

| Sl.No | Objections/suggestions | TSGENCO REPLY |
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| 1 | <p>TS GENCO has sought the revised fixed charges for the subject project to the tune of Rs.5554.60 crore for the period from 2019-20 to 2023-24 against Rs.6535.13 crore claimed to have been provisionally approved. Compared to the provisionally approved fixed charges for the first three years of a total of Rs.4640.96 crore, the revised claim has come down to Rs.3504.96 crore. The reduction for the three years is Rs.1136 crore. The implication is that GENCO could not generate and supply power from BTPS to the extent expected during that period based on which the Hon'ble Commission worked out permissible fixed charges earlier. For the year 2023-24, GENCO has revised its claim for fixed charges from the provisionally approved Rs.1894.18 crore to Rs.2049.68 crore. The implication is that BTPS is expected to generate and supply more power than what was estimated for the current financial year or that the increase is based on additional expenditure GENCO has claimed to have incurred, with or without increase in estimated availability of power from the station.</p> | <p>Revised Tariff Petition of BTPS has been filed in compliance to the directive no. 6 of Multi Year Tariff Order Dt. 22.03.2022. The Revised fixed charges claimed are provisional estimates based on administrative approval and scheduled completion of various works.</p> <p>Subsequently, Mid-Term Review petition is filed in line with regulations, based on the actual capital expenditure incurred up to the date of commercial operation of the last unit (Unit 4) of BTPS and capitalized as per audited accounts amounting to Rs.6946.30 Crs. There are certain capital works in Progress (CWIP) viz., FGD, Staff Quarters & Township, Railway line, Marshaling yard etc., amounting to Rs.3,569.54Crs. (Approx.) which shall be capitalized upon completion and the same shall be claimed in tariff.</p> <p>In the Multi Year Tariff order Dt.22.03.2022, the Hon'ble commission has provisionally approved the Annual Fixed Charges. In comparison of Fixed Charges approved in MYT, with the amounts claimed in Mid – Term Review there is a variation in the claim. Variation is on account of the following:</p> <ul style="list-style-type: none"> I. Change in the Commercial operation dates of the units of BTPS. II. Reduction in fixed charges during the period F/Y 2020–23, is on account of: <ul style="list-style-type: none"> a) Actual Capital cost of project. b) Change in interest rates. III. Increase in fixed charges during the F/Y 2023–24, is on account of: <ul style="list-style-type: none"> a) Proposed Capitalizations of ongoing capital works, b) Increase in Income Tax Rates (from 17.472% to 25.168%), |

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| | | <p>c) Considering Year over Year O&M charges escalation as per CERC Rates.</p> <p>Further, the Fixed Charges filed in the petition are as per the Norms approved in the Hon'ble TSERC' 2019 Regulations. However, TSGENCO Fixed Charges claim from TSDISCOMS is limited to actual operating parameters.</p> |
| 2. | <p>For the period of three years from 2019-20 to 2021-22, TS GENCO has sought true up of Rs.31.89 crore towards fixed charges against the approved Rs.20983.75 crore and actual Rs.21015.54 crore.</p> | <p>As per mid-term true-up filing, the increase in fixed charges for three year period is very minimum of Rs.31.89 Crores and it is due to change in interest rates, capitalisation of certain capital works, increase in income tax rate and claiming of O&M Cost of new projects (KTPS VII and BTPS) as per actuals. These are in line with the Hon'ble TSERC regulation as against CERC norm allowed in MYT orders. As there are no specific comments / objections by Sri.M.Venugopala Rao, Garu, hence no further comments are offered in this regard.</p> |
| 3. | <p>For the two years 2022-23 and 2023-24, GENCO has claimed revision of fixed charges to increase by R.337.67 crore from the approved Rs.15745.08 crore to the projected Rs.16082.75 crore.</p> | <p>As per mid-term filing, the estimated fixed charges for the subsequent two years period increased by Rs.337.67 Crores is due to change in interest rates, proposed capitalisation of ongoing capital works, increase in income tax rate and claiming of O&M Cost of new projects (KTPS VII and BTPS) escalated based on actuals. These are in line with Hon'ble TSERC regulation as a norm allowed in MYT orders. As there are no specific comments / objections by Sri. M.Venugopala Rao, Garu, hence no further replies /comments are offered in this regard.</p> |
| 4. | <p>As per the submissions made by GENCO in its subject petitions, there has been abnormal delay in declaring commercial operation dates of the four units of the subject station as given below:</p> | <p>As per Appendix – I of CERC Regulations' 2014, "Time line for completion of Projects", for coal based thermal power plants capacity in the range of 200 MW to 330 MW is "33 months for green field projects, subsequent units at an interval of 4 months each". In respect of BTPS it would be:</p> |

**Reply to the Objections/suggestions raised by Sri. M. Venugopala Rao, Sr. Journalist & Convener, Centre for Power Studies, Hyderabad,
dt. 06.01.2023**

| UNIT | SCHEDULED COD | COD DECLARED ON | DELAY | Zero Date | | Scheduled CODs (As per CERC Norms) | Actual CODs | Delay in Months |
|-----------------|---|-----------------|-----------|---|----------|-------------------------------------|-------------|-----------------|
| 1st | 20.3.2017 | 5.6.2020 | 39 months | 21.03.2015 | Unit I | 20.12.2017 | 05.06.2020 | 30 |
| 2 nd | 20.5.2017 | 7.12.2020 | 44 months | | Unit II | 20.04.2018 | 7.12.2020 | 32 |
| 3 rd | 20.7.2017 | 26.3.2021 | 45 months | | Unit III | 20.08.2018 | 26.03.2021 | 30 |
| 4th | 20.9.2017 | 9.1.2022 | 52 months | | Unit IV | 20.12.2018 | 09.01.2022 | 36 |
| | | | | There was a delay due to the various Forced Majeure situation which are not attributable either to TSGENCO or contractors and the reasons for delay are already explained at the time of Multi Year Tariff filings and the Hon'ble commission examined the submissions made by TSGENCO. | | | | |
| 5 | The power purchase agreement was signed on 17.9.2019 and amended on 22.12.2021 which is valid up to 8.1.2047. The capital cost, including interest during construction, was originally estimated to be Rs.7290.60 crore. GENCO has submitted that it would increase to Rs.10515.24 crore by 1.4.2023 from Rs.8691.43 crore provisionally approved up to 22.3.2022. In other words, the capital cost increases by 3235.24 crore or 44.37%. Whatever be the reasons, abnormal delay in executing the project and declaring CODs of the four units from 39 to 52 months has led to this abnormal escalation in capital cost, including IDC, of the station. As per the revised capital cost, cost per MW works out to Rs.9.74 crore which is abnormal and prohibitive. | | | Regarding the increase in project cost of BTPS, the following is submitted for consideration of Hon'ble commission. i. The original capital cost of the project is Rs.7290.60 Crores. ii. Due to Change in law by Government of India towards stringent Environmental Norms towards Flue Gas Desulfurization the Cost of the project increased by Rs.880 Crores. iii. Due to change in tax law by Government of India replacing Indirect taxes with Goods and Services Tax w.e.f 01-07-2017, cost of the project increased by Rs.300 Crores (151Crores towards BHEL works and 149 crore (Approx) towards Non EPC supplies and works). iv. The above are beyond the control of the TSGENCO. Hence the actual original project cost is Rs.8470 Crores as against Rs 7290.60 Crores. | | | | |

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| | <p>v. TSGENCO is making all efforts to complete the project within the revised administrative cost of Rs.10515.84 cores and assured to the Hon'ble commission that the project will be completed within the revised administrative approval cost and no additional cost will be incurred over and above the approved cost of Rs.10515.84 Crores.</p> <p>vi. In this connection it is to submit that till the date of COD of final unit of the project the expenditure capitalised is Rs.6946.30 Crores and the cost of balance works in progress amounting to Rs.3569.54 Cores are in different stage of completion.</p> <p>vii. Some of the ongoing and pending works as on date which were taken-up for the essential operation of the project are detailed below for information and consideration of Hon'ble Commission.</p> <p>a. FGD (Fuel gas desulphurisation) ongoing works which are mandatory as per Ministry of Power/CEA/MOEF for all thermal projects is Rs.880 Crores.</p> <p>b. Residential Quarter to the staff and Construction of essential social infrastructure in Town-Ship etc., Approximately Rs.650 Crores.</p> <p>c. Railway line and Marshalling Yard approximately Rs.500 Crores.</p> <p>d. Flood protection walls approximately Rs.50 Crores (additional work due to recent unprecedented floods to the Godavari river).</p> |
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| | | <p>e. Ongoing works in M/s.BHEL scope viz., Mill rejects systems, boiler and turbine lifts etc. Rs.200 Crores.</p> <p>viii. It is further stated that, the increase in project cost due to the above mentioned Force Majeure conditions (change in tax law, NGT Orders, COVID etc.), the increase in project cost comes to around 20% not 43% as observed by the petitioner.</p> |
| 6 | <p>GENCO has come up with the subject petitions, without submitting the PPA for consideration and approval by the Hon'ble Commission. In other words, it is seeking another provisional approval for the revised capital cost based on its projections and revision and true-up of fixed charges, without PPA being approved. There is no finality to even to this projected capital cost, as it is projected on capital expenditure to be incurred up to 1.4.2024 and what further escalations would take place is anybody's guess. In other words, GENCO may come up in future with a petition seeking further revision of capital costs of the station and true up of additional claims for fixed charges For the year 2023-24, it is shown in the ARR submissions of the DISCOMs that, with a PLF of 78% against normative PLF of 85%, availability from BTPS is 7378 MU and fixed cost per unit Rs.2.57 and variable charges Rs.2.36 per unit, i.e., a tariff of Rs.4.93 per unit.</p> | <p>With regard to the PPA of BTPS, TSGENCO & TSDISCOMs has already entered Power Purchase Agreements valid up to 08.01.2047, and Hon'ble TSERC has accorded its consent to the PPA vide Order Dt.06.08.2021, a detailed explanation is furnished in Reply to Para No.8.</p> <p>In respect of Capital cost, as per Hon'ble TSERC Regulations, the Capital Expenditure up to the Commercial Operation Date of the last unit and there after additional capital expenditure incurred up to the Cut – Off Date i.e., 31.03.2025 (Last quarter after 3 years) may be admitted by the Hon'ble Commission subject to prudent check.</p> <p>As per the latest administrative approval, the projected capital cost is of Rs.10515.84 Crs, which was already figured in Clause No.6.3.4 of the Multi – Year Tariff Order for the control period FY 2019 – 24, Dt.22.03.2022.</p> <p>Further, with regard to PLF in ARR filings for F/Y 2023 – 24 of TSDISCOMS in respect of BTPS, TSGENCO proposed for Gross Generation of 8063.72 MU (85% PLF), after adjusting the Auxiliary Consumption of 685.42 MU (8.5% as per Hon'ble TSERC Regulations), Net Energy Export is 7378.30 MU. TSDISCOM has considered the Net Energy Export.</p> |

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| <p>7 Regulation No.1 of 2019 of the Hon'ble Commission relating to terms and conditions of generation tariff stipulates, inter alia, that "the Generating Entity shall file the application for determination of final tariff for new Generating Station within one hundred and eighty Days (180) from the COD of Generating Unit or Stage or Generating Station as a whole, as the case may be, based on the audited capital expenditure and capitalisation as on the COD" Clause 4.2.7).</p> <p>It further says: "where there is no power purchase agreement or arrangement, the supply of electricity by such Generating Entity to the Distribution Licensee after April 1, 2019 shall be in accordance with a power purchase agreement approved by the Commission. Provided that the petition for approval of such power purchase agreement or arrangement shall be filed by the Distribution Licensee with the Commission within three months from the date of notification of these Regulations" (clause 4.3.2).</p> <p>The Regulation stipulates that "The Commission shall, within one hundred and twenty (120) days from receipt of a complete petition, and after considering all suggestions and objections received from the public:- (a) Issue a Tariff Order accepting the Petition with such modifications or conditions as may be stipulated in that Order" (clause 4.5.1)</p> <p>Several clauses of the Regulation underline need for financial prudence. It emphasises that "variations in capitalisation on account of time or cost overruns or inefficiencies in the implementation of a capital expenditure scheme not attributable to an approved change in its scope, change in statutory levies or Force Majeure Events," "Variation in Operation And Maintenance Expenses" and "variation in coal transit losses, among others, may be attributed by the Commission to controllable factors (clause 6.7) have to be subjected to prudence check. "Prudence check may include scrutiny of the reasonableness of the capital expenditure,</p> | <p>The issues were raised by Sri.M. Venugopala Rao garu, in para No.8 of his submissions of additional objections/suggestions vide letter Dt. 30.03.2021 on the True-up & MYT proposals of TSGENCO for the control period 2014-19 & 2019-24. Replies to Objections/Suggestions were furnished by TSGENCO on dt: 29.05.2021. However, the same are reproduced below:</p> <p>"The Hon'ble Commission will approve the capital cost after taking into consideration the reasons for cost over run time over run, financing prudence etc.</p> <p>Further as per Clause No. 7.19 (j) of TSERC Regulations '2019 Any liability for works admitted by the Commission after the Cut-Off Date to the extent of discharge of such liabilities by actual payments.</p> <p>7.19 (k). Any additional capital expenditure which has become necessary for efficient operation. "</p> <p>Provided that the claim shall be substantiated with technical justification duly supported by documentary evidence like test results carried out by an independent agency in case of deterioration of assets, damage caused by natural calamities , obsolescence of technology , up-gradation of capacity for the technical reason such as increase in fault level.</p> <p>Regarding PPA of BTPS, Hon'ble TSERC accorded consent to the PPAs vide Hon'ble TSERC "COMMON ORDER" on O.P.No.15 to 19 of 2021 Dt.06.08.2021, subjected to certain amendments to certain clauses and Articles of PPAs and TSDiscoms were directed to submit PPAs duly incorporating changes for the record of the Commission. In compliance with the direction of Hon'ble TSERC, the amendments were carried out by TSGENCO</p> |
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| | <p>financing plan including the choice and manner of funding, interest during construction, use of efficient technology, cost over-run and time over-run, and such other matters as may be considered appropriate by the Commission for determination of tariff” (clause 7.10).</p> <p>Clause 7.19.1 says: “Any additional capitalization after COD needs prior approval of the Commission.”</p> <p>Clause 7.22.4 emphasises that “(a) The entire cost due to time over run has to be borne by the Generating Entity in case the causes for over-run are entirely attributable to the Generating Entity. For example, imprudence in selecting the contractors/suppliers and in executing contractual agreements including terms and conditions of the contracts, delay in award of contracts, delay in providing inputs like making land available to the contractors, delay in payments to contractors/suppliers as per the terms of contract, mismanagement of finances, slackness in project management like improper coordination between the various contractors, etc.” Further it says: (b)..... “Provided that the consumers should get full benefit of the Liquidated Damages (LDs) recovered from the contractors/suppliers of the Generating Entity and the insurance proceeds, if any, to reduce the capital cost.”</p> | <p>and TSDiscoms on 22.12.2021 and submitted to the commission on 19.01.2022. Therefore the PPAs entered with Discoms were approved by Hon’ble TSERC.</p> <p>In compliance with Clause 7.19.1, TSGENCO is submitting “Capital Investment Plan” for approval of the Hon’ble TSERC, from time to time.</p> <p>In compliance with Clause 7.22.4, TSGENCO is crediting the recovered penalties/liquidated damages to the capital cost of the project.</p> |
| 8 | <p>Why TS GENECO is not submitting PPA of the subject station for approval of the Commission and why the latter is entertaining the petitions of GENCO, without considering PPA, continues to be questionable and goes against the provisions of the Commission’s applicable regulations. As usual, TS DISCOMs, which are parties to the PPA, are not filing their counters to the petitions of GENCO, questioning abnormal escalations in the claimed capital costs of the station, thereby shirking their responsibility to protect their interests, which, in turn, means interests of their consumers of power. It is not known whether the Hon’ble</p> | <p>TSGENCO has entered PPA with TSDISCOMS for sale of power generated at BTPS on Dt.17.09.2019.</p> <p>Southern Power Distribution Company of Telangana Limited (TSSPDCL) on behalf of TSDiscoms viz., TSSPDCL and Northern Power Distribution Company of Telangana Limited (TSNPDCL), have requested for granting in principal consent for purchase of power u/s 86 (1) (b) of the Electricity Act, 2003 in respect of BTPS on 26.09.2019.</p> |

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| <p>Commission has directed the DISCOMs to file their counters to the subject petitions. The DISCOMs, as respondents, should not be allowed to shirk their responsibility to meet regulatory requirements.</p> | <p>Hon'ble Commission has taken the requests of TSDiscoms on record, examined with reference to the legality i.e., in the context of the provisions of the Electricity Act, 2003, Policy, provisions under applicable Regulations and sustainability of the clauses in the PPAs and decided to finalise the approval or consent of the PPAs through public consultation process and assigned the Suo-Moto O.P.No.17 of 2021.</p> <p>The Commission organised Public Hearing as per the revised schedule i.e., on 30.06.2021 at 11:30 am through virtual video conference. The following stakeholders attended virtual Public Hearing held on 30.06.2021:</p> <ol style="list-style-type: none">1. Sri M. Venugopala Rao, Senior Journalist & Convener, Centre for Power Studies, Hyderabad.2. Federation of Telangana Chambers of Commerce and Industry, Hyderabad. <p>Based on the objections/suggestions/comments received from the stakeholders, the Commission accorded the consent to the PPAs vide Hon'ble TSERC "COMMON ORDER" on O.P.No. 15 to 19 of 2021, Dt.06.08.2021, subject to amendments in certain clauses and Articles of PPAs. TSDiscoms are directed to submit the PPAs duly incorporating changes for the record of the Commission.</p> <p>In compliance with the directions of Hon'ble TSERC, the proposed amendments were carried out by TSGENCO & TSDISCOMS on 22.12.2021 and submitted to the commission on 19.01.2022. Accordingly, the PPAs entered with Discoms were approved by Hon'ble TSERC.</p> |
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| 9 | The reasons given by TS GENCO for delay in execution of the subject station, escalation in its capital cost, including IDC, and resultant avoidable and additional burdens on consumers, are untenable for the following reasons, among others: | |
| | a) As per the original schedule, CODs of the four units of BTPS had to be declared between 23.3.2017 and 20.9.2017. The developments subsequent to the scheduled COD of the 4 th unit cannot justify the delay in declaring scheduled CODs. | The detailed justification for delay in COD is furnished as reply to Para No.4. |
| | b) Granting of environmental clearance by the Ministry of Environment, Forest and Climate Change and mandating of new emission norms, and direction of National Green Tribunal are shown as reasons for the delay in execution of the station by TS GENCO. In view of the scheduled declaration of CODs, TS GENCO should have applied and got EC from the Ministry well in time. Without doing that, it acted in a casual manner, leading to the said direction of NGT. Application for EC was filed by GENCO on 8.4.2016 and it took several months to get EC from the Ministry on 15.3.2017. In other words, GENCO should have initiated the process well in time and pursued with the MoEF&CC to get the EC. Who is responsible for taking up the project, without getting EC from the Ministry? What was the direction given by NGT on this failure? | <p>As per the directions of Govt. of Telangana State, TSGENCO had entered an MOU with M/s.BHEL on 04.10.2014, in the presence of the Hon'ble Chief Minister of Telangana State for construction of 6000 MW Power Plants on EPC basis in Telangana State. As per TS Govt. consent has been received from Prl Secretary to CM with directions to TSGENCO to set up (4 X 270 MW) Thermal Power Plant at Manuguru. The present Bhadradri (4 X 270 MW) Thermal Power Plant is a part of capacity addition programme for 6000 MW in Telangana State.</p> <p>TSGENCO has applied for MoEF & CC clearance in FORM – I through online on Dt.03.02.2015 & Hard copy was submitted on 09.02.2015.</p> <p>MoEF & CC has issued Terms of References (TOR) for BTPS on 23.06.2015.</p> <p>In the process Hon'ble NGT has directed to stop all the construction works. Accordingly, TSGENCO has suspended all the works during the period Dec '15 to March '17 for a period of 15 Months. Later MoEF & CC has accorded Environmental Clearance on Dt.15.03.2017.</p> |

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| | | <p>Hence, the process of obtaining Environmental Clearances has begun much before commencement of BTPS Construction (4X270 MW).</p> |
| | <p>c) Rains and Covid 19 are subsequent developments and for a temporary period. They cannot justify a delay in execution of the units of the station by 39 to 52 months.</p> | <p>Rains and Covid-19 are some of the reasons for the delay. The NGT orders thereafter and MOEF& CC clearances etc., contributed for the delay.</p> |
| | <p>d) Another reason trotted out by GENCO is that boiler erection works of unit IV of the station were hampered due to diversion of oxygen cylinders for medical purposes at the behest of the Gol. That diversion is also for a limited period and that cannot be the reason for delay in declaring CODs of the first three units and of the unit IV for a period of 52 months.</p> | <p>Diversion of Oxygen Cylinders is only one of the reasons for delay in COD of Unit – 4, other reasons were already submitted in the filings.</p> |
| | <p>e) When GoTS decided to establish BTPS and order was placed on BHEL for supply of required machinery, serious allegations were made. Instead of taking up this project with super critical technology, it was decided to purchase the said machinery, with sub critical technology, lying with BHEL for several years, which was originally manufactured for a private company “India Bulls,” as the latter failed to make payments. The claim of the powers-that-be was that, since that machinery was readily available, BTPS can be completed early and power from the station would be available early. It was also pointed out that for using sub critical technology substantial quantum of imported coal was needed and that several problems would arise, leading to increase in costs of generation and resultant additional burdens on consumers of power. The abnormal delay in execution of BTPS belied the claim that, with the said sub-critical technology machinery purchased from BHEL, completion of the station could be advanced.</p> | <p>BHEL is a Maharathna Central PSU and has expertise in establishment of Thermal Power Stations across the country and also is the sole manufacturer of BTG in the Govt sector.</p> <p>It is erroneous on the part of petitioner to conclude that, BTPS plants will be dependent on imported coal. BTPS Coal requirement is met from domestic coal, as per linkage granted by Ministry of Coal, GOI. Now units are operating satisfactorily with coal supplies from SCCL and no imported coal is envisaged in future also.</p> <p>Further, but for the Force Majeure conditions stated in detailed above, BTPS units could have been commissioned as per the scheduled target dates.</p> |

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| <p>f) BTPS is a case of failures of commission and omission due to imprudent decisions taken and failure to take required steps in time and in an orderly manner. As a result, for the failures of commission and omission of the GoTS and TS GENCO, consumers are being penalised, with imposition of avoidable burdens on them in the form of higher tariffs for power being purchased from BTPS, for their no fault.</p> | <p>For any Large scale project, gestation period is needed to reach a stage where it can start showing returns. Especially in case of Thermal Power Projects, capital cost in the initial years of investment may appear to be more but in the long run these projects would yield reasonable rates of return & cheaper and reliable power.</p> <p>There were no failures of commission & omission in the project either by TSGENCO or TS Government. The delay was purely on account of unavoidable situations & Natural Calamities and Force Majeure as explained above in detail. Further, the capital cost increase is on account of FGD & implementation of GST statutory provisions etc.</p> <p>Further, it is stated that when compared with the CERC Norms of Benchmark Hard Cost (as per the CERC Order Dt.04.06.2012) and escalated thereon, capital cost of Thermal Power Projects comes to around Rs.8.54 Crs. per MW upto 2021–22. The Benchmark Hard Cost of CERC does not include MGR, Railway siding, unloading equipment at jetty, and Rolling stock, locomotive, Transmission line till tie point. As against this the actual capital cost of BTPS comes to around Rs.8.46 Crs. without FGD.</p> <p>Hence, it is to reiterate that there were no failures of commission & omission on the part of Government of Telangana state or TSGENCO.</p> |
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| 10 | <p>In the name of provisional approvals, allowing the unjustifiable escalations in capital costs of BTPS during the period of impermissible delay in execution of the station repeatedly is against larger consumer interest and prudent norms. In this connection, we reiterate that some of the questionable provisions in the applicable regulation of the Commission need to be amended prudently.</p> | Not in TSGENCO purview. |
| 11 | <p>In response to our submissions, the Hon'ble Commission pointed out, in its order dated 22.3.2022, relating to the projects of TS GENCO, including BTPS, that "The Commission issues notices to all the respondents, as directed by the Commission the petitioner published a public notice in daily newspapers inviting objections/suggestion from all interested stakeholders and public at large on TSGenco's Petitions and it is on the choice of individual stakeholder to submit objections/suggestions and it is the choice of individual stakeholder to submit objection/suggestions. The Commission cannot insist any stakeholder to submit objections/suggestions. However, TSDiscoms, as respondents, were expected not merely present but actively to participate in this process to ensure transparency. The Commission is of the view that the better participation in the public consultation process would increase effectiveness of Regulatory system" (3.3.5 page 20). No doubt, as far as individual stakeholders are concerned, it is their choice to submit objections/suggestions. That cannot be the case with respondents. Silence and non-response of the DISCOMs in the subject petitions means that they cannot act independently or that they are not allowed to act independently to protect their interests and those of their consumers of power. Secondly, it implies that they have no objection to the claims of TS GENCO in the subject petition or that they cannot express objections, if any. Thirdly, it implies that, whatever claims of TS GENCO the Hon'ble</p> | Not in TSGENCO purview. |

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| | <p>Commission permits, the DISCOMs would simply pass through them to their consumers and wash off their hands. If the Commission issues notices to all the respondents, here, the TS DISCOMs, it should see to it that they participate in the regulatory process and respond to the claims of GENCO and points raised by objectors in the subject petitions. Otherwise, issuance of notices would be of no value and purpose.</p> | |
| 12 | <p>There was no response to our submission - "TSGenco sent replies to written submissions (dated 30.03.2021) on 29.05.2021, i.e., nearly after two months on the same day when date of public hearing was conveyed, which does not provide adequate time to the objectors to study and submit replies. Therefore, the Commission should direct the Petitioners and the Discoms to send their replies to the submissions of objectors well in time, i.e., at least one week before scheduled public hearing" (ibid 3.2.2.) - in the said order of the Hon'ble Commission and from GENCO. We hope that, at least, now, the Hon'ble Commission would direct GENCO and DISCOMs to send their replies to objectors to reach them at least one week before the scheduled public hearing in the subject issue and that GENCO and DISCOMs would comply with the same.</p> | <p>In respect of True – up Petition for the control period FY 2014 – 19 & Multi – Year Tariff Filings FY 2019–24 (O.P.Nos. 5 & 6 of 2021) Hon'ble TSERC has set the timeline for receipt of suggestions/objections as 12.03.2021.</p> <p>Against the above petitions 3 Nos. of Objections/Suggestions were received from Sri. M. Venugopala Rao, Senior Journalist & Convener, Centre for Power Studies, Hyderabad on 19.2.2021, 24.02.2021 & 12.03.2021 within the time line. Replies for the above objections were communicated by TSGENCO on 15.03.2021.</p> <p>After the time line i.e., on 30.03.2021 also some more objections/suggestions were received. However, TSGENCO has arranged necessary replies before the scheduled public hearing.</p> |

Accepted
28/1/2023
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Coal & Commercial
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