

TSSPDCL Response on Stakeholder Comments for
“Draft Amendment for General Terms & Conditions of Supply (GTCS)”

1. Response to Agarwal Foundries:

S. No.	Existing Regulation (GTCS Consolidated)	Draft Amendment GTCS 2022 (New)	Comments from Agarwal Foundries	Response by TSSPDCL												
1	NA	In case of consumer categories, for whom the voltage-wise tariff is applicable, the Company shall levy the tariff as per the actual supply voltage.	<p>Levying the tariff as per the actual supply voltage</p> <p>Para 9.27.3 of Retail Supply Tariff Order of FY 2022-23 which specifies the voltage levels for consumers seeking to avail HT supply for different levels of CMDs is extracted here under:</p> <p>The voltage at which supply has to be availed by:</p> <p>i. HT Consumers seeking to avail of supply on common feeders shall be: For total contracted Demand with the licensees and all other sources.</p> <table><tr><td>Up to 1500 kVA</td><td>11 kV</td></tr><tr><td>1501 kVA to 5,000 kVA</td><td>33 kv</td></tr><tr><td>Above 5,000 kVA</td><td>132 kV or 220 kV as may be decided by Licensee</td></tr></table> <p>ii. HT Consumers seeking to avail of supply through independent feeders from the substations where transformation to required voltage takes place shall be: For total contracted Demand with the licensees and all other sources.</p> <table><tr><td>Up to 2500 kVA</td><td>11 kV</td></tr><tr><td>2501 kVA to 10,000 kVA</td><td>33 kV</td></tr><tr><td>Above 10,000 kVA</td><td>132 kV or 220 kV as may be decided by Licensee</td></tr></table> <p>The above para specifies the voltages for extending supply based on CMD for consumers who 'seek' supply, but not the tariff chargeable at those CMDs.</p> <p>The Tariffs determined in the Tariff orders of Hon'ble Commission under HT Categories are 'Voltage wise tariffs' and not 'demand wise tariffs', it can be seen from the table 6.20 of RST:</p>	Up to 1500 kVA	11 kV	1501 kVA to 5,000 kVA	33 kv	Above 5,000 kVA	132 kV or 220 kV as may be decided by Licensee	Up to 2500 kVA	11 kV	2501 kVA to 10,000 kVA	33 kV	Above 10,000 kVA	132 kV or 220 kV as may be decided by Licensee	
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			<div>Table 6.20: Retail Supply Tariff Schedule for FY 2022-23</div> <table><tr><th rowspan="2">Category</th><th colspan="2">Fixed/Demand Charge (Rs/KVA/Month)</th><th>Energy Charge (Rs/Unit)</th></tr><tr><th>Unit</th><th>Rate</th><th>SPDCL</th></tr><tr><td>HT I(A) Industry General</td><td></td><td></td><td></td></tr><tr><td>11 kV</td><td>kVA</td><td>475</td><td>7.65</td></tr><tr><td>33 kV</td><td>kVA</td><td>475</td><td>7.15</td></tr><tr><td>132 kV and above</td><td>kVA</td><td>475</td><td>6.65</td></tr></table> <div>Therefore, the DISCOMs should charge the tariff as per the voltage wise Tariffs determined in the Retail Supply Tariff orders even for the existing consumers connected at 132kV/33kV level and Derated their load below 1500KVA.</div>	Category	Fixed/Demand Charge (Rs/KVA/Month)		Energy Charge (Rs/Unit)	Unit	Rate	SPDCL	HT I(A) Industry General				11 kV	kVA	475	7.65	33 kV	kVA	475	7.15	132 kV and above	kVA	475	6.65	<div>The proposed sub-clause may be modified as given: “The DISCOM shall levy the tariff as per the applicable/ specified voltage as per GTCS and NOT as per the actual supply voltage”. Deration of Contracted Demand shall be allowed upto minimum of the Contracted Demand of the actual voltage availed by the consumer.</div>
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2. Response to GMR Hyderabad International Airport Ltd.:

S. No.	Existing Regulation (GTCS Consolidated)	Draft Amendment GTCS 2022 (New)	Comments from GMR Hyderabad	Response by TSSPDCL																																				
1	<p>HT consumers intending to avail supply through independent feeders from substation.</p> <p>For total Contracted Demand by applicants seeking HT supply through independent feeders from the sub-stations, with the Company and all other sources like APGPCL, Mini Hydel, Wind Power, MPPs, Co-Generating Plants etc shall be:</p> <table><tr><th>Contracted Demand</th><th>Voltage level</th></tr><tr><td>Upto 2500 kVA</td><td>11 kV</td></tr><tr><td>2501 kVA to 10000 kVA</td><td>33 kV</td></tr><tr><td>Above 10000 kVA</td><td>132 kV or 220 kV</td></tr></table>	Contracted Demand	Voltage level	Upto 2500 kVA	11 kV	2501 kVA to 10000 kVA	33 kV	Above 10000 kVA	132 kV or 220 kV	<p>HT consumers intending to avail supply through independent feeders from substation.</p> <p>For total Contracted Demand with the Company and all other sources like APGPCL, Mini Hydel, Wind Power, MPPs, Co-Generating Plants etc shall be:</p> <table><tr><th>Contracted Demand</th><th>Voltage level</th></tr><tr><td>Upto 3000 kVA</td><td>11 kV</td></tr><tr><td>3001 kVA to 5000 kVA</td><td>33 kV</td></tr><tr><td>5001 kVA to 20000 kVA</td><td>33 kV or 132 kV</td></tr><tr><td>Above 20000 kVA</td><td>132 kV and above</td></tr></table>	Contracted Demand	Voltage level	Upto 3000 kVA	11 kV	3001 kVA to 5000 kVA	33 kV	5001 kVA to 20000 kVA	33 kV or 132 kV	Above 20000 kVA	132 kV and above	<p><u>1) Regarding Changes in Contacted Demand for Dedicated feeders under Clause 3.2.2.2</u></p> <p>We noticed that changes to contracted demand are being proposed for supply under Dedicated feeders.</p> <p>Clause 3.2.2.2 under existing GTCS</p> <table><tr><th>Contracted Demand</th><th>Voltage Level</th></tr><tr><td>Up to 2500 kVA</td><td>11 KV</td></tr><tr><td>2501 KVA to 10000 kVA</td><td>33 KV</td></tr><tr><td>Above 10000 kVA</td><td>132 KV or 220 KV</td></tr></table> <p>Draft Amendment to Clause 3.2.2.2 as provided by the Hon’ble TSERC</p> <table><tr><th>Contracted Demand</th><th>Voltage level</th></tr><tr><td>Up to 3000 kVA</td><td>11 kV</td></tr><tr><td>3001 kVA to 5000 kVA</td><td>33 kV</td></tr><tr><td>5001 kVA to 20000 kVA</td><td>33 kV or 132 kV</td></tr><tr><td>Above 20000 kVA</td><td>132 kV and above</td></tr></table> <p>it may be kindly noted that dedicated feeders are mutually beneficial to consumer as well as DISCOMs in terms of operational feasibility, efficient power distribution with minimal fosses and ease in energy audit.</p> <p>It may also be kindly noted that due to the State Government’s proactive policies and efforts of State Power Utilities ensuring availability of reliable power 24*7, many reputed institutions and industries are being established within the state of Telangana and most of them are opting supply through dedicated feeders.</p> <p>While so, requirements for every institution/facility/industry availing power on dedicated feeder are different and unique in respect to their requirement of loads and</p>	Contracted Demand	Voltage Level	Up to 2500 kVA	11 KV	2501 KVA to 10000 kVA	33 KV	Above 10000 kVA	132 KV or 220 KV	Contracted Demand	Voltage level	Up to 3000 kVA	11 kV	3001 kVA to 5000 kVA	33 kV	5001 kVA to 20000 kVA	33 kV or 132 kV	Above 20000 kVA	132 kV and above	
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		<p>voltage levels, which purely depend on their operational requirements. Our Sate is attracting investments in areas of Manufacturing. Pharma, Infrastructure projects, Data Centres, SEZs, major Indusial Parks etc. such as Pharma City, NMIMZ, textile Park, Food Processing Parks etc.</p> <p>In view of the above, flexibility should be given to consumers availing dedicated feeders for choice of their voltage level without stressing on threshold levels of contracted demand as far as possible, which is also a practise in other progressive sates.</p> <p>Hence, we request Hon’ble State Commission to permit the consumers availing dedicated feeder to opt for next higher voltage of supply, based on his requirements. Even though the contracted demand is less than the specified limit as being proposed now.</p>	<p>Approvals shall be given for the Contracted Demands strictly as per the voltage levels specified in GTCS for prospective consumers without any deviations.</p> <p>“In case of Consumer categories, for whom the voltages-wise tariff is applicable, the Company shall levy the tariff as per the applicable specified voltage and NOT as per the actual supply voltage”.</p> <p>Deration of Contracted Demand shall be allowed upto minimum of the Contracted Demand of the actual voltage availed by the consumer.</p>																									
		<p><u>Our Suggestion for amendment to Clause 3.2.2.2:</u></p> <table><tr><th>Contracted Demand</th><th>Suggested Voltage Level</th><th>Remarks</th></tr><tr><td>Up to 3000 kVA</td><td>11 kV or 33 kV</td><td>Consumer shall be allowed to for 33 KV based on his requirement and availability of infrastructure nearby,</td></tr><tr><td>3001 kVA to 5000 kVA</td><td>33 kV</td><td></td></tr><tr><td>5001 kVA to 20000 kVA</td><td>132 kV/220kV</td><td>Consumer shall be allowed to for 220 KV based on his requirement and availability of infrastructure nearby,</td></tr><tr><td>Above 20000</td><td>132 kV & above</td><td></td></tr></table>	Contracted Demand	Suggested Voltage Level	Remarks	Up to 3000 kVA	11 kV or 33 kV	Consumer shall be allowed to for 33 KV based on his requirement and availability of infrastructure nearby,	3001 kVA to 5000 kVA	33 kV		5001 kVA to 20000 kVA	132 kV/220kV	Consumer shall be allowed to for 220 KV based on his requirement and availability of infrastructure nearby,	Above 20000	132 kV & above		<p><u>HT consumers intending to avail supply through independent feeders from substation:</u>For total Contracted Demand with the Company and all other sources like APGPCL, Mini Hydel, Wind Power, MPPs, Co-Generating Plants etc shall be:</p> <p>The table for the contracted demand and voltage level may be modified as given below:</p> <table><tr><th>Contracted Demand</th><th>Voltage level</th></tr><tr><td>Upto 3000 kVA</td><td>11 kV</td></tr><tr><td>3001 kVA to 10000 kVA</td><td>33 kV</td></tr><tr><td>10001 kVA to 20000 kVA</td><td>33 kV or 132 KV or above</td></tr><tr><td>20000 kVA and above</td><td>132 kV or above</td></tr></table>	Contracted Demand	Voltage level	Upto 3000 kVA	11 kV	3001 kVA to 10000 kVA	33 kV	10001 kVA to 20000 kVA	33 kV or 132 KV or above	20000 kVA and above	132 kV or above
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			<p><u>2) Regarding existing consumers dedicated feeder supply under prevailing GTCS Clause 3.2.2.2:</u></p> <p>We noticed that there is no mention on how the existing consumers availing dedicated feeder supply will be categorized in lieu of the proposed changes to Clause 3.2.2.2 of the GTCS.</p> <p>The existing consumers mostly with Contract Demand above 10000 kVA who presently are availing 220 kV supply through dedicated feeders are as per prevailing GTCS are now proposed to be classified under 33 kV or 132 kV only. The option of 220 kV is not mentioned for them.</p> <p><u>For these existing consumers with loads above 10000 kVA on dedicated feeders with 220 kV supply, as they already incurred costs on their feeders, they shall be allowed to continue on 220 kV for present and as well as for future load enhancement up to 20000 kVA.</u></p> <p>Similar situation will be faced by existing consumers with below 3000 kVA load connected at 33 kV voltage, who will now be categorized under 11kV voltage as per the proposed amended GTCS.</p> <p>For such existing consumers, they shall be continued to avail supply at their existing connected voltages as per previous GTCS. Further, if any existing consumer shall want to change his voltage level (either to higher or lower voltage) as per the proposed amendment to Clause 3.2.2.2, the consumer shall be permitted to do so.</p> <p>A suitable sub clause or clause shall be incorporated in the proposed amendments to GTCS.</p>	<p>The existing consumers may be continued to avail supply at their existing connected voltages as per previous GTCS.</p> <p>Approvals shall be given for the Contracted Demands strictly as per the voltage levels specified in amended GTCS for prospective consumers or existing consumers who desire to modify their CMD with appropriate voltages as specified above without any deviations.</p>
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2	NA	<p>In case of consumer categories, for whom the voltage-wise tariff is applicable, the Company shall levy the tariff as per the actual supply voltage.</p>	<p>a) More clarity shall be provided on sub clause vi. of 3.2.2.3 which is reproduced below</p> <p><i>vi. In case of consumer categories, for whom the voltage-wise tariff is applicable, the Company shall levy the tariff as per the actual supply voltage.</i></p> <p>The term "actual supply voltage" shall be more elaborated to avoid ambiguity in certain scenarios for existing consumers such as:</p> <ul style="list-style-type: none">• Assuming that there is an existing consumer having contracted demand of 2000 kVA 33 kV voltage (as per prevailing GTCS).• Under the proposed amendment to GTCS, this consumer will fall under supply at 11 kV.• The Commission may kindly note that the consumer has incurred infrastructure cost for 33 kV level Feeder as per previous GTCS conditions. <p>If the consumer is billed at 11 kV as per the contracted demand under proposed GTCS, then consumer will be ending up paying for 11 kV voltage inspite of availing actual supply at 33 kV level. Hence, the sub-clause vi of 3.2.2.3 may be suitably amended or clarification may be provided to remove the ambiguity.</p>	<p>“The DISCOM shall levy the tariff as per the applicable/ specified voltage as per GTCS and NOT as per the actual supply voltage”.</p>
			<p><u>Other Suggestion to clause vi:</u></p> <p><u>vi. In case of consumer categories for whom the voltage wise tariff is applicable, the Company shall levy the tariff as per their actual connected voltage. Further for the existing consumers whom the voltage wise tariff is applicable the company shall levy the tariff as per their existing actual connected voltage.</u></p> <p>b)Further, the following additional clauses may be added:</p> <p>viii. Supply to consumers at voltage higher than the limit specified above, should continue and in case their requirement increases, shall be allowed to continue at the that voltage level or shift to the next higher voltage level as consumer requirement.</p> <p>ix. Supply to existing consumers at voltage lower than the limit specified above, shall continue and in case their load requirement increases, the above specified load limit will be applicable.x. The licensee may, depending upon the technical conditions of the distribution system, give supply at a voltage and phase other than the classification of supply in clause 3.2.2.1 or 3.2.2.2 of this Code, subject to the commission’s approval.</p>	<p>“For the existing consumers, the DISCOM shall levy the tariff as per the applicable/ specified voltage as per previous GTCS and NOT as per the actual supply voltage“.</p>

3. Response to Sitaram Spinners Private Limited (SSPL):

S. No.	Existing Regulation (GTCS Consolidated)	Draft Amendment GTCS 2022 (New)	Comments from SSPL	Response by TSSPDCL																				
1	<p>HT consumers intending to avail supply on common feeders:</p> <p>For total Contracted Demand with the Company and all other sources like APGPCL, Mini Hydel, Wind Power, MPPs, Co-Generating Plants etc:</p> <table><tr><th>Contracted Demand</th><th>Voltage level</th></tr><tr><td>Upto 1500 kVA</td><td>11 kV</td></tr><tr><td>1501 kVA to 5000 kVA</td><td>33 kV</td></tr><tr><td>Above 5000 kVA</td><td>132 kV or 220 kV as may be decided by the Company</td></tr></table>	Contracted Demand	Voltage level	Upto 1500 kVA	11 kV	1501 kVA to 5000 kVA	33 kV	Above 5000 kVA	132 kV or 220 kV as may be decided by the Company	<p>HT consumers intending to avail supply on common feeders:</p> <p>For total Contracted Demand with the Company and all other sources like APGPCL, Mini Hydel, Wind Power, MPPs, Co-Generating Plants etc:</p> <table><tr><th>Contracted Demand</th><th>Voltage level</th></tr><tr><td>Upto 1500 kVA</td><td>11 kV</td></tr><tr><td>1501 kVA to 2500 kVA</td><td>11 kV or 33 kV</td></tr><tr><td>2501 kVA to 5000 kVA</td><td>33 kV</td></tr><tr><td>5001 kVA to 10000 kVA</td><td>33 kV or 132 kV</td></tr><tr><td>Above 10000</td><td>132 kV and above</td></tr></table>	Contracted Demand	Voltage level	Upto 1500 kVA	11 kV	1501 kVA to 2500 kVA	11 kV or 33 kV	2501 kVA to 5000 kVA	33 kV	5001 kVA to 10000 kVA	33 kV or 132 kV	Above 10000	132 kV and above	<p>1.Clause 3.2.2.1 HT consumers intending to avail supply on common feeders:</p> <p>Common feeders at 132kV level are not available in Telangana. The common feeders at 132kV should be available abundantly so that the consumers having 5001 kVA and above contracted demand can able to shift to 132kV from existing 33kV level, otherwise there is no meaning of having such clause without the availability of common feeders at 132 kV level in the state.</p> <p>The details of such common feeders and available capacities at individual substations shall be made available at the DISCOMs website.</p>	<p>It is not feasible to supply of 1501 KVA to 2500 KVA contracted demand at 11 KV and 5,001 KVA to 10,000 KVA contracted demand at 33 KV on common/mixed/express feeders. Hence, the proposed change in the sub-clause 3.2.2.1/3.2.2.3 may be dropped/withdrawn. Further, it can be retained as it was originally in consolidated GTCS.</p> <p>Hence no Changes shall be made to the existing Contracted maximum demands Vs Voltage levels on common feeders due to multiple reasons such as huge power supply interruptions, significant expenditure, longer time required for replacement of conductor, change of insulators, cross arms, structures (Poles, Towers) wherever required, erection of intermediate poles, etc.</p>
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HT consumers intending to avail supply through independent feeders from substation.

For total Contracted Demand by applicants seeking HT supply through independent feeders from the sub-stations, with the Company and all other sources like APGPCL, Mini Hydel, Wind Power, MPPs, Co-Generating Plants etc shall be:

Contracted Demand	Voltage
Upto 2500 kVA	11 kV
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HT consumers intending to avail supply through independent feeders from substation.

For total Contracted Demand with the Company and all other sources like APGPCL, Mini Hydel, Wind Power, MPPs, Co-Generating Plants etc shall be:

Contracted Demand	Voltage level
Upto 3000 kVA	11 kV
3001 kVA to 5000 kVA	33 kV
5001 kVA to 20000 kVA	33 kV or 132 kV
20000 kVA and above	132 kV and above

2.Clause 3.2.2.2 HT consumers intending to avail supply through dedicated feeders

As per the draft amendment, the consumers having contracted demand 5001 KVA and above can opt for supply connection at 33kV or 132kV level through independent feeder. The below provision may be added

"The existing consumers at 33kV level having CMD of 5001 KVA and above may opt for132kV network"

It will however be subject to feasibility and contribution of cost of extension by the consumer as per GTCS and as per the Regulations of the Hon'ble Commission. The DISCOMs should freely allow the consumer to choose the supply voltage level at least in case of dedicated feeder as the entire cost of the line and associated cost shall be borne by the consumer.

Voltage wise cost of supply for HT Cat-IA for FY 2022-23 are as below

Table 5-1 of Tariff order cost of service for FY 2022-23 (Rs/kwh)

HT-IA	Claimed		Approved		
Consumer Category	SPDCL	NPDCL	SPDCL	NPDCL	STATE
11 kV	6.78	5.88	7.64	9.13	7.9
33 kv	5.82	5.37	5.76	5.96	5.77
132 kV	5.29	4.96	5.01	5.29	5.05

It may please be seen that the cost of supply at 132kV level is lesser by Rs. 0.75 /unit w.r.t. cost of supply at 33kV.

Therefore, the Hon'ble commission through its rules/Regulations shall ensure the power supply at higher voltages in the interest of efficient transmission & distribution of electricity and in the overall interest of efficient use of energy.

HT consumers intending to avail supply through independent feeders from substation may be modified as follows.

For total Contracted Demand with the Company and all other sources like APGPCL, Mini Hydel, Wind Power, MPPs, Co-Generating Plants etc shall be

The table for the contracted demand and voltage level may be modified as given below:

Contracted Demand	Voltage level
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Approvals shall be given for the Contracted Demands strictly as per the voltage levels specified in GTCS for prospective consumers or existing consumers who desire to modify their CMD with appropriate voltages as specified above without any deviations.

4. Response to Mr. S.Surya Prakasa Rao:

S. No.	Existing Regulation (GTCS Consolidated)	Draft Amendment GTCS 2022 (New)	Comments from Mr. S. S. Rao	Response by TSSPDCL
1	NA	The company will extend the power supply capacities subject to technical feasibility	1. The relevant parameters to be considered for technical suitability mentioned in 3.2.2.3 (i), may be specified in the form of tables as done in APERC proceedings dt.6-1-2016 in a similar matter.	No Comment
2	NA	In case of consumer categories, for whom the voltage-wise tariff is applicable, the Company shall levy the tariff as per the actual supply voltage.	<p>2. It is presumed that as per clause 3.2.2.3 (vi), if a H.T consumer with CMD below 1500 kva who has to avail supply at 11kv, actually avails supply at 33kv, he will be charged tariffs applicable for 33 kv supply.</p> <p>In the event, it's desirable to modify the clause suitably to convey the meaning that such of the consumers who avail supply at a voltage higher than the specified voltages with specific approval of Discoms, will be charged on the basis of actual supply voltage.</p> <p>This will automatically cover the deterrents for availing supply at a lesser voltage as per the conditions of the relevant Tariff Order apart from the normal tariff applicable for actual supply voltage.</p>	Approvals shall be given for the Contracted Demands strictly as per the voltage levels specified in GTCS for prospective consumers or existing consumers who desire to modify their CMD with appropriate voltages as specified in GTCS without any deviations.
3	NA	NA	3. The concept of 'express feeders' brought in by APERC in its proceedings dt.11th June 2017 may also be considered with lesser complexities, so to facilitate development of industrial clusters wherever there's potential.	No Comment

