Northern Power Distribution Company of Telangana Ltd. (TGNPDCL)

Responses to Objections / Suggestions

on True-up for FY 2024-25

and

revised ARR & Wheeling Tariff Proposals

for Distribution Business for FY 2026-27

INDEX

1. **Response to M. Timma Reddy, Convenor, People's Monitoring Group on Electricity Regulation**

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1.	For the FY 2024-25, as a part of the true up filings, TGSPDCL is claiming 20.18% higher ARR than allowed by the Commission. It is claiming 51.17% higher depreciation and 48.29% higher interest on working capital. Similarly, TGNPDCL is claiming 6.06% higher ARR, 30.60% higher depreciation, 34.02% higher interest on long-term loans and 41.38% higher interest on working capital. As the expenditures claimed by TGDISCOMs deviate significantly from the approval given by the Commission these claims shall be subjected to critical scrutiny.	The variations in ARR and cost components are primarily due to actual audited expenditures incurred during FY 2024-25, which differ from approved in the MYT Order. As per Regulation 6.2(e), true-up petitions allow recovery of legitimate costs subject to prudence check. The increase in depreciation, interest on loans and return on equity is due to variation in asset base considered by Hon'ble Commission, which is lower againt actuals as per book of accounts for FY 2024-25 and interest is attributable to capitalisation and loan drawals for approved schemes. We request the Commission to consider these variations as per the true-up mechanism provided in the MYT Regulations, 2023 (2 of 2023).
2.	While TGSPDCL is claiming 78.67% higher expenditure under return on equity (RoE) TGNPDCL is claiming 110.71% higher expenditure under RoE during the FY 2024-25. TGDISCOMs are claiming higher RoE than allowed by the Commission in the Order dated 28-10-2024 on ARR and Wheeling Tariff for Distribution Business for Control Period FY 2024-25 to FY 2028-29.	The variation arises due to the difference in the asset base considered by the Hon'ble Commission, which is lower than the actual figures as per the audited books of accounts for FY 2024-25, and also because the RoE has been considered at 11%. Further, TGNPDCL has claimed a RoE of 16% based on Regulation 29.2(e), which permits a base RoE of 14% with an additional incentive of up to 2% linked to compliance with the Standards of Performance (SoP). The additional Return on Equity (RoE) claimed reflects our sustained efforts toward improving service quality and operational efficiency. We request the Hon'ble Commission to approve the claim in accordance with the performance-linked incentive provisions.

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<tr><td>3.</td><td>The Commission in its Order reduced the RoE for the FY 2024-25 to 11% for delay in filing ARR and tariff proposals (para 4.6.8). The same rate shall be maintained. Allowing the TGDISCOMs claim amounts to condoning this delay.</td><td>While there was a delay in filing ARR and tariff proposals, it was due to complexities in data segregation and compliance with new MYT formats. The delay was not intentional and occurred during the transition to the 5th Control Period. We request the Commission to consider this context and allow the RoE as claimed, as the delay did not impact consumer service delivery.</td></tr>
<tr><td>4.</td><td>TGDISCOMs are claiming 2% higher RoE for achieving standards of performance (SoP). TGDISCOMs' claims on SoP cannot be accepted. Their claims related to achieving SoP needs to be verified on the ground. Their claims related to achieving SoP shall be subjected to third party scrutiny. We request the Commission not to approve higher RoE claimed by TGDISCOMs.</td><td>The additional 2% RoE claimed is in accordance with Regulation 29.2(e), which incentivizes licensees for achieving SoP. We have implemented measures to improve reliability, reduce interruptions, and enhance consumer grievance redressal. We request the Commission to approve our claim.</td></tr>
<tr><td>5.</td><td>Frequently we come across news about arrest of TGDISCOMs staff by Anti Corruption Bureau (ACB) for indulging in corrupt practices. These facts deny TGDISCOMs' claims about achieving SoP. We request the Commission to direct TGDISCOMs to provide details regarding their staff arrested by ACB and action taken against them.</td><td>Isolated incidents reported in the media do not reflect the overall performance of TGDISCOMs. We have robust internal vigilance mechanisms and take disciplinary action against erring staff.
We request the Commission to consider performance metrics and audited compliance reports rather than anecdotal reports. The details of the action taken against erring staff for FY 2024-25 and FY 2025-26 are provided in the Annexure - I</td></tr>
<tr><td>6.</td><td>Distribution ARR for FY 2026-27 (Rs. in Cr)
<table><tr><th>Particulars</th><th>Approved (Rs.CR)</th><th>Revised (Rs.CR)</th><th>Increase %</th></tr><tr><td>O&M Charges</td><td>2,679.46</td><td>2,818</td><td>5.19</td></tr></table></td><td>The Hon'ble Commission has approved O&M expenses by applying escalation on the average of the true-up expenses for the immediate</td></tr>
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Depreciation	413.49	595	44.07
Interest and finance charges on loans	358.53	360	
Interest on working capital	71.11	100	40.85
Return on equity	190.88	220	15.18
Impact True up 2024-25		484	
Non-tariff income	178.63	183	
Income from Open Access	9.00	3.23	
Distribution ARR	**3,525.84**	**4,391**	

</td><td rowspan="2">preceding control period, and this if further escalated for 3 years as per clause No. 81 of Regulation No. 2 of 2023. However, the approved amount so derived is lower than the actual expenditure incurred during FY 2023-24. O&M cost escalation is based on CPI/WPI indices in accordance with Regulation 81.3 based on actuals for FY 2024-25. This revision is primarily on account of actual employee cost, repairs & maintenance activities, and administrative expenses, projected based on CPI/WPI.
The Hon'ble Commission has approved Employee cost for FY 2024-25 by applying escalation on the average of the true-up expenses for the immediate preceding control period, and this if further escalated for 3 years as per clause No. 81 of Regulation No. 2 of 2023. However, the approved amount so derived is lower than the actual expenditure incurred during FY 2023-24.
Further, the methodology specified by the Commission does not cosider three aspects viz. (i) the impact of variation in number of employee's year on year, (ii) impact of Pay Revision (iii) impact of the yearly increments of the employees of the licensees.
The increase in depreciation, interest on finance charges and return on equity is due to variation in asset base considered by Hon'ble Commission is lower againt actuals as per book of accounts for FY 2024-25. The revised ARR for FY 2026-27 is computed based on actual cost trends, inflation, and capital investment requirements. We request the</td></tr>
<tr><td>7.</td><td>The Commission had issued the MYT Wheeling tariff order for distribution business related to 5th control period on 28th October 2024. In that order the Commission had approved distribution business ARR for each year of the 5th control period. TGDISCOMs in their present filings have claimed that in accordance to the regulation, the DISCOMs have computed the ARR of Distribution business against each cost element based on the Distribution MYT Tariff Order for 5th Control Period as approved by Hon'ble TGERC. But there is wide variation between the distribution ARR approved by the Commission for the FY 2026-27 as a part of 5th Control Period wheeling tariff order and the present filings by the TGDISCOMs. At the same time TGDISCOMs did not provide reasons for the variations in expenditure and income figures. In the case of TGNPDCL while the</td></tr>
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	Commission had approved Rs. 3,525.84 crore in the ARR for FY 2026-27 the DISCOM is claiming Rs. 4,391 crore. Similarly, in the case of TGSPDCL while the Commission had approved Rs. 5,133.68 crore the DISCOM is claiming Rs. 6,542 crore. Even after taking in to account the impact of true up for FY 2024-25 TGDISCOMs' claims are higher than that approved by the Commission.	Commission to consider these variations as we have filed our submission in accordance with MYT Regulations, 2023 (2 of 2023).
8.	In the case of TGSPDCL revised claims on O&M charges are higher by 11.47%, on depreciation higher by 54.10%, on interest on long term loans higher by 51.62%, on interest on working capital higher by 45.63% and on return on equity higher than 38.22%. Similarly, in the case of TGNPDCL revised claims on O&M charges are higher by 5.19%, on depreciation higher by 44.07%, on interest on working capital higher by 40.85% and on return on equity higher than 15.18%. Given this wide deviation TGDISCOMs' claims related to distribution ARR for the year 2026-27 shall be thoroughly scrutinised.	
9.	In the present filings for the FY 2026-27 while TGNPDCL has proposed a rate of interest of 10.76% on loans, TGSPDCL has proposed a rate of interest of 9.97%. These rates of interest are higher than those claimed during the 4th control period. As such TGDISCOMs'	The proposed interest rates for FY 2026-27 reflect the prevailing market conditions and the actual composition of TGNPDCL's loan portfolio. The projected interest on loan has been computed based on the weighted average interest rate, considering (i) the existing loan book, (ii) the interest rates applicable to new borrowings, and (iii) the scheduled

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	proposed rates of interest for the FY 2026-27 need to be brought down. TGDISCOMs may be advised to go in for swapping of loans to bring down interest burden	repayment obligations. Based on this, the weighted average projected interest rate works out to 10.76% for FY 2026-27. Further, TGNPDCL submits that, in order to reduce the financing cost burden, TGNPDCL is actively engaging with lenders to renegotiate existing loan terms, including seeking reduction in interest rates, and exploring restructuring options wherever feasible, with the objective of lowering the overall cost of debt. These efforts are ongoing to ensure that the interest burden on consumers is minimized and the financing structure becomes more sustainable. We requested the Hon'ble Commission to consider the proposed interest rate in accordance with the MYT Regulations, 2023 (Regulation No. 2 of 2023). In case of any reduction in interest rates achieved through these negotiations or restructuring will be fully reflected and claimed appropriately during the True-Up.
10.	As a part of distribution business ARR for FY 2026-27 TGDISCOMs are claiming return on equity of 16%. This includes 14% towards regular return on equity and 2% for achieving Standards of Performance (SoP). The Commission in its Order dated 28-10-2024 on ARR and Wheeling Tariff for Distribution Business for Control Period FY 2024-25 to FY 2028-29 adopted 14% as return on equity. The same shall be applied to present application of TGDISCOMs for the FY 2026-27.	The additional 2% RoE claimed is in accordance with Regulation 29.2(e), which incentivizes licensees for achieving SoP. We have implemented measures to improve reliability, reduce interruptions, and enhance consumer grievance redressal. In view of the above, licensee is confident in achieving the SoP. We request the Commission to allow this claim.

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11.	This additional 2% towards return on equity may be allowed after completion of the FY if DISCOMs achieve the target SoP. TGDISCOMs' claims on achieving SoP needs to be thoroughly scrutinized by the Commission or shall be subjected to third party verification. Electricity consumers in the state are at the receiving end. TGDISCOMs' claims on achieving SoP do not reflect the ground reality. We often come across news reports of DISCOM staff being arrested by Anti Corruption Branch (ACB) for their corrupt practices. But these arrests represent just tip of an iceberg and the rot runs deep. Arrested DISCOM staff are initially suspended and reinstated after 6 months, without any punishment. We request the Commission to direct TGDISCOMs file details of the DISCOM staff arrested by ACB during the FYs 2024-25 and 2025-26 and action taken on these staff. Electricity consumers in the state deserve better service.	TGNPDCL respectfully submit that the additional 2% RoE linked to Standards of Performance (SoP), as provided under Regulation 29.2(e), should not be deferred entirely to the true-up stage. If this component is allowed only during true-up, DISCOM will lose revenue through wheeling charges because the higher RoE will not be factored into the wheeling tariff computation for the year. This creates a structural disadvantage despite compliance with SoP targets. TGNPDCL have implemented robust measures to meet SoP requirements, including reliability improvements, timely consumer service delivery, and safety initiatives. We therefore request the Hon'ble Commission to consider allowing the additional 2% RoE provisionally in the ARR, subject to post-year verification, so that wheeling charges reflect the correct cost structure and DISCOM is not penalized for timely compliance. We have robust internal vigilance mechanisms and take disciplinary action against erring staff. The details of the same for FY 2024-25 and FY 2025-26 are provided in the Annexure – I.
12.	TGSPDCL mentioned that it will be spending Rs. 176 Crore towards AT&C loss reduction during the ensuing financial year. TGNPDCL will be spending Rs. 9 Crore under the same heading. Past experience shows that there was not much improvement on this front. Given zero	TGNPDCL submits that the proposed AT&C loss reduction expenditure of Rs. 9 crores have been considered as approved in the MYT Order for 5th Control Period.

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	or negative returns this expenditure on AT&C loss reduction shall not be allowed.	
13.	TGDISCOMs' expenditure on capital and other expenditure shall be prudent and taken up through transparent bidding process. It has to be seen that bid terms are not drafted to benefit a select few vendors. There were also instances of spending more than necessary leading to higher capital expenditure. According to a news report published in Namaste Telangana on 10th October 2025 while bid rate for cable per meter was Rs. 3,019 TGSPDCL spent Rs. 5,200 per meter.	All procurements follow transparent e-tendering, competitive bidding in accordance with Regulation 2 of 2023 and specification-driven evaluation (IS/IEC compliance, conductor class, insulation thickness, fire-retardant properties, installation accessories, warranty).
14.	TGSPDCL proposed converting overhead lines in to underground cables in Hyderabad for reliable and safe electricity distribution at a total estimated cost of Rs. 14,725 Crore. The DISCOM proposes to spend Rs. 4,725 Crore on this during the FY 2026-27. In the write up it was stated that details were provided in Annexure-III (para.2.3). But no Annexure-III was provided as a part of the petition.	Not pertaining to TGNPDCL
15.	Underground cable work is also described as an aesthetic exercise, to improve the looks of Hyderabad city. Will there	Not pertaining to TGNPDCL

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	be any financial support from GHMC or GoTG for the proposed underground cable work?	
16.	Underground cable works are being rushed through in the background of electrical accidents involving overhead lines during the month of August 2025. In the background of these accidents overhead internet and TV cables were removed from electric poles. During this exercise some cable operators claimed that they have paid service charges for using electric poles to hang the cables. We would like to know whether income from this source is included under non-tariff income.	Not pertaining to TGNPDCL

2. Response to Cellular Operators Association of India (COAI)

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1.	We note from the Public Notice that the proposed wheeling charges for LT category consumers have been fixed at Rs. 767/kvA/month for Southern Power Distribution Company of Telangana Limited and Rs. 1,196/kvA/month for Northern Power Distribution Company of Telangana Limited. The proposed levels represent a substantial increase in the fixed cost burden on open access consumers. Such high wheeling charges, when applied uniformly, significantly escalate the overall cost of power procurement, particularly for consumers with geographically dispersed loads and round-the-clock operational requirements, such as the telecom sector. The impact is further magnified for consumers sourcing power under the Green Energy Open Access mechanism, where additional statutory charges already apply, therebv rendering renewable power procurement financially unattractive despite its environmental benefits.	The proposed wheeling charges of Rs. 767/kVA/month for TGSPDCL and Rs. 1,196/kVA/month for TGNPDCL. These charges are determined strictly in accordance with the TGERC Multi-Year Tariff (MYT) Regulations, which mandate recovery of distribution network costs based on voltage level and cost causation principles, not on the source of energy. The approach considered by the Hon'ble Commission in its MYT order for 5th Control Period is shown below: *"4.13.4 Further, Clause 79.2 of Regulation No. 2 of 2023, clearly specifies that the Wheeling Charges shall be determined separately for LT voltage, 11 kV voltage, and 33 kV voltage.* *4.13.5 In accordance with Clause 79.2 of Regulation No. 2 of 2023, the Commission has computed the Wheeling Charges for the Control period i.e. FY2024-25 to FY2028-29.* • *The year wise approved ARR for each year of the Control Period, i.e. FY2024-25 to FY2028-29 has been allocated amongst 33 kV, 11 kV and LT voltage levels;* • *Having allocated the components of ARR among each voltage, the cost attributable for each voltage has been computed;* • *The demand incident at each voltage level has been arrived at by considering the voltage wise demands in the ratio on actuals available with the Commission and approved losses as per Resource Plan Order dated 29.12.2023;*

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		• *The voltage wise wheeling charges have been computed by dividing the apportioned ARR at each voltage level by the demand at that voltage level.”* The distribution network must maintain capacity to serve contracted demand irrespective of whether the consumer procures power from conventional or renewable sources. Therefore, the methodology adopted by the Commission—fixed wheeling charges linked to kVA demand—is cost-reflective and consistent with regulatory framework.
2.	We respectfully submit that Green Energy sourced power, by its very nature, has lower plant load factor and efficiency as compared to conventional sources, owing to intermittency and variability of renewable generation. Applying uniform wheeling charges without accounting for these inherent characteristics makes Green Energy Open Access (GEOA) economically unviable for consumers for the telecom sector, which is othenrvise committed to increasing renewable energy adoption in line with national sustainability goals.	While we acknowledge that renewable energy has inherent intermittency and lower PLF, these characteristics affect generation economics, not network cost drivers. The network remains obligated to provide the same level of readiness and reliability for all users including open access users. Differentiating wheeling charges based on generation source, which is contrary to the principles of non-discrimination and cost reflectivity in the MYT framework.
3.	In view of the above, we strongly urge to define and notify a separate and rational wheeling charges per unit specifically for Green Energy sourced power.	The MYT Regulations and Commission’s past orders do not envisage a separate wheeling charge for green energy or a shift from capacity-based

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	Without such differentiation, the high wheeling charges per unit will negate the intended benefits of GEOA and discourage telecom sector from transitioning to renewable energy, thereby undermining both environmental objectives and policy intent.	charges (Rs. /kVA/month) to energy-based charges (Rs. /kWh). The abstact of Clause 79.2 of Regulation 2 of 2023 id provided below: *“The Wheeling Charges of the Distribution Licensee shall be determined by the Commission on the basis of a Petition for determination of Tariff filed by the Distribution Licensee:* *Provided that the Wheeling Charges shall be denominated in terms of Rupees/kVA/month for long-term and medium-term Open Access and in terms of Rupees/kVA/hr for short-term Open Access, for the purpose of recovery from the Distribution System User, or any such denomination, as may be stipulated by the Commission:* *Provided further that the Wheeling Charges shall be determined separately for LT voltage, 11 kV voltage, and 33 kV voltage, as applicable.”* However, we respectfully submits that TGNPDCL’s filing for FY 2026–27 has also provided wheeling charges expressed in Rs. /kWh in addition to the standard Rs. /kVA/month structure.
4.	We therefore request you to kindly consider Clur concerns and provide appropriate relief by rescribing a separate, lower wheeling charge framework for Green Energy sourced power, so as to ensure long-term viability of GEOA and promote sustainable energy usage by essential service sectors such as telecommunications.	The Electricity (Promoting Renewable Energy through Green Energy Open Access) Rules, 2022 provide certainty on applicable charges—transmission, wheeling, CSS, and standby—but do not mandate concessional wheeling charges for renewable energy. *“9. Charges to be levied for Open Access.– (1) The charges to be levied on Green Energy Open Access consumers shall be as follows:-* *(a) Transmission charges;* *(b) Wheeling charges;*

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	We respectfully pray to notify a separate wheeling charge for Green Energy soureed power, considering its inherent intermittency and lower efficiency or define wheeling charge per unit (Rs/kwh) so as to ensure the viability of Green Energy Open Access and promote renewable energy adoption.	*(c) Cross subsidy Surcharge;* *(d) Standby charges wherever applicable; and* *(e) No other charges except the charges above, shall be levied"* Thus, the current approach is fully compliant with Electricity (Promoting Renewable Energy through Green Energy Open Access) Rules, 2022. TGDISCOMs respectfully submit that COAI's request for a separate or wheeling charges for green energy, does not align with the TGERC MYT framework or GEOA Rules. We request the Commission to consider the same methodology as defined in Regulation 2 of 2023 for determination of wheeling charges

3. **Response to Sri M. Venugopal Rao, Senior Journalist & Convener, Centre for Power Studies**

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1.	The Hon'ble Commission has issued public notices on the following 15 petitions, inviting objections and suggestions from interested public. The last dates for filing objections and suggestions range from the 1st to 12th January, 2026. The petitions are in 17 volumes running into nearly 2000 pages. The following are the petitions: 1. True-up for 1st year of 5th Control Period i.e., FY 2024-25 vide O.P.No.70 of 2025 of TGSPDCL and vide O.P.No.71 of 2025 of TGNPDCL 2. Revised ARR and tariff proposal for FY 2026-27 vide O.P.No.72 of 2025 of TGSPDCL and vide O.P.No.73 of 2025 of TGNPDCL. Last date for filing objections and suggestions in both the petitions is 12.1.2026 3. ARR proposed and revised transmission tariff and charges for FY 2026-27 and True up for FY 2024-25 for transmission business vide O.P.No.68 of 2025. 4. ARR proposed and revised SLDC charges for FY 2026-27 and True up for FY 2024-25 for SLDC Activity vide O.P.No.69 of 2025. Last date for filing objections and suggestions in both the petitions is 10.1.2026 5. Filings made by SCCL in the matter of Annual tariff for FY 2026-27 containing ARR and Revised tariff proposal for FY 2026-27 and True-Up for FY 2024-25 vide O.P.No.64 of 2025 in respect of 2X600 MW Singareni Thermal Power Plant. Last date for receiving Comments/Suggestions: 10.1.2026 6. Filings made by TGGENCO in the matter of Annual tariff for FY 2026-27 containing ARR and Revised tariff proposal for FY 2026-27 and True-Up for FY 2024-25 vide O.P.No.67 of 2025 in respect of Generation Business. Last date for receiving Comments/ Suggestions: 10.1.2026.	Under the purview of Hon'ble Commission.

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	7. Filings made by TGNPDCL vide O.P.No. 66 of 2025 and TGSPDCL vide O.P.No. 65 of 2025 in the matter of determination of Additional Surcharge for H1 of FY 2026-27. Last date for receiving comments/ suggestions: is 9.01.2026 8. Filings made by TGGENCO in the matter of determination of Capital Cost and Provisional Tariff in respect of the following: a. Unit-2 (800MW) of YTPS for the period from FY 2024-25 to FY 2028-29 vide O.P.No.77 of 2025. b. Unit-1 (800MW) of YTPS for the period from FY 2025-26 to FY 2028-29 vide O.P.No.76 of 2025. Last date for receiving comments/suggestions: 9.01.2026 9. Filings made by TGGENCO in the matter of Approval of Additional Capital Cost in respect of the following: a. New Conveying System and Construction of Space frame structure raw coal storage shed at BTPS vide O.P.No.74 of 2025. b. Construction of Quarters at KTPS-VII Stage vide O.P 78 of 2025. c. Raising of Additional Ash Pond bunds at KTPS V&VI Stages vide O.P.No.75 of 2025. Last date for receiving comments/suggestions: 9.1.2026 10. Commission invites comments and suggestions in the matter of consent to procure a share of 800 MW from the 2400 MW (3X800 MW) of Telangana Super Thermal Power Station (Telangana STPP) Stage-II instead of procurement of 800 MW exclusively from one unit and approval to the draft PPA signed by TGDISCOMs with NTPC for procurement of a share of 800 MW power from 2400 MW (3x800 MW) Telangana STPP Stage-II for a period of 25 years vide I.A.No.39 of 2025 in O. P. No.31 of 2025. Last date for receiving comments/suggestions: 1.1.2026	

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	Needless to say, it is impossible to study all the above-mentioned petitions in detail, analyse and prepare comprehensive submissions simultaneously within the time stipulated by the Commission. Preoccupied with other pressing engagements and preparation of submissions on ARR and tariff revision proposals of APDISCOMs for the FY 2026-27 till the end of last year, could not even examine the above-mentioned 15 petitions. From the 5th to 10th of this month, I will be held up in unavoidable family attention. As the Hon'ble Commission is aware, serious objectors participating in the regulatory process on issues like the said 15 petitions in larger public interest can literally be counted on fingertips, as experience has been confirming. We had earlier experience of facing a similar situation and in view of no extension of time granted, we could not file detailed submissions. We request the Hon'ble Commission to extend time for filing detailed submissions till 25th of this month, especially in IA No.39 in OP No.31 of 2025 and OP Nos.76 and 77 of 2025 and OP Nos.70, 71, 72 and 73.	

4. **Response to Power Foundation of India (PFI)**

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1.	Power Foundation of India (PFI) is a Policy Research & Advocacy entity, registered as a society under the aegis of Ministry of Power, Government of India. PFI is supported by leading Central Power Sector Organizations to undertake evidence-based policy research and facilitate informed decision making by the Regulators, Ministry and other concerned stakeholders. PFI has been a party in the process of Distribution Tariff determination. For last financial year Petitions related to True-up FY 2023-24 and ARR FY 2025-26, PFI had submitted its comments/suggestions to various SERCs of Maharashtra, Andhra Pradesh, Punjab, Telangana, Madhya Pradesh, Rajasthan, Uttar Pradesh, Tamil Nadu, Uttarakhand and have also presented our comments/suggestions before Hon'ble Commission in Public Hearing. This year also we intent to file comments / suggestions on True-up FY 2024-25 and ARR FY 2026-27. However, due to voluminous data and less time period provided by TGERC we request time extension of 10 days after Last Date to enable us to submit our comments on Tariff Petitions. An extension would allow for a more comprehensive and high-quality analysis and response, which we believe is in the public interest and will aid the Commission in its determination of Tariff. We greatly appreciate your understanding and kind consideration of this request.	Under the purview of Hon'ble Commission.