

To,

The Commission Secretary,

Telangana State Electricity Regulatory Commission (TGERC),

Vidyut Niyantran Bhavan, Kalyan Nagar, G.T.S. Colony, Hyderabad – 500 045.

Email: secy-tgerc@telangana.gov.in

Subject: Objection to the petition (I.A. No. 4 in O.P. No. 24 of 2020) filed by TGSPDCL seeking reduction of the pre-fixed levelised tariff from Rs. 3.13/kWh to Rs. 2.98/kWh under Component-A of the PM-KUSUM Scheme – filed pursuant to the Public Notice dated 23.06.2026.

Particulars of the Objector (Solar Power Generator):

Name of the SPG / Farmer: RAYILI RAJITHA

Application No.: TGPMKUSUM-A/24-25/2527

PPA No. and Date: 16 Date: 09/06/2025

Capacity (MW): 2

Village / Mandal / District: chima muppa/nellikudux/mahabubabad

Mobile No.: 992725019

Respected Sir / Madam,

Being a Solar Power Generator under Component-A of the PM-KUSUM Scheme, bound by a PPA that fixes my tariff at Rs. 3.13/kWh for 25 years, I am directly and adversely affected by the relief sought in I.A. No. 4 of 2026. I place the following objection before this Hon'ble Commission for its kind consideration:

Ground 1: GST Reduction Creates No New Cost Advantage – the Benchmark Was Already Fixed Under a 5% GST Regime

The very premise of the petition is factually incorrect. This Hon'ble Commission fixed the benchmark capital cost of Rs. 3.60 Crore/MW by adopting the MNRE Office Memorandum dated 21.07.2020 for FY 2020-21 (Paras 12 and 68 of the Order in O.P. No. 24 of 2020). During FY 2020-21 the GST on solar equipment was already 5%. The tariff of Rs. 3.13/kWh was therefore never built on a 12% GST structure. GST was 5% up to 30.09.2021, 12% from 01.10.2021, and has now been reduced again to 5% – i.e. it has merely reverted to the very level that prevailed when the benchmark was adopted. The present 'change' therefore yields no new cost advantage and gives no factual or legal basis for any reduction. Given the inflation in equipment, steel, labour, civil works, financing and O&M costs since FY 2020-21, an honest review would justify continuation of the existing tariff or an upward revision – certainly not a cut.

Ground 2: Change in Law Does Not Mean Automatic Tariff Reduction

A Change in Law event requires determination of the actual impact, actual savings and actual financial consequences before any tariff consequence can follow. It does not permit a hypothetical, estimated or assumed reduction. The petition proceeds on an assumed reduction of roughly 7% in capital cost, without establishing the actual saving for any individual project, and is therefore unsustainable.

In the premises, it is prayed that the relief sought in the petition be rejected, the pre-fixed levelised tariff of Rs. 3.13/kWh be retained, and, in the alternative, that no revision be ordered without a comprehensive, project-wise review of all cost parameters.

Yours faithfully,

(Signature)

