

Jeevaka Industries Pvt. Ltd.

(STEEL PLANT DIVISION)

Adm. Office : 11-6-27/17, 1st Floor, Opp. IDPL Factory, Balanagar,
Hyderabad - 500 037 (T.S.) Tel : +91-40-23771692

Factory : Village Chegunta, Mandal Chegunta, Dist. Medak - 502255, (T.S.)
Tel : 08452-225045 Fax : 08452-225046



Date:18-01-2025

To,

The Secretary,

TGERC,

Vidyut Niyamtran Bhavan, Sy.No.145-P,

G.T.S. Colony, Kalyan Nagar, Hyderabad 500 045.

Subject: Suggestions on the filings made by TGSPDCL and TGNPDCL in the matter of determination of Additional Surcharge to be levied on Open Access consumers for first half (H1) of FY 2025-26.

Dear sir,

We are here with filing our objections for levy of additional surcharge for open access consumers for first half (H1) of FY 2025-26. We request you to kindly take on record and condone for delay in filing of our objections. we also request you to kindly provide us an opportunity to present our case before Honourable Commission during the scheduled public hearing on Dt.20.01.2025.

Yours Faithfully

For Jeevaka Industries Pvt Ltd.

Anil Agarwal



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Suggestions on the Petition filed by TSSPDCL for claiming Additional Surcharge H1 2025-26

The suggestions are broadly on the following aspects:

- A) Cross subsidization of Additional Surcharge on open access consumers
- B) Intra state transmission charges claimed are more than the transmission ARR recovery approved by the Telangana Commission for FY 2025-26

Detailed comments

1. Cross subsidization of Additional Surcharge on Open Access Consumers

1.1. The Hon'ble Commission in the previous Order for determination of Additional Surcharge for H2 FY 2024-25 dated 30.09.2024 has specified Terms & Conditions for levy of Additional Surcharge, wherein the Telangana Commission has directed the distribution licensee that additional surcharge not to be applicable on captive consumers and green energy open access consumers. The relevant section of the aforementioned order is extracted as under:

"4.11.3 Terms & Conditions for levy of Additional Surcharge:

.....

iii. The Additional Surcharge shall not be applicable on such open access consumers to the extent of open access availed for wheeling of power from their own Captive Power Plants (CPPs).



Regd. Office : 15-9-360, Mahaboobgunj, Hyderabad - 500 012.

GSTIN : 36AAACJ5113G1ZY CIN : U27100TG1996PTC023288

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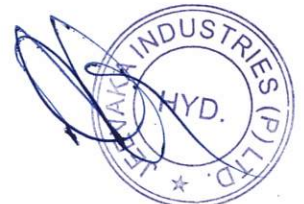
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iv. The Additional Surcharge shall not be applicable of Green Energy Open Access (GEOA) consumer, if fixed charges/demand charges are being paid by such a consumer."

- 1.2. However, the Telangana Distribution Licensees has, for the computation of stranded power considered the quantum associated with the captive consumption and the consumption of green power through bilateral mechanism in the open access schedule. Further, the above mentioned quantum is not considered in 'open access sales' while computing the per unit additional surcharge leading to a higher charge recovery from other open access consumers.
- 1.3. The distribution licensee in the present petition while determining the additional surcharge has partially followed the directives of the Hon'ble Commission specified in the previous additional surcharge order dated 30.09.2024, leading to high stranded power, which in turn will lead to levy of high additional surcharge and cross subsidization of additional surcharge by the conventional open access consumers for the captive and green energy open access consumers.
- 1.4. Distribution licensee in order to fully comply with the direction of the previous additional surcharge order stated above must not consider the quantum associated with captive consumption and green energy open access consumers while computing the stranded power and open access sales.
- 1.5. Owing to above incorrect consideration of quantum associated with the captive consumption and the consumption of green power through bilateral mechanism, we submit our objection on the matter as mentioned above for the kind reference of the Hon'ble Commission. Revised computation of additional surcharge for H2 FY 2025-26 is annexed.



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2. Intra State Transmission Charges claimed are more than the Transmission ARR recovery approved by the Hon'ble Commission for FY 2025-26

- 2.1. The Telangana Distribution Licensees, for the computation of per unit transmission charges, considered the actual intra-state transmission charges. The said claims are based on the past Additional Surcharge Orders of the Hon'ble Commission, wherein the Hon'ble Commission has also considered the actual intra-state transmission charges while working out the ASC for corresponding periods.
- 2.2. The transmission charges for FY 2024-25 considered in the present petition will be trued up in future and may be lower than the cost considered in the present petition. Further, it seems owing to similar reason the Telangana Discoms while computing the distribution cost has considered the approved transmission cost as per the recent ARR Order and which is in line with the existing methodology for determination of additional surcharge approved by the Hon'ble Commission.
- 2.3. It is in view of the above inclusion of actual transmission charges for computation of Additional Surcharge as claimed by the Petitioner, will lead additional recovery of transmission charge on the open access consumers.
- 2.4. Thus, we request the Hon'ble Commission to re-consider its view on allowing inclusion of actual transmission charges in the ASC and rather consider the approved transmission charge for either based on last true up order or last ARR order.

Computation of Additional Surcharge based on the above submission is annexed along for the kind reference of the Hon'ble Commission.



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Annexure - 1

**Average Stranded Capacity due to Open Access (Not considering quantum due to captive consumers and green energy open access consumers)-
Reference sheet "Additional Surcharge model_H1 FY26 - V1" submitted by
TS Discoms**

Particular (in MW)	Apr-2024	May-2024	Jun-2024	Jul-2024	Aug-2024	Sep-2024	Average
Available capacity	27185938.63	29038654.09	25857557.20	23264168.99	29210635.94	30246117.09	9380.87
Scheduled Capacity	22758730.91	23432384.67	21243041.93	19347921.08	23347232.66	23856340.94	7626.69
Gross(Deficit)/Surplus Short-Term Purchases Capacity	4445308.52	5634500.36	4625256.92	3978279.11	5880363.14	6396651.01	1762.32
(Deficit)/Surplus after netting of Short-Term Purchases	5897312.60	2346820.80	4555479.12	9340628.98	10491325.43	5178805.17	2152.23
OA Scheduled Capacity	1516376.21	4111845.40	1834617.42	125340.74	429674.96	2898431.30	621.37
Stranded Capacity	130823.23	161487.87	121366.64	162132.99	159489.34	161756.36	51.06
	92179.70	155663.13	89563.81	29038.49	47648.94	115853.98	30.17

Transmission Charge for H1 FY 2025-26 - Reference sheet "Additional Surcharge model_H1 FY26 - V1" submitted by TS Discoms

Transmission Charges	FC paid from Apr'24 to Sep'24	Remarks
PGCIL	1047.41	No change
Transco	1711.03	Half (1/2) of the Transmission cost as per Aggregate Revenue Requirement & Transmission Tariffs for 5 th Control Period dt 28.10.2024.
SLDC	23.25	No change
PGCIL & T/m Cost	2781.69	No change

**Additional Surcharge for H1 FY 2025-26 (based on above submission) -
Reference sheet "Additional Surcharge model_H1 FY26 - V1" submitted by
TS Discoms**

Additional Surcharge	Unit	TG Discom Filings for FY25-26 H1	Submission of Objector for FY25-26 H1
{A} Long term available capacity	MW	9380.87	9380.87
{B} Capacity stranded due to open access	MW	54.83	30.17



Additional Surcharge		Unit	TG Discom Filings for FY25-26 H1	Submission of Objector for FY25-26 H1
{C}	Fixed Charges paid	Rs. crore	6042.34	6042.34
$\{D\}=\{C\}\div\{A\}$	Fixed Charges per MW	Rs. crore/MW	0.64	0.64
$\{E\}=\{D\}\times\{B\}$	Fixed Charges for stranded capacity	Rs. crore	35.32	19.43
{F}	Transmission charges paid	Rs. crore	2968.94	2781.69
{G}	Actual Energy scheduled	MU	41784.38	41784.38
$\{H\}=\{F\}\div\{G\}$	Transmission charges per unit	Rs./kWh	0.71	0.67
I	Distribution charges as per Tariff Order	Rs./kWh	0.19	0.19
$\{J\}=\{H\}+\{I\}$	Total transmission and distribution charges per unit	Rs./kWh	0.90	0.86
{K}	Energy consumed by open access consumers from the DISCOMs	MU	1196.31	1196.31
$\{L\}=\{K\}\times\{J\}$	Transmission and distribution charges to payable by open access consumers	Rs. crore	107.90	102.54
{M}	Demand charges recovered by the DISCOM from open access consumers	Rs. crore	112.55	112.55
$\{N\}=\{M\}-\{L\}$	Demand charges to be adjusted	Rs. crore	4.65	10.01
$\{O\}=\{E\}-\{N\}$	Net stranded charges recoverable	Rs. crore	30.67	9.42
{P}	Open access sales	MU	181.80	181.80
$\{Q\}=\{O\}\div\{P\}$	Additional Surcharge computed	Rs./kWh	1.69	0.52

