

इंडियन ऑयल कॉर्पोरेशन लिमिटेड

(विपणन प्रभाग) रामगुंडम डिपो, राजीव रहदारी,
कुंदनपल्ली गांव, अंतरगांव मंडल, पेदापल्ली जि.-505 208.

Indian Oil Corporation Limited

[Marketing Division] Ramagundam Depot,
Rajeev Rahadhari, Kundanapally Village,
Anthergaon Mandal, Peddapalli Dist.-505 208.
Phone No : 08728-272033



IndianOil

विपणन प्रभाग
Marketing Division

Ref: IOCL/RMD/ELEC

Date: 23.02.2026

To

The Commission Secretary
Telangana State Electricity Regulatory Commission (TGERC)
Vidyut Niyantaran Bhavan
Kalyan Nagar, Hyderabad

**Subject: Rejoinder to the Response filed by TGNPDCL in O.P. No. 79 of 2025 –
Regarding Re-categorization of HT Service Connection No. PDL027 (IOCL
Ramagundam Depot)**

Reference: IOCL Ramagundam Depot letters dated 28.12.2023, 26.06.2025,
26.07.2025, 05.09.2025, 17.10.2025, 08.12.2025, 07.02.2026

Respected Sir/Madam,

With reference to the response submitted by TGNPDCL opposing the request for re-categorization of HT Service Connection No. PDL027 of IOCL Ramagundam Depot from **HT-II (A) – Commercial** to **HT-I (A) – Industrial**, IOCL respectfully submits this rejoinder for kind consideration of the Hon'ble Commission.

1. Nature of Blending Operations

The blending of Ethanol Blended Motor Spirit (EBMS) and B7 High-Speed Diesel at Ramagundam Depot is not a mere transfer activity. The process involves metered injection systems, pump-driven circulation, homogenization, and quality control testing to meet statutory specifications. The blending process alters the chemical composition and characteristics of the base petroleum product and results in a commercially distinct product.

2. Applicability of Clause 4.16.1 – HT-I Industrial Category

As per Clause 4.16.1 of the Tariff Order dated 29.04.2025, HT-I category applies where electricity is used for **manufacturing**, processing or **preservation** of goods.

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A manufacturing/processing activity is defined as a set of physical, chemical, or mechanical operations that transform raw materials or intermediate goods into finished products by altering their properties, composition, or characteristics using machinery, power, and labour.

Electricity at the Depot is used for blending operations, pumping systems, circulation mechanisms and related processing infrastructure. Blending of petroleum products and biofuels is a controlled process using automation systems which results in change in chemical properties and enhances the fuel properties like RON, lower emissions, etc. It constitutes processing and cannot be construed as simple mixing. Therefore, the essential requirement of manufacturing and processing stands satisfied.

In addition to blending of Biofuels, the depot also makes XP-95 and XP green branded fuels of IOCL by a controlled dosing of proprietary additives.

It may also be noted that all the above operations are carried out from control room without any manual intervention through Honeywell make Automation System.

The Depot is also equipped with a Vapour Recovery Unit (VRU) that recovers petroleum vapours and converts them into liquid form through an industrial process.

3. Misapplication of Clause 4.17.1

The classification under HT-II(A) for Gas/Oil Storage and Transfer Stations is applicable to facilities engaged solely in storage and transfer. Ramagundam Depot undertakes statutory blending operations which involve processing activities beyond mere storage and transfer. Hence, classification under HT-II(A) is not appropriate.

5. Coverage under the Factories Act

The establishment holds a valid Factory License and is governed by the Factories Act, further substantiating that the operations fall within the ambit of industrial activity.

6. It is further submitted that other IOCL terminals in the State of Andhra Pradesh performing identical industrial operations—such as Rajahmundry, Kakinada, Guntakal, and Chittoor—are categorized under the HT- Industrial tariff category.

Prayer

In view of the above submissions, Ramagundam Depot of IOCL most respectfully prays that the Hon'ble Commission may:

- (i) Hold that blending operations constitute processing within the meaning of Clause 4.16.1;
- (ii) Consider for re-categorization of HT Service Connection No. PDL027 from **HT-II(A) – Commercial to HT-I(A) – Industry General**; and


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(iii) Grant consequential tariff revision accordingly.

Ramagundam Depot IOCL further requests an opportunity of personal hearing to elaborate on the technical aspects of blending operations.

We shall be grateful for your kind and favourable consideration.

Yours faithfully,

For Indian Oil Corporation Limited



SDM,

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