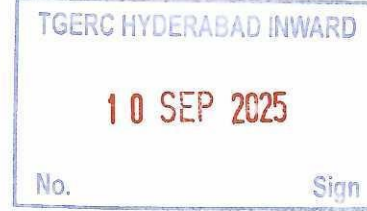


ITC Limited
Paperboards & Specialty Papers Division
6th Floor, Sattva Signature Tower,
#8-2-472/1/A/B/6F, Road No. 1, Banjara Hills,
Hyderabad 500034, Telangana, India
Telephone : 91-40-27846566, 68-73



To,
The Secretary,
Telangana State Regulatory Commission,
Vidyut Niyantran Bhavan,
Sy. No.145-P, G.T.S. Colony, Kalyan Nagar,
Hyderabad – 500 045.

Date: 04/09/2025.

Dear Sir,

Sub.: Sub. : Submission of objections and suggestions against the resubmissions made in OP No.21 of 2025 filed by M/s TGSPDCL vide its Lr.No.CE(IPC&RAC)/SE(RAC)/ADE(RAC)-III/F.No.A-116/D.No.283/25, Dt.01-08-2025/05-08-2025 and OP No.22 of 2025 filed by M/s TGNPDCL vide its Lr.No.CE/I&R/GM/I&R/DE(RAC)/TGNPDCL/WGL/F.03/D.No.146/25-26,Dt:06.08.2025, proposing certain amendments u/s 62.4 of Electricity Act,2003 to ToD Tariffs approved in the Tariff Order of FY 2025-26 - Reg.

The Company made its objections and suggestions against the proposal of the DISCOMs to the Hon'ble Commission requesting changes in ToD tariffs. The copy of the same is attached for ready reference pl.

Thanking You,
For ITC Limited - Paperboards & Specialty Papers Division.

(Lakshmi Kumar V)
Senior Manager - Energy.

Encl.: Above cited objections & Suggestions submitted to Ms/ TGNPDCL & TGSPDCL.



ITC Limited
Paperboards & Specialty Papers Division
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Telephone : 91-40-27846566, 68-73

To,

The Chief Engineer(IPC&RAC),
TGNPDCL / Warangal,
H.No.2-5-31/2, Vidyuth Bhavan, Nakkalagutta,
Hanumakonda - 506001.

The Chief Engineer(IPC&RAC),
TGSPDCL / Corporate office, 1st floor,
'A' block, Mint Compound. Hyderabad – 500063.

Date: 03/09/2025

Sub. : Submission of objections and suggestions against the resubmissions made in OP No.21 of 2025 filed by M/s TGSPDCL vide its Lr.No.CE(IPC&RAC)/SE(RAC)/ADE(RAC)-III/F.No.A-116/D.No.283/25, Dt.01-08-2025/05-08-2025 and OP No.22 of 2025 filed by M/s TGNPDCL vide its Lr.No.CE/I&R/GM/I&R/DE(RAC)/TGNPDCL/WGL/F.03/D.No.146/25-26,Dt:06.08.2025, proposing certain amendments u/s 62.4 of Electricity Act,2003 to ToD Tariffs approved in the Tariff Order of FY 2025-26.

ITC Limited ("ITC"), the **Objector** herein, is a company under the Companies Act 2013 with its registered office at Virginia House, 37 J.L. Nehru Road, Kolkata 700071 and its paper and paperboard manufacturing unit at Sarapaka Village, Bhadradi Kothagudem District, Telangana. The objector is also having another conversion unit at Miyapur, Bollaram in Telangana.

- 1) The DISCOMs have mentioned in the resubmissions dated 1st & 5th Aug,2025 and 6th Aug,2025 against their petitions 21 & 22 of 2025 that,
 - a. the power purchase during 10:00 Hrs to 18:00 Hrs from costlier sources like thermal and market purchases.

The company's objections and suggestions:

The DISCOMs supposed to enter into PPA's for their entire annual energy requirements as approved by the Hon'ble Commission in the tariff order for FY 2025-26. So, the DISCOMs may be procuring only shortfall energy requirements and not the entire energy requirement from the open market/exchange.

Therefore, the DISCOMs claim is partially correct for the period April to July months. Whereas, the rates in August to March months are costlier around 2 to 3 hours (i.e., around 22:00 hrs to 00:00 hrs) in a day and the rates during the remaining 5 to 6 hours in a day (i.e., around 00:00 hrs / 01:00 hrs to 06:00 hrs) are much cheaper. So, such procurements should compensate more than the cost incurred during the costly hours.

We would like to bring to your kind notice that, the open market/exchange (ACP) rates are much lower (around 2-4 Rs./unit) during solar hours, i.e. between 08:00 hrs to 17:00 hrs in all days in FY2024-25. The month wise trend of ACP rates for entire FY2024-25 is attached as Annex-A for your ready reference.

In fact, we will appreciate the DISCOMs to consider to file the following:

1. Revision of morning peak ToD hours to 06:00 Hrs to 08:00 Hrs instead of 06:00 Hrs to 10:00 Hrs due to availability of cheaper power from 08:00 Hrs in solar time.
 2. To reduce the normal Tariff by at least ₹1.00 in all categories since cheaper power is available in the solar hours.
- b. The market purchase prices during the period 22:00 Hrs to 06:00 Hrs are on the higher side, whereas the licensee(s) are providing supply to certain HT categories at lower rates due to ToD Tariff.

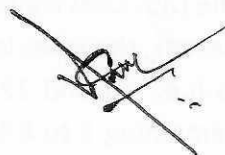
The company's objections and suggestions:

The DISCOMs have not provided any data substantiating their above claim to submit the Company's objections and suggestions.

- c. Due to the implementation of ToD tariffs aforementioned, the licensee(s) revenues are getting affected adversely, while the cost of power purchase is on higher side.

The company's objections and suggestions:

The DISCOMs are supposed to procure RTC power under PPA's to meet their annual energy requirements. Even, if the energy being procured from the open market/exchange, the quantum may be nominal. Hence, it will not have any adverse impact the DISCOMs revenue. In fact, it will have positive impact on revenue instead otherwise.



- d. Submitted hourly power purchase cost in Rs./unit for FY2024-25.

The company's objections and suggestions:

Noted, but no relevance to the claim since the majority of the energy being procured under RTC power through PPAs.

- e. Submitted category wise ToD sales in MU for FY2024-25.

The company's objections and suggestions:

Noted. However, the DISCOMs are well aware of this data before filing the ARR for FY 2025-26. So, it should have already considered while filing the ARR for FY2025-26.

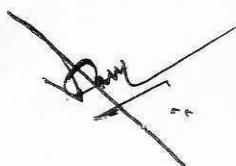
- f. In view of the above, the licensee(s) are requesting the Hon'ble Commission to consider the proposal to remove the incentives allowed during the off-peak hours (10:00 PM to 06:00 AM) for the remaining part of FY 2025-26.

The company's objections and suggestions:

The company's objections and suggestions under Sl. No. a to e above are self-explanatory. Therefore, it is requested to withdraw the proposal and may file other submissions to review at least the ToD hours.

Suggestion for revised ToD Hours.

1. Off-Peak ToD Hours 00:00 Hrs to 06:00 Hrs
2. Peak ToD Hours 06:00 Hrs to 08:00 Hrs
3. Off-Peak ToD Hours 08:00 Hrs to 17:00 Hrs
4. Peak ToD Hours 18:00 Hrs to 22:00 Hrs
5. Normal Hours 22:00 Hrs to 00:00 Hrs



- 2) The Hon'ble Commission has already approved energy requirement of **65,521 MU & 25,450 MU** to TGSPDCL and TGNPDCL respectively in the Tariff order for FY2025-26 as against their ARR filings.

The company's objections and suggestions:

As per the above approval by the Hon'ble Commission, both the DISCOMs should have entered into power purchase agreements under long-term, medium-term and short-term for supply of RTC power to meet their energy requirement for entire FY2025-26.

In view of above PPAs, the hourly rate fluctuations should not impact the revenue of the DISCOMs. Unless, there is an abnormal increase in consumption during the off-peak hours (22:00 Hrs to 06:00 Hrs) Vs the consumption in FY2024-25 during the same off-peak hours.

Therefore, it is requested to withdraw the proposals for amendment to the ToD Tariffs. Unless, the DISCOMs demonstrate the growth in the energy requirement in MU Vs the approved energy requirement in MU under tariff order for FY 2025-26.

The Hon'ble Commission has directed the DISCOMs to procure energy from the open market/exchange on need basis in the Tariff order for FY2025-26. So, need for such procurement in the open market/exchange to be justified. If, the DISCOMs are already procuring.

The Hon'ble Commission has also directed the DISCOMs under clause 3.18.12 of the Tariff order of FY2025-26, to submit a detailed report in their subsequent filings, outlining potential improvements in ToD tariff structures based on real-time consumption patterns for evaluating the findings and take decision in future tariff orders to ensure that ToD tariffs serve its intended purpose of efficient load management and grid stability.

Therefore, as per the above directions of the Hon'ble Commission, the DISCOMs are requested to file their findings in the next ARR filings for FY2026-27.



Name and full address of the objector along with email id and contact number	Brief details of Objection(s) /Suggestion(s) on proposals of TGNPDCL	Whether copy of Objection(s)/Suggestion(s) & proof of delivery at Licensee's office enclosed (Yes/No)	Whether Objector wants to be heard in person (Yes/No)
<p>Name - Lakshmi Kumar Velpuri, on behalf of ITC PSPD Limited,</p> <p>Company Address – 6th Floor, Sattva Signature Tower, Road No-1, Banjara Hills, Hyderabad-500034.</p> <p>Email ID -LakshmiKumar.Velpuri@itc.in Contact Number -9000080461</p>	Attached	Yes	Yes

Name and full address of the objector along with email id and contact number	Brief details of Objection(s)/Suggestion(s) on proposals of TGSPDCL	Whether copy of Objection(s)/Suggestion(s) & proof of delivery at Licensee's office enclosed (Yes/No)	Whether Objector wants to be heard in person (Yes/No)
<p>Name - Lakshmi Kumar Velpuri, on behalf of ITC PSPD Limited,</p> <p>Company Address – 6th Floor, Sattva Signature Tower, Road No-1, Banjara Hills, Hyderabad-500034.</p> <p>Email ID -LakshmiKumar.Velpuri@itc.in Contact Number -9000080461</p>	Attached	Yes	Yes



The month wise trends for ACP / market power purchase cost for FY2024-25 is given below:

