

# Southern Power Distribution Company of Telangana Ltd (TGSPDCL)



Responses to Objections / Suggestions

On

**Filings of Aggregate Revenue Requirement (ARR) of Distribution Business and Determination of Wheeling Tariff proposals for 5th Control Period i.e., FY 2024-25 to FY 2028-29**

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2	Sri. Suresh Kumar Singhal, The Federation of Telangana Chambers of Commerce and Industry (FTCCI), Federation House, Federation Marg, 11-6-841, Red Hills, Hyderabad 500004.	14-16
3	Sri. Narendra Baldwa, Telangana and Andhra Plastics Manufacturers Association (TAAPMA), 914, 9th Floor, Raghava Ratna Towers, Chirag Ali Lane, Abids, Hyderabad-500001.	17
4	Sri. Vinod Kumar Agarwal Telangana Iron & Steel Manufacturers Association (TISMA) Regd. Office: Flat No. 101, 1st Floor, Satya Sarovar Apt, Ghansi Bazar, Near High Court, Hyderabad-500002.	18-19
5	Sri. R K Agarwal Telangana Spinning & Textile Mills Association (TSTMA) Surya Towers, 1st Floor, Sardar Patel Road, Secunderabad 500 003.	20
6	Sri S. Surya Prakasa Rao Former Director (Commercial),erstwhile APCPDCL and Former Secretary, erstwhile APERC,Flat.no.105, Ashok Chandra Enclave, 11-4-660, Redhills Hyderabad-500004 Mobile : 9392272754	21-30
7	M. Thimma Reddy Convenor Peoples- Monitoring Group on Electricity Regulation H. No. 3-4-107/1, (Plot No. 39), Radha Krishna Nagar, Attapur, Hyderabad -500048	31-41
8	G.R. Karunakar, Plot No. 56, Lakshmi Megha Township, Ragannaguda, Abdullahpurmet, Ranga Reddy, Hyderabad-501510	42-53
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10	Ramu, Nallakunta, Hyderabad	
11	J. Sri Ranga Rao, Ho.No. 503,2-2-18/18/7, DD Colony, Hyderabad	

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12	Dr. AV Rao, H.No. 12-13-483/39/1, St.No. 14, Lane-6, Nagarjuna Nagar, Tarnaka, Hyderabad		
13	G. Vinod Kumar H.No. 16-3-V/361, Plot No. 361, Vasant Nagar, Kukat Pally, Hyderabad.		
14	Madulaganti Sridhar Reddy, 504, 2-1-174, Rajputh Residency,Nallakunta, Hyderabad		
15	M. Rajareddy20-160/1/1, RB Nagar,Shamshabad, Hyderabad		
16	K. Jasyantha Reddy, 11-1-78/2, Bharath Nagar, Siddipet		
17	Panyala Venkat Reddy, Sri Chakra Puram , KushaiGuda		
18	Gadenge Gajendar Goud, Nagarkunta, Shamshabad, Ranga Reddy Dist		
19	Satha Rao Ashok Reddy Pedda Maddanur, Nagarkurnool		
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21	Saniseti Swami Nandivaddimanu, Banjanpalle, Nagarkurnool.		
22	Amber Anand Rao, BrahmanPally, Tadvai, Kamareddy		
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24	MPL Steel Industries Pvt Ltd Reg office: MPL House, 13-6-439/1/A/111/10&11, Balaji Nagar, Pillar No. 75, Mehdipatnam Ring Road, Hyderabad.		
25	South Indian Cement Manufacturers Association (SICMA) Administrative office: 3rd Floor, 36th Square, Plot No, 481, Road No. 36 , Jubliee Hills, Hyderabad. 5000034		55-56

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56	Sirike krushnaiah Potireddypalli Vill, Kosli Madl, Narayanpet Dist	
57	Prayas (Energy Group)	

**1. Sri. M. Venugopala Rao, Senior Journalist & Convener, Centre for Power Studies H.No.1-100/MP/101, Monarch Prestige, Journalists, Colony, Serilingampally Mandal , Hyderabad - 500 032**

Sl.No.	Summary of Objections/Suggestions	Response of the License																																																
1	<p>In response to the query of the Hon'ble Commission on delay in filing the subject petitions, the reasons given by the DISCOMs are untenable. In response to my requests made in my preliminary submissions dated 23.9.2024, the Hon'ble Commission has conveyed in its reply dated 27.9.2024 that it "is not inclined to extend the last date for submission of objections/comments on the filings of Licensees." It has further stated that "in addition to submission of objections/comments, the stakeholders can also submit their objections/comments in the scheduled public hearings. The Commission recognizes the contribution of the submissions of knowledgeable and interested stakeholders and the same will be considered." Since the Hon'ble Commission has not responded to the reasons given by us in support of our requests, we are constrained to come to the conclusion that it is inclined to complete the entire regulatory process in eight petitions within the unreasonably short period of time and issue its orders and that it has condoned the delay in filing the subject petitions. As such, we are making submissions on the petitions to the extent possible in view of the constraints of time given.</p>	Under purview of the Hon'ble Commission																																																
2	<p>TGDISCOMs have submitted the following projections for their distribution business for the 5<sup>th</sup> control period:</p> <table border="1"> <thead> <tr> <th></th> <th align="center">2024-25</th> <th align="center">2025-26</th> <th align="center">2026-27</th> <th align="center">2027-28</th> <th align="center">2028-29</th> </tr> </thead> <tbody> <tr> <td>SPDCL:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Total capex</td> <td align="right">4,794</td> <td align="right">5,785</td> <td align="right">7,194</td> <td align="right">7,180</td> <td align="right">7,504</td> </tr> <tr> <td>ARR (Rs.crore)</td> <td align="right">5,663</td> <td align="right">6,525</td> <td align="right">8,415</td> <td align="right">9,750</td> <td align="right">11,166</td> </tr> <tr> <td>Contracted capacity (MVA)</td> <td align="right">3,788</td> <td align="right">3,928</td> <td align="right">4,074</td> <td align="right">4,227</td> <td align="right">4,386</td> </tr> <tr> <td>Wheeling charges (Rs/kVA/month)</td> <td align="right">440</td> <td align="right">475</td> <td align="right">575</td> <td align="right">623</td> <td align="right">668</td> </tr> <tr> <td>NPDCL:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Total capex</td> <td align="right">1,584</td> <td align="right">1,947</td> <td align="right">2,887</td> <td align="right">2,667</td> <td align="right">2,731</td> </tr> </tbody> </table>		2024-25	2025-26	2026-27	2027-28	2028-29	SPDCL:						Total capex	4,794	5,785	7,194	7,180	7,504	ARR (Rs.crore)	5,663	6,525	8,415	9,750	11,166	Contracted capacity (MVA)	3,788	3,928	4,074	4,227	4,386	Wheeling charges (Rs/kVA/month)	440	475	575	623	668	NPDCL:						Total capex	1,584	1,947	2,887	2,667	2,731	No Comments
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4	<p>In view of availability of abnormal quantum of surplus power during the 5th control period, as projected by the DISCOMs, it is to be clarified whether the projected surplus power also is taken into account for the contracted capacity projected by them. If so, addition of distribution network capacity and projected capital expenditure would be unwarranted, as such a capacity would become idle.</p>	<p>Telangana's power demand has been growing at rapid pace. For instance, as evident in the peak demand of Hyderabad in FY 2024-25, it has registered one of the highest power demanded by any of the Indian metropolitan cities. This clearly indicates that capacity augmentation works need to be kept in tune with the rapid growth in power demand which is primarily being driven by growth in service sectors. Hence it is reasonable to believe that capacities would not become idle going further.</p>																																				
5	<p>In response to the query of the Hon'ble Commission, both the DISCOMs have agreed to recalculate their requirements for 90% of the capacities, as they have segregated assets for wheeling business and retail supply business in the ratio of 90:10, respectively. The Hon'ble Commission is expected to consider the revised projections submitted by the DISCOMs for their</p>	<p>The revised submission which segregates the assets for distribution and retail supply business has been submitted to the Honorable Commission for their consideration</p>																																				

	<p>distribution business for the 5th control period subjecting them to prudence check. As such, their projected ARR and wheeling charges should come down.</p>	
<p>6</p>	<p>The DISCOMs have proposed aggregate distribution losses and charges irrespective of the voltage level, i.e., 33 kv, 11 kv and LT, on par with inter and intra-state transmission system to mitigate financial losses and requested the Hon'ble Commission to approve the same. I request the Hon'ble Commission to examine the following points, among others:</p> <p><b>a)</b> Determination of aggregate distribution losses and charges irrespective of the voltage levels would increase burden of consumers drawing power at higher KV level. In other words, consumers at higher levels of KV will have to cross subsidise consumers at lower KV levels, in addition to the cross subsidy, if any, they are paying already as a part and parcel of the tariffs being determined by the Commission.</p> <p><b>b)</b> It is an accepted principle, reality and standard practice that distribution losses and distribution costs at different levels of KV are different. That is the reason why successive Commissions have been determining different wheeling charges at different levels of KV.</p> <p><b>c)</b> If the principle of uniformity proposed by the DISCOMs is acceptable and accepted, then, the same principle should be implemented for working out cost of service to all categories of consumers in the entire state, irrespective of the level of KV at which they are being served.</p> <p><b>d)</b> The contention of the DISCOMs that notification dated 17th January, 2024, on formula for computation of wheeling charges, with the proviso that the appropriate Commission may determine the wheeling charges at different voltage levels separately, is only a suggestion by MoP, GoI, and not mandatory is untenable. The very fact that the MoP, GoI, is constrained to issue the said notification, as a matter of correction to its notification dated 10.1.2024, within one week, itself is an admission that its first notification is deficient and does not recognize the authority of the Hon'ble Commission.</p> <p>Section 79.2 of Regulation No.2 of 2023 of TGERC says: "provided further that the Wheeling Charges shall be determined separately for LT voltage, 11 kv voltage, and 33 kv voltage, as applicable." The Commission is expected to follow its Regulation, unless it is amended.</p>	<p>The proposal for moving towards uniform wheeling charges and losses similar to the systems adopted by inter state and intra state transmission system would lead to a simplified tariff structure, bring in transparency in billing process and would help in streamlining the process of grid planning going further. This would also help in improving administrative efficiency and lead to better resource allocation and lesser disputes related to undue variations in wheeling charges being levied on consumers.</p> <p>Further with distributed generation picking up pace, every consumer going further would become a prosumer and voltage wise segregation for levying wheeling charges may be of very little significance.</p> <p>As part of Retail Supply Business is concerned, the losses are considered as per respective voltage levels and the CoS was arrived. However, for the Distribution business, the Uniform wheeling losses and charges are arrived which are applicable for the consumers intend to opt open access system. Hence, this proposal does not effect the retail supply consumers of the Discom.</p>



<p>7</p>	<p>In support of their proposal for uniform wheeling charges, the DISCOMs have contended that</p> <p><b>a)</b> The roof-top solar installations are increasing at a rapid pace under Net Metering/Gross Metering/PM Surya Ghar schemes launched by GoI. As such when the consumer loads under such metering are low, the surplus power generation will flow in reverse direction to 11 kv system.</p> <p><b>b)</b> In PM-KUSUM Comp-‘C’, the solar power plants of capacities 0.5 to 2 MW are coming up in 11 kv system at rapid pace. During non-agriculture loads periods, the solar power generated will flow in reverse direction to 33 kv system.</p> <p><b>c)</b> In PM-KUSM Comp-‘B’, Grid tied Solar pump sets, during the periods of non-operation of solar pump sets after yielding crops, the solar power generated will flow in reverse direction to 33 kv system.</p> <p><b>d)</b> Reduction in the cost of the Solar Panels and rules and regulations framed by the Government are encouraging the installation of Solar power plants and is increasing rapidly and there is a possibility of reverse flow of the power from 11kv to 33 kv system.</p> <p><b>e)</b> Hybrid Solar and Wind system are coming up leading to continuous generation of power and there is a possibility of Reverse flow of power during the periods of Low-loads.</p> <p><b>f)</b> Battery Energy Storage System may come up under LT and 11 kv systems and there is a possibility of reverse flow of power during the periods of Low-loads from 11 kv to 33 kv system.</p> <p><b>g)</b> Under the above stated conditions of distributed power generation scenarios, the Distribution Losses will increase and the Licensee will always face High Energy Losses in the Network burdening with high Network Cost. These are some of the issues, and there are many more problems, both technical and financial, with renewable energy, connected with intermittence and integration of RE with the grid. We had made elaborate submissions on the problems associated with RE, in our submissions made earlier on the proposals of RPPO made by the Commission and in our other submissions made earlier. Governments and the DISCOMs are not concerned with such problems and additional burdens, when long-term PPAs are entered into with developers and middle-man public utilities of the GoI like SECI and NRVNL for purchase of RE indiscriminately, and they extol the virtues of RE, international commitments given by Prime Minister Modi on adding RE, need for environmental protection, etc. What has constantly been ignored is the need for maintaining equilibrium to the extent technically practicable between demand curve and</p>	<p>Intermittency of power generation prevalent with RE technologies such as solar and wind are inherent in nature due to externalities such as weather conditions, time of day, time of season etc. However, RE power projects are known for lower levelized cost of tariffs which can help Discoms in optimizing its power purchase cost, the benefits of which shall be passed on to the consumers of Discoms. Further, with Government of India’s vision of increasing the share of RE consumption in India’s consumption mix will lead to increased RE uptake going further. The Discoms have factored in all of the above scenarios as currently we are in a cusp of energy transition with more focus on sustainability. Hence, with distributed generation expected to garner pace in the medium to long run, Discoms have proposed for uniform wheeling tariffs similar to the regime adopted with intra-state and inter-state transmission systems.</p>
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	power mix, when entering into long- term PPAs and regulatory consents to the same are being given. When, as a result of implementing the policies of the GoI, problems with RE are arising, GoTS and its DISCOMs should demand the GoI to compensate them for the same, instead of penalizing the consumers by imposing avoidable additional burdens on them.	
8	DISCOMs should have submitted details of the problems that have been faced as a result of purchasing unwarranted RE under long-term PPAs during the 4th control period like backing down thermal power and paying fixed charges for the same in order to purchase high-cost and must-run RE and purchasing power at higher costs in the market to meet peak deficit as RE cannot meet it.	No, thermal power plants have been backed down for the drawal of power from the RE Plants under long term PPAs during the 4th Control Period. However, to meet the peak demand the Discom purchased the power from the short term sources in critical times.
9	GoTS, its DISCOMs and the Commission are expected to take a holistic and balanced view when entering into, or giving consents to, PPAs with new power plants, especially RE units, in order to ensure balance between demand curve and power mix to the extent technically practicable. Such an approach is imperative when targets under RPPO are determined. Interests of the state should be important and outweigh the declarations or notifications of the GoI. Availability of abnormal quantum of surplus power, unwarranted quantum of RE and the financial and technical problems associated with them are indicative of the failures of commission and omission in this regard on the part of the powers-that-be, as experience over the years has been proving.	The Discom has entered long term PPAs with mix of contracts including RE to optimize the power purchase cost. The surplus power are only intermittent due to variation in the Demand, seasonal factors. The Discom has sold the surplus power in the market whenever the price is more than the average variable cost of the power plants with which it has tied up agreements.
10	DISCOMs should have submitted consolidated and comprehensive account of their distribution business during the 4th control, giving details of expansion of network, capital cost incurred, results achieved vis a vis targets, whether they exceeded expenditure approved by the Commission, surplus power backed down and fixed charges paid therefor, etc. Similarly, they should have submitted details of their achievements or otherwise of various targets under other capex and results thereof. Also, the DISCOMs should have submitted consolidated details of their claims for true-up or true-down for the 4th control period. Examination of all these would help examine and determine requirements for the 5th control period and issuing MYT order by the Hon'ble Commission in a realistic manner. This is all the more necessary, as, compared to growth in contracted capacity projected for the 5th control period, growth in expenditures, ARR and wheeling charges is relatively higher. So is the case, when all these factors projected are compared with those of the last year of the 4th control period, i.e., 2023-24.	The DIscoms have already filed the APRs for Distribution business upto 4th year of the 4th Control period and the Hon'ble Commission passed the order after prudence check up. The proposed asset additions for the 5th Control Period has been estimated on the basis of the growth in demand/sales, and the required infrastructure to support such growth in sales. Further, the Licensee submits that the proposed asset additions would be capitalized as per prevailing regulations / norms and the same will be reflected in the true-up's for the respective time period.

<p>11</p>	<p>For smart meters, TGNPDCL has projected an expenditure of Rs.3560 crore for the 5th control period. TGSPDCL has not shown it separately. The Hon'ble Commission has already 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 revenue 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? How many consumers have consented for installation of pre-paid meters? I once again request the Hon'ble Commission to reexamine the following points, among 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 GoI.</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 GoI, 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 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 GoI 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?</p> <p>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.</p> <p>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</p>	<p>Installation of smart meters / replacement of existing energy meters with smart meters is a measure that will bring in more efficiency in Discoms' billing and collection process. This will ultimately lead to better service delivery by Discoms and ultimately the benefit for the same will be passed on to the consumers. As smart meters installation is a country wide exercise being done basis guidelines / policy measures by Ministry of Power, Government of India, it is apt that TGDiscoms budget the capital expenditure that would be incurred for smart meters installation for its consumers. The Smart meters will also help the consumers to monitor their real time consumption and billing pattern. It will also help in peak load management with the participation of consumers voluntarily and avoid high power purchase cost from short term sources by the Discoms. Enabling the smart meters in the prepaid mode will help the Discoms to realize the revenue and avoid arrears.</p>
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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.

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 after due date. 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.

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?

o) Neither the governments, nor the Central Electricity Authority, nor the DISCOMs, nor ERCs have any power to direct installation of pre-paid meters, without willingness of the consumers concerned to take the same. Section 47(5) of the Electricity Act, 2003, says, “A distribution licensee shall not be entitled to require security in pursuance of clause (a) of sub-section (1) if the person requiring the supply is prepared to take the supply through a pre-payment meter.” Directions or orders of the authorities cannot override the applicable law. Has the Hon’ble Commission given its approval to the DISCOMs for procurement of pre-paid meters, and, if so, with what conditions? If consumers do not opt for pre-paid meters, what will the DISCOMs do with the pre-paid meters purchased or to be purchased by them?

We once again 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, without the consumers opting for the same.

<b>2. Replies to the Objections/Suggestions raised on Distribution Business ARR &amp; Wheeling Tariff Proposals for 5<sup>th</sup> Control Period by Sri Suresh Kumar Singhal, President of FTCCI Federation House, Federation Marg, # 11-6-841, Red Hills, Hyderabad-500004.</b>		
<b>S.No.</b>	<b>Summary of Objections / Suggestions</b>	<b>Response of the Licensee</b>
1	The instant petitions have been filed by TG discoms for the determination of ARR & Wheeling Tariffs for Distribution Business for FY 2024-29 and determination of ARR for Retail Supply Business for FY 2024-29 & Tariff Proposals for FY 2024-25. The instant petition has been filed by both the discoms under the Telangana State Electricity Regulatory Commission (Multi Year Tariff) Regulation, 2023 (MYT Regulations 2023).	No Comments
2	<p>Multi-year Tariff for FY 2024-29 – Regulation 6 of the TSERC (Multi Year Tariff) Regulation, 2023 provides for the filing of the MYT petition by 30th November. The relevant extracts of the same are reproduced as under:  “6 Procedure for filing Petition  6.2 The petitions to be filed for each Control Period under this Regulation area under:  b) Multi Year Tariff petition shall be filed by 30th November of the year preceding the first year of the Control Period by transmission licensee, distribution licensee (for wheeling business) and SLDC comprising:  i. True-up of preceding year;  ii. Aggregate Revenue Requirement for each year of the Control Period;  iii. Proposal of Tariff and Charges for each year of the Control Period.  c) Multi Year Tariff petition shall be filed by 30th November of the year preceding the first year of the Control Period by distribution licensee (for retail supply business) comprising:  i. True-up of preceding year;  ii. Aggregate Revenue Requirement for each year of the Control Period;  iii. Revenue from retail sale of electricity at existing tariffs &amp; charges and projected revenue gap for the first year of the Control Period;  iv. Proposal of consumer category wise retail supply tariff and charges for</p>	The DISCOM has already filed APR for Distribution Business for 4th year of the 4th control period and the Hon'ble commission has passed the order. The APR for Distribution Business for 5th year will be filed as per the schedule. For Retail Supply Business, the True-ups for FY 2022-23 will be filed along with APR for DB.

	<p>first year of the Control Period: Provided that the Multi Year Tariff petitions for the Control Period commencing from 01.04.2024 shall be filed by generating entity, transmission licensee, distribution licensee and SLDC on or before 31.01.2024.”</p> <p>Based on the above, it is clear that the instant petition lacks on 2 fronts: The Licensees have not filed the application for the True up of previous year (which is FY 2022-23) for Distribution and Retail Supply business (ref Regulation 6.2(b)(i) and 6.2(c)(i) respectively). The Petitioner has filed the instant Petition after a prolonged delay of ~10 months (July 2024 and September 2024 respectively for Distribution and RST business)) which in the opinion of the Objector is not appropriate. The reasoning put forth by the Licensees seems to be an afterthought to cover up for the substantial delay caused at the Licensee’s end. On account of instant filings in non-compliance of the MYT Regulations 2023, the Petitioner’s submissions merit non-consideration</p>	
3	<p>The Hon’ble Commission in the Order dated 07.06.2024 in the matter of Annual Performance Review of Distribution Business for FY 2022-23 has approved a Revenue Surplus of Rs. 1736.34 crore and Rs. 2227.42 Crore for TGSPDCL and TGNPDCL respectively. The relevant extracts from such Order is as under:  “4.12 RECOVERY OF REVENUE GAP/(SURPLUS)  4.12.1 As per Clause 10.5 of Regulation 04 of 2005 the Commission directs the Applicant to include and propose the adjustment mechanism of the total approved revenue surplus for TGSPDCL for Rs. 1736.34 crore (gap of Rs.20.54 crore for FY 2019- 20, surplus of Rs. 253.05 crore for FY 2020-21, surplus of Rs. 1114.66 crore for FY 2021-22 and surplus of Rs. 389.17 Crore for FY 2022-23) and revenue surplus for TGNPDCL for Rs. 2227.42 Crore (surplus of Rs.384.76 Crore for FY 2019-20, surplus of Rs. 354.02, surplus ofRs. 634.03 Crore and surplus of Rs 854.62 Crore) in its end of control period review petition for 4th control period. This Order is corrected and signed on this the 7th day of June, 2024.”</p>	<p>Clause 4.12.1 of order dated 07.06.2024 on Annual Performance Review of Distribution Business states that the adjustment mechanism of the total approved revenue surplus is to be proposed in the end of control period review petition for 4th Control Period. The last petition for 4th Control period i.e., for FY 2023-24 is yet to be filed by TG Discoms wherein the adjustment mechanism would be provided as per directions given in the aforementioned order.</p>

	<p>It is mentioned that the impact of Revenue Gap pertaining to the True up of FY 2019-20 to FY 2022-23 has to be passed in the Retail supply business. The Hon'ble Commission is sincerely submitted to consider the impact of True up of Distribution business in the RST for FY 2024-25</p>	
4	<p>The petitioner (TGSPDCL) has claimed asset additions to the tune of Rs. 31,589 Crore for the Control period FY 2025-29 which is significantly high compared to the actual Capital Cost capitalized by the Distribution Licensees in the previous control period (FY 2019-24). Notably, such high level of projections for Capital cost is injurious to the financial health of the Distribution licensees as non-capitalization of the projected capital cost would effectively result into the revenue surplus which is against the principles of reasonable cost recovery</p>	<p>The proposed asset additions had been estimated on the basis of the growth in demand/sales, and the required infrastructure to support such growth in demand/sales to ensure reliable and quality power supply. Further, the Licensee submits that the proposed asset additions would be capitalized as per prevailing Regulations / norms and the same will be reflected in the true-ups for the respective time period.</p>



**3. Replies to the Objections/Suggestions raised on Distribution Business ARR & Wheeling Tariff Proposals for 5th Control Period by Sri Narendra Baldwa, President of Telangana Andhra Plastics Manufactures Association, 914, 9th Floor, Raghava Ratna Towers, Chirag Ali Lane, Abids, Hyderabad - 500001.**

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>TELANGANA AND ANDHRA PLASTICS MANUFACTURERS ASSOCIATION (TAAPMA) will be submitting the detailed comments / objections on the petitions filed by TG Genco and TG DISCOMs, at the time of public hearing on TG Genco 5th MYT petition and TGDISCOMs ARR and Wheeling charges for 5th MYT Period and FPT and CSS for FY 2024-25, as the time is very less for submitting the same. We request the Hon'ble Commission to accept our request give us the opportunity to appear in person at the Public Hearing on 21st and 23rd of October, 2024.</p>	<p align="center">No Comments</p>

**4. Replies to the Objections/Suggestions raised on Distribution ARR & Wheeling Tariff Proposals for 5<sup>th</sup> Control Period by Sri Vinod Kumar Agarwal, General Secretary of Telangana Iron and Steel Manufactures Association (TISMA), Regd. Office: Flat No. 101, 1<sup>st</sup> Floor, Satya Sarovar Apt, Ghansi Bazar, Near High Court, Hyderabad -500002**

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>The instant petitions have been filed by TG discoms for the determination of ARR &amp; Wheeling Tariffs for Distribution Business for FY 2024-29 and determination of ARR for Retail Supply Business for FY 2024-29 &amp; Tariff Proposals for FY 2024-25. The instant petition has been filed by both the discoms under the Telangana State Electricity Regulatory Commission (Multi Year Tariff) Regulation, 2023 (MYT Regulations 2023).</p>	<p>No Comments</p>
2	<p>Multi-year Tariff for FY 2024-29 – Regulation 6 of the TSERC (Multi Year Tariff) Regulation, 2023 provides for the filing of the MYT petition by 30th November. The relevant extracts of the same are reproduced as under:  “6 Procedure for filing Petition 6.2 The petitions to be filed for each Control Period under this Regulation area under:  b) Multi Year Tariff petition shall be filed by 30th November of the year preceding the first year of the Control Period by transmission licensee, distribution licensee (for wheeling business) and SLDC comprising:  i. True-up of preceding year;  ii. Aggregate Revenue Requirement for each year of the Control Period;  iii. Proposal of Tariff and Charges for each year of the Control Period.  c) Multi Year Tariff petition shall be filed by 30th November of the year preceding the first year of the Control Period by distribution licensee (for retail supply business) comprising:  i. True-up of preceding year;  ii. Aggregate Revenue Requirement for each year of the Control Period;  iii. Revenue from retail sale of electricity at existing tariffs &amp; charges and projected revenue gap for the first year of the Control Period;  iv. Proposal of consumer category wise retail supply tariff and charges for first year of the Control Period: Provided that the Multi Year Tariff petitions for the Control Period commencing from 01.04.2024 shall be filed by generating entity, transmission licensee, distribution licensee and SLDC on or before 31.01.2024.”  Based on the above, it is clear that the instant petition lacks on 2 fronts:  The Licensees have not filed the application for the True up of previous year (which is FY 2022-23) for Distribution and Retail Supply business (ref Regulation 6.2(b)(i) and 6.2(c)(i) respectively). The Petitioner has filed the instant Petition after a prolonged delay of ~10 months (July 2024 and September 2024 respectively for Distribution and RST business)) which in the opinion of the Objector is not appropriate. The reasoning put forth by the Licensees seems to be an afterthought to cover up for the substantial delay caused at the Licensee’s end.  On account of instant filings in non-compliance of the MYT Regulations 2023, the Petitioner’s submissions</p>	<p>The DISCOM has already filed APR for Distribution Business for 4th year of the 4th control period and the Hon'ble commission has passed the order. The APR for Distribution Business for 5th year will be filed as per the schedule. For Retail Supply Business, the True-ups for FY 2022-23 will be filed along with APR for Distribution Business. The Hon'ble Commission had passed the MYT Regulation No. 2 of 2023 on 31st December 2023 in which a new regulatory regime was proposed and there were changes introduced in the calculation methodology as well as introduction of new tariff components. With so many changes introduced, it would be impractical for TG Discoms to adopt to the new regulatory regime, collect the necessary data required for computation of new line items.  a) TG Discoms have filed the condonation of delay petition before the Hon'ble Commission with all the reasons stated.  b) TG Discoms have mentioned the reasons in the Condonation of Delay petition filed before the Hon'ble Commission</p>

	merit non-consideration	
3	<p>The Hon'ble Commission in the Order dated 07.06.2024 in the matter of Annual Performance Review of Distribution Business for FY 2022-23 has approved a Revenue Surplus of Rs. 1736.34 crore and Rs. 2227.42 Crore for TGSPDCL and TGNPDCL respectively. The relevant extracts from such Order is as under:</p> <p>“4.12 RECOVERY OF REVENUE GAP/(SURPLUS)</p> <p>4.12.1 As per Clause 10.5 of Regulation 04 of 2005 the Commission directs the Applicant to include and propose the adjustment mechanism of the total approved revenue surplus for TGSPDCL for Rs. 1736.34 crore (gap of Rs.20.54 crore for FY 2019- 20, surplus of Rs. 253.05 crore for FY 2020-21, surplus of Rs. 1114.66 crore for FY 2021-22 and surplus of Rs. 389.17 Crore for FY 2022-23) and revenue surplus for TGNPDCL for Rs. 2227.42 Crore (surplus of Rs.384.76 Crore for FY 2019-20, surplus of Rs. 354.02, surplus ofRs. 634.03 Crore and surplus of Rs 854.62 Crore) in its end of control period review petition for 4th control period. This Order is corrected and signed on this the 7th day of June, 2024.”</p> <p>It is mentioned that the impact of Revenue Gap pertaining to the True up of FY 2019-20 to FY 2022-23 has to be passed in the Retail supply business. The Hon'ble Commission is sincerely submitted to consider the impact of True up of Distribution business in the RST for FY 2024-25</p>	<p>Clause 4.12.1 of order dated 07.06.2024 on Annual Performance Review of Distribution Business states that the adjustment mechanism of the total approved revenue surplus is to be proposed in the end of control period review petition for 4th Control Period. The last petition for 4thControl period i.e., for FY 2023-24 is yet to be filed by TG Discoms wherein the adjustment mechanism would be provided as per directions given in the aforementioned order.</p>
4	<p>The petitioner (TGSPDCL) has claimed asset additions to the tune of Rs. 31,589 Crore for the Control period FY 2025-29 which is significantly high compared to the actual Capital Cost capitalized by the Distribution Licensees in the previous control period (FY 2019-24). Notably, such high level of projections for Capital cost is injurious to the financial health of the Distribution licensees as non-capitalization of the projected capital cost would effectively result into the revenue surplus which is against the principles of reasonable cost recovery</p>	<p>The proposed asset additions had been estimated on the basis of the growth in demand/sales, and the required infrastructure to support such growth in demand/sales to ensure reliable and quality power supply. Further, the Licensee submits that the proposed asset additions would be capitalized as per prevailing Regulations / norms and the same will be reflected in the true-ups for the respective time period.</p>

**5. Replies to the Objections/Suggestions raised on Distribution ARR & Wheeling Tariff Proposals for 5<sup>th</sup> Control Period by Sri R.K. Agarwal, Chairman to Telangana Spinning and Textile Mills Association, Surya Towers, 1<sup>st</sup> Floor, Sardar Patel Road, Secunderabad – 500003.**

<b>S.No.</b>	<b>Summary of Objections / Suggestions</b>	<b>Response of the Licensee</b>
1	<p>Referring to the subject cited, this is to bring to the notice of the Hon<sup>ble</sup> Commission that, they said filings were uploaded on the websites of either TGERC or on TGSPDCL with a delay of two days after the notice published in Newspapers. Since the availability of information is delayed by two days, and keeping in view the Dasara Festival from October 2nd (Dasara Navaratrulu) and 11th October, the last date for submission of comments and objections being a festival day, we request the Hon<sup>ble</sup> Commission to extend the last date for submission of comments. TG Transco has also filed the ARR and proposed charges for Transmission Business and SLDC for FY 2024-25 to FY 2028-29 and the last date for submission of the comments is again 11/10/2024. Keeping in view the enormity of the data to be analyzed and the huge amount of work involved, it is difficult to complete the work by 11th October as the number of working days are also few due to festival days.</p>	<p>The DISCOMs have considered the projections of Sales, availability of power, Energy Requirement, Transmission and Distribution Losses and the Network additions majorly from the approved Resource Plan &amp; Business Plan Dated 29.12.2023. The Hon<sup>ble</sup> Commission is requested to finalize the ARR and Tariff based on the filings of DISCOMs in order to overcome further financial burden on account of increase in power purchase cost experienced day to day by the DISCOMs.</p>

**6. Replies to the Objections/Suggestions raised on Distribution Business ARR & Wheeling Tariff Proposals for 5<sup>th</sup> Control Period 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	<p>A. Preliminary submissions</p> <p>At the outset the Discom deserves compliments for the efforts made in compiling and providing elaborate data to facilitate objective study by stakeholders. It is a matter of consolation to consumers (except HT – 33kv and above) that no tariff hike is proposed in these filings except moderate increase in Fixed / Demand Charges.</p> <p>However, Hon’ble Commission may have to take a view whether it is desirable to allow tariff revision at this stage considering the following aspects:</p> <p>a).The filings are made after 6 months of the Financial Year. The Commission has to follow elaborate process to conduct the proceedings as required u/s 64 of the Electricity Act, for which around 90 days may be required though the Act allows 120 days.</p> <p>b). Discom didn’t propose any substantial tariff revision for most of the consumer classes except HT consumers, for whom the proposed revision of energy charges is unreasonable and irrational as explained in para 2 hereinafter.</p> <p>c). The additional revenue expected from revised Tariff is mere Rs.1028 Crs (2.5%) out of the total Annual Revenue Requirement of Rs. 40,788 Crs for 2024-25.</p> <p>d). Bulk of this 1028 Crs, is expected from 33kv and 132 kv Industrial consumers whose sales forecast appears to have been overestimated as explained hereinafter.</p> <p>e). Revised Tariffs can take effect only prospectively after one week from the date of publication of the revised Tariffs as per Sec.26 (6) of the AP Electricity Reforms Act, 1998 read with the Electricity Act,</p>	<p>The delay caused in filing of Tariff petition has been explained in the said petitions.</p> <p>In order to ensure cost recovery, the licensees have proposed to increase in tariff in light of increase of costs.</p> <p>The category wise sales fore cast is based on the CAGR as was illustrated in the petitions.</p>

	<p>2003.consumers.</p> <p>g). Any attempt to compress the schedule for determination of tariff may send wrong signals to the stakeholders of power sector.</p> <p>f). If the effective date of new tariff is not synchronized with meter reading / billing cycle, it will cause additional work to Discoms and inconvenience to</p>																									
B-1	<p>The Discom considered growth rate of 17.68 % for 33kv Industrial-General (HT-I(A)) consumption on the basis of 3 yrs average, which was reported as follows (para 3.1.2)</p> <table border="1"> <thead> <tr> <th>Year</th> <th>sales in MU</th> <th>growth (%)</th> </tr> </thead> <tbody> <tr> <td>2017-18</td> <td>3568</td> <td></td> </tr> <tr> <td>2018-19</td> <td>4410</td> <td>19 %</td> </tr> <tr> <td>2019-20</td> <td>4174</td> <td>(-) 5 %</td> </tr> <tr> <td>2020-21</td> <td>3546</td> <td>(-) 15 %</td> </tr> <tr> <td>2021-22</td> <td>4534</td> <td>28 %</td> </tr> <tr> <td>2022-23</td> <td>5442</td> <td>20 %</td> </tr> <tr> <td>2023-24</td> <td>5778</td> <td>6 %</td> </tr> </tbody> </table> <p>The negative growth in 2019-20 and 2020-21 is attributable to the slump in industrial production during Covid-19 pandemic. The 3 year growth rate with ref to such negative values gives inflated growth rates.</p> <p>Similarly in the case of 132 kv Industrial consumption, the Discom adopted a growth rate of 31% on 3 year average basis. But there was negative growth of (-)20% in 2018-19 and (-) 9 %, in 2019-20, turning to the positive growth trajectory of 2.5 % in 2020-21, 41% in 2021-22, 54% in 2022-23, but only 3 % in 2023-24.</p> <p>Suggestion : Hon'ble Commission may please make appropriate correction to the growth rates of 33kv and 132kv Industrial-General category with ref to the actual consumption in the 1st half-year of 2024-25</p>	Year	sales in MU	growth (%)	2017-18	3568		2018-19	4410	19 %	2019-20	4174	(-) 5 %	2020-21	3546	(-) 15 %	2021-22	4534	28 %	2022-23	5442	20 %	2023-24	5778	6 %	<p>There is a rise in industrial activity post COVID and the licensee expects the same trend to continue in the future. Moreover, increase of IT parks/SEZ/Industries/pharma city etc. is anticipated by the licensee which results in higher industrial activity. From the objector's own submission, it is observed that there was a 19% increase in industrial sales in FY 2018-19 as compared to FY 2017-18 even though both the years fall in the preCOVID era. Hence, Licensee feels it is prudent to consider higher growth rates for HT Industrial consumption, given the expected increase in industrial activity</p>
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2020-21	3546	(-) 15 %																								
2021-22	4534	28 %																								
2022-23	5442	20 %																								
2023-24	5778	6 %																								
B-2	<p>The main proposal of tariff revision in these filings is equating the energy charges of 33kv and above category Industrial-General consumers with that of 11 kv Industrial-General category and some other categories. This is</p>	<p>As per the clause 8.3(2) of the National Tariff policy- 2016, the Commission should notify a roadmap such that tariffs are brought within +/- 20% of Average Cost of Supply. The licensee</p>																								

<p>unreasonable and irrational for the following reasons:</p> <p>a). The statutory guidelines u/s 61 of the Electricity Act mandate among others,</p> <p>(i). Safeguarding consumers' interest and at the same time recovery of cost of electricity in a reasonable manner</p> <p>(ii). Tariff progressively reflect the cost of supply of electricity and reduces the X-subsidies in the manner specified by the Appropriate Commission</p> <p>(iii). Appropriate Commission shall be guided by the National Electricity Policy and Tariff Policy</p> <p>b). National Electricity Policy observes that X- subsidies hide in efficiencies and should be reduced progressively and gradually.</p> <p>The Tariff Policy requires the Commissions to notify road map to bring tariffs within +/-20% of Average Cost of Supply.</p> <p>c). With the proposed increase of energy charges from Rs.7.15 to Rs.7.65 / unit for 33kv and from 6.65 to 7.65 / unit for 132 kv, the tariff for Industrial-General consumers will work out to Rs. 8.57 / unit including the component of about 92 paise per unit towards Demand Charge @ Rs. 500/Kva/ month at 75 % load factor.</p> <p>d). Cost of Supply as per filings (para 6.3.2) 11kv Industrial-General : Rs.7.63/unit 33kv Industrial-General : Rs. 5.64/unit 132kv Industrial-General : Rs. 5.13/unit</p> <p>e). Thus these 33kv and 132 kv consumers will be contributing X-subsidy of about Rs.3 / unit and Rs.3.50 / unit respectively, which works to about 50% of COS for 33kv and 65% of COS for 132kv Industrial-General category consumers which is highly exorbitant and prohibitive.</p> <p>f). In these filings, the Discom proposed X-Subsidy Surcharge for Open Access consumers at Rs.1.68 / unit for 33kv and Rs. 1.58 / unit for 132kv consumers. It is unfair to charge tariff which contains X-subsidy component of Rs 3 to 3.5 / unit</p>	<p>would bring to the notice of the Hon'ble Commission that projected Average Cost of Supply for FY 2024-25 for the licensee is higher than approved Average Cost of Supply for FY 2023-24. In order to ensure cost recovery, the licensees have proposed to increase in tariff in light of increase of costs</p> <p>The licensee would also like to mention that the cross-subsidy surcharge has been computed as per clause 8.5 of the National Tariff Policy-2016.</p> <p>Further, the objector has mentioned about creation of regulatory asset. However, clause 8.2.2 of the National Tariff Policy-2016 mentions that under business-as-usual conditions, no regulatory asset shall be created. Moreover, as per clause 23 of Electricity (Amendment) Rules, 2024 there shall not be any gap between approved ARR and revenue from approved tariff except under natural calamity conditions. Hence the licensee is not in favor of creating a regulatory asset. Full recovery of costs incurred by the licensee through tariff will help improve its financial position, enabling licensee to provide quality and uninterrupted supply to its consumers</p>
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	<p>to its own consumers which is 100% higher compared to open access consumers.  Suggestions :</p> <p>(i).In view of the circumstances explained by the Discom for the delay in the filings and in view of the position stated above, Hon'ble Commission may retain the existing tariffs across the board for all categories of consumers including HT.</p> <p>(ii). As the Revenue Deficit may increase marginally consequent to correction in growth rates of sale of energy under subsidizing categories, the Net Revenue Deficit (after accounting for the subsidy by State government u/s 65 of the Act) may be treated as a Regulatory Asset and its recovery may be spread equally over the balance 4 year period of the 5th Control Period (2025 – 29) in the interest of consumers as well as Discom.</p>	
B-3	<p>The following broad picture emerges from the filings of the Discom for 2024-25 (figures rounded off please) :</p> <p>Energysales</p> <p>Sales to LT consumers : 29,903 MU (48 %)</p> <p>Sales to HT consumers : 25,456 MU (41 %)</p> <p>Energy losses : 6,677 MU (11 %)</p> <p>Total Energy Requirement: 62,036 MU</p> <p>RevenuesatcurrenttariffsAnnual Revenue Requirement: 40,788 Crs Revenue from LT sales : 12, 716 Crs (31% )</p> <p>Revenue from HT sales: 21, 940 Crs (54 %)</p> <p>Revenue from other sources : 94 Crs Revenue Gap : (-) 5,957 Crs (15 %)</p> <p>After apportioning the energy losses between HT and LT sales, the HT categories consume about 45% of total energy and contribute 54 % of total Revenues while LT categories consume about 55% of total energy and contribute only about 31 %</p>	<p>The sales of subsidizing categories depend on multiple factors such as nature of the industries and production cycle basis the market dynamics. The voltage wise, category wise Retail tariff proposed by the DISCOMs in the filings are within +/- 20% of ACoS as per NTP 2016. Uniform wheeling charges are proposed to recover the Fixed Cost of the DISCOM due to switching over of the consumers to Open Access.</p>



	<p>of total Revenues leading to revenue deficit of about 15 %.</p> <p>Cost of Supply</p> <p>Cost of Supply at LT : Rs. 8.62 / unit</p> <p>Cost of Supply at HT : Rs. 5.89 / unit Average</p> <p>Cost of Supply : Rs.7.37 /unit Average Realisation and C-R ratio</p> <p>LT supply : Rs 4.25 /unit 49.30 %</p> <p>HT supply : Rs. 8.90 /unit 151.00 %</p> <p>Thus it's expedient for the Discom to sustain / improve the energy sales to subsidizing categories under HT and LT with appropriate initiatives /relaxation in terms and conditions of supply if necessary. Any proposal to increase tariff of these categories will be counterproductive to the objective of improving Revenues and financial health of Discoms.</p>	
B-4	<p>Electrical Accidents: (items 8 and 9 under earlier Directives and item 6 and 7 under new Directives) The Discom stated that the root-cause analysis was made as directed by the Commission and report submitted in its Lr.dt.22-6-2024. The Discom also stated that the awareness programs are being conducted and safety equipment is provided to the O&amp;M staff to avoid Electrical Accidents. Discom stated that Rs.3.03 Crs, Rs.2.86 Crs and Rs.3.56 Crs was spent during 2021-22, 2022-23 and 2023-24 respectively. This is appreciable. In this context, it's necessary to refer to the CEA (Measures for Safety and Electricity Supply) Regulations 2010. Clause 5 the said Regulations requires Discoms to appoint Safety Officers to ensure observance of Safety Measures.</p>	<p>TGSPDCL is conducting continuous sessions to educate the employees to reduce the possibility of departmental fatal/non-fatal accidents to our staff, unmanned workers and unauthorized personnel during execution of works and the usage and importance of safety equipment in the field and directed to implement safety measures strictly to avoid electrical accidents and make zero accident in our TGSPDCL. As per the directions of the Hon'ble Commission, the DISCOMs are paying the ex-gratia to the victims, however the Commission has disallowed such expenses in the DISCOMs filing. The electrical accidents occurred in TGSPDCL during the FY 2023-24, it is to be noted that out of 288 fatal accidents occurred, 276 accidents are due to the consumer faults,</p>

		<p>incautious attitude of general public only; 12 nos accidents occurred due to departmental staff even after the utmost care taken by the staff of TGSPDCL and 5 are due to the contract labor of TGSPDCL. Hence, most of the accidents occurred are due to the inattentiveness of consumers by not following the safety measures, even after so many awareness programs and advertisements conducted by TGSPDCL.</p>
	<p>Suggestions: I suggest that Hon'ble Commission may issue Directions to the Discoms to appoint Safety Officer for each Discom if not for each Operation Circle, apart from improvement of Distribution Infrastructure already directed.</p> <p>Further , the Electrical Inspectorate under Chief Electrical Inspector to Government (CEIG) is the authority to investigate Electrical Accidents and to suggest rectifications under the scheme of the Electricity Act 2003, Hon'ble Commission may please hold joint meetings with CEIG , Discoms and Energy Department and advise the government to strengthen the Electrical Inspectorate to make out an effective action plan to reduce/avoid Electrical Accidents.</p>	<p>TGSPDCL is conducting contineous sessions to educate the employees to reduce the possibility departmental fatal/non- fatal accidents to our staff, unmanned workers and unauthorized personnel during execution of works and the usage and importance of safety equipment in the field and directed to implement safety measures strictly to avoid electrical accidents and make zero accident in our TGSPDCL.</p>
	<p>Pre-paid metering: (items 14 and 15)</p> <p>Hon'bleCommission directed the Discoms to replace meters of willing consumers with pre-paid metering (item 14) and also submit report on action plan for replacement of existing meters with pre-paid metering (item 15).</p> <p>The Discom replied that it's mandatory to replace the meters of all consumers except Agricultural by March, 2025 as per the timelines given by Ministry of Power, Government of India in its letter dated 17th August, 2021. This premise of Discom is misconceived. Apparently Discom failed to note the Commission'sview in para 6.27.2 of Tariff Order for 2022-23, which is extracted hereunder:</p> <p>“6.27.2: The Commission has taken note of the submissions of Discoms and the objections received from various stakeholders on the proposal of mandatory pre-paid meters for all government services. As pointed by one of the stakeholders, Discoms have to obtain consent of consumer for availing supply through pre-paid meter. The relevant</p>	<p>As per the directions of Hon'ble Commission, the compliance report for the Fourth quarter of F.Y. 2023-24 is as follows:</p> <p>a) As per the Gazette notification by the Central Electricity Authority (CEA), Ministry of Power Dt.17.08.202, it is mandatory that all the existing meters (Other than Agriculture Consumers) are to be replaced with Prepaid Smart Meters as per the following timelines.</p> <p>Ø All electrical divisions having more than 50% consumers in urban areas with AT&amp;C losses more than 15% in FY2019-20, other electrical divisions with AT&amp;C losses more than 25% in FY 2019-20, all Govt. Offices at Block level and above, and all industrial and commercial consumers will be metered with Smart meters working in pre payment mode by December'2023.</p> <p>Ø All other areas will be metered with Smart meters working in</p>

<p>extract of the Act is as follows ”</p> <p>The Discom also stated that a draft DPR is prepared at a cost of Rs. 9,803 Crs to replace meters of 81 lakhs consumers other than Agricultural, and the same is to be approved by the Distribution Reforms Committee (DRC), State Cabinet, and final approval by the MOP, Government of India.</p> <p>Objections: Central Government has no authority under the Electricity Act to issue instructions to Discoms to replace existing meters with pre-payment metering. The Discoms are not bound by the instructions of MOP in the said letter dated 17- 8- 2021. Central Electricity Authority (CEA) has no power under the Electricity Act to insist installation of meters with pre-payment features for all consumers in the absence of any provision for mandatory pre-payment system in the Electricity Act. Pre-payment system is optional under the Electricity Act as of now. CEA Regulations are relevant for technical and operational specifications only.</p> <p>Hence the Discoms ought to have assessed the level of willingness of consumers to switch over to pre-payment system before preparing the DPR with huge investment of about Rs.10,000 Crs, which will be a colossal waste as most of the consumers may not opt for pre-payment system and it will become a wasteful investment.</p> <p>Further, in para 6.27.3 of the said Tariff Order it is stated that Discom has already installed 26,732 pre-paid meters for government services in terms of G.O. Ms. no.1 dt 31-1-2016 and MOP Lr.dt 17-8-2021.</p> <p>Discom may please be asked to inform the latest position and whether all these meters are operational and automatic disconnection is being done through meters for non-payment by due date. If they are not operational, Hon’ble Commission may please ensure that the cost of such wasteful investment is not loaded into the consumer tariffs in ARR / Tariff filings Andhra Jyothi daily news paper published are port with many details on Electrical Accidents in its edition of 2nd Oct 2024 which requires due attention of all concerned officials. The press clipping is being sent along with the covering email.</p>	<p>pre-payment mode by March’2025.</p> <p>b) The Govt. of India launched the revamped Distribution sector Scheme (RDSS) on Dt.29-07-2021, with an objective to reduce the AT&amp;C losses to 12- 15% (PAN India) and ACS-ARR gap to Zero. The Scheme consists of two components – Metering and Distribution Infrastructure Works.</p> <p>c) 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.9308.37Cr. 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, GoI.</p> <p>d) As per RDSS guidelines the GoI grant Rs.900/- per meter under metering Plan. If Prepaid Smart Metering is to taken up under RDS Scheme, an approximate cost of Rs.729 Cr., for the existing 81,00,000 nos. consumers (other than Agl. Consumers) in TGSPDCL. As per proposal of TGSPDCL in the DPR, grant of Rs.799 Cr. will be disbursed GoI Grant to the DISCOM by MoP. If TGSPDCL 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.729 Cr. e) As per the instructions of the Hon’ble Chief Minister of Telangana, a letter Dt.12.12.2023 was addressed to the Special Chief Secretary (Energy), Govt. of Telangana requesting to address a letter to the Ministry of Power, GoI regarding concurrence of GoTS for participation of TGDISCOMs in RDSS and accord approval for participation with revised DPR, as the scheme has been started in other states two years ago.</p> <p>f) The implementation of Smart Pre-payment Meters will be taken up after approval by Ministry of Power, GoI for participation of TGDISCOMs in RDSS with revised DPR. The</p>
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		smart meters enabled in prepaid mode are fully operational in TGSPDCL.
	<p>Statutory Inspection of New Lines: As per the procedure in vogue during our time, the State government authorized Transco/ Discom to conduct Statutory Inspections for their new lines. Electrical Inspectorate was inspecting H.T consumer installations and Generating Stations. I am of the view that it's desirable to entrust the duty of statutory inspections to an independent agency accredited by the Government or CEA or any other competent authority. Institutions like Institution of Engineers or Engineering Staff College of India, Hyderabad (ESCI) may be considered by the State Government.</p>	<p>A circular memo was issued by Chief engineer(Commercial) vid Circular Memo No.CE(Comml)/SE(C)/ DE(EoDB)/ ADEEoDB/ D.No.2567/24, Dt28.09.2024</p>
	<p>Periodical Inspection and Rectification of Lines Pre- monsoon inspections Normally the Discoms conduct pre-monsoon inspections as an annual feature, which mainly covers tree clearance, replacement of flashed / damaged insulators, rectifications of loose contacts at joints at cut- points etc, to avoid/ reduce interruptions of supply during ensuring monsoon season. But re-stringing of loose spans which are likely to endanger humans animals life, is not attended during these inspections.</p>	<p>The DISCOMs are regularly conducting premonsoon inspections and it is a regular practice in the TGDISCOMs every year. In consonance with the pre-monsoon inspection, the defective equipments are being replaced immediately along with tree trimming under the electrical lines and Licensees have taken up rectification of earthings, AB Switches, HG fuse sets, replacement of LT cable and fuse carriers for transformers, load balancing of transformers, rectification of oil leakages in transformers, Erection of inter poles, replacement of damaged and rusted poles, rectification of stays, replacement of spans of conductor and re stringing of spans of loose lines.</p>

	<p>Special Drive for Inspection/Rectification of Lines to prevent/reduce Electrical Accidents Hon'ble Commission may take a view whether to direct the Discoms to undertake Special Drive for Inspection and Rectification of Lines as follows from the view point of preventing accidents:</p> <p>Every Operation Circle may constitute sufficient number of teams for this purpose exclusively. These teams will conduct inspection of specified distributions in one week, note down the defects, procure necessary resources (men and materials) and take up the rectification work in the following week itself, and repeat the process as a fortnightly program. Discom officials may try to involve local people to identify the vulnerable points and motivate them to assist the Discom in taking up rectification work. Discom may sanction area wise schemes on the basis of rational norms instead of on actual survey of each distribution to avoid starting trouble for this Special Drive. This method of inspections / rectifications was implemented in composite AP in mid 1970s as per the instructions issued by the then Chief Engineer/ Operation, Sri V.S.Ganapathi Ram. It's worth trying now.</p>	<p>The TGDISCOMs have conducted power week programs in all the circles in line with the State Government Palle Pragathi and Pattana Pragathi programs. During Palle Pragathi and Pattana Pragathi programs TGDISCOMs have conducted special drive for inspection of lines/Rectification of lines and identified rusted poles, damaged poles, loose lines, and damaged conductor. Based on the identified quantities, estimates were done and rectified all the defective parts of the electrical lines in all the villages, Towns and municipalities. Further, as per the directions of Hon'ble Commission, TGDISCOMs are conducting Inspection/ Rectification of Lines and taking measures to improve poor distribution network and also submitting the reports on planning of Programs and their Progress of rectification of Poor Distribution Infrastructure to the Hon'ble Commission.</p>
	<p>Franchisee system at village level.</p> <p>Hon'ble Commission may please take a view whether to introduce Franchisee system for some vulnerable LT Distributions u/s 14 (7<sup>th</sup> proviso) for taking up maintenance functions on a pilot basis after completion of the rectifications under the proposed Special Drive or otherwise. Franchisees system was followed for some Distributions in Maharashtra a few years ago. I am not aware whether it is still being implemented successfully.</p>	<p>Initiation of Village level franchisee in TGDISCOMs will lead to financial burden of TGDISCOMs.</p>

	<p>District Level Committees          Sec166 (5) provides for constitution of District Level Committees by State government to review / coordinate certain aspects concerning electricity supply. I am not aware whether these committees were constituted and functional. Hon'ble Commission may advise the government to constitute the same for all districts including new districts and to coordinate with Discoms on the initiatives being taken to reduce/avoid Electrical Accidents, apart from the functions entrusted to the Committees u/s 166 (5) of the Electricity Act. Further, Hon'ble Commission may please examine whether there's need for Mandal Level / Village Level Committees and advise the State government suitably u/s 86 (2)(iii) of the Act.</p>	<p>Initiation of District level Committees in TGSDISCOMs will lead to financial burden of TGDISCOMs. Further, as per the directions of Hon'ble Commission, TGDISCOMs are conducting Inspection/ Rectification of Lines and taking measures to improve poor distribution network and also submitting the reports on planning of Programs and their Progress of rectification of Poor Distribution Infrastructure to the Hon'ble Commission. Hon'ble Commission will examine whether there's need for Mandal Level / Village Level Committees and advise the State government suitably u/s 86 (2)(iii) of the Act.</p>
	<p>Protection against LT line faults Long back, LT breakers with relays for tripping the line were provided at the Distribution Transformer structure for LT feeder protection against earth faults. But these were withdrawn later perhaps due to inconvenience caused to consumers' consequent to frequent trippings as the incidence of earth fault is very high in LT lines for various reasons. Hon'ble Commission may please elicit the views of Academic Institutions, Manufacturers of LT breakers and CEA for a workable solution of protection for LT lines to avoid Electrical Accidents and without causing undue inconvenience to consumers due to frequent tripping. Submitted for consideration by the Hon'ble Commission in public interest before finalizing the ARR/Tariff filings of TG Discoms.</p>	<p>It is under purview of Hon'ble Commission</p>

**7. Replies to the Objections/Suggestions raised on raised on Distribution Business ARR & Wheeling Tariff Proposals for 5th Control Period by Sri M. Thimma Reddy, Convenor, People’s Monitoring Group on Electricity Regulation, H.No. 3-4-107/1, (Plot No.39), Radha Krishna Nagar, Attapur, Hyderabad-500048**

S.No.	Summary of Objections / Suggestions	Response of the Licensee
2.1	<p>According to Section 6.2 of Regulation 2 of 2023 Multi Year Tariff (MYT) Petition for the control period FY 2024-25 to FY 2028-29 has to be filed by 31-01-2024. The present MYT petition for 5th control period was filed on 18-09-2024, a delay of more than half year. The reasons attributed by TGDISCOMs for this delay are time taken in analysing the financial impact on the TGDISCOMs due to Gruha Jyothi Scheme and ‘certain difficulties faced by the TGDISCOMs’. But the TGDISCOMs did not show anywhere in these filings the financial impact of Gruha Jyothi Scheme on the finances of TGDISCOMs. Also, nowhere ‘certain difficulties’ faced by the TGDISCOMs are elaborated. This gives the impression that TGDISCOMs are only following their nearly decade old practice of delayed filing of ARR and tariff proposals with scant regard to the Electricity Act, 2003 and Rules and Regulations framed under the said Act.</p>	<p>The Hon’ble Commission has accorded the approval to the TGDISCOMs to file the ARR and FPT for RSB filings on annual basis for the first year of 5th Control Period i.e., FY 2024-25 after careful consideration of the submissions made by the TGDISCOMs. When the Regulation No.2 of 2023 was notified on 30.12.2023, the TGDISCOMs were seeking clarifications on certain clauses of the new MYT Regulation No.2 of 2023 as there was huge impact on the financials of the DISCOMs and also there was a change in regulatory regime because of which DISCOMs needed to collect additional data for preparing the petitions. then the TGDISCOMs have initiated the process of collecting the required data from the various wings for which it took time. Subsequently, the Gruhajyothi Scheme was announced by the GoTG which further delayed the process of Filings of ARR. Meanwhile, Model code of conduct came into force, due to which the TGDISCOMs could not file the ARR filings. The DISCOMs have duly submitted the condonation of delay petition before the Hon’ble Commission stating these reasons.</p>
2.2	<p>The Commission in its Tariff Order for the FY 2023-24 at paragraphs 1.12.2 and 1.12.3 noted the following stakeholders’ observations:            “In the integrated rating score methodology introduced by Ministry of Power for assessing the health of TSDISCOMs, one of the parameters is specific disincentives which provides for Tariff Cycle Delays in terms of timely filing of the Petitions.”            “Further, this amounts to a gross violation of Hon’ble APTEL directives in O.P.No.1 of 2011 as is reproduced below: “57.... ... 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 Suo Moto proceedings for tariff determination in accordance with Section 64 of the Act read with clause 8.1(7) of the Tariff Policy.”</p>	<p align="center">No comments</p>

2.3	<p>The Commission in its Tariff Order for the FY 2023-24 at paragraph 1.12.7 stated its following view:  “The Commission in order to provide consequences of delay in filing the proposals with the Commission has notified the following amendments to the Principal Regulations relating to TSDISCOMs with stringent penalties viz., the penal fee that is attracted in case of the licensee not complying with the provisions of Regulations, the rate of return on equity shall be reduced by 0.5% per month or part thereof. Second Amendment to the Principal Regulation No.4 of 2005 viz., Terms and Conditions for Determination of Tariff for Wheeling and Retail Sale of Electricity. [Regulation No.1 of 2022]  ii) First Amendment to the Principal Regulation No.2 of 2016 viz., Fee [Regulation No.2 of 2022]”.</p>	<p>The TGDISCOMs have already paid the penalties imposed by the Hon’ble Commission towards delay in filing of ARR Petitions for Retail Supply Business And Distribution Business .</p>
2.4	<p>Such measures are not included in Regulation 2 of 2023. To discourage delay in filing ARR and tariff proposals the above measures may be reintroduced in the new MYT Regulations.</p>	
3.1	<p>TGDISCOMs estimated power requirement during the FY 2024-25 to be 85,284 MU. This is 2.55% higher than power requirement projected by TGDISCOMs during the FY 2023-24, higher than 1.32% approved by the Commission but 1.66% less than actual consumption reported by TGDISCOMs during FY 2023-24. TGDISCOMs adopted different consumption growth rates for different consumer categories to arrive at power procurement requirement during FY 2024-25. Power consumption trend during FY 2023-24 is different from previous years. In the past power requirement estimated during a year by TGDISCOMs used to be higher than that projected by the Commission and the projection by the Commission used to be higher than the actual consumption. But during the FY 2023-24 power requirement estimated by the Commission (84,156 MU) was higher than that of TGDISCOMs (83,113 MU) and in turn actual consumption reported by TGDISCOMs (86,703 MU) was higher than that estimated by the Commission. In such circumstances when the base on which growth rates are calculated is higher there is a chance that overall power requirement will be on higher side. Hence, power requirement for FY 2024-25 arrived at by TGDISCOMs needs to be closely scrutinized.</p>	<p>The actual sales varies depending on many factors like variation in monsoon, temperature and industrial policies of the Government. Hence, sales are the uncontrollable factor which is recognized by the Hon’ble Commission in its MYT Regulation no. 2 of 2023.</p> <p>The DISCOMs have forecasted sales consumption by taking historical growth rates. Any deviation in actual sales as compared to approved sales, which would result in deviation of Power Purchase cost as well as revenue would be adjusted in subsequent True-up filings by the licensee.</p>



3.2	<p>According to TGDISCOMs' estimates LT domestic consumers will be using 15,758 MU during the FY 2024-25. LT domestic consumers will account for 18.48% of electricity requirement during the ensuing year. Compared to this during the FY 2023-24 LT domestic consumers accounted for 16.62% of electricity requirement. While SPDCL assumed that electricity consumption by LT domestic consumers would increase by 5.97% during FY 2024-25 NPDCL assumed 5% increase. TGDISCOMs mentioned starting of implementation of Gruha Jyothi Scheme as one of the reasons for delay in filing the present ARR and Tariff Proposals. According to their submission, "the Licensee was analysing the financial impact in the TGDISCOMs due to Gruha Jyothi Scheme which may hinder the licensee in filing the ARR &amp; Tariff Proposals for RSB for FY 2024-25 to FY 2028-29 and Distribution Business for 5th Control Period." But in the present filings TGDISCOMs did not mention any impact of Gruha Jyothi Scheme on consumption pattern of domestic consumers. According to the Scheme rules the identified beneficiaries would become ineligible if their electricity consumption exceeds the past consumption trends or exceeds 200 units. Because of this, domestic consumers would moderate their electricity consumption. This would result in lower growth rate in electricity consumption by domestic consumers. In this background assumption of 5 to 5.97% growth rate in electricity consumption by LT domestic consumers appears to be on the higher side and the same need to be brought down.</p>	
3.3.1	<p>TGDISCOMs estimated that agriculture pump sets would be consuming 20,748 MU of electricity during the FY 2024-25 accounting for 24.33% of electricity requirement in the state. While in the case of other consumer categories CAGR was applied over consumption figures of 2023-24 in the case of LT agriculture CAGR was applied twice over the consumption figures of 2022-23. This is because according to TGDISOCMs submissions agriculture consumption during FY 2023-24 increased abnormally. According to these filings during FY 2023-24 LT agriculture services consumed 25,154 MU accounting for 28.04% of the electricity procured in the state. This was 40.67% higher than the estimates made by TGDISCOMs (17,881 MU) and 26.98% higher than the projections of the Commission (19,811 MU). TGDISCOMs did not provide any reasons for this abnormal consumption of electricity by LT agriculture services. In the absence of meters to the agriculture services in the past TGDISCOMs used ISI Methodology approved by the Commission for estimation of electricity consumption by agriculture pump sets. In the present filings NPDCL used 2.59% and SPDCL used 1.39% twice over 2022-23 consumption to arrive at LT agriculture consumption. During FY 2024-25 while NPDCL projected 3.94% increase in number of LT agriculture services</p>	<p>In FY 2023-24 the agricultural sales have increased, due to lower than expected monsoon, leading to reduction in ground water levels. Hence, the licensee has not considered growth rates based on FY 2023-24 sales as it considers that as an anomaly. Therefore, the licensee has considered 5-year CAGR and applied it twice over FY 2022-23 agricultural sales to arrive at agricultural sales projections for FY 2024-25.</p> <p>In FY 2023-24 the agricultural sales have increased, due to lower than expected monsoon, leading to reduction in ground water levels. Hence, the licensee has not considered growth rates based on FY 2023-24 sales as it considers that as an anomaly. Therefore, the licensee has considered 5-year CAGR and applied it twice over FY 2022-23 agricultural sales to arrive at agricultural sales projections for FY 2024-25.</p>

	SPDCL projected 4.38% increase. Growth rates in electricity consumption by LT agriculture services adopted by TGDISCOMs do not have any relation to increase in number of LT agriculture services during this period. Such data raises further doubts on TGDISCOMs' claims regarding electricity consumption by LT agriculture services.	
3.3.2	TGDISCOMs' computation of LT agriculture services' electricity consumption during FY 2023-24 needs to be subjected to detailed examination. According to their own submissions it was abnormal, and they did not provide any reasons for such abnormal figures. During FY 2023-24 LT agriculture services accounted for 28.04% of the electricity procured in the state. This is the highest percentage recorded in the recent history. This has different implications. On the one hand it helps to hide equally abnormally high T&D losses and on the other it imposes high subsidy burden on the state government as electricity supplied to LT agriculture services is free.	
3.3.3	One way to overcome present problems in estimation of electricity consumption by agriculture pump sets is to meter DTRs serving LT agriculture connections. But DISCOMs are avoiding this for reasons best known to them. In the past they have pointed out that financial institutions are not coming forward to finance it. Recent news reports indicate that TGSPDCL is going to spend more than Rs. 500 crore on HVDS DTRs for agriculture sector, which itself is questionable. But they are unwilling to mobilize a fraction of this to meter these DTRs. It is to be noted that metering DTRs serving agriculture connections will be cheaper than metering all agriculture services.	The DISCOMs will take-up metering of DTRs based on the guidelines and approval of RDSS scheme by MoP, GoI.
3.4	TGDISCOMs projected electricity consumption by Lift Irrigations schemes during FY 2024-25 to be 2,618 MU. Compared to this estimated electricity consumption by these Lift Irrigations schemes during FY 2023-24 was 7,594 MU. TGDISCOMs in their filings noted, "Historically, LIS sales have been very erratic. So, considered same as FY 2023-24 sales." But this is far from truth. There were reasons for this drastic decline in electricity consumption by Lift Irrigation schemes. Previously some of the pump houses of KLIS were submerged during floods and got damaged. Later, some parts of KLIS structures were damaged making them too dangerous to operate. During recent rains some pump houses of PRLIS were also got submerged, throwing them out of operation. Despite these, some parts of these Lift Irrigation components sought to be operated. TGDISCOMs need to take ground situation in to account to estimate electricity demand by these lift irrigation schemes	Historically LIS sales have been erratic. There has been a reduction in Actual LIS sales for FY 2023-24 as compared to approved .The reasons are multifold, including Monsoon seasonality etc. Hence, the licensee has considered LIS sales projections for FY 2024-25 to be same as FY 2023-24. Any deviation in actual sales as compared to approved sales, which would result in deviation of Power Purchase cost as well as revenue would be adjusted in True-up filings
3.5.1	During the FY 2024-25 T&D losses are projected to account for 11% of the electricity	The increase in agriculture sales accounts to various factors like

	<p>requirement in the state. While it will be 11.67% in the case of NPDCL it will be 10.76% in the case of SPDCL. For the FY 2018-19 the Tripartite MoU under UDAY set the AT&amp;C losses of TSNPDCL at 10.00% and TSSPDCL at 9.90%. AT&amp;C losses include collection efficiency along with T&amp;D losses. T&amp;D loss levels should have been much less than AT&amp;C losses. The T&amp;D losses projected by TGDISCOMs in the ARR for FY 2024-25 are higher than the levels stipulated for the FY 2018-19 under the Tripartite UDAY - MoU. What is more according to their present filings T&amp;D losses during FY 2023-24 stood at 14.14% of the power supplied in the state. If we take in to account 'abnormal' electricity consumption by LT agriculture services during FY 2023-24 actual T&amp;D losses should have been much higher. It is high time the Commission takes a serious view of this phenomenon. Over the last few years TGDISCOMs have spent thousands of crores on T&amp;D network in the name of improving quality of supply and bringing down T&amp;D losses. But neither of them was realised even when consumers were subjected to higher tariffs year after year.</p>	<p>increase in ground water level, monsoon and crop pattern etc., The T&amp;D loss percentages has been considered as per the approved Resource Plan and Business Plan for 5th Control Period for FY 2024-25 to FY 2028-29.</p>
3.5.2	<p>When the estimated T&amp;D losses are brought down to lower levels the quantum of power to be procured will also come down reducing tariff burden on the consumers.</p>	<p>The DISCOM is putting all efforts to reduce its losses and reach the targets set by the Honble Commission. It is expected to reduce the losses further by reduction of technical and commercial losses by vigorously conducting 11kV feeder wise energy audits and by taking necessary measures for reduction of losses in the company.</p>
3.6	<p>According to Demand Side Management Regulation of 2020 (Regulation 1 of 2020) Distribution Licensees shall submit a DSM plan to the Commission six months before the MYT control period and implement the same. DSM interventions are expected to bring down overall electricity consumption. We would like to know whether TGDISCOMs submitted DSM plans for the MYT control period under examination. If yes, whether it is taken in to account while estimating power procurement requirement during the FY 2024-25.</p>	<p>TGDISCOMs are planning to implement DSM plans by installing smart meters at consumer, DT and feeder level subject to approval of RDSS Scheme by MoP, GoI.</p>

4.1.1	<p>n the case of power procurement from Marwa thermal power plant of Chhattisgarh State Power Distribution Company Limited (CSPDCL) TGDISCOMs have submitted as follows: “A judicial committee has been appointed to investigate power procurement from CSPDCL station. Hence, Power has not been scheduled from CSPDCL plant in the current control period.” The terms of reference of the Commission of Inquiry include examination of power procurement from BTPS and YTPS of TGGENCO along with CSPDCL. If power has not been scheduled from CSPDCL due to judicial inquiry then the same shall also apply to BTPS and YTPS of TGGENCO.</p>	<p>Energy dispatch from Chhattisgarh State Power Distribution Company Limited (CSPDCL) has been suspended due to ongoing disputes from FY 2022-23 and the Licensee is currently not scheduling any dispatch from CSPDCL. Further, energy availability from BTPS has been considered as Licensee is continuing to procure power and the same has been indicated in the approved Resource Plan. Energy availability from YTPS is expected to start from December 2024 (2 units of 800 MW) and therefore the same has been considered.</p>
4.1.2	<p>TGDISCOMs’ ARR filings for the FY 2024-25 show that power generation from YTPS will commence from December 2024. But press reports mention Deputy Chief Minister directing TGGENCO officials to start power generation from this plant at least by next March. (The Hindu, 12-09-2024) Among other things YTPS is reported to be facing staff crunch. The Commission is requested to direct TGDISCOMs to come out with the actual situation at YTPS</p>	<p>While filing ARR for the FY 2024-25, the TGDISCOMs have considered the information received from the TGGENCO that power generation from YTPS will commence from December 2024. Now, it is under Commission purview to consider the appropriate Generation.</p>
4.2.1	<p>According to TGDISCOMs’ ARR and Tariff filings for FY 2024-25 electricity availability will be 1,08,651 MU and dispatch will be 85,284 MU leaving a surplus of 23,367 MU. Surplus power accounts for 21.51% of the power available to the state during FY 2024-25.</p>	<p>The surplus power shown due to consideration of NAAAF &amp; NAPLF of the power plants having long term PPA’s and upcoming power plants. However, there is likely variation of availabilities and PLFs of the Plants.</p>
4.2.2	<p>Power available to TGDISCOMs during FY 2024-25 includes short term procurement of 4,985 MU. The related question is – when 23,367 MU of surplus power is available is there need to go for short term purchase of 4,985 MU at a higher price? As TGDISCOMs are facing surplus power situation during FY 2024-25 we request the Commission not to allow short term purchases</p>	<p>The short term power procurement has been determined on the basis of Hourly demand and available energy source to meet that demand for each hour. In peak hours and peak month the available dispatch from tied up sources is not enough to meet demand (in MW) and hence market purchase are considered to meet demand (in MW). Similarly during non-peak months, available dispatch from tied-up sources is higher than demand and the state will have surplus energy.</p>
4.2.3	<p>Power availability from Neyveli new unit I and II was included during FYs 2022-23 and 2023-24 but the same is not included under power availability during FY 2024-25. To this extent power availability during FY 2024-25 may have been under estimated. The same needs to be examined.</p>	<p>The energy availability for the station has not been projected in the Approved Resource Plan for the 5th Control Period. Further, the share of TSDISCOMs from Neyveli new unit I and II was relinquished vide letter dated 29.03.2022 which was accepted by M/s NLC. Hence, the same has not been considered.</p>

4.3.1	<p>TGDISCOMs propose to spend Rs. 42,702 crores on power procurement during the FY 2024-25. This accounts for 73.81% of aggregate revenue requirement (ARR). Avenues shall be explored to bring down power procurement cost to reduce tariff burden on the consumers as well as budgetary support from the state government</p>	<p>The current power purchase cost has been determined based on existing PPAs of TGDISCOM with the various generators and the required dispatch from the various stations based on the variable demand. The Licensee shall strive to optimize and reduce power purchase cost on a best effort basis.</p>
4.3.2	<p>The present filings show that during FY 2024-25 TGDISCOMs would be selling 9,450 MU (NPDCL = 2,783 MU and SPDCL = 6,667 MU) of surplus power and would be receiving revenue of Rs. 2,170 crores. Average revenue from sale of this surplus power will be Rs. 2.30 per unit. This revenue from sale of surplus power is shown to bring down total power purchase costs. But this quantum of surplus power is not shown under power requirement/procurement. This surplus power to be sold in the market in the first place it needs to be purchased by DISCOMs. But its power purchase cost is not included under total power purchase cost. To that extent power purchase cost is under estimated. Consequently, ARR as well as deficit to be covered are also under estimated. Average revenue from sale of this surplus power is lower than unit variable cost from all sources. This implies that this surplus power will be sold at loss. This further implies that this whole exercise of sale of surplus power instead of reducing power purchase cost will in fact increase it. The Commission is requested to scrutinise TGDISCOMs' claims regarding sale of surplus power during the FY 2024-25</p>	<p>The revenue indicated as the sale of surplus power is net of the power purchase cost and is the difference between the average market rate and the average variable cost of the respective stations. Hence, the value indicated is the income of DISCOMs from the sale of surplus power net of power purchase cost and therefore, the same can be considered as included in the ARR.</p>
4.3.3	<p>The filings for the FY 2023-24 had shown a surplus of more than 13,000 MU. But the present filings show that surplus power during the FY 2023-24 had come down to little more than 1,000 MU. At the same time 16,293 MU were procured through short term purchases during FY 2023-24 at a cost of Rs. 8,566 crores. Average cost of this short-term power procurement was Rs. 5.26 per unit. During the same time thermal power units of TGGENCO operated at below their threshold PLF. During FY 2023-24 TGGENCO units operated at PLF of 50 to 69% though threshold PLF is 85%. During this period power from some of CGS units was also procured at below their threshold PLF. Variable cost of these thermal power plants was much less than average cost at which short term power was procured. This shows that during FY 2023-24 costly power was procured even when cheaper sources were available resulting avoidable tariff burden on consumers in the state and subsidy burden on the state government. In this background we request the Commission to scrutinise TGDISCOMs' power procurement during FY 2023-24.</p>	<p>The short term power procurement has been determined on the basis of Hourly demand and available energy source to meet that demand for each hour. In peak hours and peak month the available dispatch from tied up sources is not enough to meet demand (in MW) and hence market purchase are considered to meet demand (in MW). Similarly during non-peak months, available dispatch from tied-up sources is higher than demand and the state will have Surplus energy.</p>

4.3.4	<p>The Telangana State Power Sector White Paper brought out by the State Government of Telangana has highlighted high capital costs of BTPS and YTPS. According to this White Paper capital cost of BTPS is Rs. 9.74 crore per MW while its planned capital cost was Rs. 6.75 crore per MW. Capital cost of YTPS is Rs. 8.64 crore per MW. Compared to this, according to this White Paper, capital cost of NTPC's new plant coming up at Ramagundam specifically meant for Telangana is Rs. 7.63 Crore per MW. High capital cost of these two plants is because of inordinate delay in and inefficient execution of these plants. Electricity consumers in the state shall not be burdened with inefficient execution and operation of these plants and we request the Commission to review capital costs of these power plants.</p>	<p>The DISCOM will abide the directions of the Hon'ble Commission.</p>
4.3.5	<p>BTPS is reported to be facing serious problems in operation and maintenance of the plant due to problems in quality of machinery supplied to it by BHEL. This machinery was actually meant for a private sector company's power plant to come up in Maharashtra. As the private company failed to set up the plant the machinery was lying idle with BHEL. This machinery lying idle was used to set up BTPS. Once brought in to operation the BTPS units are facing severe problems. The BTPS units are reported to be facing so many problems similar to that of a plant that has been in operation for 10 to 15 years. In the background of the problems faced in operating the BTPS units and the questionable quality of machinery (for all practical purposes second hand machinery) supplied by BHEL its capital cost needs to be reevaluated</p>	<p>The DISCOM will abide the directions of the Hon'ble Commission.</p>
4.3.6	<p>Present filings show that Variable charges for YTPS during FY 2024-25 will be Rs. 2.54 per unit. This is the lowest variable cost among all thermal power plants of TGGENCO. The Telangana State Power Sector White Paper brought out by the State Government of Telangana pointed out that as the plant is located far away from coal mines of SCCL transport component will add to the coal cost leading to higher variable cost. It was estimated that because of this non-pit head status of this plant variable cost of power from this plant will be higher by more than one rupee per unit. Contrary to this the present filings show that variable cost of this plant will be lower than pit head power plants. While lower costs need to be welcomed as it is against the trend the same needs to be clarified</p>	<p>The variable charges for YTPS has been considered as per the Detailed Project Report (DPR). The DISCOM will abide the directions of the Hon'ble Commission.</p>

4.3.7	<p>According to the present filings variable cost of power from TGGENCO's Ramagundam – B during the FY 2024-25 will be Rs. 4.63 per unit. This is highest among all thermal power plants of TGGENCO. As it is in close proximity of coal mines its variable cost is expected to be lower. During the same period variable cost of NTPC's Ramagundam units will be Rs. 3.82 per unit. Given this experience variable cost of TGGENCO's Ramagundam – B plant has to be brought down.</p>	<p>The variable cost for TGGENCO's Ramagundam-B plant has been considered as per the TGGENCO ARR Filing. The DISCOM will abide the directions of the Hon'ble Commission.</p>
5.1.1	<p>According to NPDCL filings of FY 2024-25 total arrears of Rs. 50,000 and more pending for six months as on 31-03-2024 are Rs. 11, 772.72 crore. These arrears are equal to 59.66% of ARR of FY 2023-24. According to SPDCL filings of FY 2024- 25 total arrears of Rs. 50,000 and more pending for six months as on 30-09-2023 are Rs. 12, 917.60 crore. These arrears are equal to 29.81% of ARR of FY 2023-24. Both the DISCOMs are facing arrears of Rs. 24,690 crores. Substantial portion of these arrears have to come from state government departments. (While SPDCL mentioned the arrears due from Government departments NPDCL did not show these details). According to SPDCL submission arrears due from state government departments stand at Rs. 8,057.85 crore accounting for 62.38% of the arrears. Situation may be the same or even worse in the case of NPDCL. According to Section 1.2 i) of UDAY – MoU all outstanding dues from the government departments to DISCOMs for supply of electricity shall be paid by 31-03-2017. Since then, arrears from state government departments in fact have increased.</p>	<p>The DISCOMs are regularly corresponding with the heads of the concerned departments for payment of arrears by addressing D.O letters.</p>
5.1.2	<p>If the arrears below Rs. 50,000 are also taken in to account total arrears due to TGDISCOMs will be much higher. Because of these mounting arrears TGDISCOMs are forced in to heavy debt burden and it is one of the reasons for losses incurred by the TGDISCOMs. We request the Commission to advise the State Government to release arrears pending from state government departments in a time bound manner. We also request the Commission to direct DISCOMs to take effective steps to bring down arrears from other consumers.</p>	<p>The DISCOM will abide the directions of the Hon'ble Commission.</p>

5.2.1	<p>TGSPDCL paid compensation to consumers in 10 cases for deficiency of services as per Regulations of the Commission. Total compensation paid was Rs. 18,000. TGSPDCL did not mention the number of cases in which compensation was paid to consumers for deficiency of service. It only mentioned the amount of compensation paid. It paid Rs. 1,36,487 towards compensation to consumers. The number of cases in which compensation was paid were too few to reflect reality. Consumers in the state are being made to run from pillar to post to get the works done. For all practical purposes Standards of Performance (SoP) do not exist. They exist only on paper. We request the Commission to institute a third party assessment of TGDISCOMs' claims on SoP</p>	<p>The TGSPDCL is achieving the SOP and communicating the reports to the Hon'ble Commission as per the schedule vide Regulation no.5 of 2016.</p>
5.2.2	<p>We would like to know the number of employees of the Licensees caught red handed by Anti Corruption Bureau (ACB) of Telangana Police during the 4th Control Period. What was the action taken by TGDISCOMs against them? How many of them were reinstated?</p>	<p>U.O addressed to CE(HRD)</p>
5.3.1	<p>During the FY 2023-24 the number fatal accidents involving humans stood at 644. This is one the highest number of fatal accidents in the recent past. This shows that there was not much improvement in safety measures. Unacceptable high fatal accidents are taking place in spite of huge investments in men and materials to strengthen T&amp;D network. SPDCL filings show that out of 288 fatal accidents general public were involved in 276 fatal accidents.</p>	<p>As per the Directions issued in RST order for F.Y.2023-24, it is to inform that, instructions were issued to the concerned officers of TGSPDCL to conduct awareness programs among the consumers by observing Electrical Safety Week at all the offices of TGSPDCL and also some important locations in the towns and villages including the 33/11 kV substations to create Electrical Safety Awareness among Public, Staff and Contract workers by conducting seminars, workshops and awareness Programmes to minimize electrical accidents.</p> <ul style="list-style-type: none"> <li>Ø Exhibited electricity safety slogans</li> <li>Ø Conducted workshops and seminars</li> <li>Ø Displayed of banners and hoardings in the public places and substations.</li> <li>Ø Wide publicity given to all the consumers by Ton-Toming announcements on the safety aspects in auto every month along with the Revenue collection.</li> </ul>



5.3.2	<p>According to NPDCL's submission on root cause of accidents in 82 cases victims came in contact with live wires, in 52 cases victims died during repairing agriculture motors/service wires, in 14 cases victims were replacing DTR fuses, and in 10 cases victims touched snapped conductors. These instances show that there were shortcomings in operation of the DISCOM. In 120 cases victims died due to faulty domestic wiring or appliances. This indicates the need to create awareness among the general public on safety measures. SPDCL did not provide similar information. It mentioned that the relevant information was provided to the Commission. We request the Commission to direct SPDCL to make the information on root cause of accidents public.</p>	<p>The Details of electrical accidents occurred during previous year is specified in Format - 2 of Performance reports. The DISCOM is communicating the reports to the Hon'ble Commission regularly and are made available in the TGERC website.</p>
5.3.3	<p>The information provided by TSDISOMs on electrical accidents show that most of the fatal accidents took place in circles with predominantly rural services. These accidents are low in urban circles. This implies that the rural consumers are not receiving quality service. Every step shall be taken to correct this anomaly.</p>	<p>Most of the electrical accidents are predominant in rural areas because of lack of awareness in the public. For which, the TGDISCOMs are conducting Electrical safety week in urban and rural areas for creating awareness in the consumers.</p>
5.3.4	<p>Though the Commission is directing the DISCOMs to take preventive steps to avoid the accidents the DISCOMs appear to be not responsive.</p>	<p>The TGDISCOMs are conducting awareness programs among the consumers regarding safety standards, use of electricity TO AVOID ELECTRICAL ACCIDENTS and communicated the reports to the Hon'ble Commission regularly.</p>

**8. Replies to the Objections/Suggestions raised on raised on Distribution Business ARR & Wheeling Tariff Proposals for 5th Control Period by G.R. Karunakar, Plot No.56, Lakshmi Mega Township, Ragannaguda, Abdullahpurmet, RR Dist, Hyderabad- 501510**

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	At the outset, condonation request itself should not be considered. Paucity of time for collecting necessary information from their own departments and preparing ARR is their internal administrative inefficiency. Model code of conduct due to general elections has nothing to do with their internal official/homework.	There was a change in regulatory regime because of which DISCOMs needed to collect additional data for preparing the petitions. Moreover, due to the enforcement of model code of conduct, the DISCOMs could not file the petition. The DISCOMs have duly submitted the condonation of delay petition before the Hon'ble Commission stating these reasons
2	What is the cost of power procurement from Hyder/Thermal stations within the state? What is the cost of power purchase from other state-owned power stations and NTP? Why is there a difference? Are there any plans to make our state self-sufficient?	For FY 2024-25, requirement of 28,577 MU from TGGENCO Thermal stations at an average cost of INR 5.59 / unit, and requirement of 5,744 MU from TGGENCO Hydel stations at an average cost of INR 2.79 / unit is projected for Telangana State. Further, requirement of 32,520 MU at an average cost of INR 5.43 / unit is also projected for other thermal stations including Central Generating Stations, Sembcorp, Singareni, etc. The cost of power purchase has been determined based on the Fixed Cost and Variable Cost of the respective plants which is expected to vary depending on multitude of factors. The Licensee also strives to ensure that maximum power is procured from within the state on a best effort basis.
3	What are the reasons for failure of Sri Srisailam Hydal power generating stations? What is the cost of repairing them? When are they going to be re-commissioned?	Under the purview of TG GENCO
4	What is the highest and lowest cost of procurement of solar power till date?	The cost of procurement of solar power ranges from INR 2.4 / unit to INR 10.4 / unit
5	What is the extent of land (forest or other) procured to erect solar power generating stations?	Not under the purview of DISCOM

6	What is the status of implementation of PM-KUSUM schemes A, B, and C?	Invitation of tenders is under process
7	How many houses/consumers have adopted “Surya ghar”?	Around 2,000 consumers have adopted “Surya ghar”
8	What are the distribution losses in different circles?	Urban circles have distribution losses of 4.8% and rural circles have distribution losses of 7.5%.
9	What are the number of illegal/unauthorized domestic, industrial, and commercial power connections in various circles, and what is the action mooted? Is there any plan/programme for regularization of them?	Theft cases are booked for all illegal and tampered connections for different types of consumers. Stringent action taken such as levying penalty and arresting of consumers.
10	What are the dues from central and state government offices for consuming power?	The dues from State Government Offices is approximately INR 50 Crores.
11	What and how much power is consumed by various departments and sections of the society who are provided power at subsidized rates and free power? What is the loss/burden? Is the state government compensating the same, and to what extent?	Category wise energy consumption is available in the petition filed by the licensee. The Government of Telangana is providing subsidy to agricultural and domestic consumers every year. Moreover, industrial and commercial consumers also cross subsidize domestic and agricultural consumers to some extent.
12	Details of subsidized power tariffs to various categories of consumers in other states.	The details of power tariffs of different States can be downloaded from the websites of respective State Distribution companies or State Electricity Regulatory Commission

**Sl. No. 9 to 22 and 33 - 56. 5వ నియంత్రణ కాలము యొక్క ఆర్థిక సంవత్సరాలకు (2024-25 నుండి 2028-29వరకు) రిలైల్ సప్లయ వ్యాపారము కోసము సమగ్ర ఆదాయ ఆవశ్యకత మరియు 2024-25 ఆర్థిక సంవత్సరానికి రిలైల్ సప్లయ వ్యాపారానికి, ధరల ప్రతిపాదనలు & ఓకరాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనలపై సివిభాస్కర్ రావు మరియు మరో 14 మందిగారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు / సూచనలు	టీజీఎస్పీడిసిఎల్ - సమాధానాలు
1.	తెలంగాణ రాష్ట్ర విద్యుత్ నియంత్రణ మండలి భవనాన్ని నిర్మించి మీ సేవలు విస్తృతం చేయడానికి మీరు స్వంత భవనం లో స్థిరమైనందుకు మిమ్మల్ని అభినందిస్తున్నాము.	—
2.	ఈ భవనము కోసం ఫలం ఇచ్చిన జెన్కోను, సహకరించిన GHMC, బలంగా సుందరంగా నిర్మించిన కాంట్ రాక్షర్లు కు కృతజ్ఞతలు.	—
3.	ERC లో నూతనం గా నియమించబడ్డ సిబ్బందికి శుభాభినందనలు తెలుపుతూ సత్వరమే సేవలు అందించుటకు ప్రక్షితులుగా కావాలని కోరుతున్నాము.	—
4.	జన్ ఉద్యోగుల జీతభత్యాలను పెంచాలి. సీనియర్ ఉద్యోగస్తులకు ఉన్న జీతభత్యాలపై చరమ (సీలింగ్) అవధి ఉండాలి.	వేతన సవరణ చర్చల కమిటీ'2022 నివేదిక ప్రకారం మరియు తెలంగాణ పవర్ యుటిలిటీల యాజమాన్యాలు, తెలంగాణ పవర్ యుటిలిటీలలో పేరాతినిధ్యం వహిస్తున్న యూనియన్ల మధ్య కుదిరిన సెటిల్మెంట్ మెమోరాండం ప్రకారం హైదరాబాద్, కార్మిక జాయింట్ కమిషనర్ ( జంట నగరాలు) పారిశ్రామిక వివాదాల చట్టం, 1947 మరియు తెలంగాణ రాష్ట్ర పారిశ్రామిక వివాదాల నియమాలు, 1958 యొక్క నిబంధనల ప్రకారం ఉద్యోగులు మరియు చేతివృత్తుల వారి జీతాలు మరియు అలవెన్సులు పెంచబడ్డాయి
5.	రైతులు నూతన (ట్రాన్స్ఫార్మర్లు) కనెక్షన్ల కోసం డీడీలు తీసినప్పుడు ORC రూపంలో వేలు లక్షలు కట్టవలసిందిగా నోటీసులు పంపుతున్నారు. దానివల్ల రైతులకు వ్యవసాయ రంగంలో తొలి అప్పు విద్యుత్ కోసమే	డిపార్ట్మెంట్ నిబంధనల ప్రకారం ఈ క్రింది విధంగా అంచనా వ్యయం మించి ఉంటే వినియోగదారుడు ORC రూపంలో

	<p>అవుతుంది. సామాగ్రి కూలీల వ్యయం పెరిగినందువల్ల రైతులు చెల్లించే డిడి కి రెట్టింపు చేసి కనీసము మూడు LTపోల్ల దూరానికి అదనపు ఛార్జీలు లేకుండా కనెక్షన్ ఇవ్వాలి.</p>	<p>ఛార్జీలను చెల్లించాలి:</p> <p>i) అంచనా లో HT లైన్, LT లైన్ &amp; DTR ఉంటే, వ్యయం ప్రతి సర్వీస్ కు రూ.90,000/- వరకు <b>టీజీఎస్పీడిసిఎల్</b> భరిస్తుంది.</p> <p>ii) అంచనా లో LT లైన్ మాత్రమే ఉంటే, వ్యయం ప్రతి సర్వీస్ కు రూ.45,000/- వరకు <b>టీజీఎస్పీడిసిఎల్</b> భరిస్తుంది.</p> <p>పై సూచనలు అన్ని SE/OP లకు సూచనల రూపం లో జారీ చేయబడ్డాయి.</p>
<p>6.</p>	<p>DTR దిమ్మెలు రైతులే నిర్మించుకుంటున్నారు దానిని ఎస్టిమేషన్లో నుండి తీసివేయాలి. దిమ్మె కోసం కేటాయించిన డబ్బులు అవసరమైనచో ఇతర సామాగ్రి కోసం ఉపయోగించాలి.</p>	<p>DTR దిమ్మెలు డిపార్టుమెంటు ద్వారా నిర్మించడం జరుగుచున్నది.</p>
<p>7.</p>	<p>స్పార్కర్ నుండి రైతు కనెక్షన్ వరకు గల ప్రక్రియలో మేము ఏమి చేయాలి? డిస్కం ఏం చేస్తుంది?</p>	<p>వ్యవసాయ సర్వీస్ లను విడుదల చేసే విధానం:</p> <ol style="list-style-type: none"> <li>i. వినియోగదారుడు మీ-సేవ/టీజీఎస్పీడిసిఎల్ పోర్టల్ లో వారికి అవసరమైన లోడ్ కు అవసరమైన ఛార్జీలను చెల్లించి దరఖాస్తులను నమోదు చేసుకోవాలి.</li> <li>ii. మీ-సేవ/టీజీఎస్పీడిసిఎల్ పోర్టల్ లో దరఖాస్తును నమోదు చేసిన తర్వాత, దరఖాస్తుతోపాటు పత్రాలు సంబంధిత అసిస్టెంట్ డివిజనల్ ఇంజనీర్ గాగిన్ కి పరిశీలన మరియు సర్వీస్ కనెక్షన్ కోసం పంపబడతాయి.</li> <li>iii. అసిస్టెంట్ డివిజనల్ ఇంజనీర్/ఆపరేషన్ అదే దరఖాస్తు ను సంబంధిత సెక్షన్ ఆఫీస్ లాగిన్ లకు పత్రాలతో పాటు పంపిస్తారు.</li> <li>iv. సెక్షన్ ఆఫీసర్ సైట్ లోకేషన్ తో పాటు ఆధార్ కార్డ్, పట్టా పాస్ బుక్, సి-ఫారమ్ మొదలైన అన్ని పత్రాలను ధృవీకరిస్తారు.</li> <li>v. వినియోగదారుకు ఎటువంటి మౌలిక సదుపాయాలు</li> </ol>

		<p>అవసరం లేకుంటే, సక్రమంగా సర్వీస్ నంబర్ను కేటాయించి కనెక్షన్ ఇవ్వబడుతుంది మరియు EBSలో అప్లోడ్ చేయడానికి నెలవారీ సర్వీస్ కనెక్షన్ రిలీజ్ రిటర్న్ లో EROకి పంపబడుతుంది.</p> <p>vi. వినియోగదారునికి మౌలిక సదుపాయాలు (LT లైన్, 11KV లైన్ &amp; DTR మొదలైనవి) అవసరమైతే, ఈ అప్లికేషన్ ఫస్ట్ ఇన్ ఫస్ట్ అవుట్లో అంచనాను రూపొందించడానికి SAPకి పోస్ట్ చేయబడుతుంది (అంటే, సెక్షన్ స్థాయిలో సీనియారిటీ జాబితాలో జోడించబడుతుంది).</p> <p>vii. సీనియారిటీ జాబితా ప్రకారం అంచనా డబ్ల్యుబిఎస్ నంబర్ సృష్టించబడుతుంది మరియు కాంపిటెంట్ అథారిటీల ద్వారా మంజూరు కోసం పంపబడుతుంది.</p> <p>viii. అధికార ప్రతినిధి బృందం ప్రకారం అంచనా మంజూరు చేయబడుతుంది మరియు అంచనా వ్యయం మించి ఉంటే ORC చెల్లింపు కోసం డిమాండ్ నోటీసు వినియోగదారునికి జారీ చేయబడుతుంది.</p> <ul style="list-style-type: none"> <li>➤ అంచనా లో HT లైన్, LT లైన్ &amp; DTR ఉంటే, వ్యయం ప్రతి సర్వీస్ కు రూ.90,000/- టీజీఎస్పీడిసిఎల్ భరిస్తుంది.</li> <li>➤ అంచనా లో LT లైన్ మాత్రమే ఉంటే, వ్యయం ప్రతి సర్వీస్ కు రూ.45,000/- టీజీఎస్పీడిసిఎల్ భరిస్తుంది.</li> </ul> <p>ix. అంచనాను మంజూరు చేసిన తర్వాత, పద్ధతి ప్రకారం కాంట్రాక్టర్ ఒప్పందాన్ని తీసుకోవటం జరుగుతుంది.</p> <p>x. డివిజన్ కార్యాలయం నుండి ఒప్పందాన్ని అందించిన తర్వాత AE/ఆపరేషన్ ద్వారా వర్క్ ఆర్డర్ తీసుకోబడుతుంది.</p>
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		<ul style="list-style-type: none"> <li>xi. వర్క్ ఆర్డర్ను విడుదల చేసిన తర్వాత, స్టోర్ల నుండి మెటీరియల్ డౌరా చేయబడుతుంది మరియు పని అమలు చేయబడుతుంది.</li> <li>xii. వినియోగదారుడువ్యవసాయమోటార్సామర్థ్యానికిసరిప డుకెపాసిటర్ను అమర్చుకోవాలి.</li> <li>xiii. తర్వాత సర్వీస్ కనెక్షన్కునంబర్ను కేటాయించి, EBSలో అప్లోడ్ చేయడానికి నెలవారీ సర్వీస్ కనెక్షన్ రిలీజ్ రిటర్న్ లో EROకి పంపబడుతుంది.</li> </ul>
<p><b>8.</b></p>	<p>Toll Free నెంబర్లు 1800 425 3600, 1800 425 0028 లను పునరుద్ధరించాలి. Toll Free నెంబర్లు క్రియాత్మకం (active) చేస్తూ ప్రచారం చేయాలి. ప్రతి టీరాన్సాన్సార్గర్ గద్దె పై ప్రధాన కూడల్లో ప్రజలు రద్దీగా ఉండే చోట్లలో టోల్ ఫ్రీ నెంబర్లు రాయాలి. టోల్ ఫ్రీ నెంబర్ కు ఫోన్ చేస్తే మీ AE గారికి చెప్పారా అని అడుగుతున్నారు.కాబట్టి ఇలా ఆడగకుండా బాధ్యతను వారికి అర్థం చేయించండి. విద్యుత్తుకు సంబంధించిన ప్రతి కంపైంట్ టోల్ ఫ్రీ ద్వారానే జరిగే విధంగా చర్యలు చేపట్టి పని పూర్తి అయ్యేవరకు పర్యవేక్షణ చేస్తూ సంబంధిత అధికారులను సమాయత్తం చేయాలి.</p>	<ol style="list-style-type: none"> <li>1. టోల్ ఫ్రీ నంబర్స్ 1800 425 0028 &amp; 1912 వాడకంలో ఉన్నాయి.</li> <li>2. అన్ని విద్యుత్ కార్యాలయాల్లో, సబ్ స్టేషన్ లలో, గోరామ పంచాయతీ కార్యాలయాల వద్ద మరియు టీరాన్సాన్సార్గర్ గద్దెలపై టోల్ ఫ్రీ నంబర్లు వ్రాయబడ్డాయి.</li> <li>3. వినియోగదారుడు టోల్ ఫ్రీ నెంబర్ కు ఫోన్ చేస్తే కాల్ సెంటర్ ఏజెంట్స్ తన ఫిర్యాదునమోదు చేసుకొని ఆ సమాచారాన్ని సంబంధిత అధికారికి తెలియచేస్తారు.</li> <li>4. విద్యుత్తుకు సంబంధించిన ప్రతి ఫిర్యాదు టోల్ ఫ్రీ నెంబర్ ద్వారా నమోదు చేసుకొని అది పూర్తి అయ్యే వరకు సంబంధిత అధికారులతో విచారణ చేయడం జరుగుతుంది.</li> <li>5. వినియోగదారుల ఫిర్యాదులను ఇబ్బంది లేకుండా పరిష్కరించేందుకు, టీజీఎస్పీడిసిఎల్అదనంగా 15 మంది సిబ్బందిని CCC (కమాండ్ కంట్రోల్ సెంటర్) సెంటర్లో పని చేయడానికి కేటాయించింది.</li> <li>6. CCC సిబ్బంది, క్షేత్రస్థాయి సిబ్బంది సమన్వయంతో వినియోగదారుల ఫిర్యాదులను సమర్థవంతంగా పరిష్కరించటం జరుగుతుంది.</li> </ol>
<p><b>9.</b></p>	<p>బైల్ అప్లికేషన్ App ద్వారా ఏ విధంగా సమస్యలను పరిష్కరించుకోవచ్చో విరివిగా ప్రచారం చేయాలి. TGSPDCL లో కూడా Mobile App ను ప్రవేశపెట్టాలి.</p>	<p>వినియోగదారుల ఫిర్యాదులను నమోదు చేయడానికి టీజీఎస్పీడిసిఎల్మొబైల్ యాప్ను అభివృద్ధి చేసింది. ఈ యాప్ను గూగుల్ ప్లే స్టోర్ నుండి డౌన్లోడ్ చేసుకోవచ్చు.</p>

<p><b>10.</b></p>	<p>స్పార్కర్లు, స్తంభాలు మరియు ఇతర సామాగ్రి రైతుల ద్వారా ట్రాక్టర్లలో తరలింప చేస్తున్నారు. ఈ పని చేస్తూ ఎందరో షరాణాలు పోగొట్టుకుంటున్నారు. కాంట్రాక్టర్ల ద్వారా విద్యుత్ సిబ్బంది ద్వారా జరగవలసిన పనులను రైతులతో చేయించి, రైతుల మరణానికి కారకులైన వారు హంతకులే రైతుల యొక్క అవసరాలు, అమాయకత్వాన్ని వాడుకొని ప్రమాదాలకు గురిచేసి హత్య చేస్తున్నారు. ఫీజులు పోయినప్పుడు సకాలంలో సిబ్బంది స్పందించ నందువల్ల పంట నష్టం జరుగుతుందనే ఆవేదనతో ఫీజుల మరమ్మత్తు చేస్తూ షరాణాలు పోగొట్టుకుంటున్న వారిని కూడా హత్యలే. వీటిని రైతుల యొక్క తొందరపాటు మరణాలుగా భావించటం కడు సోచనీయం. దానిని నివారించాలి పోల్ల రవాణా చేయించే అధికారులపై కాంట్రాక్టర్ల పై క్రిమినల్ కేసులు పెట్టాలి. ఆపరేషన్ సిబ్బందికి బిల్ కలెక్షన్ బాధ్యతలు అప్పగించి పని భారం పెంచరాదు.</p>	<p>టీజీఎస్సీడిసిఎల్సిబ్బంది మాత్రమే లైన్లు మరియు డీటీఆర్ల మరమ్మత్తుల కోసం పనిని చేపడతారు కాని రైతులు చేయకూడదు అనే ఈ సందేశం అన్ని రకాల సమాచార మాధ్యమాల ద్వారా విస్తృతంగా ప్రచారం చేయబడుచున్నది.</p> <p>పోల్స్, డీటీఆర్లను డిపార్ట్మెంట్ మాత్రమే రవాణా చేస్తోంది.</p> <p>ఓఓఎం సిబ్బందికి నిర్దేశిత నిబంధనల ప్రకారం మాత్రమే పనులు అప్పగిస్తున్నారు.</p>
<p><b>11.</b></p>	<p>ల ట్రాన్స్ఫార్మర్లు కాలిపోయినప్పుడు విద్యుత్ శాఖ వారే తమ వాహనాలలో తెచ్చి బిగించాలి. ఎట్టి పరిస్థితులలో కూడా రైతులను ముట్టుకోనియ్య రాదు. 60 శాతం DTRలు రవాణా చేసామని ARR (NPDCL ARR Page No 93) లో తెలిపారు. ఇవి అన్నీ పట్టణ - నగర షరాంతాలవే, గ్రామీణDTRలు రవాణా చేయటం లేదు.</p>	<p>విషయం NPDCLకి సంబంధించినది కావున కామెంట్స్ లేవు</p>
<p><b>12.</b></p>	<p>జు లైన్లను సరి చేస్తూ కాలం చెల్లిన పాత సామాగ్రిని తొలగించి కొత్తవి బిగించాలి.</p>	<p>ఇది నిరంతర ప్రక్రియ మరియు డిపార్ట్మెంట్ ఈ పనిని క్రమం తప్పకుండా నిర్వహిస్తుంది. ఇటీవల 33,739 లొకేషన్లలో లూజ్ లైన్లు సరిచేయబడినవి మరియు గుర్తించబడిన ప్రమదహిత పరికరాలు రిఫ్లేస్మెంట్ చేయబడ్డాయి.</p>
<p><b>13.</b></p>	<p>యోగదారునికికేటగిరి ల విషయంలో అవగాహన కల్పించాలి. అవగాహన కలిపించకుండానే కేసులు పెడుతున్నారు. ఉదా: CHAP CUTTAR లు, గో సంపదకు నీరు తాగించటము.</p>	<p>గౌరవనీయులైన TGERC ఆదేశాల మేరకు మాత్రమే టారిఫ్ వర్గీకరణ జరుగుతోంది. పక్కాగా అమలు చేయాలని క్షేత్రస్థాయి సిబ్బందికి ఆదేశాలు జారీ చేయటం జరిగినది.</p> <p>DPE సిబ్బంది తనిఖీ సమయంలో, సరఫరా యొక్క అనధికారిక వినియోగం గుర్తించబడితే, సర్వీస్ యొక్క వాస్తవ కేటగిరి కి సంబంధించి వినియోగదారులకు సరైన అవగాహన కలిపించటం జరుగుచున్నది. ఇంకా, గృహ జ్యోతి స్కీమ్లో ప్రయోజనాలను</p>



		<p>పొందడం కోసం, కొత్త మీటర్ సర్వీస్ కనెక్షన్లను తీసుకోవడం కోసం, వినియోగదారులకు అవగాహన కల్పించడం కోసం DPE వింగ్ ద్వారా అవగాహన కార్యక్రమాలు నిర్వహించబడుచున్నవి.</p>
14.	<p>త్యంత ఎక్కువ ఉన్న టారిఫ్ అడ్వర్టైజ్మెంట్ హోల్డింగ్స్ (Shops) వ్యాపార స్థలాలు దుకాణాల టారిఫ్ లు వేరు. వినియోగదారుల నుంచి అత్యధిక ధరలు వసూలు చేసే విమానాశ్రయాలు వారికి అత్యధిక టారిఫ్ గల హోల్డింగు లుప్రదర్శించే వారు అనుమతి లేకుండా ఇతర కేటగిరీలలో వాడుకుంటున్నారు ఇలాంటి వారిని విడిచిపెట్టి చాప్ కట్టర్ (గడ్డిని ముక్కలు చేసే యంత్రం) ఉపయోగించే రైతులపై కేసులు బుక్ చేయడం విచారకరం. Airport కేటగిరీని వేరు చేయాలి. Airport లోని హోటల్స్ షాప్స్ హోల్డింగ్స్ కేటగిరీని వేరు చేయాలి. బస్టాండ్ రైల్వే స్టేషన్ల సేవలు వేరు చేయాలి. Airport సేవలు వేరు చేయాలి.</p>	<p>DPE సిబ్బంది తనిఖీ సమయంలో, సరఫరా యొక్క అనధికారిక వినియోగం గుర్తించబడితే, సర్వీస్ యొక్క వాస్తవ కేటగిరీ కి సంబంధించి వినియోగదారులకు సరైన అవగాహన కలిపించటం జరుగుచున్నది మరియు అనుమతులు లేకుండా ఇతర కేటగిరీలలోవాడే వినియోగదారులు ఎవరైనా వారి పై కేసులు (Malpractice) బుక్చేయడం జరుగుచున్నది.</p> <p>ఆర్థిక సంవత్సరం 2024 - 25 సమగ్ర ఆదాయ ఆవశ్యకత మరియు ధరల ప్రతిపాదన లో HT-III కేటగిరీ ధరలను , HT-II కేటగిరీ ధరలతో సమానంగా ప్రతిపాదించడం జరిగినది.</p>
15.	<p>టారిఫ్ లవారీగా కేటగిరీలు అన్ని డిస్కం ఆఫీసులలో ప్రదర్శన చేయాలి. ప్రచారం కూడా చేయాలి.</p>	<p>టారిఫ్ ఆర్డర్లు టీజీఎస్పీడిసిఎల్వెబ్ సైట్లో ఉంచబడినవి మరియు విద్యుత్ బిల్లు వెనుక భాగంలో టారిఫ్ ల వారిగా కేటగిరీలు తెలియచేయటం జరుగుచున్నది.</p>
16.	<p>క్షన్ రిలీజ్ చేసిన తరువాత లిఖితపూర్వకంగాలేఖనం ఇవ్వాలి. అంచనా (ఎస్టిమేట్) కాపీలో ఉన్న సామాగ్రి, మరియు డౌరా చేసిన సామాగ్రి, వాడిన సామాగ్రి వేరువేరు గా ఉంటున్నాయి. వినియోగదారుడికి వాడిన సామాగ్రి యొక్క వివరాలతో పాటు release లెటర్ ఇవ్వాలి.</p>	<p>అంచనా వ్యయం మంజూరు అయిన తరువాత అందులో పొందు పరచిన సామాగ్రి అనగా అవసరమైన స్తంబాలు, DTR వివరాలు వినియోగదారులకి SMS రూపం లో వస్తుంది.</p> <p>ఫ్లోర్ నుండి సామాగ్రి తీసుకున్నాక వాటికి సంబంధించిన వివరాలు SMS ద్వారా తెలియ చేయటం జరుగుచున్నది.</p> <p>TG-IPASS &amp; Non TG-IPASS ధరఖాస్తుల రిలీజ్ సర్టిఫికెట్స్ వెబ్ సైట్ లో పొందుపరచటం జరుగుతుంది, వినియోగదారులు వెబ్ సైట్ నుండి వాటిని సేకరించవచ్చు.</p>
17.	<p>CGRF వారి పర్యటనలు పెంచాలి, ముందస్తు ప్రచారం జరగాలి.</p>	<p>i) CGRF ఫోరమ్ తెలంగాణ స్టేట్ ఎలక్ట్రిసిటీ రెగ్యులేటరీ కమిషన్ యొక్క 2015 రెగ్యులేషన్ నంబర్ 03లోని క్లాజ్ 2.3లో పేర్కొన్న</p>

		విధంగా స్థానిక కోర్టులను నిర్వహిస్తోంది. ii) ప్రచారానికి సంబంధించి, స్థానిక కోర్టులను నిర్వహించే సెక్షన్ లను ముందుగానే గుర్తించి, దిన పత్రికలలో ముందస్తుగా తేదీలను ప్రకటించటం జరుగుచున్నది.
18.	CGRF ఆర్డర్ల అమలు కొరకు డిస్కాంలు ప్రత్యేక వ్యవస్థ ను ఏర్పాటు చేసి, పని పూర్తి అయిన తరువాత వినియోగ దారుడితో తప్పక దృవీకరించు కోవాలి.	CGRF ఆదేశాలను ఎప్పటికప్పుడు DISCOM లోని వ్యవస్థ పరిశీలిస్తున్నది.
19.	సుల్టోనే పనిచేస్తూ పర్యవేక్షణ కొరకు బయటకు వెళ్ళని వారి కార్ల సౌకర్యాన్ని రద్దు చేసి సామూహిక బస్సు సౌకర్యం కల్పించాలి.	అధికారులకు బస్సు సౌకర్యం కల్పించడం సాధ్యం కాదు. డిపార్టుమెంటు పరంగా కార్లను వినియోగించే అధికారులకు రవాణా భత్యం మరియు ప్రయాణ భత్యాలు చెల్లించడం లేదు..
20.	5 స్టేషన్ నుండి ప్రతి రైతు కనెక్షన్ వరకు న్యూట్రల్ వైరు లాగాలి	దశలవారీగా పనులు చేపట్టనున్నారు
21.	ల యొక్క సర్వే నెంబర్లు, సర్వే నెంబర్లను అనుకొని ఉన్న సహజ నీటి వనరులైన ఒర్ రెలు, వాగులు, కాలువలలో మోటారు పెట్టుకునేందుకు రైతులు డిడి చెల్లిస్తే అట్టి కనెక్షన్ ఇచ్చిన అధికారులకు నోటీసులు పంపిస్తున్నారు కొరిందికి వృధాగా పోతున్న నీటిని రైతులు వాడుకుంటున్నప్పుడు, అధిక వర్షాలు కురిసినప్పుడు సహజ నీటి ప్రవాహం ఎక్కువైతే నష్టపోయేది రైతే. నీరు అధికమైనప్పుడు భూమి కోతకు గురి అవుతుంది. నీటి అవసరమున్నప్పుడు ఆ నీటిని వాడుకుంటాడు. అది రైతు హక్కు. ఇట్టి వసతి కొరకై విద్యుత్ కనెక్షన్ ఇవ్వాలి.	AGL దరఖాస్తుదారు నీటిపారుదల అధికారుల నుండి అభ్యంతరం లేని సర్టిఫికేట్ (NOC) పొందిన తర్వాత మరియు జిల్లా కలెక్టర్ సమ్మతితో చెరువులు, వరద కాలువల ద్వారా ఒక ప్రదేశం నుండి మరొక ప్రదేశానికి నీటిని పంపింగ్ చేసిన తర్వాత విద్యుత్ కనెక్షన్ కోసం దరఖాస్తు చేసుకోవచ్చు.
22.	మ్ సాగర్ పరాజెక్టు వరద కాలువ పై నూతన కనెక్షన్లు ఇవ్వడం లేదు. రైతులకు జీవనాధారమైన అత్యంత విలువైన భూమిని వరద కాలువ కోసమే ఇచ్చిన రైతులకు ఆ నీటిని వాడుకోవటానికి అడ్డుపడటం విచారకరం. గత ప్రభుత్వం రైతులు మోటార్ల ద్వారా నీరందించుకున్న ఎకరాలను తామే సాగులోకి తీసుకు వచ్చిన విధంగా ప్రకటించుకుంది. రైతులు పంట రక్షణ కొరకు ఎక్కడి నుంచి అయినా నీటిని తరలించవచ్చని చట్టంలో ఉంది. అందుకని అడిగిన వెంటనే నీటివనరుల వద్ద కూడా కనెక్షన్ ఇవ్వాలి	విషయం NPDCLకి సంబంధించినది కావున కామెంట్స్ లేవు

23.	<p>ర్హైంట్ వారి నిర్లక్ష్యం కారణంగా మరణానికి గురి అవుతున్న "రైతు హత్యలను" ఆపాలి. విద్యుత్ షాక్ కు గురి అయిన చనిపోయిన వారికి ఇచ్చే ఆర్థిక సహాయాన్ని రెట్టింపు చేయాలి. మరణించిన పశువులకు ఇచ్చే ఆర్థిక సాయాన్ని లక్ష రూపాయలుగా చేయాలి. గోరెలు మేకలకు Rs 12000/- చేయాలి.</p>	<p>ఎక్స్ గ్రేషియా చెల్లింపునకు గౌరవప్రదమైన TGERC ఆదేశాలను DISCOM అనుసరిస్తుంది.</p>
24.	<p>్యుత్ షాక్ కు గురి అయి ఆసుపత్రిలో చేరి పరీక్షించిన వారి ఆస్పత్రి ఖర్చులను డిపార్ట్మెంట్ వారు భరించాలి. వికలాంగులుగా మారితే అతనికి జీవన భృతినీ ఇవ్వాలి.</p>	<p>డ్యూటీలో ఉన్నప్పుడు ఎలక్ట్రికల్ నాన్-ఫాటల్ యాక్సిడెంట్ కు గురైన ఉద్యోగులు/ఆర్థిసన్ లకు టీజీఎస్పీడిసిఎల్ ద్వారా గుర్తింపు పొందిన ఆసుపత్రిలో ఇన్ పేషెంట్ గా ఉన్నప్పుడు మెడికల్ క్రిడిట్ కార్డ్ సౌకర్యాన్ని టీజీఎస్పీడిసిఎల్ అందిస్తోంది. ఎలక్ట్రికల్ నాన్-ఫాటల్ యాక్సిడెంట్ కు గురైన Un-manned కార్మికులకు బోర్డు ఆమోదం ప్రకారం మెడికల్ క్రిడిట్ కార్డ్ సౌకర్యం కూడా అందించబడుతుంది.</p>
25.	<p>ఆర్ఎఫ్ ఫోర్డ్ మెంబర్ కు రోజువారీ సిటీంగ్ Fee ప్రస్తుతం ఉన్న దానిని రెట్టింపు చేయాలి.</p>	<p>స్వతంత్ర సభ్యుని యొక్క సిటీంగ్ రుసుము లేదా ఇతర అలవెన్సులతో కూడిన వేతనం గౌరవనీయమైన TGERC ద్వారా ఎప్పటికప్పుడు నిర్ణయించబడుతుంది మరియు లైసెన్సుదారుచే భరించబడుతుంది.</p>
26.	<p>యాణ ఖర్చులు బస్సు రైలు చార్జీలు మరియు వాస్తవ ప్రయాణ సమయం లో అయ్యే భోజన నివాస ఖర్చులు చెల్లించాలి. దీనికిగాను ఒక కిలో మీటర్ కు ఇంత మొత్తం అని నిర్ణయించాలి.</p>	<p>G.O. Ms.No.60, Dt:02-05-2015, r/wలో జారీ చేసిన ఉత్తర్వుల ప్రకారం మరియు TOO Ms.No.155, Dt:17-08-2015, ప్రకారం ప్రయాణ మరియు రోజువారీ భత్యాలు మరియు బస &amp; బోర్డింగ్ చార్జీలు ఇప్పటికే నిర్ణయించబడ్డాయి మరియు చెల్లించబడుతున్నాయి.</p>
27.	<p>పత్వ రంగంలో విద్యుత్ సేవలు కొనసాగాలంటే కాలానుగుణంగా పెరిగిన ధరల వేతనాలు విద్యుత్ కొనుగోలు ఇతర ఖర్చులు పెరిగిన విధంగానే టారిఫ్ కూడా, చెల్లించ గలిగే స్తోమతను బట్టి పెంచాలి. సుదీర్ఘకాలం పెంచకుండా ఉంటే డిస్కంల మనుగడ కష్టం అయ్యి విద్యుత్తు సరఫరా పరైవేటు రంగానికి బదిలీ అయ్యే అవకాశం ఉంది.</p>	<p>ప్రభుత్వ రంగంలో విద్యుత్ సేవలు కొనసాగించడానికి, విద్యుత్ వినియోగదారుల ఆర్థిక స్తోమతను బట్టి టారిఫ్ ప్రతిపాదనలు నిర్ణయించి గౌరవనీయమైన కమీషన్ ముందు పొందు పరచటం జరిగినది.</p>
28.	<p>HD DOMESTIC వినియోగదారులను తప్పదోవ పట్టించి 33kv సబ్ స్టేషన్ పెట్టుకోవాల్సి వస్తున్నది. నగరాలలో భూమి కొరత కారణంగా 33 kv సబ్ స్టేషన్ పెట్టుకోలేరు. వాస్తవ వినియోగాన్ని మాత్రమే లెక్కించాలి. కనెక్టెడ్</p>	<p>—</p>

	వినియోగాన్ని లెక్కించరాదు. ఫైర్ ఎక్స్టింషన్ ను లెక్కించరాదు.	
29.	TSSPDCL, TSNPDCL CMD లు గా ఐఎఎస్ అధికారులు సేవలు అందించడానికి వచ్చి, వినియోగదారునికి సత్వర నిజాయితీ సేవలు అందించే ప్రయత్నం చేస్తున్నందుకు వారికి ధన్యవాదాలు.	—
30.	TSNPDCL వారు కాలిఫోర్నియా DTR లు రవాణా ఎంత పర్సెంటేజి చేశాము అని, దుర్మరణాలకు కారణాలేంటి అని అన్ని వివరాలు వ్రాశారు వారికి ధన్యవాదాలు, TSSPDCL వారు కూడా వివరాలు ఇవ్వాలి, కరెంటు స్తంభాలు పడి చనిపోయిన రైతుల లెక్క కూడా ఇవ్వాలి. సెస్ సిరిసిల్ల వారు ARR లో వారి లెక్కలు మినహా ఎటువంటి సేవల వివరాలు ఇవ్వలేదు. వారు కూడా అన్ని వివరాలు ఇవ్వాలి.	2023-24 ఆర్థిక సంవత్సరంలో TGSPDCLలో విద్యుత్ ప్రమాదాలు సంభవించాయి, 288 పరాణాంతక ప్రమాదాలలో 276 ప్రమాదాలు వినియోగదారుల తప్పిదాలు, సాధారణ ప్రజల అజాగ్రత్త వైఖరి కారణంగా సంభవించాయని గమనించాలి; టీజిఎస్పిడిసిఎల్ సిబ్బంది అత్యంత జాగ్రత్తలు తీసుకున్నప్పటికీ డిపార్ట్మెంటల్ సిబ్బంది వల్ల 12 ప్రమాదాలు జరగగా, టీజిఎస్పిడిసిఎల్లోని కాంట్రాక్ట్ లేబర్ వల్ల 5 ప్రమాదాలు జరిగాయి. అందువల్ల, టీజిఎస్పిడిసిఎల్ ద్వారా అనేక అవగాహన కార్యక్రమాలు మరియు ప్రకటనలు నిర్వహించిన తర్వాత కూడా, భద్రతా చర్యలను పాటించకుండా వినియోగదారుల అజాగ్రత్త కారణంగా చాలా ప్రమాదాలు సంభవించాయి.
31.	కేటగిరి వివరాలు అన్ని విద్యుత్తు ఆఫీసుల్లో ప్రదర్శించాలి.	టీజిఎస్పిడిసిఎల్ వెబ్ సైట్ లో ( <a href="http://www.tgsouthernpower.org">www.tgsouthernpower.org</a> ) అన్ని కేటగిరి ల వివరాలు పొందు పరచబడ్డాయి, వినియోగదారులు వాటిని ఉచితంగా పరిశీలించవచ్చును.
32.	వసాయ విద్యుత్ సరఫరా కాస్టు ఎంత, టారిఫ్ ఎంత, ప్రస్తుతం ప్రభుత్వం చెల్లిస్తున్నది ఎంత తెలియచేయాలి.	2023-24 ఆర్థిక సంవత్సరానికి వ్యవసాయ విద్యుత్ సరఫరా కాస్టు 7.47 Rs./Kwh, పూర్తి ఖర్చు టారిఫ్ Rs. 0.62 Rs./Kwh, ప్రభుత్వం రూ. 705 కోట్లు చెల్లించడం జరిగినది.
33.	నీటిపారుదల శాఖ వారు HD LIFT ఇరిగేషన్ వారు చెల్లించాల్సిన బిల్లులు వెంట వెంటనే వసూలు చేయాలి.	పెండింగ్లో ఉన్న బకాయిల చెల్లింపు కోసం నీటిపారుదల శాఖతో క్రమం తప్పకుండా చర్యలు తీసుకోవడం జరుగుచున్నది.

34.	<p>హైదరాబాద్ సౌత్ సర్కిల్ కు సపై చేసే విద్యుత్తు ఎంత, వసూలు చేసేది ఎంత వివరాలు ఇస్తూ, వీరి బిల్లులు సరిగా వసూలు చేసే విధంగా చూడాలి.</p>	<p>వినియోగం (KWH MU), FY 2023-24 కోసం హైదరాబాద్ సౌత్ సర్కిల్ కు సంబంధించి FY 2023-24 సేకరణ % ఈ క్రింది విధంగా ఉంది:</p> <table border="1" data-bbox="1450 280 2230 440"> <thead> <tr> <th>ప్రత్యేక</th> <th>యూనిట్లు</th> <th>FY 2023-24</th> </tr> </thead> <tbody> <tr> <td>వినియోగం</td> <td>MU</td> <td>1356.62</td> </tr> <tr> <td>సేకరణ</td> <td>Rs. in Crs</td> <td>924.83</td> </tr> </tbody> </table> <p>నిర్దేశించిన తేదీ లోపల బిల్లు కట్టనివారి యొక్క విద్యుత్ సరఫరా నిలిపివేయ బడుతుంది మరియు మొండి బకాయిలు వున్న వినియోగదారుని పై రెవెన్యూ రికవరీ యాక్ట్ అమలు చేస్తున్నాము</p>	ప్రత్యేక	యూనిట్లు	FY 2023-24	వినియోగం	MU	1356.62	సేకరణ	Rs. in Crs	924.83
ప్రత్యేక	యూనిట్లు	FY 2023-24									
వినియోగం	MU	1356.62									
సేకరణ	Rs. in Crs	924.83									

**23 & 24 Replies to the Objections/Suggestions raised on Distribution Business ARR & Wheeling Tariff Proposals for 5<sup>th</sup> Control Period by Mahalakshmi Profiles Pvt Ltd & MPL Limited, Reg office: MPL House, 13-6-439/1/A/111/10&11, Balaji Nagar, Pillar No. 75, Mehdipatnam Ring Road, Hyderabad.**

<b>S.No.</b>	<b>Summary of Objections / Suggestions</b>	<b>Response of the Licensee</b>
1	<p>We are very much thankful to your good office for supporting Telangana Industry from time and again. TSERC constituted on 3rd November'2024, with prime focus of protecting the interests of the consumers. In light of this, we trust that the Commission will carefully consider our concerns in line with this mandate.</p> <p>We wish to draw your attention to the severe crisis already faced by the steel industry in Telangana. Any further increase in charges, including ARR, Wheeling Charges, and Cross Subsidy surcharge, additional surcharges, will place heavy burden on our industry, which is currently struggling to remain viable in an increasingly competitive market. We are deeply concerned about the proposed increases in ARR, Wheeling and Cross Subsidy surcharge and additional surcharge, which will place an unsustainable burden on the steel industry. This increase will severely affect our industry's viability, which is already facing economic pressures.</p>	No comments
2	<p>We also request that the difference in charges for 11KV, 32KV, and 132KV be maintained at earlier levels to ensure fairness and competitiveness across various industries. 132KV has significantly lower transmission losses compared to 11KV and 33KV and industries have invested heavily in the infrastructure for 132KV. It is crucial that these differences be recognized in the tariff structure.</p> <p>We urge the Hon'ble Commission to reconsider the proposed charges to ensure a conducive environment for the industry.</p>	<p>Discoms have proposed uniform wheeling charges across voltage levels similar to intra state and inter-state transmission charges to encourage open access consumption across all voltage levels. Moreover, having uniform wheeling charges will lead to simplified tariff structure, bring in transparency in billing process and would help in streamlining the process of grid planning going further. This would also help in improving administrative efficiency and lead to better resource allocation and lesser disputes related to undue variations in wheeling charges being levied on consumers.</p> <p>The decision for consideration of proposal is under the purview of Hon'ble Commission</p>

**25. Replies to the Objections/Suggestions raised on Distribution Business ARR & Wheeling Tariff Proposals for 5<sup>th</sup> Control Period by Sri Gopinath Injeti, Chief Executive Officer to South Indian Cement Manufactures, Association, Administrative Office, 3<sup>rd</sup> Floor, 36<sup>th</sup> Square, Plot No. 481, Road No.36 Jubilee Hills, Hyderabad -500034.**

SI.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>The TGDISCOMS have submitted petitions for determining the ARR and Wheeling Tariffs for their Distribution Businesses for FY 2024-29, as well as for the ARR of the Retail Supply Businesses for the same period and Tariff Proposals for FY 2024-25. These petitions are filed under the Telangana State Electricity Regulatory Commission (Multi-Year Tariff) Regulation, 2023 (MYT Regulations 2023).</p>	Noted.
2	<p>According to Regulation 6 of the TSERC (MYT Regulations 2023), Multi-Year Tariff petitions must be filed by November 30 of the year preceding the first year of the Control Period. The pertinent details include:</p> <ul style="list-style-type: none"> <li>• Filing Requirements for Distribution Licensees:</li> <li>• True-up of the preceding year</li> <li>• Aggregate Revenue Requirement for each year of the Control Period Tariff and Charges proposal for each year of the Control Period</li> <li>• Filing Requirements for Retail Supply Licensees:</li> <li>• True-up of the preceding year</li> <li>• Aggregate Revenue Requirement for each year of the Control Period</li> </ul> <p>Projected revenue gap for the first year of the Control Period</p> <p>Proposal for consumer category-wise retail supply tariff and charges for the first year of the Control Period</p> <p>The regulations stipulate that Multi-Year Tariff petitions for the Control Period starting April 1, 2024, must be filed by January 31, 2024. The current petitions fall short in two critical areas:</p> <ul style="list-style-type: none"> <li>• The Licensees have not included the True-up application for the previous year (FY 2022-23) for both Distribution and Retail Supply (refer to Regulations 6.2(b)(i) and 6.2(c)(i))</li> </ul> <p>The petitions have been submitted approximately 10 months late (July 2024 and September 2024 for Distribution and Retail Supply respectively), which the Objector believes is unjustifiable. The reasons provided by the Licensees appear to be an attempt to rationalize this significant delay. Due to these non-compliant filings with the MYT Regulations 2023, the submissions from the Petitioner should not be considered.</p>	<p>There was a change in regulatory regime because of which DISCOMs needed to collect additional data for preparing the petitions. Moreover, due to the enforcement of model code of conduct, the DISCOMs could not file the petition. The DISCOMs have duly submitted the condonation of delay petition before the Hon'ble Commission stating these reasons</p> <p>The filings of true up application for distribution and retail supply business would be filed separately along with Annual Performance Review of Distribution Business for FY 2023-24</p>

3	<p>In the Order dated June 7, 2024, concerning the Annual Performance Review of Distribution Business for FY 2022-23, the Hon'ble Commission approved a Revenue Surplus of Rs. 1,736.34 crore for TGSPDCL and Rs. 2,227.42 crore for TGNPDCL. The relevant excerpt states: "4.12 Recovery of Revenue Gap/(Surplus) 4.12.1 As per Clause 10.5 of Regulation 04 of 2005 the Commission directs the Applicant to include and propose the adjustment mechanism of the total approved revenue surplus for TGSPDCL for Rs. 1736.34 crore (gap of Rs. 20.54 crore for FY 2019-20, surplus of Rs. 253.05 crore for FY 2020-21, surplus of Rs. 1114.66 crore for FY 2021-22 and surplus of Rs. 389.17 crore for FY 2022-23) and revenue surplus for TGNPDCL for Rs. 2227.42 crore (surplus of Rs. 384.76 crore for FY 2019-20, surplus of Rs. 354.02, surplus of Rs. 634.03 crore and surplus of Rs 854.62 crore) in its end of control period review petition for 4th control period. This Order is corrected and signed on the 7th day of June, 2024." It is emphasized that the impact of the Revenue Gap related to the True-up from FY 2019-20 to FY 2022-23 should be reflected in the Retail Supply Tariff for FY 2024-25.</p>	<p>Clause 4.12.1 of order dated 07.06.2024 on Annual Performance Review of Distribution Business states that the adjustment mechanism of the total approved revenue surplus is to be proposed in the end of control period review petition for 4th Control Period. The last petition for 4th Control period i.e., for FY 2023-24 is yet to be filed by TG Discoms wherein the adjustment mechanism would be provided as per directions given in the aforementioned order.</p>
4	<p>TGSPDCL has projected asset additions totaling Rs. 31,589 crores for the Control Period FY 2024-29, which is considerably higher than the actual Capital Cost capitalized by the Distribution Licensees during the previous control period (FY 2019-24). Such high projections for Capital Cost may adversely affect the financial health of the Distribution Licensees, as failure to capitalize the projected costs would lead to revenue surplus, contradicting the principles of reasonable cost recovery.</p>	<p>The proposed asset additions had been estimated on the basis of the growth in demand/sales, and the required infrastructure to support such growth in demand/sales to ensure reliable and quality power supply. Further, the Licensee submits that the proposed asset additions would be capitalized as per prevailing Regulations / norms and the same will be reflected in the true-ups for the respective time period.</p>



**26. Replies to the Objections/Suggestions raised on Distribution Business ARR & Wheeling Tariff Proposals for 5th Control Period by Dilip Re-Rolling Pvt Limited, 21-1-414, Rikabgunj, Hyderabad- 500002**

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>Dear Sir,</p> <p>We are very much thankful to your good office for supporting Telangana industry from time and again. TSERC constituted on 3rd November 2014, with prime focus of protecting the interests of the consumers. In light of this, we trust that the Commission will carefully consider our concerns in line with this mandate. We wish to draw your attention to the severe crisis already faced by the steel industry in Telangana. Any further increase in charges, including ARR, Wheeling Charges, and Cross Subsidy surcharge, additional surcharges, will place heavy burden on our industry, which is currently struggling to remain viable in an increasingly competitive market.</p> <p>We are deeply concerned about the proposed increases in ARR, Wheeling, and Cross Subsidy surcharge and additional surcharge, which will place an unsustainable burden on the steel industry. This increase will severely affect our industry's viability, which is already facing economic pressures.</p> <p>We also request that the difference in charges for 11KV, 32KV, and 132KV be maintained at earlier levels to ensure fairness and competitiveness across various industries. 132KV has significantly lower transmission losses compared to 11KV and 33KV, and industries have invested heavily in the infrastructure for 132KV. It is crucial that these differences be recognized in the tariff structure.</p> <p>We urge the Hon'ble Commission to reconsider the proposed charges to ensure a conducive environment for the industry.</p> <p>We request an opportunity to present these concerns in detail during the upcoming public hearings.</p> <p>Thank you for your attention to this urgent matter.</p>	<p>Discoms have proposed uniform wheeling charges across voltage levels similar to intra state and inter-state transmission charges to encourage open access consumption across all voltage levels. Moreover, having uniform wheeling charges will lead to simplified tariff structure, bring in transparency in billing process and would help in streamlining the process of grid planning going further. This would also help in improving administrative efficiency and lead to better resource allocation and lesser disputes related to undue variations in wheeling charges being levied on consumers.</p> <p>The decision for consideration of proposal is under the purview of Hon'ble Commission</p>

**27. Replies to the Objections/Suggestions raised on Distribution Business ARR & Wheeling Tariff Proposals for 5th Control Period by Anand Ispat Udyog Limited Office: 5-8-363 to 365, A&B, 3rd Floor, Chirag Ali Lane, Abid Road, Hyderabad.**

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>Dear Sir,</p> <p>We are very much thankful to your good office for supporting Telangana industry from time and again. TSERC constituted on 3rd November 2014, with prime focus of protecting the interests of the consumers. In light of this, we trust that the Commission will carefully consider our concerns in line with this mandate.</p> <p>We wish to draw your attention to the severe crisis already faced by the steel industry in Telangana. Any further increase in charges, including ARR, Wheeling Charges, and Cross Subsidy surcharge, additional surcharges, will place heavy burden on our industry, which is currently struggling to remain viable in an increasingly competitive market.</p> <p>We are deeply concerned about the proposed increases in ARR, Wheeling, and Cross Subsidy surcharge and additional surcharge, which will place an unsustainable burden on the steel industry. This increase will severely affect our industry's viability, which is already facing economic pressures. We also request that the difference in charges for 11KV, 32KV, and 132KV be maintained at earlier levels to ensure fairness and competitiveness across various industries. 132KV has significantly lower transmission losses compared to 11KV and 33KV, and industries have invested heavily in the infrastructure for 132KV. It is crucial that these differences be recognized in the tariff structure.</p> <p>We urge the Hon'ble Commission to reconsider the proposed charges to ensure a conducive environment for the industry.</p> <p>We request an opportunity to present these concerns in detail during the upcoming public hearings.</p> <p>Thank you for your attention to this urgent matter.</p>	<p>Discoms have proposed uniform wheeling charges across voltage levels similar to intra state and inter-state transmission charges to encourage open access consumption across all voltage levels. Moreover, having uniform wheeling charges will lead to simplified tariff structure, bring in transparency in billing process and would help in streamlining the process of grid planning going further. This would also help in improving administrative efficiency and lead to better resource allocation and lesser disputes related to undue variations in wheeling charges being levied on consumers.</p> <p>The decision for consideration of proposal is under the purview of Hon'ble Commission</p>

<b>28. Replies to the Objections/Suggestions raised on Distribution Business ARR &amp; Wheeling Tariff Proposals for 5th Control Period by Gaurav Maheshwari Indian Energy Exchange Corporate Office: Plot No. C001/A/1, 9th Floor, Max Tower Sector 16B, Noida UP-201301</b>		
<b>Sl.No</b>	<b>Summary of Objections / Suggestions</b>	<b>Response of the Licensee</b>
1	The Distribution Licensees of the state of Telangana viz. Southern Power Distribution Company of Telangana Ltd. and Northern Power Distribution Company of Telangana Ltd. (hereinafter referred to as “TGSPDCL and TGNPDCL” or collectively as “Licensees” or “Petitioners” or “DISCOMs”) have filed the present Petitions before the Hon’ble Telangana State Electricity Regulatory Commission (hereinafter referred to as ‘Hon’ble Commission’) for approval of ARR & Proposed Wheeling Tariffs for Distribution Business for 5th Control Period (FY 2024-25 to FY 2028-29) in accordance with the provisions of TSERC Tariff Regulations.	No Comments
2	IEX is submitting its views and observations on the Tariff Petition filed by the DISCOMs in subsequent paragraphs.	No Comments
3a	Computation of Voltage Wise Wheeling Charges in Rs./ kVA/ hr for short term open access As against the submission of the Petitioner DISCOMs, the Hon’ble Commission in the past ARR and Wheeling Tariffs Order for Distribution Business for 4th Control Period (FY 2019-20 to FY 2023-24) dated 29.04.2020, has determined voltage wise wheeling charges for 11 kV, 33 kV and LT network connected consumers.	No Comments
3b	Further, as per regulation 79.2 of the (Multi Year Tariff) Regulation, 2023, the Hon’ble Commission has specified that the wheeling charges shall be determined separately for LT voltage, 11 kV and 33 kV voltage. Relevant extract of the Regulations is provided below: "79.2 The Wheeling Charges of the Distribution Licensee shall be determined by the Commission on the basis of a petition for determination of Tariff filed by the Distribution Licensee: Provided that the Wheeling Charges shall be denominated in terms of Rupees/kVA/month for long-term and medium-term Open Access and in terms of Rupees/kVA/hr for short-term Open Access, for the purpose of recovery from the Distribution System User, or any such denomination, as may be stipulated by the	Discoms have put forward this proposal, which is a suggestion (not mandatory) before the Hon’ble Commission by citing notification issued by Ministry of Power, dated 10th January 2024 and notification dated 17th January 2024. The proposal for moving towards uniform wheeling charges and losses similar to the systems adopted by inter-state and intra-state transmission system would lead to a simplified tariff structure, bring in transparency in billing process and would help in streamlining the process of grid

	<p>Commission:          Provided further that the Wheeling Charges shall be determined separately for LT voltage, 11 kV voltage and 33 kV voltage, as applicable.”          The distribution licensee in the present Petition has claimed single wheeling charges with no voltage wise bifurcation, which does not conform to the regulations notified by the Hon’ble Commission. Further, Open Access consumers are utilizing HT network only, as they are allowed connections at 11 kV and above; therefore, levy of LT network wheeling charges on the consumers may be irrational.</p>	<p>planning going further. This would also help in improving administrative efficiency and lead to better resource allocation and lesser disputes related to undue variations in wheeling charges being levied on consumers. Further with distributed generation picking up pace, every consumer going further would become a prosumer and voltage wise segregation for levying wheeling charges may be of very little significance.</p>
3c	<p>Further, the above regulation also entails that the wheeling charges for short term open access shall be determined and applicable at Rupees/ kVA/ hr, however the distribution licensees have claimed wheeling charges at Rupees/ MW/ Month which is not aligned with the Regulations notified by the Hon’ble Commission.</p>	<p>Discoms have proposed uniform wheeling charges across voltage levels similar to intra state and inter state transmission charges to encourage open access consumption across all voltage levels</p>

**29. Replies to the Objections/Suggestions raised on Distribution Business ARR & Wheeling Tariff Proposals for 5th Control Period by Scan Energy & Power Ltd Office: B301, 8-2-618/2A to C, 3rd Floor, Delta Seacon, Road No.11, Banjara Hills, Hyderabad.**

Sl.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>We are very much thankful to your good office for supporting Telangana industry from time and again. TSERC constituted on 3rd November 2014, with prime focus on protecting the interests of the consumers. In light of this, we trust that the Commission will carefully consider our concerns in line with this mandate.</p> <p>We wish to draw your attention to the severe crisis already faced by the steel industry in Telangana. Any further increase in charges, including ARR, Wheeling Charges, and Cross Subsidy surcharge, additional surcharges, will place heavy burden on our industry, which is currently struggling to remain viable in an increasingly competitive market.</p> <p>We are deeply concerned about the proposed increases in ARR, Wheeling, and Cross Subsidy surcharge and additional surcharge, which will place an unsustainable burden on the steel industry. This increase will severely affect our industry's viability, which is already facing economic pressures.</p> <p>We urge the Hon'ble Commission to reconsider the proposed charges to ensure a conducive environment for the industry.</p> <p>We request an opportunity to present these concerns in detail during the upcoming public hearings.</p> <p>Thank you for your attention to this urgent matter</p>	<p>The decision for consideration of proposal is under the purview of Hon'ble Commission</p>

**30. Replies to the Objections/Suggestions raised on Distribution Business ARR & Wheeling Tariff Proposals for 5th Control Period by Rayalaseema Industries India Private Ltd Sy.No. 115/2/A/2A, Teegapur Village, IDA Kothur, Mahaboob Nagar Dist-509228**

SI.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>We are very much thankful to your good office for supporting Telangana industry from time and again. TSERC constituted on 3rd November 2014, with prime focus on protecting the interests of the consumers. In light of this, we trust that the Commission will carefully consider our concerns in line with this mandate.</p> <p>We wish to draw your attention to the sever crisis already faced by the steel industry in Telangana. Any further increase in charges, including ARR, Wheeling Charges, and Cross Subsidy surcharge, additional surcharges, will place heavy burden on our industry, which is currently struggling to remain viable in an increasingly competitive market.</p> <p>We are deeply concerned about the proposed increases in ARR, Wheeling, and Cross Subsidy surcharge and additional surcharge, which will place an unsustainable burden on the steel industry. This increase will severely affect our industry's viability, which is already facing economic pressures. We urge the Hon'ble Commission to reconsider the proposed charges to ensure a conducive environment for the industry.</p> <p>We request an opportunity to present these concerns in detail during the upcoming public hearings.</p> <p>Thank you for your attention to this urgent matter.</p>	<p>The decision for consideration of proposal is under the purview of Hon'ble Commission</p>

<b>31. Replies to the Objections/Suggestions raised on Distribution Business ARR &amp; Wheeling Tariff Proposals for 5th Control Period by Magadha Village Housing Society, Magadha Village, CBIT(PO), Kokapet, Rajendra Nagar, RR District</b>		
<b>Sl.No.</b>	<b>Summary of Objections / Suggestions</b>	<b>Response of the Licensee</b>
1	With reference to the public notice dated 20th September 2024, inviting objections/ suggestions on the Retail Supply Tariff Order for the year 2024-25, we are writing to request the inclusion of specific provision in the Retail Supply Tariff Order for the Year 2024-25 for collection of Domestic Category LT-I tariff for consumption of power for Sewage Treatment Plant (STP), Water softener plant, Borewells, Lighting for Park areas, Open Spaces, streetlights, Gym, Swimming Pool, and Clubhouse and any other facilities provided other than commercial activities within the common areas of residential Villas/ house gated Community purpose of all the residents and not for any commercial activities.	No comments
2	We are the residents of a residential Villas gated community called Magadha Village, situated at Gandipet Road, Kokapet, Hyderabad. Our Community is a gated community having a single entrance to the public access road. All the houses within the Community are being exclusively used for residential purposes. The facilities like Sewage Treatment Plant, Water Softener Plant, Borewells, Lighting for Park areas, Open spaces, play areas, streetlights, clubhouse including gym, guest rooms, halls, and are being arranged in our Community exclusively for the purpose of all the residents and not for any commercial activities.	No comments
3	Surprisingly, the ADE, Operation: Ibrahimbagh, the then TSSPDCL has issued an Assessment Notice for Back Billing Order No: ADE/OP/IBGH.F.No./D.N.1662 dated: 26th February 2024 in the name of our community stating that our Community Service Connection bearing no. 342900667 was utilised for STP, Water Plant, Bores and Park area of the community, which comes under Category II, but the service is being billed under Category I. Further, the ADE has imposed back billing of Rs. 2,59,531/- and directed us to give appropriate representation to the notice, if we are not agreeable to the assessed amount. Accordingly, we have given a reply to the said notice and the same is pending before the ADE for disposal. However, pending disposal, the TGSPDCL has started charging our community service connection under LT-II category which is arbitrary	No comments

4	<p>Upon verification from the ADE office, we were informed that as per the terms and conditions of the Tariff Order for the FY 2023-24, the tariff for the aforesaid facilities like Sewage Treatment Plant (STP), Water softener plant, Borewells, Lighting for Park areas, Open Spaces, streetlights, Gym, Swimming Pool, and Clubhouse and any other facilities provided other than commercial activities, provided within the common areas of residential Villas/ houses gated Community was not specifically mentioned. Therefore, the TGSPDCL has categorized the service connections provided for the common areas of all the gated communities as per the Domestic LT-II(B) category, which is inaccurate and arbitrary. In fact, as per Chapter 10.12 Category-wise Specific Conditions of LT Tariff for LT-I: Domestic of Tariff Order dated 24.03.2023 issued by the then TSERC for FY 2023-24, which is reproduced herein below for your easy reference:</p> <p>“10.12.2 For common services like water supply, common lights in corridors and supply for lifts in multistoried buildings, consumers shall be billed electricity charges as follows:</p> <p>i) At LT-II(B)(ii) if the plinth area occupied by the domestic consumers is 50% or more of the total plinth area.</p> <p>ii) At LT-II(B), if the plinth area occupied by the domestic consumers is less than 50% of the total plinth area.</p> <p>iii).....”</p> <p>Therefore, the above said provision of terms and conditions shall apply to our residential Villas/ houses community as well.</p>	Under the purview of Hon’ble Commission
5	<p>It is pertinent to note that the aforesaid facilities provided within the common areas of our community serve as essential amenities for the residents’ well-being and recreational needs within the community. Their primary function is to enhance the quality of life and foster a sense of community among the residents, emphasizing their domestic utility rather than commercial usage. These facilities are not open to the public and are exclusively used by residents of our villa community. There is no commercial activity or profit generation associated with their operation. These facilities within the common/shared areas of the residential Villas Community are not utilized for commercial purposes that generate revenue, and hence, they should not be categorized under the Commercial Category.</p>	Under the purview of Hon’ble Commission



6	Further, the Borewells are for drawing the water for domestic purposes of all the residents within the residents of Villas Community. Water plant is used for softening the bore water and STP is used for treating the sewage generated by the residents of the community, and they are not used for any commercial purposes. The Water Plant and Sewage Treatment Plants are critical infrastructure elements that ensure the proper treatment of drinking water drawn from the borewells and wastewater generated by the residents, respectively. Their primary function is to maintain a healthy and safe living environment for the residents, which aligns with domestic usage rather than commercial activities	Under the purview of Hon'ble Commission
7	Similarly, the Gym and Swimming Pool are facilities that cater to the health and recreational needs of the residents. They are not intended for commercial use but instead serve as amenities for the residents to maintain their physical fitness and engage in leisure activities. The Clubhouse is a communal space where residents can gather, socialize, and participate in various activities, fostering a sense of community and social interaction among them. Further, the Park areas and streetlights are the basic necessities for the convenience of all the residents within the Villas Community	Under the purview of Hon'ble Commission
8	The maintenance and electricity costs for these common services are borne by all residents collectively through monthly maintenance charges. This aligns with the domestic Category's principle of shared expenses for essential utilities within residential houses	Under the purview of Hon'ble Commission
9	It is imperative to recognize the distinct purpose of these common services within the villa community and appropriately classify them under the Domestic Category in the upcoming year's tariff order. Therefore, considering the purpose, usage, and cost-sharing structure of these common services, I request your Hon'ble Authority to specify their classification to the Domestic Category (LT-I(B)(ii)) for the Financial year 2024-25's tariff order. This aligns with the true nature of their usage and ensures fair and accurate billing for the residents	Under the purview of Hon'ble Commission

**32. Replies to the Objections/Suggestions raised on Distribution Business ARR & Wheeling Tariff Proposals for 5th Control Period by PRAYAS (Energy Group)**

Sl.No	Summary of Objections / Suggestions	Response of the Licensee
1	<p>Uniform wheeling charge for different voltages:  DISCOM has proposed uniform wheeling charges of Rs. 440/kVA/month for 33kV, 11kV and LT. This is an opposed to voltage based wheeling charges and loss in the previous MYT Order. In Section 5 of the petition on Rational of Wheeling charges, DISCOM has argued that Distributed RE (DRE), storage and wind-solar hybrid would increase network losses, due to reverse power flow. From the Additional Information (Replies to TGERC queries), DISCOMs have not given any computation on the extent of reverse power flow and resultant increase in network losses. Conventional wisdom on DRE is that they help to reduce network losses, since they are located closer to consumption points. Are the DISCOMs expecting significant DRE installations, with capacity exceeding contracted load? Are distributed storage facilities being planned, which may increase reverse power flow? As per Net metering regulations, RST is permitted only to some extent of loading of DTR (50% to maximum 100%). Therefore, it is not clear how the duration and current would increase normal flows to increase losses. We request the DISCOMs to provide detailed calculations on this. Transmission is an interconnected grid and there is some logic in having similar wheeling for all voltages. It is not clear how the same logic is being applied for distribution network.</p>	<p>The various policies are initiated by the Government of India and State Government with a vision of increasing the share of RE to 50% of its total power capacity by 2030 and to encourage the installation of Rooftop solar power plants and Ground mounted solar power plants and various Hybrid RE Generation sources. Initiatives taken like 100% solar villages, installation of solar plants under KUSUM components will cause flow of reverse current in the system. Apart from the above, there is no ceiling for the capacity of Solar plants for the Captive consumers as per the latest Electricity Amendments Rules by MoP, Govt. of India. This will further increase in the reverse flow of current which in turn will increase in the Line Losses of the Distribution Utility. Hence the DISCOMs have proposed the Uniform Wheeling Charges and Uniform Aggregate Losses applicable for the RE Consumers. The Distribution Licensee will take the steps to measure the actual quantum of reverse power and will be made available in the next filing where the Distributed Generations are getting added on/point of injection.</p>

2	<p>Capex plans in the petitions of TGSP and TGNP mention the proposed plan to install smart meters for all non-agriculture consumers in the next five years. 42% of the total 28,402 Cr total capex of TGSP from FY25-29 It is clear that the investment is significant and the GoI financial support for smart meter is low. From Table 5, it is also clear that 94% of the cost is for single phase consumer meter. The petition does not provide any cost benefit analysis of this investment, which would have to be made by the DISCOMs, hence borne by the State or consumers. The cost for DT metering is quite low, and it is surprising why the DISCOM is not ready to take it up, without waiting for RDSS project approval. We request response to the following questions:</p> <p>a) Is the proposal for Smart metering approved by the Hon'ble TGERC? If so, what is the roll-out plan?</p> <p>b) Is the costing under Capex/ Totex? If Totex, what is the framework for cost-pass through, prudence check and performance evaluation?</p> <p>c) Have the DISCOMs provided a cost benefit analysis of the Smart metering proposal? If so, request to share the studies.</p> <p>d) Has an Advanced Metering Infrastructure Service Provider (AMISP) been appointed? If so, can the contract along with the Service Level Agreement (SLAs) be shared?</p>	<p>Installation of smart meters / replacement of existing energy meters with smart meters is a measure that will bring in more efficiency in Discoms' billing and collection process. This will ultimately lead to better service delivery by Discoms and ultimately the benefit for the same will be passed on to the consumers. As smart meters installation is a country wide exercise being done basis guidelines / policy measures by Ministry of Power, Government of India, it is apt that TGDIs budget the capital expenditure that would be incurred for smart meters installation for its consumers.</p>
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