



दक्षिण मध्य रेलवे SOUTH CENTRAL RAILWAY



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स.नो.ई E.19/5/1/3/TGERC/Vol I

दिनांक Date:- 18.02.2026.

**The Secretary,**  
Telangana State Electricity Regulatory Commission,  
Vidyut Nyantran Bhavan,  
Sy.No.145-P, G.T.S. Colony, Kalyan Nagar,  
HYDERABAD-500 045.

Sub: Addendum to the South Central Railway representation against the Proposed Retail Supply Tariff for HT-V(A) -Railway Traction category of S.C Railways for FY-2026-27.

Ref: This office letter ever no. dated 30.01.2026.

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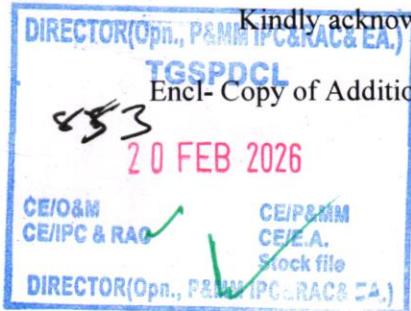
In continuation to the letter cited at reference, South Central Railway here with submitting the additional objections on TGDISCOMs ARR's and Retail Tariff Schedule proposals for the year 2026-27.

South Central Railway is requesting the Hon'ble commission to condone the delay caused in submission of addendum to the objections and humbly requesting to kindly consider the additional objections of the Railways (copy enclosed).

A copy of the additional objections has also been submitted to Chief Engineer (RAC), TGSPDCL and Chief Engineer (IPC & RAC) TGNPDCL.

Apart from this representation, South Central Railway is also requested to be heard in person during public hearing scheduled on 07.03.2026 at TGERC office.

Kindly acknowledge the receipt.



Encl- Copy of Additional Objections on proposed HT-V(A) Tariff proposal.

Digitally signed by GOPAL MUDAVATH  
Date: 2026.02.18 18:36:16 +05'30'  
**GOPAL MUDAVATH**  
(M. GOPAL)  
CHIEF ELECTRICAL DISTRIBUTION ENGINEER  
SOUTH CENTRAL RAILWAY  
SECUNDERABAD

C/- 1. Chief Engineer (IPC&RAC), TGSPDCL, Corporate Office, 1<sup>st</sup> Floor, 'A' Block, Mint Compound, Hyderabad, Telangana 500063.

2. Chief Engineer (IPC & RAC), TGNPDCL, H.No. 2-5-31/2, Vidyut Bhavan, Nakkalagutta, Hanmakonda-506001.



DIR/IPC & RAC

The Hon'ble commission is respectfully pleaded for kind consideration of the following additional objections of the Railways.

**Objections regarding installation of Unidirectional Meters at Railway Traction Substations (TSS) instead of Bidirectional / ABT Compliant Meters, non-accounting of Regenerative Energy injected into Grid, and non-grant of Open Access NOC – Request for directions:**

1. **Inherent design of the latest Electric Locomotives with regenerative braking:** Modern electric locomotives are equipped with regenerative braking systems, whereby electrical energy generated during braking is injected back into the grid, particularly during off-peak/low traction load conditions.
2. **Power flow at the interface shall be bi-directional:** The drawal entity (Railway TSS) is connected to the Intra-State Transmission System, and power flow at the interface shall be reversible due to regenerative braking.

Thus, power flow at the TSS interface point is inherently bidirectional in nature.

In the state of Telangana, out of the total 31 Railway Traction Substations over S.C. Railway, in 14 Railway Traction Substations, DISCOMs have installed unidirectional energy meters instead of bidirectional/ABT-compliant interface meters and at 17 Railway Traction Substations, bidirectional meters provided but they are made to function as unidirectional meters.

**3. The issues with unidirectional meters:**

- a) Energy exported (regenerative energy) from Railways to the grid is not recorded.
- b) Only import energy is measured.
- c) Net energy accounting is not carried out.
- d) No tariff or settlement mechanism is applied for exported energy.
- e) This results in complete non-recognition of legitimate energy injected into the grid.

**4. Non-Installation of ABT Meters Despite Payment made with TGTRANSCO.**

Railways submit that:

- a) Necessary charges for installation of ABT-compliant interface meters have already been paid to TG TRANSCO.
- b) However, ABT-compliant bidirectional meters have not been installed at 14 Railway Traction Substations interface points, instead, unidirectional meters have been provided.

Failure to install ABT meters defeats the purpose of interface metering under Availability Based Tariff (ABT) principles and causes financial prejudice to Railways.

**5. Non-Grant of NOC for Open Access:**

Railways have applied for NOC to avail power as 'drawee entity connected with intrastate transmission system' as per CERC GNA Regulations -2022 on 17.06.2025 with TGTRANSCO.

- a) NOC for Open Access has not been granted by TGTRANSCO to Railways.

- b) This is despite the regulatory framework under CERC (Connectivity and General Network Access to the inter-State Transmission System) Regulations, 2022, which mandate transparent connectivity, scheduling, and accounting principles for transmission-connected entities.
- c) Interface metering must record actual bidirectional energy flow.
- d) Denial of NOC coupled with non-installation of ABT meters results in regulatory and financial disadvantage to Railways.

The combined effect of non-grant of Open Access and absence of ABT metering affecting procurement flexibility and prevents transparent energy accounting and fair settlement.

#### **6. Forced Undertaking by DISCOM:**

In one of the Traction Substations, DISCOM has insisted that Railways furnish an undertaking stating that Railways will not claim compensation or credit for regenerative energy injected into the grid as a pre-condition for extending supply.

Such insistence:

- a) Is an arbitrary and unilateral.
- b) Has no statutory backing under the Electricity Act, 2003.
- c) Defeats the principle of fair energy accounting.
- d) Discourages energy-efficient technologies like regenerative braking.

#### **7. Regulatory Principles Involved:**

As per established electricity regulatory and grid operation principles:

- a) Interface metering at EHT/HT levels must be bidirectional where power flow is reversible.
- b) ABT-compliant meters are required at transmission interconnection points.
- c) Energy accounting must reflect both import and export.
- d) Suppression or non-recording of export energy is contrary to grid discipline and transparency norms.

Interface metering must reflect actual bidirectional energy flow as per established metering and grid operation principles. Railway Traction Substations, being bulk HT/EHT consumers connected to the grid, qualify for proper interface metering consistent with ABT principles.

#### **8. Prayer to the Hon'ble Commission:**

Railways respectfully request the Hon'ble Commission to:

- a) Direct TGTRANSCO / TGDISCOMs to immediately install ABT-compliant bidirectional interface meters at all Railway TSS and GSS locations.
- b) Ensure proper accounting of both import and export energy.
- c) Direct billing to be carried out on net energy basis.
- d) Artificial suppression of export data is contrary to grid discipline.
- e) Unaccountable regenerative energy system affects, Energy efficiency incentives and Decarbonization objectives of the nation.
- f) Non-recognition of such injection defeats national energy efficiency goals.
- g) Direct DISCOMs not to insist on any undertaking denying legitimate export claims.
- h) Issue appropriate directions regarding grant of Open Access NOC in accordance with statutory provisions.

**9. Conclusion**

- Railways are injecting regenerative energy into the State Grid without recognition due to unidirectional metering arrangements, despite payment for ABT meters and established system connectivity.
- The present situation is technically unsound, financially inequitable, and contrary to grid operation principles and regulatory intent.
- The matter is therefore placed before the Hon'ble Commission for urgent regulatory intervention.

In view of the facts and technical submissions placed on record, the Hon'ble Commission is most respectfully prayed to admit and consider the above additional objections of the Railways in the true spirit of regulatory fairness and grid operation principles, and to grant appropriate relief by setting aside the unwarranted financial burden arising on this account.

The Railways, being a strategic public utility with inherent technical contribution to grid stability, may kindly be extended equitable regulatory consideration.

Submitted for the kind consideration and appropriate orders of the Hon'ble Commission.

**GOPAL MUDAVATH** Digitally signed by GOPAL MUDAVATH  
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**(M. Gopal)**  
**Chief Electrical Distribution Engineer**  
**South Central Railway,**  
**Secunderabad**