

SOUTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED



RESPONSES TO OBJECTIONS / SUGGESTIONS

On

ARR & Tariff Filings Proposal of Retail Supply Business for FY 2018-19

INDEX

S.No.	Name and Address of the Objector	Pg.No.
1.	<u>Y. ChandrashekarRao</u> , Advocate, Plot No.31, SLNS Colony Hyd Road, Nalgonda-508001, Cell No:- 9441280831	5
2.	<u>SwamyJaganmayananda</u> , Husnabad Village, KodangalMandalVikarabad District, Telangana State.	10
3.	<u>M. VenugopalRao</u> , Senior Journalist & Convener, Centre for power studies, H.No. 7-1-408 to 413, F 203, Sri Saidarsan Residency, Balkampet Road, Ameerpet, Hyderabad-500 016 e-mail vrmummareddi@gmail.com	17
4.	<u>G.V. MallikarjunaRao</u> , Chief Electrical Districution Engineer, South Central Railway, Secunderabad. E-mail cede@scr.railnet.gov.in	33
5.	<u>M. Thimma Reddy</u> , Convenor, People's Monitoring Group on Electricity Regulation 139, Kakatiya Nagar, Hyd-500 008, e-mail thimmanna_m@rediffmail.com	38
6.	<u>GMR</u> Aero towers, Rajiv Gandhi International Airport , Shamshabad, Hyderabad 500 018. Telangana State, India, www.hyderabad.aero	55
7	<u>T. Balraj</u> , Ammapur village, moinabad mandal, RR district	57
8	<u>Madi Reddy</u> Raji Reddy, 20-160/1/1, R-13. Nagar, shamshabad, Ranga Reddy, Pin 501218. Cell No. 9848252628.	58
9	<u>B. Ramulu & G. Srinivas Reddy</u> , Amdapur Village, Moinabad mandal, RR-District, Cell. No. 9010404155	64
10	<u>K. Vittal Reddy</u> , Amdapur Village, Moinabad Mandal, RR-District Cell.no. 9505028454	65
11	<u>Y. Balwanth Reddy</u> , Y Balamani, Y. Penta Reddy, Darshan Reddy, Y. Chandra Shekar Reddy Amdapur Village Moinabad RR Dist.	66
12	<u>The Engineer-in-Chief</u> (Irrigation), I&CAD Department,, 2 nd Floor, Jalsoudha, Errum Manzil, Hyd-500 082 e-mail enc_major@yahoo.co.in	67
13	<u>GMR Vemagiri Power Generation Limited</u> , Corporate office, Airport Building 302, 1 st floor, New Shakti Bhawan, New Udaan Bhawan Complex, Near Terminal 3, IGI Airport New Delhi-110037.	71
14	<u>Bimani Venkataiah</u> , Gudla survey village, Biginpalli Mandal, Nagarkurnool District Cell no. 9490091915.	73
15	<u>Gurujala Srinivas Reddy</u> , Jakkapur Village, Siddipet Mandal, Siddipet District. Cell.No. 9441247367	74
16	<u>A.Anjaneyulu</u> , Mallayapalli village, Dubbaka Mandal, Siddipet District Cell No. 9032695545	75
17	<u>Laxmi Kanth</u> Subash Road, narayanpet mandal, mahaboob nagar district cell.no. 9440070142	76
18	<u>Manik Reddy</u> , Naragudem Village, pulapalli, Nawabpet, Vikarabad District 501101.	77
19	<u>Venkoba</u> , Subash Road, Narayanpet Mandal, Mahabubnagar district, Cell No. 7893458957	78
20	<u>B. Malla Reddy</u> , Tuniki Bollaram Village, Mulugu Mandal, Siddipet District. Cell.No. 9640530678	79
21	<u>Srikanth Reddy</u> , Doulapur Village, Papanna peta Mandal, Medak District 502331, Cell.No. 9948090218	80

S.No.	Name and Address of the Objector	Pg.No.
22	PanyalaVenkat Reddy , 1-10-1/2/39/95, Sri Chakra Puram, Kapra, Kushaiguda, Hyderabad -500 062 cell.No. 9491594055	81
23	HanmanthRao , Maadaram Village, Shamirpet Mandal, Medchal Cell.No. 9246885864	84
24	D. Ramu , H.No. 2-1-174,175, Nallakunta Hyderabad, Cell.No. 9441901736.	85
25	Kancharla Soma Reddy , Merlagadda Tanda village, peruru, anumala Mandal, Nalgonda District Cell.No. 9492863465	86
26	Telangana Solar Open Access Developers Assciation , 8-3-224/4/A, pt no. 11&12, Sy.no. 01, room No. 12, Madhura Nagar, Yousufguda, Hyderabad-500 038	87
27	Arhyama Solar Power Ltd , Room No. 201, & 202, 8-3-224/4/A/11 & 12, F/4, Yousuf Guda main road, Madhuranagar Hyderabad-38 e-mail arhyamasolarpower@gmail.com	88
28	M.Kodanda Reddy , Chairman, Kesan Mazdur congres, Gandhi Bhavan, Hyderabad- 500001.	89
29	Solnova Power Pvt Ltd , Vaishnavi;s Tanmai Plaza, 4 th Floor, Gachibowli, X Road beside flyover, Hyderabad-500032, www.solnovapower.com	103
30	Value Labs , Plot No. 41, HITEC city, Phase-Ii Madhapur, Hyderabad – 500 081 india, Ph: 91-040 6623-9000	105
31	Sitapuram Power Limited , Corporate Office 8-2-293/82/431/A, Road No. 22, Jublee hills. Hyderabad – 500 033 Tel: +91-40-23559922-25	107
32	Bhagyanagar India Limited , 5 th Floor Surya Towers, Sardar patel Road, sec-500 003 telangana india Tel: +91-40-27845119, e-mail bil@surana.com	109
33	Surana Solar Systems PVt Ltd , 5 th Floor Surya Towers, Sardar patel Road, sec-500 003 telangana india , ph :- 44665700 Tel: +91-40-27848851, e-mail solar@surana.com	111
34	Indian Solar Power Producers Association , 5 th floor, Surya Towers, Sardar patel Road, Sec-500 003, Tel: +91-40-27845119 e-mail surana@surana.com	113
35	G. Arunathi , Amdapur (village), Moinabad Mandal, RR-District.8639111751	115
36	Y. Narsimha Reddy , Amdapur (village), Moinabad Mandal, RR-District, Cell.no. 9640661357	116
37	G. Buchi Reddy , Amdapur (village), Moinabad Mandal, RR-District	117
38	M. Penta Reddy , Amdapur (village), Moinabad Mandal, RR-District Cell.No. 9390084314	118
39	G.karnakar Reddy , Amdapur (village), Moinabad Mandal, RR-District cell.no. 9666293640	119
40	G. Shankar Reddy , Amdapur (village), Moinabad Mandal, RR-District cell.no	120
41	G. Satyanarayana Amdapur (village), Moinabad Mandal, RR-District cell.no. 9849888787	121
42	G. Sai Reddy , Amdapur (village), Moinabad Mandal, RR-District cell.No. 9849234664.	122

S.No.	Name and Address of the Objector	Pg.No.
43	<u>Hindustan Petroleum Corporation</u> Limited, South Central zone, Parisram Bhavan, 7th Floor, 5-9-58/B, Fateh Maidan Road, Basheer Bagh, Hyd-500 004	123
44	<u>The Federation of Telangana and Andhra Pradesh Chambers of Commerce and Industry</u>, Federation House, FAPCII Marg, Red Hills, Hyderabad. E-mail : info@ftapcci.com	124
45	<u>P. Chandrakanth Sharma</u>, Management Consultant & Advocate (national Institute of Technology (Warangal)Ex Chief General Manager (HRD), Singareni Collieries company Ltd. A.P, Cell.No: 86885 36900, 93900 36900. E-mail pcksharma@gmail.com	138
46	<u>BSNL</u> Sr. Chief Engineer (E) BSNL Electrical Zone, 6th floor, BSNl Bhavan Adarsh Nagar, Hyderabad-500 063	141
47	<u>M. Sridhar Reddy</u>, H.No. 2-1-174 & 175, Rajput Residency, Nallakunta, Hyderabad-500 044 Cell.No. 9866381090.	144
48	<u>K. Krishna Reddy</u>, Netaji Road, Jedcherla, Mahabubnagar. Cell.No. 9885752784.	145
49	<u>Malla Reddy</u> BKS, Kottagadi village, Vikarabad Mandal, Vikarabad District Cell.No. 9505502440	146
50	<u>Indian Energy Exchange Limited</u>, Corporate Office: Unit No. 3,4,5&6, Plot No.7, Fourth Floor, TdI Centre, District Centre, Jasola, New Delhi - 110025 Tel: +91-11-4300 4000	147
51	<u>M Penta Reddy</u>, Kasimcherla(Vi), Amdapur G.P, Moinabad (M), Ranga Reddy (Dist), Cell No: 9390084314	160
52	<u>P.Anji Reddy</u> H.No 2-1-174 & 175, Flat No. 4-2, Nallakunta - 44	161
53	<u>J Sri Ranga Rao</u>, H.No.2-2-18/18/7, Flat No. 503 C-29, D.D Colony Hyderabad - 500013	161
54	<u>D. Ravi</u> , Bharatiya Kisan Sangam northern Telangana Vidyut pramuk, Cell.No. 9908295502	172
55	<u>M. Sridhar Reddy</u>, H.No. 2-1-174 & 175, Rajput Residency, Nallakunta, Hyderabad-500 044 Cell.No. 9866381090.	161
56	<u>Yantra Green Power Pvt. Ltd.</u>, North End Building, Road No. 2, Banjara Hills, Hyderabad-500 034	173
57	<u>COSMIC Power solutions Ltd.</u>, Plot No. 347/1, Road No. 23, Jubilee Hills, Hyderabad- 500 033 e-mail info@cosmic-powersolutions.com	173
58	<u>Peritus Corporation Private Ltd.</u>, 601, Cyber Heights, Plot # 13, Road No. 2, Banjara Hills, Hyderabad- 500034	173
59	<u>Repal Green Power Private Ltd.</u> , 2-9/5/6, First floor, Trendz Venkata Sai Gateway, Green Land Colony, Gachibowli, Hyd. -500 032 e-mail sviswanathan@vibrantenergyholdings.com	173
60	<u>President,Rice Millers Association Telangana State</u>, Flat No. 108, Taj Enclave, Beside Meera Theatre, Khairatabad, Hyd- 500 004 e-mail rmats.717@gmail.com	175
61	<u>The Managing Director, Bus Bhavan</u>, Mushirabad, hyderabad, Telangana State. Off &Fax :040-27601313 & 040-27611122. Email: jmd@tsrtc.telangana.gov.in e-mail jmd@tsrtc.telangana.gov.in	177

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1. Y. ChandrashekarRao, Advocate, Plot No.31, SLNS Colony Hyd Road, Nalgonda-508001, CellNo:- 9441280831		
i.	<p><u>Domestic Service at Construction:</u> Some of our staff members are insisting to apply under Category-II commercial service, for construction of house and advising to get conversion into category-I after gruhapravesham. This seems to be totally not correct; you may demand to apply for commercial service, if the construction is taken-up by developer or contractors, who are doing real estate business. But spare and spare common men like me to go for construction of house at the fag end of life, by releasing supply of power under category-I ie., domestic, by giving clear instruction</p>	For construction of houses less than 10 meters height, service is being released under LT-II category, and after completing the construction of house it is being converted into relevant category as per utilization.
ii.	<p><u>Clean & Green</u> Our department is giving much importance to this clean and green campaign. But it is implementing in reverse manner. Our staff attending clearing the trees, during post-monsoon and pre-monsoon periods, which are in the way of our live wires. And developing greenery at transformer structure, by allowing bushes to grow and to touch LT lines. But my suggestion is to send live wires, through hard PVC plastic pipes, and save trees to the extent possible, and minimize the tree clearance. This will save our money and also time permanently and it is a support of the nature.</p> <p>Sir, in the same way pre-monsoon and post-monsoon clearance work may be taken up at transformer structure, on war footing and minimize transformer failures on one hand and our money for repairs of failed DTrs., on other.</p>	<p>TS Discoms are following standard operation and maintenance practices as per the Indian Electricity Rules, CEA Rules. There is minimum clearance to be maintained between the tree branches and live power lines.</p> <p>Pre-monsoon and Post-monsoon works are taken up licensee in order to prevent any interruptions/ break downs in supply of consumers. Pre-monsoon and post-monsoon works are also very important from a perspective of preventing any accidents.</p>

iii.	<p><u>Special Category to Vyshya community:</u> Our CMD is dare enough to open pandora’s Box, by creating a separate category for barberhsops of nai-brahmans, whose profession is hair cutting. The same benefit may also be extended to my community, ie.,AryaVyshya, whose profession is kirana business, particularly in rural areas, where dwelling and kirana shop are being run under one roof. This will save our community from having two services, one for small kirana shop under Cat-II, and another for dwelling under Cat.I.</p>	<p>In the Tariff Order 2016-17, the HonbleCommisison has created a sub category for Hair Cutting Saloons under LT Category –II Non-Domestic upon receipt of Commitment in the form of subsidy from the Government of Telangana to extend concessional tariffs to Hair cutting saloons with consumption upto 200 units/month.</p>
iv.	<p><u>Construction of shopping complex</u> We are having large premises in all areas, particularly in Nalgonda, Koda, AlairKolanupaka, KondaMallepally, Suryapet and at various othe places, through out the districts. Now these areas/places became commercial centers, in these towns and are subjecting to encroachment, by various people. Nalgonda Municipality occupied our land and constructed Sulabh Complex at our circle office.</p> <p>To avoid such encroachments and to protest premises, even the Superintendent of Police, Nalgonda, took up construction of shops on the road side. I request to take up such construction of shops having inside and outside shutters. We can utilize these shops, when we require from inside and also can let out from outside, when not required. This will bring substantial and permanent income onone side, and saves our properties from encroachments.</p>	<p>It is proposed to construct compound wall for all the assets belonging to TSSPDCL to safeguard the boundaries and to avoid the encroachment of areas/places of TSSPDCL</p>

<p>v.</p>	<p><u>Disposal Waste materials:</u></p> <p>There are number of off road vehicles, in our district at various places, particularly in Nalgonda town, Suryapet, Alair and other places, for a long time occupying large space. It is causing parking problem to the present-vehicles, and to the staff and also to the consumers. On the other, the value/cost of these vehicles is reducing day by day. If these are sold long back, we might have got lakhs of rupees, but now they are worn out. Even now I request your kind honour to order for early disposal, in a time bound programme, as one time settlement, relaxing various bottlenecks in the auctioning process.</p> <p>Likewise there are number of typewriters, printers, computers, reno machines etc., in our offices, waiting for disposal. They may please be auctioned nad realize money at the earliest.</p>	<p>The suggestion given is considered and instructions are being issued to all the circles to submit the survey reports of the scrap materials in the concerned stores to P&MM wing, corporate office for conducting e-auction with a time bound period.</p> <p>For computers, printers etc., instructions have been issued to circle offices for conducting auction.</p>
<p>vi.</p>	<p><u>Auto credit of CC debit bills:</u></p> <p>Decision may please be taken to get auto credit of CC bills, format he Savings bank accounts of the consumers, at their option with in a week's time from the date of issue of bills or 21st of the month, as limitation, with SMS message. This will save time of the consumers on one hand, cc bills in this process, will reduce the expenditure to the department. Interruption of powers supply may also been informed to the consumers of the area by SMS, which will give an idea to the consumers.</p>	<p>It is to submit that the facility of auto debit of CC bills from the consumers saving bank accounts at their options within a week time from the date of issue of bills and before due date of payment has been already implemented in TSSPDCL since 2003 through the service providers. Such services are called as ECS and NACH¹ Services. Generally, this type of services will be provided by the Bankers as per the rules and regulations of RBI duly associated with their service providers.</p> <p>Presently, TSSPDCL has appointed two (2) Companies for making collections of LT Electricity Bills through ECS and NACH Services, viz., M/s India Ideas.com Ltd. And M/s TechProcess Pvt. Ltd. These two (2) Companies have been providing ECS/NACH services duly accompanying with around 70-80 Banks for arranging billing data, auto debit of CC bills from the consumers saving bank accounts and posting payment transaction into consumers ledger. This information will be sent to individual consumers through SMS. In Order to educate the consumers a message box will be displayed on TSSPDCL Website as well as service providers' Website.</p>

vii.	<p><u>Retaining of retirement benefits:</u></p> <p>Most of the employees, who are receiving terminal benefits, wishes to retain their terminal benefits with the department itself, as fixed deposits, at the interest rates applicable to GPF savings, and to get interest along with monthly pension or quarterly or half yearly. This will facilitate their problem with IT department and other saving agencies.</p> <p>The department will also get some portion of capital works, at reasonable rate of interest.</p>	<p>Neither APSEB PF regulations nor the Trust Deed Agreement between the Company and the PF Trust had stipulated on retention of PF Subscribers fund on retirement and subsequent application thereof and as advised by the applicant, utilization of the fund on the Capital works of the company will violate the clause No. 24 of the Trust Deed. The Clause No. 24 states that “subject to the Provisions contained in these presents, the funds shall be invested and managed by the Board of Trustees in accordance with applicable law including the Companies Act, 2013, the funds efficiency and in accordance with the terms contained in these presents and shall disburse the Terminal Benefits to the Subscribers”.</p> <p>In view of the above circumstances, it is not possible to retain the retirement benefits of the subscribers of PF Trust.</p>
viii.	<p><u>Waste Purchases:</u></p> <p>Department is making waste purchases. Examples are purchasing of china meters, and providing of capacitors to agriculture services and its installation replacement, which became financial burden to the department on a large scale. Another example is purchase of Altech cell phones, though you have supplied to all officers, no body is utilizing as it is of inferior and supplied to its employees. This is a waste purchase in total. It helped to the supplier and brokers only.</p>	<p>China Meters were procured during 2002 when electrostatic meters were introduced for the first time. Later, the procurement of electrostatic meters was streamlined and is being procured as per IS standards. As a part of tender, the sample electrostatic meters will be type tested before finalization of tender. Further, the meters will be sent to NABL accredited laboratory for acceptance tests before taking them to stock.</p> <p>At present no Capacitors are procured for agricultural services by the DISCOM. No cell Phones are being provided to the employees by the Department.</p>

ix.	<p><u>Insisting of demand drafts:</u></p> <p>Our department is insisting to submit demand drafts of Rs.50/- for name change etc., works. For obtaining the demand draft, the consumer has to pay Rs.35/- as dd commission and to wait at baker for aday. Instead you can order to pay at our collection counters, even for applying new services connections nad other services. This will save commission charges and time to your valuable consumers, and also to the department employees for realization of these amounts, to the department account. It will save paper, time and unnecessary work to the employees.</p>	<p>The existing procedure is being continued as handling of cash in CSC's/ICSC's is difficult.</p>
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S.No.	Summary of Objections / Suggestions	Response of the Licensee
2. SwamyJaganmayananda, Husnabad Village, KodangalMandal, Vikarabad District, Telangana State.		
1	All the sub-stations need to be provided with extra transformers so that when the power break down takes place the additional transformers can be used for connecting the power to the transmission lines.	After formation of Telangana State, the Govt. of Telangana State had intended to give continuous quality and reliable power supply to the consumers for 9/24 hrs for which the TS Govt. and TSSPDCL has taken many types of infrastructure development activities such as, Addition of new 33/11 KV Substations, enhancement of PTRs, erection of Addl. PTRs, extension of bays, bifurcation of 11 KV feeders where carrying > 150A and bifurcation of 33 KV feeders where carrying > 250A. In addition to these works, added 76,380 DTRs in different capacities. By which therefore the TSSPDCL solved overload issues and made provisions for Addl. Loads at Substations, feeders & on DTRs. Thereby no need of extra erection of PTRs in the Substations. If any emergency arises on failure of PTR, supply will be extended from 2 nd PTR or otherwise nearby Substation feeders.
2	The supply of power to agriculture, industry and domestic need to be bifurcated and accounted for the supplies made to these sectors for the purpose of knowing which is bearing the load of power and how it is utilized.	Except agriculture services, all services viz. industry, domestic, non-domestic are provided with individual meters and the connected load & Power consumed particulars are available consumer wise, category wise in the Billing database. Accordingly, the billing and accounting is being carried out.
3	The Supplies to the Agriculture and Domestic needs are for the present are not bifurcated. There should be bifurcation of power supplies for domestic and agriculture. This will help in knowing how much power supply is made to the Agriculture Sector.	Four nos agriculture feeders have been segregated till the end of Sep'17. Huge upfront cost is required to segregate the feeders Since TSSPDCL is providing 24 hrs power supply to agricultural sector there is no need to move ahead with feeder segregation. However TSSPDCL is assessing the agriculture consumption based on robust ISI methodology approved by the Commission.
4	All the transformers need to be provided with Meters and all the illegal connection to the Borewells should be regularized by collecting required deposits and monthly charges.	UDAY MoU specifies an action plan regarding DTR metering in urban area and there is no specification regarding the metering of agricultural connections.
5	There should be pucca power Audit by the Department so that: a. The actual usage of power will be known by about 23 lakhs of borewells. b. Actual line loss which is estimated at 17% is known and	It is to submit that agricultural consumption is arrived based on effective implementation of ISI suggested methodology approved by Hon'ble TSERC in TSSPDCL. Distribution losses are arrived based on

	measure to curb the loss can be taken up.	
6	<p>The Department should know the actual consumption of power by each Unit and for the purpose it should be decided whether you need to fix meters to the feeder transformers or any other way to measure actual consumption of power.</p>	<p>recorded metered sales of both LT and HT services as per Energy Billing System, HT services data base and assessed Agl. Consumption as per ISI Methodology. Energy audit of Town and Mandal Head Quarter feeders at 11KV level is being carried out every month to find abnormal loss feeders. Apart from this Energy Audit of 33KV & 11KV Industrial feeders is being carried out on monthly basis.</p> <p><u>Methodology adopted for calculating Agl. Consumption:</u></p> <ul style="list-style-type: none"> ▪ A robust procedure for the estimation of Agriculture power Consumption based on the meter readings at selected sample Agriculture DTRs. ▪ M/s. Indian Statistical Institute has randomly picked up some Agl DTRs as samples from rural circles. For all these sampled DTRs, 0.5 S class LTCT meters were fixed, so that load surveys of the DTRs can be dumped on a monthly basis. ▪ The consumption per month at each of the sample DTR is measured. The average consumption per DTR is then estimated (i.e.) total consumption of the entire sample DTRs / Number of sample DTRs in each circle (capacity wise DTRs). ▪ Per DTR consumption in each capacity of DTR population is the basis for extrapolation of the agricultural consumption. (i.e.) total number of Agl. DTRs in the circle multiplied by the average consumption per DTR of the circle. ▪ While taking the readings of sample DTRs, MRI dumps are also taken. Only those sample DTRs showing all the voltages and currents in the three phases (called valid DTRs) are considered for assessment of consumption.

		<p>Measures taken up for reduction of T&D losses.</p> <p><u>Technical loss reduction measures:</u></p> <ul style="list-style-type: none"> Load balancing of DTRs and feeder Providing additional DTRs Providing multiple CKTs to DTRs Bifurcation of Over loaded Feeders Replacing of Conductor with higher cross section Implementing HVDS in rural and Agl network Reactive compensation by installing Capacitor banks. <p><u>Commercial loss reduction measures:</u></p> <ul style="list-style-type: none"> Sealing of services Providing High accuracy meters(Electronic) Shifting of meters to outside Replacing concealed wiring with open wiring Providing AB cable in theft prone areas Frequent intensive inspections Frequent check readings of services <p>By adopting the above measures, losses are reducing year on year.</p>
7	<p>It is not difficult to know in this technically advanced age as to what is the actual consumption of power by each and every sector and individual units. This only needs feeling of responsibility and accountability on the part of the power staff and officers which is lacking to a considerable extent in most of the staff and officers of the power sector.</p>	<p>Except agriculture services, all services viz. industry, domestic, non-domestic are provided with individual meters and the connected load & Power consumed particulars are available consumer wise, category wise in the Billing database. Accordingly, the billing and accounting is being carried out.</p>
8	<p>Of the total power generated 40% is lost due to various reasons which are best known to the department. Even in the 60% of</p>	

	power supplied billing is not done properly and the charges are not fully recovered from the users. This needs to be taken up seriously.	It is to inform that 100% of revenue billed against all services has been collected in all the Financial Years, But, revenue billed against Govt services are being realized periodically.
9	The department has to improve its internal efficiency and improve its financial position. For this purpose, there need to be strengthen the vigilance and audit departments with honest officers.	<p>TSSPDCL is taking the following measures for improving the efficiency</p> <ul style="list-style-type: none"> • Theft control by conducting intensive inspections, • proper categorization of services, • replacement of electromechanical meters with electronic meters, • shifting of meters from inside to outside of the house, • replacement of defective meters on monthly basis, • inspection of UDC and OSL services, • regularization of unauthorized services, • sealing of meters • Meter readings are being taken by IR port meters. <p>On a complaint and on suspected services vigilance wing is inspecting the areas and booking the cases. Surprise inspections are also being carried out by vigilance wing in addition to the inspection being carried out by the local field staff. The Energy Audit of Town and Mandal Head Quarter feeders at 11kV level is being carried out every month to find abnormal loss feeders. Apart from this Energy Audit of 33kV and 11kV Industrial feeders is being carried out on monthly basis.</p>
10	Officials of the Department are getting works done by the farmers in respect of erecting transformers, lying of lines etc, and claiming the bills for themselves as if they have got the works done by paying the amount to labour. Further, this kind engaging the farmers for power work is sometimes resulting in death of the farmers. This should be immediately avoided	Transportation of materials, poles, erecting DTRs will be done by the department engaged contractors only.

11	There are no toll free numbers in Vikarabad District against your claim. All the Panchyats should be provide with Toll free numbers.	Centrally operated toll free no.18004253600 is available for usage of farmers for registering electricity complaints in TSSPDCL
12	There is lot of corruption going on in the Consumer Service Centres in various forms. This should be arrested.	The details of the DD's which are being accepted during registration of the application form for availing new service connection and registering other complaints are entered into the Customer Service Centre software immediately and acknowledgements issued will be having the details of the same are displayed also. The DD's are closed on same day and sent to the DE office/ SE office in the next working in rural areas. In ICSCs, the DD's are collected by the Bank Agency's representative every day. General delays are due to the public holidays. The day wise DD's statement is visible in the software can be tallied with the registrations. However, recently the TSSPDCL has taken a initiative to install the CC cameras in all ICSC's in GHMC area.
13	The system followed in Railways or for Gas Booking should be followed in the sanction of DTR and other services so that the consumer will come to knows, the moment he pays the amount on line or otherwise, about status of his getting DTR erected and probable time for erection.	Suggestion is noted
14	The DTRs are now being taken by the Consumers for repair at their own cost and paying some amount for repairs and loading and unloading of DTR. This is against the rules of the Department. This should be checked immediately.	The transportation of failed distribution transformers is being done at the cost of DISCOM and instructions are issued to the field officers to pay the transport charges if the consumer transported the transformer.
15	The technical engineer AE and ADE are engaged for bill collection which should be discontinued forth with. They are not promptly attending to their original duties under pretext of bill collections.	The Operation AE/ADEs are equally balancing both technical and collection duties. The bill collection is also one of the important aspects for improving the Discom revenue which is essential for survival of the Company
16	The Department disconnects the line of the defaulting consumer and when he comes pay the due amounts he will be made torun form pillar to post form Accounts to Technical AE and Technical AE to JAO/ERO. In this process, the consumer is forced tonot	Upon payment of all the dues with reconnection fee at regular collection counters and EROs of TSSPDCL supply will be restored immediately.

	pay the amount due and uses the power illegally. Who is responsible? It is your system and the staff concerned with.	
17	There is no account of illegal connection and the amount of theft of power in the villages for domestic and agriculture throughout the state.	The Licensee is working on actively cutting down losses. The Vigilance (DPE) wings are available in the DISCOMs who are exclusively conducting inspections to detect theft and any other unauthorized usage of supply by the consumers. The DPE wing is conducting the intensive inspections on high loss DTR areas along with Operation Engineers for verifications of bill stopped, UDC, Nil Consumption, not in use services and meter tamper services and conducting of special raids in rampant theft areas to register theft cases. Apart from the DPE wing, the operation staff are also registering cases wherever theft is noticed. In view of the above, all the necessary steps are being taken to curb the theft of energy in TSSPDCL. Surprise inspections are also being carried out by vigilance wing. HT & LT high value services consumption pattern is being analyzed at corporate office level by DPE analysis wing.
18	There is need to have total computerization of the entire Power sector more so in domestic, agriculture etc sectors if required exclusive software may be developed so that all the loopholes in the systems can be plugged.	The TSSPDCL has developed and implemented comprehensive Software Applications for computerization in distribution of power so as to provide quality and reliable power in the domestic, agriculture sectors and enhance consumer satisfaction. Some of the major Software Applications developed and implemented in TSSPDCL are as follows:
19	There is need in increase computerization and reduce manpower deployment so as to reduce the component of salaries and wages and overhead charges in the department which will result in some surplus funds for the department.	<ol style="list-style-type: none"> 1. EBS (Energy Billing System) 2. HT Billing System 3. LT CSC (Customer Service Centres). 4. HT CSC 5. MATS (Monitoring and Tracking System) 6. EAUDIT (Energy Audit System). 7. Online Bill Payments, Online Bill Enquiry(Through Company's Website)and Billing Details through SMS. 8. CAT (Consumer Analysis Tool) 9. ERP Package (SAP) (PS,PM, MM, FI,IM, AM, CO,HR) 10. Web-Portal 11. TSSPDCL Mobile App. <p>The implementation of the above applications has created transparency in the work aspect and enabled avoiding of human errors and</p>

		<p>manipulation of data thus enhancing the data integrity. Thus it has enabled the Discom to provide better service to the consumer and enhanced consumer satisfaction,Improvement in management efficiency,improvement in the quality of Customer service, Easy monitoring of performance,easy reporting,minimization of human errors,efficient Outage Management, Asset & Work Management,Distribution Automation,Online – Billing, Collections, Arrears, Exceptions details are available online for monitoring purpose at various levels,assists in speedy disposal of consumer grievances in ERO's and better security.</p>
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S.No.	Summary of Objections / Suggestions	Response of the Licensee
3. M. VenugopalRao, Senior Journalist & Convener, Centre for power studies, H.No. 7-1-408 to 413, F 203, Sri Saidarsan Residency, Balkampet Road, Ameerpet, Hyderabad-500 016		
1	<p>The Discoms have not explained how they propose to bridge the projected revenue gap of Rs.9970.98 crore and to what extent the GoTS would provide subsidy to bridge the projected revenue gap.</p>	<p>The revenue gap has to be met through suitable support from the Government after scrutiny of the gap by Hon'ble TSERC</p>
2	<p>The projected revenue gaps of both the Discoms have to be seen in the background of tariff hike for the year 2016-17 and revised net revenue gap of Rs.5031.17 crore shown by TSSPDCL and of Rs.1793.42 crore by TSNPDCL for the year 2017-18. The substantial revised revenue gap of Rs.6824.59 crore for the year 2017-18 has to be seen in the light of no revision of tariffs for the same year. For the year 2016-17, the Discoms have not shown revised revenue gap/surplus in their subject ARR submissions; nor have they submitted their petitions for true-up/true-down claims for the same year. Since auditing of their accounts for 2016-17 must have been completed long time back, they should have filed those petitions with the Hon'ble Commission already. Going by this trend, the proposal of the Discoms not to hike tariffs for the year 2018-19 and their failure to explain how they propose to bridge the projected revenue gaps for the same year and for various other factors not taken into consideration by them for the year 2018-19, it can be asserted that they will come up with true-up claims for 2016-17, 2017-18 and the year 2018-19 also later in the post-election period. Therefore, the proposal of the Discoms not to hike tariffs for the year 2018-19 is a futile attempt to hoodwink the people of the State that there are no additional burdens of tariff hikes in the pre-election period to meet political expediency of the party-in-power. In all probability, the Discoms may be forced by the powers-that-be to postpone submission of true up claims for the year 2016-17 and the current financial year to post-poll period. It is for the Hon'ble Commission to exercise its legitimate authority to direct the Discoms to submit the same in</p>	<p>For the reasons stated by licensee there is high degree of uncertainty involved in estimating the true-ups for FY 2017-18 due to 24 hrs supply to agricultural consumers as well as LI schemes. For avoiding any undue burden on the consumers, the licensee has submitted to Hon'ble Commission for filing of true-up in the ensuing year. Further the licensee has submitted application to Hon'ble Commission for making amendments to the Principal Regulation 4 of 2005 on 11.08.2017 which is under consideration. The licensee also has submitted a prayer on treatment of agricultural sales and losses which are likely to impact the true-up.</p> <p>In view of the above, the licensee has submitted to Hon'ble Commission for filing of True-ups separately.</p>

	time and issue orders after holding public hearings promptly.									
3	<p>Since the Discoms have not made it clear as to how they would propose to bridge the projected revenue gaps for the year 2018-19, we request the Hon'ble Commission to make it clear that no true up claim would be permitted later for the revenue gap, if any, that is going to be determined by it after taking into account the subsidy amount the GoTS is willing to provide. We also request the Hon'ble Commission to make it clear to the Discoms that the remaining revenue gap, if any, to be determined for the year 2018-19 will not be treated as regulatory asset. It is to be noted here that regulatory asset can be considered only when hefty tariff hike is required and only a part of it is permitted by the Commission to avoid tariff shock to the consumers and that such revenue gap treated as regulatory asset can be permitted to be collected from the consumers in later years. Here, in the subject proposals of the Discoms, as they have not even proposed any tariff hike for the year 2018-19, the question of considering regulatory asset does not arise.</p>	The revenue gap has to be met through suitable support from the Government after scrutiny of the gap by Hon'ble TSERC								
4	<p>Both the Discoms have shown an energy requirement of 64,291 mu - 42193 mu for SPDCL and 22098 mu for NPDCL - against the projected availability of 67,573 mu for the year 2018-19. They have shown a surplus of 3282 mu. Projections made by Telangana Discoms on availability and requirement of energy in MU year-wise are given below (in brackets, quantum approved by TSERC):</p> <table border="1" data-bbox="317 1174 1319 1401"> <thead> <tr> <th>Year</th> <th>Availability</th> <th>Requirement</th> <th>Purchases approved for true-up</th> </tr> </thead> <tbody> <tr> <td>2015-16</td> <td>60,250(54,576.66)</td> <td>52,100(48,55</td> <td>45,586.94</td> </tr> </tbody> </table>	Year	Availability	Requirement	Purchases approved for true-up	2015-16	60,250(54,576.66)	52,100(48,55	45,586.94	<p>As per the Regulation No. 4 of 2005 read with first amendment regulation No. 1 of 2014, the Honble Commission has limited the agricultural sales to the Tariff Order approved quantities which resulted in lower power purchase quantities approved for True-Ups.</p> <p>BTPS Unit-I 270 MW & KTPS VII 800 MW have been considered to be commissioned during January, 2019 & October,2018 respectively.</p>
Year	Availability	Requirement	Purchases approved for true-up							
2015-16	60,250(54,576.66)	52,100(48,55	45,586.94							

		0.97)	
2016-17	64,669 (56,109.09)	54,884 (52,063)	46,843.05
2017-18	66,077.03 (58,357.73)	54,756 (52,245.39)	■

As these plants are coming up during the second half of the 2018-19, there is no significant increase in the energy availability.

In the tariff order for 2015-16, TSERC observed that “based on the month wise energy requirement and energy availability, there is no requirement of energy from bilateral/short term purchases.” However, true-up approved for 2015-16 shows that the Commission has approved true-up of 10,503.58 MU against 12,429.12 MU claimed to have been purchased in the market by the Discoms. Similarly, availability of 56,109.09 MU for the year 2016-17 approved by TSERC excluded market purchases. However, true-up approved for 2016-17 shows that the Commission has approved true-up of 2497.60 MU against 2837.43 MU claimed to have been purchased in the market by the Discoms. The Discoms have not submitted their true-up claims for 2015-16 and 2016-17, along with ARR and tariff proposals for the year 2017-18, and relevant details of true up claims are hidden from the public gaze. However, the Commission has considered the true-up/true-down claims of the Discoms provisionally in the tariff order for 2017-18. In the light of serious allegations made, as reported in the media, it is all the more important to ensure that all relevant information relating to true up claims of the Discoms - the procedure adopted for purchasing additional power and the tariffs finalised, whether such additional power was required, the conditionalities incorporated in the agreements like paying 20% of cost if contracted power is not purchased, whether other power plants with whom the Discoms had long-term PPAs were asked to

	<p>back down in order to purchase unwanted short-term power, whether NCE units had supplied power as per PPAs, etc. - is made public and a public hearing is held on the same. Concealing such vital information and not holding public hearing on true up claims of the Discoms would stifle the spirit of regulatory process of the Commission. The above table shows that availability and requirement of power have been inflated and actual purchases are even lesser. Going by this trend, the projected requirement of 64,291 mu for the year 2018-19 seems inflated, notwithstanding the claims of the Discoms for additional requirement of power for agriculture, lift irrigation schemes, metro rail project, etc., thereby showing availability of surplus at a much reduced level. When the Discoms had projected availability of 66,077.03 mu for the year 2017-18, how is it that they have projected 67,573 mu only for the year 2018-19 - an increase of just 1496 mu - despite projection of substantial addition of installed capacity of new projects during 2018-19?</p>	
5	<p>Against an installed thermal capacity of TS Genco of 4702.5 MW, the Discoms have projected availability of 18533 mu for the year 2018-19 and considered a plant load factor of 70%. When Sigareni Collieries Company Ltd. has stopped supply of coal to thermal projects of AP Genco and has been supplying additional coal to thermal projects of TS Genco, with no need for importing coal, what is the basis, as well as justification, for considering a PLF of 70% only for thermal projects of TS Genco? The Discoms, in their compliance report, responding to one of the directives of the Commission, have explained that “as per TS Genco’s letter dated 17.10.2017, the entire coal requirement for TS Genco thermal power stations are being met from M/s SCCL, which clarifies that no imported coal is being procured by TS Genco.” The Discoms have claimed that they purchase the entire generation of TS Genco. Even going by the PLF achieved by the thermal plants of</p>	<p>As per the GoTS policy, the licensee has considered 24 hrs supply to agriculture from Jan 2018. This would result in higher demand during the day time and low demand during the night time. Across India, the PLFs of thermal power plants have seen a drop due to increased penetration of renewables in the grid. The installed capacity of solar power in Telangana is amongst the highest in the country, further the 24 hrs day time to agricultural consumers could lead to increased usage of power during day time. These factors could lead to drop in the actual despatch of power from the normative levels</p> <p>Currently, RSF formats of TSERC recognized monthly energy availability and dispatch. This is different from power demand and supply. Due to low loads in night time, PLF (based on actual dispatch) will be lesser than 80%. Licensees have projected 70% PLF</p>

	<p>TS Genco over the years, there is no justification in considering their PLF at 70% only. With a capacity of 4702.5 MW, 32955.12 mu can be generated with a PLF of 80%. In other words, if TS Genco plants generate with a PLF of 80%, TS Discoms will get additional energy of 14422.12 mu. For what purpose the Discoms are projecting much reduced availability of power from TS Genco? Will they pay fixed charges for the capacity to be backed down by the projects of TS Genco?</p>	<p>(not MW availability) for running MOD at month level. However, payments to the generator are being done based actual availability during the year.</p>
6	<p>For the year 2018-19 also, the Discoms have not considered availability of power from new gas based power projects of Vemagiri, Konaseema, GVK extension and Goutami, with a total capacity of 1499 MW, on the ground that natural gas would not be available to them. If these plants generate and supply power with a PLF of 80%, TS Discoms will get 5669.47 mu as their share of 53.89%.</p>	<p>The Gas based IPPs have not been scheduling power to TS Discoms. In view of this, the licensee has not considered any power from gas based IPPs</p>
7	<p>The Discoms have projected availability of NCE to the tune of 7878.34 mu for the year 2018-19. Against the projected sale of 55683.37 mu, purchase of NCE of 7878.34 mu works out to 14.14%. If the actual sale of power comes down, the percentage of NCE will turn out to be much more. Against a minimum of 5% NCE to be purchased by the Discoms, as per the renewable power purchase order of the Hon'ble Commission, entering into long-term PPAs for purchasing NCE at higher tariffs is unwarranted for many reasons. The following points need to be considered while issuing RPPO order and in permitting the Discoms to purchase NCE afresh:</p> <p>a) To argue that RPPO stipulates only minimum of NCE to be purchased by the Discoms and that there is no maximum limit for such purchases is to misinterpret the spirit behind RPPO in a perverse way. Since the cost of non-conventional energy is very much higher and as such the Discoms may</p>	<p>a) As per Regulation 1 of 2012: Every distribution licensee shall purchase from Renewable Energy sources, a quantum of not less than 5% of its consumption of energy, during each of the years from 2012-13 to 2016-17. The actual purchases from NCE is as below</p>

not incline to purchase the same, in order to encourage generation and consumption of NCE, the system of RPPO has been introduced and implemented. The misinterpretation that since RPPO stipulates only a minimum of NCE to be purchased by the Discoms, the latter are free to purchase NCE to any extent arbitrarily, irrespective of requirement and availability of power from other sources under binding obligations of the PPAs, defeats the very spirit of the Electricity Act and the objectives of ensuring orderly development of power sector and ensuring competitive and reasonable tariffs to the consumers. The vulgar argument that consent of the Hon'ble Commission is not even required to PPAs the Discoms enter into with NCE developers or that the Hon'ble Commission has to give its consent to such PPAs automatically negates the very objective of regulatory process and defeats the very purpose of the existence of electricity regulatory commissions.

- b) The tariffs to be paid by the Discoms to NCE units are very much higher and are nowhere near the lower tariffs discovered through competitive biddings for solar and wind energy during the recent period elsewhere in the country. The average tariff for solar power is shown as Rs.5.76 per kwh and that of wind power as Rs.4.70 per kwh for the year 2018-19.
- c) The NCE units being treated as must-run ones, with no scope for backing down, and as the higher tariffs continue for the entire period of PPAs of 25 years, the Discoms are compelled to purchase the entire power generated by them, irrespective of their requirement and availability of relatively cheaper power from other sources under PPAs.

S No.	Particular	FY 2014-15	FY2015-16	FY 2016-17
1	Total Consumption in MU	33885.06	34742.02	36053.49
2	Consumption from NCE in MU	81.35	216.74	1181.25
3	RPPO in %	0.24	0.62	3.53

Hence it can be inferred from the above actual purchases is that the Discom is still not met its minimum obligation of 5%. To fulfill its obligation, Discom had made NCE procurement through a transparent process of competitive bidding. And the PPAs were entered after obtaining the consent from the Commission.

- b) The tariffs to be paid by the Discom to NCE units are the then prevailing Lowest Rate(s) discovered at the time of competitive bidding for solar and for wind project the tariff is as determined by the Commission from time to time.
- c) Due to high capital cost of NCE projects in the past, developers are not interested in this sector and hence in order to encourage investments in green energy sector, NCE projects are being treated as must-run ones.

<p>d) With generation of solar power taking place only during day time when adequate radiation of the Sun is available, and generation of wind energy being seasonal and dependent on wind velocity, admittedly, those units cannot meet peak requirements of the Discoms.</p> <p>e) By entering into long-term PPAs with NCE units with seasonal generation of power, the Discoms have to depend on other base-load stations to meet their requirement during the periods when NCE units cannot generate. It leads to some kind of inequilibrium, when non-NCE units have to be backed down during the periods when NCE units generate power.</p> <p>f) They, especially wind energy units, create problems for grid maintenance, with scope for unexpected wild fluctuations in generation.</p> <p>g) Notwithstanding the stated objectives of reducing global warming and protecting environment for encouraging generation and consumption of NCE, entering into long-term PPAs with NCE units, especially wind and solar energy units, at higher tariffs exceeding even the average cost of power purchase by the Discoms, far exceeding their obligations under RPPO, requirement of power and availability of power under existing PPAs in force and agreements or PPAs with ongoing projects, leads to increasing and unwarranted surplus power and payment of fixed charges for backing down the same not only at present but also in the medium term.</p> <p>h) Since the tariffs for NCE are higher, the Discoms cannot compete in the market to sell their surplus power at remunerative tariffs</p>	<p>d) Through these NCEs, in particularly solar, majority of load demanded has catered in day time itself like supply to Agriculture. To handle loads during absence of solar generation anyway there were long term agreements with base load plants like thermal, hydel, etc.</p> <p>e) Generation from NCE sources especially solar and wind are dependent on the climatic conditions. However it is a well-accepted fact this challenge has be addressed through grid integration measures which enable conventional coal based plants to respond to power generation and backing down requirements in a swift manner</p> <p>f) Currently, Discoms have only one agreement with wind power developer, M/s Mytrah vayu (Godavari) Pvt Ltd for a capacity of 100.8 MW. In view of the competitive bidding guidelines issued by MNRE for procurement of wind power and the subsequent competitive bidding which were held for wind power procurement, the price of wind power has dropped significantly from the regulated prices. TS Discoms will evaluate procurement of wind power based on need and after taking necessary grid integration measures</p> <p>g) Due to maturity of technology, globally we are seeing decline in solar power prices. Prices in India are also reflective of the same trend. Power system needs to accommodate the change in the generation mix due to increased penetration of renewables</p> <p>h) The price of power depends on numerous generation sources and is not limited NCE sources. It is the endeavour of the licensee to</p>
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<p>i) In order to purchase power from NCE units, even in a situation of availability of substantial surplus power, the Discoms have to pay higher tariffs to them, and back down other thermal stations with relatively lower tariffs. In other words, it imposes dual burdens on consumers of the Discoms, in the form of higher tariffs to NCE, on the one hand, and payment of fixed charges for backing down thermal stations, on the other.</p> <p>j) There are instances of extending time for completion of NCE projects, especially solar and wind, in a questionable manner. While PPAs were entered into with generators for purchasing NCE with higher generic and other tariffs determined through bidding, there have been delays in executing the units in agreed time schedules. While the generators are getting the benefit of falling prices of wind turbines and solar panels in the market with such impermissible delays, the Discoms continue to pay old higher tariffs to them, without corresponding reduction in tariffs. There are instances when PPAs are submitted to ERCs seeking their consent after NCE units are commissioned and started generation and supply of power to the Discoms, thus presenting the Commissions with a fait accompli.</p> <p>k) Existing and ongoing thermal and other non-NCE projects and the obligations of purchasing power from them under PPAs by the Discoms cannot be wished away. It is imprudent to enter into long-term PPAs with NCE units to purchase unwarranted power, when adequate power is, and going to be, available from other sources under PPAs.</p> <p>l) Ignoring these realities, among others, the Government of</p>	<p>reduce the power purchase cost through optimal contracting structures. This would enable TS Discoms in selling surplus power if any.</p> <p>i) As Discoms committed in the PPAs executed with the NCE developers according must-run status & to fulfill its RPPO, there is no other option except to back down thermal stations and when we are going for a back down(which is based on MERIT ORDER DISPATCH) Discoms have to pay fixed charges. These are in line with prudent grid management practices.</p> <p>j) Any extension in time for completion of NCE projects is being done with prior approval the Commission.</p> <p>k) There are obligations on part of utilities to procure power from NCE projects a quantum not less than that specified of its total energy consumption. And hence to meet the obligation, there is no other way to fulfill the obligation except procurment power from NCE sources.</p> <p>l) As one of the responsible nation on the world platform to combat</p>
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<p>India has been exercising its authority, taking undue advantage of power being in the concurrent list of the Constitution, to impose its whimsical policy decisions on the States, without any responsibility and accountability for the adverse consequences that arise as a result of implementing the same by the States.</p> <p>m) Allowing pollution-causing thermal and other power projects indiscriminately and irrespective of demand growth, on the one hand, and talking of need for encouraging NCE, on the other, in the name of environmental protection, is one of the glaring dichotomies in the policy approaches of the Governments.</p> <p>n) Till viable and economical inverter-like mechanism is developed and put to use to store NCE and use the same as and when required, the problems and adverse consequences, as explained above, among others, would continue to persist. Needless to say, research and development in that direction need to be encouraged. Hence, the need for a gradual, cautious and pragmatic approach is imperative for encouraging NCE.</p> <p>o) Global warming by its very definition is global in nature and needs to be tackled accordingly in a holistic and multi-dimensional way with international cooperation. Thermal power stations alone are not responsible for global warming and environmental problems and NCE alone is not the solution to the same.</p> <p>p) Instead of going in a cautious and gradual manner to purchase NCE through real and transparent competitive bidding periodically to get the benefit of falling tariffs, that the Governments have forced, and are forcing, the Discoms</p>	<p>the growing menace of climate change, GoI has made commitments on the International forums and to meet it, GoI has been pushing all its federal states towards sourcing of the green energy. These efforts are aimed at mitigating the climate change challenge.</p> <p>m) It may be appreciated that NCEs – Wind and solar alone will not be in a position to meet the grid demand on a 24 x 7 basis, hence it is desirable to have thermal stations up to some portion of its demand as installed capacity. Telangana being a new State carved out of unified A.P., has endeavoured to contract adequate quantities of thermal power to meet the grid demand.</p> <p>n) Globally we are witnessing a drop in the cost of energy storage. This has been possible due to research and maturity of the technology. It is expected that storage coupled with solar energy would be viable in due course of time.</p> <p>n)-</p> <p>o) Global warming may be attributable to a multitude of factors. However usage of thermal power is cited to be among the key contributing factors towards global warming.</p> <p>As a responsible nation, GoI has endeavoured to bring down the CO2 emission levels. It is the responsibility of State Government in mitigating the impact of global warming and taking steps to tackle it. The efforts of the licensee are in the same direction</p>
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	<p>to enter into long-term PPAs at higher tariffs to purchase NCE, with adverse consequences to the Discoms and their consumers, confirms their anxiety to do undue favours to generators and manufacturers, even with manipulative and extraneous considerations, and in the process the powers-that-be are encouraging themselves.</p> <p>q) Conditions specific to different States need to be taken into account for encouraging NCE and, as such, uniform targets under RPPO to all the States are unwarranted. That is the reason why the GoI is constrained to make it clear in its proposals for increasing percentages of NCE under RPPO, that they are guidelines only and that it is for the concerned ERC to determine such percentages. In other words, the concerned ERCs have to take a realistic view of objective conditions in the respective State while issuing RPPO orders and in considering long-term PPAs the Discoms have with NCE units, to protect larger consumer interest and ensuring orderly development of power sector to the extent permissible under their jurisdiction, instead of inclining to be more loyal than the king in allowing the Discoms to enter into long-term PPAs with NCE units indiscriminately and unrelated to requirement to meet growing demand for power periodically.</p>	<p>p) Any procurement from NCE generators is made through a transparent process of competitive bidding to make the tariff low & protect larger consumer interest.</p> <p>q) The licensees would endeavor to meet the requirements of renewable purchase obligations as set by Hon'ble Commission. The concerns of the objector would be addressed by Hon'ble Commission as it sets the RPPO targets in line with the GoI guidelines</p>
8	<p>Responding to our view, the Hon'ble APERC, in its order dated 13.12.2017 relating to 41 PPAs APSPDCL had with wind power developers, observed: "it has to be noted that what was prescribed by the Regulation on Renewable Power Purchase Obligation was the minimum renewable energy that has to be procured and there is no cap on the quantum of such energy that has to be procured. It is open to procure much more renewable energy than the minimum which should be a commercial and practical decision to</p>	<p>Discoms have not achieved its obligation to procure 5% of RPPO as per Regulation 1 of 2012 till 2016-17 with prevailing NCE contracts. With the present NCE contracts it is expected that Discoms may achieve 5.5 % by FY 2017-18. Further, the Hon'ble Commission has recently issued a draft regulation for the control period FY 2018-19 to FY 2021-22 mandating the Discoms to procure 6 % in FY 2018-19 and subsequently with an increase of 0.5 % for every year upto FY 2021-22 making it 7.5 %. In order to fulfill this obligation, Discoms</p>

<p>be taken by the utilities concerned” (para 57). Though the Hon’ble APERC pointed out that purchasing NCE more than the minimum determined by it under RPPO “should be a commercial and practical decision to be taken by the utilities concerned,” at the same time, it is for the Hon’ble Commission to determine whether the decisions of the Discoms to purchase power are “commercial and practical,” taking into account various issues submitted above and with a holistic view and regulate such purchases on “commercial and practical” grounds which should include the impact of avoidable additional burdens on consumers in the form of resultant higher tariffs and as a result of availability of substantial surplus power and the fixed charges to be paid for backing down the same. Leaving it to the discretion of the Discoms would tantamount to the Commission shirking its regulatory responsibility and allowing itself to be seen as a regularisation Commission. Already enough damage has been done to larger consumer interest by the powers-that-be and the power utilities of GoAP in taking decisions to purchase NCE on long-term basis at very high cost and by the Hon’ble APERC in giving its consents, approvals and orders accordingly. Allowing the Discoms to purchase 23.44% of NCE on long-term basis and at higher tariffs and imposing avoidable huge burdens on consumers cannot be justified under vague assertions of “commercial and practical” grounds and generalised assertions of environmental protection and promoting renewable energy. Promotion of renewable energy should not be allowed to degenerate into promoting the vested interests of developers, manufacturers and the powers-that-be at the cost of the vast multitude of consumers of power. It is untenable to presume that unless NCE is purchased on long-term basis and at higher tariffs, unrelated to requirement of power to meet growing demand and binding obligations of the Discoms under existing and proposed PPAs to purchase power from other sources, environment cannot be protected. The Hon’ble APERC</p>	<p>have to procure from NCE/RE generators a minimum quantum every year as its consumption i.e., demand will increase year on year and the obligation is on the total consumption.</p>
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	<p>observed that “ultimately it becomes a question of balancing conflicting factors and interests and there appeared to be no absolutes either way.” We would like to assert that allowing the Discoms to purchase 23.44% NCE, by no stretch of imagination, can be treated as “balancing conflicting factors and interests” and that, even though no justifiable “absolutes” appear, objective conditions and the real implications of such questionable decisions and consents are discernible and can be understood and the same should be taken into account before taking decisions and giving consents. In this regard, the powers-that-be and the Hon’ble APERC appear to be found wanting in taking prudent decisions and already irreparable damage has been caused to larger consumer interest on long-term basis. We are bringing these points to the notice of the Hon’ble TSERC in academic interest and for its consideration, since no fresh RPPO is issued by it and the minimum of 5% NCE to be purchased by the Discoms under the earlier RPPO continues to be in effect, but purchases of NCE at higher tariffs by the TS Discoms have already exceeded the minimum percentage. Our above-explained submissions on purchases of NCE by AP Discoms and consents and orders given by the Hon’ble APERC, would apply in the case of the NCE purchases being made by the TS Discoms also, albeit with a difference in degree.</p>	
9	<p>For the year 2018-19, the Discoms have considered variable costs of the thermal projects of TS Genco and central utilities as given by them or “capped” at escalation of 10% to 15% on the variable costs approved in the tariff order for 2017-18 without explaining the reasons for such abnormal escalation. If, for any reason, the costs of coal and the resultant variable costs increase during 2018-19, the Discoms will have the opportunity to claim the additional expenditure under true-up. Therefore, we request the Hon’ble Commission not to allow the presumptuous consideration</p>	<p>The licensee while projecting the VC of TS Genco stations considered the actual VC of TS Genco stations in H1 of 2017-18 and the projected cost of VC as given by generators. In many instances, the actual cost was exceeding the approved values by more than 10%. However with a view of not imposing additional burden due to higher PP cost, the licensee has limited the escalation on VC to 10% of the approved value.</p>

	of 10% to 15% escalation in variable cost for coal-based thermal stations.									
10	In the tariff order for 2017-18, the Hon'ble Commission has stated that, taking cognizance of the discontinuance of inter-state sharing of power between Telangana and Andhra Pradesh from 10.6.2017, the energy allocation from AP Genco has not been considered for the TS Discoms and that the entire availability of TS Genco has been considered for TS Discoms from 11.6.2017. As a result of this development, which has potential for legal litigations, how much of their share of power from the projects of AP Genco the TS Discoms are not getting and how much additional power the latter are getting from TS Genco? Is AP Genco raising bills for fixed costs for the power not being supplied to TS Discoms, obviously, treating such non-supply as backing down? Are the TS Discoms contesting non-supply of their share of power by AP Genco? As a result of non-supply of their share of power from AP Genco and supply of additional power from TS Genco, what is the estimated total saving in cost of power purchase of TS Discoms, in view of the fact that the variable costs of thermal projects of TS Genco are relatively lower, being pithead stations, vis a vis the higher variable costs of the thermal projects of AP Genco?	The energy availability post the shared allocation scenario has improved marginally (it has increased by ~ 30 Mus). Although APGENCO has been raising bills even after the aforesaid order date, TSDICOMS have not paid up and have returned those bills.								
11	While proposing 24-hour a day supply of power to agriculture, the Discoms have projected cost of service for agriculture @ Rs.6.58 per kwh for SPDCL and @ Rs.6.39 per kwh for NPDCL. The Discoms have reportedly spent thousands of crores of Rupees for strengthening and expanding distribution system for ensuring supply of power to agriculture throughout the day. That expenditure has to be taken into account for working out cost of service for agriculture and after determining cross subsidy for agriculture, the remaining amount required for purchasing and	As per the Telangana State Government Policy to supply 24hrs power to Agriculture from January 1st, 2018, the consumption for the period Jan-March 2018 and for the entire year of 2018-19 is projected considering the growth of 33.36%. <table border="1" data-bbox="1400 1242 2373 1393"> <tr> <td colspan="4">Computation of growth in Consumption in Units/KVA because of implementation of 24 hrs power supply to Agriculture</td> </tr> <tr> <td>Circle</td> <td>Avg</td> <td>Avg</td> <td>Growth % Jul-</td> </tr> </table>	Computation of growth in Consumption in Units/KVA because of implementation of 24 hrs power supply to Agriculture				Circle	Avg	Avg	Growth % Jul-
Computation of growth in Consumption in Units/KVA because of implementation of 24 hrs power supply to Agriculture										
Circle	Avg	Avg	Growth % Jul-							

supplying power needed for agriculture should be provided by GoTS towards subsidy to implement its decision of supply of power free of cost to agriculture. As is well known, the APERC earlier in the united Andhra Pradesh and even now, and the TSERC after it came into existence, have been reducing the requirement of power for agriculture projected by the Discoms. The Discoms have been claiming true up for additional supply of power to agriculture. The problem of determining agricultural consumption of power realistically continues to be intractable, in the absence of metering of agricultural pump sets and the questionable methodologies being adopted by the Discoms for working out consumption of power for agriculture. The decision of the GoTS to supply power to agriculture throughout the day and free of cost would further complicate the problem, with added scope for manipulations. The need, as well as practicability, for 24-hour a day supply of power to agriculture has not been explained by the authorities concerned, as if the decision by itself were justified. The farmers have never asked for supply of power throughout the day for agriculture. Needless to say, it is imperative to ensure supply of power to agriculture adequately and in time to see that crops do not wither away for want of supply of power for pumping out required ground water by enhancing the hours of supply whenever and wherever required for this purpose. By and large, such a prudent arrangement has been in practice over the years. The farmers have been demanding supply of power to agriculture during the day time. If such an arrangement is possible, the need for supply of power throughout the day for agriculture remains questionable. Going by the extent of land and the kind of crops they cultivate, the duration for which water is required, availability of ground water and interregnum between two spells of pumping required for replenishment of ground water, etc., small and marginal farmers, obviously, do not require supply of power throughout the day.

	consumption of Jul-Aug'16 (Units/KVA)	consumption of Jul-Aug'17 (Units/KVA)	Aug 2017/2016
Nalgonda	103.81	123.95	19.40%
Medak	98.75	115.46	16.92%
Siddipet	97.96	160.41	63.76%
Average Growth in Consumption in Units/KVA with 24hrs power to Agriculture			33.36%

Benefits of 24 hours power supply to agriculture sector:

- Flexibility of farmers to utilize power whenever the consumer wants.
- Avoid accidents because of power supply during night hours.
- Judicious usage of water by farmers as they need not keep the motors switched on continuously.

	<p>Then, who are the real beneficiaries of supply of power throughout the day to agriculture? How much additional quantum of power is estimated to be required for supply to agriculture throughout the day in the State, going by the results of implementing the programme on experimental basis in three (old) districts? For ensuring such supply, how the Discoms are proposing to maintain grid frequency and what kind of situations they are facing for backing down installed capacities, with fluctuations in usage of power by agriculture daily and seasonally? Is this decision intended to justify the questionable decisions of the powers-that-be in forcing the Discoms to enter into short-term, medium-term and even long-term PPAs for purchasing unwarranted power, including NCE which cannot meet peak demand, especially in view of the trend of projections of requirement of power proven to be inflated?</p>	<p>The total agriculture consumption under TSSPDCL for the year 2018-19 is projected as 12,285 MUs based on the above methodology. However, the total projected consumption for Agriculture is reduced because of the following reasons:</p> <ul style="list-style-type: none"> ➤ The entire estimated total DTR capacity for H2 2017-18 and 2018-19 is considered for projecting the consumption. However, in reality, the new connections will be released in a phased manner over months. ➤ An Additional sales of 941.92 MUs for LI Schemes is projected for the year 2018-19 under TSSPDCL. This will reduce burden on Agriculture pump sets to an extent. ➤ Telangana State Government is campaigning for removal of auto starters for the pump sets. This will avoid wastage of water and electricity. <p>With the implementation of 24 hrs power supply to Agriculture, the farmers can pump water at any time of the day at their comfort. Because of this, it is expected that they will judiciously pump water only as per their requirement resulting in lower consumption of electricity.</p>
12	<p>Despite the fact that tariff hike is being permitted and substantial amounts of subsidy are being provided by the Government every year, huge revenue gap for the next financial year and true up claims for revised revenue deficits for past periods are being projected by the Discoms. The failures of commission and omission of the Government of India, imprudent decisions taken by the powers-that-be and at their behest by the power utilities of the GoTS, some of the consents and orders being given by the Hon'ble Commission and inefficiencies of the power utilities are the root causes for the ever burgeoning and avoidable burdens on consumers of power in particular and on the people of the State in general. In view of the substantial revised revenue gap of</p>	<p>It may be appreciated that the supply of 24x7 power supply is a policy decision of GoTS and TS Discoms have been successful in meeting the GoTS objective. This particular aspect as a major bearing on the revenue gap for FY 2017-18.</p> <p>The licensee has endeavored to provide realistic estimate on demand and availability. Purchase of power from NCEs would enable the licensee in meeting the renewable purchase obligation which has a positive impact on the environment.</p>

<p>Rs.6824.59 crore for the year 2017-18 shown by the Discoms, we request the Hon'ble Commission to determine revenue requirement and revenue gap of the Discoms for the year 2018-19 realistically by assessing availability of power under existing PPAs and agreements the Discoms had with projects, realistic demand for 2018-19, availability of surplus, problems of backing down that arise as a result of purchasing unwarranted power from NCE units, need for additional power, if any, during peak hours and opportunities available to purchase the same at competitive tariffs and for the short duration required, need for efforts by the GoTS and its power utilities to get fuels like natural gas and indigenous coal as per allocations made to various projects from whom the Discoms purchase power under PPAs, dispensing with the imprudent practice of determining generic tariffs for NCE and allowing/forcing the Discoms to enter into long-term PPAs with NCE units to purchase power at such higher generic tariffs, permitting the Discoms to enter into long-term PPAs with developers by selecting them through real, transparent and competitive bidding process only based on realistic long-term and medium-term load forecast and power procurement plans. If revenue requirement and revenue gap are determined unrealistically in such a way that whatever subsidy the GoTS is willing to provide would bridge the revenue gap, as was the case for the year 2017-18, the Discoms will come up with substantial revised revenue gap for 2018-19 later and seek true up of the same in the post-election period. This statistical trick can be played by artificially deflating revenue requirement and revenue gap. Any such statistical legerdemain would serve the devious political expediency of the party-in-power to hoodwink the people that there are no additional burdens on consumers in the form of tariff hike in the pre-election period.</p>	
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S.No.	Summary of Objections / Suggestions	Response of the Licensee
4. G.V. MallikarjunaRao, Chief Electrical Districution Engineer, South Central Railway, Secunderabad.		
1	<p><u>Traction Tariff Proposed for 2018-19</u></p> <p>a. At Present the traction tariff is Rs. 390/KVA (Demand Charges) and Rs.4.05 /KVAh (Energy Charges).</p> <p>b. Now, Discoms have proposed the tariff same as 2017-18 without any change in tariff.</p>	
2	<p><u>Railway option for open access for availing traction power supply</u></p> <p>a. It is brought to the notice of the Hon'ble Commission, Indian Railways are already availing power through open access in various States/Railways from RGPPL. Shortly, Indian Railways are planning to avail power from Bhartiya Rail Bijlee company ltd. (BRBCL) JV of Indian Railways and NTPC at cheaper rate. As a distribution licensee cross subsidy charges are also not applicable for Railways.</p> <p>b. Due to discriminative policy of Discoms and over burden, Railways as a deemed licensee, already planned to avail power through open access in Telangana state also upto March 2022.</p> <p>c. In view of this, it is brought to your kind notice, Hon'ble Andhra Pradesh State Electricity Regulatory Commission (APERC) has also fixed reasonable traction tariff as Demand Charges Rs.300/KVA/Month and energy Charges Rs.3.55/KVAh for the year 2017-18 (Equivalent to Rs.4.74 /unit) and the same tariff is proposed to continue for the year 2018-19.</p> <p>d. In this circumstance, existing and proposed tariff of TS Discoms Rs.390/KVA demand charges and Rs.4.05 /KVAh at an average of Rs. 5.60 /KVAh is very high comparatively tariff of AP state i.e Rs. 4.70/KVAh. Comparatively, Higher traction tariff of Telangana state, over burdento Railways and Prompt paying bulk consumer. The higher tariff of</p>	<p>a. As per the clause 11 of Regulation 4 of 2016, the deemed licensee shall make an application in the form specified in schedule-2 to the Commission to get identified as deemed License</p> <p>b. The licensee has followed the principles outlined in the tariff policy and provisions of Electricity Act 2003 with regard to open access. As per the request of the Railways, Honble Commission has reduced the tariff of Railway Traction service during the year 2017-18. Even after bringing down the tariffs less than 20% of average COS, the objectors contention that Discoms are showing discrimination on Railways is baseless.</p> <p>c. Tariff determination is under the purview of the Hon'ble SERCs of respective states</p> <p>d.Tariff applicable to different categories of consumers are dependent on a number of factors. As per Section 62 (3) of Electricity Act 2003, <i>"The Appropriate Commission shall not, while determining the tariff under this Act, show undue preference to any consumer of</i></p>

	<p>Discoms forcing Railway to go for Open access to meet its consumption.</p>	<p><i>electricity but may differentiate according to the consumer's load factor, power factor, voltage, total consumption of electricity during any specified period or the time at which the supply is required or the geographical position of any area, the nature of supply and the purpose for which the supply is required”</i> Hence it may be noted that comparison of effective tariff may not be appropriate as it is dependent on the factors mentioned above.</p>
<p>3</p>	<p><u>Determination of Cross Surcharge for Open Access for 2018-19:</u></p> <p>TS Discoms have Proposed Cross Subsidy Surcharge for Open Access consumers as Rs.1.25 (TSSPDCL) and Rs.1.00 (TSNPDCL) for Railway traction.</p> <p>Ministry of Power Vide Lr.No.25/19/2004-R & R Dt. 06.05.2017 (Annexure-I) clarified that Railways is a deemed licensee under the third provision to section 14 of the Electricity Act, 2003.</p> <p>It is submitted that, National Tariff Policy was notified on 28.01.2016 with a clause regarding exemption of cross subsidy surcharge on Railway has been introduced.</p> <p>National Tariff Policy 8.5.1 stipulates “provided further that the appropriate Commission, in consultation with the Appropriate Government, shall exempt levy of cross subsidy charge on the Railways as defined in Indian railways Act, 1989 being a deemed licensee on electricity purchased for its own consumption.”</p> <p>In view of this, Hon’ble Commission is requested to exempt Railways as a deemed licensee from Payment of Cross Subsidy Surcharge as per Spirit and compliance of guidelines of National</p>	<p>As per the clause 11 of Regulation 4 of 2016 of TSERC, the deemed licensee shall make an application in the form specified in schedule-2 to the Commission to get identified as deemed License</p>

	Tariff Policy.	
4	<p><u>Implementation of unified tariff for Railways for Non traction purpose:</u></p> <p>Recently, Maharashtra State Electricity distribution company Ltd (MSEDCL) had issued revised tariff rates applicable Railway/Metro/Monorail under category HT-III with tariff as follows.</p> <p>The tariff category is applicable to power supply at high voltage for Railways, Metro and Monorail including stations and shops, workshops and yards etc.</p> <p>Central Railway and Western Railway in Maharashtra State already converted their existing Non-traction loads like Stations, Work Shops, yards etc to the HT-III Category. TSSPDCL has also proposed a combined single unified tariff to Hyderabad Metro Rail Limited (HMR) with HT-V (B) @ Rs.390/demand charge and Rs.3.95 per unit to run its operations which includes:</p> <ol style="list-style-type: none"> a. Traction Load. b. Access Pathways to the Station such as elevators, staircase (including escalators) and Platforms used for the purpose of boarding the train. c. Enabling areas such as ticket counters, station office, operation/control rooms, depots and public washrooms located within the station premises (excluding) areas allotted for vehicle parking) <p>Whereas, Railway traction (HT-V-A) has proposed tariff only for railway traction and not included any other loads with railway traction and for non traction loads has proposed in separate categories viz. HT-I,II,III & IV.</p>	<p>Considering the nature of activities in HMR which are aimed at providing convenience to general public, a single unified tariff for HMR was proposed.</p> <p>However activities of shops are commercial in nature and the commercial load (other than that in the above clause) at HMR stations and other HMR premises including any retail counters that are set up under the Telangana Shops and Establishments Act, 1988 shall be metered and billed separately as per the relevant tariff category.</p> <p>Hence the licensee prays that the Hon'ble Commission may continue with current classification of loads to be billed under HT – V A Traction.</p>

	<p>Hence, S C Railway is requested to examine the above and issue orders similar to Maharashtra and include other non traction loads in Railway traction category.</p>	
<p>5</p>	<p><u>Comparison with HMR</u></p> <p>TSSPDCL proposed tariff for HMR Rs.390/KVA (Demand Charges) and Rs.3.95/KVAh (Energy Charges) to run its operations which includes</p> <ol style="list-style-type: none"> 1) Traction load 2. Access Pathways to the Station such as elevators, staircase (including escalators) and Platforms used for the purpose of boarding the train. 3. Enabling areas such as ticket counters, station office, operation/control rooms, depots and public washrooms located within the station premises (excluding) areas allotted for vehicle parking) <p>The Proposed energy charges for Railway traction tariff of Rs. 4.05 per unit is higher than the HT-V (Metro) Category by 10 Paise despite the fact that both are availing supply at same voltage level and for the same services in public transport. As brought out in Para 4.0 above, the Railway draws substantial supply during off peak period thus helping in improving base load and supporting the grid stability. Charging of such higher tariff for Railway is irrational and unjustified as per section 45(4) of Electricity Act, 2003.</p> <p>Hence, Hon'ble commission is requested to consider Railways plea and fix the tariff similar to HMR for traction</p>	<p>In view of the essential services being provided by HMR to consumers in the city of Hyderabad, energy charges has been fixed marginally lower than traction by INR 0.10/kVAh.</p> <p>As per section 45 (4) of Electricity Act 2003 – <i>“Subject to the provisions of section 62, in fixing charges under this section a distribution licensee shall not show undue preference to any person or class of persons or discrimination against any person or class of persons”</i></p> <p>As per section 62 – <i>“The Appropriate Commission shall not, while determining the tariff under this Act, show undue preference to any consumer of electricity but may differentiate according to the consumer's load factor, power factor, voltage, total consumption of electricity during any specified period or the time at which the supply is required or the geographical position of any area, the nature of supply and the purpose for which the supply is required”</i></p> <p>The impact of operations of HMR and Railways are different due to the nature of operations and the purpose served by them. Two part tariff is applicable to both HMR and Railways, keeping in view the prudent practice of recovery of costs. The entities availing power can optimize the cost of procurement depending on their operating profiles.</p> <p>For reasons explained in the preceding section, the licensee prays that the Hon'ble Commission may continue with the existing classification of loads to be billed under HT V –A (Railway Traction)</p>

	and non traction purpose for all its train operations related activities i.e. Including Railway stations, coaching depots, Loco sheds/Work shops etc.	
6	To give impetus to electrification of Railway network, a rebate of at least 10% of energy charges be allowed for a period of 5 years similar to Railway traction tariff Madhya Pradesh and Chattisgarh.	The tariff for Railways was INR 7.10/kVAh for the FY 2016-17. This has been substantially brought down to INR 4.05/kVAh for 2017-18 by Hon'ble TSERC along with a levy of demand charge. This is in accordance with the general principle of tariff structure to have two part tariff, i.e. capacity/ fixed/ demand charges and energy charges. The licensee has proposed to retain the same reduced tariff applicable in FY 2017-18 for the ensuing year FY 2018-19 as well, avoiding any additional burden on Railways.

S.No.	Summary of Objections / Suggestions	Response of the Licensee												
5 M. Thimma Reddy, Convenor, People's Monitoring Group on Electricity Regulation 139, Kakatiya Nagar, Hyd-500 008														
1	According to ARRs of TSDISCOMs during the FY 2018-19 electricity requirement in Telangana would be 64, 291 MU. An examination of UDAY Document signed by both the DISCOMs and GoTS with GoI shows that during this FY electricity requirement would be 61, 588 MU. ARR estimate of electricity requirement during FY 2018-19 appears to be higher by 2,700 MU entailing an additional power purchase expenditure of Rs. 1,171 Crore (at average power cost of Rs. 4.34/U). It is important to review electricity requirement estimate arrived at by the TSDISCOMs in their ARRs	At the time of entering into UDAY agreement, 24 hrs power supply to agriculture sector is not considered and also there are lot of new schemes like mission Bhageeratha, new lift irrigation schemes have come up after UDAY agreement which are considered in sales forecast for FY 2018-19 in this filings. Hence there is an increase in power procurement for FY 2018-19 in ARR filings 2018-19 when compared to that of in UDAY document. The expected PP cost for procuring 42193 MU is estimated at Rs 27,903 crs at an average PP cost of Rs 4.37 per unit for TSSPDCL.												
2	<p>TSDISCOMs in their ARR filings explained that their sales projections/consumption estimates of electricity are based on Trend Method and End User Method. An analysis of electricity consumption figures for the FY 2017-18 shows that this method might be giving rise to over estimated consumption figures. In the present ARR filings the figures for consumption estimates for FY 2017-18 are available at two places – Energy Balance (2.1.1 – p.10 of NPDCL and p.11 of SPDCL) and in the Section on Sales Forecast (3.2.4 – p.24 of NPDCL and p.42 of SPDCL). Figures in Sales Forecast are based on Trend Method and End User Method. Details are given in the following table:</p> <table border="1" data-bbox="325 1052 1163 1247"> <thead> <tr> <th data-bbox="325 1052 551 1133">DISCOM</th> <th data-bbox="551 1052 854 1133">Energy Balance (MU)</th> <th data-bbox="854 1052 1163 1133">Sales Forecast (MU)</th> </tr> </thead> <tbody> <tr> <td data-bbox="325 1133 551 1170">TSNPDCL</td> <td data-bbox="551 1133 854 1170">15,830</td> <td data-bbox="854 1133 1163 1170">16,336</td> </tr> <tr> <td data-bbox="325 1170 551 1208">TSSPDCL</td> <td data-bbox="551 1170 854 1208">36,811</td> <td data-bbox="854 1170 1163 1208">38,664</td> </tr> <tr> <td data-bbox="325 1208 551 1247">Total</td> <td data-bbox="551 1208 854 1247">52,641</td> <td data-bbox="854 1208 1163 1247">55,000</td> </tr> </tbody> </table>	DISCOM	Energy Balance (MU)	Sales Forecast (MU)	TSNPDCL	15,830	16,336	TSSPDCL	36,811	38,664	Total	52,641	55,000	The energy requirement of 36811 MU shown at page 11 of TSSPDCL ARR filings is the energy requirement at Discom level in which the Transmission losses and PGCIL losses were not included. Whereas, the energy requirement shown at page 42 of TSSPDCL ARR filings (38664 MU) is inclusive of transmission and PGCIL losses.
DISCOM	Energy Balance (MU)	Sales Forecast (MU)												
TSNPDCL	15,830	16,336												
TSSPDCL	36,811	38,664												
Total	52,641	55,000												
3	From the above table it is clear that power consumption estimates for FY 2017-18 based Trend Method and End User Method are higher by 2,359 MU compared to the figures provided in the Energy balance Section of ARRs of both the DISCOMs. This shows													

	that the Trend Method and End User Method is leading to over estimation of electricity consumption. From this one may infer that the electricity consumption estimate for the FY 2018-19 is similarly over estimated. The same need to be revised.																																			
4	<p>Power consumption in the past: (MU)</p> <table border="1"> <thead> <tr> <th rowspan="2">DISCOM</th> <th colspan="3">2016-17</th> <th colspan="3">2017-18</th> </tr> <tr> <th>ARR</th> <th>APERC</th> <th>Actual</th> <th>ARR</th> <th>APERC</th> <th>Present Estimate</th> </tr> </thead> <tbody> <tr> <td>NPDCL</td> <td>15,592</td> <td>14,379</td> <td>14,674</td> <td>16,323</td> <td>15,587</td> <td>15,830</td> </tr> <tr> <td>SPDCL</td> <td>39,292</td> <td>37,685</td> <td>34,804</td> <td>38,433</td> <td>36,658</td> <td>36,811</td> </tr> <tr> <td>Total</td> <td>54,884</td> <td>52,063</td> <td>49,478</td> <td>54,756</td> <td>52,235</td> <td>52,641</td> </tr> </tbody> </table> <p>Past experiences show that actual power procurement by the TSDISCOMs was much less than their ARR proposals. During 2016-17 while TSDISCOMs as part of ARR proposals projected energy requirement of 54,884 MU the actual procurement was only 49,478 MU. Similarly, during 2017-18 while DISCOMs as part of ARR proposals projected energy requirement of 54,756 MU estimated procurement will be 52,641 MU. During 2016-17 the actual power procurement was also less than the quantum approved by the Commission. During 2017-18 estimated procurement is slightly higher than the quantum approved by the Commission. This is largely due to higher expected consumption in the agriculture sector, while metered sales are expected to be lower than the quantum approved by the Commission.</p>	DISCOM	2016-17			2017-18			ARR	APERC	Actual	ARR	APERC	Present Estimate	NPDCL	15,592	14,379	14,674	16,323	15,587	15,830	SPDCL	39,292	37,685	34,804	38,433	36,658	36,811	Total	54,884	52,063	49,478	54,756	52,235	52,641	The total sales recorded in 2016-17 in TSSPDCL are 30844 MU against the approved sales of 32759 MU by TSERC in the Tariff order 2016-17. The reduction in sales is mainly due to increase in open access sales which are 2159 MU.
DISCOM	2016-17			2017-18																																
	ARR	APERC	Actual	ARR	APERC	Present Estimate																														
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Total	54,884	52,063	49,478	54,756	52,235	52,641																														
5	TSSPDCL projected 10.32% increase in total electricity consumption during 2018-19 while during 2017-18 it increased by 7.07% only. In the case of HT consumers TSSPDCL projected 27.66% increase in electricity consumption during 2018-19 while during the previous year its consumption increased by 5.19% only. Even without new lift irrigation schemes, Mission Bhagiratha and 24 hour power supply to agriculture electricity consumption	The Licensee has projected sales of 33,026 MU for FY 2017-18 with a growth rate of 7.07% over 2016-17. This is mainly due increase in agricultural sales due to providing 24 hrs power supply to agriculture sector from January 1 st , 2018 and upcoming HMR Stations of 20MVA capacity at Uppal, Miyapur & MGBS in FY17-18H2. For the FY 2018-19, the licensee has projected a sales volume of 36,434 MU for FY 2018-19 with a growth rate of 10.32% over 2017-																																		

	<p>growth rate during ensuing year (8.38%) will be higher than the current year (6.89%) Similarly, TSNPDCL projected 36.25% increase in total electricity consumption during 2018-19 while during 2017-18 it increased by 9.65% only. In the case of HT consumers TSNPDCL projected 105.51% increase in electricity consumption during 2018-19 while during the previous year its consumption increased by 14.57% only. This trend points to the need to exercise caution while adopting DISCOM's estimate of power consumption and procurement during the ensuing year i.e., 2018-19. Overestimation of HT sales will have adverse impact on the finances of DISCOMs. Lower than projected consumption by high tariff consumers like HT services will lead to under realization of revenue and consequent increase in deficit of DISCOMs</p>	<p>18. The growth rate is increased mainly due to anticipation of</p> <ul style="list-style-type: none"> i) some major industrial loads like, IKEA with a CMD of 3.2 MVA, Pharma City a CMD of 50 MVA and Amazon data centres a CMD of 50 MVA, ii) 11 MVA load of commercial loads of Hyderabad Metro services, iii) 627 MVA load of various lift irrigations schemes (parts of Kaleshwaram L.I, Regonda-Thotapally Reservoir, Udaya samudram L.I), iv) 42 MW of Mission Bhageeratha, and v) 52 MVA of new Traction loads and 20 MVA of Hyderabad Metro rail . The overall growth rate of total sales projected for FY 2018-19 over 2017-18 without agriculture, lift irrigation and Mission bhageeratha 8.38%.
<p>6</p>	<p>ARR filings of both the DISCOMs show that electricity consumption by lift irrigation schemes is going to increase substantially. Under TSSPDCL electricity consumption by lift irrigation schemes is going to increase by 125% and in the case of TSNPDCL it is going to increase by 575% during ensuing year. How many of the listed LIS will in fact become operational need to be examined. Some of these schemes are still under construction. Foundation stone for Tummilla scheme in Gadwal-Jogulamba district was laid only during second week of January. Besides this, electricity consumption by these LIS will be restricted to a short period and will have different consumption dynamics. These aspects need to be taken in to account while assessing electricity consumption by this category.</p>	<p>The projected requirement given by the irrigation department have been reduced by considering the physical progress of the schemes and sales were projected with 120 days of operation in a year with 16 hours per day of operation. Further the likely water inflows has been factored in and period of operation has been considered accordingly from mid-July to mid-october or August to October. The mentioned Tummilla scheme has not been considered in TSSPDCL sales projection.</p>
<p>7</p>	<p>Agriculture sector is going to account for 26% of the electricity to be supplied in Telangana during the FY 2018-19. Both the DISCOMs have claimed that they are following the ISI methodology stipulated by the Commission in estimating electricity consumption in the agriculture sector. Apart from this assertion no other details about this estimation is made part of the ARR filing. 24 hour supply of electricity is going to present</p>	<p>The circle wise month wise consumption is projected for the year 2018-19 by applying the average growth of 33.36% to the circle wise month wise average consumption in the year 2016-17 and multiplying the same with the circle wise projected DTR capacity for 2018-19. The total agriculture consumption under TSSPDCL for the year 2018-19 is projected as 12,285 MUs based on the above methodology.</p>

	<p>another problem in this regard. TSSPDCL in its filings stated that during the ensuing year electricity consumption in agriculture sector will grow by 2.83% while during the current year (2017-18) it increased by 8.31%. Given 24 hour power supply throughout the year growth rate in consumption would have been higher during ensuing year compared to the current year. TSSPDCL also stated, “Significant growth rate of 34.52% is observed in FY 2016-17 over FY 2015-16 and 49.12% in H1 of FY 2017-18 over H1 of 2016-17.” All these numbers appear unconvincing.</p>	<p>However, the total projected consumption for Agriculture is reduced because of the following reasons:</p> <ul style="list-style-type: none"> ➤ The entire estimated total DTR capacity for H2 2017-18 and 2018-19 is considered for projecting the consumption. However, in reality, the new connections will be released in a phased manner over months. ➤ An Additional sales of 941.92 MUs for LI Schemes is projected for the year 2018-19 under TSSPDCL. This will reduce burden on Agriculture pump sets to an extent. ➤ Telangana State Government is campaigning for removal of auto starters for the pump sets. This will avoid wastage of water and electricity. ➤ With the implementation of 24 hrs power supply to Agriculture, the farmers can pump water at any time of the day at their comfort. Because of this, it is expected that they will judiciously pump water only as per their requirement resulting in lower consumption of electricity. 																																				
<p>8</p>	<p>Similarly, TSNPDCL stated that during FY 2017-18 electricity consumption by the agriculture pump sets will increase by 10.35% and the same will be 14.57% during FY 2018-19. In the ARR for the FY 2017-18 both the DISCOMs stated that electricity consumption by the agriculture pump sets would be increasing by 6.50%. Present estimates by them shows that this increase will be much higher</p>																																					
<p>9</p>	<p>Under the given ISI methodology DISCOMs are expected to provide Circle wise information related to number of agriculture services, their connected load and annual electricity consumption. We request the Commission to direct the DISCOMs to provide this information.</p>	<p>The circle wise no. of consumers, connected capacity are given below: 2017-18</p> <table border="1" data-bbox="1397 933 2486 1398"> <thead> <tr> <th>Circle</th> <th>No. of Agl Services</th> <th>Connected DTR Capacity (KVA)</th> <th>Projected Annual Consumption (MU)</th> </tr> </thead> <tbody> <tr> <td>Nalgonda</td> <td>376,685</td> <td>2504916</td> <td>2955.08</td> </tr> <tr> <td>Mahbubnagar</td> <td>253,186</td> <td>2231769</td> <td>1693.60</td> </tr> <tr> <td>Medak</td> <td>127,677</td> <td>1010043</td> <td>1315.72</td> </tr> <tr> <td>Siddipet</td> <td>163,046</td> <td>1198874</td> <td>1626.26</td> </tr> <tr> <td>RR (N)</td> <td>123,403</td> <td>86557</td> <td>110.48</td> </tr> <tr> <td>RR (S)</td> <td>12,828</td> <td>1432168</td> <td>1635.57</td> </tr> <tr> <td>RR (East)</td> <td>24,169</td> <td>156082</td> <td>159.48</td> </tr> <tr> <td>Total</td> <td>1,080,994</td> <td>8620411</td> <td>9496.19</td> </tr> </tbody> </table>	Circle	No. of Agl Services	Connected DTR Capacity (KVA)	Projected Annual Consumption (MU)	Nalgonda	376,685	2504916	2955.08	Mahbubnagar	253,186	2231769	1693.60	Medak	127,677	1010043	1315.72	Siddipet	163,046	1198874	1626.26	RR (N)	123,403	86557	110.48	RR (S)	12,828	1432168	1635.57	RR (East)	24,169	156082	159.48	Total	1,080,994	8620411	9496.19
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10	<p>To improve estimation of electricity consumption by agriculture pump sets these services need to be geo tagged as is being done in Andhra Pradesh. This exercise in AP has shown that more than 10% of these services are not in operation.</p> <p>Along with this feeder wise electricity consumption data need to be made available to cross check the numbers arrived using the present methodology. Record of feeder electricity consumption on a daily/monthly basis could be given organized division wise. This could be in easily accessible format (MS-Excel) and available on the website of the DISCOMs.</p>	<p>It is to submit that, the assessment of agricultural consumption of all rural circles is being done every month as per the ISI methodology suggested by Hon'ble TSERC and submitted to the Hon'ble TSERC. TSERC has referred to ASCI to study any new methodology for calculation of AGL consumption. A joint meeting was conducted by ERC with Administrative Staff College of India & Discom officials on 22.08.2017 to chalk out a better method for calculation of the Agl. Consumption. ASCI is going to conduct a statistical analysis on the crop pattern, geographic location and working for preparation of new methodology of estimation of Agl. Consumption. If this new methodology approved by TSERC it may be adopted by DISCOMS.</p>																																				
11	<p>Given the lack of transparency in estimating electricity consumption in the agriculture sector under the existing system it is better to explore alternative methods. Under UDAY TSDISCOMs are obliged to meter all DTRs including DTRs serving agriculture services by June 2017. We request the Commission to direct the TSDISCOMs to estimate electricity consumption by the agriculture pump sets based on the readings of these meters. In this context</p>	<p>UDAY MoU specifies an action plan regarding DTR metering in urban area and there is no specification regarding the metering of all DTRs.</p>																																				

	we also would like to know the progress in metering DTRs in the state and the plan to complete it																																
12	<p>T&D losses</p> <table border="1"> <thead> <tr> <th rowspan="2">DISCO</th> <th colspan="5">2018-19</th> <th colspan="2">2017-18</th> </tr> <tr> <th>Power procurement (MU)</th> <th>Sales (MU)</th> <th>T&D Losses (MU)</th> <th>T&D Losses (%)</th> <th>UDAY AT&C Losses (%)</th> <th>APERC T&D Losses (%)</th> <th>Estimated T&D Losses (%)</th> </tr> </thead> <tbody> <tr> <td>NPDCL</td> <td>22,098</td> <td>19,249</td> <td>2,849</td> <td>12.89</td> <td>10.00</td> <td>10.20</td> <td>10.75</td> </tr> <tr> <td>SPDCL</td> <td>42,193</td> <td>36,434</td> <td>5,759</td> <td>13.65</td> <td>9.90</td> <td></td> <td>10.28</td> </tr> </tbody> </table> <p>TSNPDCL and TSSPDCL show higher T&D losses during 2018-19 than they have achieved in the previous years. During 2017-18 T&D losses of TSNPDCL stood at 10.75% and during the ensuing year (2018-19) these losses are estimated to be 12.89%. Similarly, in the case of TSSPDCL during 2017-18 T&D losses stood at 10.28% and during the ensuing year (2018-19) these losses are estimated to be 13.65%. Over the period in fact these losses shall come down. ARRs for the ensuing year present an opposite picture.</p>	DISCO	2018-19					2017-18		Power procurement (MU)	Sales (MU)	T&D Losses (MU)	T&D Losses (%)	UDAY AT&C Losses (%)	APERC T&D Losses (%)	Estimated T&D Losses (%)	NPDCL	22,098	19,249	2,849	12.89	10.00	10.20	10.75	SPDCL	42,193	36,434	5,759	13.65	9.90		10.28	<p>TSSPDCL has considered the T&D losses of 14.58% for FY 2017-18 and 13.65% for FY 2018-19. The losses 10.28 % are the distribution losses only, transmission losses are not included in this.</p>
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13	<p>For the FY 2018-19 the Tripartite MoU under UDAY set the AT&C losses of TSNPDCL at 10.00% and TSSPDCL at 9.90%. The T&D losses projected by TSDISCOMs in the ARR for FY 2018-19 are higher than the levels stipulated under the Tripartite MoU. This shows that there is scope to bring down T&D losses from the levels projected in the ARRs.</p>	<p>As per the Regulation 4 of 2005 of APERC, the licensee has calculated the energy requirement by considering the approved loss trajectory of Honble Commission in the distribution tariff order which are shown below:</p> <table border="1"> <thead> <tr> <th>Losses</th> <th>FY17-18</th> <th>FY18-19</th> </tr> </thead> <tbody> <tr> <td>LT Loss (%)</td> <td>5.25%</td> <td>5.00%</td> </tr> <tr> <td>11 kV Loss (%)</td> <td>4.40%</td> <td>4.25%</td> </tr> <tr> <td>33 kV Loss (%)</td> <td>3.99%</td> <td>3.99%</td> </tr> </tbody> </table> <p>The Hon'ble Commission had approved a loss trajectory for the licensee as per the Transmission tariff order for the Balance Period of 3rd Control Period i.e. FY 2017-18 and FY 2018-19 and the same has been considered for projection of energy input for 2017-18 and 2018-19.</p>	Losses	FY17-18	FY18-19	LT Loss (%)	5.25%	5.00%	11 kV Loss (%)	4.40%	4.25%	33 kV Loss (%)	3.99%	3.99%																			
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<p>14</p>	<p>We request DISCOMs to provide data on unmetered consumption and T&D losses for the past few years in the following format for each DISCOM. DISCOM Name:</p> <table border="1" data-bbox="325 537 1284 760"> <thead> <tr> <th>Year/data</th> <th>Energy input MU</th> <th>Unmetered sales MU</th> <th>Total sales MU</th> <th>T& D Loss MU</th> </tr> </thead> <tbody> <tr> <td>2016-17</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>2015-16</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>2014-15</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>2013-14</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Year/data	Energy input MU	Unmetered sales MU	Total sales MU	T& D Loss MU	2016-17					2015-16					2014-15					2013-14					<p>The requisite information is readily available in the RSF formats filed before the Honble Commission and which were also placed in the TSSPDCL website. However the information sought by the objector is given below:</p> <table border="1" data-bbox="1408 380 2322 831"> <thead> <tr> <th>Year/data</th> <th>Energy input MU (without EHT losses)</th> <th>Unmetered sales MU</th> <th>Total sales MU</th> <th>T& D Loss MU</th> </tr> </thead> <tbody> <tr> <td>2016-17</td> <td>34804</td> <td>8767.6</td> <td>30844.18</td> <td>5957.28</td> </tr> <tr> <td>2015-16</td> <td>32898</td> <td>6517.7</td> <td>29083.94</td> <td>5658.08</td> </tr> <tr> <td>2014-15</td> <td>32245</td> <td>6932.9</td> <td>28077.72</td> <td>5806.52</td> </tr> <tr> <td>2013-14(APCPDCL DATA)</td> <td>36717</td> <td>9190.5</td> <td>31869.73</td> <td>7255.62</td> </tr> </tbody> </table>	Year/data	Energy input MU (without EHT losses)	Unmetered sales MU	Total sales MU	T& D Loss MU	2016-17	34804	8767.6	30844.18	5957.28	2015-16	32898	6517.7	29083.94	5658.08	2014-15	32245	6932.9	28077.72	5806.52	2013-14(APCPDCL DATA)	36717	9190.5	31869.73	7255.62
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<p>15</p>	<p>Energy availability from TSGENCO thermal plants is projected with a PLF of 70% even when normative PLF is 80%. This implies under estimation of energy availability from TSGENCO thermal power plants. By projecting energy availability from TSGENCO thermal power plants with PLF of 70% instead of 80% DISCOMs have under estimated energy availability (excluding KTPS VII and BTPS) by 3,828 MU. With this total surplus at the disposal of Telangana state will be more than 7,000 MU.</p>	<p>As per the GoTS policy, the licensee has considered 24 hrs supply to agriculture from Jan 2018. This would result in higher demand during the day time and low demand during the night time. Across India, the PLFs of thermal power plants have seen a drop due to increased penetration of renewables in the grid. The installed capacity of solar power in Telangana is amongst the highest in the country, further the 24 hrs day time to agricultural consumers could lead to increased usage of power during day time. These factors could lead to drop in the actual despatch of power from the normative levels</p> <p>Currently, RSF formats of TSERC recognized monthly energy availability and dispatch. This is different from power demand and supply. Due to low loads in night time, PLF (based on actual dispatch) will be lesser than 80%. Licensees have projected 70% PLF</p>																																																		

		(not MW availability) for running MOD at month level. However, payments to the generator are being done based actual availability during the year.
16	While 1,120.90 MU of energy will be available from NTPC Simhadri Stage II only 828.24MU will be dispatched during the FY 2018-19 implying surplus of 292 MU.	NTPC Simhadri is not getting completely dispatched due to its relatively high variable costs as compared to other generators
17	TSDISCOMs reported that although availability had been shown for Machkund and Tungabhadra there was no scheduling to Telangana state since June 2017 (TSSPDCL, ARR p. 50). It has to be seen that legitimate share of Telangana state is restored.	APGENCO has given final regulation scheme with effect from 00:00 hrs of 11.06.2017 for regulating the power supply (100% TSDISCOMs share) from APGENCO stations including Tungabhadra and Machkunda stating that dues were not settled by TS DISCOMs. Hence the same was not considered for the projections.
18	Power purchase costs: Given the surplus power situation power from TSGENCO stations of KTPS VII and BTPS shall not be scheduled. From this step fixed cost burden to the extent of Rs. 709.79 Crore can be reduced. Also PPAs for KTPS VII and BTPS are yet to be approved by the Commission. Power from BTPS and KTPS VII shall not be scheduled without subjecting the related PPAs to public process and regulatory approval.	Power from KTPS VII and BTPS would be required to meet the growing energy requirements of the state. The licensee would enter into PPAs with these generating stations based on due approvals from the Hon'ble TSERC.
19	PPAs related to TSGENCO Hydel plants Priyadarsini Jurala and Punlichintala shall also go through public process and regulatory approval	TSDiscoms have entered PPAs with TSGENCO for Priyadarshini Jurala 6x39 MW and Pulichintala 4 x 30 MW Hydel stations on 22.12.2009 and 30.12.2010 respectively. Honble TSERC in its generation tariff order for the third control period 2014-19 has approved the fixed charges for these Hydel stations after duly conducting public hearing and regulatory approval process
20	According to ARR filings, "The variable cost per unit of KTPS (A,B,C) and KTPS V is based on 15% escalation over approved VC for 2017-18. KTPS VI and RTS B are based on 10% escalation over approved values for 2017-18." (TSSPDCL ARR p.57) No explanation for this escalation in variable cost is provided. This	The licensee while projecting the VC of TS Genco stations considered the actual VC of TS Genco stations in H1 of 2017-18 and the projected cost of VC as given by generators. In many instances, the actual costs were exceeding the approved values by more than 10%. However with a view of not imposing additional burden due to higher

	escalation shall not be allowed.	PP cost, the licensee has limited the escalation on VC to 10% of the approved value.
21	Variable cost of TSGENCO thermal power plants range From Rs. 2.21 to Rs. 2.70 per unit. Compared to this variable cost of CSPGCL is Rs. 1.20 per unit. Most of TSGENCO thermal plants are pit head based or located near to the coal mines. Due to this variable cost of TSGENCO shall be lower than that quoted by them. We request the Commission to scrutinize variable cost claims of TSGENCO thermal power plants.	<p>As per the clause 13.1(b) & (c) of TSERC regulations, the actual landed cost of fuel shall be claimed inclusive of fuel price corresponding to the grade/quality of fuel, royalty, taxes and duties as applicable, transportation cost by rail/ road/ pipeline or any other means, and, for the purpose of calculation of energy charges, shall be arrived at after considering transit losses. The landed cost of fuel in respect of TSGENCO stations s being arrived on the following</p> <ol style="list-style-type: none"> a. The Coal is being procured from M/s SCCL, a Govt. entity, and its Cost is being paid as per the price notifications of M/s SCCL. b. The Oil is being procured from central public sector undertakings viz. HPCL, IOCL &BPCL and the oil rates being paid prevailing on the date of Supply. c. The transportation charges of the fuel by rail are as per the rate circular issued by ministry of Railways. <p>The variable cost of the TSGENCO stations arrived by considering TSERC norms and the above information.</p>
22	While TSGENCO plants are projected to operate at 70% PLF through their normative PLF is 80% TPCIL is projected to operate at 90% PLF though its normative PLF is 85%. Supply of power over and above threshold PLF involves payment of incentive which will be an additional burden. Given surplus power availability power from TPCIL shall be scheduled up to threshold PLF i.e., 85% only.	As per the PPA with TPCIL, the normative PLF for recovery of fixed costs is 90%. Accordingly the PLF for TPCIL has been considered at 90%.
23	TSDISCOMs projected procurement of 383.46 MU from	The licensee while projecting the power purchase requirements has

	<p>bilateral/power exchange on short term basis. Given power surplus situation and over estimation of energy requirement procurement from bilateral/power exchange shall not be allowed.</p>	<p>done so by running the Merit order. The projected demand in the month of August is higher than the availability from contracted sources resulting in a marginal shortfall for 383.46 MU. This deficit is proposed to be met through bilateral/ power exchange.</p>
24	<p>According to ARR proposals of both the DISCOMs total Aggregate Revenue Requirement during FY 2018-19 will be Rs. 35,714.28 Crore. DISCOMs proposed changes to the HT Lift Irrigation Schemes (LIS) tariff and introduced new category for Electrical Vehicles (EV). DISCOMs also proposed Levy of Standby Charges. In the case of LIS they have claimed that the proposed changes at the state level will be revenue neutral. In the case of EV they did not indicate any quantum of electricity consumption. The TSDISCOMs requested the Commission to fix stand by charges but by themselves they did not estimate any income from this source during the ensuing year. After the proposed tariffs there will be a deficit of Rs. 9,770.98 Crore. How this deficit will be filled is not explained</p>	<p>The licensee has proposed that tariff for the purpose of charging electric vehicles would be same as the commercial tariff category at LT and HT based on the voltage of usage. The licensee is of the view that this would give clarity on tariff applicable for EVs. As the tariff for EVs is the respective commercial category tariff, revenue from this segment may not have material impact. The gap has to be met through suitable support from the Government after scrutiny of the gap by Hon'ble TSERC.</p>
25	<p>Tripartite MoU under UDAY signed by the DISCOMs and GoTS prescribed tariff hike of 6% (would have resulted in additional revenue of about Rs. 1,510 Crore) and subsidy from the state government to the extent of Rs. 5,000 Crore. Both these measures would not have been sufficient to meet the proposed deficit. In the past two years subsidy provided by the GoTS was less than that prescribed in the MoU.</p>	<p>The UDAY MOU signed by the licensee has prescribed tariff hikes and has not mandated any fixed level of subsidy. The deficit for the FY 2018-19 has to be bridged through suitable support from GoTS after scrutiny of the deficit by the Hon'ble TSERC.</p>
26	<p>Besides this, at the end of the FY 2016-17 after the tariff hike and the subsidy provided by the state government both the DISCOMs have run up a deficit of Rs. 6,474.53 Crore. Similarly, at the end of the FY 2017-18 the outstanding deficit is expected to be Rs. 6,824.59 Crore. This total deficit is Rs. 13,299.12 Crore. This is equal to 37.17% of the proposed ARR for FY 2018-19. The deficit at the end of the FY gives an impression that the tariff orders were tailored to fit in the tariff hike and subsidy proposed by the state</p>	<p>One of the major reasons for the losses incurred by TS SPDCL in 2017-18 and 2018-19 is due to the low level of agricultural sales approved by Hon'ble TSERC. The licensee submits that the level of agricultural sales projected for FY 2018-19 has been made on reasonable basis. The ARR proposal of TS Discoms has been made based on realistic basis to avoid any additional burden on the consumers in the state.</p>

	government and did not reflect the objective reality of the sector. As such the whole tariff determination exercise has become farcical.																					
27	<p>Arrears: According to ARR filings at the end of September 2017 both the DISCOMs together are facing arrears to the extent of Rs. 4,575.23 Crore from those who have to pay more than Rs. 50,000. Out of this SPDCL is facing arrears of Rs. 3,773.55 Crore which is equivalent to 16% of the proposed ARR for FY 2018-19. While SPDCL provided information on arrears consumer category wise NPDCL provided HT and LT category wise information only. We request the Commission to direct TSNPDCL to provide consumer category wise arrears data. Under SPDCL Rs. 1424.82 Crore are due from HT industrial units, Rs. 1541.17 Crore from street lights and PWS schemes and Rs. 564.17 Crore from lift irrigation schemes. According to Section 1.2 (i) of UDAY MoU “All outstanding dues from the state government departments to DISCOMs for supply of electricity shall be paid by 31.03.2017.” According to this document dues from state government departments as on 30.9.2016 were Rs. 2,416.62 Crore. Out of this Panchayat Raj accounted for Rs. 1,644.07 Crore, municipalities Rs. 139.53 Crore, Irrigation department Rs. 73.52 Crore and LIS Rs. 235.80 Crore. The present ARR filings show that the situation in fact deteriorated in spite of the UDAY MoU. Such huge arrears also involve significant financing costs. We request the Commission to direct the DISCOMs to take proactive steps to recover dues expeditiously.</p>					TSSPDCL has been addressing the DO letters continuously to the concerned HODs like Irrigation, Panchyat Raj, and Water works, HMWS&SB, Municipalities etc requesting to bridge the deficits/revenue gaps arising to TSSPDCL due to nonpayment of Electricity dues and payment are being received periodically.																
28	<p>Electrical accidents:</p> <table border="1"> <thead> <tr> <th></th> <th>2013-14</th> <th>2014-15</th> <th>2015-16</th> <th>2016-17</th> <th>2017-18 H1</th> </tr> </thead> <tbody> <tr> <td>SPDCL</td> <td>251</td> <td>307</td> <td>383</td> <td>349</td> <td>130</td> </tr> </tbody> </table>						2013-14	2014-15	2015-16	2016-17	2017-18 H1	SPDCL	251	307	383	349	130	Proportion of 85% of safety budget is allocated to rural circles where the accidents are on high side to take up the erection /rectification works like erection of intermediate poles wherever there are loose lines, erection of fencing, earthing etc, wherever necessitated.				
	2013-14	2014-15	2015-16	2016-17	2017-18 H1																	
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	NPDCL	185	147	139	329	173		Further Safety week is conducted to create awareness among the consumers about the precautionary measures to be taken. Also farmers are being educated by the local staff and advised not to meddle with live electrical equipment.																																																						
	Total	436	454	522	678	303																																																								
29	<p>The above table shows that over the period fatal accidents are increasing. Despite DISCOMs' claims about taking precautionary and preventive steps to avert accidents their number is on the rise. In the FY 2016-17 the number of fatal accidents reached 678. During the first half of FY 2017-18 already 303 people died due to electrical accidents.</p> <p><u>Circle wise fatal electrical accidents</u></p> <table border="1"> <thead> <tr> <th>Circle</th> <th>2013-14</th> <th>2014-15</th> <th>2015-16</th> <th>2016-17</th> <th>2017-18 H1</th> </tr> </thead> <tbody> <tr> <td>Mahabubnagar</td> <td>115</td> <td>124</td> <td>126</td> <td>96</td> <td>40</td> </tr> <tr> <td>Medak</td> <td>7</td> <td>91</td> <td>123</td> <td>101</td> <td>28</td> </tr> <tr> <td>Nalgonda</td> <td>84</td> <td>46</td> <td>64</td> <td>71</td> <td>18</td> </tr> <tr> <td>Rangareddy South</td> <td>18</td> <td>21</td> <td>32</td> <td>43</td> <td>22</td> </tr> <tr> <td>Warangal</td> <td>55</td> <td>45</td> <td>41</td> <td>87</td> <td>43</td> </tr> <tr> <td>Karimnagar</td> <td>34</td> <td>56</td> <td>23</td> <td>80</td> <td>47</td> </tr> <tr> <td>Nizamabad</td> <td>37</td> <td>25</td> <td>24</td> <td>59</td> <td>26</td> </tr> <tr> <td>Adilabad</td> <td>44</td> <td>10</td> <td>15</td> <td>82</td> <td>45</td> </tr> </tbody> </table>							Circle	2013-14	2014-15	2015-16	2016-17	2017-18 H1	Mahabubnagar	115	124	126	96	40	Medak	7	91	123	101	28	Nalgonda	84	46	64	71	18	Rangareddy South	18	21	32	43	22	Warangal	55	45	41	87	43	Karimnagar	34	56	23	80	47	Nizamabad	37	25	24	59	26	Adilabad	44	10	15	82	45	
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30	Mahabubnagar, Nalgonda, Medak+ Siddipet and Ranga Reddy-South Circles under SPDCL; Karimnagar, Warangal, Nizamabad and Adilabad Circles under NPDCL are recording high fatal accidents. There has to be special attention to analyse and reduce accidents in these circles.							Suggestion is noted.																																																						
31	NPDCL has given circle wise details of accidents and ex-gratia paid. But it has not given the break-up of numbers of public and department staff/contract staff. SPDCL has given these numbers in Form 2. Both DISCOMs should provide data in similar formats.							The data has been submitted as per the prescribed format of Hon'ble TSERC.																																																						
32	SPDCL has given a general answer listing the causes, but not							The reasons for accidents submitted in the ARR filing are as per the																																																						

	given the numbers. Hence it has not complied with the directive of the Commission. SPDCL should also give the break-up as done by NPDCL.	Format No. 20 of Central Electricity Authority which are submitted on regular intervals to CEA. Further the information on the number of accidents against the causes and the preventive measures adopted are submitted to the Hon'ble TSERC in compliance with the Directive No. 9.9.2
33	The Construction, Operation & Maintenance of electrical plant & lines especially at distribution level by DISCOMs is in a very unsafe condition. DISCOMs are not following the basic statutory safety regulations of CEA. The state government and its CEIG are not taking action on DISCOMs	The norms of fencing & minimum clearance as per I.E are in practice
34	At many places especially in rural areas, bare live parts in DTRs and associated bare lines and wires are not kept inaccessible to living beings. Barriers, fences and enclosures and minimum clearances to ground are not maintained so that live parts are out of reach to prevent fatal shocks as required in Regulations 58,17,37(1) and 44(1)(i) of CEA (Measures relating to safety and electric supply) Regulation, 2010	
35	For safety, isolating A B switches on H.V side of DTRs are to be kept in working condition as per Regulation 80(2)(a)(b) of CEA (Technical Standards for construction of electrical plants and lines) Regulations, 2010. At many DTRs, A B switches are stuck in closed position and do not open.	The defective DTR AB Switches are being repaired on regular basis.
36	As per Regulations 74(1) (2) of CEA (Measures relating to safety and electric supply) Regulation, 2010 and Regulation 78(1) and (2) of CEA (Technical Standards for construction of electrical plants and lines) Regulations, 2010, on all DTRs on H.V sides of transformers, surge diverters are to be provided to protect consumers against transient over voltages due to lightning and switching surges and protect consumers equipment getting damaged. But in almost all DTRs these are not in working condition and are disconnected.	As per CEA all the DTRs purchased are provided with LAs/surge diverters. However in few cases the DTRs surge diverters are disconnected due to short circuit of the same (defect).

37	<p>The statutory CEA (Safety requirements for construction, operation and maintenance of electrical plants and electric lines) Regulations, 2011 give very important and elaborate policy and management systems for ensuring electrical safety. Regulation 4(4) requires the supplier to provide physical/financial resources for safety management, internal and external audit of safety. Regulation 5 requires preparation and application of detailed safety manuals/ It gives what matters are to be covered (Refer schedule I & II). Regulations 6(1)(c)(ii) requires appointment of a very senior level officer for safety, working directly under Chief Executive. Regulations 6(1)(d)(e)(f)(g) gives his functions and duties like periodic inspection, audit, training, advising management on prevention of injuries. Regulation 5 of CEA (Measures relating to safety and electric supply) Regulations 2010 which is being revised also deals with electrical safety officer and authorized Chartered electrical safety engineer for periodical testing and to conform to Regulation 30 & 43.</p>	<p>Hon'ble TSERC vide the 3rd Control period Tariff Order has approved an amount of Rs 200 Crs.(5 years) as special appropriation for Safety measures, In compliance to the same, TSSPDCL is allocating the same to the circles on yearly basis to carry out various works like providing of intermediate poles, raising plinths and earthing etc.</p>
38	<p>To the best of our knowledge TSDISCOMs are not implementing the above mandatory regulations. TSERC is requested to order TSDISCOMs to submit detailed report and evidence to show their top down commitment to these management level Regulations.</p>	<p>As per the TSERC directions, TSSPDCL has nominated Officer of the cadre of Divisional Engineer/ Construction of each circle as Safety officer vide Memo No. CGM(O&M)/SE(O&M)/DE(O&M)-I/F. /D.No. 2272/17 dt. 01.03.17.</p>
39	<p>Public awareness is very important in promoting electrical safety. TSDISCOMs do not have any materials even in their websites for creating awareness in safety among general public and consumers. Recently IEEE Hyderabad Section produced a video film (https://www.youtube.com/watch?v=a_7rRUxhvVs) and designed posters on electrical safety. These may be used by TSDISCOMs in their work on promoting electrical safety.</p>	<p>The suggestion is noted.</p>
40	<p>Accident statements / statistics are not available to public. These must be kept in public domain and submitted annually to E R C.</p>	<p>The statistics on accidents are submitted on regular intervals to CEA. Also the information on number of accidents is provided in the ARR filings which are available to the public.</p>

	Many Circles in DISCOMs do not discharge their statutory duty of informing details of accidents to CEIG. Auditing and accident investigations need to be reviewed by an independent agency like E R C. Action is not taken many a time by DISCOMs even when dangerous conditions are brought to the notice by public and media.	On occurrence of accident the same is informed to CEIG within 24 hours. Whenever brought to the notice of TSSPDCL officials, the rectification action is generally taken however in certain cases where the accident is on account of consumer negligence i.e construction of building without maintaining sufficient clearance to already existing lines, intimation for payment for taking up the work is given.																																																	
41	There is need to improve compensation payment to victims families. In the case of SPDCL during FY 2016-17 out of 349 fatal accidents compensation was paid in 180 cases and during FY 2017-18 H1 out of 130 fatal accidents only 23 victims families received compensation. In the case of NPDCL during FY 2016-17 out of 329 fatal accidents compensation was paid in 222 cases and during FY 2017-18 H1 out of 173 fatal accidents 144 victims families received compensation. During FY 2016-17 exgratia has been paid to 59% cases in TS, 52% in SPDCL and 67% in NPDCL.	All the cases where the necessary documents are submitted such as FIR, postmortem, legal heir, panchanama, death certificate, exgratia proposals are sanctioned without any delay. For the convenience of the consumer, weblink for uploading the required documents has also been provided in the TSSPDCL website.																																																	
42	<p>DTR Failures:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>DTR Particulars</th> <th>SPDCL</th> <th>Mahabu bnagar Circle</th> <th>NPDCL</th> <th>Warangal Circle</th> </tr> </thead> <tbody> <tr> <td rowspan="3">2013-14</td> <td>Total DTRs</td> <td>2,54,603</td> <td>54,807</td> <td>2,09,195</td> <td>48,350</td> </tr> <tr> <td>DTRs failed and replaced</td> <td>42,278</td> <td>13,074</td> <td>30,666</td> <td>8,648</td> </tr> <tr> <td>% of DTRs failed and replaced</td> <td>16.01</td> <td>23.85</td> <td>14.66</td> <td>17.89</td> </tr> <tr> <td rowspan="3">2014-15</td> <td>Total DTRs</td> <td>2,55,489</td> <td>54,807</td> <td>2,26,885</td> <td>55,078</td> </tr> <tr> <td>DTRs failed and replaced</td> <td>35,045</td> <td>12,419</td> <td>28,604</td> <td>7,407</td> </tr> <tr> <td>% of DTRs failed and replaced</td> <td>13.72</td> <td>22.66</td> <td>12.61</td> <td>13.45</td> </tr> <tr> <td rowspan="2">2015-16</td> <td>Total DTRs</td> <td>2,92,654</td> <td>63,740</td> <td>2,42,539</td> <td>59,343</td> </tr> <tr> <td>DTRs failed and</td> <td>31,267</td> <td>10,049</td> <td>28,031</td> <td>8,108</td> </tr> </tbody> </table>	Year	DTR Particulars	SPDCL	Mahabu bnagar Circle	NPDCL	Warangal Circle	2013-14	Total DTRs	2,54,603	54,807	2,09,195	48,350	DTRs failed and replaced	42,278	13,074	30,666	8,648	% of DTRs failed and replaced	16.01	23.85	14.66	17.89	2014-15	Total DTRs	2,55,489	54,807	2,26,885	55,078	DTRs failed and replaced	35,045	12,419	28,604	7,407	% of DTRs failed and replaced	13.72	22.66	12.61	13.45	2015-16	Total DTRs	2,92,654	63,740	2,42,539	59,343	DTRs failed and	31,267	10,049	28,031	8,108	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. With the above measuers in TSSPDCL, the DTR Failure rate has come down. During FY 2017-18, the total no. of DTRs as on Dec'17 is 3,70,113 while the no. of failed DTRs is 25,144 i.e., 6.79%. In Mahabubnagar circle the no. of DTRs existing in Dec'17 are 29,155 & the no. of failed DTRs is 2486 i.e., 8.53%.
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	2016-17	Total DTRs	3,18,765	67,412	2,55,087	59,528	
		DTRs failed and replaced	40,199	11,522	32,360	8,644	
		% of DTRs failed and replaced	12.61	17.09	12.67	14.52	
43	<p>Every year more than 10% of the DTRs in the state are failing and need to be attended to. Though over the period there is decline in percentage of DTRs failing still the existing levels of failure is unacceptable. Special attention needs to be paid to circles with high failure rate. Mahabubnagar circle's (under SPDCL) performance needs to be thoroughly scrutinized. In 2016-17 more than 17% of the DTRs in this circle need to be repaired. This also indicates the quality of service the consumers in that circles are receiving. Incidentally, Mahabubnagar circle is regularly recording high rate of fatal accidents in the state. Procurement, operation and maintenance, and repair of these DTRs need to be examined.</p>						
44	<p>These tables refer to DTs replaced. Consumer supply is affected also due to DT failure, 11 kV feeder outage, 33 kV feeder outage etc. From the information provided, it is not possible to get an idea of the total duration of outage faced by the consumer. Considering the nearly all households have connection and the objective is to provide 24 x 7 power supply to all consumers, the focus of the DISCOMs now should be closely monitor the quality of supply. We request the DISCOMs to provide circle wise information about quality of supply over the past few years. Suggested format is given below: DISCOM name: Year:</p>						
	<p>The information on Feeder Outages is already available in performance reports (Format 5, Format 6a and Format 6b) of the ARR filings.</p>						

Circle	Number of consumers	Outage hours/consumer due to fuse off	Outage hours/consumer due service wire	Outage hours/consumer due to DT	Outage hours/consumer due 11 kV feeder	Outage hours/consumer due to 33 kV feeder

S.No.	Summary of Objections / Suggestions	Response of the Licensee
6	GMR Aero towers, Rajiv Gandhi International Airport , Shamshabad, Hyderabad 500 018. Telangana State, India, www.hyderabad.aero	
i	<p>It has been proposed that the loads should be segregated between aviation activity loads and non-aviation activity loads at the Airport</p> <p>In this regard we would like to submit that, the issue with respect to segregation of loads at the Airport was long settled by the Hon'ble Commission pursuant to the clarification given by the erstwhile APCPDCL that segregation of loads is not possible</p> <p>The erstwhile APCPDCL had indeed contended as under before the Hon'ble Commission</p> <ol style="list-style-type: none"> a. The entire distribution activity is done through under Ground Cable system. Hence, it is not possible to inspect premises nad identify physical source and destination of supply and load point from where it is emanating and to which loads it is feeding. b. Due to Bus Coupler arrangement (Ring main Arrangement), shifting of loads from non-aviation activity to aviation activity at any point of time by operating the bus couplers may take place. As such, it is not possible to monitor such instances every time as the area is vast and that too under high security zone. c. Most importantly, the purpose of power for both commercial activity and aviation activity in one contiguous area without any clear demarcation is not in compliance with the provisions of GTCS. d. For the reasons mentioned above, it is not technically possible to segregate the loads between aviation and non-aviation activity with present arrangement. 	<p>The APTEL allowed the appeal filed by M/s. GMR and passed its order dt. 22.07.2011 based on the orders issued by APTEL in Mumbai Airport case stating as below:</p> <p><i>“The State Commission could have differential tariff for the aviation as well as for the purely commercial activities, such as shops, restaurant, etc., at the airport. However, if it is not feasible to have separate metering arrangements for the aviation activities and purely commercial activities, then the State Commission could re categorize the appellant in a separate category other than HT Commercial II and determine the composite tariff for aviation and the commercial activities of the appellant.”</i></p> <p>Later, a Civil Appeal vide C.A. 7525 of 2011 has been filed before the Hon'ble Supreme Court on Mumbai International Airport by the Reliance Infrastructure Ltd. challenging the orders passed by APTEL in Appeal No.195 of 2009. The Hon'ble Supreme Court allowed the appeal and passed interim orders directing MERC to conclude the remand proceedings, but not to implement the same.</p> <p>Therefore, the erstwhile APCPDCL has also filed an appeal against the orders passed by the APTEL in Appeal No.12 of 2011, before the Supreme Court vide Civil Appeal No. 1954/2012. The</p>

<p>The hon'ble State Commission considering the aforesaid observation and taking due cognizance of several other techno-legal problems that would arise pursuant to the segregation of loads have observed that "if it is not feasible to have separate metering arrangements for the aviation activities and purely commercial activities, then the State Commission could recategorize GHIAL in a separate category other than HT Commercial II and determine the composite tariff for aviation and the commercial activities by creating a new HT Category titled HT-III, Airports, Railway Stations and Bus Stations. The said arrangement has been duly implemented and followed all these years since the separate metering issue was already addressed to by the Hon'ble State Commission by creating a separate category viz., HT III category. As the said issue of segregation and separate metering has already been decided and closed, the same cannot be sought to be re-opened again by the DISCOM</p>	<p>Hon'ble Supreme Court vide its orders dt. 03.02.2012 held that Appeal is admitted Tag with Appeal No. 7525 of 2011. Thus the appeal filed by the erstwhile APCPDCL was clubbed with Appeal filed on Mumbai Airport. Consequently the interim orders passed in Mumbai Airport case mutatis-mutandis applies to this case.</p> <p>The Commission has created HT-III category in Tariff Order for FY 2012-13 for aviation activity at airports and stated that non-aviation activities shall be billed in HT-II category, for which the segregation of loads at airport is necessary. In course of time, several techno legal problems have arisen for implementation of this tariff and the Hon'ble Commission also prefers to await the decision of the Hon'ble Supreme Court of India on this matter, as stated in Tariff Order for FY2013-14.</p> <p>Hence the issue of Segregation of loads at airport and separate metering is not yet closed as the Civil Appeal No. 1954/2012 is still pending before the Hon'ble Supreme Court and the matter is under sub-judice.</p>
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S.No.	Summary of Objections / Suggestions	Response of the Licensee
7. T. Balraj, Amdapur village, moinabad mandal, RR district		
i	<p>నేను AGL D . D కట్టిన తరువాత Estimate Created date 08 -10 -2015 నాడు Estimate అయినది, కానీ ఇప్పటి వరకు నా యొక్క వ్యవసాయ (AGL) బోరు దగ్గర స్తంబాలు వేయలేదు. తరువాత చాలా మంది విద్యుత్ అధికారులను సంప్రదించిన ప్రయోజనములేదు. ఇప్పటి కైన తమరు సంబంధిత అధికారుల పై చర్య తీసుకొని నాకు న్యాయము చేయగలరని నా యొక్క మనవి.</p>	<p>పని పూర్తియైనది. సర్వీస్ (నెంబర్ 8102 00903) రిలీజ్ చేయబడినది</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
8. Madi Reddy Raji Reddy, 20-160/1/1, R-13. Nagar, shamshabad, Ranga Reddy, Pin 501218. Cell No. 9848252628.		
1	<p>మన సిబ్బంది DE ADE AE SE లు తమ ఫోన్ లో వాట్సాప్ రాకుండా లేదా వాట్సాప్ లేని ఫోన్ లు ఉపయోగించుచున్నారు. పర్సనల్ గా వేరే నెంబర్ తో నెట్ వాట్సాప్ లు సర్కారీ నెట్ వాడుచు ఎంజాయ్ చేయుచున్నారు. వినియోగదారులకు 24 గంటలు వాట్సాప్ ఫోన్ లు అందుబాటులో ఉంచి వారిని మరణాల నుండి కాపాడాలని కోరుచున్నాను :- వాట్సాప్ కంప్లైంట్లు స్వీకరించు వ్యవస్థ చేయాలని కోరుచున్నాను.</p>	<p>వాట్సాప్ ద్వారా అన్ని రకాల కంప్లైంట్ స్వీకరణ పరిశీలించగలము. మొబైల్ యాప్ (TSSPDCL Mobile APP) ద్వారా ఫిర్యాదును నమోదు చేసుకోవచ్చు.</p>
2	<p>ట్రాన్స్ఫార్మర్లు పూర్తిగా డిపార్టుమెంటు వారి సొత్తు. వాటిని రైతులు తమ ట్రాక్టర్ల పై ఎడ్ల బండ్ల పై తెచ్చి ప్రమాదాలకు గురి అయి రాష్ట్రంలో నెలకు 10మంది వరకు చనిపోవుచున్నారు. డిపార్టుమెంటు ట్రాన్స్ఫార్మర్లు రైతులు తీసుకెళ్ళినప్పుడు వారిపై దొంగతనము కేసు నమోదు చేయండి. తద్వారా రైతులు చనిపోవడం ఆగుతుంది. అట్లే రైతులు ట్రాన్స్ఫార్మర్ దగ్గర ఫ్యూజ్ వేసినప్పుడు కూడా తగు చర్యలు తీసుకోవాలని కోరుచున్నాను.</p>	<p>ట్రాన్స్ఫార్మర్లు పూర్తిగా డిపార్టుమెంటు వారి సొత్తు అన్న విషయం వాస్తవమే ట్రాన్స్ఫార్మర్ కాలిపోయినప్పుడు రైతులు సంబంధిత అధికారులకు తెలియజేసి విద్యుత్ సంస్థకు సంబంధించిన వాహనాలు వాడవలసిందిగా ఖచ్చితమైన ఆదేశాలు ఇవ్వటం జరిగింది. కొన్ని చోట్ల రైతులు క్షేత్ర స్థాయి సిబ్బందికి తెలియచేయకుండానే వారికి అందుబాటులో ఉన్న సౌకర్యాలు ఉపయోగించుకున్నారు. అట్లాగే ట్రాన్స్ఫార్మర్ ఫుజ్ దగ్గర ఉన్న సంబంధిత లైన్ మెన్ కి తెలియకుండానే వారంతట వారే వేసుకొని ప్రమాదాల బారిన పడుతున్నారు.</p>
3	<p>రైతులు తమ సొంత కర్చులతో తామే ట్రాన్స్ఫార్మర్ ను దింపి 5 , 6 వేల రూపాయలు లంచాలు (కర్చులు కలుపొకొని) ఇచ్చినచో 5 , 6 గంటలలో ట్రాన్స్ఫార్మర్ ను మార్చుకొనుచున్నారు. ఇట్టి ట్రాన్స్ఫార్మర్ మార్పు 5-6గంటలలోనే జరుగుచున్నది. కావున ట్రాన్స్ఫార్మర్ మార్చడానికి 6 గంటలలోనే జరగాలని తమరు నిబంధన విధించగలరని మనవి.</p>	<p>అలాంటి కేసులు ఏవైనా ఉన్నట్లయితే సంబంధిత అధికారులకు తెలియజేస్తే అట్టి వారిపై క్రమశిక్షణ చర్యలు తీసుకోబడును.</p>
4	<p>ట్రాన్స్ఫార్మర్ ఫ్యూజ్ వేయడం కోసం తగు సిబ్బందిని అలర్ట్ గా ఉంచి 15నిమిషముల లోపు వేయునట్లు చూడగలరు. నగరాలలో వేసినట్లు వ్యవసాయ ట్రాన్స్ఫార్మర్లు మార్చడానికి</p>	<p>ట్రాన్స్ఫార్మర్ ఫ్యూజ్ వేయడం కోసం సంస్థ సిబ్బందికి సాధ్యమైనంత త్వరలో పునరుద్ధరింప చేయడానికి ఆదేశాలు ఇవ్వడం జరిగింది.</p>

	<p>తగినన్ని వాహనములు ఏర్పాటు చేయించగలరని, అట్టి వాహనములు వాటికే ఉపయోగించాలని ముఖ్యంగా కరెంటు కాంట్రాక్టర్లకు అప్పగించరాదని, 24 గంటలు అంటులెన్ను లాగా అందుబాటులో ఉంచాలని కోరుచున్నాము.</p>	
5	<p>4 అప్ 2013 ప్రకారం 11KV లైను, ట్రాన్స్ఫార్మర్ దిమ్మ, ట్రాన్స్ఫార్మర్ వరకు డిపార్టుమెంటు భరించాలని ఉన్నప్పటికీ డిపార్టుమెంటు ఆలా చేయక రైతులకు కేటాయించిన బడ్జెట్ నుండి వాడుచున్నారు. తద్వారా రైతుల ఎస్టిమేషన్ లిమిట్ దాటి పోవడం, అట్టి ఎక్కువ డబ్బులు రైతులు చెల్లించక కర్రల పైనే కరెంటు తీసుకు వెళ్లి మరణాలకు గురి అగుచున్నారు. కావున 4 అప్ 2013 ప్రకారము ట్రాన్స్ఫార్మర్ వరకు డిపార్టుమెంటు భరించాలి.</p>	<p>రెగ్యులేషన్ 4 అప్ 2013 ప్రకారం అగ్రికల్చర్ ట్రాన్స్ఫార్మర్ ను డిపార్టుమెంటు వారు సొంత ఖర్చులతో ఏర్పాటు చేయడం జరుగుతుంది. ఒకవేళ హై టెన్షన్ విద్యుత్ వినియోగదారుడు DTR ని అతను కొనుక్కున్నచో, అంతవరకు డెవలప్ మెంట్ చార్జీలలో మినహాయింపు ఇవ్వడం జరుగుతుంది. రైతు చైతన్య/ అవగాహనా సదస్సులు, CGRF మరియు TSERC మీటింగ్ లలో వినియోగదారులకు ఈ విషయాలు తెలియజేయడం జరుగుతుంది.</p>
6	<p>రాష్ట్రంలో ఇప్పటి వరకు కర్రల పై AGL కనెక్షన్లుండే బిల్లు చెల్లింపు కనెక్షన్ ఉండి బిల్లు చెలింపు జరుగుచున్నవి. మానవతా దృష్టితో డిపార్టుమెంటు వారు స్తంభాలు వేయాలని BKS రాష్ట్ర విద్యుత్ ప్రముకంగా ముఖ్యంగా విన్నపం చేయుచున్నాము.</p>	<p>కర్రలపై ఉన్న వైర్ లను దశల వారీగా స్తంభాల మీదికి మార్చడం జరుగుతుంది</p>
7	<p>గౌరవనీయులు తరచూ ఉన్నత పురస్కారాలు పొందే మన CMD గారు మా సిబ్బంది లంచం అడిగినచో ACBకి పట్టించమని తరుచు చెప్పుచుంటారు. అయ్యా AGL సీనియారిటీ లిస్టు చూడండి ప్రతి మండలంలో సరాసరి 10మంది రైతులకు పైననే వర్క్ కంప్లీట్ అని ఉన్నది. వారు బిల్లులు చెల్లించుచున్నారు. కానీ వారికి స్తంభాలు లేవు, ట్రాన్స్ఫార్మర్లు లేవు. మరి అట్టి స్తంభాలు, ట్రాన్స్ఫార్మర్లు వాటికి సంబంధించిన మెటీరియల్ ఏమైయుంటుంది పెద్దసారు. ఇది అనేక సంవత్సరములుగా నడుచుచున్న వ్యవహారం. రైతు వెళ్లి అడగగా నీ AGL కనెక్షన్ సీనియార్టీ రాలేదు ఇంకా టైం పడుతుంది అని కాలయాపన చేస్తున్నారు. సంవత్సరములు గడిపి ఆ పైల్ మిస్స్ అయినది కొత్తగా అప్లై చేయండి ఇన్ని రోజులు ఉచితంగానే (బిల్లుకట్టకుండానే) వాడుకున్నావు కదా అని కొత్తగా అప్లై చేయించుచున్నారు. అట్టి పాత మెటీరియల్ కాంట్రాక్టర్ సిబ్బంది XYZ లు అందరు అప్పనంగా తిని వేయుచున్నారు. దానిపై ఏ ACBకి మన పెద్దసారు</p>	<p>పూర్తి వివరాలు అందించినచో తగిన చర్యలు తీసుకుంటాము.</p>

	అప్పచెప్పుతారో వేచిచూద్దాం. రాష్ట్ర వ్యాప్తంగా AGL కంప్లైంట్లు అని ఉన్న అన్ని పనులు వెంటనే చేయించి ఆ విధంగా తప్పు తోవ పట్టించిన అందరి అధికారులు కాంట్రాక్టర్ల పై తగు చర్యలు ఆదేశించాలని కోరుచున్నాము.	
8	ఇట్టి సర్వీసు వైర్ల కారణంగా అనేక మంది రైతులు చనిపోయారు భవిష్యత్తులో కూడా చనిపోయినారు. భవిష్యత్తులో కూడా చనిపోవడం జరుగును కావున ఇప్పటి వరకు గ్రామాలలో వ్యవసాయ పొలంలో ఉన్న కట్టలనన్నింటినీ తొలగించి స్తంభాలు పాతి వైర్లు లాగి, అవసరమైన చోట అదనపు ట్రాన్స్‌ఫార్మర్లు బిగించవలసిన భాద్యత AGL మెటీరియల్ దొంగిలించిన వారిపై దాన్ని చూస్తున్న అధికారుల పై ఉన్నది.	కట్టల పైన సర్వీస్ వైర్లు ఉన్న చోట సంస్థ తరుపున సరి చేయుటకు సంబంధిత ఆదేశాలు ఇవ్వడం జరిగింది. అక్రమ కనెక్షన్లు ఉన్నచో DD లు కట్టించుకొని లైన్స్ పోల్స్ ఇవ్వబడును. వ్యవసాయ ట్రాన్స్‌ఫార్మర్ దొంగతనం జరిగినచోట దొంగలపై పోలీసులకి కేత్ర స్థాయిలో ఆదేశాలు ఇవ్వడం జరిగింది. అంతేకాకుండా దొంగలించబడ్డ సామాను బదులు డిపార్టుమెంటు సామాను ఇచ్చి సరఫరా పునరుద్ధరించబడును.
9	ట్రాన్స్‌ఫార్మర్ బుష్ లు మిగతా విడిభాగములు ADE , DE ఆఫీసులు ఉన్న స్థలంలో ప్రక్కన దుకాణములలో అమ్ముచున్నారు. వ్యవసాయ క్షేత్రంలోని ట్రాన్స్‌ఫార్మర్లు పూర్తిగా డిపార్టుమెంటు వారివే. వాటికి సంబంధించిన విడిభాగములు పైవేటు దుకాణాలలో లభించడము వెనుక ఏమి మతలబు. మీ ట్రాన్స్‌ఫార్మర్లకు మేము బుషులు విడిభాగాలు తెచ్చి ఇవ్వడమేమిటి. గ్రామాలలో అట్టి దుకాణాలు వెలియడము అంటే డిపార్టుమెంటు వస్తువులే అక్కడ పెట్టి మీరు అమ్ముకోవడమే కాదా! అట్ల కానట్లయితే ఇంత వరకు మండలము వారిగా పైవేటు దుకాణాలలో తెచ్చి వేసిన వాటి వివరములు ఇవ్వగలరు.	ట్రాన్స్‌ఫార్మర్ బుష్ లు మిగతా విడిభాగములు ADE , DE ఆఫీసులు ఉన్న స్థలంలో ప్రక్కన దుకాణములలో అమ్ముచున్నారు అని అనడంలో వాస్తవం లేదు ఇలాంటి సంగతులు ఉంటే సంస్థ దృష్టికి తీసుకు వస్తే సంబంధితులపై తగిన చేర్య తీసుకోబడును. ట్రాన్స్‌ఫార్మర్ బుషులు మరియు ఇతర విడి భాగాలు అవసరమైన చోట సంబంధిత ప్రాంత అధికారుల దగ్గర నుండి పొందవచ్చు.
10	రైతులు కరెంటు బిల్లులు చెలించాలని DD లు చెలించి సాంక్షన్ తీసుకోవాలని మా BKS సూచిస్తుంది. డిపార్టుమెంటు వారు ట్రాన్స్‌ఫార్మర్ క్రింద కొంతమంది రైతులు బిల్లులు చెల్లించకుంటే మొత్తం ట్రాన్స్‌ఫార్మర్ల డిస్కనెక్షన్ చేయుచున్నారు. DE SE లు కూడా మద్దతు తెలుపుచున్నారు. ఇలా కాకుండా బిల్లులు చెలించని వారి కనెక్షన్లు తొలిగించాలని బిల్లులు చెలించిన వారికి అంతరాయం కలిగించరాదనీ విన్నవిస్తున్నాను. ఇక ముందర ఇలా	రైతులు సకాలంలో కరెంట్ బిల్లులు చెల్లించి సంస్థకు సహకరించాలని మనవి. అట్టి ట్రాన్స్‌ఫార్మర్ నుండి సరఫరా పొందుతున్న రైతు ఎవరైనా కరెంటు బిల్లు కట్టలేదని ట్రాన్స్‌ఫార్మర్ ను బండ్ చేసినట్టు ఏదైనా జరుగుతే సంబంధిత పై అధికారికి తెలియజేయగలరు.

	ట్రాన్స్ఫార్మర్ల డిస్కనెక్షన్ చేసిన మా జీవించే హక్కుకు భంగం కలిగించడము మమ్మలను మానసికంగా హింసించిన వారగుదురు. వారి పై క్రిమినల్ కేసు పెట్టుటకు ERC వారు శాశనం చేయాలని కోరుచున్నాను	
11	హనరబుల్ కమిషన్ వారు ఇచ్చిన ఆదేశాన్ని సంస్థ మరియు వినియోగదారులు వినవలసినదే కాదా! ఆలా మీ ఆదేశాన్ని 4/2013ను 5సంవత్సరములుగా అనుసరించని సంస్థ పై తగు చర్యలు తోసుకోవాలని కమిషన్ వారిని కోరుచున్నాను.	HT/LT లైన్ మరియు డిస్ట్రిబ్యూషన్ ట్రాన్స్ఫార్మర్ల పనులకు , ఒక్కో పంపుసెట్టుకు రూ .70,000/- ల ఖర్చు TSSPDCL భరించును. డిస్ట్రిబ్యూషన్ ట్రాన్స్ఫార్మర్ల లేకుండా LT లైన్ మాత్రమే ఉన్న సందర్భంలో, పంపు సెట్ కు రూ .40,000/- ఖర్చు TSSPDCL భరించును. Estimateకి అయే ఖర్చు పై చెప్పిన మొత్తాన్ని మించినచో, మిగిలిన మొత్తాన్ని వినియోగదారుడు భరించవలసి ఉంటుంది.
12	k. లక్ష్మీనారాయణ గారు 13 -7 -2017న డి.డి చెలించినారు.14 -12 -2017 వరకు అతని పేరు సీనియార్డ్ లిస్టులో లేదు. అతడు తన సమస్యను వివరిస్తూ 14 -12 -15 న CGRF కు దరఖాస్తు చేసుకోగా 2 నెలలలో పనిచేస్తామని అతని సీనియార్డ్ నెంబర్ 68 అని చెప్పినారు :- ఐదు నెలలుగా డి.డి చెలించిన రైతు పేరు AGL లిస్టులో ఎంట్రీ చేయక పోవడము పైన ఎలాంటి చర్య తీసుకొని CGRF నిర్ణయం పై కూడా తమరు పరిశీలించగలరని మనవి. ఈ రోజు వరకు పని జరగలేదు.	సీనియారిటీ ప్రకారం పనులు చేయడం జరుగుతున్నది.ప్రస్తుతం మీ సీనియారిటీ నెంబర్ 29 .01 .2018 నాటికి 61 గా ఉన్నది.
13	(1)B. కృష్ణరెడ్డి S /o వెంకటరెడ్డి (2) శ్రీధరరెడ్డి (3) మల్లారెడ్డి s /o సాయిరెడ్డి గార్లు రేగడి చిలకమర్రి, కొండూరుమండలం, శాద్ నగర్ డివిజన్ రైతులు AGL గురించి దరఖాస్తు చేసుకున్నారు. ఇద్దరికి కరెంటు బిల్లు కూడా వచ్చుచున్నది. ఆఫీసు కు వెళ్లగా మెటీరియల్ రాలేదు, లిస్టు వేటింగులో ఉన్నది అనుచున్నారు. సిస్టంలో చూడగా వర్క్ కంప్లీట్ అని ఉన్నది. ఈ భాగవతం రాష్ట్రములోని సుమారు అన్ని మండలములలో ఉన్నది అన్నది . సత్యం తమరు పరిశీలించగలరు. కాపీ జత చేయుచున్నాను .	మీ estimate మంజూరు అయినది. వర్క్ ఆర్డర్ తీసుకున్న తర్వాత నెల రోజులలో పూర్తి చేస్తాము.

14	<p>B. ఉమ భర్త శ్రీనివాస్ రెడ్డి బోరు బావికి D.D కట్టి 4 నెలలు అయినందున NR 515172068741</p> <p>K కృష్ణయ్య s /o రామయ్య బోరు బావికి D.D కట్టి 7 నెలలు అయినందున NR 515172068759</p> <p>K శ్రీరాములు s /o దశరథ బోరు బావికి D.D కట్టి 7 నెలలు అయినందున NR 515172068751</p> <p>G వెంకట్రెడ్డి S / o రాంరెడ్డి బోరు బావికి D.D కట్టి 7 నెలలు అయినందున మెయిన్ లైన్ షాబాద్ రోడ్ నుండి ఊబగుంట వరకు loose గా ఉన్నది.</p> <p>B.కృష్ణారెడ్డి S / o వెంకట్ రెడ్డి బోరు బావికి 2 D.D లు కట్టి 06-01 -2016 నాడు D.D కట్టినాము. ఇంతవరకు material లేదు work కాలేదు. బిల్లు వచ్చుచున్నది.</p> <p>ఎల్గొండ శ్రీనివాస్ రెడ్డి బోరు బావి D.D 26 -10 -2017 NR 515172165348 work complete కాలేదు.system లో complete అయినాట్లు చూపించారు.</p> <p>A.మల్లారెడ్డి S / o శాయి రెడ్డి 2 poles అవసరము కట్టలపై Bore Motor నడుస్తున్నది. CGRF లో Application పెట్టడం జరిగింది .work కాలేదు.</p> <p>CGRF లో application ఇచ్చినాము. 22-08-2017 రోజున ఇచ్చినాము. work complete అయినట్లు letters వచ్చినాయి.కానీ work complete కాలేదు . 1 నుండి 4no. వరకు చూపిన పనులన్ని System లో completed అని చూపినారు.కానీ field లో ఏ పని కాలేదు. వారి పై చట్ట రీత్య చర్య తీసుకోవలయును.</p> <p>1948లో బిగించిన వైర్లు ఇంత వరకు మార్చలేదు. Lines అన్ని loose అయినవి.వాటిని మార్చాలి .CGRF లోloose connection కొరకు పెట్టిన application sanction అయింది.</p>
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	AE గారు poles తీసుకుపోమన్నాడు.	
15	ఊరిలో ఏ ట్రాన్స్ఫార్మర్ కూడా ON & OFF switches లేవు. ఏ చిన్ని విషయానికి LC తీసుకోవలసి వస్తుంది. గ్రామంలో ఏ చిన్ని సమస్య వచ్చిన LC అడగవలసి వస్తుంది.	అందరికీ 24 గంటల సరఫరాలో భాగంగా వినియోగదారులకు ఎలాంటి అంతరాయం కలగకుండా ఉండడానికి ఎక్కడైనా AB స్వీచులు లేని DTRs కి improvement లో త్వరితగతిన అనుమతులు యిచ్చి DTRs కి ఆన్ and ఆఫ్ స్వీచులు అమర్చడం జరుగుతుంది.
16	Bridge కాడ లారీలకు వైర్లు తగులుచున్నవి. పత్తి లారీలు అంటాకుంటున్నాయి. వాటిని తగలకుండా చేయాలి.	స్టాండర్డ్ క్లియరెన్స్ మెయింటెన్ చేయడానికి ఆదేశాలు ఇవ్వడం జరిగింది
17	ట్రాన్స్ఫార్మర్ LT లైన్లన్నీ నెత్తులకు తగులు చున్నవి. వాటిని సరిచేయవలెను. B. సత్తమ్మ భర్త అంజిరెడ్డి గారికి ట్రాన్స్ఫార్మర్ ఇచ్చినారు. దాదాపు 1 సం రము అయింది. LT Lines ఇవ్వలేదు. poles వేయడము జరిగింది. line ఏర్పాటు చేయలేదు.	పూర్తి వివరాలు అందించినచో తగిన చర్యలు తీసుకుంటాము.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
9. B. Ramulu & G. Srinivas Reddy, Amdapur Village, Moinabad mandal, RR-District, Cell. No. 9010404155		
i	<p>మేము ఇద్దరమూ వ్యవసాయం కొరకు కొత్త విద్యుత్ Transformersకు, 2015 సంవత్సరంలో నాలుగు (4) DDలు కట్టడమైనది. దీనికి గాను estimated bill approval అయింది. ఇట్టి copy మాకు ఇవ్వడమైనది. కానీ ఇంత వరకు పని పూర్తి కాలేదు కావున మా యొక్క పని తొందరగా అయ్యే విధంగా చూడగలరని విన్నవించుకుంటున్నాము.</p> <p>DD .No .2269 , Dt 29 /11 /2016.</p> <p>(Estimate copy జతపరచడంజరిగింది)</p>	<p>పని పూర్తియైనది. సర్వీస్ రిలీజ్ చేయబడినది.</p> <p>B. Ramulu - సర్వీస్ నెంబర్ -Sc.No.8102 00980,</p> <p>B. Ramulu- సర్వీస్ నెంబర్ -Sc.No.8102 00982,</p> <p>G. Naveen Reddy- సర్వీస్ నెంబర్ -Sc.No.8102 00979,</p> <p>G. Naveen Reddy- సర్వీస్ నెంబర్ -Sc.No.8102 00981</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
10	.K. Vittal Reddy, Amdapur Village, Moinabad Mandal, RR-District Cell.no. 9505028454	
i	<p>నేను వ్యవసాయ (AGL) బోరు కొరకు 23/03/2010 నాడు DD కట్టినాను. కానీ ఇప్పటి వరకు నాకు బోరు దగ్గరికి స్తంబాలు కానీ ఎలాంటి పని జరగలేదు. నేను కరెంటు సంబంధించిన అధికారులకు చాలా సార్లు సంప్రదించగా ప్రయోజనం జరగలేదు. 23/03/2010 నుంచి ఇప్పటి వరకు శిశువత్సరాలు కావస్తుంది. నాకు ఎలాంటి పని జరగలేదు. కావునా ఇప్పటికైన నాపై దయదలచి నాకు న్యాయము చేయగలరని నా యొక్క మనవి.</p> <p>(dd కాపీలు జతపరచడం జరిగింది)</p>	<p>పని పూర్తియైనది. సర్వీస్ (నెంబర్ 8102 00668) రిలీజ్ చేయబడినది</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
11. Y. Balwanth Reddy, Y Balamani, Y. Penta Reddy, Darshan Reddy, Y. Chandra Shekar Reddy Amdapur Village Moinabad RR Dist.		
1	<p>మేము వ్యవసాయం కొరకు కొత్త విద్యుత్ transformer కు 12 నెల 2014 లో ddeu కట్టడమైనది. ఆ తరువాత కొన్ని నెలలకు transformer Approval అయింది అని estimated copy ఇచ్చివెళ్ళారు. కానీ ఇంత వరకు ఆ పని పూర్తి చేయలేదు. ఇట్టి విషయమై ఎవరిని అడిగిన వస్తాది అనడం తప్ప ఇప్పటికీ వచ్చింది లేదు మా బాధలు తీరిందిలేదు. ఈ మధ్యనే మా యొక్క estimated bill number (SDR)-36/2015-16,Dt:17/04/2015 ద్వారా మీ యొక్క siteలో చూడగా మా యొక్క పని పూర్తి అయిపోయిందని వస్తుంది. అంటే ఇందులో ఎక్కడో తప్పు జరిగిందని అనుకుంటున్నాము,జరిగితే ఇట్టి తప్పుపై తగిన ధర్యాప్తు జరిపి వారిపై కఠిన చర్యలు తీసుకుని మాకు జరిగిన విధంగా మారో ఏ రైతులకు జరగకుండా చేసి మా యొక్క పనిని పూర్తి చేయించగలరని మా యొక్క విన్నపము.</p> <p>(Estimate Copy జతపరచడం జరిగినది)</p>	<p>పని పూర్తియైనది. సర్వీస్ రిలీజ్ చేయబడినది.</p> <p>Y Darshan Reddy- సర్వీస్ నెంబర్ -Sc.No.8102 01123</p> <p>Y Chandra Sekhar- సర్వీస్ నెంబర్ -Sc.No.8102 01102</p> <p>Y Balamani- సర్వీస్ నెంబర్ -Sc.No.8102 01124</p> <p>Y Penta Reddy- సర్వీస్ నెంబర్ -Sc.No.8102 01125 &</p> <p>Y Balwanth Reddy- సర్వీస్ నెంబర్ -Sc.No.8102 01122</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee									
12. The Engineer-in-Chief (Irrigation), I&CAD Department,, 2nd Floor, Jalasoudha, Errum Manzil, Hyd-500 082											
1	<p>The Tariff Porposed by the Discoms (TSSPDCL and TSNPDCL) is tow-part tariff, with Seasonal variation in the billing demand while the proposed tariff structure considering demand charges and energy charges is a welcome move, the same is designed in such a manner that the net per unit tariff burden or (ARR) on LI category remains the same. This obviously does not provide any relief to the LI category</p> <p>Cost of supply and Notified Tariff</p> <table border="1" data-bbox="325 565 1373 683"> <thead> <tr> <th></th> <th>Existing Tariff</th> <th>Proposed Tariff</th> </tr> </thead> <tbody> <tr> <td>Demand Charge</td> <td>Nil</td> <td>Rs. 390/KVA/Month</td> </tr> <tr> <td>Energy CHarge</td> <td>Rs.6.40/kVAH</td> <td>Rs. 4.88/kVAH</td> </tr> </tbody> </table>		Existing Tariff	Proposed Tariff	Demand Charge	Nil	Rs. 390/KVA/Month	Energy CHarge	Rs.6.40/kVAH	Rs. 4.88/kVAH	<p>TS Discoms have followed prudent principles of tariff recovery which entails fixing of tariffs which reflects the actual usage. Since substantial portion of the costs incurred by the licensee are fixed in nature, the licencee has proposed demand charge of INR 390/KVA/month which is same for other HT consumers. However in order to avoid any additional burden on irrigation department, TS Discoms have lowered the energy charges to make it a revenue neutral proposition.</p>
	Existing Tariff	Proposed Tariff									
Demand Charge	Nil	Rs. 390/KVA/Month									
Energy CHarge	Rs.6.40/kVAH	Rs. 4.88/kVAH									
2	<p>In addition, the conditions stated for the proposed tariff are following</p> <table border="1" data-bbox="325 873 1373 1206"> <thead> <tr> <th><u>Proposed Tariff Conditions</u></th> </tr> </thead> <tbody> <tr> <td>Demand Charges would be levied on 80% of Contracted maximum Demand (CMD) or Recorded Maximum Demand (RMD) for Operational Months – July to November (5 Months)</td> </tr> <tr> <td>Demand charges would be levied on 30% of Contracted Maximum Demand (CMD) or Recorded Maximum Demand (RMD) for Non- Operational Months – December to June (7 Months)</td> </tr> </tbody> </table>	<u>Proposed Tariff Conditions</u>	Demand Charges would be levied on 80% of Contracted maximum Demand (CMD) or Recorded Maximum Demand (RMD) for Operational Months – July to November (5 Months)	Demand charges would be levied on 30% of Contracted Maximum Demand (CMD) or Recorded Maximum Demand (RMD) for Non- Operational Months – December to June (7 Months)							
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Demand charges would be levied on 30% of Contracted Maximum Demand (CMD) or Recorded Maximum Demand (RMD) for Non- Operational Months – December to June (7 Months)											
3	<p>Analysis shows that the Average Billing Rate (ABR) or effective per unit Tariff considering the proposed two-part tariff works out to be the same as that of the existing single part tariff. Rather, there is a marginal increase in ABR observed in case of the newly proposed tariff, which work out ot Rs. 6.44 per unit compared to 6.40 per</p>	<p>a)The licensee has proposed the similar approach followed by Hon’ble Commision in previous years, wherein an average cost of service was proposed to Lift Irrigation Schemes.</p>									

<p>unit, which is sht eexisting tariff, the detail computation is enclosed as Annexure-3. They key observations and comments on the proposed tariff for LI category are as following.</p> <ol style="list-style-type: none"> a. Despite different cost of supply at different voltage level viz. 11KV, 33 KV and 132 Kv & above, Distribution companies have continued to propose uniform tariff for all voltage levels of supply. tariffs should reflect cost of supply at each voltage level. b. Energy charge during operational season (july to November) should be lower by at least 10% considering the cheaper power available during the said period which coincides with the monsoon season as well as the lower power demand period. Distribution companies can avail cheaper power from power exchanges or through bilateral arrangements during those months at cheaper rates. c. Seasonal Billing Demand is welcome. However, the present tariff proposed such that there no benefit for LI scheme. Theper unit tariff burden of LI category would remain the same. d. The demand charges to be set at such level that it actually lowers that tariff burden on LI category. e. Unfortunately, the proposed two-pat tariff does not provide any incentive to Li schemes to manage their loads. f. During operational Months (july to November), the pumps operate continuously. As a result, load is almost 100% while 	<p>b)The licensee has assumed the commissioning of LI schemes loads as per the annexure enclosed. Further a LF of 65% has been considered.</p> <p>As per the existing practice, discoms have differential tariff structure for seasonal industries. During off-season the billing is on 30% of the contracted demand or recorded demand whichever is higher. TS Discoms have proposed a similar approach for LI schemes during off-seasons.</p> <p>c) & d) The intent of introducing seasonal billing demand is to avoid creating additional financial burden for LI schemes. Hence a revenue neutral proposal has been made.</p> <p>e)The per unit cost of power would decrease through better load management measures.</p> <p>f) TS Discoms have followed the existing norm wherein seasonal consumers are charged 30% of billing demand or recorded demand whichever is higher.</p>
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	<p>during the non-operational months (i.e, from December to June), the Demand charges is proposed to be levied on 30% of Contracted Maximum Demand (CMD) or Recorded Maximum Demand(RMD). However it is highlighted that during the non-operation month, as the categorisation suggest, the LI pumps in thepumping stations will benon-operational and only pumping station auxiliary consumption load would exist which would be of the tune of 10% of the Contract Demand.</p> <p>g. It is important that the conditions are created for LI Schemes to operate in efficient manner. The commission need to set targets close to operation practices. Therefore, the Hon'ble Commission is requested to take into consideration this fact while setting norms for levy of Demand Charges.</p>	
4	Considering the public service/good nature of the LI schemes tariff should not be set higher than voltage level of cost to serve.	TS Discoms have proposed the average cost of service for LI schemes which is in-line with the current tariff order of Hon'ble Commisison.
5	The Commission should recognises the benefits (lower losses at distribution level and higher operating efficiency of large pumps) of setting HT LI Schemes over LT agriculture consumption and should set promotional tariff for LI Schemes.	
6	Seasonal Tariff for Govt. LT Category (HT IV A) to be fixed, considering the seasonal consumption patter of the Govt. LI category and in pursuance of the Provision 62(3) of the Electricity Act, 2003	TS Discoms have followed the existing norm wherein seasonal consumers are charged 30% of billing demand or recorded demand whichever is higher. Seasonal Tariffs are applicable only for seasonal industries but not to any other category.
7	Separate Seasonal Tariff to be set for each voltage level of supply which reflects true voltage-wise cost of supply (CoS) during operational months (july to November) and during non-operational months (December to June)	
8	Voltage-wise Energy charge to be fixed such that Energy Charges during Operational Months – July to November (% months) is	The power purchase costs of TS Discoms depend on generation mix and also on the energy requirement. As per the merit order, during

	<p>lower at least by 10% compared to the Energy charge set for Non-Operational Months –December to June (7 Months) considering the availability of cheaper power during the Operational months which are predominantly monsoon/low load months.</p>	<p>periods of high energy requirement, even high cost stations get dispatched which could lead to incremental increase in power purchase cost. The licensee would like to submit that during the months where LI schemes are operational, energy requirement is on the higher side and proposal for a lower energy charge during these months may not be feasible.</p>
9	<p>Voltage-wise Demand charges to be fixed such that Demand Charges are levied on 10% of Contracted Maximum Demand (CMD) or Recorded maximum Demand (RMD) for Non-Operational Months-December to June (7 Months).</p>	<p>TS Discoms have followed the existing norm wherein seasonal consumers are charged 30% of billing demand or recorded demand whichever is higher</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
13. GMR Vemagiri Power Generation Limited, Corporate office, Airport Building 302, 1st floor, New Shakti Bhawan, New Udaan Bhawan Complex, Near Terminal 3, IGI Airport New Delhi-110037.		
i	<p>Article 2.1 – sale & Purchase of Capacity: From and after Commercial Operation Date of the first Generating unit, subject to the provisions of this Agreement, the Company shall sell, and the DISCOMs shall purchase, for the consideration of the Capacity Charge, all the available Capacity of the Project Limited to Installed Capacity of 370MW</p> <p>Article 1.1.27 Fuel: Means natural Gas only.</p> <p>Article 3.3, Case-I of PPA, “c” is the cost of fuel delivered at metering point is inclusive of cost of Gas and transportation charges, and other taxes as per the invoices given by the GAIL.</p> <p>Article 3.3, Case-Ii: In the event of Purchase of Fuel From Fuel Suppliers other than GAIL, the cost “C” shall be the cost of Fuel delivered at the metering point, inclusive of cost of Fuel and transportation charges, and other taxes as per the invoices (s) given by the Respective Fuel Supplier (S)</p> <p>“Fuel Suppliers” shall mean GAIL or any other fuel supplier with whom a Fuel Supply Agreement has been entered into in accordance with this Agreement.</p> <p>In accordance to the above mentioned PPA provisions, VGPGL has been declaring its plant availability on daily basis with Natural Gas as Fuel. However, TSDISCOMs are not dispatching power from GVPGL in spite of the Availability Declaration as per PPA</p> <p>Background</p> <p>ONGC has started production of Natural gas from K.G. Basin and offered to supply the same to GVPGL and accordingly. Agreement</p>	<p>The GMR Vemagiri Power Generation Limited PPA (370 MW IPP) was amended on 02.05.2007 with fuel means Natural Gas only, for this project gas allocation made by the then Govt. of India from RIL KG-D6 fields under APM (Administered Pricing Mechanism) pricing. Due to depletion of KG-D6 wells, the GMR Project and also other IPP Projects had stopped generating power since 01.03.2013 and the IPPs filed certain cases claiming compensation which are pending in various courts.</p> <p>Post bifurcation of A.P. State, TSDISCOMs were allocated 53.89% share. Recently, M/s GMR Vemagiri has started declaration of their plant availability with ONGC deep water wells, whose gas pricing is based on market dynamics while the PPA is based on APM pricing. Due to this, the cost of generation from M/s GMR Vemagiri Project would be costlier. Hence, both TS & APDISCOMs rejected the plant availability declarations given by M/s GMR Vemagiri.</p>

was signed with GAIL and shared with TS Discoms. It may be noted that GOI, vide notification No. O-22013/27/2012-ONG-D-V (Vol-II) dated 21.03.2016 notified the Marketing including pricing freedom to producers for the Gas to be produced from Discoveries in Deep water, ultra-Deepwater and High Pressure and High Temperature Areas subject to a ceiling price regulated by GoI.

Further, MOPNG vide its letter dated 12.05.2017 to GVPGL, also clarified that no allocation of Gas from the fields of ONGC (S-1 & VA) is warranted in line with GOI notification dated 21.03.2016.

As per PPA, there is no restriction on cost of gas nor source of gas. The PPA stipulates that the cost of Gas is pass through and accordingly to be borne by DISCOMs.

As such, GVPGL is declaring plant availability to TS DISCOMs with Natural Gas supplied by GAIL. The said declaration is in compliance with the terms of existing PPA. Accordingly, invoices are being submitted to TS DISCOMs claiming Fixed charges under the Provisions of PPA.

Suggestion

1. Commission shall take note of the above when ARR is finalized as DISCOMs are frustrating the PPA Terms and creating a financial liability in their books which in due course of time will reflect in the tariff affecting public at large.
2. DISCOMs instead of purchasing power under short term/ bilateral from market, they should consider the availability declarations of power from GVPGL to avoid future fixed cost payment obligation.

S.No.	Summary of Objections / Suggestions	Response of the Licensee														
14. Bimani Venkataiah, Gudla survey village, Biginpalli Mandal, Nagarkurnool District Cell no. 9490091915.																
1	నగర్ కర్నూల్ జిలాలలో కొత్త కనెక్షన్ లు ఎన్ని ఇచ్చారు. ఇంకా ఎన్ని ఇవ్వాలి.	<table border="1"> <thead> <tr> <th data-bbox="1473 334 1596 639">జిల్లా</th> <th data-bbox="1596 334 1776 639">పెండింగ్ లో ఉన్న AGL.కనెక్షన్లు (31-3-2017నాటికి)</th> <th data-bbox="1776 334 2002 639">నమోదైన దరఖాస్తులు (1-4-2017 నుండి 25-1-2018వరకు)</th> <th data-bbox="2002 334 2185 639">విడుదల అయిన సర్వీసులు (1-4-2017 నుండి 25-1-2018వరకు)</th> <th data-bbox="2185 334 2421 639">పెండింగ్ లో ఉన్న AGL.కనెక్షన్లు (25-1-2018నాటికి)</th> </tr> </thead> <tbody> <tr> <td data-bbox="1473 639 1596 797">నాగర్ కర్నూల్</td> <td data-bbox="1596 639 1776 797">4164</td> <td data-bbox="1776 639 2002 797">4413</td> <td data-bbox="2002 639 2185 797">3926</td> <td data-bbox="2185 639 2421 797">4651</td> </tr> </tbody> </table>					జిల్లా	పెండింగ్ లో ఉన్న AGL.కనెక్షన్లు (31-3-2017నాటికి)	నమోదైన దరఖాస్తులు (1-4-2017 నుండి 25-1-2018వరకు)	విడుదల అయిన సర్వీసులు (1-4-2017 నుండి 25-1-2018వరకు)	పెండింగ్ లో ఉన్న AGL.కనెక్షన్లు (25-1-2018నాటికి)	నాగర్ కర్నూల్	4164	4413	3926	4651
జిల్లా	పెండింగ్ లో ఉన్న AGL.కనెక్షన్లు (31-3-2017నాటికి)	నమోదైన దరఖాస్తులు (1-4-2017 నుండి 25-1-2018వరకు)	విడుదల అయిన సర్వీసులు (1-4-2017 నుండి 25-1-2018వరకు)	పెండింగ్ లో ఉన్న AGL.కనెక్షన్లు (25-1-2018నాటికి)												
నాగర్ కర్నూల్	4164	4413	3926	4651												

S.No.	Summary of Objections / Suggestions	Response of the Licensee																											
15.Gurujala Srinivas Reddy, Jakkapur Village, Siddipet Mandal, Siddipet District. Cell.No. 9441247367																													
1	<p>కింది స్థాయి ఉద్యోగస్తులు, హెల్పర్లు, లైన్ మెన్ లు ఒక మండలంలో ఎంతమంది ఉండాలి. ఇప్పుడు ఎంత మంది ఉన్నారు.</p>	<p>సిద్దిపేట మండలంలో కింది స్థాయి ఉద్యోగుల వివరాలు క్రింద తెలపడమైనది</p> <table border="1" data-bbox="1478 324 2252 760"> <thead> <tr> <th data-bbox="1478 324 1650 418">హోదా</th> <th data-bbox="1650 324 1862 418">మంజూరు</th> <th data-bbox="1862 324 2075 418">నియమించినవి</th> <th data-bbox="2075 324 2252 418">ఖాళీలు</th> </tr> </thead> <tbody> <tr> <td data-bbox="1478 418 1650 488">FM</td> <td data-bbox="1650 418 1862 488">3</td> <td data-bbox="1862 418 2075 488">3</td> <td data-bbox="2075 418 2252 488">0</td> </tr> <tr> <td data-bbox="1478 488 1650 558">SLI</td> <td data-bbox="1650 488 1862 558">1</td> <td data-bbox="1862 488 2075 558">1</td> <td data-bbox="2075 488 2252 558">0</td> </tr> <tr> <td data-bbox="1478 558 1650 628">LI</td> <td data-bbox="1650 558 1862 628">6</td> <td data-bbox="1862 558 2075 628">6</td> <td data-bbox="2075 558 2252 628">0</td> </tr> <tr> <td data-bbox="1478 628 1650 698">LM</td> <td data-bbox="1650 628 1862 698">17</td> <td data-bbox="1862 628 2075 698">17</td> <td data-bbox="2075 628 2252 698">0</td> </tr> <tr> <td data-bbox="1478 698 1650 760">ALM/JLM</td> <td data-bbox="1650 698 1862 760">25</td> <td data-bbox="1862 698 2075 760">4</td> <td data-bbox="2075 698 2252 760">21</td> </tr> </tbody> </table>				హోదా	మంజూరు	నియమించినవి	ఖాళీలు	FM	3	3	0	SLI	1	1	0	LI	6	6	0	LM	17	17	0	ALM/JLM	25	4	21
హోదా	మంజూరు	నియమించినవి	ఖాళీలు																										
FM	3	3	0																										
SLI	1	1	0																										
LI	6	6	0																										
LM	17	17	0																										
ALM/JLM	25	4	21																										

S.No.	Summary of Objections / Suggestions	Response of the Licensee																											
16. A.Anjaneyulu, Mallayapalli village, Dubbaka Mandal, Siddipet District Cell No. 9032695545																													
1	<p>దుబ్బాక మండలంలో హెల్పర్లు, లైన్ మెన్ లు ఎంతమంది ఉండాలి. ఎంత మంది ఉన్నారు తెలియజేయగలరు.</p>	<p>దుబ్బాక మండలంలో కింది స్థాయి ఉద్యోగుల వివరాలు క్రింద తెలపడమైనది</p> <table border="1" data-bbox="1400 326 2134 760"> <thead> <tr> <th data-bbox="1400 326 1577 418">హోదా</th> <th data-bbox="1577 326 1739 418">మంజూరు</th> <th data-bbox="1739 326 1954 418">నియమించినవి</th> <th data-bbox="1954 326 2134 418">ఖాళీలు</th> </tr> </thead> <tbody> <tr> <td data-bbox="1400 418 1577 488">FM</td> <td data-bbox="1577 418 1739 488">-</td> <td data-bbox="1739 418 1954 488">-</td> <td data-bbox="1954 418 2134 488">-</td> </tr> <tr> <td data-bbox="1400 488 1577 558">SLI</td> <td data-bbox="1577 488 1739 558">-</td> <td data-bbox="1739 488 1954 558">-</td> <td data-bbox="1954 488 2134 558">-</td> </tr> <tr> <td data-bbox="1400 558 1577 628">LI</td> <td data-bbox="1577 558 1739 628">2</td> <td data-bbox="1739 558 1954 628">2</td> <td data-bbox="1954 558 2134 628">0</td> </tr> <tr> <td data-bbox="1400 628 1577 698">LM</td> <td data-bbox="1577 628 1739 698">4</td> <td data-bbox="1739 628 1954 698">4</td> <td data-bbox="1954 628 2134 698">0</td> </tr> <tr> <td data-bbox="1400 698 1577 760">ALM/JLM</td> <td data-bbox="1577 698 1739 760">12</td> <td data-bbox="1739 698 1954 760">5</td> <td data-bbox="1954 698 2134 760">7</td> </tr> </tbody> </table>				హోదా	మంజూరు	నియమించినవి	ఖాళీలు	FM	-	-	-	SLI	-	-	-	LI	2	2	0	LM	4	4	0	ALM/JLM	12	5	7
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S.No.	Summary of Objections / Suggestions	Response of the Licensee
17.Laxmi Kanth Subash Road, narayanpet mandal, mahaboob nagar district cell.no. 9440070142		
1	విద్యుత్ మరణాలు ఎన్ని జరిగాయి. ఎన్నింటికి తక్షణ సహాయం అందించారు. మిగతావి ఎందుకు ఇవ్వలేదు కారణాలు తెలుపగలరు.	ఈ ప్రస్తుత FY సంవత్సరానికి విద్యుత్ మరణాలు 256 జరిగాయి. అందులో తక్షణ సహాయం కింద 124 ఇవ్వడం జరిగింది. మిగతా వాటికి సరైన పత్రాలు పంపని కారణంగా ఇవ్వడం జరగలేదు.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
18.Manik Reddy, Naragudem Village, pulapalli, Nawabpet, Vikarabad District 501101.		
1	DTR లు దొంగతనానికి గురైన చో ఎన్ని రోజులో కొత్తది ఏర్పాటు చేస్తారు. వికారాబాద్ జిల్లాలో ని నవాపేట మండలములోని దాన్ని దొంగలించారు ఎన్ని రోజులో బిగించారు కొత్తవి. ఇదే మండలంలో ఎక్కువ జరుగుతున్నాయి. దీనిపై చర్యలు ఏమి తీసుకున్నారు.	ప్రత్యామ్నాయ విద్యుత్ శక్తిని ఇచ్చి, FIR వచ్చిన తర్వాత 2 రోజులలో కొత్తవి ఏర్పాటు చేస్తారు.

S.No.	Summary of Objections / Suggestions	Response of the Licensee					
19.Venkoba, Subash Road, Narayanpet Mandal, Mahabubnagar district, Cell No. 7893458957							
1	కొత్త కనెక్షన్ లు పాత మహబూబ్ నగర్ జిల్లాలో ఎన్ని ఇచ్చారు. ఇంకా ఎన్ని ఇవ్వాలి తెలుపగలరు. నారాయణ పేట డివిజన్ లో మండలవారీగా ఇవ్వగలరు.	క్ర. సం.	జిల్లా	పెండింగ్ లో ఉన్న AGL కనెక్షన్లు (31-3-2017నాటికి)	నమోదైన దరఖాస్తులు (1-4-2017 నుండి 25-1-2018వరకు)	విడుదల అయిన సర్వీసులు (1-4-2017 నుండి 25-1-2018వరకు)	పెండింగ్ లో ఉన్న AGL కనెక్షన్లు (25-1-2018 నాటికి)
		1	మహబూబ్ నగర్	2744	3656	2703	3697
		నారాయణపేట మండల వారీగా					
		1	దంవాడ	125	165	46	244
		2	నారాయణపేట	81	141	71	151
		3	దామరగిద్ద	214	163	191	186
		4	ఉట్కూర్	95	82	81	96
		5	మక్తల్	121	361	172	310
		6	మగనూర్	214	390	298	306
		7	గందీద్	148	240	118	270
		8	కోసిగి	161	265	116	310
		9	మద్దూర్	121	294	142	273

S.No.	Summary of Objections / Suggestions	Response of the Licensee
20.B. Malla Reddy, Tuniki Bollaram Village, Mulugu Mandal, Siddipet District. Cell.No. 9640530678		
1	<p>CGRF కు సమస్యలు ఇచ్చిన తర్వాత sop ప్రకారం పని కానీ ఎడల మీరు తీసుకున్న చర్యల గురించి తెలుపగలరు. తీర్పు ఇచ్చిన తర్వాత పని కానీ చో (సం అయినా కూడా) మేము ఏమి చేయాలి. మీరు ఏమిచేస్తారు తెలపగలరు..</p>	<p>CGRF యొక్క ఆదేశాలు డిస్కోమ్ వారు అమలు చేయడం జరుగుతుంది.</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee																														
21.Srikanth Reddy, Doulapur Village, Papanna peta Mandal, Medak District 502331, Cell.No. 9948090218																																
i	<p>DTR లు కాలి ఫోన్ నంబరు 18004253600 నెంబర్ కి ఫోన్ చేసి సమాచారం ఇస్తే మీరు 48 గంటలో ఏమి చేస్తారా. మా మండలంలో చేస్తున్నారా . ఈ సం ఎన్ని DTR మీరు చేసారు తెలుపగలరు.</p>	<p>మీరు విద్యుత్ టోల్ ఫ్రీ నంబరు 18004253600 నకు ఫోన్ చేసి విద్యుత్ సమస్యను తెలిపితే , 48 గంటలలోనే సమస్యకు పరిష్కారం చూపుతారు. పాపన్నపేట మండలంలో ఈ సర్వీసు సౌలభ్యం కలదు.</p> <p>May'17 నుండి Jan'18 వరకు నమోదైన ఫిర్యాదులు సర్కిల్ వారీగా కింద తెలుపడమైనది.</p> <table border="1" data-bbox="1507 573 2389 1192"> <thead> <tr> <th>క్ర.సం.</th> <th>జిల్లా</th> <th>ఫిర్యాదుల సంఖ్య</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>మెదక్</td> <td>9</td> </tr> <tr> <td>2</td> <td>మహబూబ్ నగర్</td> <td>24</td> </tr> <tr> <td>3</td> <td>నల్గొండ</td> <td>10</td> </tr> <tr> <td>4</td> <td>రంగారెడ్డి</td> <td>61</td> </tr> <tr> <td>5</td> <td>వనపర్తి</td> <td>1</td> </tr> <tr> <td>6</td> <td>నాగర్ కర్నూల్</td> <td>20</td> </tr> <tr> <td>7</td> <td>సిద్దిపేట్</td> <td>5</td> </tr> <tr> <td>8</td> <td>వికారాబాద్</td> <td>13</td> </tr> <tr> <td colspan="2">మొత్తం</td> <td>143</td> </tr> </tbody> </table> <p>నమోదైన అన్ని ఫిర్యాదులు పరిష్కరించడమైనది.</p>	క్ర.సం.	జిల్లా	ఫిర్యాదుల సంఖ్య	1	మెదక్	9	2	మహబూబ్ నగర్	24	3	నల్గొండ	10	4	రంగారెడ్డి	61	5	వనపర్తి	1	6	నాగర్ కర్నూల్	20	7	సిద్దిపేట్	5	8	వికారాబాద్	13	మొత్తం		143
క్ర.సం.	జిల్లా	ఫిర్యాదుల సంఖ్య																														
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మొత్తం		143																														

S.No.	Summary of Objections / Suggestions	Response of the Licensee																														
22.PanyalaVenkat Reddy, 1-10-1/2/39/95, Sri Chakra Puram, Kapra, Kushaiguida, Hyderabad -500 062 cell.No. 9491594055																																
i	18004253600 ఈ ఫోన్ ద్వారా ఎన్ని సమస్యలు వచ్చినాయి ఎన్ని సమస్యలు పరిష్కారం అయినాయి. పరిష్కారం కానీ వాటి పైన మీరు ఏమి చర్యలు తీసుకున్నారు .	<p>May'17 నుండి Jan'18 వరకు నమోదైన ఫిర్యాదులు సర్కిల్ వారీగా కింద తెలుపడమైనది.</p> <table border="1" data-bbox="1507 391 2389 1011"> <thead> <tr> <th>క్ర.సం.</th> <th>జిల్లా</th> <th>ఫిర్యాదుల సంఖ్య</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>మెదక్</td> <td>9</td> </tr> <tr> <td>2</td> <td>మహబూబ్ నగర్</td> <td>24</td> </tr> <tr> <td>3</td> <td>నల్గొండ</td> <td>10</td> </tr> <tr> <td>4</td> <td>రంగారెడ్డి</td> <td>61</td> </tr> <tr> <td>5</td> <td>వనపర్తి</td> <td>1</td> </tr> <tr> <td>6</td> <td>నాగర్ కర్నూల్</td> <td>20</td> </tr> <tr> <td>7</td> <td>సిద్దిపేట్</td> <td>5</td> </tr> <tr> <td>8</td> <td>వికారాబాద్</td> <td>13</td> </tr> <tr> <td colspan="2">మొత్తం</td> <td>143</td> </tr> </tbody> </table> <p>నమోదైన అన్ని ఫిర్యాదులు పరిష్కరించడమైనది.</p>	క్ర.సం.	జిల్లా	ఫిర్యాదుల సంఖ్య	1	మెదక్	9	2	మహబూబ్ నగర్	24	3	నల్గొండ	10	4	రంగారెడ్డి	61	5	వనపర్తి	1	6	నాగర్ కర్నూల్	20	7	సిద్దిపేట్	5	8	వికారాబాద్	13	మొత్తం		143
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ii	CGRF ద్వారా ఎన్ని సమస్యలు వచ్చినాయి ఎన్ని తీర్పు ఇచ్చినారు. తీర్పు ఇచ్చిన తర్వాత పని కానీ వాటి మీద ఏమి చర్యలు తీసుకున్నారు తెలుపగలరు.	<p>2017-18 సం. లో CGRF లోనమోదైన మరియు పరిష్కరింపబడిన ఫిర్యాదులు క్రింద జాబితా చేయబడింది.</p> <p style="text-align: center;"><u>CGRF-I యందునమోదైన మరియు పరిష్కరింపబడిన ఫిర్యాదులు</u> (01.04.2017 నుండి 25.01.2018 వరకు)</p> <table border="1" data-bbox="1419 1287 2421 1403"> <thead> <tr> <th>సర్కిల్</th> <th>నమోదైన ఫిర్యాదులు (01.04.2017 నుండి</th> <th>పరిష్కరింపబడినవి</th> <th>మిగిలినవి</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	సర్కిల్	నమోదైన ఫిర్యాదులు (01.04.2017 నుండి	పరిష్కరింపబడినవి	మిగిలినవి																										
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		4	31.12.2017 నాటికిమిగిలినఫిర్యాదులు	112
		5	2017-18 సం. లోజరిగిన CGRF సమావేశాలు (డిసెంబర్ 2017 వరకు)	92
		6	2017-18 సం. లో పరిహారం చెల్లించిన ఫిర్యాదులు (డిసెంబర్ 2017 వరకు)	-
		7	2017-18 సం. లో చెల్లించిన పరిహార మొత్తం(డిసెంబర్ 2017 వరకు)	-

S.No.	Summary of Objections / Suggestions	Response of the Licensee
23.HanmanthRao, Maadaram Village, Shamirpet Mandal, Medchal Cell.No. 9246885864		
i	కొత్త కనెక్షన్ వ్యవసాయం కొరకు ఇంకా రైతుల ద్వారానే సామాన్లు కొనిపిస్తున్నారు. ఎన్ని సామాన్లు మీరు ఇస్తారు. మేము ఏమి కొనుక్కోవాలి. అందరికీ తెలిసే విధంగా కర పత్రాల ద్వారా ప్రచారం చేస్తారా. ఏమి చేస్తారు తెలుపగలరు.	వ్యవసాయ కనెక్షన్ కొరకు రైతుల ద్వారా కేవలం ORC(Out Right Contribution) మొత్తాన్ని కట్టించుకోవడం జరుగుతున్నది మరియు సంబంధిత మెటీరియల్ డిపార్టుమెంట్ ద్వారానే సరఫరా చేయడం జరుగుచున్నది.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
24.D. Ramu, H.No. 2-1-174,175, Nallakunta Hyderabad, Cell.No. 9441901736.		
i	<p>18004253600 ఫోన్ చేసినప్పుడు కంప్లైంట్ నెంబర్ ఇస్తారు. పని కానిచో సమయము పూర్తి అయినా తర్వాత మళ్ళీ అడగడం కొరకు నెంబర్ ఇవ్వడం లేదు.</p> <p>DTR లు ఎన్ని కాలిపోయినవి. 18004253600 ఫోన్ ద్వారా వచ్చినవి, ఎన్ని DTR లు 48 గంటల లో పూర్తి చేసినారు. పూర్తి చేయించని వాటి పై ఏమి చర్యలు తీసుకున్నారు SOP ప్రకారం.</p> <p>విద్యుత్ మరణాలను తగ్గించడం కొరకు తగిన విధంగా చర్యలు తీసుకుంటాం అని కమిషన్ మండు గతంలో చెప్పినారు. కానీ మీరు ఇచ్చిన నివేదికలో మరణాల శాతం పెరిగింది. కారణం తెలుపగలరు.</p> <p>DTR లు దొంగలించినప్పుడు తిరిగి ఎన్ని రోజులలో కొత్తవి ఏర్పాటు చేస్తున్నారు.SOP ప్రకారం జరుగుతుందా? జరగని చో చర్యలు ఏమి తీసుకున్నారు? వికారాబాద్ జిల్లాలో నవాబుపేట మండలం లో ఎన్ని DTR లు దొంగలించబడినవి. SOp ప్రకారం ఎన్ని అందించారు కానీ ఎడల ఏమి చర్యలు తీసుకున్నారు.</p>	<p>18004253600 ఫోన్ ద్వారా 64 DTR ల గురించి కంప్లైంట్లు వచ్చినవి. 64 DTR లు 48 గంటలలో మార్చినారు.</p> <p>FIR కాపీ వచ్చిన వెంటనే రెండు రోజుల్లో కొత్త DTR లు పెట్టున్నాము. ఇప్పటి వరకు 2017 - 2018 సంవత్సరంలో 23 DTR లు నవాబుపేట మండలము లో పెట్టినాము. పోలీసుల సలహా మేరకు ట్రాన్స్ఫర్మర్ మరియు స్ట్రక్చర్ వెల్డింగ్ చేయిస్తున్నాము.</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
25.	Kancharla Soma Reddy, Merlagadda Tanda village, peruru, anumala Mandal, Nalgonda District Cell.No. 9492863465	
i	18004253600 ఇది 24 గంటలు పనిచేస్తుందా, కంప్లైంట్ నెంబర్ ఇవ్వడంలేదు. 48గంటలు పూర్తి అయిన తర్వాత పని పూర్తి కాకపోతే మేము ఏమి చేయాలి తెలుపగలరు.	విద్యుత్ టోల్ ఫ్రీ నంబరు 18004253600 24 గంటలు పనిచేస్తుంది. , 48 గంటలలోనే సమస్యకు పని కానప్పుడుసంబంధిత DE గారికి మీ సమస్యను తెలియచేయగలరు లేనిచో CGRF కు ఫిర్యాదు చేసికొన వచ్చు.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
26. Telangana Solar Open Access Developers Association, 8-3-224/4/A, pt no. 11&12, Sy.no. 01, room No. 12, Madhura Nagar, Yousufguda, Hyderabad-500 038		
1	<p>The Honorable commission (TSERC) Vides its order dated: 22-12-2017 in O.P.No. 23 of 2016, passed an amendment order to the retail supply tariff order for the year 2017-18 duly exempting solar projects from levy of CSS in line with the Combined AP solar policy of 2012 and Telangana Government Solar Policy of 2015.</p> <p>Now in line with these government policies it is requested to Honorable Commission (TSERC) for exempting solar projects from levy of CSS and Additional Surcharge (ASS) in its retails supply tariff order for the year 2018-19.</p>	<p>As the Telangana Solar power policy will be in force for five years from 01.06.2015, therefore, the licensee requests the Hon'ble Commission to continue the exemption of Cross Subsidy Surcharge for the open access consumers within state buying solar power from solar power developers for the FY2018-19 as stipulated in Solar Power Policy in accordance to the amendment to Cross Subsidy Surcharge order for FY 2017-18 dt.22.12.2017.</p> <p>As the exemption of Additional surcharge is not stipulated in the AP Solar Policy of 2012 and Telangana Government Solar Policy of 2015, additional surcharge shall be levied on Open access consumers availing supply from solar power developers also in order that the DISCOMs shall not forego its legitimate revenue to recover its costs</p>
2	<p>With respect to APERC order APERC/Secy/25/2013 dated 04-05-2013 we request Honorable Commission (TSERC) to give relief to solar developers/generator/consumers by exempting from the levy of TOD charges by including it in the tariff order</p> <p>The exemptions requested above be allowed to the solar projects set up under A.P.. Solar policy, 2012 & Telangana Solar Policy, 2015.</p>	<p>The levy of ToD charges is to maintain Grid Stability and to contain the Peak loads. Hence it shall be continued.</p>
3	<p>With respect to APERC order APERC/Secy/25/2013 dated 04-05-2013 we request Honorable Commission (TSERC) to give relief to solar developers/generator/consumers by exempting from the levy of TOD charges by including it in the tariff order</p> <p>The exemptions requested above be allowed to the solar projects set up under A.P.. Solar policy, 2012 & Telangana Solar Policy, 2015.</p>	<p>The levy of Cross Subsidy Surcharge and Additonal Surcharge is as per the mandate of the Electricity Act, 2003.</p> <p>Any relief in Cross Subsidy Surcharge and Additional Surcharge will lead to underrecovery of costs to the DISCOMs and have impact on the financials of the DISCOMs</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
27. Arhyama Solar Power Ltd, Room No. 201, & 202, 8-3-224/4/A/11 & 12, F/4, Yousuf Guda main road, Madhuranagar Hyderabad-38		
1	<p>The Honorable commission (TSERC) Vides its order dated: 22-12-2017 in O.P.No. 23 of 2016, passed an amendment order to the retail supply tariff order for the year 2017-18 duly exempting solar projects from levy of CSS in line with the Combined AP solar policy of 2012 and Telangana Government Solar Policy of 2015.</p> <p>Now in line with these government policies it is requested to Honorable Commission (TSERC) for exempting solar projects from levy of CSS and Additional Surcharge (ASS) in its retails supply tariff order for the year 2018-19.</p>	<p>As the Telangana Solar power policy will be in force for five years from 01.06.2015, therefore, the licensee requests the Hon'ble Commission to continue the exemption of Cross Subsidy Surcharge for the open access consumers within state buying solar power from solar power developers for the FY2018-19 as stipulated in Solar Power Policy in accordance to the amendment to Cross Subsidy Surcharge order for FY 2017-18 dt.22.12.2017.</p> <p>As the exemption of Additional surcharge is not stipulated in the AP Solar Policy of 2012 and Telangana Government Solar Policy of 2015, additional surcharge shall be levied on Open access consumers availing supply from solar power developers also in order that the DISCOMs shall not forego its legitimate revenue to recover its costs</p>
2	<p>With respect to APERC order APERC/Secy/25/2013 dated 04-05-2013 we request Honorable Commission (TSERC) to give relief to solar developers/generator/consumers by exempting from the levy of TOD charges by including it in the tariff order</p> <p>The exemptions requested above be allowed to the solar projects set up under A.P.. Solar policy, 2012 & Telangana Solar Policy, 2015.</p>	<p>The levy of ToD charges is to maintain Grid Stability and to contain the Peak loads. Hence it shall be continued.</p>
3	<p>With respect to APERC order APERC/Secy/25/2013 dated 04-05-2013 we request Honorable Commission (TSERC) to give relief to solar developers/generator/consumers by exempting from the levy of TOD charges by including it in the tariff order</p> <p>The exemptions requested above be allowed to the solar projects set up under A.P.. Solar policy, 2012 & Telangana Solar Policy, 2015.</p>	<p>The levy of Cross Subsidy Surcharge and Additonal Surcharge is as per the mandate of the Electricity Act, 2003.</p> <p>Any relief in Cross Subsidy Surcharge and Additional Surcharge will lead to underrecovery of costs to the DISCOMs and have impact on the financials of the DISCOMs</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee												
28.M. Kodanda Reddy, Chairman, Kisan Keth Mazdur Congress, Gandhi Bhavan, Hyderabad- 500 001														
1	According to ARRs of TSDISCOMs during the FY 2018-19 electricity requirement in Telangana would be 64, 291 MU. An examination of UDAY Document signed by both the DISCOMs and GoTS with GoI shows that during this FY electricity requirement would be 61, 588 MU. ARR estimate of electricity requirement during FY 2018-19 appears to be higher by 2,700 MU entailing an additional power purchase expenditure of Rs. 1,171 Crore (at average power cost of Rs. 4.34/U). It is important to review electricity requirement estimate arrived at by the TSDISCOMs in their ARRs	At the time of entering into UDAY agreement, 24 hrs power supply to agriculture sector is not considered and also there are lot of new schemes like mission Bhageeratha, new lift irrigation schemes have come up after UDAY agreement which are considered in sales forecast for FY 2018-19 in this filings. Hence there is an increase in power procurement for FY 2018-19 in ARR filings 2018-19 when compared to that of in UDAY document. The expected PP cost for procuring 42193 MU is estimated at Rs 27,903 crs at an average PP cost of Rs 4.37 per unit for TSSPDCL.												
2	<p>TSDISCOMs in their ARR filings explained that their sales projections/consumption estimates of electricity are based on Trend Method and End User Method. An analysis of electricity consumption figures for the FY 2017-18 shows that this method might be giving rise to over estimated consumption figures. In the present ARR filings the figures for consumption estimates for FY 2017-18 are available at two places – Energy Balance (2.1.1 – p.10 of NPDCL and p.11 of SPDCL) and in the Section on Sales Forecast (3.2.4 – p.24 of NPDCL and p.42 of SPDCL). Figures in Sales Forecast are based on Trend Method and End User Method. Details are given in the following table:</p> <table border="1" data-bbox="325 1057 1163 1248"> <thead> <tr> <th data-bbox="325 1057 548 1133">DISCOM</th> <th data-bbox="548 1057 849 1133">Energy Balance (MU)</th> <th data-bbox="849 1057 1163 1133">Sales Forecast (MU)</th> </tr> </thead> <tbody> <tr> <td data-bbox="325 1133 548 1170">TSNPDCL</td> <td data-bbox="548 1133 849 1170">15,830</td> <td data-bbox="849 1133 1163 1170">16,336</td> </tr> <tr> <td data-bbox="325 1170 548 1208">TSSPDCL</td> <td data-bbox="548 1170 849 1208">36,811</td> <td data-bbox="849 1170 1163 1208">38,664</td> </tr> <tr> <td data-bbox="325 1208 548 1248">Total</td> <td data-bbox="548 1208 849 1248">52,641</td> <td data-bbox="849 1208 1163 1248">55,000</td> </tr> </tbody> </table>	DISCOM	Energy Balance (MU)	Sales Forecast (MU)	TSNPDCL	15,830	16,336	TSSPDCL	36,811	38,664	Total	52,641	55,000	The energy requirement of 36811 MU shown at page 11 of TSSPDCL ARR filings is the energy requirement at Discom level in which the Transmission losses and PGCIL losses were not included. Whereas, the energy requirement shown at page 42 of TSSPDCL ARR filings (38664 MU) is inclusive of transmission and PGCIL losses.
DISCOM	Energy Balance (MU)	Sales Forecast (MU)												
TSNPDCL	15,830	16,336												
TSSPDCL	36,811	38,664												
Total	52,641	55,000												
3	From the above table it is clear that power consumption estimates for FY 2017-18 based Trend Method and End User Method are													

	higher by 2,359 MU compared to the figures provided in the Energy balance Section of ARR of both the DISCOMs. This shows that the Trend Method and End User Method is leading to over estimation of electricity consumption. From this one may infer that the electricity consumption estimate for the FY 2018-19 is similarly over estimated. The same need to be revised.																																			
4	<p>Power consumption in the past: (MU)</p> <table border="1"> <thead> <tr> <th rowspan="2">DISCOM</th> <th colspan="3">2016-17</th> <th colspan="3">2017-18</th> </tr> <tr> <th>ARR</th> <th>APERC</th> <th>Actual</th> <th>ARR</th> <th>APERC</th> <th>Present Estimate</th> </tr> </thead> <tbody> <tr> <td>NPDCL</td> <td>15,592</td> <td>14,379</td> <td>14,674</td> <td>16,323</td> <td>15,587</td> <td>15,830</td> </tr> <tr> <td>SPDCL</td> <td>39,292</td> <td>37,685</td> <td>34,804</td> <td>38,433</td> <td>36,658</td> <td>36,811</td> </tr> <tr> <td>Total</td> <td>54,884</td> <td>52,063</td> <td>49,478</td> <td>54,756</td> <td>52,235</td> <td>52,641</td> </tr> </tbody> </table> <p>Past experiences show that actual power procurement by the TSDISCOMs was much less than their ARR proposals. During 2016-17 while TSDISCOMs as part of ARR proposals projected energy requirement of 54,884 MU the actual procurement was only 49,478 MU. Similarly, during 2017-18 while DISCOMs as part of ARR proposals projected energy requirement of 54,756 MU estimated procurement will be 52,641 MU. During 2016-17 the actual power procurement was also less than the quantum approved by the Commission. During 2017-18 estimated procurement is slightly higher than the quantum approved by the Commission. This is largely due to higher expected consumption in the agriculture sector, while metered sales are expected to be lower than the quantum approved by the Commission.</p>	DISCOM	2016-17			2017-18			ARR	APERC	Actual	ARR	APERC	Present Estimate	NPDCL	15,592	14,379	14,674	16,323	15,587	15,830	SPDCL	39,292	37,685	34,804	38,433	36,658	36,811	Total	54,884	52,063	49,478	54,756	52,235	52,641	The total sales recorded in 2016-17 in TSSPDCL are 30844 MU against the approved sales of 32759 MU by TSERC in the Tariff order 2016-17. The reduction in sales is mainly due to increase in open access sales which are 2159 MU
DISCOM	2016-17			2017-18																																
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5	TSSPDCL projected 10.32% increase in total electricity consumption during 2018-19 while during 2017-18 it increased by 7.07% only. In the case of HT consumers TSSPDCL projected 27.66% increase in electricity consumption during 2018-19 while	The Licensee has projected sales of 33,026 MU for FY 2017-18 with a growth rate of 7.07% over 2016-17. This is mainly due increase in agricultural sales due to providing 24 hrs power supply to agriculture sector from January 1 st , 2018 and upcoming HMR Stations of 20MVA																																		

	<p>during the previous year its consumption increased by 5.19% only. Even without new lift irrigation schemes, Mission Bhagiratha and 24 hour power supply to agriculture electricity consumption growth rate during ensuing year (8.38%) will be higher than the current year (6.89%) Similarly, TSNPDCL projected 36.25% increase in total electricity consumption during 2018-19 while during 2017-18 it increased by 9.65% only. In the case of HT consumers TSNPDCL projected 105.51% increase in electricity consumption during 2018-19 while during the previous year its consumption increased by 14.57% only. This trend points to the need to exercise caution while adopting DISCOM's estimate of power consumption and procurement during the ensuing year i.e., 2018-19. Overestimation of HT sales will have adverse impact on the finances of DISCOMs. Lower than projected consumption by high tariff consumers like HT services will lead to under realization of revenue and consequent increase in deficit of DISCOMs</p>	<p>capacity at Uppal, Miyapur & MGBS in FY17-18H2. For the FY 2018-19, the licensee has projected a sales volume of 36,434 MU for FY 2018-19 with a growth rate of 10.32% over 2017-18. The growth rate is increased mainly due to anticipation of</p> <ul style="list-style-type: none"> i) some major industrial loads like, IKEA with a CMD of 3.2 MVA, Pharma City a CMD of 50 MVA and Amazon data centres a CMD of 50 MVA, ii) 11 MVA load of commercial loads of Hyderabad Metro services, iii) 627 MVA load of various lift irrigations schemes (parts of Kaleshwaram L.I, Regonda-Thotapally Reservoir, Udaya samudram L.I), iv) 42 MW of Mission Bhageeratha, and v) 52 MVA of new Traction loads and 20 MVA of Hyderabad Metro rail . The overall growth rate of total sales projected for FY 2018-19 over 2017-18 without agriculture, lift irrigation and Mission bhageeratha 8.38%.
<p>6</p>	<p>ARR filings of both the DISCOMs show that electricity consumption by lift irrigation schemes is going to increase substantially. Under TSSPDCL electricity consumption by lift irrigation schemes is going to increase by 125% and in the case of TSNPDCL it is going to increase by 575% during ensuing year. How many of the listed LIS will in fact become operational need to be examined. Some of these schemes are still under construction. Foundation stone for Tummilla scheme in Gadwal-Jogulamba district was laid only during second week of January. Besides this, electricity consumption by these LIS will be restricted to a short period and will have different consumption dynamics. These aspects need to be taken in to account while assessing electricity consumption by this category.</p>	<p>The projected requirement given by the irrigation department have been reduced by considering the physical progress of the schemes and sales were projected with 120 days of operation in a year with 16 hours per day of operation. Further the likely water inflows has been factored in and period of operation has been considered accordingly from mid-July to mid-october or August to October. The mentioned Tummilla scheme has not been considered in TSSPDCL sales projection.</p>
<p>7</p>	<p>Agriculture sector is going to account for 26% of the electricity to be supplied in Telangana during the FY 2018-19. Both the</p>	<ul style="list-style-type: none"> ➤ The circle wise month wise consumption is projected for the year 2018-19 by applying the average growth of 33.36% to the circle wise month

	<p>DISCOMs have claimed that they are following the ISI methodology stipulated by the Commission in estimating electricity consumption in the agriculture sector. Apart from this assertion no other details about this estimation is made part of the ARR filing. 24 hour supply of electricity is going to present another problem in this regard. TSSPDCL in its filings stated that during the ensuing year electricity consumption in agriculture sector will grow by 2.83% while during the current year (2017-18) it increased by 8.31%. Given 24 hour power supply throughout the year growth rate in consumption would have been higher during ensuing year compared to the current year. TSSPDCL also stated, "Significant growth rate of 34.52% is observed in FY 2016-17 over FY 2015-16 and 49.12% in H1 of FY 2017-18 over H1 of 2016-17." All these numbers appear unconvincing.</p>	<p>wise average consumption in the year 2016-17 and multiplying the same with the circle wise projected DTR capacity for 2018-19.</p> <ul style="list-style-type: none"> ➤ The total agriculture consumption under TSSPDCL for the year 2018-19 is projected as 12,285 MUs based on the above methodology. <p>However, the total projected consumption for Agriculture is reduced because of the following reasons:</p> <ul style="list-style-type: none"> ➤ The entire estimated total DTR capacity for H2 2017-18 and 2018-19 is considered for projecting the consumption. However, in reality, the new connections will be released in a phased manner over months. ➤ An Additional sales of 941.92 MUs for LI Schemes is projected for the year 2018-19 under TSSPDCL. This will reduce burden on Agriculture pump sets to an extent. ➤ Telangana State Government is campaigning for removal of auto starters for the pump sets. This will avoid wastage of water and electricity. ➤ With the implementation of 24 hrs power supply to Agriculture, the farmers can pump water at any time of the day at their comfort. Because of this, it is expected that they will judiciously pump water only as per their requirement resulting in lower consumption of electricity. 																								
<p>8</p>	<p>Similarly, TSNPDCL stated that during FY 2017-18 electricity consumption by the agriculture pump sets will increase by 10.35% and the same will be 14.57% during FY 2018-19. In the ARR for the FY 2017-18 both the DISCOMs stated that electricity consumption by the agriculture pump sets would be increasing by 6.50%. Present estimates by them shows that this increase will be much higher</p>																									
<p>9</p>	<p>Under the given ISI methodology DISCOMs are expected to provide Circle wise information related to number of agriculture services, their connected load and annual electricity consumption. We request the Commission to direct the DISCOMs to provide this information.</p>																									
<p>The circle wise no. of consumers, connected capacity are given below: 2017-18</p>		<table border="1"> <thead> <tr> <th>Circle</th> <th>No. of Agl Services</th> <th>Connected DTR Capacity (KVA)</th> <th>Projected Annual Consumption (MU)</th> </tr> </thead> <tbody> <tr> <td>Nalgonda</td> <td>376,685</td> <td>2504916</td> <td>2955.08</td> </tr> <tr> <td>Mahbubnagar</td> <td>253,186</td> <td>2231769</td> <td>1693.60</td> </tr> <tr> <td>Medak</td> <td>127,677</td> <td>1010043</td> <td>1315.72</td> </tr> <tr> <td>Siddipet</td> <td>163,046</td> <td>1198874</td> <td>1626.26</td> </tr> <tr> <td>RR (N)</td> <td>123,403</td> <td>86557</td> <td>110.48</td> </tr> </tbody> </table>	Circle	No. of Agl Services	Connected DTR Capacity (KVA)	Projected Annual Consumption (MU)	Nalgonda	376,685	2504916	2955.08	Mahbubnagar	253,186	2231769	1693.60	Medak	127,677	1010043	1315.72	Siddipet	163,046	1198874	1626.26	RR (N)	123,403	86557	110.48
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		RR (S)	12,828	1432168	1635.57
		RR (East)	24,169	156082	159.48
		Total	1,080,994	8620411	9496.19
		2018-19			
		Circle	No. of Agl Services	Connected DTR Capacity (KVA)	Projected Annual Consumption (MU)
		Nalgonda	399095	2588505	3175.12
		Mahbubnagar	280296	2332890	1769.89
		Medak	130494	1020551	1218.85
		Siddipet	165981	1209822	1539.08
		RR (N)	123777	87953	118.77
		RR (S)	16417	1445555	1778.38
		RR (East)	24934	158936	164.51
		Total	1140994	8844211	9764.60
10	<p>To improve estimation of electricity consumption by agriculture pump sets these services need to be geo tagged as is being done in Andhra Pradesh. This exercise in AP has shown that more than 10% of these services are not in operation.</p> <p>Along with this feeder wise electricity consumption data need to be made available to cross check the numbers arrived using the present methodology. Record of feeder electricity consumption on a daily/monthly basis could be given organized division wise. This could be in easily accessible format (like MS-Excel) and available on the website of the DISCOMs.</p>	<p>It is to submit that, the assessment of agricultural consumption of all rural circles is being done every month as per the ISI methodology suggested by Hon'ble TSERC and submitted to the Hon'ble TSERC. TSERC has referred to ASCI to study any new methodology for calculation of AGL consumption. A joint meeting was conducted by ERC with Administrative Staff College of India & Discom officials on 22.08.2017 to chalk out a better method for calculation of the Agl. Consumption. ASCI is going to conduct a statistical analysis on the crop pattern, geographic location and working for preparation of new methodology of estimation of Agl. consumption. If this new methodology approved by TSERC it may be adopted by DISCOMS.</p>			
11	<p>Given the lack of transparency in estimating electricity consumption in the agriculture sector under the existing system it is better to explore alternative methods. Under UDAY TSDISCOMs are obliged to meter all DTRs including DTRs serving agriculture services by June 2017. We request the Commission to direct the</p>	<p>UDAY MoU specifies an action plan regarding DTR metering in urban area and there is no specification regarding the metering of all DTRs</p>			

	TSDISCOMs to estimate electricity consumption by the agriculture pump sets based on the readings of these meters. In this context we also would like to know the progress in metering DTRs in the state and the plan to complete it	
12	<p>24x7 Supply to Agriculture</p> <p>ARRs do not show information on what basis TSDISCOMs have taken up this 24x7 power supply for agriculture. It would be important to include a separate section on this and provide all technical, financial data and information. This assessment should include on what basis TSDISCOMs have arrived at 8.3 percent growth rate. How much is the investment – on generation, transmission and distribution? What would be the impact on tariff? What are the technical concerns and challenges that arise out of this supply?</p>	<p>24x7 supply of power to agricultural consumers is a policy decision of GoTS. TS discoms have taken measures for implementing this policy decision.</p> <p>The licensee has followed ISI methodology approved by erstwhile APERC for projecting agricultural sales. With regards to investment, it may be appreciated that Generation, Transmission and Distribution investments are made to ensure reliable and quality power supply to all consumers in the state. The impact of these investments on consumer category are captured in the cost of service model which takes into account the consumer category load profile as well in addition to the generation, transmission and distribution costs. The licensee has submitted the above details as a part of the ARR filing.</p>
13	<p>Power purchase costs:</p> <p>Given the surplus power situation power from TSGENCO stations of KTPS VII and BTPS shall not be scheduled. From this step fixed cost burden to the extent of Rs. 709.79 Crore can be reduced. Also PPAs for KTPS VII and BTPS are yet to be approved by the Commission. Power from BTPS and KTPS VII shall not be scheduled without subjecting the related PPAs to public process and regulatory approval.</p>	Power from KTPS VII and BTPS would be required to meet the growing energy requirements of the state. The licensee would enter into PPAs with these generating stations based on due approvals from the Hon'ble TSERC.
14	PPAs related to TSGENCO Hydel plants Priyadarsini Jurala and Punlichintala shall also go through public process and regulatory approval	TSDiscoms have entered PPAs with TSGENCO for Priyadarshini Jurala 6x39 MW and Pulichintala 4 x 30 MW Hydel stations on 22.12.2009 and 30.12.2010 respectively. Honble TSERC in its generation tariff order for the third control period 2014-19 has approved the fixed charges for these Hydel stations.
15	TSDISCOMs' ARR filings show that power from CSPGCL is proving to be costly. Per MW fixed cost burden of this plant is Rs. 1.87	The fixed cost per unit for CSPGCL has been considered as per the Tariff Order issued by Chattisgarh State Regulatory Commission.

	<p>Crore compared to Rs. 1.26 Crore of Singareni plant. Besides this, because of inter-state transmission 3.2% T&D losses are also to be accounted for. We request the Commission to direct TSDISCOMs to relook at power purchase from this plant.</p>	
16	<p>According to ARR filings, “The variable cost per unit of KTPS (A,B,C) and KTPS V is based on 15% escalation over approved VC for 2017-18. KTPS VI and RTS B are based on 10% escalation over approved values for 2017-18.” (TSSPDCL ARR p.57) No explanation for this escalation in variable cost is provided. This escalation shall not be allowed.</p>	<p>The licensee while projecting the VC of TS Genco stations considered the actual VC of TS Genco stations in H1 of 2017-18 and the projected cost of VC as given by generators. In many instances, the actual cost was exceeding the approved values by more than 10%. However with a view of not imposing additional burden due to higher PP cost, the licensee has limited the escalation on VC to 10% of the approved value.</p>
17	<p>Variable cost of TSGENCO thermal power plants range From Rs. 2.21 to Rs. 2.70 per unit. Compared to this variable cost of CSPGCL is Rs. 1.20 per unit. Most of TSGENCO thermal plants are pit head based or located near to the coal mines. Due to this variable cost of TSGENCO shall be lower than that quoted by them. We request the Commission to scrutinize variable cost claims of TSGENCO thermal power plants.</p>	<p>As per the clause 13.1(b) & (c) of TSERC regulations, the actual landed cost of fuel shall be claimed inclusive of fuel price corresponding to the grade/quality of fuel, royalty, taxes and duties as applicable, transportation cost by rail/ road/ pipeline or any other means, and, for the purpose of calculation of energy charges, shall be arrived at after considering transit losses. The landed cost of fuel in respect of TSGENCO stations s being arrived on the following</p> <ol style="list-style-type: none"> The Coal is being procured from M/s SCCL, a Govt. entity, and its Cost is being paid as per the price notifications of M/s SCCL. The Oil is being procured from central public sector undertakings viz. HPCL, IOCL &BPCL and the oil rates being paid prevailing on the date of Supply. The transportation charges of the fuel by rail is as per the rate circular issued by ministry of Railways. <p>The variable cost of the TSGENCO stations arrived by considering TSERC norms and the above information.</p>
18	<p>While TSGENCO plants are projected to operate at 70% PLF though their normative PLF is 80% TPCIL is projected to operate at 90% PLF though its normative PLF is 85%. Supply of power</p>	<p>As per the PPA with TPCIL, the normative PLF for recovery of fixed costs is 90%. Accordingly the PLF for TPCIL has been considered at 90%.</p>

	over and above threshold PLF involves payment of incentive which will be an additional burden. Given surplus power availability power from TPCIL shall be scheduled up to threshold PLF i.e., 85% only.	
19	TSDISCOMs projected procurement of 383.46 MU from bilateral/power exchange on short term basis. Given power surplus situation and over estimation of energy requirement procurement from bilateral/power exchange shall not be allowed.	The licensee while projecting the power purchase requirements has done so by running the Merit order. The projected demand in the month of August is higher than the availability from contracted sources resulting in a marginal shortfall for 383.46 MU. This deficit is proposed to be met through bilateral/ power exchange
20	<p>Arrears:</p> <p>According to ARR filings at the end of September 2017 both the DISCOMs together are facing arrears to the extent of Rs. 4,575.23 Crore from those who have to pay more than Rs. 50,000. Out of this SPDCL is facing arrears of Rs. 3,773.55 Crore which is equivalent to 16% of the proposed ARR for FY 2018-19. While SPDCL provided information on arrears consumer category wise NPDCL provided HT and LT category wise information only. We request the Commission to direct TSNPDCL to provide consumer category wise arrears data. Under SPDCL Rs. 1424.82 Crore are due from HT industrial units, Rs. 1541.17 Crore from street lights and PWS schemes and Rs. 564.17 Crore from lift irrigation schemes. According to Section 1.2 (i) of UDAY MoU “All outstanding dues from the state government departments to DISCOMs for supply of electricity shall be paid by 31.03.2017.” According to this document dues from state government departments as on 30.9.2016 were Rs. 2,416.62 Crore. Out of this Panchayat Raj accounted for Rs. 1,644.07 Crore, municipalities Rs. 139.53 Crore, Irrigation department Rs. 73.52 Crore and LIS Rs. 235.80 Crore. The present ARR filings show that the situation in fact deteriorated in spite of the UDAY MoU. Such huge arrears also involve significant financing costs. We request the Commission to direct the DISCOMs to take proactive steps to</p>	TSSPDCL has been addressing the DO letters continuously to the concerned HODs like Irrigation, Panchyat Raj, and Water works, HMWS&SB, Municipalities etc requesting to bridge the deficits/revenue gaps arising to TSSPDCL due to nonpayment of Electricity dues and payment are being received periodically.

	recover dues expeditiously.																									
21	Government has been promising subsidy for agricultural and the category of electricity consumption. However, this is not being reflected in the ARR of TSDISCOMs. It would help in understanding the financial realities, if a separate section is devoted for these kinds of subsidies. Most often ARR estimates precede TS government budget estimations. Thus, electricity subsidies as reflected in ARRs are at best expectations, and are not absolute. Assumptions of government subsidies in ARs may not match the State budget allocations presented in TS legislature in later days. In this regard, the Commission has to either ask for an undertaking from the government that responds to the subsidy expectations in ARRs, and/or direct DISCOMs to produce the basis for such expectations.	The GoTS has been providing the Tariff Subsidy to the DISCOMs as determined by the Honble Commission in its Tariff Order. The Tariff Subsidy is being finalized by the Honble TSERC upon receipt of consent under Section 65 of the Electricity Act, 2003 in respect of grant of subsidy for the corresponding financial year.																								
22	Nevertheless, there is often a gap between expectations of DISCOMs as reflected in the ARRs and government budgetary allocations, sanction and actual release of funds. This gap, between expectation by TSDISCOMs, budgetary allocations by the TS government and actual release of funds, also needs to be discussed by collating, collecting and presenting such data, from the previous year, in addition to the current Financial Year under discussion.	The revenue gap as finalized by the Honble Commission shall be met by the Tariff Subsidy from the GoTS as stipulated in the Tariff Order.																								
23	<p>Electrical accidents:</p> <table border="1"> <thead> <tr> <th></th> <th>2013-14</th> <th>2014-15</th> <th>2015-16</th> <th>2016-17</th> <th>2017-18 H1</th> </tr> </thead> <tbody> <tr> <td>SPDCL</td> <td>251</td> <td>307</td> <td>383</td> <td>349</td> <td>130</td> </tr> <tr> <td>NPDCL</td> <td>185</td> <td>147</td> <td>139</td> <td>329</td> <td>173</td> </tr> <tr> <td>Total</td> <td>436</td> <td>454</td> <td>522</td> <td>678</td> <td>303</td> </tr> </tbody> </table>		2013-14	2014-15	2015-16	2016-17	2017-18 H1	SPDCL	251	307	383	349	130	NPDCL	185	147	139	329	173	Total	436	454	522	678	303	Proportion of 85% of safety budget is allocated to rural circles where the accidents are on high side to take up the erection /rectification works like erection of intermediate poles wherever there are loose lines, erection of fencing, earthing etc, wherever necessitated. Further Safety week is conducted to create awareness among the consumers about the precautionary measures to be taken. Also
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25	<p>The above table shows that over the period fatal accidents are increasing. Despite DISCOMs' claims about taking precautionary and preventive steps to avert accidents their number is on the rise. In the FY 2016-17 the number of fatal accidents reached 678. During the first half of FY 2017-18 already 303 people died due to electrical accidents.</p> <p><u>Circle wise fatal electrical accidents</u></p> <table border="1"> <thead> <tr> <th>Circle</th> <th>2013-14</th> <th>2014-15</th> <th>2015-16</th> <th>2016-17</th> <th>2017-18 H1</th> </tr> </thead> <tbody> <tr> <td>Mahabubnagar</td> <td>115</td> <td>124</td> <td>126</td> <td>96</td> <td>40</td> </tr> <tr> <td>Medak</td> <td>7</td> <td>91</td> <td>123</td> <td>101</td> <td>28</td> </tr> <tr> <td>Nalgonda</td> <td>84</td> <td>46</td> <td>64</td> <td>71</td> <td>18</td> </tr> <tr> <td>Rangareddy South</td> <td>18</td> <td>21</td> <td>32</td> <td>43</td> <td>22</td> </tr> <tr> <td>Warangal</td> <td>55</td> <td>45</td> <td>41</td> <td>87</td> <td>43</td> </tr> <tr> <td>Karimnagar</td> <td>34</td> <td>56</td> <td>23</td> <td>80</td> <td>47</td> </tr> <tr> <td>Nizamabad</td> <td>37</td> <td>25</td> <td>24</td> <td>59</td> <td>26</td> </tr> <tr> <td>Adilabad</td> <td>44</td> <td>10</td> <td>15</td> <td>82</td> <td>45</td> </tr> </tbody> </table>						Circle	2013-14	2014-15	2015-16	2016-17	2017-18 H1	Mahabubnagar	115	124	126	96	40	Medak	7	91	123	101	28	Nalgonda	84	46	64	71	18	Rangareddy South	18	21	32	43	22	Warangal	55	45	41	87	43	Karimnagar	34	56	23	80	47	Nizamabad	37	25	24	59	26	Adilabad	44	10	15	82	45	Suggestion is noted.
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26	<p>Mahabubnagar, Nalgonda, Medak+ Siddipet and Ranga Reddy-South Circles under SPDCL; Karimnagar, Warangal, Nizamabad and Adilabad Circles under NPDCL are recording high fatal accidents. There has to be special attention to analyse and reduce accidents in these circles.</p>						The data has been submitted as per the prescribed format of Hon'ble TSERC.																																																						
27	<p>SPDCL has given a general answer listing the causes, but not given the numbers. Hence it has not complied with the directive of the Commission. SPDCL should also give the break-up as done by</p>						The reasons for accidents submitted in the ARR filing are as per the Format No. 20 of Central Electricity Authority which are submitted on regular intervals to CEA.																																																						

	NPDCL.	Further the information on the number of accidents against the causes and the preventive measures adopted are submitted to the Hon'ble TSERC in compliance with the Directive No. 9.9.2
28	The Construction, Operation & Maintenance of electrical plant & lines especially at distribution level by DISCOMs is in a very unsafe condition. DISCOMs are not following the basic statutory safety regulations of CEA. The state government and its CEIG are not taking action on DISCOMs	The norms of fencing & minimum clearance as per I.E are in practice
29	At many places especially in rural areas, bare live parts in DTRs and associated bare lines and wires are not kept inaccessible to living beings. Barriers, fences and enclosures and minimum clearances to ground are not maintained so that live parts are out of reach to prevent fatal shocks as required in Regulations 58,17,37(1) and 44(1)(i) of CEA (Measures relating to safety and electric supply) Regulation, 2010	
30	To the best of our knowledge TSDISCOMs are not implementing the above mandatory regulations. TSERC is requested to order TSDISCOMs to submit detailed report and evidence to show their top down commitment to these management level Regulations.	As per the TSERC directions, TSSPDCL has nominated Officer of the cadre of Divisional Engineer/ Construction of each circle as Safety officer vide Memo No. CGM(O&M)/SE(O&M)/DE(O&M)-I/F. /D.No. 2272/17 dt. 01.03.17.
31	Public awareness is very important in promoting electrical safety. TSDISCOMs do not have any materials even in their websites for creating awareness in safety among general public and consumers. Recently IEEE Hyderabad Section produced a video film (https://www.youtube.com/watch?v=a_7rUxhvVs) and designed posters on electrical safety. These may be used by TSDISCOMs in their work on promoting electrical safety.	The suggestion is noted.
32	Accident statements / statistics are not available to public. These must be kept in public domain and submitted annually to E R C. Many Circles in DISCOMs do not discharge their statutory duty of informing details of accidents to CEIG. Auditing and accident	The statistics on accidents are submitted on regular intervals to CEA. Also the information on number of accidents are provided in the ARR filings which are available to the public. On occurrence of accident the same is informed to CEIG within 24 hours.

	investigations need to be reviewed by an independent agency like E R C. Action is not taken many a time by DISCOMs even when dangerous conditions are brought to the notice by public and media.	Whenever brought to the notice of TSSPDCL officials, the rectification action is generally taken however in certain cases where the accident is on account of consumer negligence i.e construction of building without maintaining sufficient clearance to already existing lines, intimation for payment for taking up the work is given.																																																						
33	There is need to improve compensation payment to victims families. In the case of SPDCL during FY 2016-17 out of 349 fatal accidents compensation was paid in 180 cases and during FY 2017-18 H1 out of 130 fatal accidents only 23 victims families received compensation. In the case of NPDCL during FY 2016-17 out of 329 fatal accidents compensation was paid in 222 cases and during FY 2017-18 H1 out of 173 fatal accidents 144 victims families received compensation. During FY 2016-17 exgratia has been paid to 59% cases in TS, 52% in SPDCL and 67% in NPDCL.	All the cases where the necessary documents are submitted such as FIR, postmortem, legal heir, panchanama, death certificate, exgratia proposals are sanctioned without any delay. For the convenience of the consumer, weblink for uploading the required documents has also been provided in the TSSPDCL website.																																																						
34	<p>DTR Failures:</p> <table border="1"> <thead> <tr> <th>Year</th> <th>DTR Particulars</th> <th>SPDCL</th> <th>Mahabu bnagar Circle</th> <th>NPDCL</th> <th>Warangal Circle</th> </tr> </thead> <tbody> <tr> <td rowspan="3">2013-14</td> <td>Total DTRs</td> <td>2,54,603</td> <td>54,807</td> <td>2,09,195</td> <td>48,350</td> </tr> <tr> <td>DTRs failed and replaced</td> <td>42,278</td> <td>13,074</td> <td>30,666</td> <td>8,648</td> </tr> <tr> <td>% of DTRs failed and replaced</td> <td>16.01</td> <td>23.85</td> <td>14.66</td> <td>17.89</td> </tr> <tr> <td rowspan="3">2014-15</td> <td>Total DTRs</td> <td>2,55,489</td> <td>54,807</td> <td>2,26,885</td> <td>55,078</td> </tr> <tr> <td>DTRs failed and replaced</td> <td>35,045</td> <td>12,419</td> <td>28,604</td> <td>7,407</td> </tr> <tr> <td>% of DTRs failed and replaced</td> <td>13.72</td> <td>22.66</td> <td>12.61</td> <td>13.45</td> </tr> <tr> <td rowspan="3">2015-16</td> <td>Total DTRs</td> <td>2,92,654</td> <td>63,740</td> <td>2,42,539</td> <td>59,343</td> </tr> <tr> <td>DTRs failed and replaced</td> <td>31,267</td> <td>10,049</td> <td>28,031</td> <td>8,108</td> </tr> <tr> <td>% of DTRs failed</td> <td>10.68</td> <td>15.77</td> <td>11.56</td> <td>13.66</td> </tr> </tbody> </table>	Year	DTR Particulars	SPDCL	Mahabu bnagar Circle	NPDCL	Warangal Circle	2013-14	Total DTRs	2,54,603	54,807	2,09,195	48,350	DTRs failed and replaced	42,278	13,074	30,666	8,648	% of DTRs failed and replaced	16.01	23.85	14.66	17.89	2014-15	Total DTRs	2,55,489	54,807	2,26,885	55,078	DTRs failed and replaced	35,045	12,419	28,604	7,407	% of DTRs failed and replaced	13.72	22.66	12.61	13.45	2015-16	Total DTRs	2,92,654	63,740	2,42,539	59,343	DTRs failed and replaced	31,267	10,049	28,031	8,108	% of DTRs failed	10.68	15.77	11.56	13.66	<p>Licenseses 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>With the above measuers in TSSPDCL, the DTR Failure rate has come down. During FY 2017-18, the total no. of DTRs as on Dec'17 is 3,70,113 while the no. of failed DTRs is 25,144 i.e., 6.79%. In Mahabubnagar circle the no. of DTRs existing in Dec'17 are 29,155 &</p>
Year	DTR Particulars	SPDCL	Mahabu bnagar Circle	NPDCL	Warangal Circle																																																			
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		and replaced					the no. of failed DTRs is 2486 i.e., 8.53%.
	2016-17	Total DTRs	3,18,765	67,412	2,55,087	59,528	
		DTRs failed and replaced	40,199	11,522	32,360	8,644	
		% of DTRs failed and replaced	12.61	17.09	12.67	14.52	
35	<p>Every year more than 10% of the DTRs in the state are failing and need to be attended to. Though over the period there is decline in percentage of DTRs failing still the existing levels of failure is unacceptable. Special attention needs to be paid to circles with high failure rate. Mahabubnagar circle's (under SPDCL) performance needs to be thoroughly scrutinized. In 2016-17 more than 17% of the DTRs in this circle need to be repaired. This also indicates the quality of service the consumers in that circles are receiving. Incidentally, Mahabubnagar circle is regularly recording high rate of fatal accidents in the state. Procurement, operation and maintenance, and repair of these DTRs need to be examined.</p>						
36	<p>These tables refer to DTs replaced. Consumer supply is affected also due to DT failure, 11 kV feeder outage, 33 kV feeder outage etc. From the information provided, it is not possible to get an idea of the total duration of outage faced by the consumer. Considering the nearly all households have connection and the objective is to provide 24 x 7 power supply to all consumers, the focus of the DISCOMs now should be closely monitor the quality of supply. We request the DISCOMs to provide circle wise information about quality of supply over the past few years. Suggested format is given below: DISCOM name: Year:</p>						<p>The information on Feeder Outages is already available in performance reports (Format 5, Format 6a and Format 6b) of the ARR filings.</p>

	Circle	Number of consumers	Outage hours/consumer due to fuse off	Outage hours/consumer due to service wire	Outage hours/consumer due to DT	Outage hours/consumer due to 11 kV feeder	Outage hours/consumer due to 33 kV feeder	
38	Poly House/Green Houses: In the last tariff order, based on DISCOM petition and public hearing discussions, polyhouses and green-houses have been included in LT-V category. While this is welcome, it will be good to monitor the consumption by this group of consumers. We suggest that these consumers be metered, and the number, connected load and consumption by them reported separately in the tariff filings.							Suggestion is noted

S.No.	Summary of Objections / Suggestions	Response of the Licensee
29. Solnova Power Pvt Ltd, Vaishnavi;s Tanmai Plaza, 4th Floor, Gachibowli, X Road beside flyover, Hyderabad-500032, www.solnovapower.com		
1	<p>The Honorable commission (TSERC) Vides its order dated: 22-12-2017 in O.P.No. 23 of 2016, passed an amendment order to the retail supply tariff order for the year 2017-18 duly exempting solar projects from levy of CSS in line with the Combined AP solar policy of 2012 and Telangana Government Solar Policy of 2015.</p> <p>Now in line with these government policies it is requested to Honorable Commission (TSERC) for exempting solar projects from levy of CSS and Additional Surcharge (ASS) in its retails supply tariff order for the year 2018-19.</p>	<p>As the Telangana Solar power policy will be in force for five years from 01.06.2015, therefore, the licensee requests the Hon'ble Commission to continue the exemption of Cross Subsidy Surcharge for the open access consumers within state buying solar power from solar power developers for the FY2018-19 as stipulated in Solar Power Policy in accordance to the amendment to Cross Subsidy Surcharge order for FY 2017-18 dt.22.12.2017.</p> <p>As the exemption of Additional surcharge is not stipulated in the AP Solar Policy of 2012 and Telangana Government Solar Policy of 2015, additional surcharge shall be levied on Open acces consumers availing supply from solar power developers also in order that the DISCOMs shall not forego its legitimate revenue to recover its costs</p>
2	<p>With respect to APERC order APERC/Secy/25/2013 dated 04-05-2013 we request Honorable Commission (TSERC) to give relief to solar developers/generator/consumers by exempting from the levy of TOD charges by including it in the tariff order</p> <p>The exemptions requested above be allowed to the solar projects set up under A.P.. Solar policy, 2012 & Telangana Solar Policy, 2015.</p>	<p>The levy of ToD charges is to maintain Grid Stability and to contain the Peak loads. Hence it shall be continued.</p>
3	<p>This hefty CSS, Additional Surcharge and TOD levy is compounding to our already existing heavy burden emanating from all other outstanding issues in open access power supply which is making our life miserable and we are sure we cannot survive any further. We are unable to honour our bank debt obligations, pay salaries to our employees and operate our plant smoothly in the current environment. And we are running from pillar to post every year on the same issue. While, EASE OF DOING Business provisions are hardly being manifested by the utilities as the enabling provisions are hardly been proactively</p>	<p>The levy of Cross Subsidy Surcharge and Aditonal Surcharge is as per the mandate of the Electricity Act, 2003.</p> <p>Any relief in Cross Subsidy Surcharge and Additional Surcharge will lead to underrecovery of costs to the DISCOMs and have impact on the financials of the DISCOMs</p>

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S.No.	Summary of Objections / Suggestions	Response of the Licensee
30. Value Labs, Plot No. 41, HITEC city, Phase-Ii Madhapur, Hyderabad – 500 081 india, Ph: 91-040 6623-9000		
1	<p>The Honorable commission (TSERC) Vides its order dated: 22-12-2017 in O.P.No. 23 of 2016, passed an amendment order to the retail supply tariff order for the year 2017-18 duly exempting solar projects from levy of CSS in line with the Combined AP solar policy of 2012 and Telangana Government Solar Policy of 2015.</p> <p>Now in line with these government policies it is requested to Honorable Commission (TSERC) for exempting solar projects from levy of CSS and Additional Surcharge (ASS) in its retails supply tariff order for the year 2018-19.</p>	<p>As the Telangana Solar power policy will be in force for five years from 01.06.2015, therefore, the licensee requests the Hon'ble Commission to continue the exemption of Cross Subsidy Surcharge for the open access consumers within state buying solar power from solar power developers for the FY2018-19 as stipulated in Solar Power Policy in accordance to the amendment to Cross Subsidy Surcharge order for FY 2017-18 dt.22.12.2017.</p> <p>As the exemption of Additional surcharge is not stipulated in the AP Solar Policy of 2012 and Telangana Government Solar Policy of 2015, additional surcharge shall be levied on Open acces consumers availing supply from solar power developers also in order that the DISCOMs shall not forego its legitimate revenue to recover its costs</p>
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3	<p>This hefty CSS, Additional Surcharge and TOD levy is compounding to our already existing heavy burden emanating from all other outstanding issues in open access power supply which is making our life miserable and we are sure we cannot survive any further. We are unable to honour our bank debt obligations, pay salaries to our employees and operate our plant smoothly in the current environment. And we are running from pillar to post every year on the same issue. While, EASE OF DOING Business provisions are hardly being manifested by the utilities as the enabling provisions are hardly been proactively implemented.investment climate in our newly born state has been greatly being jeopardized. It seemed we have just had relief of</p>	<p>The levy of Cross Subsidy Surcharge and Aditonal Surcharge is as per the mandate of the Electricity Act, 2003.</p> <p>Any relief in Cross Subsidy Surcharge and Additional Surcharge will lead to underrecovery of costs to the DISCOMs and have impact on the financials of the DISCOMs</p>

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S.No.	Summary of Objections / Suggestions	Response of the Licensee
31. Sitapuram Power Limited, Corporate Office 8-2-293/82/431/A, Road No. 22, Jublee hills. Hyderabad – 500 033 Tel: +91-40-23559922-25		
1	<p><u>Objection on rate of demand charges and minimum consumption charges applicable for power plants having connection for utilization of start up power:</u></p> <p>Start-up power supply is required by Generating plants before COD during their synchronization with the Grid, and after COD to re-start generation after planned and/or forced shutdowns. Such “start-up” power supply is essential for Generating units, though utilized infrequently. However, in Telangana, the Generating plant is required to take a supply connection from the power distribution licensee for such infrequent occasions, and to pay demand charges on monthly basis irrespective of whether or not the supply from the Distribution Licensee is actually availed or not. For such connections, the power distribution companies in Telangana are charging as under</p> <p>a). Demand Charges at 50% rate is being collected on monthly basis whether or not supply from Distribution Licensee is actually availed or not.</p> <p>b). Energy charges are being billed for minimum energy consumption @ 50kVAh per kVA of billing demand for HT-II category and @25 kVAh per kVA of billing demand for HT-I irrespective of whether or not the supply from the Distribution Licensee is actually availed or not.</p> <p>Considering the fact that power generating company is not a real consumer, in the state of Odisha, The Hon’ble Orissa Electricity Regulatory Commission has considered the power generating plants under separate category. For this category demand charges are not applicable and Energy charges will be collected only on actual consumption</p>	<p>The Discom shall be in a position to meet the total demand of its consumers all the time. Therefore Discom has to enter in to agreements with the Various generators for supplying the required CMD to the Consumer always and the Discom has to pay the fixed charges to Generators even if the Discom doesn’t utilise the power. Hence to recover these fixed charges, Discom is levying the minimum demand charges at 80% of CMD on the consumers.</p> <p>Further, considering the request of consumers, the Hon’ble Commission in the Tariff Order 2017-18 has fixed the demand charges to be paid by captive power plants availing power for start-up power at the rate of 50% of the demand charges of the respective consumer category.</p>

	<p>Further, in the state of Maharashtra, for start-up power supply connections, The Hon'ble ERC had fixed the demand charges at 25% rate.</p> <p><u>Considering the facts, we humbly pray the Hon'ble Commission for revisiting the demand charges and energy charges to be charged for the power generating plants having start-up power connections as furnished below:</u></p> <ol style="list-style-type: none">a. Remove the demand charges or reduce the rate of demand charges to 25% from existing 50% rate.b. Since the nature of start-up power connections are standy and only to draw occasionally as and when required, we humbly request the Hon'ble Commission to delete the clause of minimum billing. Billing shall be only on actual consumption.	
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S.No.	Summary of Objections / Suggestions	Response of the Licensee
32. Bhagyanagar India Limited, 5th Floor Surya Towers, Sardar patel Road, sec-500 003 telangana india Tel: +91-40-27845119, www.surana.com		
1	<p>The Honorable commission (TSERC) Vides its order dated: 22-12-2017 in O.P.No. 23 of 2016, passed an amendment order to the retail supply tariff order for the year 2017-18 duly exempting solar projects from levy of CSS in line with the Combined AP solar policy of 2012 and Telangana Government Solar Policy of 2015.</p> <p>Now in line with these government policies it is requested to Honorable Commission (TSERC) for exempting solar projects from levy of CSS and Additional Surcharge (ASS) in its retails supply tariff order for the year 2018-19.</p>	<p>As the Telangana Solar power policy will be in force for five years from 01.06.2015, therefore, the licensee requests the Hon'ble Commission to continue the exemption of Cross Subsidy Surcharge for the open access consumers within state buying solar power from solar power developers for the FY2018-19 as stipulated in Solar Power Policy in accordance to the amendment to Cross Subsidy Surcharge order for FY 2017-18 dt.22.12.2017.</p> <p>As the exemption of Additional surcharge is not stipulated in the AP Solar Policy of 2012 and Telangana Government Solar Policy of 2015, additional surcharge shall be levied on Open acces consumers availing supply from solar power developers also in order that the DISCOMs shall not forego its legitimate revenue to recover its costs</p>
2	<p>With respect to APERC order APERC/Secy/25/2013 dated 04-05-2013 we request Honorable Commission (TSERC) to give relief to solar developers/generator/consumers by exempting from the levy of TOD charges by including it in the tariff order</p> <p>The exemptions requested above be allowed to the solar projects set up under A.P.. Solar policy, 2012 & Telangana Solar Policy, 2015.</p>	<p>The levy of ToD charges is to maintain Grid Stability and to contain the Peak loads. Hence it shall be continued.</p>
3	<p>This hefty CSS, Additional Surcharge and TOD levy is compounding to our already existing heavy burden emanating from all other outstanding issues in open access power supply which is making our life miserable and we are sure we cannot survive any further. We are unable to honour our bank debt obligations, pay salaries to our employees and operate our plant smoothly in the current environment. And we are running from pillar to post every year on the same issue. While, EASE OF DOING Business provisions are hardly being manifested by the utilities as the enabling provisions are hardly been proactively</p>	<p>The levy of Cross Subsidy Surcharge and Additonal Surcharge is as per the mandate of the Electricity Act, 2003.</p> <p>Any relief in Cross Subsidy Surcharge and Additional Surcharge will lead to underrecovery of costs to the DISCOMs and have impact on the financials of the DISCOMs</p>

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S.No.	Summary of Objections / Suggestions	Response of the Licensee
33. Surana Solar Systems Pvt Ltd, 5th Floor Surya Towers, Sardar Patel Road, sec-500 003 telangana india , ph :- 44665700 www.surana.com		
1	<p>The Honorable commission (TSERC) Vides its order dated: 22-12-2017 in O.P.No. 23 of 2016, passed an amendment order to the retail supply tariff order for the year 2017-18 duly exempting solar projects from levy of CSS in line with the Combined AP solar policy of 2012 and Telangana Government Solar Policy of 2015.</p> <p>Now in line with these government policies it is requested to Honorable Commission (TSERC) for exempting solar projects from levy of CSS and Additional Surcharge (AS) in its retails supply tariff order for the year 2018-19.</p>	<p>As the Telangana Solar power policy will be in force for five years from 01.06.2015, therefore, the licensee requests the Hon'ble Commission to continue the exemption of Cross Subsidy Surcharge for the open access consumers within state buying solar power from solar power developers for the FY2018-19 as stipulated in Solar Power Policy in accordance to the amendment to Cross Subsidy Surcharge order for FY 2017-18 dt.22.12.2017.</p> <p>As the exemption of Additional surcharge is not stipulated in the AP Solar Policy of 2012 and Telangana Government Solar Policy of 2015, additional surcharge shall be levied on Open access consumers availing supply from solar power developers also in order that the DISCOMs shall not forego its legitimate revenue to recover its costs.</p>
2	<p>With respect to APERC order APERC/Secy/25/2013 dated 04-05-2013 we request Honorable Commission (TSERC) to give relief to solar developers/generator/consumers by exempting from the levy of TOD charges by including it in the tariff order</p> <p>The exemptions requested above be allowed to the solar projects set up under A.P.. Solar policy, 2012 & Telangana Solar Policy, 2015.</p>	<p>The levy of ToD charges is to maintain Grid Stability and to contain the Peak loads. Hence it shall be continued.</p>
3	<p>This hefty CSS, Additional Surcharge and TOD levy is compounding to our already existing heavy burden emanating from all other outstanding issues in open access power supply which is making our life miserable and we are sure we cannot survive any further. We are unable to honour our bank debt obligations, pay salaries to our employees and operate our plant smoothly in the current environment. And we are running from pillar to post every year on the same issue. While, EASE OF DOING Business provisions are hardly being manifested by the utilities as the enabling provisions are hardly been proactively</p>	<p>The levy of Cross Subsidy Surcharge and Additonal Surcharge is as per the mandate of the Electricity Act, 2003.</p> <p>Any relief in Cross Subsidy Surcharge and Additional Surcharge will lead to underrecovery of costs to the DISCOMs and have impact on the financials of the DISCOMs</p>

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S.No.	Summary of Objections / Suggestions	Response of the Licensee
34. Indian Solar Power Producers Association, 5th floor, Surya Towers, Sardar patel Road, Sec-500 003, Tel: +91-40-27845119		
1	<p>The Honorable commission (TSERC) Vides its order dated: 22-12-2017 in O.P.No. 23 of 2016, passed an amendment order to the retail supply tariff order for the year 2017-18 duly exempting solar projects from levy of CSS in line with the Combined AP solar policy of 2012 and Telangana Government Solar Policy of 2015.</p> <p>Now in line with these government policies it is requested to Honorable Commission (TSERC) for exempting solar projects from levy of CSS and Additional Surcharge (ASS) in its retails supply tariff order for the year 2018-19.</p>	<p>As the Telangana Solar power policy will be in force for five years from 01.06.2015, therefore, the licensee requests the Hon'ble Commission to continue the exemption of Cross Subsidy Surcharge for the open access consumers within state buying solar power from solar power developers for the FY2018-19 as stipulated in Solar Power Policy in accordance to the amendment to Cross Subsidy Surcharge order for FY 2017-18 dt.22.12.2017.</p> <p>As the exemption of Additional surcharge is not stipulated in the AP Solar Policy of 2012 and Telangana Government Solar Policy of 2015, additional surcharge shall be levied on Open access consumers availing supply from solar power developers also in order that the DISCOMs shall not forego its legitimate revenue to recover its costs</p>
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S.No.	Summary of Objections / Suggestions	Response of the Licensee
35.	G. Arundathi , Amdapur village, moinabad Mandal, RR-Dist Cell.No.	
i	<p>నేను 2014 లో DD కట్టినాను. నాకు Estimate 15 /02/2017 నాడు Estimate అయినది కానీ ఇప్పటి వరకు నాకు ఎలాంటి పని జరగలేదు. కావున తమరు మా పై దయదలచి మాకు న్యాయము చేయగలరని మా యొక్క మనవి.</p>	<p>పని పూర్తియైనది. సర్వీస్ (నెంబర్ 8102 00903) రిలీజ్ చేయబడినది</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
36. Y. Narsimha Reddy, Amdapur Village, Moinabad Mandal, RR District Telangana, Cell.No. 9690661357		
i	<p>వ్యవసాయం కొరకు కొత్త లైసు కు DD, 2014 లోకట్టినము.మాకు Estimate copy 02/2017లో రావడం జరిగింది. కానీ ఇంతవరకు ఏ పని జరగలేదు. కావున మా యొక్క పనిని పూర్తి పూర్తి చేయించగలరని విన్నవించుకుంటున్నాను.</p>	<p>పొడిగింపు పనులు చేయవల్సిన అవసరం లేదు. సర్వీస్ (నెంబర్ 8102 00942) రిలీజ్ చేయబడినది</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
37. G. Buchi Reddy, Amdapur Village, Moinabad Mandal, RR-district Telangana, Cell No.		
i	<p>వ్యవసాయం కొరకు కొత్త విద్యుత్ లైను మరియు Transformer కొరకు 2014 సంవత్సరంలో DD కట్టడమైనది. దీనికి 2017/02/15 తేదీన estimated copy ఇవ్వడమైనది. కానీ పని జరగలేదు. కావున మా యొక్క పనిని పూర్తి పూర్తి చేయించగలరని విన్నవించుకుంటున్నాను.</p>	<p>పని పూర్తియైనది. సర్వీస్ (నెంబర్ 8102 00946) రిలీజ్ చేయబడినది</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
38.M. Penta Reddy, Amdapur Village, Moinabad Mandal, RR-District Cell.No. 9390084314		
i	<p>నేను AGL కొరకు 3 DDలు కట్టినాను. 2014లో రెండు DDలు కటినాను, ఇంకొకటి 2017లో, మొత్తము మూడు DDలు సంబంధిత అధికారులకు ఇచ్చినాను. ఇప్పటి వరకు నాకు స్తంబాలు కానీ ఎలాంటి మెటీరియల్ లేదు. కావున తమరు మా పై దయదలచి మాకు న్యాయము చేయగలరని మా యొక్క మనవి.</p>	<p>ఎస్టిమేట్ FIFO సీనియారిటీ ప్రకారం తయారు చేయవలెను ప్రస్తుత సీనియారిటీ నెంబర్ 48</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
39. G. Karnakar Reddy, Amdapur Village, Moinabad Mandal, RR-District Telangana State Cell.no. 9666293640		
i	<p>నేను 2014 లో DD కట్టినాను.మరియు 15/2/2017 లో Estimate అయినది. కానీ ఇప్పటి వరకు ఎలాంటి పని జరగలేదు. కావున తమరు మా పై దయదలచి మాకు న్యాయము చేయగలరని మా యొక్క మనవి .</p>	<p>పని పూర్తియైనది. సర్వీస్ (నెంబర్ 8102 00940) రిలీజ్ చేయబడినది</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
40.G. Shankar Reddy, Amdapur Village, Moinabad Manadal,RR District		
i	<p>నా యొక్క ట్రాన్స్ఫార్మర్ మీద ఓవర్ లోడ్ కారణంగా సంబంధిత అధికారులను సంప్రదించగా వారు (AGL) 100 KV DTR Estimate copys మాకు ఇచ్చి ADE గారు DE దగ్గరకు వెళ్ళమని మా తో చెప్పి పంపినారు. మేము DE గారి దగ్గరకు Estimate copys తీసుకొని వెళ్ళగా DE గారు మా పై కోపం తోని బెదిరించి. అట్టి estimate copys ను దగ్గర పెట్టుకొని వెళ్ళిపోమ్మని మాతోని అన్నారు. తరువాత ADE గారిని మేము సంప్రదించగా నాకు సంబంధం లేదు, మీకు నేను estimate copys ఇచ్చినాను అది మీరే చూసుకోవాలి అని, తరువాత మేము DE గారి దగ్గరకు వెళ్ళితే మాకు ఖర్చులు అవుతాయి అని ADE గారు మాతో అంటున్నారు. ఈ యొక్క సమస్య పై చర్య తీసుకొని మాకు న్యాయము చేయగలరని నా యొక్క మనవి.</p>	<p>ఎస్టిమేట్ ఇంప్రూవ్మెంట్ వర్క్స్ క్రింద మంజూరు అయినది. అగ్రిమెంట్ జరిగినది. పని జరుగుతోంది. పని 28 ఫిబ్రవరి 2018 కి పూర్తి అవుతుంది</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
41. G. Satyanarayana Reddy, 9849888787, Amdapur, Minabad Mandal , R.R. District		
i	నేను DD 2014 లో కట్టినాను. తరువాత 16/02/17 లో estimate అయినది. కానీ ఇప్పటి వరకు నాకు ఎలాంటి పని జరగలేదు. కావున తమరు మాకు న్యాయము చేయగలరని నా యొక్క మనవి.	పని పూర్తియైనది. సర్వీస్ (నెంబర్ 8102 00954) రిలీజ్ చేయబడినది

S.No.	Summary of Objections / Suggestions	Response of the Licensee
42.G. Sai Reddy, 9849234664, Amdapur, Moinabad Mandal, R.R. District		
i	<p>మేము 2014 నాడు DD లు కట్టినాము. మాకు estimate 14/12/2017 నాడు estimate వేసినారు కానీ ఇప్పటి వరకు మాకు ఎలాంటి పని జరగలేదు. కావున తమరు మా పై దయదలచి మాకు న్యాయము చేయగలరని మా యొక్క మనవి.</p>	<p>పని పూర్తియైనది. సర్వీస్ రిలీజ్ చేయబడినది G Chandrapal Reddy- సర్వీస్ నెంబర్- Sc.No.8102 00945 G Narsimha Redy- సర్వీస్ నెంబర్- Sc.No.8102 00904 G Sai Reddy- సర్వీస్ నెంబర్- Sc.No.8102 00902 & G Srinivas Reddy- సర్వీస్ నెంబర్- Sc.No.8102 00944</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
43.Hindustan Petroleum Corporation Limited, South Central zone, Parisram Bhavan, 7th Floor, 5-9-58/B, Fateh Maidan Road, Basheer Bagh, Hyd-500 004		
1	<p>It is prayed that this Honourable Commission may be pleased to issue an Order</p> <ol style="list-style-type: none"> a. Removing Gas/Oil Storage/Transfer stations operated the Respondent Corporation in the State of Telangana from the application of sec 8.85(iii) of the Tariff Order dated 26.08.2017 b. Declaring that HT-I, Industrial Category tariff is applicable to gas/oil storage transfer stations operated by the Respondent Corporation in the State of Telangana. c. Consequently, direct the Petitioner to categorize the electrical connections of gas/oil storage/transfer operated by the Respondent Corporation in the State of Telangana under H.T. Category-I d. Direct the petitioner to adjust the excess amounts already paid by the Respondent corporation under HT-Category-II in future bills. e. And pass such other order or orders as this Honourable Court deems fit and proper in the circumstances of the Case. 	<p>The Categorisation of activity is based on definitions & Terms and conditions as stipulated in the Tariff Order. Hence, in accordance to the Honble Commission's Tariff Order, the HT-I Industry is applicable for supply to all HT consumers using electricity for industrial purpose. Industrial purpose shall mean manufacturing, processing and/or preserving goods for sale, ...</p> <p>Hence as there is no manufacturing activity involved in gas/oil storage/transfer stations, they are re-categorized from HT-I Industrial Category to HT-II Others Category as per the Tariff Order. In the Tariff Order 2017-18, certain activities including gas/oil storage/transfer stations which do not come under Industrial Category are listed and the terms and conditions for applicability of HT-I Industrial category was modified accordingly as per the Licensee's proposal in order to bring clarity among the field officers in implementing the Tariff Order uniformly.</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
44.The Federation of Telangana and AndhraPradesh Chambers of Commerce and Industry, Federation House, FAPCII Marg, Red Hills, Hyderabad.		
1	<p data-bbox="370 310 1137 342">1. NON ADHERENCE TO MYT REGULATIONS:</p> <p data-bbox="317 396 1381 553">The Hon'ble Commission has granted permission to the Distribution Licensee for filing the ARR and Tariff determination on an annual basis till 2017-18 and 2018-19 is the last year of the Third Control Period.</p> <p data-bbox="317 607 1381 1117">The petitioner has not filed True-Up for the past years stating that: 'the Licensee is currently in the process of estimating revenues and provisional true-up for 2017-18. It stated that due to the policy decision of Govt of Telangana, three phase power needs to be supplied to all agricultural consumers for 24 hrs /day from January 1 2018, will have significant impact on the agricultural sales. In addition, there is high volume of sales estimated from Lift Irrigation Schemes (LI). ' The petitioner prays that the Hon'ble Commission may allow the Licensee to file provisional true-up for 2017-18 separately along with final true-up of 2016-17.</p> <p data-bbox="317 1170 1381 1414">It may be true that the Hon'ble Commission may have powers to relax any provision of the Tariff Regulations. However, by not filing any claims towards truing up for previous years and thus not furnishing the actual audited data to substantiate the instant projections, the petitioner appears to have a conspicuous interest in deferring the costs and proposing it in the form of tariff hikes in</p>	<p data-bbox="1400 607 2489 1029">For the reasons stated by licensee there is high degree of uncertainty involved in estimating the true-ups for FY 2017-18 due to 24 hrs supply to agricultural consumers as well as LI schemes. For avoiding any undue burden on the consumers, the licensee has submitted to Hon'ble Commission for filing of true-up in the ensuing year. Further the licensee has submitted petition to Hon'ble Commission for making amendments to the Principal Regulation 4 of 2005 which under consideration. The licensee also has submitted a prayer on treatment of agricultural sales and losses which are likely to impact the true-up.</p> <p data-bbox="1400 1040 2322 1117">In view of the above, the licensee has submitted to Hon'ble Commission for filing of True-ups separately.</p>

	<p>future. In view of this, the instant petitions are opposed to the Tariff Regulations, the principal guidelines of Tariff Policy and therefore liable to be rejected, <i>in limine</i></p>	
<p>2</p>	<p>1. REVENUE GAP:</p> <p>For the year 2018-19, TSSPDCL has shown aggregate revenue requirement of Rs.23,518.88 crore and total revenue at current tariffs, including non-tariff income, of Rs.19,296.50 crore, with a revenue deficit of Rs.4222.38 crore, while TSNPDCL has shown aggregate revenue requirement of Rs.12255.40 crore and total revenue at current tariffs, including NTI, of Rs.6706.00 crore, with a revenue deficit of Rs.5548.60 crore. Both the DISCOMs have not proposed any tariff hike, except making some modifications in tariff for lift irrigation schemes and introducing a new category for electrical vehicles, and requested the Hon'ble Commission to permit them to collect tariffs determined by it for the year 2017-18 for the year 2018-19 also.</p> <p>The DISCOMs have not explained how they propose to bridge the projected revenue gap of Rs.9970.98 crore and to what extent the Government of Telangana State would provide subsidy to bridge the projected revenue gap.</p> <p>There is a substantial revision of net revenue gap of Rs.5031.17 crore shown by TSSPDCL and of Rs.1793.42 crore by TSNPDCL for the year 2017-18. The substantial revised revenue gap of Rs.6824.59 crore for the year 2017-18 has to be seen in the light</p>	<p>For the reasons stated by licensee there is high degree of uncertainty involved in estimating the true-ups for FY 2017-18 due to 24 hrs supply to agricultural consumers as well as LI schemes. For avoiding any undue burden on the consumers, the licensee has submitted to Hon'ble Commission for filing of true-up in the ensuing year. Further the licensee has submitted petition to Hon'ble Commission for making amendments to the Principal Regulation 4 of 2005 on 11.08.2017 which is under consideration. The licensee also has submitted a prayer on treatment of agricultural sales and losses which are likely to impact the true-up.</p> <p>In view of the above, the licensee has submitted to Hon'ble Commission for filing of True-ups separately.</p> <p>The licensee expects to bridge the deficit through suitable support from GoTS after due scrutiny of the deficit by Hon'ble Commission.</p>

	<p>of no revision of tariffs for the same year.</p> <p>The proposal of the DISCOMs not to hike tariffs for the year 2018-19 and their failure to explain how they propose to bridge the projected revenue gaps for the same year and for various other factors not taken into consideration by them for the year 2018-19, it can be asserted that they will come up with true-up claims for 2016-17, 2017-18 and the year 2018-19 also at a latter period.</p> <p>This also indicates that the petitioner appears to have a conspicuous interest in deferring the costs and proposing it in the form of tariff hikes in future.</p> <p>Since the DISCOMs have not made it clear as to how they would propose to bridge the projected revenue gaps for the year 2018-19, we request the Hon'ble Commission to make it clear <i>that no true up claim would be permitted later for the revenue gap, if any, that is going to be determined by it after taking into account the subsidy amount the GoTS is willing to provide.</i></p>	
<p>3</p>	<p>2. ENERGY REQUIREMENT:</p> <p>Both the DISCOMs have shown an energy requirement of 64,291 MU - 42193 MU for SPDCL and 22098 MU for NPDCL - against the projected availability of 67,573 MU for the year 2018-19. They have shown a surplus of 3282 MU. Projections made by Telangana DISCOMs on availability and requirement of energy in MU year-wise are given below (in brackets, quantum approved by TSERC):</p>	<p>As per the Regulation No. 4 of 2005 read with first amendment regulation No. 1 of 2014, the Honble Commision has limited the agricultural sales to the Tariff Order approved quantities which resulted in lower power purchase quantities approved for True-ups.</p>

Year	Availability	Requirement	Purchases approved for true-up
2015-16	60,250(54,576.66)	52,100(48,550.97)	45,586.94
2016-17	64,669 (56,109.09)	54,884 (52,063)	46,843.05
2017-18	66,077.03 (58,357.73)	54,756 (52,245.39)	■

In the tariff order for 2015-16, TSERC observed that “based on the month wise energy requirement and energy availability, there is no requirement of energy from bilateral/short term purchases.” However, true-up approved for 2015-16 shows that the Commission has approved true-up of 10,503.58 MU against 12,429.12 MU claimed to have been purchased in the market by the DISCOMs.

Similarly, availability of 56,109.09 MU for the year 2016-17 approved by TSERC excluded market purchases. However, true-up approved for 2016-17 shows that the Commission has approved true-up of 2497.60 MU against 2837.43 MU claimed to have been purchased in the market by the DISCOMs.

The DISCOMs have not submitted their true-up claims for 2015-16 and 2016-17, along with ARR and tariff proposals for the year

	<p>2017-18, and relevant details of true up claims are not filed before the Hon'ble Commission. However, the Commission has considered the true-up/true-down claims of the DISCOMs provisionally in the tariff order for 2017-18.</p> <p>In the interests of the consumers we appeal to the Hon'ble Commission all information relating to true-up claims of the DISCOMs be made public and a public hearing be held on the same.</p> <p>The table shows that the availability and requirement of power have been inflated and actual purchases are even lesser. Going by this trend, the projected requirement of 64,291 MU for the year 2018-19 seems inflated, notwithstanding the claims of the DISCOMs for additional requirement of power for agriculture; lift irrigation schemes, metro rail project, etc., thereby showing availability of surplus at a much reduced level. When the DISCOMs had projected availability of 66,077.03 MU for the year 2017-18, how is it that they have projected 67,573 MU only for the year 2018-19 - an increase of just 1496 MU - despite projection of substantial addition of installed capacity of new projects during 2018-19?</p>	<p>BTPS Unit-I 270 MW & KTPS VII 800 MW have been considered to be commissioned during January, 2019 & October,2018 respectively.</p> <p>As these plants are coming up during the second half of the 2018-19, there is no significant increase in the energy availability.</p>
<p>4</p>	<p>1. ADDITIONAL SURCHARGE:</p> <p>The Licensees have submitted that the total stranded fixed cost obligation to the generating stations will be around Rs 492.29 crore corresponding to a backed down /open access sales of</p>	<p>Based on prudent planning and estimation of demand, the licensee has entered into power purchase contracts to ensure power supply to all categories of consumers without any load shedding. This is evident in the performance of TS Discoms as there has been no load</p>

	<p>2159.45 MU and have proposed to impose ‘additional surcharge’ of Rs. 2.06 per kWh.</p> <p>The petitioners have not furnished the requisite data viz. reasons for backing down during different intervals due to MoD, due to other variabilities in system, Open Access etc. and have simply attributed the back down to open access sales.</p> <p>The objector opposes the proposal of additional surcharge mainly on account of incorrect estimation of fixed charges liability. When seen from perspective of eligible power purchase sources, the DISCOMs may not be having any stranded capacity.</p>	<p>shedding since Nov 2014. From a supply perspective, generators insist on take or pay arrangements irrespective of off-take of power due to variations in demand. Hence in a scenario where there is lower off-take of power from discom due to sourcing of power through open access consumers, the licensee still has to bear the burden of fixed cost commitments.</p> <p>The Electricity Act 2003 and National Tariff Policy 2016, allow the discoms in levy of additional surcharge to recover the stranded cost of fixed assets as mentioned above.</p> <p>It may be noted that the licensee has followed the methodology outlined by the Hon’ble TSERC for computation of additional surcharge and the same has been submitted as part of the ARR and Tariff filings - 2018-19.</p>
<p>5</p>	<p>ENERGY SALES:</p> <p>In TSSPDCL, the metered sales reduced by 7.65% on actual basis in 2016-17 and agriculture sales increased by 6.06 %</p> <p>For 2017-18 also, the approved sales for agriculture sector is 6824.00 MU where as the projected sales in the ARR filing is shown as 9496.62 MU up by almost 40% than the approved sales. The same is expected in 2018-19 also. The Hon’ble Commission is requested to kindly ensure that the significant jump in the estimates of agriculture sales as submitted every year is representative of actual sales and not just statistical jugglery.</p>	<p>The total sales recorded in 2016-17 in TSSPDCL are 30844 MU against the approved sales of 32759 MU by TSERC in the Tariff order 2016-17. The reduction in sales is mainly due to increase in open access sales which are 2159 MU.</p> <p>The agriculture sales for the FY 2016-17 are 8767 MU against the tariff order approved sales of 6824 MU. The Licensee has projected 7643.74 MU of agriculture sales for FY 2017-18 in the ARR filings 2017-18. Whereas, Honble Commission has approved only 6824 MU for agriculture for FY 2017-18 similar to the approved value of 2016-17. The licensee has filed a review petition on Tariff Order 2017-18 to revise agl sales in view of the policy direction from the GoTS to provide 24 hours power supply to agriculture sector from January 1st 2018.</p> <p>The Licensee has projected 9496 MU of agriculture sales for FY 2017-</p>

		18 keeping in view of the 24 hrs power supply to agriculture from 1 st January 2018.
6	<p>3. POLICY SUGGESTIONS</p> <p>In keeping with the slogan of ' Bangaru Telangana ', the aspirations of all sections of Consumers have to be borne in mind in the context of falling rates of wind and solar energy, Surplus energy available in the State as well as the Country and the awards and accolades being received by the Leadership of the Electricity Sector of the new State.</p> <p>Some salient Policy issues:</p> <p>Before dwelling on the issue of current ARR, let us ponder on a few policy matters as the Country has been witness to major events like Demonetization and GST etc. in the recent past.</p> <p>It is common knowledge that all the Stakeholders in the Electricity Sector- the Generators, DISCOMs and the Consumers are beset with problems. Even though the Country has achieved Surplus condition and phenomenal improvement in Transmission and Distribution, the Generators are suffering from lack of sufficient Demand , falling PLFs and rising NPAs ; the Consumers with unaffordable Tariffs leading to falling Industrial Consumptions and DISCOMs with increasing Revenue Gaps despite periodical bale out packages.</p> <p>In the true spirit of the Electricity Act 2003, the Cross Subsidies ought to have been eliminated. It is time now for the incumbent</p>	<p>The licensee is completely aware on the need to improve the competitiveness of the manufacturing sector in the state. In order to meet this objective, TS Discoms have strived to supply 24 x 7 quality power. Capital Investments have also been made by discoms in order to meet this objective.</p> <p>The licensee has not increased cross subsidy and cross subsidy surcharge filing has been made as per the National Tariff Policy</p>

<p>Government to revisit this vital aspect mainly in the light of</p> <ol style="list-style-type: none"> 1. Committed Policy of encouraging the Manufacturing Sector to increase its share of contribution to GDP and also to provide greater Employment opportunities. (This is absolutely necessary to improve the competitiveness of the Indian Industry in the Global perspective mainly to confront the imports from China and other East Asian countries.) 2. In view of the State as well as the Country turning Power Surplus and is saddled with ever sliding PLFs of the thermal plants on one side and the falling tariffs of Wind and Solar Energy . 3. It is inevitable to encourage Demand Pushing by providing affordable Tariffs bereft of Cross Subsidies etc. to substantially increase Consumption so that the PLFs may improve to restore financial wellbeing of the Power Sector and also help mitigating the NPA issues. <p>Hence in place of or in addition to the Power Subsidies provided, it is rational to make Power available for all Industries at affordable rates by eliminating cross subsidies which is the need of the hour along with bringing Electricity under GST at an early date as envisaged.</p> <p>FTAPCCI on behalf of the Industrial fraternity would like to take this opportunity to appeal to both the Telangana Government and Hon'ble Commission to take a proactive role in ' ushering in true reform in Electricity Sector' by taking steps for Elimination of</p>	<p>In the process of encouraging the Renewable energy in Telangana, Solar capacity of 1978 MW has been installed in TSSPDCL area . They will generate the power during the day time only and being treated as must run stations. So, if the demand comes down then the Thermal stations have to be backed down. During the night time there will not be any generation from the solar plants and to meet the demand in night times mainly during peak hours there is a necessity to add sufficient capacity of Thermal stations also. So the PLFs of the thermal stations are coming down.</p>
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<p>Cross Subsidies in Retail Tariffs as well as Open access along with introduction of GST on Electricity. Such a measure will go a long way in making the Manufacturing Sector competitive as well as disentangle the Power Sector from the problems airing out of opaque Tariffs, Subsidies and the attendant financial problems necessitating periodical bale-outs.</p> <p>MYT Structure and the principles of Electricity Act 2003 have to be truthfully followed. Industry needs the term visibility to encourage it to take commensurate Investment decisions. Yearly Statements denies them of this opportunity and the State also will not be able to demonstrate its Commitment to the Manufacturing Sector like in its Industrial Policy.</p> <p>Need for maintaining the Regulatory Rigor:</p> <p>In the context of Telangana State joining the Central Government's UDAY Scheme in the recent past to improve the Working of the DISCOMs; it should be ensured that similar conditions do not repeat again in such a short time mainly with the burgeoning revenue gaps and unclaimed true ups of past years.</p> <p>Also on the Sales forecast, it appears that despite 24 hours supply to agriculture, the projected sales seem to be grossly under estimated while Industrial Consumption seems to be highly optimistic. Hence proper due diligence is required to be applied by</p>	<p>As per the Telangana State Government Policy to supply 24hrs power to Agriculture from January 1st, 2018, the consumption for the period Jan-March 2018 and for the entire year of 2018-19 is projected considering the growth of 33.36%.</p>
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Hon'ble Commission for arriving at a pragmatic Sales Forecast.

Computation of growth in Consumption in Units/KVA because of implementation of 24 hrs power supply to Agriculture

Circle	Avg consumption of Jul-Aug'16 (Units/KVA)	Avg consumption of Jul-Aug'17 (Units/KVA)	Growth % Jul-Aug 2017/2016
Nalgonda	103.81	123.95	19.40%
Medak	98.75	115.46	16.92%
Siddipet	97.96	160.41	63.76%
Average Growth in Consumption in Units/KVA with 24hrs power to Agriculture			33.36%

The total agriculture consumption under TSSPDCL for the year 2018-19 is projected as 12,285 MUs based on the above methodology.

However, the total projected consumption for Agriculture is reduced because of the following reasons:

- The entire estimated total DTR capacity for H2 2017-18 and 2018-19 is considered for projecting the consumption. However, in reality, the new connections will be released in a phased manner over months.
- An Additional sale of 941.92 MUs for LI Schemes is projected for the year 2018-19 under TSSPDCL. This will reduce burden on Agriculture pump sets to an extent.
- Telangana State Government is campaigning for removal of auto starters for the pump sets. This will avoid wastage of water and electricity.

With the implementation of 24 hrs power supply to Agriculture, the farmers can pump water at any time of the day at their comfort.

Because of this, it is expected that they will judiciously pump water

<p>On the Generation front, TSGENCO is proposed to operate at 70% PLF while CERC guidelines stipulate a normative PLF of 85% for fixed cost computation . Hon'ble Commission may please ensure this to save consumers from levy of higher fixed costs.</p> <p>The Maximum Demand of the Agricultural Load is season specific and time of day dependent and is varying from 70% to 30% . Given the magnitude of the load, it may cause further backdowns and consequent levy of fixed cost burden on consumers.</p> <p>Hon'ble Commission should also ensure that commensurate subsidy is provided by GOTS to meet the Revenue Gap in the current year and should keep a meticulous watch on the agricultural consumption in light of 24 hours supply.</p> <p>The above becomes all the more pertinent in view of the State Government's commitment in the UDAY Memorandum of Understanding wherein in page 5, vide point no. 1.2 p - it is stated that ' The Government of Telangana will examine the Tariff issue after the ARR is filed and the deficit will be met either by increase in Subsidy support or by increase in Tariffs.'</p> <p>In the present instance, as the Government has not preferred any Tariff increase , it goes without saying that GOTS needs to provide the full compliment of the required Subsidy to make up for the revenue gap.</p>	<p>only as per their requirement resulting in lower consumption of electricity</p> <p>As per the GoTS policy, the licensee has considered 24 hrs supply to agriculture from Jan 2018. This would result in higher demand during the day time and low demand during the night time. Across India, the PLFs of thermal power plants have seen a drop due to increased penetration of renewables in the grid. The installed capacity of solar power in Telangana is amongst the highest in the country, further the 24 hrs day time to agricultural consumers could lead to increased usage of power during day time. These factors could lead to drop in the actual dispatch of power from the normative levels</p> <p>Currently, RSF formats of TSERC recognized monthly energy availability and dispatch. This is different from power demand and supply. Due to low loads in night time, PLF (based on actual dispatch) will be lesser than 80%. Licensees have projected 70% PLF (not MW availability) for running MOD at month level. However, payments to the generator are being done based actual availability during the year.</p> <p>The deficit for the FY 2018-19 has to be bridged through suitable support from GoTS after scrutiny of the deficit by the Hon'ble TSERC.</p>
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The following specific points need to be addressed in current year's ARR for improving the Manufacturing Sector in the State.:

Disproportionately high Demand Charges have adversely affected the SMEs, mainly those operating on single shifts or low load factor. In times when Manufacturing Sector by and large is in doldrums, increased burden of unproductive fixed costs has become a curse. They should be rolled back to promote 'ease of doing business'. The very premise of transferring Fixed costs of Generators/ DISCOMs to Consumers in to-to is fallacious and misplaced as business models vary with different operating conditions of individual businesses.

The difference in Tariffs of 132 KV and 33 KV Consumers at 50 paise is glaringly high. In most other states like Gujarat, Madhya Pradesh, Chattisgarh, Karnataka etc, the difference is marginal and mostly less than 10 paise.

Hence to facilitate growth of 33 KV Consumption in the present context of need for increased Industrial consumption levels to offset the Surplus and also the need to provide the basic inputs to Industry at an affordable cost to make our Manufacturing Sector more competitive globally, specially the Power Intensive Sectors, this anomaly has to be corrected and parity maintained.

The tariffs for Industrial consumers of Karnataka and Madhya Pradesh is give below

Voltage	Telangana		MadhyaPradesh		Karnataka	
	Fixed (Rs. month)	Energy Rs. /unit	Fixed (Rs. month)	Energy Rs. /unit	Fixed (Rs. month)	Energy Rs. /unit
-11 kv	390 /kvA	6.65	330 /kVA	6.60	210/KVA	For first 1 lakh units-Rs 6.65
-33 kv		6.15	510 /kVA	6.50	210/kVA	Balance units-Rs 6.95
-132 kv		5.65	610 /kVA	6.05		

It can be observed from the above that even though the variation in tariffs at different voltages in Madhya Pradesh and Karnataka is more than that in Telangana, the tariffs at 132 KV level is almost same in

<p>Load Factor Incentive: should be provided (on the lines of many States like Madhya Pradesh , Chattisgarh etc.) to encourage Consumers with higher loads so that it may result in increased sales , higher PLFs for thermal Plants for welfare of all stakeholders.</p> <p>Interest on Delayed Payments and installments granted for Payment of CC bills or ACD at 18% is exorbitant . In view of the falling interest rates, it should be brought down suitably. Further As against the penal interest levied on delayed payments, concessional interest should be charged on sanctioned installments to make it easier for the consumer already in distress in line with the commitment of the Governments to ' Ease of Doing Business '.</p> <p>B.G. For ACD : Bank Guaranty should also be accepted in place of complete Cash deposits towards additional Consumption deposits</p>	<p>three states. Further it is also to be observed that the tariffs at 11 KV and 33 KV voltage levels in those states is very much higher than those in Telangana as the difference in tariffs are smaller when compared to 132 KV level tariffs.</p> <p>The tariffs in a state will depend on its socio economic factors, prioritisations policies, etc. the tariffs in one state can not be compared with the tariffs in other state.</p> <p>As there is no increase in tariffs for the year 2017-18 & 2018-19, the extension of further incentives is not possible.</p> <p>DPS will, be levied only on those consumers who are defaulted in payment of c.c charges within the due date. This is being levied as per the conditions provided in the Tariff order . It is the responsibility of the consumer to pay the bill in time and not fair on part of the objector to seek reduction in DPS.</p> <p>As per the claus 4(2) of (Security Deposit)Regulation 6 of 2004 of APERC, the HT consumer shall at all times maintain with Licensee an amount equivalent to consumption charges (demand charges and energy charges) of two months as security during the period of</p>
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<p>. To begin with at least one month's Consumption may be accepted in B.G. form Consumers whose monthly bills exceed Rs.10,00,000/-.</p> <p>Advance Payment Rebate: Rebate of 0.5% is offered for advance Payment like in some other states.</p> <p>Online Payment Rebate : 0.25% incentive should be offered for online Payments to encourage digital transactions.</p>	<p>agreement of supply. As per clause 4(5) of (Security Deposit)Regulation 6 of 2004 of APERC, the amount payable towards security shall be in the form of cash/Demand Draft drawn in favour of the Licensee. As per the above clause of the Regulations, the Licensee is collecting of two months consumption charges in cash/DD towards the security deposit from all the consumers. Hence, TSSPDCL disagree with the proposal of the objector to accept the Bank Guarantee in place of cash.</p> <p>The proposal for incentives for advance payments will be submitted for next financial year after studying such practices in other state DISCOMs</p>
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S.No.	Summary of Objections / Suggestions	Response of the Licensee
45.P. Chandrakanth Sharma, Management Consultant & Advocate (National Institute of Technology (Warangal)Ex Chief General Manager (HRD), Singareni Collieries company Ltd. A.P, Cell.No: 86885 36900, 93900 36900.		
1	<p>The phrase ARR (Additional Revenue Requirement) conveys unfair meaning. It is not found the standard terminology of ICAI, ICWA or ICS why not we use the following method</p> <p>Sale price – Operating Cost = Surplus (+) or deficit (-)</p> <p>The TSERC can direct Discoms as per the section 62(5) of the electricity Act 2003. Guidelines for payment of subsidy, if any,, by the state govt. are given in section 65 of the electricity act 2003.</p>	<p>Sec. 62(5) of the Electricity Act, 2003 states that “<i>The Commission may require a licensee or a generating company to comply with such procedures as may be specified for calculating the expected revenues from the tariff and charges which he or it is permitted to recover.</i>”</p> <p>Accordingly, the Honble Commission has framed the (Terms and Conditions for Determination of Tariff for Wheeling and Retail Sale of Electricity) Regulation, 2005 to determine the Aggregate Revenue Requirement (ARR)/Expected Revenue from Charges (ERC) of the Distribution and Retail Supply Licensees.</p> <p>Clause 2(2) of the above said regulation has defined “Aggregate Revenue Requirement” as the revenue required to meet the costs pertaining to the licensed business, for a financial year, which would be permitted to be recovered through tariffs and charges by the Commission.</p>
2	<p>Efficiency and performance (section 61e of the electricity Act 2003)</p> <p>e)the principles rewarding efficiency in performance.</p> <p>There can be reward (incentive) schemes to those who are successful in achieving cost reduction. Such schemes should be limited to outcomes but not to inputs like attendance, material supply etc.</p>	<p>The Honble Commission will stipulate Capital Investment Plan, Distribution Loss Trajectories and fix norms to the Operation & Maintenance costs through Regulations & Tariff Orders which shall be adhered by the DISCOMs.</p> <p>Any deviations from the stipulated norms will be allowed only after prudence check by the Honble Commission.</p>
3	<p>Energy Cost</p> <p>11.01 Now elec. energy cost is a significant component Entrepreneurs want to have competitive advantage. The surcharge</p>	<p>The levy of Cross Subsidy Surcharge and Additional Surcharge is in accordance to the provisions of the Electricity Act, 2003. The Licensee has requested the Honble Commission in its ARR Petition to</p>

	<p>needs a through review or announce time frame to phase out.</p> <p>11.02 Kindly fix the datum level for domestic charges to prevent misuse or corruption. Better to introduce incentive scheme for energy savers. There can be favouritism and corruption to include some connection in the group LT '1A'</p> <p>11.03 Prior to using the electrical pumps, farmers were using bullocks to raise water for fields in 4 to 8 hours in a day. There is scope for energy wastage in the 24-hours supply. Hence some steps are needed to control wastages in 24 hours supply. Some benefits or incentive scheme can be introduced for formers fixing meters for their pumps sets.</p> <p>11.04 T&D losses of TSTransco have to come down further by at least 1% They should be limited to 11% during 2018-19.</p>	<p>notify a roadmap/ methodology for reduction of cross subsidy across the consumer categories</p> <p>The tariffs for LT-I Domestic category is on telescopic basis. As the consumer mix in this category covers Below Poverty Line to Elite consumers, the telescopic basis of slab systems has been introduced to balance the interests of different consumers. Further, the fixation of higher tariffs as the consumption moves to higher slabs will act as a deterrent to Energy wastage. The categorization of the consumers and energy billing is being done based on the units of consumption in the billing month and the Tariff Order as approved by the Honble Commission.</p> <p>The Licensee is taking measures for bringing awareness among the farmers with regard to wastage of energy in view of 24hrs supply through newspapers & media. Special drive is being conducted for removing the Automatic Starters available at the agricultural pumpsets in order to control the wastage of energy.</p> <p>The Distribution Losses for FY2016-17 are 12.45% and reduced compared to previous year loss of 12.65%. It is expected to reduce the losses further by reduction of technical and commercial losses by vigorously conducting 11kV feeder wise energy audits around 1955 Nos feeders in the company. The DISCOM is putting all efforts to reduce its losses and reach the targets set by the Honble Commission.</p>
<p>12</p>	<p>For improvement of performance and reducing losses two exercise are needed.</p> <p>i) Energy audit by certified energy auditors</p> <p>ii) Action plan by any management consultants,</p>	<p>The DISCOM has a dedicated Energy Audit Wing which shall perform feeder wise energy audit and determine the Distribution losses. Further the following measures taken up by the Licensee for reduction of T&D losses.</p> <p><u>Technical loss reduction measures:</u></p> <p>Load balancing of DTRs and feeder,</p>

<p>some names are suggested below</p> <p>Energy audit:- Any consultancy firm having certified energy auditors on roll.</p> <p>For action plan any of the following four to be contacted.</p> <ul style="list-style-type: none"> i) National productivity council, New Delhi ii) NITIE (Institute of Industrial Energy's Mumbai) iii) Consultancy firms approved by the power finance corporation New Delhi. iv) Indian Institution of Industrial Engineers' Mumbai. 	<p>Providing additional DTRs</p> <p>Providing multiple CKTs to DTRs</p> <p>Bifurcation of Over loaded Feeders</p> <p>Replacing of Conductor with higher cross section</p> <p>Implementing HVDS in rural and Agl network</p> <p>Reactive compensation by installing Capacitor banks.</p> <p><u>Commercial loss reduction measures:</u></p> <p>Sealing of services</p> <p>Providing High accuracy meters(Electronic)</p> <p>Shifting of meters to outside</p> <p>Replacing concealed wiring with open wiring</p> <p>Providing AB cable in theft prone areas</p> <p>Frequent intensive inspections</p> <p>Frequent check readings of services</p>
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S.No.	Summary of Objections / Suggestions	Response of the Licensee
46. BSNL Sr. Chief Engineer (E) BSNL Electrical Zone, 6th floor, BSNL Bhavan Adarsh Nagar, Hyderabad-500 063		
1	<p>The Telephone Exchanges/Admin Buildings of BSNL are classified under LT-II B Non-Domestic/commercial) & HT-II (others) categories for LT and HT services connections respectively.</p> <p>In this connection, the following few points are submitted for your kind considered:-</p> <p>BSNL is a public Limited fully owned by Govt. of India, formed on 1/10/2000 by corporatization of erstwhile Department of Telecom services.</p> <p>Department of Telecom services (DTS)/Department of Telecom Operations (DTO) is an industry under ID Act.</p> <p>Section 2 (j) of Industrial Disputes Act 1947 gives the definition for Industry is as under:</p> <p>“Industry means any systematic activity carried on by co-operation between any empower and his workmen for the production, supply or distribution of goods or services with a view to satisfy human wants or wishes, whether or not any capital has been vested in for the purpose of carrying on such activity; or such activity is carried on with a motive to mke any gain or profit.</p> <p>Therefore BSNL formed by corporatization of DTS/DTO, also comes within the purview of Industry as defined under the act.</p> <p>Finance act 2002 has accorded the status of industrial undertaking to the Telecommunication service providers w.e.f 01/04/2003, by insertion of Sub Clause III (a) after sub clause (iii) in clause (aa) of subsection (7) of Section 72 A. accordingly, “industrial Undertaking “means any undertaking which is engaged in.</p> <p>i) The manufacture or processing of goods; or ii) The manufacture of computer software; or iii) The business of generation or distribution of electricity or</p>	<p>The Categorisation of activity is based on definitions & Terms and conditions as stipulated in the Tariff Order.</p> <p>As per the Electricity Act, 2003 <i>“The Appropriate Commission shall not, while determining the tariff under this Act, show undue preference to any consumer of electricity but may differentiate according to the consumer's load factor, power factor, voltage, total consumption of electricity during any specified period or the time at which the supply is required or the geographical position of any area, the nature of supply and the purpose for which the supply is required.”</i></p> <p>In accordance to the Honble Commission’s Tariff Order, the HT-I Industry is applicable for supply to all HT consumers using electricity for industrial purpose. Industrial purpose shall mean manufacturing, processing and/or preserving goods for sale, ...</p> <p>Hence as there is no manufacturing/processing activity is involved in Telephone exchange services it cannot be categorized under HT-I/LT-III Industrial.</p>

	<p>any other form of power; or</p> <p>a. The Business of providing telecommunication services whether basic or cellular including radio paging, domestic satellite service, network of trunking, broadband network and internet services or</p> <p>iv) Mining; or</p> <p>v) The construction of ships, aircrafts or railsystems.</p>													
	<p>As per the schedule of Retail Supply Tariff for the year 2016-17 issued by Telangana State Electricity Board, the following categories of tariff come into effect for BSNL installations.</p> <table border="1" data-bbox="325 704 1373 821"> <thead> <tr> <th>Particulars</th> <th>Tariff</th> </tr> </thead> <tbody> <tr> <td>Demand charge (Rs./kW per month)</td> <td>60.00</td> </tr> <tr> <td>Energy Charges (Rs.Per unit)</td> <td>10.00</td> </tr> </tbody> </table> <p>HT-II: (Others) Category for HT Service Connections</p> <table border="1" data-bbox="325 894 1373 1045"> <thead> <tr> <th>Particulars</th> <th>Tariff</th> </tr> </thead> <tbody> <tr> <td>Demand charge (Rs./kW per month)</td> <td>390.00</td> </tr> <tr> <td>Energy Charges (Rs.Per unit)</td> <td>7.80</td> </tr> </tbody> </table> <p>Generally, the higher tariff mentioned above shall be imposed on the high-end consumer groups such as shops, Business Houses, Hotels, restaurants, Clubs Theatres, etc with an intention to provide more cross subsidy for other weaker sections of consumers. Unfortunately, Telephone exchanges of BSNL are also categorized along with the businesses groups. It may not be out of place to say that BSNL contributes for the social cause of providing telecom infrastructure to the country including rural area, far flung villages, high lands and interior locations. BSNL is serving the nation, by doing a business which is entirely different from that of</p>	Particulars	Tariff	Demand charge (Rs./kW per month)	60.00	Energy Charges (Rs.Per unit)	10.00	Particulars	Tariff	Demand charge (Rs./kW per month)	390.00	Energy Charges (Rs.Per unit)	7.80	<p>As per the Tariff Order, any consumer who does not fall in any other LT category i.e., LT-I, LT-III to LT-VIII categories will be categorized under LT-II Non-Domestic/Commercial. Similarly, all HT Consumers other than those covered under HT Categories I and III to VII will be categorized under HT-II Others.</p>
Particulars	Tariff													
Demand charge (Rs./kW per month)	60.00													
Energy Charges (Rs.Per unit)	10.00													
Particulars	Tariff													
Demand charge (Rs./kW per month)	390.00													
Energy Charges (Rs.Per unit)	7.80													

	<p>the above mentioned high end group. Telephone connections are being provided in rural areas at highly subsidized rates and in turn BSNL incurs huge operational cost in this sector. Thus BSNL is already providing cross subsidy for weaker sections in th community. It is not fair to impose more burden on BSNL in the form of higher energy tariff, by making BSNL alos one among the high-end consumer group.</p>	
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S.No.	Summary of Objections / Suggestions	Response of the Licensee
47.	M. Sridhar Reddy, H.No. 2-1-174 & 175, Rajput Residency, Nallakunta, Hyderabad-500 044 Cell.No. 9866381090.	
i	<p>తెలంగాణ రాష్ట్రంలోని చాలా ప్రాంతాలు మెట్ట ప్రాంతాలుగా ఉండి భూగర్భ జలాల కొరత తీవ్రంగా ఉంది. భూగర్భ జలాల కొరత కారణంగా 3 ఫేస్ మోటార్లకు సరిపడినంత జలం అందుబాటులో లేక వారికి అందుబాటులో ఉన్న కొద్దీ నీటిని సింగల్ ఫేస్ మోటార్లు ఉపయోగించి వాడుకోవడానికి అవకాశముంది. కానీ గతంలో 7గంటల వ్యవసాయ విద్యుత్ సరఫరా జరిగినప్పుడు సింగల్ ఫేస్ విద్యుత్ వాడకూడదని నియంత్రించారు. కానీ ప్రస్తుత పరిస్థితిలో 24గంటల విద్యుత్ సరఫరా జరుగుతున్నప్పుడు సింగల్ ఫేస్ విద్యుత్ వాడకూడదనే నిర్ణయం అర్థరహితం ఆగుతుంది. రైతాంగానికి ఇబ్బంది కూడా అవుతుంది. సింగల్ ఫేస్ విద్యుత్ మోటార్ల వల్ల విద్యుత్ ఆదా అవుతుంది. నీటి లభ్యత లేని ప్రాంతాలలో 3 ఫేస్ మోటార్ల వల్ల చాలా ఇబ్బందులు అవుతున్నవి. కావున సింగల్ ఫేస్ మోటార్లను వాడడానికి అధికారికంగా అనుమతించాలని కమిషన్ వారిని ప్రదించుచున్నాను.</p>	<p>సింగల్ ఫేస్ మోటార్లతో ఎక్కువ లోతులో ఉన్న నీటిని పంప్ చేయడం కష్టతరం మరియు మోటార్లు కాలిపోయే అవకాశము ఎక్కువ. సాంకేతిక అంశాలు పరిశీలించుచో 3-ఫేస్ మోటారు సెల్ఫ్ స్టార్టింగ్ శక్తి గలది మరియు గ్రిడ్ పై లోడు సమతుల్యం వేయగలవు.</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
48. K. Krishna Reddy, Netaji Road, Jedcherla, Mahabubnagar. Cell.No. 9885752784.		
i	DTRలు కాలిపోయినప్పుడు రైతులే సొంతంగా కిరాయి వాహనాలలో తెచ్చినప్పుడు, వాహనానికి కిరాయిలు మీరు మహబూబ్ నగర్ జిల్లాలో ఎంత మందికి ఇచ్చారు, ఇవ్వమని ERC వారు మీకు ఆదేశించరా.	కాలిన DTR ను ఒక వెళ రైతు సొంతంగా కిరాయి వాహనంలో తెచ్చినప్పుడు సొంత మండలం ఐతే రూ .750 /- మరియు ఇతర మండలం నుండి తెచ్చినట్లైతే రూ .1000 /- ల చొప్పున TSSPDCL ఇస్తుంది.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
49.	Malla Reddy BKS, Kottagadi village, Vikarabad Mandal, Vikarabad District Cell.No. 9505502440	
	<p>18004253600 ఫోన్ చేసి సమస్య చెప్పిన తర్వాత SOP సమయం పూర్తి అయిన తర్వాత పని కాకపోతే మేము ఏమి చేయాలి? మీరు ఏమి చర్య తీసుకున్నారు పని కాని దగ్గర వికారాబాద్ జిల్లాలో వివరాలు ఇవ్వగలరు.</p>	<p>విద్యుత్ టోల్ పై నంబరు 18004253600 24 గంటలు పనిచేస్తుంది. , 48 గంటలలోనే సమస్యకు పని కానప్పుడు సంబంధిత DE గారికి మీ సమస్యను తెలియచేయగలరు లేనిచో CGRF కు ఫిర్యాదు చేసికొన వచ్చు.</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
50.	Indian Energy Exchange Limited, Corporate Office: Unit No. 3,4,5&6, Plot No.7, Fourth Floor, TdI Centre, District Centre, Jasola, New Delhi - 110025 Tel: +91-11-4300 4000	
i	<p>Maintainability of the Petition:</p> <p>1.1 <u>Additional Surcharge cannot be based on Future Projections</u></p> <p>1. The Petitioners have invoked Para 8.5.4 of National tariff Policy (NTP) which inter-alia provides that additional surcharge becomes applicable in case existing long-term PPAs has been and continues to be stranded. Para 8.5.4 of NTP is reproduced below:</p> <p>“The additional surcharge for obligation to supply as per section 42(4) of the Act should become applicable only if it is conclusively demonstrated that the obligation of a licensee, in terms of existing power purchase commitments has been and continues to be stranded, or there is an unavoidable obligation and incidence to bear fixed costs consequent to such a contract. The fixed costs related to network assets would be recovered through wheeling charges.</p> <p>2. In wake of the above set position in the NTP, the words ‘has been’ mandates that Additional surcharge becomes applicable only in case where losses have already been incurred by the Discom on account of Open Access availed by consumers. However, the additional surcharge cannot be imposed in anticipation of the capacity becoming stranded.</p> <p>3. Further, the petitioner while anticipating the need for Additional Surcharge has also anticipated that the State would be in power surplus in FY 18-19 therefore as such in the past period Discoms has not claimed that it has</p>	<p>The Discoms have projected availabilities of all Generating stations for FY 2018-19 and at the state level the projected availability is 67,573 MU. The licensees are expecting the open access sales at the same level as in 2017-18 for FY 2018-19 also. The additional surcharge for FY 2018-19 is calculated based on the stranded capacity limiting to open access sales.</p>

	<p>incurred any losses on account of Open Access.</p> <p>4. It is submitted that the methodology for determination of Additional Surcharge adopted by the other State Electricity Regulatory Commissions viz., Haryana Rajasthan, Gujarat, Maharashtra etc is based on the fixed cost related expenses actually incurred by the Discoms in the past period. While claiming the Additional Surcharge, the Petitioner has not claimed any loss in the past period.</p>	
	<p><u>1.2 Conclusive demonstration of stranding of Long-term generation capacity is pre-requisite to determination of additional surcharge.</u></p> <p>1. Para 8.5.4 of NTP provides that Additional Surcharge is applicable only when capacity continues to be stranded. The continuous period for which certain capacity has been stranded due to Open Access should be constructed as the period for which Additional Surcharge is claimed by the Petitioners.</p> <p>In the present case since the period is financial year FY 18-19 therefore the Additional Surcharge can be claimed once the financial year has concluded and the Discoms have conclusively demonstrated that there was no power shortage in any of the 15 min time block of FY 18-19 and the capacity was stranded/backed down primarily on account of Open Access.</p> <p>In other words Additional Surcharge can be claimed only when Discom is able to meet its peak demand in FY 18-19 and does not do any load shedding during such peak demand period.</p>	<p>Additional surcharge for the FY 2018-19 is determined based on the stranded capacity limiting to projected open access sales of 2159 MU for the FY 2018-19, which is very much less than the back down energy of 3,666 MU in the state for FY 2017-18 till October, 2017.</p>

	<p>2. Further, the petitioner has also not been able to demonstrate continuous standed capacity as per above mentioned principle. In fact, as per the petition the estimated bilateral purchases from various Traders/Generators on Short Term basis are estimated to be 1876.48 MU for FY 2018-19 upto 15.04.2018.</p>	
<p>ii</p>	<p>2. Other Submissions: without prejudice to above submissions, following comments are submitted for consideration of the Hon'ble Commission: 2.1 <u>Discom have not incurred any loss but have actually made savings by permitting Open Access:</u></p> <p>1. It is submitted that when the open access consumer procures power from sources other than incumbent distribution licensee, the distribution licensee avoids procuring power in merit order i.e., highest variable cost generation is avoided first than the second highest variable cost generation on so on.</p> <p>In case of Telangana, the average power purchase cost (variable Cost) of Discoms is ~2.54 Rs./Unit. Therefore when Discoms avoid procurement of any generation whose variable cost of generation from some APGENCO plants, TS GENCO plants NLC plants is more than the 2.19 Rs./Unit and by backing down of these sources, the Discoms can make substantial savings.</p> <p>2.2 <u>Data Insufficiency:</u></p> <p>The Petitioner has claimed additional surcharge simply based on the average peak demand of state met and total fixed cost which does not reflect that in a given time block when open access consumer was Procuring power</p>	<p>When the consumer opts for open access, the licensee has to back down the generation due to decrease in demand and the licensee has to pay the fixed cost to the generator, but not the variable cost. The licensee is claiming this stranded fixed cost from the open access consumers in the form of additional surcharge.</p> <p>Discoms have considered the stranded cost due to open access asles only to calculate the additional surcharge.</p>

through open access. Discoms had stranded capacity and had to back down certain generating station in that timeblock. There is no rationale in the methodology proposed by the Discoms.

2.3 **Incorrect Calculation of Additional Surcharge by Licensee:**

1. Calculation of stranded cost due to Open access: The Licensee has calculated stranded cost due to Open Access in following manner:

- The approved fixed charges payable to generators as per projections for FY 2018-19 is Rs. 15,317 Crores and projected available capacity is 7,670.04 MW. Thus, the average fixed charges worked out to Rs. 2.00 Crores per MW.
- The Licensee has then considered the Projected Open Access sales for FY 2018-19 for arriving at the stranded generation capacity which is 246.51 MW.
- Accordingly the fixed charges for stranded capacity of 246.51 MW works out as Rs. 492.29 crores (i.e., 246.51 MW x 2.00 crores)

The above methodology has following gaps:

- Since average fixed cost payable to generators has been considered, it does not reflect which specific generator was backed down due to Open Access which is the basic philosophy behind the Additional Surcharge that only such fixed cost of generators can be imposed as Additional Surcharge which is stranded due to Open Access.
- Licensee has projected 246.51 MW as the capacity

Honble Commission in its additional surcharge order for FY 2017-18 has considered the average fixed cost per MW based on the total fixed charges and the long term availability in MW. Open access capacity in MW also arrived based on the open access quantum in MU over the period. The same principle is adopted for arriving the Fixed cost per MW and Open access capacity in MW in the filings submitted by the Discoms.

As per section 42(4) of Electricity Act, 2003 the State Regulatory Commission may specify the additional surcharge to be levied on the open access consumers to enable the licensee to recover its fixed costs arising out of its obligation to supply.

Further as per Clause 8.5.4 of Tariff Policy, : *“The additional surcharge for obligation to supply as per section 42(4) of the Act should become applicable only if it is conclusively demonstrated that the obligation of a licensee, in terms of existing power purchase commitments, has been and continues to be stranded, or there is an*

	<p>which would be stranded due to Open Access. It is incorrect to average out the Open Access quantum as it cannot be presumed that in each time block of 15 minute in entire year, there will be a fix MW which will be stranded due to Open Access.</p> <p>2. Cost considered for Additional Surcharge: The Licensee has considered following cost towards additional surcharge:</p> <ul style="list-style-type: none"> • Fixed cost of stranded Power – 492.29 Rs. Crores • Demand charges – 303.29 Rs. Crores • T&D cost – 255.50 Rs. Crores • As to be recovered = $492.29 - 303.29 + 255.50 = 444.48$ Rs. Cr. <p>The above Methodology has following gaps:</p> <ul style="list-style-type: none"> • Transmission and Distribution cost are network cost. As per Para 8.5.4 of Tariff Policy 2016 notified by Government of India, the fixed costs related to network assets would be recovered through wheeling charges. Therefore, Network related cost cannot be recovered through Additional Surcharge. Hon'ble Supreme Court in Energy Watchdog Vs CERC in civil Appeal Nos. 5399-5400 of 2016 (Compensatory tariff case) held that the Tariff Policy is statutory documents being issued under section 3 of the Act and have the force of law. Therefore, Hon'ble commission is bound by the principles set out in Tariff Policy and should not consider any network related cost in determination of Additional Surcharge. • Therefore, in view of the above gaps in the methodology proposed by the Licensee. Hon'ble Commission is requested to adopt a rational methodology for calculation of Additional surcharge one of such methodology is suggested for 	<p><i>unavoidable obligation and incidence to bear fixed costs consequent to such a contract. The fixed costs related to network assets would be recovered through wheeling charges”.</i></p> <p>As per the above provisions, Licensee has considered the fixed cost stranded due to power purchase commitments and network charges in calculating the additional surcharge. However, the wheeling charges paid by the open access consumers has been deducted while calculating the additional surcharge</p> <p>Honble Commission has issued order on additional surcharge order for FY 2017-18 on December 13, 2017 clearly indicating the methodology and calculations for determination of additional surcharge. Honble Commission may issue a Regulation specifying the methodology for determination of additional surcharge.</p>
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consideration of the Hon'ble Commission in subsequent paragraphs.

2.4 Capping the Additional Surcharge

The licensees are proposing additional surcharge because of under recovery of fixed charges towards generations through Demand charges. Therefore, the Additional surcharge can be maximum to the extent of loss incurred by the Distribution Licensee when a consumer opts for Open Access. This cap can be calculated by following formulation:

Maximum Additional Surcharge = Average Fixed Cost of Generation – Demand Charges.

2.5 Suggested Methodology for Determination of Additional Surcharge levied from Open Access consumers

As discussed above, it is observed that there is scope of improvement in methodology adopted by the Hon'ble Commission for determination of Additional Surcharge.

Accordingly, we propose following methodology of determination of Additional Surcharge to rationalize the methodology based on the sound principles. Accordingly following methodology is proposed to rationalize determination of Additional surcharge.

- 1)** Para 8.5.4 of Tariff Policy provides that additional surcharge becomes applicable in case existing PPAs has been and continues to be stranded. It implied that additional

surcharge can only be imposed in case there was stranded capacity in the past period and it is likely that same would be continued in the present/future Surcharge should be calculated on the data of past period instead of future period. This practice has been adopted by all other state commission where additional surcharge is applicable.

2) Calculation of quantum of stranded power should be done looking at reason of breaking down for each fifteen – minute time block

3) The additional surcharge can only be levied in case discom has to back down the generation due to open access and the Discom is not able to recover fixed cost of such generations. To establish that the back down of generation has been done by Discoms due to open access. Following factors need be considered:

i. purchase of power under short term market: if Discoms is buying power under short term market than it may be fairly concluded that the Discom is in either shortage situation or it is backing down generation due to economic reason (high Cost). In both of this situation, there will not be any stranded capacity on account of Open Access, rather open access is helping Discoms in curbing shortages.

ii) Load Shedding: in case Discom is resorting to load shedding than again it can be inferred that Discom is in shortages thereby no stranded capacity can be claimed on account of Open access as it would be absurd that on one hand consumers are not getting power and on the other hand discoms are backing down generation.

iii) Purchase of RE Power Under RPO: Discoms are obligated to procure power from Re Source. In such case, Discom

smay hae toback downits conventional generation. In such scenario Open Access cannot be held responsible for backing down of generation.

iv. The assessment of Additional Surcharge should be carried out for each season. The period of 12 months in a financial year may be divided into two or more seasons based on shape of load curves. In case Discom is not able to meet peak demand of the season, no additional surcharge to be imposed.

v) The additional surcharge should be calculated based on actual parameters for the comparable past period and assumes that conditions would remain same for corresponding period next year. Eg. Apr-June for FY 16-17 is comparable with Apr-June of FY 17-18

4) Considering all of the above factors, assessment of quantum stranded power attributable to Open Access customers during each 15-Min timeblock of peak period of a season may be done as under:

$$SP = \text{Minimum} [(URS - STPP - REPO, OA)]$$

Where

Sp is stranded Power (MW) attributable to Open Access customers during the time block

URS is un-requisitioned Power (MW) during the time block from various Power Stations with which Discom has long-term PPA duly approved by the SERC

LS is the quantum (MW) of load shedding carried out or load restrictions imposed on various categories of consumers or areas during the time block

STPP is the Short Term Power Purchase (MW) during the time block

REP is the Renewable Energy Purchase (MW) during the time block against RPO

OA is the quantum of Open Access granted (MW) during the time block.

Load Shedding or load restrictions in the area of Discom and short term power purchase including renewable power are subtracted from the unrequisioned/back down power to arrive at actual stranded Power during the time block. By using minimum of stranded power and open access quantum, it is ensured that only the Power stranded because of Open Access consumers is used for assessment of Additional Surcharge.

Example:

Time Block	Plant A (MW)	Plant B (MW)	Plant C (MW)	Plant D (MW)	Total URS (MW)	
0.00-0.15	100	100	100	100	400	
0.15 - 0.30	200	200	200	200	800	

II. Calculation of Stranded Capacity due to Open Access in a time

Block

Time Block	OA Quantum (A)	URS (B)	LS (C)	STPP (D)	REP (E)	Stranded Power (SP) = B - C - D-E	Min of 'A' and 'SP' (MW)
0.00 - 0.15	500	400	50	100	20	230	230
	500	800	50	50	50	650	500

5) After assessment of total stranded power due to open Access in a time block, the resultant quantum (MW) should be allocated amongst the generation plants starting with low variable cost. In other words while allocating uantum, merit order should be followed. In the above example allocation of should be done in following manner:

iii. Allocation of stranded capacity

Time Block	Plant A	Plant B	Plant C	Plant D	Total Stranded Power (SP) (MW)
Variable Cost (Rs./Kwh)	3.12	3.36	3.44	3.85	

0.00 0.15	-	100	100	30	0	230
0.15 0.30	-	200	200	100	0	500

6) Assessment of fixed cost of stranded power due to Open Access should be calculated in following manner.

1) Calculation of fixed cost of each plant in Rs./Unit:

Fixed Cost (Cr. Rs.)	Z	350	210	380	126
Quantum approved Tariff Order (MU)	Y	7000	5250	8400	3500
Fixed Cost (Rs./Unit)	Z/ Y	0.5	0.4	0.45	0.36

2) Calculation of fixed cost of stranded power: In the above example total fixed cost should be calculated by multiplying stranded power from each plant in a time block with the fixed Cost (Rs./Unit) of such Plant

Time Block	<u>Plant A</u>	<u>Plant B</u>	<u>Plant C</u>	<u>Plant D</u>	<u>Total fixed cost of stranded Power</u>

					(Rs.)
Fixed Cost (Rs./Unit)		<u>0.4</u>	<u>0.45</u>	<u>0.36</u>	
<u>0.00 - 0.15</u>	<u>12500 (100*100*0.5/4)</u>	<u>10000</u>	<u>3375</u>	<u>0.00</u>	
<u>0.15 - 0.30</u>	<u>2500</u>	<u>20000</u>	<u>11250</u>	<u>0.00</u>	<u>56250</u>
Total					<u>82125</u>

3) Calculation of total recoverable Additional Surcharge:

The Recoverable Additional Surcharge should be arrived by adjusting revenue credited by generator (Rs) against sale of un-requisitioned Power

Recoverable Additional Surcharge (Rs.) (RAC) = Total Fixed cost of Stranded Power – revenue Credited by generator against sale of un-requisitioned Power.

Example

Lets assume that generator credited revenue @ Rs. 2125 realized from sale of Un-requisitioned power. Therefore,

$$\text{RAC} = 82125 - 2125 = 80000 \text{ Rs.}$$

4. Additional Surcharge to belevied on Open Access Consumers:

Additional Surcharge (Rs./Unit) = RAC/Open Access Quantum		
<u>In above example:</u>		
Open Access Quantum		
Time Block	OA Quantum (A) (MW)	OA Quantum (units) [A*1000/4]
0.00 – 0.15	500	
0.15 – 0.30	500	
	Total	250000

S.No.	Summary of Objections / Suggestions	Response of the Licensee
51. M Penta Reddy, Kasimcherla(Vi), Amdapur G.P, Moinabad (M), Ranga Reddy (Dist), Cell No: 9390084314		
i	<p>మా యొక్క ట్రాన్సుఫార్మర్ మీద ఓవర్ లోడ్ కారణంగా సంబంధిత అధికారులను (ADE) సంప్రదించగా వారు agl Estimate కాపీలు ADE గారు మాకు ఇచ్చి DE గారి దగ్గరకు వెళ్ళమని మాతో చెప్పి పంపినారు. తరువాత మేము DE గారి దగ్గరకు వెళ్ళగా మా దగ్గర ఉన్న Estimate కాపీలను తీసుకొని మా పై కోపంగా మాట్లాడి మీరు వెళ్ళండి నేను చూసుకుంటానని మమ్మల్ని పంపించినారు. తరువాత మరుసటి రోజు ADE గారిని మేము సంప్రదించగా ADE గారు మేము పోతే మాకు ఖర్చులు అవుతాయి కాబట్టి మిమ్మల్ని పంపినాము, నా పని అయిపోయింది మీరు ఏవైనా చేసుకోండి అని అంటున్నారు. ఈ యొక్క సమస్యపై తగిన చర్య తీసుకొని మాకు న్యాయం చేయగలరని మా యొక్క మనవి</p>	<p>100 kVA ట్రాన్స్ఫార్మర్ 11.12.2017 నాడు మంజూరు అయినది. దీనికి సంబంధించిన పని మెటీరియల్ ఎలాట్ మరియు వర్క్ ఆర్డర్ తీసుకున్న తరువాత పూర్తి చేయడం జరుగుతుంది.</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	<p>52. P Anji Reddy, H.No. 2-1-174 & 175 , Flat No. G-2, Rajputh Residency, Nallakunta, Hyderabad-500 044 53. J. Sri Ranga Ra H.No.2-2-18/18/7, Flat No. 503 C-29, D.D Colony Hyderabad - 500013 55. M. Sridhar Reddy, H.No. 2-1-174 & 175, Rajput Residency, Nallakunta, Hyderabad-500 044 Cell.No. 9866381090.</p>	
1.	<p>వ్యవసాయదారుల కొత్త సర్వీసుల కొరకు అర్జీ పెట్టుకున్నప్పుడు డిస్కం వారు సాంక్షన్ ఇచ్చి తత సంబంధిత మెటీరియల్ పూర్తిగా ఇవ్వకుండా కొంత సామానును రైతు వినియోగదారునే కొనుక్కోమని చెప్పన్నారు. రైతులు అట్టి సమానును కొనుక్కొంటున్నారు. స్తంభాలు (పోల్లు) పాతడానికి గుంతలు తవ్వకోవడం, డిస్కామ్ వారు ఇచ్చిన సామానును తమ స్వంత రవాణా ద్వారా తీసుకొచ్చుకోవడం వాటి ఎరెక్షన్ కూడా రైతులే స్వంతగా కొనుక్కోవడం జరుగుతుంది. ట్రాన్స్ ఫార్మర్ గద్దెను కూడా రైతులే నిర్మించుకోవడం జరుగుతుంది. వీటన్నిటికీ బిల్లులు కాంట్రాక్టర్లకు ఇస్తున్నారని స్వయాన ముఖ్యమంత్రి గారు గాజ్వెల్ లో చేసిన సమీక్ష సమావేశంలో సంబంధిత సర్పంచ్ లు ఆరోపించడం జరిగింది. అట్టి సమావేశంలో సంబంధిత ఉన్నతాధికారులు కూడా ఉన్నారు. అదే విషయాన్ని భారతీయ కిసాన్ సంఘ్ గత కొన్ని సంవత్సరాలుగా చెబుతూవస్తున్నది. దీనిని నివారించడానికి కొత్త సర్వీసుకు సంబంధించిన వినియోగదారునికి వారి సర్వీసును ఏర్పర్చడానికి పట్ట సామాను తమరు అందులో ఏ సామాను ఇస్తారు, వినియోగదారుడు ఏ ఏ సామాను కొనుగోలు చేసి తీసుకురావాలి. ట్రాన్స్ ఫార్మర్ దిమ్మెలు లాంటివి రైతు</p>	<p>వ్యవసాయ బోరు కనెక్షన్ కొరకు వినియోగదారుడు సంబంధిత CSCలో దరఖాస్తు చేసుకోవలెను. దరఖాస్తు నమోదు అయిన తరువాత వినియోగదారునికి SMS ద్వారా సమాచారం అందించబడుతుంది. దరఖాస్తు తేదీ మరియు సమయం ప్రకారంగా మండల వారిగా సీనియార్టీటీ లిస్టు తయారు చేయబడుతుంది. సీనియార్టీటీ లిస్టు ప్రకారంగా, సంబంధిత సెక్షన్ అధికారి పోలాన్ని సందర్శించి తగిన Estimateని ప్రతిపాదించడం జరుగుతుంది. Estimateమంజూరు అయిన తరువాత వినియోగదారునికి SMS ద్వారా సమాచారం అందుతుంది. కాంట్రాక్టర్ తో ఒప్పందం కుదిరిన తరువాత సీనియార్టీటీ లిస్ట్ ప్రకారంగా, సెక్షన్ అధికారి వర్క్ ఆర్డర్ ని తయారు చేసి అవసరమైన మెటీరియల్ ని స్టోర్ నుండి డ్రా చేస్తారు. మెటీరియల్ డ్రా చేయు సమాచారం కూడా వినియోగదారునికి SMSద్వారా పంపబడును.</p> <p>HT/LT లైన్ మరియు డిస్ట్రిబ్యూషన్ ట్రాన్స్ఫార్మర్ పనులకు , ఒక్కో పంపుసెట్టుకు రూ .70,000/- ల ఖర్చు TSSPDCL భరించును. డిస్ట్రిబ్యూషన్ ట్రాన్స్ఫార్మర్ లేకుండా LT లైన్ మాత్రమే ఉన్న సందర్భంలో, పంపు సెట్ కు రూ .40,000/- ఖర్చు TSSPDCL భరించును. Estimateకి అయే ఖర్చు పై చెప్పిన మొత్తాన్ని మించినచో, మిగిలిన మొత్తాన్ని వినియోగదారుడు భరించవలసి ఉంటుంది. కాబట్టి TSSPDCL అనుసరించే విధానం చాలా పారదర్శకంగా ఉంటుంది మరియు ప్రతి దశలో వినియోగదారుకు సమాచారం అందించబడుతుంది.</p>

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	<p>నిర్మించుకోవాలా లేక డిస్కం నిర్మిస్తుండగా, పోల్ పాతే గుంతలు ఎవరు తవ్వాలి, పోల్స్ ట్రాన్స్ పోర్ట్ చేస్తూ రైతు వినియోగదారులు గాయపడ్డ, చనిపోయిన సందర్భాలు కూడా గతంలో తమరి దృష్టికి తీసుకువచ్చినాము. దాని పై చర్యలు తీసుకున్న వివరాలు తెలియజేయాలి. ప్రతి వినియోగదారునికి సాంక్షన్ కాపీతో పాటు సాంక్షన్ ఐన మెటీరియల్ మరియు చేయబోయే సేవలను ఉత్తరం ద్వారా తెలియజేయాలి. సర్వీసు రిలీజు అయిన తర్వాత ఎంత సామాను అయినా మెటీరియల్ మరియు చేయబోయే సేవలను ఉత్తరం ద్వారా వినియోగదారునికి తెలియజేయాలి. ప్రభుత్వం/డిస్కం వినియోగదారుని కొరకు ఖర్చు చేసిన అర్థం ఐ వినియోగదారులు ప్రభుత్వానికి / డిస్కామ్ లకు (లాయల్) కృతజ్ఞతగా ఉంటారు. దీని వల్ల డిస్కం కొనుగోలు చేసిన సామాను వృధా మరియు దుర్వినియోగం కాకుండా ఉండే అవకాశం ఉంది. ఎ.పి.ఎస్.ఇ.బి. కాలం నాటి విధానాలనే పాటించడం ద్వారా నష్టాలు అధికమయ్యే అవకాశం కూడా ఉంది.</p>	
2.	<p>రెండు డిస్కామ్ లకు సంబంధించిన టోల్ ఫ్రీ 18004253600 మరియు 18004250028 నెంబర్ ల ప్రచారము చేయడం లేదు. ప్రతి ట్రాన్స్ ఫార్మర్ పైన మరియు ప్రతి గ్రామంలో బిల్ కలెక్షన్ చేసే స్థలం వద్ద వ్రాయించే ఏర్పాటు చేయాలి. బిల్ కు వెనుక కూడా ప్రింట్ చేయాలి. విద్యుత్ నియంత్రక విఫలం చెంది సరఫరాలో అంతరాయం చెందినప్పుడు టోల్ ఫ్రీ నెంబర్ ద్వారా ఫిర్యాదు వచ్చేటట్లుగా</p>	<p>మీ ఆలోచన ఆహ్వానించతగినది. దీనిపై ఆలోచన చేసి సరైన నిర్ణయం ప్రకటిస్తాము.</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	ప్రయత్నించి ప్రతి ఫిర్యాదుకు ఫిర్యాదు నెంబర్ కేటాయించి అది పరిష్కారం అయ్యే వరకు పర్వేక్షణ జరిపి గ్రామీణ విద్యుత్ వినియోగదారులకు సౌకర్యం కల్పించాలి.	
3.	విద్యుత్ నియంత్రక (డి.టి.ఆర్) విఫలం అయితే తిరిగి పునరుద్ధరించే సమయాన్ని 48 గంటల నుండి 12 గంటలు చేయాలి. గ్రామీణ రోడ్డు మెరుగు పడినందున మరియు సమాచార వ్యవస్థలో విప్లవాత్మక మార్పులు వచ్చి దూరవాణి అందుబాటులో ఉన్న కారణంగా ఇది సాధ్యపడుతుంది. దాని వల్ల విద్యుత్ షాక్ వల్ల జరిగే దుర్మరణాలు తగ్గే అవకాశం ఉంటుంది. వాట్సాప్ ద్వారా అన్ని రకాల కంప్లైంట్ స్వీకరించడానికి వాట్సాప్ నెంబర్ లు కూడా కేటాయించాలి. డిస్కం వారు అదనపు డి.టి.ఆర్.లను స్థానికంగా అందుబాటులో ఉంచారు. కావున 12 గంటలు అనేది సాధ్యమయ్యే పని అని భారతీయ కిసాన్ సంఘ్ భావిస్తుంది.	వాట్సాప్ ద్వారా అన్ని రకాల కంప్లైంట్ స్వీకరణ పరిశీలించగలము. మొబైల్ యాప్ (TSSPDCL Mobile APP) ద్వారా ఫిర్యాదును నమోదు చేసుకోవచ్చు.
4.	విద్యుత్ వల్ల దుర్మరణం చెందిన బాధిత కుటుంబానికి 5 లక్షల ఎక్స్-గ్రేషియా అర్దులు అని తెలుపుతూ బాధిత కుటుంబాలకు ఉత్తరం ద్వారా తెలియజేస్తూ సంబంధిత పేపర్ లు ఏమి కావాలో తెలియజేస్తూ బాధిత కుటుంబాల నుండి అర్జీలు స్వీకరించాలి. దుర్మరణానికి సంబంధించిన తక్షణ సహాయాన్ని TSERC వారు పత్రికలలో వచ్చిన వార్తల ఆధారంగా ఎంత మంది చనిపోయారు ఎంత మందికి ఎక్స్-గ్రేషియా ముట్టినది అని పర్యవేక్షించాలి.	TSSPDCL సంస్థ యొక్క వెబ్ సైట్ (www.tssouthernpower.com) లో " ఎలక్ట్రికల్ <u>యాక్సిడెంట్ రిపోర్టింగ్ సిస్టం</u> " ను పొందుపర్చబడినది. ఫిర్యాదుదారులు స్కాన్ చేయబడిన అవసరమైన పత్రాలను అప్-లోడ్ చేస్తూ ఎక్స్-గ్రేషియా క్లెయిమ్ చేయటానికి వీలు కల్పించబడినది.
8.	విద్యుత్ షాక్ వల్ల గాయపడ్డ వారికి సంబంధించిన వైద్య ఖర్చుల కొరకు మరియు	విద్యుత్ ఘాతం వలన గాయపడి పూర్తిగా కానీ పాక్షికంగా కానీ అంగవైకల్యం పొందిన వ్యక్తులకు ఎక్స్-

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	<p>అతని జీవనోపాధికి డిస్కం ఉద్యోగులు అవుట్ సోర్సింగ్ లో కాకుండా ప్రైవేటుగా కొంత మంది కార్మికులచే, రైతులచే విద్యుత్ పనులు చేయించుకునే అలవాటు డిస్కం వర్గాలకు ఉంది. అటువంటి కారికుల మరియు రైతులు షాక్ కు లోనయి గాయపడ్డ సందర్భాలు ఉన్నాయి. వారికి తాత్కాలికంగా కొంత డబ్బు సర్దుబాటు స్థానిక ఉద్యోగులు చేసి తరువాత మీకు సహాయం ఇప్పిస్తామని ఉద్యోగం ఇప్పిస్తామని నమ్మబలికి సుదీర్ఘకాలం కాలయాపన చేసి మోసగిస్తున్నారు. ప్రయివేటు వ్యక్తులచే పెను చేయిస్తున్నారనడానికి సాక్షం ఈటీవీలో వార్తలలో కూడా చూపించారు. అవి యూట్యూబ్ లో వైరల్ గా మారి అందరికీ చేరింది. ఎన్నో సంవత్సరాలుగా భారతీయ కిసాన్ సంఘ్ ఎ విషయాన్ని నొక్కి వక్కాణిస్తుంది. కావున షాక్ వల్ల గాయపడ్డ వారికి ఎక్స్-గ్రేషియా నిర్ణయించాలి. అమలు చేయాలనీ గౌరవ కమీషన్ ను ప్రార్థిస్తున్నాము.</p>	<p>గ్రేషియా మంజూరు చేయబడుతుంది.</p>
9.	<p>హైదరాబాద్ సౌత్ సర్కిల్ పరిధిలో విద్యుత్ సరఫరా జరుగుతున్నా దాంట్లో బిల్లింగ్ ఐ ఉన్నది ఎంత, నష్ట శాతం ఎంత, దానిని నివారించడానికి తీసుకున్న చర్యలు ఏమిటి? గతంలో భారతీయ కిసాన్ సంఘ్ డిస్కంల వారికి ప్రత్యేక ప్యాకేజీని మీటర్ 1 రూ. కి యూనిట్ ధరల అంటి ఇన్సెంటివ్ ఇచ్చి వారిని కూడా అందరు వినియోగ దారులతో కలిపి, సరఫరా నష్టాన్ని తగ్గించాలి. అక్రమ వాడకం దారుల సమాచారం అందించిన వారికి పారితోషకం ఇస్తూ తరచూ విజిలెన్స్ దాడులు నిర్వహించాలి.</p>	<p>హైదరాబాద్ సౌత్ లో అనధికారిక లోడ్ ఎక్కువగా ఉంది. ఈ అనధికారిక లోడ్ కమర్షియల్ నష్టాలకు మరియు సాంకేతిక నష్టాలకు దోహదం చేస్తోంది. అందులో ప్రధాన భాగం కమర్షియల్ నష్టాలకి సంబంధించినవి అంటే విద్యుత్ డొంగతనాల కు సంబంధించినవే. వీటిని నివారించడానికి, విద్యుత్ చట్టం 2003 నిబంధనల ప్రకారం అన్ని ఆపరేషన్ మరియు DPE wings వారు ఇంటెన్సివ్ తనిఖీలు జరిపి కేసులను బుక్ చేయడం జరుగుతోంది. అయితే, ఎప్పటికప్పుడు నష్టాల ను మరియు ఓవర్లోడింగ్ ను తగ్గించడానికి కూడా పంపిణీ</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు														
	<p>ఆ ప్రాంతంలో పని చేసే ఉద్యోగస్తులను కూడా బాధ్యులను చేయాలి.</p>	<p>నెట్వర్క్ బలోపేతం చేయడం జరుగుతుంది. హైదరాబాద్ సాత్ సర్కిల్ సామాజిక-రాజకీయ సమస్యలకు ప్రసిద్ధి చెందినందున అన్ని రకాల అసమానతలకు వ్యతిరేకంగా సాంకేతిక, కమర్షియల్ నష్టాలను తగ్గించటానికి కఠినమైన కార్యాచరణ ప్రణాళిక ను గవర్నమెంట్ సహకారంతో కొనసాగుతోంది.</p> <p>పైన పేర్కొనబడిన చర్యలు ద్వారా హైదరాబాద్ సాత్ సర్కిల్ లో 2015-16సం. కన్నా డిస్ట్రిబ్యూషన్ నష్టాలూ స్వల్పంగా తగ్గినవి. 2015-16సం మరియు 2016-17సం నష్టాల వివరాలు క్రింద పేర్కొనబడినవి</p> <table border="1" data-bbox="1357 722 2513 1088"> <thead> <tr> <th>సర్కిల్</th> <th>వివరాలు</th> <th>2015-16</th> <th>2016-17</th> </tr> </thead> <tbody> <tr> <td rowspan="3">హైదరాబాద్ సాత్</td> <td>నికర విద్యుత్</td> <td>2021.13</td> <td>1957.45</td> </tr> <tr> <td>బిల్ అయినా విద్యుత్</td> <td>1150.97</td> <td>1134.84</td> </tr> <tr> <td>నష్టాలూ (%)</td> <td>43.05</td> <td>42.02</td> </tr> </tbody> </table>	సర్కిల్	వివరాలు	2015-16	2016-17	హైదరాబాద్ సాత్	నికర విద్యుత్	2021.13	1957.45	బిల్ అయినా విద్యుత్	1150.97	1134.84	నష్టాలూ (%)	43.05	42.02
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10.	<p>మన తెలంగాణా రాష్ట్రంలో గుడుంబా, జూదంలాంటివి అరికట్టబడినవి. అలాగే విద్యుత్ రంగంలో వినియోగదారుని హక్కులను చట్టాలను ప్రచారం చేసి సిటిజన్ చార్ట్ ను అమలు చేసి ఈ రంగంలో ఉన్నటువంటి అవినీతిని కూడా అరికట్టాలి.</p>	<p>వినియోగదారులకు అవినీతి రహిత సేవలకై TSSPDCL తగు చర్యలు తీసుకోవటం జరుగుతుంది.</p>														

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	<p>పవర్ పాలసీ లో విప్లవాత్మకమైన మార్పులు తీసుకువచ్చి కేంద్రం నుండి అవార్డులు జెలిచి గౌరవం పొందడం జరిగింది. విద్యుత్ వినియోగదారుల నుండి చట్ట వ్యతిరేక (అవినీతి సొమ్ము) ఖర్చులు తీసుకోకుండా సేవచేసి విద్యుత్ సరఫరాలో అవినీతి రహిత రాష్ట్రంగా అవార్డు మరియు గౌరవంతో పాటు ప్రజాభిమానాన్ని పొంది రాష్ట్ర ప్రభుత్వ సమర్థతకు రాష్ట్ర పౌరులకు కూడా దేశ ప్రజలందరి మన్ననలను పొందడానికి దానికి భారతీయ కిసాన్ సంఘ్ అఖిల భారత స్థాయిలో తమ గౌరవం పెంచే బాధ్యతను స్వీకరిస్తుందని తమరి ద్వారా సంబంధిత అధికారులు తెలియ జేస్తున్నాము. ఎం.పీ.డి.సి.ఎల్. మెట్ పల్లి మరియు ఎస్.ఫై.డి.సి.ఎల్. మొయినా బాడ్, రంగారెడ్డి (దక్షిణ) తదితర ప్రాంతాలలో సత్వర సేవలందిస్తున్నారని తమరికి సవినయంగా విన్నవించుకుంటున్నాను.</p>	
11.	<p>రాజీవ్ గాంధీ ఇంటర్నేషనల్ ఎయిర్ పోర్ట్ పరిధిలో ఎన్ని కనెక్షన్లు ఉన్నాయో? అవి ఎ క్యాటగిరి కింద చెందినవి తెలియజేయాలి.</p>	<p>రాజీవ్ గాంధీ ఇంటర్నేషనల్ ఎయిర్ పోర్ట్ కి సింగల్ పాయింట్ సప్లై హెచ్. టి. -III కేటగిరి లో వున్నది. అమెజాన్ మరియు నోవోటెల్ కు సబ్ మీటర్స్ ద్వారా హెచ్. టి. -II కేటగిరి లో సప్లై ఎవ్వడమైనది.</p>
12.	<p>గతంలో బస్సు స్టాండ్, రైల్వే స్టేషన్ కు సంబంధించిన క్యాటగిరిలోనే మొత్తం ఉండేది. గౌరవ ఇ.ఆర్.సి. వారు ఈ విషయం పైన గతంలోనే ఒక ఆర్డర్</p>	<p>2011 సంవత్సరంలో జి.ఎం.ఆర్ వేసిన అప్పీలు నెం.12/2011 నందు అప్పీల్స్ ట్రిబ్యునల్ వారు జారీ చేసిన ఆర్డర్ తేదీ: 22.07.2011 ప్రకారం జి.ఎం.ఆర్ ఎయిర్ పోర్ట్ కు HT-II క్యాటగిరి కాకుండా</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	<p>ఇచ్చినారు. గత సంవత్సరం నోబాటల్, అమెజాన్, సంస్థలకు హెచ్.టి.2 క్యాటగిరీలకు మార్చినామని తెలిపారు. మిగతా మధ్యం అమ్మే షాపులు, ఇతర షాపుల హార్డింగ్ లను వీరు చేయలేదు. వీరందరికి పేద ప్రజలకు , బస్ స్టాండ్ లు, రైల్వే స్టేషన్ లకు క్యాటగిరీలోనే ఇస్తున్నారు.</p>	<p>ప్రత్యేక క్యాటగిరీని నిర్ణయించవలసిందిగా కమిషన్ వారిని సూచించింది. అప్పిల్లేట్ ట్రిబ్యునల్ వారి ఆర్డర్ కి వ్యతిరేకంగా అప్పటి APCPDCL సుప్రీం కోర్టు నందు సివిల్ అప్పీలు నెం.1954/2012 వేయడం జరిగింది. ఈ అప్పీలు ఇంకా పెండింగు లో ఉన్నది.</p> <p>అప్పిల్లేట్ ట్రిబ్యునల్ జారీ చేసిన ఆర్డర్ కు అనుగుణంగా గౌరవ కమిషన్ వారు టారిఫ్ ఆర్డర్ 2012-13లో ఎయిర్ పోర్ట్ లోని విమానయాన కార్యకలాపాలకు ప్రత్యేక క్యాటగిరీ HT-III ని రూపొందించారు మరియు ఎయిర్ పోర్ట్ లోని ఇతర కమర్షియల్ కార్యకలాపాలను HT-II క్యాటగిరీలో బిల్లింగ్ చేయవలసిందిగా ఆదేశించారు. దీని కొరకు ఎయిర్ పోర్ట్ లోని విమానయాన మరియు ఇతర కార్యకలాపాలను వేర్పాటు చేయవలసిన అవసరం ఉన్నది. సదరు వేర్పాటుకు టెక్నికల్ గా ప్రత్యేక మీటరింగ్ సాధ్యం కాకపోవడం వలన గౌరవ కమిషన్ వారి ఆదేశాలకు అనుగుణంగా టారిఫ్ అమలుపరచబడుతుంది. మరియు ఎయిర్ పోర్ట్ లోని నోవోటెల్ మరియు అమెజాన్ సంస్థలను HT-II క్యాటగిరీలకు మార్చడం జరిగింది.</p> <p>బస్ స్టేషన్లు మరియు రైల్వే స్టేషన్ల నందు కూడా ఎయిర్ పోర్ట్ లోని కార్య కలాపాలను పోలి ఉండడం వలన గౌరవ కమిషన్ వారు టారిఫ్ ఆర్డర్ 2013-14 లో బస్ స్టేషన్లు మరియు రైల్వే స్టేషన్ల ను కూడా HT-III క్యాటగిరీ నందు కలపడం జరిగింది.</p>
13.	<p>దేశంలో జి.ఎం.ఆర్ కు సంబంధించిన విమానాశ్రయాలలో ప్రయాణాలకు సంబంధించిన ఇతర ఎయిర్ పోర్టులకన్నా జి.ఎం.ఆర్. ఎయిర్ పోర్ట్ ఛార్జీలు</p>	<p>గౌరవనీయ కమిషన్ వారిచే జారీ చేయబడిన రిటైల్ సప్లై టారిఫ్ ఆర్డర్ ప్రకారం వినియోగదారుల వర్గీకరణ చేయడం జరుగుచున్నది. టారిఫ్ విధానం మరియు ఛార్జీల పై తుది నిర్ణయం</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు												
	<p>విపరీతంగా ఎక్కువ ఉన్నవి. అతి తక్కువ చార్జీలను వసూలు చేసే జి.ఎం.ఆర్ సంస్థకు తక్కువ ధరకే విద్యుత్ విక్రయించారని మా అభిప్రాయమని తమరికి విన్నవించుకుంటున్నాము. జి.ఎం.ఆర్ ఎయిర్ పోర్టుకు వెళ్ళిన ప్రయాణికులు తమ వాహనం నుండి దిగడానికి సంబంధించిన సమయాన్ని 5 ని.లుగా నిర్దేశించి అంతకు ఒక నిముషం ఎక్కువైనా పార్కింగ్ చార్జీలు గా 8 ని.ల వరకు 100 రూ.లు అంతకు మించితే 200 రూ.లు ఇంకా ఎక్కువ ఉన్న ఇంత దుర్మార్గంగా ప్రవర్తించే వ్యాపార సంస్థను బస్ స్టాండ్ ల, రైల్వే స్టేషన్ల కేటగిరి కాకుండా వారికి తగ్గట్లుగా టారిఫ్ ను నిర్ణయించి అమలు చేయాలని గౌరవ కమిషన్ వారికి ప్రార్థిస్తున్నాను.</p>	<p>గౌరవనీయ కమిషన్ పరిధిలోనిది</p>												
14.	<p>సి.జి.ఆర్.ఎఫ్. వద్దకు వినియోగదారుడు వచ్చి ఫిర్యాదు చేసిన పిదప నియమిత సమయమైనా 45 రోజులలో తీర్పు ఇవ్వాలి. ఫిర్యాదుదారుని అర్జీలు 01-04-2017 నుండి 30-12-2017 వరకు వచ్చిన ఫిర్యాదులు ఎన్ని, సకాలంలో తీర్పునిచ్చినవి ఎన్ని, కాలాతీతమైనవి ఎన్ని? తీర్పు ఇచ్చి అమలు చేసిన నివేదిక ఇవ్వమని సి.జి.ఆర్.ఎఫ్ వారు అడిగినవి ఎన్ని? డిస్కంల వారు సకాలంలో పని పూర్తి చేసి నివేదికలు సమర్పించినవి అన్ని? తీర్పును అమలు చేయకుండా ఉన్నది ఎన్ని? వాటికి పీ తీసుకున్న చర్యలు ఏమిటి? ఎం.ఓ.పి. లో ఉన్న ప్రకారంగా (పెనాల్టీలు) అపరాధ రిస్క్ వేసినవి ఎన్ని? వి.జి.ఆర్.ఎఫ్. వారీగా వివరాలు తెలపాలని గౌరవ ఇ.ఆర్.సి. ద్వారా నివేదిక కోరుతున్నాము.</p>	<p>2017-18 సం. లో CGRF లోనమోదైన మరియు పరిష్కరింపబడిన ఫిర్యాదులు క్రింద జాబితా చేయబడింది.</p> <p style="text-align: center;"><u>CGRF-I యందునమోదైన మరియు పరిష్కరింపబడిన ఫిర్యాదులు</u> <u>(01.04.2017 నుండి 25.01.2018 వరకు)</u></p> <table border="1" data-bbox="1373 1052 2454 1414"> <thead> <tr> <th data-bbox="1373 1052 1615 1208">సర్కిల్</th> <th data-bbox="1615 1052 1932 1208">నమోదైన ఫిర్యాదులు (01.04.2017 నుండి 25.01.2018)</th> <th data-bbox="1932 1052 2196 1208">పరిష్కరింపబడినవి</th> <th data-bbox="2196 1052 2454 1208">మిగిలినవి</th> </tr> </thead> <tbody> <tr> <td data-bbox="1373 1208 1615 1312">మహబూబ్ నగర్</td> <td data-bbox="1615 1208 1932 1312">575</td> <td data-bbox="1932 1208 2196 1312">504</td> <td data-bbox="2196 1208 2454 1312">71</td> </tr> <tr> <td data-bbox="1373 1312 1615 1414">మెదక్</td> <td data-bbox="1615 1312 1932 1414">186</td> <td data-bbox="1932 1312 2196 1414">139</td> <td data-bbox="2196 1312 2454 1414">47</td> </tr> </tbody> </table>	సర్కిల్	నమోదైన ఫిర్యాదులు (01.04.2017 నుండి 25.01.2018)	పరిష్కరింపబడినవి	మిగిలినవి	మహబూబ్ నగర్	575	504	71	మెదక్	186	139	47
సర్కిల్	నమోదైన ఫిర్యాదులు (01.04.2017 నుండి 25.01.2018)	పరిష్కరింపబడినవి	మిగిలినవి											
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క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు																					
		నల్గొండ	175	117	58																		
		మొత్తం	936	760	176																		
		<p><u>CGRF-II యందు నమోదైన మరియు పరిష్కరింపబడిన ఫిర్యాదులు/గ్రేటర్ హైదరాబాద్</u> <u>(01.04.2017 నుండి 31.12.2017 వరకు)</u></p>																					
		<table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th data-bbox="1486 727 1575 833">క్ర. సం.</th> <th data-bbox="1575 727 2026 833">విషయము</th> <th data-bbox="2026 727 2386 833">CGRF-2/గ్రేటర్ హైదరాబాద్ ప్రాంతము/ హైదరాబాద్</th> </tr> </thead> <tbody> <tr> <td data-bbox="1486 833 1575 927">1</td> <td data-bbox="1575 833 2026 927">01.04.2017 నాటికి మిగిలిన ఫిర్యాదులు</td> <td data-bbox="2026 833 2386 927">324</td> </tr> <tr> <td data-bbox="1486 927 1575 1032">2</td> <td data-bbox="1575 927 2026 1032">2017-18 సం. లో నమోదైన ఫిర్యాదులు (డిసెంబర్ 2017 వరకు)</td> <td data-bbox="2026 927 2386 1032">939</td> </tr> <tr> <td data-bbox="1486 1032 1575 1138">3</td> <td data-bbox="1575 1032 2026 1138">2017-18 సం. లో పరిష్కరింపబడిన ఫిర్యాదులు (డిసెంబర్ 2017 వరకు)</td> <td data-bbox="2026 1032 2386 1138">1151</td> </tr> <tr> <td data-bbox="1486 1138 1575 1232">4</td> <td data-bbox="1575 1138 2026 1232">31.12.2017 నాటికి మిగిలిన ఫిర్యాదులు</td> <td data-bbox="2026 1138 2386 1232">112</td> </tr> <tr> <td data-bbox="1486 1232 1575 1326">5</td> <td data-bbox="1575 1232 2026 1326">2017-18 సం. లో జరిగిన CGRF సమావేశాలు (డిసెంబర్ 2017 వరకు)</td> <td data-bbox="2026 1232 2386 1326">92</td> </tr> </tbody> </table>				క్ర. సం.	విషయము	CGRF-2/గ్రేటర్ హైదరాబాద్ ప్రాంతము/ హైదరాబాద్	1	01.04.2017 నాటికి మిగిలిన ఫిర్యాదులు	324	2	2017-18 సం. లో నమోదైన ఫిర్యాదులు (డిసెంబర్ 2017 వరకు)	939	3	2017-18 సం. లో పరిష్కరింపబడిన ఫిర్యాదులు (డిసెంబర్ 2017 వరకు)	1151	4	31.12.2017 నాటికి మిగిలిన ఫిర్యాదులు	112	5	2017-18 సం. లో జరిగిన CGRF సమావేశాలు (డిసెంబర్ 2017 వరకు)	92
క్ర. సం.	విషయము	CGRF-2/గ్రేటర్ హైదరాబాద్ ప్రాంతము/ హైదరాబాద్																					
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క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు				
			6	2017-18 సం. లో పరిహారం చెల్లించిన ఫిర్యాదులు (డిసెంబర్ 2017 వరకు)	-	
			7	2017-18 సం. లో చెల్లించిన పరిహార మొత్తం(డిసెంబర్ 2017 వరకు)	-	
15.	<p>హై-టెన్షన్ లైన్లు వ్యవసాయ దారుల భూముల నుండి వేయడం జరుగుతుంది. అట్టి లైన్ల నిమిత్తము భూసేకరణ జరగడంలో చట్టాలను అమలు పరచడం లేదు. గౌరవంగా రైటా భూములను కాంట్రాక్టర్లు మరియు అధికారులు ఆక్రమిస్తున్నారు. పొలిసు వారి మరియు రెవెన్యూ వారిచే కూడా బెదిరింపులకు పాల్పడుతున్నారు. వె ఆఫ్ రైట్ మరియు టవర్ కు సంబంధించిన భూసేకరణ విస్తీరణములో కూడా జిల్లా జిల్లాకు వ్యత్యాసం ఉంది. గతానికి, ఇప్పటికీ కూడా వ్యత్యాసం ఉంది. భూసేకరణ నోటీసులు ఇవ్వకుండానే బ్యాంకు అకౌంట్ నెంబర్ లు తీసుకోని కాంట్రాక్టర్లకు అధికారులకు తోచినంత డబ్బు ఇస్తున్నారు. కలెక్టర్ నష్టపరిహారం ఆర్డర్ మరియు ఆ పైన ఇ.ఆర్.సి. కు అప్పీలు చేసుకోవచ్చనే విషయాన్ని బాధిత రైతాంగానికి తెలపడం లేదు. కేంద్రానికి సంబంధించిన 765 కె.వి. హై-టెన్షన్ లైన్ల నష్ట పరిహారం రైతాంగానికి గిట్టుబాటు కాకుంటే ఎవరికీ అప్పీలు చేసుకోవాలో ఎవరికీ తెలియడం లేదు. అట్టి విషయమై టి.ఎస్. ట్రాన్స్ కో మరియు సెంట్రల్ ట్రాన్స్ మిషన్ కు సంబంధించి బాధిత రైతాంగానికి వారి హక్కుల గురించి తెలియ</p>	TS Transco వారి పరిధి లోనిది				

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	<p>జేయాలి. గౌరవ టి.ఎస్.ఇ.ఆర్.సి వారు జేసులు సుమోటోగా నమోదు చేసుకొని రైతాంగాన్ని ఆదుకోవాలని కిసాన్ సంఘ ప్రార్థిస్తున్నది.</p>	

S.No.	Summary of Objections / Suggestions	Response of the Licensee
54. D. Ravi , Bharatiya Kisan Sangam northern Telangana Vidyut pramuk, Cell.No. 9908295502		
i	<p>వ్యవసాయ కనెక్షన్ల జాప్యం జరిగిన ప్రదేశాలలో మీ దృష్టికి తీసుక వచ్చిన కంప్లైంట్ల లో సంబంధిత అధికారులకు ఎక్కడైనా జరిమానా విధించినరా? ఏ విధమైన చర్యలు తీసుకుంటున్నారు ?</p> <p>టోల్ ఫ్రీ లాంటిదే టోల్ ఫ్రీ వాట్సాప్ నెంబరు కేటాయించ గలరు.</p> <p>విద్యుత్ శాఖకు సంబంధించిన అధికారులు ప్రమాదవశాత్తు మరణిస్తే వారికి ఏ విధమైన సాయం చేస్తున్నారు ? ఎంత చేస్తున్నారు ?</p>	<p>వాట్సాప్ ద్వారా అన్ని రకాల కంప్లైంట్ స్వీకరణ పరిశీలించగలము. మొబైల్ యాప్ (TSSPDCL Mobile APP) ద్వారా ఫిర్యాదును నమోదు చేసుకోవచ్చు.</p>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
<p>56. Yantra Green Power Pvt. Ltd., North End Building, Road No. 2, Banjara Hills, Hyderabad-500 034 57. COSMIC Power solutions Ltd., Plot No. 347/1, Road No. 23, Jubilee Hills, Hyderabad- 500 033 58. Peritus Corporation Private Ltd., 601, Cyber Heights, Plot # 13, Road No. 2, Banjara Hills, Hyderabad- 500034 59 Repal Green Power Private Ltd. , 2-9/5/6, First floor, Trendz Venkata Sai Gateway, Green Land Colony, CGachibowli, Hyd. -500 032</p>		
<p>i</p>	<p>The Honorable commission (TSERC) Vide its order dated: 22-12-2017 in O.P.No. 23 of 2016, passed an amendment order to the retail supply tariff order for the year 2017-18 duly exempting solar projects from levy of CSS in line with the Combined AP solar policy of 2012 and Telangana Government Solar Policy of 2015.</p> <p>Now in line with these government policies it is requested to Honorable Commission (TSERC) for exempting solar projects from levy of CSS and Additional Surcharge (AS) in its retails supply tariff order for the year 2018-19.</p>	<p>As the Telangana Solar power policy will be in force for five years from 01.06.2015, therefore, the licensee requests the Hon'ble Commission to continue the exemption of Cross Subsidy Surcharge for the open access consumers within state buying solar power from solar power developers for the FY2018-19 as stipulated in Solar Power Policy in accordance to the amendment to Cross Subsidy Surcharge order for FY 2017-18 dt.22.12.2017.</p> <p>As the exemption of Additional surcharge is not stipulated in the AP Solar Policy of 2012 and Telangana Government Solar Policy of 2015, additional surcharge shall be levied on Open acces consumers availing supply from solar power developers also in order that the DISCOMs shall not forego its legitimate revenue to recover its costs</p>
<p>ii</p>	<p>With respect to APERC order APERC/Secy/25/2013 dated 04-05-2013 we request Honorable Commission (TSERC) to give relief to solar developers/generator/consumers by exempting from the levy of TOD charges by including it in the tariff order</p> <p>The exemptions requested above be allowed to the solar projects set up under A.P.. Solar policy, 2012 & Telangana Solar Policy, 2015.</p>	<p>The levy of ToD charges is to maintain Grid Stability and to contain the Peak loads. Hence it shall be continued.</p>
<p>iii</p>	<p>This hefty CSS, Additional Surcharge and TOD levy is compounding to our already existing heavy burden emanating from all other outstanding issues in open access power supply which is making our life miserable and we are sure we cannot survive any further. We are unable to honour our bank debt obligations, pay salaries to our employees and operate our plant smoothly in the current environment. And we are running from pillar to post every year on the same issue. While, EASE OF</p>	<p>The levy of Cross Subsidy Surcharge and Aditonal Surcharge is as per the mandate of the Electricity Act, 2003.</p> <p>Any relief in Cross Subsidy Surcharge and Additional Surcharge will lead to underrecovery of costs to the DISCOMs and have impact on the financials of the DISCOMs</p>

	<p>DOING Business provisions are hardly being manifested by the utilities as the enabling provisions are hardly been proactively implemented.investment climate in our newly born state has been greatly being jeopardized. It seemed we have just had relief of Cross Subsidy Surcharge and in no time we are again in threat of Additional Surcharge.</p>	
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S.No.	Summary of Objections / Suggestions	Response of the Licensee
60. President,Rice Millers Association Telangana State, Flat No. 108, Taj Enclave, Beside Meera Theatre, Khairatabad, Hyd- 500 004		
i	<p>Unjustifiable removal of HT-1A (Optional Category): The para boiled industry is essential in our state since it directly process the paddy produced by the farmers, most of which is fit for parboiling, due to climatic, soil, water supply etc. The existence of this industry is essential for the well being of the farmers. The Hon'ble Commission had created the HT 1A Optional Category during FY 16-17 which was boon to the small scale and medium enterprises. However, the Discoms have issued orders to remove the benefit enjoyed under optional category when the industries exceed the Demand above 150 KVA for two consecutive months in a financial year and to continue to bill such consumers under HT-1A Industry category. This is very unfair and unjustifiable since most rice mills were set up long back and any technical issues with motors and other electrical appliances may result in lower power factor and increased consumption beyond the Contracted Demand. APPEAL: we request the Hon'ble commission to instruct and pass necessary orders such that the consumers must not be removed from the Optional category though such demand may exceed for atleast 4 consecutive months in a year. If such instances exceed 4 consecutive months in a year, such consumer may be removed from enjoying the benefits of HT 1A optional category. Else the Hon'ble commission may increase the permissible Demand upto 200 KVA from the present 150KVA.</p>	<p>Based On the request of rice millers association, the Honble Commission has created a separate Optional sub-category under HT-I(A) from FY 2016-17 upto contracted maximum demand of 150 kVA with lesser demand charges and high energy charges so as to meet the requirement of rice mills.</p> <p>Further, the Honble Commission has given clarification on conversion of HT-I (Optional) category to HT-I (Industrial General) and levy penalty for exceeding CMD on 19.12.2017 which is as follows</p> <p>“ If any consumer who is availing supply under HT-I Optional category exceeding CMD in 2 billing cycles in the consecutive months.</p> <p style="text-align: center;">Or</p> <p>If the consumer exceeds CMD in any 3 billing cycles in a financial year.”</p> <p>The increase of CMD limit from 100 HP to 150 HP (kVA) has been addressed by the Honble Commission by creating a sub-category under HT-I(A) as Optional category. Further, the limitation of 2 billing cycles for exceeding CMD over 150 kVA will bring discipline among the Consumers and ensure that it will not be misutilised.</p>
ii	<p>Separate Power Tariff for SMEs: The Hon'ble Commission is aware that the small and medium enterprises act as the real growth-drivers for the nation by generating large employment opportunities and promoting equality of wealth in the society.</p>	<p>The creation of optional category under HT-I(A) is primarily to meet the requirements of the Small and Medium Enterprises with lower demand charges compared to HT-I(A) General Futher creation of sub-categories will lead to more complex Tariff</p>

	<p>APPEAL: The Hon'ble commission may consider sanctioning a separate concessional tariff category for SMEs. The SMEs should be allowed to choose for the regular tariff or the SME tariff. Since majority of consumers belong to SME sector a separate tariff will help SMEs to compete with others from neighbouring States.</p>	<p>Structure which is differing to the Tariff Simplification principles as proposed by the Committee on Simplification of Tariff constituted by Ministry of Power, GoI.</p>
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S.No.	Summary of Objections / Suggestions	Response of the Licensee
61. The Managing Director, Bus Bhavan, Mushirabad, hyderabad, Telangana State. Off &Fax :040-27601313 & 040-27611122. Email: jmd@tsrtc.telangana.gov.in		
i	<p>The Principle Secretary to Government, TR&B Department issued a draft copy of the State Electrical Vehicle Policy for Battery system to set a target of 100% Electric buses by 2030 for Inter-city, Intra- city & Inter State transport (Key milestones – 25% by 2022. 50% by 2025 and 100% by 2030).</p> <p>It is understood that tariff proposal for Electric vehicle charging stations/charger infrastructure/ Battery swap set up at low voltage and also for HT voltage level are sent by the CPDCL Department, to consider under category-II for LT Supply and HT-II category under HT Supply to TSERC.</p> <p>In this connection, it is requested that TSRTC is a Public undertaking Transport and is having 97Depots. The Corporation is registered under Industrial Act and it is transporting 93.62lakhs commuters daily on TSRTC buses and running the buses to far away villages from urban areas to meet the commuters and transport the public.</p> <p>Hence, it is requested to consider the power supply of HT category to Electric charging stations under minimum subsidy rates as directed by the GoTS, so as to complete the Electric buses project within stipulated time and render its services to the public.</p>	<p>The subsidized (or) concessional tariff for Electric vehicle charging stations/charger infrastructure/Battery swap set up at LT/HT voltage level by the TSRTC will be provided if the GoTS extends any subsidy to the above category under section 65 of the Electricity Act, 2003.</p>