

SOUTHERN POWER DISTRIBUTION COMPANY OF TS LIMITED



RESPONSES TO OBJECTIONS / SUGGESTIONS

On

ARR & Tariff Filings Proposals of Retail Supply Business for FY 2015-16

INDEX

Sl.No.	Name of the Objector	Page- No
1	Swamy Jaganmayananda, Husnabad Village, Kodangal Mandal, Mahaboobnagar District	10
2	Venkateswarlu Gadipudi, Dy. GM Legal, AP&T, Vodafone South Limited	13
3	M. Venugopala Rao, Senior Journalist & Convener, Centre for Power Studies, H.No.7-1-408 to 413, Flat No.203, Sri Sai Darsan Residency, Balkampet Road, Ameerpet, Hyderabad	14
4	P. Kodanda Ramaiah, 712, Turquoise Block, My Home Jewel, Madinaguda, Hyderabad - 49	52
5	G. Prabhakar Rao, Plot No.241/102, Opp:Jaya Residency, Electric Tower Line Road, Jayanagar, Kukatpally, Hyderabad - 72	54
6	పి.ఎస్.ఆర్. కృష్ణప్రసాద్, ఇంటి నెం. 5-5-23/21, సంగీత్ నగర్, కూకట్ పల్లి, హైదరాబాద్ - 500 072	56
7	Thimmareddy, Convenor, People's Monitoring Group on Electricity Regulation, 139, Kakatiya Nagar, Hyderabad - 500008	60
8	Ferro Alloys Producers Association represented by Sri M.R. Prasad	95
9	నారాయణ రెడ్డి, అమ్మడాపురం (గ్రా), మొయినాబాద్ (మ), రంగారెడ్డి జిల్లా	104
10	శంకర్, మాజీ సర్పంచ్, తోలుకట్ట (గ్రా), మొయినాబాద్ (మ), రంగారెడ్డి జిల్లా	
11	కావలి భిక్షపతి, బాదుర్ గూడ, శంషాబాద్ (మ), రంగారెడ్డి జిల్లా	
12	జి. బుచ్చి రెడ్డి, మహా లింగాపూర్ (గ్రా), శంకర్ పల్లి (మ), రంగారెడ్డి జిల్లా	
13	ఆర్. గోపాల్ రెడ్డి, చిన్న శంకర్ పల్లి (గ్రా), శంకర్ పల్లి (మ), రంగారెడ్డి జిల్లా	106
14	మాది రెడ్డి రాజి రెడ్డి, భారతీయ కిసాన్ జిల్లా అధ్యక్షులు, 20-160/1/1; R .బ. నగర్, శంషాబాద్ (మ), రంగారెడ్డి జిల్లా	
15	మాచాన్న గారి రామ్ రెడ్డి, భారతీయ కిసాన్ మండల అధ్యక్షులు, మహా లింగాపూర్ (గ్రా), శంకర్ పల్లి (మ), రంగారెడ్డి జిల్లా	
16	ఎం. ప్రభు సాగర్, రామం జీవూర్ (గ్రా), శంషాబాద్ (మ), రంగారెడ్డి జిల్లా	
17	దేవిరెడ్డి, లక్ష్మా రెడ్డి గూడ (గ్రా), శంకర్ పల్లి (మ), రంగారెడ్డి జిల్లా	108

18	జనార్ధన రెడ్డి, గాజులగూడ (గ్రా), శంకర్ పల్లి (మ), రంగారెడ్డి జిల్లా	
19	CH. అనంతమ్మ, మహా లింగాపూర్ (గ్రా), శంకర్ పల్లి (మ), రంగారెడ్డి జిల్లా	
20	ఎం. రామదాస్, మహా లింగాపూర్ (గ్రా), శంకర్ పల్లి (మ), రంగారెడ్డి జిల్లా	
21	ప్రకాష్ చారి, మహా లింగాపూర్ (గ్రా), శంకర్ పల్లి (మ), రంగారెడ్డి జిల్లా	
22	సురేందర్ రెడ్డి, బాబా గూడ (గ్రా), షామీర్వేట్ (మ), రంగారెడ్డి జిల్లా	
23	గజేందర్, నాగారకుంట (గ్రా), షాబాద్ (మ), రంగారెడ్డి జిల్లా	111
24	K. Raghu, Coordinator, Telangana Electricity Employees Joint Action Committee, 108, A-Block, Vidyut Soudha, Khairatabad, Hyderabad	112
25	J.Nageswara Rao, President, Federation of Telangana Small (MSME) Industries Associations, Industrial Estate, Sanathnagar, Hyderabad – 500 018	145
26	Buddhadeb Shane, GMR Hyderabad International Airport Ltd, GMR Aero Towers, RGIA, Shamshabad, Hyderabad – 500 409	157
27	Deccan Smiths Pvt. Ltd., Plot No.16, Phase-I, I.D.A., Mallapur, Hyderabad – 500 076	162
28	M.K. Gupta, Chief Electrical Distribution Engineer, South Central Railway, IV floor, Rail Nilayam, Secunderabad – 500 071	171
29	M. Kodanda Reddy, Chairman, Telangana Kisan-Kheth Mazdoor Congress, Gandhi Bhavan, Nampally, Hyderabad.	178
30	K.Rangaiah, A.P. State Secretary All India Kisan Mazdoor Sabha (AIKMS), 658, Marx Bhavan, 7th lane, Vidyanagar, Hyderabad 500 044.	200
31	R.V. Rama Mohan, Director, CWS, 12-13-451, Street No.1, Tarnaka, Secunderabad – 500 017	205
32	M. Jagadeeshwar, Managing Director, HMWSSB	206
33	Kommidi Narsimha Reddy, Ex-MLA, Convenor, Praja Chaithanya Vedika, Brahmanpalli (V), Bibinagar (M), Nalgonda District	208
34	K.Santosh Kumar, Flat No.305/98, Singapore Township, Ghatkesar (M), Rangareddy District	
35	G. Gopal Reddy, Advocate, D.No.101, Khana Enclave, Block H-9, Hyderabad – 38	
36	Ranga Reddy, Thoramamidi (V), Bantaram (M), Ranga Reddy District	210

37	Laxma Reddy, Thoramamidi (V), Bantaram (M), Ranga Reddy District
38	Muralidhar Reddy, Kalivemula (V), Sangareddy (M), Medak District
39	B. Narsimha Reddy, Kasala (V), Hathnoora (M), Medak District
40	P. Sadananda Reddy, Shivampeta (V), Vulukal (M), Medak District
41	K.Muralidhar Reddy, 3-1-74/25, Ramshankar Nagar, Ramanthapur, Hyderabad
42	P. Narsimha Reddy, Nandikandi (v), Sadasivpet (M), Ranga Reddy District
43	B. Madhusudhan Reddy, Advocate, H.No.3-9-94, S.V.Residency, Ramanthapur, Hyderabad
44	K. Sai Reddy, 2-1-174/92, Bharatiya Kisan Sangh Office, Nallakunta, Hyd - 44
45	A.Suresh Reddy, 2-1-174/G2, Bharatiya Kisan Sangh Office, Nallakunta, Hyd - 44
46	K.Koteswar Rao, 2-1-174/G2, Bharatiya Kisan Sangh Office, Nallakunta, Hyd - 44
47	M. Ram Prasad, 2-1-174/G2, Bharatiya Kisan Sangh Office, Nallakunta, Hyd - 44
48	M.Sridhar Reddy, 2-1-174/504, Rajput Residency, Nallakunta, Hyd
49	Donuru Ramu, 2-1-174/G2, Bharatiya Kisan Sangh Office, Nallakunta, Hyd - 44
50	Parmadi Anjireddy, 2-1-174/G2, Bharatiya Kisan Sangh Office, Nallakunta, Hyd - 44
51	J.Sri Rangarao, Flat No.503, 2-2-18/18/7, C-29, Near Ahobilam Math, DD Colony, Shivam Road, Hyd
52	Gundeti Chinaa Reddy, Deepalle (V), Naveepeta (M), Mahaboobnagar District
53	B. Ashok Yadav, Devuda Mamidipally (V), Kothur (M), Mahaboobnagar District
54	Sharanappa, Jagithyal (V), Balanagar (M), Mahaboobnagar District
55	Lankaala Prabhakar Reddy, Vishwanathpur (V), Kondurg (M), Mahaboobnagar District
56	Karakala Jagpal Reddy, 11-99/1, Jaganmohan Reddy Compound, Nethaji Nagar, Jadcherla (M), Mahaboobnagar District
57	Palle Srinivas Reddy, Palem (V), Kothakota (M), Mahaboobnagar District

58	K. Krishna Reddy, 11-99/1, Jaganmohan Reddy Compound, Nethaji Nagar, Jadcherla (M), Mahaboobnagar District
59	Mallappa Gattupalli, Polkampalli (V), Parigi (M), Rangareddy District
60	K. Subba Reddy, Subanpur (V), Parigi (M), Rangareddy District
61	Kandada Ambat Reddy, S/o.Raji Reddy, Narayanpur (V), Vikarabad (M), Rangareddy District
62	Kerelli Mallareddy, S/o.Manikya Reddy, Kothagudu (V), Vikarabad (M), Rangareddy District
63	Chandrakanth Chari, Adarshnagar, Near Ganesh Temple, Tandur (M), Rangareddy District
64	Pabbathi Ramachandra Reddy, D.No.2-2-143/6N, Adarshnagar, Tandur (M), Rangareddy District
65	Yasa Narsi Reddy, Thettibayi (V), Voligonda (M), Nalgonda District
66	B. Indra Reddy, Chandana Palli (V), Nalgonda (Mandal & District)
67	D.Danayya, Ex-Sarpanch, Buddharam (V), Nalgonda (Mandal & District)
68	Pisati Satti Reddy, Mermu Gudem (V), Chityal (M), Nalgonda District
69	K. Anantha Reddy, H.No.5-116, Rd.No.6, Adarsh Nagar, Sherlingampally, Hyderabad - 19
70	Bhopal Reddy, Cherlapalli (V), Thipparthi (M), Nalgonda District
71	Manyam Satyanarayana Reddy, Eedula Gudem (V), Miryalaguda (M), Near TV Tower, Nalgonda District
72	Koppula Venkat Reddy, H.No.4-7-527/1, Rd.No.1, DVK Road, Nilagiri Colony, Nalgonda District
73	Nookala Satyanarayana Reddy, TPUS, Ramagiri city, Nalgonda District
74	Kunta Malla Reddy, Endapally Vg, Velagatur (M), Karimnagar (Dt)
75	Gandra Prasad Rao, Rampally (Vg), Golla pally (M), Karimnagar (Dt), Ph.No.9949747991
76	Muduganti Malla reddy, Gopalapuram (Vg), Ramadugu (M), Karimnagar (Dt), Ph.No.90441613722
77	Baddam Laxma Reddy, Venkatraopally (Vg), Ramadugu (M), karimnagar (Dt), Ph.No.9989359345

78	Ashok Reddy(Aadarsha Rythu), Revelli (Vg), Choppadanda (M), Karimnagar (Dt)
79	Papi Reddy, Revelli(Vg), Choppadanda (M), Karimnagar (Dt), Ph.No.9912105304
80	Nimma Narayana Reddy, Narayanapuram(Vg), Ellareddy peta (M), Karimnagar (Dt), Ph.No.9963442381
81	Devayya dyapa, Rajannapet(Vg), Ellareddy peta (M), Karimnagar (Dt), Ph.No.7893816675
82	Ippa Rajender (Ex.Surpanch), Dharmaram(Vg), Mallapur (M), Karimnagar (Dt), Ph.No.9490152929
83	Dabba Ravi, Jagga Sagar (Vg), Metpally (M), Karimnagar (Dt), Ph.No.9908295502
84	Dhonuru Ramu, H.No.2-1-174/G2, Rajputh Residency, Nallakunta, Hyderabad-44. Ph.No.9441901736
85	Malala Rao, Rajeshwara rao pally, Jublinagar (Po), Venkatapur (M), Warangal (Dt).
86	Sambasivareddy, Rajeshwara rao pally, Jublinagar (Po), Venkatapur (M), Warangal (Dt).
87	K.Raghotham Reddy, Jublinagar (Vg), Regunta (M), Warangal (Dt)
88	Kandi Yadava Reddy, Ramanjapur(Vg), Venkatapur (M), Warangal (Dt).
89	M.Srinivasa Reddy, Singirakunta palle (Vg), Narsapur (Po), Malugu (M), Warangal (Dt)
90	Nanjula Apparao, Thimmineni palem (Vg), Khammam (M&Dt)
91	Nageshwara Rao, Lakshmipuram (Vg), Bhodhakal (M), Khammam (Dt)
92	Kilaru Ramakoteshwara Rao, Lakshmipuram (Vg), Bhodhakal (M), Khammam (Dt), Ph.No.9866803668
93	Hanmantha Rao, Chekkara (Vg), Maddur (M), Nizamabad (Dt)
94	Vittal Rao Rtd MEO, Kupriyala (Vg), Sadasiva nagar (M), Nizamabad (Dt)
95	Venkat Reddy, Kupriyala (Vg), Sadasiva nagar (M), Nizamabad (Dt), Ph.No.9440037785
96	Vittal Reddy, Errapahad (Vg), Thadvai (M), Nizamabad (Dt), Ph.No.8106864571
97	S.Rajeswar Reddy, Gumriyyala (Vg), Morkhad(M), Nizamabad (Dt)
98	Ananda Rao, Brahminapally (Vg&Po), Thadvayi (M), Nizamabad (Dt), Ph.No.9492475745

99	Muduganti Sridhar Reddy, H.No.2-1-174&175/504, Rajputh Residency, Nallakunta, Hyderabad-44. Ph.No.9866381090
100	A.Surender Reddy, H.No.2-1-174/G2, Rajputh Residency, Nallakunta, Hyderabad-44. Ph.No.9505518335
101	K.Sai Reddy, H.No.11-1-1815, Maruthinagar, Nizamabad (Dt), Ph.No.9494428698
102	J.Sriranga Rao, Flat No.503, Srilaxmi Salitude, 2-2-18/18/7; C-29, Ahobilam matham daggara, D.D.Colony, Shivam Road, Hyderabad. Ph.No.9246533243
103	M.Ram Prasad, 2-1-174/G2, Nalla kunta, Hyderabad-44. Ph.No.7569456548
104	Goli Gopala Reddy, Advocate, D.No.101; Mona Enclave, Block;H-9, Madhura nagar, Hyd-38. Ph.No.9908604545
105	Parmada Anji Reddy, 2-1-174/G2; Rajputh Residency, Nallakunta, Hyderabad-44. Ph.No.9989334612
106	Surender Reddy, D.No.9-9-296, Ram Nagar, Near TV Station, Karimnagar (Dt)-505009, Ph.No.9440438255
107	Malla Reddy Surpanch, Ramulapally (Vg), Pagidipally (M), Karimnagar (Dt), Ph.No.7702634690
108	Pulakam Aneel, S/o.Sattaiah, Ramulapally (Vg), Pagidipally (M), Karimnagar (Dt).
109	Nallam Mallaiha, S/o. Nallaiha, Ramulapalli (V), Pagidipalli (M), Karimnagar District. Ph.No.
110	Harigopal, Nacharla (V), Pagidipalli (M), Karimnagar District. Ph.No. 9000017256
111	Narender Reddy, H.No. 1-8-492, Balasamudram, Hanumakonda, Warangal District.
112	Srinuvasa Reddy, Baratiya Kisan Sangam, Urukonda (V), Hanumakonda (M), Warangal District.
113	Rangareddy, H.No. 1-8-492, Balasamudram, Hanumakonda, Warangal District. Ph.No. 9573823250
114	Uppendarreddy, H.No. 1-8-492, Balasamudram, Hanumakonda, Warangal District. Ph.No. 9441903006
115	Shanthireddy, (V&M), Regonda, Warangal (District) Ph.No. 7659997086
116	Thirupatireddy, Rtd Teacher, Narmakapalli, Parakala, Warangal District. Ph.No. 9390115530
117	K. Lakshmareddy, H.No. 2-2-470/302, Raghavendhra Residency, Police Head Quarters Venuka, Hanumakonda, Warangal District. Ph.No. 9866063459
118	Lekkala Jalandhar Reddy, Advocate Colony, Road No. 4, Hanumakonda, Warangal District. Ph.No. 9949232255

119	Surender Reddy, Vellampalli (V), Chityala, Warngal (District). Ph.No. 9908295180	
120	Kothuru Raju, Alleti ramaihapalli (V), Chityala, Warngal (District).	
121	Kadukula Ramireddy, Alleti ramaihapalli (V), Chityala, Warngal (District). Ph.No. 9640697091	
122	Kodela Sammaiha, (V&M), Chityala, Warngal (District). Ph.No. 9848986989	
123	P. Rajireddy, H.No. 2-18, Parakala (M), Warangal (District) – 506164. Ph.No. 9440994348	
124	Kottaiha, R.S.S.Off. Mamillagudam, Khammam District. Ph.No. 9951258091	
125	Parmada Anjireddy, No. 2-1-174 & 175/42, Nallakunta Hyderabad. Ph.No. 9491781566	
126	Muruganti Sridhar Reddy, No. 2-1-174/504, Nallakunta, Hyderabad – 044. Ph.No. 9866381090	
127	P. Vydehi, Secretary (I/c), Federation of Telangana and AP chambers of Commerce and Industry, #11-6-841, Federation house, Redhills, Hyderabad,500004	
128	Telanagana Textiles and Spinning Mills Association, Surya Towers, First Floor, Sardar Patel Road, Secunderabad-500003, Telangana State- Phone No.9849028556	230
129	Chief Engineer, Coal & Commercial, APGENCO, Vidyut Soudha, Hyderabad – 500 082	305
130	P.V.Y.N.Somayajulu, General Manager (F&A), The Indian Cements Limited, Vishnupuram, Wadapally (P), Nalgonda District – 508 355	307
131	Munnuru Jayapal Reddy, President, Palmoor R.O. Water Plants Association, H.No.8-3-18/A, Mettu Gadda, Mahabubnagar.	310
132	Indian Nuresrymen Association, No.6-3-1104, Somajiguda, Raj Bhawan Road, Hyderabad – 500 082	311
133	Hyderabad Small Scale Granite Industries Association, 8-3-167/D/72/2, Warlu Mansion, Kalyan Nagar, Hyderabad – 500 038	
134	Gayathri Granite, 2-158/11, Suraram, Hyderabad – 500 055	
135	Vinnakota Enterprises, 2-158/8, Suraram, Hyderabad – 500 055	313

136	Vikrant Garg, Director, Maruti Cottex Ltd.	
137	Dhulipalla V.A.S. Ravi Prasad, Advocate, B2-106, Sy.No.117 Part, Tatti annaram, GSI (SR) Post, Hyderabad – 500 068	
138	N.S.Naidu, Vasant Chemicals Pvt Limited, 1-11-251/1B,4 th Floor, Vasant Towers, Behind Shoppers Stop, Begumpet, Hyderabad	
139	IKP Knowledge Park, genome valley, Turkappally, Shameerpet, RR Dist	
140	Keerthi Industries Limited, Plot No.40,IDA,Balanagar, Hyderabad	
141	Pramukh Packaging Pvt Limited, B-3, IDA, Uppal, Hyderabad	
142	Swastika weld mesh industries, P/6/A, IDA, Nacharam, Hyderabad	
143	Surana Wires Pvt Limited, P/6, IDA, NACHaram, Hyderabad	
144	SPM Wires & Cables Limited, Plot No. A-28/1/12, Road No.15, IDA, NACHaram, Hyderabad	
145	SPM Power & Telecom Pvt Limited, Plot No.A-28/1/12, Road No. 15, I.D.A. Nacharam, Hyderabad	
146	Bontala Chandra Reddy, H.No. 1-1-9/10, RTC X Road, JAwarhar Nagar, Hyderabad	
147	Sarampalli Malla Reddy, H.No. 1-1-60/2, RTC X Road, Musheerabad, Hyderabad	323
148	N.Venugopal Reddy, H.No. 23-6-202, Hanama Konda, Dwaraka Nagar,Warangal	326
149	Addanki Dayakar, Q.No.B-78, Patigadda, Secunderabad, Hyderabad, Mobile No. 9391133779	327
150	Gundlapally Sreenu Mudiraj, H.No. 6-1-177, C-94, Hill colony, Vanasthalipuram, Hyderabad-70	329
151	S.M.S. Rao, Co-head Group Coordinator, Aam Admi Party (Telangana State), Opp.GHMC, Liberty X Road, Hyderabad. Mobile no. 8106798499	330
152	D.Ramu, H.No. 2-1-175, Raj Priya Residency, Nalla Kunta , Hyerabad- Mobile No. 9441901736	331

153	MD. Munawar Chand, H.No.1-4-298, Bholanagar, Musheerabad, Hyderabad	332
154	KRC Reddy, 287, Singareni colony, P.O. Vaishali Nagar, Hyderabad. Mobile No. 8297704816	333
155	General Secretary, Confederation of Welfare Associations, Mehdipatnam, 12-2-823/A/1/2, Santosh Nagar, Opp. Chaitanya Techno School, Mehdipatnam, Hyderabad-500028.	335
156	Chairman, Confederation of Welfare Associations, Mehdipatnam, 12-2-823/A/1/2, Santosh Nagar, Opp. Chaitanya Techno School, Mehdipatnam, Hyderabad-500028.	336
157	Consumer Welfare Council, Patancheru, H.No.16-237, Allwyn Colony, GHMC, Patancheru.	337
158	Dr P.Ramadevi, F.No. 802, Saisagar Height, Patigadda Colony, Begumpet, Hyderabad-Phone No. 9704443030	338
159	Pasya Padma, 1-1-385/12/17/1 Pranav Residency, F.No304, New Bakaram, Gandhi Nagar, Hyderabad-500020	340
160	A.Surendar Reddy, F.No.102, E.C.L. Veera Apartments, C-Block, Prashanti Nagar, Kondapur, Sherlingam Pally. Phone No. 8142724444	342
161	Kaveti Ramulu Flat No. 402, Salim Nagar Colony, Malak Pet, Hyderabad. Phone no. 8886612415	
162	Anji Reddy, President/Bharatiya Kisan Sangh 2-1-174 & 175/G2, Nallakunta Hyderabad, Ph No.9491781566	343
163	M Sreedha Reddy, 2-1-174/504,Nallakunta,Hyd	

S.No	Summary of Objections / Suggestions	Response of the Licensee
1. Swamy Jaganmayananda, Husnabad Village, Kodangal Mandal, Mahaboobnagar District		
1.	The power is supplied as a single phase since 1998. It should have been 3phase supply to the agriculture and single phase supply to the villagers for domestic purpose. The feeders also should have been separated for both the villagers and agriculture. As the supply is on single phase, earthing at transformers is not proper and due to improper earthing the power sometimes passes to the switches. In such circumstances accidents will occur sometimes resulting in fatal accidents.	<p>In TSSPDCL there are 2671 Nos. 11 kV feeders, which are supplying to villages and Agricultural sectors.</p> <p>A suitable AB switch provided to these feeders to provide 3 ph supply to the agricultural sector and 1 ph supply to domestic sector as per requirement.</p> <p>Separation of agricultural feeders from the villages requires huge financial requirement. However separation of agricultural feeders by laying separate lines is under consideration.</p> <p>Proper care is being taken by TSSPDCL for providing effective earthing at 1-ph transformers to avoid accidents during 1-ph supply period</p>
2.	As there are no AB switches in most of the cases, the villagers will try to operate the transformers in the absence of linemen in the case of domestic and as well as Agl DTRs. This results in accidents and in most of the cases the accidents will be fatal.	<p>Almost all DTRs are provided with the suitable AB switches. When ever new transformer is erected, same is being erected along with AB switches.</p> <p>The villagers are advised not to operate the DTRs and are requested to take the services of concerned lines staff to avoid accidents.</p>
3.	The conductor wires laid on the poles of the villages (LT lines) are more than 50years old. The wire often gets broken and wires fall down with power passing through them resulting in loss of power, proving dangerous to human lives and no power in the village till it is repaired and power is restored. In most of the cases the linemen and other power staff are not available in the villages. Hence there is urgent need for replacing the power cables with the new ones.	Even though the electrical lines are laid long back, they will be suitable for the purpose of transmitting the power. However, wherever the conductors are found damaged/undersized, they are being replaced with the required size of conductor.
4.	There is loss of power in the lines due to the following reasons:	a) There will be no loss of power if the distance between the poles is

S.No	Summary of Objections / Suggestions	Response of the Licensee
	<p>a) Distance between the poles if more than 60 feet. b) Trees or branches interfering with the power lines. c) Required no. of DTRs are not supplied due to which these DTRs are burnt due to low voltage. d) Theft of power by unauthorized users. e) Many no. of transformers are unauthorized erected. f) Street lights are not switched off during the day time. g) Adequate staff need to be provided. Eg: there should be one lineman for each panchayat and one AE per section.</p>	<p>more than 60 feet.</p> <p>b) Frequent patrolling of lines is being carried out for trimming of trees.</p> <p>c) Adequate numbers of DTRs are being erected to avoid low voltages.</p> <p>d&e) Suitable action are being taken to curb the theft of energy and erection of unauthorized lines/DTRs.</p> <p>f) Street lights are being maintained by local bodies and will be advised to switch off during day time.</p> <p>g) As per field requirement depending on the work load, the required field staff is deployed.</p>
5.	<p>In order to overcome all the problems and streamline the power supply the following are suggested: The Dept should conduct comprehensive survey of all the electrical installations - Domestic, Commercial, Agl and Industrial - as was done in the case of "Samagra Kutumba Survey conducted by the Telangana Govt". Then you will come to know the facts.</p>	<p>The details of all the consumers are available with TSSPDCL. However, this suggestion will be considered if it is required.</p>
6.	<p>The existing shortage of power estimated at 4-5million units can be reduced or overcome by providing LED bulbs, switching of street lights in the day time, not allowing Agl lines to be used in place of poles by providing the poles to the Agl customers immediately on payment of amount for release of service.</p>	<p>The street lights are being maintained by local bodies, they will be advised accordingly. All Agl pending services are released by givingv all required materiallike poles, conductor, etc.</p>
7.	<p>Declare a Power Day once in a month for each section of the Dept during which the following works should be attended:</p> <p>a) Verification of dues and collection of the same from all the consumers. b) Providing of meters, poles, conductors, DTRs, AB Switches, Burnt meters, Wrong readings, Earthings, etc wherever required. c) Address all the problems of the section on that day in the manner required. If the power day is conducted once in a month the entire state will be covered in two years and most of the problems will be solved, power will be</p>	<p>The activities listed are to be done on continuous basis as per the citizen charter services, like Bill Corrections, Providing Meters, Poles, Conductor, DTR's, AB Switches, Burnt Meters, Wrong readings, earthing etc.,. if we do at once in a month and leave for rest of the month, it will lead to unrest among the consumers. Hence, they all part of Distribution Company Regulations and will be done on regular basis as per SOS.</p>

S.No	Summary of Objections / Suggestions	Response of the Licensee
	saved and revenue to the Dept will be increased. Further, problems of erroneous charging to the consumers will be rectified.	
8.	Make the vigilance administration effective and see that the recommendations of the vigilance are strictly implemented.	All the reports given by vigilance are acted upon and appropriate action taken.
9.	Take strict action on the concerned officials for neglect, delay or other irregularities committed by them and action should be immediate and appropriate.	Any case of neglect, delay or irregularity committed by any employee is taken up with appropriate disciplinary action as per service regulations after conducting due enquiry.
10.	Meters should be supplied to all the people who are now utilizing the power unofficially and their usage has to be regularized. The power utilization for Rural Water Supply and Panchayat Water Supply and village street lights should be properly monitored by engaging additional manpower.	All the people who are utilizing the supply unauthorizedly have being regularized and power supply to RWS, PWS and Street Light are provided meters and will be monitored constantly in coordination with local bodies. Continuous efforts are being made to regularize unauthorized connections.
11.	Power Audit should be taken up in regular intervals. The load of work on Lineman should be reduced and every village should have required no. of transformers and linemen and workers. There must be separate staff for revenue collection for each village or a group of villages depending on no. of connections, domestic, commercial, agriculture and industrial, etc.	Energy audit is carried out every month .Posts at various levels will be sanctioned based on the work load.
12.	Every consumer who submits DDs should be provided with poles and conductors and DTRs as the case may be. Every feeder should be provided with Agl/HVDS immediately. Further every district should be provided with technical SE and old and outdated lines and inter poles should be replaced on warfooting. Every effort will go in vain if the said action is not taken for improvement of the power supply.	Converting of all AGL feeder by HVDS needs huge finances. However the converting of existing 11 kv feeders by HVDS is under process in phased manner. Every district is already having one Superintending Engineer who will be incharge of arranging for erection of inter poles, replacement of damaged poles, etc.,
13.	Some of the Agl general consumers are treated /converted as IT /Tatkal consumers putting them to loss. Such actions need to be avoided.	All the eligible AGL Consumers are being given free supply as per Government Policy. No non-IT payers are brought under paying category. If at all any cases are there they shall be addressed immediately upon receiving such representations as per procedures.
14.	Get the due share of water under the AP Reorganisation Act which is about 1129MW of power which will give a lot of relief to the Dept.	All steps are being taken at different levels to get the due share of telengana state as per AP Reorganisation Act.

S.No	Summary of Objections / Suggestions	Response of the Licensee
2. Venkateswarlu Gadipudi, Dy. GM Legal, AP&T, Vodafone South Limited		
1.	<p>Prayer to the Hon'ble Commission</p> <p>a) To order for the rationalization of tariff for telecom towers in the State.</p> <p>b) To order that the tariffs for consumers with flat load profile and high power factor like telecom towers/CMTE be considered separately.</p> <p>c) To declare that the tariff for telecom tower/CMTE consumers be re-determined as per relevant acts.</p>	<p>As per the definition stated in the Tariff Order 2013-14 for LT-Category III “Industrial purpose shall mean, supply for purpose of manufacturing, processing and/or preserving goods for sale, but shall not include shops, business houses, offices, public buildings, hospitals, hotels, hostels, choultries, restaurants, clubs, theaters, cinemas, bus stations, railway stations and other similar premises, notwithstanding any manufacturing, processing or preserving goods for sale.”</p> <p>As there is no manufacturing, processing and preserving goods activity, Telecom towers are being categorised under LT-II-Non-Domestic/Commercial category.</p> <p>Further to the above it is to inform that LT-II Non Domestic/Commercial category is applicable for</p> <p>a) Consumers who undertake Non Domestic activity.</p> <p>b) Consumers who undertake Commercial activity.</p> <p>c) Consumers who do not fall in any other LT category i.e., LT – I, LT – III to LT –VIII categories.</p> <p>d) Consumers who avail supply of energy for lighting, fans, heating, air conditioning and power appliances in Commercial or Non-Domestic premises such as shops, business houses, offices, public buildings, hospitals, hostels, hotels, choultries, restaurants, clubs, theatres, cinema halls, bus stations, railway stations, timber depots, photo studios, printing presses etc.</p> <p>It means LT-Cat II is not only applicable for commercial activity but also for the activities not related to the other LT categories. As Cell towers business does not fall under any of LT –I,III,IV,V,VI,VII categories, it comes under LT-II category.</p>

S.No	Summary of Objections / Suggestions	Response of the Licensee
	3. M. Venugopala Rao, Senior Journalist & Convener, Centre for Power Studies, H.No.7-1-408 to 413, Flat No.203, Sri Sai Darsan Residency, Balkampet Road, Ameerpet, Hyderabad	
1.	<p>1.TARIFF HIKE CAN BE AVOIDED: TSSPDCL and TSNPDCL have proposed a revenue requirement of Rs.26,474 crores, with a projected revenue from current tariffs of Rs.18,909 crore and a revenue deficit of Rs.7565 crore, for the year 2015-16. We welcome the proposals of the Discoms to continue free power supply to LT agriculture and not to increase tariff for LT domestic consumers with a monthly consumption of less than 100 units and to some other categories of LT V (A) (agriculture with DSM measures), LT V (B) (agriculture without DSM measures) and LT V(C) (salt farming units and rural horticulture nurseries). We also welcome the implied support of subsidy from the State Government to the tune of Rs.6476 crores to bridge the projected revenue gap substantially, though the Discoms have not made it explicit and categorical in their submissions. Though the Discoms have not made it clear how they propose to bridge the projected revenue gap, it can be safely presumed with a sufficient degree of approximation to reality that the Discoms have submitted their much delayed proposals with prior approval of the State Government and as such with an implied commitment from the Government to provide required subsidy to bridge the remaining revenue gap, though the same is not publicly announced either by the Discoms or by the Government. A close perusal of the proposals of the Discoms makes it abundantly clear that the proposed tariff hike to different categories of consumers to the tune of Rs.1089 crore (5.76%) can be avoided by taking prudent decisions. Moreover, if the neo-liberal policies being followed by the Central and State Governments are</p>	<p>As against the revenue requirement of Rs 26,475 crs, the revenue at current tariffs is Rs 18,909 crs resulting in a revenue gap of Rs 7566 crs for FY 2015-16.</p> <p>The discoms have proposed a modest tariff hike of 5.75% which would result in additional revenue of Rs 1089 cr. The discoms have proposed to meet the remaining revenue gap of Rs 6,477 through subsidy from GoTS.</p> <p>The discoms are putting in all efforts for improving the efficiencies. Stringent loss reduction measures have resulted in reduction of losses from 16.94 % in FY 2009-10 to the current level of 13.20% n FY 2013-14</p>

	<p>reversed with rational modifications to protect larger public interest, the existing power tariffs or requirement of subsidy from the Government or both can be reduced.</p>	
2.	<p>3.FINANCIAL RESTRUCTURE PLAN : The Discoms have shown accumulated losses as on 31st March, 2013 of Rs.6455.68 crore for TSSPDCL and Rs.3512 crore for TSNPDCL. Under the financial restructure plan formulated and approved by GoI for the Discoms, the State Government has issued bonds to the extent of Rs.4060.73 crore (around 40% of total losses) - Rs.2316.69 crore for TSSPDCL and Rs.1744.04 crore for TSNPDCL. The Discoms have claimed a balance loss of Rs.4138.99 crore for TSSPDCL and Rs.1767.96 crore for TSNPDCL. They have further explained that the key components of these losses are “unapproved portion of Fuel Surcharge Adjustment (FSA) for the year(s) 2009-10 to 2011-12, (as) the FSA cases are in Courts and Govt. receivable over and above Rs.4553.85 Crs which is agreed by Govt as final settlement.” Against these losses, TSSPDCL and TSNPDCL structured short-term loans to the extent of Rs.1225 crore each. The Discoms have also explained that “as per the terms of the loan, there is a moratorium on principal re-payment for a period of 3 years from 1st April 2014.” They have claimed that the annual interest on these loans for both the Discoms is Rs.282 crore (Rs.141 crore each). The Discoms have maintained that they need to recover the interest cost through tariffs and requested the Commission to allow them to recover the same. The Discoms have also requested the Commission to permit them to recover the cost of servicing interest and principal of these short-term loans as and when principal repayment of loan commences, i.e., from 2017-18. Since the FRP is claimed to be intended to enable the turnaround of the Discoms and ensure their long-term viability, what is the financial support</p>	<p>The Central Government would provide support to FRP through a Transitional Finance Mechanism (TFM) subject to the fulfillment of measures outline in the program me. The TFM has the following features</p> <ol style="list-style-type: none"> 1 Providing liquidity support by way of a grant equal to the value of the additional energy saved by way of accelerated AT & C loss reduction beyond the loss trajectory specified under RAPDRP. 2. Incentive by way of capital reimbursement support of 25% of the principal repayment by the state government on the liability taken over by the state government. <p>The measures outlined as part of FRP schemes are in the areas of</p> <ol style="list-style-type: none"> 1.Tariff setting and revenue realization 2. Release of subsidy 3. Metering measures 4. Audit of accounts 5.Financial performance improvement

	<p>rendered by the Government of India under the programme to the Discoms? The Discoms have stated that the scheme contains measures to be taken by the State Government and State Licensees (Discoms). What are those measures and under what terms and conditions the FRP is approved by the GoI? The details of the scheme as signed by the GoI and the State Government have not been made public. I request the Hon'ble Commission to direct the Discoms to provide me a copy of the FRP.</p>	
3.	<p>The claims of the Discoms for recovery of the principal and interest thereon of these short-term loans during 2015-16 and/or thereafter from consumers through true-up or tariff as also FSA amounts from 2009-10 to 2011-12 are not permissible for the following reasons, among others:</p> <p>a) At the behest of the State Government of the undivided Andhra Pradesh, the four Discoms had purchased additional power by obtaining loans from Banks and financial institutions under the condition that the Government would redeem both the principal of the loans and interest thereon from 2008-09 onwards. No approval of APERC was sought or obtained for the quantum, period and ceiling price for purchasing that short-term power by the Discoms. As such, the Discoms are entitled to recover that amount from the State Government after deducting the revenue obtained by them on sale of that additional power to non-agricultural consumers and fully to the extent they supplied power under free supply to agriculture. If such expenditure was permissible under FSA, the Discoms should have or would have claimed the same accordingly. That the Discoms did</p>	<p>a) The commitments of GoAP towards its dues is finally settled at Rs 8600 crs up to FY 2012-13 the cutoff date for the implementation FRP scheme. GoAP had made a final settlement of its commitments to DISCOMS and agreed to take over the liabilities to the extent of Rs 8600 Crs and share of TS DISCOMs is Rs 4553.85 Crs.</p> <p>Once again it is reiterated that, the commitment of Govt is taken care by agreeing to take over bonds. The DISCOMs are only pleading before the Hon'ble Commission to cover the interest portion on the restructured loans which are due to unable to collect FSA. Further had DISCOMs were in position to collect FSA, it has repaid to the STL and there would not have been any commitment to consumers. In view of the forging facts DISCOMs can only have option to cover the</p>

<p>not do so confirms that they are not entitled to recover that amount and interest thereon from consumers.</p> <p>b) To serve political expediency of the then ruling party, at the behest of the Government, especially during pre-election periods, with a view to hoodwinking the consumers that there were no tariff hikes or additional burdens, the Discoms delayed filing of their FSA claims for almost three years without any valid reason and justification. Some of the consumers, especially industrial consumers, challenged the much-delayed claims of the Discoms for FSA and orders given thereon by APERC and obtained stay orders. The recovery or otherwise of those FSA claims would depend on the kind of final orders that would be given by the Supreme Court. Claiming and permitting recovery of such FSA amounts from consumers, when stay orders are in force, would tantamount to contempt of court.</p> <p>c) Though the then APERC directed the Discoms to resubmit their ARR and tariff proposals in view of bifurcation of the State with updated details, the Discoms did not do so. As such, for their failure of omission, the Discoms should not be permitted to recover carrying cost of Rs.132 crore for the year 2014-15 from the consumers.</p> <p>d) Additional power purchases on short-term basis, without obtaining consent of the Hon'ble Commission on the quantum, period and ceiling price of power, would tantamount to bypassing the regulatory process of the</p>	<p>interest under the ARR.</p> <p>It is presumed that, the Tariff Order of FY 13-14 is also applicable to FY 2014-15. The Hon'ble ERC approved market purchases to the extent of 10094 MU at ceiling price of Rs 6 per Kwh .The Discom can procure power from the market or inter change the procurement in case of shortages. The Hon'ble ERC also allowed dispatches by use of RLNG to the extent of 2431 mu at Rs 8.97 per unit. The Hon'ble ERC has fixed the ceiling price in case of shortage of supply as per section 62 1(a) of Electricity Ac 2003, the DISCOMs can procure power for period not exceeding one year to ensure reasonable prices of Electricity .</p> <p>Considering the cash flow of DISCOMs it is inevitable for the DISCOMs to recover the debt servicing cost from ARR in view of unable to collect the FSA. Had there been no case pending in courts to collect FSA DISCOMs would have collected and repaid STL. The learned Objector is well aware of the fact that the revenues of DISCOMs are limited and all the expenses are to be matched with suitable revenues in ARR. The debt servicing cost if not covered ARR then the DISCOMs has to defer the generator liability to serve the debt cost. The rebate benefit of 2% to 2.5% on each bills have to be forgone. Further loans have to be drawn to meet the debt servicing cost</p>
--	--

	<p>Commission. Without such regulatory process and reasonable limits on quantum and maximum price of additional power to be purchased, short-term purchases of power at higher costs, though apparently for serving consumer needs, actually would lead to imposition of unjustifiable and avoidable burdens on consumers. As such, I request the Hon'ble Commission to examine whether costs of additional power purchases made by the Discoms during 2014-15 are permissible to be recovered from consumers fully or partly or not.</p> <p>e) For the failures of commission and omission on the part of the State Government and/or the Discoms, the consumers of power should not be penalized. Therefore, I request the Hon'ble Commission not to permit claims of the Discoms for true up of the above-explained short-term loans and interest thereon, carrying cost for 2014-15 and the FSA amounts.</p>	
4.	<p>4. CONFLICTING CLAIMS OF TS DISCOMS AND AP DISCOMS ON THEIR RESPECTIVE SHARES IN POWER PROJECTS : Projections on availability of power and their shares therein as incorporated in their ARR submissions to TSERC by TS Discoms and to APERC by AP Discoms for the year 2015-16 contain mutually conflicting claims.</p> <p>In the A.P. Reorganization Act, 2014, it is incorporated : "1.Units of APGENCO shall be divided based on geographical location of power plants.</p> <p>"2. Existing Power Purchase Agreements (PPAs) with respective</p>	<ul style="list-style-type: none"> • In accordance with the Clause C(2) of schedule XII of the AP Reorganization Act and as per G.O.Ms.No.20, dt:08.05.2014, the allocation of power generated from the existing and the ongoing power plants located in both the states should be in the ratio of 53.89% & 46.11% respectively for Telangana and Andhra Pradesh. • Government of Telangana on behalf of TSDISCOMs have already submitted its views on the sharing of the power from both the Central Generating Stations, inter state hydel generating stations, IPPs, NCEs and as well as the State owned Power Generating stations located in AP & Telangana states, before the Committee constituted by MoP, Govt of India, under the chairmanship of Chairperson/CEA, to resolve the issues cropped up post state

<p>DISCOMS shall continue for both on-going projects and projects under construction.</p> <p>“6. The power of the Central Generating Stations will be allotted in such ratio to the State of Telangana and the State of Andhra Pradesh based on the actual energy consumption of the last 6 years of the relevant DISCOMS in the respective successor State.</p> <p>“7.For a period of ten years, the successor State that has a deficit of electricity shall have the first right of refusal for the purchase of surplus power from the other successor State.</p> <p>“8. The districts of Anantapur and Kurnool which fall within the jurisdiction of the AP Central Power Distribution Company Ltd will now be reassigned to the AP South Power Distribution Company Ltd.”</p> <p>Telangana State Discoms TSSPDCL and TSNPDCL have projected their share in NCE units as per geographical location and as per the PPAs entered with erstwhile APCPDCL. In the ARR for 2015-16 submitted to TSERC, they have considered a share of 52.12% in CGS as per recommendations of a committee headed by the chairperson of the CEA appointed by the GoI. Telangana Discoms have claimed a share of 41.68% as per population ratio in Tungabhadra/Machkund Hydrel Stations as per A.P. Reorganization Act. In all other sources, including thermal and Hydrel stations of AP Genco and TS Genco and Hinduja, TS Discoms have claimed a share of 53.89% for themselves.</p> <p>AP Discoms have considered energy availability for upcoming</p>	<p>bifurcation between the TSDISCOMS and APDISCOMS. Decision of the Committee is awaited.</p>
---	---

<p>APGENCO and TSGENCO thermal stations - KTHPP Stage II, DSTPP stage I & II - and hydel stations as per their geographical location. They have allocated NCE units to Discoms on geographical consideration. Allocation percentage for all other existing APGENCO thermal stations, CGS stations and gas-based IPPs is considered as 46.11% for AP Discoms out of the share of undivided AP (based on the last five years' average consumption of Anantapur and Kurnool districts which were transferred from the erstwhile CPDCL (now TSSPDCL) to APSPDCL as part and parcel of the process of bifurcation of the erstwhile Andhra Pradesh). AP Discoms have claimed the entire installed capacity of HNPCL for themselves.</p> <p>While AP Discoms have considered PLF of 75% for thermal stations of AP Genco, TS Genco and CGS, TS Discoms have considered average PLF of 80% for thermal stations of TS Genco and AP Genco. Similarly, while AP Discoms have considered availability of natural gas for four old IPPs at 41% PLF, TS Discoms have considered it as 30% PLF.</p>	
<p>These conflicting claims on allocation of respective shares in power by AP Discoms and TS Discoms would lead to litigations, with variations in their respective projections on availability of energy. These conflicts are arising mainly as a result of divergent interpretations being given to some of the provisions in the A.P. Reorganization Act by the Governments of Telangana and Andhra Pradesh. Obviously, the legality or otherwise of these conflicting claims and interpretations cannot be settled by TSERC and/or APERC. Both the Commissions can at best take on record and</p>	<ul style="list-style-type: none"> • In accordance with the Clause C(2) of schedule XII of the AP Reorganization Act and as per G.O.Ms.No.20, dt:08.05.2014, the allocation of power generated from the existing and the ongoing power plants located in both the states should be in the ratio of 53.89% & 46.11% respectively for Telangana and Andhra Pradesh. • Government of Telangana on behalf of TSDISCOMs have already submitted its views on the sharing of the power from both the Central Generating Stations, interstate hydel generating stations, IPPs, NCEs and as well as the State owned Power Generating

consider availability of energy as projected by the respective Discoms, but actually cannot ensure such availability. Both the States are making conflicting claims on the legality or otherwise of PPAs pertaining to some of the projects in the erstwhile A.P. As these claims pertain to by now inter-State projects, they fall within the jurisdiction of CERC. If Discoms of both the States resort to legal litigations, they have to approach CERC, thereafter Appellate Tribunal for Electricity and finally the Supreme Court. Such litigations would take their own course.

There is scope for resolving these disputes harmoniously and equitably to the advantage of both the States. There are several incongruities in the A.P. Reorganization Act. Nobody could provide any justification to allocation of 53.89% to Telangana, which has 10 districts and a population and geographical area of about 42%, and 44.11% to Andhra Pradesh, which has 13 districts and a population and geographical area of about 58%, in the installed capacities of power projects available to the undivided Andhra Pradesh. While AP Discoms projected a requirement of 58,191 MU for 2015-16, Telangana Discoms have projected a requirement of 52,100 MU. Even after considering the element of inflated demand, there is no basis to justify the above ratio of 44.11:53.89 between the two States. Average consumption of power in respective areas also does not provide any rational basis for distribution of power between the two States. It is an established fact that in the undivided Andhra Pradesh undue importance was given to Hyderabad and Ranga Reddy districts with no or short-duration power cuts and other areas have been discriminated against with long-duration power cuts. As such, taking consumption as basis

stations located in AP & Telangana states, before the Committee constituted by MoP, Govt of India, under the chairmanship of Chairperson/CEA, to resolve the issues cropped up post state bifurcation between the TSDISCOMs and APDISCOMs. Decision of the Committee is awaited.

for distribution of power between both the States would give a distorted and inequitable pattern. Allocation of power to both the States on the basis of population, as is done in the case of allocation of assets in other areas, would affect interests of Telangana. Actually, we have been requesting the erstwhile APERC over the years to direct the four Discoms in the undivided A.P. to ensure supply and power cuts proportionate to demand of respective areas/districts to be fair and equitable. Similarly, allocation of power from existing and on-going projects which were supplying or intended to be supplying power to the four Discoms in the undivided A.P. between Andhra Pradesh and Telangana States on the basis of average demand of respective areas for a period of five or six years before bifurcation of the erstwhile A.P. would ensure equitable distribution between them. Secondly, projects of erstwhile AP Genco can be allocated to Gencos of both the States on geographical basis. Based on the respective ratios of both the States based on the equitable principle of demand-based distribution, whatever deficit Telangana State faces can be made good by required additional allocation from the Central Generating Stations by the GoI or from the share of undivided A.P. in the CGS. Apart from ensuring equity, such an allocation has added advantages to both the States. They can avoid payment of wheeling charges to PGCIL and charges to SRLDC for mutual transmission of power after accounting adjustment which they have to otherwise pay in the event of both the States continuing to have shares in the power projects of both the Gencos. Each State can decide annual overhauling of their respective projects based on their requirements and there will be no scope for disputes on such issues. Regarding

	<p>projects of Gencos of respective States, they will continue to be State specific projects, not inter-State projects, and as such on issues relating to them they need not approach CERC in New Delhi; they can approach their respective State ERC. Above all, the dispute on legal tenability or otherwise of PPAs will be resolved between the two States. In fact, through the media, I have been advocating resolution of these disputes between Andhra Pradesh and Telangana on these lines for almost one year. Even the erstwhile APERC, under the chairmanship of Dr V Bhaskar garu, in its advisory No.3, recommended distribution of power between A.P. and Telangana broadly on these lines and sent the same to the GoI and Governments of Telangana and Andhra Pradesh. Unfortunately, no move has come either from the GoI or the State Governments in that direction so far to resolve the avoidable disputes. I request the Hon'ble Commission to recommend to the Central and State Governments to resolve the disputes on these lines or in any other better way which it deems fit. What do the Government of Telangana and TS Discoms propose to do to resolve these disputes and get their due share of power?</p>	
5.	<p>5.AVAILABILITY OF POWER AND SHORT-TERM PURCHASES : For the year 2015-16, against a total requirement, including peak requirement, of 52,100 MU (14,476 MU for TSNPDCL and 37,624 MU for TSSPDCL) projected availability is 60,250 MU with a surplus of 8150 MU which works out to 15.64 per cent. For 2015-16, TSSPDCL has projected annual growth rate in sales of power of 13.16% over sales of 2014-15, while TSNPDCL has projected a growth rate of 9.80%. These projected growth rates being substantial, obviously, that much reserve margin is on the higher</p>	<p>TSDISCOMS have contracted short term power through a transparent competitive bidding process. TSDISCOMS have contracted short term power so that there is no energy deficit in FY 15-16 and also in view of disputes in not scheduling of legitimate share of power to telangana discoms . Considering that currently all short term power is being consumed, it is expected that complete contracted short term power would be used at least till power starts flowing from all upcoming long term sources. In case of any surplus, TSDISCOMS would make an earnest effort to sell the surplus power to other states facing deficit</p>

side and may not be required. In this connection, I request the Hon'ble Commission to consider the following points, among others:

a) The Discoms have maintained that “the estimated purchases from such external sources (short-term purchases) are estimated to be 9123 MU for FY 14-15 and 2249 MU for FY 15-16.” They have further maintained that “based on the information available with the licensees on “the possible market prices for such purchases” - Rs.6 per unit for bilateral purchases and Rs.5.50 per unit for power from NTPC’s Jhajjar for 2015-16. (para 4.4.8) At another place in ARR (para 4.3.8), the Discoms have explained that bilateral/short-term purchases of 800 MU per month for April and May, 2015 (900 MU at para 4.2.9) and 525 MU per month from June 2015 and March 2016 have been considered. There does not seem to be any prudent propriety or legal tenability and respect for applicable regulatory process of the Commission on the part of the GoTS in making the Discoms enter into contracts for purchases of short-term power, even without seeking consent of the APERC that has been in existence with due authority in the undivided Andhra Pradesh and after bifurcation of the State till the present TSERC is formed for the quantum, period and ceiling price per unit for purchasing short-term power. What kind of bidding process the Discoms have adopted for short-term purchases? What are the terms and conditions under which TS Discoms have entered into or going to enter into contracts for short-term power purchases? The Discoms have maintained that “whenever the said power is not supplied as per the agreement, the power trader is liable to payment compensation.” Is there any condition incorporated in the

	<p>contract to the effect that the sellers or Discoms have to pay 20% of cost per unit in the event of failure to supply or failure to purchase power, as the case may be? If so, what do the Discoms propose to do with purchase or non-purchase of projected surplus power, if it cannot be used or re-sold?</p>	
	<p>b) Under long-term power purchase agreement (PPA) signed with Thermal Power Tech Corporation India Limited (TPCIL) by the Discoms of Andhra Pradesh and Telangana for supply of 500 MW for a period of 25 years, TS Discoms have been allocated a share of 53.89%, i.e., 269.54MW, under G.O.Ms.No.20. As per terms of PPA, TPCIL has to commence supply of power from the 1st April, 2017 to the Discoms. However, the Company has requested the Discoms to prepone commencement of supply of power to them to 1st April, 2015 in view of early commissioning of the units of their project. TS Discoms have considered availability of 2011.82 MU from this plant during 2015-16 with an estimated variable cost of Rs.1.82 per Kwh and fixed cost of Rs.352 crore. (However, AP Discoms have considered variable cost of Rs.1.76 per unit and fixed cost of Rs.313.29 crores is for 2015-16.) Why have the TS Discoms considered higher costs? What is the total cost per unit? I request the Hon'ble Commission to examine whether agreeing to preponement of commencement of supply of power to 1st April, 2015 by this project is desirable and beneficial, especially in view of binding contractual obligations on the Discoms to purchase surplus short-term power or pay</p>	<p>Variable cost per unit and fixed cost have been considered for FY 2015-16 based on the tariff quoted by the bidder while participating in Case-I Long Term tender</p>

	<p>penalty, if any, for non-purchase.</p> <p>c) purchases of power and surplus (reserve margin) should be restricted to prudent level by the Commission.</p>	
6.	<p>6. SCOPE FOR AVAILABILITY OF ADDITIONAL POWER NOT CONSIDERED : Against allocation of 53.89% share (538 MW out of 999 MW) to TS Discoms from the four gas-based private power projects of GVK, Spectrum, Lanco Kondapalli and Reliance BSES, only 1482 MU is considered for 2015-16 with an average PLF of 30% only (AP Discoms have considered average PLF of 41%) due to shortage in supply of allocated natural gas. Energy availability is not considered from GVK Extension, Vemagiri, Gautami and Konaseema (total 1499 MW with a share of 53.89% for TS Discoms), as there has been no supply of natural gas from Reliance Industries Limited from KG D6 fields to these projects from 1.3.2013 onwards. The Discoms have not considered scope for availability of additional power from the existing power projects. Nor does the efforts, if any, made by the GoTS seem to be yielding desired results to ensure optimum generation and supply of power exceeding the projected quantum from the existing and upcoming projects for 2015-16. I request the Hon'ble Commission to consider the following points :</p> <p>a) The Government of India has reportedly agreed to divert 2.4 MMBTU of natural gas from the supplies being made to fertilizer plants to enable generation of additional 450 MW from the gas-based projects in A.P. which supply power under PPAs to the Discoms of Telangana and A.P..</p>	<p>(a)</p> <ul style="list-style-type: none"> • The natural gas supplies from RIL KG D6 fields to the New IPPs viz., 220 MW GVK Extn, 370 MW GMR Vemagiri, 464 MW GVK Gautami and 444.08 MW Konaseema became zero from 01.03.2013 onwards. Hence there is no generation. • To tackle the prevailing shortage of Natural gas for the aforesaid new IPPs, TSPCC is making arrangements towards additional generation with RLNG by the way of swapping with KG D6 Gas. • TSPCC appraised to the Government of India about the power deficit that is being faced by Telangana State and requested for allotment of 5 MMSCMD RLNG(under swapping arrangement with KG D-6 Gas) for additional Generation of 1000 MW. The Government of India & Ministry of Fertilizers accepted to swap 2.4 MMSCMD of gas with RLNG, which will generate 450 MW approximately out of which TSDISCOMs share will be around 240 MW. Swapping arrangement is yet to be commenced. <p>c) Regarding the expiry of PPA's of IPPs i.e. M/s. GVK-I, M/s. SPGL & M/s. LANCO, TSDISCOMs examined the merits and demerits of PPA renewal or Buy-out of the Projects and as per the provisions of the PPA, TSPCC took a decision to go for Buy-out duly appointing IFCI (a Govt. of India enterprise) as an Appraiser for determination of Buy-out price of the Power plants. The above process is under progress. After the evaluation i.e. determination of Buy-out price the same will be put before Honble Commission for its approval.</p>

From this, TS Discoms can get their share of 242 MW.

- b) If the GoTS insists on the Government of India to ensure supply of natural gas and indigenous coal at least as per allocations made to power projects, which supply power to Telangana and A.P., and succeeds in that direction, substantial additional power will be available from the existing and upcoming power plants. In such an eventuality, TS Discoms can get an additional power of not less than 50 MU per day by making use of idle capacity of existing and upcoming projects.
- c) The Discoms have informed that GVK phase I PPA is expiring in June 2015 and Lanco Kondapalli stage I PPA is expiring in December 2015 (A.P. Discoms informed the expiry of the PPA of the latter project is 17.10.2015.) Going by the projections of availability of power from GVK and Lanco plants for 2015-16 of 126.86 MU and 536.17 MU respectively, it is obvious that the TS Discoms have considered availability of power from these two plants only the respective dates of expiry of their PPAs and availability of natural gas for 2015-16. Responding to one of my queries pertaining to ARR and tariff proposals for the year 2014-15, the Discoms had replied in January 2014: “Regarding the buy-out (or) otherwise of Projects of GVK (stage I) & SPGL Power Plants, APDISCOMS have initiated steps in accordance with the procedure stipulated in the respective PPAs and would evaluate the benefits of the Options (examining the R&M proposals of IPPs and PPA

	<p>Renewal (or) Buy-out of the Project) provided in the aforesaid agreements and submit the same to this Hon'ble Commission, for its Scrutiny and directions. This process would take time." Have the TS Discoms evaluated the benefits of these three options and submitted the same to the Hon'ble Commission, indicating their preference for any option and seeking the Commission's consent? I request the Hon'ble Commission to hold public hearing on these options, if proposals on the same are already submitted to it by the Discoms. Having paid unreasonably higher fixed costs and other charges to the gas-based IPPs during the period of their PPAs in view of highly questionable and manipulative terms and conditions therein and the failures of the Discoms to get them amended rationally, the consumers of power are entitled to get the benefit of frontloading the tariff by continuing to get power from these projects in the most beneficial manner by the Discoms opting for the option to which ensures maximum benefit to the consumers after expiry of the term of PPAs. I request the Hon'ble Commission to issue necessary directive to the Discoms in this regard and take necessary action in time to protect larger consumer interest.</p>	
7.	<p>7. SCOPE FOR REDUCING INFLATED POWER PURCHASE COST, ARR AND REVENUE GAP & AVOIDABLE LEGAL LITIGATIONS: There is scope for reducing power purchase cost projected by the Discoms. I request the Hon'ble Commission to consider the</p>	<p>It is to be noted all thermal stations run predominantly on thermal coal supplied from domestic sources like MCL, SCCL etc. while imported coal is been used only in case of domestic coal shortfall. With increase in rail freight rates for coal by 6.3% and increase in green cess to Rs. 200 per metric tonne, the cost of coal is expected to</p>

	<p>following points, among others:</p> <p>a) 2% ESCALATION OF VARIABLE COSTS FOR THERMAL PROJECTS SHOULD NOT BE PERMITTED : The Discoms have factored 2% escalation in variable costs of thermal stations of TSGENCO and AP Genco and Central Generating Stations for the year 2015-16 over the variable costs for the first six months of 2014-15. It is generally known that cost of imported coal is coming down, and more usage of imported coal is likely in upcoming years, besides decreasing prices of crude oil and diesel, which may decrease the secondary oil cost and keep transportation cost on low side. Therefore, this 2% escalation is hypothetical and should not be permitted by the Commission. In any case, options are always open to the Discoms to seek true-up of difference in power purchase cost for 2015-16 in the ARR to be proposed for 2016-17. How much would be the proposed 2% escalation in variable costs?</p>	<p>increase significantly which would increase the variable cost of production Still, TSDISCOMS have taken a conservative estimate and projected the increase in variable cost only by 2%</p>
	<p>b) ENSURE INTERNATIONAL COMPETITIVE BIDDING FOR PURCHASING IMPORTED COAL : I would like to bring to the notice of the Hon'ble Commission what I had submitted on the ARR proposals of the Discoms for 2014-15 regarding contrived bidding and higher costs for imported coal with a request to consider the same: "As a result of the failure of GoI in ensuring timely supply of at least allocated domestic coal, Thermal projects of AP Genco and Central generating</p>	<p>b) Procuring coal through competitive bidding is not under the purview of TSDISCOMS c) TSDISCOMS have a MoU with Hinduja power. PPA is expected to be signed soon. Based on this consideration, TSDISCOMS have considered energy availability from HNPCL</p>

<p>stations have already been forced to buy costly imported coal. There are serious allegations that manipulations and corruption are taking place in purchasing imported coal by confining competitive bidding to a few marketing companies of the Central government. Instead of re-examining the issue and ensuring international competitive bidding to enable foreign producers of coal to participate in the process to ensure real competitive bidding and economic price for imported coal, the Discoms proposed to add 10% escalation over actual variable costs of first half year of 2013-14 of AP Genco and Central generating stations for the next financial year. However, the Commission did not allow the escalation, as suggested by some of us. We request the Commission to take the same stand for the year 2014-15 also, besides disallowing the claim of the Discoms for true up of variable costs of thermal projects of AP Genco and NTPC exceeding the ones permitted by the Commission for the year 2013-14 in view of their failure to ensure that coal is imported by adopting international competitive bidding to enable actual producers to participate in the bidding. Otherwise, the decision of the Commission to disallow 10 per cent escalation in the variable cost of coal-based thermal projects will have no value. Responding to our submissions during the earlier public hearings on FSA claims on the need for providing relevant information pertaining to the</p>	<p>MoA was entered on 17-05-2013 by the erstwhile APDISCOMs with M/s HNPCL for entering amendments to the existing PPA in line with the Regulations and EA2003. As per the MoA , the Draft amendments are prepared by the both parties and discussed during the meetings with M/s HNPCL. The proposed amendments are sent to M/s HNPCL for their comments. After finalization of the draft amendments, same will be submitted to the Hon ERC for approval.</p>
--	--

<p>procedure adopted for importing coal through competitive bidding and examining the same, the Commission had simply stated that “the role of Commission is limited to verifying whether the coal imported by APGENCO is procured through competitive bidding or not as the cost of it is levied on the consumers” (para 36 and page 42 of FSA order of the Commission for the 2nd quarter of 2011-12). The Commission has failed to see that the relevant information pertaining to the procedure adopted by AP Genco for importing coal through competitive bidding is provided to us. Nor did it respond positively to our request to arrange to permit interested objectors to peruse the relevant files in its office in the presence of the officers concerned. The above response of the Commission simply says what its role is but has not made it clear whether it has played its role in its true spirit and examined what kind of competitive bidding is followed for importing coal and whether it is satisfied that that is the only procedure that can be adopted and that no other better procedure can be adopted, based on the actual market conditions prevailing, to explore the possibility for importing coal at prices cheaper than what AP Genco and NTPC are paying, especially in view of the fact that “the cost of it is levied on the consumers”. Did the Commission examine whether AP Genco and NTPC followed international competitive bidding to ensure participation of</p>	<p>The Coal linkages for the Power stations generally will be allocated by standing linkage committee long term (SLCLT), Ministry of Coal , GoI. The existing power stations (KTPS,KTPP and RTS-B) of TSGENCO are linked to SCCL as per the linkage approved by GoI. The new project proposed by TSGenco are designed to utilize both indigenous coal and</p>
---	---

<p>producers of coal, since coal is being imported from other countries, or simply confined the bidding to a few selective companies or traders who are not producers of coal but middlemen trading in coal? Despite brining the fact that coal is being imported at avoidable higher cost through contrived bidding process and that NTPC is paying much higher cost than the price being paid by AP Genco for importing the same quality of coal, the Commission, by not examining all these relevant aspects, is shirking its responsibility of protecting larger consumer interest, with such a casual approach. In view of change of guard in the Commission, I once again request the Commission to re-examine the issue and take appropriate decisions as requested above.” It is reported that TS Genco intends to import coal for its projects. It was also reported earlier that Hon’ble Chief Minister of Telangana Sri K Chandrasekhar Rao garu had directed TS Genco to get boilers of new projects designed to use imported coal, claiming that indigenous coal was not available, contrary to his repeated claims before elections that coal from Singareni Collieries Company Limited would be available for setting up thermal projects to the tune of 10,000 MW in Telangana.</p> <p>c) FIXED COST AND PPA OF HNPCL: Claiming availability of 53.89% share from the Hinduja project (two units of 520 MW each) to Telangana State, with energy availability of 3449 MU for 2015-16, the</p>	<p>imported coal.</p> <p>The Variable Cost of Simhadri STPS is considerably high when compared to the Variable Cost of HNPCL as 40 % of required Coal is being imported for the Simhadri STPS.</p> <p>The NTPC is using 60 % of indigenous Coal and 40% of imported Coal for the Simhadri Super Thermal Power Station in view of the shortage of indigenous Coal.</p>
---	---

<p>Discoms have maintained that “indicative fixed cost for KTPP II, Krishnapatnam and Hinduja have been considered.” For two units of Krishnapatnam, the Discoms have considered fixed cost of Rs.1162 crore and a variable cost of Rs.2.48 per unit and for Hinduja fixed cost of Rs.638 crore (AP Discoms have considered fixed cost of Rs.1028 crore) and variable cost of Rs.2.29 per kwh. Whereas “fixed costs have been considered as projected by the appropriate generating stations”, the Discoms have claimed. What are the fixed costs actually projected by Hinduja and AP Genco’s Krishnapatnam and TS Genco’s KTPP II projects? The Discoms have informed that HNPCL has submitted tariff proposals for its plant under cost plus basis before APERC for approval and that the same is pending. Have the Discoms signed final PPA with HNPCL and submitted the same to appropriate ERC for its approval? In their responses to my queries on ARR and tariff proposals for 2014-15, the Discoms had replied that they and HNPCL were likely to sign the PPA on 31.3.2014. In their ARR proposals for 2014-15, the Discoms informed that “the licensees have considered the fixed and variable costs for upcoming HNPCL power plant to be same as the costs for NPTC Simhadri Stage II. However, actual tariff would be subject to approval of Hon’ble Commission.” In this connection, I would like to reiterate what I had submitted on this issue relating to ARR and tariff</p>	<p>The HNPCL has yet to start generation and Variable Cost arrived by HNPCL is based on 100 % of indigenous Coal</p>
--	--

proposals of the Discoms for 2014-15: “The Discoms have shown the cost of power from NTPC Simhadri stage II as Rs.3.74 per unit. The State Government has directed the Discoms to enter into a ‘continuation agreement to the PPA of 1998 with M/s HNPCL’, they had explained earlier. When the so-called continuation agreement is still pending and the Commission’s consent to the same is to be sought, and when the Discoms have not explained whether HNPCL has agreed to the tariff on par with that of NTPC’s Simhadri stage II, what is the sanctity or legality in the Discoms proposing to purchase power from HNPCL at the presumed or speculative rate? If the Commission permits the Discoms to purchase power from HNPCL accordingly, without holding public hearing on PPA, if signed between the Discoms and the project, and giving consent to the same, it may lead to bungling and legal litigation later.” If the Discoms and HNPCL have not signed PPA so far, what are the reasons for the same?

d) RECOVERY OF RS.2081.81 CRORE FROM APGENCO: In its order dated 31.5.2014 in O.P.No.15 of 2009 and IA Nos.3 of 2010, 9 of 2011, 21 of 2013 and 36 of 2013 in OP No.15 of 2009, APERC directed APGENCO to adjust a difference of Rs.2081.81 crore between the tariff already collected from Discoms and the tariff approved for specified years and projects mentioned therein before 31.12.2014. Was that amount adjusted

AP Genco claimed fixed cost as per actual availability for old stations and based on actual COD for new stations. The amounts were adjusted on year to year basis and final adjustment was made during 2012-13 as part of FRP scheme. Hence all the recoveries were made as per APERC Order No. 15/2009.

	<p>by APGENCO, as directed by the Commission? If not, what steps are the Discoms taking to recover the same from TSGENCO (and APGENCO)? Since no mention is made of adjustment of that huge amount in the form of true-down by the Discoms in their ARR for 2015-16, I request the Hon'ble Commission to deduct that amount from annual revenue requirement, including claims of true-up, projected by the Discoms (proportionately for TS Discoms) with a direction to them to recover the same from TSGENCO (and APGENCO), if not already adjusted or recovered.</p>	
	<p>e) QUESTIONABLE REVISED ESTIMATES OF AGRICULTURAL CONSUMPTION : It has become a standard practice for the Discoms to project inflated agricultural demand and for the Commission to reduce the same and for the Discoms to show revised estimates of higher consumption for agriculture. Genuine criticism is being voiced every year that a part of transmission and distribution losses is being included in agricultural consumption. Even while showing overall sales below the levels permitted by the Commission, both the Discoms have shown agricultural consumption exceeding the levels permitted by the Commission by 406 MU for TSNPDCL and an increase for 2014-15 to 37.28% from 32.87% in 2013-14; and by 1116.57 MU for TSSPDCL for the year 2013-14 and an increase for 2014-15 to 22.98% from 20.95% in 2013-14. Since the scheme of free</p>	<p>Agricultural consumption is arrived based on effective implementation of ISI suggested new Methodology in TSSPDCL. Distribution losses are arrived based on recorded metered sales of both LT and HT services as per Energy Billing System, HT services data base and assessed Agl. Consumption as per ISI suggested new Methodology. It is not correct that a part of transmission and distribution losses is being included in agricultural consumption.</p> <p>The Year wise agricultural consumption of TSSPDCL from FY 2012-13 to FY 2014-15(up to Jan'15) are shown below :</p>

supply of power to agriculture is being implemented and Government is providing subsidy, in addition to cross subsidy, the Commission should not permit true-up of expenditure for revised excess consumption for agriculture and the same should be provided as additional subsidy by the Government. Since the Government has agreed to provide substantial subsidy for 2015-16, it can be presumed that the same covers expenditure for revised excess consumption for agriculture.

Sl · No.	Year		Input in MU	Mete red Sales in MU	% of meter ed sales w.r.t input	Agl Cons umpt ion in MU	% of Agl Cons umpt ion w.r.t input	Differ ence in Agl. consu mptio n w.r.t. previo us year in MU
1	2012 -13	Actuals	28736 .62	1865 2.14	64.91	6229. 27	21.6 8	
2	2013 -14	Actuals	29644 .47	1938 4.28	65.39	6553. 95	22.1 1	324.6 8
3	2014 -15	Actuals (up to Jan'15)	26642 .78	1805 4.84	67.77	5666. 47	21.2 7	
4	2014 -15	Projecte d Agl. in ARR filing	-	-	-	7238. 26	-	684.3 1

		<p>It seen from the above that the % Agl. Sales are at a range of 21-22% approximately in FY 2012-13 to FY 2014-15 (up to Jan'15) and difference in Agl. consumption in FY 2013-14 w.r.t. previous year FY 2012-13 and in FY 2014-15 (projected) w.r.t. to FY 2013-14 (actuals) is 324.68 MU and 684.31 MU respectively.</p> <p>However the methodology now being followed is scientific ISI methodology and approved by Hon'ble Commission and agricultural consumption is arrived keeping an eye on the number of agricultural services released year by year and maintaining same percentage range of agricultural consumption w.r.t. input</p>
	<p>f) NON-CONVENTIONAL ENERGY, ENDLESS LITIGATIONS AND TARIFF HIKES : Regarding the detailed account on how litigations with non-conventional energy units have been going on endlessly and how tariffs for the same are being increased over the years, with the kind of policy decisions being taken by the Governments and orders being given especially by the Regulatory Commission and Appellate Tribunal, desirability of entering into long-term PPAs with private NCE units has become questionable with consumer interest becoming a casualty. Encouragement to non-conventional energy does not mean going on a spree of entering into long-term PPAs with private developers and increasing tariffs for the same. Even in the face of projected availability of surplus power, entering into</p>	<p><u>RPPO:</u></p> <ul style="list-style-type: none"> • The Regulation No. 1 of 2012 dealing the Renewable power purchase obligation (RPPO) was issued by the erstwhile APERC in the year 2012 with mandatory purchase of RE (NCE) power with a quantum of 5% from total purchases (out of which 0.25% from solar sources) in a Financial year by obligated entities, viz, Distribution Licensees, Open Access and Captive Consumers. • The quantum of energy to be purchased by distribution licenses is to be re- looked into by considering the AP Reorganization Act-2014 (bifurcation of States). Issuance of fresh RPPO obligation is necessitated by considering the existing RE capacity as of now along with expected capacity in FY 2015-16 may be taken as initial base percentage quantum of RE energy mandated. It may be appropriate to increase by 10% in each subsequent year. • Notwithstanding the above, the maximum ceiling of RPPO of 5% may be limited to 3% during the control period, thereby less

long-term PPAs with private developers to purchase non-conventional energy is leading to higher costs for power purchase, as the rates at which different kinds of NCE shown in the ARR make it abundantly clear. Therefore, I request the Hon'ble Commission to reduce the percentage of NCE power to be purchased by the Discoms from the 5% determined by it under the existing Renewable Power Purchase Obligation order. Even then, the quantum of NCE power the Discoms have to purchase would increase in absolute terms in view of increasing sales of power. Fillip should be given to Research & Development for technological development and improvement to reduce cost of generation of NCE power especially solar and wind power. Instead of inviting bids and entering into long-term PPAs with private developers at higher costs especially for solar power, TSGENCO should be encouraged to fully make use of the incentives being given by the GoI and the State Government for setting up solar energy units and the power generated by them be supplied to agriculture during day time. That would help avoiding the kind of problems farmers cultivating under wells and borewells are facing due to staggered supply of power in two or three spells even during the night. If necessary, the Government has to provide necessary additional subsidy for the same.

burden on DISCOMs to purchase, there by deduction in retail supply tariff to the consumers.

Solar plants by GENCO:

- The issue of establishing the solar plants by TSGENCO by utilizing the incentives provided by GoI and GoTS is not in the purview of TS Transco/TSDISCOMs.

	<p>g) REDUCTION OF DISTRIBUTION LOSSES : The financial impact of failure of the Discoms in achieving targets of reduction of distribution losses as determined by the Commission should not be permitted to be included in ARR and collected from the consumers. As the Discoms themselves have admitted, there is scope for further reducing distribution losses, both technical and commercial. To the extent the Hon'ble Commission disallows excess agricultural consumption of power claimed by the Discoms, that should be added to distribution losses. Accordingly, I request the Hon'ble Commission to fix targets of reduction of distribution losses realistically not only Discom-wise but also circle-wise to infuse a sense of accountability at various levels, since there is a vast difference in distribution losses among various circles.</p>	<p>TSDISCOMS would strive for achieving the loss trajectory as specified by the Hon'ble Commission. TSDISCOMS also humbly submit to the Hon'ble Commission that it should either allow projection of Agriculture sales based on the actual sales and provide a low loss trajectory or disallowed Agl sales be recognized as losses and loss trajectory devised accordingly.</p>
	<p>h) TRUE-UP CLAIMS : The veracity and permissibility of true-up claims of the Discoms need to be examined thoroughly and pruned accordingly. Based on the information, without all the required details, submitted in the ARR volumes, it is not possible for us to examine and come to a conclusion on the veracity and permissibility or otherwise of true up claims of the Discoms. A separate public hearing on true up claims, making all relevant details available, is required, as has been the past practice with regard to FSA claims of the Discoms.</p>	<p>The True-up has been submitted by the licensee as per Clause 10 of the Regulation No. 4 of 2005. Hence the licensee has included the true-up claims for the control period in the current ARR (Aggregate Revenue Requirement) filings for the purpose of passing of gains/losses to the consumers.</p>

i) MAXIMUM CEILING PRICE FOR SHORT-TERM PURCHASES : Regarding directive given by APERC in its tariff order for 2013-14 on maximum ceiling on purchase price through short-term sources, the TS Discoms have replied that “the APPCC has finalized short term power purchases of 2000 MW RTC power on firm basis from 30.05.2014 to 28.05.2015, fixing the rates as follows: Generators located outside the State at Rs.3.52. Generators located within the State Rs.5.45 per unit.” For purchase of short-term power, competition should be among all interested suppliers, irrespective of locations from which they supply power. The Discoms have projected “possible price of Rs.6 per unit” for 2015-16. From which individual generators/traders the Discoms are/will be purchasing power on short-term basis, how much quantum, for which period and at what prices? The neo-liberal policies of the Central and State Governments in hindering progress of public sector utilities and pampering private sector units, often with scandalous proportions, in fuel and power sectors are leading unjustifiably to all-round imposition of additional burdens on consumers. They create scarcity for fuels and power, on the one hand, and in the name of reducing or overcoming scarcity for power and avoiding power cuts, resort to entering into contracts to purchase power especially on short-term basis at very high prices, on the other, all in the name of serving

Type	Capacity (MW)	Lowest rate (Rs./Unit)	Highest rate (Rs./Unit)
Within Telangana	1595	3.92	4.50
Within SR	330	5.99	6.54
Outside SR	287	5.90	6.09
Total	2212*		

It can be observed that different capacities have been contracted with different generators at various tariffs. Considering the corridor constraints, around 800 MW power at an average price of Rs. 6.00/Unit is expected

	<p>consumers, but serving private vested interests in practice. Implementing saner policies to ensure generation and supply of power at prudent costs to consumers availing all possible opportunities in a given situation is the real yardstick to judge whether the policies of the Government are pro-people or not. Judging by this yardstick, the policies of the Governments are anti-people and pro-corporate sector. In this connection, we welcome the repeated statements made by CM Sri Chandrasekhar Rao garu that new projects would be implemented by TS Genco as a step in the right direction. However, it is necessary to ensure that the projects are implemented in time and efficiently, confining cost of the projects to prudent levels, and leaving no scope for manipulations and avoidable cost escalations, in view of adverse findings in the reports of the Comptroller & Auditor General of India earlier on implementation of some of the projects by AP Genco.</p>	
8.	<p>8. DIRECTIVE ON MONITORING OF COST OF IMPORTED COAL PROCURED BY APGENCO AND NTPC NOT COMPLIED WITH : In response to several objections raised during public hearings, in its tariff order for 2013-14, the then APERC in the undivided Andhra Pradesh directed the Discoms: "The Discoms are directed to verify whether APGENCO is procuring imported coal through competitive bidding process, or under any guidelines issued in this regard by GoI, before admitting the Station wise power purchase bills claimed by APGENCO. Regarding NTPC Stations, DISCOMs have to take up</p>	<p>TSGENCO power stations are having coal linkage of 10.67 MT/Annum (SCCL-8.36MTPA & MCL-2.31MTPA) against the requirement of 13.16MT for the FY 2014-15. The linkage materialization from MCL is in order of 40%. To meet the requirement SCCL is supplying additional quantity over and above the linkage quantity. M/s.SCCL is claiming additional price for supply of additional quantity. However, the issue of payment of additional price to SCCL is under correspondence.</p>

	<p>the pricing issue of imported coal, if any, with CERC.” After a gap of nearly two years, the TS Discoms have replied: “TSGENCO is not utilizing imported coal.” This reply is strange and evasive, as if the responsibility of TS Discoms were confined to monitoring cost of imported coal, if only TS Genco imported and used the same, and ignoring the fact that they are getting power from projects of AP Genco and NTPC also. Therefore, I request the Hon’ble Commission to issue appropriate directions to TS Discoms in this regard. The Discoms also have replied : “TSGENCO projected its total coal requirement for FY 2014-15 as 131.60 Million Tons (MMT), as per Fuel Surcharge (Supply) Agreements the linkage is 106.70 MMT and the shortfall is being met by procuring additional quantity of Coal from M/s SCCL.” Is TSGENCO procuring additional quantity of coal from SCCL at the same price that is being paid for allocated coal of same grade or is it paying higher price for coal of same grade purchased additionally?</p>	
9.	<p>9. IMPACT OF IMPORTED COAL : In its tariff order for 2013-14, APERC had directed the four Discoms: “Distribution Licensees are directed to take up the issue of variation in GCV (lower GCV of blended coal than indigenous coal) of CG stations with NTPC and report compliance by 30th September, 2013. Licensees are directed to take up the matter with APGENCO for a critical examination of the variation in GCV and submit a report to the Commission by 30th September, 2013.” The TS Discoms have given the same strange reply : “TSGENCO is not utilizing imported coal.” When blended coal, imported and indigenous, is being used for generation of power, only average GCV would be available which must be above the GCV of indigenous coal when imported coal is</p>	--

costly and its quality is superior to that of indigenous coal. Is NTPC showing the quantum of imported coal used in specific stations and its cost, and whether its assured GCV is realized in actual usage separately in monthly bills? Or is NTPC showing average cost and GCV of coal - supposed to be a blend of imported and indigenous coal - of all its stations in the country for every one of its stations, irrespective of actual utilization or non-utilization of imported coal, its quantum and price in its monthly bills to the Discoms? Regarding quality of domestic coal, APERC had directed the Discoms : "The Discoms are directed to appoint independent coal auditors to ensure that the coal of agreed quality and price as per fuel supply agreement (FSA) is used for generation of power at all coal based Thermal Power Stations. Before making final payment such audit reports should be verified by the concerned officers of the DISCOMs." When the TS Discoms have replied that "TS & AP DISCOMS submitted in FY 2013-14 to the Hon'ble Commission (that it) may take a view on this aspect duly considering the Punjab ERC directions in the similar matter," they have deliberately ignored the fact that the Commission had given this directive in the tariff order for 2013-14 after the same submission was made by the Discoms. In view of the evasive replies given by the Discoms, I request the Hon'ble Commission to issue necessary directives to the Discoms and direct them to submit in detail relevant particulars like quantum, quality, price and assured GCV of imported and indigenous coal used by NTPC and APGENCO in each thermal station separately which supplies power to the Discoms. I also request the Hon'ble Commission to permit or reject, fully or partly, the cost of power purchase station-

	wise or unit-wise based on submission or non-submission of required particulars relating thereto and after examining the same thoroughly.	
10.	<p>10. RECOVERY OF DEMAND CHARGES FROM APGPCL : In response to the issue of recovery of demand charges from APGPCL raised by us, consequent to the orders issued by APERC, vide letter No.APERC/E-205/DD/Dist/2009 dated 6.5.2010, the Discoms replied that the amounts estimated by APPCC are around Rs.5 cr. and that necessary steps are being taken for recovery of the amount from APGPCL. Further, the amount foregone by DISCOMS towards difference of MD charges in H.T. consumers C.C. Bills will be calculated and necessary steps for recovery of the same will be made in due course, the Discoms replied. APERC directed the Discoms to file a comprehensive action taken report with details of excess amounts paid and extent of recovery made (Para 82 of Tariff Order for 2011-12). How much was the excess amount and how much was recovered from APGPCL?</p>	<p>Notices were issued to all the consumers for recovery of demand charges in respect of APGPCL. M/s APGPCL has filed writ petition in the Hon'ble High Court vide WPNO. 24594 of 2011 on the notices issued by the Discom to their shareholders.</p> <p>The counters were filed in Sep-2011 by the Discoms and the same was admitted by the Court.</p> <p>As the case has been pending for a long time, once again counter affidavit filed on 16.02.2013 by Discoms for vacating the stay petition. The case is still pending and the realization of amounts is subjudice</p> <p>The inflated demand charges (Rs5,05,90,298)in respect of APDISCOMS share in APGPCL stage-I were already recovered from February and March CC bills of 2011. Further an amount of Rs 4, 45,94,346/- have been recovered towards inflated demand charges in respect of participating industries. Further APGPCL had approached Hon High Court and the same is sub judice.</p>
11.	<p>11. REJECT PROPOSALS FOR TARIFF HIKE : Considering the above submissions, availability of surplus power, besides the subsidy implied to be provided by the Government, among others, I request the Hon'ble Commission to reject the proposals of the</p>	<p>In the Tariff Order for FY 2013-14, the average Cost to Serve (CoS) as approved by the Hon'ble Commission for the Telangana was Rs 5.46/Unit. Since then, there has been a significant increase in the average CoS during the year and the licensee expects the trend to</p>

	Discoms for tariff hike for 2015-16.	<p>continue for the ensuing year.</p> <p>The Licensee estimates the state level CoS for the year FY 2015-16 to be at Rs. 5.98/Unit. This implies that an increase of Rs.0.52/ Unit (10 % increase)</p> <p>The increase in the CoS is due to the following reasons</p> <ol style="list-style-type: none"> 1. The Network cost approved in FY 13-14 was Rs. 0.83/Unit and this has increased to Rs. 1.00 /Unit primarily due to increase in wages of employees, increased Capital Investment of the licensee. 2. The interest costs on the short term loans converted to Long term loan under Financial Restructure plan amounts to Rs. 141 crores has also increased the ARR in FY 2015-16. 3. The Licensees has projected a consolidated revenue deficit for FY 13-14 and FY 14-15 to the tune of Rs. 1463 Crs. The high revenue deficit for the period is primarily due to increase in Power Purchase cost, Network cost and other cost in FY 14-15 and no tariff revision in FY 14-15. <p>Hence, the Distribution licensee feels that the increased CoS should reflect appropriately in the tariff structure. Hence, the licensee proposes the tariff revision for various categories</p>
12.	<p>12. MEASURES NEEDED TO ENSURE ADEQUATE SUPPLY OF POWER TO CONSUMERS AT REASONABLE TARIFFS :</p> <p>Strengthening public sector utilities like TS Genco and NTPC to take up and implement proposed and new projects in time by providing necessary budgetary allocation for meeting equity, allocating and ensuring timely supply of adequate quantum of fuels required by them on priority basis and ensuring fair bidding processes for implementing projects with least possible capital cost; taking concerted measures in a planned manner to ensure growth in production of fuels like domestic coal and natural gas by giving priority to the public sector units in those areas, fixing prices</p>	<p>The Discoms, Transco and Genco are alive to the challenges highlighted by the objector and following are some of the key steps been taken to address the concerns</p> <p>TS Genco</p> <p>Following capacity additions (thermal) are been planned</p> <ul style="list-style-type: none"> - KTHP Stage II – 600 MW - KTHP Stage VII – 800 MW - Manuguru 1080 MW - Damarcherla A 1200 MW - Damarcherla B 3200 MW - KTHP Stage VII – 800 MW <p>In addition 250 MW from Hydel sources are planned. Issue of low PLFs due to coal shortage is been taken up with Coal India at all forums for</p>

	<p>of fuels in a rational manner based on prudent capital and operating costs and reasonable profit; clearing dues, if any, to the Discoms by the State government for additional power purchased at its behest earlier, improving efficiency of government's power utilities; effective measures for further reducing transmission and distribution losses, curbing theft and pilferage, collecting dues from consumers; implementing energy conservation measures in a phased manner based on cost-benefit analysis; avoiding manipulative terms and conditions in power purchase agreements with private power projects ; paying special attention to research and development to tap sources of renewable energy in an economical way gradually and fixing their tariffs in a prudent way are some of the main measures required to ensure adequate supply of power at reasonable tariffs to meet growing demand of consumers.</p>	<p>resolution. Further an MoU is entered with govt of Chattisgarh for supply of 1000MW</p> <p>Tsspdcl is taking the following measures for reduction distribution losses Theft control, proper categorization of services, replacement of elctromechnical meters with electronic meters, shifting of meters from inside to outside of the house, replacement of defective meters on monthly basis, inspection of UDC and OSL services, regularization of unauthorized services, sealing of meters</p>
13.	<p>13. CLAIMS OF TRUE UP & MYT: The Discoms have sought true up of additional expenditure or ARR deviation for 2013-14 and 2014-15. Leaving aside the permissibility or otherwise of such claims, a few relevant issues need to be taken note of here. Since FSA was repealed from 2013-14 onwards by the Commission, the Discoms claim that they are seeking true up for the revised revenue gap for 2013-14, contrary to their earlier claim that they "expect minimal or no FSA for FY 2013-14 with the proposed ARR." It confirms our contention put forth before APERC during the public hearing held by it on its proposal to repeal the system of FSA that the additional burdens that were being imposed under FSA would be imposed in the form of true up. Similarly, we had questioned the propriety of introducing the multi-year tariff system.</p>	<p>It can be observed that for FY 13-14, TSDISCOMS have either projected a True-down or a very minimal true up amount. Hence, the statement "expect minimal or no FSA for FY 2013-14" holds true. Since, there is no tariff increase for FY 14-15, the true up amount is significant. Hon'ble Commission has allowed for True-up of Retail business on an annual basis considering the difficulties in either recovering true up at the end of the control period or filing FSA on a quarterly basis.</p>

Experience of the 1st and 2nd control periods has confirmed repeatedly that Multi Year Tariff (MYT) has not benefited either the Discoms or its consumers. Every year the Discoms, in their ARR filings, have been explaining how regulatory objectives of a multi-year tariff regime could not be met and what kind of uncertainties they have been facing in making projections for a control period of five years. The MYT has resulted in accumulating huge sums proposed to be recovered by the Discoms, thereby causing financial difficulties to them, on the one hand, and imposing of such huge additional burdens, with carrying costs, on the consumers at the end of the control period concerned or during the next control period, on the other. In view of the same, we once again request the Commission to dispense with the MYT system and direct the Discoms and TS Transco to file their proposals annually. All the reasons for claiming true up of additional expenditure or revenue gap by the Discoms may not be permanent in nature. For example, shortage for domestic coal, natural gas and water in reservoirs is temporary in nature. Once these issues are solved, generation and supply of power would improve and cost of power purchase would ease substantially, thereby avoiding need for most of the proposed additional burdens of tariff hikes. Therefore, while examining and allowing claims of the Discoms for true up, the Commission has to differentiate between factors that are permanent in nature, for example, pay revision, and factors which are temporary in nature. If additional expenditure or revenue gap is caused by non-controllable and justifiable factors but are temporary in nature, that should not be allowed as true up in the form of hiking tariffs. Otherwise, it would result in frontloading

	<p>the tariff to cover even requirements of likely increase in costs of fuels and other costs in future which may lead to increase in power purchase cost and need for hiking tariffs or Government's subsidy support in future. In other words, the consumers would be saddled unjustifiably with the burden of making payments in advance for future requirements. Therefore, such claims should be permitted separately as a one-time payment, without considering them for hike in tariffs.</p>	
14	<p>14. ADDITIONAL BURDENS DUE TO FAILURES OF GOI AND RIL : The deliberate failure of the Government of India in ensuring supply of domestic coal and natural gas to the power projects in the State as per allocations made by it is leading to under-utilisation of existing installed capacity. As a result, the Discoms are forced to purchase power in the open market from merchant power plants and power traders at higher prices, on the one hand, and get power generated with costly imported coal, on the other, to reduce power shortage. Instead of increasing production of natural gas in the D6 field of KG basin to 80 million metric standard cubic meters per day (MMSCMD), Reliance Industries Limited has reduced it considerably. Due to the failure of RIL and the GoI to ensure production and supply of natural gas as per allocations made, the plant load factor (PLF) of the four old private power projects is projected to be 30% and of the four new private power projects of GVK extension, Gautami, Vemagiri and Konaseema as zero during the next financial year by the TS Discoms. Due to failure of Reliance Industries Limited in supplying natural gas as per allocations made, (and by ONGC, Cairn, etc. to some extent) huge installed capacity of the existing projects with whom the</p>	This subject is not under the purview of TSDISCOMS

Discoms had power purchase agreements is lying idle. The average cost of gas-based power even at the unjustifiable high cost of natural gas of the US\$ 4.20 per MMBTU is about Rs.3 per unit. While production and supply of natural gas has come down, the erstwhile UPA Government had decided to enhance the price of natural gas to \$ 8.4. per MMBTU based on an irrational formula worked out by the Rangarajan committee. Fortunately, that decision was put on hold as a result of the directive issued by the Election Commission in view of the scheduled elections to the Lok Sabha. However, the NDA Government has increased the price of natural gas to \$5.65 per MMBTU without any justification and without even making public on what basis or principle it has done so. It is increasing the cost of generation of power and power purchase cost and leading to imposition of additional burdens on consumers of power. While RIL had quoted a price of \$ 2.34 per MMBTU in an international bid floated by NTPC in the past, the empowered group of Ministers headed by the then Finance Minister, Sri Pranab Mukherjee, had decided a price of \$ 4.2 per MMBTU based on a contrived formula submitted by RIL. That price was linked to the price of international Brent crude oil at US\$ 60 per barrel. Even going by that irrational formula, the price of natural gas has to be reduced in view of slump in the price of crude oil in the international market well below \$ 60 per barrel. Strangely, there is no word of protest against the unjustifiable hike in price of natural gas from the Governments of Telangana and Andhra Pradesh, leave alone demanding the GoI to reduce the price rationally.

15.	15. DISCOMS SHOULD NOT SUPPLY POWER TO RESCOs AT LESS THAN COS : Discoms and Rescos are independent entities. The Discoms should not be permitted by the Commission to supply power to Rescos at less than the cost of service and impose additional burden on the consumes of Discoms. If Rescos are to be supplied power at concessional rates, it is for the Government to provide them subsidy.	Rescos are not existing in TSSPDCL
16.	16. HOLD SPECIAL PUBLIC HEARING ON FUNCTIONING OF THE COMMISSION : I request the Hon'ble Commission to hold a special public hearing, seeking suggestions from the public on its functioning itself, so that the present team of the Commission can get acquainted with the blunders committed in the past and improve and strengthen its functioning to protect larger consumer interest by acting independently, democratically, objectively, efficiently, transparently and in an accountable manner and gain respect and confidence of the people at large. The Commission should hold public hearings on all petitions and issues which will have financial bearing on the tariffs to be paid by the consumers.	Under the purview of Hon'ble Commission
17.	17. UNWARRANTED DELAY IN SUBMISSION OF ARR AND TARIFF PROPOSALS BY THE DISCOMS : The delay for more than two months in submitting ARR and tariff proposals by the Discoms to the Hon'ble Commission lacks justification. As a result of this avoidable delay, the Commission, obviously, with a view to completing the regulatory process and giving its tariff order for 2015-16 in time to be effective from 1 st April, 2015, could not give the normal one month period for interested public to submit their suggestions and objections. After the Discoms submitted their	The delay in filings by the licensee is mainly due to : Consequent to the state bifurcation on June 2nd 2014, for TSSPDCL, two circles Anantapur & Kurnool has been demerged and reassigned to APSPDCL. As the MYT tariff order issued by the Commission includes ARR of Anantapur & Kurnool circles for TSSPDCL, it is required to revise the Distribution costs for 3rd control period for FY 2014-15 to FY 2018-19. Hence the licensees has to segregate the financial statements in the event of state bifurcation as it forms the basis for revision of the Distribution costs from FY 2014-15 to FY 2018-19 and also needs time for firming up power/fuel availability and cost thereof from various

<p>tariff proposals to the Commission, and after publication of advertisement on 11.2.2015, calling for suggestions and objections, copies of ARR with tariff proposals were made available. As such, we have about twenty days to study the voluminous submissions of the Discoms and prepare our suggestions and objections and submit the same by the 7th March. (We have to do similar work in the case of ARR and tariff proposals of AP Discoms also) In view of paucity of time, some very important issues only could be covered in our objections and suggestions. From 12th March, the Hon'ble Commission is going to hold public hearings. It leaves inadequate time to the Discoms to send replies to the suggestions and objections filed and for us to study the same and prepare further submissions to be made during the public hearings. It leaves inadequate time to the Hon'ble Commission also to examine the suggestions and objections of the interested public and prepare and issue tariff order for 2015-16 by the 23rd March to make it effective from 1.4.2015. Also, I request the Hon'ble Commission to direct the Discoms to send their replies to my objections and suggestions by email followed by hard copies in time to enable me to study the same and make further submissions in person during the public hearings.</p>	<p>sources. Due to delay in preparation and receiving this information which would have a material impact on the overall ARR for the ensuing year and the measures to be adopted by the licensee in addressing it, the licensee is forced to submit the filings with delay so as to finalize the distribution costs and power purchase cost projections accurately. The purpose of filing objections is to receive the comments of the consumers broadly about the claims made by the Discoms, thereby the Hon'ble Commission would be obligated to examine the said claims in detail from the stand point of the objections that was raised by consumer/s. No part of the existing regulations mandates requirement of thirty days time.</p> <p>However, the time given by the Hon'ble Commission is almost 1 month which is reasonably sufficient to respond on the claims of the Discoms.</p>
---	--

S.No	Summary of Objections / Suggestions	Response of the Licensee
4. P. Kodanda Ramaiah, 712, Turquoise Block, My Home Jewel, Madinaguda, Hyderabad - 49		
1.	TSSPDCL is not acting as a company registered under companies act 1956; it is acting as state electricity dept. It submitted these proposals, after taking approval from Govt, not based on its needs, did not cover its deficit fully and took abnormally long time for this work.	<p>The delay in filings by the licensee is mainly due to :</p> <p>Consequent to the state bifurcation on June 2nd 2014, for TSSPDCL, two circles Anantapur & Kurnool has been demerged and reassigned to APSPDCL. As the MYT tariff order issued by the Commission includes ARR of Anantapur & Kurnool circles for TSSPDCL, it is required to revise the Distribution costs for 3rd control period for FY 2014-15 to FY 2018-19. Hence the licensees has to segregate the financial statements on the eve of of state bifurcation as it forms the basis for revision of the Distribution costs from FY 2014-15 to FY 2018-19 and also needs time for firming up power/ availability and cost thereof from various sources.</p> <p>Due to delay in preparation and receiving this information which would have a material impact on the overall ARR for the ensuing year and the measures to be adopted by the licensee in addressing it, the licensee is forced to submit the filings with delay so as to finalize the distribution costs and power purchase cost projections.</p>
2.	This company made these proposals in connivance with TSNPDCL and not as an independent identity. It may be noted, earlier all the 4 companies in the state of A.P. used to come out with the same rates for around 14 years. After the bifurcation of the state, the 2 companies in Telangana came out with rates different from those of A.P. Evidently, these proposals are not based on the field conditions.	TSSPDCL&TSNPDC have filed the ARR proposals separately as independent licensees.As the field conditions &subsidy support received from the govt are different the tariffs in the two states may be different.
3.	This Tariff proposal is illegal. Proviso (g) of Section 61 of The Electricity Act 2003 ordains the tariff to progressively reflect the cost of supply. TSSPDCL proposes to sell, a considerable part of its power purchases, at a very low	The Licensee is obligated to provide supply to all class/category of consumers wherein some section of consumers needs to cross subsidize the other section of

S.No	Summary of Objections / Suggestions	Response of the Licensee
	rate and even freely.	consumers. The legislature by amending Section 61(g) of the Electricity Act by Act 26 of 2007 by deleting the word 'eliminating cross subsidies' has expressed its intent that cross subsidies may not be eliminated.
4.	There is a deliberate attempt to scuttle any meaningful evaluation of the proposed tariffs by adopting a very high no. of categories and slabs. No study is conducted to arrive at so many slabs.	The Discom has proposed to continue the existing slabs to extend the benefit to the poor & low consumption consumers.
5.	Provision (b) of Section 61 of Act 2003 orders the functioning of the distribution company to be on commercial lines. It is evident that the company is being run, on the whims and fancies of the officials, as a social welfare organization. This is in sharp contrast to BSNL, APSRTC etc. Against all commercial principles, the DISCOM is proposing higher tariffs to bulk consumers.	The Licensee is obligated to provide electrical supply to all categories of consumers and in that way some category of consumers needs to be cross subsidise the other category of consumers.
6.	The Act contemplates progressive reduction of tariff differences. Now the proposal of DISCOM is increasing the difference.	The existing tariffs are approved for the FY 2013-14. The same tariffs are being continued for FY 2014-15 also. Though there is 13.83% increase in the cost of service from FY 2013-14 to FY 2015-16, Discom has proposed 5.75%tariff hike for most of the categories .For agriculture and domestic category in the range of 0-100 units consumption there is no tariff hike.
7.	The wheeling charges and losses are to be considerably reduced for non-conventional energy.	Wheeling charges & losses are determined by Hon'ble Commission

S.No	Summary of Objections / Suggestions	Response of the Licensee
5. G. Prabhakar Rao, Plot No.241/102, Opp:Jaya Residency, Electric Tower Line Road, Jayanagar, Kukatpally, Hyderabad - 72		
1.	<p>పైన ఉదహరించిన విజ్ఞాపన, విషయము, రిఫరెన్సులలోని సాంకేతిక సమాచార సారాంశములను మీకు 100 % పారదర్శక రీతిలో సవినయముగా ' పవర్ పాయింట్ ప్రజంటేషన్' ప్రక్రియ ద్వారా ముఖ్యము 'TS' డిస్కం సంస్థల లో ప్రస్తుతము ఇష్టారాజ్యముగా 'LT' డిస్ట్రిబ్యూషన్ సిస్టమ్ 11KV/415V ట్రాన్స్ఫార్మర్ల నిర్మాణములో, బిఐఎస్ - ఐఎస్ఐ సాంకేతిక భద్రతా ప్రమాణములను కనీస రీతిలో పాటించకుండా, సంబంధిత డిస్కం అధికారులు దొడ్డు ఫ్యూజ్ వైర్లు, ఫ్యూజ్ క్యారీయర్లు లేకుండానే క్యారీయర్ బేస్ లకే తగిలిస్తున్న తీరును మీరు గమనిస్తే, ఈ చర్యల వల్ల ట్రాన్స్ ఫార్మర్ల కాలిపోవాలి గాని, ఓవర్ లోడ్ తో మాత్రము ఫ్యూజులు మాత్రము పోవు సార్!? ఇలా జరుగుతూపోతుంటే, లూజ్ కనెక్షన్ల వల్ల రైతుల 3 ఫేస్ మోటర్లు కాలిపోతున్నాయ్ -- రైతుల ఆత్మ హత్యల గురించి నిత్యము మన ప్రసార మాధ్యమాల ద్వారా తిలకిస్తున్నాము కదా ? ! ఈ నివారణ సాంకేతిక ప్రక్రియ అంతా, మీ అధీనములోనే వున్నది కదా! కిం కర్తవ్యము?</p>	<p>టీ.ఎస్.ఎస్.పి.డి.సి.ఎల్ procurement విభాగము ఒకపద్ధతిప్రకారము e-procurement పద్ధతిన వివిధరకాల పరికరాలను కొనుగోలు చేస్తుంది. అన్నిరకాల పరికరాలు ISI ప్రమాణాల ప్రకారము మరియు సెంట్రల్ ఎలక్ట్రిసిటీ అథారిటీ (సిఇఎ) సూచనల ప్రకారము కొనుగోలు చేయడం జరుగుతుంది. ఈ అన్ని ప్రమాణాలను టెండర్ స్పెసిఫికేషన్ లో పొందుపరచడం జరుగుతుంది. అలా ప్రోక్యూర్ చేసిన పరికరాలను, ఆర్. ఇ.సి ప్రమాణాల ప్రకారము మరియు సిఇఎ, ఇఎ- 2003 భద్రతా ప్రమాణాలు అనుసరించి బిగించడం జరుగుతుంది. ప్రస్తుతం టీ.ఎస్.ఎస్.పి.డి.సి.ఎల్ 3 స్టార్ రేటింగ్ ఉన్న DTR లను కొనడం జరుగుతుంది.</p>
2.	<p>"శివుని ఆజ్ఞ లేనిదే చీమ అయినా కుట్టదు" సామెతలా -- మీ ఆజ్ఞ / అనుమతి/ ఆదేశములు లేనిదే, సంబంధిత ట్రాన్స్మిట్టర్, డిస్కం+ ప్రభుత్వ అధికారులు తగిన రీతిలో బిఐఎస్ / ఐఎస్ఐ ' సాంకేతిక భద్రతా ప్రమాణములు పాటించి అమలు చేయరనేది అనుభవ పూర్వకముగా తెలుసుకున్న నగ్న సత్యము సార్ !? దయచేసి మీరు 'TS' మన రాష్ట్రము, డిస్కం + ట్రాన్స్ కో సంస్థలను నష్టాల ఊబిలో నుండి బయటకు తీసి " లాభాల దిశలో" పయనింప జేయాలంటే, మీరు ముఖ్యముగా మన దేశములో అందుబాటులో నున్న సాంకేతిక పరికరములు టూల్స్ వినియోగించి, విద్యుత్ పొదుపు సాంకేతిక చర్యలు సంబంధిత కార్మికులు చేపట్టి ఆచరించే విధముగా ప్రపంచ బ్యాంకు వారి 'MOU' లో పొందు పరిచిన విధముగా తగిన రీతిలో ట్రయినింగ్ ఇచ్చి "ఓ&మ' పనుల నిర్వహణ తీరు ను మెరుగు పర్చి</p>	<p>TSSPDCL పరిధిలో ఎనర్జీ పొదుపు చర్యలోభాగంగా " బచత్ లాంప్ యోజన " అనేకార్యక్రమము, "బ్యూరో ఆఫ్ ఎనర్జీ ఎఫిషియన్సీ" వారి సహకారంతో చేపట్టబడినది. ఇందులో భాగంగా incandescent బల్బులను, CFLబల్బులతో మార్చే పనిని M/s. C-Quest Capital Green Ventures అనే సంస్థకు ఇవ్వబడినది. ఆరు ఆపరేషన్ డివిజన్లలోని దాదాపు 6.5 లక్షల CFL బల్బులను ఇళ్ళకు సరఫరా చేయడమైనది.</p>

S.No	Summary of Objections / Suggestions	Response of the Licensee
	<p>సత్యలితములు సాధించాలంటే, మీరు సరియైన రీతిలో స్పందించి కాల పరిమితితో కూడిన విధానపరమైన సాంకేతిక చర్యలు ట్రాన్స్ కో + డిస్కం అధికారులను ఆదేశించనిదే మన రాష్ట్రము విద్యుత్ పొడుపు చర్యలు 40% = రూ. 36,000 కోట్లు = 6,000 MW సాధించలేమని మా ప్రగాఢ విశ్వాసము సార్ !? సాంకేతిక నిపుణులైన మీరు తగిన రీతిలో సాంకేతిక భద్రతా ప్రమాణములు (BIS) చేపట్టే విధముగా ఆదేశించనిదే ఆ దేవుడు కుడా నష్టాల ఊబిలో నున్న డిస్కం సంస్థలను బాగు చేయలేదు సార్!? అంతా మీ దయ, మీ సాంకేతికమైన 'ఓ&ఎం' ప్రక్రియలు ప్రణాళిక బద్ధముగా చేపట్టవలసినదిగా డిస్కం సంస్థల వారికి ఇచ్చే సాంకేతిక పరమైన ఆదేశముల మీదనే ఈ రాష్ట్రము+ ప్రజల భవిష్యత్తు ఆధార పడియున్నది సార్.</p>	
3.	<p>ఈ సాంకేతిక ప్రక్రియ ను 'O&M- ACTION PLAN ' ఎలా? ఆచరణలో యోగ్య మైన కార్యాచరణ ప్రణాళిక రూపకల్పన తో సత్యలితములతో టారిఫ్ పెంచకుండానే, సర్ చార్జీలు విధించకుండానే 'డిస్కం సంస్థ' లను లాభాల దిశలో ఎలా పయనింప జేయవచ్చునో, మీకు సవివరముగా యాక్షన్ ప్లాన్ వివరములను పారదర్శక రీతిలో ' పవర్ పాయింట్ ప్రజంటేషన్' ప్రక్రియ ద్వారా విన్నవించుటకు తగిన సమయమును ఇచ్చి అనుమతి ఇవ్వవలసినదిగా మీ ప్రత్యేక పరిశీలనార్థమై విజ్ఞాపన సమర్పణ.</p>	గౌరవ కమిషన్ వారి పరిధిలో కలదు.

Sl.No	Summary of Objections/Suggestions	Response of the Licensee
	6. పి.ఎస్.అర్. కృష్ణప్రసాద్, ఇంటి నెం. 5-5-23/21, సంగీత్ నగర్, కూకట్ పల్లి, హైదరాబాద్ - 500 072	
1.	వ్యవసాయపు మోటార్లకు విద్యుచ్ఛక్తి ఉచితంగా ఇస్తున్నారు. కాని న్యూట్రల్ వైర్ యివ్వనందున టెస్ట్ లామ్పులకై రైతులు భూమిలో ఇనుప పలుగు కాని, కడ్డీ కాని, మేకుగాని పాతి ఎర్త్ వైర్ (న్యూట్రల్) గా వాడుతున్నారు. ఏ మాత్రము తేడా వున్నా ఎలక్ట్రిక్ షాక్ తాకి ప్రానాపాయమునకు కారణమవుతున్నది. కనుక న్యూట్రల్ వైర్ ను ఇచ్చే విధంగా నిబంధనలను మార్చండి. టెస్ట్ లామ్పులకు వినియోగించే విద్యుచ్ఛక్తి అతి స్వల్పము. (భోజనము ఉచితంగా పెడుతూ మంచి నీళ్ళకు చార్జి చేయటం బాగుంటుందా?)	వ్యవసాయ విద్యుత్ కనెక్షన్ సరఫరా కోసం LT AB కేబుల్ 3x16 sqmm + 1x25 sqmm ను వాడడము జరుగుతుంది. దీనిలో 1x25 sqmm వైర్ అచ్చగా న్యూట్రల్ కొరకు ఉంది.
2.	మనకు స్వతంత్రం వచ్చేనాటికి కేవలం పట్టణాలలో మాత్రమే విద్యుచ్ఛక్తి వుండేది. పల్లెటూళ్ళలో వుండేది కాదు. గ్రామాలకు విద్యుచ్ఛక్తి యివ్వమని కోరితే ఆనాడు. మద్రాస్ స్టేట్ ఎలక్ట్రిసిటీ బోర్డు వారు 'కేవలం దీపాలకు మాత్రమే గ్రామాలకు విద్యుచ్ఛక్తి యిస్తే వచ్చే రాబడి నిర్వహణ ఖర్చులకు కూడా చాలదు. కనుక రైతులను వ్యవసాయ మోటార్లను వినియోగించమనండి. పెద్ద రైతులకు డొమెస్టిక్ కం ఎగ్రికల్చర్ మోతల్లుగాకూడా ఉపయోగాపడతవి అని సలహా చెప్పి" ఏర్పాటు చేసిరి. ఇప్పుడు కొందరు ఆ విషయము తెలియని ఉద్యోగులు పొలానికే మీ మోటారు నీళ్ళు - మనుషులకు - గొడ్లకు కాదు! అంటున్నారు, మీరేమంటారు?	వ్యవసాయము ఇచ్చిన కనెక్షన్ పశువుల త్రాగటానికి వాడుకునేదుకు ఎలాంటి అభ్యంతరాలు లేవు. నీటిని ఇళ్ళకు సరఫరా చేసి వ్యాపారం చేస్తే మరియు వ్యవసాయేతర పనులకు వాడుకునేనాటికి అభ్యంతరం
3.	కొన్ని దశాబ్దాల పాటు మీటర్ రెంటు పేరా 50 పైసలు వసూలు చేసేవారు. ప్రస్తుతం దానిని రూ. 30-00 నుండి రూ. 70-00 వరకు వసూలు చేస్తున్నారు. ఎంతవరకు సబబు?	లైసెన్సీ వారు వినియోగదారుల నుండి మీటర్ రెంట్ వసూలు చేయడం లేదు. కస్టమర్ చార్జీలు కమిషన్ నిర్ణయం మెరకు సేకరిస్తునాము.
4.	లోగడ కేంద్ర ప్రభుత్వానికి చెల్లించే ఎలక్ట్రిసిటీ డ్యూటీ ని ఎ.పి.ఎస్.ఈ.బి. చెల్లించేది. దీనిని ప్రజల నుంచి వసూలు చేయటం మొదలు పెట్టారు.	డిస్కాం వారు G.O.No.277, dt 09.12.1994 ప్రకారం వినియోగదారుల నుండి ఎలక్ట్రిసిటీ డ్యూటీ ని వసూలు చేసి రాష్ట్ర గవర్నమెంట్ వారికి చెల్లించడం జరుగుతున్నది.

5.	ఒక వైపున ఫ్యూయల్ సర్పార్టీ వసూలు చేస్తూ మరో వైపున యూనిట్ చార్జీలను పెంచుతున్నారు. ఏదో ఒకటి చేయండి, రెండు రకాల వాయింపులు వద్దు.	గౌరవ కమీషన్ జారి చేసిన రెగ్యులేషన్ 2/2013ను అనుసరించి ఇంధన చార్జీల సర్దుబాటు విధానమును సంబంధించిన రెగ్యులేషన్ 01.04.2013 నుండి గౌరవ కమీషన్ వారు డిలిట్ చేసారు.
6.	ఈ సేవా కేంద్రాలలో చెల్లించే బిల్లులకు - వసూలు ఫీజు డిపార్ట్ మెంట్ భరించలేదా? భవిష్యత్ లో జీతాల నిమిత్తం అనే కాలం కూడా బిల్లుల్లో చేరుస్తారా?	ఆంధ్ర ప్రదేశ్ ప్రభుత్వం విడుదల చేసిన జి.ఓ.ఆర్+నెం.31 తేది 22.02.2012 ప్రకారము విద్యుత్ బిల్లుల వసూళ్లు చేయుటకు నిర్దేశించిన కేంద్రములకు లావా దేవీల చార్జీలు (Transaction Charges) వినియోగదారుల నుండి వసూలు చేయుటకు నిర్ణయించడ మైనది. అందు వలన ఈ-సేవ కేంద్రాలు వినియోగదారుల నుండి ఇట్టి చార్జీలను వసూలు చేయబడును.
7.	ప్రభుత్వం నుంచి విద్యుత్ సంస్థలకు రావలసిన సొమ్ము సరిగా రావటం లేదని చెప్పుకుంటున్నారు. ఇవ్వని దోషం ప్రభుత్వానిదా? అడగని దోషం సంస్థలదా?	గవర్నమెంట్ క్రమం తప్పకుండా సబ్సిడీ విడుదల చేస్తుంది. వివిధ ప్రభుత్వ శాఖల విద్యుత్ బకాయిల వసూళ్ళ కోసం విద్యుత్ కంపెనీలు ప్రభుత్వం తో ఎప్పటికప్పుడు సంప్రదింపులు జరుపుచున్నది.
8.	చివరకు ప్రధానమంత్రి కూడా తగినంత విద్యుచ్ఛక్తి లేక ఉత్పత్తి తగ్గి, జి.డి.పి. పడిపోవడం, విదేశీ మారక నిల్వలు తరిగిపోవటం, నిరుద్యోగం పెరగటం మొదలైన అనర్ధాలు సంక్రమిస్తున్నాయన్నారు లోగడ. అమ్ముకోవటానికి తగినన్ని సరుకులు లేక దివాలా తీసే దుకాణం చందంగా అమ్ముకోటానికి విద్యుచ్ఛక్తి లేక విద్యుత్ సంస్థలు ఆర్థిక ఇబ్బందులలో కూరుకుపోతున్నవి. ప్రభుత్వ రంగంలో ఉత్పత్తి - పంపిణీ - పెరిగితేనే సంస్థలకు - ప్రజలకు - పరిశ్రమలకు మేలు జరుగుతుంది.	లైసెన్స్ వారి పరిధిలో లేని అంశం.
9.	అనేక ప్రభుత్వ రంగ శాఖలలో టేలిస్కోపిక్ బిల్లింగ్ విధానాన్ని అనుసరిస్తుండగా విద్యుత్ సంస్థలు అందుకు భిన్నంగా బిల్లులు చేయాలనుకోవటం సబబు కాదు.	లైసెన్స్ వారు డొమెస్టిక్ కేటగిరి నందు టేలిస్కోపిక్ విధానమునే అనుసరిస్తున్నారు.
10.	డొమెస్టిక్ కేటగిరీలో 9 రకాల విద్యుత్ గణన అంచెలు వుండాలా? పెతనం ఎవరు చేసినా 3అంచెలు లేదా 4అంచెలకు పరిమితం చేయండి. సంస్థలలో వున్న లోపాలను సవరిస్తూ ప్రభుత్వం	తక్కువ వినియోగం ఉన్న మధ్య తరగతి వినియోగదారులపై భారం పడకుండా స్లాబులు నిర్ణయించడమైనది. లైసెన్స్ వారు విద్యుత్ లాస్ లను క్రమ క్రమంగా

	<p>ఇవ్వవలసిన సొమ్మును తీసుకుంటూ ముందుకు పోతే ప్రజలపై భారం మోపవలసిన అవసరం వుండదు.</p> <p>లోగడ ఐ.ఆర్.సి. ఆమోదించిన విద్యుత్ చార్జీలపై ప్రతిపక్షాల ఆందోళనలను ద్రిప్టిలో ఉంచుకుని ఆనాటి ముఖ్యమంత్రి గౌ. కిరణ్ కుమార్ రెడ్డి ఆదేశాల మేరకు సవరించి అమలు చేయుచున్న విద్యుత్ చార్జీల పట్టిక గందరగోలంగా తయారైంది. కనీసం యిప్పుడైనా ఆ గందరగోళ పట్టికను సవరించకుండా మక్కికి మక్కి కొద్దిపాటి చార్జీల పెంపుతో ప్రతిపాదించటం సబబేనా?</p> <p>ఇప్పటికైనా పట్టికను క్రమ పద్ధతిలో ఉండేటట్లు గణన అంచెలు చాలా పరిమితంగా ఉండేటట్లు, ఖచ్చితంగా టేలిస్కోపిక్ విధానంలో ఉండేటట్లు క్రోడీకరించి అమలు చేస్తే బాగుంటుంది.</p>	<p>తగ్గించడానికి నిరంతరం ప్రయత్నం చేస్తున్నారు. అయినప్పటికీని పెరుగుతున్న ఆదాయ ఆవశ్యకతకు అనుగుణంగా లైసెన్సీ వారు నామమాత్రంగా 5.75% (వ్యవసాయం, 0-100 వినియోగం ఉన్న డొమెస్టిక్ వినియోగదారులను మినహాయించి) వరకు టారిఫ్స్ పెంచడం ప్రతిపాదించడమైనది.</p>																								
11.	<p>టేలిస్కోపిక్ బిల్లింగ్ విధానాన్ని ఎట్టి పరిస్థితిలోనూ విడనాడవద్దని ఐ.ఆర్.సి. మీటింగ్ లో లోగడ ప్రస్తుత మంత్రివర్యులు హారీష్ రావు గారు, తెలుగు దేశం నాయకులు రేవంత్ రెడ్డి గారు, సి.పి.ఐం. నాయకులు బి.వి. రాఘవులు గారు మరియు ప్రజలు విన్నవించిరి. కనుక టేలిస్కోపిక్ విధానాన్ని వీడవద్దు. గణన అంచెలను తగ్గించేతందుకు నేను యిచ్చే సూచనలను పరిశీలించండి.</p> <p>100 యూనిట్ల లోపు ప్రస్తుతం అసలు చార్జీ పెంచకుండా భవిష్యత్ లో ఒకసారి ఎక్కువగా పెంచితే జనం ప్రతిఘటిస్తారని మరవకండి.</p> <table border="1" data-bbox="322 1039 1451 1380"> <thead> <tr> <th colspan="2">ఎల్.టి. గృహ వినియోగము</th> <th colspan="2">ఎల్.టి. గృహేతర/వాణిజ్యం</th> </tr> <tr> <th>యూనిట్లు</th> <th>ఎనర్జీ చార్జీలు</th> <th>యూనిట్లు</th> <th>ఎనర్జీ చార్జీలు</th> </tr> </thead> <tbody> <tr> <td>0-50</td> <td>1.50</td> <td>0-50</td> <td>6.00 లేదా</td> </tr> <tr> <td>50-100</td> <td>2.60</td> <td></td> <td>5.75</td> </tr> <tr> <td colspan="2">లేదా</td> <td>50-100</td> <td>7.00</td> </tr> <tr> <td>0-100</td> <td>2.00 లేదా 2.50</td> <td>100-200</td> <td>8.00</td> </tr> </tbody> </table>	ఎల్.టి. గృహ వినియోగము		ఎల్.టి. గృహేతర/వాణిజ్యం		యూనిట్లు	ఎనర్జీ చార్జీలు	యూనిట్లు	ఎనర్జీ చార్జీలు	0-50	1.50	0-50	6.00 లేదా	50-100	2.60		5.75	లేదా		50-100	7.00	0-100	2.00 లేదా 2.50	100-200	8.00	<p>ఇది కమిషన్ పరిధిలోనిది.</p>
ఎల్.టి. గృహ వినియోగము		ఎల్.టి. గృహేతర/వాణిజ్యం																								
యూనిట్లు	ఎనర్జీ చార్జీలు	యూనిట్లు	ఎనర్జీ చార్జీలు																							
0-50	1.50	0-50	6.00 లేదా																							
50-100	2.60		5.75																							
లేదా		50-100	7.00																							
0-100	2.00 లేదా 2.50	100-200	8.00																							

100-200	3.75	200 పైన ఎంతైనా	9.00	
200-300	7.00			
300 పైన ఎంతైనా	8.00			
టెలిస్కోపిక్ విధానంలో బిల్లు				
ఎడ్వర్జెజ్ మెంట్ యూనిట్ రూ. 10.00 ఎన్ని యూనిట్ లైనా				
(యూనిట్ చార్జీలను యూనిట్ కు రూ. 10.00 మించి వసూలు చేస్తే అమెరికాను మించిన చార్జీలు కాగలవు. గమనించండి)				

S.No	Summary of Objections / Suggestions	Response of the Licensee
	7. Thimmareddy, Convenor, People's Monitoring Group on Electricity Regulation, 139, Kakatiya Nagar, Hyderabad – 500008	
1.	<p>2.1 According to Section 64 (3) of the Electricity Act, 2003 licensees have to file application for determination for tariff one hundred and twenty days before the said tariffs come in to force. If the new tariff is to come in to force by 1st April 2015 application for new tariff should have reached the Commission by last week of November, 2014. TSDISCOMs are reported to have submitted ARR and Tariff on 7th February, 2015, involving high drama. According to newspaper reports even utility officials were not aware of this submission. Until the Public Notice was issued in the Newspapers on 11th February there were doubts about this submission. One of the reasons adduced to this delay was the mistakes that have crept in to this filing. But a cursory scan of the filings shows that there are still many errors. This also sows lack of transparency and accountability in this process.</p> <p>2.2 The whole process under way to determine electricity tariff for the financial year 2015-16 appears to be violation of due process enshrined under the E – Act.</p>	<p>The delay in filings by the licensee is mainly due to :</p> <p>Consequent to the state bifurcation on June 2nd 2014, for TSSPDCL, two circles Anantapur & Kurnool has been demerged and reassigned to APSPDCL. As the MYT tariff order issued by the Commission includes ARR of Anantapur & Kurnool circles for TSSPDCL, it is required to revise the Distribution costs for 3rd control period for FY 2014-15 to FY 2018-19. Hence the licensees has to segregate the financial statements in the event of state bifurcation as it forms the basis for revision of the Distribution costs from FY 2014-15 to FY 2018-19 and also needs time for firming up power/fuel availability and cost thereof from various sources. Due to delay in preparation and receiving this information which would have a material impact on the overall ARR for the ensuing year and the measures to be adopted by the licensee in addressing it, the licensee is forced to submit the filings with delay so as to finalize the distribution costs and power purchase cost projections accurately.</p>
2.	<p>2.3 In the rush to come out with the tariff order by 23rd March the public has been denied sufficient time to scrutinize the filings of the DISCOMs. Under the new Act at least 30 days time should have been given to the public to respond in writing.</p>	<p>The purpose of filing objections is to receive the comments of the consumers broadly about the claims made by the Discoms, thereby the Hon'ble Commission would be obligated to examine the said claims in detail from the stand point of the objections that was raised by consumer/s. No part of the existing regulations mandates requirement of</p>

	<p>The public shall be given at least 30 days time from the day of publication of new tariff proposals. According to the Public Notice issued on 11th February last date for filing suggestions/objections is 7th March and the first public hearing on tariff proposals will take place on 12th March. It is doubtful whether DISCOMs will be in a position to go through the suggestions/objections filed send their responses to the public as well as the Commission in such a short time. While the public hearings will be over by 14th March the Commission is expected to come out with the Tariff Order by 23rd March, after due consultation with the Government of Telangana State regarding the quantum of subsidy available, for the new tariffs to be applicable from 1st April. Under such unseemly haste it is doubtful whether the Commission will be able to do justice to the sector in general and also balance interests of all stakeholders in the sector.</p>	<p>thirty days time.</p> <p>However, the time given by the Hon'ble Commission is almost 1 month which is reasonably sufficient to respond on the claims of the Discoms. Further any delay in issuing the tariff order will cause loss of revenue to the Discoms; the hon commission is requested to issue the order such that the new tariff will be effected from April 1st 2015.</p>
3.	<p>2.4 Though state bifurcation may be one of the issues that have led to the delay DISCOMs cannot avoid their statutory duty to file the tariff applications in time and it is also one of the functions of the Commission to see that DISCOMs discharge their responsibilities efficiently.</p>	<p>Despite genuine efforts of the licensee there was a delay in Tariff & ARR filings due to the reasons explained above.</p>
4.	<p>3.1.1 According to the provisions of the Andhra Pradesh Reorganization Act, 2014 Telangana State and residuary state of Andhra Pradesh have to share power generated by power plants located in both the states. An examination of the ARR and Tariff filings of TSDISCOMs and APDISCOMS shows that there is no common understanding between the two states in sharing the power generated in both the states. In fact differences and its</p>	<ul style="list-style-type: none"> • In accordance with the Clause C (2) of schedule XII of the AP Reorganization Act and as per G.O.Ms.No.20, DT: 08.05.2014, the allocation of power generated from the existing and the ongoing power plants located in both the states should be in the ratio of 53.89% & 46.11% respectively for Telangana and Andhra Pradesh. • Government of Telangana on behalf of TSDISCOMs have already submitted its views on the sharing of the power from both the

impact are substantial. The following table summarises these differences:			Central Generating Stations and as well as the State owned Power Generating stations located in AP & Telangana states, before the Committee constituted by MoP, Govt of India, under the chairmanship of Chairperson/CEA, to resolve the issues cropped up post state bifurcation between the TSDISCOMs and APDISCOMs. Decision of the Committee is awaited.
Issue	Telangana State DISCOMs	Andhra Pradesh DISCOMs	
APGENCO thermal units – DSTPP	Claimed 53.89% power	Claimed 100% power	
TSGENCO units – KTPP II	Claimed 53.89% power	Did not claim any power	
Inter state Hydel units	Claimed 41.68% (population percentage) citing provisions of AP Reorganization Act.	Claimed 100% power	
GENCO Hydel units	Claimed 53.89% from units located in AP as well as Telangana	Claimed 100% power hydel units located in AP did not claim power located in Telangana	
Central Generating Stations	Claimed 52.11% instead of 53.89% citing draft recommendations of CEA	Claimed 46.11%	
IPPs - Hinduja	Claimed 53.89% power	Claimed 100% power	
NCE - Wind	Claimed power from wind energy plants located in Anantapur and Kurnool districts of AP	Claimed 100% power	

	<p>3.1.2 DISCOMs of both the states differ on total quantum of power available from each plant. For e.g., according to TSDISCOMs estimate power available from Dr NTTPS units I, II and III will be about 8,057 Mu and according to APDISCOMs it will be about 7,554 MU. Similarly, DISCOMs of both the states also differ on estimation of fixed cost burden from each plant.</p>	
5.	<p>3.1.3 TSDISCOMs in their filings submitted that generation tariffs based on the Generation Regulation are yet to be determined. This is particularly the case with state owned GENCOs. In the background of AP Reorganization Act, 2014 the question arises as to who will determine the tariff for GENCO power plants? If it is the SERCs which determine tariffs then the next question will be which SERC will determine which plant's tariff. If the role devolves on CERC as the plants become inter state plants one would like to know the steps taken by the GENCOs as well as DISCOMs in getting CERC's approval for PPAs for these plants. Similar questions also arise in the case of tariff determination for HNPCL plant at Visakhapatnam and APPDC's DSTPP at Krishnapatnam.</p>	<p>Telangana discoms will take appropriate steps as per the AP Re Organization act</p>
6.	<p>3.1.4 Even when the Chief Minister of Telangana state is saying that the state has to endure power shortages for the next three years TSDISCOMs filings show that the state will have 8,150 MU of surplus power at its disposal. Similarly, according to APDISCOMs' filings AP will have 11,000 MU of surplus power. This anomalous situation arises due to the above differences in views related to power sharing and consequent estimation of power availability.</p>	<p>TSDISCOMS have projected the energy availability from various energy sources as per the AP Reorganization Act and as per best estimates of parameters like coal availability, maintenance schedules, PLF etc. from existing stations as well as upcoming stations of Andhra Pradesh like Krishnapatam, Hinduja etc. If these stations achieve CoD as per the projection of ARR and share power with Telangana as per AP Re organization Act, this would result in the Energy surplus scenario as projected in the ARR</p>
7.	<p>3.1.5 Without settling these issues it will not be possible to estimates the costs in supplying power to the consumers in both the states and also determine tariffs. One way to solve this</p>	<p>It is not under purview of Licensee</p>

	<p>is for the ERCs of AP and TS sit together evolve a mechanism. But the outcome from such exercise may not be acceptable to some on either side of the dispute. Another way is for the two state governments solve this through discussions. Under the present circumstances it may not be possible. Under the AP Reorganization Act the central government has powers to arbitrate in the disputes between the two states and give directions. Part of this work is already done through a draft report submitted by CEA. TSERC may write to the Government of India to settle this issue preferably well before the Commission comes out with the tariff order for the ensuing year.</p>	
<p>8.</p>	<p><u>Why energy from IPPs not considered after PPA term?</u></p> <p>3.2.1 DISCOMs estimated power availability from GVK plant June 2015 and from Lanco December 2015 due to expiry of PPAs with these power developers. Due to this TSDISCOMs will be losing about 580 MU power. As the gas allocation to these plants continues and these plants continue to generate power TSDISCOMs shall get their share of power from these plants after the above dates also.</p> <p>3.2.2 At the same time we also would like to know the steps taken by the TSDISCOMs to extend these PPAs or take over these plants on completion of PPA terms.</p> <p>3.3 Also, in the background of additional power to the extent of 450 MW being made available to both the states combined together from gas based power plants (TS share expected to be 242 MW) following change in gas allocation policy of GoI,</p>	<p>TSDISCOMS have considered energy availability from gas based IPPS only till the PPA expiry date. Considering the low gas availability which has forced the IPPS to run at PLFs as low as 20%, Considering that long term sources are being planned in Telangana by TSGENCO and SCCL which are expected to be cheaper sources and higher cost of power generation from gas IPPs, TSDISCOMS have not considered energy availability from these stations</p> <p>TSPCC is making arrangement towards additional generation with RLNG (by way of swapping with KG D6 gas) and also with Naptha. TSPCC appraised the GoI about the power deficit that is being faced by the Telangana state and requested for allotment of 5 MMSCMD RLNG (under swapping arrangement with KG D6 gas) for additonla generation of 1000 MW. The GoI and Minsitry of Fertilisers accepted to swap 2.4 MMSCMD of gas with RLNG which will generate 450 MW approx.. out of which</p>

	<p>whereby some of the gas allocated to fertiliser plants being diverted to gas based power plants in AP, and additional power being available during summer shall be taken in to account while computing total power available to the state.</p> <p>3.4 Newspaper reports indicate that TSDISCOMs are planning to generate power from the gas based power plants using LNG/Naphtha. But the same does not appear in the present filings. DISCOMs are requested to clarify on quantum of power proposed to be generated using these fuels and its implication for cost of power procurement.</p>	<p>TSDiscoms share will be around 240 MW. Similarly TSDiscoms are making arrangements to fire Naptha as alternate fuel by issuing dispatch instructions to IPPs like Spectrum Power generation Ltd., Lanco kondapalli power ltd., and GVK industries ltd. (GVK stage-I) depending upon the grid constraints for an additional generation of 250 MW (for TSDiscoms only)</p>
10.	<p>Power purchase costs – fixed costs</p> <p>4.2.1 Draft PPAs of KTPS VI, KTPP I and KTPP II units of TSGENCO are pending before the Commission since 2009. Delay in disposing petitions related to these PPAs is one of the reasons for the prevailing confusion in allocation of plants between AP and Telangana. It is high time the Commission finalises them through public process.</p>	<p>Not in purview of discom</p>
11.	<p>4.2.2 Hinduja National Power Corporation Limited was selected in 1990s under fast track projects. PPA with it was entered in to by erstwhile APSEB in 1998. It was provided with sovereign guarantee. Along with this conditions were also laid that its cost shall be equal to NTPC's Simhadri unit II. As there was inordinate delay in setting up the project even after fuel linkage liquidated damages shall be collected form it as provided under the 1998 PPA. Reports indicate that changes are being made in this PPA. The same shall be examined through public hearings.</p>	<p>MoA was entered on 17-05-2013 by the erstwhile APDISCOMs with M/s HNPCL for entering amendments to the existing PPA in line with the Regulations and EA2003. As per the MoA , the Draft amendments are prepared by the both parties and discussed during the meetings with M/s HNPCL. The proposed amendments are sent to M/s HNPCL for their comments. After finalization of the draft amendments, same will be submitted to ERC for approval.</p>

12.	<p>Fixed costs of GENCO plants</p> <p>Capital Costs of GENCO New Plants, (Rs/U)</p> <table border="1" data-bbox="303 332 897 641"> <thead> <tr> <th>Station</th> <th>Capacity MW</th> <th>Fixed Cost</th> </tr> </thead> <tbody> <tr> <td>KTPS VI</td> <td>500</td> <td>1.79</td> </tr> <tr> <td>KTPP I</td> <td>500</td> <td>1.79</td> </tr> <tr> <td>KTPP II</td> <td>600</td> <td>2.25</td> </tr> <tr> <td>UMPP Mundra</td> <td>– 4000</td> <td>0.98</td> </tr> </tbody> </table> <p>4.2.3 Several new thermal power plants are in operation in the state. These include KTPS – VI, KTPP – I, and KTPP – II. In the above table except the last one all other plants are set up by TSGENCO. Though they are already in operation PPAs with them are not yet cleared by the Commission. They are pending before the Commission for more than four years. Even then the Commission is allowing the DISCOMs to procure power from these plants. Moreover DISCOMs in their filings are claiming that they are adopting fixed costs as approved by the Commission. According the norms/regulations in operation after the enactment of power sector reform Acts both at state and central level at the first stage PPA between the generating company and distribution licensee shall be approved by the Commission followed by financial closure. After this erection of plant and machinery starts and COD needs to be declared before the distribution licensee starts receiving power from the generating station. All these steps are skipped in the case of the new GENCO plants. Though the draft PPAs are with the Commission for more than four years the Commission could not find time examine these PPAs.</p>	Station	Capacity MW	Fixed Cost	KTPS VI	500	1.79	KTPP I	500	1.79	KTPP II	600	2.25	UMPP Mundra	– 4000	0.98	Not in purview of discom
Station	Capacity MW	Fixed Cost															
KTPS VI	500	1.79															
KTPP I	500	1.79															
KTPP II	600	2.25															
UMPP Mundra	– 4000	0.98															

13.	<p>4.2.4 Fixed costs of these new thermal power plants are high. Compared to the Ultra Mega Power Plant at Mundra in Gujarat set up by Tatas and which started power generation the fixed costs of the above plants proved to be very high. The fixed costs of these plants are higher by more than 75% to 100%.</p>	<p>UMPP from economies of scale and tax benefits tend to have a lower cost per unit. Also Fixed cost per unit changes every year with increase in O&M expenses, reduction in loan amount, reduction in interest cost. Hence, the Fixed cost of new stations coming up in Telangana & AP cannot be compared to UMPP.</p>
14.	<p>Variable/Fuel cost</p> <p>4.3.1 DISCOMs propose to adopt variable cost escalation of 2%. In case there is any change in fuel prices during the ensuing year the same may be addressed through the existing regulation or Fuel Surcharge Adjustment (FSA) may be reintroduced. There is no need to adopt the proposed variable cost escalation.</p> <p>4.3.2 Variable cost of power from Hinduja National Power Corporation Limited's plant is estimated to be Rs. 1.86 per unit. Compared to this variable cost of power from NTPC's Simhadri</p>	<p>1. It is to be noted all thermal stations run predominantly on thermal coal supplied from domestic sources like MCL, SCCL etc. while imported coal is been used only in case of domestic coal shortfall. With increase in rail freight rates for coal by 6.3% and increase in green cess to Rs. 200 per metric tonne, the cost of coal is expected to increase significantly which would increase the variable cost of production. Still, TSDISCOMS have taken a conservative estimate and projected the increase in variable cost only by 2%. TSDISCOMS request Hon'ble Commission to consider this nominal escalation</p> <p>2. Variable cost of plant depends on the coal mine from which coal is tapped, transportation charges which might include rail, road, seafreight charges. Additionally, factors like efficiency of the power plant, consumption of secondary oil, washing of coal would impact the variable cost of power production. Hence, even though the power plants are located at the same venue, it need not be necessary that the variable cost is same</p> <p>The Variable Cost of Simhadri STPS is considerably high when compared to the Variable Cost of HNPCL as 40 % of required Coal is being imported for the Simhadri STPS.</p> <p>The NTPC is using 60 % of indigenous Coal and 40% of imported Coal for the Simhadri Super Thermal Power Station in view of the shortage</p>

	<p>units is estimated to be Rs. 2.60 per unit. While source of fuel (coal) for both the plants is the same (Mahanadi Coal Fields) NTPC's units' variable cost is higher by nearly 40%. This needs to be looked in to.</p> <p>4.3.3 Variable cost of KTPS VI unit (Rs.2.73 per unit) is higher than other units located at Kothagudem. This is because of allocation of coal from Mahanadi Coal Fields rather than from Singareni units. As swapping/rationalisation of coal allocation is in operation KTPS VI unit shall also get its fuel from Singareni units. This will help to bring down cost of power from this unit.</p>	<p>of indigenous Coal.</p> <p>The HNPCL has yet to start generation and Variable Cost arrived by HNPCL is based on 100 % of indigenous Coal</p> <p>Originally KTPS-Vi stage is totally linked to Ms Mahanadi coal fields Ltd. To an extent of 2.31 million tonnes per annum. Ministry of Coal, GoI has swapped the coal linkage from MCL to SCCL. Fuel supply agreement will be entered with the SCCL for supply of Coal to this unit.</p>
15.	<p>4.3.4 Use of imported coal continues to be source of concern, both in terms of price as well as quality. Following objections raised by the public during public hearings the Commission has given several directions in the case of utilisation of imported coal by central generating stations as well as APGENCO units. TSDISCOMs in their replies in response to these directions merely mentioned that TSGENCO plants would not be using imported coal. Under the provisions of the AP Reorganization Act TSDISCOMs also will be accessing power from CGS and APGENCO thermal units which are using imported coal. In this regard TSDICOMs also need to pay attentions to the directives</p>	<p>TSDISCOMS would adhere to the directives issued by the Hon'ble Commission</p>

	issued by the Commission related to utilisation of imported coal.																
16.	<p>4.3.6 One of the important reasons for increase in power purchase costs is hike in natural gas price by the central government. Price of natural gas increased from \$ 4.2 per MBTU to \$ 5.61 per MBTU. Following this variable cost of power produced from gas based power plants increased.</p> <p>Variable Cost Rs/U</p> <table border="1"> <thead> <tr> <th>Plant</th> <th>2013-14</th> <th>2015-16</th> </tr> </thead> <tbody> <tr> <td>GVK</td> <td>2.19</td> <td>2.62</td> </tr> <tr> <td>Spectrum</td> <td>2.48</td> <td>2.76</td> </tr> <tr> <td>Lanco</td> <td>2.25</td> <td>3.02</td> </tr> <tr> <td>Reliance</td> <td>1.64</td> <td>3.44</td> </tr> </tbody> </table>	Plant	2013-14	2015-16	GVK	2.19	2.62	Spectrum	2.48	2.76	Lanco	2.25	3.02	Reliance	1.64	3.44	Noted
Plant	2013-14	2015-16															
GVK	2.19	2.62															
Spectrum	2.48	2.76															
Lanco	2.25	3.02															
Reliance	1.64	3.44															
17.	<p>4.3.7 The new natural gas price adopted by the GoI goes against the norms of price fixation, against the PSC and also orders of the Supreme Court. This shall not be allowed. As the consumers of Andhra Pradesh will be severely adversely affected by this APDISCOMs and GoAP should have taken initiative to see that this price is rolled back. These should have explored all avenues to bring down this price, including approaching the Supreme Court. As variable costs are pass through APDISCOMs are least bothered about this burden on the consumers. In the meantime E.A.S Sarma, former Secretary, GoI and Gurudas Dasgupta filed a petition in Supreme Court challenging the above gas price. We request the TSDISCOMs and the GoTS to implead in this case before the Supreme Court. This request is</p>	Noted															

	not a misguided one given the APERC's observations in its Order on GVK that DISCOMs will take care of consumers' interests.	
18.	<p><u>How short term purchases are made without regulatory approval?</u></p> <p>4.4 During the FY 2014-15 TSDISCOMs procured 8,713 MU through short term/market purchases constituting nearly 18% of the power procured in the state. Most of this power is procured without regulatory approval and in a non-transparent manner. Even when additional demand was only during peak period power through short term purchases was procured under round the clock (RTC) terms. Because of this during non-peak periods in order to accommodate short term purchases made under RTC terms cheaper GENCO plants were being backed down. This led to unnecessary burden on TSDISCOMs and in turn on consumers in the state. TSDISCOMs as the filings show will be procuring power through short term purchases during 2015-16. Also, state leadership is exhorting DISCOM officials to procure power at any cost. Keeping past experience in mind short term purchases shall be made in an optimum manner, specifically to meet peak deficits, but not on RTC terms.</p>	During FY 14-15, energy requirement has been significantly higher than the energy availability. Also due to a bad monsoon year, Hydel energy availability has significantly reduced. To fulfil the promise of providing 7 hours of supply to Agriculture consumers, TSDISCOMS had to resort to power purchase from Short term sources.
19.	<p>5.1 Financial Restructuring Plan (FRP) is introduced by the GoI in the name of ensuring the financial viability of the DISCOMs. Though introduced by it the GoI does not take any financial responsibility of ensuring the financial viability of the DISCOMs. According to this Plan the state government will stand guarantee to the bonds issued to cover 50% of the accumulated losses. From DISCOMs' filing it is not clear whether the State Government will repay the bonds or</p>	<p>The State Govt is required to take over 50 % of the outstanding short term liabilities (STL) corresponding to the accumulated loss as per audited accounts of the DISCOMs as of March 2013 , the cutoff date for implementation of FRP in combined State .</p> <p>Initially Bonds are issued by the DISCOMs and GoTS will take over the bonds in two to five years depending upon its fiscal space.</p> <p>DISCOMs are taking up the issue of taking over the bonds by GoTS.</p> <p>Interest and repayments of bonds is the liability of GoTS. Further, GoTS has already paid Rs227 Crs interest on bonds relating to first half of</p>

	<p>DISCOMs have to pay them and in case of their default only the State Government will come in to the picture. Apart from this, the bonds issued by the state government covers only 40% of the accumulated losses, not 50%as envisaged in the Plan.</p>	<p>FY2014-15.</p>
<p>20.</p>	<p>5.2 According to the TSDISCOMs' filings the remaining 60% losses need to be structured as loans with a three moratorium for paying principal amount. The two DISCOMs propose to convert losses to the extent of Rs. 2,450 crore in to short term loans, constituting only 40% of their burden. Then, what will happen to the remaining 60% of their loss burden?</p>	<p>The details of losses and contribution of each components is already enclosed in the Director's Report of the company Annual accounts 2012-13 which is again reproduced below <i>"During the Financial Year 2012-13, Company has incurred a Business Loss of Rs. 7718.29 Crores which include operational loss of Rs.2078.04 crores. The operational loss is due to increased power purchase costs. And the GoAP has not subsidized in total the Expensive Power purchases and the interest paid for Rs. 790.13 Crores on Short Term Loan drawn for purchase of Expensive Power during the Financial Year 2012-13 which also resulted in loss for the current financial year 2012-13. Apart from the above the Company had written off unapproved Fuel Surcharge Adjustment [FSA] by Honourable APERC for FY 2009-10 to 2011-12 amounting to Rs. 948.17 Crores. During the year the Company had also made provisions towards unbilled and uncollected FSA of Rs. 637.81 Crores for the period 2009-10 to 2010-11 (1st Quarter) due to stay on FSA billing and collections as per the Orders of Honourable High Court, and Government receivables to the extent of Rs. 181.23 crores which are due towards Single Bulb subsidy, Tatkal Subsidy and Subsidy receivable from Government in support of Third Transfer Scheme in respect of taking over of REC Loan and Vidyut bonds. The Government receivables towards addition power subsidy of Rs. 3877.87 Crores have been provided as doubtful. The above provisions have been made due to non commitment by GoAP, non receipt of subsidy from GOAP and there being no provision in budgetary support for Government subsidy towards additional power during F.Y.2013-14. The Company had also made provision for Rs. 82.13 Crores towards the RESCOs absorption of Assets and Liabilities and Certain Fixed Assets of RESCOs have been written as their net book value is unrecognized. The above provisions were</i></p>

		<p><i>made as there was no commitment received from the Government, regarding these receivables. All the above factors have resulted in the net accumulated losses of Rs. 7829.81 crores. Because of the increased accumulated losses the net worth of Company as on 31.03.2013 is showing a negative balances of Rs. 5315.83 crores. The losses are recoverable through true-up mechanism in Tariffs of ensuing years, and the Financial Restructuring package to be implemented by Government of Andhra Pradesh.”</i></p> <p>DISCOMs have raised STL to meet expensive power purchase cost, increase in power purchase cost due to inflation and cost associated delayed collection of FSA etc. The GoAP/GoTS had agreed to take over their commitment towards expensive power purchase. Accordingly, 50% of STL will be taken over by GoTS as per scheme and balance 50% of STL is due to the</p> <ol style="list-style-type: none"> 1) Restriction of T&D losses to the extent of approved losses while approving FSA , 2) Restriction of agriculture consumption to the extent of approved quantity in the T.O in the FSA orders Eventually led to Difference of FSA between filed and approved by the Hon'ble APERC for the FY 2011 to 2013. <p>The scheme basically meant to make DISCOMs financially viable and to restructured the short term loans and GOI proposed that, the 50% of STL shall be issued in the form of bonds to Banks. The bonds will be repaid by GoTS along with interest.</p> <p>The scheme proposes to restructure the balance of Short terms Loans to the extent of 50% of Short term loans outstanding as on 31-03-2013. The interest and repayment of restructured loans will be the commitments of DISCOMs.</p>
--	--	--

<p>21.</p>	<p>5.3 TSDICOMs submitted, “The key components of above losses are unapproved portion of Fuel Surcharge Adjustment (FSA) for the years 2009-10 to 2011-12, FSA cases pending in courts and Govt receivables over and above Rs. 4,553.85 Crs which is agreed by Govt as final settlement”. Apart from the DISCOMs did not provide any details on the sources of these accumulated losses. Unapproved FSA amounts cannot be recovered without sanction from the TSERC and the Courts in question. Again in the case of TSERC, it cannot approve the pending FSAs without following the public process as mandated by the High Court in earlier cases. The above passage also mentions Govt receivables. From this it is not clear whether these are receivable by Govt from DISCOMs or by DISCOMs from Govt. In fact it should be receivables by DISCOMs from Govt. In the past the state government directed the DISCOMs to purchase power from market at high prices assuring that it will bear higher the expenditure. The DISCOMS also mentioned,” The bonds issued cover the expensive power purchased by the TS DISCOMs for the period 2008-09 to 2013-14.” (p.50 SPDCL Filing) After that it reneged on its assurance. According to the MYT framework surplus/deficit need to be analysed at the end of the control period in detail before approving the same. But it was not done in the case of first as well as second control periods. In the background of the above we request the Commission not to approve the above interest cost and direct the DISCOMs to make all information related to the above public.</p>	<p>a) The details of losses and contribution of each components is already enclosed in the Director’s Report of the company Annual accounts 2012-13 which is again reproduced below <i>“During the Financial Year 2012-13, Company has incurred a Business Loss of Rs. 7718.29 Crores which include operational loss of Rs.2078.04 crores. The operational loss is due to increased power purchase costs. And the GoAP has not subsidized in total the Expensive Power purchases and the interest paid for Rs. 790.13 Crores on Short Term Loan drawn for purchase of Expensive Power during the Financial Year 2012-13 which also resulted in loss for the current financial year 2012-13. Apart from the above the Company had written off unapproved Fuel Surcharge Adjustment [FSA] by Honourable APERC for FY 2009-10 to 2011-12 amounting to Rs. 948.17 Crores. During the year the Company had also made provisions towards unbilled and uncollected FSA of Rs. 637.81 Crores for the period 2009-10 to 2010-11 (1st Quarter) due to stay on FSA billing and collections as per the Orders of Honourable High Court, and Government receivables to the extent of Rs. 181.23 crores which are due towards Single Bulb subsidy, Tatkal Subsidy and Subsidy receivable from Government in support of Third Transfer Scheme in respect of taking over of REC Loan and Vidyut bonds. The Government receivables towards addition power subsidy of Rs. 3877.87 Crores have been provided as doubtful. The above provisions have been made due to non commitment by GoAP, non receipt of subsidy from GOAP and there being no provision in budgetary support for Government subsidy towards additional power during F.Y.2013-14. The Company had also made provision for Rs. 82.13 Crores towards the RESCOs absorption of Assets and Liabilities and Certain Fixed Assets of RESCOs have been written as their net book value is unrecognized. The above provisions were made as there was no commitment received from the Government, regarding these receivables. All the above factors have resulted in the net accumulated losses of Rs. 7829.81 crores. Because of the increased accumulated losses the net worth of Company as on 31.03.2013 is showing a negative balances of Rs. 5315.83 crores. The losses are recoverable through true-up mechanism in Tariffs of ensuing years, and the Financial</i></p>
------------	---	--

		<p><i>Restructuring package to be implemented by Government of Andhra Pradesh.”</i></p> <p>2) Since, the discoms are claiming the interest on STL restructured loans which is the part of FRP scheme, the restructured loan is the liability of DISCOMs as per scheme and the DISCOMs can only pay the debt service on the restructure loans through ARR .There is no additional resources to meet the debt servicing cost of DISCOMS.</p> <p>DISCOMs are only claiming interest and will claim the repayments of EMI from the beginning of 4th year of FRP implementation. The soft copy of FRP scheme approved by the GoAP can be shared with hon’ble objectors as desired by them.</p>										
22.	<p>6.1 TSDISCOMs claim Rs. 1,463.30 crore under true up for the FY 2013-14 and 2014-15. But they do not provide any justification for the same. Even whatever information provided by them is confusing. TSSPDCL in its filing (pp.50-51) mentioned revenue of Rs. 13,295 crore for the year 2013-14 and supply cost of Rs. 11,865 crore, but mentioned the difference between the two (true down) as Rs. 161.74 crore.</p>	<p>In the flings the supply cost of Rs. 11865 crores is the retail supply cost. But to arrive at the Retail supply gap alone, the revenue from the distribution business consumers has to be considered as the same as the Tariff order value. Hence the Gap of Rs. 161.74 crores arrived for TSSPDCL after netting of the approved distribution cost.</p> <p style="text-align: center;">Rs in cr</p> <table border="1"> <tr> <td>Supply cost</td> <td>11865</td> </tr> <tr> <td>Revenue</td> <td>13295</td> </tr> <tr> <td>Gap</td> <td>-1430</td> </tr> <tr> <td>Distribution cost</td> <td>1269</td> </tr> <tr> <td>Net gap</td> <td>-161</td> </tr> </table>	Supply cost	11865	Revenue	13295	Gap	-1430	Distribution cost	1269	Net gap	-161
Supply cost	11865											
Revenue	13295											
Gap	-1430											
Distribution cost	1269											
Net gap	-161											
23.	<p>6.2 One of the important reasons for this revenue gap is higher fuel costs. According to a recent report of CAG (see Annexure I) Reliance Industries Ltd received higher price than allowed. According to this report, "As per the price discovery</p>	Noted										

	<p>process undertaken by the operator (RIL)... it was categorically indicated that selling price would be rounded off to two decimal points... A review of records relating to sales of gas to consumers, however, revealed that the operator has been charging the gas price at the rate of \$4.205 per unit (three decimal points) from its consumers in place of USD 4.20 per mmBtu, arrived at after rounding of 2 decimal points". The draft of the second audit of the field's books, submitted by the Comptroller and Auditor General to the oil ministry for comments, says Reliance was charging consumers by rounding off the price in three decimal units against the norm of two decimal units, leading to excess billing of \$9.68 million in the first four years of production beginning 2009-10. TSDISCOMs shall be directed to recover the excess amount paid and to that extent true up amount shall be brought down.</p>	
24.	<p>6.3 According to newspaper reports (See Annexure II) the Directorate of Revenue Intelligence has unearthed a scam involving companies inflating the value of coal imports from Indonesia for their power plants. Initial estimates by the agency pegged the overvaluation at Rs 29,000 crore in the period 2011-2014. DRI has raided over 80 shipping companies, intermediaries and laboratories across the country including, Andhra Pradesh in search of documents that show the real value of the imports. Almost all laboratories testing coal in India have been searched by the DRI to obtain the lab reports for verification of the calorific value of the imported coal. According to this investigation almost every importer, including the reputed corporate – public and private, have indulged in</p>	Noted

	<p>overvaluation of coal imports. DRI is learnt to have recovered documents showing the real value of the imports. The overvaluation has an impact on the tariff paid by consumers here as power companies could have a higher tariff fixation based on the inflated rates. It was estimated that the power tariff would be less by Re 1 per unit if the value of imported coal value was not inflated. In the past during public hearings objectors have pointed out many anomalies in imported coal including higher prices. As this is upheld by the investigation of DRI we request the Commission not to allow the true up demanded by DISCOMs to the extent of over valuation of imported coal.</p>																	
25.	<p>Estimation of agriculture consumption (MU)</p> <table border="1" data-bbox="303 797 1002 1060"> <thead> <tr> <th></th> <th>2013-14</th> <th>2014-15</th> <th>2015-16</th> </tr> </thead> <tbody> <tr> <td>NPDCL</td> <td>4348</td> <td>4715</td> <td>4904</td> </tr> <tr> <td>SPDCL</td> <td>6694</td> <td>7238</td> <td>7528</td> </tr> <tr> <td>Total</td> <td>11042</td> <td>11953</td> <td>12432</td> </tr> </tbody> </table> <p>7.1 Filings of NPDCL as well as SPDCL show that power consumption in the agriculture sector in Telangana is increasing irrespective of the situation on the ground. The above consumption figures are arrived at by the DISCOMs on the basis of their claim that they are supplying power for 7 hours per day (p.64, SPDCL). This is far from truth. Most of the time, farmers are not receiving not even four hours of supply in a day. As such the Commission shall not take the above consumption figures in to account.</p>		2013-14	2014-15	2015-16	NPDCL	4348	4715	4904	SPDCL	6694	7238	7528	Total	11042	11953	12432	<p>During the year 2014-15 the discoms have supplied 3 phase agl supply to the farmers 6 to 7 hours per day based on the availability of power. Hence the projection for the yr 2015-16 is made taking in to the consideration of extending seven hours three phase supply to the farmers.</p>
	2013-14	2014-15	2015-16															
NPDCL	4348	4715	4904															
SPDCL	6694	7238	7528															
Total	11042	11953	12432															

26.	<p>7.2 The fact that the agriculture consumption figures provided by the DISCOMs are anomalous comes out from their filings. According to their filings while 9,78,028 pump sets under SPDCL will be consuming 7,528 MU during 2015-16, under NPDCL 10,73,870 pump sets will be consuming 4,904 MU. In other words per pump set consumption will be 7,528 units under SPDCL, it will be 4,567 units in the case of NPDCL. Per pump set consumption in SPDCL will be nearly 70% higher compared to NPDCL, even while hours of supply of electricity are the same under both DISCOMs.</p>	<p>The agl consumption is assessed based on the ISI methodology approved by Hon commission. The agl consumption may vary from District to District based on the drought conditions in the respective districts.</p>																					
27.	<p><u>Agriculture consumption during 2013-14</u></p> <table border="1" data-bbox="306 656 1131 1401"> <thead> <tr> <th>Particulars</th> <th>NPDCL</th> <th>SPDCL</th> </tr> </thead> <tbody> <tr> <td>Pump sets with DSM</td> <td>9,75,729</td> <td>10,93,743</td> </tr> <tr> <td>Pump sets without DSM</td> <td>3,086</td> <td>5,275</td> </tr> <tr> <td>Energy consumed by Pump sets with DSM (MU)</td> <td>4,355.6</td> <td>9157.93</td> </tr> <tr> <td>Energy consumed by Pump sets without DSM (MU)</td> <td>5.77</td> <td>32.19</td> </tr> <tr> <td>Average consumption of Pump sets with DSM (U)</td> <td>4,464</td> <td>8373</td> </tr> <tr> <td>Average consumption of Pump sets without DSM (U)</td> <td>1,870</td> <td>6102</td> </tr> </tbody> </table>	Particulars	NPDCL	SPDCL	Pump sets with DSM	9,75,729	10,93,743	Pump sets without DSM	3,086	5,275	Energy consumed by Pump sets with DSM (MU)	4,355.6	9157.93	Energy consumed by Pump sets without DSM (MU)	5.77	32.19	Average consumption of Pump sets with DSM (U)	4,464	8373	Average consumption of Pump sets without DSM (U)	1,870	6102	<p>The average consumption per pump set will depend on capacity of the pump set with & without DSM measures.</p>
Particulars	NPDCL	SPDCL																					
Pump sets with DSM	9,75,729	10,93,743																					
Pump sets without DSM	3,086	5,275																					
Energy consumed by Pump sets with DSM (MU)	4,355.6	9157.93																					
Energy consumed by Pump sets without DSM (MU)	5.77	32.19																					
Average consumption of Pump sets with DSM (U)	4,464	8373																					
Average consumption of Pump sets without DSM (U)	1,870	6102																					

	<p>7.3 According to the above table 99% of the farmers with pump sets in Telangana have adopted DSM measures. The electricity consumption figures provided for pump sets with and without DSM measures also gives rise to doubts about the way agriculture consumption figures are provided. On the average pump sets with DSM measures consumed more power than the pump sets without DSM measures. In the case of NPDCL average consumption of pump sets with DSM measures was 4,464 units in an year compared to 1,870 units by pump sets without DSM measures. In the case of SPDCL average consumption of pump sets with DSM measures was 8,373 units in an year compared to 6,102 units by pump sets without DSM measures. This totally goes against the prevailing understanding on DSM measures as well as report on a pilot reported by TSSPDCL. DISCOMs are requested to clarify.</p>	
28.	<p>7.4 Subsidy towards free power to agricultural services is being provided on the basis of 7 hours of power supply to these services. But in reality farmers are getting power for less than five hours. This implies that DISCOMs were compensated more than necessary to supply free power to agriculture. The excess subsidy paid to DISCOMs in this regard shall be recovered.</p>	<p>The Hon commission approved sales for agriculture for the FY 2013-14 is 8073.7 mu. As against this the actual agl sale as per ISI methodology approved by Hon commission is 9190.49 mu. The power purchase cost for agricultural supply is more than the ERC approved. Hence the discom has not received any excess subsidy from the govt.</p>
29.	<p>7.5 In the absence of metering of agricultural connections DISCOMs claimed that they have arrived at these figures following the ISI methodology suggested by the Commission. But data collected under this methodology is also not complete. To overcome this we suggest that all DTRs serving the agriculture services should be metered so that the consumption estimates are realistic. The Task Force on electricity Sector appointed by the Government of Telangana State also suggested metering of DTRs serving agriculture loads.</p>	<p>Indian Statistical Institute (ISI) presented a new methodology for assessing agricultural consumption. The methodology picked up (2245 Nos.) samples from the population of Agl. DTRs for TSSPDCL (for six circles i.e. Mahabubnagar, Nalgonda, Medak, RR East, RR North & RR South). The sample is dynamic. (i.e.) over a period of six months, locations for 10% of the sample DTRs in each circle are to be changed, for effective implementation. As directed by the Regulatory Commission, meters were installed for 10% of sample size (i.e. 225 Nos.) in addition, so as to increase the number of valid DTRs to be considered for assessment of</p>

		<p>consumption. Since the metering is done on the LV side of the agricultural DTRs, the assessed consumption as per the procedure includes the consumption of unauthorized agricultural services also. The assessment of agricultural consumption as per the ISI methodology is done every month and is filed with the Hon'ble TSERC.</p> <p>It is difficult to meter all the DTRs serving to agricultural connections. The agricultural DTR meters are exposed to atmosphere hence more chances to damage of meters. This results in is loss of revenue and not practical.</p> <p>However the methodology now being followed is scientific and approved by Hon'ble TSERC.</p>		
30.	<p>7.6 In the past the Commission (Fresh Directive No. 2 of the Tariff Order for FY 2011-12) directed the DISCOMs to furnish meter-wise readings noted and transformer-wise, feeder-wise consumptions measured on all the DTRs and Feeders covered under HVDS scheme. But the DISCOMs are not paying heed to this direction. Information provided through these readings would have thrown much light on electricity consumption in agriculture sector as well as efficacy of HVDS scheme. We request the Commission to direct the DISCOMs once again to furnish the above information at the earliest.</p>	<p>In TSSPDCL earlier CPDCL there was no provision for erection of meters under HVDS schemes phase I,II &III covered under REC funding. Meters are being erected to the DTRs under JICA HVDS scheme. Once the DTRs are charged under JICA scheme, the feeder wise consumption will be measured.</p>		
31.	<p>Deaths due to shocks 7.7.1 Every year hundreds of farmers are meeting death due to electrical shocks. This is highly avoidable. 7.7.2 During 2013-14 in Telangana 436 people died due to electrical shocks. More than 50% of these cases under SPDCL took place in the circles/districts of Mahabubnagar and Nalgonda. Similar is the case in the first half of 2014-15. Further these figures are an under estimate of the reality.</p>	<p>Every effort is being made to avoid accidents, by taking up regular maintenance works like replacement of conductor, providing of inter poles , maintains of DTRs structure and LT lines, providing of earthing. Wide publicity being given requesting Ryots not to meddle with Distribution Transformers.</p> <table border="1" data-bbox="1346 1370 1795 1408"> <tr> <td data-bbox="1346 1370 1607 1408">Accidents</td> <td data-bbox="1607 1370 1795 1408">Accidents</td> </tr> </table>	Accidents	Accidents
Accidents	Accidents			

<p>Farmers are the main victims of this phenomenon.</p> <p>Table: Deaths Due to Electric Shocks</p> <table border="1" data-bbox="306 266 908 808"> <thead> <tr> <th></th> <th>2013-14</th> <th>First Half of 2014-15</th> </tr> </thead> <tbody> <tr> <td>NPDCL</td> <td>185</td> <td>87</td> </tr> <tr> <td>Mahabubnagar</td> <td>115</td> <td>69</td> </tr> <tr> <td>Nalgonda</td> <td>84</td> <td>25</td> </tr> <tr> <td>SPDCL</td> <td>251</td> <td>129</td> </tr> <tr> <td>Total Telangana</td> <td>436</td> <td>216</td> </tr> </tbody> </table>		2013-14	First Half of 2014-15	NPDCL	185	87	Mahabubnagar	115	69	Nalgonda	84	25	SPDCL	251	129	Total Telangana	436	216	<table border="1" data-bbox="1346 191 1795 418"> <thead> <tr> <th>occurred during 2013-14</th> <th>occurred during 2014-15 jan 15</th> </tr> </thead> <tbody> <tr> <td>331</td> <td>259</td> </tr> </tbody> </table> <p>However all require measures are taken avoid accidents.</p> <p>The process to the pay the compensation will be examined for simplification as suggested. Balance cases pending for want of various documents such as FIR, postmortem, legal heir etc.</p> <p>Presently Rs.2 Lacks compensation is being paid to non-departmental fatal accident.</p>	occurred during 2013-14	occurred during 2014-15 jan 15	331	259
	2013-14	First Half of 2014-15																					
NPDCL	185	87																					
Mahabubnagar	115	69																					
Nalgonda	84	25																					
SPDCL	251	129																					
Total Telangana	436	216																					
occurred during 2013-14	occurred during 2014-15 jan 15																						
331	259																						
<p>7.7.3 The DISCOMs did not provide complete details of these incidents like for how many cases DISCOMs took responsibility and in how many cases compensation was paid and amount paid towards compensation. NPDCL mentioned that compensation was paid in 56 cases out of 185 deaths in 2013-14 and in 11 cases out of 87 deaths during the first half of 2014-15. Procedures need to be simplified to see that all victims receive compensation at the earliest</p>	<p>In 2013-14 out of 331 accidents compensation Paid for 29 cases In 2014-15 out of 259 accidents compensation Paid for 12 cases The process to the pay the compensation will be examined for simplification as suggested. Balance cases pending for want of various documents such as FIR, postmortem, legal heir etc.</p>																						
<p>7.7.4 Even in the electrocution deaths that the DISCOMs had taken responsibility the amount paid (about Rs. 1 lakh per person) is very meagre. Even this meagre amount was not paid properly. There is need to revise the compensation upwards like in the case of railways.</p>	<p>Presently Rs.2 Lacks compensation is being paid to non-departmental fatal accident.</p>																						

32.	<p>7.7.5 There shall also be separate mechanism to pin responsibility for deaths due to electricity shocks. In the present case perpetrator it self is the judge. To avoid this anomaly a committee comprising different stakeholders shall go into these deaths and pronounce whether DISCOMs are responsible for these tragedies or not.</p>	<p>Within 24 hours preliminary report and then detailed report is being furnished by ADE. As per Government of Telangana instructions the Chief Electrical Inspector to Government is being reported about the electrical accident. Then jurisdictional Deputy Electrical Inspector will investigate the electrical accident.</p>
33.	<p>7.7.6 More than this these deaths are highly avoidable. These deaths are taking place due to neglect of rural network by the DISCOMs. Every year the Commission allowed Rs. 5 crore to be spent by the DISCOMs on safety measures to avoid such deaths. But DISCOMs did not care to utilise them. NPDCL spent Rs. 34.25 lakh during 2013-14 and Rs. 12.29 crore during first half of 2014-15. If the safety of DTRs were improved many of these deaths could have been avoided.</p>	<p>During the financial year 2013-14 Rs. 35 crores expenditure incurred towards Renovation & Modernisation Works and Reliability Improvement and Contingency Works for network strengthening. Out of that expenditure in rural is Rs. 27 crores and urban Rs. 17 crores.</p> <p>All efforts are being made to maintain good quality electrical network. As per field requirement depending on the work load, the required field staff is deplored.</p> <p>In lieu of vacancies temporary arrangement made with outsourcing staff.</p>
	<p>7.7.7 In most of these cases it was the farmers who met this tragic end. These deaths could have been avoided if there were timely and sufficient technical support at the ground level and good quality electrical network. Most of the technical posts like linemen in rural areas are vacant and farmers are forced to attend to repair work on their own with fatal consequences. Thousands of line men posts are lying vacant since a long time. Recently Telangana State Government announced that hundreds of electrical engineers will be recruited shortly. But there is no word about recruiting line men. Filling line men posts not only bring down deaths due to shocks but also help to bring down T&D losses and their by add to the income of the DISCOMs.</p>	<p>All efforts are being made to maintain good quality electrical network. As per field requirement depending on the work load, the required field staff is deployed.</p> <p>In lieu of vacancies temporary arrangement made with outsourcing staff. Further the recruitment will be taken up after final allocation of employees.</p>

34.	<p>Quality of Power 7.8.1 Electricity received by the farmers was of uneven quality with unpredictable interruptions. Power supply timings announced by the Licensees are not being adhered to. It is the responsibility of the Commission under Section 86 (1) (i) of the Electricity Act, 2003 to enforce standards with respect to quality, continuity and reliability of service by licensees.</p>	<p>The supply to Agriculture sector provided into two spells every day. All the efforts are made to provide supply in a fixed and stipulated timing without deviation. In case of emergencies, if any emergency load reliefs are implemented in the schedule time of supply and the same is being compensated on the same day.</p>
	<p>7.8.2 In the past DISCOMs used to post feeder-wise electricity supply details on their websites. But they stopped this practice suddenly some time back. We request the Commission to direct the DISCOMs to post all relevant information on quantum and quality of supply on their websites.</p>	<p>The feeder wise electricity supply details can be posted in the web site after completing the AMR for agl feeders under DDUGJY scheme.</p>
35.	<p>DTR failure/repair 7.8.4 DISCOMs are also not attending to maintenance of DTRs properly. Farmers are being forced to incur expenditure in transporting the DTRs. DTRs are also not being repaired in time. DISCOM staff are also collecting money from farmers to repair DTRs. They are not attending to repairs until the farmers pay up. In Kanugutta village of Both mandal in Adilabad district it took 10 days to repair the DTR. In Madaka village of Odelu mandal in Karimnagar district it took more than one week to repair the transformer while under Standards of Performance DTRs in rural areas shall be repaired within 48 hours.</p>	<p>Instructions were issued to all the Superintending Engineers/ Operation for restoring power supply in case of all the failed Distribution Transformers (DTRs) [irrespective whether they are sick or failed or burnt or stolen; agricultural DTRs or non-agricultural DTRs] by replacement within 48 hours of receiving the complaint in Rural areas. TSSPDCL is maintaining sufficient quantity of healthy rolling stock of DTRs at all its SPM centers to facilitate timely replacement of the failed DTRs.</p>
36.	<p>7.8.5 Low quality of power in rural areas is also because of crumbling transmission and distribution network in rural areas. Decades old conductors are hanging low endangering lives as</p>	<p>During the financial year 2013-14 Rs. 35 crores expenditure incurred towards Renovation & Modernisation Works and Reliability Improvement and Contingency Works for network strengthening. Out of that expenditure in rural is Rs. 17.23 crores and urban Rs. 17.77 crores.</p>

	<p>well as resulting high transmission losses. Many of the DTRs are more than decade old and should have been replaced. Added to this many of these DTRs do not have even AB switches. Depreciated and old parts of T&D network shall be replaced in keeping with prudent maintenance of the network in good health.</p>	<p>Further old and deteriorated transformers are survey reported and replenished regularly.</p>
37.	<p>DSM Measures 7.9.1 To be eligible for free power, farmers have to undertake demand side management (DSM) measures i.e., installation of capacitors, ISI marked pump sets, HDPE or RPVC piping and frictionless foot-valve. These measures are proposed to bring down quantum electricity consumption in the agriculture sector there by reducing financial burden both on the state government and farmers. Farmers also would like to contribute to this endeavour. Though farmers are interested in taking them up they are facing hurdles in implementing them. 7.9.2 DISCOM officials are claiming that more than 90% of the farmers have installed capacitors. But truth is that not even 10% of the farmers installed capacitors. Farmers do not have technical assistance in the form of access to linemen or assistant linemen, to take this up. thousands of line men posts in rural areas are lying vacant. Even where linemen or assistant linemen are available they do not have proper knowledge in installation of capacitors. Installation of capacitors at a wrong point led to burning of pump sets, which scared other farmers from doing the same.</p>	<p>As per the Hon'ble APERC Tariff Orders the Agricultural Service with DSM measures only are eligible for free power. Accordingly, the services to the Agricultural Pump Sets are being released with DSM Measures which includes capacitors of adequate rating. Out of 8,93,397 Agricultural pump sets 7,22,797 are provided with the capacitors and wide publicity was given for implementation of DSM measures and educating the consumers at field</p>

38.	<p>7.9.3 A pilot implemented by SPDCL (p.88) power consumption declined by nearly 10% after installation of capacitors. This implies that by spending Rs. 60 crore to install capacitors at 20 lakh pump sets in Telangana DISCOMs will be able to save about Rs. 500 crore. This alone shall spur the DISCOMs to implement capacitor programme on war footing.</p>	<p>As per the Hon'ble APERC Tariff Orders the Agricultural Service with DSM measures only are eligible for free power. Accordingly, the services to the Agricultural Pump Sets are being released with DSM Measures which includes capacitors of adequate rafting. Out of 8,93,397 Agricultural pump sets 7,22,797 are provided with the capacitors and wide publicity was given for implementation of DSM measures and educating the consumers at field 836 Numbers of 2MVAR Capacitor Banks at 33/11Kv sub station are installed and inservice. Further 216 Nos Capacitor banks will be commissioned within a year</p>
39.	<p>7.9.4 Use of ISI standard pump set is another important DSM measure. Present pump set efficiency in the State is only 25% and this could be increased to 50% by using ISI standard motors. For proper operation of ISI standard pump sets minimum voltages are required. Under prevailing low voltages in the state these ISI motors do not work. Because of this low voltage, farmers are forced to go in for locally made pump sets which operate even under low voltages. One of the reasons for low voltage is overloading of distribution transformers (DTR) installed for agricultural purposes. This overload is to the extent of 25 to 50%. If this overload problem is addressed successfully farmers can think of using ISI standard motors. This can be addressed by increasing the number of DTRs of adequate capacity in the agriculture sector. We request the state government and DISCOMs to install additional DTRs to solve low voltage problem so that farmers will be emboldened to go in for ISI standard motors.</p>	<p>In order to eradicate low voltage problem & release of new agl connections 12969 Distribution Transformers are erected during 2014-15.</p>

40.	<p>7.9.5 Though the farmers may be willing to install ISI standard motors in the event of voltages improving the financial burden on them will be onerous and it will be good to explore the ways of minimizing burden on them in replacing the non-standard motors with ISI standards motors. In Tamil Nadu, the State government and utilities are said to have taken up a programme where a third party – Electricity Service Company (ESC) – takes the responsibility of replacing the motors and is given a share in the savings of electricity consequent to installation of standard motors. We request the State government to explore this option also as it will not burden the state government as well as the farmers.</p>	<p>The modalities of Tamil Nadu will be studied and detailed report will be submitted to the Government for policy decision.</p>
41.	<p>7.10.1 Since 2005 HVDS programme is taken up in the state as a solution to the low voltage problem. Until now thousands of crores of rupees were spent on this but not even 10% of the pump sets were covered. A HVDS transformer is five times costlier than the regular DTRs being used at present. It was felt that if the same amount was spent on adding regular DTRs by this time the low voltage problem would have been solved. Even if the present additional load on existing DTRs is assumed as 50% then the estimated expenditure would be 50% of the cost of the existing DTRs. If we want to replace all the DTRs with HVDS DTRs the expenditure would be five times. The question is why spend 550% more when we could achieve with 50% only. We may be wrong in these calculations. Farming community in the state does not have any information on or insight in to this HVDS programme. Farming community in the state should have been taken in to confidence while formulating</p>	<p>The small capacity DTRs are being erected for release of new agl services in TSSPDCL. In HVDS scheme also, the existing 63/100 KVA are replaced with small capacity transformers. There is no cost difference in small capacity transformers being used in the above two scheme as there is no difference in the specifications. Hence there is no additional expenditure incurred on account of DTR cost.</p>

	<p>solution to low voltage in rural areas. This is not too late. We request the state government as well as the DISCOMs to place all the information related to HVDS before the public including farmers for an informed discussion on the problems being faced by both the DISCOMs and farmers in the state that will lead to a solution that is beneficial to all stakeholders.</p>													
42.	<p>7.10.2 Over the last few years hundreds of crores were spent on implementing HVDS for agriculture pump-sets. The present filings also show that DISCOMs plan to spend more money on this. Before taking this programme forward there should have been a thorough review of its implementation until now. But there appears to be no such exercise. Given the serious implications of this investment (Consumers have to bear this burden in the form of higher cost of service) we place below our analysis of the investment under HVDS.</p>	<p>The main benefits of HVDS are to reduce theft, improve voltage profile, reduction in LT line losses, arresting of DTR failures and regularization of un-authorized services</p>												
43.	<p>7.10.3 For the following analysis we have compared LT – DTR and HVDS. We have taken the transformer capacity as 63 kVA. Hours of supply in a day is assumed as 7 hours and number of days as 240 days. Cost of power is assumed as Rs. 3.00 per unit. We examined this under three power factor capacities – 0.6, 0.7 and 0.8</p> <p>The results of our analysis are presented in the following table. In this table reduction in line losses are taken as returns on investing on HVDS.</p> <table border="1" data-bbox="298 1247 1274 1424"> <thead> <tr> <th>Power Factor</th> <th>Cost of HVDS (Rs.)</th> <th>Cost of Lt – DTR (Rs.)</th> <th>Addition al Cost (Rs.)</th> <th>Returns per year from HVDS</th> <th>Payback period (Years)</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Power Factor	Cost of HVDS (Rs.)	Cost of Lt – DTR (Rs.)	Addition al Cost (Rs.)	Returns per year from HVDS	Payback period (Years)							<p>HVDS for agl feeders are taken up mainly to reduce line losses (I²R) and to improve voltage profile. Hence the agl consumers are getting quality supply with bare minimum interruptions like blowing of fuses ,failure of dtr etc.</p>
Power Factor	Cost of HVDS (Rs.)	Cost of Lt – DTR (Rs.)	Addition al Cost (Rs.)	Returns per year from HVDS	Payback period (Years)									

					(Rs.)	
	0.6	6,29,628	1,15,000	5,14,628	18,949	27.16
	0.7	6,29,628	1,15,000	5,14,628	13,923	36.96
	0.8	6,29,628	1,15,000	5,14,628	10,660	48.28
44.	<p>7.10.4 In Andhra Pradesh a power factors of 0.70/0.80 reflect the prevailing situation. Under these conditions it takes 37 to 48 years to recover the investment made in to the HVDS system, let alone profits over it. In other words the payback period for these investments is about 37 to 48 years. The guaranteed life of these transformers is about 3 years and its life may extend 10 years, but its' payback period is several times more. Thus, financially speaking the HVDS does not appear to be attractive. Still the DISCOMs in the state are rushing in to implement it on large scale. And farmers are being coerced in to accepting it.</p>					
45.	<p>7.10.5 One of the important reasons shown in promoting the HVDS system was elimination of unauthorised agriculture connections and theft. Experience in other states like Rajasthan and Uttar Pradesh shows that HVDS is not a deterrent to these practices and even under HVDS system theft continues to take place. We hear that Noida Power Company Limited (NDPL) in UP which went in to HVDS on a large scale is now thinking about winding it up.</p> <p>7.10.6 Though the returns from this HVDS scheme are doubtful it will surely end up as a huge burden on the</p>					
	<p>The main objective of using small capacity DTRs is limit the consumers to 3-4 farmers duly regularizing the un authorized services as such there is no scope for the theft.</p> <p>The small capacity DTRs are being erected for release of new agl services in TSSPDCL. In HVDS scheme also, the existing 63/100 KVA are replaced with small capacity transformers. There is no cost difference in small capacity transformers being used in the above two scheme as there</p>					

	<p>consumers in the form of Cost of Service (COS) as these transformers are four times more costly than the present transformers.</p> <p>7.10.7 Based on these facts we request the Commission to review the past implementation of the HVDS in the state and also to put the presently proposed scheme with the support of JIBC to strictest test. We also request the Commission to direct the DISCOMs to provide us information on amount spent on HVDS and number of pump sets converted to HVDS each year since the programme was taken up.</p>	<table border="1" data-bbox="1344 219 2432 633"> <thead> <tr> <th>Year wise</th> <th>06-07</th> <th>07-08</th> <th>08-09</th> <th>09-10</th> <th>10-11</th> <th>11-12</th> <th>12-13</th> <th>13-14</th> <th>14-15</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Pump sets</td> <td>13547</td> <td>29501</td> <td>23014</td> <td>16717</td> <td>25170</td> <td>5203</td> <td>0</td> <td>0</td> <td>11414</td> <td>124566</td> </tr> <tr> <td>Amount</td> <td>34.72</td> <td>43.08</td> <td>38.00</td> <td>29.00</td> <td>150.22</td> <td>40.49</td> <td>0</td> <td>0</td> <td>55.48</td> <td>390.99</td> </tr> </tbody> </table> <p>he specifications. Hence there is no additional expenditure incurred on account of DTR cost.</p>	Year wise	06-07	07-08	08-09	09-10	10-11	11-12	12-13	13-14	14-15	Total	Pump sets	13547	29501	23014	16717	25170	5203	0	0	11414	124566	Amount	34.72	43.08	38.00	29.00	150.22	40.49	0	0	55.48	390.99	is no difference in t
Year wise	06-07	07-08	08-09	09-10	10-11	11-12	12-13	13-14	14-15	Total																										
Pump sets	13547	29501	23014	16717	25170	5203	0	0	11414	124566																										
Amount	34.72	43.08	38.00	29.00	150.22	40.49	0	0	55.48	390.99																										
46.	<p><u>Directives on running neutral wire</u></p> <p>7.10.8 In the past the Commission directed the DISCOMs to run neutral wire from 33/11 kV substations to all single phase transformers, particularly in the back ground accidents with single phase HVDS transformers. TSSPDCL replied that instruction were issued for preparation of estimates under T&D improvements and furnishing proposals under feeder works for executing the work of running of neutral wire in villages. One thing is even after such a long time they are still in the stage of</p>	<p>The Hon'ble Commission directed the DISCOMs to run neutral wire from 33/11KV substations to all single phase transformers, particularly in the back ground accidents with single phase transformers. Instructions were issued for preparation of estimates under T&D improvements and furnishing proposals under feeder works for executing the work of running of neutral wire in villages. The field Engineers complied with these instructions where ever the consumer safety is disturbed. For running neutral wire from DTRS to the Substations so far as many as 740 Nos. 11KV cross arms for neutral wiring were fabricated and issued to field. 46.3 KM conductor was allotted for said work. The neutral wire was strung from DTRS to the substations covering 15Nos. 11KV feeders emanating from various 7Nos. 33/11KV substations. The said work</p>																																		

	<p>preparing the estimates. Another thing is that as DPRs of HVDS includes cost of running neutral wire from HVDS DTR to the substation preparation of estimates and new expenditure shall not arise. The whole affair also shows that DISCOMs are least bothered about safety of the consumers.</p>	<p>based on the field requirement for the safety of Consumers in a phased manner. Running of neutral wire being taken up from single phase dtr to substation wherever earthing is not proper due to rocky soils etc.</p>														
<p>47.</p>	<p>8.1 Filings of both the TSDISCOMs show that on the T&D losses front the situation in fact is deteriorating. During 2015-16 T&D losses in NPDCL area will be 15.56% and in SPDCL area 14.91%. There is scope to bring down these losses below 7%. Way back in 2010-11 EPDCL of Andhra Pradesh clocked T&D losses of 6.96%. DISCOMS shall be directed to take concerted action to bring down these losses. Lower T&D losses lead to lower power purchase cost and lower tariff burden.</p>	<p>The TSSPDCL loss % is tabulated below</p> <table border="1" data-bbox="1346 472 2252 703"> <thead> <tr> <th>Loss</th> <th>2013-14 (Actual)</th> <th>2014-15 (Proj)</th> <th>2015-16 (proj)</th> </tr> </thead> <tbody> <tr> <td>Loss % incl. EHT</td> <td>13.20</td> <td>11.49</td> <td>10.50</td> </tr> <tr> <td>Loss % excl. EHT</td> <td>14.63</td> <td>12.61</td> <td>11.77</td> </tr> </tbody> </table> <p>TSSPDCL had considered the Losses as approved by the Hon Commission of the undivided state of Andhra Pradesh vide the MYT order dated 09.05.2014 for FY 2014-15 and for FY 2015-16. The licensee is putting all efforts to reduce the distribution losses.</p>			Loss	2013-14 (Actual)	2014-15 (Proj)	2015-16 (proj)	Loss % incl. EHT	13.20	11.49	10.50	Loss % excl. EHT	14.63	12.61	11.77
Loss	2013-14 (Actual)	2014-15 (Proj)	2015-16 (proj)													
Loss % incl. EHT	13.20	11.49	10.50													
Loss % excl. EHT	14.63	12.61	11.77													

48.	<p>8.2 Within TSSPDCL the Hyderabad South Circle T&D losses are in the range of nearly 50% of the power supplied. During the past hearings also we have brought this to the notice of the Commission. Last year the High Court treated a letter written by an electricity consumer as a petition and after hearing different parties directed the authorities to take steps to bring down these losses. Following this some raids were conducted in some of the areas falling under this circle. According to a newspaper report out of 887 services inspected there were 20 instances of theft and 350 instances of meter tampering (The Hindu, 14th April, 2014). But these raids seem to have stopped in the wake of elections to Lok Sabha and state Assembly and were not resumed after the elections. We request the Commission to direct the TSSPDCL to resume inspection of services. Bringing down these losses in Hyderabad South Circle alone will bring additional revenue of about Rs.300 crore per year.</p>	<p>Intensive inspections are being conducted on high loss feeders in the Hyd South Circle continuously to curb the theft and to reduce the losses. During last few months the no.of cases booked in the Hyd South Circle are increasing month by month and the assessment amount is also increased when compared to previous period as shown below:</p>																											
		<table border="1"> <thead> <tr> <th rowspan="2">Sl.No</th> <th rowspan="2">Period</th> <th colspan="2">Total Cases Booked</th> </tr> <tr> <th>No.</th> <th>Amount (in)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Apr 2010 - Mar 2011</td> <td>5015</td> <td>292.96</td> </tr> <tr> <td>2</td> <td>Apr 2011 - Mar 2012</td> <td>3968</td> <td>232.61</td> </tr> <tr> <td>3</td> <td>Apr 2012 - Mar 2013</td> <td>8933</td> <td>536.11</td> </tr> <tr> <td>4</td> <td>Apr 2013 - Jan 2014</td> <td>7947</td> <td>493.57</td> </tr> <tr> <td></td> <td>Feb 2014</td> <td></td> <td></td> </tr> </tbody> </table>		Sl.No	Period	Total Cases Booked		No.	Amount (in)	1	Apr 2010 - Mar 2011	5015	292.96	2	Apr 2011 - Mar 2012	3968	232.61	3	Apr 2012 - Mar 2013	8933	536.11	4	Apr 2013 - Jan 2014	7947	493.57		Feb 2014		
Sl.No	Period	Total Cases Booked																											
		No.	Amount (in)																										
1	Apr 2010 - Mar 2011	5015	292.96																										
2	Apr 2011 - Mar 2012	3968	232.61																										
3	Apr 2012 - Mar 2013	8933	536.11																										
4	Apr 2013 - Jan 2014	7947	493.57																										
	Feb 2014																												
49.	<p>8.3 According to TSSPDCL's filings during FY 2013-14 cases were booked in 21.37% of the services inspected for malpractice. During FY 2014-15, 30th September 2014 cases were booked in 18.90% of the services inspected. This may be because of lack of awareness on the part of consumers or intent to benefit from malpractices and lack of proper vigilance on the</p>	<p>During the inspection of services there is a substantial no. of Malpractice cases are being booked for last two financial years and up to Oct 2014 also. The main reason for booking more no. of Malpractice cases such as using supply for unauthorized premises, the large variation in development charges in between domestic (1000/KW + Security deposit Rs 200 for KW) and commercial/Non-domestic (2000/KW + Security deposit Rs 800 for KW) services. Some of the applicants registering for</p>																											

	<p>part the DISCOM. TSNPDCL did not report information related to inspections. We request the Commission to direct the DISCOMs to create awareness among consumers and deal strictly with malpractices among consumers as well as DISCOM staff.</p>	<p>new services in domestic purpose only, after release of supply the consumer start to open a small shop or business at the same premises without taking another commercial service, which attracts Malpractice case. The discom officers and staff are now taking efforts to create awareness among the consumers and the development charges for both domestic and commercial/Non domestic are recently made equal to Rs. 1200/KW which results in reducing of Malpractice cases in future.</p>																																								
50.	<p>Arrears</p> <p>9.1 Arrears pending for over six months to be received from consumers (with arrears above Rs. 50,000) as on 30th September 2014 stands at Rs. 2,146.34 crore (SPDCL – Rs. 1,796.07 crore and NPDCL - Rs. 350.27 crore). HT industries account for 50% of these arrears. If ordinary domestic consumers delay payments by two weeks their services are disconnected promptly. Even farmers who receive free power faces the humiliation of the starters and some times even motors being taken away by DISCOM employees if they fail to pay customer charges. But, how do these people with arrears to the tune of crores continue to receive power. In the past information related to court cases related to these arrears used to be provided. At present the same is missing.</p>	<p>Arrears more than Rs50000/-:-</p> <table border="1" data-bbox="1518 544 2343 1409"> <thead> <tr> <th colspan="5">STATUS WISE ARREARS MORE THAN Rs50000/- (LT)</th> </tr> <tr> <th>LT CAT</th> <th>LIVE</th> <th>UDC</th> <th>BS</th> <th>Grand Total</th> </tr> </thead> <tbody> <tr> <td>LT-I</td> <td>604.26</td> <td>834.7 2</td> <td>206.63</td> <td>1645.61</td> </tr> <tr> <td>LT-II</td> <td>1274.8 4</td> <td>502.1 2</td> <td>400.36</td> <td>2177.33</td> </tr> <tr> <td>LT-III</td> <td>951.79</td> <td>593.7 5</td> <td>941.45</td> <td>2486.99</td> </tr> <tr> <td>LT-IV</td> <td>6.67</td> <td>1.22</td> <td>0.00</td> <td>7.89</td> </tr> <tr> <td>LT-V</td> <td>2281.8 6</td> <td>238.9 9</td> <td>1135.83</td> <td>3656.68</td> </tr> <tr> <td>LT-VI</td> <td>59904. 83</td> <td>616.1 6</td> <td>13.69</td> <td>60534.68</td> </tr> </tbody> </table>	STATUS WISE ARREARS MORE THAN Rs50000/- (LT)					LT CAT	LIVE	UDC	BS	Grand Total	LT-I	604.26	834.7 2	206.63	1645.61	LT-II	1274.8 4	502.1 2	400.36	2177.33	LT-III	951.79	593.7 5	941.45	2486.99	LT-IV	6.67	1.22	0.00	7.89	LT-V	2281.8 6	238.9 9	1135.83	3656.68	LT-VI	59904. 83	616.1 6	13.69	60534.68
STATUS WISE ARREARS MORE THAN Rs50000/- (LT)																																										
LT CAT	LIVE	UDC	BS	Grand Total																																						
LT-I	604.26	834.7 2	206.63	1645.61																																						
LT-II	1274.8 4	502.1 2	400.36	2177.33																																						
LT-III	951.79	593.7 5	941.45	2486.99																																						
LT-IV	6.67	1.22	0.00	7.89																																						
LT-V	2281.8 6	238.9 9	1135.83	3656.68																																						
LT-VI	59904. 83	616.1 6	13.69	60534.68																																						

			LT-VII	223.24	164.8 6	40.30	428.40	
			LT-VIII	0.00				
			Grand Total	65247.49	2951.82	2738.26	70937.58	
			% OF SHARE IN ARREARS					
			LT-I	1	28	8	2	
			LT-II	2	17	15	3	
			LT-III	1	20	34	4	
			LT-IV	0	0	0	0	
			LT-V	3	8	41	5	
			LT-VI	92	21	1	85	
			LT-VII	0	6	1	1	
			LT-VIII	0	0	0	0	
			Grand Total	100	100	100	100	
		The % of Domestic in live is only						LT arrears services
			Rs.604.26 Lakhs (1%) to be persued where as in LT Agricultural category the live arrears are Rs.2281.86Lakhs (3%). The major arrears is from Street light and water works Cat-6 live arrears Rs.59904.83 Lakhs					

(92%). Constant persuasion is done with Govt. for collection the amounts and reducing the Arrears to the least extent.

STATUS WISE ARREARS MORE THAN Rs50000/- (HT)				
CAT	PVT	GOVT	Court Cases	Grand Total
1	38889. 26	27000. 36	26310.6 2	92200.23
2	1338.0 5	4442.3 7	2522.49	8302.91
3	58.16	41.91	352.42	452.49
4	1433.3 3	5176.5 2	17.21	6627.06
5	0.00	529.57	30.50	560.07
6	0.00	10.07	24.12	34.19
TMP	267.07	0.00	225.75	492.82
Gra nd Tota l	41985 .86	37200. 80	29483.1 2	108669.78

S.No	Summary of Objections / Suggestions	Response of the Licensee
	8. Ferro Alloys Producers Association	
1.	<p>There were departures from the MYT Regulations issued by the Hon'ble Commission which contemplates predictability and certainty in tariffs. The Hon'ble Commission should not have allowed such departures which resulted in tariff uncertainty and unpredictability of tariffs during the MYT regim</p>	<p>It is to submit that the TSSPDCL has been following the MYT scheme for distribution business for the 2nd Control period i.e. 2009-10 to 2013-14 and also for 3rd control period as per clause-6 of the Regulation 4 of 2005. The distribution Licensee could not file the ARR for retail supply business for the entire control period due to significant uncertainty prevalent on the availability of energy and the cost of power purchase for 3rd Control period. There was uncertainty in commissioning dates of the GENCO Stations, central generating stations, and other generating stations.</p> <p>State Commission by its order dated 15.12.2014 has granted permission for the TS discoms to file ARR annually for the FY 2015-16 in terms of its conduct of business regulations.</p> <p>It is pertinent to mention here that the Hon APTEL in Appeal No.126 & 159 of 2012 filed by AP Ferro Alloys association against the APERC tariff Order for FY 2012, upheld the decision of the Hon Commission vide its order dated 04th September 2013 at para 17 of the order and the same is produced below: <i>“Admittedly, as per the Regulations, <u>the State Commission has powers to allow the filing of ARR/tariff proposal for retail supply business on annual basis</u> and the State Commission has exercised its power after considering the reasons given by the Distribution Licensees and passed reasoned order granting the permission which is perfectly legal”</i>.</p> <p>As rightly pointed out by the objector, MYT Regulations issued by the Hon'ble Commission aim to bring predictability and certainty tariffs by establishing the principles of tariff</p>

		<p>determination.</p> <p>The Licensee has been promptly filing the MYT for distribution business for all the three control period till date.</p> <p>However on the retail supply front, the licensee face the key challenges such as low generation from gas IPPs and corridor constraints which result in high variation in cost of power purchases. As power purchase constitute around 75% of the retail supply cost, variations on power purchase cost has a significant impact.</p> <p>Hence the licensee has requested for filing of retail supply business on an annual basis.</p>
2.	<p>The agricultural consumptions are not metered which is in contravention of Section 55 of the Electricity Act,2003 and the Hon'ble Commission has been for several years issuing directions in this regard. We appeal to the Hon'ble Commission to ensure the implementation of the directions of metering these connection without further delay so as to ensure better management and increase in metered sales. This will ensure transparency in accounting for energy supply to agriculture as well as arriving at distribution losses accurately without adjusting the residual energy under agriculture consumption.</p>	<p>It is to state that not metering of Agriculture consumption is contravention of Section 55 of the Act is not correct. Though section 55(1) mandates the licensee to supply electricity through a correct meter, the second provision of sec 55(1) says that '<i>provided further this the state commission may, by notification extend the said period of two years for a class or classes of persons of persons or for such area as may be specified in that notification.</i>' In pursuance thereof, the Hon commission of undivided state of Andhra Pradesh, every year in the tariff order stated that since metering agricultural is not completed, the estimation of agricultural consumption shall be done as per the methodology which is approved by commission. At present in the tariff order for FY 2013-14, the commission directed the discoms to estimate the agricultural consumption based on new methodology which is approved and the same is being complied by the Licensee and submitted to Hon'ble Commission.</p>
3.	<p>It is pertinent to mention that the agriculture consumption over and above the approved quantum should be entirely met with the Governemnt subsidy only and this should not be burdened further on the already</p>	<p>Hon'ble Commission is approving agriculture sales quantum based on previous years approved agriculture sales. Infact the commission has approved same sales of FY2012-13 for</p>

	<p>subsidising class of consumers. This acquires greater significance in the light of expensive power being purchased by Discoms to meet the increased demand of agriculture.</p> <p>The high cost power purchase necessitated by excess requirement of agriculture demands, should be met with the Government funds and this should not be allowed as a pass through.</p>	<p>FY2013-14 also without considering releasing of new agriculture connections during FY 2013-14.</p> <p>TSDISCOMS are filing for true up for FY 13-14 and FY 14-15 based on actual sales, power purchase data etc. TSDISCOMS pray to the Hon'ble Commission to accept the true up amount</p>
4.	<p>The Discoms are submitting unrealistic and inflated power requirement in the industry consumptions requiring purchase of high cost power. Such unrealistic projections would only result in higher power purchase cost and increase in tariffs for the consumers. We request the Hon'ble Commission not to allow such inflated estimates.</p>	<p>Sales projections are made as per the historical sales data, upcoming loads which will have large impact in the sales, anticipated economic & climatic conditions, Govt. policies on industry, etc. The licensee is projecting sales with the acceptable scientific methods.</p> <p>The sales to industrial category in previous years (FY 12-13 and 13-14) has been constrained due to restriction and control measures. For FY 2015-16 sales has been arrived after adjusting for restriction and control (R & C) measures which were earlier in place.</p> <p>Sales for other categories were done on realistic basis considering historical trend and future plans. The overall sales for FY 2015-16 is projected to grow at 12% over previous year.</p>
5.	<p>The imported coal prices are steadily falling down. Adjustment in the coal mix should proportionately be reduced from the power purchase cost.</p>	<p>Suggestion is noted.</p>
6.	<p><u>True-up for 2013-14 and 2014-15:</u></p> <p>The Discoms have stated that while there is a decrease in metered sales, and an increase in unmetered sales beyond tariff order quantities resulting in tariff distortion. Hence the Hon'ble Commission may direct the Government to reimburse the cost of sales to agriculture in excess of tariff order quantity and to ensure the subsidizing category of consumers are reimbursed to maintain the level of cross subsidy as per the ratio of tariff order in view of the decrease in metered sales.</p> <p>As per the Regulation No:4 of 2005 the Trup-up is to be taken for the whole control period. However, the Discoms have submitted petititon for true up for retail sales for 2013-14 alone. This is in contravention of the</p>	<p>The gains/losses of upto FY 2012-13 are claimed under FRP (Financial Restructuring Plan) along with the true-up of Retail supply Business for FY 2013-14 and the same was explained in chapter 3.9.7 of the Licensee petition.</p> <p>Further the licensee has claimed the true up of distribution Business for FY 2013-14 in the Distribution Business filings submitted to the Hon Commission for 3rd control period on 04.03.2015.</p> <p>As highlighted by the objector, the licensee has been facing adverse sales mix wherein sales from higher tariff categories</p>

	<p>Regulations which the Hon'ble Commission should not have allowed. The gains that could have been accrued on account of excess agricultural sales over and above the approved quantities by the Commission of previous years of the control period should have been passed on to the consumers. We request the Hon'ble Commission to look into this aspect and do justice to the consumers who are over burdened with inflated FSA claims.</p>	<p>has gone down compared to sales in lower tariff categories. This has resulted in licensee realizing lower revenue than which was approved in the tariff order.</p> <p>Regulation no 4 of 2005 doesn't allow the licensee to recover revenue due to adverse sales mix variation. The licensee prays that the Hon'ble Commission considers the revenue loss to the discom due to the sales mix variation.</p> <p>As mentioned in the retail-supply write-ups, accumulated losses incurred by the discom as on 31st March 2013, has been considered under FRP scheme. Hence the the discoms have submitted the true-up petition for FY 2013-14 which was not covered under the accumulated losses till 31st March 2013.</p> <p>FSA is a mechanism which allowed the discoms to recover the power purchase cost which is in excess of the approved level due to variation in cost as well as quantity purchased. Hence the discoms do not accrue any gain through FSA rather it is a cost recovery mechanism.</p>																				
7.	<p>Voltage wise Tariffs for the current financial year and ensuing financial year, applicable to Ferro Alloy Industry category in the state of Telangana, as submitted by TS DISCOMs to the Hon'ble TSERC are shown in the following Table.</p> <table border="1" data-bbox="303 1062 1481 1369"> <thead> <tr> <th>Voltage Level (kV)</th> <th>Existing Tariff (FY 2014-15) Rs/KWH</th> <th>Voltage Wise Difference</th> <th>Proposed Tariff (FY 2015-16) Rs/KWH</th> <th>Voltage Wise Difference</th> </tr> </thead> <tbody> <tr> <td>11</td> <td>5.41</td> <td>0.43</td> <td>5.72</td> <td>0.45</td> </tr> <tr> <td>33</td> <td>4.98</td> <td>0.40</td> <td>5.27</td> <td>0.43</td> </tr> <tr> <td>132 kV & above</td> <td>4.58</td> <td>N/A</td> <td>4.84</td> <td>N/A</td> </tr> </tbody> </table> <p>It can be observed from the above Table that, the difference between the</p>	Voltage Level (kV)	Existing Tariff (FY 2014-15) Rs/KWH	Voltage Wise Difference	Proposed Tariff (FY 2015-16) Rs/KWH	Voltage Wise Difference	11	5.41	0.43	5.72	0.45	33	4.98	0.40	5.27	0.43	132 kV & above	4.58	N/A	4.84	N/A	<p>The variation in tariff at different voltages of Ferro Alloy Producers is almost similar to variation in tariffs at different voltages for other industrial category consumers. Further the ToD is not being levied on Ferro Alloys consumers as other similar industrial consumers are levied with ToD and demand charges.</p> <p>The hike in tariff is due to unavoidable increase in cost of service which is again due to increase in power purchase cost and the cost of network.</p> <p>The difference between tariffs of other consumers at 33 kV and 132 kV may not be equal to the difference in losses between the said two voltage levels as the tariff at a particular voltage</p>
Voltage Level (kV)	Existing Tariff (FY 2014-15) Rs/KWH	Voltage Wise Difference	Proposed Tariff (FY 2015-16) Rs/KWH	Voltage Wise Difference																		
11	5.41	0.43	5.72	0.45																		
33	4.98	0.40	5.27	0.43																		
132 kV & above	4.58	N/A	4.84	N/A																		

	<p>tariff applicable to EHT Consumers (132 kV and above) and 33 kV consumers for the ensuing year is Rs 0.43/Unit. This wide disparity amounting to about 9% is not explained anywhere in the Tariff proposals of the DISCOMs. The difference is extremely wide and is inexplicably set without any reasons, to the disadvantage of the Industry.</p> <p>Entrepreneurs intending to set up low capacity Ferro Alloy Units in medium sector i.e up to 5 MVA of Contracted Capacity (10 MVA in case of dedicated feeders) are burdened with high tariffs applicable at 33 kV, and are discouraged to enter into business. The existing consumers are feeling the burden in terms of increased production costs and to compete with large scale producers with 132kv voltage.</p> <p>Certainly, there should be a slight differentiation between Voltage wise tariffs, owing to the fact that the Consumers drawing power at Higher Voltages cause less losses to the system and use less proportion of the Distribution Network. The voltage wise tariffs should reflect technically and commercially the usage of the network, but should not be so onerous to deplete the consumers existing at 33 kV level.</p>	<p>level not only depends on the losses at that level, but also on cost of network and its maintenance.</p> <p>The average CoS of the Licensee is Rs 5.90/unit and the tariffs of all the categories of Ferro Alloy Units is in the range of (-) 3 to (-) 18% of the average cost of supply thus providing a favourable tariff for Ferro Alloys Industry as compared to other HT industrial units taking power at similar voltage levels. Thus, the Distribution Licensee has been fair to the Ferro Alloys industry.</p> <p>TSDISCOMS have strived to pass on the cost savings to consumers who are connected at a higher voltage level like 33 kV and 132 kV in the form of a lower tariff. The difference in tariff is only 9% which is as explained above the passing on the benefit of lower losses to higher voltage consumers.</p>
8.	<p>The power procurement cost based on escalation in the variable costs over and above the actual variable cost is not in line with the Regulations. Generation cost from central stations is governed by CERC Tariff Regulations and should be considered accordingly. Variable costs may not be considered on the presumptive basis of the licensees and may be based on actual. Any variation in fuel price is adjusted through annual True-up mechanism.</p>	<p>TSDISCOMS have considered Fixed Cost as furnished by the Generating stations which are derived based on the CERC Terms & Conditions of Tariff Regulations. Tariff regulations allow for a pass through of variable cost and this has been considered accordingly by TSDISSOMS while projecting the variable cost</p>
9.	<p>It is a proven fact that, the Ferro Alloy Industry operates at a very higher Load factor, of above 90%. In certain cases, the load factor reaches to even 95% to 98%. The industry is very power intensive in nature and operates at a flat load pattern, which is very much desired by the Grid Operators. The flat load pattern of this industry, gives lot of certainty to the DISCOM to procure power on long term basis at a cheaper cost. That is the reason why, Electricity Act mandates that Consumer's load factor should be given due consideration while fixing the tariffs. Relevant provision of the</p>	<p>Tariffs of the Ferro Alloys Industry at different voltage levels are within $\pm 20\%$ of the average cost of supply as per the Tariff Policy. Infact at all voltage levels, the proposed tariff is below COS.</p> <p>Considering the high load factor of Ferro alloy industries, TSDISCOMS have not proposed any demand charges for this consumer category and has only proposed a very nominal</p>

	<p>Electricity Act-2003 is presented below:</p> <p>Section 62 (3) of the Electricity Act 2003: <i>“The Appropriate Commission shall not, while determining the tariff under this Act, show undue preference to any consumer of electricity but may differentiate according to the consumer’s load factor, power factor, voltage, total consumption of electricity during any specified period or the time at which the supply is required or the geographical position of any area, the nature of supply and the purpose for which the supply is required”.</i></p>	increase in energy charges by 5.75% only.
10.	<p>The embedded cost of service, pertaining to HT Industrial category for 33 kV, as estimated by the DISCOM for FY 2015-16 is Rs 4.84/kWh. The same for EHT (132 kV and above) Industrial category is Rs 4.69/kWh. The difference between embedded CoS between 132 kV & 33 kV is Rs 0.15/kWh.</p> <p>As per the methodology of embedded CoS, the category wise / voltage wise Cost of Supply is estimated duly taking all costs and voltage wise losses duly attributing to different categories on certain technical / commercial parameters. For determining Retail Tariffs embedded CoS is the basis.</p> <p>Even if we compare with the difference in embedded CoS as worked out by the DISCOM, the tariff difference between 132 kV & 33 kV Ferro Alloy units should be Rs 0.15/kWh only and certainly not Rs 0.43/kWh as filed by the DISCOM.</p> <p>The Hon’ble Commission is kindly requested to look into the matter and determine the tariff on similar lines with embedded CoS, and keep the difference between 132 kv & 33 kV Ferro Alloy tariff accordingly.</p>	
11.	<p>As per the filings of TSSPDCL, actual distribution losses for FY 2013-14 is 13.20% as against the APERC target of 11.44%. TS SPDCL missed the loss reduction target by 1.76%. As per the estimate and figures submitted by the DISCOM 1% loss corresponds to about Rs 165 Crs. If the DISCOM is able to contain the losses within the target specified by the Hon’ble APERC, there is no requirement of Tariff hike.</p>	<p>It is submitted that originally during the second control period Hon Commission has fixed stiff loss targets. The Discoms have filed petition to revise the stiff loss trajectory fixed by the Commission to realistic levels. Hon Commission taking in to account ground realities has revised the loss targets in the Tariff Order 2010-11 for years from 2010-11 to 2013-14. Discoms have been striving to reduce Losses and</p>

		between the First and second control periods, the losses have reduced from 19.47 % to 13.20 %.
12.	<p>Time Period of Load Restrictions/Power Cuts & Outages to be relaxed for calculation of Deemed consumption:</p> <p>Some times, DISCOMs are announcing unscheduled power restrictions / Power cuts and are causing lot of inconvenience to the Ferro Alloy industry. Utilities are not sure of supplying 24X7 power to the Industrial sector particularly Ferro Alloy units. Even the Distribution network of the utilities is prone to lot of forced outages and is taking more time to restore the system. At least about 10% - 12% of the time, power supply is not made available on an annual basis due to forced outages and breakdowns in the system. Added to this, the DISCOMs are implementing Restriction & Control (R&C) measures, during certain periods of the year, during the peak load time (6:00 P:M to 10: 00 P:M) and other times of the day.</p>	While calculating the deemed consumption, the licensee is deducting the R&C periods (if any)
13.	<p>It is expected that, even for the ensuing year of FY 2015-16, the TS DISCOMs are not quite sure of providing quality and uninterrupted power to the Industrial Sector. About 20% of the time required quantum of power supply may not be available to the industry in view of shortage of generating capacity from the committed sources / Short term sources. It is estimated that, as a whole about 30% of the time, required power is not made available to the Ferro Alloy industry in an year. This is causing lot of operational / financial burden to this sector. Hence it is earnestly requested that, till such time the DISCOMs assure 24X7 power supply to the Ferro Alloy units through out the year, the deemed consumption charges shall not be levied and the billing can be insisted on the actual energy consumption.</p>	<p>TSDISCOMs have estimated sales for the industrial sector based on the historical growth trend after accounting for the restrictions which were in place in previous year.</p> <p>TS DISCOMs have arrived at the power procurement plan to fully meet the projected sales from the consumer categories including Ferro Alloys.</p>
14.	<p>Vide the ARR filings, TS DISCOMs have requested Hon'ble Commission to recover the loss amount restructured as short term loan over and above Rs2450 Crs, as when restructuring is done by the TS DISCOMs in tune with the objectives of the State Government . They requested the Commission to allow the licensees to recover the principle amount due from FY 2017-18 onwards. TS SPDCL has estimated a true up requirement</p>	TSSPDCL has claimed the True up as per the Regulation 4 of 2005.

	<p>for FY 2013-14 as Rs (161.74) Crs after duly accounting for variations in Costs and Revenues. For FY 2014-15 TSSPDCL estimated a revenue gap of Rs 1283 Crs that need to be trued up on provisional basis.</p> <p>It is humbly pointed out that the State Government has to take up the entire responsibility of financial restructuring of the DISCOMs, and the burden should not be levied on to the consumers. Principal repayment has also to be borne by the State Government.</p> <p>If the True Up burden is loaded on to the approved ARR of the DISCOMs by the Commission, it unnecessarily burdens the end consumers.</p>	
15.	<p><u>The present Economic scenario:</u> The present economic situation Globally and domestically is not encouraging the manufacturing sector. Countries like China and Russia are dumping steel in huge quantities into Indian markets throwing the Indian production out of gear. Major steel plants are cutting their production levels and offering price cuts, which is affecting badly the Ferro Alloys industry. Today in the Telangana State, the Ferro Alloys units are bleeding cash losses and are unable even to meet their current CC charges bills of Discoms. The producers are not even able to sell a Kg. of metal even with heavy discounts and longer credit periods.</p> <p>On the other hand, the World Bank in its Indian Power Sector Review Report in respect of both the States of A.P. and Telangana, published recently, reiterated among other things, the following: Quote: The Distribution segment of A.P.**power sector, which is the first hand revenue earning system has begun to lose money since 2012-13, the report which studied the 20 year period since economical liberalisation, noted. It attributed the losses to rising cost of power purchase and a decline in the subsidy received vis-à-vis the subsidy booked. Cost of power purchase rose sharply for distribution companies from Rs.2.81 per unit in 2009-1 to Rs.3.39 per unit in 2011-12 and to Rs.4.25 per unit in 2012-13. The volume of power purchase from short term sources rose by 14 percent in three years from 866 Mus in 2009-10 to 10,094 Mus in 2012-13. Taking</p>	<p>The Discoms, Transco and Genco are alive to the challenges highlighted by the objector and following are some of the key steps been taken to address the concerns</p> <p>TS Genco</p> <p>Following capacity additions (thermal) are been planned</p> <ul style="list-style-type: none"> - KTHP Stage II – 600 MW - KTHPS Stage VII – 800 MW - Manuguru 1080 MW - Damarcherla A 1200 MW - Damarcherla B 3200 MW - KTHPS Stage VII – 800 MW <p>In addition 250 MW from Hydel sources are planned. Issue of low PLFs due to coal shortage is been taken up with Coal India at all forums for resolution.</p> <p>MOU was signed with Govt of chatisgarh for procurement of 1000 MWs of power</p> <p>Corridor constraint issue is been addressed through the execution of new inter-state transmission lines</p>

<p>cognizance of the State's constraints in purchasing cheaper power from other regions owing to inadequate inter-regional connectivity. The World Bank Report also pointed out the low Plant Load Factor (PLF) of the existing thermal plants and the delays in commissioning of new plants for lack of fuel as the limitations. On the other hand, subsidy received as share of subsidy booked began to decline from 2008-09 onwards and stood at only 50% in 2011-12, resulting in cash flow problems for the Discoms. The report recommended capacity addition in generation, grid strengthening and enhancing ability to absorb power flows, especially from renewable and reinforcing of distribution network, household metering and segregation of feeders among others.....</p> <p>Unquote: (** the erstwhile State of A.P. consisting both A.P. and Telangana)</p>	<p>Wardha- Nizamabad- Hyderabad (765 kV D/C line) Warora – Warangal – Hyderabad (765 kV D/C line)</p> <p>In addition system strengthening and new schemes are being executed by TS Transco to ensure adequate grid reliability and availability.</p> <p>To improve the operational performance, the discoms are conducting energy audit drives as well as meter replacement drives (replacement of mechanical meters with IR port meters and smart meters/ AMR for industrial loads) improving HVDS penetration as well as feeder segregation works. These are expected to improve the financial performance of the discom as well.</p>
--	--

S.No	Summary of Objections / Suggestions	Response of the Licensee
	<p>9. నారాయణ రెడ్డి, అమ్మడాపురం (గ్రా), మొయినాబాద్ (మ), రంగారెడ్డి జిల్లా</p> <p>10. శంకర్, మాజీ సర్పంచ్, తోలుకట్ట (గ్రా), మొయినాబాద్ (మ), రంగారెడ్డి జిల్లా</p> <p>11. కావలి బిక్షపతి, బాదుర్ గూడ, శంషాబాద్ (మ), రంగారెడ్డి జిల్లా</p> <p>12. జి. బుచ్చి రెడ్డి, మహా లింగాపూర్ (గ్రా), శంకర్ పల్లి (మ), రంగారెడ్డి జిల్లా</p>	
1.	<p>వ్యవసాయ కనక్షన్ సాంక్షన్ అయిన రైతు మెటెరియల్ పోల్స్ (స్రంభాలు) వివరములు రైతుకు వ్రాతపూర్వకంగా ఇచ్చి, రైతు సంతకం తీసుకొనినట్లు చూపగలరు. అట్టి గానిచో రైతుకు సాంక్షన్ అయిన మెటెరియల్ తక్కువగా చూపించి అదే మెటెరియల్ రైతుకు అమ్ముచున్నారు.</p>	<p>సలహాను గుర్తించాము.</p>
2.	<p>మెట్ట ప్రాంత రైతులు; భూగర్భ జలాలు లోతుకు వెళ్ళడం కారణంగా 400fts బోర్లు వేయుచున్నారు. దీనికి గాను 7.5HP; 10HP మోటార్లు ఉపయోగించ వలసి వస్తుంది. 150 అడుగులు - 200 అడుగులు 5HP మోటారు ద్వారా వచ్చు నీళ్ళు, 400 అడుగులు 7.5HP - 10HP మోటార్లతో వచ్చు నీళ్ళు సమానంగా ఉండునా. కావున భూగర్భ జలాలు లోనికి పోయినందున మాత్రమే HP పెంచ వలసి వస్తుంది. కావున HP తారతమ్యాన్ని తొలగించగలరని మా మనవి.</p>	<p>కరెంటు వినియోగాన్ని బట్టి బిల్లు వసూలు చేయాలి కావున HP ని బట్టి తారతమ్యతను తొలగించలేము paying consumers</p>
3.	<p>SC రైతులు అయిన మేము 20సం. క్రితం 5 HP మోటార్ కు సాంక్షన్ చేసినాము. చిన్న, చిన్న రైతులు అయిన మేము ఇన్ కం టాక్స్ కట్టలేదు మరియు పేయింగ్ కాటగిరీ క్రింద బిల్లులు వస్తున్నాయి. చిన్నా చితకా కారణాలు చూపి పేయింగ్ కాటగిరీ మార్చటం లేదు. MRO సర్టిఫికేట్ గూడా సబ్మిట్ చేసినాము. ఇప్పటి వరకు 20,000 రూ. చెల్లించినాము. ఇంకా 30,000 నుండి 45,000 బాకీ ఉన్నాం అని స్టార్ట్ల పీకుకుని పోవుచున్నారు. పోలీస్ కేస్ పెడతాం అంటున్నారు. కాబట్టి పేయింగ్ కాటగిరీ నుండి మార్చి ఉచిత విద్యుత్ కు సంబంధించిన సెక్షన్లో మార్చగలరు అని,</p>	<p>శ్రీ కావలి బిక్షపతి సర్వీస్ నం. 420400418, Dt .10.04.2006 నాడు రిలీజ్ చెయ్యడం జరిగింది. తరువాత పేయింగ్ క్యాటగిరి లో 625 యూనిట్ లకు బిల్లు చెయ్యడం జరిగింది మొదలు: ఆగస్టు 2009 నుండి సెప్టెంబర్ 2013 వరకు. తరువాత శ్రీ క్యాటగిరి కి మార్చడం జరిగింది. ఎందుకంటే ఇతను IT పేయర్ కాదు. బిల్లులు సమర్పించిన అదనపు పత్రాల ఆధారంగా సవరించబడ్డంది. ఇంతవరకు రూపాయలు 2,300/- కట్టడం జరిగింది.</p>

	మరియు అదనంగా చెల్లించిన డబ్బులు తిరిగి ఇప్పించగలరని ప్రార్థిస్తున్నాను.	
4.	సుమారు 15-20 సం. క్రితం తీసుకున్న వ్యవసాయ విద్యుత్ కనక్షణు, మాకు సాంక్షన్ లేదు అని మా కంప్యూటర్లో కనబడటంలేదు అని, ఎటువంటి ముందస్తు నోటీస్ లేకుండా కాంట్రాక్ట్ లేబర్ హెల్పర్లు ఇట్టి మోటార్ యొక్క స్టార్టర్ డబ్బాలను; కరంట్ వైర్ లనూ తీసుకొని పోవుచున్నారు. సర్వీస్ నెం. నెట్ లో లేకపోవడం, వారి ద్రిప్టిలో రైతు తప్పుగా భావించుచున్నారు. కావున తమరు ఇట్టి విషయంలో పరిశీలన జరిపి సంబంధిత రైతులకు న్యాయం చేయగలరని మా మనవి.	సర్వీస్ కనెక్షన్ రిజిస్టర్ పరిశీలించడం జరిగింది. అందులో శ్రీ . జి.బుచ్చి రెడ్డి, మహాలింగాపూర్ (వి) అనే పేరు లేదు. అసిస్టెంట్ ఇంజనీర్ / ఆపరేషన్ / శంకరపల్లి గారు శ్రీ. జి.బుచ్చి రెడ్డి, గారిని ఫోనులో కాంటాక్ట్ చేయడం జరిగింది, వివరాలు పరిశీలన చేయబడుతుంది.

S.No	Summary of Objections / Suggestions	Response of the Licensee
	<p>13. ఆర్. గోపాల్ రెడ్డి, చిన్న శంకర్ పల్లి (గ్రా), శంకర్ పల్లి (మ), రంగారెడ్డి జిల్లా</p> <p>14. మాది రెడ్డి రాజి రెడ్డి, భారతీయ కిసాన్ జిల్లా అధ్యక్షులు, 20-160/1/1; R .బ. నగర్, శంషాబాద్ (మ), రంగారెడ్డి జిల్లా</p> <p>15. మాచాన్న గారి రామ్ రెడ్డి, భారతీయ కిసాన్ మండల అధ్యక్షులు, మహా లింగాపూర్ (గ్రా), శంకర్ పల్లి (మ), రంగారెడ్డి జిల్లా</p> <p>16. ఎం. ప్రభు సాగర్, రామం జీవూర్ (గ్రా), శంషాబాద్ (మ), రంగారెడ్డి జిల్లా</p>	
1.	<p>రంగ రెడ్డి జిల్లా వ్యాప్తంగా కరంట్ వైర్ లు సరి చేయకపోవడం వలన రైతులు కరంట్ వైర్లు తగిలి చనిపోవుచున్నారు. తమరు దయ తలచి విద్యుత్ వైర్ లను సరి చేయగలరు.</p>	<p>విద్యుత్ వైర్లను అవసరంను బట్టి ఎక్కడైతే చెడిపోయి ఉన్నదో అటువంటివన్ని కొత్త కరెంట్ తీగలలో మార్చబడుచున్నవి.</p>
2.	<p>అన్ని స్థాయిలలోని కార్యాలయాల్లో ఆస్ లైన్ కంప్లైంట్ ను స్వీకరించినట్లు ఆదేశించగలరు, మరియు సమస్య పరిష్కరించిన తరువాత ఆస్ లైన్లో రిఫై ఇచ్చినట్లు చూపగలరు. సెల్ ఫోన్ కు సంక్షిప్త సమాధానం (SMS) ఇవ్వగలరు</p>	<p>Suggestion noted</p>
3.	<p>APERC సూచనల ప్రకారం WHITE RATION CARD ఎక్కడా లేదు. అన్ని ఆదాయ మార్గాల ద్వారా IT pay చేస్తే. Company Act క్రింద రిజిస్టర్ వ్యవసాయం చేస్తే అది Corporate కన్సుమర్ అవుతారు. 3 కనెక్షన్లు అంతకన్నా ఎక్కువ ఉన్న వాళ్లకు 50 పై. వంతున, మరియు ఆయకట్టు ప్రాంతంలో 2 1/2 ఎకరాల కన్నా ఎక్కువ ఉన్న కన్సుమర్ బిల్లు చెల్లించాలి. కాని రంగారెడ్డి సదరస్ సర్కిల్ పరిధిలో (SOUTH CIRCLE) గ్రామాల్లో ఉండే పేద రైతులు కూడా IT కేటగిరి క్రింద డిక్లర్ చేసినారు. వీరిని free కన్సుమర్ క్రింద, వారు ప్రీ కరంట్ కు అర్హత గలరు. అట్టి వారిని ప్రీ కరంట్ కు మార్చమని అడిగితే WHITE RATION CARD ఇవ్వమని అడుగుతున్నారు. ఈ</p>	

	<p>కన్సుమర్లు ఎవరు కూడా పైన చెప్పిన పరిధిలోకి రారు. వీళ్ళు తాహసీల్డార్ ద్వారా ఇన్ కం సర్టిఫికేట్ ఇటీవలిది సబ్సిడీ చేసిన కూడా WHITE RATION CARD లేదు అనే సాకుతో వీళ్ళను free కన్సుమర్ క్రింద మార్చడం లేదు. దీనికి సంబంధించిన క్లెయిమ్ గైడ్ లైన్స్ ఇవ్వగలరు. గులాబి రేషన్ కార్డు ఉంటే IT కట్టని రైతులకు 3 కనెక్షన్లు లోపు తక్కువగా ఉన్న రైతులకు ప్రీ కరంట్ కు అర్హులు కాదా!</p>	<p>వ్యవసాయ వినియోగదారులు చెల్లింపు కేటగరీ నుండి ఉచిత కేటగరీ కి మార్పిడి కి సంబంధించిన సవరించిన ఉతర్వులను దీనికి జత చేయడం అయినది. (Annexure-I)</p>
4.	<p>ఉచిత కరంట్ గూర్చి దరఖాస్తు చేసుకునే రైతుకు (ఇన్ కం టాక్స్ పేమెంట్ చేయని రైతు), గులాబి రేషన్ కార్డు కల్గి ఉన్న రైతులకు, తెల్ల రేషన్ కార్డు తెమ్మని మా అప్లికేషన్లు రిజెక్ట్ చేయుచున్నారు. తమరితో మనవి చేయునది ఏమనగా! "ఇన్ కం టాక్స్ పరిధి లోకి రాణి రైతులకు తెల్ల గులాబి రేషన్ కార్డు అనే ప్రశ్నను తొలగించగలరు".</p>	
5.	<p>రంగారెడ్డి దక్షిణ SE గారు రైతులను 24.11.2014 న LATEST WHITE RATION CARD లేదు అనే కారణంతో, ఉచిత కరెంట్ కు దరఖాస్తు చేసుకొన్న రైతులకు, దరఖాస్తులను తిరిగి పంపించుచున్నారు. తెలంగాణ రాష్ట్ర ప్రభుత్వం ఏర్పడిన తర్వాత, రేషన్ కార్డు జారీ చేయలేదు. మరి ఇట్టి దొర గార్ని LATEST RATION CARD రైతు ఎచ్చట నుండి తెచ్చి ఇవ్వగలరు. పరిగణన లోనికి రాణి కారణాలను చూపిస్తూ సాక్షి అవు చేయడం సరియైన పద్ధతి కాదు.</p>	

S.No	Summary of Objections / Suggestions	Response of the Licensee
	<p>17. దేవిరెడ్డి, లక్ష్మా రెడ్డి గూడ (గ్రా), శంకర్ పల్లి (మ), రంగారెడ్డి జిల్లా</p> <p>18. జనార్ధన రెడ్డి, గాజులగూడ (గ్రా), శంకర్ పల్లి (మ), రంగారెడ్డి జిల్లా</p> <p>19. CH. అనంతమ్మ, మహా లింగాపూర్ (గ్రా), శంకర్ పల్లి (మ), రంగారెడ్డి జిల్లా</p> <p>20. ఎం. రామదాస్, మహా లింగాపూర్ (గ్రా), శంకర్ పల్లి (మ), రంగారెడ్డి జిల్లా</p> <p>21. ప్రకాష్ చారి, మహా లింగాపూర్ (గ్రా), శంకర్ పల్లి (మ), రంగారెడ్డి జిల్లా</p> <p>22. సురేందర్ రెడ్డి, బాబా గూడ (గ్రా), షామీర్పేట్ (మ), రంగారెడ్డి జిల్లా</p>	
1.	<p>దరఖాస్తు దారులకు సీరియల్ నెంబర్ కేటాయించి వారి సేవలు సీరియల్ నెంబర్ వారీగా చేయించగలరు. 7 గం. ల కరెంట్ కు అంతరాయం ఫీజులు పోయినపుడు సిబ్బంది వెంటనే స్పందించడం జరగదు. ఆ పూట కరెంట్ నష్టపోతామని ఆత్మతలో రైతులు ట్రాన్స్ఫార్మర్ దగ్గర ఫీజు వేయడానికి వెళ్లి ప్రాణాలు కోల్పోతున్నారు. కావున ప్రతి ట్రాన్స్ఫార్మర్ కు 7 గంటల కరెంట్ సస్పెన్షన్ చేయగానే కట్ అవునట్లు టైమర్లు అమర్చగలరు. 20 నుండి 45 సం. నది వయస్సు రైతులు చనిపోవడం వలన వారి కుటుంబాలు వీధిన పడుచున్నవి. ఇట్టి టైమర్లను అమర్చ విలువైన యువ రైతుల ప్రాణాలను కాపాడగలరని ప్రార్థిస్తున్నాను.</p>	<p>విద్యుత్ ఉపాకేంద్రంనుండి 3 ఫేస్ AB స్విచ్ ద్వారా నిర్ణీత సమయము ప్రకారము వ్యవసాయ విద్యుత్ ఇవ్వబడుతున్నది.</p> <p>రాత్రి 06:00 గంటల నుండి ఉదయం 06:00 గంటల సమయము నందు వరకు 1 ఫేస్ ద్వారా సస్పెన్షన్ ఇవ్వబడుచున్నది 1 ఫేస్ సమయము నందు వ్యవసాయ DTRs నందు విద్యుత్ రాదు. కావున టైమర్ ఆవశ్యకత లేదు 1 ఫేస్ AB స్విచ్ ద్వారా విద్యుత్ సరఫరా చేయబడును.</p> <p>రైతులందరికి ట్రాన్స్ఫార్మర్ ఫ్యూస్ పోయినచో దయచేసి సంబంధిత విద్యుత్ సిబ్బందికి తెలియజేయగలరు, వారు వచ్చి సరిచేస్తారు.</p> <p>లైన్ మెన్ స్థాయి వరకు అధికార సెల్ నంబర్ ఇవ్వబడినది. లైన్ మెన్ స్థాయి నంబరు ప్రతి గ్రామ కార్యాలయములో ఈ నెంబరు తెలుపుటకు చర్యలు తీసుకొనబడుతున్నది.</p>

2.	<p>తెలంగాణ రాష్ట్రంలో రోజూ 2 లేక 3 రైతులు కరెంట్ షాక్ తో మరణించుచున్నారు. దీనిని ప్రధాన కారణం ట్రాన్స్ఫార్మర్ వద్ద ఫీజు పోవడం. రాత్రి మరియు పగలు ఇట్టి కరెంట్ లో ఫీజు పోయిన సమయం నకు కరెంట్ రాదు అని ఆత్మతలో రైతు స్థంభం ఎక్కి ఫీజు వేసే ప్రయత్నంలో ప్రాణాలు పోగొట్టుకుంటున్నారు. కావున 24 గం. కరెంట్ వదిలి ట్రాన్స్ఫార్మర్ వద్ద టైమర్ బిగించగలరు.</p>	<p>తెలంగాణ ప్రభుత్వ ఉత్తర్వుల ప్రకారం మరియు విద్యుత్ ఉత్పత్తి, వినియోగమును బట్టి వ్యవసాయ రంగానికి 7 గంటల విద్యుత్ ఇవ్వబడుతున్నది. రైతులందరికీ ట్రాన్స్ఫార్మర్ ఫ్యూజ్ పోయినచో దయచేసి సంబంధిత విద్యుత్ సిబ్బందికి తెలియజేయగలరు, వారు వచ్చి సరిచేస్తారు. లైన్ మెస్ స్థాయి వరకు అధికృత సెల్ నంబర్ ఇవ్వబడినది. లైన్ మెస్ స్థాయి నంబరు ప్రతి గ్రామ కార్యాలయములో ఈ నెంబరు తెలుపుటకు చర్యలు తీసుకొనబడుతున్నది.</p>
3.	<p>ప్రతి వ్యవసాయ విద్యుత్ కనెక్షన్ స్టార్టర్ డబ్బాలో లైటు సౌకర్యం కల్పించాలని గత ERC లో మీరు ఆర్డర్ ఇచ్చినప్పటికీ, ఇప్పటివరకు 98% న్యూట్రల్ వైర్ కనెక్షన్ ఇవ్వలేదు. వెంటనే అన్నింటికీ ఇప్పించవలసింది గా మనవి.</p>	<p>న్యూట్రల్ వైర్ అన్ని వ్యవసాయ కనెక్షన్లకు ఇవ్వాలంటే ఆ పని చాలా ఖర్చుతో కూడుకున్నది కాబట్టి ఆర్థిక వనరుల లబ్యత మేరకు న్యూట్రల్ వైరు ఇవ్వటానికి చర్యలు తీసుకొనబడును.</p>
4.	<p>సింగిల్ ఫేజ్ ట్రాన్స్ఫార్మర్ కు 6.3 kv న్యూట్రల్ సబ్ స్ట్రెషన్ నుండి అరేంజ్ చేయగలరు. దీని వలన ప్రతి ఏటా పశువులు; మనుషులు సెల్ చార్జింగ్ సమయంలో చనిపోవుతున్నారు. లోకల్ ఎర్త్ చేయడం వలన చనిపోవుచున్నారు. ERC రైడ్ లైన్స్ ఉన్నప్పటికీ కూడా సబ్ స్ట్రెషన్ నుండి సింగిల్ ఫేజ్ ట్రాన్స్ఫార్మర్ కు కనెక్షన్ ఇవ్వడంలేదు. ఇప్పటికీ చాలా మంది గ్రామీణ రైతులు; పశువులు చనిపోవడం జరిగింది. ఇట్టి ట్రాన్స్ఫార్మర్ లు అన్నింటికీ సబ్ స్ట్రెషన్ నుండి ఎర్టింగ్ కనెక్షన్లు ఇప్పించగలరు. క్రొత్తగా వేసిన వారికి ఎర్టింగ్ సబ్ స్ట్రెషన్ ల నుండి ఇప్పించగలరు.</p>	<p>టీ.ఎస్.ఎస్.పి.డి.సీ.ఎల్. పరిధిలోని అన్ని 1 ఫేజ్ ట్రాన్స్ఫార్మర్లకు ఎలాంటి ప్రమాదాలు జరగకుండా సరియైన ఎర్టింగ్ చేస్తున్నాము. విద్యుత్ ఉపాకేంద్రం నుంచి ప్రతి 1 ఫేజ్ ట్రాన్స్ఫార్మర్ కి న్యూట్రల్ వైర్ వేయుట చాలా ఖర్చుతో కూడుకున్నది. మొదటి వీడతగా సబ్స్ట్రెషన్ ఉన్న గ్రామములో న్యూట్రల్ వైరు పనులు పురోగతిలో ఉన్నవి.</p>
5.	<p>వ్యవసాయ భూముల నుండి కరెంట్ వైర్ లు డిపార్ట్ మెంట్ వారు తీసుకొని వెళ్లుచున్నారు (గత 40 సం.లుగా) దీనికి గాను రైతుకు ఎటువంటి లీజు / నష్ట పరిహారం ఇవ్వడం లేదు. పైగా ఇటువంటి వైర్ లు తెగిపడి రైతు తన పొలంలో చనిపోవుచున్నాడు. దీనికి పూర్తిగా డిపార్ట్ మెంట్ బాధ్యత వహించాలి.</p> <p>1. రైతు పొలం నుండి వెళ్లున్న, విద్యుత్ వైర్ లను నెలసరి అడ్డె చెల్లించవలెను.</p>	<p>ఎలక్ట్రిసిటీ ఆక్ట్ ప్రకారం విద్యుత్ లైన్స్ వెయబడుచున్నవి కాబట్టి లీజు చెల్లించబడదు. ఒక వేళ లైను వేయుసమయంలో పంట నష్టం జరిగినచో నిబంధనల ప్రకారం నష్టపరిహారం ఇవ్వబడును. విద్యుత్ వైర్లు తెగిపడి రైతు చనిపోవచో నిబంధనల ప్రకారం రూ.2 లక్షల నష్టపరిహారం</p>

	<p>2. ఇట్టి వైర్ లు తెగిపడి, రైతు చనిపోయినచో, మీ డిపార్ట్ మెంట్ లో సర్వోన్నతాధికారి మరణించినచో ఎటువంటి ఆర్థిక సహాయం ఇస్తారో, అటువంటి నష్ట పరిహారం చనిపోయిన రైతులకు ఇవ్వగలరా.</p>	<p>ఇవ్వబడును.</p>
<p>6.</p>	<p>పిల్లిమదురు (గ్రా) శంకర్ పల్లి (మ), రంగారెడ్డి జిల్లా లో 28.8.2014 న వ్యవసాయ ట్రాన్స్ఫార్మర్ ను దొంగ తనం నకు గురి అయినది. సంబంధిత AE గారు పోలీస్ స్టేషన్లో ఫిర్యాదు చేయడం జరిగింది. ట్రాన్స్ఫార్మర్ క్రింద రైతులు భీమ్ రెడ్డి, నారాయణ్ రెడ్డి, వెమ్ రెడ్డి, సురేందర్ రెడ్డి లు అనేక సార్లు సంబంధిత అధికారులను కలవడం జరిగింది. భారతీయ కిసాన్ సంఘం రంగారెడ్డి జిల్లా తరపున 11.1.2015 న DE గారికి, 20..2015 న SE గారికి ఫిర్యాదు చేయడం జరిగింది. దొంగిలించబడి 5 నెలలు గడచినా ట్రాన్స్ఫార్మర్ బిగించడం లేదు. జాప్యం నకు కారణమైన అధికారులపై DE ;SE గార్లు ఎటువంటి చర్యలు తీసుకోలేదు. ఇట్టి చర్య గమనించి పూర్తి దర్యాప్తు జరిపి తగు చర్య తీసుకొని, రెండు పంటలు నష్ట పోయిన ప్రతి రైతుకు (4గురికి) 2 లక్షల రూ. (2,00,000) నష్ట పరిహారం చెల్లించగలరు అని భారతీయ కిసాన్ సంఘం విన్నవించుకుంటుంది.</p>	<p>శంకర్ పల్లి సెక్షన్ నందు పిల్లిమదురు గ్రామంలో ట్రాన్స్ఫార్మర్ చోరీ జరగలేదు, ఈ సెక్షన్ నందు చందిప్ప మరియు శేరిగూడ గ్రామాలందు 2 ట్రాన్స్ఫార్మర్లు దొంగతనము జరిగినవి అదే రోజు కొత్త ట్రాన్స్ఫార్మర్లు ఏర్పాటు చేయబడినవి.</p>

S.No	Summary of Objections / Suggestions	Response of the Licensee
	23. గజేందర్, నాగారకుంట (గ్రా), షాబాద్ (మ), రంగారెడ్డి జిల్లా	
1.	CGRF మండల స్థాయి మీటింగ్ గూర్చి, డిపార్ట్ మెంట్ వారు రైతులకు తెలపడం లేదు. అట్టి కరపత్రాలు రైతులకు ఇవ్వడం లేదు. మీటింగ్ జరుగు రోజున ఉదయం దినపత్రికల్లో క్లుప్తంగా మీటింగ్ గూర్చి తెలుపుచున్నారు. కావున ఇట్టి CGRF మీటింగ్ ల గూర్చి 4, 5 రోజుల ముందు నుండి దిన పత్రికల్లో మీటింగ్ యొక్క ఉద్దేశ్యాన్ని విశదీకరిస్తూ వచ్చినట్లు చూపగలరు. (అవసరం అయితే ప్రకటన CGRF నిర్వహణ ఖర్చు ముందు పేపర్ ప్రకటన సూక్ష్మమైన ఖర్చు)	మీ సూచనను పరిశీలించబడును.
2.	22.6.2013 న పి. లింగా రెడ్డి అలియాస్ ప్రశాంత్, సాయి రెడ్డి గూడ (గ్రా), మొయినాబాద్ (మ), నివాసి ఇట్టి రైతు ప్రార్థన పోలం నకు వెళ్ళు సమయం న కరెంట్ వైర్ తెగిపడి అతని మెడకు తగిలి అక్కడే మృతి చెందడం జరిగింది. 21 సం. ల లింగా రెడ్డి చనిపోతే ఈ డిపార్ట్ మెంట్ వారు లక్ష రూ. (1,00,000) ఇచ్చి చేతులు దులుపుకోవడం ఎంత వరకు సమంజసం. ఇదే సంఘటన మీ డిపార్ట్ మెంట్ వారు ఎవరైనా జరిగితే, మీరు ఇచ్చే నష్ట పరిహారం లక్ష రూ. ఉంటుందా! కావున ఇప్పటికైనా కుటుంబంలో ఎదిగిన రైతుకు సరియైన నష్ట పరిహారం చెల్లించగలరు. ఇట్టి వైర్ లు తెగిపోయే ప్రమాదం జరిగే అవకాశం ఉంది అని 27/5/2013 న AE షాబాద్ గార్కి వినతి పత్రం ఇవ్వడం జరిగింది. ఇట్టి విషయం పై పూర్తి బాధ్యత జరిపి, అట్టి వారిపై తగు చర్యలు గైకోనగలరా. ఏమైనా చర్యలు తీసుకొనినట్లు జరిగితే మాకు తెలపగలరు.	మా నిబంధనల ప్రకారం ఒక లక్ష రూపాయలు చెల్లించడం జరిగినది. మా రికార్డుల ప్రకారం ఎలాంటి పీర్యాదు లేదు. కావున ఈ ప్రశ్న ఉదయించదు.

S.No	Summary of Objections / Suggestions	Response of the Licensee
24. K. Raghu, Coordinator, Telangana Electricity Employees Joint Action Committee, 108, A-Block, Vidyut Soudha, Khairatabad, Hyderabad.		
1.	<p>2.1 According to Section 64 (3) of the Electricity Act, 2003 licensees have to file application for determination for tariff one hundred and twenty days before the said tariffs come in to force. If the new tariff is to come in to force by 1st April 2015 application for new tariff should have reached the Commission by last week of November, 2014. TSDISCOMs are reported to have submitted ARR and Tariff on 7th February, 2015.</p>	<p>The delay in filings by the licensee is mainly due to :</p> <p>Consequent to the state bifurcation on June 2nd 2014, for TSSPDCL, two circles Anantapur & Kurnool has been demerged and reassigned to APSPDCL. As the MYT tariff order issued by the Commission includes ARR of Anantapur & Kurnool circles for TSSPDCL, it is required to revise the Distribution costs for 3rd control period for FY 2014-15 to FY 2018-19. Hence the licensees has to segregate the financial statements in the event of state bifurcation as it forms the basis for revision of the Distribution costs from FY 2014-15 to FY 2018-19 and also needs time for firming up power/fuel availability and cost thereof from various sources. Due to delay in preparation and receiving this information which would have a material impact on the overall ARR for the ensuing year and the measures to be adopted by the licensee in addressing it, the licensee is forced to submit the filings with delay so as to finalize the distribution costs and power purchase cost projections accurately.</p>
2.	<p>2.2 In the rush to come out with the tariff order by 23rd March the public has been denied sufficient time to scrutinize the filings of the DISCOMs. Under the new Act at least 30 days time should have been given to the public to respond in writing. The public shall be given at least 30 days time from the day of publication of new tariff proposals. According to the Public Notice issued on 11th February last date for filing suggestions/objections is 7th March and the first public hearing on tariff proposals will take place on 12th March. It is doubtful whether DISCOMs</p>	<p>The purpose of filing objections is to receive the comments of the consumers broadly about the claims made by the Discoms, thereby the Hon'ble Commission would be obligated to examine the said claims in detail from the stand point of the objections that was raised by consumer/s. No part of the existing regulations mandates requirement of thirty days time.</p> <p>However, the time given by the Hon'ble Commission is almost 1month which is reasonably sufficient to respond on the claims of</p>

	<p>will be in a position to go through the suggestions/objections filed send their responses to the public as well as the Commission in such a short time. While the public hearings will be over by 14th March the Commission is expected to come out with the Tariff Order by 23rd March, after due consultation with the Government of Telangana State regarding the quantum of subsidy available, for the new tariffs to be applicable from 1st April. Under such unseemly haste it is doubtful whether the Commission will be able to do justice to the sector in general and also balance interests of all stakeholders in the sector.</p>	<p>the Discoms.</p> <p>Further any delay in issuing the tariff order will cause loss of revenue to the Discoms, the hon commission is requested to issue the order such that the new tariff will be effeted from April 1st 2015.</p>												
<p>3.</p>	<p>3.1.1 According to the provisions of the Andhra Pradesh Reorganisation Act, 2014 Telangana State and residuary state of Andhra Pradesh have to share power generated by power plants located in both the states. An examination of the ARR and Tariff filings of TSDISCOMs and APDISCOMS shows that there is no common understanding between the two states in sharing the power generated in both the states. In fact differences and its impact are substantial. The following table summarises these differences:</p> <table border="1" data-bbox="303 894 1499 1414"> <thead> <tr> <th data-bbox="303 894 526 959">Issue</th> <th data-bbox="526 894 1018 959">Telangana State DISCOMs</th> <th data-bbox="1018 894 1499 959">Andhra Pradesh DISCOMs</th> </tr> </thead> <tbody> <tr> <td data-bbox="303 959 526 1138">APGENCO thermal units – DSTPP</td> <td data-bbox="526 959 1018 1138">Claimed 53.89% power</td> <td data-bbox="1018 959 1499 1138">Claimed 100% power</td> </tr> <tr> <td data-bbox="303 1138 526 1276">TSGENCO units – KTPP II</td> <td data-bbox="526 1138 1018 1276">Claimed 53.89% power</td> <td data-bbox="1018 1138 1499 1276">Did not claim any power</td> </tr> <tr> <td data-bbox="303 1276 526 1414">Inter state Hydel units</td> <td data-bbox="526 1276 1018 1414">Claimed 41.68% (population percentage) citing provisions of AP Reorganisation Act.</td> <td data-bbox="1018 1276 1499 1414">Claimed 100% power</td> </tr> </tbody> </table>	Issue	Telangana State DISCOMs	Andhra Pradesh DISCOMs	APGENCO thermal units – DSTPP	Claimed 53.89% power	Claimed 100% power	TSGENCO units – KTPP II	Claimed 53.89% power	Did not claim any power	Inter state Hydel units	Claimed 41.68% (population percentage) citing provisions of AP Reorganisation Act.	Claimed 100% power	<ul style="list-style-type: none"> • In accordance with the Clause C (2) of schedule XII of the AP Reorganization Act and as per G.O.Ms.No.20, DT: 08.05.2014, the allocation of power generated from the existing and the ongoing power plants located in both the states should be in the ratio of 53.89% & 46.11% respectively for Telangana and Andhra Pradesh. • Government of Telangana on behalf of TSDISCOMs have already submitted its views on the sharing of the power from both the Central Generating Stations and as well as the State owned Power Generating stations located in AP & Telangana states, before the Committee constituted by MoP, Govt of India, under the chairmanship of Chairperson/CEA, to resolve the issues cropped up post state bifurcation between the TSDISCOMs and APDISCOMs. Decision of the Committee is awaited.
Issue	Telangana State DISCOMs	Andhra Pradesh DISCOMs												
APGENCO thermal units – DSTPP	Claimed 53.89% power	Claimed 100% power												
TSGENCO units – KTPP II	Claimed 53.89% power	Did not claim any power												
Inter state Hydel units	Claimed 41.68% (population percentage) citing provisions of AP Reorganisation Act.	Claimed 100% power												

	Genco Hydel units	Claimed 53.89% from units located in AP as well as Telangana	Claimed 100% power from hydel units located in AP and did not claim power from units located in Telangana		
	Central Generating Stations	Claimed 52.11% instead of 53.89% citing draft recommendations of CEA	Claimed 46.11%		
	IPPs - Hinduja	Claimed 53.89% power	Claimed 100% power		
	NCE - Wind	Claimed power from wind energy plants located in Anantapur and Kurnool districts of AP	Claimed 100% power		
	<p>3.1.2 DISCOMs of both the states differ on total quantum of power available from each plant. For e.g., according to TSDISCOMs estimate power available from Dr NTTPS units I, II and III will be about 8,057 Mu and according to APDISCOMs it will be about 7,554 MU. Similarly, DISCOMs of both the states also differ on estimation of fixed cost burden from each plant.</p>				
4.	<p>3.1.3 TSDISCOMs in their filings submitted that generation tariffs based on the Generation Regulation are yet to be determined. This is particularly the case with state owned GENCOs. In the background of AP Reorganisation Act, 2014 the question arises as to who will determine the tariff for GENCO power plants? If it is the SERCs which determine tariffs then the next question will be which SERC will determine which plant's tariff. If the role devolves on CERC as the plants become inter state plants one would like to know the steps taken by the GENCOs as well as DISCOMs in getting CERC's approval for PPAs for these plants. Similar questions also arise in the case of tariff determination for HNPCL plant at</p>			<p>Telangana discoms will take appropriate steps as per the AP Re Organization act.</p>	

	Visakhapatnam and APPDC's DSTPP at Krishnapatnam.	
5.	3.1.4 Even when the Chief Minister of Telangana state is saying that the state has to endure power shortages for the next three years TSDISCOMs filings show that the state will have 8,150 MU of surplus power at its disposal. Similarly, according to APDISCOMs' filings AP will have 11,000 MU of surplus power. This anomalous situation arises due to the above differences in views related to power sharing and consequent estimation of power availability.	TSDISCOMS have projected the energy availability from various energy sources as per the AP Reorganization Act and as per best estimates of parameters like coal availability, maintenance schedules, PLF etc. from existing stations as well as upcoming stations of Andhra Pradesh like Krishnapatam, Hinduja etc. If these stations achieve CoD as per the projection of ARR and share power with Telangana as per AP Re organization Act, this would result in the Energy surplus scenario as projected in the ARR
6.	3.1.5 Without settling these issues it will not be possible to estimates the costs in supplying power to the consumers in both the states and also determine tariffs. One way to solve this is for the ERCs of AP and TS sit together evolve a mechanism. But the outcome from such exercise may not be acceptable to some on either side of the dispute. Another way is for the two state governments solve this through discussions. Under the present circumstances it may not be possible. Under the AP Reorganisation Act the central government has powers to arbitrate in the disputes between the two states and give directions. Part of this work is already done through a draft report submitted by CEA. TSERC may write to the Government of India to settle this issue preferably well before the Commission comes out with the tariff order for the ensuing year.	It is not under purview of Licensee
7.	<u>Why energy from IPPs not considered after PPA term?</u> 3.2.1 DISCOMs estimated power availability from GVK plant up to June 2015 and from Lanco up to December 2015 due to expiry of PPAs with these power developers. Due to this TSDISCOMs will be losing about 580 MU power. As the gas allocation to these plants continues and these plants	TSDISCOMS have considered energy availability from gas based IPPS only till the PPA expiry date. Considering the low gas availability which has forced the IPPS to run at PLFs as low as 20%, Considering that long term sources are being planned in Telangana by TSGENCO and SCCL which are expected to be cheaper sources and higher cost of power generation from gas IPPs, TSDISCOMS have not considered energy availability from

	<p>continue to generate power TSDISCOMs shall get their share of power from these plants after the above dates also.</p> <p>3.2.2 At the same time we also would like to know the steps taken by the TSDISCOMs to extend these PPAs or take over these plants on completion of PPA terms.</p> <p>3.3 Also, in the background of additional power to the extent of 450 MW being made available to both the states combined together from gas based power plants (TS share expected to be 242 MW) following change in gas allocation policy of GoI, whereby some of the gas allocated to fertiliser plants being diverted to gas based power plants in AP, and additional power being available during summer shall be taken in to account while computing total power available to the state.</p> <p>3.4 Newspaper reports indicate that TSDISCOMs are planning to generate power from the gas based power plants using LNG/Naphtha. But the same does not appear in the present filings. DISCOMs are requested to clarify on quantum of power proposed to be generated using these fuels and its implication for cost of power procurement.</p>	<p>these stations</p> <p>TSPCC is making arrangement towards additional generation with RLNG (by way of swapping with KG D6 gas) and also with Naptha. TSPCC appraised the GoI about the power deficit that is being faced by the Telangana state and requested for allotment of 5 MMSCMD RLNG (under swapping arrangement with KG D6 gas) for additonla generation of 1000 MW. The GoI and Minsitry of Fertilisers accepted to swap 2.4 MMSCMD of gas with RLNG which will generate 450 MW approx.. out of which TSdiscoms share will be around 240 MW. Similarly TSDiscoms are making arrangements to fire Naptha as alternate fuel by issuing dispatch instructions to IPPs like Spectrum Power generation Ltd., Lanco kondapalli power ltd., and GVK industries ltd. (GVK stage-I) depending upon the grid constraints for an additional generation of 250 MW (for TSDiscoms only)</p>
9.	<p>Power purchase costs – fixed costs</p> <p>4.2.1 Draft PPAs of KTPS VI, KTPP I and KTPP II units of TSGENCO are pending before the Commission since 2009. Delay in disposing petitions related to these PPAs is one of the reasons for the prevailing confusion in allocation of plants between AP and Telangana. It is high time the Commission finalises them through public process.</p>	<p>Not in purview of discom</p>

10.	<p>4.2.2 Hinduja National Power Corporation Limited was selected in 1990s under fast track projects. PPA with it was entered in to by erstwhile APSEB in 1998. It was provided with sovereign guarantee. Along with this conditions were also laid that its cost shall be equal to NTPC's Simhadri unit II. As there was inordinate delay in setting up the project even after fuel linkage liquidated damages shall be collected form it as provided under the 1998 PPA. Reports indicate that changes are being made in this PPA. The same shall be examined through public hearings.</p>	<p>MoA was entered on 17-05-2013 by the erstwhile APDISCOMs with M/s HNPCL for entering amendments to the existing PPA in line with the Regulations and EA2003. As per the MoA , the Draft amendments are prepared by the both parties and discussed during the meetings with M/s HNPCL. The proposed amendments are sent to M/s HNPCL for their comments. After finalization of the draft amendments, same will be submitted to ERC for approval.</p>															
11.	<p>Fixed costs of GENCO plants</p> <p>Capital Costs of GENCO New Plants, (Rs/U)</p> <table border="1" data-bbox="306 659 897 964"> <thead> <tr> <th>Station</th> <th>Capacity MW</th> <th>Fixed Cost</th> </tr> </thead> <tbody> <tr> <td>KTPS VI</td> <td>500</td> <td>1.79</td> </tr> <tr> <td>KTPP I</td> <td>500</td> <td>1.79</td> </tr> <tr> <td>KTPP II</td> <td>600</td> <td>2.25</td> </tr> <tr> <td>UMPP Mundra</td> <td>- 4000</td> <td>0.98</td> </tr> </tbody> </table> <p>4.2.3 Several new thermal power plants are in operation in the state. These include KTPS – VI, KTPP – I, and KTPP – II. In the above table except the last one all other plants are set up by TSGENCO. Though they are already in operation PPAs with them are not yet cleared by the Commission. They are pending before the Commission for more than four years. Even then the Commission is allowing the DISCOMs to procure power from these plants. Moreover DISCOMs in their filings are claiming that they are adopting fixed costs as approved by the Commission. According the norms/regulations in operation after the enactment of power sector reform Acts both at state and central level at the first stage PPA between the generating company and distribution licensee shall be approved by the Commission followed by financial closure. After this</p>	Station	Capacity MW	Fixed Cost	KTPS VI	500	1.79	KTPP I	500	1.79	KTPP II	600	2.25	UMPP Mundra	- 4000	0.98	<p>Not in purview of discom</p>
Station	Capacity MW	Fixed Cost															
KTPS VI	500	1.79															
KTPP I	500	1.79															
KTPP II	600	2.25															
UMPP Mundra	- 4000	0.98															

	erection of plant and machinery starts and COD needs to be declared before the distribution licensee starts receiving power from the generating station. All these steps are skipped in the case of the new GENCO plants. Though the draft PPAs are with the Commission for more than four years the Commission could not find time examine these PPAs.	
12.	4.2.4 Fixed costs of these new thermal power plants are high. Compared to the Ultra Mega Power Plant at Mundra in Gujarat set up by Tatas and which started power generation the fixed costs of the above plants proved to be very high. The fixed costs of these plants are higher by more than 75% to 100%.	UMPP from economies of scale and tax benefits tend to have a lower cost per unit. Also Fixed cost per unit changes every year with increase in O&M expenses, reduction in loan amount, reduction in interest cost. Hence, the Fixed cost of new stations coming up in Telangana & AP cannot be compared to UMPP.
14.	<p>Variable/Fuel cost</p> <p>4.3.1 DISCOMs propose to adopt variable cost escalation of 2%. In case there is any change in fuel prices during the ensuing year the same may be addressed through the existing regulation or Fuel Surcharge Adjustment (FSA) may be reintroduced. There is no need to adopt the proposed variable cost escalation.</p> <p>4.3.2 Variable cost of power from Hinduja National Power Corporation Limited's plant is estimated to be Rs. 1.86 per unit. Compared to this variable cost of power from NTPC's Simhadri units is estimated to be Rs. 2.60 per unit. While source of fuel (coal) for both the plants is the same (Mahanadi Coal Fields) NTPC's units' variable cost is higher by nearly 40%. This needs to be looked in to.</p> <p>4.3.3 Variable cost of KTPS VI unit (Rs.2.73 per unit) is higher than other units located at Kothagudem. This is because of allocation of coal from Mahanadi Coal Fields rather than from Singareni units. As swapping/rationalisation of coal allocation is in operation KTPS VI unit</p>	<p>3. It is to be noted all thermal stations run predominantly on thermal coal supplied from domestic sources like MCL, SCCL etc. while imported coal is been used only in case of domestic coal shortfall.</p> <p>With increase in rail freight rates for coal by 6.3% and increase in green cess to Rs. 200 per metric tonne, the cost of coal is expected to increase significantly which would increase the variable cost of production</p> <p>Still, TSDISCOMS have taken a conservative estimate and projected the increase in variable cost only by 2%. TSDISCOMS request Hon'ble Commission to consider this nominal escalation</p> <p>4. Variable cost of plant depends on the coal mine from which coal is tapped, transportation charges which might include rail, road, seafreight charges. Additionally, factors like efficiency of the power plant, consumption of secondary oil, washing of coal would impact the variable cost of power production. Hence, even though the power plants are located at the same venue, it need not be necessary that the variable cost is same</p>

	<p>shall also get its fuel from Singareni units. This will help to bring down cost of power from this unit.</p>	<p>The Variable Cost of Simhadri STPS is considerably high when compared to the Variable Cost of HNPCL as 40 % of required Coal is being imported for the Simhadri STPS.</p> <p>The NTPC is using 60 % of indigenous Coal and 40% of imported Coal for the Simhadri Super Thermal Power Station in view of the shortage of indigenous Coal.</p> <p>The HNPCL has yet to start generation and Variable Cost arrived by HNPCL is based on 100 % of indigenous Coal</p> <p>Originally KTPS-Vi stage is totally linked to Ms Mahanadi coal fields Ltd. To an extent of 2.31 million tonnes per annum. Ministry of Coal, GoI has swapped the coal linkage from MCL to SCCL. Fuel supply agreement will be entered with the SCCL for supply of Coal to this unit.</p>
15.	<p>4.3.4 Use of imported coal continues to be source of concern, both in terms of price as well as quality. Following objections raised by the public during public hearings the Commission has given several directions in the case of utilisation of imported coal by central generating stations as well as APGENCO units. TSDISCOMs in their replies in response to these directions merely mentioned that TSGENCO plants would not be using imported coal. Under the provisions of the AP Reorganisation Act TSDISCOMs also will be accessing power from CGS and APGENCO thermal units which are using imported coal. In this regard TSDICOMs also need to pay attentions to the directives issued by the Commission related to utilisation of imported coal.</p>	<p>TSDISCOMS would adhere to the directives issued by the Hon'ble Commission</p>

17.	<p>4.3.6 One of the important reasons for increase in power purchase costs is hike in natural gas price by the central government. Price of natural gas increased from \$ 4.2 per MBTU to \$ 5.61 per MBTU. Following this variable cost of power produced from gas based power plants increased.</p> <p>Variable Cost Rs/U</p> <table border="1" data-bbox="303 431 924 797"> <thead> <tr> <th>Plant</th> <th>2013-14</th> <th>2015-16</th> </tr> </thead> <tbody> <tr> <td>GVK</td> <td>2.19</td> <td>2.62</td> </tr> <tr> <td>Spectrum</td> <td>2.48</td> <td>2.76</td> </tr> <tr> <td>Lanco</td> <td>2.25</td> <td>3.02</td> </tr> <tr> <td>Reliance</td> <td>1.64</td> <td>3.44</td> </tr> </tbody> </table>	Plant	2013-14	2015-16	GVK	2.19	2.62	Spectrum	2.48	2.76	Lanco	2.25	3.02	Reliance	1.64	3.44	Noted
Plant	2013-14	2015-16															
GVK	2.19	2.62															
Spectrum	2.48	2.76															
Lanco	2.25	3.02															
Reliance	1.64	3.44															
18.	<p>4.3.7 The new natural gas price adopted by the GoI goes against the norms of price fixation, against the PSC and also orders of the Supreme Court. This shall not be allowed. As the consumers of Andhra Pradesh will be severely adversely affected by this DISCOMs and GoAP/GOTS should have taken initiative to see that this price is rolled back. These should have explored all avenues to bring down this price, including approaching the Supreme Court. As variable costs are pass through DISCOMs are least bothered about this burden on the consumers. In the meantime E.A.S Sarma, former Secretary, GoI and Gurudas Dasgupta filed a petition in Supreme Court challenging the above gas price. We request the TSDISCOMs and the GoTS to implead in this case before the Supreme Court. This request is not a misguided one given the APERC's observations in its Order on GVK that DISCOMs will take care of consumers' interests.</p>	Noted															

19.	<p><u>How short term purchases are made without regulatory approval?</u></p> <p>4.4 During the FY 2014-15 TSDISCOMs procured 8,713 MU through short term/market purchases constituting nearly 18% of the power procured in the state. Most of this power is procured without regulatory approval and in a non-transparent manner. Even when additional demand was only during peak period power through short term purchases was procured under round the clock (RTC) terms. Because of this during non-peak periods in order to accommodate short term purchases made under RTC terms cheaper GENCO plants were being backed down. This led to unnecessary burden on TSDISCOMs and in turn on consumers in the state. TSDISCOMs as the filings show will be procuring power through short term purchases during 2015-16. Also, state leadership is exhorting DISCOM officials to procure power at any cost. Keeping past experience in mind short term purchases shall be made in an optimum manner, specifically to meet peak deficits, but not on RTC terms.</p>	<p>During FY 14-15, energy requirement has been significantly higher than the energy availability. Also due to a bad monsoon year, Hydel energy availability has significantly reduced. To fulfil the promise of providing 7 hours of supply to Agriculture consumers, TSDISCOMS had to resort to power purchase from Short term sources</p>
20.	<p>5.1 Financial Restructuring Plan (FRP) is introduced by the GoI in the name of ensuring the financial viability of the DISCOMs. Though introduced by it the GoI does not take any financial responsibility of ensuring the financial viability of the DISCOMs. According to this Plan the state government will stand guarantee to the bonds issued to cover 50% of the accumulated losses. From DISCOMs' filing it is not clear whether the State Government will repay the bonds or DISCOMs have to pay them and in case of their default only the State Government will come in to the picture. Apart from this, the bonds issued by the state government covers only 40% of the accumulated losses, not 50%as envisaged in the Plan.</p>	<p>The State Govt is required to take over 50 % of the outstanding short term liabilities (STL) corresponding to the accumulated loss as per audited accounts of the DISCOMs as of March 2013 , the cutoff date for implementation of FRP in combined State . Initially Bonds are issued by the DISCOMs and GoTS will take over the bonds in two to five years depending upon its fiscal space. DISCOMs are taking up the issue of taking over the bonds by GoTS. Interest and repayments of bonds is the liability of GoTS. Further, GoTS has already paid Rs227 Crs interest on bonds relating to first half of FY2014-15.</p>
21.	<p>5.2 According to the TSDISCOMs' filings the remaining 60% losses need to be structured as loans with a three moratorium for paying principal amount. The two DISCOMs propose to convert losses to the extent of Rs.</p>	<p>The details of losses and contribution of each components is already enclosed in the Director's Report of the company Annual accounts 2012-13 which is again reproduced below <i>"During the Financial Year 2012-13, Company has incurred a</i></p>

<p>2,450 crore in to short term loans, constituting only 40% of their burden. Then, what will happen to the remaining 60% of their loss burden?</p>	<p><i>Business Loss of Rs. 7718.29 Crores which include operational loss of Rs.2078.04 crores. The operational loss is due to increased power purchase costs. And the GoAP has not subsidized in total the Expensive Power purchases and the interest paid for Rs. 790.13 Crores on Short Term Loan drawn for purchase of Expensive Power during the Financial Year 2012-13 which also resulted in loss for the current financial year 2012-13. Apart from the above the Company had written off unapproved Fuel Surcharge Adjustment [FSA] by Honourable APERC for FY 2009-10 to 2011-12 amounting to Rs. 948.17 Crores. During the year the Company had also made provisions towards unbilled and uncollected FSA of Rs. 637.81 Crores for the period 2009-10 to 2010-11 (1st Quarter) due to stay on FSA billing and collections as per the Orders of Honourable High Court, and Government receivables to the extent of Rs. 181.23 crores which are due towards Single Bulb subsidy, Tatkal Subsidy and Subsidy receivable from Government in support of Third Transfer Scheme in respect of taking over of REC Loan and Vidyut bonds. The Government receivables towards addition power subsidy of Rs. 3877.87 Crores have been provided as doubtful. The above provisions have been made due to non commitment by GoAP, non receipt of subsidy from GOAP and there being no provision in budgetary support for Government subsidy towards additional power during F.Y.2013-14. The Company had also made provision for Rs. 82.13 Crores towards the RESCOs absorption of Assets and Liabilities and Certain Fixed Assets of RESCOs have been written as their net book value is unrecognized. The above provisions were made as there was no commitment received from the Government, regarding these receivables. All the above factors have resulted in the net accumulated losses of Rs. 7829.81 crores. Because of the increased accumulated losses the net worth of Company as on 31.03.2013 is showing a negative balances of Rs. 5315.83 crores. The losses are recoverable through true-up mechanism in Tariffs of ensuing years, and the Financial Restructuring package to be</i></p>
---	---

		<p><i>implemented by Government of Andhra Pradesh.”</i></p> <p>DISCOMs have raised STL to meet expensive power purchase cost, increase in power purchase cost due to inflation and cost associated delayed collection of FSA etc. The GoAP/GoTS had agreed to take over their commitment towards expensive power purchase.</p> <p>Accordingly, 50% of STL will be taken over by GoTS as per scheme and balance 50% of STL is due to the</p> <p>1) Restriction of T&D losses to the extent of approved losses while approving FSA ,</p> <p>2) Restriction of agriculture consumption to the extent of approved quantity in the T.O in the FSA orders Eventually led to Difference of FSA between filed and approved by the Hon’ble APERC for the FY 2011 to 2013.</p> <p>The scheme basically meant to make DISCOMs financially viable and to restructured the short term loans and GOI proposed that, the 50% of STL shall be issued in the form of bonds to Banks. The bonds will be repaid by GoTS along with interest.</p> <p>The scheme proposes to restructure the balance of Short terms Loans to the extent of 50% of Short term loans outstanding as on 31-03-2013. The interest and repayment of restructured loans will be the commitments of DISCOMs.</p>
22.	<p>5.3 TSDICOMs submitted, “The key components of above losses are unapproved portion of Fuel Surcharge Adjustment (FSA) for the years 2009-10 to 2011-12, FSA cases pending in courts and Govt receivables over and above Rs. 4,553.85 Crs which is agreed by Govt as final settlement”. Apart from the DISCOMs did not provide any details on the sources of these accumulated losses. Unapproved FSA amounts cannot be recovered without sanction from the TSERC and the Courts in question.</p>	<p>a) The details of losses and contribution of each components is already enclosed in the Director’s Report of the company Annual accounts 2012-13 which is again reproduced below</p> <p><i>“During the Financial Year 2012-13, Company has incurred a Business Loss of Rs. 7718.29 Crores which include operational loss of Rs.2078.04 crores. The operational loss is due to increased power purchase costs. And the GoAP has not subsidized in total the Expensive Power purchases and the interest paid for Rs. 790.13 Crores on Short Term Loan drawn for purchase of Expensive Power</i></p>

<p>Again in the case of TSERC, it cannot approve the pending FSAs without following the public process as mandated by the High Court in earlier cases. The above passage also mentions Govt receivables. From this it is not clear whether these are receivable by Govt from DISCOMs or by DISCOMs from Govt. In fact it should be receivables by DISCOMs from Govt. In the past the state government directed the DISCOMs to purchase power from market at high prices assuring that it will bear higher the expenditure. The DISCOMS also mentioned,” The bonds issued cover the expensive power purchased by the TS DISCOMs for the period 2008-09 to 2013-14.” (p.50 SPDCL Filing) After that it reneged on its assurance. According to the MYT framework surplus/deficit need to be analysed at the end of the control period in detail before approving the same. But it was not done in the case of first as well as second control periods. In the background of the above we request the Commission not to approve the above interest cost and direct the DISCOMs to make all information related to the above public.</p>	<p><i>during the Financial Year 2012-13 which also resulted in loss for the current financial year 2012-13. Apart from the above the Company had written off unapproved Fuel Surcharge Adjustment [FSA] by Honourable APERC for FY 2009-10 to 2011-12 amounting to Rs. 948.17 Crores. During the year the Company had also made provisions towards unbilled and uncollected FSA of Rs. 637.81 Crores for the period 2009-10 to 2010-11 (1st Quarter) due to stay on FSA billing and collections as per the Orders of Honourable High Court, and Government receivables to the extent of Rs. 181.23 crores which are due towards Single Bulb subsidy, Tatkal Subsidy and Subsidy receivable from Government in support of Third Transfer Scheme in respect of taking over of REC Loan and Vidyut bonds. The Government receivables towards addition power subsidy of Rs. 3877.87 Crores have been provided as doubtful. The above provisions have been made due to non commitment by GoAP, non receipt of subsidy from GOAP and there being no provision in budgetary support for Government subsidy towards additional power during F.Y.2013-14. The Company had also made provision for Rs. 82.13 Crores towards the RESCOs absorption of Assets and Liabilities and Certain Fixed Assets of RESCOs have been written as their net book value is unrecognized. The above provisions were made as there was no commitment received from the Government, regarding these receivables. All the above factors have resulted in the net accumulated losses of Rs. 7829.81 crores. Because of the increased accumulated losses the net worth of Company as on 31.03.2013 is showing a negative balances of Rs. 5315.83 crores. The losses are recoverable through true-up mechanism in Tariffs of ensuing years, and the Financial Restructuring package to be implemented by Government of Andhra Pradesh.”</i></p> <p>2) Since, the discoms are claiming the interest on STL restructured loans which is the part of FRP scheme, the restructured loan is the liability of DISCOMs as per scheme and the DISCOMs can only pay</p>
---	--

		the debt service on the restructure loans through ARR .There is no additional resources to meet the debt servicing cost of DISCOMS. DISCOMS are only claiming interest and will claim the repayments of EMI from the beginning of 4 th year of FRP implementation. The soft copy of FRP scheme approved by the GoAP can be shared with hon'ble objectors as desired by them.										
23.	6.1 TSDISCOMs claim Rs. 1,463.30 crore under true up for the FY 2013-14 and 2014-15. But they do not provide any justification for the same. Even whatever information provided by them is confusing. TSSPDCL in its filing (pp.50-51) mentioned revenue of Rs. 13,295 crore for the year 2013-14 and supply cost of Rs. 11,865 crore, but mentioned the difference between the two (true down) as Rs. 161.74 crore.	<p>In the flings the supply cost of Rs. 11865 crores is the retail supply cost. But to arrive at the Retail supply gap alone, the revenue from the distribution business consumers has to be considered as the same as the Tariff order value. Hence the Gap of Rs. 161.74 crores arrived for TSSPDCL after netting of the approved distribution cost.</p> <p style="text-align: right;">Rs in cr</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td>Supply cost</td> <td>11865</td> </tr> <tr> <td>Revenue</td> <td>13295</td> </tr> <tr> <td>Gap</td> <td>-1430</td> </tr> <tr> <td>Distribution cost</td> <td>1269</td> </tr> <tr> <td>Net gap</td> <td>-161</td> </tr> </table>	Supply cost	11865	Revenue	13295	Gap	-1430	Distribution cost	1269	Net gap	-161
Supply cost	11865											
Revenue	13295											
Gap	-1430											
Distribution cost	1269											
Net gap	-161											
24.	6.2 One of the important reasons for this revenue gap is higher fuel costs. According to a recent report of CAG (see Annexure I) Reliance Industries Ltd received higher price than allowed. According to this report, "As per the price discovery process undertaken by the operator (RIL)... it was categorically indicated that selling price would be rounded off to two decimal points... A review of records relating to sales of gas to consumers, however, revealed that the operator has been charging the gas price at the rate of \$4.205 per unit (three decimal points) from its consumers in place	Noted										

	<p>of USD 4.20 per mmBtu, arrived at after rounding of 2 decimal points". The draft of the second audit of the field's books, submitted by the Comptroller and Auditor General to the oil ministry for comments, says Reliance was charging consumers by rounding off the price in three decimal units against the norm of two decimal units, leading to excess billing of \$9.68 million in the first four years of production beginning 2009-10. TSDISCOMs shall be directed to recover the excess amount paid and to that extent true up amount shall be brought down.</p>	
25.	<p>6.3 According to newspaper reports (See Annexure II) the Directorate of Revenue Intelligence has unearthed a scam involving companies inflating the value of coal imports from Indonesia for their power plants. Initial estimates by the agency pegged the overvaluation at Rs 29,000 crore in the period 2011-2014. DRI has raided over 80 shipping companies, intermediaries and laboratories across the country including, Andhra Pradesh in search of documents that show the real value of the imports. Almost all laboratories testing coal in India have been searched by the DRI to obtain the lab reports for verification of the calorific value of the imported coal. According to this investigation almost every importer, including the reputed corporate – public and private, have indulged in overvaluation of coal imports. DRI is learnt to have recovered documents showing the real value of the imports. The overvaluation has an impact on the tariff paid by consumers here as power companies could have a higher tariff fixation based on the inflated rates. It was estimated that the power tariff would be less by Re 1 per unit if the value of imported coal value was not inflated. In the past during public hearings objectors have pointed out many anomalies in imported coal including higher prices. As this is upheld by the investigation of DRI we request the Commission not to allow the true up demanded by DISCOMs to the extent of over valuation of imported</p>	Noted

	coal.																	
26.	<p>Estimation of agriculture consumption (MU)</p> <table border="1"> <thead> <tr> <th></th> <th>2013-14</th> <th>2014-15</th> <th>2015-16</th> </tr> </thead> <tbody> <tr> <td>NPDCL</td> <td>4348</td> <td>4715</td> <td>4904</td> </tr> <tr> <td>SPDCL</td> <td>6694</td> <td>7238</td> <td>7528</td> </tr> <tr> <td>Total</td> <td>11042</td> <td>11953</td> <td>12432</td> </tr> </tbody> </table> <p>7.1 Filings of NPDCL as well as SPDCL show that power consumption in the agriculture sector in Telangana is increasing irrespective of the situation on the ground. The above consumption figures are arrived at by the DISCOMs on the basis of their claim that they are supplying power for 7 hours per day (p.64, SPDCL). This is far from truth. Most of the time, farmers are not receiving not even four hours of supply in a day. As such the Commission shall not take the above consumption figures in to account.</p>		2013-14	2014-15	2015-16	NPDCL	4348	4715	4904	SPDCL	6694	7238	7528	Total	11042	11953	12432	<p>During the year 2014-15 the discoms have supplied 3 phase agl supply to the farmers 6 to 7 hours per day based on the availability of power. Hence the projection for the yr 2015-16 is made taking in to the consideration of extending seven hours three phase supply to the farmers.</p>
	2013-14	2014-15	2015-16															
NPDCL	4348	4715	4904															
SPDCL	6694	7238	7528															
Total	11042	11953	12432															
27.	<p>7.2 The fact that the agriculture consumption figures provided by the DISCOMs are anomalous comes out from their filings. According to their filings while 9,78,028 pump sets under SPDCL will be consuming 7,528 MU during 2015-16, under NPDCL 10,73,870 pump sets will be consuming 4,904 MU. In other words per pump set consumption will be 7,528 units under SPDCL, it will be 4,567 units in the case of NPDCL. Per pump set consumption in SPDCL will be nearly 70% higher compared to NPDCL, even while hours of supply of electricity are the same under both DISCOMs.</p>	<p>The agl consumption is assessed based on the ISI methodology approved by Hon commission. The agl consumption may vary from District to District based on the drought conditions in the respective districts.</p>																
28.	<p><u>Agriculture consumption during 2013-14</u></p>	<p>The average consumption per pump set will depend on capacity of the pump set with & without DSM measures.</p>																

Particulars	NPDCL	SPDCL
Pump sets with DSM	9,75,729	10,93,743
Pump sets without DSM	3,086	5,275
Energy consumed by Pump sets with DSM (MU)	4,355.6	9157.93
Energy consumed by Pump sets without DSM (MU)	5.77	32.19
Average consumption of Pump sets with DSM (U)	4,464	8373
Average consumption of Pump sets without DSM (U)	1,870	6102

7.3 According to the above table 99% of the farmers with pump sets in Telangana have adopted DSM measures. The electricity consumption figures provided for pump sets with and without DSM measures also gives rise to doubts about the way agriculture consumption figures are provided. On the average pump sets with DSM measures consumed more power than the pump sets without DSM measures. In the case of NPDCL average consumption of pump sets with DSM measures was 4,464 units in an year compared to 1,870 units by pump sets without DSM measures. In the case of SPDCL average consumption of pump sets with DSM measures was 8,373 units in an year compared to 6,102 units by pump sets without DSM measures. This totally goes against the prevailing understanding on DSM measures as well as report on a pilot reported by TSSPDCL.

	DISCOMs are requested to clarify.	
29.	7.4 Subsidy towards free power to agricultural services is being provided on the basis of 7 hours of power supply to these services. But in reality farmers are getting power for less than five hours. This implies that DISCOMs were compensated more than necessary to supply free power to agriculture. The excess subsidy paid to DISCOMs in this regard shall be recovered.	The Hon commission approved sales for agriculture for the FY 2013-14 is 8073.7 mu. As against this the actual agl sale as per ISI methodology approved by Hon commission is 9190.49 mu. The power purchase cost for agricultural supply is more than the ERC approved. Hence the discom has not received any excess subsidy from the govt
30.	7.5 In the absence of metering of agricultural connections DISCOMs claimed that they have arrived at these figures following the ISI methodology suggested by the Commission. But data collected under this methodology is also not complete. To overcome this we suggest that all DTRs serving the agriculture services should be metered so that the consumption estimates are realistic. The Task Force on electricity Sector appointed by the Government of Telangana State also suggested metering of DTRs serving agriculture loads.	<p>Indian Statistical Institute (ISI) presented a new methodology for assessing agricultural consumption. The methodology picked up (2245 Nos.) samples from the population of Agl. DTRs for TSSPDCL (for six circles i.e. Mahabubnagar, Nalgonda, Medak, RR East, RR North & RR South). The sample is dynamic. (i.e.) over a period of six months, locations for 10% of the sample DTRs in each circle are to be changed, for effective implementation. As directed by the Regulatory Commission, meters were installed for 10% of sample size (i.e. 225 Nos.) in addition, so as to increase the number of valid DTRs to be considered for assessment of consumption. Since the metering is done on the LV side of the agricultural DTRs, the assessed consumption as per the procedure includes the consumption of unauthorized agricultural services also. The assessment of agricultural consumption as per the ISI methodology is done every month and is filed with the Hon'ble TSERC.</p> <p>It is difficult to meter all the DTRs serving to agricultural connections. The agricultural DTR meters are exposed to atmosphere hence more chances to damage of meters. This results in is loss of revenue and not practical.</p> <p>However the methodology now being followed is scientific and</p>

		approved by Hon'ble TSERC.													
31.	<p>7.6 In the past the Commission (Fresh Directive No. 2 of the Tariff Order for FY 2011-12) directed the DISCOMs to furnish meter-wise readings noted and transformer-wise, feeder-wise consumptions measured on all the DTRs and Feeders covered under HVDS scheme. But the DISCOMs are not paying heed to this direction. Information provided through these readings would have thrown much light on electricity consumption in agriculture sector as well as efficacy of HVDS scheme. We request the Commission to direct the DISCOMs once again to furnish the above information at the earliest.</p>	In TSSPDCL earlier CPDCL there was no provision for erection of meters under HVDS schemes phase I,II &III covered under REC funding. Meters are being erected to the DTRs under JICA HVDS scheme. Once the DTRs are charged under JICA scheme, the transformer wise feeder wise consumption will be measured.													
32.	<p>Deaths due to shocks</p> <p>7.7.1 Every year hundreds of farmers are meeting death due to electrical shocks. This is highly avoidable.</p> <p>7.7.2 During 2013-14 in Telangana 436 people died due to electrical shocks. More than 50% of these cases under SPDCL took place in the circles/districts of Mahabubnagar and Nalgonda. Similar is the case in the first half of 2014-15. Further these figures are an under estimate of the reality. Farmers are the main victims of this phenomenon.</p> <p>Table: Deaths Due to Electric Shocks</p> <table border="1"> <thead> <tr> <th></th> <th>2013-14</th> <th>First Half of 2014-15</th> </tr> </thead> <tbody> <tr> <td>NPDCL</td> <td>185</td> <td>87</td> </tr> <tr> <td>Mahabubnagar</td> <td>115</td> <td>69</td> </tr> </tbody> </table>		2013-14	First Half of 2014-15	NPDCL	185	87	Mahabubnagar	115	69	<p>Every effort is being made to avoid accidents, by taking up regular maintenance works like replacement of conductor, providing of inter poles , maintains of DTRs structure and LT lines, providing of earthing. Wide publicity being given requesting Ryots not to meddle with Distribution Transformers.</p> <table border="1"> <thead> <tr> <th>Accidents occurred during 2013-14</th> <th>Accidents occurred during 2014-15 jan 15</th> </tr> </thead> <tbody> <tr> <td>331</td> <td>259</td> </tr> </tbody> </table> <p>However all require measures are taken avoid accidents.</p> <p>The process to the pay the compensation will be examined for</p>	Accidents occurred during 2013-14	Accidents occurred during 2014-15 jan 15	331	259
	2013-14	First Half of 2014-15													
NPDCL	185	87													
Mahabubnagar	115	69													
Accidents occurred during 2013-14	Accidents occurred during 2014-15 jan 15														
331	259														

	Nalgonda	84	25		simplification as suggested. Balance cases pending for want of various documents such as FIR, postmortem, legal heir etc. Presently Rs.2 Lacks compensation is being paid to non-departmental fatal accident.
	SPDCL	251	129		
	Total Telangana	436	216		
	<p>7.7.3 The DISCOMs did not provide complete details of these incidents like for how many cases DISCOMs took responsibility and in how many cases compensation was paid and amount paid towards compensation. NPDCL mentioned that compensation was paid in 56 cases out of 185 deaths in 2013-14 and in 11 cases out of 87 deaths during the first half of 2014-15. Procedures need to be simplified to see that all victims receive compensation at the earliest.</p>				<p>In 2013-14 out of 331 accidents compensation Paid for 29 cases In 2014-15 out of 259 accidents compensation Paid for 12 cases The process to the pay the compensation will be examined for simplification as suggested. Balance cases pending for want of various documents such as FIR, postmortem, legal heir etc.</p>
	<p>7.7.4 Even in the electrocution deaths that the DISCOMs had taken responsibility the amount paid (about Rs. 1 lakh per person) is very meagre. Even this meagre amount was not paid properly. There is need to revise the compensation upwards like in the case of railways.</p>				<p>Presently Rs.2 Lacks compensation is being paid to non-departmental fatal accident.</p>
33.	<p>7.7.5 There shall also be separate mechanism to pin responsibility for deaths due to electricity shocks. In the present case perpetrator it self is the judge. To avoid this anomaly a committee comprising different stakeholders shall go into these deaths and pronounce whether DISCOMs are responsible for these tragedies or not.</p>				<p>Within 24 hours preliminary report and then detailed report is being furnished by ADE. As per Government of Telangana instructions the Chief Electrical Inspector to Government is being reported about the electrical accident. Then jurisdictional Deputy Electrical Inspector will investigate the electrical accident.</p>
34.	<p>7.7.6 More than this these deaths are highly avoidable. These deaths are taking place due to neglect of rural network by the DISCOMs. Every year the Commission allowed Rs. 5 crore to be spent by the DISCOMs on safety measures to avoid such deaths. But DISCOMs did not care to utilise them. NPDCL spent Rs. 34.25 lakh during 2013-14 and Rs. 12.29 crore during first half of 2014-15. If the safety of DTRs were improved many of these deaths could have been avoided.</p>				<p>During the financial year 2013-14 Rs. 35 crores expenditure incurred towards Renovation & Modernisation Works and Reliability Improvement and Contingency Works for network strengthening. Out of that expenditure in rural is Rs. 27 crores and urban Rs. 17 crores.</p> <p>All efforts are being made to maintain good quality electrical network. As per field requirement depending on the work load, the required field staff is deployed.</p>

	<p>7.7.7 In most of these cases it was the farmers who met this tragic end. These deaths could have been avoided if there were timely and sufficient technical support at the ground level and good quality electrical network. Most of the technical posts like linemen in rural areas are vacant and farmers are forced to attend to repair work on their own with fatal consequences. Thousands of line men posts are lying vacant since a long time. Recently Telangana State Government announced that hundreds of electrical engineers will be recruited shortly. But there is no word about recruiting line men. Filling line men posts not only bring down deaths due to shocks but also help to bring down T&D losses and their by add to the income of the DISCOMs.</p>	<p>In lieu of vacancies temporary arrangement made with outsourcing staff.</p>
35.	<p>Quality of Power</p> <p>7.8.1 Electricity received by the farmers was of uneven quality with unpredictable interruptions. Power supply timings announced by the Licensees are not being adhered to. It is the responsibility of the Commission under Section 86 (1) (i) of the Electricity Act, 2003 to enforce standards with respect to quality, continuity and reliability of service by licensees.</p> <p>7.8.2 In the past DISCOMs used to post feeder-wise electricity supply details on their websites. But they stopped this practice suddenly some time back. We request the Commission to direct the DISCOMs to post all relevant information on quantum and quality of supply on their websites.</p>	<p>The supply to Agriculture sector provided into two spells every day. All the efforts are made to provide supply in a fixed and stipulated timing without deviation. In case of emergencies, if any emergency load reliefs are implemented in the schedule time of supply and the same is being compensated on the same day.</p> <p>The feeder wise electricity supply details can be posted in the web site after completing the AMR for agl feeders under DDUGJY scheme</p>
36.	<p>DTR failure/repair</p> <p>7.8.4 DISCOMs are also not attending to maintenance of DTRs properly. Farmers are being forced to incur expenditure in transporting the DTRs. DTRs are also not being repaired in time. In Kanugutta village of Both mandal in Adilabad district it took 10 days to repair the DTR. In Madaka village of Odelu mandal in Karimnagar district it took more than one week to repair the transformer while under Standards of Performance DTRs in rural areas shall be repaired within 48 hours.</p>	<p>Instructions were issued to all the Superintending Engineers/ Operation for restoring power supply in case of all the failed Distribution Transformers (DTRs) [irrespective whether they are sick or failed or burnt or stolen; agricultural DTRs or non-agricultural DTRs] by replacement within 48 hours of receiving the complaint in Rural areas. TSSPDCL is maintaining sufficient quantity of healthy rolling stock of DTRs at all its SPM centers to facilitate timely replacement of the failed DTRs.</p>

37.	<p>7.8.5 Low quality of power in rural areas is also because of crumbling transmission and distribution network in rural areas. Decades old conductors are hanging low endangering lives as well as resulting high transmission losses. Many of the DTRs are more than decade old and should have been replaced. Added to this many of these DTRs do not have even AB switches. Depreciated and old parts of T&D network shall be replaced in keeping with prudent maintenance of the network in good health.</p>	<p>During the financial year 2013-14 Rs. 35 crores expenditure incurred towards Renovation & Modernisation Works and Reliability Improvement and Contingency Works for network strengthening. Out of that expenditure in rural is Rs. 17.23 crores and urban Rs. 17.77 crores.</p> <p>Further old and deteriorated transformers are survey reported and replenished regularly.</p>
38.	<p>DSM Measures</p> <p>7.9.1 To be eligible for free power, farmers have to undertake demand side management (DSM) measures i.e., installation of capacitors, ISI marked pump sets, HDPE or RPVC piping and frictionless foot-valve. These measures are proposed to bring down quantum electricity consumption in the agriculture sector there by reducing financial burden both on the state government and farmers. Farmers also would like to contribute to this endeavour. Though farmers are interested in taking them up they are facing hurdles in implementing them.</p> <p>7.9.2 DISCOM officials are claiming that more than 90% of the farmers have installed capacitors. But truth is that not even 10% of the farmers installed capacitors. Thousands of junior line men posts in rural areas are lying vacant. Even where junior linemen or assistant linemen are available they do not have proper knowledge in installation of capacitors. Installation of capacitors at a wrong point led to burning of pump sets, which scared other farmers from doing the same.</p>	<p>As per the Hon'ble APERC Tariff Orders the Agricultural Service with DSM measures only are eligible for free power. Accordingly, the services to the Agricultural Pump Sets are being released with DSM Measures which includes capacitors of adequate rating. Out of 8,93,397 Agricultural pump sets 7,22,797 are provided with the capacitors and wide publicity was given for implementation of DSM measures and educating the consumers at field</p>
39.	<p>7.9.3 A pilot implemented by SPDCL (p.88) power consumption declined by nearly 10% after installation of capacitors. This implies that by spending Rs. 60 crore to install capacitors at 20 lakh pump sets in Telangana DISCOMs will be able to save about Rs. 500 crore. This alone</p>	<p>As per the Hon'ble APERC Tariff Orders the Agricultural Service with DSM measures only are eligible for free power. Accordingly, the services to the Agricultural Pump Sets are being released with DSM Measures which includes capacitors of adequate rafting. Out of 8,93,397 Agricultural pump sets 7,22,797 are provided with</p>

	shall spur the DISCOMs to implement capacitor programme on war footing.	the capacitors and wide publicity was given for implementation of DSM measures and educating the consumers at field 836 Numbers of 2MVAR Capacitor Banks at 33/11Kv sub station are installed and inservice. Further 216 Nos Capacitor banks will be commissioned within a year
40.	7.9.4 Use of ISI standard pump set is another important DSM measure. Present pump set efficiency in the State is only 25% and this could be increased to 50% by using ISI standard motors. For proper operation of ISI standard pump sets minimum voltages are required. Under prevailing low voltages in the state these ISI motors do not work. Because of this low voltage, farmers are forced to go in for locally made pump sets which operate even under low voltages. One of the reasons for low voltage is overloading of distribution transformers (DTR) installed for agricultural purposes. This overload is to the extent of 25 to 50%. If this overload problem is addressed successfully farmers can think of using ISI standard motors. This can be addressed by increasing the number of DTRs of adequate capacity in the agriculture sector. We request the state government and DISCOMs to install additional DTRs to solve low voltage problem so that farmers will be emboldened to go in for ISI standard motors.	In order to eradicate low voltage problem & release of new agl connections 12969 Distribution Transformers are erected during 2014-15
41.	7.9.5 Though the farmers may be willing to install ISI standard motors in the event of voltages improving the financial burden on them will be onerous and it will be good to explore the ways of minimizing burden on them in replacing the non-standard motors with ISI standards motors. In Tamil Nadu, the State government and utilities are said to have taken up a programme where a third party – Electricity Service Company (ESC) – takes the responsibility of replacing the motors and is given a share in the savings of electricity consequent to installation of standard motors. We request the State government to explore this option also as it will not	The modalities of Tamil Nadu will be studied and detailed report will be submitted t the Government for policy decision.

	burden the state government as well as the farmers.	
42.	<p>7.10.1 Since 2005 HVDS programme is taken up in the state as a solution to the low voltage problem. Until now thousands of crores of rupees were spent on this but not even 10% of the pump sets were covered. A HVDS transformer is five times costlier than the regular DTRs being used at present. It was felt that if the same amount was spent on adding regular DTRs by this time the low voltage problem would have been solved. Even if the present additional load on existing DTRs is assumed as 50% then the estimated expenditure would be 50% of the cost of the existing DTRs. If we want to replace all the DTRs with HVDS DTRs the expenditure would be five times. The question is why spend 550% more when we could achieve with 50% only. We may be wrong in these calculations. Farming community in the state does not have any information on or insight in to this HVDS programme. Farming community in the state should have been taken in to confidence while formulating solution to low voltage in rural areas. This is not too late. We request the state government as well as the DISCOMs to place all the information related to HVDS before the public including farmers for an informed discussion on the problems being faced by both the DISCOMs and farmers in the state that will lead to a solution that is beneficial to all stakeholders.</p>	<p>The small capacity DTRs are being erected for release of new agl services in TSSPDCL. In HVDS scheme also, the existing 63/100 KVA are replaced with small capacity transformers. There is no cost difference in small capacity transformers being used in the above two scheme as there is no difference in the specifications. Hence there is no additional expenditure incurred on account of DTR cost.</p>
43.	<p>7.10.2 Over the last few years hundreds of crores were spent on implementing HVDS for agriculture pump-sets. The present filings also show that DISCOMs plan to spend more money on this. Before taking this programme forward there should have been a thorough review of its implementation until now. But there appears to be no such exercise. Given the serious implications of this investment (Consumers have to bear this</p>	<p>The main benefits of HVDS are to reduce theft, improve voltage profile, reduction in LT line losses, arresting of DTR failures and regularization of un-authorized services</p>

	burden in the form of higher cost of service) we place below our analysis of the investment under HVDS.																													
44.	<p>7.10.3 For the following analysis we have compared LT – DTR and HVDS. We have taken the transformer capacity as 63 kVA. Hours of supply in a day is assumed as 7 hours and number of days as 240 days. Cost of power is assumed as Rs. 3.00 per unit. We examined this under three power factor capacities – 0.6, 0.7 and 0.8</p> <p>The results of our analysis are presented in the following table. In this table reduction in line losses are taken as returns on investing on HVDS.</p> <table border="1"> <thead> <tr> <th>Power Factor</th> <th>Cost of HVDS (Rs.)</th> <th>Cost of Lt – DTR (Rs.)</th> <th>Addition al Cost (Rs.)</th> <th>Returns per year from HVDS (Rs.)</th> <th>Payback period (Years)</th> </tr> </thead> <tbody> <tr> <td>0.6</td> <td>6,29,628</td> <td>1,15,000</td> <td>5,14,628</td> <td>18,949</td> <td>27.16</td> </tr> <tr> <td>0.7</td> <td>6,29,628</td> <td>1,15,000</td> <td>5,14,628</td> <td>13,923</td> <td>36.96</td> </tr> <tr> <td>0.8</td> <td>6,29,628</td> <td>1,15,000</td> <td>5,14,628</td> <td>10,660</td> <td>48.28</td> </tr> </tbody> </table>					Power Factor	Cost of HVDS (Rs.)	Cost of Lt – DTR (Rs.)	Addition al Cost (Rs.)	Returns per year from HVDS (Rs.)	Payback period (Years)	0.6	6,29,628	1,15,000	5,14,628	18,949	27.16	0.7	6,29,628	1,15,000	5,14,628	13,923	36.96	0.8	6,29,628	1,15,000	5,14,628	10,660	48.28	HVDS for agl feeders are taken up mainly to reduce line losses (I ² R) and to improve voltage profile. Hence the agl consumers are getting quality supply with bare minimum interruptions like blowing of fuses ,failure of dtr etc.
Power Factor	Cost of HVDS (Rs.)	Cost of Lt – DTR (Rs.)	Addition al Cost (Rs.)	Returns per year from HVDS (Rs.)	Payback period (Years)																									
0.6	6,29,628	1,15,000	5,14,628	18,949	27.16																									
0.7	6,29,628	1,15,000	5,14,628	13,923	36.96																									
0.8	6,29,628	1,15,000	5,14,628	10,660	48.28																									
45.	<p>7.10.4 In Andhra Pradesh a power factors of 0.70/0.80 reflect the prevailing situation. Under these conditions it takes 37 to 48 years to recover the investment made in to the HVDS system, let alone profits over it. In other words the payback period for these investments is about 37 to 48 years. The guaranteed life of these transformers is about 3 years and its life may extend up to 10 years, but its' payback period is several times</p>					All the small capacity DTRs being erected hold 5 yrs guarantee period with 25 yrs life and is well within the payback period on par with all other T&D schemes.																								

	<p>more. Thus, financially speaking the HVDS does not appear to be attractive. Still the DISCOMs in the state are rushing in to implement it on large scale. And farmers are being coerced in to accepting it.</p>																							
46.	<p>7.10.5 One of the important reasons shown in promoting the HVDS system was elimination of unauthorised agriculture connections and theft. Experience in other states like Rajasthan and Uttar Pradesh shows that HVDS is not a deterrent to these practices and even under HVDS system theft continues to take place. We hear that Noida Power Company Limited (NDPL) in UP which went in to HVDS on a large scale is now thinking about winding it up.</p> <p>7.10.6 Though the returns from this HVDS scheme are doubtful it will surely end up as a huge burden on the consumers in the form of Cost of Service (COS) as these transformers are four times more costly than the present transformers.</p> <p>7.10.7 Based on these facts we request the Commission to review the past implementation of the HVDS in the state and also to put the presently proposed scheme with the support of JIBC to strictest test. We also request the Commission to direct the DISCOMs to provide us information on amount spent on HVDS and number of pump sets converted to HVDS each year since the programme was taken up.</p>	<table border="1" data-bbox="1510 332 2583 409"> <thead> <tr> <th>Year</th> <th>06-07</th> <th>07-08</th> <th>08-09</th> <th>09-10</th> <th>10-11</th> <th>11-12</th> <th>12-13</th> <th>13-14</th> <th>14-15</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td colspan="11" data-bbox="1510 409 2583 1334"> <p>The main objective of using small capacity DTRs is limit the consumers to 3-4 farmers duly regularizing the un authorized services as such there is no scope for the theft.</p> <p>The small capacity DTRs are being erected for release of new agl services in TSSPDCL. In HVDS scheme also, the existing 63/100 KVA are replaced with small capacity transformers. There is no cost difference in small capacity transformers being used in the above two scheme as there is no difference in the specifications. Hence there is no additional expenditure incurred on account of DTR cost.</p> </td> </tr> </tbody> </table>	Year	06-07	07-08	08-09	09-10	10-11	11-12	12-13	13-14	14-15	Total	<p>The main objective of using small capacity DTRs is limit the consumers to 3-4 farmers duly regularizing the un authorized services as such there is no scope for the theft.</p> <p>The small capacity DTRs are being erected for release of new agl services in TSSPDCL. In HVDS scheme also, the existing 63/100 KVA are replaced with small capacity transformers. There is no cost difference in small capacity transformers being used in the above two scheme as there is no difference in the specifications. Hence there is no additional expenditure incurred on account of DTR cost.</p>										
Year	06-07	07-08	08-09	09-10	10-11	11-12	12-13	13-14	14-15	Total														
<p>The main objective of using small capacity DTRs is limit the consumers to 3-4 farmers duly regularizing the un authorized services as such there is no scope for the theft.</p> <p>The small capacity DTRs are being erected for release of new agl services in TSSPDCL. In HVDS scheme also, the existing 63/100 KVA are replaced with small capacity transformers. There is no cost difference in small capacity transformers being used in the above two scheme as there is no difference in the specifications. Hence there is no additional expenditure incurred on account of DTR cost.</p>																								

		wis e							1 3	- 1 4		
		Pu mp sets	1354 7	295 01	2301 4	167 17	2517 0	520 3	0	0	114 14	1245 66
		Am oun t	34.7 2	43.0 8	38.0 0	29. 00	150. 22	40.4 9	0	0	55. 48	390.9 9
47.	<p><u>Directives on running neutral wire</u></p> <p>7.10.8 In the past the Commission directed the DISCOMs to run neutral wire from 33/11 kV substations to all single phase transformers, particularly in the back ground accidents with single phase HVDS transformers. TSSPDCL replied that instruction were issued for preparation of estimates under T&D improvements and furnishing proposals under feeder works for executing the work of running of neutral wire in villages. One thing is even after such a long time they are still in the stage of preparing the estimates. Another thing is that as DTRs of HVDS includes cost of running neutral wire from HVDS DTR to the substation preparation of estimates and new expenditure shall not arise. The whole affair also shows that DISCOMs are least bothered about safety of the consumers.</p>	<p>The Hon'ble Commission directed the DISCOMs to run neutral wire from 33/11KV substations to all single phase transformers, particularly in the back ground accidents with single phase transformers. Instructions were issued for preparation of estimates under T&D improvements and furnishing proposals under feeder works for executing the work of running of neutral wire in villages. The field Engineers complied with these instructions where ever the consumer safety is disturbed. For running neutral wire from DTRS to the Substations so far as many as 740 Nos. 11KV cross arms for neutral wiring were fabricated and issued to field. 46.3 KM conductor was allotted for said work. The neutral wire was strung from DTRS to the substations covering 15Nos. 11KV feeders emanating from various 7Nos. 33/11KV substations. The said work based on the field requirement for the safety of Consumers in a phased manner. Running of neutral wire being taken up from single phase dtr to substation wherever earthing is not proper due to rocky soils etc.</p>										

48.	<p>8.1 Filings of both the TSDISCOMs show that on the T&D losses front the situation in fact is deteriorating. During 2015-16 T&D losses in NPDCL area will be 15.56% and in SPDCL area 14.91%. There is scope to bring down these losses below 7%. Way back in 2010-11 EPDCL of Andhra Pradesh clocked T&D losses of 6.96%. DISCOMS shall be directed to take concerted action to bring down these losses. Lower T&D losses lead to lower power purchase cost and lower tariff burden.</p>	The TSSPDCL loss % is tabulated below			
		Loss	2013-14 (Actual)	2014-15 (Proj)	2015-16 (proj)
		Loss % incl. EHT	13.20	11.49	10.50
		Loss % excl. EHT	14.63	12.61	11.77
		TSSPDCL had considered the Losses as approved by the Hon Commission of the undivided state of Andhra Pradesh vide the MYT order dated 09.05.2014 for FY 2014-15 and for FY 2015-16. The licensee is putting all efforts to reduce the distribution losses.			
49.	<p>8.2 Within TSSPDCL the Hyderabad South Circle T&D losses are in the range of nearly 50% of the power supplied. During the past hearings also we have brought this to the notice of the Commission. Last year the High Court treated a letter written by an electricity consumer as a petition and after hearing different parties directed the authorities to take steps to bring down these losses. Following this some raids were conducted in some of the areas falling under this circle. According to a newspaper report out of 887 services inspected there were 20 instances of theft and 350 instances of meter tampering (The Hindu, 14th April, 2014). But these raids seem to have stopped in the wake of elections to Lok Sabha and state Assembly and were not resumed after the elections. We request the Commission to direct the TSSPDCL to resume inspection of services. Bringing down these losses in Hyderabad South Circle alone will bring additional revenue of about Rs.300 crore per year.</p>	Intensive inspections are being conducted on high loss feeders in the Hyd South Circle continuously to curb the theft and to reduce the losses. During last few months the no.of cases booked in the Hyd South Circle are increasing month by month and the assessment amount is also increased when compared to previous period as shown below:			
		Sl.No	Period	Total Cases Booked	
				No.	Amount (in
		1	Apr 2010 - Mar 2011	5015	292.96
		2	Apr 2011 - Mar 2012	3968	232.61
		3	Apr 2012	8933	536.11

			- Mar 2013		
		4	Apr 2013 - Jan 2014	7947	493.57
		5	Feb 2014 - Feb 2015	11995	901.61
		<p>The intensive inspections are being conducted continuously after the Hon'ble High court orders, the efforts made by the officers and staff of TSSPDCL are intensified for last 11 months in Hyderabad (South) circle by inspecting 18035 services by 741 teams and booked 11995 cases for an assessed amount of Rs.9.01 Crores</p>			
50.	<p>8.3 According to TSSPDCL's filings during FY 2013-14 cases were booked in 21.37% of the services inspected for malpractice. During FY 2014-15, up to 30th September 2014 cases were booked in 18.90% of the services inspected. This may be because of lack of awareness on the part of consumers or intent to benefit from malpractices and lack of proper vigilance on the part the DISCOM. TSNPDCL did not report information related to inspections. We request the Commission to direct the DISCOMs to create awareness among consumers and deal strictly with malpractices.</p>	<p>During the inspection of services there is a substantial no. of Malpractice cases are being booked for last two financial years and up to Oct 2014 also. The main reason for booking more no. of Malpractice cases such as using supply for unauthorized premises, the large variation in development charges in between domestic (1000/KW + Security deposit Rs 200 for KW) and commercial/Non-domestic (2000/KW + Security deposit Rs 800 for KW) services. Some of the applicants registering for new services in domestic purpose only, after release of supply the consumer start to open a small shop or business at the same premises without taking another commercial service, which attracts Malpractice case. The discom officers and staff are now taking efforts to create awareness among the consumers and the development charges for both domestic and commercial/Non domestic are recently made equal to Rs. 1200/KW which results in reducing of Malpractice cases in future.</p>			

51.	<p>Arrears</p> <p>9.1 Arrears pending for over six months to be received from consumers (with arrears above Rs. 50,000) as on 30th September 2014 stands at Rs. 2,146.34 crore (SPDCL – Rs. 1,796.07 crore and NPDCL - Rs. 350.27 crore). HT industries account for 50% of these arrears. If ordinary domestic consumers delay payments by two weeks their services are disconnected promptly. But, how do these people with arrears to the tune of crores continue to receive power. In the past information related to court cases related to these arrears used to be provided. At present the same is missing.</p>	<p>Arrears more than Rs50000/-:-</p> <table border="1" data-bbox="1634 282 2456 1401"> <thead> <tr> <th colspan="5">STATUS WISE ARREARS MORE THAN Rs50000/- (LT)</th> </tr> <tr> <th>LT CAT</th> <th>LIVE</th> <th>UDC</th> <th>BS</th> <th>Grand Total</th> </tr> </thead> <tbody> <tr> <td>LT-I</td> <td>604.26</td> <td>834.7 2</td> <td>206.63</td> <td>1645.61</td> </tr> <tr> <td>LT-II</td> <td>1274.8 4</td> <td>502.1 2</td> <td>400.36</td> <td>2177.33</td> </tr> <tr> <td>LT-III</td> <td>951.79</td> <td>593.7 5</td> <td>941.45</td> <td>2486.99</td> </tr> <tr> <td>LT-IV</td> <td>6.67</td> <td>1.22</td> <td>0.00</td> <td>7.89</td> </tr> <tr> <td>LT-V</td> <td>2281.8 6</td> <td>238.9 9</td> <td>1135.83</td> <td>3656.68</td> </tr> <tr> <td>LT-VI</td> <td>59904. 83</td> <td>616.1 6</td> <td>13.69</td> <td>60534.68</td> </tr> <tr> <td>LT-VII</td> <td>223.24</td> <td>164.8 6</td> <td>40.30</td> <td>428.40</td> </tr> <tr> <td>LT-VIII</td> <td>0.00</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Grand</td> <td>65247</td> <td>2951.</td> <td>2738.26</td> <td>70937.5</td> </tr> </tbody> </table>	STATUS WISE ARREARS MORE THAN Rs50000/- (LT)					LT CAT	LIVE	UDC	BS	Grand Total	LT-I	604.26	834.7 2	206.63	1645.61	LT-II	1274.8 4	502.1 2	400.36	2177.33	LT-III	951.79	593.7 5	941.45	2486.99	LT-IV	6.67	1.22	0.00	7.89	LT-V	2281.8 6	238.9 9	1135.83	3656.68	LT-VI	59904. 83	616.1 6	13.69	60534.68	LT-VII	223.24	164.8 6	40.30	428.40	LT-VIII	0.00				Grand	65247	2951.	2738.26	70937.5
STATUS WISE ARREARS MORE THAN Rs50000/- (LT)																																																									
LT CAT	LIVE	UDC	BS	Grand Total																																																					
LT-I	604.26	834.7 2	206.63	1645.61																																																					
LT-II	1274.8 4	502.1 2	400.36	2177.33																																																					
LT-III	951.79	593.7 5	941.45	2486.99																																																					
LT-IV	6.67	1.22	0.00	7.89																																																					
LT-V	2281.8 6	238.9 9	1135.83	3656.68																																																					
LT-VI	59904. 83	616.1 6	13.69	60534.68																																																					
LT-VII	223.24	164.8 6	40.30	428.40																																																					
LT-VIII	0.00																																																								
Grand	65247	2951.	2738.26	70937.5																																																					

			Total	.49	82		8	
			% OF SHARE IN ARREARS					
	The	LT-I	1	28	8		2	% of
	LT	LT-II	2	17	15		3	
		LT-III	1	20	34		4	
		LT-IV	0	0	0		0	
		LT-V	3	8	41		5	
		LT-VI	92	21	1		85	
		LT-VII	0	6	1		1	
		LT-VIII	0	0	0		0	
		Grand Total	100	100	100		100	
		<p>Domestic arrears in live services is only Rs.604.26 Lakhs (1%) to be persued where as in LT Agricultural category the live arrears are Rs.2281.86Lakhs (3%).The major arrears is from Street light and water works Cat-6 live arrears Rs.59904.83 Lakhs (92%).Constant persuasion is done with Govt. for collection the amounts and reducing the Arrears to the least extent.</p>						

STATUS WISE ARREARS MORE THAN Rs50000/- (HT)				
CAT	PVT	GOVT	Court Cases	Grand Total
1	38889. 26	27000. 36	26310.6 2	92200.23
2	1338.0 5	4442.3 7	2522.49	8302.91
3	58.16	41.91	352.42	452.49
4	1433.3 3	5176.5 2	17.21	6627.06
5	0.00	529.57	30.50	560.07
6	0.00	10.07	24.12	34.19
TMP	267.07	0.00	225.75	492.82
Gra nd Tota l	41985 .86	37200. 80	29483.1 2	108669.78
LT+ HT				179607.36

		<table border="1"> <tr> <td data-bbox="1507 191 1634 349">% Of Share</td> <td data-bbox="1634 191 1784 349">39</td> <td data-bbox="1784 191 1938 349">34</td> <td data-bbox="1938 191 2110 349">27</td> <td data-bbox="2110 191 2343 349">100</td> </tr> </table>	% Of Share	39	34	27	100	<p>As seen from the tabulated figures shown above the % of Govt and Court cases arrears are around Rs.66683.93Lakhs (61%) and the balance arrears Rs.41985.86(39%) are being constantly pursued for early realization.</p>
% Of Share	39	34	27	100				

S.No	Summary of Objections / Suggestions	Response of the Licensee
	25. J.Nageswara Rao, President, Federation of Telangana Small (MSME) Industries Associations, Industrial Estate, Sanathnagar, Hyderabad – 500 018	
1	<p>The small scale industry suffered heavily in the state since last 4 years due to power shortage in the combined state of A.P. and continuous political unrest with bundhs and agitations. The industry lost the business and orders and many industries became NPA and under the verge at closure. In the year 2012 to 2014 itself the tariff was revised three times and collected arrears of FSA of the previous 5 years. As a result the industry is subjected to heavy burden of tariff without any quality power and worked only 20 days in a month.</p> <p>In view of this we request the Hon'ble Commission not to allow any increase in the power tariff to micro and Small Industries in the state</p>	<p>In the Tariff Order for FY 2013-14, the average Cost to Serve (CoS) as approved by the Hon'ble Commission for the Telangana was Rs 5.46/Unit. Since then, there has been a significant increase in the average CoS during the year and the licensee expects the trend to continue for the ensuing year.</p> <p>The Licensee estimates the state level CoS for the year FY 2015-16 to be at Rs. 5.98/Unit. This implies that an increase of Rs.0.52/ Unit (10 % increase)</p>
2	<p>It is more advisable to reduce the tariff to industry to support and for promotion of industry in the newly formed state. By this way the state can attract the outsiders to set up industry in the state which will help to promote the employment generation and revenue to the state.</p>	<p>The increase in the CoS is due to the following reasons</p> <ol style="list-style-type: none"> 1. The Network cost approved in FY 13-14 was Rs. 0.83/Unit and this has increased to Rs. 1.00 /Unit primarily due to increase in wages of employees, increased Capital Investment of the licensee. 2. The interest costs on the short term loans converted to Long term loan under Financial Restructure plan amounts to Rs. 141 crores has also increased the ARR in FY 2015-16. 3. The Licensees has projected a consolidated revenue deficit for FY 13-14 and FY 14-15 to the tune of Rs. 1463 Crs. The high revenue deficit for the period is primarily due to increase in Power Purchase cost, Network cost and other cost in FY 14-15 and no tariff revision in FY 14-15. <p>Hence, the Distribution licensee feels that the increased</p>

		CoS should reflect appropriately in the tariff structure. Hence, the licensee proposed moderate increase in the tariff for various categories.
3	FETSIA request the Hon'ble Commission to suggest to DISCOMs to allocate 10% of the power generated in the state to industry. The industry in the state is situated in 24 industrial parks in and around Hyderabad needs only 500 to 600 M.W only.	For FY 2013-14 out of the total sales of 31869 MU, sales pertaining to Industry are 10537 MU which is nearly 34%. For FY 2015-16 also, the Industry category sales are nearly 35%. Hence it is to inform that more than 10% power is being allocated to Industry.
4	The Industry needs quality power without any power holiday to recoupe the past losses and growth which helps to give more direct and indirect employment in the state.	The Discoms, Transco and Genco are alive to the challenges highlighted by the objector and following are some of the key steps been taken to address the concerns
5	Since all the industrial parks around Hyderabad has exclusive substations and dedicated feeders we request not to impose the peak hour cuts and penalties to save the continuous processed industries to avoid losses and maintain the idle labour which leads to layoffs. The small scale industry mainly run by a single person and has to struggle to manage the entire process cannot afford to pay the penalties.	TS Genco Following capacity additions (thermal) are been planned <ul style="list-style-type: none"> - KTHP Stage II – 600 MW - KTHS Stage VII – 800 MW - Manuguru 1080 MW - Damarcherla A 1200 MW - Damarcherla B 3200 MW - KTHS Stage VII – 800 MW In addition 250 MW from Hydel sources are planned. Issue of low PLFs due to coal shortage is been taken up with Coal India at all forums for resolution. MOU was signed with Govt of Chhattisgarh for procurement of 1000 MWs of power Corridor constraint issue is been addressed through the execution of new inter-state transmission lines Wardha- Nizamabad- Hyderabad (765 KV D/C line) Warora – Warangal – Hyderabad (765 KV D/C line) In addition system strengthening and new schemes are been executed by TS Transco to ensure adequate grid

		reliability and availability.
6	The late fee collection on the bills should be charged to the actual number of days and not to the entire month which we have been pleading since last.	Late fee collection for industrial consumers is charged on no of days of delay at the rates specified by the Commission mentioned in the Tariff Order 2013-14
7	The ACD amount collected every year should be dispensed with since the initial deposits are with department. If it is at all not possible the industry should be allowed to pay in the form bank guarantee or 50% cash and 50% bank guarantee	ACD collected as per the Regulation No. 6 of 2004 approved by Hon Commission.
8	The peak hour penalties in the state was waived by Hon'ble Chief Minister in his meeting with the industry on 22 nd August 2014 and he openly declared on the dias that the balance of the penal amounting to 60 cr will be paid to DISCOMS by the Government. Hence the DISCOMs should approach the Government for this amount and not to ask the industry and not to cut the power to realize this amount. The Hon'ble CM's promise should be respected and DISCOM's should correspond with the Government	The Discom will takeup the issue.
9	The LT III B category which was there earlier for promotion of small scale industry should be restored and the specification of previous 150 HP should be increased to 200 HP. This will enable the industry to avoid excess huge initial cost of structural expenditure and avoid the abnormal fixed charges	<p>Earlier under the specific conditions applicable to LT-III (B), the metering was provided on HT side of the Distribution Transformer with a Tri-vector meter and Customer charges shall be as applicable for HT-11KV consumers.</p> <p>As the consumer base and energy usage of LT-III(B) is very similar to the HT 11 kV Industrial consumers and also the metering of LT-III(B) consumers is being done on the HT side, Discoms have proposed to merge LT-III(B) category with HT-I Industrial category during the ARR filing for FY 2013-14 and the same was approved by the Hon Commission.</p> <p>In view of the above the LT-III (B) category cannot be restored.</p>
10	The procedure of (CEIG) central Electricity inspectorate general should be dispensed with while connecting the additional load to the industry since	When a consumer is installing a new motors or electrical appliances invariably adhere to safety standards to avoid

	A.E's , ADEs and DEs who are sanctioning the load can inspect the unit while connecting the additional load. By this way the DISCOM's can save the time and avoid delays in operation	accidents, which will be ensured by the CEIG. Hence CEIG approval is mandatory for additional loads also.																																				
5.	<p>It is respectfully submitted that the Learned Commission may kindly note the following views and suggestions while determining the ARR Proposal and also Tariff Proposals:</p> <p>(A) There is no clarity how the categorization of consumers on the basis of consumption was taken and same is the case with the mode for arriving at the categorization. The proposed increase of tariff for the consumers who consume above 200 units is not proportionate and reasonable. The mid-segment will be hit hard and if at all, the categorization has to be done, there should be more categories and all the consumers above 200 units cannot be clubbed. The Proposed increase for the consumers consuming beyond 200 and up to 400 units should be fixed proportionately on the lines of increase proposed in the previous category and the Learned Commission may be kind enough to consider the above submission and issue appropriate directions. It is further submitted that there are unorganized housing sector by various class of people, daily labourer, workers and other consumers whose consumption was never accounted for as this unorganized housing sector was never metered nor any steps were taken to regularly monitor the illegal connections like connecting during the night and disconnecting in the day time which is rampant in urban areas and this burden and cost of consumption is passed on to the other consumers and the individual consumers are worst hit by the above count. It is right time that the learned commission should consider appointing monitoring committees in various places to check fly by night connections so that there will be saving in the power consumption and cost of the actual power consumed is remitted to the DISCOMs. It is also further submitted that there has been lot of pilferage of power and so far DISCOMS have not bothered to conduct any study and correct statistics and take steps to prevent pilferage and unfortunately the cost of the Pilferage because of the negligence of the Discoms is passed on to the genuine consumers and thus, the honest consumers are taxed for their</p>	<p>The Discom has proposed to continue the existing slabs to extend the benefit to the poor & low consumption consumers. TSSPDCL is making vigorous inspections and registered pilferage cases in its area. The cases booked and amount booked during First half of FY 2014-15 is tabulated below.</p> <table border="1" data-bbox="1516 529 2421 1406"> <thead> <tr> <th></th> <th>Apr-14 to June-14</th> <th>July-14 to Sep-14</th> </tr> </thead> <tbody> <tr> <td>No of services inspected</td> <td>189519</td> <td>140824</td> </tr> <tr> <td>No of cases booked</td> <td>29990</td> <td>29046</td> </tr> <tr> <td>Multiple connections</td> <td>138 clubbed into 52</td> <td>148 clubbed into 46</td> </tr> <tr> <td>Direct Tapping</td> <td>6343</td> <td>5719</td> </tr> <tr> <td>Amount assessed & realised (in Lakhs)</td> <td>107.92/34.61</td> <td>133.34/30.32</td> </tr> <tr> <td>Meter bypassing</td> <td>1509</td> <td>1093</td> </tr> <tr> <td>Amount assessed & realised</td> <td>552.39/173.54</td> <td>249.46/98.94</td> </tr> <tr> <td>Supply utilised for UDC</td> <td>1902</td> <td>2278</td> </tr> <tr> <td>Amount assessed & realised</td> <td>7.82/3.77</td> <td>9.68/3.42</td> </tr> <tr> <td>Supply extended to other tariff Category</td> <td>4858</td> <td>4999</td> </tr> <tr> <td>Amount assessed & realised</td> <td>184.44/114.88</td> <td>299.68/120.17</td> </tr> </tbody> </table>		Apr-14 to June-14	July-14 to Sep-14	No of services inspected	189519	140824	No of cases booked	29990	29046	Multiple connections	138 clubbed into 52	148 clubbed into 46	Direct Tapping	6343	5719	Amount assessed & realised (in Lakhs)	107.92/34.61	133.34/30.32	Meter bypassing	1509	1093	Amount assessed & realised	552.39/173.54	249.46/98.94	Supply utilised for UDC	1902	2278	Amount assessed & realised	7.82/3.77	9.68/3.42	Supply extended to other tariff Category	4858	4999	Amount assessed & realised	184.44/114.88	299.68/120.17
	Apr-14 to June-14	July-14 to Sep-14																																				
No of services inspected	189519	140824																																				
No of cases booked	29990	29046																																				
Multiple connections	138 clubbed into 52	148 clubbed into 46																																				
Direct Tapping	6343	5719																																				
Amount assessed & realised (in Lakhs)	107.92/34.61	133.34/30.32																																				
Meter bypassing	1509	1093																																				
Amount assessed & realised	552.39/173.54	249.46/98.94																																				
Supply utilised for UDC	1902	2278																																				
Amount assessed & realised	7.82/3.77	9.68/3.42																																				
Supply extended to other tariff Category	4858	4999																																				
Amount assessed & realised	184.44/114.88	299.68/120.17																																				

	honesty.	<p>The Licensee is working on actively cutting down losses. The Vigilance (DPE) wings are available in the DISCOMs who are exclusively conducting inspections to detect theft and any other unauthorized usage of supply by the consumers. The DPE wing is conducting the intensive inspections on high loss DTR areas along with Operation Engineers for verifications of bill stopped, UDC, Nil Consumption, not in use services and meter tamper services. And conducting of special raids in rampet theft areas to book theft cases. Apart from the DPE wing, the operation staff are also booking cases where ever theft is noticed. In view of the above, all the necessary steps are being taken to curb the theft of energy in TSSPDCL</p>
6.	(B) Discom has not followed a scientific approach to determine the revenue requirement, revenue and energy deficit and the figures on the above count are imaginary and intended to suite the requirements of the DISCOM.	<p>The revenue requirement of the discoms has been computed to cover the following key components of costs-</p> <ol style="list-style-type: none"> 1. Power purchase costs 2. Distribution costs 3. State Transmission costs 4. PGCIL, ULDC and SLDC charges. 5. Consumer security deposits. 6. True-up/true-down of previous years <p>Revenue has been computed based on the category-wise sales forecast and the proposed tariff for each consumer category.</p> <p>Availability of power has been computed based on the availability furnished by the generators and market purchases. Energy deficit has been arrived based on the projected availability of power and demand from consumers.</p> <p>Hence the discoms have followed a methodical approach based on sound scientific principles in accordance with</p>

		the 'Regulation no 4 of 2005 - Terms and Conditions for determination of wheeling and retail sale 'issued by the Hon Commission
7.	(C) Compared to the previous years, the growth rate on actual ground has come down which is as per the statistics in the public domain. These facts have not been considered by the DISCOM for the energy deficit and power purchase.	Sales projections are made as per the historical sales data, upcoming loads which will have large impact in the sales, anticipated economic & climatic conditions, Govt. policies on industry, etc. The licensee is projecting sales with the acceptable scientific methods. The DISCOMs have projected the sales keeping in view of the economic condition of the districts after the bifurcation, increasing industrial activity, focus of new government on industries and commercial activities.
8.	(D) The increased tariff by DISCOMS is artificial. In this connection it is essential to note that the Government in the State of Delhi and which came into power again has reduced the tariff by 50% and ordered audit of the DISCOMS to find out the correctness or otherwise of revenue and expenditure of the DISCOM. It is therefore necessary that the learned commission should contemplate issuing orders for audit of the DISCOMS by the C&AG as is being done in state of DELHI and until such time, be pleased to direct that the present proposal to increase the rate to be held in abeyance.	<p>In the Tariff Order for FY 2013-14, the average Cost to Serve (CoS) as approved by the Hon'ble Commission for the Telangana was Rs 5.46/Unit. Since then, there has been a significant increase in the average CoS during the year and the licensee expects the trend to continue for the ensuing year.</p> <p>The Licensee estimates the state level CoS for the year FY 2015-16 to be at Rs. 5.98/Unit. This implies that an increase of Rs.0.52/ Unit (10 % increase)</p> <p>The increase in the CoS is due to the following reasons</p> <ol style="list-style-type: none"> 1. The Network cost approved in FY2013-14 was Rs.0.83/Unit and this has increased to Rs.1.00/Unit primarily due to increase in wages of employees, increased Capital Investment of the licensee. 2. The interest costs on the short term loans converted to Long term loan under Financial Restructure plan amounts to Rs.141 crore has also increased the ARR in FY2015-16.

		<p>3. The Licensees has projected a consolidated revenue deficit for FY2013-14 and FY2014-15 to the tune of Rs.1463 crore. The high revenue deficit for the period is primarily due to increase in Power Purchase cost, Network cost and other cost in FY2014-15 as there is no tariff revision in FY2014-15.</p> <p>The Distribution licensee feels that the increased CoS should reflect appropriately in the tariff structure. Hence, the licensee proposed nominal tariff hike for various categories.</p>						
9.	(E) Private power producing companies are inflating the cost of coal and fuel etc., and thereby inflating the selling price of the power under power purchase agreements. This is going unchecked and DISCOMS are buying the power from these private companies without appreciating the artificial hiking of the Purchase price by these companies.	Determination of cost of coal and gas is not in the purview of Discoms. However the Discoms are procuring power through Short term and medium term sources duly following the rules and competitive bidding guidelines in vogue.						
10.	(F) The very fact that there is no uniformity in the purchase price of power per unit from various companies reveal that the DISCOMS are not trying to scrutinize the reasonableness of the price being quoted by the power producers. It is therefore suggested to have a mechanization to ascertain that the Power producing companies do not make unreasonable gains at the cost of the energy consumers. The learned commission may also contemplate appointing scrutinizers, persons from consumer's side and independent technical consultants to audit the power producing companies to ensure that these companies do not inflate the cost and expenses and thereby make unreasonable gains.	The purchase price of power per unit of various sources can not be uniform as it depends on various factors such as nature of Fuel, the location at which the station located, the technology used, etc.						
11.	(G) The DISCOMS have not made any exercise in ascertaining and arresting energy pilferage with the result, the cost of the pilferage is passed on to the consumers and the DISCOMS are being let off and allowed to pass on the additional cost arising on account of their negligence on to the consumers.	<p>TSSPDCL is making vigorous inspections and registered pilferage cases in its area. The cases booked and amount booked during First half of FY2014-15 is tabulated below.</p> <table border="1"> <thead> <tr> <th></th> <th>Apr-14 to June-14</th> <th>July-14 to Sep-14</th> </tr> </thead> <tbody> <tr> <td>No of services inspected</td> <td>189519</td> <td>140824</td> </tr> </tbody> </table>		Apr-14 to June-14	July-14 to Sep-14	No of services inspected	189519	140824
	Apr-14 to June-14	July-14 to Sep-14						
No of services inspected	189519	140824						

		No of cases booked	29990	29046
		Multiple connections	138 clubbed into 52	148 clubbed into 46
		Direct Tapping	6343	5719
		Amount assessed & realised (in Lakhs)	107.92/34.61	133.34/30.32
		Meter bypassing	1509	1093
		Amount assessed & realised	552.39/173.54	249.46/98.94
		Supply utilised for UDC	1902	2278
		Amount assessed & realised	7.82/3.77	9.68/3.42
		Supply extended to other tariff Category	4858	4999
		Amount assessed & realised	184.44/114.88	299.68/120.17
		<p>The Licensee is working on actively cutting down losses. The Vigilance (DPE) wings are available in the DISCOMs who are exclusively conducting inspections to detect theft and any other unauthorized usage of supply by the consumers. The DPE wing is conducting the intensive inspections on high loss DTR areas along with Operation Engineers for verifications of bill stopped, UDC, Nil Consumption, not in use services and meter tamper services and conducting of special raids in rampet theft areas to register theft cases. Apart from the DPE wing, the operation staff are also registering cases wherever theft is noticed. In view of the above, all the necessary steps are being taken to curb the theft of energy in TSSPDCL</p>		
12.	(H) DISCOMS are also silent on Metering of agricultural consumers and	TSSPDCL is adopting the ISI suggested methodology for		

	consequential impact of the same on other consumers.f	estimating the Agriculture consumption in which the sample agriculture DTRs are metered and the sample will vary for every six months so that, all the agriculture DTRs will be metered within a certain period.																					
13.	(I) The learned commission's directives contained in tariff order for the year 2013 and 14 have not been complied with substantially by the DISCOM and its replies to the compliance of the above directive are evasive in most of the cases and on this count alone, the present ARR and Tariff proposal for to2015-16 could be held in abeyance till the Directives issued by the learned commission have been substantially complied with by the DISCOM. In this regard it is suggested that the learned commission may kindly appoint a committee with the representatives of each category of Consumers apart from the other members of repute and calibre to study and give a report on the compliance of the Directives of this learned commission by the DISCOM. For instance some directives of the learned commission reproduced by the TSSPDCL in its ARR & Tariff proposal for the FY2015-16 under FRESH DIRECTIVES at page no.88 TO 97 however, they have not been complied with by the Discom. It is also submitted that some of the directives issued by the Learned Commission in its order for the financial year 2012 – 2013 have also not been complied with by the Discom till date and it is evidenced by the statements of the Discom in it proposal for the financial year 2015 – 2016.	It is to inform that the directives issued by the Hon Commission are complied and TSSPDCL is submitting the compliance report to the Hon Commission.																					
14.	(J) There are differences in the revenue loss shown to have occurred for 2013 – 2014 but the figures do not match as shown in the petition more particularly with reference to Rs.2135 cores in case of TSSPDCL and this needs to be explained by the DISCOMs.	<p>The revenue loss of Rs.2135 crores for FY2013-14 is arrived in the following manner (in Rs. Crores)</p> <table border="1"> <thead> <tr> <th colspan="2">Tariff order</th> <th colspan="2">Actual</th> <th colspan="3">Variance</th> </tr> <tr> <th>Tariff Revenue</th> <th>Non-Tariff Income</th> <th>Tariff Revenue</th> <th>Non-Tariff Income</th> <th>Tariff Revenue</th> <th>Non-Tariff Income</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>16172.86</td> <td>98</td> <td>14120</td> <td>15.66</td> <td>2052.86</td> <td>82.34</td> <td>2135.2</td> </tr> </tbody> </table>	Tariff order		Actual		Variance			Tariff Revenue	Non-Tariff Income	Tariff Revenue	Non-Tariff Income	Tariff Revenue	Non-Tariff Income	Total	16172.86	98	14120	15.66	2052.86	82.34	2135.2
Tariff order		Actual		Variance																			
Tariff Revenue	Non-Tariff Income	Tariff Revenue	Non-Tariff Income	Tariff Revenue	Non-Tariff Income	Total																	
16172.86	98	14120	15.66	2052.86	82.34	2135.2																	

15.	(K) The sales reduction is shown as 12.97% in the petition but the same does not tally with the figures shown in tables and other places.	<p>The sales reduction shown as 12.97% pertains to reduction in metered sales in FY2013-14 against the Tariff order approved sales. The same table shown in the filings with variance column addition is shown below</p> <table border="1" data-bbox="1510 342 2421 727"> <thead> <tr> <th rowspan="3">Particulars</th> <th colspan="4">2013-14 (APCPDCL)</th> </tr> <tr> <th>APERC Order</th> <th>Actuals</th> <th colspan="2">Variance</th> </tr> <tr> <th>MU</th> <th>MU</th> <th>MU</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Metered Sales</td> <td>26061.59</td> <td>22679.24</td> <td>(3382.35)</td> <td>(12.97)</td> </tr> <tr> <td>LT Agricultural Sales</td> <td>8073.9</td> <td>9190.49</td> <td>1116.59</td> <td>13.82</td> </tr> </tbody> </table>	Particulars	2013-14 (APCPDCL)				APERC Order	Actuals	Variance		MU	MU	MU	%	Metered Sales	26061.59	22679.24	(3382.35)	(12.97)	LT Agricultural Sales	8073.9	9190.49	1116.59	13.82				
Particulars	2013-14 (APCPDCL)																												
	APERC Order	Actuals		Variance																									
	MU	MU	MU	%																									
Metered Sales	26061.59	22679.24	(3382.35)	(12.97)																									
LT Agricultural Sales	8073.9	9190.49	1116.59	13.82																									
16.	(L) The estimated gap in the prayer is 1293.56 crores for the year under review and the same does not match with the figures provided in the table in the petition. No rational was given for posing a tariff to consumers who consume less than 200 units and who consume more than 200 units.	<p>The estimated gap in the Prayer of Rs. 1283.56 crores for the year FY2014-15 pertains to TSSPDCL excluding Anantapur & Kurnool gap which is shown in the following table</p> <table border="1" data-bbox="1510 883 2421 1408"> <thead> <tr> <th rowspan="2">Revenue Deficit / Surplus (Rs. Crs.)</th> <th colspan="3">2014-15</th> </tr> <tr> <th>TSSPDCL</th> <th>ATP & KNL</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Aggregate Revenue Requirement (Rs. Crs.)</td> <td>16086</td> <td>590</td> <td>16676</td> </tr> <tr> <td>Revenue from Current Tariffs (Rs. Crs.)</td> <td>13339</td> <td>429</td> <td>13767</td> </tr> <tr> <td>Non - Tariff Income (Rs. Crs.)</td> <td>12</td> <td>1</td> <td>13</td> </tr> <tr> <td>Revenue from Wheeling (Rs. Crs.)</td> <td>-</td> <td>-</td> <td>-</td> </tr> <tr> <td>Revenue Deficit(-) / Surplus(+) at Current Tariffs (Rs. Crs.)</td> <td>(2735)</td> <td>(161)</td> <td>(2896)</td> </tr> </tbody> </table>	Revenue Deficit / Surplus (Rs. Crs.)	2014-15			TSSPDCL	ATP & KNL	Total	Aggregate Revenue Requirement (Rs. Crs.)	16086	590	16676	Revenue from Current Tariffs (Rs. Crs.)	13339	429	13767	Non - Tariff Income (Rs. Crs.)	12	1	13	Revenue from Wheeling (Rs. Crs.)	-	-	-	Revenue Deficit(-) / Surplus(+) at Current Tariffs (Rs. Crs.)	(2735)	(161)	(2896)
Revenue Deficit / Surplus (Rs. Crs.)	2014-15																												
	TSSPDCL	ATP & KNL	Total																										
Aggregate Revenue Requirement (Rs. Crs.)	16086	590	16676																										
Revenue from Current Tariffs (Rs. Crs.)	13339	429	13767																										
Non - Tariff Income (Rs. Crs.)	12	1	13																										
Revenue from Wheeling (Rs. Crs.)	-	-	-																										
Revenue Deficit(-) / Surplus(+) at Current Tariffs (Rs. Crs.)	(2735)	(161)	(2896)																										

		Subsidy	1585	62	1647
		Net gap- Deficit(-) / Surplus	(1151)	(99)	(1250)
		Carrying Cost @ 11.5% p.a.	132		
		Total Gap including Carrying Cost	1283		
17.	(M) The cost of service is not reflected in the tariff proposed for both the domestic and industrial.	<p>With regard to the reflection of CoS in the Tariff it is to inform that the the tariff need not be the mirror image of actual cost of supply or voltage-wise cost of supply.</p> <p>The Hon'ble Tribunal in various appeals held as under "However, we are not suggesting that the tariffs should have been fixed as mirror image of actual cost of supply or voltage-wise cost of supply or that the cross subsidy with respect to voltage-wise cost of supply should have been within $\pm 20\%$ of the cost of supply at the respective voltage of supply."</p> <p>The legislature by amending Section 61(g) of the Electricity Act by Act 26 of 2007 by deleting the word 'eliminating cross subsidies' has expressed its intent that cross subsidies may not be eliminated.</p>			
18.	(N) Resorting to short term purchase will burden the consumers of all categories. The Discoms by this time should have a long term plan but, every year, the Discoms resort to short term plans and burden the consumers and this is highly discriminating, irresponsible and without any concern for the suffering consumers. The Learned Commission may kindly take note of this concern and give appropriate directions to the Discoms for the long term plans and purchase of power at reasonable rates.	<p>Based on the projected demand for the coming years, discoms are taking all measures for procurement of power under long term basis. Procuring 2000 MW of power on long term basis under competitive bidding is currently under progress.</p> <p>An MOU for procuring 1000 MW of power from Chattisgarh has already been signed.</p>			
19.	(O) The claims of the Discoms for recovery of the principal and interest thereon of the short-term loans during 2015-16 and/or thereafter from consumers through true-up or tariff as also FSA amounts from 2009-10 to	<p>The accumulated losses as on 31st march 2013 has been considered under the FRP scheme which was designed by GOI. Discoms pray that the Hon'ble Commission permit</p>			

	2011-12 are not permissible in the present application by the Discoms.	this as these are the actual cost incurred by the discoms.
20.	(P) Though then erstwhile APERC directed the Discoms to resubmit their ARR and tariff proposals in view of bifurcation of the State with updated details, the Discoms did not do so as such, the Discoms by virtue of their default and omission should not be permitted to recover carrying cost of Rs.132 crore for the year 2014-15 from the consumers.	Due to bifurcation of the State, the Government of Telangana had issued orders for the constitution of Telangana State Electricity Regulatory Commission (TSERC) in Jul'14 and TSERC was constituted in Nov'14. Hence the discoms have submitted ARR and tariff proposals for FY2015 along with the projected revenue gap for FY2014-15.
21.	(Q) Discoms have shown agricultural consumption exceeding the levels permitted by the Commission by 406 MU for TSNPDCL and an increase for 2014-15 to 37.28% from 32.87% in 2013-14; and by 1116.57 MU for TSSPDCL for the year 2013-14 and an increase for 2014-15 to 22.98% from 20.95% in 2013-14. Since the Government is giving subsidy including cross subsidy, the Commission should not permit true-up of expenditure for revised excess consumption for agriculture and the same should be provided as additional subsidy by the Government. Since the Government has agreed to provide substantial subsidy for 2015-16, the Discoms should explain what the above said subsidy covers and in the absence of the same, it has to be presumed that the same covers expenditure for revised excess consumption for agriculture.	<p>Estimation of agricultural sales is based on the ISI methodology approved by the Hon'ble Commission.</p> <p>Licensees are obligated to provide supply to all categories of consumers, including subsidised consumers.</p> <p>As per the National Tariff Policy, the tariffs to the consumers are to be fixed at +/- 20% of COS. Hence it is deemed that the consumers whose tariffs are fixed over and above COS will cross subsidise the consumers whose tariffs are below COS to ensure revenue neutrality</p> <p>Any other revenue deficit after adjusting cross subsidy will be met through Government Subsidy.</p> <p>The projected revenue gap of the discom has to be met through revenue from tariffs and government subsidy.</p>

S.No	Summary of Objections / Suggestions	Response of the Licensee
	26. Buddhadeb Shane, GMR Hyderabad International Airport Ltd, GMR Aero Towers, RGIA, Shamshabad, Hyderabad – 500 409	
7.	<p>It is respectfully submitted that the Learned Commission may kindly note the following views and suggestions while determining the ARR Proposal and also Tariff Proposals:</p> <p>(A) Discom has not followed a scientific approach to determine the revenue requirement, revenue and energy deficit and the figures on the above count are imaginary and intended to suite the requirements of the DISCOM.</p>	<p>The revenue requirement of the discoms has been computed to cover the following key components of costs-</p> <ol style="list-style-type: none"> 1. Power purchase costs 2. Distribution costs 3. State Transmission costs 4. PGCIL, ULDC and SLDC charges. 5. Consumer security deposits. 6. True-up/true-down of previous years <p>Revenue has been computed based on the category-wise sales forecast and the proposed tariff for each consumer category.</p> <p>Availability of power has been computed based on the availability furnished by the generators and market purchases. Energy deficit has been arrived based on the projected availability of power and demand from consumers.</p> <p>Hence the discoms have followed a methodical approach based on sound scientific principles in accordance with the 'Regulation no 4 of 2005 - Terms and Conditions for determination of wheeling and retail sale 'issued by the Hon Commission</p>
8.	<p>(B) The increased tariff by DISCOMS is artificial. In this connection it is essential to note that the Government in the State of Delhi and which came into power again has reduced the tariff by 50% and ordered audit of the DISCOMS to find out the correctness or otherwise of revenue and expenditure of the DISCOM. It is therefore necessary that the learned commission should contemplate issuing orders for audit of the DISCOMS</p>	<p>In the Tariff Order for FY 2013-14, the average Cost to Serve (CoS) as approved by the Hon'ble Commission for the Telangana was Rs 5.46/Unit. Since then, there has been a significant increase in the average CoS during the year and the licensee expects the trend to continue for the ensuing</p>

	<p>by the C&AG as is being done in state of DELHI and until such time, be pleased to direct that the present proposal to increase the rate to be held in abeyance.</p>	<p>year.</p> <p>The Licensee estimates the state level CoS for the year FY 2015-16 to be at Rs.5.98/Unit. This implies that an increase of Rs.0.52/ Unit (10 % increase)</p> <p>The increase in the CoS is due to the following reasons</p> <ol style="list-style-type: none"> 1. The Network cost approved in FY2013-14 was Rs.0.83/Unit and this has increased to Rs.1.00/Unit primarily due to increase in wages of employees, increased Capital Investment of the licensee. 2. The interest costs on the short term loans converted to Long term loan under Financial Restructure plan amounts to Rs.141 crore has also increased the ARR in FY2015-16. 3. The Licensees has projected a consolidated revenue deficit for FY2013-14 and FY2014-15 to the tune of Rs.1463 crore. The high revenue deficit for the period is primarily due to increase in Power Purchase cost, Network cost and other cost in FY2014-15 as there is no tariff revision in FY2014-15. <p>The Distribution licensee feels that the increased CoS should reflect appropriately in the tariff structure. Hence, the licensee proposed nominal tariff hike for various categories.</p>									
9.	<p>(C) The DISCOMS have not made any exercise in ascertaining and arresting energy pilferage with the result, the cost of the pilferage is passed on to the consumers and the DISCOMS are being let off and allowed to pass on the additional cost arising on account of their negligence on to the consumers.</p>	<p>TSSPDCL is making vigorous inspections and registered pilferage cases in its area. The cases booked and amount booked during First half of FY2014-15 is tabulated below.</p> <table border="1" data-bbox="1513 1222 2467 1412"> <thead> <tr> <th></th> <th>Apr-14 to June-14</th> <th>July-14 to Sep-14</th> </tr> </thead> <tbody> <tr> <td>No of services inspected</td> <td>189519</td> <td>140824</td> </tr> <tr> <td>No of cases booked</td> <td>29990</td> <td>29046</td> </tr> </tbody> </table>		Apr-14 to June-14	July-14 to Sep-14	No of services inspected	189519	140824	No of cases booked	29990	29046
	Apr-14 to June-14	July-14 to Sep-14									
No of services inspected	189519	140824									
No of cases booked	29990	29046									

		Multiple connections	138 clubbed into 52	148 clubbed into 46
		Direct Tapping	6343	5719
		Amount assessed & realised (in Lakhs)	107.92/34.61	133.34/30.32
		Meter bypassing	1509	1093
		Amount assessed & realised	552.39/173.54	249.46/98.94
		Supply utilised for UDC	1902	2278
		Amount assessed & realised	7.82/3.77	9.68/3.42
		Supply extended to other tariff Category	4858	4999
		Amount assessed & realised	184.44/114.88	299.68/120.17
		<p>The Licensee is working on actively cutting down losses. The Vigilance (DPE) wings are available in the DISCOMs who are exclusively conducting inspections to detect theft and any other unauthorized usage of supply by the consumers. The DPE wing is conducting the intensive inspections on high loss DTR areas along with Operation Engineers for verifications of bill stopped, UDC, Nil Consumption, not in use services and meter tamper services and conducting of special raids in rampet theft areas to register theft cases. Apart from the DPE wing, the operation staff are also registering cases wherever theft is noticed. In view of the above, all the necessary steps are being taken to curb the theft of energy in TSSPDCL.</p>		
10.	(D) DISCOMS are also silent on Metering of agricultural consumers and consequential impact of the same on other consumers.	TSSPDCL is adopting the ISI suggested methodology for estimating the Agriculture consumption in which the sample agriculture DTRs are metered and the sample will		

		vary for every six months so that, all the agriculture DTRs will be metered within a certain period.
11.	(E) Imposing TOD charges for the power consumed between 6pm and 10pm is indirect inflation of tariff and this has to be removed.	ToD tariff is mainly to reduce the overall peak demand in the system and also ensure Grid Discipline.
12.	(F) Resorting to short term purchase will burden the consumers of all categories. The Discoms by this time should have a long term plan but, every year, the Discoms resort to short term plans and burden the consumers and this is highly discriminating, irresponsible and without any concern for the suffering consumers. The Learned Commission may kindly take note of this concern and give appropriate directions to the Discoms for the long term plans and purchase of power at reasonable rates.	Based on the projected demand for the coming years, discoms are taking all measures for procurement of power under long term basis. Procuring 2000 MW of power on long term basis under competitive bidding is currently under progress. An MOU for procuring 1000 MW of power from Chattisgarh has already been signed.
13.	(G) The claims of the Discoms for recovery of the principal and interest thereon of the short-term loans during 2015-16 and/or thereafter from consumers through true-up or tariff as also FSA amounts from 2009-10 to 2011-12 are not permissible in the present application by the Discoms. The claim of FSA for this period is sub-judice before Hon'ble High Court and Supreme Court and so far as the claim for FY 2009-10 is concerned the same has been quashed by the Hon'ble High Court, therefore question of demanding the same once again indirectly does not arise and any such attempt shall be illegal, unjust and arbitrary.	The accumulated losses as on 31 st march 2013 has been considered under the FRP scheme which was designed by GOI. Discoms pray that the Honorable Commission permit this as these are the actual cost incurred by the discoms.
14.	(H) Though then erstwhile APERC directed the Discoms to resubmit their ARR and tariff proposals in view of bifurcation of the State with updated details, the Discoms did not do so as such, the Discoms by virtue of their default and omission should not be permitted to recover carrying cost of Rs.132 crore for the year 2014-15 from the consumers.	Due to bifurcation of the State, the Government of Telangana had issued orders for the constitution of Telangana State Electricity Regulatory Commission (TSERC) in Jul'14 and TSERC was constituted in Nov'14. Hence the discoms have submitted ARR and tariff proposals for FY2015 along with the projected revenue gap for FY2014-15.
15.	(I) The Objector is drawing power at 220KV with a CMD of 11,000KVA. The proposed increase of tariff under HT-III category is same on all the consumers irrespective of their voltage levels, which is totally, irrational and unreasonable and the said proposal is liable to be modified. The	The supply/flow of electricity at 11 kV & 33 kV levels in the distribution network of State is operated in radial mode, whereas the supply flow at 132 kV, 220 kV & 400 kV is operated in ring mode (integrated system). Eventhough the

<p>Discoms should have taken note of fact that the losses are very minimal at higher voltage levels, so the consumers drawing power at 220KV, cannot be treated and equated on par with those who draw at lower voltage levels. As such, it is necessary to levy reduced tariff on the consumers drawing power at 220KV level by passing the reduced transmission losses. At the same time, the DISCOMs should encourage the consumers by not increasing the existing tariff.</p>	<p>EHT network is consisting of 132 kV, 220 kV and 400 kV voltage systems, they are interconnected to each other to minimize interruptions and to have reliable supply. The feeders to the EHT services may be radial where as the EHT system as a whole operates in an integrated manner i.e. in other words called ring mode.</p> <p>The power flow path in the transmission system cannot be distinctly differentiated at different Voltage levels. In EHT system, the power can flow from lower to higher voltage or higher to lower voltage depending upon the physics of the system. The physics of the system determined the power flow path and hence entire EHT system losses can only be determined and voltage wise losses for each voltage level (i.e., 132 kV and 220 kV) cannot be determined separately.</p> <p>It is necessary to submit here that, the Power Grid Corporation of India Ltd. (PGCIL) also arrived one transmission loss for their system since it is also one integrated system although their system consists of 400 kV, 220 kV and 132 kV.</p> <p>Hence it is to submit that considering the uncertainty of power flow path in 132 kV and 220 kV voltage levels, considering the losses of entire EHT system at same quantum, uniform tariff is applicable to EHT system. While the losses at different levels of 11 kV and 33 kV being different (not integrated), the different levels of losses were taken into consideration and therefore the tariff also determined accordingly.</p>
---	--

S.No	Summary of Objections / Suggestions	Response of the Licensee
	27. Deccan Smiths Pvt. Ltd., Plot No.16, Phase-I, I.D.A., Mallapur, Hyderabad – 500 076	
4.	<p>It is respectfully submitted that industry generally has already become financially not viable due to increase in cost of material, men, tariffs and taxes, etc., with the result, everything is coming to a stand still more or less and there are no proper cash flows into the business. Therefore, by any unreasonable increase on the power tariff, industry generally will suffer and the units will face closure threat. Further increase of tariff by 1/- for TOD would be unjust to the industry and quite apart, it is discriminatory. It is therefore just and necessary that the learned commission may be pleased to examine the above issue and delete the TOD charges.</p>	<p>Discoms have proposed a modest tariff increase of 5.75% over and above the 2013-14 Commisison Approved Tariff. It may be noted that the tariff hike is effectively to cover the increase in costs for the the last two year period.</p> <p>Implementation of Time of Day (TOD) measure is a well known Demand Side Management (DSM) measure which is used across many states in India as well as abroad. Additional charge during peak hours is proposed to bring down the peak demand and consequently the procurement of high cost power by the discom may reduce.</p>
5.	<p>It is respectfully submitted that as per the proposal of the TSSPDCL, the aggregate revenue requirement for F.Y.2015-16 was stated to be Rs. 18,874.82 crores. TSSPDCL proposes to introduce tariff rationalisation across all categories and increase in tariffs as mentioned below:</p> <p>HT-I-Industrial</p> <p>The licensee would like to propose an increase in the Demand charges by 6% and an increase in Energy charges by 5.75% on existing tariff FY2015-16 for all the sub categories in HT-I for all voltage levels (11KV, 33KV, 132KV)</p> <p>Proposed Energy charge for HT-I:</p> <ul style="list-style-type: none"> - 132kv:Rs.5.12/unit - 33kv:Rs.5.55/unit - 11kv:Rs.6.00/unit <p>Time-of-Day Tariff (6PM to 10PM)</p> <ul style="list-style-type: none"> - 132kv and above:Rs.6.25 	<p>The revenue requirement of the discoms has been computed to cover the following key components of costs-</p> <ol style="list-style-type: none"> 1.Power purchase costs 2. Distribution costs 3. State Transmission costs 4. PGCIL,ULDC and SLDC charges. 5. Consumer security deposits. 6. True-up/true-down of previous years <p>Revenue has been computed based on the category-wise sales forecast and the proposed tariff for each consumer category.</p> <p>Availability of power has been computed based on the availability furnished by the generators and market purchases. Energy deficit has been arrived based on the projected availability of power and demand from consumers.</p>

	<ul style="list-style-type: none"> - 33kv:Rs.6.68 - 11kv:Rs.7.13 <p>Proposed Demand Charge: Rs.370.17/KVA/month</p>	Hence the discoms have followed a methodical approach based on sound scientific principles in accordance with the 'Regulation No.4 of 2005 (Terms and Conditions for Determination of Wheeling and Retail Sale of Electricity) issued by the Hon'ble Commission.
6.	It is respectfully submitted that the DISCOM proposed to increase the tariff by 5.75% on HT Industrial consumers and we are running our unit in loss due to increase in material cost, political unrest, increase in operational costs and the above proposal will drive us to run with huge losses and close the units.	
7.	<p>It is respectfully submitted that the Learned Commission may kindly note the following views and suggestions while determining the ARR Proposal and also Tariff Proposals:</p> <p>(A) Discom has not followed a scientific approach to determine the revenue requirement, revenue and energy deficit and the figures on the above count are imaginary and intended to suite the requirements of the DISCOM.</p>	Sales projections are made as per the historical sales data, upcoming loads which will have large impact in the sales, anticipated economic & climatic conditions, Govt. policies on industry, etc. The licensee is projecting sales with the acceptable scientific methods. The DISCOMs have projected the sales keeping in view of the economic condition of the districts after the bifurcation, increasing industrial activity, focus of new government on industries and commercial activities.
8.	(B) Compared to the previous years, the growth rate on actual ground has come down which is as per the statistics in the public domain. These facts have not been considered by the DISCOM for the energy deficit and power purchase.	
10.	(C) The increased tariff by DISCOMS is artificial. In this connection it is essential to note that the Government in the State of Delhi and which came into power again has reduced the tariff by 50% and ordered audit of the DISCOMS to find out the correctness or otherwise of revenue and expenditure of the DISCOM. It is therefore necessary that the learned commission should contemplate issuing orders for audit of the DISCOMS by the C&AG as is being done in state of DELHI and until such time, be	

	<p>pleased to direct that the present proposal to increase the rate to be held in abeyance.</p>	<p>The Licensee estimates the state level CoS for the year FY2015-16 to be at Rs. 5.98/Unit. This implies that an increase of Rs.0.52/Unit (10 % increase)</p> <p>The increase in the CoS is due to the following reasons</p> <ol style="list-style-type: none"> 1. The Network cost approved in FY2013-14 was Rs.0.83/Unit and this has increased to Rs.1.00 /Unit primarily due to increase in wages of employees, increased Capital Investment of the licensee. 2. The interest costs on the short term loans converted to Long term loan under Financial Restructure plan amounts to Rs.141 crore has also increased the ARR in FY2015-16. 3. The Licensees has projected a consolidated revenue deficit for FY2013-14 and FY2014-15 to the tune of Rs.1463 crore. The high revenue deficit for the period is primarily due to increase in Power Purchase cost, Network cost and other cost in FY2014-15 as there is no tariff revision in FY2014-15. <p>Hence, the Distribution licensee feels that the increased CoS should reflect appropriately in the tariff structure. Hence, the licensee proposed nominal tariff hike for various categories.</p>
11.	<p>(E) Private power producing companies are inflating the cost of coal and fuel etc., and thereby inflating the selling price of the power under power purchase agreements. This is going unchecked and DISCOMS are buying the power from these private companies without appreciating the artificial hiking of the Purchase price by these companies.</p>	<p>Determination of cost of coal and gas is not in the purview of Discoms. However the Discoms are procuring power through Short term and medium term sources duly followinh the rules and competitive bidding guidelines in vogue.</p>
12.	<p>(F) The very fact that there is no uniformity in the purchase price of power per unit from various companies reveal that the DISCOMS are not trying to scrutinize the reasonableness of the price being quoted by the power producers. It is therefore suggested to have a mechanization to ascertain that the Power producing companies do not make unreasonable gains at the cost of the energy consumers. The learned commission may also</p>	<p>The purchase price of power per unit of various sources can not be uniform as it depends on various factors such as nature of Fuel, the location at which the station located, the technology used, etc.</p>

	contemplate appointing scrutinizers, persons from consumer's side and independent technical consultants to audit the power producing companies to ensure that these companies do not inflate the cost and expenses and thereby make unreasonable gains.																																					
13.	(G) The DISCOMS have not made any exercise in ascertaining and arresting energy pilferage with the result, the cost of the pilferage is passed on to the consumers and the DISCOMS are being let off and allowed to pass on the additional cost arising on account of their negligence on to the consumers.	<p>TSSPDCL is making vigorous inspections and registered pilferage cases in its area. The cases booked and amount booked during First half of FY 2014-15 is tabulated below.</p> <table border="1" data-bbox="1516 456 2421 1256"> <thead> <tr> <th></th> <th>Apr-14 to June-14</th> <th>July-14 to Sep-14</th> </tr> </thead> <tbody> <tr> <td>No of services inspected</td> <td>189519</td> <td>140824</td> </tr> <tr> <td>No of cases booked</td> <td>29990</td> <td>29046</td> </tr> <tr> <td>Multiple connections</td> <td>138 clubbed into 52</td> <td>148 clubbed into 46</td> </tr> <tr> <td>Direct Tapping</td> <td>6343</td> <td>5719</td> </tr> <tr> <td>Amount assessed & realised (in Lakhs)</td> <td>107.92/34.61</td> <td>133.34/30.32</td> </tr> <tr> <td>Meter bypassing</td> <td>1509</td> <td>1093</td> </tr> <tr> <td>Amount assessed & realised</td> <td>552.39/173.54</td> <td>249.46/98.94</td> </tr> <tr> <td>Supply utilised for UDC</td> <td>1902</td> <td>2278</td> </tr> <tr> <td>Amount assessed & realised</td> <td>7.82/3.77</td> <td>9.68/3.42</td> </tr> <tr> <td>Supply extended to other tariff Category</td> <td>4858</td> <td>4999</td> </tr> <tr> <td>Amount assessed & realised</td> <td>184.44/114.88</td> <td>299.68/120.17</td> </tr> </tbody> </table> <p>The Licensee is working on actively cutting down losses. The Vigilance (DPE) wings are available in the DISCOMs who are exclusively conducting inspections to detect theft and any other unauthorized usage of supply by the consumers. The</p>		Apr-14 to June-14	July-14 to Sep-14	No of services inspected	189519	140824	No of cases booked	29990	29046	Multiple connections	138 clubbed into 52	148 clubbed into 46	Direct Tapping	6343	5719	Amount assessed & realised (in Lakhs)	107.92/34.61	133.34/30.32	Meter bypassing	1509	1093	Amount assessed & realised	552.39/173.54	249.46/98.94	Supply utilised for UDC	1902	2278	Amount assessed & realised	7.82/3.77	9.68/3.42	Supply extended to other tariff Category	4858	4999	Amount assessed & realised	184.44/114.88	299.68/120.17
	Apr-14 to June-14	July-14 to Sep-14																																				
No of services inspected	189519	140824																																				
No of cases booked	29990	29046																																				
Multiple connections	138 clubbed into 52	148 clubbed into 46																																				
Direct Tapping	6343	5719																																				
Amount assessed & realised (in Lakhs)	107.92/34.61	133.34/30.32																																				
Meter bypassing	1509	1093																																				
Amount assessed & realised	552.39/173.54	249.46/98.94																																				
Supply utilised for UDC	1902	2278																																				
Amount assessed & realised	7.82/3.77	9.68/3.42																																				
Supply extended to other tariff Category	4858	4999																																				
Amount assessed & realised	184.44/114.88	299.68/120.17																																				

		DPE wing is conducting the intensive inspections on high loss DTR areas along with Operation Engineers for verifications of bill stopped, UDC, Nil Consumption, not in use services and meter tamper services and conducting of special raids in rampet theft areas to register theft cases. Apart from the DPE wing, the operation staff are also registering cases wherever theft is noticed. In view of the above, all the necessary steps are being taken to curb the theft of energy in TSSPDCL
14.	(H) DISCOMS are also silent on Metering of agricultural consumers and consequential impact of the same on other consumers.	TSSPDCL is adopting the ISI suggested methodology for estimating the Agriculture consumption in which the sample agriculture DTRs are metered and the sample will vary for every six months so that, all the agriculture DTRs will be metered within a certain period.
15.	(I) The learned commission's directives contained in tariff order for the year 2013 and 14 have not been complied with substantially by the DISCOM and its replies to the compliance of the above directive are evasive in most of the cases and on this count alone, the present ARR and Tariff proposal for to2015-16 could be held in abeyance till the Directives issued by the learned commission have been substantially complied with by the DISCOM. In this regard it is suggested that the learned commission may kindly appoint a committee with the representatives of each category of Consumers apart from the other members of repute and calibre to study and give a report on the compliance of the Directives of this learned commission by the DISCOM. For instance some directives of the learned commission reproduced by the TSSPDCL in its ARR & Tariff proposal for the FY2015-16 under FRESH DIRECTIVES at page no.88 TO 97 however, they have not been complied with by the Discom. It is also submitted that some of the directives issued by the Learned Commission in its order for the financial year 2012 – 2013 have also not been complied with by the Discom till date and it is evidenced by the statements of the Discom in it proposal for the financial year 2015 – 2016.	It is to inform that the directives issued by the Hon'ble Commission are complied and TSSPDCL is submitting the compliance report to the Hon Commission.
	(J) The Discoms are imposing interest for whole month in the event of	Delay payment surcharge is charged at the rates as specified

	<p>delay in payment of bills irrespective of the actual quantum of the delay. Even for a single day's delay, DISCOM's are imposing interest for full month which is arbitrary and against the equity and highly unreasonable. It is therefore suggested that the interest should be charged in proportion to the actual delay but not in terms of the full month for delay of any fraction of the month.</p>	<p>by the Commission mentioned in the Tariff Order 2013-14</p>																							
	<p>(K) Imposing TOD charges for the power consumed between 6 pm and 10 pm is indirect inflation of tariff and this has to be removed.</p>	<p>ToD tariff is mainly to reduce the overall peak demand in the system and also ensure Grid Discipline.</p>																							
	<p>(L) There are differences in the revenue loss shown to have occurred for 2013 – 2014 but the figures do not match as shown in the petition more particularly with reference to Rs.2135 crore in case of TSSPDCL and this needs to be explained by the DISCOMs.</p>	<p>The revenue loss of Rs. 2135 crores for FY2013-14 is arrived in the following manner (in Rs. Crores)</p> <table border="1" data-bbox="1516 605 2421 873"> <thead> <tr> <th colspan="2">Tariff order</th> <th colspan="2">Actual</th> <th colspan="3">Variance</th> </tr> <tr> <th>Tariff Revenue</th> <th>Non-Tariff Income</th> <th>Tariff Revenue</th> <th>Non-Tariff Income</th> <th>Tariff Revenue</th> <th>Non-Tariff Income</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>16172.86</td> <td>98</td> <td>14120</td> <td>15.66</td> <td>2052.86</td> <td>82.34</td> <td>2135.2</td> </tr> </tbody> </table>	Tariff order		Actual		Variance			Tariff Revenue	Non-Tariff Income	Tariff Revenue	Non-Tariff Income	Tariff Revenue	Non-Tariff Income	Total	16172.86	98	14120	15.66	2052.86	82.34	2135.2		
Tariff order		Actual		Variance																					
Tariff Revenue	Non-Tariff Income	Tariff Revenue	Non-Tariff Income	Tariff Revenue	Non-Tariff Income	Total																			
16172.86	98	14120	15.66	2052.86	82.34	2135.2																			
	<p>(N) The sales reduction is shown as 12.97% in the petition but the same does not tally with the figures shown in tables and other places.</p>	<p>The sales reduction shown as 12.97% pertains to reduction in metered sales in FY2013-14 against the Tariff order approved sales. The same table shown in the filings with variance column addition is shown below</p> <table border="1" data-bbox="1516 1024 2381 1377"> <thead> <tr> <th rowspan="3">Particulars</th> <th colspan="4">2013-14 (APCPDCL)</th> </tr> <tr> <th>APERC Order</th> <th>Actuals</th> <th colspan="2">Variance</th> </tr> <tr> <th>MU</th> <th>MU</th> <th>MU</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Metered Sales</td> <td>26061.59</td> <td>22679.24</td> <td>(3382.35)</td> <td>(12.97)</td> </tr> <tr> <td>LT Agricultural Sales</td> <td>8073.9</td> <td>9190.49</td> <td>116.59</td> <td>13.82</td> </tr> </tbody> </table>	Particulars	2013-14 (APCPDCL)				APERC Order	Actuals	Variance		MU	MU	MU	%	Metered Sales	26061.59	22679.24	(3382.35)	(12.97)	LT Agricultural Sales	8073.9	9190.49	116.59	13.82
Particulars	2013-14 (APCPDCL)																								
	APERC Order	Actuals		Variance																					
	MU	MU	MU	%																					
Metered Sales	26061.59	22679.24	(3382.35)	(12.97)																					
LT Agricultural Sales	8073.9	9190.49	116.59	13.82																					
	<p>(O) The estimated gap in the prayer is 1293.56 crores for the year under</p>	<p>The estimated gap in the Prayer of Rs.1283.56 crores for the</p>																							

<p>review and the same does not match with the figures provided in the table in the petition. No rational was given for posing a tariff to consumers who consume less than 200 units and who consume more than 200 units.</p>	<p>year FY2014-15 pertains to TSSPDCL excluding Anantapur & Kurnool gap which is shown in the following table</p> <table border="1" data-bbox="1526 266 2429 1068"> <thead> <tr> <th data-bbox="1526 266 1924 380" rowspan="2">Revenue Deficit / Surplus (Rs. Crs.)</th> <th colspan="3" data-bbox="1924 266 2429 305">2014-15</th> </tr> <tr> <th data-bbox="1924 305 2104 380">TSSPDCL</th> <th data-bbox="2104 305 2260 380">ATP & KNL</th> <th data-bbox="2260 305 2429 380">Total</th> </tr> </thead> <tbody> <tr> <td data-bbox="1526 380 1924 456">Aggregate Revenue Requirement (Rs. Crs.)</td> <td data-bbox="1924 380 2104 456">16086</td> <td data-bbox="2104 380 2260 456">590</td> <td data-bbox="2260 380 2429 456">16676</td> </tr> <tr> <td data-bbox="1526 456 1924 532">Revenue from Current Tariffs (Rs. Crs.)</td> <td data-bbox="1924 456 2104 532">13339</td> <td data-bbox="2104 456 2260 532">429</td> <td data-bbox="2260 456 2429 532">13767</td> </tr> <tr> <td data-bbox="1526 532 1924 609">Non - Tariff Income (Rs. Crs.)</td> <td data-bbox="1924 532 2104 609">12</td> <td data-bbox="2104 532 2260 609">1</td> <td data-bbox="2260 532 2429 609">13</td> </tr> <tr> <td data-bbox="1526 609 1924 685">Revenue from Wheeling (Rs. Crs.)</td> <td data-bbox="1924 609 2104 685">-</td> <td data-bbox="2104 609 2260 685">-</td> <td data-bbox="2260 609 2429 685">-</td> </tr> <tr> <td data-bbox="1526 685 1924 794">Revenue Deficit(-) / Surplus(+) at Current Tariffs (Rs. Crs.)</td> <td data-bbox="1924 685 2104 794">(2735)</td> <td data-bbox="2104 685 2260 794">(161)</td> <td data-bbox="2260 685 2429 794">(2896)</td> </tr> <tr> <td data-bbox="1526 794 1924 837">Subsidy</td> <td data-bbox="1924 794 2104 837">1585</td> <td data-bbox="2104 794 2260 837">62</td> <td data-bbox="2260 794 2429 837">1647</td> </tr> <tr> <td data-bbox="1526 837 1924 914">Net gap- Deficit(-) / Surplus</td> <td data-bbox="1924 837 2104 914">(1151)</td> <td data-bbox="2104 837 2260 914">(99)</td> <td data-bbox="2260 837 2429 914">(1250)</td> </tr> <tr> <td data-bbox="1526 914 1924 990">Carrying Cost @ 11.5% p.a.</td> <td data-bbox="1924 914 2104 990">132</td> <td data-bbox="2104 914 2260 990"></td> <td data-bbox="2260 914 2429 990"></td> </tr> <tr> <td data-bbox="1526 990 1924 1068">Total Gap including Carrying Cost</td> <td data-bbox="1924 990 2104 1068">1283</td> <td data-bbox="2104 990 2260 1068"></td> <td data-bbox="2260 990 2429 1068"></td> </tr> </tbody> </table>	Revenue Deficit / Surplus (Rs. Crs.)	2014-15			TSSPDCL	ATP & KNL	Total	Aggregate Revenue Requirement (Rs. Crs.)	16086	590	16676	Revenue from Current Tariffs (Rs. Crs.)	13339	429	13767	Non - Tariff Income (Rs. Crs.)	12	1	13	Revenue from Wheeling (Rs. Crs.)	-	-	-	Revenue Deficit(-) / Surplus(+) at Current Tariffs (Rs. Crs.)	(2735)	(161)	(2896)	Subsidy	1585	62	1647	Net gap- Deficit(-) / Surplus	(1151)	(99)	(1250)	Carrying Cost @ 11.5% p.a.	132			Total Gap including Carrying Cost	1283		
Revenue Deficit / Surplus (Rs. Crs.)	2014-15																																											
	TSSPDCL	ATP & KNL	Total																																									
Aggregate Revenue Requirement (Rs. Crs.)	16086	590	16676																																									
Revenue from Current Tariffs (Rs. Crs.)	13339	429	13767																																									
Non - Tariff Income (Rs. Crs.)	12	1	13																																									
Revenue from Wheeling (Rs. Crs.)	-	-	-																																									
Revenue Deficit(-) / Surplus(+) at Current Tariffs (Rs. Crs.)	(2735)	(161)	(2896)																																									
Subsidy	1585	62	1647																																									
Net gap- Deficit(-) / Surplus	(1151)	(99)	(1250)																																									
Carrying Cost @ 11.5% p.a.	132																																											
Total Gap including Carrying Cost	1283																																											
<p>(P) The cost of service is not reflected in the tariff proposed for both the domestic and industrial.</p>	<p>With regard to the reflection of CoS in the Tariff it is to inform that the the tariff need not be the mirror image of actual cost of supply or voltage-wise cost of supply.</p> <p>The Hon'ble Tribunal in various appeals held as under “ However, we are not suggesting that the tariffs should have been fixed as mirror image of actual cost of supply or voltage-wise cost of supply or that the cross subsidy with respect to voltage-wise cost of supply should have been within ±20% of the cost of supply at the respective voltage of supply”.</p>																																											

		The legislature by amending Section 61(g) of the Electricity Act by Act 26 of 2007 by deleting the word 'eliminating cross subsidies' has expressed its intent that cross subsidies may not be eliminated.
	(O) Resorting to short term purchase will burden the consumers of all categories. The Discoms by this time should have a long term plan but, every year, the Discoms resort to short term plans and burden the consumers and this is highly discriminating, irresponsible and without any concern for the suffering consumers. The Learned Commission may kindly take note of this concern and give appropriate directions to the Discoms for the long term plans and purchase of power at reasonable rates.	Based on the projected demand for the coming years, discoms are taking all measures for procurement of power under long term basis. Procuring 2000 MW of power on long term basis under competitive bidding is currently under progress. An MOU for procuring 1000 MW of power from Chattisgarh has already been signed.
	(R) The claims of the Discoms for recovery of the principal and interest thereon of the short-term loans during 2015-16 and/or thereafter from consumers through true-up or tariff as also FSA amounts from 2009-10 to 2011-12 are not permissible in the present application by the Discoms.	The accumulated losses as on 31 st march 2013 has been considered under the FRP scheme which was designed by GOI. Discoms pray that the Honorable Commission permit this as these are the actual cost incurred by the discoms.
	(S) Though the erstwhile APERC directed the Discoms to resubmit their ARR and tariff proposals in view of bifurcation of the State with updated details, the Discoms did not do so as such, the Discoms by virtue of their default and omission should not be permitted to recover carrying cost of Rs.132 crore for the year 2014-15 from the consumers.	Due to bifurcation of the State, the Government of Telangana had issued orders for the constitution of Telangana State Electricity Regulatory Commission (TSERC) in Jul'14 and TSERC was constituted in Nov'14. Hence the discoms have submitted ARR and tariff proposals for FY2015 along with the projected revenue gap for FY2014-15.
	(T) Discoms have shown agricultural consumption exceeding the levels permitted by the Commission by 406 MU for TSNPDCL and an increase for 2014-15 to 37.28% from 32.87% in 2013-14; and by 1116.57 MU for TSSPDCL for the year 2013-14 and an increase for 2014-15 to 22.98% from 20.95% in 2013-14. Since the Government is giving subsidy including cross subsidy, the Commission should not permit true-up of expenditure for revised excess consumption for agriculture and the same should be provided as additional subsidy by the Government. Since the Government has agreed to provide substantial subsidy for 2015-16, the Discoms should explain what the above said subsidy covers and in the absence of the	Estimation of agricultural sales is based on the ISI methodology outlined by the Hon'ble Commission. Licensees are obligated to provide supply to all categories of consumers, including subsidised consumers. As per the National Tariff Policy, the tariffs to the consumers are to be fixed at +/- 20% of COS. Hence it is deemed that the consumers whose tariffs are fixed over and above COS will cross subsidise the consumers whose tariffs are below COS to ensure revenue neutrality.

	<p>same, it has to be presumed that the same covers expenditure for revised excess consumption for agriculture.</p>	<p>Any other revenue deficit after adjusting cross subsidy will be met through Government Subsidy.</p> <p>The projected revenue gap of the discom has to be met through revenue from tariffs and government subsidy.</p>
--	---	--

S.No	Summary of Objections / Suggestions	Response of the Licensee									
	28. M.K. Gupta, Chief Electrical Distribution Engineer, South Central Railway, IV floor, Rail Nilayam, Secunderabad – 500 071										
1	<p>4.0 Proposed Railway Traction tariff : Traction tariff has been proposed in two parts i.e. Rs.370.17 per kVA as demand charges & Rs.7.65 per kVAh of energy (equivalent to average of Rs.8.94 per unit approx.) instead of existing single part tariff of Rs.6.36 per kVAh of energy.</p> <p>4.1 It is submitted that the Railway traction tariff before converted to single part in January 1992 Railway traction tariff and HT-I tariff were same. While converting the Railway traction tariff from two part to the single part the element of demand charges were included in the energy charges and, thereafter, the traction tariff was fixed up. The DISCOM's decision about implementation of two part tariff for Railway traction of Rs. 370.17 per KVA & Rs. 7.65 per KVAh is not based on realistic study which may be seen and appreciated from the facts and figures given below.</p> <table border="1" data-bbox="360 764 1534 963"> <thead> <tr> <th>Year</th> <th>Demand charges Rs per KVA</th> <th>Energy Charges Rs per unit</th> </tr> </thead> <tbody> <tr> <td>2014-15</td> <td>Nil</td> <td>6.36</td> </tr> <tr> <td>Proposed in the year 2015-16</td> <td>370.17</td> <td>7.65</td> </tr> </tbody> </table> <p>The energy charges is already increased by 20% and in addition to that traction tariff has been proposed in two parts and demand charges of Rs.370.17/KVA/Month which is equivalent to Rs.1.29/ unit is enormously increased.</p> <p>As already brought out earlier, additional burden for the Railways is to the tune of Rs. 2.58 per unit and increase of 40.57% with respect to the previous year. As such, Hon'ble TSERC may kindly review imposition of two part tariff for the Railway traction and the corresponding increase.</p>	Year	Demand charges Rs per KVA	Energy Charges Rs per unit	2014-15	Nil	6.36	Proposed in the year 2015-16	370.17	7.65	<p>Due to the increase in average cost of service from Rs.5.25/Unit as approved in Tariff Order 2013-14 to Rs.5.90/Unit as filed in ARR for FY2015-16 for TSPDCL, the Licensee is obligated to increase Tariff nominally for FY2015-16.</p> <p>The increase in CoS is mainly because of increase in Power Purchase cost, increased Network Cost, considering of gains/losses upto FY2013-14 and considering of Revenue deficit for the Retail Supply business for FY2014-15.</p> <p>Increase in the power purchase cost and corresponding cost of service lead to a revenue gap of Rs.3512 crore for the FY2015-16. To reduce this revenue gap, the licensees are undertaking several energy conservation and loss reduction activities. But, without realistic revision in tariffs, these steps would fall short in bridging the revenue gap. Hence the licensees propose the tariff revisions.</p>
Year	Demand charges Rs per KVA	Energy Charges Rs per unit									
2014-15	Nil	6.36									
Proposed in the year 2015-16	370.17	7.65									
	<p>5.0 Tariff Structure of Railway traction: In fact the Railway traction tariff was a two part tariff till 31.12.1991 and was converted to the single part tariff from 1.1.1992 onwards considering the</p>	<p>The demand charges are meant for meeting the costs involved for making the availability of the require power in MW/MVA at the premises of the consumer</p>									

<p>requirements and prolonged correspondence with the then APSEB. Single part tariff avoided complications of the actual demand recorded versus demand that gets imposed due to unavoidable feed extension from adjacent traction sub-station arising from:</p> <ul style="list-style-type: none"> i) Failure of 132 KV incoming supply. ii) Maintenance/Outage in transmission lines and other equipments. <p>The system of single part tariff has worked satisfactorily and no issue has been raised by the then APSEB and DISCOMs from 1992 to till date.</p> <p>5.1 For any given level of train services the overall demand on the system will not change. If it increases at one traction sub station it will reduce at the adjacent traction sub station as the trains move on. Reverting to two part tariff for the Railway traction as now proposed during the year 2015-16 will cause earlier complications to resurface, where load of one substation gets transferred to other substation due to one or the other reason and in turn recorded maximum demands shoots up temporarily; since there is no change in the working system. Single part tariff is indeed the most appropriate tariff for the Railway traction.</p>	<p>round the clock. Demand charges include the fixed cost of network involved in transmitting the power and the fixed cost of the generators which have contract with the licensees to generate that power.</p>																				
<p>6.0 <u>Cost of Service for Railway Traction:</u> The proposed Cost of service for Railway Traction for 2015-16 is as follows:</p> <table border="1" data-bbox="284 878 1454 1036"> <tr> <td>Discom</td> <td>Cost of Service Rs/KWH</td> </tr> <tr> <td>TSSPDCL</td> <td>5.07</td> </tr> <tr> <td>TSNPDCL</td> <td>5.33</td> </tr> <tr> <td>Average</td> <td>5.20</td> </tr> </table> <p>The COS is being calculated in terms of KWh and energy is being charged for Railway traction in terms of KVAh.</p> <p>The comparison of cost of service for Railway traction and tariff for Railway traction (HT-V category) is given below.</p> <table border="1" data-bbox="284 1219 1454 1404"> <thead> <tr> <th colspan="4">Cost of Service for Railway traction</th> <th colspan="2">Traction tariff Rs/KVAh</th> </tr> <tr> <th>Year</th> <th>TSSPDC L Rs/KWh</th> <th>TSNPDCL Rs./KWh</th> <th>Average Rs./KWh</th> <th>Demand charges Rs./ KVA</th> <th>Energy charges Rs.KVAh</th> </tr> </thead> </table>	Discom	Cost of Service Rs/KWH	TSSPDCL	5.07	TSNPDCL	5.33	Average	5.20	Cost of Service for Railway traction				Traction tariff Rs/KVAh		Year	TSSPDC L Rs/KWh	TSNPDCL Rs./KWh	Average Rs./KWh	Demand charges Rs./ KVA	Energy charges Rs.KVAh	<p>With regard to the comparison of CoS w.r.t. the Tariff, it is to inform that the the tariff need not be the mirror image of actual cost of supply or voltage-wise cost of supply.</p> <p>The Hon'ble Tribunal in various appeals held as under "However, we are not suggesting that the tariffs should have been fixed as mirror image of actual cost of supply or voltage-wise cost of supply or that the cross subsidy with respect to voltage-wise cost of supply should have been within $\pm 20\%$ of the cost of supply at the respective voltage of supply. The legislature by amending Section 61(g) of the Electricity Act by Act 26 of 2007 by substituting 'eliminating cross subsidies' has expressed its intent that cross subsidies may not be eliminated.</p>
Discom	Cost of Service Rs/KWH																				
TSSPDCL	5.07																				
TSNPDCL	5.33																				
Average	5.20																				
Cost of Service for Railway traction				Traction tariff Rs/KVAh																	
Year	TSSPDC L Rs/KWh	TSNPDCL Rs./KWh	Average Rs./KWh	Demand charges Rs./ KVA	Energy charges Rs.KVAh																

				month	
2013-14	4.82	4.92	4.87	Nil	6.36
2015-16	5.07	5.33	5.20	370.17	7.65
Variation from 2013-14 to 2015-16	5.19%	8.33%	6.78%	40.57% Equivalent to Rs. 8.94/KVAh	

From above, it may be seen that the traction tariff is enormously increased by 40.57% over existing tariff and where as the cost of service increased only 6.78% tariff which is highly unjustified.

It is also brought to your kind notice, it may be seen that the traction tariff (Equivalent to Rs. 8.94/Kvah) is higher by 72% over average cost of service (rs. 5.20/Kwh) which is against to National Tariff policy

8.0 Comparison of Traction Tariff with HT-I category:
The proposed tariff for HT-1 category - 132 KV (Industries) for the year 2015-16 is Rs. 370.17 /KVA/Month as demand charges and Rs. 5.12 per KVAh and equivalent to Rs.5.98 per unit approximately (Details of calculations enclosed in Annexure-I).

The proposed Railway traction tariff of Rs. 8.94 per unit is substantially higher than the HT-1 category by Rs.2.96 paise (49.5%) despite the fact that both are availing supply at same voltage level. As brought out in Para 3.0, the Railway draws substantial supply during off peak period also, thus helping in improving base load and supporting the grid stability. Charging of such higher tariff from Railway is irrational and unjustified. The Railways being a public utility organization, charging at unreasonably higher rates is unjustified.

It is also submitted that before the tariff was converted to single part in January 1992, the Railway traction tariff and HT-I tariff were same. The revision which took place has exempted Railway traction from the demand charges but resulted into a higher tariff than tariff for HT-I category due to load pattern of Railways. The same trend is continued till now and Railway traction tariff is being fixed always higher than HT- I category.

The DISCOM's decision about implementation of two part tariff for Railway traction

Distinction between various consumers is as per the section 62(3) of the Act such as "load factor, power factor, voltage, total consumption of electricity etc. When the differentiation is based on the factors postulated in sub-Section (3) of Section 62 of the Act, the distinction cannot be challenged. The consumers falling in different categories cannot claim to be treated alike. Hence, the distinction between the Railways and the Industrial Consumers cannot be made.

Further it is pertinent to mention here that Railways is not being subjected to power cuts which are imposed on other HT consumers during FY 2012-13 and FY 2013-14. The benefit to the Railways by way of exemption in power cuts cannot be measured in monetary terms but undoubtedly it is huge. Further Time of Day (ToD) tariff for HT consumers has been in vogue in the state. Under this scheme of tariff, consumers are liable to pay Rs 1 per unit is levible on

of Rs. 370.17 per KVA & Rs. 7.65 per KVAh is not based on realistic study which may be seen and appreciated from the facts and figures given below.

Details of Railway traction tariff HT –I Industry

Traction tariff			HT-I category (Industry)	
	Demand charges Rs per KVA	Energy Charges Rs per unit	Demand charges Rs per KVA	Energy Charges Rs per unit
As on 31.12.91	55	1.15	55	115
As on date	Nil	6.36	350	4.90
Proposed in the year 2015-16	370.17	7.65	370.17	5.12
Increase	40.57%		4.36%	

During the year 2015-16 not only traction tariff has been proposed in two parts but energy charges have also been increased enormously which is not justified.

Hon'ble commission is requested to examine the preferential treatment to HT-I category which is highly unjustifiable.

Fixation of higher tariff for Railway traction is also in violation to the provisions of Article 287 (b) of Constitution of India which categorically stipulates that "the price of electricity sold to the Government of India for consumption by that Government or to any such Railway company as aforesaid for consumption in the construction, maintenance or operation of any Railway, shall be less by the amount of the tax than the price charged to other consumers as a substantial quantity of electricity".

9.0 Comparison of Railway traction with HT-I (B) :

Under HT-I (B) Category Ferro alloys proposed with Rs.4.84 /Unit as single part as per ARR of 2015-16. The Railway traction tariff is proposed at Rs. 8.94 is higher than 85% over tariff proposed for HT-I (B) Ferro Alloys category. More over the tariff for HT-I (B) ferro alloys kept single part tariff only.

energy consumption during the period from 6.00PM to 10.00 PM. The Railways is also exempted from this Time of Day tariff and gets supply at normal rate for usage of power through out the day. Thus, the Railways are benefited from supply side as compared to the other HT consumers as they are enjoying the uninterrupted power supply.

It is to submit that Article 287 of the Constitution of India deals with exemption of tax on consumption of electricity and it bars any State Government to impose tax on the consumption of electricity by the Railways. The Tariff determined by the Hon APERC is in accordance with Electricity Act 2003 which is a Central Act passed by the Parliament.

The Hon APTEL in Appeal No.75 of 2011 dealt with this subject in an appeal between Union of India through, Southern Railway Versus Tamil Nadu Electricity Regulatory Commission and Tamil Nadu Electricity Board and the Hon'ble APTEL decided this against the Appellant which is squarely applicable to this petition also.

However the Railways are exempted from Electricity Duty as per the APED act 1939.

The Hon'ble Commission under Sub-section 3 of Section 62 of the 'Act' while determining the tariff has been empowered to treat the consumers differently on the basis of the load factor, power factor, voltage, total consumption of electricity during any specified

Category	Supply availin g	Type of Industry	Organiza- tion	Effect on environ- ment	Pro. tariff for 2015-16
Ferro Alloys	132 KV	Power Intensive	Productio n oriented	--	Rs.4.84
Railway Traction	132 KV	Power Intensive	Public service	Energy efficient and eco friendly	Rs.8.94 (Equivalent to Rs.370.17/KV A &Rs.7.65/KVA h)

Except load factor, Ferro Alloys has no other advantages over Railways. Contribution of Railways to economic and social developments of country far outweighs the higher load factor of Ferro Alloys. It is brought to the kind notice of commission that load factor of Railways is showing an upward trend due to introduction of intermediate block section with the help of IB signals. This enables running of more trains and hence higher load factor.

Hon'ble commission is requested to critically examine the preferential treatment / subsidy given to Ferro Alloys which is unjustifiable and against basic principles of Electricity Act 2003 (section 61).

10.0 Extension of Subsidy to certain categories – Request for Deletion:
Section 61(g) of Electricity Act 2003 stipulate that “the tariff progressively reflects the cost of supply of electricity, and also reduces and eliminates cross- subsidies within the period to be specified by the appropriate commission.”

From the cost of service and tariff models of the various DISCOMs, it is noted that certain categories have been heavily subsidized and the cross subsidy is charged to other consumers like Railways. This needs to be eliminated as per the stipulation under Section 61 (g) of the Electricity Act, 2003.

Hon'ble Commission is requested to fix tariff reasonably for HT-V category. Cross-subsidy element being charged heavily to Railways is unjustified and as it is

period or the time at which the supply is required or the geographical position of any area, nature of supply and *the purposes for which the supply is required.*

When the differentiation is based on the factors postulated in sub-Section (3) of Section 62 of the Act, the distinction cannot be challenged. Distinction between various consumers on the basis of load factor, power factor, voltage, total consumption of electricity etc. is not without difference. The consumers falling in different categories cannot claim to be treated alike. Hence, the distinction between the Railways and the Ferro Alloy Consumers cannot be faulted.

It is pertinent to mention here that the Ferro alloy units at present are on tariff condition of “*guaranteed energy off-take at 6701/kVAh per kVA per annum on average contracted demand or average actual demand maximum demand, whichever is higher. The energy falling short of 6701 kVAh per kVA per annum will be billed as deemed consumption*”.

The section 61 (g) of the E.Act-2003 is amended by Act 26 of 2007 wherein the word elimination of cross-subsidies was removed and the same is reproduced here “the tariff progressively reflects the cost of supply of electricity, and also reduces the cross-subsidies in the manner specified by the appropriate commission.”

The legislature by amending Section 61(g) of the Electricity Act by Act 26 of 2007 has expressed its intent that cross subsidies may not be eliminated.”

required to be reduced to zero gradually.	
<p>11.0 Discrimination against Railway traction: According to ARR of Discoms while proposing the tariffs for all consumers/categories the increase is 5.75% where as for Railway traction, the proposed increase is 40.57% without any specific reason. This clearly indicates the discrimination shown against HT- V category –Railway traction tariff and at the same time preferential treatment is giving for other consumers like Ht-I (A) and (B) is not unjustified and which violates the section 45 (4) of Electricity Act 2003.</p> <p>Electricity Act 2003 Section 45 (4), stipulates that “Subject to the provisions of section 62, in fixing charges under this section a distribution licensee shall not show undue preference to any person or class of persons or discrimination against any person or class of persons”.</p> <p>Hon’ble commission is requested to consider this aspect while fixing the tariff for railway traction and other consumers.</p>	COS
<p>Electrification of more sections in Telangana : By way of electrification of Railway network in Telangana additional infrastructure will be added, resulting into faster movement of goods and passenger traffic. Ultimately there is every possibility of upcoming industries in the area of backward region like Nalgonda, Karimnagar and Nizamad districts in newly formed Telangana.</p> <p>Electrification of MMTS pahase – II, Bibinagar – Nadikudi, 3rd line of Ballarsha – Madhira (Ballarsha-Kazipet-Vijayawada section), Bhongir – Secunderabad (Additional two lines) are under progress and Peddapalli-Karimnagar-Jagityala, Mudkhed-Medchal, Falaknuma–Mahaboobnagar- Gadwal (Manmad-Mudkhed-Dhone section) sections have been sanctioned for electrification in recent Railway Budget 15-16 for Telangana state. Total 98 Route Kms of Railway Electrification is under progress in newly formed Telangana and another 563 Route Kms of section is sanctioned for electrification in recent budget</p> <p>Higher traction tariff slashes Rate of Return (ROR) for the electrification projects and making them non-viable.</p> <p>Hon’ble commission is requested to consider the above and fix traction tariff</p>	In the purview of Hon’ble Commission.

	<p>reasonably. A view can be taken by commission for adopting a rebate of 10% of energy charges for 5 years from date of commissioning of new electrification projects as done in MP state.</p>	
	<p><u>Incentive on Prompt/early payment:</u> Railways are prompt in payment of energy bills to the DISCOMs and for these, Railways certainly deserve some rebate/incentive. Reasonable rebate/incentive for prompt payment be granted as done by other SERC viz. MERC, OERC, MPERC etc</p>	<p>Not in the purview of the Licensee</p>

S.No	Summary of Objections / Suggestions	Response of the Licensee
	29. M.Kodanda Reddy, Chairman, telangana Kisan-Kheth Mazdoor congress, Gandhi Bhavan, Nampally, Hyderabad.	
2.1	Farmers are being vilified as being the source of problems facing the power sector in the State principally because of free power supply to agriculture pump sets assured by the government. Here it has to be empathetically noted that even though, most of the farmers with electrified pump sets get free power, DISCOMs in the State do not supply it free as they receive the cost incurred in supplying electricity to pump set farmers in the form of subsidy from the State government and cross subsidy from subsidizing industrial and commercial consumers. The DISCOMs are duty bound to supply quality power to pump set farmers. But these farmers are at the receiving end.	TSDiscoms are taking adequate steps to supply quality power to agriculture pump sets.
2.2	In Telangana State more land is being irrigated by wells compared to surface/canal irrigation. Free power to agriculture was promised to keep the pump set farmers on equal footing with farmers under surface irrigation. Even the budgetary allocation to power sector is always less than irrigation sector. For example, in the budget of undivided AP for the year 2014-15 while only Rs. 8,454.48 crore were allocated to power sector irrigation sector got Rs. 23,311.98 crore. At the same time it has to be kept in mind that only a portion of allocation to power sector goes towards subsidizing power supplied to agriculture pump sets.	Noted
	Estimation of agriculture consumption	

		2013-14	2014-15	2015-16	
	NPDCL	4,348	4,715	4,904	
	SPDCL	6,694	7,238	7,528	
	Total	11,042	11,953	12,432	
3.1	<p>Filings of NPDCL as well as SPDCL shows that power consumption in the agriculture sector in Telangana is increasing irrespective of the situation on the ground. The above consumption figures are arrived at by the DISCOMs on the basis of their claim that they are supplying power for 7 hours per day (p.64, SPDCL). This is far from truth. Most of the time, farmers are not receiving not even four hours of supply in a day. As such the Commission shall not take the above consumption figures in to account..</p>				
3.2	<p>The fact that the agriculture consumption figures provided by the DISCOMs are anomalous comes out from their filings. According to their filings while 9,78,028 pump sets under SPDCL will be consuming 7,528 MU during 2015-16, under NPDCL 10,73,870 pump sets will be consuming 4,904 MU. In other words per pump set consumption will be 7,528 units under SPDCL, it will be 4,567 units in the case of NPDCL. Per pump set consumption in SPDCL will be nearly 70% higher compared to NPDCL, even while hours of supply of electricity are the same under both DISCOMs.</p>				
3.3	<p>Subsidy towards free power to agricultural services is being provided on the basis of 7 hours of power supply to these services. But in reality farmers are getting power for less than five hours. This implies that DISCOMs were compensated more than necessary to supply free power to agriculture. The excess subsidy paid to</p>				

	DISCOMs in this regard shall be recovered	
3.4	<p>In the absence of metering of agricultural connections DISCOMs claimed that they have arrived at these figures following the ISI methodology suggested by the Commission. But data collected under this methodology is also not complete. To overcome this we suggest that all DTRs serving the agriculture services should be metered so that the consumption estimates are realistic. The Task Force on electricity Sector appointed by the Government of Telangana State also suggested metering of DTRs serving agriculture loads.</p>	<p>Indian Statistical Institute (ISI) presented a new methodology for assessing agricultural consumption. The methodology picked up (2245 Nos.) samples from the population of Agl. DTRs for TSSPDCL (for six circles i.e. Mahabubnagar, Nalgonda, Medak, RR East, RR North & RR South). The sample is dynamic. (i.e.) over a period of six months, locations for 10% of the sample DTRs in each circle are to be changed, for effective implementation. As directed by the Regulatory Commission, meters were installed for 10% of sample size (i.e. 225 Nos.) in addition, so as to increase the number of valid DTRs to be considered for assessment of consumption. Since the metering is done on the LV side of the agricultural DTRs, the assessed consumption as per the procedure includes the consumption of unauthorized agricultural services also. The assessment of agricultural consumption as per the ISI methodology is done every month and is filed with the Hon'ble TSERC.</p> <p>It is difficult to meter all the DTRs serving to agricultural connections. The agricultural DTR meters are exposed to atmosphere hence more chances to damage of meters. This results in is loss of revenue and not practical.</p> <p>However the methodology now being followed is scientific and approved by Hon'ble TSERC.</p>
3.5	<p>Supplying electricity to agriculture during night time is leading to inefficient use of electricity as well as water. As farmers are not sure about timings of electricity supply in the night they mostly keep the electric pump sets on automatic starters. As and when electricity comes electric pump set starts pumping out water and due to lack</p>	<p>CPDCL is providing 7 hrs 3 phase power supply to Agl. Sector i.e. 4 hrs during day time & 3 hrs during night time duly complying government policy. Any Load relief given to the agricultural feeders on account of grid constraints and breakdowns, the same is being compensated</p>

	of visibility as well as in the absence of farmers in the field at this time the same field will be watered again and again leading to inefficient use of water and electricity. To avoid this we request the Commission to direct the DISCOMs to supply electricity to agriculture during day time only.	ensuring 7 hrs supply.																		
	<p>Deaths due to shocks</p> <table border="1"> <thead> <tr> <th></th> <th>2013-14</th> <th>First half of 2014-15</th> </tr> </thead> <tbody> <tr> <td>NPDCL</td> <td>185</td> <td>87</td> </tr> <tr> <td>Mahabubnagar</td> <td>115</td> <td>69</td> </tr> <tr> <td>Nalgonda</td> <td>84</td> <td>25</td> </tr> <tr> <td>SPDCL</td> <td>251</td> <td>129</td> </tr> <tr> <td>Total Telangana</td> <td>436</td> <td>216</td> </tr> </tbody> </table>		2013-14	First half of 2014-15	NPDCL	185	87	Mahabubnagar	115	69	Nalgonda	84	25	SPDCL	251	129	Total Telangana	436	216	<p>Every effort is being made to avoid accidents, by taking up regular maintenance works like replacement of conductor, providing of inter poles , maintains of DTRs structure and LT lines, providing of earthing. Wide publicity being given requesting Ryots not to meddle with Distribution Transformers.</p> <p>However all require measures are taken avoid accidents.</p> <p>The process of payment of the compensation will be examined for simplification as suggested. Balance cases pending for want of various documents such as FIR, postmortem, legal heir etc. The compensation is now enhanced to Rs two lakhs.</p>
	2013-14	First half of 2014-15																		
NPDCL	185	87																		
Mahabubnagar	115	69																		
Nalgonda	84	25																		
SPDCL	251	129																		
Total Telangana	436	216																		
4.3	The DISCOMs did not provide complete details of these incidents like for how many cases DISCOMs took responsibility and in how many cases compensation was paid and amount paid towards compensation. NPDCL mentioned that compensation was paid in 56 cases out of 185 deaths in 2013-14 and in 11 cases out of 87 deaths during the first half of 2014-15. Procedures need to be simplified to see that all victims receive compensation at the earliest.	In 2013-14 out of 331 accidents compensation Paid for 29 cases In 2014-15 out of 259 accidents compensation Paid for 12 cases The process of payment of the compensation will be examined for simplification as suggested. Balance cases pending for want of various documents such as FIR, postmortem, legal heir etc.																		
4.4	Even in the electrocution deaths that the DISCOMs had taken responsibility the amount paid (about Rs. 1 lakh per person) is very meagre. Even this meagre amount was not paid properly. There is	Presently Rs.2 Lacks compensation is being paid to non-departmental fatal accident.																		

	need to revise the compensation upwards like in the case of railways.	
4.5	There shall also be separate mechanism to pin responsibility for deaths due to electricity shocks. In the present case perpetrator itself is the judge. To avoid this anomaly a committee comprising different stakeholders shall go into these deaths and pronounce whether DISCOMs are responsible for these tragedies or not	Within 24 hours preliminary report and then detailed report is being furnished by ADE. As per Government of Telangana instructions the Chief Electrical Inspector to Government is being reported about the electrical accident. Then jurisdictional Deputy Electrical Inspector will investigate the electrical accident.
4.6	More than this these deaths are highly avoidable. These deaths are taking place due to neglect of rural network by the DISCOMs. Every year the Commission allowed Rs. 5 crore to be spent by the DISCOMs on safety measures to avoid such deaths. But DISCOMs did not care to utilise them. NPDCL spent Rs. 34.25 lakh during 2013-14 and Rs. 12.29 crore during first half of 2014-15. If the safety of DTRs were improved many of these deaths could have been avoided.	During the financial year 2013-14 Rs. 35 crores expenditure incurred towards Renovation & Modernisation Works and Reliability Improvement and Contingency Works for network strengthening. Out of that expenditure in rural is Rs. 17.23 crores and urban Rs. 17.77 crores.
4.7	In most of these cases it was the farmers who met this tragic end. These deaths could have been avoided if there were timely and sufficient technical support at the ground level and good quality electrical network. Most of the technical posts like linemen in rural areas are vacant and farmers are forced to attend to repair work on their own with fatal consequences. Thousands of line men posts are lying vacant since a long time. Recently Telangana State Government announced that hundreds of electrical engineers will be recruited shortly. But there is no word about recruiting line men. Filling line men posts not only bring	All efforts are being made to maintain good quality electrical network. As per field requirement depending on the work load, the required field staff is deployed. In lieu of vacancies temporary arrangement made with outsourcing staff.

	down deaths due to shocks but also help to bring down T&D losses and their by add to the income of the DISCOMs.	
5.1	<p>Quality of Power</p> <p>Electricity received by the farmers was of uneven quality with unpredictable interruptions. Power supply timings announced by the Licensees are not being adhered to. It is the responsibility of the Commission under Section 86 (1) (i) of the Electricity Act, 2003 to enforce standards with respect to quality, continuity and reliability of service by licensees.</p>	The supply to Agriculture sector provided into two spells every day. All the efforts are made to provide supply in a fixed and stipulated timing without deviation. In case of emergencies, if any emergency load reliefs are implemented in the schedule time of supply and the same is being compensated on the same day.
	DTR failure/repair	
5.2	<p>DISCOMs are also not attending to maintenance of DTRs properly. Farmers are being forced to incur expenditure in transporting the DTRs. DTRs are also not being repaired in time. DISCOM staff are also collecting money from farmers to repair DTRs. They are not attending to repairs until the farmers pay up. In Kanugutta village of Both mandal in Adilabad district it took 10 days to repair the DTR. In Madaka village of Odelu mandal in Karimnagar district it took more than one week to repair the transformer while under Standards of Performance DTRs in rural areas shall be repaired within 48 hours.</p>	Instructions were issued to all the Superintending Engineers/ Operation for restoring power supply in case of all the failed Distribution Transformers (DTRs) [irrespective whether they are sick or failed or burnt or stolen; agricultural DTRs or non-agricultural DTRs] by replacement within 48 hours of receiving the complaint in Rural areas. TSSPDCL is maintaining sufficient quantity of healthy rolling stock of DTRs at all its SPM centers to facilitate timely replacement of the failed DTRs.
5.3	<p>Low quality of power in rural areas is also because of crumbling transmission and</p> <p>distribution network in rural areas. Decades old conductors are hanging low endangering lives as well as resulting high transmission losses. Many of the DTRs are more than decade old</p>	During the financial year 2013-14 Rs. 35 crores expenditure incurred towards Renovation & Modernisation Works and Reliability Improvement and Contingency Works for network strengthening. Out of that expenditure in rural is Rs. 17.23 crores and urban Rs. 17.77 crores.

	and should have been replaced. Added to this many of these DTRs do not have even AB switches. Depreciated and old parts of T&D network shall be replaced in keeping with prudent maintenance of the network in good health.	
5.4	<p>Issuing new connections</p> <p>It has become an uphill task for farmers to obtain new electricity connections. Even after paying the required amount through DD farmers are made to run from pillar to post. There is rampant corruption in issuing new connections. Officials do not follow any method in allotting new connections. There is complete lack of transparency in issuing new connections.</p> <p>We request the Commission to lay down transparent norms for release of new agriculture connections including the costs to be borne by farmers towards poles and conductors/service wire.</p>	Customer Service centers have been set up at subdivision level so as to provide the best possible service to the consumers. These centers enable the customers to register for new services, complaints, etc at a common centre and get their service done within the stipulated time. Seniority of applications received for agricultural services are being maintained at Mandal Level and released accordingly duly observing the SC/ST quota.
	Billing issues	
6.1	<p>Agriculture bills combined with domestic bills</p> <p>The DISCOMs continue the process of issuing single bill for domestic as well as agriculture services in the rural areas. When there were delays in paying the bill for agriculture service domestic connection is being disconnected. This is highly objectionable and goes against the rules. We request the Commission to direct the DISCOMs to issue separate bills for domestic and agricultural services.</p>	Separate bills are being issued to agricultural consumers and domestic consumers,
6.2	DISCOMs are also not notifying the farmers to which sub-category	Steps will be taken to include the Sub category in the bills issued to

they belong to. A large number of farmers were receiving notices asking them to pay huge amounts as they belong to a paying sub-category. For example, Nalgonda circle of SPDCL mentioned 3,067 services as falling under wet land farmers holding more than 2.5 acres for the year 2012-13. In the previous year it mentioned only 86 services under this sub-category.

the consumer's from 01.04.2015. Agricultural consumer as on 28.02.2015 is as follows. As per this category the consumer is being billed and issued bills for payments.

No of Services

5A With DSM measures	11	Dry Land Farmers (Connections <3 Nos.)	875381
	12	Wet Land Farmers (Holding <2.5 Acres)	20140
	13	Dry Land Farmers (Connections>3 Nos.)	2002
	14	Wet Land Farmers (Holding>2.5 Acres)	1240
	15	Corporate Farmers & IT Assesses	3145
	16	Rural Horticulture Nurseries	66
5B Without DSM measures	21	Dry Land Farmers (Connections <3 Nos.)	249
	22	Wet Land Farmers (Holding <2.5 Acres)	32
	23	Dry Land Farmers	1438

			(Connections>3 Nos.)	
		24	Wet Land Farmers (Holding>2.5 Acres)	2383
		25	Corporate Farmers & IT Assesses	1562
		TOTAL		90763 8
	Wells in the ayacuts of irrigation projects			
6.3	Pump sets located in the ayacuts of irrigation projects are being categorised as paying connections. Most of these pump sets have come up in the tail ends of irrigation projects. Farmers in these locations have resorted to well irrigation because of lack of water supply from canals. These farmers shall be treated like other farmers.	Your request will be examined		
6.4	One of the stipulations is that farmers with more than 2.50 acres of land under major and medium irrigation schemes will not be eligible for free power. Here it is to be noted that farmers at the tail end of these projects and under projects like Sreeramsagar whose irrigation potential has drastically come down, though these lands are localized under these irrigation schemes never or rarely get water from the canals. Because of this, they are forced to go in for			

	well irrigation. Though they are treated as irrigated farmers in the government records (irrigation as well as revenue) they do not get benefits of this irrigation. Taking this fact into account we request that the farmers irrespective of their holding size under the irrigation schemes shall be treated as eligible for free power.	
	Income tax assessee	
6.5.1	Under the existing electricity tariff policy while most of the farmers are exempt from paying electricity charges farmers coming under corporate farmers and income tax assesses need to pay electricity charges as decided by the Electricity Regulatory Commission. While there is no doubt or dispute in collecting electricity charges from corporate farmers the issue related to income tax assesses needs re-examination.	As per T O 2013-14 IT assesses are not considered for free AGL power supply
6.5.2	There is no clear meaning or interpretation of which of the farmers are to be considered as income tax assesses. Out of nearly 20 lakh pump set farmers in Telangana only about 4,000 farmers are categorized as corporate farmers and income tax assesseees. While this number of farmers appears small the number of farmers who are bothered by this category are too many.	As per T O 2013-14 IT assesses are not considered for free AGL power supply
6.5.3	As there is no clarity on meaning of this slab many times farmers are served notices under this category or threatened that they would come under this category. As a result farmers were made run around many offices particularly MRO and electricity department. Farmers have to submit certificates from MRO saying that they do not fall under this income category. While on the one hand it is adding to the harassment that gullible farmers are made to suffer	Farmers coming under the category have to produce necessary documents to convert from paying category to free category as per procedure

	from different corners on the other it is mounting additional burden on the Mandal Revenue Office (MRO) which are already tasked with many duties. In the end it is also not adding any additional income to the DISCOMs.	
6.5.4	While this measure is not contributing any additional income to the utilities it is leading to harassment of ordinary farmers. In this background we request deletion of the slab related to income tax assesseees under agriculture category.	
6.6	Bill Clarity The Electricity Bills being issued by the DISCOMs are not clear and it is difficult to make out details of the Bill. We request the Commission to direct the DISCOMs to issue clear bills and the Bills shall be in local language along with English.	The Bills are being prepared as per the Commission Regulations
	DSM Measures	
7.1	To be eligible for free power, farmers have to undertake demand side management (DSM) measures i.e., installation of capacitors, ISI marked pump sets, HDPE or RPVC piping and frictionless foot-valve. These measures are proposed to bring down quantum electricity consumption in the agriculture sector there by reducing financial burden both on the state government and farmers. Farmers also would like to contribute to this endeavour. Though farmers are interested in taking them up they are facing hurdles in implementing them.	As per the Hon'ble APERC Tariff Orders the Agricultural Service with DSM measures only are eligible for free power. Accordingly, the services to the Agricultural Pump Sets are being released with DSM Measures which includes capacitors of adequate rating. Out of 8,93,397 Agricultural pump sets 7,22,797 are provided with the capacitors and wide publicity was given for implementation of DSM measures and educating the consumers at field
7.2	DISCOM officials are claiming that more than 90% of the farmers	As per the Hon'ble APERC Tariff Orders the Agricultural Service

	<p>have installed capacitors. But truth is that not even 10% of the farmers installed capacitors. Farmers do not have technical assistance in the form of access to linemen or assistant linemen, to take this up. thousands of line men posts in rural areas are lying vacant. Even where linemen or assistant linemen are available they do not have proper knowledge in installation of capacitors. Installation of capacitors at a wrong point led to burning of pump sets, which scared other farmers from doing the same.</p>	<p>with DSM measures only are eligible for free power. Accordingly, the services to the Agricultural Pump Sets are being released with DSM Measures which includes capacitors of adequate rating. Many no of farmers have already installed capacitors at their pump sets .Further wide publicity was given for implementation of DSM measures and educating the consumers at field</p> <p>836 Numbers of 2MVAR Capacitor Banks at 33/11Kv sub station are installed and inservice. Further 216 Nos Capacitor banks will be commissioned within a year</p>
7.3	<p>A pilot implemented by SPDCL (p.88) power consumption declined by nearly 10% after installation of capacitors. This implies that by spending Rs. 60 crore to install capacitors at 20 lakh pump sets in Telangana DISCOMs will be able to save about Rs. 500 crore. This alone shall spur the DISCOMs to implement capacitor programme on war footing.</p>	
7.4	<p>Use of ISI standard pump set is another important DSM measure. Present pump set efficiency in the State is only 25% and this could be increased to 50% by using ISI standard motors. For proper operation of ISI standard pump sets minimum voltages are required. Under prevailing low voltages in the state these ISI motors do not work. Because of this low voltage, farmers are forced to go in for locally made pump sets which operate even under low voltages. One of the reasons for low voltage is overloading of distribution transformers (DTR) installed for agricultural purposes. This overload is to the extent of 25 to 50%. If this overload problem is addressed successfully farmers can think of using ISI standard motors. This can be addressed by increasing the number of DTRs of adequate capacity in the agriculture sector. We request the state</p>	<p>Agricultural consumption is arrived based on effective implementation of ISI suggested new Methodology in TSSPDCL. Distribution losses are arrived based on recorded metered sales of both LT and HT services as per Energy Billing System, HT services data base and assessed Agl. consumption as per ISI suggested new Methodology. There is no matter that a part of transmission and distribution losses is being included in agricultural consumption. The Year wise agricultural consumption of TSSPDCL from FY 2012-13 to FY 2014-15(upto Jan'15) are shown below :</p>

government and DISCOMs to install additional DTRs to solve low voltage problem so that farmers will be emboldened to go in for ISI standard motors.

Sl. No.	Year		Input in MU	Metered Sales in MU	% of metered sales w.r.t input	Agl Consumption in MU	% of Agl Consumption w.r.t input	Difference in Agl. consumption w.r.t. previous year in MU
1	2012-13	Actuals	28736.62	18652.14	64.91	6229.27	21.68	
2	2013-14	Actuals	29644.47	19384.28	65.39	6553.95	22.11	324.68
3	2014-15	Actuals (upto Jan'15)	26642.78	18054.84	67.77	5666.47	21.27	
4	2014-15	Projected Agl. in ARR filing	-	-	-	7238.26	-	684.31

		<p>It seen from the above that the % Agl. sales are at a range of 21-22% approximately in FY 2012-13 to FY 2014-15 (upto Jan'15) and difference in Agl. consumption in FY 2013-14 w.r.t. previous year FY 2012-13 and in FY 2014-15 (projected) w.r.t. to FY 2013-14 (actuals) is 324.68 MU and 684.31 MU only respectively.</p> <p>However the methodology now being followed is scientific ISI methodology and approved by Hon'ble TSERC and agricultural consumption is arrived keeping an eye on the number of agricultural services released year by year and maintaining same percentage range of agricultural consumption w.r.t. input</p>
7.5	<p>Though the farmers may be willing to install ISI standard motors in the event of voltages improving the financial burden on them will be onerous and it will be good to explore the ways of minimizing burden on them in replacing the non-standard motors with ISI standards motors. In Tamil Nadu, the State government and utilities are said to have taken up a programme where a third party – Electricity Service Company (ESC) – takes the responsibility of replacing the motors and is given a share in the savings of electricity consequent to installation of standard motors. We request the State government to explore this option also as it will not burden the state government as well as the farmers.</p>	<p>The issue will be taken to the notice of the Government to make a decision for replacing the ISI standard motors</p>

	HVDS:	
8.1	<p>Since 2005 HVDS programme is taken up in the state as a solution to the low voltage problem. Until now thousands of crores of rupees were spent on this but not even 10% of the pump sets were covered. A HVDS transformer is five times costlier than the regular DTRs being used at present. It was felt that if the same amount was spent on adding regular DTRs by this time the low voltage problem would have been solved. Even if the present additional load on existing DTRs is assumed as 50% then the estimated expenditure would be 50% of the cost of the existing DTRs. If we want to replace all the DTRs with HVDS DTRs the expenditure would be five times. The question is why spend 550% more when we could achieve with 50% only. We may be wrong in these calculations. Farming community in the state does not have any information on or insight in to this HVDS programme. Farming community in the state should have been taken in to confidence while formulating solution to low voltage in rural areas. This is not too late. We request the state government as well as the DISCOMs to place all the information related to HVDS before the public including farmers for an informed discussion on the problems being faced by both the DISCOMs and farmers in the state that will lead to a solution that is beneficial to all stakeholders.</p>	<p>All the small capacity DTRs being erected hold 5 yrs guarantee period with 25 yrs life and is well within the payback period on par with all other T&D schemes</p>
8.2	<p>Over the last few years hundreds of crores were spent on implementing HVDS for agriculture pump-sets. The present filings also show that DISCOMs plan to spend more money on this. Before taking this programme forward there should have been a thorough review of its implementation until now. But there appears to be no</p>	<p>The main benefits of HVDS are to reduce theft, improve voltage profile, reduction in LT line losses, arresting of DTR failures and regularization of un-authorized services.</p>

	such exercise. Given the serious implications of this investment (Consumers have to bear this burden in the form of higher cost of service) we place below our analysis of the investment under HVDS.																									
8.3	<p>For the following analysis we have compared LT – DTR and HVDS. We have taken the transformer capacity as 63 kVA. Hours of supply in a day is assumed as 7 hours and number of days as 240 days. Cost of power is assumed as Rs. 3.00 per unit. We examined this under three power factor capacities – 0.6, 0.7 and 0.8 The results of our analysis are presented in the following table. In this table reduction in line losses are taken as returns on investing on HVDS.</p> <table border="1" data-bbox="306 678 1322 1338"> <thead> <tr> <th>Power Factor</th> <th>Cost of HVDS (Rs.)</th> <th>Cost of Lt – DTR (Rs.)</th> <th>Additional Cost (Rs.)</th> <th>Returns per year from HVDS (Rs.)</th> <th>Payback period (Years)</th> </tr> </thead> <tbody> <tr> <td>0.6</td> <td>6,29,628</td> <td>1,15,000</td> <td>5,14,628</td> <td>18,949</td> <td>27.16</td> </tr> <tr> <td>0.7</td> <td>6,29,628</td> <td>1,15,000</td> <td>5,14,628</td> <td>13,923</td> <td>36.96</td> </tr> <tr> <td>0.8</td> <td>6,29,628</td> <td>1,15,000</td> <td>5,14,628</td> <td>10,660</td> <td>48.28</td> </tr> </tbody> </table>	Power Factor	Cost of HVDS (Rs.)	Cost of Lt – DTR (Rs.)	Additional Cost (Rs.)	Returns per year from HVDS (Rs.)	Payback period (Years)	0.6	6,29,628	1,15,000	5,14,628	18,949	27.16	0.7	6,29,628	1,15,000	5,14,628	13,923	36.96	0.8	6,29,628	1,15,000	5,14,628	10,660	48.28	As such analysis of HVDS based on PF is irrelevant
Power Factor	Cost of HVDS (Rs.)	Cost of Lt – DTR (Rs.)	Additional Cost (Rs.)	Returns per year from HVDS (Rs.)	Payback period (Years)																					
0.6	6,29,628	1,15,000	5,14,628	18,949	27.16																					
0.7	6,29,628	1,15,000	5,14,628	13,923	36.96																					
0.8	6,29,628	1,15,000	5,14,628	10,660	48.28																					

	<p>In Andhra Pradesh a power factors of 0.70/0.80 reflect the prevailing situation. Under these conditions it takes 37 to 48 years to recover the investment made in to the HVDS system, let alone profits over it. In other words the payback period for these investments is about 37 to 48 years. The guaranteed life of these transformers is about 3 years and its life may extend 10 years, but its' payback period is several times more. Thus, financially speaking the HVDS does not appear to be attractive. Still the DISCOMs in the state are rushing in to implement it on large scale. And farmers are being coerced in to accepting it.</p> <p>One of the important reasons shown in promoting the HVDS system was elimination of unauthorised agriculture connections and theft. Experience in other states like Rajasthan and Uttar Pradesh shows that HVDS is not a deterrent to these practices and even under HVDS system theft continues to take place. We hear that Noida Power Company Limited (NDPL) in UP which went in to HVDS on a large scale is now thinking about winding it up.</p>	<p>All the small capacity DTRs being erected hold 5 yrs guarantee period with 25 yrs life and is well within the payback period on par with all other T&D schemes</p> <p>The main objective of using small capacity DTRs is limit the consumers to 3-4 farmers duly regularizing the un authorized services as such there is no scope for the theft.</p>
8.4	<p>Though the returns from this HVDS scheme are doubtful it will surely end up as a huge burden on the consumers in the form of Cost of Service (COS) as these transformers are four times more costly than the present transformers.</p>	<p>The small capacity DTRs are being erected for release of new agl services in TSSPDCL. In HVDS scheme also, the existing 63/100 KVA are replaced with small capacity transformers. There is no cost difference in small capacity transformers being used in the above two scheme as there is no difference in the specifications. Hence there is no additional expenditure incurred on account of DTR cost.</p>

8.5	Based on these facts we request the Commission to review the past implementation of the HVDS in the state and also to put the presently proposed scheme with the support of JIBC to strictest test. We also request the Commission to direct the DISCOMs to provide us information on amount spent on HVDS and number of pump sets converted to HVDS each year since the programme was taken up.	<table border="1"> <thead> <tr> <th>Year wise</th> <th>06-07</th> <th>07-08</th> <th>08-09</th> <th>09-10</th> <th>10-11</th> <th>11-12</th> <th>12-13</th> <th>13-14</th> <th>14-15</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Pumps sets</td> <td>13547</td> <td>29501</td> <td>23014</td> <td>16717</td> <td>25170</td> <td>5203</td> <td>0</td> <td>0</td> <td>11414</td> <td>124566</td> </tr> <tr> <td>Amount</td> <td>34.72</td> <td>43.08</td> <td>38.00</td> <td>29.00</td> <td>150.22</td> <td>40.49</td> <td>0</td> <td>0</td> <td>55.48</td> <td>390.99</td> </tr> </tbody> </table>	Year wise	06-07	07-08	08-09	09-10	10-11	11-12	12-13	13-14	14-15	Total	Pumps sets	13547	29501	23014	16717	25170	5203	0	0	11414	124566	Amount	34.72	43.08	38.00	29.00	150.22	40.49	0	0	55.48	390.99
Year wise	06-07	07-08	08-09	09-10	10-11	11-12	12-13	13-14	14-15	Total																									
Pumps sets	13547	29501	23014	16717	25170	5203	0	0	11414	124566																									
Amount	34.72	43.08	38.00	29.00	150.22	40.49	0	0	55.48	390.99																									
9.1	<p>Solar based power for agriculture:</p> <p>Government of India and Telangana have taken steps to pilot solar based agriculture pumps. While this is welcome, it will be good to pilot a few projects where the agriculture feeder is powered by solar. With falling prices of solar, this option may be economically viable and with MNRE subsidy and soft loans become very attractive.</p>	Noted																																	
10.1	<p>A dedicated power plant for Twin Cities</p> <p>Farmers of Nalgonda and Medak are suffering a lot as often power meant for them is diverted to meet the needs of Twin Cities of Hyderabad and Secunderabad. An alternative could be to set up a power plant dedicated to the needs of Twin Cities. Already land was acquired at Sankarpally to set up a power plant. Telangana State Government shall take all steps needed to set up a gas based power plant at Sankarpally at the earliest.</p>	<p>Following capacity additions (thermal) are been planned</p> <ul style="list-style-type: none"> - KTHP Stage II – 600 MW - KTHP Stage VII – 800 MW - Manuguru 1080 MW - Damarcherla A 1200 MW - Damarcherla B 3200 MW - KTHP Stage VII – 800 MW <p>In addition 250 MW from Hydel sources are planned. Issue of low PLFs due to coal shortage is been taken up with Coal India at all forums for resolution.</p> <p>Further an MoU is entered with govt of Chattisgarh for supply of 1000MW</p>																																	

11.1	<p>Transmission lines in agricultural fields: No Policy and No compensation</p> <p>Farmers are not being paid for the land taken to lay power lines as the DISCOMs are applying out dated Telegraph Act. Land acquisition Act 2013 has to be applied in this case.</p> <p>While some movement in this direction has taken place in SPDCL it has to be seen that this applies to whole of Telangana and the Commission shall direct DISCOMs to formulate rules and procedures in this regard.</p>	Noted
11.2	<p>Farmers are concerned that electricity transmission lines and towers are being laid in their agricultural lands, without any prior information or consent. After thorough deliberations, Telangana Kisan-Kheth Mazdoor Congress has proposed a policy, which should serve as an instrument for compensating the farmers, who are affected by the transmission line mentioned above, and all such activities in future and past.</p>	Not in the purview of Discoms
11.3	<p>Usually, farmers do not receive any prior information, nor anyone would ask their consent, before entering their fields. Farmers feel laying a transmission line and possibly towers in their lands, would deprive of them of their livelihood, loss of crop and possible health problems. Often, access to their land is restricted. The loss of economic value for their land would also undermine their financial capacity in various ways. Small and marginal farmers with less than 5 acres would be more severely affected.</p>	Not in the purview of Discoms

11.4	<p>In Rangareddy district, a Committee was constituted by the District Collector to formulate a compensation package. Eventually, on 8th August, 2014, this Committee had worked out a compensation package for the farmers, as follows:</p> <p>“A: FOR TOWER LOCATION AREA :</p>	Not in the purview of Discoms
	<p>B: FOR LINE CORRIDOR AREA :</p>	
11.5	<p>The farmers’ lands even underneath the transmission line conductors between tower to tower, are affected, where he can’t further construct any structures and even they can’t grow any tall trees.</p>	Noted
11.6	<p>Hence to cover all the damages to the land owner under the line corridor for a width of 20 meters (10 meters on either side from the centre of the line) for the existing span between tower to tower shall be assessed at Rs.60 per Sq. Meter and paid to the respective land owners as per the extent of land affected.</p>	
11.7	<p>If any fruit bearing tree other than crops are required to be cut under the transmission line, conductors, the compensation shall be paid extra based on the assessment by the Horticulture department.”</p>	
11.8	<p>While the compensation worked out by the District Committee (mentioned above) is lower than prevailing land market conditions, and much lesser than the farmers expectations, the compensation package worked out by this Committee set up by Rangareddy District Collector can be a beginning. However, the parameters,</p>	

	<p>procedures and quantum of compensation have to be formulated and incorporated in a relevant policy. It would also prevent individual-centric responses by local officials.</p>	
11.9	<p>We would request you to take the following steps:</p> <p>Enable the adoption of Telangana Resettlement, Relief, Rehabilitation and Compensation Policy. Such a policy can establish a framework, whose implementation can be reviewed and improved as appropriate.</p> <p>2. Provide for adequate compensation to affected farmers, and initiate steps to rehabilitate the affected families in case of complete dispossession, especially in Yacharam, Kandukur, Manchala and other mandals.</p> <p>3. Formulate a plan for paying compensation to the farmers, after their consent, for all kinds of loss, including opportunity costs.</p> <p>4. Farmers, who are in possession of assigned pattas and other land entitlements should also be given compensation on par. Their rights have been established by various Court Judgements and government orders.</p> <p>5. Provide specific instructions on compensation package to relevant officials, not leaving them to any individual interpretations, such as HMDA limits. Rangareddy District Committee has worked out the package in general, and is not limited to HMDA or any such geographical areas.</p> <p>6. Enable release of information on the entire project in the public</p>	Noted

	domain, including line alignment, location of towers, possible electro-magnetic impact on human beings and animals, in the vicinity, and the compensation schemes	
--	---	--

S.No	Summary of Objections / Suggestions	Response of the Licensee
	30. K.Rangaiah, A.P.State Secretary, All Inida Kisan Mazdoor Sabha (AIKMS), 658, Marx Bhavan, 7th lane, Vidyanagar, Hyderabad 500 044.	
2.1	విద్యుత్ చార్జీలు అమలులోకి వచ్చే కంటే 120 రోజుల ముందుగా కొత్త టారిఫ్స్ ప్రకటన ప్రక్రియ ప్రారంభం కావాలి. కానీ 48 రోజుల ముందు మాత్రమే కొత్త టారిఫ్స్ లపై ప్రతిపాదన ప్రకటించారు. వ్యవధి తక్కువ వున్నందున అభ్యంతరాలు తెలపడానికి ప్రజా విచారణ సంధర్భంలో కూడా అవకాశం ఇవ్వగలరు. నోటిఫికేషన్ తరువాత కనీసం 30 రోజులుండాలి. ఏ.అర్.అర్. తరిఫ్స్ వివరాలు ఒకేసారి ప్రకటించలేదు. వివరంగా, విస్తృతంగా వినియోగదారులు ప్రజా విచారణలో పాల్గొనే అవకాశం ఇవ్వగలరని మనవి.	గౌరవ కమీషన్ ముందు లైసెన్సీ 2015-16 సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు ప్రతిపాదిత ధరలను 07.02.2015 రోజున సమర్పించడమైనది. దీనికి సంబంధించి ARR & FPT ల పై 11.02.2015 రోజున గౌరవ కమీషన్ ఆదేశానుసారం బహిరంగ ప్రకటన జారి చేయబడినది.
3.1	<u>విద్యుత్ అవసరాలు - అంచనాలు</u> : రాష్ట్ర విభజనకారణంగా విద్యుత్ ఉత్పత్తి వాటాల విషయంలో స్పష్టత లేదు. ఎవరికీ ఎంతా వాటా తేలకుండా లభ్యతపై అంచనాకు ఎలా వస్తారు. దీనిని కమీషన్ నిర్ధారించాలి.	ఆ.ప్ర పునర్విభజన చట్టమును అనుసరించి రెండు రాష్ట్రాలలో విద్యుత్ ఉత్పత్తి కేంద్రాలలో వాటాను పరిగణించి విద్యుత్ లభ్యత పై అంచనా సమర్పించడమైనది
3.2	వచ్చే సంవత్సరానికి అవసరం అయిన విద్యుత్ అంచనా వాస్తవాలపై ఆధారపడి లెక్కించాలి. విద్యుత్ పొదుపు, సోలార్ విద్యుత్ వినియోగం అంశాలు పరిగణలోకి తీసుకుంటే నేడు వేసిన అంచనాలు ఎక్కువగా వున్నాయి.	2015-16 సంవత్సరానికి విద్యుత్ అమ్మకాలను 2009-10 సంవత్సరము నుండి 2014-15 మొదటి అర్థ సంవత్సరము వరకు ఉన్న వాస్తవ విద్యుత్ అమ్మకాల ఆధారంగా అంచనా వేయడమైనది.
3.3	వ్యవసాయ వినియోగంలో అనేక ప్రమాణాలు తీసుకోవడం ద్వారా విద్యుత్ పొదుపుకి అవకాశం వుంది అనేది వాస్తవం. డిటిఅర్, కెపాసిటర్లు వినియోగం ద్వారా విద్యుత్ పొదుపు పెరుగుతుంది. అలాగే వాస్తవ వినియోగ లెక్కలు నిర్దిష్టంగా ఉండాలి. ఆ విధంగా లేవు.	గౌరవ కమీషన్ వారు ఆమోదించిన ISI విధానము ఆధారంగా లైసెన్సీ వ్యవసాయ రంగ విద్యుత్ వినియోగం అంచనా వేయబడుతుంది
3.4	పంపిణీ - సరఫరా నష్టాలు తగ్గాలి. కనీ విచిత్రం ఏమిటి అంటే పెరుగుతున్నట్లు లెక్కలు చూపారు. ఉత్తర డివిజన్.లో 2013-14లో 13.31 నుండి 15.56% కి పెంచారు.	గౌరవ కమీషన్ ముందు 2015-16 సంవత్సరం రిటైల్ సరఫరా వ్యాపారానికి సమర్పించిన సమగ్ర ఆదాయ ఆవశ్యకత మరియు ధరల ప్రతిపాదనలో పంపిణీ

	<p>దక్షిణ డివిజన్.లో 2013-14లో 13.20% నుండి 14.91 కి పెంచారు.</p> <p>సామర్థ్యం పెరుగుతున్నదా? తగ్గుతుందా? వాస్తవాలు పరిశీలించాలి. ఎక్కువ వ్యధా నుండి తక్కువ వ్యధాకి దారితీయాలిగాని ఎక్కువ వ్యధా జరగటానికి అనుమతి అడగటం విచిత్రంగా వుంది. వ్యధాని అరికట్టాలి. దీని మూలంగా ఖర్చు తగ్గుతుంది</p>	<p>నష్టాలను ఈ క్రింది విధంగా తెలియపర్చబడినవి.</p> <p>2013-14 సంవత్సరానికి వాస్తవ పంపిణీ నష్టాలు 13.20%</p> <p>2014-15 సంవత్సరానికి పరిగణించిన పంపిణీ నష్టాలు 13.41%</p> <p>2015-16 సంవత్సరానికి పరిగణించిన పంపిణీ నష్టాలు 12.58%</p> <p>2014-15 మరియు 2015-16 కు గాను కమీషన్ వారు 3 వ నియంత్రణ కాలం కు నిర్ణయించిన పంపిణీ నష్టాలు ను పరిగణించడమైనది</p> <p>విద్యుత్ పంపిణీ నష్టాలను తగ్గించుట అందుబాటులో ఉన్న చర్యలను తీసుకోవడమైనది. ఫలితంగా 2008-09 సంవత్సరం లో 16.94% గా ఉన్న పంపిణీ నష్టాలు 2013-14 సంవత్సరానికి 13.20%కు తగ్గించడం జరిగింది.</p>
4.1	<p><u>విద్యుత్ కొనుగోలు ఖరీదు</u></p> <p>వార్షిక ఆదాయ అవసరాలలో విద్యుత్ కొనుగోలుకే 77% ఖర్చు చేస్తున్నట్లు తెలిపారు. ఇది పరిశీలించాలి.</p>	<p>మీ సలహా పరిశీలించబడును</p>
4.2	<p>విద్యుత్ కొనుగోలు ఒప్పందాలు అన్ని ఉమ్మడి రాష్ట్రంలో చేసుకున్నవి అనే కారణంతో ఆం.ప్ర. ప్రభుత్వం రద్దుకు ప్రతిపాదించింది. రెండు రాష్ట్రాల మధ్య విద్యుత్ కేటాయింపులు, వాటి ధరలలో మార్పులు బహిరంగ విచారణ ద్వారానే జరగాలి.</p>	<p>AP Reorganisation Act, చట్టం ప్రకారం తెలంగాణా రాష్ట్రము యొక్క తగిన వాట పొందడానికి వివిధ స్థాయిలలో కార్యాలు చేపట్టడమైనది</p>
4.3	<p>వార్షిక అవసరం రెండు డిస్కాలకు రూ.26.473.77 కోట్లు పేర్కొని లోటు పూడ్చడానికి రూ.1088.61 కోట్ల కొత్త చార్జీలు వేస్తూ, ప్రభుత్వం నుండి రూ.6476.30 కోట్లు అవసరం ఉంటుందని పేర్కొన్నారు. దీనిలో పై ప్రమాణాలు పాటిస్తే అదనపు చార్జీలు వేయవలసిన అవసరం లేదు.</p>	<p>2013-14 సంవత్సరములో గౌరవ కమీషన్ జారి చేసిన ధరల ఉత్తర్వు ప్రకారము సగటు విద్యుత్ సరఫరా వ్యయం యూనిట్ ఒక్కంటికి రూ.5.25 గా ఉండగా 2015-16 సంవత్సరానికి అంచనా వేసిన ఆదాయ ఆవశ్యకతను అనుసరించి సగటు విద్యుత్ సరఫరా వ్యయం యూనిట్ ఒక్కంటికి రూ.5.90గా ఉంది. ఇది 2013-14 సంవత్సరములో పోల్చితే 13.46% పెరుగుదలను</p>

		నమోదవుతుంది.
4.4	<p><u>కొత్త విద్యుత్ స్థిర చర్చిలలో వ్యత్యాసాలు</u></p> <p>కెటిపిపి-కెటిపిఎస్-IV కి యూనిట్ కి రూ.1.79 పై. కెటిపిపి-II కి యూనిట్ కి రూ.2.75 పై యుఎంపిపి ముంద్రా 400 ఎండబ్ల్యులో యూనిట్ ధర 0.98 పై వుంది. వీటి నుండి విద్యుత్ కొనుగోలు ధర, కమీషన్ నిర్ణయం పై ఆధారపడి ఉంది. వీటిలో కొత్త పవర్ ప్లాంట్ లో ధరలు ముంద్రా కంటే 100% ఎక్కువ ఉన్నాయి. ఎందుకు నిర్మాణ ఖర్చుల్లో తేడాలు చూపారు. కాపిటల్ వ్యయం పెరగడానికి కారణం నిర్మాణ జాప్యం. పాలకుల నిర్లక్ష్యం కారణంగా పెరిగిన ఖర్చు భారం ప్రజల పై నేస్తున్నారు.</p>	<p>TSGenco అంచనాలు ప్రకారం FY2015-16కు గాను, KTPP-I, KTPS-VI యూనిట్కు స్థిర ఛార్జీలు Rs.1.79/kWh మరియు KTPP-II స్థిర ఛార్జీలు Rs.2.25 / kWh.</p> <p>ఇది గమనించాలి, 2009 నాటికి KTPS-VI దశ పూర్తి చేయబడింది అయితే KTPP-II నిర్మాణంలో ఉంది మరియు 2015-16సంవత్సరంలో COD పూర్తవుతుంది (KTPS-VI దశ 500 మెగావాట్ల తో పోలిస్తే KTPP-II 600 మెగావాట్లు).</p>
5.1	<p><u>అస్థిర ఖరీదు</u></p> <p>వివిధ విద్యుత్ ప్లాంటులకు వాడేది ఒకే ఇంధనం అయినా యూనిట్ ఖరీదులలో తేడాలున్నాయి. హిందుజాకి యూనిట్ కి 1.86 పై వుంటే ఎస్.టిపిసి సింహాద్రి 2.60 పై కొనే ఒప్పందం వుంది. ఈ రెండు వాడేది మహానది బొగ్గే. కానీ 40% తేడా వుంది. కెటిపిఎస్-VI కి అస్థిర ఖరీదు క్రింద యూనిట్ కి 2.73 పై ఇవ్వడం కారణం చెప్పుతూ, మహానది బొగ్గు కారణం చెప్పారు. ప్రక్కనేవున్న సింగరేణి బొగ్గు కేటాయిస్తే తగ్గుతుంది.</p>	<p>KTPS VI యొక్క వేరియబుల్ ఖర్చు ఎక్కువ ఎందుకంటే బొగ్గు లింకగేస్ మహానది బొగ్గు గనులు లిమిటెడ్ (MCL) నుండి మరియు సరుకు ఛార్జీలు (Rs1,900/MT) కుడా సింగరేణి కాలరీస్ నుండి పోలిస్తే (Rs.400/MT).సింగరేణి కాలరీస్ బదులుగా M / s MCL నుండి బొగ్గు ఇచ్చిపుచ్చుకోవడం కోసం భారతదేశం యొక్క గవర్నమెంట్ ఇప్పటికే నిర్ణయము తీసుకోవడం జరిగినది. కొన్ని లాంఛనాలు క్లియర్ చేయవలసి ఉంది.</p> <p>సింహాద్రి NTPS కోసం 40% బొగ్గు దిగుమతి చేయబడుతున్న కారణంగా, HNPCL వేరియబుల్ ఖర్చు సింహాద్రి NTPS వేరియబుల్ ఖర్చు తోపోలిస్తే ఎక్కువగా ఉంటుంది</p> <p>దేశీయ బొగ్గు కొరత దృష్ట్యా సింహాద్రి సూపర్ థర్మల్ పవర్ ప్లాంట్, దేశీయ బొగ్గు 60% మరియు దిగుమతి బొగ్గు 40% ఉపయోగిస్తోంది.</p>

		100% దేశీయ బొగ్గు ఆధారంగా HNPCL వారు వేరియబుల్ ఖర్చు అంచనా వేసారు. HNPCL నుంచి విద్యుత్ ప్రొడక్షన్ ఇంకా మొదలు కాలేదు.
5.2	<p>గ్యాస్ ధరలు పెరిగాయని గ్యాస్ ఫ్లాంటు ద్వారా కొనే విద్యుత్ కి అస్థిర చార్జీలు పెంచారు. ఇవి కూడా రూ.2.62 నుండి రూ.3.44/- గా నిర్ణయించారు. జివికె 2.62/- నిర్ణయిస్తే రిలయన్స్ విద్యుత్ యూనిట్ కి 3.44గా నిర్ణయించారు. గ్యాస్ మునదే. అయినా గ్యాస్ కేటాయింపు దీని ధర కేంద్రం నిర్ణయించడం ద్వారా దీని భారం రాష్ట్ర ప్రజలు బారాయించ వలసివస్తుంది. గ్యాస్ పవర్ ప్లాంట్ లు నిర్మాణం అయివున్న కాలంలో ఒప్పందం ప్రకారం గ్యాస్ ఇవ్వని కారణంగా విద్యుత్ ఉత్పత్తి కొరత ఏర్పడింది. అధిక ధరకు విద్యుత్ కొనే స్థితికి దారితీసి అదనపు భారం ప్రజల పై వేస్తున్నారు. రాష్ట్ర అవసరాలు తీరిన తరువాతనే గ్యాస్ బయట రాష్ట్రాలకు ఇవ్వాలి. నిర్మాణం అయిన గ్యాస్ ప్లాంట్ లకు కేంద్రం గ్యాస్ ఇచ్చే విధంగా డిస్కాంలు రంగంలో దిగాలి. కేంద్రం పై వత్తిడి తీసుకురావాలి.</p>	<p>గెయిల్ (గ్యాస్ అథారిటీ లిమిటెడ్) వారు గ్యాస్ ధరలు 5.05 US \$/MMBTU కు పెంచారు. తదనుగుణంగా విద్యుత్ ఉత్పత్తి యూనిట్ కు అయ్యే స్థిర మరియు అస్థిర చార్జీలు పెరిగినవి. పెట్రోలియం మరియు సహజ గ్యాస్ మంత్రిత్వ శాఖ, భారత గవర్నమెంట్ వారు ప్రాధాన్యత రంగాలకు గ్యాస్ కేటాయింపులు జరుపుతారు. అయినప్పటికీని, తెలంగాణ డిస్కాం వారు, తెలంగాణ గ్యాస్ ప్లాంట్ లకు అదనపు గ్యాస్ కేటాయింపులు చేయాలని పెట్రోలియం మరియు సహజ గ్యాస్ మంత్రిత్వ శాఖ, భారత గవర్నమెంట్ వారికి సిఫారసు చేయాలని కోరుతూ తెలంగాణ గవర్నమెంట్ వారిని కోరుతారు.</p>
6	<p><u>సరఫరా పంపిణీ నష్టాలు</u> రాష్ట్ర విభజన కారణంగా సెంట్రల్ డిస్కాం పరిధిలో వున్నా కర్నూల్, అనంతపురం జిల్లాలు ఆం.ప్ర లో దక్షిణ డివిజన్ విద్యుత్ పంపిణీ సంస్థకి మార్చారు. ఖమ్మంలోని 7 మండలాలు ఈపిడిసిఎల్ మార్చారు. ఈ మార్పుల కారణంగా గత మల్టిఇయర్ టారిఫ్స్ ప్రమాణాలు పునఃసమీక్ష చేయాలి. 24 గంటలు విద్యుత్ పంపిణీ కోసం కేంద్రం, రాష్ట్రం కోట్లు ఖర్చు చేసే విధానం ముందుకు వస్తుంది. నష్టాలు తగ్గే అవకాశం వుంది. ఆదాయ అంచనాలు, రాబడులకు ఎందుకు తేడా వుంటుందో వివరించాలి. విద్యుత్ తయారీకి వాడే బొగ్గు అధిక రేటులో కొనడం, అవసరం లేకున్నా ఖరీదైన విదేశీ బొగ్గు కొనడం</p>	<p>గౌరవ కమీషన్ ముందు 2015-16 సంవత్సరం రిటైల్ సరఫరా వ్యాపారానికి సమర్పించిన సమగ్ర ఆదాయ ఆవశ్యకత మరియు ధరల ప్రతిపాదనలో పంపిణీ నష్టాలను ఈ క్రింది విధంగా తెలియపర్చబడినవి.</p> <p>2013-14 సంవత్సరానికి వాస్తవ పంపిణీ నష్టాలు 13.20%</p> <p>2014-15 సంవత్సరానికి పరిగణించిన పంపిణీ నష్టాలు 13.41%</p> <p>2015-16 సంవత్సరానికి పరిగణించిన పంపిణీ నష్టాలు 12.58%</p> <p>2014-15 మరియు 2015-16 కు గాను కమీషన్ వారు 3 వ నియంత్రణ</p>

	<p>వల్ల ఈ భారం ప్రజల పై వేస్తున్నారు. బొగ్గు వినియోగంలో అనేక లోపాలున్నాయి. అనేక సందర్భాలలో ఎత్తిచూపాం. ఎక్కువ ఖరీదుకు విద్యుత్ కొనడం, నేడు టి&డి నష్టాన్ని తగ్గించడానికి బదులుగా పెంచి చూపారు.తగిన సిబ్బందిని నియమించక పంపిణీలో నియంత్రణ, రెవెన్యూ వసూళ్ళలో నిర్లక్ష్యంతో భారం పెరిగి ఈ భారాన్ని ప్రజల పై వేస్తున్నారు. మన గ్యాస్ మన బొగ్గు, మన శ్రమజీవులు, మన సాంకేతిక పరిజ్ఞానం సక్రమంగా వినియోగిస్తే చార్జీలు పెంచడం కాక తగ్గించ వచ్చు. పొదుపు మూలంగా ఉత్పత్తి భారం తగ్గుతుంది. కాలుష్య నియంత్రణ చేయవచ్చు.</p>	<p>కాలం కు నిర్ణయించిన పంపిణీ నష్టాలు ను పరిగనించడమైనది విద్యుత్ పంపిణీ నష్టాలను తగ్గించుట అందుబాటులో ఉన్న చర్యలను తీసుకోవడమైనది. ఫలితంగా 2008-09 సంవత్సరం లో 16.94% గా ఉన్న పంపిణీ నష్టాలు 2013-14 సంవత్సరానికి 13.20%కు తగ్గించడం జరిగింది.</p>
7	<p><u>ట్రూ అప్</u> గత ఖర్చులకు వివరణ లేకుండా ట్రూ అప్ విధానం పాటించడం ఏపాటి సరిఅయినది. ఈఆర్.సి అనుమతించరాదు.</p>	<p>గౌరవ కమీషన్ వారు జారీ చేసిన రెగ్యులేషన్ ను అనుసరించి గతములో కమీషన్ ఆమోదించిన మరియు వాస్తవాలకు మధ్యగల వ్యత్యాసమును. పెరుగుదల (True-up) తగ్గుదల (True-down) రూపంలో ప్రతిపాదించడమైనది.</p>
8	<p>విద్యుత్ షాక్ తో ప్రాణ, ఆస్తి నష్టం జరుగుతుంది. నివారణకు తగిన చర్యలు తీసుకోవాలి. మరణించిన వారికి కనీసం 10 లక్షలు ఎక్స్ గ్రేషియా ఇవ్వాలి. పశువులు, ఇతర జీవులు చనిపోతే వాటన్నిటిని అంచనా వేసి తగిన నష్ట పరిహారం ఇవ్వాలి. ముఖ్యంగా షాక్ నివారణా చర్యల పై కేంద్రీకరించాలి..</p>	<p>విద్యుత్ ప్రమాదాల నియంత్రణ వ్యర్థాలలో బాగంగా లుస్ లైస్ సరిచేయడం, మధ్య పోలులు ఏర్పాటు చేయుట, ట్రాన్స్ ఫార్మర్ వద్ద కంచె ఏర్పాటు చేయుట, ట్రాన్స్ ఫార్మర్ వద్ద ఎర్త్ ను సరిచేయడం తో పాటు విద్యుత్ ప్రమాదాల పై అవగాహన పెంపొందించే కార్యక్రమాలు చేయడం జరుగుతుంది.</p>

S.No	Summary of Objections / Suggestions	Response of the Licensee
	31. R.V. Rama Mohan, Director, CWS, 12-13-451, Street No.1, Tarnaka, Secunderabad – 500 017	
1.	<p>CWS is a public charity that does not have any commercial interests and has been working towards the upliftment of poor and their livelihoods in rural areas. These NGOs are charitable organisations and they do not have any commercial or profit-making interests. But, currently the Electricity Distribution Companies are treating the offices of these NGOs as “Commercial Entities” and charging them under “LT-II. Therefore, I request you to create a separate sub-category “Charities” under the category “LT-II-Other than Domestic/Commercial” and charge them under subsidised tariff as that of LT-I for domestic purpose.</p>	<p>It is to inform that as per the Tariff Order 2013-14, LT-II Non-Domestic/Commercial category is applicable for supply of energy to:</p> <ul style="list-style-type: none"> a) Consumers who undertake Non Domestic activity. b) Consumers who undertake Commercial activity. c) <i>Consumers who do not fall in any other LT category i.e., LT-I, LT-III to LT-VIII categories.</i> d) Consumers who avail supply of energy for lighting, fans, heating, air conditioning and power appliances in Commercial or Non-Domestic premises such as shops, business houses, offices, public buildings, hospitals, hostels, hotels, choultries, restaurants, clubs, theatres, cinema halls, bus stations, railway stations, timber depots, photo studios, printing presses etc. e) Educational Institutions run by individuals, Non- Government Organisations or Private Trusts and their student hostels are also classified under this category. <p>Hence the Category-II is applicable, if the activity does not fall in any other categories.</p> <p>However it is further to inform that as per the Tariff Order 2013-14, LT-VII(A) category is applicable for supply of energy to places of <i>worship like Churches, Temples, Mosques, Gurudwaras, Crematoriums, Government Educational Institutions and Student Hostels run by Government agencies, Charitable Institutions i.e., Public charitable trusts and societies registered under the Societies Registration Act running educational and medical institutions on a no profit basis, recognized service institutions and registered old age homes.</i></p>

S.No	Summary of Objections / Suggestions	Response of the Licensee																								
32. M. Jagadeeshwar, Managing Director, HMWSSB																										
1.	<p>The misapplication of the definition of “Industry” consequent to wrongful import of the definition from irrelevant statute and thereby incorrect categorisation has been unduly taxing the Board revenues while depriving it of rightful congenial payment terms and rates. Further the Board is being charged at an additional Rs.1/- charge per unit of consumption during peak hours exacerbating the efforts to reduce costs.</p> <p>A special power tariff needs to be provided in view of the legal status of the Board and nature of service rendered to the citizens as mandated under the constitution instead of classifying it as an industry for levy of power tariff which is grossly incorrect and needs to be redressed.</p> <p>The table given below, comparing the tariff levied in Bengaluru and Hyderabad clarifies the needs for re-classification.</p> <table border="1" data-bbox="306 889 1473 1421"> <thead> <tr> <th>Sl.No.</th> <th>Nature of the charges/tariff</th> <th>Bengaluru</th> <th>Hyderabad</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Category of Billing</td> <td>Separate category created for BWSSB installations</td> <td>Industry</td> </tr> <tr> <td>2</td> <td>Demand charges per KVA</td> <td>Rs.180/KVA/PM</td> <td>Rs.350/KVA/PM</td> </tr> <tr> <td>3</td> <td>Rate per unit</td> <td>Rs.3.80/unit</td> <td>Rs.5.73/unit</td> </tr> <tr> <td>4</td> <td>Rebate for pumping during No-peak hours i.e., 10:00 PM to 6:00 AM</td> <td>Rs.1.25/unit</td> <td>No rebate</td> </tr> <tr> <td>5</td> <td>Peak hours charges 6PM</td> <td></td> <td>Rs.1.00/unit</td> </tr> </tbody> </table>	Sl.No.	Nature of the charges/tariff	Bengaluru	Hyderabad	1	Category of Billing	Separate category created for BWSSB installations	Industry	2	Demand charges per KVA	Rs.180/KVA/PM	Rs.350/KVA/PM	3	Rate per unit	Rs.3.80/unit	Rs.5.73/unit	4	Rebate for pumping during No-peak hours i.e., 10:00 PM to 6:00 AM	Rs.1.25/unit	No rebate	5	Peak hours charges 6PM		Rs.1.00/unit	<p>It is to inform that tariff design varies from state to state depending on various factors like average cost of service, cross subsidy , government policy decisions, demand supply gap etc. Hence we cannot equate the tariff with other states.</p> <p>Collection of time of day tariff is not meant for extra revenue gain and it is only to meet the extra power purchase expenditure incurred by the Discoms during peak hours. Further in Bengaluru, peak charges of Rs.1.00/- also exists during 6 pm to 10 pm for the consumers who avails non peak rebate.</p> <p>As per the Tariff Order issued by the then Hon Commission for FY2013-14, Water Works & Sewerage Pumping Stations operated by Government Departments comes under HT-I category. Though HT-I category name is Industry, the then Hon’ble Commission extended this category tariffs to few other activities like poultry farms, pisciculture prawn culture inclusive of Water Works & Sewerage Pumping Stations operated by Government Departments not to highly burden the consumer as this only the lowest tariff in HT Categories (except LI schemes and agriculture).</p> <p>Presently Distribution Company is facing huge financial crisis as there is huge gap between the Aggregate Revenue Requirement and the Revenue realisation i.e. for FY2015-16, it is Rs.3512.79 crore with existing tariffs</p>
Sl.No.	Nature of the charges/tariff	Bengaluru	Hyderabad																							
1	Category of Billing	Separate category created for BWSSB installations	Industry																							
2	Demand charges per KVA	Rs.180/KVA/PM	Rs.350/KVA/PM																							
3	Rate per unit	Rs.3.80/unit	Rs.5.73/unit																							
4	Rebate for pumping during No-peak hours i.e., 10:00 PM to 6:00 AM	Rs.1.25/unit	No rebate																							
5	Peak hours charges 6PM		Rs.1.00/unit																							

	to 10PM			<p>and Rs.2687.18 crore with the proposed tariffs. Hence it is not feasible to reduce the tariffs.</p>
<p>The only option left to the Board is to seek remedy through concessional power tariff to reduce high operating cost and budgetary support from the Government of Telangana State for project financing and debt service requirements as the capital expenditure constitutes more than two-third of the total funds requirement and its growing substantially.</p> <p>Hence our plea to classify water board consumption on par with Bengaluru apart from waiving the peak hour consumption charges of Rs.1/- and extend rebate for non-peak hours consumption.</p> <p>I request that necessary action may be taken to levy concessional tariff to HMWSSB installations.</p>				

S.No	Summary of Objections / Suggestions	Response of the Licensee
	33. Sri Kommidi Narsimha Reddy, Ex-MLA, Convenor, Prja Chaithanya Vedika, Brahmanpalli (V), Bibinagr (MA), Nalgonda Dist.	
2	రెగ్యులేటరీ కమిషన్ వారు నిర్దేశించిన "స్టాండర్డ్స్ అఫ్ పర్ఫార్మెన్సు: చర్యలను పటిష్టంగా చేయాలనీ కోరుతున్నాను	లైసెన్సీ వారు, కమిషన్ వారిచే జారీ చేయబడిన SOP రెగ్యులేషన్ కి కట్టుబడి వున్నారు
3	విద్యుత్ సంస్థకు వచ్చే నష్టాలకు వ్యవసాయ విద్యుత్ యే కారణమని తేల్చడం దురదృష్టకరం. 'ప్రకృతిలో పుట్టి, ప్రకృతిని నమ్మి, ప్రకృతిని నిరంతరం కాపాడుతున్న 'మట్టి మనిషి వ్యవసాయదారుడు వృక్ష సంపద, పశు పక్ష్యాదులను కాపాడడమే కాకుండా సంస్కృతిని సైతం కాపాడుతున్నాడు. అందరికీ ఇచ్చే వాడే కాని, చేయూ చాచి అడిగేవాడు కాదు రైతు. ప్రకృతి మూలాధారమైన రైతును చేయని తప్పుకు బలి చేయడం సరికాదు	లైసెన్సీ వారు ఎక్కడ కూడా నష్టాలూ వ్యవసాయానికి విద్యుత్ సరఫరా చేయడం వలన వచ్చినవని తెలుపలేదు .
4	ప్రతిపాదనలు: వ్యవసాయ విద్యుత్ కు యూనిట్ ఒక్కొటికి 0.10 పైసల నుంచి 0.20 పైసల వరకు (జల విద్యుత్ ఉత్పత్తి వ్యయంతో సమానంగా) విద్యుత్ టారిఫ్ లను నిర్ధారించి నిరంత విద్యుత్ సరఫరా చెయ్యాలని ప్రజా చైతన్య వేదిక ప్రతిపాదిస్తోంది.	లైసెన్సీ పరిధిలో లేదు
5	5 హీచ్.పి. లోపు విద్యుత్ ను వినియోగించు చిన్న పరిశ్రమలను కుటీర పరిశ్రమలుగా గుర్తించడం సమంజసమని భావిస్తున్నాం.	లైసెన్సీ పరిధిలో లేదు
6	గృహ, వ్యాపార వినియోగదారులకు తాము చేయని పొరపాట్లకు బాధ్యులను చెస్తూ మానసిక హింసకు గురి చాయకుండా, ఉద్యోగులు వినియోగదారులతో సుహృద్భావంతో, స్నేహపూర్వకంగా మేలిగెట్టు చర్యలు గైకోనాలి	మీ సూచనను ఆమలుచేయబాడును
7	హీచ్.టి. 4 లో ట్రాన్సిఫ్, కాలనిలను ఏ, బి, సి లుగా మార్పు చేసి టారిఫ్ రేట్లను సవరించాలి.	లైసెన్సీ పరిధిలో లేదు

8	<p>ఈ నిస్సహాయులైన వినియోగదారుల స్థితిగతులను ప్రత్యేకంగా పరిగణించి. పరిశీలించి విద్యుత్ కంపెనీలకు తగు మార్గదర్శకాలను చేసి అమలు చేయాల్సిందిగా విద్యుత్ రెగ్యులేటరీ కమిషన్ గౌరవ చైర్మన్ గారిని, గౌరవ సభ్యులను కోరుతున్నాను.</p>	<p>లైసెన్సి పరిధిలో లేదు</p>
---	--	------------------------------

S.No	Summary of Objections / Suggestions	Response of the Licensee
34	K.Santosh Kumar, Flat No.305/98, Singapore Township, Ghatkesar (M), Rangareddy District	
35	G. Gopal Reddy, Advocate, D.No.101, Khan Enclave, Block H-9, Hyderabad - 38	
36	Ranga Reddy, Thoramamidi (V), Bantaram (M), Ranga Reddy District	
37	Laxma Reddy, Thoramamidi (V), Bantaram (M), Ranga Reddy District	
38	Muralidhar Reddy, Kalivemula (V), Sangareddy (M), Medak District	
39	B. Narsimha Reddy, Kasala (V), Hathnoora (M), Medak District	
40	P. Sadananda Reddy, Shivampeta (V), Vulukal (M), Medak District	
41	K.Muralidhar Reddy, 3-1-74/25, Ramshankar Nagar, Ramanthapur, Hyderabad	
42	P. Narsimha Reddy, Nandikandi (v), Sadasivpet (M), Ranga Reddy District	
43	B. Madhusudhan Reddy, Advocate, H.No.3-9-94, S.V.Residency, Ramanthapur, Hyderabad	
44	K. Sai Reddy, 2-1-174/92, Bharatiya Kisan Sangh Office, Nallakunta, Hyd - 44	
45	A.Surender Reddy, 2-1-174/G2, Bharatiya Kisan Sangh Office, Nallakunta, Hyd - 44	
46	K.Koteswar Rao, 2-1-174/G2, Bharatiya Kisan Sangh Office, Nallakunta, Hyd - 44	
47	M. Ram Prasad, 2-1-174/G2, Bharatiya Kisan Sangh Office, Nallakunta, Hyd - 44	
48	M.Sridhar Reddy, 2-1-174/504, Rajput Residency, Nallakunta, Hyd	
49	Donuru Ramu, 2-1-174/G2, Bharatiya Kisan Sangh Office, Nallakunta, Hyd - 44	
50	Parmadi Anjireddy, 2-1-174/G2, Bharatiya Kisan Sangh Office, Nallakunta, Hyd - 44	
51	J.Sri Rangarao, Flat No.503, 2-2-18/18/7, C-29, Near Ahobilam Math, DD Colony, Shivam Road, Hyd	
52	Gundeti Chinaa Reddy, Deepalle (V), Naveepeta (M), Mahaboobnagar District	
53	B. Ashok Yadav, Devuda Mamidipally (V), Kothur (M), Mahaboobnagar District	

- 54 **Sharanappa, Jagithyal (V), Balanagar (M), Mahaboobnagar District**
- 55 **Lankaala Prabhakar Reddy, Vishwanathpur (V), Kondurg (M), Mahaboobnagar District**
- 56 **Karakala Jagpal Reddy, 11-99/1, Jaganmohan Reddy Compound, Nethaji Nagar, Jadcherla (M), Mahaboobnagar District**
- 57 **Palle Srinivas Reddy, Palem (V), Kothakota (M), Mahaboobnagar District**
- 58 **K. Krishna Reddy, 11-99/1, Jaganmohan Reddy Compound, Nethaji Nagar, Jadcherla (M), Mahaboobnagar District**
- 59 **Mallappa Gattupalli, Polkampalli (V), Parigi (M), Rangareddy District**
- 60 **K. Subba Reddy, Subanpur (V), Parigi (M), Rangareddy District**
- 61 **Kandada Ambat Reddy, S/o.Raji Reddy, Narayanpur (V), Vikarabad (M), Rangareddy District**
- 62 **Kerelli Mallareddy, S/o.Manikya Reddy, Kothagudu (V), Vikarabad (M), Rangareddy District**
- 63 **Chandrakanth Chari, Adarshnagar, Near Ganesh Temple, Tandur (M), Rangareddy District**
- 64 **Pabbathi Ramachandra Reddy, D.No.2-2-143/6N, Adarshnagar, Tandur (M), Rangareddy District**
- 65 **Yasa Narsi Reddy, Thettibayi (V), Voligonda (M), Nalgonda District**
- 66 **B. Indra Reddy, Chandana Palli (V), Nalgonda (Mandal & District)**
- 67 **D.Danayya, Ex-Sarpanch, Buddharam (V), Nalgonda (Mandal & District)**
- 68 **Pisati Satti Reddy, Mermu Gudem (V), Chityal (M), Nalgonda District**
- 69 **K. Anantha Reddy, H.No.5-116, Rd.No.6, Adarsh Nagar, Sherlingampally, Hyderabad - 19**
- 70 **Bhopal Reddy, Cherlapalli (V), Thipparthi (M), Nalgonda District**
- 71 **Manyam Satyanarayana Reddy, Eedula Gudem (V), Miryalaguda (M), Near TV Tower, Nalgonda District**
- 72 **Koppula Venkat Reddy, H.No.4-7-527/1, Rd.No.1, DVK Road, Nilagiri Colony, Nalgonda District**
- 73 **Nookala Satyanarayana Reddy, TPUS, Ramagiri city, Nalgonda District**

- 74 **Kunta Malla Reddy, Endapally Vg, Velagatur (M), Karimnagar (Dt)**
- 75 **Gandra Prasad Rao, Rampally (Vg), Golla pally (M), Karimnagar (Dt), Ph.No.9949747991**
- 76 **Muduganti Malla reddy, Gopalapuram (Vg), Ramadugu (M), Karimnagar (Dt), Ph.No.90441613722**
- 77 **Baddam Laxma Reddy, Venkatraopally (Vg), Ramadugu (M), karimnagar (Dt), Ph.No.9989359345**
- 78 **Ashok Reddy(Aadarsha Rythu), Revelli (Vg), Choppadanda (M), Karimnagar (Dt)**
- 79 **Papi Reddy, Revelli(Vg), Choppadanda (M), Karimnagar (Dt), Ph.No.9912105304**
- 80 **Nimma Narayana Reddy, Narayanapuram(Vg), Ellareddy peta (M), Karimnagar (Dt),
Ph.No.9963442381**
- 81 **Devayya dyapa, Rajannapet(Vg), Ellareddy peta (M), Karimnagar (Dt), Ph.No.7893816675**
- 82 **Ippa Rajender (Ex.Surpanch), Dharmaram(Vg), Mallapur (M), Karimnagar (Dt), Ph.No.9490152929**
- 83 **Dabba Ravi, Jagga Sagar (Vg), Metpally (M), Karimnagar (Dt), Ph.No.9908295502**
- 84 **Dhonuru Ramu, H.No.2-1-174/G2, Rajputh Residency, Nallakunta, Hyderabad-44.
Ph.No.9441901736**
- 85 **Malala Rao, Rajeshwara rao pally, Jublinagar (Po), Venkatapur (M), Warangal (Dt).**
- 86 **Sambasivareddy, Rajeshwara rao pally, Jublinagar (Po), Venkatapur (M), Warangal (Dt).**
- 87 **K.Raghotham Reddy, Jublinagar (Vg), Regunta (M), Warangal (Dt)**
- 88 **Kandi Yadava Reddy, Ramanjapur(Vg), Venkatapur (M), Warangal (Dt).**
- 89 **M.Srinivasa Reddy, Singirakunta palle (Vg), Narsapur (Po), Malugu (M), Warangal (Dt)**
- 90 **Nanjula Apparao, Thimmineni palem (Vg), Khammam (M&Dt)**
- 91 **Nageshwara Rao, Lakshmipuram (Vg), Bhodhakal (M), Khammam (Dt)**
- 92 **Kilaru Ramakoteshwara Rao, Lakshmipuram (Vg), Bhodhakal (M), Khammam (Dt),
Ph.No.9866803668**
- 93 **Hanmantha Rao, Chekkara (Vg), Maddur (M), Nizamabad (Dt)**

- 94 Vittal Rao Rtd MEO, Kupriyala (Vg), Sadasiva nagar (M), Nizamabad (Dt)
- 95 Venkat Reddy, Kupriyala (Vg), Sadasiva nagar (M), Nizamabad (Dt), Ph.No.9440037785
- 96 Vittal Reddy, Errapahad (Vg), Thadvai (M), Nizamabad (Dt), Ph.No.8106864571
- 97 S.Rajeswar Reddy, Gumriyyala (Vg), Morkhad(M), Nizamabad (Dt)
- 98 Ananda Rao, Brahminapally (Vg&Po), Thadvayi (M), Nizamabad (Dt), Ph.No.9492475745
- 99 Muduganti Sridhar Reddy, H.No.2-1-174&175/504, Rajputh Residency, Nallakunta, Hyderabad-44. Ph.No.9866381090
- 100 A.Surender Reddy, H.No.2-1-174/G2, Rajputh Residency, Nallakunta, Hyderabad-44. Ph.No.9505518335
- 101 K.Sai Reddy, H.No.11-1-1815, Maruthinagar, Nizamabad (Dt), Ph.No.9494428698
- 102 J.Sriranga Rao, Flat No.503, Srilaxmi Salitude, 2-2-18/18/7; C-29, Ahobilam matham daggara, D.D.Colony, Shivam Road, Hyderabad. Ph.No.9246533243
- 103 M.Ram Prasad, 2-1-174/G2, Nalla kunta, Hyderabad-44. Ph.No.7569456548
- 104 Goli Gopala Reddy, Advocate, D.No.101; Mona Enclave, Block;H-9, Madhura nagar, Hyd-38. Ph.No.9908604545
- 105 Parmada Anji Reddy, 2-1-174/G2; Rajputh Residency, Nallakunta, Hyderabad-44. Ph.No.9989334612
- 106 Surender Reddy, D.No.9-9-296, Ram Nagar, Near TV Station, Karimnagar (Dt)-505009, Ph.No.9440438255
- 107 Malla Reddy Surpanch, Ramulapally (Vg), Pagidipally (M), Karimnagar (Dt), Ph.No.7702634690
- 108 Pulakam Aneel, S/o.Sattaiah, Ramulapally (Vg), Pagidipally (M), Karimnagar (Dt).
- 109 Nallam Mallaiha, S/o. Nallaiha, Ramulapalli (V), Pagidipalli (M), Karimanagar District. Ph.No.
- 110 Harigopal, Nacharla (V), Pagidipalli (M), Karimanagar District. Ph.No. 9000017256
- 111 Narender Reddy, H.No. 1-8-492, Balasamudram, Hanumakonda, Warangal District.
- 112 Srinuvasa Reddy, Baratiya Kisan Sangam, Urukonda (V), Hanumakonda (M), Warangal District.

113	Rangareddy, H.No. 1-8-492, Balasamudram, Hanumakonda, Warangal District. Ph.No. 9573823250
114	Upendarreddy, H.No. 1-8-492, Balasamudram, Hanumakonda, Warangal District. Ph.No. 9441903006
115	Shanthireddy, (V&M), Regonda, Warangal (District) Ph.No. 7659997086
116	Thirupatireddy, Rtd Teacher, Narmakapalli, Parakala, Warangal District. Ph.No. 9390115530
117	K. Lakshmareddy, H.No. 2-2-470/302, Raghavendhra Residency, Police Head Quarters Venuka, Hanumakonda, Warangal District. Ph.No. 9866063459
118	Lekkala Jalandhar Reddy, Advocate Colony, Road No. 4, Hanumakonda, Warangal District. Ph.No. 9949232255
119	Surender Reddy, Vellampalli (V), Chityala, Warngal (District). Ph.No. 9908295180
120	Kothuru Raju, Alleti ramaihapalli (V), Chityala, Warngal (District).
121	Kadukula Ramireddy, Alleti ramaihapalli (V), Chityala, Warngal (District). Ph.No. 9640697091
122	Kodela Sammaiha, (V&M), Chityala, Warngal (District). Ph.No. 9848986989
123	P. Rajireddy, H.No. 2-18, Parakala (M), Warangal (District) – 506164. Ph.No. 9440994348
124	Kottaiha, R.S.S.Off. Mamillagudam, Khammam District. Ph.No. 9951258091
125	Parmada Anjireddy, No. 2-1-174 & 175/42, Nallakunta Hyderabad. Ph.No. 9491781566
126	Muruganti Sridhar Reddy, No. 2-1-174/504, Nallakunta, Hyderabad – 044. Ph.No. 9866381090
1	<p>కేంద్ర ప్రభుత్వమూ సమీప బావిశాతులో డిస్ట్రిబ్యూషన్ ఇతర సేవలు కొరకై ప్రైవేట్ సంస్థలకు అనుమతించాలనే ఆలోచనలో ఉన్నది. ప్రైవేట్ సంస్థలు ప్రవేశించిన తరువాత ప్రభుత్వరంగ సంస్థల కార్యకలాపాలు, వ్యాపారాలను నిరోధించడానికి ప్రైవేట్ వారు వారి సమర్థతను ప్రదర్శిస్తారు. విరి కుయుక్తులు కూడా అమలూ చేస్తారు. కావున ప్రభుత్వరంగ సంస్థలైన డిస్ట్రిబ్యూషన్ కంపెనీ పారదర్శకతను పెంచుతూ ప్రస్తుతం ఉన్న విశ్రుకాలమైన అవినీతిని విద్యుత్ చట్టం, 2003 సవరణలు, పార్లమెంట్ సెలెక్ట్ కమిటీ పరిశీలన చేస్తున్నారు, నిర్ణయం ఇంకా తీసుకోవాలి. డిస్కామ్ పంపిణీ నష్టాలు తగ్గించుకోడానికి అనేక కార్యక్రమాలు చేపట్టింది మరియు నష్టాలు డిస్కాం ఏర్పడిన తరువాత 27% నుండి 12%కు తగ్గింది. వినియోగదారు సేవలు మెరుగుపర్చేందుకు 14 ఇంటిగ్రేటెడ్ కస్టమర్ సర్వీస్</p>

	<p>కట్టడి చేసి జవాబుదారితనాన్ని పెంచుతూ నిజేతిపరులైన అధికారులకు ప్రాధాన్యత ఇచ్చి సంస్థ సమర్థతను పెంచుకోవాల్సిన అవసరం, బాధ్యత ఉధీ. కావున దిస్కంస్లకు తగిన మార్గదర్శం ఇస్తూ నీగ కూడా చేయాడానికి నియంత్రణ మడలి ద్వారా వ్యవస్థను (ఒక డైరెక్టర్; ఈ రంగంలో అనుబంధం గల స్వచంద సేవకుడు) (కన్స్యూమర్ వెల్ఫేర్ పెర్ఫార్మన్స్ ఇంప్రూవ్మెంట్) ఏర్పాటు చేసి సంస్థను వినియోగదారునికి మరియు ఉపాది పొందుతున్న ఉపాది ఆశిస్తున్న వర్గాల వారిని కూడా కాపాడగలరని ప్రర్తిస్తునము.</p>	<p>కేంద్రాలు (ICSCs) మరియు 63 కస్టమర్ సర్వీస్ కేంద్రాలు (CSCs) ఏర్పాటు చేయడం జరిగింది. మరియు డిస్కాం రాష్ట్రం రెగ్యులేటరీ ప్రమాణాల [Standards of Performance (SoP)] ప్రకారం సేవలు అందిస్తున్నాయి</p>
2	<p>విద్యుత్ వలస జరిగే దుర్మరణాలు:</p> <ol style="list-style-type: none"> i. రాత్రి వేళల్లో విద్యుత్ సరఫరా ii. లైన్ల త్రాన్స్ఫార్మర్ల నిర్వహణ లోపం iii. క్షేత్రస్థాయి సిబ్బంది సకాలంలో స్పందించక పోవడం iv. ఉన్నతాధికారులు (దుర్మరణాలకు) ప్రజలు ప్రాణాలకు విలువ నియకపోవడం, కనీసం దుర్మరణం తర్వాత సంగటన జరిగిన ప్రదేశానికి వెళ్లి పరిశీలించాక పోవడం. v. ట్రాన్స్ఫార్మర్ వద్ద నిర్వహణ (తగినంత తేమ లేకపోవడం) లేకపోవడం. vi. బూమికి అంటేటట్టుగా కండక్టర్ వేలడడం, స్తంబమునకు స్తంబమునకు మధ్య దూరం అకువగా ఉండటం, కాండుక్టర్లు రెండుగా చేసి ఎక్కువ దూరం లాగడం. vii. నాణ్యత పాటించకపోవడం: సాయిరెడ్డిగుడం, శబద్మండలం, రంగారెడ్డి జిల్లలో లింగారెడ్డి అలియాస్ ప్రశాంత్రెడ్డి అను 23 సవచ్రాల వెక్తి కండక్టర్ పడీ దుర్మరణం పలయాడు. ఇతడి గురుంచి ఎక్స్-గ్రీయ్యుయ ఇవ్వలేదని 	<ol style="list-style-type: none"> i. రాత్రి వేళల్లో విద్యుత్ సరఫరా విద్యుత్ ప్రమాదాలకు కారణం కాదు ii. విద్యుత్ లైన్లు మరియు ట్రాన్స్ఫార్మర్ల నిర్వహణా చేయబడుచున్నది. iii. క్షేత్రస్థాయి సిబ్బందికి సకాలంలో అన్ని నమస్యలను పరిష్కరించుటకు ఆదేశాలు ఇవ్వబడుచున్నవి సంభదిత ఎ.డి.ఇ. మరియు డి.ఇ. రిపోర్ట్ ఇవ్వడానికి క్షేత్రస్థాయిలో పరిశీలించుచున్నారు. v. ట్రాన్స్ఫార్మర్ ఎర్త్ సమస్య ఉన్నచో కొత్త ఎర్త్ వెయబడుచున్నది. vi. మధ్యస్థ స్తంభములు వేయుట మరియు కండక్టర్ సరిలేని చోట మార్చబడుచున్నవి. vii. నాణ్యత పాటించుటకు అన్ని చేర్యలు తీసుకొనబడినవి మా నిబంధనల ప్రకారం ఒక లక్ష రూపాయలు చెల్లించడం జరిగినది. మా రికార్డుల ప్రకారం ఎలాంటి పీర్యాదు లేదు.

	<p>గత బహిరంగ విచారణలో ప్రశ్నిశ్చేయ వారంలోగా చేలిస్తామని చెప్పి నేలతర్యత ఒక లక్ష రుపలలు చేలించారు గౌరవ సి.జి.అర్.ఆఫ్ వారు ఎక్స్లెయియా అప్పటికే రొండు లక్షగాలుగా పెంచారు. గౌరవ సి.జి.అర్.ఆఫ్ వారు ఎక్స్లెయియా అప్పటికే రొండు లక్షగాలుగా పెంచారు. అయినా ఒక లక్షనే ఇచ్చారు. కండక్టర్ తెగిపడి మనుషులు ప్రమాదానికి లోనై చనిపోతారని బి.కె.ఎస్. గ్రామ ఆధాకుడు ఎ.ఇ గారికి అప్లికేషన్ ఇచ్చి రసీదు తీసుకున్న 31 రోజులకు ఈ దుర్మరణం జరిగింది. ఇది బాధ్యతా రాహిత్యంతో చేసిన హత్యగానే భావించి 10 లక్షల ప్రతైక్య ఎక్స్-గ్రేషియా చేలించాలని ప్రర్షిస్తున్నాం. గ్రామ ఆధాకుడు ఎ.ఇ గారికి అప్లికేషన్ ఇచ్చి రసీదు తీసుకున్న 31 రోజులకు ఈ దుర్మరణం జరిగింది. ఇది బాధ్యతా రాహిత్యంతో చేసిన హత్యగానే భావించి 10 లక్షల ప్రతైక్య ఎక్స్-గ్రేషియా చేలించాలని ప్రర్షిస్తున్నాం.</p>	
	<p>వ్యవసాయదరులకు ప్రభుత్వం తెలిపిన విదంగా 7 గంటల విద్యుత్ సరఫరా చేయడంలో విపలం చెందుతున్నారు. విదీగా 7 గంటలు విద్యుత్ సరఫరా చేయడానికి తగు చర్యలు గైకోనగాలరని ప్రార్షిస్తున్నము.</p>	<p>ప్రస్తుతము సరిపడా విద్యుత్ లభ్యత లేనందున 6 గంటలు నుండి 7 గంటల విద్యుత్ సరఫరా ఇవ్వడం జరుగుచున్నది. వచ్చే కొద్ది నెలలో KTRP నుండి 600 మెగావాట్ల, సింగరేణి నుండి 600 మెగావాట్ల మరియు సౌర విద్యుత్ 300 నుండి 400 మెగావాట్ల వరకు విద్యుత్ ఉత్పత్తి జరగనున్నది. ఆ విద్యుత్ ఉత్పత్తి అందుబాటులోకి వచ్చిన వెంటనే విధిగా 7 గంటల విద్యుత్ సరఫరా చేయ బడును.</p>
3	<p>H.V.D.S. ట్రాన్స్ ఫార్మర్ల ఎక్కువ ఖర్చుతో కూడుకున్నదీ. 5 నుండి 6 వంతులు ఎక్కువ ఖర్చు అవుతుంది. వీటికి ఖర్చు పెట్టిన స్థాయిలో లాభం ఉండడం లేదు. కోట్లాధీ రూ. లు</p>	<p>చిన్న సామర్థ్యం గల ట్రాన్స్ఫార్మర్ల (DTRs) TSSPDCL లో కొత్త వ్యవసాయ సేవల కొరకు వినియోగిస్తున్నారు. మరియు HVDS పథకంలో, ఇప్పటికే</p>

	<p>డబ్బు దుర్వినియోగం అవుతుంది. దీని పై పునరాలోచన జరిపి ప్రజాదనని కాపాడగలరని ప్రార్థన.</p>	<p>63/100 kVA సామర్థ్యం గల ట్రాన్స్ఫార్మర్లు స్థానంలో చిన్న సామర్థ్యం గల ట్రాన్స్ఫార్మర్లను నెలకొల్పడము జరిగింది HVDS యొక్క ప్రధాన ప్రయోజనాలు, దొంగతనం అరికట్టడము, వోల్టేజీ ప్రొఫైల్, DTR వైఫల్యాలు తగ్గించడము మరియు అక్రమ కనెక్షన్ క్రమబద్ధీకరణ, LT లైన్ నష్టాలు తగ్గింపు, మొదలగునవి.</p>
	<p>ఎర్త్ సరిగాలేక గ్రామాల్లోని చాల ఇంట్లకు విద్యుత్ షాక్ వస్తుంది. దీనితో సెల్ ఫోన్ ఛార్జింగ్ పెడుతూ దుర్మరణం పాలవుతున్నారు. విద్యుత్ ఉపకరణాలు టి.వి. లాంటివి కూడా కాలిపోతున్నాయి.</p>	<p>గ్రామీణ ప్రాంతాల్లో విద్యుత్తు సరఫరా సింగల్ ఫేస్ DTRs ద్వారా విస్తరించింది. ట్రాన్స్ఫార్మర్ యొక్క ఎర్త్ నిర్మాణాలు CI పైపులు మరియు GI ప్లాట్ స్ట్రీప్ తో ప్రామాణికతో ఎర్పాటు చేయడము జరుగుతుంది. కాలంతోపాటు, కనెక్షన్స్ వదులు మరియు వేర్ అండ్ టార్ మూలంగా వోల్టేజీ హెచ్చుతగ్గులకు దారి తీస్తుంది. వీటిని నివారించేందుకు, డిస్కాం సరైన earthing కోసం ఫీల్డ్ సిబ్బందికి ఎర్త్ సరిదిద్దుటకు ఆదేశాలు ఇవ్వడము జరిగింది. ప్రమాణికం కాని వైరింగ్ కలిగిన ఇళ్ళు గ్రామీణ ప్రాంతాల్లో విద్యుత్ ప్రమాదాలులకు ముఖ్య కారణము</p>
4	<p>D.T.R. మరమ్మతులు విషయంలో పారధరకత లోపించింది. అవినీతి ఎక్కువగా ఉంది, దీని నివారణ నిమిత్తమై ప్రతి సెక్షన్ స్థాయిలో కేవలంగా ఈ పని నిమ్మమై నలుగురు యువకులకు ఈ శిక్షణ ఇచ్చి రాత్రి ఇద్దరిని, పగలు ఇద్దరిని (పోలీస్ బ్లా కాట్స్) అందుబాటులో ఉంచి వినియోగాదరుల ఫోన్ చేసిన వెంటనే విరు ఆక్కడికి చేరుకొని (పిజ్జా డెలివరీ బాయ్స్) లాగా స్థానికంగా రిపేర్ అయితే చేసిపెట్టాలి. లేకుంటే అట్టి డి.టి.ఆర్. ను మరమ్మత్తు కేంద్రానికి</p>	<p>యస్.పి.యమ్. (SPM) సెంటర్ల నందు ట్రాన్స్ఫార్మర్ల మరమ్మత్తులు చేయబడుచున్నవి. ట్రాన్స్ఫార్మర్ స్ట్రక్చర్ల నందు సమస్య తలెత్తినచో సంబంధిత క్షేత్రస్థాయి సిబ్బంది పరిశీలించి మరమ్మత్తులు చేయుచున్నారు. ట్రాన్స్ఫార్మర్లు డిపార్ట్మెంట్ వాహనములో తరలించుటకు అన్ని చర్యలు తీసుకోబడినవి. 3 టన్నుల వాహనం, విఫలమైన మరియు బాగుచేసిన ట్రాన్స్ఫార్మర్ల రవాణా కోసం Subdivision అధికారి నియంత్రణలో ఉంచడము జరిగింది</p>

	<p>పంపించాలి. స్థానికంగా మరమ్మత్తు చేయగలిగే రిపేర్లను కూడా పూర్తిగా కాలిపోయినట్లుగా చూపించి బిల్లులు క్లెయిమ్ చేస్తున్నారు. దీనివలన ప్రజాధనం దుర్వినియోగం అవుతుంది. ప్రతి సెక్షన్లో ఒక TATA A.C. ను D.T.R. ట్రాన్స్ఫర్మర్ నిమిత్తం అందుబాటులో ఉంచాలి.</p>	
5	<p>క్షేత్రస్థాయిలో సిబ్బంది అయిన లైసెన్సీలను / హేల్పర్ల ఖాళీలను వెంటనే భర్తీ చేయాలి.</p>	<p>వివిధ కేసులు కోర్టుల్లో పెండింగ్ లో ఉన్నందున నియామకాలు ఆగినవి</p>
6	<p>వ్యవసాయ వినియోగదారుల పైన గ్రామీణ గృహ వినియోగదారుల పైన క్షేత్రస్థాయి సిబ్బంది బిల్లులు వసూలు చేయడం కొరకు ఫీజులు తొలగించడం స్టార్ట్ ధృ తీసుకుపోవడం సర్వీస్ వైర్ తీసుకెళ్ళి వ్యవసాయ పనులకు అంతరాయం కలిగిస్తున్నారు. ఈ దౌర్జన్యాలను ఆపాలి లక్షలాది రూపాయలు బకాయి ఉన్న వినియోగదారుల నుండి వసూలుకు తక్షణ చెర్యలు గైకోనాలి.</p>	<p>ఎవరైతే విద్యుత్ బిల్లుల చెల్లించరొ ఆట్టి వారి సర్వీసు కనేక్స్ ను తొలగించబడును. ఉచిత విద్యుత్ సదుపాయం కలిగిన వ్యవసాయ వినియోగదారులకు మాత్రం, ఒక సంవత్సరం పైబడి Customer Charges చెల్లించని వినియోగదారులకు దిస్కనెక్ట్ చేయడం జరుగును.</p>
7	<p>హైదరాబాద్ సౌత్ సర్కిల్లో 2013 సంవత్సరంలో 47.55% నష్టంగా దిస్కంలు వారు తెలిపారు. దీనిని తగ్గించడానికి తగు చర్యలు తీసుకుంటామని తెలిపినారు. ప్రస్తుత నష్టం ఎంత? ఎంత నష్టాన్ని తగ్గించారు. భావిష్యతులో ఏ చర్యలు తీసుకుంటారో తెలిపి నష్టాన్ని తగ్గించగలరు.</p>	<p>2014-15 సం. నకు గాను డిసెంబర్ 2014 వరకు హైదరాబాద్ సౌత్ సర్కిల్ నష్టాలు 46.05% గా నమోదు అయ్యాయి. మరియు డిస్కం వారు నష్టాలను తగ్గించడం కొరకు క్రింద పేర్కొనబడిన చర్యలు తీసుకొనుచున్నారు. విద్యుత్తు దొంగతనము అదుపులో ఉంచుట, సర్వీస్ లను సరైన కేటగిరి లోకి ఇవ్వడం, మెకానికల్ మీటర్లను ఎలక్ట్రానిక్ మీటర్లతో మార్చడం, ఇంటి లోపల ఉన్న మీటర్లను ఇంటి బయటికి మార్చడం, చెడిపోయిన మీటర్లను మార్చడం, UDC, OSL సర్వీస్ లను తనిఖీ చేయడం, అస్ ఆతరైసేడ్ (Unauthorised) సర్వీస్ లను క్రమబద్ధీకరించడం, మీటర్లను సీల్ చేయడం వంటివి. DPE వారిచే కేసులు నమోదు చేయడం/అస్సెస్స్మెంట్ చేసిన మొత్తం :</p>

హైదరాబాద్ సాత్ సర్కిల్ లో దొంగతనాన్ని అరికట్టేందుకు మరియు నష్టాలను తగ్గించడానికి నిరంతరంగా ఇంటిన్సిప్ తనిఖీలు చేపట్టుతున్నారు. గత కొన్ని నెలల నుండి హైదరాబాద్ సాత్ సర్కిల్ లో నమోదైన కేసులు నెల నెలకు పెరుగుతూ ఉన్నాయి. అంతే కాకుండా అస్సెస్స్ చేసిన మొత్తం ఇంతకు ముందు కంటే క్రింద చూపిన విధంగా పెరిగినది.

Sl. No	Period	నమోదు చేసిన కేసులు మొత్తం	
		No.	మొత్తం (రూ.లక్షలలో)
1	ఏప్రిల్ '10 - మార్చి '11	5015	292.96
2	ఏప్రిల్ '11 - మార్చి '12	3968	232.61
3	ఏప్రిల్ '12 - మార్చి '13	8933	536.11
4	ఏప్రిల్ '13 - జనవరి '14	7947	493.57
5	ఫిబ్రవరి '14 - ఫిబ్రవరి '15	11995	901.61

గత 5 సంవత్సరాల నుండి నమోదు చేయబడిన కేసులతో పోల్చిన ఈ సంవత్సరం నమోదు చేసిన కేసులు చాల అధికంగా కలవు. గత సంవత్సరం 7947 కేసులు

		<p>నమోదు చేయగా, ఈ సంవత్సరం 11,995 గా నమోదు చేయబడ్డాయి. అస్సెస్స్ చేసిన మొత్తం కూడా గత సంవత్సరం నందు (2013-14) రూ.494 లక్షలు కాగా ఈ సంవత్సరం (2014-15) నకు రూ.901 లక్షలు కలదు.</p> <p>గౌరవనీయ హై కోర్ట్ ఆదేశాల తర్వాత ఇంటిన్సివ్ తనిఖీలు నిరంతరంగా జరుగుతున్నాయి. TSSPDCL అధికారులు, 741 టీం లుగా ఏర్పడి 11 నెలల నుండి హైదరాబాద్ సౌత్ సర్కిల్ లో తనిఖీలు చేయడం వలన 18035 సర్వీస్ లను తనిఖీ చేసి 11995 కేసులు నమోదు చేసి రూ.9.01 కోట్ల మొత్తాన్ని అస్సెస్స్ చేశారు. నష్టాలు ఒక్క అంకెను చేరేంతవరకు ఈ తనిఖీలు ఇలాగే జరపాలని నిర్ణయించడమైనది.</p> <ul style="list-style-type: none"> • ఈ సర్వీస్ తనిఖీ ప్రక్రియలో మాల్ ప్రాక్టీస్ కేసులు కూడా నమోదు చేయబడ్డాయి. గృహ అవసరాలు మరియు వాణిజ్య అవసరాల యొక్క డెవలప్మెంట్ చార్జీలలో ఉన్న అధిక వ్యత్యాసం వలన ఈ మాల్ ప్రాక్టీస్ కేసులు నమోదు చేయబడుతున్నాయి. కొంత మంది వినియోగదారులు క్రొత్త సర్వీస్ ను గృహ అవసరాలు కోసం రిజిస్టర్ చేసుకొని తరువాత దానిని వాణిజ్య అవసరాల కోసం వాడుకుంటున్నారు. దీనివలన మాల్ ప్రాక్టీస్ కేసులు నమోదు చేయబడుతున్నవి. ఇప్పుడు గృహ అవసరాలు మరియు వాణిజ్య అవసరాల కు డెవెలప్ మెంట్ చార్జీలు ఒకే విధంగా మార్పడం జరిగింది. ఈ విషయాలను వినియోగదారులలో అవగాహన కల్పించడానికి
--	--	---

		అధికారులు కృషి చేస్తున్నారు. దీనివలన భవిష్యత్తులో మూల్ ప్రాక్టీస్ కేసులు తగ్గే అవకాశం కలదు.
8	<p>టోల్ ఫ్రీ నెంబర్ ద్వారా ఏ జిల్లాలో ఎన్ని కంప్లెంట్స్ వచ్చినవి. టోల్ ఫ్రీ నెంబర్ 1800 425 3600 మరియు 1800 425 0028 వినియోగదారులకు తెలియజేయడానికి చర్యలు గైకోనాలి. గతంలో ప్రతి లైన్ మెన్ కు లీటర్ కలర్ డబ్బా - రెండు బ్రష్ లు దిస్కంస్ల వారు ఇచ్చి హెల్పర్ తో ప్రతి గ్రామంలో బిల్ వసూలు కేంద్రంలో మరియు ట్రాన్స్ ఫోరమ్ పై టోల్ ఫ్రీ నెంబర్ వ్రాయిస్తుందని మేము సలహా ఇచ్చాము.</p> <p>అటువంటి పని ఏమైనా జరిగిందా, భవిష్యత్తులో నెంబర్ వ్రాసే చర్యలు ఏమైనా తీసుకుంటారో తెలుపగలరు T.S.N.P.D.C.L. వారు రైతు మిత్ర ఫోన్ నెంబర్ లు జిల్లా వారిగా ఇచ్చారు, తర్వాత ఆపివేశారు. రైతు మిత్ర వాహనం కూడా అందుబాటులోకి ఉన్నట్లు ఉంచి దానిని రద్దు చేశారు, అంటే రైతాంగానికి సమస్యలు లేకుండా చేసారా లేదా వీరి సమస్యలు పరిష్కరించావలసిన బాధ్యత మాకు లేదు అని అపివేశారా? అని కరీంనగర్ ఎస్.ఇ. గారిని అడిగితే కార్తికేయ మిశ్రా, సి.ఎం.డి. గారు వెళ్లారు, ఆ సౌకర్యాలు కూడా వారితో వెళ్ళిపోయాయి అని వ్యంగ్యంగా తెలిపారు. వ్యక్తులు మారితే వ్యవస్థ కుంతుపడుతుందా? ఇటువంటి వ్యవస్థ కుంతుపడుతుందా తగిన చర్యలు తీసుకోగలరని కోరుచున్నాము. టోల్ ఫ్రీ నెంబర్ కు ఫోన్ చేస్తే వెంటనే ఫోన్ ఎత్తరు. ఎత్తితే ఈ నెంబర్ ఎవరు ఇచ్చారు? ఎ.ఇ. గారికి చెప్పండి అని</p>	TSNPDCL లో ఈ సౌకర్యం అమలు పరిచి ఈప్పుడు మనెయడానికి గల కారణాలను పరిశీలించి తగు చర్యలు తీస్కోనబాడును.

	<p>అసంబద్ధమైన ప్రశ్నలు వేస్తారు. 1800 425 0028 మరియు 1800 425 3600కు వచ్చిన ఫిర్యాదులన్నింటికీ వారి ఫిర్యాదు సంఖ్య, తర్వాత చర్యలు, ఫిర్యాదుదారుని సెల్ ఫోనుకు మెసేజ్ ద్వారా సందేశాలు పంపించే ఏర్పాటు చేయాలనీ విద్యుత్ నియంత్రణ మండలి వారిని ప్రార్థిస్తున్నాము. ఫిర్యాదును టోల్ ఫ్రీ నెంబర్ లో ఆటోమేటిక్ గా కాకుండా ఆపరేటర్ ద్వారా తీసుకోవాలి. వ్యవసాయదారులకు ఆటోమేటిక్ ద్వారా కంప్లెంట్ లు చేయడం సాధ్యం కావడం లేదు.</p> <p>సంభాషణలు రికార్డు అయ్యే ఏర్పాటు చేయాలి.</p> <p>గ్రామీన ప్రాంతాలలో గృహ మరియు ఇతర వినియోగదారుల కొరకు పట్టణాలలో మాదిరిగా విద్యుత్ సరఫరా చేయాలి. గ్రామీన ప్రాంత ప్రజలను రెండవ తరగతి ప్రజలను చూడరాదు.</p>	
9	<p>మాతృబాష అమలు: మాతృబాష అమలుకు తగిన చొరవ చూపించాలి.</p>	<p>ఎ.ఆర్.ఆర్.(ARR) యొక్క సంక్షిప్త నివేదికను తెలుగులో ఇవ్వబడుచున్నది మరియు అట్టి నివేదికను కంపెనీ వారి official website నందు కూడా పొందుపరచబడినది</p>
10	<p>దిస్కం వారు సరఫరా చేసే ARR లు ఇతరలు మరియు విద్యుత్ నియంత్రణ మండలి వారు ఇచ్చే టరిఫ్స్ ఆర్డర్ ను కూడా తెలుగులో ముద్రించి ఇవ్వాలని గతంలో కూడా తమరికి విన్నవిస్తున్నాము. వెంటనే అమలుకు తగిన చొరవ చెర్యలు తీసుకోవాలని విద్యుత్</p>	

	నియంత్రణ మండలిని ప్రార్థిస్తున్నాం	
11	విద్యుత్ ఉపకరణాలు, పంపిణీ సంస్థలు సరఫరా చేసేటివి వ్యవసాయానికి మరియు ఇతరములు వేర్వేరు రంగులు కొనుగోలు చేయాలి. వేనియోగాదరునికి సరఫరా చేసిన తర్వాత వినియోగ దారుని సంతకం తన సర్వీసు వద్ద ఏ మొటిరియల్ ఎంత వాడారు అని వినియోగ ద్రువికరణ పత్రం (Utilization Certificate from Consumer) తీసుకోవాలి. Interpolls, System Improvement సంబంధించిన మొటిరియల్ ఏకావగా దుర్వినియోగం అవుతుంది. దాని వలన సంస్థ మరియు వినియోగదారులు నష్టపోవడం జరుగుతుంది.	TSSPDCL వారు వివిధ అవసరముల కొరకు మెటీరియల్ ను మొత్తంగా (consolidated basis) కొనుగోలు చేయుచున్నారు. వ్యవసాయ సర్వీస్ లను రిలీజ్ చేయడం కోసం వాడిన మెటీరియల్ ను TSSPDCL యొక్క క్వాలిటీ కంట్రోల్ విభాగపు అధికారులు మరియు మూడవ పార్టీ వారు (ASCI). పని జరుగుతున్న సమయాలలో మరియు పూర్తి అయిన తరువాత అనగా (M-బుక్) లో నమోదు అయిన తరువాత తనిఖీ చేయడం జరుగుతున్నది. తనిఖీ సమయంలో, మెటీరియల్ వాడకంలో, పని చేయడంలో ఏవైనా వ్యత్యాసము అనిపించినచో సంబంధిత అధికారిపై వెంటనే డిసిప్లినరీ చర్య తీసుకోనుచూ మెటీరియల్ దుర్వినియోగం చేసిన మొత్తాన్ని రికవర్ చేస్తారు.
12	సామూహిక (Community) అవసరాల కొరకు వాడిని సమగ్రి కొరకు కనీసం ఆ ప్రాంత వినియోగదారులు ముగ్గురు సంతకం తీసుకున్నా తర్వాత పని ముగిసినట్లు బావించాలి. పొడరదర్శకం పనులు జరిగే ఇర్పతుకు తగ్గు చెర్యలు గైకోనాలి తమరిని వినమ్రంగా ప్రార్థిస్తునం.	మెటీరియల్ వాడకంలో, పని జరగడంలో పారదర్శకతను చూపడం జరుగుతున్నది మరియు దీనిని SAP సిస్టం ద్వారా మానిటర్ చేయడం జరుగుతున్నది. SAP సిస్టం ద్వారా ఎస్టిమేట్ లో పేర్కొనబడిన మెటీరియల్ ను వాడిన మెటీరియల్ తో పోల్చి చూస్తారు. ఏదైనా వ్యత్యాసము కనబడితే, సంబంధిత అధికారిపై సరైన చర్య తీసుకొనబడును.
13	చెక్కర మిల్లులు విద్యుత్ ఉత్పత్తికి దూరంగా ఉంటున్నాయి. వారికీ తగిన రేట్ ఇచ్చి విద్యుత్ ఉత్పత్తికి ప్రోత్సయించాలి. రాటు ప్రస్తుత కొనుగోలు దారాలతో దాదాపు సరిపోయేటట్లు నిర్ణయించి కొనుగోలు చేయాలి. ఎన్ని చెక్కర మిల్లుల వద్ద ఎంత విద్యుత్ కొనుగోలు	గౌరవనీయ కమిషన్ వారు ప్రస్తుతం ఉన్నడిమాండ్ ఆధారంగా ఏడాది కాలంలో చెరుకు పిప్పి ద్వారా విద్యుత్ ఉత్పత్తి ప్రోత్సాహం గుర్తిస్తుంది. 22-06-2013 తేదిన కమిషన్ ఆర్డర్ లో మొదటి 10 సంవత్సరాలు ఉన్న విద్యుత్ ఫ్లాంట్లకు స్థిర వ్యయం

	<p>చేస్తున్నారు. ఏ ధరకు కొంటున్నారు, భావిష్యతులో కొనుగోలుకు ఇంకా అవకాశం ఎంత ఉంది? దిస్కం ద్వారా వివరాలు తెలుపమని, తదుపరి కొనుగోలు కొరకై తగిన చెర్యలు గైకోనగాలరని ప్రార్థిస్తునం</p>	<p>నిర్ణయించింది. కమిషన్ ఆర్డర్ O.P.No.32/2014 తేదీ 16.05.2014 వరుసగా Rs.2.73, 2.89, 3.06, 3.25 మరియు 3.44 గా FY2014-15 నుండి FY2018-19 కాలానికి చెరుకు పిప్పి విద్యుత్ ప్రాజెక్టులకు వేరియబుల్ ఖర్చు నిర్ణయించింది. కమిషన్ కూడా 6% ఇంధన ధర adjustment అందించింది. ప్రస్తుతం TSSPDCLలో. చెరుకు పిప్పి ఆధారిత విద్యుత్ ప్రాజెక్టు M/s గణపతి షుగర్ ఇండస్ట్రీస్ లిమిటెడ్ పేరుతో ఇప్పటికే 15 మెగావాట్ల విద్యుత్ సరఫరా చేయగలుగుతోంది. TSSPDCL లో చెరుకు పిప్పి ఆధారిత విద్యుత్ ప్రాజెక్టులు ఏర్పాటుకు కొత్త ప్రతిపాదనలు రాలేదు. TSSPDCL ఏదేని నూతన ప్రాజెక్టులకు PPA's ఎంటర్ను సిద్ధంగా ఉన్నారు.</p>
14	<p>స్వల్పకాలిక విద్యుత్ కొనుగోలు వల్ల వినియోగదారులపై ఎక్కువ బారం పడుతుంది. దీర్ఘకాలిక కొనుగోలు ఒప్పందం వల్ల బరం తగ్గుతుంది కావున స్వల్పకాలిక ఒప్పందాల కొనుగోలుకు 5% కన్నా మించకుండా ఉండేటట్లుగా తగిన చెర్యలు గైకోనలని ప్రార్థిస్తునం.</p>	<p>2000 మెగావాట్ల విద్యుత్ కొనుగోలుకు Aug'10 లో దీర్ఘకాలిక కొనుగోలు ఒప్పందం కాలపరిమితి ఇరవై ఐదు సంవత్సరాలకు విద్యుత్ టెండర్ పిలవడము జరిగింది. అందులో 500 మెగావాట్ల క్వాంటంకు M/s థర్మల్ Powertech కార్పొరేషన్ భారతదేశం లిమిటెడ్ వారితో అగ్రీమెంట్ చెయ్యబడింది. 300 మెగావాట్లు మరియు 250 మెగావాట్లకు గాను M/s కృష్ణపట్నం పవర్ కార్పొరేషన్ లిమిటెడ్: మరియు M/s.PTC భారతదేశం లిమిటెడ్ (M/s.East కోస్ట్ ఎనర్జీ ప్రైవేటు లిమిటెడ్ మూలం).LOI జారీ చేయడము జరిగింది.ఈ రెండు కంపనీలు హైకోర్టు వారిని GOI ద్వారా జారీ ఏనే ప్రామాణిక బిడ్డింగ్ మార్గదర్శకాల darft PPA లో కొన్ని మార్పులు అభ్యర్థిస్తోంది ఆస్రయించారు. కేసులు గౌరవనీయ</p>

		<p>హైకోర్టు వద్ద పెండింగ్లో ఉన్నాయి.</p> <p>మూడు సంవత్సరాల కాలానికి జూన్'13 నుంచి జూన్'16 వరకు 2000 మెగావాట్ల విద్యుత్ కొనుగోలుకు Nov'11 లో మీడియం టర్మ్ టెండరను ఆహ్వానించాడము జరిగినది.</p> <p>400 మెగావాట్లు, 480 మెగావాట్ల కు గాను M/s. KSK మహానది పవర్ కంపెనీ లిమిటెడ్ మరియు M/s Corproate పవర్ లిమిటెడ్ (తరువాత PPA 150 మెగావాట్లకు సవరించారు) వారితో PPA సంతకము చేయడము జరిగినది.</p> <p>M/s. KSK మహానది పవర్ కంపెనీ లిమిటెడ్ Aug'13 నుండి డిస్కాంకు విద్యుత్ సరఫరా ప్రారంభమైంది.</p> <p>M/s. కార్పొరేట్ పవర్ లిమిటెడ్ డిస్కాం కు విద్యుత్ సరఫరాకు బదులుగా సిటీ సివిల్ కోర్టు Liquidated Damages గురించి అశ్రీకాంచారు. డిస్కాం సిటీ సివిల్ కోర్టు జారీచేసిన ఉత్తర్వులను వ్యతిరేకంగా గౌరవనీయ హైకోర్టు ముందు అప్పీల్ దాఖలు చేయడము జరిగింది. కేసు పెండింగ్లో ఉంది.</p> <p>G.O.Ms.నం.29, Dt.08.10.2014 ప్రకారం, 2000 మెగావాట్ల దీర్ఘకాలిక విద్యుత్ కొనుగోలుకు కాలపరిమితి 7 సంవత్సరాలకు DBFOO క్రింద విద్యుత్ టెండర్ ప్రక్రియ కొనసాగుచున్నది</p> <p>అదనంగా 2000 మెగావాట్ల విద్యుత్ చత్తీస్గఢ్ జెన్కో ఫ్లాంట్ నుండి తీసుకొనుటకు ప్రణాళిక ఉంది. ఇప్పటికే 1000 మెగావాట్ల కు గాను చత్తీస్గఢ్ జెన్కో ఫ్లాంట్ తో MOU సంతకం చేయడము జరిగిన</p>
--	--	--

		<p><u>జెన్కో ప్రణాళికలు:</u></p> <p>జెన్కో ప్రణాళిక (Thermal) ఇలా చేశారు</p> <p>KTPP దశ-II - 600 మెగావాట్ల</p> <p>KTPS స్టేజ్ VII - 800 మెగావాట్ల</p> <p>Manuguru 1080 మెగావాట్ల</p> <p>Damaracherla 1200 మెగావాట్ల</p> <p>Damarcherla B 3200 మెగావాట్ల</p> <p>KTPS వేదిక -VII - 800 మెగావాట్ల</p> <p>అదనంగా హైడల్ మూలాల నుండి 250 మెగావాట్ల పొందనున్నారు. బొగ్గు కొరత కారణంగా తక్కువ PLFs ఇష్యూ సృష్టత కోసం అన్ని వేదికలపై కాల్ ఇండియా వారితో కలసి చేపట్టడం జరిగింది</p>
15	<p>సి.జి.అర్.ఎఫ్. కన్స్ట్రూమర్ నెంబర్ ఒకరు, ముగ్గురు దిస్కం అధికారులుగా ఉంటున్నారు. చాలా సందర్భాలలో దిస్కంలకు లాబం చేయడానికి వినియోగదారునికి అన్యాయం చేయడం జరుగుతుంది. కావున దిస్కం అధికారుల ప్రభావం తగ్గి వినియోగదారునికి న్యాయం చైక్యూదనికై ఒక జుడిచిఅల్ మేమ్బెర్ను ఒక వేనియోగాదరుని సబ్యుని ఇద్దరిని దిస్కం అధికారాలను నియమించాలని కోరుచున్నాము.</p>	<p>ఫోరమ్ చైర్మన్ తో సహా నలుగురు సభ్యులు ఉంటారు. లైసెన్స్ చైర్మన్ మరియు ఫోరం సభ్యులు ఇద్దరిని నియమించలి మరియు కమిషన్ ఒక స్వతంత్ర సభ్యుడిని నామినేట్ చేస్తారు..</p>
16	<p>మహబూబ్ నగర్ జిల్లా కోల్లాపూర్ వాసి మద్దిరేటి దిస్కం సేవలోపం పైన తగిన చెర్యలు</p>	<p>మీ సూచనలను పరిగణనలోకి తీసుకోబడును</p>

	<p>తీసుకోవాలని సి.జి.అర్.ఎఫ్.ను అశ్రాయించారు. సి.జి.అర్.ఎఫ్. వారు సేవలోపం జరిగింది. మద్దరేట్ కి సేవలోపం క్రింద రూ. 1,50,000/- లు చెల్లించదని తీర్పు ఇస్తే సిబంది అడిగితే స్త్రానిక నాయకులను ఆశ్రయించి ఆ రైతు పై ఒతిడి తీసుకు వచ్చి అతి కొద్ది మొత్తం నగదు ఇచ్చి మొత్తం డబ్బులు ముట్టినది అని రాసిడు తెచ్చాడు. కరీంనగర్ జిల్లాలో సి.జి.అర్.ఎఫ్. వారు వేసిన పెనాల్టీ నాకు అవసరం లేదని వ్రాయించుకోవారు. ఇటువంటి అక్రమాలు జగకుండా అట్టి అపరాధ రుసుమును సి.జి.అర్.ఎఫ్. ద్వారా వినియోగదారునికి చెక్ రూపంలోనే ఇపించే ఇర్పాటు చేయాలనీ ప్రార్థిస్తున్నాము</p>	
17	<p>సి.జి.అర్.ఎఫ్. పైన వినియోగదారుla అవగాహనా లేదు. దిని గురించి ప్రచారము సరిగా లేదు. ప్రతి బిల్ వెనుక తెలుగులో సి.జి.అర్.ఎఫ్. సౌకర్యము సేవలు గురించి ప్రచురించాలి</p>	<p>మీ సలహా పరిశీలించబడును</p>
18	<p>మెదక్ జిల్లాలో.....గ్రామం.....మండలంcommunity బావులకు సంబంధించి సర్వీసు ఛార్జ్ తిస్సుకేలరు. అని పలుమార్లు బిల్ వసూళ్ళకు వచ్చిన సిబందికి తెలిపాడు. అయిన అతనికి సంబంధించి గృహ విద్యుత్ connection తొలగించారు. 20 సంవత్సాల నుండి ఉపయోగంలో లేని కనీసం లైన్ కూడా లేని దానికి బిల్లు వాసులు చేస్తున్నారు.</p>	<p>ఇచ్చిన సమాచారం సరిపడినంత లేదు. వివరణాత్మక సమాచారాన్ని అందించగలరు.</p>
20	<p>నల్గొండ జిల్లాలో సి.జి.అర్.ఎఫ్. వారి వద్దకు ఒక వేనియోగాదరుడు వచ్చి నా స్వంత ప్లాట్ (రెసిడెన్షియల్) లో డి.టి.అర్. వేసారు. దానిని తియించడానికి కోర్ట్ కు వెళ్లి డిక్రీ తీసుకు</p>	<p>విచారణ జరిపించి పూర్తిగా పరిశీలించిన తరువాత తగు చర్య తీసుకోబడును</p>

	<p>వచ్చాను. దానిని దిస్కం వారు ఇంఫ్లిమెంట్ చేయలేదు. డిక్రీని ఇంఫ్లిమెంట్ చేయాలనీ సి.జి.అర్.ఎఫ్. వద్దకు వస్తే సి.జి.అర్.ఎఫ్. వారు కూడా దిక్రీని అమలు చేయాలనీ ఆర్డర్ ఇచ్చారు. అయిన అమలు చేయలేదు. సంబంధిత వినియోగదారుడు కాంట్రాక్టర్ కు రూ. 20,000/- ఇచ్చి పనిచేయిస్తున్నారారు. ఇటువంటి తప్పులకు బాధ్యతా రాహిత్యానికి ఎవరిని బాధ్యులు చేయాలి? ఎలాంటి చర్యలు తీసుకోవాలో తెలపాలి. టి.ఎస్.ఇ.అర్.సి. వారు స్వస్థంగా కఠిన చెర్యలు కొరకు ఉపక్రమించాలి.</p>	
21	<p>పట్టణాలలో అపార్ట్మెంట్లలో కామన్ మీటర్ కు సంబంధించి వినియోగదారులు ఎక్కువ మంది ఉంటారు. ఒక అపార్ట్మెంట్ లో 20 ఫ్లాట్స్ ఉంటే మీటర్ రీడింగ్ వినియోగం ఏంత ఉంటే అంతలో 20 బాగాలుగా వాడుకున్నట్లు అవుతుంది. కానీ రీడింగ్ నమోదు 20 మందికి ఒకే చోట వేనియోగం రికార్డు అవుతుంది. కావున ఎక్కువ ఫ్లోలోకి వెళ్తుంది. దానికి అంత ఏక్కువ అతి రేట్ వర్తిస్తుంది. ఇది బారంగా ఉంటుంది. నిటి వినియోగం విషయంలో అపార్ట్ మెంట్ లకు వేరే తరిఫ్ఫ్ ఉంది. అన్ని పట్టణాల్లో మద్య తరగతి ప్రజలకు బరం ఉండకుండా దానికి ప్రత్యేకమైన తరిఫ్ఫ్ లు అమలు చేయాలిని ప్రార్థిస్తునం.</p>	గౌరవ కమీషన్ వారి పరిధిలో కలదు
22	<p>నర్సరి విషయంలో రూరల్ హార్డి కల్చర్ నర్సరి అని పదం ఆంధ్ర లబిఎస్టులు చేర్చించినారు. హైదరాబాద్ పరిసరాల్లో ఉండే నర్సరిలకు వర్తన్యాకుడదని ఇట్టి కుట్ర చేసినవారు. దాని హార్డి కల్చర్ నర్సరి అని మార్చాలి. రూరల్ అనే పదం తీసివేయాలని ప్రదిస్తునము.</p>	గౌరవ కమీషన్ వారి పరిధిలో కలదు

23	<p>మంచినీటి శ్రుతి మరియు సరపరా category -3 నుండి category - 2 కు ఇ.అర్.సి. అనుమతి తిస్కోవడానికి దిస్కుంలు మార్పారు. ప్రతి ప్రాణి గాలి తర్వాత అవసరమైన నిటి విషయంలో catogory కి march త్రాగునీటి బరం పెంచడం, దానికి సబ్సిడీ రేట్ నిర్ణయించాలని ప్రదిస్తునాను.</p>	<p>కమీషన్ వారు ఆమోదించిన టారిఫ్ ఆర్డర్ నందు పేర్కొనబడిన ఎల్.టి.III కేటగిరి నిర్వచనం ప్రకారం R.O.ఫ్లాంట్స్ ఎల్.టి.-III కేటగిరి నందు పరిగనించబడదు మరియు ఇది ఏ ఇతర కేటగిరి లకు సంబంధించినది కాకపోవడం వలన ఎల్.టి.-II కేటగిరిగా పరిగనించబడుతున్నది. అయినప్పటికీని, కేటగిరి నిర్ణయించు అంశం గౌరవనీయ కమీషన్ వారి పరిధిలో కలదు.</p>
24	<p>స్తానికంగా ఉన్న కాంట్రాక్టర్లు, హేల్పర్లు/ గిల్పర్లు ఏడిపోయిన బావులు వద్ద నుండి కండక్టర్ ను పోలీస్ ను సేకరించి అవసరాల కొరకు వచ్చిన వినియోగదారులకు అమ్ముకుస్తున్నారు. దీనిని ప్రజలు గుర్తించి కంప్లైంట్స్ చేస్తే (దొంగతనం జరిగినట్లు పోలీస్ కంప్లైంట్లు చేసిన) ఉన్నతాదికారులు వారికి వత్తాసు పది కాపాడుతున్నారు. అగ్రికల్చరల్ కనెక్షన్ ల కొరకు డి.డి.లు కడతామని హేల్పర్లు/గిల్పర్లు డబ్బు రూపైనా లేదా డి.డి. రూపైనా తీసుకోని దిస్కుం ఆఫీసు ల లో జమ చేయక సంవస్తరాల తరబడి వారి వద్దనే ఉంచుకొని వినియోగదారులను మబ్యాపెడుతున్నారు. దీనిని నియంత్రించాలి</p>	<p>ఒకసారి లైన్ కానీ ట్రాన్స్మార్మర్ కానీ వేసిన తరువాత ఎవరైన వాటిని డిపార్టుమెంటు అనుమతి లేకుండా తొలగించుటకు వీలులేదు. ఇటువంటి సంఘటనలు డిపార్టుమెంటు దృష్టికి వస్తే చట్టరీత్యా తగు చర్యలు తీసుకోవబడును. డిపార్టుమెంటు వ్యక్తులకు ఎట్టి పరిస్థితులలో డబ్బు రూపేణ ఇవ్వరాదు. కేవలం DD రూపంలో తగినంత రుసుము చెల్లించి సంబంధిత వినియోగదారుల సేవ కేంద్రంలో చెల్లించి రసీదు పొందవలెను. ఈ విషయం గురించి వినియోగదారులలో అవగాహన గురించి విస్తృత ప్రచారం చేయుట జరుగుతుంది.</p>

S.No	Summary of Objections / Suggestions	Response of the Licensee
	<p>127. P. Vydehi, Secretary (I/c), Federation of Telangana and AP chambers of Commerce and Industry, #11-6-841, Federation house, Redhills, Hyderabad,500004 128. Telanagana Textiles and Spinning Mills Association, Surya Towers, First Floor, Sardar Patel Road, Secunderabad-500003, Telangana State- Phone No.9849028556</p>	
1	<p>3 NON ADHERENCE TO MYT PRINCIPLES</p> <p>.....Subsequently, for the third control period, the Hon'ble Commission has again granted permission to the distribution licensees to file ARR and Tariff on single year basis.</p> <p>It may be true that the Hon'ble Commission may have powers to relax any provision of the Tariff Regulations. However, the very purpose of introducing the Multi Year Tariff Regulatory Framework is to bring certainty and predictability as stated in the Tariff Policy:</p> <p>“8.1 Implementation of Multi-Year Tariff (MYT) framework</p> <p><i>1) This would minimise risks for utilities and consumers, promote efficiency and appropriate reduction of system losses and attract investments and would also bring greater predictability to consumer tariffs on the whole by restricting tariff adjustments to known indicators on power purchase prices and inflation indices. The framework should be applied for both public and private utilities. (Emphasis Supplied)</i></p> <p>Hence, the Petition is opposed to the Tariff Regulations and the Tariff Policy and is liable to be rejected, <i>in limine</i>.</p>	<p>TSSPDCL has been following the MYT scheme for distribution business for the 1st Control period i.e. 2006-07 to 2008-09, 2nd Control period i.e. 2009-10 to 2013-14 and also for 3rd control period as per clause-6 of the Regulation 4 of 2005. The distribution Licensee could not file the ARR for retail supply business for the entire control period due to significant uncertainty prevalent on the availability of energy and the cost of power purchase for 3rd Control period. There was uncertainty in commissioning dates of the GENCO Stations, central generating stations, and other generating stations.</p> <p>Hon State Commission by its order dated 15.12.2014 has granted permission for the TS discoms to file ARR annually for the FY 2015-16 as per the terms of its conduct of business regulations.</p> <p>It is pertinent to mention here that the Hon APTEL in Appeal No.126 & 159 of 2012 filed by AP Ferro Alloys association against the APERC tariff Order for FY 2012, upheld the decision of the Hon Commission vide its order dated 04th September 2013 at para 17 of the order and the same is produced below: <i>“Admittedly, as per the Regulations, the State Commission has powers to allow the filing of ARR/tariff proposal for retail supply business on</i></p>

DANGER OF TRANSGRESSING MYT: If the MYT principles can be transgressed and overlooked in the case of the Petitioner, it sets a very wrong precedent, as every licensee also may seek revision of tariff within the prescribed control period.

In fact, addressing such a situation, the Hon'ble APTEL passed a landmark judgement in the case of **JAIPUR VIDYUT VITRAN NIGAM LTD. AND OTHERS VS. KALPATARU POWER TRANSMISSION LTD. AND OTHERS 2012 ELR (1238)**. The operative portion of the Judgement is reproduced herein for ready reference:

“23. According to Ld. Counsel for the Appellants, the State Commission ought to have determined the tariff for the power plant of the Respondent no. 1. We are not able to accept this contention. Section 61 of the Act states that the Appropriate Commission, for determining the terms and conditions for determination of tariff, shall be guided inter-alia, by multi-year tariff principles. The Tariff Policy also envisages that the MYT framework should feature a five year control period. Accordingly, the State Commission has specified the Tariff Regulations, 2009 for the MYT control period 2009-14 for regulatory certainty and clarity. The State Commission has already specified the generic tariff for the existing biomass plants for the MYT period 2009-14 through its Regulations. Therefore, the State Commission cannot determine the project specific tariff for the existing power plant of the Respondent no. 1 in contravention to its Tariff Regulations.”

Thus, transgressing MYT Principles would lead to opening up of a Pandora box for the other licensees and like stakeholders in the other sectors to reopen and revisit the concluded contracts.

annual basis and the State Commission has exercised its power after considering the reasons given by the Distribution Licensees and passed reasoned order granting the permission which is perfectly legal”.

4 TRUING UP OF ARR FOR SECOND CONTROL PERIOD

The Objector submits that the second control period encompassing the FY 2009-10 to 2013-14 has ended. The erstwhile Regulatory Commission in the Tariff Order for FY 2013-14 had stated that it *“will take up true-up mechanism after the completion of the control period as envisaged in the relevant regulations”*.

A truing up exercise should be held on a regular yearly basis as held in a catena of judgments of the Hon’ble APTEL including:

- OP No. 1 of 2011;
- Appeal No. 77, 78 & 79 of 2006 in the matter of NEESCO Vs OERC; and
- Appeal No. 121 of 2010 dated 21st October, 2011.

In view of the above, the Objector submits that truing up has to be undertaken for all the years of the second control period as per the strict provisions of the Tariff Regulations and necessary adjustment may be passed along with the ARR and Tariff Order for FY 2015-16.

Based on the above submissions and in view of the stand taken by the erstwhile Regulatory Commission previously, the Objector prays to the Hon’ble Commission to true-up the ARR pertaining to retail –supply business for all the years of the second control period as per the strict provisions of the Tariff Regulations and necessary adjustment may be passed along with the ARR and Tariff Order for FY 2015-1

The Gains/losses up to the Year 2012-13 is covered under the FRP Scheme. The retail true up of the FY 2013-14 is claimed in these filings.

As per the amended regulation 4 of 2005, TSSPDCL has also claimed True up for the FY 2014-15.

5 ORDER ON GENERATION TARIFFS IS STILL PENDING

Power Purchase Cost constitutes around 80% of the total ARR out of which cost of power from state owned sources constitutes around 45%. The Order on Generation tariffs for FY 2014-15 to 2018-19, based on the Generation Tariff Regulations is yet to be passed by the Hon'ble Commission. The TSGENCO and APGENCO may be directly to file the petition for the FY 2014-19 period in a time bound manner and the same may be finalised by the Hon'ble Commission expeditiously.

Till the time the generation tariffs are not finalised for TSGENCO and APGENCO stations:

- No escalation in variable costs should be allowed in the power purchase cost from such stations.
- 20% of the fixed charges should be disallowed due to reasons detailed in the succeeding paragraphs.

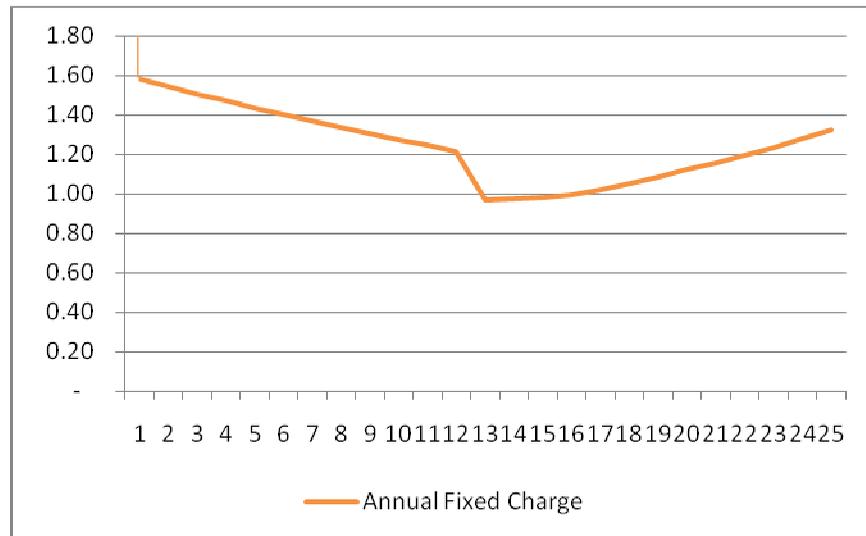
The fixed costs for a power station in cost plus tariff models typically fall year on year in the initial years. This is because the return on capital employed (interest on long term loan) would fall year on year as long term loan gets repaid. After the loan is fully repaid, there is a marked drop in the fixed charges as the interest liability becomes nil and depreciation expense also falls. The depreciation rate is higher in the initial years to match the cash outflow required for loan repayments. After the loan is fully repaid, the depreciation rate falls such that balance depreciation is amortised over the balance useful life of the asset.

Subsequently, the tariff remains flat and there is a slight increase only on account of the increase in the O&M expenses due to escalation index. The typical fixed charges over the power project life cycle are depicted in the graph below:

Keeping in view of the increase in cost of coal, increase in rail freight and diesel charges, TSSPDCL considered a conservative estimate of 2% escalation in the variable cost.

Issuing of Generation Tariff Order is not in the Purview of the Licensee

Graph: Typical Annual Fixed Charges in a Cost Plus Model



Thus, the fixed charges have to decrease on a year to year basis. By not approving the Tariff Order for FY 2014-19 control period, the Commission has allowed the Generating Companies to charge higher fixed charges than they would be been entitled to.

	<p style="text-align: center;">6 SHARING OF GAINS AND LOSSES ON VARIATIONS IN “CONTROLLABLE” ITEMS OF ARR</p> <p>Regulation 10.6 of the Tariff Regulations provides that <i>“the Distribution Licensee in its annual filings during the Control Period shall present gains and losses for each controllable item of the Aggregate Revenue Requirement. A statement of gain and loss against each controllable item will be presented after adjusting for any variations on account of uncontrollable factors”</i>.</p> <p>It is submitted that the Licensee has not provided such statement which was required by the Tariff Regulations.</p> <p>It is prayed that the Hon’ble Commission may direct the Licensee to submit such statement and opportunity may be provided to the Objector / consumers to provide comments on such submissions. Further it is submitted that the deviations should be approved and gains and losses should be shared with the consumers on a yearly basis.</p>	<p>The 10.7 of the Regulation 4 of 2005 reads as under <i>“For the purpose of sharing gains and losses with the consumers, only aggregate gains or losses for the Control Period as a whole will be considered. The Commission will review the gains and losses for each item of the ARR and make appropriate adjustments wherever required: Provided that for the first Control Period, insofar as the gains and losses from the Retail Supply Business of the Distribution Licensee are concerned, these will be shared with the consumers on yearly basis”</i></p> <p>Accordingly, DISCOM has furnished the information related to deviation in the controllable items in the ARR for the second control period along with detailed reasons.</p>
	<p style="text-align: center;">7 COST TO SERVE METHODOLOGY</p> <p>With regard to the cost of serve methodology, the Petitioner has proposed the following:</p> <p style="padding-left: 40px;"><i>“The Hon’ble commission has been adopting Embedded Cost of Service method for determining the category wise CoS and Tariff. In determination of category wise Tariff for FY 2015-16, the licensee observed that Cost of Service of a category under existing Embedded CoS</i></p>	<p>Licensee has calculated CoS based on embedded CoS method only.</p> <p>However, Hon’ble Commission was requested to adopt average cost of supply as per the NTP while fixation of tariffs for each category. As Clause 8.3.2 of National Tariff Policy states that <i>“For achieving the objective that the tariff progressively reflects the cost of supply of electricity, the</i></p>

method and with $\pm 20\%$ is not commensurate with the proposed tariffs of certain categories. The licensee did not face this issue in the previous years as there were no major tariff revisions proposed by the Licensee.

Hence, for the year 2015-16, the licensee would like to propose tariff increase and humbly requests the Hon'ble Commission to adopt average cost of supply as per the NTP while fixation of tariffs for each category.

Clause 8.3.2 of National Tariff Policy states that "For achieving the objective that the tariff progressively reflects the cost of supply of electricity, the SERC would notify roadmap within six months with a target that latest by the end of year 2010-2011 tariffs are within $\pm 20\%$ of the average cost of supply. The road map would also have intermediate milestones, based on the approach of a gradual reduction in cross subsidy."

Licensee has put all efforts while proposing tariffs to be within $\pm 20\%$ of the average cost of supply wherever it is possible.

In case, If the Hon'ble Commission determines the tariff based on Category wise CoS, then the licensee humbly requests the Hon'ble Commission not to determine the tariffs based on "CoS Plus or Minus 20%" limit as the clause 8.3.2 of National Tariff Policy (NTP) refers to average CoS not category wise CoS."

From a plain analysis of the above proposal, the following express and implied prayers of the Petitioner can be deciphered:

- Departure from the Embedded CoS method for calculating CoS of a category;
- The tariff proposals made by the licensee is not commensurate with the "CoS $\pm 20\%$ limit" which refers to the issue of cross-subsidy.
- Proposal to the Hon'ble Commission to determine the tariff based on

SERC would notify roadmap within six months with a target that latest by the end of year 2010-2011 tariffs are within $\pm 20\%$ of the average cost of supply. The road map would also have intermediate milestones, based on the approach of a gradual reduction in cross subsidy"

Licensee has put all efforts while proposing tariffs to be within $\pm 20\%$ of the average cost of supply wherever it is possible.

average CoS and not category wise CoS.

The merits and admissibility of each of these implied and express prayers are dealt in detail in the succeeding paragraphs.

The erstwhile Regulatory Commission in its Tariff Order for FY 2012-13 at Paragraph 81 had provided its observation on the Embedded CoS methodology for computing CoS. The same is reproduced below:

“The Licensees’ reference to average cost in support of raise in tariff is not acceptable. The Commission, in this Tariff Order, has computed the embedded cost following the traditional practice of the Commission which tallies with the suggestion of the objector. However, computing the cost of service for each consumer category separately based on embedded cost model is data intensive and such data is not readily available. However, the cost of service for major consumer categories in HT-I(A): (Industry General) and HT-II: (Others) have been computed for three voltages, (a) 11 kV, (b) 33 kV and (c) 132 kV and above FY 2012-13.”

In view of the above observations of the erstwhile Regulatory Commission, it is prayed that the traditional approach of calculating CoS through embedded cost methodology may be continued, rather than permitting the Licensee of introducing a new methodology.

Following are the tests for deciding the tariff in compliance of the Electricity Act, 2003 Tariff Policy and Regulations of the Commission:

- The Cost of service for each category of consumer will have to be worked out separately.
- The cross subsidy should be going down from year to year.
- Tariff need not be a mirror image of cost to supply to the respective consumer categories.

	<ul style="list-style-type: none"> • Tariff for different categories of consumers are differentiated only according to the factors give in Section 62(3). • There should be no tariff shock to any category of consumer. 	
	<p>8 CROSS SUBSIDY</p> <p>There is no mention of the definition of the term 'cross subsidy' anywhere in the Tariff Policy, National Electricity Policy or in the Electricity Act, 2003. Section 61(g) of the Electricity Act, 2003 provides that the tariff should progressively reflect the cost of supply of electricity and cross subsidies should be reduced in the manner specified by State Commission. This shows that there is a mandate that tariff should progressively reflect actual cost of supply for each consumer category and not average cost of supply.</p> <p>Clause 8.3 of the Tariff Policy provides:</p> <p><i>“8.3 Tariff Design: Linkage of tariffs to cost of service</i></p> <p><i>It has been widely recognised that rational and economic pricing of electricity can be one of the major tools for energy conservation and sustainable use of ground water resources.</i></p> <p><i>In terms of the Section 61 (g) of the Act, the Appropriate Commission shall be guided by the objective that the tariff progressively reflects the efficient and prudent cost of supply of electricity.</i></p> <p>....</p> <p><i>Accordingly, the following principles would be adopted:</i></p> <p>1.....</p> <p>2. <i>For achieving the objective that the tariff progressively reflects the cost</i></p>	<p>With regard to the comparison of CoS w.r.t. the Tariff, it is to inform that the the tariff need not be the mirror image of actual cost of supply or voltage-wise cost of supply.</p> <p>The Hon Tribunal in various appeals held as under “ However, we are not suggesting that the tariffs should have been fixed as mirror image of actual cost of supply or voltage-wise cost of supply or that the cross subsidy with respect to voltage-wise cost of supply should have been within ±20% of the cost of supply at the respective voltage of supply.</p> <p>The legislature by amending Section 61(g) of the Electricity Act by Act 26 of 2007 by substituting ‘eliminating cross subsidies’ has expressed its intent that cross subsidies may not be eliminated.</p>

of supply of electricity, the SERC would notify roadmap within six months with a target that latest by the end of year 2010-11, tariffs are within $\pm 20\%$ of the average cost of supply. The road map would also have intermediate milestones, based on the approach of a gradual reduction in cross subsidy.

For example, if the average cost of service is Rs. 3 per unit, at the end of the Year 2010-11, the tariff for the cross subsidised categories excluding those referred to in Para 1 above should not be lower than Rs. 2.40 per unit and that for any of the cross-subsidising categories should not go beyond Rs. 3.60 per unit.”

Thus, the Tariff Policy requires a State Commission to fix such tariffs, that it progressively reflects the cost of supply and to ensure that latest by the year 2010-11, the tariff for each category of consumers is within $\pm 20\%$ of the average cost of supply. Section 61 (g) of the Electricity Act, 2003 mandates the Commission to ensure, that the tariff progressively reflects the cost of supply and also reduces the cross subsidies. Thus, the Tariff Policy read with Section 61(g) of the Act, clearly provides that the State Commission is required to ensure that the cross subsidies are to be progressively reduced and to ensure that tariff for each category is within $\pm 20\%$ of the overall average cost of supply latest by the year 2010-11.

The Tariff Policy, thus, recognises the fact that one of the objectives is that the tariff should reflect the cost of supply and for achieving that objective, the State Commission should notify roadmap within six months with a target that latest by 2010-11 tariff are within $\pm 20\%$ of average cost of supply (overall average cost of supply). However, nowhere, the Tariff Policy suggests that the cross subsidy has to be calculated based on average cost of supply. On the other hand, it provides that the tariff progressively should reflect cost of supply.

Section 61(g) of the Act of 2003 envisages a gradual transition from the tariff

loaded with cross subsidies to a tariff reflective of cost of supply to various class and categories of consumers. Section 61(g) of the Electricity Act 2003, requires the State Commission to specify the period within which cross subsidy would be reduced and eliminated so that the tariff progressively reflects the cost of supply of electricity. Thus, roadmap for reduction and elimination of cross subsidy has to be notified by the Hon'ble Commission.

It can be seen from the above tables, that the Licensee has markedly deviated from the claim of trying to design tariff within the $\pm 20\%$ range of the average cost of supply. The non domestic (commercial) and HT industrial tariffs are significantly over 120% of the average cost of supply. As per the provisions of the Electricity Act and Tariff Policy, the subsidising consumers such as industrial consumers cannot be penalised, for making good the cost, to be recovered from the subsidised category beyond the permissible $\pm 20\%$ of the average cost of supply. Any benefit which the Licensee wants to confer to the subsidised category beyond the maximum of $\pm 20\%$ can and should be recovered through Government subsidy and cannot in any way be loaded to the subsidising consumers.

In a catena of judgments (discussed in foregoing paragraphs), the Hon'ble APTEL has held that eventually, the State Commission shall gradually move from the principle of average cost of supply towards cost of supply for each consumer category. The Objector states that the incidence of cross subsidy is even higher when category wise cost of service is considered.

In view of the above, the Objector states that the tariff hike for industrial consumers is invalid in law and fails the mandate of the Electricity Act and Tariff Policy.

9 STATE GOVERNMENT SUBSIDY

the total subsidy commitment by the State Government for un-divided State in FY 2013-14 was Rs. 6,320.81 crore (Rs. 5,490.81 crore + Rs. 830 crore) **towards providing electricity at subsidised rates at the approved consumption levels in the Tariff Order.**

The actual sales for FY 2013-14 towards subsidised categories filed by the Licensee demonstrate that the actual consumption of the subsidised categories is much higher than the levels approved in the Tariff Order for FY 2013-14 basis which, the subsidy levels had been approved

This requires for re-adjustment of the subsidy level from the State Govt. such that the cost of supplying subsidised power to select categories is not borne by the other consumers in terms of true up of the revenue gap of FY 2013-14, 2014-15 and in the ARR of FY 2015-16

The Hon'ble Commission in the FY 2013-14 Tariff Order had determined the cost of service of LT-1 and LT-5 categories based on the embedded cost of service model. Considering the approved cost of service of the subsidised categories and the actual sales in FY 2013-14, the adjusted revised subsidy requirement has been worked out in the table below:

Table: Adjusted Subsidy Requirement in FY 2013-14 as per Actual Sales for TSSPDCL

Consumer Categories	Energy Sales	Approved CoS	Cost to Serve	Actual Revenue Assessment	Subsidy Requirement
	MU	Rs/kWh	Rs Crore	Rs Crore	Rs Crore
	A	B	$C = A \times B / 10$	D	$E = C - D$

Licensees are obligated to provide supply to all categories of consumers, including subsidised consumers.

As per the National Tariff Policy, the tariffs to the consumers are to be fixed at +/- 20% of COS. Hence it is deemed that the consumers whose tariffs are fixed over and above COS will cross subsidise the consumers whose tariffs are below COS to ensure revenue neutrality.

The tariff to the subsidised categories is fixed after considering the Cross subsidy portion of the subsidizing consumers and the subsidy portion extended by the state government.

Any other revenue deficit after adjusting cross subsidy will be met through Government Subsidy.

LT- I(A) Domestic - up to 50 units/month	732.92	6.48	474.93	190.02	284.91
LT- I(B) Domestic - >50 and up to 100 units/month	1389.28	6.48	900.25	327.21	573.04
LT- I(C) Domestic- above 100 & up to 200 units/month	2221.80	6.48	1439.73	706.25	733.48
LT-V	9190.48	4.71	4328.72	48.29	4280.43
Total	13534.48		7143.63	1271.77	5871.86

Similarly, the adjusted revised subsidy requirement has been worked out for FY 2014-15 by considering the approved cost of service of the subsidised categories, revised estimated sales in FY 2014-15 and projected revenue realisation. The same is tabulated below:

Table: Subsidy Requirement in FY 2014-15 based on Revised Estimated Sales for TSSPDCL

Consumer Categories	Energy Sales	Approved CoS	Cost to Serve	Estimated Revenue Assessment	Subsidy Requirement
	MU	Rs/kWh	Rs Crore	Rs Crore	Rs Crore
	A	B	$C = A \times B / 10$	D	$E = C - D$
LT- I(A) Domestic - up to 50 units/month	513.06	6.48	332.46	202.51	129.95

LT- I(B) Domestic - >50 and up to 100 units/month	1129.83	6.48	732.13	264.24	467.89	
LT- I(C) Domestic- above 100 & up to 200 units/month	2160.16	6.48	1399.78	687.34	712.44	
LT-V	7617.72	4.71	3587.95	46.73	3541.22	
Total	11420.77		6052.32	1200.82	4851.50	

Similarly, the subsidy requirement for FY 2015-16 has been worked out considering the projected sales for FY 2015-16, revenue realisation and cost to serve computed by the Licensee in the subject petitions and the same is tabulated below:

Table: Subsidy Requirement in FY 2015-16 based on Projected Sales for TSSPDCL

Consumer Categories	Energy Sales	Approved CoS	Cost to Serve	Projected Revenue Assessment	Subsidy Requirement
	MU	Rs/kWh	Rs Crore	Rs Crore	Rs Crore
	A	B	$C = A \times B / 10$	D	$E = C -$
LT- I(A) Domestic - up to 50 units/month	510.66	6.71	342.65	171.25	171.40
LT- I(B) Domestic - >50 and up to 100 units/month	1184.34	6.71	794.69	263.97	530.72
LT- I(C) Domestic- above 100 & up to 200 units/month	2328.95	6.71	1562.73	731.40	831.33

LT-V	7528.19	6.20	4667.48	42.26	4625.22
Total	11552.14		7367.55	1208.88	6158.67

Thus, the total subsidy requirement from State Govt. towards supply to select sub-categories of LT-1 and LT-V is to the tune of apprx Rs. 13607.93 crore for TSSPDCL as depicted in the table below:

Table: Additional Subsidy Requirement from State Government for TSSPDCL

(Figures in Rs Crore)

Particulars	FY 2013-14	FY 2014-15	FY 2015-16
Subsidy Requirement of LT-1	1591.43	1310.29	1533.45
Subsidy Requirement of LT-V	4280.43	3541.22	4625.22
Total Subsidy Requirement	5871.86	4851.50	6158.67
Less: Subsidy from State Govt.	1627.48	1646.62	0.00
Additional Subsidy Requirement from State Govt.	4244.38	3204.88	6158.67
Total Additional Subsidy Requirement from State Govt.	13607.93		

This ratio applies to all the previous years under the second control period i.e., from FY 2009-10 to 2012-13. It is urged that the Hon'ble Commission may determine the additional subsidy requirement from State Govt. for supply of electricity to subsidised categories **based on actual consumption** of subsidised categories for all the years covered under the Tariff Regulations.

Similar principle has been adopted by the Hon'ble Uttar Pradesh Electricity Regulatory Commission (UPERC) in its Order dated 21st May, 2013 in Petition No. 809 of 2012 while truing up the ARR for FY 2007-08 in respect of the

distribution licensees of Uttar Pradesh namely Dakshinanchal Vidyut Vitran Nigam Limited, Madhyanchal Vidyut Vitran Nigam Limited, Paschimanchal Vidyut Vitran Nigam Limited and Purvanchal Vidyut Vitran Nigam Limited.

In such Order, the Hon'ble UPERC had computed the actual subsidy requirement considering the actual sales of the subsidised categories namely LMV-1 (a): Consumer getting supply as per "Rural Schedule" and LMV-5: Private Tube wells (PTW) in FY 2007-08. The Hon'ble UPERC had computed the revised subsidy requirement at Rs. 2,940.83 crores based on actual consumption of subsidised categories. Out of the above, the revenue subsidy provided by Govt. of Uttar Pradesh was only Rs. 1,854.72 crores. Thus the balance subsidy of Rs. 1,086.11 crores was applied as a reduction from the ARR being trued up, thus, insulating the other subsidising consumers. The distribution licensees were directed to realise such sums from the State Government which is understood to have started paying the shortfall to the Discoms based on the decision of the Hon'ble UPERC.

It is the consistent practice of the Hon'ble UPERC to approve additional subsidy requirement based on actual consumption of subsidised categories. Similar treatment was provided by the Hon'ble UPERC in the truing up orders of state owned licensees for FY 2008-09 to 2011-12 in its order dated 1st October, 2014. The extracts of the relevant pages are provided for the perusal of this Hon'ble Commission as per '**Annexure-1A**'.

Attention is furthermore invited to erstwhile Regulatory Commission's Tariff Order for 2004-05, which states that the Commission approved the revenue and sales to agricultural consumers and then approves the subsidy and does not allow for any further increased sales to this category of consumers.

Erstwhile Regulatory Commission's subsidy administration mechanism for agricultural consumers: 2004-05 Tariff order

The GOAP obligation towards subsidy payments to DISCOMs is limited to

*the quantities mentioned in this order. **If the DISCOMs exceed tariff order quantities and thus the subsidy requirement, the Commission will not entertain any request for additional quantities of energy to subsidized categories unless the permission of the GoAP is taken for additional subsidy if the excess consumption relates to agriculture.** In other categories, if there is excess consumption, no additional subsidy will be recommended by the Commission to GoAP.”*

Keeping in view the above submissions, figures and the relevant observations of the Appellate Tribunal and other Regulatory Commissions, **it is very clear that for any additional sale to the subsidised consumers the government has to release additional subsidy. The Hon’ble Commission itself has stated this in its orders but failed to implement it by seeking additional subsidy.** The Objector strongly urges the Hon’ble Commission to direct the State Government to release the additional subsidy required by the Licensee for sale of additional power to agriculture consumers and other subsidised categories during the previous control periods.

Here, it is also pertinent to mention that this matter had been raised before the erstwhile Regulatory Commission in the Statement of Objects filed by an Objector against the ARR and Tariff Petitions for FY 2013-14. However the erstwhile Regulatory Commission & the Licensee had dealt this matter in a broad brush manner without suitably addressing the concern and without going into the core of the issue.

The relevant extracts of the FY 2013-14 Tariff Order are reproduced below:

“199. Objections/Suggestions regarding Adjustment of Subsidy: *M/s Ferro Alloys Producers’ Association & others have stated that, no adjustment for higher subsidy from GoAP for higher agriculture sales has been envisaged in the past orders or current ARR and Tariff Petition for FY 2012-13. The subsidy provision by GoAP should be considering the actual consumption of all subsidising categories rather than the approved*

consumption levels.

Licensee's Response: *The Licensee has been requesting the Hon'ble Commission for the last two years to consider the truing up of actual agriculture sales and distribution Losses. The Discom has also filed during the year 2013-14, that the actual agricultural sales have been much higher than the approved sales and the additional power requirement due to higher losses and additional agricultural sales will have to be purchased at a marginal cost of Rs. 10.00/Unit or as applicable by the licensee. The above cost is not been considered/ captured while determining the FSA due to non inclusion of cost in formula as per the existing regulation. Similarly, Regulation 4 of 2005 does not cover the mechanism to recover additional cost incurred by the Licensee. By not recognizing this huge cost by the Hon'ble Commission, Licensees are losing around 10 times of their current Return of Equity. In light of the above, Licensee requested the Hon'ble Commission to devise an appropriate mechanism to recover the additional cost either through FSA or true-up mechanism.*

Commission's View: *The Licensees are expected to strictly adhere to the tariff order quantities to avoid revenue loss due to sales beyond approved quantities for agriculture."*

(Emphasis supplied)

The erstwhile Regulatory Commission while dealing with this issue perhaps misunderstood the objections of the Objector. While the Objector had specifically requested for re-statement of subsidy levels based on actual consumption of subsidised categories, the Hon'ble Commission did not deliberate on this specific issue raised by the Objector.

The Full Cost Recovery Tariffs do not mean that the tariffs from subsidising categories be fixed first and then subsidy be juxtaposed thereon. Rather, the tariffs be fixed for all consumer categories at cost of service levels or at $\pm 20\%$

of CoS levels. Thereupon the subsidised tariffs should be worked upon after considering the available subsidy levels from the State Government.

Thus, in order to summarise:

- The Hon'ble Commission should re-adjust the level of subsidy from State Govt. based on actual consumption levels such that the cost of supplying subsidised power to select consumer categories is not borne by the subsidising consumers in terms of the true up of the revenue gap of FY 2013-14 and FY 2014-15.
- The additional subsidy requirement from the State Govt. towards subsidised power supply to select sub-categories of LT-1 and LT-V is to the tune of apprx Rs. 4244.38 crore in FY 2013-14, Rs. 3204.88 crore in FY 2014-15 and Rs. 6158.67 crore in FY 2015-16 in respect of TSSPDCL.
- This ratio applies to all the previous years under the second control period i.e., from FY 2009-10 to 2012-13. It is urged that the Hon'ble Commission determine the additional subsidy requirement from State Govt. for supply of electricity to subsidised categories based on actual consumption of subsidised categories for all the years covered under the Tariff Regulations.
- There is precedence of this treatment in terms of the UPERC Order dated 21st May, 2013 and 1st October 2014 reference of which has been provided by the Objector.
- Full Cost Recovery Tariffs do not mean that the tariffs from subsidising categories be fixed first and then subsidy be juxtaposed thereon. Rather, the tariffs be fixed for all consumer categories at cost of service levels or at $\pm 20\%$ of CoS levels. Thereupon, the subsidised tariffs should be worked upon after considering the available subsidy levels from the State Government.

	<p>10 TIME OF DAY (TOD) TARIFFS – REBATE FOR OFF-PEAK PERIODS</p> <p>The Time of Day tariff (ToD) is a widely accepted Demand side Management (DSM) measure for energy conservation by price. The ToD tariff encourages the distribution licensees to move towards separation of peak and off-peak tariffs which would help in reducing consumption as well as costly power purchase at the peak time.</p> <p>The ToD tariffs are set in such a way, that it inherently provides incentives and disincentives for the use of electricity in different time periods. The underlying objective of implementing ToD tariffs is to flatten the load curve over a period of a day resulting in a reduction in the peaking power requirement and also to enhance power requirement during off peak period.</p> <p>However, the ToD tariff should be a tool only to effectively undertake the DSM measure and flatten the load curve but not as a source of additional revenue. Typically, the ToD tariffs framed by other states in the country provide for a surcharge payable for peak hour consumption and a rebate for consumption during off-peak periods. Moreover, the ToD tariffs are generally imposed on industrial consumers, as it is perceived that such consumers operate in shifts and can adjust their demand based on a ToD tariff which provides for surcharge during peak periods and rebates for consumption during off-peak periods. Thus, surcharge act as a deterrent for consumption during peak periods and rebates offer incentive to shift demand to off-peak periods. The idea is to encourage the shift of demand from peak to off-peak periods so as to flatten the load curve and optimise the power purchase cost.</p> <p>The erstwhile Regulatory Commission had introduced ToD tariff from 1st August, 2010. However, the Hon’ble Commission has only approved an</p>	<p>ToD tariff is mainly to reduce the overall peak demand in the system and also ensure Grid Discipline.</p> <p>Short term power purchase price varies significantly depending on the time of the day, season, etc. keeping in view of the above Distribution Licensee has proposed to continue ToD tariff to recover partial additional charges over and above the tariff applicable to meet the expensive power.</p>

additional surcharge of Rs. 1.00 per unit during the peak hours and has not provided any rebate for consumption of power during off-peak hours. As per section 62(3) of the Electricity Act 2003, the tariff should reflect cost and have to be based on cost causation principles.

The Objector submits that the ToD tariff approved by Hon'ble Commission not only is in contrast to the applicable scheme in other states but is also counter-productive to demand side management as it offers no incentive to consumers to shift their demand to off-peak periods

S.No	Name of Utility & Time Period	Effective dates	Consumer Category & TOD Charges applicable			
1	Andhra Pradesh	w.e.f. 01.04.2013	HT Consumer (HT -I (A), HT -II & HT -III)			
	1800 Hrs -2200 Hrs		Voltage Supply -11kv, 33kv, 132kv & above			
			100 Paise/kVAh In addition to the normal energy charges at respective voltages			
2	Assam	w.e.f. 01.12.2013	HT-V(B)	HT-V(c) - Option1	HT-VI Tea, Coffee & Rubber	HT-VII Oil & Coal
	0600 Hrs -1700 Hrs (normal)		515 Paise/KWh	410 Paise/KWh	565 Paise/KWh	580 Paise/KWh
	1700 Hrs-2200 Hrs (peak)		740 Paise/KWh	555 Paise/KWh	745 Paise/KWh	755 Paise/KWh

						Wh
	2200 Hrs - 0600 Hrs (night)		450 Paise/KWh	360 Paise/KWh	545 Paise/KWh	565 Paise/KWh
3	Bihar	w.e.f. 01.04.2013	All HT Consumers			
	Normal period (0500 Hrs - 1700 Hrs)		Normal rate of energy charges			
	Evening Peak load period (1700 Hrs -2300 Hrs)		120% of normal rate of energy charges			
	Off-peak load period (2300 Hrs -0500 Hrs)		85% of Normal rate of energy charges			
4	Chandigarh	w.e.f. 01.04.2013	HT/EHT Consumers (Optional)			
	Normal period (0600 Hrs - 1800 Hrs)		Normal rate of energy charges			
	Evening Peak load period (1800 Hrs -2200 Hrs)		120% of normal rate of energy charges			
	Off-peak load period (2200 Hrs -0600 Hrs)		90% of Normal rate of energy charges			
5	Chhattisgarh	w.e.f. 01.08.2013	For Consumer EHV-2, EHV-3, EHV-4, HV-1, HV-2, HV-3 and HV-10			
	Normal period (0500 Hrs - 1800 Hrs)		Normal rate of energy charges			

		Evening Peak load period (1800 Hrs -2300 Hrs)		130% of normal rate of energy charges	
		Off-peak load period (2300 Hrs -0500 Hrs)		85% of Normal rate of energy charges	
	6	Delhi (BYPL,BRPL,ND PL-TPDDL & NDMC)	w.e.f. 01.08.2013	All consumers (Other than domestic) sanctioned load is 100 KW/108 KVA & Above	
		April-September (peak hours) 1500 Hrs -2400 Hrs		15% surcharge on energy charges	
		Oct-March (Peak hours) 1700 Hrs -2300 Hrs		10% surcharge on energy charges	
		April-September (Off-peak hours) 0000 Hrs -0600 Hrs		15% Rebate on energy charges	
		October-March (Off-peak hours) 2300 Hrs -0600 Hrs		15% Rebate on energy charges	
	7	Goa		w.e.f. 01.04.2013	HT/EHT Consumers (Optional)
		Normal period (0600 Hrs - 1800 Hrs)	Normal rate of energy charges		
		Evening Peak load period	120% of normal rate of energy charges		

	(1800 Hrs -2200 Hrs)			
	Off-peak load period (2200 Hrs -0600 Hrs)		90% of Normal rate of energy charges	
8	Jharkhand	w.e.f. 01.08.2012	All HT Consumers	
	Morning peak hours (0600 Hrs - 1000 Hrs)		120% of normal rate of energy charges	
	Evening peak hours (1800 Hrs - 2200 Hrs)		120% of normal rate of energy charges	
	Off-peak period (2200 Hrs - 0600 Hrs)		85% of normal rate of energy charges	
9	Karnataka	w.e.f. 01.05.2013	LT-5(a) & (b) Industrial heating & motive power (optional)	HT-1 and HT-2 (a), (b), (c)
	2200 Hrs - 0600 Hrs		(-) 125 Paise /KWh	(-) 125 Paise /KWh
	0600 Hrs -1800 Hrs		NIL	NIL
	1800 Hrs -2200 Hrs		(+) 100 Paise/KWh	(+) 100 Paise/KWh
10	Kerala	w.e.f. 01.05.2013	EHT, HT and LT Industrial Consumer (Load above 20 KW)	LT-I(.500 Units/months)
	Normal period (0600 Hrs - 1800 Hrs)		100% Ruling rate of energy charges	100% Ruling rate of energy charges
	Evening peak		150% Ruling rate of	120% Ruling rate

	(1800 Hrs -2200 Hrs)		energy charges	of energy charges
	Off-peak period (2200 Hrs - 0600 Hrs)		75% Ruling rate of energy charges	90% Ruling rate of energy charges
11	Madhya Pradesh	w.e.f. 01.04.2013	For Coal Mines, Industrial , Seasonal, Irrigation, PWW consumers	
	Normal period (0600 Hrs - 1800 Hrs)		Normal rate of energy charges	
	Evening Peak load period (1800 Hrs -2200 Hrs)		15% of normal rate of energy charge as surcharge	
	Off-peak load period (2200 Hrs -0600 Hrs)		7.5% of normal rate of energy charge as surcharge	
12	Maharashtra	w.e.f. 01.08.2012	LT-V(B), LTX(B) & ©, LT-V(A) & LT-x(A) optional, HT-I, HT-II (B), HT IV & HT - IX (above base tariff)	
	0600 Hrs -0900 Hrs & 1200 Hrs - 1800 Hrs		NIL	
	0900 Hrs - 1200 Hrs		(+) 80 Paise/KWh	
	1800 Hrs -2200 Hrs		(+) 110 Paise/KWh	
	2200 Hrs -0600 Hrs		(-) 100 Paise/KWh	
13	Maharashtra - Mumbai	01.09.2013	LT & HT Industrial, Commercial, Public Services (Over & above base tariff)	

		(B.E.S.T, TATA Power Co. & Reliance Energy)			
		0600 Hrs -0900 Hrs		NIL	
		0900 Hrs - 1200 Hrs		(+) 50 Paise /KWh	
		1200 Hrs -1800 Hrs		Nil	
		1800 Hrs -2200 Hrs		(+) 100 Paise /KWh	
		2200 Hrs -0600 Hrs		(-) 75 Paise/KWh	
14	Puducherry		w.e.f. 01.04.2013	HT/EHT Consumers (Optional)	
	Normal period (0600 Hrs - 1800 Hrs)			Normal rate of energy charges	
	Evening peak load period (1800 Hrs - 2200 Hrs)			120% of normal rate of energy charge	
	Off-peak load period (2200 Hrs -0600 Hrs)			90% of normal rate of energy charge	
15	Tripura		w.e.f. 01.04.2013	Industrial. Tea/Coffee/Rubber, Bulk supply , Water Works & Irrigation consumers	
	Normal period (0500 Hrs - 1700 Hrs)			Normal rate of energy charges	
	Evening Peak			140% of normal rate of energy charge	

	load period (1700 Hrs -2300 Hrs)				
	Off-peak load period (2300 Hrs -0500 Hrs)				60% of normal rate of energy charge
16	Uttarakhand		LT & HT Industrial		
	Season Time of day		Normal Hrs	Peak Hrs	Off Peak Hrs
	Winters 1st October - 31st March		09:30-17:30 Hrs	06:00-09:30 & 17:30 - 22:00 Hrs	22:00-06:00 Hrs
	Summers 1st April - 30th September		07:00-18:00Hrs	18:00 - 23:00 Hrs	23:00-07:00 Hrs
	For LT Industry - Energy Charges		340 Paise/KV Ah	5100 Paise/KV Ah	306 Paise/KVAh
	For HT Industry - Energy Charges				
	Load Factor up to 33%		305 Paise/kV Ah	540 Paise/kV Ah	275 Paise/kVAh
	Load Factor above 33% and up to 50%		330 Paise/kV Ah	540 Paise/kV Ah	297 Paise/kVAh
	Load Factor above 50%		360 Paise/kV AH	540 Paise/kV Ah	324 Paise/kVAH
17	Uttar Pradesh		Small & Medium Power and Large & Heavy Power		
	2200 Hrs - 0600	10.0 6.20			92.5% of Normal rate of energy charge

	Hrs				
	0600 Hrs 1700-Hrs		Normal rate of energy charges		
	1700 Hrs - 2200 Hrs		115% of Normal rate of energy charge		
18	West Bengal	Applicable Tariff Scheme w.e.f 01.04.2013	Low and medium Voltage Consumers		
	Season Time of day		06:00-17:00 Hrs	17:00 Hrs-23:00 Hrs	23:00 Hrs - 06:00 Hrs
	i) Irrigation pumping for agriculture (Metered)		354 Paise/kWh	729 Paise/kWh	212 Paise/kWh
			High & Extra High Voltage Consumers		
	i) Industries (220 KV)		534 Paise/kWh	747 Paise/kWh	353 Paise/kWh
	ii) Industries (400 KV)		514 Paise/kWh	719 Paise/kWh	340 Paise/kWh
	iii) Community Irrigation		560 Paise/kWh	885 Paise/kWh	279 Paise/kWh
	iv) Commercial Plantation		605 Paise/kWh	847 Paise/kWh	400 Paise/kWh
19	West Bengal - Durgapur Projects Ltd.	Tariff Scheme w.e.f	Low and medium Voltage Consumers		
	Season Time of		06:00-	17:00	23:00 Hrs -

	day		17:00 Hrs	Hrs-23:00 Hrs	06:00 Hrs	
	Irrigation pumping for agriculture (Metered)		303 Paise/kWh	606 Paise/kWh	167 Paise/kWh	
	i) Industries (33KV)		High & Extra High Voltage Consumers			
	Summer		428 Paise/kWh	565 Paise/kWh	321 Paise/kWh	
	Monsoon		426 Paise/kWh	562 Paise/kWh	320 Paise/kWh	
	Winter		424 Paise/kWh	560 Paise/kWh	318 Paise/kWh	
	ii) Industries (132KV)					
	Summer		417 Paise/kWh	550 Paise/kWh	313 Paise/kWh	
	Monsoon		415 Paise/kWh	548 Paise/kWh	311 Paise/kWh	
	Winter		413 Paise/kWh	545 Paise/kWh	310 Paise/kWh	
	iii) Community Irrigation /Irrigation					

	Summer		424 Paise/kWh	763 Paise/kWh	280 Paise/kWh
	Monsoon		422 Paise/kWh	760 Paise/kWh	279 Paise/kWh
	Winter		420 Paise/kWh	756 Paise/kWh	277 Paise/kWh
20	West Bengal - DPSC Ltd.	Applicable Tariff Scheme w.e.f 01.04.2013	Low and medium Voltage Consumers		
	Season Time of day		06:00-17:00 Hrs	17:00 Hrs-23:00 Hrs	23:00 Hrs - 06:00 Hrs
	Irrigation		269 Paise/kWh	649 Paise/kWh	178 Paise/kWh
	i) Industries (33KV & above)		High & Extra High Voltage Consumers		
	Summer		495 Paise/kWh	692 Paise/kWh	326 Paise/kWh
	Monsoon		491 Paise/kWh	688 Paise/kWh	324 Paise/kWh
	Winter		487 Paise/kWh	683 Paise/kWh	321 Paise/kWh
	ii) Community Irrigation /Irrigation				

	Summer		365 Paise/kW h	729 Paise/kW h	219 Paise/kWh
	Monsoon		361 Paise/kW h	721 Paise/kW h	217 Paise/kWh
	Winter		357 Paise/kW h	713 Paise/kW h	215 Paise/kWh

The table above demonstrates, that the ToD tariffs applicable in other states offer not only surcharge for peak period consumption but also rebate / incentive for off-peak period consumption.

In view of the above, the Objector urges that the Hon'ble Commission should modify the ToD structure and provide for a commensurate rebate of around 15% of the energy charges for consumption in the off-peak period.

11 REBATE FOR TIMELY PAYMENT OF BILLS

The Objector submits that a nominal rebate should be provided to the consumers for timely and prompt payment which can improve the collection efficiency and the cash flows of the Licensee. While the provision for delayed payment surcharge is provided in the Tariff Orders, the honest consumers should also be rewarded for timely payment of bills. The provision for rebate on timely payment of bills has been provided in the rate schedule of many States as depicted in the table below:

Table: Provision for Rebate on Timely Payment of Bills in Other States

It is not in the purview of the Licensee

S No.	State	Rebate Provision
1	Karnataka	0.25%
2	Madhya Pradesh	0.25%
3	Maharashtra	1.00%
4	Orissa	1%
5	Uttar Pradesh	0.25%

It is urged that the Hon'ble Commission may approve a Provision for Prompt Payment of Energy Bills which would benefit both the Licensee in terms of improving the cash flows and also rewards the consumers who pays the bills on time i.e., before due date.

12 LOAD FACTOR REBATE

Clause 7.4.d of the APERC (Terms and Conditions for Determination of Tariff for Wheeling and Retail Sale of Electricity) Regulations, 2005 provide that a Filing for Proposed Tariff shall contain:

“Expected Revenue from the proposed Retail Sale Tariffs, Non-Tariff Income and income from Other Business(es) and other matters considered appropriate by the Distribution Licensee, including incentive schemes to consumes, voltage surcharge and power factor surcharge.”

In terms of the aforementioned clause, the erstwhile Regulatory Commission had earlier approved load factor rebate which was applicable 31st July, 2010, subsequent to which it was discontinued. The load factor rebate scheme applicable earlier in un-divided Andhra Pradesh for HT industries is depicted below:

The Hon Commission has discontinued the load factor incentive scheme w.e.f. 1st august 2010 in view of the power shortages that led to restrictions and control measures. The order of the commissions given in the Tariff Order 2010-11 is reproduced below:

HT Load Factor Incentive Scheme

217. At present, the HT-I(A) Industrial Consumers are provided with a load factor incentive scheme in which a concession/rebate on energy charges is given if the load factor is above certain threshold levels. This scheme has been in operation for the past several years with modifications from time to time as approved by the Commission. The scheme was originally intended to encourage and stabilize demand and was intended to

Table: Load Factor Rebate Framework for HT Industries 31st July, 2010

LF Range	Incentive on Energy Charges
LF < = 30%	NIL
30% <LF < =50%	5%
50% <LF < =60%	10%
60% <LF < =70%	15%
LF > 70%	20%

The Objector submits that high Load Factor denotes that the system is best utilised and will benefit the system in terms of load management, reduction of losses, etc on account of high load factor. The provision for incentive scheme such as load factor rebate is mandated by Clause 7.4 of the Tariff Regulations and similar incentive schemes are applicable in various other states such as Madhya Pradesh, Maharashtra and West Bengal.

Table: Load Factor Rebate Schemes applicable in Other States

S. No.	States	Tariff Order Year	LF Criteria	Rebate
1	Maharashtra	2012-13	> 75%	75%-85% - 0.75% on Energy Charges for every 1% increase, >85% - 1.00% on Energy Charges for every 1% increase
2	Madhya Pradesh	2014-15	>50%	11 kV - Rs. 0.60 per unit 33 kV - Rs. 1.00 per unit

ensure fuller utilization of surplus power generation capacity available at that time.

218. The surplus power situation has changed since then significant power shortages are observed in recent times that have even led to restrictions and control measures in supply by Licensees. Shortages and deficits are now becoming a norm and the situation is not likely to improve substantially in the foreseeable future. Short term market purchases, sometimes even at the rates ranging from Rs.7 -10 per unit, are being resorted to, to meet the demand in the last 3 years. Buying such costly power and then supplying it at half the cost and then even pay incentive / rebate for power consumption is an anomalous situation. In this context, the Commission decided to discontinue the incentive scheme w.e.f. 1st August, 2010.”

In view of the above situations, TSSPDCL cannot extend the load Factor incentive.

					132 kV - Rs. 0.80 per unit 220 kV and above - Rs. 0.70 per unit																																															
3	West Bengal	2013-14	>55%	<table border="1"> <thead> <tr> <th rowspan="2">Load Factor</th> <th colspan="3">Rebate in Paise / kWh</th> </tr> <tr> <th><33 kV</th> <th>33 kV</th> <th>>33 kV</th> </tr> </thead> <tbody> <tr> <td>50%-60%</td> <td>1</td> <td>2</td> <td>3</td> </tr> <tr> <td>60%-65%</td> <td>7</td> <td>8</td> <td>9</td> </tr> <tr> <td>65%-70%</td> <td>14</td> <td>29</td> <td>39</td> </tr> <tr> <td>70%-75%</td> <td>20</td> <td>35</td> <td>45</td> </tr> <tr> <td>75%-80%</td> <td>25</td> <td>40</td> <td>50</td> </tr> <tr> <td>80%-85%</td> <td>30</td> <td>45</td> <td>55</td> </tr> <tr> <td>85%-90%</td> <td>35</td> <td>50</td> <td>60</td> </tr> <tr> <td>90%-92%</td> <td>40</td> <td>55</td> <td>65</td> </tr> <tr> <td>92%-95%</td> <td>45</td> <td>60</td> <td>70</td> </tr> <tr> <td>>95%</td> <td>50</td> <td>65</td> <td>75</td> </tr> </tbody> </table>	Load Factor	Rebate in Paise / kWh			<33 kV	33 kV	>33 kV	50%-60%	1	2	3	60%-65%	7	8	9	65%-70%	14	29	39	70%-75%	20	35	45	75%-80%	25	40	50	80%-85%	30	45	55	85%-90%	35	50	60	90%-92%	40	55	65	92%-95%	45	60	70	>95%	50	65	75	
Load Factor	Rebate in Paise / kWh																																																			
	<33 kV	33 kV	>33 kV																																																	
50%-60%	1	2	3																																																	
60%-65%	7	8	9																																																	
65%-70%	14	29	39																																																	
70%-75%	20	35	45																																																	
75%-80%	25	40	50																																																	
80%-85%	30	45	55																																																	
85%-90%	35	50	60																																																	
90%-92%	40	55	65																																																	
92%-95%	45	60	70																																																	
>95%	50	65	75																																																	
<p>In view of the above, the Objector prays to the Hon'ble Commission to re-introduce Load Factor Rebate as the presence of such a scheme would incentivise the industry to utilise its machinery in an efficient manner thereby helping the Licensee in flattening the load curve.</p> <p>13 SEGREGATION OF TECHNICAL AND COMMERCIAL LOSSES</p> <p>In the ARR filed by the Petitioner, there are no separate estimates provided for technical and commercial losses, except description of measures aimed at reduction of the same. It is pertinent to mention that distribution loss is a controllable factor under the MYT framework.</p> <p>In view of the above, to set the base line of distribution loss estimate, the Hon'ble Commission may either require the Licensee</p>					<p>Tsspdcl is taking the following measures for reduction distribution losses</p> <p>Theft control, proper categorization of services, replacement of electromechanical meters with electronic meters, shifting of meters from inside to outside of the house, replacement of defective meters on monthly basis, inspection of UDC and OSL services, regularization of unauthorized services, sealing of meters</p>																																															

	<p>to carry out proper loss estimation studies for assessment of technical and commercial losses under its supervision, or initiate a study itself. The study should segregate voltage-wise distribution losses into technical loss (i.e. Ohmic/Core loss in the lines, substations and equipment) and commercial loss (i.e. unaccounted energy due to metering inaccuracies/inadequacies, pilferage of energy, improper billing, no billing, unrealized revenues etc.). Such a study would enable the Hon'ble Commission to set targets for loss reduction and insulate the consumers from the burden of commercial losses which is attributable to the inefficiencies of the Licensee.</p>	
	<p>14 ROADMAP FOR 100% METERING</p> <p>Section 55(1) of the Electricity Act, 2003 provides that <i>“no licensee shall supply electricity, after the expiry of two years from the appointed date, except through installation of a correct meter in accordance with regulations to be made in this behalf by the Authority”</i></p> <p>The erstwhile Regulatory Commission in the FY 2013-14 Tariff Order had noted that complete metering of agricultural services is necessary for proper consumption estimate. The relevant extract is reproduced below:</p> <p><i>“The Commission is of the view that there is no alternative except for complete metering of agricultural services for proper consumption estimate.”</i></p> <p>However, there is no progress at the ground level in terms of metering of agricultural consumers. There is absence of any roadmap for 100% metering, particularly of agriculture consumers who are being supplied electricity free of cost and the burden is imposed on industrial consumers in terms of cross subsidy. It is urged that the Hon'ble Commission cannot remain a mute spectator of the non-compliance of the Electricity Act, 2003. An appropriate roadmap for 100% metering should be approved by the Hon'ble Commission</p>	<p>Though section 55(1) mandates the licensee to supply electricity through a correct meter, the second provision of sec 55(1) says that <i>‘provided further this the state commission may, by notification extend the said period of two years for a class or classes of persons or for such area as may be specified in that notification.’</i> In pursuance thereof, the Hon commission of undivided state of Andhra Pradesh, every year in the tariff order stated that since metering agricultural is not completed, the estimation of agricultural consumption shall be done as per the methodology which is approved by commission. At present in the tariff order for FY 2013-14, the commission directed the discoms to estimate the agricultural consumption based on new methodology which is approved and the same is being complied by the Licensee.</p>

and a realistic time frame should be laid. The road map should provide for disincentives in case of slippages / non compliance by the Licensee towards the targets set for metering. The Objector feels that unless very clear incentives and disincentives are built in the system, the vision of universal metering would remain merely a wishful and glorious intention of the legislature.

15 TRUE UP OF TSSPDCL FOR FY 2013-14

The Petitioner has claimed a true down of Rs. 161.74 crore attributable to the erstwhile APCPDCL, excluding the expenses pertaining to Ananthapur and Kurnool districts, which were transferred to APSPDCL at the time of state bifurcation. As against this, the overall true up for TSSPDCL (erstwhile APCPDCL) including the expenses pertaining to Ananthapur and Kurnool, is to the tune of Rs. 729.52 crore for FY 2013-14 as depicted in the table below:

Table: True up Claimed by TSSPDCL for FY 2013-14 including expenses pertaining to Ananthapur and Kurnool Districts

ARR Line Item (Rs Crore)	Approved in Tariff Order	Actual as per Audited Accounts	Deviation
Distribution Cost	1699.69	1804.66	104.97
Transmission Charges	649.53	649.53	0.00
SLDC Charges	19.18	19.18	0.00
PGCIL & ULDC charges	208.28	277.32	69.04
Network and SLDC Cost	2576.68	2750.69	174.01
Power purchase	15129.47	13552.00	-1577.47
Interest on Consumer Security Deposits	180.37	175.90	-4.47

The TSSPDCL has segregated the true Up claims between the Anantapur, Kurnool districts and TSSPDCL with the intention not to burden the consumers of the TSSPDCL with the Anantapur and Kurnool costs.

Supply margin in Retail Supply Business	11.69	13.94	2.25
Other Costs if any	0.15	0.52	0.37
Supply Cost	15321.68	13742.36	-1579.32
Aggregate Revenue Requirement	17898.36	16493.05	-1405.31
Revenue from Tariff	16172.86	14120.48	-2052.38
Non-Tariff Income	98.00	15.66	-82.34
Tariff Subsidy	1627.48	1627.48	0.00
Total Revenue	17898.34	15763.62	-2134.72
Total Gap / (Surplus) from Retail Business	0.00	729.52	729.52

It is stated that the expenses pertaining to the Ananthapur and Kurnool districts ought not to be excluded from the Revenue Gap, as the truing up is to be done at the Licensee level i.e., TSSPDCL (erstwhile APCPDCL). It is also pertinent to mention that the APSPDCL has not filed a separate true up for Ananthapur and Kurnool districts. Hence, the consumers cannot be deprived of the legitimate truing up which they are entitled to, as per the terms of the Tariff Regulations.

In view of the above, it is stated that the truing up exercise may be done at the licensee level for FY 2013-14 as the districts of Ananthapur and Kurnool were part of TSSPDCL (erstwhile APCPDCL)

Further, the objections in respect of the true up claims of TSSPDCL for FY 2013-14 are summarised below:

1) Non Consideration of Delayed Payment Charges for Truing up: A close scrutiny of the subject Petition and the financial statements of TSSPDCL for FY 2013-14 reveal that Delayed Payment Charges to the

In the filing of ARR for the years, no bad & doubt full debts are claimed by the licensee and the Hon'ble Commission also not provided for bad & doubt full debts from the

<p>tune of Rs. 387.96 crore have not been added to the revenue being trued up. Delayed Payment Charges are in the nature of revenue and is a tariff income. The Objector humbly submits that the Delayed Payment Charges ought to be trued up and deducted from the ARR.</p>	<p>revenue from sale of power debtors. In spite of the above, the billing and collection procedure prescribed by the Hon'ble Commission for revenue from sale of power from the consumers is as follows.</p> <ul style="list-style-type: none"> ➤ The energy supplied to consumers is being billed after completion of billing month (monthly/bi-monthly) only. ➤ The due is fixed by giving 15 days from the date of the bill. ➤ The consumer is given another 15 days from the due date of the bill for disconnection of his service. <p>From the above, it is observed that the two month revenue from sale of power is held up with consumer. To meet the above, the working capital is required by the licensee. The Hon'ble Commission has allowed 1/12 of the O&M Cost only as working capital requirement of the licensee.</p> <p>The licensee is utilizing the Delayed Payment Charges to meet the bad & doubt full debts and working capital requirement. In view of the Regulatory accounts, the licensee has excluded the DPS from the Non-Tariff income in true up.</p>
--	---

	<p>2) Supply Margin - The Licensee has claimed Rs. 13.94 crore in FY 2013-14 towards Supply Margin. The Objector submits that there is no provision for allowance of Supply Margin in the Tariff Regulations approved by the Hon'ble Commission. It is urged that the true up should be determined strictly in accordance with the Tariff Regulations and any extraneous claims should be disallowed.</p>	<p>As per the Regulatory practice approved by the Hon'ble Commission, licensee is eligible for 16% return out of which 14% from distribution Business as RoE and remaining 2% as supply margin.</p>		
	<p>3) Adverse Consumer Sales Mix – The Licensee has stated that <i>“The actual revenue during FY 2013-14 after considering non-tariff income of Rs.16 crores is lower by Rs 2135 crores. The main reason for such shortfall in the revenue is due to reduction in the metered sales by 12.97% over the Tariff Order 2013-14 approved value.”</i></p> <p>Further the Licensee has stated:</p> <p><i>“Further as highlighted earlier, the licensee has experienced shortfall in revenue approved by the Hon'ble Commission due to adverse sales mix. The Licensee prays that the Hon'ble Commission allows the licensee to recover the revenue shortfall through appropriate mechanism since as per the current regulation, only power purchase cost deviations are allowed to be recovered through a true-up mechanism.</i></p> <p>The same is detailed in the table below:</p> <p style="text-align: center;">Table: Consumer Sales Mix for FY 2013-14</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="background-color: #d9e1f2;">Approved</th> <th style="background-color: #d9e1f2;">Actual</th> </tr> </thead> </table>	Approved	Actual	<p>The Discom has claimed true-up for expenses incurred as per audited accounts and as per the APERC regulation 4 of 2005.</p> <p>Since it is the actual cost incurred by the Licensee, hon commission is requested to allow the same.</p>
Approved	Actual			

Sales (MU)	Revenue (Rs Crs)	Realization (Rs/Unit)	Sales (MU)	Revenue (Rs Crs)	Realization (Rs/Unit)
34135.50	16270.86	4.77	31869.73	14136.14	4.44

The fall in realisation per unit is due to higher sales to un-metered consumers and lower sales to commercial, LT and Ht industrial consumers. Due to the lower allocation of power, the commercial, LT and HT industrial consumers were not able to meet their power requirement. It was a measured decision of the Licensee to allow the distortion of the consumer sales mix approved in the Tariff Order. The Licensee ought to have maintained the sales mix approved by the Hon'ble Commission. The Petitioner wants to highlight the fact that increase in sales to lower tariff consumers while decreasing the sales mix to higher tariff consumers is the main reason for lower revenue realization. Due to the lower revenue realization, the Licensee is seeking the approval of the Hon'ble Commission for truing up of the revenue gap pertaining to shortfall in revenue. It will be the subsidizing consumers such as commercial and LT and HT Industrial consumers that will be most affected in the form of increased tariffs due to truing up of this revenue shortfall.

The adverse consumer sales mix has led to under recovery of revenue to the tune of Rs. 1,054.73 crore $\{(31869.73 \text{ MU} \times \text{Rs.}4.77 \text{ per unit} / 10) - (\text{Rs.} 14136.14 \text{ crore})\}$. The Objector urges that consumer sales mix is not classified as an 'uncontrollable factor' as per the Terms of the Tariff Regulations and hence the Licensee has to absorb the burden of under recovery on account of adverse consumer sales mix without levying any burden on this account on the consumers.

<p>4) True up of State Government Subsidy based on actual consumption of subsidised categories – As discussed in the foregoing section, titled “State Government Subsidy”, the following category of consumers were subsidised in FY 2013-14 by the State Government:</p> <ul style="list-style-type: none"> • LT-I(A): Consumers with monthly consumption 50 units; • LT-I(B): Consumers with monthly consumption more than 50 and up to 100 units; • LT-I(B): Consumers with monthly consumption more than 100 and up to 200 units and • LT-V consumers <p>The actual sales for FY 2013-14 towards subsidised categories filed by the Licensee demonstrate that the actual consumption of the subsidised categories is much higher than the levels approved in the Tariff Order for FY 2013-14 basis which, the subsidy levels had been approved.</p> <p>This requires for re-adjustment of the subsidy level from the State Government, such that the cost of supplying subsidised power to select categories is not imposed on the other consumers in terms of true up of the revenue gap of FY 2013-14.</p> <p>The Hon’ble Commission in the FY 2013-14 Tariff Order had determined the cost of service of LT-1(A), LT-1(B) and LT-5 categories based on the embedded cost of service model. Considering the approved cost of service of the subsidised categories and the actual sales in FY 2013-14, the adjusted revised subsidy requirement has been worked out in the table below:</p> <p style="text-align: center;">Table: Adjusted Subsidy Requirement in FY 2013-14 as per Actual Sales</p>	<p>As per the National Tariff Policy, the tariffs to the consumers are to be fixed at +/- 20% of COS. Hence it is deemed that the consumers whose tariffs are fixed over and above COS will cross subsidise the consumers whose tariffs are below COS to ensure revenue neutrality.</p> <p>Any other revenue deficit after adjusting cross subsidy will be met through Government Subsidy.</p>
---	--

(Figures in Rs Crore)

Consumer Categories	Energy Sales	Approved CoS	Cost to Serve	Actual Revenue Assessment	Subsidy Requirement
	MU	Rs/kWh	Rs Crore	Rs Crore	Rs Crore
	A	B	C = AxB/10	D	E = C - D
LT- I(A) Domestic - up to 50 units/month	732.92	6.48	474.93	190.02	284.91
LT- I(B) Domestic - >50 and 100 units/month	1389.28	6.48	900.25	327.21	573.04
LT- I(B) Domestic- above 100 & 200 units/month	2221.80	6.48	1439.73	706.25	733.48
LT-V	9190.48	4.71	4328.72	48.29	4280.43
Total	13534.48		7143.63	1271.77	5871.86

The additional subsidy requirement from State Govt. towards supply to LT-1(A), LT-1(B) and LT-V categories is to the tune of apprx Rs. 4,244.38 crore for TSSPDCL as depicted in the table below:

Table: Additional Subsidy Requirement from State Govt. for FY 2013-14

Particulars	(Rs Crore)
Subsidy Requirement of LT-1(A) and LT-1(B)	1591.43

	<table border="1"> <tr> <td>Subsidy Requirement of LT-V</td> <td>4280.43</td> </tr> <tr> <td>Total Subsidy Requirement</td> <td>5871.86</td> </tr> <tr> <td>Less: State Govt. Subsidy as per audited accounts</td> <td>1627.48</td> </tr> <tr> <td>Additional Subsidy Requirement from State Govt.</td> <td>4244.38</td> </tr> </table>	Subsidy Requirement of LT-V	4280.43	Total Subsidy Requirement	5871.86	Less: State Govt. Subsidy as per audited accounts	1627.48	Additional Subsidy Requirement from State Govt.	4244.38		
Subsidy Requirement of LT-V	4280.43										
Total Subsidy Requirement	5871.86										
Less: State Govt. Subsidy as per audited accounts	1627.48										
Additional Subsidy Requirement from State Govt.	4244.38										
	<p>5) Non Tariff Incomes – The Licensee has submitted the details of Non Tariff Incomes in Form 6 and Form 11 of the Tariff Forms published along with the subject petitions. The TSSPDCL has submitted the non tariff incomes to be Rs. 15.66 crore for FY 2013-14. However, there is an imminent deviation in the said figure from the non tariff income stated in the audited accounts. The Hon’ble Commission is requested to conduct a strict prudence check and approve non tariff incomes strictly in line with audited accounts.</p>	<p>Hon’ble Commission has estimated Non-tariff Income based on the annual accounts of the licensee which includes the non-operating incomes. As the incomes such as viz. Delayed Payment Surcharge, Rebate on power purchase, Theft etc are non-operating incomes and some are non-realizable and few are generated by internal efficiencies, these are excluded from the Non-tariff income for the purpose of Regulatory Accounting.</p>									

6) FRP Interest – The Licensee has claimed Rs. 140.88 crore towards interest liability on FRP loan. In this regard, the relevant submissions of the Licensee are reproduced below:

*10. **True-ups:** A scheme for financial restructuring of State owned licensees was formulated and approved by the Government of India to enable the turnaround of the state owned licensees and ensure their long term viability. **The scheme contains measures to be taken by the State Government and State licensees for achieving turnaround by restructuring debt with support through a transitional Finance mechanism.***

*11. **Under FRP scheme, accumulated losses of the Licensee as on 31st March 2013 was considered and was partly taken over by the State Government through issue of bond and the balance needs to be serviced by the Licensee through short-term loan.** As on date the Licensee has structured short-term loan of Rs 1225 cr. The principal repayment of this loan is scheduled to start from FY 2017-18 onwards after a three year moratorium. **The Licensee prays that the Honourable Commission permits the recovery of cost of servicing interest and principal through tariffs as and when principal repayment of loan commences. However, the Licensee has to service the interest cost on the ST loan from FY 2013-14.***

*12. **As the Licensee is not claiming a separate true-up for the years prior to 2013-14 and as the above short term liability is not part of the asset base on which the Licensee earn the return, Licensee need to recover the above interest cost through tariffs. The annual interest cost for the short-term loan is Rs 141 cr. The Licensee prays that the Honourable Commission allows the licensee to recover the above interest***

Then GoAP has agreed to settle the dues payable by GoAP to the extent of Rs 8600 crs as final settlements as on 31-03-2013. In the process the share of TS DISCOMs is Rs 4453 Crs .

As per the scheme envisaged by GOI, initially bonds will be issued by the DISCOMs for 50% of Short term loans outstanding as on 31-03-2013 the cutoff date for FRP and subsequently in the next five years the bonds will be taken over the GoTS depending upon its fiscal space. The interest on bonds and the repayments of bonds will be serviced by GoTS.

1)The details of losses and contribution of each components is already enclosed in the Director's Report of the company Annual accounts 2012-13 which is again reproduced below

“During the Financial Year 2012-13, Company has incurred a Business Loss of Rs.7718.29 Crores which include operational loss of Rs.2078.04 crores. The operational loss is due to increased power purchase costs. And the GoAP has not subsidized in total the Expensive Power purchases and the interest paid for Rs. 790.13 Crores on Short Term Loan drawn for purchase of Expensive Power during the Financial Year 2012-13 which also resulted in loss for the current financial year 2012-13. Apart from the above the Company had written off unapproved Fuel Surcharge Adjustment [FSA] by Honourable APERC for FY 2009-10 to 2011-12 amounting to Rs. 948.17 Crores. During the year the Company had also made provisions towards unbilled and uncollected FSA of Rs. 637.81 Crores for the period 2009-10 to 2010-11 (1st Quarter) due to stay on FSA billing and collections as per the Orders of Honourable High Court, and Government receivables to the extent of Rs. 181.23 crores which are due towards Single Bulb subsidy, Tatkal

cost through tariffs. The Licensee prays that the Honourable Commission allows the Licensee to claim the true-up for distribution business for FY 2013-14 in the next retail supply filing.” (Emphasis supplied)

The point-wise rebuttals to the claims made by the Licensee are provided below:

Subsidy and Subsidy receivable from Government in support of Third Transfer Scheme in respect of taking over of REC Loan and Vidyut bonds. The Government receivables towards addition power subsidy of Rs. 3877.87 Crores have been provided as doubtful. The above provisions have been made due to non commitment by GoAP, non receipt of subsidy from GOAP and there being no provision in budgetary support for Government subsidy towards additional power during F.Y.2013-14. The Company had also made provision for Rs. 82.13 Crores towards the RESCOs absorption of Assets and Liabilities and Certain Fixed Assets of RESCOs have been written as their net book value is unrecognized. The above provisions were made as there was no commitment received from the Government, regarding these receivables. All the above factors have resulted in the net accumulated losses of Rs. 7829.81 crores. Because of the increased accumulated losses the net worth of Company as on 31.03.2013 is showing a negative balances of Rs. 5315.83 crores. The losses are recoverable through true-up mechanism in Tariffs of ensuing years, and the Financial Restructuring package to be implemented by Government of Andhra Pradesh.”

S No.	Licensee's Contention	Objector's Rebuttal
1	<i>Under FRP scheme, accumulated losses of the Licensee as on 31st March 2013 was considered and was partly taken over by the State Government through issue of bond and the balance needs to be serviced by the Licensee through short-term loan.</i>	<p>The Government of India had announced the Scheme for Financial Restructuring of Distribution Companies on October 5, 2012.</p> <p>The said scheme envisaged that State Governments take over 50% of the outstanding short term liabilities (power purchase liability and short term working capital loans) of the State owned distribution companies. Rest of the short term liabilities were to be restructured with guarantee from State Government to enable the turnaround of the State distribution companies</p>

2) Since, the discoms are claiming the interest on STL restructured loans which are the part of FRP scheme, the restructured loan is the liability of DISCOMs as per scheme and the DISCOMs can only pay the debt service on the restructure loans through ARR .There is no additional resources to meet the debt servicing cost of DISCOMS. DISCOMs are only claiming interest and will claim the repayments of EMI from the beginning of 4th year of FRP implementation.
Further , accentuate the facts of FRP , the soft copy of FRP scheme approved by the GoAP can be shared with hon'ble

			<p>and to ensure their long term viability.</p> <p>Thus, the FRP scheme was towards restructuring of past years accumulated losses which were a result of inefficiencies of the Licensee.</p> <p>The Tariff Regulations provide for a normative working capital and interest thereon. Similarly, the power purchase cost is approved in a Tariff Order on a year to year basis based on actuals. The power purchase liability had piled up due to failure of the Licensee to pay up the generators in a timely manner. Similarly, the working capital loans over and above the normative working capital were taken to bridge the cash gap which was due to inefficiency in terms of T&D losses and failure to collect the dues.</p> <p>Thus, there is no occasion for allowance of FRP interest in the ARR / Tariff as the FRP loans pertain to outstanding working capital loans and outstanding</p>	<p>objectors as desired by them</p> <p>In summary the GoTS will pay the interest and repayment of Bonds amounting to Rs 4453.85 Crs .</p> <p>The balance 50 % of restructured loan amounting to Rs 2450 Crs for two DISCOMs is the commitment of DISCOMs.</p>
--	--	--	--	---

			power purchase liabilities.	
		2	<p><i>The Licensee prays that the Honourable Commission permits the recovery of cost of servicing interest and principal through tariffs as and when principal repayment of loan commences.</i></p>	<p>The FRP loans pertain to the loans which have been raised to liquidate the outstanding working capital loans and outstanding power purchase liabilities. The power purchase cost has already been allowed in the ARR Orders of past years. Similarly, the Tariff Regulations provide for a normative working capital and interest thereon.</p> <p>Any further claims towards FRP loans are extraneous to the Tariff Regulations.</p> <p>Any claims towards FRP loans would tantamount to double allowance of the same claims; as such amounts have already been allowed in the past in the ARR.</p>
		3	<p><i>As the Licensee is not claiming a separate true-up for the years prior to 2013-14 and as the above short term liability is not part of the asset base on which the Licensee earn the return, Licensee need to recover the above interest cost through</i></p>	<p>The Licensee is obligated to file final true up petitions for the second control period i.e., FY 2009-10 to 2013-14. The Licensee cannot be allowed to claim interest on FRP loans in lieu of failure to file the true up petitions for FY 2009-10 to</p>

		<p><i>tariffs. The annual interest cost for the short-term loan is Rs 141 cr.</i></p> <p><i>The Licensee prays that the Honourable Commission allows the licensee to recover the above interest cost through tariffs.</i></p>	<p>2012-13.</p> <p>The Hon'ble Commission is urged to direct the Licensee to immediately file the True up Petition for all the years of the second control period i.e., FY 2009-10 to 2013-14.</p> <p>It is well settled in law that any item is eligible to be included in tariff to be charged from the consumers, if the consumers have reaped the benefit out of such expenditure.</p>	
	4	<p><i>The Licensee prays that the Honourable Commission allows the Licensee to claim the true-up for distribution business for FY 2013-14 in the next retail supply filing.</i></p>	<p>Tariff Policy states:</p> <p><i>“Once the revenue requirements are established at the beginning of the control period, the Regulatory Commission should focus on regulation of outputs and not the input cost elements. At the end of the control period, a comprehensive review of performance may be undertaken.</i></p> <p><i>Uncontrollable costs should be recovered speedily to ensure that future consumers are not burdened with past costs.”</i></p>	

			<p>The Licensee is obligated to immediately file a petition for true up for distribution business for all the years of the second control period i.e., FY 2009-10 to 2013-14 immediately in terms of the Tariff Policy and the Tariff Regulations. It is urged that the Licensee should not be permitted to delay the filing of the true up petition for distribution business.</p>	
	<p>Carrying Cost – Regulation 10.5 of the Tariff Regulations provide:</p> <p><i>“Provided that the Commission shall allow the financing cost on account of the time gap between the time when the true-up becomes due and when it is actually allowed and the corrections shall not be normally revisited.”</i></p> <p>The Objector submits that the Licensee should refund to the consumers the excess tariff recovered corresponding to the trued-down revenue gap for FY 2013-14 along with interest at 1.20 times of the Base rate + 350 basis points.</p> <p>In view of the above submissions, the Objector submits that as per its assessment, the consumers are entitled for a refund of Rs.5,112.37 crore (plus carrying cost) as against a true-up of Rs. 729.52 crore submitted by the TSSPDCL for FY 2013-14. The Objector’s assessment of the revenue gap for FY 2013-14 based on audited accounts is provided in the table below:</p> <p>Table: Objector’s Assessment of the Trued up Revenue Gap for FY 2013-</p>		<p>In the current scenario where the licensee is saddled with losses of previous years, the question of licensee gaining on revenue recovered as true-down in 2013-14 doesn’t arise.</p> <p>Further the licensee as filed for the revenue gap in FY 2013-14 for true-up, and the licensee prays that the Hon’ble Commisison accepts the filing of licensee which has loss of revenue due to adverse sales mix.</p>	

14 for TSSPDCL

ARR Line Item (Rs Crore)	Approved in Tariff Order	Actual as per Audited Accounts	Allowable as per Objector's Assessment
Distribution Cost	890.88	890.88	890.88
Distribution Cost	1699.69	1804.66	104.97
Transmission Charges	649.53	649.53	0.00
SLDC Charges	19.18	19.18	0.00
PGCIL & ULDC charges	208.28	277.32	69.04
Network and SLDC Cost	2576.68	2750.69	174.01
Power purchase	15129.47	13552.00	-1577.47
Interest on Consumer Security Deposits	180.37	175.90	-4.47
Supply margin in Retail Supply Business	11.69	13.94	2.25
Other Costs if any	0.15	0.52	0.37
Supply Cost	15321.68	13742.36	-1579.32
Aggregate Revenue Requirement	17898.36	16493.05	-1405.31
Revenue from Tariff	16172.86	14120.48	-2052.38
Non-Tariff Income	98.00	15.66	-82.34
Tariff Subsidy	1627.48	1627.48	0.00
Total Revenue	17898.34	15763.62	-2134.72
Total Gap/(Surplus) from Retail Business (A)	0.00	729.52	729.52
Adjustments as per Objector's Assessment: (B)			
(i) Truing up of income from Delayed Payment Charges			387.96
(ii) Disallowance of Supply Margin claimed			13.94
(iii) Add-back of Under Recovery on account of adverse			1054.73

<table border="1"> <tr> <td>consumer sales mix</td> <td></td> </tr> <tr> <td>(iv) Disallowance of FRP Interest</td> <td>140.88</td> </tr> <tr> <td>(v) Additional Subsidy Requirement from State Govt.</td> <td>4244.38</td> </tr> <tr> <td>Re-stated Revenue Gap / (Surplus) from Retail Business in FY 2013-14: (A-B)</td> <td>-5112.37</td> </tr> </table> <p><i>Note: Including expenses pertaining to Ananthapur and Kurnool Districts</i></p>	consumer sales mix		(iv) Disallowance of FRP Interest	140.88	(v) Additional Subsidy Requirement from State Govt.	4244.38	Re-stated Revenue Gap / (Surplus) from Retail Business in FY 2013-14: (A-B)	-5112.37																	
consumer sales mix																									
(iv) Disallowance of FRP Interest	140.88																								
(v) Additional Subsidy Requirement from State Govt.	4244.38																								
Re-stated Revenue Gap / (Surplus) from Retail Business in FY 2013-14: (A-B)	-5112.37																								
<p>16 TRUE UP OF TSSPDCL FOR FY 2014-15</p> <p>The Petitioner has claimed a true up of Rs. 1,283.56 crore attributable to the erstwhile APCPDCL, excluding the expenses pertaining to Ananthapur and Kurnool districts for the months of April and May 2014, which were transferred to APSPDCL at the time of state bifurcation. As against this, the overall true up for TSSPDCL including the expenses pertaining to Ananthapur and Kurnool for the months of April and May 2014, is to the tune of Rs. 1,249.45 crore for FY 2014-15 as depicted in the table below:</p> <p>Table: True up Claimed by TSSPDCL for FY 2014-15 including expenses pertaining to Ananthapur and Kurnool Districts for the months of April and May 2014</p> <table border="1"> <thead> <tr> <th>ARR Line Item (Rs Crore)</th> <th>Approved in Tariff Order</th> <th>Revised Estimates</th> <th>Deviation</th> </tr> </thead> <tbody> <tr> <td>Distribution Cost</td> <td>1699.69</td> <td>1575.46</td> <td>-124.23</td> </tr> <tr> <td>Transmission Charges</td> <td>649.53</td> <td>650.44</td> <td>0.91</td> </tr> <tr> <td>SLDC Charges</td> <td>19.18</td> <td>25.79</td> <td>6.61</td> </tr> <tr> <td>PGCIL & ULDC charges</td> <td>208.28</td> <td>186.89</td> <td>-21.39</td> </tr> <tr> <td>Network and SLDC Cost</td> <td>2576.68</td> <td>2438.58</td> <td>-138.10</td> </tr> </tbody> </table>	ARR Line Item (Rs Crore)	Approved in Tariff Order	Revised Estimates	Deviation	Distribution Cost	1699.69	1575.46	-124.23	Transmission Charges	649.53	650.44	0.91	SLDC Charges	19.18	25.79	6.61	PGCIL & ULDC charges	208.28	186.89	-21.39	Network and SLDC Cost	2576.68	2438.58	-138.10	<p>The licensee in its filing has shown clearly the true-up including ATP & Kurnool and the true-up excluding ATP and Kurnool.</p> <p>With a view of not burdening the consumers in TSSPDCL licensee area with true-ups of Atp & Kurnool, the licensee has claimed the true-up of TSSPDCL licensee area only.</p> <p>The Hon'ble Commission may instruct a suitable mechanism for transferring the true-up of Atp & Kurnool from TSSPDCL books of accounts to APSPDCL.</p>
ARR Line Item (Rs Crore)	Approved in Tariff Order	Revised Estimates	Deviation																						
Distribution Cost	1699.69	1575.46	-124.23																						
Transmission Charges	649.53	650.44	0.91																						
SLDC Charges	19.18	25.79	6.61																						
PGCIL & ULDC charges	208.28	186.89	-21.39																						
Network and SLDC Cost	2576.68	2438.58	-138.10																						

Power purchase	15129.47	14046.05	-1083.42
Interest on Consumer Security Deposits	180.37	183.71	3.34
Supply margin in Retail Supply Business	11.69	8.01	-3.68
Other Costs if any	0.15	0.00	-0.15
Supply Cost	15321.68	14237.77	-1083.91
Aggregate Revenue Requirement	17898.36	16676.35	-1222.01
Revenue from Tariff	16172.86	13767.25	-2405.61
Non-Tariff Income	98.00	13.04	-84.96
Tariff Subsidy	1627.48	1646.62	19.14
Total Revenue	17898.34	15426.91	-2471.43
Total Gap / (Surplus) from Retail Business	0.00	1249.45	1249.45

It is stated that the expenses pertaining to the Ananthapur and Kurnool districts for the months of April and May 2014, ought not to be excluded from the Revenue Gap for FY 2014-15, as the truing up is to be done at the Licensee level i.e., TSSPDCL (erstwhile APCPDCL). It is also pertinent to mention that the APSPDCL has not filed a separate true up for Ananthapur and Kurnool districts for the months of April and May 2014. Hence, the consumers cannot be deprived of the legitimate truing up which they are entitled to, as per the terms of the Tariff Regulations.

In view of the above, it is stated that the truing up exercise may be done at the licensee level for FY 2014-15 as the districts of Ananthapur and Kurnool were part of TSSPDCL (erstwhile APCPDCL) in the months of April and May 2014.

1) Power Purchase Cost – The following table depicts that the power purchase cost per unit computed by the Licensee in the current petition has increased by 15.5% in FY 2014-15 and then has tapered by around 2.8% in the ensuing year FY 2015-16.

Table: Power Purchase Cost Estimated of TSSPDCL

Particulars	2013-14		2014-15	2015-16
	Tariff Order	Actuals	Revised Estimates	ARR
Power Purchase (MU)	40498.79	39125.35	35123.56	37624.03
Power Purchase Cost (Rs Crore)	15129.47	13552.00	14046.05	14631.13
Power Purchase Cost (Rs/kWh)	3.74	3.46	4.00	3.89
Year on Year Increase (%)			15.5%	-2.8%

The Objector submits that the power purchase cost for FY 2014-15 seems to be an aberration in view of the power purchase prices incurred in FY 2013-14 and the estimates for FY 2015-16.

a. Generation Tariff Order for FY 2009-14 period not given effect to – The erstwhile Regulatory Commission had approved the tariff of APGENCO stations for the period 01.04.2009 to 31.03.2014 vide its Order dated 31.05.2014. **The tariff approved for the APGENCO stations in the said Order was less than the provisional tariff allowed in the Retail Tariff Orders by Rs.**

Source wise power purchase cost information has been provided in the RSF

TSDISCOMS have considered Bilateral purchases at average

Rate of Rs 6.00/Unit considering it is expected to get power from generators located within Telangana, within SR and outside SR.

Price variation on IEX is very dynamic and it cannot be taken as an indicator for fixing the ceiling price of short term purchases

TSDISCOMS request the Hon'ble Commission to fix the bilateral power purchase cost considering the power contracted with generators

2,081.81 crore. As the APGENCO had already billed the Discoms based on the provisional tariff approved in the Retail Tariff Orders; the Commission had held that APGENCO should reimburse the Discoms towards the excess recovery to the tune of Rs. 2,081.81 crore. In view of the above, the Commission had directed the APGENCO to adjust the difference between the tariff already collected from the Discoms and the tariff approved in the said Order dated 31.05.2014 within a period of six months i.e., before 31.12.2014. Thus, due adjustment towards the refund was to be made in FY 2014-15.

The relevant extracts of the said Order is reproduced below:

“The tariff approved now is less than that provisional tariff allowed in the Retail Tariff Orders by Rs.2081.81 Crs. APGENCO has already been billing the DISCOMs based on the provisional tariff approved in the Retail Tariff Orders. APGENCO should reimburse DISCOMs to this extent. The Commission recognizes that the bills already raised by APGENCO on DISCOMs may be less than the tariff provisionally approved in the respective Retail Tariff Orders due to network factors like delay in Commissioning of the new power plants. Therefore, the Commission directs APGENCO to adjust the difference between the Tariff already collected from DISCOMs and the Tariff approved now as per clause 8.3 of Regulation 1 of 2008 within a period of six months i.e. before 31.12.2014.” (Emphasis supplied)

Thus, the consumers are entitled for a refund of Rs. 2,081.81 crore towards the excess power purchase cost claimed by the Discoms over the second control period. The Objectors submits

that the Distribution Licensee has not provided for such refund in the true up being claimed in the subject petition for FY 2014-15. It is a gross violation of the directions of the Hon'ble Commission given in the Order dated 31.05.2014. It is urged that the Hon'ble Commission may pass the necessary adjustment along with carrying cost towards the refund entitlement of the consumers as detailed above.

b. Source wise Power Purchase Cost for full year 2014-15 has not been provided

The Objector submits that the Licensee has not provided the source wise power purchase cost for full year 2014-15 in view of which, any prudence check and comparative analysis is not possible. It is urged that the Hon'ble Commission may direct the Licensee to submit the full year details of source wise power purchase cost for FY 2014-15.

c. Bilateral and Market Purchases

The TSSPDCL has projected that along with TSNPDCL it would procure around 9,123 MU in FY 2014-15 from bilateral and market sources at an average procurement cost of Rs. 6.00 per unit.

The Objector submits that there seems to be a gap between the availability and requirement because the licensees have projected lower availability from APGENCO and TSGENCO stations and higher sales. In the opinion of the Objector, the Commission would disallow such aberrations and there would either be no gap between availability and requirement or the gap would be much tapered. Further, the proposed price for bilateral and market purchases seems to be unreasonably high considering the recent trends in the price of power traded in open market and exchanges.

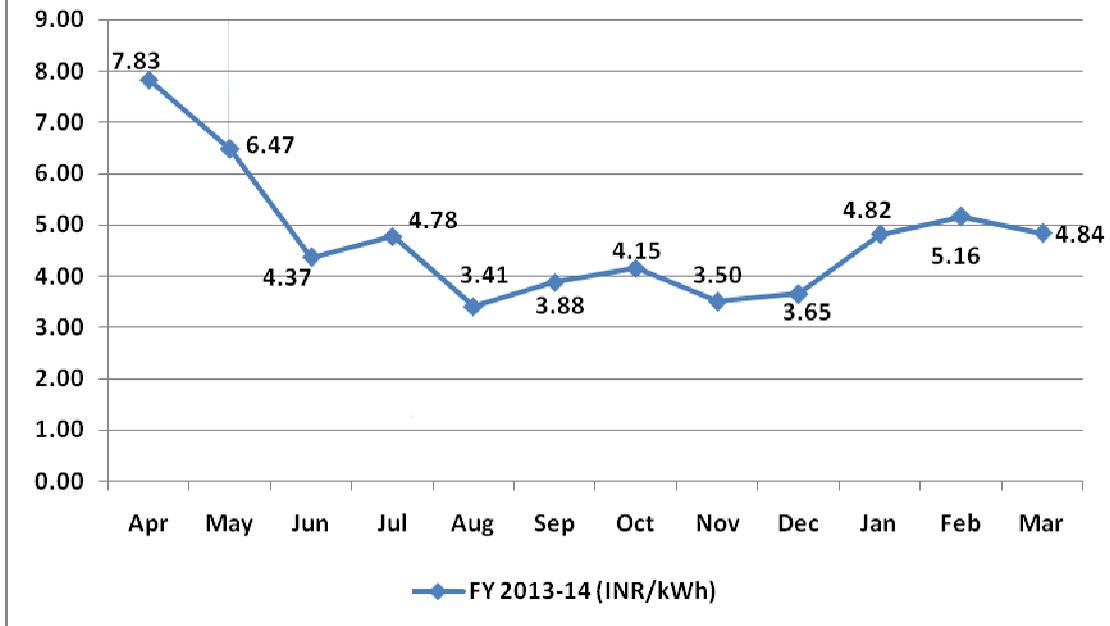
The Hon'ble Commission in the Tariff Order for FY 2013-14 had

approved a maximum ceiling purchase price of Rs. 6.11 per unit (as against the Petition of Rs. 5.11 per kWh made by the licensee) through short term sources considering the rates prevalent on the open market and exchanges in FY 2012-13.

However, the rates in the open market and power exchanges had crashed in FY 2013-14. The prices prevailing on the IEX power exchange (which has a market share of around 97%) is one of the best indicators of the prices prevailing on the short term market.

The graph below depicts that the power prices have ranged between Rs. 3.50 per unit to Rs. 4.75 per unit, with the 12 month average (Apr to March 2014) at around Rs. 4.74 per unit.

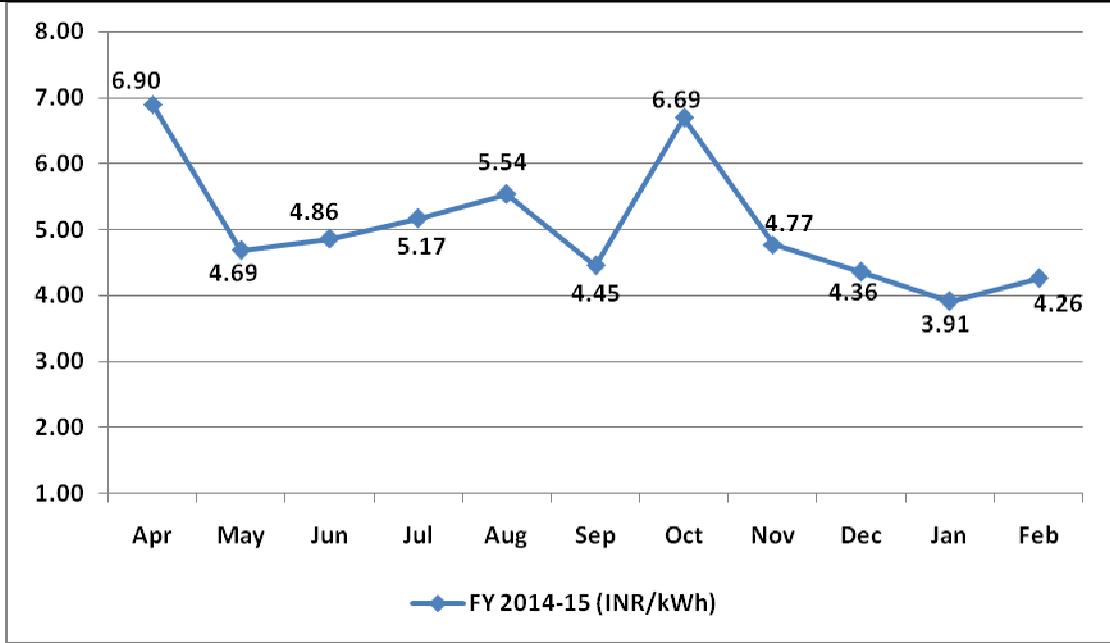
Graph: Average Prices Prevailing on IEX in FY 2013-14 (Apr 2013 - March 2014)



Source: IEX; S1 region - Andhra Pradesh, Karnataka, Pondicherry (Yanam), South Goa

Further, in the current year, the power prices have ranged between Rs. 3.91 per unit to Rs. 5.17 per unit, with the 11 month average (Apr to Feb 2015) at around Rs. 5.06 per unit.

Graph: Average Prices Prevailing on IEX in FY 2014-15 (Apr'14 - Feb'15)



Source: IEX; S1 region - Andhra Pradesh, Karnataka, Pondicherry (Yanam), South Goa

Further, the PGCIL has recently commissioned the first of the two 765 Kilo Volt (KV) Alternating Current (AC) power lines between Sholapur in Maharashtra (western region) and Raichur in Karnataka (southern region), thus integrating the southern grid with the northern grid and ending the decades of isolation of the southern region's four states – Andhra Pradesh, Karnataka, Tamil Nadu and Kerala – from the national grid.

The new transmission capacity would further bring down power prices in the southern region in the long run as it would change the supply-demand situation.

	<p>Considering the above, it is humbly prayed that the maximum ceiling may be fixed at or below Rs. 5.06 per unit as against Rs. 6.00 per unit projected by the TSSPDCL. Thus, a disallowance of Rs. 857.56 crore is {9,123 MU x (Rs 6.00 per unit minus Rs. 5.06 per unit)} proposed towards market and bilateral purchases in FY 2014-15 in respect of TSNPDCL and TSSPDCL. In the absence of the Licensee wise break-up of the bilateral and market purchases in FY 2014-15, the Objector has allocated the proposed disallowance in the proportion of the overall power purchase ratio. Thus, a disallowance of Rs.248.63 crore is attributable to TSNPDCL and Rs. 608.93 crore is attributable to TSSPDCL.</p>	
	<p>2) Supply Margin - The Licensee has claimed Rs. 8.01 crore in FY 2014-15 towards Supply Margin. The Objector states that there is no provision for allowance of Supply Margin in the Tariff Regulations approved by the Hon'ble Commission. It is urged that the ARR and Tariff should be determined strictly in accordance with the Tariff Regulations and any extraneous claims should be disallowed.</p>	<p>As per Wheeling tariff order for the period 2009-2014, Hon'ble Commission had allowed for a Return on Equity of 16%, allowing 14% in Distribution business and 2% in the Retail Supply business. The licensee has followed the same approach in this Retail ARR filings by considering 2% return on Equity as the supply margin</p>
	<p>3) Estimates of Realisation per unit have dropped – The Hon'ble Commission in the Tariff Order for FY 2013-14 had approved an overall realisation rate of around Rs. 4.77 per unit for TSSPDCL. As against this, the actual realisation rate has been stated by TSSPDCL to be Rs. 4.44 per unit in FY 2013-14 and has been projected to be at Rs. 4.69 per unit in FY 2014-15.</p> <p>The commercial and LT and HT industrial consumers are most affected due to change in sales mix. Due to the lower allocation of power, the commercial and LT and HT industrial consumers are not able to meet their power requirement. The Objector requests the Hon'ble Commission</p>	<p>The average realization is dependent on the sales mix and sales mix changes across years due to the policy environment, other business and socio-economic factors.</p> <p>While projecting sales for FY 2015-16, the discoms have considered the above factors as well as the level of load shedding, in previous year. The discoms pray that the Hon'ble Commission provides a mechanism to address the under-recovery of revenue due to adverse sales mix.</p>

	<p>to direct the Licensee to at least maintain the sales mix approved by the Commission in the Tariff Order for FY 2013-14. The Petitioner wants to highlight the fact that increase in sales to lower tariff consumers while decreasing the sales mix to higher tariff consumers is the main reason for lower revenue realization. Due to the lower revenue realization, the Licensee is seeking the approval of the Hon'ble Commission for truing up of the revenue gap pertaining to shortfall in revenue. It will be the subsidizing consumers such as commercial and LT and HT Industrial consumers that will be most affected in the form of increased tariffs due to truing up of this revenue shortfall.</p> <p>The adverse consumer sales mix has led to under recovery of revenue to the tune of Rs. 215.15 crore ((29334.44 MU x Rs. 4.77 per unit / 10) minus (13,767.26 crore)). The Objector urges that consumer sales mix is not classified as an 'uncontrollable factor' as per the Terms of the Tariff Regulations and hence the Licensee has to absorb the burden of under recovery on account of adverse consumer sales mix without levying any burden on this account on the consumers.</p>	
	<p>4) Non Tariff Incomes – The Licensee has submitted the details of Non Tariff Incomes in Form 6 and Form 11 of the Tariff Forms published along with the subject petitions. The TSSPDCL has submitted the non tariff incomes to be Rs. 13.04 crore for FY 2014-15. However, the said figure is not comparable with the non tariff incomes earned by the Licensee in past years. The Hon'ble Commission is requested to conduct a strict prudence check and approve non tariff incomes such that they are relatable to past years. Further, it is stated that the delayed payment charges for the H1 FY 2014-15 ought to be reduced from the revenue gap of FY 2014-15.</p>	<p>The licensee has estimated the Non-tariff income as per audited annual accounts only after excluding non-operating incomes and incomes generated through internal efficiency</p>

5) True up of State Government Subsidy based on actual consumption of subsidised categories – As discussed in the foregoing section titled “State Govt. Subsidy”, the following category of consumers were subsidised in FY 2014-15 by the State Government:

- LT-I(A): Consumers with monthly consumption 50 units;
- LT-I(B): Consumers with monthly consumption more than 50 and up to 100 units;
- LT-I(B): Consumers with monthly consumption more than 100 and up to 200 units and
- LT-V consumers.

The Hon’ble Commission in the FY 2013-14 Tariff Order had determined the cost of service of LT-1(A), LT-1(B) and LT-5 categories based on the embedded cost of service model. Considering the approved cost of service of the subsidised categories and the revised estimated sales in FY 2014-15, the adjusted revised subsidy requirement has been worked out in the table below:

Table: Adjusted Subsidy Requirement in FY 2014-15 as per Estimated Sales

Consumer Categories	Energy Sales	Approved CoS	Cost to Serve	Estimated Revenue Assessment	Subsidy Requirement
	MU	Rs/kWh	Rs Crore	Rs Crore	Rs Crore
	A	B	C = AxB/10	D	E = C - D

The Licensee has claimed True-up/True-down based on the audited annual accounts as per the Regulation 4 of 2005 and requests the Honble Commission to pass the aggregate gains/losses accordingly as per the above said regulation.

LT- I(A) Domestic - up to 50 units/month	513.06	6.48	332.46	202.51	129.95
LT- I(B) Domestic - >50 and 100 units/month	1129.8 3	6.48	732.13	264.24	467.89
LT- I(B) Domestic- above 100 & 200 units/month	2160.1 6	6.48	1399.78	687.34	712.44
LT-V	7617.7 2	4.71	3587.95	46.73	3541.22
Total	11420. 77		6052.32	1200.82	4851.50

The additional subsidy requirement from State Govt.towards supply to LT-1(A), LT-1(B) and LT-V categories is to the tune of apprx Rs. 3,204.88 crore for TSSPDCL as depicted in the table below:

Table: Additional Subsidy Requirement from State Govt. for FY 2014-15

Particulars	(Rs Crore)
Subsidy Requirement of LT-1(A) and LT-1(B)	1310.29
Subsidy Requirement of LT-V	3541.22
Total Subsidy Requirement	4851.50
Less: State Govt. Subsidy as per audited accounts	1646.62
Additional Subsidy Requirement from State Govt.	3204.88

<p>The Objector has elaborated in the foregoing sections that the Hon'ble Commission should re-adjust the level of subsidy from State Govt. based on actual consumption levels such that the cost of supplying subsidised power to select consumer categories is not borne by the subsidising consumers in terms of the provisional true up of the revenue gap of FY 2014-15. It is urged that the Hon'ble Commission may direct TSSPDCL to collect the additional subsidy amount to the tune of Rs. 3,204.88 crore from State Govt. being the balance subsidy requirement for FY 2014-15 in view of the revised estimated sales to subsidised categories and necessary adjustment may be made in the true-up / true-down being approved for the relevant year.</p>	
<p>6) Carrying Cost – Regulation 10.5 of the Tariff Regulations provide: <i>“Provided that the Commission shall allow the financing cost on account of the time gap between the time when the true-up becomes due and when it is actually allowed and the corrections shall not be normally revisited.”</i></p> <p>The Objector submits that the Licensee should refund to the consumers the excess tariff recovered corresponding to the trued-down revenue gap for FY 2014-15 along with interest at 1.20 times of the Base rate + 350 basis points.</p> <p>In view of the above submissions, the Objector submits that as per its assessment, the consumers are entitled for a refund of Rs. 2,787.52 crore (plus carrying cost) as against a true-up of Rs. 1,249.45 crore submitted by the TSSPDCL for FY 2014-15. The Objector's assessment of the revenue gap for FY 2014-15 based on audited accounts is provided in the table below:</p> <p>Table: Objector's Assessment of the Trued up Revenue Gap for FY 2014-15 for TSSPDCL</p>	<p>Firstly, approved tariff order cannot be used as a comparison as there is no tariff order for FY 14-15.</p> <p>On the adjustments proposed by the Objector</p> <ol style="list-style-type: none"> i. Purchase of power from Short term has been proposed by TSDISCOMS to ensure quality power on a 24X7 basis is supplied to the consumers in the state. Short term power would be required to the state at least till all the long term sources start supplying power to the state. Hence, this cost of power purchase cannot be avoided ii. Disallowance of Supply margin: As per Wheeling tariff order for the period 2009-2014, Hon'ble Commission had allowed for a Return on Equity of 16%, allowing 14% in Distribution business and 2% in the Retail Supply business. The licensee has followed the same approach in these Retail ARR filings by considering 2% return on Equity as the supply margin. iii. Under recovery due to change in sale mix: Adhering to

ARR Line Item (Rs Crore)	Approved in Tariff Order	Revised Estimates	Allowable as per Objector's Assessment
Distribution Cost	1699.69	1575.46	1575.46
Transmission Charges	649.53	650.44	650.44
SLDC Charges	19.18	25.79	25.79
PGCIL & ULDC charges	208.28	186.89	186.89
Network and SLDC Cost	2576.68	2438.58	2438.58
Power purchase	15129.47	14046.05	14046.05
Interest on Consumer Security Deposits	180.37	183.71	183.71
Supply margin in Retail Supply Business	11.69	8.01	8.01
Other Costs if any	0.15	0.00	0.00
Supply Cost	15321.68	14237.77	14237.77
Aggregate Revenue Requirement	17898.36	16676.35	16676.35
Revenue from Tariff	16172.86	13767.25	13767.25
Non-Tariff Income	98.00	13.04	13.04
Tariff Subsidy	1627.48	1646.62	1646.62
Total Revenue	17898.34	15426.91	15426.91
Total Gap / (Surplus) from Retail Business (A)	0.00	1249.45	1249.45
Adjustments as per Objector's Assessment: (B)			
(i) Disallowance of Power Purchase Cost from Bilateral and Market Sources			608.93
(ii) Disallowance of Supply Margin claimed			8.01
(iii) Add-back of Under Recovery on account of adverse consumer sales mix			215.15
(iv) Additional Subsidy Requirement from State Govt.			3204.88

the approved sales mix is not under the control of TSDISCOMS. Any true up/true down amount due to change in the sales mix needs to be recognised by the Hon'ble Commission.

- iv. Additional Subsidy requirement from Govt.: The additional amount of subsidy has to be determined by the Hon'ble Commission and is not under the purview of TSDISCOMS

In view of the above, TSDISCOMS request Hon'ble Commission to not consider the adjustments proposed by Objector

	Re-stated Revenue Gap /(Surplus) from Retail Business in FY 2014-15 (A-B)	-2787.52	
	<p><i>In addition to the above, the consumers are entitled for a refund of Rs. 2,081.81 crore towards the excess power purchase cost claimed by the Discoms over the second control period (FY 2009-14) along with carrying cost.</i></p>		
	<p>1. Treatment of the Revenue Gap - At the outset, it is stated that the Licensee has not suggested any mechanism to bridge the revenue gap. The subsidy provision from the State Govt has not been indicated. It is humbly stated that the tariffs be fixed for all consumer categories at cost of service levels or at $\pm 20\%$ of CoS levels. Thereupon the subsidised tariffs should be worked upon after considering the available subsidy levels from the State Government.</p>	<p>The revenue gap will be met through Govt subsidy and increase of Tariff</p>	
	<p>2. Supply Margin - The Licensee has claimed Rs. 8.61 crore in FY 2015-16 towards Supply Margin. The Objector states that there is no provision for allowance of Supply Margin in the Tariff Regulations approved by the Hon'ble Commission. It is urged that the ARR and Tariff should be determined strictly in accordance with the Tariff Regulations and any extraneous claims should be disallowed.</p>	<p>As per the Regulatory practice approved by the Hon'ble Commission, licensee is eligible for 16% return out of which 14% from distribution Business as RoE and remaining 2% as supply merging.</p>	
	<p>3. Power Purchase Cost –</p> <p>a. Share of Energy from RTPP Stage III & Damodaram Sanjeevaiah TPP I and II - The Objectors submits that the allocation of share of energy from RTPP Stage III and Damodaram Sanjeevaiah TPP I and II between Telangana and Andhra Pradesh is not clear as there are conflicting figures stated by the different</p>	<p>a. TSDISCOMS have projected the energy availability from various energy sources as per the AP Reorganization Act and G. O Ms No 20 and as per best estimates of parameters like coal availability, maintenance schedules, PLF etc. TSDISCOMS have projected Fixed cost and variable cost escalation based on information available and also</p>	

distribution licensees of the two states.

b. Power Purchase Quantum from APGENCO and TSGENCO stations – It is observed that the power procurement from certain APGENCO and TSGENCO stations has been considered on a conservative basis without any sound reasoning. The table below depicts that the PLF from thermal power stations namely Dr. NTPS II, Dr. NTPS III, Dr. NTPS IV, RTPP I, RTPP Stage II, RTPP Stage III and Kakatiya TPP Stage I totalling around 2890 MW have been projected to fall by around 2.79% to 15.40% as compared to the actual achieved PLF in FY 2014-15 (Jan 2015).

Table: Projected PLF of Select APGENCO & TSGENCO Stations

Source	Capacity MW	PLF in FY 2012-13	PLF in FY 2013-14	PLF in FY 2014-15 (Up to Jan'15)	PLF considered in FY 2015-16 (ARR Projections)
DR. NTPS II	420	93.17%	86.05%	81.55%	77.81%
DR. NTPS III	420	88.99%	85.36%	80.60%	77.81%
DR. NTPS IV	500	85.48%	86.32%	81.50%	73.60%
RTPP I	420	79.34%	71.33%	72.60%	64.88%
RTPP Stage-II	420	89.18%	81.80%	79.20%	64.35%
RTPP Stage-III	210	81.13%	77.34%	74.20%	58.80%
Kakatiya TPP Stage I	500	91.10%	72.00%	94.97%	82.57%

It is estimated that if the power purchase from aforementioned stations is projected at the PLF levels achieved in 2014-15, then it would lead to an additional availability of 714 MU from these

increases in coal cost.

TSDISCOMS have projected energy availability and power purchase cost totally independent of the method followed by APDISCOMS

- b. TSDISCOMS have considered Bilateral purchases at average Rate of Rs 6.00/Unit considering it is expected to get power from generators located within Telangana, within SR and outside SR.
- c. Price variation on IEX is very dynamic and it cannot be taken as an indicator for fixing the ceiling price of short term purchases
- d. Keeping in view of the increase in cost of coal, increase in rail freight and diesel charges, TSSPDCL considered a conservative estimate of 2% escalation in the variable cost. TSDISCOMS request the Hon'ble Commission to accept this escalation in variable cost. Any deviations against the approved values would be adjusted in true up activity

seven stations alone, to TSSPDCL. This additional availability from APGENCO and TSGENCO stations would replace the costly purchase of power from bilateral purchases and reduce the ARR of the retail supply business.

c. Bilateral and Market Purchases -

The TSSPDCL along with TSNPDCL has projected that there would be a shortfall of around 2,249 MU based on the system availability and requirement. A part of this deficit would be met from external sources such as power traders and power exchanges. The TSSPDCL has projected an average procurement price of Rs. 6.00 per unit in FY 2015-16 for such bilateral and market purchases.

The Objector submits that there seems to be a gap between the availability and requirement because the licensee has projected lower availability from APGENCO and TSGENCO stations and higher sales. In the opinion of the Objector, the Commission would disallow such aberrations and there would either be no gap between availability and requirement or the gap would be much tapered. Further, the proposed price for bilateral and market purchases seems to be unreasonably high considering the recent trends in the price of power traded in open market and exchanges.

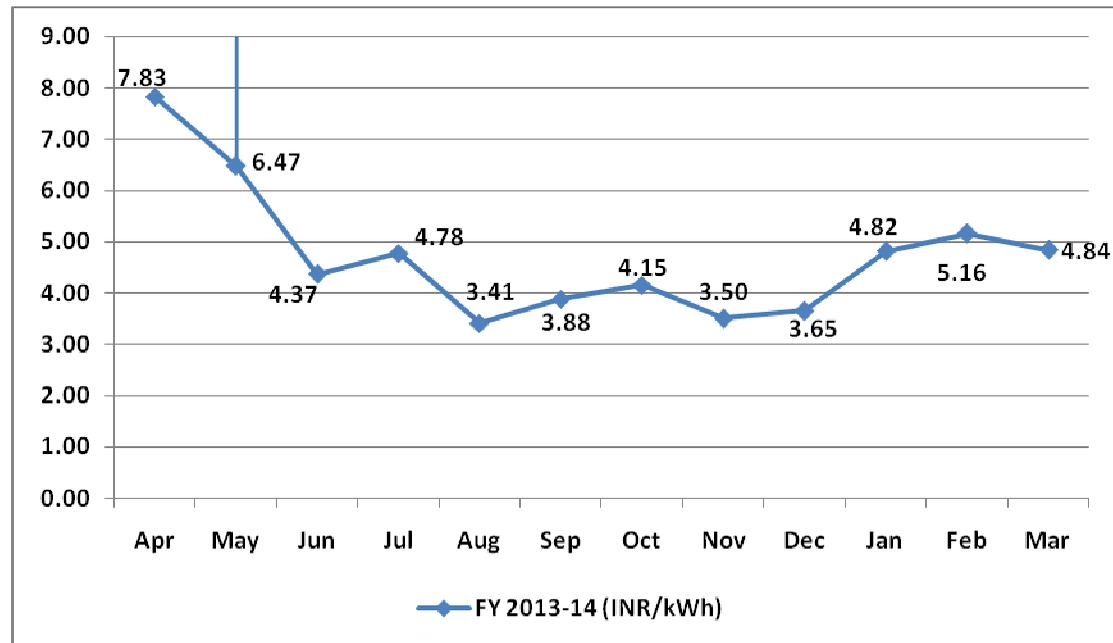
The Hon'ble Commission in the Tariff Order for FY 2013-14 had approved a maximum ceiling purchase price of Rs. 6.11 per unit (as against the Petition of Rs. 5.11 per kWh made by the licensee) through short term sources considering the rates prevalent on the open market and exchanges in FY 2012-13.

However, the rates in the open market and power exchanges had crashed in FY 2013-14. The prices prevailing on the IEX power

exchange (which has a market share of around 97%) is one of the best indicators of the prices prevailing on the short term market.

The graph below depicts that the power prices have ranged between Rs. 3.50 per unit to Rs. 4.75 per unit, with the 12 month average (Apr to March 2014) at around Rs. 4.74 per unit

Graph: Average Prices Prevailing on IEX in FY 2013-14 (Apr 2013 - March 2014)

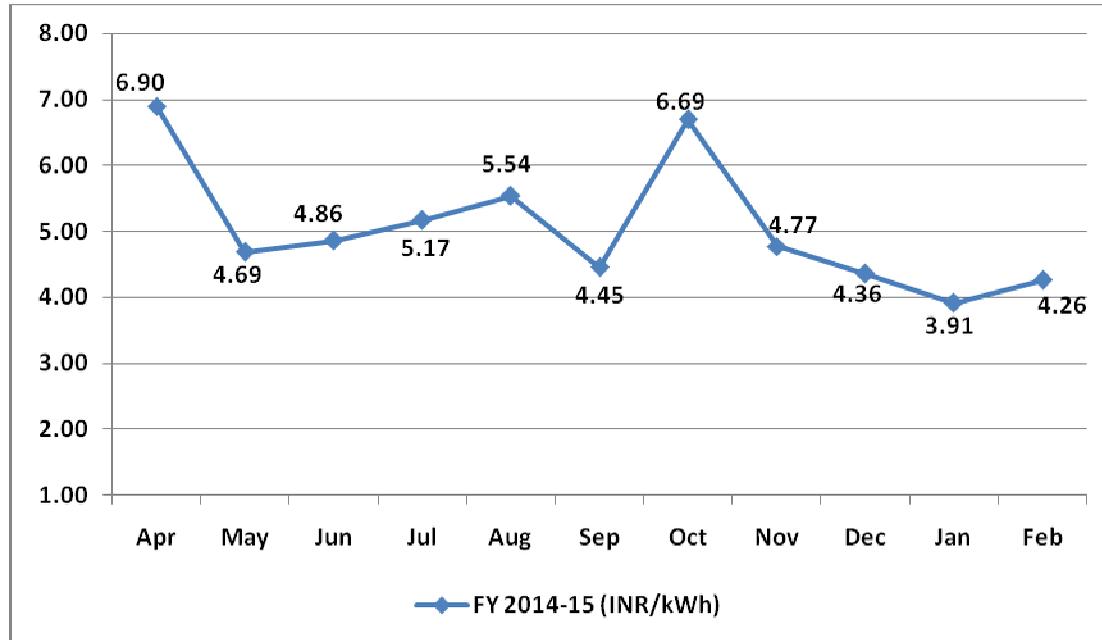


Source: IEX; S1 region - Andhra Pradesh, Karnataka, Pondicherry (Yanam), South Goa

Further, in the current year, the power prices have ranged between Rs. 3.91 per unit to Rs. 5.17 per unit, with the 11 month

average (Apr to Feb 2015) at around Rs. 5.06 per unit.

Graph: Average Prices Prevailing on IEX in FY 2014-15 (Apr'14 – Feb'15)



Source: IEX; S1 region - Andhra Pradesh, Karnataka, Pondicherry (Yanam), South Goa

Further, the PGCIL has recently commissioned the first of the two 765 Kilo Volt (KV) Alternating Current (AC) power lines between Sholapur in Maharashtra (western region) and Raichur in Karnataka (southern region), thus integrating the southern grid with the northern grid and ending the decades of isolation of the southern region's four states - Andhra Pradesh, Karnataka, Tamil

Nadu and Kerala – from the national grid.

The new transmission capacity would further bring down power prices in the southern region in the long run as it would change the supply-demand situation.

Considering the above, it is humbly prayed that the maximum ceiling may be fixed at or below Rs. 5.06 per unit as against Rs. 6.00 per unit projected by the TSSPDCL. Thus, there is a potential disallowance of Rs. 211.41 crore is {2,249 MU x (Rs 6.00 per unit minus Rs. 5.06 per unit)} proposed towards market and bilateral purchases in FY 2015-16 in respect of TSNPDCL and TSSPDCL. In the absence of the Licensee wise break-up of the bilateral and market purchases in FY 2015-16, the Objector has allocated the proposed disallowance in the proportion of the overall power purchase ratio. Thus, a disallowance of Rs.58.74 crore is attributable to TSNPDCL and Rs. 152.67 crore is attributable to TSSPDCL.

- d. Variable Costs** – For projecting the variable cost in FY 2015-16 for APGENCO and TSGENCO stations, NTPC stations, NLC stations and other generating stations, the Licensee has projected an escalation of 2% on the actual H1 FY 2014-15 variable cost per unit.

The power procurement cost based on escalation in the variable costs over and above the actual variable cost is not in line with the Tariff Regulations. Regulation No. 4 of 2005, “Terms and Conditions for Determination of Tariff for Wheeling and Retail Sale of Electricity”, Regulation 12 (4) Cost of Power Procurement provides for the following:

“The Distribution Licensee shall be entitled to recover or shall

	<p><i>refund, as the case may be, the charges on account of Fuel Surcharge Adjustment as approved by the Commission from time to time, suo-motu or based on the filing made by the Distribution Licensee, as the Commission may deem fit.”</i></p> <p>Section 45-B, of Regulation No.8, dated 28-08-2000 (abolished w.e.f 1.4.2013) provided for the Fuel Adjustment Formula. Subsequently, the Hon’ble Commission has approved the APERC (Terms and Conditions of Determination of Wheeling and Retail Supply of Electricity) First Amendment Regulations, 2014 with a view to provide the variation in power purchase cost for a tariff year, as an item cost in the succeeding year’s ARR relating to Retail Supply Business. Thus, power procurement cost based on escalation in the variable costs over and above the actual variable cost is not in line with the Regulations. Variable costs may not be considered on the presumptive basis of the licensee and may be based on actual. Any variation in fuel price was eligible to be adjusted through FSA mechanism 31.3.2013 and subsequently is to be allowed to be adjusted in the succeeding year’s ARR after the notification of the First Amendment to the Regulation No. 4 of 2005.</p> <p>In view of the above, the Objector’s assessment of the potential disallowance in the variable charges is to the tune of Rs. 138 crore.</p>	
	<p>4. Projected Sales – In the past, the Hon’ble Commission’s estimates of metered consumption have regularly fallen short against the actuals. Vice versa, the actual agricultural consumption which is subsidised has been more than the levels approved in the Tariff Orders leading to a potential change on the higher side in subsidy requirement levels. Higher consumption by subsidised LT agricultural category has led to</p>	<p>Sales projections are made as per the historical sales data, upcoming loads which will have large impact in the sales, anticipated economic & climatic conditions, Govt. policies on industry, etc. All these factors will not be under the control of the licensee. The licensee is projecting sales with the acceptable scientific methods. The DISCOMs have</p>

	<p>an increase in subsidy requirements and this need to be appropriately addressed by the Hon'ble Commission. In the ensuing year, the Hon'ble Commission is requested to approve the agricultural consumption more optimistically so that the deviation is more tapered.</p> <p>The Objector observes that the Licensee has been very optimistic in projecting the industrial and agricultural consumption growth for FY 2015-16 which has necessitated a demand supply gap and the need for short term costly power. Additionally, the connected load growth does not seem commensurate with the projected increase in electricity sales. A conservative increase in connected load projections directly impacts the demand charges and leads to lower revenue projections.</p> <p>The Hon'ble Commission is duly requested to conduct a strict prudence check and approve energy sales based on realistic numbers and not just rely on the projections of the Licensee.</p>	<p>projected the sales keeping in view of the economic condition of the districts after the bifurcation, increasing industrial activity, focus of new government on industries and commercial activities, expected shifting of investments to Andhra Pradesh. The government is focused to provide 24x7 supply of power to all consumers. Therefore, there will be no load restriction and projected unrestricted sales.</p>
	<p>5. Non Tariff Incomes - The Licensee has submitted the details of Non Tariff Incomes in Form 6 and Form 11 of the Tariff Forms published along with the subject petitions. The TSSPDCL has submitted the non tariff incomes to be Rs. 35.01 crore for FY 2015-16. However, the said figure is not comparable with the non tariff incomes earned by the Licensee as per audited accounts of past years. The Hon'ble Commission is requested to conduct a strict prudence check and approve non tariff incomes such that they are relatable to past years.</p>	<p>The licensee has estimated the Non-tariff income as per audited annual accounts only after excluding non-operating incomes and incomes generated through internal efficiency.</p>
	<p>6. State Government Subsidy Requirement in FY 2015-16 - As discussed in the foregoing section titled "State Govt. Subsidy", the following category of consumers are subsidised by the State Government:</p>	<p>The Licensee has claimed True-up/True-down based on the audited annual accounts as per the Regulation 4 of 2005 and requests the Honble Commission to pass the aggregate gains/losses accordingly as per the above said</p>

- LT-I(A): Consumers with monthly consumption 50 units;
- LT-I(B): Consumers with monthly consumption more than 50 and up to 100 units;
- LT-I(B): Consumers with monthly consumption more than 100 and up to 200 units and
- LT-V consumers.

Based on the projected sales for FY 2015-16, revenue realisation and cost to serve computed by the Licensee, the subsidy requirement towards supply of subsidised power to select consumer categories is to the tune of Rs. 6,158.67 crore.

Table: Subsidy Requirement in FY 2015-16 based on Projected Sales for TSSPDCL

Consumer Categories	Energy Sales	Approved CoS	Cost to Serve	Projected Revenue Assessment	Subsidy Requirement
	MU	Rs/k Wh	Rs Crore	Rs Crore	Rs Crore
	A	B	$C = \frac{A \times B}{10}$	D	$E = C - D$
LT- I(A) Domestic - up to 50 units/month	510.66	6.71	342.65	171.25	171.40
LT- I(B) Domestic - >50 and up to 100 units/month	1184.34	6.71	794.69	263.97	530.72
LT- I(C) Domestic- above 100 & up to 200 units/month	2328.95	6.71	1562.73	731.40	831.33

regulation.

LT-V	7528.1 9	6.20	4667.48	42.26	4625.22
Total	11552.14		7367.55	1208.88	6158.67

Thus, considering the projected sales for FY 2015-16, there is a subsidy requirement of Rs. 6,158.67 crore from the State Government.

The Objector has demonstrated in the foregoing sections that the industrial consumers have been unduly burdened to make good the loss incidental to supply of electricity to subsidised consumers. It is the prerogative of the State Government to provide subsidised power to certain consumer categories. However, the burden of the loss should not be disproportionately loaded on to the industrial consumers. In view of the above, the Objector humbly requests the Hon'ble Commission to determine the subsidy requirement as per the Objector's assessment and insulate the industrial consumers from the burden of subsidy.

In view of the above submissions, the Objector submits that as per its assessment, the consumers are entitled for a refund / tariff reduction of Rs. 10,845.23 crore in FY 2015-16. The Objector's assessment of the allowable ARR for FY 2015-16 is provided in the table below:

Table: Objector's Assessment of the Allowable ARR for FY 2015-16 for TSSPDCL

ARR Line Item (Rs Crore)	Projected	Allowable as per Objectors Assessment
Distribution Cost	1647.94	1647.94
Transmission Charges	820.55	820.55
SLDC Charges	26.41	26.41
PGCIL & ULDC charges	274.06	274.06
Network and SLDC Cost	2768.96	2768.96

Power purchase	14631.13	14631.13
Interest on Consumer Security Deposits	203.42	203.42
Supply margin in Retail Supply Business	8.61	8.61
Other Costs	1262.70	1262.70
Supply Cost	16105.86	16105.86
Aggregate Revenue Requirement	18874.82	18874.82
Revenue from Tariff	15327.02	15327.02
Non-Tariff Income	35.01	35.01
Net Gap	3512.79	3512.79
Revenue from Proposed Tariff	825.61	No Tariff Hike Required
Total Gap/(Surplus) from Retail Business (A)	2687.18	3512.79
Adjustments as per Objector's Assessment: (B)		
(i) Disallowance of Bilateral and Market Purchases		152.67
(ii) Disallowance in Variable Charges (Power Purchase)		138.00
(iii) Disallowance of Supply Margin		8.61
(iv) Subsidy Requirement from State Govt.		6158.67
(v) True-down for FY 2013-14 as per Objector's Assessment		5112.37
(vi) True-down for FY 2014-15 as per Objector's Assessment		2787.52
Re-stated Revenue Gap/(Surplus) from Retail Business in FY 2015-16 (A-B)		-10845.05
<i>In addition to the above, the consumers are entitled for a refund of Rs. 2,081.81 crore towards the excess power purchase cost claimed by the Discoms over the second control period (FY 2009-14) along with carrying cost.</i>		

S.No	Summary of Objections / Suggestions	Response of the Licensee
	129. The Chief General Manager, Coal & Commercial, AP GENCO, Vidyut Soudha, Hyderabad	
1	The following objections are made on the power purchase cost proposed for APGENCO station for the FY 2014-15 and FY 2015-16 As per the PPA, clause 3.1.2 (C) “ interest on pension bonds over and above specified in the Annexure (I) of the APERC PPA order dt 24.03.2003 shall be allowed as pass through in tariff of APGENCO on year to year basis. i.e. over and above scheduled interest in pension bonds.	The interest on pension bonds can be approved by the Hon’ble ERC after authentication of claims from time to time . And Regulation may be formulated to regulate the expenditure incurred by the Genco towards on pension bonds.
2	As per APERC order dt 24.03.2003, APERC order on OP No.27/2006 and OP No. 4 of 2007 interest on pension bonds over and above schedule was allowed as a pass through in tariff of AP GENCO	Hon’ble ERC is requested to formulate a prudent method and authentication of payments on interest on pension bonds claimed by APGENCO instead allowing the claim proposed by APGENCO
3	APDISCOMS in their tariff filings for the year 2015-16 made provision of Rs 327 Cr towards fixed costs for Dr NTTPS O&M and Rs 174 Crs towards fixed costs for RTPP Stage I for 46.11% of consumption, including interest on pension bonds over and above schedule amounting to Rs 90.59 Crs and Rs 62.91 Crs respectively.	This is a statement on filing of APDISCOMs – TSDISCOMs have no Comments to offer on the method adopted by APDISCOMs .
4	TSSPDCL nad TSNPDCL needs to provide Rs 382.17 Crs and Rs 203.36 Crs towards fixed cost of Dr NTTPS O&M and RTPP stage I for consumption of 53.89% including interest on pension bonds. As per tariff filings of TSSPDCL and TSNPDCL only Rs 277.56Cr towards Dr NTTPS O&M and Rs 130.33 Crs towards RTPP stage I was provided. The reason for short provision is due to non inclusion of interest on pension bonds	The Hon’ble ERC may take view on considering this cost by adopting prudent estimate before allowing interest on pension bonds.

	over and above the scheduled interest.	
5	The reason for non inclusion of interest on pension bonds over and above schedule even though provision was made in PPA is not known	There is no specific regulation with respect to the claim of interest on pension bonds over and above scheduled interest.
6	It is requested to include interest on pension bonds over and above schedule even amounting to Rs 105.88 Crs and Rs 73.52 Crs provisionally in the fixed cost of Dr NTPS O&M and RTPP stage I on par with APDISCOMS.	The above request under purview of Hon'ble ERC

S.No	Summary of Objections / Suggestions	Response of the Licensee
	130.PVYN Somayajulu, General Maaager (F&A), The India Cements Limited, Vishnupuram, Wadapally (P), NAlgonada District-508355	
1.	<p>We are one of the biggest HT consumers (NLG-162) in Nalgonda Circle and wish to bring to your kind notice the following points for consideration in the Power Tariff Rates, Terms and Conditions for 2015-16.</p> <p>The cement industry as such is not in a position to absorb the hike of Demand and Energy charges proposed in the Tariff Schedule announced for 2015-16. Therefore, may please retain the existing tariff of 2014-15.</p>	<p>Due to the increase in average cost of service from Rs 5.25/Unit as approved in Tariff Order 2013-14 to Rs. 5.90/Unit as filed in ARR for FY 2015-16 for TSPDCL, the Licensee is obligated to increase Tariff nominally for FY 2015-16.</p> <p>The increase in CoS is mainly because of increase in Power Purchase cost, increased Network Cost, considering of gains/losses upto FY 2013-14 and considering of Revenue deficit for the Retail Supply business for FY 14-15.</p> <p>Increase in the power purchase cost and corresponding cost of service lead to a revenue gap of Rs.3512 Cr for the FY 2015-16. To reduce this revenue gap, the licensees are undertaking several energy conservation and loss reduction activities. But, without realistic revision in tariffs, these steps would fall short in bridging the revenue gap. Hence the licensees propose the tariff revisions</p>
2.	<p>The Cross subsidy surcharge on OA consumers should not be imposed for 2014-15 and 2015-16 as there has been power cut for industries till Nov-2014. Last power cut was on 20th of Nov-2014.</p>	<p>Provision 1 of the Section 42(2) of the Act-2003 reads as <i>Provided that such open access may be allowed before the cross subsidies are eliminated on payment of a surcharge in addition to the charges for wheeling as may be determined by the State Commission.</i></p> <p>Hence Cross Subsidy surcharge is provided to meet the levels of cross subsidies determined in respective tariff order in the event that cross subsidizing consumer opts for open access.</p>

<p>3.</p>	<p>We have installed and commissioned Captive Power Plant of 50.40 MW in Vishnupuram falling under Nalgonda Circle to cater our power requirement of units located in Malkapur (RR Dist), Chilamkur and Yerraguntla (Cuddapah Dist). We are exporting power to our units every month. But to comply the Tariff conditions existing as of now, we have been forced to stop export to other units while consuming power from Discom at Vishnupuram for a period of 3 to 4 days in a month to consumer minimum units based on billing demand recorded.</p> <p>In this regard we request to consider Waival of minimum units consumption on billing demand recorded in that month since there has been power shortage in Telangana State and also these unit can be utilized by some other customers across the line.</p> <p>(OR)</p> <p>Alternatively we may be allowed to consume the minimum units to be consumed in Vishnupuram at other unit in Malkapur (RR-708) falling under same Discom TSSPDCL along with minimum units of that Unit also.</p>	<p>As per the clause 2.2.38 of GTCS</p> <p>““minimum charges” means the charges payable by the consumer even if no electricity is actually consumed for any reason whatsoever and also when the charges for the quantum of electricity consumed are less than the minimum charges specified by the Commission.”</p> <p>As per the HT Supply Specific conditions, 7 (1) i and ii, all the HT Cat I consumers has to utilize their energy above the stipulated limit of minimum charges i.e. 80% of CMD and energy on 50 units per KVA on 80% of CMD.</p> <p>Further as per your alternate request, there is no provision in the GTCS.</p> <p>Hence your request cannot be considered.</p>
<p>4.</p>	<p>Open access units drawn by other unit located in Malkapur from the captive power plant located in Vishnupuram should get adjusted in CC Bill of that month of Malkapur itself so that Malkapur unit need not pay electricity charges for the units imported from the Vishnupuram plant.</p>	

5a)	Though it may not be directly related to the Tariff related issue we would like to bring to your kind notice with a hope you may consider appropriately that the inadvertent unit arise at the consumer end should also be reduced from CC bill at least for power drawn from captive power plants.	Will be examined as per the relevant regulations.
-----	---	---

S.No	Summary of Objections / Suggestions	Response of the Licensee
	131. Munnuru Jayapal Reddy, President Palmoor R.O. Water Plants Association, H.No.8-3-18/A, Mettu Gadda, Mahabub Nagar	
1	<p>It is submitted that the petitioner is the palamoor R.O. water plants association regd.No. 354/2012 service connection of the water plants were under category III and the bills were charging under category III. ADE/Op/Mahaboob Nagar Town issued Assessment of back billing on service connections water plants at Mahabub Nagar since from the Aug'12.</p> <p>The member of the petitioner association approached the divisional engineer and made representation stating that the petitioner water purifying plants process the water to filter for the purpose of consumption of water and the same comes under industries.</p> <p>The Superintending engineer perused the representation of the petitioner and endorsed that the petitioner approach the TSERC for verification of the back bill and further endorsed that the connection need not be disconnected till getting instructions from TSERC. Hence prayed for directing the ADE/Opeartaion Mahabub Nagar Town not to disconnect the services on the ground of non payment of back billing assessment.</p> <p>Hence the petitioner humbly submits that the water purifying plant is a industry of processing the water and the same shall not come under the commercial activity. Hence the back billing estimated against the water plant service connections is not proper hence the water plant purifying plants proprietors who are member of the water plant association are not liable to pay the same hence the back billing assessment. Hence the same may be declared illegal and changing the category III connection of the water purifying plants into category II is also improper, hence to direct the ADE/Op/Mahaboob Nagar Town TSSPDCL not to change the service connections water purifying plants from Category III to category II.</p>	<p>As per the Tariff Order , Industrial purpose shall mean, supply for purpose of manufacturing, processing and/or preserving goods for sale, but shall not include shops, business houses, offices, public buildings, hospitals, hotels, hostels, choultries, restaurants, clubs, theaters, cinemas, bus stations, railway stations and other similar premises, notwithstanding any manufacturing, processing or preserving goods for sale.</p> <p>As per this definition R.O. plants does not come under Industry as there is no manufacturing activity and the water is being sold at higher prices and thus they are being categorized under Non-Domestic category.</p> <p>However the categorization of any activity is under the Purview of the Hon Commission.</p>

S.No	Summary of Objections / Suggestions	Response of the Licensee
	132. Indian Nurserymen Association, No.6-3-1104, Somajiguda, Raj Bhawan Road, Hyderabad – 500 082	
1.	<p>On behalf of the Indian Nurseymen Association, Telangana State Chapter I am pleased to inform that the Transco and Discoms are unnecessarily creating confusion by misinterpreting the Nursery activity as either Industrial or Commercial, which is leading to harassment of Nurserymen statewide. I hereby clarify that Nursery activity is Agriculture and doesn't come under commercial category as falsely misinterpreted and claimed by the Energy Department, which ultimately declared that Nursery activity is commercial activity. Subsequently misleading the Govt. through this false claim, based on which the Govt. thought that Nurseries come under Commercial category. We have written number of letters to the Electricity Authorities at various levels and also represented to the Hon'ble Chief Minister's of erstwhile united Andhra Pradesh with all possible proof and documents. We have been requesting to retain the Electricity charges under Agriculture Tariff. But it was not so, as all our letters addressed to various officials in the Electricity Department including the Hon'ble Minister's at different times has gone unanswered. Hence, we approach you based on the following documents in annexure-I.</p>	<p>It is to inform that as per the Tariff Order the rural horticulture nurseries with connected Load upto 15 HP are categorized under LT-V(C)-Others category and if the connected load is more than 15 HP they shall be billed under LT-III – Industrial General category tariff.</p>
2.	<p>It is to inform you that the nurseries presently have been classified as Rural and Urban with different tariff rates. This amounts to discrimination and may not stand good in the Court of Law. Apart from this the Present Govt. has already declared Poultry farming as part of farming sector, and also the Hon'ble Chief Minister has declared Free Power to Green Houses. Hence, it is our request that Nursery activity has to be considered as agriculture activity, as the law of the land cannot differ in different parts of the country and it should not be interpreted differently to the convenience of the demanding authorities.</p>	
3.	<p>Even the A.P. High Court order dated 01.10.2002 says that Nursery is Agriculture activity and hence should be charged under Agriculture has no bearing over any officials. We have gone to the extent of explaining that this would amount to contempt of court to almost all the officials at various levels, but the same is not</p>	

	<p>being taken care. For your information the Nursery activity was in agriculture tariff for all these years, only in the last few years due to subsidy announced and which was not being paid in time by subsequent Govt's, that the tariff of nurseries was claimed by the DISCOMs as commercial. There is ample proof of DISCOMs themselves declaring that Horticulture is Agriculture.</p>	
--	--	--

S.No	Summary of Objections / Suggestions	Response of the Licensee															
	<p>133. Hyderabad Small Scale Granite Industries Association, 8-3-167/D/72/2, Warlu Mansion, Kalyan Nagar, Hyderabad – 500 038</p> <p>134. Gayathri Granite, 2-158/11, Suraram, Hyderabad – 500 055</p> <p>135. Vinnakota Enterprises, 2-158/8, Suraram, Hyderabad – 500 055</p> <p>136. Vikrant Garg, Director, Maruti Cottex Ltd.</p> <p>137. Dhulipalla V.A.S.Ravi Prasad, Advocate, B2-106, Sy No.117 Part, Tatti annaram, GSI(SR)Post, Hyderabad – 500 068</p> <p>138. N.S.Naidu, Vasant Chemicals Pvt Limited, 1-11-251/1B,4th Floor, Vasant Towers, Behind Shoppers Stop, Begumpet, Hyderabad</p> <p>139. IKP Knowledge Park, genome valley, Turkappally, Shameerpet, RR Dist</p> <p>140. Keerthi Industries Limited, Plot No.40,IDA,Balanagar, Hyderabad</p> <p>141. Pramukh Packaging Pvt Limited, B-3, IDA, Uppal, Hyderabad</p> <p>142. Swastika weld mesh industries, P/6/A, IDA, Nacharam, Hyderabad</p> <p>143. Surana Wires Pvt Limited, P/6, IDA, N Acharam, Hyderabad</p> <p>144. SPM Wires & Cables Limited, Plot No. A-28/1/12, Road No.15, IDA, N Acharam, Hyderabad</p> <p>145. SPM Power & Telecom Pvt Limited, Plot No.A-28/1/12, Road No. 15, I.D.A. Nacharam, Hyderabad</p>																
5.	<p>It is respectfully submitted that the Learned Commission may kindly note the following views and suggestions while determining the ARR Proposal and also Tariff Proposals:</p> <p>(A) There is no clarity how the categorization of consumers on the basis of consumption was taken and same is the case with the mode for arriving at the categorization. The proposed increase of tariff for the consumers who consume above 200 units is not proportionate and reasonable. The mid-segment will be hit hard and if at all, the categorization has to be done, there should be more categories and all the consumers above 200 units cannot be clubbed. The Proposed increase for the consumers consuming beyond 200 and up to 400 units should be fixed proportionately on the lines of increase proposed in the previous category and the Learned Commission may be kind enough to consider the above submission and issue appropriate directions. It is further submitted that</p>	<p>The Discom has proposed to continue the existing slabs to extend the benefit to the poor & low consumption consumers. TSSPDCL is making vigorous inspections and registered pilferage cases in its area. The cases booked and amount booked during First half of FY2014-15 is tabulated below.</p> <table border="1" data-bbox="1516 1127 2421 1424"> <thead> <tr> <th></th> <th>Apr-14 to June-14</th> <th>July-14 to Sep-14</th> </tr> </thead> <tbody> <tr> <td>No of services inspected</td> <td>189519</td> <td>140824</td> </tr> <tr> <td>No of cases booked</td> <td>29990</td> <td>29046</td> </tr> <tr> <td>Multiple connections</td> <td>138 clubbed into 52</td> <td>148 clubbed into 46</td> </tr> <tr> <td>Direct Tapping</td> <td>6343</td> <td>5719</td> </tr> </tbody> </table>		Apr-14 to June-14	July-14 to Sep-14	No of services inspected	189519	140824	No of cases booked	29990	29046	Multiple connections	138 clubbed into 52	148 clubbed into 46	Direct Tapping	6343	5719
	Apr-14 to June-14	July-14 to Sep-14															
No of services inspected	189519	140824															
No of cases booked	29990	29046															
Multiple connections	138 clubbed into 52	148 clubbed into 46															
Direct Tapping	6343	5719															

<p>there are unorganized housing sector by various class of people, daily labourer, workers and other consumers whose consumption was never accounted for as this unorganized housing sector was never metered nor any steps were taken to regularly monitor the illegal connections like connecting during the night and disconnecting in the day time which is rampant in urban areas and this burden and cost of consumption is passed on to the other consumers and the individual consumers are worst hit by the above count. It is right time that the learned commission should consider appointing monitoring committees in various places to check fly by night connections so that there will be saving in the power consumption and cost of the actual power consumed is remitted to the DISCOMs. It is also further submitted that there has been lot of pilferage of power and so far DISCOMS have not bothered to conduct any study and correct statistics and take steps to prevent pilferage and unfortunately the cost of the Pilferage because of the negligence of the Discoms is passed on to the genuine consumers and thus, the honest consumers are taxed for their honesty.</p>	Amount assessed & realised (in Lakhs)	107.92/34.61	133.34/30.32
	Meter bypassing	1509	1093
	Amount assessed & realised	552.39/173.54	249.46/98.94
	Supply utilised for UDC	1902	2278
	Amount assessed & realised	7.82/3.77	9.68/3.42
	Supply extended to other tariff Category	4858	4999
	Amount assessed & realised	184.44/114.88	299.68/120.17
		<p>The Licensee is working on actively cutting down losses. The Vigilance (DPE) wings are available in the DISCOMs who are exclusively conducting inspections to detect theft and any other unauthorized usage of supply by the consumers The DPE wing is conducting the intensive inspections on high loss DTR areas along with Operation Engineers for verifications of bill stopped, UDC, Nil Consumption, not in use services and meter tamper services. And conducting of special raids in rampet theft areas to book theft cases. Apart from the DPE wing, the operation staff are also booking cases where ever theft is noticed. In view of the above, all the necessary steps are being taken to curb the theft of energy in TSSPDCL.</p>	
6.	(B) Discom has not followed a scientific approach to determine the revenue requirement, revenue and energy deficit and the figures on the above count are imaginary and intended to suite the requirements of the DISCOM.	<p>The revenue requirement of the discoms has been computed to cover the following key components of costs- 1.Power purchase costs</p>	

		<p>2. Distribution costs</p> <p>3. State Transmission costs</p> <p>4. PGCIL, ULDC and SLDC charges.</p> <p>5. Consumer security deposits.</p> <p>6. True-up/true-down of previous years</p> <p>Revenue has been computed based on the category-wise sales forecast and the proposed tariff for each consumer category.</p> <p>Availability of power has been computed based on the availability furnished by the generators and market purchases. Energy deficit has been arrived based on the projected availability of power and demand from consumers.</p> <p>Hence the discoms have followed a methodical approach based on sound scientific principles in accordance with the 'Regulation No.4 of 2005 (Terms and Conditions for Determination of Wheeling and Retail Sale 'of Electricity) issued by the Hon'ble Commission.</p>
7.	(C) Compared to the previous years, the growth rate on actual ground has come down which is as per the statistics in the public domain. These facts have not been considered by the DISCOM for the energy deficit and power purchase.	Sales projections are made as per the historical sales data, upcoming loads which will have large impact in the sales, anticipated economic & climatic conditions, Govt. policies on industry, etc. The licensee is projecting sales with the acceptable scientific methods. The DISCOMS have projected the sales keeping in view of the economic condition of the districts after the bifurcation, increasing industrial activity, focus of new government on industries and commercial activities.
8.	(D) The increased tariff by DISCOMS is artificial. In this connection it is essential to note that the Government in the State of Delhi and which	In the Tariff Order for FY2013-14, the average Cost to Serve (CoS) as approved by the Hon'ble Commission for

	<p>came into power again has reduced the tariff by 50% and ordered audit of the DISCOMS to find out the correctness or otherwise of revenue and expenditure of the DISCOM. It is therefore necessary that the learned commission should contemplate issuing orders for audit of the DISCOMS by the C&AG as is being done in state of DELHI and until such time, be pleased to direct that the present proposal to increase the rate to be held in abeyance.</p>	<p>the Telangana was Rs.5.46/Unit. Since then, there has been a significant increase in the average CoS during the year and the licensee expects the trend to continue for the ensuing year.</p> <p>The Licensee estimates the state level CoS for the year FY2015-16 to be at Rs.5.98/Unit. This implies that an increase of Rs.0.52/Unit (10 % increase)</p> <p>The increase in the CoS is due to the following reasons</p> <ol style="list-style-type: none"> 1. The Network cost approved in FY2013-14 was Rs.0.83/Unit and this has increased to Rs.1.00/Unit primarily due to increase in wages of employees, increased Capital Investment of the licensee. 2. The interest costs on the short term loans converted to Long term loan under Financial Restructure plan amounts to Rs.141 crore has also increased the ARR in FY2015-16. 3. The Licensees has projected a consolidated revenue deficit for FY2013-14 and FY2014-15 to the tune of Rs.1463 crore. The high revenue deficit for the period is primarily due to increase in Power Purchase cost, Network cost and other cost in FY2014-15 as there is no tariff revision in FY2014-15. <p>The Distribution licensee feels that the increased CoS should reflect appropriately in the tariff structure. Hence, the licensee proposed nominal tariff hike for various categories.</p>
9.	<p>(E) Private power producing companies are inflating the cost of coal and fuel etc., and thereby inflating the selling price of the power under power purchase agreements. This is going unchecked and DISCOMS are buying the power from these private companies without appreciating the artificial</p>	<p>Determination of cost of coal and gas is not in the purview of Discoms. However the Discoms are procuring power through Short term and medium term sources duly followinh the rules and competitive bidding</p>

	hiking of the Purchase price by these companies.	guidelines in vogue.																																	
10.	(F) The very fact that there is no uniformity in the purchase price of power per unit from various companies reveal that the DISCOMS are not trying to scrutinize the reasonableness of the price being quoted by the power producers. It is therefore suggested to have a mechanization to ascertain that the Power producing companies do not make unreasonable gains at the cost of the energy consumers. The learned commission may also contemplate appointing scrutinizers, persons from consumer's side and independent technical consultants to audit the power producing companies to ensure that these companies do not inflate the cost and expenses and thereby make unreasonable gains.	The purchase price of power per unit of various sources can not be uniform as it depends on various factors such as nature of Fuel, the location at which the station located, the technology used, etc.																																	
11.	(G) The DISCOMS have not made any exercise in ascertaining and arresting energy pilferage with the result, the cost of the pilferage is passed on to the consumers and the DISCOMS are being let off and allowed to pass on the additional cost arising on account of their negligence on to the consumers.	<p>TSSPDCL is making vigorous inspections and registered pilferage cases in its area. The cases booked and amount booked during First half of FY2014-15 is tabulated below.</p> <table border="1"> <thead> <tr> <th></th> <th>Apr-14 to June-14</th> <th>July-14 to Sep-14</th> </tr> </thead> <tbody> <tr> <td>No of services inspected</td> <td>189519</td> <td>140824</td> </tr> <tr> <td>No of cases booked</td> <td>29990</td> <td>29046</td> </tr> <tr> <td>Multiple connections</td> <td>138 clubbed into 52</td> <td>148 clubbed into 46</td> </tr> <tr> <td>Direct Tapping</td> <td>6343</td> <td>5719</td> </tr> <tr> <td>Amount assessed & realised (in Lakhs)</td> <td>107.92/34.61</td> <td>133.34/30.32</td> </tr> <tr> <td>Meter bypassing</td> <td>1509</td> <td>1093</td> </tr> <tr> <td>Amount assessed & realised</td> <td>552.39/173.54</td> <td>249.46/98.94</td> </tr> <tr> <td>Supply utilised for UDC</td> <td>1902</td> <td>2278</td> </tr> <tr> <td>Amount assessed & realised</td> <td>7.82/3.77</td> <td>9.68/3.42</td> </tr> <tr> <td>Supply extended to</td> <td>4858</td> <td>4999</td> </tr> </tbody> </table>		Apr-14 to June-14	July-14 to Sep-14	No of services inspected	189519	140824	No of cases booked	29990	29046	Multiple connections	138 clubbed into 52	148 clubbed into 46	Direct Tapping	6343	5719	Amount assessed & realised (in Lakhs)	107.92/34.61	133.34/30.32	Meter bypassing	1509	1093	Amount assessed & realised	552.39/173.54	249.46/98.94	Supply utilised for UDC	1902	2278	Amount assessed & realised	7.82/3.77	9.68/3.42	Supply extended to	4858	4999
	Apr-14 to June-14	July-14 to Sep-14																																	
No of services inspected	189519	140824																																	
No of cases booked	29990	29046																																	
Multiple connections	138 clubbed into 52	148 clubbed into 46																																	
Direct Tapping	6343	5719																																	
Amount assessed & realised (in Lakhs)	107.92/34.61	133.34/30.32																																	
Meter bypassing	1509	1093																																	
Amount assessed & realised	552.39/173.54	249.46/98.94																																	
Supply utilised for UDC	1902	2278																																	
Amount assessed & realised	7.82/3.77	9.68/3.42																																	
Supply extended to	4858	4999																																	

		<table border="1"> <tr> <td>other tariff Category</td> <td></td> <td></td> </tr> <tr> <td>Amount assessed & realised</td> <td>184.44/114.88</td> <td>299.68/120.17</td> </tr> </table>	other tariff Category			Amount assessed & realised	184.44/114.88	299.68/120.17
other tariff Category								
Amount assessed & realised	184.44/114.88	299.68/120.17						
		<p>The Licensee is working on actively cutting down losses. The Vigilance (DPE) wings are available in the DISCOMs who are exclusively conducting inspections to detect theft and any other unauthorized usage of supply by the consumers. The DPE wing is conducting the intensive inspections on high loss DTR areas along with Operation Engineers for verifications of bill stopped, UDC, Nil Consumption, not in use services and meter tamper services and conducting of special raids in rampant theft areas to register theft cases. Apart from the DPE wing, the operation staff are also registering cases wherever theft is noticed. In view of the above, all the necessary steps are being taken to curb the theft of energy in TSSPDCL</p>						
12.	(H) DISCOMS are also silent on Metering of agricultural consumers and consequential impact of the same on other consumers.	TSSPDCL is adopting the ISI suggested methodology for estimating the Agriculture consumption in which the sample agriculture DTRs are metered and the sample will vary for every six months so that, all the agriculture DTRs will be metered within a certain period.						
13.	(I) The learned commission's directives contained in tariff order for the year 2013 and 14 have not been complied with substantially by the DISCOM and its replies to the compliance of the above directive are evasive in most of the cases and on this count alone, the present ARR and Tariff proposal for to2015-16 could be held in abeyance till the Directives issued by the learned commission have been substantially complied with by the DISCOM. In this regard it is suggested that the learned commission may kindly appoint a committee with the representatives of each category of Consumers apart from the other members of repute and calibre to study and give a report on the compliance of the Directives of this learned	It is to inform that the directives issued by the Hon'ble Commission are complied and TSSPDCL is submitting the compliance report to the Hon Commission.						

	commission by the DISCOM. For instance some directives of the learned commission reproduced by the TSSPDCL in its ARR & Tariff proposal for the FY2015-16 under FRESH DIRECTIVES at page no.88 TO 97 however, they have not been complied with by the Discom. It is also submitted that some of the directives issued by the Learned Commission in its order for the financial year 2012 – 2013 have also not been complied with by the Discom till date and it is evidenced by the statements of the Discom in it proposal for the financial year 2015 – 2016.																								
14.	(J) There are differences in the revenue loss shown to have occurred for 2013 – 2014 but the figures do not match as shown in the petition more particularly with reference to Rs.2135 cores in case of TSSPDCL and this needs to be explained by the DISCOMs.	<p>The revenue loss of Rs.2135 crores for FY2013-14 is arrived in the following manner</p> <p style="text-align: right;">(in Rs. Crores)</p> <table border="1"> <thead> <tr> <th colspan="2">Tariff order</th> <th colspan="2">Actual</th> <th colspan="3">Variance</th> </tr> <tr> <th>Tariff Revenue</th> <th>Non-Tariff Income</th> <th>Tariff Revenue</th> <th>Non-Tariff Income</th> <th>Tariff Revenue</th> <th>Non-Tariff Income</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>16172.86</td> <td>98</td> <td>14120</td> <td>15.66</td> <td>2052.86</td> <td>82.34</td> <td>2135.2</td> </tr> </tbody> </table>	Tariff order		Actual		Variance			Tariff Revenue	Non-Tariff Income	Tariff Revenue	Non-Tariff Income	Tariff Revenue	Non-Tariff Income	Total	16172.86	98	14120	15.66	2052.86	82.34	2135.2		
Tariff order		Actual		Variance																					
Tariff Revenue	Non-Tariff Income	Tariff Revenue	Non-Tariff Income	Tariff Revenue	Non-Tariff Income	Total																			
16172.86	98	14120	15.66	2052.86	82.34	2135.2																			
15.	(K) The sales reduction is shown as 12.97% in the petition but the same does not tally with the figures shown in tables and other places.	<p>The sales reduction shown as 12.97% pertains to reduction in metered sales in FY2013-14 against the Tariff order approved sales. The same table shown in the filings with variance column addition is shown below</p> <table border="1"> <thead> <tr> <th rowspan="3">Particulars</th> <th colspan="4">2013-14 (APCPDCL)</th> </tr> <tr> <th>APERC Order</th> <th>Actuals</th> <th colspan="2">Variance</th> </tr> <tr> <th>MU</th> <th>MU</th> <th>MU</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Metered Sales</td> <td>26061.59</td> <td>22679.24</td> <td>(3382.35)</td> <td>(12.97)</td> </tr> <tr> <td>LT Agricultural Sales</td> <td>8073.9</td> <td>9190.49</td> <td>1116.59</td> <td>13.82</td> </tr> </tbody> </table>	Particulars	2013-14 (APCPDCL)				APERC Order	Actuals	Variance		MU	MU	MU	%	Metered Sales	26061.59	22679.24	(3382.35)	(12.97)	LT Agricultural Sales	8073.9	9190.49	1116.59	13.82
Particulars	2013-14 (APCPDCL)																								
	APERC Order	Actuals		Variance																					
	MU	MU	MU	%																					
Metered Sales	26061.59	22679.24	(3382.35)	(12.97)																					
LT Agricultural Sales	8073.9	9190.49	1116.59	13.82																					
16.	(L) The estimated gap in the prayer is 1293.56 crores for the year under	The estimated gap in the Prayer of Rs. 1283.56 crores for																							

	<p>review and the same does not match with the figures provided in the table in the petition. No rational was given for posing a tariff to consumers who consume less than 200 units and who consume more than 200 units.</p>	<p>the year FY2014-15 pertains to TSSPDCL excluding Anantapur & Kurnool gap which is shown in the following table</p> <table border="1" data-bbox="1513 305 2421 1182"> <thead> <tr> <th data-bbox="1513 305 1876 418" rowspan="2">Revenue Deficit / Surplus (Rs. Crs.)</th> <th colspan="3" data-bbox="1876 305 2421 342">2014-15</th> </tr> <tr> <th data-bbox="1876 342 2037 418">TSSPDCL</th> <th data-bbox="2037 342 2179 418">ATP & KNL</th> <th data-bbox="2179 342 2421 418">Total</th> </tr> </thead> <tbody> <tr> <td data-bbox="1513 418 1876 532">Aggregate Revenue Requirement (Rs. Crs.)</td> <td data-bbox="1876 418 2037 532">16086</td> <td data-bbox="2037 418 2179 532">590</td> <td data-bbox="2179 418 2421 532">16676</td> </tr> <tr> <td data-bbox="1513 532 1876 646">Revenue from Current Tariffs (Rs. Crs.)</td> <td data-bbox="1876 532 2037 646">13339</td> <td data-bbox="2037 532 2179 646">429</td> <td data-bbox="2179 532 2421 646">13767</td> </tr> <tr> <td data-bbox="1513 646 1876 727">Non - Tariff Income (Rs. Crs.)</td> <td data-bbox="1876 646 2037 727">12</td> <td data-bbox="2037 646 2179 727">1</td> <td data-bbox="2179 646 2421 727">13</td> </tr> <tr> <td data-bbox="1513 727 1876 808">Revenue from Wheeling (Rs. Crs.)</td> <td data-bbox="1876 727 2037 808">-</td> <td data-bbox="2037 727 2179 808">-</td> <td data-bbox="2179 727 2421 808">-</td> </tr> <tr> <td data-bbox="1513 808 1876 922">Revenue Deficit(-) / Surplus(+) at Current Tariffs (Rs. Crs.)</td> <td data-bbox="1876 808 2037 922">(2735)</td> <td data-bbox="2037 808 2179 922">(161)</td> <td data-bbox="2179 808 2421 922">(2896)</td> </tr> <tr> <td data-bbox="1513 922 1876 971">Subsidy</td> <td data-bbox="1876 922 2037 971">1585</td> <td data-bbox="2037 922 2179 971">62</td> <td data-bbox="2179 922 2421 971">1647</td> </tr> <tr> <td data-bbox="1513 971 1876 1036">Net gap- Deficit(-) / Surplus</td> <td data-bbox="1876 971 2037 1036">(1151)</td> <td data-bbox="2037 971 2179 1036">(99)</td> <td data-bbox="2179 971 2421 1036">(1250)</td> </tr> <tr> <td data-bbox="1513 1036 1876 1117">Carrying Cost @ 11.5% p.a.</td> <td data-bbox="1876 1036 2037 1117">132</td> <td data-bbox="2037 1036 2179 1117"></td> <td data-bbox="2179 1036 2421 1117"></td> </tr> <tr> <td data-bbox="1513 1117 1876 1182">Total Gap including Carrying Cost</td> <td data-bbox="1876 1117 2037 1182">1283</td> <td data-bbox="2037 1117 2179 1182"></td> <td data-bbox="2179 1117 2421 1182"></td> </tr> </tbody> </table>	Revenue Deficit / Surplus (Rs. Crs.)	2014-15			TSSPDCL	ATP & KNL	Total	Aggregate Revenue Requirement (Rs. Crs.)	16086	590	16676	Revenue from Current Tariffs (Rs. Crs.)	13339	429	13767	Non - Tariff Income (Rs. Crs.)	12	1	13	Revenue from Wheeling (Rs. Crs.)	-	-	-	Revenue Deficit(-) / Surplus(+) at Current Tariffs (Rs. Crs.)	(2735)	(161)	(2896)	Subsidy	1585	62	1647	Net gap- Deficit(-) / Surplus	(1151)	(99)	(1250)	Carrying Cost @ 11.5% p.a.	132			Total Gap including Carrying Cost	1283		
Revenue Deficit / Surplus (Rs. Crs.)	2014-15																																												
	TSSPDCL	ATP & KNL	Total																																										
Aggregate Revenue Requirement (Rs. Crs.)	16086	590	16676																																										
Revenue from Current Tariffs (Rs. Crs.)	13339	429	13767																																										
Non - Tariff Income (Rs. Crs.)	12	1	13																																										
Revenue from Wheeling (Rs. Crs.)	-	-	-																																										
Revenue Deficit(-) / Surplus(+) at Current Tariffs (Rs. Crs.)	(2735)	(161)	(2896)																																										
Subsidy	1585	62	1647																																										
Net gap- Deficit(-) / Surplus	(1151)	(99)	(1250)																																										
Carrying Cost @ 11.5% p.a.	132																																												
Total Gap including Carrying Cost	1283																																												
17.	(M) The cost of service is not reflected in the tariff proposed for both the domestic and industrial.	<p>With regard to the reflection of CoS in the Tariff it is to inform that the the tariff need not be the mirror image of actual cost of supply or voltage-wise cost of supply.</p> <p>The Hon Tribunal in various appeals held as under “ However, we are not suggesting that the tariffs should have been fixed as mirror image of actual cost of supply</p>																																											

		<p>or voltage-wise cost of supply or that the cross subsidy with respect to voltage-wise cost of supply should have been within $\pm 20\%$ of the cost of supply at the respective voltage of supply.”</p> <p>The legislature by amending Section 61(g) of the Electricity Act by Act 26 of 2007 by deleting the word ‘eliminating cross subsidies’ has expressed its intent that cross subsidies may not be eliminated.</p>
18.	<p>(N) Resorting to short term purchase will burden the consumers of all categories. The Discoms by this time should have a long term plan but, every year, the Discoms resort to short term plans and burden the consumers and this is highly discriminating, irresponsible and without any concern for the suffering consumers. The Learned Commission may kindly take note of this concern and give appropriate directions to the Discoms for the long term plans and purchase of power at reasonable rates.</p>	<p>Based on the projected demand for the coming years, discoms are taking all measures for procurement of power under long term basis. Procuring 2000 MW of power on long term basis under competitive bidding is currently under progress.</p> <p>An MOU for procuring 1000 MW of power from Chattisgarh has already been signed.</p>
19.	<p>(O) The claims of the Discoms for recovery of the principal and interest thereon of the short-term loans during 2015-16 and/or thereafter from consumers through true-up or tariff as also FSA amounts from 2009-10 to 2011-12 are not permissible in the present application by the Discoms.</p>	<p>The accumulated losses as on 31st march 2013 has been considered under the FRP scheme which was designed by GOI. Discoms pray that the Honorable Commission permit this as these are the actual cost incurred by the discoms.</p>
20.	<p>(P) Though then erstwhile APERC directed the Discoms to resubmit their ARR and tariff proposals in view of bifurcation of the State with updated details, the Discoms did not do so as such, the Discoms by virtue of their default and omission should not be permitted to recover carrying cost of Rs.132 crore for the year 2014-15 from the consumers.</p>	<p>Due to bifurcation of the State, the Government of Telangana had issued orders for the constitution of Telangana State Electricity Regulatory Commission (TSERC) in Jul’14 and TSERC was constituted in Nov’14. Hence the discoms have submitted ARR and tariff proposals for FY2015 along with the projected revenue gap for FY2014-15.</p>
21.	<p>(Q) Discoms have shown agricultural consumption exceeding the levels permitted by the Commission by 406 MU for TSNPDCL and an increase for 2014-15 to 37.28% from 32.87% in 2013-14; and by 1116.57 MU for TSSPDCL for the year 2013-14 and an increase for 2014-15 to 22.98%</p>	<p>Estimation of agricultural sales is based on the ISI methodology outlined by the Hon’ble Commission.</p> <p>Licensees are obligated to provide supply to all categories of consumers, including subsidised consumers.</p>

	<p>from 20.95% in 2013-14. Since the Government is giving subsidy including cross subsidy, the Commission should not permit true-up of expenditure for revised excess consumption for agriculture and the same should be provided as additional subsidy by the Government. Since the Government has agreed to provide substantial subsidy for 2015-16, the Discoms should explain what the above said subsidy covers and in the absence of the same, it has to be presumed that the same covers expenditure for revised excess consumption for agriculture.</p>	<p>As per the National Tariff Policy, the tariffs to the consumers are to be fixed at +/- 20% of COS. Hence it is deemed that the consumers whose tariffs are fixed over and above COS will cross subsidise the consumers whose tariffs are below COS to ensure revenue neutrality</p> <p>Any other revenue deficit after adjusting cross subsidy will be met through Government Subsidy.</p> <p>The projected revenue gap of the discom has to be met through revenue from tariffs and government subsidy.</p>
--	---	---

S.No	Summary of Objections / Suggestions	Response of the Licensee
146.	Bontala Chandra Reddy, H.No. 1-1-9/10, RTC X Road, Jawahar Nagar, Hyderabad	
147.	Sarampalli Malla Reddy, H.No. 1-1-60/2, RTC X Road, Musheerabad, Hyderabad	
1	<p>విద్యుత్ సరఫరా నిర్ణీత సమయం ప్రకారం సరఫరా కాకపోవడం : రెగ్యులేటరీ కమీషన్ నిర్ణయించిన విధంగా పంపు సెట్లకు విద్యుత్ సరఫరా కావడం లేదు. అందువల్ల కరెంటు ఎప్పుడు వస్తుందో ఎప్పుడు పోతుందో తెలియదు. సబ్ స్టేషన్ల వారిగా కాల నిర్ణయపట్టిక లేదు. నిజామాబాద్, మెదక్, వరంగల్ జిల్లాలలో వేలాది ఎకరాల పంటలు పంపు సెట్ల కింద ఎండిపోయి రాతంగం రునగ్రస్తులయ్యారు. ఋణం పెరగతం వాళ్ళ వారే ఆత్మహత్యలకు పాల్పడుతున్నారు. ముందు విద్యుత్ సరఫరా కొరతను ప్రచారం చాయనందున రతులు పాత పద్ధతిలోనే పంటలు వేశారు.</p> <p>రాష్ట్రంలో 40 లక్షల ఎకరాలు పంపు సెట్ల కింద సాగుచేయాల్సి ఉండగా 7-8 లక్షల ఎకరాలు మాత్రమే సాగుయ్యింది. అది కూడా దిగుబడులు తగ్గాయి.</p>	<p>విద్యుత్ సరఫరా మరియు డిమాండ్ కు మధ్య వ్యత్యాసం దృష్టిలో ఉంచుకొని విద్యుత్ వ్యవస్థను (గ్రీడ్) సమర్థవంతంగా నిర్వహించుటకుగాను వ్యవసాయ విభాగానికి రోజుకు 6 నుండి 7 గంటల విద్యుత్ సరఫరాను రెండు పర్యాయాలుగా అందిస్తూ అందులో ఒక దఫా ఉదయం వేళలో అందించడం జరుగుతుంది.</p>
2	<p>డిస్కాంల నిర్లక్ష్యం వలన ట్రాన్స్ ఫార్మర్లు మరియు పంపు సెట్లు కాలిపోవడం : డిస్కాంలు ట్రాన్స్ ఫార్మర్ల నిర్వహణ నిర్లక్ష్యం చేస్తున్నాయి. AB స్విచ్లు ఉండవు. ట్రాన్స్ ఫార్మర్ చుట్టూ గడ్డి, గాదం పెరిగి ఉంటుంది. ఎర్టింగ్ ఉండదు. వీటి ఫలితంగా ట్రాన్స్ ఫార్మర్లు కాలిపోవడం వాటి ఫలితంగా పంపు సెట్లు కాలిపోతున్నాయి. వేల రూపాయలు వ్యయం చేసి తిరిగి పంపు సెట్లు బాగు చేయించుకోవడం చేతకాక వదిలి వేస్తున్నారు.</p>	<p>డిస్కాంల బ్యూజిస్ ట్రాన్స్ ఫార్మర్లు వాటి మరమ్మతులను గుర్తించి సరి చేయుటకు తగు చర్యలు తీసుకోవడం జరుగుతుంది.</p>
3	<p>ట్రాన్స్ మిషన్ - కాలం గతించిన కండక్టర్ తో విద్యుత్ సరఫరా చేయడం వల్ల వస్తున్నా నష్టాలు : ట్రాన్స్ మిషన్ కండక్టర్ 30-35 సంవత్సరాల క్రితం వేసిన వాటితోనే విద్యుత్ సరఫరా చేస్తున్నారు. ఫలితంగా సరఫరా నష్టాలు ఎక్కువగా ఉంటున్నాయి. చాలా పంపు సెట్లకు 5-6 పోల్స్ దూరం సర్వీసు వీరు రైతులకు కనెక్షన్లు ఇచ్చారు. దీనివల్ల లో వోల్టేజి సమస్య వస్తున్నది. 20 సంవత్సరాలు కాలం</p>	<p>కాలం చెల్లిన విద్యుత్ కండక్టర్, పోల్లు, ట్రాన్స్ ఫార్మర్లు మొదలనవి గుర్తించి వారి స్థానంలో కొత్తవి ఏర్పాటు చేయుటకు ఎప్పటికప్పుడు తగు చర్యలు తీసుకోవడం జరుగుతుంది.</p>

S.No	Summary of Objections / Suggestions	Response of the Licensee
	గతించిన కండక్టర్ మార్చడానికి దెబ్బ తిన్న స్థంబాలను తిరిగి కొత్తవి వేయడానికి రెగ్యులేటరీ కమీషన్ ఆదేశాలు ఇవ్వాలి.	
4	డిస్కాం లో - ట్రాన్స్ కో లో ఖాళీలను భర్తీ చేయకపోవడం వల్ల సరఫరా నష్టాలు పెరగుట : డిస్కాంలలో ట్రాన్స్ కొలలో లైన్ మెస్ లతో పాటు ఇతర సిబ్బంది కాళీలు కొనసాగిస్తున్నారు. నిర్ణీత ఉద్యోగాలు భర్తీ చేస్తే తమకు ఆదాయం తగ్గుతుందన్న కారణంగా సంవత్సరాల తరబడి ఉద్యోగాలు భారీచేయకపోవడం ఫలితంగా వినియోగదారులకు సరఫరా లోపాలను సరిదిద్దడానికి సిబ్బంది సహాయంలేరు. అందువల్ల వారే స్వంత రిపేర్ చేసుకోవడం వల్ల విద్యుత్ షాక్ కు గురై మరణిస్తున్నారు. ఇలా మరణించిన వారి తప్పిగాన్ని వారి పైకే తోసి తప్పుకుంటున్నారు. సిబ్బంది నియామకానికి రెగ్యులేటరీ కమీషన్ డిస్కాం, ట్రాన్స్ కో సంస్థలను ఆదేశించాలి.	వివిధ కేసులు కోర్టుల్లో పెండింగ్ లో ఉన్నందున నియామకాలు ఆగినవి.
5	రాష్ట్ర విభజన ఒప్పందాల అమలు కాకపోవడం వలన విద్యుత్ కొరత గురించి : రాష్ట్ర విభజన చట్టం ప్రకారం రావాల్సిన విద్యుత్ సరఫరా కావడం లేదు. తెలంగాణ రాష్ట్రంలో విద్యుత్ ఉత్పత్తి కేంద్రాలు తగినన్ని లేవు. గతంలో వినియోగించుకున్న మాదిరిగా రానున్న సంవత్సరాలలో వినియోగించుకోవాలని చెప్పారు. షెడ్యూల్డ్ 12(సి) లో ఉదాహరించినవేవి అమలు జరగడం లేదు. సెక్షన్ 92 ప్రకారం ఇవ్వాలిని విద్యుత్ రావడం లేదు. రానున్న 3 సంవత్సరాల వరకు విద్యుత్ కొరత ప్రస్తుతం ఉన్నట్టే ఉంటుందని గౌరవ ముఖ్య మంత్రి గారు ప్రకటిస్తున్నారు. విభజన చట్టాన్ని అమలు చేయాల్సిందిగా రెండు రాష్ట్ర ప్రభుత్వాలను ఆదేశించాలని రెగ్యులేటరీ కమీషన్ ను కోరుతున్నాను. చట్టంలో ఉన్న ప్రకారం రాష్ట్రానికి కేంద్ర ప్రభుత్వం ఇస్తామన్న 4000 మెగా వాట్ల ప్రాజెక్టు చర్యలు చేపట్టాల్సిందిగా ప్రభుత్వాన్ని ఆదేశించాలి.	రాష్ట్ర పునర్ విభజన చట్టం 2014 ను అనుసరించి లైసెన్సీ రావలసిన విద్యుత్ పొందుటకు తగు చర్యలు తీసుకోవడం జరుగుతుంది.
6	పంపు సెట్ల కింద వేసిన పంటల నష్ట పరిహారం చెల్లించుట గురించి : విద్యుత్ సంస్థలు మరియు	వ్యవసాయ దారులకు నాణ్యమైన ఉచిత విద్యుత్ అందించుటకు తగు చర్యలు తీసుకోవడం

S.No	Summary of Objections / Suggestions	Response of the Licensee
	<p>ప్రభుత్వం ముందు సరఫరా పరిస్థితి ప్రకటించక పోవడంతో రైతులు పంటలు వేసి నష్టపోతున్నారు. పెట్టిన పెట్టుబడి కూడా పూర్తిగా నష్టాలతో కూరుకు పోతుంది. అందువలన పంటల నష్టాన్ని రెవిన్యూ అధికారులతో పంచనామా చేయించి ప్రభుత్వం కానీ, విద్యుత్ సంస్థ కానీ పరిహారం చెల్లించే విధంగా ఆదేశాలు ఇవ్వగలరు.</p>	<p>జరుగుతుంది. విద్యుత్ సరఫరా అందుబాటును గూర్చి ఎప్పటికప్పుడు సమాచారం అందించడం జరుగుతుంది.</p>
7	<p>పంపు సెట్లకు ట్రాన్స్ ఫార్మర్లకు కేపాసిటర్లు బిగించకపోవటం : గతంలో రెగ్యులేటరీ కమీషన్ ఆదేశించినప్పటికీ పెట్టలేదు. కొంతమంది రైతులు కొనుగోలు చేసి తమ ఇళ్లలోనే పెట్టుకున్నారు. డిస్కం లు కేపాసిటర్లు పెట్టినట్లు రెగ్యులేటరీ కమీషన్ కు తెలియపరుస్తున్నారు. వాస్తవాలను రేగ్యులేటరీ కమీషన్ ఒక విచారణాధికారిని నియమించి స్వయంగా తెలుసుకోవాలని కోరుతున్నాం. కేపాసిటర్లు పెట్టడం వల్ల కనీసం 10 శాతం విద్యుత్ ఆదా అవుతుంది.</p>	<p>విద్యుత్ వినియోగదారులకు విద్యుత్ పొదుపు మార్గాలను వివిధ ప్రసార సాధనాల ద్వారా ప్రచారం కల్పించడం జరుగుతుంది.</p>
8	<p>విద్యుత్ షాక్ వలన మరణించిన వారికి పరిహారం చెల్లించకపోవటం : విద్యుత్ షాక్ వల్ల మరణించిన వారిలో చాల మంది ఎక్స్ గ్రేషియా ఇవ్వలేదు. విచారణ పేరుతో సంవత్సరాల తరబడి కాలయాపన చేస్తున్నారు. చని పోయిన కొంత మందికి కేసుకుడా రిజిస్టర్ చేయలేదు. ఈ విషయాలు విచారణ సందర్భంగా మీ దృష్టికి తెస్తాను.</p>	<p>గౌరవ కమీషన్ వారి ఆదేశాల మేరకు సిబ్బందేతర విద్యుత్ ప్రమాదాలకు గురి అయి మరణించిన యెడల మనుష్యులకు రూ.2,00,000-00 మరియు పశువులకు రూ.20,000-00 చొప్పున ఎక్స్ గ్రేషియా శాఖ పరమైన విచారణ అనంతరం మరణించిన వారి కుటుంబ సభ్యులకు అందించడం జరుగుతుంది.</p>
9	<p>విద్యుత్ సంస్థల నిర్వహణ సమీక్షకు కనీసం మండల సతి కమిటీని వేయాలి. రాష్ట్ర స్థాయిలో అఖిల పక్ష కమిటీ వేయాలి. ఇందుకు ప్రభుత్వాన్ని ఆదేశించాలని కోరుతున్నాం.</p>	<p>లైసెన్సీ పరిధిలో లేని అంశము.</p>
10	<p>పై అంశాలతో పాటు మరి కొన్ని అంశాలను మీ ముందు ప్రత్యక్షంగా చెప్పదలచుకున్నాను కావున అవకాశం ఇవ్వగలరని కోరుచున్నాను.</p>	<p>లైసెన్సీ పరిధిలో లేని అంశము.</p>

S.No	Summary of Objections / Suggestions	Response of the Licensee
148. N.Venugopal Reddy, H.No. 23-6-202, Hanama Konda, Dwaraka Nagar, Warangal		
1	విద్యుత్ పొదుపు	TSSPDCL పరిధిలో ఎనర్జీ పొదుపు చర్యలో భాగంగా " బచత్ లాంప్ యోజన " అనేకార్యక్రమము, "బ్యూరో ఆఫ్ ఎనర్జీ ఎఫిషియన్సీ" వారి సహకారంతో చేపట్టబడినది. ఇందులో భాగంగా incandescent బల్బులను, CFLబల్బులతో మార్చే పనిని M/s. C-Quest Capital Green Ventures అనే సంస్థకు ఇవ్వబడినది. ఆరు ఆపరేషన్ డివిజన్లలోని దాదాపు 6.5 లక్షల CFL బల్బులను ఇళ్ళకు సరఫరా చేయడమైనది
2	విద్యుత్తు డిమాండ్ ని తగ్గించడం	పెరుగుతున్న విద్యుత్ అవసరాలకు అనుగుణంగా విద్యుత్ డిమాండ్ పెరుగుతుంది.
3	ప్రత్యేక ఫీడర్లు	గ్రామాలకు ప్రత్యేక వ్యవసాయ ఫీడర్లు ఏర్పాటు చేయడానికి చాలా ఖర్చు అవుతుంది. అయినప్పటికీని ప్రత్యేక లైన్ లు వేయడం ద్వారా వ్యవసాయ ఫీడర్ లను వేరు పరచడం గురించి లైసెన్సీ వారు పరిశీలన చేస్తున్నారు
4	క్షేత్ర స్థాయి నిర్వహణ సామర్థ్యం పెంచడం	తగు చర్య తీసుకుంటాం
5	అందరికీ మీటర్లు బిగించాలి	వారు ఇంటెన్సివ్ ఇన్స్పెక్షన్ నిర్వహించి అక్రమ కనెక్షన్లను క్రమబద్ధీకరిస్తున్నారు
6	ఉచిత కరెంట్ ఎత్తి వేయాలి	వర్నమెంట్ వారి పాలసీ ప్రకారం మరియు గౌరవ కమిషన్ వారి టారిఫ్ ఆర్డర్ ప్రకారం, వ్యవసాయ వినియోగ దారులకు ఉచిత విద్యుత్ ఇవ్వడం జరుగుతున్నది.
7	24 గంటలు నాణ్యమైన కరెంట్ ఇవ్వాలి	ప్రస్తుతము సరిపడా విద్యుత్ లభ్యత లేనందున 6 గంటలు నుండి 7 గంటల విద్యుత్ సరఫరా ఇవ్వడం జరుగుచున్నది. వచ్చే కొద్ది నెలలో KTRP నుండి 600 మెగావాట్ల, సింగరేణి నుండి 600 మెగావాట్ల మరియు సౌర విద్యుత్ 300 నుండి 400 మెగావాట్ల వరకు విద్యుత్ ఉత్పత్తి జరగనున్నది. ఆ విద్యుత్ ఉత్పత్తి అందుబాటులోకి వచ్చిన వెంటనే విధిగా 7 గంటల విద్యుత్ సరఫరా చేయ బడును.

S.No	Summary of Objections / Suggestions	Response of the Licensee																					
149. Addanki Dayakar, Q.No.B-78, Patigadda, Secunderabad. Mobile No.9391133779																							
1	Regarding surplus power	<p>TSDISCOMS have projected the energy availability from various energy sources as per the AP Reorganisation Act and as per best estimates of parameters like coal availability, maintenance schedules, PLF etc. from existing stations as well as upcoming stations of Andhra Pradesh like Krishnapatam, Hinduja etc.</p> <p>If these stations achieve CoD as per the projection of ARR and share power with Telangana as per AP Reorganisation Act, this would result in the Energy surplus scenario as projected in the ARR</p>																					
2	Vigilance on Electricity	<p>Intensive inspections are being conducted on high loss feeders continuously to curb the theft and to reduce the losses.</p> <p>TSSPDCL is making vigorous inspections and registered pilferage cases in its area. The cases booked and amount booked during First half of FY 2014-15 is tabulated below.</p> <table border="1"> <thead> <tr> <th></th> <th>Apr-14 to June-14</th> <th>July-14 to Sep-14</th> </tr> </thead> <tbody> <tr> <td>No of services inspected</td> <td>189519</td> <td>140824</td> </tr> <tr> <td>No of cases booked</td> <td>29990</td> <td>29046</td> </tr> <tr> <td>Multiple connections</td> <td>138 clubbed into 52</td> <td>148 clubbed into 46</td> </tr> <tr> <td>Direct Tapping</td> <td>6343</td> <td>5719</td> </tr> <tr> <td>Amount assessed &realised (in Lakhs)</td> <td>107.92/34.61</td> <td>133.34/30.32</td> </tr> <tr> <td>Meter bypassing</td> <td>1509</td> <td>1093</td> </tr> </tbody> </table>		Apr-14 to June-14	July-14 to Sep-14	No of services inspected	189519	140824	No of cases booked	29990	29046	Multiple connections	138 clubbed into 52	148 clubbed into 46	Direct Tapping	6343	5719	Amount assessed &realised (in Lakhs)	107.92/34.61	133.34/30.32	Meter bypassing	1509	1093
	Apr-14 to June-14	July-14 to Sep-14																					
No of services inspected	189519	140824																					
No of cases booked	29990	29046																					
Multiple connections	138 clubbed into 52	148 clubbed into 46																					
Direct Tapping	6343	5719																					
Amount assessed &realised (in Lakhs)	107.92/34.61	133.34/30.32																					
Meter bypassing	1509	1093																					

S.No	Summary of Objections / Suggestions	Response of the Licensee			
		Amount assessed &realised	552.39/173.54	249.46/98.94	
		Supply utilised for UDC	1902	2278	
		Amount assessed &realised	7.82/3.77	9.68/3.42	
		Supply extended to other tariff Category	4858	4999	
		Amount assessed &realised	184.44/114.88	299.68/120.17	
3	Electrical Shocks	<p>The Licensee is working on actively cutting down losses. The Vigilance (DPE) wings are available in the DISCOMs who are exclusively conducting inspections to detect theft and any other unauthorized usage of supply by the consumers The DPE wing is conducting the intensive inspections on high loss DTR areas along with Operation Engineers for verifications of bill stopped, UDC, Nil Consumption, not in use services and meter tamper services. And conducting of special raids in rampet theft areas to book theft cases. Apart from the DPE wing, the operation staff are also booking cases where ever theft is noticed. In view of the above, all the necessary steps are being taken to curb the theft of energy in TSSPDCL</p>			
4	Why Government increasing capital in Govt companies	Not in the purview of the discoms			

S.No	Summary of Objections / Suggestions	Response of the Licensee
150. Gundlapally Sreenu Mudiraj, H.No.6-1-177, C-94, Hill colony, Vanasthalipuram, Hyderabad-70 Ph.No.9676990777		
1	Please allow me to participate in person on behalf of mudiraj research center	In the purview of the Hon commission

S.No	Summary of Objections / Suggestions	Response of the Licensee
151. S.M.S.Rao, Co-head groups coordinator, Aam Aadmi party (Telangana state) , Opp:GHMC, Liberty 'X' road, Hyderabad-29. Mobile No.8106798499		
1.	Grant a permission to us to give our party opinion on power tariff for the year of 2015-16, in public hearing day (i.e.13 or 14 th of March 2015)	In the purview of the Hon commission

S.No	Summary of Objections / Suggestions	Response of the Licensee
152. D. Ramu, H.No. 2-1-175, Raj Priya Residency, Nalla Kunta , Hyerabad- Moblile No. 9441901736		
1.	టోల్ ప్రీ నంబర్ పని విధానం గురించి అనుమానాలు ఆమలుచేయడానికి ఏమి చేస్తారు	పరిశీలించి తగు చర్యలు తీసుకోవడాను
2	విద్యుత్ మరణాలు తగ్గించడం కొరకు మీరు ఏమి ప్రయత్నాలు చేసినారు	<p>లైసెన్సీవారు విద్యుత్ప్రమాదాలు జరుగకుండా అనేకవిధమైన చర్యలు తీసుకోవడం జరుగుతోంది. అందులో భాగంగా కండక్టర్లను మార్పడం, లైనులమధ్య స్తంభాలు ఏర్పర్పడం, ట్రాన్స్ఫార్మర్ల రియూ ఎల్.టీ .లైనులను నిర్వహించడం, ఎర్లింగ్ మకూర్పడం మొదలగు నిత్యకృత్యమైన నిర్వహణపనులు చేయుబడుచున్నవి.</p> <p>రైతులు ట్రాన్స్ఫార్మర్ల నిర్వహణలో జోక్యంచేసుకోకుండా వుండుటకై విస్తృతప్రచారం చేయడం జరుగుతుంది.</p>
3	డి టి ఆర్ కాలిఫోనియన్ పుడు రిపేరింగ్ సిబ్బంది వైపు నుండి జరగడం లేదు	<p>పాడైన ట్రాన్స్ ఫార్మర్ లను బాగు చేయటానికి TSSPDCL పరిధిలో సరిపడు ట్రాన్స్ ఫార్మర్ రేపైరింగ్ షెడ్ లు కలవు.</p> <p>TSSPDCL వారు ట్రాన్స్ ఫార్మర్లు మార్పడానికి మరియు ట్రాన్స్ పోర్ట్ కొరకు ప్రతి సబ్- డివిజన్ కు ఒక ట్రాన్స్ పోర్ట్ వాహనమును ఏర్పాటు చేస్తారు. డిపార్ట్ మెంట్ వారి చేతనే DTR లు ట్రాన్స్ పోర్ట్ మరియు మార్పబడుతున్నవి.</p> <p>ట్రాన్స్ ఫార్మర్ల ట్రాన్స్ పోర్ట్ మరియు ఎరక్షన్ అన్నది డిపార్ట్ మెంట్ చేస్తుంది.</p>
4	10 నిముషాలు మాట్లాడటానికి అనుమతి ఇవ్వగలరు	లైసెన్సీ పరిధిలో లేని అంశము.

S.No	Summary of Objections / Suggestions	Response of the Licensee
153. MD. Munawar Chand, H.No.1-4-298, Bhola Nagar, Musheera bad, Hyderabad Cell No.9701550229		
1.	<p>Unknown charges in the bill.</p> <p>More Interest</p> <p>Quality Power Supply</p>	<p>There are no unknown charges in the bill. The billing is made as per the terms and conditions of the tariff order.</p> <p>Delay Payment Surcharge is being levied as per the Tariff Order.</p> <p>During the financial year 2013-14 Rs. 35 crores expenditure incurred towards Renovation & Modernisation Works and Reliability Improvement and Contingency Works for network strengthening. Out of that expenditure in rural is Rs. 17.23 crores and urban Rs. 17.77 crores.</p> <p>Further old and deteriorated transformers are survey reported and replenished regularly.</p>

S.No	Summary of Objections / Suggestions	Response of the Licensee
154. KRC Reddy, 287, Singareni colony, P.O. Vaishali Nagar, Hyderabad. Mobile No. 8297704816		
1.	Whether capacitor banks are installed for agriculture load substations. Energy that can be saved district wise and financial impact.	836 Numbers of 2MVAR Capacitor Banks at 33/11Kv sub station are installed and inservice. Further 216 Nos Capacitor banks will be commissioned within a year.
2	Whether energy meters are installed for all the transformers providing for agriculture load in all districts. This is required to assess the actual energy consumption for agriculture in the state	<p>Indian Statistical Institute (ISI) presented a new methodology for assessing agricultural consumption. The methodology picked up (2245 Nos.) samples from the population of Agl. DTRs for TSSPDCL (for six circles i.e. Mahabubnagar, Nalgonda, Medak, RR East, RR North & RR South). The sample is dynamic. (i.e.) over a period of six months, locations for 10% of the sample DTRs in each circle are to be changed, for effective implementation. As directed by the Regulatory Commission, meters were installed for 10% of sample size (i.e. 225 Nos.) in addition, so as to increase the number of valid DTRs to be considered for assessment of consumption. Since the metering is done on the LV side of the agricultural DTRs, the assessed consumption as per the procedure includes the consumption of unauthorized agricultural services also. The assessment of agricultural consumption as per the ISI methodology is done every month and is filed with the Hon'ble TSERC.</p> <p>It is difficult to meter all the DTRs serving to agricultural connections. The agricultural DTR meters are exposed to atmosphere hence more chances to damage of meters. This results in is loss of revenue and not practical.</p> <p>However the methodology now being followed is scientific and approved by Hon'ble TSERC.</p>

3	What steps are taken to reduce the expenditure at the state level for purchasing power by the discoms which is about 70% of the energy cost	The Discoms are putting all efforts to buy cheaper power through the process of transparent bidding process.
4	What are the steps taken by the discoms on energy conservation front	<p>The Government has constituted a State Energy Conservation Mission for monitoring of energy conservation activities. The licensees are also undertaking several loss reduction measures like HVDS implementation, energy audit, replacement by high quality meters, laying of AB Cables, etc to reduce both the technical and commercial losses</p> <p>In TSSPDCL in order to comply one of the initiatives of energy conservation the replacement of the ICLs with CFLs has been taken up under Bachat Lamp Yojana in coordination with Bureau of Energy Efficiency (BEE). M/s CQuest Capital Green Ventures Private Limited have been entrusted the above job.</p>

S.No	Summary of Objections / Suggestions	Response of the Licensee
155. General Secretary, Confederation of Welfare Associations, Mehdipatnam, 12-2-823/A/1/2, Santosh Nagar, Opp. Chaitanya Techno School, Mehdipatnam, Hyderabad-500028		
1.	We the representatives of COWAM would like to participate in the Public Hearing scheduled on 13 th and 14 th of March 2015 and to make a representation requesting to change the present commercial tariff of colony parks to Agriculture tariff being levied.	As per the definition of Tariff Order, the nature of activity of watering the lawns and colony parks come under the Non-Domestic Category. Hence the applying of LT-II tariff is as per the terms and conditions of Tariff mentioned in the Tariff Order.

S.No	Summary of Objections / Suggestions	Response of the Licensee
156. Chairman, Confederation of Welfare Associations, Mehdipatnam, 12-2-823/A/1/2, Santosh Nagar, Opp. Chaitanya Techno School, Mehdipatnam, Hyderabad-500028		
1.	The TSSPDCL is applying commercial Tariff (Cat-II) for the power supply released to these Colony parks. The power supply in this colony park is utilized for running the pump for watering the plantation and lawns in the parks and lighting in the pump house room. There is absolutely.no commercial activity in the parks. The parks are synonymous to agriculture fields.	As per the definition of Tariff Order, the nature of activity of watering the lawns and colony parks come under the Non-Domestic Category. Hence the applying of LT-II tariff is as per the terms nad conditions of Tariff mentioned in the Tariff Order.

S.No	Summary of Objections / Suggestions	Response of the Licensee
157. Consumer Welfare Council, Patancheru, H.No.16-237, Allwyn Colony, GHMC, Patancheru		
1.	<p>వినియోగదారుల సంక్షేమం, రక్షణ దృష్ట్యా మనవి చేయడం ఏమనగా తేది 13.03.2015 మరియు 14.03.2015 లలో హైదరాబాద్ లో జరిగే ప్రజాబిప్రాయ సేకరణ కార్యక్రమము లో పాల్గొనుట గురించి అనుమతించగలరు</p>	<p>లైసెన్స్ పరిధిలో లేని అంశము.</p>

S.No	Summary of Objections / Suggestions	Response of the Licensee
158. Dr P.Ramadevi, F.No. 802, Saisagar Height, Patigadda Colony, Begumpet, Hyderabad-Phone No. 9704443030		
1.	<p>విద్యుత్ మరణాల విషయంలో మన రాష్ట్రం లో అధికంగా జరుగుతున్నాయి . గత సం 436 అయితే 2015-16 కు 216 గా మీరు ఇవ్వడం జరిగింది. ఈ విధంగా మరణించిన వారికి exgratia లక్ష నుండి 2 లక్ష లకు పెంచారన్నారు. కాని రైల్ యాక్సిడెంట్ లో చనిపోయిన వారికి 5 లక్షలు ఇస్తున్నారు. ఈ మరణాలకు భాద్యత ప్రభుత్వానిదే కాబట్టి వీరికి 5 లక్షలు ఇవ్వడమే కాకుండా గాయపడిన వారికి కూడా తప్పనిసరిగా ఆర్థిక సహాయం చేయాలి</p>	<p>గత సంవత్సరంలో అనగా 2013-14 విద్యుత్ ప్రమాదాల వలన 331 మంది మరణించారు మరియు 2014-15 నందు జనవరి నెల వరకు 259 మంది మరణించారు.</p> <p>విద్యుత్ ఘాతముతో మరణించినవారికి రూ: 2 లక్ష నష్టపరిహారం ఇవ్వడం జరుగుతుంది.</p>

2	<p>ఏదైతే 5-6% charges పెరిగాయో వాటికో ఎన్నో కారణాలు ఉంటే దానికి ప్రజల మీద కుడ్పటం చాల అమానుషం. మీరు ఏదైతే 282 కోట్ల మీరు తీసుకున్న 2450 కోట్లకు వడిని ప్రజల మీద రుద్దటం . దిని విషయం లో ప్రభుత్వం ఆలోచించాలి</p>	<p>సెంట్రల్ గవర్నమెంట్ వారు ఆర్థిక పునర్నిర్మాణం ప్రణాళిక లో పేర్కొన్న అంశాల లోసఫలీకృతం అయిన దానిని బట్టి, ఫైనాన్సు పరివర్తన విధానం (Transitional Finance Mechanism) ద్వారా ఆర్థిక పునర్నిర్మాణం ప్రణాళిక (ఫ) తోడ్పాటు అందిస్తారు .ఫైనాన్సు పరివర్తన విధానం (Transitional Finance Mechanism) లో క్రింది అంశాలు కలవు.</p> <ol style="list-style-type: none"> 1. RAPDRP కింద పేర్కొన్న నష్టాలు కంటే AT & C నష్టం తగ్గింపు ద్వారా ఆదా చేసిన అదనపు శక్తి విలువకు సమానంగా గ్రాంట్ రూపంలో ద్రవ్యత మద్దతు అందించడం. 2.రాష్ట్ర ప్రభుత్వం తీసుకున్న బాధ్యత (liabilities)లో 25% మూల ధనాన్ని చెల్లించడం ద్వారా ప్రోత్సాహకాన్ని ఇవ్వడం. <p>FRP స్కీం లోని అంశాలు</p> <ol style="list-style-type: none"> 1.టారిఫ్స్ సెట్టింగ్ మరియు రెవిన్యూ రియలైజేషన్ 2. రిలీజ్ అఫ్ సబ్సిడీ 3. మీటరింగ్ మెజర్స్ 4. ఆడిట్ అఫ్ అకౌంట్స్ 5.ఫైనసియల్ పెర్ఫార్మన్స్ ఇంప్రూవ్మెంట్
---	--	--

S.No	Summary of Objections / Suggestions	Response of the Licensee
159. Pasya Padma, 1-1-385/12/17/1 Pranav Residency, F.No304, New Bakaram, Gandhi Nagar, Hyderabad-500020. Cell No.9866102497		
1.	Don't hike electricity charges	<p>In the Tariff Order for FY 2013-14, the average Cost to Serve (CoS) as approved by the Hon'ble Commission for the Telangana was Rs 5.46/Unit. Since then, there has been a significant increase in the average CoS during the year and the licensee expects the trend to continue for the ensuing year.</p> <p>The Licensee estimates the state level CoS for the year FY 2015-16 to be at Rs. 5.98/Unit. This implies that an increase of Rs.0.52/ Unit (10 % increase)</p> <p>The increase in the CoS is due to the following reasons</p> <ol style="list-style-type: none"> 1. The Network cost approved in FY 13-14 was Rs. 0.83/Unit and this has increased to Rs. 1.00 /Unit primarily due to increase in wages of employees, increased Capital Investment of the licensee. 2. The interest costs on the short term loans converted to Long term loan under Financial Restructure plan amounts to Rs. 141 crores has also increased the ARR in FY 2015-16. 3. The Licensees has projected a consolidated revenue deficit for FY 13-14 and FY 14-15 to the tune of Rs. 1463 Crs. The high revenue deficit for the period is primarily due to increase in Power Purchase cost, Network cost and other cost in FY 14-15 and no tariff revision in FY 14-15.
2	Capacitors should be fixed by Govt to small formers	836 Numbers of 2MVAR Capacitor Banks at 33/11Kv sub station are installed and inservice. Further 216 Nos Capacitor banks will be commissioned within a year
3	5 lakh exgratia for electricity shock deaths	Rs.2 Lacks compensation is paid to non-departmental fatal accident.

4	Minimize cost of production of electricity and supply for low charges to poor people	Cost of supply mainly depends on the power purchase cost. As it is increasing year on year, it is inevitable for the Discom to enhance the tariffs. However taking into consideration of the poor people Discoms have not proposed any increase for the domestic consumers with consumption below 100 units and agriculture consumers. For other consumers also Discom proposed a minimal increase in tariffs .
5	Free electricity to small farmers	As per the Government policy and the Tariff Order issued by the Hon'ble Commission, the free supply is extending to farmers.

S.No	Summary of Objections / Suggestions	Response of the Licensee
	<p>160. A.Surendar Reddy, F.No.102, E.C.L. Veera Apartments, C-Block, Prashanti Nagar, Kondapur, Sherlingam Pally. Phone No. 8142724444</p> <p>161. Kaveti Ramulu Flat No. 402, Salim Nagar Colony, Malak Pet, Hyderabad. Phone no. 8886612415</p>	
1.	<p>T S విద్యుత్ నియంత్రణ మండలిలో ఆంధ్ర ఉద్యోగులను తీసుకోవడం జరిగినది. దీనితో తెలంగాణా ఉద్యోగులకు అన్యాయము జరగడమే కాకుండా విద్యుత్ నియంత్రణ మండలి తీసుకున్న నిర్ణయం కూడా ముందే వారు ఆంధ్ర వారికి తెలియజేసే అవకాశం ఉంటుంది. కావున ఆంధ్ర ఉద్యోగులను విషయం కుణ్ణంగా పరిశీలించి తగు నిర్ణయం తీసుకోగలరని ప్రార్థిస్తున్నాను</p>	<p>లైసెన్స్ పరిధిలో లేని అంశము.</p>

S.No	Summary of Objections / Suggestions	Response of the Licensee
	<p>162 పర్మాద అంజిరెడ్డి, భారతీయ కిసాన్ సంఘ్ అధ్యక్షులు, 2-1-174 &175/G2, నల్లకుంట, హైదరాబాదు, ఫోన్ నెం. 9491781566</p> <p>163 M Sreedha Reddy, 2-1-174/504,Nallakunta,Hyd</p>	
1.	<p>L.T-VA వ్యవసాయ కనెక్షన్ కు సంబంధించి తరి భూమి 2.5 ఎకరాల కన్నా ఎక్కువగా ఉంటే డిమాండ్ చార్జి 525 రూ. సం.మునకు ఒక హెచ్.పి.కి. మరియు యూనిట్ కు 0.50 పై. విద్యుత్ చార్జి అని గత టారిఫ్ ప్రకారంగా ఉంది. ఇప్పుడు కూడా అదే ధరలను ప్రతిపాదించారు. L.T-VA టారిఫ్ క్యాటగిరి లో తెలంగాణ రాష్ట్రం మొత్తం అంతా కలిసి 2 కోట్లు ఆదాయం కూడా లేదు. ఈ మొత్తం ఆదాయ అవసరాల్లో అతి స్వల్పమే కానీ ఈ నిబంధనను అడ్డు పెట్టుకోని క్షేత్ర స్థాయి సిబ్బంది అమాయకులైన రైతులను వేధిస్తున్నారు. వేల కోట్ల రూపాయలను ఖర్చు పెట్టి నీటి ప్రాజెక్టులు కట్టిన చోట 2.5 ఎకరాల కన్నా ఎక్కువ మాగాణి ఉన్న రైతులకు కూడా నీటి తీరువా లేదు. అలాగే ప్రభుత్వ ఎత్తిపోతల పథకాల విషయంలో మొత్తం బిల్లులు ప్రభుత్వమే చెల్లిస్తుంది. ఇటువంటి నిబంధన లేదు. కావున తమరు రైతాంగ సమస్యలను గుర్తించి క్షేత్ర స్థాయి సిబ్బంది ఒత్తిడి నుండి రైతాంగాన్ని రక్షించడానికి ఈ నిబంధనను ఎత్తి వెయగలరని ప్రార్థిస్తున్నాము.</p>	<p>గవర్నమెంట్ వారి పాలసీ ప్రకారం మరియు గౌరవ కమిషన్ వారి టారిఫ్ ఆర్డర్ ప్రకారం, వ్యవసాయ వినియోగ దారులకు విద్యుత్ చార్జీలు వసూలు చేయడం జరుగుతోంది.</p>
2.	<p>2 సంవత్సరాల క్రితం జరిగిన బహిరంగ విచారణలో ప్రస్తుత మన రాష్ట్ర మంత్రివర్గులైన శ్రీ తన్నీరు హరీష్ రావు గారు ల్యాంక్ కంపెనీకి సంబంధించి స్వల్పకాలిక విద్యుత్ కొనుగోలు</p>	<p>APPCC వారు చేసిన స్వల్పకాలిక విద్యుత్ కొనుగోళ్లపై గౌరవనీయులైన శ్రీ టి.హరీష్ రావు గారు లేవనెత్తిన అభ్యంతరాలు ఆధారంగా, APPCC వారు అదనంగా చెల్లించిన</p>

<p>విషయంలో ఒప్పందాల కన్నా కోట్లాది రూపాయలు ఎక్కువ చెల్లింపులు డిస్కంలు చేసినవి. వాటిని తిరిగి రాబట్టడమే కాకుండా బాధ్యులైన అధికారులపై మరియు ల్యాంకో కంపెనీపై క్రిమినల్ కేసులు పెట్టాలని డిమాండ్ చేశారు. మేమందరం ప్రజా ప్రయోజనాల దృష్ట్యా వారికి మద్దతు తెలిపి చర్యలు తీసుకోవాలని బహిరంగ విచారణలో డిమాండ్ చేయడం జరిగింది. ప్రస్తుతం మన ఇంటి ప్రభుత్వం ఉంది, చర్యలు డిమాండ్ చేసిన టి. హరీష్ రావు గారు మంత్రి కూడా అయినారు. ల్యాంకోకు జరిపిన అక్రమ చెల్లింపుల విషయం డిస్కంలు కాని, ప్రభుత్వం వారు కానీ తీసుకున్న చర్యలు ఏమీ తెలపాలి. ఈ విషయంలో ప్రస్తుతం ఆంధ్రా లాబీయింగ్ ఒత్తిడి కూడా లేదు. కావున నిజానిజాల గురించి స్పష్టమైన ప్రకటన డిస్కంలు చేయాలి. విద్యుత్ నియంత్రణ మండలి వారు తమ వైఖరిని ఈ విషయంలో స్పష్టం చేయడమే గాకుండా ప్రస్తుత తెలంగాణ ప్రభుత్వ వైఖరి ఏమిటి అనేది ప్రభుత్వం ద్వారా సమాధానం ఇప్పించి ప్రభుత్వం మరియు డిస్కం పారదర్శకతను నిరూపించి, గత ప్రభుత్వంలో ఉన్న పారిశ్రామిక వేత్తలైన ఆంధ్రా పెత్తం దారులు జరిపిన నష్టాలు బయట పెట్టాలని తమరికి విన్నవించుకొంటున్నాను.</p>	<p>Rs.12,12,18,314/- మొత్తాన్ని తీసివేసారు. దీనిపై NETSL (National Energy Trading & Service Limited) వారు ఆంధ్ర ప్రదేశ్ గౌరవనీయ హైకోర్టు ముందు పిటిషన్ WPN0.17631 ఆఫ్ 2013 దాఖలు చేశారు. గౌరవనీయ హైకోర్టు NETSL అనుకూలంగా ఉత్తర్వులు జారీ చేసింది.</p>
<p>3 నెలకు 100 యూనిట్ల కన్నా తక్కువ విద్యుత్ వినియోగించే గ్రామీణ /పట్టణ సామాన్య చిన్న హోటల్ వారికి యూనిట్ కు రూ.7.80 పై.-100 యూనిట్లు దాటితే రూ.8.60 పైసలు అదే రాజీవ్ గాంధీ ఇంటర్నేషనల్ ఎయిర్ పోర్ట్ లో ఉన్న స్టార్ హోటల్ కు యూనిట్ కు రూ6.05 పైసలు ఎంత సబబో తమరు ఆలోచించి నిర్ణయం తీసుకోవాలి.</p> <p>రాజీవ్ గాంధీ ఇంటర్ నేషనల్ ఎయిర్ పోర్ట్ కు (ఇందులో సింహ భాగం వాటా జి.ఎం.ఆర్.సంస్థది) గత రెండు సంవత్సరాల క్రింద కమర్షియల్ కేటగిరి నుండి ప్రజా ట్రాన్స్</p>	<p>కమిషన్ వారు ఆమోదించిన టారిఫ్ ఆర్డర్ లోని నియమ నిబంధనల లోబడి లైసెన్సీ వారు విద్యుత్ చార్జీలు వసూలు చేయు చున్నారు. వినియోగ దారుల వర్గీకరణము కమిషన్ వారు నిర్దేశించిన విధముగా జరుగుతోంది. హెచ్. టి. III కేటగిరి వినియోగ దారులకు లైసెన్సీ వారు ఎనర్జీ చార్జీలు రూ 6.05 తో పాటుగా ఫిక్సెడ్ చార్జీలు రూ. 370.17 / కె.వి.ఎ ప్రతి పాదించడంఅయినది. మరియు వీరికి అదనంగా టైం ఆఫ్ డే చార్జీలు రూ. 1.00 కూడా</p>

	<p>పోర్ట్ సంస్థలైన ఆర్.టి.సి. మరియు రైల్వే ల సరసన చేర్చి వారికి సంబంధించిన విద్యుత్ చార్జీ తగ్గే వెసులుబాటు కల్పించారు.రాజీప్ గాంధీ ఇంటర్నేషనల్ ఎయిర్ పోర్ట్ వారు 5400 ఎకరాల రైతాంగపు భూములను ప్రభుత్వము ద్వారా సేకరించి ఎయిర్ పోర్ట్ సేవల్ కాకుండా స్టార్ హోటల్స్ మొదలుకొని వివిధ వ్యాపార సంస్థల ద్వారా అత్యధిక ధరలను దేశ విదేశీ వినియోగదారుల నుండి వసూలు చేస్తున్నారు.(100 కోట్ల ఖర్చు చేసిన ఒక పెళ్లి రాజీప్ గాంధీ ఇంటర్ నేషనల్ ఎయిర్ పోర్ట్ స్టార్ హోటల్ లో జరిగిందని పత్రికల ద్వారా చదివాము.) . టీ నుండి మొదలుకొని పార్కింగ్ వరకు వీరి వద్ద ఏ సేవలైనా అధిక ధరలే. స్టార్ హోటల్స్ లో కోట్లాది రూపాయలు ఖర్చు చేసే ధనికులు వివిధ ఫంక్షన్ లు చేసుకుంటారు. ఇది పక్కా వ్యాపారమే కాదు కదా కాస్టీ వ్యాపారం కూడా. దానిని పేద,సామాన్య,మధ్య తరగతి ప్రజలకు సేవ చేసే ఆర్.టి.సి., రైల్వే లతో ఎలా పోలుస్తారు. ఆర్.టి.సి., రైల్వే పార్కింగ్ రూ.5/- నుండి రూ.10/-, టీ , రూ.5/- నుండి రూ.7/-లు బస్సు,రైల్ దొరకకుంటే రాత్రి ఉచితంగా ప్లాట్ ఫాం పై పడుకోవచ్చును. ఇలాంటి సేవలు ప్రజలకందిస్తూ ప్రజాభిమానాన్ని చూరగొన్న సంస్థల సరసన జి.ఎం.ఆర్.ఎయిర్ పోర్ట్ ను చేర్చి ఈ సంస్థల గౌరవాన్ని, సేవా నిరతిని తగ్గించారు. గౌరవ విద్యుత్ నియంత్రణ మండలి వారు దానిపై పునరాలోచన చేసి రాజీప్ గాంధీ ఇంటర్ నేషనల్ ఎయిర్ పోర్ట్ లో ఎన్నో వ్యాపార సంస్థలున్నవి, వాటి సేవలు ఏమిటి పరిశీలించి వాటి సేవల ఆధారంగా , వారు వినియోగదారులపై వసూలు చేసే టారిఫ్ ఆధారంగా టారిఫ్ నిర్ణయించాలని తమరికి విన్నవించు కుంటున్నాము</p>	<p>ప్రతిపాదించడం జరిగింది.</p>
4	<p>సి.జి.ఆర్.ఎఫ్.సభ్యులతో సహా ఉన్నతాధికారులందరూ తమ తమ వాహనాలలో ఎన్ని కి.మీ.లు ప్రయాణం చేయడానికి అనుమతి ఉంది. ఎన్ని కి.మీ.ప్రయాణం</p>	<p>TSSPDCL వారు కమిషన్ వారి రెగ్యులేషన్ నం.1/2004 కు సంబంధించిన సవరణ (అమెండ్మెంట్) తేది 01.10.2007 లోని క్లాజ్ 5(14) ను పాటిస్తున్నాం</p>

చేస్తున్నారు.సి.జి.ఆర్.ఎఫ్.సభ్యులు వీరి హెడ్ ఆఫీసు నుండి వారు హియరింగ్ వెళ్ళే స్థానానికి ఒక కారులో అందరూ వెళ్తున్నారా? లేదా ఎవరి కారు వారు వాడుతున్నారా? సి.జి.ఆర్.ఎఫ్. వినియోగదారుల సభ్యునికి కల్పించిన ప్రయాణ వెసులుబాటు ఏమిటి? వినియోగ దార సభ్యుడు డిస్కం సభ్యులు సమానమేన? లేక తేడా ఏమైనా ఉందా? వినియోగదారునికి (ఎస్.పి.డి.సి.ఎల్) చెల్లించాల్సిన ప్రయాణపు ఖర్చులను గత రెండు సంవత్సరాలుగా రక రకాల కారణాలు చూపి చెల్లించక మానసీకంగా క్షోభ పెట్టే విచారణకు రాకుండా చేయడాన్ని డిస్కాం పెద్దలు సమర్థిస్తున్నారా? గౌరవ విద్యుత్ నియంత్రణ మండలి వారు విచారించి ఇ.ఆర్.సి. వారు నియమించిన సభ్యుని గౌరవాన్ని కాపాడుతూ ఆర్థికంగా కూడా అసమానం కాకుండా చూడగలరని ప్రార్థిస్తున్నాము.

Annexure - I

SOUTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED

O/o. the Chief General Manager (Commercial),
TSSPDCL, Ground Floor, Corporate Office,
Mint Compound, Hyderabad.

Memo No. CGM (Comml)/ SE(C)/ DE(C)/ADE-III /D.No.2792/14, Dt:11-03-2015

Sub:- TSSPDCL- Comml -Conversion of Paying category to Free category agriculture consumers - Revised Instructions issued - Reg.

Ref:- 1. Lr.No.CP/CGRF-2/Agri Sevcies/2011-12/D.No.1219/12, Dt.04.04.2012,
2. Memo.No.CGM(C)/SE(C)/DE(C)/ADE-III/D.No.1096/13, dt. 27.06.2013.

□□□□□

All the Superintending Engineers/Operation Circle are requested to comply following instructions for conversion of paying category to free category agriculture consumers:

A. Following have to be observed for categorizing Agricultural Consumers under Corporate Farmers & IT Assesses

- i) Corporate farmers: Companies registered under the companies act, partnership act, societies act (or) under any other applicable legislation, trust act and any other bodies corporate that may be notified from time to time.
- ii) IT Assesses : Income tax assesses owning agriculture land.

B. Documents / Certificates to be verified

1. **Physical Inspection Report:-**

- a. Inspection report of AE/Operation duly counter signed by ADE/Operation and DE/Operation. The inspection report should indicate whether the consumer is following DSM Measures or Not, as given in Tariff Order.

2. **Income of the Consumer:-**

- a. Latest Income Certificate issued by the Tahsildar /MRO or 4(d)

3. **Land Holding of the consumer:-**

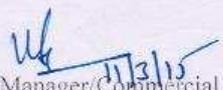
- a. Patta Pass Book of the Consumer or MRO certificate, Extent of wet land, no. of electrical connections of dry land has to be certified by local MRO/Tahsildar.

4. **Affidavit by the Consumer on Non-Judicial Stamp Paper declaring that:-**

- a. He is not an Income Tax Assessee
- b. No. of acres of Land Holdings in his name
- c. No. of Agriculture Services in his name
- d. Self income declaration.

On receipt of the proposal from the concerned DE/Operation and based on the certificate, issued by MRO, Patta Pass Books, Income Certificates, AE/ADE/Operation Inspection report, DE/Operation recommendation, the Superintending Engineer / Operation / and SAO/Operation may review and take a decision to change the category (paying to free) and may withdraw the excess demand raised, if any on account of wrong categorization with proper verification & certification.

All such cases shall be reported to the Chairman & Managing Director on quarterly basis without which the transaction shall not attain finality.


Chief General Manager/Commercial

To:
All the Superintending Engineers/Operation/
All the Senior Accounts Officers/Operation/

Copy to: The Chair Person/CGRF-I & CGRF-II
H.No.8-3-970, Plot No.132, 4th Floor,
Sri Sai Complex, Near HDFC Bank, Srinagar Colony, Hyderabad.

D:\2014\Guidlines on Agl. Paying - Free Cat\Memo-1-Revised -Conversion Pay to Free Cat.doc