

Southern Power Distribution Company of Telangana Ltd. (TGSPDCL)



Responses to Objections / Suggestions

On

True-up for FY 2024-25

and ARR for Distribution Business

and Determination of Wheeling Tariffs for

FY 2026-27

Response to Telangana Solar Open Access Developers Association (TSODA), #8-3-224/4/A, Pt no. 11& 12, Sy No. 01, Room No. 412, Madhura Nagar, Yousufguda, Hyderabad, 500038, Email: tsoda.hyd@gmail.com

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	<p>The Southern Power Distribution Company of Telangana Limited (TGSPDCL) has filed its Revised Aggregate Revenue Requirement (ARR) and proposed wheeling charges for FY 2026-27. The Objector submits that the proposed wheeling charges are not supported by demonstrated incremental costs attributable to open access consumers, are contrary to the regulatory framework, excessive, unreasonable, and disproportionate. If approved, the proposal would seriously undermine open access and renewable energy projects in the State.</p> <p>1) The proposed charges are not cost-reflective and impose an undue financial burden on distribution system users, defeating the objective of promoting open access under the Electricity Act, 2003.</p>	<p>TGSPDCL respectfully submits that the proposed wheeling charges have been computed strictly in accordance with the methodology prescribed under Regulation No. 2 of 2023 and the Hon'ble Commission's MYT Order for the 5th Control Period. The charges are not arbitrary; they result directly from the voltage-wise allocation of ARR.</p> <p>The Electricity Act, 2003 requires network charges to be cost-reflective and non-discriminatory, and TGSPDCL has fully adhered to these principles. Wheeling charges recover common distribution network costs, which are incurred irrespective of whether a consumer draws power through DISCOM supply or via Open Access. No incremental or OA-specific charges have been added beyond those permitted in the MYT Regulations.</p> <p>Accordingly, the allegation that the proposed wheeling charges impose an undue burden, undermine open access, or deviate from the regulatory framework does not arise. TGSPDCL reiterates that every element of the filing is transparent, regulation-compliant, and subject to the Hon'ble Commission's prudence review.</p>
2.	<p>2) Only 10% of net ARR is transferred to retail supply under the MYT framework (Regulation 2 of 2023), it is submitted that network modernization primarily</p>	<p>TGSPDCL submit that the 90:10 ARR split between Distribution and Retail Supply is the allocation under Regulation No. 2 of 2023. This does not mean that 90% of ARR is recovered from open</p>

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	<p>benefits retail consumers. Loading these costs (90%) on open access users violates the principle of causation. Since both the distribution and retail supply businesses are managed by the same utilities, there is limited sensitivity to this allocation for them. Such a disproportionate apportionment results in an undue burden on open access users and runs contrary to the principle of causation. However, the TGDISCOMs have proposed no revision in retail supply tariff despite projecting substantial capital expenditure under Renovation and Modernization, technology upgradation measures, and underground cable projects.</p>	<p>access consumers. Retail supply consumers continue to bear their share of the 90% distribution ARR also and the 10% through the retail tariff determination process.</p> <p>For the limited purpose of computing wheeling charges, only the distribution portion (90%) of ARR is considered, because wheeling charges recover network usage costs, not retail supply costs. This ensures that OA consumers pay only for network readiness and capacity reserved for them, strictly in line with cost-causation principles. There is no loading or shifting of full ARR onto open access users.</p> <p>The assertion that network modernization benefits only retail supply consumers is misplaced. All users—including open access consumers—depend on the same strengthened feeders, substations, redundancy, protection systems, and automation infrastructure. Therefore, recovery of these network costs through wheeling charges is fully justified. It may be appreciated that any improvement in network reliability and quality of supply is also availed by open access consumers and not limited to retail consumers.</p> <p>TGSPDCL reiterate that the proposed wheeling charges fully comply with the MYT Regulations and have no deviation from the methodology approved by the Hon'ble Commission.</p>

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3.	<p>3) The Objector has repeatedly represented for a change in the wheeling charge denomination from Rs. /kVA/month to Rs. /kWh for LTOA and MTOA users as well, in line with the Electricity (Second) Amendment Rules, 2024 and the practice followed across most States. States such as Andhra Pradesh, Tamil Nadu, Karnataka, Kerala, Gujarat, Maharashtra, and Rajasthan levy wheeling charges on Rs. /kWh basis aligning with actual network usage. Capacity-based ~/kVA wheeling relies on subjective demand assumptions such as coincident demand, whereas Rs./kWh-based wheeling is objective, usage-linked and non-discriminatory.</p>	<p>TGSPDCL submit that the denomination of wheeling charges is fully aligned with the TGERC MYT Regulations, 2023 and the approved MYT Order. The Commission has notified wheeling charges in Rs/kVA/month for long-term and medium-term open access, and also in Rs/kVA/hour for short-term open access users, exactly as provided in the notified tariff schedules.</p> <p>Accordingly, the wheeling charges filed by TGDISCOMs are fully compliant, follow the voltage-wise cost allocation methodology mandated under the MYT framework, and do not deviate from any regulatory requirement. The denomination and structure applied in the Petition are therefore appropriate, regulation-consistent, and transparently derived from the framework approved by the Hon'ble Commission.</p> <p>It may also be appreciated that transmission and distribution costs are primarily fixed in nature and such costs are best recovered on demand basis. Recovering fixed costs on energy basis will further exacerbate the issue of under-recovery of fixed costs.</p>
4.	<p>Further, the very purpose of the MYT framework is to ensure stability and regulatory certainty in wheeling charges over the control period. Frequent and substantial revisions during the control period defeat this objective and should be permitted only under</p>	<p>TGSPDCL submits that the revised ARR and wheeling charges for FY 2026-27 have been filed strictly in accordance with Regulation 6(e) of the TGERC MYT Regulations, which explicitly permits filing of Revised ARR and Wheeling Tariffs within the control period. The filing is therefore fully compliant and cannot be construed as a deviation from the MYT framework.</p>

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	genuine and exceptional circumstances, which are absent in the present case.	Accordingly, the submission does not undermine stability under the MYT framework; rather, it represents the exact regulatory process contemplated under Regulation 6(e) for revised ARR and wheeling charges for the relevant year.																																																								
5.	<p>It is further held that the purpose of wheeling charges determination is to collect wheeling charges from Open access users. For utilities it is just another entry in their books of accounts.</p> <p><i>The table below summarizes TGSPDCL's wheeling charge proposals vis-à-vis the current year.</i></p> <p>A. Wheeling Charges – Long-Term & Medium-Term Open Access</p> <table border="1" data-bbox="394 699 1014 857"> <thead> <tr> <th>Voltage Level</th> <th>FY 2025-26 (Existing) / kVA / month</th> <th>FY 2026-27 (Proposed) / kVA / month</th> <th>Change / kVA / month</th> <th>% Increase</th> </tr> </thead> <tbody> <tr> <td>33 kV</td> <td>₹46.58</td> <td>₹94.18</td> <td>₹47.60</td> <td>102.2%</td> </tr> <tr> <td>11 kV</td> <td>₹190.82</td> <td>₹275.33</td> <td>₹84.51</td> <td>44.3%</td> </tr> <tr> <td>LT</td> <td>₹635.10</td> <td>₹767.27</td> <td>₹132.17</td> <td>20.8%</td> </tr> </tbody> </table> <p>B. Wheeling Charges – Short-Term Open Access</p> <table border="1" data-bbox="394 886 1014 1044"> <thead> <tr> <th>Voltage Level</th> <th>FY 2025-26 (Existing) / kVA / month</th> <th>FY 2026-27 (Proposed) / kVA / month</th> <th>Change / kVA / month</th> <th>% Increase</th> </tr> </thead> <tbody> <tr> <td>33 kV</td> <td>₹0.0647</td> <td>₹0.1308</td> <td>₹0.0661</td> <td>102.2%</td> </tr> <tr> <td>11 kV</td> <td>₹0.2650</td> <td>₹0.3824</td> <td>₹0.1174</td> <td>44.3%</td> </tr> <tr> <td>LT</td> <td>₹0.8821</td> <td>₹1.0656</td> <td>₹0.1835</td> <td>20.8%</td> </tr> </tbody> </table> <p>C. Wheeling Losses Comparison</p> <table border="1" data-bbox="394 1065 1014 1187"> <thead> <tr> <th>Voltage Level</th> <th>FY 2025-26</th> <th>FY 2026-27</th> <th>Change</th> </tr> </thead> <tbody> <tr> <td>33 kV</td> <td>3.16%</td> <td>3.14%</td> <td>-0.02%</td> </tr> <tr> <td>11 kV</td> <td>4.04%</td> <td>4.01%</td> <td>-0.03%</td> </tr> <tr> <td>LT</td> <td>4.65%</td> <td>4.60%</td> <td>-0.05%</td> </tr> </tbody> </table> <p>The sharp 102% increase in 33 kV wheeling charges is primarily attributable to the large capital outlay proposed for Converting 33 kV overhead lines to</p>	Voltage Level	FY 2025-26 (Existing) / kVA / month	FY 2026-27 (Proposed) / kVA / month	Change / kVA / month	% Increase	33 kV	₹46.58	₹94.18	₹47.60	102.2%	11 kV	₹190.82	₹275.33	₹84.51	44.3%	LT	₹635.10	₹767.27	₹132.17	20.8%	Voltage Level	FY 2025-26 (Existing) / kVA / month	FY 2026-27 (Proposed) / kVA / month	Change / kVA / month	% Increase	33 kV	₹0.0647	₹0.1308	₹0.0661	102.2%	11 kV	₹0.2650	₹0.3824	₹0.1174	44.3%	LT	₹0.8821	₹1.0656	₹0.1835	20.8%	Voltage Level	FY 2025-26	FY 2026-27	Change	33 kV	3.16%	3.14%	-0.02%	11 kV	4.04%	4.01%	-0.03%	LT	4.65%	4.60%	-0.05%	<p>Wheeling charges are a regulatory cost-recovery mechanism determined strictly as per the MYT Regulations and the Commission's MYT Order. They recover the common network readiness cost attributable to usage by all eligible users (including OA) and are not profit-linked. For the utility, they are a cost-neutral accounting line within ARR—not an additional levy beyond what the Commission admits.</p> <p>The proposed change in 33 kV wheeling charges (LTOA/MTOA in Rs. /kVA/month and STOA in Rs. /kVA/hour) are inline with the Commission-approved methodology. The observed ~102% movement at 33 kV reflects the voltage-level cost stack and demand base for that voltage, including the proposed capex trajectory for reliability and contingency works, not any OA-specific loading. The wheeling charges filed by TGDISCOMs are fully compliant, follow the voltage-wise cost allocation methodology under the MYT framework, and do not deviate from any regulatory requirement.</p>
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	<p>Underground cables inter alia other renovation & Modernization proposals of the network.</p> <p><i>The table below presents a comparison of ARR for FY 2025-26 and proposal of FY 2026-27.</i></p> <table border="1" data-bbox="331 381 1020 898"> <thead> <tr> <th>Particulars</th> <th>FY 2025-26 (Approved)</th> <th>FY 2026-27 (Proposed)</th> <th>Change (₹ Cr)</th> <th>% Change</th> </tr> </thead> <tbody> <tr> <td>Operation & Maintenance Expenses</td> <td>3,717.46</td> <td>4,072.00</td> <td>+354.54</td> <td>+9.5%</td> </tr> <tr> <td>Depreciation</td> <td>945.95</td> <td>1,034.00</td> <td>+88.05</td> <td>+9.3%</td> </tr> <tr> <td>Interest & Finance Charges on Loan</td> <td>473.51</td> <td>840.00</td> <td>+366.49</td> <td>+77.4%</td> </tr> <tr> <td>Interest on Working Capital</td> <td>119.97</td> <td>150.00</td> <td>+30.03</td> <td>+25.0%</td> </tr> <tr> <td>Return on Equity</td> <td>243.79</td> <td>434.00</td> <td>+190.21</td> <td>+78.0%</td> </tr> <tr> <td>Total Expenditure</td> <td>5,500.68</td> <td>7,075.00</td> <td>+1,574.32</td> <td>+28.6%</td> </tr> <tr> <td>Less: Non-Tariff Income</td> <td>606.79</td> <td>532.00</td> <td>-74.79</td> <td>-12.3%</td> </tr> <tr> <td>Less: Income from OA Charges</td> <td>1.19</td> <td>1.20</td> <td>+0.01</td> <td>+0.8%</td> </tr> <tr> <td>Add / (Less): True-up Impact</td> <td>-30.17</td> <td>+545.00</td> <td>+575.17</td> <td>—</td> </tr> <tr> <td>Net Distribution ARR</td> <td>4,862.54</td> <td>6,542.00</td> <td>+1,679.46</td> <td>+34.6%</td> </tr> </tbody> </table> <p>Net Distribution ARR has increased by ~35% YoY, which is significantly higher than demand growth or inflation. Major drivers of increase are:</p> <ol style="list-style-type: none"> 1) Interest & Finance Charges (+77%) -> Because of Capex has increased 2) Return on Equity (+78%) -> Because of Capex has increased 3) Large True-up addition in FY 2026-27 <p>It is respectfully submitted that several State Electricity Regulatory Commissions, including Delhi, Tamil Nadu,</p>	Particulars	FY 2025-26 (Approved)	FY 2026-27 (Proposed)	Change (₹ Cr)	% Change	Operation & Maintenance Expenses	3,717.46	4,072.00	+354.54	+9.5%	Depreciation	945.95	1,034.00	+88.05	+9.3%	Interest & Finance Charges on Loan	473.51	840.00	+366.49	+77.4%	Interest on Working Capital	119.97	150.00	+30.03	+25.0%	Return on Equity	243.79	434.00	+190.21	+78.0%	Total Expenditure	5,500.68	7,075.00	+1,574.32	+28.6%	Less: Non-Tariff Income	606.79	532.00	-74.79	-12.3%	Less: Income from OA Charges	1.19	1.20	+0.01	+0.8%	Add / (Less): True-up Impact	-30.17	+545.00	+575.17	—	Net Distribution ARR	4,862.54	6,542.00	+1,679.46	+34.6%	<p>The ~35% YoY movement in Net Distribution ARR is the computation outcome of:</p> <ul style="list-style-type: none"> • Interest & Finance Charges on Loan and Return on Equity increasing in line with capitalisation and normative debt-equity (75:25); • True-ups are actual for O&M expense claims are inline with audited actuals as specified in Regulation 2 of 2023 • O&M projections are aligned to the Commission's norms and escalations specified under Regulation 2 of 2023. <p>All components have been computed exactly as per MYT Regulations and the 5th Control Period MYT Order. There is no deviation from the normative framework or any attempt to ascribe capex solely to OA users. Retail supply consumers continue to bear their proportionate share through retail tariff determination; only the distribution portion is considered for wheeling.</p> <p>The regulatory treatment of UG cabling differs by State and by execution model. In several representative city programs, projects were funded and executed by Government/ULBs/SPVs and later transferred to the licensee as consumer contribution, in which case only O&M is admitted in ARR. By contrast, TGSPDCL is executing these UG works as utility projects (similar to BESCO) where the capex, capitalization, and recovery follow the MYT</p>
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	<p>Karnataka, Maharashtra, Gujarat, and Andhra Pradesh, have consistently held that underground cabling works be excluded from ARR and shall be capitalised in the distribution licensee's ARR. In such cases, only O&M expenses have been permitted, treating these works as city or State infrastructure rather than routine distribution network augmentation.</p> <p><i>The table below summarizes representative instances from across India.</i></p> <table border="1" data-bbox="325 630 1014 1328"> <thead> <tr> <th>State</th> <th>City / Area</th> <th>Funding Authority</th> <th>Utility Involved</th> <th>Who Bore Capital Cost</th> <th>Regulatory Treatment</th> </tr> </thead> <tbody> <tr> <td>Andhra Pradesh</td> <td>Amaravati Capital City</td> <td>AP Capital Region Development Authority (State Govt.)</td> <td>APTRANSCO / APPDCL</td> <td>State Government (Grant-funded)</td> <td>Not loaded into ARR / Tariff</td> </tr> <tr> <td>Gujarat</td> <td>GIFT City, Gandhinagar</td> <td>GIFT City (State SPV)</td> <td>Dakshin Gujarat Vij Company Ltd</td> <td>State / SPV</td> <td>Treated as special infrastructure</td> </tr> <tr> <td>Delhi</td> <td>NDMC / Central Delhi</td> <td>Government of NCT of Delhi / New Delhi Municipal Council</td> <td>Tata Power Delhi Distribution Limited / BSES Rajdhani Power Limited</td> <td>Government / ULB Grants</td> <td>Excluded from tariff base</td> </tr> <tr> <td>Tamil Nadu</td> <td>Chennai (Smart City / Heritage zones)</td> <td>Government of Tamil Nadu / Greater Chennai Corporation</td> <td>TANGEDCO</td> <td>State + Govt Grants</td> <td>ERC disallowed ARR recovery</td> </tr> <tr> <td>Maharashtra</td> <td>Mumbai</td> <td>Government of Maharashtra / MCGM</td> <td>Adani Electricity Mumbai Ltd / Tata Power Company</td> <td>State / Municipal funding</td> <td>Not standard DISCOM capex</td> </tr> <tr> <td>Telangana</td> <td>Hyderabad (UG cabling around Secretariat & Necklace Road)</td> <td>Government of Telangana / Greater Hyderabad Municipal Corporation</td> <td>TGSPDCL</td> <td>State / GHMC</td> <td>Limited O&M only</td> </tr> </tbody> </table>	State	City / Area	Funding Authority	Utility Involved	Who Bore Capital Cost	Regulatory Treatment	Andhra Pradesh	Amaravati Capital City	AP Capital Region Development Authority (State Govt.)	APTRANSCO / APPDCL	State Government (Grant-funded)	Not loaded into ARR / Tariff	Gujarat	GIFT City, Gandhinagar	GIFT City (State SPV)	Dakshin Gujarat Vij Company Ltd	State / SPV	Treated as special infrastructure	Delhi	NDMC / Central Delhi	Government of NCT of Delhi / New Delhi Municipal Council	Tata Power Delhi Distribution Limited / BSES Rajdhani Power Limited	Government / ULB Grants	Excluded from tariff base	Tamil Nadu	Chennai (Smart City / Heritage zones)	Government of Tamil Nadu / Greater Chennai Corporation	TANGEDCO	State + Govt Grants	ERC disallowed ARR recovery	Maharashtra	Mumbai	Government of Maharashtra / MCGM	Adani Electricity Mumbai Ltd / Tata Power Company	State / Municipal funding	Not standard DISCOM capex	Telangana	Hyderabad (UG cabling around Secretariat & Necklace Road)	Government of Telangana / Greater Hyderabad Municipal Corporation	TGSPDCL	State / GHMC	Limited O&M only	<p>framework, subject to the Commission's scheme-approval and prudence checks.</p> <ul style="list-style-type: none"> If any GoTS grant and/or RDSS grant is sanctioned, TGSPDCL will promptly notify the Hon'ble Commission and ensure the grant-funded portion is excluded from depreciation/return/interest and treated per regulations. Until then, the filed treatment is consistent with MYT norms applicable to utility-executed distribution strengthening. <p>The FY 2024-25 O&M claim reflects statutory/actuarial obligations and field-driven needs (employee DA/PF actuarial, medical, essential R&M including UG assets). However, rejection is neither warranted nor consistent with the MYT framework. The comparison with FY 2025-26 "approved" values is not like-for-like, since those were for a different tariff year, while the true-up is based on actual audited performance.</p>
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	<p>So far as the True-up Petition for the 1st year of the 5th control Period, i.e., FY 2024-25, in O.P. No. 70 of 2025 filed by TGSPDCL is concerned, this Hon'ble Commission, after following due process, has already allowed O&M expenses of Rs. 3,717 Crs (as against the proposal of Rs. 3,822 Crs) for FY 2025-26, vide Order dated 29.04.2025 in the matter of Determination of Revised Aggregate Revenue Requirement (ARR) and Wheeling Tariffs for the Distribution Business for FY 2025-26.</p> <p>However, TGSPDCL has now claimed actual O&M expenses of Rs. 4,025 Crs for FY 2024-25, as against the approved cost of Rs. 3,585 Crs and even in excess of its own submission of Rs. 3,822 Crs for FY 2025-26.</p> <p>The said claim is devoid of merit and regulatory logic and is contrary to the principles governing prudence check and cost control. Accordingly, the True-up Petition deserves to be summarily rejected.</p>	
6.	<p>We, therefore, respectfully pray before this Hon'ble Commission as under:</p> <p>(i) To disallow the additional Capital Expenditure (Capex) proposals of the TGDISCOMs and to permit</p>	<p>The allegations are factually incorrect and misconceived. TGSPDCL's Revised ARR and wheeling charge proposals for FY 2026-27, as well as true-up claims for FY 2024-25, have been prepared strictly in accordance with the applicable MYT</p>

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	<p>only the Base Capex as approved under the MYT Order;</p> <p>(ii) To reject the True-up Petition; and</p> <p>(iii) To revise the denomination of wheeling charges from Rs. /kVA/month to Rs. /kWh in accordance with the Electricity (Second Amendment) Rules, 2024 and Section 181(1) of the Electricity Act, 2003.</p> <p>We, therefore, request this Hon'ble Commission to kindly consider and grant the above reliefs in the interest of justice and equity.</p>	<p>Regulations and the Hon'ble Commission's MYT Order for the 5th Control Period, applying the notified methodology for voltage-wise allocation, normative parameters (including 75:25 debt–equity), prudence-based capitalization, and denomination (Rs. /kVA-month for LTOA/MTOA and Rs. /kVA-hour for STOA). On underground cabling, TGSPDCL is executing utility projects and is committed that any sanctioned GoTS/RDSS grants will be promptly submitted to the Hon'ble Commission and excluded from RoE/interest/depreciation to the admissible extent. This will ensure that there is no double recovery of costs</p> <p>In view of the above, TGSPDCL respectfully prays that the Hon'ble Commission reject the unsubstantiated accusations and approve the filings as submitted—admitting capex and ARR elements, retaining methodology for wheeling charges—in the larger interest of network reliability, consumer service quality, and regulatory consistency.</p>