



The Federation of Telangana Chambers of Commerce and Industry

(Formerly known as FTAPCCI)

ISO 9001:2015

Empowering Industry, Commerce & Trade

Registered under the Companies Act, 1956

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Anil Agarwal
President

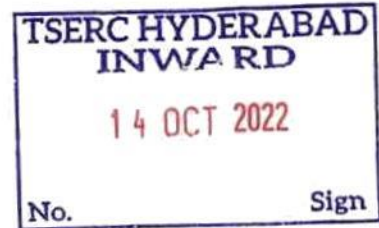
Meela Jayadev
Senior Vice President

Suresh Kumar Singhal
Vice President

FTCCI/Energy/2022-23/143

October 14, 2022

To
The Secretary,
Telangana State Electricity Regulatory Commission (TSERC)
5th Floor, 11-4-660, Singareni Bhawan
Red Hills, Hyderabad - 500004



Subject: 1) Seeking direction to the TSSPDCL and TSNPDCL for submitting data/information.

Reference: 1. Letter to TSERC dt. 29.08.2022 seeking relevant information and time extension for filing objections/comments to the TS Discoms' True-up Petition for Distribution Business from FY 2006-07 to FY 2020-21.
2. Public Notice dt. 06.09.2022 pertaining to True-up Petitions of Distribution Business of TSSPDCL and TSNPDCL for FY 2006-07 to FY 2020-21 filed in the TSERC

Dear Sir,

Referring to the subject cited, you are aware that the two discoms in Telangana, namely, TSSPDCL and TSNPDCL have submitted some additional information in regard to True-up Petitions for their Distribution Business for FY 2006-07 to FY 2020-21. Vide this letter, we would like to bring to your notice that the submitted additional information is lacking in terms of details/data/justification/documentary evidence as sought by the Objector (vide the Objector's letter dt. 29.08.2022).

The following is the status of details/data/justification/documentary evidence sought by the Objector vide letter dt. 29.08.2022 versus the information made available by the Petitioners.

S.No.	Information/Document sought by Objector	Information Submitted by TS Discoms		Submitted Attachment
	From FY 2006-07 to 2020-21	TSSPDCL	TSNPDCL	Availability Status
1	Formula linked workable excel model for True up Petitions	Submitted	Submitted	Available
2	Mapping of each Financial Certificate with associated work and cost	Not Submitted	Not Submitted	-

S.No.	Information/Document sought by Objector	Information Submitted by TS Discoms		Submitted Attachment Availability Status
	From FY 2006-07 to 2020-21	TSSPDCL	TSNPDCL	
3	Complete set of Audited Reports/Accounts	Not Submitted	Submitted	Made available only by TSNPDCL
4	Formula-linked workable excel model of Fixed Asset Register for every year	Not Submitted	Not Submitted	-
5	Reconciliation Statements for each year from FY 2006-07 to FY 2020-21 of the True-up Amounts for each ARR element claimed with the Audited Reports/Accounts	Not Submitted	Mapping not provided in submitted document nor in excel format	Not provided as per the necessary format
6	All Actuarial Valuation Reports for TSNPDCL and TSSPDCL	Not Submitted	Not made Available	Not Available (Annexure VII, X & XIII)
7	Detailed Report on Wage Revision Impact	Not Submitted	Not made Available	Not Available (Annexure VI, IX & XII)
8	Detailed explanation with supporting documents for increase in Repair and Maintenance	Not Submitted	Submitted	Available
9	Detailed explanation with supporting documents for increase in Administrative and General Expenses for TSNPDCL and TSSPDCL	Not Submitted	Not made Available	Not Available (Annexure XI)
10	All Tax Evaluation Reports and Tax Assessment Orders	Not Submitted	Not made Available	Not Available (Annexure IV)
11	All Orders of the Hon'ble TSERC in O.P. No's 39, 40, 41, 42, 43, 44, 45 and 46 of 2021 along with I.A. No's 12, 13, 14, 15, 16, 17, 18 and 19 of 2021 and O.P. No. 20 of 2022 and O.P. No. 22 of 2022;	Not Submitted	Not made Available	-
12	Additional Attachments not provided by Discoms			
A	Annexure regarding allocation of Non-Tariff Income	Not Submitted	Not made Available	Not Available (Annexure V)
B	Annexure regarding Copies of clarification issued by Ministry of Power in regard of deviation from the UDAY MoU	Not Submitted	Not made Available	Not Available (Annexure XV)
C	Annexure regarding the details of capacity wise DTRs	Not Submitted	Not made Available	Not Available (Annexure XVI)

It is prayed that the Hon'ble Commission may direct TSSPDCL and TSNPDCL to provide the above-listed Annexures/details/data/justification/documentary evidence to the Objectors and Stakeholders and to make the same available in the public domain.

Furthermore, there is a clear non-adherence to Tariff Regulations, 2005 and Investment approval guidelines by TS discoms which has been already pointed out in detailed manner in the submitted Objections Report.

If the Petitioners fail to prove absolute compliance to the Hon'ble Commission's Tariff Regulations, it is prayed that the Hon'ble Commission may reject the instant Petitions in limine.

Notwithstanding the above it is also prayed that the Hon'ble Commission may conduct the Public Hearing one week after the submission of above illustrated information.

The Federation of Telangana Chambers of Commerce and Industry (FTPCCI) requests that the Hon'ble Commission may give due consideration to the severity of the situation and accordingly allow the prayers made by FTCCI and issue appropriate directions/orders

Thanks, and Regards

Yours sincerely,
(For FTCCI)



T. Sujatha
Deputy CEO, FTCCI