

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

**July 16, 2021**

**Respected Sir,**

**Sub : Final submissions in O.P.No.10 of 2016 relating to PPA between NTPC and TS Discoms for supply of power from Telangana Super Thermal Power Project phase I (2x800 MW) at Ramagundam**

**Further to my submissions dated 15.6.2021, and oral submissions I made during public hearing on 14.7.2021 and in response to the responses of the Discoms dated 12.7.2021 to my written submissions, I am submitting the following points in the subject issue for the consideration of the Hon'ble Commission:**

- 1. I thank the Hon'ble Commission for positively responding to our request and posting the public hearing on 20.7.2021 to give time to objectors to study the responses received from the Discoms just before the eleventh hour and make further submissions.**
- 2. In their replies to my written submissions dated 12.7.2017, the Discoms informed that NTPC expressed its inability to carry out the amendments to the subject PPA contrary to the standard/existing PPAs it had already entered with Discoms of different States, in respect of other NTPC projects. In view of the interim order of the Hon'ble Commission directing to incorporate the amendments to the terms of the PPA given in its interim order dated 30.7.2016, when did NTPC express its said inability? Did any discussions on the issues take place between TS Discoms and NTPC? If so, the correspondence between the parties, and minutes of their discussions, if recorded in writing, should be submitted by TS Discoms and examined to ascertain the specific stand taken by the Discoms on each point. Whatever be the terms in the standard/existing PPAs NTPC had with various Discoms of different States for supplying power from its respective stations, they are not binding on the Hon'ble Commission. In other words, simply because NTPC has been riding roughshod over the power utilities of the States by literally dictating to them, as in the subject case, to sign on the dotted lines in the PPAs prepared by it, the Hon'ble Commission need not go by the same and give its consent to the subject PPA. Moreover, the dangerous implication in such a highly questionable approach of NTPC is that the Hon'ble Commission should give its consent to the PPA as signed and submitted by the parties thereto. In such a case, the regulatory role of the Hon'ble Commission gets reduced to simply putting its stamp of approval on the PPA. With such intransigent and unreasonable approach, is NTPC entertaining the illusion that it can ride roughshod over the Hon'ble Commission just as it has been doing in the case of power utilities of the States? The Hon'ble Commission has every authority to direct the parties to the PPA to amend it as directed by it. For example,**

Hon'ble APERC returned the PPA of BPL project at Ramagundam three times with such directions and finally gave its order. Also, APERC directed BSES gas-based power project to amend its PPA with AP Discoms in a way different from the terms in the PPAs of some of the other gas-based power projects like GVK I and Spectrum.

3. The Discoms argued that the legal position on the order of priority is that the Electricity Act, 2003, the Regulations made thereunder, & PPA would follow the sequence and in case PPA terms & conditions are inconsistent with CERC tariff Regulations, to the extent of inconsistency, CERC Regulations will prevail over the PPA provisions. Therefore, NTPC expressed its inability to deviate from the CERC tariff Regulations as well as MoP directions, the Discoms argued. Hon'ble TSERC is an independent quasi judicial body just as CERC is. The regulations of CERC are not binding on the Hon'ble Commission. TSERC can adopt regulations of CERC or take an independent decision as per its applicable regulations and exercise its discretionary powers as well to deviate from the regulations for reasons to be recorded in writing. Similarly, the directions of Ministry of Power, GoI, to NTPC are not binding on the Hon'ble Commission.
4. Regarding the jurisdiction for determination of tariff for the subject project, the Discoms did not respond to the points raised in my written submissions. The responses of the Discoms and the legal opinion obtained by them on the issue failed to take into consideration the context and spirit of A.P. Reorganisation Act, 2014. The observations of the Hon'ble Supreme Court quoted by the Discoms that "the doctrine of comity or amity requires a court not to pass an order which would be in conflict with another order passed by a competent court of law ..... 19. A court while exercising its judicial functions would ordinarily not pass an order which would make one of the parties to the lis violate a lawful order passed by another court" seem to be quoted out of context, for, they do not apply to the issue of jurisdiction of TSERC and CERC in the subject issue. An order given by a lower court is being set aside by a higher court; an order given by a single judge or a bench is being set aside by a division bench or higher bench of the same court; orders given by High Courts are being set aside by the Supreme Court; orders of SERCs and CERC are being set aside by APTEL; and APTEL's orders are being set aside by the Supreme Court. There have been several instances to this effect. Moreover, going by the logic of the observations of the Supreme Court, if the Hon'ble TSERC gives its approval to the subject PPA, CERC should not give its order contrary to the terms of the PPA while determining tariff of the subject project.
5. The contention of the Discoms and in the legal opinion obtained by them that the A.P. Reorganisation Act mandated "NTPC to establish a 4000 MW power facility in the successor State of Telangana after establishing necessary coal linkages" and that no mention was made therein about allocation of power cannot be interpreted mechanically to mean that 100% capacity of the project need not be allocated to Telangana. For establishing a power project by NTPC in any State, no Act by

Parliament is required. No such mandate need to be incorporated in any such Act of the Parliament. The very fact that such a mandate is incorporated in the A.P. Reorganisation Act and that 85% of the capacity of the subject project is already allocated to Telangana, that, too, contrary to the guidelines of allocation of power from CGSs by MoP, GoI, shows that in order to overcome shortage for power in the State of Telangana when it was formed, bifurcating the then Andhra Pradesh, the subject project is intended for Telangana. The same yardstick should be applied for allocating the balance 15% also to Telangana.

6. When the Discoms referred to my earlier submission that “as raised by the objector, in the case of Simhadri TPP Phase-I of NTPC, though the entire capacity (2x500 MW) was allocated to the united A.P.State, yet CERC determined the tariff of the said project,” they simply misconstrued the purport of my submission. Though the then AP Discoms committed a mistake by not approaching APERC for its consent to the PPA between them and NTPC relating to Simhadri TPP phase I of NTPC, the TS Discoms approached TSERC seeking its consent to the subject PPA. I did not find fault with the TS Discoms for approaching this Hon’ble Commission seeking approval to the subject PPA, as I underlined the qualitative difference between the approaches of the then AP Discoms and the present TS Discoms.
7. The Discoms maintained that “Tariffs of generating companies under section 79 – The tariff determined by the Central Commission for generating companies under clause (a) or (b) of sub-section (1) of section 79 of the act shall not be subject to re-determination by the State Commission in exercise of functions under clauses (a) or (b) of sub-section (1) of section 86 of the Act and subject to the above the State Commission may determine whether a Distribution Licensee in the State should enter into Power Purchase Agreement or procurement process with such generating companies based on the tariff determined by the Central Commission.” In such a case, NTPC should first get tariff order, provisionally or finally, from CERC. Then only, keeping the tariff determined by CERC in view, the Hon’ble TSERC can determine whether TS Discoms should enter into a PPA with NTPC to purchase power from the subject project based on relevant factors like reasonableness of the tariff determined by CERC, and whether power from other sources can be contracted at relatively lower tariffs, etc., and even reject consent to the subject PPA. Then, without the NTPC first approaching CERC for determination of tariff, provisionally or finally, why are the TS Discoms approaching the Hon’ble TSERC for approval of the PPA? Is it to avoid taking into consideration by TSERC of reasonableness or otherwise of the tariff to be determined by CERC, and by first getting approval of TSERC to the subject PPA, without determination of tariff by CERC, to make it a fait accompli?
8. The Discoms submitted that “no consensus was arrived between TSDISCOMs & NTPC on the directions given by TSERC and this led to a standstill in the discussions. Meanwhile, the Members and Chairman of this Hon’ble Commission demitted the Office, followed by Covid Pandemic restrictions and therefore parties could not proceed in the matter. The inordinate delay occurred in signing the

Supplementary PPA with NTPC is because of the factors/events beyond the control of the Parties.” Before the Hon’ble TSERC became defunct with the posts of Chairman and Members remaining unfilled, from the date of the interim order given by the Hon’ble Commission in 2016 till the Commission became defunct, the gap has been very long and there has been no justification for the inordinate delay in signing and filing the supplementary PPA seeking consent of the Commission during that period. The Discoms failed to explain what those factors and events which were beyond the control of the parties to the PPA which are being claimed as the reasons for such inordinate delay. The delay must be deliberate, because, NTPC might be entertaining the apprehension that, if the amended PPA was submitted to the then Commission which gave the interim order, its final order might not be favourable or palatable to NTPC.

9. Regarding need for incorporating a clause in the PPA providing for payment of penalty by NTPC to the Discoms when NTPC fails to generate and supply power, fully or partly, the Discoms argued that in such a case, “DISCOMs will not make payment of Energy charges also as there would be no generation and this will also be a saving to DISCOMs. As such, the Tariff Regulations framed by CERC or TSERC have not stipulated any such penalty for incorporation in the PPA. Without such penalty stipulation in the Tariff Regulations, it may not be possible for deviating the Regulations and for incorporation of penalty clause in the PPAs as Regulation will override the PPA provisions in case of inconsistency.” When NTPC fails to generate and supply power, fully or partly, to the Discoms, the argument that non-payment fixed charges and variable charges proportionate to such short-supply of power will also be a saving to Discoms is amusing. When a PPA is entered into by the Discoms with a generator of power, it is to get supply of power to meet requirements of demand, not for non-supply of power and so-called saving. If the argument of the Discoms is extended to its absurd extent, that, if generators fail to supply power as per PPAs, non-payment of tariffs, both fixed and variable, by the Discoms would be a saving to the latter, it defeats the very purpose for which PPAs are entered into. Can the Discoms be content with the so-called savings in such a situation, ignoring the kind of serious problems they have to face for meeting demand for power of their consumers? The Discoms failed to respond to our submission that, just as the Discoms have to pay fixed charges to NTPC for backing down capacity of the subject plant when the Discoms do not require power from it, NTPC, too, should pay penalty to the Discoms when it fails to generate and supply power in order to compensate the additional burdens the Discoms have to bear for purchasing power from other sources at higher costs to meet demand. The implication in the arguments of the Discoms is that, for the failure of Discoms to take power from NTPC, they have to pay penalty in the form of fixed charges to NTPC, but if NTPC fails to supply power to the Discoms, it need not pay penalty to the Discoms; it is self-defeating, as it does not protect interests of the Discoms and their consumers. Precisely because there is no provision in the regulations for imposing penalty on NTPC for its failure to generate and supply power to the Discoms, we suggested and the Hon’ble Commission directed in its interim order to amend the terms of the PPA accordingly. When the Discoms are arguing that “it

may not be possible for deviating the Regulations,” they are questioning the discretionary power of the Hon’ble Commission which is specifically incorporated in every regulation that the Commission can deviate from the regulations for reasons to be recorded in writing. Absence of a provision like this in regulations does not mean that the Commission cannot direct the parties to PPA to incorporate such a provision in the PPA concerned by amending it accordingly. Moreover, there is no regulation which prohibits imposition of a penalty on a generator for the latter’s failure to supply power to the Discoms as per PPA. Therefore, the said direction of the Hon’ble Commission to amend the subject PPA is intended to correct a glaring deficiency in the regulations in a fair, rational and balanced way to ensure equity in terms of ensuring liability on both sides to the PPA for their respective failures. Otherwise, the PPA should be amended to remove the clause providing for payment of fixed charges by the Discoms to NTPC for backing down capacity of the subject plant.

10. Regarding the amendment that the Hon’ble Commission directed the parties to the PPA to incorporate a provision facilitating the TS Discoms to issue notice of termination on par with NTPC, the arguments of the Discoms are untenable. Other PPAs of NTPC contained such one-sided provisions is no justification for the same. Uniformity is no virtue when it contains elements of inequity, one-sidedness and irrationality. The Discoms also failed to explain how incorporation of the said amendment is unacceptable and how it would cause any difficulty or harm to NTPC. A PPA should ensure equity and balance in terms of rights and obligations, and interests of both sides. In the name of its record of riding roughshod over the power utilities of the States in forcing them to sign on dotted lines in the PPAs with one-sided and questionable terms, NTPC cannot arrogate to itself the authority to perpetuate such questionable and unfair terms in its future PPAs all in the name of continuing uniformity. Nothing is static and change is inevitable. The Discoms pointed out that many States are willing to relinquish their share in NTPC power projects, due to huge penetration of RE capacity, but MoP, GoI, is not allowing it. That is the kind of protection NTPC is enjoying by virtue of legal enforceability of terms in the PPAs concerned and Discoms of States continue to be at the receiving end.
11. Regarding need for incorporating buy-out provision in the subject PPA, the Discoms maintained that whereas, there is no such provision in PPAs related to State GENCO (or) Central Generating Stations, whereunder the tariff is determined under Section-62 of the Electricity Act 2003. The Hon’ble Commission would ensure uniformity in all the provisions of PPAs subsisting with State GENCO Plants /CGS Plants and hence the deviation from Tariff Regulations proposed by the objector may not be possible, the Discoms argued. State Genco plants continue to be property of the State Government and their entire capacity is intended for TS Discoms to meet demand in the State and hence, the need for buy-out clause does not arise. In the case of private projects or CGSs, that is not the position. The so-called uniformity is no virtue and it cannot be a justifiable ground to continue a deficiency or defect or manipulation to recur and continue. The Discoms could not

respond to the reasons in our written submissions in favour of incorporating buy-out provision in the subject PPA, except relying on so-called uniformity.

12. Regarding jurisdiction of CERC to determine tariff of the subject project, the Discoms submitted that “TSDISCOMs will put forth its views before Ld. CERC once the Tariff petition is filed by NTPC in respect of TSTPP-I. b) CERC would examine the Prudence of the Capital Cost of TSTPP-I including IDC & IEDC based on guidelines framed by Ld. APTEL in its judgment in O.P.No.72 of 2010 in delay computation and sharing of IDC between the Parties.” In their presentation before the Hon’ble Commission, TS Discoms informed that the original estimated capital cost of the subject project is Rs.10,997.7 crore and that the NTPC has accorded approval to the revised capital cost of Rs.11,811.26 crore. While zero date of the subject project is 29.1.2016, proposed COD of unit 1 is May, 2022 and of unit II September, 2022. As per the revised capital cost, the cost per MW works out to Rs.7.38 crore. Moreover, there is no certainty that the revised cost will be the final capital cost and that NTPC would not claim any additional capital cost in future for the subject plant. The submissions and responses of the TS Discoms confirm that mostly they have been toying the line of NTPC, that, too, ignoring their own interests and those of their consumers. That was the approach exhibited by the Discoms in the case of TS Genco also. What kind of submissions the Discoms would make before CERC when the petition for tariff determination of the subject project comes up for hearing is anybody’s guess. It is strange that, instead of taking a firm and clear stand in support of the amendments as directed by the Hon’ble Commission in its interim order which are in their interests and those of their consumers, and requesting it to take appropriate decisions in view of refusal of NTPC to agree to the said amendments, the TS Discoms, in their submissions and responses, argued overenthusiastically in support of the stand taken by NTPC.
13. In my submissions dated July 9, 2021, I submitted, inter alia, relating to purchase of 400 MW solar power by TS Discoms from NTPC, that “Since the bidding process was initiated by NTPC in the year 2015 and PSAs were signed by the Discoms in June, 2016 with NTPC, and consents of the Hon’ble Commission to the same have not been given so far, are the TS Discoms getting supply of the proposed 400 MW solar power, and if so, from when? CERC adopted the individual tariff for power projects as discovered through competitive bidding by NTPC with effect from 20.5.2020 and stated that the tariff would be valid till PPA remains valid. Expiry date is defined that it shall mean the date occurring twenty five years from the date of commercial operation of the last unit of the solar power project. However, when the SPDs would declare CODs and when NTPC would start supply of power to the Discoms are not incorporated specifically in the PSAs between NTPC and the Discoms. If the SPDs concerned have not started generation and supply of solar power to NVVN and if the latter has not yet started supply of solar power to the TS Discoms, the tariffs for that power as incorporated then in the PSAs being higher than the tariffs discovered by SECI through competitive biddings later, continuing the entire process for such a long period of more than five years becomes questionable. It also shows that the said solar power has not been required by the

Discoms all these years, though PSAs were signed in the year 2016. Moreover, delay in execution of solar power plants by the SPDs concerned for a long time, gives scope for them to set up the same with much lower capital costs in view of subsequent technological improvements and falling tariffs being discovered through competitive biddings and get the old higher tariffs discovered through competitive bidding and incorporated in the PPAs between NTPC and SPDs, without reducing the same as per the subsequent lower tariffs discovered through competitive biddings. If that is the factual position, it is detrimental to the interests of the Discoms and their consumers and questionable. When solar power tariffs discovered through competitive biddings are reaching as low as Rs.2 per kwh, there is no justification in the Discoms sticking to the proposal to buy solar power @ Rs.4.66 per kwh from NTPC. Starting the process of competitive bidding in the year 2015 and getting tariffs discovered through that process for individual SPDs adopted by CERC with effect from 20.5.2020 provides opportunity to the SPDs to get undue benefit of higher tariffs and impose such burdens on the Discoms as explained above. Obviously, it is a manipulatory arrangement much to the undue benefit of SPDs and other vested interests and detrimental to the interests of the Discoms and their consumers of power.” The Discoms have not been questioning this kind of manipulatory arrangement even before the Hon’ble Commission. Though there is no direct relation to the issue of 400 MW solar power and the subject issue, it reflects on the approach of CERC and underlines need for effective intervention by the TS Discoms to protect their interests and those of their consumers in the subject case when tariff determination process commences before CERC.

14. Regarding notice of NGT issued to NTPC TSTPP-I, as of now, no data is available in the office of the Discom, the latter informed. The information should be available in the office of NTPC. That is the reason why NTPC, as the respondent in the subject petition, should participate in the regulatory process of the Hon’ble Commission, make their submissions, submit their responses and clarify factual position relevant to the subject issue. How the subject project is being implemented, what kind of problems, if any, it has been encountering in execution of the project, when CODs of its units would be declared and when it would submit its petition to CERC for determination of permissible capital cost and tariff of the project, etc., it is for NTPC to make submissions before the Hon’ble Commission.
15. Regarding the balance capacity of 2400 MW of the subject project, the Discoms replied that “this can be considered only after the 1st Phase (2 x 800 MW) is commissioned and coal linkage issues are resolved and further the huge Capacity addition by TSGENCO would also be taken into consideration in order to assess whether there is a need to go for 2nd Phase of NTPC TSTPP-I. As of now, no Agreement has been signed by TSDISCOMs with NTPC in respect of TSTPP Phase-II.” In other words, the TS Discoms are not in a position to assert with any degree of certainty the need for the balance 2400 MW from the subject project. Whether the Discoms require the 1600 MW under phase I of the subject project is also a moot point which needs to be examined realistically. Aware as TS Discoms are of the fact

that many States are willing to relinquish their share in NTPC power projects, due to huge penetration of RE capacity, but MoP, GoI, is not allowing it, it is all the more necessary for the TS Discoms to determine whether power from the subject project is required or not. They cannot go on haphazardly entering into long-term PPAs to purchase power from different sources, without any realistic medium and long-term load forecast, resource plan, procurement plan, etc. That is the reason why we have been repeatedly requesting the Hon'ble Commission to direct the Discoms to submit the same and hold public hearings on the same. It is an inseparable and imperative part of effective regulatory process.

16. In its order for ARR and transmission tariff for the 4<sup>th</sup> control period dated 20.3.2020, the Hon'ble Commission approved transmission contracted capacity for TS Transco to the tune of 21370.12 MW for 2021-22, 21878.73 MW for 2022-23 and 21866.04 MW for 2023-24. It does not include the balance 2400 MW from TSTPP of NTPC. In their presentation during the public hearing on 30.6.2021 in OP Nos.15 to 19 of 2021 relating to the PPAs they signed with TS Genco, TS Discoms projected availability of total installed capacity of 25,760 MW by 2022-23. This also does not include the balance of 2400 MW from TSTPP. Against a contracted capacity of 21878.73 MW, as approved by the Commission in the MYT order for TS Transco, do the Discoms require 25,760 MW, i.e., 3882 MW additionally? What is the basis and justification for requirement of the additional capacity? The said presentation of the Discoms avoided to explain the same.
17. In the above-mentioned presentation dated 30.6.2021, TS Discoms informed that there has been no load relief from 20.11.2014 and that as on 1.6.2021, against a maximum demand of 13,688 MW, the contracted capacity is 16,603 MW. With this capacity, when the Discoms are in a position to meet maximum demand during 2021-22, the transmission contracted capacity approved by the Commission for the same year to the tune of 21,370.12 MW is, obviously, very high. Then, what is the basis for requirement of an additional capacity of 9,157 MW ( $25,760 - 16,603 = 9,157$ ) by 2022-23, i.e., an increase of 55.15% within a span of less than two years? If indiscriminate entering into PPAs on a long-term basis to purchase unwarranted and high-cost power goes on, and if the Hon'ble Commission gives its consents to the same, it may lead to availability of substantial surplus power with attendant adverse consequences. That the kind of adverse situation AP Discoms have been facing, with availability of unwarranted and high-cost surplus power on a large scale, especially RE, with the powers-that-be, the Discoms and the Hon'ble APERC, before the present Chairman and Members took charge, ignoring our submissions made during public hearings on various issues over the years cautioning about the impending disastrous situation as a result of entering into long-term PPAs indiscriminately and giving consents to the same, is a sad and imprudent experience from which proper lessons need to be drawn. Such a disastrous situation has been leading to backing down thousands of MU of power and paying hundreds of crores of Rupees towards fixed charges therefor, and ironically making purchases of power from the market sources and the Discoms making true-up claims for thousands of Crores of Rupees every year even after the GoAP providing a huge subsidy ranging



from Rs.8000 crore to Rs.10,000 crore per annum. Those who were responsible for taking and implementing such questionable and imprudent decisions, imposing avoidable huge burdens on the Discoms and their consumers of power on a long-term basis, in the then GoAP, the Discoms and APERC are not there in the same positions of power and are escaping from their responsibility and accountability for their failures of commission and omission. Let not such an insurmountable disaster befall on Telangana. Once the Hon'ble Commission gives consent to any PPA, it cannot undo the same later. Therefore, a realistic assessment of long-term load forecast, etc., and taking decisions for entering into PPAs and considering them in accordance with the same and reviewing factual position periodically for bringing about necessary modifications is imperative to ensure orderly development of power sector in the State and protect larger consumer interest.

18. I request the Hon'ble Commission to consider the following points, among others:

- a) Direct the TS Discoms to submit medium and long-term load forecast, resource plan, procurement plan, etc., and hold public hearing on the same.
- b) Based on the order to be issued by the Commission on long-term load forecast, etc., please consider need for purchasing power from any power project, including the subject project, and give or reject its consent to PPA of that project and whether relatively cheaper power would be available from other sources.
- c) Ascertain confirmation of allocation of coal from SCCL to the subject project on a firm basis and work out the resultant reduction in variable cost. Also, ascertain whether the balance 15% of capacity of the subject project is allocated to the State of Telangana by GoI.
- d) Direct the TS Discoms and NTPC to submit their petition for determination of permissible capital cost and tariff for the subject project and give a comprehensive and common order on the permissible capital cost, tariff and PPA after holding public hearing on the petition pertaining to determination of permissible capital cost and tariff also.
- e) If the Hon'ble Commission sticks to the view that tariff for the subject plant has to be determined by CERC, keep the subject issue in abeyance and direct the TS Discoms to approach the Hon'ble Commission for consent to PPA of the subject project, only after NTPC gets determination of tariff by CERC for the subject project. If the Hon'ble Commission gives its consent to the subject PPA first, it will not have any opportunity to examine reasonableness or otherwise of the tariff to be determined by CERC and whether the Discoms should be permitted to purchase that power at that rate and consent to PPA be given or not.
- f) If the Hon'ble Commission decides to proceed with the public hearing on the subject issue and give its order, please direct the respondent NTPC also to make

**its submissions, give its responses and clarify factual position of relevant factors, along with the petitioner Discoms.**

- g) If the Hon'ble Commission decides to give consent to the subject PPA, please ascertain whether power from the subject project is required by the Discoms, whether the tariff to be determined by CERC is reasonable, whether power from other sources can be procured at relatively lower tariffs, etc. Also, please incorporate the amendments as directed in the interim order dated 30.7.2016 given by the Commission and direct parties to the PPA to sign and submit the amended PPA accordingly for record purpose, making it clear that the amended PPA would come into force after such submission.**

**19. I request the Hon'ble Commission to permit me to make further submissions, if TS Discoms and NTPC submit any additional information, submissions, responses and clarifications in the subject petition.**

**Thanking you,**

**Yours sincerely,**

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