

GHIAL-P&E-TGSPDCL & TGERC- 2026-146-29.01.2026

To

(1) Chief Engineer (RAC)

Southern Power Distribution Company of Telangana Limited (TGSPDCL)
Corporate Office, 1st Floor, 'A' Block, Mint Compound,
Hyderabad – 500063

(2) The Commission Secretary

Telangana Electricity Regulatory Commission
Vidyut Nyantran Bhavan, Sy. No. 145-P,
G.T.S. Colony, Kalyan Nagar, Hyderabad – 500045

Dear Sir,

Subject: Objections / suggestions of GMR Hyderabad International Airport Limited (GHIAL) on the ARR proposed by TGSPDCL for the 5th Control Period i.e., FY 2024-25 to FY 2028-29 & Tariff Proposals for FY 2026-27.

Reference:

1. ARR filings proposed by TGSPDCL for the Aggregate Revenue Requirement for Retail Supply Business for the 5th Control Period (FY 2024-25 to FY 2028-29) & Tariff Proposals for FY 2026-27.
2. Lr No: GHIAL-P&E-TGSPDCL and TGERC-2024-103 dated on 10.10.2024
3. Lr No: GHIAL-TS-TSERC-SEC-2022-14168/13.05.2022

We invite reference to the ARR filings proposed by TGSPDCL for the 5th Control Period from FY 2024-25 to FY 2028-29 and the Tariff Proposals for FY 2026-27, as published vide public notice dated 29 November 2025 and the details of ARR uploaded on the TGERC website.

In this regard, we would like to submit the following:



GMR HYDERABAD INTERNATIONAL AIRPORT LIMITED

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S NO	Para No in the Petition, If applicable	Proposal of TGSPDCL as made in the petition	Objection/ Suggestion/Comments
1	Para No 2.5, D No:20	<p>Description: TGSPDCL is directed to consider the feasibility of segregating commercial activity and aviation activity at GMR Airport and submit a report to that extent within 3 months.</p> <p>Compliance Report: The report regarding commercial activity and aviation activity at GMR Airport was requested from the concerned field officers and the same shall be submitted immediately after it is received from the respective officers.</p>	<p>Our Submissions:</p> <p>1. With respect to the Hon'ble State Commission's directives in previous tariff orders to TGSPDCL and TGSPDCL's request thereon, we M/s GMR Hyderabad International Airport Ltd.,(GHIAL) took steps for implementing segregation of the non-aviation loads and aviation loads outside the terminal at source level and a new 220/33KV Substation was built by GHIAL at a cost of around INR 15 Crores, which was handed over to TGTRANSCO to facilitate the segregation of loads and this Substation was energized by TGTRANSCO on 22nd July, 2020.</p> <p>Thereafter, GHIAL applied to TGSPDCL for two new HT services (HT-II Commercial and HT-I Industrial) from the aforesaid Substation.</p> <p>Consequently, all major non-aviation loads from the airport network were segregated by laying separate network at a huge additional capital cost and connected these loads to the new HT Service connections in presence of TGSPDCL officials. With the above, Airport now has four HT Services with separate metering at Source Level.</p> <ol style="list-style-type: none">1. HT-III Aviation Service at 220 kV2. HT-II Commercial Service at 33 kV (Two services)3. HT-I Industrial Services at 33 kV <p>With the above, segregation of major non-aviation loads from the existing aviation network at source level (DISCOM's metering point} as requested by TGSPDCL for complying to the directives of Hon'ble Commission has been completed on 07. 5.2022 and the same was communicated to both TGSPDCL and Hon'ble State Commission vide our letters dated 13.05.2022 and 10.10.2024 Respectively.</p> <p>In view of the above, we humbly request Hon'ble State Commission to treat the above directive as complied.</p>



2. Request for revision of GMR Airport's Tariff at 132KV level and from existing ratio of Aviation to Non-Aviation loads from 61:39% to 80:20% ratio

Hon'ble APTEL in Appeal No. 12 of 2011 held that *if it is not feasible to have separate metering arrangements for the aviation activities and purely commercial activities, then the State Commission could re-categorize the Appellant in a separate category other than HT Commercial II and determine the composite tariff for aviation and the commercial activities of the Appellant.*

For the Tariff Year 2012-13, in pursuance of the Hon'ble APTEL's order in Appeal No. 12 of 2011, considering the challenges involved in segregation of aviation and non aviation loads, Hon'ble State Commission created a new category for Airports by considering a composite tariff with *aviation load at 61% and the non-aviation loads at 39% ratio.*

Since the major non-aviation loads have been segregated from the aviation network in compliance to the directives of Hon'ble State Commission, **resultantly, the load pattern ratios for the existing airport activities at GMR Airport for have changed as per table provided herein below:**

Sl No	Type of Load	Before Load Segregation	After Non-Aviation Load Segregation
1	Aviation	61%	80%
2	Non-Aviation	39%	20%

Vide our representations dated 13.05.2022 and 10.10.2024, we requested Hon'ble State Commission and TGSPDCL to consider revising the HT-III tariff (132KV Level and above) by computing the aviation load at 80% and non-aviation load at 20%. (Annex 1 & 2)

We are enclosing the details of aviation and non activities on the airport load, which evidence the ratio of 80% of aviation load and 20% of non aviation loads. (Annex: 3).



			We therefore humbly request the Hon'ble Commission to revise the HT -III tariff for Airport (132KV level and above) as per the revised the load ratios.
2	1.2.3	Summary of Existing and Proposed Electricity Retail Supply Tariffs. <u>Incentives under Time-of-Day (ToD) Tariff</u>	Comment: We understand from the Hon'ble Commission's order dt 15.11.2025, on removal of TOD tariff incentive for the night duration (from 22:00 hrs to 06:00 hrs) was based on the DISCOM's submissions that the day time power procurement cost as is cheaper than that of the night time power procurement cost. The said order was made applicable for the period from 1 st Dec 2025 to 31 st March 2026. Now TGSPDCL is proposing to continue the same ToD tariff structure removing the incentive for night time operations. In this regard, we would like to take reference to the Electricity (Rights of Consumers) Amendment Rules, 2023 issued by Government of India, wherein it is clearly mentioned that "tariff for solar hours of the day, specified by the State Commission shall be at least twenty percent less than the normal tariff for that category of consumers". We therefore humbly request the Hon'ble State Commission to introduce the incentive of INR 1.50/- per unit during the solar availability period (ie from 10 am to 6pm) in terms of Electricity (Rights of Consumers) Amendment Rules, 2023 or retain the earlier mechanism of night incentive of Rs. 1.50/- for the period from 22:00 hrs to 06:00 hrs.

In view of the above submissions, we respectfully request that these objections be duly considered while finalizing the retail tariff proposal of TGSPDCL. We further request an opportunity for a **personal hearing** to elaborate on our submissions.

Name of the Objector: Bixam Bhukya, General Manager-Engineering
Correspondence Address: Old Site Office, Block-A, Near GMR Aero Towers, RGI Airport, 501218
Email Id: Bixam.bhukya@gmrgroup.in
Contact Number: 7894420933

Objection filed against (Name of TGDISCOM): Chief Engineer (RAC)
Whether copy of objection/suggestion/comments enclosed: Yes
Whether proof of delivery of copy objection/suggestion/comments at licensees office enclosed: Yes
Whether Objector wants to be heard in person: Yes

For GMR Hyderabad International Airport Limited


Vijay Rathod
Chief Project & Engineering Officer
GMR Hyderabad International Airport
(Chief Project & Engineering Officer)

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GHIAL-TS-TSERC-SEC-2022-14168/13.05.2022

The Secretary, TSERC,
Singareni Bhavan, Red Hills,
Hyderabad

Dear Sir,

Sub: Directives in Retail Supply Tariff Order 2022-23: Segregation of Loads in Airport – Reg;

- Ref: 1) Hon'ble Commission's Retail Supply Tariff Orders 2015-16, 2016-17, 2017-18, 2018-19 & 2022-23
2) Our Representation to Telangana State Southern Power Distribution Company Limited (TSSPDCL) dated 27-01-2021

This is with reference to the segregation of aviation and non-aviation power loads within Hyderabad International Airport and directives issued by the Hon'ble State Electricity Regulatory Commission (TSERC) (Hon'ble Commission) vide the Retail Tariff Supply Order 2022-23.

In this regard, we wish to bring the following for your kind perusal and advice to TSSPDCL.

In the Retail Tariff Supply (RST) Order 2012-12, a special consumer category of HT-III (Airports) was introduced by the Hon'ble Commission, after taking into cognizance of the complex distribution network of airport operations. Based on DISCOM's Load Assessment report and complexities in segregation of airport loads, a composite tariff was fixed by the Hon'ble Commission for the newly introduced HT-III category at a ratio of Aviation loads at 61% and Commercial loads at 39%. Novotel Hotel and other non-aviation loads were duly considered under the 39% commercial loads.

Whereas, Hon'ble Commission in the RST Orders of 2015-16 & 2016-17, suggested TSSPDCL to explore the possibility of segregating the Novotel Hotel and other commercial loads from Aviation Loads. This directive of the Hon'ble Commission was based on the objections raised by some people during public consultation process, who misunderstood that Novotel Hotel in Airport was being charged at a lower tariff, without knowing that these loads were already considered and factored under commercial loads of 39% in the composite tariff (supra).

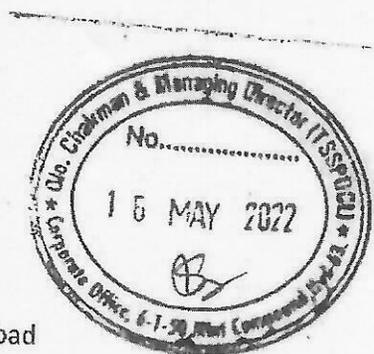
- 1) However, with respect to the Hon'ble Commission's directives to TSSPDCL and TSSPDCL's request thereon, GMR Hyderabad International Airport Ltd. (GHIAL) explored the possibility of implementing segregation of the non-aviation loads and aviation loads outside the terminal at source level.

- 2) Accordingly, a new 220/33KV Substation was built by GHIAL at a cost of around Rs. 15 Crores, which was handed over to TSTRANSCO to facilitate the segregation of loads and this Substation was energized by TSTRANSCO on 22nd July 2020.
- 3) Thereafter, GHIAL applied to TSSPDCL for two new HT services (HT-II Commercial and HT-I Industrial) from the aforesaid Substation. Consequently, all major non-aviation loads from the airport network were segregated by laying separate network at an additional cost and got them connected to the new HT Service connections in presence of TSSPDCL officials. With the above, Airport now has three HT Services with separate metering at Source Level.
- HT-III Aviation Service at 220 KV Voltage
 - HT-II Commercial Service at 33 KV Voltage
 - HT-I Industrial Service at 33 KV Voltage
- 4) With the above initiative, we wish to inform you that segregation of major non-aviation loads from the existing aviation network at source level (DISCOM's metering point) as requested by TSSPDCL for complying to the directives of Hon'ble Commission is completed.
- 5) While so, smaller non-aviation loads at lesser voltage levels are not feasible for segregation at source level, due to the complexities involved in existing distribution network. For these loads such as advertisement hoardings across main access road and BPCL petrol bunk, GHIAL proposed to install separate energy meters at the identified internal feeders and requested TSSPDCL for billing them at the applicable rates under sub metering, which is a more pragmatic and effective method under the circumstances without causing any loss to the TSSPDCL. A copy of our representation to TSSPDCL is enclosed here with for ready reference.
- 6) Since the major non-aviation loads have been segregated and resultantly, the load pattern ratios of 61% Aviation and 39% Non-aviation loads have changed, we accordingly requested TSSPDCL to carry out re-assessment of load pattern for the remaining loads so as to compute the cost of Aviation service and submit to the Hon'ble Commission for finalizing HT-III Tariff.

We therefore humbly request the Hon'ble Commission to advise TSSPDCL to carry out Load Assessment Study for Aviation Service as the major non-aviation loads have been segregated and submit the cost of service to the Hon'ble Commission for finalizing HT – III Tariff.

Thanking You,
For GMR Hyderabad International Airport Ltd.,

Vijay Rathod
(Chief Projects and Engineering Officer)



Copy to:

- 1) The Chairman and Managing Director/TSSPDCL/Hyderabad
- 2) The Superintending Engineer-Operation/RJNR/TSSPDCL/Hyderabad

GHIAL-P&E-TGSPDCL & TGERC-2024-103

Date:10.10.2024



To

- (1) Chief Engineer (RAC),**
Southern Power Distribution Company of Telangana Limited (TGSPDCL)
Corporate Office, 1st floor, 'A' block, Mint Compound,
Hyderabad-500063
- (2) The Secretary,**
Telangana Electricity Regulatory Commission
Vidyut Nyantran Bhavan, Sy.No.145-P,
G.T.S. Colony, Kalyan Nagar, Hyderabad 500045

Dear Sir,

Sub: Objections/suggestions of GMR Hyderabad International Airport Limited (GHIAL) on the ARR proposed by TGSPDCL for the 5th Control Period i.e., from FY 2024-25 to FY 2028-29 & Tariff Proposals for FY 2024-25

Ref: ARR filings proposed by TGSPDCL for the Aggregate Revenue Requirement for Retail Supply Business for 5th Control Period i.e., from FY 2024-25 to FY 2028-29 & Tariff Proposals for FY 2024-25

We invite reference to ARR filings proposed by TGSPDCL for the 5th Control Period from FY 2024-25 to FY 2028-29 & Tariff Proposals for FY 2024-25 vide the public notice dated 20 September 2024 and the details of ARR uploaded on website of TGERC.

1. **Increase in Energy Charges for HT-III (Airport, Bus Station and Railway Stations)-** TGSPDCL proposes to increase the energy charges for HT-III category at par with that of HT-II Commercial category.

Comment: The proposed hike in energy charges for HT-III, making it at par with Commercial HT-II (please refer to the table below) is unprecedented and exorbitant and in conflict with the orders passed by this Hon'ble Commission and by Hon'ble Appellate Tribunal of Electricity (APTEL).

	Existing Tariff	Proposed Tariff for Fy 2024-25	Existing Tariff	Proposed Tariff for Fy 2024-25
Voltage Level	Aviation (HT-III)	Aviation (HT-III)	Commercial (HT-II)	Commercial (HT-II)
11KV	8.50	8.80	8.80	8.80
33KV	7.85	8.80	8.00	8.80
132KV & Above	7.45	8.80	7.80	8.80

GMR HYDERABAD INTERNATIONAL AIRPORT LIMITED

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At this juncture, it is pertinent to mention here that as per the Judgment of Hon'ble APTEL dated 22 July 2011 in appeal No.12 of 2011 (G.M.R. Hyderabad International Airport Ltd. Vs. Andhra Pradesh Electricity Regulatory Commission & Anr.) herein Hon'ble APTEL held that Airports could not be put in the commercial category and on the other hand must be put in a separate category and different tariffs should be determined as per direction of the Appellate Tribunal of Electricity.

Accordingly, based on TGSPDCL Load Assessment Report and complexities in segregation of airport loads, the Hon'ble Commission vide its earlier order dated 30 March 2012 had created a separate tariff category for airports i.e. HT-III category and fixed a composite tariff at a ratio of Aviation loads at 61% and Commercial loads at 39%.

However, with respect to the Hon'ble Commission's directives to TGSPDCL and TGSPDCL's request thereon, GHIAL took steps for implementing segregation of the non-aviation loads and aviation loads outside the terminal at source level and a new 220/33KV Substation was built by GHIAL at a cost of around INR 15 Crores, which was handed over to TGTRANSCO to facilitate the segregation of loads and this Substation was energized by TGTRANSCO on 22nd July, 2020.

Thereafter, GHIAL applied to TGSPDCL for two new HT services (HT-II Commercial and HT-I Industrial) from the aforesaid Substation. Consequently, all major non-aviation loads from the airport network were segregated by laying separate network at an additional cost and got the connected to the new HT Service connections in presence of TGSPDCL officials. With the above, Airport now has three HT Services with separate metering at Source Level.

- ▶ HT-III Aviation Service at 220 KV Voltage
- ▶ HT-II Commercial Service at 33 KV Voltage
- ▶ HT-I Industrial Service at 33 KV Voltage

With the above, segregation of major non-aviation loads from the existing aviation network at source level (DISCOM's metering point) as requested by TGSPDCL for complying to the directives of Hon'ble Commission is completed. While so, smaller non-aviation loads at lesser voltage levels are not feasible for segregation at source level, due to the complexities involved in existing distribution network. For these loads such as advertisement hoardings across main access road and BPCL petrol bunk, GHIAL proposed to install separate energy meters at the identified internal feeders and requested TGSPDCL for billing them at the applicable rates under sub metering, which is a more pragmatic and effective method under the circumstances without causing any loss to the TGSPDCL.

Since the major non-aviation loads have been segregated and resultantly, the load pattern ratios have changed as per table provided herein below and GHIAL had already submitted details of the of the said loads with TGSPDCL their perusal and the necessary revision and yet no revision has been made.

Sl No	Type of Load	Before Load Segregation	After Non-Aviation Load Segregation
1	Aviation	61%	80%
2	Non-Aviation	39%	20%

In view of the above, the proposal of TGSPDCL of equating energy charges for HT-III category at par with the energy charges for HT-II commercial tariff category is arbitrary and contrary to earlier directions issued by Hon'ble APTEL and by this Commission and should not be considered.

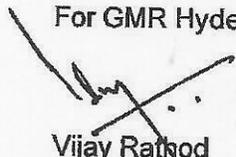
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2. As per para 11.2.5 (HT-III) Airports, Bus Stations and Railway Stations The licensee proposes an increase in demand charge for all voltage levels (11kV, 33kV, 132kV&above) and an increase in energy charges making it same for all voltage levels (11Kv, 33kV, 132kV & above)

Comment: The proposed increase in energy charges for consumers having energy meters at 220KV, 33KV and accounting for all transformer and distribution losses, applying an 11KV voltage level tariff isn't justified and disregards the technical differences. This discrepancy may lead to unfair pricing and affect consumer interests as a common tariff might not accurately reflect the actual energy costs and losses associated with different voltage levels.

In view of the above cited suggestions. we request your good selves to consider the same while finalizing the retail tariff proposal of TGSPDCL. Further, we would request the Hon'ble Commission to afford us with an opportunity to be heard during the course of the hearing to enable us to further elaborate on the suggestions made herein above.

Thanking you.

For GMR Hyderabad International Airport Limited



Vijay Rathod
Chief Project & Engineering Officer
GMR Hyderabad international Airport limited
Rajiv Gandhi International Airport Limited
(Chief Project and Engineering Officer)