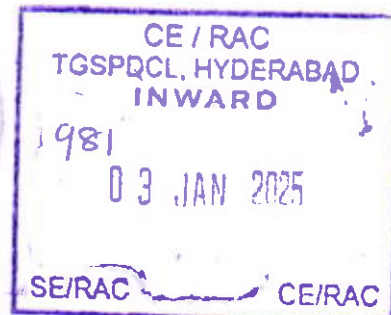


TELANGANA SOLAR OPEN ACCESS DEVELOPERS ASSOCIATION

Regn.No.1191 OF 2016

To,
The Secretary/TGERC,
Vidyut Niyamtran Bhavan, Sy.No.145-P,
G.T.S. Colony, Kalyan Nagar, Hyderabad 500 045

Date: 02-01-2025



Dear Sir,

Sub:- Submission of comments, **objections** and suggestions on the proposals of TGSPDCL in the matter of determination of **Additional Surcharge (AS)** to be levied for the **(H1)** of **FY 2025-26**— Reg.

Ref:-

- (1) O. P. No. 23 of 2020 Dated 18.09.2020.
 - (2) Electricity (Promoting Renewable Energy Through Green Energy Open Access) Rules, 2022, Dated: 06.06.2022
 - (3) Telangana Solar Open Access Developers Association Submission of comments in respect of all previous ASS proposals of TGSPDCL
 - (4) Order in Additional Surcharge (AS) to be levied for the (H1) of FY 2024-25 Dated: 15.03.2024 (O.P.No.39 of 2023 for H1 of FY 2024-25 for TGSPDCL & O.P.No.40 of 2023 for H1 of FY 2024-25 for TGNPDCL)
 - (5) Order in Additional Surcharge (AS) to be levied for the (H2) of FY 2024-25 Dated: 30.09.2024 (O.P.No.7 of 2024 for H2 of FY 2024-25 for TGSPDCL & O.P.No.8 of 2024 for H2 of FY 2024-25 for TGNPDCL)
- r. No.CE(RAC)/SE(RAC)/DE(RAC)/F.A.115/D.No. 617 /24, Dt:28-11-2024.

Vide (2) Cited above, Electricity Rules'2022 dated:06.06.2022 were framed that exempts Solar Green Projects from levy of Additional Surcharge. These rules come into effect from the date of their publication in the Official Gazette, i.e., 6th June 2022.

Vide (3) Cited above, our association had represented to the honorable commission during proceedings of each Additional surcharge proposal of TGSPDCL.



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Vide (4&5) Cited above, our submissions were acknowledged positively by the Hon'ble commission only in the AS orders of H1 & H2 of FY24-25.

Exact relevant clause of the order is reproduced below: -

"The Additional Surcharge shall not be applicable for Green Energy Open Access (GEOA) consumer, if fixed charges/demand charges are being paid by such a consumer. "

Despite the clear directive issued by this Honourable Commission regarding the exemption of Additional Surcharge (AS) for GEOA consumers, the offices of TGSPDCL continue to impose AS on GEOA consumers in violation of the regulations set forth by this Honorable Commission.

Upon approaching the offices of TGSPDCL, our association members were informed of a new requirement to register the solar project and scheduled consumer on the GOAR portal in order to qualify for AS exemption as GEOA consumers. It is important to note that registration on the GOAR Portal was not a prerequisite as per the orders issued by this Honorable Commission for extending AS exemption to GEOA consumers. Furthermore, the offices of TGSPDCL have failed to approve the files of solar generators and scheduled green consumers seeking to register on the GOAR portal for a period exceeding 3-4 months.

The actions of TGSPDCL constitute a deliberate disregard for the orders of this Honourable Commission. Therefore, we respectfully request that this Honourable Commission take appropriate action and issue any necessary orders in response to the aforementioned conduct of the TGSPDCL offices.

For Telangana State Solar Developers Association,

Authorized Signatory.

Copy Communicated to:-

- 1) The Chairman/TGERC,
- 2) The CGM (RAC)/TGSPDCL/Hyderabad
- 3) The CGM(IPC&RAC/TGNPDCL)/Warangal

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TSOADA

TELANGANA SOLAR OPEN ACCESS DEVELOPERS ASSOCIATION

Regn.No.1191 OF 2016

To,
The Chief General Manager/Revenue,
TGSPDCL, Mint Compound,
Hyderabad.



Date: 02-01-2025

Dear Sir,

Sub:-Levy of Additional surcharge (AS) on Green Energy Open Access Consumers (GEOA) against the Hon'ble TGERC orders – Reg.

Ref:-

- (1) Order in Additional Surcharge (AS) to be levied for the (H1) of FY 2024-25 Dated: 15.03.2024 (O.P.No.39 of 2023 for H1 of FY 2024-25 for TGSPDCL & O.P.No.40 of 2023 for H1 of FY 2024-25 for TGNPDCL)
- (2) Order in Additional Surcharge (AS) to be levied for the (H2) of FY 2024-25 Dated: 30.09.2024 (O.P.No.7 of 2024 for H2 of FY 2024-25 for TGSPDCL & O.P.No.8 of 2024 for H2 of FY 2024-25 for TGNPDCL)

It is to submit that AS is exempted for GEOA consumers as per the TGERC AS orders for H1 & H2 of FY24-25 cited vide (1&2) above. Exact relevant clause of the order is reproduced below: -

"The Additional Surcharge shall not be applicable for Green Energy Open Access (GEOA) consumer, if fixed charges/demand charges are being paid by such a consumer. "

Despite the clear directive issued by the Hon'ble TGERC regarding the non-applicability of Additional Surcharge (AS) for GEOA consumers, your offices are continuing to impose AS on GEOA consumers. Your offices have orally informed our association members that such levied AS will be refunded after GOAR registration. It is also pertinent to mention that registration on the GOAR Portal was not a prerequisite condition as per the orders issued by Hon'ble TGERC.

Therefore, levy of AS on GEOA consumers constitutes disregard for the orders of Hon'ble Commission and we respectfully request your good office to comply with the orders of Hon'ble commission duly exempting of AS on GEOA consumers.

For Telangana State Solar Developers Association,

Authorized Signatory.

Copy Communicated to:-

- 1) The Chairman/TGERC,
- 2) The CGM (RAC)/TGSPDCL/Hyderabad,
- 3) The CGM(IPC)/TGSPDCL/Hyderabad