



To

Date:31-01-2023

Telangana State Electricity Regulatory Commission,
D No. 11-4-660, 5th Floor,
Singareni Bhavan, Red Hills, Hyderabad – 500004.

Sir,

**Subject: Levy of electricity tariffs – TS Public Notice date 21-12-2022,
Objections- Reg. under Industrial category**

**Reference: Public Notice dated 21-12-2022 regarding tariff fixation for FY
2023-24**

1. With reference to above mentioned letter of TSERC asking for comments of stakeholders on electricity tariffs for FY 2023-24, we wish to thank you for giving us opportunity to raise our request on electricity tariff on telecom industry. Presently the telecom industry is being charged commercial rates as against industrial rates resulting in undue financial burden on telecom industry which works round the clock like any other industry.
2. The telecom sector as the backbone of digital infrastructure of the nation, is set to be the force-multiplier for many other sectors as well. In present times, Telecom is effectively an essential service similar to access for water and electricity. It is a key driver of economic and social development in an increasingly knowledge intensive global scenario.
3. We wish to bring to your kind notice that the Government of Telangana State vide its IT Policy 1. Telangana ICT Policy Framework 2016, 2. Telangana DATA Centres Policy 2016 (copy enclosed), has allowed the IT companies operating in Telangana State to pay industrial tariff for their power consumption. **24x7 Telecom Connectivity is essential and a prerequisite for seamless IT operations.** Therefore telecom network is also an integral part of IT eco-system. In fact, Telecom Connectivity is essential not only for IT operations but also for almost all important infrastructure to enable various services such as Digital Payments, Industry 4.0 (connected Industries), Remote Education and other infrastructure such as Power Sector which harness the benefits of Machine to Machine (M2M) connectivity.
4. Further, with the launch of 5G, we are at the cusp of embracing another round of digital revolution. 5G technology is well poised to bring in revolutionary changes in the areas of health, agriculture, road safety, gaming, logistics, manufacturing, education, drones, smart cities, smart homes etc. Availability of 5G networks would necessarily require network densification through low distance small cells. **There will be a need for EB connections around the state for this massive deployment of 5G small cells.**
5. Currently there are more than 7 lakh towers deployed in India. The National Broadband Mission (NBM) has set targets of 12 lakh mobile towers by the end of 2023 & 15 lakh by

the end of 2024. In order to achieve the NBM target of 50 lakh km of fiberization, 70% of tower being fiberized, and 50 megabits per second broadband speed, enhanced fiberization is a must¹.

6. High electricity tariffs are one of the biggest challenges faced by the rapidly growing telecom tower industry in India. **It is estimated that almost 30 percent of the tower's OPEX is accounted for the towers are related to electricity tariffs, a significant portion².**
7. There is a strong need of cross-sector collaboration between the power sector and telecom sector, which will not only reduce the cost for telecom companies but **Discoms will also get a new revenue stream.**
8. In view of the above, **we humbly request that in the State EB Tariff Orders, Telecom Industry electricity tariff may kindly be placed under Industrial rates rather than the commercial rates to bring the tariff on par with the IT services and other industries.**

We are looking forward to your kind consideration and support on this matter.

With warm regards,

Yours Sincerely,

Summit Digitel Infrastructure Limited

For **SUMMIT DIGITEL INFRASTRUCTURE PVT. LTD.**

Authorized Signatory

Authorised Signatory

Enclosure: 1. Acknowledgement Copies of the submission of letters submitted to CMD, Hanumakonda & Hyderabad, dt.31.01.2023.

To,
The Chairman & Managing Director,
Northern Power Distribution Company of Telangana Limited,
Hanaumakonda

Date: 30-01-2023

**Subject: Levy of electricity tariffs – TS Public Notice dated 21-12-2022,
Objections – Reg.**

Sir,

I Shri Praveen Kumar Malka, son of M Damodar Rao, aged 45 years, residing at 1-7-4/A/204, Kamal Nagar, Vishals Park View, Secunderabad, Hyderabad-500062, do hereby solemnly affirm and state as follows:

1. I am the Authorized Signatory of Summit Digital Infrastructure Limited, Circle Office at Lakeshore Towers, Rajbhavan Road, 4th floor, Hyderabad, and I am duly authorized to make this affidavit on its behalf.
2. The Statements provided in the enclosed format as per the notice format for objections is true to my knowledge and the statements made in enclosed format are based on information provided by the Telangana State Government IT Policy, 2016.

Summit Digital Infrastructure Limited

For **SUMMIT DIGITAL INFRASTRUCTURE PVT. LTD.**

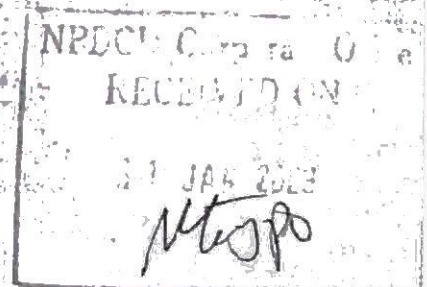
Authorized Signatory

Authorised Signatory

Copy to:

1. Commission Secretary TSERC,
2. Summit Digital Infrastructure Limited

Enclosure : Details filled in as per Notice format enclosed.



Objections :

Name & Full Address of the Objection along with email id and contact number	Brief Details of objections/suggestions against ARR, FPT, CSS and True up proposals of [TSNPDCL]	Whether copy of Objections suggestions & proof of delivery at Licensees office enclosed (Yes/No)	Whether Objector want to be heard in person (Yes/No)
<p>Mr. Praveen Kumar Malka, Summit Digitel Infrastructure Limited, Lakeshore Towers, 4th Flr, Somajiguda, Rajbhavan Raod - 500082, Email ID: praveen.malka@ril.com, Mobile No:6301753997</p>	<p>The Objections are as per the Telenagana State Government Policy :</p> <ol style="list-style-type: none"> 1. Telangana ICT Policy Framework 2016 , 2. Telangana DATA Centres Policy 2016, 3. 	<p>yes</p>	<p>Yes</p>

To,
Chairman & Managing Director,
Northern Power Distribution Company of Telangana Limited,
Hanumakonda.

Date:30-01-2023

**Subject: Levy of electricity tariffs – TS Public Notice date 21-12-2022,
Objections- Reg. under Industrial category**

**Reference: Public Notice dated 21-12-2022 regarding tariff fixation for FY
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4. Further, with the launch of 5G, we are at the cusp of embracing another round of digital revolution. 5G technology is well poised to bring in revolutionary changes in the areas of health, agriculture, road safety, gaming, logistics, manufacturing, education, drones, smart cities, smart homes etc. Availability of 5G networks would necessarily require network densification through low distance small cells. **There will be a need for EB connections around the state for this massive deployment of 5G small cells.**
5. Currently there are more than 7 lakh towers deployed in India. The National Broadband Mission (NBM) has set targets of 12 lakh mobile towers by the end of 2023 & 15 lakh by the end of 2024. In order to achieve the NBM target of 50 lakh km of fiberization, 70% of tower being fiberized, and 50 megabits per second broadband speed, enhanced fiberization is a must¹.
6. High electricity tariffs are one of the biggest challenges faced by the rapidly growing telecom tower industry in India. **It is estimated that almost 30 percent of the tower's**

¹ <https://www.timesnownews.com/business-economy/industry/mobile-tower-industry-requests-power-ministry-to-review-electricity-tariffs-article-92962900>

OPEX is accounted for the towers are related to electricity tariffs, a significant portion².

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With warm regards,

Yours Sincerely,

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For **SUMMIT DIGITEL INFRASTRUCTURE PVT. LTD.**

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² <https://www.outlookindia.com/business/dipa-seeks-power-tariff-review-as-rise-in-mobile-towers-set-to-increase-sector-s-opex-news-210072>

To,
The Chairman & Managing Director,
Southern Power Distribution Company of Telangana Limited,
Mint Compound, Hyderabad



**Subject: Levy of electricity tariffs – TS Public Notice dated 21-12-2022,
Objections – Reg.**

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<p>Mr. Praveen Kumar Malka, Summit Digitel Infrastructure Limited, Lakeshore Towers, 4th Flr, Somajiguda, Rajbhavan Raod - 500082, Email ID: praveen.malka@ril.com, Mobile No:6301753997</p>	<p>The Objections are as per the Telenagana State Government Policy :</p> <ol style="list-style-type: none"> 1. Telangana ICT Policy Framework 2016 , 2. Telangana DATA Centres Policy 2016, 3. 	<p style="text-align: center;">Yes</p>	<p style="text-align: center;">Yes</p>

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