



**Zuari Cement**  
HEIDELBERGCEMENT Group

**Zuari Cement Limited**  
CIN: U26942AP2000PLCO50415  
Sitapuram Power Plant,  
Sitapuram, Dondapadu Village,  
Chinthala Palem Mandal,  
District Suryapet,  
Telangana State - 508246  
Website: www.zuaricements.com

To,  
The Secretary,  
Telangana State Electricity Regulatory Commission  
11-4-660,5<sup>th</sup> Floor,  
Singareni Bhavan, Red Hills  
Hyderabad- 500 004.

Date : 30/01/2023

Respected Sir,

Sub: Submission of suggestions/objections in the matter of Retail Supply business for approval of ARR & FPT and CSS for FY 2023-24.

With reference to the public notice dated 21/12/2022 ,Inviting objections and suggestions on the subject proposals, is here by submitting its suggestions/objections in the matter of Retail Supply business for approval of ARR & FPT and CSS for FY 2023-24 filed before Telangana State Electricity Regulatory Commission by TSSPDCL.

Request you to accept our additional objections if any,at the time of public hearing and also give us the opportunity to present our objections in person at Public Hearing.

We request your goof office to consider our submission are enclosed here for further process.

Thanking You

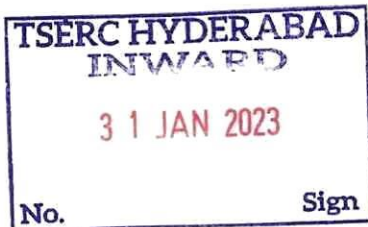
Yours Sincerely,

  
Plant Head  
Zuari Cement Limited



Enclosed

- 1) Suggestions/Objections on the Aggregate Revenue Requirement & Tariff proposals Retail Supply Business for FY 2023-24



### Telangana State Electricity Regulation Commission Objections/Suggestions Application Form

Submission of objections/suggestions on the Augmentate Revenue Requirement and Tariff proposals Retail Supply Business for the FY 2023-2024

Address of the person & Full details	Brief Details of Suggestion(s)	Objection on TSSPOCL Proposed Tariff	Whether copy of the Objection & Proof of Delivery at Licensee office enclosed	Whether Objector wants to be heard in Person
<p>K. Paparao Plant Head Zuari Cement Limited Sitapuram Power Plant-43MW (HT SPT-543) Dondapadu, Chintalapalem Mandalam, Suryapet District, Telangana-508246.</p>	<p>Financial year 2023-2024, TSSPOCL has proposed parallel operation charges / Grid Support Charges on all the generators (Captive Generating Plants, Cogeneration Plants, Third party Generation units, Merchant Power Generation units, Rooftop Power Plants etc.) who are not having PPA/having PPA for partial capacity with the licenses as follows: Grid Support Charges = Total Installed Capacity X Rate of GSC (Rs./KW/month) Rate of GSC: i. The parallel operation/grid support charges are to be applied to the total installed capacity of the generators connected to the Grid. ii. Conventional generators shall pay Rs.50 per KW per month. iii. Renewable energy plants including waste heat recovery plants, the plants based on municipal solid waste, and the co-gen plants shall pay Rs.25 KW per month. iv. Rooftop solar plants under net metering/gross metering policy shall pay Rs.15 per KW per month. v. Co-gen sugar mills shall pay charges of Rs. 25 per KW per month, for a period of 4 months or actual operation period, whichever is higher. vi. These charges shall not be applicable when the plants are under shutdown for any reason and when such shutdown period exceeds two months. vii. To the extent of PPA capacities of the generators with the DISCOMs shall be exempted from payment of these charges.</p> <p><u>Suggestions</u> The following are the suggestions to the proposed GSC: a) The GSC fee has not considered the exemption of GMD from the installed capacity. b) The formula for the GSC i.e. Rs. 50 for conventional generators is not mentioned, so is the case with non-conventional GSC. The formula may be disclosed upfront to avoid any arbitrariness. c) Exemption available in case of shutdown for any reason that exceeds two months, which pre-supposes that the period of two months is continuous. Instead the same may be taken as overall period of two months of shutdown during the year, i.e. the periods of shutdown during the year, if the aggregate period of such shutdown exceeds two months.</p>	<p>Our objections to the proposal of GSC as under: There is no reference of the calculation of GSC. In the absence of the same, the justification for the fixing up of tariff appears to be arbitrary, irrational and without any ground. Earlier periods the below mentioned formula was used for fixing GSC. GSC = A * (B+C+D) * Contract demand charges / 2 Where: A - CPP capacity; B - Contracted Demand; C- Any other sources of supply; D – Any export of power Therefore, it is imperative to disclose the formula for fixing the GSC Tariff. It is also requested to consider the present energy scenario in Telangana before fixing any charges. The following is the energy scenario in TS the overall energy scenario for the Telangana state there is surplus energy of 13441 Million Units. This surplus energy in Telangana indicates that GRID is healthy and it is not loaded and the impacts of connected generators will be minimal to that extent hence the GSC charges should be levied reasonably for the generators. Any increase in the variable cost of generation, shall lead to financial burdens on the generators, which lead to layoffs of the generating units resulting in un-employment.</p>	<p style="text-align: center;">Yes</p>	<p style="text-align: center;">Yes</p>

Plant Head  
For Zuari Cement Limited

