Telangana Rythu Power Distribution Company Limited (TGRPDCL)

Responses to Objections / Suggestions

On

Licensee Application

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7.	**M. Thimma Reddy,** Convenor, People's Monitoring Group on Electricity Regulation, H. No.3-4-107/1, Plot No. 39, Radha Krishna Nagar, Attapur, Hyderabad – 500 048	26
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Response to RV Subba Rao		
1.	The Government of Telangana has issued GO Ms. No. 44 dated 17.12.2025, proposing the formation of a Third Distribution Company — Telangana Rythu Power Distribution Company Limited (TGRPDCL) — to supply electricity exclusively to subsidized consumer categories comprising Agriculture, Lift Irrigation Schemes (LIS), CPWS/Mission Bhagiratha, HMWSSB and Municipal Water Connections (LT VI-B). A licence application has been filed before this Commission vide O.P. No. 11 of 2026, and a Public Notice has been issued calling for objections and suggestions. While the stated objective of ring-fencing subsidized supply may appear reformative, it is respectfully submitted that the proposal as currently structured is technically weak, financially risky, operationally impracticable and legally ambiguous. It does not address the root causes of DISCOM financial distress and may ultimately impose a greater burden on consumers and the State exchequer. These objections are therefore filed in the interest of prudent regulation and long-term sector sustainability.	It may be noted that financial distress of DISCOMs is largely a systemic concern across India, TGRPDCL submits that the proposal is a focused structural reform to address the root cause of distress of TGDISCOMs TGRPDCL submits that the purpose is to improve the financial stability of all three DISCOMs. TGRPDCL's revenue gap will be met through timely government subsidy releases, which will establish creditworthiness of TGRPDCL. At the same time, SPDCL and NPDCL gain financial space to access schemes like RDSS and undertake system upgrades. It is further submitted that the proposal will not impose any additional burden on consumers. On the contrary, consumers are expected to benefit from improved quality and reliability of supply enabled through focused infrastructure development, better operational responsiveness due to dedicated service structures, and enhanced grievance redressal mechanisms. In this regard, TGRPDCL proposes to establish two Consumer Grievance Redressal Forums (CGRFs) to ensure prompt and effective

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		resolution of consumer issues, thereby strengthening consumer interface and improving overall service standards.
2.	The erstwhile Andhra Pradesh State Electricity Board (APSEB) functioned as a single integrated utility handling generation, transmission and distribution. The integrated structure ensured unified planning, coordinated operations and clear accountability at all levels. APSEB was subsequently vertically unbundled into GENCO, TRANSCO and DISCOMs under the reform process. While the intention was to improve operational efficiency and reduce losses, the practical outcome included: • Multiplication of corporate structures and duplication of administrative establishments; • Increased overhead and management expenditure without proportionate efficiency gains; Weakened field-level accountability due to fragmented jurisdictions; • Persistent financial stress, accumulating regulatory gaps, and growing subsidy dependence. This experience conclusively demonstrates that structural bifurcation alone does not resolve operational or financial deficiencies unless supported by strong governance, enforceable financial discipline and credible operational reforms. The present proposal for a further round of bifurcation creating a third DISCOM out of the existing two must therefore be subjected to the most rigorous regulatory scrutiny.	TGRPDCL submits that the present proposal is not another structural division but a targeted and purpose-driven restructuring aimed at addressing specific operational and financial issues. The proposed model clearly defines the allocation of assets, liabilities, power procurement, and operational responsibilities as per G.O. Ms. No. 44 dated 17.12.2025 and G.O. Ms. No. 8 dated 8.05.2026 ensuring better clarity and accountability. This clear demarcation ensures strong governance, financial discipline, and clear operational focus. The objective is to achieve practical and measurable improvements in efficiency and financial stability, rather than creating fragmentation.
3.	FUNDAMENTAL LEGAL DEFICIENCY: ABSENCE OF AN	TGRPDCL would like to submit as follows –

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	INDEPENDENT DISTRIBUTION SYSTEM This is the most fundamental legal objection to the present licence application. Section 14 of the Electricity Act, 2003 permits the Commission to grant a distribution licence to two or more persons in the same area of supply, but the statute expressly conditions such grant on each licensee distributing electricity through its own distribution system. The operative phrase is "distribution of electricity through their own distribution system within the same area." The Distribution Licence issued in Telangana defines a Distribution System as: "any system consisting mainly of cables, service lines and overhead lines, electrical plant and meters having a design voltage of 33 kV and under, and shall also include any other system of higher voltage as the Commission may specifically recognise. A Distribution System shall not include any part of the Transmission System." This definition confirms that a licensee must have an independent, self-owned distribution system as a prerequisite for licence grant. In the present case, the applicant TGRPDCL has not demonstrated the existence of any independent distribution network of its own at the time of application. The licence application itself acknowledges that the proposed entity is a newly incorporated company with equity of only ₹5 Crores, no credit rating, no standard borrowal account, and that its debt arrangements are "yet to be tied up." The application also states that managerial and operational capability will be "deployed" from TGSPDCL	TGRPDCL is intendedto serve agricultural and other allied categories as outlined in the GOMs No 44. It may be noted that DISCOM to serve agri and allied consumer categories is a pioneering step adopted by GoTG. As per the GOMs No 44, identified network infrastructure would be transferred to TGRPDCL. Hence, these distribution network assets would be owned by TGRPDCL. These network assets will enable TGRPDCL in fulfilling the obligations of a Distribution Licensee. It is further submitted that the proposed arrangement is not the creation of a parallel or overlapping network but a structured reallocation of existing distribution assets, with clear demarcation of consumer categories and service obligations. Such restructuring is intended to enhance operational focus, improve service delivery to the agricultural segment, and ensure better accountability.

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	and TGNPDCL, confirming that the proposed licensee lacks independent operational infrastructure. What the GO proposes is a downstream asset transfer of Agricultural DTRs and LT lines to TGRPDCL after a future "effective day." However, as of the date of filing of the licence application, this transfer has not been completed; no audited asset transfer scheme has been filed before the Commission; no independent network has been established. The proposed arrangement, in substance, is not a parallel distribution network but a reallocation of an existing network that remains operationally intertwined with the incumbent DISCOMs. It is therefore respectfully submitted that the licence application is legally premature. The Commission cannot grant a distribution licence merely on the basis of a future intention to create a network; the applicant must demonstrate actual ownership and operability of an independent distribution system at the time of grant. Without this, the fundamental statutory condition of Section 14 remains unsatisfied.	
4.	UNIVERSAL SUPPLY OBLIGATION UNDER SECTION 43 CANNOT SUBSTITUTE FOR INDEPENDENT NETWORK Section 43 of the Electricity Act, 2003 imposes a universal supply obligation on every distribution licensee to supply electricity on demand to any consumer within its area of supply, subject to technical and operational requirements. This is a duty imposed consequent to the grant	Universal supply obligation has been mandated in Electricity Act 2003, in order to ensure no consumer is denied power supply by a Distribution licensee, citing remote conditions or infeasibility in supply of power. In the current scenario, TGRPDCL has been specifically formed to cater to power supply to all agricultural consumers and allied

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	of a licence, not a justification for the grant of a licence. It is submitted that this duty presupposes the existence of a valid, operational licensee with its own infrastructure, financial capacity and technical means to discharge the obligation. Section 43 cannot be invoked by an applicant that does not yet have an independent distribution system, to argue that it must be licensed so that it can thereafter fulfil its supply obligation. The logical sequence is: independent network first, licence grant next, and supply obligation thereafter. Reversing this sequence licensing first and network creation later would reduce the statutory framework to a mere formality. Accordingly, TGRPDCL cannot rely on the universal supply obligation to justify licencing when the basic prerequisite of an own distribution system is not satisfied. The Commission may clearly hold that Section 43 cannot be used as a cure for non-compliance with the independent-network requirement of Section 14.	consumers, some of them may be located remotely and difficult to serve. TGRPDCL will operate in accordance with licensee conditions notified by the Hon'ble Commission.
5.	CAPITAL ADEQUACY AND CREDITWORTHINESS NOT ESTABLISHED The Distribution of Electricity Licence (Additional Requirements of Capital Adequacy, Creditworthiness and Code of Conduct) Rules, 2005 prescribed by the Central Government require every applicant seeking licence in an area already served by an existing licensee to demonstrate 30% equity on the total cost of investment, based on net worth and internal resource generation of the preceding three years.	In accordance with G.O.Ms.No.44, the capital adequacy requirement is proposed to be met through additional equity infusion as required. Identified network infrastructure as per GO is being transferred to TGRPDCL. CAPEX requirements for meeting the new connection growth would be detailed as part of business plan submission. The government may infuse additional equity on need basis for

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	The present application discloses a net worth of ₹5 Crores and states that debt is "yet to be tied up." No credit rating certificate has been furnished. No standard borrowal account status has been provided. No financial projections for even one year have been submitted. The Business Plan is stated to be deferred to within three months of licence coming into force. The magnitude of the proposed entity — serving 29,08,138 consumers, absorbing assets worth ₹4,929 Crores, inheriting government receivables of ₹35,982 Crores, and taking over payables to TGGENCO of ₹26,950 Crores makes the equity base of ₹5 Crores not merely inadequate but grossly incompatible with the capital adequacy standard. The Commission may direct production of a full capital adequacy computation, audited balance sheet, and proof of financial closure before proceeding further.	operations of TGRPDCL.
6.	STRUCTURAL DEFECT: CREATION OF DISPROPORTIONATELY SUBSIDY-DEPENDENT UTILITY The proposed TGRPDCL will serve only subsidized and near-zero-tariff consumer categories. Its entire consumer base Agriculture, LIS, CPWS/Mission Bhagiratha, HMWSSB and LT VI-B water works consists of categories for which either zero tariff or very low tariff is presently applicable. As a result, TGRPDCL will have negligible internal revenue and will depend entirely on State Government subsidy for its financial survival.	TGRPDCL submits that while it serves subsidized consumer categories, the GoTG has committed to ensuring timely subsidy releases to maintain financial viability. Section 65 of the Electricity Act, 2003 mandates that subsidy must be paid in advance, which will ensure the financial viability. The concern that restructuring will create subsidy-dependent utilities overlooks the fact that Government support is already essential for supplying power to sectors like agriculture and drinking water. The proposed model improves clarity and accountability in providing such support, instead of spreading it

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		across entities. Regarding impact on Incumbent DISCOMs TGSPDCL and TGNPDCL, the PPA allocation and asset/liability transfer will be structured to ensure financial sustainability for all three DISCOMs as per G.O.Ms.No.8 dated 08.05.2026. Therefore, TGNPDCL will not weaken further, but will gain access to critical infrastructure initiatives, which will support and improve its overall performance.

Parameter	Value
Total consumers to be transferred	29,08,138
Agriculture consumers	29,05,779 (99.9%)
3rd DISCOM share of total State energy	42% (~31,355 MU per annum)
Agricultural DTRs to be transferred	5,22,479
Agricultural LT lines to be transferred	2,61,240 km
Asset book value to be transferred	₹4,929 Crores
DT metering CAPEX proposed	₹1,306 Crores
Government receivables to be transferred	₹35,982 Crores
TGGENCO payables to be transferred	₹26,950 Crores
Working capital loan to be transferred	₹9,032 Crores
Equity disclosed in licence application	₹5 Crores

Such a utility, consuming 42% of total State energy but generating negligible tariff revenue, is structurally unviable without guaranteed, advance and legally enforceable subsidy from the Government. Section 65 of the Electricity Act, 2003 requires subsidy to be paid in advance in the manner specified by the Commission. The GO does not disclose any escrow arrangement, letter of credit, legislative budgetary commitment or other enforceable mechanism for advance subsidy payment. This is a critical statutory gap.

Further, while TGSPDCL may become financially healthier after bifurcation due to its better consumer mix and urban industrial base, TGNPDCL — which is predominantly rural and agricultural — will also suffer further weakening. The restructuring will thus create one DISCOM with improved finances, while two DISCOMs become chronically subsidy-dependent. This is contrary to the stated objective of sector-wide financial sustainability.

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7.	ROOT CAUSES OF DISCOM FINANCIAL STRESS NOT ADDRESSED The proposal does not address the underlying causes of DISCOM financial distress, which are well-established and include: • Non-payment / delayed payment of electricity dues by Government departments, Local Bodies, Municipalities, Panchayat Raj institutions, Water Works and public undertakings; • Delay or non-release of committed subsidy amounts, resulting in working capital burden and interest accumulation; • Tariff suppression and non-approval of cost-reflective tariff revisions, resulting in a widening regulatory gap between Average Cost of Supply (ACoS) and Average Billing Rate (ABR); • High AT&C losses and inadequate loss reduction due to weak energy auditing and poor feeder-level accountability; • Shortage of field-level O&M manpower leading to delayed service restoration and poor consumer service; • Imprudent power procurement and absence of payment security frameworks. Unless these root causes are addressed through enforceable regulatory directions and policy reforms, creation of a new corporate entity will only redistribute the same inefficiencies, while increasing overheads and administrative expenditure. The Commission may direct that root-cause reforms — including strict Government bill payment discipline, advance subsidy release, and tariff rationalisation — be implemented as a	TGRPDCL submits that one of the intended outcomes of the proposal is to improve the financial stability of all three DISCOMs. TGRPDCL's revenue gap will be met through timely government subsidy releases. At the same time, SPDCL and NPDCL gain financial space to access schemes like RDSS and undertake system upgrades. This will improve the operational parameters AT&C Losses, gap between ACoS and ABR. Power purchase cost allocation will be done in such a way that it will ensure the financial sustainability of all three DISCOMs and maintain uniform tariffs across state level. TGRPDCL submits that the proposed staffing plan has been designed after considering the spread of agricultural consumers, network length, and geographical conditions. The structure proposed in the G.O.Ms.No.44, dated 17.12.2025 ensures proper supervision. The 1,000 O&M staff and artisans will be allocated based on actual field requirement. In addition, TGRPDCL proposes to establish two Consumer Grievance Redressal Forums (CGRFs), which will provide a dedicated and accessible mechanism for addressing consumer issues. Such allocation will facilitate timely fault identification and resolution, enhance maintenance practices, and significantly improve the quality of supply and service to agricultural and allied

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	precondition for any structural restructuring. It is pertinent to note that states like Haryana have demonstrated measurable improvement in DISCOM financial performance through strict enforcement of Government payment discipline and collection efficiency, without creating new structural entities. Such targeted reforms are more effective and far less costly than corporate bifurcation.	consumers.
8.	DUPLICATION OF CORPORATE AND O&M STRUCTURES WILL INCREASE COST BURDEN Formation of TGRPDCL will necessarily result in duplication of corporate functions and O&M infrastructure, including: • Corporate functions such as HR, accounts, legal, IT systems, regulatory filing, procurement and audit; • O&M infrastructure including DT repair workshops, spare parts depots, logistics chains, vehicles, cranes and hydra units; • Call centres, consumer complaint management systems and field grievance redressal machinery; • Safety and enforcement functions including anti-theft and vigilance teams. This duplication will significantly increase overall sector overheads, which will ultimately be recovered through consumer tariffs or Government subsidy. Consumers should not be made to bear the cost of administrative	TGRPDCL submits that the proposal is not intended to create parallel or redundant infrastructure, but to enable better organisation, focused operations, and improved accountability, particularly for agricultural and allied consumer categories. Wherever possible, existing infrastructure, manpower, and systems will be utilized through infrastructure sharing agreements. This will avoid additional cost burden. In addition, consumer-facing mechanisms, including the establishment of two Consumer Grievance Redressal Forums (CGRFs), which will provide an accessible and dedicated platform for timely resolution of consumer issues are planned to established. This will enhance service delivery without requiring disproportionate increase in administrative structures. Further, all costs incurred by TGRPDCL will be disclosed as part of ARR filings and subjected to scrutiny by the Hon'ble Commission.

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	duplication in the absence of guaranteed service improvement outcomes.	This provides an additional regulatory safeguard to ensure that no undue burden is passed on to consumers.
9.	MANPOWER SHORTAGE AND SERVICE DELIVERY RISK IN RURAL AREAS Existing DISCOMs already suffer from significant shortage of O&M field staff in rural areas. In practice, LT maintenance is inadequate, fuse-off restoration is delayed, DT failures during summer and kharif seasons are frequent, and consumers themselves often replace fuses and report only major breakdowns. Further fragmentation of the distribution structure through creation of a third DISCOM will aggravate coordination issues and dilute accountability. In a bifurcated system, complaints may go unanswered due to jurisdictional disputes between DISCOMs. The proposed force of only 2,000 employees for a jurisdiction covering 5,22,479 DTRs spread across 18+ districts of Telangana is manifestly insufficient and will not support reliable service delivery.	TGRPDCL submits that the proposed staffing plan has been designed after considering =the structure proposed in the G.O.Ms.No.44, dated 17.12.2025 to ensure proper supervision. The 1,000 O&M staff and artisans will be allocated based on actual field requirement. In addition, TGRPDCL proposes to establish two Consumer Grievance Redressal Forums (CGRFs), which will provide a dedicated and accessible mechanism for addressing consumer issues. Such allocation will facilitate timely fault identification and resolution, enhance maintenance practices, and significantly improve the quality of supply and service to agricultural and allied consumers.
10.	SERVICE CONTRACT MODEL CREATES ACCOUNTABILITY AMBIGUITY The GO proposes that absorbed/deputed staff will be used optimally and remaining services will be outsourced through service contracts with incumbent DISCOMs. This arrangement creates fundamental ambiguity	TGRPDCL submits that there will be no ambiguity in responsibilities. All inter-DISCOM arrangements will be clearly defined through formal Service Level Agreements (SLAs) with TGSPDCL and TGNPDCL. These agreements will specify roles, fault response timelines,

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	on consumer-facing responsibilities: • Which DISCOM will respond to fuse-off complaints at an agricultural DTR? • Who will replace a failed transformer at an LIS or HMWSSB connection? • Who will maintain LT lines and attend to voltage complaints? • Which DISCOM will handle theft cases, energy auditing and vigilance on agricultural feeders? • Which officials will represent the licensee at ZP/Mandal review meetings and with District Collectors? • How will consumer grievance redressal channels be organised across three DISCOMs? Such ambiguity is unacceptable in a distribution licence framework. Service contracts between DISCOMs do not constitute a substitute for clear statutory accountability. The Commission should require a detailed, enforceable inter-utility service agreement covering fault restoration timelines, liability, penalty provisions, and consumer grievance routing as a mandatory pre-condition for licence grant.	maintenance responsibility, grievance handling, and accountability mechanisms. TGRPDCL will remain the single point of responsibility for consumers under its jurisdiction, with clear operational coordination in place. The SLAs will be placed before the Commission, ensuring full clarity, enforceability, and accountability. Additionally, TGRPDCL proposes to establish two Consumer Grievance Redressal Forums (CGRFs), which will provide a dedicated and accessible mechanism for addressing consumer issues. TGRPDCL submits that, it will be single, accountable distribution licensee for all consumers within its jurisdiction.
11.	DT METERING: NON-COMPLIANCE WITH CEA REGULATIONS AND PROVEN OPERATIONAL FAILURE The GO proposes to use smart meters installed at the LT side of Distribution Transformers (DTRs) as interface meters for energy settlement between DISCOMs. This proposal is technically non-compliant	TGRPDCL submits that Transformer Monitoring Units (TMUs) will be installed after grant of licence, TGDISCOMs would be following the standard energy accounting measures and Hon'ble TGERC approved methodology for assessment of agricultural sales until then.

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	and operationally imprudent on two independent grounds. First, under the CEA (Installation and Operation of Meters) (Amendment) Regulations, 2019, interface meters are required to be of 0.2S accuracy class. The GO itself acknowledges this requirement. However, 0.2S accuracy class smart meters on the LT side of distribution transformers are not standardly manufactured or commercially available at scale in India. The meters typically available and deployed at DTR level are of 0.5 class. This is a direct regulatory contradiction — the GO proposes an interface metering arrangement that cannot be fulfilled with commercially available equipment. It is pertinent to mention that most of the existing distribution transformer (DT) structures and plinths in the field are not compatible for fixing DT meters, CT/PT arrangements, meter boxes, sealing provisions, and safe mounting arrangements. Therefore, DT metering implementation will inevitably require additional civil and structural modifications, resulting in further avoidable expenditure. Thus, the present approach reflects a clear tendency of repeating expensive experiments without learning from previous failures, while consumers and taxpayers are expected to bear the burden of such unplanned and poorly executed initiatives Second, DT-level metering has been attempted multiple times in Telangana and across India under RAPDRP, IPDS, HVDS and ISI methodology programmes. None of these initiatives delivered accurate,	TGRPDCL submits that the tender process for installing Transformer Monitoring Units on agricultural DTRs will be initiated promptly upon grant of the licence. The learnings from DT metering roll-out across different states in the country will be studied and suitable model for implementation would be adopted by TGRPDCL. Accordingly, the modalities will be finalized for roll-out. Such a process will enable in reducing operational risks pointed out by the objector and in achieving efficiencies.

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	sustained and audit-worthy energy accounting due to the following persistent operational failures: • High meter failure rates due to voltage fluctuations, lightning and physical stress; • Theft, tampering and bypass of meters by anti-social elements; • Communication failures due to absence of reliable cellular/GPRS connectivity in deep rural areas; • CT ratio mismatches, wiring errors and software integration issues at time of installation; • Absence of adequate spares and replacement inventory at section level; • Shortage of trained manpower for periodic testing, calibration and replacement. Deploying smart meters on 5,22,479 DTRs at a cost of approximately ₹1,306 Crores (at ₹25,000 per meter), plus MDMS integration and communication costs, represents a major imprudent CAPEX outlay without historical precedent of success. The Commission may reject this expenditure as imprudent and direct adoption of the feeder/village boundary metering alternative detailed in Section 18 below. Further, it is relevant to highlight that TGSPDCL has already attempted implementation of a so called Smart Grid project in Jeedimetla ubdivision, with an investment of around ₹30 Crore under IPDS, involving installation of feeder meters, DT smart meters, and consumer smart meters with the	

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	objective of online energy accounting, monitoring, reliability improvement, and loss reduction. However, even after spending such substantial public funds, the project has practically failed, and the outcome was never effectively communicated to the public or stakeholders. At present, the project is reportedly not in operation, clearly demonstrating that the DISCOM does not possess the required technical capacity, manpower skill, communication infrastructure, and operational discipline even to successfully sustain a Smart Grid initiative in a limited town subdivision area. The smart meters and communication system failed to function reliably, thereby defeating the very purpose of real-time monitoring and energy auditing. More importantly, TGSPDCL has never disclosed any measurable benefits or achievements from this project, such as reduction in AT&C losses, improvement in billing efficiency, enhancement in reliability indices, or reduction in transformer failures. Neither any performance report nor any verified loss reduction data has been placed in the public domain or before the Commission, which raises serious concerns about transparency and accountability in such costly pilot schemes.	
12.	DT METER PROCUREMENT AND MDMS INTEGRATION: PRACTICAL INFEASIBILITY Procurement, supply, installation, testing, commissioning and MDMS integration of over five lakh DT meters is a logistically complex task that will realistically require 18 to 24 months even under the best procurement	TGRPDCL submits that the DTR metering will be executed in a phased and systematic manner, with due consideration of the logistical challenges involved. The tender for metering will be structured to include integration, communication infrastructure, and ongoing maintenance support.

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	conditions. Integration will require adoption of multiple communication modes — GPRS, RF mesh, PLC — given variable rural connectivity, involving coordination with multiple telecom operators across 18 districts. Non-communication events, data gaps, meter replacements and software reconciliation will render energy audit trails unreliable and legally contestable, undermining the core objective of ring- fencing agricultural consumption. By contrast, feeder-level boundary metering requires only approximately 12,000 to 15,000 meters, can be implemented within 3 to 4 months in secured substation environments, and is technically proven as an energy accounting methodology.	The detailed procurement and implementation plan will be submitted to the Hon'ble Commission as part of the business plan.
13.	AGRICULTURAL CONSUMPTION CONTINUES TO BE ESTIMATION-BASED Agricultural energy consumption in Telangana is currently assessed through estimation norms based on connected pump capacity, assumed hours of use, seasonal factors and sample surveys — not direct metering. Even after formation of TGRPDCL, this estimation-based methodology will continue unless credible feeder segregation and boundary metering is implemented, because DT meters alone — vulnerable to failures and communication gaps as detailed above — cannot deliver an audit-worthy real-time measurement chain. Therefore, the primary policy objective of accurately ring-fencing agricultural subsidy consumption will remain defective under the proposed	TGRPDCL submits that until installation of Transformer monitoring Units is fully completed, the existing energy accounting methodology and subsidy computation in coordination with the incumbent DISCOMs will continue as permitted by the Hon’ble Commission

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	model. The Commission may direct that agricultural consumption measurement methodology must first be validated through a pilot-based feeder segregation programme before any physical corporate segregation is attempted.	
14.	The GO does not specify any enforceable mechanism to ensure timely release of subsidy to TGRPDCL. Section 65 of the Electricity Act, 2003 mandates that subsidy must be paid in advance in the manner specified by the Commission. The application is entirely silent on this requirement. If subsidy is delayed — which has historically been the pattern in Telangana — TGRPDCL will face an immediate cash flow crisis, resulting in default on power purchase payments. Such defaults will be reported on the PRAAPTI portal, triggering scheduling restrictions, denial of power exchange access, and potential curtailment of agricultural and LIS supply. This defeats the very welfare objective for which the entity is being created. The Commission may therefore mandate, as a precondition for licence grant, an irrevocable mechanism for advance subsidy payment — such as a dedicated escrow account, a Governmentbacked letter of credit, or a statutory first-charge commitment on the Consolidated Fund of Telangana — in a form and manner specified by the Commission under Section 65.	TGRPDCL submits that subsidy support will continue to be governed under the existing regulatory framework, wherein the ARR is filed, and the approved subsidy requirement is clearly determined and communicated by the Commission. The Government has been consistently supporting subsidized categories, and timely release of subsidy will be ensured in line with these approvals. This provides the necessary financial support for TGRPDCL to meet its obligations
15.	PPA REALLOCATION AND FIXED CHARGE LIABILITY: SERIOUS UNRESOLVED AMBIGUITY	As per the latest GO, G.O.Ms.No.8 dated 08.05.2026, the allocation of PPAs between the three Distribution companies of

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	The GO proposes splitting existing PPAs among the three DISCOMs in proportion to energy requirement (TGSPDCL 45%, TGNPDCL 13%, TGRPDCL 42%). However, several critical issues remain unresolved: • No source-wise PPA allocation statement has been filed indicating which specific contracts — TGGENCO, CGS, IPPs, inter-state solar, inter-state hydel, intra-state RE — will be allocated to TGRPDCL; • Generator consent requirements under existing PPA terms, and whether novation or amendment is required, have not been addressed; • Agricultural and LIS supply is subject to scheduling restrictions by SLDC during peak hours. If energy allocated to TGRPDCL is backed down or diverted, the liability for fixed capacity charges must be clearly assigned to avoid financial disputes between the three licensees; • Payment security obligations under individual PPAs and their assignability to a new unlicensed entity have not been disclosed. Without a legally binding, source-wise PPA allocation — approved by all stakeholders including generators and SLDC — TGRPDCL cannot be treated as a viable power-procuring entity. The Commission should require a complete PPA allocation framework before licensing proceeds.	Telangana namely TGRPDCL, TGSPDCL and TGNPDCL shall be done in such a manner that a higher share of Renewable Energy is allotted to TGRPDCL since the demand profile of consumers transferred to TGRPDCL also aligns with the generation pattern of Renewable Energy sources. It may also be noted that hydro plants would also be allocated to TGRPDCL. This will enable in meeting the LIS requirements. Any surplus or deficit at the individual DISCOM level will be balanced through D-to-D sales or purchases and banking arrangements. Fixed charge liabilities will rest with the respective DISCOMs as per allocated PPAs. This approach will ensure efficient utilization of the power mix. Backing down will occur only when there is excess at the state level, not because of TGRPDCL's allocation. This ensures efficient utilization of the power mix.
16.	ASSET TRANSFER, LIABILITIES AND RECEIVABLES: ABSENCE OF AUDITED DISCLOSURE	The actual value of assets, liabilities and receivables transferred would be as on the date of transfer. These figures will be part of the audit process.

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	The GO proposes transfer of assets, liabilities, receivables and loans to TGRPDCL. However, no audited statements have been filed before the Commission. The Commission cannot make a prudence assessment on the basis of provisional figures. The following are critical gaps: • The average asset value per DT is ₹78,749 in TGNPDCL but only ₹33,452 in TGSPDCL — a variance of over 135%. This wide discrepancy in valuation methodology for essentially similar rural distribution assets is unexplained and must be reconciled through an independent technical and financial audit before assets are transferred; • Government receivables of ₹35,982 Crores are being transferred as assets, but their recoverability and collectability timeline are entirely uncertain. Treating disputed and long-overdue Government dues as bankable assets inflates the balance sheet without genuine financial backing; • The loan transfer formula (Network Value Transferred) + (Government Receivables Transferred) − (Payables Transferred) may result in a technically zero-net-worth entity, incapable of accessing credit; • Employee liabilities, vendor payables, pending consumer court cases, and pending regulatory claims have not been disclosed in the application. The Commission may direct that independently audited asset transfer statements, liability schedules, and receivables aging analysis must be filed and approved by this Commission prior to any licensing decision.	
17.	NETWORK SHARING AND MULTI-LICENSEE LEGAL FRAMEWORK:	A comprehensive 'Infrastructure Sharing Agreement' will be

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	UNRESOLVED Even assuming, for the sake of argument, that the assets are eventually transferred and an independent network is established, the operational model proposed creates additional legal ambiguity under Section 42 of the Electricity Act, 2003. Section 42 governs the duties of the distribution licensee, including the obligation to provide non-discriminatory open access and to develop a co-ordinated distribution system. In a three-DISCOM environment sharing the same physical geography, the following must be clearly determined by the Commission before licence grant: • Wheeling charges payable by TGRPDCL to incumbent DISCOMs for using their upstream network; • Methodology for loss allocation at each voltage level and interface point; • O&M responsibilities and restoration accountability at shared substation bays and 11 kV feeders; • Meter dispute resolution and energy mismatch handling procedures between DISCOMs; • Consumer grievance jurisdiction, especially for mixed-load feeders and DTRs pending segregation. Until these regulatory frameworks are in place, granting a licence to TGRPDCL will create a legally ambiguous operational model that is prone to inter-utility disputes, consumer confusion and deterioration of service standards.	entered by TGRPDCL with the incumbent discoms for ensuring quality of supply to consumers. The terms of such an agreement will be to ensure that the Standard of Performance regulation of Hon'ble TGERC are complied with.

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18.	PRACTICAL AND COST-EFFECTIVE ALTERNATIVE: FEEDER AND VILLAGE-LEVEL BOUNDARY METERING The objective of ring-fencing agricultural consumption can be achieved more reliably, at a fraction of the cost, through feeder and village-level boundary metering. The methodology is as follows: Agricultural Consumption = Total SS / Feeder Input Energy − Village Metered Non-Agricultural Consumption − Separately Metered Non-Agricultural Loads (if any) In most rural areas, villages are supplied through dedicated 11 kV feeders. A single meter at the village common supply point, or at the substation outgoing feeder, is sufficient to compute agricultural consumption by subtraction. Dedicated agricultural feeders can be directly accounted through feeder meters at the 11 kV substation level. Advantages of this approach over DT metering include: • Only ~12,000–15,000 meters required (vs 5,22,479 DT meters) — a 97% reduction in meter count; • Meters installed in secured substation environments, with reliable power supply and access for maintenance; • Implementation possible within 3–4 months; • Proven methodology, field-tested and technically defensible for regulatory energy accounting;	Till such time the Transformer Monitoring Units are fully deployed, existing method of energy accounting as permitted by the Hon'ble Commission will be followed. Presently, feeders with dedicated supply to agricultural consumers are minimal.

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	• No dependency on rural cellular/GPRS connectivity; • Avoids recurring OPEX for meter replacement on failed/damaged DTRs; • Savings of approximately ₹15 Crores per month from improved no-load loss management on agricultural feeders.	
19.	RECOMMENDED PHASED REFORM MODEL: ACCOUNTING SEGREGATION FIRST, PHYSICAL SEGREGATION LATER Instead of immediate physical corporate segregation, the objectives of GO Ms. No. 44 can be achieved through a phased approach: • Phase 1 — Accounting Segregation: Ring-fence all subsidized consumer categories within the existing DISCOM structure by creating separate heads of account. Prepare an independent category-wise P&L statement for all GO-specified categories (Agriculture, LIS, CPWS, HMWSSB, LT VI-B), reflecting energy input, PPA cost, attributable losses, distribution cost, tariff revenue and subsidy receivable. This is executable immediately without any capital expenditure. • Phase 2 — Agricultural Feeder Segregation: Invest in feeder segregation at 11 kV level and substation boundary metering. Validate energy accounting through a supervised pilot in 2–3 divisions for one full year. Submit audited energy accounting results to the Commission. • Phase 3 — Physical Segregation (conditional): Physical corporate segregation should be considered only after Phase 2 results	TGRPDCL has initiated steps to achieve both accounting and physical segregation of assets. It may be noted that physical survey of DTRs are already under way. Hence, TGRPDCL will be in a position to comply with the requirements as laid out as per the licensing regulation issued by Hon'ble TGERC.

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	demonstrate measurable improvement in energy accountability, after adequate manpower build-up, after completion of network asset transfer and audited balance sheet, and after an irrevocable subsidy payment security mechanism is in place and approved by the Commission. This phased approach avoids imprudent capital expenditure, prevents disruption of existing service standards, does not require new corporate establishment costs, and is unlikely to attract farmer or political opposition, while still delivering the policy objective of transparent agricultural subsidy accounting.	
20.	COMMISSION'S STATUTORY DUTY — REGULATORY SCRUTINY REQUIRED The Commission has an overarching statutory duty under the Electricity Act, 2003 to protect consumer interest, ensure financial sustainability of licensees, and promote efficient and economical development of the electricity sector. In this context, the Commission must enforce: • Credible energy auditing and accountability at each licensee level; • Prudent capital expenditure approvals based on historical cost-benefit evidence; • Enforceable payment discipline for Government dues and subsidy; • AT&C loss reduction accountability and milestones for each licensee; • Transparent, audited asset transfer and balance sheet before any	The network identified as per G.O.Ms No 44 would be transferred to TGRPDCL from the incumbent discoms. Hence, TGRPDCL would be in a position to meet the requirements of licensee criteria. As is the case with any new company formation, credit rating will be established once the company commences operations.

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	licence change. Granting a distribution licence to an entity that does not have an independent network, has only ₹5 Crores in equity, has no credit rating, has no business plan, and has no enforceable subsidy mechanism would set a precedent that undermines the statutory licensing framework and may expose consumers and the public exchequer to serious financial risk.	
21.	CONCLUSION For the reasons set out above, the proposal for grant of a distribution licence to TGRPDCL as presently structured is legally premature, financially unviable, operationally impracticable and not supported by adequate feasibility disclosure. The proposal does not address the root causes of DISCOM distress, relies on a metering technology that has repeatedly failed in field conditions, and lacks the basic statutory prerequisite of an independent distribution system. The suggested phased reform model offers a more prudent, cost-effective and legally sound pathway to achieving the same policy objective.	TGRPDCL has initiated steps to meet the requirement of Distribution Licensee as per the criteria laid out by the licensing regulation issued by Hon’ble TGERC.
22.	PRAYER: In view of the foregoing, it is most respectfully prayed that the Hon'ble Commission may be pleased to: a) Hold that the licence application is legally premature in the absence of an independent distribution system as required by Section 14 of the Electricity Act, 2003, and direct TGRPDCL to demonstrate actual ownership and operability of an independent network before grant of	TGRPDCL has initiated steps to meet the requirement of Distribution Licensee as per the criteria laid out by the licensing regulation issued by Hon’ble TGERC. It also may be noted that the Board of Directors, the management team and operation staff have vast experience in all aspects of operation of a distribution network.

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	licence; b) Direct that capital adequacy and creditworthiness requirements under the Distribution of Electricity Licence Rules, 2005 must be fully satisfied and verified by the Commission prior to any licensing decision, given the gross inadequacy of the disclosed equity of ₹5 Crores; c) Direct the applicant and incumbent DISCOMs to file independently audited asset transfer statements, liability schedules, receivables aging analysis and a source-wise PPA allocation framework before the Commission proceeds with the licensing process; d) Reject the LT-side DT boundary metering model as non-compliant with CEA (Installation and Operation of Meters) Regulations (0.2S accuracy class requirement) and as operationally imprudent given its consistently poor performance record under all prior programmes; e) Disallow the proposed ₹1,306 Crores DT metering CAPEX as imprudent and not supported by cost-benefit justification, and direct adoption of feeder-level and village boundary metering as a proven and cost-effective alternative; f) Mandate an irrevocable advance subsidy payment mechanism — in the form of an escrow account, letter of credit or statutory first-charge commitment on the Consolidated Fund of Telangana — as an enforceable precondition for licence grant under Section 65 of the Electricity Act, 2003;	TGRPDCL has filed licensee application in accordance with TGERC regulation. Hence, TGRPDCL prays that the Hon'ble TGERC may grant the Distribution license

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	g) Direct the Government of Telangana to enforce strict and time-bound payment of electricity dues by all Government departments, local bodies and public institutions, and to clear accumulated arrears through specific budgetary allocations, as a prerequisite to any further structural restructuring; h) Direct adoption of the phased reform model — accounting segregation first, feeder segregation second, and physical segregation only upon demonstrated and audited results — as a more prudent and effective alternative to immediate physical corporate bifurcation; i) Defer or reject the grant of distribution licence to TGRPDCL until all legal, financial, technical and operational prerequisites are satisfactorily demonstrated before this Commission; j) Pass such other and further orders as the Hon'ble Commission may deem just, proper and necessary in the interest of consumers and the long-term sustainability of the electricity supply sector in Telangana State.	
భారతీయ కిసాన్ సంఘ్ అభ్యంతరాలు / సూచనలపై సమాధానం:		
23.	మన రాష్ట్ర ప్రభుత్వం రైతు డిస్కం ఏర్పాటు చేసినందుకు స్వాగతం తెలుపుతూ ధన్యవాదాలు కూడా తెలియజేసుకుంటున్నాము. రైతులపై మరియు నీటిపారుదలపై ప్రత్యేక శ్రద్ధతో ఎటువంటి	భారతీయ కిసాన్ సంఘ్ వారు తెలంగాణ రాష్ట్ర రైతు డిస్కం స్థాపనపై వ్యక్తం చేసిన అభిప్రాయాలు, సూచనలు మరియు రైతాంగ ప్రయోజనాల పట్ల చూపిన ఆసక్తికి తెలంగాణ రైతు పవర్ డిస్ట్రిబ్యూషన్ కంపెనీ లిమిటెడ్ తరఫున

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	ఇబ్బందులు రాకూడదనే ఉద్దేశంతో ప్రత్యేక డిస్కం ఏర్పాటు చేసినందుకు రాష్ట్ర రైతాంగం తరపున భారతీయ కిసాన్ సంఘ్ తరఫున ధన్యవాదాలు తెలియజేసుకుంటున్నాము. ఈ చర్య ఆహార భద్రతకు మరియు ఆహార ధాన్యాల ధర పెరగకుండా ఉండడానికి మరియు మెజారిటీ ప్రజలు 60 శాతం మంది వ్యవసాయంపై ఆధారపడిన వారికీ సబ్సిడీ విద్యుత్ ద్వారా నీటిపారుదల కు తోడ్పడి ప్రజలందరికీ ఆహార ధాన్యాల ధర అందుబాటులో ఉండేటట్లుగా ఈ చర్య ఉపయోగపడుతుంది.	హృదయపూర్వక ధన్యవాదములు తెలియజేసుకుంటున్నాము. రైతులకు నాణ్యమైన, నిరంతరాయ మరియు సమయోచిత విద్యుత్ సరఫరా అందించడం సంస్థ యొక్క ప్రధాన లక్ష్యంగా ఉంటుంది.
24.	తెలంగాణ రాష్ట్ర దక్షిణ మండల విద్యుత్ డిస్ట్రిబ్యూషన్ కంపెనీ మరియు ఉత్తర మండల విద్యుత్ డిస్ట్రిబ్యూషన్ కంపెనీలు స్వంతంగా నిధులు సమకూర్చుకునేందుకు వారి పరిధిలో గృహ, వాణిజ్య, పరిశ్రమలు మరియు ఇతర వినియోగదారులు అందరూ తమ తమ వాడకానికి తగ్గట్లుగా బిల్లులు చెల్లిస్తూ ఉంటారు. తద్వారా విద్యుత్ కొనుగోలు భారం మరియు నిర్వహణ భారం భరించడం జరుగుతుంది. రైతు డిస్కం పూర్తిగా సేవాభావంతో ఆహార భద్రత మరియు ఉద్యోగ భద్రత కొరకు సామాజిక బాధ్యతగా పూర్తి బరువు బాధ్యతలను ప్రభుత్వం మోస్తూ ఉంది. దీనివల్ల ప్రత్యక్షంగా రైతులకు, పరోక్షంగా	PPA కేటాయింపులు డిస్కంలకు జి.ఓ.ఎం.ఎస్. నెం.8, తేదీ:08.05.2026 సవరణ ప్రకారం నిర్వహించబడతాయి. విద్యుత్ కొనుగోలు, బకాయిలు, డిస్కంల మధ్య PPA కేటాయింపుల ఆధారంగా విభజించబడతాయి. జి.ఓ.ఎం.ఎస్. నెం.8, తేదీ:08.05.2026 ప్రకారం, తెలంగాణలోని మూడు విద్యుత్ పంపిణీ సంస్థలు అయిన TGRPDCL, TGSPDCL మరియు TGNPDCL మధ్య PPAల కేటాయింపు, TGRPDCL కు అధిక శాతం పునరుత్పాదక ఇంధన (Renewable Energy) వాటా కేటాయించే విధంగా నిర్వహించబడుతుంది. ఎందుకంటే TGRPDCL కు బదిలీ

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	ఆహార వినియోగించుకునే అందరికీ ఆ మేరకు ఆహార సబ్సిడీ వినియోగించుకున్నందున ఆ మేరకు ఆహార ధరలు తగ్గి రాష్ట్ర ప్రజలందరికీ ఈ సబ్సిడీ అందుతుంది అని తెలియజేయుటకు రాష్ట్ర పౌరునిగా గర్విస్తున్నాను. రాష్ట్ర రైతాంగం కొరకు నిర్మించిన నీటి ప్రాజెక్టుల ద్వారా ఉత్పత్తి అయ్యే మొత్తం విద్యుత్తును రైతు డిస్కంకు కేటాయించాలి. రైతుల కొరకు రైతుల భూములలో కురిసిన వర్షాధారంగా రైతుల భూములలో నిర్మించిన నీటి ప్రాజెక్టులు రైతుల సొంతం కావున ట్టి విద్యుత్ ఉత్పత్తి మొత్తానికి యాజమాన్యపు హక్కులు రైతాంగానివి. సోలార్ పవర్ రాష్ట్రం నుండి మరియు ఇతర రాష్ట్రాల నుండి సరఫరా అవుతున్న విద్యుత్తు రైతుల భూముల గుండా హై టెన్షన్ లైన్ల ద్వారా సరఫరా జరుగుతున్న సందర్భంలో రైతాంగం తమ భూములను నష్టపోవడమే కాకుండా అట్టి లైన్ల కింద పలు రకాల పంటలను సాగు కూడా చేసుకోలేక పోతున్నారు. అట్టి భూమి అమ్ముకునేటప్పుడు దాని ధర కూడా చాలా ఇతర భూముల ధర కన్నా తక్కువగా ఉంటుంది. ఈ త్యాగం కూడా రైతులే చేస్తున్నారు కనుక రైతాంగానికి ఈ విద్యుత్తుపై మొదటి హక్కు ఉంటుంది. విద్యుత్ వినియోగము అత్యధికంగా ఉన్న సమయాల్లో అంటే పీక్ అవర్స్ లో రాష్ట్ర రైతాంగానికి విద్యుత్ సరఫరా జరగడం లేదు.	చేయబడిన వినియోగదారుల డిమాండ్ ప్రొఫైల్ కూడా పునరుత్పాదక ఇంధన వనరుల ఉత్పత్తి నమూనాతో అనుసరణలో ఉంటుంది. అలాగే, హైడ్రో విద్యుత్ ప్లాంట్లు కూడా రైతు డిస్కామ్ కు కేటాయించబడింది. దీని ద్వారా LIS అవసరాలను తీర్చడం సాధ్యమవుతుంది. మిగిలిన అవసరాలను D-to-D విద్యుత్ కొనుగోళ్లు ద్వారా సమకూర్చబడతాయి. ఈ విధానం ద్వారా విద్యుత్ మిశ్రమం (Power Mix) సమర్థవంతంగా వినియోగించబడుతుంది.

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	ఎక్కువ ధర చెల్లించి కొనుగోలు చేసిన విద్యుత్తును రైతాంగం వాడుకోవడం లేదు. కావున రైతులకు సరఫరా చేసే విద్యుత్ ధర రాష్ట్రంలో మిగతా వినియోగదారులకు కట్టినట్లుగా పవర్ పర్చేజ్ కాస్ట్ యావరేజ్ కట్టాల్సిన అవసరం లేదు. కనుక ప్రభుత్వం హైడల్ పవర్ మరియు తక్కువ ధరకు వచ్చే సోలార్ పవర్ కాస్ట్ ను మాత్రమే లెక్క తీసుకొని పవర్ పర్చేజ్ కాస్ట్ ను లెక్కించాలి. దానికి అనుగుణంగా చెల్లింపులు చేయాలి. గతంలో క్రాస్ సబ్సిడీ అందుబాటులో ఉండేది. ప్రస్తుతం ఆ సౌకర్యం కోల్పోయే అవకాశం కూడా ఉంది. కావున తక్కువ ధరకు కొనుగోలు చేస్తున్న మరియు ఉత్పత్తి అవుతున్న విద్యుత్తును ఈ రైతు డిస్కంకు కేటాయించాలి.	
25.	రైతు డిస్కంలో సేవలు అందించడానికి సిబ్బందికి ప్రమోషన్ లాంటి తాయిలాలు ప్రకటించి చేరుకోవాలని ఆలోచన చేస్తున్నారని తెలిసింది. ఇది చాలా బాధాకరం. అన్నం పెట్టే రైతుకు వేతనం తీసుకుని సేవ చేయడానికి కూడా సిద్ధం కాని సిబ్బంది ఉన్నారని మేము భావించడం లేదు. వారు తాయిలాలు కోరుకుంటారని అనుకోవడం లేదు. ఈ అనుమానం ఎందుకు వచ్చిందో మేనేజ్‌మెంట్ కు మాకు అర్థం కావడం లేదు.	TGRPDCL సమగ్ర ఉద్యోగి ఆప్షన్ ప్రక్రియను ప్రారంభించింది. ఈ ప్రక్రియలో ఉద్యోగులకు TGRPDCL లో పనిచేయడానికి స్వచ్ఛందంగా ఎంపిక చేసుకునే అవకాశం కల్పించబడింది.

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	రాష్ట్రంలో నిరుద్యోగులు అయిన యువకులు ఎంతోమంది ఉన్నారు. ప్రభుత్వ వేతనాలకు వారు సేవ చేయడానికి సిద్ధంగా ఉన్నారు. డిస్కంలో ప్రస్తుతం పనిచేస్తున్న ఉద్యోగులకు ఇచ్చినంత వేతనాలు ఇవ్వకుండా పని చేయడానికి వేలాది మంది యువత సిద్ధంగా ఉన్నారు. తక్కువ ఖర్చుతో వారిని ఉపయోగించుకొని డిస్కం ఎక్కువ నిధులు ఖర్చు చేయాల్సిన అవసరం లేకుండా నిర్వహణ చేయవచ్చు. పెరుగుతున్న వినియోగం అన్ని రంగాలలో ఉన్నది కావున ప్రస్తుతం ఉన్న ఉద్యోగులను ప్రస్తుతం ఉన్న డిస్కములలో సర్దుబాటు చేసి అనుభవం కొరకు కొంతమందిని సేవాభావం కలవారిని తీసుకొని, కొత్త సిబ్బందిని నియమించుకొని ప్రభుత్వ ఉద్యోగులతో సమానంగా వేతనాలు ఇచ్చి పనిచేయించుకోవచ్చు. ఎంతోమంది కొత్తవారికి ఉద్యోగాలు ఇచ్చిన కీర్తి కూడా ప్రభుత్వానికి వస్తుంది. డిస్కంలో ప్రస్తుతం పనిచేస్తున్న వారి వేతనాలు చాలా ఎక్కువ. ఒకరి వేతనంతో కనీసం ముగ్గురిని నియమించుకునే అవకాశం ఉంది. కావున ఇట్టి అవకాశాన్ని ఉపయోగించుకొని భవిష్యత్తులో నిర్వహణ భారం పెరగకుండా సరైన చర్యలు తీసుకుంటారని తమరిని కోరుచున్నాము.	ఉద్యోగుల కేటాయింపు లేదా బదిలీలు, ఉద్యోగుల స్వచ్ఛంద ఆసక్తి, సీనియారిటీ మరియు ఇతర ప్రమాణాల ఆధారంగా నిర్వహించబడతాయి. సమగ్ర ఉద్యోగి ఆప్షన్ పోర్టల్ ద్వారా TGTRANSCO, TGGENCO మరియు TGDISCOMల పరిధిలోని ఉద్యోగులు TGRPDCL లో పోస్టులకు దరఖాస్తు చేసుకునే సౌకర్యం కల్పించబడింది.

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	రైతు డిస్కంలో చేరడానికి ఉద్యోగస్తులు ఇబ్బంది పడుతున్నారు అంటే, ప్రభుత్వం పైన విశ్వాసం లేకపోవడం లేక వారు పని చేసే చోట అదనపు ఆదాయానికి అవకాశం ఉండటమా అనే అనుమానం ప్రజలకు వస్తుంది. దీనిని నివృత్తి చేయాల్సిన బాధ్యత గౌరవ కమిషన్ పైన మరియు ప్రభుత్వం పైన ఉంది. సమయానుకూలంగా గౌరవ కమిషన్ కు మరియు నూతనంగా ఏర్పాటైన రైతు డిస్కం నిర్వహణ బాధ్యులకు మరియు ప్రభుత్వానికి తగిన సలహాలు సూచనలు ఇస్తూ వారి సేవలు పొందడానికి రాష్ట్ర రైతాంగం మరియు భారతీయ కిసాన్ సంఘ్ ఎల్లవేళలా వాస్తవిక మరియు అనుకూల దృక్పథంతోనే పనిచేయడానికి సిద్ధంగా ఉన్నదని సవినయంగా తెలియజేసుకుంటున్నాము.	
Response to M Thimma Reddy		
26.	The existing statutory and regulatory provisions provided to recover cost of power supply through periodic tariff filings and true up claims. Telangana state has experienced inordinate delays in filing annual tariffs as well as true up claims. Even when the Commission approved true up claims of	TGDISCOMS had filed the Aggregate Revenue Requirement (ARR) on 29th Nov 25 With regard to PP true-ups for FY 22-23 and Revenue true-up for

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	TGDISCOMs there was no clearance from the GoTG to recover these true up claims. This cannot be solved by creating third DISCOM	FY 23-24 and FY 24-25, Hon'ble Commission has mentioned that the formation of this third DISCOM will bring in significant structural and institutional changes in the Distribution sector like change in the consumer mix and energy requirements, impacting the ARR, Revenue Gaps and subsidy allocations for existing TGDISCOMs. Hence, the Commission will decide on the manner of passing on the Power purchase true-up of FY 2022-23 and revenue true up of FY 2023-24 in due course of time.
27.	The present State Government of Telangana brought out "Telangana State Power Sector – White Paper" in December 2023. According to this white paper at the end of the FY 2022-23 TGDISCOMs had negative net worth of Rs. 34,879 Crore and had accumulated losses of Rs. 62,461 Crore. The white paper attributed these losses to issues in estimation of agricultural consumption, procurement of short-term power, and failure to recover true up and fuel cost adjustment amounts. Two and half years have passed since the release of the above white paper and there are no changes in these issues. TGDISCOMs continued to incur losses. By the end of the financial year 2024-25 the accumulated losses of TGDISCOMs increased to Rs. 71,274 Crore.	TGRPDCL submits that the intent of creation of new DISCOM as per the GO is to address these issues of accumulated losses through dedicated governance and management focus. TGRPDCL is taking necessary steps in implementing the proposal. One of the objectives of the proposed transformative is to reduce losses. Focused approach on managing agricultural and allied categories is expected to bring in efficiencies in accounting and power purchase planning leading to optimization of costs.
28.	The white paper also drew attention to inordinate delays in execution of YTPS and BTPS thermal power plants and their high capital cost. YTPS is	Four units of YTPS have been already commissioned. All costs incurred by BTPS are put up for prudence check and approval of

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	yet to declare CoD of the Project. Even after achieving CoD BTPS continued to incur additional capital cost and is reported to be procuring spare parts at high prices.	Hon'ble Commission.
29.	The G O Ms No. 44 also has shown another important statistic indicating poor financial health of TGDISCOMs. As on 31st July, 2025 TGDISCOMs have to receive arrears of Rs. 45,398 Crore from government departments. TGDISCOMs have to receive arrears from other consumer categories also. According to the tariff order for the FY 2026-27 at the end of FY 2023-24 Rs. 3,386.22 Crore of balance subsidy has to come from GoTG (Para. 3.15.1). Information is not available on whether GoTG had met its subsidy commitment related to FYs 2024-25and 2025-26. Because of these huge receivables TGDISCOMs were not able to pay to power generators, particularly TGGENCO, in time. TGGENCO in turn was not bale to pay fuel suppliers in time. Due to these pending payments TGDISCOMs as well as TGGENCO had lower credit ratings leading to higher costs in mobilising funds. Without addressing these pending payments from GoTG creation of third DISCOM will not help in any way in improving financial health of electricity utilities in the state. In the background of these pending payments from GoTG we cannot	TGRPDCL submits that the formation of new DISCOM should not be seen as an isolated step but as a transformative measure in sync with the ongoing efforts to address the systemic issues in Telangana Power Sector. The improvement in efficiencies due to the above reformative step would lead to better performance and enhancing the credit rating of TGDISCOMs. It may be noted the subsidy amount from GoTG has been completely received for FY 24-25. With regard to FY 25-26, the amount budgeted by GoTG towards subsidy has been largely received.

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	expect GoTG to take over, fully or partially, TGDISCOMs' debt.	
30.	The consumer categories allotted to the third DISCOM are government subsidized or government supported consumer categories. These consumer categories are taken away from the incumbent DISCOMs. The third DISCOM alone has to face these problems of arrears from state government departments and delay in disbursement of subsidies by the state government while the incumbent DISCOMs are insulated from these problems. Creation of third DISCOM – TGRPDCL – appears like institutionalising indiscipline and inefficiency. There will be no control over pending arrears from state government departments and disbursal of subsidy by the State Government. Given the constraints flowing from lack of funds at its disposal the third DISCOM will not be in a position to discharge its services efficiently	Formation of TGRPDCL is reformative step and aimed at improving the financial sustainability of TGDISCOMS and also improving the supply quality to consumers. This step is expected to bring in focus and improve performance through clear accountabilities on costs and losses. Farmer centric measures are expected to improve the safety aspects, quality of supply, better grievance redressal mechanisms.
31.	TGRPDCL filed an application before the TGERC for grant of distribution license under Section 14 of the Electricity Act, 2003. According to this Section "The Appropriate Commission may, on an application made to it under section 15, grant a licence to any person - … (b) to distribute electricity as a distribution licensee; …" and "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, subject to the conditions that the applicant for grant of licence within the same area shall, without prejudice to the other conditions or requirements under this Act, comply with the additional requirements	TGRPDCL submits that operations would be managed through a mix of network ownership and also through a service agreement for upstream assets to ensure quality of supply as per SoP regulations. Identified network as per the GO would be transferred to TGRPDCL.

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	including the capital adequacy creditworthiness, or code of conduct as may be prescribed by the Central Government, and no such applicant, who complies with all the requirements for grant of licence shall be refused grant of licence on the ground that there already exists a licence in the same area for the same purpose:" According to Section 2 (19) of the Act, "'distribution system' means the system of wires and associated facilities between the delivery points on the transmission lines or the generating station connection and point of connection to the installation of the consumers:" Under the current design of allocation of assets between the incumbent DISCOMs and the present applicant TGRPDCL the latter will get DTRs and lines downstream connecting to the consumers. These DTRs are not connected to the transmission lines or generating station connections. As such it cannot be said that the applicant TGRPDCL has its own distribution system. Though TGRPDCL will be handling more than 40% of the electricity consumed in the State it will not be having a distribution system of its own. As such it is not eligible for a separate distribution licence	
32.	According to Section 12 of the Regulation 04 of 2016 (Distribution License), "'A person applying for grant of a licence for distribution of electricity through his own distribution system within the same area of supply of an existing Distribution Licensee shall, in addition to the provisions of Rules 4 to 11 of this Regulation, comply with "Distribution of	It may be noted that loans transferred to 3rd discom are backed by State Government Guarantee. Also, in due course based on need there would be additional support from GoTG. The identified network as per GOMs 44 would be transferred to TGRPDCL. This will enable it to serve the consumers along with

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	Electricity Licence (additional requirements of Capital Adequacy, Creditworthiness and Code of Conduct) Rules, 2005" (known as Capital Adequacy Rules) issued by the Central Government.'" According to The Distribution of Electricity License (Additional Requirements of Capital Adequacy, credit worthiness & code of conduct) rules 2005, "(1) The appropriate commission shall, upon the receipt of an application for grant of license for distribution of electricity under sub-section (1) of section 15 of the Electricity Act,2003, decide the requirement of capital investment for distribution network after hearing the applicant and keeping in view of the size of the area of supply and the service obligation with that area in terms of section 43 "(2) The applicant for grant of license shall be required to satisfy the Appropriate Commission that on a norm of 30% equity on cost of investment as determined under sub-rule (1), he including the promoters, in case the applicant is a company, would be in a position to make available resources for such equity of the project on the basis of net worth and generation of internal resources of his business including of promoters in the preceding three years after excluding his other committed investments" The stipulation on net worth is provided to see that the new/parallel DISCOM starts on clean slate and has the financial resources to take up the responsibility of distribution licensee.	support from GoTG. PPA allocation would be as per the latest GOMs No 8 and generator payables would be allocated accordingly across TGDISCOMs.

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	The applicant DISCOM – TGRPDCL - is being carved out of the two incumbent DISCOMs who have negative net worth. Automatically, the third DISCOM will inherit negative net worth from the incumbent DISCOMs. In fact, distribution of assets between the third DISCOM and the incumbent DISCOMs is being done in such a way that most of the negative net worth of the incumbent DISCOMs will be transferred to the third DISCOM, so that accounts of the incumbent DISCOMs will be clean and get higher credit rating. The third DISCOM is allotted 79.26% of arrears from Government departments amounting to Rs. 35,982 Crore and 85% of payables to power generators amounting to Rs. 26,950 Crore. The consumer categories allocated to the third DISCOM are either fully subsidised or the public utilities owned and run by the State Government which have piled up huge arrears. The new, third DISCOM is being born as handicapped or unwanted. Given the negative net worth inherited by it the third DISCOM would not have any capacity to generate internal resources to take up any meaningful development activity. Though a Net worth certificate for Rs. 5 Crore is produced in response to the Commission's letter to fill the gaps in information provided as a part of the application for distribution licence, it would be wiped out due to negative net worth running in to thousands of crores of rupees being inherited by it from incumbent DISCOMs.	

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	Under Particulars of the Applicant Point 18 is as follows: “A) Whether Applicant himself shall be financing the proposed distribution of electricity fully on its own balance sheet: Yes” But according to the G O Ms. No.44 it is allotted certain portion of the existing distribution network that is tied up with debt/negative net worth.	
33.	Similarly, Point 20 is as follows: “Details of debt proposed for the distribution Activity: Yet to be tied up.” But according to G O Ms. No.44 Rs. 9,032 Crore debt is allocated to it. This G O is issued before TGRPDCL filed the Application for Distribution Licence. This shows that the Application for distribution licence does not reflect the ground reality.	TGRPDCL submits as follows - Details of debt proposed for the distribution activity primarily refers to the debt to be tied-up for complying with Debt:Equity norms for meeting the CAPEX requirements as per the MYT regulation. The CAPEX requirements over the years would be detailed in the business plan. Accordingly, the necessary debt would be tied up.
34.	In the corporate world it is normal to demerge or hive off under performing or loss making unit in to a separate company to save financially healthy part of the Company. But under the E Act and the Rules and Regulations formulated under it for credit worthiness of the parallel licensee it is not possible to create a company which by birth is not credit worthy and financially weak. From the above it can be said that TGRPDCL fails net worth test to obtain parallel distribution licence in the State of Telangana.	TGRPDCL submits as follows – Any new entity which is applying for a parallel distribution license needs to demonstrate capability to invest adequate capital for building and maintaining a distribution network in order to ensure service quality to consumers as per SOP and also in meeting the USO. Unlike the above situation, the identified network assets from the incumbent DISCOMs would be transferred to TGRPDCL.
35.	According to Section 5 of the G O, “The third DISCOM shall be completely	TGRPDCL submits that operations would be managed through a

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	responsible for supplying electricity to the consumers of following categories. Agriculture, Lift Irrigation Schemes (LIS), Composite Protected Water Supply Scheme (CPWS)/ Mission Bhagiratha, Hyderabad Metropolitan Water Supply and Sewerage Board (HMWSSB), and Municipal water connections with separate DTRs (LT VI-B)” Under Assets to be Transferred to Third DISCOM (Section 6) Downstream of assets from the Agri DTR till the end consumption point, that would cover the Agri DTRs and LT Lines are only included. That is asset transfer includes only agriculture pump set related infrastructure. Book value of these assets are Rs. 4,929 Crore. Under Assets to be Transferred to Third DISCOM DTRs, HT/LT lines and related electrical infrastructure of other consumer categories to be served by the third DISCOM are not included.	mix of network ownership and also through a service agreement for upstream assets.
36.	According to the G O “Loan amount to be transferred to third DISCOM = (Value of Distribution Network Transferred) + (Government Receivables Transferred)– (Payables to GENCO, STU, SCCL Transferred). According to Table 11 in the G O Loans (Rs. 9,032 Crore) = Government receivables (Rs. 35,982 crore) – Generators payables (Rs. 26,950 Crore). There is no mention of Value of Distribution Network Transferred to the third DISCOM in the Table 11. Does it mean that no part of distribution network is transferred to the third DISCOM?	TGRPDCL submits that that formal process of segregation of assets and liabilities are underway and the same would detailed out during submission to Hon’ble Commission The identified network as per G.O.Ms No 44 would be transferred to TGRPDCL.
37.	The paragraph before the Table 11 in the G O is as follows: “The amounts	TGRPDCL submits that that formal process of segregation of

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	equivalent to Government services arrears, power purchase true ups approved, fuel charge adjustment amounts, cost of assets and other amounts due to DISCOMs by Government of Telangana, equivalent loan amounts and payable to the GENCOs will be transferred to the 3rd DISCOM." In the Table 11 under the column 'Assets Transferred' only amount related to government receivables, i.e., arrears appears.	assets and liabilities are underway and the same would detailed out during submission to Hon'ble Commission
38.	According to Section 3 of the G O the jurisdiction of the third DISCOM shall be the entire State of Telangana. If intra-state renewable energy units are allocated on geographical basis then third DISCOM also shall have its share in these units as its jurisdiction encompasses the whole state of Telangana.	TGRPDCL submits that the principle of PPA allocation would be based on the GO.
39.	Upcoming solar units under KUSUM and Indira Mahila Sakthi are allocated to the third DISCOM for RPO compliance. The third DISCOM accounts for 42% of electricity consumption in the State. Given this share in electricity consumption its RPO compliance requirement will be high. The time lines of execution of KUSUM and Indira Mahila Sakthi units are not clear. What shall the third DISCOM do to meet its RPO requirement until these units come on stream? It is doubtful whether electricity generated by KUSUM and Indira Mahila Sakthi units will be sufficient to meet the third DISCOM's RPO compliance.	TGRPDCL submits that based on the PPA allocation as per the GO, necessary steps would be taken to ensure compliance with the RCO.
40.	Though the third DISCOM accounts for 42% of electricity consumption in the state its consumption (particularly agriculture and lift irrigation	Allocation of power across DISCOMs across discoms would be done as per the GO issued. Since allocation would be done across

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	schemes) is characterised by intra-day and seasonal fluctuation. Given this fact, there shall be flexibility in allocation of electricity to the third DISCOM.	various sources of power (thermal/ solar/ wind/ hydro), there would be flexibility for the discoms to meet their load profile in an optimal manner.
41.	Much of electricity consumption in the TGRPDCL license area is either state subsidised or state financed. In order to bring down financial burden on the State Government cheaper power may be allocated to TGRPDCL.	TGRPDCL submits that power allocation across the three DISCOMs would be done in such a manner to ensure uniform retail supply tariff across the state.
42.	In the past the Commission directed the TGDISCOMs to install meters on agriculture DTRs. But TGDISCOMs avoided doing it on one or the other pretext. At one time they reported that they were not able to mobilise finances to take up metering of agriculture DTRs. At another time they responded that agriculture feeders would be separated and metering these separate feeders would be sufficient to measure power consumption by agriculture connections. But they never submitted time line and cost of separate agriculture feeders.	TGRPDCL is following due process in order to achieve the objectives set out in the GO. Upon obtaining the license from Hon TGERC, TGRPDCL will initiate appropriate steps and set out the modalities for monitoring of DTRs.
43.	Under TGRPDCL it is proposed to meter 5,22,479 agriculture DTRs. The smart meter will be of 0.2S accuracy. The cost of Smart Meter installation per DTR is considered at Rs 25,000. Total cost of this metering will be Rs. 1,306 Crore. Recently APEPDCL of Andhra Pradesh has carried out installing smart meters on agriculture DTRs in one circle. Cost of each smart meter was about Rs. 6,000. If this rate is taken into account total cost of installing smart meters on agriculture DTRs in Telangana will be Rs. 313.49 Crores. The cost of metering mentioned in the G O is four	TGRPDCL submits that an appropriate model for implementation of DTR monitoring units will be examined in detail, and the proposal will be placed for regulatory approval. TGRPDCL also submits that feeder separation is a CAPEX intensive exercise and comes with the associated higher project execution timelines.

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	times higher than this. As each DTR is considered as an interface point, meters of higher accuracy have to be installed. The third DISCOM, TGRPDCL, has to incur cost of Rs.1,000 Crore more for installation of meters on agriculture DTRs	
44.	In Telangana some feeders serve only agriculture DTRs. These feeders are already metered. In these cases, meters on the feeders will be sufficient to measure electricity consumption. Agriculture DTRs under these feeders need not be metered. To that extent cost of metering agriculture DTRs will come down. If TGRPDCL gets the distribution license this saving may not be possible.	In Telangana, there is 24 hours supply of power to agricultural consumers. In view of this and considering the CAPEX and time intensive nature of feeder separation, the quantum of dedicated feeders with agricultural DTRs are lower.
45.	It is important meter agriculture DTRs to measure electricity consumption by agriculture services. Is it necessary to create a separate DISCOM – TGRPDCL – just to take up this work? What is more cost of metering under new dispensation will be four times more! To this one has to add additional cost of upgrading existing meters with the other category connections such as LI Schemes, HMWSSB, CPWS/Mission Bhagiratha, Municipal water works (LT VI-B). Agriculture DTRs are spread over nook and corners of the state. Some parts of the State do not have network coverage. In such areas installation of smart meters will not be feasible.	TGRPDCL submits that there will be comprehensive techno - commercial assessment of models and technology to be deployed to ensure complete network coverage.
46.	Under the new dispensation “smart meter reading will be done on monthly	TGRPDCL submits that an appropriate methodology would be

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	basis by both incumbent and third DISCOM." This situation arises because each DTR is considered as an interface point in electricity supply. Is it possible and necessary for both the incumbent and third DISCOM to take up monthly meter reading of more than five lakh meters? If TGRPDCL gets the distribution license it will have the distinction of having the highest number of interface meters.	evolved in-line with extant regulations to ensure compliance. The same would be detailed out as part of the business plan
47.	For the FY 2026-27 the Commission estimated cost of service for LT agricultural connections to be Rs. 8.99 per unit. Power consumption by LT agriculture services is estimated to be 23,193.60 MU. Based on this total cost of power supply to LT agriculture services during the FY 2026-27 will be Rs. 20,851 Crore. Out of this tariff income from the LT agriculture services will be Rs. 118.42 Crore. Government of Telangana has come forward to provide subsidy of Rs.12,181.21 Crore towards free power supply to LT agriculture services. The remaining cost of supply of free power to LT agriculture services amounting to Rs. 8,551.37 Crores has to be met through cross subsidy by subsidizing consumers.	As per the amended GO, PPA allocation would be done in such a manner so as to ensure uniform tariff across the state. In such a scenario, the concern raised by objector would get addressed.
48.	Once LT agriculture services are transferred to TGRPDCL this cross subsidy burden also has to be borne by the State Government as there will be no subsidizing consumers under TGRPDCL. Creation of a separate DISCOM for LT agriculture services which receive free power supply will lead to substantial additional subsidy burden on the State Government. Separate DISCOM for agricultural services in stead of reducing financial burden on the state government will only add to it.	TGRPDCL submits that the intent of the transformative step of new discom formation is to ensure improved quality of supply and bring in efficiency through dedicated governance measures. As the objector would be aware, cross subsidy has to be reduced in a phased manner as per the existing legal and regulatory framework.

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49.	Proposed manpower requirement for the Third DISCOM for performing Operation & Maintenance responsibility includes 660 engineers, 1,000 O&M staff and artisans, and 340 administrative staff totalling 2,000. According to the G O "the third DISCOM shall be responsible for supply of electricity, billing (if any) and grievance redressal to the said consumer categories." 2,000 strong staff of the third DISCOM have to attend to nearly 5.25 lakh DTRs and connected wires. Each staff member has to look after more than 260 DTRs and associated wires. At present TGSPDCL has a staff strength of 28,773 and TGNPDCL has a staff strength of 19,308. Can 2,000 strong staff of the third DISCOM manage 42% of power supply in the State?	TGRPDCL submits that the complete operations of the company would be managed through a combination of staff transfers and also through the 'service agreement' to be entered by TGRPDCL with the existing discoms. The above arrangement would ensure that the service delivery is well within the SOP issued by Hon'ble TGERC
50.	At present farmers in Telangana are facing many problems related to electrical supply. They do not have proper technical and manpower support from the existing DISCOMs to tide over their problems related to electrical supply. One of the results of this is death of hundreds of farmers every year due to electrical shocks. This situation will deteriorate further if the proposed manpower allotment is adopted	On the contrary, TGRPDCL submits that through the proposed arrangement greater efficiencies in operation and safety environment would be achieved though clear cut demarcation of roles and responsibilities and greater management focus.
51.	TGRPDCL is also being set up in the name of improving services to farmers. But the way the third DISCOM is being created and structured famers in the state have to be prepared to face even more difficulties in receiving proper electricity supply.	TGRPDCL submits that the very intent of creating a dedicated discom for agriculture and allied consumer categories, is to ensure improvement in service delivery and quality of supply. TGRPDCL is taking steps to ensure the above objectives are met.

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52.	Irrespective of the outcome of the present petition (OP No.11 of 2026) we request the Commission to advise the State Government to release arrears pending from state government departments in a time bound manner. We also request the Commission to direct DISCOMs to take effective steps to bring down arrears from other consumers	TGRPDCL will abide by the directions issued by Hon'ble TGERC
Response to Patlolla Shashidhar Reddy		
53.	What is the purpose of establishing of Third DISCOM in Telangana State	TGRPDCL submits that the primary objective of establishing the Third DISCOM is to enhance the overall financial stability and operational efficiency of DISCOMs in the State. The restructuring will enable all three DISCOMs to operate with improved financial discipline and accountability. At the same time, SPDCL and NPDCL gain financial space to access schemes like RDSS and undertake system upgrades without the burden of large unpaid subsidies
54.	What are the benefits of the agricultural farmers with establishment of Third DISCOM	The establishment of the Third DISCOM is designed to enhance the quality and reliability of power supply to the agricultural sector. The key advantages include: • Improved quality and reliability of power supply through focused infrastructure development and better operational management • Participation in infrastructure initiatives, enabling upgrades in feeders, transformers, and last-mile networks serving

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		agricultural consumers better.
Response to Tuljaram Singh Thakur		
55.	At the outset, we wish to submit that the very purpose of creation of new DISCOM, TGRPDCL, is to white wash the balance sheets of the existing DISCOMs to enable them to go for new loans and to create an easy path for privatization of the DISCOMs in future. In doing so, Govt of Telangana appears to take hasty steps to create a new DISCOM, without proper study of the systems, as was done by the then Govt in later 1990s at least. Although, the statements are being released that the very purpose of creating of new DISCOM is to give better service to the Agl services, this is going to worsen the services to the Agl services in practice. Added to this, creation of new DISCOM will further worsen the financial position of the sector due to several additional administration related expenses and several additional taxes to be borne by the new DISCOM	TGRPDCL submits that the issue raised by the objector needs to be viewed from wider ambit of reforms aimed at improving the service quality and financial sustainability of DISCOMs, rather than from a tax aspect only. It may be noted that the formation of a new licensee to exclusively serve agricultural and allied consumers is a transformative step in the protracted reforms journey which the power sector has been witnessing since 2003. The guiding principle of this reformative measure is to ensure quality and reliable power supply to the consumer categories and to progressively improve the financial position of DISCOMs. The operational framework proposed is mix of asset ownership coupled with service agreement (with incumbent licensees) for upstream assets to ensure power supply as per the Standards of Performance.
56.	Equity is shown as Rs 5 Cr. TGRPDCL may justify how is it possible to run such a big state wide DISCOM with such a tiny equity?	The major CAPEX expenses of TGRPDCL would be related to release of new service connections, installation of Transformer Monitoring Units (TMUs) and network enhancements on need

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		basis. The above CAPEX requirements is expected to occur in a phased manner. GoTG will be infusing the necessary equity on need basis to support the above CAPEX schemes.
57.	Directors of TGRPDCL are same as the Directors of the other 2 DISCOMs. How can the TGRPDCL act independently then?	The current arrangement is an interim one to manage the day to day operations of newly formed TGRPDCL. In due course of time, TGRPDCL will go for Director appointments following a due process.
58.	Beyond 11 KV, the jurisdiction falls under the existing 2 DISCOMs. In such a case, how is it possible to attend the emergency services like DTR failures, Fuse off calls, Break downs, O&M Works etc., quickly?	A comprehensive service level agreement would be entered by TGRPDCL with incumbent DISCOMS (TGSPDCL, TGNPDCL) for operation and maintenance of upstream assets (11 kV & 33 kV lines, SS). This will ensure supply of reliable and quality power to TGRPDCL and in complying with Standards of Performance (SoP) issued by Hon'ble TGERC.
59.	When all the DTR repairing centers (SPMs) and Material stores etc are under the existing DISCOMs, will the coordination between the DISCOMs not throw challenges in consumer service matters and network maintenance matters?	A comprehensive service level agreement would be entered by TGRPDCL with incumbent DISCOMS (TGSPDCL, TGNPDCL) for operation and maintenance of upstream assets (11 kV & 33 kV lines, SS). The overarching objective of such an agreement would be ensure that TGRDPCL is fully compliant with SoP issued by Hon'ble TGERC. The points mentioned by the objector are matter

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		of detail and these would be covered in the service agreement.
60.	The new DISCOM will be without any of its own Distribution network. It means, for everything like DTR replacement etc., the new DISCOM shall depend on the existing DISCOMs. As per the Tax rules, every service rendered by the existing DISCOMs to the new DISCOM will attract taxes. Is this not going to burden the sector further financially? Commission may look into these accounting/taxation related issues before granting license since all these additional financial burdens will cost the Consumers and State exchequer ultimately.	TGRPDCL submits that the issue raised by the objector needs to be viewed from wider ambit of reforms aimed at improving the service quality and financial sustainability of DISCOMs, rather than from a tax aspect only. As per GOMs No 44, identified network assets would be transferred to TGRPDCL. If TGRPDCL were to construct the upstream network assets i.e 11 kV, 33 kV lines and associated CAPEX, this would result in un-necessary duplication of infrastructure and the consumers would be burdened with higher costs. The proposed arrangement ensures optimal utilization of existing network infrastructure and also in ensuring reliable power supply to end consumers.
61.	Creation of new DISCOM, out of the existing 2 DISCOMs is a very big decision, post unbundling of the erstwhile APSEB. Then, is it not essential to make the existing DISCOMs also parties to this Petition? Commission may take a serious call on this aspect.	TGRPDCL submits that the incumbent licensees -TGSPDCL and TGNPDCL have conveyed 'No Objection' to the creation of the new DISCOM ie TGRPDCL
62.	Presently, after adjusting the cross subsidies from the Subsidizing categories, state is proving subsidy and even in that there are several complaints which are evident with the year-on-year True Up claims by the	The key determinant of cross-subsidy in the system is the difference between 'Average Billing Rate – ABR' and 'Average

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	DISCOMs. In such a scenario, with the creation of new DISCOM, with a totally allocated subsidized categories and without any Subsidizing Categories in the profile, what kind of exercise the Commission is going to take up for adjustments? As per a rough estimate, in the absence of Subsidizing categories, the total subsidy amount to be given to the new DISCOM may cross Rs 25,000 Cr. Commission may seek a clear assurance to this extent before issuing the License since this is going to be very critical for the very existence of the new DISCOM. Even if any assurance is given also, Commission may direct the DISCOMs to submit the reports on Subsidy releases by Govt every month.	Cost of Service – ACoS' of the discoms. Further power purchase costs constitute more than 70% of ACoS. In light of the points submitted above and the latest GOMs No 8 PPAs would be allocated across the DISCOMs to ensure uniform retail tariffs across the states. This mechanism would address the concern of the objector on cross subsidy. TGRPDCL would be complying with Hon'ble TGERC reporting requirements on Subsidy.
63.	After the formation of the new DISCOM, how these DISCOMs are going to ensure 'Universal Supply Obligation' (Sec 43 of EA 2003) as per the provisions of the EA 2003, since these DISCOMs become kind of service categories centric, losing their basic character of geography centric?	Universal supply obligation has been mandated in Electricity Act 2003, in order to ensure no consumer is denied power supply by a Distribution licensee, citing remote conditions or infeasibility in supply of power. In the current scenario, TGRPDCL has been specifically formed to cater to power supply to all agricultural consumers and allied consumers, some of them may be located remotely and difficult to serve.
64.	Another important point is, the new DISCOM is before this commission for License without any Business Plan nor with any Debt tie up. Commission is humbly requested to look into these aspects, including the aspect of tiny	TGRPDCL submits that the five-year business plan will be submitted to the Hon'ble Commission within three months of licence grant as required under "Clause 38.1 of Regulation 04 of

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	equity of Rs 5 Cr, before granting License the new DISCOM to serve the very poor farmers in the state and also very critical Lift Irrigation Projects and Drinking Water schemes.	2016 (Distribution License Regulations). Extract from regulation "*38.1 Subject to other regulations notified by the Commission, the Distribution Licensee shall submit a Business Plan within three (3) months of the Distribution Licence coming in force for such period as the Commission may direct and shall update such plan annually. The Business Plan shall, inter-alia, contain (i) year wise load growth, (ii) year wise Distribution loss reduction proposal along with specific action plan, (iii) metering plan for metering interface points, (iv) treatment of previous losses, (v) cost reduction plan, and (vii) other important financial analysis or parameters.*
65.	Sec 14 of the Act clearly stressed upon 'Credit worthiness', 'Capital Adequacy' etc., If Commission wishes to grant the License, justification to these things need to be given in the orders to the satisfaction of the consumers in the state.	It may be noted that loans transferred to 3rd discom are backed by State Government Guarantee. Also, in due course based on need there would be additional support from GoTG
66.	Sec 17 (2) (3) of the Act specify that minimum one month notice is to be issued to other Licenses in the same area. It is not clear whether such notices are issued. Further, the existing DISCOMs shall obtain prior approval of the Commission and also the existing DISCOMs shall notify to their consumers about the new changes. Commission is requested to clarify whether all these procedures are followed by the Old DISCOMs and the new one?	TGRPDCL submits that it has followed the due process outlined by Hon'ble TGERC for the licensee application. The entire application of TGRPDCL has been put in public domain and Hon'ble Commission has sought for comments and suggestions from the general public.

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		TGRPDCL has given wide publicity in newspapers (3 languages) for wider dissemination of the proposal among the consumers. The incumbent licensees – TGSPDCL and TGNPDCL have conveyed 'no-objection' to the proposal.
67.	There are speculations that all the low cost PPAs will be transferred to the new DISCOM. Why should the consumers of the existing DISCOMs be penalized with high cost PPAs?	The over-arching principle for PPA allocation is to ensure that there is 'uniform tariffs across the State.
68.	There is no clarity on how the new DISCOM proceeds with the power procurements when it is going to be burdened with all the liabilities?	TGRPDCL will be submitting the Business plan within 3 months of the issuance of the license by the Hon'ble Commission. The Business plan will outline the power procurement plan to meet the energy requirements of the license over the years
Response to K Subash Chandra Bose and **C Madhava Reddy**		
69.	Vide GOMS No 44 Dt 17-12-2025 the Government of Telangana state issued Suo Moto orders for creating a Third Discom i.e. Telangana Rythu Power Discom Company Ltd aiming for rendering better services mainly to agricultural category services and other services. In the GO hardships/problems if any being faced by agriculture consumers and deficiencies noticed in the incumbent Discoms in rendering effective services to the agriculture consumers and the proposed remedies to be tackled not stated.	TGRPDCL submits as follows – The GO clearly articulates that the precarious financial situation of discoms is limiting their ability to secure funding for developmental activities. This limitation has an adverse impact on the quality of supply. The GO outlines the modalities to be adopted for achieving this

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	Hence there is practically NO agenda to be discussed in the public hearing on 28.5.2026. The GOMS NO 44 appears issued without substantiating purpose/necessity for creating 3 rd Discom called TGRPDCL. Hence it deserves to be set-aside as it is Abinitio-Wrong.	objective. Further, the proposal is expected to deliver direct benefits to agricultural consumers by improving the quality and reliability of supply through strengthened distribution infrastructure. It will also enable focused operational attention on agricultural feeders and related services, ensuring quicker response and better maintenance. In addition, consumer interface will be strengthened through the establishment of two Consumer Grievance Redressal Forums (CGRFs), which will provide an accessible and dedicated mechanism for resolution of consumer issues.
70.	The engineers of the cadre AE and above in the incumbent Discoms are entrusted to deal and serve all categories of consumers including agriculture consumers. Protection, DPE, TRE, construction, Masterplan, Commercial etc. are the activities including serving to agriculture consumers are some of the vibrant responsibilities they hold. In the incumbent Discoms there is no separate wing or cadre of engineers to deal exclusively with agriculture category only. Suppressing 2000 experienced and professional engineers of all cadres is illogical as it creates vacuum (no personnel) to deal with the balance other	TGRPDCL submits as follows – Power Distribution is a complex activity encompassing skills/ capabilities acquired across various fields such as network engineering, planning, finance, commercial, demand forecasting, asset maintenance etc. Success of the DISCOM is dependent on the culmination of efforts of staff in all the above areas. It may be noted that both from an organizational and employee perspective there is more value in an employee working across different areas to gain a holistic perspective and this greatly enhances the organizational capabilities. TGRPDCL is going to serve consumer categories such as - lift irrigation schemes,

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	activities other than agriculture category handled. Hence as a policy the TG Govt must appoint necessary staff to meet the needs of agriculture category in the upcoming Discoms. Hence suppressing 2000 posts (including all cadres) is an inadvertent decision as it creates vacuum and dislocates smooth functioning of incumbent Discoms. The situation is similar to transferring Munsif Magistrate dealing with different types of cases including agriculture land disputes to a Special Court created to deal with Agriculture land disputes. In such case Munsif Magistrate court becomes headless to deal other cases	CPWS, HMWSSB in addition to Agriculture. Hence, the employees are in no way restricted in serving only the agricultural consumers. Also, the 'Employee Options Process' clearly gives the choice to opt for working in TGRPDCL based on his/ her willingness. This is good from an organizational perspective since the deployment of any new personnel is going to increase the time, costs and risks. Like any other distribution company, TGRPDCL is envisaged to have operational challenges, and this is an area where the staff will contribute through their skills and efforts in making the new model a success. Due to the reasons mentioned above, the analogy presented by the objector doesn't seem right for the current proposal.
71.	3. THE NUTSHELL REALITY OF THIRD DISCOM – If perfect metering is done which is missing/not done as on date for recording actual consumption of power being consumed by services, for which as a policy matter, free power is being extended, predominantly to agriculture pumpsets, the ultimate purpose and aim of new upcoming Discom is fulfilled. The present two Discoms in the state are promptly responding, taking best care of agriculture consumers needs, almost at their doorstep. Hence there is no need to create 3 rd Discom.	TGRPDCL submits as follows – As rightly pointed out by the objector, in a scenario where there is no separate DISCOM for agriculture and allied categories, an AE based at Mandal headquarters has to handle all the consumer categories in that area. In the proposed scenario, though the AE may be based at Taluka the number of consumers to be catered to would be lower (since only specific categories are to be covered). This would enable the

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	Present AE/OP head quartered is located at Mandal headquarter, is most convenient for rendering satisfactory services to agriculture consumers covering all the villages falling in that mandal, whereas after formation of TGRPDCL, AE of new Discom is to be stationed at composite Taluka/constituency covering a jurisdiction of more than 100 villages. Agriculture consumers and prospective agriculture consumers for redressal of problems have to travel to composite Taluka/constituency headquarters. Is it convenient to agriculture consumers?	AE to serve the consumers in a better manner thereby improving service quality and consumer satisfaction. In addition, to further enhance consumer interface and grievance handling, TGRPDCL proposes to establish two Consumer Grievance Redressal Forums (CGRFs), which will provide an accessible and dedicated platform for timely resolution of issues. Accordingly, the proposal will result in better service focus, improved responsiveness, and enhanced consumer satisfaction.
72.	As per GOMS NO 44 the agriculture DTR and its associated LT network belongs to TGRPDCL. To look after the theft of material, energy, or malpractices a separate DPE wing and vigilance wings to be created as present DPE wings cannot interfere in the jurisdiction of TGRPDCL. Further it is requested that the Honourable Commission to kindly consider above objections and set aside the grant of licence to TGRPDCL.	It may be noted that Operational ADE are also empowered to book theft and malpractice cases. Further through specific service agreements, TGRPDCL would also avail services from incumbent discoms. Hence, the concern of objector would be addressed.
Response to Ummarji Tabrez		
73.	Division of Buildings and Infrastructure This becomes the biggest practical problem. Questions arise like:	TGRPDCL submits as follows – As per the current proposal, identified network as per GOMs No 44 would be transferred to TGRPDCL from the incumbent discoms..

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	• Who owns existing section offices? • Which DISCOM gets warehouses and stores? • Will substations be shared? • Who maintains common training centers? If not planned properly, confusion and disputes can happen.	There is a Store for each erstwhile district. Construction of sub-store at each of the new districts has been taken up. For optimal and effective utilization of the existing assets – offices/ stores etc, TGRPDCL would be entering into agreement with incumbent discoms for this purpose.
74.	Duplication of Resources. Each DISCOM may need separate: • Offices • Vehicles • IT systems • Store departments • Engineers • Billing systems This increases operational cost.	The proposal is not intended to create parallel or redundant infrastructure, but to enable better organisation, focused operations, and improved accountability, particularly for agricultural and allied consumer categories. Wherever possible, existing infrastructure, manpower, and systems will be utilized through infrastructure sharing agreements. This will avoid additional cost burden. The staff of the new DISCOM would be transferred from the existing DISCOMs, utilities based on the criteria laid out as per the 'Employee Options Process' Hence, existing infrastructure would be utilized. In addition to the above, Integrated District Office Complex (IDOC) would also be utilized. With this arrangement, the employees of TGRPDCL would be based at locations which will enable them to carry out their duties and render services as per relevant guidelines and regulations issued by Hon'ble TGERC from time to time.

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		It is submitted that any marginal increase in administrative expenditure, if at all, will be outweighed by gains in financial discipline, better loss monitoring, improved service delivery, and enhanced accountability arising from the focused structure of TGRPDCL.
75.	Spare Material and Store Management Issues Existing stock like: • Transformers • Conductors • Insulators • AB switches • CT/PT units must be divided carefully. Problems can occur if: • Inventory records are incomplete • One DISCOM gets excess or shortage • Old pending materials are not accounted properly	TGRPDCL submits that it would be entering into service level agreements with the incumbent DISCOMs for utilization of the infrastructure such as Stores, Meter Testing Bench, etc. This arrangement would ensure effective co-ordination leading to smooth operations. The SLAs will be placed before the Commission, ensuring full clarity, enforceability, and accountability.
76.	Equipment Sharing Problems: Some equipment is commonly used: • Breakdown vehicles • Testing equipment • Mobile transformers • Relay testing kits	TGRPDCL submits that it would be entering into service level agreements with the incumbent DISCOMs for utilization of the infrastructure such as Stores, Meter Testing Bench, etc. This arrangement would ensure effective co-ordination leading to

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	After split, sharing responsibility becomes difficult unless a clear agreement exists.	smooth operations. The SLAs will be placed before the Commission, ensuring full clarity, enforceability, and accountability.
77.	Employee Allocation Issues: Employees may face: • Transfer uncertainty • Seniority concerns • Promotion panel changes • Pay structure confusion This usually creates resistance initially.	TGRPDCL submits that it has initiated the 'Employee Options Process' for employees across incumbent DISCOMs, GENCO and TRANSCO. The above process is based on transparent and well laid out criteria which gives clarity to employees.
78.	Manpower Problem in Rural Areas: If many employees from TGNPDCL opt for a new Hyderabad-oriented utility like TGRPDCL, then interior rural areas may face: • Line staff shortages • Delayed breakdown restoration • Reduced patrolling • Transformer maintenance delays • Poor consumer service in remote villages Rural networks already need more manpower because: • Feeders are longer • Agriculture loads are scattered • Fault tracing takes more time • Accessibility is difficult during rains	TGRPDCL submits that the intent of creation of new discom is to improve the quality of supply/ service quality to consumers. The restructuring involves planned and balanced deployment of manpower, ensuring that both TGRPDCL and existing DISCOMs have adequate staff to perform their respective functions effectively. Adequate staff will be assigned and they would be operating from the field offices allocated to them that will enable them to deliver their services in a best possible manner.

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	So if experienced staff shift toward urban postings, the rural DISCOM can become operationally weak very quickly.	
79.	Government Funding Dependency: Agriculture-focused DISCOMs are highly dependent on subsidy reimbursement from the government. If subsidy releases are delayed: • Power purchase dues increase • Contractor payments stop • Maintenance suffers • Transformer replacement delays occur A rural/agriculture DISCOM without strong cash flow becomes financially stressed very fast. That risk is much higher than in urban-heavy DISCOMs where revenue collection is stronger.	Since the objective of the formation of the new discom is to improve the financial position of discoms and improve service quality, GoTG has clearly conveyed its commitment to support free and subsidized electricity to agricultural category. Hence, the risks stated by the objector would be addressed
80.	From a purely technical and field-operation viewpoint: TGRPDCL can work only if: • Agriculture feeders are fully segregated • Smart metering and energy accounting are strong • Government subsidy release is time-bound • Rural manpower protection policy exists • Shared infrastructure agreements are clear • ERP/store systems are integrated	TGRPDCL submits as follows – Agricultural DTRs and downstream assets would be transferred to TGRPDCL from the incumbent discoms. It may noted that agriculture feeder separation is a CAPEX and time intensive exercise. Transformer monitoring units are proposed on agricultural DTRs and infrastructure sharing agreements would be entered with the incumbent discoms. Hence the risks pointed out

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	Otherwise, the risks you mentioned are very real.	by the objector would be mitigated.
81.	In Current Ground Reality Considering: • Existing manpower shortages • Mixed feeder systems • Rural network complexity • Financial dependency on subsidies • Asset-sharing complications a rapid bifurcation may create operational stress initially, especially in rural Telangana areas. Your observations reflect actual utility-management challenges rather than just administrative theory. In case rdss execution to measure agl sales all Agl DTRs are metered and failed in andhrapradesh they are too not fixing meters even though it was part of agreement in RDss is it possible to fix DTR for each DTR and getting consumption and further the meters needs maintance already operation staff opted less how do you think What you are saying is technically very valid. On paper, RDSS-based agricultural energy accounting looks systematic, but in actual field conditions it becomes extremely difficult —especially in large rural networks like TGNPDCL	TGRPDCL submits as follows. Physical survey of all the DTRs across the incumbent discoms commenced and the relevant technical and asset information are being captured through a mobile application built specifically for this purpose. These efforts would enable TGRPDCL to roll-out transformer monitoring units on DTRs in a phased manner.
82.	1. DTR Metering for Every Agriculture Transformer is Extremely Difficult	Appropriate model for implementation would be adopted considering the technical and operational challenges pointed out

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	In rural belts: • DTRs are scattered over huge distances • Many are pole-mounted in isolated fields • Accessibility is poor during rains • Power fluctuations damage meters frequently For thousands of DTRs: • Installation itself is a huge task • Regular testing/calibration is another challenge • Communication failure becomes common in remote GSM areas So technically possible? → Yes Operationally sustainable? → Very difficult	by the objector.
83.	2. Andhra Pradesh Experience Shows the Challenge As you mentioned in Andhra Pradesh: • Many DTR meters stopped working • Communication modules failed • Replacement was delayed • Contractors completed “installation” formally but maintenance became weak Finally: • Utilities again depended on estimation methods • Actual energy accounting weakened	It may be noted that smart metering roll-out across the globe and across States in India has encountered muti-dimensional challenges on many fronts. The model for roll-out to be adopted by TGRPDCL would be considering the learnings from the above roll-out programs and measures to mitigate the concerns raised by the objector.

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	This is a common issue in rural utility projects.	
84.	Meter Maintenance is the Biggest Hidden Problem. People usually focus only on installation targets. But after installation: • CT failures occur • Meter display fails • Communication SIM issues arise • Terminals burn • Lightning damages equipment • Battery failures happen in modems Then somebody must: • Inspect • Replace • Reconfigure • Test accuracy • Restore communication This requires strong field manpower continuously	The points raised by the objector are pertinent in the context of maintenance of meters on DTRs. As mentioned earlier, these would be mitigated through comprehensive service agreements with the implementing agency.
85.	Existing Operation Staff is Already Insufficient Your point here is probably the most important operational concern. Already staff are handling: • Breakdown maintenance • Fuse calls • Transformer failures	The operations and maintenance of the network is proposed to be carried out through staff who would be transferred to TGRPDCL and comprehensive service agreements with the incumbent discoms. Further, the creation of TGRPDCL enables focused deployment of

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	• Tree cutting • Consumer complaints • New service connections • Vigilance support • Load balancing If manpower reduces further because employees opt toward urban-focused DISCOMs, then: • Meter maintenance becomes secondary • Faulty DTR meters remain unattended • Data reliability collapses Then RDSS objectives fail practically.	manpower specifically for agricultural and allied consumers. The proposed staffing plan is based on careful assessment of network requirements, geographical spread, and consumer base. The restructuring involves planned and balanced deployment of manpower, ensuring that both TGRPDCL and existing DISCOMs have adequate staff to perform their respective functions effectively. The staffing plan, as per G.O. Ms. No. 44 dated 17.12.2025, ensures proper supervisory structure and targeted allocation of field staff based on network spread and operational requirements. This will strengthen key activities such as breakdown maintenance, transformer handling, feeder-wise monitoring, and consumer complaint resolution. The above arrangement will enable in maintaining the quality of supply as per the Standards of Performance criteria.
86.	Agriculture Networks are Technically Unstable for Precise Metering Agriculture feeders often have: • Voltage fluctuations • Overloading • Seasonal loading changes • Frequent switching operations • Long LT lines This creates:	Agricultural networks do present additional complexities due to longer network length and seasonal loading patterns. The proposal is to have a dedicated DISCOM to serve agriculture and allied categories only. This is expected to bring in greater management focus on techno-commercial aspects. Accordingly, the concerns raised by objector would be mitigated

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	• Meter inaccuracies • Communication instability • High failure rates Urban metering and rural agriculture metering are completely different operational environments.	
87.	Financial Sustainability is Also Questionable Suppose: • 50,000+ DTR meters installed • Even 10–15% fail yearly Then replacement and maintenance cost becomes very high. If government subsidy release is delayed: • AMC payments stop • Contractors stop maintenance • Communication services get disconnected Then the whole system weakens over time.	A comprehensive installation and O & M service agreement is proposed to be entered with the agency implementing roll-out of Transformer Monitoring Units. Financial sustainability would be met through timely support from GoTG in the form of subsidies for agricultural category.
88.	My Technical View Your concern is realistic: Without: • Strong rural manpower • Dedicated meter maintenance teams	The replies to the objections are covered in the earlier responses.

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	• Feeder segregation • Reliable telecom connectivity • Timely government funding • Continuous O&M budgeting large-scale agriculture DTR metering becomes difficult to sustain accurately in practice. So while RDSS energy accounting is technically correct in concept, the execution in large rural DISCOMs has serious operational limitations unless staffing and maintenance systems are strengthened first.	
శ్రీ చెపూరి చంద్ర గౌడ్, భారతీయ కిసాన్ సంఘ్, సిద్ధిపేట వారికి సమాధానం:		
89.	గత 6 నెలలు వరకు DD లు కట్టిన వారికీ అగ్రిమెంట్ పెండింగ్ అని చెప్తున్నారు. ఎందుకు ? పరిష్కారం ఏమిటి ?	వ్యవసాయ కనెక్షన్ కోసం దరఖాస్తు చేసుకున్న వారికీ ప్రస్తుతం ఉన్న డిస్కామ్స్ పనులు చేపించి కనెక్షన్లు విడుదల చేస్తున్నారు. రైతు డిస్కామ్(TGRPDCL) పూర్తి స్థాయి లో ఏర్పాటు అయినా తర్వాత పెండింగ్ వ్యవసాయ కనెక్షన్లు త్వరితగతిన విడుదల చెయ్యడం జరుగుతుంది.
90.	గతంలో 4900/- రూపాయలు DD కట్టిన వాళ్ళకి(రిమైనింగ్) 4,300/-	గౌరవ ERC మార్గదర్శకాల (Reg 1 of 2026) ప్రకారం చెయ్యడం

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	కట్టించుకొని, ఇప్పటి వర్క్ ప్రకారం కొనసాగిస్తారా? లేదంటే కట్టిన (4900/-) లు వాపస్ ఇచ్చి, టోటల్ 9200/- లు మరల కట్టించుకోండి.	జరుగుతుంది
91.	వరి కోతలు అయిపోయినాయి. కావున పొలాలలో గల లూస్ వైర్లు గల స్థలాల్లో మిడిల్ పోల్స్ వేయిస్తారా? రైతులు నాట్లు వేసే ఢాకా వేచి చూసి పొలాలలో వేయరాదు అని చెప్తారా?	వ్యవసాయ వినియోగదారులకు విద్యుత్ సరఫరా నాణ్యతను మెరుగుపరచే కార్యక్రమం లో భాగంగా లూస్ లైన్స్ సరిచేయడం మరియు మిడిల్ పోల్స్ వెయ్యడం జరుగుతుంది. రైతుల కోసం ప్రత్యేకంగా కొత్త డిస్కం ఏర్పాటు చేయబడినందున, లక్ష్యబద్ధమైన మరియు కేంద్రీకృత సేవలు అందించబడతాయి.
92.	3rd డిస్కామ్ పేరు తో సిబ్బంది ని ఇవ్వకుండా ఉంటే సమస్యలు వస్తాయి. కావున రైతు డిస్కామ్ కు సరిపోను సిబ్బంది ని నియమిస్తారా ? లేదా అడపాదడప సిబ్బంది ని ఇచ్చి రైతులను ఇబ్బంది పెడతారా? తెలియజేయాలని మీతో సవినయముగా కోరుచున్నాము.	ప్రస్తుతం జి.ఓ.ఎం.ఎస్. నెం.44 ప్రకారం 1000 మంది ఆపరేషన్ & మెయింటెనెన్స్ సిబ్బందికి ఆమోదం ఇవ్వబడింది. భవిష్యత్తులో అవసరాన్ని బట్టి మరిన్ని ఉద్యోగులను నియమించబడతారు. అందువల్ల రైతులకు ఎటువంటి అసౌకర్యం కలగదు.
శ్రీ జి. మహేందర్ రెడ్డి, భారతీయ కిసాన్ సంఘ్, సిద్దిపేట వారికి సమాధానం:		

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93.	రైతు డిస్కామ్ (3rd) తీసుకొచ్చినందుకు మాకు సంతోషమే కానీ, ఇందులో కల సమస్యల మీద మాట్లాడేందుకు భారతీయ కిసాన్ సంఘ్ అభిప్రాయం తెలియజేయుటకు మాకు ఏ కింది సమస్యలపై అయిదు నిమిషాలు సమయం ఇవ్వాల్సిందిగా మీతో కోరనైనది. • గ్రామస్థాయి లో ఇదే విధంగా సిబ్బంది ని కొనసాగిస్తారా? 3రెడ్ డిస్కామ్ సిబ్బంది ని నియమించకుండా ఇబ్బందులకు గురి చేస్తారా? ఇంకా ఎక్కువ నియమిస్తారా ?	ప్రస్తుతం జి.ఓ.ఎం.ఎస్. నెం.44 ప్రకారం 1000 మంది ఆపరేషన్ & మెయింటెనెన్స్ సిబ్బందికి ఆమోదం ఇవ్వబడింది. భవిష్యత్తులో అవసరాన్ని బట్టి మరిన్ని ఉద్యోగులను నియమించబడతారు. అందువల్ల రైతులకు ఎటువంటి అసౌకర్యం కలగదు.
94.	రైతులు చనిపోయిన సందర్భాలలో నష్టపరిహారం ఇవ్వడానికి ఏండ్ల సమయం పడుతుంది. ఇంత టైం కాకుండా తొందర గ ఇవ్వలేరా ? ఎందుకు ఇవ్వలేరు?	గౌరవ ERC మార్గదర్శకాల ప్రకారం చెయ్యడం జరుగుతుంది
95.	రైతు డిస్కోమ్ ప్రతి సెక్షన్ కు ఒక వ్యాన్ కేటాయిస్తారా? లేదా?	ప్రస్తుతం అమలులో ఉన్న డిస్కంల విధానాలు మరియు ప్రక్రియనే కొనసాగించబడుతుంది. మరింత సమర్థవంతముగా చెయ్యడం జరుగుతుంది.
96.	లోడింగ్ అన్ -లోడింగ్ లో రైతుల నుండి 1000-2000 ల రూ.లు వాసులు చేస్తున్నారు. ఇది రైతు డిస్కోమ్ లో కూడా కొనసాగిస్తారా?	డిపార్ట్మెంట్ వ్యక్తులు ఎవరికి కూడా డబ్బు ఇవ్వాల్సిన

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	లేదా నియంత్రిస్తారా? ఈ విషయాలలో మాకు స్పష్టత కావాలని కోరుచున్నాము	అవసరం లేదు. TGRPDCL సంస్థ ద్వారానే లోడింగ్ - అన్ లోడింగ్ చెయ్యడం జరుగుతుంది.
శ్రీ కురెల్లి జశ్వంత్ రెడ్డి, భారతీయ కిసాన్ సంఘ్, సిద్ధిపేట వారికి సమాధానం:		
97.	రైతు డిస్కామ్ గురించి మాట్లాడుటకు మాకు రెండు నిముషాలు అవకాశము ఇవ్వగలరని మనవి 1. మన రాష్ట్ర ప్రభుత్వం రైతు డిస్కోమ్ ఏర్పరిచినందుకు స్వాగతం తెలుపుతు ధన్యవాదాలు కుడా తెలియజేస్తున్నాము.	**శ్రీ .కురెల్లి .జశ్వంత్ రెడ్డి గారు** తెలంగాణ రాష్ట్ర రైతు డిస్కం స్థాపనపై వ్యక్తం చేసిన అభిప్రాయాలు, సూచనలు మరియు రైతాంగ ప్రయోజనాల పట్ల చూపిన ఆసక్తికి తెలంగాణ రైతు పవర్ డిస్ట్రిబ్యూషన్ కంపెనీ లిమిటెడ్ తరపున హృదయపూర్వక ధన్యవాదములు తెలియజేసుకుంటున్నాము.
98.	రైతు డిస్కోమ్ ఏర్పరిచిన తరువాత రైతుల సౌలభ్యం కొరకు ప్రతి గ్రామానికి ఒక లైన్ మెన్ మరియు లైన్ ను నియమించగలరు మరియు ప్రతి సెక్షన్ కి ఒక AE ని, 3 మండలాలకు ఒక ADE ని నియమించగలరు . అలాగే ప్రతి డివిజన్ కి ఒక DE ని , జిల్లా కు ఒక SE ని నియమించగలరని మనవి.	ప్రస్తుతం జి.ఓ.ఎం.ఎస్. నెం.44 ప్రకారం 2000 మంది సిబ్బందికి ఆమోదం ఇవ్వబడింది. భవిష్యత్తులో అవసరాన్ని బట్టి మరిన్ని ఉద్యోగులను నియమించబడతారు. అందువల్ల రైతులకు ఎటువంటి అసౌకర్యం కలగదు.

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99.	సిద్ధిపేట జిల్లా లో కాలువలకు DD లు కట్టుటకు పర్మిషన్ ఇవ్వగలరని మనవి.	ప్రస్తుతం అమలులో ఉన్న డిస్కంల విధానాలు మరియు ప్రక్రియలనే కొనసాగించబడతాయి.
100.	గత ఆరు నెలలుగా రైతులు కట్టిన DD లకు పోల్స్ మరియు ట్రాన్సఫార్మర్లు ఇవ్వడం లేదు. దయచేసి శాంక్షన్ చేయగలరని రైతుల పక్షాన మనవి.	వ్యవసాయ కనెక్షన్ కోసం దరఖాస్తు చేసుకున్న వారికీ ప్రస్తుతం ఉన్న డిస్కామ్స్ పనులు చేపించి కనెక్షన్లు విడుదల చేస్తున్నారు. రైతు డిస్కామ్(TGRPDCL) పూర్తి స్థాయి లో ఏర్పాటు అయినా తర్వాత పెండింగ్ వ్యవసాయ కనెక్షన్లు త్వరితగతిన విడుదల చెయ్యడం జరుగుతుంది.
శ్రీ పుసాల నాగేష్, భారతీయ కిసాన్ సంఘ్, సిద్ధిపేట వారికి సమాధానం:		
101.	రైతు డిస్కామ్ (3rd) తీసుకురావడం పట్ల సంతోషమే కానీ, ఇప్పటిలాగా సిబ్బంది ని కేటాయించి రైతులకు ఇబ్బంది లేకుండా చేస్తారా? సిబ్బంది కొరత కారణం చూపి ఇబ్బంది పెట్టి పనులు పెండింగ్ పెడతారా ?	ప్రస్తుతం జి.ఓ.ఎం.ఎస్. నెం.44 ప్రకారం 2000 మంది సిబ్బందికి ఆమోదం ఇవ్వబడింది. భవిష్యత్తులో అవసరాన్ని బట్టి మరిన్ని ఉద్యోగులను నియమించబడతారు. అందువల్ల రైతులకు ఎటువంటి అసౌకర్యం కలగదు.
102.	ఓవర్లోడ్ ట్రాన్సఫార్మర్లు రైతు పొలాలలో గల కేబుల్స్ , వీటికి	వ్యవసాయ వినియోగదారులకు విద్యుత్ సరఫరా నాణ్యతను మెరుగుపరచే కార్యక్రమం లో భాగంగా ఓవర్లోడ్ ట్రాన్సఫార్మర్లు

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	అవసరమయ్యే మిడిల్ పోల్స్ వెయ్యడానికి ఇది సరైన సమయం. వరి కోతలు అయిపోయాయి. ఖాళీ గ ఉన్న పొలాలలో మిడిల్ పోల్స్ వెయ్యడానికి , ఇప్పుడు వేస్తె ఎలాంటి సమస్య ఉండదు. తదుపరి అన్నదాతలు నాట్లు వేసినంక మీరు వేద్దామనుకున్న వేయరాదు. కావున 1) ఓవర్లోడ్ ట్రాన్సఫార్మర్లు2) మిడిల్ పోల్స్ , కేబుల్స్, సరైన సమయానికి వేయించి రైతులకు ఇబ్బంది లేకుండా చూస్తారా? సిబ్బంది కొరత చూపించి జాప్యం చేస్తారా? ఒకవేళ ఆలా చేస్తే రైతుల భాదలు తీర్చే బాధ్యత ఎవరిది? దయచేసి తెలియజేయాల్సిందని కోరుచున్నాము. మాకు భారతీయ కిసాన్ సంఘ్ రైతుల తరపున రెండు నిముషాలు మాట్లాడే అవకాశము ఇవ్వండి	,లూస్ లైన్స్ సరిచేయడం మరియు మిడిల్ పోల్స్ వెయ్యడం జరుగుతుంది. రైతుల కోసం ప్రత్యేకంగా కొత్త డిస్కం ఏర్పాటు చేయబడినందున, లక్ష్యబద్ధమైన మరియు కేంద్రీకృత సేవలు అందించబడతాయి.
Response to Vishnu Vardhan Reddy		
103.	You should provide attest 3 in each discum is advisable with strict implantation and operational powers needed to them to avoid delays and good relationships with customers	The query is not clear in terms of context and requirements; further clarification is needed to provide an appropriate response.
Response to PV Subba Reddy		

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104.	1. Name / Title of the Proposed DISCOM The title of the proposed DISCOM, “Telangana Rythu Power Distribution Company Limited,” is inappropriate and misdirected based on its actual functional mandate: Contradiction with Objectives: According to GO MS 44, dated 17/12/2025, the stated objective of setting up an Agriculture DISCOM in Telangana is to address the poor financial health of existing DISCOMs while keeping the commitment of free power to agriculture. Broad Consumer Base: The mandate extends to providing electricity supply and service connections to consumer categories well beyond individual farmers. This includes lift irrigation schemes, protected water supply schemes (including Mission Bhagiratha), the Hyderabad Metropolitan Water Supply and Sewerage Board (HMWSSB), and municipal water supply systems. It also includes undertaking the electrification works, infrastructure development, strengthening, and expansion of the distribution network required for such supply. Misleading Branding: While agriculture is only one consumer category, naming the company after the Rythu (Farmer) as the sole beneficiary is misleading. The primary beneficiaries of agricultural power are the Government and the citizens in terms of food security, economic stability, and employment.	As per the GOMs No 44, TGRPDCL will be serving agriculture, LIS schemes, CPWS and HMWSSB. It may be noted that major quantum of sales volume in excess of 75% is in the agricultural category. Further in terms of consumer mix, more than 99% of consumers belong to agricultural category. Hence, TGRPDCL submits that the name chosen is quite appropriate and in line with the intent of GoTG in improving service quality to agriculture and allied categories. Through the proposed restructuring model, the related goal of improving the financial sustainability of incumbent discoms is also proposed to be achieved.

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	Financial Restructuring Overstating: The aim to clean the balance sheets of present DISCOMs clearly highlights that the "for the farmer" concept is misdirected. > Our Stance: The proposed title should not be accepted. The sole objective of the proposed DISCOM must be explicitly redefined to meet the supply of assured, quality, and timely power to agriculture and allied sectors only.	
105.	2. Financial Deficiencies and Requirements There are several severe financial deficiencies apparent in the proposed structure: Operational Cash Flows: Unlike existing DISCOMs, the new DISCOM will completely lack day-to-day operational cash flows. It inherits a weak balance sheet, low capital, a heavy subsidy burden, mounting dues from partner consumers (lift irrigation and water supply boards), and a total lack of cross-subsidy options. Right of Way (ROW) Compensation: While revising the financials, assets, and liabilities, the cost of Right of Way (ROW) for running the network through the lands of farmers must be strictly worked out and provided as direct payments to individual farmers. > Our Stance: The Government must release all outstanding arrears	TGRPDCL submits that about 30% of the revenue is from categories other than agricultural consumers. It may be noted that the existing consumers would be served from the existing network of incumbent discoms. The existing network – Agricultural DTRs and downstream assets would be transferred to TGRPDCL. Hence, there no requirement for separate ROW requirements. In case of new consumers electricity supply would be given duly complying with the extant rules and regulations.

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	before the issuance of the license. Permanent budget provisions and timely releases for Annual Revenue Requirement (ARR) demands must be guaranteed.	
106.	3. Distribution Network Infrastructure Prima facie, the new DISCOM has no dedicated network of its own, leaving serious operational gaps unaddressed: Operational Deficiencies: Service, maintenance, and emergency response deficiencies are reported time and again in the present structural setup. These shortcomings must be resolved through mandatory, clearly outlined ways and means. Roadmap Obligation: A detailed technical roadmap must be provided concerning transmission, feeders, Distribution Transformers (DTRs), manpower, and inventory. Feeder Management: DTR metering has severe limitations. Therefore, dedicated feeders must be allotted to manage agricultural supply during seasonal peak demands through hydro and solar power integrations.	TGRPDCL submits that Network assets as per GOMs No 44, dated 17th Dec 25, would be transferred to TGRPDCL from the incumbent DISCOMs (TGNPDCL & TGSPDCL). The above assets will be part of TGRPDCL book of accounts. TGRPDCL will pay the necessary wheeling charges to TGNPDCL, TGSPDCL as the case may be for usage of upstream distribution network assets (33 kV and 11 kV) as part of DISCOM operations. With regard to operational deficiencies, the very objective of creating TGRPDCL is to enable focused attention on agricultural and allied consumers. This will improve service delivery through better monitoring, accountability, and targeted O&M practices, thereby addressing existing service and maintenance gaps. It is further submitted that a comprehensive roadmap, including details on network infrastructure, feeders, DTRs, manpower deployment, and inventory management, will be developed and submitted as part of business plan. The proposal of TGRPDCL formation facilitates improved monitoring of agricultural supply, enabling better load management

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		during seasonal peaks. Allocation of renewable sources to TGRPDCL will ensure to address seasonal peak demand, since the demand profile of consumers transferred to TGRPDCL also aligns with the generation pattern of Renewable Energy sources
107.	4. Power Supply and Sourcing The energy procurement strategy risks placing a heavy financial strain on the state: Subsidy Burden: While a thermal power allocation is required for Demand Side Management (DSM) measures, a 42% allocation will heavily burden the state with a massive subsidy commitment. Renewable Energy Integration: Allocation of renewable power will minimize this commitment. The exact volume required for renewable energy allocation needs to be clearly quantified. Trading Inviability: The concept of power trading is entirely unsustainable for the targeted consumer categories of this DISCOM.	As per the GO amendment G.O.Ms.No.8 dated 08.05.2026, allocation of PPAs between the three DISCOMs shall be done in such a manner that a higher share of Renewable Energy is allotted to TGRPDCL. This will enable TGRPDCL to comply with RCO. Alternate mechanism of RCO fulfilment such as buy-out option will also be examined. Further details of quantum and source wise allocation will be provided in the business plan that will be submitted to commission after the licensee application is approved. Any remaining mismatch will be balanced through use of thermal power by the incumbent DISCOMs and D-to-D purchases. This ensures efficient utilization of the power mix and doesn't entirely depend upon power trading.
108.	5. Corporate Governance and Management The proposed management layout raises substantial transition risks: Board Structure: Constituting the board using the CMDs of the transferor	The current Board of Directors of TGRPDCL draws upon the expertise of the members including the CMD who have led the DISCOM/ departments in successfully meeting the techno-commercial challenges.

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	companies does not represent good governance practice. Inter-DISCOM Friction: Substantial coordination issues will inevitably arise between the existing DISCOMs and the new entity regarding feeder management, metering, DTR jurisdictions, and billing. > Our Stance: An Apex Authority consisting of the Minister, Departmental Secretaries, and the CMDs of all involved DISCOMs must be formed to handle smooth transition management, infrastructure division, staffing, energy allocation, and grid management issues. Furthermore, the ARR and tariff orders require a complete revisit by the Hon'ble Commission.	
Response to Kiran Kumar Vemapati		
109.	As per the filings of TGRPDCL (Telangana Rythu Power Distribution Company Limited) the targeted consumers to be service is not farmers alone. In such scenarios the word 'RYTHU' in the name of proposed DISCOM is deceiving. The filing has no clear mention of how this new exclusive DISCOM helps or benefits the targeted consumers.	TGRPDCL Submits as follows – It may be noted that more than 75% of the electricity sales volume in TGRPDCL is towards agricultural category and in terms of consumer numbers, about 99% of the consumers are agricultural consumers. Hence, the use of the term 'Rythu' for the new discom formation is justified.
110.	The filings has only procedural aspects and has no mention of operational aspect and leave very very less scope to comment on the TGRPDCL licence application. Already CESS, one of the three DISCOMS present as on day, in	It may be noted that one of the key drivers of reforms ushered in by the Electricity Act 2003 is improving accountability by segregation of cost and losses. The proposed step on new DISCOM formation is also based on the above principle.

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	Telangana State is proposed to be merged with TGNPDCL. At one hand one DISCOM is shutting down and I didn't see the purpose of the proposed new TGRPDCL DISCOM.	Based on the current state of operations in CESS, decision was taken by GoTG to merge it with TGNPDCL in the interest of service delivery to consumers. Additionally, it may be noted that both the merger of CESS with TGNPDCL and the creation of TGRPDCL are driven by a common objective i.e., ensuring reliable and quality power supply to consumers.
111.	I am not sure, can a DISCOM is licenced to cater to only some set of consumers? If so, there is possibility of interested parties (private) approach for licence to cater to some set of cherry-pick consumers, so that they are always at profits. Hope this TGRPDCL creation is not setting ground to private DISCOMs to pitch in the field. Do TGSPDCL and TGNPDCL licences also need modification to not serve the set of consumers that are going to be served by TGRPDCL? I didn't see such requests for licence modifications.	TGRPDCL submits as follows - One of the key objectives intended to be achieved through Universal Service Obligation (USO) is to prevent cherry picking of consumers by a DISCOM. This situation usually occurs when it is not attractive for a discom to serve any section of consumers from a technical or commercial standpoint. When it comes to agricultural category, there are many consumers in the inaccessible/ remote areas. As a mandate, TGRPDCL is going to serve all such consumers.
112.	In every ARR and APR DISCOMS are submitting the funds due from the GoTS is reaching in time, then how come such, thousands of crores of rupees, arrears piled up?	Apart from timely receipt of Government Subsidies, gap between the revenue recovery and cost of service is also a key factor to be considered.
113.	When one agriculture customer, if found unfit (for having cattle, small	O & M practices would be fully compliant with the relevant

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	poultry etc.,) how this scenario will be handled. To move that consumer to different category as in the present situation, TGRPDCL is not licenced to do so and retain such consumer in different category. How fatal incidents are addressed and who?	regulations of Hon'ble TGERC and CEA rules on safety. Concerned field officers would handle any safety related matters expeditiously in accordance with above.
114.	The directors of TGRPDCL are also directors for TGNPDCL and TGSPDCL. Doesn't this result in conflict of interest in decision making?	TGRPDCL submits that the current Board composition reflects the transition phase of the new entity. The directors from TGSPDCL and TGNPDCL bring deep sector expertise and knowledge of the existing distribution network, which is essential for a smooth co-ordination with the incumbent DISCOMs. Due process will be followed for appointment of Directors.
115.	Both TGSPDCL and TGNPDCL is short of manpower. Doesn't the movement of staff to TGRPDCL create more workload on the current staff?	TGRPDCL submits that the proposed staffing plan has been designed after considering the structure proposed in the G.O.Ms.No.44, dated 17.12.2025 to ensure proper supervision. The 1,000 O&M staff and artisans will be allocated based on actual field requirements, TGRPDCL will ensure that no employee is overburdened, and that sufficient staff are deployed to maintain reliable service to the consumers.
116.	Share subscription statement is contradicting with that of CA net worth certificate. The CA consultants, PVGR & Associates, issued net worth certificate stating, His Excellency Governor of Telangana as 100% share, with	With reference to the observations raised, it is respectfully submitted that the seven other shareholders reflected in the filings are nominee shareholders of the Hon'ble Governor of Telangana. Their inclusion is purely for compliance with statutory requirements

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	50,00,000 shares, a solo share holder. Whereas the filings state there are 7 other subscribers besides His Excellency. Doesn't it an error by PVGR & Associates. Detailing is missing in filings too. His Excellency Governor to Telangana holds 49,99,993 shares in figures and Forty nine lakhs ninty thousand nine hundred and ninty three shares in words. There is a difference of nine thousand shares between figures number and words number. There is no mention of subscription of TGSPDCL. Is it that TGSPDCL has zero/none shares in TGRPCL? Seems the agencies are in a pass through mode by not observing the details.	and does not dilute or alter the fact that the Hon'ble Governor is the sole beneficial owner of the entire shareholding of the company. Accordingly, the certificate issued by PVGR & Associates, certifying His Excellency as holding 100% of the share capital, is correct and valid in substance. The certificate reflects the true and beneficial ownership of the shares, and the presence of nominee shareholders does not affect the Governor's absolute control and entitlement
117.	If a third DISCOM is needed it should cater to all kind of consumers than a set of consumers if possible with a defined set of geographic location not overlapping with present DISCOMS by reducing the geographic respective location of TGSPDCL and TGNPDCL.	It may be noted that one of the key drivers of reforms ushered in by the Electricity Act 2003 is improving accountability by segregation of cost and losses. The proposed step on new DISCOM formation is also based on the above principle.
118.	I believe the third DISCOM creation, that too with word "RYTHU" in its name, is to deceive the farmers of Telangana state and people that they care most for farmers which in fact is not the practical case on ground.	TGRPDCL Submits as follows – It may be noted that more than 75% of the electricity sales volume

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	This new DISCOM will only create more clumsy and operations conflicts than more catering the targeted consumers. I believe the grant of DSCOM licence to TGRPDCL as such in the filings is unwarranted and I oppose the TGRPDCL licence application in the current form. I pray the honorable commission to examine the highlighted points in detail and reject or return the TGRPDCL DISCOM Licence application.	in TGRPDCL is towards agricultural category and in terms of consumers, about 99% of the consumers are agricultural consumers. Hence, the use of the term 'Rythu' for the new discom formation is justified.