

Date: 14.05.2026

To  
Commission Secretary, TGERC,  
Vidyut Niyantran Bhavan, GTS Colony  
Kalyan Nagar, Hyderabad

Sir,

**Sub:** Formation of TGRPDCL, out of the 2 Nos of existing TGDISCOMs-Objections Submitted-Regarding.,

**Ref:** Public Notice Dt: 18.04.2026 issued by CMD/TGRPDCL in OP No: 11/2026, inviting objections

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I, Tuljaram Singh Thakur on behalf of the electricity consumers in the state of Telangana, may be permitted to file the following objections-

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.

Key Objections/Observations are submitted as below-

1. 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?
2. Directors of TGRPDCL are same as the Directors of the other 2 DISCOMs. How can the TGRPDCL act independently then?
3. 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?
4. 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?

5. 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.
6. 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.
7. 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 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.
8. 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?
9. 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 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.
10. 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.

11. 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?
12. 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?
13. 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?

Hon'ble commission is requested to kindly consider above objections before grant of License to TGRPDCL.

*Thanking you Sir,*

Yours faithfully

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