

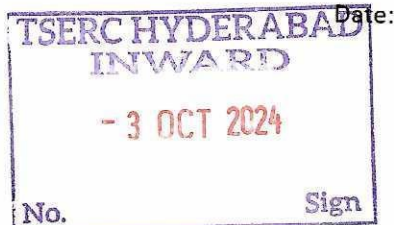


TELANGANA SOLAR OPEN ACCESS DEVELOPERS ASSOCIATION

Regn.No.1191 OF 2016

To,

The Secretary,
TSERC, 5th Floor, 11-4-660, Singareni Bhavan,
Red Hills, Hyderabad - 500 004



Dear Sir,

Sub: - Comments and suggestions on the filings made by TGDISCOMs in respect of Aggregate Revenue Requirement (ARR) for Retail Supply Business for 5th Control Period i.e., from FY 2024-25 to FY 2028-29 & Tariff Proposals for FY 2024-25 – Objections submitted- Reg.

(1) Need for separate category for startup power of renewable generating sources: -

It is humbly submitted that several states have incorporated a separate category for RE startup power.

The relevant extracts from APERC are re-produced for the quick reference of this Honorable commission.

CATEGORY-II (B): STARTUP POWER – HT

Applicability

The tariff is applicable for supply of electricity to startup power for Captive Generating Plants or Co-Generation Plants or Renewable Energy Generation Plants and Merchant plants.

The Startup Power is intended for those generators who require occasional and intermittent supply for startup operations of the generating unit(s) alone. However, the Captive and Cogeneration plants with their process plants being located in the same premises and have single connection with the grid (APTransco / DISCOMs) and who continuously depend on the licensees' supply for part of their energy requirement may be given option to either continue in their present category or to be included in this new category. Without giving an opportunity to all such generators to exercise option in this regard, the category change shall not be affected.

The conditions applicable for Startup Power are as follows:

- I. *Supply is to be used strictly for generator start-up, operations, maintenance and lighting purposes only.*
- II. *Allowable Maximum Demand shall be limited to the percentage (as given below) of the maximum capacity unit in the generating station in case of generators other than Wind and Solar, and of the plant capacity in case of Wind and Solar generator.
Thermal -15%, Gas based – 6%, Hydel – 3%, NCE Sources – 10%, Wind and Solar – 2%*
- III. *If the Maximum Demand exceeds the limits specified above, the energy charges shall be charged at 1.2 times of normal charge for the entire energy consumed.*
- IV. *iv. All other conditions applicable to Category II: Commercial & Others– HT shall also apply to the Category II(B): Startup Power–HT to the extent they are not contradictory to the above.*

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- V. This category is also applicable to all the Wind and solar plants who have PPAs with the licensees.

Voltage of Supply	Demand Charges (Rs./kVA/month)	Energy Charges (Rs./kVAh)
All Voltages	Nil	12.25

Note: In respect of cogeneration Sugar plants, the billing shall be in accordance with the specific clauses of the power purchase agreements.

Therefore, it is requested that the Honorable Commission to notify separate category for solar RE generators without any fixed charges in line with above provisions.

(2) Grid Support Charges (GSC): -

8.1 Background

The licensee in the tariff filings for FY 2023-24 have proposed to levy Grid Support Charges on the Captive consumers in their area, for the benefits they are availing during their parallel operation with the licensees' grid network.

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

However, the Licensee has expanded the scope/applicability of levy of such GSC on Captive Power Plants (both Renewable and Conventional) both co-located and not co-located, IPPs (both Renewable and Conventional) & Solar Roof Top plants and Generators having partial PPAs with the Licensee over and above PP capacity, basically covering universe of power plants. Even the calculation captures Contracted Capacity also as 18,999 in MW.

DISCOMs proposal has misguided honorable commission and therefore the levy of GSC should be restricted to only co-located captive power plants, which work in parallel with the grid.

- (3) **The standby charges:** Not applicable in TG state as the TG DISOMs are allowing Green Energy Open Access within consumer CMD. It is the duty of DISCOMs to provide electricity on demand when the fixed charges for the respective CMD is paid by the consumer. There is no question of payment of stand-by arrangement as the consumer is already paying fixed charges for the CMD. The question of standby charges arises only when DISCOMs are giving OA beyond CMD of the consumer.

Therefore, the standby charges proposal has to be rejected in toto.

For Telangana State Solar Developers Association,

Authorized Signatory.