

BEFORE THE HON'BLE TELANGANA ELECTRICITY REGULATORY COMMISSION (TGERC),
HYDERABAD

I.A. No. 4 of 2026
in
O.P. No. 24 of 2020

OBJECTIONS FILED BY THE OBJECTOR
(Under PM-KUSUM Component-A)

Objector:

Name: Smt. Podduturi Premalatha Devi
Village: Pipri
Mandal: Mudhole
District: Nirmal District, Telangana

To
The Commission Secretary,
Telangana Electricity Regulatory Commission (TGERC),
Hyderabad.

Respected Sir,

I, Smt. Podduturi Premalatha Devi, resident of Pipri Village, Mudhole Mandal, Nirmal District, Telangana, respectfully submit the following objections as a farmer and Solar Power Generator under PM-KUSUM Component-A in respect of the proposal seeking reduction of the pre-fixed tariff from ₹3.13/kWh to ₹2.98/kWh.

OBJECTIONS

1. I participated in the PM-KUSUM Scheme relying upon the tariff approved by this Hon'ble Commission and proceeded with the project based on the approved commercial and financial conditions.
2. I executed the Power Purchase Agreement (PPA) during June, 2025 and accordingly planned project implementation and commissioning schedule with an expected completion by October, 2025.
3. However, due to circumstances beyond my control, the implementation of the project experienced substantial delay.
4. Considerable time was consumed in obtaining financial assistance and sanction of project loans from financial institutions. As a farmer developer, arranging finance and completing banking formalities caused unavoidable delay.

5. Further, substantial delay occurred in execution and completion of the evacuation line between the Solar Power Generator (SPG) and the concerned Sub-station, including obtaining approvals and completing line-related works.
6. In addition, significant expenditure amounting to approximately ₹4.00 Lakhs to ₹5.00 Lakhs was incurred towards resolution of Right of Way (ROW) issues for execution and completion of evacuation infrastructure.
7. Further, additional expenditure of approximately ₹5.00 Lakhs per kilometer was incurred for execution of the 11 kV line due to use of 13-meter box poles instead of 11-meter PSCC poles and adoption of covered conductor system as required for practical site conditions and execution feasibility.
8. Due to implementation delays, financing constraints, increase in material prices and escalation in construction costs, the total EPC cost of the project has increased substantially and presently stands at approximately ₹7.50 Crores.
9. At the time of fixation of tariff by this Hon'ble Commission, GST applicable to solar equipment was approximately 5%; however, subsequent increase to 12% caused additional financial burden and materially increased project implementation cost.
10. During earlier public proceedings concerning PM-KUSUM projects, stakeholders had already highlighted escalation in project costs and requested appropriate consideration of actual field-level implementation conditions.
11. Further, while annual Operation and Maintenance (O&M) expenses were considered at approximately ₹9.00 Lakhs per annum at the time of tariff determination, the actual annual O&M expenditure has significantly increased and presently ranges between approximately ₹12.00 Lakhs to ₹15.00 Lakhs per annum.
12. Therefore, even assuming any notional financial benefit arising due to changes in taxation or market conditions, such benefit is effectively neutralized by increased O&M expenditure, financing costs, line execution costs, and overall project cost escalation.
13. Farmers and project developers have already structured project financing, repayment schedules, and financial commitments based on the existing tariff of ₹3.13/kWh.
14. Any reduction of tariff after execution of PPA and after substantial investment has already been incurred would severely affect project viability, debt servicing capability, and repayment obligations.
15. Reduction of tariff from ₹3.13/kWh to ₹2.98/kWh at this advanced stage would adversely affect legitimate expectations of farmers who participated in the PM-KUSUM Scheme in good faith based upon the approved tariff framework.

PRAYER

In view of the facts and circumstances stated above, it is most respectfully prayed that this Hon'ble Commission may be pleased to:

- a) Reject the proposal seeking reduction of tariff from ₹3.13/kWh to ₹2.98/kWh;
- b) Continue the existing pre-fixed levelized tariff applicable under PM-KUSUM Component-A;

c) Consider the actual implementation challenges including financing delays, escalation in EPC cost, increased O&M expenditure, evacuation line expenditure, ROW costs and project execution constraints faced by farmers;

d) Protect the financial viability of already approved and invested projects under PM-KUSUM Component-A; and

e) Pass such other order(s) as this Hon'ble Commission may deem fit and proper in the interest of justice.

I therefore humbly request this Hon'ble Commission not to permit any reduction in the PPA tariff, as such reduction at this stage would cause severe financial hardship to me and similarly placed farmers who have already undertaken substantial investment under the Scheme.

Place: Pipri

Date: 30/06/2026

Objector

(Sd/-)

(Smt. Podduturi Premlatha Devi)

Village: Pipri

Mandal: Mudhole

District: Nirmal, Telangana