	908.79	908.79	1,680.00	1,680.00	1,400.00	1,400.00
Loss Funding	235.01	235.01	392.48	392.48	1,241.82	1,241.82	2,470.12	2,470.12
Net True Up/(True Down)	-230.52	-1,545.6	-365.23	-628.99	877.23	-646.87	30.20	-1,965.87

(All figures in Rs. Crores)

FY 2020-21		FY 2021-22		FY 2022-23		Total TSSPDCL	
Petitioner	Objector	Petitioner	Objector	Petitioner	Objector	Petitioner	Objector
3,230.80	1,975.33	6,372.00	4,994.45	1,270.39	580.31	21,096.92	12,674.75
-	-	-	-	-	-	5,572.62	5,572.62
2,124.00	2,124.00	-	-	-	-	6,463.43	6,463.43

(All figures in Rs. Crores)

TSNPDCCL	FY 2016-17		FY 2017-18		FY 2018-19		FY 2019-20	
	Petitioner	Objector	Petitioner	Objector	Petitioner	Objector	Petitioner	Objector
PP True up/ (True Down)	715.91	50.63	672.26	529.39	1,216.55	522.86	1,752.02	1,377.00
Additional Support by GoIS	678.79	678.79	389.48	389.48	720.00	720.00	600.00	600.00
Loss Funding	75.42	75.42	156.05	156.05	762.86	762.86	558.15	558.15
Net True Up/(True Down)	-38.30	-703.58	126.73	-16.14	-266.31	-960.00	593.87	218.85

(All figures in Rs. Crores)

FY 2020-21		FY 2021-22		FY 2022-23		Total TSNPDCL	
Petitioner	Objector	Petitioner	Objector	Petitioner	Objector	Petitioner	Objector
1,710.43	1,357.00	2,417.81	2,012.00	-369.10	-886.93	8,115.88	4,961.94
-	-	-	-	-	-	2,388.27	2,388.27
1,220.18	1,220.18	-	-	-	-	2,772.66	2,772.66
490.25	136.82	2,417.81	2,012.00	-369.10	-886.93	2,954.95	-198.99

6 **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;

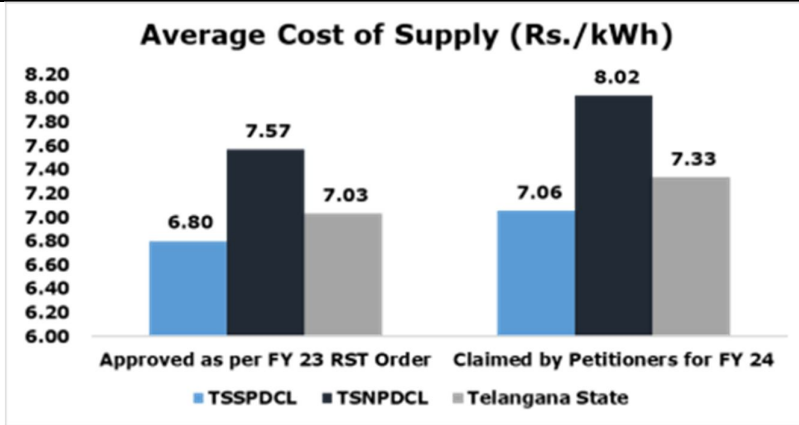
TS Discoms have responded to the item-wise objections/suggestions proposed by the objector, in the abovementioned sections, and would request the Hon'ble Commission to consider the projections shared by Discoms, considering the justifications shared on the same.

	<p>B. Disallow the Discoms their true up claims for the year 2019-20, 2020-21 and 2021-22 in the face of non-filing of ARR and Tariff Proposals for the relevant years and set an authority for utilities to operate within the stipulated timelines and not on its own whims to unnecessarily burden the consumers.</p> <p>C. Notwithstanding Prayer B, allow the following Prayers:</p> <p>D. Direct the Discoms to submit supporting documents against claiming escalation in Variable charge;</p> <p>E. Direct the Discoms to strictly adhere to Market MCP in order to determine the rate for transaction of power in the power exchange market;</p> <p>F. Direct Discoms to strictly adhere to Hon'ble Commission past directives;</p> <p>G. Disallow the power purchase cost as per the Objector's Assessment and in cases where the purchase has been projected at exorbitantly high price not relatable to the incumbent market situations;</p> <p>H. Pass necessary orders as may be deemed appropriate in the facts and circumstances of the case in the interest of justice;</p> <p>I. 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.</p>	
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Replies to the Objections/Suggestions raised on ARR & FPT including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 for Retail Supply Business by Sri I. Gopinath, Chief Executive Officer, South Indian Cement Manufacturers' Association, Administrative Office, 3rd Floor, 36th Square, Plot no.481, Road No. 36, Jubilee Hills, Hyderabad-500034.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>STATEMENT OF OBJECTIONS</p> <p>The Distribution Licensees namely Southern Power Distribution Company of Telangana Limited and Northern Power Distribution Company of Telangana Limited (hereinafter referred to as the 'Discoms' or 'TS Discoms' or 'Petitioners' or 'distribution companies' or 'Licensees') have filed the Petitions for Power Purchase True up for FY 2016-17 to FY 2022-23 for the Retail Supply Business 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>These filings have been taken on record by Hon'ble Commission from O.P. No.82 of 2022 to O.P. No. 88 of 2022 for TSSPDCL and from O.P. No. 89 of 2022 to O.P. No. 95 of 2022 for TSNPDCL</p> <p>This Statement of Objections is being filed on behalf of 'The South Indian Cement Manufacturers' Association (SICMA)', an Association registered under Telangana Societies Registration Act 2001 at Hyderabad, its members being major Cement Manufacturers across South India (hereinafter called the —'Objector'. The main function of SICMA is to promote and protect the interests of its members in relation to the commerce & industries of India and in particular, the commerce & industries connected with cement. The members of the association are availing power supply from the licensees across the State of Telangana, predominantly at 132/220 KV voltage and few of them avail supply at 33 KV voltage.</p>	No Comments

	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.	
	The South Indian Cement Manufacturers' Association (Objector) strongly objects to the Filing of the ARR for the Retail Supply Business for FY 2022-2023 respectively (herein after referred to as the 'Tariff Petitions' or 'Petitions') and prays that the submissions and objections made herein may be accepted and approved by the Hon'ble Commission, in the interest of justice and equity	TS Discoms submit that the instant Petitions viz. O.P. No.80 of 2022 to O.P. No. 81 of 2022 for TSNPDCL & TSSPDCL deals about the ARR for the Retail Supply Business for FY 2023-2024 respectively.
	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. The brief facts, propositions, analysis, grounds and point wise objections to the Petitions are narrated herein below:	No Comments
1	AVERAGE COST OF SUPPLY (2022-23 VS 2023-24) i. In the instant Petitions, Licensees have projected a higher average cost of service than the approved in last Retail Supply order for the FY 2022-23. A comparison of the Average Cost of Supply (ACoS) claimed against that approved by Hon'ble Commission in the FY 2022-23 and also the provisional data for FY 2023-24 is shown below:	T The actual ACoS for FY 2021-22 for Telangana state is Rs. 7.32/kWh. The ARR projections by TS Discoms are done based on the actuals of FY 2021-22 and H1 of FY 2022-23 and estimated figures for H2 of FY 2022-23. Hence the projected ACoS for Telangana state for FY 2023-24 i.e., Rs. 7.33/kWh is only 0.1% increase over actual ACoS of FY 2021-22. Moreover, the Distribution cost and Transmission cost for FY 2023-24 which are components of ACoS were taken from the Distribution MYT Order for 4 th Control Period and Transco Transmission MYT Order for 4 th Control Period both approved by Hon'ble TSERC. The Distribution cost for FY 2023-24 is increased by 12% over the distribution cost approved by Hon'ble TSERC for FY 2022-23 and the Transmission cost for FY 2023-24 is also



increased by 12% over the approved numbers for FY 2022-23.
Hence the overall ACoS for Telangana for FY 2023-24 has increased by 4% over FY 2022-23.

ii. It is humbly pointed out from the charts that Licensees have projected an increase of around 4-6 % in the Average Cost of Supply (ACoS) for FY 2023-24 over the approved figure for FY 2022-23 respectively.

2 AGGREGATE REVENUE REQUIREMENT (ARR) CLAIMED BY TELANGANA DISCOMS FOR FY 2023-24

i) The TSSPDCL and TSNPDCL has projected an Annual Revenue Requirement of Rs. 36,963.20 Crores and Rs. 17,095.16 Crores respectively for FY 2023-24. The ARR along with its treatment proposed by the TSSPDCL and TSNPDCL is provided in the table below:

Particulars	TSSPDCL	TSNPDCL	TOTAL
Transmission Cost	2,670.27	1,126.29	3,796.56
SLDC Cost	32.81	13.69	46.50
Distribution Cost	5,168.36	4,081.42	9,249.78
PGCIL & ULDC Expenses	1,081.98	451.19	1,533.17
Network and SLDC Cost (A)	8,953.42	5,672.60	14,626.02

No Comments

Power Purchase / Procurement Cost	27,654.99	11,310.21	38,965.20
Interest on Consumer Security Deposits	311.96	81.08	393.04
Supply Margin in Retail Supply Business	42.83	31.27	74.10
Other Costs if any	-	-	-
Supply Cost (B)	28,009.78	11,422.56	39,432.34
Aggregate Revenue Requirement (A+B)	36,963.20	17,095.16	54,058.35
Non-Tariff Income	28.18	33.81	61.98
Net Revenue Requirement	36,935.02	17,061.35	53,996.37
Total Revenue	33,724.37	9,737.70	43,462.07
Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)	33,521.34	9,737.70	43,259.04
Revenue from Cross Subsidy Surcharge	100.80	-	100.80
Revenue from Additional Surcharge	102.23	-	102.23
Revenue Deficit(-)/Surplus(+) at Current Tariffs	-3,210.64	-7,323.65	-10,534.30
Government Subsidy u/s 65 of the Electricity Act, 2003	-	-	-
Net gap – Deficit(-)/Surplus(+)	-3,210.64	-7,323.65	-10,534.30

	<p>ii) The Objections in respect of the ARR projected by the Petitioners for FY 2023-24 are summarised below:</p>																																	
<p>3</p>	<p>SALES PROJECTIONS:</p> <p>i) The Petitioners, in the instant petitions have escalated sales quantum for HTIV (A) Lift Irrigation & Agriculture at 132 kV for FY 2023-24 by 108%-298% against over the estimated values of FY 2022-23:</p> <table border="1" data-bbox="262 488 1230 651"> <thead> <tr> <th>TSSPDCL</th> <th>FY 22</th> <th>FY 23</th> <th>FY 24</th> </tr> <tr> <th>HT Category at 132 KV</th> <th>Actuals</th> <th>Estimates</th> <th>Estimates</th> </tr> </thead> <tbody> <tr> <td>HT-IV A Lift Irrigation & Agriculture (MUs)</td> <td>1877.73</td> <td>1821.45</td> <td>3786.40</td> </tr> <tr> <td>Percentage Increase (%)</td> <td></td> <td>-3%</td> <td>108%</td> </tr> </tbody> </table> <table border="1" data-bbox="262 711 1230 873"> <thead> <tr> <th>TSNPDCL</th> <th>FY 22</th> <th>FY 23</th> <th>FY 24</th> </tr> <tr> <th>HT Category at 132 KV</th> <th>Actuals</th> <th>Estimates</th> <th>Estimates</th> </tr> </thead> <tbody> <tr> <td>HT-IV A Lift Irrigation & Agriculture (MUs)</td> <td>1792.65</td> <td>932.08</td> <td>3712.74</td> </tr> <tr> <td>Percentage Increase (%)</td> <td></td> <td>-48%</td> <td>298%</td> </tr> </tbody> </table>	TSSPDCL	FY 22	FY 23	FY 24	HT Category at 132 KV	Actuals	Estimates	Estimates	HT-IV A Lift Irrigation & Agriculture (MUs)	1877.73	1821.45	3786.40	Percentage Increase (%)		-3%	108%	TSNPDCL	FY 22	FY 23	FY 24	HT Category at 132 KV	Actuals	Estimates	Estimates	HT-IV A Lift Irrigation & Agriculture (MUs)	1792.65	932.08	3712.74	Percentage Increase (%)		-48%	298%	
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	<p>ii) The Petitioners have submitted that the reason for such increase is as follows: <i>“Lift Irrigation (LI) Schemes: The Telangana government has initiated the ambitious Kaleshwaram lift irrigation project along with the existing ones, to meet the needs of the agriculture consumers in the State. The growth trend in this category has many variations due to variations in the operation of Lift Irrigation pumps based on rainfall, water levels in reservoirs, etc. The sales in H1 of FY22-23 recorded a negative growth rate due to heavy rains in monsoon period. Further, due to heavy floods in August month the LIS pumps are not operated in H1 of FY 2022-23. Licensee has considered the expected additional loads and energy requirement for FY 2023-24 based on the information received from the I&CAD, which was further duly analyzed and moderated considering the</i></p>	<p>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>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 & Godavari river and upcoming additional loads. These loads are further</p>																																

	<i>licensee's experience of the historical consumption along with other allied factors."</i>																																								
	<p>iii) However, it is submitted that the project status of Kaleshwaram lift irrigation project is uncertain and that the high projections made by the Petitioners for Lift Irrigation category are highly optimistic. This can be inferred from several articles in LiveLaw and Hindustan Times that there is uncertainty regarding the fate of the Kaleshwaram lift irrigation project. The same have been annexed herewith as Annexure-II.</p>	<p>considered to be operating only at a 60% load factor by I&CAD department. However, TS Discoms, based on their analysis and historical experience have only considered half (50%) of the projections given by I&CAD department for HT 132 KV LIS category.</p> <p>Hence, the objector's computation of requirement by considering lesser LIS sales is not correct.</p>																																							
	<p>iv) Therefore, the Objector has recomputed the power purchase requirement for FY 2023-24 by considering the actuals sales corresponding to HT IV (A) category in FY 2021-22:</p> <table border="1" data-bbox="247 659 1230 1263"> <thead> <tr> <th colspan="3">Power Purchase Requirement (MUs) for FY 2023-24 as per Objector</th> </tr> <tr> <th>Particulars</th> <th>TSSPDCL</th> <th>TSNPDCL</th> </tr> </thead> <tbody> <tr> <td>Total Sales, MU</td> <td>50,444.21</td> <td>19,345.26</td> </tr> <tr> <td>Sales (LT, 11kV, 33kV) (MU)</td> <td>42,049.43</td> <td>16,213.63</td> </tr> <tr> <td>EHT Sales (MU)</td> <td>8,394.78</td> <td>3,131.63</td> </tr> <tr> <td>Total Losses, MU</td> <td>6,593.90</td> <td>2,752.89</td> </tr> <tr> <td>Distribution System Losses (MU)</td> <td>4,478.42</td> <td>1,927.25</td> </tr> <tr> <td>Transmission System Losses (MU)</td> <td>2,115.49</td> <td>825.63</td> </tr> <tr> <td>Total Losses, (%)</td> <td>11.56</td> <td>12.46</td> </tr> <tr> <td>Transmission Losses (%)</td> <td>3.71</td> <td>3.74</td> </tr> <tr> <td>Distribution System Losses (%)</td> <td>9.63</td> <td>10.62</td> </tr> <tr> <td>Input to Distribution System</td> <td>46,527.85</td> <td>18,140.88</td> </tr> <tr> <td>Power Purchase Requirement (MU)</td> <td>57,038.11</td> <td>22,098.15</td> </tr> </tbody> </table>	Power Purchase Requirement (MUs) for FY 2023-24 as per Objector			Particulars	TSSPDCL	TSNPDCL	Total Sales, MU	50,444.21	19,345.26	Sales (LT, 11kV, 33kV) (MU)	42,049.43	16,213.63	EHT Sales (MU)	8,394.78	3,131.63	Total Losses, MU	6,593.90	2,752.89	Distribution System Losses (MU)	4,478.42	1,927.25	Transmission System Losses (MU)	2,115.49	825.63	Total Losses, (%)	11.56	12.46	Transmission Losses (%)	3.71	3.74	Distribution System Losses (%)	9.63	10.62	Input to Distribution System	46,527.85	18,140.88	Power Purchase Requirement (MU)	57,038.11	22,098.15	
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4	<p>POWER PURCHASE COST:</p> <p>A. TSGENCO Thermal Power Stations:</p>																																								

<p>i) It is submitted that the fixed cost recovery of thermal generating stations is based on the availability declared by them i.e. Plant Availability Factor (PAF).</p>	<p>Projecting Fixed charges as per net availability by considering Plant load factor as given by objector is incorrect. TSDISCOMS projected the Fixed Charges of TSGENCO Thermal Stations as per Hon'ble TSERC approved TS GENCO MYT Order for 4th Control period and Variable charges by considering the base ECR rate computed by the Hon'ble Commission in 4th Control Period.</p>
<p>ii) The latest TSGENCO Tariff Order for 4th control period was issued on 22.03.2022 and the Fixed Charges for FY 2023-24 has been approved subjected to normative plant availability.</p>	
<p>iii) The Petitioner has claimed the complete fixed charges for TSGENCO stations as approved in TSGENCO MYT order dt. 22.03.2022 without showing any linkage with plant availability nor submitted any details about the same. Further, in this regard it is important to mention that since no true-up has been conducted for TSGENCO stations after FY 2019, hence it cannot be ascertained if the actual availability of the TSGENCO stations has been up to the normative level to enable complete fixed charge recovery as approved by the Hon'ble TSERC.</p>	
<p>iv) Additionally, TS Discoms has considered the capacity allocation from YTPS Unit I & II for FY 2023-24. The units YTPS I and YTPS II are expected to be commissioned on 1st Dec 2023 and 1stFeb 2024. The Hon'ble commission in its TSGENCO MYT order dt. 22.03.2022 has directed the TSGENCO to submit the proposal for determination of capital cost and Tariff for YTPS. The relevant extract and directive issued from the TSGECO MYT order dt. 22.03.2022 are reproduced below for reference:</p> <p><i>5.3.36 The Commission has discussed capital cost and capitalisation schedule of BTPS in detail in the subsequent Chapter of this Order. However, it is to be noted that the Commission has approved the capitalisation of BTPS only from the CoD of the Station as against the submission of TSGenco. Hence, the capitalisation approved for BTPS is from FY 2020-21 against the capitalisation submitted by TSGenco for FY 2019-20. The Commission noted that TS Genco submitted the <u>capital investment for YTPS (new station) in the Capital Investment Plan; however, TSGenco has not sought determination of capital cost & tariff for YTPS in the</u></i></p>	<p>The TS Discoms have considered the projections for availability of power quantum and the cost of power purchase from YTPS units 1 & 2 as per the Commissioning Dates as communicated by TS Genco in consultation with CMD Genco & Transco in November 2022 (during ARR & FPT filing).</p> <p>Hence, the YTPS Unit 1 availability is considered from Dec'22 and YTPS Unit 2 availability is considered from Feb'23 and the fixed cost and variable costs for these months were considered as received from TS Genco.</p>

<p><u>Petition. Therefore, the Commission has not considered the approval of capital cost for YTPS while approving the investment plan for FY 2019-20 to FY 2023-24. The Commission directs TSGenco to submit the proposal for determination of capital cost and Tariff for YTPS before its CoD as per the Regulations No.1 of 2019.</u></p> <p>"New Directives</p> <p>6. Scheme-wise Details of Capital Cost for New Stations</p> <p><i>The Commission directs TS Genco to submit the proposal for final capital cost and revised tariff for BTPS after commissioning of the final unit. The Commission also directs TS Genco to submit the proposal for determination of capital cost and Tariff for YTPS before its CoD as per the Regulations No.1 of 2019. TS Genco shall submit the scheme-wise capitalisation for new plants, viz., KTPS-VII, BTPS and YTPS with Financial Package, Time and Cost over-run for each station along with proper quantification of the cost over-run, justification for the time over-run and Financial Package-wise undischarged liabilities as on COD of the respective plant while filing the MTR Petition."</i></p>	
<p>v) To the best of our knowledge, the MTR filing dt. 30.11.2022 made by TSGENCO and information available on TSGENCO website do not provide any details/status about the YTPS capital cost approval and Tariff determination. Even the commissioning date of the units are in Dec'23 and Feb' 24.</p>	
<p>vi) In light of the above, the Objector has not considered any power procurement (MUs) from YTPS for computation of power purchase cost for FY 2023-24.</p>	
<p>vii) The detailed computation of Fixed cost for TSGENCO thermal station for both discoms as per Objector's Assessment is shown below:</p> <p>Disallowance Proposed in Fixed cost of TSGENCO Thermal as per Objector's Assessment</p>	

(All Figures in Crores)

Particulars	TSSPDCL	TSNPDCL	Total
Petitioner's Claim	4,004.21	1,671.49	5,675.70
Objector Assessment	3,439.16	1,435.60	4,874.76
Disallowance Proposed	565.05	235.89	800.94

TS Discoms have responded to the item-wise objections/suggestions 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.

Station	Plant Capacity	Net Availability	Normative Availability to be Considered as per Objector	Energy Dispatch	Fixed Cost approved in Tariff Order	Fixed Cost as per Petitioner	Fixed Cost as per Objector's Assessment
	MW	%	%	MU	INR Crore	INR Crore	INR Crore
TSGENCO Thermal							
KTPS D	500	73.00%	80.00%	3,197.39	381.03	381.03	347.69
KTPS Stage VI	500	74.00%	80.00%	3,250.14	517.45	517.46	478.64
RTS B	62.5	68.00%	80.00%	370.60	117.35	117.34	99.75
Kakatiya Thermal	500	74.00%	80.00%	2,796.89	416.04	416.03	384.84

Power Plant Stage I								
Kakatiya Thermal Power Plant Stage II	600	75.00%	80.00%	3,921.2 2	710.49	710.48	666.08	
BTPS - unit 1	270	78.00%	80.00%	1,844.5 7	473.55	473.55	461.71	
BTPS - unit 2	270	78.00%	80.00%	1,844.5 7	473.55	473.55	461.71	
BTPS - unit 3	270	78.00%	80.00%	1,844.5 7	473.55	473.55	461.71	
BTPS - unit 4	270	78.00%	80.00%	1,844.5 7	473.55	473.55	461.71	
Yadradri - TPS - I	800	79.00%	NA	1,841.1 8	NA	400.80	-	
Yadradri - TPS - II	800	79.00%	NA	905.50	NA	200.40	-	
KTPS VII	800	81.00%	80.00%	5,659.5 3	1,037. 97	1,037. 97	1,050.94	
Total TSGENCO Thermal	564 2.5			29,320 .74	5,074. 52	5,675. 70	4,874.78	
B. Central Generating Stations:								
i. It is pointed out that the Hon'ble Commission has not considered any capacity allocation from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. For FY 2023-24 in line with the earlier directions of the Commission in RST Orders for FY								

2017-18 and FY 2018-19. The relevant extracts from the past RST orders have been reproduced below for reference:

The Hon'ble Commission in its RST Order dt. 26.08.2017 for FY 2017-18 has stated as follows:

"3.3.17 To reduce the financial burden upon them, the Licensees submitted a requisition to Gol expressing its willingness to surrender the share of Telangana State from NTECL Vallur TPS. In view of the requisition made by the Licensees, the Commission also observes that NLC Tamil Nadu Power Ltd. is also a similar project with high cost of generation. The Commission thus directs the DISCOMs to surrender the allocated share of Telangana State in NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. Hence the Commission in this Order, has not considered the energy availability from these generating stations from 01.08.2017 onwards."

(Emphasis supplied)

The Hon'ble Commission in its RST Order dt. 27.03.2018 for FY 2018-19 has stated as follows:

"3.3.18 The Commission in its Tariff Order for FY 2017-18 dated 26.08.2017 directed the DISCOMs to surrender the allocated share of Telangana State in NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. and accordingly, had not considered the energy availability from these stations from 01.08.2017. The DISCOMs submitted that in response to their request for re-allocation of the share of Telangana State in NTECL Vallur TPS, there is no confirmation from the Ministry of Power, Gol to that effect. The DISCOMs also submitted that the re-allocation of the share in NLC Tamil Nadu Power Ltd. will be taken up after the re-allocation of share in NTECL Vallur TPS. The Commission observed that the DISCOMs are procuring power from NTECL Vallur TPS and NLC Tamil Nadu

The projection of availability and cost for the CGS generators (NTECL Vallur TPS and NLC Tamil Nadu Power Ltd) are based on the allocation by **Central Govt.** and availability received from respective power plant.

The Licensees submitted a requisition to MOP, Gol expressing its willingness to **surrender** the share of Telangana State from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. and it is under process.

PowerLtd. in FY 2017-18 and have proposed in FY 2018-19 also. In light of the directions in the Tariff Order for FY 2017-18, the Commission has not considered the share allocation to Telangana State from NTECLVallur TPS and NLC Tamil Nadu Power Ltd. for FY 2018-19.

(Emphasis supplied)

ii) The Hon'ble Commission in its RST order dt.23.03.2022 for FY 2022-23 has approved Power Purchase as follows by disallowing any Power Procurement from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd.:

Table 4-15 Power procurement cost from Central Generating Stations for FY 2022-23

Source	Claimed				Approved			
	Quantum MU	Fixed Cost Rs.crore	Variable Cost Rs.crore	Total Rs.crore	Quantum MU	Fixed Cost Rs.crore	Variable Cost Rs.crore	Total Rs.crore
Thermal								
NTPC Ramagundam Stage I & II	2683.01	188.60	690.63	879.22	2716.15	181.22	699.16	880.38
NTPC Ramagundam Stage III	721.42	57.15	182.20	239.35	729.22	53.89	184.17	238.06
NTPC Talcher TPS II	1638.93	117.79	284.28	402.07	1598.29	110.39	277.23	387.62
NTPC Simhadri Stage I	2251.89	478.57	707.56	1186.13	3672.35	356.75	1153.88	1510.63
NTPC Simhadri Stage II	1298.23	230.24	398.51	628.75	1765.35	245.11	541.91	787.02
NTPC Kudgi	1017.12	319.88	348.05	667.92	1751.40	294.24	599.31	893.55
NLC TPS II Stage I	395.60	27.08	104.54	131.63	385.93	28.10	101.99	130.09
NLC TPS II Stage II	710.07	50.12	187.82	237.95	692.64	52.26	183.21	235.47
NNTPP	402.72	68.24	88.03	156.28	392.73	78.22	85.84	164.06
TSTPP Unit 1	3499.63	790.92	794.42	1585.33	3412.84	711.82	774.72	1486.54
NTECL Vallur TPS	834.63	135.00	245.48	380.48	0.00	0.00	0.00	0.00
NLC Tamil Nadu Power Ltd.	1068.60	188.57	283.77	472.34	0.00	0.00	0.00	0.00
Sub Total	16521.83	2652.16	4315.29	6967.45	17116.91	2112.01	4601.41	6713.42
Nuclear								

iii) Despite clear past directives/methodology of the Hon'ble Commission, the TS Discoms have sought to procure power from these stations. It is humbly requested that the Hon'ble Commission may penalise the Discoms for not adhering to the directives specified.

<p>iv) The Objector in line with the Hon'ble Commission past followed methodology/directives has not considered any capacity allocation from these two generating stations for power purchase computation. It is prayed that the Hon'ble TSERC may do the same.</p>	
<p>C. Interest on Pension bonds: i) The Petitioners i.e. TSSPDCL & TSNPDCL have claimed an amount of Rs. 972.86 Crores and Rs. 406.11 Crores respectfully towards interest on Pension bonds for FY 2023-24.</p>	<p>No Comments</p>
<p>ii) It is a set principle that pension funds have to be maintained from the contributions of the management & employees and should be used appropriately to earn interest thereon. iii) It is inappropriate to load the inefficiency of erstwhile APSEB in managing funds on the end consumers in the form interest on Pension Bonds.</p>	
<p>iv) The Hon'ble Commission in its TSGENCO MYT Order dt. 22.03.2022 has also acknowledged the same i.e. additional burden of pension bonds should be funded by the Government of Telangana. The Hon'ble Commission Directive as per order dt. 22.03.2022 in this regard is reproduced below:</p> <p><i>"New Directives</i> 10. Liabilities on pension bonds The Commission directs TS Genco to extract the request of the stakeholder that the Government of Telangana shall bear the additional burden of pension bonds and communicate to the <i>Principal Secretary, Energy, GoTS for favourable consideration."</i> (Emphasis supplied)</p>	

	<p>v) Therefore, it is prayed that the claim of the Petitioners towards Interest on Pension Bonds may be disallowed and may be borne by the Government of Telangana.</p>																
	<p>D. Sale of Surplus Power: i) The Objector, after assessing the actual power purchase requirement for both discoms for FY 2023-24 (same has been discussed in detail in section 4 pertaining to sales projection in this report) and despatching the power in an economical manner has worked out the actual surplus/deficit (MUs) scenario for FY 2023-24.</p>	<p>TS Discoms have not considered any sale of surplus power in FY 2023-24 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>ii) For computation purpose following parameters discussed above are taken in consideration: i) Zero Despatch from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd; ii) Zero Capacity allocation from YTPS I & II; iii) Economical Power despatch in accordance to reduced power purchase requirement.</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 2016-17 to FY 2022-23, have already been submitted to the Hon'ble Commission, as part of the Additional information requested.</p>															
	<p>iii) Taking into account the above, the Objector has computed the actual overall energy scenario for FY 2023-24:</p> <table border="1" data-bbox="220 824 1241 1294"> <thead> <tr> <th data-bbox="220 824 898 915">Particulars for FY 2023-24</th> <th data-bbox="898 824 1094 915">TSSPDCL</th> <th data-bbox="1094 824 1241 915">TSNPDCL</th> </tr> </thead> <tbody> <tr> <td data-bbox="220 915 898 1006">Energy Availability (MUs)</td> <td data-bbox="898 915 1094 1006">65,750.47</td> <td data-bbox="1094 915 1241 1006">28,056.71</td> </tr> <tr> <td data-bbox="220 1006 898 1097">Energy Requirement (MUs)</td> <td data-bbox="898 1006 1094 1097">55,100.32</td> <td data-bbox="1094 1006 1241 1097">21,289.25</td> </tr> <tr> <td data-bbox="220 1097 898 1188">Surplus/deficit (MUs)</td> <td data-bbox="898 1097 1094 1188">10,650.14</td> <td data-bbox="1094 1097 1241 1188">6,767.46</td> </tr> <tr> <td data-bbox="220 1188 898 1294">Average of MCP for FY 22 and H1 of FY 23 (Rs/kWh)</td> <td data-bbox="898 1188 1094 1294">5.17</td> <td data-bbox="1094 1188 1241 1294">5.17</td> </tr> </tbody> </table>	Particulars for FY 2023-24	TSSPDCL	TSNPDCL	Energy Availability (MUs)	65,750.47	28,056.71	Energy Requirement (MUs)	55,100.32	21,289.25	Surplus/deficit (MUs)	10,650.14	6,767.46	Average of MCP for FY 22 and H1 of FY 23 (Rs/kWh)	5.17	5.17	<p>The calculation of the objector regarding the overall energy scenario is not correct for the following reasons:</p> <p>i. Zero Despatch from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd; - As responded in above section, until the surrender request for share allocated by Central Govt is not finalized, TS Discoms cannot project zero dispatch from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd.</p> <p>ii. Zero capacity allocation from YTPS -</p>
Particulars for FY 2023-24	TSSPDCL	TSNPDCL															
Energy Availability (MUs)	65,750.47	28,056.71															
Energy Requirement (MUs)	55,100.32	21,289.25															
Surplus/deficit (MUs)	10,650.14	6,767.46															
Average of MCP for FY 22 and H1 of FY 23 (Rs/kWh)	5.17	5.17															

Revenue generated by Sale of Surplus Power (Rs. Crores)	5,503.19	3,496.91	iii. Economical power desptch – The Energy requirement projections made by the objector are incorrect as they have projected lesser sales for LIS category.							
iv) The Summary of Disallowances in Power Purchase Cost as per the Objector’s Assessment is summarized below:										
Power Purchase Cost as per Petitioner's Claim										<p>TS Discoms have gone through the detailed computations done by the objector in their Annexures.</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 2023-24, 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 FY2023-24, 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.</p>
Particulars	State			TSSPDCL			TSNP DCL			
	2023-24			2023-24			2023 -24			
	PP MU	PP Cost (INR Cr.)	PP Cost (INR/k Wh)	PP MU	PP Cost (INR Cr.)	PP Cost (INR/k Wh)	PP MU	PP Cost (INR Cr.)	PP Cost (INR/k Wh)	
<i>TSGENCO Thermal</i>	29,320.74	13,418.89	4.58	20,685.78	9,467.03	4.58	8,634.96	3,951.86	4.58	
<i>TSGENCO Hydel</i>	5,414.41	1,317.51	2.43	3,819.87	929.50	2.43	1,594.54	388.01	2.43	
<i>CGS stations</i>	22,809.96	10,151.81	4.45	16,013.11	7,162.11	4.47	6,796.85	2,989.71	4.40	
<i>APGPCL</i>	-	-	-	-	-	-	-	-	-	
<i>IPPs (Thermal)</i>	2,650.58	2,207.19	8.33	1,869.99	1,557.17	8.33	780.60	650.02	8.33	

	<i>Power Tech)</i>									
	NCES	11,959.28	5,187.70	4.34	8,006.78	3,574.00	4.46	3,952.50	1,613.70	4.08
	Singareni I & II	1,098.04	759.82	6.92	-	-	-	1,098.04	759.82	6.92
	Thermal Power Tech	2,630.44	1,820.21	6.92	2,630.44	1,820.21	6.92	-	-	-
	CSPGCL	2,009.88	783.85	3.90	-	-	-	2,009.88	783.85	3.90
	Thermal Power Tech Unit II	4,814.85	1,877.79	3.90	4,814.85	1,877.79	3.90	-	-	-
	Other Short Term Sources	135.56	61.46	4.53	95.64	43.36	4.53	39.92	18.10	4.53
	D-D purchase/sale	-	-	3.02	814.52	250.96	3.08	-814.52	250.96	3.08
	Interest on Pension Bonds	-	1,378.97	-	-	972.86	-	-	406.11	-

	Total PP Cost	82,843.75	38,965.20	4.70	58,750.98	27,654.99	4.71	24,092.77	11,310.21	4.69
	Sale of Surplus Power	-	-	-	-	-	-			
	Net PP Cost	82,843.75	38,965.20	4.70	58,750.98	27,654.99	4.71	24,092.77	11,310.21	4.69
Power Purchase Cost as per Objector's Assessment										
Particulars	State			TSSPDCL			TSNPDCL			
	2023-24			2023-24			2023-24			
	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)	
<i>TSGENCO Thermal</i>	26,574.06	11,829.61	4.45	18,748.00	8,345.81	4.45	7826.06	3,483.81	4.45	
<i>TSGENCO Hydel</i>	5,414.41	1,317.51	2.43	3,819.87	929.50	2.43	1,594.54	388.01	2.43	
<i>CGS stations</i>	19,748.98	9,134.20	4.63	14,792.83	6,288.66	4.25	4,956.15	2,845.55	5.74	
<i>APGPCL</i>	-	-	-	-	-	-	-	-	-	
<i>IPPs (Thermal)</i>	2,496.65	2,207.19	8.84	1,869.99	1,557.17	8.33	626.67	650.02	10.37	

<i>Power Tech)</i>										
NCES	11,959.28	5,187.70	4.34	8,006.78	3,574.00	4.46	3,952.50	1,613.70	4.08	
Singareni I & II	1,098.04	759.82	6.92	-	-	-	1,098.04	759.82	6.92	
Thermal Power Tech	2,137.86	1,663.13	7.78	2,137.86	1,663.13	7.78	-	-	#DIV/0!	
CSPGCL	2,009.88	783.85	3.90	-	-	-	2,009.88	783.85	3.90	
Thermal Power Tech Unit II	4,814.85	1,877.79	3.90	4,814.85	1,877.79	3.90	-	-	#DIV/0!	
Other Short Term Sources	135.56	61.46	4.53	95.64	43.36	4.53	39.92	18.10	4.53	
D-D purchase/sale	-	106.13	-	814.52	350.49	4.30	-814.52	-244.36	3.00	
Interest on Pension Bonds	-	-	-	-	-	-	-	-	-	

	Total PP Cost	76,389.58	34,928.40	4.57	55,100.32	24,629.90	4.47	21,289.25	10,298.49	4.84	
	Sale of Surplus Power	-17,417.60	-8,999.67	-	-10,650.14	-5,502.93	5.17	-6,767.46	-3,496.75	5.17	
	Net PP Cost	58,971.98		4.57	44,450.18	19,126.98	4.30	14,521.79	6,801.75	4.68	
	Particulars		Disallowances in Power Purchase Cost claimed by the Petitioners as per Objector's Assessment (INR Crores)								
			State	TSSPDCL	TSNPDCL						
	<i>TSGENCO Thermal</i>		-1,589.28	-1,121.22	-468.06						
	<i>TSGENCO Hydel</i>		-	-	-						
	<i>CGS stations</i>		-1,017.61	-873.45	-144.16						
	<i>APGPCL</i>		-	-	-						
	<i>IPPs</i>		-	-	-						
	<i>NCEs</i>		-	-	-						
	<i>Singareni I & II</i>		-	-	-						
	<i>Thermal Power Tech</i>		-157.08	-157.08	-						
	<i>CSPGCL</i>		-	-	-						
	<i>Thermal Power Tech Unit II</i>		-	-	-						
	<i>Other Short Term Sources</i>		-	-	-						
	<i>D-D purchase/ sale</i>		106.13	99.53	6.61						
	<i>Interest on Pension Bonds</i>		-1,378.97	-972.86	-406.11						

		Total PP Cost	-4,036.81	-3,025.09	-1,011.72	
		Sale of Surplus Power	-8,999.67	-5,502.93	-3,496.75	
		Net PP Cost	-13,036.48	-8,528.01	-4,508.47	
	V) Hence, it is prayed that the Hon'ble Commission may allow the Power Purchase cost of Rs. 25,928.72 Crores for FY 2023-24 as per Objector's Assessment.					
5	NON-TARIFF INCOME:					
	i) TSSPDCL and TSNPDCL have claimed NTI towards Retail Supply Business to the tune of Rs. 28.18 Crores and Rs. 33.81 Crores for FY 2023-24, 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.					The details of Non-tariff income as per audited accounts and the segregation of accounts between distribution and retail supply business for FY 2021- 22 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 2022- 23and FY 2023-24are clearly mentioned under para no. 5.2 of Chapter – 5 and para no. 6.2 of chapter 6 in the ARR & Tariff Proposals of TSSPDCL and TSNPDCL respectively. 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.
	ii) As per the latest available Audited Accounts of Q1 & Q2 for FY 2022-23 pertaining to TSSPDCL and TSNPDCL, the NTI booked for Retail Business is Rs. 70.20 Crores and Rs. 127.33 Crores respectively which are far more than the projected NTI.					
	iii) Assuming the overall NTI on the basis of the latest Audited Accounts for both Discoms, the Objector has arrived at Rs. 265.29 Crores as NTI for both Discoms for FY 2023-24 for Retail Supply Business.					
	Objector Assessment of Non-Tariff Income for FY 2023-24					
	<i>(All Figures in Rs. Crores)</i>					
		TSSPDCL		TSNPDCL		Total
	Non-Tariff Income	Actuals H1	Objector's Assessment	Actuals H1	Objector's Assessment	Actuals H1 Objector's Assessment

Particulars	2022-23	2023-24	2022-23	2023-24	2022-23	2023-24
As per accounts (A)	70.20	155.94	69.49	137.96	139.69	293.90
Projected by the Petitioner(B)	-	28.18	-	33.81	-	61.99
Balance understated by Petitioner(A-B)	-	-127.76	-	-104.15	-	-231.91
iv) It is respectfully submitted that the Hon'ble Commission may align the NonTariff incomes strictly in line with the audited accounts as per Objector's Assessment and reduce it from the ARR being approved.						
GOVERNMENT OF TELANGANA SUBSIDY:						
i) The Average Cost of Supply (ACoS) as approved in the RST tariff order dt. 23.03.2022 for FY 2022-23 is Rs. 6.80/kWh for TSSPDCL and Rs. 7.57/kWh for TSNPDCL..						
ii) The Average Cost of Supply (ACoS) as computed by the Objector for FY 2023-24 is Rs. 5.61/kWh for TSSPDCL and Rs. 6.44/kWh for TSNPDCL.						
iii) Considering the actual sales to subsidised category of consumers and the average cost to serve, the cost of supplying power to subsidised categories for each discom is worked out. It is observed that there is an additional subsidy requirement of Rs.						
The ACoS calculated by the objector is not correct because they have omitted/ estimated lesser cost for certain items and considered lower sales (mainly by considering lower LIS sales) and the Discoms' responses for the same are already mentioned in above sections.						
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.						

6,018.47 Crores and Rs. 5,367.15 Crores for TSSPDCL and TSNPDCL respectively for FY 2023-24.

iv) The computations for the same are provided in the tables below: **Subsidy requirement for TSSPDCL for FY 2023-24**

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)	10,547.46	5.61	5,912.95	5,775.11	137.84
LT Agriculture	10,590.92	5.61	5,937.32	56.69	5,880.63
Total	21,138.39		11,850.27	5,831.80	6,018.47

Subsidy requirement for TSNPDCL for FY 2023-24

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	$E = C - D$

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

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

	LT (Domestic)	4,234.41	6.44	2,724.85	1,999.52	725.34	
	LT Agriculture	7,290.39	6.44	4,691.39	49.57	4,641.81	
	Total	11,524.79		7,416.24	2,049.09	5,367.15	
<p>*Note: The ACoS as computed by the Objector has been provided in the forthcoming sections.</p>							
	<p>v) The Objector humbly submits that the Hon'ble Commission may consider the shortfall of subsidy receivable from the State of Telangana for FY 2023-24 and allow the same in the instant proceedings towards the ARR for FY 202324 in line with the Section 65 of the Electricity Act, 2003.</p>						
	<p>8 URGENT NEED FOR CROSS SUBSIDY AND TARIFF RATIONALIZATION: i) The Objector submits 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.</p>						
	<p>ii) The National Tariff Policy, 2016 stipulates that the cross-subsidy levels are to be kept within the permissible range of $\pm 20\%$ of the Cost of Supply. It is submitted that the Hon'ble Appellate Tribunal for Electricity (Hon'ble APTEL or Hon'ble Tribunal) has taken cognizance of this and given the following as part of its Findings and Analysis in its Judgement dt. 18.02.2022 in Appeal No. 248 of 2018 (Annexed herewith as Annexure-I): <i>"27. We are inclined to record here that State Commission has miserably failed in complying with the directions passed by this Tribunal in various Judgements but</i></p>						
	<p>TS Discoms have proposed for retaining the tariffs as per the Tariff Order for FY 2022-23 for the ensuing year FY 2023-24 except few proposals/modifications like</p> <ul style="list-style-type: none"> • revision of tariff for LT VII B Wholly Religious Places and introduction of new category for HT wholly religious places, • Green Tariff for all Tariff categories, • introduction of Grid Support charges / Parallel Operation Charges 						
	<p>TS Discoms have not proposed for any change in tariff rates except above-mentioned cases and would abide by the directions of Hon'ble Commission in this regard.</p>						

also failed to implement the provisions of the Tariff Policy, 2016 which clearly mandates that:

“Clause 8.3(2)

- a) **Separate consumer tariff at each voltage level has to be determined in order to fulfil the mandate of Section 61(g) of the Electricity Act 2003, which is to reflect actual cost of supply;**
- b) Separate consumer tariff at each voltage level is required in order to ascertain the actual cross subsidies built in a consumer's tariff;
- c) Without specifying a separate consumer tariff for consumers connected at each voltage level, a progressive reduction in actual cross subsidies is not possible as the said component is not known;
- d) **The retail/ effective tariff or average billing rate at a particular voltage level cannot exceed more than 20% of the actual cost of supply of a distribution licensee at the said voltage level.**

...

29. In the light of the foregoing paragraphs, it is clear that this Tribunal has, time and again, been consistently held that the State Commissions have to necessarily determine voltage wise tariff depending upon different category of consumers, and the principle of which has also been upheld by the Hon'ble Supreme Court in Punjab State Power Corpn. Ltd. v. Punjab State Electricity Regulatory Commission, (2015) 7 SCC 387 as stated above.

(Emphasis supplied)

iii) Despite such clear mandate from the Hon'ble APTEL and the National Tariff Policy, 2016, the Objector submits that the tariff approved in the RST Order for FY 2022-23 dt. 23.03.2022 has increased the Cross-subsidy level % beyond the permissible range of $\pm 20\%$ as per the Tariff Policy, 2016:

Category	FY 2022-23				
	Sales submitted in Petition (MUs)	Revenue submitted in Petition (Rs. Crores)	ABR (Rs./ kWh)	CoS approved in RST Order for FY23 (Annexure-9) (Rs./kWh)	ABR /Co S (%)
LT Category	12,862.79	3,512.49	2.73		-
Category I (A&B) - Domestic	4,006.42	1,901.08	4.75	7.76	61%
Category II (A,B,C & D) - Non-domestic/Commercial	896.35	1,022.03	11.40	7.46	153%
Category III - Industrial	238.40	224.62	9.42	7.46	126%
Category IV (A&B) - Cottage Industries & Dhobighats	8.54	4.17	4.88	9.76	50%
Category V (A&B) - Irrigation and Agriculture	7,290.39	47.11	0.06	8.34	1%

Category VI (A & B) - Local Bodies, St. Lighting & PWS	359.88	255.68	7.10	9.74	73%
Category VII (A & B) - General Purpose	55.01	48.06	8.74	9.74	90%
Category VIII - Temporary Supply	7.68	9.60	12.49	11.65	107%
Category IX Electric Vehicle Charging Stations	0.13	0.14	10.89	-	0%
HT Category at 11 KV	2,328.96	1,792.31	7.70		-
HT-I Industry Segregated	1,023.79	982.63	9.60	9.13	105%
HT-I (B) Ferro-Alloys	-	-	-	-	-
HT-II - Others	170.28	197.53	11.60	9.55	121%
HT-III Airports, Railways and Bustations	7.69	7.79	10.13	8.25	123%
HT-IVA Lift Irrigation & Agriculture	22.69	25.43	11.21	6.27	179%

HT - IV (B) Composite P.W.S Schemes	151.52	92.71	6.12	6.27	98%
HT-VI Townships and Residential Colonies	8.62	7.59	8.81	12.22	72%
HT -VII Temporary Supply	25.34	37.49	14.80	8.55	173%
HT- VIII RESCO (Siricilla)	919.03	441.14	4.80	6.48	74%
HT-IX Electric Vehicle Charging Stations	-	-	-	10.52	-
HT Category at 33 KV	567.72	422.28	7.44		-
HT-I Industry Segregated	149.71	135.02	9.02	5.96	151%
HT-I (B) Ferro- Alloys	20.87	15.47	7.41	4.72	157%
HT-II - Others	6.72	8.55	12.73	6.67	191%
HT-III Airports, Railways and Bustations	-	-	-	-	-
HT-IVA Lift Irrigation &Agriculture	14.82	19.54	13.18	5.12	257%

HT - IV (B) Composite P.W.S Schemes	342.68	209.15	6.10	5.12	119%
HT-VI Townships and Residential Colonies	26.54	23.44	8.83	5.82	152%
HT -VII Temporary Supply	6.37	11.11	17.44	7.11	245%
TSSNPDCCL	FY 2022-23				
Category	Sales submitted in Petition (MUs)	Revenue submitted in Petition (Rs. Crores)	ABR (Rs./ kWh)	CoS approved in RST Order for FY23 (Annexu re-9) (Rs./kW h)	ABR /Co S (%)
HT-IX Electric Vehicle Charging Stations	-	-	-	-	-
HT Category at 132 KV	2,267.81	1,909.58	8.42		-

HT-I Industry Segregated & HMWSSB	675.89	490.05	7.25	5.29	137%
HT-I (B) Ferro-Alloys	-	-	-	-	-
HT-II - Others	5.53	12.42	22.48	10.50	214%
HT-III Airports, Railways and Bustations	-	-	-	-	-
HT-IVA Lift Irrigation & Agriculture	932.08	967.69	10.38	6.44	161%
HT - IV (C) Composite P.W.S Schemes	26.77	16.34	6.10	6.44	95%
HT-V (A) Railway Traction	523.11	338.70	6.47	5.30	122%
HT-V (B) HMR	-	-	-	-	-
HT-VI Townships and Residential Colonies	103.31	82.92	8.03	4.85	165%
HT -VII Temporary Supply	1.12	1.46	12.96	-	0%
HT-IX Electric Vehicle	-	-	-	-	-

Charging Stations					
Total	18,027.28	7,636.66	4.24	7.57	56%

TSSPDCL		FY 2022-23			
Category	Sales submitted in Petition (MUs)	Revenue submitted in Petition (Rs. Crores)	ABR (Rs. /kWh)	CoS approved in RST Order for FY23 (Annexure-8) (Rs./kWh)	ABR/CoS (%)
LT Category	25,658.95	10,418.55	4.06		-
Category I (A&B) - Domestic	9,977.86	5,468.40	5.48	6.82	80%
Category II (A,B,C & D) - Non-domestic/Commercial	3,050.42	3,477.00	11.40	6.53	175%
Category III - Industrial	933.39	857.92	9.19	6.59	139%

Category IV (A&B) - Cottage Industries & Dhobighats	9.50	4.49	4.73	6.43	74%
Category V (A&B) - Irrigation and Agriculture	11,032.21	54.98	0.05	8.38	1%
Category VI (A & B) - Local Bodies, St. Lighting & PWS	470.19	360.10	7.66	6.40	120%
Category VII (A & B) - General Purpose	89.37	76.84	8.60	7.43	116%
Category VIII - Temporary Supply	95.70	118.54	12.39	9.31	133%
Category IX Electric Vehicle Charging Stations	0.30	0.27	8.95	6.16	145%
HT Category at 11 KV	6,570.40	6,643.99	10.11		-
HT-I Industry Segregated	4,189.20	4,003.72	9.56	7.64	125%
HT-I (B) Ferro-Alloys	0.41	0.35	8.58	-	0%
HT-II - Others	1,868.19	2,134.95	11.43	7.36	155%

TSSPDCL	FY 2022-23				
Category	Sales submitted in Petition (MUs)	Revenue submitted in Petition (Rs. Crores)	ABR (Rs. /kWh)	CoS approved in RST Order for FY23 (Annexure-8) (Rs./kWh)	ABR/CoS (%)
HT-III Airports, Railways and Bustations	4.66	4.83	10.38	7.19	144%
HT-IVA Lift Irrigation & Agriculture	40.28	33.61	8.34	6.38	131%
HT - IV (B) Composite P.W.S Schemes	142.17	87.08	6.12	6.38	96%
HT-VI Townships and Residential Colonies	174.38	153.60	8.81	8.13	108%
HT -VII Temporary Supply	146.10	222.66	15.24	8.55	178%
HT- VIII RESCO (Siricilla)	-	-	-	-	-

HT-IX Electric Vehicle Charging Stations	5.02	3.19	6.36	9.50	67%
HT Category at 33 KV	7,499.69	6,618.43	8.82		-
HT-I Industry Segregated	5,960.88	5,199.72	8.72	5.76	151%
HT-I (B) Ferro-Alloys	54.86	43.58	7.94	4.57	174%
HT-II - Others	1,042.40	1,038.55	9.96	5.92	168%
HT-III Airports, Railways and Bustations	-	-	-	-	-
HT-IVA Lift Irrigation & Agriculture	15.18	16.83	11.09	5.53	201%
HT - IV (B) Composite P.W.S Schemes	263.89	161.03	6.10	5.53	110%
HT-VI Townships and Residential Colonies	121.46	103.36	8.51	5.78	147%
HT -VII Temporary Supply	41.03	55.36	13.49	5.84	231%
HT-IX Electric Vehicle	-	-	-	-	-

Charging Stations						
HT Category at 132 KV	7,245.29	5,308.14	7.33			-
HT-I Industry Segregated & HMWSSB	4,205.45	3,086.48	7.34	5.01		146%
HT-I (B) Ferro-Alloys	229.55	183.70	8.00	4.34		184%
HT-II - Others	45.91	44.94	9.79	5.25		186%
HT-III Airports, Railways and Bustations	54.20	47.24	8.72	4.11		212%
HT-IVA Lift Irrigation & Agriculture	1,821.45	1,399.91	7.69	5.76		133%
HT - IV (C) Composite P.W.S Schemes	268.84	164.00	6.10	5.76		106%
HT-V (A) Railway Traction	527.97	317.91	6.02	5.07		119%
HT-V (B) HMR	91.93	63.96	6.96	4.73		147%
HT-VI Townships and Residential Colonies	-	-	-	-		-

HT -VII Temporary Supply	-	-	-	-	-
HT-IX Electric Vehicle Charging Stations	-	-	-	-	-
Total	46,974.33	28,989.11	6.17	6.80	91%

(The orange-highlighted cells indicate the instances where the Average Billing Rate (as submitted in the instant petitions) due to tariff approved in RST Order dt. 23.03.2022, is less than the permissible 80% of the Cost of Supply approved for that category in RST Order dt. 23.03.2022. The pinkhighlighted cells indicate the instances where the Average Billing Rate (as submitted in the instant petitions) due to tariff approved in RST Order dt. 23.03.2022, is greater than the permissible 120% of the Cost of Supply approved for that category in RST Order dt. 23.03.2022.

iv) The Petitioner has proposed to continue with the same tariff as was approved in the RST Order dt. 23.03.2022, with minor modifications for certain categories.

v) The Objector has already demonstrated that such tariff determined is not in accordance to the Hon'ble APTEL's Judgement dt. 18.02.2022 in Appeal No. 248 of 2018, the National Tariff Policy, 2016, and in turn, the Electricity Act, 2003.

vi) Therefore, the Objector prays that the Hon'ble TSERC may rationalize, revise, and approve the tariff schedule such that the tariff determined for each category does not exceed more than 20% of the actual cost of supply of a distribution licensee at the said voltage level, in strict accordance to the Hon'ble APTEL's Judgement dt.

18.02.2022 in Appeal No. 248 of 2018, the National Tariff Policy, 2016, and in turn, the Electricity Act, 2003.

SUMMARY OF OBJECTOR'S ASSESSMENT OF ALLOWABLE ARR FOR FY 2023-24

i) The ARR as per Objector's assessment vs Petitioner's submission are provided below:

Summary of ARR for TSSPDCL for FY 2023-24

(All figures in Rs. Crores)

Particulars	Petitioner's Claim	Objector's Assessment	Disallowance
Transmission Cost	2,670.27	2,670.27	-
SLDC Cost	32.81	32.81	-
Distribution Cost	5,168.36	5,168.36	-
PGCIL & ULDC Expenses	1,081.98	1,081.98	-
Network and SLDC Cost (A)	8,953.42	8,953.42	-
Power Purchase / Procurement Cost	27,654.99	19,126.98	8,528.01
Interest on Consumer Security Deposits	311.96	311.96	-
Supply Margin in Retail Supply Business	42.83	42.83	-
Other Costs if any	-	-	-

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 submitted by Discoms, considering the justifications shared on the same.

Supply Cost (B)	28,009.78	19,481.76	8,528.01
Aggregate Revenue Requirement (A+B)	36,963.20	28,435.18	8,528.01
Non-Tariff Income	28.18	155.94	-127.76
Net Revenue Requirement	36,935.02	28,164.27	8,770.74
Sales (MU)	52,352.87	50,444.21	1,908.66
ACoS (Rs./kWh)	7.06	5.61	1.45
Total Revenue	33,724.37	32,394.69	
Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)	33,521.34	32,191.65	1,329.69
Revenue from Cross Subsidy Surcharge	100.80	100.80	-
Revenue from Additional Surcharge	102.23	102.23	-
Revenue Deficit(-)/Surplus(+) at Current Tariffs	-3,210.64	4,115.44	-7,326.09
Government Subsidy u/s 65 of the Electricity Act, 2003		6,018.47	-6,018.47
Net gap – Deficit(-)/Surplus(+)	-3,210.64	10,133.91	-13,344.56

Summary of ARR for TSNPDCL for FY 2023-24

(All figures in Rs. Crores)

Particulars	Petitioner's Claim	Objector's Assessment	Disallowance
Transmission Cost	1,126.29	1,126.29	-
SLDC Cost	13.69	13.69	-

Distribution Cost	4,081.42	4,081.42	-
PGCIL & ULDC Expenses	451.19	451.19	-
Network and SLDC Cost (A)	5,672.60	5,672.60	-
Power Purchase / Procurement Cost	11,310.21	6,801.75	4,508.47
Interest on Consumer Security Deposits	81.08	81.08	-
Supply Margin in Retail Supply Business	31.27	31.27	-
Other Costs if any	-	-	-
Supply Cost (B)	11,422.56	6,914.10	4,508.47
Aggregate Revenue Requirement (A+B)	17,095.16	12,586.69	4,508.47
Non-Tariff Income	33.81	137.96	-104.15
Net Revenue Requirement	17,061.35	12,448.74	4,612.61
Sales (MU)	21,265.36	19,345.26	1,920.10
ACoS (Rs./kWh)	8.02	6.44	1.59
Total Revenue	9,737.70	8,331.27	
Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)	9,737.70	8,331.27	1,406.43
Revenue from Cross Subsidy Surcharge	-	-	-
Revenue from Additional Surcharge	-	-	-

Revenue Deficit(-)/Surplus(+) at Current Tariffs	-7,323.65	-4,117.47	-3,206.18
Government Subsidy u/s 65 of the Electricity Act, 2003	-	5,367.15	-5,367.15
Net gap – Deficit(-)/Surplus(+)	-7,323.65	1,249.68	-8,573.33

Summary of ARR for Telangana State for FY 2023-24

(All figures in Rs. Crores)

Particulars	Petitioner's Claim	Objector's Assessment	Disallowance
Transmission Cost	3,796.56	3,796.56	-
SLDC Cost	46.50	46.50	-
Distribution Cost	9,249.78	9,249.78	-
PGCIL & ULDC Expenses	1,533.17	1,533.17	-
Network and SLDC Cost (A)	14,626.02	14,626.02	-
Power Purchase / Procurement Cost	38,965.20	25,928.72	13,036.48
Interest on Consumer Security Deposits	393.04	393.04	-
Supply Margin in Retail Supply Business	74.10	74.10	-
Other Costs if any	-	-	-
Supply Cost (B)	39,432.34	26,395.86	13,036.48
Aggregate Revenue Requirement (A+B)	54,058.35	41,021.88	13,036.48
Non-Tariff Income	61.99	293.90	-231.91

	Net Revenue Requirement	53,996.36	40,727.98	13,268.39	
	Sales (MU)	73,618.23	69,789.47	-	
	ACoS (Rs./kWh)	7.33	5.82	1.52	
	Total Revenue	43,462.07	40,725.95	-	
	Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)	43,259.04	40,522.92	2,736.12	
	Revenue from Cross Subsidy Surcharge	100.80	100.80	-	
	Revenue from Additional Surcharge	102.23	102.23	-	
	Revenue Deficit(-)/Surplus(+) at Current Tariffs	-10,534.29	-2.03	-10,532.27	
	Government Subsidy u/s 65 of the Electricity Act, 2003	-	11,385.62	-11,385.62	
	Net gap – Deficit(-)/Surplus(+)	-10,534.29	11,383.59	-21,917.88	
	ii) 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.				
	iii) It is prayed that the Hon'ble Commission may allow tariff reduction accordingly.				
	PROPOSED CROSS SUBSIDY SURCHARGE				
	i) The Objector prays that the Hon'ble Commission may rationalize the tariffs for industrial consumers and consequently, the cross subsidy surcharge in adherence to the mandate of the National Tariff Policy, 2016. The relevant extract of the National Tariff Policy, 2016 is reproduced below: <i>"8.3 Tariff design: Linkage of tariffs to cost of service</i>				Under the purview of Hon'ble TSERC. TS Discoms would abide by the directions of Hon'ble TSERC in this regards.

...

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

...

Surcharge formula:

...

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

(Emphasis supplied)

ii) Further, it is prayed that the Hon'ble Commission may not exceed the upper limit of allowable Cross-Subsidy Surcharge to Rs. 1.35/kWh and Rs. 1.54/kWh for TSSPDCL and TSNPDCL respectively for FY 2023-24 as computed by the Objector:

(All figures in Rs./kWh)

Discoms	ACoS as per Objector's Assessment	Maximum Tariff	Maximum CSS
	A	B = 1.2 x A	C = 0.2 x B
TSSPDCL	5.61	6.73	1.35
TSNPDCL	6.44	7.72	1.54

PARALLEL OPERATION CHARGES/ GRID SUPPORT CHARGES:

i) The Petitioners in their instant Petitions have again sought the introduction of Parallel Operation Charges/Grid Support Charges (GSC). The relevant extract of the Petition is reproduced below:

The detailed analysis and reasons for levy of Grid Support Charges by TS Discoms is already submitted to the Grid Co-Ordination Committee (GCC) and TS Discoms have

<p><i>“The licensee proposes 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: ...”</i></p>	<p>presented their views and analysis to all the stakeholders during the past GCC meetings with the stakeholders.</p> <p>TS Discoms mentioned that it is inevitable to levy the Grid Support Charges for the benefits availed by the generators during parallel operation with the grid and the gain to the Captive Power Plant is quite substantial in case there is grid support.</p>
<p>ii) It is submitted that the Petitioners had claimed Parallel Operation Charges/Grid Support Charges (GSC) in the previous year’s petitions as well. However, the Hon’ble Commission in its RST Order dt. 23.03.2022 had not allowed the same and had made the following directive:</p> <p><i>“Commission’s view 6.25.5 The stakeholders have vehemently opposed the DISCOMs proposal of GSC. The stakeholders have also raised certain issues purported to be incorrectness in the rationale provided by the DISCOMs. The stakeholders have also requested the Commission to undertake third party analysis before deciding on the levy of GSC as well as the quantum of such GSC. The Commission finds merit in the stakeholders’ suggestion to undertake a detailed study. 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.”</i></p> <p style="text-align: right;">(Emphasis supplied)</p>	<p>After due consultations with the stakeholders and study of methodologies in other states, TS Discoms modified the methodology for levy of Grid Support Charges and proposed the modified Grid Support Charges/ Parallel Operation Charges in the ARR & FPT petition for FY 2023-24.</p> <p>Hence, TS Discoms request Hon’ble Commission to consider the same and approve the levy of Grid Support Charges.</p>

	<p>iii) It is submitted that the Petitioners claim for Parallel Operation Charges/Grid Support Charges (GSC) in the instant petitions have not provided detailed study made by the Grid Coordination Committee. In the absence of the same, it is prayed that the Hon'ble Commission may disallow the claim of the Petitioners towards Parallel Operation Charges/Grid Support Charges (GSC).</p>	
	<p>PRAYERS: The Objector most respectfully prays that this Hon'ble Commission may be pleased to:</p> <ul style="list-style-type: none"> 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 purchase has been projected at exorbitantly high price not relatable to the incumbent market situations; C. Align the Non-Tariff incomes strictly in line with the Audited Accounts and reduce it from the ARR being approved; D. Adjust the subsidy shortfall from the Govt. of Telangana as per Objector's Assessment for FY2023-24; E. 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 2023-24; F. Approve the ARR by considering the total subsidy as prayed and assessed by the Objector in the detailed Objections Statement; 	<p>TS Discoms have responded to the item-wise objections/suggestions proposed by the objector, in the abovementioned sections, and would request the Hon'ble Commission to consider the projections shared by Discoms, considering the justifications shared on the same</p>

	<ul style="list-style-type: none">G. 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;H. Disallow the proposed revenue from proposed tariffs as claimed by the Petitioner;I. Allow Cross Subsidy Surcharge as per the mandates of the National Tariff Policy 2016;J. Disallow the claim of the Petitioners' towards Parallel Operation Charges/Grid Support Charges (GSC);K. Pass necessary orders as may be deemed appropriate in the facts and circumstances of the case in the interest of justice;L. 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.	
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Replies to the Objections/Suggestions raised on Power Purchase true-up from FY 2016-17 to FY 2022-23 (Prov) for Retail Supply Business by Sri I. Gopinath, Chief Executive Officer, South Indian Cement Manufactures' Association, Administrative Office, 3rd Floor, 36th Square, Plot no.481, Road No. 36, Jubilee Hills, Hyderabad-500034.

S.No.	Summary of Objections / Suggestions	Response of the Licensee																																													
1	<p>ABSENCE OF CONSOLIDATED WORKING EXCEL MODEL:</p> <p>The Licensees have not provided the consolidated working excel model along with the Power Purchase Tariff Petitions for FY 2016-17 to FY 2022-23, the absence of which, hinders the process of stakeholder commentary as well as prudence check process of the Hon'ble Commission.</p>	<p>TS Discoms along with the Power Purchase true up Petitions have submitted Annexures which details the station wise approved and actual power purchase cost. As part of the Additional Information requested by the Hon'ble Commission, TS Discoms have submitted the working models for year wise Power Purchase True-up calculations to the Hon'ble Commission</p>																																													
2	<p>POWER PURCHASE TRUE UP CLAIMED BY TELANGANA DISCOMS FOR FY 2016-17 TO FY 2022-23:</p> <p>i) The TSSPDCL and TSNPDCL has projected a True up amount of Rs. 9,060.80 Crores and Rs. 2,954.47 Crores respectively for the period from FY 2016-17 to FY 2022-23. The Power Purchase True up Claim along with its treatment proposed by the TSSPDCL and TSNPDCL is provided in the table below:</p> <p>TRUE UP CLAIMED BY PETITIONERS FOR FY 2016-17 TO FY 2022-23</p> <p align="right">(Rs.Crores)</p> <table border="1"> <thead> <tr> <th>TSSPDCL</th> <th>FY 17</th> <th>FY 18</th> <th>FY 19</th> <th>FY 20</th> <th>FY 21</th> <th>FY 22</th> <th>FY 23</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>PP True up/ (True Down)</td> <td>1,588.32</td> <td>936.04</td> <td>3,799.05</td> <td>3,900.32</td> <td>3,230.80</td> <td>6,372.00</td> <td>1,270.39</td> <td>21,096.92</td> </tr> <tr> <td>Additional Support by GoTS</td> <td>1,583.83</td> <td>908.79</td> <td>1,680.00</td> <td>1,400.00</td> <td>-</td> <td>-</td> <td>-</td> <td>5,572.62</td> </tr> <tr> <td>Loss Funding</td> <td>235.01</td> <td>392.48</td> <td>1,241.82</td> <td>2,470.12</td> <td>2,124.00</td> <td>-</td> <td>-</td> <td>6,463.43</td> </tr> <tr> <td>Net True Up/(True Down)</td> <td>-230.52</td> <td>-365.23</td> <td>877.23</td> <td>30.20</td> <td>1,106.80</td> <td>6,372.00</td> <td>1,270.39</td> <td>9,060.87</td> </tr> </tbody> </table>	TSSPDCL	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22	FY 23	Total	PP True up/ (True Down)	1,588.32	936.04	3,799.05	3,900.32	3,230.80	6,372.00	1,270.39	21,096.92	Additional Support by GoTS	1,583.83	908.79	1,680.00	1,400.00	-	-	-	5,572.62	Loss Funding	235.01	392.48	1,241.82	2,470.12	2,124.00	-	-	6,463.43	Net True Up/(True Down)	-230.52	-365.23	877.23	30.20	1,106.80	6,372.00	1,270.39	9,060.87	<p>No comments</p>
TSSPDCL	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22	FY 23	Total																																							
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TSNPDCL	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22	FY 23	Total
PP True up/ (True Down)	715.91	672.26	1,216.55	1,752.02	1,710.43	2,417.81	-369.10	8,115.88
Additional Support by GoTS	678.79	389.48	720.00	600.00	-	-	-	2,388.27
Loss Funding	75.42	156.05	762.86	558.15	1,220.18	-	-	2,772.66
Net True Up/(True Down)	-38.30	126.73	-266.31	593.87	490.25	2,417.81	-369.10	2,954.95

Both Discoms	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22	FY 23	Total
PP True up/ (True Down)	2,304.23	1,608.30	5,015.60	5,652.34	4,941.23	8,789.81	901.29	29,212.80
Additional Support by GoTS	2,262.62	1,298.27	2,400.00	2,000.00	-	-	-	7,960.89
Loss Funding	310.43	548.53	2,004.68	3,028.27	3,344.18	-	-	9,236.09
Net True Up/(True Down)	-268.82	-238.50	610.92	624.07	1,597.05	8,789.81	901.29	12,015.82

ii) The Objections in respect of the True up claim made by the Petitioners from FY 2016-17 to FY 2022-23 are summarised below:

3	NON-ADHERENCE TO STATUTORY TIMELINES FOR ARR FILING AS PER REGULATIONS FOR FY2019-20, FY2020-21 AND FY2021-22 BY TELANGANA DISCOMS:	For FY 2018-19, TSSPDCL on behalf of both the Discoms had requested the Hon'ble Commission for additional time for submission of ARR citing the reasons for the same and the
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Financial Year	Timeline for ARR Filing as per Regulations	Application filed for Condonation of Delay	Date of Actual ARR filed by TS Discoms	Reason submitted for non-adherence to statutory timelines
2018-19	By 30.11.2017	N/A	ARR Petition on 15.12.2017 Tariff Proposals on 21.12.2017	N/A
2019-20	By 30.11.2018	I.A. No.03 of 2019 filed in O.P. No. 21 & 22 of 2017	31.03.2021*	Relevant extracts of Commission's Interim Order dt. 06.11.2019 produced herein: <i>"Whereas TSDISCOMs have filed petition for extension of time for filing of ARR & Tariff proposals along with additional surcharge and cross subsidy surcharge for FY 2019-20 for retail supply business and ARR & Tariff proposals for distribution business for 4th MYT control period (FY 2019-20 to FY 2023-24) by 31.03.2019, in view of certain difficulties faced by the Discoms."</i>
Financial Year	Timeline for ARR Filing as per Regulations	Application filed for Condonation of Delay	Date of Actual ARR filed by TS Discoms	Reason submitted for non-adherence to statutory timelines

Hon'ble Commission vide Lr.No.S/R.O-1/4/R.O.1/D.No.723 Dated:05.12.2017 condoned the delay in filing the ARR for FY 2018-19.

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:

- Enforcement of Model Code of Conduct in the State of Telangana in view of elections for Telangana Assembly.
- 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.
- Enforcement of Model Code of Conduct in the State of Telangana from 10.03.2019 till 23.05.2019 (Lok Sabha election).
- Pending information from I&CAD department on Lift Irrigation (LI) schemes.
- 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.
- Issuance of model code of conduct for the Municipal elections from 23.12.2019 to 25.01.2020
- Further extension in view of preparation of tariff proposals in accordance to the MoP recommendations on Tariff Rationalisation process.
- 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.
- Enforcement of Model Code of Conduct from 17th Nov 2020 to 4th Dec 2020 in view of GHMC elections.
- 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

					<p><i>"The licensee humbly submits before the Hon'ble Commission that the licensee is in the process of finalizing the ARR, tariff proposals, cross subsidy surcharge and additional surcharge proposals for FY 201920". (Para 2)</i></p>	<p>impact on the demand projections and overall ARR respectively.</p> <p>However, ARR for FY 2019-20, FY 2020-21, FY 2021-22 were submitted before the Hon'ble Commission 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>As also pointed out by the Objector, TS Discoms have been seeking timely extension on tariff filing from the Hon'ble Commission on the grounds mentioned above.</p> <p>In view of the above reasons, TS Discoms request the Hon'ble Commission to consider the True-up Petitions filed by them.</p>
2020-21	By 30.11.2019	I.A. No.08 of 2020 filed in O.P. No. 21 & 22 of 2017, filed on 29.02.2020.	31.03.2021*	<p>Relevant extracts of Commission's Interim Order dt. 20.03.2020 produced herein:</p> <p>"Whereas, TSDISCOMs have filed miscellaneous petition on 29.02.2020 seeking extension of for filing of ARR & tariff proposals, cross subsidy surcharge and additional surcharge for FY 2020 – 21 for retail supply business till 31.03.2020 as the finalisation of lift irrigation demand projections and rationalisation of tariffs is in progress which finalisation is very crucial in submission of for and</p>		

				ARR & tariff proposals for FY 2020–21. The licensee submits that the licensee is in the process of finalising the ARR, tariff proposals, cross subsidy surcharge and additional surcharge proposals for retail supply business to FY 2020 – 21”.	
202 1- 2022	By 30.11.2020	I.A. No.4 of 2021 filed in O.P. No. 21 & 22 of 2017, filed on 08.03.2021.	31.03.20 21*	Relevant extracts of Commission’s Interim Order dt. 27.03.2021 produced herein: <i>“Further, Model Code of Conduct has come into force from 11.02.2021 in view of Biennial Elections to Telangana State Legislative Council and it will be in existence till 22.03.2021”.</i>	
<p>*Note-1: Petition rejected by TSERC vide Order dt. 22.12.2021 in O.P. (SR) No. 14 of 2021 & O.P. (SR) No. 15 of 2021 on account of the Petition not being accompanied by FPT for FY 2021-22 in derogation of Regulation No. 5 of 2005. Furthermore, the time period for which they sought was already lapsed.</p>					

	<p>*Note-2:It is pertinent to note that the Discoms have only undertaken ARR and Tariff Proposal for FY 2022-23 only pursuant to the Hon'ble Commission's direction in s Order dated 18.09.2020 in O.P.No.23 of 2020.</p> <p>1. The Telangana Discoms have failed to meet the regulatory requirements of timely filing of ARR for FY 2019-2020, FY 2020-21, and FY 2021-22, leading to the accumulation of abnormal (alleged) true-up gaps, which the TS Discoms seek to pass on to the consumers in FY 2023-24.</p> <p>2. It is submitted that the TS Discoms ought not be allowed to recover the entire amount in True-up while it has continued to make a mockery of the relevant laws and regulations.</p>	
	A.	
	<p>3. A preliminary analysis of the ARR filings undertaken by the Discoms for the ARR, Tariff proposal and True-up for FY 2019-20, 2020-21 and 2021-22 indicates gross violation of the following provisions of:</p> <p style="padding-left: 40px;">B. APERC (Terms and Conditions for determination of Tariff for Wheeling and Retail Supply of Electricity) Regulation No. 04 of 2005;</p> <p style="padding-left: 40px;">C. APERC Regulation No. 01 of 2014;</p> <p style="padding-left: 40px;">D. APERC Conduct of Business Regulations, 2015; Electricity Act, 2003</p>	TS Discoms have replied to the detailed objections of the Objector in following replies:
	<p>4. APERC (Terms and Conditions for determination of Tariff for Wheeling and Retail Supply of Electricity) Regulation No. 04 of 2005:</p>	
	4.1 Non-submission Power Procurement Plans by Discoms for Control Period FY 2019-2024:	TS Discoms submit that they have undertaken activities for submission of Power Procurement Plan for the 4 th Control Period FY 2019-20 to FY 2023-24.However, on account of

<p>As per Regulation 12.1 of Regulation No. 04 of 2005, a Discoms shall be allowed to recover the cost of Power it procures for supply to consumers based on the Commission-approved Power Procurement Plan covering each year of the Control Period. Accordingly, the Discoms should be disallowed from recovering the entire Power Purchase cost in true-up when the Power Procurement Plans for each financial year of the Control Period itself has not been timely filed for the Hon'ble Commission's approval.</p>	<p>the same reasons for which the ARR and Tariff Petitions for FY 2019-20, FY 2020-21 and FY 2021-22 were delayed, TS Discoms were not able to file the Power Procurement Plan.</p>
<p>4.2 It is pertinent to reproduce the extract of the Hon'ble Commission's Order dt. 29.04.2020 pertaining to ARR and Wheeling Tariffs for Distribution Business for 4th Control Period (FY 2019-20 to FY 2023-24) for TSSPDCL and TSNPDCL: <i>"Commission's Views</i></p> <p><i>3.5.14 Regulation No.4 of 2005 stipulates the Distribution Licensees to file their Resource Plans on 1st April of the year preceding the first year of the Control Period. The Resource Plan shall inter-alia contain the sales forecast, load forecast, power procurement plan, and Distribution Plan (Capital Investment Plan) consistent with the requirements of the Commission's Guidelines on Load Forecast and Resource Plan (Distribution Plan and Power Procurement Plan). Further, the Resource Plan as approved by the Commission shall be adopted by the Distribution Licensees in their Multi-Year and Annual filings for the Control Period.</i></p> <p><i>3.5.15 The Resource Plans for 4th Control Period from FY 2019-20 to FY 2023-24 and 5th Control Period from FY 2024-25 to FY 2028-29 was to be filed on 01.04.2018. The DISCOMs have filed their Resource Plans for 4th Control Period on 31.10.2018. In the Resource Plans submitted, the DISCOMs stated that the formulation of power</i></p>	

	<p><i>procurement plan in coordination with various generators is under process and the same shall be submitted at an early date. In replies to stakeholders' comments, the DISCOMs submitted that the power procurement plan would be submitted shortly. The DISCOMs have not submitted the power procurement plan in compliance with the Guidelines. Further, the DISCOMs in seeking extension of time for filing of MYT Petitions for 4th Control Period cited the reasons of finalisation of annual accounts and non-receipt of information of Lift Irrigation schemes from Irrigation Department.</i></p> <p><i>3.5.16 The Commission is of the considered view that as the filing of MYT Petitions for 4th Control Period has already been delayed, further delay on determination of MYT for 4th Control Period is undesirable for want of approval of Resource Plans. The DISCOMs have submitted their Capital Investment Plans for 4th Control Period in the instant Petitions. On prudence check of the same, the Commission has approved the Capital Investment Plan for 4th Control Period in this Order as detailed in Chapter 5."</i></p>	
	<p>5. APERC Regulation No. 01 of 2014:</p> <p>5.1 As per the preamble appended to this Regulation, in view of the complexities involved in forecasting the Sales and Revenue Requirement of Retail Supply Business, on the behest of the TS Discoms themselves, the TS Discoms were allowed to file ARR and Tariff Proposals on an annual basis.</p>	<p>T TS Discoms submit that the Hon'ble Commission has rightfully admitted the complexities involved in forecasting the Sales and Revenue Requirement of Retail Supply Business and accordingly has allowed to file ARR and Tariff Proposals on an annual basis till now.</p>
	<p>5.2 It is noteworthy to mention that the cost of power procurement constitutes around 75% of total cost of ARR and since the quantum of variation on account of the same each year may be high, henceforth vide this Regulation, cost recovery was provided on an annual basis with a view to neither burden the consumers nor the Licensee.</p>	

<p>5.3 It is evident from the Table above, that the TS Discoms are in clear cut violation of the APERC Regulation No. 01 of 2014 on account of non-filing of complete ARR and Tariff Proposals for FY 2019-20, FY 2020-21 and FY 2021-2022, and now wishes to claim entire variation on account of power purchase cost in True-up of aforementioned period on the basis of ARR determined for FY 2018-19.</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"> • Enforcement of Model Code of Conduct in the State of Telangana in view of elections for Telangana Assembly. • 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. • Enforcement of Model Code of Conduct in the State of Telangana from 10.03.2019 till 23.05.2019 (Lok Sabha election). • Pending information from I & CAD department on Lift Irrigation (LI) schemes. • 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. • Issuance of model code of conduct for the Municipal elections from 23.12.2019 to 25.01.2020 • Further extension in view of preparation of tariff proposals in accordance to the MoP recommendations on Tariff Rationalisation process. • 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. • Enforcement of Model Code of Conduct from 17th Nov 2020 to 4th Dec 2020 in view of GHMC elections. • 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.
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		<p>As also pointed out by the Objector, TS Discoms have been seeking timely extension on tariff filing from the Hon'ble Commission on the grounds mentioned above.</p> <p>In view of the above reasons, TS Discoms request the Hon'ble Commission to consider the True up Petitions filed by them.</p>
	5.4 It is pertinent to mention the limited scope of Regulation 1 of APERC Regulation No. 01 of 2014: <i>"This Regulation will only be applicable as long as the Tariff for Retail Supply Business is filed on an annual basis"</i> .	
	5.5 Since, the Discoms have failed to undertake annual filing of ARR for FY 2019-20, FY 2020-21, and FY 2021-2022, accordingly their true-up claims with respect to power purchase cost variation are liable to be rejected.	
	<p>6. Regulation 24 of the Conduct of Business Regulations, 2015 and Section 94 of EA 2003:</p> <p>6.1 Regulation 24 of the Conduct of Business Regulations, 2015 and Section 94 of EA 2003, empowers the Hon'ble Commission to pass such interim Orders as it deems fit in accordance with the Act. However, there is a mandate on the Commission under Section 86 of EA 2003 to ensure <i>transparency</i> in exercise of its functions and powers.</p>	<p>TS Discoms would like to state that it is unfair on the part of the objector to question the intent of the Hon'ble Commission on performing its statutory duties. TS Discoms have made submissions explaining the reasons for delay in submission of the ARR and tariff filings for FY 2019-20 to FY 2021-22 to the Hon'ble Commission and the Hon'ble Commission after considering the same and after being satisfied only has issued interim Orders to extend the tariff approved for FY 2018-19 to the period from FY 2019-20 to FY 2021-22.</p>
	6.2 From the relevant TSERC's Order as encapsulated in the Table above, it is apparent that the Discoms have failed to provide any concrete rationale for its inability to file ARR and Tariff Proposals. Any communication on the subject between the Discom and Commission is also not available for public scrutiny;	
	6.3 In such interim Proceedings, neither there were any Respondents, nor any Stakeholders involved. There is nothing to indicate as to why there was even a	

<p>need of extension by the Discoms in filing of the ARR for FY 2019-2020; 2020-2021 and 2021-22 in order to assess the veracity of the Discom's claims and why the same was subsequently allowed</p>	
<p>6.4 Further, the TS Discoms even failed to provide a time period by which they expected to fulfil the ARR and Tariff filings for the relevant years as an apparent attempt to evade the regulatory mandates and timelines;</p>	<p>TS Discoms submit that timelines stipulated for various activities as per the regulatory framework could not be followed on account of the consequent events which are themselves the reasons submitted by the TS Discoms in the above reply.</p>
<p>6.5 The ARR and Tariff Proposals for a particular FY are to be filed by November of the previous year – therefore, <i>at least 120 days</i> are available to the Hon'ble Commission for determination of RST Order. However, all the three IAs asking for extension for filing of ARR were made 3-4 months post the expiry of the statutory timeline for the same and hence ought not to have been allowed;</p>	<p>In view of the above, TS Discoms request the Hon'ble Commission to consider the True up Petitions filed by them.</p>
<p>6.6 While allowing the extension to the TS Discoms vide the relevant Interim Order for filing of the ARR and Tariff proposals for FY 2019-2022, the Hon'ble Commission vide Interim Orders dt. 06.11.2019, 20.03.2020 and 27.03.2021 had directed the DISCOMs to file the regular Petition for determination of fresh retail supply tariff, cross-subsidy and additional surcharged immediately for FY 2019-20, 2020-21 and 2021-22 respectively.</p>	<p>As regards to the Hon'ble APTEL's direction, TS Discoms submit that Regarding the delay in ARR proposals, TS Discoms would like to state that they have been filing the ARR petitions on annual basis before the Hon'ble Commission (TSERC) until FY 2018-19 without any delay. Further, for the period in which the Petitions could not be filed, TS Discoms have also not claimed any carrying cost.</p>
<p>6.7 However, it is evident that the same was not complied with by the Discoms till April of 2021 (by which time, the period for which it had been sought had already lapsed);</p>	
<p>6.8 Furthermore, nowhere in the Orders issued by the Hon'ble Commission, has it been indicated that the Discoms are at liberty to extend the ARR for FY 2018-19 for the entire period of 2019-2022 and then without any fresh ARR determination for the latter periods be allowed to recover the accumulated revenue gap in true-up and then unnecessarily burden the consumers</p>	

6.9 This amounts to a gross violation of Hon'ble ATE Direction directives in O.P. No. 1 of 2011:

*"57. This Tribunal has repeatedly held that regular and timely truing-up expenses must be done since: (b) The **burden/benefits of the past years must not be passed on to the consumers of the future.** ...*

*59. **Tariff determination** ought to be treated as **a time bound exercise.***

...

65. In view of the analysis and discussion made above, we deem it fit to issue the following directions to the State Commissions:

*(ii) It should be the endeavour of every State Commission to ensure that the tariff for the financial year is decided before 1st April of the tariff year. For example, the ARR & tariff for the financial year 2011- 12 should be decided before 1st April, 2011. **The State Commission could consider making the tariff applicable only till the end of the financial year so that the licensees remain vigilant to follow the time schedule for filing of the application for determination of ARR/tariff.***

*(iii) **In the event of delay in filing of the ARR, truing up and Annual Performance Review, one month beyond the scheduled date of submission of the petition, the State Commission must initiate suomoto proceedings for tariff determination in accordance with Section 64 of the Act read with clause 8.1 (7) of the Tariff Policy".***

(Emphasis supplied)

	<p>7. Additionally, the credit rating of the Power Utilities to get loans gets affected with Non-submission of the ARR and Tariff Proposals: In the Integrated Rating Score Methodology introduced by Ministry of Power for assessing the health of Discoms, one of the Parameter is Specific Disincentives which provides for Tariff Cycle Delays in terms of timely filing of the Petitions.</p>	
	<p>8. By allowing utilities to claim the entire cost variation in power purchase trueup without filling of the ARR for the relevant Financial Year but instead continued to levy existing Tariff will set a bad authority as it would be tantamount to the fact that utilities can continue to be in violation of the regulatory and legal process and still burden the consumers without taking any burnt for the same. This would essentially leave the entire exercise of annual filing of ARR and Tariff Proposals on projection basis before the beginning of the FY and subsequent true-up on basis of actuals futile.</p>	
	<p>9. For the aforementioned reasons it is humbly submitted before the Commission to disallow the Discoms their true up claims for the year 201920, 2020-21 and 2021-22 in the face of non-filling of ARR and Tariff Proposals for the relevant years and set an authority for utilities to operate within the stipulated timelines and not on its own whims to unnecessarily burden the consumers.</p>	
	<p>10. Notwithstanding the above, the other objections against the True-up claimed by the Petitions are detailed in the subsequent sections.</p>	
4	<p>POWER PURCHASE COST: A. TSGENCO Thermal Power Stations: i) Arbitrary Escalation considered in Variable Charges: It is observed that the both Petitioners, i.e., TSSPDCL and TSNPDCL have shown significant escalation in</p>	<p>TS Discoms submit that the power purchase cost paid by them is after verification of the bills raised by the generating companies. TS Discoms, as part of additional information are submitting the invoices raised by</p>

	variable charge rate as compared to Hon'ble Commission approved values for the period during FY 2016-17 to FY 2018-19 and FY 2022-23.						generating stations from which they have procured power from.
	ii) The variation is particularly observed in case of some TSGENCO thermal stations without providing any rationale with the instant Petitions. It is submitted that the variation from the approved values ought to be supported by proper rationale. The Objector in the absence of proper backing/rationale has limited the variable charge rate to the approved variable charge rate in the respective RST orders.						
	iii) The anomalies observed in this regard have been reproduced below:						
TSGENCO Generating stations	TSSPDCL			TSNPDCL			
	Variable Charge Rate (Rs/kWh)			Variable Charge Rate (Rs/kWh)			
	Approved	Claimed	Escalation %	Approved	Claimed	Escalation %	
FY 2016-17							
KTPS-D	2.02	2.22	10%	2.02	2.22	10%	
FY 2017-18							
KTPS-A	2.07	2.91	41%	2.08	2.92	40%	
KTPS-B	2.07	2.91	41%	2.08	2.92	40%	
KTPS-D	1.92	2.54	33%	1.93	2.54	32%	
KTPS Stage VI	2.45	2.75	12%	2.45	2.75	12%	
RTS B	2.36	2.91	23%	2.38	2.95	24%	
FY 2018-19							
KTPS-A	2.17	3.20	47%	2.18	3.19	46%	
KTPS-B	2.17	3.20	47%	2.18	3.19	46%	
KTPS-C	2.17	3.20	47%	2.18	3.19	46%	
KTPS-D	2.02	2.82	39%	2.03	2.82	39%	

	KTPS-VI	2.57	3.13	22%	2.57	3.13	22%																													
	RTS B	2.48	2.94	19%	2.46	2.94	20%																													
	Kakatiya Thermal Power Plant I	2.55	3.34	31%	2.56	3.35	31%																													
	Kakatiya Thermal Power Plant II	2.36	2.92	24%	2.36	2.93	24%																													
iv) It is humbly submitted that Hon'ble Commission may direct the TS Discoms to submit proper rationale/justification/backing for such significant escalation considered in variable charge rate.																																				
v) It is further requested that Hon'ble Commission may limit the variable charge rate to approved variable charge rate.																																				
Summary of disallowance in Variable Charges: <i>(All figures in Rs. Crores)</i>																																				
<table border="1"> <thead> <tr> <th colspan="4">Disallowance Proposed in Variable Cost as per Objector</th> </tr> <tr> <th>Financial Year</th> <th>TSSPDCL</th> <th>TSNPDCL</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>FY 17</td> <td>19.79</td> <td>-</td> <td>19.79</td> </tr> <tr> <td>FY 18</td> <td>325.82</td> <td>159.61</td> <td>485.43</td> </tr> <tr> <td>FY 19</td> <td>925.30</td> <td>385.41</td> <td>1,310.71</td> </tr> <tr> <td>FY 23</td> <td>449.09</td> <td>201.49</td> <td>650.58</td> </tr> <tr> <td>Total</td> <td>1,719.99</td> <td>746.52</td> <td>2,466.51</td> </tr> </tbody> </table>									Disallowance Proposed in Variable Cost as per Objector				Financial Year	TSSPDCL	TSNPDCL	Total	FY 17	19.79	-	19.79	FY 18	325.82	159.61	485.43	FY 19	925.30	385.41	1,310.71	FY 23	449.09	201.49	650.58	Total	1,719.99	746.52	2,466.51
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B. Central Generating Stations: i) It is pointed out that the Hon'ble Commission has clearly directed the TS Discoms to consider null capacity allocation from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd from 01.08.2017 onwards.																																				
It is unfair on part of the objector to request the Hon'ble Commission to limit the variable charges to the approved variable charge rate. TS Discoms request the Hon'ble Commission to approve the actual variable charge as claimed after prudence check of the claims made by the TS Discoms.																																				
The direction of the Hon'ble Commission for not considering the capacity allocation from NTECL Vallur TPS and NLC Tamil Nadu Power Limited was on account of the higher cost of power from such stations.																																				

<p>ii) In line with directive, the Hon'ble TSERC has not considered any capacity allocation from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd in its past RST order dt. 26.08.2017 for FY 2017-18, RST order dt. 27.03.2018 for FY 2018-19 and latest RST order dt. 23.03.2022 for FY 2022-23.</p>	<p>In this regard it is to be noted that the TS Discoms, on the first hand have themselves submitted a requisition to the Ministry of Power (MoP), Government of India (GoI) expressing their willingness to surrender the share of Telangana State from NTECL Vallur TPS and this has been recorded by the Hon'ble Commission in RST Order for FY 2017-18 (as also extracted by the objector).</p> <p>Further, acknowledging the initiative of the TS Discoms, the Hon'ble Commission in the RST Order for FY 2018-19 had directed to also pursue the willingness of TS Discoms to surrender share of NLC Tamil Nadu Power Limited.</p> <p>In this regard, it is to be noted that since the allocation of power to the States is done by MoP, it is not under the control of TS Discoms to surrender the share of Telangana. TS Discoms, as per the directive of the Hon'ble Commission have made request to surrender Telangana share in NTECL Vallur TPS and NLC Tamil Nadu Power Limited, however, it is still pending to be accepted.</p> <p>In view of the above, it shall be unfair on part of the objector to make such objections and request the Hon'ble Commission to also penalize the TS Discoms</p>
<p>iii) The relevant extracts from the past RST orders have been reproduced below for reference:</p> <ul style="list-style-type: none"> • <u>The Hon'ble Commission in its RST Order dt. 26.08.2017 for FY2017-18 has stated the following:</u> <i>"3.3.17 To reduce the financial burden upon them, the Licensees submitted a requisition to GoI expressing its willingness to surrender the share of Telangana State from NTECL Vallur TPS. In view of the requisition made by the Licensees, the Commission also observes that NLC Tamil Nadu Power Ltd. is also a similar project with high cost of generation. The Commission thus directs the DISCOMs to surrender the allocated share of Telangana State in NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. Hence the Commission in this Order, has not considered the energy availability from these generating stations from 01.08.2017 onwards."</i> • <u>The Hon'ble Commission in its RST Order dt. 27.03.2018 for FY2018-19 has stated the following:</u> <i>3.3.18 The Commission in its Tariff Order for FY 2017-18 dated 26.08.2017 directed the DISCOMs to surrender the allocated share of Telangana State in NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. and accordingly, had not considered the energy availability</i> 	

from these stations from 01.08.2017. The DISCOMs submitted that in response to their request for re-allocation of the share of Telangana State in NTECL Vallur TPS, there is no confirmation from the Ministry of Power, GoI to that effect. The DISCOMs also submitted that the re-allocation of the share in NLC Tamil Nadu Power Ltd. will be taken up after the re-allocation of share in NTECL Vallur TPS. The Commission observed that the DISCOMs are procuring power from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. in FY 2017-18 and have proposed in FY 2018-19 also. **In light of the directions in the Tariff Order for FY 2017-18, the Commission has not considered the share allocation to Telangana State from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. for FY 2018-19.**

- The Hon'ble Commission in its RST order dt. 23.03.2022 for FY 2022-23 has approved the following:

Table 4-15 Power procurement cost from Central Generating Stations for FY 2022-23

Source	Claimed				Approved			
	Quantum MU	Fixed Cost Rs.crore	Variable Cost Rs.crore	Total Rs.crore	Quantum MU	Fixed Cost Rs.crore	Variable Cost Rs.crore	Total Rs.crore
Thermal								
NTPC Ramagundam Stage I & II	2603.01	188.60	690.83	879.22	2716.15	181.22	699.16	880.38
NTPC Ramagundam Stage III	721.42	57.15	162.20	239.35	729.22	53.89	164.17	238.06
NTPC Talcher TPS II	1638.93	117.79	284.28	402.07	1598.29	110.39	277.23	387.62
NTPC Simhadri Stage I	2251.89	478.57	707.56	1186.13	3672.35	356.75	1153.88	1510.63
NTPC Simhadri Stage II	1298.23	230.24	368.51	628.75	1765.35	245.11	541.91	787.02
NTPC Kudgi	1017.12	319.88	348.05	667.92	1751.40	294.24	599.31	893.55
NLC TPS II Stage I	395.60	27.08	104.54	131.63	385.93	28.10	101.99	130.09
NLC TPS II Stage II	710.07	50.12	187.82	237.95	692.64	52.26	183.21	235.47
NNTPP	402.72	68.24	88.03	156.28	392.73	78.22	85.84	164.06
TSPP Unit 1	3499.63	790.92	794.42	1585.33	3412.84	711.82	774.72	1486.54
NTECL Vallur TPS	834.63	135.00	245.48	380.48	0.00	0.00	0.00	0.00
NLC Tamil Nadu Power Ltd.	1068.60	188.57	263.77	472.34	0.00	0.00	0.00	0.00
Sub Total	16521.83	2652.16	4315.29	6967.45	17116.91	2112.01	4601.41	6713.42
Nuclear								

iv) It is evident from the Hon'ble Commission past directives/methodology that the TS Discoms have not been allowed to procure power from these two specified Power Stations. Despite this, the TS Discoms have procured power from these stations in clear violation of the Hon'ble TSERC's directives. The TS Discoms claim in this regard as per instant filings is represented below for reference:

TSSPDCL Generating Stations	Approved		Claimed PP cost (In Crores)					Total
	Despatch (MUs)	PP Cost (In Crores)	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	
NTECL Vallur	-	-	93.70	105.43	117.61	246.00	242.00	804.74
NLC	-	-	-	-	-	269.00	-	269.00
Total	-	-	93.70	105.43	117.61		242.00	1,073.74

TSNPDCL	Approved	Claimed PP cost (In Crores)	

Generating Stations	Despatch (MUs)	PP Cost (In Crores)	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	Total
NTECL Vallur	-	-	39.00	41.00	49.00	103.00	101.00	333.00
NLC	-	-	-	-	132.00	113.00	-	245.00
Total	-	-	39.00	41.00	181.00	216.00	101.00	101.00

v) The Objector, in line with the Hon'ble Commission's past methodology/directives, has not considered any capacity allocation from these two generating stations for power purchase computation and disallowed the amount claimed against power purchase cost in regard of these two CGS stations.

(All figures in Rs. Crores)

Disallowance in CGS PP cost as per Objector Assessment			
	Claimed	Objector	Disallowance
TSSPDCL	1,073.74	-	1,073.74
TSNPDCCL	578.00	-	578.00
Total	1,651.74	-	1,651.74

vi) .It is humbly requested that the Hon'ble Commission may penalise the Discoms for not adhering to the directives specified and may allow the power purchase cost from CGS stations as per Objector's Assessment.

C. Sale of Surplus Power

i) It is humbly submitted that the sale of surplus power ought to be made at an optimal price as per market conditions in order to earn revenue and/or reduce the Power Purchase.

ii) It is observed that the TS Discoms have sold the surplus power for some financial year at a price lower than the IEX average MCP for that particular year.

iii) Some instance has been recorded below for reference:

It is to be noted that the TS Discoms have engaged in sale of surplus power considering the real time situation of the market and only if the market conditions are favorable i.e., only in some time blocks when the cost per unit of power available in the market is higher than the actual cost per unit to be incurred by TS Discoms.

	<ul style="list-style-type: none"> • TSSPDCL for FY 2018-19 has recorded 1229.35 MUs as surplus power which is sold at a rate of Rs. 3.10/kWh but IEX MCP for FY 2018-19 is on quite higher side i.e. Rs. 3.86/kWh. • TSNPDCL for FY 2016-17 & FY 2018-19 has recorded 44 MUs and 1150 MUs as surplus power which are sold at a rate of Rs. 2.05/kWh and Rs. 3.18/kWh respectively which is again at a lower side as compared to IEX MCP of Rs. 2.41/kWh and Rs. 3.86/kWh respectively. • TSNPDCL for FY 2016-17 has purchased 544 MUs from market at a rate of Rs. 4.69/kWh which is on a higher side to IEX MCP of Rs. 2.41/kWh. 	<p>In view of the above, it is not correct on the part of objector to consider the average MCP of particular year to arrive at the revenue from sale of surplus power.</p>						
	<p>iv) The Objector has estimated actual revenue ought to be generated from the sale of surplus power in accordance to IEX MCP and reduced the same from power purchase cost. It is prayed that the Hon'ble Commission may allow the sale of surplus power as per the Objector's computations.</p>							
	<p>D. Discom to Discom Sales i) As a general regulatory procedure, Discom to Discom power sales ought to be made in accordance to average power purchase price of the respective Discoms.</p>	<p>It is to be noted that the power from generating stations is dispatched based on central dispatch for the entire state and on real time the energy share of one Discom happens to be utilized by another Discom. The cost component of such D-D transactions equals each other i.e., one being positive and another negative with no cost impact for the State as a whole. ii) Furthermore, it is apparent that the Discoms have deviated from this approach</p>						
	<p>ii) Furthermore, it is apparent that the Discoms have deviated from this approach in their instant True Up petition as can be observed from the Petitioner's claims in respect of D-D transactions:</p> <p style="text-align: center;">Summary of D-D sales as per Petitioners:</p> <table border="1" data-bbox="205 1252 1234 1359"> <thead> <tr> <th data-bbox="205 1252 590 1308"></th> <th data-bbox="590 1252 1234 1308">As perPetitioner</th> </tr> <tr> <th data-bbox="205 1308 590 1359">Particulars</th> <th data-bbox="590 1308 1234 1359">F / 2022-23</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>		As perPetitioner	Particulars	F / 2022-23			<p>in their instant True Up petition as can be observed from the Petitioner's claims. It is to be observed that the Objector has considered a different per unit cost for such D-D settlements than that</p>
	As perPetitioner							
Particulars	F / 2022-23							

	Energy	Cost	Unit Price
	MUs	Rs. Crores	Rs/kWh
Sale to TSSPDCL	1,183.00	451.00	3.81
Average Power Purchase Cost for TSNPDCL	20,660.00	11,637.00	5.63

Particulars	FY 2019-20			FY 2020-21			FY 2021-22		
	Energy	Cost	Unit Price	Energy	Cost	Unit Price	Energy	Cost	Unit Price
	Mus	Rs. Crores	Rs/kWh	Mus	Rs. Crores	Rs/kWh	Mus	Rs. Crores	Rs/kWh
Sale to TSNPDCL	2,345.21	900.07	3.84	2,174.46	846.42	3.89	958.00	400.00	4.18
Average Power Purchase Cost for TSSPDCL	39,797.25	21,501.33	5.40	38,200.03	21,510.51	5.63	45,480.00	25,033.00	5.50

claimed by the TS Discoms. In this regard, it is to be noted that irrespective of the per unit cost considered, the overall cost impact on the State should be zero. Considering the same, the Objector's contention of additional revenue generation does not hold good as the additional revenue generation of one Discom is compensated by the additional cost incurred by other Discom.

iii) The Objector has re-worked the allowable actual Average Power Purchase Cost for TSSPDCL and TSNPDCL (which has been taken as the price at which power is to be sold from TSSPDCL to TSNPDCL) considering the previous sections of the instant Objections. The same has been shown below:

Summary of D-D transactions as per Objector's Assessment

Particulars	FY 2019-20			FY 2020-21			FY 2021-22		
	Energy	Cost	Unit Price	Energy	Cost	Unit Price	Energy	Cost	Unit Price
	Mus	Rs. Crores	Rs/kWh	Mus	Rs. Crores	Rs/kWh	Mus	Rs. Crores	Rs/kWh

Sale to TSNPDCL	2,345.2 1	1,267.0 5	5.40	2,174.4 6	1,224.4 4	5.63	958.0 0	527.3 0	5.50
Average Power Purchase Cost for TSSPDCL	39,797. 25	21,501. 33	5.40	38,200. 03	21,510. 51	5.63	45,480. 00	25,033. 00	5.50

Particulars	As per Objector		
	FY 2022-23		
	Energy	Cost	Unit Price
	Mus	Rs. Crores	Rs/kWh
Sale to TSSPDCL	1,183.00	666.34	5.63
Average Power Purchase Cost for TSNPDCL	20,660.00	11,637.00	5.63

iv) The Objector has computed the amount of Rs. 3685.13 pertaining to revenue generated form D-D Sales @ MCP which is 1087.64 Crores more than the Petitioner's Claim. The same is tabulated below for reference

(All figures in Rs. Crores)

Revenue Generated by D-D sales

FY	Petitioner (A)	Objector (B)	Excess Revenue Generated (B-A)
FY 2019-20	900.07	1,267.05	366.98
FY 2020-21	846.42	1,224.44	378.02
FY 2021-22	400.00	527.30	127.30
FY 2022-23	451.00	666.34	215.34
Total	2,597.49	3,685.13	1,087.64

No Comments

	<p>E. Interest on Pension Bonds:</p> <p>i) It is a set principle that pension funds must be maintained from the contributions of the management & employees and should be used appropriately to earn interest thereon.</p>	<p>The erstwhile APERC in the Order dated 24.03.2003 in O.P.No. 402 of 2002 allowed the liability of additional interest on pension bonds as a pass through in the tariff on a year to year basis up to the FY 2032-33. The aforementioned Order of the APERC shows that any additional liability due to increase in the amount of pension is recognised as a pass through in the tariff of APGENCO. After the formation of the Telangana State, the pension liability was passed on to TSGENCO.</p>
	<p>ii) It is observed that the both petitioners have claimed the interest on pension bonds for some financial years even greater than the approved amount by Hon'ble Commission in its past RST orders.</p>	<p>The additional interest on pension bonds claimed by the TS Discoms are the amounts as claimed by TS GENCO in line with the aforementioned Order dated 24.03.2003 in O.P.No. 402 of 2002. In this regard, it is to be noted that the amount approved by the</p>
	<p>iii) The escalated amount is claimed without any data backing and documents, even the Objector is unable to verify the same amount from the audited accounts available in public domain.</p>	<p>Hon'ble Commission in the RST Order is provisional in nature and at the end of year, TS Genco raises supplementary bills to TS Discoms with the actual pension liabilities paid by it.</p> <p>For FY 2016-17, the variation of actual amount from the approved amount is on account of adjustment of pension liabilities outstanding for past three years. For the period from FY 2019-20 to FY 2021-22, it is to be noted that TS Discoms could not file the ARR and Tariff Petitions and considering the same, the approved amount was considered as equal to the approved value in RST Order for FY 2018-19.</p> <p>Further, the variation of actual amount from the approved amounts is on account of past liabilities and the supplementary bills raised by TS Genco at the end of the respective year.</p>

<p>iv) The Hon'ble Commission in its TSGENCO MYT Order dt. 22.03.2022 has also issued following directive in this regard:</p> <p><i>"New Directives</i> <i>10. Liabilities on pension bonds</i> <i><u>The Commission directs TS Genco to extract the request of the stakeholder that the Government of Telangana shall bear the additional burden of pension bonds and communicate to the Principal Secretary, Energy, GoTS for favourable consideration.</u></i>"</p>	<p>TS Discoms submit that till the time GoTS accepts to bear the additional burden of pension bonds, TS Discoms are required to pay for the claims made by the TS Genco as per the aforementioned Order dated 24.03.2003 in O.P.No. 402 of 2002.</p>																																																							
<p>v) As the instant matter is backdated and lacking substantial justification, the Objector for the computation of Power Purchase Cost has limited the interest amount to its approved value.</p> <table border="1" data-bbox="247 781 1228 1305"> <thead> <tr> <th colspan="5">Summary of Disallowance in Interest on Pension Bonds</th> </tr> <tr> <th></th> <th>Approved</th> <th>Claimed</th> <th>Objector</th> <th>Disallowance</th> </tr> </thead> <tbody> <tr> <td colspan="5">TSSPDCL</td> </tr> <tr> <td>FY 2016-17</td> <td>227.17</td> <td>1,311.08</td> <td>227.17</td> <td>1,083.91</td> </tr> <tr> <td>FY 2019-20</td> <td>273.08</td> <td>821.73</td> <td>273.08</td> <td>548.65</td> </tr> <tr> <td>FY 2020-21</td> <td>482.77</td> <td>827.28</td> <td>482.77</td> <td>344.51</td> </tr> <tr> <td>FY 2021-22</td> <td>482.77</td> <td>762.00</td> <td>482.77</td> <td>279.23</td> </tr> <tr> <td>Total TSSPDCL (A)</td> <td>1,465.79</td> <td>3,722.09</td> <td>1,465.79</td> <td>2,256.30</td> </tr> <tr> <td colspan="5">TSNPDCL</td> </tr> <tr> <td>FY 2016-17 (B)</td> <td>95</td> <td>547</td> <td>95</td> <td>452.00</td> </tr> <tr> <td>Total (A+B)</td> <td>1,560.79</td> <td>4,269.09</td> <td>1,560.79</td> <td>2,708.30</td> </tr> </tbody> </table>	Summary of Disallowance in Interest on Pension Bonds						Approved	Claimed	Objector	Disallowance	TSSPDCL					FY 2016-17	227.17	1,311.08	227.17	1,083.91	FY 2019-20	273.08	821.73	273.08	548.65	FY 2020-21	482.77	827.28	482.77	344.51	FY 2021-22	482.77	762.00	482.77	279.23	Total TSSPDCL (A)	1,465.79	3,722.09	1,465.79	2,256.30	TSNPDCL					FY 2016-17 (B)	95	547	95	452.00	Total (A+B)	1,560.79	4,269.09	1,560.79	2,708.30	<p>In view of the above submissions, TS Discoms request the Hon'ble Commission to approve the additional interest on pension bonds as claimed.</p>
Summary of Disallowance in Interest on Pension Bonds																																																								
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<p>F. Miscellaneous Charges (Transmission Cost, SLDC Cost & PGCIL & ULDC OR POSOCO Charges)</p> <p>i) The TSSPDCL and TSNPDCL have claimed a cumulative amount of Rs. 13,888.89 Crores and Rs. 5,874 Crores respectively towards Transmission Cost, SLDC Cost & PGCIL & ULDC OR POSOCO Charges).</p>	<p>TS Discoms submit that the Transmission Cost, SLDC cost and PGCIL & ULDC or POSOCO Charges are approved along with the power purchase cost in the respective tariff orders.</p>																																													
<p>ii) It is submitted that Hon'ble Commission in its past RST for FY 2016-17, 2017-18, FY 2018-19 & FY 2022-23 orders have not included any of these charges in while approving power purchase cost. But the Petitioners have also shown amount pertaining to these charges under approved values for calculating Power Purchase deviation.</p>	<p>It is an established fact that the cost of power purchase from the perspective of a distribution licensee includes all the cost incurred in such procurement and it includes the cost incurred for transmission of power till its distribution network.</p>																																													
<p>iii) In line with the same methodology as followed by the Hon'ble Commission in its past RST for FY 2016-17, 2017-18, FY 2018-19 & FY 2022-23 orders, the objector has computed the power purchase cost without considering any true-up in these charges. The summary of charges considered by the Petitioner in Power Purchase True up claim is summarized below:</p> <p>Charges Claimed by Petitioners for FY 2016-17 to FY 2022-23:</p> <p style="text-align: right;">(All</p> <p style="text-align: center;">Figures in Crores)</p> <table border="1" data-bbox="210 1068 1234 1352"> <thead> <tr> <th>Both Discoms</th> <th>FY 17</th> <th>FY 18</th> <th>FY 19</th> <th>FY 20</th> <th>FY 21</th> <th>FY 22</th> <th>FY 23</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Transmission Cost</td> <td>1,790.12</td> <td>1,024.00</td> <td>1,409.00</td> <td>1,410.53</td> <td>2,317.07</td> <td>2,857.00</td> <td>-</td> <td>10,807.72</td> </tr> <tr> <td>SLDC Cost</td> <td>28.86</td> <td>33.00</td> <td>35.00</td> <td>34.84</td> <td>49.60</td> <td>51.00</td> <td>-</td> <td>232.30</td> </tr> <tr> <td>PGCIL Charges</td> <td>735.77</td> <td>1,096.00</td> <td>1,577.00</td> <td>2,232.00</td> <td>1,511.30</td> <td>1,569.00</td> <td>-</td> <td>8,721.07</td> </tr> <tr> <td>ULDC or POSOCO Charges</td> <td>1.60</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>1.60</td> </tr> </tbody> </table>	Both Discoms	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22	FY 23	Total	Transmission Cost	1,790.12	1,024.00	1,409.00	1,410.53	2,317.07	2,857.00	-	10,807.72	SLDC Cost	28.86	33.00	35.00	34.84	49.60	51.00	-	232.30	PGCIL Charges	735.77	1,096.00	1,577.00	2,232.00	1,511.30	1,569.00	-	8,721.07	ULDC or POSOCO Charges	1.60	-	-	-	-	-	-	1.60	<p>It is to be noted that as per Clause 11 of Regulation No. 4 of 2005, the ARR items under Retail Supply Business include both cost of power procurement and Transmission charges and the Regulation No. 1 of 2014 i.e, first amendment to Regulation No. 4 of 2005 provides for true up for Retail Supply Business implying the true up of both cost of power procurement and transmission charges and considering the same TS Discoms have filed the instant true up filings including the Transmission Cost, SLDC cost and PGCIL & ULDC or POSOCO Charges</p> <p>In view of the above, the objection that the cost incurred for transmission shall not be included in true up is not valid and lacks proper justification</p>
Both Discoms	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22	FY 23	Total																																						
Transmission Cost	1,790.12	1,024.00	1,409.00	1,410.53	2,317.07	2,857.00	-	10,807.72																																						
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Total	2,556.35	2,153.00	3,021.00	3,677.37	3,877.97	4,477.00	-	19,762.69
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**Charges shown by Petitioners in approved PP cost for FY 2016-17 to FY 2022-23:
(All**

Figures in Crores)

Both Discoms	FY 17	FY 18	FY 19	FY 20	FY 21	FY 22	FY 23	Total
Transmission Cost	1,702.09	1,024.00	1,408.57	1,410.53	2,317.07	2,857.00	-	10,719.26
SLDC Cost	28.86	33.00	34.50	34.84	49.60	51.00	-	231.80
PGCIL Charges	521.90	1,174.00	922.98	922.98	922.98	922.98	-	5,387.82
ULDC or POSOCO Charges	6.14	-	-	-	-	-	-	6.14
Total	2,258.99	2,231.00	2,366.05	2,368.35	3,289.64	3,830.98	-	16,345.01

5 **SUMMARY OF OBJECTOR'S ASSESSMENT OF ALLOWABLE TRUE UP CLAIM FOR FY 2016-17 TO FY 2022-23:**
i) On accumulating the above discussed parameters, the true up amount as per Objector's assessment vs Petitioner's submission are provided below:

TS Discoms appreciate the intention and efforts put in by the objector, behind the analysis undertaken on the true up claims for the period from FY 2016-17 to FY 2022-23. However, TS Discoms feel that the approach followed is intended only towards the reduction of the claims made by the TS Discoms.

Summary of True Up claim for TSSPDCL and TSNPDCL for FY 2016-17 to FY 2022-23

(All figures in Rs. Crores)

PP Cost True up claimed by TS Discoms			As per Objector Assessment			
FY	TSSPDCL	TSNPDC	Total	TSSPDCL	TSNPDC	Total
FY 2016-17	-230.59	-38.78	-269.37	-1,545.66	-703.58	-2,249.24
FY 2017-18	-365.23	126.73	-238.50	-628.99	-16.14	-645.14
FY 2018-19	877.23	-266.31	610.92	-646.87	-960.00	-1,606.87
FY 2019-20	30.20	593.87	624.07	-1,965.87	218.85	-1,747.02
FY 2020-21	1,106.80	490.25	1,597.05	-148.67	136.82	-11.85
FY 2021-22	6,372.00	2,417.81	8,789.81	4,994.45	2,012.00	7,006.45
FY 202223*	1,270.39	-369.10	901.29	580.31	-886.93	-306.62
Total True up/(True Down)	9,060.80	2,954.47	12,015.27	638.70	-198.99	439.71

*Note: Detailed computation of Power Purchase True Up/ (True Down) as per Objector's Assessment is attached herewith as **Annexure A**.

TS Discoms have responded to the item-wise objections/suggestions 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

ii) The detailed summary of Objector's Assessment Vs Petitioner's Claim of True up claim for FY 2016-17 to FY 2022-23 is provided below:

(All figures in Rs. Crores)

TSSPDCL	FY 2016-17		FY 2017-18		FY 2018-19		FY 2019-20	
	Petitioner	Objector	Petitioner	Objector	Petitioner	Objector	Petitioner	Objector
PP True up/ (True Down)	1,588.32	273.18	936.04	672.28	3,799.05	2,274.95	3,900.32	1,904.25
<u>Additional Support by GoTS</u>	1,583.83	1,583.83	908.79	908.79	1,680.00	1,680.00	1,400.00	1,400.00
Loss Funding	235.01	235.01	392.48	392.48	1,241.82	1,241.82	2,470.12	2,470.12
Net True Up/(True Down)	-230.52	-1,545.6	-365.23	-628.99	877.23	-646.87	30.20	-1,965.87

(All figures in Rs. Crores)

FY 2020-21		FY 2021-22		FY 2022-23		Total TSSPDCL	
Petitioner	Objector	Petitioner	Objector	Petitioner	Objector	Petitioner	Objector
3,230.80	1,975.33	6,372.00	4,994.45	1,270.39	580.31	21,096.92	12,674.75
-	-	-	-	-	-	5,572.62	5,572.62
2,124.00	2,124.00	-	-	-	-	6,463.43	6,463.43

(All figures in Rs. Crores)

TSNPDCCL	FY 2016-17		FY 2017-18		FY 2018-19		FY 2019-20	
	Petitioner	Objector	Petitioner	Objector	Petitioner	Objector	Petitioner	Objector
PP True up/ (True Down)	715.91	50.63	672.26	529.39	1,216.55	522.86	1,752.02	1,377.00
Additional Support by GoIS	678.79	678.79	389.48	389.48	720.00	720.00	600.00	600.00
Loss Funding	75.42	75.42	156.05	156.05	762.86	762.86	558.15	558.15
Net True Up/(True Down)	-38.30	-703.58	126.73	-16.14	-266.31	-960.00	593.87	218.85

(All figures in Rs. Crores)

FY 2020-21		FY 2021-22		FY 2022-23		Total TSNPDCL	
Petitioner	Objector	Petitioner	Objector	Petitioner	Objector	Petitioner	Objector
1,710.43	1,357.00	2,417.81	2,012.00	-369.10	-886.93	8,115.88	4,961.94
-	-	-	-	-	-	2,388.27	2,388.27
1,220.18	1,220.18	-	-	-	-	2,772.66	2,772.66
490.25	136.82	2,417.81	2,012.00	-369.10	-886.93	2,954.95	-198.99

6 **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;

TS Discoms have responded to the item-wise objections/suggestions proposed by the objector, in the abovementioned sections, and would request the Hon'ble Commission to consider the projections shared by Discoms, considering the justifications shared on the same.

	<p>B. Disallow the Discoms their true up claims for the year 2019-20, 2020-21 and 2021-22 in the face of non-filing of ARR and Tariff Proposals for the relevant years and set an authority for utilities to operate within the stipulated timelines and not on its own whims to unnecessarily burden the consumers.</p> <p>C. Notwithstanding Prayer B, allow the following Prayers:</p> <p>D. Direct the Discoms to submit supporting documents against claiming escalation in Variable charge;</p> <p>E. Direct the Discoms to strictly adhere to Market MCP in order to determine the rate for transaction of power in the power exchange market;</p> <p>F. Direct Discoms to strictly adhere to Hon'ble Commission past directives;</p> <p>G. Disallow the power purchase cost as per the Objector's Assessment and in cases where the purchase has been projected at exorbitantly high price not relatable to the incumbent market situations;</p> <p>H. Pass necessary orders as may be deemed appropriate in the facts and circumstances of the case in the interest of justice;</p> <p>I. 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.</p>	
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Replies to the Objections/Suggestions raised on ARR &FPT including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 and Power Purchase true-up from FY 2016-17 to FY 2022-23 (Prov) for Retail Supply Business by Sri Lakshmi Kumar, ITC Limited - Paperboards & Specialty Papers Division, ITC Bhadrachalam House, 106, Sardar Patel Road, Secunderabad-500003.

S.No	Summary of Objections / Suggestions	Response of the Licensee
1	The Objector herein is engaged in the manufacture of paper and paperboard at Sarapaka Village, Bhadradri Kothagudem District, Telangana. The Objector also has a Captive Generating Plant at Sarapaka Village.	
2	The generation of electricity at the plant is by co-generation process whereby heat energy used for pulp cooking, humidification and drying is produced along with electricity utilised only for start power within the CMD with TSNPDCL or for import of open access power.	No Comments
3	<p>Objections to Proposal for Grid Support Charges for FY 2023-24 is submitted herewith on various grounds hereunder which are raised without prejudice to each other:</p> <p><u>Based on the objections on GSC for FY 2022-23.</u> the Hon'ble Commission 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 RETAIL SUPPLY TARIFFS & CROSS SUBSIDY SURCHARGE Order FOR FY 2022-23, dated 23.032022 is as follows:</p> <p><i>"6.25.6 In accordance with Clause 5.1 of the Regulation No. 4 of 2018, a Grid Coordination Committee has been constituted with</i></p>	<p>Hon'ble TSERC has entrusted the responsibility of discussing and proposing the Grid Support Charges/ Parallel Operation Charges to the TS Grid Co-ordination Committee (GCC).</p> <p>The GCC has conducted meetings with all the stakeholders on different occasions to gather their views on the levy of GSC/POC. The detailed objections/ suggestions from the stakeholders received during these meetings were already addressed orally and in written by TS Discoms.</p>

	<p><i>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. "</i></p> <p>Even as per the proposed ARR for 2023-24, the Grid Coordination Committee has initiated the detailed study on the matter of parallel operation of CPPs and consequent levy of GSC. And the proposal for levy of GSC for FY 2022-23 has not attained finality as on date. The Objector submits that the levy of GSC being pending with the Grid Coordination Committee, the proposal to levy the GSC for the year 2023-24 and the basis for computation of the levy is pre-mature and liable to be rejected.</p>	
3	<p>DISCOMs have proposed that grid support charges be levied on captive generating plants, co-generation plants, third party generation plants, merchant power generation units, rooftop power plants etc. that do not have PPA or have PPA for partial capacity with the licensees. The proposal is unreasonable both with respect to the levy itself and also with respect to the quantum. The Objector submits that grid support charges cannot be levied in light of the revised regime under the Electricity Act,</p>	<p>All the generators who are connected to the grid also enjoy the same benefits as the Captive Power Plants. In this regard, the Discom has proposed Grid Support Charges for all the Generators except those who have PPAs with the Discoms.</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 the following reasons.</p> <ul style="list-style-type: none"> • The fluctuations in the load are absorbed by the utility grid in the parallel operation mode. This will reduce the stresses on the captive generator and equipment.

<p>2003</p> <p>The policies of both State and Central Government and the Regulations of TSERC and CERC encourage the investments in renewable energy plants including waste heat recovery plants, the plants based on municipal solid waste and the co-generation plants by offering incentives. So, such GSC proposal will discourage the investments in this sector as well as defeat the purpose of the policies and the Regulations.</p> <p>GSC should not be levied at all on rooftop solar plants to encourage the investments as per the State government policy and the Regulation of TSERC. This investment helps in self sustainability of the industry as well as reduces the dependency on the grid. Therefore, such GSC proposal will discourage the investments in rooftop solar plants and it will defeat the policies of both Central and State Government issued for such investments and the Regulations by respective ERCs specific to solar renewable energy.</p>	<ul style="list-style-type: none"> ● 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. ● 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. <p>The impact created by sudden load throw off and consequent tripping of CPP generators on over speeding is avoided with the grid taking</p>
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		<p>care of the impact. Thus, the grid acts as the supporting system for the CPPs for its successful operation in terms of electrical performances. However, the grid support being an ancillary service extended by the licensee to the consumers, it has to be charged to the consumers who utilize the grid support.</p> <p>The full Bench of Tribunal in Appeal No. 120 of 2009 relating to Parallel Operation Charges (Grid Support Charges) in Chhattisgarh by Order dated 18.02.2011 stated that <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. Hence, the levy of grid support charges is well within the provisions.</p> <p>The grid support charges are not for drawl of power from the Distribution Licensee, but for utilization of parallel operation benefits by captive generators.</p> <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</p>
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		<p>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 2023-24 are well within the provisions of Act.</p> <p>The above benefits are elaborated by TS Discoms during the GCC meetings with the stakeholders.</p>
4	<p>There is nothing in the Grid Code which enables and/or authorises the levy of grid support charges.</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 & above level HT consumers are not paying Transmission charges & SLDC charges to respective entities even though connected to 132kV & above level. These consumers are paying retail supply Tariffs as approved by the Hon'ble State Commission from time to time which is inclusive of all costs (Incl SLDC & Transmission Charges).</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 2023-24 are well within the provisions of Act. However, the full Bench of Tribunal in Appeal No. 120 of 2009 relating to Parallel Operation Charges (Grid Support Charges) in Chhathisgarh 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</i></p>

		<p>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> <p>The licensee has not denied CPPs access to grid or availing of parallel operation benefits.</p> <p>It is clarified that the captive generators who intended to use and benefit from parallel operation need to pay the Grid Support charges, in line with the justifications mentioned in the previous sections.</p>
5	<p>The issues involved in the levy and/or quantification of grid support charges are complex and require to be heard, considered and decided in a separate proceedings. The licensees must first provide real data and facts on the incidence of grid support being <u>actually availed</u> by different types of industries, and they must also provide a details of how the proposed quantification of the charges is justified with reasons.</p>	<p>The detailed study/ analysis for levy of Grid Support Charges has already been submitted by TS Discoms during the GCC meetings held during various occasions during FY 2022-23.</p> <p>Hon'ble TSERC has entrusted the responsibility of discussing and proposing the Grid Support Charges/ Parallel Operation Charges to the TS Grid Co-ordination Committee (GCC).</p>
6	<p>Other than merely reproducing the provision in the previous APERC order dated 08/02/2002 and the Supreme Court order dated 29/11/2019, there is no reasoning given in the proposal with regard to the justification for levying grid support charges and/or the quantum of such charges with due regard to the sea change subsequently with the coming into force of the Electricity Act 2003.</p> <p>The Hon'ble Commission may consider the matter afresh having regard to the completely changed environment and regime after</p>	<p>The GCC has conducted meetings with all the stakeholders on different occasions to gather their views on the levy of GSC/POC. The detailed objections/ suggestions from the stakeholders received during these meetings were already addressed orally and in written by TS Discoms.</p> <p>The proposed grid support charges of 50% of 475 per KVA per month during the FY 2022-23 RST filings, was supposed to be levied on</p>

	<p>the Electricity Act 2003 has come into force.</p> <p>The proposed levy is of a nature that unreasonably mulct CPPs so as to discourage them. Such purpose or effect is contrary to the legislative policy and scheme of the Act which encourages captive generating plants and frees them from all manners of regulation. The proposal to levy grid support charges on captive generating plants deserves to be rejected on this ground alone.</p>	<p>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).</p> <p>Considering the interest of all stakeholders involved, the licensee has revised its GSC proposal as :</p> <ul style="list-style-type: none"> ❖ The parallel operation/grid support charges are to be applied to the total installed capacity of the generators connected to the Grid ❖ Conventional generators shall pay Rs.50 per kW per month ❖ 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. ❖ Rooftop solar plants under net metering/gross metering policy shall pay Rs.15 per kW per month. ❖ 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.
7	<p>The APERC order for 2002-2003 was made before the Electricity Act 2003 came into force. After the Electricity Act came into force, consumers have the right to source energy from any generator located anywhere under open access irrespective of whether a consumer has any contracted demand with the licensee or not. Every generator supplying energy operates in parallel with the grid. When no grid support charges are, or can be, levied based on the installed generating capacity of the source, whether it be an IPP or remote CPP under open access, there is no reason for levy of such a charge generation plants. The power and energy are</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 &Ispat Ltd</i>) and SERC orders.</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>Research paper on “<i>Grid Support charges on Captive power plant</i>”, by</p>

	<p>measured and accounted for only with respect to the 15 minute time blocks.</p>	<p><i>K. Balaraman, Ananthapadmanabha, R. Nagraja, K. Parthasarthy; presented at IIT Madras – National Power System Conference 2004</i> 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.</p> <p>Considering the interest of all stakeholders involved, the licensee has revised its GSC proposal as mentioned in above section.</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>
8	<p>It may be that certain kinds of industries may instantaneously draw large currents intermittently (e.g. in arc / induction furnaces) or produce harmonics which may or may not be in excess of the limits specified by the GTCS and/or the Grid Code. The incidence of such large intermittent / instantaneous loads and/or injection of harmonics in such industries may occur irrespective of their having a contracted demand with the licensee for the whole of their demand or for a part of their demand in conjunction with a CPP. These industries may have to be considered as a separate class. It is unreasonable that the incidents in such separate class taints all industries with CPPs even when no such instantaneous or intermittent loads or injection of harmonics are involved.</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 advantages of parallel operation are detailed in the above responses.</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: "No power plant shall qualify as a „captive generating plant“ under section 9 read with clause (8) of section 2 of the Act unless-</p>
9	<p>Industries may have CPPs with a capacity in excess of the captive requirement, and operation in parallel with the grid may be necessitated by the need to export their surplus power under open access or otherwise. There can be no justification for levy of grid</p>	<p>(a) in case of a power plant –</p> <ol style="list-style-type: none"> i. not less than twenty-six percent of the ownership is held by the captive user(s), and ii. not less than fifty-one percent of the aggregate

	<p>support charges in such cases since all the applicable charges towards transmission and wheeling are already being paid for export of surplus power.</p> <p>An industry with a CPP may connect to the grid for the purpose of importing additional power from another source under open access. There can be no justification for levy of grid support charges in such cases also.</p> <p>An industry with a CPP may also connect to the grid to avail start-up power for which a contracted demand is arranged and paid for by the consumer. There can be no justification for any grid support charges.</p>	<p>electricity generated in such plant, determined on an annual basis, is consumed for the captive use</p> <p>(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.”</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 Hon'ble 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>
10	<p>In co-generation plants (such as in processing industries or sugar industries), power may be required from the licensees only for start up. Their captive consumption is only a part of their captive generation. The surplus power has to be exported. They do not require or avail of any grid support whatsoever after start up. Any levy of grid support charges in such cases based on the generation or installed capacity shall be unwarranted and unreasonable. Properly, such CPPs must be considered as not availing or intending to avail any grid support for their loads unless it is established as a fact in a particular case that grid support for the loads is availed.</p>	
11	<p>If at all, it is the load (and more particularly, certain kinds of load) that may be alleged to impose instantaneous / intermittent demands on the grid. If some loads in some type of industries are considered to cause instantaneous demand on the grid, then it is only such loads</p>	

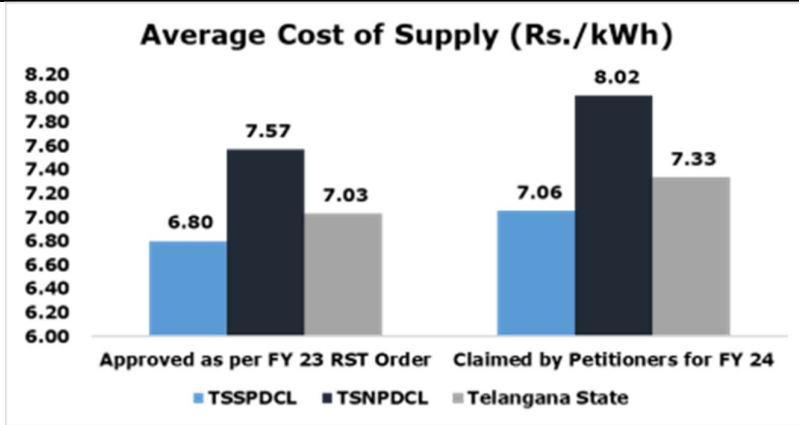
	<p>that could be relevant if at all any grid support charge is to be levied.</p> <p>The installed generation capacity is irrelevant and the levy on a charge on the basis of generation capacity is irrational and arbitrary. It must be noticed that the momentary loads or starting currents depend on the nature of the loads. The CPP, being the generating plant, is not the cause or source of such momentary loads or starting current, and it is wholly unreasonable to consider the generation capacity as relevant at all. The focus must therefore be on the load and not on the generating capacity</p>	
12	<p>Without prejudice to the above, the quantum proposed is entirely arbitrary, exorbitant and irrational. There is no justification or rationale for the quantum proposed. The licensee can be allowed a charge only if the licensee demonstrates actual costs related to such charge. There are no extra costs incurred by the licensee for the alleged or presumed effects of operation of CPPs in parallel with the grid. There has to be some cogent methodology for arriving at the quantum of the charge. It cannot be arbitrary and without any data or rational basis. Capacity of the surplus being sold under open access cannot be subjected to any such charges.</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 justification for levy of Grid Support Charges is detailed during the GCC meetings with stakeholders and is also detailed in above sections.</p>
13	<p>In continuous process industries, CPP would runs in parallel in order to avail continuous power supply, in the event of failure of CCP generating units. In such cases, the industry must necessarily have a contracted demand with the licensee to the extent of at least the expected recorded demand that would occur when the failure of the</p>	<p>Hence, TS Discoms request the Hon'ble Commission to approve the proposal for levy of Grid Support Charges.</p>

	generating plant occurs. It cannot be said or presumed that there is any grid support availed even when the generating plant is operating. Therefore, it is the load and its nature that is relevant, not the generation capacity.	
14	RPPO is imposed on consumption from captive generation. In order to comply with the RPPO, the industry needs to import renewable power. It is irrational to mulct such units when their connection to the grid is to avail open access for complying with a statutory obligation.	In addition to complying with a statutory obligation there are other benefits due to the parallel operation with the grid which are elaborated in response to section 3 above. It is clarified that the captive generators who intended to use and benefit from parallel operation need to pay the Grid Support charges, in line with the justifications mentioned in the previous sections.
15	It is submitted that the Honble Commission may await detailed scientific study by Grid Coordination Committee to assess the issue having regard to the diverse nature of the industries with CPPs, and to determine the particular criteria by which grid support may be considered to have been availed, and to lay out a methodology by which the quantum of charge, where considered leviable, is to be determined.	Hon'ble TSERC has entrusted the responsibility of discussing and proposing the Grid Support Charges/ Parallel Operation Charges to the TS Grid Co-ordination Committee (GCC). The GCC has conducted meetings with all the stakeholders on different occasions to gather their views on the levy of GSC/POC. The detailed objections/ suggestions from the stakeholders received during these meetings were already addressed orally and in written by TS Discoms. Some of the stakeholders like CESS Siricilla, M/s PTC India, Mytrah Vayu (Godavari) Ltd., and representative of STU & person nominated by Hon'ble TSERC under clause 5.3(n) – Chief Engineer/ Transmission have expressed that they are in line with the views of TS Discoms and that the levy of Grid Support Charges is justified. Hence, TS Discoms request Hon'ble Commission to approve the proposal for levy of Grid Support Charges. TS Discoms would abide by the directions of Hon'ble Commission in this regard.
16	The Objector reserves its right to make additional objections or revise or supplement the present objections.	

Replies to the Objections/Suggestions raised on ARR & FPT for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 by Sri Vinod Kumar Agarwal, General Secretary, Regd. Office: Flat No.101, 1stFloor, Satya Sarovar Aparment, Ghansi Bazar, Near High Court, Hyderabad-500002.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>STATEMENT OF OBJECTIONS</p> <p>The Distribution Licensees namely Southern Power Distribution Company of Telangana Limited and Northern Power Distribution Company of Telangana Limited (hereinafter referred to as the 'Discoms' or 'TS Discoms' or 'Petitioners' or 'distribution companies' or 'Licensees') have filed the Petitions for Power Purchase True up for FY 2016-17 to FY 2022-23 for the Retail Supply Business 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>These filings have been taken on record by Hon'ble Commission from O.P. No.82 of 2022 to O.P. No. 88 of 2022 for TSSPDCL and from O.P. No. 89 of 2022 to O.P. No. 95 of 2022 for TSNPDCL</p> <p>This Statement of Objections is being filed on behalf of 'The South Indian Cement Manufacturers' Association (SICMA)', an Association registered under Telangana Societies Registration Act 2001 at Hyderabad, its members being major Cement Manufacturers across South India (hereinafter called the —'Objector'. The main function of SICMA is to promote and protect the interests of its members in relation to the commerce & industries of India and in particular, the commerce & industries connected with cement. The members of the association are availing power supply from the licensees across the State of Telangana, predominantly at 132/220 KV voltage and few of them avail supply at 33 KV voltage.</p>	No Comments

	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.	
	The South Indian Cement Manufacturers' Association (Objector) strongly objects to the Filing of the ARR for the Retail Supply Business for FY 2022-2023 respectively (herein after referred to as the 'Tariff Petitions' or 'Petitions') and prays that the submissions and objections made herein may be accepted and approved by the Hon'ble Commission, in the interest of justice and equity	TS Discoms submit that the instant Petitions viz. O.P. No.80 of 2022 to O.P. No. 81 of 2022 for TSNPDCL & TSSPDCL deals about the ARR for the Retail Supply Business for FY 2023-2024 respectively.
	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. The brief facts, propositions, analysis, grounds and point wise objections to the Petitions are narrated herein below:	No Comments
1	AVERAGE COST OF SUPPLY (2022-23 VS 2023-24) i. In the instant Petitions, Licensees have projected a higher average cost of service than the approved in last Retail Supply order for the FY 2022-23. A comparison of the Average Cost of Supply (ACoS) claimed against that approved by Hon'ble Commission in the FY 2022-23 and also the provisional data for FY 2023-24 is shown below:	T The actual ACoS for FY 2021-22 for Telangana state is Rs. 7.32/kWh. The ARR projections by TS Discoms are done based on the actuals of FY 2021-22 and H1 of FY 2022-23 and estimated figures for H2 of FY 2022-23. Hence the projected ACoS for Telangana state for FY 2023-24 i.e., Rs. 7.33/kWh is only 0.1% increase over actual ACoS of FY 2021-22. Moreover, the Distribution cost and Transmission cost for FY 2023-24 which are components of ACoS were taken from the Distribution MYT Order for 4 th Control Period and Transco Transmission MYT Order for 4 th Control Period both approved by Hon'ble TSERC. The Distribution cost for FY 2023-24 is increased by 12% over the distribution cost approved by Hon'ble TSERC for FY 2022-23 and the Transmission cost for FY 2023-24 is also



ii. It is humbly pointed out from the charts that Licensees have projected an increase of around 4-6 % in the Average Cost of Supply (ACoS) for FY 2023-24 over the approved figure for FY 2022-23 respectively.

increased by 12% over the approved numbers for FY 2022-23.
Hence the overall ACoS for Telangana for FY 2023-24 has increased by 4% over FY 2022-23.

2 AGGREGATE REVENUE REQUIREMENT (ARR) CLAIMED BY TELANGANA DISCOMS FOR FY 2023-24

i) The TSSPDCL and TSNPDCL has projected an Annual Revenue Requirement of Rs. 36,963.20 Crores and Rs. 17,095.16 Crores respectively for FY 2023-24. The ARR along with its treatment proposed by the TSSPDCL and TSNPDCL is provided in the table below:

Particulars	TSSPDCL	TSNPDCL	TOTAL
Transmission Cost	2,670.27	1,126.29	3,796.56
SLDC Cost	32.81	13.69	46.50
Distribution Cost	5,168.36	4,081.42	9,249.78
PGCIL & ULDC Expenses	1,081.98	451.19	1,533.17
Network and SLDC Cost (A)	8,953.42	5,672.60	14,626.02

No Comments

Power Purchase / Procurement Cost	27,654.99	11,310.21	38,965.20
Interest on Consumer Security Deposits	311.96	81.08	393.04
Supply Margin in Retail Supply Business	42.83	31.27	74.10
Other Costs if any	-	-	-
Supply Cost (B)	28,009.78	11,422.56	39,432.34
Aggregate Revenue Requirement (A+B)	36,963.20	17,095.16	54,058.35
Non-Tariff Income	28.18	33.81	61.98
Net Revenue Requirement	36,935.02	17,061.35	53,996.37
Total Revenue	33,724.37	9,737.70	43,462.07
Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)	33,521.34	9,737.70	43,259.04
Revenue from Cross Subsidy Surcharge	100.80	-	100.80
Revenue from Additional Surcharge	102.23	-	102.23
Revenue Deficit(-)/Surplus(+) at Current Tariffs	-3,210.64	-7,323.65	-10,534.30
Government Subsidy u/s 65 of the Electricity Act, 2003	-	-	-
Net gap – Deficit(-)/Surplus(+)	-3,210.64	-7,323.65	-10,534.30

	<p>ii) The Objections in respect of the ARR projected by the Petitioners for FY 2023-24 are summarised below:</p>																																	
<p>3</p>	<p>SALES PROJECTIONS:</p> <p>i) The Petitioners, in the instant petitions have escalated sales quantum for HTIV (A) Lift Irrigation & Agriculture at 132 kV for FY 2023-24 by 108%-298% against over the estimated values of FY 2022-23:</p> <table border="1" data-bbox="262 488 1230 651"> <thead> <tr> <th>TSSPDCL</th> <th>FY 22</th> <th>FY 23</th> <th>FY 24</th> </tr> <tr> <th>HT Category at 132 KV</th> <th>Actuals</th> <th>Estimates</th> <th>Estimates</th> </tr> </thead> <tbody> <tr> <td>HT-IV A Lift Irrigation & Agriculture (MUs)</td> <td>1877.73</td> <td>1821.45</td> <td>3786.40</td> </tr> <tr> <td>Percentage Increase (%)</td> <td></td> <td>-3%</td> <td>108%</td> </tr> </tbody> </table> <table border="1" data-bbox="262 711 1230 873"> <thead> <tr> <th>TSNPDCL</th> <th>FY 22</th> <th>FY 23</th> <th>FY 24</th> </tr> <tr> <th>HT Category at 132 KV</th> <th>Actuals</th> <th>Estimates</th> <th>Estimates</th> </tr> </thead> <tbody> <tr> <td>HT-IV A Lift Irrigation & Agriculture (MUs)</td> <td>1792.65</td> <td>932.08</td> <td>3712.74</td> </tr> <tr> <td>Percentage Increase (%)</td> <td></td> <td>-48%</td> <td>298%</td> </tr> </tbody> </table>	TSSPDCL	FY 22	FY 23	FY 24	HT Category at 132 KV	Actuals	Estimates	Estimates	HT-IV A Lift Irrigation & Agriculture (MUs)	1877.73	1821.45	3786.40	Percentage Increase (%)		-3%	108%	TSNPDCL	FY 22	FY 23	FY 24	HT Category at 132 KV	Actuals	Estimates	Estimates	HT-IV A Lift Irrigation & Agriculture (MUs)	1792.65	932.08	3712.74	Percentage Increase (%)		-48%	298%	
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	<p>ii) The Petitioners have submitted that the reason for such increase is as follows: <i>“Lift Irrigation (LI) Schemes: The Telangana government has initiated the ambitious Kaleshwaram lift irrigation project along with the existing ones, to meet the needs of the agriculture consumers in the State. The growth trend in this category has many variations due to variations in the operation of Lift Irrigation pumps based on rainfall, water levels in reservoirs, etc. The sales in H1 of FY22-23 recorded a negative growth rate due to heavy rains in monsoon period. Further, due to heavy floods in August month the LIS pumps are not operated in H1 of FY 2022-23. Licensee has considered the expected additional loads and energy requirement for FY 2023-24 based on the information received from the I&CAD, which was further duly analyzed and moderated considering the</i></p>	<p>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>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 & Godavari river and upcoming additional loads. These loads are further</p>																																

	<i>licensee's experience of the historical consumption along with other allied factors."</i>																																								
	<p>iii) However, it is submitted that the project status of Kaleshwaram lift irrigation project is uncertain and that the high projections made by the Petitioners for Lift Irrigation category are highly optimistic. This can be inferred from several articles in LiveLaw and Hindustan Times that there is uncertainty regarding the fate of the Kaleshwaram lift irrigation project. The same have been annexed herewith as Annexure-II.</p>	<p>considered to be operating only at a 60% load factor by I&CAD department. However, TS Discoms, based on their analysis and historical experience have only considered half (50%) of the projections given by I&CAD department for HT 132 KV LIS category.</p> <p>Hence, the objector's computation of requirement by considering lesser LIS sales is not correct.</p>																																							
	<p>iv) Therefore, the Objector has recomputed the power purchase requirement for FY 2023-24 by considering the actuals sales corresponding to HT IV (A) category in FY 2021-22:</p> <table border="1" data-bbox="247 659 1230 1263"> <thead> <tr> <th colspan="3">Power Purchase Requirement (MUs) for FY 2023-24 as per Objector</th> </tr> <tr> <th>Particulars</th> <th>TSSPDCL</th> <th>TSNPDCL</th> </tr> </thead> <tbody> <tr> <td>Total Sales, MU</td> <td>50,444.21</td> <td>19,345.26</td> </tr> <tr> <td>Sales (LT, 11kV, 33kV) (MU)</td> <td>42,049.43</td> <td>16,213.63</td> </tr> <tr> <td>EHT Sales (MU)</td> <td>8,394.78</td> <td>3,131.63</td> </tr> <tr> <td>Total Losses, MU</td> <td>6,593.90</td> <td>2,752.89</td> </tr> <tr> <td>Distribution System Losses (MU)</td> <td>4,478.42</td> <td>1,927.25</td> </tr> <tr> <td>Transmission System Losses (MU)</td> <td>2,115.49</td> <td>825.63</td> </tr> <tr> <td>Total Losses, (%)</td> <td>11.56</td> <td>12.46</td> </tr> <tr> <td>Transmission Losses (%)</td> <td>3.71</td> <td>3.74</td> </tr> <tr> <td>Distribution System Losses (%)</td> <td>9.63</td> <td>10.62</td> </tr> <tr> <td>Input to Distribution System</td> <td>46,527.85</td> <td>18,140.88</td> </tr> <tr> <td>Power Purchase Requirement (MU)</td> <td>57,038.11</td> <td>22,098.15</td> </tr> </tbody> </table>	Power Purchase Requirement (MUs) for FY 2023-24 as per Objector			Particulars	TSSPDCL	TSNPDCL	Total Sales, MU	50,444.21	19,345.26	Sales (LT, 11kV, 33kV) (MU)	42,049.43	16,213.63	EHT Sales (MU)	8,394.78	3,131.63	Total Losses, MU	6,593.90	2,752.89	Distribution System Losses (MU)	4,478.42	1,927.25	Transmission System Losses (MU)	2,115.49	825.63	Total Losses, (%)	11.56	12.46	Transmission Losses (%)	3.71	3.74	Distribution System Losses (%)	9.63	10.62	Input to Distribution System	46,527.85	18,140.88	Power Purchase Requirement (MU)	57,038.11	22,098.15	
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4	<p>POWER PURCHASE COST:</p> <p>A. TSGENCO Thermal Power Stations:</p>																																								

<p>i) It is submitted that the fixed cost recovery of thermal generating stations is based on the availability declared by them i.e. Plant Availability Factor (PAF).</p>	
<p>ii) The latest TSGENCO Tariff Order for 4th control period was issued on 22.03.2022 and the Fixed Charges for FY 2023-24 has been approved subjected to normative plant availability.</p>	
<p>iii) The Petitioner has claimed the complete fixed charges for TSGENCO stations as approved in TSGENCO MYT order dt. 22.03.2022 without showing any linkage with plant availability nor submitted any details about the same. Further, in this regard it is important to mention that since no true-up has been conducted for TSGENCO stations after FY 2019, hence it cannot be ascertained if the actual availability of the TSGENCO stations has been up to the normative level to enable complete fixed charge recovery as approved by the Hon'ble TSERC.</p>	<p>Projecting Fixed charges as per net availability by considering Plant load factor as given by objector is incorrect. TSDISCOMS projected the Fixed Charges of TSGENCO Thermal Stations as per Hon'ble TSERC approved TS GENCO MYT Order for 4th Control period and Variable charges by considering the base ECR rate computed by the Hon'ble Commission in 4th Control Period.</p>
<p>iv) Additionally, TS Discoms has considered the capacity allocation from YTPS Unit I & II for FY 2023-24. The units YTPS I and YTPS II are expected to be commissioned on 1st Dec 2023 and 1stFeb 2024. The Hon'ble commission in its TSGENCO MYT order dt. 22.03.2022 has directed the TSGENCO to submit the proposal for determination of capital cost and Tariff for YTPS. The relevant extract and directive issued from the TSGECO MYT order dt. 22.03.2022 are reproduced below for reference:</p> <p><i>5.3.36 The Commission has discussed capital cost and capitalisation schedule of BTPS in detail in the subsequent Chapter of this Order. However, it is to be noted that the Commission has approved the capitalisation of BTPS only from the CoD of the Station as against the submission of TSGenco. Hence, the capitalisation approved for BTPS is from FY 2020-21 against the capitalisation submitted by TSGenco for FY 2019-20. The Commission noted that TS Genco submitted the <u>capital investment for YTPS (new station) in the Capital Investment Plan; however, TSGenco has not sought determination of capital cost & tariff for YTPS in the</u></i></p>	<p>The TS Discoms have considered the projections for availability of power quantum and the cost of power purchase from YTPS units 1 & 2 as per the Commissioning Dates as communicated by TS Genco in consultation with CMD Genco & Transco in November 2022 (during ARR & FPT filing).</p> <p>Hence, the YTPS Unit 1 availability is considered from Dec'22 and YTPS Unit 2 availability is considered from Feb'23 and the fixed cost and variable costs for these months were considered as received from TS Genco.</p>

<p><u><i>Petition. Therefore, the Commission has not considered the approval of capital cost for YTPS while approving the investment plan for FY 2019-20 to FY 2023-24. The Commission directs TSGenco to submit the proposal for determination of capital cost and Tariff for YTPS before its CoD as per the Regulations No.1 of 2019.</i></u></p> <p>"New Directives</p> <p>6. Scheme-wise Details of Capital Cost for New Stations</p> <p><i>The Commission directs TS Genco to submit the proposal for final capital cost and revised tariff for BTPS after commissioning of the final unit. The Commission also directs TS Genco to submit the proposal for determination of capital cost and Tariff for YTPS before its CoD as per the Regulations No.1 of 2019. TS Genco shall submit the scheme-wise capitalisation for new plants, viz., KTPS-VII, BTPS and YTPS with Financial Package, Time and Cost over-run for each station along with proper quantification of the cost over-run, justification for the time over-run and Financial Package-wise undischarged liabilities as on COD of the respective plant while filing the MTR Petition."</i></p>	
<p>v) To the best of our knowledge, the MTR filing dt. 30.11.2022 made by TSGENCO and information available on TSGENCO website do not provide any details/status about the YTPS capital cost approval and Tariff determination. Even the commissioning date of the units are in Dec'23 and Feb' 24.</p>	
<p>vi) In light of the above, the Objector has not considered any power procurement (MUs) from YTPS for computation of power purchase cost for FY 2023-24.</p>	
<p>vii) The detailed computation of Fixed cost for TSGENCO thermal station for both discoms as per Objector's Assessment is shown below:</p> <p>Disallowance Proposed in Fixed cost of TSGENCO Thermal as per Objector's Assessment</p>	

(All Figures in Crores)

Particulars	TSSPDCL	TSNPDCL	Total
Petitioner's Claim	4,004.21	1,671.49	5,675.70
Objector Assessment	3,439.16	1,435.60	4,874.76
Disallowance Proposed	565.05	235.89	800.94

TS Discoms have responded to the item-wise objections/suggestions 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.

Station	Plant Capacity	Net Availability	Normative Availability to be Considered as per Objector	Energy Dispatch	Fixed Cost approved in Tariff Order	Fixed Cost as per Petitioner	Fixed Cost as per Objector's Assessment
	MW	%	%	MU	INR Crore	INR Crore	INR Crore
TSGENCO Thermal							
KTPS D	500	73.00%	80.00%	3,197.39	381.03	381.03	347.69
KTPS Stage VI	500	74.00%	80.00%	3,250.14	517.45	517.46	478.64
RTS B	62.5	68.00%	80.00%	370.60	117.35	117.34	99.75
Kakatiya Thermal	500	74.00%	80.00%	2,796.89	416.04	416.03	384.84

Power Plant Stage I								
Kakatiya Thermal Power Plant Stage II	600	75.00%	80.00%	3,921.2 2	710.49	710.48	666.08	
BTPS - unit 1	270	78.00%	80.00%	1,844.5 7	473.55	473.55	461.71	
BTPS - unit 2	270	78.00%	80.00%	1,844.5 7	473.55	473.55	461.71	
BTPS - unit 3	270	78.00%	80.00%	1,844.5 7	473.55	473.55	461.71	
BTPS - unit 4	270	78.00%	80.00%	1,844.5 7	473.55	473.55	461.71	
Yadradri - TPS - I	800	79.00%	NA	1,841.1 8	NA	400.80	-	
Yadradri - TPS - II	800	79.00%	NA	905.50	NA	200.40	-	
KTPS VII	800	81.00%	80.00%	5,659.5 3	1,037. 97	1,037. 97	1,050.94	
Total TSGENCO Thermal	564 2.5			29,320 .74	5,074. 52	5,675. 70	4,874.78	
B. Central Generating Stations:								
i. It is pointed out that the Hon'ble Commission has not considered any capacity allocation from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. For FY 2023-24 in line with the earlier directions of the Commission in RST Orders for FY								

2017-18 and FY 2018-19. The relevant extracts from the past RST orders have been reproduced below for reference:

The Hon'ble Commission in its RST Order dt. 26.08.2017 for FY 2017-18 has stated as follows:

"3.3.17 To reduce the financial burden upon them, the Licensees submitted a requisition to Gol expressing its willingness to surrender the share of Telangana State from NTECL Vallur TPS. In view of the requisition made by the Licensees, the Commission also observes that NLC Tamil Nadu Power Ltd. is also a similar project with high cost of generation. The Commission thus directs the DISCOMs to surrender the allocated share of Telangana State in NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. Hence the Commission in this Order, has not considered the energy availability from these generating stations from 01.08.2017 onwards."

(Emphasis supplied)

The Hon'ble Commission in its RST Order dt. 27.03.2018 for FY 2018-19 has stated as follows:

"3.3.18 The Commission in its Tariff Order for FY 2017-18 dated 26.08.2017 directed the DISCOMs to surrender the allocated share of Telangana State in NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. and accordingly, had not considered the energy availability from these stations from 01.08.2017. The DISCOMs submitted that in response to their request for re-allocation of the share of Telangana State in NTECL Vallur TPS, there is no confirmation from the Ministry of Power, Gol to that effect. The DISCOMs also submitted that the re-allocation of the share in NLC Tamil Nadu Power Ltd. will be taken up after the re-allocation of share in NTECL Vallur TPS. The Commission observed that the DISCOMs are procuring power from NTECL Vallur TPS and NLC Tamil Nadu

The projection of availability and cost for the CGS generators (NTECL Vallur TPS and NLC Tamil Nadu Power Ltd) are based on the allocation by **Central Govt.** and availability received from respective power plant.

The Licensees submitted a requisition to MOP, Gol expressing its willingness to **surrender** the share of Telangana State from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. and it is under process.

PowerLtd. in FY 2017-18 and have proposed in FY 2018-19 also. In light of the directions in the Tariff Order for FY 2017-18, the Commission has not considered the share allocation to Telangana State from NTECLVallur TPS and NLC Tamil Nadu Power Ltd. for FY 2018-19.

(Emphasis supplied)

ii) The Hon'ble Commission in its RST order dt.23.03.2022 for FY 2022-23 has approved Power Purchase as follows by disallowing any Power Procurement from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd.:

Table 4-15 Power procurement cost from Central Generating Stations for FY 2022-23

Source	Claimed				Approved			
	Quantum MU	Fixed Cost Rs.crore	Variable Cost Rs.crore	Total Rs.crore	Quantum MU	Fixed Cost Rs.crore	Variable Cost Rs.crore	Total Rs.crore
Thermal								
NTPC Ramagundam Stage I & II	2683.01	188.60	690.63	879.22	2716.15	181.22	699.16	880.38
NTPC Ramagundam Stage III	721.42	57.15	182.20	239.35	729.22	53.89	184.17	238.06
NTPC Talcher TPS II	1638.93	117.79	284.28	402.07	1598.29	110.39	277.23	387.62
NTPC Simhadri Stage I	2251.89	478.57	707.56	1186.13	3672.35	356.75	1153.88	1510.63
NTPC Simhadri Stage II	1298.23	230.24	398.51	628.75	1765.35	245.11	541.91	787.02
NTPC Kudgi	1017.12	319.88	348.05	667.92	1751.40	294.24	599.31	893.55
NLC TPS II Stage I	395.60	27.08	104.54	131.63	385.93	28.10	101.99	130.09
NLC TPS II Stage II	710.07	50.12	187.82	237.95	692.64	52.26	183.21	235.47
NNTPP	402.72	68.24	88.03	156.28	392.73	78.22	85.84	164.06
TSSTPP Unit 1	3499.63	790.92	794.42	1585.33	3412.84	711.82	774.72	1486.54
NTECL Vallur TPS	834.63	135.00	245.48	380.48	0.00	0.00	0.00	0.00
NLC Tamil Nadu Power Ltd.	1068.60	188.57	283.77	472.34	0.00	0.00	0.00	0.00
Sub Total	16521.83	2652.16	4315.29	6967.45	17116.91	2112.01	4601.41	6713.42
Nuclear								

iii) Despite clear past directives/methodology of the Hon'ble Commission, the TS Discoms have sought to procure power from these stations. It is humbly requested that the Hon'ble Commission may penalise the Discoms for not adhering to the directives specified.

<p>iv) The Objector in line with the Hon'ble Commission past followed methodology/directives has not considered any capacity allocation from these two generating stations for power purchase computation. It is prayed that the Hon'ble TSERC may do the same.</p>	
<p>C. Interest on Pension bonds: i) The Petitioners i.e. TSSPDCL & TSNPDCL have claimed an amount of Rs. 972.86 Crores and Rs. 406.11 Crores respectfully towards interest on Pension bonds for FY 2023-24.</p>	<p>No Comments</p>
<p>ii) It is a set principle that pension funds have to be maintained from the contributions of the management & employees and should be used appropriately to earn interest thereon. iii) It is inappropriate to load the inefficiency of erstwhile APSEB in managing funds on the end consumers in the form interest on Pension Bonds.</p>	
<p>iv) The Hon'ble Commission in its TSGENCO MYT Order dt. 22.03.2022 has also acknowledged the same i.e. additional burden of pension bonds should be funded by the Government of Telangana. The Hon'ble Commission Directive as per order dt. 22.03.2022 in this regard is reproduced below:</p> <p><i>“New Directives</i> 10. Liabilities on pension bonds The Commission directs TS Genco to extract the request of the stakeholder that the Government of Telangana shall bear the additional burden of pension bonds and communicate to the <i>Principal Secretary, Energy, GoTS for favourable consideration.”</i> (Emphasis supplied)</p>	

	<p>v) Therefore, it is prayed that the claim of the Petitioners towards Interest on Pension Bonds may be disallowed and may be borne by the Government of Telangana.</p>																	
	<p>D. Sale of Surplus Power: i) The Objector, after assessing the actual power purchase requirement for both discoms for FY 2023-24 (same has been discussed in detail in section 4 pertaining to sales projection in this report) and despatching the power in an economical manner has worked out the actual surplus/deficit (MUs) scenario for FY 2023-24.</p>		<p>TS Discoms have not considered any sale of surplus power in FY 2023-24 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>ii) For computation purpose following parameters discussed above are taken in consideration: i) Zero Despatch from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd; ii) Zero Capacity allocation from YTPS I & II; iii) Economical Power despatch in accordance to reduced power purchase requirement.</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.</p>															
	<p>iii) Taking into account the above, the Objector has computed the actual overall energy scenario for FY 2023-24:</p> <table border="1" data-bbox="222 824 1249 1289"> <thead> <tr> <th data-bbox="222 824 898 915">Particulars for FY 2023-24</th> <th data-bbox="898 824 1094 915">TSSPDCL</th> <th data-bbox="1094 824 1249 915">TSNPDCL</th> </tr> </thead> <tbody> <tr> <td data-bbox="222 915 898 1006">Energy Availability (MUs)</td> <td data-bbox="898 915 1094 1006">65,750.47</td> <td data-bbox="1094 915 1249 1006">28,056.71</td> </tr> <tr> <td data-bbox="222 1006 898 1097">Energy Requirement (MUs)</td> <td data-bbox="898 1006 1094 1097">55,100.32</td> <td data-bbox="1094 1006 1249 1097">21,289.25</td> </tr> <tr> <td data-bbox="222 1097 898 1188">Surplus/deficit (MUs)</td> <td data-bbox="898 1097 1094 1188">10,650.14</td> <td data-bbox="1094 1097 1249 1188">6,767.46</td> </tr> <tr> <td data-bbox="222 1188 898 1289">Average of MCP for FY 22 and H1 of FY 23 (Rs/kWh)</td> <td data-bbox="898 1188 1094 1289">5.17</td> <td data-bbox="1094 1188 1249 1289">5.17</td> </tr> </tbody> </table>		Particulars for FY 2023-24	TSSPDCL	TSNPDCL	Energy Availability (MUs)	65,750.47	28,056.71	Energy Requirement (MUs)	55,100.32	21,289.25	Surplus/deficit (MUs)	10,650.14	6,767.46	Average of MCP for FY 22 and H1 of FY 23 (Rs/kWh)	5.17	5.17	<p>The details of quantum of surplus sale and revenue earned, from FY 2016-17 to FY 2022-23, have already been submitted to the Hon'ble Commission, as part of the Additional information requested.</p> <p>The calculation of the objector regarding the overall energy scenario is not correct for the following reasons:</p> <p>i. Zero Despatch from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd; - As responded in above section, until the surrender request for share allocated by Central Govt is not finalized, TS Discoms cannot project zero dispatch from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd.</p> <p>ii. Zero capacity allocation from YTPS -</p>
Particulars for FY 2023-24	TSSPDCL	TSNPDCL																
Energy Availability (MUs)	65,750.47	28,056.71																
Energy Requirement (MUs)	55,100.32	21,289.25																
Surplus/deficit (MUs)	10,650.14	6,767.46																
Average of MCP for FY 22 and H1 of FY 23 (Rs/kWh)	5.17	5.17																

	Revenue generated by Sale of Surplus Power (Rs. Crores)			5,503.19	3,496.91	iii. Economical power desptch – The Energy requirement projections made by the objector are incorrect as they have projected lesser sales for LIS category.			
iv) The Summary of Disallowances in Power Purchase Cost as per the Objector’s Assessment is summarized below:									
Power Purchase Cost as per Petitioner's Claim									
Particulars	State			TSSPDCL			TSNP DCL		
	2023-24			2023-24			2023 -24		
	PP MU	PP Cost (INR Cr.)	PP Cost (INR/k Wh)	PP MU	PP Cost (INR Cr.)	PP Cost (INR/k Wh)	PP MU	PP Cost (INR Cr.)	PP Cost (INR/k Wh)
<i>TSGENCO Thermal</i>	29,320.74	13,418.89	4.58	20,685.78	9,467.03	4.58	8,634.96	3,951.86	4.58
<i>TSGENCO Hydel</i>	5,414.41	1,317.51	2.43	3,819.87	929.50	2.43	1,594.54	388.01	2.43
<i>CGS stations</i>	22,809.96	10,151.81	4.45	16,013.11	7,162.11	4.47	6,796.85	2,989.71	4.40
<i>APGPCL</i>	-	-	-	-	-	-	-	-	-
<i>IPPs (Thermal)</i>	2,650.58	2,207.19	8.33	1,869.99	1,557.17	8.33	780.60	650.02	8.33
<p>TS Discoms have gone through the detailed computations done by the objector in their Annexures.</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 2023-24, 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 FY2023-24, 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.</p>									

	<i>Power Tech)</i>									
	NCES	11,959.28	5,187.70	4.34	8,006.78	3,574.00	4.46	3,952.50	1,613.70	4.08
	Singareni I & II	1,098.04	759.82	6.92	-	-	-	1,098.04	759.82	6.92
	Thermal Power Tech	2,630.44	1,820.21	6.92	2,630.44	1,820.21	6.92	-	-	-
	CSPGCL	2,009.88	783.85	3.90	-	-	-	2,009.88	783.85	3.90
	Thermal Power Tech Unit II	4,814.85	1,877.79	3.90	4,814.85	1,877.79	3.90	-	-	-
	Other Short Term Sources	135.56	61.46	4.53	95.64	43.36	4.53	39.92	18.10	4.53
	D-D purchase/sale	-	-	3.02	814.52	250.96	3.08	-814.52	250.96	3.08
	Interest on Pension Bonds	-	1,378.97	-	-	972.86	-	-	406.11	-

	Total PP Cost	82,843.75	38,965.20	4.70	58,750.98	27,654.99	4.71	24,092.77	11,310.21	4.69
	Sale of Surplus Power	-	-	-	-	-	-			
	Net PP Cost	82,843.75	38,965.20	4.70	58,750.98	27,654.99	4.71	24,092.77	11,310.21	4.69
Power Purchase Cost as per Objector's Assessment										
Particulars	State			TSSPDCL			TSNPDCL			
	2023-24			2023-24			2023-24			
	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)	
<i>TSGENCO Thermal</i>	26,574.06	11,829.61	4.45	18,748.00	8,345.81	4.45	7826.06	3,483.81	4.45	
<i>TSGENCO Hydel</i>	5,414.41	1,317.51	2.43	3,819.87	929.50	2.43	1,594.54	388.01	2.43	
<i>CGS stations</i>	19,748.98	9,134.20	4.63	14,792.83	6,288.66	4.25	4,956.15	2,845.55	5.74	
<i>APGPCL</i>	-	-	-	-	-	-	-	-	-	
<i>IPPs (Thermal)</i>	2,496.65	2,207.19	8.84	1,869.99	1,557.17	8.33	626.67	650.02	10.37	

<i>Power Tech)</i>										
NCES	11,959.28	5,187.70	4.34	8,006.78	3,574.00	4.46	3,952.50	1,613.70	4.08	
Singareni I & II	1,098.04	759.82	6.92	-	-	-	1,098.04	759.82	6.92	
Thermal Power Tech	2,137.86	1,663.13	7.78	2,137.86	1,663.13	7.78	-	-	#DIV/0!	
CSPGCL	2,009.88	783.85	3.90	-	-	-	2,009.88	783.85	3.90	
Thermal Power Tech Unit II	4,814.85	1,877.79	3.90	4,814.85	1,877.79	3.90	-	-	#DIV/0!	
Other Short Term Sources	135.56	61.46	4.53	95.64	43.36	4.53	39.92	18.10	4.53	
D-D purchase/sale	-	106.13	-	814.52	350.49	4.30	-814.52	-244.36	3.00	
Interest on Pension Bonds	-	-	-	-	-	-	-	-	-	

	Total PP Cost	76,389.58	34,928.40	4.57	55,100.32	24,629.90	4.47	21,289.25	10,298.49	4.84	
	Sale of Surplus Power	-17,417.60	-8,999.67	-	-10,650.14	-5,502.93	5.17	-6,767.46	-3,496.75	5.17	
	Net PP Cost	58,971.98		4.57	44,450.18	19,126.98	4.30	14,521.79	6,801.75	4.68	
	Particulars		Disallowances in Power Purchase Cost claimed by the Petitioners as per Objector's Assessment (INR Crores)								
				State	TSSPDCL	TSNPDCL					
				<i>TSGENCO Thermal</i>	-1,589.28	-1,121.22		-468.06			
				<i>TSGENCO Hydel</i>	-	-		-			
				<i>CGS stations</i>	-1,017.61	-873.45		-144.16			
				<i>APGPCL</i>	-	-		-			
				<i>IPPs</i>	-	-		-			
				<i>NCEs</i>	-	-		-			
				<i>Singareni I & II</i>	-	-		-			
				<i>Thermal Power Tech</i>	-157.08	-157.08		-			
				<i>CSPGCL</i>	-	-		-			
				<i>Thermal Power Tech Unit II</i>	-	-		-			
				<i>Other Short Term Sources</i>	-	-		-			
				<i>D-D purchase/ sale</i>	106.13	99.53		6.61			
				<i>Interest on Pension Bonds</i>	-1,378.97	-972.86		-406.11			

		Total PP Cost	-4,036.81	-3,025.09	-1,011.72	
		Sale of Surplus Power	-8,999.67	-5,502.93	-3,496.75	
		Net PP Cost	-13,036.48	-8,528.01	-4,508.47	
	V) Hence, it is prayed that the Hon'ble Commission may allow the Power Purchase cost of Rs. 25,928.72 Crores for FY 2023-24 as per Objector's Assessment.					
5	NON-TARIFF INCOME:					The details of Non-tariff income as per audited accounts and the segregation of accounts between distribution and retail supply business for FY 2021- 22 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 2022- 23and FY 2023-24are clearly mentioned under para no. 5.2 of Chapter – 5 and para no. 6.2 of chapter 6 in the ARR & Tariff Proposals of TSSPDCL and TSNPDCL respectively. 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.
	i) TSSPDCL and TSNPDCL have claimed NTI towards Retail Supply Business to the tune of Rs. 28.18 Crores and Rs. 33.81 Crores for FY 2023-24, 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.					
	ii) As per the latest available Audited Accounts of Q1 & Q2 for FY 2022-23 pertaining to TSSPDCL and TSNPDCL, the NTI booked for Retail Business is Rs. 70.20 Crores and Rs. 127.33 Crores respectively which are far more than the projected NTI.					
	iii) Assuming the overall NTI on the basis of the latest Audited Accounts for both Discoms, the Objector has arrived at Rs. 265.29 Crores as NTI for both Discoms for FY 2023-24 for Retail Supply Business.					
	Objector Assessment of Non-Tariff Income for FY 2023-24					
	<i>(All Figures in Rs. Crores)</i>					
		TSSPDCL		TSNPDCL		Total
	Non-Tariff Income	Actuals H1	Objector's Assessment	Actuals H1	Objector's Assessment	Actuals H1 Objector's Assessment

Particulars	2022-23	2023-24	2022-23	2023-24	2022-23	2023-24
As per accounts (A)	70.20	155.94	69.49	137.96	139.69	293.90
Projected by the Petitioner(B)	-	28.18	-	33.81	-	61.99
Balance understated by Petitioner(A-B)	-	-127.76	-	-104.15	-	-231.91
iv) It is respectfully submitted that the Hon'ble Commission may align the NonTariff incomes strictly in line with the audited accounts as per Objector's Assessment and reduce it from the ARR being approved.						
GOVERNMENT OF TELANGANA SUBSIDY:						
i) The Average Cost of Supply (ACoS) as approved in the RST tariff order dt. 23.03.2022 for FY 2022-23 is Rs. 6.80/kWh for TSSPDCL and Rs. 7.57/kWh for TSNPDCL..						
ii) The Average Cost of Supply (ACoS) as computed by the Objector for FY 2023-24 is Rs. 5.61/kWh for TSSPDCL and Rs. 6.44/kWh for TSNPDCL.						
iii) Considering the actual sales to subsidised category of consumers and the average cost to serve, the cost of supplying power to subsidised categories for each discom is worked out. It is observed that there is an additional subsidy requirement of Rs.						
The ACoS calculated by the objector is not correct because they have omitted/ estimated lesser cost for certain items and considered lower sales (mainly by considering lower LIS sales) and the Discoms' responses for the same are already mentioned in above sections.						
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.						

6,018.47 Crores and Rs. 5,367.15 Crores for TSSPDCL and TSNPDCL respectively for FY 2023-24.

iv) The computations for the same are provided in the tables below: **Subsidy requirement for TSSPDCL for FY 2023-24**

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)	10,547.46	5.61	5,912.95	5,775.11	137.84
LT Agriculture	10,590.92	5.61	5,937.32	56.69	5,880.63
Total	21,138.39		11,850.27	5,831.80	6,018.47

Subsidy requirement for TSNPDCL for FY 2023-24

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	$E = C - D$

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

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

	LT (Domestic)	4,234.41	6.44	2,724.85	1,999.52	725.34	
	LT Agriculture	7,290.39	6.44	4,691.39	49.57	4,641.81	
	Total	11,524.79		7,416.24	2,049.09	5,367.15	
	<p>*Note: The ACoS as computed by the Objector has been provided in the forthcoming sections.</p>						
	<p>v) The Objector humbly submits that the Hon'ble Commission may consider the shortfall of subsidy receivable from the State of Telangana for FY 2023-24 and allow the same in the instant proceedings towards the ARR for FY 202324 in line with the Section 65 of the Electricity Act, 2003.</p>						
	<p>8 URGENT NEED FOR CROSS SUBSIDY AND TARIFF RATIONALIZATION:</p> <p>i) The Objector submits 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.</p> <p>ii) The National Tariff Policy, 2016 stipulates that the cross-subsidy levels are to be kept within the permissible range of $\pm 20\%$ of the Cost of Supply. It is submitted that the Hon'ble Appellate Tribunal for Electricity (Hon'ble APTEL or Hon'ble Tribunal) has taken cognizance of this and given the following as part of its Findings and Analysis in its Judgement dt. 18.02.2022 in Appeal No. 248 of 2018 (Annexed herewith as Annexure-I):</p> <p><i>"27. We are inclined to record here that State Commission has miserably failed in complying with the directions passed by this Tribunal in various Judgements but</i></p>						<p>TS Discoms have proposed for retaining the tariffs as per the Tariff Order for FY 2022-23 for the ensuing year FY 2023-24 except few proposals/modifications like</p> <ul style="list-style-type: none"> • revision of tariff for LT VII B Wholly Religious Places and introduction of new category for HT wholly religious places, • Green Tariff for all Tariff categories, • introduction of Grid Support charges / Parallel Operation Charges <p>TS Discoms have not proposed for any change in tariff rates except above-mentioned cases and would abide by the directions of Hon'ble Commission in this regard.</p>

also failed to implement the provisions of the Tariff Policy, 2016 which clearly mandates that:

“Clause 8.3(2)

- a) **Separate consumer tariff at each voltage level has to be determined in order to fulfil the mandate of Section 61(g) of the Electricity Act 2003, which is to reflect actual cost of supply;**
- b) Separate consumer tariff at each voltage level is required in order to ascertain the actual cross subsidies built in a consumer's tariff;
- c) Without specifying a separate consumer tariff for consumers connected at each voltage level, a progressive reduction in actual cross subsidies is not possible as the said component is not known;
- d) **The retail/ effective tariff or average billing rate at a particular voltage level cannot exceed more than 20% of the actual cost of supply of a distribution licensee at the said voltage level.**

...

29. In the light of the foregoing paragraphs, it is clear that this Tribunal has, time and again, been consistently held that the State Commissions have to necessarily determine voltage wise tariff depending upon different category of consumers, and the principle of which has also been upheld by the Hon'ble Supreme Court in Punjab State Power Corpn. Ltd. v. Punjab State Electricity Regulatory Commission, (2015) 7 SCC 387 as stated above.

(Emphasis supplied)

iii) Despite such clear mandate from the Hon'ble APTEL and the National Tariff Policy, 2016, the Objector submits that the tariff approved in the RST Order for FY 2022-23 dt. 23.03.2022 has increased the Cross-subsidy level % beyond the permissible range of $\pm 20\%$ as per the Tariff Policy, 2016:

Category	FY 2022-23				
	Sales submitted in Petition (MUs)	Revenue submitted in Petition (Rs. Crores)	ABR (Rs./ kWh)	CoS approved in RST Order for FY23 (Annexure-9) (Rs./kWh)	ABR /Co S (%)
LT Category	12,862.79	3,512.49	2.73		-
Category I (A&B) - Domestic	4,006.42	1,901.08	4.75	7.76	61%
Category II (A,B,C & D) - Non-domestic/Commercial	896.35	1,022.03	11.40	7.46	153%
Category III - Industrial	238.40	224.62	9.42	7.46	126%
Category IV (A&B) - Cottage Industries & Dhobighats	8.54	4.17	4.88	9.76	50%
Category V (A&B) - Irrigation and Agriculture	7,290.39	47.11	0.06	8.34	1%

Category VI (A & B) - Local Bodies, St. Lighting & PWS	359.88	255.68	7.10	9.74	73%
Category VII (A & B) - General Purpose	55.01	48.06	8.74	9.74	90%
Category VIII - Temporary Supply	7.68	9.60	12.49	11.65	107%
Category IX Electric Vehicle Charging Stations	0.13	0.14	10.89	-	0%
HT Category at 11 KV	2,328.96	1,792.31	7.70		-
HT-I Industry Segregated	1,023.79	982.63	9.60	9.13	105%
HT-I (B) Ferro-Alloys	-	-	-	-	-
HT-II - Others	170.28	197.53	11.60	9.55	121%
HT-III Airports, Railways and Bustations	7.69	7.79	10.13	8.25	123%
HT-IVA Lift Irrigation & Agriculture	22.69	25.43	11.21	6.27	179%

HT - IV (B) Composite P.W.S Schemes	151.52	92.71	6.12	6.27	98%
HT-VI Townships and Residential Colonies	8.62	7.59	8.81	12.22	72%
HT -VII Temporary Supply	25.34	37.49	14.80	8.55	173%
HT- VIII RESCO (Siricilla)	919.03	441.14	4.80	6.48	74%
HT-IX Electric Vehicle Charging Stations	-	-	-	10.52	-
HT Category at 33 KV	567.72	422.28	7.44		-
HT-I Industry Segregated	149.71	135.02	9.02	5.96	151%
HT-I (B) Ferro- Alloys	20.87	15.47	7.41	4.72	157%
HT-II - Others	6.72	8.55	12.73	6.67	191%
HT-III Airports, Railways and Bustations	-	-	-	-	-
HT-IVA Lift Irrigation &Agriculture	14.82	19.54	13.18	5.12	257%

HT - IV (B) Composite P.W.S Schemes	342.68	209.15	6.10	5.12	119%
HT-VI Townships and Residential Colonies	26.54	23.44	8.83	5.82	152%
HT -VII Temporary Supply	6.37	11.11	17.44	7.11	245%
TSSNPDCCL	FY 2022-23				
Category	Sales submitted in Petition (MUs)	Revenue submitted in Petition (Rs. Crores)	ABR (Rs./ kWh)	CoS approved in RST Order for FY23 (Annexu re-9) (Rs./kW h)	ABR /Co S (%)
HT-IX Electric Vehicle Charging Stations	-	-	-	-	-
HT Category at 132 KV	2,267.81	1,909.58	8.42		-

HT-I Industry Segregated & HMWSSB	675.89	490.05	7.25	5.29	137%
HT-I (B) Ferro-Alloys	-	-	-	-	-
HT-II - Others	5.53	12.42	22.48	10.50	214%
HT-III Airports, Railways and Bustations	-	-	-	-	-
HT-IVA Lift Irrigation & Agriculture	932.08	967.69	10.38	6.44	161%
HT - IV (C) Composite P.W.S Schemes	26.77	16.34	6.10	6.44	95%
HT-V (A) Railway Traction	523.11	338.70	6.47	5.30	122%
HT-V (B) HMR	-	-	-	-	-
HT-VI Townships and Residential Colonies	103.31	82.92	8.03	4.85	165%
HT -VII Temporary Supply	1.12	1.46	12.96	-	0%
HT-IX Electric Vehicle	-	-	-	-	-

Charging Stations					
Total	18,027.28	7,636.66	4.24	7.57	56%

TSSPDCL		FY 2022-23			
Category	Sales submitted in Petition (MUs)	Revenue submitted in Petition (Rs. Crores)	ABR (Rs. /kWh)	CoS approved in RST Order for FY23 (Annexure-8) (Rs./kWh)	ABR/CoS (%)
LT Category	25,658.95	10,418.55	4.06		-
Category I (A&B) - Domestic	9,977.86	5,468.40	5.48	6.82	80%
Category II (A,B,C & D) - Non-domestic/Commercial	3,050.42	3,477.00	11.40	6.53	175%
Category III - Industrial	933.39	857.92	9.19	6.59	139%

Category IV (A&B) - Cottage Industries & Dhobighats	9.50	4.49	4.73	6.43	74%
Category V (A&B) - Irrigation and Agriculture	11,032.21	54.98	0.05	8.38	1%
Category VI (A & B) - Local Bodies, St. Lighting & PWS	470.19	360.10	7.66	6.40	120%
Category VII (A & B) - General Purpose	89.37	76.84	8.60	7.43	116%
Category VIII - Temporary Supply	95.70	118.54	12.39	9.31	133%
Category IX Electric Vehicle Charging Stations	0.30	0.27	8.95	6.16	145%
HT Category at 11 KV	6,570.40	6,643.99	10.11		-
HT-I Industry Segregated	4,189.20	4,003.72	9.56	7.64	125%
HT-I (B) Ferro-Alloys	0.41	0.35	8.58	-	0%
HT-II - Others	1,868.19	2,134.95	11.43	7.36	155%

TSSPDCL	FY 2022-23				
Category	Sales submitted in Petition (MUs)	Revenue submitted in Petition (Rs. Crores)	ABR (Rs. /kWh)	CoS approved in RST Order for FY23 (Annexure-8) (Rs./kWh)	ABR/CoS (%)
HT-III Airports, Railways and Bustations	4.66	4.83	10.38	7.19	144%
HT-IVA Lift Irrigation & Agriculture	40.28	33.61	8.34	6.38	131%
HT - IV (B) Composite P.W.S Schemes	142.17	87.08	6.12	6.38	96%
HT-VI Townships and Residential Colonies	174.38	153.60	8.81	8.13	108%
HT -VII Temporary Supply	146.10	222.66	15.24	8.55	178%
HT- VIII RESCO (Siricilla)	-	-	-	-	-

HT-IX Electric Vehicle Charging Stations	5.02	3.19	6.36	9.50	67%
HT Category at 33 KV	7,499.69	6,618.43	8.82		-
HT-I Industry Segregated	5,960.88	5,199.72	8.72	5.76	151%
HT-I (B) Ferro-Alloys	54.86	43.58	7.94	4.57	174%
HT-II - Others	1,042.40	1,038.55	9.96	5.92	168%
HT-III Airports, Railways and Bustations	-	-	-	-	-
HT-IVA Lift Irrigation & Agriculture	15.18	16.83	11.09	5.53	201%
HT - IV (B) Composite P.W.S Schemes	263.89	161.03	6.10	5.53	110%
HT-VI Townships and Residential Colonies	121.46	103.36	8.51	5.78	147%
HT -VII Temporary Supply	41.03	55.36	13.49	5.84	231%
HT-IX Electric Vehicle	-	-	-	-	-

Charging Stations						
HT Category at 132 KV	7,245.29	5,308.14	7.33			-
HT-I Industry Segregated & HMWSSB	4,205.45	3,086.48	7.34	5.01		146%
HT-I (B) Ferro-Alloys	229.55	183.70	8.00	4.34		184%
HT-II - Others	45.91	44.94	9.79	5.25		186%
HT-III Airports, Railways and Bustations	54.20	47.24	8.72	4.11		212%
HT-IVA Lift Irrigation & Agriculture	1,821.45	1,399.91	7.69	5.76		133%
HT - IV (C) Composite P.W.S Schemes	268.84	164.00	6.10	5.76		106%
HT-V (A) Railway Traction	527.97	317.91	6.02	5.07		119%
HT-V (B) HMR	91.93	63.96	6.96	4.73		147%
HT-VI Townships and Residential Colonies	-	-	-	-		-

	HT -VII Temporary Supply	-	-	-	-	-	
	HT-IX Electric Vehicle Charging Stations	-	-	-	-	-	
	Total	46,974.33	28,989.11	6.17	6.80	91%	
	<p><i>(The orange-highlighted cells indicate the instances where the Average Billing Rate (as submitted in the instant petitions) due to tariff approved in RST Order dt. 23.03.2022, is less than the permissible 80% of the Cost of Supply approved for that category in RST Order dt. 23.03.2022. The pinkhighlighted cells indicate the instances where the Average Billing Rate (as submitted in the instant petitions) due to tariff approved in RST Order dt. 23.03.2022, is greater than the permissible 120% of the Cost of Supply approved for that category in RST Order dt. 23.03.2022.</i></p>						
	iv) The Petitioner has proposed to continue with the same tariff as was approved in the RST Order dt. 23.03.2022, with minor modifications for certain categories.						
	v) The Objector has already demonstrated that such tariff determined is not in accordance to the Hon'ble APTEL's Judgement dt. 18.02.2022 in Appeal No. 248 of 2018, the National Tariff Policy, 2016, and in turn, the Electricity Act, 2003.						
	vi) Therefore, the Objector prays that the Hon'ble TSERC may rationalize, revise, and approve the tariff schedule such that the tariff determined for each category does not exceed more than 20% of the actual cost of supply of a distribution licensee at the said voltage level, in strict accordance to the Hon'ble APTEL's Judgement dt.						

18.02.2022 in Appeal No. 248 of 2018, the National Tariff Policy, 2016, and in turn, the Electricity Act, 2003.

SUMMARY OF OBJECTOR'S ASSESSMENT OF ALLOWABLE ARR FOR FY 2023-24

i) The ARR as per Objector's assessment vs Petitioner's submission are provided below:

Summary of ARR for TSSPDCL for FY 2023-24

(All figures in Rs. Crores)

Particulars	Petitioner's Claim	Objector's Assessment	Disallowance
Transmission Cost	2,670.27	2,670.27	-
SLDC Cost	32.81	32.81	-
Distribution Cost	5,168.36	5,168.36	-
PGCIL & ULDC Expenses	1,081.98	1,081.98	-
Network and SLDC Cost (A)	8,953.42	8,953.42	-
Power Purchase / Procurement Cost	27,654.99	19,126.98	8,528.01
Interest on Consumer Security Deposits	311.96	311.96	-
Supply Margin in Retail Supply Business	42.83	42.83	-
Other Costs if any	-	-	-

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 submitted by Discoms, considering the justifications shared on the same.

Supply Cost (B)	28,009.78	19,481.76	8,528.01
Aggregate Revenue Requirement (A+B)	36,963.20	28,435.18	8,528.01
Non-Tariff Income	28.18	155.94	-127.76
Net Revenue Requirement	36,935.02	28,164.27	8,770.74
Sales (MU)	52,352.87	50,444.21	1,908.66
ACoS (Rs./kWh)	7.06	5.61	1.45
Total Revenue	33,724.37	32,394.69	
Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)	33,521.34	32,191.65	1,329.69
Revenue from Cross Subsidy Surcharge	100.80	100.80	-
Revenue from Additional Surcharge	102.23	102.23	-
Revenue Deficit(-)/Surplus(+) at Current Tariffs	-3,210.64	4,115.44	-7,326.09
Government Subsidy u/s 65 of the Electricity Act, 2003		6,018.47	-6,018.47
Net gap – Deficit(-)/Surplus(+)	-3,210.64	10,133.91	-13,344.56

Summary of ARR for TSNPDCL for FY 2023-24

(All figures in Rs. Crores)

Particulars	Petitioner's Claim	Objector's Assessment	Disallowance
Transmission Cost	1,126.29	1,126.29	-
SLDC Cost	13.69	13.69	-

Distribution Cost	4,081.42	4,081.42	-
PGCIL & ULDC Expenses	451.19	451.19	-
Network and SLDC Cost (A)	5,672.60	5,672.60	-
Power Purchase / Procurement Cost	11,310.21	6,801.75	4,508.47
Interest on Consumer Security Deposits	81.08	81.08	-
Supply Margin in Retail Supply Business	31.27	31.27	-
Other Costs if any	-	-	-
Supply Cost (B)	11,422.56	6,914.10	4,508.47
Aggregate Revenue Requirement (A+B)	17,095.16	12,586.69	4,508.47
Non-Tariff Income	33.81	137.96	-104.15
Net Revenue Requirement	17,061.35	12,448.74	4,612.61
Sales (MU)	21,265.36	19,345.26	1,920.10
ACoS (Rs./kWh)	8.02	6.44	1.59
Total Revenue	9,737.70	8,331.27	
Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)	9,737.70	8,331.27	1,406.43
Revenue from Cross Subsidy Surcharge	-	-	-
Revenue from Additional Surcharge	-	-	-

Revenue Deficit(-)/Surplus(+) at Current Tariffs	-7,323.65	-4,117.47	-3,206.18
Government Subsidy u/s 65 of the Electricity Act, 2003	-	5,367.15	-5,367.15
Net gap – Deficit(-)/Surplus(+)	-7,323.65	1,249.68	-8,573.33

Summary of ARR for Telangana State for FY 2023-24

(All figures in Rs. Crores)

Particulars	Petitioner's Claim	Objector's Assessment	Disallowance
Transmission Cost	3,796.56	3,796.56	-
SLDC Cost	46.50	46.50	-
Distribution Cost	9,249.78	9,249.78	-
PGCIL & ULDC Expenses	1,533.17	1,533.17	-
Network and SLDC Cost (A)	14,626.02	14,626.02	-
Power Purchase / Procurement Cost	38,965.20	25,928.72	13,036.48
Interest on Consumer Security Deposits	393.04	393.04	-
Supply Margin in Retail Supply Business	74.10	74.10	-
Other Costs if any	-	-	-
Supply Cost (B)	39,432.34	26,395.86	13,036.48
Aggregate Revenue Requirement (A+B)	54,058.35	41,021.88	13,036.48
Non-Tariff Income	61.99	293.90	-231.91

	Net Revenue Requirement	53,996.36	40,727.98	13,268.39	
	Sales (MU)	73,618.23	69,789.47	-	
	ACoS (Rs./kWh)	7.33	5.82	1.52	
	Total Revenue	43,462.07	40,725.95	-	
	Revenue at Existing Tariffs (without considering the Government subsidy u/s 65 of the Electricity Act, 2003)	43,259.04	40,522.92	2,736.12	
	Revenue from Cross Subsidy Surcharge	100.80	100.80	-	
	Revenue from Additional Surcharge	102.23	102.23	-	
	Revenue Deficit(-)/Surplus(+) at Current Tariffs	-10,534.29	-2.03	-10,532.27	
	Government Subsidy u/s 65 of the Electricity Act, 2003	-	11,385.62	-11,385.62	
	Net gap – Deficit(-)/Surplus(+)	-10,534.29	11,383.59	-21,917.88	
	ii) 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.				
	iii) It is prayed that the Hon'ble Commission may allow tariff reduction accordingly.				
	PROPOSED CROSS SUBSIDY SURCHARGE				
	i) The Objector prays that the Hon'ble Commission may rationalize the tariffs for industrial consumers and consequently, the cross subsidy surcharge in adherence to the mandate of the National Tariff Policy, 2016. The relevant extract of the National Tariff Policy, 2016 is reproduced below: <i>"8.3 Tariff design: Linkage of tariffs to cost of service</i>				Under the purview of Hon'ble TSERC. TS Discoms would abide by the directions of Hon'ble TSERC in this regards.

...

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

...

Surcharge formula:

...

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

(Emphasis supplied)

ii) Further, it is prayed that the Hon'ble Commission may not exceed the upper limit of allowable Cross-Subsidy Surcharge to Rs. 1.35/kWh and Rs. 1.54/kWh for TSSPDCL and TSNPDCL respectively for FY 2023-24 as computed by the Objector:

(All figures in Rs./kWh)

Discoms	ACoS as per Objector's Assessment	Maximum Tariff	Maximum CSS
	A	B = 1.2 x A	C = 0.2 x B
TSSPDCL	5.61	6.73	1.35
TSNPDCL	6.44	7.72	1.54

PARALLEL OPERATION CHARGES/ GRID SUPPORT CHARGES:

i) The Petitioners in their instant Petitions have again sought the introduction of Parallel Operation Charges/Grid Support Charges (GSC). The relevant extract of the Petition is reproduced below:

The detailed analysis and reasons for levy of Grid Support Charges by TS Discoms is already submitted to the Grid Co-Ordination Committee (GCC) and TS Discoms have

<p><i>“The licensee proposes 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: ...”</i></p>	<p>presented their views and analysis to all the stakeholders during the past GCC meetings with the stakeholders.</p> <p>TS Discoms mentioned that it is inevitable to levy the Grid Support Charges for the benefits availed by the generators during parallel operation with the grid and the gain to the Captive Power Plant is quite substantial in case there is grid support.</p>
<p>ii) It is submitted that the Petitioners had claimed Parallel Operation Charges/Grid Support Charges (GSC) in the previous year’s petitions as well. However, the Hon’ble Commission in its RST Order dt. 23.03.2022 had not allowed the same and had made the following directive:</p> <p><i>“Commission’s view 6.25.5 The stakeholders have vehemently opposed the DISCOMs proposal of GSC. The stakeholders have also raised certain issues purported to be incorrectness in the rationale provided by the DISCOMs. The stakeholders have also requested the Commission to undertake third party analysis before deciding on the levy of GSC as well as the quantum of such GSC. The Commission finds merit in the stakeholders’ suggestion to undertake a detailed study. 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.”</i></p> <p style="text-align: right;">(Emphasis supplied)</p>	<p>After due consultations with the stakeholders and study of methodologies in other states, TS Discoms modified the methodology for levy of Grid Support Charges and proposed the modified Grid Support Charges/ Parallel Operation Charges in the ARR & FPT petition for FY 2023-24.</p> <p>Hence, TS Discoms request Hon’ble Commission to consider the same and approve the levy of Grid Support Charges.</p>

	<p>iii) It is submitted that the Petitioners claim for Parallel Operation Charges/Grid Support Charges (GSC) in the instant petitions have not provided detailed study made by the Grid Coordination Committee. In the absence of the same, it is prayed that the Hon'ble Commission may disallow the claim of the Petitioners towards Parallel Operation Charges/Grid Support Charges (GSC).</p>	
	<p>PRAYERS: The Objector most respectfully prays that this Hon'ble Commission may be pleased to:</p> <ul style="list-style-type: none"> 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 purchase has been projected at exorbitantly high price not relatable to the incumbent market situations; C. Align the Non-Tariff incomes strictly in line with the Audited Accounts and reduce it from the ARR being approved; D. Adjust the subsidy shortfall from the Govt. of Telangana as per Objector's Assessment for FY2023-24; E. 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 2023-24; F. Approve the ARR by considering the total subsidy as prayed and assessed by the Objector in the detailed Objections Statement; 	<p>TS Discoms have responded to the item-wise objections/suggestions proposed by the objector, in the abovementioned sections, and would request the Hon'ble Commission to consider the projections shared by Discoms, considering the justifications shared on the same</p>

	<ul style="list-style-type: none">G. 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;H. Disallow the proposed revenue from proposed tariffs as claimed by the Petitioner;I. Allow Cross Subsidy Surcharge as per the mandates of the National Tariff Policy 2016;J. Disallow the claim of the Petitioners' towards Parallel Operation Charges/Grid Support Charges (GSC);K. Pass necessary orders as may be deemed appropriate in the facts and circumstances of the case in the interest of justice;L. 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.	
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Replies to the Objections/Suggestions raised on ARR & FPT including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 and Power Purchase true-up from FY 2016-17 to FY 2022-23 (Prov) for Retail Supply Business by Sri Lt. Gen. Dr. SP Kochhar, Director General, COAI, 2nd & 3rd Floor, 14 Bhai Veer Singh Marg, Gole Market, New Delhi- 110001.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	At the outset, we would like to introduce ourselves as COAI (Cellular Operators Association of India), a non-profit and non-governmental body with the vision to establish and sustain a world-class telecom infrastructure and facilitate affordable mobile communication services in India. The association's main objective, among others, is to assist the government in promoting the growth of Cellular Mobile Services in the country.	No Comments
2	Apropos the above references, wherein TSERC has asked for comments of stakeholders on electricity tariffs for FY 2023-24, we wish to thank you for giving us the opportunity to raise our request on electricity tariffs for the telecom industry. Presently, the telecom industry is being charged commercial rates as against industrial rates, resulting in undue financial burden on the telecom industry which works round the clock like any other industry.	<p>As per the definition stated in the Tariff Order 2022-23 for LT-Category III <i>“Industrial purpose shall mean, supply for purpose of manufacturing, processing and/or preserving goods for sale, cold storage/cold storage godowns but shall not include shops, business houses, offices, public buildings, hospitals, hotels, hostels, choultries, restaurants, clubs, theaters, cinemas, bus stations, railway stations and other similar premises, notwithstanding any manufacturing, processing or preserving goods for sale.”</i></p> <p>As there is no manufacturing, processing and preserving goods activity, Telecom towers are being categorised under LT-II-Non-Domestic/Commercial category.</p> <p>Further to the above it is to inform that LT-II Non Domestic/Commercial category is applicable for</p> <p>a) Consumers who undertake Non Domestic activity.</p> <p>b) Consumers who undertake Commercial activity.</p>

		<p>c) Consumers who do not fall in any other LT category i.e., LT – I, LT – III to LT –IX categories.</p> <p>d) Consumers who avail supply of energy for lighting, fans, heating, air conditioning and power appliances in Commercial or Non-Domestic premises such as shops, business houses, offices, public buildings, hospitals, hostels, choultries, restaurants, clubs, theatres, cinema halls, bus stands and attached offices, railway stations, timber depots, photo studios, printing presses, all servicing & repairing centres (other than that of TSERC), bus depots (other than that of TSERC), laundries, warehouses, godowns (other than cold storage godowns) etc.</p> <p>e) Educational institutions run by individuals, Non-Government Organizations or Private Trusts including student hostels of such educational institutions.</p> <p>It means LT-Cat II is not only applicable for commercial activity but also for the activities which are not covered in any other LT categories. As Cell towers business does not fall under any of LT –I,III,IV,V,VI&VII categories, it comes under LT-II category.</p>
3	<p>We submit that telecom is well recognized as a public utility service and growth engine for socio-economic development of the country. It is a well-established fact that telecom penetration has a multiplier effect on the nation’s GDP growth. Mobile connectivity brings multifarious benefits and is a critical factor in the growth and development of the nation. It is pertinent to note that services like, telephones (Mobile & Broadband services), hospitals, delivery of essential services including Emergency services (Police/Ambulance/Fire etc.) are essential and must be available 24x7 without interruption. Telecommunications has now become a National Priority. Widespread adoption of data services via telecom has enabled inclusion, empowerment and</p>	<p>No Comments</p>

	socio-economic progress of the Indian citizens, while also contributing substantially to the GDP of the country.	
4	Further, with the launch of 5G, we are at the cusp of embracing the next stage of digital revolution. Considering the strategic importance of 5G for the citizens, society and Industries, the Central Government has already taken various initiatives, such as issuance of Indian Telegraph Right of Way (Amendment) Rules, 2022 (dated 17th Aug 2022), to ease the deployment of 5G infrastructure across the country. Early deployment of 5G in the States will lead to multiple new sources of revenue generation for local bodies, State Governments, Start-ups, existing Businesses, and most importantly, benefits for the citizens. For this massive deployment of small cells (5G), there will be need for high number of EB connections across the state.	No Comments
5	High electricity tariffs are one of the biggest challenges faced by the rapidly growing telecom tower industry in India. It is estimated that almost 30 percent of the tower's OPEX accounted for are related to electricity tariffs, which is a significant amount.	It is to be noted that retail supply tariff is a sensitive issue and it involves consideration of multiple factors including consideration of ensuring financial viability of the sector. It is always a challenging task to the regulatory authorities to balance the interests of several stakeholders involved.
6	It is submitted that the Telecom Regulatory Authority of India (TRAI) in its report titled, "Recommendations on Use of Street Furniture for Small Cell and Aerial Fiber Deployment" dated 29.11.2022, after careful examination of the functioning of the telecom sector and after having considered the vital role being played by the telecommunication and broadband service sector in the economic growth of connected areas and the charges currently raised for providing electricity to telecom sites being very high, has also recommended that it is justified that telecom sites be provided electricity connection at industrial/utility tariffs. Copy of the report is attached (kindly refer to Chapter 3,	It is to be noted that the Recommendations provided by various bodies are not binding upon the utilities or the Electricity Regulatory Commissions which function on the principles of Electricity Act.

	Summary of Recommendations, E. Power related issues and solutions, 3.24, viii).	
7	<p>We like to bring to the notice of the Hon'ble Commission that as part of the additional Recommendations (clause iii) of the working group to the Forum of Indian Regulators (FOIR) on "Cross Sector Collaborative Regulation Between Telecom Regulators and Electricity Regulators" (Copy Enclosed) it is stated that</p> <p>"Telecom sites should be provided electricity connection under Utility /Industrial / tariff. SERCs may be requested to incorporate the same in their tariff orders."</p>	<p>Upon going through the detailed contents of the Report, TS Discoms observed that the quoted recommendation by objector was not one of the recommendations proposed by the working group to the FOIR but was one of the issues appraised to the Working Group which were ultimately not considered by the Working Group.</p> <p>The relevant extracts of the Report are as follows: <i>"The Working Group was also apprised of some issues that if addressed, can help in rapid infrastructure creation and faster rollout of 5G services. The same have been listed below for consideration of FOIR</i> ... <i>(iii) Telecom sites should be provided electricity connection under Utility/Industrial tariff. SERCs may be requested to incorporate the same in their tariff orders."</i></p> <p>In this regard, TS Discoms submit that Objectors shall not misrepresent the facts before the Hon'ble Commission and other stakeholders.</p>
8	<p>It may kindly be noted that the Government of Maharashtra, as part of their IT/ITES policy notified the applicability of industrial tariff to the telecommunication towers instead of commercial tariff. The Maharashtra State Electricity Regulatory Commission, after taking into consideration the IT/ITeS policy of the Government of Maharashtra, specifically categorized Telecommunication Towers in the Industry Tariff vide its order dated 30.03.2020 in Case No. 322 of 2019. In furtherance to the same, the Maharashtra State Electricity Distribution Company Ltd. vide Commercial Circular No. 323 dated 03.04.2020, revised</p>	<p>Categorization of activity may differ from one state to another state based on the policies of the state government and local conditions. This has been affirmed by Hon'ble Appellate Tribunal of Electricity in Appeal No. 265 of 2014</p> <p><i>"The State Commission may take reference from the orders passed by other State Regulatory Commissions while considering the categorization of various class of consumers for tariff applicability but it is not mandatory for compliance, however, the State Commissions have to comply with the principles set out in Sec 62 (3) of the Electricity Act, 2003."</i></p>

	the electricity tariff for telecommunication towers by placing them in the Industrial Category. Kindly find attached copy of the said circular, please refer under section LT V: LT-Industry, pages 26, 27.	
9	In view of the above, we earnestly request that in the State EB Tariff Orders, Telecom Industry electricity tariff may kindly be placed under Industrial/Utility / Special rates rather than the commercial rates.	TS Discoms request the Hon'ble Commission to kindly retain the existing category classification considering the above replies provided against the detailed objections.
10	We believe that enabling industrial rates for the telecom industry in Telangana will help propel telecom and data services in the progressive State, whereby crucial services such as m-governance, m-banking, m-health, m-education and the likes could be delivered, while facilitating the march towards the vision of achieving a Digital Telangana.	

Replies to the Objections/Suggestions raised on ARR & FPT including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 and Power Purchase true-up from FY 2016-17 to FY 2022-23 (Prov) for Retail Supply Business by Sri Praveen Kumar Malka, Reliance Jio Infocomm Limited, Circle Office, Lakeshore Towers, Rajbhavan Road, 4th Floor, Hyderabad-500062.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	<p>With reference to above mentioned letter of TSERC asking for comments of stakeholders on electricity tariffs for FY 2023-24, we wish to thank you for giving us opportunity to raise our request on electricity tariff on telecom industry.</p> <p>Prsently the telecom industry is being charged commercial rates as against industrial rates resulting in undue financial burden on telecom industry which works round the clock like any other industry.</p>	<p>As per the definition stated in the Tariff Order 2022-23 for LT-Category III "Industrial purpose shall mean, supply for purpose of manufacturing, processing and/or preserving goods for sale, cold storage/cold storage godowns but shall not include shops, business houses, offices, public buildings, hospitals, hotels, hostels, choultries, restaurants, clubs, theaters, cinemas, bus stations, railway stations and other similar premises, notwithstanding any manufacturing, processing or preserving goods for sale."</p> <p>As there is no manufacturing, processing and preserving goods activity, Telecom towers are being categorised under LT-II-Non-Domestic/Commercial category.</p> <p>Further to the above it is to inform that LT-II Non Domestic/Commercial category is applicable for</p> <p>a) Consumers who undertake Non Domestic activity.</p> <p>b) Consumers who undertake Commercial activity.</p> <p>c) Consumers who do not fall in any other LT category i.e., LT – I, LT – III to LT –IX categories.</p> <p>d) Consumers who avail supply of energy for lighting, fans, heating, air conditioning and power appliances in Commercial or Non-Domestic premises such as shops, business houses, offices, public buildings, hospitals, hostels, choultries,</p>

		<p>restaurants, clubs, theatres, cinema halls, bus stands and attached offices, railway stations, timber depots, photo studios, printing presses, all servicing & repairing centres (other than that of TSERC), bus depots (other than that of TSERC), laundries, warehouses, godowns (other than cold storage godowns) etc.</p> <p>e) Educational institutions run by individuals, Non-Government Organizations or Private Trusts including student hostels of such educational institutions.</p> <p>It means LT-Cat II is not only applicable for commercial activity but also for the activities which are not covered in any other LT categories. As Cell towers business does not fall under any of LT -I,III,IV,V,VI&VII categories, it comes under LT-II category.</p>
2.	The telecom sector as the backbone of digital infrastructure of the nation, is set to be the force-multiplier for many other sectors as well. In present times, Telecom is effectively an essential service similar to access for water and electricity. It is a key driver of economic and social development in an increasingly knowledge intensive global scenario.	No comments.
3.	We wish to bring to your kind notice that the Government of Telangana State vide its IT Policy 1. Telangana ICT Policy Framework 2016, 2. Telangana DATA Centres Policy 2016 (copy enclosed), has allowed the IT companies operating in Telangana State to pay industrial tariff for their power consumption. 24x7 Telecom Connectivity is essential and a prerequisite for seamless IT operations. There fore telecom network is also an integral part of IT eco-system. In fact, Telecom Connectivity is essential not only for IT operations but also for almost all important infrastructure to enable various services such as Digital Payments, Industry 4.0 (connected Industries), Remote Education and other infrastructure such as Power Sector which harness the benefits of	Telecom towers are being categorised under LT-II-Non-Domestic/Commercial category by the TS Discoms as per the terms and conditions specified in RST Order for FY 2022-23.

	Machine to Machine (M2M) connectivity.	
4.	Further, with the launch of 5G, we are at the cusp of embracing another round of digital revolution. 5G technology is well poised to bring in revolutionary changes in the areas of health, agriculture, road safety, gaming, logistics, manufacturing, education, drones, smart cities, smart homes etc. Availability of 5G networks would necessarily require network densification through low distance small cells. There will be a need for EB connections around the state for this massive deployment of 5G small cells.	No comments.
5.	Currently there are more than 7 lakh towers deployed in India. The National Broadband Mission (NBM) has targets of 12 lakh mobile towers by the end of 2023 & 15 lakh by the end of 2024. In order to achieve the NBM target of 50 lakh km of fiberization, 70% of tower being fiberized, and 50 megabits per second broadband speed, enhanced fiberization is a must.	
6.	High electricity tariffs are one of the biggest challenges faced by the rapidly growing telecom tower industry in India. It is estimated that almost 30 percent of the tower's OPEX is accounted for the towers are related to electricity tariffs, a significant portion.	It is to be noted that retail supply tariff is a sensitive issue and it involves consideration of multiple factors including consideration of ensuring financial viability of the sector. It is always a challenging task to the regulatory authorities to balance the interests of several stakeholders involved.
7.	There is a strong need of cross-sector collaboration between the power sector and telecom sector, which will not only reduce the cost for telecom companies but Discoms will also get a new revenue stream.	TS Discoms request the Hon'ble Commission to kindly retain the existing category classification considering the above replies provided against the detailed objections.
8.	In view of the above, we humbly request that in the State EB Tariff Orders, Telecom Industry electricity tariff may kindly be placed under Industrial rates rather than the commercial rates to bring the tariff on par with the IT services and other industries.	

Replies to the Objections/Suggestions raised on ARR & FPT including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 and Power Purchase true-up from FY 2016-17 to FY 2022-23 (Prov) for Retail Supply Business by M/s Summit Digital Infrastructure Limited, Lakeshore Tower, 4th Floor, Somajiguda, Rajbhvan Road, Hyderabad-500082.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	<p>With reference to above mentioned letter of TSERC asking for comments of stakeholders on electricity tariffs for FY 2023-24, we wish to thank you for giving us opportunity to raise our request on electricity tariff on telecom industry.</p> <p>Prsently the telecom industry is being charged commercial rates as against industrial rates resulting in undue financial burden on telecom industry which works round the clock like any other industry.</p>	<p>As per the definition stated in the Tariff Order 2022-23 for LT-Category III "Industrial purpose shall mean, supply for purpose of manufacturing, processing and/or preserving goods for sale, cold storage/cold storage godowns but shall not include shops, business houses, offices, public buildings, hospitals, hotels, hostels, choultries, restaurants, clubs, theaters, cinemas, bus stations, railway stations and other similar premises, notwithstanding any manufacturing, processing or preserving goods for sale."</p> <p>As there is no manufacturing, processing and preserving goods activity, Telecom towers are being categorised under LT-II-Non-Domestic/Commercial category.</p> <p>Further to the above it is to inform that LT-II Non Domestic/Commercial category is applicable for</p> <p>a) Consumers who undertake Non Domestic activity.</p> <p>b) Consumers who undertake Commercial activity.</p> <p>c) Consumers who do not fall in any other LT category i.e., LT – I, LT – III to LT –IX categories.</p> <p>d) Consumers who avail supply of energy for lighting, fans, heating, air conditioning and power appliances in Commercial or Non-Domestic premises such as shops, business houses, offices, public buildings, hospitals, hostels, choultries,</p>

		<p>restaurants, clubs, theatres, cinema halls, bus stands and attached offices, railway stations, timber depots, photo studios, printing presses, all servicing & repairing centres (other than that of TSERC), bus depots (other than that of TSERC), laundries, warehouses, godowns (other than cold storage godowns) etc.</p> <p>e) Educational institutions run by individuals, Non-Government Organizations or Private Trusts including student hostels of such educational institutions.</p> <p>It means LT-Cat II is not only applicable for commercial activity but also for the activities which are not covered in any other LT categories. As Cell towers business does not fall under any of LT -I,III,IV,V,VI&VII categories, it comes under LT-II category.</p>
2.	The telecom sector as the backbone of digital infrastructure of the nation, is set to be the force-multiplier for many other sectors as well. In present times, Telecom is effectively an essential service similar to access for water and electricity. It is a key driver of economic and social development in an increasingly knowledge intensive global scenario.	No comments.
3.	We wish to bring to your kind notice that the Government of Telangana State vide its IT Policy 1. Telangana ICT Policy Framework 2016, 2. Telangana DATA Centres Policy 2016 (copy enclosed), has allowed the IT companies operating in Telangana State to pay industrial tariff for their power consumption. 24x7 Telecom Connectivity is essential and a prerequisite for seamless IT operations. There fore telecom network is also an integral part of IT eco-system. In fact, Telecom Connectivity is essential not only for IT operations but also for almost all important infrastructure to enable various services such as Digital Payments, Industry 4.0 (connected Industries), Remote Education and other infrastructure such as Power Sector which harness the benefits of	Telecom towers are being categorised under LT-II-Non-Domestic/Commercial category by the TS Discoms as per the terms and conditions specified in RST Order for FY 2022-23.

	Machine to Machine (M2M) connectivity.	
4.	Further, with the launch of 5G, we are at the cusp of embracing another round of digital revolution. 5G technology is well poised to bring in revolutionary changes in the areas of health, agriculture, road safety, gaming, logistics, manufacturing, education, drones, smart cities, smart homes etc. Availability of 5G networks would necessarily require network densification through low distance small cells. There will be a need for EB connections around the state for this massive deployment of 5G small cells.	No comments.
5.	Currently there are more than 7 lakh towers deployed in India. The National Broadband Mission (NBM) has targets of 12 lakh mobile towers by the end of 2023 & 15 lakh by the end of 2024. In order to achieve the NBM target of 50 lakh km of fiberization, 70% of tower being fiberized, and 50 megabits per second broadband speed, enhanced fiberization is a must.	
6.	High electricity tariffs are one of the biggest challenges faced by the rapidly growing telecom tower industry in India. It is estimated that almost 30 percent of the tower's OPEX is accounted for the towers are related to electricity tariffs, a significant portion.	It is to be noted that retail supply tariff is a sensitive issue and it involves consideration of multiple factors including consideration of ensuring financial viability of the sector. It is always a challenging task to the regulatory authorities to balance the interests of several stakeholders involved.
7.	There is a strong need of cross-sector collaboration between the power sector and telecom sector, which will not only reduce the cost for telecom companies but Discoms will also get a new revenue stream.	TS Discoms request the Hon'ble Commission to kindly retain the existing category classification considering the above replies provided against the detailed objections.
8.	In view of the above, we humbly request that in the State EB Tariff Orders, Telecom Industry electricity tariff may kindly be placed under Industrial rates rather than the commercial rates to bring the tariff on par with the IT services and other industries.	

2023-24 ఆర్థికసంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత,ధరల ప్రతిపాదనలు, క్రాస్సబ్సిడీ సర్పార్జీ ప్రతిపాదనలు మరియు ట్రా-అప్ చార్జీలపై పై పైళ్ల ఆశయ్య, రాష్ట్ర ప్రధాన కార్యదర్శి తెలంగాణ రజక వృత్తిదారుల సంఘం గారిసూచనలు/సలహాలకు సమాదానాలు

క్రమ సంఖ్య	అభ్యంతరాలు /సూచనలు	TSNPDCL – సమాదానాలు
1	<p>తెలంగాణరాష్ట్రంలో రజక, నాయీబ్రాహ్మణ వృత్తిదారులకు ప్రభుత్వం ఉచితవిద్యుత్ 250 యూనిట్ల పథకాన్ని ప్రవేశపెట్టిన విషయం తమరికి తెలిసిందే. దోబీఘాట్లు, మరమగ్గాలు కుండల తయారీ, బంగారం, కమ్మరి, చెప్పులు కుట్టుట తదితర కులవృత్తులను ఎల్.టి-4 కేటగిరీలో చేర్చారు. కానీ లాండ్లీ, సెలూన్ వృత్తులను కమర్షియల్ కేటగిరీ ఎల్.టి-2 లో పెట్టటం వల్ల వృత్తిదారులకు తీవ్రమైన ఆర్థికభారం పడుతూ ప్రభుత్వం ప్రకటించిన పథకంవల్ల ప్రయోజనం లేకుండాపోయింది.</p> <p>రాష్ట్రంలో ఉన్న 73,097 ఇస్త్రీ షాపులు 34,651 సెలూన్ షాపులు ఏర్పాటు చేసుకొని ఈస్కీము కొరకు దరఖాస్తులు పెట్టుకున్నారు ప్రభుత్వం ఈస్కీమును ప్రకటించి సంవత్సరం కావస్తున్నా నేటికీ అమలు కాకపోగా, కమర్షియల్ కేటగిరీ -2వ వలన యూనిట్ కు రూ.12/-లు కట్టాల్సి వస్తుందని వృత్తిదారులు ఆవేదన చెందుతున్నారు. ఇదికాకుండా, ఆన్యవల్ కంజంప్షన్ డిపాజిట్ (ఎసిడి) ఛార్జీలు మరియు ఇతర ఛార్జీల రాలు కూడాపడు తున్నాయి.</p> <p>కావున రజకుల లాండ్లీలు, నాయీబ్రాహ్మణుల సెలూన్ల వృత్తులను కూడా కుటీర పరిశ్రమగా గుర్తించి ఎల్.టి-2 నుండి ఎల్.టి-4 కు మార్పు చేసి, సేవావృత్తుల వారికి ప్రభుత్వం ప్రకటించిన 250 యూనిట్ల ఉచితవిద్యుత్ పథకాన్ని అమలుపర్చాలని కోరుతున్నాము.</p>	<p>గౌరవనీయులైన TSERC జారీ చేసిన టారిఫ్ ఆర్డర్ FY 2022-23 ప్రకారం కటింగ్ సెలూన్లు, లాండ్లీలు మరియు దోబీ ఘాట్లకు ఇదివరకే 250 యూనిట్ల వరకు ఉచితవిద్యుత్ పథకాన్ని అమలు చేయడం జరిగింది మరియు ఆచరణలో ఉన్నది, కానీ కుటీర పరిశ్రమలు అయినటువంటి మరమగ్గాలు కుండల తయారీ, బంగారం, కమ్మరి, చెప్పులు కుట్టుట వంటి విభాగాలకు మాత్రము ఉచిత విద్యుత్ కాకుండా LT-IVA క్రింద ఫిక్స్ ఛార్జీలు 20/- నెలకు మరియు ఎనర్జీ ఛార్జీలు 4/- గా ధరలు నిర్ణయించ బడ్డాయి</p> <p>రాష్ట్ర ప్రభుత్వం రజక సోదరులకు మరియు సెలూన్ షాపులకు నెలకు 250 యూనిట్ల వరకు ఉచిత విద్యుత్ సౌకర్యం కల్పిస్తున్నారు ఈ ప్రయోజనం పొందాలనుకునేవారు OBMS పోర్టల్ లో నమోదు చేసుకోవాలి. ప్రస్తుతం TSNPDCL పరిధిలో 25,015 రజక సోదరులకు (ఇస్త్రీ షాప్స్), 12,512 సెలూన్ షాప్స్ ఈ పథకం క్రింద ప్రయోజనం పొందుతున్నారు.</p>

Replies to the Objections/Suggestions raised on ARR & FPT including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 and Power Purchase true-up from FY 2016-17 to FY 2022-23 (Prov) for Retail Supply Business by Sri Tilak Raju Dua, Director General, Digital Infrastructure Providers Association (DIPA), 2nd & 3rd Floor, 7 Bhai Veer Singh Marg, Gole Market, New Delhi- 110001.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	DIPA (Digital Infrastructure Providers Association) is an apex representative body of telecom infrastructure providers (IPs-1) in India dedicated to accelerating the success of Indian telecom evolution & represent the interest of >7 lac telecom towers Pan-India, serving ~1.2 Bn mobile subscribers across the country	No Comments
2	Apropos the above references, wherein TSERC has asked for comments of stakeholders on electricity tariffs for FY 2023-24, we wish to thank you for giving us the opportunity to raise our request on electricity tariffs for the telecom industry. Presently, the telecom industry is being charged commercial rates as against industrial rates, resulting in undue financial burden on the telecom industry which works round the clock like any other industry.	<p>As per the definition stated in the Tariff Order 2022-23 for LT-Category III <i>“Industrial purpose shall mean, supply for purpose of manufacturing, processing and/or preserving goods for sale, cold storage/cold storage godowns but shall not include shops, business houses, offices, public buildings, hospitals, hotels, hostels, choultries, restaurants, clubs, theaters, cinemas, bus stations, railway stations and other similar premises, notwithstanding any manufacturing, processing or preserving goods for sale.”</i></p> <p>As there is no manufacturing, processing and preserving goods activity, Telecom towers are being categorised under LT-II-Non-Domestic/Commercial category.</p> <p>Further to the above it is to inform that LT-II Non Domestic/Commercial category is applicable for</p> <p>a) Consumers who undertake Non Domestic activity.</p> <p>b) Consumers who undertake Commercial activity.</p>

		<p>c) Consumers who do not fall in any other LT category i.e., LT – I, LT – III to LT –IX categories.</p> <p>d) Consumers who avail supply of energy for lighting, fans, heating, air conditioning and power appliances in Commercial or Non-Domestic premises such as shops, business houses, offices, public buildings, hospitals, hostels, choultries, restaurants, clubs, theatres, cinema halls, bus stands and attached offices, railway stations, timber depots, photo studios, printing presses, all servicing & repairing centres (other than that of TSERC), bus depots (other than that of TSERC), laundries, warehouses, godowns (other than cold storage godowns) etc.</p> <p>e) Educational institutions run by individuals, Non-Government Organizations or Private Trusts including student hostels of such educational institutions.</p> <p>It means LT-Cat II is not only applicable for commercial activity but also for the activities which are not covered in any other LT categories. As Cell towers business does not fall under any of LT –I,III,IV,V,VI&VII categories, it comes under LT-II category.</p>
3	<p>As you are aware, Telecommunications is vital to the development of India and played a crucial role in the country's GDP during the COVID-19 lockdown, accounting for about 35% of GDP and directly contributing about 6%. As the nation moves towards 5G deployment, it will require the densification of networks, including the deployment of several-distance distance small cells, and enhanced fiberization to support 5G services and meet National Broadband Mission targets. This will require significant capital expenditure, increasing the cost of telecom infrastructure.</p>	<p>No Comments</p>

4	To ensure uninterrupted service, telecom operators are required by their license to maintain a network availability of over 99.5% of the time. Reliable, affordable power around the clock at all urban, semi-urban, and rural locations is therefore necessary to power telecom installations. The Indian government has recognized the importance of telecom infrastructure and has given it infrastructure status. Additionally, telecom towers are included on the "Updated Harmonized Master List of Infrastructure Sub-Sectors" in the Gazette of India dated October 7, 2013.	No Comments
5	High electricity tariffs are one of the biggest challenges faced by the rapidly growing telecom tower industry in India. It is estimated that almost 30 percent of the tower's OPEX accounted for are related to electricity tariffs, which is a significant amount.	It is to be noted that retail supply tariff is a sensitive issue and it involves consideration of multiple factors including consideration of ensuring financial viability of the sector. It is always a challenging task to the regulatory authorities to balance the interests of several stakeholders involved.
6	The Electricity (Rights of Consumers) Rules, 2020 and the 2022 amendment from the Ministry of Power, as well as the Recommendations of the Working Group to the FOIR on "Cross-Sector Collaborative Regulation between Telecom Regulators and Electricity Regulators," outline that agencies and distribution companies should provide timely electricity connections with smart meters and industrial/utility category tariffs to the telecom industry.	<p>TS Discoms submit that electricity connections are being provided to the consumers timely without any delay.</p> <p>As regards to the Recommendation of Working Group to FOIR, TS Discoms observed that the quoted recommendation by objector was not one of the recommendations proposed by the working group to the FOIR but was one of the issues appraised to the Working Group which were ultimately not considered by the Working Group.</p> <p>The relevant extracts of the Report are as follows: <i>"The Working Group was also apprised of some issues that if addressed, can help in rapid infrastructure creation and faster rollout of 5G services. The same have been listed below for consideration of FOIR</i> ... </p>

		<p><i>(iii) Telecom sites should be provided electricity connection under Utility/industrial tariff. SERCs may be requested to incorporate the same in their tariff orders."</i></p> <p>In this regard, TS Discoms submit that Objectors shall not misrepresent the facts before the Hon'ble Commission and other stakeholders.</p>
7	<p>The Telecom Regulatory Authority of India has acknowledged the important role that telecom and broadband services play in the economic development of connected regions and has suggested in a report that telecom sites should be given access to electricity at industrial or utility tariffs. The report, titled "Recommendations on Use of Street Furniture for Small Cell and Aerial Fiber Deployment" and dated November 29, 2022, cites the current high charges for providing electricity to telecom sites as justification for this recommendation.</p>	<p>It is to be noted that the Recommendations provided by various bodies are not binding upon the utilities or the Electricity Regulatory Commissions which function on the principles of Electricity Act.</p>
8	<p>We would like to inform the Honorable Commission that the working group's additional Recommendations on "Cross Sector Collaborative Regulation Between Telecom Regulators and Electricity Regulators" (enclosed) recommend that telecom sites should be provided with electricity connections under the Utility/Industrial tariff. The State Electricity Regulatory Commissions (SERCs) may be asked to include this in their tariff orders</p>	<p>As regards to the Recommendation of Working Group to FOIR, TS Discoms observed that the quoted recommendation by objector was not one of the recommendations proposed by the working group to the FOIR but was one of the issues appraised to the Working Group which were ultimately not considered by the Working Group.</p> <p>The relevant extracts of the Report are as follows: <i>"The Working Group was also apprised of some issues that if addressed, can help in rapid infrastructure creation and faster rollout of 5G services. The same have been listed below for consideration of FOIR</i> ... </p>

		<p><i>(iii) Telecom sites should be provided electricity connection under Utility/industrial tariff. SERCs may be requested to incorporate the same in their tariff orders."</i></p> <p>In this regard, TS Discoms submit that Objectors shall not misrepresent the facts before the Hon'ble Commission and other stakeholders.</p>
9	<p>Further, It may be kindly noted that the Government of Maharashtra, as part of their IT/ITES policy notified the applicability of industrial tariff to the telecommunication towers instead of commercial tariff. It is submitted that the Maharashtra State Electricity Regulatory Commission (MSERC) after taking into consideration the IT/ITeS policy of the Government of Maharashtra specifically categorized Telecommunication Towers in the Industry Tariff vide its order dated 30.03.2020 in Case No. 322 of 2019. In furtherance to the same the Maharashtra State Electricity Distribution Company Ltd. vide Commercial Circular No. 323 dated 03.04.2020 has revised the electricity tariff for telecommunication towers by placing them in the Industrial Category.</p>	<p>Categorization of activity may differ from one state to another state based on the policies of the state government and local conditions. This has been affirmed by Hon'ble Appellate Tribunal of Electricity in Appeal No. 265 of 2014</p> <p><i>"The State Commission may take reference from the orders passed by other State Regulatory Commissions while considering the categorization of various class of consumers for tariff applicability but it is not mandatory for compliance, however, the State Commissions have to comply with the principles set out in Sec 62 (3) of the Electricity Act, 2003."</i></p>
10	<p>In view of the above, we earnestly request that in the State EB Tariff Orders, Telecom Industry electricity tariff may kindly be placed under Industrial/Utility / Special rates rather than the commercial rates.</p>	<p>TS Discoms request the Hon'ble Commission to kindly retain the existing category classification considering the above replies provided against the detailed objections</p>

11	We believe that enabling industrial rates for the telecom industry in Telangana will help propel telecom and data services in the progressive State, whereby crucial services such as m-governance, m-banking, m-health, m-education and the likes could be delivered, while facilitating the march towards the vision of achieving a Digital Telangana.	
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2023-24 ఆర్థికసంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరలప్రతిపాదనలు, క్రాస్సబ్సిడీ సర్చార్జీ ప్రతిపాదనలు మరియు ట్రా అప్ చార్జీల పై బొట్టు శ్రీధర్, తండ్రిపేరు : సోమనాథం, గ్రామం: శాతాపురం, మండలం: పాలకుర్తి, జిల్లా: జనగాం -506302 గారిసూచనలు/సలహాలకు సమాదానాలు

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TSNPDCL – సమాదానాలు
3	<p>జన ఆవాసాల మధ్య ప్రమాదకరంగా ఉన్న ట్రాన్స్ ఫార్మర్ ను తొలగించుట గూర్చి ఆర్డీ.</p> <p>మేము శాతాపురం గ్రామ ప్రజలం తమరితో మనవి చేయునది ఏమనగా గత 20సం.ల నుండి ప్రజలు నివసించే ఇళ్లు మధ్యన ట్రాన్స్ ఫార్మర్ ప్రమాదకరంగా ఉన్నది [పల్ల మార్లు] సందర్భాలలో మేకలు, పశువులు, విద్యుత్ ఘాతం జరిగింది. అదేవిధంగా ఇంటి పైకప్పు నుండి " వైర్" వెళ్ళడం ద్వారా ఆ వైర్ల క్రింద ఉన్న ఇంటిలోని వస్తు వులు అలాగే వ్యక్తులకు షాక్ గురి అవడం జరిగింది. అలాగే ఆ ట్రాన్స్ ఫార్మర్ దళితవాడ లో ఉన్నది. వారు కమ్యూనిటీ హాల్ నిర్మాణం కోసం అ స్థలంను నిర్మాణం కోసం వినియోగం తేవాలని వారు పలుమార్లు, మంత్రి ఎర్రబెల్లి దయాకర్ గారికి మరియు DE, ADE, SE గార్లకు. విన్నవించు కోవడం జరిగింది కాని ఇప్పటి వాటి తొలగించలేదు, మా ఊ గ్రామపంచాయితీ లో లోటు బడ్జెట్ ఉండటం ద్వారా భారతీయ కిసాన్</p>	<p>i). SS-1/100KVA DTR పిప్టింగ్ ఎస్టిమేషన్ WBS నెం.: D-2201-08-02-02-02-003 ద్వారా మంజూరు చేయబడింది మరియు గ్రామ పంచాయతీ సర్పంచ్ కు డిమాండ్ నోటీసు జారీ చేయడం జరిగినది.</p> <p>ii). గ్రామ పంచాయతీ నుంచి నేటికీ సంబంధిత చెల్లింపులు జరగలేదు.</p> <p>iii). SS-1/100KVA DTR డబుల్ స్ట్రక్చర్లో ఉంది మరియు గ్రౌండ్ క్లియరెన్స్ 6 అడుగుల కంటే ఎక్కువ మరియు సరైన క్లియరెన్స్ ఉంది.</p> <p>iv). ఇంకా మీకు సమర్పిస్తుంది ఏమిటంటే ఈ DTR వద్ద ఇంతకు ముందు ఎలాంటి విద్యుత్ ప్రమాదాలు జరగలేదు.</p>

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TSNPDCL – సమాదానాలు
	సంఘ్ నుండి పలుమార్లు హాన్మకొండ ERC, మరియు జనగా ERC మీటింగ్ లో విన్నవించుకోవడం జరిగింది ఇప్పటికి ఎలాంటి స్పందన రాలేదు.	

2023-24 ఆర్థికసంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరలప్రతిపాదనలు, క్రాస్సబ్సిడీసర్పార్టీ ప్రతిపాదనలు మరియు ట్రా అప్ చార్జీల పై ఇటికాల సోమాజీ, తండ్రిపేరు : బక్కయ్య, గ్రామం: శాతాపురం, మండలం: పాలకుర్తి, జిల్లా: జనగాం -506302 గారిసూచనలు/సలహాలకు సమాదానాలు

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TSNPDCL – సమాదానాలు																		
4	<p>వ్యవసాయ విద్యుత్ మరియు వైర్లు అమర్చుట గూర్చి. మా మనవి ఏమనగా మేం పాలకుర్తి మండలం శాతాపురం గ్రామా ప్రజల రైతులం. మా వ్యవసాయ విద్యుత్ కనెక్షన్ గురించి D.Dలు చెల్లించియున్నాం. సాంక్షన్ అయి సర్వీస్ నంబర్ కూడా కేటాయించి రు. అప్పటి నుండి మేం కర్రల పై సర్వీసు వైర్ నడిపించుకుంటున్నాం, ఇది పశువులకు, మనుషులకు ప్రమాదకరంగా ఉన్నది. ఈ విషయం పై 03-06-2022 జనగాం లో జరిగిన E.R.C చైర్మన్ గారి దృష్టికి తీసుకుపోదం అను జనగాం లో జరిగిన ERC మీటింగ్ వచ్చినాం కాని AD గారు వరుస క్రమంలో అమర్చుతాము అనగా ఆగినం. ఇప్పటికీ ఎలాంటి స్పందన లేదు. కావున ఇప్పటికైనా మా యందు దయ తలచి వైర్లు అమర్చి మమ్మల్ని ప్రమాదాల నుండి రక్షించవలసిందిగా కోరుతున్నాం</p>	<p>పాలకుర్తి రూరల్ లోని శాతాపూర్ మరియు తొర్రూర్ డిస్ట్రిబ్యూషన్ లో ఇప్పటికే వ్యవసాయ సర్వీసుల కోసం స్తంభాల ఏర్పాటు మరియు లైన్ స్ట్రీంగ్ కు సంబంధించి దరఖాస్తు స్వీకరించబడింది.</p> <p>సమర్పణ-3:</p> <table border="1"> <tr> <td>S.C నెం</td> <td>వినియోగదారు పేరు</td> <td>విడుదల తేదీ</td> </tr> <tr> <td>14121-00177</td> <td>ఏటికల బక్కయ్య</td> <td>31.12.1998</td> </tr> <tr> <td>14121-00445</td> <td>ఏటికల బక్కయ్య</td> <td>04.05.2019</td> </tr> <tr> <td>14121-00254</td> <td>ఏటికల నర్సింగం</td> <td>12.09.2006</td> </tr> <tr> <td>14110-00403</td> <td>బంతోజు రామస్వామి</td> <td>15.03.1997</td> </tr> <tr> <td>14110-00617</td> <td>సోమనర్సయ్య</td> <td>25.07.2008</td> </tr> </table> <p>పై సర్వీసులు చాలా కాలం క్రితం విడుదల చేయబడ్డాయి ప్రస్తుతం ఉన్న</p>	S.C నెం	వినియోగదారు పేరు	విడుదల తేదీ	14121-00177	ఏటికల బక్కయ్య	31.12.1998	14121-00445	ఏటికల బక్కయ్య	04.05.2019	14121-00254	ఏటికల నర్సింగం	12.09.2006	14110-00403	బంతోజు రామస్వామి	15.03.1997	14110-00617	సోమనర్సయ్య	25.07.2008
S.C నెం	వినియోగదారు పేరు	విడుదల తేదీ																		
14121-00177	ఏటికల బక్కయ్య	31.12.1998																		
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క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TSNPDCL – సమాదానాలు
		<p>లెన్టీ సర్వీసులకు స్తంభాలను అందించే పథకం లేదు. ఎస్టిమేట్ వేసి స్థంబాలు నిర్మించడానికి వినియోగదారుడు డబ్బులు చెల్లిస్తానని సమ్మతి పత్రము ఇవ్వవలెను.</p>

2023-24 ఆర్థికసంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరలప్రతిపాదనలు, క్రాస్సబ్సిడీసర్చార్జీ ప్రతిపాదనలు మరియు ట్రా అప్ చార్జీల పై భూమండల భాస్కర్ , తండ్రిపేరు : సోమ నర్సయ్య, గ్రామం: ముత్తారం, మండలం: పాలకుర్తి, జిల్లా: జనగాం గారిసూచనలు/సలహాలకు సమాదానాలు

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TSNPDCL - సమాదానాలు
1	<p>మేము భూమండల స్కర్ S/o. సోమనర్సయ్య గ్రా, ముత్తారం మం, పాలకుర్తి , జనగామ, వారిమి మరియు బండి ప్రశాం బండి శ్రీకాంత్, కరై హరిష్, క రామచంద్రు, భూమాండల హేమల ము అందరం కలిసి మీకు మనవి చేయునది ఏమనగా మా వ్యవసాయ బోరు, బావుల వద్ద విద్యుత్ అంతరాయం గూర్చి పలుమార్లు విద్యుత్ అధికారులకు సమస్యలను చెప్పిన కూడా ఇంత వరకు పరిష్కారం చూపలేదు. పైగా కొత్త D.D. లను 6 రైతులు మరో మారు మీసేవలో application చేయడం జరిగింది. కావున అంచన వ్యయంను మాకు పంట పొలం కు విద్యుత్ ను నిరంతరం సరఫరాకు కృషిచేయగలరని మాయొక్క మనవి.</p>	<p>i). ప్రస్తుతం ఉన్న ముత్తారం SS-03/100KVA DTR, 18 బోర్ లతో నడుస్తోంది మరియు DTR అండర్ లోడ్లో ఉంది.</p> <p>ii). 6 గురు వినియోగదారులు కొత్త AGL సర్వీసు కనక్షన్ కోసము DDలు చెల్లించారు WBS నంబర్: A-2201-08-02-02-01-009 ద్వారా ఎస్టిమేషన్ 2,12,814 రూపాయల ORC మంజూరు చేయబడింది.</p> <p>iii). ORC డబ్బులు చెల్లించగానే పని పూర్తి చేస్తాము</p>

2023-24 ఆర్థికసంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరలప్రతిపాదనలు, క్రాస్సబ్సిడీసర్చార్జీ ప్రతిపాదనలు, మరియు ట్రా అప్ చార్జీల పై బొట్టు సోమనాథం, తండ్రిపేరు : ఎల్లయ్య, గ్రామం: శాతాపురం, మండలం: పాలకుర్తి, జిల్లా: జనగాం -506302 గారిసూచనలు/సలహాలకు సమాదానాలు

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TSNPDCL – సమాదానాలు
1	<p>శ్రీయుత గౌరవనీయులైన TSERC సెక్రటరీ గారికి నమస్కరిస్తూ వ్రాయునది ఏమనగా లూజు ఏర్పాటు చేయుట గూర్చి ఆ మేము బొట్టు సోమనాథం S/o. ఎల్లయ్య, గ్రా. శాతాపురం. మం. పాలకుర్తి జనగాం వారిమి తమరితో మనవి చేయునది ఏమనగా 1994 లో మాకు నిబంధనలకు విరుద్ధంగా 120 మీటర్లులకు 1 చొప్పున 12 స్థంభాలను నిర్మాణం చేపట్టినారు నాటి నుండి పలుమార్లు పశువులు చని సందర్భాలు ఎదురైనాయి కావున లూజు పై చెర్య తీసుకోగలరని నాయొక్క మనవి.</p>	<p>పై ప్రదేశాన్ని సంబంధిత ADE/ఆపరేషన్ & AE/ఆపరేషన్ తనిఖీ చేసారు మరియు 4 నంబర్ అవసరమని గమనించారు మరియు WBS నంబర్ T-2207-08-02-02-02-002 మధ్య స్థంభాలను అందించడానికి ఎస్టిమేషన్ మంజూరు చేయబడింది మరియు పని కూడా పూర్తయింది.</p>

Replies to the Objections/Suggestions raised on ARR & Tariff Proposals for Retail Supply Business including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 and True up Charges for FY 2016-17 to FY 2022-23(Prov) by Sri J.Mariyanna, B.Sc(Horti.), District Horticulture & Sericulture Officer, Bhadradri Kothagudem District.

S.No.	Summary of Objections / Suggestions				Response of the Licensee																				
1	<p>104 nurseries are producing fruit, vegetable and chilli nursery in private sector in Bhadradri Kothagudem District.</p> <p>Further, it is to submit that (8) Govt. nurseries are producing fruit plants and Oilpalm seedlings in the district and supplying to the farmers on subsidy basis.</p> <table border="1" data-bbox="233 695 1144 1352"> <thead> <tr> <th data-bbox="233 695 323 805">Sl. No.</th> <th data-bbox="323 695 613 805">Name of the Nursery</th> <th data-bbox="613 695 871 805">Location</th> <th data-bbox="871 695 1144 805">Remarks</th> </tr> </thead> <tbody> <tr> <td data-bbox="233 805 323 1000">1</td> <td data-bbox="323 805 613 1000">Horticulture Farm, Garimellapadu</td> <td data-bbox="613 805 871 1000">Chunchupalli, Kothagudem</td> <td data-bbox="871 805 1144 1000">Producing fruit plants and maintaining Oilpalm demo plot.</td> </tr> <tr> <td data-bbox="233 1000 323 1110">2</td> <td data-bbox="323 1000 613 1110">Govt. Seed Farm, Garimellapadu</td> <td data-bbox="613 1000 871 1110">Chunchupalli, Kothagudem</td> <td data-bbox="871 1000 1144 1110">Producing mulberry saplings.</td> </tr> <tr> <td data-bbox="233 1110 323 1221">3</td> <td data-bbox="323 1110 613 1221">HNTC Garimellapadu</td> <td data-bbox="613 1110 871 1221">Chunchupalli, Kothagudem</td> <td data-bbox="871 1110 1144 1221">Producing fruit and ornamental plants.</td> </tr> <tr> <td data-bbox="233 1221 323 1352">4</td> <td data-bbox="323 1221 613 1352">Horticulture Farm, Achyuthapuram</td> <td data-bbox="613 1221 871 1352">Aswaraopet</td> <td data-bbox="871 1221 1144 1352">Maintaining 30 Acres Oilpalm demo plot.</td> </tr> </tbody> </table>				Sl. No.	Name of the Nursery	Location	Remarks	1	Horticulture Farm, Garimellapadu	Chunchupalli, Kothagudem	Producing fruit plants and maintaining Oilpalm demo plot.	2	Govt. Seed Farm, Garimellapadu	Chunchupalli, Kothagudem	Producing mulberry saplings.	3	HNTC Garimellapadu	Chunchupalli, Kothagudem	Producing fruit and ornamental plants.	4	Horticulture Farm, Achyuthapuram	Aswaraopet	Maintaining 30 Acres Oilpalm demo plot.	<ol style="list-style-type: none"> As per the Tariff Order issued by the Hon'ble TSERC for FY2022-23, the Horticulture Nurseries up to 15HP connected load are categorized under LT-V(B): Agriculture Others with a tariff of Fixed charge – Rs.20 / KW / month and Energy charge – Rs. 4.00 / unit. Whereas the Cost of Service of the category LT-V is Rs.8.34 / unit and average Cost of Service for FY 2022-23 is Rs. 7.57 / unit. Hence, the existing category of Horticulture Nurseries is already a subsidized category. Free Power Supply is being extended to category LT-V(A): Agriculture (other than corporate farmers) as per the Government Policy and hence the total agriculture consumption is subsidized in the form of State Government Subsidy and also by getting cross subsidy from the other categories. The clause 8.3.2. of the National Tariff Policy, 2016 states that "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 ±20% of the average cost of supply".
Sl. No.	Name of the Nursery	Location	Remarks																						
1	Horticulture Farm, Garimellapadu	Chunchupalli, Kothagudem	Producing fruit plants and maintaining Oilpalm demo plot.																						
2	Govt. Seed Farm, Garimellapadu	Chunchupalli, Kothagudem	Producing mulberry saplings.																						
3	HNTC Garimellapadu	Chunchupalli, Kothagudem	Producing fruit and ornamental plants.																						
4	Horticulture Farm, Achyuthapuram	Aswaraopet	Maintaining 30 Acres Oilpalm demo plot.																						

5	Coconut Seed Garden, Aswaraopet	Aswaraopet	Producing Coconut plants.
6	Govt. Seed Farm, Akinepalli.	Aswaraopet	Producing mulberry saplings.
7	Govt. Seed Farm, Aswaraopet	Aswaraopet	Producing mulberry saplings.
8	TS Oilfed Nursery, Aswaraopet	Aswaraopet	Producing Oilpalm seedlings.

4. If the Horticulture Nurseries are to be treated in line with Agriculture category, the State Government has to bear the subsidy to such extent as per Section 65 of Electricity Act 2003.

The Collector & District Magistrate, Bhadradi Kothagudem District has requested the Principal Secretary Agri Co-op Department, Govt. of TSs, Hyderabad to consider the nurseries in Agriculture sector and give free power to the nurseries.

Hence, it is requested the Chairman, Telangana Electricity Regulatory Commission, Hyderabad to kindly provide free power supply to the above nurseries.

Replies to the Objections/Suggestions raised on ARR & FPT including Cross Subsidy Surcharge for Open Access Consumers for the FY 2023-24 and Power Purchase true-up from FY 2016-17 to FY 2022-23 (Prov) for Retail Supply Business by M/s Bharati Airtel Ltd, Sai Sanjay suraneni, # 56-4-25, 3rd Floor, Thaygarajan Complex, High School Road, Patamata, Vijayawada, Andhra Pradesh- 520010.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	The present objections, suggestions and submissions are being filed on behalf of Bharti Airtel Limited in reply to the Public Notice issued by Telangana Electricity Regulatory Commission dated 21.12.2022.	No Comments
2	That this Hon'ble Commission has issued the Public Notice dated 21.12.2022 (' Public Notice ') inviting objections/submissions on the Aggregate Revenue Requirement (" ARR ") & Tariff Proposals for Retail Supply Business for Financial Year 2023-24 proposed by Co-Operative Electricity Supply Limited, Sircilla in O.P. No. 79 of 2022, Northern Power Distribution Company in O.P. No. 80 of 2022 and Southern power Distribution Company of Telangana Limited in O.P. No. 81 of 2022 and submitted to this Hon'ble Commission for consideration.	No Comments
3	It is submitted that our company Bharti Airtel Ltd. (' Airtel ') is a global communications solutions provider with over 491 Mn customers in 17 countries across South Asia and Africa. Airtel is one of the largest players in the Indian Telecom Sector with diversified operations in Telecom Infrastructure, Equipment, Mobile Virtual Network Operators (MNVO), White Space Spectrum, 5G, Telephone Service Providers and Broadband. Airtel ranks amongst the top three mobile operators globally and its network covers over two billion people. Airtel is India's largest integrated communications solutions provider. Airtel's retail portfolio includes high speed 4G/4.5G mobile broadband, Airtel Xstream Fiber that promises speeds up to 1 Gbps with convergence across linear and on-demand entertainment, streaming services spanning music and video, digital payments and financial services. For enterprise customers, Airtel offers a gamut of solutions that includes secure connectivity, cloud and data center services, cyber security, IoT, Ad Tech and CPaaS (Airtel IQ)	No Comments

4	<p>It is submitted that the Government of India has granted infrastructure status to the telecom tower provided industry in the year 2012 to boost the development of telecom infrastructure in India. It is submitted that over the last seven years, the Indian Telecom Tower industry has grown significantly by 65%. The number of mobile towers increased from 400,000 in 2014 to 660,000 in 2021. Similarly, the number of Mobile Base Transceiver Stations have grown rapidly by 187% and increased from 800,000 in 2014 to 2.3 mn in 2021. Rural tele-density jumps from 44% in March 2014 to 58% in October 2022. The telecom sector continues to play a leading role in successful implementation of various Government programmes like Digital India, Make in India, and development of Smart Cities. These programs and initiatives present plethora of opportunities for the telecom sector especially for the telecom infrastructure providers as the telecommunication infrastructure is the bedrock for achieving the vision of Digital India.</p>	No Comments
5	<p>It is submitted that the Information Technology, Electronics and Communications (Promotions) Department, Government of Telangana published ICT Policy ('ICT Policy') addressing the current needs of the industry. The Goal of the ICT Policy 2021-2026 is to achieve digital empowerment of every citizen, meaning that every citizen is fully aware of digital opportunities for his needs, and has the wherewithal to access them. A copy of the ICT Policy is filed as Annexure No.1.</p>	No Comments
6	<p>In the said ICT Policy, the State of Telangana has identified eight Focus Sectors such as Life Sciences and Healthcare, BFSI, Computing Systems, Automotive/Mobility, Semiconductors, Energy, Aerospace & Defence, Retail and Telecom as sectors with great potential to grow and to adopt digital-based solutions at a rapid pace in the next 5 years.</p>	No Comments
7	<p>It is pertinent to submit that the Telecom Sector is a foundational pillar and acts as a backbone to the IT Industry. This is because fast internet and leased line connections provided by the Telecom Sector is foundational for smooth functioning and growth of the IT Industry. The ICT Policy as a measure for</p>	No Comments

	development of start-up ecosystem also highlights the importance of 5 G Cellular networks which is directly dependent on the telecommunication towers.	
8	ICT Policy acknowledges that Hyderabad is one of the first cities in India which has had pilots for 5G communication services done by their telecom partners. That, in future, the State will formulate adequate strategies to enable citizens in both rural and urban locations to use 5G technology. In order to achieve this, the ICT Policy states that “sufficient relaxations and the Right of Way orders will be provided to ease the entry of telecom service providers.”	No Comments
9	Further, the ICT Policy expressly states that the State will provide certain incentives in power, certification, subsidies etc to IT and ITeS Companies to support the IT industry. As stated above, since the Telecom Sector is included within the IT Industry, incentives in power, certification etc should also be provided to the telecom sector. Therefore, it is submitted that industrial tariff should be made applicable to the telecom sector.	TS Discoms submit that the matter of providing incentives/subsidies to any category of consumers is under the purview of the GoTS and as per Section 65 of Electricity Act, 2003 the State Government shall provide the subsidy in advance to the Discoms. It is submitted that the Electricity Regulatory Commission’s and Utilities function on the principles of Electricity Act, 2003.
10	It is submitted that our company and several others in the Telecom Sector are incurring huge capital expenditure and operational costs in establishing 5G Cellular network. High costs are being incurred by Airtel to cater to the demand of 5G Cellular networks not only to the IT Industry but also to retail customers in the State of Telangana. One of the main and significant costs is the electricity tariff charged to the telecom towers. Currently, the Telcom towers are charged under the LT II (B) Non-Domestic/Commercial category of tariff. Under the current tariff applicability, the operational costs of telecom towers works out to a substantial amount which makes it difficult for the telecom companies to sustain such infrastructure.	As per the definition stated in the Tariff Order 2022-23 for LT-Category III “ Industrial purpose shall mean, supply for purpose of manufacturing, processing and/or preserving goods for sale, cold storage/cold storage godowns but shall not include shops, business houses, offices, public buildings, hospitals, hotels, hostels, choultries, restaurants, clubs, theaters, cinemas, bus stations, railway stations and other similar premises, notwithstanding any manufacturing, processing or preserving goods for sale. ” As there is no manufacturing, processing and preserving goods activity, Telecom towers are being categorised under LT-II-Non-Domestic/Commercial category.

		<p>Further to the above it is to inform that LT-II Non Domestic/Commercial category is applicable for</p> <p>a) Consumers who undertake Non Domestic activity.</p> <p>b) Consumers who undertake Commercial activity.</p> <p>c) Consumers who do not fall in any other LT category i.e., LT – I, LT – III to LT –IX categories.</p> <p>d) Consumers who avail supply of energy for lighting, fans, heating, air conditioning and power appliances in Commercial or Non-Domestic premises such as shops, business houses, offices, public buildings, hospitals, hostels, choultries, restaurants, clubs, theatres, cinema halls, bus stands and attached offices, railway stations, timber depots, photo studios, printing presses, all servicing & repairing centres (other than that of TSERC), bus depots (other than that of TSERC), laundries, warehouses, godowns (other than cold storage godowns) etc.</p> <p>e) Educational institutions run by individuals, Non-Government Organizations or Private Trusts including student hostels of such educational institutions.</p> <p>It means LT-Cat II is not only applicable for commercial activity but also for the activities which are not covered in any other LT categories. As Cell towers business does not fall under any of LT –I,III,IV,V,VI&VII categories, it comes under LT-II category.</p>
11	It is submitted that the Telecom Regulatory Authority of India in its report titled, "Recommendations on Use of Street Furniture for Small Cell and Aerial Fiber	It is to be noted that the Recommendations provided by various bodies are not binding upon the utilities or the

	Deployment” dated 29.11.2022, after careful examination of the functioning of the telecom sector and after having considered the vital role being played by the telecommunication and broadband service sector in the economic growth of connected areas and the charges currently raised for providing electricity to telecom sites are very high, as such, has also recommended that it is justified that telecom sites should be provided electricity connection at industrial/utility tariffs. Copy of the report dated 29.11.2022 is filed as Annexure No. 2.	Electricity Regulatory Commissions which function on the principles of Electricity Act, 2003.
12	It is submitted that Airtel currently has 10000 telecom towers in the State of Telangana and Electricity consumption details for the year 2021-2022 are filed herewith as Annexure No.3.	No Comment
13	It is submitted that additionally, enhanced fiberization is a must for 5G services and to achieve the targets fixed by the National Broadband Mission (NBM) of 50 lakh km fiberization, 70 per cent tower fiberization and 50 megabits per second speed of broadband. This would entail heavy capital expenditure, thus, raising the cost of telecom services, leading to a greater digital divide. According to the industry estimates, almost 30 per cent of the operational expense for the telecom towers goes into electricity tariffs, which works out to be a substantial amount, thus, making it crucial for this Hon’ble Commission to categorise the telecom companies under the industrial category, thereby, lowering the burden on the telecom companies which would indirectly lead to facilitating affordability of telecom services to the end customer.	It is to be noted that retail supply tariff is a sensitive issue and it involves consideration of multiple factors including consideration of ensuring financial viability of the sector. It is always a challenging task to the regulatory authorities to balance the interests of several stakeholders involved.
14	It is submitted that the Information Technology, Electronics and Communications (Promotions) Department, Government of Andhra Pradesh vide G.O.MS.No.6 dated 16.07.2021 has notified the “Andhra Pradesh IT Policy 2021-2024” addressing the current needs of the industry. As per the AP IT Policy 2021-2024, the Telecommunications service provider has been defined as: <i>“Telecommunications service provider includes basic telecom service providers (fixed), cellular (mobile) companies, telecom infrastructure companies, Internet Service Providers (ISP) and any</i>	Categorization of activity may differ from one state to another state based on the policies of the state government and local conditions. This has been affirmed by Hon’ble Appellate Tribunal of Electricity in Appeal No. 265 of 2014

	<p><i>other value-added services licensed by Ministry of Electronics and Information Technology (MeitY), Government of India."</i></p> <p>It is further submitted that the AP IT Policy 2021-2024 has expressly included 'Telecom' within the ambit of IT Industry/IT Projects. Also, that the AP IT Policy 2021-2024 has expressly mandated under Paragraph 8 (vi) that all IT Companies operating in Andhra Pradesh shall be eligible for industrial tariff towards their power consumption. As stated above, the AP IT Policy 2021-2024 includes the Telecom Sector within the IT Industry, hence, in light of the same, industrial tariff was made applicable to the telecom sector. Copy of the report dated 29.11.2022 is filed as Annexure No. 4.</p>	<p><i>"The State Commission may take reference from the orders passed by other State Regulatory Commissions while considering the categorization of various class of consumers for tariff applicability but it is not mandatory for compliance, however, the State Commissions have to comply with the principles set out in Sec 62 (3) of the Electricity Act, 2003."</i></p>
15	<p>It is submitted that the Government of Maharashtra, as part of their IT/ITES policy notified the applicability of industrial tariff to the telecommunication towers instead of commercial tariff. It is submitted that the Maharashtra State Electricity Regulatory Commission (MSERC) after taking into consideration the IT/ITeS policy of the Government of Maharashtra specifically categorised Telecommunication Towers in the Industry Tariff vide its order dated 30.03.2020 in Case No. 322 of 2019. In furtherance to the same the Maharashtra State Electricity Distribution Company Ltd. vide Circular Order No. 323 dated 03.04.2020 has revised the electricity tariff for telecommunication towers by placing them in the Industrial Category. The relevant portion of the MSERC order dated 30.03.2020 in Case No. 322 of 2019 on Page 684 and 685 of the said Order are extracted below:</p> <p>"HIGH TENSION (HT) TARIFF</p> <p>HT I: HT - Industry</p> <p>HT I (A): Industry – General Applicability:</p> <p><i>This tariff category is applicable for electricity for Industrial use at High Voltage for purposes of manufacturing and processing, including electricity used within such premises for general lighting, heating/cooling, etc.</i></p>	

	<p><i>It is also applicable for use of electricity / power supply for Administrative Offices / Canteen, Recreation Hall / Sports Club or facilities / Health Club or facilities/ Gymnasium / Swimming Pool exclusively meant for employees of the industry; lifts, water pumps, fire-fighting pumps and equipment, street and common area lighting; Research and Development units, etc. -</i></p> <p><i>Provided that all such facilities are situated within the same industrial premises and supplied power from the same point of supply.</i></p> <p><i>This tariff category shall be applicable for use of electricity / power supply by an Information Technology (IT) or IT-enabled Services (ITeS) Unit as defined in the applicable IT/ITeS Policy of Government of Maharashtra.</i></p> <p><i>It shall also be applicable for use of electricity / power supply for (but not limited to) the following purposes:</i></p> <ol style="list-style-type: none"> <i>1. Flour Mills, Dal Mills, Rice Mills, Poha Mills, Masala Mills, Saw Mills;</i> <i>2. Ice Factories, Ice-cream manufacturing units, Milk Processing / Chilling Plants (Dairy);</i> <i>3. Engineering Workshops, Engineering Goods manufacturing units; Printing Presses; Transformer Repair Workshops; Tyre Remoulding/Rethreading units, and Vulcanizing units;</i> <i>4. Mining, Quarrying and Stone Crushing units;</i> <i>5. Garment Manufacturing units</i> <i>6. LPG/CNG bottling plants, etc.;</i> <i>7. Sewage Treatment Plant/ Common Effluent Treatment Plant for industries, and not covered under the HT – PWW category</i> <i>8. Start-up power for Generating Plants, i.e., the power required for trial run of a Power Plant during commissioning of</i> 	
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	<p><i>the Unit and its Auxiliaries, and for its start-up after planned or forced outage (but not for construction);</i></p> <p>9. <i>Brick Kiln (Bhatti);</i></p> <p>10. <i>Biotechnology Industries covered under the Biotechnology Policy of Government of Maharashtra;</i></p> <p>11. <i>Cold Storages not covered under HT – Agriculture (Others);</i></p> <p>12. <i>Food (including Seafood and meat) Processing units.</i></p> <p>13. <i>Stand-alone Research and Development units.</i></p> <p>14. <i>Seed manufacturing.</i></p> <p>15. <i>Dedicated Water Supply Schemes to Power Plants</i></p> <p>16. <i>Auxiliary Power Supply to EHV/Distribution Substations (but not for construction)</i></p> <p>17. Telecommunications Towers “</p> <p>A copy of the IT/ITES policy of the Government of Maharashtra is filed herewith as Annexure No. 5. A copy of the Maharashtra State Electricity Regulatory Commission’s order dated 30.03.2020 in Case No. 322 of 2019 is filed herewith as Annexure No 6. A copy of the Circular Order No. 323 dated 03.04.2020 issued by Maharashtra State Electricity Distribution Company Ltd. is filed herewith as Annexure No.7.</p>	
16	<p>It is submitted that the National Tariff Policy, 2016 in clause 8.3 lays down principles for “<i>Tariff Design: Linkage of tariffs to cost of services</i>”. One of the principles specifically states that the tariff should progressively reflect the cost of supply of electricity and suggests that appropriate commissions should take steps to ensure that the tariffs are within 20% of the average cost of supply of electricity. However, the present tariff in the State of Telangana in the commercial category is far more than the average cost of supply, especially for the telecom industry.</p>	<p>TS Discoms are trying their level best to ensure that the tariffs are within 20% of the average cost of supply of electricity.</p> <p>It is to be noted that retail supply tariff is a sensitive issue and it involves consideration of multiple factors including consideration of ensuring financial viability of the sector. It is always a challenging task to the regulatory authorities to balance the interests of several stakeholders involved.</p>

	<p>It is pertinent to reiterate that the telecom infrastructure companies are incurring huge capital expenditure and operational costs to smoothly transition the 5G technology as per the Prime Minister's Gatishakthi Programme. The high commercial electricity tariffs currently being charged on the telecommunication towers are only adding to the existing difficulties such as low return on investments and poor revenue realisation in rural areas.</p> <p>Hence, it is the need of the hour for this Hon'ble Commission to review the tariff under the ICT Policy and categorise telecommunication towers under i.e. LT III (A) tariff category i.e. the Industry (General) Tariff Category.</p> <p>A copy of the National Tariff Policy, 2016 is filed herewith as Annexure No. 7.</p>	
17	It is submitted that this Hon'ble Commission has ample power under Sections 61, 62 and 86 of the Electricity Act, 2003 to revise the tariff for telecommunication towers from Commercial Tariff Category to Industrial Tariff Category.	
18	It is submitted that the above stated policies of the Government of Telangana and the Government of India is to enable growth in the IT Industry, not only to attract investments but also in turn to generate employment and grow the infrastructure. Hence, in light of the same it is requested that this Hon'ble Commission may be pleased to consider the present request for change in tariff from Commercial Tariff Category to Industrial Tariff Category.	
19	It is submitted that if the Telecommunication towers are not placed in the Industrial Tariff Category it will cause undue loss to the telecom sector and will hinder the development and progress of the telecom sector.	
20	It is submitted that each of the objections/suggestions/submission is without prejudice to each other. Airtel craves leave of this Hon'ble Commission to make additional submissions at the time of public hearing.	No comment
21	It is submitted that Airtel is filing these objections/suggestions/submissions without prejudice to its rights and contentions under law.	No comment

<p>In view of the above, it is humbly prayed that this Hon'ble Commission may be pleased to revise the tariff towards telecommunication towers and categorise the telecommunication towers under the. LT III (A) tariff category i.e., the Industry (General) Tariff Category under the Telangana's ICT Policy 2021 – 2026, as the same would facilitate affordability of telecom services to the general public and bridge the digital divide.</p>	
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**2023-24 ఆర్థికసంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరలప్రతిపాదనలు, క్రాస్సబ్సిడీసర్పార్ట్ప్రతిపాదనలు
మరియు ట్రా అప్ ఛార్జీలపై కొత్తూ రిరాజు, H .No. 2-4-408/4, నెం.03, క్రాంతినగర్ కాలనీ, రాంనగర్, హనుమకొండ గారి
సూచనలు/సలహాలకు సమాదానాలు**

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TSNPDCL – సమాదానాలు
1	ప్రతి సంవత్సరం పెరుగుతున్న విద్యుత్ ఛార్జీలు సామాన్యడికి గుది బండలా మారుతుంది దయచేసి 200 రెండు వందల Units లోపు వినియోగదారునికి ఎటువంటి అదనపు రుసుము విధించరాదని మనవి.	FY 2023 -24 సంవత్సరానికి గాను NPDCL ఎటువంటి ధరల పెంపుదల ప్రతిపాదించలేదు.
2	అలాగే ACD Charges కూడా వినియోగదారులకే భారమవుతున్నది.	గౌరవనీయమైన విద్యుత్ నియంత్రణ మండలి TSERC రెగ్యులేషన్ నెం.6(2004) ప్రకారం ప్రతి వినియోగదారుడు గత సంవత్సరంలో వినియోగించిన రెండు నెలల సగటు విద్యుత్ వినియోగ యూనిట్లకు సమానమైన సెక్యూరిటీ డిపాజిట్ విద్యుత్ సంస్థ వద్ద నిల్వ ఉంచాలి. ప్రస్తుత బిల్లింగ్ విధానము ప్రకారంగా వినియోగదారుడు వినియోగించిన నెల తరువాత బిల్లు జారీ చేయడము అవుతున్నది మరియు బిల్లు జారీ చేసిన తరువాత 30 రోజుల లోపు బిల్లు చెల్లించడానికి వెసలు బాటు కలదు అనగా మొత్తం రెండు నెలల తర్వాత మాత్రమే వినియోగదారుడు తాను వినియోగించుకున్న విద్యుత్ కు ఛార్జీలను డిస్కం కు చెలిస్తున్నాడు

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		<p>కావున ఒక సంవత్సరంలో విద్యుత్ వినియోగదారుడు వారి సర్వీస్ పై వాస్తవంగా ఉండవలసిన సెక్యూరిటీ డిపాజిట్ ను 2 నెలల సగటు వినియోగ యూనిట్ల ఆధారంగా లెక్కించి నుంచి అంతకు ముందే వారి నూతన సర్వీస్ తీసుకున్నప్పుడు చెల్లించిన డిపాజిట్ ను మరియు అదనపు లోడ్ పెంచినప్పుడు తీసుకున్న సెక్యూరిటీ డిపాజిట్ ను మినహించగా వచ్చిన నికరమొత్తాన్ని అదనపు సెక్యూరిటీ డిపాజిట్ గా (ACD) లెక్కిస్తారు ఇట్టి డిపాజిట్ పై రిజర్వ్ బ్యాంక్ ఆఫ్ ఇండియా నిబంధనల ప్రకారం ప్రతి సంవత్సరం వడ్డీని లెక్కించి నెల బిల్లులలో సర్దుబాటు చెయ్యడం జరుగుతుంది.</p>
3	<p>వినియోగదారులకి విద్యుత్ పొదుపుపై విస్తృత ప్రచార కార్యక్రమాలు నిర్వహించాలి.</p>	<p>" విద్యుత్ ఆదా చేయండి" అనేది TSNPDCL యొక్క ముఖ్యమైన కార్యకలాపంలో ఒకటి. మేము డిపార్ట్మెంట్లోని సిబ్బందికి మరియు విద్యుత్ వినియోగదారులందరికీ విద్యుత్ పొదుపు గురించి అవగాహన కల్పిస్తున్నాము విద్యుత్ శాఖ ద్వారా పలుమార్లు అవగాహన కార్యక్రమాలు నిర్వహిస్తున్నాము కరపత్రాలను పంపిణీ చేయడం మరియు వినియోగదారులతో సమావేశాలు ఏర్పాటు చేయడం మరియు విద్యుత్ భద్రతా వారోత్సవాలు, ERC formation Day ను నిర్వహించి వినియోగదారులకు పొదుపు పై అవగాహన కల్పిస్తున్నాము</p>

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4	సోలార్ విద్యుత్ పై ప్రజల్లో అవగాహన పెంచి 90% సబ్సిడీ పై పరికరాలను ఇస్తే చాలా వరుకు విద్యుత్ అదా చెయ్యవచ్చు.	<p>TSREDCO సమన్వయంతో TSNPDCL, బెంచ్ మార్క్ కాస్ట్ లేదా టెండర్ ధర తక్కువగా ఉండే ధరపైన రెసిడెన్షియల్ సెక్టార్ కోసం కేంద్ర సహాయంతో సోలార్ రూఫ్ టాప్ ప్రోగ్రామ్ను అమలు చేస్తోంది ఈ క్రింది విధంగా పునర్నిర్మించబడింది.</p> <table border="1" data-bbox="1203 496 2028 1170"> <tr> <td data-bbox="1203 496 1608 581">నివాస రంగం రకం</td> <td data-bbox="1608 496 2028 581">CFA</td> </tr> <tr> <td data-bbox="1203 581 1608 665">3 kw వరకు</td> <td data-bbox="1608 581 2028 665">బెంచ్ మార్క్ ధరలో 40%</td> </tr> <tr> <td data-bbox="1203 665 1608 841" rowspan="2">3 kw పైన మరియు 10 kw వరకు</td> <td data-bbox="1608 665 2028 750">40% 3 kw వరకు</td> </tr> <tr> <td data-bbox="1608 750 2028 841">20% 3 kw పైన మరియు 10 kw వరకు</td> </tr> <tr> <td data-bbox="1203 841 1608 1170"> గ్రూప్ హౌసింగ్ సొసైటీలు/రెసిడెన్షియల్ వెల్ఫేర్ అసోసియేషన్లు(GHS/RWA) ఇంటికి 10kwp చొప్పున 500 kwp వరకు సాధారణ సౌకర్యాల కోసం. </td> <td data-bbox="1608 841 2028 1170">20%</td> </tr> </table>	నివాస రంగం రకం	CFA	3 kw వరకు	బెంచ్ మార్క్ ధరలో 40%	3 kw పైన మరియు 10 kw వరకు	40% 3 kw వరకు	20% 3 kw పైన మరియు 10 kw వరకు	గ్రూప్ హౌసింగ్ సొసైటీలు/రెసిడెన్షియల్ వెల్ఫేర్ అసోసియేషన్లు(GHS/RWA) ఇంటికి 10kwp చొప్పున 500 kwp వరకు సాధారణ సౌకర్యాల కోసం.	20%
నివాస రంగం రకం	CFA										
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గ్రూప్ హౌసింగ్ సొసైటీలు/రెసిడెన్షియల్ వెల్ఫేర్ అసోసియేషన్లు(GHS/RWA) ఇంటికి 10kwp చొప్పున 500 kwp వరకు సాధారణ సౌకర్యాల కోసం.	20%										
5	పట్టణాలల్లో 100% ట్రాన్స్మిర్మర్స్ కంచె ఏర్పాటు చేస్తున్నారు. అదే గ్రామాల్లో అసలు ట్రాన్స్మిర్మర్స్ కంచెలు ఏర్పాటు చేయడం లేదు	గ్రామాల లో ఉన్న DTR లకు ఫెన్సింగ్ అవసరం లేదు, ఎందుకంటే ఈ ట్రాన్స్ ఫార్మర్లు మౌంటు రకం, భూమి నుండి తగినంత క్లియరెన్స్ కలిగి									

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	ఎందుకు?	ఉంటుంది.
6	చాలా వరకు గ్రామాలల్లో (గృహ అవసరాలకు) సింగిల్ ట్రాన్స్ ఫర్మర్స్ ఎర్టింగ్ సరిగ్గా లేక (ముఖ్యముగా సమ్మర్) లో ఇళ్లల్లో విద్యుత్ ఉపకరణాలు కాలిపోయి స్లా బులకు షాక్ వస్తుంది. వీటిని శాస్త్రీయంగా ఎర్టింగ్ చేయాలి.	పల్లె ప్రగతి కార్యక్రమంలోనే చాలా వరకు DTR లకు ఎర్టింగ్ చేయబడినది. వివరాలు ANNEXURE-I లో జతపరచబడ్డాయి
7	చాలా వరకు ట్రాన్స్ ఫర్మర్స్ ఆన్/ఆఫ్ ఎబి స్విచ్ సరిగ్గా పని చేయడం లేదు. వాటిని సరిచేయాలి.	DTRS యొక్క పని చేయని AB స్విచ్లు పల్లె ప్రగతి సమయంలో సరిచేయబడ్డాయి మరియు నెలవారీ DTR నిర్వహణ సమయంలో కూడా సరిచేయడం జరుగుతున్నది. మరియు DTR యొక్క పూర్తిగా పాడైపోయిన AB స్విచ్ లను కొత్త వాటితో మార్పడం జరుగుచున్నది. వివరాలు ANNEXURE-II లో జతపరచబడ్డాయి
8	భూపాలపల్లి జిల్లా లో ఏయే కెపాసిటీ గల సబ్ స్టేషన్స్ ఎన్ని ఉన్నాయి ఆయా సబ్ స్టేషన్స్ పరిధిలో ఎన్ని ఫీడర్స్ ఉన్నాయి. ఏయే ఫీడర్ ఎంత పొడవు మరియు ఎన్ని కలిగి ఉంది, ఏయే సబ్ స్టేషన్ క్రింద ఎంత మంది అగ్రికల్చర్ & గృహ వినియోగదారులు ఉన్నారు?	సబ్ స్టేషన్స్ పేరు మరియు ఫీడర్ వివరాలు ANNEXURE-III లో జతచేయబడ్డాయి.

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9	వ్యవసాయంతో జిల్లా వ్యాప్తంగా ఎన్ని .టి.ఆర్. లు ఉన్నవి. వాటి క్రింద ఎన్ని అధికారిక, అనాధికారిక విద్యుత్ కక్షన్స్ ఉన్నవి ?	ఇప్పటికే ఉన్న వ్యవసాయ DTR ల మరియు వ్యవసాయ సర్వీసుల వివరాలు ANNEXURE-IV లో జతచేయబడ్డాయి మరియు అనధికార వ్యవసాయ సర్వీసులు ఏవీ గుర్తించబడలేదు
10	ప్రతి నెల ఎన్ని .టి.ఆర్. లు కాలిపోతున్నవి. వాటిని రైతుల నుండి ఎవరు రిపేరు కేంద్రానికి తలరిస్తున్నారు. రిపేరు చేసి మరల ఎవరు తీసుకెళ్తున్నారు. టి.ఆర్. ల తరలింపుకి ఏవైన ప్రభుత్వ వాహనాలున్నాయా ? లేదా రైతులకి చెల్లిస్తారా? ఎన్ని రోజుల్లో .టి.ఆర్. రిపేరు చేసి ఇస్తారు?	ఫెయిలైన DTRS సంఖ్య మరియు ఫెయిలైన DTRS రవాణా వివరాలు ANNEXURE-V లో జతచేయబడ్డాయి చాలా వరకు ఫెయిలైన DTRలు డిపార్ట్మెంటల్ వాహనం ద్వారా రవాణా చేయబడ్డాయి మాత్రమే. ఒకవేళ, ఫీల్డ్ కండిషన్ సౌకర్యవంతంగా లేనట్లయితే ప్రైవేట్ వాహనాలు రవాణా కోసం ఉపయోగించబడ్డాయి.
11	భూపాలపల్లి జిల్లా లో మొత్తం విద్యుత్ సిబ్బంది ఎంతమంది ఉన్నారు. ఇంకా ఏమైనా ఖాళీలు ఉన్నాయా? ఉంటే ఎటువంటి ఖాళీలు వాటికి సంబంధించిన పూర్తి వివరాలు తెలుపగలరు?	ఇప్పటికే ఉన్న ఉద్యోగుల వివరాలు మరియు ఖాళీ పోస్టుల వివరాలు ANNEXURE-VI లో జతచేయబడ్డాయి.
12	అగ్రికల్చర్స్కి పవర్ 24 గంటలు ప్రీ అన్నారు అది ఎక్కడ అమలు కావడం లేదు. ఎందుకు గృహ అవసరాలకి కూడా చిట్యాల పరిసర గ్రామాలకు విద్యుత్ ఎక్కువగా తీసివేస్తున్నారు ఎందుకు?	వ్యవసాయానికి 24 గంటలు సరఫరా చేయకపోవడానికి అనేక కారణాలున్నాయి ఇట్టి విషయాన్నీ మా గౌరవనీయ CMD / TS TRANSCO సర్ ద్వారా స్పష్టంగా వివరించబడ్డాయి వార్తా పత్రిక. వార్తా కథనం ANNEXURE-VII లో జతచేయబడింది. కరెంటు కోత లేదు చిట్యల్ ఫీడర్ మరియు రోజువారీ సరఫరా 23 గంటల కంటే తక్కువ కాకుండా అందించబడింది.

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TSNPDCL - సమాదానాలు
13	అగ్రికల్చర్ రైతులకు కస్టమర్స్ అని రైతులకు ఇన్ఫర్మేషన్ లేకుండా ఆ .టి.ఆర్. క్రింద ఒక్కరు బిల్లు చెల్లించలేదని పూర్ణ తీసివేస్తున్నారు ఇది సరికాదు, రైతులకి బిల్లు లగురించి గ్రామాల్లో చాటింపు చేయించాలి. ఇన్ఫర్మేషన్ ఇవ్వాలి.	వ్యవసాయ సర్వీసులకు కస్టమర్ ఛార్జీలు తప్పనిసరి. మొదట మేము బిల్లు లనుజారీ చేస్తాము, ఆ తర్వాత ద్వారా ప్రకటించి గ్రామ వీధుల్లో, మేము బిల్లు లుకట్టు మని ప్రచారం చేసిన తర్వాత బిల్లు లుకట్టని వినియోగదారుల కనెక్షన్ మాత్రమే కనెక్ట్ చేస్తాము
14	లూజ్ , వేయాలి. వైర్ తుప్పుపట్టి ఉన్న వాటికి వేయాలి?	ఇప్పటికే వదులుగా ఉన్న లూస్ స్పాన్స్ లను వేసి వాటిని సరిచేశారు పల్లె ప్రగతి కార్యక్రమం ద్వారా కొత్త స్ట్రాండ్ అందించడం ద్వారా వైర్లు మార్చబడ్డాయి వివరాలు ANNEXURE-VIII లో అందించబడ్డాయి

Q6

ANNEXURE-I

DTR Earthing done during Pallepragathi in Bhupalpally District

SL.No.	Name of the District	Name of the Section	NO of Villages/section covered	Village DTRs Earthing	
				Identified	Cummulative Achievement
1	3	4	5	13	15
1	BPL	Bhupalpally Rural	24	96	96
2	BPL	Bhupalpally Town	15	5	5
3	BPL	Regonda	37	248	248
4	BPL	Ghanpur Mulugu	17	159	159
Bhupalpally SD Total			93	508	508
5	BPL	Chityala	25	99	99
6	BPL	RK Pur	24	49	49
7	BPL	Mogullapally	25	107	107
Chityala SD Total			74	255	255
8	BPL	Kataram	24	174	174
9	BPL	Koyyur	15	94	94
10	BPL	Mahadevpur	18	100	100
11	BPL	Mahamutharam	24	114	114
12	BPL	Palimela	8	33	33
Kataram SD Total			89.00	515	515
DIVISION TOTAL			256	1278	1278

ANNEXURE-II

AB Switched repaired during Pallepragathi in Bhupalpally District

SL.N o.	Name of the District	Name of the Section	NO of Villages/section covered	AB switches repaired
				Cummulative Achievement
1	3	4	5	13
1	BPL	Bhupalpally Rural	24	170
2	BPL	Bhupalpally Town	15	50
3	BPL	Regonda	37	225
4	BPL	Ghanpur Mulugu	17	230
Bhupalpally SD Total			93	675
5	BPL	Chityala	25	0
6	BPL	RK Pur	24	40
7	BPL	Mogullapally	25	87
Chityala SD Total			74	127
8	BPL	Kataram	24	246
9	BPL	Koyyur	15	105
10	BPL	Mahadevpur	18	184
11	BPL	Mahamutharam	24	102
12	BPL	Palimela	8	16
Kataram SD Total			89.00	653
DIVISION TOTAL			256	1455

Q8

ANNEXURE-III

Existing sub-stations with 11KV feeder details in Bhupalpally district

S.N	Sub Division	Section	Sub Station	PTR Capacity	Feedr Name	Lengh	No of poles
1	BHOOPALPALLY	BHOOPALPALLY	1015-33KV SS- JANGEDU	2x5MVA	JANGEDU(R) ,,	48	720
2	BHOOPALPALLY	BHOOPALPALLY			KAMALAPUR,,	48	720
3	BHOOPALPALLY	BHOOPALPALLY			KASIMPALLY,,	10	150
4	BHOOPALPALLY	BHOOPALPALLY			JANGEDU(T),,	23	345
5	BHOOPALPALLY	BHOOPALPALLY	0157-33KV SS- BHOOPALPALLY	2x5MVA	BHOOPALPALLY-1,,	15	225
6	BHOOPALPALLY	BHOOPALPALLY			BHOOPALPALLY-2,,	15	225
7	BHOOPALPALLY	BHOOPALPALLY			MANJURNAGAR,,	32	480
8	BHOOPALPALLY	BHOOPALPALLY			KRISHNACOLONY,,	30	450
9	BHOOPALPALLY	BHOOPALPALLY RURAL	0161-33KV SS- GUDADPALLY	1x8MVA	GUDADPALLY,,	60	900
10	BHOOPALPALLY	BHOOPALPALLY RURAL			KOMPALLY,,	20	300
11	BHOOPALPALLY	BHOOPALPALLY RURAL			GORLAVEEDU,,	16	240
12	BHOOPALPALLY	BHOOPALPALLY RURAL			NEREDUPALLY,,	16	240
13	BHOOPALPALLY	BHOOPALPALLY RURAL	0163-33KV SS- NANDIGAMA	1x5MVA+ 1x3.15MV A	DEEKSHAKUNTA,,	24	360
14	BHOOPALPALLY	BHOOPALPALLY RURAL			NANDIGAMA	8	120
15	BHOOPALPALLY				KISTAPUR		0
16	BHOOPALPALLY	BHOOPALPALLY RURAL	0184-33KV SS- PEDDAPUR	1x5MVA+ 1x3.15MV A	PEDDAPUR,,	60	900
17	BHOOPALPALLY	BHOOPALPALLY RURAL			GURRAMPET,,	21	315
18	BHOOPALPALLY	BHOOPALPALLY RURAL			RWS-EXPRESS PEDDAPUR, EXPRESS,	2	30
19	BHOOPALPALLY				EXPRESS,		0
20	BHOOPALPALLY	BHOOPALPALLY RURAL			NARAYANPUR,,	48	720
21	BHOOPALPALLY	BHOOPALPALLY RURAL	1017-33KV SS- AZAMNAGAR	1x5MVA+ 1x3.15MV A	NAGARAM,,	13	195
22	BHOOPALPALLY	BHOOPALPALLY RURAL			WATERGRID,,	16	240
23	BHOOPALPALLY	BHOOPALPALLY RURAL			AZAMNAGAR,,	25	375
24	BHOOPALPALLY	BHOOPALPALLY RURAL	1249-33KV SS- GOLLABUDDARAM	1x5MVA	DUDEKULAPALLI,,	9	135
25	BHOOPALPALLY	BHOOPALPALLY RURAL			PUMPHOUSE,,	1	15
26	BHOOPALPALLY	BHOOPALPALLY RURAL			RAMPUR,,	8	120

Sub Division	Section	Sub Station	PTR Capacity	Feedr Name	Lengh KM	No of poles
27 BHOOPALPALLY	BHOOPALPALLY RURAL	1549-33KV SS-VAJINEPALLY	1x5MVA	GOLLABUDDARAM,,	2	30
28 BHOOPALPALLY	BHOOPALPALLY RURAL			VAJINEPALLY,,	2	30
29 BHOOPALPALLY	BHOOPALPALLY RURAL			GORLAVEEDU,,	4	60
30 BHOOPALPALLY	BHOOPALPALLY RURAL			NEREDUPALLY,,	4	60
31 BHOOPALPALLY	BHOOPALPALLY RURAL			GOPUVARIPALLY,,	3	45
32 BHOOPALPALLY	GHANPUR (MULUG)	0179-33KV SS-CHELPUR	1x5MVA+1x8MVA	SHYAMNAGAR	126	1890
33 BHOOPALPALLY				LIFT IRRIGATION,		0
34 BHOOPALPALLY				DUBBAPALLY		0
35 BHOOPALPALLY	GHANPUR (MULUG)			GOLLAPALLY,,	36	540
36 BHOOPALPALLY	GHANPUR (MULUG)			CHELPUR EXPRESS,	21	315
37 BHOOPALPALLY				CHELPUR AGL,		0
38 BHOOPALPALLY	GHANPUR (MULUG)			1090-33KV SS-GHANPUR	1x5MVA+1x8MVA	WATERGRID,,
39 BHOOPALPALLY	GHANPUR (MULUG)	GANDHINAGAR,,	25			375
40 BHOOPALPALLY	GHANPUR (MULUG)	GHANPUR MULUG,,	10			150
41 BHOOPALPALLY	GHANPUR (MULUG)	NAGARAMPALLY,	120			1800
42 BHOOPALPALLY		BUDDARAM,				0
43 BHOOPALPALLY	GHANPUR (MULUG)	1424-33KV SS-KONDAPUR	1x5MVA			KONDAPURAGL,,
44 BHOOPALPALLY	GHANPUR (MULUG)			BANGLAWPALLE,	15	225
45 BHOOPALPALLY				,SITARAMPUR		0
46 BHOOPALPALLY				KONDAPUREXPRESS		0
47 BHOOPALPALLY	REGONDA	0165-33KV SS-REGONDA	1x8MVA+1x3.15MVA	CHENNAPUR,,	8	120
48 BHOOPALPALLY	REGONDA			REGONDA(T),,	2	30
49 BHOOPALPALLY	REGONDA			THIRUMALAGIRI,,	5	75
50 BHOOPALPALLY	REGONDA			NARAYANPUR,,	4	60
51 BHOOPALPALLY	REGONDA	0166-33KV SS-REPAKA	3x5MVA	KOTANCHA,	27	405
52 BHOOPALPALLY				EXPRESS,		0
53 BHOOPALPALLY	REGONDA			CHALLAGARIGE,,	30	450
54 BHOOPALPALLY	REGONDA			REPAKAPALLY,,	8	120
55 BHOOPALPALLY	REGONDA			KANAPRTHI,	24	360
56 BHOOPALPALLY				REPAKA(T),		0
57 BHOOPALPALLY	REGONDA	0156-33KV SS-	1x5MVA+	RAMANNAGUDEM,,	9	135

	Sub Division	Section	Sub Station	PTR Capacity	Feedr Name	Lengh KM	No of poles
58	BHOOPALPALLY	REGONDA	0150-33KV SS- BAGIRTHIPET	1x3.15MV A	BAGIRTHIPET(T),,	2	30
59	BHOOPALPALLY	REGONDA			POCHAMPALLY,,	5	75
60	BHOOPALPALLY	REGONDA			BAGIRTHIPET(R),,	8	120
61	BHOOPALPALLY	REGONDA	0160-33KV SS- GORIKOTHAPALLY	3x5MVA	GORIKOTHAPALLY EXPRESS,,	1	15
62	BHOOPALPALLY	REGONDA			WATERGRID,,	4	60
63	BHOOPALPALLY	REGONDA			GORIKOTHAPALLY,,	6	90
64	BHOOPALPALLY	REGONDA			KONARAOPET,,	12	180
65	BHOOPALPALLY	REGONDA			JAGGAIHPET,,	10	150
66	CHITYAL	CHITYAL	0158-33KV SS- CHITYAL	2x5MVA	JOOKAL,,	50	750
67	CHITYAL	CHITYAL			NAWABPET,,	20	300
68	CHITYAL	CHITYAL			CHITYAL(T),,	16	240
69	CHITYAL	CHITYAL			GUNTURPALLY,,	30	450
70	CHITYAL	CHITYAL	0159-33KV SS- GIDDEMUTHARAM	2x5MVA	KALVAPALLY,,	6	90
71	CHITYAL	CHITYAL			GIDDEMUTHARAM,,	21	315
72	CHITYAL	CHITYAL			ANDUKUTHANDA,,	30	450
73	CHITYAL	CHITYAL	0162-33KV SS- JADALPET	2x5MVA	BAVSINGPALLY,,	5	75
74	CHITYAL	CHITYAL			NAINAPAKALIFT,lift,	15	225
75	CHITYAL	CHITYAL			NAINPAKA,,	30	450
76	CHITYAL	CHITYAL	1089-33KV SS- GOPALPUR	2x5MVA	GOPALPURTOWN,,	3	45
77	CHITYAL	CHITYAL			VODITHALA,,	3	45
78	CHITYAL	CHITYAL			PONAGANDLA,,	6	90
79	CHITYAL	CHITYAL			MUCHINIPARTHI,,	8	120
80	CHITYAL	MOGULLAPALLY	0188-33KV SS- AKINEPALLY	2x5MVA	POTHUGALLU,,	44	660
81	CHITYAL	MOGULLAPALLY			RAGHAVAREDDYPETA ,,	24	360
82	CHITYAL	MOGULLAPALLY			AKINEPALLY,,	45	675
83	CHITYAL	MOGULLAPALLY			DUBYALA,,	40	600
84	CHITYAL	MOGULLAPALLY	0192-33KV SS- MOGULLAPALLY	2x5MVA	KURIKSHALA,,	7	105
85	CHITYAL	MOGULLAPALLY			ANKUSHAPUR,,	6	90
86	CHITYAL	MOGULLAPALLY			VAGODDUPALLY,,	24	360
87	CHITYAL	MOGULLAPALLY			ANKUSHAPUR, MOGULLAPALLY,,	10	150
88	CHITYAL	MOGULLAPALLY	0193-33KV SS- MOTLAPALLY	2x5MVA	MULKALAPALLY,,	16	240
89	CHITYAL	MOGULLAPALLY			PARLAPALLY,,	7	105
90	CHITYAL	MOGULLAPALLY			VEMULAPALLY,,	20	300
91	CHITYAL	MOGULLAPALLY	0197-33KV SS- RANGAPUR	2x5MVA	RANGAPUREXPRESS,,	15	225
92	CHITYAL	MOGULLAPALLY			VENKATAPUR,,	30	450
93	CHITYAL	MOGULLAPALLY			ISSIPETA,,	11	165
94	CHITYAL	MOGULLAPALLY			NARSINGAPUR,,	9	135
95	CHITYAL	MOGULLAPALLY	1277-33KV SS- VEMULAPALLY	1x5MVA	VEMULAPALLYTOWN, BANGLAPALLY,,	0	0
96	CHITYAL	MOGULLAPALLY				3	45
97	CHITYAL	MOGULLAPALLY					

S.N	Sub Division	Section	Sub Station	PTR Capacity	Feedr Name	Lengh KM	No of poles
98	CHITYAL	MOGULLAPALLY	0167-33KV SS-TEKUMATLA	2x5MVA	VEMULAPALLYRURAL,	6	90
99	CHITYAL	RAMAKRISHNAPUR			GUMMADEVELLI,,	12	180
100	CHITYAL	RAMAKRISHNAPUR			TEKUMATLA EXPRESS,,	4	60
101	CHITYAL	RAMAKRISHNAPUR			SUBBAKAPALLY,	30	450
102	CHITYAL				SUBBAKAPALLY LIFT IRR,		0
103	CHITYAL	RAMAKRISHNAPUR			TEKUMATLA(R),,	24	360
104	CHITYAL	RAMAKRISHNAPUR			0164-33KV SS-RAMAKISTAPUR	2x5MVA	EMPAID,,
105	CHITYAL	RAMAKRISHNAPUR	GARIMILLAPALLY,,	8			120
106	CHITYAL	RAMAKRISHNAPUR	ASHIREDDYPALLY,,	12			180
107	CHITYAL	RAMAKRISHNAPUR	VELISHALARURAL,,	6			90
108	CHITYAL	RAMAKRISHNAPUR	1170-33KV SS-VENKATRAOPALLY	1x5MVA			BORNAPALLY,,
109	CHITYAL	RAMAKRISHNAPUR			SHATHARAJUPALLY,,	4	60
110	CHITYAL	RAMAKRISHNAPUR			VENKATRAOPALLYB,,	1	15
111	CHITYAL	RAMAKRISHNAPUR			LIFTIRRIGATION,,	3	45
112	CHITYAL	RAMAKRISHNAPUR	1248-33KV SS-VELLAMPALLY	1x5MVA	EMPAID,	6	90
113	CHITYAL				VELLAMPALLYSSHQ,		0
114	CHITYAL	RAMAKRISHNAPUR			KUNDANPALLY,,	2	30
115	CHITYAL	RAMAKRISHNAPUR			VELLAMPALLYRURAL,,	6	90
116	KATARAM	KATARAM	0440-33KV SS-KATARM	2x5MVA	KATARAMRURAL,,	6	90
117	KATARAM	KATARAM			ADIVARAMPET,,	8	120
118	KATARAM	KATARAM			KATARAMMHQ,,	28	420
119	KATARAM	KATARAM			NASTURUPALLY,,	24	360
120	KATARAM	KATARAM			CHINTAKANI,,	28	420
121	KATARAM	KATARAM	1338-33KV SS-DAMERAKUNTA	2x5MVA	GUNDRATHIPALLY,,	7	105
122	KATARAM	KATARAM			VILASAGAR,	24	360
123	KATARAM				DAMERAKUNTAAGL,		0
124	KATARAM	KATARAM			DAMERAKUNTA,,	6	90
125	KATARAM	KATARAM			DHANVADA SS H Q,	10	150

	Sub Division	Section	Sub Station	PTR Capacity	Feedr Name	Lengh KM	No of poles		
126	KATARAM		0437-33KV SS-DHANWADA	2x5MVA	GUDUR,		0		
127	KATARAM	KATARAM			SHANKARAMPALLY,,	7	105		
128	KATARAM	KATARAM			GATLAKUNTA,,	8	120		
129	KATARAM	KATARAM			JINNING MILL,,	12	180		
130	KATARAM	KATARAM			DEVRAMPALLY,,	24	360		
131	KATARAM	KATARAM			KONDAMPET,	100	1500		
132	KATARAM		0438-33KV SS-GANGARAM	2x5MVA	DAMERAKUNTA,		0		
133	KATARAM	KATARAM			GANGARAMEXPRESS,,	14	210		
134	KATARAM	KATARAM			GANGARAM,,	40	600		
135	KATARAM	KOYYUR			ADAVALAPALLY,,	24	360		
136	KATARAM	KOYYUR			DABBAGATTU,	100	1500		
137	KATARAM				MALLARAM,		0		
138	KATARAM	KOYYUR	0443-33KV SS-MALLARAM	1x8MVA	CHINNATHUNDLA,,	21	315		
139	KATARAM	KOYYUR			0444-33KV SS-NACHARAM	1x3.15MV A	NACHARAM,	40	600
140	KATARAM						ANSANPALLY,		0
141	KATARAM	KOYYUR	0446-33KV SS-THADICHARLA	2x5MVA	MANERU,,	14	210		
142	KATARAM	KOYYUR			THADICHARLAMHQ,,	6	90		
143	KATARAM	KOYYUR			KAPURAM,,	13	195		
144	KATARAM	KOYYUR			ERRAGUNTA,,	42	630		
145	KATARAM	KOYYUR			0447-33KV SS-VALLAMKUNTA	2x5MVA	PV NAGAR,	16	240
146	KATARAM		NAGULAMMA,				0		
147	KATARAM	KOYYUR	EDLAPALLY,,	18			270		
148	KATARAM	KOYYUR	EXPRESS,,	6			90		
149	KATARAM	KOYYUR	KOYYUR ,,	16			240		
150	KATARAM	KOYYUR	1337-33KV SS-RUDRARAM	1x5MVA	RUDRARAM,,	18	270		
151	KATARAM	KOYYUR			CHIGURUVELLI,,	2	30		
152	KATARAM	KOYYUR			BASWAPUR,,	10	150		
153	KATARAM	KOYYUR	1346-33KV SS-PEDDATHUNDLA	1x5MVA	PEDDATHUNDLA,	24	360		
154	KATARAM				PEDDATHUNDLA(T),		0		
155	KATARAM	KOYYUR			GADAMPALLY,,	6	90		
156	KATARAM	KOYYUR			SATRAJPALLY,,	12	180		
157	KATARAM	MAHADEVPUR	0441-33KV SS-MAHADEVPUR	2x5MVA	KUDURUPALLI,,	12	180		
158	KATARAM	MAHADEVPUR			IDCFDR,,	24	360		
159	KATARAM	MAHADEVPUR			BOMMAPUR,,	12	180		
160	KATARAM	MAHADEVPUR			MAHADEVPUR MHQ,,	7	105		
161	KATARAM	MAHADEVPUR	0439-33KV SS-KALESHWARAM	2x3.15MV A	KALESHWARAMSSHQ,	16	240		
162	KATARAM	MAHADEVPUR			MEGGA,,	10	150		
163	KATARAM	MAHADEVPUR			ANNARAM,,	30	450		
164	KATARAM	MAHADEVPUR			KALESHWARAM,	12	180		
165	KATARAM				METPALLY,		0		
166	KATARAM	MAHADEVPUR			AMBATPALLY,,	10	150		

	Sub Division	Section	Sub Station	PTR Capacity	Feedr Name	Lengh KM	No of poles
167	KATARAM	MAHADEVPUR	0445-33KV SS- PEDDAMPET	2x3.15MV A	PEDDAMPETA SS HQ,	16	240
168	KATARAM				ICHAMPALLY,		0
169	KATARAM	MAHADEVPUR	1032-33KV SS- SURARAM	1x5MVA	RAPALLIKOTA,,	12	180
170	KATARAM	MAHADEVPUR			SURARAM,,	12	180
171	KATARAM	MAHADEVPUR			BEGLOOR,,	15	225
172	KATARAM	MAHAMUTHARAM	0442-33KV SS- MAHAMUTHARAM	1x5MVA	MULUGUPALLI,	26	390
173	KATARAM				Polampally,		0
174	KATARAM	MAHAMUTHARAM			YAMANPALLY,,	20	300
175	KATARAM	MAHAMUTHARAM			MAHAMUTHARAM,,	4	60
176	KATARAM	MAHAMUTHARAM	0436-33KV SS- BORLAGUDEM	1x5MVA	NARSINGAPUR,,	14	210
177	KATARAM	MAHAMUTHARAM			SINGARAM,,	4	60
178	KATARAM	MAHAMUTHARAM			KANUKUNUR,,	17	255
179	KATARAM	PALIMELA	1031-33KV SS- SARVAIPET	1x5MVA	PANKENA,,	68	1020
180	KATARAM				LIFTIRRIGATION		0
181	KATARAM				WATERGRID		0
182	KATARAM	PALIMELA			SARVAIPET,,	2	30
183	KATARAM	PALIMELA			ICHAMPALLY,,	16	240

S NO	Name of the district	Cat Wise services			Remarks
		1	5	Total	
1	Bhupalpally District	105909	43330	149239	Details of 1,49,239 services are enclosed seperately

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ANNEXURE-IV

Existing of AGL DTRs and AGL Services in Bhupalpally district

S NO	Name of the section	NO of AGL DTRs	NO OF AGL SERVICES
1	Chityal	712	5273
2	Mogullapally	1113	5664
3	RK Pur	944	5008
4	Regonda	1558	7597
5	Bhupalpally	105	813
6	Bhupalpally Rural	575	3987
7	Ghanpur	454	2973
8	Kataram	558	2567
9	Koyyuru	944	4615
10	Mahadevpur	589	2855
11	Mahamutharam	312	1641
12	Palimela	64	332
Total		7928	43325

Q10

Q10

ANNEXURE-V

Failed DTRs transported by Dept Vehicle in Bhupalpally District

S NO	Name of the Month	NO of DTRs failed	No of failed DTRs transported by Dept Vehicle	No of failed DTRs transported by private Vehicle	% of transportation by Dept vehicle
1	Jun-22	105	84	21	80.00
2	Jul-22	179	138	41	77.09
3	Aug-22	245	134	111	54.69
4	Sep-22	138	96	42	69.57
5	Oct-22	161	106	55	65.84
6	Nov-22	179	124	55	69.27
7	Dec-22	117	102	15	87.18
8	Jan-22	132	122	10	92.42

Avaiable of Departement Vehicles for transportation

- 1 Utility van of ADE/OP/Bhupalpally
- 2 Utility van of ADE/OP/Chityal
- 3 Utility van of ADE/OP/Kataram
- 4 3T Utility van of DE/OP/Bhupalpally

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NORTHERN POWER DISTRIBUTION COMPANY OF T. S. LIMITED

MIS RETURN for the month of JANUARY - 2023, of DEE/OP/BHUPALPALLY & AAO/ERO/BHUPALPALLY AS ON 31.01.2023..

Sl. No.	Name of the Post	Sanctioned	Filled	Vacant	Vacant Position in Nos.	Controlling Officer	Remarks
1	D.E.E.	1	1	0	-	-	-
2	AAO	2	1	1	1No. AAO/ERO/Kataram	DEE/OP/Bhupalpally	-
3	A.D.E.	3	3	0	-	-	-
4	AAE/AE	14	11	3	1 No. AE/Comm/D.O. Bhupalpally	DEE/OP/Bhupalpally	-
					1No. AE/Tech/D.O./Bhupalpally	DEE/OP/Bhupalpally	-
					1No. AE/Op/Chityal	ADE/Op/Chityal	-
5	JAO	5	5	0	-	-	-
6	SUB-ENGINEER	17	17	0	-	-	-
7	Sr.Assistants	8	7	1	1 No. AAO/ERO/Bhupalpally	AAO/ERO/Bhupalpally	-
					1No. Cash section & 1 No. ADM Section	DEE/OP/Bhupalpally	-
8	Jr.Assistants	27	7	20	1No. ADE/Op/Kataram Sub-Division	ADE/Op/Kataram	-
					17Nos. AAO/ERO/Bhupalpally	AAO/ERO/Bhupalpally	-
					1No. ADM section	DEE/OP/Bhupalpally	-
10	R.A.	1	0	1	1No. ADM section	DEE/OP/Bhupalpally	-
					1No. AE/Tech/D.O/ Bhupalpally	DEE/OP/Bhupalpally	-
11	O.S.	4	2	2	1No. JAO/Cash/D.O/Bhupalpally	DEE/OP/Bhupalpally	-
					1No. DEE/Op/Bhupalpally	DEE/OP/Bhupalpally	-
					1No. AAO/ERO/Bhupalpally	AAO/ERO/BHUPALPALLY	-
12	SWEEPER	2	0	2	1No. DEE/Op/Bhupalpally,	DEE/OP/Bhupalpally	-
					1No. AAO/ERO/Bhupalpally	AAO/ERO/BHUPALPALLY	-
13	Watchman	3	0	3	1No. DEE/Op/Bhupalpally,	DEE/OP/Bhupalpally	-
					1No. ADE/Operator/Bhupalpally	ADE/Operation/Bhupalpally	-
					1No. AAO/ERO/Bhupalpally	AAO/ERO/Bhupalpally	-
14	FOREMEN	3	3	0	-	-	-
15	S.L.I.	5	5	0	-	-	-
16	L.I.	26	24	2	1No. AE/Op/Mogullapally	ADE/OP/Chityal	-
					1No. AE/Op/Palimela	ADE/Op/Kataram	-

Sl. No.	Name of the Post	Sanctioned	Filled	Vacant	Vacant Position in Nos.	Controlling Officer	Remarks
17	L.M.	60	54	6	1No. Jadalpet of AE/Op/Chityal	ADE/Op/Chityal	-
					1No. Nandigama of AAE/Op/Bhupalpally Rural	ADE/Op/Bhupalpally	-
					1No. Ghanpur(M) of AE/Op/Ghanpur(M)	ADE/Op/Bhupalpally	-
					1No. Mahadevpur of AE/Op/Mahadevpur	ADE/Op/Kataram	-
					1No. Kaleshwaram of AE/Op/Mahadevpur	ADE/Op/Kataram	-
					1No. Rudraram of AE/Op/Koyyur	ADE/Op/Kataram	-
					1No. PEDDAPUR	AAE/OP/BHUPALPALLY®	-
					1No. CHALLAGARIGE	AAE/OP/CHITYAL	-
					1No. BHP(LSubhash colony)	AE/OP/BHUPALPALLY(TT)	-
					1No. Jangedu	AE/OP/BHUPALPALLY(TT)	-
18	LMD	1	1	0	*1No. BHP(LRajivnagar)	AE/OP/BHUPALPALLY(TT)**	-
					1No. BHP(LManjum nagar)	AE/OP/BHUPALPALLY(TT)	-
					1No. Bhupalpally(Town)	AE/OP/BHUPALPALLY(TT)	-
					1No. Bhupalpally(Town)	AE/OP/BHUPALPALLY(TT)	-
					1No. Bhupalpally(Town)	AE/OP/BHUPALPALLY(TT)	-
					1No. Regonda (T)	AE/OP/REGONDA	-
					1No. Bhagirthipet	AE/OP/REGONDA	-
					1No. Thirumalagiri	AE/OP/REGONDA	-
					1No. Chinakodepaka	AE/OP/REGONDA	-
					1No. Repaka	AE/OP/REGONDA	-
					1No. Regonda	AE/OP/REGONDA	-
					1No. Dhammanapeta	AE/OP/REGONDA	-
					1No. Ponangandla	AE/OP/REGONDA	-
					1No. Gorikothapally	AE/OP/REGONDA	-
					1No. Gollabuddaram	AAE/OP/BHUPALPALLY®	-
					1No. Nagaram	AAE/OP/BHUPALPALLY®	-

AL.M.

Sl. No.	Name of the Post	Sanctioned	Filled	Vacant	Vacant Position in Nos.	Controlling Officer	Remarks
19	ALM	68	1	67	1No. Motlapally	AAE/OP/MOGULAPALLY	-
					1No. Parlapally	AAE/OP/MOGULAPALLY	-
					1No. Mogulapally	AAE/OP/MOGULAPALLY	-
					1No. Dubyala	AAE/OP/MOGULAPALLY	-
					1No. Vemulapally	AAE/OP/MOGULAPALLY	-
					1No. Rangapur	AAE/OP/MOGULAPALLY	-
					1No. Mulukalapally	AAE/OP/MOGULAPALLY	-
					1No. Akinepally	AAE/OP/MOGULAPALLY	-
					1No. Jadalpet	AAE/OP/CHITTAL	-
					1No. Gopalpur	AAE/OP/CHITTAL	-
					1No. Giddemutharam	AAE/OP/CHITTAL	-
					1No. Chainpaka	AAE/OP/CHITTAL	-
					1No. Nainpaka	AAE/OP/CHITTAL	-
					1No. Nawabpet	AAE/OP/CHITTAL	-
					1No. Gummadavelly	AAE/OP/RAMAKISTAPUR	-
					1No. Raghavapoor	AAE/OP/RAMAKISTAPUR	-
					1No. Venkatrapally	AAE/OP/RAMAKISTAPUR	-
					1No. Ankushapoor	AAE/OP/RAMAKISTAPUR	-
					1No. Ramakrishnapur(V)	AAE/OP/RAMAKISTAPUR	-
1No. Tekumata	AAE/OP/RAMAKISTAPUR	-					
1No. Ghanpur(M)	AAE/OP/GHANPUR(M)	-					
1No. Chelpur	AAE/OP/GHANPUR(M)	-					
1No. Dharmaraopet	AAE/OP/GHANPUR(M)	-					
1No. Kondapur	AAE/OP/GHANPUR(M)	-					
1No. Buddaram	AAE/OP/GHANPUR(M)	-					
1No. Karkapally	AAE/OP/GHANPUR(M)	-					
1No. Chintakani	AAE/OP/KATARAM	-					
1No. Kataram	AAE/OP/KATARAM	-					
1No. Gangaram	AAE/OP/KATARAM	-					

Sl. No.	Name of the Post	Sanctioned	Filled	Vacant	Vacant Position in Nos.	Controlling Officer	Remarks
20	J.L.M.	67	62	5	1No. Dhanwada	AAE/OP/KATARAM	Filled with JLM
					1No. Damerakunta	AAE/OP/KATARAM	-
					1No. Mahadevapur	AE/OP/MAHADEVPUR	-
					1No. Peddampet	AE/OP/MAHADEVPUR	-
					1No. Kaleshwaram	AE/OP/MAHADEVPUR	-
					1No. Suraram	AE/OP/MAHADEVPUR	-
					1No. Beglur	AE/OP/MAHADEVPUR	-
					1No. Thadicharla	AAE/OP/KOYYUR	-
					1No. Vallankunta	AAE/OP/KOYYUR	-
					1No. Mallaram	AAE/OP/KOYYUR	-
					1No. Peddathundla	AAE/OP/KOYYUR	-
					1No. Rudraram	AAE/OP/KOYYUR	-
					1No. Ansanpally	AAE/OP/KOYYUR	Filled with JLM
					1No. Kozdampet	AAE/OP/KOYYUR	-
1No. Gadampally	AAE/OP/KOYYUR	-					
1No. Ansanpally	AE/OP/MAHAMUTHARAM	-					
1No. Borlaguddem	AE/OP/MAHAMUTHARAM	-					
1No. Mahamutharam	AE/OP/MAHAMUTHARAM	-					
1No. Neredupally	AAE/OP/BHUPALPALLY*	-					
1No. Kasimpally	AE/OP/BHUPALPALLY(T)	-					
1No. Krishna colony	AE/OP/BHUPALPALLY(T)	-					
1No. Guddepally	AE/OP/REGONDA	-					
1No. Kanaparthyp	AE/OP/REGONDA	-					
Total:		318	204	114			

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ANNEXURE-VIII

Providing of Middle Poles at various locations during Palle Pragathi Programme in Bhupalpally district

SL.No.	Circle	Name of the Section	Erection of Middle/Intermediate Poles	
			Identified	Cummulative Achievement
1	2	4	9	11
1	BPL	Bhupalpally Rural	60	60
2	BPL	Bhupalpally Town	6	6
3	BPL	Regonda	178	178
4	BPL	Ghanpur Mulugu	228	228
Bhupalpally SD Total			472	472
5	BPL	Chityala	307	307
6	BPL	RK Pur	260	260
7	BPL	Mogullapally	325	325
ChityalaSD Total			892	892
8	BPL	Kataram	425	425
9	BPL	Koyyur	340	340
10	BPL	Mahadevpur	212	212
11	BPL	Mahamutharam	188	188
12	BPL	Palimela	107	107
KataramSD Total			1272	1272
DIVISION TOTAL			2636	2636