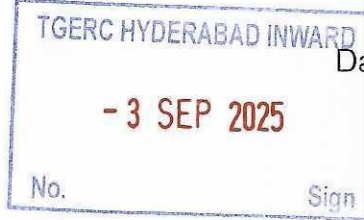


# MRF

MRF Limited, P.B. No. 2, Sadasivapet - 502 291, Sangareddy District, Telangana  
STD : 08455 Tel : 247400 / 94910 68270, 94910 68271 Fax : 252614  
CIN : L25111TN1960PLC004306

To  
The Chief Engineer (IPC & RAC),  
TGSPDCL, Corporate Office,  
1st Floor, 'A' Block, Mint Compound,  
Hyderabad - 500063.



Date: 03-09-2025.

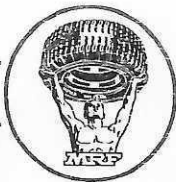
**Subject:** Objection to TGSPDCL's Proposal to Withdraw Night-Time Rebate under HT-I ToD Tariff for FY 2025-26 (Filings in O.P. Nos. 21 & 22 of 2025).

Respected Sir/Madam,

We, MRF Limited, bearing HT Service Connection No. SGR488, operate our manufacturing unit at Sadashivpet, Telangana, and are consumers under the HT-I (132 kV) category of the Telangana State Southern Power Distribution Company Limited (TGSPDCL).

We hereby submit our formal objections to the proposal submitted by TGSPDCL before the Hon'ble Commission seeking withdrawal of the ₹1.50/unit night-time rebate applicable during the 10:00 PM to 6:00 AM slot under the current Time-of-Day (ToD) tariff for FY 2025-26.

Details	Information
Name & Full Address of Objector	MRF Limited, Sadashivpet, Telangana
Email ID	nawazreddy.b@mrfmail.com
Contact Number	9849325462
Brief Details of Objection / Suggestion	Objection to withdrawal of ₹1.50/unit night-time rebate under HT-I ToD tariff for FY 2025-26 by TGSPDCL. This rebate is crucial for DSM objectives, tariff stability, and business viability. Sudden withdrawal causes financial and operational disruptions.
Copy of Objection / Suggestion & Proof of Delivery at Licensee's Office Enclosed	Yes/ No
Whether Objector Wants to be Heard in Person	Yes / No



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## Grounds for Objection

### **1. Purpose of ToD Tariff and DSM Objectives**

The Time-of-Day tariff was introduced as a Demand Side Management (DSM) tool to encourage consumers to shift their power usage to off-peak hours, thereby promoting grid stability and reducing peak demand. This objective has been successful, as many industries, including ours, have adjusted operations to night shifts in response to the rebate.

The proposed withdrawal directly undermines these DSM objectives and may result in consumers reverting to daytime operations, thereby increasing the load during peak hours and defeating the purpose of the ToD structure.

### **2. Legitimate Expectation and Consumer Investment**

The current tariff order for FY 2025–26 clearly provides for a ₹1.50/unit rebate during the 10:00 PM to 6:00 AM period. Based on this approved structure, industries like ours have:

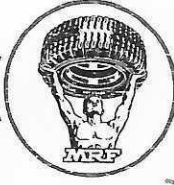
- Scheduled operations around night shifts
- Invested in relevant systems, equipment, and staffing
- Planned our annual budgets based on the existing tariff

Withdrawing the rebate mid-year is unfair and disruptive. Consumers have a legitimate expectation that the tariff, once approved, will remain in force for the full control period. Sudden or unexpected changes to an already-notified tariff negatively impact businesses like ours that have made operational and financial decisions in good faith with the legitimate expectation of tariff stability at least during the control period.

### **3. Tariff Stability and Non-Retroactivity**

Tariff orders, once notified, act as a binding agreement between the utility and the consumer for the duration of the control period. TGSPDCL's proposal constitutes an unjustified mid-year revision and violates two key regulatory principles:

- Tariff Stability: Ensures predictability for consumers
- Non-Retroactivity: Consumers should not be penalized for consumption decisions already made based on existing tariffs



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#### 4. Financial Impact on MRF Limited

The proposed withdrawal would result in an increased energy cost of ₹1.50/unit during night-time operations. Based on our current consumption pattern, this would impose an additional monthly financial burden of ₹1.07 crore, severely impacting our cost structure and operational viability.

#### 5. Regulatory Precedents

We respectfully draw attention to similar cases before the Maharashtra Electricity Regulatory Commission (MERC), where attempts to revise or remove night-time rebates were rejected on sound regulatory grounds:

- Order dated 28.03.2025 (MSEDCL ARR Petition)
- Case No. 116 of 2008 (Order dated 17.08.2009)
- Case No. 121 of 2014 (Order dated 26.06.2015)
- Case No. 322 of 2019 (Order dated 30.03.2020)

In each case, MERC ruled that such changes lacked proper justification and were inconsistent with DSM objectives and consumer interest.

#### Prayer to TGSPDCL and the Hon'ble Commission

In light of the above, we respectfully request that the Hon'ble Commission:

1. Reject TGSPDCL's proposal to withdraw the ₹1.50/unit night-time rebate for HT-I consumers for FY 2025-26
2. Retain the current ToD tariff structure for the remainder of the control period without changes
3. Instruct TGSPDCL to conduct a comprehensive impact assessment and meaningful stakeholder consultation before proposing any future changes to the ToD tariff

We trust the Commission will act in the interest of fairness, regulatory consistency, and grid stability.

We also confirm our intent to participate in the public hearing scheduled on 19.09.2025.

Regards

**Shibu Sam**  
General Manager

Cc to: The Secretary/TGERC/ Vidyut Niyantran Bhavan, Kalyan Nagar, Hyd-500 045.

Registered Office : No. 114, Greams Road, Chennai - 600 006.

Website: [www.mrftyres.com](http://www.mrftyres.com)