

At this juncture, it is pertinent to mention here that as per the Judgment of Hon'ble APTEL dated 22 July 2011 in appeal No.12 of 2011 (*G.M.R. Hyderabad International Airport Ltd Vs. Andhra Pradesh Electricity Regulatory Commission & Anr.*) herein Hon'ble APTEL held that Airports could not be put in the commercial category **and on the other hand must be put in a separate category and different tariffs should be determined as per direction of the Appellate Tribunal of Electricity.**

Accordingly, based on TGSPDCL Load Assessment Report and complexities in segregation of airport loads, the Hon'ble Commission vide its earlier order dated 30 March 2012 had created a separate tariff category for airports i.e. HT-III category and fixed a composite tariff at a ratio of Aviation loads at 61% and Commercial loads at 39%.

However, with respect to the Hon'ble Commission's directives to TGSPDCL and TGSPDCL's request thereon, GHIAL took steps for implementing segregation of the non-aviation loads and aviation loads outside the terminal at source level and a new 220/33KV Substation was built by GHIAL at a cost of around INR 15 Crores, which was handed over to TGTRANSCO to facilitate the segregation of loads and this Substation was energized by TGTRANSCO on 22nd July, 2020.

Thereafter, GHIAL applied to TGSPDCL for two new HT services (HT-II Commercial and HT-I Industrial) from the aforesaid Substation. Consequently, all major non-aviation loads from the airport network were segregated by laying separate network at an additional cost and got the connected to the new HT Service connections in presence of TGSPDCL officials. With the above, Airport now has three HT Services with separate metering at Source Level.

- ▶ HT-III Aviation Service at 220 KV Voltage
- ▶ HT-II Commercial Service at 33 KV Voltage
- ▶ HT-I Industrial Service at 33 KV Voltage

With the above, segregation of major non-aviation loads from the existing aviation network at source level (DISCOM's metering point) as requested by TGSPDCL for complying to the directives of Hon'ble Commission is completed. While so, smaller non-aviation loads at lesser voltage levels are not feasible for segregation at source level, due to the complexities involved in existing distribution network. For these loads such as advertisement hoardings across main access road and BPCL petrol bunk, separate energy meters were installed by TGSPDCL at consumption level and being billed at the applicable rates in the main bill.

Since the major non-aviation loads have been segregated and resultantly, the load pattern ratios have changed as per table provided herein below and GHIAL had already submitted details of the of the said loads with TGSPDCL their perusal and the necessary revision and yet no revision has been made.

Sl No	Type of Load	Before Load Segregation	After Non-Aviation Load Segregation
1	Aviation	61%	80%
2	Non-Aviation	39%	20%

In view of the above, the proposal of TGSPDCL of equating energy charges for HT-III category at par with the energy charges for HT-II commercial tariff category is arbitrary and contrary to earlier directions issued by Hon'ble APTEL and by this Commission and should not be considered.



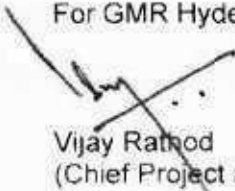
2. As per para 11.2.5 (HT-III) Airports, Bus Stations and Railway Stations The licensee proposes an increase in demand charge for all voltage levels (11kV, 33kV, 132kV&above) and an **increase in energy charges making it same for all voltage levels (11Kv, 33kV, 132kV & above)**

Comment: The proposed increase in energy charges for consumers having energy meters at 220KV, 33KV and accounting for all transformer and distribution losses, applying an 11KV voltage level tariff isn't justified and disregards the technical differences. This discrepancy may lead to unfair pricing and affect consumer interests as a common tariff might not accurately reflect the actual energy costs and losses associated with different voltage levels.

In view of the above cited suggestions, we request your good selves to consider the same while finalizing the retail tariff proposal of TGSPDCL. Further, we would request the Hon'ble Commission to afford us with an opportunity to be heard during the course of the hearing to enable us to further elaborate on the suggestions made herein above.

Thanking you.

For GMR Hyderabad International Airport Limited


Chief Project & Engineering Officer
GMR Hyderabad International Airport limited
Rajiv Gandhi International Airport Limited

Vijay Rathod
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