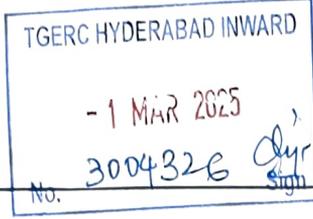


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General Secretary - Telangana State Solar Open Access Developers Association(TSOADA)

Member- Energy Committee- Federation of Chamber of Commerce of Telangana (FTCCI)



Independent Member- CGRF (Rural)- TGSPDCL

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To,

Dated:27-02-2025

(1) **The Chief Engineer(RAC)/TGSPDCL,**

Corporate Office, 1st floor, 'A' block, Mint Compound,Hyderabad-500063

(2) **The Chief Engineer (IPC & RAC)/ TGNPDCL,**

H.No.2-5-31/2, Vidyuth Bhavan, Nakkalagutta, Hanumakonda - 506001

(3) **The Secretary/TGERC,**

Vidyut Niyamtran Bhavan, Sy.No.145-P, G.T.S. Colony, Kalyan Nagar, Hyderabad 500 045

Dear Sir,

Sub: - Suggestions on the filings made by TGDISCOMs in respect of Aggregate Revenue Requirement & Tariff Proposals for Retail Supply Business for FY 2025-26 - Reg.

It is to submit that there are few practices followed by TGSPDCL that are against the provisions of the GTCS and respective Retail Supply Tariff orders:

(1) **Practices by the field offices of TGSPDCL that were against the provisions of the GTCS and respective Retail Supply Tariff orders: -**
(Practice of HT Flag)

It is to submit that, when additional loads are detected in LT cases, such cases should be dealt strictly as per Clause 12.3.3 of GTCS. Whenever there is an instantaneous increase in the load due to capacitor failure or any such other technical reasons, then as per clause 10.12.10 of RSTO for FY23-24, only such excess demand shall be billed under HT category.

However, TGSPDCL field offices had introduced a concept of HT flag, where in LT consumers are getting billed in HT category until the flag is removed, once

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his/her RMD exceeds beyond 70 KVA without checking the connected load or and continuing the LT supply for indefinite time against Clause 12.3.3 of GTCS. In addition, the process for removing the HT flag is cumbersome, requiring field offices to seek approval from head office, generally taking more than 2 months.

(2) Introduction of Concept of Actual Voltage and Specified Voltage:

Hon'ble TGERC had amended GTCS on 19.10.2022 where in it was clarified that DISCOMS shall levy the tariff **AS PER ACTUAL SUPPLY VOLTAGE**. In addition, CGRF's though various orders, have already ordered and instructed TGSPDCL to follow billing at supply voltage tariff in line with TGERC GTCS amendment.

However, even today TGSPDCL have been still following the methodology, wherein they are billing at a voltage different from supply voltage, which is illegal and arbitrary. TGSPDCL field offices have rectified billing only for the consumers, who have either approached courts/FORUMs, while following the same unauthorized method for other consumers.

In this context, I pray to the Hon'ble commission to direct the DISCOMs to rectify the above-mentioned unauthorized practices.

Thanks & Regards,



**Venkata Naresh Kumar Konakandla (Venkat),
(B.E (Anna University), M.B.A (SPJAIN), L.L.B (Osmania University))**

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