NORTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED

Responses to Objections / Suggestions

On

Aggregate Revenue Requirement(ARR) for Retail Supply Business & Tariff proposals including CSS for FY 2026-27

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1. Response to Sri. M Venugopala Rao, Senior Journalist & Convener, Centre for Power Studies.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	The projected revenue gap works out to 30% of projected ARR. Though the DISCOMs have not proposed any tariff revision, they have not made submissions as to how they would bridge the projected revenue gap. By implication, it may be considered that for bridging the revenue gap to be determined by the Hon'ble Commission, the state government may agree to provide required subsidy. We welcome such a development.	TGDISCOMs humbly request Government of Telangana to fulfill the requested revenue gap. TGDISCOMs shall abide by the directions of the Hon'ble Commission with regard to revenue gap.
2.	Even if no tariff revision takes place for the FY 2026-27, it is difficult to presume that there would be no additional burdens on the consumers. For the FY 2024-25, NPDCL has shown a net revenue gap of Rs.1086 crore, while SPDCL has shown a net revenue gap of Rs.589.92 crore. The DISCOMs have not prayed for any specific order of the Commission on treating the projected revenue gaps, except submitting that "pass such order as the Hon'ble Commission may deem fit and proper in the facts and circumstances of the case." Though permitted by the Commission, the DISCOMs have not been availing themselves of the opportunity to collect FSA not more than 30 paise per unit every month.	The DISCOMs have not sought any specific direction at this stage regarding recovery of the projected revenue gaps and have left the matter to the regulatory discretion of the Hon'ble Commission. With regard to Fuel Surcharge Adjustment (FSA), while the Commission has permitted recovery up to the prescribed limit. TGNPDCL is not levying FSA, as the DISCOM is addressing letter to Government of Telangana for arranging payment of FSA.

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3.	For their distribution business for the FY 2024-25, the DISCOMs have filed their petitions, seeking true up of Rs.484 crore by TGNPDCL and Rs.545.18 crore, stating that the amount is “transferred to RSB of 2026-27”. We request the Hon’ble Commission to include in the ARR of the DISCOMs for 2026-27 the amounts claimed under true-up for their distribution business for 2024-25 and net revenue gaps shown for the same FY to the extent it determines as permissible by issuing orders after holding public hearings. True-up claims for distribution business of the DISCOMs, transmission business of TGTRANSCO and various generators of power for the FY 2025-26 also would come up, adding to the true-up claims for retail supply business of the DISCOMS for the same FY to be claimed during 2026-27.	TGNPDCL, in its filings before the Hon’ble Commission, has submitted that the true-up gap pertaining to its Distribution Business for FY 2024-25 may be considered for recovery in the Aggregate Revenue Requirement (ARR) for FY 2026-27 for distribution business only and these are not included or transferred to Retail Supply Business. In line with this request, the true-up amount for FY 2024-25, as filed by the Licensee, has been duly incorporated in the ARR projections for FY 2026-27 for Distribution Business.
4.	We request the Hon’ble Commission to not treat fully or partly the revenue gap it determines for FY 2026-27 in the subject petitions as regulatory asset. There has been no instance of treating revenue gap of the DISCOMs for any FY since regulatory process started in the undivided Andhra Pradesh and after bifurcation of the state in both the Telugu states. The DISCOMs continue to be in financial doldrums, with abnormal dues pending from the government and various	TGDISCOMs have filed revised ARR for FY 2026-27 as per MYT Regulation 2 of 2023 laid out by Hon’ble commission. TGDISCOMs shall abide by the directions of the Hon’ble Commission with regard to treatment of revenue gap.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	categories of consumers and dues to be cleared by them to generators of power and others. Treating any amount as regulatory asset would further intensify the financial difficulties of the DISCOMs and the accumulated burden, with carrying cost, would hang as Damocles' sword on the necks of the consumers.	

2. Response to Ms. ITC Limited, Paperboard & Specialty Papers Division on objections to Grid Support Charges

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	2. The captive generation of electricity at the Objector's aforesaid plant is by the cogeneration process whereby heat energy used for pulp cooking, humidification, and drying is produced along with electricity. The said plant presently has seven T-G Sets of varying capacities aggregating to about 260.187 MVA. Four TG-Sets of 95.5 MVA is kept as a stand-by. The TG-sets and the loads are segregated into two networks internally, with 88 MVA in one network and 76.687 MVA in another network. Under normal operation, the TG-Sets are operated in island mode and the entire load is met exclusively from the TG-sets, no power being consumed from TGNPDCL. The Consumer Service with TGNPDCL is presently with a CMD of 15MVA at 132 kV. Power is drawn from TGNPDCL within the CMD of 15 MVA partly for start-up purposes of the TG-sets and partly as standby power. The starting currents of motors during start-up is minimised by soft start arrangements. The power drawn during start-ups is always well within the CMD of 15 MVA.	The Objector claim that it does not avail any grid support is not tenable because it maintains a live 132 kV grid interconnection with a CMD of 15 MVA and routinely relies on the grid for start-up, stand-by, and open-access import operations. Even if its TG sets generally operate in island mode with internal interlocks, the grid must remain continuously available to provide voltage and frequency reference, system strength and fault level, protection coordination, and back-up clearing capability at the point of interconnection. These services impose real obligations and costs on the licensee regardless of whether actual load transfer occurs during contingencies. Compliance with harmonic limits or internal protection schemes does not negate the need for the grid to maintain required reliability and protection standards for a connected consumer. Therefore, the assertion that "no grid support is actually availed" is incorrect; the Objector's own operational arrangement establishes dependence on the grid. Accordingly, the levy of grid support charges remains justified, and the objection does not warrant any deviation.

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	The said plant also receives and consumes power from its wind energy plant in Andhra Pradesh through inter-state open access. Under normal operation, the connection with the grid is only to enable import of the energy under open access. At such times, only one of the networks is connected to the grid. There are electrical inter-locks in place to ensure that the connected loads trip whenever there is a tripping of the TG-Sets. Therefore, there is no transfer of load to the grid in the event of TG-Set failure or shut down. Mandatory protection arrangements are in place to clear internal faults within the time prescribed in the Grid Code. In the normal operation of ITC's continuous process plant, there are no equipment which impose intermittent or transient loads. There is no harmonic injection from ITC's plant in excess of permissible limits. Therefore, there is no circumstance by which it can be considered that any grid support is actually availed by ITC. The connection to the grid is utilised only for startup power or stand-by within the CMD with TGNPDCL or for import of open access power.	

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2.	TGNPDCL and TGSPDCL have proposed levy of grid support charges ("GSC") for the FY 2026-27 at the rate of Rs. 18.50 Rs/kW/Month X (total installed capacity of the generators connected to the Grid – OA capacity or the PPA capacity if any with the DISCOMS). The proposal of GSC is unreasonable and is being challenged herein both in respect of the levy itself as well as the quantum. The proposal of GSC is wholly misconveived and without any proper understanding or consideration of the concept of grid support/parallel operation as explained hereinafter.	The Hon'ble Commission has determined the GSC as per the technical committee report of the Grid Coordination Committee duly considering the objections of the members of the committee towards the end of the Financial Year 2023-24 and directed the Licensees to file the proposals afresh for FY 2024-25. Therefore, based on the directions of the Hon'ble Commission, the DISCOMs have proposed the Grid Support Charges. The licensee has computed Grid Support charges as per the methodology approved by Hon'ble Commission vide order O. P. Nos. 80 & 81 of 2022 dated 27.03.2024. The excerpt of the clause 4.1.13 is shown below *"At this stage, when the Retail Supply Tariffs are already fixed for FY 2023-24 and the Financial Year is at the fag end, the commission is not willing to determine GSC for FY 2023-24 and directs TSDISCOMs to file a separate petition for determination of GSC for FY 2024-25 onwards duly following the methodology approved in this order"* Hence, the licensee has adopted the methodology approved in the above order for computation of Grid Support Charges for FY 2026-27.
3.	Classification of Captive Power Plants (CPPs) operating in parallel with the grid Sl. No. 4	The Objector's classification of CPPs into multiple categories to argue selective non-applicability of Grid Support Charges (GSC) is misplaced. Any CPP that remains synchronized or interconnected with the grid—whether for start-up, stand-by, export, import, wheeling, or RPPO compliance—necessarily depends on the grid for system strength, voltage and frequency reference, protection

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		coordination, fault-level support, and reliable operation at the point of common coupling. These technical requirements exist irrespective of the quantum of actual drawal or whether the CPP exports or operates in island mode during normal operation.
4.	• Fallacies in the premises and assumptions of Discoms in seeking to justify GSC. **Para 5 to 9**. • Need for Evolution of Criteria to determine when and to what extent grid support may be considered to have been availed. **Para 10 to 12** • Open Access Source vs CPP source of power **Para 13 & 14** • Non Co-located CPPs and Merchant/Independent Power plants **Para 15** • Roof-top Solar generation **Para 16 to 18** • Quantification of Grid Support Charge as proposed by Discoms **Para 19** • Earlier reports of Grid Co-ordination Committee on Grid Support Charges are seriously faulty, insufficient and	The objections raised from paragraphs 5 to 32 are based on incorrect premises and unfounded assumptions about the nature, extent, and applicability of Grid Support Charges (GSC). The Objector's attempt to differentiate CPPs, open-access sources, rooftop solar, merchant plants, or non-co-located generators does not alter this underlying technical and regulatory reality. The suggestion that GSC requires a fresh "evolution of criteria" ignores the established jurisprudence and cost-of-service framework under which parallel operation and grid synchronisation are recognised as imposing system-level obligations on the licensee. Likewise, contentions regarding earlier technical committee reports, alleged non-consideration of industry-specific scenarios, or the need for a separate proceeding do not undermine the Commission's authority to determine compensatory charges within the tariff process. Similarly, arguments raised in respect of open-access imports versus CPP generation, renewable co-located plants, rooftop installations, or partial-load CPPs overlook that CMD entitlements deal only with rights of consumption, not the broader system-readiness obligations that arise from synchronous parallel operation. The reliance on installed capacity as the basis for quantification is neither arbitrary nor disproportionate; it reflects the extent to which the connected

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	based on non-consideration of relevant industries besides being in violation of principles of natural justice **Para 24 to 31** • Need for separate proceeding on the issue of GSC **Para 32**	generator influences fault levels, stability margins, and protection-system requirements. Consequently, the proposal of DISCOMs to levy GSC and the methodology adopted are both reasonable and consistent with technical standards, regulatory principles.
5.	The Hon'ble Commission may (a) cause a scientific study to be conducted by an appropriate technical organisation on the issue of the actual incidence of availment of grid support by CPPs of different types of industries and the appropriate methodology of computation of the quantum of grid support charges for each such type of industry; and (b) issue a discussion paper on the levy and quantification of grid suport charges for different types of industies; and (c) evolve the criteria as to when and to what extent grid support can be considered to be availed and to determine the charges leviable duly differentiated on the nature of load and/or nature of the industry duly providing for hearing of the affected parties.	The existing framework sufficiently enables stakeholder consultation, technical scrutiny, and differentiation where justified, and therefore the Objector's request for additional processes does not merit acceptance.

Response to ITC Limited, Paperboard & Specialty Papers Division on objections to ARR for FY 2026-27

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	The TGNPDCL has considered additional charges during peak ToD, however they have not considered any incentive during off-peak ToD hours. It is requested to review durations considered for normal, peak and off-peak hours as they are not like earlier ToD hours since green power (solar) is available during day hours, so it is requested to decide normal, peak and off-peak hours based on the prevailing scenario. It is also requested to consider at least 1 Rs./unit incentive during the Off-peak hours. Else, the normal rate shall be allowed for 24X7.	The TGDISCOMs are presently examining the possibility of introducing incentives during solar availability hours in line with the Electricity (Rights of Consumers) Amendment Rules, 2023 and shall place appropriate proposals before the Hon'ble Commission for consideration.
2.	As MNRE repor/ data a total of 28723.65 MW RE capacity is added in FY2024-25 and 34725.26 MW is added alone in FY2025-26 till 31st Dec'25. In view of such huge capacity addition into the grid the green energy prices is much lower than the previous year by at least 1-2 Rs./unit in FY2025-26 compared to FY2024-25 (the box plots of green power market rates are attached). In view of this it is requested to the Hon'ble Commission to pass on the benefit to the consumers instead of continuing the tariff for the next FY.	The TGDISCOMs submit that consumer tariffs are determined based on the overall power purchase cost borne by the DISCOMs, including long-term PPAs and short-term procurement, along with associated transmission and other costs, and not solely on market prices of short-term power purchases. Any benefit through reduction in power procurement costs, will be appropriately reflected in tariffs.
3.	Since the green power is available in the market it is requested to waive off the CSS and Additional surcharge on CSS. At least It is	The TGDISCOMs submit that CSS and Additional Surcharge (AS) are levied to compensate the distribution licensee for loss of cross-subsidy and

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	requested to consider 50% waiver for wheeling of green energy from any source.	to recover fixed costs arising from long-term power procurement agreements. As per the Terms and Conditions of Open Access Regulations, 2024, waiver of CSS and AS has already been provided to eligible green energy open access consumers as specified therein. However, granting further waiver merely on the ground that green power is available in the market would defeat the very purpose for which these charges are levied.

3. Response to National Highways Authority of India

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	Streetlights on National Highway fall under LT-VI Category 35. In terms of the Retail Tariff Order dated 29.0.1.2025 and 28.10.2024. LT-VI category includes supply of energy for lighting on public roads. streets. Thoroughfares including Parks. Markets, Cart-stands. Taxi stands. Bridges and also for PWS schemes in the Local Bodies viz., Panchayats/Municipalities/Municipal Corporations. Accordingly. it is evident that LT-VI Street Light category is applicable, among others, fur lighting in public streets/ thorough fares which are open to the general public. 36. Further, LT-VI Street Light category is a distinct category specifically designed to cover street lighting for public use. The usage of the word "including" makes it evident that LT-VI Street light category is an inclusive category and would cover any street lighting which serves a public utility function. Accordingly, street lighting on National Highways ought to be categorized under the LT-VI Street Light category, as it is intended for public safety.	➢ As per the existing Retail Supply Tariff Order, only those street lighting services operated by Local Bodies viz.,Panchayats/ Municipalities/Municipal Corporations are categorized under LT VI (A) Street Lights. ➢ In view of the above, as the street lights maintained by NHAI do not fall in the purview of local body and in any other LT category, the same are to be categorized under LT II Non Domestic/Commercial category as per the terms and conditions of Retail Supply Tariff Order. ➢ Street lighting maintained by NHAI in access-controlled highways are under LT-II(B) Commercial as they are of access-controlled highways wherein consumers are charged a toll to access and use such highway facilities. The act of charging a toll to access / use any facilities comes under the purview of commercial use and as such the street lighting maintained by NHAI are to be considered under LT-II (B) category. ➢ The Hon’ble Commission differentiates the tariff for street light services of the local bodies viz.,Panchayats/Municipalities /Municipal Corporations based on the tax revenue of the respective bodies. However, NHAI is collecting the toll fee from all the commuters on the National Highways. Hence, the billing category LT-II(B) considered is very much justified. ➢ The main intention of providing subsidized tariff for Street light services
3.	Financial Loss: It is submitted that if street lighting on National Highways continues to be categorized under the	

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	LT-II (B) Commercial category, it will result in significant financial hardship for the NHAI. The tariff differential between the LT-II (B) (with Rs. 11/- unit for above 500 units) and LT-VI (A) (with Rs. 7.10/- unit) categories is substantial, with a difference of approximately Rs. 3-4 per unit (approx.35% -36%). This tariff differential will impose a heavy financial burden on NHAI since it is obliged to meet these increased costs for public safety measures. Accordingly, it is critical that streetlights on National Highways be categorized under LT-VI (A) Street Light category.	maintained by the local bodies is due to the limited tax revenue collected by them. Apart from the street lighting, the local bodies also provide additional services like drinking water, sanitization, primary health centers. The funds allotted by the local government to the local bodies are nominal only. Whereas the NHAI is being funded by the Central Govt as per the projects being undertaken. In addition to which, the NHAI is collecting the toll from the commuters which ensures revenue neutrality. ➢ If the request of NHAI for subsidized tariff on par with local bodies is considered, the Cross subsidy burden will increase on other category consumers which is against to the provisions of National Tarif Policy 2016. ➢ NHAI cannot be treated on par with local bodies. ➢ Hence, the Licensee requests the Hon'ble Commission to retain the existing LT-II(B) Category to the Street light services maintained by NHAI.
2.	It is pertinent to mention that Mission Bhagiratha, a safe drinking water project for every village in Telangana State, was initially not included under the LT-VI Category. However, Telangana Discoms in their Petition for determination Retail Supply Tariffs & Cross Subsidy Surcharge for FY 2023-24 proposed to categorize all Mission Bhagiratha services under LT-VI(B) or HT-IV(B) as applicable for respective voltage levels. This Hon'ble	Mission Bhagiratha, a flagship welfare program of the Government of Telangana for providing safe drinking water to every village, was classified under the LT-VI category at the time of its introduction itself, considering its public-utility and non-commercial nature, and the Hon'ble Commission subsequently reaffirmed this classification by approving its inclusion under LT-VI(B)/HT-IV(B) vide Tariff Order dated 24.03.2024; in contrast, access-controlled highways operate on a toll-based, user-pay model and therefore cannot be compared with Mission Bhagiratha for tariff classification.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	Commission vide Retail Supply Tariff Order dated 24.03.2024 approved the proposal of Telangana Discoms and modified the applicability of LT-VI(B) category and HT-IV(B) category to include Mission Bhagiratha scheme (a scheme intended for public safety), as under: -	

Existing 'Applicability' clause before inclusion of Mission Bhagirathi Schemes	Approved 'Applicability' clause including Mission Bhagirathi Schemes under LT-VI Street Lighting and PWS Schemes category as per Retail Supply Tariff Order dated 24.03.2024
9.7. LT-VI: STREET LIGHTING AND PWS SCHEMES	9.7. LT-VI: STREET LIGHTING AND PWS SCHEMES
Applicability	**Applicability**
9.7.1. Applicable for supply of energy for lighting on public roads, streets, thoroughfares including Parks, Markets, Cart-stands, Taxi stands, Bridges and also for PWS schemes in the Local Bodies viz., Panchayats/ Municipalities/ Municipal Corporations. Metering is compulsory irrespective of tariff structure.	9.7.1. Applicable for supply of energy for lighting on public roads, streets, thoroughfares including Parks, Markets, Cart-stands, Taxi stands, Bridges and also for PWS schemes and Mission Bhagiratha schemes in the Local Bodies viz., Panchayats / Municipalities / Municipal Corporations. Metering is compulsory irrespective of tariff structure.
[...]	[...]

It is submitted that same relief of inclusion of National Highways under LT-VI (A) Street Light' category. may be granted by this Hon'ble Commission while determining the Tariff and ARR in O.P Nos. 79 and 80 of 2025 for Telangana Discoms.

4. Response to Sri. M. Gopal, Chief Electrical Distribution Engineer, South Central Railway, Secunderabad

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	Indian Railways is a vital and largest transport organization of Government of India, have vast network for surface transport accessible to all sections of society and play important roles in economic and financial growth of the country. Railways serve the public at large and being a public utility, it should be supplied with electricity at a reasonable price which would reduce its requirement for diesel. In the process there would be saving of foreign exchange. It will also prevent upward revision of fares for transportation of passengers and goods by the Railways. If the fare for passengers & Goods is increased to offset fuel (energy) cost, it will add to overall inflation.	It is submitted that TGDISCOMs cater to the general public and, as public utilities, are obligated to supply electricity at reasonable and affordable rates to all categories of consumers, including domestic, commercial, industrial, railways & traction, agriculture, and others. Since inception, TGDISCOMs have been providing reliable and quality power supply to all consumers by continuously strengthening and expanding the distribution network across the entire state.
2.	South Central Railway avails traction power through 31 TSSs at 132 kV Traction sub-stations in the state of Telangana. The total connected load is 474 MVA and total consumption of Railway traction is 1302 million units projected for the year 2025-26 and paying a substantial amount of Rs. 914 Crores to DISCOMs in Telangana state. The Railways is a bulk consumer and pay major revenues to TGDISCOMs. Hence, the grievances of Railways are to be considered while fixing the tariff for HT-V (A) category.	TGDISCOMs have the responsibility of serving all categories of consumers, including both small and bulk consumers, and have accordingly proposed the tariff after carefully considering the implications for all consumer segments. It is respectfully submitted that, without adequate recovery of the costs incurred in procurement, distribution, and maintenance, the DISCOMs would not be in a position to ensure supply of electricity to it's consumers.

<table>
<tr><th>S.No.</th><th>Summary of Objections / Suggestions</th><th>Response of the Licensee</th></tr>
<tr><td>3.</td><td>The Railways is a bulk consumer and pay major revenues to TGDISCOMs. Hence, the grievances of Railways are to be considered while fixing the tariff for HT-V (A) category.</td><td>TGDISCOMs acknowledge the grievances submitted.</td></tr>
<tr><td>4.</td><td>Government of India and state governments have taken policy decisions to encourage public/private electric road vehicles for decarbonization of transport system to reduce carbon footprint and protect the environment. Government of India (Ministry of Railways) took policy decision to electrify its entire existing Railway network over Indian Railways on fast-track mode to enrich carbon free transportation and 99.2% of BG routes of IR have been electrified.
The hike in electricity tariff of Railway Traction will affect the operating cost of Railways, which may result in high freight charges, commodity prices and thereby rise in inflation and burdening common man and public of all sectors.
Rising operating costs in a labor-intensive Railway organization have a direct impact affecting financial sustainability, manpower planning and employment expansion.</td><td>TGDISCOMs make continuous efforts to provide electricity to people across Telangana at affordable prices. Even though the costs of power purchase, operations, and maintenance have gone up over the years, tariffs were not revised over past decade, except for the increase during FY 2022–23.</td></tr>
<tr><td>5.</td><td>Cost of Service for Railway Traction: The proposed Cost of service for Railway Traction is as follows:<table><tr><th>Discom</th><th>Cost of Service Rs/KWH</th></tr><tr><td>TGSPDCL</td><td>5.97 (As per the ARRs submitted)</td></tr><tr><td>TGNPDCL</td><td>5.63 (As per the ARRs submitted)</td></tr></table></td><td>As per Clause 8.3 of the National Tariff Policy, 2016, tariff design is based on the linkage of tariffs to the Average Cost of Service not the category cost of service.</td></tr>
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<tr><th>S.No.</th><th>Summary of Objections / Suggestions</th><th>Response of the Licensee</th></tr>
<tr><td></td><td>
<table>
<tr><td>Average</td><td>5.80</td></tr>
</table>
The comparison of cost of service and existing/proposed tariff for Railway traction HT-V(A) category is given below.
<table>
<tr><th>Year</th><th>Average COS of Discoms</th><th>Existing/Proposed Traction tariff</th><th>% Variation</th></tr>
<tr><td>2026-27</td><td>5.80/KWH</td><td>7.03/KVAH</td><td>21%</td></tr>
</table>
From above, it may be seen that the traction tariff is higher by 21% over cost of service which is against the provisions of National Tariff policy.
The COS is being calculated in terms of KWh and energy is being charged for Railway traction in terms of KVAh.
National Tariff Policy:
As per the National Tariff Policy-January 2016, the tariffs shall progressively reflect the Cost of Supply. From the table above, it is noted that the percentage difference between the average cost of service of the two DISCOMs and the traction tariff proposed is 21% more, which is in contravention to the National Tariff Policy.</td><td>And the tariff for traction service is within 20% of Average Cost of Service of state/ DISCOM in line with national Tariff Policy 2016.</td></tr>
<tr><td>6.</td><td>Existing/Proposed Traction Tariff for 2026-27:
Existing/proposed traction tariff with demand charges of Rs. 500/kVA and Energy Charges Rs.5.05/kVAh, which is equivalent to Rs.</td><td>When compared with the prevailing tariffs in comparable states, Telangana does not levy the highest electricity tariff. A comparison of demand charges and energy charges across comparable states is presented below:</td></tr>
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<tr><th>S.No.</th><th>Summary of Objections / Suggestions</th><th>Response of the Licensee</th></tr>
<tr><td></td><td>
7.03/kVAh is already at very high and unreasonable for national transporter like Railways.
• Higher traction tariff slashes Rate of Return (ROR) for the new electrification projects, existing electrification projects and upgradation of existing electrification works which are under progress and may make them non- viable.
Further, it is worth to mention that SC Railways operates train services around the clock both during the day and at night, contributing to maintain and increase grid stability during off-peak load hours.
The details of existing Railways Traction Tariff rates with other states – a comparative statement:
<table>
<tr><th>Sl. No.</th><th>State</th><th>Demand Charges In Rs./kVA</th><th>Energy Charges in Rs./kVAH</th><th>Average Unit Price in Rs.</th></tr>
<tr><td>1</td><td>Odisha</td><td>250</td><td>5.30</td><td>6.29</td></tr>
<tr><td>2</td><td>Kerala</td><td>250</td><td>4.80</td><td>5.79</td></tr>
<tr><td>3</td><td>Chhattisgarh</td><td>375</td><td>5.25</td><td>6.74</td></tr>
<tr><td>4</td><td>Maharashtra</td><td colspan="2">Under Open Access</td><td>5.84</td></tr>
<tr><td>5</td><td>Karnataka</td><td colspan="2">Under Open Access</td><td>6.09</td></tr>
<tr><td>6</td><td>Madhya Pradesh</td><td colspan="2">Under Open Access</td><td>5.60</td></tr>
<tr><td>7</td><td>Gujarath</td><td colspan="2">Under Open Access</td><td>5.72</td></tr>
<tr><td>8</td><td>Jharkhand</td><td colspan="2">Under Open Access</td><td>5.16</td></tr>
<tr><td>9</td><td>Bihar</td><td colspan="2">Under Open Access</td><td>6.32</td></tr>
<tr><td>10</td><td>Uttar Pradesh</td><td colspan="2">Under Open Access</td><td>5.67</td></tr>
</table>
</td><td>
<table>
<tr><th>S.No</th><th>State</th><th>Demand charge (Rs/KVA)</th><th>Energy charge (Rs/Unit)</th></tr>
<tr><td>1</td><td>Telangana</td><td>500</td><td>5.05</td></tr>
<tr><td>2</td><td>AP</td><td>350</td><td>6.50</td></tr>
<tr><td>3</td><td>Karnataka</td><td>355</td><td>6.50</td></tr>
<tr><td>4</td><td>Tamil Nadu</td><td>608</td><td>7.75</td></tr>
<tr><td>5</td><td>Maharashtra</td><td>650</td><td>7.29</td></tr>
</table>
The above comparison demonstrates that the tariff applicable to the Railway category in Telangana is competitive and is either comparable to or lower than the tariffs prevailing in other similar states.
TGDISCOMs further submits that power purchase costs, generation mix, geographical factors, renewable availability, and PPAs vary significantly from state to state. Accordingly, the cost of supply and tariff structure cannot be uniform across states, and tariffs are necessarily reflective of state-specific conditions.
</td></tr>
</table>

<table>
<tr><th>S.No.</th><th>Summary of Objections / Suggestions</th><th>Response of the Licensee</th></tr>
<tr><td></td><td>The details of average unit cost of open access rates over Indian Railway and traction tariff rates in Telangana state – a comparative statement:
<table><tr><th>Sl. No.</th><th>Financial Year</th><th>Average unit cost in Rs/Unit in the states under open access over Indian Railways.</th><th>Average unit cost in the state of Telangana in Rs/Unit</th><th>Difference in Rs.</th></tr><tr><td>1</td><td>2021-22</td><td>5.56</td><td>5.72</td><td>+0.16</td></tr><tr><td>2</td><td>2022-23</td><td>6.40</td><td>7.00</td><td>+0.60</td></tr><tr><td>3</td><td>2023-24</td><td>6.14</td><td>6.94</td><td>+0.80</td></tr><tr><td>4</td><td>2024-25</td><td>5.68</td><td>7.03</td><td>+1.35</td></tr><tr><td>5</td><td>2025-26 (up to Sep-25)</td><td>5.49</td><td>7.03</td><td>+1.54</td></tr></table>• Comparison highlights relative high tariff burden in Telangana state.
• Other states offer traction-friendly tariff structures.
• Align Telangana traction tariff with national benchmarks.
• Tariff rationalization directly impacts freight cost, passenger fares and state economy.</td><td></td></tr>
<tr><td>7.</td><td>Tariff Schedule of Hyderabad Metro Rail (HMR) and Indian Railways:
<table><tr><th rowspan="2">Consumer</th><th colspan="3">Existing/Proposed Tariff</th></tr><tr><th>Demand Charges Rs/KVA</th><th>Energy Charges Rs/KVAh</th><th>Average unit rate Rs/KVAh</th></tr><tr><td>HMR-HT-V(B)</td><td>500</td><td>4.95</td><td>6.93</td></tr><tr><td>Railways HT-V(A)</td><td>500</td><td>5.05</td><td>7.03</td></tr><tr><td colspan="3">% increase over HMR</td><td>1.44</td></tr></table>It is evident from the preceding data that there is a 1.44% more difference in the current tariff between HMR and Railways. Further, it</td><td>The marginally lower tariff provided to HMR aims to support urban transportation, as HMR requires significantly higher investment for pillar construction and overhead traction systems compared to SCR. Further, higher compensation is payable for property demolitions in urban areas. In view of these factors, the Licensees have proposed demand and energy charges to ensure sufficient cost recovery.</td></tr>
</table>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	is worth to mention that SC Railways operates train services around the clock both during the day and at night, contributing to maintain and increase grid stability during off-peak load hours, whereas HMR operates only with a fixed load during the day and no load during the night.	
8.	Electrification of more sections in Telangana: By way of electrification of Railway network in Telangana additional infrastructure will be added, resulting into faster movement of goods and passenger traffic. Ultimately there is every possibility of upcoming industries in Telangana state. Electrification projects recently completed: Electrification Projects completed in last 3 yrs.: 1186 Kms I. Peddapalli - Nizamabad: 178 Km II. Falaknuma– Mahbubnagar Doubling with Electrification:98 Km. III. Malkajgiri – Medchal doubling with Electrification: 24 Km IV. Mahbubnagar – Kurnool Town: 128 Km. V. Medchal - Dharmabad : 166 Km. VI. Devarakhadra – Krishna: 65 Km VII. Janakampet – Bodhan : 27 Km. VIII. Moulali – Ghaktkesar (Quadruppling): 24 Km. IX. Kazipet – Ballaharsha (Tripling): 185 Km. X. Vikarabad – Matakunta: 79 Km.	TGDISCOMs have been undertaking significant capital investments to strengthen and expand the electrical network with the objective of ensuring reliable and widespread access to electricity. Recovery of these costs is therefore essential for the Licensees to sustain operations and continue providing quality, reliable, and uninterrupted power supply to all consumers.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	XI. Akanapet – Medak: 17 Km. XII. Kazipet – Vijayawada (Tripling): 195 Km. 9.2 Electrification projects under progress: 342 Km. i. Kazipet – Balharshah (Tripling): 18 Km ii. Kazipet – Vijayawada (Tripling): 25 Km iii. Medchal – Mudkhed (Doubling): 171 Km. iv. Mahbubnagar-Kurnool Town (Doubling): 128 Km. 9.3 Electrification projects under sanction: 149 Km. i. Manoharabad – Kothapalli: 149 KM. 9.4 Electrification projects under proposal stage and yet to be sanctioned: 622 Km. i. Sattupalli – Kovvur:95 Km. ii. Manugur – Ramagundam:200 Km. iii. Macherla – Nalgonda: 92 Km. iv. Kondapalli – Kothagudem: 125 Km. v. Kazipet – Ghatkesar: 110 Km. a) Above New Line project sections are planned to be electrified in Telangana state. Existing high traction tariff affecting badly and not viable the upcoming electrification projects and slow down the existing projects also in Telangana state and effects the development of infrastructure works in the state of Telangana.	

<table>
<tr><th>S.No.</th><th>Summary of Objections / Suggestions</th><th>Response of the Licensee</th></tr>
<tr><td></td><td>b) Further, Railway Board have chosen Railway network work over Telangana region to upgrade the traction system from existing 1x25 KV system to 2x25 KV system to enhance existing carrying capacity to realize Mission 3000 MT master plan of PMO office, wherein connected loads and power demand are envisaged to increase significantly
c) Details of 2x25 kV AT system upgradation Projects in the state of Telangana over S.C. Railway:

I. 2x25 kV AT system upgradation works awarded and execution in progress:

<table>
<tr><th>Sl.No.</th><th>Section</th><th>Length in Km.</th></tr>
<tr><td>1</td><td>Balharshah-Ramagundam</td><td>142</td></tr>
<tr><td>2</td><td>Secunderabad - Kazipet</td><td>131</td></tr>
<tr><td>3</td><td>Kazipet – Dornakal Jn.</td><td>96</td></tr>
<tr><td>4</td><td>WADI - Vikarabad</td><td>112</td></tr>
<tr><td>5</td><td>Ramagundam - Kazipet</td><td>92</td></tr>
</table>

II. 2x25 kV AT system upgradation works Sanctioned, yet to be awarded:

<table>
<tr><th>Sl.No.</th><th>Section</th><th>Length in Km.</th></tr>
<tr><td>1</td><td>Kondapalli - Khammam</td><td>85</td></tr>
<tr><td>2</td><td>Khammam – Dornakal Jn. – Badrachalam Road.</td><td>78</td></tr>
<tr><td>3</td><td>Mahbubnagar - Dhone</td><td>184</td></tr>
<tr><td>4</td><td>Pagidipalli – Guntur - Motumari</td><td>337</td></tr>
<tr><td>5</td><td>Medchal - Mudkhed</td><td>225</td></tr>
</table>
</td><td></td></tr>
</table>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	d) In the second phase, it is proposed to convert the balance sections from the existing 1 × 25 kV AC traction system to the 2 × 25 kV AC traction system.	
9.	Incentive on Prompt/early payment: Railways are prompt in payment of energy bills to the DISCOMs and for these, Railways certainly deserve some rebate/incentive. Reasonable rebate/incentive for prompt payment be granted as done in Odisha state. In Odisha, Railways entitled to a rebate of 1% (one percent) of the amount of monthly bill (excluding all arrears).	TGDISCOMs acknowledge and sincerely appreciate Railways for prompt payments. However, it is respectfully submitted that, at present, there are no approved provisions or policies within the scope of the DISCOMs that allow for the extension of any rebates or incentives for prompt or early payments.
10.	Off peak time loads for Railway Traction: It is to mention that Railway traction is power intensive and loads are for passenger & goods train services which are run round the clock. There is no distinction of peak to non-peak hours. Thus Railways are improving base loads of DISCOMs and supporting the grid stability. Apart from this, Railways is maintaining higher power factor.	Off-peak incentives are designed to encourage load shifting from peak periods. Railway traction demand is continuous and non-flexible, with no or low scope for load shifting. Since off-peak incentives would not yield any additional operational or demand-management benefit, railway traction is neither penalized during peak hours nor incentivized during off-peak hours.
11.	Unblocking of leading kVArh: As per the Para no. 3.21.20 of Hon'ble TGERC order, Tariff for Retail sale of Electricity for FY-2025-26, has approved the TGDISCOMs proposal for unblocking of leading kVArh for the purpose of kVAh billing with a three (3) months prior notice.	

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	It is prayed to consider the following points from Railways end and relieve the financial burden on Railways due to unblocking of leading kVArh. • Railway traction load changes every moment. Matching reactive power in real time is difficult in this system. • When Railways operate in leading VAR, they supply reactive power to the grid. This supports grid voltage, but increasing kVAh billing due to tariff design, resulting in higher traction energy cost, there by improves voltage profile and reducing upstream system losses. • Fixed capacitor banks stay in service to maintain power factor. During low load, these inject reactive energy into the grid. • Traction loads are inherently dynamic and highly schedule-dependent, which limits effective real-time power factor control. In view of these operational constraints, imposition of power factor penalties under such conditions is technically inequitable. • Traction power varies with train movement and passenger schedules, Railways have limited control over power factor during live operations. Penalizing this is not technically fair. • Grid rules and tariff policies do not mandate billing for leading VAR	a) While traction load is highly variable, reactive power, whether lagging or leading, causes increase in current and thus imposes additional burden on the network. b) Uncoordinated/ Uncontrolled leading reactive power may also cause over-voltage, increase system losses also pose damage to the system. c) Capacitors remaining switched ON during low load conditions injecting reactive energy into the grid causes adverse impact on the grid performance. d) kVAh billing is a cost-reflective mechanism and not a penalty. Operational constraints cannot be a basis for differential treatment, as network impact remains the same. e) Though real-time control is challenging, reactive energy irrespective of its nature affects system capacity and losses, and therefore must be accounted for in billing. f) The Hon'ble Commission, after due examination and consideration of all relevant aspects, has approved the proposal for unblocking of RkVAh lead for kVAh billing, having recognized

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	unless voltage rising issues occur. Railways have not caused such problems. • The current billing method penalizes Railways without giving any credit for helping the grid during off-peak periods, when it helps to maintain grid stability during low load condition, the leading kVARh injected by Railways during low load period acts as a dynamic compensation source that improves grid voltage, stability and reduces the line losses, acting as an ancillary service. Therefore, applying penalties on leading kVARh is technically unjustified. • Installing advanced dynamic compensation needs high investment and long timelines like PQR (Power Quality Restorer). • Railways are a national service. Their power system is not comparable to regular commercial users. "In light of the above submissions, it is prayed that Railways may be exempted from levy of charges on leading reactive energy. The Railway traction system inherently contributes to grid stability, and the occurrence of momentary leading VAR during traction operations is unavoidable and operationally intrinsic. Railways may therefore be considered as a special case, and billing may be confined to lagging reactive energy only, without levying any	the technical necessity and justification for the same. g) As stated by the objector in the queries above, Railway operations are schedule-based and traction loads are dynamic in nature; therefore, any leading reactive power injection occurs only during specific operating periods and not uniformly across all off-peak hours. Hence, such intermittent and non-dispatchable reactive power cannot be considered as a consistent grid support service warranting credit. h) The Commission has provided advance notice for implementation. Consumers may adopt appropriate power factor correction measures in a phased manner. i) TGDISCOMs respect Railway's role in national service. However, the tariff design must remain non-discriminatory and cost-reflective across TGDISCOM's consumer categories.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	charges on leading reactive energy (kVArh)" to avoid financial burden on the Railways.	
12.	Railways Planning to avail traction power through open access. • It is brought to the kind notice of the Hon'ble commission; Indian Railways are already availing power through "Open access" in 14 states. The "Deemed Distribution Licensee" status of Railways is under sub-judice at Hon'ble Supreme Court. However, Hon'ble Supreme Court in its interim orders dated 06.05.2024 and 08.11.2024, clarified that open access for Railways shall not be denied and cross subsidy and additional surcharges are not liable to pay till final order of the Hon'ble Supreme Court. South Central Railway submitted application for grant of GNA NOC with TGTRANSCO on 17.06.2025 to avail power through open access as" Drawee entity connected with Intra-State Transmission System" as per CERC, General Network Access (GNA) Regulations'2022. • Availability of ABT meters is a mandatory requirement for availing power through Open Access. An amount of ₹14.30 crore was deposited with TGTRANSCO by Railways during 2017–18, as per the estimates submitted by TGTRANSCO. However, despite extensive correspondence between Railways, TGTRANSCO, and TGDISCOMs, no substantial progress has been made in	a) The Deemed Distribution Licensee status for Indian Railways was withheld by Hon'ble APTEL in its judgment. As per the provisions in the Electricity Act 2003 under section 42(2) & 42(4) any Open Access consumer is required to pay CSS& AS determined by the Hon'ble Commission in its Tariff orders including Indian Railways. b & c) TGDISCOMs are processing the request of Railways as per Standard Operating Procedures of TGDISCOMs.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	providing ABT meters compatible with Open Access in accordance with the latest regulations and guidelines in force. • As per Section 39, 2 (d) Indian Electricity Act-2003, STU to provide non-discriminatory open access to its transmission system for use by all the entities eligible as per the Regulations in force. • High traction tariff for Railways, forcing Railways to explore the other alternatives to avail traction power through bilateral arrangements under Open Access to reduce the cost of energy billing. Reasonable, competitive and low traction tariff for Railways on par with the other open access states is requested to retain bulk consumer and prompt payer of electricity bills.	d) The replies to this have already been answered above
13.	Railways prayed: a) Railway traction tariff shall be on par with open access rates (average open access rate for Railways is Rs. 5.49/unit) in other states of Railways. Reasonable traction tariff for Railways may be considered to retain a bulk consumer and prompt payer like Railways. Reasonable traction tariff on par with the open access rates will further give impetus to Railway electrification projects and traction system upgradation from 1x25 kV system to 2x25 kV system over the Railway network in the state of Telangana. Railway Electrification is	The replies to this have already been answered above.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	environment friendly, energy efficient and reduces carbon footprint, which further reduces the import burden of high-speed diesel. b) Existing high traction tariff for Railways has been affecting the ongoing Railway Electrification projects which are under progress in the state of Telangana. This will have a detrimental effect on the electrification projects and other upcoming infrastructure projects in the state of Telangana. c) In this circumstance, existing/proposed tariff by TG Discoms equivalent charges of Rs 7.03 /kVAh (with average load factor 35%) is high and unreasonable. Higher tariff compared to “open access” and burdening the bulk consumer like Railways.	
14.	Conclusion: Railway traction provides base load, maintains high power factor and save imported fissile fuel, apart from speedy, energy efficient and environmentally friendly public transport. Encouragement for new electrified sections for development of infrastructure in the state of Telangana and also act as growth engine for the economy of country largely. Keeping the above in view, Hon’ble commission is requested to consider and it is prayed that, a) The existing high traction tariff under category HT-V (A) Railway traction is to be reduced for the above-mentioned reasons as per the	The replies to this have already been answered above.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	provisons of National Tariff Policy, to encourage electrification projects in Telangana state. b) Railway Traction Tariff in line with Hyderabad Metro Rail, may be considered to avoid disparity, discrimination and injustice between the two public transport systems. c) Railway Traction tariff reduction may be considered by exempting Railways from the burden of cross subsidy surcharge by virtue of provisions contained in the National Tariff Policy issued by Ministry of Power on 28th January -2016. d) To give impetus to electrification of Railway network, it is requested to consider the reasonable rebate/ incentives for prompt payment of monthly energy bills. e) Blocking of leading kVArh to be considered for Railways to avoid financial burden on the Railways in view of reasons/clarifications mentioned at P.No.11. f) In the circumstances explained above, the Hon'ble Commission is humbly requested to kindly consider the objections submitted by the Railways and to review, rationalize, and suitably revise the existing tariff schedule and policies governing Railway Traction, keeping in view the Railways' status as a bulk consumer and a prompt payer of energy charges.	

5. Response to Mr. Venkat N.K.K, Independent Member- CGRF (Rural)- (TGSPDCL), General Secretary - Telangana State Solar Open Access DEVELOPERS' Association (TSOADA), Member- Energy Committee- Federation of Chamber of Commerce of Telangana (FTCCI)

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	Cross Subsidy Surcharge: - Objection to Proposed Increase in Cross Subsidy Surcharge (CSS):- The proposal of TGSPDCL to increase the Cross Subsidy Surcharge (CSS) by more than 11% — for example, for 33kV (HT-1A) consumers from ₹1.56 per unit to ₹1.73 per unit — is contrary to the express mandate of the Electricity Act, 2003 and the statutory policies issued thereunder. In terms of Section 42(2) of the Electricity Act, 2003, read with Clause 8.3 of the National Tariff Policy, 2016 (as amended in 2023) and Para 5.4.7 of the National Electricity Policy, 2005, both cross subsidy and cross subsidy surcharge are required to be progressively reduced so as to move towards cost-reflective tariffs. ……	TGDISCOMs submits that the Cross Subsidy Surcharge (CSS) for FY 2026-27 has been calculated in line with the National Tariff Policy, 2016, considering the existing consumer mix, cost of supply and applicable tariffs. The proposed CSS is restricted within ±20% of the Average Billing Rate (ABR) for the concerned consumer category, as prescribed under the policy. TGDISCOMs remains committed to the progressive reduction of cross subsidy and CSS in the system and will continue to do so.
2.	Exemption from lead un-block for open access solar power plants: Solar Open Access Generators were given HT service with minimum 70 KVA load as against Solar Projects selling power to TGSPDCL, who are netted off with their gross generation. This is discriminatory treatment of Open	The Tariff order mandates uniform application of the approved metering and billing provisions to all applicable consumers connected to the distribution system, including grid-connected solar generating stations, since drawal and injection of energy and reactive power impact the distribution network.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	Access Generators, as compared to similarly placed solar generators, it is expressly prohibited under the Electricity Act, 2003. Open Access is a statutory right and cannot be frustrated through arbitrary conditions, higher charges, or operational restrictions. We also wish to bring on record that solar power plants operate as generators and not as consumers, particularly during night hours or during periods of zero generation. Technical Position 1) Generator-mode reactive behaviour: During night hours or under low irradiance conditions, transformers and HT lines/cables inherently operate in a capacitive mode, causing export of capacitive kVArh (lead) to the grid even when active power export is zero. This is a natural characteristic of grid-connected generating stations and not consumer load behaviour. 2) Recorded MD during non-generation: We have only about 5–8 kW auxiliary consumption during non-generation hours; however, the maximum demand recorded is 18–30 kVA, solely due to the transformer no-load losses and the capacitive reactive characteristics of the 33 kV line.	Uncontrolled injection of leading reactive power, particularly during low-load or non-generation periods, adversely affects voltage profile, system stability, and network operations. Accordingly, proper measurement and accounting of reactive energy, including leading kVARh, is essential for maintaining grid discipline and efficient system operation, as recognised in the Tariff Order. It is the responsibility of the consumer to regulate and control such reactive power by absorbing it from the grid, whenever required rather than injecting the same. The directions of the Hon'ble Commission regarding **unblocking of metering of lead KVARh** have been issued in the **Tariff Order after due regulatory scrutiny** and are intended to ensure **accurate measurement of energy exchange and grid discipline**, in line with the provisions of the Electricity Act, 2003 and the applicable Regulations. It is a fact that solar power plants draw power from the grid during night hours not for start-up activities, but exclusively for lighting loads, and in that context, the solar power plants are treated as consumers. Hence, it does not follow that the **technical directions issued by the Hon'ble Commission in the Tariff Order are inapplicable** to such plants. The Tariff Order does not provide any explicit exemption to generating stations, including solar plants, from the applicability of metering provisions relating to reactive energy.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	3) HT Agreement CMD requirement: Even though our actual auxiliary requirement is very low, we hold an HT agreement with TGSPDCL for 70kVA CMD, only to comply with the minimum kVA requirements specified by TGERC for allotment of an HT Service Connection Number. 4) Purpose of unblocking "kVArh Lead": The intention behind unblocking the leading reactive register is to discourage capacitive injection/drawl by consumers. However, solar panels neither draw or injects capacitive reactive power. 5) Compliance during actual generation: During daytime generation, solar plants maintain power factor well within the limits specified by DISCOM, CEA regulations and the State Grid Code. Our Request In view of the above factual and technical circumstances, we humbly request that Solar Power Plants may kindly be exempted from the "kVArh Lead Unblock" provision as leading reactive energy export is natural, unavoidable and inherent to generator-type systems, and not attributable to consumer-side behaviour.	It is submitted that **reactive power management is a critical element of grid operation**, irrespective of whether the entity is a consumer or a generator. Injection of leading reactive power by solar plants, particularly during low load and non-generation conditions, has a **direct impact on voltage profile, system stability and power quality** of the distribution network. The directions for unblocking of lead KVARh metering have been issued to ensure that **reactive energy is properly recorded and accounted for**, so as to discourage excessive injection of leading reactive power and to promote efficient grid operation. These directions are **technical and operational in nature** and are not linked solely to the consumer category or end-use of electricity. Promotion of renewable energy does not imply exemption from **grid discipline, metering requirements or operational controls**. Renewable generators are equally required to comply with the regulatory framework governing system operation. Whenever the plant is connected to the distribution system whether during generation or non-generation hours it becomes a **grid-interfacing entity** whose reactive power injection or absorption directly affects **voltage profile, network loading and system stability** and therefore cannot seek blanket exemption from metering provisions merely on the basis of its generating status.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	This selective application only to Open access generators is hostile, discriminatory, arbitrary and contrary to Sections 38(2)(d), 39(2)(d), 40(c) and 42 of the Electricity Act, 2003 which mandate non-discriminatory open access.	During non-generation hours, when the solar generator draws power from the grid for auxiliary consumption, lighting, control systems, inverters and grid-support operations, such drawal constitutes **consumption of electricity from the distribution system**. For such periods, the solar generator **squarely falls within the scope of an HT consumer** under the applicable Tariff Order.
3.	Lead Unblock- Exemption to consumers with less than 1 MW CMD & Deferment to all other consumers till detailed study:- Clause 3.21.14 of the Retail Supply Tariff Order for FY 2025-26 dated 29.04.2025 states as under:"In the Tariff Order for FY 2024-25, the Commission directed the TGDISCOMs to carry out an impact assessment study on unblocking of kVArh, conduct comprehensive consumer awareness programmes across the State, and submit the study report to the Commission before the nexttariff filing." It is observed from Clause 3.21.15 that the TGDISCOMs have submitted the impact assessment study, wherein the issue of leading power factor has been addressed only in a summary manner, citing stress on the transmission and distribution network as the reason.	TGDISCOMs submit that reactive power, whether lagging or leading, results in an increase in current flow, thereby necessitating additional network capacity. The FOR observed that there is no difference between leading and lagging power factor in reduction of network capacity and increasing the energy and power losses. Uncontrolled injection of reactive power (leading VARs) can cause operational issues such as over-voltage conditions and inefficient utilization of network assets. For better grid discipline, lag plus lead billing system gives meaningful kVAh as static meters are envisaged the measurement of both leading and lagging reactive power.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	Our Submissions: It is respectfully submitted that: Lagging power factor: consumes reactive power (+kVAr)-> Reactive power is drawn from the grid by loads. Leading power factor: supplies reactive power (–kVAr) -> Reactive power is injected into the grid by loads. Thus, reactive power injected by one consumer is, in practice, absorbed by another consumer within the same distribution system. As a matter of fact, our Distribution networks (TGSPDCL & TGNDCL) are dominated by inductive loads due to widespread use of Induction motors, transformers, extension of 24 Hours supply toagricultural pump sets. In such scenarios supply of reactive power from certain consumers reduces the net reactive burden on the grid. The study conducted by TG DISCOMS did not to evaluate the current reactive powerrequirement of DISCOMs and that how DISCOMs will manage when such reactive power is not supplied by certainconsumers. In this context, it is pertinent to note that several distribution systems across various countries recognise and	Capacitors should remain in circuit as long as the load runs and must be cut-off as soon as the load is switched off. However, in the existing lead block billing system, the lead pf will be treated as unity. As a result, some of the consumers were keeping their capacitors in ON condition even when no load is connected to the system thereby maintaining leading PF i.e. on the pretext of maintaining unity pf, consumers were overcompensating. Such condition not only injects reactive power into the system but also is detrimental to the healthiness of the Grid for various reasons such as the utilization of transformer capacity (KVA) is blocked due to increase in current, line loss gets increased due to increase in current, over-voltage problem occurs in secondary side of transformer etc. This is not only harmful to grid but also to the consumer's equipment which is connected to system. Hence, unblocking of RkVAh lead is warranted for all HT services to use electricity at Unity PF. The APERC has issued order for unblocking of KVARh lead for the purpose of computation of KVAh and is being implemented by APDISCOMs since 2019.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	compensate for reactive power services as a grid-support function. No doubt the ideal scenario for the Utilities shall be that every consumer operating in the unity power factor. But this is practically not possible due to presence of millions of agricultural pump sets and lack of monitoring mechanisms of such pump sets. ……. Request In view of the above, it is humbly prayed that the Hon'ble Commission may be pleased to: 1. To Constitute an expert committee comprising representatives from industry associations, reputed technical institutions (such as IITs/NITs/JNTU),generators, and other relevant stakeholders, as deemed appropriate by the Commission. 2. To Undertake a detailed study of the techno-commercial implications of unblocking leading kVArh and its impact on consumers and the distribution system; and	Further, MSERC in its order dt. 02.01.2019 observed that "RkVAh lead" needs to be considered in computation of PF/kVAh and the consumers are to install required equipment or make necessary changes in their processes so as to maintain PF within the prescribed limits. The Hon'ble TGERC after due public consultation process has approved for unblocking of KVARh Lead. Hence, considering the report of Apex body like FoR, other state Regulatory Commissions i.e. APERC & MSERC orders on unblocking of KVARh Lead in terms of the safety of GRID, it is not necessary for formation of committee for studying the impact of KVARh lead as the behaviour of the KVARh lead is same on the Grid. The DISCOMs have already addressed the grievances of consumers having issues with reactive power through field level interactions. However, the DISCOMs are open to create awareness to the needy consumers on controlling the reactive power.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	3. To Direct the DISCOMs to undertake widespread consumer awareness programmes prior to implementation of any decision based on the recommendations of the said committee. 4. To direct DISCOMs to Rectify the excess billing done in the lead kvah unblock conditions till the final decision is taken in this regard.	

6. Response to Sri. Ramisetty Venkata Subba Rao

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1	1.1 ARR for FY 2026-27: The Subsidy Trap Issue 1.1.1: Zero-Tariff Hike and Section 65 Compliance TGNPDCL proposes to maintain tariffs unchanged despite facing a revenue deficit of ₹12,521 crore. This proposition is fiscally irresponsible unless accompanied by an irrevocable, unconditional commitment from the State Government to bridge the entire gap through budget allocation.	TGDISCOMs humbly request Government of Telangana to fulfill the requested revenue gap. TGDISCOMs shall abide by the directions of the Hon'ble Commission with regard to revenue gap.
2	Issue 1.1.2: Power Purchase Cost and Merit Order Dispatch (MOD) Discipline Problem Statement: Power purchase costs are projected at ₹16,075 crore (~70% of total ARR). TGNPDCL exhibits heavy dependence on state thermal generators, even during off-peak hours when alternative, cheaper power sources (GDAM, power exchanges) are available. Regulatory Framework: The National Tariff Policy and TGERC regulations mandate that distribution companies follow least-cost merit order dispatch, prioritizing:	We would like to notify that TGNPDCL in their filings have submitted that the power is procured from multiple sources including State thermal, CGS, NCE, Hydel, Solar. Further, low cost generating sources such as Solar and other Renewable Energy are given must-run status only after the dispatch of which the thermal generators are dispatched based on the power requirement. Even for the thermal generators, Merit Order Dispatch principle is adopted by SLDC following National Tariff Policy & Grid code to ensure that the low cost generators are dispatched first in order to optimize the overall power procurement costs.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	1. Solar and renewable energy (lowest marginal cost: ₹2.50–3.50/kWh) 2. Green Day Ahead Market (GDAM) power (~₹4.00–4.50/kWh) 3. Power exchange purchases (~₹3.50–5.00/kWh) 4. Thermal generation (highest cost: ₹5.50–6.50/kWh) Evidence of Non-Compliance: The filing provides no transparent block-wise MOD data. Specifically, absent: 1. Hourly/15-minute dispatch records showing least-cost procurement 2. Evidence that renewable energy purchases were maximized 3. Documentation of GDAM and power exchange participation 4. Justification for reliance on costlier thermal generators during low-demand periods The Commission shall direct TGNPDCL to:	In addition, TGDISCOMs procure power from short-term sources at times when the market purchase price becomes more economical than the Variable cost of curtain generators in order to reduce overall power procurement price. All the data pertaining to Power purchase from different generation sources and Power exchanges, compliance on Merit Order Dispatch at hourly block level, must run dispatch from Renewable Sources has been furnished to the hon'ble commission for their perusal. We would like to reiterate that TGDISCOMs have ensured compliance to low cost dispatch principle in estimation of the power purchase cost and no thermal procurement has been considered in the projection in the presence of a cheaper alternative.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	1. Submit complete transparency data: o Block-wise (15-minute interval) merit order dispatch for entire FY 2026-27 o Comparative analysis of procurement costs by source (renewable, GDAM, exchange, thermal) o Evidence of renewable energy curtailment with quantum and justification 2. Demonstrate least-cost compliance: o For every thermal dispatch instance, provide justification showing no cheaper renewable/GDAM/exchange power was available o Benchmark realized power purchase costs against comparable DISCOMs and efficient frontier 3. Impose cost discipline: o Disallow any thermal power procurement where cheaper alternatives were available but not utilized	

<table>
<tr><th>S.No.</th><th>Summary of Objections / Suggestions</th><th>Response of the Licensee</th></tr>
<tr><td></td><td>o Reduce allowed power purchase cost if dispatch violates least-cost principles</td><td></td></tr>
<tr><td>3</td><td>1.3 Deviations from FY 2025-26 Tariff Order Directives
The following table documents departures from explicit directives in the FY 2025-26 Tariff Order:
<table><tr><th>Directive</th><th>Requirement</th><th>TGNPDCL Compliance</th><th>Impact</th></tr><tr><td>Timely Filing</td><td>File ARR/True-Up by 30 November 2025</td><td>Filed January 2026 (2 months late)</td><td>Carrying cost accrued; not recovered by deadline; burden shifted to consumers</td></tr><tr><td>Agricultural DTR Metering</td><td>100% metering mandated for agricultural feeders</td><td>Compliance <40%; majority remain unmetered</td><td>Unmetered consumption masked as "free agriculture"; inflates AT&C losses</td></tr><tr><td>Subsidy Payment</td><td>Advance payment from State Budget before 1 April</td><td>₹20,000+ crore cumulative arrears</td><td>Financial stress; irregular cash flow; unplanned cost deferrals</td></tr><tr><td>Cost of Supply Alignment</td><td>Tariffs converge toward ACS±20% range</td><td>Remain heavily cross-subsidized; no convergence progress</td><td>Industrial/commercial consumers subsidize agriculture; inequitable distribution</td></tr></table>Regulatory Implication: Repeated non-compliance with tariff order directives undermines regulatory credibility. Commission shall strengthen monitoring and impose consequences (disallowance of costs, penalty adjustments) for future non-compliance.</td><td>1) TGDISCOMs ensured timely filings in line with Hon’ble commission’s requirements.
2) Hon’ble commission in FY 2025-26 tariff order directed DISCOM’s to submit an action plan for achieving 100% Agricultural DTR metering within 2 months. In this regard, it is submitted that under RDSS, Mop/GoI has laid emphasis on Segregation of Agriculture feeders through which all the agriculture loads will be segregated on to separate feeders. All the feeders in TGNPDCL erstwhile TGNPDCL were already equipped with feeder meters (DLMS). Now that under RDSS all feeder meters are to be meters with communicable & AMI/AMR meters. If we take up segregation of Agriculture feeder under RDSS we can assess the agriculture consumption with feeder meter data itself without fixing meters to agriculture DTRs.
3) TGDISCOMs are receiving subsidy payments from the State Government on time, including advance payments, and are in continuous coordination for settlement of legacy dues to reduce financial stress.
4) TGDISCOMs submit that tariffs are being determined strictly in</td></tr>
</table>

<table>
<tr><th>S.No.</th><th>Summary of Objections / Suggestions</th><th>Response of the Licensee</th></tr>
<tr><td></td><td></td><td>accordance with the directions of the Hon’ble Commission. The TGDISCOMs are making sustained efforts to move towards cost-reflective tariffs and remain committed to the progressive reduction of cross-subsidy in the system.</td></tr>
<tr><td>4</td><td>SECTION 2: PERFORMANCE ASSESSMENT AND INTEGRATED RATING IMPLICATIONS
2.1 14th Integrated Rating and Ranking Report (January 2026): The independent 14th Integrated Rating Report confirms that TGNPDCL is classified in the C/C− band, the lowest performance tier among all state DISCOMs. This rating reflects:
<table><tr><th>Performance Metric</th><th>TGNPDCL Status</th><th>All-India Average</th><th>Top Performer</th></tr><tr><td>AT&C Losses (%)</td><td>15–20%</td><td>~15%</td><td><10%</td></tr><tr><td>Collection Efficiency (%)</td><td>Low (rural/agri segment)</td><td>~90%</td><td>>95%</td></tr><tr><td>Financial Health Index</td><td>Below acceptable</td><td>Acceptable</td><td>Excellent</td></tr><tr><td>System Reliability (SAIFI)</td><td>High interruptions</td><td>Lower</td><td>Best-in-class</td></tr></table></td><td>TGNPDCL has implemented a number of measures for improving operational and commercial efficiency.

TGNPDCL is implementing Feeder Outage Management in a phased manner. The desired outcomes of higher reliability will be achieved accordingly. Also, it may be noted that the Integrated Rating Report places a higher weightage of 75% to financial indices resulting in a lower ranking. However, it is not right to classify operational performance, including system reliability, under the same lens.

For addressing the issues related to financial sustenance, it may be noted that GoTG has issued a GO on the formation of third Discom.

TGDISCOMs are implementing the steps needed for complying with the GO. These are expected to improve the financial sustenance of NPDCL.</td></tr>
<tr><td>5</td><td>2.2 Regulatory Concern: Cost Assignment and Natural Justice</td><td>TGDISCOMs submits that tariffs are determined as per the directions of the Hon’ble Commission. The Integrated Rating is a performance assessment tool and cannot be the sole basis for disallowing recovery of actual costs incurred.</td></tr>
</table>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	Principle: Tariffs and cost allocations should reflect the principle of cost-reflectivity: consumers pay for costs they cause; no consumer should be charged for inefficiencies they do not cause. Problem: TGNPDCL's C/C− rating confirms systemic inefficiencies. Assessing consumers for these inefficiencies violates: 1. Cost-Reflectivity: Consumers did not cause TGNPDCL's AT&C losses, billing delays, or poor financial management 2. Natural Justice: Independent third-party evaluation confirms inefficiency; forcing consumers to fund corrective measures is inequitable 3. Regulatory Principle: Licensees should bear consequences of their performance; inefficiency should not be rewarded with cost recovery Relief Sought: 1. Commission shall not allow tariff recovery of costs directly attributable to identified inefficiencies in the Integrated Rating Report 2. Commission shall mandate corrective action plans with measurable targets and timelines for AT&C loss reduction, billing improvements, and financial stabilization	The DISCOM is continuously taking steps to improve operational efficiency, including reduction of AT&C losses and improvement in billing and collection efficiency. It must be noted that the Hon'ble TGERC has come up with a comprehensive mechanism of reward and penalty under the MYT regulations (Regulation 2 of 2023) and TGDISCOMs are filing duly adhering to the provisions of MYT regulation. Disallowance of the costs merely on the basis of a rating report is unwarranted and is against the principles of Regulatory Jurisprudence.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	3. Commission shall condition tariff increases on demonstrated progress toward improved Integrated Rating	
6	SECTION 3: DEEP-DIVE ANALYSIS BY MAJOR COST HEAD 3.1 Power Purchase Cost – Least-Cost Dispatch and MOD Compliance Issue: Power purchase cost (₹16,075 crore, ~70% of ARR) relies heavily on state thermal generators. TGNPDCL provides no evidence that least-cost merit order dispatch was followed. Analysis: □ No block-wise MOD data provided in filing □ No justification for costlier thermal dispatch when cheaper GDAM/exchange power available □ No renewable energy curtailment detail (quantum, reasons) □ Potential cost inflation: Estimated ₹500–800 crore annually from uneconomic dispatch Relief Sought: 1. Direct TGNPDCL to submit complete block-wise (15-minute interval) MOD data	We would like to notify that TGNPDCL in their filings have submitted that the power is procured from multiple sources including State thermal, CGS, NCE, Hydel, Solar. Further, low cost generating sources such as Solar and other Renewable Energy are given must-run status only after the dispatch of which the thermal generators are dispatched based on the power requirement. Even for the thermal generators, Merit Order Dispatch principle is adopted by SLDC following National Tariff Policy & Grid code to ensure that the low cost generators are dispatched first in order to optimize the overall power procurement costs. In addition, TGDISCOMs procure power from short-term sources at times when the market purchase price becomes more economical than the Variable cost of curtain generators in order to reduce overall power procurement price. All the data pertaining to Power purchase from different generation sources and Power exchanges, compliance on Merit Order Dispatch at hourly block level, must run dispatch from Renewable Sources has been furnished to the hon'ble commission for their perusal.

<table>
<tr><th>S.No.</th><th>Summary of Objections / Suggestions</th><th>Response of the Licensee</th></tr>
<tr><td></td><td>2. Require demonstration of least-cost dispatch across all fuel sources
3. Disallow avoidable power purchase costs where dispatch violates regulatory principles</td><td>We would like to reiterate that TGDISCOMs have ensured compliance to low cost dispatch principle in estimation of the power purchase cost and no thermal procurement has been considered in the projection in the presence of a cheaper alternative.</td></tr>
<tr><td>7</td><td>3.2 Capital Expenditure, Capitalization, and Cost of Capital
Critical Issue: Historical execution shows severe shortfall between approved and actual capex.
FY 2023-24 Performance (Audited):
<table><tr><th>Parameter</th><th>Approved (₹ Cr)</th><th>Actual (₹ Cr)</th><th>Shortfall (%)</th></tr><tr><td>Capital Expenditure</td><td>2,104</td><td>723</td><td>–65%</td></tr><tr><td>Capitalization</td><td>1,794</td><td>552</td><td>–69%</td></tr></table>Consumer Impact: Consumers paid interest and depreciation on ₹2,104 crore approved capex, even though only ₹723 crore of assets were actually created. Excess cost recovery estimated at ₹150–200 crore annually.
Relief Sought:
1. Reconcile approved vs. actual capex and capitalization for all preceding years
2. True-down RoCE and depreciation on assets not commissioned or inadequately capitalized
3. Link future RoCE allowance to actual capitalization only, not projected capex</td><td>TGNPDCL submits that the objection is misconceived and based on an incorrect assumption that approval of capex automatically results in consumer recovery of interest/depreciation on the approved amount. Under the MYT framework, the Commission’s capex approval is an ex-ante ceiling/plan, whereas interest, depreciation and return are admissible only on actual capitalisation of assets put to use, as admitted by the Hon’ble Commission through prudence check and true-up. Therefore, the objector’s claim that consumers paid more against approved capex over actual spent is factually and regulatorily incorrect—unspent capex does not enter the regulatory asset base and cannot be recovered through ARR.
The table cited by the objector merely indicates phasing/implementation variance, which due to RoW constraints, statutory clearances, tender timelines, supply-chain delays and site readiness. Such under-execution does not cause consumer burden; rather, it results in lower capitalisation, and consequently lower admissible depreciation/return/interest for that year. In any case, the true-up process already provides for reconciliation of approved vs actual and admission strictly on the basis of audited accounts and verifiable capitalization</td></tr>
</table>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	4. Require specific, verifiable project timelines with non-achievement penalties	that requires additional documentation (scheme-wise status, PCC/FCC, energisation details),
8	3.3 Depreciation Recovery and Asset Replacement Issue: TGNPDCL recovers full depreciation from consumers via tariff, but many life expired assets remain unreplaced. Problem Cycle: 1. Utility recovers depreciation from consumers (intended for asset replacement) 2. Instead of replacing life-expired assets, utility continues operating them 3. Old assets fail frequently, requiring expensive repairs 4. Repair cycle becomes uneconomical (repair >replacement) 5. System reliability deteriorates; interruption costs borne by consumers Relief Sought: 1. Direct TGNPDCL to submit asset-age profile with age distribution of critical assets (transformers, conductors, poles, switchgear) 2. Require scrap-and-replace policy for life-expired assets using salvage value to offset replacement cost	TGNPDCL submits that the objector is presuming that depreciation recovered through tariff is a ring-fenced “replacement fund” that must translate into one-to-one asset replacement within the same period. Under the regulatory framework, depreciation is a tariff building block reflecting the consumption of asset life and supporting overall capital recovery; asset replacement and modernization are undertaken through the capex planning and investment approval process, guided by reliability, safety, and network requirements—not merely by the age of an asset. Many assets continue to operate safely beyond indicative life due to maintenance, loading conditions, and refurbishment, while others require earlier replacement. Therefore, the objector’s generalized claim that “life-expired assets are not replaced” cannot be substantiated. TGNPDCL further submits that R&M expenditure cannot be equated to “inefficient repair cycle” by assumption. Preventive and breakdown maintenance is an essential and unavoidable activity for a large distribution network and is required to maintain supply reliability, safety, and statutory compliance. The objector’s request to disallow 50% of R&M as a penalty is without any regulatory basis, is punitive in nature, and would be contrary to prudence principles—since disallowance must be based on specific inadmissibility or demonstrated imprudence, not on a generalized narrative.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	3. Implement phased mandatory replacement: o FY 2026-27: 25% of annual failure batch (1,250 units) o FY 2027-28: 50% of batch (2,500 units) o FY 2028-29: 75% of batch (3,750 units) o FY 2029-30 onwards: 100% scrap-and-replace 4. Disallow 50% of claimed repair & maintenance expenses (estimated ₹45 crore) as penalty for continuing inefficient repair cycle	Accordingly, TGNPDCL requests the Hon'ble Commission to reject the prayer on penal disallowance of R&M stating inefficient repair cycle.
9	3.4 Operations & Maintenance and Employee Costs Issue: Employee costs proposed at 12–15% increase. TGNPDCL has 2,000+ vacant posts (linemen, assistant engineers), yet budgets as if all filled. Problem: While sanctioned strength remains unfilled, cost is budgeted at full level, disadvantaging consumers through: □ Inflated employee cost allowances □ Reduced field service quality (vacancies not filled) □ Increased electrical safety incidents Relief Sought: 1. Allow employee costs only for actual staff on roll, not sanctioned/unfilled positions 2. Treat vacancy savings as consumer benefit	The Hon'ble Commission has approved O&M expenses by applying escalation on the average of the true-up expenses for the immediate preceding control period, and this if further escalated for 3 years as per clause No. 81 of Regulation No. 2 of 2023. However, the approved amount so derived is lower than the actual expenditure incurred during FY 2023-24. O&M cost escalation is based on CPI/WPI indices in accordance with Regulation 81.3 based on actuals for FY 2024-25. This revision is primarily on account of actual employee cost, repairs & maintenance activities, and administrative expenses, projected based on CPI/WPI. The Hon'ble Commission has approved Employee cost for FY 2024-25 by applying escalation on the average of the true-up expenses for the immediate preceding control period, and this if further escalated for 3 years as per clause No. 81 of Regulation No. 2 of 2023. However, the approved amount so derived is lower than the actual expenditure incurred during FY 2023-24.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	3. Cap A&G expenses at efficient benchmarks per independent DISCOM comparison 4. Disallow avoidable legal and consultancy expenditure with detailed justification	Further, the methodology specified by the Commission does not cosider three aspects viz. (i) the impact of variation in number of employee's year on year, (ii) impact of Pay Revision (iii) impact of the yearly increments of the employees of the licensees.
10	3.5 AT&C Losses and Demand Forecasting Issue: TGNPDCL claims AT&C loss reduction to ~15%, but driven by inflated estimates of unmetered agricultural consumption rather than metered data. Tariff Order 2025-26 Directive: 100% agricultural DTR metering mandated. Actual compliance: NIL Consequence: Unmetered consumption masks actual commercial losses; loss figures lack credibility. Demand Forecast Problem: □ Projected growth: 8–9% □ Actual historical growth: 4–5% □ Risk: Stranded capacity charges if overestimation leads to excess PPAs Relief Sought: 1. Accept AT&C loss levels only to extent supported by feeder/DTR metering and energy-audit data	1. The Licensee submits that an independent study on the methodology for estimation of agricultural sales was earlier carried out by the Indian Statistical Institute (ISI). ISI recommended a stratified random sampling methodology for estimation of agricultural consumption, which has been adopted by the DISCOM. Accordingly, agricultural consumption and AT&C loss levels are being assessed based on the approved methodology. 2. Under the purview of Hon'ble commission. 3. Demand forecasting is done considering the factors such as – past growth rates, pending new connection applications, expected demand from agricultural category, economic outlook etc. The present regulatory framework has well defined adjustment mechanisms to address the concerns on variation in performance of all key parameters (including demand) 4.The matter of charging for 'Stranded Capacity Cost' arises in a scenario where the discoms contract power capacity to supply reliable and quality power to consumers, however the consumer avails power from other third-party sources, resulting in stranding of capacities.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	2. Mandate time-bound metering targets with quarterly compliance reporting and financial penalties for non-achievement 3. Require realistic demand forecasts with mid-term corrections and adjustment mechanisms 4. Ring-fence stranded-capacity costs to prevent consumer liability for forecasting errors	The methodology of charging open access consumers based on the stranded capacity has been well laid by Hon'ble TGERC. TGDISCOMs would like to reiterate here the fact that the question of charging consumers for stranded capacity due to forecasting errors does not arise.
11	SECTION 4: DEMAND-SIDE MANAGEMENT AND LOSS-REDUCTION OPPORTUNITIES TGNPDCL filings give insufficient weight to cost-effective Demand-Side Management (DSM) and technical loss-reduction measures that could significantly reduce ARR and subsidy requirements. **4.1** Capacitor Banks Installation (Reactive Power Management) Problem: Agricultural pumps (induction motors) operate at low power factor (0.70–0.75), drawing excess reactive current, causing voltage drops and line losses. Solution: Install LT capacitor banks (20–25 kVAR) at every agricultural distribution transformer.	**4.1** The assumption of a 0.70 power factor used in the objection is not consistent with actual field conditions observed in TGDISCOM networks. DISCOMs regularly carry out detailed studies to assess capacitor requirements, and based on these analyses, installation of power factor correction devices at the distribution transformer (DTR) level has not been found to be economically viable. ➢ All substations across TGNPDCL are having 2/1 MVAR capacitor banks in service, maintaining a system power factor (PF) of up to **0.95 or better at the substation level and upstream**. Further, most of the overloaded 11kV feeders are having 600kVAR line capacitor banks to support local reactive power requirements and **to improve voltage profile even at tail end.**

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Additionally, NPDCL has taken up bifurcation works of feeders with load above 150A. So far in FY25-26, 360 Nos of feeders are bifurcated.
As of March 2025, TGNPDCL has commissioned at 33/11Kv SS:

<table>
<tr><th>Sl.</th><th>Capacitor Bank Type</th><th>Nos.</th><th>Remarks</th></tr>
<tr><td>1</td><td rowspan="2">1/2 MVAR Capacitor Banks</td><td>1614</td><td>Commissioned so far</td></tr>
<tr><td>2</td><td>163</td><td>Proposed for FY 2026-27</td></tr>
</table>

600 KVAR Line Capacitor Banks on 11Kv lines:

<table>
<tr><th>Sl.</th><th>Capacitor Bank Type</th><th>Nos.</th><th>Remarks</th></tr>
<tr><td>1</td><td rowspan="2">600 KVAR Capacitor Banks</td><td>573</td><td>Commissioned so far</td></tr>
<tr><td>2</td><td></td><td>517 Nos. cells are available in stock, to meet future loads.</td></tr>
</table>

It is also to submit the LT capacitors, if connected directly to the DTR on LT side, they need to be disconnected during off load. But, the LT capacitor with the said amount of Rs. 15000/- can be provided only fixed capacitor bank. For auto switched the cost will be much higher. Instead

</td></tr>
</table>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	4.2 Energy Efficient Pump Replacement Program Problem: Farmers use inefficient pumps (20–25% efficiency); BEE 5-Star rated pumps (40–50% efficiency) deliver significant energy savings. Proposal: Replace inefficient 5 HP pumps with BEE 5-Star units at no cost to farmers (subsidized by DISCOM).	of providing LT capacitors at DTRs, NPDCL is pursuing with farmers for providing capacitors at their motors. ➢ If the capacitor is in service or not disconnected during off Agriculture period, it results in line losses and in over voltages in the system/Lines, which may result failure of capacitor cells which inturn may lead to failure of DTRs due to near faults. ➢ The TGNPDCL has also taken loss reduction measures such as encouraging consumer to have 2/3kVAR capacitors on their motor side and conducting regular inspections for meter exceptional etc. **4.2** The proposed measure is not feasible under the current regulations; as agricultural pump sets are not assets owned or maintained by DISCOMs. Further, agricultural consumption is not billed based on actual metered usage. Instead, it is calculated using normative parameters such as hours of operation per day, number of operating days per year, and the total connected load of agricultural consumers. Additionally, the projected energy savings of 20–25% appear overstated when compared to field-level data and practical operating conditions. Therefore, the cost–benefit analysis presented in the objection does not accurately reflect the realities of agricultural supply and billing practices. Further it is to inform that in TGNPDCL, New AGL services are releasing duly following the DSM measures in which ISI pumset is mandatory.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
		Your proposal will be studied for cost benefit analysis.
	4.3 Distribution Transformer De-loading and High Voltage Distribution System (HVDS) Problem: Overloaded distribution transformers (120%+ during peak season) exhibit high copper losses and frequent failures**.** Solution: De-load transformers and implement High Voltage Distribution System (HVDS), where low-load feeders are converted to 11 kV supply (instead of 415V), reducing current and losses. Technical Basis: Losses are proportional to current squared (I^2R losses). Voltage step-up reduces loss by factor of 100. **4.4** Scrap-and-Replace Program for Life-Expired Distribution Transformers Current Problem: TGNPDCL spends ₹13.5 crore annually repairing 5,000 failed. distribution transformers. This repair-and-replace cycle is economically unviable. Proposed Solution: Scrap transformers >15 years old with >25% no-load current; replace with new amorphous-core transformers (70% lower no-load losses).	**4.3** While the concept of converting low-load LT lines into 11 kV feeders under HVDS can theoretically reduce losses, the practical implementation requires very high capital expenditure. The scale of investment needed makes this intervention economically challenging for DISCOMs. Additionally, most substations in TGDISCOMs are already catering to the maximum number of feeders due to repeated bifurcations carried out to improve reliability and load management. Introducing further HVDS feeders would place additional strain on existing substations, limiting the feasibility of this proposal under current infrastructure conditions. **4.4** The assumption in the objection that repaired distribution transformers have an asset life of only six months is not accurate. In practice, the asset life after repair for TGDISCOMs is significantly higher, which makes repairs economically viable compared to outright replacement. Further, DISCOMs follow a structured process of scrutiny at the transformer level to determine whether a unit should be repaired or scrapped. This ensures that only transformers with irreparable damage are replaced, while those that can be restored to reliable service are repaired. This approach optimizes costs, extends asset life, and maintains system reliability without incurring unnecessary capital expenditure.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	Relief Sought: 1. Institutionalize structured DSM and loss-reduction programs with mandatory targets and timelines 2. Include performance-based monitoring with quarterly reporting to the Commission 3. Condition future cost-of-capital allowances on demonstrated DSM implementation and outcomes 4. Mandate immediate implementation of capacitor bank installation on all agricultural DTRs (highest ROI; lowest risk)	.
12	SECTION 5: AGRICULTURAL CONSUMPTION ASSESSMENT 5.1 Context and Concern Agricultural consumption accounts for more than 40% of total energy sales in TGNPDCL, with most services supplied free of charge through government subsidy. However: □ Majority of agricultural feeders remain unmetered (Tariff Order 2025-26 mandated 100% metering; actual compliance <40%)	The Licensee submits that an independent study on the methodology for estimation of agricultural sales has already been undertaken earlier by the Indian Statistical Institute (ISI). ISI had recommended a stratified random sampling methodology for estimation of agricultural consumption, which has been adopted by the DISCOM. Accordingly, agricultural consumption is being assessed based on the approved methodology. TGDISCOM shall abide by Hon'ble commission's in this regard.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	□ No robust energy audit conducted (relies on estimated/ assessed consumption) □ Significant methodology gaps in assessment procedures 5.3 Relief Sought The Commission is respectfully requested to: 1. Commission an independent, third-party study to accurately assess agricultural consumption in TGNPDCL's license area 2. Quantify potential energy and financial savings achievable through DSM interventions and efficiency measures in the agricultural sector 3. Base future tariff orders on verified agricultural consumption, not estimated figures lacking empirical foundation	
13	SECTION 6: STRATEGIC RECOMMENDATIONS **6.1** Direct Benefit Transfer (DBT) for Agriculture Concept: Meter all agricultural connections; transfer subsidy as cash directly to farmers. Farmers keep savings if they reduce consumption. **6.2** Solarization of Distribution Feeders Concept: Install small solar plants (1–2 MW) at substations serving agricultural/low income areas.	6.1 The decision for metering of Agricultural connections is currently under progress and the DISCOM shall consider the proposed scheme after detailed assessment and as per directions of the Hon'ble Commission. 6.2 Under the KUSUM-A scheme, Telangana is actively adding decentralized solar plants across various locations, with around 1,500 MW already sanctioned and power purchase agreements (PPAs) executed. This initiative directly benefits DISCOMs by reducing transmission and distribution losses, since the power is consumed close to the generation point.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	6.3 Automatic Fuel Surcharge Adjustment Implementation Concept: Monthly automatic pass-through of fuel cost variations (capped at 20–30 paise/kWh). **6.4** Management Accountability & Performance Incentives Proposal: Link TGNPDCL senior management salaries and performance bonuses to Integrated Rating improvements and DSM outcomes. □ No performance bonus if integrated rating remains C or below □ Bonus structure incentivizes actual operational improvements, not just accounting adjustments	Over time, this will contribute to better load management, reduced peak demand pressures, and improved financial sustainability for DISCOMs 6.3 DISCOMs shall abide by directions of Hon'ble commission in this matter. 6.4 The proposed linkage of senior management salaries and bonuses to Integrated Rating and DSM outcomes is not considered appropriate, as these parameters are influenced by multiple factors
14	SECTION 7: FORMAL RELIEF SOUGHT FROM THE COMMISSION In view of the comprehensive analysis and evidence presented above, the following specific reliefs are respectfully prayed for: 7.1 Section 65 Compliance and Subsidy Assurance 7.2 Disallow Delay-Related Carrying Costs 7.3 Disallow Carrying Cost on Delayed Fuel Surcharge Adjustment 7.4 Power Purchase Cost Rationalization 7.5 Correct Capital Expenditure, RoCE, and Depreciation	The replies to this have already been answered above.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	7.6 Rationalize Operations & Maintenance and Employee Costs 7.7 Tighten Loss-Reduction and Demand-Forecast Conditions 7.8 Institutionalize Demand-Side Management Programs 7.9 Commission Independent Agricultural Consumption Study 7.10 Mandatory DTR Scrap-and-Replace Program 7.11 Mandatory Fuel Surcharge Adjustment Compliance for FY 2025-26 Onwards 7.12 Link Management Performance Incentives to Integrated Rating	
15	Conclusion: The Commission's fundamental role is to ensure: 1. Only prudent and efficient costs allowed – not every expense recoverable from consumers or subsidies 2. Consumers not burdened for DISCOM delays – disallow carrying costs on late filings and unaudited claims 3. Regulatory discipline enforced – past directives on metering, subsidy timelines, and cost-of-supply convergence monitored with consequences	TGDISCOMs have given the relevant responses to the queries/ objections raised by the objector clearly outlining the performance of the discoms and addressing the issues raised by the objector. Hence TGDISCOMs, pray that the Hon'ble Commission may consider the filings of TGDISCOMs and may pass orders accordingly.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	4. High-return DSM mandated – DISCOM cannot ignore ₹2,400+ crore annual savings opportunities 5. Management accountability – incentives aligned with performance rating and operational outcomes Charging consumers for inefficiencies independently verified by external evaluators contradicts cost-reflectivity principles and violates natural justice. Respectfully Requested Relief The Commission is respectfully requested to: 1. Reject carrying cost on delayed filings and unaudited True-Up components 2. Withhold ARR approval until State Government provides irrevocable, bank guaranteed subsidy commitment 3. Impose time-bound metering, DSM, and loss-reduction conditions with quarterly monitoring and non-achievement penalties 4. Disallow inefficient repair-cycle costs; mandate scrap-and-replace for life expired transformers 5. Link management incentives to integrated rating improvements and DSM outcomes 6. Commission independent agricultural consumption study to verify figures used in tariff calculations	

7. Response to Sri. M. Thimma Reddy, Convenor, People's Monitoring Group on Electricity Regulation

<table>
<tr><th>S.No.</th><th>Summary of Objections / Suggestions</th><th>Response of the Licensee</th></tr>
<tr><td>1.</td><td>

Table 1: Electricity Sales growth (MU)

Year	SPDCL	NPDCL	Total	Growth (%)
2023-24	53,325	21,064	74,389	---
2024-25	56,183	22,043	78,226	5.16
2025-26	57,089	23,741	80,830	3.33
2026-27	63,753	26,371	90,124	11.50

TGDISCOMs have claimed to have applied category wise CAGR trend during the last 5 years, 4 years, 3 years, 2 years, 1 year over the previous year to arrive at energy requirement during FY2026-27. But there was no proper justification for using the particular CAGR in the case of different consumer categories. In fact in many cases, they have used 'manual growth rates'. The final power consumption/sales figures arrived by TGDISCOMs for FY 2026-27 do not seem to have any relation to the past experiences. As the above table shows during the FY 2024-25 electricity consumption increased by 5.16% and during the FY 2025-26 electricity consumption increased by 3.33%. But during the ensuing FY 2026-27 electricity consumption is estimated to increase by 11.50%. This is two times the consumption growth rate recorded during FY 2024-25 and three times the consumption growth rate

</td><td>

The lower electricity consumption recorded during H1 of FY 2025-26, primarily due to an extended and intensive monsoon period, has resulted in a suppressed baseline for FY 2026. Accordingly, TGDISCOMs have adopted the CAGR based on FY 2024-25 consumption levels for projecting sales for FY 2026-27. When growth is calculated with respect to the lower consumption of FY 2025–26, the resulting figure appears higher at 11.50%. However, when benchmarked against FY 2024-25 (an operationally normal year), the effective growth rate is 7.3%, which is more realistic and consistent with historical demand patterns.

The objector considered growth only up to FY 2023-24. If we extend this analysis by two additional years, the following growth rates can be seen

Year	SP	NP	State	Growth rate
FY 2021-22	42,578	18,642	61,220	-
FY 2022-23	47,551	19,250	66,801	9.12%
FY 2023-24	53,379	21,064	74,443	11.44%
FY 2024-25	56,183	22,043	78,226	5.08%
FY 2025-26	57,089	23,741	80,830	3.33%
FY 2026-27	63,753	26,371	90,124	7.34% (wrt FY 25)

</td></tr>
</table>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	recorded during FY 2025-26. Obviously, electricity consumption estimated to take place during FY 2026-27 is overestimated. The same needs to be revised downwards.	In this context, the projected FY 2026–27 growth rate of 7.3% remains well within the normal range and aligns with past consumption behavior. Additionally, it is important to note that the PM e-Drive initiative is expected to contribute to incremental energy demand.
2.	During the FY 2026-27 agriculture services are estimated to consume 11,962 MU accounting for 39.79% of energy requirement in the case of TGNPDCL and 15,428 MU accounting for 21.45% of energy requirement in the case of TGSPDCL. TGDISCOMs have claimed to have projected this consumption by agriculture services as per connected load. They have not mentioned whether the Commission approved this method. They have not explained how they have used this method. It all depends on assumptions they made on number of days and number of hours of operation of pump sets each day. An important limitation of this method is that some of the agriculture services released are not in operation. This leads to overestimation of power consumption by agriculture services. Besides this, solarization of agriculture pump sets under KUSUM taken up in the State will have its impact on this estimate.	This method has been adopted based on the Commission's approach in earlier ARR orders. As mentioned in the Commission's analysis: "*Commission's analysis & findings:* *3.4.39 The growth rates of actual agricultural contracted demands for the 4 years period before FY 2023-24 vis-à-vis the agricultural demand projected by TGDISCOMs for FY 2025-26 were analysed. LT-V Agricultural sales for FY 2025-26 were determined based on the demand claimed by TGDISCOMs in their petitions. For this purpose, an average operational period of 180 days per annum was considered for both the DISCOMs and an average daily operation time of 12 hours and 10 hours were considered for TGSPDCL and TGNPDCL respectively."* In current filings, TGDISCOMs have considered 12 hours of daily operation time and 180 operational days per year for both DISCOMs, since the nature of agricultural consumption is similar in both areas. Using the connected load indicated in the ARR filings, the sales figures have been calculated on the basis of 12 hours × 180 days. This method has been consistently used by the Commission for agricultural sales

<table>
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<tr><td></td><td></td><td>estimation. Therefore, TGDISCOMs have followed the same approach for estimating FY 2026-27 agricultural sales.

Load and Sales Projections for FY 2026-27

<table>
<tr><th>Particulars</th><th>NPDCL</th><th>SPDCL</th></tr>
<tr><td>Load Projections (hp)</td><td>7,421,344</td><td>8,205,026</td></tr>
<tr><td>Load Projections (MW)</td><td>5536</td><td>6121</td></tr>
<tr><td>Sales Projections (MU)
(Load in MW*12*180/10^3)</td><td>11958</td><td>15425</td></tr>
</table>

PM KUSUM

TGDISCOMs have already considered the generation from Solarization of Agricultural pumpsets under component-A & component-C of PM KUSUM and Roof top solarization under PM Surya Ghar under Power purchase estimation for FY 2026-27 as per the capacities expected to be commissioned in the said financial year.</td></tr>
<tr><td>3.</td><td>In the past the Commission has directed the TGDISCOMs to install meters on DTRs serving agriculture pump sets to estimate electricity consumption by these agriculture services. To this direction TGDISCOMs responded that as</td><td>The DISCOMs have proposed to undertake segregation of agricultural feeders under the RDSS program to enable better monitoring and accurate accounting of agricultural consumption subject to approval from GOI.</td></tr>
</table>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	feeders serving agriculture services are going to be segregated under RDSS metering these feeders will serve the purpose of estimating electricity consumption by these services. They have also mentioned that most of these feeders are already metered. TGDISCOMs are repeating this response over the last few years. They have also not given the timeline over which segregation of agriculture feeders will be completed. In the past TGDISCOMs had stated that they were not able to raise funds to take up metering DTRs connected to agriculture pump sets. But they are ready to take up smart meter programme which involves higher expenditure than metering agriculture DTRs. This indicates that TGDISCOMs have different priorities. In this background we request the Commission to direct TGDISCOMs to provide information on feeders that are exclusively serving agriculture services and mixed feeders; and provide time line over which mixed feeders will be segregated. In the case of mixed feeders which cannot be segregated meters shall be installed on DTRs connected to agriculture pump sets.	A Detailed Project Report (DPR) for strengthening of network in TGNPDCL area is proposed for a total projet cost of Rs 24862.26 Crs & submitted to the Principal Secretary, Energy department, Govt. of Telangana on 08.07.2025 under RDSS scheme out of which, Rs 2428 Crs were proposed for agricultural feerders segregation to enable better monitoring and accurate accounting of agricultural consumption. Further, approval is awaited from Governemnt. Number of pure Agricultural feeders – 611 Number of pure Mixed Rural feeders – 3735 Segregation of above mentioned Mixed Rural feeders will be taken up in RDSS scheme.

<table>
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<tr><td>4.</td><td>The two TGDISCOMs projected 3,877 MU electricity consumption by lift irrigation projects at 132 kV level during the ensuing financial year. The lift irrigation units linked to KLIP are not in full working condition due to damages to the barrages and pumping motors. Given these facts TGDISCOMs projections related to electricity consumption by these lift irrigation projects need to be re-examined. The TGDISCOMs also adopted different growth rates in estimating power consumption by lift irrigation projects at 11 kV and 33 kV level. While TGNPDCL adopted 2% growth TGSPDCL adopted 10% growth. At the same time, they did not provide any rationale for the growth rates adopted. They have adopted manual growth rate as “historical CAGR is erratic” They should be having information on ground level situation of lift irrigation schemes and the same should have been taken in to account.</td><td>The sales of SPDCL and NPDCL have been determined independently based on their respective historical actual sales and growth rates and hence the sales pattern of both DISCOMs needs to be looked at independently.

Few units linked to Kaleshwaram Lift Irrigation Project (KLIP) are non-functional and remain unchanged since FY 2024-25. There has been no additional reduction in operational usage thereafter. Hence, FY 2024-25 actuals already capture the impact of the same. KLIP is predominantly present in TGNPDCL territory which explains the relatively moderated growth ie., 2% NPDCL compared to 10% (for 11 kV and 33 kV) and 5% (for 132 kV) in SPDCL.

We would like to mention that historically LIS sales have been erratic (This is not specific to this year, Same is the case for previous years). Appropriate growth rate has been considered for projecting FY 2026-27 sales.</td></tr>
<tr><td>5.</td><td>Table 2: Power requirement 2026-27 (MU)
<table><tr><th>Particulars</th><th>SPDCL</th><th>NPDCL</th><th>Total</th></tr><tr><td>Total requirement</td><td>71,916</td><td>30,065</td><td>1,01,981</td></tr><tr><td>Total sales</td><td>63,753</td><td>26,371</td><td>90,124</td></tr><tr><td>Total (T&D) losses</td><td>8,163</td><td>3,694</td><td>11,857</td></tr><tr><td>Total losses (%)</td><td>11.35</td><td>12.29</td><td>11.63</td></tr></table></td><td></td></tr>
</table>

<table>
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<tr><td></td><td>
Table 3: T&D losses of TGDISCOMs
<table>
<tr><th>Year</th><th>Electricity procured (MU)</th><th>Electricity sales (MU)</th><th>T&D losses (MU)</th><th>T&D losses (%)</th></tr>
<tr><td>2024-25</td><td>88,964</td><td>78,226</td><td>10,738</td><td>12.07</td></tr>
<tr><td>2025-26</td><td>90,609</td><td>80,830</td><td>9,779</td><td>10.79</td></tr>
</table>

More than one tenth of power procured is going waste due to T&D losses. T&D loss levels recorded during the FY 2025-26 are higher than that projected as a part of the ARR of that FY. T&D loss levels projected by TGDISCOMs for FY 2026-27 are higher than the T&D loss levels recorded during the previous FY. These high T&D losses are taking place even after substantial investments in men and materials to strengthen and expand T&D network.

T&D losses shown by TGDISCOMs are also higher than that projected by the Commission in its Order on ARR of Retail Supply Business for 5th Control Period and Retail Supply Tariffs for FY 2024-25 of TGDISCOMs dated 28-10-2024. Lower T&D losses imply lower power requirement and lower power procurement costs.
</td><td>TGDISCOMs respectfully submit that voltage-wise losses across LT, 11 kV, 33 kV, and intra-state transmission levels are considered in accordance with the loss parameters approved by the Hon’ble Commission in the TGERC Order on ARR of the Retail Supply Business for the 5th Control Period dated 28.10.2024. These loss levels continue to be reasonable and prudent in view of prevailing system conditions.

Further, inter-state transmission losses have been considered based on the historically recorded average loss levels, duly factoring in the projected quantum of power procurement from inter-state generating sources.

We would like to reiterate that the losses for different voltage levels are considered as per the MYT Tariff order and the difference in overall T&D loss figures is due to the variation in the projected sales mix from the approved numbers in the MYT Order dated 28.10.2024</td></tr>
<tr><td>6.</td><td>The Commission through the Order on ARR of Retail Supply Business for 5th Control Period and Retail Supply</td><td>TGDISCOMs have projected the category wise sales by incrementing the past year sales for FY 2024-25 with the CAGR in previous years keeping</td></tr>
</table>

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<tr><th>S.No.</th><th>Summary of Objections / Suggestions</th><th>Response of the Licensee</th></tr>
<tr><td></td><td>Tariffs for FY 2024-25 of TGDISCOMs dated 28-10-2024 estimated total power requirement during FY 2026-27 to be 92,202 MU. At the same time TGDISCOMs arrived at 1,01,981 MU as their energy requirement during the same year. TGDISCOMs' estimate of energy requirement is 10% higher than that of the Commission.

From the above it is quite obvious that TGDISCOMs overestimated power requirement during the FY 2026-27. The same needs to be revised downwards reflecting ground realities.</td><td>into account the new load additions. Further, the Energy requirement of the state is estimated by grossing up the sales projections with the voltage wise losses approved in the TGERC Order on ARR of Retail supply business for 5th control period dated 28.10.2024.

It may be noted that TGDISCOMs have projected sales based on the latest available consumption trends and new load applications received. This will enable the projected sales to be aligned to the actual sales.</td></tr>
<tr><td>7.</td><td>Electricity availability:
Table 4: Power availability during FY 2026-27 (MU)<table><tr><th>Source</th><th>DISCOMs' 5th Control Period filings</th><th>TSERC Retail Supply Tariff and ARR 5th CP Order</th><th>DISCOMs' ARR Filings 2026-27</th></tr><tr><td>GENCO Thermal</td><td>70,009</td><td>55,887</td><td>55,887</td></tr><tr><td>GENCO Hydel</td><td>5,741</td><td>5,742</td><td>3,827</td></tr><tr><td>CGS</td><td>29,477</td><td>25,436</td><td>26,458</td></tr><tr><td>NCES</td><td>22,230</td><td>22,232</td><td>16,526</td></tr><tr><td>SEIL</td><td>2,006</td><td>1,773</td><td>1,886</td></tr><tr><td>Singareni</td><td>8,936</td><td>7,916</td><td>8,421</td></tr><tr><td>Short-term</td><td>1,093</td><td>---</td><td>---</td></tr><tr><td>Total</td><td>1,39,492</td><td>1,18,986</td><td>1,13,006</td></tr></table>Electricity availability is projected to increase from 95,711 MU in FY 2025-26 to 1,13,006 MU in FY 2026-27. That is, electricity availability is projected to increase by 18.07% during the ensuing financial year.</td><td>TGDISCOMs respectfully acknowledge that an electricity surplus of 11,025 MUs is projected for FY 2026–27, based on the estimated energy availability from generators and the overall energy requirement at the state level. TGDISCOMs are obligated to maintain adequate tied-up capacities to reliably meet both base and peak demand across most time blocks throughout the year.

As highlighted in the petition, procurement from short-term sources will be undertaken only when necessary.</td></tr>
</table>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	The ensuing FY will see a surplus of 11,025 MU (9.76%). If we take in to account the fact that TGDISCOMs overestimated power requirement during the ensuing FY the surplus power available will be even higher. TGDISCOMs did not include short-term purchases under availability though they have mentioned that short-term procurement would be resorted to depending on the need. Under power procurement cost TGDISCOMs included short-term power procurement. If this short-term procurement is also added total power available to TGDISCOMs during the FY 2026-27 the surplus power in Telangana during FY 2026-27 will be much higher.	To clarify, TGDISCOMs have considered short-term power purchases for the following purposes: 1. To address demand–supply gaps during hours when power requirement exceeds the available generation. 2. To optimize overall power procurement costs, by purchasing from the market during hours when market prices are lower than the variable cost (VC) of certain high VC generating stations. Since TGDISCOMs do not maintain any tied up capacity for short-term procurement, and such purchases depend entirely on real-time demand supply conditions and prevailing market prices, including this power in the energy availability calculations would misrepresent picture of the state's actual supply position.
8.	Power availability from TGGENCO plants is projected to increase from 42,782 MU in FY 2025-26 to 59, 714 MU in FY 2026-27, signifying an increase of 40% in power availability from TGGENCO. But this increase in power availability depends on achieving CoD of all 5 units of YTPS. Until now CoD of three units (I, II and IV) was achieved. While the Commission, through its order on 5th Control	TGDISCOMs have considered the Energy generation from all the 5 units of YTPS for FY 2026-27 as per the commissioning dates confirmed by TGGENCO vide letter 03.09.2025 according to which all the 5 units of YTPS will be commissioned by February 2026.

<table>
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<tr><td></td><td>Period, projected 22,232 MU availability from NCE sources during the FY 2026-27 TGDISCOMs projected 16,526 MU.</td><td></td></tr>
<tr><td>9.</td><td>Table 5: Renewable energy availability (MU)
<table><tr><th>Particulars</th><th>TSERC Retail Supply Tariff and ARR 5th CP Order</th><th>DISCOMs' ARR Filings 2026-27</th></tr><tr><td>Biomass</td><td>0.78</td><td>0.23</td></tr><tr><td>Bagasse</td><td>0.00</td><td>0.00</td></tr><tr><td>Municipal waste</td><td>91.69</td><td>257</td></tr><tr><td>Industrial waste</td><td>78.06</td><td>75</td></tr><tr><td>Wind</td><td>261.80</td><td>283</td></tr><tr><td>Mini hydel</td><td>0.22</td><td>0.37</td></tr><tr><td>Solar</td><td>6083.02</td><td>5,465</td></tr><tr><td>Solar (JNNSM Phase I)</td><td>119.80</td><td>107</td></tr><tr><td>Solar (NTPC)</td><td>858.66</td><td>770</td></tr><tr><td>Solar (SECI)</td><td>858.66</td><td>770</td></tr><tr><td>Solar (NTPC, NHPC CPSU) Tr-III 1545 MW</td><td>3316.56</td><td>3360</td></tr><tr><td>Solar (NTPC CPSU) Tr-I &II 1692 MW</td><td>3632.12</td><td>3258</td></tr><tr><td>SECI (ISTS Tr IX 1000 MW)</td><td>2146.64</td><td>1925</td></tr><tr><td>Additional RE Procurement</td><td>4784.00</td><td>255</td></tr><tr><td>Total</td><td>22232.01</td><td>16,526</td></tr></table>
Compared to their earlier filings as well as the quantum of availability approved by the Commission for the FY 2026-27 TGDISCOMs in their present filings reduced electricity</td><td>TGDISCOMs have projected the energy availability from Non-Conventional Energy (NCE) sources based on the contracted capacities of NCE generators including the ones that are expected to be commissioned in FY 2026-27. The estimated generation from these capacities has been arrived at by duly considering the historically observed generation patterns across various NCE sources.

In addition, the proposed solar capacity additions under the PM-KUSUM-A, PM Surya Ghar, and PM-KUSUM-C schemes have also been taken into account for estimation of Energy availability. The corresponding energy generation from these anticipated capacity additions has been included in Energy Availability by factoring in the expected commissioning timelines of the respective projects.</td></tr>
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<table>
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<tr><td></td><td>availability from solar power plants. They have also reduced additional RE procurement. They have not provided any reasons for revising their estimates.</td><td></td></tr>
<tr><td>10.</td><td>Power procurement cost:
Table 6: Power availability and procurement during FY 2026-27 (MU)
<table><tr><th>Source</th><th>Availability</th><th>Procurement</th><th>Variation</th></tr><tr><td>GENCO Thermal</td><td>55,887</td><td>44,790</td><td>11,097 (19.86%)</td></tr><tr><td>GENCO Hydel</td><td>3,827</td><td>3,827</td><td>0</td></tr><tr><td>CGS</td><td>26,458</td><td>18,181</td><td>8,277 (31.28%)</td></tr><tr><td>NCES</td><td>16,526</td><td>16,526</td><td>0</td></tr><tr><td>SEIL</td><td>1,886</td><td>1,701</td><td>185 (9.81%)</td></tr><tr><td>Singareni</td><td>8,421</td><td>6,206</td><td>2,215 (26.30%)</td></tr><tr><td>Short-term purchase</td><td>---</td><td>11,641</td><td></td></tr><tr><td>Short-term (sale)</td><td></td><td>(891)</td><td></td></tr><tr><td>Total</td><td>1,13,006</td><td>1,01,981</td><td></td></tr></table>
• TGDISCOMs' power procurement plan for the FY 2026-27 shows that 21,774 MU available from various thermal power plants is not being procured. Nearly 20% of power available from TGGENCO thermal power plants is not going to be procured. More than 30% of power available from CGS thermal power plants is not going to be procured. Nearly 10% of power available from SEIL thermal power plants is not going to be procured. More than one-fourth of power available from Singareni thermal power plants is not going to be procured.</td><td>TGDISCOMs would like to reiterate the fact that Energy procurement from short term sources is considered for the following reasons

1. Energy supply during hours of deficit (Power requirement > Power availability from generators). Despite having a total Energy surplus of 11,025 MUs, it is pertinent to note that there will be time blocks in the year when the instantaneous power requirement in the state is higher than the total generation capacity, pushing TGDISCOMs to procure the power deficit from short-term sources. Such instances of electricity deficit occur during Morning and evening peak hours when the Solar generation is not available. Hence, purchase from short term sources become inevitable with the current supply demand situation.

2. Power purchase cost optimization: TGDISCOMs have considered procurement from short term sources during hours when the Market price is lesser than the Variable cost (VC) of few generating stations with higher VC to optimize the overall cost of</td></tr>
</table>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	• Even when substantial capacity of thermal power plants available to Telangana state are going to be backed down during the FY 2026-27 TGDISCOMs proposes to procure 11,641 MU through short-term purchases. These short-term purchases account for 11.41% of total power procurement planned. • Even if these short-term power purchases are not resorted to, still Telangana state will have surplus power of more than 10,000 MU during FY 2026-27. • TGDISCOMs in their present filings noted their proposal to purchase power from short term sources on need-to-need basis. As the State is facing surplus power situation there shall be no place for short-term power purchases. Following the power availability and power requirements estimated by TGDISCOMs during the FY 2026-27 the state will have surplus power of more than 10,000 MU, without taking into account power proposed to be procured from short-term sources. In such power surplus situation, there shall be no place for short-term power procurement.	power procurement. It is clarified that the generation from TGGENCO, CGS, SEIL, SCCL plants are proposed to be backed down only during hours when market purchase is more economical in order to optimize the overall cost of the power purchase in the state. TGDISCOMs respectfully submit that we have estimated a total procurement of 3,346 MUs from Short term sources for supply during hours of power deficit and 8,295 MUs for Power procurement cost optimization.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	• Compared to the FY 2025-26 TGGENCO thermal power plants will be generating 16,932 MU additional power during the FY 2026-27. This power is expected to come from new Units (III, IV and V) of YTPS with aggregate generation capacity of 2,400 MW. At the same time TGDISCOMs propose to not to procure 21,774 MU available from various thermal power plants. This implies that these three new units of YTPS with aggregate capacity of 2,400 MW are not needed. A fundamental question arises in this context: When these three new units of YTPS with aggregate capacity of 2,400 MW are not needed, is there need for another 2,400 MW capacity from NTPC's Telangana STPS Stage-II? • TGDISCOMs estimated the total power purchase cost to be Rs. 54,567 Crore during the FY 2026-27 compared to the Commission's estimate of Rs. 49,667 Crore. TGDISCOMs' estimate of power purchase cost is 9.87% higher than that of the Commission.	TGDISCOMs submit that, as elaborated in the preceding sections, the planning of tied-up capacity is undertaken after carefully assessing the State's base-load and peak-load requirements throughout the year, using demand–supply analyses at a granular 15-minute time-block level. The existing peak-load characteristics of the State, particularly their occurrence during non-solar hours, necessitate adequate thermal capacity to ensure reliable supply during such periods. Further, we would like to submit that the backing down of thermal stations does not arise solely from energy-surplus conditions. Backing down is also undertaken to optimize overall power-purchase costs whenever market prices are more economical compared to the variable cost of certain generating stations. The long-term projections of the State's base-load and peak-load patterns continue to justify the requirement for 2,400 MW of capacity from the YTPS units.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	• Net power purchase cost arrived at by TGDISCOMs as well as the Commission depends on revenue envisaged from sale of surplus power during the FY 2026-27. While TGDISCOMs projected sale of 2,985 MU of surplus power the Commission projected sale of 16,755 MU of surplus power. Hitherto experience with selling surplus power is not very encouraging. Inclusion of estimated revenue from sale of surplus power only helps to show lower power purchase cost burden which in turn leads to lower or no tariff hike and lower subsidy burden on the state government. But reality will catch up at the time of true-up. • For the FY 2025-26, TGDISCOMs estimated the fixed costs of TGGENCO thermal units to be Rs. 8,492 Crore While the Commission approved Rs. 8,756 Crore towards the same. In case of FY 2026-27, TGDISCOMs projected fixed cost of TGGENCO thermal units to be Rs. 12,017 Crore. Substantial part of this increase in fixed costs during FY 2026-27 is due to YTPS. The Commission has not yet determined the capital cost of YTPS. Fixed costs of YTPS units shall be according to	We would also like to clarify that TGDISCOMs have proposed procurement of only 800 MW from the 3×800 MW NTPC Telangana STPS Stage-II project. We submit that, in estimating the power-purchase cost for FY 2026–27, a detailed block-level analysis of energy-surplus availability and prevailing Market prices has been undertaken for all time blocks across the year. Based on this assessment, the projection of surplus-power sales has been considered only for those blocks in which the Market price is higher than the Variable Cost (VC) of the generating stations, thereby ensuring that such transactions remain financially viable.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	the Commission's Order on capital cost determination of YTPS. Fixed costs of YTPS units in operation shall only be taken in to account. • TGDISCOMs have projected higher fixed costs during the FY 2026-27 in the case of other thermal power plants of TGGENCO compared to these costs during FY 2025-26, though there is no change in generation capacities. In the case of BTPS fixed cost is projected to be Rs. 280 crore higher during FY 2026-27 compared to the estimated fixed cost during the FY 2025-26. With capital cost at more than Rs. 9 crore per MW. BTPS is the costliest coal based thermal power plant in the country. The operation of the plant until now has shown that it is beset with problems due to substandard machinery/plant. Given this experience no more capital cost addition shall be allowed in the case of BTPS. • Regarding fixed costs of central generating stations (CGS) TGDISCOMs submitted as follows, "For FY 2026-27, the Licensee has considered the 3% escalation on the Fixed Costs incurred on full year projections of FY 2025-26 based on actual fixed cost of	It shall be noted that three units (Unit-1, Unit-2 & Unit-4) of YTPS have already been commissioned. Further, the remaining two units are expected to be commissioned prior to the commencement of FY 2026–27, as communicated by TGGENCO vide letter dated 03.09.2025. In view of the above, all five units of YTPS are anticipated to be under commercial operation during FY 2026–27. Accordingly, it is considered appropriate to take into account the fixed costs pertaining to all five units of YTPS for the said financial year. TGDISCOMs have projected the fixed cost for TGGENCO stations considering the additional capitalization of assets proposed by TGGENCO in their filings thereby resulting in higher Fixed costs in comparison with the previous years.

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<tr><td></td><td>first half (Apr'25 to Sep'25) of FY 2025-26." TGDISCOMs have not provided rationale for adopting this procedure.

• In the case of SEIL and Singareni thermal power plant also TGGDISCOMs adopted similar approach of escalation current years fixed cost by 3%. As they have not provided any rationale for this same shall be rejected.</td><td>TGDISCOMs have considered a 3% escalation in the Fixed cost of Central Generating stations (CGS) in order to account for the expected increase in the cost in FY 2026-27.

TGDISCOMs have considered a 3% escalation in the Fixed cost of SCCL and Singareni in order to account for the expected increase in the cost in FY 2026-27.</td></tr>
<tr><td>11.</td><td>In the case of Singareni thermal power plant different fixed cost figures are provided at different places:

Table 7: Fixed cost of Singareni thermal power plant
<table><tr><th>Particulars</th><th>2025-26 (Rs. in Cr)</th><th>2026-27 (Rs. in Cr)</th></tr><tr><td>Narrative part*</td><td>1326.43</td><td>1319</td></tr><tr><td>Power purchase cost summary**</td><td>1440</td><td>1379.80</td></tr><tr><td colspan="3">* TGSPDCL ARR, p.51
** TGNPDCL ARR, p. vi and vii; TGSPDCL ARR, p.54</td></tr></table>
This discrepancy needs to be clarified.</td><td>It is hereby clarified that TGDISCOMs have considered 3% escalation on the Fixed cost on full year projections of FY 2025-26 based on the Fixed cost incurred in the first half of FY 2025-26. The fixed cost projected for Singareni thermal power plant is as follows.

<table><tr><th></th><th>FY 2025-26</th><th>FY 2026-27</th></tr><tr><td>Fixed cost Singareni thermal (Crs)</td><td>1,340</td><td>1,380</td></tr></table></td></tr>
<tr><td>12.</td><td>• There is wide variation in projected variable costs of different plants of TGGENCO thermal plants. Except YTPS all other thermal plants are located near coal mines. At one end is Kakatiya TPP-II with variable cost</td><td>TGDISCOMs would like to bring to notice that irrespective of having similar geographical proximity from coal mines, different generators have</td></tr>
</table>

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	of Rs. 2.74 per unit, at another end is Kothagudem-VI with variable cost of Rs. 3.85 per unit. As all these plants are located in similar geographical conditions their wide variation in variable cost is puzzling. • Projected variable costs of different plants of TGGENCO thermal plants in the FY 2026-27 are lower than actual variable costs reported for the FY 2024-25. • Variable cost of Singareni thermal power plant (Rs. 3.46 per unit) is higher than TGGENCO's Kakatiya TPP-II (Rs. 2.74 per unit). • Variable cost of NTPC's Ramagundam I & II (Rs. 4.52 per unit) and Ramagundam-III (Rs. 4.45 per unit) is higher than TGGENCO's Kakatiya TPP-II (Rs. 2.74 per unit) though they are located in similar geographical conditions.	different Station Heat Rates (SHR) and other operating parameters leading to difference in variable costs The projections on the Variable cost (VC) of TGGENCO thermal stations has been done also considering the impact of variable cost reduction due to coal cost reduction by M/s Singareni Collieries company and the impact of changes in GST increase from 5% to 18% and abolition of Rs.400 Compensation CESS. The above has resulted in lesser VC projections for TGGENCO stations in comparison with the actual VC in FY 2024-25.
13.	TGDISCOMs propose to procure 11,641 MU of electricity through shot-term purchases at Rs. 3.45 per unit. This unit cost is higher than variable cost of several thermal power plants available to Telangana state which sought to be backed down to facilitate short-term power procurement.	TGDISCOMs would like to reiterate the fact that Energy procurement from short term sources is considered for the following reasons 1. Energy supply during hours of deficit (Power requirement > Power availability from generators)

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	We request the Commission not to allow short-term power procurement by TGDISCOMs.	2. Power purchase cost optimization: TGDISCOMs have considered procurement from short term sources during hours when the Market price is lesser than the Variable cost (VC) of few generating stations with higher VC to optimize the overall cost of power procurement. To further detail the above, 3,346 MUs Electricity for supply during deficit hours is projected to be procured from short-term sources at ~Rs.4.99/unit and 8,295 MUs Electricity for Power purchase optimization is projected to be procured during hours of low market prices at Rs. 2.81 per unit. This leads to an overall procurement cost of ~Rs.3.43/unit from for the total 11,641 MUs to be purchased from short term sources. Here, it is pertinent to note that, the procurement from short term sources for deficit supply is done only when the entire generation capacity is dispatched and the procurement from short term sources for Power purchase optimization is done only by backing down the thermal generators having higher VC than the then existing market (Short term source) prices resulting only in the reduction of overall power procurement cost.

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14.	**Table 8: T&D Costs f TGDISCOMs for FY 2026-27** (Rs. in Cr) | Expenditure	NPDCL		SPDCL	
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	Filings	Approved	Filings	Approved
Transmission cost	1,726	1,795.83	4,133	4,302.05
Distribution cost	4,953	4,058.86	7,616	6,053.99 | • The Commission had issued the Retail Supply Tariff Order for FY 2024-25 and ARR for each year of the 5th control period on 28th October 2024. In that order the Commission had approved ARR for each year of the 5th control period. TGDISCOMs in their present filings have claimed that in accordance to the regulation and above Order of the Commission the DISCOMs have computed the ARR for FY 2026-27. But there is wide variation between the ARR approved by the Commission for the FY 2026-27 as a part of 5th Control Period and the present filings by the TGDISCOMs. In the case of all expenditure items except transmission cost DISCOMs have shown higher expenditure compared to that approved by the Commission through the above MYT Order. At the same time TGDISCOMs did not provide reasons for the variations in expenditure. • In the case of TGNPDCL while the Commission had	TGSPDCL respectfully submits that there is no violation of the MYT principle under TSERC (Multi-Year Tariff) Regulation, 2023 (Regulation No. 2 of 2023). In accordance with clause 6.2 of Regulation 2 of 2023 requires the distribution licensee to file, for every year after the first year of the Control Period, an annual petition containing the true-up of the previous year and the revised Aggregate Revenue Requirement (ARR) for the ensuing year, along with the revised tariff and charges. Further, the MYT framework mandates that the Commission shall determine the ARR and tariff for each year of the Control Period separately, and also provides for the treatment of controllable and uncontrollable variables. The ARR approved in the original MYT Order serves only as a baseline projection, and the Regulation does not freeze the ARR; instead, it anticipates annual updates based on actual capitalization, O&M norms, true-up impacts, and other permissible adjustments. Hence, the proposed ARR does not contravene the MYT Order nor undermine regulatory

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	approved Rs. 4,058.86 crore towards distribution cost the DISCOM is claiming Rs. 4,953 crore which is higher by Rs. 894 crore (22% higher). Similarly, in the case of TGSPDCL while the Commission had approved Rs. 6,053.99 crore towards distribution cost the DISCOM is claiming Rs. 7,616 crore which is higher by Rs. 1,562 crore (25.80% higher). Given this wide deviation TGDISCOMs' claims related to distribution cost for the year 2025-26 shall be thoroughly scrutinized. • Net result of this is that TGDISCOMs have arrived at higher ARR compared to the ones approved by the Commission. Given this deviation from the ARR approved by the Commission DISCOMs' claims on ARR for the FY 2026-27 needs to be subjected to thorough scrutiny. This is particularly important because TGDISCOMs did not provide justification for higher expenditure over and above the limit set by the Commission.	consistency, as it has been filed strictly in accordance with the provisions of Regulation No. 2 of 2023. The reduction in Transmission cost claimed than approved in MYT order is by considering the APR of TGTRANSCO for FY2024-25. The increase in the Distribution cost of TGSPDCL is by considering the additional capex for the proposed conversion of OH line to UG cabling in metro area of Hyderabad in the 1st phase. It is humbly submitted that TGDISCOMs have estimated the Annual Revenue requirement involving prudence in the estimation of Revenue and cost. The Hon'ble commission is requested to review the same.
15.	Electrical Accidents:	

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	Table 9: Fatal electrical accidents **Particulars** / **2024-25** (NPDCL, SPDCL) / **2025-26 H1** (NPDCL, SPDCL) General public No. — 377, 97, 158, 131 Ex-gratia No. — 388, 138, 124, 382 Ex-gratia Paid Rs. Cr — 19.90, 6.74, 6.40, 18.99 Compensation to Animals Rs. Cr — 3.83, 1.01, 1.14, 4.23 • During the FY 2024-25, 474 fatal electrical accidents involving humans had taken place in the State. During the first half of FY 2025-26 the number of such fatal accidents stands at 289. These numbers show that there was no let up in occurrence of fatal electrical accidents in the State. Directives issued by the Commission to the TGDISCOMs to take steps to bring down the number of these fatal electric accidents do not seem to have much impact.	In compliance with the Commission's directive, TGNPDCL has submitted the Electrical Accidents and Ex-gratia Report with complete details for FY 2024-25 to Hon'ble Commission. TGNPDCL requests the Hon'ble Commission to consider the amounts claimed and submitted as per the filings. ➢ TGNPDCL Regularly conducting safety awareness programmes like prajabata and interacting with public representatives and citizens, rectifying defects immediately. ➢ And conducting polambata with agriculture farmers and pattana bata with CITY/town consumers and recording complaints and rectifying defects. ➢ TGNPDCL is identifying and rectifying vulnerable/dangerous locations i.e., damaged poles, leaning poles, intermediate poles, DTR Plinth height raising and loose lines etc. during Praja Bata, Polambata and Pattanabata ➢ and all possible steps taking to minimise the accidents by rectifying the identified (through TGNPDCL APP) vulnerable locations. ➢ Conducting pep talks with department staff every day before going to work at section level and arranged all safety equipment to avoid accidents to department staff.

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- As a part of its response to the Commission's directive related to electrical accidents TGNPDCL provided causes for electrical accidents that have taken place during FY 2025-26. These causes are divided in to accidents for which consumers/external factors are responsible and for which department is responsible. Following are some of the causes for which consumers/external factors are held responsible:

Table 10: Causes for electrical accidents

Accidents Taken place with Consumer side fault or external factors	No. of accidents
Victim came in to Contact with live Conductor (with or without any object)	56
While replacing HG fuses or LT Fuses of DTR / PTR or Touching the Fuse Box @ DTR	14
While working on existing line for maintenance / Construction of New Line	14
Pole damaged and fell down due to Heavy gale and wind	3
Touched the Sagged/Snapped / fallen conductor due to Gale & Wind	3
Touching the Snapped and fallen conductor	10
Total	100

- People come in to contact with live conductors because they are sagging. It is the responsibility of the DISCOMs to see that conductors are in good condition. Consumers try to replace fuses of DTRS because DISCOM personnel do not respond to the complaints in time forcing the consumers to take risk. It is the

</td><td>

- To avoid electrical accidents due to loose lines, damaged poles and TGNPDCL identified such locations providing middle poles and providing spacers in line where ever pole erection is not possible.
- TGNPDCL providing toll free numbers such as 1912 & 1800 425 0028 at the DTR structure/plinth, if any fuse complaints observed by farmers to intimate the department through toll free numbers. 3)As per the complaints received from toll free numbers, till now TGNPDCL has resolved 57954 complaints of Billing, Accidents, Voltage related, Supply failure related et., from April 2025
- To avoid electrical accidents, Safety Awareness programs conducting in public domain through praja bata, pattana bata and polama bata programs mainly to educate and creating awareness among public.
- TGNPDCL erected 12324 Nos middle poles for loose lines and 16952 nos new poles erected in place of damaged and fell down due to heavy gale and wind during FY 2025-26.

- TGNPDCL using toll free numbers such as 1912 & 1800 425 0028 for consumers to raise their complaints and giving wide publicity of above Toll free numbers on Dept Vehicles and on Transformers and also informing to public during safety awareness programmes. The complaints registered on toll free numbers are being resolved. The complaints of Billing, Accidents, Voltage related, Supply failure related etc., from April 2025 TGNPDCL conducting safety awareness

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	responsibility of the DISCOM to repair damaged poles and conductors in time to avoid accidents. All the above 100 accidents shall fall in the DISCOM account. Consumers shall not be held responsible for these accidents. • TGSPDCL responded to this directive as follows, "The report on Electrical Accidents and Ex-gratia shall be submitted to the Hon'ble Commission." • As a part of the Distribution Business true up for the year 2024-25 TGNPDCL claimed Rs. 25.14 Crore towards compensation/ex-gratia paid to electrical accidents. In the filings related to ARR and RST Proposals for FY 2026-27 TGNPDCL recorded that Rs. 23.73 Crore expenditure was incurred during FY 2024-25 towards compensation/ex-gratia paid to electrical accidents. Similarly, TGSPDCL claimed Rs. 20.18 Crore, as a part of the Distribution Business true up for the year 2024-25, towards compensation/ex-gratia paid to electrical accidents. In the filings related to ARR and RST Proposals for FY 2026-27 TGSPDCL recorded that Rs. 7.75 Crore expenditure was incurred during FY	programmes like prajabata (3 days in a week) with village consumers, polambata (twice in a week) with agriculture formers and pattana bata with CITY/town consumers in public domain and recording and rectifying complaints on spot. The contact Nos of AE/ADE are displayed at GP offices and Newspapers for raising their complaints. Also creating awareness to the consumers for not to attend the repair works and inform to the concern NPDCL authority. • It is to submit that Rs.25.14 Crs towards compensation/ex-gratia paid to electrical accidents and claimed the same amount in DB True up for FY 2024-25 filings as per audited accounts and the case wise details are submitted to the Hon'ble Commission.

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	2024-25 towards compensation/ex-gratia paid to electrical accidents. There is discrepancy in the amounts claimed by TGDISCOMs towards compensation/ex-gratia paid to electrical accidents during FY 2024-25. This needs to be verified. • The information provided by TSDISOMs on electrical accidents show that most of the fatal accidents took place in circles with predominantly rural services. These accidents are low in urban circles. This implies that the rural consumers are not receiving quality service. Every step shall be taken to correct this anomaly.	1)To avoid electrical accidents in agriculture fields and rural residential areas Safety Awareness programmes conducting in public domain through praja bata (3 days in a week) with village consumers, polambata (twice in a week) with agriculture farmers, mainly to educate and creating awareness among rural public and farmers. 2) TGNPDCL rectified the following line defects during FY 2025-26 mainly in rural areas and agriculture fields a. **12324** Nos middle poles for loose lines erected. b. **16952** nos new poles erected in place of damaged/rusted and fell down due to heavy gale and wind c. 10890 DTR structures were rectified d. 745 nos DTR plinth hight raised e. 6415 DTR earthing renovated. 3) TGNPDCL providing toll free numbers such as 1912 & 1800 425 0028 at the DTR structure/plinth, if any fuse complaints observed by farmers to intimate the department through toll free numbers. 4)As per the complaints received from toll free numbers, till now TGNPDCL has resolved 57954 complaints of Billing, Accidents , Voltage related, Supply failure related et., from April 2025.
16.	Arrears:	It is submitted that both DISCOMs have been consistently taking focused steps for arrears reduction through sustained monitoring, intensified

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	• According to TGNPDCL filings of FY 2026-27 total arrears of Rs. 50,000 and more pending for six months as on 30-09-2025 are Rs. 17,968.45 crore. These arrears are higher than ARR approved by the Commission for FY 2025-26. According to TGSPDCL filings of FY 2026-27 total arrears of Rs. 50,000 and more pending for six months as on 30-09-2024 are Rs. 2, 418.68 crore. These arrears are equal to 5.88% of ARR approved by the Commission for FY 2025-26. Compared to the previous year TGSPDCL has reduced the arrears substantially. Substantial portion of these arrears have to come from state government departments. (While TGSPDCL mentioned the arrears due from Government departments, TGNPDCL did not show these details. TGNPDCL provided circle wise information). According to TGSPDCL submission arrears due from state government departments stand at Rs. 1,543.06 crore accounting for 63.8% of the arrears. Situation may be the same or even worse in the case of TGNPDCL. In the case of TGNPDCL 99% of the arrears are due from HT consumers. According to Section 1.2 i) of UDAY – MoU all outstanding dues	collection drives, disconnection of defaulting consumers as per the Electricity Act, 2003 and Supply Code provisions, and periodic engagement with large consumers. As rightly noted by the objector, TGNPDCL has achieved a substantial reduction in arrears compared to the previous year, reflecting the effectiveness of these measures. In TGNPDCL, the Govt. department wise arrears breakup of Rs. 50,000 and more pending for Six months as on 30.09.2025 is given below:- **Sl.No Department (Rs. In Crs.)** 1. LT Panchayat Raj - 415.75 2. LT Muncipal & Urban - 107.42 3. HMWS - 1351.26 4. HT Muncipal & Urban - 231.00 5. HT Lift Irrigation - 11522.92 6. Mission Bhagiratha - 2512.76 7. Central Government - 0.40 8. State Government - 106.48 9. Others - 150.37 ---------- Total Government Arrs 16398.36 10. PRIVATE Arrears 1570.09 ---------- TOTAL Arrears 17968.45 ----------

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	from the government departments to DISCOMs for supply of electricity shall be paid by 31-03-2017. Since then, arrears from state government departments in fact have increased. • If the arrears below Rs. 50,000 are also taken in to account total arrears due to TGDISCOMs will be much higher. Because of these mounting arrears TGDISCOMs are forced in to heavy debt burden and it is one of the reasons for losses incurred by the TGDISCOMs.	Further, it is to inform that 91% of above arrears are accumulated due to payments not received from the Government. The arrears pertains to State Government departments, NPDCL has been regularly pursuing with the concerned Government departments through institutional mechanisms and periodic reconciliations. Regarding the reference to Clause 1.2(i) of the UDAY MoU stipulating clearance of Government department dues by 31-03-2017, it is submitted that while the DISCOMs have been continuously flagging the issue at appropriate levels, the clearance of such dues depends on budgetary allocations and policy decisions of the State Government. Non-realisation of these amounts cannot be construed as a lapse on the part of the DISCOMs, particularly when supply to essential Government services cannot be abruptly discontinued. It is therefore submitted that arrears from Government departments are a systemic issue, being addressed through coordinated efforts with the State Government, and the same should not be viewed as inefficiency in DISCOM operations. The demonstrated improvement in arrears position, especially in the case of TGNPDCL, clearly establishes the DISCOMs' commitment to financial discipline and revenue recovery.

8. Response to Sri. PV Subba Reddy, Convenor, Bharatiya Agro Economic & Research Centre.

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1.	Financial performance The ARR gap of RS 12521 cr is higher, and not substantiated measures	TGDISCOMs have duly assessed and arrived at the gap. TGDISCOMs humbly request Government of Telangana to fulfill the requested revenue gap. TGDISCOMs shall abide by the directions of the Hon'ble Commission with regard to revenue gap. TGDISCOMs are continuously striving to reduce the gap every year, by continuous power purchase optimization, improving internal efficiency and shall continue to do so.
2.	The employee costs are more than approved	The Hon'ble Commission has approved O&M expenses by applying escalation on the average of the true-up expenses for the immediate preceding control period, and this if further escalated for 3 years as per clause No. 81 of Regulation No. 2 of 2023. However, the approved amount so derived is lower than the actual expenditure incurred during FY 2023-24. O&M cost escalation is based on CPI/WPI indices in accordance with Regulation 81.3 based on actuals for FY 2024-25. This revision is primarily on account of actual employee cost, repairs & maintenance activities, and administrative expenses, projected based on CPI/WPI. The Hon'ble Commission has approved Employee cost for FY 2024-25 by applying escalation on the average of the true-up expenses for the immediate preceding control period, and this if further escalated for 3

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		years as per clause No. 81 of Regulation No. 2 of 2023. However, the approved amount so derived is lower than the actual expenditure incurred during FY 2023-24. The revised O&M expenses projected for FY 2026-27 is computed based on actual costs and inflation. We request the Commission to consider these variations as we have filed our submission in accordance with MYT Regulations, 2023 (2 of 2023).
3.	All segments of distribution are higher than approved by Commission. The justification by facts or given	The increase in depreciation, interest on working capital and return on equity is due to variation in asset base considered by Hon'ble Commission is lower against actuals as per book of accounts for FY 2024-25. The revised ARR for FY 2026-27 is computed based on actual cost trends, inflation, and capital investment requirements. We request the Commission to consider these variations as we have filed our submission in accordance with MYT Regulations, 2023 (2 of 2023).
4.	suggests prudent management of borrowings	TGDISCOMs submits that, in order to reduce the financing cost burden, DISCOMs are actively engaging with lenders to renegotiate existing loan terms, including seeking reduction in interest rates, and exploring restructuring options wherever feasible, with the objective of lowering the overall cost of debt. These efforts are ongoing to ensure that the interest burden on consumers is minimized and the financing structure becomes more sustainable. In case of any reduction in interest rates

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		achieved through these negotiations or restructuring will be fully reflected and claimed appropriately during the True-up.
5.	In view of the precarious financials of discoms, the companies are not financially viable entities to carry on the huge essential public utility services. Structural financial crisis due to high purchase cost, subsidy burden To procure economically Reliance on govt subsidy is a concern, defeats very purpose of arr,true up Understates cost dynamics, excluding contingencies, future true up impose retrospective liabilities	TGDISCOMs would like to re-iterate that high power purchase cost, extension of uninterrupted supply and mounting arrears is a key reason for the financial health of the Licensees. TGDISCOMs are regularly pursuing with the Government of Telangana to collect the electricity dues and arrears. Further, TGDISCOMs are making best efforts in optimizing its power purchase cost so that financial and interest burden on discoms can be managed effectively
6.	Status of implementation of directives	Status of Implementation of Directives is already furnished as part of ARR Filing to the Hon'ble Commission.
7.	The data on accidents, month wise also not submitted. The accidents are on the rise and precious lives are lost case wise reasons are to be provided	TGNPDCL submit that the details of accidents, along with cause wise reasons, have already been furnished as part of the ARR filings.
8.	Efforts to improve internal efficiency for gap in ACS and ARR are also not filed	TGDISCOMs submits that continuous efforts are being made to reduce ACS-ARR gap. TGDISCOMs are actively pursuing clearance of outstanding electricity dues from the Government of Telangana, which is required for participation in the RDSS scheme, and proposals have also been submitted to the Ministry of Power, Government of India. In

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		parallel, TGDISCOMs are regularly conducting consumer awareness programs and wide publicity through newspapers to promote energy conservation, use of LED lighting and star-rated appliances, which together contribute to improving efficiency and reducing ACS–ARR gap over time. Further following measures also taken up for improving the internal efficiency and reducing ACS–ARR gap: 1. Intensive inspections are being carried out for detection of → Loss of energy in the form of theft either by meddling of internal circuit of meters or by any external means involving bypassing of consumption recording in the meter. → Unauthorized utilization of energy for other than sanctioned purpose. → Drop/missing of Voltages or currents recording in the meters either by defect in the meter/metering equipment or physical & electrical disconnection of CTs/ PTs from meter due to damage of cable connections. → Accumulated unbilled energy in the meters by manual suppression resulted either by billing in Non IRDA mode or meter defective/change. → Common usage/multiple services in single premises.

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		2. Measures are being taken for sealing of meter box, TTB & MTC of the energy meter to ensure no manual interference of meter by any unauthorized individuals. 3. During billing, recorded Voltages & currents in the meter are being communicated to EBS which are being analyzed for detection of abnormalities in meter. Further, monthly MD's recorded in HT services are being communicated through AMR's which are being analyzed for detection of shortfall in MD. 4. Surprise inspections are carried during early morning & late night hours in seasonal industries like Brick manufacturing units, Poultry farms, newly formed ventures & under construction sites for detection of abnormalities if any 5. Necessary action is being taken in coordination with operation wing & concerned SLC in respect of legal cases pertaining to DPE units filed before Honorable Court & writ petitions disposed by the Honorable High Court of Telangana with directions to District courts to adjudicate under section 154 of the Indian Electricity Act, 2003. 6. Inspections are carried out by analyzing the consumption pattern of services & energy audit of dedicated DTRs/feeders. Further, inspections in theft prone areas are carried by DPE wing for

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		curbing the leakage of energy duly booking cases against estimated energy lost.
9.	Reg govt dues, Hon'ble commission is requested to direct to provide for provision as per accounting norms	Under the purview of Hon'ble commission
10.	Loss reduction measures required to file comprehensive report	The following measures are taken up for loss reduction: ➢ Bifurcation/ segregation of overload/lengthy 33KV&11KV feeders, erection of new 33/11KV Substations, new DTRs, load balancing etc., are being done regularly by monitoring the loads on 33KV and 11KV feeders. ➢ Capacitor Banks are being installed at 33/11KV SS, and 600KVAr Line Capacitor Banks on overload 11KV feeders to improve Power Factor. ➢ Special drive is also being conducted for fixing of 2/3KVAR capacitors at Agl. pump sets wherever they are not available for reactive power compensation and efficient utilization of AGL pump sets, new AGL services are released only after ensuring 2/3KVAR capacitor fixed at consumer AGL pump sets. ➢ Intensive inspections are being conducted regularly on high loss 11KV feeders for reduction of losses by attending exceptional, booking of theft cases, providing of seals to the meters etc.

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		➢ Vulnerable locations are being identified ie, hotspots in sub stations, loose joints on lines etc are being rectified immediately. ➢ Network reconductoring for replacement of old conductor with an optimal conductor size. ➢ Augmentation of PTRs and Substations to avoid over loading. ➢ Regular energy audit at 11kV feeder/DTR level.
11.	Energy audit quarterly not made available	Quarterly reports are being uploaded in TGNPDCL website.
12.	Demand growth is significant, pressure on infra and costs Requires capex expediency	The proposed capital expenditure for FY 2026-27 includes both the capex already approved by the Hon'ble Commission for the 5th Control Period and the additional capex requirements of Rs. 95 crore include schemes such as UG Cabling and GMSPV (Solar) have been taken up only after obtaining approval of the Hon'ble Commission, and the expenditure will be subject to prudence check before being capitalised. Therefore there is no excess capex claimed by TGNPDCL
13.	DTR replacement is done only after breakdown	IN TGNPDCL DTR maintenance programme is being carried out from 16th to 20th of every month to reduce the DTR failures. During this DTR maintenance programme the following defects are being rectified. 1. Low level DTR plinths, the plinth height will be raised by the contractor, 2. Spacers and middle poles are being provided in loose lines, 3. Leaned poles are being rectified.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
		4. Replacement of short poles with new one. 5. Re-earthing is being done if required. 6. AB switches are being provided/repaired 7. Lugs, Bush rods, Bushes are being replaced. However, if any DTR will fail due to line fault, the same failed DTR is being transported in dept vehicle and healthy DTR is being arranged in place of failed one. TGNPDCL transported 32807 failed DTRs out of total 35287 DTR failures i.e. 93% of failed DTRs with department 2MT/3 MT vehicles.
14.	3rd DISCOM formation is not taken in to consideration in filings	The formation of the 3rd DISCOM involves completion of prescribed statutory and administrative procedures, including approval of the licensee, bifurcation of assets and liabilities, and fulfillment of other due processes, and upon completion of these requirements, the same will be duly considered in the subsequent filings.
15.	When a farmer applies for an AGL connection, he is told that neighboring farmers are not allowed to lay the ltne, so he is not given a connection, and is told that he should talk to that neighboring farmer himself It is requested that the department to take up this responsibility. In such instances the poles should be laid along the roads and boundaries, not in the middle of the field.	TGDISCOMs respectfully submits that agricultural connections are released in accordance with prescribed SOPs. Wherever feasible, HT/LT lines and DTRs are routed along existing roads or field boundaries, to avoid inconvenience to farmers. The right of way for erection of poles for release of new connection is under the scope of applicant only. If any DTR is identified as dangerous to humans and to animals, the same DTR structure is being renovated by taking all safety measures

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	Several DTRs are in the midst of crops, cultivating land, is prone for accidents. Such DTRs to be relocated sumoto without request of farmers.	during DTR maintenance programme. During 2025-26, DTRs maintenance was done for 1,34,453 Nos DTRs Relocation of all DTRs is not possible due to various technical reasons such as load centre and voltage profile.
16.	Safety measures and network upgradation is at snail pace, snapped wires, Lack of AB switch, low hanging cables Is a common scene.	TGNPDCL rectified the following line defects during FY 2025-26 mainly in rural areas and in agriculture fields a. **12324** Nos middle poles are erected for loose lines rectification. b. **16952** nos new poles erected in place of damaged/rusted and fell down due to heavy gale and wind c. 10890 DTR structures were rectified d. 745 nos DTR plinth height raised e. 6415 DTR earthing renovated.
17.	Hon commission amended regulation of ORC. consumers are issued estimates, but pending for payment. Request to include under modified regulation.	The Regulation No.1 of 2026 issued by TGERC will be implemented as per guidelines.
18.	The huge number of petitions filed in response to ARR, Cgrfs as well customer service centers are testimony for violation of SOP Standard's.	The licensee achieved the overall SOP. Quarterly SOP reports are being submitted to Hon'ble commission.
19.	While laying electricity towers and lines farmers or general public do not receive any prior information, nor the utilities such as their consent before entering the fields which belongs to electricity is being supplied from 11 kV to 765 kV. Electricity poles are being	TGDISCOMs respectfully submits that laying of distribution infrastructure is carried out strictly in accordance with SOP guidelines, with due regard to public safety. Wherever required, prior intimation and compensation are being provided.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	planted with a radius of 12 inches and extending up to half an acre, starting from the supports. On such poles, electricity floor ws from 11 kV to 133, 220, 440 and 765 kV lines. Due to the flow, there is a possibility of its adverse effect on the crops grown in the vicinity of those lines, resulting in low crop yields. Its adverse effect on the livestock of the farmer, especially on pregnant animals, is more and the livestock is also lost. When farmers are working in their fields, women farmers, including pregnant women and men, are working for hours and are falling ill due to the effects of electric cycles and are suffering from diseases like cancer. Farmers are deprived of their livelihood, loss of crop and possible health problems while laying a transmission line and possibly towers in their land often access to land owned by them is restricted loss of economic value for their land due to laying of electric line in between their fields, the financial capacity of Small and marginal farmers are more severely affected. Prior consent is not being taken before laying of power lines. Compensation is not paid adequately and thus to redress their grievances are limited for the farmers, except to approach courts. The major problem is the area being taken only limited to four legs of the tower pylon structure. The farmer cannot cultivate either with bullocks or tractor 5 meters radius, apart the tower all	The area occupied for poles or towers is kept within approved safety limits, and farmers are generally allowed to continue cultivation with due safety precautions. TGDISCOMs remains committed to protecting farmer interests, ensuring safety of people and livestock, and addressing grievances through established mechanisms, while also ensuring reliable power supply for public benefit. TGNPDCL is supplying electricity through LT, 11 KV and 33 KV level network. TGNPDCL commonly uses PSCC poles only to lay the network. Erection of PSCC poles will not take more than 0.75 Meter radius. Hence, there is no scope of its adverse effect on the standing crops in the vicinity lines.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	round being dangerous zone while carrying out Agri operations. So the total area to be compensated should be increased. Compensation towards diminution of land value in the width of Right of way row corridor due to laying of lines should be 100% of land value as per market rate and applicable under Land Acquisition Act 2013 or on lease permanently which has to be paid half yearly in September- October and March, April annually. The authorities are not adhering to the laid down rules, regulations for land acquisition, ROW. violations to be treated as cognizable offensive. Necessary rules, regulations, protocols to be defined and ensured for compliance. The above procedure of following guidelines should be strictly adhered to and responsibility to be fixed on supervisory authority of not less than Superintendent Engineer. Their deviation should attract criminal proceedings denying or ignoring poor farmers as they are unaware of their right which gives scope to once ride them and cash their ignorance of their rights. Police or any officials should not interfere nor threaten the farmers. In future as the Private Sector may come into the field as a player we have to be careful in strictly implementing for the benefit of farmer.	

S.No.	Summary of Objections / Suggestions	Response of the Licensee
20.	prescribe a framework for electrical lines with comprehensive guidelines for compensation in accordance with land acquisition act of 2013. The transmission network blue print to be designed and approved by state government statutory planning bodies. In the absence of the framework the lines are laid disorderly, compromising safety, depleting national resources.	The TGDISCOMs submit that the laying of electrical lines and transmission infrastructure is carried out in accordance with the prevailing statutory provisions, technical standards, and guidelines issued by the Hon'ble Commission.

9 to 12 Response to Sri. Vijaya Bhasker, Sri. Sridhar Reddy, Sri. Domaru Ram and Sri. Sri Ranga Rao Bharatiya Kisan Sangh

<table>
<tr><th>S.No.</th><th>Summary of Objections / Suggestions</th><th>Response of the Licensee</th></tr>
<tr><td>1.</td><td>The company has not sustained the measures to bridge revenue gap by operational efficiency.</td><td>TGDISCOMs submit that they are continuously striving to improve operational efficiency by implementing loss reduction measures and power purchase optimization initiatives. These efforts are ongoing and sustained, and the details have been comprehensively outlined in the Operational Performance chapter of the ARR filings.</td></tr>
<tr><td>2.</td><td>Customer complaints, accident cases details are to be provided</td><td>TGNPDCL Consumer Complaints:
<table>
<tr><th>FY</th><th>Complaints received</th><th>Resolved</th><th>Pending</th></tr>
<tr><td>2024-25</td><td>67297</td><td>67297</td><td>0</td></tr>
<tr><td>2025-26(Upto Jan-26)</td><td>53220</td><td>53099</td><td>121</td></tr>
</table>
Pending 121 complaints are under rectification.
TGNPDCL submit that the details of consumer accident cases, along with ex-gratia sanctioned, have already been furnished as part of the ARR filings.</td></tr>
</table>

13. రిటైల్ సప్లయి వ్యాపారము కోసము 2026-27 ఆర్థిక సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు ధరల ప్రతిపాదనలు & క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనలు పై శ్రీ. ఎల్. మాణిక్ రెడ్డి, నవాబుపేట, వికారాబాద్ గారి సూచనలు/సలహాలకు సమాధానాలు.

క్రమ సంఖ్య	అభ్యంతరాలు /సూచనలు	TGNPDCL – సమాధానాలు
1.	తమరితో మనవి ఇది కదా! కరెంటు డిపార్ట్మెంట్ వారు తమకు సంబందించిన అన్ని రకాల ఉత్తర ప్రత్యుత్తరాలు మరియు డిపార్ట్మెంట్ కు సంబందించిన ప్రతి సమాచారముకు తెలుగు భాషలో అచ్చు వేయించగలరని తమ ద్వారా కోరుచున్నాం.	TGNPDCL కొన్ని ముఖ్యమైన విషయాలకు సంబంధించి సిటిజెన్ చార్టర్, విద్యుత్ ప్రమాదాల నివారణకు అవగాహన కల్పించుటకు కరపత్రాలను మరియు గోడ పత్రికలను తెలుగులోనే ముద్రించి ప్రచారం చేయడం జరుగుతుంది. ఇంకా వార్త పత్రికలలో ఇచ్చే ప్రకటనలను సమగ్ర ఆదాయ ఆవశ్యకత ఫైలింగ్స్, టారిఫ్ ధరలను మొదలైనవాటిని తెలుగులో ఇవ్వటం జరుగుతుంది. మీ సూచనలకు ధన్యవాదములు. మీరు ఇచ్చిన సలహాను పరిగణలోకి తీసుకొంటాము

14. రిసైల్ సప్లయి వ్యాపారము కోసము 2026-27 **ఆర్థిక సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు ధరల ప్రతిపాదనలు** & **క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనలు పై శ్రీ. ఎమ్. శ్రీధర్ రెడ్డి, నల్లకుంట, హైదరాబాద్ గారి సూచనలు/సలహాలకు సమాధానాలు**.

క్రమ సంఖ్య	అభ్యంతరాలు /సూచనలు	TGNPDCL – సమాధానాలు
1.	గౌరవ కమిషన్ వారు 2025-26 సం. టారిఫ్ ఆదేశాలలో GMR ఎయిర్ పోర్ట్ లో వాణిజ్యము విమాన సరఫరా వినియోగాలను విడదీసి వివరాలు మూడు నెలల లోపల సమర్పించుటకు గతంలో ఆదేశాలు ఇవ్వడం జరిగింది. కాని కంపెనీ ఇప్పటికి కూడా అమలులోకి తేలేదు. ఈ వివరాలు పొందుపర్చిన తరువాతనే ఆదాయ ప్రతిపాదనలు పరిశీలించగలరు.	లైసెన్స్ పరిదిలో లేని అంశం
2.	దశాభ్దాలుగా ఈ ప్రతిపాదనలకు సంబందించిన వివరాలు తెలుగు భాషలో వెలువరించుటలేదు, ఇంతకు పూర్వమే కమిషన్ వారు తగు ఆదేశాలు ఇవ్వడం జరిగింది. అయినప్పటికీ ఆదేశాలను బేఖాతరు చేస్తూ ఆంగ్లం లోనే సమర్పిస్తున్నారు. వీటిని నిర్బంధంగా తెలుగు లోనే సమర్పించే విధంగా తగు ఆదేశాలు జారీచేయాలి.	మీరు ఇచ్చిన సలహాను పరిగణలోకి తీసుకొంటాము.

15. రిటైల్ సప్లయి వ్యాపారము కోసము 2026-27 **ఆర్థిక సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు ధరల ప్రతిపాదనలు** & **క్రాస్ సబ్సిడీ సర్చార్జీ ప్రతిపాదనలు పై శ్రీ. గూడ మహేందర్ రెడ్డి, సిద్ధిపేట గారి సూచనలు/సలహాలకు సమాధానాలు**

క్రమ సంఖ్య	అభ్యంతరాలు /సూచనలు	TGNPDCL – సమాధానాలు
1.	వ్యవసాయ పొలాల వద్ద ట్రాన్స్ ఫార్మర్ ఓవర్ లోడ్ అయితే సమస్యను తీర్చే భాద్యత ఎవరిదీ ?	వ్యవసాయ పొలాల వద్ద ట్రాన్స్ ఫార్మర్ ఓవర్ లోడ్ అయితే సమస్యను తీర్చే భాద్యత డిస్కమ్ వారిదే.
2.	రైతులు డబ్బులు పెట్టి ఎస్టిమేషన్ వేయించుకుని అదనపు ట్రాన్స్ ఫార్మర్ పెట్టించుకోవాలా ? అలాగైతే కనెక్షన్ కోసం ఎస్టిమేషన్ డబ్బులను తిరిగి ఇస్తారా ? ఇవ్వరా ?	వ్యవసాయ ట్రాన్స్ ఫార్మర్ ఓవర్ లోడ్ అయినప్పుడు అదనపు ట్రాన్స్ ఫార్మర్ ఏర్పాటు చెయ్యడానికి రైతులు ఎలాంటి డబ్బులు సంస్థ కి చెల్లించాల్సిన అవసరం లేదు.
3.	రైతులు విద్యుత్ షాక్ తో మరణిస్తే తక్షణ సాయం చావు ఖర్చులకు ఇస్తారా? సంవత్సరానికి ఇస్తారా? మిగతా డబ్బులు ఇవ్వడానికి ఎన్ని రోజుల కాలపరిమితి ఉంది?	తక్షణ సహాయం చెల్లించుట లేదు, సరైన దస్తావేజులు సమకూరిన తక్షణమే పరిపాలన అనుమతి తీసుకోని డబ్బులు చెల్లించుట జరుగుతుంది.
4.	రైతులు చనిపోయినపుడు ఇంటిమేషన్ ఇస్తున్నారు దీని ఆధారంగా పరిశీలన జరిపించి ప్రాసెస్ చేయవచ్చు. కానీ కాగితాలు సరిగా లేవని కాల యాపన జరుగు సందర్భాలు ఉన్నాయ్. డెత్ సర్టిఫికెట్ ఆధారంగా ప్రాసెస్ చేయవచ్చా? లేదా? దయచేసి తెలుపగలరు.	డెత్ సర్టిఫికెట్ ఒక్కదాని తో ప్రాసెస్ చేయరాదు. డెత్ సర్టిఫికెట్ తో పాటుగా, పోస్టుమార్టం రిపోర్ట్, FIR రిపోర్ట్, GP సర్టిఫికెట్, వార్త పత్రిక క్లిప్పింగ్, కుటుంబ సభ్యుల వివరాలు & వినతి పత్రం సరైన దస్తావేజులు సమకూరిన తక్షణమే పరిపాలన అనుమతి తీసుకోని డబ్బులు చెల్లించుట జరుగుతుంది.