

**NAVA LIMITED**

(Formerly Nava Bharat Ventures Ltd.)

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NAVA/FIN/ 556 /2024-25

March 10, 2025

The Commission Secretary,  
Telangana State Electricity Regulatory Commission  
Vidyut Nyantran Bhavan, GST Colony, Kalyan Nagar,  
Hyderabad-500 045

Dear Sir,

Sub: Commission invites comments and suggestions on the filings made by  
TGSPDCL and TGNPDCL for their Retail Supply business for approval of  
revised ARR, FPT & CSS for FY 2025-26, Submission of our objections

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With reference to the above-mentioned subject, the Hon'ble State Commission  
has invited the objections and suggestions on the filings made by TGSPDCL and  
TGNPDCL for their Retail Supply business for approval of revised ARR, FPT &  
CSS for FY 2025-26.

While filing, in the matter of Grid Support Charges (GSC) - The licensee  
computed the rate of GSC for FY 2025-26 and proposed as 20.04 Rs/kW/Month  
on total installed capacity of the generators connected to the Grid – OA capacity  
or the PPA capacity if any with the DISCOMS) x Rate of GSC (Rs./kW/month),  
for which we strongly oppose and object the proposal of the DISCOMS on levy  
of GRID SUPPORT CHARGES.

In may please be noted that after several discussions in the Grid Coordination  
Committee, the Chairperson of the Committee (Director Grid Operations) has  
submitted final report to the Commission last year and upon the recommendation  
of the GCC, the Commission has again invited the objections and conducted  
public hearing on 8<sup>th</sup> Jan'24 and after hearing the versions of all stakeholders,  
finally, the Commission has passed the Order dated 27.03.2024.

**The Gist of the Order is as reproduced below.**

Provided that GSC cannot be levied on:

A. Captive Power Plants ( both Renewable and Conventional) which are not  
co-located.

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B. IPPs ( both Renewable and Conventional).

C. Solar Roof Top plants

D. Generators which have PPAs with TSDISCOMs.

Hence, in view of the above, the Commission is of the considered view that **GSC can be levied on captive power plants and the levy shall be limited to only the power consumed by the co-located load, formulated as below.**

Grid Support Charges (GSC) = power consumed by the co-located load x Rate of GSC (Rs./kW/month)	
Rate of GSC	Rs.15.50 per kW per month

At this stage, when the Retail Supply Tariffs are already fixed for FY 2023-24 and the Financial Year is at the fag end , the commission is not willing to determine GSC for FY 2023-24 and directs TSDISCOMs to file a separate petition for determination of GSC for FY 2024-25 onwards duly following the methodology approved in this order.

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But, contrary to the recommendation of the GCC and above findings of the Hon'ble Commission in the matter of levy of GSC vide Order dated 27.03.2024 , the DISCOMs have proposed a different formula on applicability of GSC for the FY 2025-26, is not at all acceptable.

In the matter of determination of Grid Support charges also for the FY 2025-26, we request the Hon'ble Commission to maintain the same level of charges and applicability as determined and formulated vide Order dated 27.03.2024 and 28.10.2024.

### **P R A Y E R**

**That, in view of the above, we pray that the Hon'ble Commission may be graciously pleased to**

- reject the proposal levy of Grid Support Charges as there is no such provision in the Statute/Electricity Act, whereas the STU /Transmission and Distribution Licensees are duty bound under Section 39 and 40 of the Electricity Act, 2003 and the National Electricity Policy, 2005 to provide connectivity to the CPPs like any generating station;
- In the event the Hon'ble Commission holds the proposal of GSC is valid, within the powers and jurisdiction and are leviable, please consider to maintain the same level of charges and applicability as determined and formulated vide Orders dated 27.03.2024 and 28.10.2024.





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- c) Consider our foregoing objections, grant us a personal hearing on 21.03.2025 and grant leave to adduce further evidential data in our support at the time of hearing;
- d) It is also requested to permit us to submit further submission, if any, during the course of public hearing on 21.03.2025 either by our representative or legal counsel.

Thanking you,

Yours faithfully,  
For NAVA LIMITED  
(Formerly Nava Bharat Ventures Limited)



GRK Prasad  
Executive Director