



**Mytrah Energy (India) Private Limited**  
(Formerly known as Mytrah Energy (India) Limited)  
(CIN: U40108TG2009PTC065804)  
# 8001, Survey No.109, Q-City, Nanakramguda,  
Gachibowli, Hyderabad - 500032, Telangana, India.  
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MEIPL/TSNPDCL/2022-23/27012022

Date: 27 Jan 2022

To

**The Chief General Manager (IPC&RAC)  
TSNPDCL, H.NO. 2-5-31/2, Vidyuth Bhavan,  
Nakkalagunta, Hanumakonda-506001,  
Telangana.**

✓ **The Secretary,  
Telangana Electricity Regulatory Commission  
5<sup>th</sup> Floor, Singareni Bhavan, Red Hills,  
Hyderabad-500 004.**



Dear Sir,

**Sub: Objections of Mytrah Energy (India) Private Limited on the ARR proposed by TSNPDCL for the FY 2022-23.**

**Ref: ARR filings proposed by TSNPDCL for the FY 2022-23 vide public notice dated 29.12.2021 uploaded on website of TSERC**

We invite reference to ARR filings proposed by TSNPDCL, TSNPDCL for the FY 2022-23 vide the public notice dated 29.12.2021 and the details of ARR uploaded on website of TSERC.

**Name and Address of Objector:**

Mytrah Energy (India) Private Limited  
8001, Survey No.109, Q-City, Nanakramguda,  
Gachibowli, Hyderabad- 500 032

**Brief Details of Views/Comments:**

- 1. Solar Generation:** TS Discoms have considered the NCE Generation Solar in the power purchase cost. NCE generation = Solar 1644.26 MUs, Tariff= Rs 5.69/kWh

**Comment:**

- It is observed that DISCOMs has considered 21% CUF for Solar Generators in their ARR proposal. However DISCOMs should consider the total energy delivered at interconnection point and also to pay the payments towards total energy delivered as per PPA terms. On this premise of considering lower



generation from NCE (Solar), DISCOMs shouldn't Curtail the power from RE generations as they have to comply the MUST RUN status in accordance to the IEGC GRID code 2010.

**Request to Hon'ble TSERC:**

- It is requested to issue necessary directions to TS Discoms in following the Grid Code and Must run status accorded to NCE projects.

**2. Measures to Reduce Aggregate Technical Loss**

- As per the proposed ARR fillings for FY-2022-2023, Distribution losses are targeted to decrease from 9.13% in FY 2020-21 to 6.99 % in FY 2022-23 by conducting 11 kv feeder wise energy audits, installation of additional capacitor banks etc thereby decreasing the power purchase cost.

**Comment:**

- From the proposal, we understand that Discoms are making their efforts to improve their balance sheet and make themselves a self-reliant cash rich DISCOM.

**Request to Hon'ble TSERC:**

- Accordingly, we request TSERC to direct the DISCOMs to pass on the savings generated through reduction in Technical losses towards reducing the average payables to generators.

**3. Tariff Hike**

- From the ARR filings for FY 2022-23 Discoms have proposed a tariff hike in fixed and energy charges including customer charges. Fixed charges increased by Rs 100/kVA for industrial customer and energy charges of 50 paisa for all domestic consumers and 1 rupee for all industrial consumers resulting in overall increase of thereby expecting an increase of Rs 6,830 crores for a year.

**Request to Hon'ble TSERC:**

- This is a welcome step by the DISCOMs and the revenues generated by the tariff hike should be effectively used in repaying the energy bills to the generators timely.

**4. Late Payment Surcharge (LPS) on Delayed payments:**

- From the proposed ARR for the FY 2022-23, it is observed that Discoms have not considered cost for Late payment surcharge against the Energy bill's.



**Comment:**

- As per the terms of PPA, in case of delayed payments beyond due date, the generators are entitled to interest on delayed payments at rates specified in PPA. The average receivable period is ranging anywhere between 6 to 12 months as seen from payment history by TS Discoms to wind and solar projects and Discoms are unilaterally waiving off the late payment surcharge which is otherwise payable to wind & solar projects as per PPA. Therefore, Discoms should consider the cost equivalent to Late payment Surcharge (LPS) for a period of 06 months on delayed payments in their ARR proposal for FY 2022-23 which enables Discoms to pay LPS as per the terms of PPA. By adoption of any efficiency measures, if Discoms could reduce the average payable period to generators, LPS amount filed/claimed under ARR could be used to set off in future.

**Request to Hon'ble TSERC:**

- Non- Allocation of funds in the ARR would lead to unavailability of funds to clear the past due's which would have a cascading effect on the generator financial situation.
- Therefore, we request Hon'ble TSERC to issue directions to DISCOMs to consider the Late payment Surcharge for a delay period of 06 months in their ARR proposal instead of filling True-Up petitions and considering the Time value of Money.

In view of the above cited suggestions, we request your good selves to ensure that the interest of the renewable industry is protected and Generation of clean energy continues. We look forward to render our services with best of our abilities in the renewable sector for all times to come!

Thanking you,

Yours faithfully

For **Mytrah Energy (India) Private Limited**

A handwritten signature in blue ink, appearing to read "K. Maheshwari".

**Authorised Signatory**

