



DG/COAI/2026/TIC/2149

08 January 2026

Chief Engineer

Telangana State Southern Power Distribution Company Limited (TGSPDC)
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Chief Engineer

The Northern Power Distribution Company of Telangana Limited (TGNPDCL).,
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Sri V. Ramchander

Commission Secretary
Telangana Electricity Regulatory Commission
Email: secy-tgerc@telangana.gov.in

Subject: Aggregate Revenue Requirement (ARR) for FY 2026-27 - Separate Wheeling Charge for Green Energy Sourced Power:

Reference: Public Notification by TGSPDCL and TGNPDCL dated 20.12.2025

Dear Sir(s),

1. At the outset, we would like to introduce ourselves as Cellular Operators Association of India (COAI), a non-profit and non-governmental body with the vision to establish and sustain a world-class telecom infrastructure and facilitate affordable mobile communication services in India. COAI represents the leading Telecom Service Providers (TSPs) and telecom equipment vendors in India, in addition to other Telecom, IT and Infrastructure organizations. COAI is dedicated to the advancement of mobile telephony and broadband through development and provision of world-class infrastructure, products and services,



delivering the benefits of innovative and affordable mobile communication services to the people of India. The Association works closely with Ministries, Policy Makers, Regulators, Financial Institutions and Technical Bodies towards these objectives.

2. We write to you on the referred Public Notice on the proposed wheeling charges, including for the LT category. We thank the Hon'ble Commission for providing stakeholders an opportunity to submit objections and suggestions on the proposed wheeling charges applicable for FY 2026–27.
3. The telecommunication sector is a foundational pillar of the nation's digital economy and serves as the backbone for India's IT and digital services ecosystem. Reliable and uninterrupted power supply is critical for telecom infrastructure such as mobile towers, data centres, and transmission equipment, which enable fast internet, leased line connectivity, and digital services essential for economic growth and the Government of India's 'Digital India' initiatives.
4. We note from the Public Notice that the proposed wheeling charges for LT category consumers have been fixed at Rs. 767/kVA/month for Southern Power Distribution Company of Telangana Limited and Rs. 1,196/kVA/month for Northern Power Distribution Company of Telangana Limited. The proposed levels represent a substantial increase in the fixed cost burden on open access consumers. Such high wheeling charges, when applied uniformly, significantly escalate the overall cost of power procurement, particularly for consumers with geographically dispersed loads and round-the-clock operational requirements, such as the telecom sector. The impact is further magnified for consumers sourcing power under the Green Energy Open Access mechanism, where additional statutory charges already apply, thereby rendering renewable power procurement financially unattractive despite its environmental benefits.
5. We respectfully submit that Green Energy sourced power, by its very nature, has lower plant load factor and efficiency as compared to conventional sources, owing to intermittency and variability of renewable generation. Applying uniform wheeling charges without accounting for these inherent characteristics makes Green Energy Open Access (GEOA) economically unviable for consumers for the telecom sector, which is otherwise committed to increasing renewable energy adoption in line with national sustainability goals.
6. In view of the above, we strongly urge to define and notify a separate and rational wheeling charges per unit specifically for Green Energy sourced power. Without such differentiation, the high wheeling charges per unit will negate the intended benefits of GEOA and discourage telecom sector from transitioning to renewable energy, thereby undermining



both environmental objectives and policy intent.

7. We therefore request you to kindly consider our concerns and provide appropriate relief by prescribing a separate, lower wheeling charge framework for Green Energy sourced power, so as to ensure long-term viability of GEOA and promote sustainable energy usage by essential service sectors such as telecommunications.

COAI Request

We respectfully pray to notify a separate wheeling charge for Green Energy sourced power, considering its inherent intermittency and lower efficiency or define wheeling charge per unit (Rs/kwh) so as to ensure the viability of Green Energy Open Access and promote renewable energy adoption.

We trust our submission will merit your kind consideration and look forward to the valued support of your good office in this important matter.

Thanking you in anticipation,

Sincere regards,

Signed on: 08-01-2026 15:00:24

Digitally Signed by:

Lt Gen Dr SP Kochhar

DG

COAI

Signature Valid From: 2025-02-22 10:45:32

Valid To: 2026-02-22 10:45:32

Lt. Gen. Dr. S.P. Kochhar, AVSM, SM, VSM, ADC, KIGA**

Former Signal Officer in Chief, Indian Army

Fellow IETE, Fellow AIMA, Member IEEE, Sr. Member CSI

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Copy to:

Dr. Justice Devaraju Nagarjun

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