



Southern Power Distribution Company of Telangana Limited
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From
Chief Engineer (IPC&RAC),
TGSPDCL, Corporate Office,
6-1-50, 1st Floor, Mint Compound,
Hyderabad – 500 063.

To
The Commission Secretary,
TGERC, Vidyut Niyantan Bhavan,
Sy.No.145-P, G.T.S. Colony,
Kalyan Nagar, Hyderabad 500 045.

Lr No.CE (IPC&RAC)/DE(IPC)/F.MYT/D. No.

4410 /25-26, dt: 09 .01.2026

Sir,

Sub:- TGSPDCL – IPC&RAC – filings made by TGGENCO in the matter of Approval of Additional Capital Cost in respect of (a)New Conveying System and Construction of Space frame structure raw coal storage shed at BTPS vide O.P.No.74 of 2025, (b)Construction of Quarters at KTPS-VII Stage vide O.P 78 of 2025 & (c) Raising of Additional Ash Pond bunds at KTPS V&VI Stages vide O.P.No.75 of 2025 – Comments/suggestions of TGDISCOMs – Submission - Regarding.

Ref:- Public Notice issued by TGGENCO, dated: 19.12.2025.

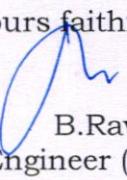
The comments/suggestions of TGDISCOMs in respect of filings made by TGGENCO in the matter of Approval of Additional Capital Cost in respect of the following are hereby submitted for the kind consideration of the Hon'ble Telangana State Electricity Regulatory Commission (TGERC):

- (a) New Conveying System and Construction of Space frame structure raw coal storage shed at BTPS vide O.P.No.74 of 2025.
- (b) Construction of Quarters at KTPS-VII Stage vide O.P 78 of 2025.
- (c) Raising of Additional Ash Pond bunds at KTPS V&VI Stages vide O.P.No.75 of 2025, are hereby submitted for the kind consideration of the Hon'ble Telangana State Electricity Regulatory Commission (TGERC).

Further the additional objections/suggestions (if any) by TGDISCOMs on the aforesaid TGGENCO filings will be submitted during the Public hearing on 20.01.2026.

Encl: As above

Yours faithfully,


B. Ravi
Chief Engineer (IPC&RAC)
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Copy submitted to:
The CE/Coal & Comml./TGGENCO/Vidyuth Soudha
The ED/Comml/TGPCC/Vidyuth Soudha

Copy to: The Chief Engineer/IPC&RAC/TGNPDCL

Annexure - I
Comments on KTPS & BTPS Filings

The comments of TGSPDCL & TGNPDCL on TGENCO KTPS & BTPS Filings are as follows –

Sl. No.	Plant	Para No. in the petition if available	Proposal of the TGENCO as made in the petition	Comments/ suggestions/ objections
1	BTPS	Para 10 of BTPS Additional capitalization petition	<p>In accordance with the Clause No. 22.3 of TGERC regulation 2 of 2023, the capital expenditure, in respect of existing generating station incurred or projected to be incurred beyond the original scope, may be admitted by the commission subject to prudence check.</p>	<p>Clause No. 22.3 of TGERC regulation 2 of 2023 is as follows</p> <p><i>“22.3 The capital expenditure, in respect of existing generating Station or the transmission system, incurred or projected to be incurred on the following counts beyond the original scope, may be admitted by the Commission, subject to prudence check:</i></p> <ul style="list-style-type: none"> <i>(i) Liabilities to meet award of arbitration or for compliance of the order or directions of any statutory authority or order or decree of any court of law;</i> <i>(ii) Change in law or compliance of any existing law; TSERC (MYT) Regulation, 2023 Page 42 of 113</i> <i>(iii) Force majeure events;</i> <i>(iv) Need for higher security and safety of the plant as advised or directed by appropriate Indian Government Instrumentality or statutory authorities responsible for national or internal</i>

Sl. No.	Plant	Para No. in the petition if available	Proposal of the TGENCO as made in the petition	Comments/ suggestions/ objections
				<p>security;</p> <p>(v) <i>Deferred works relating to ash pond or ash handling system in addition to the original scope of work, on case-to-case basis;</i></p> <p>(vi) <i>Usage of water from sewage treatment plant in thermal generating station”</i></p> <p>The proposed construction of Space frame structure raw coal storage shed at BTPS station clearly doesn't come under any of the above 6 cases and hence clause 22.3 is not applicable for the proposal.</p>
2	BTPS	9. Cost benefit analysis of petition	Breakup of Rs. 135.87 Cr	The item wise cost breakup for the project cost may be provided. Additionally, cost of any such Coal storage shed constructed in state or national plants may be provided for comparison.
3	KTPS VII	Para 6.1 of KTPS VII stage petition	Clause 22.2 Deferred works in the original scope of work, up to a maximum period of 2 years after cut-off date, on case-to-case basis.	The COD of KTPS VII stage is 26.12.2018 and the Cut off date is 31.03.2021. As per Clause 22.2 of Regulation 2 of TGERC 2023, the maximum period allowed for deferred works is 2 years after the cutoff date. In case of KTPS stage VII, this allowed period is 31.03.2023. Hence, the current proposal of construction of quarters is not allowed as per clause 22.2 of Regulation 2.