

To

The Secretary

Telangana Electricity Regulatory Commission

Sy.No.145-P, Vidyut Niyantran Bhavan

Kalyan Nagar, GTS Colony, Hyderabad

June 2, 2026

Respected sir,

Sub : Request for extending time for submission of objections and suggestions in OP No.10 of TGSPDCL and TGNPDCL, seeking consent of the Hon'ble Commission for procurement of 1500 MWh through battery energy storage system to be established by TGGENCO and OP No.13 of 2026 filed by TGGENCO, seeking consent of the Hon'ble Commission for adoption of tariff discovered through competitive bidding for 1500 MWh through BESS to be established by it

With reference to the public notices on the two subject OPs dated 18.5.2026, we request the Hon'ble Commission to extend time for submission of our objections and suggestions at least by 20 days and reschedule dates of public hearings appropriately for the following reasons, among others:

- 1. We were preoccupied with preparing and making submissions on formation of TGRPDCL till the 29th of last month when public hearing was held on the same. As such, we could not study the two subject OPs and prepare submissions so far. It is not possible to study the same, analyse the issues, prepare and file our submissions before the due date, i.e., 8.6.2026 or within one week from today.**
- 2. The subject issue is a complicated one and is being taken up for consideration by the Commission for the first time. For interested objectors like me, it takes a lot of time to study, analyse and prepare meaningful and purposeful submissions in the matter, with both the petitions running into 538 pages.**
- 3. By 11th of this month, we have to file our submissions before APERC on an equally important issue, i.e., on creation of a Rural DISCOM exclusively for supply of power to agricultural consumers in Andhra Pradesh. In view of highly complicated and complex issues involved in this issue also, we are seeking extension of time from APERC to file our submissions.**
- 4. TGDISCOMs have sought consent of the Commission for procurement of 1500 MW through BESS to be established by TGGENCO (OP 10 of 2026). Without getting consent of the Commission, the DISCOMs have entered into agreement with TGGENCO for the same and the latter floated bids and selected bidders for setting up BESS units and is requesting the Hon'ble Commission to give its consent for adoption of the tariffs discovered through competitive bidding. The approach of DISCOMs and GENCO shows their gross disrespect for the regulatory process of the Commission and verges on**

impropriety. Their approach is tantamount to taking consents of the Commission for granted.

5. The tariffs discovered through competitive bidding are very much higher compared to tariffs for BESS discovered by other states and even the neighbouring state of Andhra Pradesh.

6. Instead of TGDISCOMs themselves floating tenders and selecting bidders, leaving that job to TGGENCO and agreeing to pay a commission of Re.0.07 per kwh throughout the period of agreement, i.e., for a period of 15 years, is highly detrimental to the interests of the consumers of the DISCOMs.

7. Some of the terms of the agreement also are detrimental to larger consumer interest and need to be modified and corrected.

8. In the light of proposed formation of Rythu DISCOM, this arrangement would give rise to further complications. We can make detailed submissions on these issues, after careful study of the issues.

9. That no objector could file objections and suggestions in the subject issue so far confirms the kind of complexity of the issue and need for sufficient time to study, analyse and prepare submissions.

10. This issue will have long-term impact on the interests of the state, DISCOMs and their consumers. Hence, a careful examination of all the implications of the proposed arrangement is imperative before the Hon'ble Commission taking an appropriate decision to protect interests of the consumers.

11. The petition of TGDISCOMs need to be taken up first and after giving consent for procurement of the proposed energy under BESS, the petition of TGGENCO needs to be taken up for the consideration of the Hon'ble Commission. Or, else, as we have been suggesting over the years, all issues, i.e., need for power, here, under BESS, tariff and agreement may be taken up under one petition for consideration of the Hon'ble Commission to take a holistic view of the issues involved before taking an appropriate final decision.

12. In view of the above submissions, we request the Hon'ble Commission to extend time for filing objections and suggestions in the subject matter and reschedule dates of public hearings.

Thanking you,

Yours sincerely,

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