



నార్తర్న్ పవర్ డిస్ట్రిబ్యూషన్ కంపెనీ ఆఫ్ తెలంగాణ లిమిటెడ్
NORTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED

(A Govt. of Telangana Undertaking) CIN:U40109TG2000SGC034119

From
Chief Engineer,
IPC & RAC, TGNPDCL,
Corporate Office, Vidyuth Bhavan,
HANUMAKONDA, WARANGAL

To
The Commission Secretary,
TGERC, Vidyuth Niyrantran Bhavan,
G.T.S Colony, Kalyan Nagar,
Hyderabad-500045

Lr.No.CE(I&R)/GM(I&R)/DE(RAC)/TGNPDCL/WGL/F.17/D.No. 102/26-27, Dt:24.06.2026.

Sir,

SUB :- TGNPDCL/WGL – Responses to the Suggestions and Objections received on the petition of Amendment to the Distribution & Retail Supply License (No. 14 of 2000) of TGNPDCL – Submission – Reg.

REF:- 1. Hon'ble TGERC Public Notice dated 22.05.2026.
2. Objections/Suggestions received from Sri Tuljaram Singh Thakur,
Sri Kiran Kumar Vempati and Smt. M. Laxmi

* * *

Adverting to the references cited above, the responses of TGNPDCL to the objections received from from Sri Tuljaram Singh Thakur, Sri Kiran Kumar Vempati and Smt. M. Laxmi on the petition of Amendment to the Distribution & Retail Supply License (No. 14 of 2000) of TGNPDCL to give effect to the provisions of G.O Ms.No. 44 dated 17.12.2025 and of G.O Ms.No. 4 dated 11.03.2026 are here with Submitted.

Further, it is to inform that the responses of TGNPDCL to the above Objections/Suggestions have been sent to the concerned Stakeholder through registered post with Acknowledgement due and also to their respective e-mail IDs.

Encl: As above

Yours faithfully,

CHIEF ENGINEER
IPC&RAC/TGNPDCL/WGL

Objections and DISCOM Replies on amendment License petition filed on O.P. No. 15 of 2026

2. Replies to Tuljaram Singh Thakur		
శ్రీతులారామసింగ్‌కూర్, రిటైర్డ్‌ఇంజనీర్, 4-9-93, హిమగిరినగర్, అనీ, బండల్గాడజాగీర్, హైదరాబాద్-500 091		
క్రం. సం.	అభ్యంతరం	ప్రత్యుత్తరం
1.	1) వివిధ వర్గాలు, ఉద్యోగ సంఘాలు వెలువరించిన అభిప్రాయాలను, అభ్యంతరాలను పరిష్కరించవల్సిందిగా విజ్ఞప్తి. అందులో అనేక న్యాయపరమైన, సాంకేతిక, ఆర్థిక, ఉద్యోగులకు సంబంధించిన అనేక విషయాలు ఇమిడి ఉన్నది తమరికి విదితమే. క్షేత్రస్థాయిలో అవసరమైన సిబ్బంది నియామకం, మూడో డిస్కంను సమర్థవంతంగా నడిపించడానికి కావల్సిన నిధులను సమకూర్చడం ప్రధానాంశాలు. 12వేల పై చిలుకు విలేజ్ కరెంటు అధికారులను నియమించునున్నట్లు పత్రికల్లో చదివాము. దీనిని ఆహ్వానించదగిన పరిణామంగా భావిస్తున్నాము. అదే సమయంలో మూడో డిస్కంకు ఎలాంటి అప్పులు బదలాయించకుండా కనీసం పదివేల కోట్ల రూపాయల మూలధనం ప్రభుత్వం కేటాయించాలి.	<u>లైసెన్స్ కొరకు దాఖలు చేసిన పిటిషన్ గౌరవ కమిషన్ వారి పరిశీలనలో ఉన్నది. ఈ విషయమై గౌరవ కమిషన్ తగు నిర్ణయం తీసుకొంటుంది.</u>
2.	2) మూడో డిస్కం పరిధిలో వ్యవసాయ కనెక్షన్లు మాత్రమే కాకుండా వ్యవసాయ అనుబంధ పరిశ్రమలకు సంబంధించిన కనెక్షన్లు కూడా చేర్చాలి. డ్రైరీ ఫాంలు, పౌల్ట్రీ ఫాంలు, గ్రామీణ ప్రాంతాల్లోని రైస్ మిల్లులు, చెరుకు/ బెల్లం కషర్లు తదితర వ్యవసాయ అనుబంధ పరిశ్రమలు కూడా ఎక్కువగా వ్యవసాయ ఫీడ్‌బ్యాక్ ఉంటాయి. కాబట్టి వీటిని రైతు డిస్కం పరిధిలోకి చేర్చాలి.	రాష్ట్రంలోని ఐదువర్గాల వినియోగదారులకు ప్రత్యేకంగా సేవలందించేందుకు, మూడవ డిస్కామ్ (DISCOM) అయిన 'తెలంగాణ రైతు పవర్ డిస్ట్రిబ్యూషన్ కంపెనీ లిమిటెడ్' ఏర్పాటుకు సంబంధించి రాష్ట్ర ప్రభుత్వం జారీ చేసిన G.O.Ms.No.44 (తేదీ: 17.12.2026) మరియు G.O.Ms.No.4 (తేదీ: 11.3.2026) లను పరిగణలోనికి తీసుకొని TGSPDCL వారు లైసెన్స్ సవరణకు పిటిషన్ దాఖలు చేయడం జరిగినది. ఈ అంశముపై గౌరవనీయ కమిషను వారు తగు నిర్ణయం తీసుకొంటుంది.

<u>3.</u>	3) మూడో డిస్కం ట్రాన్సిగ్ గ్రాంట్ చేసినట్లయితే ఒకే ప్రాంతంలో బహుళ ట్రాన్సిగ్స్ (Multiple licensees) ఉన్న పరిస్థితుల్లో వినియోగదారునికి కంపెనీని ఎంచుకునే హక్కు ఉండడం న్యాయసమ్మతం కాదా? ఈ విషయాన్ని కమిషన్ వారు పరిశీలించాలి. మూడో డిస్కం రైతులకు మరింత మెరుగైన , నాణ్యమైన సేవలు అందిస్తామని ముందుకొచ్చినారు. ప్రస్తుతం వ్యవసాయరంగానికి ఇరవై నాలుగు గంటలు కాకపోయినా సంతృప్తికరమైన విద్యుత్తు సరఫరా జరుగుతున్నది. ఎక్కడా లో ఓల్ట్ జీ సమస్య, పంటలు ఎండిపోవడం లాంటి సమస్యలు లేవు. భవిష్యత్తులో మూడో డిస్కంలో ఇటువంటి పరిస్థితులే కొనసాగుతాయన్న గ్యారెంటీ ఉండాలి. లేని పక్షంలో రైతులు దక్షిణ / ఉత్తర డిస్ట్రిబ్యూషన్ కంపెనీల ఆధీనంలో తిరిగి రావడానికి కావల్సిన ఆప్షన్ సౌకర్యం కల్పించాలి.	ఈ అంశము గౌరవ కమిషను వారి పరిధిలో వున్నది.
<u>4.</u>	4) గ్రామీణ ప్రాంతాల్లో ప్రస్తుతం 48 గంటల్లో ఫీయిల్ అయిన ట్రాన్స్ఫార్మర్ మార్పడానికి తగిన ఆదేశాలు ఇచ్చియున్నారు. భవిష్యత్తులో కూడా ట్రాన్స్ఫార్మర్ మార్పడానికి కావల్సిన ప్రత్యేక వ్యవస్థను మూడో డిస్కంలో ఏర్పాటు చేయాలి. వ్రాతపూర్వకమైన అభ్యంతరాలలో వివిధ వర్గాలకు చెందిన ప్రజలు, రైతులు, విద్యుత్తు రంగ నిపుణులు, ఉద్యోగ సంఘాలు వెలిబుచ్చిన అభ్యంతరాలన్నింటినీ తగురీతిలో పరిష్కరించేలా తగు ఆదేశాలను జారీ చేసిన తదనంతరం OP నం. 14 మరియు 15 పిటిషన్లను పరిగణనలోకి తీసుకోవాలని గౌరవ కమిషన్ ను ప్రార్థిస్తున్నాను.	ఈ అంశము గౌరవ కమిషను వారి పరిధిలో వున్నది.

3. Response to Kiran Kumar Vempati		
SI No	Summary of Objections/ Suggestions	Response of the Licensee
1	The amendment petitions by DISCOMS are filed towards end of April 2026. Stake holders opinion is also called before TGRPDCL related public hearing. By then and even now also there is no formal approval given to the cited TGRPDCL from the Honorable Commission. Processing this kind of petition in this way could signal that the Honorable Commission has decided to grant DISCOM licence to TGRPDCL even before considering stake holders and public hearing. At first, DISCOM's licence is geographical specific and no provision in Electricity ACT 2003 allows DISCOMs to cater only for some category / set of consumers. TGNPDCL / TGSPDCL could submit the amendment petition for different reason or for no reason too, but citing the reason of existence / incorporation of TGRPDCL, which actually not in existence at the time of filing the petition and even now also, is err. There can be more than one DISCOM catering same consumers at the same time. This is against Section 14 of Electricity Act 2003 which reads as below. "....Provided also that the Appropriate Commission may grant a licence to two or more persons for distribution of electricity through their own distribution system within the same area...." Even as per Electricity Act 2003, Section 18 (2) (b) NOC from Central Government (GoI) is explicitly mandatory to effect amendment. This NOC is not about the consumer status but for existence of Defence structures in the effected geographical area. The petition has no mention of the same and is liable to be returned or called for additional submissions. Granting of or amending licence related to category specific consumers is not suffice. DISCOMS' should take explicit concern from each consumer to transfer them. I believe processing this petition and all related acts (gathering stake holders' opinion etc.,) is unwarranted at this juncture and is inappropriate. The said petition should be rejected. If not should be returned or should be kept in abeyance till there is other TGRPDCL DISCOM existence is confirmed.	It is to submit that the request to grant for license for TGRPDCL is not a standalone matter, but is contingent upon obtaining the necessary clearances and no-objection confirmations from the existing DISCOMs (TGSPDCL and TGNPDCL), as the proposed changes have implications for both the existing DISCOMs and the consumers of TGRPDCL.

4. Response to M. Laxmi, Bowrampet, Hyderabad		
SI No	Summary of Objections/ Suggestions	Response of the Licensee
1	PART I — NATURE AND SCOPE OF THIS OBJECTION The present objection is submitted in response to the public notice inviting comments on applications proposing amendment of distribution licences of TGSPDCL and TGNPDCL to exclude specified consumer categories, and the grant of a separate licence to TGRPDCL for those categories across the State. While the objector does not dispute the State's objective of improving electricity supply to agricultural and allied consumers, the proposed mechanism is opposed on the following grounds: • Ground I (Statutory): Section 18 of the Electricity Act, 2003 does not permit excision of consumer classes and the proposal amounts to an impermissible partial surrender of licence. • Ground II (Statutory): The proposal's reliance on Section 14 and the Capital Adequacy Rules is misplaced, as the proposed entity satisfies neither, rendering the scheme inconsistent; reliance on Section 131 is also contested. • Ground III (Statutory): The Universal Service Obligation under Section 43 is area-based and indivisible, and cannot be restricted by consumer categories. • Ground IV (Operational & Financial): Category-based segregation over a shared network would lead to stranded assets, duplication of infrastructure, and increased costs. • Ground V (Constitutional): The classification lacks rational nexus to the stated objective and is arbitrary under Article 14.	The licensee has followed the due process outlined in section 18 pertaining to amendment of license. Further as per the provisions in Section 131, the proposed changes can be affected through the transfer scheme and is legally valid. Sections 61 and Section 62 are pertaining to the powers of the Appropriate Commission in determination of Tariff. Differentiating consumers into supply categories based on factors outlined in Section 62 is legally valid. The licensee submits that transparent and clearly stated infrastructure sharing arrangements would address the concerns of the objector on network usage. It is submitted that the proposed arrangement of the licensee avoids duplication of the network. Further, Licensee submits that TGRPDCL would cater to agricultural, HWWSS and other government services. All other services would be served by TGSPDCL and TGNPDCL. Hence power requirements of any consumer would be completely met. Licensee submits that proposed amendment to the license condition is not in contravention to Article 14 of the Indian Constitution which is essentially on ensuring equality of all persons.
2	PART II — Statement of Facts: • Telangana is currently served by two DISCOMs — TGSPDCL (15 districts) and TGNPDCL (18 districts) — both obligated to supply all consumers within their respective areas.	The Licensee submits that the points mentioned in the objection may be examined and order may be passed as deemed fit.

	• Government Orders (G.O. Ms. No. 44 dated 17.12.2025 and G.O. Ms. No. 4 dated 11.03.2026) approve and incorporate TGRPDCL as a third DISCOM ("Rythu DISCOM") for specified categories (agriculture, lift irrigation, water supply, etc.) across the State. • TGRPDCL is incorporated with a paid-up capital of Rs. 5 crore, contributed equally by TGSPDCL and TGNPDCL. • Approximately 29.08 lakh consumers (mostly agricultural) are proposed to be transferred to TGRPDCL—the largest consumer base—despite its minimal capital base. • The restructuring involves transfer of: - o ~Rs. 4,929 crore in network assets - o ~Rs. 35,982 crore receivables - o ~Rs. 9,032 crore loans - o ~Rs. 26,950 crore payables to TGRPDCL. • TGRPDCL is not independent, as its management and board are largely shared with existing DISCOMs. • The proposal relies on Section 14 (parallel licensing) and Capital Adequacy Rules, 2005, read with Regulation 4 of 2016. • Operations are targeted from 1 April 2026, with transfer of assets, liabilities, and consumers proceeding alongside (and prior to) final licence approval. • This submission is made in response to the Commission's invitation for objections.	
3	PART III — Ground I: Section 18 Does Not Permit Excision of a Consumer Class: • Section 18 of the Electricity Act, 2003 allows amendment of licence terms, including area of supply, but is limited to modifying geographical or operational aspects. • The present proposal does not amend licence conditions, but removes an entire class of consumers, which amounts to a partial surrender of licence rather than a valid amendment. • The Act provides no provision for such partial surrender of a licence by consumer category; such power cannot be assumed under Section 18. • Past precedents relate only to changes in area or name, where	The licensee submits that as per provisions present in Section 16 of the Electricity Act 2003, Hon'ble Commission may specify any general or specific conditions of license which will apply either to a licensee or class of licensees.

	obligations to all consumers continued; none support exclusion of a consumer class. Accordingly, the applications under Section 18 exceed its scope and are liable to be rejected.	
4	PART IV-A — Section 131 and Section 18: The objector submits that the proposed restructuring is unsustainable, as the Electricity Act establishes an area based licensing framework, and neither Section 131 nor Section 18 permits carving out a consumer class for separate licensing. - IV A.1:Licensing under Sections 14 and 15 is territorial; the Act does not recognise a consumer class exclusive licensee, making the proposed structure unknown to law. - IV A.2:Section 43 continues to bind incumbent DISCOMs; the proposal creates overlapping and conflicting supply obligations for the same consumers. - IV A.3:Section 131 enables transfer of assets and undertakings but does not authorise consumer class fragmentation or alteration of statutory supply obligations. - IV A.4:The Act already provides a lawful route through the franchise model, enabling operational specialisation without disturbing licensing structure. - IV A.5:Accepting category based licensing would allow unrestricted segmentation of consumers, undermining the Act's cross subsidy framework. - IV A.6:The "allocated USO" rationale fails as the scheme splits the physical network, causing inefficiency and stranded assets; Section 18 cannot be used to excise consumer classes, directly or indirectly.	The licensee submits that provisions under section 131 of the Electricity Act gives power to the State Government in affecting structural changes in the sector through transfer scheme. To suit the operational modalities proposed, the licensee submits that Hon'ble Commission may propose conditions of licensing as per provisions in Section 16 of the Electricity Act.
5	PART VI — Ground IV: Stranded Infrastructure & Avoidable Costs: The objector submits that the proposed restructuring creates practical and financial inefficiencies, defeating its stated objective: - Core Issue:The scheme splits ownership of a shared network, transferring agricultural infrastructure to TGRPDCL while incumbents retain supply obligations for other consumers—leaving them without necessary infrastructure. - Mixed Feeder Impact:For new non-agricultural connections near	The licensee submits that the present proposal is designed to avoid stranded infrastructure and duplication of costs. By having suitable infrastructure sharing arrangements, network maintenance and reliable power supply arrangements would be ensured.

	agricultural areas, incumbents must build duplicate infrastructure, despite existing network availability. • Pure Agricultural Feeder Impact: Where only agricultural infrastructure exists under TGRPDCL, incumbents must lay entirely new lines to serve any non-agricultural demand, increasing costs. • Cost Consequences: - o Costs are either passed to consumers (as connection charges), or - o Absorbed by DISCOMs, weakening their financial position. The scheme creates a no-win outcome—higher costs for consumers or utilities—thereby worsening the financial issues it seeks to address and rendering the proposal irrational and unsustainable.	
6	PART VII — GROUND IV (CONTINUED): FRAGMENTATION OF THE SUPPLY OBLIGATION AND THE JURISDICTIONAL VACUUM The same root cause — splitting ownership of a shared network by consumer category — produces a second consequence in law: situations in which a consumer holds a Section 43 right but no licensee can be identified as bound to honour it. This is the “jurisdictional vacuum.” • That after the amendment no single licensee will be capable of discharging the complete Section 43 obligation within its area: TGSPDCL and TGNPDCL will serve all categories except agriculture and allied, and TGRPDCL only agriculture and allied. The obligation will exist in fragments across entities but be whole in none. Illustrative cases in which no licensee owns the obligation: – <i>The converting farmer — an agricultural consumer sets up a cold-storage unit needing a commercial connection at the same premises: TGRPDCL cannot serve the commercial load; the incumbent has been divested of the agricultural assets at that point.</i> – <i>The rural domestic applicant — a new household in a pocket where only TGRPDCL has infrastructure: TGRPDCL’s licence does not extend to domestic consumers; the incumbent has no assets there.</i> – <i>The penalty vacuum — a consumer denied supply seeks the Section 43(3) penalty: each licensee points to the other, and the</i>	It is pertinent to mention that in a recent order issued by one of the Hon’ble SERCs, it is directed that USO in an area of supply will be met by either entities depending upon the category of consumers. Similarly, the licensee submits that USO will continue to be met jointly by the incumbent licensees and TGRPDCL, each serving respective consumer categories.

	<i>statutory remedy is rendered unenforceable.</i> That this fragmentation cannot be cured by inter-licensee arrangements: the Section 43 duty is statutory and personal to each licensee, it cannot be discharged by contractual delegation, the consumer's right runs against a specific licensee, and the Act provides no mechanism for shared or apportioned obligation.	
7	PART VIII — Ground V: Article 14: The objector submits that the proposed restructuring violates Article 14 due to arbitrary classification lacking rational nexus: - Consumers in the same area are divided by category (agricultural vs. others) and assigned to different licensees with unequal financial strength and accountability. - Consumer categories under the Act are relevant only for tariff determination, not for supply obligations; hence, the classification has no link to the objective of universal supply. - As shown in Part VI, the scheme increases costs and worsens DISCOM finances, defeating its stated purpose. - TGRPDCL is not independent (shared management, minimal capital), resulting in consumers being shifted to a weaker entity without corresponding benefit. - Consumers are transferred without consent or hearing, reinforcing arbitrariness.	The licensee submits that proposed restructuring is well within the boundaries of law, prevailing regulations and is not arbitrary move. The objective of the proposed restructuring is to improve quality of supply to agricultural consumer categories and at the same time to improve the financial position of incumbent DISCOMs. The proposed restructuring is well within the provisions outlined in Section 131 of Electricity Act 2003.
8	PART IX — THE TRANSFER IS PROCEEDING AHEAD OF STATUTORY APPROVAL - That the Annexure to G.O. Ms. No. 44 targets commencement of TGRPDCL's operations from 1 April 2026 and directs the incumbent DISCOMs to carry out the segregation of assets, liabilities, and consumers — a timeline that precedes, and is independent of, any determination by this Commission, and that runs ahead of the close of the present objection process itself. - That if the operational transfer is permitted to proceed before the licence applications are heard and decided, the statutory process under the Electricity Act, 2003 will be reduced to a post-facto formality, and the fragmentation described in Part VII will become entrenched and practically irreversible before this Commission has ruled.	It is to submit that the final timelines will be subject to approval from the Hon'ble Commission. Further, the G.O. outlines only the proposed modalities of transfer, and their implementation will be undertaken only after the issuance of the requisite license by the Hon'ble Commission.

9	PART X — WHAT A COMPLIANT RESTRUCTURING WOULD REQUIRE The objector does not oppose dedicated attention to agricultural supply. Any restructuring, however, must at a minimum satisfy the following to be lawful: • Every licensee must remain capable of serving any person in its area of supply, so that no consumer at any time falls into a jurisdictional vacuum. • TGSPDCL and TGNPDCL must retain a concurrent Section 43 obligation toward agricultural and allied consumers as a statutory safety net, so that every consumer always has an identifiable, accountable licensee. • If TGRPDCL is to be licensed at all under the proviso to Section 14, it must be licensed as a full-service area licensee capable of serving any person — not as a category-restricted entity. • The incremental segregation cost (the additional 11kV lines, DTRs, and interface metering identified in Part VI) must be quantified and its incidence (consumer versus DISCOM) disclosed before any licence is granted. • TGRPDCL's financial viability must be demonstrated by independent assessment satisfying the 30% equity and creditworthiness norms, not asserted; and Consumer Grievance Redressal Forums and the Electricity Ombudsman for the transferred consumers must be operational before, not after, any transfer.	The key objectives of establishing an Agriculture-focused DISCOM such as improving transparency through the separation of costs and losses and enhancing focus on the agricultural sector can be effectively achieved under the proposed framework with select consumer categories allocated across the DISCOMs.
10	PART XI — PRAYERS In the premises, the objector respectfully prays that this Hon'ble Commission be pleased to: Prayer A — On Section 18 Reject the applications of TGSPDCL and TGNPDCL under Section 18 of the Electricity Act, 2003, on the ground that Section 18 affords no power to excise a class of consumers from a licensee's obligations and that what is sought is, in substance, a partial surrender of licence unknown to the Act. Prayer B — On the Section 14 / Capital-Adequacy Contradiction Hold that a category-restricted entity cannot be licensed under the proviso to Section 14, which requires a parallel licensee capable of	The responses to the aforementioned objections have been addressed in the preceding sections and the Licensees will abide by the directions of the Hon'ble Commission.

serving any person in the area; and that TGRPDCL, with paid-up equity of Rs. 5 crore against liabilities of the order of tens of thousands of crores, does not satisfy the 30% equity and creditworthiness requirements of the Capital Adequacy Rules, 2005 and Section 12 of Regulation 4 of 2016. Prayer B-A — On Section 131 Hold that Section 131 of the Electricity Act, 2003 affords no foundation for the proposed restructuring: a statutory transfer scheme is subordinate to the Act and cannot achieve what Sections 14, 16 and 18 reserve to this Commission, nor dilute the duty imposed by Section 43; that the carve-out of a consumer class requires a licence amendment which Section 18 does not permit, and cannot be effected by a \u201Cdeemed\u201D amendment said to flow from a transfer scheme; and that the contention that the obligation is merely \u201Callocated\u201D and not diluted is unavailable here, because the present scheme transfers the distribution network itself to TGRPDCL and so fragments supply physically, rather than leaving a unified network in the incumbent\u2019s hands. Further hold that any approval of a co-ordinate authority sanctioning a differently-structured, retail-only restructuring is distinguishable and non-binding, and is no authority for the network-splitting, category-restricted scheme now proposed. Prayer C — On Section 43 Declare that the Universal Service Obligation under Section 43 is area-based, person-centric, and indivisible, attaching to every person within the area of supply irrespective of consumer category; and that consumer categories are instruments of tariff under Sections 61–62, not filters on the duty to supply. Prayer D — On Avoidable Cost and Disclosure Direct that the applicants quantify and place on record the incremental capital cost of network segregation arising from the proposed category-based ownership — including additional 11kV lines, DTRs, and interface metering — together with its incidence as between the consumer and the DISCOM; and decline to approve a restructuring whose chosen mechanism adds avoidable cost and worsens the financial position it is said to remedy.	
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Prayer E — On Article 14 Declare that the classification of consumers by category for the purpose of supply obligation has no rational nexus to the object of universal electricity supply, and is arbitrary and violative of Article 14 of the Constitution of India. Prayer F — On Concurrent Obligation Direct that TGSPDCL and TGNPDCL shall retain their concurrent and undiminished obligations under Section 43 toward all consumers, including agricultural consumers, within their respective areas of supply, as a statutory safeguard, notwithstanding any licence granted to TGRPDCL. Prayer G — On Financial Viability and Grievance Redressal Direct that no licence be granted to TGRPDCL and no transfer of consumers, assets, or liabilities be effected until TGRPDCL demonstrates financial viability by independent assessment, and until Consumer Grievance Redressal Forums and the Electricity Ombudsman for the transferred consumers are fully constituted and operational. Prayer H — On Premature Transfer Direct that no transfer of consumers, assets, or liabilities, and no commencement of operations by TGRPDCL, shall take place unless and until the licence applications are heard and decided on merits by this Hon'ble Commission. Prayer I — General Pass such further orders as this Hon'ble Commission may deem fit in the interest of consumers and in consonance with the Electricity Act, 2003 and the Constitution of India.	
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