



**Southern Power Distribution Company of Telangana Limited**  
#6-1-50, Corporate Office, Mint Compound, Hyderabad 500 063  
Phone No.(040) 2343 1008 Fax Nos.(040) 2343 1395/1452  
website [www.tssouthernpower.com](http://www.tssouthernpower.com)

From  
Chief Engineer (IPC),  
TSSPDCL, Corporate Office,  
6-1-50, 1<sup>st</sup> Floor, Mint Compound,  
Hyderabad – 500 063.

To  
The Commission Secretary,  
TGERC, Vidyut Niyamtran  
Bhavan, Sy.No.145-P,  
G.T.S. Colony, Kalyan Nagar,  
Hyderabad 500 045

Lr No.CE (IPC)/DE(IPC)/F. ARR/D. No. 964 /24, dt: 11.10.2024

Sir,

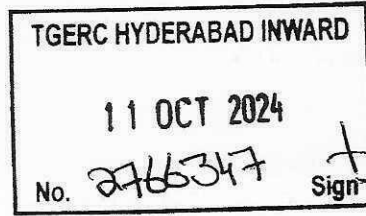
Sub:- TGSPDCL – IPC –TGTRANSCO ARR filings for Transmission Business for  
5<sup>th</sup> MYT for the period (FY 2024-25 to FY 2028-29) – comments by  
TGDISCOMs – Submission - Regarding.

Ref:- Public Notice by TGTRANSCO, dated: 20 sep 2024.

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Adverting to the notice, the remarks of TGDISCOMs in O.P. No 14 of 2024 filed  
by TGTRANSCO towards filings made by TGTRANSCO for Transmission Business for  
5th MYT for the period (FY 2024-25 to FY 2028-29) are herewith submitted for  
consideration.

Encl: As above



Yours faithfully,

  
K. Ramulu  
Chief Engineer (IPC)  
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Ph:-+91 94906 03671

Copy to

The Chief Engineer/Comml&RAC/TSTRANSCO

*JDC(76)/JDC(76)*  
*11/10/2024*

**Observations of TSDISCOMs:**

**Comments on "TGTRANSCO filings for Annual Performance Review (APR) of Transmission Business for FY 2023-24"**

1. Taxes for FY 2023-24 may be allowed as per the Income Tax Return under section 115JB of Income Tax Act 1961 under Minimum Alternative Tax (MAT) provisions and as per actuals.
2. There is a huge deviation in RoCE amount from the approved values in MYT to an extent of Rs. -443.98 Crs on the one hand. On the other hand, it was observed that the decrease in the depreciation amount claimed is not comparable as such and the taxes claimed are on the higher side. Hence, it is prayed to allow the depreciation and taxes claimed after prudent check.
3. TGTRANSCO has claimed a decrease in non-tariff income. Clarification for such a steep decrease is not provided in the filings. The Hon'ble Commission may allow the NTI after prudent check.

**Comments on "True-up of ARR for 4<sup>th</sup> CP (FY 2019-20 to FY 2023-24)"**

1. TGTRANSCO has claimed Rs.144.26 crores against O&M expenses for the FY 2022-23 stating the PRC -2022 as justification in Table a ARR deviation in the filings. In this regard it is to submit that Hon'ble Commission has factored-in the impact of PRC 2022 while issuing the order dated 07.06.2024 in OP.No.2 of 2024 for APR 2022-23. TGTRANSCO is again claiming Rs.144.26 crores over and above the amount approved in the APR -2022-23 order stating the same reason. Hence, it is prayed to disallow the said amount.
2. The commission has already finalized Depreciation and RoCE for Control Period 2019-24 (except for FY 2023-24) vide year wise APR orders. TG Transco is now again claiming as per actuals (over the above amount already approved in year wise APRs) under True-up of control period 2019-24. Hence, it is prayed to disallow the said amount.
3. It is observed that the works proposed to be taken up by TGTRANSCO in the filing of MYT of 4<sup>th</sup> control period year wise are not executed as per the schedule, as such the interest during construction (IDC) will be increased. TGTRANSCO may be directed to provide justification for delay in execution for works. The Hon'ble commission is prayed to allow the IDC as per the justification provided by TGTRANSCO for delay and after prudent check.

Other Observations of TGDISCOMs:

- Adjustment of transmission charges in the ARR of TGTRANSCO for interstate lines as approved by CERC :

Petition No.	Order Dated
2/TT/2019	13.01.2020
325/TT/2022	01.01.2024
330/TT/2022	01.08.2024
125/TT/2022	02.08.2024

It is to submit that the Hon'ble CERC vide above tabulated orders have determined the tariff of certain lines pertaining to TGTRANSCO considering them as interstate transmission lines for the control period 2014 -2019 and the same are to be included in PoC charges. The copy of the orders issued by CERC are enclosed for reference. Hon'ble CERC has directed to adjust the transmission charges allowed in the said orders against the ARR approved by the state Commission. Clarification may be provided by TGTRANSCO whether the amount towards the transmission charges for the interstate lines is factored in while arriving the transmission charges for the 5<sup>th</sup> Control period . Also, TGTRANSCO may be directed to provide the status on inclusion of said charges of interstate lines in the PoC charges.

- Hon'ble CERC have considered only O&M expenses and Interest on working capital only to arrive at the transmission charges for the lines whose life is more than 25 years considering the useful life of transmission lines as 25 years.

In view of the above TGERC is requested to adopt the same methodology for the intra- state lines for which the life is more than 25 years and for the length of the line which is to be considered as intra-state partially and partially inter-state (for which CERC has already adopted the said methodology) for which the life is more than 25 years.



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