



SARVOTHAM CARE

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27th December,2023.

To,

The Chief General Manager(RAC),
TSSPDCL, Corporate Office,
First Floor, Mint Compound,
Hyderabad-63.

Dear Sir,

Sub: Comments and suggestions on the report of the Grid Coordination Committee (GCC) for analysis on the issue of Levy of Grid Support Charges (GSC) for FY 2023-24 – Reg.

We respectfully submit our comments and suggestions regarding the proposed Grid Support Charges (GSC) for FY 2023-24, as outlined in the report of the Grid Coordination Committee (GCC). Our concern lies in the expansion of the scope of the levy to all generating stations, a departure from the original intention to impose charges solely on co-located captive generating stations.

The initial rationale for applying GSC to co-located captive generating stations was the benefit derived from grid support in the form of backup power during the failure of their captive generating stations. However, we observe that the GCC, primarily comprising utility officers, has broadened the scope without adequate justification, overlooking the opinions of the majority of industry members.

It is crucial to note that solar plants meet their auxiliary power requirements through a separate HT connection. The GCC's recommendations on Parallel Operating Charges/Grid supporting charges for FY 2023-24 refer to the APERC order dated 8th February 2002 and the subsequent Hon'ble Supreme Court Judgement dated 29th November 2019 (Civil Appeal No.4569 of 2003) between The APTRANSCO (Appellant) & M/s.Rain Calcining Industries & other Respondents.

Our concern is specifically related to M/s.Sarvotham Care CPP, whose capacity is only 3000KVA as per the LTOA agreement with TSSPDCL. In this CPP capacity, we are allocated 51.67%, i.e., 1550KVA to our Captive consumer M/s.Sarvotham Care, BJH 1015. This allocation is significantly less compared to the Connected Maximum Demand (CMD) of M/s.Sarvotham Care (BJH1015), which is 2500KVA.

The evident disparity in CPP capacity and CMD with TSSPDCL restricts our ability to utilize the maximum demand from our CPP. Additionally, our captive consumer is already paying 80% of the Demand Charges and minimum energy charges.

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- PERSONAL CARE PRODUCTS
- HOME CARE PRODUCTS
- BTS OFFICES
- SOLAR POWER

BTS Office : Sarvotham Building,
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In light of these considerations, we kindly request the exemption of CPPs generating power from renewable energy sources like solar from the proposed "Parallel Operating /Grid supporting charges" outlined by the Grid Coordination Committee for FY 2023-24.

We believe that such an exemption is justified based on the unique characteristics and operational requirements of renewable energy CPPs. Your understanding and consideration of our concerns will contribute to a fair and equitable regulatory framework for the upcoming fiscal year.

Thank you for your attention to this matter. We look forward to a favorable resolution.

Thanking You Sir.

For M/s.Sarvotham Care,

Authorised Signatory.



Copy Submitted to:

1. The Commission Secretary, TSERC.

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