

NORTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED



**REPLIES TO
THE OBJECTIONS / SUGGESTIONS RAISED ON ARR & WHEELING
TARIFF PROPOSALS FOR DISTRIBUTION BUSINESS FOR 5TH CP
(FROM FY 2024-25 TO 2028-29)**

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Replies to the Objections/Suggestions raised on Distribution Business ARR & Wheeling Tariff Proposals for 5th Control Period by Sri M. Venugopal Rao, Senior Journalist & Convener, Centre for Power Studies, H.No.1-100/MP/101 Monarch Prestige, Journalist's Colony, Serilingampally Mandal, Hyderabad -500032 (Set-3, 08.10.2024)

| S.No. | Summary of Objections / Suggestions | Response of the Licensee | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|---------------------------------|--|--|---------|---------|---------|---------|---------|--------|--|--|--|--|--|-------------|-------|-------|-------|-------|-------|----------------|-------|-------|-------|-------|--------|---------------------------|-------|-------|-------|-------|-------|---------------------------------|-----|-----|-----|-----|-----|--------|--|--|--|--|--|-------------|-------|-------|-------|-------|-------|-------------|
| 1 | In response to the query of the Hon’ble Commission on delay in filing the subject petitions, the reasons given by the DISCOMs are untenable. In response to my requests made in my preliminary submissions dated 23.9.2024, the Hon’ble Commission has conveyed in its reply dated 27.9.2024 that it “is not inclined to extend the last date for submission of objections/comments on the filings of Licensees.” It has further stated that “in addition to submission of objections/comments, the stakeholders can also submit their objections/comments in the scheduled public hearings. The Commission recognizes the contribution of the submissions of knowledgeable and interested stakeholders and the same will be considered.” Since the Hon’ble Commission has not responded to the reasons given by us in support of our requests, we are constrained to come to the conclusion that it is inclined to complete the entire regulatory process in eight petitions within the unreasonably short period of time and issue its orders and that it has condoned the delay in filing the subject petitions. As such, we are making submissions on the petitions to the extent possible in view of the constraints of time given. | Under purview of the Honourable Commission | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | <div>TGDISCOMs have submitted the following projections for their distribution business for the 5th control period:</div> <table><thead><tr><th></th><th>2024-25</th><th>2025-26</th><th>2026-27</th><th>2027-28</th><th>2028-29</th></tr></thead><tbody><tr><td>SPDCL:</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Total capex</td><td>4,794</td><td>5,785</td><td>7.194</td><td>7,180</td><td>7,504</td></tr><tr><td>ARR (Rs.crore)</td><td>5,663</td><td>6,525</td><td>8,415</td><td>9,750</td><td>11,166</td></tr><tr><td>Contracted capacity (MVA)</td><td>3,788</td><td>3,928</td><td>4,074</td><td>4,227</td><td>4,386</td></tr><tr><td>Wheeling charges (Rs/kVA/month)</td><td>440</td><td>475</td><td>575</td><td>623</td><td>668</td></tr><tr><td>NPDCL:</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Total capex</td><td>1,584</td><td>1,947</td><td>2,887</td><td>2,667</td><td>2,731</td></tr></tbody></table> | | 2024-25 | 2025-26 | 2026-27 | 2027-28 | 2028-29 | SPDCL: | | | | | | Total capex | 4,794 | 5,785 | 7.194 | 7,180 | 7,504 | ARR (Rs.crore) | 5,663 | 6,525 | 8,415 | 9,750 | 11,166 | Contracted capacity (MVA) | 3,788 | 3,928 | 4,074 | 4,227 | 4,386 | Wheeling charges (Rs/kVA/month) | 440 | 475 | 575 | 623 | 668 | NPDCL: | | | | | | Total capex | 1,584 | 1,947 | 2,887 | 2,667 | 2,731 | No Comments |
| | 2024-25 | 2025-26 | 2026-27 | 2027-28 | 2028-29 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| SPDCL: | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| ARR (Rs.crore) | 5,663 | 6,525 | 8,415 | 9,750 | 11,166 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Wheeling charges (Rs/kVA/month) | 440 | 475 | 575 | 623 | 668 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| NPDCL: | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total capex | 1,584 | 1,947 | 2,887 | 2,667 | 2,731 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | <p>Capex (smart meters) 356 534 1,246 820 604</p> <p>ARR 3,714 4,167 5,272 5,922 6,608</p> <p>Contracted capacity 3,788 3,928 4,074 4,227 4,386</p> <p>Wheeling charges 817 884 1,078 1,168 1,255</p> <p>For NPDCL, total capex includes capex for smart meters.</p> <p>Both SPDCL and NPDCL have projected availability of surplus power, in their ARR submissions for retail supply business for the 5th control period, as given hereunder (in MU):</p> <p>SPDCL 18,232 30,635 27,106 25,195 19,315</p> <p>NPDCL 5,135 12,307 12,668 13,381 12,364</p> <p>Total 23,367 42,932 39,774 38,576 31,679</p> | |
| 3 | <p>As per the capital expenditure projected by the DISCOMs, as approved in the distribution and resource plans for the 5th control period by the Commission, compared to SPDCL's projections, the contracted capacity and capex projections of NPDCL are very much lower. However, wheeling tariffs proposed by NPDCL are almost double the projections of SPDCL. Even if higher agricultural consumption of NPDCL compared to that of SPDCL is taken into consideration, it is to be examined in comparison with capex proposed by NPDCL whether such higher wheeling charges proposed by NPDCL are justified.</p> | <p>The wheeling charges for Discoms have been computed at an aggregate level by considering Discom's aggregate revenue requirement and contracted capacities.</p> |
| 4 | <p>In view of availability of abnormal quantum of surplus power during the 5th control period, as projected by the DISCOMs, it is to be clarified whether the projected surplus power also is taken into account for the contracted capacity projected by them. If so, addition of distribution network capacity and projected capital expenditure would be unwarranted, as such a capacity would become idle.</p> | <p>The surplus power shown is due to consideration of NAAAF & 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. Telangana's power demand has been growing at rapid pace. For instance, as evident in the peak demand of Hyderabad in FY 2024-25, it has registered one of the highest power demand by any of the Indian metropolitan cities. This clearly indicates that capacity</p> |

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| | | 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. |
| 5 | In response to the query of the Hon'ble Commission, both the DISCOMs have agreed to recalculate their requirements for 90% of the capacities, as they have segregated assets for wheeling business and retail supply business in the ratio of 90:10, respectively. The Hon'ble Commission is expected to consider the revised projections submitted by the DISCOMs for their distribution business for the 5 th control period subjecting them to prudence check. As such, their projected ARR and wheeling charges should come down. | The revised projections which segregates the assets for distribution and retail supply business in the ratio of 90:10 has been submitted to the Honorable Commission for their consideration. |
| 6 | <p>The DISCOMs have proposed aggregate distribution losses and charges irrespective of the voltage level, i.e., 33 kv, 11 kv and LT, on par with inter and intra-state transmission system to mitigate financial losses and requested the Hon'ble Commission to approve the same. I request the Hon'ble Commission to examine the following points, among others:</p> <ul style="list-style-type: none"> a) Determination of aggregate distribution losses and charges irrespective of the voltage levels would increase burden of consumers drawing power at higher KV level. In other words, consumers at higher levels of KV will have to cross subsidise consumers at lower KV levels, in addition to the cross subsidy, if any, they are paying already as a part and parcel of the tariffs being determined by the Commission. b) It is an accepted principle, reality and standard practice that distribution losses and distribution costs at different levels of KV are different. That is the reason why successive Commissions have been determining different wheeling charges at different levels of KV. | <p>The proposal for moving towards uniform wheeling charges and losses similar to the systems adopted by inter state and intra state transmission system would lead to a simplified tariff structure, bring in transparency in billing process and would help in streamlining the process of grid planning going further. This would also help in improving administrative efficiency and lead to better resource allocation and lesser disputes related to undue variations in wheeling charges being levied on consumers.</p> <p>Further with distributed generation picking up pace, every consumer going further would become a</p> |

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| | <p>c) If the principle of uniformity proposed by the DISCOMs is acceptable and accepted, then, the same principle should be implemented for working out cost of service to all categories of consumers in the entire state, irrespective of the level of KV at which they are being served.</p> <p>d) The contention of the DISCOMs that notification dated 17th January, 2024, on formula for computation of wheeling charges, with the proviso that the appropriate Commission may determine the wheeling charges at different voltage levels separately, is only a suggestion by MoP, Gol, and not mandatory is untenable. The very fact that the MoP, Gol, is constrained to issue the said notification, as a matter of correction to its notification dated 10.1.2024, within one week, itself is an admission that its first notification is deficient and does not recognize the authority of the Hon'ble Commission.</p> <p>Section 79.2 of Regulation No.2 of 2023 of TGERC says: "provided further that the Wheeling Charges shall be determined separately for LT voltage, 11 kv voltage, and 33 kv voltage, as applicable." The Commission is expected to follow its Regulation, unless it is amended.</p> | <p>prosumer and voltage wise segregation for levying wheeling charges may be of very little significance.</p> <p>As part of Retail Supply Business is concerned, the losses are considered as per respective voltage levels and the CoS was arrived. However, for the Distribution business, the Uniform wheeling losses and charges are arrived which are applicable for the consumers intend to opt open access system. Hence, this proposal does not effect the retail supply consumers of the Discom.</p> |
| 7 | <p>In support of their proposal for uniform wheeling charges, the DISCOMs have contended that</p> <p>a) The roof-top solar installations are increasing at a rapid pace under Net Metering/Gross Metering/PM Surya Ghar schemes launched by Gol. As such when the consumer loads under such metering are low, the surplus power generation will flow in reverse direction to 11 kv system.</p> <p>b) B) In PM-KUSUM Comp-'C', the solar power plants of capacities 0.5 to 2 MW are coming up in 11 kv system at rapid pace. During non-agriculture loads periods, the solar power generated will flow in reverse direction to 33 kv system.</p> | <p>Intermittency of power generation prevalent with RE technologies such as solar and wind are inherent in nature due to externalities such as weather conditions, time of day, time of season etc. However, RE power projects are known for lower levelized cost of tariffs which can help Discoms in optimizing its power purchase cost, the benefits of which shall be passed on to the consumers of Discoms. Further, with Government of India's vision of increasing the share of</p> |

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| | <p>c) In PM-KUSM Comp-‘B’, Grid tied Solar pump sets, during the periods of non-operation of solar pump sets after yielding crops, the solar power generated will flow in reverse direction to 33 kv system.</p> <p>d) Reduction in the cost of the Solar Panels and rules and regulations framed by the Government are encouraging the installation of Solar power plants and is increasing rapidly and there is a possibility of reverse flow of the power from 11kv to 33 kv system.</p> <p>e) Hybrid Solar and Wind system are coming up leading to continuous generation of power and there is a possibility of Reverse flow of power during the periods of Low-loads.</p> <p>f) Battery Energy Storage System may come up under LT and 11 kv systems and there is a possibility of reverse flow of power during the periods of Low-loads from 11 kv to 33 kv system.</p> <p>g) Under the above stated conditions of distributed power generation scenarios, the Distribution Losses will increase and the Licensee will always face High Energy Losses in the Network burdening with high Network Cost.</p> <p>These are some of the issues, and there are many more problems, both technical and financial, with renewable energy, connected with intermittence and integration of RE with the grid. We had made elaborate submissions on the problems associated with RE, in our submissions made earlier on the proposals of RPPO made by the Commission and in our other submissions made earlier. Governments and the DISCOMs are not concerned with such problems and additional burdens, when long-term PPAs are entered into with developers and middle-man public utilities of the Gol like SECI and NRVNL for purchase of RE indiscriminately, and they extol the virtues of RE, international commitments given by Prime Minister Modi on adding RE, need for environmental protection, etc. What has constantly been ignored is the need for maintaining equilibrium to the</p> | <p>RE consumption in India’s consumption mix will lead to increased RE uptake going further. The Discoms have factored in all of the above scenarios as currently we are in a cusp of energy transition with more focus on sustainability. Hence, with distributed generation expected to garner pace in the medium to long run, Discoms have proposed for uniform wheeling tariffs similar to the regime adopted with intra-state and inter-state transmission systems.</p> |
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| | <p>extent technically practicable between demand curve and power mix, when entering into long-term PPAs and regulatory consents to the same are being given. When, as a result of implementing the policies of the Gol, problems with RE are arising, GoTS and its DISCOMs should demand the Gol to compensate them for the same, instead of penalizing the consumers by imposing avoidable additional burdens on them.</p> | |
| 8 | <p>DISCOMs should have submitted details of the problems that have been faced as a result of purchasing unwarranted RE under long-term PPAs during the 4th control period like backing down thermal power and paying fixed charges for the same in order to purchase high-cost and must-run RE and purchasing power at higher costs in the market to meet peak deficit as RE cannot meet it.</p> | <p>No, thermal power plants have been backed down for the drawal of power from the RE Plants under long term PPAs during the 4th Control Period. However, to meet the peak demand the Discom purchased the power from the short term sources in critical times.</p> |
| 9 | <p>GoTS, its DISCOMs and the Commission are expected to take a holistic and balanced view when entering into, or giving consents to, PPAs with new power plants, especially RE units, in order to ensure balance between demand curve and power mix to the extent technically practicable. Such an approach is imperative when targets under RPPO are determined. Interests of the state should be important and outweigh the declarations or notifications of the Gol. Availability of abnormal quantum of surplus power, unwarranted quantum of RE and the financial and technical problems associated with them are indicative of the failures of commission and omission in this regard on the part of the powers-that-be, as experience over the years has been proving.</p> | <p>The Discom has entered long term PPAs with mix of contracts including RE to optimize the power purchase cost. The surplus power are only intermittent due to variation in the Demand, seasonal factors. The Discom has sold the surplus power in the market whenever the price is more than the average variable cost of the power plants with which it has tied up agreements.</p> |
| 10 | <p>DISCOMs should have submitted consolidated and comprehensive account of their distribution business during the 4th control, giving details of expansion of network, capital cost incurred, results achieved vis a vis targets, whether they exceeded expenditure approved by the Commission, surplus power backed down and fixed charges paid therefor, etc. Similarly, they should have submitted details of their achievements or otherwise of various targets under other capex and</p> | <p>The Discoms have already filed the APRs for Distribution business upto 4th year of the 4th Control period and the Hon'ble Commission passed the order after prudence check up.</p> |

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| | <p>results thereof. Also, the DISCOMs should have submitted consolidated details of their claims for true-up or true-down for the 4th control period. Examination of all these would help examine and determine requirements for the 5th control period and issuing MYT order by the Hon'ble Commission in a realistic manner. This is all the more necessary, as, compared to growth in contracted capacity projected for the 5th control period, growth in expenditures, ARR and wheeling charges is relatively higher. So is the case, when all these factors projected are compared with those of the last year of the 4th control period, i.e., 2023-24.</p> | <p>The proposed asset additions for the 5th Control Period has been estimated on the basis of the growth in demand/sales, and the required infrastructure to support such growth in sales. Further, the Licensee submits that the proposed asset additions would be capitalized as per prevailing regulations / norms and the same will be reflected in the true-up's for the respective time period.</p> |
| 11 | <p>For smart meters, TGNPDCL has projected an expenditure of Rs.3560 crore for the 5th control period. TGSPDCL has not shown it separately. The Hon'ble Commission has already 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 replacement of existing meters with prepaid smart meters? How many consumers have consented for installation of pre-paid meters? I once again request the Hon'ble Commission to reexamine the following points, among others:</p> <p>a) This move is to be seen in the background of the so-called reforms being imposed on the states by the Modi government for privatising power sector, and in conjunction especially with privatisation of power distribution and implementation of the direct benefit transfer (DBT) scheme. Implementation of RDSS, including installation of pre-paid meters, is to benefit the private operators, who will be permitted to take up power distribution in areas of their choice, as proposed by the GoI.</p> | <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. As smart meters installation is a country wide exercise being done basis guidelines / policy measures by Ministry of Power, Government of India, it is apt that TGDIsoms budget the capital expenditure that would be incurred for smart meters installation for its 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</p> |

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| | <p>b) It is obvious that, the purpose of installing pre-paid meters is to force the consumers of power to pay in advance for power to be consumed by them, contrary to the standard practice over the decades of paying power bills monthly/bi-monthly for the power consumed by them. What is wrong with the present post-paid arrangement and what is the benefit and to whom with pre-paid arrangement under the proposed smart meters is left unexplained by its sponsors.</p> <p>c) As proposed by the GoI, private operators will be permitted to use the existing transmission and distribution networks of the DISCOMs of the government, paying some nominal rentals for carrying on their distribution business. In other words, they need not invest the amounts required for establishing their own distribution network, make arrangements for its maintenance, etc.</p> <p>d) Allowing private operators to use distribution network of the DISCOMs or rather, forcing the DISCOMs to allow private operators to use their network on lease, with DISCOMs themselves maintaining the network, is nothing but forcing the latter to lose a considerable part of their business, especially cross-subsidising component, to private operators, who get the opportunity to cherry-picking. Will the GoI apply this Tuglaquian approach to allow utilisation of such networks of private companies in this manner, for example, utilising the network of private telecom companies by others?</p> <p>e) The protagonists of pre-paid meters are arguing that pre-paid arrangement is there for cell phones. Then, why not similar arrangement for power consumption also, they ask. First, there is post-paid arrangement for cell phones and landlines. Second, under pre-paid arrangement for a specific period, there is no limit on number of calls that can be made. In the case of power consumption, consumers have to pay for the entire power they consume in a month; they are not allowed to consume any number of units of power during a specified period, pre-paying a specified amount.</p> <p>f) The DISCOMs have a grace period of one month to pay bills to generators/suppliers of power for the power supplied by them and even rebate if they pay before the grace period. Under the existing arrangement, consumers are being given a period of 14 days from the date of issuing the bill for paying their bills for power consumed by them in a month. If payment of monthly bill is delayed, exceeding the due date, penalty is being collected by the DISCOMs, besides disconnecting the service. Moreover, all the</p> | <p>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.</p> |
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| | <p>permissible expenditure and return on equity for supplying power to consumers from the point of generation to end point is being passed through in the form of tariffs to be paid by the consumers. When such is the case, why should the consumers be forced to pay in advance for power to be consumed by them under the arrangement of pre-paid meters?</p> <p>g) As per applicable Regulation, "security deposit amount shall be two months charges in case of monthly billing and 3 months charges for bi-monthly billing." In addition to collecting such a security deposit from the consumers, the DISCOMs also are collecting additional security deposit whenever the consumers exceed their contracted load. Then why should the consumers be forced to pay in advance for power to be consumed by them under the arrangement of pre-paid meters?</p> <p>h) Payment in advance for power to be consumed by the consumers is nothing but providing investment for private distribution company to purchase of power. Private distribution companies need not take loans for their working capital and they can retain the amount paid in advance by the consumers and use as they like till they have to pay for power purchased by them from generators/suppliers. In other words, private operators of distribution need not invest any amounts for developing and maintaining distribution network and for purchasing power. Arrangement of pre-paid meters is intended for bestowing this undue benefit to private operators.</p> <p>i) The works proposed to be taken up under RDSS need to be, and are being, taken up by the DISCOMs as a part and parcel of expanding, strengthening and maintaining their distribution network. For that no conditionalities, as imposed under RDSS, are required. The grant component under RDSS is a ruse to impose conditionalities like installation of pre-paid meters to ensure undue benefits to private operators of distribution of power.</p> <p>j) Whatever money the DISCOMs spend for purchasing and installing pre-paid meters is nothing but squandering public money, whether it is collected from the consumers concerned or spent from the grant under RDSS. The consumers have already spent their money for their existing meters. Forcing them to pay for pre-paid meters is nothing but imposing additional burden on them without any benefit to them.</p> <p>k) The scheme of pre-paid meters benefits their manufacturers. Experience in power sector, as elsewhere in other sectors, shows that terms and conditions of bidding can be</p> | |
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| | <p>manipulated to select bidders of their choice by the powers-that-be. Bidding procedures and terms and conditions issued by the Gol have been found to be wanting in ensuring transparency and fair play, going by the way crony capitalism is being promoted and pampered. It is reported that crony capitalists, who have been promoted and pampered by the Gol, have already entered into manufacturing of pre-paid meters.</p> <p>l) There will be practical problems to consumers for paying in advance for power to be consumed by them under the system of pre-paid meters. How much amount and how many times they have to pay in a month, keeping track of their consumption recorded in the pre-paid meter to avoid disconnection and mode of such payment will be problematic to the consumers.</p> <p>m) Under smart pre-paid meter, if a consumer does not pay after the existing balance exhausts, his service connection will be disconnected automatically. If a consumer does not pay power bill before due date under the existing post-paid arrangement, his service will be disconnected after due date. The DISCOMs are unable to disconnect service connections of offices of the government and its instrumentalities and local bodies, whatever be the reasons. Even under pre-paid meter system, there is no guarantee that the DISCOMs would not come under pressure not to disconnect services of offices of the government, its instrumentalities and local bodies for their default in paying power bills. It is ironical that, when the GoTS is failing in getting power bills paid by its offices, its instrumentalities and local bodies in time and itself failing in paying the committed subsidy to the DISCOMs in time, it is decided to install pre-paid meters to service connections of power consumers.</p> <p>n) When the GoTS is vehemently and rightly opposing the direction of the Gol for installing meters to all agricultural service connections, why are the DISCOMs moving in the direction of installing pre-paid smart meters to non-agricultural service connections?</p> <p>o) Neither the governments, nor the Central Electricity Authority, nor the DISCOMs, nor ERCs have any power to direct installation of pre-paid meters, without willingness of the consumers concerned to take the same. Section 47(5) of the Electricity Act, 2003, says, "A distribution licensee shall not be entitled to require security in pursuance of clause (a) of sub-section (1) if the person requiring the supply is prepared to take the supply through a pre-payment meter." Directions or orders of the authorities cannot override the</p> | |
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| | <p>applicable law. Has the Hon'ble Commission given its approval to the DISCOMs for procurement of pre-paid meters, and, if so, with what conditions? If consumers do not opt for pre-paid meters, what will the DISCOMs do with the pre-paid meters purchased or to be purchased by them?</p> <p>We once again request the Hon'ble Commission to examine the above-mentioned submissions, among others, and responses of the DISCOMs thereto and direct them not to proceed with implementation of installation of pre-paid meters to service connections of consumers of power in the state, without the consumers opting for the same.</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> |
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Replies to the Objections/Suggestions raised on Distribution Business ARR & Wheeling Tariff Proposals for 5th Control Period by Sri Suresh Kumar Singhal, President of FTCCI Federation House, Federation Marg, # 11-6-841, Red Hills, Hyderabad-500004.

| S.No. | Summary of Objections / Suggestions | Response of the Licensee |
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| 1 | The instant petitions have been filed by TG discoms for the determination of ARR & Wheeling Tariffs for Distribution Business for FY 2024-29 and determination of ARR for Retail Supply Business for FY 2024-29 & Tariff Proposals for FY 2024-25. The instant petition has been filed by both the discoms under the Telangana State Electricity Regulatory Commission (Multi Year Tariff) Regulation, 2023 (MYT Regulations 2023). | Noted. |
| 2 | <p>Multi-year Tariff for FY 2024-29 – Regulation 6 of the TSERC (Multi Year Tariff) Regulation, 2023 provides for the filing of the MYT petition by 30th November. The relevant extracts of the same are reproduced as under:</p> <p><i>“6 Procedure for filing Petition</i></p> <p><i>6.2 The petitions to be filed for each Control Period under this Regulation area under:</i></p> <p><i>b) Multi Year Tariff petition shall be filed by 30th November of the year preceding the first year of the Control Period by transmission licensee, distribution licensee (for wheeling business) and SLDC comprising:</i></p> <p><i>i. True-up of preceding year;</i></p> <p><i>ii. Aggregate Revenue Requirement for each year of the Control Period;</i></p> <p><i>iii. Proposal of Tariff and Charges for each year of the Control Period.</i></p> <p><i>c) Multi Year Tariff petition shall be filed by 30th November of the year preceding the first year of the Control Period by distribution licensee (for retail supply business) comprising:</i></p> <p><i>i. True-up of preceding year;</i></p> | <p>When the Regulation No.2 of 2023 was notified on 30.12.2023, the TGDSCOMs were seeking clarifications on certain clauses of the new MYT Regulation No.2 of 2023 as there was huge impact on the financials of the DISCOMs and also there was a change in regulatory regime because of which DISCOMs needed to collect additional data for preparing the petitions, then the TGDSCOMs have initiated the process of collecting the required data from the various wings for which it took time.</p> <p>Subsequently, the Gruhajyothi Scheme was announced by the GoTG which further delayed the process of Filings of ARR. Meanwhile, Model code of conduct came into force, due to which the TGDSCOMs could not file the ARR filings. The DISCOMs have duly submitted the condonation of delay petition before the Hon'ble Commission stating these reasons.</p> <p>The filings of true up application would be filed separately along with Annual Performance Review of Distribution Business for FY 2023-24.</p> |

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| | <p><i>ii. Aggregate Revenue Requirement for each year of the Control Period;</i></p> <p><i>iii. Revenue from retail sale of electricity at existing tariffs & charges and projected revenue gap for the first year of the Control Period;</i></p> <p><i>iv. Proposal of consumer category wise retail supply tariff and charges for first year of the Control Period:</i></p> <p>Provided that the Multi Year Tariff petitions for the Control Period commencing from 01.04.2024 shall be filed by generating entity, transmission licensee, distribution licensee and SLDC on or before 31.01.2024."</p> <p>Based on the above, it is clear that the instant petition lacks on 2 fronts:</p> <p>The Licensees have not filed the application for the True up of previous year (which is FY 2022-23) for Distribution and Retail Supply business (ref Regulation 6.2(b)(i) and 6.2(c)(i) respectively).</p> <p>The Petitioner has filed the instant Petition after a prolonged delay of ~10 months (July 2024 and September 2024 respectively for Distribution and RST business)) which in the opinion of the Objector is not appropriate. The reasoning put forth by the Licensees seems to be an afterthought to cover up for the substantial delay caused at the Licensee's end.</p> <p>On account of instant filings in non-compliance of the MYT Regulations 2023, the Petitioner's submissions merit non-consideration</p> | |
| 3 | <p>The Hon'ble Commission in the Order dated 07.06.2024 in the matter of Annual Performance Review of Distribution Business for FY 2022-23 has approved a Revenue Surplus of Rs. 1736.34 crore and Rs. 2227.42 Crore for TGSPDCL and TGNPDCL respectively. The relevant extracts from such Order is as under:</p> <p><i>"4.12 RECOVERY OF REVENUE GAP/(SURPLUS)</i></p> <p><i>4.12.1 As per Clause 10.5 of Regulation 04 of 2005 the Commission directs the Applicant to include and propose the adjustment mechanism of the total approved</i></p> | <p>Clause 4.12.1 of order dated 07.06.2024 on Annual Performance Review of Distribution Business states that the adjustment mechanism of the total approved revenue surplus is to be proposed in the end of control period review petition for 4th Control Period. The last petition for 4th</p> |

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| | <p>revenue surplus for TGSPDCL for Rs. 1736.34 crore (gap of Rs.20.54 crore for FY 2019-20, surplus of Rs. 253.05 crore for FY 2020-21, surplus of Rs. 1114.66 crore for FY 2021-22 and surplus of Rs. 389.17 Crore for FY 2022-23) and revenue surplus for TGNPDCL for Rs. 2227.42 Crore (surplus of Rs.384.76 Crore for FY 2019-20, surplus of Rs. 354.02, surplus of Rs. 634.03 Crore and surplus of Rs 854.62 Crore) in its end of control period review petition for 4th control period. This Order is corrected and signed on this the 7th day of June, 2024."</p> <p>It is mentioned that the impact of Revenue Gap pertaining to the True up of FY 2019-20 to FY 2022-23 has to be passed in the Retail supply business. The Hon'ble Commission is sincerely submitted to consider the impact of True up of Distribution business in the RST for FY 2024-25</p> | Control period i.e., for FY 2023-24 is yet to be filed by TG Discoms wherein the adjustment mechanism would be provided as per directions given in the aforementioned order. |
| 4 | <p>The petitioner (TGSPDCL) has claimed asset additions to the tune of Rs. 31,589 Crore for the Control period FY 2025-29 which is significantly high compared to the actual Capital Cost capitalized by the Distribution Licensees in the previous control period (FY 2019-24). Notably, such high level of projections for Capital cost is injurious to the financial health of the Distribution licensees as non-capitalization of the projected capital cost would effectively result into the revenue surplus which is against the principles of reasonable cost recovery</p> | This issue is not pertains to TGNPDCL |

Replies to the Objections/Suggestions raised on Distribution Business ARR & Wheeling Tariff Proposals for 5th Control Period by Sri Narendra Baldwa, President of Telangana Andhra Plastics Manufactures Association, 914, 9th Floor, Raghava Ratna Towers, Chirag Ali Lane, Abids, Hyderabad -500001.

| S.No. | Summary of Objections / Suggestions | Response of the Licensee |
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| 1 | <p>TELANGANA AND ANDHRA PLASTICS MANUFACTURERS ASSOCIATION (TAAPMA) will be submitting the detailed comments / objections on the petitions filed by TG Genco and TG DISCOMs, at the time of public hearing on TG Genco 5th MYT petition and TGDISCOMs ARR and Wheeling charges for 5th MYT Period and FPT and CSS for FY 2024-25, as the time is very less for submitting the same.</p> <p>We request the Hon'ble Commission to accept our request give us the opportunity to appear in person at the Public Hearing on 21st and 23rd of October, 2024.</p> | Noted. |

Replies to the Objections/Suggestions raised on Distribution ARR & Wheeling Tariff Proposals for 5th Control Period by Sri Vinod Kumar Agarwal, General Secretary of Telangana Iron and Steel Manufactures Association (TISMA), Regd. Office: Flat No. 101, 1st Floor, Satya Sarovar Apt, Ghansi Bazar, Near High Court, Hyderabad -500002

| S.No. | Summary of Objections / Suggestions | Response of the Licensee |
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| 1 | The instant petitions have been filed by TG discoms for the determination of ARR & Wheeling Tariffs for Distribution Business for FY 2024-29 and determination of ARR for Retail Supply Business for FY 2024-29 & Tariff Proposals for FY 2024-25. The instant petition has been filed by both the discoms under the Telangana State Electricity Regulatory Commission (Multi Year Tariff) Regulation, 2023 (MYT Regulations 2023). | Noted. |
| 2 | <p>Multi-year Tariff for FY 2024-29 – Regulation 6 of the TSERC (Multi Year Tariff) Regulation, 2023 provides for the filing of the MYT petition by 30th November. The relevant extracts of the same are reproduced as under:</p> <p><i>“6 Procedure for filing Petition</i></p> <p><i>6.2 The petitions to be filed for each Control Period under this Regulation area under:</i></p> <p><i>b) Multi Year Tariff petition shall be filed by 30th November of the year preceding the first year of the Control Period by transmission licensee, distribution licensee (for wheeling business) and SLDC comprising:</i></p> <p><i>i. True-up of preceding year;</i></p> <p><i>ii. Aggregate Revenue Requirement for each year of the Control Period;</i></p> <p><i>iii. Proposal of Tariff and Charges for each year of the Control Period.</i></p> <p><i>c) Multi Year Tariff petition shall be filed by 30th November of the year preceding the first year of the Control Period by distribution licensee (for retail supply business) comprising:</i></p> <p><i>i. True-up of preceding year;</i></p> | <p>When the Regulation No.2 of 2023 was notified on 30.12.2023, the TGDSCOMs were seeking clarifications on certain clauses of the new MYT Regulation No.2 of 2023 as there was huge impact on the financials of the DISCOMs and also there was a change in regulatory regime because of which DISCOMs needed to collect additional data for preparing the petitions, then the TGDSCOMs have initiated the process of collecting the required data from the various wings for which it took time.</p> <p>Subsequently, the Gruhajyothi Scheme was announced by the GoTG which further delayed the process of Filings of ARR. Meanwhile, Model code of conduct came into force, due to which the TGDSCOMs could not file the ARR filings. The DISCOMs have duly submitted the condonation of delay petition before the Hon’ble Commission stating these reasons.</p> <p>The filings of true up application would be filed separately along with Annual Performance Review of Distribution Business for FY 2023-24.</p> |

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| | <p><i>ii. Aggregate Revenue Requirement for each year of the Control Period;</i></p> <p><i>iii. Revenue from retail sale of electricity at existing tariffs & charges and projected revenue gap for the first year of the Control Period;</i></p> <p><i>iv. Proposal of consumer category wise retail supply tariff and charges for first year of the Control Period:</i></p> <p>Provided that the Multi Year Tariff petitions for the Control Period commencing from 01.04.2024 shall be filed by generating entity, transmission licensee, distribution licensee and SLDC on or before 31.01.2024."</p> <p>Based on the above, it is clear that the instant petition lacks on 2 fronts:</p> <p>The Licensees have not filed the application for the True up of previous year (which is FY 2022-23) for Distribution and Retail Supply business (ref Regulation 6.2(b)(i) and 6.2(c)(i) respectively).</p> <p>The Petitioner has filed the instant Petition after a prolonged delay of ~10 months (July 2024 and September 2024 respectively for Distribution and RST business)) which in the opinion of the Objector is not appropriate. The reasoning put forth by the Licensees seems to be an afterthought to cover up for the substantial delay caused at the Licensee's end.</p> <p>On account of instant filings in non-compliance of the MYT Regulations 2023, the Petitioner's submissions merit non-consideration</p> | |
| 3 | <p>The Hon'ble Commission in the Order dated 07.06.2024 in the matter of Annual Performance Review of Distribution Business for FY 2022-23 has approved a Revenue Surplus of Rs. 1736.34 crore and Rs. 2227.42 Crore for TGSPDCL and TGNPDCL respectively. The relevant extracts from such Order is as under:</p> <p><i>"4.12 RECOVERY OF REVENUE GAP/(SURPLUS)</i></p> <p><i>4.12.1 As per Clause 10.5 of Regulation 04 of 2005 the Commission directs the Applicant to include and propose the adjustment mechanism of the total approved</i></p> | <p>Clause 4.12.1 of order dated 07.06.2024 on Annual Performance Review of Distribution Business states that the adjustment mechanism of the total approved revenue surplus is to be proposed in the end of control period review petition for 4th Control Period. The last petition for 4th</p> |

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| | <p>revenue surplus for TGSPDCL for Rs. 1736.34 crore (gap of Rs.20.54 crore for FY 2019-20, surplus of Rs. 253.05 crore for FY 2020-21, surplus of Rs. 1114.66 crore for FY 2021-22 and surplus of Rs. 389.17 Crore for FY 2022-23) and revenue surplus for TGNPDCL for Rs. 2227.42 Crore (surplus of Rs.384.76 Crore for FY 2019-20, surplus of Rs. 354.02, surplus of Rs. 634.03 Crore and surplus of Rs 854.62 Crore) in its end of control period review petition for 4th control period. This Order is corrected and signed on this the 7th day of June, 2024."</p> <p>It is mentioned that the impact of Revenue Gap pertaining to the True up of FY 2019-20 to FY 2022-23 has to be passed in the Retail supply business. The Hon'ble Commission is sincerely submitted to consider the impact of True up of Distribution business in the RST for FY 2024-25</p> | Control period i.e., for FY 2023-24 is yet to be filed by TG Discoms wherein the adjustment mechanism would be provided as per directions given in the aforementioned order. |
| 4 | <p>The petitioner (TGSPDCL) has claimed asset additions to the tune of Rs. 31,589 Crore for the Control period FY 2025-29 which is significantly high compared to the actual Capital Cost capitalized by the Distribution Licensees in the previous control period (FY 2019-24). Notably, such high level of projections for Capital cost is injurious to the financial health of the Distribution licensees as non-capitalization of the projected capital cost would effectively result into the revenue surplus which is against the principles of reasonable cost recovery</p> | This issue is not pertains to TGNPDCL |

Replies to the Objections/Suggestions raised on Distribution ARR & Wheeling Tariff Proposals for 5th Control Period by Sri R.K. Agarwal, Chairman to Telangana Spinning and Textile Mills Association, Surya Towers, 1st Floor, Sardar Patel Road, Secunderabad – 500003.

| S.No. | Summary of Objections / Suggestions | Response of the Licensee |
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| 1 | The instant petitions have been filed by TG discoms for the determination of ARR & Wheeling Tariffs for Distribution Business for FY 2024-29 and determination of ARR for Retail Supply Business for FY 2024-29 & Tariff Proposals for FY 2024-25. The instant petition has been filed by both the discoms under the Telangana State Electricity Regulatory Commission (Multi Year Tariff) Regulation, 2023 (MYT Regulations 2023). | Noted. |
| 2 | <p>Multi-year Tariff for FY 2024-29 – Regulation 6 of the TSERC (Multi Year Tariff) Regulation, 2023 provides for the filing of the MYT petition by 30th November. The relevant extracts of the same are reproduced as under:</p> <p><i>“6 Procedure for filing Petition</i></p> <p><i>6.2 The petitions to be filed for each Control Period under this Regulation area under:</i></p> <p><i>b) Multi Year Tariff petition shall be filed by 30th November of the year preceding the first year of the Control Period by transmission licensee, distribution licensee (for wheeling business) and SLDC comprising:</i></p> <p><i>i. True-up of preceding year;</i></p> <p><i>ii. Aggregate Revenue Requirement for each year of the Control Period;</i></p> <p><i>iii. Proposal of Tariff and Charges for each year of the Control Period.</i></p> <p><i>c) Multi Year Tariff petition shall be filed by 30th November of the year preceding the first year of the Control Period by distribution licensee (for retail supply business) comprising:</i></p> <p><i>i. True-up of preceding year;</i></p> | <p>When the Regulation No.2 of 2023 was notified on 30.12.2023, the TGDSCOMs were seeking clarifications on certain clauses of the new MYT Regulation No.2 of 2023 as there was huge impact on the financials of the DISCOMs and also there was a change in regulatory regime because of which DISCOMs needed to collect additional data for preparing the petitions, then the TGDSCOMs have initiated the process of collecting the required data from the various wings for which it took time.</p> <p>Subsequently, the Gruhajyothi Scheme was announced by the GoTG which further delayed the process of Filings of ARR. Meanwhile, Model code of conduct came into force, due to which the TGDSCOMs could not file the ARR filings. The DISCOMs have duly submitted the condonation of delay petition before the Hon’ble Commission stating these reasons.</p> <p>The filings of true up application would be filed separately along with Annual Performance Review of Distribution Business for FY 2023-24.</p> |

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| | <p><i>ii. Aggregate Revenue Requirement for each year of the Control Period;</i></p> <p><i>iii. Revenue from retail sale of electricity at existing tariffs & charges and projected revenue gap for the first year of the Control Period;</i></p> <p><i>iv. Proposal of consumer category wise retail supply tariff and charges for first year of the Control Period:</i></p> <p>Provided that the Multi Year Tariff petitions for the Control Period commencing from 01.04.2024 shall be filed by generating entity, transmission licensee, distribution licensee and SLDC on or before 31.01.2024."</p> <p>Based on the above, it is clear that the instant petition lacks on 2 fronts:</p> <p>The Licensees have not filed the application for the True up of previous year (which is FY 2022-23) for Distribution and Retail Supply business (ref Regulation 6.2(b)(i) and 6.2(c)(i) respectively).</p> <p>The Petitioner has filed the instant Petition after a prolonged delay of ~10 months (July 2024 and September 2024 respectively for Distribution and RST business)) which in the opinion of the Objector is not appropriate. The reasoning put forth by the Licensees seems to be an afterthought to cover up for the substantial delay caused at the Licensee's end.</p> <p>On account of instant filings in non-compliance of the MYT Regulations 2023, the Petitioner's submissions merit non-consideration</p> | |
| 3 | <p>The Hon'ble Commission in the Order dated 07.06.2024 in the matter of Annual Performance Review of Distribution Business for FY 2022-23 has approved a Revenue Surplus of Rs. 1736.34 crore and Rs. 2227.42 Crore for TGSPDCL and TGNPDCL respectively. The relevant extracts from such Order is as under:</p> <p><i>"4.12 RECOVERY OF REVENUE GAP/(SURPLUS)</i></p> | <p>Clause 4.12.1 of order dated 07.06.2024 on Annual Performance Review of Distribution Business states that the adjustment mechanism of the total approved revenue surplus is to be proposed in the end of control period review petition for 4th Control Period. The last petition for 4th</p> |

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| | <p><i>4.12.1 As per Clause 10.5 of Regulation 04 of 2005 the Commission directs the Applicant to include and propose the adjustment mechanism of the total approved revenue surplus for TGSPDCL for Rs. 1736.34 crore (gap of Rs.20.54 crore for FY 2019-20, surplus of Rs. 253.05 crore for FY 2020-21, surplus of Rs. 1114.66 crore for FY 2021-22 and surplus of Rs. 389.17 Crore for FY 2022-23) and revenue surplus for TGNPDCL for Rs. 2227.42 Crore (surplus of Rs.384.76 Crore for FY 2019-20, surplus of Rs. 354.02, surplus of Rs. 634.03 Crore and surplus of Rs 854.62 Crore) in its end of control period review petition for 4th control period. This Order is corrected and signed on this the 7th day of June, 2024."</i></p> <p>It is mentioned that the impact of Revenue Gap pertaining to the True up of FY 2019-20 to FY 2022-23 has to be passed in the Retail supply business. The Hon'ble Commission is sincerely submitted to consider the impact of True up of Distribution business in the RST for FY 2024-25</p> | Control period i.e., for FY 2023-24 is yet to be filed by TG Discoms wherein the adjustment mechanism would be provided as per directions given in the aforementioned order. |
| 4 | The petitioner (TGSPDCL) has claimed asset additions to the tune of Rs. 31,589 Crore for the Control period FY 2025-29 which is significantly high compared to the actual Capital Cost capitalized by the Distribution Licensees in the previous control period (FY 2019-24). Notably, such high level of projections for Capital cost is injurious to the financial health of the Distribution licensees as non-capitalization of the projected capital cost would effectively result into the revenue surplus which is against the principles of reasonable cost recovery | This issue is not pertains to TGNPDCL |

Replies to the Objections/Suggestions raised on Distribution Business ARR & Wheeling Tariff Proposals for 5th Control Period by Sri S. Surya Prakash Rao, Former Director (Commercial), erstwhile APCPDCL and Former Secretary, erstwhile APERC, Flat No. 105, Ashok Chandra Enclave, 11-4-660, Redhills, Hyderabad-500004.

| S.No. | Summary of Objections / Suggestions | Response of the Licensee |
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| 1 | <p>A. Preliminary submissions</p> <p>At the outset the Discom deserves compliments for the efforts made in compiling and providing elaborate data to facilitate objective study by stakeholders. It is a matter of consolation to consumers (except HT – 33kv and above) that no tariff hike is proposed in these filings except moderate increase in Fixed / Demand Charges.</p> <p>However, Hon'ble Commission may have to take a view whether it is desirable to allow tariff revision at this stage considering the following aspects:</p> <p>a). The filings are made after 6 months of the Financial Year. The Commission has to follow elaborate process to conduct the proceedings as required u/s 64 of the Electricity Act, for which around 90 days may be required though the Act allows 120 days.</p> <p>b). Discom didn't propose any substantial tariff revision for most of the consumer classes except HT consumers, for whom the proposed revision of energy charges is unreasonable and irrational as explained in para 2 hereinafter.</p> <p>c). The additional revenue expected from revised Tariff is mere Rs.1028 Crs (2.5%) out of the total Annual Revenue Requirement of Rs. 40,788 Crs for 2024-25.</p> <p>d). Bulk of this 1028 Crs, is expected from 33kv and 132 kv Industrial consumers whose sales forecast appears to have been overestimated as explained hereinafter.</p> <p>e). Revised Tariffs can take effect only prospectively after one week from the date of publication of the revised Tariffs as per Sec.26 (6) of the AP Electricity Reforms Act, 1998 read with the Electricity Act, 2003.</p> <p>f). If the effective date of new tariff is not synchronized with meter reading / billing cycle, it will cause additional work to Discoms and inconvenience to</p> | <p>The delay caused in filing of Tariff petition has been explained in the said petitions.</p> <p>In order to ensure cost recovery, the licensees have proposed to increase in tariff in light of increase of costs.</p> <p>The category wise sales fore cast is based on the CAGR as was illustrated in the petitions.</p> |

| | <p>consumers.</p> <p>g). Any attempt to compress the schedule for determination of tariff may send wrong signals to the stakeholders of power sector.</p> | | | | | | | | | | | | | | | | | | | | | | | | | |
|---------|---|---|-------------|------------|---------|------|--|---------|------|------|---------|------|---------|---------|------|----------|---------|------|-------------|---------|------|-------------|---------|------|-----|------------------------------------|
| B - 1 | <p>The Discom considered growth rate of 17. 68 % for 33kv Industrial-General (HT-I(A)) consumption on the basis of 3 yrs average, which was reported as follows (para 3.1.2)</p> <table> <tr> <th>Year</th><th>sales in MU</th><th>growth (%)</th></tr> <tr> <td>2017-18</td><td>3568</td><td></td></tr> <tr> <td>2018-19</td><td>4410</td><td>19 %</td></tr> <tr> <td>2019-20</td><td>4174</td><td>(-) 5 %</td></tr> <tr> <td>2020-21</td><td>3546</td><td>(-) 15 %</td></tr> <tr> <td>2021-22</td><td>4534</td><td>28 %</td></tr> <tr> <td>2022-23</td><td>5442</td><td>20 %</td></tr> <tr> <td>2023-24</td><td>5778</td><td>6 %</td></tr> </table> <p>The negative growth in 2019-20 and 2020-21 is attributable to the slump in industrial production during Covid-19 pandemic. The 3 year growth rate with ref to such negative values gives inflated growth rates.</p> <p>Similarly in the case of 132 kv Industrial consumption, the Discom adopted a growth rate of 31% on 3 year average basis. But there was negative growth of (-)20% in 2018-19 and (-) 9 %, in 2019-20, turning to the positive growth trajectory of 2.5 % in 2020-21, 41% in 2021-22, 54% in 2022-23, but only 3 % in 2023-24.</p> <p>Suggestion : Hon'ble Commission may please make appropriate correction to the growth rates of 33kv and 132kv Industrial-General category with ref to the actual consumption in the 1st half-year of 2024-25</p> | Year | sales in MU | growth (%) | 2017-18 | 3568 | | 2018-19 | 4410 | 19 % | 2019-20 | 4174 | (-) 5 % | 2020-21 | 3546 | (-) 15 % | 2021-22 | 4534 | 28 % | 2022-23 | 5442 | 20 % | 2023-24 | 5778 | 6 % | This issue not pertains to TGNPDCL |
| Year | sales in MU | growth (%) | | | | | | | | | | | | | | | | | | | | | | | | |
| 2017-18 | 3568 | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2018-19 | 4410 | 19 % | | | | | | | | | | | | | | | | | | | | | | | | |
| 2019-20 | 4174 | (-) 5 % | | | | | | | | | | | | | | | | | | | | | | | | |
| 2020-21 | 3546 | (-) 15 % | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021-22 | 4534 | 28 % | | | | | | | | | | | | | | | | | | | | | | | | |
| 2022-23 | 5442 | 20 % | | | | | | | | | | | | | | | | | | | | | | | | |
| 2023-24 | 5778 | 6 % | | | | | | | | | | | | | | | | | | | | | | | | |
| B-2 | <p>The main proposal of tariff revision in these filings is equating the energy charges of 33kv and above category Industrial-General consumers with that of 11 kv Industrial-General category and some other categories. This is unreasonable and irrational for the following reasons:</p> <p>a). The statutory guidelines u/s 61 of the Electricity Act mandate among others,</p> <p>(i). Safeguarding consumers' interest and at the same time recovery of cost of electricity in a reasonable manner</p> <p>(ii). Tariff progressively reflect the cost of supply of electricity and reduces the X-</p> | As per the clause 8.3(2) of the National Tariff policy- 2016, the Commission should notify a roadmap such that tariffs are brought within +/- 20% of Average Cost of Supply. The licensee would bring to the notice of the Hon'ble Commission that projected Average Cost of Supply for FY 2024-25 for the licensee is higher than approved Average Cost of Supply for FY 2023-24. In order to ensure cost recovery, the licensees have proposed to increase in | | | | | | | | | | | | | | | | | | | | | | | | |

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| <p>subsidies in the manner specified by the Appropriate Commission</p> <p>(iii). Appropriate Commission shall be guided by the National Electricity Policy and Tariff Policy</p> <p>b). National Electricity Policy observes that X-subsidies hide inefficiencies and should be reduced progressively and gradually.</p> <p>The Tariff Policy requires the Commissions to notify road map to bring tariffs within +/-20% of Average Cost of Supply.</p> <p>c). With the proposed increase of energy charges from Rs.7.15 to Rs.7.65 / unit for 33kv and from 6.65 to 7.65 / unit for 132 kv, the tariff for Industrial-General consumers will work out to Rs. 8.57 / unit including the component of about 92 paise per unit towards Demand Charge @ Rs. 500/Kva/ month at 75 % load factor.</p> <p>d). Cost of Supply as per filings (para 6.3.2)</p> <p>11kv Industrial-General : Rs.7.63/unit</p> <p>33kv Industrial-General : Rs. 5.64/unit</p> <p>132kv Industrial-General : Rs. 5.13/unit</p> <p>e). Thus these 33kv and 132 kv consumers will be contributing X-subsidy of about Rs.3 / unit and Rs.3.50 / unit respectively, which works to about 50% of COS for 33kv and 65% of COS for 132kv Industrial-General category consumers which is highly exorbitant and prohibitive.</p> <p>f). In these filings, the Discom proposed X-Subsidy Surcharge for Open Access consumers at Rs.1.68 / unit for 33kv and Rs. 1.58 / unit for 132kv consumers. It is unfair to charge tariff which contains X-subsidy component of Rs 3 to 3.5 / unit to its own consumers which is 100% higher compared to open access consumers.</p> <p>Suggestions :</p> <p>(i). In view of the circumstances explained by the Discom for the delay in the filings and in view of the position stated above, Hon'ble Commission may retain the existing tariffs across the board for all categories of consumers including HT.</p> <p>(ii). As the Revenue Deficit may increase marginally consequent to correction in growth rates of sale of energy under subsidizing categories, the Net Revenue Deficit (after accounting for the subsidy by State government u/s 65 of the Act)</p> | <p>tariff in light of increase of costs</p> <p>The licensee would also like to mention that the cross-subsidy surcharge has been computed as per clause 8.5 of the National Tariff Policy-2016.</p> <p>Further, the objector has mentioned about creation of regulatory asset. However, clause 8.2.2 of the National Tariff Policy-2016 mentions that under business-as-usual conditions, no regulatory asset shall be created. Moreover, as per clause 23 of Electricity (Amendment) Rules, 2024 there shall not be any gap between approved ARR and revenue from approved tariff except under natural calamity conditions. Hence the licensee is not in favor of creating a regulatory asset. Full recovery of costs incurred by the licensee through tariff will help improve its financial position, enabling licensee to provide quality and uninterrupted supply to its consumers</p> |
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| | may be treated as a Regulatory Asset and its recovery may be spread equally over the balance 4 year period of the 5 th Control Period (2025 – 29) in the interest of consumers as well as Discom. | |
| B- 3 | <p>The following broad picture emerges from the filings of the Discom for 2024-25 (figures rounded off please) :</p> <p>Energysales Sales to LT consumers : 29,903 MU (48 %) Sales to HT consumers : 25,456 MU (41 %) Energy losses : 6,677 MU (11 %) Total Energy Requirement: 62,036 MU</p> <p>Revenuesatcurrenttariffs Annual Revenue Requirement: 40,788 Crs Revenue from LT sales : 12, 716 Crs (31%) Revenue from HT sales: 21, 940 Crs (54 %) Revenue from other sources : 94 Crs Revenue Gap : (-) 5,957 Crs (15 %)</p> <p>After apportioning the energy losses between HT and LT sales, the HT categories consume about 45% of total energy and contribute 54 % of total Revenues while LT categories consume about 55% of total energy and contribute only about 31 % of total Revenues leading to revenue deficit of about 15 %.</p> <p>Cost of Supply Cost of Supply at LT : Rs. 8.62 / unit Cost of Supply at HT : Rs. 5.89 / unit Average Cost of Supply : Rs.7.37 /unit</p> <p>AverageRealisationandC-R ratio LT supply : Rs 4.25 /unit 49. 30 % HT supply : Rs. 8.90 /unit 151. 00 %</p> <p>Thus it's expedient for the Discom to sustain / improve the energy sales to subsidizing categories under HT and LT with appropriate initiatives /relaxation in terms and conditions of supply if necessary.</p> <p>Any proposal to increase tariff of these categories will be counterproductive to the objective of improving Revenues and financial health of Discoms.</p> | The sales of subsidizing categories depend on multiple factors such as nature of the industries and production cycle basis the market dynamics. Hence Discoms have no control over energy sales to Industries |

| B-4 | <p>Electrical Accidents: (items 8 and 9 under earlier Directives and item 6 and 7 under new Directives)</p> <p>The Discom stated that the root-causeanalysis was made as directed by the Commission and report submitted in its Lr.dt.22-6-2024. The Discom also stated that the awareness programs are being conducted and safety equipment is provided to the O&M staff to avoid Electrical Accidents. Discom stated that Rs.3.03 Crs, Rs.2.86 Crs and Rs.3.56 Crs was spent during 2021-22, 2022-23 and 2023-24 respectively. This is appreciable.</p> <p>In this context, it's necessary to refer to the CEA (Measures for Safety and Electricity Supply) Regulations 2010. Clause 5 the said Regulations requires Discoms to appoint Safety Officers to ensure observance of Safety Measures.</p> | <p>TGNPDCL has appointed Divisional Engineer/Technical of circles as Divisional Engineer/ Technical and Nodal safety officer to educate the employees to reduce the possibility departmental fatal/non-fatal accidents to our staff, unmanned workers and unauthorized personnel during execution of works in the field and directed to implement safety measures strictly to avoid electrical accidents and make zero accident in our TGNPDCL.</p> <p>As per the directions of the Hon'ble Commission, the DISCOMs are paying the ex-gratia to the victims, however the Commission has disallowed such expenses in the DISCOMs filing.</p> <p>The abstract of fatal electrical accidents occurred to humans and an animal, during past 4 Financial Years in TGNPDCL is as follows</p> <table><tr><th>Sl. No</th><th>Financial Year</th><th>No of Human Fatal electrical accidents</th><th>No of Animal Fatal electrical accidents</th><th>Total(Nos.)</th></tr><tr><td>1</td><td>2020-21</td><td>567</td><td>1001</td><td>1568</td></tr><tr><td>2</td><td>2021-22</td><td>539</td><td>1116</td><td>1655</td></tr><tr><td>3</td><td>2022-23</td><td>521</td><td>856</td><td>1377</td></tr><tr><td>4</td><td>2023-24</td><td>465</td><td>791</td><td>1256</td></tr><tr><td>5</td><td>2024-25 Upto September-2024</td><td>225</td><td>516</td><td>741</td></tr><tr><td colspan="2">Total</td><td>2317</td><td>4280</td><td>6591</td></tr></table> <p>From the above table, It may be inferred that number of fatal electrical accidents has come down over a period of past 4 years.</p> | Sl. No | Financial Year | No of Human Fatal electrical accidents | No of Animal Fatal electrical accidents | Total(Nos.) | 1 | 2020-21 | 567 | 1001 | 1568 | 2 | 2021-22 | 539 | 1116 | 1655 | 3 | 2022-23 | 521 | 856 | 1377 | 4 | 2023-24 | 465 | 791 | 1256 | 5 | 2024-25 Upto September-2024 | 225 | 516 | 741 | Total | | 2317 | 4280 | 6591 |
|--------|--|--|---|----------------|--|---|-------------|---|---------|-----|------|------|---|---------|-----|------|------|---|---------|-----|-----|------|---|---------|-----|-----|------|---|-----------------------------|-----|-----|-----|-------|--|------|------|------|
| Sl. No | Financial Year | No of Human Fatal electrical accidents | No of Animal Fatal electrical accidents | Total(Nos.) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | 2020-21 | 567 | 1001 | 1568 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| | | <p>This is achieved by taking up following measures by TGNPDCL.</p> <ul style="list-style-type: none"> • Conducting meeting with agricultural consumers in their fields in 'Polambata' by field Engineers and creating awareness among them to follow safety rules while operating with switch boards, starters of motors. • Conducting safety awareness programs with consumers in villages, raising height of distribution transformers where and explaining about causes of electrical accidents like substandard electrical house wiring, low quality domestic appliances, not providing earthing at houses and switch boards. • Distribution of pamphlets to consumers at more accidents prone areas. • Conducting awareness programs in schools and Colleges in Mahabubabad Circle with PPTs. Similar action is being carried out in other circles also. • Conducting PEP talk with O&M staff by Officers, AE/OP, ADE/OP, DE/OP and DE/Technical's. • All the O&M staff are provided appropriate "PPE" (Personnel Protective Equipment) i.e., Hard Hat, Gloves, Portable earthing short circuiting kits, safety shoes, insulated tools, Voltage detector, etc.. |
| | Suggestions: | TGNPDCL has appointed Divisional Engineer/Technical of circles as |

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| | <p>I suggest that Hon'ble Commission may issue Directions to the Discoms to appoint Safety Officer for each Discom if not for each Operation Circle, apart from improvement of Distribution Infrastructure already directed.</p> <p>Further , the Electrical Inspectorate under Chief Electrical Inspector to Government (CEIG) is the authority to investigate Electrical Accidents and to suggest rectifications under the scheme of the Electricity Act 2003, Hon'ble Commission may please hold joint meetings with CEIG , Discoms and Energy Department and advise the government to strengthen the Electrical Inspectorate to make out an effective action plan to reduce/avoid Electrical Accidents.</p> | <p>Divisional Engineer/ Technical and Nodal safety officer to educate the employees to reduce the possibility departmental fatal/non-fatal accidents to our staff, unmanned workers and unauthorized personnel during execution of works in the field and directed to implement safety measures strictly to avoid electrical accidents and make zero accident in our TGNPDCL.</p> |
| | <p>Pre-paid metering: (items 14 and 15)</p> <p>Hon'bleCommission directed the Discoms to replace meters of willing consumers with pre-paid metering (item 14) and also submit report on action plan for replacement of existing meters with pre-paid metering (item 15). The Discom replied that it's mandatory to replace the meters of all consumers except Agricultural by March, 2025 as per the timelines given by Ministry of Power, Government of India in its letter dated 17th August, 2021. This premise of Discom is misconceived. Apparently Discom failed to note the Commission'sview in para 6.27.2 of Tariff Order for 2022-23, which is extracted hereunder: <i>"6.27.2: The Commission has taken note of the submissions of Discoms and the objections received from various stakeholders on the proposal of mandatory pre-paid meters for all government services. As pointed by one of the stakeholders, Discoms have to obtain consent of consumer for availing supply through pre-paid meter. The relevant extract of theAct is as follows....."</i> The Discom also stated that a draft DPR is prepared at a cost of Rs. 9,803Crs to replace meters of 81 lakhs consumers other than Agricultural, and the same is to be approved by the Distribution Reforms Committee (DRC), State Cabinet, and final approval by the MOP, Government of India.</p> | <ul style="list-style-type: none"> • As per the GO MS No.1, Dt:03.01.2016, Energy (Budget) Department ,Govt. of Telangana, TGNPDCL purchased 18812 prepaid meters for installation of meters to Govt. Services and 15035 prepaid meters are fixed till today. • The Agreement of above project validity was up to July-2023 only. Further, the firms have not given willingness for extension of the above project. • In the reference F No:20/9/2019-IPDS.Gol/MoP, DT:20.07.2021 Govt. of India has conveyed new scheme for implementation of "Revamped Distribution Sector Scheme- A Reforms based Results linked Scheme" with the objective of improving the quality and reliability of power supply to |

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| <p>Objections:</p> <p>Central Government has no authority under the Electricity Act to issue instructions to Discoms to replace existing meters with pre-payment metering. The Discoms are not bound by the instructions of MOP in the said letter dated 17-8-2021.</p> <p>Central Electricity Authority (CEA) has no power under the Electricity Act to insist installation of meters with pre-payment features for all consumers in the absence of any provision for mandatory pre-payment system in the Electricity Act. Pre-payment system is optional under the Electricity Act as of now. CEA Regulations are relevant for technical and operational specifications only.</p> <p>Hence the Discoms ought to have assessed the level of willingness of consumers to switch over to pre-payment system before preparing the DPR with huge investment of about Rs.10,000 Crs, which will be a colossal waste as most of the consumers may not opt for pre-payment system and it will become a wasteful investment.</p> <p>Further, in para 6.27.3 of the said Tariff Order it is stated that Discom has already installed 26,732 pre-paid meters for government services in terms of G.O. Ms. no.1 dt 31-1-2016 and MOP Lr.dt 17-8-2021.</p> <p>Discom may please be asked to inform the latest position and whether all these meters are operational and automatic disconnection is being done through meters for non-payment by due date. If they are not operational, Hon'ble Commission may please ensure that the cost of such wasteful investment is not loaded into the consumer tariffs in ARR / Tariff filings</p> | <p>consumer. The scheme aim is to reduce AT&C losses. Smart metering is also covered under this scheme.</p> |
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Andhra Jyothi daily news paper published are port with many details on Electrical Accidents in its edition of 2nd Oct 2024 which requires due attention of all concerned officials. The press clipping is being sent along with the covering email.

The abstract of fatal electrical accidents occurred to humans and an animal, during past 4 Financial Years in TGNPDCL is as follows

| Sl. No | Financial Year | No of Human Fatal electrical accidents | No of Animal Fatal electrical accidents | Total(Nos.) |
|--------------|-----------------------------|--|---|-------------|
| 1 | 2020-21 | 567 | 1001 | 1568 |
| 2 | 2021-22 | 539 | 1116 | 1655 |
| 3 | 2022-23 | 521 | 856 | 1377 |
| 4 | 2023-24 | 465 | 791 | 1256 |
| 5 | 2024-25 Upto September-2024 | 225 | 516 | 741 |
| Total | | 2317 | 4280 | 6591 |

From the above table, It may be inferred that number of fatal electrical accidents has come down over a period of past 4 years. This is achieved by taking up following measures by TGNPDCL.

- Conducting meeting with agricultural consumers in their fields in 'Polambata' by field Engineers and creating awareness among them to follow safety rules while operating with switch boards, starters of motors.
- Conducting safety awareness programs with consumers in villages, raising height of distribution transformers where and explaining about causes of electrical accidents like

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| | | <p>substandard electrical house wiring, low quality domestic appliances, not providing earthing at houses and switch boards.</p> <ul style="list-style-type: none"> • Distribution of pamphlets to consumers at more accidents prone areas. • Conducting awareness programs in schools and Colleges in Mahabubabad Circle with PPTs. Similar action is being carried out in other circles also. • Conducting PEP talk with O&M staff by Officers, AE/OP, ADE/OP, DE/OP and DE/Technical's. <p>All the O&M staff are provided appropriate "PPE" (Personnel Protective Equipment) i.e., Hard Hat, Gloves, Portable earthing short circuiting kits, safety shoes, insulated tools, Voltage detector, etc.</p> |
| | <p>Statutory Inspection of New Lines</p> <p>As per the procedure in vogue during our time, the State government authorized Transco/ Discom to conduct Statutory Inspections for their new lines. Electrical Inspectorate was inspecting H.T consumer installations and Generating Stations.</p> <p>I am of the view that it's desirable to entrust the duty of statutory inspections</p> | <p>TGNPDCL are taking up new lines as per construction standards only and work bills are released to contractors only after thorough inspection of new lines</p> |

| | to an independent agency accredited by the Government or CEA or any other competent authority. Institutions like Institution of Engineers or Engineering Staff College of India, Hyderabad (ESCI) may be considered by the State Government. | | | | | | | | | | | | | |
|---------|---|---|--|---------------------------------------|--------------------------------------|--|-----------------------------|--------------------------------------|---|------|------|-------|------|------|
| | Periodical Inspection and Rectification of Lines Pre- monsoon inspections Normally the Discoms conduct pre-monsoon inspections as an annual feature, which mainly covers tree clearance, replacement of flashed / damaged insulators, rectifications of loose contacts at joints at cut- points etc, to avoid/ reduce interruptions of supply during ensuring monsoon season. But re-stringing of loose spans which are likely to endanger humans animals life, is not attended during these inspections. | TGNPDCL are conducting Pre-monsoon inspections as per the schedules which mainly are covers tree clearance, replacement of flashed/damaged insulators, rectifications of loose contacts at joints at cut-points etc, to avoid/reduce interruption of supply during ensuring monsoon season. | | | | | | | | | | | | |
| | Special Drive for Inspection/Rectification of Lines to prevent/reduce Electrical Accidents Hon'ble Commission may take a view whether to direct the Discoms to undertake Special Drive for Inspection and Rectification of Lines as follows from the view point of preventing accidents: Every Operation Circle may constitute sufficient number of teams for this purpose exclusively. These teams will conduct inspection of specified distributions in one week , note down the defects, procure necessary resources (men and materials) and take up the rectification work in the following week itself, and repeat the process as a fortnightly program . Discom officials may try to involve local people to identify the vulnerable points and motivate them to assist the Discom in taking up rectification work. Discom may sanction area wise schemes on the basis of rational norms instead of on actual survey of each distribution to avoid starting trouble for this Special Drive. This method of inspections / rectifications was implemented in composite AP in mid 1970s as per the instructions issued by the then Chief Engineer/Operation, SriV.S.Ganapathi Ram . It's worth trying now. | TGNPDCL has conducted several programmes like DNRD, Palle Pragathi, Pattana Pragathi, Adopted Villages for rectification of defects in network. The details of works carried out for the FY 2024-25 are as follows: <table><tr><th>Sl. No.</th><th>Restraining of loose lines (in spans)</th><th>Rectification of leaned poles (Nos.)</th><th>Laying of middle/Intermediate Poles (Nos.)</th><th>No. Of damaged poles(Nos.)</th><th>Rectification of DTR earthing (Nos.)</th></tr><tr><td>1</td><td>7123</td><td>4429</td><td>14013</td><td>5131</td><td>4945</td></tr></table> | Sl. No. | Restraining of loose lines (in spans) | Rectification of leaned poles (Nos.) | Laying of middle/Intermediate Poles (Nos.) | No. Of damaged poles(Nos.) | Rectification of DTR earthing (Nos.) | 1 | 7123 | 4429 | 14013 | 5131 | 4945 |
| Sl. No. | Restraining of loose lines (in spans) | Rectification of leaned poles (Nos.) | Laying of middle/Intermediate Poles (Nos.) | No. Of damaged poles(Nos.) | Rectification of DTR earthing (Nos.) | | | | | | | | | |
| 1 | 7123 | 4429 | 14013 | 5131 | 4945 | | | | | | | | | |

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| <p>Franchisee system at village level. Hon'ble Commission may please take a view whether to introduce Franchisee system for some vulnerable LT Distributions u/s 14 (7th proviso) for taking up maintenance functions on a pilot basis after completion of the rectifications under the proposed Special Drive or otherwise. Franchisees system was followed for some Distributions in Maharashtra a few years ago. I am not aware whether it is still being implemented successfully.</p> | <p>TGNPDCL is taking up maintenance functions on a pilot basis for completion of rectifications in system network instead of Franchisee system.</p> |
| <p>District Level Committees Sec166 (5) provides for constitution of District Level Committees by State government to review / coordinate certain aspects concerning electricity supply. I am not aware whether these committees were constituted and functional. Hon'ble Commission may advise the government to constitute the same for all districts including new districts and to coordinate with Discoms on the initiatives being taken to reduce/avoid Electrical Accidents, apart from the functions entrusted to the Committees u/s 166 (5) of the Electricity Act. Further, Hon'ble Commission may please examine whether there's need for Mandal Level / Village Level Committees and advise the State government suitably u/s 86 (2)(iii) of the Act.</p> | <p>Initiation of District level Committees in TGSDISCOMs will lead to financial burden of TGDISCOMs. Further, as per the directions of Hon'ble Commission, TGDISCOMs are conducting Inspection/ Rectification of Lines and taking measures to improve poor distribution network and also submitting the reports on planning of Programs and their Progress of rectification of Poor Distribution Infrastructure to the Hon'ble Commission. Hon'ble Commission will examine whether there's need for Mandal Level / Village Level Committees and advise the State government suitably u/s 86 (2)(iii) of the Act.</p> |
| <p>Protection against LT line faults Long back, LT breakers with relays for tripping the line were provided at the Distribution Transformer structure for LT feeder protection against earth faults. But these were withdrawn later perhaps due to inconvenience caused to consumers' consequent to frequent trippings as the incidence of earth fault is very high in LT lines for various reasons. Hon'ble Commission may please elicit the views of Academic Institutions, Manufacturers of LT breakers and CEA for a workable solution of protection for LT lines to avoid Electrical Accidents and without causing undue inconvenience to consumers due to frequent tripping. Submitted for consideration by the Hon'ble Commission in public interest before finalizing the ARR/Tariff filings of TG Discoms.</p> | <p>In order to avoid frequent trippings to consumers in LT lines the following measures are taken:</p> <ul style="list-style-type: none"> • Providing of LT spacers to LT lines. • Providing proper rating fuse wire to Distribution Transformers. <p>Providing of LT Distribution Box to Distribution Transformers on trail basis and the performance is found to be satisfactory. This will be implemented on large scale basis.</p> |

5వ నియంత్రణ కాలము యొక్క ఆర్థిక సంవత్సరాలకు (2024-25 నుండి 2028-29వరకు) రిటైల్ సప్లయి వ్యాపారము కోసము సమగ్ర ఆదాయ ఆవశ్యకత మరియు 2024-25 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి, ధరల ప్రతిపాదనలు & క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనలపై బొమ్మినేని రవీందర్ రెడ్డి, అధ్యక్షులు, తెలంగాణ కాటన్ ట్రేడర్స్ వెల్ఫేర్ అసోసియేషన్, హైదరాబాద్ గారి సూచనలు/సలహాలకు సమాధానాలు
(Cell No : 9849058032, 9849059314)

| క్రమసంఖ్య | అభ్యంతరాలు /సూచనలు | TGNPDCL - సమాధానాలు |
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| 1. | 1. తెలంగాణ రాష్ట్రంలోని జిల్లాలలో నెలకొల్పబడిన HT వినియోగ సంస్థలు / పరిశ్రమలు గరిష్టముగా వ్యవసాయ ఆధారిత రైతు సరుకుల ప్రాసెసింగ్ MSME పరిశ్రమలే. | — |
| 2. | పొరుగు రాష్ట్రాలలో వ్యవసాయ ఆధారిత పరిశ్రమల స్థాపన మరియు అభివృద్ధి కొరకు వారి విద్యుత్ డిస్ట్రిబ్యూషన్ కంపెనీలు విద్యుత్ వినియోగ స్లాబ్ రేట్లు తగ్గిస్తూ మరియు సబ్సిడీలు ఇస్తూ ప్రోత్సహించడం వలన పారిశ్రామికవేత్తలు ఇతర రాష్ట్రాలలో పరిశ్రమలు నెలకొల్పుతూ వారి రాష్ట్ర పారిశ్రామిక అభివృద్ధికి పాటుపడుతున్నారు. | ఒక రాష్ట్రం లోని విద్యుత్ వినియోగ స్లాబ్ రేట్లు ఆ రాష్ట్ర ఆర్థిక, వివిధ వనరుల లభ్యత మరియు ఆ రాష్ట్రము యొక్క ప్రభుత్వ పాలసీల పై ఆధారపడి ఉంటుంది. |
| 3. | కాలానుగుణ పర్యావరణ మార్పులతో పంట ఉత్పత్తులతో నష్టాలతో సరుకులు లేక పరిశ్రమలు పలు ఇబ్బందులను | — |

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| | ఎదుర్కొంటున్నాయి. | |
| 4. | వీటికి అదనంగా విద్యుత్ సరఫరా లో వోల్టేజీ/అంతరాయముల వలన రైతు సరుకు నాణ్యత ప్రమాణాలు తగ్గి సరుకుకు మార్కెట్లో సరైన ధరలు రక పరిశ్రమలు ఖాయిలా పడే పరిస్థితులకు చేరుకుంటున్నాయి. | ప్రస్తుతం విద్యుత్ సరఫరా లో వోల్టేజీ / అంతరాయ సమస్యలు లేకుండా నాణ్యమైన విద్యుత్ ను అన్ని వర్గాలకు సరఫరా చేయడం జరుగుతుంది. |
| 5. | ఇట్టి సంక్లిష్ట పరిస్థితులలో రాష్ట్ర విద్యుత్ డిస్ట్రిబ్యూషన్ కంపెనీలు HT పరిశ్రమల వినియోగదారులపై స్థిర చార్జీలు రూ.500/- /KW/KVA/MONTH గా విద్యుత్ చార్జీలు యూనిట్ కు రూ.7-65 లుగా మరియు సర్పార్టీ రూ.1-58 లుగా పెంచుతూ ప్రతిపాదించడము వ్యవసాయ పంటల ఆధారిత ప్రాసెసింగ్ పరిశ్రమలకు గొడ్డలి పెట్టుగా పరిణమిస్తుంది. అంతేకాక కేంద్ర రాష్ట్ర ప్రభుత్వాలు వ్యవసాయ ఉత్పత్తులు పెంచటానికి రైతులకు వ్యవసాయ ఆధారిత పరిశ్రమల అభివృద్ధి కొరకు తద్వారా గ్రామీణ యువతకు ఉపాధి అవకాశములు కల్పించడానికి వివిధ రకాల ప్రోత్సాహకాలు ప్రకటిస్తున్నాయి. కానీ విద్యుత్ డిస్ట్రిబ్యూషన్ కంపెనీలు విద్యుత్ చార్జీలను ఇబ్బడి ముబ్బడిగా పెంచుతూ HT పరిశ్రమలపై విద్యుత్ చార్జీల భారాన్ని మోపుతున్నాయి. | TGNPDCL పరిధి లో మొత్తం HT (11KV, 33KV & 132KV పైన) పరిశ్రమ వినియోగదారులలో 11KV పరిశ్రమ వినియోగదారులే 97% ఉన్నారు. ఈ 11KV పరిశ్రమ వినియోగదారులకు ఎనర్జీ చార్జీలను పెంచలేదు మరియు స్థిర చార్జీలను కేవలం 5 % పెంపును అనగా రూ.475/- నుండి రూ.500/- కు పెంచడం కొరకు ప్రతిపాదనలు చేయడం జరిగినది. క్రాస్ సబ్సిడీ సర్ చార్జీ ఓపెన్ ఆక్సిస్ ద్వారా విద్యుత్ ను వాడుకునే వినియోగదారులకు మాత్రమే వర్తిస్తుంది. |

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| | <p>కావున ఇట్టి స్థిర చార్జీలు, విద్యుత్ వినియోగ చార్జీలు మరియు సర్పార్జీలు పెంచడాన్ని తెలంగాణ కాటన్ మిల్లర్స్ అండ్ ట్రేడర్స్ వెల్ఫేర్ అసోసియేషన్ తమ తీవ్ర అభ్యంతరాన్ని తెలియచేస్తూ ప్రస్తుత చార్జీలనే యథావిధి గా కొనసాగించాలని కోరుతున్నాము.</p> | |
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5వ నియంత్రణ కాలము యొక్క ఆర్థిక సంవత్సరాలకు (2024-25 నుండి 2028-29వరకు) రిటైల్ సప్లయి వ్యాపారము కోసము సమగ్ర ఆదాయ ఆవశ్యకత మరియు 2024-25 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి, ధరల ప్రతిపాదనలు & క్రాస్ సబ్సిడీ సర్పార్టీ ప్రతిపాదనలపై మడూరి వేద ప్రకాష్ గౌరవ

ప్రధాన కార్యదర్శి, వరంగల్ ఛాంబర్ అఫ్ కామర్స్ అండ్ ఇండస్ట్రీ గారి సూచనలు/సలహాలకు సమాధానాలు

(Cell No : 9866160555, 9000292250)

| క్రమసంఖ్య | అభ్యంతరాలు /సూచనలు | TGNPDCL - సమాధానాలు |
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| 1. | 1. తెలంగాణ రాష్ట్రంలోని జిల్లాలలో నెలకొల్పబడిన HT వినియోగ సంస్థలు / పరిశ్రమలు గరిష్టముగా వ్యవసాయ ఆధారిత రైతు సరుకుల ప్రాసెసింగ్ MSME పరిశ్రమలే. | — |
| 2. | పొరుగు రాష్ట్రాలలో వ్యవసాయ ఆధారిత పరిశ్రమల స్థాపన మరియు అభివృద్ధి కొరకు వారి విద్యుత్ డిస్ట్రిబ్యూషన్ కంపెనీలు విద్యుత్ వినియోగ స్లాబ్ రేట్లు తగ్గిస్తూ మరియు సబ్సిడీలు ఇస్తూ ప్రోత్సహించడం వలన పారిశ్రామికవేత్తలు ఇతర రాష్ట్రాలలో పరిశ్రమలు నెలకొల్పుతూ వారి రాష్ట్ర పారిశ్రామిక అభివృద్ధికి పాటుపడుతున్నారు. | ఒక రాష్ట్రం లోని విద్యుత్ వినియోగ స్లాబ్ రేట్లు ఆ రాష్ట్ర ఆర్థిక, వివిధ వనరుల లభ్యత మరియు ఆ రాష్ట్రము యొక్క ప్రభుత్వ పాలసీల పై ఆధారపడి ఉంటుంది. |
| 3. | కాలానుగుణ పర్యావరణ మార్పులతో పంట ఉత్పత్తులతో నష్టాలతో సరుకులు లేక పరిశ్రమలు పలు ఇబ్బందులను | — |

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| | ఎదుర్కొంటున్నాయి. | |
| 4. | వీటికి అదనంగా విద్యుత్ సరఫరా లో వోల్టేజ్/అంతరాయముల వలన రైతు సరుకు నాణ్యత ప్రమాణాలు తగ్గి సరుకుకు మార్కెట్లో సరైన ధరలు రక పరిశ్రమలు ఖాయిలా పడే పరిస్థితులకు చేరుకుంటున్నాయి. | ప్రస్తుతం విద్యుత్ సరఫరా లో వోల్టేజ్ / అంతరాయ సమస్యలు లేకుండా నాణ్యమైన విద్యుత్ ను అన్ని వర్గాలకు సరఫరా చేయడం జరుగుతుంది. |
| 5. | ఇట్టి సంక్లిష్ట పరిస్థితులలో రాష్ట్ర విద్యుత్ డిస్ట్రిబ్యూషన్ కంపెనీలు HT పరిశ్రమల వినియోగదారులపై స్థిర చార్జీలు రూ.500/- /KW/KVA/MONTH గా విద్యుత్ చార్జీలు యూనిట్ కు రూ.7-65 లుగా మరియు సర్చార్జి రూ.1-58 లుగా పెంచుతూ ప్రతిపాదించడము వ్యవసాయ పంటల ఆధారిత ప్రాసెసింగ్ పరిశ్రమలకు గొడ్డలి పెట్టుగా పరిణమిస్తుంది. అంతేకాక కేంద్ర రాష్ట్ర ప్రభుత్వాలు వ్యవసాయ ఉత్పత్తులు పెంచటానికి రైతులకు వ్యవసాయ ఆధారిత పరిశ్రమల అభివృద్ధి కొరకు తద్వారా గ్రామీణ యువతకు ఉపాధి అవకాశములు కల్పించడానికి వివిధ రకాల ప్రోత్సాహకాలు ప్రకటిస్తున్నాయి. కానీ విద్యుత్ డిస్ట్రిబ్యూషన్ కంపెనీలు విద్యుత్ చార్జీలను ఇబ్బడి ముబ్బడిగా పెంచుతూ HT పరిశ్రమలపై విద్యుత్ చార్జీల భారాన్ని మోపుతున్నాయి. | TGNPDCL పరిధి లో మొత్తం HT (11KV, 33KV & 132KV పైన) పరిశ్రమ వినియోగదారులలో 11KV పరిశ్రమ వినియోగదారులే 97% ఉన్నారు. ఈ 11KV పరిశ్రమ వినియోగదారులకు ఎనర్జీ చార్జీలను పెంచలేదు మరియు స్థిర చార్జీలను కేవలం 5 % పెంపును అనగా రూ.475/- నుండి రూ.500/- కు పెంచడం కొరకు ప్రతిపాదనలు చేయడం జరిగినది. క్రాస్ సబ్సిడీ సర్ చార్జి ఓపెన్ ఆక్సిస్ ద్వారా విద్యుత్ ను వాడుకునే వినియోగదారులకు మాత్రమే వర్తిస్తుంది. |

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| | <p>కావున ఇట్టి స్థిర చార్జీలు, విద్యుత్ వినియోగ చార్జీలు మరియు సర్చార్జీలు పెంచడాన్ని తెలంగాణ కాటన్ మిల్లర్స్ అండ్ ట్రేడర్స్ వెల్ఫేర్ అసోసియేషన్ తమ తీవ్ర అభ్యాంతరాన్ని తెలియచేస్తూ ప్రస్తుత చార్జీలనే యథావిధి గా కొనసాగించాలని కోరుతున్నాము.</p> | |
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Replies to the Objections/Suggestions raised on Retail Supply Business ARR for 5th Control Period & FPT including Cross Subsidy Surcharge for the FY 2024-25 by Sri 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-500048

| S.No. | Summary of Objections / Suggestions | Response of the Licensee |
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| 2.1 | <p>According to Section 6.2 of Regulation 2 of 2023 Multi Year Tariff (MYT) Petition for the control period FY 2024-25 to FY 2028-29 has to be filed by 31-01-2024. The present MYT petition for 5th control period was filed on 18-09-2024, a delay of more than half year. The reasons attributed by TGDISCOMs for this delay are time taken in analysing the financial impact on the TGDISCOMs due to Gruha Jyothi Scheme and 'certain difficulties faced by the TGDISCOMs'. But the TGDISCOMs did not show anywhere in these filings the financial impact of Gruha Jyothi Scheme on the finances of TGDISCOMs. Also, nowhere 'certain difficulties' faced by the TGDISCOMs are elaborated. This gives the impression that TGDISCOMs are only following their nearly decade old practice of delayed filing of ARR and tariff proposals with scant regard to the Electricity Act, 2003 and Rules and Regulations framed under the said Act.</p> | <p>The Hon'ble Commission has accorded the approval to the TGDISCOMs to file the ARR and FPT for RSB filings on annual basis for the first year of 5th Control Period i.e., FY 2024-25 after careful consideration of the submissions made by the TGDISCOMs. When the Regulation No.2 of 2023 was notified on 30.12.2023, the TGDISCOMs were seeking clarifications on certain clauses of the new MYT Regulation No.2 of 2023 as there was huge impact on the financials of the DISCOMs and also there was a change in regulatory regime because of which DISCOMs needed to collect additional data for preparing the petitions. then the TGDISCOMs have initiated the process of collecting the required data from the various wings for which it took time. Subsequently, the Gruhajyothi Scheme was announced by the GoTG which further delayed the process of Filings of ARR. Meanwhile, Model code of conduct came into force, due to which the TGDISCOMs could not file the ARR filings. The DISCOMs have duly submitted the condonation of delay petition before the Hon'ble Commission stating these reasons</p> |
| 2.2 | <p>The Commission in its Tariff Order for the FY 2023-24 at paragraphs 1.12.2 and 1.12.3 noted the following stakeholders' observations:</p> <p>"In the integrated rating score methodology introduced by Ministry of Power for assessing the health of TSDISCOMs, one of the parameters is specific disincentives which provides for Tariff Cycle Delays in terms of timely filing of the Petitions."</p> <p>"Further, this amounts to a gross violation of Hon'ble APTEL directives in O.P.No.1 of 2011 as is reproduced below: "57..... 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</p> | <p>No comments</p> |

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| | with clause 8.1(7) of the Tariff Policy.” | |
| 2.3 | <p>The Commission in its Tariff Order for the FY 2023-24 at paragraph 1.12.7 stated its following view:</p> <p>“The Commission in order to provide consequences of delay in filing the proposals with the Commission has notified the following amendments to the Principal Regulations relating to TSDISCOMs with stringent penalties viz., the penal fee that is attracted in case of the licensee not complying with the provisions of Regulations, the rate of return on equity shall be reduced by 0.5% per month or part thereof.</p> <p>Second Amendment to the Principal Regulation No.4 of 2005 viz., Terms and Conditions for Determination of Tariff for Wheeling and Retail Sale of Electricity. [Regulation No.1 of 2022]</p> <p>ii) First Amendment to the Principal Regulation No.2 of 2016 viz., Fee [Regulation No.2 of 2022]”.</p> | The TGDISCOMs have already paid the penalties imposed by the Hon’ble Commission towards delay in filing of ARR Petitions for Retail Supply Business And Distribution Business. |
| 2.4 | Such measures are not included in Regulation 2 of 2023. To discourage delay in filing ARR and tariff proposals the above measures may be reintroduced in the new MYT Regulations. | |
| 3.1 | TGDISCOMs estimated power requirement during the FY 2024-25 to be 85,284 MU. This is 2.55% higher than power requirement projected by TGDISCOMs during the FY 2023-24, higher than 1.32% approved by the Commission but 1.66% less than actual consumption reported by TGDISCOMs during FY 2023-24. TGDISCOMs adopted different consumption growth rates for different consumer categories to arrive at power procurement requirement during FY 2024-25. Power consumption trend during FY 2023-24 is different from previous years. In the past power requirement estimated during a year by TGDISCOMs used to be higher than that projected by the Commission and the projection by the Commission used to be higher than the actual consumption. But during the FY 2023-24 power requirement estimated by the Commission (84,156 MU) was higher than that of | <p>The actual sales varies depending on many factors like variation in monsoon, temperature and industrial policies of the Government. Hence, sales are the uncontrollable factor which is recognized by the Hon’ble Commission in its MYT Regulation no. 2 of 2023.</p> <p>The DISCOMs have forecasted sales consumption by taking historical growth rates. Any deviation in actual sales as compared to approved sales, which would result in deviation of Power Purchase cost as well as revenue would be adjusted in subsequent True-up filings by the licensee.</p> |

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| | <p>TGDISCOMs (83,113 MU) and in turn actual consumption reported by TGDISCOMs (86,703 MU) was higher than that estimated by the Commission. In such circumstances when the base on which growth rates are calculated is higher there is a chance that overall power requirement will be on higher side. Hence, power requirement for FY 2024-25 arrived at by TGDISCOMs needs to closely scrutinized.</p> | |
| 3.2 | <p>According to TGDISCOMs' estimates LT domestic consumers will be using 15,758 MU during the FY 2024-25. LT domestic consumers will account for 18.48% of electricity requirement during the ensuing year. Compared to this during the FY 2023-24 LT domestic consumers accounted for 16.62% of electricity requirement. While SPDCL assumed that electricity consumption by LT domestic consumers would increase by 5.97% during FY 2024-25 NPDCL assumed 5% increase. TGDISCOMs mentioned starting of implementation of Gruha Jyothi Scheme as one of the reasons for delay in filing the present ARR and Tariff Proposals. According to their submission, "the Licensee was analysing the financial impact in the TGDISCOMs due to Gruha Jyothi Scheme which may hinder the licensee in filing the ARR & Tariff Proposals for RSB for FY 2024-25 to FY 2028-29 and Distribution Business for 5th Control Period." But in the present filings TGDISCOMs did not mention any impact of Gruha Jyothi Scheme on consumption pattern of domestic consumers. According to the Scheme rules the identified beneficiaries would become ineligible if their electricity consumption exceeds the past consumption trends or exceeds 200 units. Because of this, domestic consumers would moderate their electricity consumption. This would result in lower growth rate in electricity consumption by domestic consumers. In this background assumption of 5 to 5.97% growth rate in electricity consumption by LT domestic consumers appears to be on the higher side and the same need to be brought down.</p> | <p>The DISCOMs have forecasted sales consumption by taking historical growth rates. For LT-Domestic sales projection, DISCOMs have considered 5-year CAGR. For the Gruha Jyothi scheme consumers, the electricity is free upto 200 units of consumption. Hence, the consumers having less than 200 units of consumption may utilize upto 200 units which is free as per the declaration by the State Government. The Gruha Jyothi scheme consumers crossing 200 units of consumption is for limited period only during peak summer. Hence, the licensee has considered historical CAGR for projecting sales for most of the categories. Any deviation in actual sales as compared to approved sales, which would result in deviation of Power Purchase cost as well as revenue would be adjusted in subsequent True-up filings by the licensee.</p> |
| 3.3.1 | <p>TGDISCOMs estimated that agriculture pump sets would be consuming 20,748 MU of electricity during the FY 2024-25 accounting for 24.33% of electricity requirement in the state. While in the case of other consumer categories CAGR was applied over consumption figures of 2023-24 in the case of LT agriculture</p> | <p>In FY 2023-24 the agricultural sales have increased, due to lower than expected monsoon, leading to reduction in ground water levels. Hence, the licensee has not considered growth rates based on FY 2023-24 sales as it considers that as an anomaly. Therefore, the licensee has considered</p> |

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| | <p>CAGR was applied twice over the consumption figures of 2022-23. This is because according to TGDISCOMs submissions agriculture consumption during FY 2023-24 increased abnormally. According to these filings during FY 2023-24 LT agriculture services consumed 25,154 MU accounting for 28.04% of the electricity procured in the state. This was 40.67% higher than the estimates made by TGDISCOMs (17,881 MU) and 26.98% higher than the projections of the Commission (19,811 MU). TGDISCOMs did not provide any reasons for this abnormal consumption of electricity by LT agriculture services. In the absence of meters to the agriculture services in the past TGDISCOMs used ISI Methodology approved by the Commission for estimation of electricity consumption by agriculture pump sets. In the present filings NPDCL used 2.59% and SPDCL used 1.39% twice over 2022-23 consumption to arrive at LT agriculture consumption. During FY 2024-25 while NPDCL projected 3.94% increase in number of LT agriculture services SPDCL projected 4.38% increase. Growth rates in electricity consumption by LT agriculture services adopted by TGDISCOMs do not have any relation to increase in number of LT agriculture services during this period. Such data raises further doubts on TGDISCOMs' claims regarding electricity consumption by LT agriculture services.</p> | <p>5-year CAGR and applied it twice over FY 2022-23 agricultural sales to arrive at agricultural sales projections for FY 2024-25.</p> |
| 3.3.2 | <p>TGDISCOMs' computation of LT agriculture services' electricity consumption during FY 2023-24 needs to be subjected to detailed examination. According to their own submissions it was abnormal, and they did not provide any reasons for such abnormal figures. During FY 2023-24 LT agriculture services accounted for 28.04% of the electricity procured in the state. This is the highest percentage recorded in the recent history. This has different implications. On the one hand it helps to hide equally abnormally high T&D losses and on the other it imposes high subsidy burden on the state government as electricity supplied to LT agriculture services is free.</p> | |
| 3.3.3 | <p>One way to overcome present problems in estimation of electricity consumption by agriculture pump sets is to meter DTRs serving LT agriculture connections. But DISCOMs are avoiding this for reasons best known to them. In the past they have pointed out that financial institutions are not coming forward to finance it. Recent</p> | <p>The assessment of agricultural consumption as per the ISI methodology is being done every month.</p> <p>Under this Methodology, 3170 No.s AGL DTRs are metered.</p> |

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| | news reports indicate that TGSPDCL is going to spend more than Rs. 500 crore on HVDS DTRs for agriculture sector, which itself is questionable. But they are unwilling to mobilize a fraction of this to meter these DTRs. It is to be noted that metering DTRs serving agriculture connections will be cheaper than metering all agriculture services. | Under HVDS Scheme, 89613 No.s AGL DTRs are metered and most of the meters are defective. The DTR metering is covered under RDSS Scheme which is yet to be sanctioned. After approval of the scheme, the installation of meters will be done |
| 3.4 | TGDISCOMs projected electricity consumption by Lift Irrigations schemes during FY 2024-25 to be 2,618 MU. Compared to this estimated electricity consumption by these Lift Irrigations schemes during FY 2023-24 was 7,594 MU. TGDISCOMs in their filings noted, "Historically, LIS sales have been very erratic. So, considered same as FY 2023- 24 sales." But this is far from truth. There were reasons for this drastic decline in electricity consumption by Lift Irrigation schemes. Previously some of the pump houses of KLIS were submerged during floods and got damaged. Later, some parts of KLIS structures were damaged making them too dangerous to operate. During recent rains some pump houses of PRLIS were also got submerged, throwing them out of operation. Despite these, some parts of these Lift Irrigation components sought to be operated. TGDISCOMs need to take ground situation in to account to estimate electricity demand by these lift irrigation schemes | Historically LIS sales have been erratic. There has been a reduction in Actual LIS sales for FY 2023-24 as compared to approved. The reasons are multifold, including Monsoon seasonality etc. Hence, the licensee has considered LIS sales projections for FY 2024-25 to be same as FY 2023-24. Any deviation in actual sales as compared to approved sales, which would result in deviation of Power Purchase cost as well as revenue would be adjusted in True-up filings. |
| 3.5.1 | During the FY 2024-25 T&D losses are projected to account for 11% of the electricity requirement in the state. While it will be 11.67% in the case of NPDCL it will be 10.76% in the case of SPDCL. For the FY 2018-19 the Tripartite MoU under UDAY set the AT&C losses of TSNPDCL at 10.00% and TSSPDCL at 9.90%. AT&C losses include collection efficiency along with T&D losses. T&D loss levels should have been much less than AT&C losses. The T&D losses projected by TGDISCOMs in the ARR for FY 2024-25 are higher than the levels stipulated for the FY 2018-19 under the Tripartite UDAY - MoU. What is more according to their present filings T&D losses during FY 2023-24 stood at 14.14% of the power supplied in the state. If we take in to account 'abnormal' electricity consumption by LT agriculture services during FY 2023-24 actual T&D losses should have been much higher. It is high time the Commission takes a serious view of this phenomenon. Over the last few years TGDISCOMs | The increase in agriculture sales accounts to various factors like increase in ground water level, monsoon and crop pattern etc., The T&D loss percentages has been considered as per the approved Resource Plan and Business Plan for 5 th Control Period for FY 2024-25 to FY 2028-29. |

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| | have spent thousands of crores on T&D network in the name of improving quality of supply and bringing down T&D losses. But neither of them was realised even when consumers were subjected to higher tariffs year after year. | |
| 3.5.2 | When the estimated T&D losses are brought down to lower levels the quantum of power to be procured will also come down reducing tariff burden on the consumers. | The DISCOM is putting all efforts to reduce its losses and reach the targets set by the Honble Commission. It is expected to reduce the losses further by reduction of technical and commercial losses by vigorously conducting 11kV feeder wise energy audits and by taking necessary measures for reduction of losses in the company. |
| 3.6 | According to Demand Side Management Regulation of 2020 (Regulation 1 of 2020) Distribution Licensees shall submit a DSM plan to the Commission six months before the MYT control period and implement the same. DSM interventions are expected to bring down overall electricity consumption. We would like to know whether TGDISCOMs submitted DSM plans for the MYT control period under examination. If yes, whether it is taken in to account while estimating power procurement requirement during the FY 2024-25. | As per TSERC Regulation No.1 of 2020 (Demand Side Management), DSM Cell is formed in TGNPDCL for implementation of DSM measures. TGNPDCL has entered agreement with EESL on Dt:09.07.2024 for opting of e-Retail Partnership Model for Promotion of Energy Efficiency Appliances like LED Bulbs, BLDC Fans, Super Efficient ACs etc |
| 4.1.1 | In the case of power procurement from Marwa thermal power plant of Chhattisgarh State Power Distribution Company Limited (CSPDCL) TGDISCOMs have submitted as follows: "A judicial committee has been appointed to investigate power procurement from CSPDCL station. Hence, Power has not been scheduled from CSPDCL plant in the current control period." The terms of reference of the Commission of Inquiry include examination of power procurement from BTPS and YTPS of TGGENCO along with CSPDCL. If power has not been scheduled from CSPDCL due to judicial inquiry then the same shall also apply to BTPS and YTPS of TGGENCO. | 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. Further, energy availability from BTPS has been considered as Licensee is continuing to procure power and the same has been indicated in the approved Resource Plan. Energy availability from YTPS is expected to start from December 2024 (2 units of 800 MW) and therefore the same has been considered. |
| 4.1.2 | TGDISCOMs' ARR filings for the FY 2024-25 show that power generation from YTPS will commence from December 2024. But press reports mention Deputy Chief Minister directing TGGENCO officials to start power generation from this plant at least by next March. (The Hindu, 12-09-2024) Among other things YTPS is reported to be facing staff crunch. The Commission is requested to direct | While filing ARR for the FY 2024-25, the TGDISCOMs have considered the information received from the TGGENCO that power generation from YTPS will commence from December 2024. Now, it is under Commission purview to consider the appropriate Generation. |

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| | TGDISCOMs to come out with the actual situation at YTPS | |
| 4.2.1 | According to TGDISCOMs' ARR and Tariff filings for FY 2024-25 electricity availability will be 1,08,651 MU and dispatch will be 85,284 MU leaving a surplus of 23,367 MU. Surplus power accounts for 21.51% of the power available to the state during FY 2024-25. | The surplus power shown due to consideration of NAAAF & 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. |
| 4.2.2 | Power available to TGDISCOMs during FY 2024-25 includes short term procurement of 4,985 MU. The related question is – when 23,367 MU of surplus power is available is there need to go for short term purchase of 4,985 MU at a higher price? As TGDISCOMs are facing surplus power situation during FY 2024-25 we request the Commission not to allow short term purchases | The short term power procurement has been determined 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 is 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. |
| 4.2.3 | Power availability from Neyveli new unit I and II was included during FYs 2022-23 and 2023-24 but the same is not included under power availability during FY 2024-25. To this extent power availability during FY 2024-25 may have been under estimated. The same needs to be examined. | The energy availability for the station has not been projected in the Approved Resource Plan for the 5 th Control Period. Further, the share of TSDISCOMs from Neyveli new unit I and II was relinquished vide letter dated 29.03.2022 which was accepted by M/s NLC. Hence, the same has not been considered. |
| 4.3.1 | TGDISCOMs propose to spend Rs. 42,702 crores on power procurement during the FY 2024-25. This accounts for 73.81% of aggregate revenue requirement (ARR). Avenues shall be explored to bring down power procurement cost to reduce tariff burden on the consumers as well as budgetary support from the state government | The current power purchase cost has been determined based on existing PPAs of TGDISCOM with the various generators and the required dispatch from the various stations based on the variable demand. The Licensee shall strive to optimize and reduce power purchase cost on a best effort basis. |
| 4.3.2 | The present filings show that during FY 2024-25 TGDISCOMs would be selling 9,450 MU (NPDCL = 2,783 MU and SPDCL = 6,667 MU) of surplus power and would be receiving revenue of Rs. 2,170 crores. Average revenue from sale of this surplus power will be Rs. 2.30 per unit. This revenue from sale of surplus power is shown to bring down total power purchase costs. But this quantum of surplus power is not shown under power requirement/procurement. This surplus power to be sold in the market in the first place it needs to be purchased by DISCOMs. But its power purchase cost is not included under total power purchase cost. To that extent power purchase cost is under estimated. Consequently, ARR as well as | The revenue indicated as the sale of surplus power is net of the power purchase cost and is the difference between the average market rate and the average variable cost of the respective stations. Hence, the value indicated is the income of DISCOMs from the sale of surplus power net of power purchase cost and therefore, the same can be considered as included in the ARR. |

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| | deficit to be covered are also under estimated. Average revenue from sale of this surplus power is lower than unit variable cost from all sources. This implies that this surplus power will be sold at loss. This further implies that this whole exercise of sale of surplus power instead of reducing power purchase cost will in fact increase it. The Commission is requested to scrutinise TGDISCOMs' claims regarding sale of surplus power during the FY 2024-25 | |
| 4.3.3 | The filings for the FY 2023-24 had shown a surplus of more than 13,000 MU. But the present filings show that surplus power during the FY 2023-24 had come down to little more than 1,000 MU. At the same time 16,293 MU were procured through short term purchases during FY 2023-24 at a cost of Rs. 8,566 crores. Average cost of this short-term power procurement was Rs. 5.26 per unit. During the same time thermal power units of TGGENCO operated at below their threshold PLF. During FY 2023-24 TGGENCO units operated at PLF of 50 to 69% though threshold PLF is 85%. During this period power from some of CGS units was also procured at below their threshold PLF. Variable cost of these thermal power plants was much less than average cost at which short term power was procured. This shows that during FY 2023-24 costly power was procured even when cheaper sources were available resulting avoidable tariff burden on consumers in the state and subsidy burden on the state government. In this background we request the Commission to scrutinise TGDISCOMs' power procurement during FY 2023-24. | The short term power procurement has been determined 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 is 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. |
| 4.3.4 | The Telangana State Power Sector White Paper brought out by the State Government of Telangana has highlighted high capital costs of BTPS and YTPS. According to this White Paper capital cost of BTPS is Rs. 9.74 crore per MW while its planned capital cost was Rs. 6.75 crore per MW. Capital cost of YTPS is Rs. 8.64 crore per MW. Compared to this, according to this White Paper, capital cost of NTPC's new plant coming up at Ramagundam specifically meant for Telangana is Rs. 7.63 Crore per MW. High capital cost of these two plants is because of inordinate delay in and inefficient execution of these plants. Electricity consumers in the state shall not be burdened with inefficient execution and operation of these plants and we request the Commission to review capital costs of these | The DISCOM will abide the directions of the Hon'ble Commission |

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| | power plants. | |
| 4.3.5 | BTPS is reported to be facing serious problems in operation and maintenance of the plant due to problems in quality of machinery supplied to it by BHEL. This machinery was actually meant for a private sector company's power plant to come up in Maharashtra. As the private company failed to set up the plant the machinery was lying idle with BHEL. This machinery lying idle was used to set up BTPS. Once brought in to operation the BTPS units are facing severe problems. The BTPS units are reported to be facing so many problems similar to that of a plant that has been in operation for 10 to 15 years. In the background of the problems faced in operating the BTPS units and the questionable quality of machinery (for all practical purposes second hand machinery) supplied by BHEL its capital cost needs to be reevaluated | The DISCOM will abide the directions of the Hon'ble Commission. |
| 4.3.6 | Present filings show that Variable charges for YTPS during FY 2024-25 will be Rs. 2.54 per unit. This is the lowest variable cost among all thermal power plants of TGGENCO. The Telangana State Power Sector White Paper brought out by the State Government of Telangana pointed out that as the plant is located far away from coal mines of SCCL transport component will add to the coal cost leading to higher variable cost. It was estimated that because of this non-pit head status of this plant variable cost of power from this plant will be higher by more than one rupee per unit. Contrary to this the present filings show that variable cost of this plant will be lower than pit head power plants. While lower costs need to be welcomed as it is against the trend the same needs to be clarified | The variable charges for YTPS has been considered as per the Detailed Project Report (DPR). The DISCOM will abide the directions of the Hon'ble Commission. |
| 4.3.7 | According to the present filings variable cost of power from TGGENCO's Ramagundam – B during the FY 2024-25 will be Rs. 4.63 per unit. This is highest among all thermal power plants of TGGENCO. As it is in close proximity of coal mines its variable cost is expected to be lower. During the same period variable cost of NTPC's Ramagundam units will be Rs. 3.82 per unit. Given this experience variable cost of TGGENCO's Ramagundam – B plant has to be brought down. | The variable cost for TGGENCO's Ramagundam-B plant has been considered as per the TGGENCO ARR Filing. The DISCOM will abide the directions of the Hon'ble Commission. |

| 5.1.1 | <p>According to NPDCL filings of FY 2024-25 total arrears of Rs. 50,000 and more pending for six months as on 31-03-2024 are Rs. 11, 772.72 crore. These arrears are equal to 59.66% of ARR of FY 2023-24. According to SPDCL filings of FY 2024-25 total arrears of Rs. 50,000 and more pending for six months as on 30-09-2023 are Rs. 12, 917.60 crore. These arrears are equal to 29.81% of ARR of FY 2023-24. Both the DISCOMs are facing arrears of Rs. 24,690 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). According to SPDCL submission arrears due from state government departments stand at Rs. 8,057.85 crore accounting for 62.38% 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.</p> | <p>It is to submit that, outstanding arrears of Rs. 50,000 and more pending for six months as on 31.03.2024 in TGNPDCL is Rs. 11,772.72 Crores. In the above arrears Govt. services arrears are Rs.11346.25 Crs. which contributes to major portion (96.38%) of the outstanding arrears and remaining outstanding arrears of Rs. 426.46 Crs. Pertains to private services.</p> <p>The Govt. arrears outstanding as on 31.03.2017, and year wise demand raised and amounts received is furnished as below:</p> <table><tr><th>Year</th><th>Arrears at the beginning of the year</th><th>Demand raised during the year</th><th>Amount received during the year</th><th>Arrears Outstanding at the end of the year</th></tr><tr><td>2017-18</td><td>958.35</td><td>873.30</td><td>267.43</td><td>1564.22</td></tr><tr><td>2018-19</td><td>1564.22</td><td>1580.88</td><td>332.10</td><td>2813.00</td></tr><tr><td>2019-20</td><td>2813.00</td><td>3545.62</td><td>641.57</td><td>5717.05</td></tr><tr><td>2020-21</td><td>5717.05</td><td>3192.14</td><td>2922.60</td><td>5986.59</td></tr><tr><td>2021-22</td><td>5986.59</td><td>3378.78</td><td>2408.49</td><td>6956.88</td></tr><tr><td>2022-23</td><td>6956.88</td><td>3653.63</td><td>511.59</td><td>10098.92</td></tr><tr><td>2023-24</td><td>10098.92</td><td>2128.36</td><td>881.03</td><td>11346.25</td></tr></table> | Year | Arrears at the beginning of the year | Demand raised during the year | Amount received during the year | Arrears Outstanding at the end of the year | 2017-18 | 958.35 | 873.30 | 267.43 | 1564.22 | 2018-19 | 1564.22 | 1580.88 | 332.10 | 2813.00 | 2019-20 | 2813.00 | 3545.62 | 641.57 | 5717.05 | 2020-21 | 5717.05 | 3192.14 | 2922.60 | 5986.59 | 2021-22 | 5986.59 | 3378.78 | 2408.49 | 6956.88 | 2022-23 | 6956.88 | 3653.63 | 511.59 | 10098.92 | 2023-24 | 10098.92 | 2128.36 | 881.03 | 11346.25 |
|---------|--|--|---------------------------------|--|-------------------------------|---------------------------------|--|---------|--------|--------|--------|---------|---------|---------|---------|--------|---------|---------|---------|---------|--------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|--------|----------|---------|----------|---------|--------|----------|
| Year | Arrears at the beginning of the year | Demand raised during the year | Amount received during the year | Arrears Outstanding at the end of the year | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2017-18 | 958.35 | 873.30 | 267.43 | 1564.22 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2018-19 | 1564.22 | 1580.88 | 332.10 | 2813.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2019-20 | 2813.00 | 3545.62 | 641.57 | 5717.05 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2020-21 | 5717.05 | 3192.14 | 2922.60 | 5986.59 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021-22 | 5986.59 | 3378.78 | 2408.49 | 6956.88 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2022-23 | 6956.88 | 3653.63 | 511.59 | 10098.92 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2023-24 | 10098.92 | 2128.36 | 881.03 | 11346.25 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5.1.2 | <p>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.</p> | <p>In the above arrears (Rs.11,346.25 Crs). includes arrears outstanding on various L.I.S. for Rs. 7691.07 Crs. and arrears on H.M.W.S. services for Rs. 870.35 Crs. Mission Bhagiratha services Rs. 1,556 Crs. and remaining arrears pertains to other Govt. department services.</p> <p>For collection of Govt. arrears regular pursuance is made with respective department HODs for payment of outstanding arrears. During FY 2020-21 & 2021-22 Govt. departments has paid major portion of their C.C. bills issued during the year, but during FY 2022-23 & 2023-24 very meager payments were received from Govt. departments due to which arrears are increased during last 2 years. However, all efforts will be made to collect arrears outstanding on Govt. departments.</p> <p>For collection of arrears outstanding on private services prompt disconnection of defaulted services is being adopted in TGNPDCL on</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | <p>regular basis. But some of the H.T. consumers has filed cases at various courts due to which arrears are pending on these services. The service wise arrears list of 10 H.T. consumers is furnished below which contributes to major portion of private arrears of Rs. 426.46 Crs.</p> <table><tr><th>Sl. No.</th><th>Sc.No.</th><th>Name of the consumer</th><th>Arrears as on 31.03.2024 (in Crs.)</th><th>case pending at which court and type of arrears</th></tr><tr><td>1</td><td>MCL007</td><td>Orient cement</td><td>4.67</td><td>FSA amount, case pending at supreme court</td></tr><tr><td>2</td><td>NZB421</td><td>M/s. IVRCL BAT PASCO</td><td>3.06</td><td>High court case on Back billing</td></tr><tr><td>3</td><td>ADB247</td><td>GMR Spintex</td><td>10.83</td><td>High court case & RR Act C.C. charges arrears</td></tr><tr><td>4</td><td>MCL008</td><td>Mancherial cement</td><td>7.21</td><td>High court case RR Act C.C. charges arrears</td></tr><tr><td>5</td><td>KMM510</td><td>Madhucon sugar</td><td>20.66</td><td>High court case on Cross Subsidy Surcharge</td></tr><tr><td>6</td><td>BKM011</td><td>ITC Ltd.</td><td>69.56</td><td>High court case on Cross Subsidy Surcharge</td></tr><tr><td>7</td><td>BKM001</td><td>NAVAL Ltd.</td><td>96.26</td><td>High court case on Cross Subsidy Surcharge</td></tr><tr><td>8</td><td>KMD001</td><td>The sirpur paper mills</td><td>100.07</td><td>Arrears accumulated prior to NCLT orders</td></tr><tr><td>9</td><td>BKM049</td><td>Sri Laxmi Tulasi AGRO</td><td>8.97</td><td>High court case on Cross Subsidy Surcharge</td></tr><tr><td>10</td><td>BPL001</td><td>M/s. Ballarpur industries</td><td>8.87</td><td>NCLT case, C.C. arrears</td></tr><tr><td colspan="3">Total</td><td>330.16</td><td></td></tr></table> <p>However, all efforts are being made to collect arrears on private services</p> | Sl. No. | Sc.No. | Name of the consumer | Arrears as on 31.03.2024 (in Crs.) | case pending at which court and type of arrears | 1 | MCL007 | Orient cement | 4.67 | FSA amount, case pending at supreme court | 2 | NZB421 | M/s. IVRCL BAT PASCO | 3.06 | High court case on Back billing | 3 | ADB247 | GMR Spintex | 10.83 | High court case & RR Act C.C. charges arrears | 4 | MCL008 | Mancherial cement | 7.21 | High court case RR Act C.C. charges arrears | 5 | KMM510 | Madhucon sugar | 20.66 | High court case on Cross Subsidy Surcharge | 6 | BKM011 | ITC Ltd. | 69.56 | High court case on Cross Subsidy Surcharge | 7 | BKM001 | NAVAL Ltd. | 96.26 | High court case on Cross Subsidy Surcharge | 8 | KMD001 | The sirpur paper mills | 100.07 | Arrears accumulated prior to NCLT orders | 9 | BKM049 | Sri Laxmi Tulasi AGRO | 8.97 | High court case on Cross Subsidy Surcharge | 10 | BPL001 | M/s. Ballarpur industries | 8.87 | NCLT case, C.C. arrears | Total | | | 330.16 | |
|-----------------------------------|---|---|------------------------------------|---|----------------------|------------------------------------|---|-------------------|--------|---------------|-------|---|---|--------|----------------------|------|---------------------------------|---|--------|-------------|-------|---|---|--------|-------------------|------|---|---|--------|----------------|-------|--|---|--------|----------|-------|--|---|--------|------------|-------|--|---|--------|------------------------|--------|--|---|--------|-----------------------|------|--|----|--------|---------------------------|------|-------------------------|-------|--|--|--------|--|
| Sl. No. | Sc.No. | Name of the consumer | Arrears as on 31.03.2024 (in Crs.) | case pending at which court and type of arrears | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | MCL007 | Orient cement | 4.67 | FSA amount, case pending at supreme court | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | NZB421 | M/s. IVRCL BAT PASCO | 3.06 | High court case on Back billing | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | ADB247 | GMR Spintex | 10.83 | High court case & RR Act C.C. charges arrears | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | MCL008 | Mancherial cement | 7.21 | High court case RR Act C.C. charges arrears | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | KMM510 | Madhucon sugar | 20.66 | High court case on Cross Subsidy Surcharge | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 6 | BKM011 | ITC Ltd. | 69.56 | High court case on Cross Subsidy Surcharge | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | BKM001 | NAVAL Ltd. | 96.26 | High court case on Cross Subsidy Surcharge | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | KMD001 | The sirpur paper mills | 100.07 | Arrears accumulated prior to NCLT orders | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 9 | BKM049 | Sri Laxmi Tulasi AGRO | 8.97 | High court case on Cross Subsidy Surcharge | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 10 | BPL001 | M/s. Ballarpur industries | 8.87 | NCLT case, C.C. arrears | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | | | 330.16 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5.2.1 | <p>TGSPDCL paid compensation to consumers in 10 cases for deficiency of services as per Regulations of the Commission. Total compensation paid was Rs. 18,000. TGNPDCL did not mention the number of cases in which compensation was paid to consumers for deficiency of service. It only mentioned the amount of compensation paid. It paid Rs. 1,36,487 towards compensation to consumers. The number of cases in which compensation was paid were too few to reflect reality. Consumers in the state are being made to run from pillar to post to get the works done. For all practical purposes Standards of Performance (SoP) do not exist. They</p> | <p>No. of cases for which compensation awarded by CGRF in TGNPDCL is as follows:</p> <table><tr><th colspan="3">2022-23</th></tr><tr><th>No. of cases compensation awarded</th><th>Amount awarded</th><th>Compensation paid</th></tr><tr><td>40</td><td>136487</td><td>80670</td></tr></table> | 2022-23 | | | No. of cases compensation awarded | Amount awarded | Compensation paid | 40 | 136487 | 80670 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2022-23 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| No. of cases compensation awarded | Amount awarded | Compensation paid | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 40 | 136487 | 80670 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | exist only on paper. We request the Commission to institute a third party assessment of TGDISCOMs' claims on SoP | |
| 5.2.2 | We would like to know the number of employees of the Licensees caught red handed by Anti Corruption Bureau (ACB) of Telangana Police during the 4th Control Period. What was the action taken by TGDISCOMs against them? How many of them were reinstated? | The details of employees caught red handed by ACB officials of Telangana Police during the 4 th control period with details of reinstatement and action taken against the accused officers are herewith enclosed as Annexure-I. |
| 5.3.1 | During the FY 2023-24 the number fatal accidents involving humans stood at 644. This is one the highest number of fatal accidents in the recent past. This shows that there was not much improvement in safety measures. Unacceptable high fatal accidents are taking place in spite of huge investments in men and materials to strengthen T&D network. SPDCL filings show that out of 288 fatal accidents general public were involved in 276 fatal accidents. | |
| 5.3.2 | According to NPDCL's submission on root cause of accidents in 82 cases victims came in contact with live wires, in 52 cases victims died during repairing agriculture motors/service wires, in 14 cases victims were replacing DTR fuses, and in 10 cases victims touched snapped conductors. These instances show that there were shortcomings in operation of the DISCOM. In 120 cases victims died due to faulty domestic wiring or appliances. This indicates the need to create awareness among the general public on safety measures. SPDCL did not provide similar information. It mentioned that the relevant information was provided to the Commission. We request the Commission to direct SPDCL to make the information on root cause of accidents public. | |

| 5.3.3 | 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. | <p>The abstract of fatal electrical accidents occurred to humans and an animal, during past 4 Financial Years in TGNPDCL is as follows:</p> <table><tr><th>Sl. No</th><th>Financial Year</th><th>No of Human Fatal electrical accidents</th><th>No of Animal Fatal electrical accidents</th><th>Total(Nos.)</th></tr><tr><td>1</td><td>2020-21</td><td>567</td><td>1001</td><td>1568</td></tr><tr><td>2</td><td>2021-22</td><td>539</td><td>1116</td><td>1655</td></tr><tr><td>3</td><td>2022-23</td><td>521</td><td>856</td><td>1377</td></tr><tr><td>4</td><td>2023-24</td><td>465</td><td>791</td><td>1256</td></tr><tr><td>5</td><td>2024-25 Upto Sep-24</td><td>225</td><td>516</td><td>741</td></tr><tr><td colspan="2">Total</td><td>2317</td><td>4280</td><td>6591</td></tr></table> <p>From the above table, It may be inferred that number of fatal electrical accidents has come down over a period of past 4 years. This is achieved by taking up following measures by TGNPDCL.</p> <p>(i) TGNPDCL has appointed Divisional Engineer/Technical of circles as Divisional Engineer/ Technical and Nodal safety officer to educate the employees to reduce the possibility departmental fatal/non-fatal accidents to our staff, unmanned workers and unauthorized personnel during execution of works in the field and directed to implement safety measures strictly to avoid electrical accidents and make zero accident in our TGNPDCL</p> <p>(ii) Conducting meeting with agricultural consumers in their fields in ‘Polambata’ by field Engineers and creating awareness among them to follow safety rules while operating with switch boards, starters of motors</p> <p>(iii) Conducting safety awareness programs with consumers in villages, raising height of distribution transformers where and explaining about causes of electrical accidents like substandard electrical house wiring, low quality domestic appliances, not providing</p> | Sl. No | Financial Year | No of Human Fatal electrical accidents | No of Animal Fatal electrical accidents | Total(Nos.) | 1 | 2020-21 | 567 | 1001 | 1568 | 2 | 2021-22 | 539 | 1116 | 1655 | 3 | 2022-23 | 521 | 856 | 1377 | 4 | 2023-24 | 465 | 791 | 1256 | 5 | 2024-25 Upto Sep-24 | 225 | 516 | 741 | Total | | 2317 | 4280 | 6591 |
|--------|---|---|---|----------------|--|---|-------------|---|---------|-----|------|------|---|---------|-----|------|------|---|---------|-----|-----|------|---|---------|-----|-----|------|---|---------------------|-----|-----|-----|-------|--|------|------|------|
| Sl. No | Financial Year | No of Human Fatal electrical accidents | No of Animal Fatal electrical accidents | Total(Nos.) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | 2020-21 | 567 | 1001 | 1568 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 2021-22 | 539 | 1116 | 1655 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | 2022-23 | 521 | 856 | 1377 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | 2023-24 | 465 | 791 | 1256 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | 2024-25 Upto Sep-24 | 225 | 516 | 741 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | | 2317 | 4280 | 6591 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5.3.4 | Though the Commission is directing the DISCOMs to take preventive steps to avoid the accidents the DISCOMs appear to be not responsive. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | | <p>earthing at houses and switch boards,</p> <p>(iv) Distribution of pamphlets to consumers at more accidents prone areas.</p> <p>(v) Conducting awareness programs in schools and Colleges in Mahabubabad Circle with PPTs. Similar action is being carried out in other circles also.</p> <p>(vi) Conducting PEP talk with O&M staff by Officers, AE/OP, ADE/OP, DE/OP and DE/Technical's.</p> <p>(vii) All the O&M staff are provided appropriate "PPE" (Personnel Protective Equipment) i.e., Hard Hat, Gloves, Portable earthing short circuiting kits, safety shoes, insulated tools, Voltage detector, etc..</p> |
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Annexure-I

Statement showing the details of employees caught red handed by ACB officials of Telangana Police during the 4th control period with details of reinstatement and action taken against the accused officers

| File No. | Name of the Employee & Designation | Date of Trap by ACB Officials | Date of Suspension | Prosecution sanction orders | Date of Reinstatement | Action taken |
|-----------|---|-------------------------------|--|---|---|--|
| 1804/2019 | Shaik Nazimuddin, Ex. LI O/o AE/OP/Karakagudem | 14.06.2019 | Suspended w.e.f. 14.06.2019 and suspension orders issued on 25.06.2019. | Prosecution sanction order furnished to DG/ACB vide vide Lr.No. Dt: 01.04.2021 | Re-instated into service vide Memo.DE(EL) Dt.21-08-2021 and joined at Pinapaka Section on 23.08.2021. | |
| 3594/2019 | Shaik Sujavuddin, Ex. LI O/o.AE/Op/Town-IV/Khammam | 07-12-2019 | Suspended w.e.f. 07.12.2019 and suspension orders issued on 12.12.2019. | Signed prosecution sanction order furnished to DG/ACB vide vide Lr.No. Dt: 26.03.2021 | Re-instated in to service and joined at Karepally Section on 16.02.2022. | DE/Enq.I appointed as EO by SE/KMM. EO has issued charge sheet. The LI has filed WP 32409 of 2023 and order is received from High Court to Pril. Secretary to Govt.. A Letter from Principal Secretary to Energy Department, Telangana, Hyd received to file counter affidavit against the WP filed by the LI. |

| File No. | Name of the Employee & Designation | Date of Trap by ACB Officials | Date of Suspension | Prosecution sanction orders | Date of Reinstatement | Action taken |
|-----------|--|-------------------------------|---|--|---|--|
| 4607/2020 | Sri Bora Krishna Rao, AAE/Op/Adilabad North | 29.12.2020 | All (3) accused officers were placed under suspension w.e.f. 29.12.2020 | Prosecution sanction orders issued to DG/ACB vide Procs.dt: 04.04.2023 | Reinstated into service vide orders dt: 9.1.2023 as AAE/Tech/DO/Mulugu – Joined on 24.01.2023FN | Charge sheet filed by ACB on 16.05.2023 against 3 accused officers – The case is pending trial vide C.C.No.3/2024 On the other end, based on the fact finding report of DE/OP/Adilabad vide letter dt: 3.6.2021, the SE/QC&Enq was appointed as Enquiry Officer vide Procs dt: 28.7.2021 to conduct departmental enquiry – Show cause notices were issued to AE, AAE & LM proposing 'Major Punishment' as per Regulation 5 of D&A Regulation. |
| | Sri Ather Srinivas, AE/Comml O/o. DE/Op/Adilabad | -do- | | Prosecution sanction orders issued to DG/ACB vide Procs.dt: 04.04.2023 | Reinstated into service vide orders dt: 9.1.2023 as AE/Tech/DO/M'bad – Joined on 23.01.2023FN | |
| | Sri Dege Prakash, LM O/o. AAE/Op/Adilabad North | -do- | | Prosecution sanction orders issued to DG/ACB vide Procs.dt: 20.3.2023 | Reinstated into service vide orders dt: 18.1.2023 by SE/ADB – Joined as LM/Op/Gudihathno or on 01.02.2023FN | |

| File No. | Name of the Employee & Designation | Date of Trap by ACB Officials | Date of Suspension | Prosecution sanction orders | Date of Reinstatement | Action taken |
|-----------|---|-------------------------------|---|--|---|--|
| 4728/2021 | Sri Kasarla Raj Kumar AAE/Op/Eklaspur | 06.11.2021 AN | Placed under suspension w.e.f. 07.11.2021 | Prosecution sanction orders issued to DG/ACB vide Procs.dt: 09.03.2023 | Reinstated into service vide orders dt: 10.7.2023 as AAE/Tech/MRT&Construction/ Bhupalpally - - Joined on 13.07.2023 | The DE/Enq.II was appointed as E.O. vide proceedings dt: 20.03.2023 to conduct departmental enquiry against the AAE -- Enquiry report is due. |
| 4416/2021 | Sri Chintala Govardhan, Ex.Sub-Engineer O/o AAE/Op/Bachodu | 30.10.2021 | Suspended w.e.f. 30.10.2021AN and suspension order issued on 02.11.2021. | Signed prosecution sanction order furnished to DG/ACB vide Lr.No. Dt: 29.04.2023 | Re-instated in to service and joined at Madhira Rural on 27.07.2023. | Instructions issued to SE/KMM to initiate departmental action against the AO on 19.04.2023. DE/Enq.I appointed as EO on 15.5.23 by SE/KMM. EO has issued charge sheet on 20.6.2023. EO submitted ER to SE/KMM on 13.10.23. Action taken report on Enquiry Report is not yet received from SE/Op/Khammam. |
| 1038/2022 | Sri Tejavath Bhadrarai, Ex- DE/Op/ Yellareddy & ADE(U/s) now ADE/Comml/CO/Jangaon | 04.03.2022 | Placed under suspension w.e.f. 05.03.2022 | Prosecution sanction accorded by Discom Board and communicated to DG/ACB vide Lr.No. dt:30.08.2023 | Reinstated into service vide orders dt: 21.09.2024 as ADE/Comml/CO /Jangaon – Joined on 23.09.2024 FN. | The GM/Comml/NPDCL/Hanumakonda was appointed as an Enquiry Officer to conduct departmental enquiry under Regulation 10(2)(a) of D&A Regulations against Sri T. Bhadrarai vide Proc. Dt: 30.08.2023. The enquiry report is yet to be received. |

| File No. | Name of the Employee & Designation | Date of Trap by ACB Officials | Date of Suspension | Prosecution sanction orders | Date of Reinstatement | Action taken |
|-----------|---|-------------------------------|--|--|---|---|
| 597/2022 | Sri Potharla Sateesh LM/Op/Gundlasingaram O/o. DE/T/Hanumakonda | 11.02.2022 | Placed under suspension w.e.f. 11.02.2022 | Prosecution sanction orders issued to DG/ACB vide Procs.dt: 03.10.2023 by DE/T/HNK | Reinstated into service vide orders dt: 29.7.2023 as LM at 33/11 KV SS / NIT – Joined on 01.08.2023FN | The SE/Op/Hanumakonda has appointed the DE/Enq.1 as E.O. vide proceedings dt: 02.03.2024 to conduct departmental enquiry against the LM -- EO issued chare sheet on 6.3.2024 – Enquiry report is due. |
| 2754/2024 | Sri D. Sharath Kumar, AE/Op/Ashwaraopet | 16.05.2024 | Suspended w.e.f. 17.05.2024 AN and suspension order issued on 22.05.2024. | | Not Re-instated | Caveat petition was filed vide Caveat SR.No.3487 of 2024 on 04.06.2024 to prevent the AO in obtaining the stay against his suspension. Accused Officer was under suspension w.e.f. 17.05.2024. |
| 4800/2024 | Sri Maloth Hussain Naik, DE/Op/Station Ghanpur | 31.08.2024 | Placed under suspension w.e.f. 31.08.2024AN | No prosecution sanction orders issued | Not reinstated | Caveat filed before the Hon'ble High Court for the State of Telangana at Hyderabad vide Caveat SR No.6060/2024 dt: 25.09.2024 to prevent the accused officer in obtaining the stay against his suspension – Arrested on 31.08.2024, remanded to judicial custody on 1.9.24 and released from District Jail, KMM on 7.10.2024. |

Replies to the Objections/Suggestions raised on Retail Supply Business ARR for 5th Control Period & FPT including Cross Subsidy Surcharge for the FY 2024-25 by Sri G.R. Karunakar, Plot No.56, Lakshmi Mega Township, Ragannaguda, Abdullahpurmet, RR Dist, Hyderabad-501510.

| S.No. | Summary of Objections / Suggestions | Response of the Licensee |
|-------|---|---|
| 1 | At the outset, condonation request itself should not be considered. Paucity of time for collecting necessary information from their own departments and preparing ARR is their internal administrative inefficiency. Model code of conduct due to general elections has nothing to do with their internal official/homework | There was a change in regulatory regime because of which DISCOMs needed to collect additional data for preparing the petitions. Moreover, due to the enforcement of model code of conduct, the DISCOMs could not file the petition. The DISCOMs have duly submitted the condonation of delay petition before the Hon'ble Commission stating these reasons. |
| 2 | What is the cost of power procurement from Hyder/Thermal stations within the state? What is the cost of power purchase from other state-owned power stations and NTP? Why is there a difference? Are there any plans to make our state self-sufficient? | For FY 2024-25, requirement of 28,577 MU from TGGENCO Thermal stations at an average cost of INR 5.59 / unit, and requirement of 5,744 MU from TGGENCO Hydel stations at an average cost of INR 2.79 / unit is projected for Telangana State. Further, requirement of 32,520 MU at an average cost of INR 5.43 / unit is also projected for other thermal stations including Central Generating Stations, Sembcorp, Singareni, etc. The cost of power purchase has been determined based on the Fixed Cost and Variable Cost of the respective plants which is expected to vary depending on multitude of factors. The Licensee also strives to ensure that maximum power is procured from within the state on a best effort basis. |
| 3 | What are the reasons for failure of Sri Srisailem Hydal power generating stations? What is the cost of repairing them? When are they going to be re-commissioned?. | Under the purview of TG GENCO. |
| 4 | What is the highest and lowest cost of procurement of solar power till date? | The cost of procurement of solar power ranges from INR 2.56/ unit to INR 10.66 / unit. |
| 5 | What is the extent of land (forest or other) procured to erect solar power generating stations? | Not under the purview of DISCOM |
| 6 | What is the status of implementation of PM-KUSUM schemes A, B, and C? | Invitation of tenders is under process |
| 7 | How many houses/consumers have adopted "Surya ghar"? | No. users Registered: 55219 Nos. No. of applications submitted in PM Suryaghaportal" 4846 Nos. No. of applicationsFeasibility issued: 4846 Nos |
| 8 | What are the distribution losses in different circles? | The Distribution losses in Circles of TGNPDCL for FY 2023-24 are as follows: |

| | | | | |
|---|---|--|-----------------------------|--|
| | | Name of the Circle | Distribution Losses% | |
| | | Hanumakonda | 10.321% | |
| | | Warangal | 10.245% | |
| | | Jangaon | 10.369% | |
| | | Bhupalpally | 10.703% | |
| | | Mahabubabad | 10.651% | |
| | | Karimnagar | 10.072% | |
| | | Jagtial | 10.704% | |
| | | Peddapally | 10.306% | |
| | | Khammam | 10.149% | |
| | | Bhadradri Kothagudem | 10.813% | |
| | | Nizamabad | 10.802% | |
| | | Kamareddy | 10.857% | |
| | | Adilabad | 10.898% | |
| | | Asifabad | 10.924% | |
| | | Mancheria | 10.909% | |
| | | Nirmal | 10.914% | |
| 9 | What are the number of illegal/unauthorized domestic, industrial, and commercial power connections in various circles, and what is the action mooted? Is there any plan/programme for regularization of them? | Theft cases are booked for all illegal and tampered connections for different types of consumers. Stringent action taken such as levying penalty and arresting of consumers. | | |

| 10 | What are the dues from central and state government offices for consuming power? | <p>TGNPDCL dues from Central and State Government offices details as on 30.09.2024 is tabulated below:</p> <table> <tr> <th>Sl.No.</th><th>Description</th><th>Dues (in Crs.) as on 30.09.24</th></tr> <tr> <td>1</td><td>State Government Offices</td><td>60.36</td></tr> <tr> <td>2</td><td>Central Government Offices</td><td>01.15</td></tr> <tr> <td colspan="2">Total</td><td>61.51</td></tr> </table> | Sl.No. | Description | Dues (in Crs.) as on 30.09.24 | 1 | State Government Offices | 60.36 | 2 | Central Government Offices | 01.15 | Total | | 61.51 |
|--------------|---|--|--------|-------------|----------------------------------|---|--------------------------|-------|---|----------------------------|-------|--------------|--|--------------|
| Sl.No. | Description | Dues (in Crs.) as on 30.09.24 | | | | | | | | | | | | |
| 1 | State Government Offices | 60.36 | | | | | | | | | | | | |
| 2 | Central Government Offices | 01.15 | | | | | | | | | | | | |
| Total | | 61.51 | | | | | | | | | | | | |
| 11 | What and how much power is consumed by various departments and sections of the society who are provided power at subsidized rates and free power? What is the loss/burden? Is the state government compensating the same, and to what extent? | Category wise energy consumption is available in the petition filed by the licensee. The Government of Telangana is providing subsidy to agricultural and domestic consumers every year. Moreover, industrial and commercial consumers also cross subsidize domestic and agricultural consumers to some extent. | | | | | | | | | | | | |
| 12 | Details of subsidized power tariffs to various categories of consumers in other states. | The details of power tariffs of different States can be downloaded from the websites of respective State Distribution companies or State Electricity Regulatory Commission | | | | | | | | | | | | |
| 13 | What are the tariff rates for domestic, commercial, industrial, Agriculture sectors in various states in our country. | | | | | | | | | | | | | |
| 14 | Are there any issues to be settled with TEEA, TSPEA, TPDEDA and other artisan and contract workers? | - | | | | | | | | | | | | |

Replies to the Objections/Suggestions raised on Distribution Business ARR & Wheeling Tariff Proposals for 5th Control Period by Sri Gopinath Injeti, Chief Executive Officer to South Indian Cement Manufactures, Association, Administrative Office, 3rd Floor, 36th Square, Plot No. 481, Road No.36 Jubilee Hills, Hyderabad -500034.

| S.No. | Summary of Objections / Suggestions | Response of the Licensee |
|-------|---|---|
| 1 | The TGDSCOMS have submitted petitions for determining the ARR and Wheeling Tariffs for their Distribution Businesses for FY 2024-29, as well as for the ARR of the Retail Supply Businesses for the same period and Tariff Proposals for FY 2024-25. These petitions are filed under the Telangana State Electricity Regulatory Commission (Multi-Year Tariff) Regulation, 2023 (MYT Regulations 2023). | Noted. |
| 2 | <p>According to Regulation 6 of the TSERC (MYT Regulations 2023), Multi-Year Tariff petitions must be filed by November 30 of the year preceding the first year of the Control Period. The pertinent details include:</p> <ul style="list-style-type: none"> • Filing Requirements for Distribution Licensees: • True-up of the preceding year • Aggregate Revenue Requirement for each year of the Control Period Tariff and Charges proposal for each year of the Control Period • Filing Requirements for Retail Supply Licensees: • True-up of the preceding year • Aggregate Revenue Requirement for each year of the Control Period | <p>There was a change in regulatory regime because of which DISCOMs needed to collect additional data for preparing the petitions. Moreover, due to the enforcement of model code of conduct, the DISCOMs could not file the petition. The DISCOMs have duly submitted the condonation of delay petition before the Hon'ble Commission stating these reasons</p> <p>The filings of true up application for distribution and retail supply business would be filed separately along with Annual Performance Review of Distribution Business for FY 2023-24</p> |

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| | <ul style="list-style-type: none"> • Projected revenue gap for the first year of the Control Period • Proposal for consumer category-wise retail supply tariff and charges for the first year of the Control Period <p>The regulations stipulate that Multi-Year Tariff petitions for the Control Period starting April 1, 2024, must be filed by January 31, 2024. The current petitions fall short in two critical areas:</p> <ul style="list-style-type: none"> • The Licensees have not included the True-up application for the previous year (FY 2022-23) for both Distribution and Retail Supply (refer to Regulations 6.2(b)(i) and 6.2(c)(i)) <p>The petitions have been submitted approximately 10 months late (July 2024 and September 2024 for Distribution and Retail Supply respectively), which the Objector believes is unjustifiable. The reasons provided by the Licensees appear to be an attempt to rationalize this significant delay. Due to these non-compliant filings with the MYT Regulations 2023, the submissions from the Petitioner should not be considered.</p> | |
| 3 | In the Order dated June 7, 2024, concerning the Annual Performance Review of Distribution Business for FY 2022-23, the Hon'ble Commission approved | Clause 4.12.1 of order dated 07.06.2024 on Annual Performance Review of Distribution Business states that the adjustment mechanism of the total approved revenue surplus is to be proposed in the end of control period review petition for 4 th |

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| | <p>a Revenue Surplus of Rs. 1,736.34 crore for TGSPDCL and Rs. 2,227.42 crore for TGNPDCL. The relevant excerpt states:</p> <p>“4.12 Recovery of Revenue Gap/(Surplus)</p> <p>4.12.1 As per Clause 10.5 of Regulation 04 of 2005 the Commission directs the Applicant to include and propose the adjustment mechanism of the total approved revenue surplus for TGSPDCL for Rs. 1736.34 crore (gap of Rs. 20.54 crore for FY 2019-20, surplus of Rs. 253.05 crore for FY 2020-21, surplus of Rs. 1114.66 crore for FY 2021-22 and surplus of Rs. 389.17 crore for FY 2022-23) and revenue surplus for TGNPDCL for Rs. 2227.42 crore (surplus of Rs. 384.76 crore for FY 2019-20, surplus of Rs. 354.02, surplus of Rs. 634.03 crore and surplus of Rs 854.62 crore) in its end of control period review petition for 4th control period. This Order is corrected and signed on the 7th day of June, 2024.”</p> <p>It is emphasized that the impact of the Revenue Gap related to the True-up from FY 2019-20 to FY 2022-23 should be reflected in the Retail Supply Tariff for FY 2024-25.</p> | <p>Control Period. The last petition for 4th Control period i.e., for FY 2023-24 is yet to be filed by TG Discoms wherein the adjustment mechanism would be provided as per directions given in the aforementioned order.</p> |
| 4 | <p>TGSPDCL has projected asset additions totaling Rs. 31,589 crores for the Control Period FY 2024-29, which is considerably higher than the actual Capital Cost capitalized by the Distribution Licensees during the previous control period (FY 2019-24). Such high projections for Capital Cost may adversely affect the financial health of the Distribution Licensees, as failure to capitalize the projected costs would lead to revenue surplus, contradicting the principles of reasonable cost recovery.</p> | <p>This issue is not pertains to TGNPDCL.</p> |

Replies to the Objections/Suggestions raised on Distribution Business ARR & Wheeling Tariff Proposals for 5th Control Period by Sri Gaurav Maheshwari, Indian Energy Exchange Limited, Corporate Office, Plot No. – C001/A/1,9th Floor, Max Towers Sector 16B, Noida, UP - 201301.

| S.No. | Summary of Objections / Suggestions | Response of the Licensee |
|-------|--|--|
| 1 | The Distribution Licensees of the state of Telangana viz. Southern Power Distribution Company of Telangana Ltd. and Northern Power Distribution Company of Telangana Ltd. (hereinafter referred to as "TGSPDCL and TGNPDCL" or collectively as "Licensees" or "Petitioners" or "DISCOMs") have filed the present Petitions before the Hon'ble Telangana State Electricity Regulatory Commission (hereinafter referred to as 'Hon'ble Commission') for approval of ARR & Proposed Wheeling Tariffs for Distribution Business for 5 th Control Period (FY 2024-25 to FY 2028-29) in accordance with the provisions of TSERC Tariff Regulations. | No comment. |
| 2 | IEX is submitting its views and observations on the Tariff Petition filed by the DISCOMs in subsequent paragraphs. | No comment. |
| 3a | <p>Computation of Voltage Wise Wheeling Charges in Rs./ kVA/ hr for short term open access</p> <p>As against the submission of the Petitioner DISCOMs, the Hon'ble Commission in the past ARR and Wheeling Tariffs Order for Distribution Business for 4th Control Period (FY 2019-20 to FY 2023-24) dated 29.04.2020, has determined voltage wise wheeling charges for 11 kV, 33 kV and LT network connected consumers.</p> | No Comments |
| 3b | <p>Further, as per regulation 79.2 of the (Multi Year Tariff) Regulation, 2023, the Hon'ble Commission has specified that the wheeling charges shall be determined separately for LT voltage, 11 kV and 33 kV voltage. Relevant extract of the Regulations is provided below: <i>"79.2 The Wheeling Charges of the Distribution Licensee shall be</i></p> | Discoms have put forward this proposal, which is a suggestion (not mandatory) before the Hon'ble Commission by citing notification issued by Ministry of |

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| | <p><i>determined by the Commission on the basis of a petition for determination of Tariff filed by the Distribution Licensee:</i></p> <p><i>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:</i></p> <p><i>Provided further that the Wheeling Charges shall be determined separately for LT voltage, 11 kV voltage and 33 kV voltage, as applicable."</i></p> <p>The distribution licensee in the present Petition has claimed single wheeling charges with no voltage wise bifurcation, which does not conform to the regulations notified by the Hon'ble Commission. Further, Open Access consumers are utilizing HT network only, as they are allowed connections at 11 kV and above; therefore, levy of LT network wheeling charges on the consumers may be irrational.</p> | <p>Power, dated 10th January 2024 and notification dated 17th January 2024.</p> <p>The proposal for moving towards uniform wheeling charges and losses similar to the systems adopted by inter-state and intra-state transmission system would lead to a simplified tariff structure, bring in transparency in billing process and would help in streamlining the process of grid planning going further. This would also help in improving administrative efficiency and lead to better resource allocation and lesser disputes related to undue variations in wheeling charges being levied on consumers.</p> <p>Further with distributed generation picking up pace, every consumer going further would become a prosumer and voltage wise segregation for levying wheeling charges may be of very little significance.</p> |
| 3c | <p>Further, the above regulation also entails that the wheeling charges for short term open access shall be determined and applicable at Rupees/ kVA/ hr, however the distribution licensees have claimed wheeling charges at Rupees/ MW/ Month which is not aligned with the Regulations notified by the Hon'ble Commission</p> | <p>Discoms have proposed uniform wheeling charges across voltage levels similar to intra state and interstate transmission charges to encourage open access consumption across all voltage levels.</p> |

Replies to the Objections/Suggestions raised on Distribution Business ARR & Wheeling Tariff Proposals for 5th Control Period by M/s. K.K. Protiens Pvt Ltd, Survey No. 90 & 103, Village : Ponnari, Mandal: Tamsi, Dist: Adilabad-504001.

| S.No. | Summary of Objections / Suggestions | Response of the Licensee |
|-------|---|---|
| 1 | <p>We would like to bring to your kind knowledge that in the Billing system for industries having solar installation, the months for which the Industry has not worked/operated the billing for units consumed is billed twice (firstly deducted from units exported from solar generation and secondly as monthly minimum). For the month when the Industrial unit is not in production for whatever reason, the main consumption is less than the monthly minimum, and hence the monthly minimum is subtracted from the units generated by solar and exported to the Grid and balance carried forward, and again the monthly minimum is billed. Illustration of our Bill for Sep-24:</p> <ul style="list-style-type: none"> • CMD: 400 KVA • Consumption main: 2952 units • Monthly minimum: 16000 units • Solar export (KWH): 25356 <p>In the above, units to be billed are calculated as follows and solar carried forward: Solar carried forward: 25356 - 2952 = 22404 C/F</p> <ul style="list-style-type: none"> • Units billed: 16000 <p>We request the department to kindly look into it as follows: If the main consumption is less than the monthly minimum, all of the solar export units should be carried forward to the next month. In the above case, all 25356 units be carried forward because 16000 units, which is the monthly minimum, are being billed. The consumption main of 2952 units is included in the monthly minimum. But in the bill, you see 22404 units only are carried forward, and 2952 units are deducted from solar export, and then again, the monthly minimum of 16000 units is billed. Kindly correct the same and request you to allow all 25356 units to be carried forward.</p> <p>Sir, we came to know that on 24/10/24, there is a public hearing at Nizamabad and request you to kindly give us a chance to discuss and explain the matter there. Sir, this is a problem for all small-scale industries, and as you are well aware that industries are going through a very difficult time, we thus request you to kindly look into the matter and decide in favor of the industries.</p> | <p>As per the Regulation No.06 of 2016 issued by the Hon'ble Commission on 16.11.2016 where in it was mentioned under clause No.10.2 (d) that "The net quantum of electricity units carried over to the next Billing period; and Provided that if the quantum of electricity exported exceeds the quantum imported during the Billing Period, the excess quantum shall be carried forward to the next Billing Period as credited Units of electricity and the eligible consumer shall get a monthly minimum bill;</p> <p>Provided further that if the quantum of electricity Units imported by the Eligible Consumer during any Billing Period exceeds the quantum exported, the Distribution Licensee shall raise its invoice for the net electricity consumption after adjusting the credited Units of electricity.</p> <p>As per the above Regulation the excess export units over and above the import units during September'2024 was carry forwarded to October'2024 and monthly minimum bill was issued to the consumer. Hence the bill issued to HT SC No.ADB-185 during September'2024 is genuine and in accordance with the above Regulation.</p> |

Replies to the Objections/Suggestions raised on Retail Supply Business ARR for 5th Control Period & FPT including Cross Subsidy Surcharge for the FY 2024-25 and Distribution ARR & Wheeling Tariff Proposals for 5th Control Period by Sri Srihari Dukkhipati (Fellow – Prayas Energy Group), Unit-III A&B, Devgiri, Joshi Rail Museum Lane, Kothrud, Pune, Maharashtra- 411038.

| S.No. | Summary of Objections / Suggestions | Response of the Licensee |
|-------|---|--|
| 1 | <p>Process Suggestions</p> <p><u>Limitation of time</u></p> <p>Eight petitions are to undergo a public regulatory process in a short period of 90 days.1 Petitions were available on the website in mid-September, objections are to be filed by 11/10/2024 and public hearing is proposed in the 4th week of October and the term of the current Honourable Commission ends in end October. The relevant MYT Regulation (2 of 2023) was issued on 31/12/2023 and petitions were to be filed by 31/01/2024. From the available documents, it appears that petitions have been submitted from Jul 2024 onwards, but, after iterations including those with Hon'ble TGERC, the public process has started only in mid-September.</p> <p>Utilities have given reasons for the delay and requested to condone the delay. But it is impossible for the public to provide quality inputs to so many petitions in such a short time. Fresh petitions for FY26 are due on 30/11/2024, which is only 2 months away.</p> <p>We do hope that this is not repeated in future by the DISCOMs and in case of delay, Hon'ble TGERC would initiate Suo-motu tariff revision process, with available data. **license conditions</p> | <p>The decision to initiate Suo-moto tariff revision process lies solely with the Hon'ble Commission</p> |

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|---|--|---|
| | <p><u>Petitions</u></p> <p>Petitions are expected to be prepared as per the 2023 MYT Regulations and there are some welcome improvements. Utilities have provided spreadsheet files for supply, wires, transmission and GENCO submissions. A few observations based on a quick study:</p> <ul style="list-style-type: none"> • The DISCOM RSB & DB formats have 30+ sheets listed, but Form 15 to Form 22 are not available for TGNPDCL • There is difference in the way both DISCOMs have provided data in the ARR/FPT petition. For example, in the performance parameters, TGSP provides consolidated accident data for two years (FY23 and FY24) and gives break up across public, department staff and contract staff. TGNP gives FY23 and FY24 data separately, but does not give such a break-up. TGNP, in response to Directives (pp 96-97 of the supply petition), provides causes of electrical accidents of FY24. TGSP does not provide such data. TGNP DISCOM business petition has Additional information has Annexures, giving details of Smart metering plan for next 5 years. TGSP does not have this. | No comments |
| 2 | <p>ARR and tariff petitions of DISCOMs</p> <p><u>Power purchase – improving the energy mix</u></p> <p>Telangana power mix is heavily based on coal-based generation. Table 1 gives the proposed mix as per the TGERC Resource Plan order (dated 29/12/2023) and Table 2 is a summary based on the current DISCOM supply petitions. It can be seen that there is no proposed plan to increase the proportion of Renewable energy, as is the national trend, to address climate challenges and reduce power purchase cost.</p> <p>Table 1: Supply mix as per Resource Plan order</p> | The amount indicated as the sale of surplus power is net of the power purchase cost and is the difference between the average market rate and the average variable cost of the respective stations. Hence, the value indicated is the revenue of DISCOMs from the sale of surplus power net of power purchase cost. |

| Source | FY25 | FY29 |
|-----------|--------|----------|
| Thermal | 78% | 79% |
| Hydro | 3% | 3% |
| NCE | 19% | 18% |
| Energy MU | 96,641 | 1,03,534 |

Table 2: Supply mix as per DISCOM petitions

| Source | FY25 | FY29 |
|------------|--------|----------|
| Thermal | 72% | 71% |
| Hydro | 7% | 5% |
| NCE | 16% | 19% |
| Market | 6% | 5% |
| Energy MU | 85,235 | 1,19,060 |
| Surplus MU | 11.1% | - |
| APPC Rs/U | 5.27 | 5.62 |

There is a slight reduction in the proportion of thermal (compared to Resource plan), but that could be attributed to the market purchase. As can be seen from Table 2, the Average Power Purchase (APPC) will increase in the coming years, due to coal domination. These are projected costs, and actual cost could be higher. The projected proportion of NCE in FY29 is low at 19% against the MoP's RPPO target of 41.36% in FY29.

The proportion of thermal power would further increase if the proposed 800 MW plant at Ramagundem as a JV between GENCO and SCCL materialises. On the other hand, there have been news reports of TG renewable energy, proposing addition of 20,000 MW of RE capacity in TG by FY30

But as per the petitions, there is expected power surplus in FY25, which is 11% of dispatched energy. Petition also indicates that revenue from surplus sale in FY25 is at Rs. 2.32/Unit, much lower than the APPC. Even though no surplus is indicated in subsequent years, the reason could be the optimistic sales

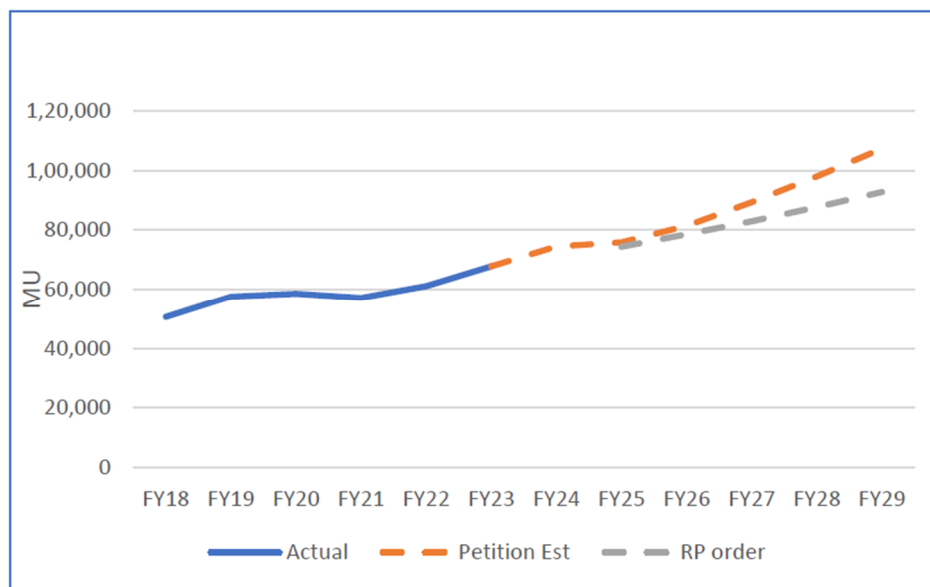
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|-----------------|---|-----------------|-------------|-------------|------|---------------|-------------|----------------|------|-----------------|-------------|-----------------|--------------|---|
| | <p>forecast. Planning for such high amounts of costly base capacity which may not be dispatched, will only add to costs.</p> <p>There is a need to revisit the power purchase plan of DISCOMs, with reasonable sales forecast (as mentioned in the next section). To optimise power purchase cost, it is good to plan for higher proportion of renewable, with required storage for grid balancing. DISCOMs should not enter into long term PPAs with any plants which are not part of an optimised Resource Plan. If needed, the current Resource Plan could be revised through a Regulatory process.</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><u>Sales forecast</u></p> <p>Sales forecast is even higher than the recently finalised Resource Plan order. During the public hearings on Resource Plan, Prayas had submitted that four major categories (LT Domestic, LT Agriculture, HT Industry and HT Commercial) drive sales and had advised close scrutiny of the forecast in these categories. The projections in the petition appear quite optimistic from Table 3, which gives the growth rate adopted for FY25 by TGSPDCL.</p> <p>Table 3: Growth rate considered by TGSPDCL for FY25</p> <table><tr><td>Category</td><td>FY25</td></tr><tr><td>LT Domestic</td><td>5.97</td></tr><tr><td>LT commercial</td><td>17.7</td></tr><tr><td>LT Agriculture</td><td>1.39</td></tr><tr><td>HT 132 kV comml</td><td>36.5</td></tr><tr><td>HT 132 Industry</td><td>30.99</td></tr></table> | Category | FY25 | LT Domestic | 5.97 | LT commercial | 17.7 | LT Agriculture | 1.39 | HT 132 kV comml | 36.5 | HT 132 Industry | 30.99 | <p>The licensees have almost achieved/exceeded the sales approved in Resource Plan for FY 2024-25 in FY 2023-24 itself. Hence the licensees have not considered sales as per resource plan for projections for 5th Control period. Moreover, the licensees have estimated sales for 5th Control period based on FY 2023-24 actual sales as compared to resource plan projections which are based on FY 2022-23 H1 actuals and H2 projections</p> <p>There is a rise in industrial and commercial activity post COVID and the licensee expects the same trend to continue in the future. Moreover, increase of IT parks/SEZ/Industries/pharma city etc. is anticipated by licensees which results in higher industrial and commercial activities. Hence, Licensees feel it is prudent to consider higher growth rates for Industrial and</p> |
| Category | FY25 | | | | | | | | | | | | | |
| LT Domestic | 5.97 | | | | | | | | | | | | | |
| LT commercial | 17.7 | | | | | | | | | | | | | |
| LT Agriculture | 1.39 | | | | | | | | | | | | | |
| HT 132 kV comml | 36.5 | | | | | | | | | | | | | |
| HT 132 Industry | 30.99 | | | | | | | | | | | | | |

| | <p>The highlighted growth rates appear quite optimistic. Figures are equally high for subsequent years also. From this petition, annual growth rates of HT Agriculture have been reduced, compared to 10%, that was considered in the Resource Plan order. The category-wise growth rates are not that high for TGNPDCL.</p> <p>NPDCL Sales: In fact, over the years, proportion of NPDCL appears to be reducing, from 30% in FY18 to 23% in FY29, as seen in Table 4. As per the Resource Plan order, this proportion is 27.5% in FY29.</p> <p>Table 4: Declining sales proportion of NPDCL</p> <table><tr><th>% Sales/Year</th><th>FY18</th><th>FY19</th><th>FY20</th><th>FY21</th><th>FY22</th><th>FY23</th><th>FY24</th><th>FY25</th><th>FY26</th><th>FY27</th><th>FY28</th><th>FY29</th></tr><tr><td>TGNPDCL</td><td>30</td><td>30</td><td>32</td><td>33</td><td>30</td><td>28</td><td>28</td><td>27</td><td>26</td><td>25</td><td>24</td><td>23</td></tr><tr><td>TGSPDCL</td><td>70</td><td>70</td><td>68</td><td>67</td><td>70</td><td>72</td><td>72</td><td>73</td><td>74</td><td>75</td><td>76</td><td>77</td></tr><tr><td>Total MU</td><td>50,562</td><td>57,538</td><td>58,522</td><td>57,049</td><td>61,154</td><td>67,791</td><td>74,442</td><td>75,895</td><td>81,409</td><td>89,331</td><td>97,932</td><td>1,07,291</td></tr></table> <p>We request DISCOMs to provide an explanation for this reducing trend of TGNPDCL sales and the deviation from the Resource Plan order.</p> | % Sales/Year | FY18 | FY19 | FY20 | FY21 | FY22 | FY23 | FY24 | FY25 | FY26 | FY27 | FY28 | FY29 | TGNPDCL | 30 | 30 | 32 | 33 | 30 | 28 | 28 | 27 | 26 | 25 | 24 | 23 | TGSPDCL | 70 | 70 | 68 | 67 | 70 | 72 | 72 | 73 | 74 | 75 | 76 | 77 | Total MU | 50,562 | 57,538 | 58,522 | 57,049 | 61,154 | 67,791 | 74,442 | 75,895 | 81,409 | 89,331 | 97,932 | 1,07,291 | <p>commercial consumption, given the expected increase in these activities. Any deviation in actual sales as compared to approved sales, which would result in deviation of Power Purchase cost as well as revenue would be adjusted in True-up filings.</p> <p>Historically LIS sales have been erratic. There has been a reduction in Actual LIS sales for FY 2023-24 as compared to approved sales. The reasons are multifold: Delay in commissioning of projects, Lower than expected Monsoon etc. Hence, the licensee has considered LIS sales projections for FY 2024-25 to be same as FY 2023-24. Any deviation in actual sales as compared to approved sales, which would result in deviation of Power Purchase cost as well as revenue would be adjusted in True-up filings</p> <p>The sales of SPDCL and NPDCL have been determined independently based on their respective historical actual sales and growth rates and hence the sales pattern of both DISCOMs needs to be looked at independently</p> |
|--------------|--|--|--------|--------|--------|--------|--------|--------|--------|--------|--------|----------|------|------|---------|----|----|----|----|----|----|----|----|----|----|----|----|---------|----|----|----|----|----|----|----|----|----|----|----|----|----------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|----------|--|
| % Sales/Year | FY18 | FY19 | FY20 | FY21 | FY22 | FY23 | FY24 | FY25 | FY26 | FY27 | FY28 | FY29 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| TGNPDCL | 30 | 30 | 32 | 33 | 30 | 28 | 28 | 27 | 26 | 25 | 24 | 23 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| TGSPDCL | 70 | 70 | 68 | 67 | 70 | 72 | 72 | 73 | 74 | 75 | 76 | 77 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total MU | 50,562 | 57,538 | 58,522 | 57,049 | 61,154 | 67,791 | 74,442 | 75,895 | 81,409 | 89,331 | 97,932 | 1,07,291 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | <p>As for LT Agriculture, the growth rate considered is lower than what was used in Resource Plan order. But it is reported that consumption in FY24 was very high (30% over FY23 figure for TGSP and 20% for TGNP). Issues about Agriculture estimation have been raised many times, and the Hon'ble TGERC had directed DISCOMs to meter all Agriculture DTs to improve the estimate. DISCOMs have been committing to carry out this, but in the petitions this year, they have clearly indicated that DT metering is not in the agenda. This is clear from the response to TGERC's directive, as shown below.</p> | <p>The discoms proposed to segregate the AGL feeders for better apportioning of AGL consumptions after approval of RDSS scheme of MoP, GoI to reduce the cost of AGL DTR metering.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | <p>New Directive 5:</p> <p><i>"The Commission directs the TGDISCOMs to achieve 100% Agricultural DTR metering within a period of twelve (12) months and to furnish the quarterly progress on the status of implementation in this regard."</i></p> <p>TGSPDCL Response: <i>"Under RDSS, MoP has laid emphasis on Segregation of Agriculture feeders through which all the agriculture loads will be segregated onto separate feeders. All the feeders in TGSPDCL were already equipped with feeder meters (DLMS). Now that under RDSS, all feeder meters are to be metered with communicable & AMI/AMR meters. If we take up segregation of Agriculture feeders under RDSS, we can assess the agriculture consumption with feeder meter data itself without fixing meters to agriculture DTRs" (Report is submitted to Hon'ble TGERC on 19/8/2023)</i></p> <p>It is unfortunate that the DISCOMs are backing up from the relatively easy task of metering DTs. RDSS proposals will need approval from Gol and feeder separation will take many years to be implemented.</p> <p>As has been requested last year too, Hon'ble TGERC could consider setting up a committee to revise the current methods of estimation of agriculture consumption, since this has a significant bearing on subsidy and DISCOM AT&C losses.</p> | |
| | <p>Open access: There is another important related point about open access in TG. From the petitions, we gather that there is low or no growth in OA consumption or revenue. Hon'ble TGERC may wish to review the implementation of its Open Access and Green Open Access Regulations in the state. Tracking and reporting of Open Access consumption in the state is important from a DISCOM planning perspective. Going forward, with the</p> | <p>The data made available as additional information to the Hon'ble Commission. The decrease in revenue from OA consumptions is due to exemption of additional surcharge to GEOA consumers passed by the Hon'ble commission in its order.</p> |

notification of Green Energy Open Access regulations, reporting of RE and non-RE based sales migration will also be integral, across varying ranges of contracted demand. Separate reporting of RE and non-RE OA, along with their tenure, is already a practice that Maharashtra and Rajasthan ERC follow as part of their tariff formats. Bihar ERC also reports the number of applications received and processed, along with the total quantum of power availed by OA in the year (in MUs). Given these good practices being followed in other states, TS DISCOMs are requested to submit data as per the following suggested format given in Annexure 1

Figure 1: Sales trend of TG DISCOMs



To summarise, sales forecast of DISCOMs appear highly optimistic. The CAGR of total sales in TG in the period FY18-23 was 6% and the CAGR for FY25-29 as

As explained earlier, the licensees have almost achieved/exceeded the sales approved in Resource Plan for FY 2024-25 in FY 2023-24 itself. Hence the licensees have not considered sales as per resource plan for projections for 5th Control period. Moreover, the licensees have estimated sales for 5th Control period based on FY 2023-24 actual sales as compared to resource plan projections which are based on FY 2022-23 H1 actuals and H2 projections. Any deviation in actual sales as compared to approved sales, which would result in deviation of Power Purchase cost as well as revenue would be adjusted in True-up filings

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| | <p>per the Resource Plan order (issued as recently as December 2023) was close to it, at 5.7%. DISCOM petitions submitted as part of the Resource plan process also had CAGR for FY25-29 as 5.87%. But as per the DISCOM petitions, CAGR for FY25-29 is 9%. Figure 1 plots the sales trends – actuals for FY18-23, Resource Plan order for FY25-29 and DISCOM petition for the same period. There is a need for DISCOMs to rigorously review the sales forecast. We request the Hon'ble TGERC to direct the DISCOMs to undertake this within a specified time and if needed revise the Resource Plan.</p> | |
| | <p>Tariff proposals</p> <p>Petitions propose upward revision of Fixed Charges (FC) for high domestic (> 300 Units/month), and many other categories. Percentage increase of FC is higher for LT, compared to HT. The basis for such an increase could be provided.</p> | <p>The licensee would bring to the notice of the Hon'ble Commission that projected Average Cost of Supply for FY 2024-25 for the licensee is higher than approved Average Cost of Supply for FY 2023-24. In order to ensure cost recovery, the licensees have proposed to increase in tariff in light of increase of costs.</p> <p>In the current tariff structure only 30% of the fixed cost is being recovered through fixed charges. The fixed charges constitute the fixed revenue of DISCOMs and are not reflective of the fixed costs incurred by them. Hence the DISCOMs request the Hon'ble Commission to approve the proposed tariffs. Full recovery of cost incurred by DISCOMs will enable delivery of quality, reliable and uninterrupted power supply to its consumers</p> |
| | <p>Tariff proposals</p> <p>Time of the Day tariff</p> <p>DISCOMs have proposed to continue the existing ToD framework, which gives 1 Rs energy charge penalty during eight (supposedly peak) hours (0600-1000,</p> | <p>The Discoms will take up the change in the TOD timings in the ensuing filings to balance the demand and supply.</p> |

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| <p>1800-2200) and 1 Rs energy charge rebate during eight (supposedly non-peak) hours (2200-0600). There is a need to revise this approach, based on a study of the daily and seasonal load and supply patterns to expand the scope and base of ToD. We give some suggestions in the following paragraphs.</p> <p>A framework for ToD Tariffs was detailed in the recently notified Electricity (Rights of Consumers) Amendment Rules, 2023. The relevant section of these Rules, under the Electricity Act are quoted below:</p> <p><i>“(8A) Time of Day Tariff</i></p> <p><i>The Time of Day tariff for Commercial and Industrial consumers having maximum demand more than ten Kilowatt shall be made effective from a date not later than 1st April, 2024 and for other consumers except agricultural consumers, the Time of Day tariff shall be made effective not later than 1st April, 2025 and a Time of Day tariff shall be made effective immediately after installation of smart meters, for the consumers with smart meters:</i></p> <p><i>Provided that, the Time of Day Tariff specified by the State Commission for Commercial and Industrial consumers during peak period of the day shall not be less than 1.20 times the normal tariff and for other consumers, it shall not be less than 1.10 times the normal tariff:</i></p> <p><i>Provided further that, tariff for solar hours of the day, specified by the State Commission shall be atleast twenty percentless than the normal tariff for that category of consumers:</i></p> <p><i>Provided also that the Time of Day Tariff shall be applicable on energy charge component of the normal tariff:</i></p> <p><i>Provided also that the duration of peak hours shall not be more than solar</i></p> | |
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hours as notified by the State Commission or State Load Despatch Centre.”
(emphasis added)

This framework is reflective of recent changes in demand and supply profiles in states, where low-cost renewable energy (RE), especially solar is available during day-time.

ToD tariffs reflective of demand-supply profiles also assist with cost reflective pricing for DISCOMs. In the long-run, if tariffs are reflective of costs in peak and off-peak periods, ToD tariffs can also help smoothening demand and reducing the requirement for additional investments and capacity.

However, the national framework should ideally be adapted to suit state context, demand supply profiles and existing metering infrastructure.

In this context, the following framework is suggested for Telangana:

- Applicability: ToD should be applicable on all HT consumers and LT Commercial and Industrial consumers with load > 20 kW. Within 2 years, ToD tariffs should be levied on all consumers with MD > say 2 kW using smart meters and consumers with RTPV especially net metering.
- Framework: Based on trends in Telangana’s demand, net demand (demand minus solar and wind generation), the following slots and rates (expressed as a % of energy charges) are proposed, as shown in Table 5:

| Time-Slot | 05:00-10:00 | 10:00-15:00 | 15:00- 20:00 | 20:00 -05:00 |
|------------------|-------------|-------------|--------------|--------------|
| Rebate | | 20% | | |
| Surcharge | 20% | | 20% | |

In the proposed structure, there is no penalty between 20:00 to 05:00 which

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| | <p>might also change with increase in demand and increased open access, captive, RTPV and banking requirements over time. Further seasonal variations in tariff are also likely. A seasonal increase in base tariff or a ToD slot-based mark-up based on a detailed study could also be considered.</p> <p>We request Hon'ble TGERC to consider taking up an exercise to revise the current ToD design to suit the interests of the DISCOMs and the consumers.</p> | |
| | <p><u>Grid support and standby charges</u></p> <p>DISCOMs have proposed introduction of Grid Support Charges (GSC) or Parallel Operation Charge (POC) for all captives – renewable or otherwise, co-located or otherwise. The proposal to calculate based on apportionment of R&M of network is reasonable, with the charge of Rs.19.37/kW/Month amounting to less than 5% of the FC for HT consumers and 15% for LT. Many states have been implementing a similar charge for captive.</p> <p>DISCOMs should indicate the revenue expected from GSC, which we estimate to be quite low as of now. We request Hon'ble TGERC to consider a lower GSC for RE captive plants.</p> <p>DISCOMs have proposed Standby charges for GEOA consumers, as temporary tariff or market price, whichever is higher. While this is reasonable, Hon'ble TGERC may wish to explore other more cost-reflective methods of implementing Standby charge, followed by states like Punjab and Maharashtra. In these states, GEOA consumers pay a commitment charge if they plan to depend on DISCOM, in addition to a high energy charge for use.</p> <p><i>Punjab: Punjab ERC has introduced a commitment charge framework, where OA consumers are required to pay monthly commitment charges (ranging from Rs. 35 to Rs. 60 per kVA, depending on the number of days for which standby</i></p> | <p>Based on the directions of Hon'ble commission on its order on grid support charges the discoms have proposed GSC in accordance with the methodology specified by the Hon'ble Commission in the order</p> |

| | <p>power is availed) regardless of whether standby power is used. For unplanned, standby power, the charge is 1.25 times of the tariff. With day ahead notice, the charge is the same as the tariff.</p> <p>Maharashtra: Maharashtra ERC employs a four-tier differential standby charge system for captive consumers: i) 25% of the monthly demand charges when standby is not used, ii) 100% of the demand charges when standby is requested but not utilised, iii) 150% of the demand charges if recorded demand exceeds the contracted demand, and iv) 200% of the demand charges if standby is not opted for, but service is still provided.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--------|--|---|---|----------------|--|---|-------------|---|---------|-----|------|------|---|---------|-----|------|------|---|---------|-----|-----|------|---|---------|-----|-----|------|---|---------------------|-----|-----|-----|-------|--|------|------|------|
| | <p><u>Quality of supply & service</u></p> <p>Performance reports in the DISCOM petition provide some details about quality of supply and service indicators. While these are good, providing spreadsheets for these Tables will ease study and analysis. As we have repeatedly pointed out, 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.</p> <p>Accident information is given by both DISCOMs, and as mentioned before, TGSP gives consolidated data for 2 years. We request the DISCOMs to provide data for past 3 years to check if the trend in accidents. Since there have been many directives and efforts by the DISCOMs, there should be gradual reduction of accidents.</p> <p>TGNPDCL has given cause wise list of human and animal accidents in FY24 (pp 97 of TGNP petition). From a cursory analysis, of the 338 fatal human accidents, it appears that TGNPDCL is responsible for nearly 30%. This needs detailed explanation. Hon'ble TGERC had directed DISCOMs to conduct Root</p> | <p>The data has been provided based on the formats approved by the hon'ble commission.</p> <p>The abstract of fatal electrical accidents occurred to humans and an animal, during past 4 Financial Years in TGNPDCL is as follows:</p> <table><tr><th>Sl. No</th><th>Financial Year</th><th>No of Human Fatal electrical accidents</th><th>No of Animal Fatal electrical accidents</th><th>Total(Nos.)</th></tr><tr><td>1</td><td>2020-21</td><td>567</td><td>1001</td><td>1568</td></tr><tr><td>2</td><td>2021-22</td><td>539</td><td>1116</td><td>1655</td></tr><tr><td>3</td><td>2022-23</td><td>521</td><td>856</td><td>1377</td></tr><tr><td>4</td><td>2023-24</td><td>465</td><td>791</td><td>1256</td></tr><tr><td>5</td><td>2024-25 Upto Sep-24</td><td>225</td><td>516</td><td>741</td></tr><tr><td colspan="2">Total</td><td>2317</td><td>4280</td><td>6591</td></tr></table> <p>From the above table, It may be inferred that number of fatal electrical accidents has come down over a period of past 4</p> | Sl. No | Financial Year | No of Human Fatal electrical accidents | No of Animal Fatal electrical accidents | Total(Nos.) | 1 | 2020-21 | 567 | 1001 | 1568 | 2 | 2021-22 | 539 | 1116 | 1655 | 3 | 2022-23 | 521 | 856 | 1377 | 4 | 2023-24 | 465 | 791 | 1256 | 5 | 2024-25 Upto Sep-24 | 225 | 516 | 741 | Total | | 2317 | 4280 | 6591 |
| Sl. No | Financial Year | No of Human Fatal electrical accidents | No of Animal Fatal electrical accidents | Total(Nos.) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | 2020-21 | 567 | 1001 | 1568 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | 2021-22 | 539 | 1116 | 1655 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | 2022-23 | 521 | 856 | 1377 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | 2023-24 | 465 | 791 | 1256 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 5 | 2024-25 Upto Sep-24 | 225 | 516 | 741 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | | 2317 | 4280 | 6591 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| <p>cause analysis of accidents, as per Earlier Directive 8. In their reply, TGSP has stated that: <i>"The report on the root cause analysis of electrical accidents during the second half H2 (i.e.Oct'2023 to Mar'24) of FY-2023-24 and the preventive measures adopted has been submitted to the Hon'ble Commission vide Lr.No.CGM (RAC)/SE (RAC)/ DE (RAC)/ F.C31/ D.No.191/24, Dated: 22.06.2024."</i></p> <p>We request the Hon'ble TGERC to make such reports of TGSP and TGNP available to the public by publication on website. This would help to get professional and local organisations involved in the efforts of DISCOMs to reduce accidents.</p> <p>From FY21, REC has been publishing Annual Consumer Service Rating (CSR) reports of DISCOMs, with the latest report available for FY23. These reports cover feeder outages, DT failures, Metering, Billing & Collection (MBC) complaints, Fuse out complaints etc. CSR reports are based on detailed inputs provided by the respective DISCOMs. Some DISCOMs have been uploading these detailed inputs on their websites. For example, APCPDCL website has spreadsheet versions of these inputs circle-wise & month-wise, such as Fuse out call details with summary, urban, industrial & rural feeder outage with hours of supply/interruptions/ SAIFI/SAIDI calculation, MBC complaint data etc. We request Hon'ble TGERC to direct the TG DISCOMs to provide similar information on their websites. Tracking such granular data over the years is important to ensure that there is ensure improvement of consumer quality of supply & service.</p> <p>Since there are many complaints regarding quality of supply and service, Hon'ble TGERC could consider revising the SoP Regulations of 2016. Considering the advances in metering and information technology, it is now possible to monitor violations of standards in a more granular fashion. There</p> | <p>years. This is achieved by taking up following measures by TGNPDCL.</p> <ul style="list-style-type: none"> (i) TGNPDCL has appointed Divisional Engineer/Technical of circles as Divisional Engineer/ Technical and Nodal safety officer to educate the employees to reduce the possibility departmental fatal/non-fatal accidents to our staff, unmanned workers and unauthorized personnel during execution of works in the field and directed to implement safety measures strictly to avoid electrical accidents and make zero accident in our TGNPDCL (ii) Conducting meeting with agricultural consumers in their fields in 'Polambata' by field Engineers and creating awareness among them to follow safety rules while operating with switch boards, starters of motors (iii) Conducting safety awareness programs with consumers in villages, raising height of distribution transformers where and explaining about causes of electrical accidents like substandard electrical house wiring, low quality domestic appliances, not providing earthing at houses and switch boards, (iv) Distribution of pamphlets to consumers at more accidents prone areas. (v) Conducting awareness programs in schools and Colleges in Mahabubabad Circle with PPTs. Similar action is being carried out in other circles also. (vi) Conducting PEP talk with O&M staff by Officers, AE/OP, ADE/OP, DE/OP and DE/Technical's. (vii) All the O&M staff are provided appropriate "PPE" (Personnel Protective Equipment) i.e., Hard Hat, Gloves, Portable earthing short circuiting kits, safety shoes, insulated tools, Voltage detector, etc.. |
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| | <p>should be efforts to tighten the performance benchmarks, based on analysis of SoP reports submitted by DISCOMs, especially since a portion of RoE is now linked to performance.</p> | <p>As per the directions of the Hon'ble Commission, the DISCOMs are paying the ex-gratia to the victims, however the Commission has disallowed such expenses in the DISCOM filings.</p> <p>TG Discoms have been communicating the SOP reports to the Hon'ble Commission as per the schedules and the same are made available in the Hon'ble Commission's website.</p> <p>The information has been provided to the Hon'ble Commission as per the formats prescribed by the Hon'ble Commission</p> |
| 3 | <p>MYT Petitions on Discom Network Business</p> <p>DISCOM has proposed uniform wheeling charge of Rs 440/kVA/month for 33 kV, 11 kV and LT. This is as opposed to voltage based wheeling charge and loss in the previous MYT order. In Section 5 of the petition on Rationale of Wheeling charges, DISCOM has argued that Distributed RE (DRE), storage and wind-solar hybrid would increase network losses, due to reverse power flow. From the Additional information (Replies to TGERC queries), DISCOMs have not given any computation on the extent of reverse power flow and resultant increase in network losses. Conventional wisdom on DRE is that they help to reduce network losses, since they are located closer to consumption points. Are the DISCOMs expecting significant DRE installations, with capacity exceeding contracted load? Are distributed storage facilities being planned, which may increase reverse power flow? As per Net metering regulations, RTS is permitted only to some extent of loading of the DTR (50% to maximum 100%). Therefore, it is not clear how the duration and current would increase normal flows to increase losses. We request the DISCOMs to provide detailed calculations on this. Transmission is an interconnected grid and there is some logic in having similar wheeling charges for all voltages. It is not clear how the</p> | <p>Government of India has a vision of increasing the share of RE to 50% of its total power capacity by 2030. As a result of which there is going to be increase in RE uptake from technologies such as solar and Wind. Further, this is also likely to improve the share of distributed RE generation where consumers would become prosumers. Distributed RE projects that are going to be grid connected would be injecting power into the grid. It is to noted that as more and more households would be turning into prosumers, power flow would take place from LT side to higher voltage side during times of lower demand. As losses on the LT side are higher as compared to losses on the HT side, therefore it will lead higher losses for the Discoms as more generation start taking place on the LT side of the network. Further, ISTS network, STU network and the discom network are connected to each other hence the same logic that applies to Transmission network may also be extended to distribution network as India's grid is unified.</p> <p>The distribution licensee will take the steps to measure the</p> |

| | same logic is being applied for distribution network. | actual quantum of reverse power and will be made available in the next filings depending on where the distributed generations are getting added on/ point of injection. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|---|--------------|-----------|------------|-----------|--|-------|-----------|-------|----|--|-------|----------|----|-----|--|-------|--------|----|---|--|--------|--------|----|-----|---|--------|-----|---|-----|---|--------|--------|----|-----|-------|--|-----------|-------|--|--|
| | <p>Capex plans in the petitions of TGSP and TGNP mention the proposed plan to install smart meters for all non-agriculture consumers in the next five years. 42% of the total 28,402 Cr total capex of TGSP from FY25-29 and 30% of the Rs 11,816 Cr total capex of TGNP are earmarked for smart meters. Additional information provided by TGNP gives some details of the smart meter roll out plan, as indicated in Table 6.</p> <table><tr><th>Type of Meter</th><th>Unit Rate Rs</th><th>Qty Nos</th><th>Cost Rs Cr</th><th>% of cost</th></tr><tr><td>Sph whole current Smart Meter - Consumer Meter</td><td>6,000</td><td>55,50,500</td><td>3,330</td><td>94</td></tr><tr><td>3ph whole current smart Meter - Consumer Meter</td><td>6,000</td><td>1,27,496</td><td>76</td><td>2.1</td></tr><tr><td>3Ph LT -CT operated Smart Meter - Consumer Meter</td><td>6,000</td><td>19,917</td><td>12</td><td>0</td></tr><tr><td>3Ph LT -CT operated Smart Meter - DT Meter</td><td>23,000</td><td>39,366</td><td>91</td><td>2.5</td></tr><tr><td>3Ph CT/PT operated Smart Meter - Boundary Meter</td><td>42,000</td><td>152</td><td>1</td><td>0.0</td></tr><tr><td>3Ph CT/PT operated Smart Meter feeder Meter</td><td>42,000</td><td>11,926</td><td>50</td><td>1.4</td></tr><tr><td>Total</td><td></td><td>57,49,357</td><td>3,560</td><td></td></tr></table> <p>It is clear that the investment is significant and the Gol financial support for smart meter is low. From Table 5, it is also clear that 94% of the cost is for single phase consumer meter. The petition does not provide any cost benefit analysis of this investment, which would have to be made by the DISCOMs, hence borne by the State or consumers. The cost for DT metering is quite low, and it is surprising why the DISCOM is not ready to take it up, without waiting for RDSS project approval. We request response to the following questions:</p> | Type of Meter | Unit Rate Rs | Qty Nos | Cost Rs Cr | % of cost | Sph whole current Smart Meter - Consumer Meter | 6,000 | 55,50,500 | 3,330 | 94 | 3ph whole current smart Meter - Consumer Meter | 6,000 | 1,27,496 | 76 | 2.1 | 3Ph LT -CT operated Smart Meter - Consumer Meter | 6,000 | 19,917 | 12 | 0 | 3Ph LT -CT operated Smart Meter - DT Meter | 23,000 | 39,366 | 91 | 2.5 | 3Ph CT/PT operated Smart Meter - Boundary Meter | 42,000 | 152 | 1 | 0.0 | 3Ph CT/PT operated Smart Meter feeder Meter | 42,000 | 11,926 | 50 | 1.4 | Total | | 57,49,357 | 3,560 | | <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. As smart meters installation is a country wide exercise being done basis guidelines / policy measures by Ministry of Power, Government of India, it is apt that TGDIs budget the capital expenditure that would be incurred for smart meters installation for its consumers.</p> |
| Type of Meter | Unit Rate Rs | Qty Nos | Cost Rs Cr | % of cost | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Sph whole current Smart Meter - Consumer Meter | 6,000 | 55,50,500 | 3,330 | 94 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3ph whole current smart Meter - Consumer Meter | 6,000 | 1,27,496 | 76 | 2.1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3Ph LT -CT operated Smart Meter - Consumer Meter | 6,000 | 19,917 | 12 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3Ph LT -CT operated Smart Meter - DT Meter | 23,000 | 39,366 | 91 | 2.5 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3Ph CT/PT operated Smart Meter - Boundary Meter | 42,000 | 152 | 1 | 0.0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3Ph CT/PT operated Smart Meter feeder Meter | 42,000 | 11,926 | 50 | 1.4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total | | 57,49,357 | 3,560 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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| | <p>a) Is the proposal for Smart metering approved by the Hon'ble TGERC? If so, what is the roll-out plan?</p> <p>b) Is the costing under Capex/ Totex? If Totex, what is the framework for cost-passthrough, prudence check and performance evaluation?</p> <p>c) Have the DISCOMs provided a cost benefit analysis of the Smart metering proposal? If so, request to share the studies.</p> <p>d) Has an Advanced Metering Infrastructure Service Provider (AMISP) been appointed? If so, can the contract along with the Service Level Agreement (SLAs) be shared?</p> | |
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5వ నియంత్రణ కాలము యొక్క అధిక సంవత్సరాలకు (2024-25 నుండి 2028-29వరకు) రిటైల్ సప్లయ వ్యాపారము కోసము సమగ్ర ఆదాయ ఆవశ్యకత మరియు 2024-25 అధిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి, ధరల ప్రతిపాదనలు & క్రాస్ సబ్సిడీ సర్పార్టీ ప్రతిపాదనలపై ఎం. శ్రీధర్ రెడ్డి, ఇప్ప రాజేందర్, డబ్బా రవి, విట్టల్ రెడ్డి, బండి కృష్ణ రెడ్డి, దేవిరెడ్డి విట్టల్ రెడ్డి, పైడి ఎల్లా రెడ్డి, కె.అంజనా, కొమిరెడ్డి చిన్నా అంజనా, లంక వెంకట్ రెడ్డి, కొమిరెడ్డి అంజనా పెద్ద, ఎం.రాజిరెడ్డి, జి. వినోద్ కుమార్, డా. ఎ. వి రావు, శ్రీ రంగ రావు, డి.రాము, అంబిరా ఆనంద రావు, సి.వి.భాస్కర్ రావు, కొండేల సారా రెడ్డి

గారి సూచనలు/సలహాలకు సమాధానాలు

| క్రమసంఖ్య | అభ్యంతరాలు /సూచనలు | TGNPDCL – సమాధానాలు |
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| 1. | తెలంగాణ రాష్ట్ర విద్యుత్ నియంత్రణ మండలి భవనాన్ని నిర్మించి మీ సేవలు విస్తృతం చేయడానికి మీరుస్వంత భవనం లో స్థిరమైనందుకు మిమ్మల్ని అభినందిస్తున్నాము. | — |
| 2. | ఈ భవనము కోసం స్థలం ఇచ్చిన జెన్నోను, సహకరించిన GHMC, బలంగా సుందరంగా నిర్మించిన కాంట్రాక్టర్లు కు కృతజ్ఞతలు. | — |
| 3. | ERC లో నూతనం గా నియమించబడ్డ సిబ్బందికి శుభాభినందనలు తెలుపుతూ సత్వరమే సేవలు అందించుటకు ప్రక్షేతులుగా కావాలని కోరుతున్నాము. | — |
| 4. | ఆర్టిజన్ ఉద్యోగుల జీతభత్యాలను పెంచాలి. సీనియర్ ఉద్యోగస్తులకు ఉన్న జీతభత్యాలపై చరమ (సీలింగ్) అవధి ఉండాలి. | వేతన సవరణ చర్చల కమిటీ'2022 నివేదిక ప్రకారం మరియు తెలంగాణ పవర్ యుటిలిటీల యాజమాన్యాలు, తెలంగాణ పవర్ యుటిలిటీలలో ప్రాతినిధ్యం వహిస్తున్న యూనియన్ల మధ్య కుదిరిన సెటిల్మెంట్ మెమోరాండం ప్రకారం |

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| | | 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 |
| 5. | రైతులు నూతన (ట్రాన్స్ఫార్మర్లు) కనెక్షన్ కోసం డిడిలు తీసినప్పుడు రూపంలో వేలు లక్షలు కట్టవలసిందిగా నోటీసులు పంపుతున్నారు. దానివల్ల రైతులకు వ్యవసాయ రంగంలో తొలి అప్పు విద్యుత్ కోసమే అవుతుంది. సామాగ్రి కూలీల వ్యయం పెరిగినందువల్ల రైతులు చెల్లించే డిడి కి రెట్టింపు చేసినకనీసము మూడు LT పోల్ల దూరానికి అదనపు ఛార్జీలు లేకుండా కనెక్షన్ ఇవ్వాలి. | డిపార్ట్మెంట్ నిబంధనల ప్రకారం ఈ క్రింది విధంగా అంచనా వ్యయం మించి ఉంటే వినియోగదారుడు ORC రూపంలో ఛార్జీలను చెల్లించాలి: i) అంచనా లో HT లైన్, LT లైన్ & DTR ఉంటే, వ్యయం ప్రతి సర్వీస్ కు రూ.70,000/- TGNPDCL భరిస్తుంది. ii) అంచనా లో LT లైన్ మాత్రమే ఉంటే, వ్యయం ప్రతి సర్వీస్ కు రూ.45,000/- TGNPDCL భరిస్తుంది. |
| 6. | DTR దిమ్మెలు రైతులే నిర్మించుకుంటున్నారు దానిని ఎస్టిమేషన్ లో నుండి తీసివేయాలి. దిమ్మె కోసం కేటాయించిన డబ్బులు అవసరమైనచో ఇతర సామగ్రి కోసం ఉపయోగించాలి. | DTR దిమ్మెలు డిపార్ట్మెంటు ద్వారా నిర్మించడం జరుగుచున్నది. |
| 7. | ట్రాన్స్ఫార్మర్ నుండి రైతు కనెక్షన్ వరకు గల ప్రక్రియలో మేము ఏమి చేయాలి? డిస్కం ఏం చేస్తుంది?. | వ్యవసాయ సర్వీస్ లను విడుదల చేసే విధానం: i. వినియోగదారుడు మీ-సేవ/NPDCL పోర్టల్లో వారికి అవసరమైన లోడ్కు అవసరమైన ఛార్జీలను చెల్లించి దరఖాస్తులను నమోదు |

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| | | <p>చేసుకోవాలి.</p> <p>ii. మీ-సేవ/NPDCL పోర్టల్లో దరఖాస్తును నమోదు చేసిన తర్వాత, దరఖాస్తుతోపాటు పత్రాలు సంబంధిత అసిస్టెంట్ డివిజనల్ ఇంజనీర్ లాగిన్ కి పరిశీలన మరియు సర్వీస్ కనెక్షన్ కోసం పంపబడతాయి.</p> <p>iii. అసిస్టెంట్ డివిజనల్ ఇంజనీర్/ఆపరేషన్ అదే దరఖాస్తు ను సంబంధిత సెక్షన్ ఆఫీస్ లాగిన్లకు పత్రాలతో పాటు పంపిస్తారు.</p> <p>iv. సెక్షన్ ఆఫీసర్ సైట్ లొకేషన్తో పాటు ఆధార్ కార్డ్, పట్టా పాస్ బుక్, సి-ఫారమ్ మొదలైన అన్ని పత్రాలను ధృవీకరిస్తారు.</p> <p>v. వినియోగదారుకు ఎటువంటి మౌలిక సదుపాయాలు అవసరం లేకుంటే, సక్రమంగా సర్వీస్ నంబర్ను కేటాయించి కనెక్షన్ ఇవ్వబడుతుంది మరియు EBSలో అప్లోడ్ చేయడానికి నెలవారీ సర్వీస్ కనెక్షన్ రిలీజ్ రిటర్న్ లో EROకి పంపబడుతుంది.</p> <p>vi. వినియోగదారునికి మౌలిక సదుపాయాలు (LT లైన్, 11KV లైన్ & DTR మొదలైనవి) అవసరమైతే, ఈ అప్లికేషన్ ఫస్ట్ ఇన్ ఫస్ట్ అవుట్లో అంచనాను రూపొందించడానికి SAPకి పోస్ట్ చేయబడుతుంది (అంటే, సెక్షన్ స్థాయిలో సీనియారిటీ జాబితాలో జోడించబడుతుంది).</p> <p>vii. సీనియారిటీ జాబితా ప్రకారం అంచనా డబ్ల్యుబిఎస్ నంబర్</p> |
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| | | <p>స్పష్టించబడుతుంది మరియు కాంపిటెంట్ అథారిటీల ద్వారా మంజూరు కోసం పంపబడుతుంది.</p> <p>viii. అధికార ప్రతినిధి బృందం ప్రకారం అంచనా మంజూరు చేయబడుతుంది మరియు అంచనా వ్యయం మించి ఉంటే ORC చెల్లింపు కోసం డిమాండ్ నోటీసు వినియోగదారునికి జారీ చేయబడుతుంది.</p> <ul style="list-style-type: none"> ➤ అంచనా లో HT లైన్, LT లైన్ & DTR ఉంటే, వ్యయం ప్రతి సర్వీస్ కు రూ.70,000/- TGNPDCL భరిస్తుంది. ➤ అంచనా లో LT లైన్ మాత్రమే ఉంటే, వ్యయం ప్రతి సర్వీస్ కు రూ.45,000/- TGNPDCL భరిస్తుంది. <p>ix. అంచనాను మంజూరు చేసిన తర్వాత, పద్ధతి ప్రకారం కాంట్రాక్టర్ ఒప్పందాన్ని తీసుకోవటం జరుగుతుంది.</p> <p>x. డివిజన్ కార్యాలయం నుండి ఒప్పందాన్ని అందించిన తర్వాత AE/ఆపరేషన్ ద్వారా వర్క్ ఆర్డర్ తీసుకోబడుతుంది.</p> <p>xi. వర్క్ ఆర్డర్ను విడుదల చేసిన తర్వాత, స్టోర్ల నుండి మెటీరియల్ డ్రా చేయబడుతుంది మరియు పని అమలు చేయబడుతుంది.</p> <p>xii. వినియోగదారుడు వ్యవసాయ మోటార్ సామర్థ్యానికి సరిపడు కెపాసిటర్ ను అమర్చుకోవాలి.</p> <p>xiii. తర్వాత సర్వీస్ కనెక్షన్కు నంబర్ను కేటాయించి, EBSలో అప్లోడ్</p> |
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| | | చేయడానికి నెలవారీ సర్వీస్ కనెక్షన్ రిలీజ్ రిటర్న్ లో EROకి పంపబడుతుంది. |
| 8. | Toll Free నెంబర్లు 1800 425 3600, 1800 425 0028 లను పునరుద్ధరించాలి. Toll Free నెంబర్లు క్రియాత్మకం (active) చేస్తూ ప్రచారం చేయాలి. ప్రతి ట్రాన్స్ఫర్మర్ గద్దె పై ప్రధాన కూడల్లో ప్రజలు రద్దీగా ఉండే చోట్లలో టోల్ ఫ్రీ నెంబర్లు రాయాలి. టోల్ ఫ్రీ నెంబర్ కు ఫోన్ చేస్తే మీ AE గారికి చెప్పారా అని అడుగుతున్నారు.కాబట్టి ఇలా ఆడగకుండా బాధ్యతను వారికి అర్థం చేయించండి. విద్యుత్తుకు సంబంధించిన ప్రతి కంప్లైంట్ టోల్ ఫ్రీ ద్వారానే జరిగే విధంగా చర్యలు చేపట్టి పని పూర్తి అయ్యేవరకు పర్యవేక్షణ చేస్తూ సంబంధిత అధికారులను సమాయత్తం చేయాలి. | <p>1. టోల్ ఫ్రీ నంబర్స్ 1800 425 0028 & 1912 వాడకంలో ఉన్నాయి.</p> <p>2. అన్ని విద్యుత్ కార్యాలయాల్లో , సబ్ స్టేషన్ లలో , గ్రామ పంచాయతీ కార్యాలయాల వద్ద మరియు ట్రాన్స్ఫార్మర్ల గద్దెలపై టోల్ ఫ్రీ నంబర్లు వ్రాయబడ్డాయి.</p> <p>3. వినియోగదారుడు టోల్ ఫ్రీ నెంబర్ కు ఫోన్ చేస్తే కాల్ సెంటర్ ఏజెంట్స్ తన ఫిర్యాదు నమోదు చేసుకొని ఆ సమాచారాన్ని సంబంధిత అధికారికి తెలియజేస్తారు.</p> <p>4. విద్యుత్తుకు సంబంధించిన ప్రతి ఫిర్యాదు టోల్ ఫ్రీ నెంబర్ ద్వారా నమోదు చేసుకొని అది పూర్తి అయ్యే వరకు సంబంధిత అధికారులతో విచారణ చేయడం జరుగుతుంది.</p> <p>5. వినియోగదారుల ఫిర్యాదులను ఇబ్బంది లేకుండా పరిష్కరించేందుకు, TGNPDCL అదనంగా 15 మంది సిబ్బందిని CCC సెంటర్లో పని చేయడానికి కేటాయించింది.</p> <p>6. CCC సిబ్బంది, క్షేత్రస్థాయి సిబ్బంది సమన్వయంతో వినియోగదారుల ఫిర్యాదులను సమర్థవంతంగా పరిష్కరించటం జరుగుతుంది.</p> |
| 9. | మొబైల్ అప్లికేషన్ App ద్వారా ఏ విధంగా సమస్యలను పరిష్కరించుకోవచ్చో విరివిగా ప్రచారం చేయాలి.TGSPDCL లో కూడా Mobile App ను ప్రవేశపెట్టాలి. | వినియోగదారుల ఫిర్యాదులను నమోదు చేయడానికి TGNPDCL మొబైల్ యాప్ను అభివృద్ధి చేసింది. ఈ యాప్ను గూగుల్ ప్లే స్టోర్ నుండి డౌన్లోడ్ చేసుకోవచ్చు. |

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| 10. | <p>ట్రాన్స్ఫార్మర్లు, స్తంభాలు మరియు ఇతర సామగ్రి రైతుల ద్వారా ట్రాక్టర్లలో తరలింప చేస్తున్నారు. ఈ పని చేస్తూ ఎందరో ప్రాణాలు పోగొట్టుకుంటున్నారు. కాంట్రాక్టర్ల ద్వారా విద్యుత్ సిబ్బంది ద్వారా జరగవలసిన పనులను రైతులతో చేయించి, రైతుల మరణానికి కారకులైన వారు హంతకులే రైతుల యొక్క అవసరాలు, అమాయకత్వాన్ని వాడుకొని ప్రమాదాలకు గురిచేసి హత్య చేస్తున్నారు. ఫీజులు పోయినప్పుడు సకాలంలో సిబ్బంది స్పందించ నందువల్లపంట నష్టం జరుగుతుందనే ఆవేదనతో ఫీజుల మరమ్మత్తు చేస్తూ ప్రాణాలు పోగొట్టుకుంటున్న వారివి కూడా హత్యలే. వీటిని రైతుల యొక్క తొందరపాటు మరణాలుగా భావించటం కడు సోచనీయం. దానిని నివారించాలి పోల్ల రవాణా చేయించే అధికారులపై కాంట్రాక్టర్ల పై క్రిమినల్ కేసులు పెట్టాలి. ఆపరేషన్ సిబ్బందికి బిల్ కలెక్షన్ బాధ్యతలు అప్పగించి పని భారం పెంచరాదు.</p> | <p>TGNPDCL సిబ్బంది మాత్రమే లైన్లు మరియు డిటీఆర్ల మరమ్మత్తుల కోసం పనిని చేపడతారు కాని రైతులు చేయకూడదు అనే ఈ సందేశం అన్ని రకాల సమాచార మాధ్యమాల ద్వారా విస్తృతంగా ప్రచారం చేయబడుచున్నది.</p> <p>పోల్స్, డిటీఆర్లను డిపార్ట్మెంట్ మాత్రమే రవాణా చేస్తోంది.</p> <p>ఓ&ఎం సిబ్బందికి నిర్దేశిత నిబంధనల ప్రకారం మాత్రమే పనులు అప్పగిస్తున్నారు.</p> |
| 11. | <p>రైతుల ట్రాన్స్ఫార్మర్లు కాలిపోయినప్పుడు విద్యుత్ శాఖ వారే తమ వాహనాలలో తెచ్చి బిగించాలి. ఎట్టి పరిస్థితులలో కూడా రైతులను ముట్టుకోనియ్య రాదు. 60 శాతం DTRలు రవాణా చేసామని ARR(NPDCL ARR Page No 93) లో తెలిపారు. ఇవి అన్నీ పట్టణ - నగర ప్రాంతాలవే, గ్రామీణ DTRలు రవాణా చేయటం లేదు.</p> | <p>చిన్న సామర్థ్యం గల 10/15KVA, 16KVA మరియు 25KVA DTR ల రవాణా కొరకు 2 MT పిక్ప్ వ్యాన్లు ఉపయోగించబడుతున్నాయి మరియు అధిక సామర్థ్యం గల DTRలు అంటే 63KVA మరియు 100 KVA DTRలు రవాణా కొరకు 3 MT పిక్ప్ వ్యాన్లు ఉపయోగించబడుతున్నాయి.</p> |
| 12. | <p>లూజు లైన్లను సరి చేస్తూ కాలం చెల్లిన పాత సామగ్రిని తొలగించి కొత్తవి బిగించాలి.</p> | <p>ఇది నిరంతర ప్రక్రియ మరియు డిపార్ట్మెంట్ ఈ పనిని క్రమం తప్పకుండా నిర్వహిస్తుంది. ఇటీవల 35641 లొకేషన్లలో లూజ్ లైన్లు సరిచేయబడినవి</p> |

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| | | మరియు గుర్తించబడిన ప్రమదాహిత పరికరాలు రిఫ్లేస్మెంట్ చేయబడ్డాయి. |
| 13. | <p>వినియోగదారునికి కేటగిరి ల విషయంలో అవగాహన కల్పించాలి. అవగాహన కలిపించకుండానే కేసులు పెడుతున్నారు. ఉదా: CHAP CUTTAR లు, గో సంపదకు నీరు తాగించటము.</p> | <p>గౌరవనీయులైన TGERC ఆదేశాల మేరకు మాత్రమే టారిఫ్ వర్గీకరణ జరుగుతోంది. పక్కాగా అమలు చేయాలని క్షేత్రస్థాయి సిబ్బందికి ఆదేశాలు జారీ చేయటం జరిగినది.</p> <p>DPE సిబ్బంది తనిఖీ సమయంలో, సరఫరా యొక్క అనధికారిక వినియోగం గుర్తించబడితే, సర్వీస్ యొక్క వాస్తవ కేటగిరి కి సంబంధించి వినియోగదారులకు సరైన అవగాహన కలిపించటం జరుగుచున్నది. ఇంకా, గృహ జ్యోతి స్కీమ్లో ప్రయోజనాలను పొందడం కోసం, కొత్త మీటర్ సర్వీస్ కనెక్షన్లను తీసుకోవడం కోసం, వినియోగదారులకు అవగాహన కల్పించడం కోసం DPE వింగ్ ద్వారా అవగాహన కార్యక్రమాలు నిర్వహించబడుచున్నవి.</p> |
| 14. | <p>అత్యంత ఎక్కువ ఉన్న టారిఫ్ అడ్వర్టైజ్మెంట్ హోర్డింగ్స్ (Shops) వ్యాపార స్థలాలు దుకాణాల టారిఫ్ లు వేరు. వినియోగదారుల నుంచి అత్యధిక ధరలు వసూలు చేసే విమానాశ్రయాలు వారికి అత్యధిక టారిఫ్ గల హోల్డింగు లుప్రదర్శించే వారు అనుమతి లేకుండా ఇతర కేటగిరీలలో వాడుకుంటున్నారు ఇలాంటి వారిని విడిచిపెట్టి చాప్ కట్టర్ (గడ్డిని ముక్కలు చేసే యంత్రం) ఉపయోగించే రైతులపై కేసులు బుక్ చేయడం విచారకరం. Airport కేటగిరీని వేరు చేయాలి. Airport లోని హోటల్స్ పాప్స్ హోల్డింగ్స్ కేటగిరీని వేరు చేయాలి. బస్టాండ్ రైల్వే స్టేషన్ల సేవలు వేరు చేయాలి. Airport సేవలు వేరు</p> | <p>DPE సిబ్బంది తనిఖీ సమయంలో, సరఫరా యొక్క అనధికారిక వినియోగం గుర్తించబడితే, సర్వీస్ యొక్క వాస్తవ కేటగిరి కి సంబంధించి వినియోగదారులకు సరైన అవగాహన కలిపించటం జరుగుచున్నది మరియు అనుమతులు లేకుండా ఇతర కేటగిరీలలో వాడే వినియోగదారులు ఎవరైనా వారి పై కేసులు (Malpractice) బుక్ చేయడం జరుగుచున్నది.</p> <p>ఆర్థిక సంవత్సరం 2024 - 25 సమగ్ర ఆదాయ ఆవశ్యకత మరియు ధరల ప్రతిపాదన లో HT-III కేటగిరి ధరలను , HT-II కేటగిరి ధరలతో సమానంగా</p> |

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| | చేయాలి. | ప్రతిపాదించడం జరిగినది. |
| 15. | టారిఫ్ లవారీగా కేటగిరీలు అన్ని డిస్కం ఆఫీసులలో ప్రదర్శన చేయాలి. ప్రచారం కూడా చేయాలి. | టారిఫ్ ఆర్డర్లు TGNPDCL వెబ్‌సైట్‌లో ఉంచబడినవి మరియు విద్యుత్ బిల్లు వెనుక భాగంలో టారిఫ్ ల వారిగా కేటగిరీలు తెలియచేయటం జరుగుచున్నది. |
| 16. | కనెక్షన్ రిలీజ్ చేసిన తరువాత లిఖితపూర్వకంగా లేఖ ఇవ్వాలి. అంచనా (ఎస్టిమేట్) కాపీలో ఉన్న సామగ్రి, మరియు డ్రా చేసిన సామగ్రి, వాడిన సామగ్రి వేరువేరు గా ఉంటున్నాయి. వినియోగదారుడికి వాడిన సామగ్రి యొక్క వివరాలతో పాటు release లెటర్ ఇవ్వాలి. | <p>అంచనా వ్యయం మంజూరు అయిన తరువాత అందులో పొందు పరచిన సామగ్రి అనగా అవసరమైన స్తంభాలు, DTR వివరాలు వినియోగదారులకి SMS రూపం లో వస్తుంది.</p> <p>స్టోర్ నుండి సామగ్రి తీసుకున్నాక వాటికి సంబంధించిన వివరాలు SMS ద్వారా తెలియ చేయటం జరుగుచున్నది.</p> <p>TG-IPASS & Non TG-IPASS ధరఖాస్తుల రిలీజ్ సర్టిఫికేట్స్ వెబ్ సైట్ లో పొందుపరచటం జరుగుతుంది, వినియోగదారులు వెబ్ సైట్ నుండి వాటిని సేకరించవచ్చు.</p> |
| 17. | CGRF వారి పర్యటనలు పెంచాలి, ముందస్తు ప్రచారం జరగాలి. | <p>i) CGRF ఫోరమ్ తెలంగాణ స్టేట్ ఎలక్ట్రిసిటీ రెగ్యులేటరీ కమిషన్ యొక్క 2015 రెగ్యులేషన్ నంబర్ 03లోని క్లాజ్ 2.3లో పేర్కొన్న విధంగా స్థానిక కోర్టులను నిర్వహిస్తోంది.</p> <p>ii) ప్రచారానికి సంబంధించి, స్థానిక కోర్టులను నిర్వహించే సెక్షన్ లను ముందుగానే గర్హించి, దిన పత్రికలలో ముందస్తుగా తేదీలను ప్రకటించటం జరుగుచున్నది.10</p> |

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| 18. | CGRF ఆర్డర్ల అమలు కొరకు డిస్కాంబు ప్రత్యేక వ్యవస్థ ను ఏర్పాటు చేసి, పని పూర్తి అయిన తరువాత వినియోగ దారుడితో తప్పక దృవీకరించు కోవాలి. | CGRF ఆదేశాలను ఎప్పటికప్పుడు DISCOM లోని వ్యవస్థ పరిశీలిస్తున్నది. |
| 19. | ఆఫీసుల్లోనే పనిచేస్తూ పర్యవేక్షణ కొరకు బయటకు వెళ్ళని వారి కార్ల సౌకర్యాన్ని రద్దు చేసి సామూహిక బస్సు సౌకర్యం కల్పించాలి. | అధికారులకు బస్సు సౌకర్యం కల్పించడం సాధ్యం కాదు. డిపార్టుమెంటు పరంగా కార్లను వినియోగించే అధికారులకు రవాణా భత్యం మరియు ప్రయాణ భత్యాలు చెల్లించడం లేదు.. |
| 20. | సబ్ స్టేషన్ నుండి ప్రతి రైతు కనెక్షన్ వరకు న్యూట్రల్ వైరు లాగాలి | దశలవారీగా పనులు చేపట్టనున్నారు |
| 21. | రైతుల యొక్క సర్వే నెంబర్లు, సర్వే నెంబర్లను అనుకొని ఉన్న సహజ నీటి వనరులైన ఒరెలు, వాగులు, కాలువలలో మోటారు పెట్టుకునేందుకు రైతులు డిడి చెల్లిస్తే అట్టి కనెక్షన్ ఇచ్చిన అధికారులకు నోటీసులు పంపిస్తున్నారు క్రిందికి వృధాగా పోతున్న నీటిని రైతులు వాడుకుంటున్నప్పుడు, అధిక వర్షాలు కురిసినప్పుడు సహజ నీటి ప్రవాహం ఎక్కువైతే నష్టపోయేది రైతే. నీరు అధికమైనప్పుడు భూమి కోతకు గురి అవుతుంది. నీటి అవసరమున్నప్పుడు ఆ నీటిని వాడుకుంటాడు. అది రైతు హక్కు. ఇట్టి వసతి కొరకై విద్యుత్ కనెక్షన్ ఇవ్వాలి. | AGL దరఖాస్తుదారు నీటిపారుదల అధికారుల నుండి అభ్యంతరం లేని సర్టిఫికేట్ (NOC) పొందిన తర్వాత మరియు జిల్లా కలెక్టర్ సమ్మతితో చెరువులు, వరద కాలువల ద్వారా ఒక ప్రదేశం నుండి మరొక ప్రదేశానికి నీటిని పంపింగ్ చేసిన తర్వాత విద్యుత్ కనెక్షన్ కోసం దరఖాస్తు చేసుకోవచ్చు. |
| 22. | శ్రీరామ్ సాగర్ ప్రాజెక్టు వరద కాలువ పై నూతన కనెక్షన్లు ఇవ్వడం లేదు. రైతులకు జీవనాధారమైన అత్యంత విలువైన భూమిని వరద కాలువ కోసమే ఇచ్చిన రైతులకు ఆ నీటిని వాడుకోవటానికి | గురుత్వాకర్షణ ద్వారా నీటిపారుదల అవసరాల కోసం చెరువులలో నీటిని నింపడానికి ఇరిగేషన్ కాలువను ఉపయోగిస్తారు. ఒకవేళ నీటిపారుదల కాలువ |

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| | అడ్డుపడటం విచారకరం. గత ప్రభుత్వం రైతులు మోటార్ల ద్వారా నీరందించుకున్న ఎకరాలను తామే సాగులోకి తీసుకు వచ్చిన విధంగా ప్రకటించుకుంది. రైతులు పంట రక్షణ కొరకు ఎక్కడి నుంచి అయినా నీటిని తరలించవచ్చని చట్టంలో ఉంది. అందుకని అడిగిన వెంటనే నీటివనరుల వద్ద కూడా కనెక్షన్ ఇవ్వాలి | నుండి నేరుగా AGL కనెక్షన్ ద్వారా నీటిని పంప్ చేయవలసి వస్తే, నీటిపారుదల శాఖ నుండి NOC తీసుకోవటం తప్పనిసరి. |
| 23. | డిపార్ట్మెంట్ వారి నిర్లక్ష్యం కారణంగా మరణానికి గురి అవుతున్న "రైతు హత్యలను" ఆపాలి. విద్యుత్ పాక్ కు గురి అయిన చనిపోయిన వారికి ఇచ్చే ఆర్థిక సహాయాన్ని రెట్టింపు చేయాలి. మరణించిన పశువులకు ఇచ్చే ఆర్థిక సాయాన్ని లక్ష రూపాయలుగా చేయాలి. గొర్రెలు మేకలకు Rs 12000/- చేయాలి. | ఎక్స్ గ్రేషియా చెల్లింపునకు గౌరవప్రదమైన TGERC ఆదేశాలను DISCOM అనుసరిస్తుంది. |
| 24. | విద్యుత్ పాక్ కు గురి అయి ఆసుపత్రిలో చేరి ప్రాణం దక్కిన వారి ఆస్పత్రి ఖర్చులను డిపార్ట్మెంట్ వారు భరించాలి. వికలాంగులుగా మారితే అతనికి జీవన భృతిని ఇవ్వాలి. | డ్యూటీలో ఉన్నప్పుడు ఎలక్ట్రికల్ నాన్-ఫాటల్ యాక్సిడెంట్కు గురైన ఉద్యోగులు/ఆర్బిసన్ లకు TGNPDCL ద్వారా గుర్తింపు పొందిన ఆసుపత్రిలో ఇన్ పేషెంట్ గా ఉన్నప్పుడు మెడికల్ క్రెడిట్ కార్డ్ సౌకర్యాన్ని TGNPDCL అందిస్తోంది. ఎలక్ట్రికల్ నాన్-ఫాటల్ యాక్సిడెంట్కు గురైన Un-manned కార్మికులకు బోర్డు ఆమోదం ప్రకారం మెడికల్ క్రెడిట్ కార్డ్ సౌకర్యం కూడా అందించబడుతుంది. |
| 25. | సిజిఆర్ఎఫ్ ఫోర్ట్ మెంబర్ కు రోజువారీ సిట్టింగ్ Fee ప్రస్తుతం ఉన్న దానిని రెట్టింపు చేయాలి. | స్వతంత్ర సభ్యుని యొక్క సిట్టింగ్ రుసుము లేదా ఇతర అలవెన్సులతో కూడిన వేతనం గౌరవనీయమైన TGERC ద్వారా ఎప్పటికప్పుడు నిర్ణయించబడుతుంది మరియు లైసెన్సుదారుచే భరించబడుతుంది. |
| 26. | ప్రయాణ ఖర్చులు బస్సు రైలు చార్జీలు మరియు వాస్తవ ప్రయాణ | G.O. Ms.No.60, Dt:02-05-2015, r/wలో జారీ చేసిన ఉత్తర్వుల ప్రకారం |

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| | సమయం లో అయ్యే భోజన నివాస ఖర్చులు చెల్లించాలి. దీనికిగాను ఒక కిలో మీటర్ కు ఇంత మొత్తం అని నిర్ణయించాలి. | మరియు TOO Ms.No.155, Dt:17-08-2015, NOO Ms.No.171, Dt:31-08-2015 ప్రకారం ప్రయాణ మరియు రోజువారీ భత్యాలు మరియు బస & బోర్డింగ్ ఛార్జీలు ఇప్పటికే నిర్ణయించబడ్డాయి మరియు చెల్లించబడుతున్నాయి. |
| 27. | ప్రభుత్వ రంగంలో విద్యుత్ సేవలు కొనసాగాలంటే కాలానుగుణంగా పెరిగిన ధరల వేతనాలు విద్యుత్ కొనుగోలు ఇతర ఖర్చులు పెరిగిన విధంగానే టారిఫ్ కూడా, చెల్లించ గలిగే స్తోమతను బట్టి పెంచాలి. సుదీర్ఘకాలం పెంచకుండా ఉంటే డిస్కంల మనుగడ కష్టం అయ్యి విద్యుత్తు సరఫరా పైవేటు రంగానికి బదిలీ అయ్యే అవకాశం ఉంది. | ప్రభుత్వ రంగంలో విద్యుత్ సేవలు కొనసాగించడానికి, విద్యుత్ వినియోగదారుల ఆర్థిక స్తోమతను బట్టి టారిఫ్ ప్రతిపాదనలు నిర్ణయించి గౌరవనీయమైన కమీషన్ ముందు పొందు పరచటం జరిగినది. |
| 28. | HD DOMESTIC వినియోగదారులనుతప్పదోవ పట్టించి 33kv సబ్ స్టేషన్ పెట్టుకోవాల్సి వస్తున్నది.నగరాలలో భూమి కొరత కారణంగా 33 kv సబ్ స్టేషన్ పెట్టుకోలేరు. వాస్తవ వినియోగాన్ని మాత్రమే లెక్కించాలి. కనెక్టెడ్ వినియోగాన్ని లెక్కించరాదు. ఫైర్ ఎక్స్‌ప్రెంట్ ను లెక్కించరాదు. | — |
| 29. | TSSPDCL, TSNPDCL CMD లు గా ఐఏఎస్ అధికారులు సేవలు అందించడానికి వచ్చి, వినియోగదారునికి సత్వర నిజాయితీ సేవలు అందించే ప్రయత్నం చేస్తున్నందుకు వారికి ధన్యవాదాలు. | — |
| 30. | TSNPDCL వారు కాలిపోయిన DTR లు రవాణా ఎంత పర్సెంటేజీ చేశాము అని, దుర్మరణాలకు కారణాలేంటి అని అన్ని వివరాలు వ్రాశారు వారికి ధన్యవాదాలు, TSSPDCL వారు కూడా వివరాలు ఇవ్వాలి, కరెంటు స్తంభాలు పడి చనిపోయిన రైతుల లెక్క కూడా | — |

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| | ఇవ్వాలి. సెన్ సిరిసిల్ల వారు ARR లో వారి లెక్కలు మినహా ఎటువంటి సేవల వివరాలు ఇవ్వలేదు. వారు కూడా అన్ని వివరాలు ఇవ్వాలి. | |
| 31. | క్యాటగిరి వివరాలు అన్ని విద్యుత్తు ఆఫీసుల్లో ప్రదర్శించాలి. | TGNPDCL వెబ్ సైట్ లో (www.tgnpdcl.com) అన్ని కేటగిరి ల వివరాలు పొందు పరచబడ్డాయి, వినియోగదారులు వాటిని ఉచితంగా పరిశీలించవచ్చును. |
| 32. | వ్యవసాయ విద్యుత్ సరఫరా కాస్టు ఎంత, టారిఫ్ ఎంత, ప్రస్తుతం ప్రభుత్వంచెల్లిస్తున్నది ఎంత తెలియచేయాలి. | గౌరవనీయమైన కమిషన్ వారు ఆర్థిక సంవత్సరం 2023-24 కు జారీ చేసిన టారిఫ్ ఆర్డర్ ప్రకారం 2023-24 ఆర్థిక సంవత్సరానికి TGNPDCL కి సంబంధించిన వ్యవసాయ విద్యుత్ సరఫరా కాస్ట్ రూ.7,332 కోట్లు (యూనిట్ ఒక్కంటికి రూ. 8.73 / -) అందులో ప్రభుత్వం వ్యవసాయ సబ్సిడీ క్రింద చెల్లిస్తున్నది రూ. 6,733 కోట్లు. |
| 33. | ప్రస్తుత నీటిపారుదల శాఖ వారు HD LIFT ఇరిగేషన్ వారు చెల్లించాల్సిన బిల్లులు వెంట వెంటనే వసూలు చేయాలి. | పెండింగ్లో ఉన్న బకాయిల చెల్లింపు కోసం నీటిపారుదల శాఖతో క్రమం తప్పకుండా చర్యలు తీసుకోవడం జరుగుచున్నది. |
| 34. | హైదరాబాద్ పోత్ సర్కిల్ కు సప్లై చేసే విద్యుత్తు ఎంత,వసూలు చేసేది ఎంత వివరాలు ఇస్తూ, వీరి బిల్లులు సరిగా వసూలు చేసే విధంగా చూడాలి. | — |

5వ నియంత్రణ కాలము యొక్క ఆర్థిక సంవత్సరాలకు (2024-25 నుండి 2028-29వరకు) రిటైల్ సప్లయి వ్యాపారము కోసము సమగ్ర ఆదాయ ఆవశ్యకత మరియు 2024-25 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి, ధరల ప్రతిపాదనలు & క్రాస్ సబ్సిడీ సర్పార్జీ ప్రతిపాదనలపై అన్నదేవి పర్యరాములు, గ్రామము -చంద్రంపేట జిల్లా - రాజన్న సిరిసిల్ల గారి సూచనలు/సలహాలకుసమాదానాలు

| క్రమసంఖ్య | అభ్యంతరాలు /సూచనలు | TGNPDCL - సమాదానాలు |
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| 1. | రైతులకు సంబంధించిన AGL ట్రాన్స్‌ఫార్మర్లు కాలిపోతున్నాయి ఈ విషయము గురించి గా రోజుల క్రింద నుండి చెస్పారికి చెప్పినా ఎటువంటి చర్యలు తీసుకోవడము లేదు. ట్రాన్స్‌ఫార్మర్లు రోడ్డు పక్కన వేయకుండా రైతులకు ఇబ్బంది కరంగా పత్తి చేనులో మరియు పొలము లో వేసినారు. ఈ ట్రాన్స్‌ఫార్మర్లు కాలిపోయినపుడు మార్పడం చాలా ఇబ్బందికరంగా ఉన్నది. కావున మా రైతులందరియందు దయ తలచి ట్రాన్స్‌ఫార్మర్లు రోడ్డుకు వేయగలరని మా రైతులందరి యొక్క మనవి. ట్రాన్స్‌ఫార్మర్ కాలిపోయినపుడు లోపల ఉండడం వలన నెల రోజులు అయినా ట్రాన్స్‌ఫార్మర్ బిగించడం లేదు . దానివలన కరెంటు సప్లై లేక పంట నష్టం జరుగుచున్నది . అధికారుల నిర్లక్ష్యం వలన పంట నష్టం జరుగుతున్నది. ఈ పంట నష్టం అధికారులే భరించాలి అని మా యొక్క మనవి. | లైసెన్స్ పరిధి లో లేని అంశం. |

Replies to the Objections/Suggestions raised on Distribution Business ARR & Wheeling Tariff Proposals for 5th Control Period and Retail Supply Business ARR for 5th Control Period & FPT including Cross Subsidy Surcharge for the FY 2024-25 by M/s Sai Venkata Agro Industries Pvt. Ltd., Mulkalla, Mancherial.

| S.No. | Summary of Objections / Suggestions | Response of the Licensee |
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| 1 | <p>At the time of setting up our new industry (cotton ginning and pressing factory) at Village Mulkalla, Mancherial Division, our power requirement load was 800 KVA. This load was sanctioned to our industry at 33 KV level in the month of November, 2009. Accordingly, our power bills were eligible and required to be billed with 33 KV tariff in accordance with the Tariff Order for 2010-11 and onwards. But mistakenly, our electricity bills were issued with 11 KV tariff instead of 33 KV tariff. A copy of the Tariff Order 2010-11 is enclosed herewith for your kind perusal. In the said order, it is very clearly mentioned that the tariff shall be levied as per the actual supply voltage. Thus, as per the Tariff Order for 2010-11 and subsequent years, our industry had to be charged the power bills at the tariff of 33 KV and not for 11 KV. We did not observe the rate and paid the bills issued with 11 KV tariff. Later on, when we made two representations, the first one on 04.07.2014 and the second one on 06.10.2015 to revise our bills with the 33 KV tariff. In the first representation, our bills were not revised. But in the second representation, the bills were revised with 33 KV tariff, and the excess billed amount was withdrawn, and the matter was settled.</p> <p>But to our surprise, the demand for the adjusted amount was again raised consequent to the objections made by your Internal Auditors. Then, we again made a request to remove the demand amount as the audit objection was not proper in accordance with the clear guidelines given in the Tariff Order 2010-11. Sir, we firmly believe that the Department is bound to collect</p> | <p>In compliance to the Hon'ble High Court of Telangana order against WP.No. 41056 of 2014, the speaking orders were issued to M/s. Sai Venkata Agro Industries Pvt Ltd, Sc.No MCL-035 Mulkalla(V), Mancherial district, vide Lr.No.SE/OP/MNCL/SAO/JAO(HT)/SA/D.No.311/24,Dt.25.05.2024 that your representation dated 04.07.2014 is hereby rejected.</p> |

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| <p>the power charges strictly in accordance with the tariff order only and not more than the prescribed charges. But even then, our bonafide request was not considered by the Department.</p> <p>We were then left with no other option but to file a case at the CGRF and Hon'ble CGRF agreed with our view and was pleased to pass an order in C.G. No. 41 of 2016 in our favour. We then approached the Superintendent Engineer for the implementation of the order, but he did not implement the order of the CGRF and instead filed a case before the Hon'ble High Court against the order of the CGRF.</p> <p>OUR SUBMISSIONS</p> <p>Sir, the Department is duty-bound to strictly collect the power charges as per the Tariff Order issued by the ERC and nothing more than the prescribed tariff. There is no dispute that our service agreement was for an 11 KV tariff in the year 2009 in accordance with the conditions laid in the sanction letter, and we have paid the bills accordingly because in the Tariff Order for the year 2009-10, there was no mention about the tariff based on actual supply voltage in the said order.</p> <p>However, the Tariff Order for the year 2010-11 as applicable from 01.08.2010 makes it very clear to collect the charges as per the actual supply voltage. Therefore, in our case, it should be collected as per 33 KV as it is the actual supply voltage. Sir, when the Tariff rules for the year 2010-11 came into force with effect from 01.08.2010, the Department is duty-bound to</p> | |
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| <p>implement the new rules in all aspects. In our case, the Department has implemented only the increased per unit charges of power without implementing the changed rule with regard to tariff billing as per the actual supply voltage. Thus, the Department has violated and not followed the ERC Tariff Order for the year 2010-11 and onwards.</p> <p>Sir, we believe that instead of we making a request from our side, the Department should have suo moto implemented the new Tariff Order and revised our bills with effect from 01.08.2010 but was finally done only after our second representation made on 06.10.2015.</p> <p>OUR PRESENT REQUEST</p> <p>You may be aware that the cotton industry has suffered huge losses and the majority of the units in our area have gone bankrupt. We too are no exception to it and have already closed our industry due to huge losses and financial crunch. Nevertheless, we are ready to pay the power dues as per the Tariff Order for 2010-11 and close the matter permanently. Hence, we kindly request you to consider our bonafide request and issue us revised bills in accordance with the Tariff Order for 2010-11. We also request you to kindly withdraw the appeal filed before the Honorable High Court and kindly implement the order passed by the Hon'ble CGRF in C.G. No. 41 of 2016. If any amount is further payable after removing the shortfall, we are ready to pay the same and close the matter forever. We may be given a chance to explain our grievance during the public hearing to be held at Nizamabad on 24.10.2024.</p> | |
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**5వ నియంత్రణ కాలము యొక్క ఆర్థిక సంవత్సరాలకు (2024-25 నుండి 2028-29వరకు) రిటైల్ సప్లయి వ్యాపారము కోసము సమగ్ర ఆదాయ
ఆవశ్యకత మరియు 2024-25 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయి వ్యాపారానికి, ధరల ప్రతిపాదనలు & క్రాస్ సబ్సిడీ సర్పార్ట్ ప్రతిపాదనలపై
ఓరుగంటి రామకృష్ణ, సిరిసిల్ల జిల్లా - రాజన్న సిరిసిల్ల గారి సూచనలు/సలహాలకు సమాదానాలు**

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| 1. | సెస్సు ఉద్యోగులను ఒకే చోట చాలా సంవత్సరాలు ఉంచటం మూలంగా కొంతమంది అండదండలతోటి రైతుల వద్ద డబ్బులు వసూలు చేస్తూ చిట్టిలు నడుపుతున్నారు . అలాంటి చిట్టిల గురించి చాలాసార్లు తెలుపడం జరిగింది . ట్రాన్స్ఫర్మర్ కాలిపోతే తేవడం గురించి ఇలాంటి వాటికి పాల్పడుతున్నారు . | లైసెన్స్ పరిధి లో లేని అంశం. |
| 2. | రైతులకు పొలంవద్ద పడిపోయిన ట్రాన్స్ఫర్మర్ కాలిపోయినా సకాలంలో సేవలు అందించడంలేదు తద్వారా రైతులు చాలా నష్టపోతున్నారు | లైసెన్స్ పరిధి లో లేని అంశం. |
| 3. | ఇంటి మీటర్ గురించి కేటగిరి-I తీసుకున్నప్పుడు రేట్లను పెంచారు సామాన్య ప్రజలకు ఇబ్బంది గా ఉంది | లైసెన్స్ పరిధి లో లేని అంశం. |
| 4. | నూతన ఇంటి నిర్మాణం చేసుకుంటున్న సమయములో కేటగిరి-II కింద ఇస్తున్నారు దాన్ని కేటగిరి-I ఇవ్వాలి | లైసెన్స్ పరిధి లో లేని అంశం. |
| 5. | నేను సంఘ సభ్యుడైనను సెస్సు గురించి ఎలాంటి సమాచారం అడిగిన ఇవ్వడం లేదు. CESS సహకార సంఘ సభ్యత్వం ఇవ్వక మరి ఎవరికీ ఇస్తారు. | లైసెన్స్ పరిధి లో లేని అంశం. |
| 6. | కరెంటు సప్లయి సరైన సమయం లో అందించనియెడల రైతులకు ఎలాంటి పంట నష్టం జరిగినా ఆ సంబంధిత అధికారులు హెల్పర్ నుండి | లైసెన్స్ పరిధి లో లేని అంశం. |

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| | <p>ఎండ్ వరకు నష్టపరిహారం రైతులకు ఇప్పించాలి అధికారులకు జరిమానా వేయాలి.</p> | |
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Replies to the Objections/Suggestions raised on Retail Supply Business ARR for 5th Control Period & FPT including Cross Subsidy Surcharge for the FY 2024-25 and Distribution ARR & Wheeling Tariff Proposals for 5th Control Period by M/s. MPL Steel Industries Private Ltd, Regd. Off: 13-6-439/1/A/111/12&11, MPL House, Pillar No. 75, Balaji Nagar, Mehadipatnam Ring Road, Hyderabad-500006.

| S.No | Summary of Objections / Suggestions | Response of the Licensee |
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| 1 | We are very much thankful to your good office for supporting Telangana industry from time and again. TSERC constituted on 3rd November 2014, with prime focus of protecting the interests of the consumers. | - |
| 2 | <p>We wish to draw your attention to the severe crisis already faced by the steel industry in Telangana. Any further increase in charges, including ARR, Wheeling Charges, and Cross Subsidy surcharge, additional surcharges, will place heavy burden on our industry, which is currently struggling to remain viable in an increasingly competitive market.</p> <p>We are deeply concerned about the proposed increases in ARR, Wheeling, and Cross Subsidy surcharge and additional surcharge, which will place an unsustainable burden on the steel industry. This increase will severely affect our industry's viability, which is already facing economic pressures.</p> <p>We are particularly concerned about the effect on Green Energy. Solar energy is being generated at an impressive rate of approximately 1,20,000 units per month per MW, but with the proposed wheeling charges an additional burden of approximately ₹3 per unit is levied by which there is a real risk of discouraging further investment in green energy. This not only goes against the spirit of promoting renewable energy but also puts the steel industry in Telangana at a disadvantage in comparison to other states</p> | <p>Discoms have proposed uniform wheeling charges across voltage levels similar to intra state and inter- State transmission charges to encourage open access consumption across all voltage levels. Moreover, having uniform wheeling charges will lead to simplified tariff structure, bring in transparency in billing process and would help in streamlining the process of grid planning going further. This would also help in improving administrative efficiency and lead to better resource allocation and lesser disputes related to undue variations in wheeling charges being levied on consumers.</p> <p>In case of injection of RE power at one voltage system and withdrawal at other voltage system, the proposal for uniform wheeling losses will help the open access consumers in reduction of energy losses on the scheduled energy unlike the voltage wise losses in the conventional system. This will benefit the open access consumers at all voltage levels. The Hon' ble Commission has exempted the applicability of Additional surcharge on the GEOA consumers in the order issued on additional surcharge.</p> |

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| <p>in terms of renewable energy adoption and sustainability initiatives.</p> <p>The proposal of standby charges on green energy open access consumers equivalent to Temporary Supply Tariffs based on the extent of open access energy and demand, further discourages the adoption of green energy. This makes open access unfeasible, hindering both economic and environmental progress in Telangana.</p> <p>We urge the Hon'ble Commission to reconsider the proposed charges to ensure a conducive environment for the industry.</p> <p>We request an opportunity to present these concerns in detail during the upcoming public hearings.</p> | <p>However, as per the Electricity (Promoting Renewable Energy through Green Energy Open Access) Rules 2022, the additional surcharge is exempted for GOEA consumers and stand by charges are applicable for all the OA consumers including GEOA. Hence, the DISCOM has proposed the stand by charges in its fillings.</p> |
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Replies to the Objections/Suggestions raised on Retail Supply Business ARR for 5th Control Period & FPT including Cross Subsidy Surcharge for the FY 2024-25 and Distribution ARR & Wheeling Tariff Proposals for 5th Control Period by M/s. Mahalakshmi Profiles Pvt. Ltd., Regd. Off: MPL House, 13-6-439/1/A/111/10 & 11, Balaji Nagar, Pillar No. 75, Mehadipatnam Ring Road, Hyderabad-500006.

| S.No | Summary of Objections / Suggestions | Response of the Licensee |
|------|---|---|
| 1 | <p>Dear Sir,</p> <p>We are very much thankful to your good office for supporting Telangana industry from time and again. TSERC constituted on 3rd November 2014, with prime focus of protecting the interests of the consumers. Inlight of this, we trust that the Commission will carefully consider our concerns in line with this mandate.</p> <p>We wish to draw your attention to the severe crisis already faced by the steel industry in Telangana. Any further increase in charges, including ARR, Wheeling Charges, and Cross Subsidy surcharge, additional surcharges, will place heavy burden on our industry, which is currently struggling to remain viable in an increasingly competitive market.</p> <p>We are deeply concerned about the proposedincreases in ARR, Wheeling, and Cross Subsidy surcharge and additional surcharge, which will place an unsustainable burden on the steel industry. This increase will severely affect our industry's viability, which is already facing economic pressures.</p> | <p>Discoms have proposed uniform wheeling charges across voltage levels similar to intra state and inter-state transmission charges to encourage open access consumption across all voltage levels. Moreover, having uniform wheeling charges will lead to simplified tariff structure, bring in transparency in billing process and would help in streamlining the process of grid planning going further. This would also help in improving administrative efficiency and lead to better resource allocation and lesser disputes related to undue variations in wheeling charges being levied on consumers.</p> |

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| <p>We also request that the difference in charges for 11KV, 32KV, and 132KV be maintained at earlier levels to ensure fairness and competitiveness across various industries. 132KV has significantly lower transmission losses compared to 11KV and 33KV, and industries have invested heavily in the infrastructure for 132KV. It is crucial that these differences be recognized in the tariff structure.</p> <p>We urge the Hon'ble Commission to reconsider the proposed charges to ensure a conducive environment for the industry.</p> <p>We request an opportunity to present these concerns in detail during the upcoming public hearings.</p> <p>Thank you for your attention to this urgent matter.</p> | |
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**Replies to the Objections/Suggestions raised on Retail Supply Business ARR for 5th Control Period & FPT including Cross Subsidy Surcharge for the FY 2024-25 and Distribution ARR & Wheeling Tariff Proposals for 5th Control Period by M/s. Rayalaseema Industries (India) Pvt. Ltd.,
Regd. & Corporate Office: B301, 8-2-618/2A to C, Road No.11, Banjarahills, Hyderabad-500034.**

| S.No. | Summary of Objections / Suggestions | Response of the Licensee |
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| 1 | We are very much thankful to your good office for supporting Telangana industry from time and again. TSERC constituted on 3rd November 2014, with prime focus of protecting the interests of the consumers. In light of this, we trust that the Commission will carefully consider our concerns in line with this mandate. | - |
| 2 | <p>We wish to draw your attention to the severe crisis already faced by the steel industry in Telangana. Any further increase in charges, including ARR, Wheeling Charges, and Cross Subsidy surcharge, additional surcharges, will place heavy burden on our industry, which is currently struggling to remain viable in an increasingly competitive market.</p> <p>We are deeply concerned about the proposed increases in ARR, Wheeling, and Cross Subsidy surcharge and additional surcharge, which will place an unsustainable burden on the steel industry. This increase will severely affect our industry's viability, which is already facing economic pressures.</p> <p>We urge the Hon'ble Commission to reconsider the proposed charges to ensure a conducive environment for the industry.</p> <p>We request an opportunity to present these concerns in detail during the upcoming public hearings.</p> | <p>Discoms have proposed uniform wheeling charges across voltage levels similar to intra state and inter- State transmission charges to encourage open access consumption across all voltage levels. Moreover, having uniform wheeling charges will lead to simplified tariff structure, bring in transparency in billing process and would help in streamlining the process of grid planning going further. This would also help in improving administrative efficiency and lead to better resource allocation and lesser disputes related to undue variations in wheeling charges being levied on consumers.</p> |

Replies to the Objections/Suggestions raised on Retail Supply Business ARR for 5th Control Period & FPT including Cross Subsidy Surcharge for the FY 2024-25 and Distribution ARR & Wheeling Tariff Proposals for 5th Control Period by M/s. SCAN ENERGY & POWER LIMITED Office: B301, 8-2-618/2A to C, 3rd Floor, Delta Seacon, Road No.11, Banjara Hills, Hyderabad-500034.

| S.No. | Summary of Objections / Suggestions | Response of the Licensee |
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| 2 | <p>We are very much thankful to your good office for supporting Telangana industry from time and again. TSERC constituted on 3rd November 2014, with prime focus of protecting the interests of the consumers. In light of this, we trust that the Commission will carefully consider our concerns in line with this mandate.</p> | - |
| | <p>We wish to draw your attention to the severe crisis already faced by the steel industry in Telangana. Any further increase in charges, including ARR, Wheeling Charges, and Cross Subsidy surcharge, additional surcharges, will place heavy burden on our industry, which is currently struggling to remain viable in an increasingly competitive market.</p> <p>We are deeply concerned about the proposed increases in ARR, Wheeling, and Cross Subsidy surcharge and additional surcharge, which will place an unsustainable burden on the steel industry. This increase will severely affect our industry's viability, which is already facing economic pressures.</p> <p>We urge the Hon'ble Commission to reconsider the proposed charges to ensure a conducive environment for the industry.</p> <p>We request an opportunity to present these concerns in detail during the upcoming public hearings.</p> | <p>Discoms have proposed uniform wheeling charges across voltage levels similar to intra state and inter- State transmission charges to encourage open access consumption across all voltage levels. Moreover, having uniform wheeling charges will lead to simplified tariff structure, bring in transparency in billing process and would help in streamlining the process of grid planning going further. This would also help in improving administrative efficiency and lead to better resource allocation and lesser disputes related to undue variations in wheeling charges being levied on consumers.</p> |

Replies to the Objections/Suggestions raised on Retail Supply Business ARR for 5th Control Period & FPT including Cross Subsidy Surcharge for the FY 2024-25 and Distribution ARR & Wheeling Tariff Proposals for 5th Control Period by M/s. Anand Ispat Udyog Ltd., Office: 5-8-363 to 365, A&B, 3rd Floor, Chirag Ali Lane, Adid Road, Hyderabad-500001.

| S.No | Summary of Objections / Suggestions | Response of the Licensee |
|------|---|---|
| 1 | <p>Dear Sir,</p> <p>We are very much thankful to your good office for supporting Telangana industry from time and again. TSERC constituted on 3rd November 2014, with prime focus of protecting the interests of the consumers. Inlight of this, we trust that the Commission will carefully consider our concerns in line with this mandate.</p> <p>We wish to draw your attention to the severe crisis already faced by the steel industry in Telangana. Any further increase in charges, including ARR, Wheeling Charges, and Cross Subsidy surcharge, additional surcharges, will place heavy burden on our industry, which is currently struggling to remain viable in an increasingly competitive market.</p> <p>We are deeply concerned about the proposedincreases in ARR, Wheeling, and Cross Subsidy surcharge and additional surcharge, which will place an unsustainable burden on the steel industry. This increase will severely affect our industry's viability, which is already facing economic pressures.</p> | <p>Discoms have proposed uniform wheeling charges across voltage levels similar to intra state and inter-state transmission charges to encourage open access consumption across all voltage levels. Moreover, having uniform wheeling charges will lead to simplified tariff structure, bring in transparency in billing process and would help in streamlining the process of grid planning going further. This would also help in improving administrative efficiency and lead to better resource allocation and lesser disputes related to undue variations in wheeling charges being levied on consumers.</p> |

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| | <p>We also request that the difference in charges for 11KV, 32KV, and 132KV be maintained at earlier levels to ensure fairness and competitiveness across various industries. 132KV has significantly lower transmission losses compared to 11KV and 33KV, and industries have invested heavily in the infrastructure for 132KV. It is crucial that these differences be recognized in the tariff structure.</p> <p>We urge the Hon'ble Commission to reconsider the proposed charges to ensure a conducive environment for the industry.</p> <p>We request an opportunity to present these concerns in detail during the upcoming public hearings.</p> <p>Thank you for your attention to this urgent matter.</p> | |
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Replies to the Objections/Suggestions raised on Retail Supply Business ARR for 5th Control Period & FPT including Cross Subsidy Surcharge for the FY 2024-25 and Distribution ARR & Wheeling Tariff Proposals for 5th Control Period by M/s. DILIP RE-ROLLING PVT LTD, Office: 21-1-414, Rikabgunj, Hyderabad-500002.

| S.No | Summary of Objections / Suggestions | Response of the Licensee |
|------|---|---|
| 1 | <p>Dear Sir,</p> <p>We are very much thankful to your good office for supporting Telangana industry from time and again. TSERC constituted on 3rd November 2014, with prime focus of protecting the interests of the consumers. Inlight of this, we trust that the Commission will carefully consider our concerns in line with this mandate.</p> <p>We wish to draw your attention to the severe crisis already faced by the steel industry in Telangana. Any further increase in charges, including ARR, Wheeling Charges, and Cross Subsidy surcharge, additional surcharges, will place heavy burden on our industry, which is currently struggling to remain viable in an increasingly competitive market.</p> <p>We are deeply concerned about the proposedincreases in ARR, Wheeling, and Cross Subsidy surcharge and additional surcharge, which will place an unsustainable burden on the steel industry. This increase will severely affect our industry's viability, which is already facing economic pressures.</p> | <p>Discoms have proposed uniform wheeling charges across voltage levels similar to intra state and inter-state transmission charges to encourage open access consumption across all voltage levels. Moreover, having uniform wheeling charges will lead to simplified tariff structure, bring in transparency in billing process and would help in streamlining the process of grid planning going further. This would also help in improving administrative efficiency and lead to better resource allocation and lesser disputes related to undue variations in wheeling charges being levied on consumers.</p> |

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| | <p>We also request that the difference in charges for 11KV, 32KV, and 132KV be maintained at earlier levels to ensure fairness and competitiveness across various industries. 132KV has significantly lower transmission losses compared to 11KV and 33KV, and industries have invested heavily in the infrastructure for 132KV. It is crucial that these differences be recognized in the tariff structure.</p> <p>We urge the Hon'ble Commission to reconsider the proposed charges to ensure a conducive environment for the industry.</p> <p>We request an opportunity to present these concerns in detail during the upcoming public hearings.</p> <p>Thank you for your attention to this urgent matter.</p> | |
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**Replies to the Objections/Suggestions raised on Distribution Business ARR & Wheeling Tariff Proposals for 5th Control Period and Retail Supply Business ARR for 5th Control Period & FPT including Cross Subsidy Surcharge for the FY 2024-25 by M/s. Jeevaka Industries Pvt. Ltd., Adm.
Office, 11-6-27/17, 1st Floor, Opp: IDPL Factory, Balanagar, Hyderabad-500037.**

| S.No. | Summary of Objections / Suggestions | Response of the Licensee |
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| 1 | The instant petitions have been filed by TG discoms for the determination of ARR & Wheeling Tariffs for Distribution Business for FY 2024-29 and determination of ARR for Retail Supply Business for FY 2024-29 & Tariff Proposals for FY 2024-25. The instant petition has been filed by both the discoms under the Telangana State Electricity Regulatory Commission (Multi Year Tariff) Regulation, 2023 (MYT Regulations 2023). | Noted. |
| 2 | <p>Multi-year Tariff for FY 2024-29 – Regulation 6 of the TSERC (Multi Year Tariff) Regulation, 2023 provides for the filing of the MYT petition by 30th November. The relevant extracts of the same are reproduced as under:</p> <p><i>"6 Procedure for filing Petition</i></p> <p><i>6.2 The petitions to be filed for each Control Period under this Regulation area under:</i></p> <p><i>b) Multi Year Tariff petition shall be filed by 30th November of the year preceding the first year of the Control Period by transmission licensee, distribution licensee (for wheeling business) and SLDC comprising:</i></p> <p><i>i. True-up of preceding year;</i></p> <p><i>ii. Aggregate Revenue Requirement for each year of the Control Period;</i></p> <p><i>iii. Proposal of Tariff and Charges for each year of the Control Period.</i></p> <p><i>c) Multi Year Tariff petition shall be filed by 30th November of the year preceding the first year of the Control Period by distribution licensee (for retail supply business) comprising:</i></p> <p><i>i. True-up of preceding year;</i></p> | <p>When the Regulation No.2 of 2023 was notified on 30.12.2023, the TGDISCOMs were seeking clarifications on certain clauses of the new MYT Regulation No.2 of 2023 as there was huge impact on the financials of the DISCOMs and also there was a change in regulatory regime because of which DISCOMs needed to collect additional data for preparing the petitions, then the TGDISCOMs have initiated the process of collecting the required data from the various wings for which it took time.</p> <p>Subsequently, the Gruhajyothi Scheme was announced by the GoTG which further delayed the process of Filings of ARR. Meanwhile, Model code of conduct came into force, due to which the TGDISCOMs could not file the ARR filings. The DISCOMs have duly submitted the condonation of delay petition before the Hon'ble Commission stating these reasons.</p> <p>The filings of true up application would be filed separately along with Annual Performance Review of Distribution Business for FY 2023-24.</p> |

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| | <p><i>ii. Aggregate Revenue Requirement for each year of the Control Period;</i></p> <p><i>iii. Revenue from retail sale of electricity at existing tariffs & charges and projected revenue gap for the first year of the Control Period;</i></p> <p><i>iv. Proposal of consumer category wise retail supply tariff and charges for first year of the Control Period:</i></p> <p>Provided that the Multi Year Tariff petitions for the Control Period commencing from 01.04.2024 shall be filed by generating entity, transmission licensee, distribution licensee and SLDC on or before 31.01.2024."</p> <p>Based on the above, it is clear that the instant petition lacks on 2 fronts:</p> <p>The Licensees have not filed the application for the True up of previous year (which is FY 2022-23) for Distribution and Retail Supply business (ref Regulation 6.2(b)(i) and 6.2(c)(i) respectively).</p> <p>The Petitioner has filed the instant Petition after a prolonged delay of ~10 months (July 2024 and September 2024 respectively for Distribution and RST business)) which in the opinion of the Objector is not appropriate. The reasoning put forth by the Licensees seems to be an afterthought to cover up for the substantial delay caused at the Licensee's end.</p> <p>On account of instant filings in non-compliance of the MYT Regulations 2023, the Petitioner's submissions merit non-consideration</p> | |
| 3 | <p>The Hon'ble Commission in the Order dated 07.06.2024 in the matter of Annual Performance Review of Distribution Business for FY 2022-23 has approved a Revenue Surplus of Rs. 1736.34 crore and Rs. 2227.42 Crore for TGSPDCL and TGNPDCL respectively. The relevant extracts from such Order is as under:</p> <p><i>"4.12 RECOVERY OF REVENUE GAP/(SURPLUS)</i></p> <p><i>4.12.1 As per Clause 10.5 of Regulation 04 of 2005 the Commission directs the Applicant to include and propose the adjustment mechanism of the total approved</i></p> | <p>Clause 4.12.1 of order dated 07.06.2024 on Annual Performance Review of Distribution Business states that the adjustment mechanism of the total approved revenue surplus is to be proposed in the end of control period review petition for 4th Control Period. The last petition for 4th</p> |

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| | <p>revenue surplus for TGSPDCL for Rs. 1736.34 crore (gap of Rs.20.54 crore for FY 2019-20, surplus of Rs. 253.05 crore for FY 2020-21, surplus of Rs. 1114.66 crore for FY 2021-22 and surplus of Rs. 389.17 Crore for FY 2022-23) and revenue surplus for TGNPDCL for Rs. 2227.42 Crore (surplus of Rs.384.76 Crore for FY 2019-20, surplus of Rs. 354.02, surplus of Rs. 634.03 Crore and surplus of Rs 854.62 Crore) in its end of control period review petition for 4th control period. This Order is corrected and signed on this the 7th day of June, 2024."</p> <p>It is mentioned that the impact of Revenue Gap pertaining to the True up of FY 2019-20 to FY 2022-23 has to be passed in the Retail supply business. The Hon'ble Commission is sincerely submitted to consider the impact of True up of Distribution business in the RST for FY 2024-25</p> | <p>Control period i.e., for FY 2023-24 is yet to be filed by TG Discoms wherein the adjustment mechanism would be provided as per directions given in the aforementioned order.</p> |
| 4 | <p>The petitioner (TGSPDCL) has claimed asset additions to the tune of Rs. 31,589 Crore for the Control period FY 2025-29 which is significantly high compared to the actual Capital Cost capitalized by the Distribution Licensees in the previous control period (FY 2019-24). Notably, such high level of projections for Capital cost is injurious to the financial health of the Distribution licensees as non-capitalization of the projected capital cost would effectively result into the revenue surplus which is against the principles of reasonable cost recovery</p> | <p>This issue is not pertains to TGNPDCL</p> |

**5వ నియంత్రణ కాలము యొక్క ఆర్థిక సంవత్సరాలకు (2024-25 నుండి 2028-29వరకు) రిటైల్ సప్లయ వ్యాపారము కోసము సమగ్ర ఆదాయ
ఆవశ్యకత మరియు 2024-25 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి, ధరల ప్రతిపాదనలు & క్రాస్ సబ్సిడీ సర్పార్ట్ ప్రతిపాదనలపై
ఎల్ . రమణ, MLC గారి సూచనలు/సలహాలకు సమాధానాలు**

| క్రమసంఖ్య | అభ్యంతరాలు /సూచనలు | TGNPDCL - సమాధానాలు |
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| 1. | <p>మా మనవి ఏమనగా. మేము సిరిసిల్ల పద్మశాలి కులమునకు చెందినవారు తెలంగాణాలో ఉన్న పద్మశాలీయులు 40% మంది ప్రజలు సిరిసిల్ల జిల్లాలో నివసించుచున్నారు. వారి కుల వృత్తి ఐన చేనేత పవర్ లూమ్స్ రంగం లో పని చేసుకుంటూ జీవనోపాధి పొందుచున్నారు. సిరిసిల్ల జిల్లాలో 25,494 పవర్ లూమ్స్, మిగతా తెలంగాణ అన్ని జిల్లాలో కలిసి 10,394 పవర్ లూమ్స్ కలవు. మా యొక్క జీవనోపాధి కడు పేదరికంలో నడుస్తుంది. సిరిసిల్ల పట్టణం లో 1999 నుండి ఇప్పటి వారికి 386 మంది చేనేత, పవర్ లూమ్ కార్మికులు ఆకలి చావులతో చనిపోయినారు. మరియు ఇతర జిల్లాలో సుమారు 30 మంది వారికి చేనేత పవర్ లూమ్ కార్మికులు చనిపోయినారు, ప్రస్తుతం విద్యుత్ ను 4వ కేటగిరి క్రింద 10 HP వరకు సబ్సిడీ వర్తింప జేస్తున్నది. కానీ ప్రస్తుతం చేనేత పవర్ లూమ్ కార్మికుల పరిస్థితి దయనియ స్థితి లో వున్నది కనుక వారి యొక్క జీవనోపాధి మెరుగు పరుచుట కొరకు ప్రభుత్వం ప్రయత్నం చేయగా , తెలిసినది ఏమనగా వారికి ప్రస్తుతం ఇస్తున్న సబ్సిడీ తో కూడిన 10 HP విద్యుత్ సరిపోవడం లేదు. కనుక సబ్సిడీ తో కూడిన</p> | <p>ప్రస్తుతం పవర్ లూమ్ కుటీర పరిశ్రమలకు 10HP వరకు విద్యుత్ ను వాడుకొనుటకు LT-IVA కుటీర పరిశ్రమల విభాగం క్రింద బిల్లు చేయడం జరుగుతున్నది మరియు ఈ LT-IVA విభాగం లో ఎనర్జీ చార్జీలు యూనిట్ కు ఒక్కటికి రూ. 4-00/- మరియు స్థిర చార్జీలు 1 kw కి రూ .20 నెలకి వసులు చేయటం జరుగుచున్నది. 2016-17 ఆర్థిక సంవత్సరం నుండి ఈ కుటీర పరిశ్రమలకు చార్జీలను పెంచలేదు మరియు LT-IVA కేటగిరి సబ్సిడీ కేటగిరి. ఆర్థిక సంవత్సరం 2024-25 డిస్కం లు సమర్పించిన టారిఫ్ ప్రతిపాదనలలో ఒక యూనిట్ సప్లై చేయడానికి అయ్యే సగటు వ్యయం రూ. 8.31/- కానీ Lt-IVA కుటీర పరిశ్రమలకు యూనిట్ ఒక్కంటికి ఎనర్జీ చార్జీలను రూ . 4/- మరియు స్థిర చార్జీలను రూ. 20 చొప్పున ఎలాంటి పెంపులేకుండా ప్రతిపాదించటం జరిగినది. పవర్ లూమ్స్ కుటీర పరిశ్రమలకి 10HP నుండి 20-25 HP వరకు పెంచటం అనే విషయం ప్రభుత్వ పరిధిలోని అంశం మరియు డిస్కం లు ఇప్పటికే నష్టాలలో కూరుకు పోయి విన్నవి కావున ఇంకా LT-IVA లోడ్ స్టాయి 10HP నుండి 20-25 HP పెంచడం వలన డిస్కం లు ఇంకా నష్టాలలో కూరుకుపోతాయి.</p> |

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| | <p>విద్యుత్ 4వ కేటగిరి క్రింద 20-25 HP ల వరకు ప్రభుత్వం ఇచ్చినచో , వారి యొక్క జీవనోపాధి మెరుగు పడే అవకాశం కలదు. ప్రస్తుతం ప్రభుత్వ పరిశీలనలో ఉన్నదీ. కనుక మీరు కూడా సువీసీడీ తో కూడిన విద్యుత్ 20-25 HP ల వరకు విద్యుత్ సబ్సిడీ అందించగలని మనవి.</p> | |
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5వ నియంత్రణ కాలము యొక్క ఆర్థిక సంవత్సరాలకు (2024-25 నుండి 2028-29వరకు) రిటైల్ సప్లయ వ్యాపారము కోసము సమగ్ర ఆదాయ ఆవశ్యకత మరియు 2024-25 ఆర్థిక సంవత్సరానికి రిటైల్ సప్లయ వ్యాపారానికి, ధరల ప్రతిపాదనలు & క్రాస్ సబ్సిడీ సర్పార్ట్ ప్రతిపాదనలపై బియ్యం కార్ శ్రీనివాస్, భారతీయ కిసాన్ సంఘ్, జిల్లా కార్యదర్శి, గ్రామము-సిరిసిల్ల, జిల్లా : రాజన్న సిరిసిల్ల గారి సూచనలు/సలహాలకు సమాదానాలు

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| 1. | సెస్సు లో మనగింగ్ డైరెక్టరు పోస్టును సహకార డిపార్టుమెంటు నుంచి వస్తున్నారు. కానీ ఇది అనగా సెస్సు సంస్థ టెక్నికల్ పై ఆధారపడి ఉన్నది. ఏ డిపార్టుమెంటు వారు అయితే డిపార్టుమెంటు వారికి పూర్తి అవగాహన ఉంటది. కావున వెంటనే NPDCL/SPDCL నుండి తీసుకుంటే అతనికి టెక్నికల్ గురించి అవగాహన ఉంటది. కాబట్టి బాగుంటది. వెంటనే చర్య తీసుకోగలరు. | లైసెన్స్ పరిధి లో లేని అంశం. |
| 2. | CESS వారు గృహ విద్యుత్ వినియోగదారులకు ప్రతి నెల జారీ చేయుచున్నటువంటి బిల్లులలో యావరేజ్ అనే పదము పెట్టి వినియోగదారులను ఆర్థిక ఇబ్బందులకు గురి చేయుచు 24 లేక 25 రోజులకు తీసిన రీడింగు 31 రోజులకు అని బిల్లులు ఎక్కువ చేయుచున్నారు. ఈ విషయము పై CGRF నిజామాబాదు నందు కేసు కూడా వేయగా వారు అన్ని విషయములను పరిశీలించి యావరేజ్ అనే పదము తీసివేయాలని తీర్పును వెలువరించారు . కావున ఇదివరకు ఎక్కువ వేసి వసూలు చేసిన కొన్నే లక్షల రూపాయలు వెంటనే వారి వారి విద్యుత్ వినియోగదారులకు వాపసు ఇవ్వవలసినదిగా | లైసెన్స్ పరిధి లో లేని అంశం. |

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| | <p>కోరనైనది.ఇందుగురించి యావరేజ్ అనే పదము ఏ రులు ప్రకారము ఉన్నది అనే CESS Office వారికి RTI Act ప్రకారముగా అడుగుతే పొంతన లేని సమాధానము ఇచ్చినారు . అయినా ఈ బిల్లులలో యావరేజ్ అనే పదము తీసివేయాలని సలహా.</p> | |
| 3. | <p>CESS లో అప్పటి అసిస్టెంట్ హెల్పర్ లలో ఒకరైన లింగము అనే అతని సర్టిఫికేటు దొంగ సర్టిఫికేటు అని అతనిపై చర్య తీసుకున్నారు. బాగానే ఉన్నది. కానీ అతనితో పాటు ఇంకా ఉన్న వారి పై ఏమి చర్య తీసుకున్నారో తెలుపగలరు. ఈ విషయము ప్రజలకు తెలుపవలసినదిగా కోరుచున్నాము.</p> | <p>లైసెన్స్ పరిధి లో లేని అంశం.</p> |
| 4. | <p>CESS లో కారుణ్య నియామకాలు అమలు చేయుచున్నారు సంతోషించతగిన విషయము. కానీ కారుణ్య నియామకాలపై ఉద్యోగమూ పొందిన వారిలో అటు తండ్రి ఇటు కొడుకులు పనిచేయుచున్నారు. ఇది ఏ విధముగా సమంజసము. దీనిపై ఎన్నో అనుమానాలకు తావు ఇస్తున్నది. అందుకు బహిరంగముగా విచారణ జరిపి శ్వేతపత్రము విడుదల చేయవలసినదిగా మనవి.</p> | <p>లైసెన్స్ పరిధి లో లేని అంశం.</p> |
| 5. | <p>రామ్ రెడ్డి అనే వ్యక్తి వేములవాడతను నలుబది వేల జీతము తో పనిచేయుచున్నట్లు తెలుస్తున్నది, ఇతను ఇదివరకే CESS ఉద్యోగిగా రిటైరు అయిన వ్యక్తి. అతను ఏ ఉద్యోగ నియమ నిబంధనల ప్రకారము చేయుచున్నాడు. ఆఫీసులో ఇంతమంది ఉన్నారు ఎవరికి లేని ఉద్యోగ అర్హతలు ఇతనికి ఉన్నవా తెలియాలి. ఇతను పది పదిహేను సంవత్సరముల నుండి చేయుచున్నాడు అంటే ఎంత పెద్ద మొత్తము ప్రజా ధనాన్ని CESS కోల్పోతుంది అంటే ఇది పాలక వర్గానికి</p> | <p>లైసెన్స్ పరిధి లో లేని అంశం.</p> |

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| | సంబంధము ఉన్నదని పొరులందరికీ అర్థమౌతుంది. ఈ విషయము ప్రజలకు తెలియవలసి ఉన్నది తెలుపగలరు. లేనిచో పలు అనుమానాలు కలుగుతవి. | |
| 6. | CESS AO Post ను కూడా Co-operative department వారే ఉందురు. ఇన్ని రోజులు ఖాళీ ఉంచకూడదు. తొందరగా భర్తీ చేయవలసినదిగా కోరసినది. | లైసెన్స్ పరిధి లో లేని అంశం. |
| 7. | సెస్సు వాళ్ళు నాణ్యత లేని మీటర్లు తేవడము వలన అధిక బిల్లులు వచ్చి వినియోగదారులు ఇబ్బందులకు గురి అవుతున్నారు . ఇందు గురించి నా సలహా ఏమిటంటే నష్టానికి వారు వాడినటువంటి ఐస్ స్టాండర్డ్ మీటర్లనే ఇచ్చట కూడా ఉపయోగించాలని నా సలహా. | లైసెన్స్ పరిధి లో లేని అంశం. |
| 8. | పైన చెప్పినటువంటి అవకతవకలు నిర్మూలించాలంటే తక్షణమే ఈ CESS ను NPDCL / SPDCL లో విలీనము చేయవలసిన అవసరము ఉన్నది . | లైసెన్స్ పరిధి లో లేని అంశం. |