

NORTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED



**REPLIES TO
THE OBJECTIONS / SUGGESTIONS RECEIVED ON AGGREGATE
REVENUE REQUIREMENT (ARR) FOR RETAIL SUPPLY BUSINESS &
TARIFF PROPOSALS INCLUDING CSS FOR FY 2025-26**

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65	Sri.C Vijayabhaskar rao, 8/302, Sahara states, Mansoorabad, LB Nagar, Hyd-68	
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Response to Sri. M Venugopala Rao

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S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	TGSPDCL and TGNPDCL have requested the Hon'ble Commission to condone delay in filing the subject petitions, which should have been submitted by the end of November, 2024, for the reasons submitted by them in the petitions. Experience over the years is that the DISCOMs have been filing, or not filing, their annual ARR and tariff petitions in time, especially for the reason that there has been delay in government of the day permitting them to file the same. It is known that, due to intransigence of the Government of Telangana, the Discoms could not file their ARR and tariff revision proposals for the three consecutive financial years from 2019-20 to 2021-22. Again, there was abnormal delay in filing their ARR and tariff petitions for the year 2024-25, with the DISCOMs submitting the same on 18.9.2024. Needless to say, the DISCOMs do not derive any benefit by delaying filing of their ARR and tariff petitions, or other petitions, as the delay would lead to precipitating the kind of financial crisis they find themselves in, as delays in filing petitions and getting orders of the Commission would lead to delay in getting the amounts due to them, fully or partly. Earlier, the DISCOMs went on record that they "shall obtain formal approval from State Government for filing of ARR & Tariff Proposals for FY 2023-24." Such constraints of the DISCOMs in filing their petitions need to be considered in the right spirit. For dereliction of the government in permitting or directing its power utilities to prepare and file their petitions before the Commission in time, the utilities should not be held responsible.	It is to submit that the reasons for delay of filings for the ARR of FY 2025-26 are as follows. 1.As per the instructions of the Govt. the DISCOMs were in the process of preparation and finalization of Energy Policy and it was released on 11.01.2025. 2.The information on the status of upcoming new LIS projects in the state of Telangana and their energy requirement for FY 2025-26 from I&CAD is awaited. 3. Formal approval of Govt. of Telangana for filing of ARR for FY 2025-26 is awaited. 4.The Licensees had undertaken analysis of the Tariff Order of FY 2024-25 issued by Hon'ble TGERC on 28.10.2024. Further the Discoms submit that the future filings shall be done as per the Regulation No. 02 of 2023 and adhering to the timelines prescribed by TGERC Regulations.
2	Secretary of TSERC, through the circular Lr. No. TSERC/Secy/F-No.ARR2017-18/5/D.No.879/17, dated 17.02.2017, intimated the TS Discoms that, "For the above said reasons, I am directed by the Commission to require you to file tariff proposals on or before 23.02.2017 and in default, the Commission will act suo moto for determination of the tariff for FY 2017-18 in accordance with the	With reference to Suo-moto proceedings by the Hon'ble Commission, even if the Hon'ble Commission were to initiate Suo-moto proceedings in the absence of a Tariff petition, it would still rely on the actual financial and operational data provided by DISCOMs to arrive at any determination of subsequent pass through. This further

	<p>directions of the Hon'ble Appellate Tribunal for Electricity in O.P. No.1 of 2011 based on information available with the Commission in the form of ARR/FPTs for FY 2015-16 and FY 2016-17 and ARR for FY 2017-18. The Commission will reckon the information filed by licensees after commencement of the suo moto proceedings for determination of the retail supply tariff for FY 2017-18." However, experience has confirmed that the Hon'ble Commission did not take any action suo motu to initiate its regulatory process for determination of ARR and tariffs for the financial years concerned as per law and its own decision, in view of non-submission of ARR and tariff proposals by the DISCOMs in time. There has been no such instance of taking action suo motu accordingly so far.</p>	<p>reinforces the need for DISCOMs to file the petition themselves, ensuring that all relevant facts and figures are presented accurately.</p> <p>Further the TGNPDCL submit that the future filings shall be done as per the Regulation No. 02 of 2023 and adhering to the timelines prescribed by TGERC Regulations.</p>
3	<p>The DISCOMs have submitted various reasons for delay in filing the subject petitions - "As per the instructions of Govt. of Telangana, the TGDISCOMs were in the process of preparation and finalization of State Energy Policy for next 10 years. In coordination with TGREDCO, the TGDISCOMs have floated tenders for empanelment of vendors for supply and erection of Solar Power Plants up to 1 MW for self-help group (SHG) under 'Indira Mahila Shakti Program' of the Govt. of Telangana. The TGDISCOMs were in the process of floating of tenders with RFP for supply and erection of Solar Power Plants up to 4000 MW under 'Kusum Component - C.' The information on the status of upcoming new LIS projects in the state of Telangana and their energy requirement for FY 2025-26 from I&CAD is awaited. The revised scheduled CODs of YTPS and NCEs are awaited. Finalization of process for construction of new Power Plant at Ramagundam. Further, the Licensee had submitted the ARR for 5th Control Period under MYT regime from FY 2024-25 to FY 2028-29 in September 2024 and the Hon'ble Commission had released the Tariff Order on 24.10.2024. The Licensee had undertaken analysis of the tariff order released by the Hon'ble Commission and further was also developing certain proposals for the subject petition." Without going into implications of the reasons given by the DISCOMs, it can be said that some of the reasons were submitted for earlier years also and that the impact, if any, of these factors is nil or marginal for the ARR for 2025-26. That the DISCOMs</p>	<p>The Licensee could not file the Revised ARR of RSB for FY 2025-26 in view of all the reasons stated in the ARR petition not specifically w.r.t the formal approval of the GoTG. With the insufficient data available the Licensee may not be able to project the ARR of TGNPDCL for the approval of Hon'ble Commission. In order to overcome the further financial burden on account of increase in power purchase cost experienced day to day by the DISCOMs, the Licensee proposed the ARR proposal by collecting the required information without further waiting for Power Purchase True-ups.</p>

	<p>have submitted the subject petitions, without taking impact, if any, of these factors into account, also confirms this position. In any case, the DISCOMs will have the opportunity to seek true-up/true-down on variations in its expenditure and revenues that may arise due to coming into play of these factors, as well as other factors, during the next financial year. Therefore, it can be safely presumed that the government could not devote timely attention to the issue of filing of the subject petitions by the DISCOMs and give its permission or direction to file the same in time, whatever be the reasons, and that the DISCOMs have given the above-mentioned reasons for the delay to avoid the embarrassment of submitting that the delay is caused in getting the permission of the government.</p>	
4	<p>In the tariff order for 2024-25, the Hon'ble Commission has pointed out that "in case of delay in submission of tariff/true-up filings by the generating entity or licensee or SLDC, as required under this Regulation, rate of RoE shall be reduced by 0.5% per month or part thereof," under clause 20.2 of multi-year tariff regulation No.2 of 2023. The Commission has decided to impose penalties on the DISCOMs as per this regulation and directed them to adhere to the timelines as specified in the said regulation in future filing of petitions. The power utilities of GoTS have been habituated to file their petitions before the Commission with abnormal delays, mainly because of the delay in getting permission of the government to finalise and file the same. Despite the Commission imposing penalties on the DISCOMs in the form of reducing rate of RoE, as pointed out above, the DISCOMs seem to be helpless in view of dereliction of successive governments in permitting them to file petitions in time.</p>	<p>The reasons for delay filing is explained in the petition .However TGNPDCL submit that the future filings shall be done as per the Regulation No. 02 of 2023 and adhering to the timelines prescribed by TGERC Regulations.</p>
5	<p>Regarding tariff order, Electricity Act, 2023, empowers the Hon'ble Commission to "reject the application for reasons to be recorded in writing if such application is not in accordance with the provisions of this Act or the rules and regulations made thereunder or the provisions of any other law for the time being in force: Provided that an applicant shall be given a reasonable opportunity of being heard before rejecting his application" (64(4)(b)). As directed by APTEL, ERCs can take up issue of tariff determination suo motu and issue orders, if the licensees</p>	<p>With reference to Suo-moto proceedings by the Hon'ble Commission, even if the Hon'ble Commission were to initiate Suo-moto proceedings in the absence of a Tariff petition, it would still rely on the actual financial and operational data provided by DISCOMs to arrive at any determination of subsequent pass through. This further reinforces the need for DISCOMs to file the petition</p>

	do not submit the same in time for its consideration. When we raised this point in the meeting of state advisory committee of TGERC last year, the then Hon'ble member (technical), Sri M.D. Manohar Raju garu, contended that, without required information, how can the Commission act accordingly. Technically, the Commission's view is correct. Irrespective of the letter and spirit of the Act, orders of APTEL and regulations of the Commission and of the GoI and CEA, how practical problems would cause hindrances can be understood in this matter. Hon'ble Commission has powers to direct the licensees to submit information it requires. Similarly, the DISCOMs and other licensees, being entities regulated by the Commission, technically, can file their petitions in time, without waiting for consent from the government. Experience has confirmed repeatedly that they could not do so, whatever be the reasons.	themselves, ensuring that all relevant facts and figures are presented accurately.
6	That despite penalized by the Commission by way reducing rate of RoE for the period of delay in filing petitions for 2024-25, the DISCOMs are failing to adhere to the applicable regulations for filing their petitions in time is evident. In the past, the Hon'ble Commission permitted the DISCOMs to collect tariffs as per the earlier tariff order for the subsequent years for which they did not file their ARR and tariff petitions till tariff order for the FY concerned is issued. Instead of penalizing the DISCOMs by way of reducing rate of RoE for delay in submission of petitions, the Hon'ble Commission may consider allowing them to collect tariffs as per the latest past tariff order till tariff order for the FY concerned is issued, with the condition that no true-up claims of the DISCOMs would be entertained for variations in their expenditures and revenue for the period delayed and leaving the freedom to them to seek the amounts required for bridging that revenue gap from the government. If there are true-down claims, they should be considered. If necessary, the Hon'ble Commission may bring about an appropriate amendment to the regulations applicable in this regard.	Under the purview of the Honorable Commission. The Licensee will abide by the directions of the Honorable Commission.
7	We welcome the decision of the DISCOMs, obviously, with the permission of the government, for proposing no change in the tariffs for all categories for the FY 2025-26. The implication of the proposal of the DISCOMs is that the state government would provide subsidy required	In view of the commitment being assured by the GOTG during public hearing process for extending subsidy support to certain class of consumers as felt necessary by the government, it is a regulatory practice to address letter to

	to bridge their revenue gap determined by the Hon'ble Commission. However, the DISCOMs have requested the Hon'ble Commission to request the Government of Telangana to fund the proposed revenue gap to enable them to procure power for supply to it's Consumers in view of retention of existing Retail Tariff. Their request to the Commission is indicative of the kind of evasive approach they are constrained to adopt, while getting formal approval of the GoTS for filing the subject petitions. Instead of getting a commitment from the GoTS for providing required subsidy to bridge the revenue gap as may be determined by the Commission for 2025-26, as a part and parcel of the formal approval they have got from the Government, that the DISCOMs are requesting the Commission to request the GoTS to provide required subsidy is nothing but shirking their responsibility of submitting their proposals as to how they would bridge the projected revenue gap. How much subsidy is to be provided and to which categories of the consumers is the responsibility and within the purview of discretion of the GoTS, not of the Hon'ble Commission.	the Government by the Hon'ble commission after determination of Revenue gap for extending necessary subsidy support by the government for certain class of consumers before finalization of the Retail tariff. The Licensee will abide by the directions of the Honorable Commission.																
8	<p>Though no tariff hike is proposed by the DISCOMs for 2025-26, the projections made by them indicate that there is scope for imposing burdens on the consumers in the form of claims for fuel surcharge adjustment and true up later for the next financial year. Both the DISCOMs have shown a hefty revenue gap of Rs.20,151 crore for FY 2025-26 - TGSPDCL Rs.9758 crore and TGNDCL Rs.10393 crore. They have projected energy availability, requirement and surplus as hereunder:</p> <table><tr><td>DISCOM</td><td>Energy availability</td><td>Requirement</td><td>Surplus</td></tr><tr><td>SPDCL</td><td>87065 MU</td><td>71176</td><td>15889</td></tr><tr><td>NPDCL</td><td>36,566</td><td>23951</td><td>12615</td></tr><tr><td>Total</td><td>123631</td><td>95127</td><td>28504</td></tr></table> <p>As a percentage of requirement, surplus power works out to 30%. Even considering a generally accepted 5% for reserve margin or spinning reserve, availability of the projected surplus power is abnormal. The projected surplus includes short-term purchases of 1065 MU - 626</p>	DISCOM	Energy availability	Requirement	Surplus	SPDCL	87065 MU	71176	15889	NPDCL	36,566	23951	12615	Total	123631	95127	28504	<p>The surplus power shown is due to consideration of NAPAF & NAPLF of the power plants having long term PPA's and upcoming power plants. However, there is likely variation of availabilities and PLFs of the Plants. Further, the power purchase requirement has been arrived by matching hourly MW as well as the MU requirement which might lead to short-term power purchase / sale depending on MW requirement in the respective time block.</p> <p>Telangana's power demand has been also growing at rapid pace. It is evidenced by the ever increasing demand, with Telangana witnessing its highest ever demand of 16,601 MW in February 2025 from 15,623 which was achieved in March 2024. This clearly indicates that capacity augmentation works need to be kept in tune with the rapid growth in power demand which is primarily being driven by growth in service sectors. Hence it is reasonable to believe that capacities would not become idle going further.</p>
DISCOM	Energy availability	Requirement	Surplus															
SPDCL	87065 MU	71176	15889															
NPDCL	36,566	23951	12615															
Total	123631	95127	28504															

	MU by SPDCL and 439 MU by NPDCL. Even after deducting projected short-term purchases, the surplus works out to 28.84%. Despite availability of abnormal quantum of surplus power, that the DISCOMs will have to purchase 1065 MU under short-term shows the kind of imbalance between demand curve and power mix.	
9	The projected net revenue gap of Rs.20,151 crore by both the DISCOMs is worked out after deducting Rs.2768 crore claimed to accrue on sale of surplus power to the tune of 17,288 MU for SPDCL and Rs.1155 crore on sale of 7217 MU for NPDCL. Sale of surplus power is projected to be made at an average rate of Rs.5.56 per unit, whereas procurement of surplus power is worked out at a variable cost of Rs.3.96 per unit, which is the weighted average variable cost of the respective generating stations. We request the Hon'ble Commission to examine the following points, among others:	The DISCOMs proposed the Short Term purchases whenever the in the peak load time blocks if shortage comes from the existing stations as explained in above paras. However TGNPDCL abide the instructions of Hon'ble TGERC.
9 (a)	Sale of surplus power to the tune of 24,505 MU by both the DISCOMs means purchasing that power paying both fixed and variable costs as determined by the Hon'ble Commission in the retail supply tariff order. As per merit order dispatch, when surplus power is available and when it cannot be sold in the market, it has to be backed down starting from the station with highest variable cost. The DISCOMs have to pay fixed charges per unit for the power backed down from each thermal power station as applicable. Procurement of surplus power is worked out by the DISCOMs on the basis of variable cost only, without considering fixed cost. In other words, fixed cost paid for procurement of surplus power also, along with variable cost, needs to be deducted from the sale price of surplus power. To that extent, the expected revenue on account of sale of surplus power would come down. The DISCOMs have to show the fixed cost, as well as variable cost, to be paid for procurement of 24,505 MU surplus power station-wise and total.	The sale of surplus power has been determined basis the availability of the stations, and the dispatch required to meet the energy demand of the state after factoring in losses. This has also been undertaken considering Thermal MTL of 55% for the plants. As the Licensee is anyway obligated to pay fixed costs to the respective Generating Stations for dispatch to meet energy demand, the Licensee deems it fit to determine the revenue from sale of surplus power only considering the variable charges of the respective generating stations.
9 (b)	In a press note dated 6.2.2025, released in the name of the CMD of TGTRANSCO, who is the chairman of TGPCC, which looks after purchase and sale of power in the market, it is claimed that by selling surplus power in the market, from December, 2023 to January, 2025, the DISCOMs have achieved a "savings" of Rs.982.66 crore. Power available under PPAs in force can be considered surplus after meeting	The surplus power considered in the Licensee's petition is arrived at after considering dispatch to meet the energy requirement of the state. The Licensee has employed hourly MW matching based on projected hourly demand along with available generation sources. In time blocks where there is available sources excess of the projected demand, the

	<p>demand of the DISCOMs. Power required by the DISCOMs to meet demand cannot be treated as surplus power, as per the principle of merit order dispatch. Therefore, it is to be examined whether power available under PPAs in force and required by the DISCOMs to meet demand can be backed down in order to purchase power in the market and whether it is in consonance with the principle of merit order dispatch and permissible.</p>	<p>excess MW is sold to the market and in cases where the projected demand exceeds the available sources, market purchases are considered to ensure that the required demand is met. This inevitably leads to market purchases / sales to ensure that the required MW demand is met. Therefore, it can be considered that the surplus power sold, is over and above the requirements of the Licensees.</p>
9 (c)	<p>If we take one of the examples given in the above-mentioned press note, on 17.1.2025, when 43.14 MU are purchased in the exchange at an average rate of Rs.2.82 per unit, obviously, during off peak hours, the principle of merit order dispatch is not followed. The average rate for power backed down is shown as Rs.4.15 per unit. It is claimed in the press note that a sum of Rs.5.75 crore is “saved.” It is a case of backing down power required in order to purchase in the market. When power is available from thermal stations, the DISCOMs are constrained to back down it in order to purchase unwarranted, but must-run, power from the renewable energy units under PPAs in force. When surplus power backed down is available to meet demand during the period of backing down, need for purchasing power in the market or exchange, to the extent power under PPAs in force is available, does not arise.</p>	<p>As indicated in the press note, power is procured from the exchange in cases where the market cost is lesser than the VCs of the thermal generating station, thereby optimizing the power purchase cost by procuring power from the cheapest source. This exercise is technically within the domain of merit order dispatch as the plant (in this case the exchange) with the lowest price is being dispatched first. However, such backing down of thermal power to procure market power has not been considered in this filing. The Licensee proposes to procure power from the market ONLY in cases where the available sources are not adequate to meet the hourly demand.</p>
9 (d)	<p>Fixed charges for power backed down have to be paid, as applicable to the threshold level of capacity of the plant backed down, not average fixed cost. If the fixed cost of such a plant whose capacity is backed down is, say, Rs.1.50 per unit, it has to be added to the cost of Rs.2.82 per unit for which power is purchased in the market. It works out to Rs.4.32 (2.82+1.50). Compared to Rs.4.15 per unit to be paid for power backed down, an additional expenditure of Re.0.17 per unit is incurred. As such, there is no saving. When DISCOMs purchase power backed down, the question of paying additional fixed charge does not arise. Backing down a thermal power plant in order to purchase power in the market is nothing but creating avoidable surplus power.</p>	<p>Since the fixed cost is paid to the Generating companies irrespective of the quantum of energy dispatched, the fixed cost component is not factored in while comparing the market prices with the variable charges.</p>
9 (e)	<p>In addition to the above, for purchasing power in the market or exchange, if that power is supplied from outside the state, cost of inter-state transmission charges and transmission losses will be extra. Moreover, problems of ramp up and ramp down of the thermal plant</p>	<p>The Licensee will ensure that the required costs are factored in and the power purchase will be optimized to ensure lowest possible cost.</p>

	backed down, consumption of additional oil associated with ramp up, decrease in useful life span of the plant backed down, etc., will be there.	
9 (f)	If the DISCOMs cannot sell surplus power as projected, or if sale price projected varies, it will lead to variations in the cost of power purchase estimated by them.	The Licensee will take best efforts to ensure that the surplus power will be sold in the market as projected.
9 (g)	The DISCOMs have not submitted the details pertaining to thermal plants to be backed down under the principle of merit order dispatch based on their projections in the subject petitions and the fixed charges to be paid for the capacities to be backed down. They have also not submitted month-wise availability of surplus/deficit of power based on projected demand and its fluctuations and total availability of power. If availability of energy and surplus power, as projected by the DISCOMs, vary during the next financial year, it would lead to variations in the cost of power purchase estimated by them.	Backing down of the thermal plants arises at times due to variations in the demand curve to maintain grid stability. The thermal plants will be dispatched to meet the demand to maintain uninterrupted power supply duly following the Merit order dispatch principle. The Licensee is obligated to pay fixed charges approved. Further, the Licensees have considered the purchase of power from short-term sources in critical times to meet peak demand. The Licensee has also submitted the month-wise availabilities of the various generating sources in the Formats.
9 (h)	The DISCOMs have not shown costs of inter-state transmission charges and transmission losses for short-term purchases proposed, when that power is to be supplied from outside the state. Taking them into account would lead to variations in the cost of power purchase estimated by the DISCOMs.	The energy requirement for the state has been derived by grossing up the energy demand with losses. Further, the dispatch of various stations including short-term purchases is with respect to the energy requirement inclusive of losses.
9 (i)	The statistical ledgerdmain of the licensees, as explained above, distorts factual position and shows additional expenditure or loss as "savings." If the savings are achieved, as claimed in the above-mentioned press note, or can be achieved as projected in the submissions in the subject petitions, they will have to be shown in the claims of fuel surcharge adjustment for true-down later.	The Licensee will abide by the directions of the Honorable Commission.
9 (j)	This kind of statistical ledgerdmain, even if the DISCOMs are able to sell the projected surplus power in the market, would lead to increase in cost of power purchase and revenue gap of the DISCOMs and claiming the same under FSA for true-up. Conversely, revenue gap shown in the subject petitions is deflated, thereby artificially reducing need for subsidy from the government or tariff hike or both. In other words, no tariff hike now, but true-up burdens later.	The Licensee will consider to sell surplus power in the market only when the market prices are higher than the variable cost of the power plants with which PPAs are tied up with the DISCOMs.

10	<p>We request the Hon'ble Commission to direct the DISCOMs to submit the following information, examine and provide us the same, pertaining to the 4th control period and the current financial year, to enable us to study and make further submissions:</p> <p>i) Surplus power available and fixed charges paid for backing down the same.</p> <p>ii) Thermal power backed down in order to purchase must-run renewable energy and fixed charges paid for power backed down accordingly.</p> <p>iii) RE backed down and payments made for power backed down, if any.</p> <p>iv) Sales of power projected, permitted and actual.</p> <p>v) Surplus power sold, if any, and the profit or loss thereof and how it is calculated.</p> <p>vi) Additional power purchased in the market and exchanges and the tariffs paid for that vis a vis average cost of power purchase under PPAs in force and as permitted by the Commission.</p> <p>vii) True-up or true-down claims made and to be made under FSA.</p> <p>viii) Amounts collected by the DISCOMs not exceeding Re.0.30 per unit per month under FSA, as permitted by the Commission, and without considering the need for it and without public consultation.</p> <p>ix) Examination of the above factors, among others, would facilitate making a near realistic assessment and projections for the next financial year and analysing objectively remedial measures to be taken within the limitations of the regulatory role of the Hon'ble Commission and binding obligations in terms of law.</p>	<p>i. The Licensee is obligated to pay fixed charges approved irrespective of the energy dispatched.</p> <p>ii. No thermal plants have been backed down to purchase the must run RE Power as the base load is met through thermal power plants only.</p> <p>iii. No RE Power backed down due to the demand on the grid is more than the RE power generated.</p> <p>iv,v&vi) Actual sale of power and power purchase from the market during 4th control period will be submitted shortly through mail.</p> <p>viii. DISCOMs are diligently adhering to the current MYT regulations 1 of 2023 in calculating FCA and will continue do so. The TGDISCOMs written letters to the GoTG for approval for collection of FCA amount regularly every month as per the provisions in the MYT Regulation and to pay the FCA amount pertaining to AGL category.</p>
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11	In their responses to our submissions on their annual performance review of their distribution business for 2023-24 and for the 4th control period, etc., TGDISCOMs have given their accumulated losses for their retail supply business. We request the Hon'ble Commission to examine the following points, among others:	
11 (a)	SPDCL has shown a cumulative loss of Rs. 47,239.15 crore at the end of FY 2023-24 - up to 2019 Rs.24362.30 crore, Rs.4933.41 crore for 2019-20, Rs.4245.96 crore for 2020-21, Rs.629.80 crore for 2021-22, Rs.8147.48 crore for 2022-23 and Rs. 4909.53 crore for 2023-24. It has shown a revenue gap of Rs.6215.47 crore for 2023-24, after adjusting government subsidy of Rs.1349.52 crore and loss taken over by govenment under UDAY of Rs.4073 crore.	The Licensees are regularly pursuing with the Government of Telangana to collect the electricity dues and arrears. The TGNPDCL is taking the financial support under Uday scheme whenever financial losses occurred from the State Government.
11 (b)	NPDCL has shown an accumulated loss of Rs. 20,036.92 crores up to FY 2023-24. It has also shown a revenue deficit of Rs.2062.59 crore for the FY 2023-24.	
11 (c)	Both the DISCOMs have explained that the huge losses incurred by them are mainly due to increase in power purchase cost for extension of uninterrupted quality power supply to the consumers to meet the rapid load growth. SPDCL has informed that it has to receive the arrears from the government department service connections towards energy drawl. NPDCL has claimed that the cumulative loss will be overcome by getting the grants or schemes from the government as additional support.	
11 (d)	Regarding arrears, as on 30.9.2024, the DISCOMs have shown accumulated arrears to be collected to the tune of Rs. 30,777.65 crores. Both the DISCOMs have not shown arrears to be collected from the departments of the government and local bodies separately.	11(d): Arrears outstanding as on 30.09.2024 from Govt. departments and Local bodies in TGNPDCL is furnished as below: i)Govt.Departments <u>Rs. 9,579.19 Crs.</u> ii)Local bodies <u>Rs. 1,239.54 Crs.</u> Total <u>Rs.10,818.73 Crs.</u>
11 (e)	That the accumulated losses and arrears to be collected by the DISCOMs have reached an astronomical figure of Rs. 98,053.72 crore confirms the lukewarm approach and failure of the government during the last more than one decade to take remedial measures in time and adequately and nurse the DISCOMs back to financial health. This ever-intensifying precarious position of the DISCOMs also confirms the limitations and deficiencies of the regulatory role of the Commission in terms of law and practice.	

12	For net energy availability, the DISCOMs have considered a PLF of 85% and availability of hydel power as 5742 MU. However, the PLF achieved by the thermal plants of TGGENCO was very much lesser for 2023-24. We request the Hon'ble Commission to consider the following points, among others:	The Licensee has considered a normative PLF of 85% as per regulations.
12 (a)	The DISCOMs have to provide actual PLF achieved by thermal plants of TGGENCO for 2024-25 so far against 85% considered. For reasons like non-availability or non-procurement of coal to the extent allocated, actual PLF and availability of power would come down.	The Licensee has considered normative PLF of 85% for thermal plants. Further, any non-availability due to the mentioned reasons will be adjusted during the true-up/true-down filings of the Licensee.
12 (b)	The DISCOMs have submitted that, for NTECL Vallur and NLC Tamil Nadu Power Limited, to reduce the financial burden upon TGDSCOMs, the Licensees had submitted a requisition to MoP, Govt expressing their willingness to surrender the share of Telangana from NTECL Vallur and NLC Tamil Nadu Power Limited. However, MoP continues to schedule energy to Telangana from the above mentioned plants and therefore, availability for the same has been considered. From both these stations, both the DISCOMs have shown an availability of 1844 MU. In view of availability of the projected abnormal quantum of surplus power for 2025-26, with similar trend likely to continue for subsequent years, we request the Hon'ble Commission to direct the DISCOMs not to take this power from these two central generation stations, but complete the process for surrendering the same forthwith.	The DISCOMs are obligated to draw the power from NTECL Vallur and NLC Tamil Nadu Power Ltd as the said power is being scheduled to Telangana till it is reallocated to the new purchaser
12 (c)	For 4000 MW Yadadri Thermal Power Station, both the DISCOMs have shown availability of 28,295 MU and fixed charges of Rs.6858 crores for the FY 2025-26. Though the Hon'ble Commission directed TGGENCO twice, in its MYT order dated 22.3.2022 and its order dated 29.12.2023, to submit its proposal for determination of capital cost and tariff for YTPS, GENCO has not done so, so far. On what basis the DISCOMs have projected fixed charges for YTPS for the FY 2025-26 and claimed the same in the subject petitions, without getting determination of, and consent for, capital cost and tariff for the project by the Commission? What is the latest revised capital cost of YTPS? What has been hampering TGGENCO and the DISCOMs to file a	The Licensee has considered a total fixed cost of INR 6,858 Crores for YTPS station. This has been derived based on the approved fixed cost for YTPS of INR 7,218.47 Crores for FY 2025-26 (as indicated in Table 4-31 of the RST Order for 5 th Control Period released on 28.10.2024) adjusted for the commissioning dates for YTPS Unit – 4 and Unit – 5 which is expected to be 01 st May 2025 and 01 st June 2025 respectively.

	petition for determination of capital cost and tariff for YTPS by the Commission and the latter's consent for the PPA over the years?	
12 (d)	<p>The DISCOMs have not shown availability of power (or resuming supply of power) from 1000 MW Marwa project through Chattisgarh State Power Distribution Company Limited (CSPDCL) for 2025-26. Had supply of power from Chattisgarh resumed, it would have added substantially to the already available abnormal quantum of surplus power projected for 2025-26. What is the latest position of the petitions pending before appellate authorities against tariff determined by CSERC and dispute on tariffs shown in the bills for supplies made to TGDISCOMs and disputed by the latter? That the TGDISCOMs could not get till date consent of TGERC to the PPA they had signed with Chattisgarh Discom even after supply of power started in 2017-18 indicates the problematic nature of the issue. TGERC gave only interim orders dated 31.3.2017 and 23.3.2023. Are the DISCOMs paying transmission charges to PGCIL for the capacity they contracted for supply of the said power by CSPDCL, even after supply of power is stopped by the latter? If so, how much is being paid by TGDISCOMs every year towards transmission charges to PGCIL for transmission capacity contracted, but continues to be unutilised?</p>	<p>Energy dispatch from Chhattisgarh State Power Distribution Company Limited (CSPDCL) has been suspended due to ongoing disputes from FY 2022-23 and the Licensee is currently not scheduling any dispatch from CSPDCL.</p> <p>DISCOMs are not paying transmission charges to PGCIL for the capacity they contracted for supply of the said power by CSPDCL, even after supply of power is stopped</p>
12 (e)	Despite the directive given by the Hon'ble Commission to avail the share of the state in Machkund PH and Tungabhadra PH, the efforts of the DISCOMs to get PPA extended and scheduling of power from these two inter-state projects have not come to fruition.	<p>As per the Executive Director, Commercial, TGPCC, Vidyuth Soudha Hyderabad-82 vide Lr.No.ED(Comml)/SE(Comml)/ DE(STPP&Co-orn)/D.No.45,Dt:23.06.2023, The issue is continuously pursued with M/s.APGENCO for extension of PPA and scheduling of power from Machkund PH and Tungabhadra PH. The report is submitted to the Hon'ble Commission vide Lr.No. CGM (RAC)/ SE(RAC)/ DE(RAC) /F.No..C31/ D.No.215/23, Dated: 28.06.2023.</p>
12 (f)	Apart from these factors, for other factors that may come into play during the next financial year - vagaries of nature like heavy rains, floods, drought, inadequate availability of coal, problems of transportation of coal, unscheduled or forced shut-down of plants due to unforeseen technical or other reasons - projected availability of power from different stations may vary.	Noted. However, as these are unpredictable factors beyond the control of the Licensee, the same will be taken up during the true-up/true-down filings of the Licensee.

13	<p>The DISCOMs have projected availability of renewable energy to the tune of 18803.77 MU for 2025-26. As per RPPO order dated 27.2.2024, issued by the Hon'ble Commission, for the FY 2025-26, the DISCOMs have to purchase a minimum of 13% of RE as a percentage of total consumption of energy, excluding consumption met from RE and large hydel energy. Against projected sales of 87383 MU of both the DISCOMs, availability of RE and hydel energy projected is 24545.77 MU (NCE 18803.77 MU and hydel energy 5743 MU), which works out to 28.08%. In other words, both the DISCOMs will be exceeding their RPPO for next financial year by 15.08%, or by 116% of the target under RPPO fixed by the Commission. This is one of the reasons for availability of abnormal quantum of surplus power and the burden of paying fixed charges for the capacities backed down.</p>	<p>It is to submit that, the MoP, Govt of India vide Gazette dated 20.10.2023 has specified the minimum share of consumption of renewable energy by the electricity distribution licensee as a percentage of total share of energy consumption for different designated consumers (including DISCOMs as a percentage of their total share of energy consumption) under the Energy Conservation Act, 2001:</p> <p>Further, it was stipulated that any shortfall in above specified RE consumption targets shall be treated as non compliance and penalty shall be imposed as such rate specified under sub section(3) of section 26 of the said act.</p> <p>Further, MNRE vide its letter dated 01.02.2024 has communicated tentative penalty amount for each shortfall unit could amount up to Rs.3.72 per unit in not meeting the RE consumption norm, and advised DISCOMs to plan in advance to meet the aforesaid RE consumption norms specified under the Energy Conservation Act, 2001, instead of paying high penalty for non compliance.</p> <p>It is further submitted that though there is energy surplus on an annual basis, there is power deficit during many blocks during the day which has to be met through market purchases.</p> <p>Further while entering the PPAs for purchase of RE power, TGDISCOMs have examined the RPPO targets in vogue both at State level & National level.</p>
14	<p>Availability of NCE increased from 8907 MU for 2022-23, 11006 MU for 2023-24, 13399.15 MU for 2024-25 to the projected 18803.17 MU for 2025-26. Entering into long-term power purchase agreements to purchase unwarranted RE by the DISCOMs, obviously, at the behest of the government, and giving of consents to the same by TGERC are questionable and detrimental to larger consumer interest for various</p>	<p>No thermal power plants have been backed down for purchase of RE power. Due to reduction in the power purchase cost from the RE power plants, the DISCOMs are purchasing said power for optimization of power purchase cost which will help in reduction of tariff to the retail consumers..</p>

	reasons. One, the DISCOMs continue to far exceed their obligations under RPPO. Two, continuation of the trend of availability of abnormal quantum of surplus power. Three, the DISCOMs have to purchase must-run RE generated under PPAs in force, whether they require it or not. Four, In order to purchase must run RE, the DISCOMs have to back down thermal power and pay fixed charges for the capacities backed down. Five, since RE cannot meet peak demand, the DISCOMs have to purchase power in the market or through exchanges at higher prices to meet peak demand to the extent required. Six, there are several technical and financial problems of grid integration and to thermal stations backed down.	
15	The DISCOMs can sell renewable energy certificates (RECs) for the additional RE they purchase, exceeding the minimum targets fixed under RPPO order issued by the Commission. However, the DISCOMs have not shown any revenue on sale of RECs for the current and next financial years. The DISCOMs have to explain the factual position relating to sale of RECs and the revenue accrues and likely to accrue to them on account of the same.	The Licensees are exploring the different avenues for revenue enhancement under the framework of existing policies and regulations. Any additional channels will be brought in front of the Honorable Commission for approval.
16	The DISCOMs have submitted that “in coordination with TGREDCO, the TGDISCOMs have floated tenders for empanelment of vendors for supply and erection of Solar Power Plants up to 1 MW for self-help group (SHG) under “Indira Mahila Shakti Program” of the Govt. of Telangana. c. The TGDISCOMs were in the process of floating of tenders with RFP for supply and erection of Solar Power Plants upto 4000 MW under ‘Kusum Component – C.” Without going into the merits of the schemes, suffice it to say, in the context of availability of abnormal quantum of surplus for the next financial year and later, that addition of the proposed generation capacities would add to the availability of surplus power, with attendant adverse consequences. If the proposed power is to be used by the consumers or groups concerned, it would lead to reduction of demand for power and increase availability of surplus power to that extent to the DISCOMs. If the proposed power is to be purchased by the DISCOMs, it, too, would add to availability of surplus power to that extent. These moves have to be seen as a part and parcel of Telangana Clean and Green Energy Policy,	As MoP, Govt of India vide Gazette dated 20.10.2023 has specified the minimum share of consumption of renewable energy by the electricity distribution licensee as a percentage of total share of energy consumption for different designated consumers (including DISCOMs as a percentage of their total share of energy consumption) under the Energy Conservation Act, 2001, TGDISCOMs are required to procure RE power in the coming years to meet the targets fixed by MNRE. The TGDISCOMs are entrusted with the dual responsibility of not only to adhere to the various regulations/orders issued by TGERC/CERC/MNRE/MoP but also the bigger mandate enlisted in the Electricity Act 2003, to maintain reliable power supply with least cost principle. Further as the Proposed plants being established in decentralized locations, shall inject power at 11 KV level,

	<p>2025 issued by the government on 11.1.2025 wherein a target of adding 20,000 MW renewable energy and storage capacity by 2030 is fixed. The DISCOMs have also submitted that “as per the instructions of Govt. of Telangana, the TGDISCOMs were in the process of preparation and finalization of State Energy Policy for next 10 years.” If the DISCOMs or TGTRANSCO approach the Commission, seeking revision of state electricity plan, resource plan, load forecast, etc., already approved by it for the 5th control period, by incorporating the targets of clean and green energy policy or state energy policy to be prepared, we request the Hon’ble Commission to invite objections and suggestions from interested public and hold public hearings, before taking a final decision.</p>	<p>TG Discoms can avoid the CTU, STU, 33 kV losses alongside the CTU, STU charges.</p> <p>However, the Licensee will abide by the directions of the Honorable Commission.</p>
17	<p>The DISCOMs have proposed no revision in time-of-day tariffs, thereby requested the Hon’ble Commission to continue the present time-of-day charges for the next financial year. The present ToD charges are extra by Re.1 per unit for consumption from 6 AM to 10 AM and 6 PM to 10 PM and less by Rs.1.50 per unit for consumption from 10 PM to 6 AM for the categories of consumers specified in the retail supply tariff order of the Commission. We request the Hon’ble Commission to examine the following points, among others:</p>	
17 (a)	<p>If an industry is being run in three shifts of 8 hours each, there is simply no scope for it to shift its running to off peak hours. ToD cannot achieve that objective, except imposing additional burden on such industries. Such industries are already achieving a good power factor. Power intensive and continuous process industries are already in doldrums, unable to compete, with the kind of costs of inputs, including power tariffs. What would be the impact of imposition of ToD on such industries, depending on the rates of ToD, higher during peak hours and lower during off peak hours, needs to be studied. If ToD imposes additional burden on such industries, it will be the last straw on the camel’s back.</p>	<p>Implementation of ToD tariffs will help in reduction of net power tariff to the industries duly running the base loads during peak hours and shifting other loads during incentive hours.</p>
17 (b)	<p>The DISCOM's proposal is based on the notification of the MoP, GoI, for specifying ToD tariffs to all consumers having a maximum demand of more than ten Kilowatt, except agricultural consumers. As such, overwhelming majority of the domestic consumers will not come under</p>	<p>The DISCOMs have not proposed any ToD Tariff to all consumers having a maximum demand of more than ten Kilowatt. But proposed to retain the existing ToD Tariff.</p>

	its purview. But, if MoP issues another notification later for reducing the maximum demand step by step to impose ToD tariffs on domestic consumers, and if the DISCOMs meekly follow it and if the Commission applies ToD tariffs to domestic consumers, it will penalise such consumers. Determination of tariffs is within the regulatory purview of the Commission. Therefore, notifications of the MoP, Gol, should not be the basis for imposing ToD charges. The way notifications, directions and guidelines are being issued by MoP, Gol, even with mutually contradictory stances, it is evident that the overall approach of the Modi government is to ensure undue benefits to the corporate entities in power sector and impose more and more burdens on the consumers.	
17 (c)	The tariffs for consumers having a demand of more than ten Kilowatt are already exceeding their cost of service, with a provision for cross subsidy surcharge.	The cross subsidy surcharge is derived as per the NTP policy 2016 where the existing consumers opted for open access.
17 (d)	Depending upon nature of activity, commercial or manufacturing, and time of such activity, power is being consumed. To what extent time of consumption of power for such activities can be changed to reduce power consumption during peak hours or seasons and increase it during off peak hours or seasons, without affecting such activities and requirement of common man consumers, needs to be studied. Simply because MoP, Gol, has issued a notification, the states and their DISCOMs need not follow it mechanically, unmindful of consequences of its implementation, and the regulatory Commissions should not issue their orders mechanically.	The TGNPDCL abide by the directions of Hon'ble TGERC.
17 (e)	Imposition of additional burdens on industry and commerce in the form of ToD tariffs would lead to imposition of all such burdens on the consumers at large in the form of escalation of prices of commodities and services. Increase in tariffs in the form of ToD tariffs would affect purchasing power and living standards of the people at large, and, as such, they are retrogressive.	The Licensee currently has ToD tariff regime implemented for selected HT consumers. Further, in the current ARR filing, the Licensee has not to propose any tariff hikes for any of the consumer categories. In relation to that, the Licensees have decided not to alter the tariff structure or the structure for the current ARR.
17 (f)	The basis, as well as justification, for imposing ToD tariffs is not explained, because it only imposes additional burdens on the people at large, either directly or indirectly. Moreover, it is simply a measure to garner additional revenue for the DISCOMs; it need not be additional	The DISCOMs have not proposed any ToD Tariff to all consumers. But proposed to retain the existing ToD Tariff.

	profit. Imposition of ToD tariffs on higher side would lead to reduction of need for subsidy to be provided by the government. ToD is a variant of cross-subsidy surcharge.	
17 (g)	Irrespective of timings of consumption of power by various categories of consumers, the entire cost from the point of generation to supply to the end consumer, including profits of generators of power, transmission and distribution utilities and umpteen taxes, cess, etc., being imposed by the GoI and state governments and innumerable charges, especially FSA charges, being allowed by regulatory Commissions to be collected from the consumers, are being imposed on the consumers at large. As such, timings of consumption of power by different categories of consumers are not affecting the interests of the generators of power and transmission and distribution utilities.	The entire tariff procedure is followed by TGNPDCL as per the Electricity Act under section 65 and time to time regulations issued by Hon'ble TGERC.
17 (h)	Peak or off-peak consumption of power depends on requirement of power by various categories of consumers during specific hours and periods, not on any abstract principle. Hypothetically, if time of consumption varies, due to imposition of measures like ToD tariffs, so substantially that the earlier peak becomes off-peak or off-peak becomes peak, the situation would be back to square one. Of course, it is an extreme proposition.	Noted. However, variation in consumption patterns will be subsequently incorporated through changes in ToD terms of applicability.
17 (i)	The real problem is availability of abnormal quantum of surplus power, obviously, during off-peak hours and seasons. This is a result of the irrational decisions of entering into long-term PPAs with generators of power, especially of RE, to purchase unwarranted power. This is a result of the failure of the powers-that-be to take prudent decisions to ensure a harmonious balance between fluctuating demand for power and power mix to the extent technically possible. Instead of addressing this issue, protagonists of lopsided reforms are bringing forth measures like ToD tariffs.	No thermal power plants have been backed down for purchase of RE power. Due to reduction in the power purchase cost from the RE power plants, the DISCOMs are purchasing said power for optimization of power purchase cost which will help in reduction of tariff to the retail consumers.
17 (j)	To the extent period of consumption of power can be shifted from peak hours to off-peak hours by industries and commerce, need for backing down surplus power during off-peak hours and need for purchasing costly power in the market would come down. Both ways, it results in saving fixed charges which would otherwise have to be paid for backing down and higher costs which would otherwise have to be paid for	No thermal power plants have been backed down for purchase of RE power. Due to reduction in the power purchase cost from the RE power plants, the DISCOMs are purchasing said power for optimization of power purchase cost which will help in reduction of tariff to the retail consumers.

	<p>purchasing power in the market on short-term basis. If applicable tariffs are reduced in the form of ToD tariffs to such industries and commerce, to the extent they can shift their timings of consumption of power from peak hours to off-peak hours, it would be beneficial to all consumers. It is a direct benefit to such industries and commerce in terms of reducing their power bill to the extent their consumption of power is shifted to off-peak hours to the extent practicable in technical, social and economic terms. It would be a benefit to other consumers also in the form of avoidance of need for backing down surplus power and paying fixed charges to that extent and of purchase of power in the market on short-term basis at higher prices to the possible extent. Therefore, we request the Hon'ble Commission not to impose additional burden in the form of ToD, but to confine to reducing the tariff to the consumers who shift their time of consumption from peak to off peak hours, at least, to certain extent that can be met from the savings in the form of reducing need for paying fixed charges for backing down and higher tariffs for purchasing power in the market on short-term basis. It would result in prudent management of demand and supply and avoidance of additional burdens on the consumers in the form of FSA claims to the extent possible.</p>	<p>The Honorable Commission is requested to consider the Licensee's submission and take an approach as it sees fit.</p>
17 (k)	<p>As per the timings specified for applicability of ToD charges, if a consumer consumes power during the 8 hours of peak demand and during the 8 hours of off peak, he can get the benefit of reduction of tariff @Rs.0.50 per unit, provided consumption of quantum of power during both the periods is equal. It is without shifting consumption of power from peak hours to off peak hours. How is the remaining period of 8 hours from 10 AM to 6 PM is treated - neither peak, nor off peak? Since ToD charges are already being implemented, its impact in terms of shifting of time of power consumption from peak hours to off peak hours, reduction of revenue to the DISCOMs on account of reducing ToD charges to consumers for consumption during off peak hours and additional revenue to the DISCOMs on account of imposing ToD charges to consumers for consumption during peak hours needs to be examined. I request the Hon'ble Commission to direct the DISCOMs to provide the information and examine the same and make it public.</p>	<p>The Licensees proposed ToD time zones for peak, off peak and incentive hours depending on the demand on the grid to clip the peak demand and thereby reducing the purchase of power from short term sources. The Licensee will abide by the directions of the Honorable Commission.</p>

18	<p>The DISCOMs have shown 3% escalation in variable charges and 3% escalation in fixed charges for some of the power plants for calculating cost of power purchase for the FY 2025-26. If any changes take place in variable costs and fixed costs, after the Hon'ble Commission issues retail supply tariff order, the difference can be claimed under true-up or true-down. The DISCOMs are being permitted to collect not more than 30 paise per unit per month and permissible FSA claims for true-up. Escalation of variable and fixed costs presumed in advance is not permissible. We request the Hon'ble Commission to reject the 3% escalation in variable and fixed costs in advance proposed by the Discoms. As a result, the projected cost of power purchase, revenue requirement and revenue gap of the Discoms would come down.</p>	<p>The Licensee has considered a nominal escalation rate of 3% for variable cost as the actual variable cost for some of the power plants are more than approved in the GENCO MYT order. Further the Hon'ble TGERC approved the uniform Fixed Cost and Variable Cost for all years of 5th Control Period as such the TGNPDCL has proposed 3% escalation charges in CGS stations.</p>
19	<p>SPDCL and NPDCL have shown T&D losses of 10.88% (7744 MU) and 11.76% (3192 MU), respectively, for the next financial year. Average cost of power purchase per unit is Rs.5.13 for SPDCL (with power purchase cost of Rs.36530 crore for 71,176 MU) and Rs.5.17 for NPDCL (with power purchase cost of Rs. 14,042 crore for 27,143 MU). The cost of T&D losses works out to Rs.5622.94 crore - Rs.3972.672 crore for SPDCL and Rs.1650.264 for NPDCL. This shows the magnitude of, and scope for, savings that can be achieved by reducing distribution losses. Over the years there has been considerable reduction in T&D losses, with the efforts being made by TGTRANSCO and TGDISCOMs. However, distribution losses of SPDCL have been increased from 8.40% in 2022-23 to 8.55% in 2023-24. The DISCOM has explained that the increase in distribution losses is due to increase in unmetered agricultural consumption from 12126 MU in 2022-23 to 15,616 MU in 2023-24. For H1 of 2024-25, SPDCL has shown distribution losses of 8.49%. For FY 2025-26, SPDCL has projected distribution losses of 8.08% (5573 MU), against a projected growth rate of 4.41% for LT V agriculture sales.</p>	<p>It is pertaining to TGSPDCL.</p>
20	<p>Distribution losses of NPDCL increased from 8.71% in 2022-23 to 9.44% in 2023-24. The DISCOM has explained that this increase is due to increase in LT V agriculture sales from 7868 MU to 9447 MU. It has projected a growth rate of 6.56% for LT V agriculture for 2025-26 and distribution loss of 8.93%. It has projected LT V agriculture sale of</p>	<p>The TGNPDCL has been arriving the Agl. Consumption as per ISI Methodology (Indian statistical Institute) since 2013-14.</p> <p>The methodology pickedup 3170 Nos Sample DTRs from</p>

	<p>10,457 MU for 2025-26 against projected 9812 MU for 2024-25 and actual of 9447 MU for 2023-24. For H1 of 2024-25, NPDCL has not shown the actual distribution losses. Going by the logic of increase in distribution losses due to increase in agriculture sale, with all the measures proposed to be taken by the DISCOMs for reduction of distribution losses, to what extent they can reduce distribution losses for the next financial year in the face of projection of increases in LT V agriculture sales is to be seen.</p>	<p>the population of AGL DTRs.</p> <p>The sample for each stratum (KVA rating) is drawn using simple random sampling procedure.</p> <p>FY 2022-23 = 18,227.472 MU FY 2023-24 = 20,592.324 MU EHT sales during FY 2022-23 = 3081.56 MU during FY 2023-24 = 2654.09 MU % variation (decrease) = - 13.87 % Due to decrease in EHT sales and increase in LT AGL sales accumulated voltage wise losses increases.</p>																
21	<p>The DISCOMs have given intra-state transmission charges of TGTRANSCO for three years as given below:</p> <table> <tr> <td>Year</td> <td>SPDCL</td> <td>NPDCL</td> <td>TOTAL</td> </tr> <tr> <td>2023-24 actuals</td> <td>2670 cr.</td> <td>1126</td> <td>3796</td> </tr> <tr> <td>2024-25 approved</td> <td>2202</td> <td>919</td> <td>3121</td> </tr> <tr> <td>2025-26 projections</td> <td>1468</td> <td>613</td> <td>2081</td> </tr> </table> <p>The DISCOMs have not explained the reasons for substantial reduction in intra-state transmission charges for 2025-26, in the light of increasing contracted transmission capacity. Does this mean, for the current and last financial years, the DISCOMs have paid excess charges to TGTRANSCO? Has this vast variation anything to do with the inter-state transmission charges being fixed by CERC irrationally and unfairly under GNA? If the intra-state transmission charges paid for the last and current financial years are inflated, are the excess amounts refunded to the DISCOMs? SLDC charges also are projected to increase substantially. SPDCL has projected SLDC charges to increase from Rs.39 crore for 2024-25 to Rs.54 crore for 2025-26 and NPDCL from Rs.16 crore to Rs.22 crore for the same years. We are sure the Hon'ble Commission would examine these and other relevant factors, while considering petitions of TRANSCO and SLDC for their ARR and tariffs for their transmission and SLDC business for 2025-26</p>	Year	SPDCL	NPDCL	TOTAL	2023-24 actuals	2670 cr.	1126	3796	2024-25 approved	2202	919	3121	2025-26 projections	1468	613	2081	<p>The Licensee has considered the intra-state transmission charges as per the "ARR proposed revised transmission tariff and charges for FY 2025-26 and True up for FY 2023-24 for transmission business" and SLDC charges as per the "Filing of Annual Tariff Petition for FY 2025-26 for SLDC business" filed by TGTRANSCO in front of the Honorable Commission in January 2025.</p>
Year	SPDCL	NPDCL	TOTAL															
2023-24 actuals	2670 cr.	1126	3796															
2024-25 approved	2202	919	3121															
2025-26 projections	1468	613	2081															

	and submissions made and to be made during public hearing scheduled next month and take appropriate decisions to factor the permissible amounts in the ARR of the DISCOMs for the next financial year.																	
22.	<p>The DISCOMs have projected transmission losses under PGCIL network external to state transmission network to the tune of 3.54% for FY 2025-26, as is the case for 2024-25, as per the ARR of retail supply business order approved for the 5th control period by the Commission. We request the Hon'ble Commission to examine the following points, among others:</p> <p>a) Purchases in the market or through exchanges are coming down, as given by the DISCOMs, for the last, current and next financial years:</p> <table><tr><td>Year</td><td>SPDCL</td><td>NPDCL</td><td>TOTAL</td></tr><tr><td>2023-24</td><td>11,200 MU</td><td>4798</td><td>15,998</td></tr><tr><td>2024-25</td><td>520</td><td>1405</td><td>1925</td></tr><tr><td>2025-26</td><td>626</td><td>439</td><td>1065</td></tr></table> <p>PGCIL transmission losses were 3.58% for the FY 2023-24, when market purchases made by both the DISCOMs were 15,998 MU. In view of market purchases claimed to be coming down drastically – a welcome feature - for the current and next financial years, reduction of PGCIL transmission losses to the tune of just 0.04% is unrealistic and needs to be reduced further. Actual PGCIL losses for the current financial year may be examined.</p> <p>b) Out of the 24,505 MU both the DISCOMs have proposed to sell in the market for 2025-26, to the extent such sales are made from their share in the central generation stations outside the state, PGCIL losses for TGDISCOMs would come down, as the same will have to be borne by the purchasers.</p> <p>c) If scheduling of 1844 MU from NTECL Vallur and NLC Tamil Nadu Power Ltd. to TGDISCOMs is stopped, PGCIL losses would come down proportionately.</p>	Year	SPDCL	NPDCL	TOTAL	2023-24	11,200 MU	4798	15,998	2024-25	520	1405	1925	2025-26	626	439	1065	<p>a) The Licensee has considered PGCIL charges basis the figures approved by the Honorable Commission. Further, the Licensee will abide by the directions of the Honorable Commission.</p> <p>b) Noted. PGCIL losses have been considered only on the energy requirement of the state and the dispatch required for meeting the energy requirement. PGCIL losses have not been considered for sale of surplus power from CGS stations.</p> <p>c) The DISCOMs are obligated to draw the power from NTECL Vallur and NLC Tamil Nadu Power Ltd as the said power is being scheduled to Telangana till it is reallocated to the new purchaser.</p>
Year	SPDCL	NPDCL	TOTAL															
2023-24	11,200 MU	4798	15,998															
2024-25	520	1405	1925															
2025-26	626	439	1065															

23	<p>The DISCOMs have given their distribution network cost for the current and next financial years as given hereunder:</p> <table border="1" data-bbox="320 296 1003 400"> <thead> <tr> <th>Year</th><th>SPDCL</th><th>NPDCL</th></tr> </thead> <tbody> <tr> <td>2024-25 approved</td><td>Rs.4690 cr</td><td>3148</td></tr> <tr> <td>2025-26 projections</td><td>6015</td><td>4373</td></tr> </tbody> </table> <p>While the distribution cost of SPDCL increases by 28.25%, that of NPDCL increases by 38.19%. These increases are higher, much more so in the case of NPDCL compared to SPDCL. Since the Hon'ble Commission has completed public hearings on the ARR and wheeling charges for the distribution business of the DISCOMs for 2025-26, we are sure it would make a realistic assessment of permissible wheeling charges and factor the same in the ARR for retail supply business. Going by allocation of power between SPDCL and NPDCL in the ratio of 70.55:29.45 and proportions of sub-stations, DTRs, extent of lines laid, etc., and their expenditures for the same, the projected increases in distribution costs of the two DISCOMs and between the DISCOMs should be subjected to rigorous prudence check in terms of various relevant parameters like load at various levels of voltage, number of sub-stations, DTRs, extent of lines, number of consumers under various categories, their demand for power, scope and magnitude for getting cross subsidy and paying subsidy, geographical extent, rates at which various materials of same nature are being purchased, expenditure being incurred for execution of various works of similar nature, number of employees, costs of employees, etc.</p>	Year	SPDCL	NPDCL	2024-25 approved	Rs.4690 cr	3148	2025-26 projections	6015	4373	<p>The details pertaining to Distribution business have been submitted to the Hon'ble commission in the revised ARR filings for FY 2025-26. Further the Distribution cost is depending on various parameters and depends geographical area of both DISCOMs, category wise services and load and not in the ratio of 70.55:29.45.</p>
Year	SPDCL	NPDCL									
2024-25 approved	Rs.4690 cr	3148									
2025-26 projections	6015	4373									
24	<p>SPDCL and NPDCL have worked out cost of service for 2025-26 as Rs.7.27 and Rs.8.29 per unit and weighted average cost of power purchase as Rs.5.13 and Rs.5.17 per unit, respectively. The network costs for transmission and distribution work out to Rs.2.14 and Rs.3.12 per unit for SPDCL and NPDCL, and they constitute 29.44% and 37.64%, respectively, of their cost of service. Cost of power purchase and cost of transmission and distribution networks used to be 80:20, respectively, in the past in the ARR of DISCOMs. The ratio of cost of transmission and distribution networks in the ARR of the DISCOMs has</p>	<p>Both the Discoms in their distribution ARR filings have considered capex as per the values approved by the Hon'ble Commission in the resource plan order dated 29th December 2023. TGSPDCL has proposed only INR 50 Cr. as additional base capex towards smart meters for FY 2025-26. Hence, the objector's comment that distribution cost is disproportionately high is not valid.</p>									

	been increasing alarmingly. Apart from this, a comparative examination of various factors between the two DISCOMs is required, in view of highly disproportionate costs of transmission and distribution networks.													
25	<p>The DISCOMs have given the PGCIL charges for inter-state transmission for 2025-26, as approved by the Commission in the order dated 28.10.2024 for ARR of retail supply business for the 5th control period, as given hereunder:</p> <table> <tr> <td>Year</td><td>SPDCL</td><td>NPDCL</td></tr> <tr> <td>2023-24 actual</td><td>Rs.1714 cr.</td><td>716</td></tr> <tr> <td>2024-25 approved</td><td>1624</td><td>678</td></tr> <tr> <td>2025-26 projected</td><td>1702</td><td>711</td></tr> </table> <p>TGDISCOMs had pointed out earlier that, due to change in regime from long-term access (LTA) to general network access (GNA), the monthly inter-state transmission charges of PGCIL have been increased in December, 2023. GNA is an irrational arrangement and arbitrary and the DISCOMs are expected to resort to legal recourse questioning such arbitrary regulations and orders issued by the Central Electricity Regulatory Commission. On earlier occasions, we raised the issues relating to GNA and are not repeating the same now. DISCOMs of some of the states, especially of Tamil Nadu, have been pursuing the petitions filed in appellate authorities against the GNA orders given by CERC. What is the role of TGDISCOMs in these legal matters to protect the interests of their consumers in the light of imposing avoidable burdens in the form of increased ISTS charges under GNA by CERC?</p>	Year	SPDCL	NPDCL	2023-24 actual	Rs.1714 cr.	716	2024-25 approved	1624	678	2025-26 projected	1702	711	After enforcement of GNA regime in December 2023, the ISTS charges for Telangana state are reduced considerably.
Year	SPDCL	NPDCL												
2023-24 actual	Rs.1714 cr.	716												
2024-25 approved	1624	678												
2025-26 projected	1702	711												
26	Contracting an additional transmission capacity of 1000 MW from the central transmission utility, Power Grid Corporation of India Ltd. (PGCIL), in advance on presumed purchase of another 1000 MW from Chattisgarh is hasty and improper. Normally, transmission capacity needs to be contracted after coming to an agreement for purchase of power and getting a no objection certificate from the State Transmission Utility concerned, not before. In this case, there was no agreement for purchase of additional 1000 MW from Chattisgarh. To our query earlier - How much was the penalty paid by the DISCOMs to the CTU for cancelling the additional 1000 MW transmission capacity contracted by them and under what head the DISCOMs have shown	DISCOMs have not paid any penalty to the CTU for cancelling the additional 1000 MW transmission capacity contracted..												

	the penalty amount? – the TGDSCOMs replied that they filed petition against PGCIL on levy of relinquishment charges for the additional 1000 MW transmission capacity and the same is pending. It is learnt from reliable sources that PGCIL claimed relinquishment charges of Rs.261.31 crores, and that the petition filed by TGDSCOMs, questioning the claim of PGCIL, is pending before the Central Electricity Regulatory Commission. What is the latest position?	
27	<p>In response to the directive given by the Hon'ble Commission relating to cases of electrical accidents, NPDCL has shown that during the first half of the current financial year, against 217 electrical accidents to people, ex-gratia is sanctioned in 113 cases to the tune of Rs.5,85 crores. In 554 accidents involving animals, ex-gratia is sanctioned in 239 cases to the tune of Rs.1.1883 crore. SPDCL has not provided any information on electrical accidents and ex-gratia paid; it has simply referred to the reports it submitted to the Commission on a special drive taken up by it for removal of auto starters. Under their distribution business, too, the DISCOMs have paid Rs.192.82 crore towards ex-gratia/compensation in cases of electrical accidents during the 4th control period. It is fair that the amounts paid towards compensation/ex-gratia to victims of electrical accidents should be borne by the DISCOMs, whether they are caused due to fault of the department or otherwise. Allowing such payment of ex-gratia paid by the DISCOMs as pass-through to be collected from all their consumers by including the same in their ARR or under true-up is misplaced, as it would be tantamount to shifting the said liability of the DISCOM concerned to all its consumers. Such a stance, in practice, absolves the DISCOMs of their responsibility and liability. The successive Commissions continue to disagree with such a view expressed earlier during public hearings. Going by the hefty ARR, FSA, true-up and other charges being allowed by the Commission to be collected by the DISCOMs from their consumers, the ex-gratia/compensation being paid in cases of electrical accidents may be marginal. Nevertheless, as a matter of principle, it should not be difficult for the DISCOMs to bear the amount for paying ex-gratia/compensation in cases of electrical accidents. The consumers of the DISCOMs have been paying the expenditure being</p>	<p>As per the directions of CEA all the Divisional Engineer/Technical are Redesignated as Divisional Engineer/Technical & Safety officers with instructions to conduct special program on safety daily with the Dept. work force and with the consumers in all the villages for creating awareness on safety precautions to avoid accidents. Accordingly the quantum of accidents are reduced.</p> <p>As per the direction of TGERC exgratia is being paid to all the accidents irrespective of the cause of fault of department or otherwise.</p> <p>Further to state that all the accidents cases are being sanctioned and exgratia is being paid in all the cases. But there is delay in some of the cases for sanctioning of the exgratia amounts due to delay in receipt of legal documents such as FIR 'and a postmortem reports and in some cases the accident occurred in other division areas and becoming difficult in locating the consumers and in some _ cases the consumers are not aware of submitting the documents for exgratia amounts. But every care is being taken for collection of legal documents from consumers for sanctioning of the exgratia amount in accidents.</p>

	<p>allowed by the Commission for taking safety measures to prevent electrical accidents. Despite that, compensation/ex-gratia paid and to be paid in cases of electrical accidents is being imposed on the consumers at large, without any justification. In fact, the DISCOMs used to bear such compensation from their internal resources and rightly so. For example, in their replies, APDISCOMs stated that “the ex-gratia paid towards victims due to electrocution is being met from the internal resources of the DISCOM which is not recovered from ARR” (page 110 of RSTO for 2017-18 issued by APERC). Subsequently, APERC has been allowing the DISCOMs to collect the ex-gratia or compensation paid to victims of electrical accidents as a part and parcel of tariff and true-up, without any justification. The same position continues in Telangana also. Expenditure incurred for safety measures to prevent electrical accidents is one thing and payment of ex-gratia/compensation towards electrical accidents cannot be treated as a safety measure is quite another, because, the need for such a payment arises as a result of deficiency or failure of safety measures to prevent electrical accidents. The amounts paid year-wise indicates that there has been no perceptible improvement in reduction of electrical accidents. The data given by NPDCL also shows that in nearly 50% of cases of electrical accidents, no compensation/ex-gratia is sanctioned. The reasons for not sanctioning the same are not explained. Moreover, the number of electrical accidents in which compensation/ex-gratia is paid or not paid also needs to be examined to understand the real magnitude and nature of such accidents and responsibility for the same. We request the Hon'ble Commission to re-examine this issue and take an appropriate decision so as not to impose such compensation/ex-gratia on consumers who are not responsible for electrical accidents.</p>	
28	<p>I request the Hon'ble Commission to provide me an opportunity to make further submissions on some more issues before due date and during the scheduled public hearings after receiving and studying responses of the DISCOMs to my submissions.</p>	Under the purview of the Honourable Commission.

Response to M. Venugopala Rao

1. M. Venugopala Rao, Senior Journalist & Convener, Centre for Power Studies, H.No.1-100/MP/101, Monarch Prestige, Journalists' Colony, Serilingampally		
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>Further to our submissions dated 20.2.2025, we are submitting the following additional points for the consideration of the Hon'ble Commission in the subject petitions:</p> <p>For three consecutive years from 2019-20 to 2021-22, TGDISCOMs could not file their ARR and tariff proposals in time. There were no RSTOs for those three years. Without RSTO, the DISCOMs collected tariffs for the three years as per the RSTO for 2018-19, without prior permission of the Commission. Later, the Commission permitted the DISCOMs to collect tariffs accordingly, with retrospective effect, till new RSTO order is issued. As a result, the DISCOMs had to face larger and accumulated revenue gaps. For the year 202-23, considering petitions of the DISCOMs and submissions of objectors, the Commission issued RSTO, allowing tariff hike with an additional burden of Rs. 6078.73 crore, which is the highest impact of tariff hike in any year in the history of Telangana, after factoring a subsidy of Rs. 8221.17 crore the government agreed to provide. As a result of the failure of the then government to initiate the process for appointment of Chairmen and Members to the Commission, TSERC acted as a one-man Commission for nearly ten months up to 9th January, 2019 and became defunct for nearly ten months up to 29th October, 2019.</p>	No comments.
2	<p>The DISCOMs have not been allowed to file their petitions of true-up for variations in power purchase cost in time over the years. In fact, accumulated claims of true-up for variations in their retail supply business for a period of seven years from 2016-17 to 2022-23 (provisional) filed along with their petition for ARR and tariff revision for FY 2023-24 were considered by the Commission for a hefty sum of Rs. 12,514.57 crore for both TGSPDCL and TGNPDCL – Rs.10281.73 crore under true-up and Rs.2232.84 crore under “reversal of UDAY savings” claimed in distribution true-up – in its retail supply tariff order for 2023-24. Along with subsidy committed for retail supply business</p>	The TG Discoms have written letters to the govt. of Telangana requesting for payment of PP true ups amount as approved by the Hon'ble commission and committed by the GOTG.

	for 2023-24, GoTS committed to support the DISCOMs, without burdening the consumers, by providing the above sum of Rs. 12,514.57 crore over a period of five years. (RSTO for 2023-24: pp 115-116). The DISCOMs have to reveal how much amount GoTS has provided to them so far out of the committed amount under true-up.	
3	For balance amount, if any, for 2022-23 and true-up claims thereafter for retail supply business for subsequent years till 2024-25, the DISCOMs have not been allowed by successive governments to file their petitions for fuel cost adjustment so far. Nor have the DISCOMs been allowed to collect not more than Re. 0.30 per unit per month, through permitted by the Commission, in the CC bills so far. May be, political expediency of pre-election periods for the ruling parties of the day has overtaken regulatory compliance of the DISCOMs. The DISCOMs have to explain reasons for their non-compliance of regulatory requirements in this regard. It may be noted that petitions on claims of TGTRANSCO and TGDISCOMs for the 4 th control period are filed by them for their transmission and distribution business, because they come under true-down.	The Hon'ble commission notified new MYT regulation 2 of 2023. The DISCOMs have requested the commission for certain clarifications and amendment of certain clauses. The Hon'ble commission has not considered the request of the DISCOMs. Under new MYT regulation the DISCOMs were required to file the ARR for all 5 years of the 5th control period pertaining to Distribution business and Retail supply business which has consumed significant time. As such the DISCOMs could not file the PP True up petitions pertaining to FY 2022-23 and FY 2023-24. Further the data compilation of True ups of FY 2022-23 and FY 2023-24 is under process and these will be filed with Hon'ble TGERC.
4	For the recurring failures of the government and its DISCOMs to get the required petitions filed or to file, as the case may be, especially of ARR and tariff revision and FCA, we request the Hon'ble Commission to dispense with the FCA arrangement and collection of a certain amount per unit per month, without prior approval of the Commission, and direct the DISCOMs to incorporate their revenue gap that would arise as a result of variations in expenditure and revenue permitted by the Commission for the FY concerned, in the ARR and tariff revision they propose for the next FY, and determine permissible ARR for the next year. Such an arrangement would put an end to a number of anomalies and imbalances associated with the arrangement of FCA in vogue and failures of the DISCOMs to file their required petitions in time. We can make detailed submissions in support of this proposal as and when petitions for true-up/true-down of FCA claims due are filed by the DISCOMs for their retail supply business and the Commission takes	DISCOMs are diligently adhering to the current MYT regulations 2 of 2023 in calculating FCA and will continue to do so. If the Hon'ble commission updates/modifications to the calculation or treatment of FCA, DISCOMs shall abide by the directions of the Hon'ble Commission. The Quarterly petitions were filed before the Hon'ble commission for FY 2023-24 for post facto approval for the FCA computations, the Hon'ble commission rejected the petitions.

	them up for tis consideration through public consultation and public hearings.	
5	In response to the directive of the Commission to adhere to the timelines as specified in Regulation 2 of 2023 in future filing of petitions, that the DISCOMs have responded casually – “shall be complied” by SPDCL and “yet to be complied” by NPDCL – indicates their inability to do so and that it depends on the approach of the government.	The Licensees have strived to comply with all the requirements as per the TGERC Regulations in force. Any delayed petitions have been duly accompanied with condonation of delay petition with reasons substantiating the cause of the delay in front of the Hon’ble Commission.
6	The DISCOMs have shown interest in pension bonds to the tune of Rs.1523.44 crore – Rs.1074 crore by SPDCL and Rs.449 crores by NPDCL. This is a legacy of unbundling of the erstwhile APSEB in the undivided Andhra Pradesh, as a part of reforms, subsequent tripartite agreement for division of assets, liabilities, and personnel between generation, transmission, and distribution entities, and orders being given by the ERCs every year allowing interest on pension bonds as pass-through. After bifurcation of A.P., too, this trend has been continuing in both the Telugu States. It is a standard practice that pension funds have to be maintained from the contributions of the Management and employees and used appropriately to earn interest thereon. Since the erstwhile APSEB used those funds for other purposes, without accounting for the same, as a part and parcel of the first transfer scheme, after revaluation of assets of all the power utilities of GoAP in undivided Andhra Pradesh, the first APERC allowed interest on pension bonds to be collected from consumers and subsequent Commissions also have been following the same pattern. On my submission earlier, APERC wrote a letter to the government to consider taking over of pension liabilities by GoAP to settle the issue once for all, but there has been no response. As a part and parcel of bifurcation of A.P., power utilities of Telangana inherited those arrangements relating to pension funds and TGERC also has been following the approach of APERC to allow interest on pension bonds as pass through to be collected from consumers. It is nothing but penalising the consumers for the failures of the erstwhile APSEB and governments. That the government should take over liability of pension bonds is one of the points in the tripartite agreement. With or without	The amount indicated as interest in pension bonds here comprises of both additional pension liabilities (INR 1489.46 Crores) and water charges (INR 33.65 Crores). The same has been considered by the Licensees as per the additional pension liabilities and water charges approved by the Hon’ble Commission in Table 5-16 of the Order on True Up for FY 2022-23 and Multi Year Tariff (MYT) for FY 2024-25 to FY 2028-29 for TGGENCO dated 28.10.2024.

	that point, imposing the burdens of interest on pension bonds on the consumers is irrational and unfair. I request the Hon'ble Commission not to allow the claimed interest on pension bonds as pass through, but to direct the DISCOMs, as well as TGGenco and TGTransco, to claim the same from the government.	
7	The Hon'ble Commission directed the DISCOMs to take steps for installation of prepaid smart meters with latest technology for "all interested consumers." At the same time, the Commission also directed the DISCOMs to submit "a time-bound action plan for replacement of existing meters with prepaid smart meters with two-way communication in the interest of revenue realisation of the DISCOMs." If prepaid meters are to be installed for "all interested consumers," it is left to the discretion of the consumers. Then, where is the need for a time-bound action plan for the replacement of existing meters with prepaid smart meters?	Installation of smart meters / replacement of existing energy meters with smart meters is a measure that will bring in more efficiency in Discoms' billing and collection process. This will ultimately lead to better service delivery by Discoms and ultimately the benefit for the same will be passed on to the consumers. The Smart meters will also help the consumers to monitor their real time consumption and billing pattern. It will also help in peak load management with the participation of consumers voluntarily and avoid high power purchase cost from short term sources by the Discoms. Enabling the smart meters in the prepaid mode will help the Discoms to realize the revenue and avoid arrears.
8	In the subject petitions, responding to the directives of the Commission, SPDCL has contended that "As per the Gazette notification by the Central Electricity Authority (CEA), Ministry of Power D1.17-08-2021 it is mandatory that all the existing meters (other than Agriculture Consumers) are to be replaced with Prepaid Smart Meters with the following timelines. All electrical divisions having more than 50% consumers in urban areas with AT&C losses more than 15% in FY2019-20, other electrical divisions with AT&C losses more than 25% in FY2019-20, all Govt. Offices at Block level and above, and all industrial and commercial consumers shall be metered with Smart meters working in pre-payment mode by December 2023. All other areas shall be metered with Smart meters working in pre-payment mode by March 2025." That the DISCOMs have not complied with the notification of the CEA confirms that it is not mandatory.	
9	In their responses to the directive of the Commission, the DISCOMs have responded, inter alia, that "As per the instructions of the Hon'ble Chief Minister of Telangana, a letter Dt.12.12.2023 was addressed to the Special Chief Secretary (Energy), Govt. of Telangana requesting to address a letter to the Ministry of Power, GoI regarding concurrence of GoTG for participation of TGDISCOMs in RDSS with revised DPR,	

	as the scheme has been started in other States two years ago. The implementation of Smart Prepayment Meters will be taken up after approval by Ministry of Power, Gol for participation of TGDISCOMs in RDSS with revised DPR.” The implementation of Smart Prepayment Meters will be taken up after approval by the Ministry of Power, Gol for participation of TGDISCOMs in RDSS with the revised DPR” (RSTO for 2024-25: page 98). It is clear that the BRS government had already issued instructions to participate in the RDSS with revised DPR. Deputy Chief Minister Sri Bhatti Vikramarka is recently reported to have announced that the state would participate in the RDSS. The Commission has directed TGDISCOMs to ensure the compliance of the directives of the Commission (ibid. Page 99).							
10	The DISCOMs have submitted that, if pre-paid smart metering is to be taken up for the existing 81 lakh consumers, excluding agriculture consumers, an amount of Rs.9308.37 crore is estimated to be required for system metering under RDSS. If they do not participate in RDSS, they have to bear Rs.900 per meter, with an approximate financial commitment of Rs.729 crore, the licensees have explained. TG NPDCL has informed that, as per GO Ms No.1 dated 3.1.2016, it purchased 18812 prepaid meters for installation to government services and that 15035 meters are installed till now. The project was closed in July 2023, it has informed. Since the government is the consumer here, its direction is a consent for installation of prepaid meters to its offices. Has installation of the prepaid meters served its intended purpose of improving collection efficiency of the DISCOM by stopping the supply of power for not pre-paying amounts and resupplying power after pre-payment? What are the dues, if any, under the prepaid meters already installed? Have the DISCOMs made any cost-benefit analysis?	<p>In GO MS No.1, Dt: 03.01.2016, Energy (Budget) Department, Govt. of Telangana, it was decided that all Govt. Departments should have prepaid meters at their own cost w.e.f 1st April,2016</p> <p>As per the above GO, TGNPDCL purchased 18812 prepaid meters for installation of meters to Govt. services and 15035 meters are fixed till now. Present all meters are in Post paid mode only. The project was closed in the month of July-2023.</p> <p>At present, TGNPDCL is not procuring the prepaid meters</p>						
11	In response to the directive of the Commission to collect 100% outstanding dues from all its consumers, including government departments, regularly, NPDCL has maintained “except Government and SC & ST consumers, all other consumers are paying 100%. If that is so, for all other consumers, except government and SC & ST consumers, there would be no need to install pre-paid meters. Could	<p>TGNPDCL arrears as on 28th Feb'2025 is indicated below: (Rs.in Crs.)</p> <table border="1"> <thead> <tr> <th colspan="2">Category</th><th>Arrears</th></tr> </thead> <tbody> <tr> <td>Cat - I</td><td>LT Domestic</td><td>446.47</td></tr> </tbody> </table>	Category		Arrears	Cat - I	LT Domestic	446.47
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Cat - I	LT Domestic	446.47						

	the DISCOM give accumulated dues from consumers, category-wise? SPDCL has replied that “all the possible efforts are being made for collection of 100% outstanding dues from all the consumers,” without giving details of the outstanding dues, category-wise.	<table> <tr> <td></td><td>HT Industry</td><td>1420.41</td></tr> <tr> <td></td><td>LT Commercial</td><td>195.23</td></tr> <tr> <td>Cat - II</td><td>HT Others</td><td>83.94</td></tr> <tr> <td></td><td>LT Industrial</td><td>20.75</td></tr> <tr> <td>Cat - III</td><td>HT Railway and Bus Stations</td><td>0.77</td></tr> <tr> <td></td><td>LT Cottage Industries</td><td>0.52</td></tr> <tr> <td>Cat - IV</td><td>HT Irrigation & Agriculture and CPWS</td><td>9342.87</td></tr> <tr> <td></td><td>LT Irrigation & Agriculture</td><td>57.24</td></tr> <tr> <td>Cat - V</td><td>HT Railway Traction</td><td>3.7</td></tr> <tr> <td></td><td>LT Public Lighting</td><td>480.96</td></tr> <tr> <td>Cat - VI</td><td>HT Townships and Residential</td><td>2.26</td></tr> <tr> <td></td><td>LT General Purpose</td><td>3.17</td></tr> <tr> <td>Cat - VII</td><td>HT Temporary</td><td>18.51</td></tr> <tr> <td></td><td>LT Temporary</td><td>2.29</td></tr> <tr> <td>Cat - VIII</td><td>HT RESCO</td><td>588.6</td></tr> <tr> <td></td><td>LT EV Charging Stations</td><td>0</td></tr> <tr> <td>Cat- XI</td><td>HT EV Charging Stations</td><td>0.35</td></tr> <tr> <td></td><td>LT</td><td>1206.63</td></tr> <tr> <td>Total</td><td>HT</td><td>11461.41</td></tr> <tr> <td colspan="2">TOTAL (LT+HT)</td><td>12668.04</td></tr> </table>		HT Industry	1420.41		LT Commercial	195.23	Cat - II	HT Others	83.94		LT Industrial	20.75	Cat - III	HT Railway and Bus Stations	0.77		LT Cottage Industries	0.52	Cat - IV	HT Irrigation & Agriculture and CPWS	9342.87		LT Irrigation & Agriculture	57.24	Cat - V	HT Railway Traction	3.7		LT Public Lighting	480.96	Cat - VI	HT Townships and Residential	2.26		LT General Purpose	3.17	Cat - VII	HT Temporary	18.51		LT Temporary	2.29	Cat - VIII	HT RESCO	588.6		LT EV Charging Stations	0	Cat- XI	HT EV Charging Stations	0.35		LT	1206.63	Total	HT	11461.41	TOTAL (LT+HT)		12668.04
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12	Since we have made detailed submissions on the negative consequences of pre-paid metering system in our submissions dated 13.1.2023 on the ARR petitions of the DISCOMs for 2023-24, we are not repeating the same here. However, we request the Hon'ble Commission to examine the following points, among others:																																																													
12 (a)	Electricity Act, 2003, does not provide for mandatory installation of pre-paid meters or replacement of existing meters with pre-paid meters, without consent of the consumers. As such, notifications of the CEA, government of India, directions of the state government and	As per Section 55 of the Electricity Act, installation of appropriate metering infrastructure is within the domain of the licensee, subject to regulatory approval, and does not require explicit individual consumer consent.																																																												

	regulations of the Commission, if any, cannot have legal tenability, if they are contrary to the law. That is the reason why the Hon'ble Commission directed the DISCOMs to install prepaid meters to "all interested consumers."	<p>Installation of smart meters / replacement of existing energy meters with smart meters is a measure that will bring in more efficiency in Discoms' billing and collection process. This will ultimately lead to better service delivery by Discoms and ultimately the benefit for the same will be passed on to the consumers. The Smart meters will also help the consumers to monitor their real time consumption and billing pattern. It will also help in peak load management with the participation of consumers voluntarily and avoid high power purchase cost from short term sources by the Discoms. Enabling the smart meters in the prepaid mode will help the Discoms to realize the revenue and avoid arrears. Further this will be a logical step to undertake for Discoms for enabling demand side management initiatives for consumers in the future.</p> <p>While smart meters facilitate ToD billing, they are not a prerequisite, as ToD charges can be implemented with existing metering technology as possible.</p>
12 (b)	If the DISCOMs purchase prepaid meters, as per notifications of the CEA, MOP, Gol, direction of the state government and under RDSS, what will they do with the meters purchased, if the consumers do not give consent for installing the same? Who should bear that wasteful expenditure? Therefore, we request the Hon'ble Commission to direct the DISCOMs to ascertain voluntary willingness of the consumers for getting pre-paid meters installed and purchase the same to the extent required.	
12 (c)	We request the Hon'ble Commission to direct the DISCOMs in no uncertain terms that they can install pre-paid meters or replace existing meters with pre-paid meters to the service connections of only those consumers who give their consent for the same.	
12 (d)	For implementation of ToD charges also, smart meters may be necessary. How are the DISCOMs implementing ToD charges? If they are implementing ToD charges by installing smart meters, with a facility for metering power consumption during peak, off peak and other hours, it should be considered that ToD charges are also intended for installation of smart meters.	
12 (e)	We request the Hon'ble Commission to make it clear abundantly that installation of pre-paid smart meters is not mandatory and that it is left to the discretion and willingness of the consumers. We also request the Hon'ble Commission to direct the DISCOMs to give wide publicity accordingly to create awareness among the consumers at large well in advance before implementing the scheme.	
13	In response to the directives of the Commission to make all possible efforts to improve their internal efficiency and reduce the gap between ACS and ARR, conduct awareness programs among the consumers regarding safety standards, take steps for use of safety appliances by O&M staff to avoid accidents, bring awareness among the consumers about energy conservation measures to reduce the consumption during peak hours to optimize the power purchase, comply with	<p>NPDCL is regularly conducting awareness programmes and educating the consumers on energy saving tips, conservation of energy, reduction of their power bills by using ISI/star rated electrical appliances, LED bulbs and to get GRUHAJYOTHI free 200 units power facility etc.,</p>

	<p>standard of performance regulation, and assess the need of unblocking of RKVAH lead for KVAH billing and submit the detailed report, while NPDCL has explained the efforts it is making, without giving details of the results achieved relating to some of the issues, SPDCL's response is simply casual "shall be complied."</p>	<p>Regularly wide publicity is being arranging in newspapers and educating consumers on conservation of energy.</p> <p><u>Usage of safety equipment by O&M staff:</u></p> <p>To avoid accidents to the departmental O&M staff, safety appliances like ED rods, Non-contact volt alert meters, Helmets, safety jackets etc., are being arranged to all O&M staff.</p> <p>Further regular training programmes are being conducting to the O&M staff.</p> <p>Daily, all AE's/Operation are conducting "PEP TALK" with their O&M staff and implementing NPDCL standard safety norms and rules effectively.</p> <p>Every effort is being taken to avoid electrical accidents to the O&M staff in NPDCL.</p> <p>Further TGNPDCL has appointed as Safety officer in the cadre of Divisional engineer in each circle for conducting awareness programmes and taking suitable steps to avoid electrical accidents.</p> <p>Further, TGDISCOMs are continuously educating large consumers and industries on benefits for shifting loads to off-peak hours on various forums and align with existing TOD structures as part of its energy conservation measures to reduce the consumption during peak hours to optimize the power purchase cost.</p>
14	<p>The Hon'ble Commission has again directed the DISCOMs to explore the possibility of arriving at a consensus among its agricultural consumers regarding the hours of supply for its peak load management. Responding to the directive, TGNPDCL has submitted that it is conducting the awareness programs with the agriculture consumers regarding utilization of supply to the agriculture in day time instead of peak load hours. The consumers were motivated to remove</p>	<p>As per the directions of the Central Electricity Authority (CEA), Divisional Engineer/Technical in the Circle Office are redesignated as Divisional Engineer/Technical & Safety Officers with instructions to conduct polam Bata in all the villages and to rectify the identified defects and conduct safety awareness programmes to avoid accidents. Safety Awareness programmes are conducted with O&M Staff.</p>

	<p>the Automatic Starters to use the supply whenever required and to avoid the peak demand on the system. The DISCOM has not given any details as to how many agriculture consumers have agreed to consume power in day time, instead of peak load hours, and if agreed, how it is being implemented and to what extent their consumption during peak hours has come down. SPDCL has simply stated that it "shall be complied." The need for supply of power to agriculture throughout the day and throughout the year has been rightly questioned on various grounds when the scheme was announced by GoTS. While the directives given by the Hon'ble Commission indicates rethinking on the policy and need for changes, the responses of the DISCOMs indicate that, as long as the policy continues to be in force, it may not be possible to persuade the farmers to not consume power during peak hours. Therefore, it is for the GoTS to take appropriate decisions to ensure supply of power during day time, as desired by the farmers, and alternative ways of ensuring supply of power to agriculture to meet demand to the extent required.</p>	<p>Further providing safety appliances such as Induction testers, Hand gloves, Gumboots, Rain Coats and insisting for utilization in field and motivating them with daily pep talks by the controlling officers.</p> <p>Conducting Special programmes with Agriculture consumers and motivating to utilize LT capacitors for their Agriculture motrs and to avoid usage of Auto Starters. Further NPDCL is procuring and erecting 2 MVAR capacitor banks at 33/11 KV Substations and 600 KVAR Line capacitor banks on 11 KV feeders for reactive power compensation and all the directives of the commission are complied.</p> <p>As per the directives of Hon'ble Commission, special drive awareness programmes are being conducted in all the villages with Agriculture consumers and motivating to avoid usage of auto starters and avoiding usage of agriculture supply during peak load hours and motivating the consumers to use LT Capacitors for their agriculture motors. Further, NPDCL is procuring and erecting 2 MVAR capacitor banks at 33/11 Substations and 600 KVAR Line capacitor banks on 11 KV feeders as per necessity for reactive power compensation and for improving power factor.</p>
15	<p>In its order dated 22.6.2022 issued in O.P.No.46 of 2022, according consent to the TS DISCOMs to enter into "power usage agreements" for purchasing 1692 MW of solar power of private projects to be set up in Rajasthan, Gujarat and Tamil Nadu through the NTPC Limited under Central Public Sector Undertaking (CPSU) Scheme Phase II, the Hon'ble Commission, as well as the DISCOMs, put forth several arguments in support of the same. So is the case with order dated 26.10.2022 issued by the Commission in O.P.No.69 of 2022, according in-principle approval for procurement of a total of 2545 MW of solar power by TS DISCOMs through NTPC, NHPC and SECI.. In the reasons given for delay in filing the subject petitions, the DISCOMs have stated that they are awaiting the revised scheduled CODs of NCEs as one of the reasons. We request the Hon'ble Commission to examine the following points, among others:</p>	

15 (a)	What are the scheduled CODs of the above-mentioned plants of solar power, and of other solar power plants, if any, as per the terms of their PPAs approved by the Commission?	<div>The details of Scheduled CODs of the Solar power projects as per PPAs are as follows:</div> <table><tr><th>Category</th><th>PPA capacity (MW)</th><th>COD</th><th>Capacity in operation (MW)</th><th>Balance capacity (MW)</th><th>Revised COD</th></tr><tr><td>Solar NTPC CPSU Ph-II Tranche I&II</td><td>1692</td><td>30.12.2022 16.02.2023 07.06.2023</td><td>1673.68</td><td>18.32</td><td>By Dec 2024</td></tr><tr><td>Solar NTPC CPSU Ph-II Tranche III</td><td>1045</td><td>07.12.2021</td><td>0</td><td>1045</td><td>Between Dec 2024 and Feb 2025</td></tr><tr><td>Solar SECI ISTS Tranche IX</td><td>1000</td><td>11.06.2024 15.06.2024 10.08.2024</td><td>294.32</td><td>705.68</td><td>By Sep 2025</td></tr><tr><td>Solar NHPC CPSU Ph-II Tranche-III</td><td>500</td><td>28.03.2023</td><td>0</td><td>500</td><td>Between March 2025 and June 2026</td></tr></table>	Category	PPA capacity (MW)	COD	Capacity in operation (MW)	Balance capacity (MW)	Revised COD	Solar NTPC CPSU Ph-II Tranche I&II	1692	30.12.2022 16.02.2023 07.06.2023	1673.68	18.32	By Dec 2024	Solar NTPC CPSU Ph-II Tranche III	1045	07.12.2021	0	1045	Between Dec 2024 and Feb 2025	Solar SECI ISTS Tranche IX	1000	11.06.2024 15.06.2024 10.08.2024	294.32	705.68	By Sep 2025	Solar NHPC CPSU Ph-II Tranche-III	500	28.03.2023	0	500	Between March 2025 and June 2026
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15 (b)	Have the DISCOMs got consent of the Hon'ble Commission to extend time for achieving CODs by the said plants? If so, for what reasons and the time of extension. If not, why not, in the light of the direction given by the first TSERC to the DISCOMs not to extend time for rescheduling of CODs of the RE plants, without its consent?	The listed Solar power projects were awarded through Bidding conducted by Central Agencies SECI and IREDA in line with the Competitive Bidding guidelines issued by MoP. Accordingly, extension of SCODs have been granted by these Central Agencies in line with the directions from MNRE/MoP.																														
15 (c)	While extending time schedules for achieving CODs, have the DISCOMS bargained with the entities with whom they had PPAs to reduce the tariffs determined in the PPAs in line with the ones being discovered through competitive biddings in the country?	The listed Solar power projects were awarded through Bidding conducted by Central Agencies SECI and IREDA in line with the Competitive Bidding guidelines issued by MoP. Accordingly, extension of SCODs have been granted by these Central Agencies in line with the directions from MNRE/MoP.																														
15 (d)	By virtue of the admitted delay in setting up the above-mentioned solar power plants, in view of revised schedules for CODs, are they getting waiver of inter-state transmission charges and transmission losses, as per the applicable notification of the MoP, Gol, if those plants are being set up outside the state?	MoP, vide order dated 09.06.2023, in continuation to the Ministry of Power Order Nos. 23/12/2016-R&R dated 23.11.2021, 30.11.2021, 01.12.2022, 06.12.2022 and order No. 12/07/2023/RCM, dated 29.05.2023 issued on the waiver of Inter-State Transmission (ISTS) Charges on transmission of the electricity generated from solar and wind sources of energy, granted that the for any solar, wind and sources which is eligible for waiver of inter-state transmission charges and is having its scheduled date of commissioning on or before 30th June 2025 is granted extension of time from the commissioning by Ministry of New and Renewable Energy after careful consideration, on account of Force																														

		<p>Majeure or for delay on the part of the transmission provider in providing the transmission even after having taken the requisite steps in time; or on account of delays on the part of any Government Agency, and the power plant is commissioned before the extended date; it will get benefit of waiver of inter-state transmission charges on the transmission of electricity generated by such power plant as if the said plant had been commissioned on or before 30th June 2025.</p> <p>Provided that where a Renewable Energy generation capacity which is eligible for ISTS waiver in terms of the extant orders, is granted extension in COD by the competent authority, the commencement and the period of the LTA shall also get extended accordingly, and it will be deemed that the period of ISTS waiver is extended by the said period. Provided also such extension in Date of Commissioning (CoD) of a project shall be granted for a period of six months at a time and not more than 2 times.</p>
15 (e)	During the period when TSERC acted as a one-man Commission, due to consents sought by the DISCOMs and given by the Commission for extending time for scheduled CODs of private solar power plants, ostensibly, under terms of force majeure, in a questionable manner and without reducing the tariffs, even without calling for objections and suggestions from the interested public and without holding public hearings, the DISCOMs failed to protect their interests and those of their consumers.	MNRE/MoP has granted extension of SCODs to the above solar projects after careful consideration on account of force majeure or delay in availability of transmission connectivity.
15 (f)	Once consents are sought by the DISCOMs and given by the Commission to PPAS, adverse impact of binding obligations to purchase must-run, but unwarranted, power cannot be undone. It will take a few years to taper such adverse impact.	Keeping in view the demand requirements as well as Renewable purchase obligations to be complied, TGDISCOMs are aligning their power procurement plans. TGDISCOMs are obligated to award the must-run status granted to RE power plants.
15 (g)	If, without getting consent of the Hon'ble Commission, the DISCOMs permit extension of time for revised CODs of the said solar power plants, we request the Hon'ble Commission to direct the DISCOMs to submit their proposals for seeking consent for such extensions, call for	The listed Solar power projects were awarded through Bidding conducted by Central Agencies SECI and IREDA in line with the Competitive Bidding guidelines issued by MoP. Accordingly, extension of SCODs have been granted by

	objections and suggestions from the interested public, hold public hearings and issue its orders to protect larger consumer interest.	these Central Agencies in line with the directions from MNRE/MoP.
16	Earlier, the Hon'ble Commission gave consent to the DISCOMs to implement PM KUSUM for farmers. The DISCOMs highlighted the virtues of distributed solar generation earlier during public hearings of the Commission. In O.P.No.1 of 2023 (of TS GENCO), NPDCL had shown a saving of Re.0.76 per unit due to installation of solar power plant near load centres, instead of purchasing it from plants outside the state. What is the position of implementation of the scheme in the state so far?	As per GO MS NO. 24 Dt: 13.11.2024 GOTG accorded sanction for 4000 MW capacity under component A during the FY 2024-25. Accordingly, TGDISCOMs have submitted the petition to Hon'ble Commission seeking in-principle consent for procurement of decentralized solar power under KUSUM_-A Scheme with plant size of 0.5 MW to 2 MW. Awaiting the approval from Hon'ble commission.
17	In the subject petitions, the DISCOMs have stated that they were in the process of floating of tenders with RFP for supply and erection of Solar Power Plants up to 4000 MW under 'Kusum Component C. Have the DISCOMs made any comparative analysis of the benefits and problems between components of A, B and C of KUSUM? How is component C is more beneficial than components A and B? What is the scope for real and wider competition in the bidding process being adopted by the DISCOMs to ensure the lowest possible tariffs?	As per MNRE KUSUM Guidelines, TGDISCOMs are in the process of procuring power at the lowest possible tariff in KUSUM scheme by way of reverse bidding process in case of more than the required capacity quoted by the bidders for a particular substation for awarding the projects keeping the ERC determined rate as ceiling tariff.
18	Public-spirited administrators and experts like DrEAS Sarma garu, former secretary, ministry of power, government of India, have been stressing the need for shifting away from large centralised solar generation projects, in favour of decentralised solar facilities. In his letters addressed to the prime minister, chief ministers of the two Telugu states and senior bureaucrats concerned, he has articulated the issues. In his letter dated 25.9.2021 addressed to the PM, Sarma garu emphasised the following points, among others:	Noted. DISCOMs are exploring procuring decentralized solar power. Recently an EoI for decentralized solar under PM KUSUM A was floated by the State. The same can be accessed in the below link https://pmkusum.telangana.gov.in/TS/landing.html With the rising demand of State of Telangana on account of various initiatives/policies of Govt TGDISCOMs have already met load of 86823 MU in the FY 2023-24 itself. And for the FY 2024-25 upto 3rd quarter (until 31.12.2024) demand of 63148 MU was met. As such for meeting the load requirements TGDISCOMs have been analyzing and availing both the centralized as well as de-centralised power procurement options depending upon cost effectiveness so as to make available reliable and uninterrupted power supply.
18 (a)	While there may be some marginal economies of scale in centralised generation, around 15-20% of the electricity generated from such facilities will be lost in transmission and distribution, leading to the benefit of the scale advantage being neutralised.	
18 (b)	Centralised solar electricity generation will require land in one place at the rate of 3 to 5 acres per MW, depending on the technology to be adopted. This will impose a severe strain on the scarce land resources of the country. Even in the case of coal-based electricity generation	

	which requires around one acre of land per MW, there has been public opposition to lands being acquired for setting up power projects.	
18 (c)	Compared to centralised solar electricity generation, since solar rooftop facilities and solar irrigation pump sets are smaller in size and are dispersed regionally, the risks involved are less and are more easily manageable.	
18 (d)	In the case of large centralised solar generation plants which have an economic life of 15-20 years, once set up, the technology choices get preempted, whereas this is a field in which technologies are constantly evolving and the efficiency of conversion of solar radiation into electricity is constantly improving. In the long run, therefore, opting in favour of much smaller distributed facilities would be more prudent as they permit induction of more efficient technologies on a continuing basis.	
18 (e)	At a time when the unit cost of electricity from solar plants is falling sharply due to competition and introduction of state-of-the-art technologies, power purchase agreements (PPAs), valid for 15-20 years, entered into by the State utilities are proving to be disadvantageous in the long run, resulting in some States even trying to reopen the PPAS, a trend that could act as a disincentive to genuine investors. In the case of decentralised generation units, such a risk may be minimal, as the States can pick and choose the panel suppliers in smaller lots from time to time, as the programme expands and the technology improves.	
18 (f)	Decentralised solar generation provides an opportunity to the consumers to become equal partners in electricity generation and enable them to earn incomes from the surplus energy they generate. In the case of centralised generation plants, residential and agricultural consumers of electricity are forced to become dependent on the utilities that convey the electricity, whereas they are less dependent on the utilities, if they become electricity generators themselves. In effectively democratise electricity generation.	
18 (g)	In the case of centralised solar generation, the delivered price of electricity at the consumer-end is the cost of generation plus the cost of transmission and distribution, adjusted upwards for the T&D losses.	

	<p>On the other hand, in the case of distributed electricity generation, every unit of electricity supplied by the consumer to the utility would save for the latter, a corresponding unit of electricity purchased by the utility at the highest cost at the margin and delivered with T&D losses. Adopting an "avoided cost rate structure", it will be financially viable for the utility to pay a correspondingly higher price to the consumer at that rate. This will incentivise the consumers to set up rooftop panels and individual irrigation facilities, as it will create a new avenue of income generation for them. This will be a win-win situation for the utilities and the consumers in an equitable manner.</p>	
18 (h)	<p>Many corporate investors who have bid for setting up large centralised solar power plants are known to owe large dues to the financial institutions against the loans taken by them for other projects. The public financial institutions are already saddled with NPAs and one cannot rule out the possibility of some of the large solar projects compounding this problem further, as there is stiff competition among them to get the franchise for setting up such plants, resulting in the quoted tariffs falling below the notified benchmark tariffs. Going by their past track record, they may default on loan repayments in the future. (Copy of the letter is enclosed).</p>	
19	<p>I request the Hon'ble Commission to take a holistic view, as and when it examines the proposals of the DISCOMs for purchase of RE, especially solar and wind power, to ensure that it should not lead to imbalance between demand fluctuation and power mix and availability of avoidable quantum of surplus power to the extent technically practicable, to ensure lowest possible tariffs through real and wider competitive bidding. A cautious and gradual approach is imperative to ensure such a balance in tune with requirements of the state for power and larger interest of the consumers at large, irrespective of the policies and directions of the central and state governments which are not mandatory in terms of law.</p>	Under the purview of the Hon'ble Commission.
20	<p>I request the Hon'ble Commission to hold public hearings in both physical and virtual modes. I request the Hon'ble Commission to provide me an opportunity to make further submission in person, after receiving and studying responses of the DISCOMs during the public</p>	Under the purview of the Hon'ble Commission.

	<p>hearings. If the Hon'ble Commission holds public hearings in virtual mode also, I request to provide me a link to participate in the public hearing of the petition of NPDCL through virtual mode. We request the Hon'ble Commission to consider our earlier and above submissions, among others, and give reasoned order.</p>	
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Response to South Central Railway

South Central Railway, K Thourya, Chief Electrical Distribution Engineer, HQ Office, Electrical Department, 4 th Floor, 'C' Block, Rail Nilayam, Secundarabad – 500 025		
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	Indian Railways is a vital and largest transport organization of Government of India, have vast network for surface transport accessible to all sections of society and play important roles in economic and financial growth of the country. Railways serve the public at large and being a public utility, it should be supplied with electricity at a reasonable price which would reduce its requirement for diesel. In the process there would be saving of foreign exchange. It will also prevent upward revision of fares for transportation of passengers and goods by the Railways. If the fare for passengers & Goods is increased to offset fuel (energy) cost, it will add to overall inflation.	It is to submit that the TGDISCOMs also serve the public at large and being a public utility, the TGDISCOMs should supply electricity at a reasonable rate to all its consumers consists of domestic, commercial, industrial, Railways & Traction Agriculture etc. If the tariff for Railways is reduced, this would affect normal consumers by increasing their tariffs, thus placing a burden on those consumers. The TGDISCOMs are providing reliable and quality power supply to all its consumers duly enhancing the network covering all areas of the state since its inception. This is enabled by ensuring adequate recovery of its costs from its customers.
2	South Central Railway avails traction power through 30 TSSS at 132 kV Traction sub-stations in the state of Telangana. The total connected load is 412 MVA and total consumption of Railway traction is 11BO million units projected for the year 2024-25 and paying a substantial amount of Rs. 820 Crores to DISCOMS in Telangana state.	The South Central Railway is paying as per the approved tariffs issued by Hon'ble TGERC.
3	The Railways is a bulk consumer and pay major revenues to TGDISCOMs. Hence, the grievances of Railways are to be considered while fixing the tariff for HT-V (A) category,	The TGDISCOMs are having the responsibility of taking care of its all consumers including small and bulk consumers, and proposed the tariff by considering all the pros & cons of its consumers. Without recovery of cost incurred, the DISCOMs cannot be able to supply power to bulk consumers.
4	Government of India and state governments have taken policy decisions to encourage public/private electric road vehicles for decarbonization of transport system to reduce carbon footprint and	The TGDISCOMs are always striving to supply power at reasonable rates to its consumers in Telangana state. In the interest of its consumers,

	<p>protect the environment. Government of India (Ministry of Railways) took policy decision to electrify its entire existing Railway network over Indian Railways on fast-track mode to enrich carbon free transportation.</p> <p>The hike in electricity tariff of Railway Traction will affect the operating cost of Railways, which may result in high freight charges, commodity prices and thereby rise in inflation and burdening common man and public of all sectors. Railways is a labor-intensive department, due to rise in operating cost of Indian Railways is drastically affecting the employment generation in the organization</p>	TGDISCOMs has not proposed any tariff hikes for FY26.																
5	<p>Cost of Service for Railway Traction: The proposed Cost of service for Railway Traction is as follows:</p> <table><tr><th>Discom</th><th>Cost of Service Rs/KWH</th></tr><tr><td>TGSPDCL</td><td>5.25</td></tr><tr><td>TGNPDCL</td><td>5.36</td></tr><tr><td>Average</td><td>5.305</td></tr></table> <p>The comparison of cost of service and existing/proposed tariff for Railway traction HT-V(A) category is given below.</p> <table><tr><th>Year</th><th>COS of Discoms</th><th>Existing/Proposed Traction tariff</th><th>% Variation</th></tr><tr><td>2024-25</td><td>5.305/KWH</td><td>7.03/KVAH</td><td>33%</td></tr></table> <p>From above, it may be seen that the traction tariff is higher by 33% over cost of service which is against the provisions of National Tariff policy. The COS is being calculated in terms of KWh and energy is being charged for Railway traction in terms of KVAh.</p>	Discom	Cost of Service Rs/KWH	TGSPDCL	5.25	TGNPDCL	5.36	Average	5.305	Year	COS of Discoms	Existing/Proposed Traction tariff	% Variation	2024-25	5.305/KWH	7.03/KVAH	33%	<p>As per National Tariff Policy 2016, clause 8.3 Tariff design: Linkage of tariffs to cost of service states that tariffs are linked to Average Cost of Service and not category Cost of Service.</p> <p>However, it is to be noted that the CoS for Railway Traction of TGNPDCL is 5.36 Rs/KWH.</p> <p>The consumer expected to draw only active power from the grid and avoid to inject/draw reactive power from the grid to avoid overloading of the network.</p> <p>The existing tariff for traction service is within 20% of ACoS of state in line with national Tariff Policy 2016.</p>
Discom	Cost of Service Rs/KWH																	
TGSPDCL	5.25																	
TGNPDCL	5.36																	
Average	5.305																	
Year	COS of Discoms	Existing/Proposed Traction tariff	% Variation															
2024-25	5.305/KWH	7.03/KVAH	33%															
6	<p>National Tariff Policy: National tariff policy para 8.3 (2) states that “for achieving the objective that the tariff progressively reflects the cost of supply of electricity, the appropriate commission would notify a roadmap such that tariffs are brought within + 20% of the average cost of supply. The road map would also have intermediate milestones, based on the</p>	<p>The existing tariff for traction service is within 20% of ACoS of state in line with national Tariff Policy 2016.</p>																

	approach of a gradual reduction in cross subsidy."																				
6.1	<p>The tariffs were to be fixed within 20% of the average cost of service, From table in Para 5.0, it is noted that % difference between the average cost of service of the two DISCOMS and the traction tariff proposed is 33% more, which is in contravention to the National Tariff Policy.</p>	<p>As per National Tariff Policy 2016, clause 8.3 Tariff design: Linkage of tariffs to cost of service states that tariffs are linked to Average Cost of Service and not category Cost of Service.</p> <p>Hence the argument put forth by the objector is not valid.</p>																			
7	<p>Existing/Proposed Traction Tariff for 2025-26: Existing/proposed traction tariff with demand charges of Rs. 500/kVA and Energy Charges Rs.5.0s/kVAh, which is equivalent to Rs. 7.05/kVAh is already at very high and unreasonable for national transporter like Railways. Higher traction tariff slashes Rate of Return (ROR) for the new electrification projects and existing electrification projects which are under progress which are making them non- viable. Tariff Schedule of Hyderabad Metro Rail (HMR) and Indian Railways:</p> <table><tr><th rowspan="2">Consumer</th><th colspan="3">Existing/Proposed Tariff</th></tr><tr><th>Demand Charges Rs/KVA</th><th>Energy Charges Rs/KVAh</th><th>Average unit rate Rs/KVAh</th></tr><tr><td>HMR-HT-V(B)</td><td>500</td><td>4.95</td><td>6.93</td></tr><tr><td>Railways HT-V(A)</td><td>500</td><td>5.05</td><td>7.03</td></tr><tr><td colspan="3">% increase over HMR</td><td>1.44</td></tr></table> <p>It is evident from the preceding data that there is a 1.44% more difference in the current tariff between HMR and Railways. Further, it is worth to mention that SC Railways operates train services around the clock both during the day and at night, contributing to maintain and increase grid stability during off-peak load hours, whereas HMR operates only with a fixed load during the day and no load during the night.</p>	Consumer	Existing/Proposed Tariff			Demand Charges Rs/KVA	Energy Charges Rs/KVAh	Average unit rate Rs/KVAh	HMR-HT-V(B)	500	4.95	6.93	Railways HT-V(A)	500	5.05	7.03	% increase over HMR			1.44	<p>The marginal low cost of tariff extended to HMR is to strengthen the local transportation within urban area as the HMR requires more investment for construction of pillars and overhead traction system is higher than the investment incurred by the SCR. HMR need to pay more compensation for demolished properties in Urban area for construction of overhead traction. The Licensees have proposed the demand and energy charges with the aim of ensuring adequate cost recovery.</p>
Consumer	Existing/Proposed Tariff																				
	Demand Charges Rs/KVA	Energy Charges Rs/KVAh	Average unit rate Rs/KVAh																		
HMR-HT-V(B)	500	4.95	6.93																		
Railways HT-V(A)	500	5.05	7.03																		
% increase over HMR			1.44																		
8	<p>Electrification of more sections in Telangana: By way of electrification of Railway network in Telangana additional infrastructure will be added, resulting into faster movement of goods and passenger traffic, Ultimately there is every possibility of upcoming industries in Telangana state.</p>	<p>TGTRANSCO and TGDISCOMs have been making considerable capital investments for enhancements of the electrical network with the aim of making electricity accessible to its consumers. Therefore, the recovery of such costs is critical for the Licensees to ensure continuity of</p>																			

<p>8.1 Electrification projects recently completed:</p> <p>Electrification Projects completed in last 3 yrs.: 1070 Kms</p> <ul style="list-style-type: none"> I. Peddapalli - Nizamabad: 178 Km II. Falaknuma- Mahbubnagar Doubling with Electrification:98 Km. III. Malkajgiri – Medchal doubling with Electrification: 24 Kms. IV. Mahbubnagar – Kurnool Town: 128 Km. V. Medchal - Dharmabad : 166 Km. VI. Devarakhadra – Krishna: 65 Km VII. Janakampet – Bodhan : 27 Km. VIII. Moujali – Ghaktkesar (Quadruppling): 24 Km. IX. Kazipet – Ballaharsha (Tripling): 164 Km. x. Vikarabad – Matakunta: 79 Km. xi. Akanapet – Medak: 17 Km. xii. Kazipet – Vijayawada (Tripling): 100 Km. <p>8.2 Electrification projects under progress: 128 Km.</p> <ul style="list-style-type: none"> i. Kazipet – Balharshah (Tripling): 40 Km ii. Kazipet – Vijayawada (Tripling): 88 Km <p>8.3 Electrification projects sanctioned: 364 Km.</p> <ul style="list-style-type: none"> i. Manoharabad – Siddipet: 76 KM ii. Medchal - Dharmabad (Doubling): 160 KM iii. Mahbubnagar-Kurnool Town (Doubling): 128 Km 	<p>services and provide quality and uninterrupted supply to all of its consumers.</p>
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	<p>8.4 Electrification projects under proposal stage and yet to be sanctioned: 695 Km.</p> <ul style="list-style-type: none"> i. Siddipet – Kothapalli: 73 Km. ii. Sattupalli – Kovvur: 95 Km. iii. Manugur – Ramagundam: 200 Km. iv. Macherla – Nalgonda: 92 Km. v. Kondapalli – Kothagudem: 125 Km. vi. Kazipet – Ghatkesar: 110 Km. <p>Above New Line project sections are planned to be electrified in Telangana state. Existing high traction tariff affecting badly and not viable the upcoming electrification projects and slow down the existing projects also in Telangana state and effects the development of infrastructure works in the state of Telangana. Further, Railway Board have chosen Railway network work over Telangana region to upgrade the traction system from existing 1x25 KV system to 2x25 KV system to enhance existing carrying capacity to realize Mission 3000 MT master plan of PMO office by which connecting loads and demand will be increased resulting in increase in demand and energy consumption.</p>	
9	<p>Incentive on Prompt/early payment:</p> <p>Railways are prompt in payment of energy bills to the DISCOMs and for these, Railways certainly deserve some rebate/incentive. Reasonable rebate/incentive for prompt payment be granted as done in Odisha state. In Odisha, Railways entitled to a rebate of 1% (one percent) of the amount of monthly bill (excluding all arrears).</p>	<p>The TGDSICOMS are grateful to have such prompt consumers like Indian Railways.</p> <p>The incentive for prompt and early payment will be considered after gaining financially by the DISCOMs with the consent of Hon'ble commission.</p>
10	<p>Off peak time loads for Railway Traction:</p> <p>It is to mention that Railway traction is power intensive and loads are for passenger & goods train services which are run round the clock. There is no distinction of peak to non-peak hours. Thus Railways are improving base loads of DISCOMs and supporting the grid stability. Apart from this, Railways is maintaining higher power factor.</p>	
11	<p>Railways Planning to avail traction power through open access:</p> <p>It is brought to the kind notice of the Hon'ble commission; Indian Railways are already availing power through "Open access" in 12 states. The "Deemed Distribution Licensee" status of Railways is under</p>	<p>The Deemed Distribution Licensee status for Indian Railways was withheld by Hon'ble APTEL in its judgment.</p>

	<p>sub-judge at Hon'ble Supreme Court. However, Hon'ble Supreme Court in its interim order dated 06.05.2024, clarified that open access for Railways shall not be denied and cross subsidy and additional surcharges are not liable to pay till final order of the Hon'ble Supreme Court, however, Railways liable to pay transmission and wheeling charges. Hon'ble Supreme Court in its interim order, further stated that in case any of any DISCOMs/GENCOs refuse to grant open access to the Railways, it will be open to the Railways to file an application for contempt.</p> <p>As per Section 39, 2 (d) Indian Electricity Act-2003, STU to provide non-discriminatory open access to its transmission system for use by any consumer as and when such open access is provided by the State Commission under sub-section (2) of section 42, on payment of the transmission charges and a surcharge thereon, as may be specified by the State Commission.</p>	<p>As per the provisions in the Electricity Act 2003 under section 42(2) & 42(4) any Open Access consumer is required to pay CSS& AS determined by the Hon'ble Commission in its Tariff orders including Indian Railways.</p>
12	<p>Railways prayed: Railway traction tariff shall be on par with open access rates (average open access rate for Railways is Rs. 6.14/unit) in other states of Railways. Reasonable traction tariff for Railways may be considered to retain a bulk consumer and prompt payer like Railways. Reasonable traction tariff on par with the open access rates will further give impetus to Railway electrification projects and traction system upgradation from 1x25 kV system to 2x25 kV system over the Railway network in the state of Telangana. Railway Electrification is environment friendly, energy efficient and reduces carbon footprint, which further reduces the import burden of highspeed diesel.</p> <p>Existing high traction tariff for Railways has been affecting the ongoing Railway Electrification projects which are under progress in the state of Telangana. This will have a detrimental effect on the electrification projects and other upcoming infrastructure projects in the state of Telangana.</p> <p>in this circumstance, existing/proposed tariff by TG Discoms equivalent charges of Rs 7.03 /kVAh (with average load factor 35%) is very high,</p>	<p>In order to ensure cost recovery, the licensees request the Honorable Commission to retain the tariff as-is.</p>

	unreasonable and unjustified, Higher tariff compared to "open access" and HMR tariff, over burdens the bulk consumer like Railways.	
13	<p>Conclusion: Railway traction provides base load, maintains high power factor and save imported precious oil, apart from speedy, energy efficient and environmentally friendly public transport. Encouragement for new electrified sections for development of infrastructure in the state of Telangana and also act as growth engine for the economy of country largely. Keeping the above in view, Hon'ble commission is requested to consider and it is prayed that,</p> <p>a) The existing high traction tariff under category HT-V (A) Railway traction ,s to be reduced for the abovementioned reasons as per the provisions of National Tariff Policy, to encourage electrification projects in Telangana state,</p> <p>b) Railway Traction Tariff in line with HM& may be considered to avoid disparity, discrimination and injustice between the two public transport systems.</p> <p>c) Railway Traction tariff reduction may be considered by exempting Railways from the burden of cross subsidy surcharge by virtue of provisions contained in the National Tariff Policy issued by Ministry of Power on 28th January -2016,</p> <p>d) To give impetus to electrification of Railway network, it is requested to consider the reasonable rebate/ incentives for prompt payment of monthly energy bills,</p> <p>e) Hon'ble Commission is pleaded to consider Railways objections and requested to reduce the existing tariff schedule for Railway Traction or may be considered on par with HMR, as Railways is a bulk consumer and prompt payer of energy bills.</p>	The replies to this have already been answered above.

Response to Kiran Kumar Vempati (TGNDPCL)

Kiran Kumar Vempati (TGNDPCL), H.No.1-2-1/1, Opp. CC Bank, Sri Venkateswaraswamy Temple Road, Near MM Court Circle, Suryapet – 508 213		
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	It is accepted that both TGSPDCL and TGNDPCL have same Retail Supply Tariff. When TGSPDCL could get 13700cr revenue for 18900 MU (LT category excluding Agriculture) sales, TGNDPCL should get at par revenue for 6840MU sales. Near to 1000cr of more revenue can be achieved in this category alone. Same goes with other categories too.	The revenue generation of TGSPDCL and TGNDPCL may differ due to variations in their consumer mix and load. Therefore, the assumption that both DISCOMs would have similar revenue based solely on sales quantity is not valid. Each DISCOM's customer base and consumption patterns play a significant role in determining the actual revenue generated.
2	Total energy requirement is projected as 27143MU and average power purchase cost is shown as 5.54/KWh. This boils down to 15060cr. an increase of about 140cr is projected to total power purchase cost.	Rs. 5.54/kWh is average power purchase cost of TGDISCOMS not TGNDPCL. The TGNDPCL average power purchase cost is (15197Crs/27143 MU) Rs. 5.60/-, So no excess 140 Cr projected to total power purchase cost of TGNDPCL.
3	LT IX EV Charging stations are projected at 5% growth where as revenue projected decrease from FY 2023-24 actuals of 0.16cr to 0.11cr. In fact, growth could be even more. TGSPDCL has projected 4X growth.	The projected revenue declined following the reduction of fixed charges from Rs 50 to 0 published in last tariff order. The projected revenue decreased as a result of reduced fixed charges. As the growth expected in this category is marginal (5%) the revenue projected was reduced in TGNDPCL . TGSPDCL anticipates a significant growth of about 378.7%, driven by the continuous historical growth in this category.
4	Electrical Accidents reports details are not consistent in page (pg 85,86) 100, 101 of the pdf document. Exgratia is paid to more than sanctioned. 825 lakhs paid to 165 human beings, against sanctioned 585 lakhs to 113 human beings. Same thing goes with Animals numbers. More than 3cr exgratia paid in excess to the sanctioned amount.	Ex gratia has been paid for 165 Human Beings during FY 2024-25 in which the previous year's (FY 2023-24) sanctioned accidents were also covered and paid during the FY 2024-25 which is 52 in number. Exgratia paid for 424 Animals during FY 2024-25 in which previous year's (FY 2023-24) sanctioned

		accidents were also covered and paid during the FY 2024-25 which is 185 in number..
5	Around 50cr Rs of Customer charges are collected from about 14 lakh LT V (Agriculture), non-corporate farmers. It has been quite a long time farmers saw a direct benefit. Please kindly consider waiving this 50cr customer charges too and make Electricity for Agriculture / Farmers FREE in real sense.	It is not under purview of the TGNPDCL.
6	LT I (B) and LT 1 (C) slab structure is not available as per RST orders. Nomenclature should be consistent.	DISCOM has duly noted the comment/ suggestion.
7	For LT consumers Fixed charges supposed to be collected on Contracted Load not on Demand (RMD). Load and Demand are not same. More over fixed charges are charged at multiples of 10.	As per GCTS (General Terms and Conditions of Supply), fixed charges for LT category maximum demand recorded during the month or 80% of the contracted demand whichever is higher. Fixed charges are charged as per Retail Supply Tariffs for FY 2024-25 order released on 28.10.2024.
8	Advance meter readings are resulting in higher slab tariff billing, which is against natural principles and anti consumer billing. Electricity Supply Code or GTCS didn't have a mention to do same. I didn't find any direction / circular / regulation detailed such billing calculation.	As per Hon'ble ERC directions from the year 2016 onwards TGNPDCL adopted Days billing methodology to avoid higher slab bills on account of delayed billing. As per this methodology, if any consumer bill is issued beyond 1 month, the billing slabs (0-50, 51-100, 101-200 etc.,) will automatically expands based on no. of days for which bill was issued. Similarly, in case of advance meter reading average units are taken to decide the slab. Hence there is no anti consumer billing.

Response to M. Thimma Reddy

M. Thimma Reddy, Convenor, People's Monitoring Group on Electricity Regulation, H. No. 3-4-107/1, Plot No. 39, Radha Krishna Nagar, Attapur, Hyderabad – 500 048																								
S.No.	Summary of Objections / Suggestions			Response of the Licensee																				
1	In response to the above Public Notices we are submitting the following comments on TGDISCOMs' ARR and tariff proposals for FY 2025-26.			No comments.																				
2	According to MYT Regulation No. 2 of 2023, the ARR petition for FY 2025-26 commencing from 01.04.2025 shall be filed by distribution licensee on or before 30.11.2024. TGDISCOMs have filed Petition for determination of Revised ARR and Tariff of Retail Supply Business for FY 2025-26 on 28-01-2025. There is delay of two months in filing these petitions. TGDISCOMs have listed several reasons for delay in making these filings. An examination of the TGDISCOMs' ARR and tariff proposals shows that these reasons were not factored in to and as such this delay cannot be condoned. According to Clause 29 of the MYT Regulations 2023, "Provided that in case of delay in submission of tariff/true-up filings by the generating entity or licensee or SLDC, as required under this Regulation RoE shall be reduced by 0.5% per month or part thereof." There is a delay of two months in submitting ARR and tariff filings for the FY 2025-26. Following the Clause 29 of the MYT Regulations RoE of TGDISCOMs shall be reduced by 1%.			The DISCOMs have duly submitted the condonation of delay petition before the Hon'ble Commission stating the reasons for delay in filing of the ARR petition.																				
3.1	<p>Power requirement</p> <p>Table 1: Power requirement during FY 2025-26 according to DISCOMs' filings</p> <table><tr><td>Particulars</td><td>NPDCL</td><td>SPDCL</td><td>Total</td></tr><tr><td>Sales (MU)</td><td>23,951</td><td>63,432</td><td>87,383</td></tr><tr><td>Energy requirement (MU)</td><td>27,143</td><td>71,176</td><td>98,319</td></tr><tr><td>T&D Loss (MU)</td><td>3,192</td><td>7,744</td><td>10,936</td></tr><tr><td>T&D loss %</td><td>11.76</td><td>10.88</td><td>11.13</td></tr></table>			Particulars	NPDCL	SPDCL	Total	Sales (MU)	23,951	63,432	87,383	Energy requirement (MU)	27,143	71,176	98,319	T&D Loss (MU)	3,192	7,744	10,936	T&D loss %	11.76	10.88	11.13	The power requirement for Telangana state has increased vis-à-vis the approved numbers due to the increase in sales and corresponding increase in losses and other parameters. The Licensee has exceeded the sales approved in Resource plan for FY 2024-25 (53,270 MUs) in FY 2023-24 itself (53,379 MUs), necessitating the Licensee to project category wise sales based on the trend method and same has been used.
Particulars	NPDCL	SPDCL	Total																					
Sales (MU)	23,951	63,432	87,383																					
Energy requirement (MU)	27,143	71,176	98,319																					
T&D Loss (MU)	3,192	7,744	10,936																					
T&D loss %	11.76	10.88	11.13																					

	<p>Table 2: Power requirement during FY 2025-26 according to ERC's 5th Control Period Order</p> <table><tr><th>Particulars</th><th>NPDCL</th><th>SPDCL</th><th>Total</th></tr><tr><td>Sales (MU)</td><td>21,541</td><td>56,721</td><td>78,262</td></tr><tr><td>Energy requirement (MU)</td><td>24,201</td><td>63,087</td><td>87,288</td></tr><tr><td>T&D Loss (MU)</td><td>2,660</td><td>6,366</td><td>9,026</td></tr><tr><td>T&D loss %</td><td>11.00</td><td>10.09</td><td>10.34</td></tr></table> <p>The Commission through the Order on ARR of Retail Supply Business for 5th Control Period and Retail Supply Tariffs for FY 2024-25 of TGDISCOMs dated 28-10-2024 estimated total power requirement during FY 2025-26 to be 87,288 MU. At the same time TGDISCOMs arrived at 98,319 MU as their energy requirement during the same year. TGDISCOMs' estimate of energy requirement is 12.64% higher than that of the Commission.</p>	Particulars	NPDCL	SPDCL	Total	Sales (MU)	21,541	56,721	78,262	Energy requirement (MU)	24,201	63,087	87,288	T&D Loss (MU)	2,660	6,366	9,026	T&D loss %	11.00	10.09	10.34	
Particulars	NPDCL	SPDCL	Total																			
Sales (MU)	21,541	56,721	78,262																			
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T&D Loss (MU)	2,660	6,366	9,026																			
T&D loss %	11.00	10.09	10.34																			
3.2	T&D losses shown by TGDISCOMs are also higher than that projected by the Commission. Lower T&D losses imply lower power requirement.	The T&D losses mentioned for arriving at the energy requirement has been derived basis the LT, 11kV, 33kV, InSTS & PGCIL losses as approved by the Commission in the 5 th MYT RST Order dated 28.10.2024.																				
3.3	TGSPDCL is underestimating Open Access (OA). In the case of income from open access while it earned Rs. 19.08 Crore during the FY 2023-24 it is estimating its income under this head to be Rs. 1.19 crore only during the FY 2025-26. Under estimation of OA results in overestimation of energy requirement by DISCOMs.	N/A.																				
3.4	Requirement will also be impacted by deployment of solar power by some of the consumers. Singareni Collieries, Hyderabad Metro, and Railways are planning additions to their solar energy generation capacity. To these one has to add rooftop solar units being undertaken as a part of state as well as central govt initiatives.	Noted. Additional deployment of solar power by other entities such as SCCL, HMRL, Railways, etc. and the corresponding reduction in demand from the respective entities will be duly considered during the filing of the ARR petition for the respective year.																				
3.5	TGDISCOMs applied category wise CAGR (Compound Annual Growth Rate) trend during the last 5 years, 4 years, 3 years, 2 years, 1 year over the previous year to arrive at energy requirement during FY2025-26. But there was no proper justification for using the particular CAGR in the case of different consumer categories. For example, TGSPDCL adopted a CAGR that implies growth of more than four times in the	The CAGR considered by TGDISCOMs for FY 2025-26 are based on anticipated growth in specific sectors. For EVs, the high CAGR reflects expected rapid adoption due to government incentives, infrastructure development, and market trends. For HMR traction at 132 kV, the																				

	case of electrical vehicles during FY 2025-26. Similarly, in the case of HMR traction at 132 kV CAGR adopted is 25.57%, which is too optimistic.	optimistic CAGR is justified by planned metro network expansions, operational efficiency improvements, and urban development projects in Hyderabad. These projections are aligned with current and future growth trends.
3.6	<p>During the FY 2025-26 agriculture services are estimated to consume 10,457 MU accounting for 38.53% of energy requirement in the case of TGNPDCL and 17,124 MU accounting for 24.06% of energy requirement in the case of TGSPDCL. While TGNPDCL adopted 5 year CAGR of 6.56% TGSPDCL adopted 1 year CAGR of 4.41%. As agriculture services are not metered estimating consumption by this category has become a contentious issue. In the filings for FY 2024-25 TGDISCOMs stated that from the next year agriculture consumption would be estimated based on meters installed on segregated feeders serving agriculture services. Instead for FY 2025-26 TGDISCOMs adopted different CAGRs without recording any justification. Feeder based agriculture consumption estimation has been already taken up by AP DISCOMs. TGDISCOMs should clarify when they plan to use feeder meter based agriculture consumption estimation.</p>	<p>For FY 2025-26, TGNPDCL and TGSPDCL applied different CAGRs for agriculture services due to varying growth projections. TGNPDCL used a 5-year CAGR of 6.56%, while TGSPDCL used a 1-year CAGR of 4.41%. The higher agriculture demand in TGNPDCL's region justifies its higher CAGR.</p> <p>Further segregation of Agriculture feeders' work is proposed in the RDSS scheme. Once approved, the work will be undertaken.</p> <p>TGNPDCL using a methodology which is found to be Robust for estimation of Agricultural power consumption advised by the Indian Statistical Institute there by getting an improved and best accuracy in arriving and forecasting the agriculture power consumptions and estimations. Further a study was also conducted by ASCI in 2017 for computation of Agl. Consumption in the State of TELANGANA wherein ASCI model computed 2.9% more than the Agl. Consumption arrived by the ISI Methodology. Hence ISI methodology is consider to be Robust methodology.</p> <p>Per HP consumption as per ISI Methodology for the FY 2023-24 is 117.555 Units (9447 MU) where as 653 Nos Pure AGL Feeders per HP consumption is 117.157 units (9414.99).</p>

3.7	<p>Table 3: Electricity consumption by Lift irrigation schemes</p> <table><tr><td></td><td colspan="2">NPDCL</td><td colspan="2">SPDCL</td></tr><tr><td></td><td>Growth rate</td><td>Consumption (MU)</td><td>Growth rate</td><td>Consumption (MU)</td></tr><tr><td>11 kV</td><td>2% Manual</td><td>25</td><td>10% Manual</td><td>25</td></tr><tr><td>33 kV</td><td>2% Manual</td><td>31</td><td>30.34% 5yr CAGR</td><td>86</td></tr><tr><td>132 kV</td><td>2% Manual</td><td>1525</td><td>8% Manual</td><td>1644</td></tr><tr><td>Total</td><td></td><td>1581</td><td></td><td>1755</td></tr></table> <p>The two TGDISCOMs adopted different growth rates in estimating power consumption by lift irrigation schemes. At the same time, they did not provide any rationale for the growth rates adopted. In majority of the cases Manual growth rate is adopted as “historical CAGR is erratic” They should be having information on ground level situation of lift irrigation schemes and the same should have been explained/taken in to account.</p>		NPDCL		SPDCL			Growth rate	Consumption (MU)	Growth rate	Consumption (MU)	11 kV	2% Manual	25	10% Manual	25	33 kV	2% Manual	31	30.34% 5yr CAGR	86	132 kV	2% Manual	1525	8% Manual	1644	Total		1581		1755	<p>NPDCL and SPDCL have unique consumer profiles and varied upcoming lift irrigation schemes. The growth rates for power consumption have been determined independently for each DISCOM based on the specific characteristics of the forthcoming LIS projects. Additionally, the growth rate selection takes into account the number of pending agricultural connection applications, which differs between the two DISCOMs. By considering these factors, the DISCOMs have tailored their growth rate projections to align with the distinct circumstances and demands within their respective service areas.</p>						
	NPDCL		SPDCL																																			
	Growth rate	Consumption (MU)	Growth rate	Consumption (MU)																																		
11 kV	2% Manual	25	10% Manual	25																																		
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Total		1581		1755																																		
4.1	<p>Table 4: Power availability during FY 2025-26 (MU)</p> <table><tr><td>Source</td><td>DISCOMs’ 5th Control Period filings</td><td>TSERC Retail Supply Tariff and ARR 5th CP Order</td><td>DISCOMs’ ARR Filings 2025-26</td></tr><tr><td>GENCO Thermal</td><td>70,009</td><td>55,887</td><td>57,930</td></tr><tr><td>GENCO Hydel</td><td>5,741</td><td>5,742</td><td>5,742</td></tr><tr><td>CGS</td><td>29,477</td><td>25,436</td><td>25,148</td></tr><tr><td>NCES</td><td>17,446</td><td>17,446</td><td>18,804</td></tr><tr><td>SEIL</td><td>2,006</td><td>1,773</td><td>2,006</td></tr><tr><td>Singareni</td><td>8,936</td><td>7,916</td><td>8,935</td></tr><tr><td>Short-term</td><td>544</td><td></td><td>1,065</td></tr><tr><td>Total</td><td>1,34,159</td><td>1,14,200</td><td>1,23,630</td></tr></table> <p>TGDISCOMs in their ARR filings for the FY 2025-26 estimated availability of 1,23,630 MU of electricity. This is 9,430 MU higher than the electricity availability approved by the Commission for FY 2025-26 as a part of the Order on ARR of Retail Supply Business for 5th Control Period and Retail Supply Tariffs for FY 2024-25 of TGDISCOMs dated 28-10-2024. This includes 1,065 MU under short term procurement.</p>	Source	DISCOMs’ 5 th Control Period filings	TSERC Retail Supply Tariff and ARR 5 th CP Order	DISCOMs’ ARR Filings 2025-26	GENCO Thermal	70,009	55,887	57,930	GENCO Hydel	5,741	5,742	5,742	CGS	29,477	25,436	25,148	NCES	17,446	17,446	18,804	SEIL	2,006	1,773	2,006	Singareni	8,936	7,916	8,935	Short-term	544		1,065	Total	1,34,159	1,14,200	1,23,630	<p>The main difference between DISCOMs proposed for FY 2025-26 with TGERC approved for FY 2025-26 is as follows.</p> <ul style="list-style-type: none">● RTS (B) Station of 62.56 MW is not considered in TGGENCO Thermal.● The NTECL Valluru 103 MW and NLC Tamil Nadu Power Ltd 144 MW plants are added in FY 2025-26 proposals because the MOP continuous to schedule energy to Telengana State from CGS stations.● Neyveli Expansion I &II plants 11.96 MW is to be added in proposals of FY 2025-26 in CGS stations as approved in MYT order for FY 2025-26 in CGS stations.● Further 810 MW is added in proposals of NCEs under NTPC CPSU Ph-IITr III. <p>As such from above deviations the Power availability for FY 2025-26 is varied.</p>
Source	DISCOMs’ 5 th Control Period filings	TSERC Retail Supply Tariff and ARR 5 th CP Order	DISCOMs’ ARR Filings 2025-26																																			
GENCO Thermal	70,009	55,887	57,930																																			
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Total	1,34,159	1,14,200	1,23,630																																			

4.2	TGDISCOMs projected higher availability of power from each source compared to the levels approved by the Commission while claiming to follow the same method of normative plant availability net of auxiliary consumption.	TGDISCOMs has projected availability of power basis the NAPLF and estimated auxiliary losses for Thermal Stations along with the above reasons mentioned in above.
4.3	TGDSCOMs projected procurement of 1,065 MU through short-term sources. This is 100% higher than their projections made as a part of their submissions for 5th Control Period. The Commission did not allow short-term purchases as a part of its Order dated 28-10-2024.	Noted. The Licensee has undertaken short term power procurement on the basis of Hourly demand and available energy source to meet that demand for each hour. In peak hours and peak month the available dispatch from tied up sources is not enough to meet demand (in MW) and hence market purchase are considered to meet demand (in MW). Similarly during non-peak months, available dispatch from tied-up sources is higher than demand and the state will have surplus energy at that time the DISCOMs would sale in the market as per MOD method.
4.4	TGDISCOMs in their present filings noted their proposal to purchase power from short term sources on need-to-need basis. As the State is facing surplus power situation there shall be no place for short-term power purchases. Following the power availability and power requirements estimated by TGDISCOMs during the FY 2025-26 the state will have surplus power of 25,311 MU which is equal to 20,47% of the power availability. In such power surplus situation there shall be no place for short-term power procurement.	As highlighted above, the Licensee has undertaken short term power procurement on the basis of hourly demand. Although there may be surplus power available when considering the year as a whole, in the case of hourly blocks, there might be shortage of MW to meet the hourly demand, necessitating market purchases to meet demand in MW.
4.5	Under power availability TGDISCOMs did not include some sources. Under reasons for delay in filing ARR for FY 2025-26 TGDISCOMs included floating tenders for empanelment of vendors for supply and erection of Solar Power Plants up to 1 MW for self-help group (SHG) under “Indira Mahila Shakti Program’ of the Govt. of Telangana and floating of tenders with RFP for supply and erection of Solar Power Plants upto 4000 MW under ‘Kusum Component – C. [TGDISCOMs should take lessons from states which have already started implemented such projects. They should also provide the details and time line and status of feeder separation, which is required for feeder solarisation under KUSUM – C] TGGENCO also floated tender for 500	The Licensee has considered sources with which there are valid signed PPAs. The Licensee will also consider the mentioned sources for energy availability as and when PPAs are signed with the generating companies.

	MWh battery storage based solar power. State's RE policy envisages addition of 20,000 MW solar power by the end of 5th Control Period.	
5.1	TGDISCOMs estimated the total power purchase cost to be Rs. 50,572 Crore during the FY 2025-26 compared to the Commission's estimate of Rs. 46,836 Crore. TGDISCOMs' estimate of power purchase cost is 7.8% higher than that of the Commission.	The increase in Power Purchase Cost is to be expected as the energy requirement basis the FY26 sales projections is expected to be higher than the FY26 sales approved by the Commission. Furthermore, a 3% escalation is proposed on Fixed Costs and Variable Costs upon approval for FY 2025-26 in CGS stations (based on the approved costs for FY 2024-25 to FY 2028-29) and the costs of NTECL Vallur TPP & NLC Tamil Nadu plants is included in the proposals for FY 2025-26.
5.2	Net power purchase cost arrived at by TGDISCOMs as well as the Commission depends on revenue envisaged from sale of surplus power during the FY 2025-26. While DISCOMs projected sale of 24,505 MU of surplus power the Commission projected sale of 21,669 MU of surplus power. In the case of FY 2024-25 the Commission approved sale of 4,431 MU of surplus power. Compared to this projected surplus power sale during FY 2025-26 is nearly five times. Hitherto experience with selling surplus power is not very encouraging. Inclusion of estimated revenue from sale of surplus power only helps to show lower power purchase cost burden which in turn leads to lower or no tariff hike and lower subsidy burden on the state government. But reality will catch up at the time of true-up.	The Licensee will take best efforts to ensure that the surplus power will be sold in the market during the higher market rates than the variable cost of the plants tied up with PPAs by DISCOMs.
5.3	TGDISCOMs in their power purchase cost proposals have shown Rs. 6858 Crore as fixed cost of YTPS. They have not shown on what basis they have arrived at this figure. Until now the Commission has not approved capital cost and power purchase tariff of this plant. The Commission in the Order on Approval of Business Plan and Capital Investment Plan for MYT 5th Control Period from FY 2024-25 to FY 2028-29 for TSGENCO dated 29-12-2023 directed TSGENCO as follows, "Therefore, considering the directions given in MYT Order dated 22.03.2022 and Clause 4.2.3 & 4.2.4 of the Regulation 01 of 2019, the Commission again directs the Petitioner to submit a proposal	The Licensee has considered a total fixed cost of INR 6,858 Crores for YTPS station. This has been derived based on the approved fixed cost for YTPS of INR 7,218.47 Crores for FY 2025-26 (as indicated in Table 4-31 of the RST Order for 5 th Control Period released on 28.10.2024) adjusted for the commissioning dates for YTPS Unit – 4 and Unit – 5 which is expected to be 01 st May 2025 and 01 st June 2025 respectively.

	for determination of capital cost and tariff for YTPS before its CoD as per applicable tariff regulation for the relevant period.” (para 5.7.5). The Commission did not include YTPS in the Order on MYT for FY 2024-25 to FY 2028-29 for TGGENCO dated 28-10-2024. In this background of the Commission not approving the capital cost and power purchase tariff, inclusion of fixed costs of YTPS in the proposals is questionable.	
5.4	Variable cost of YTPS is mentioned as Rs. 3.53 per unit. This is lower than variable costs of most of the pit head plants in the state. Last year it was clarified that in the case of YTPS the price mentioned in DPR was quoted.	The Licensee has considered variable cost of INR 3.53 per unit considering the approved VC for YTPS of INR 3.43 per unit (as per Table 4-31 in the RST Order for the 5 th MYT dated 28.10.2024) escalated by 3%.
5.5	There is wide variation in variable costs of KTPS plants. While variable cost of KTPS VII is Rs. 3.80 per unit that of KTPS V is Rs. 4.41 per unit.	The Licensee has considered variable costs for TGGENCO stations basis the approved VC as indicated in Table4-31 of the RST Order for 5 th MYT dated 28.10.2024 escalated by 3%.
5.6	Regarding fixed costs of central generating stations (CGS) TGDISCOMs submitted as follows, “For FY 2025-26, the Licensee has considered the Fixed Costs approved by the Hon'ble TGERC in the Aggregate Revenue Requirement (ARR) of Retail Supply Business for 5th Control Period (FY 2024-25 to FY 2028-29) Order dated 28.10.2024 escalated by 3% to account for increased costs expected in FY 2025-26.” TGDISCOMs have not provided rationale for adopting this procedure. Fixed costs of CGS units are decided by CERC. According to TGDISCOMs' submission fixed costs of CGS units during FY 2023-24 were Rs. 2,319 Crore. The Commission approved Rs. 3,456 Crore as fixed costs of these CGS units during the FY 2024-25. The Commission approved fixed costs of CGS units during the FY 2024-25 was 49% higher than the actual fixed costs of CGS units during FY 2023-24 even though there was not much change in the installed capacity of these units. In the background of past experience fixed costs of CGS units needs to be reassessed.	The Fixed costs for Central Generating Stations have been arrived considering the Fixed Costs approved for Central Generating Stations as per Table 4-35 of the RST Tariff Order for the 5 th MYT dated 28.10.2024 escalated by a nominal 3% to account for increase in fixed costs expected for FY 2025-26, except for Vallur TPP and NLC Tamil Nadu Power Limited. For Vallur TPP and NLC Tamil Nadu Power Limited, the Fixed Cost for FY2025-26 has been projected by deriving the fixed cost for FY 2024-25 basis the monthly fixed cost actuals for H1 FY25, and the same was escalated by a nominal 3% to account for expected increase in fixed costs for the respective stations in FY 2025-26.

6.1	Table 5: ARR of TGDISCOMs for FY 2025-26 (Rs. in Cr)					The revised ARR filing for FY26 has been filed by the Licensee based on the sales projection for FY26 which is based on H1 actuals and H2 projections of FY25. Sales projections of FY 2024-25 based on the actuals of H1 of FY 2023-24. The projected energy sales has increased vis-à-vis the amount approved by the Commission and as a result, the energy requirement for the same has also increased and the Distribution cost is also increased which is arrived based on Regulation No.02 of 2023 issued by Hon'ble TGERC. Consequently the ARR has increased to account for the increased sales numbers and Distribution cost .
	Expenditure	NPDCL		SPDCL		
		Filings	Approved	Filings	Approved	
	Transmission cost	613	1001.95	1,468	2,400.26	
	Distribution cost	3,928	3,186.90	5,414	4,684.44	
	O&M expenditure	334	279.50	425	381.44	
	Non-Tariff Income	52	125.84	81	158.71	
	ARR	19,814	18,296.30	46,035	43,350.80	
The Commission had issued the Retail Supply Tariff Order for FY 2024-25 and ARR for each year of the 5th control period on 28th October 2024. In that order the Commission had approved ARR for each year of the 5th control period. TGDISCOMs in their present filings have claimed that in accordance to the regulation and above Order of the Commission the DISCOMs have computed the ARR for FY 2025-26. But there is wide variation between the ARR approved by the Commission for the FY 2025-26 as a part of 5th Control Period and the present filings by the TGDISCOMs. In the case of all expenditure items except transmission cost DISCOMs have shown higher expenditure compared to that approved by the Commission through the above MYT Order. At the same time TGDISCOMs did not provide reasons for the variations in expenditure and income figures.						
6.2	In the case of TGNPDCL while the Commission had approved Rs. 3,186.90 crore towards distribution cost the DISCOM is claiming Rs. 3,928 crore which is higher by Rs. 741 crore (23.25% higher). Similarly, in the case of TGSPDCL while the Commission had approved Rs. 4,684.44 crore towards distribution cost the DISCOM is claiming Rs. 5,414 crore which is higher by Rs. 730 crore (15.58% higher). Given this wide deviation TGDISCOMs' claims related to distribution cost for the year 2025-26 shall be thoroughly scrutinised.					The Distribution Cost indicated in the ARR filing has been derived basis the DB ARR petition filed by the Licensees vide OP Nos. 31 and 32 of 2024 which was proposed as per Regulation No.02 of 2023 issued by Hon'ble TGERC.The same is under prudence check by the Honorable Commission.
6.3	Similar is the case with respect to other expenditure items except transmission cost.					The O&M expenditure and non-tariff income is derived from the DB ARR petition filed by the Licensees vide OP Nos. 31 and 32 of 2024. The same is under prudence check by the Honorable Commission.
6.4	The TGDISCOMs have not included 1000 MW power from Chhattisgarh State Power Distribution Company Limited (CSPDCL) under availability during FY 2025-26. In the absence of power supply					No transmission charges are being paid to PGCIL for the 1000MW capacity contracted

	from this plant we would like to know whether the TGDISCOMs are paying transmission charges to PGCIL for the capacity they contracted for supply of power by CSPDCL.	with Chhattisgarh State Power Distribution Company Limited (CSPDCL).
6.5	At the same time TGDISCOMs underestimated the revenue from non-tariff income during the FY 2025-26. In the case of NPDCL the Commission estimated Rs. 125.84 Crore towards non-tariff income but NPDCL has shown only Rs. 52 Crore under this head. Similarly, in the case of SPDCL the Commission estimated Rs. 158.71 Crore towards non-tariff income but NPDCL has shown only Rs. 81 Crore under this head.	For base year of FY 2023-24, TGDISCOMs have considered the actual non-tariff income and have projected the non-tariff income for future years considering a nominal 2% escalation. The amount from recoveries from theft of power or malpractices is not considered in FY 2025-26 proposals.
6.6	Net result of this is that as shown in the above table TGDISCOMs have arrived at higher ARR compared to the ones approved by the Commission. Given this deviation from the ARR approved by the Commission DISCOMs' claims on ARR for the FY 2025-26 needs to be subjected to thorough scrutiny. This is particularly important because TGDISCOMs did not provide justification for higher expenditure over and above the limit set by the Commission.	The Licensee submits that the ARR projections have been derived basis the updated sales projections, energy requirements, and the Distribution Business filings undertaken by the Licensee basis latest available information. The scrutiny of the same is under the purview of the Honorable Commission and the Licensee shall abide by the directions of the Commission.
7.1	During the first half of FY 2024-25 NPDCL recorded 217 fatal accidents involving humans and SPDCL recorded 99 (including 2 departmental) fatal accidents involving humans. A look at the data for the past few years show that there was no let up in occurrence of fatal electrical accidents. NPDCL has not provide details of department or contract labour accidents. Exgratia for human fatal accidents provided by both DISCOMs is less than the number of human fatal accidents. It has been submitted that families of all human fatal accident victims should be provided exgratia as a humanitarian gesture through the own resources of the DISCOMs.	As per the direction of TGERC exgratia is being paid to all the accidents irrespective of the cause of accidents. But in some cases there is delay in sanctioning of exgratia due to non-submission of legal documents such as FIR and postmortem reports etc.
7.2	The information provided by TSDISOMs on electrical accidents show that most of the fatal accidents took place in circles with predominantly rural services. These accidents are low in urban circles. This implies that the rural consumers are not receiving quality service. Every step shall be taken to correct this anomaly.	As mentioned most of the accidents cases are being occurred in Rural areas. To reduce the accidents and to provide awareness to the consumers special programs such as Polam Bata and Pep . talks with consumers are being conducted by DE/Tech. and Safety Officer in all circles and giving vide 'publicity to Toll free - No. 1912 and 18004250028 by arranging painting on

		all DTRs on all Electricity Bills provision for registering complaints in NPDCL 'App (Consumer -Grievances).and. publicity in print media and "requesting the 'consumers to register complaints through to free Nos. instead of attending the complaints by them selves to avoid accidents
8.1	According to NPDCL filings of FY 2025-26 total arrears of Rs. 50,000 and more pending for six months as on 30-09-2024 are Rs. 13, 372.61 crore. These arrears are equal to 82.36% of ARR of FY 2024-25. According to SPDCL filings of FY 2025-26 total arrears of Rs. 50,000 and more pending for six months as on 30-09-2024 are Rs. 17, 405.05 crore. These arrears are equal to 45.87% of ARR of FY 2024-25. Both the DISCOMs are facing arrears of Rs. 30,777.66 crores. Substantial portion of these arrears have to come from state government departments. (While SPDCL mentioned the arrears due from Government departments NPDCL did not show these details. NPDCL provided circle wise information). According to SPDCL submission arrears due from state government departments stand at Rs. 11,030.66 crore accounting for 63.38% of the arrears. Situation may be the same or even worse in the case of NPDCL. According to Section 1.2 i) of UDAY – MoU all outstanding dues from the government departments to DISCOMs for supply of electricity shall be paid by 31-03-2017. Since then, arrears from state government departments in fact have increased.	Arrears pending from Govt. Departments who have arrears of more than Rs 50,000 in TGNPDCL as on 30-09-2024 is Rs. 9,218.27 Crores
8.2	If the arrears below Rs. 50,000 are also taken in to account total arrears due to TGDISCOMs will be much higher. Because of these mounting arrears TGDISCOMs are forced in to heavy debt burden and it is one of the reasons for losses incurred by the TGDISCOMs. We request the Commission to advise the State Government to release arrears pending from state government departments in a time bound manner. We also request the Commission to direct DISCOMs to take effective steps to bring down arrears from other consumers.	The Discom is resorting to prompt disconnection, if consumer fails to pay within date of disconnection and efforts to collect outstanding arrears from the consumers are made.
9	Tariffs are expected to be fixed in such a manner that reasonable costs of licensees are recovered. TGNPDCL's Annual report for FY 2023-24, shows loss of Rs 1441 Crore in FY 2023-24 and cumulative loss at the	The Licensee has not proposed any tariff increases as a part of the revised FY26 ARR petitions. The Honorable Commission is

	<p>end of FY 2023-24 as Rs. 20,010.99 Crore. TGSPDCL's Financial report for FY 2023-24 shows loss of Rs.4909.53 Cr in FY24. Cumulative losses of TGSPDCL have reached Rs.47,239.15 Crore. No tariff hike, no true up/FCA, no control on power purchase and other costs, and failure of the State governments to discharge their stated financial commitments to TGDISCOMs have pushed TGDISCOMs in to deep financial troubles.</p>	<p>requested to approve the same post prudence check.</p> <p>1. The Power Purchase Cost increased due to increase in Agriculture sales by 1,049.28 MU than the approved sales.</p> <table><tr><td>Approved Sales</td><td>8,397.75 MU</td></tr><tr><td>Actual Sales</td><td><u>9,447.03 MU</u></td></tr><tr><td></td><td><u>1,049.28 MU</u></td></tr></table> <p>2. The Govt of Telangana has agreed vide Letter Dt.16-03-2023 to arrange True up amount of Rs. 3,045 Cr for TGNPDCL in the future years. With that the accumulated loss will come down.</p> <p>The FCA charges for the year to be levied as per Regulation No.1 of 2023 Dt: 18.01.2023 on consumers for the year 2023-24 was Rs. 2,147 Cr was not included in the C.C. Bills as the Govt has not accepted to collect from the consumers with a view to reimburse the same to DISCOMs. If the FCA is considered as revenue TGNPDCL will be in the profit of Rs.706 Cr (i.e. Rs.2147 Cr – 1441 Cr) the total accumulated losses will come down.</p>	Approved Sales	8,397.75 MU	Actual Sales	<u>9,447.03 MU</u>		<u>1,049.28 MU</u>
Approved Sales	8,397.75 MU							
Actual Sales	<u>9,447.03 MU</u>							
	<u>1,049.28 MU</u>							
10	<p>At present tariff for electrical vehicle (EV) is Rs. 6 per unit plus Rs. 100 per kV demand charges. This is the tariff that DISCOMs collect from the agencies that have set up charging stations. But there is no limit or control on what these charging stations collect from vehicle owners for charging their vehicles. These charges are reported to range from Rs. 12 to Rs. 25 per unit. (Eenadu, 24/06/2024, Greater Hyderabad Edition). The Commission is requested to set the tariff for sale of electricity by EV charging stations to electrical vehicle owners. This</p>	<p>DISCOMs are adhering to the terms and conditions of the tariff categories applicable for EV charging point operators. It is to submit that it is not purview of TG DISCOMs.</p>						

	may be set on the lines Oil Companies determine the prices for dispensing petrol and diesel by oil filling stations.	
11	We request the Commission to take our above submissions on record and allow us to make further submissions during the public hearing.	Under the purview of the Honorable Commission. Further TG DISCOMs requested to the Hon;ble Commission to consider the DISCOMs proposals and approve the filings of ARR,FPT and CSS for FY 2025-26

రిటైల్ సప్లయ వ్యాపారముకోసము 2025-26 ఆర్థిక సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు ధరల ప్రతిపాదనలు & క్రాస్సబ్సిడీ సర్పార్టీ ప్రతిపాదనలు పై Sri G. Vinod Kumar, DR.A.V.Rao, Gopal Reddy, Ilesh, M.Sridhar Reddy, D.Ramu, C.Vijayabhaskar, M. Raji Reddy, S.Ravinder, Vijay Gopal Rao, V. Lavanya Reddy, P.Venkata Subba Reddy, A.Shanker Rao, P.Venkat Reddy, P.Vittal, J.Sriranga Rao, P.Srinivasa Rao, R.Linga Reddy, M.Rajanna, E. Ramgopal Reddy, S.Bhuma Reddy, Rajamahender, B.Krishna Reddy, D. Sridevi, M.Rama Rao, N.C.Venkateshwarlu, G.Dashrath Reddy, L.Jalandhar Reddy, M.Thirupathi Reddy, K.Somsekhar, Sridhar, Raidu, Sharath, B.Satyanarayana, M.Ramesh, G.Satyanarayana, Srinivas, Saya Reddy, Sanjeeva Reddy, Thirupathi Reddy, O.Sataiah, O.Ravinder, J.Bhuma Reddy, J.Rajender, O.Ravinder, K.Anjanna, J.Sampath RAO, L.Shankar, M.Rajesh Goud, Ch.Purushotham Reddy, I. Rajender, M.Hanumantha Reddy, K.Pentaiah, P.Srinivasalu, P.Muralidhar, A.Anand Rao, G.Nagesh, D.Ravi, L.Venkat Reddy, R.Linga Reddy, B.Raghava Reddy, G.Mahender Reddy, YRKS Prasad, K.Laxma Reddy, T.Srinivas Rao

గార్ల సూచనలు/సలహాలకు సమాధానాలు.

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TGNPDCL – సమాధానాలు
1.	విద్యుత్ స్తంభాల DTR ల రవాణాలో అనుభవంలేని రైతులచే గావిస్తున్న అధికారులు, కాంట్రాక్టర్ల పై క్రిమినల్ కేసులు నమోదుచేసి వారిని శిక్షింపజేసి అసువులు బాసిన రైతు కుటుంబాలకు తగిన పరిహారం ఇప్పించాల్సిందిగా కోరుచున్నాము.	విద్యుత్ స్తంభాల మరియు DTR ల రవాణా రిజిస్టర్డ్ కాంట్రాక్టర్లచే చేయబడుతుంది.
2.	Poles వేయక, కండక్టర్ లాగకుండానే, DTR బిగించకుండానే DD లు చెల్లించి అప్లయి చేసుకున్న రైతాంగానికి సంబంధించిన కనెక్షన్ లు రిలీజ్ చేసి మెటీరియల్ మొత్తాన్ని ప్రక్కదారి పట్టించి అక్రమాలు చేస్తున్న అధికారులు కాంట్రాక్టర్ పై క్రిమినల్ కేసులు పెట్టి శిక్షించాలి.	ప్రస్తుతం పోల్స్ మరియు కండక్టర్ లాగకుండానే DTR బిగించడం సర్వీసు రిలీజ్ చెయ్యడం లేదు. ఇంకా TGNPDCL నాణ్యత నియంత్రణ విభాగం వారు ప్రతి పని ముగిసిన తరువాత నాణ్యత మరియు ప్రమాణాలను తనిఖీ చేసి ఏదైనా

		వ్యత్యాసం ఉంటే వారి పై డిపార్టుమెంట్ నిబంధనలు ప్రకారం చర్యలు తీసుకోవడం జరుగుతుంది.
3.	Discom ల Corporate Office ల కంట్రీల్ ఉండి పనిచేసిన 1800 425 3600, 1800 425 0028 నెంబర్ల ద్వారా రైతు వినియోగదారుల విద్యుత్ సరఫరా సమస్యలను పరిష్కరించాలి .	TGNPDCL కాలే సెంటర్ 2011 లో స్థాపించబడింది. టోల్ ఫ్రీ నెంబర్ 1800 425 0028 మరియు 1912 ద్వారా సంవత్సరానికి సుమారుగా 60000 పిర్యాదులు వినియోగదారుల నుండి నమోదు చేసుకొని పరిష్కరించబడుతున్నాయి.
4.	Agl సరఫరా కొరకు రైతాంగం అప్లయి చేసుకునేటప్పుడు Irrigation Source Bore Well or Open Well ఏ Source అనేది అప్లికేషన్ లో వ్రాయమంటారా. ఈ రెండు Source లేకుండా స్థానిక నీటి వనరులు, కాలువలు, వాగులు, ఇలా రకరకాలుగా ఉంటాయి. కావున Water Source ను particularxe mention చేయక ఉంది అని తెలియబరిస్తే సరిపోతుంది. అప్లికేషన్ ప్రోఫార్మాను మార్చివలసిందిగా కోరుచున్నాము.	విద్యుత్తు శాఖ నిబంధనల ప్రకారం వ్యవసాయ సర్వీసులు ఓపెన్ బావులు మరియు బోర్ బావులకు మాత్రమే ఇవ్వటం జరుగుతుంది.
5.	C.G.R.F సమావేశాల సమాచారం Independent Member కు కూడా ఒక రోజు కన్న తక్కువ సమయం ఉండగా (గంటల) తెలియజేస్తున్నారు. వినియోగదారులకు తెలియకుండా జాగ్రత్త పడి మ మ: అనిపిస్తున్నారు. ప్రతీ నెల ఎన్ని సమావేశాలు పెట్టవచ్చు, ఎన్ని పెడుతున్నారు? మిగతా సమయం ఏమి చేస్తున్నారో కూడా E.R.C వారు పరిశీలించి తగిన చర్యలు తీసుకోవాలి.	ప్రతి నెల చివరి వారంలో రాబోయే నెల యొక్క CGRF సమావేశాల అధికార ప్రకటనను తేదీల వారిగా విడుదల చేయటం జరుగుతున్నది. అట్టి ప్రతిని సబంధిత అధికారులకు మరియు ఇండిపెండెంట్ మెంబర్ గారికి పోస్ట్ ద్వారా పంపడం మరియు CGRF ఆఫీస్ వాట్సాప్ గ్రూపులో కూడా పోస్ట్ చేయటం జరుగుతున్నది. ఇట్టి గ్రూపులో ఇండిపెండెంట్ మెంబర్ కూడా ఉన్నారు. అలాగే, ఇండిపెండెంట్ మెంబర్ గారికి గల ఆఫీస్ నంబర్ కి కూడా వాట్సాప్ ద్వారా పంపడం జరుగుతున్నది. దాదాపుగా ఒక వారం ముందుగానే అందరికీ తెలియపరచడం జరుగుతున్నది. కానీ, కొన్ని గంటల ముందుగానే ఇండిపెండెంట్ మెంబర్ గారికి తెలియజేస్తున్నారనటంలో వాస్తవం లేదు.

		<p>సబ్ డివిజన్, సెక్షన్ లెవల్లో జరిగే CGRF మీటింగ్ వివరాలు 3 లేదా 4 ప్రాంతీయ దిన పత్రికలలో ఇవ్వటం జరుగుతున్నది. మరియు, ఫీల్డ్ అధికారులు మరియు స్టాఫ్ తమ వాట్సాప్ విలేజ్ గ్రూపులలో కూడ పోస్ట్ చేయటం జరుగుతున్నది.</p> <p>CGRF నియామక చిట్టా 2.3 అఫ్ రెగ్యులేషన్ 3/2015 అఫ్ TGNDCL ప్రకారం వారానికి ఒకటి చొప్పున సమావేశాలు జరపాలి. అనగా నెలకు నాలుగు సమావేశాలు జరపాలి. కానీ, ప్రతి నెల 6 నుండి 7 సమావేశాలు పెట్టటం జరుగుతుంది. మిగతా సమయంలో పెండింగ్ కేసులు డీస్పోస్ చేయటం మరియు అవసరమైన కొన్ని కేసులకు హియరింగ్ నిర్వహించి కేసులను పరిష్కరించటము జరుగుతుంది.</p>
6.	<p>Regulation 4 of 2013 – DTR వరకు Discom ల బాధ్యత అని ఉంది. కానీ ప్రతి Agl Estimation DTR HT Line Include చేసి ORC చెల్లించమంటున్నారు. DTR, HT Line Estimation లో చేర్చడం వల్ల పెరిగిన ధరల కారణంగా Estimate రూ. లు లక్షల్లో అయి O.R.C చెల్లిదాల్సిన అవసరం ఏర్పడుతుంది. ప్రతి కనెక్షనుకు ఎక్కువకు ఎక్కువ 3 Poles దానికి సంబంధించిన మెటీరియల్ ఇచ్చి కనెక్షన్ రిలీజ్ చేస్తూ, వినియోగదారునికి వాడిన మొత్తం సామాను వివరాలతో లెటర్ ఇవ్వాలి. Estimate లో సామానుకు వాస్తవ వినియోగ సామనుకు వ్యత్యాసం తెలియడమే కాకుండా పారదర్శకంగా కూడా ఉంటుంది.</p>	<p>మెమో నెం. CGM(C)/GM(C)/DE(C)/ADE(C)/AE(C)/D.నెం.676/16-17, తేది. 01-11-2016 ద్వారా డిపార్టుమెంట్ వారు జారీ చేయబడిన ఆదేశాల ప్రకారం వ్యవసాయ సర్వీసులు ఇవ్వడం కోసం టి.జి.ఎస్.పి.డి.సి.యల్ చేపట్టిన వ్యయానికి సంబంధించిన అంచనా (Estimate) లో HT లైన్, LT లైన్ మరియు DTR ప్రతి సర్వీసుకు Rs. 50,000/- నుండి Rs. 75,000/- వరకు, అంచనా (Estimate) లో LT లైన్ మాత్రమే ఉంటే ప్రతి సర్వీసుకు Rs, 32,000/- నుండి Rs. 45,000/- వరకు పెంచడం జరిగింది.</p> <p>ఒక వేల అంచనా (Estimate) లో పైన చెప్పిన దాని కంటే డిపార్టుమెంట్ చేసే ఖర్చు ఎక్కువగా ఉంటే మిగిలిన మొత్తాన్ని (ORC) డిమాండ్ నోటీసు రూపంలో వినియోగదారులకు తెలియజేస్తారు, దానితో పాటు మెటీరియల్ జాబితా</p>

		మరియు తెలుగు ఫార్మాట్లో లైన్ స్కెచ్ కూడా పంపబడుతుంది.
7.	అన్ని దరల పెరుగుతున్నందున విద్యుత్ టారిఫ్ కూడా సహేతుకంగా లెక్కలు కట్టి సరిచేయాలి. ఇంధన ధరలు సమీక్ష చేసి ఎప్పటికప్పుడు ఇంధన సర్దుబాటు చేయాలి.	పెరుగుతున్న దరలకు అనుగుణంగా ప్రతీ సంవత్సరం లైసెన్స్ సమగ్ర ఆదాయ ఆవశ్యకత (ARR) మరియు ధరల ప్రతిపాదనలను గౌరవనీయమైన కమిషన్ వారికి సమర్పించడం జరుగుతుంది మరియు కమిషన్ వారు బహిరంగ విచారణ చేసి, రిటైల్ సప్లయ వ్యాపారమునకు దరలను నిర్ణయించడం జరుగుతుంది.
8.	కేంద్ర, రాష్ట్ర (రక్షణ) ప్రభుత్వాల ఉద్యోగుల వేతనాలను ఆధారంగా చేసుకొని Discom ల ఉద్యోగుల వేతనాలను సరిచేయాలి. ఎక్కువ వేతనాలు ఉంటే తగ్గించాలి. ఆర్టిసన్ ఉద్యోగులకు, క్షేత్ర స్థాయిలో పని చేస్తున్నవారికి వేతనాలు పెంచాలి. P.R.C. అమలును కేంద్ర, రాష్ట్ర లేదా (రక్షణదళాలు) మాదిరిగా అమలు చేయాలి నష్టపోతున్న Discom ల నుండి అధిక వేతనాలు ఇవ్వడం Discom కు ఆత్మహత్య సదృశ్యం అవుతుంది. Discom లు ఈ కారణంగా ప్రైవేటీకరణకు కూడా అవకాశం ఉంది. వినియోగదారుల నుండి ముక్కుపిండి వసూలు చేసిన సొమ్మును కొంత మందికి అత్యధికంగా చెల్లించి వినియోగదారుల ఉసురు పోసుకోరాదని కోరుచున్నాము.	వేతన సవరణ చర్చల కమిటీ'2022 నివేదిక ప్రకారం మరియు తెలంగాణ పవర్ యుటిలిటీల యాజమాన్యాలు, తెలంగాణ పవర్ యుటిలిటీలలో ప్రాతినిధ్యం వహిస్తున్న యూనియన్ల మధ్య కుదిరిన సెటిల్మెంట్ మెమోరాండం ప్రకారం హైదరాబాద్, కార్మిక జాయింట్ కమిషనర్ (జంట నగరాలు) పారిశ్రామిక వివాదాల చట్టం, 1947 మరియు తెలంగాణ రాష్ట్ర పారిశ్రామిక వివాదాల నియమాలు, 1958 యొక్క నిబంధనల ప్రకారం ఉద్యోగులు మరియు చేతివృత్తుల వారి జీతాలు మరియు అలవెన్సులు పెంచబడ్డాయి.
9.	Discom లు వేస్తున్న LT, HT Line లను దారులు వెంట మరియు హద్దులు వెంట వెయ్యాలి. పొలం నడి మధ్య నుండి వెయ్యరాదు. ఉన్నవి సరిచేయాలి.	ప్రస్తుతం LT, HT లైన్ లను దారుల వెంట మరియు హద్దుల వెంట వేస్తున్నాము.
10.	Transco వారు వేస్తున్న అన్ని Line లు Procedure follow కాకుండా వేస్తున్నారు. రైతుల భూములకు సరియిన నష్టపరిహారం ఇవ్వడం లేదు దాని పైన వేసిన Line ల పైన E.R.C. వారు Enquiry చేసి భూయజమానుల హక్కులను హరించి కాంట్రాక్టర్లకు లాభం చేస్తున్న అధికారులను శిక్షించాలి. భూయజమానులకు	లైసెన్స్ పరిధిలో లేని అంశం

	సరివైన నష్టపరిహారం ఇప్పించాలి.	
11.	<p>Airport లను Railway మరియు Bus stand Category నుండి తొలగించి ప్రత్యేక Commercial Category చేయాలి. End Consumption ఆధారంగా Tariff నిర్ణయించాలి. Railway మరియు R.T.C ప్రభుత్వ రంగంలో ఉండి ప్రజాసేవ చేస్తున్నారు. Airport(GMR) Parking Fee, Tea, Snacks సామాన్యం భరించలేని స్థితిలో ధరలు ఉన్నాయి. కావున వారి ధరల వల్ల విద్యుత్ Tariff కూడా ఉండాలి. విలాసవంతమైన హోటల్ లు, జ్యువలరీ షాప్స్, మద్యం షాప్స్ లు వ్యాపారాలు చేస్తున్నందుకు దానికి తగినట్లు Tariff ఉండాలి. ప్రభుత్వ రంగంలో కాకుండా ప్రైవేట్ రంగంలో ఉండి ప్రయాణికులకు సేవ చేస్తున్న రవాణా సంస్థలు కూడా ప్రత్యేక రవాణా Tariff ను వర్తింపజేస్తారా వివరణ ఇవ్వాలి.</p>	<p>గౌరవనీయమైన కమీషన్ వారు తేదీ 28.10.2024 నాడు జారీ చేసిన టారిఫ్ ఆర్డర్ 2024-25, ధరల నియమ నిబంధనలు ప్రకారం Airports, Railway stations, & Bus Stands HT-III విభాగం క్రిందకు వస్తాయి. Airports ని HT-III విభాగం నుండి తొలగించుట అనేది గౌరవనీయమైన కమీషన్ పరిధిలోని అంశం మరియు ప్రయివేటు రవాణా సంస్థలకు LT-II లేదా HT-II (కమర్షియల్) విభాగం కు సంబంధించిన ధరలు వాటి లోడ్ సామర్థ్యాన్ని బట్టి HT లేదా LT ధరలు వర్తిస్తాయి.</p>
12.	<p>Agl సరఫరాకు Unit Cost ఎంత ఖర్చు అవుతుందో తెలియజేయాలి రైతాంగం పై ప్రేమతో యూనిట్ కు ఎంత ఛార్జ్ చేస్తున్నారు కూడా తెలియజేయాలి. Agl వినియోగ బిల్లు ప్రభుత్వం ఎంత చెల్లించింది ఎంత బాకీ ఉన్నదో కూడా తెలియజేయగలరు.</p>	<p>గౌరవనీయమైన కమీషన్ వారు ఆర్థిక సంవత్సరం 2024-25కు జారీ చేసిన టారిఫ్ ఆర్డర్ ప్రకారం 2024-25 ఆర్థిక సంవత్సరానికి TGNPDCL కి సంబంధించిన వ్యవసాయ విద్యుత్ సరఫరా యూనిట్ Rs. 8.89/- (వ్యయం రూ॥ 7,548 కోట్లు) అందులో ప్రభుత్వం వ్యవసాయ విద్యుత్ సబ్సిడీ క్రింద యూనిట్ ఒక్కంటికి రూ. 7.43/-(రూ॥ 6,314 కోట్లు) చెలిస్తున్నది. వ్యవసాయ విద్యుత్ కు ఎలాంటి ఎనర్జీ ఛార్జీలు లేవు.</p> <p>ఆర్థిక సంవత్సరం 2024-25 లో ఫిబ్రవరి -2024 వరకు ప్రభుత్వం నుండి వ్యవసాయ విద్యుత్ సబ్సిడీ క్రింద రూ॥ 5,788 కోట్లు వచ్చినాయి.</p> <p>ప్రభుత్వం నుండి వ్యవసాయ విద్యుత్ సబ్సిడీ క్రింద రావలసిన బకాయి ఏమి</p>

		లేదు.
13.	H.T. Lift Irrigation సంవత్సర వినియోగం ఎంత? బిల్ ఎంత చెల్లించారు.	ఆర్థిక సంవత్సరం 2023-24 కి HT Lift Irrigation విద్యుత్ వినియోగం 1,997.15 మిలియన్ యూనిట్లు మరియు ఆర్థిక సంవత్సరం 2023-24 లో H.T. Lift Irrigation వారు రూ॥ 467.70 కోట్లు బిల్ చెల్లించారు.
14.	విద్యుత్ ఛార్జింగ్ స్టేషన్లకు సరఫరా చేసే విద్యుత్ డిమాండ్ అధికంగా ఉన్నప్పటి ధర కన్నా రాత్రి వేళల్లో డిమాండ్ లేనప్పటి ధర తగ్గించి ఇస్తే రవాణా వాహనాలపై ఆధారపడి బడుగు బలహీన కార్మికులకు లాభం జరుగుతుంది. రాత్రి వేళల్లో Tariff తక్కువగా ఉన్న సమయంలో ఛార్జింగ్ చేసుకునే వారు లాభం పొందడమే కాకుండా విద్యుత్ డిమాండ్ Non-Peak Hours పెంచుతారు.	HT విద్యుత్ ఛార్జింగ్ స్టేషన్లకు సరఫరా చేసే యూనిట్ ధర రూ॥ 6/- మాత్రమే మరియు రాత్రి-10.00 గంటల నుండి ఉదయం 6 గంటల వరకు (off Peak Hours) యూనిట్ ఒక్కంటికి రూ॥ 1.50/- తగ్గింపుతో రూ॥ 4.50/- కి ఇవ్వటం జరుగుతున్నది.
15.	రైతు వారీగా పోషించుకొనే పశుసంపదకు (వ్యవసాయ అనుబంధ సేంద్రీయ ఎరువులు కొరకు) వ్యవసాయ ఉచిత విద్యుత్ కనెక్షన్ ఉన్న చోట పశుపోషణకు కూడా ఉచితంగా విద్యుత్ వాడుకునే అవకాశం ఇవ్వాలి.	గౌరవనీయమైన కమిషన్ వారు తేదీ 28.10.2024 నాడు జారీ చేసిన టారిఫ్ ఆర్డర్ 2024-25, ధరల నియమ నిబంధనలు ప్రకారం పశు పోషణకు వాడుకునే విద్యుత్ వ్యవసాయ విభాగం క్రింద పరిగణించబడదు. కావున వ్యవసాయ ఉచిత విద్యుత్ కనెక్షన్ ఉన్న చోట పశుపోషణకు కూడా ఉచితంగా విద్యుత్ వాడుకొనే అవకాశం ఇవ్వాలి అనే అంశం గౌరవనీయమైన కమిషన్ వారి పరిధిలోనిది
16.	అతి తక్కువ వేతనాలతో సేవ చేస్తున్న ఆర్. టీ. సి. వారిని, నిజాయితీగా పని చేస్తున్న Texmo వారిని ఇతరులను అదర్భముగా తీసుకోని వారినుండి స్ఫూర్తి పొంది డిస్కంల వారు కూడా పని చేయాలనే కోరుతున్నాను.	మీ సూచనలకు ధన్యవాదములు. మీరు ఇచ్చిన సలహాను పరిగణలోకి తీసుకొంటాము.

రిటైల్ సప్లయి వ్యాపారముకోసము 2025-26 ఆర్థిక సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు దరల ప్రతిపాదనలు & క్రాస్సబ్సిడీ సర్పార్టీ ప్రతిపాదనలు పై బొమ్మినేని రాఘవ రెడ్డి # 3 -14-719 KUC 'X' Road Hanumakonda, Warangal - 506009 cell No. 99481-68606 గారి

సూచనలు/సలహాలకు సమాధానాలు.

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TGNPDCL - సమాధానాలు
1.	<p>చక్రవర్తుల వెంకటేశ్వర్లు : అధ్యక్షులు</p> <p>బొమ్మినేని రాఘవ రెడ్డి : TREASURER</p> <p>విద్యుత్ పాక్ వల్ల మరణించిన వారు వరికెల గోవర్ధన్ S/o. వీరయ్య R/o.మందపల్లి మండలం: దుగ్గొండి జిల్లా: వరంగల్ ఎక్స్‌గ్రేషియా గూర్చి పై విషయం పురస్కరించుకొని తెలియజేయుట ఏమనగా పై వ్యక్తి 12-11-2024 న మరణించినాడు అతనికి ఇంతవరకు ఎక్స్‌గ్రేషియా రాలేదు. కావున తొందరగా ఇప్పించే ప్రయత్నం చేయగలరు. స్థానిక కార్యాలయంలో అన్ని సంబంధించిన పేపర్స్ ఇచ్చినాము వారు ఎలక్షన్ కోడ్ పేరుతో delay చేస్తున్నారు కావున దయచేసి తొందరగా ఇప్పించగలరు.</p>	<p>శ్రీ వరికెల గోవర్ధన్ S/o వీరయ్య, మందపల్లి (వి) దుగ్గొండి మండలం గారు విద్యుత్ ప్రమాదం తో చనిపోయినందున రూ.5,00,000=00 (ఐదు లక్షలు) ఎక్స్‌గ్రేషియా మొత్తాన్ని Cheque నెంబర్: 922208, తేది: 04.03.2025 ద్వారా మందపల్లిలో శ్రీమతి వరికెల ఉమాదేవి గారికి అందచేయడం జరిగినది.</p>

రిటైల్ సప్లయి వ్యాపారముకోసము 2025-26 ఆర్థిక సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు దరల ప్రతిపాదనలు & క్రాస్సబ్సిడీ సర్పార్టీ ప్రతిపాదనలు పై శ్రీ మినుముల దేవేందర్ , గ్రామం: లింగాపురం మండలం: చెన్నరావుపేట Cell No. 9849317109 గారి సూచనలు/సలహాలకు సమాధానాలు.

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TGNPDCL – సమాధానాలు
1.	నేను అనగా మినుముల దేవేందర్ S/O. బిక్షపతి R/O. లింగాపురం మరియు రైతులు అందరం గత సంవత్సరము నుండి SS1 ట్రాన్స్ఫర్మ్ ఓవర్ లోడ్ సమస్యవల్ల రైతులకు తీవ్ర ఇబ్బందుల ఎదుర్కొనుచున్నాము, పంటలకు సరిగా నీరు అందక ఎండిపోయే అవకాశం ఉన్నందున దీనిని ఎంక్వరీ చే వెంటనే సమస్యను పరిష్కరించగలరని మనవి ధన్యవాదములతో	లింగాపురం వద్ద SS-I/100KVA DTR యొక్క OLR కు 1X100KVA DTR ను WBS నెం. T-2401-07-02-02-02-062 ద్వారా తేదీ:06.03.2025 న మంజూరు చేయబడినది మరియు ఈ పనిని 7 రోజుల్లో పూర్తి చేయడం జరుగుతుంది.

రిటైల్ సప్లయి వ్యాపారముకోసము 2025-26 ఆర్థిక సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు దరల ప్రతిపాదనలు & క్రాస్సబ్సిడీ సర్పార్టీ ప్రతిపాదనలు పై పువ్వాల శ్రీనివాస్ రావు S/o. వెంకటేశ్వర్లు ఇంటి. నెం. 5-12-188/B/786, మంచికంటి నగర్, పాల్వంచ, ఖమ్మం – 507159 గారి సూచనలు/సలహాలకు సమాధానాలు.

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TGNPDCL – సమాధానాలు
1.	మా మనవి ఏమనగా పువ్వాల వెంకటేశ్వర్లు S/o. పుండరీకాక్ష గ్రామం: ములకలపల్లి జిల్లా భద్రాద్రి కొత్తగూడెం మా యొక్క సర్వే నం. 346/1 లో భూమి మద్య నుండి 33 KV లైను గతంలో మా అనుమతి లేకుండా వేసినారు, ఇప్పుడు ఇడ్ల నిర్మాణం చేయాలనుకుంటున్నాము కనుక వాటిని తొలగించి రోడ్డు ప్రక్కన వేసుకోగలరని మా యొక్క మనవి.	క్షేత్రస్థాయి పరిశీలనలో, గమనించబడింది ఏమనగా 1975 సంవత్సరంలో బహిరంగ ప్రదేశాలలో 33 KV అంకంపాలెం ఫీడర్ లైన్ నిర్మించబడిందని, కొన్ని సంవత్సరాలుగా సర్వే నెం. 346/1 సమీపంలో కొన్ని నివాస గృహాలు నిర్మించుకోవడం జరిగినది. ఇంకా, ఆ ప్రదేశంలో ఇటీవల కాలంలో ఏ కొత్త లైన్లు నిర్మించబడలేదు.

రిటైల్ సప్లయి వ్యాపారముకోసము 2025-26 ఆర్థిక సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు దరల ప్రతిపాదనలు & క్రాస్సబ్సిడీ సర్పార్టీ ప్రతిపాదనలు పై మమ్మాయి రాజన్న గ్రామం: అమ్రాడ్, మండలం: మాక్లూర్ జిల్లా: నిజామాబాద్ గారి సూచనలు/సలహాలకు సమాధానాలు.

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TGNPDCL - సమాధానాలు
1.	అమ్రాడ్ గ్రామం మాక్లూర్ మండలం జిల్లా: నిజామాబాద్ గ్రామ శివారులోని AGL LT లైన్ 11 KV లుజ్ లైన్లు ఉన్నవి. కావున దయచేసి ఇంటర్నల్ పోలు వెయ్యగలరని మనవి	అమ్రాడ్ (V) లో ఉన్న 11కేవి లూజ్ లైన్స్ కు 30 స్తంభాలు మరియు LT (AGL) లూజ్ లైన్స్ కు 28 స్తంభాలు శాంక్షన్ చెయ్యడం జరిగినది. అక్కడ పంటలు ఉండడం వల్ల పని చేయలేక పోయారు, పంట కోతలు ఐపోయిన తరువాత పని పూర్తి చేయడం జరుగుతుంది.
2.	గత సంవత్సరము, నన్నెం నడ్డి మల్లయ్య S/O. చిన్న మల్లయ్య వయసు:51 గ్రామము పిప్లి H.No.913/3/1 మం: ఆర్మూర్ జిల్లా: నిజామాబాదు అనే రైతు గత సంవత్సరము, 20-1-2024 రోజున వ్యవసాయ పొలంలో ప్రమాదశాస్త్ర విద్యుత్ షాక్ తో మరణించినడు. ఇంత వరకు నష్ట పరిహారము అందలేదు సంవత్సరము నుండి విద్యుత్ ఆఫీస్ చుట్టూ తిరుగుచున్నాము. దయచేసి మీరు నష్ట పరిహారము ఇప్పించగలరని మనవి భార్య చిన్నుబాయి కుమారుడు నన్నెం వంశీ Mobile No. 9494258899.	నన్నెం నడి మల్లయ్య S/O.చిన్న మల్లయ్య గ్రామం: పిప్లి మండలం: ఆర్మూర్ జిల్లా:నిజామాబాద్ అనే రైతు విద్యుత్ షాకు వలన మరణించడం జరిగినది, దానికి గాను నష్ట పరిహారము క్రింద రూ.5,00,000/- (అయిదు లక్షల రూపాయలు) చెల్లించబడినది.

రిటైల్ సప్లయ వ్యాపారము కోసము 2025-26 ఆర్థిక సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు దరల ప్రతిపాదనలు & క్రాస్సబ్సిడీ సర్పార్టీ ప్రతిపాదనలు పై ఇప్పు రాంగోపాల్ రెడ్డి S/o. పాపరెడ్డి ఇంటి. నెం. 6-11 గ్రామం: కాల్య మండలం: దిలావర్పూర్ జిల్లా: నిర్మల్ గారి సూచనలు/సలహాలకు సమాధానాలు.

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TGNPDCL - సమాధానాలు
1.	<p>మీతో మనవి చేయునది ఏమనగా మా కుటుంబము సంబంధించిన వ్యవసాయ భూమిలో అనగా గ్రామం: కాల్య మండలం: దిలావర్పూర్ జిల్లా: నిర్మల్ లో ప్రభుత్వ బడి దగ్గర ప్రవహించు ఒరె దగ్గర పామ్ ఆయిల్ తోటలో గత సంవత్సరము నుండి ట్రాన్స్ఫార్మర్ మాటి మాటికి ట్రిప్ అవుతున్నది. దీనికి 5 మోటర్లు చుట్టు పక్కల రైతులకోసం స్వంత ఖర్చులతో అమర్చినారు. 4 లేక 5 మోటర్లు ఒక్కసారి నడిచేసరికి ట్రాన్స్ఫార్మర్ ట్రిప్ అవుతున్నది. కావున మా సమస్యలను వెంటనే పరిష్కరించాలి సరిఅయిన కెపాసిటీ గల ట్రాన్స్ఫార్మర్ అమర్చడం ద్వారా! అలాగే మా తోటలో పామ్ ఆయిల్ అయిన చెట్లు ప్రభుత్వ స్కీం క్రింద పెట్టినాము. అయితే ఇంతకు మునుపు మా తోటలో మా అనుమతి లేకుండా మరియు కరెంటు డిపార్ట్మెంట్ వారు ఒక పద్ధతి/వరుస/త్రోవ లేకుండా ఇష్టమొచ్చినట్లు లైన్లు గుంజినారు. కావున మా పామ్ ఆయిల్ తోటలో గల కరెండు సరఫరా చేసి లైన్లు సరైన క్రమములలో అమర్చ గలరని మనవి.</p> <p>అలాగే తోటలో మరియు మా గ్రామములోని పలు భూమిలో కాని రోడ్డు పొంటి కాని లూజ్ వైర్లు ఉన్న లైన్లు, మరియు వంగిపోతున్న కరెంటు పోలు లైన్లు ఉన్నవి. కావున వంగిపోవుచున్న పోల్లు సరిచేయటం అలాగే లూస్ లైన్లు టైట్లా/నిదానంగా అమర్చగలరని ప్రార్థన.</p>	<p>దిలావర్పూర్ సెక్షన్లోని కాల్య గ్రామానికి చెందిన శ్రీ గోపాల్ రెడ్డి గారి వ్యవసాయ భూమిలో వున్న DTR అనధికార అదనపు లోడ్ కారణంగా ఓవర్లోడ్ అయింది. అదనపు లోడ్ ని క్రమబద్ధీకరించటానికి మరియు అదనపు DTR పెట్టడానికి 7 రోజులు సమయం పడుతుంది.</p>

రిటైల్ సప్లయి వ్యాపారం కోసం 2025-26 ఆర్థికసంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత, ధరలప్రతిపాదనలు, క్రాస్సబ్సిడీసర్చార్జీప్రతిపాదనలు

పై గిరెడ్డి సత్యనారాయణ రెడ్డి సంకిపెల్లి గూడెం గ్రామం శబాద్ మండలం రంగారెడ్డి జిల్లా గారి సూచనలు/సలహాలకు సమాదానాలు

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TGNPDCL - సమాదానాలు
1	అధ్యక్షుల వారికి నమస్కారములు నేను నా పేరు గిరెడ్డి సత్యనారాయణ రెడ్డి సంకిపెల్లి గూడెం గ్రామం శబాద్ మండలం రంగారెడ్డి జిల్లా వాస్తవ్యుడు మీ యొక్క బహిరంగ విచారణ సమావేశంలో మాట్లాడడానికి అవకాశం కల్పించవల్సిందిగా కోరుచున్నాము జై జవాన్ జై కిసాన్	గౌరవనీయమైన కమీషన్ గారి పరిధిలోని అంశం.

రిటైల్ సప్లయి వ్యాపారముకోసము 2025-26 ఆర్థిక సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు దరల ప్రతిపాదనలు & క్రాస్సబ్సిడీ సర్పార్టీ ప్రతిపాదనలు పై ఒడ్పాం సత్తయ్య, గ్రామం: వెంకటాపూర్, మండలం: సారంగాపూర్, జిల్లా: నిర్మల్ గారి సూచనలు/సలహాలకు సమాధానాలు.

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TGNPDCL – సమాధానాలు
1.	మీతో మనవి చేయునది ఏమనగా ఒడ్పాం సత్తయ్య గ్రా: వెంకటాపూర్ మం: సారంగాపూర్ జిల్లా: నిర్మల్ గారి చేను లో పాత ట్రాన్స్ ఫార్మర్ ఇనుప పోల్స్ వున్నవి వాటి ద్వారా విద్యుత్తు సరఫరా జరిగి పశువులు చనిపోతున్నవి. కావున ఇనుప పోల్స్ స్థానంలో సిమెంట్ పోల్స్ వేయగలరు కావున సమస్యను తీర్చగలరని కోరుచున్నాను .	ఇనుప పోల్స్ బదులుగా సిమెంట్ పోల్స్ మార్చడానికి ఎస్టిమేట్ వేయడం జరిగినది మరియు మంజూరు కూడా చేయడం జరిగినది, పోల్స్ కూడా ఆ ప్రదేశానికి తరలించడం జరిగినది త్వరలో పని కూడా పూర్తి చేయడం జరుగుతుంది.

రిటైల్ సప్లయ వ్యాపారముకోసము 2025-26 ఆర్థిక సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు దరల ప్రతిపాదనలు & క్రాస్సబ్సిడీ సర్పార్జీ ప్రతిపాదనలు పై ఓస రవీందర్ S/O. ఎర్రన్న, గ్రామం: నల్లేఱ్ఱుర్తి, మండలం: మాముడా తాలూక: నిర్మల్ గారి సూచనలు/సలహాలకు సమాధానాలు.

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TGNPDCL - సమాధానాలు
1.	<p>నేను ఓస రవీందర్ S/O. ఎర్రన్న చిరునామా సెల్ నెం.9346385102 ఇంటి. నెం.33 గ్రామం: నల్లేఱ్ఱుర్తి మండలం: మామడ తాలూక్:నిర్మల్ విద్యుత్ స్తంభం యొక్క పోలు యొక్క సపోర్ట్ వైరుకు నిరోధకాన్ని అమర్చకపోవడం వలన విద్యుత్ భూమికి విద్యుత్ సప్లయ మాకు ప్రాణ హానిగా ఉన్నది. కావున విద్యుత్ నిరోధకాన్ని (బొక్క) అమర్చిగలరని మనవి.</p> <p>సర్వే నెంబర్:156, విద్యుత్ కనెక్షన్ నెం. 113</p>	<p>ఓస రవీందర్ S/O. ఎర్రన్న చిరునామా సెల్ నెం.9346385102 ఇంటి. నెం.33 గ్రామం: నల్లేఱ్ఱుర్తి మండలం: మామడ తాలూక్:నిర్మల్ సర్వే నెంబర్:156, విద్యుత్ కనెక్షన్ నెం. 113 కు సంబంధించిన విద్యుత్ స్తంభం యొక్క సపోర్ట్ వైరుకు నిరోధకాన్ని అమర్చడం జరిగినది.</p>

రిటైల్ సప్లయి వ్యాపారముకోసము 2025-26 ఆర్థిక సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు దరల ప్రతిపాదనలు & క్రాస్సబ్సిడీ సర్పార్టీ ప్రతిపాదనలు పై జనగం భూమా రెడ్డి, BKS జిల్లా కేశోధికారి, ఇంటి నెం 2-48/2, గ్రామం: మొగ్గ పాల్ మండలం: మొగ్గ పాల్ జిల్లా: నిజామాబాద్ గారి సూచనలు/సలహాలకు సమాధానాలు.

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TGNPDCL - సమాధానాలు
1.	<p>నేను జనగం భూమా రెడ్డి S/o రాములు R/O మొగ్గ పాల్ మండలం మొగ్గ పాల్ జిల్లా నిజామాబాద్ -503230 సెల్ నెం. 9866423384 గౌరవ ERC వారి సానుకుల దృకధం వల్ల రైతులతో పాటు ఇతర వినియోగ దారులకు మెరుగైన సాదుపాయలు అందిచడంలో కృతకృత్య లవుతున్నందున TGERC వారికి మరియు వారి సిబ్బందికి ధన్యవాదములు.</p> <p>మాది సిరుపురు గ్రామం లో 16HP Transformer కలదు. దానికి Over load కారణంగా సరిగ నడవడం లేదు దానికి 4 కనెక్షన్స్ కలవు. దీనిని 25HP గా మర్పిడి చేసి ఇవ్వాలి. దాని కారణంగా 4 కనెక్షన్స్ మోటర్లు నడుస్తాయి. దయచేసి 16HP Transformer ని తొలగించి. 25H P Transformer బిగించాలి.</p>	<p>జనగం భూమా రెడ్డి ఇచ్చిన పిర్యాదు మేరకు ADE /OP /నిజామాబాద్ రూరల్ గారు AAE/OP/మొగ్గ పాల్ తో కలిసి నాలుగు వ్యవసాయ పంప్ సెట్ల కనెక్షన్లు వున్న 16 KVA DTR (Sirpur SS-205) ప్రదేశాన్ని క్షేత్రస్థాయి పరిశీలన చేయడం జరిగినది.</p> <p>ఈ పరిశీలనలో 3 వ్యవసాయ పంప్ సెట్లు కనెక్షన్స్ నడుస్తున్నాయి కానీ ఒక వ్యవసాయ పంప్ సెట్ కనెక్షన్ బోర్ బావి కూలిపోవడం వలన పంట ప్రారంభం నుండి నడవడం లేదు అని తెలిసినది.</p> <p>శ్రీ-పేజ్ DTR కెపాసిటీ నీ 16 KVA నుండి 25 KVA కి పెంచడానికి WBS No. T-2401-04-04-01-03-048 ఎస్టిమేట్ వేయడం జరిగినది.</p>

రిటైల్ సప్లయి వ్యాపారముకోసము 2025-26 ఆర్థిక సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు దరల ప్రతిపాదనలు & క్రాస్సబ్సిడీ సర్పార్టీ ప్రతిపాదనలు పై ఇప్పి రాజేందర్ గ్రామం: ధర్మారం మండలం: కోరుట్ల జిల్లా: జగిత్యాల గారి సూచనలు/సలహాలకు సమాధానాలు.

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TGNPDCL - సమాధానాలు
1.	Regulation 4 of 2013 DTR వరకు డిస్కంల బాధ్యత ఉంది. కానీ ప్రతి Agl. Estimation DTR HT line Include చేసి - ORC చెల్లించ మంటున్నారు. దీనివల్ల రూపాయలు లక్షల్లో Estimation పెరుగుతోంది. కావున ప్రతి కనెక్షన్ కు ఎక్కువ ఎక్కువ త్రీ 3 poles దానికి సంబంధించి మెటీరియల్ ఇస్తూ కనెక్షన్ రిలీజ్ చేస్తూ వాడిన మెటీరియల్ సామాను వివరాలు ఇవ్వాలి.	మెమో నెం. CGM(C)/GM(C)/DE(C)/ADE(C)/AE(C)/D.నెం.676/16-17, తేదీ. 01-11-2016 ద్వారా డిపార్టుమెంట్ వారు జారీ చేయబడిన ఆదేశాల ప్రకారం వ్యవసాయ సర్వీసులు ఇవ్వడం కోసం టి.జి.యన్.పి.డి.సి.యల్ చేపట్టిన వ్యయానికి సంబంధించిన అంచనా (Estimate) లో HT లైన్, LT లైన్ మరియు DTR ప్రతి సర్వీసుకు Rs. 50,000/- నుండి Rs. 75,000/- వరకు, అంచనా (Estimate) లో LT లైన్ మాత్రమే ఉంటే ప్రతి సర్వీసుకు Rs, 32,000/- నుండి Rs. 45,000/- వరకు పెంచడం జరిగింది. ఒక వేల అంచనా (Estimate) లో పైన చెప్పిన దాని కంటే డిపార్టుమెంట్ చేసే ఖర్చు కంటే ఎక్కువగా ఉంటే మిగిలిన మొత్తాన్ని (ORC) డిమాండ్ నోటీసు రూపంలో వినియోగదారులకు తెలియజేస్తారు, దానితో పాటు మెటీరియల్ జాబితా మరియు తెలుగు ఫార్మాట్ లో లైన్ స్కెచ్ కూడా పంపబడుతుంది.
2.	రైతువారిగా పోషించుకొని పశు సంపదకు (వ్యవసాయ అనుబంధ సే ద్రియం కొరకు వ్యవసాయి ఉచిత విద్యుత్ కనెక్షన్ ఉన్న చోట పశుపోషణకు కూడా ఉచితంగా విద్యుత్ వాడుకొనే అవకాశం ఇవ్వాలి.	గౌరవనీయమైన కమిషన్ వారు తేదీ 28.10.2024 నాడు జారీ చేసిన టారిఫ్ ఆర్డర్ 2024-25, ధరల నియమ నిబంధనలు ప్రకారం పశు పోషణకు వాడుకునే విద్యుత్ వ్యవసాయ విభాగం క్రింద పరిగణించబడదు. కావున వ్యవసాయి ఉచిత విద్యుత్ కనెక్షన్ ఉన్న చోట పశుపోషణ కు కూడా ఉచితంగా విద్యుత్ వాడుకొనే అవకాశం ఇవ్వాలి అనే అంశం గౌరవనీయమైన కమిషన్ వారి పరిధిలోనిది.

రిటైల్ సప్లయి వ్యాపారముకోసము 2025-26 ఆర్థిక సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు దరల ప్రతిపాదనలు & క్రాస్సబ్సిడీ సర్పార్టీ ప్రతిపాదనలు పై శ్రీ .యం.హనుమంత్ రెడ్డి గ్రామం: వెంకటాపూర్ మండలం: సారంగాపూర్ జిల్లా: నిర్మల్ గారి సూచనలు/సలహాలకు సమాధానాలు.

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TGNPDCL – సమాధానాలు
1.	మీతో మనవి చేయునది ఏమనగా యం.హనుమంత్ రెడ్డి సర్వే నెం. 24 లో గల స్తంభము శిథిలావస్థకు చేరింది కావున దాని ద్వారా చేనులో వ్యక్తులకు కరంటు షాక్ వస్తుంది ప్రాణపాయం జరుగుటకు వీలుంది. కావున ఈ సమస్యను వెంటనే తీర్చగలరని మనవి చేయుచున్నాను.	స్తంభము మార్చడానికి WBS T-2401-14-01-03-05-009 నంబర్ ద్వారా అంచనాను (Estimation) వేయడం జరిగినది. పొలంలో ఇప్పటికీ పంటలు ఉన్నందున పని చేయలేకపోతున్నాము, పంట కొత అయిన పిదప పని పూర్తి చేయడం జరుగుతుంది.

రిటైల్ సప్లయి వ్యాపారముకోసము 2025-26 ఆర్థిక సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు దరల ప్రతిపాదనలు & క్రాస్సబ్సిడీ సర్పార్టీ ప్రతిపాదనలు పై కథం పెంటయ్య S/O కిషన్ రావు గ్రామం: ఆరెపల్లి మండలం: డిచ్ పల్లి జిల్లా: నిజామాబాదు గారి సూచనలు/సలహాలకు సమాధానాలు.

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TGNPDCL – సమాధానాలు
1.	నేను కథం పెంటయ్య S/O. కిషన్ రావు గ్రామం :ఆరెపల్లి మండలం: డిచ్ పల్లి నిజామాబాదు జిల్లా సెల్ నెం. 9000666551 మాది ఆరెపల్లి గ్రామాల్లో 100 H.P. ట్రాన్స్ఫార్మర్ కలదు దాని పైన 22 కనెక్షన్స్ కలవు. దాని పైన ఓవర్ లోడ్ కారణంగా తరచుగ ట్రాన్స్ఫార్మర్ రిపేర్లు చేయాల్సి రావడం. రైతులకు ఇబ్బంది కలుగుతుంది. దీన్ని ద్రుష్టి పెట్టుకొని 50 H.P కేటాయించి ఓవర్ లోడ్ తొలిగించమని కోరుచున్నాం దీని ద్వారా రైతులకు కలుగుతున్న ఇబ్బందులు దూరం చేయాలని కోరుచున్నాం.	కథం పెంటయ్య గ్రామం: ఆరెపల్లి మండలం: డిచ్ పల్లి, పిర్యాదు మేరకు SS-03, 100KVA DTR , రెండు LT లైన్ ఫీడర్లతో నడుస్తున్న లోడ్స్ మొదటి ఫీడర్లో లోడు IR-53.4A, IY-52.1A, IB-53.4A మరియు రెండవ ఫీడర్ లో లోడు IR-52.1A, IY-51.8A, IB-53.9. 3 మోటార్లు బాడీ పాక్ అవ్వడం వలన DTR 10.02.2025న కాలిపోయినది. DTRలో 3 Nos అనధికార బోర్ బావుల లోడ్స్ ను తీసివేసి 13.02.2025 న రీఫ్లేస్ చేయబడింది. ఇప్పుడు 3 Nos. అనధికార వినియోగదారులు కొత్త 3 Agl సర్వీస్ కనెక్షన్లను దరఖాస్తు చేసుకోవడానికి ముందుకు వచ్చారు. అందువల్ల, Agl దరఖాస్తులను స్వీకరించిన తర్వాత ఎస్టిమేట్ వేసి డిపార్టుమెంటు రూల్స్ ప్రకారం పని చేపట్టడం జరుగుతుంది.

రిటైల్ సప్లయ వ్యాపారముకోసము 2025-26 ఆర్థిక సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు ధరల ప్రతిపాదనలు & క్రాస్సబ్సిడీ సర్పార్టీ ప్రతిపాదనలు పై Sri K. Raju, హనుమకొండ, గారి సూచనలు/సలహాలకు సమాధానాలు.

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TGNPDCL - సమాధానాలు
1.	<p>రాష్ట్రంలో విద్యుత్ రోజువారీ డిమాండ్ అనూహ్యంగా పెరుగుతోంది. వేసవికి ముందే అత్యధిక డిమాండ్ నమోదవుతోంది. నిరంతర విద్యుత్ సరఫరాకు గాను రోజు డిస్కంలు భారత ఇంధన ఎక్స్చేంజి (IEX) లో పెద్ద ఎత్తున కరెంటు కొనుగోలు చేస్తున్నాయి. అధిక డిమాండ్ కారణంగా ఒక యూనిట్ కై దాదాపు రూ. 10 వరకు చెల్లించి కొంటేనే నిరంతర విద్యుత్ సరఫరా సాధ్యపడుతోంది.</p> <p>గత నెలలో రాష్ట్రచరిత్రలోనే అత్యధిక డిమాండ్ 16,293 మేగావాట్లు నమోదైంది. ఎప్పుడు మార్చిలో అత్యధిక డిమాండ్ నమోదైయ్యేది. ఈ ఏడాది ఫిబ్రవరిలోనే పరిస్థితి ఇలా ఉంది. దీనిపై డిస్కంలు ఎటువంటి కార్యాచరణ అవలంబిస్తున్నాయి. IEX నుంచి డిమాండ్ తక్కువున్న సమయంలో యూనిట్ కు రూ. 2, 3 కు కొనుగోలు చేయాలి ఆర్థిక భారం తగ్గించుకోవాలి. సగటు యూనిట్ కు కొనుగోలు ధరను తగ్గించాలి.</p>	<p>రాబోయే వేసవిలో అధిక డిమాండ్ను తట్టుకోవడానికి అనేక నివారణ చర్యలు చేపట్టడమైనది.</p> <p>1. 33/11KV సబ్స్టేషన్లలో 2MVAR కెపాసిటర్ బ్యాంకులు ఏర్పాటు చేయబడ్డాయి మరియు లోడ్లు ఎక్కువగా ఉన్న 11KV లైన్లలో 600KVAR కెపాసిటర్ బ్యాంకులు ఏర్పాటు చేయబడ్డాయి, దీని కారణంగా లోడ్లు తగ్గుతాయి మరియు వోల్టేజీ ప్రొఫైల్ మెరుగుపడుతుంది.</p> <p>2. కేంద్ర ప్రభుత్వం పెద్ద ఎత్తున సౌర విద్యుత్తును ఉత్పత్తి చేయడానికి కొత్త పథకం PM KUSUM ను ప్రవేశపెట్టింది. అన్ని సూపరింటెండింగ్ ఇంజనీర్లు/ఆపరేషన్లు మరియు డివిజనల్ ఇంజనీర్లు/ఆపరేషన్లకు, వ్యవసాయ భూములలో సౌర విద్యుత్ ప్లాంట్లను ఏర్పాటు చేయడానికి సౌరశక్తి ఉత్పత్తిపై ఆసక్తి ఉన్న వ్యక్తులను గుర్తించడానికి మార్గదర్శకాలు ఇవ్వబడ్డాయి. రైతులను ప్రోత్సహించడానికి ప్రభుత్వం తక్కువ వడ్డీ రేట్లకు రుణాన్ని కూడా మంజూరు చేస్తోంది.</p> <p>3. పిఎం కుసుమ్ పథకంలో కూడా ప్రభుత్వం రైతులకు సబ్సిడీ అందించడం ద్వారా మరియు పవర్ గ్రిడ్ పై భారాన్ని తగ్గించడం ద్వారా సౌర పంపు సెట్లను మంజూరు చేస్తోంది.</p>

		<p>4. అలాగే ప్రధానమంత్రి సూర్యగడ్డ పథకంలో ప్రభుత్వం గృహ వినియోగదారులకు వారి ఇళ్లకు సోలార్ ప్యానెల్లను ఉంచడానికి సబ్సిడీని అందిస్తోంది, ఇది పవర్ గ్రిడ్పై భారాన్ని కూడా తగ్గిస్తుంది.</p> <p>5. అలాగే ISI మార్క్ ఉన్న ఫైవ్ స్టార్ రేటింగ్ ఉపకరణాలను మాత్రమే ఉపయోగించాలని, వ్యవసాయ పంపు సెట్లకు కెపాసిటర్లను ఉపయోగించాలని, దీని ద్వారా విద్యుత్తును ఆదా చేయాలని అనేక అవగాహన కార్యక్రమాలు నిర్వహించబడతాయి.</p>
2.	సోలార్ విద్యుత్ వినియోగంపై ప్రజల్లో విస్తృత ప్రచారం నిర్వహించాలి సబ్సిడీలను పెంచాలి	తెలంగాణ రాష్ట్రంలో RE పవర్ కోసం నేడల్ ఏజెన్సీ అయిన TGDSCOMలు మరియు TGREDCO రథయాత్రలు, కరపత్రాలు, అవగాహన కార్యక్రమాలు మొదలైన వాటి ద్వారా సౌరశక్తి వినియోగం వైపు వినియోగదారులను ప్రేరేపించడానికి అనేక చర్యలు తీసుకుంటున్నాయి.
3.	విద్యుత్ పొదుపుపై ప్రజల్లో అవగాహన కలిగించే కార్యక్రమాలను పెంచాలి.	విద్యుత్ పొదుపుపై పోలం బాట, విద్యుత్ భద్రతా వారోత్సవాలు వంటి అనేక అవగాహన కార్యక్రమాలు తరచుగా నిర్వహించడం జరుగుతున్నది. ఐఎస్ఐ మార్క్ ఉన్న ఫైవ్ స్టార్ రేటింగ్ ఉపకరణాలను మాత్రమే ఉపయోగించాలని, అన్ని వ్యవసాయ పంపు సెట్లకు కెపాసిటర్లను ఉపయోగించాలని తద్వారా విద్యుత్ ఆదా ఎలా అవుతుందో వినియోగదారులకు అవగాహన కల్పిస్తున్నాము, దీని ద్వారా విద్యుత్ వినియోగం తగ్గుతుంది, డిమాండ్ తగ్గుతుంది.
4.	టెక్నాలజీ ఇంత పెరిగినా తరచుగా విద్యుత్ ప్రమాదాలు జరుగుతున్నవి వీటిని పూర్తిగా నిర్మూలించాలి. నష్ట పరిహారాన్ని పెంచి త్వరితగతిన బాధితులకు అందించాలి.	విద్యుత్ ప్రమాదాలను నివారించడానికి అనేక కార్యక్రమాలు నిర్వహించడం జరుగుతున్నది. ప్రతి జిల్లాలో డివిజనల్ ఇంజనీర్ హోదాలో ఒక అధికారిని భద్రతా అధికారిగా

		నియమించడం జరిగినది, అతను రైతులతో తరచుగా కార్యక్రమాలు నిర్వహిస్తాడు మరియు విద్యుత్ ప్రమాదాలను ఎలా నివారించాలో వారికి అవగాహన కల్పిస్తారు.
5.	పరిశోధనల ప్రకారం వినియోగదారులకు అందిస్తున్న విద్యుత్ సరఫరా సేవల నాణ్యత ఎలా పెంచబడుతుంది.	వినియోగదారులకు నాణ్యమైన మరియు నమ్మకమైన విద్యుత్ సరఫరాను అందించడానికి SCADA, డిస్ట్రిబ్యూషన్ ఆటోమేషన్ కంట్రోల్ సిస్టమ్స్ (DACS) వంటి అనేక కొత్త సాంకేతికతలను ప్రవేశపెట్టడం జరిగినది.
6.	ఎక్కువ సమయం విద్యుత్ సరఫరా నిలిపివేసినప్పుడు వినియోగదారులకు నష్టాలు భర్తీ చేయబడుతాయా ?	సాధారణంగా సరఫరాకు ఎక్కువ సమయం అంతరాయం ఉండదు, ఏదైనా సందర్భంలో ఎక్కువ సమయం సరఫరాకు అంతరాయం కలిగితే, విద్యుత్ సరఫరాలో అంతరాయం గురించి వార్తాపత్రికలలో ముందుగానే తెలియజేయబడుతుంది.
7.	గ్రిడ్ మేనేజిమెంట్ ఎలా జరుగుతుంది.	డిస్కం స్థాయిలో, రాష్ట్ర మరియు కేంద్ర స్థాయిలో ఉన్న లోడ్ డిస్పాచ్ కేంద్రాలు (LDC) విద్యుత్ సరఫరా స్థితిని 24 గంటలూ పర్యవేక్షిస్తాయి. ఈ LDC కేంద్రాలు విద్యుత్ డిమాండ్ మరియు సరఫరాను పర్యవేక్షిస్తాయి మరియు విద్యుత్ సరఫరా వినియోగంపై ఎప్పటికప్పుడు క్రింది స్థాయి వరకు సూచనలను అందిస్తాయి.
8.	ముఖ్యమైన ప్రాంతాల్లో విద్యుత్ లోపాలు నివారించడానికి ఎలాంటి చర్యలు తీసుకుంటున్నారు.	ప్రధాన సరఫరా విఫలమైతే ప్రత్యామ్నాయంగా వేరే ఫీడర్ ద్వారా అన్ని ముఖ్యమైన ప్రదేశాలకు ప్రత్యామ్నాయ సరఫరాను అందించడం ద్వారా ఆసుపత్రులు, కలెక్టర్ కార్యాలయాలు వంటి ముఖ్యమైన ప్రదేశాలకు సరఫరాను అత్యంత జాగ్రత్తగా నిర్వహిస్తున్నాము.
9.	భవిష్యత్ విద్యుత్ ఉత్పత్తి కోసం సౌర మరియు గాలి శక్తి వినియోగం పెంచడానికి ఎటువంటి ప్రణాళికలు ఉన్నాయి.	తెలంగాణ ప్రభుత్వం - ఇప్పటికే తెలంగాణ క్లిన్ అండ్ గ్రీన్ ఎనర్జీ పాలసీని జారీ చేసింది, దీనిలో FY30 మరియు FY35 లకు సౌర మరియు పవన శక్తి లక్ష్యాలను నిర్దేశించారు.

10.	2025-2030 లక్ష్యలకోసం ఎలక్ట్రిసిటీ రంగంలో ఎలాంటి సాంకేతిక పరిజ్ఞానం తీసుకురానున్నారు.	అన్ని 33/11KV SS ల ఆటోమేషన్ 11KV & 33KV ఫీడ్లను రియల్ టైమ్ ప్రాతిపదికన పర్యవేక్షించడానికి మరియు నియంత్రించడానికి వీలు కల్పిస్తుంది. ఈ వ్యవస్థ అంతరాయ వ్యవధిని తగ్గిస్తుంది, వ్యవస్థ యొక్క ఆరోగ్యకరమైన భాగం నుండి తప్పు విభాగాలను వేరు చేస్తుంది.
11.	ఇన్వెస్ట్మెంట్ విద్యుత్ రంగంలో పెట్టుబడులు పెట్టేందుకు ప్రోత్సహించేందుకు చర్యలు తీసుకోవడం పై ఏదైనా ప్రణాళిక ఉందా.	తెలంగాణ ప్రభుత్వం ఇప్పటికే "తెలంగాణ క్లీన్ అండ్ గ్రీన్ ఎనర్జీ పాలసీ-2025" ను జారీ చేసింది, ఇక్కడ RE ప్రాజెక్టులకు వివిధ ప్రోత్సాహకాలను ప్రతిపాదించారు.
12.	విద్యుత్ రంగంలో సామాజిక భాద్యతను పెంచడానికి యాజమాన్యాలు ఏ విధంగా ప్రయత్నిస్తున్నాయి	క్రమం తప్పకుండా శిక్షణ కార్యక్రమాలు/సమావేశాలు నిర్వహించబడతాయి. శిక్షణ/సమావేశాల సమయంలో ఉద్యోగులు వినియోగదారులతో మర్యాదగా వ్యవహరించాలని సూచించడం జరుగుతుంది. ప్రతి నెలా రూ. 3,20,000/- అనాథ గృహాలు, వృద్ధాశ్రమాలు, శారీరకంగా మరియు మానసికంగా వికలాంగులైన పిల్లలు వంటి (16) సేవా సంస్థలకు ఉద్యోగుల జీతం నుండి ఒక్కొక్కరికి రూ. 20,000/- చొప్పున విరాళంగా ఇస్తున్నారు.
13.	విద్యుత్ పొదుపుకు సంబంధించి TGNPDCL విద్యుత్ భవన్ హనుమకొండ కార్యలయం మరియు విద్యుత్ కార్యలయాలు విద్యుత్ ఏమైనా పొదుపు చేస్తున్నాయా ఖర్చు, ఆర్థిక భారం, తగ్గించుకుంటున్నాయా?	విద్యుత్ పొదుపుకు సంబంధించి TGNPDCL పరిధిలోని అన్ని కార్యాలయాలలో చర్యలు చేపట్టడం జరుగుతున్నది మరియు ఆర్థిక భారాన్ని తగ్గించుట కొరకు అన్ని రకాల చర్యలు తీసుకోవడం జరుగుతున్నది.
14.	ప్రభుత్వ 200 యూనిట్లు పథకానికి సంబంధించి ఎవరు అర్హులు? వారిని ఎలా గుర్తిస్తారు ఉచిత విద్యుత్ పథకానికి అర్హుడు కావాలంటే వినియోగదారుని వీధి ఏమిటి?	ఆహార భద్రతా కార్డు (వైట్ రేషన్ కార్డ్), ఆధార్ కార్డు ఉన్న వినియోగదారులు గృహ జ్యోతి పథకానికి అర్హులు, వారి సగటు నెలవారీ వినియోగం 200 యూనిట్లకు సమానంగా లేదా అంతకంటే తక్కువగా ఉండాలి.

		రాష్ట్ర ప్రభుత్వం ప్రకటించిన తేదీ తర్వాత వినియోగదారులు ప్రజా పాలన కేంద్రాల్లో గృహ జ్యోతి పథకానికి దరఖాస్తు చేసుకోవాలి.
15.	మెరుగైన విద్యుత్ సరఫరా కోసం ఖాళీలను వెంటనే భర్తీ చేయాలి.	వివిధ కేడర్లలో ఖాళీలను భర్తీ చేయడానికి ఒక ఉద్యోగ క్యాలెండర్ తయారు చేయబడింది మరియు తెలంగాణ ప్రభుత్వానికి సమర్పించబడింది. అయితే, తెలంగాణ రాష్ట్రంలో పెడ్యూల్డ్ కులాల ఉప-వర్గీకరణ కారణంగా, వివిధ కేడర్లకు నియామకాలు TGNPDCLలో వాయిదా వేయబడ్డాయి. పెడ్యూల్డ్ కులాల ఉప-వర్గీకరణ పూర్తయిన తర్వాత, పైన చెప్పినట్లుగా నియామకాలు చేపట్టబడతాయి.
16.	ARRల వివరణ యొక్క బహిరంగ ప్రకటన అత్యధిక సర్క్యూలేషన్ గల పత్రికలలో ఇవ్వగలరని కోరుతున్నాం	ARR కు సంబంధించిన బహిరంగ ప్రకటనలను అత్యధిక సర్క్యూలేషన్ గల పత్రికలు తెలుగులో రెండు పత్రికలు, ఇంగ్లీషులో రెండు పత్రికలు, ఉర్దూలో ఒక పత్రిక లలో ఇవ్వడం జరుగుతుంది. అలాగే మీరు చెప్పిన ప్రకారం ప్రతి ARR బహిరంగ విచారణకు పైలాగే ఇస్తామని తెలియపరుస్తున్నాము.

Response to PV Subbareddy

PV Subbareddy, 2-2-24/302, DD Colony, Hyderabad – 500 013, Email: unconsultgroup@gmail.com		
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	Disruption in agl supply for various reasons persist. The quality,assured supply especially in critical stages of crop production to be ensured and discoms to be directed for detailed operational, supervisory guidelines	The Licensee considered agricultural consumers as an important consumer category and strives to supply quality and uninterrupted power supply. For agricultural sector, reliable and quality power supply is being maintaining and utmost care is being taken in NPDCL
2	The service deficiency, violation of SOP in DTR, supply disruption,release of new agl connections, is recurring in spite of submission time and again	Sufficient Rolling Stock Healthy transformers are available and maintained. Strictly following SOP norms towards replacement of failed DTRs. Licensee submits that service deficiency is being tackled at a wars footing on a best effort basis. Further any deviation of SOP for releasing of AGL services is due to Right of way problems raised by adjacent consumers/farmers, Standing crops and Forest objections etc. only.
3	The estimates for Agl is increased,and the supply of free poles of 3 is not adhered to. For the past many years (from when DD was Rs. 350 to Rs. 6000 for an AGL), up to three poles were installed for the farmer who paid DD. Currently, they are not installed. We request that such three poles be provided	It is to inform that the estimate cost varies based on material required to release the service only and is worth of subsidy amount of Rs.45,000/- (for LT network expansion), Rs.70,000/- (for DTR involvement cases) are deducted from the estimate and is in force and not the creteria of 3 poles.
4	Reg 4-2013 states that transformers should not be included in the estimate. Therefore, we request that the transformer be removed from the estimate.	As per the department rules instructions issued vide reference Memo No.CGM©/GM©/DE©/ADE©/AE©/D.No.676/16-17,Dt.01-11-2016. The expenditure for releasing of AGL services incurred by TGNPDCL from 26-10-2016 is enhanced for the estimate involving HT line, LT line and DTR worth Rs.50,000/- to 70,000/- per service whereas

		<p>the estimates involving only LT line is enhanced from Rs.32,000/- to Rs.45,000/- per service.</p> <p>If estimate cost exceeds the subsidy amount, the balance amount (ORC) will be intimated to the consumers in the form of demand notice along with material list and line sketch in telugu format.</p> <p>The consumer has to pay Development Charges of Rs.1200/- per KW Security Deposit Rs.60/- per HP, Registration charges Rs.25/- and Service Connection Charges Rs.25/- per HP as per Tariff Order.</p> <p>Further, it is to inform that estimate cost varies based on material required to release the service only and worth of subsidy amount is deducted from each estimate against each application in force.</p>
5	In the current estimate, about 20,000 is being charged for the transformer block. But the farmers themselves are constructing such transformer blocks at their own expense. The contractors,vendors are resorting to corruptive practices .This is happening in most of the agl cases (agl blocks). Therefore, pl remove the transformer block from the estimate and give additional material / costs to the farmer for such works.	<p>After sanction of the estimate ,the work was awarded to the contractor/Vendor by the Department .That contactor is constructing the Transformer plinth (Block) as per standards.</p> <p>After completion of the works the Quality Control wing of TGNPDCL is inspecting the works and check as per the standards.</p>
6	We request that the date of release of connection to the AGL farmer and the material list submitted by the department be sent to those farmers through WhatsApp and by letter.	<p>The licensee is sending the list of material, sketch and demand notice in Telugu format to the consumer mobile through SMS and link.</p> <p>Already service releasing information with date and services is being sent to consumer through SMS.</p>
7	When a farmer applies for an AGL connection, he is told that neighboring farmers are not allowed to lay the line, so he is not given a connection, and is told that he should talk to that neighboring farmer himself. It is requested that the department to take up this responsibility.	Generally, new AGL 11KV and LT lines will be laid road side or boundaries of Agriculture fields, based on ground situation, duly following Electricity Act guide lines on laying of lines.

	In such instances the poles should be laid along the roads and boundaries, not in the middle of the field.	The right of way for erection of poles for release of new connection is under the scope of applicant only.
8	Several DTRs are in the midst of crops, cultivating land, is prone for accidents. Such DTRs to be relocated sumoto without request of farmers,	Shifting of DTRs will be considered as per the procedure in vogue.
9	Safety measures and network upgradation is at snail pace ,snapped wires,Lack of AB switch,low hanging cables is a common scene	Regularly the defects (loose lines, leaned poles, low transformer plinths etc.,) noticed in the existing distribution network of 33KV, 11KV and LT lines are being rectifying and every care is being taken to provide reliable, quality and un-interrupted power supply to Agriculture sector. From the above the accidents were reduced by 16% over on the year.
10 (a)	Section 126 is acted upon arbitrarily . Sec (5) If the assessing Officer reaches to the conclusion that use of electricity has taken place ,the assessment shall be made for entire period during which such unauthorised use of electricity has taken place and if however,the period. During which such unauthorised use of electricity has taken place cannot be ascertained, such Period shall be to a period of 12 months immediately preceding the date of inspection. This regulation is not adhered and assessment done arbitrarily .The above clause itself untenable in the absence of evidence.	a) As per amended GTCS approved by Honorable TGERC, under GTCS Clause 9.3.2.9 - " If the assessing officer reaches to the conclusion that unauthorized use of electricity has taken place, the assessment shall be made for the entire period during which such unauthorized use of electricity has taken place and if, however, the period during which such unauthorized use of electricity has taken place cannot be ascertained, such period shall be limited to a period of twelve months immediately preceding the date of inspection in accordance with Section 126 (5) of the Act24." A provision is also incorporated in GTCS under clause 9.4.1 for making a representation by the consumer to the Final Assessing officer on the Provision Assessment order. Further, the consumer can make an appeal to the Appellate Authority on the final assessment amount as per GTCS clause 9.5.1. The TGNPDCL is following the above GTCS condition scrupulously. The inspecting officers are also booking cases for less than 12

		months if the actual period of unauthorized use is found to be less than 12 months as per local enquiry.
10 (b)	<p>Unauthorised usage cases are registered en masse. Several instances of cases for dairy, agriculture were booked. Animals are integral part of Farming, with focus in safe organic food and is going to be revolution. Dairy animals up to 6 animals in the rural areas, to be treated as agriculture. In all agl cases advisory notices to be issued quoting the regulatory guidelines since the rules are not made aware widely. Only in repeated offences, cases are to be booked</p>	b) As per the tariff order issued by Honorable TSERC, dairy farming activity is not part of agricultural activity.
8	<p>The poultry sector repeatedly facing threats and on the brink of collapse. The tariff for poultry is to be reviewed downwards.</p>	The Licensee has determined the tariffs considering the requirements of the consumer category coupled with the cost of service incurred by the Licensee to serve said consumer categories. However the Licensee shall abide by the directions of the Hon'ble Commission.
	Accidents	
a)	<p>Electrical accidents are very common and uncontrollable in Telangana. Human deaths are occurring at a rate of about two per day, which is more than 500 per year. Livestock deaths are also high. According to information, during the period 2014-2020, more than 5,000 deaths occurred in Telangana, in which young people aged 18-35 lost their lives, which reflects the severity of the accident. Our field observations revealed the following important reasons for such a high number of incidents:</p> <p>*Due to the strong belief among farmers that when there is an interruption in the agricultural supply, there will be no immediate solution from the DISCOM, farmers are taking the risk of their lives for the repair and restoration of supply on their own.*</p> <p>A case to substantiate is</p> <p>During 2024, the electricity outages are very severe, especially in the villages of Kalivemula, Charlagudem and Topuguda, where farmers said that there are more than 20 interruptions per day.</p> <p>For example: We regret to bring to your attention the seriousness of the electrical accident incident on 28 March 24 in Kalivemula village,</p>	<p>(a) The defects available in distribution network i.e., leaned poles, damaged poles, loose lines, low clearance, road crossings, low transformer plinths etc., are being identifying in the field and its rectification is being taken up duly procuring men and materials, to avoid electrical accidents.</p> <p>From the above the accidents were reduced by 16% over on the year.</p>

	<p>Kandi mandal, Sangareddy district. In this incident, a 45-year-old man named Chelimeti Mallareddy died in very pitiful circumstances during the repair of an agricultural transformer fee.</p> <p>This untimely death has not only shocked the family but also the region. The deceased in the affected family had a son suffering from kidney disease and was dependent on dialysis. There were also women in the family who were dependent on the employer. The family was left on the road due to the untimely death. The reason for this is the lack of electricity supply and negligence of the company management..</p> <p>Before forgetting the death of another young man in the same village, another accident is regrettable.</p> <p>The data reveals the seriousness of losing precious human lives and livestock. The fatal cases are mostly that of the farmers.</p> <p>For the sake of our luxury needs, lives cannot be an investment.</p> <p>The disturbing fact is that they are caused by short comings of Discoms.</p> <p>Even in such matters, the victims are not shown empathy.</p>	
b)	<p>Claim applications are pending for more than two years in suryapet and Khammam districts inspite of referring to senior officers.</p> <p>There is bureaucratic hurdle for registration of accidents, abnormal delay in settlement of claims.</p> <p>It should be directed to register an accident case instantly on mere report. Process may await compliance of requirements.</p> <p>The family certificate, legal heirs certificates are made preconditions even for registration of accident claims.</p> <p>In fact family certificates have no legal or administration standing.</p> <p>Hon. Commission direct to settle claims by conducting a panchanama, affidavits, and verification of ration cards which the State govt is also following for family members</p>	b) & (c) Every care is being taken to arrange payment of ex-gratia to the effected persons within short period duly guiding concerned to produce all required documents. Every care is being taken to minimize accidents to both Human beings and animals in the field.
c)	<p>Zero tolerance accidents, to claim settlement to be directed with a clear time frame of 3 months.</p> <p>In cases of the fatal accidents accountability of the concerned staff to be fixed and criminal cases are to be filed.</p>	The DISCOMs are striving towards ZERO fatal accidents.
d)	Due to overloading of linemen work, skill gap, farmers are resorting to repair by themselves	(d) Regular training programmes are being arranging to field staff. Necessary safety appliances i.e., ED rods,

	<p>It is very sad that low-level employees working in the field are dying. They should be given proper training and safety items should be given. It is requested to take action to ensure that they are worn. Without line clearance, the repair of personnel should be controlled. The staff should have a line map and DTR location map. We request that doing electrical work with local people should be completely banned and that higher authorities should monitor it.</p>	<p>Helmet, Non-contact Volt Alert meters etc., is arranged to the field staff to avoid electrical accidents to departmental staff.</p> <p>Wide publicity is being arranging regularly through newspapers and educating farmers not to meddle AB switches and taken up replacement of electrical fuse wires etc., and it will be attended by the NPDCL staff only.</p>
e)	<p>Earthing must be provided to every motor and single-phase DTR from the substation. This will prevent accidents to humans and livestock. The ex-gratia paid for such deaths will also save the department money of crores of rupees.</p> <p>Heavy switches should be installed for all the existing DTRs. Similarly, even if there is a heavy switch in the estimate for new DTRs, the department should also install them.</p>	<p>(e) 11KV AB switches are being arranging to every DTR available in the AGL sector and other networks and works are under progress.</p>
f)	<p>In the villages, JLM and other electrical staff are not supporting the farmers within the standard performance limits. Another reason is the addition of other administrative responsibilities to the technical field staff.</p>	<p>(f) Instructions are issued to field staff to attend all grievances of farmers duly following NPDCL standing guidelines and norms.</p> <p>DISCOM is taking measures to strengthen the field staff to improve the services to the consumers.</p>
g)	<p>In the areas where HT lines are down, there are maintenance errors and LT lines cable connection errors. Since the HT lines cables are not at the right height, the electrical staff is also hesitant to correct the errors due to the severe current.</p>	<p>g) The defects observed in HT or LT lines are being rectifying regularly.</p>
h)	<p>The electricity department does not prominently display the toll-free numbers on every transformer, in public places, and in Panchayat areas. When electricity complaints are received, it is necessary to register them through the toll-free number immediately and only then take action like repair service. the cost of crores of rupees, a toll-free number 1800 425 3600 was created to record and resolve the problems of farmers under our SPDCL. This number worked well for some time.</p>	<p>(h) Toll free number (18004250028) and 1912 number are being displayed at all electricity offices and important public places and also being painting on every repaired transformer at SPM center and new transformers received to stores.</p> <p>Wide publicity is being arranging through newspapers to utilize the toll free or 1912 number by the consumers to</p>

	We request that such a toll-free number be re-activated and its monitoring should be done at higher level.	<p>resolve their grievances.</p> <p>The DISCOM has extend the facility of Toll Free number 1912 to rural areas also. The complaints are being received from the said toll free number and being attended by DISCOM. Wide publicity is given for consumers for registering their grievance by dialing 1912.</p>
i)	<p>When fatal electrical incident occurs, a thorough and transparent investigation should be conducted by a committee. The members of this committee should be the electrical inspector, DISCOM officer and the victim's family members.</p> <p>Many suggestions and activities for the prevention of electrical accidents have been thoroughly discussed and recommendations have been given in the ERC meetings and the DISCOM officials' meetings.</p>	<p>i) Every care being taken up to avoid electrical accidents in the field and transparent investigation is being done by Departmental officers.</p> <p>The officials of the DISCOMs are investigating the electrical accident cases and taking measures to mitigate such accidents.</p>
j)	<p>CEA Regulation 2011 Electricity Supply Safety Rules should be followed. Under your supervision, a senior officer should handle the responsibilities of accident prevention.</p> <p>Immediate steps should be taken to implement the instructions and decisions firmly at the field level.</p>	<p>(j) To minimize electrical accidents in the field, the DE/Tech of each circle is nominated as Nodal officer and various training programmes and awareness programmes are being conducting to department staff.</p> <p>The standard electricity safety rules and CEA regulations etc., are being following in the field, to prevent accidents.</p>
	Retail Supply	
1	<p>The tariff for apartments is far higher than the gated communities etc, The apartments are welfare associations with middle and lower income groups and constitute substantial number of customer base. This group also is the the prompt payers of billing.</p> <p>A separate LT category of Apartments is to be segregated with lower tariffs</p>	<p>The Licensee has determined the tariffs considering the requirements of the consumer category coupled with the cost of service incurred by the Licensee to serve said consumer categories.</p> <p>However the Licensee shall abide by the directions of the Hon'ble Commission.</p>
2	<p>Delay of BTPS, YTPS IS TO BE REVIEWED to avoid further consequential effects</p>	<p>BTPS station is commissioned and is scheduling power to DISCOMs. All units of YTPS is expected to be commissioned by the month of May 2025.</p>
3	<p>Energy efficient management vs demand side management is need of the times. AT&C losses to be curtailed</p>	<p>TGNPDCL entered an MoU with M/s.EESL on Dt: 09.07.2024 for implementation of DSM measures. As per the MoU, M/s.EESL will support the proposed DSM program through bringing in the necessary investments and technology required for providing the consumers of</p>

		<p>TGNPDCL with energy efficient appliances and equipments like Super-Efficient Air Conditioners, IE3 Motors, BLDC fans etc.</p> <p>Despite of revenue loss to the company by utilisation of Energy efficient appliances, NPDCL bounded for implementation of DSM measures in coordination with M/S.EESL as per MoU.</p> <p>TGNPDCL installed 1610 No.s 2/1MVAR capacitor banks for improvement of power factor and reduction of losses. The performance of these capacitor banks are being monitored daily from Corp. Office.</p> <p>573 No.s 600KVAR Capacitor banks are erected on max load 11KV feeders for reduction of load and line losses.</p> <p>New AGL services are being released in TGNPDCL only after providing necessary infrastructure i.e LT lines, 11KV lines and Distribution Transformers and also by ensuring fixing of 2/3KVAR capacitor at consumer AGL pump sets.</p> <p>Special drive is also being conducted for fixing of 2/3KVAR capacitors at Agl. pump sets where ever they are not available for reactive power compensation and efficient utilization of AGL pump sets.</p>
4	<p>The financial statements,balance sheet are not submitted with ARR without which the filings are infructious. Request for thorough scrutiny and balance sheet etc to be put in public domain</p> <p>The employee,administrative costs be reduced for efficiency,health of the Discoms</p>	<p>The financial statements and balance sheet of the licensee are easily accessible on the licensee's official website for public scrutiny and transparency.</p> <p>Employee and administrative expenses are calculated a nominal 10% of the base capital expenditure, with 8.5% allocated to employee costs and 1.5% to administrative expenses</p>
5	Comparative parameters and performance with the state public, private DISCOMs will facilitate framing good regulations	Your suggestion is noted.
6	The Hon Commission is requested to constitute watch dog body to oversee implementation of Commission orders, regulations	The Licensee shall abide by the directions of the Hon'ble Commission.

7	<p>According to the information of CGRFs and consumer service centers, there are many services that are beyond stipulated SOP STANDARDS.</p> <p>Such information should be provided in full details.</p> <p>Compensation should be paid to the consumers suo moto for all the cases beyond the SOP.</p>	The licensee is achieved the overall SOP.
8	<p>The discoms shown huge arrears from public agencies viz street light, irrigation, and industry. Are the discoms collecting the penalties and particular thereof to be given.</p> <p>The delay of collection results to passing on to the retail consumers in some form.</p>	<p>The Licensee is attempting to collect the outstanding dues on a best effort basis.</p> <p>As per Tariff Orders, D.P.S is being levied on Street lights, Irrigation and Industry services.</p>
9	<p>TDR, AT&C losses.</p> <p>Though nominal improvement in TD losses is shown, it was repeatedly highlighted before the commission that the losses are adjusted in agl. since no dependable methodology is adopted. Separate Metres for agl feeder, / DTR s are not installed.</p>	<p>For reduction of technical losses 11KV feeder segregation, erection of new lines 33/11KV Substations, new DTRs, load balancing, and interlinking of 33 KV Feeders etc., are being done regularly by monitoring the loads on 33KV and 11KV feeders.</p> <p>New AGL services are being released in TGNPDCL only after providing necessary infrastructure i.e LT lines, 11KV lines and Distribution Transformers and also by ensuring fixing of 2/3KVAR capacitor at consumer AGL pump sets. Special drive is also being conducted for fixing of 2/3KVAR capacitors at Agl. pump sets wherever they are not available for reactive power compensation and efficient utilization of AGL pump sets .</p> <p>In addition to the above, intensive inspections are being conducted regularly on high loss 11KV feeders for reduction of losses by attending exceptional, booking of theft cases, providing of seals to the meters etc.</p> <p>TGNPDCL using a methodology which is found to be Robust for estimation of Agricultural power consumption advised by the Indian Statistical Institute there by getting an improved and best accuracy in arriving and forecasting the agriculture power consumptions and estimations. Further a study was also conducted by ASCI in 2017 for computation of Agl. Consumption in the State of</p>

		TELANGANA wherein ASCI model computed 2.9% more than the Agl. Consumption arrived by the ISI Methodology. Hence ISI methodology is consider to be Robust methodology.
10	Whenever network works are done,there is no notification or concurrence from the concerned persons.	The notification is being issued in the local newspapers and also messages are sent to the registered mobile numbers of the consumers.
11	It is replied by Dicoms on the complains of previous orders as "shall be complied", which are long pending The Commission needs to take appropriate action for noncompliance of previous orders.	The Licensee has indicated compliance with Commissions directive in the ARR petition.
12	Distribution companies should explain the environmental protection measures,RE,and green energy. People and organizations should be encouraged to provide quick assistance to conventional power generation. There are many complaints in net metering and grid connection	The DISCOMs are educating and encouraging the consumers for installation of roof top solar plants under 100% solar villages schemes.
	CGRF	
	<p>A look at the schedules of cgrf indicate that schedules are one per month for awareness programmes The geographical coverage is also scattered.Suggest to schedule a minimum of 3 per month till all the sections are covered.</p> <p>The discoms need to mobilize the consumers,print vernacular brochures for the programmes.</p> <p>Every programme should have a slot for sop,safety measures ,toll free numbers etc</p> <p>Post adjudication, data on the details of staff lapses and action taken thereof is to be called for.</p> <p>The Commission is requested to empanel representatives of agriculture ,retail consumers as observers in cgrf proceedings as their interest is not protected due to lack of awareness and required resources.</p>	<p>CGRF is conducting 6 – 7 Nos of local Court meetings one in each section every month as against the prescribed number of 4 meetings (one/week) in a month, as per the Regulation 3 of 2015 of TGERC, with an intention of giving more awareness among the consumers and to redress the grievances of more number of consumer complaints.</p> <p>The schedule of meetings is used to be sent to the field officers to give wide spread publicity by way of communicating it to the local village Whatsapp groups, print media and village secretaries. Previously, the Sarpanches were also used to be informed.</p> <p>During these meetings, the reporters, public representatives and the consumers are being requested to give wide spread publicity regarding the functioning of the CGRF, Modes of reporting consumers' complaints to the CGRF and also the pamphlets are being distributed to</p>

		<p>them. These pamphlets have the total information such the types of complaints which the CGRF entertains, phone numbers of the members of the CGRF and the modes of reporting the consumers' complaints.</p> <p>Reporting the consumer grievances through the Toll free number 1912 and the functioning of the Vidyut Praja Vani on every Monday in every operation section, are also being informed to the consumers, public representatives and representatives of the print media.</p> <p>The field staff are being directed to be politer and have patience 'in listening to the consumers' grievances and in giving replies' to them.</p> <p>The field officers are being directed to move to one distribution in their jurisdiction, in person, every day during the morning session to know consumers' grievances directly without inviting the consumers to report their grievances by coming to their office, to know the condition of the supply network and also to alert their staff members.</p> <p>Further, the ADE is directed to conduct the meeting regularly with his AEs and staff members once in a week to know the consumer grievances and also the progress in the complaints registered with CGRF, the DE/Opn, to do the same once in 10-15 days and SE/Opn to do the same once in every 20 days for the above.</p> <p>The participants of these meetings are being given the awareness on the safety measures and SoP. Also, some of the important technical aspects such as prevention of DTR failures, importance of earthing, maintenance of batteries and chargers and avoiding of loose lines etc., are discussed with Departmental Engineers and Staff to have knowledge about them. The technical aspects are being</p>
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		covered whenever a free time is available during the meetings.																						
	DTRs																							
	<p>Failed DTRs are reported at 15647 against total 22357.It is to be examined with reference to the industry norms,quality.</p> <p>Discoms shown transporting 70 % of failed DTRs.What are the reasons for other 30%.</p> <p>It gives an inference that they are transported by agl consumers at their own cost,the fact of which was discussed in the public hearings time and again.</p>	<p>%Failed DTR transportation Comparison with previous FY is as follows</p> <table><tr><th rowspan="2">SL N O</th><th rowspan="2">MON TH</th><th>FY -23-24</th><th>FY -24-25</th></tr><tr><th>%TRANSPOR TATION</th><th>%TRANSPORTAT ION</th></tr><tr><td>1</td><td>NOV</td><td>80.75</td><td>82.16</td></tr><tr><td>2</td><td>DEC</td><td>75.05</td><td>90.53</td></tr><tr><td>3</td><td>JAN</td><td>79.17</td><td>90.13</td></tr><tr><td>4</td><td>FEB</td><td>82.26</td><td>90.97</td></tr></table> <p>In the Month of Nov -2024 19 Nos ISUZU D Max Super strong additional Vehicles were sanctioned in addition to the already Existing 3MT Vehicles 27Nos and 122Nos 2Mt utility Vehicles.</p> <p>In the month of Dec-2024 ,19Nos ISUZU D Max Super strong vehicles were engaged by DE/Operations for transportation of failed DTRs, due to which % of DTR transportation by Departmental Vehicles is increased substantially.</p> <p>GPS tracking system is provided to all the utility vehicles in the month of March-25 for effective monitoring &utilization of Vehicles for transportation of failed DTRs.</p>	SL N O	MON TH	FY -23-24	FY -24-25	%TRANSPOR TATION	%TRANSPORTAT ION	1	NOV	80.75	82.16	2	DEC	75.05	90.53	3	JAN	79.17	90.13	4	FEB	82.26	90.97
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రిటైల్ సప్లయ వ్యాపారముకోసము 2025-26 ఆర్థిక సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు దరల ప్రతిపాదనలు & క్రాస్సబ్సిడీ సర్పార్టీ ప్రతిపాదనలు పై ఎస్.ఎస్.ఆర్. శాస్త్రి, సీనియర్ జర్నలిస్ట్, ప్లాట్ నెంబర్ 21/1, అజమాబాద్, ఆర్టీసీ కళ్యాణమండపం దగ్గర, బాగ్ లింగంపల్లి, హైదరాబాద్-500020, ఫోన్ నెంబర్ – 9490099086 గారి సూచనలు/సలహాలకు సమాధానాలు.

క్రమ సంఖ్య	అభ్యంతరాలు /సూచనలు	సమాధానాలు															
1.	టీజీఎస్పీడిసీఎల్, టీజీఎస్పీడిసీఎల్ సంస్థలు 2021-22, 2022-23, 2023-24, 2024-25 ఆర్థిక సంవత్సరాల్లో ప్రయివేటు విద్యుదుత్పత్తి సంస్థలు, పవర్ ఎక్స్‌జెంజు నుంచి స్వల్పకాలిక కొనుగోళ్ళ విధానం ద్వారా ఎన్ని మిలియన్ యూనిట్ల విద్యుత్ కొన్నారు? యూనిట్ విద్యుత్ కొనుగోలు గరిష్ట సగటుధర ఎంతో వెల్లడించాలని విజ్ఞప్తి.	<p>టీజీఎస్పీడిసీఎల్ సంస్థ 2021-22, 2022-23, 2023-24, 2024-25((జనవరి,2025 వరకు) ఆర్థిక సంవత్సరాల్లో స్వల్పకాలిక కొనుగోళ్ళ విధానం ద్వారా కొన్న విద్యుత్ మరియు సగటు ధర వివరాలు ఈ క్రింది పట్టికలో పొందుపర్చడమైనది.</p> <table border="1"> <thead> <tr> <th>ఆర్థిక సంవత్సరం</th><th>స్వల్పకాలిక విద్యుత్ కొనుగోళ్ళు (in MU)</th><th>స్వల్పకాలిక విద్యుత్ కొనుగోళ్ళ వ్యయం సగటు యూనిట్ ధర (Rs. per unit)</th></tr> </thead> <tbody> <tr> <td>2021-22</td><td>1997.91</td><td>4.55</td></tr> <tr> <td>2022-23</td><td>2769.60</td><td>6.53</td></tr> <tr> <td>2023-24</td><td>4712.78</td><td>5.35</td></tr> <tr> <td>2023-24(జనవరి,2025 వరకు)</td><td>4499.22</td><td>4.42</td></tr> </tbody> </table>	ఆర్థిక సంవత్సరం	స్వల్పకాలిక విద్యుత్ కొనుగోళ్ళు (in MU)	స్వల్పకాలిక విద్యుత్ కొనుగోళ్ళ వ్యయం సగటు యూనిట్ ధర (Rs. per unit)	2021-22	1997.91	4.55	2022-23	2769.60	6.53	2023-24	4712.78	5.35	2023-24(జనవరి,2025 వరకు)	4499.22	4.42
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2023-24	4712.78	5.35															
2023-24(జనవరి,2025 వరకు)	4499.22	4.42															
2.	2014 జూన్ నుంచి 2023 నవంబర్ వరకు విద్యుత్ కొనుగోళ్ళకు సంబంధించిన విధి విధానాల్లో (గైడ్ లైన్స్) ఏమైనా సవరణలు చేశారా? చేస్తే...వాటి వివరాలు	విద్యుత్ కొనుగోళ్ళకు సంబంధించి గౌరవనీయమైన కమిషన్ వారు జారీ చేసిన విధి విధానాలు మరియు CERC వారు జారీ చేసిన విధి విధానాలు ప్రకారం విద్యుత్															

	తెలుపగలరు.	కొనుగోళ్లు చేయడం జరుగుతుంది.
3.	రెండు డిస్కంల పరిధిలో ప్రస్తుత ఆర్థిక సంవత్సరం (2024-25) ఫిబ్రవరి నెలాఖరు నాటికి ప్రభుత్వ శాఖల విద్యుత్ బిల్లుల బకాయలు ఎంత ఉన్నాయి? శాఖల వారీగా వివరాలు తెలుపగలరు.	TGNPDCL: 1. Panchayat Raj & Rural Development : Rs.1020.60 Crs 2. Muncipal Administration (LT+HT) : Rs. 305.21 Crs. 3. HMWS & SB: Rs. 895.09 Crs. 4. Lift Irrigation Schemes : Rs. 7709.54 Crs. 5. Mission Bhageeratha (LT+HT) : Rs. 1666.54 Crs. 6. Other Govt Departments: Rs. 159.27 Crs Total Rs.11756.25 Crs.
4.	ప్రభుత్వ శాఖల బకాయలను రాబట్టేందుకు రెండు డిస్కంల సీయండ్లు తీసుకున్న నిర్ణయాలు ఏమిటి?	ప్రభుత్వ శాఖల బకాయలను వసూలు చేయడానికి అన్ని HODలతో క్రమం తప్పకుండా ఉత్తర ప్రత్యుత్తరాలు జరుగుతున్నాయి.
5.	ప్రస్తుత ఆర్థిక సంవత్సరం ఫిబ్రవరి నెలాఖరు నాటికి (2024-25) రాష్ట్ర ప్రభుత్వం విద్యుత్ సంస్థలకు ఏ తరహా ఆర్థిక సహకారాన్ని అందించింది? పథకాల వారీగా ఆ వివరాలు తెలుపగలరు.	ప్రస్తుత ఆర్థిక సంవత్సరం ఫిబ్రవరి నెలాఖరు నాటికి (2024-25) రాష్ట్ర ప్రభుత్వం TGNPDCL కి ఉదయ్ పథకంలో భాగంగా ఆర్థిక సంవత్సరం 2023-24 ఫైనాన్సియల్ లాస్ లో 50% అనగా రూ॥ 720 కోట్లు ఇవ్వడం జరిగినది.
6.	ప్రస్తుత ఆర్థిక సంవత్సరంలో ప్రభుత్వ హామీతో డిస్కంలు తీసుకున్న అప్పులు ఎన్ని? వాటిని దేనికోసం వినియోగించారు?	రూ॥ 3,738 కోట్లు, విద్యుత్ కొనుగోలు చెల్లింపులు మరియు ఇతర అవసరాలకై వినియోగించడమైనది.
7.	గృహజ్యోతి పథకం అమలు వల్ల డిస్కంలకు రావల్సిన బిల్లుల మొత్తాన్ని ప్రభుత్వం చెల్లిస్తున్నదా? ఏవైనా బకాయలు ఉన్నాయా?	గృహ జ్యోతి సబ్సిడీ మొత్తాన్ని రాష్ట్ర ప్రభుత్వం ఎప్పటికప్పుడు చెల్లిస్తున్నది.
8.	వ్యవసాయానికి ఉచిత విద్యుత్ పథకం కోసం డిస్కంలు సరఫరా చేస్తున్న కరెంటు ఎంత? ఆ వినియోగానికి సమానమైన మొత్తాన్ని ప్రభుత్వం రీయింబర్సుమెంట్	2024-25 ఆర్థిక సంవత్సరంలో (జనవరి,2025 వరకు) AGL వినియోగదారులకు

	చేస్తున్నదా?	6518 MU విద్యుత్ సరఫరా చేయబడింది. రాష్ట్ర ప్రభుత్వం 2024-25 ఆర్థిక సంవత్సరంలో గౌరవనీయమైన కమిషన్ వారు ఆమోదించిన ప్రకారం (ఫిబ్రవరి, 2025 వరకు) వ్యవసాయ ఉచిత విద్యుత్ సబ్సిడీ క్రింద రూ॥ 5,788కోట్లు చెల్లించడం జరిగినది.
9.	2024-25 ఆర్థిక సంవత్సరంలో ఫిబ్రవరి నాటికి టీజీఎస్పీడిసీఎల్, టీజీఎస్పీడిసీఎల్ సంస్థల్లో అవినీతి నిరోధకశాఖకు పట్టుబడిన ఉద్యోగులు ఎందరు? వారిపై ఎలాంటి క్రమశిక్షణా చర్యలు తీసుకున్నారు?	2024-25 ఆర్థిక సంవత్సరంలో ఫిబ్రవరి నాటికి టీజీఎస్పీడిసీఎల్ సంస్థలో అవినీతి నిరోధకశాఖకు పట్టుబడిన ఉద్యోగుల వివరాలను మరియు వారిపై తీసుకున్న క్రమశిక్షణా చర్యల వివరాలను దీనితో అనుబంధం-I గా జతపరచబడింది.
10.	2024-25 ఆర్థిక సంవత్సరానికి సంబంధించి టీజీఎస్పీడిసీఎల్, టీజీఎస్పీడిసీఎల్ సంస్థలు తమ వార్షిక ఆదాయ అవసరాల ప్రతిపాదనల్ని (ఎఆర్ఆర్) తెలంగాణ విద్యుత్ నియంత్రణ మండలి (టీజీఈఆర్సీ)కి ఎప్పుడు సమర్పించాయి? ఆలస్యంగా దాఖలు చేస్తే, ఎంత సొమ్మును జరిమానాగా చెల్లించారు?	2024 - 25 ఆర్థిక సంవత్సరానికి సంబంధించి TGNPDCL, తమ సమగ్ర ఆదాయ ఆవశ్యకత (ARR) ప్రతిపాదనలని తేది: 18-09-2024 నాడు గౌరవనీయమైన కమిషన్ వారికి సమర్పించడం జరిగినది మరియు ఆలస్యంగా దాఖలు చేసినందుకు రూ.21,60,000 - సొమ్మును జరిమానాగా చెల్లించడం జరిగినది.
11.	గత ఏడాది ఏఆర్ఆర్ పై బహిరంగ విచారణ సందర్భంగా సీయండి లు ఇచ్చిన హామీలు ఏ మేరకు అమలయ్యాయి? అంతర్గత సామర్థ్యాన్ని ఎంతవరకు పెంచుకోగలిగారు?	1) ఆ స 2024-25 లో కాలిపోయిన ట్రాన్స్ఫార్మర్ లను డిపార్ట్మెంట్ SPM Shed కు తీసుకురావడానికి మరియు ఆరోగ్య వంతమైన ట్రాన్స్ఫార్మర్ లను తీసుకెళ్లాడానికి అధనంగా 19 ISU2U D max super strong వాహనాలను ఏర్పాటు చేయడమైనది. ప్రస్తుతము మొత్తము వాహనాలు 3 MT వాహనాలు 27 Nos. 2 MT Utility Vehicle -122 మరియు 19 ISUZU D-Max Super strong వాహనాలు. దీనివలన కాలిపోయిన ట్రాన్స్ఫార్మర్ డిపార్ట్మెంట్ ద్వారా రవాణా శాతము February-2023 లో 82.26% నుండి February-2024 లో 90.97% కి పెరగడం జరిగినది.

		<p>2) ఆ స 2024-25 లో విద్యుత్ షాక్ లతో జరిగే మరణాలను తగ్గించడానికి ఈ క్రింది విధంగా చర్యలు తీసుకోవడమైనది.</p> <ul style="list-style-type: none"> • ప్రతి జిల్లాలో డివిజనల్ ఇంజనీర్ /Tech. ను Safety Officer గా Re-designation చేయడం జరిగినది. • ప్రతి రోజు ప్రతి సెక్షన్ లో Safety awareness గురించి field staff తో మీటింగులు నిర్వహించడం. • రైతుల దగ్గరికి వెళ్ళి వారికి Safety మీద awareness తీసుకువచ్చే ప్రోగ్రామ్ ను " పొలం బాట " అను పేరుతో తీసుకరావడం జరిగినది. • గత స కంటే 16% తక్కువగా విద్యుత్ ప్రమాదాలు తగ్గటం జరిగినవి. <ul style="list-style-type: none"> • వినియోగ దారులకు మెరుగైన సేవ మరియు శీఘ్రమైన సర్వీస్ కోసము 1912 ను విస్తృతంగా ప్రచారం చేయడమైనది మరియు ప్రతి ట్రాన్స్ఫార్మర్ మీద 1912 ని వ్రాయించడమైనది. • రైతులకు అనుకూలంగా మరియు పారదర్శకంగా ఉండడం కోసము NPDCL వ్యవసాయ కనెక్షన్ అంచనాను (Estimate) message రూపంలో మరియు స్కచ్ ను తెలుగు లో మెసేజ్ ద్వారా పంపడం జరుగుచున్నది.
12.	ఉదయ్ స్కీం ద్వారా డిస్కంలకు రావల్సిన పూర్తి నిధులు వచ్చాయా? ఆ సొమ్మును బుక్ అడ్జస్ట్ మెంట్ చేశారా లేక డిస్కంలకు నగదు బదిలీ చేశారా?	ఉదయ్ పథకం క్రింద డిస్కంలకు రావలసిన పూర్తి నిధులు వచ్చాయి మరియు ఆ సొమ్మును డిస్కంలకు నగదు బదిలీ చేసారు.

అనుబంధం-I

A) The information on ACB trap cases of employees of TGNPDCL during the FY 2024-25 (up to February, 2025) are furnished here under:

1. **Sri Daravath Sharath Kumar**, Asst. Engineer/Op/Aswaraopet:

Sri Daravath Sharath Kumar, AE/Op/Aswaraopet was trapped by the ACB officials on **16.05.2024** while demanding and accepting an amount of Rs.1,00,000/- as bribe from the complainant Sri Konakalla Adithya, S/o. Janardhan Rao, R/o. Ashoknagar, Jangareddygudem Town, Eluru district to do official favour i.e., for attending procedure for releasing of new electrical service to the consumer. A case has been registered by the DSP, ACB, Khammam Range, Khammam vide Cr.No.04/RCT-KMM/2024 U/s.7(a) of PC Act, 1988.

Sri D. Sharath Kumar, AE/Op/Aswaraopet was **placed under suspension w.e.f. 17.05.2024FN** vide Memo dt: 22.05.2024.

2. **Sri Maloth Hussain**, Divisional Engineer/Op/Ghanpur:

Sri Maloth Hussain, DE/Op/Ghanpur was trapped by the ACB officials on **31.08.2024** when he demanded and accepted the bribe amount of Rs.20,000/- from the complainant Sri Kumbam Raju R/o. Station Ghanpur (V&M) for showing official favour i.e., to get the line clearance (LC) pertaining to work of shifting the 33KV electricity line existing in complainant's land and to instruct the private contractor and AE to complete the work. A case has been registered by the DSP, ACB, Warangal Range, Warangal vide Cr.No.14/RCT-ACB-WRL/2024 U/s.7(a) of PC Act, 1988.

Sri M. Hussain, DE/Op/Ghanpur was **placed under suspension w.e.f. 31.08.2024AN** vide Memo dt: 03.09.2024.

3. **Sri Jinugu Nagaraju**, Line Inspector O/o. AE/Op/Palvoncha Town.I:

Sri Jinugu Nagaraju, Line Inspector was trapped by the ACB officials on **23.10.2024** while demanding and accepting an amount of Rs.26,000/- as bribe from the complainant Sri Guguloth Nagaraju, S/o. Late Kishan, R/o. Karakavagu village, Palvoncha mandal, Bhadradri Kothagudem to do official favour i.e., for not booking case for use of electricity illegally. A case has been registered by the DSP, ACB, Khammam Range, Khammam vide Cr.No.09/RCT-ACB-KMM/2024 U/s.7(a) of PC Act, 1988.

Sri J. Nagaraju, LI was **placed under suspension w.e.f. 24.10.2024FN** vide Memo dt: 28.10.2024.

The above employees are still under suspension and no disciplinary action is initiated against them as on date. The disciplinary action is being initiated in ACB cases as per the instructions received from Government from time to time.

B) Further it is to inform that the disciplinary action imposed against the following two employees during the FY 2024-25 who were trapped by the ACB officials in the past years;

1. Sri Regunta Swamy, Ex.ADE/Op/R/Adilabad :

Sri R. Swamy, Ex.ADE/Op/R/Adilabad was trapped by the ACB officials on 18.11.2010 for demanding and accepting an amount of Rs.15,000/- as bribe from Sri Gundala Kannamaiah, S/o. Venkati, R/o. Sirichelma (V), Echoda Mandal, Adilabad district for doing an official favour i.e., to forward the estimation to his superior officers for the sanction of transformer, poles and other materials for providing electrical connection to the farm sector pertaining to the mother of complainant and other farmers of Sirichelma (V), Echoda (M), Adilabad (D) under Thatthkal scheme. A case was registered by the DSP, ACB, Karimnagar Range, Karimnagar vide Cr.No.14/ACB/KNR/2010 U/s.7 & 13(1)(d) R/W 13(2) of PC Act, 1988.

The Hon'ble Special Judge for Trial of SPE & ACB cases, Karimnagar dt: 10.04.2024 pronounced judgement against Sri R. Swamy, ADE who was convicted on the above case subsequently he was **dismissed from service w.e.f. 10.04.2024** besides treating the period of suspension from 18.11.2010 to 09.08.2011 as 'as such' vide Memo dt: 22.06.2024

2. Sri M. Sadashiv, Ex.AAE/Op/Makloor:

Sri M. Sadashiv, Ex.AAE/Op/Makloor was trapped by the ACB officials on 24.07.2018 when he demanded and accepted an amount of Rs.3,000/- as bribe from Sri K. Srinivas Reddy S/o. K.V. Subba Reddy, Subash Nagar, Nizamabad on 24.07.2008 for doing official favour to erect new transformer and new connection at the agriculture fields and bore wells of the complainant and his relatives. A case was registered by the DSP, ACB, Nizamabad Range, Nizamabad vide Cr.No.16/ACB-NZB/2008, U/s.7 & 13(1)(d) r/w 13(2) of PC Act, 1988.

The Hon'ble Special Judge for Trial of SPE & ACB cases, Hyderabad dt: 13.08.2024 pronounced judgement against Sri M. Sadashiv, AAE who was convicted on the above case subsequently he was **dismissed from service w.e.f. 13.08.2024** besides treating the period of suspension from 24.07.2008 to 02.11.2010 as 'as such' vide Memo dt: 24.10.2024

Response to Power Foundation of India

Power Foundation of India, B-28, Qutab Institutional Area, New Delhi – 110 016; Email: dg@powerfoundation.org.in		
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>4. Section 64 of the Electricity Act 20023 (Act) mandates the procedure of Tariff Order wherein in sub-section (3) it has been inter-alia mentioned that the appropriate Commission, within 120 days from receipt of an application shall issue the Tariff Order after considering all suggestions and objections received from the public.</p> <p>5. The need for timely issuance of Tariff Orders and True-up Orders has been decided by Hon'ble APTEL in its judgement dtd. 11/11/2011 in OP No. 1 of 2011, as follows</p> <p><i>"57. This Tribunal has repeatedly held that regular and timely truing-up expenses must be done since:</i></p> <p><i>(a) No projection can be so accurate as to equal the real situation.</i></p> <p><i>(b) The burden/benefits of the past years must not be passed on to the consumers of the future.</i></p> <p>(c) Delays in timely determination of tariff and truing-up entails:</p> <p><i>(i) Imposing an underserved carrying cost burden to the consumers, as is also recognised by para 5.3 (h) (4) of National Tariff Policy.</i></p> <p><i>(ii) Cash flow problems for the licensees.</i></p> <p>....</p> <p>65. In view of the analysis and discussion made above, we deem it fit to issue the following directions to the State Commissions:</p> <p><i>(i) Every State Commission has to ensure that Annual Performance Review, true-up of past expenses and Annual Revenue Requirement and tariff determination is conducted year to year basis as per the time schedule specified in the Regulations.</i></p> <p><i>(ii) It should be the endeavour of every State Commission to ensure that the tariff for the financial year is decided before 1st April of the tariff year...</i></p> <p><i>(iii) In the event of delay in filing of the ARR, truing-up and Annual Performance Review, one month beyond the scheduled date of submission of the petition, the State Commission must initiate Suo-moto proceedings for tariff determination in accordance with Section 64 of the Act read with clause 8.1 (7) of the Tariff Policy.</i></p> <p>....</p> <p><i>(v) Truing up should be carried out regularly and preferably every year..."</i></p>	<p>Telangana DISCOMs are in the final stages of preparation for the filing of True-up petitions for Retail Supply Tariffs. The necessary data is being compiled in compliance with regulatory guidelines, and the petitions shall be filed shortly.</p> <p>TGDISCOMs acknowledge that Hon'ble APTEL has ruled that SERCs can initiate suo-motu proceedings in the absence of utility filings, it is important to highlight that even in such proceedings, the Hon'ble Commission would still require actual data from the DISCOMs to ensure an accurate and fair assessment.</p> <p>Given the technical and regulatory intricacies, it is preferable that DISCOMs file the True-up petitions themselves, ensuring completeness and accuracy in submissions. This approach helps in maintaining transparency, avoiding unnecessary regulatory delays, and enabling a more cost reflective tariff determination process.</p>

	<p>6. From above it is noted that Hon'ble APTEL has even decided that SERCs can also initiate Suo-moto proceedings and collect the data and information and give suitable directions and then determine the tariff even in the absence of the application filed by the utilities by exercising the powers under the provisions of the Act as well as the Tariff Regulations.</p> <p>7. Thus, Tariff determination ought to be treated as a time bound exercise. If there is any lack of diligence on the part of the Utilities which has led to the delay, SERCs must play a pro-active role in ensuring the compliance of the provisions of the Act and Regulations made thereunder. Timely issuance of Tariff and True-up Orders that is fair and cost reflective, allows utilities to maintain adequate cash flow, thus enabling them to supply uninterrupted quality supply to the consumers. It further avoid the burden of creating Regulatory Assets, Carrying Cost and Tariff shock at once to the end consumers. However, PFI notes that TG DISCOMs have not filed True-Up Petition of Retail Supply for FY 2023-24.</p>	
2	<p>8. Further, it is noted from Regulations 6.2 (f) of Telangana State Electricity Regulatory Commission (Multi Year Tariff) Regulation, 2023 that after first year of the Control Period (FY 2024-25 to FY 2028-29) and onwards, the annual petitions by distribution licensee (for retail supply business) shall comprise of True-up of preceding year. Relevant extract of the Regulations are as follows:</p> <p>"6 Procedure for filing Petition ... 6.2 The petitions to be filed for each Control Period under this Regulation are as under: ... f) After first year of the Control Period and onwards, the annual petitions by distribution licensee (for retail supply business) shall comprise of: i. True-up of preceding year; ii. Revised Aggregate Revenue Requirement for ensuing year of the Control Period; iii. Revenue from retail sale of electricity at existing tariffs & charges and projected revenue gap for ensuing year of the Control Period; iv. Proposal of consumer category wise retail supply tariff and charges for ensuing year of the Control Period."</p>	<p>Yes, TGDISCOMs acknowledge that as per regulations, the Revised aggregate Revenue Requirement for FY 2025-26, Revenue from retail sale of electricity at existing tariffs & charges and projected revenue Gap for FY 2025-26 of 5th control period and Proposal of consumer category wise retail supply tariff and charges for FY 2025-26 of 5th Control Period petition has been filed with the Hon'ble TGERC for approval and preceding year's true up petitions are required to be filed and the same will be filed before the Hon'ble Commission.</p>
3	<p>9. So, as per the Regulatory provisions TG DISCOMs should have timely filed the True-Up of Retail Supply for FY 2023-24 along with the ARR & Tariff Petition for FY 2025-26. However, PFI notes that TG</p>	<p>Telangana DISCOMs are in the final stages of preparation for the filing of True-up petitions for Retail Supply Tariffs.</p>

	DISCOMs have yet not filed True-Up Petition of Retail Supply for FY 2023-24 and have filed ARR & Tariff Petition for FY 2025-26 with 2 months delay (mentioned in section below). Such practice of TG DISCOMs increases the burden of Carrying Cost to the end consumers which translates to higher tariff.	The necessary data is being compiled in compliance with regulatory guidelines, and the petitions shall be filed shortly.
4	<p>10. In this regard, it is pertinent to highlight the Regulatory Provisions formulated by Hon'ble Uttar Pradesh Electricity Regulatory Commission (UPERC) wherein if the true-up petition is not submitted within the time lines given in the specific Regulations no carrying cost shall be allowed for the gap arrived for the true-up year. However, in case of surplus, the same with carrying cost shall be recovered. This avoids the burden of carrying cost, if any, on the end consumers and the same has to be borne by the DISCOMs. Relevant extract of the UPERC (Multi Year Tariff for Distribution and Transmission) (Second Amendment) Regulations, 2022, are as follows:</p> <p>"Regulation 6. True-UP 6.1 The Licensee shall file Petition for True-Up as provided in Regulation 4.1 of these Regulations: <i>Provided that the Petition shall include information in such form as may be stipulated by the Commission, together with the Accounting Statements, extracts of books of account and such other details, etc., as per the Guidelines and Formats as may be prescribed by the Commission; Provided further that if the true-up petition is not submitted within time lines given in the Regulation 4.1, no carrying cost shall be allowed for the gap arrived for the true-up year. However, in case of surplus, the same with carrying cost shall be recovered."</i></p> <p>11. Power of Foundation (PFI) therefore, urges Hon'ble TGERC to either conduct True-Up of FY 2023-24 on suo-motu basis as mandated by Hon'ble APTEL along with the ARR of FY 2025-26 or disallow the carrying cost, if any, at the time of True-Up. This will avoid the burden of creating Regulatory Assets, Carrying Cost and Tariff Shock to the end consumers.</p>	<p>TGDISCOMs would like to clarify that they are in the final stages of preparing the True-up petitions, and they will be filed soon. The compilation and verification of data are crucial to ensuring an accurate and sound submission.</p> <p>Provisions referred to UPERC are specific to Uttar Pradesh and have no legal implications in the context of Telangana Discoms. Further given the premise of the current MYT Regulation 2 of 2023, no such clause is applicable to TGDISCOMs. Any decision on carrying cost or disallowances will be guided by the said regulatory framework applicable to Telangana and not by references from other states.</p> <p>With reference to Suo-moto proceedings by the Hon'ble Commission, even if the Hon'ble Commission were to initiate Suo-moto proceedings in the absence of a True-up petition, it would still rely on the actual financial and operational data provided by DISCOMs to arrive at any determination of subsequent pass through. This further reinforces the need for DISCOMs to file the petition themselves, ensuring that all relevant facts and figures are presented accurately.</p> <p>The issue of carrying cost is not an automatic disallowance. Carrying costs should be allowed where there is a genuine delay due to regulatory proceedings or other uncontrollable factors. Any assessment of carrying costs will be made by Hon'ble Commission based on the facts and circumstances</p>

		of the case.
		Telangana DISCOMs are committed to filing the True-up petitions in accordance with the applicable regulations. The process is already underway, and the petitions will be filed soon, ensuring that all required details are furnished for the Commission's due consideration.
5	<p>12. TG DISCOMs filed petition before Hon'ble TGERC for their Retail Supply business for approval of revised ARR and Tariff for FY 2025-26 on 28/01/2025, however, as per Telangana State Electricity Regulatory Commission (Multi Year Tariff) Regulation, 2023, the said Petitions are to be filed by 30/11/2024. So, there's a delay of around 2 months in submission of the Retail Supply Tariff Petitions.</p> <p>13. It is pertinent to note that TG DISCOMs have made it a regular affair to not file the Petitions as per the specified timelines by Hon'ble TGERC. TG DISCOMs also failed to file Retail Supply Tariffs petition for FY 2024-25 on time as a consequence of which Hon'ble TGERC imposed penalties on them and deducted their Return on Equity (RoE). Further, Hon'ble TGERC in Tariff Order dtd. 28/10/2024 for Retail Supply Business for FY 2024-25 strictly directed TG DISCOMs to adhere to the timelines as specified in TGERC MYT Regulations 2023 in future filing of petitions. Relevant extract of Tariff Order for FY 2024-25 is as follows:</p> <p><i>"1.2.3 The Commission observe that despite multiple extensions accorded for filing the ARR and Retail Supply Tariffs petition for Retail Supply Business (initially extended from 30.11.2023 to 02.01.2024, and later to 31.01.2024 by notifying Regulation No.2 of 2023), TGDISCOMs have failed to file the petitions in time. Further, TGDISCOMs, though they were aware that they could file ARR and Retail Supply Tariffs petition for Retail Supply Business petition in a sealed cover during enforcement of Model Code of Conduct, they failed to do so. As such, to enforce discipline, the Commission decided to impose penalties as per Fee Regulation No.2 of 2016 read with subsequent amendments thereof and Regulation No.2 of 2023. The Commission has dealt with regard to reduction in rate of RoE in terms of Regulation No.2 of 2023 in Chapter-4. The Commission directs the petitioner to adhere to the timelines as specified in Regulation No.2 of 2023 in future filing of petitions."</i></p> <p>14. Regulations 4(3)(c) TGERC First Amendment to 'Fee' Regulation, 2022 stipulates that</p>	<p>The Licensee has filed a delay of condonation petition along with the ARR Filing duly laying out the reasons for delay in filing of said petition. The same has been reproduced below:</p> <p>a. As per the instructions of Govt. of Telangana, the TGDISCOMs were in the process of preparation and finalization of State Energy Policy for next 10 years.</p> <p>b. In coordination with TGREDCO, the TGDISCOMs have floated tenders for empanelment of vendors for supply and erection of Solar Power Plants up to 1 MW for self-help group (SHG) under "Indira Mahila Shakti Program" of the Govt. of Telangana.</p> <p>c. The TGDISCOMs were in the process of floating of tenders with RFP for supply and erection of Solar Power Plants upto 4000 MW under 'Kusum Component – C.'</p> <p>d. The information on the status of upcoming new LIS projects in the state of Telangana and their energy requirement for FY 2025-26 from I&CAD is awaited.</p> <p>e. The revised scheduled CODs of YTPS and NCEs are awaited.</p> <p>f. Finalisation of process for construction of new Power Plant at Ramagundam.</p> <p>g. Further, the Licensee had submitted the ARR for 5th Control Period under MYT regime from FY 2024-25 to FY 2028-29 in September 2024 and the Hon'ble Commission had released the Tariff Order on 28.10.2024.</p> <p>h. The Licensee had undertaken analysis of the tariff order released by the Hon'ble Commission and further was also developing certain proposals for the subject petition.</p>

	<p><i>"The penal fee that is attracted in case of licensee or generating company not complying with the provisions of other regulations on the specific topics mentioned in the table below shall be required to pay the penal fee as shown in the opposite column on each of the petition separately whenever it is filed"</i></p> <table><tr><td>1. Aggregate Revenue Requirement & Tariff/ Multi Year Tariff petition.</td><td><p>Rs.5,000/- per day for the first 30 days beyond the specified date. After 30 days, Rs.1,50,000/- plus Rs.10,000/- per day till submission of petition</p></td></tr></table> <p>15. Further, Regulations 29.2 of TGERC Multi Year Tariff Regulations 2023 stipulates that:</p> <p><i>"Provided that in case of delay in submission of tariff/true-up filings by the generating entity or licensee or SLDC, as required under this Regulation, rate of RoE shall be reduced by 0.5% per month or part thereof."</i></p> <p>16. PFI thus requests Hon'ble TGERC to impose penalties on TG DISCOMs as per the Regulatory provisions which works out around Rs. 6 lakhs (5,000*30 + 10,000*29 + 1,50,000) for each DISCOM and also reduce the RoE (at the rate of 0.5% per month) as claimed by TG DISCOMs for FY 2025-26.</p>	1. Aggregate Revenue Requirement & Tariff/ Multi Year Tariff petition.	<p>Rs.5,000/- per day for the first 30 days beyond the specified date. After 30 days, Rs.1,50,000/- plus Rs.10,000/- per day till submission of petition</p>	<p>In light of the above reasons, the Licensee humbly requests the Hon'ble Commission to consider above mentioned reasons and condone the delay for filing of the petition. Further, the Licensee humbly requests the Hon'ble Commission not to impose any financial penalties on the DISCOM in view of the delay. Further the DISCOMs would assure the Hon'ble THERC to file the future petitions within the time according to the Hon'ble regulations time to time.</p>
1. Aggregate Revenue Requirement & Tariff/ Multi Year Tariff petition.	<p>Rs.5,000/- per day for the first 30 days beyond the specified date. After 30 days, Rs.1,50,000/- plus Rs.10,000/- per day till submission of petition</p>			
6	<p>17. TG DISCOMs in their ARR Petitions for FY 2025-26 have claimed huge unmetered sales, 40% of the total Sales in case of TG North DISCOM and 26% of the total Sales in case of TG South DISCOM. These unmetered Sales are pertaining to the Agricultural consumers. The unmetered Agriculture Sales as claimed for FY 2025-26 have been estimated to increase by around 5% over the Agriculture Sales in FY 2024-25 for Telangana State. Further, TG DISCOMs have also considered increase in number of unmetered agricultural connections in FY 2025-26 as shown below:</p>	<p>Currently accounting for unmetered connections is being done through ISI methodology in which the some of the AGL DTRs as sample DTRs have meters at LT side for recording the consumption of Agriculture and then calculated the unmetered sales(Agriculture consumers).</p> <p>The Discoms have proposed to take up the segregation of agriculture feeders under RDSS for better monitoring and accounting of agriculture consumption.</p> <p>The Licensee has addressed letters to the MoP, GoI for approval on the proposals of the Licensee under RDSS. The above mentioned works will be taken up after approval from Government of India.</p>		

Table 1 Billing Determinants for TG DISCOMs for FY 2024-25 & FY 2025-26

Particulars	FY 2024-25	FY 2025-26	y-o-y Increase	Increase (%)	Ref
TGSPDCL					
Connections (nos)	1434508	1510736	76228	5%	Form-2
Contracted Demand (MW)	5317	5601	284	5%	Form-3
Sales (MU)	16400	17124	723.99	4%	Form-4
TGNPDCL					
Connections (nos)	1363883	1409365	45482	3%	Form-2
Contracted Demand (MW)	5162	5332	170	3%	Form-3
Sales (MU)	9812	10457	645	7%	Form-4

18. PFI notes from the above table that TG DISCOMs have proposed addition in new unmetered connections in FY 2025-26 as well, which implies that TG DISCOMs themselves are proposing to provide new connections which will be unmetered in FY 2025-26. However, this is in violation of the MoP Electricity (Rights of Consumers) Rules, 2020 dtd. 31/12/2020, which states that no connection shall be given without a meter and such meter shall be the smart prepayment meter or pre-payment meter. Relevant extract of the said Rules is as follows:

***"5. Metering – (1)** No connection shall be given without a meter and such meter shall be the smart prepayment meter or pre-payment meter. Any exception to the smart meter or prepayment meter shall have to be duly approved by the Commission. The Commission, while doing so, shall record proper justification for allowing the deviation from installation of the smart pre-payment meter or prepayment meter."*

19. PFI further observed that as per CEA Report on "Status of Metering in the Country", only 18% of the Rural Distribution Transformer (DT) in case of TG South DISCOM and 30% of the Rural DT in case of TG North DISCOM are metered as on 31/03/2024. In the past, Hon'ble TGERC in its Tariff Orders has repeatedly directed TG DISCOMs to achieve 100% of the Agricultural DTR Metering, however, TG DISCOMs have failed to meter all Agricultural DTs as evident from the CEA Report.

20. PFI submits that unmetered connections and accounting of Sales on assessment basis led to improper Energy Accounting resulting in Revenue loss and scheduling of Costly Power which increases the Revenue Gap during True-up that is socialized to consumers at large

	<p>in the ARR by Hon'ble Commission even though Tariff is fixed at Normative Distribution Loss Level. Distribution Losses, Metering, Billing and Collection are controllable parameters on the part of DISCOMs and therefore, True-up should not be allowed for masked inefficiencies on account of DISCOMs. Due to lack of metered connections and huge unmetered Sales, Proper Energy Accounting and Actual Distribution losses cannot be ascertained. Thus, the inefficiencies of TG DISCOMs are borne by honest metered consumers.</p> <p>21. Further, some of the key parameters highlighting the negative performance of TG DISCOMs are as follows:</p> <p>a) Both TG DISCOMs – TGSPDCL and TGNPDCL are loss-making utilities and have been rated at 'C-' as per 13th Integrated Rating for FY 2023-24. Their performance has been downgraded with respect to last years' assessment for FY 2022-23.</p> <p>b) AT&C Loss is far above national average of 16.3% i.e., 20% for TGNPDCL and 18.80% for TGSPDCL in FY 2023-24.</p> <p>c) ACS-ARR Gap (on Cash basis) is far above national average of 0.39 Rs./kWh i.e., Rs. 1.35 /kWh for TGNPDCL and Rs. 1.55/kWh for TGSPDCL in FY 2023-24.</p> <p>22. In view of the above, PFI submits in case of such huge unmetered Sales, Distribution Losses of TG DISCOMs cannot be ascertained accurately, and proper Energy Accounting cannot be done. Thus, PFI requests Hon'ble TGERC to take stern measures in terms of the provisions stipulated under Section 142 of the Electricity Act, 2003 for non-compliance of Directions by TG DISCOMs. Separate non-compliance proceedings may be initiated against TG DISCOMs. DISCOMs may be directed to submit Action Taken Report (ATR) to the Hon'ble Commission, with a copy to REC and MoP, stipulating the timelines for metering at least 100% Agricultural Distribution Transformers. This proceeding is despite the fact that TG South has achieved the Distribution Loss target in FY 2023-24 (as mentioned in this Petition at para 3.2.1) which could have been even better had metering been in place and benefit of proper Energy Accounting should have been passed on to consumers through optimized Tariff.</p>	
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7	<p>23. It is pertinent to note PFI vide its Comments for TG DISCOMs Distribution ARR Petition for FY 2024-25 submitted before Hon'ble TGERC that TG DISCOMs are not availing Revamped Distribution Sector Scheme (RDSS) – A flagship scheme of Ministry of Power, Govt. of India. Telangana State has not participated in RDSS and only Particularly Vulnerable Tribal Groups (PVTG) Households electrification works have been sanctioned under RDSS.</p> <p>24. MoP (GoI) launched the RDSS on 29/07/2021, with an objective to reduce the AT&C losses to 12-15% (PAN India) and ACS-ARR gap to Zero. The scheme consists of two components – Metering and Distribution Infrastructure Works.</p> <p>25. PFI submitted before Hon'ble Commission and even highlighted in the Public hearing held on 17/02/2025 that TG DISCOMs should participate in RDSS, attempt to increase metering levels which will help in better Energy Accounting and Reduction in Loss levels and should also help in reducing the Retail Tariff of the end consumers through reduction in Capex.</p> <p>26. TG DISCOMs in this Petition for ARR & Tariff for Retail Supply Business for FY 2025- 26 has submitted before Hon'ble TGERC that draft DPR for Smart Prepaid Metering for all existing Consumers (excluding Agriculture Consumers) and System Metering under RDSS has been prepared which is to be approved by Distribution Reforms Committee (ORC) and also by the Telangana State Cabinet in order to obtain final approval by MoP, GoI. The same has been informed to Hon'ble Commission vide Lr.No. CE (RAC)/ SE(RAC)/ DE(RAC) /F.C32/ D.No.644/24, dtd. 12/12/2024.</p> <p>27. So, understanding the importance of implementation of RDSS in Telangana State, TG DISCOMs have now initiated to participate in the RDSS. However, TG DISCOMs may be directed to expedite the approval process for ROSS.</p> <p>28. Till the non-compliance Proceedings gets completed to the satisfaction of the Hon'ble TGERC, PFI requests Hon'ble Commission to not allow any unmetered Agriculture Sales for FY 2025-26 as the same is in violation of repeated directions by the Hon'ble TGERC. TG DISCOMs have been given ample time and support to improve their</p>	<p>The Licensee is continuously pursuing with the Government of Telangana for clearance of outstanding electricity dues which is key eligibility criteria for participating in the RDSS scheme.</p> <p>Further, the Licensee has also addressed letters to the MoP, GoI to approve the proposal of the Licensee under RDSS. After approval from Government of India, the Licensee will participate in RDSS Scheme.</p> <p>Further the detailed information on arriving of actual Agriculture sales for FY 2023-24 and projected agriculture sales for FY 2025-26 have been submitted the the Hon"ble commission as additional information of RSB and uploaded in website of TGNPDCL.</p> <p>The Licensee requests the Hon'ble Commission to review the Licensee's petition and approve the same post prudence check.</p>
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	operational efficiency, however DISCOMs have failed to do so. If such unmetered Sales are to be allowed in view of giving some time to the DISCOMs to convert all existing unmetered connections into metered, it should not be more than 50% of the proposed unmetered Sales.	
8	TG DISCOMs have proposed 27,581 MU of unmetered Sales in Agriculture category. So, the Hon'ble Commission may provisionally disallow 13,790 MU of the Sales, i.e., 50% of the unmetered Energy Sales and in turn its corresponding Power Purchase Cost of Rs. 7,378 Cr. The inefficiencies of TG DISCOMs should not be allowed to pass through to the end consumers and Govt. of Telangana should bear the same in the form of subsidy. The detailed submission for disallowance of Rs. 7,378 Cr. of Power Purchase Cost on account of unmetered Sales of 13,790 MU which is violation of repeated directions of Hon'ble TGERC and MoP Rules is given in the subsequent Section. However, the corresponding revenue from such Agricultural Sales should be allowed as claimed by TG DISCOMs.	TGNPDCL projected 10,457 MU of sales in LT V category based on the ISI Methodology and pending agricultural connection requests indicating need for supply of electricity. The Discoms have proposed to take up the segregation of agriculture feeders under RDSS for better monitoring and accounting of agriculture consumption. Power purchase costs incurred to ensure the provision of the supply of electricity to LT V category should be duly considered.
9	It is proposed that TG DISCOMs may be directed to submit action plan for metering 100% Agricultural Distribution Transformers at first level. The approval of such action plan by Hon'ble TGERC should be 100% metering of Agricultural Distribution Transformers within the target date of maximum two years. Equivalent Power Purchase Cost without Carrying Cost may be allowed during True-up of FY 2025-26 only when 100% Agricultural Distribution Transformers are metered.	<p>TGDISCOMs would like to submit before the Hon'ble Commission that they categorically reject the proposal as it is not reasonable, lacks regulatory backing, and is not aligned with the prevailing regulatory framework. The existing regulatory framework does not impose such a requirement, and any proposal to link power purchase cost approval to this condition is arbitrary and unjustified.</p> <p>Achieving 100% metering of Agricultural DTs within a short period is technically and financially impractical due to ground-level challenges such as infrastructure constraints, resistance from stakeholders, and funding limitations. Large-scale metering of Agricultural DTs requires substantial investment, which is subject to policy decisions and financial feasibility.</p> <p>Disallowing carrying cost based on an unilateral and non-statutory condition is against regulatory jurisprudence. As per established regulatory norms, power purchase cost is a</p>

		<p>legitimate expenditure incurred by DISCOMs, and any delay in recovery due to regulatory processes must be compensated through carrying cost. Denying carrying cost on legitimate claims violates the principle of time value of money.</p> <p>The Hon'ble TGERC determines power purchase cost recovery based on prudence check, past trends, and actual expenditure. Introducing additional conditions beyond the existing MYT Regulations and Tariff Policy is not within the scope of the present regulatory framework.</p> <p>In light of the above, the proposal to mandate 100% metering of Agricultural Distribution Transformers as a precondition for cost recovery is unreasonable and lacks regulatory legitimacy. Telangana DISCOMs will continue to comply with existing regulatory directives in this matter. We request before the Hon'ble Commission that this matter be considered in alignment with the applicable regulations and practical realities.</p>
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31. PFI notes that TG DISCOMs while computing variable Cost of TG GENCOs have considered 3% escalation on the approved Variable Cost for FY 2025-26 approved by Hon'ble TGERC in the MYT Order dtd. 28/10/2024 for the Control Period which is just 3 months prior to this instant Tariff Petition filed. Similarly, TG DISCOMs while computing the Fixed and variable Cost of Central Generating Stations (CGS) have considered 3% escalation on the approved Fixed and variable Cost for FY 2025-26. For other Generating Stations TG DISCOMs have considered same cost as approved by Hon'ble TGERC for FY 2025-26. However, no reasoning has been provided by TG DISCOMs for arbitrarily considering such escalations only. for some specific Generating Stations.

32. PFI requests Hon'ble TGERC to consider the same Power Purchase Cost (Fixed and Variable) for TG GENCOs and CSGSs as approved in MYT Order dtd. 28/10/2024 for FY 2025-26. Any difference in Actual and Allowed Power Purchase Cost will be automatically factored in Fuel and Power Purchase Adjustment Surcharge (FPPAS) mechanism for FY 2025-26. It will not be prudent to escalate the ARR of FY 2025-26 and allow upfront loading in Tariff, due to increased Power Purchase Cost, for the consumers of Telangana.

33. The revised Power Purchase Cost of TG GENCOs and CSGSs considering the above submission by PFI is tabulated below:

Table 2 Power Purchase Cost for TG DISCOMs from TG GENCO (Thermal) & CGS

Stations	Claimed (Rs. Cr.)			PFI Working (Rs. Cr.)			
	Fixed Cost	Variable Cost	Total Cost	Fixed Cost	Variable Cost	Total Cost	PFI proposed Disallowances
TGSPDCL							
TGGENCO - Thermal	8,130	11,762	19,892	8,130	11,419	19,549	(343)
CGS	2,655	5,568	8,223	2,578	5,406	7,983	(240)
TGNPDCL							
TGGENCO - Thermal	3,394	4,910	8,304	3,394	4,767	8,161	(143)
CGS	1,108	2,324	3,432	1,076	2,256	3,332	(100)

TG DISCOMs have considered a nominal 3% escalation on the variable cost of TGGENCO to account for higher variable cost which is invariably observed in the actual variable cost payments. Further, the Licensee has also considered a nominal 3% escalation on the approved fixed and variable costs of CGS stations approved by the Hon'ble Commission since only a single fixed and variable cost had been approved by the Commission in the 5th MYT Tariff Order dated 28.10.2024 for all financial Years i.e. FY 2024-25 to FY 2028-29 and to account for the increase in costs which will occur in FY 2025-26.

The Licensee notes the point raised by the Objector regarding the Fuel and Power Purchase Adjustment Surcharge Mechanism however the Licensee submits that such a mechanism will increase the burden on the Licensee. Further, considering that the Licensee has not proposed any tariff hikes for FY 2025-26, a case of upfront loading does not arise.

The Licensee requests the Hon'ble Commission to review the Licensee's petition and approve the same post prudence check.

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34. PFI has observed that TG DISCOMs have considered Power Procurement from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. in FY 2025-26, however, Hon'ble TGERC in MYT Order <lttd. 28/10/2024 has not considered the Power Procurement from these Stations for FY 2025-26 in view of legacy issues. Relevant extract of the Commission's Order is as follows:

"4.3.16 ... The Commission has not considered the capacity allocation from NTECL Vallur TPS and NLC Tamil Nadu Power Ltd. in line with the earlier directions of the Commission in RST Orders for FY 2017-18, FY 2018-19, FY 2022-23 and FY 2023-24."

35. In view of above, PFI requests Hon'ble TGERC to not consider the Power Purchase from these Stations and disallow the Power Purchase Cost as claimed by TG DISCOMs for these two Stations, as tabulated below:

Table 3 Power Purchase Cost for TG DISCOMs from Vallur TPP (NTECL) & NLC

Generating Stations	Claimed					PFI WORKING Total Cost (Rs. Cr.)
	Quantum (MU)	Fixed Cost (Rs. Cr.)	VC/kWh	VC (Rs. Cr.)	Total Cost (Rs. Cr.)	
TGSPDCL						
Vallur TPP (NTECL)	542	58	4.08	221	279	0.00
NLC Tamil Nadu Power Ltd.	759	86	4.24	322	408	0.00
TGNPDCL						
Vallur TPP (NTECL)	226	24	4.08	92	116	0.00
NLC Tamil Nadu Power Ltd.	317	36	4.24	134	170	0.00

With regards to NTECL Vallur and NLC Tamil Nadu Power Limited, the Licensees had submitted a requisition to MoP expressing its willingness to surrender the share of Telangana from NTECL Vallur and NLC Tamil Nadu Power Limited. However, MoP continues to schedule energy to Telangana from the above mentioned plants and therefore, availability and power procurement from the same has been considered.

The Licensee requests the Hon'ble Commission to review the Licensee's petition and approve the same post prudence check.

12	<p>36. In above Section, PFI requested Hon'ble TGERC to not provisionally allow 50% of claimed unmetered Agriculture Sales for FY 2025-26 as the same is in violation of repeated directions of Hon'ble Commission. TG DISCOMs have been given ample time and support to improve their operational efficiency, however DISCOMs have failed to do so. If at all such unmetered Sales are to be allowed in view of giving some time to the DISCOMs to convert all existing unmetered connections into metered, it should not be more than 50% of the proposed unmetered Sales.</p> <p>37. TG DISCOMs have proposed 27,581 MU of unmetered Sales in Agriculture category. So, the Hon'ble Commission may provisionally disallow 13,790 MU of the Sales, i.e., 50% of the unmetered Energy Sales and in turn its corresponding Power Purchase Cost which has been worked out by PFI as Rs 7,378 Cr considering the approved Average Power Purchase Cost of Rs. 5.35/kWh for FY 2025-26 in MYT Order dtd. 28/10/2024. So, the corresponding Power Purchase Cost to be provisionally disallowed in view of unmetered Sales in Agriculture category is Rs 7,378 Cr. for TG DISCOMs for FY 2025-26. Equivalent Power Purchase Cost without Carrying Cost to be allowed during True-up of FY 2025-26 only when 100% Agricultural Distribution Transformers are metered.</p>	<p>TGNPDCL projected 10,457 MU of sales in LT V category based on the ISI Methodology and pending agricultural connection requests indicating need for supply of electricity. Additionally, feeders connected to these agricultural connections at substation level are being monitored. Power purchase costs incurred to ensure the provision of the supply of electricity to LT V category should be duly considered.</p>
13	<p>38. TG DISCOMs in their ARR Petitions for Distribution Business for FY 20 25 - 26 submitted net Distribution ARR (comprising of O&M expenses, Depreciation, Interest and finance charges on Loan and Return on Equity) of Rs. 5,414, Cr. for TGSPDCL and Rs. 3,928 Cr. for TGNPDCL (RoE).</p> <p>39. However, based on the applicable Regulatory provisions PFI has worked out net Distribution ARR of Rs. 4,520 Cr. and Rs. 3,298 Cr. for TGSPDCL and TGNPDCL respectively. The detailed submission of PFI has been made in its letter dtd. 31/01/2025 sent to Hon'ble Commission in this regard. The Summary of claimed and PFI working of net Distribution Cost for FY 2025-26 is as follows:</p>	<p>Telangana DISCOMs respectfully submit before the Hon'ble Commission that they have calculated the ARR strictly in accordance with the applicable regulations and methodologies prescribed by the Hon'ble Commission.</p> <p>Licensees would like to further reiterate that ARR petition filing is a very complex and rigorous process that involves preparation of detailed financial models that incorporate all relevant cost elements that are unique to respective Discoms.</p> <p>Hence it is essential that that accurate and verifiable data sources be used for making projections in line with regulatory provisions.</p>

Table 4: Summary of Distribution Cost for FY 2025-26 for TG DISCOMS (Rs. Cr.)

Particulars	TGNDPCL			TGSPDCL			PFI Disallowances
	Claimed	PFI	Diff.	Claimed	PFI	Diff.	
Operation and Maintenance expenses	3003	2516	(488)	3822	3432	(390)	(878)
Depreciation	414	399	(15)	831	725	(106)	(121)
Interest and finance charges on Loan	383	292	(91)	453	453	0	(91)
Interest on Working Capital	98	98	0	128	128	0	0
Return on Equity	209	144	(65)	307	258	(49)	(113)
Total Expenditure	4,106	3,449	(659)	5,541	4,996	(545)	(1,203)
Less:							0
Income from Open Access (Wheeling Charges)	3.19	3.19	0	1.19	1.19	0	0
Non- Tariff Income	175	175	0	125	475	(350)	(350)
Distribution Cost	3,928	3,271	(659)	5,414	4,520	(895)	(1,553)

40. PFI requests Hon'ble TGERC to consider the submission made by PFI and accordingly allow net Distribution ARR while computing the ARR of Retail supply considering the PFI working shown above.

41. Based on the detailed submission made vide letter dtd. 31/01/2025 to Hon'ble Commission with respect to Distribution ARR Business wherein PFI has worked out revised O&M expenses, Depreciation, Finance Charges and RoE applicable for TG DISCOMS for FY 2025-26, the revised applicable expenses for Retail Supply Business, i.e., 10% of the Total ARR of TG DISCOMS, is as follows:

Table 5: Summary of Retail Supply expenses for FY 2025-26 for TG DISCOMS (Rs. Cr.)

Particulars (for Retail Supply, 10% of total)	TGNDPCL			TGSPDCL			PFI Disallowances
	Claimed	PFI	Diff.	Claimed	PFI	Diff.	
Operation and Maintenance expenses	334	280	(54)	425	381	(43)	(97)
Depreciation	46	44	(2)	92	81	(12)	(13)
Interest and finance charges on Loan	43	32	(10)	50	50	0	(10)
Return on Equity	23	16	(7)	34	29	(5)	(13)
Total Expenditure	445	372	(73)	601	541	(61)	(134)

42. PFI requests Hon'ble TGERC to consider the above expenses pertaining to Retail Supply Business as worked out by PFI above while computing the ARR of TG DISCOMS for FY 2025-26.

Third-party estimates or assumptions do not have access to this detailed and accurate data and therefore cannot be considered as a substitute for the ARR submitted by the DISCOMS.

Therefore consideration of externally calculated ARR figures, as such assessments based on assumptions, approximations, and incomplete data, which do not reflect the actual financial and operational realities of DISCOMS might result in undue financial burden to DISCOMS going further.

In light of the above, we humbly pray before the Hon'ble Commission that only the ARR submissions made by the DISCOMS, which are prepared as per regulations, backed by detailed justifications, and subject to regulatory scrutiny, be considered for tariff determination.

Further TGDISCOMS have always remained committed to providing any additional clarifications or supporting data as required by the Hon'ble Commission which would not be possible if computations and data of external third party is relied on.

Hence, TGDISCOMS pray that only submission made by the licensees be considered for prudence check.

14

43. TGSPDCL while computing the Cross Subsidy Surcharge for FY 2025-26 has considered Open Access Sales of 237 MU and Revenue from such Open Access Sales as Rs. 37 Cr., without submitting any reason/ basis for estimating such Open Access Sales. Further, PFI notes that Hon'ble TGERC while computing Revenue from Open Access Sales for FY 2024-25 considered Open Access Sales of 407 MU, based on the submission by TGSPDCL.

44. PFI submits that no basis has been provided by TGSPDCL for considering only 58% of the Open Access Sales in FY 2025-26 as compared to that in FY 2024-25 approved by TGERC. Such reduction in Open Access Sales should be backed by strong basis and reasoning which has not been submitted by TG DISCOMs. PFI thus requests Hon'ble TGERC to consider the same level of Open Access Sales in FY 2025-26 for TGSPDCL as that approved for FY 2024-25 and thus consider Revenue from Cross Subsidy Surcharge as Rs. 66.31 Cr. as approved for FY 2024-25. The said calculation is without the fact that increase in Open Access Sales will decrease the Power Purchase Cost of DISCOM and also decrease the Revenue which may be factored suitably in the Tariff model by Hon'ble Commission.

45. Based on above, the Summary of Disallowances worked out by PFI for TG DISCOMs is as follows :

Table 6: Summary of ARR and Revenue Gap for FY 2025-26 for TG DISCOMS (Rs. Cr.)

Sr. No.	Particulars	TGNPDCL			TGSPDCL			PFI TOTAL Disallow.
		Claimed	PFI	Diff.	Claimed	PFI	Diff.	
1	Power Purchase Cost	14,042	10,715	(3,327)	36,530	30,680	(5,850)	(9,177)
1a	Disallowance for higher cost of TG GENCO (Thermal) & CGS	-	(243)	(243)	-	(582)	(582)	(825)
1b	Disallowance of Power from NTECL Vallur TPS & NLC	-	(287)	(287)	-	(687)	(687)	(974)
1c	Disallowance for Unmetered Sales	-	(2,797)	(2,797)	-	(4,581)	(4,581)	(7,378)
2	Distribution Cost	3,928	3,298	(630)	5,414	4,520	(894)	(1,524)
3	O&M- Retail Supply	334	280	(54)	425	381	(43)	(97)
4	Depreciation- Retail Supply	46	44	(2)	92	81	(12)	(13)
5	Finance Charges- Retail Supply	43	32	(10)	50	50	0	(10)
6	RoE- Retail Supply	23	16	(7)	34	29	(5)	(13)
7	Other Costs	1,399	1,399	0	3,490	3,490	0	0
8	ARR for FY 2025-26	19,814	15,784	(4,030)	46,035	39,231	(6,804)	(10,834)
9	Revenue from Tariff	9,421	9,421	0	36,220	36,220	0	0
10	Revenue from CSS & AS	0	0	0	57	86	29	29
11	Revenue (Gap)/Surplus	(10,393)	(6,363)		(9,578)	(2,925)	Revenue Gap Reduces to Rs. 9,288 Cr.	

This issue is not pertains to TGNPDCL because the TGNPDCL has not shown any revenue from Open access sales in the filings.

	Hon'ble TGERC is requested to kindly consider the submissions as tabulated above. Accordingly, the Revenue Gap of Rs. 20,151 Cr. claimed by TG DISCOMs reduces to Rs. 9,288 Cr. as per PFI working.	
15	<p>47. PFI has observed that TG DISCOMs have not submitted any details for Compliance of the following Directives issued by Hon'ble TGERC:</p> <p><i>a) The Commission directs TGDISCOMs to conduct consumer awareness programs in areas with high AT&C losses.</i></p> <p><i>b) The TGDISCOMs are directed to conduct awareness programs among the consumers regarding safety standards. Further, TG Discoms take steps for use of safety appliances by O&M staff to avoid accidents.</i></p> <p><i>c) The TGDISCOMs are directed to bring awareness among the consumers about energy conservation measures to reduce the consumption during peak hours to optimize the power purchase cost.</i></p> <p>48. PFI notes that the aforementioned Directives are quite critical in terms of creating awareness among the consumers about loss reduction, Energy conservation and Safety Standards. Therefore, PFI urges Hon'ble TGERC to seek details on the above Directives from TG DISCOMs.</p>	<p>DISCOMs are continuously engaging in consumer awareness programs through pamphlets, banners, advertisements, social media, and workshops to improve grievance redressal and electrical safety awareness.</p> <p>TGSPDCL is committed to ensure that fatality/ injuries due to electrical accidents are brought down to 0 and is working round the clock towards this goal. TGSPDCL is taking active measures for creating awareness for precautions and safety measures during campaigns held in each district.</p> <p>For TGNPDCL year on year electrical accidents are coming down due to various factors like awareness programs on how to avoid electric accidents in the field (Like Polam Bata) are being conducted to the general public and strengthening of Distribution network, taking up of renovation and Modernization works to the network. TGNPDCL is committed to bring down the accidents to 0.</p> <p>Further TGNPDCL has appointed one Divisional Engineer as Safety Officer in each circle to educate the farmers and staff how to avoid the electrical accidents and arranging the safety kit to the O&M staff in each section level.</p> <p>Further, TGDISCOMs are continuously educating large consumers and industries on benefits for shifting loads to off-peak hours on various forums and align with existing TOD structures as part of its energy conservation measures to reduce the consumption during peak hours to optimize the power purchase cost.</p> <p>Further TGNPDCL entered the MoU with EESL on 09.07.2024 for implementation of DSM measures. As per the MoU, EESL will support the proposed DSM program through bringing in the necessary investments and</p>

		<p>technology required for providing the consumers of TGNPDCL with energy efficient appliances and equipments like Super-efficient ,Air Conditioners ,IE3 motors ,BLDC fans etc.</p> <p>Further all the Directives are compiled to the Hon'ble TGERC as per the periodicity and all the complied Directives are included in the ARR filings of FY 2025-26 of RSB.</p>
16	<p>49. MoP vide Electricity (Amendment) Rules, 2024 dtd. 10/01/2024 has specified the following with regards to Revenue Gap between approved Annual Revenue Requirement and estimated Annual Revenue from approved tariff:</p> <p><i>“23. Gap between approved Annual Revenue Requirement and estimated annual revenue from approved tariff- The tariff shall be cost reflective and there shall not be any gap between approved Annual Revenue Requirement and estimated annual revenue from approved tariff except under natural calamity conditions:</i></p> <p><i>Provided that such gap, Created if any, shall not be more than three percent of the approved Annual Revenue Requirement.....”</i></p> <p>50. The Rules have clearly specified that the tariff shall be cost reflective and there shall not be any gap between approved Aggregate Revenue Requirement and Estimated Annual Revenue from approved tariff except under natural calamity conditions. And if at all, the Gap is Created it shall not be more than 3% percent of the approved Annual Revenue Requirement.</p>	<p>The Licensee would like to submit that as per the ARR petition, considering the current tariffs and the ARR derived by the Licensee based on expected sales, power procurement cost, and other cost heads, the Revenue Gap of INR 20,151 Cr. is expected to covered through subsidy from the Government of Telangana.</p> <p>Further, the Hon'ble Commission as a standard practice also derives the cost reflective tariff (excluding government subsidy) titled Full Cost Recovery Tariff in the Tariff Orders.</p> <p>However, since the government subsidy is expected to materialize, the current tariff proposal of the Licensee is cost reflective for all practical purposes.</p>

	<p>51. It is noted from the TG DISCOMs Tariff Petition for ARR of FY 2025-26 there is a Revenue Gap of Rs. 20,151 Cr. (9,758 TG South and 10,393 TG North) at existing Tariff which is 30% of the ARR projected for FY 2025-26.</p> <p>52. Hon'ble APTEL in its judgement dated 11/11/2011 in OP 1 of 2011 has laid the significance of cost reflective tariff as follows:</p> <p><i>"56. It is to be pointed out in this context, that the legislative intent in enacting the Act, 2003 is to secure effective Regulations characterised by tariff rationalisation with timely cost reflective tariff determination based on the principles set out in Section 61 read with the National Tariff Policy. ..."</i></p> <p>53. Section 62 of the Act empowers SERCs to determine the Tariff on cost plus basis for the utilities regulated by them engaged in generation, transmission and distribution of electricity. Section 63 empowers SERCs to adopt the Tariff discovered through transparent process of bidding. Determination of cost-reflective tariff of Distribution Licensees by SERCs plays a significant role as it lays the foundation of routing revenue up the supply chain.</p> <p>54. Hon'ble Supreme Court's in its judgement in PTC India Vs. CERC dated 15/03/2010 has ruled that the term "tariff" includes within its ambit not only the fixation of rates but also the rules and regulations relating to it. Through Sections 61 and 62 of the Act, the Appropriate Commission shall determine the actual tariff in accordance with the provisions of the Act, including the terms and conditions which may be specified by the Appropriate Commission under Section 61 of the said Act. Under the 2003 Act, it becomes clear from Section 62 with Section 64, that although tariff fixation is legislative in character, the same under the Act is made appealable vide Section 111. These provisions, namely, Sections 61, 62 and 64 indicate the dual nature of functions performed by the Regulatory Commissions, viz, decision-making and specifying terms and conditions for tariff determination.</p> <p>55. Similarly, Hon'ble APTEL vide its judgment dated 4/09/2012 in Appeal No. 94 of 2012 has stated that the term 'Regulate' has got a wider scope and implication not merely confined to determination of tariff. Section 61 and 79 not only deal with the tariff but also deal with</p>	
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	<p>the terms and conditions of tariff. The terms and conditions necessarily include all terms related to tariff.</p> <p>56. Further, Tariff Policy, 2016, also states that in terms of Section 61(g) of the Act, the Appropriate Commission shall be guided by the objective that the tariff progressively reflects the efficient and prudent cost of supply of electricity.</p> <p>57. In view of above, PFI submits before Hon'ble TGERC to determine cost-reflective Tariff for FY 2025-26 as per the principles stipulated in MoP rules dated 10/01/2024.</p>	
17	<p>58. India's evolving energy storage policy framework underscores its commitment to enhancing grid flexibility and supporting renewable energy integration. Since 2019, a robust regulatory ecosystem has been crafted to support energy storage deployment through national initiatives around technical standards, legal frameworks, transmission charges, Resource Adequacy (RA) planning, market mechanisms, and financial incentives, as well as state-level initiatives.</p> <p>59. In a significant regulatory development, the MoP clarified Legal Status to ESS on January 29, 2022. The order identifies Energy Storage Systems (ESS) as an essential component of the power system under the Electricity Act of 2003, permitting ESS to function as a standalone or integrated element within generation, transmission, or distribution networks. The ESS can be operated by various entities, and standalone ESS projects can be licensed independently and granted connectivity under specific rules, encouraging broader ESS applications and ownership models.</p> <p>60. The Waiver of Inter-State Transmission System (ISTS) Charges for solar, wind (onshore and offshore), and green hydrogen projects was mandated by the Ministry of Power (MoP) on November 23, 2021, with subsequent amendments in November 2021, December 2022, and May and June 2023. This waiver also applies to Hydro Pumped Storage Projects (PSP) and Battery Energy Storage Systems (BESS) commissioned up to June 30, 2025.</p> <p>61. The Central Electricity Authority (CEA) on 28/06/2023, has established RA planning guidelines at both national and state levels, an important step forward, and has recently come up with state-wise</p>	<p>The suggestion has been noted.. The Licensee would like to submit that Telangana State has floated a tender to procure 250 MW / 500 MWh BESS. The tender is currently open and is expected to be concluded within April 2025. The Licensee also submits that the relevant petition will be filed for the Hon'ble Commission's approval prior to signing of the BESPA.</p>

RA reports with up to 5-year or 10-year RA projections. The CEA Resource Adequacy guidelines also outline a framework for incorporating ESS in RA planning.

62. Recent national and state government policies have begun to lay a foundation that will support ESS deployment and its integration into RA planning and procurement, electricity markets, and system operations.

63. The CEA in its Report for Resource Adequacy Plan¹ for the State of Telangana for the period from FY 2024-25 to FY 2034-35 has identified that:

- Telangana is likely to witness energy deficit throughout the period of study i.e. from 2024-25 to 2034-35 with the existing, planned capacity including the capacity required to meet Renewable Purchase Obligations (RPO). It was observed that the total unserved energy in the year 2034-35 is likely to be around 16684 MU. Further, it is expected that the Shortall would be maximum during the non-solar hours in the months of February and March.
- To meet the projected demand reliably, additional 5092 MW from Coal and **7918 MW /38,432 MWh from Storage** may be required with a planning reserve margin of 18%. Further, study suggests year wise short term/medium term/bilateral requirements to meet the demand optimally.

64. Many DISCOMs in the country have initiated the bidding process for ESS and for many of them the tariff discovered has also been adopted by respective SERCs. Few such DISCOMs along with their ESS proposal pertaining to the objective of Energy Arbitrage are as follows:

BESS	GUVNL Phase II (March 2024)	500 MWh
	GUVNL Phase III (June 2024)	1000 MWh
	MSEDCL (August 2024)	600 MWh
	UPPCL (August 2024)	1200 MWh
	GUVNL Phase IV (August 2024)	800 MWh
PSP	MSEDCL (Sept 2024)	24000 MWh

65. Various SERCs, have approved the Energy Storage based on the proposal received from their DISCOMs. Like, in Delhi, DERC has approved a 20 MW/ 40 MWh standalone BESS project for their

	<p>DISCOM on 1/05/2024. On 26/09/2024, MERC approved the procurement of 1000 MW of energy storage from pumped hydro storage (PHS) projects in Maharashtra, with an additional greenshoe option of 2000 MW, allowing for potential expansion. The bid results, as outlined in MERC's order, provide a benchmark for competitive energy storage costs in the region. For projects designed to discharge up to 8 hours daily, with a maximum continuous discharge of 5 hours-enabling two cycles per day-the levelized cost of storage is estimated at 3.2 per kWh. This price is highly competitive.</p> <p>66. Standalone and co-located ESS can play an important role in meeting RA requirements under India's emerging RA framework. Going forward, state-level RA frameworks need to be closely aligned with long-term planning and resource procurement processes to support cohesive implementation.</p> <p>67. However, in the Tariff Petition for ARR of FY 2025-26, it is noted that the TG DISCOMs have not submitted any proposal for compliance of ESS target. In view of above, PFI submits that Energy Storage is an effective tool for Energy arbitrage for DISCOMs in optimization of their Power Purchase Cost. For instance, in BESS, Batteries can be charged in the off-peak hours and can be discharged in Peak hours, thus, avoiding reliance of DISCOMs on high-cost short term Power from markets or not scheduling the high-cost Power Plants. With steep reduction in Battery prices in CY 2024 and active participation by various DISCOMs, as stipulated above, TG DISCOMs necessitates to also consider Energy Storage as part of their Power Procurement Planning in line with Resource Adequacy Planning formulated by CEA.</p>	
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18	<p>68. PM Surya Ghar: Muft Bijli Yojana, the world's largest domestic rooftop solar initiative, is transforming India's energy landscape with a bold vision to supply solar power to one crore households by March 2027. By March 2025, installations under the scheme are expected to exceed 10 lakh, with the numbers doubling to 20 lakh by October 2025, reaching 40 lakh by March 2026, and ultimately achieving the target of one crore by March 2027• The scheme is projected to add 30 GW of solar capacity through rooftop installations in the residential sector, significantly contributing to India's renewable energy goals.</p> <p>69. Through this rooftop solar scheme many domestic consumers will have Net metering connections which will have a sizeable impact on the domestic category sales. However, in the Tariff Petition for ARR of FY 2025-26, it is noted that the UPCL have not submitted any proposal related to PM Surya Ghar - Muft Bijli Yojna.</p> <p>70. Further, TG DISCOMs have also not submitted any proposal related to Demand Side Management (DSM) initiatives. DSM is a strategic approach to energy conservation that seeks to manage consumer demand for energy rather than simply supply it. It is a coordinated set of activities and programs undertaken by electric utilities, developers, government agencies, and end-use customers to ensure that electric power service can be delivered to consumers at the lowest cost consistent with reliable supply. DSM also seeks to promote energy conservation and peak load reduction rough voluntary or mandatory actions taken by the above-mentioned participants.</p> <p>71. In view of above, PFI submits that Sales forecast for TG DISCOMs in ARR of FY 2025- 26 may be done considering the impact of PM Surya Ghar - Muft Bijli Yojna and Demand Side Management (DSM) initiatives.</p>	<p>TGDISCOMs have estimated domestic sales for FY 26 considering H1 actuals of FY 25 and projected H2 of FY 25 basis H2 actuals of FY 24.</p> <p>Further for the purpose of projections, TGDISCOMs have considered relevant historical Compounded Annual Growth Rates for domestic consumer categories separately for each of the Discoms after consideration of initiatives undertaken by central and state government including PM Surya Ghar - Muft Bijli Yojana to arrive at the projected sales of FY 26 at the state level.</p> <p>Presently Demand Side Management at domestic consumer level is at an early stage and therefore will not be affecting sales significantly.</p> <p>Hence, the licensees would like to submit before the Hon'ble Commission that the sales projections made by them be considered for ARR computations as it is systematic and logically arrived.</p>
19	<p>72. Electricity (Rights of Consumers) Amendment Rules, 2023 dtd. 14/06/2023 stipulates that every consumer category except Agriculture should have Time of Day (TOD) Tariff with effect from 01/04/2025 and shall be made effective immediately after installation of Smart Meters, for consumers with Smart Meters.</p> <p>73. Further, the Rules also stipulate that ToD Tariff for Commercial and Industrial consumers during peak period of the day shall not be less</p>	<p>The Licensee currently has ToD tariff regime implemented for selected HT consumers. Further, in the current ARR filing, the Licensee has not to propose any tariff hikes for any of the consumer categories. In relation to that, the Licensees have decided not to alter the tariff structure or the structure for the current ARR filings as the same may</p>

<p>than 1.20 times the normal tariff and for other consumers, it shall not be less than 1.10 times the normal tariff. Further ToD during Off-peak hours should be at least 20% less than the normal tariff (not more than 80% of the normal tariff). Although, the MP DISCOMS have proposed Off-peak and peak Tariff for HT and LT consumers (except Domestic) which is in compliance with the Consumer Rules formulated by MoP.</p> <p>74. However, it is to be noted that TG DISCOMs have not proposed any Peak hours ToD for Domestic consumers upto 10 kW, where Smart Meters have been installed for FY 2025-26.</p> <p>75. Further, TG DISCOMs have also not submitted the status of ToD in their area (tariff category wise). The said status report should provide benefit derived from ToD through flattening of Load Curve and avoiding procurement of costly power in Peak Period.</p> <p>76. PFI observes that the cost of power purchase during peak hours is quite high. Time of Day (ToD) Tariff is an important Demand Side management (DSM) measure to flatten the load curve and avoid such high -cost peaking power purchases. Accordingly, in ToD Tariff regime peak hour consumption is charged at higher rates which reflect the higher cost of power purchase during peak hours. At the same time, a rebate is being offered on consumption during off-peak hours. This is also meant to incentivise consumers to shift a portion of their loads from peak time to off-peak time, thereby improving the system load factor and flattening the load curve. The ToD Tariff is aimed at optimizing the cost of power purchase, which constitutes over 80% of the Tariff charged from the consumers. It also assumes importance in the context of propagating and implementing DSM and achieving energy efficiency.</p> <p>77. Introduction of higher peak hour Tariff would initially generate additional revenue which would compensate for the reduction in revenue on account of lower Tariff during off peak hours. In the long run, this would provide signals to the consumers to reduce load during peak hours and, wherever possible, shift this consumption to off-peak hours. Any loss of revenue to the utility on account of shifting of load from peak to off-peak hours in the long run would by and large get</p>	<p>indirectly lead to tariff hikes for the different consumer categories.</p>
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	<p>compensated by way of reduction of off-peak surplus to the extent of increase in off-peak demand.</p> <p>78. The ToD Tariff would thus have immediate as well as long-term benefits for both, consumers as well as the utility and contribute towards controlling the rise in power purchase costs</p> <p>79. Thus, PFI requests Hon'ble TGERC to formulate ToD Tariff for all eligible consumers in line with the MoP Electricity (Rights of Consumers) Amendment Rules, 2023 dtd. 14/06/2023 as amended from time to time.</p>	
20	<p>PRAYERS BEFORE HON'BLE TGERC:-</p> <p>1) To consider the comments / suggestions of Power Foundation of India (PFI) on the ARR and Retail Supply Tariff Petitions (O.P. No. 21 of 2025 & I.A.No.04 of 2025 for TGSPDCL and O.P. No. 22 of 2024 & I.A.No.OS of 2025 for TGNPDCL).</p> <p>2) To provisionally disallow 13,790 MU of the Sales, i.e., 50% of the unmetered Energy Sales and corresponding Power Purchase Cost of Rs. 7,378 Cr. The inefficiencies of TG DISCOMs should not be allowed to pass through to the end consumers and the Govt. of Telangana should bear the same in the form of subsidy.</p> <p>3) To allow Power Purchase expenses as per the applicable Regulatory provisions and as worked out by PFI and disallow Rs. 9,177 Cr.(Rs. 3,327 Cr.of TGNPDCL and Rs. 5,850 Cr. of TGSPDCL) for FY 2025-26.</p> <p>4) To allow Distribution cost comprising of Operations and Maintenance Expenses, Depreciation, Interest on Loan, RoE and Interest on Working Capital as per the submission made by PFI vide its letter dtd. 31/01/2025 in respect of Distribution ARR Petitions for FY 2025-26 and accordingly consider its impact of reduction by Rs. 1,524 Cr. in the Retail Supply Tariff ARR.</p> <p>5) To consider PFI working for Operation and Maintenance Expenses, Depreciation, Finance Charges and RoE pertaining to Retail Supply</p>	<p>The responses for the same has been provided above.</p> <p>Hence no comments are required in this section.</p>

	<p>Business and allow only the prudent cost to TGDISCOMs in the ARR of FY 2025-26 by reduction of Rs. 133 Cr.</p> <p>6) To consider the PFI submission for computing Revenue from Cross Subsidy Surcharge for TGSPDCL and accordingly computing ARR and Revenue for FY 2025-26 for TG DISCOMs by increasing revenue by Rs. 29 Cr.</p> <p>7) Any inefficiencies of TG DISCOMs should not be allowed to pass through to the end consumers and the Govt. of Telangana should bear the same in the form of subsidy.</p> <p>8) Hon'ble TGERC to direct TG DISCOMs to expedite the approval process of RDSS for betterment of the Power Sector in the State of Telangana.</p>	
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Response to Telangana Solar Open Access Developers Association

Telangana Solar Open Access Developers Association, #8-3-224/4/A, Pt. No. 11&1,2 Sy. No. 01, Room No. 412, Madhura Nagar, Yousufguda, Hyderabad – 500 038; Email: tsoada.hyd@gmail.com		
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p>Grid Support Charges (GSC):-</p> <p>Background It was mentioned that the rationale for levy of GSC originated due to benefits certain co-located captive consumers are availing during their parallel operation with the licensees' grid network.</p> <p>Hon'ble APTEL had allowed Appeal No. 228 of 2022 and Appeal No. 391 of 2023 filed by Rain CII Carbon (Vizag) Ltd. & Others Vs APERC in respect to Determination and applicability of Grid Support Charges (GSC) and held that levy of Grid support charges shall be limited to only the power consumed by the co-located captive load. Hon'ble APTEL through these orders had already set aside applicability of the GSC for non-co-located power plants.</p> <p>In line with the Hon'ble APTEL orders, the terms and conditions of GSC were modified as below by Hon'ble TGERC in its Retail Supply Tariff order dated 28.10.2024.</p> <p>"6.16.7 The GSC will be applicable only on Captive Power Plants (CPPs) and the levy shall be limited to only the power consumed by the co-located load.</p> <p>6.16.8 The GSC is not applicable for the following: A. Captive Power Plants (both Renewable and Conventional) which are not co-located. B. IPPs (both Renewable and Conventional). C. Solar Roof Top plants D. Generators which have PPAs with TGDISCOMs"</p>	<p>The solar OA generators also require grid support as much as co-located captive plants. Hence, the Licensee has proposed to levy Grid Support Charges for all other categories of power plants. However, the Licensee shall abide by the directions of the Honorable Commission.</p>

	<p>Familiar with the above ruling the Licensee has been trying to misguide the Hon'ble Commission by trying to expanded the scope/applicability of levy of such GSC on Captive Power Plants (both Renewable and Conventional) both co-located and not co-located, IPPs (both Renewable and Conventional) & Solar Roof top plants and Generators having partial PPAs with the Licensee over and above PP capacity, basically covering universe of power plants. In our opinion, Licensee should restrain from making such proposals that are against rules, orders and regulations and therefore, the levy of GSC should be limited to only co-located captive load.</p> <p><u>DISCOMs have been misguiding the honorable commission time and again in their proposals to expand the scope of levy of GSC and therefore the levy of GSC should be restricted to only co-located captive power plants, which work in parallel with the grid.</u></p>	
2	<p>The standby charges:- The definition and conditions of levy of stand-by charges are derived from the Electricity Rules, 2022, Dated: 06.06.2022, which is extracted below.</p> <p><i>(4) The standby charges, wherever applicable, shall be specified by the State Commission and such charges shall not be applicable if the Green Energy Open Access Consumers have given notice, in advance at least twenty-four hours before the time of delivery of power, for standby arrangement to the distribution licensee:</i></p> <p><i>Provided that the applicable standby charges shall not be more than ten per cent of the energy charges applicable to consumer tariff category.</i></p> <p><i>Explanation: For the purposes of this rule, (i) the expression – standby charges means the charges applicable to open access consumers against the standby arrangement provided by the distribution licensee, in case the open access consumer is unable to procure power from the generating sources with whom they have the agreements to procure power due to outages of generator, transmission assets and the like.</i></p>	<p>As the consumer is utilizing supply under captive or third party open access agreements, the power plants of the generators with which the licensees have entered into PPA becomes stranded and the licensee is bound to pay the fixed charges towards his power purchase commitments. Whenever such open access consumer switches to DISCOM, the DISCOM has to make alternative arrangement for providing supply to such OA consumers on demand. The entire fixed cost commitment of the DISCOMs is not being recovered through demand charges. Hence, the OA consumers are liable to make the payment of standby charges for the alternative arrangements by the DISCOM as per the provisions of the Electricity Amendment Rules by MOP, GOI</p>

	<p><i>(ii) It is hereby clarified that in such situations the open access consumer has to take power from an alternate sources like the distribution licensee and the charges for maintaining standby arrangements for such consumers should be reflective of the costs incurred by distribution licensee for providing these support services.</i></p> <p>As such several State Electricity Regulatory commissions have clarified this position. For instance, APERC has clarified in its order dated: 01.05.2024 in Regulation No. 3 of 2024 as below:</p> <p><i>“As long as the Consumer avails power up to the contracted demand with the DISCOMS, the question of standby charges does not arise. The Standby charges are incorporated in the Regulation to address the issue of exigencies of Open Access Users and the consumers may avoid penalties from the DISCOMs for drawing power over and above the CMD by availing the standby option during exigencies.”</i></p> <p>In the current scenario,</p> <ul style="list-style-type: none"> • TGSPDCL is allowing Open Access / Green Energy Open Access within Consumer CMD only • DISCOMs are duty bound to provide electricity on demand within the Contract Maximum Demand (CMD) as the fixed charges for the respective CMD are paid by the consumer. • Since the consumer is already paying the fixed charges for the CMD, the question of payment of standby charges does not arise. • Standby charges only come into play in cases where DISCOMs provide Open Access beyond the CMD of the consumer. <p><u>Hence, the proposal for standby charges must be completely rejected.</u></p>	
3	<p>Need for separate category for startup power of renewable generating sources;-</p> <p>It is humbly submitted that several states have incorporated a separate category for RE startup power'. The relevant extracts from APERC are re produced for the quick reference of this Honorable commission.</p>	<p>The DISCOMs are levying the charges on the power plants for Start-up activity determined by the Hon'ble Commission in the Tariff Order which are less than that of the retail consumers. Hence, no separate category is required for start- up activity.</p>

	<p>CATEGORY-II (B): STARTUP POWER – HT</p> <p>Applicability</p> <p>The tariff is applicable for supply of electricity to startup power for Captive Generating Plants or Co-Generation Plants or Renewable Energy Generation Plants and Merchant plants.</p> <p>The Startup Power is intended for those generators who require occasional and intermittent supply for startup operations of the generating unit(s) alone. However, the Captive and Cogeneration plants with their process plants being located in the same premises and have single connection with the grid (APTransco / DISCOMs) and who continuously depend on the licensees' supply for part of their energy requirement may be given option to either continue in their present category or to be included in this new category. Without giving an opportunity to all such generators to exercise option in this regard, the category change shall not be affected.</p> <p>The conditions applicable for Startup Power are as follows:</p> <ol style="list-style-type: none"> 1. Supply is to be used strictly for generator start-up, operations, maintenance and lighting purposes only. 2. Allowable Maximum Demand shall be limited to the percentage (as given below) of the maximum capacity unit in the generating station in case of generators other than Wind and Solar, and of the plant capacity in case of Wind and Solar generator. Thermal – 15%, Gas based – 6%, Hydel – 3%, NCE Sources – 10%, Wind and Solar – 2% 3. If the Maximum Demand exceeds the limits specified above, the energy charges shall be charged at 1.2 times of normal charge for the entire energy consumed. 4. All other conditions applicable to Category II: Commercial & Others-HT shall also apply to the Category II(B): Startup Power-HT to the extent they are not contradictory to the above. 5. This category is also applicable to all the Wind and solar plants who have PPAs with the licensees. 	
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	<table> <tr> <th><i>Voltage of Supply</i></th><th><i>Demand Charges (Rs./kVA/month)</i></th><th><i>Energy Charges (Rs./kVAh)</i></th></tr> <tr> <td><i>All Voltages</i></td><td><i>Nil</i></td><td><i>12.25</i></td></tr> </table>	<i>Voltage of Supply</i>	<i>Demand Charges (Rs./kVA/month)</i>	<i>Energy Charges (Rs./kVAh)</i>	<i>All Voltages</i>	<i>Nil</i>	<i>12.25</i>	
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	<p>Note: in respect of cogeneration sugar plants, the billing shall be in accordance with the specific clauses of the power purchase agreements.</p> <p><u>Therefore, it is requested that the Honorable Commission to notify separate category for solar RE generators without any fixed charges in line with the above provisions.</u></p>							

Response to National Highways Authority of India

National Highways Authority of India, (MoRTH), Project Implementation Unit, Plot No. 65, Kothari Layout, Venkatesh Nagar, Gulbarga – 585102						
S.No.	Summary of Objections / Suggestions	Response of the Licensee				
39	<p>In view of the above submissions, it is humbly prayed that in terms of the mandate under Section 64(3) of the Act, Clause 94.1 of the TSERC MYT Regulations, and the judicial precedents cited above, this Hon'ble Commission while determining the Tariff and ARR in O.P Nos. 21 and 22 of 2025 for Telangana Discoms, may include street lighting on National Highways under 'LT-VI (A) Street Light' category. To this extant, necessary changes may be carried out in the 'Applicability' section of the 'LT-VI Street Lighting and PWS Schemes' category, as under:</p> <table><tr><td><p>Existing 'Applicability' clause for LT-VI Street Lighting and PWS Schemes category as per Retail Tariff Order dated 28.10.2024</p></td><td><p>Proposed 'Applicability' clause for LT-VI Street Lighting and PWS Schemes category</p></td></tr><tr><td><p>9.7. LT-VI: STREET LIGHTING AND PWS SCHEMES</p><p>Applicability</p><p>9.7.1. Applicable for supply of energy for lighting on public roads, streets, thoroughfares including Parks, Markets, Cart-stands, Taxi stands, Bridges and also for PWS schemes and Mission Bhagiratha schemes in the Local Bodies viz., Panchayats / Municipalities / Municipal Corporations. Metering is compulsory irrespective of tariff structure.</p><p>[...]</p></td><td><p>9.7. LT-VI: STREET LIGHTING AND PWS SCHEMES</p><p>Applicability</p><p>9.7.1. Applicable for supply of energy for lighting on public roads, streets, National Highways, thoroughfares including Parks, Markets, Cart-stands, Taxi stands, Bridges and also for PWS schemes and Mission Bhagiratha schemes in the Local Bodies viz., Panchayats / Municipalities / Municipal Corporations. Metering is compulsory irrespective of tariff structure.</p><p>[...]</p></td></tr></table>	<p>Existing 'Applicability' clause for LT-VI Street Lighting and PWS Schemes category as per Retail Tariff Order dated 28.10.2024</p>	<p>Proposed 'Applicability' clause for LT-VI Street Lighting and PWS Schemes category</p>	<p>9.7. LT-VI: STREET LIGHTING AND PWS SCHEMES</p> <p>Applicability</p> <p>9.7.1. Applicable for supply of energy for lighting on public roads, streets, thoroughfares including Parks, Markets, Cart-stands, Taxi stands, Bridges and also for PWS schemes and Mission Bhagiratha schemes in the Local Bodies viz., Panchayats / Municipalities / Municipal Corporations. Metering is compulsory irrespective of tariff structure.</p> <p>[...]</p>	<p>9.7. LT-VI: STREET LIGHTING AND PWS SCHEMES</p> <p>Applicability</p> <p>9.7.1. Applicable for supply of energy for lighting on public roads, streets, National Highways, thoroughfares including Parks, Markets, Cart-stands, Taxi stands, Bridges and also for PWS schemes and Mission Bhagiratha schemes in the Local Bodies viz., Panchayats / Municipalities / Municipal Corporations. Metering is compulsory irrespective of tariff structure.</p> <p>[...]</p>	<p>The Licensee considers street lighting in access controlled highways under LT-II(B) Commercial due to the nature of access controlled highways wherein consumers are charged a toll to access and use such highway facilities. The act of charging a toll to access / use any facilities comes under the purview of commercial use in the opinion of the Licensee and as such the Licensee submits that NHAI street lighting be considered under LT-II (B) category. However, the Licensee will abide by the directions of the Hon'ble Commission in this regard.</p>
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<p>We submit the above for your kind consideration and request the Hon'ble Commission to pass such orders as the Hon'ble Commission may deem fit and proper in the facts and circumstances mentioned above.</p>						

Response to Venkata Naresh Konakandla

Venkata Naresh Konakandla, General Secretary Telangana State Solar Open Access Developers Association (TSOADA), Member Energy Committee, FTCCI, Independent Member – CGRF (Rural) TGSDPCL		
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	<p><u>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)</u></p> <p>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 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.</p>	Not pertains to TGNPDCL
2	<p><u>2) Introduction of Concept of Actual Voltage and Specified Voltage:</u></p> <p>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 through various orders, have already ordered and instructed TGSPDCL to follow billing at supply voltage tariff in line with TGERC GTCS amendment.</p> <p>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.</p>	Not pertains to TGNPDCL

రిటైల్ సప్లయ్ వ్యాపారముకోసము 2025-26 ఆర్థిక సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు దరల ప్రతిపాదనలు & క్రాస్సబ్సిడీ సర్పార్టీ ప్రతిపాదనలు పై శశిభూషణ్ కాచె, ఆడ్వకేట్, స్టేట్ కో ఆర్డినేటర్, కిసాన్ కాంగ్రెస్, ఇంటి నెం:8-55, నడివీధి, మంథని 505184, సెల్ నెం 9440087990

పెద్దపల్లి జిల్లా గారి సూచనలు/సలహాలకు సమాధానాలు.

క్రమసంఖ్య	అభ్యంతరాలు /సూచనలు	TGNPDCL - సమాధానాలు
1.	విద్యుత్ ప్రమాదాల నివారణకు పటిష్టమైన చర్యలు చేపట్టాలి. రక్షణ వ్యవస్థను బలోపేతం చేసి ప్రమాదాలు నివారించాలి. విద్యుత్ ప్రమాదాలలో నష్టపోయిన/మృతి చెందిన వ్యక్తుల కుటుంబాలకు సత్వరం ఎక్స్ గ్రేషియా అందించాలి. పశువులు నష్టపోయిన వారికి సత్వరం ఎక్స్ గ్రేషియా అందించాలి.	విద్యుత్ ప్రమాదాల నివారణకు NPDCL సంస్థ ప్రత్యేకంగా సేఫ్టీ ఆఫీసర్లను నియమించడం జరిగింది. ఇట్టి సేఫ్టీ ఆఫీసర్ విధిగా అన్ని జిల్లాల్లోని అన్ని ప్రాంతాల్లో విద్యుత్ ప్రమాదాల నివారణకు అవగాహన సదస్సులు నిరంతరం నిర్వహించడం జరుగుతుంది. విద్యుత్ ప్రమాదంలో చనిపోయిన వ్యక్తుల కుటుంబాలకు సంబంధిత పత్రాలు అందించిన వెంటనే ఎక్స్ గ్రేషియా అందించటం జరుగుతుంది మరియు పశువులను నష్టపోయిన వారికి కూడా తక్షణమే ఎక్స్ గ్రేషియా అందించడం జరుగుతుంది.
2.	విద్యుత్ చౌర్యం, సామర్థ్యం ఉండి విద్యుత్ బకాయిలు చెల్లించని వ్యక్తుల పై చట్టప్రకారం చర్యలను చేపట్టాలి.	విద్యుత్ చౌర్యం మీద విజిలెన్స్ విభాగం మరియు ఆపరేషన్ విభాగం ప్రతినెల తనిఖీలు నిర్వహించి కేసులు రిజిస్టర్ చేసి చట్ట ప్రకారం చర్యలు తీసుకోవడం జరుగుతుంది. CC ఛార్జీలు చెల్లించనందుకు సత్వరమే కనెక్షన్లు తొలగించడం జరుగుతున్నది.
3.	రాష్ట్రంలో అమలవుతున్న రైతులకు ఉచిత విద్యుత్ కు పంపిణీ సంస్థలకు ప్రభుత్వం చెల్లిస్తున్న వివరాలు.	ఆర్థిక సంవత్సరం 2024-25 లో TGNPDCL కు ఫిబ్రవరి -2024 వరకు ప్రభుత్వం నుండి వ్యవసాయ ఉచిత విద్యుత్ సబ్సిడీ క్రింద రూ॥ 5,788 కోట్లు వచ్చినాయి.

4.	రాష్ట్రంలో అమలవుతున్న గృహజ్యోతి లబ్ధిదారులకు పంపిణీ సంస్థల వారిగా ప్రభుత్వం చెల్లిస్తున్న సబ్సిడీ వివరాలు.	రాష్ట్ర ప్రభుత్వం 03/2024 నుండి 02/2025 వరకు TGNPDCL కి గృహ జ్యోతి సబ్సిడీ క్రింద రూ. 924.60 కోట్లు వచ్చినాయి.
5.	రాష్ట్రంలో చేతి వృత్తుల వారికి అందిస్తున్న 250 యూనిట్లు ఉచిత విద్యుత్, చేనేత మర మగ్గాల ప్రభుత్వం అందిస్తున్న సబ్సిడీ వివరాలు.	<p>1. నాయి బ్రాహ్మణులు, లాండ్రీలు & ధోబీఘాట్ల వినియోగదారులకు నెలకు 250 యూనిట్ల వరకు ఉచిత విద్యుత్ సరఫరా చేయబడుతున్నది. 2024-25 ఆర్థిక సంవత్సరంలో నాయీ బ్రాహ్మణులకు రూ. 7.19 కోట్లు మరియు లాండ్రీ & ధోబీ ఘాట్ల వినియోగదారులకు రూ. 23.89 కోట్లు సబ్సిడీ అందించడం జరిగినది.</p> <p>2. 2024-25 ఆర్థిక సంవత్సరంలో పవర్ లూమ్ (చేనేత మర మగ్గాల) వినియోగదారులకు రూ. 0.66 కోట్లు 50% టారిఫ్ సబ్సిడీ క్రింద అందించడం జరిగినది.</p>
6.	వ్యవసాయ విద్యుత్ కనెక్షన్ మంజూరు కొరకు పంపిణీ సంస్థలు తీసుకుంటున్న కాలవ్యవధి పై సమీక్ష.	<ul style="list-style-type: none"> • నెల వారిగా గౌరవనీయులైన Hon'ble CMD గారు, Director గారు మరియు SE/OP (ఆపరేషన్) గారు ఇవ్వవలసిన వ్యవసాయ విద్యుత్తు కనెక్షన్స్ మీద సెక్షన్ ఆఫీసర్ లెవల్ వరకు సమీక్ష చేయడం జరుగుతుంది. • రెగ్యులర్ గా DE/ADE/AE/Commercial, Corporate Office, సర్కిల్ ఆఫీస్, డివిజన్ ఆఫీస్ అందరు కూడా అప్లికేషన్ వారిగా టైమ్ లైన్ ప్రకారం ప్రతి స్టేజ్లో అవి పీజిబిలిటీ ఎస్టిమేట్ వేయ వలసినవి సాంక్షన్ చేయవలసినవి వర్క్ ఆర్డర్ తీసుకోవలసినవి, మరియు వర్క్ చేస్తున్నవి రిలీజ్ అయ్యేవరకు పర్యవేక్షణ చేయడం జరుగుతుంది. • ఎస్టిమేట్ ఆన్లైన్ లో పంపి విధానం కొత్తగా తీసుకు రావడం జరిగింది. దీని వలన టైమ్ కూడ సేవ్ అవుతుంది. • వినియోగ దారుడు తన యొక్క అప్లికేషన్ స్టేటస్ ను ఎప్పటికప్పుడు ప్రతి స్టేజి లో మెన్స్జే ద్వారా

		<p>తెలుగులో పంపడం జరుగుతుంది. అవి ఫీజిబిలిటీ సాంక్షన్ అయినాక ఏమేమి మెటీరియల్ ఎస్టిమేట్ లో వేసినారు. మరియు స్కెచ్ కూడ, డిమాండ్ నోటీసు కూడ తెలుగులో మెస్సేజ్ ద్వారా ఇవ్వడం జరుగుతుంది.</p> <ul style="list-style-type: none"> టార్గెట్స్ కూడ ప్రతి సెక్షన్ లెవల్, Sub-Division లెవల్ Divisions మరియు సర్కిల్ వారిగా ఇచ్చి అవి రిలీజ్ అయ్యే విధంగా చూడటం జరుగుతుంది. <ul style="list-style-type: none"> సర్వీసులు రిలీజ్ ఈ క్రింది కారణాల వలన ఆలస్యము అవుతున్నాయి తప్ప వేరే కారణాలు ఏమి లేవు. <p>i) వినియోగదారుడు సరియైన డాక్యుమెంట్ పేపర్స్ టైముకు ఇవ్వలేకపోవడం.</p> <p>ii) పేమెంట్స్ లేటుగా కట్టడం.</p> <p>(iii) లైన్ లు వేసే దగ్గర పంటలు వేసి ఉండటం.</p> <p>(iv) పక్కవాళ్లు లైన్ వేయనీయక పోవడం.</p> <p>(v) ఫారెస్ట్ ప్రాబ్లమ్స్ ఉండటం.</p> <p>(vi) కెపాసిటర్స్ బిగించుకోక పోవడం.</p> <ul style="list-style-type: none"> వినియోగదారు ని యొక్క అప్లికేషన్స్ ఏజ్ వైజ్ గా కూడ మానిటరింగ్ చేయబడుతుంది. <ul style="list-style-type: none"> డిపార్ట్మెంట్ ఎప్పుడు కూడ వ్యవసాయ విద్యుత్తు కనెక్షన్స్ రిలీజ్ చేయడం కొరకు మొదటి ప్రాధాన్యతనిస్తు కావాల్సిన మెటీరియల్స్ ను కూడా అందు బాటులో ఉంచడం జరుగుచున్నది.
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Response to Prayas Energy Group

1. Prayas Energy Group, Unit III A & B, Devgiri, Joshi Railway Museum lane, Kothrud Industrial Area, Kothrud, Pune, MH – 411 038, Email: energy@prayasgroup.org																																			
S.No.	Summary of Objections / Suggestions		Response of the Licensee																																
1	<p>General Suggestions</p> <p>The Retail Supply Tariff order for FY25 was issued only in October 2024 and the Tariff process for FY26 has been is delayed with the DISCOM petitions being filed only in February 2025, instead of November 2024, as specified by the MYT Regulations. Such delays are not healthy and we hope that, in future the DISCOMs would file petitions in time.</p> <p>On the TGERC website, TGSPDCL filing has only the pdf version of petition and RSB formats, while NPDCL has pdf version and RSB formats in spreadsheet format (Additional information). But the websites of TGSPDCL and TGNPDCL have all the details, including the spreadsheet file of RSB formats. We request Hon'ble TGERC to upload TGSPDCL RSB formats in spreadsheet format on its website.</p>		Objectors' concerns are noted. The Licensee was constrained to file delayed petitions due to reasons mentioned in the petition. The Licensee has also filed condonation of delay petition requesting the Hon'ble Commission to accept the delayed petition.																																
2	<p>Power Purchase Planning</p> <p>As per the petitions, there is expected to be 21.4% energy surplus in FY26, most of which DISCOMs plan to sell, as shown in Table 1.</p> <p>Table 1: Surplus power as per DISCOM petitions</p> <table><tr><th>Detail</th><th>SP</th><th>NP</th><th>Total</th></tr><tr><td>Energy available MU</td><td>88,498</td><td>36,566</td><td>1,25,064</td></tr><tr><td>Energy dispatch MU</td><td>71,176</td><td>27,143</td><td>98,319</td></tr><tr><td>Surplus MU</td><td>17,322</td><td>9,423</td><td>26,745</td></tr><tr><td>Surplus as % of Available</td><td>19.6</td><td>25.8</td><td>21.4</td></tr><tr><td>Surplus sale projected MU</td><td>17,228</td><td>7,217</td><td>24,445</td></tr><tr><td>Revenue from Surplus sale Rs Cr</td><td>2,768</td><td>1,155</td><td>3,923</td></tr><tr><td>Rs/Unit of surplus sale</td><td>1.61</td><td>1.60</td><td>1.60</td></tr></table> <p>Source: Compiled by Prayas (Energy Group) from RSB Form 8 and 10, and ARR petitions of the DISCOMs</p>		Detail	SP	NP	Total	Energy available MU	88,498	36,566	1,25,064	Energy dispatch MU	71,176	27,143	98,319	Surplus MU	17,322	9,423	26,745	Surplus as % of Available	19.6	25.8	21.4	Surplus sale projected MU	17,228	7,217	24,445	Revenue from Surplus sale Rs Cr	2,768	1,155	3,923	Rs/Unit of surplus sale	1.61	1.60	1.60	<p>The Licensee has determined projections for power purchase based on MW matching principle wherein the hourly block wise MW is matched to available generating sources. In cases where the available generating sources are not adequate to meet the projected demand, the Licensee is required to move to market purchase to fulfill the demand and conversely, in cases where available generation sources are greater than projected demand, energy is sold to the market.</p> <p>The Licensee is also exploring Energy Storage Solutions as indicated in the Telangana Clean and Green Energy Policy 2025. In this regard, TGGENCO had floated a tender for BESS capacity of 250 MW / 500 MWh which is currently under tendering. With regards to the new PPAs,</p>
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	<p>Projected annual energy surplus is high at 21.4% of the energy available. DISCOMs hope to sell most of this surplus at a net revenue of Rs.1.60/unit. As indicated by the DISCOMs, short term power purchase from the market would also be needed to meet the supply-demand mismatch during some blocks. This is understandable, but shows the need to improve power purchase planning.</p> <p>As we had suggested in our submissions in October 2024 during the previous tariff process, there is a need to revisit the power purchase plan of DISCOMs, with better demand forecast. To optimise power purchase cost, it is good to plan for higher proportion of renewable, with required storage for grid balancing and depend on the market, as needed. The Resource Plan order (dated 29/12/2023) and the previous DISCOM petitions did not provide plans for BESS deployment. But the Telangana Clean and Green Energy Policy 2025 envisages 3388 MW of BESS by FY30. DISCOMs are requested to provide any plans they have for BESS deployment. DISCOMs should not enter into long term PPAs with any plants which are not part of an optimised Resource Plan. Market sale and purchase should be optimised to ensure demand-supply balance and optimise costs.</p> <p>TGGENCO also has to play a significant role in energy transition. Their thermal power plants need to become more flexible and they can also plan renewable energy projects.</p>	<p>the Licensee would like to submit that the new PPAs are entered into with prior approval from the Hon'ble Commission but the Objectors point has been noted.</p>
3	<p>Agriculture energy consumption estimation</p> <p>For the past many years, LT-Agriculture consumption is reported to be nearly one-third of the total consumption in Telangana. This is a non-metered free power category and hence better estimation of energy consumption is crucial. DISCOMs have used growth rate to estimate agriculture consumption for FY26. They have not been able to meet the repeated directives by Hon'ble TGERC to meter all agriculture Distribution Transformers. From the previous tariff petition, DISCOMs have been stating that they plan to segregate feeders under RDSS and that would help to improve the estimation of agriculture consumption. But the timeline for feeder segregation is not provided, possibly since</p>	<p>TGDISCOMs projected sales in LT V category based on the actuals of FY 2023-24 which is derived from ISI methodology where the meters available to AGL DTRs as sample DTRs and the services of agriculture is increasing in FY 2024-25 compare to last year so far and expecting to release more services in FY 2024-25 as works are under progress. Further the Licensees considered the Trend methodology by this the CAGR is proposed to arrive sales of H1 of FY 2024-25 on H1 of FY 2023-24, similarly sales for</p>

<p>the RDSS proposal has to be approved by MoP and then the work has to start in Telangana.</p> <p>In the Tarif order dated 28/10/2024 (Section 4.1.5, pp108), Hon'ble TGERC has laid out the procedure it has used for agriculture consumption estimation. This procedure calculates the specific consumption (Units/hp/year) of pumpsets in NPDCL and SPDCL, using historical data from FY20 to FY24. The contracted demand has been escalated by 5%/year to derive contracted demand for FY 2024-25. The pump operational period considered is 180 days for both DISCOMs, 12 hours per day for SPDCL and 9 hours per day for NPDCL. This method has merits, but the results are sensitive to the quality of historical data (on consumption and contracted demand), as well as the assumptions on contracted demand growth and hours of pump operation in a year.</p> <p>We suggest that agriculture consumption could be better estimated using feeder meter data, even before feeder segregation is implemented. All 11 kV feeders in Telangana are reportedly metered. For mixed feeders, non-agriculture consumers are hopefully metered and mapped to the feeder. This metered consumption and expected losses (11 kV feeder, DT and LT lines) could be subtracted from feeder meter reading to arrive at the agriculture consumption.</p> <p>This method with variations has been used by many states and AP has started doing this recently. Hon'ble TGERC could consider preparing guideline for this method.</p> <p>The guideline could cover the possible challenges in this method, such as the loss figures to be considered and the quality of metered consumption, as detailed in the following sentences. Energy loss figures could be based on approved figures in DISCOM MYT order. But these need to be fine-tuned based on periodic sample field measurements of actual losses on different types of feeder configurations, depending on length of 11 kV feeder, loading pattern, number of DTs, length of LT network etc. For long and heavily loaded</p>	<p>FY 2025-26 the CAGR is considered on FY 2024-25 sales. Pending agricultural connection requests indicates need for supply of electricity. Additionally, feeders connected to these agricultural connections at substation level are being monitored.</p> <p>Hence, the licensees would like to submit before the Hon'ble Commission that the sales projections for agricultural category made by them be considered for ARR computations as it is systematic and logically arrived.</p>
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	<p>agriculture feeders, loss could be high (observed 6-24% in Maharashtra). Metered consumption is to be subtracted and hence the quality of metered data is to reported. Details such as number of invalid meter readings and issues with consumer mapping needs to be reported, so as to initiate corrective measures.</p> <p>As done by the Maharashtra SERC and MPERC, Hon'ble TGERC could also consider setting up a committee with members drawn from SAC, DISCOMs and TGERC to prepare these guidelines through discussions, and if needed, field studies.</p>																																																															
4	<p>Addressing the poor financial health of DISCOMs</p> <p>As per the audited annual reports of DISCOMs and replies to given during the end of control period review for FY19-24, the financial losses of DISCOMs have been increasing over the years. Table 2 gives the details from FY19 to FY24.</p> <p>Table 2: Mounting financial losses of TG DISCOMs</p> <table><tr><th></th><th colspan="3">DISCOM Annual Loss Rs Cr</th><th colspan="3">DISCOM Cumulative Loss Rs Cr</th></tr><tr><th>FY/DISCOM</th><th>SP</th><th>NP</th><th>Total</th><th>SP</th><th>NP</th><th>Total</th></tr><tr><td>2018-29</td><td>4,967</td><td>3,051</td><td>8,019</td><td>24,362</td><td>11,858</td><td>36,220</td></tr><tr><td>2019-20</td><td>4,933</td><td>1,116</td><td>6,050</td><td>29,309</td><td>12,969</td><td>42,279</td></tr><tr><td>2020-21</td><td>4,246</td><td>2,440</td><td>6,686</td><td>33,555</td><td>15,410</td><td>48,965</td></tr><tr><td>2021-22</td><td>627</td><td>204</td><td>831</td><td>34,182</td><td>15,614</td><td>49,796</td></tr><tr><td>2022-23</td><td>8,147</td><td>2,966</td><td>11,113</td><td>42,330</td><td>18,570</td><td>60,899</td></tr><tr><td>2023-24</td><td>4,910</td><td>1,441</td><td>6,351</td><td>47,239</td><td>20,011</td><td>67,250</td></tr></table> <p>Source: Compiled by Prayas (Energy Group) from: Replies to objections on end of control period review for MYT period FY19-24, DISCOM audited annual reports</p>		DISCOM Annual Loss Rs Cr			DISCOM Cumulative Loss Rs Cr			FY/DISCOM	SP	NP	Total	SP	NP	Total	2018-29	4,967	3,051	8,019	24,362	11,858	36,220	2019-20	4,933	1,116	6,050	29,309	12,969	42,279	2020-21	4,246	2,440	6,686	33,555	15,410	48,965	2021-22	627	204	831	34,182	15,614	49,796	2022-23	8,147	2,966	11,113	42,330	18,570	60,899	2023-24	4,910	1,441	6,351	47,239	20,011	67,250	<ol style="list-style-type: none">During the year 2022-23 Rs.2,697 Cr was released by the Govt. of Telangana towards loss support under UDAY scheme for the years 2017-18 to 2020-21.Against the loss for the FY 2021-22, loss support under UDAY Scheme an amount of Rs.102 Cr was arranged by the Govt. of Telangana in the year 2022-23.Against the loss for the FY 2022-23, loss support under UDAY Scheme an amount of Rs.1498 Cr was released by the Govt. of Telangana in the year 2023-24.Against the loss for the FY 2023-24, loss support under UDAY Scheme an amount of Rs.721 Cr was released by the Govt. of Telangana in the year 2024-25.The Power Purchase Cost increased due to increase in Agriculture sales by 1,049.28 MU than the approved sales.<table><tr><td>Approved Sales</td><td>8,397.75 MU</td></tr><tr><td>Actual Sales</td><td>9,447.03 MU</td></tr><tr><td>Total</td><td>1,049.28 MU</td></tr></table>The Govt of Telangana has agreed vide letter Dt. 16.03.2023 to arrange True up amount of	Approved Sales	8,397.75 MU	Actual Sales	9,447.03 MU	Total	1,049.28 MU
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Source: Compiled by Prayas (Energy Group) from: Replies to objections on end of control period review for MYT period FY19-24, DISCOM audited annual reports

To focus on the last column (cumulative losses), it can be seen that the figures are very high and increasing. Cumulative loss of Rs. 67,250 Cr as of end FY24 is comparable to the ARR of both DISCOMs (Rs.52,007 Cr approved for FY24, Rs.65,489 Cr as per FY26 petitions).

This increase in cumulative losses is despite the high state subsidy over the years. State subsidy committed for FY25 was Rs. 11,499.52 Cr, which works out to 21% of the ARR (Clause 7.7.4 of RSTO for FY25). The subsidy request for FY26 could be as high as Rs.20,150 Cr, as per the revenue gap given in the petitions, which is about 31% of the ARR. On the other hand, as reported by the DISCOMs, total arrears (greater than Rs.50,000) of both DISCOMs as of 30/9/2024 is Rs. 30,777.66 Cr, nearly half the cumulative losses of FY24.

In the 13th Integrated Rating & Ranking of power distribution utilities by MoP (February 2025), both TG DISCOMs have rating of “C-“ compared to “C” in the 12th rating. The main reason for this appears to be the low score on financial sustainability.

DISCOMs have stated that high power purchase cost, extension of uninterrupted power supply and arrears are the reasons for these losses. We request the Hon'ble TGERC to review the financial health of DISCOMs or consider providing policy advice the state government to set up an inter-departmental committee to study the causes of such losses and suggest measures to reduce them over a period of time.

Rs. 3,045 Cr in the future years. With that the accumulated loss will come down.

7. The FCA charges for the year to be levied as per Regulation No.1 of 2023 Dt: 18.01.2023 on consumes for the year 2023-24 was Rs. 2,147 Cr was not included in the C.C. Bills as the Govt has not agreed to collect from the consumers with a view to reimburse the same to DISCOMs. If the FCA considered as revenue TGNPDCL will be in the profit of Rs.706 Cr. (i.e. Rs.2147 Cr – 1441 Cr)

5	<p>Time of the Day Tariff</p> <p>The need to study the possible revision of ToD tariff was mentioned in our submission during the previous tariff process, and as per the RST order of October 2024, DISCOMs had stated that: “<i>The Discoms will take up the change in the TOD timings in the ensuing filings to balance the demand and supply.</i>” (Section 3.19.2, RST Order dated 28/10/2024). But the current petition suggests continuation of the same ToD tariff. We request the Hon'ble TGERC to consider taking up a study to revise the ToD structure in terms of the ToD time slots, penalty/rebate, design of seasonal ToD and increasing the consumers under the ToD regime.</p>	<p>TG Discoms in the current RST ARR filings for the ensuing year have taken a collective decision as to not propose any tariff hike for retail supply tariffs. To keep this view consistent, TG DISCOMs had decided not to make any revision in TOD structure as well as it may lead to tariff hikes in an indirect manner. Revision in TOD structure may be proposed in the subsequent filings.</p>																																		
6	<p>Quality of Supply and Accidents</p> <p>We have repeatedly pointed out, that in addition to providing information in the performance reports section of the petitions, what matters is the trend of these parameters over the years, and analysis of the data to arrive at key aspects that affect the consumers. Analysis of this should provide inputs to tightening the performance benchmarks listed in the SoP Regulations such as time taken to repair failed DT, time taken to replace failed meter or address fuse off calls.</p> <p>As per REC's Consumer Service Rating report of DISCOMs, for 2023-24, TG DISCOMs have maintained rating of A just as they did in 2022-23. But as shown in the screen short given in Annexure, there is scope for improvement for Connection and Metering, Billing & Collection.</p> <p>As for electricity accidents, there are many gaps in the reporting of accidents by DISCOMs. Examples include the absence of FY23 accident data of SPDCL, absence of break-up of public/DISCOM staff/contract staff data of NPDCL, absence of cause-wise break-up of accidents (both DISCOMs) and absence of detailed root cause analysis. DISCOMs have stated that negligence by public is a major reason for accidents and listed many measures undertaken by them to reduce accidents. But as per available data, the number of fatal human accidents do not appear to be reducing. In addition, unfortunately, the</p>	<p>TGNPDCL: Year wise No. of Electrical Accidents Occurred</p> <table><tr><td></td><td colspan="3">HUMAN</td><td rowspan="2">ANI MAL</td><td rowspan="2">Gran d TOT AL</td></tr><tr><td>FY</td><td>FATAL</td><td>NON- FATA L</td><td>TOT AL</td></tr><tr><td>FY-21-22</td><td>469</td><td>70</td><td>539</td><td>1116</td><td>1655</td></tr><tr><td>FY-22-23</td><td>429</td><td>94</td><td>523</td><td>860</td><td>1382</td></tr><tr><td>FY-23-24</td><td>383</td><td>91</td><td>474</td><td>802</td><td>1273</td></tr><tr><td>FY-24-25 UPTO Feb-25</td><td>289</td><td>99</td><td>388</td><td>680</td><td>1068</td></tr></table> <p>Human Fatal Accidents Reduced by 94Nos Animal Accidents reduced by 122 Nos During the FY24-25 The following works were taken up & completed for rectification of system defects :</p> <ul style="list-style-type: none">➤ Rectification of DTR structures -28883Nos➤ 2.Rectification of DTR Earthing -22664 Nos➤ Restringing of loose lines (in spans)-31927 Nos		HUMAN			ANI MAL	Gran d TOT AL	FY	FATAL	NON- FATA L	TOT AL	FY-21-22	469	70	539	1116	1655	FY-22-23	429	94	523	860	1382	FY-23-24	383	91	474	802	1273	FY-24-25 UPTO Feb-25	289	99	388	680	1068
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	<p>DISCOMs are not providing ex-gratia to all the families of those affected by fatal accidents.</p> <p>DISCOMs had responded that root cause analysis reports are being submitted to TGERC. If so, we request the Hon'ble TGERC to make such reports public. As per the Safety Regulations of CEA, DISCOMs are expected to appoint safety officers. We request the DISCOMs to provide the status on this. Unless a concrete action plan with targets for accident reduction is prepared, there is little chance of accidents reducing in Telangana. We also request that all fatal accident cases should be provided ex-gratia on humanitarian grounds.</p>	<ul style="list-style-type: none"> ➤ Rectification of leaned poles --25925 Nos ➤ Laying of intermediate poles- 32529 Nos ➤ Replacement of Damaged/Rusted poles - 22461 ➤ Rectification of Double feeding points -3047 Nos ➤ Maintenance of HT/LT & HT/HT Line Clearances-3318 Nos ➤ Low Level Road crossings Rectification- 2506 Nos ➤ DTR Plinth Height Raising- 2274 Nos <p>*In addition to the above rectification works, Polam bata programs, pep talks and safety awareness camps were conducted in all Major Villages and farmers are being educated not to repair the DTRs by themselves and repair of motors, starters, etc. are to be done by authorized Electricians only.</p> <p>TGNPDCL Re-designated the Post of DE/Technical as DE/Technical and Safety Officer in all circles for improvement of safety to consumers and analysis of root cause of every accidents for avoidance of further accidents or re-occurrence of accidents. Further, conducting regular safety awareness camps.</p> <p>As per the directions of Hon'ble TGERC ex-gratia is being provided to all Fatal accidents</p>
7	<p>Agriculture Solar under KUSUM C and Distributed Solar plants by SHG</p> <p>The petitions mention the plan to prepare RFP and float tenders for 4000 MW of solar plants for agriculture feeder solarisation under</p>	<p>Recently an EoI for decentralized solar under PM KUSUM A was floated by the State. The same can be accessed in the below link https://pmkusum.telangana.gov.in/TS/landing.html</p>

	<p>KUSUM-C. This is a welcome step towards reducing the financial burden on DISCOM, providing quality day time power supply to agriculture pumpsets and encouraging distributed solar, which has many advantages over centralised large solar. While planning these, DISCOMs could take lessons from states like Maharashtra and Rajasthan, which are implementing such projects.</p> <p>Telangana Green energy policy mentions solar plants of 500 kW to 2 MW capacity by Women Self Help Group /Village Organisations/Farmer organisations. DISCOMs were expected to prepare plans for these. Such distributed projects have many benefits. We request DISCOMs to provide the status on these.</p>	<p>With regards to Solar Plants by Women SHG, Solar plants of capacity 64 MW are to be grounded immediately.</p> <p>Vide GO MS NO. 24 Dt: 13.11.2024 GoTG accorded sanction for 4000 MW capacity under component A during the FY 2024-25 under KUSUM-A scheme. Out of this 4000 MW, Government has decided to allocate 1000 MW to SHGs for empowerment of women community in the State.</p> <p>TGDISCOMs have submitted petition to the Hon'ble Commission seeking in-principle consent for procurement of decentralized solar power under KUSUM-A Scheme with plant size of 0.5 MW to 2 MW. The same is awaiting the approval from Hon'ble Commission as on the date.</p>
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Response to Swamy Jaganmayananda

Swamy Jaganmayananda, 4-96/2, Gandhi Chowk, Husnabad, Kodangal Mandal, Vikarabad District, Telangana – 509 350		
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	Remove the Consumer Service Centers in the State since the corruption starts at this level. Alternatively, the entire process needs to be entrusted to the Online system / Meeseva centers.	In NPDCL application only on mee seva & through NPDCL website
2	The entire power infrastructure in the state needs to be surveyed without any time intervention continuously till all infrastructure in all the districts of the state are covered and listed out village -wise.	NPDCL has digitalized all DTRs, PTRs Sub-Station and 33 KV lines and 11 KV lines are in progress through APP.
3	Each sub division should be provided with one transport vehicle for the convenience of the staff and to reach out to the places where there is any problem on priority basis. Now the farmers are transporting the DTRs at their own cost and the Government is not reimbursing the amount of transport charges. The Govt. should use its own vehicle and get the DTR repaired.	Utility vans are available in every operation Sub-Division
4	The DTR platform is being constructed by the farmers at their own cost and it is not being reimbursed to them. The Govt. should arrange to construct the platform and erect DTR at its cost through the contractor as per their procedure in time as per the need and requirement of the farmers.	DTR plinths are constructing by NPDCL through contract agency.
5	Once the power Meter is dismantled, no charges from the consumer shall be collected.	After dismantlement, no charges are levied except delayed payment surcharge on amount outstanding before the date of dismantlement.
6	The consumer needs to be informed about the total amount to be paid for AGL connection before serving the estimated cost. otherwise it will create unnecessary problems to the consumer. Due problems related to this there are about 4000 DTRs not released for the last 3-4 years.	It is to inform that, it is only possible to know the amount to be paid by consumer after creation of estimate and after sanctioned. Further it is already informing to consumer through message that the amount to be paid by the consumer in the form of ORC(i.e., Demand Notice) after deducting the subsidy amount from the estimate including sketch, Demand notice, List of materials in telugu.
7	No proper staff at Sub Division and Division level. The available staff is as follows:	Not Pertains to TGNPDCL.

	<table><tr><th rowspan="2">Sl. No.</th><th rowspan="2">Mandal</th><th colspan="7">Staff Vacancies</th></tr><tr><th>AE</th><th>Sub Egr.</th><th>LI</th><th>LM</th><th>ALM</th><th>JLM</th><th>Total</th></tr><tr><td>1</td><td>Kodangal</td><td>1</td><td>1</td><td>2</td><td>1</td><td>5</td><td>0</td><td>10</td></tr><tr><td>2</td><td>Bomraspet</td><td>0</td><td>1</td><td>2</td><td>2</td><td>4</td><td>3</td><td>12</td></tr><tr><td>3</td><td>Doulatabad</td><td>1</td><td>1</td><td>1</td><td>1</td><td>0</td><td>2</td><td>6</td></tr><tr><td>4</td><td>Duddyal</td><td>0</td><td>0</td><td>2</td><td>1</td><td>0</td><td>0</td><td>3</td></tr><tr><td></td><td>Total</td><td>2</td><td>3</td><td>7</td><td>5</td><td>9</td><td>5</td><td>31</td></tr></table> <p>There should be at least 20 AEs in Tandur Sub Division. There are no AEs in Tandur Division. How can the sub division be managed? The existing staff is only doing the work of collecting the bill amounts. This needs to be increased to JLM, LM, and CL for each village in each sub division and vacancies as given here under should be filled up.</p>	Sl. No.	Mandal	Staff Vacancies							AE	Sub Egr.	LI	LM	ALM	JLM	Total	1	Kodangal	1	1	2	1	5	0	10	2	Bomraspet	0	1	2	2	4	3	12	3	Doulatabad	1	1	1	1	0	2	6	4	Duddyal	0	0	2	1	0	0	3		Total	2	3	7	5	9	5	31	
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8	our request for separate lines for AGL transformers and Domestic Transformers from sub-stations is not completed till date. Its more than one year since we gave a representation in this regard. It should be completed at the earliest to avoid inconvenient to the villages.	NPDCL has proposed in RDSS Scheme.																																																													
9	A substation was sanctioned for Husnabad Village 9 years back, but no work has done on thar till date.	Not Pertains to TGNPDCL.																																																													
10	we have to complain every time to the Director/CGM for smaller and big issue then only the works are being done. No officer at the circle, Division, and Sub-division level are responding to our request for solving the problems. Hence, clear instruction should be given to them for attending the problems at their concerned level so that we need not approach you for all and sundry issues from time to time.	Not Pertains to TGNPDCL.																																																													
11	It is observed many a times that the ADE, AE, DE are closing the work books indicting that the contractor has completed the works and contract amount is being released to them. The contractors are not given the complete material for completion of the work. Since the works are not completed as per the estimated work due not providing sufficient material the contractor would complete based on the material given to him.	Not Pertains to TGNPDCL.																																																													
12	There is problem in stores management. When there is a transformer in the stores there will not be AB Switch and when there is Conductor there will not matching material etc. This leads to delay in erection of DTR and giving rise to other problems. Therefore. it is suggested that: a. Each District should be having Stores for supply of material. There are no stores for all the new districts.	a. All major materials such as DTRs, conductors, AB Switches are maintained as per field requirement and matching material stock is maintained to meet 4 to 5 months consumption in all 6 stores of TGNPDCL jurisdiction. The material supply is well																																																													

	<p>b. The entire Stores Management systems has to be computerized.</p> <p>c. All the people concerned - ADE, DE and other related officers should be able access the information about the material available in the stores so that the needy officers will be able to indent for their required material from their Section/Sub-Division only without visiting the stores office.</p> <p>d. The Stores incharge should be able to supply the indented material to the needy office/Section/ Sub-Division.</p> <p>e. On receipt of the material, the office/Section/Sub-Division should be submitting utilization certificate etc., of the material to the Stores for accounting purpose.</p> <p>The above computerization if implemented will bring transparency in the stores management and check any possible corruption in this area which is now happening.</p>	<p>managed with these 6 nos. stores in TGNPDCL area.</p> <p>b. Entire store management is online and monitored through SAP System.</p> <p>c. SAP system is accessible to all field AEs/ADEs/DEs and above cadre officials for monitoring the material availability and booking. E-stores facility for online booking of materials by field AEs is made available in TGNPDCL area.</p> <p>d. The stores incharge is authorized to supply the material indent (proper requisition) raised by various Section officers through SAP.</p> <p>e. After receipt of the material from the stores to various sections/sub-divisions, the work orders will be closed only after submitting all the material drawn by the Section Officer/Sub division officers with relevant sketches and pole schedules.</p>
13	The facility for uploading a photograph of the Transformer / transmission line etc., which is / are not working with longitude and latitude positions in the TSSPDCL APP should be provided so that the concerned officials will be able act upon that immediately and resolve the issue.	Not Pertains to TGNPDCL.
14	When a Consumer submits a DD for a DTR sanction the Consumer APP should show the estimation for the DTR work required. E.g. 11 kv line per km amount, LT line km total amount DTR capacity kva total amount. Grand total amount. This will avoid harassments by the Department in getting the estimation and making payment and also avoids scope for corruption.	Estimate is prepared on the basis of actual material required, not on the basis of length of line. Each material cost already displaying in estimate and sum of cost of materials is nothing but estimate cost. The same was already informing to consumer through message that the amount to be paid in the form of ORC(i.e., Demand Notice) after deducting the subsidy amount from the estimate including sketch, Demand notice, List of materials in telugu.
15	we have also asked the information about AB Switch & SG RTI Set through an RTI letter to the corporation PRO. But we didn't get the proper information to us.	Not Pertains to TGNPDCL.
16	Provide one van for each transformer Repair Centre so that the transformers are easily transported to the centre and repair and back erection. Absence of this causing lot of hardship to the farmers and they have to incur rot expenses for transportation of the DTR.	NPDCL has provided every sub division with 2 MT utility van in addition to the every division has 3 MT pick up vans.

17	Please look into the works of Palle pragathi and Pattana pragathi works done so far. Specifically in agriculture no work has been done so far till date.	NPDCL has rectified all identified defects during polam bata and remaining will be take up all rectification works in AGL field after harvesting crops.
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Response to D. Thirupathaiah

D. Thirupathaiah, State General Secretary, Human Rights Forum (HRF), Human Rights Forum (HRF), Telangana State Committee		
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	In many villages of Telangana the transformers are not properly fenced to protect from electrocution. As a result, there are accidents to the tune of loss of life.	In public floating area NPDCL has provided fencing to all identified locations and taken all safety measurements by height raising of plinths.
2	In many villages the electric supply live wires are not properly fitted and find hanging in the fields and beside the village roads. Recently three persons died in Nizamabad District, as they came in contact with hanging live wire in an agricultural field (Our fact finding report is separately submitted)	Rectification of lines is a continuous process in TGNPDCL. It is being reviewed every month by Hon'ble Chairman & Managing Director. Restraining of loose line, erection of middle poles is a part of maintenance works. In case of Nizamabad as per the statement of owner of agriculture field where the accident of 3 persons taken place the AB Cable was at reasonable height from the ground, not laying at low level on previous day which was observed while he was spraying the pesticides in his field.
3	The Distribution system in the villages is very chaotic with low/high voltage fluctuations.	Rectification works taken under PSI Scheme in every Circle.
4	Earlier BRS Government announced free electricity, to Dhobi and Barber communities, who are running small establishments. Now the field level Bill Collectors are pestering these communities to pay bills. They say, it appears, that the Govt. is not paying to the Board, reimbursed amounts.	The said Schemes are continued.

Response to Dr. Narasimha Reddy Donthi

Dr. Narasimha Reddy Donthi, Email: nreddy.donthi22@gmail.com		
S.No.	Summary of Objections / Suggestions	Response of the Licensee
Specific Suggestions		
1	Revamp Annual Revenue Requirement process to simplify and standardize.	Objectors point is noted and welcome. The Licensee will abide by the decision and directions of the Hon'ble Commission in this regard.
2	DISCOMs and other agencies should upload their ARR business plans, along with excel sheets. This kind of data sharing helps in analyzing, monitoring and providing proper inputs on time.	The Licensee has submitted the requisite ARR filings and the required excel formats for the current submission to the Hon'ble Commission. The same is available in the TGERC website.
3	Generating capacity is become 'excess' simply because DISCOMs feel market purchases are cheaper. CMD has been quoted in media for saving money by resorting to 'external' purchases. TGERC needs to unravel this.	For the estimation of power purchase in the ARR filings, the Licensee has projected hourly demand in MW basis and estimates the power procurement required based on MW matching for the respective hourly blocks based on available generation capacities. In some instances, where available generation capacities are unable to meet the projected MW demand, the Licensee procures short-term purchases from the market to meet the shortfall. However during the course of the year, Telangana state is pursuing market purchases in cases where the market prices are lower than the VC in order to further optimize the power purchase cost which will ultimately benefit the end consumer. The licensee does not consider this methodology for the ARR filing as it is not possible to project real-time market prices.
4	A big contribution is the government subsidy for agriculture into electricity sector. This is based on agricultural consumption. For this reason, proper, verifiable estimation of agricultural consumption is required. Scientific methods can be adopted to improve the estimations of agricultural consumption.	The Licensee had previously invited the Indian Statistical Institute (ISI) for studying methodology for the estimation of agricultural sales and ISI had recommended stratified random sampling methodology for estimating agricultural sales.
5	Prayas recommendation for setting up an inter-departmental committee to study the causes of DISCOM losses and suggest	The Licensee will abide by the directions of the Hon'ble Commission in this regard.

	measures to reduce them over a period of time. SAC can also take a parallel study.	
6	In Telangana, quality of supply and resultant accidents need serious focus.	The defects available in distribution network i.e., leaned poles, damaged poles, loose lines, low clearance, road crossings, low transformer plinths etc., are being identifying in the field and its rectification is being taken up duly procuring men and materials, to avoid electrical accidents. From the above the accidents were reduced by 16% over on the year.
Comments on Telangana Clean and Green Energy Policy 2024		
1	It does not assess how and why clean energy is required within Telangana. Outlining why this policy is necessary and its intended outcome is a primary step in policy formulation. In the absence of such a background to this policy, an clear, measurable objective of reducing emissions, natural resource conservation and sustainability is missing.	Analyzing the need for the policy and defining its objectives were the inception for crafting a comprehensive energy policy. During the stakeholder meeting on January 3, 2025, stakeholders were briefed about the outlined need for a clean energy policy within Telangana. Various stakeholders from the energy sector across India participated in this meeting where the necessity for such a policy was shown and discussed. The reasons for the policy's importance, which were presented and discussed during the meeting, include: 1) The previous solar policy had expired in 2020, and there was a lack of dedicated policies for other renewable energy (RE) sources such as wind, pumped storage, and other forms of RE, as well as for RE manufacturing including Green Hydrogen & Biofuels. 2) To address the growing energy demand within Telangana. 3) To fulfill the Renewable Purchase Obligation. 4) To address the intermittency of renewable energy sources through the utilization of storage technologies.

		<p>5) To support the production of Green Hydrogen and its derivatives.</p> <p>Analyzing the necessity for the policy and defining its objectives were the foundation for formulating a comprehensive energy policy</p>
2	This policy is silent on human resources, financial, legal, safety and operational aspects.	<p>During the stakeholder meeting held on January 3, 2025, details were shared regarding potential investments and the projected job opportunities to be generated in the state over the next 10 years through the implementation of this policy. This information was also disseminated to the public through various media channels. Some references to these announcements can be found in the following sources:</p> <p>1) https://timesofindia.indiatimes.com/city/hyderabad/t-green-energy-policy-aims-at-rs-2-lakh-cr-investments-1l-jobs/articleshow/116972577.cms</p> <p>2) https://www.newindianexpress.com/states/tehangana/2025/Jan/06/tehangana-clean-and-green-energy-policy-unveiled</p> <p>3) https://ntvtelugu.com/news/tehangana-cabinet-approves-clean-and-green-energy-policy-2025-737142.html</p> <p>In addressing the operational aspects of the policy, details were provided regarding the nodal agency responsible for implementation, the duration of policy operation, and other pertinent information.</p> <p>Safety aspects encompassing various aspects within the energy policy will adhere to the existing Standards of Performance (SOP) and other safety regulations mandated by the government. Since these safety measures align with established guidelines, they are not explicitly detailed separately within the policy.</p>

		Any more information required by developers regarding the Telangana Clean and Green Energy Policy will be given by nodal agency from time to time based on necessity.
3	Overall, this policy has taken the form of a scheme than a policy. It has lot of gaps, because of under-assessment of resources, opportunities, barriers and strategies.	The Telangana clean and green energy policy, unveiled on January 11, 2025, followed extensive consultations with relevant departments within the state and stakeholders nationwide. The policy launch included the revelation of anticipated opportunities, projected investments, and other pertinent details to the public. Emphasizing its adaptability, the policy explicitly states, "The policy may be reviewed from time to time in view of any changing requirements." This proactive approach ensures that the policy remains responsive to evolving needs, with continuous updates and additional information being shared by the designated nodal agency as necessary.
4	There are several factors such as social, economic, environmental, ecological, technological and scientific aspects to this policy. There is no assessment of the interplay between these factors.	Extensive deliberation was dedicated to multiple facets encompassing social, economic, environmental, ecological, technological, and scientific dimensions within the framework of the clean and green energy policy. Considerations were made regarding various elements, including carbon emissions reduction, the provision of supplementary incentives to support women and minorities, the promotion of innovative technologies, the enhancement of workforce skills through upskilling initiatives, the facilitation of economic advancement by attracting investments to the state, and the commitment to driving technological advancements within the energy sector. These aspects were explicitly addressed in the policy document.
5	Each of the alternatives have a different set of challenges - hydrogen remains unproven, BESS is expensive, RE has low PLF and day time supply limitations, vehicle fuels have distribution issues, PSP, WTE have environmental issues, etc.	The selection of renewable technologies considers the diverse challenges posed by each option. Suggested Renewable energy mix is proposed after assessing the state's potential in maximizing the

		energy output from Renewables. In maximizing the energy output, Telangana strategically capitalizes on its significant solar and wind potential. The state aims to enhance capacity utilization by harnessing its abundant solar and wind resources, with surplus energy being channeled through battery storage solutions for efficient management. Each technology's merits and demerits will be scrutinized based on individual project requirements to guide informed decision-making and advance sustainable energy development initiatives.
6	This policy is not SMART - Specific, Measurable, Achievable, Relevant and Timely - fully, even though traces of these criteria can be found here and there.	The policy has clear and specific objectives that can be measured, achieved, and are relevant. The targets for capacities by FY 30 and FY 35 are technology-wise and have set timelines, showing that the policy is designed with achievable and timely objectives in mind. The policy overall aligns with the principles of being SMART.

7	<p>Telangana has to evolve a policy that aims to provide households, manufacturing and businesses with a secure, sustainable, competitive, and affordable energy supply, with a focus on diversifying energy sources, improving energy efficiency, and promoting research and innovation in low-carbon and clean energy technologies.</p> <p>In fact, Clean and Green energy policy can be a set of policies and regulations to help the transition in Telangana towards a low-carbon economy, including measures to promote energy efficiency, increase the use of renewable energy, and improve the functioning of the internal energy market.</p>	<p>The current Energy policy in Telangana strategically plans for capacity additions aligned with anticipated state demand. By diversifying energy sources and maximizing renewable energy utilization, the policy ensures a secure, sustainable, and affordable energy supply that caters to evolving needs. This demand-focused strategy underscores the commitment to delivering reliable energy solutions.</p> <p>Furthermore, to drive research and innovation for improved energy efficiency, the state government is dedicated to establishing an incubation center. This facility will collaborate with startups, academia, research institutions, and energy industry players to identify and scale up inventive solutions and products in the clean energy sector. Such initiatives not only foster a culture of innovation but also contribute to enhancing energy efficiency and promoting the adoption of low-carbon technologies in the state.</p>
9	There is no visible and tangible prioritisation between different sources of energy	The proposed renewable energy mix in Telangana has been carefully crafted by evaluating the state's capacity to optimize energy output from renewables. By outlining target capacity additions for FY 30 and FY 35, the policy underscores a prioritization strategy.
10	Biofuels seem to be ignored for whatever reason, not that is good and recommendable. But there are already biofuel units in Telangana.	Clear guidelines pertaining to development of biofuels in the state are provided in the clause 13 of the Telangana clean and green energy policy released vide G.O.Ms No 02 dated 11.01.2025. The same can be accessed through the following link https://tgredco.telangana.gov.in/Updates_2025/Telangana_Clean_and_Green_Energy_Policy_2025.pdf
11	Land for solar and other RE projects is a major issue. In the absence of a land use policy, trade-offs between different purposes of land use can be detrimental to environment, ecology and food security.	Land usage as mentioned in this query will be as per existing state guidelines and any revisions thereof will be adequately published prior to adoption
12	Resources for this policy, especially the investment from both government and private sources has not been quantified.	Resources for this policy are quantified in terms of capacity additions targeted for FY30 and FY35. With

		<p>the mentioned target capacity additions potential investments over next 10 years is projected and same has been shared through various media channels. Some references to these announcements can be found in the following sources:</p> <p>1) https://timesofindia.indiatimes.com/city/hyderabad/t-green-energy-policy-aims-at-rs-2-lakh-cr-investments-1l-jobs/articleshow/116972577.cms</p> <p>2) https://www.newindianexpress.com/states/tehangana/2025/Jan/06/tehangana-clean-and-green-energy-policy-unveiled</p> <p>3) https://ntvtelugu.com/news/tehangana-cabinet-approves-clean-and-green-energy-policy-2025-737142.html</p>
13	<p>Employment potential of this policy needs assessment. Since new technologies are on the anvil, training, skilling and capacity building activities have to be integrated into the policy. Transition includes rehabilitation of job losses as well, which has to prioritized.</p>	<p>During the stakeholder meeting held on January 3, 2025, details were shared regarding projected job opportunities to be generated in the state over the next 10 years through the implementation of this policy. This information was also disseminated to the public through various media channels. Some references to these announcements can be found in the following sources:</p> <p>1) https://timesofindia.indiatimes.com/city/hyderabad/t-green-energy-policy-aims-at-rs-2-lakh-cr-investments-1l-jobs/articleshow/116972577.cms</p> <p>2) https://www.newindianexpress.com/states/tehangana/2025/Jan/06/tehangana-clean-and-green-energy-policy-unveiled</p> <p>3) https://ntvtelugu.com/news/tehangana-cabinet-approves-clean-and-green-energy-policy-2025-737142.html</p>

		To encourage capacity building and upskilling the state government is dedicated to establishing an incubation center. This facility will collaborate with startups, academia, research institutions, and energy industry players to identify and scale up inventive solutions and products in the clean energy sector.
14	Energy use sectors, industries, urban residential and agriculture, need to be integrated into policy objectives	The target capacity has been determined by considering all the energy use sectors and their expected usage for the next 10 years. The first two objectives i.e., Ensure energy security for Telangana and Provide reliable and affordable power have been added considering energy use sectors.
15	Barriers to achieve the targets have not been identified distinctly.	Barriers are not called out explicitly in the policy. Effort has been made and incentives are crafted to overcome the barriers.
16	Floating solar projects compete with and impede other needs/ environmental services of the water bodies.	Floating solar projects under this policy will be undertaken as per the relevant norms in force.
17	The economics of roof top solar projects need to be established. Within the solar photovoltaics, cost of installing the systems at different locations , farms, wastelands, waterbodies, building tops, etc., can be a determining factor.	As technology improves, the costs for the various technologies are expected to decrease, outlined costs of installing the systems might not be relevant over the applicability period (10 years) of the policy.
18	A regulatory instrument for solar projects, particularly roof top, needs to be developed.	The current policy framework already includes a project monitoring committee tasked with overseeing various aspects of renewable energy projects, including rooftop solar projects. This committee comprises members responsible for monitoring feasibility studies, project implementation, and procurement status to meet Renewable Purchase Obligation (RPO) targets as outlined in the policy.
19	Energy transition in this policy is not geared to converting existing convention energy production to RE or clean energy, but rather new capacity addition being focused on RE. For example, Telangana has a total contracted capacity of 25 GW, out of which thermal is 14 GW. As per the policy, by 2034-35, thermal would be 17 GW, 3 GW above the current capacity. This is not reduction.	The policy aims to deliver clean and green power in an optimal manner to the consumers at an affordable cost. The State GENCO and the Central Generating Plants and IPPs are making efforts in meeting the norms prescribed in the regulations with regards to efficiencies and emissions. The Policy aims to

	There is no retirement. On the other hand, overall contracted capacity is envisaged to increase from 25 GW to 66 GW.	improve the position of RE within the generation mix to ensure that majority of the power generated is through clean renewable sources.
20	Emissions from 14 GW coal-based energy (thennal) would increase to 17 GW in the next 10 years. an average coal power plant emits about 1 tonne of CO2 per megawatthour (MWh). This is not clean energy transition, simply because there is no reduction, but increase in coal-based energy.	
21	Electricity production is planned to increase to 66 GW, from 25 GW. Emission potential of the targeted energy capacity needs assessment and can be one of the parameters of transition to clean energy. Basically, an emission reduction index should be developed to plan and map emissions reduction.	State's carbon intensity (carbon emissions in process of energy generation) was assessed and the findings from this assessment have been shared with public. Reference - https://www.thehindu.com/news/national/telangana/s-tate-aims-to-attract-198-lakh-crore-investment-114-l-jobs-in-10-years-with-green-energy-policy/article69065421.ece
22	This growth of 41 GW in the next 10 years is most probably based on electricity demand assessment. How does this new 41 GW gets integrated into the current electricity usage pattern given the barriers in the form of merit order dispatch, fixed charges, RPOs, etc.?	Telangana is in a unique situation wherein the state provides 24x7 free supply to agricultural consumers. The policy envisages integration of RE capacities to support the state in meeting peak electrical demand growth. Further, the policy also includes incentives for BESS and PSP, to support the integration of RE and to ensure zero RE curtailment.
23	Impact on aquatic diversity due to Pumped Storage Projects (PSP) and floating RE needs to be assessed too, given the potential for increase in temperature, habitat destruction, species displacement and altered food webs. Pumped storage hydropower (PSH) plants can have significant effects on aquatic diversity, both upstream and downstream of the reservoir.	The different projects under this policy will be undertaken as per the relevant norms in force.
24	Deployment Floating solar panels (FPV) in water bodies raises concerns about potential impacts on aquatic diversity . Key impacts include shading and photosynthesis (cascading effects on water quality and aquatic life), water quality changes (reduction in sunlight can alter temperature stratification and oxygen levels, impacting aquatic flora and fauna), materials and durability (degrade over time,	The different projects under this policy will be undertaken as per the relevant norms in force.

	potentially leaching harmful substances into the water), installation and maintenance (disrupt local water bodies through increased boat traffic, potential leakage of lubricants or fuels, and other mechanical disturbances).	
25	This policy needs to come up with an estimated capital expenditure on Renewable energy sources	The policy is expected to attract investments worth INR 1.98 Lakh crores. Further, the estimated capital expenditure is not disclosed as 1) As technology improves, the capex requirements for the various technologies are expected to decrease, and 2) disclosure of capex might skew developer bids which will impair competitive price discovery. Further, we expect the developer to innovative and bring in the possible technology will reduce the tariff burden on the end consumers.
26	Energy finance discussion is not here. Financial commitments provide authenticity to the government obligations enunciated under this policy.	Financial incentives mentioned in the policy play a pivotal role in this framework, providing developers with the necessary support and motivation to undertake renewable energy projects. These incentives serve as a mechanism to reward successful project completion within set timelines, reinforcing the government's dedication to fostering a conducive environment for renewable energy development and adoption.
27	This policy is mostly tuned towards replacing fuels - fuel transition - not energy transition per se. The focus is more on vehicle electrification and transport fuel energy, including hydrogen, BESS, energy charging stations, etc.	The Telangana Clean and Green Energy Policy 2025 is developed as an overarching policy covering energy transition with the aim of replacing fossil fuel based generation with renewable sources. The policy also covers aspects such as EV charging stations (for transport electrification), BESS (for RE integration related grid stability), and green hydrogen which is also relevant to energy transition.
28	A National Energy transition programme has to be worked out in consultation with State governments. A National Energy Transition Council may be established to bring about a consultative and shared programme of transition.	Presently, MNRE is the nodal Ministry of the Government of India for all matters related to new and renewable energy. The Hon'ble Commission is requested to take a view in this regard.

29	This policy needs a provision of periodic performance review and evaluation and to ensure linkage with related central government guidelines/ directions. There is a mention of review, but it is couched in vague terms.	The policy envisions the constitution of a Project Monitoring Committee to monitor the progress of feasibility studies, implementation of RE projects, etc. The exact modalities of performance review is expected to vary on case-to-case and project-to-project basis and will be decided by the committee.
30	Expand the Project Monitoring Committee to include experts from academic and research institutions. Further, this Committee can be transformed into a Telangana Energy Transition Council. This Council can help in interdepartmental coordination and also integrate all aspects of energy transition as policy making body.	It is envisioned that the Project Monitoring Committee will refer matters of importance to subject matter experts on a case-by-case and project-by-project basis. The Objectors point regarding Telangana Energy Transition Council for interdepartmental coordination is noted.
31	A Stakeholder Committee , to operate under and guide the Project Monitoring Committee can be helpful.	The different projects under this policy will be undertaken as per the relevant norms in force.
32	Telangana needs an institutional review towards energy transition. Current governance mechanisms, largely controlled by Department of Energy are inadequate in planning and implementing an Energy Transition programme, across different sectors.	The Telangana Clean and Green Energy Policy 2025 has been developed towards accomplishing energy transition in the state across different sectors.
33	Government should commission studies by academic institutions on each of identified RE energy sources, their potential, economics and feasibility. Without a technoeconomic feasibility assessment, providing subsidies in general cannot be construed as SMART programme.	Feasibility studies for each renewable energy project will be conducted on a case-by-case basis, tailored to project requirements. By employing a customized approach to project assessment, the state can make well-informed decisions that enhance the overall efficiency and effectiveness of renewable energy initiatives.
34	A research component in the policy is a must. This policy does not refer to any prior, parallel research into all related aspects. To cite, establishing minimum requirements or benchmarks for specific behaviors, processes, or outcomes can be possibly through research and development. Technical standards, dovetailed into subsidies and financial components, can be helpful in realizing the envisaged progress.	The state government is committed to driving innovation in renewable energy sector for sustainable technologies. To enable this, an incubation center will be set-up. The incubation center will work closely with start-ups, academia, research institutions, industries in energy sector to identify and scale up new solutions, products, business models etc. An INR 50 crore incubation fund will be created to support promising ideas & start-ups in this domain.
35	Scalability, cost competitiveness, economies of scale, technological advancements, etc. , are important elements that need	These factors mentioned in the query are dynamic and can vary depending on the project's specifics,

	to be addressed, when grounding a RE technology. Out of the assessment of these parameters, supportive policies and frameworks to encourage the development and adoption of appropriate RE technologies can emerge.	including location, technology choice, and capacity requirements. Detailed analysis encompassing these key parameters will be presented during initial stages of project.
36	A grievance redressal mechanism needs to be integrated into the institutional structure, given the criticality of subsidies, prioritization, timelines and scheme-led transition.	Nodal agencies for implementation has already been identified and mentioned in the policy. Grievance redressal if any will be under the purview of the identified nodal agencies.
37	Concepts have not been defined. For example, it does not define clean energy and green energy. There is no information on what distributed RE means, distinct from solar projects.	New concepts introduced in the policy has been defined in the Definitions section of the policy.
38	This policy framework is similar, if not exact, to the AP policy. Elements that are distinct to Telangana need to be identified and highlighted.	This policy has been specifically developed keeping in mind the strengths, resource availability, and targets of Telangana state. However, in order to be competitive, detailed comparison with similar policies of other states such as Karnataka, Andhra Pradesh, Rajasthan, Madhya Pradesh, etc. was also undertaken.
39	This policy overly simplifies some of the mechanisms enunciated for promoting private investment, such as allocation of water bodies for floating solar voltaics.	The policy in question and incentives have been developed as method for improving private sector participation in the state. The finer details as mentioned in this query will be as per existing state guidelines and any revisions thereof will be adequately published prior to adoption.
40	This policy in fact is a set of existing schemes or approaches or statements made recently. There is nothing new.	This policy has been developed in coherence with existing / previous policies including but not limited to Telangana Solar Policy 2015, Telangana Food Processing and Preservation Policy, Telangana Industrial Policy, Telangana Electronics Policy etc. Further, new technological advances, and the aspiration of the state has also been incorporated.
41	This policy does not include Roof top solar policy for domestic and commercial consumers. There is no reference to solar energy policy for agriculture.	The policy covers incentives for promoting rooftop solarization for households.
42	Some of the potential figures for various RE, especially wind energy, is surprising. These figures seem to come out of the blue.	The potential for various RE sources mentioned in the Telangana Clean and Green Energy Policy 2025 are

		as per Resource Adequacy study performed by CEA for Telangana state. Further, wind energy potential in Telangana was estimated to be 54.7 GW at 150 m hub height as per MNRE.
43	This policy does not address the current 'burdens' on Telangana electricity financial system , especially in the form of fixed charges, market purchases, loans, debts, project overrun costs, etc., which keep popping up at odd places whenever a policy decision is taken.	The focus of this policy is the promotion of renewable energy in the state.
44	Per unit of RE electricity , or any other forms discussed in this policy, on user sectors like agriculture, manufacturing, transport, residential and commercial, needs to be worked out.	The policy aims to procure clean renewable energy in an optimal manner at an affordable cost to the consumer with the intent of fully utilizing the available resources in the state. The further apportioning of the per unit electricity prices will be undertaken by the DISCOMs based on cost of power as well as other cost components.
45	Emissions from suggested alternatives such as Waste to Energy are major concern too for environment and economy.	Waste to energy suggests a method to tackle the increasing amounts of solid wastes in the state. The objectors point is noted however, Waste-to-energy is seen to be a better alternative to landfill and dumping.

Response to Rajkiran Bilolikar

Rajkiran Bilolikar, Administrative Staff College of India, Bella Vista, Raj Bhavan Road, Hyderabad – 500 082, Email: rajkiran@asci.org.in		
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	No tariff increase is proposed for FY 2025-26. DISCOMs may explain how the entire revenue requirement / revenue gap for FY 2025-26 is proposed to be met. Has the State Govt. consented to provide the entire revenue gap of the DISCOMs for FY 2025-26 through tariff subsidy. If not, need to be ascertained.	The DISCOMs have proposed that the entire revenue gap of INR 20,151 Crores will be met through tariff subsidies from the Government of Telangana.
2	Surplus power capacity available: DISCOMs projected Rs. 1.6 per unit towards realization of surplus power. However, the variable cost say from Yadadri, is more than Rs. 3. DISCOMs are not clear in their submission above better power management. Measures taken/to be taken for cost neutral power surrendered/power under-drawal	The surplus power is projected to be sold in the market at an average price of INR 5.56 / unit (based on CY2023 actuals data). The projected INR 1.6 / unit is the net income to the Licensee based on market price and the variable cost of the various stations.
3	CESS has projected power purchase cost of Rs. 4.77 / kWh. The average power purchase cost of DISCOMs is Rs. 6.01 / kWh in FY 2025-26. Sale of power to CESS, Sircilla can be considered at least to recover the Average Power Purchase Cost (APPC) of the DISCOMs.	Noted.
4	Both the DISCOMs are silent on Energy Efficiency, Demand Side Management and PAT benefits.	<p>Energy Conservation measures taken up by TGNPDCL</p> <p>Replacement of Conventional lamps with LED bulbs:</p> <p>a. Gram UJALA: 205042 LED bulbs are distributed to domestic consumers by TGNPDCL, in addition to 185660 LED bulbs under DDUGJY Scheme with a total of 390702 Nos LED bulbs, thereby saving 19.9 MW which was predominant during evening peak load hours.</p> <p>b. Municipal EE Measures: After formation of Telangana from June-2014, all incandescent bulbs and tube lights of street lights of 46 Nos Municipalities in TGNPDCL have been replaced with 119602 LED bulbs in TGNPDCL.</p>

		<p>c. Streetlights National Programme: 116375 Nos existing incandescent lamps and tube lights have been replaced in all Gram panchayats in TGNPDCL.</p> <p>d. Providing Street light phase: 12988 KM street light phase 3rd and 5th wire (Cost of Rs.47 crores) was erected by TGNPDCL in Gram panchayats and Municipalities with TGNPDCL's funds to avoid glowing of street lights during day time.</p> <p>e. In TGNPDCL Offices: The conventional tube lights & SV lamps are being replaced with LED bulbs at offices, 33/11KV Sub Stations of TGNPDCL.</p> <p>f. Fixing of 2/3KVAR LT Capacitors:</p> <ul style="list-style-type: none"> • New AGL services are being released in TGNPDCL only after providing necessary infrastructure i.e LT lines, 11KV lines and Distribution Transformers and also by ensuring fixing of 2/3KVAR capacitor at consumer AGL pump sets. • Special drive is also being conducted for fixing of 2/3KVAR capacitors at Agl. pump sets where ever they are not available for reactive power compensation and efficient utilization of AGL pump sets. <p>DSM Measures:</p> <ul style="list-style-type: none"> • TGNPDCL entered an MoU with M/s.EESL on Dt: 09.07.2024 for implementation of DSM measures. As per the MoU, M/s.EESL will support the proposed DSM program through bringing in the necessary investments and technology required for providing the consumers of TGNPDCL with energy efficient appliances and equipments like Super Efficient Air Conditioners, IE3 Motors, BLDC fans etc.,
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		<ul style="list-style-type: none"> • Despite of revenue loss to the company by utilisation of Energy efficient appliances, NPDCL bounded for implementation of DSM measures in coordination with M/S.EESL as per MoU. • TGNPDCL installed 1610 No.s 2/1MVAR capacitor banks for improvement of power factor and reduction of losses. The performance of these capacitor banks are being monitored daily from Corp. Office. • 573 No.s 600KVAR Capacitor banks are erected on max load 11KV feeders for reduction of load and line losses. <p>PAT Benefits:</p> <ul style="list-style-type: none"> • Bureau of Energy Efficiency designated TSNPDCL as designated consumer under PAT Cycle-II and notified vide statutory order No. 3542(E) dated 29.12.2015. • Under PAT Cycle-II, the base year is 2014-15. The period of PAT cycle-II is from FY 2016-17 to 2018-19 and the target year is 2018-19 • Bureau of Energy Efficiency has notified base line loss for the year 2014-15 as 13.32%. • Targets for losses were notified initially as 12.87% and later amended in concurrence with UDAY targets as 10% for the financial year 2018-19. • The loss percentage including EHT during target year i.e., 2018-19 is 9.90% against the target of 10%. The energy savings achieved is 12.80 MU i.e,1100.972 Toe (Tons of oil equivalent). • One Toe =11628 KWH • The M&V Auditor certified the energy losses and recommended eligibility of 1101 Nos. Energy Saving Certificates. • Trading of Escerts is being done in IEX/HPE exchangers in coordinates with Executive Director/Commercial/TSPCC/HYD and only 332 no's ESCerts are traded with an amount of Rs. 6,31,030/-.
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5	Both the DISCOMs are silent on prepaid smart metering implementation in the State to reduce losses and prompt recovery of revenue for sale of power.	<ul style="list-style-type: none"> • In GO MS No.1, Dt: 03.01.2016, Energy (Budget) Department, Govt. of Telangana, it was decided that all Govt. Departments should have prepaid meters at their own cost w.e.f 1st April,2016. • As per the above GO, TGNPDCL purchased 18812 prepaid meters for installation of meters to Govt. services and 15035 meters are fixed till now. Present all meters are in Post paid mode only. The project was closed in the month of July-2023. • At present, TGNPDCL is not procuring the prepaid meters.
6	Both the DISCOMs are silent on Planning elimination of Cross-Subsidy within the same consumers category and other category of consumers. At least commercial category may be considered for better business growth in the state.	Based on the consumer mix, cost of service, and the tariffs, the Licensee will strive to reduce the Cross-Subsidy Surcharge in line with the provisions of the National Tariff Policy 2016.
7 a)	<p><u>Grid Support Charges:</u> DISCOMs have proposed Grid Support Charges at Rs. 20.04 per kW per month applicable to Co-located and non co-located captive power plants, IPPs and generators having partial PPAs with the licensee over and above PP capacity.</p> <p>The commission vide order O.P. Nos. 80 & 81 of 2022 dated 27.03.2024 directed the licensee to calculate Grid Support Charges as per Clause 4.1.13. The excerpt of clause is shown below</p> <p><i>“At this stage, when the Retail Supply Tariffs are already fixed for FY 2023-24 and the Financial Year is at the far end, the commission is not willing to determine GSC for FY 2023-24 and directs TSDICOMS to file a separate petition for determination of GSC for FY 2024-25 onwards duly following the methodology approved in this order.”</i></p> <p>Therefore, the DISCOMs may be advised to file a separate petition for Grid Support charges for FY 2025-26 with full details of such charges in other states.</p>	Noted. As instructed by the Hon’ble Commission in Order OP Nos. 80 & 81 of 2022, the Licensee has computed the Grid Support Charges as per the relevant methodology stated in the regulations. The Licensee will abide by the directions of the Hon’ble Commission in this regard.
7 b)	<u>Unblocking of RKVAH lead for KVAH billing:</u> The Discoms have requested that leading KVARH be unblocked for the purpose of billing to avoid excess injection of leading KVARH into the system. The formula to be considered suggested as below.	Hon’ble TGERC had issued Directive No: 5 (April 24 – March 25) in the Retail Supply Tariff Order for FY 2024-25, dated 28.10.2024 to provide impact of unblocking RKVAH lead.

<p> $KVAH = \sqrt{(kwh)^2 + (RKVAH \text{ lag} + RKVAH \text{ lead})^2}$ </p> <p> (in place of existing formula $KVAH = \sqrt{(kwh)^2 + (RKVAH \text{ lag})^2}$) </p> <p> We feel that it is beneficial to the system. However, in absence of this mechanism in the country, we feel that comprehensive consultation need to be conducted before its acceptance. </p>	<p> Based on the above direction, the TGDISCOs had studied the impact of blocking of RKVAH Lead for different voltage levels of HT Consumers and observed the loss of energy and demand recorded at consumer end due to blocking of P.F. lead </p> <p> 1. The DISCOs of the combined AP state shifted from KWH billing to KVAH billing in case of high value consumers from FY 2011-12 as per the approval of the Commission. It is also understood that the lead block in the meter is being continued in TGDISCOs whereas the same was discontinued in the APDISCOs from FY 2019-20. </p> <p> 2. In the Retail Tariff order of APERC for FY 2011-12 at PARA (4) of PART-D states as follows: </p> <p> "HT consumers and LT consumers, except LT-I Domestic who are provided with metering capable of measuring active and reactive power under the orders of the Commission, shall maintain their power factor preferably in between 0.95 lag and 0.95 lead in the interest of the system security. The consumers should not maintain the power factor on leading side less than 0.95. If any consumer maintains the power factor less than 0.95 lead for a period of 2 consecutive months, it must be brought back in the range of ± 0.95 within a period of 3 months failing which without prejudice to such other rights as having accrued to the licensee or any other right of the Licensee the supply to the consumer may be discontinued. However, for the purpose of KVAH billing leading KVARH shall be blocked." </p> <p> Further, Joint Managaing Director (Fin., Comml., HRD&Vig) TSTRANSCO in the letter addressed (D.No.149/22,Dt.07.11.2022) to the Hon'ble Chairman and Managing Director TGSPDCL and TGNPDCL has made following observations/ Suggestions </p> <p> I. In lag only billing system (presently being followed by TSDISCOs), only 'RkVAh lag' is considered for </p>
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		<p>the same as that required for same lead PF and hence will ensure equitable treatment in case of Lag or Lead PF.</p> <p>III. It is also noted that, in the report on "Metering Issues" (August 2009) available in the website of Forum of Regulators, the FoR observed that there is no difference between leading and lagging power factor in reduction of network capacity and increasing the energy and power losses.</p> <p>IV. For better grid discipline, lag plus lead billing system gives meaningful kVAh as static meters are envisaged the measurement of both leading and lagging reactive power.</p> <p>V. Further it is to inform that, capacitors should remain in circuit as long as the load runs and & must be cut-off as soon as the load is switched off. However, in the existing lead block billing system, the lead pf will be treated as unity. As a result, some of the consumers were keeping their capacitors in ON condition even when no load is connected to the system thereby maintaining leading PF i.e. on the pretext of maintaining unity pf, consumers were over compensating. Such condition not only injects reactive power into the system but also is detrimental to the healthiness of the Grid for various reasons such as the utilization of transformer capacity (KVA) is blocked due to increase in current, line loss gets increased due to increase in current, over-voltage problem occurs in secondary side of transformer etc. This is not only harmful to grid but also to the consumer's equipment which is connected to system. Hence Unblocking of RkVAh lead may be considered for all HT services (except LIS services) for commercial warning to use electricity at Unity Pf.</p> <p>The abstract of loss of energy and demand due to blocking of leading KVARH for different voltage level consumers was assessed and the need and justification for unblocking of RKVAH Lead for KVAH Billing was duly submitted in the ARR petition before the Hon'ble Commission.</p>
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		Hence, TGDISCOMs would like to re-affirm that it is possible to implement this intervention and request the Hon'ble Commission to kindly approve the proposal for unblocking of RKVAH lead for KVAH billing.
7 c)	<p><u>Cross Subsidy Surcharge:</u> TGSPDCL has provided category wise computation of Cross Subsidy surcharge (para 9.2.2). 20% limit on average realization of the tariff is considered as the limit for CSS. Now TGSPDCL is requesting not restrict the Cross-Subsidy Surcharge at 20% of tariff payable by the consumer as the tariffs are not within +/- 20% Average Cost of Supply for some categories. But as per MoP Amendment Rules 2022 dated 29.12.2022, the following is stipulated; <i>"Surcharge payable by Consumers seeking Open Access: The surcharge determined by the State Commission under clause (a) of sub-section (1) of section 86 of the Electricity Act, 2003 shall not exceed twenty percent of the average cost of supply"</i> Therefore, limiting the CSS maximum at 20% of Average Cost of Supply may be examined.</p>	In the current ARR filing for FY 2025-26, the Cross Subsidy Surcharge has been computed as per the National Tariff Policy 2016 and has been limited to +/- 20% of the average billing rate (ABR) for the specific consumer category.