

31/1/26

To

The Secretary

Telangana Electricity Regulatory Commission
Sy. No.145-P, Vidyut Niyantran Bhavan Kalyan Nagar, GTS Colony,
Hyderabad

Respected sir,

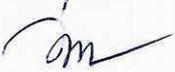
Sub: Submission of Objections/Suggestion on O.P. Nos.70&72 of 2025; O.P. Nos 21 & 22 of 2025 of TGSPDCL ARR filings.

I herewith file the Objections/Suggestions regarding the above.

I request you to consider this submission and permit me to present further details during the public hearing.

Thank you.

Yours sincerely,



PV SUBBAREDDY

Convenor

Bharatiya Agro Economic & Research Centre

2-2-24/P, D D colony

Baghamberpet

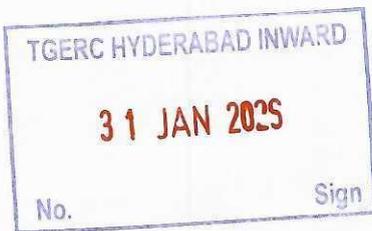
Hyderabad 500013

Telangana

Mob 9949912610

Cc to

Chairman and Managing Director, TGSPDCL, MINT COMPOUND,
HYDERABAD



Financial performance

The employee costs are more by 15 % than approved

All segments of distribution are higher than approved by Commission. The justification by facts or given . instead reason that Commission approved lower is untenable.

High cost Rs 6.53 of market purchases vis approved cost rs 3.39 needs scrutiny

Miscellaneous exp of Rs 2494 are unexplained The schedules msy br provided

SPDCL balance sheet as of 31/3/24 accumulated losses are 40380 CT against paidup capital of Rs.12017 cry only with huge 28362 Chr negative net worth.

Even considering the short, long term borrowings and capital ,still the accumulated losses are more.

The interest burden on short term increased 808 cr suggests prudent management of borrowings

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 art, true up

Understates cost dynamics, excluding contingencies, future trus up impose retrospective liabilities

Status of implementation of directives

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

Efforts to improve internal efficiency for gap in ACS and ARR are also not filed

Reg govt dues the reply is routine. Hon commission is requested to direct to provide for provision as per accounting norms

Loss reduction measures given only by circles and head office is required to file comprehensive report

Emery audit quarterly not made available

Segregation of commercial and avian activity GMR airport is not complied

Notice for compliance for power factor is not implemented

1.16.1. In respect of statement of government of Telangana, The petitioners responded and the government has also participated in the hearing, but no undertaking is given.

Request to disallow any such considerations in ARR.

Demand growth is significant, pressure on infra and costs

Requires capex expediency

DTR replacement is done only after breakdown

3rd DISCOM formation is not taken in to consideration in filings

- A. When a farmer applies for an AGL connection, he is told that neighboring farmers are not allowed to lay the line, 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.

Several DTRs are in the midst of crops, cultivating land, is prone for accidents. Such DTR s to be relocated sumoto without request of farmers

- B. Safety measures and network upgradation is at snail pace, snapped wires, Lack of AB switch, low hanging cables Is a common scene.
- C. Hon commission amended regulation of ORC. consumers are issued estimates, but pending for payment. Request to include under modified regulation.
- D. The huge number of petitions filed in response to ARR, Cgrfs as well custome service centres are testimony for violation of SOP Standard's
- E. 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 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 ~~is~~ 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 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.

prescribe a framework for electrical lines with comprehensive guidelines for compensation in accordance with land acquisition act of 2013.

The transmission net work blue print to be designed and approved by state government statutory planning bodies.

In the absence of the frame work the lines are laid disorderly, compromising safety, depleting national resources.