



Ramagundam Fertilizers And Chemicals Limited

रामागुंडम फर्टिलाइजर्स एण्ड केमिकल्स लिमिटेड

(A Joint Venture Company)

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GSTIN : 36AAHCR2335P1ZY, CIN : U24100DL2015PLC276753

Letter No: RFCL/Elect/TGERC/TGNPDCL/TOD Revision Objection

Date: 04.09.2025

To
The Chief Engineer IPC & RAC
TG NPDCL HO
Warangal

Sub: Submission of objections and suggestions in IA No.24 in OP No.21 of 2025 filed by TGSPDCL and IA No.25 in OP No.22 of 2025 filed by TGNPDCL, seeking certain amendments to ToD Tariffs approved in Tariff Order of FY 2025-26 in O.P.Nos 21 & 22 of 2025

Ref: TGERC I.A. No. 25 in O.P. No. 22 of 2025

Respected Sir,

With reference to the public notices dated 14.8.2025, we are submitting the following points on the subject proposals for the consideration of the Hon'ble Commission:

1. TGNPDCL have sought a mid-term review on ToD charges earlier proposed by them and approved by the Hon'ble Commission in the retail supply tariff order for 2025-26. They have sought amendments to ToD charges for withdrawing incentives being given during off-peak hours from 10 PM to 6 AM and continuation of ToD charges during the remaining hours to the said categories of consumers on the ground that they are purchasing costlier power to meet demand to supply to the said categories of consumers to supply from 10 PM to 6 AM and that their revenues are getting affected as a result of giving the incentive of Rs.1.50 per unit to the said categories of consumers
2. TG NPDCL have already increased tariff for eg. HT Cat I (A) Industrial General from November 2024.

Tariff component	RST for 2025-26	previous
Fixed demand Charges Rs/ KVA	Rs.500/-	Rs.475/-

This has already increased per unit power cost from TG NPDCL to Industries.

In view of above, we request the Hon'ble Commission to examine the following points, among others:

- a) The purpose of introducing ToD charges apparently is to persuade consumers of the said categories to shift their timings of power consumption from peak hours to off peak hours.
- b) Peak or off-peak consumption of power depends on requirement of power by various categories of consumers during specific hours and periods, not on any abstract principle.

- c) As incorporated in the RSTO for 2025-26, the DISCOMs have simply pointed out that "the Licensees proposed ToD time zones for peak, off peak and incentive hours depending on the demand on the grid to clip the peak demand, thereby reducing the purchase of power from short term sources."
- d) **RFCL, being a continuous process industry, is being run in three shifts of 8 hours each throughout the year. Accordingly there is simply no scope for it to shift its running to off peak hours.** ToD cannot achieve that objective, except imposing additional burden on such industries. Power intensive and continuous process industries are already in doldrums, unable to compete with the kind of costs of inputs, including power tariffs. If ToD charges impose additional burden to us.
3. In the RSTO, the Hon'ble Commission has observed: "The Commission has noted the submissions of various stakeholders regarding the implementation of Time-of-Day (ToD) tariffs. The primary objective of ToD tariffs is to optimize power consumption patterns, reduce peak load demand, and shift consumption to off-peak hours, thereby ensuring better grid management and cost efficiency."
4. The Commission acknowledges that a well-designed ToD tariff structure helps in flattening the load curve, which is crucial in minimizing the need for expensive power procurement during peak hours. By encouraging consumers to shift their consumption to off-peak hours through appropriate incentives, the overall power purchase costs of the DISCOMs can be reduced.
5. Though RFCL Ramagundam is drawing minimum power i.e. approx. 50 units per KVA, RFCL is paying around 24 Crore per annum against Minimum Demand charges. Therefore any higher side revision of TOD Charges will be an additional burden on RFCL.

Therefore, the Hon'ble TGERC Commission is requested to peruse TG NPDCL proposal so that continuous process Industries are not burdened with the extra tariff and take decision in future tariff orders to ensure that ToD tariffs serve their intended purpose of efficient load management and grid stability while maintaining a fair balance between consumer interests and DISCOM sustainability.

Thanking you
With regards

For and on behalf of
Ramagundam Fertilizers and Chemicals limited,

P. Surendra Babu
04-09-25

(P Surendra Babu)
Dy. Gen. Manager (Elect & IT)

Cc To

1. The Hon'ble Chairman TGERC, Hyderabad

POPURI SURENDRA BABU
DEPUTY GENERAL MANAGER (ELECTRICAL)
Ramagundam Fertilizers and Chemicals Limited
Ramagundam, Dist. Per. Tanali-505210 (T.S)

Name & full address of the Objector along with e-mail 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. Surendra Babu, DGM (Elect.), surendrababu@rfcl.co.in, Mobile:6001791083	Ref. Letter No: RFCL/Elect/TGERC/TGNPDCL/TOD Revision Objection dated 04.09.25	Yes	NO