Southern Power Distribution Company of Telangana Ltd. (TGSPDCL)

Responses to Objections / Suggestions

On

Filings of Revised ARR, FPT & CSS proposals of Retail Supply Business for FY 2026-27

Date: 10.02.2026

INDEX

Sl.No.	Name and other details of the Objector	Page No
10.	**Vijaya Bhasker** Bharatiya Kisan Sangh, F.No.G2, H.No.2-1-174&175, Old Ramalayam Vehi, Rajput Residency, Nallakunta, Hyderabad 500044	91
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14.	**L.Manik Reddy** S/o Linga reddy, H.No:1-39, Village:Nareguda, Post:Vikarabad, Mdl:Navabpet, Pin code:50101	92
15.	**M.Sridhar Reddy,** Bharatiya Kisan Sangh, F.No. G2 H.No. 2-1-174 & 175, Old Ramalayam Veedi, Rajput Residency, Nallakunta, Hyderabad- 500044	93
16.	**Guda Mahender Reddy,** S/o. Malla Reddy R/o Velikatta M/o Kondapak, Siddipet District, Telangana State, Phone No.9396679143	94
17.	**K Jaswanth Reddy,** S/o. Narsi Reddy, H.No.11-1-78/2, Shivaji Nagar, Siddipet, Pincode: 502103, Ph.No.9866602852	95

Sl.No.	Name and other details of the Objector	Page No
18.	**Konatham Lingareddy,** H.No.102, Vinayaka Homes, Vidyanagar Miriyalaguda, Nalgonda District	96
19.	**Vidyasagar,** Thopucherla Village, Vemula Mandal, Nalgonda Dist – 9618277757	97
20.	**Poosala Nagesh,** S/o Narsinga rao, Vil:Gadicharlapally, Mdl:Siddipet, Telangana - 9393006022	98
21.	**Chepuri Chandragoud,** S/o. Yella goud, R/o.Lingapur, M/oThoguta, District:Siddipet, Telangana, Pincode:- 5022788, Phone No.9441764124	99
22.	**Kotla Balakistareddy,** S/o. Narayana Reddy, Saidpally (V), Parigi(M), Vikarabad District, Ph.No.9347546963	100
23.	**G. Chandraih,** District Secretary of Bharatiya Kisan Sangh, H.No.5-15, Nandi Vaddeman village, Bijinapalli -Mandal, Nagarkurnool - district, Pin code No.509215, Ph.No.9492992069	101-102
24.	**M Rajenderreddy,** S/o. Ram Reddy, Chityala (post & Village), Pargi Mandal, Vikarabad District, Ph.No.9704991958	103
25.	**Sama Govardhan Reddy,** H.No.6-114, Kamareddy guda village, Post:Dhannaram, Vikarabad Mandal, Vikarabad District, Ph.No.9989956189	104
26.	**Edhula Anjanreddy,** Village:Chowdarpally, Vangoor – Mandal, Kalvakurthi Division, Nagarkurnool – District, Ph.No. 8790983131	105
27.	**Gadige Gajender,** S/o. Bhimaiya, Nagal Kunta Village, Shabad Mandal, Pincode:509217, Ranga Reddy District	106-107
28.	**N. Venkatareddy** Village:Kerella, Dharoodh Mandal, Vikarabad Dist-501121 – 9849127346	108-109
29.	**Y.N.V.Anjani Kumar, Indian Oil Corporation Limited** Manager(T), Hyderabad Terminal, Mob.No:9896049046	110-112

1. Response to Mr. M Venugopala Rao

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	The projected revenue gap works out to 30% of projected ARR. Though the DISCOMs have not proposed any tariff revision, they have not made submissions as to how they would bridge the projected revenue gap. By implication, it may be considered that for bridging the revenue gap to be determined by the Hon'ble Commission, the state government may agree to provide required subsidy. We welcome such a development.	TGDISCOMs humbly request Government of Telangana to fulfill the requested revenue gap. TGDISCOMs shall abide by the directions of the Hon'ble Commission with regard to revenue gap.
2.	Even if no tariff revision takes place for the FY 2026-27, it is difficult to presume that there would be no additional burdens on the consumers. For the FY 2024-25, NPDCL has shown a net revenue gap of Rs.1086 crore, while SPDCL has shown a net revenue gap of Rs.589.92 crore. The DISCOMs have not prayed for any specific order of the Commission on treating the projected revenue gaps, except submitting that "pass such order as the Hon'ble Commission may deem fit and proper in the facts and circumstances of the case." Though permitted by the Commission, the DISCOMs have not been availing themselves of the opportunity to collect FSA not more than 30 paise per unit every month.	The DISCOMs have not sought any specific direction at this stage regarding recovery of the projected revenue gaps and have left the matter to the regulatory discretion of the Hon'ble Commission. With regard to Fuel Surcharge Adjustment (FSA), while the Commission has permitted recovery up to the prescribed limit, non-levy or deferment of FSA has been a considered decision of the DISCOMs, keeping in view consumer interest.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
3.	For their distribution business for the FY 2024-25, the DISCOMs have filed their petitions, seeking true up of Rs.484 crore by TGNPDCL and Rs.545.18 crore, stating that the amount is “transferred to RSB of 2026-27”. We request the Hon’ble Commission to include in the ARR of the DISCOMs for 2026-27 the amounts claimed under true-up for their distribution business for 2024-25 and net revenue gaps shown for the same FY to the extent it determines as permissible by issuing orders after holding public hearings. True-up claims for distribution business of the DISCOMs, transmission business of TGTRANSCO and various generators of power for the FY 2025-26 also would come up, adding to the true-up claims for retail supply business of the DISCOMS for the same FY to be claimed during 2026-27.	TGSPDCL, in its filings before the Hon’ble Commission, has submitted that the true-up gap pertaining to its Distribution Business for FY 2024-25 may be considered for recovery in the Aggregate Revenue Requirement (ARR) for FY 2026-27 for distribution business only and its is further transferred to Retail Supply Business as per allocation matrix as per MYT Regulations. In line with this request, the true-up amount for FY 2024-25, as filed by the Licensee, has been duly incorporated in the ARR projections for FY 2026-27 for Distribution Business.
4.	We request the Hon’ble Commission to not treat fully or partly the revenue gap it determines for FY 2026-27 in the subject petitions as regulatory asset. There has been no instance of treating revenue gap of the DISCOMs for any FY since regulatory process started in the undivided Andhra Pradesh and after bifurcation of the state in both the Telugu states. The DISCOMs continue to be in financial doldrums, with abnormal dues pending from the government and various categories of consumers and	TGDISCOMs have filed revised ARR for FY 2026-27 as per MYT Regulation 2 of 2023 laid out by Hon’ble commission. TGDISCOMs shall abide by the directions of the Hon’ble Commission with regard to treatment of revenue gap.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	dues to be cleared by them to generators of power and others. Treating any amount as regulatory asset would further intensify the financial difficulties of the DISCOMs and the accumulated burden, with carrying cost, would hang as Damocles' sword on the necks of the consumers.	

2. Response to Mr. Ramisetty Venkata Subba Rao

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	DIRECTIVE 1: Timely Filing and RoE Moderation Regulation: MYT Regulation 2 of 2023, Clause 29.2(f); TGERC RST Order FY 2025-26, para 1.9.5 Mandate: Filing delays beyond 30 November attract automatic 0.5% per month RoE reduction. TGSPDCL's Conduct: • FY 2025-26 ARR filed 29 days late (28.01.2025 vs. 30.11.2024) • FY 2026-27 ARR expected 60–90 days late • No RoE reduction self-applied despite repeated delays Financial Impact: ₹14.5–15 Cr annually; ₹72.5–75 Cr over 5-year period Recommendation: Apply mandatory 0.5% per month RoE reduction; condition approvalon written commitment to meet future deadlines.	TGSPDCL submits that, the filing timelines referred to by the objector coincided with the transition to the revised MYT framework and new formats, requiring extensive data segregation, reconciliation and compliance alignment across multiple heads. The marginal delay in filing was thus procedural and transitional in nature, neither deliberate nor reflective of any service deficiency. Further, the RoE on account of filing timeline is a matter for the Hon'ble Commission's determination under the applicable Regulations. TGSPDCL has placed the full facts on record and has thereafter ensured timely filings in subsequent years in line with the Commission's requirements. Accordingly, the objector's quantified "₹14.5–15 Cr" impact and the prayer for automatic RoE reduction are based on assumptions and are liable to be rejected.
2.	DIRECTIVE 2: Loss-Sharing Mechanism (50:50 Controllable Loss Distribution) Regulation: MYT Regulation 2 of 2023, Clause 14.4; TGERC RST Order FY 2025-26,para 3.23 Mandate: 50% of controllable losses shared between DISCOM and consumers.	TGSPDCL submits that the allegation of "non-implementation" of the loss-sharing mechanism is incorrect and based on self-assumed computations. The sharing of gains/losses arising from deviation of actual losses vis-à-vis approved loss trajectory is in-built in the MYT framework and is applied through the true-up/true-down process strictly as per the MYT Regulations and the Hon'ble Commission's

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	TGSPDCL's Conduct: □ FY 2026-27 filing shows approved loss levels but no evidence of 50:50implementation □ Full pass-through to consumers; no controllable loss segregation □ No DISCOM loss burden reflected in ARR Quantification: □ Controllable losses: ~3.5–4.0% of total losses (~8.08% approved) □ Unshared burden: ₹68.75–77 Cr annually □ 5-year cumulative impact: ₹343.75–385 Cr Recommendation: Disallow 50% of controllable losses (~₹68–77 Cr/year); requirefeeder/DT-wise loss audit.	methodology. Accordingly, there is no concept of upfront or presumptive 'disallowance' in ARR merely because an objector imputes a controllable loss component. Further, segregation of "controllable" and "uncontrollable" loss components is a regulatory determination based on the Commission-approved approach, audited data, and prudence review—not on broad percentage assumptions such as "3.5–4.0%". The objector's proposed disallowance of Rs. 68–77 crore is therefore without regulatory basis and cannot be admitted.
3.	DIRECTIVE 3: Non-Tariff Income (NTI) Realization Regulation: TGERC RST Order FY 2025-26, para 3.15 Mandate: Prepare detailed NTI action plan with quarterly targets; improve realization of under-reported potential. TGSPDCL's Conduct: □ FY 2026-27 NTI projection: ₹320–340 Cr (0.64% of RSB ARR) □ Potential available: 1.2–1.5% □ No structured quarterly targets or action plan submitted Quantification: □ Under-realized NTI: ₹70–90 Cr annually □ 5-year cumulative: ₹350–450 Cr	TGSPDCL submits that the allegation of "under-realized NTI" is unfounded and based on a notional "potential percentage" that has no regulatory standing. Non-Tariff Income (NTI) has been computed strictly in accordance with the MYT Regulations and the applicable tariff formats, considering only those income streams that are attributable to the relevant business (Distribution/Retail Supply) and are recurring and realizable. The objector's approach of imputing NTI at 1.2–1.5% of ARR is arbitrary, unsupported by audited evidence, and contrary to prudence principles. For MYT projections, TGDISCOMs have applied a conservative year-on-year escalation (2%) on the admissible NTI base; however, for

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	Recommendation: Mandate detailed NTI action plan; reduce accepted claims by ₹40–50Cr pending implementation evidence.	true-up and subsequent determinations, NTI is claimed on the basis of audited actuals separately for Distribution and Retail Supply businesses. Accordingly, there is no understatement or suppression of NTI—only regulation-consistent classification and realistic projection. Further, the request to "reduce ₹40–50 Cr" upfront is misconceived. NTI is an income offset to ARR and is to be admitted based on audited accounts and verifiable heads; it cannot be reduced or enhanced on assumptions. TGSPDCL has already furnished detailed break-up while truing-up of Distribution Business as directed by the Hon'ble Commission, but the objector's proposed presumptive disallowance is liable to be rejected.
4.	DIRECTIVE 4: Power Purchase Cost & Merit-Order Dispatch Regulation: MYT Regulation 2 of 2023; TGERC RST Order FY 2025-26, paras 3.8.63–3.8.64 Mandate: Base variable cost projections on 3-month moving average of actuals; apply merit-order dispatch discipline. TGSPDCL's Conduct: □ FY 2026-27: Claims 5% variable cost escalation without merit-order analysis □ Does NOT integrate November 2024–January 2025 actual variable costs as directed	TGDISCOMs submit that we have followed Merit Order Dispatch at hourly block level to estimate the dispatch from various thermal generating stations based on their Variable cost to optimize the cost of power procurement. In, addition TGDISCOMs have also considered power procurement from Short-term sources at times when the Market prices are lesser than the Variable cost of certain generating stations. Further, TGDISCOMs have projected Variable cost for FY 2026-27 lesser than that incurred in FY 2024-25 considering the impact of Coal cost reduction. For CGS stations and IPPs (SEIL), TGDISCOMs have considered 5% escalation in the Variable Cost incurred in H1 of FY 2025-26 to account for the expected raise in the expenses.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	□ No documented merit-order analysis in filing Quantification: □ Conservative disallowance estimate: ₹400–500 Cr annually □ 5-year cumulative: ₹2,000–2,500 Cr Recommendation: Disallow arbitrary 5% escalation; rebase on recent actuals with maximum 1% escalation; reduce variable cost by ₹400–500 Cr.	
5.	DIRECTIVE 5: Asset Completion Certificates and Capitalization Validation Regulation: TGERC RST Order FY 2025-26, paras 3.15–3.16 Mandate: Provide COD, PCC, and FCC for all capitalized assets; depreciation only uponvalid certification. TGSPDCL's Conduct: □ ₹175.21 Cr in assets capitalized without completion documentation □ No COD/PCC/FCC evidence submitted for major additions □ Depreciation claimed on unverified assets □ No scheme-wise project completion status provided Critical Violation: Depreciation on Capital Work in Progress (CWIP) violates MYTRegulation 7, which explicitly prohibits depreciation on incomplete assets. Retail Supply	TGSPDCL submit that compliance with directives issued in the MYT and Tariff Orders is an ongoing process, and both DISCOMs are adhering to the requirements stipulated under the applicable Regulations, including those relating to investment approval, capitalization procedures, and submission of PCC/FCC certificates. Wherever capital works are completed, the PCC and FCC are being issued by the competent authorities and submitted to the Hon'ble Commission in line with the timelines prescribed. With respect to TGSPDCL, the utility has been complying with the directives in accordance with the Hon'ble Commission's instructions, and any pending submissions are being furnished in the formats and frequently communicated by the Commission. TGSPDCL reiterate that all capitalization entries admitted into ARR will be strictly subject to prudence check, verification of PCC/FCC, and Commission approval, ensuring that only assets duly completed, recorded, and put to use are reflected in OCFA. Therefore, the concern

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	Business depreciation increased 76.2% from ₹65.18 Cr to ₹114.87 Cr with no assetcompletion documentation. Quantification: □ Capitalized assets pending certification: ₹175.21 Cr □ Annual depreciation on unverified assets: ₹5–7 Cr (formal claim) + ₹49.69 Cr (CWIPviolation) = ₹54.69–56.69 Cr □ 5-year excess depreciation impact: ₹273.45–283.45 Cr Recommendation: Suspend depreciation on ₹175.21 Cr pending COD/PCC/FCCsubmission within 30 days; de-capitalize if not provided; disallow CWIP depreciationretroactively.	regarding non-compliance or lack of oversight does not arise.
6.	DIRECTIVE 6: Geographic Information System (GIS) Operationalization Regulation: TGERC RST Order FY 2025-26, para 3.12 Mandate: Prioritize GIS mapping for feeder-wise loss monitoring, theft detection,preventive maintenance. TGSPDCL's Conduct: □ Only partial coverage (~30–40% of network in main towns) □ Estimated ₹55–92 Cr annually from cable/DT damage due to lack of GIS coordination □ No timeline for 100% implementation Quantification: □ Annual cable/DT damage cost: ₹55–92 Cr	TGSPDCL has developed an app and GIS mapping of majority of distribution transformers, feeders, and consumers are done. Further, certain assets are being added to the network and certain are retired and is a continuous process. The same are being updated regularly.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	□ 5-year cumulative: ₹275–460 Cr Recommendation: Direct 100% GIS mapping completion within 24 months; condition RoE approval on quarterly reporting; disallow ₹30–40 Cr/year from distribution cost untiloperationalized.	
7.	SECTION 2: FUEL COST ADJUSTMENT (FCA) MECHANISM – SYSTEMATICNON-COMPLIANCE TGSPDCL's Systematic Failure No Monthly FCA Levy: TGSPDCL has NOT computed, published, or levied monthly FCA as required. Instead, it seeks to recover accumulated fuel/power purchase variationsthrough True-up petitions filed years after year-end. No Contemporaneous Publication: FCA amounts are NOT published within 45 days ofmonth-end. Delay renders historical FCA claims inadmissible per Clause 13.3(d). Ex-Post True-Up Substitution: □ FY 2022-23 variations sought via True-up filed 2025 (3 years after year-end) □ FY 2023-24 variations sought via True-up filed 2025 (2 years after year-end) □ FY 2024-25 variations sought in FY 2025-26 ARR without real-time FCA filings Commission's Earlier Warning: TGERC RST Order FY 2025-26, paras 3.3.8–3.3.11	TGDISCOMs are diligently adhering to the current MYT regulations 1 of 2023 in calculating FCA and will continue do so. The TGDISCOMs have addressed letters to the GoTG for approval for collection of FCA amount regularly every month as per the provisions in the MYT Regulation. TGDISCOMs have clearly stated in their submissions that no Power Purchase true-up is being claimed for FY 2023-24 and FY 2024-25, and have requested the Hon'ble Commission to pass necessary orders accordingly. This clearly demonstrates the TGDISCOM's adherence to the regulatory framework and compliance with the directions of the Hon'ble Commission. It is further submitted that as per regulations, Power Purchase true-up for FY 2022-23 is allowed since disallowance based on FCA levying is not applicable for FY 2022-23. If the Hon'ble commission updates/modifies to the treatment of FCA, DISCOMs shall abide by the directions of the Hon'ble Commission.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	explicitly noted concerns and rejected lump-sum FCA filings for non-compliance with stipulated timelines. Blocked FCA Recovery Impact: □ FY 2022-23: ₹150–200 Cr unrecovered □ FY 2023-24: ₹120–180 Cr unrecovered □ FY 2024-25: ₹100–150 Cr unrecovered □ Total Blocked FCA: ₹370–530 Crore now improperly attempted to be loaded into FY 2026-27 ARR Recommendation: TGERC must: 1. Suspend acceptance of all lump-sum fuel/variable cost adjustments claimed outside FCA mechanism 2. Direct immediate operationalization of monthly FCA levy effective January 2026 3. Disallow ₹370–530 Crore cumulative FCA backlog from FY 2026-27 ARR 4. Require TGSPDCL to establish automated monthly FCA computation and publicationsystem	
8.	SECTION 3: CAPEX ANALYSIS (LAST 3 FISCAL YEARS) AND 3RD DISCOM IMPACT 1. Capex Proposals Lack Cost-Benefit Analysis: 2. Chronic Under execution	**1) Capex proposals lack Cost–Benefit Analysis (CBA)** TGSPDCL submits that the capex proposals are need-based system strengthening schemes formulated through network planning, load-growth assessment, reliability constraints, and statutory requirements.

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	3. Asset Completion Gaps 4. It is observed that a significant number of assets created by the DISCOM—including substations (SS), power transformers (PTRs), lines, and distribution transformers(DTs)—are operating at very low utilisation levels, in many cases below 30% of their rated capacity. The Hon'ble Commission may therefore direct the DISCOM to submit comprehensive asset-wise and circle-wise details of loading levels of all substations, PTRs, lines, and DTs. The same may be subjected to prudent scrutiny. 5. 3rd DISCOM Asset Transfer Impact (Effective 1 April 2026):Submitting ARR that ignores the 3rd DISCOM formation is materially deficient andcannot be approved as-is. 6. Future Capex Sustainability: Original 5-year capex plan: ~₹7,500–8,000 Cr. Currentexecution rate: 80% → 6,000–6,400 Cr likely. Asset base reduction post-3rd DISCOM: -25% → need for capex reduced proportionately. Proposed capex appears inflated andexecution-infeasible	The Hon'ble Commission's investment approval process already provides the mechanism for scheme-wise scrutiny, including technical justification, cost reasonability, and phasing. The objector's sweeping statement that "no CBA exists" is generic and unsubstantiated and ignores that capex is evaluated scheme-wise and admitted only after prudence check. **2) Chronic under-execution (~80%)** Capex execution is influenced by RoW constraints, statutory clearances, tender timelines, site readiness, monsoons, supply-chain constraints and vendor capacity, especially for urban and high-density areas. Variations in annual execution do not indicate imprudence; rather, they reflect practical implementation realities. Importantly, only actual capitalization (not mere approval/projection) is considered for ARR treatment, and any under-execution does not get loaded on consumers. **3) Asset completion gaps / capitalization issues** TGSPDCL reiterates that capitalization is undertaken based on completion and put-to-use, supported by certification and records. Wherever the Hon'ble Commission requires additional documentation (scheme-wise status, PCC/FCC, energisation details), TGSPDCL has furnished the same in the manner and timelines directed. The objector's insinuation that capitalization is routinely done without completion is incorrect and ignores the Commission's established prudence process. 4) **Many assets operate below 30% utilisation** The objection reflects a misunderstanding of distribution planning. Distribution assets are designed with planning margins to meet peak

S.No.	Summary of Objections / Suggestions	Response of the Licensee
		demand, N-1 contingency, load growth, reliability standards, voltage profile requirements, and seasonal peaks. Temporary or location-specific under utilisation may occur due to demand ramp-up lags, new load additions, or phased commissioning, and cannot be construed as wasteful investment. However, the allegation that low utilisation automatically implies imprudence is misplaced. **5) ARR ignores 3rd DISCOM formation** It may be noted that, Govt of Telangana had issued a GO pertaining to formation of Third Discom on 17th Dec 2025. To comply with the requirement of filing ARR within the stipulated time as outlined by Hon'ble TGERC, TGDISCOMs had undertaken earnest efforts and submitted the filing by 29th Nov 25.The filing was made all the information available to the licensee at the time of filing. Subsequent to the issue of GO, the licensees have started taking the next steps with regard to 3rd DISCOM formation such as administrative step of company creation. Once the company creation is done, an application for formation of 3rd discom will be filed before the Hon'ble TGERC. It may be noted that a due process as outlined in the Electricity Act/Regulatory provisions needs to be followed before 3rd discom comes into operation. Hence, the DISCOMs submit that there was no deficiency in the filing of ARR. **6) Future capex inflated and infeasible**

S.No.	Summary of Objections / Suggestions	Response of the Licensee
		Capex cannot be reduced mechanically in proportion to asset transfer assumptions. Network investment needs depend on demand growth, reliability constraints, urbanisation, equipment ageing, safety compliance and redundancy requirements, not merely on book value of assets. Further, execution feasibility is addressed through phasing, scheme prioritization and Commission oversight; and ARR impact arises only upon actual capitalization. Hence, the claim that capex is “inflated” or “execution-infeasible” is speculative and without technical basis.
9.	SECTION 4: CAPABILITY TO SPEND LARGE CAPEX Critical Constraints 1. Financial Capacity 2. Execution Capacity 3. Asset Utilization & Management Conclusion: TGSPDCL cannot credibly spend ₹7,500+ Cr capex over next 5 years while maintaining financial sustainability, achieving regulatory targets, and executing currentapprovals.	The proposed capital expenditure of Rs. 7,508 crore for FY 2026-27 includes both the capex already approved by the Hon’ble Commission for the FY 2026-27 of 5th Control Period and the additional capex requirements that have emerged due to recent system conditions, network constraints, and reliability considerations. The additional capex primarily pertains to conversion of OH line to Underground cabling works, SCADA expansion and automation, New substations and capacity augmentation, required to meet summer peak loads and to address over loading of existing transformers and feeders. These works were not envisaged at the time of filing the MYT Petition due to evolving demand patterns, accelerated urbanisation, and emergent reliability issues. The new substations are planned for upcoming summers as we are expecting high unprecedented peak demand and stress on the distribution network, necessitating immediate system reinforcement to maintain safe voltage levels and prevent overloads. Accordingly, the additional capex being sought is directly linked to

S.No.	Summary of Objections / Suggestions	Response of the Licensee
		system reliability and safety. TGSPDCL therefore requests the Hon'ble Commission to approve the additional capex and the ARR arrived for FY 2026-27 to ensure reliable and uninterrupted supply to consumers during the forthcoming high-demand periods.
10.	SECTION 5: ALTERNATIVE METHODS – DEMAND-SIDE MANAGEMENTPROGRAM DSM Measures with Unit Economics Measure 1: Transformer Replacement Program □ Target: Replace 100 kVA DTs with high failure rates □ Unit Cost: ₹1.35 Lakh per 5-Star rated DT □ Annual Benefit per DT: ₹94,700 (avoided repairs + reduced losses) □ Payback Period: 1.4–2.5 years □ Pilot Scope (5,000 units): ₹675 Cr capex; ₹473.5 Cr annual benefit Measure 2: Agricultural Pump Energy Audits & Replacement □ Target: High-efficiency pump replacement □ Unit Cost: ₹70,000 per pump (5-Star rated) □ Annual Benefit: ₹14,175–22,000 per pump (20–25% energy reduction) □ Payback Period: 3–5 years □ Full Program (200,000 pumps): ₹1,000–1,200 Cr; ₹800–1,200 Cr annual benefit Measure 3: Capacitor Installation at Distribution	Measure-1: The cost–benefit analysis presented in the objection appears to be based on overstated assumptions regarding repair expenditure and loss reduction. At present, DISCOMs are not incurring annual costs of ₹94,700 per 100 kVA distribution transformer on repairs and accounted losses combined. The actual expenditure is significantly lower, and therefore the projected annual benefit figure does not accurately reflect ground realities. Consequently, the payback period and benefit calculations derived from these inflated assumptions do not hold good. While DISCOM acknowledges the importance of transformer reliability and efficiency, the financial justification provided in the objection is not aligned with the current operational and expenditure data. Measure-2: The proposed measure is not feasible under the current regulations, as agricultural pump sets are not assets owned or maintained by DISCOMs. However solarization of grid connected Agriculture pump sets will be taken up as part of KUSUM scheme component-C to reduce grid dependency. Additionally, the projected energy savings of 20–25% appear overstated

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	Transformer Level (APFC Panels) Technical Background: Power factor in agricultural distribution networks typically operates at 0.70–0.75, significantly below optimal 0.95. This creates substantial technical and commercial losses. Intervention: Installation of Automatic Power Factor Correction (APFC) panels at distribution transformer level Measure 4: Scrap-and-Replace Program for Life-Expired Distribution Transformers Current Problem: TGSPDCL spends ₹13.5 crore annually repairing 5,000 failed distribution transformers. This repair-and-replace cycle is economically unviable—repairs extend asset life only 6 months while replacement provides 5-year warranty and superior performance. Proposed Solution: Systematically scrap transformers >15 years old with >25% no-load current; replace with amorphous-core transformers achieving 70% lower no-load losses.	when compared to field-level data and practical operating conditions. Therefore, the cost–benefit analysis presented in the objection does not accurately reflect the realities of agricultural supply and billing practices. Measure-3: The assumption of a 0.70 power factor used in the objection is not consistent with actual field conditions observed in TGDISCOM networks. DISCOMs regularly carry out detailed studies to assess capacitor requirements, and based on these analyses, installation of power factor correction devices at the distribution transformer (DTR) level has not been found to be economically viable. Presently, capacitor banks are strategically installed at 33 kV substations and at Transco substations. This approach effectively improves the overall system power factor and reduces technical losses at a network-wide level, rather than at individual DTRs Measure- 4: The assumption in the objection that repaired distribution transformers have an asset life of only six months is not accurate. In practice, the asset life after repair for TGDISCOMs is significantly higher, which makes repairs economically viable compared to outright replacement. Further, DISCOMs follow a structured process of scrutiny at the transformer level to determine whether a unit should be repaired or scrapped. This ensures that only transformers with irreparable damage are replaced, while those that can be restored to reliable service are repaired. This approach optimizes costs, extends asset life, and maintains system reliability without incurring unnecessary capital

S.No.	Summary of Objections / Suggestions	Response of the Licensee
		expenditure.
11.	SECTION 6: SYSTEMIC CORRUPTION AND LEADERSHIP FAILURES 6.1 Pervasive Corruption at Multiple Levels 6.2 Root Cause: Patronage-Based Leadership 6.3 Neglect of Technical Reform 6.4 Regulatory Directives on Corruption & Reform	Isolated incidents reported in the media do not reflect the overall performance of TGDISCOMs. TGDISCOMs have robust internal vigilance mechanisms and take disciplinary action against erring staff. We request the Commission to consider performance metrics and audited compliance reports rather than anecdotal reports. The details of the action taken against erring staff for FY 2024-25 and FY 2025-26 arealready provided to the Hon'ble Commission
12.	Section 7: 3rdDiscom Formation: Impact on ARR Commission should reject current ARR filing and require TGSPDCLto submit revised FY 2026-27 ARR reflecting post-3rd DISCOM asset base and consumer base, with complete bifurcation schedules attested by auditors.	It may be noted that, Govt of Telangana had issued a GO pertaining to formation of Third Discom on 17th Dec 2025. To comply with the requirement of filing ARR within the stipulated time as outlined by Hon'ble TGERC, TGDISCOMs had undertaken earnest efforts and submitted the filing by 29th Nov 25. The filing was made all the information available to the licensee at the time of filing. Subsequent to the issue of GO, the licensees have started taking the next steps with regard to 3rd DISCOM formation such as administrative step of company creation. Once the company creation is done, an application for formation of 3rd discom will be filed before the Hon'ble TGERC. It may be noted that a due process as outlined in the Electricity Act/ Regulatory provisions needs to be followed before 3rd discom comes

S.No.	Summary of Objections / Suggestions	Response of the Licensee
		into operation. Hence, the DISCOMs submit that there was no deficiency in the filing of ARR.
13.	SECTION 8: ASSET VERIFICATION AND PCC/FCC REQUIREMENTS Current Framework Gap: Government Order on 3rd DISCOM formation (G.O.Ms. No. 44, Dated 17.12.2025)directs preparation of detailed asset registers for agricultural DTRs and downstreamnetworks, including gross fixed assets, age, and accumulated depreciation. However,TGSPDCL lacks published construction standards suitable for asset verification andongoing operations. Recommendations for PCC/FCC Verification Instead of accepting bare PCC/FCC certificates submitted by DISCOM, Commission can: 1. Cross-Verify Sample Assets: Independent third-party/CEA-empanelled inspection of 20–25% of major capitalized assets 2. Correlate Certifications with Reality: Match COD/PCC/FCC dates with GIS/asset register and actual energisationrecords 3. Allow Depreciation Only Post-Verification: Defer	TGSPDCL submit that compliance with directives issued in the MYT and Tariff Orders is an ongoing process, and both DISCOMs are adhering to the requirements stipulated under the applicable Regulations, including those relating to investment approval, capitalisation procedures, and submission of PCC/FCC certificates. Wherever capital works are completed, the PCC and FCC are being issued by the competent authorities and submitted to the Hon'ble Commission in line with the timelines prescribed. With respect to TGSPDCL, the utility has been complying with the directives in accordance with the Hon'ble Commission's instructions, and any pending submissions are being furnished in the formats and frequently communicated by the Commission. TGSPDCL reiterate that all capitalization entries admitted into ARR will be strictly subject to prudence check, verification of PCC/FCC, and Commission approval, ensuring that only assets duly completed, recorded, and put to use are reflected in OCFA. Therefore, the concern regarding non-compliance or lack of oversight does not arise.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	depreciation and RoE claims until independent verification completed 4. Establish Asset Register Audit: Annual third-party audit of asset completion status and depreciation accuracy Aged Asset Replacement Analysis Critical Finding: TGSPDCL collects depreciation from consumers (FY 2024-25 actual: ₹809.32 Cr; FY 2026-27 proposed: ₹1,034 Cr) ostensibly for asset replacement after useful life. However, there is disconnect: □ Which aged assets have been replaced? List to be provided □ Are replacement programs adequately funded and executed? Asset replacementschedule required □ When assets complete useful life and are decapitalized, where is the consumerbenefit? Decapitalization income to be explicitly shown and credited to consumers Recommendation: Commission should require TGSPDCL to: 1. Submit asset register showing all assets >3 years old with remaining useful life 2. Prepare comprehensive asset replacement program with year-wise schedule and costs 3. Provide decapitalization schedule showing annual	

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	decapitalization expected andconsumer benefit 4. Link depreciation recovery to actual replacement (if replacement not executed, reducenext year's depreciation allowance proportionately) 5. Introduce "Renewal Fund" concept where depreciation collected is exclusively usedfor replacement capex	
14.	SECTION 9: CONSTRUCTION STANDARDS AND CONTRACTOR QUALITY Current Deficiency: TGSPDCL currently lacks published, written construction standards suitable for distribution network works. This absence creates risks. Capex Execution Risk Given the scale of proposed works (smart metering, underground cabling, network augmentation), quality failures would create large future losses. The GO on 3rd DISCOM formation contemplates installation of ~2.92 lakh DTR-side smart meters at ₹1,306 Cr statewide cost. Poor-quality metering infrastructure would compromise revenue collection and operational control. Recommendations for Contractor Selection and Standards Major cable-laying and underground works should be awarded ONLY to technically qualified and proven contractors (including experienced MNCs that have already executed similar urban underground schemes)	TGDISCOMs clearly adhere to Indian Standards (IS) and CEA Regulations in all construction activities, whether for new works or modifications to existing networks. These standards comprehensively cover critical aspects such as: • Construction of substations, switchyards and electric lines • Line-to-line and line-to-ground clearances for all voltage levels • Minimum separation distances from telecom and other utility cables • Insulation requirements for cables and associated testing protocols • Civil and electrical specifications for underground cable laying and jointing By mandating compliance with IS standards and CEA Regulations, DISCOM ensures that construction practices are uniform, reliable, and safe. In addition, quality checks are carried out at multiple stages to minimize risks of substandard work and premature failures. TGDISCOMs ensure strict quality control in procurement by carrying out vendor checks before placing any purchase orders. All supplied materials are verified against technical specifications and standards. If

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	using competitive bidding, with: 1. Mandatory Use of Standard-Specification Cables/Joints: Type-tested to BIS/IEC 2. Defect-Liability and Performance Guarantees: Covering at least 5–7 years 3. Pre-Approved Construction Method Statements: Independent quality audits mandatory 4. Local Firm Alternative: If local contractors are preferred, require: □ Demonstrated track record on similar projects (₹10+ Cr projects) □ Subcontracting arrangement with experienced MNC for cable-laying and joint works □ Performance bonds and defect-liability guarantees equivalent to MNC standards Commission-Directed Construction Standards Recommendation: Commission should direct TGSPDCL to prepare and notify: 1. Unified Distribution Construction Standards aligned with CEA regulations covering: □ Overhead lines (conductor type, span length, earthing, safety clearances) □ Underground cables (cable type, duct standards, joint specifications, burial depth) □ Earthing systems (electrode type, resistance norms,	any discrepancy or non-compliance is identified, the concerned vendor is subject to corrective action, including blacklisting, to prevent the use of low-quality products in the network. This process ensures that only approved, quality-assured materials are deployed in construction and maintenance activities

<table>
<tr><th>S.No.</th><th>Summary of Objections / Suggestions</th><th>Response of the Licensee</th></tr>
<tr><td></td><td>maintenance protocols)
□ Metering installations (meter box standards, sealing practices, data security)
2. Link capex approval to strict adherence to these standards
3. Field quality audits mandatory before asset capitalization
4. Disallow capex where works are not executed as per approved standards</td><td></td></tr>
<tr><td>15.</td><td>SECTION 10: QUANTIFIED CONSUMER IMPACT SUMMARY
Annual Consumer Burden from Compliance Failures
<table>
<tr><th>Issue</th><th>Annual Impact (₹ Cr)</th><th>5-Year Impact (₹ Cr)</th></tr>
<tr><td>RoE Non-Modulation</td><td>14.5–15</td><td>72.5–75</td></tr>
<tr><td>Loss-Sharing Not Applied</td><td>68.75–77</td><td>343.75–385</td></tr>
<tr><td>NTI Under-Realization</td><td>70–90</td><td>350–450</td></tr>
<tr><td>Variable Cost Escalation</td><td>400–500</td><td>2,000–2,500</td></tr>
<tr><td>Depreciation on Unverified Assets</td><td>54.69–56.69</td><td>273.45–283.45</td></tr>
<tr><td>GIS Mapping Not Implemented</td><td>55–92</td><td>275–460</td></tr>
<tr><td>FCA Not Levied (Loading Into ARR)</td><td>74–106</td><td>370–530</td></tr>
<tr><td>**TOTAL ANNUAL BURDEN**</td><td>**₹687.75–887 Cr**</td><td>**₹3,436.25–4,435 Cr**</td></tr>
</table>
Per-Unit Tariff Impact
□ Annual ARR TGSPDCL: ₹50,242 Crore
□ Annual Energy Sales: ~63.4 MU</td><td>TGDISCOMs hereby submit that we have explained the justification and considerations of estimation for all the said line items in the respective sections.

In addition, we humbly submit that the Actual Energy sales projected for TGSPDCL is 63,753 MUs and the excess tariff mentioned by the petitioner seems to be factually incorrect.</td></tr>
</table>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	□ Excess tariff from compliance failures: ₹687.75–887 Cr ÷ 63.4 MU = ₹10.85–14 paise per kWh Consumer Tariff Impact Examples (If Compliance Directives Implemented) □ Domestic consumer (200 units/month): ₹217–280 annual savings □ Small commercial (500 units/month): ₹542–700 annual savings □ Industrial consumer (5,000 units/month): ₹5,425–7,000 annual savings	
16.	SECTION 11: REMEDIAL DIRECTIVES AND RECOMMENDATIONS Recommended Commission Actions (in order of urgency): Immediate Actions (January–March 2026) 1. Defer FY 2026-27 ARR/Tariff Approval pending resolution of compliance issues and 3rd DISCOM restructuring 2. Direct TGSPDCL to Respond In-Writing on each compliance failure with action plan 3. Initiate Regulatory Enquiry into systemic corruption, patronage appointments, and technical mismanagement 4. Require Revised ARR Filing accounting for 3rd DISCOM formation Short-Term Conditions (FY 2026-27)	For reasons clearly elucidated in Section 7, the DISCOMs have started taking the necessary steps towards formation of 3rd discom. The DISCOM is presently fulfilling the administrative and regulatory requirements such as company formation, filing of licensee application etc. TGDISCOMs have robust internal vigilance mechanisms and take disciplinary action against erring staff. It may noted that the TGDISOMs have dedicated Energy Audit/DSM cell which looks at identifying opportunities for energy savings and implementing necessary measures. Hon'ble TGERC has notified the Demand Side Management(DSM) Regulation 2020 on 24thNov 2020. The licensees are complying to the regulation for all the activities pertaining to DSM. The DSM regulation 2020 clearly mentions the detailed methodology

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	5. Operationalize Monthly FCA Mechanism: Effective February 2026 6. Mandate DSM Pilot Program: ₹1,000–1,200 Cr capex; ₹950–1,150 Cr annual benefit target 7. Suspend Depreciation: On ₹175.21 Cr unverified assets (30-day deadline for certification) 8. Apply RoE Moderation: 0.5% per month for filing delays 9. Implement Loss-Sharing: Disallow 50% of controllable losses (~₹68–77 Cr/year) Medium-Term (FY 2027-29) 10. Complete GIS Mapping: 100% coverage within 24 months 11. Scale DSM Programs: Phase 2 expansion; target ₹2,243–2,878 Cr annual benefits byFY 2029-30 12. Establish Construction Standards: Unified standards with mandatory complianceframework 13. Tariff Moderation: Rather than 8–12% annual increases, cap at 2–3% with DSMsavings pass-through Long-Term Structural Reform (Control Period onwards) 14. Institutional Restructuring: Merit-based leadership recruitment, Telangana-prioritizedappointments, separation of functions 15. Regulatory Conditions: AT&C losses ≤15% by FY 2028-29; zero tolerance forcorruption; sustained DSM delivery	pertaining to identifying the DSM opportunities, evaluation of benefits and preparation of detailed project report and monitoring of benefits. The DISCOM is complying with the DSM regulation 2020. Hon'ble TGERC has notified, the MYT Regulation 2 of 2023, These regulations outline the penalty structure applicable in case of delay in filings by the DISCOM. However, it may be noted that the DISCOMs have filed the ARR proposals within the stipulated time. TGDISCOMs clearly adhere to Indian Standards (IS) in all construction activities, whether for new works or modifications to existing networks. These standards comprehensively cover critical aspects such as: • Construction of substations, switchyards and electric lines • Line-to-line and line-to-ground clearances for all voltage levels • Minimum separation distances from telecom and other utility cables • Insulation requirements for cables and associated testing protocols • Civil and electrical specifications for underground cable laying and jointing By mandating compliance with IS standards, DISCOM ensures that construction practices are uniform, reliable, and safe. In addition, quality checks are carried out at multiple stages to minimize risks of substandard work and premature failures. There are different departments in TGDISOMs clearly looking at different functions/ services. These departments are headed by experienced personnel who have demonstrated capabilities and

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	16. Alternative Financing: Leverage energy efficiency and carbon credit revenues toreduce tariff burden.	expertise in delivering the required outcomes.
17.	SECTION 12: COMPLIANCE CERTIFICATION REQUIREMENTS Mandatory Filings by TGSPDCL Prior to FY 2026-27 Tariff Approval **Within 30 Days** • Asset Completion Certificates (COD/PCC/FCC) for ₹175.21 Crore capitalized assets • Detailed feeder/DT-wise loss audit identifying controllable vs. non-controllablelosses • NTI Action Plan with quarterly realization targets • Written response to each compliance issue identified in this submission • Cost-Benefit Analysis for proposed capex schemes comparing with DSM alternatives **Within 60 Days** • GIS Implementation Roadmap with 24-month completion timeline • Commitment letter for monthly FCA filing henceforth (copies to be published within45 days) • Variable cost justification based on November 2024–January 2025 actuals with meritorderdispatch plan	Asset Completion Certificates (COD/PCC/FCC): PCC and FCC for all capital works are submitted by DISCOMs to the Commission within the stipulated timelines. Feeder/DT-wise Loss Audit: The Energy Audit Wing regularly analyzes feeders to identify those with high technical and commercial losses. To improve performance, DISCOM staff conduct field-level inspections to detect theft and unauthorized connections. NTI Action Plan: Action plans are prepared and implemented to address non-technical issues, with periodic monitoring to ensure realization of targets. Written Response to Compliance Issues: DISCOMs provide written responses to each compliance issue raised, ensuring transparency and accountability. Cost-Benefit Analysis for Capex Schemes: DISCOMs evaluate proposed capital expenditure schemes against demand-side management (DSM) alternatives to ensure economic viability GIS Implementation Roadmap: GIS mapping of all distribution transformers, feeders, and consumers is currently under progress Monthly FCA Filing: TGDISCOMs are addressing letters to the Government of Telangana (GoTG) for FCA recovery every month, and filings will continue henceforth. Revised ARR Petition: The revised ARR petition, accounting for the

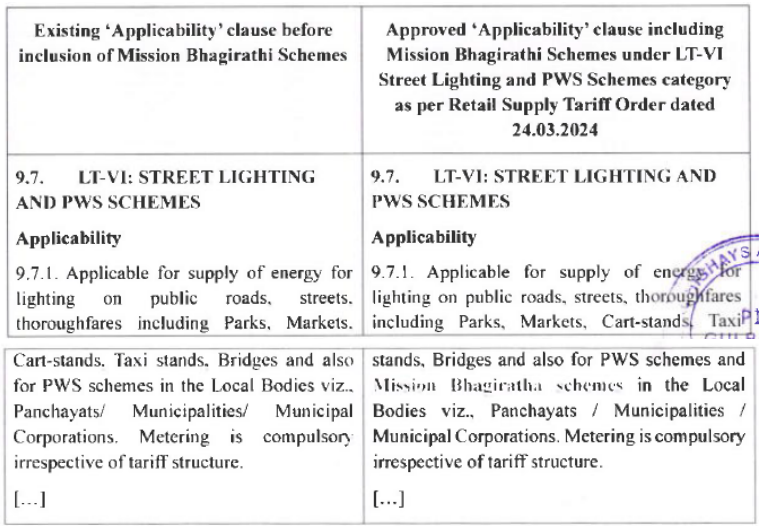
S.No.	Summary of Objections / Suggestions	Response of the Licensee
	• Revised ARR petition accounting for 3rd DISCOM formation and asset transfer **Ongoing (Quarterly)** • Attestation of controllable loss reduction progress • NTI realization against approved targets • GIS mapping coverage percentage • FCA computation and publication records • DSM program implementation status with measured savings	formation of the 3rd DISCOM and asset transfer, will be filed once the license is issued to the new DISCOM.
18.	CONCLUSION TGSPDCL cannot credibly claim further tariff increases while: • Failing systematic compliance with regulatory directives (₹415–592 Cr annual impact) • Operating under entrenched corruption and patronage-driven leadership • Proposing ₹7,500+ Crore capex without Cost-Benefit Analysis or executionfeasibility • Achieving only 80% capex execution with inflated future proposals • Ignoring low-cost, high-return technical interventions (DSM potential: ₹2,243–2,878Cr annual savings) • Submitting ARR that does not account for 3rd DISCOM formation. The only sustainable path is conditional ARR approval tied to demonstrable reforms,DSM implementation, loss reduction, and corruption investigation with	The responses to the said objections has been addressed by TGSPDCL in previous sections & we would like to reiterate the fact that the ARR and gap projections has been done with prudence reflecting the actual conditions. In addition, TGDISCOMs have robust practices to avoid corruption and has directed efforts on the other critical areas highlighted. In view of the above, the TGSPDCL pray the Hon'ble commission to consider the ARR filings of FY2026-27 made in accordance with MYT Regulation 2 of 2023 and approval be accorded.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	credibleoutcomes. Consumer protection and utility sustainability require regulatory discipline. TheCommission's approval should be withheld until evidence-based reform is credible.	

3. Response to National Highways Authority of India

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	Streetlights on National Highway fall under LT-VI Category 35. In terms of the Retail Tariff Order dated 29.0.1.2025 and 28.10.2024. LT-VI category includes supply of energy for lighting on public roads. streets. Thoroughfares including Parks. Markets, Cart-stands. Taxi stands. Bridges and also for PWS schemes in the Local Bodies viz., Panchayats/Municipalities/Municipal Corporations. Accordingly. it is evident that LT-VI Street Light category is applicable, among others, fur lighting in public streets/ thorough fares which are open to the general public. 36. Further, LT-VI Street Light category is a distinct category specifically designed to cover street lighting for public use. The usage of the word "including" makes it evident that LT-VI Street light category is an inclusive category and would cover any street lighting which serves a public utility function. Accordingly, street lighting on National Highways ought to be categorized under the LT-VI Street Light category, as it is intended for public safety.	➢ As per the existing Retail Supply Tariff Order, only those street lighting services operated by Local Bodies viz.,Panchayats/Municipalities/Municipal Corporations are categorized under LT VI (A) Street Lights. ➢ In view of the above, as the street lights maintained by NHAI do not fall in the purview of local body and in any other LT category, the same are to be categorized under LT II Non Domestic/Commercial category as per the terms and conditions of Retail Supply Tariff Order. ➢ Street lighting maintained by NHAI in access-controlled highways are under LT-II(B) Commercial as they are of access-controlled highways wherein consumers are charged a toll to access and use such highway facilities. The act of charging a toll to access / use any facilities comes under the purview of commercial use and as such the street lighting maintained by NHAI are to be considered under LT-II (B) category. ➢ The Hon'ble Commission differentiates the tariff for street light services of the local bodies viz.,Panchayats/Municipalities /Municipal Corporations based on the tax revenue of the respective bodies. However, NHAI is collecting the toll fee from all the commuters on the National Highways. Hence, the billing category LT-II(B) considered is very much justified. ➢ The main intention of providing subsidized tariff for Street light services maintained by the local bodies is due to the limited tax revenue collected by them. Apart from the street lighting, the local bodies also provide additional services like drinking water, sanitization, primary health centers. The funds allotted by the local government to the local bodies are nominal only. Whereas the NHAI is being funded by the Central Govt as per the projects being undertaken. In addition to which, the NHAI is collecting the toll from the commuters which ensures revenue neutrality.
2.	Financial Loss: It is submitted that if street lighting on National Highways continues to be categorized under the LT-II (B) Commercial category, it will result in significant	

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	financial hardship for the NHAI. The tariff differential between the LT-II (B) (with Rs. 11/- unit for above 500 units) and LT-VI (A) (with Rs. 7.10/- unit) categories is substantial, with a difference of approximately Rs. 3-4 per unit (approx.35% -36%). This tariff differential will impose a heavy financial burden on NHAI since it is obliged to meet these increased costs for public safety measures. Accordingly, it is critical that streetlights on National Highways be categorized under LT-VI (A) Street Light category.	➢ If the request of NHAI for subsidized tariff on par with local bodies is considered, the Cross subsidy burden will increase on other category consumers which is against to the provisions of National Tarif Policy 2016. ➢ NHAI cannot be treated on par with local bodies. ➢ Hence, the Licensee requests the Hon'ble Commission to retain the existing LT-II(B) Category to the Street light services maintained by NHAI.
3.	It is pertinent to mention that Mission Bhagiratha, a safe drinking water project for every village in Telangana State, was initially not included under the LT-VI Category. However, Telangana Discoms in their Petition for determination Retail Supply Tariffs & Cross Subsidy Surcharge for FY 2023-24 proposed to categorize all Mission Bhagiratha services under LT-VI(B) or HT-IV(B) as applicable for respective voltage levels. This Hon'ble Commission vide Retail Supply Tariff Order dated 24.03.2024 approved the proposal of Telangana Discoms and modified the applicability of LT-VI(B) category and HT-lV(B) category to include Mission Bhagiratha scheme (a scheme intended for public safety), as under: -	Mission Bhagiratha, a flagship welfare program of the Government of Telangana for providing safe drinking water to every village, was classified under the LT-VI category at the time of its introduction itself, considering its public-utility and non-commercial nature, and the Hon'ble Commission subsequently reaffirmed this classification by approving its inclusion under LT-VI(B)/HT-IV(B) vide Tariff Order dated 24.03.2024; in contrast, access-controlled highways operate on a toll-based, user-pay model and therefore cannot be compared with Mission Bhagiratha for tariff classification.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
		

Existing 'Applicability' clause before inclusion of Mission Bhagirathi Schemes	Approved 'Applicability' clause including Mission Bhagirathi Schemes under LT-VI Street Lighting and PWS Schemes category as per Retail Supply Tariff Order dated 24.03.2024
9.7. LT-VI: STREET LIGHTING AND PWS SCHEMES **Applicability** 9.7.1. Applicable for supply of energy for lighting on public roads, streets, thoroughfares including Parks, Markets, Cart-stands, Taxi stands, Bridges and also for PWS schemes in the Local Bodies viz., Panchayats/ Municipalities/ Municipal Corporations. Metering is compulsory irrespective of tariff structure. […]	9.7. LT-VI: STREET LIGHTING AND PWS SCHEMES **Applicability** 9.7.1. Applicable for supply of energy for lighting on public roads, streets, thoroughfares including Parks, Markets, Cart-stands, Taxi stands, Bridges and also for PWS schemes and Mission Bhagiratha schemes in the Local Bodies viz., Panchayats / Municipalities / Municipal Corporations. Metering is compulsory irrespective of tariff structure. […]

It is submitted that same relief of inclusion of National Highways under LT-VI (A) Street Light' category. may be granted by this Hon'ble Commission while determining the Tariff and ARR in O.P Nos. 79 and 80 of 2025 for Telangana Discoms.

4. Response to South Central Railways

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	Indian Railways is a vital and largest transport organization of Government of India, have vast network for surface transport accessible to all sections of society and play important roles in economic and financial growth of the country. Railways serve the public at large and being a public utility, it should be supplied with electricity at a reasonable price which would reduce its requirement for diesel. In the process there would be saving of foreign exchange. It will also prevent upward revision of fares for transportation of passengers and goods by the Railways. If the fare for passengers & Goods is increased to offset fuel (energy) cost, it will add to overall inflation.	It is submitted that TGDISCOMs cater to the general public and, as public utilities, are obligated to supply electricity at reasonable and affordable rates to all categories of consumers, including domestic, commercial, industrial, railways & traction, agriculture, and others. Since inception, TGDISCOMs have been providing reliable and quality power supply to all consumers by continuously strengthening and expanding the distribution network across the entire state.
2.	South Central Railway avails traction power through 31 TSSs at 132 kV Traction sub-stations in the state of Telangana. The total connected load is 474 MVA and total consumption of Railway traction is 1302 million units projected for the year 2025-26 and paying a substantial amount of Rs. 914 Crores to DISCOMs in Telangana state. The Railways is a bulk consumer and pay major revenues to TGDISCOMs. Hence, the grievances of Railways are to be considered while fixing the tariff for HT-V (A) category.	TGDISCOMs have the responsibility of serving all categories of consumers, including both small and bulk consumers, and have accordingly proposed the tariff after carefully considering the implications for all consumer segments. It is respectfully submitted that, without adequate recovery of the costs incurred in procurement, distribution, and maintenance, the DISCOMs would not be in a position to ensure supply of electricity to it's consumers.
3.	The Railways is a bulk consumer and pay major revenues	TGDISCOMs acknowledge the grievances submitted.

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<tr><td></td><td>to TGDISCOMs. Hence, the grievances of Railways are to be considered while fixing the tariff for HT-V (A) category.</td><td></td></tr>
<tr><td>4.</td><td>Government of India and state governments have taken policy decisions to encourage public/private electric road vehicles for decarbonization of transport system to reduce carbon footprint and protect the environment. Government of India (Ministry of Railways) took policy decision to electrify its entire existing Railway network over Indian Railways on fast-track mode to enrich carbon free transportation and 99.2% of BG routes of IR have been electrified.
The hike in electricity tariff of Railway Traction will affect the operating cost of Railways, which may result in high freight charges, commodity prices and thereby rise in inflation and burdening common man and public of all sectors.
Rising operating costs in a labor-intensive Railway organization have a direct impact affecting financial sustainability, manpower planning and employment expansion.</td><td>TGDISCOMs make continuous efforts to provide electricity to people across Telangana at affordable prices. Even though the costs of power purchase, operations, and maintenance have gone up over the years, tariffs were not revised over past decade, except for the increase during FY 2022–23.</td></tr>
<tr><td>5.</td><td>Cost of Service for Railway Traction: The proposed Cost of service for Railway Traction is as follows:<table><tr><th>Discom</th><th>Cost of Service Rs/KWH</th></tr><tr><td>TGSPDCL</td><td>5.97 (As per the ARRs submitted)</td></tr></table></td><td>As per Clause 8.3 of the National Tariff Policy, 2016, tariff design is based on the linkage of tariffs to the Average Cost of Service not the category cost of service.</td></tr>
</table>

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<tr><th>S.No.</th><th>Summary of Objections / Suggestions</th><th>Response of the Licensee</th></tr>
<tr><td></td><td>
<table>
<tr><td>TGNPDCL</td><td>5.63 (As per the ARRs submitted)</td></tr>
<tr><td>Average</td><td>5.80</td></tr>
</table>
The comparison of cost of service and existing/proposed tariff for Railway traction HT-V(A) category is given below.
<table>
<tr><th>Year</th><th>Average COS of Discoms</th><th>Existing/Proposed Traction tariff</th><th>% Variation</th></tr>
<tr><td>2026-27</td><td>5.80/KWH</td><td>7.03/KVAH</td><td>21%</td></tr>
</table>
From above, it may be seen that the traction tariff is higher by 21% over cost of service which is against the provisions of National Tariff policy.
The COS is being calculated in terms of KWh and energy is being charged for Railway traction in terms of KVAh.
National Tariff Policy:
As per the National Tariff Policy-January 2016, the tariffs shall progressively reflect the Cost of Supply. From the table above, it is noted that the percentage difference between the average cost of service of the two DISCOMs and the traction tariff proposed is 21% more, which is in contravention to the National Tariff Policy.
</td><td>And the tariff for traction service is within 20% of Average Cost of Service of state/ DISCOM in line with national Tariff Policy 2016.</td></tr>
<tr><td>6.</td><td>Existing/Proposed Traction Tariff for 2026-27:
Existing/proposed traction tariff with demand charges of Rs. 500/kVA and Energy Charges Rs.5.05/kVAh, which is equivalent to Rs. 7.03/kVAh is already at very high and unreasonable for national transporter like Railways.</td><td>When compared with the prevailing tariffs in comparable states, Telangana does not levy the highest electricity tariff. A comparison of demand charges and energy charges across comparable states is presented below:
<table>
<tr><td>S.No</td><td>State</td><td>Demand charge</td><td>Energy charge</td></tr>
</table>
</td></tr>
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<table>
<tr><th>S.No.</th><th>Summary of Objections / Suggestions</th><th>Response of the Licensee</th></tr>
<tr>
<td></td>
<td>
Higher traction tariff slashes Rate of Return (ROR) for the new electrification projects, existing electrification projects and upgradation of existing electrification works which are under progress and may make them non- viable.
Further, it is worth to mention that SC Railways operates train services around the clock both during the day and at night, contributing to maintain and increase grid stability during off-peak load hours.
The details of existing Railways Traction Tariff rates with other states – a comparative statement:
<table>
<tr><th>Sl. No.</th><th>State</th><th>Demand Charges In Rs./kVA</th><th>Energy Charges in Rs./kVAH</th><th>Average Unit Price in Rs.</th></tr>
<tr><td>1</td><td>Odisha</td><td>250</td><td>5.30</td><td>6.29</td></tr>
<tr><td>2</td><td>Kerala</td><td>250</td><td>4.80</td><td>5.79</td></tr>
<tr><td>3</td><td>Chhattisgarh</td><td>375</td><td>5.25</td><td>6.74</td></tr>
<tr><td>4</td><td>Maharashtra</td><td colspan="2">Under Open Access</td><td>5.84</td></tr>
<tr><td>5</td><td>Karnataka</td><td colspan="2">Under Open Access</td><td>6.09</td></tr>
<tr><td>6</td><td>Madhya Pradesh</td><td colspan="2">Under Open Access</td><td>5.60</td></tr>
<tr><td>7</td><td>Gujarath</td><td colspan="2">Under Open Access</td><td>5.72</td></tr>
<tr><td>8</td><td>Jharkhand</td><td colspan="2">Under Open Access</td><td>5.16</td></tr>
<tr><td>9</td><td>Bihar</td><td colspan="2">Under Open Access</td><td>6.32</td></tr>
<tr><td>10</td><td>Uttar Pradesh</td><td colspan="2">Under Open Access</td><td>5.67</td></tr>
</table>
The details of average unit cost of open access rates over Indian Railway and traction tariff rates in Telangana state – a comparative statement:
</td>
<td>
<table>
<tr><td></td><td></td><td>(Rs/KVA)</td><td>(Rs/Unit)</td></tr>
<tr><td>1</td><td>Telangana</td><td>500</td><td>5.05</td></tr>
<tr><td>2</td><td>AP</td><td>350</td><td>6.50</td></tr>
<tr><td>3</td><td>Karnataka</td><td>355</td><td>6.50</td></tr>
<tr><td>4</td><td>Tamil Nadu</td><td>608</td><td>7.75</td></tr>
<tr><td>5</td><td>Maharashtra</td><td>650</td><td>7.29</td></tr>
</table>
The above comparison demonstrates that the tariff applicable to the Railway category in Telangana is competitive and is either comparable to or lower than the tariffs prevailing in other similar states.
TGDISCOMs further submits that power purchase costs, generation mix, geographical factors, renewable availability, and PPAs vary significantly from state to state. Accordingly, the cost of supply and tariff structure cannot be uniform across states, and tariffs are necessarily reflective of state-specific conditions.
</td>
</tr>
</table>

<table>
<tr><th>S.No.</th><th>Summary of Objections / Suggestions</th><th>Response of the Licensee</th></tr>
<tr><td></td><td>
<table>
<tr><th>Sl. No.</th><th>Financial Year</th><th>Average unit cost in Rs/Unit in the states under open access over Indian Railways.</th><th>Average unit cost in the state of Telangana in Rs/Unit</th><th>Difference in Rs.</th></tr>
<tr><td>1</td><td>2021-22</td><td>5.56</td><td>5.72</td><td>+0.16</td></tr>
<tr><td>2</td><td>2022-23</td><td>6.40</td><td>7.00</td><td>+0.60</td></tr>
<tr><td>3</td><td>2023-24</td><td>6.14</td><td>6.94</td><td>+0.80</td></tr>
<tr><td>4</td><td>2024-25</td><td>5.68</td><td>7.03</td><td>+1.35</td></tr>
<tr><td>5</td><td>2025-26 (up to Sep-25)</td><td>5.49</td><td>7.03</td><td>+1.54</td></tr>
</table>
• Comparison highlights relative high tariff burden in Telangana state.
• Other states offer traction-friendly tariff structures.
• Align Telangana traction tariff with national benchmarks.
• Tariff rationalization directly impacts freight cost, passenger fares and state economy.
</td><td></td></tr>
<tr><td>7.</td><td>Tariff Schedule of Hyderabad Metro Rail (HMR) and Indian Railways:
<table>
<tr><th rowspan="2">Consumer</th><th colspan="3">Existing/Proposed Tariff</th></tr>
<tr><th>Demand Charges Rs/KVA</th><th>Energy Charges Rs/KVAh</th><th>Average unit rate Rs/KVAh</th></tr>
<tr><td>HMR-HT-V(B)</td><td>500</td><td>4.95</td><td>6.93</td></tr>
<tr><td>Railways HT-V(A)</td><td>500</td><td>5.05</td><td>7.03</td></tr>
<tr><td colspan="3">% increase over HMR</td><td>1.44</td></tr>
</table>
It is evident from the preceding data that there is a 1.44% more difference in the current tariff between HMR and Railways. Further, it is worth to mention that SC Railways operates train services around the clock both during the day and at night, contributing to maintain and increase grid stability during off-peak load hours, whereas HMR</td><td>The marginally lower tariff provided to HMR aims to support urban transportation, as HMR requires significantly higher investment for pillar construction and overhead traction systems compared to SCR. Further, higher compensation is payable for property demolitions in urban areas. In view of these factors, the Licensees have proposed demand and energy charges to ensure sufficient cost recovery.</td></tr>
</table>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	operates only with a fixed load during the day and no load during the night.	
8.	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 Telangana state. Electrification projects recently completed: Electrification Projects completed in last 3 yrs.: 1186 Kms I. Peddapalli - Nizamabad: 178 Km II. Falaknuma– Mahbubnagar Doubling with Electrification:98 Km. III. Malkajgiri – Medchal doubling with Electrification: 24 Km IV. Mahbubnagar – Kurnool Town: 128 Km. V. Medchal - Dharmabad : 166 Km. VI. Devarakhadra – Krishna: 65 Km VII. Janakampet – Bodhan : 27 Km. VIII. Moulali – Ghaktkesar (Quadruppling): 24 Km. IX. Kazipet – Ballaharsha (Tripling): 185 Km. X. Vikarabad – Matakunta: 79 Km. XI. Akanapet – Medak: 17 Km. XII. Kazipet – Vijayawada (Tripling): 195 Km.	TGDISCOMs have been undertaking significant capital investments to strengthen and expand the electrical network with the objective of ensuring reliable and widespread access to electricity. Recovery of these costs is therefore essential for the Licensees to sustain operations and continue providing quality, reliable, and uninterrupted power supply to all consumers.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	9.2 Electrification projects under progress: 342 Km. i. Kazipet – Balharshah (Tripling): 18 Km ii. Kazipet – Vijayawada (Tripling): 25 Km iii. Medchal – Mudkhed (Doubling): 171 Km. iv. Mahbubnagar-Kurnool Town (Doubling): 128 Km. 9.3 Electrification projects under sanction: 149 Km. i. Manoharabad – Kothapalli: 149 KM. 9.4 Electrification projects under proposal stage and yet to be sanctioned: 622 Km. i. Sattupalli – Kovvur:95 Km. ii. Manugur – Ramagundam:200 Km. iii. Macherla – Nalgonda: 92 Km. iv. Kondapalli – Kothagudem: 125 Km. v. Kazipet – Ghatkesar: 110 Km. a) Above New Line project sections are planned to be electrified in Telangana state. Existing high traction tariff affecting badly and not viable the upcoming electrification projects and slow down the existing projects also in Telangana state and effects the development of infrastructure works in the state of Telangana. b) Further, Railway Board have chosen Railway network work over Telangana region to upgrade the traction system from existing 1x25 KV system to 2x25 KV system to enhance existing carrying capacity to realize Mission 3000 MT master plan of PMO office, wherein	

<table>
<tr><th>S.No.</th><th>Summary of Objections / Suggestions</th><th>Response of the Licensee</th></tr>
<tr><td></td><td>connected loads and power demand are envisaged to increase significantly
c) Details of 2x25 kV AT system upgradation Projects in the state of Telangana over S.C. Railway:

I. 2x25 kV AT system upgradation works awarded and execution in progress:

<table>
<tr><th>Sl.No.</th><th>Section</th><th>Length in Km.</th></tr>
<tr><td>1</td><td>Balharshah-Ramagundam</td><td>142</td></tr>
<tr><td>2</td><td>Secunderabad - Kazipet</td><td>131</td></tr>
<tr><td>3</td><td>Kazipet – Dornakal Jn.</td><td>96</td></tr>
<tr><td>4</td><td>WADI - Vikarabad</td><td>112</td></tr>
<tr><td>5</td><td>Ramagundam - Kazipet</td><td>92</td></tr>
</table>

II. 2x25 kV AT system upgradation works Sanctioned, yet to be awarded:

<table>
<tr><th>Sl.No.</th><th>Section</th><th>Length in Km.</th></tr>
<tr><td>1</td><td>Kondapalli - Khammam</td><td>85</td></tr>
<tr><td>2</td><td>Khammam – Dornakal Jn. – Badrachalam Road.</td><td>78</td></tr>
<tr><td>3</td><td>Mahbubnagar - Dhone</td><td>184</td></tr>
<tr><td>4</td><td>Pagidipalli – Guntur - Motumari</td><td>337</td></tr>
<tr><td>5</td><td>Medchal - Mudkhed</td><td>225</td></tr>
</table>

d) In the second phase, it is proposed to convert the balance sections from the existing 1 × 25 kV AC traction system to the 2 × 25 kV AC traction system.</td><td></td></tr>
<tr><td>9.</td><td>Incentive on Prompt/early payment:
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 in Odisha state. In Odisha,</td><td>TGDISCOMs acknowledge and sincerely appreciate Railways for prompt payments. However, it is respectfully submitted that, at present, there are no approved provisions or policies within the scope of the DISCOMs that allow for the extension of any rebates or incentives for prompt or early payments.</td></tr>
</table>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	Railways entitled to a rebate of 1% (one percent) of the amount of monthly bill (excluding all arrears).	
10.	Off peak time loads for Railway Traction: It is to mention that Railway traction is power intensive and loads are for passenger & goods train services which are run round the clock. There is no distinction of peak to non-peak hours. Thus Railways are improving base loads of DISCOMs and supporting the grid stability. Apart from this, Railways is maintaining higher power factor.	Off-peak incentives are designed to encourage load shifting from peak periods. Railway traction demand is continuous and non-flexible, with no or low scope for load shifting. Since off-peak incentives would not yield any additional operational or demand-management benefit, railway traction is neither penalized during peak hours nor incentivized during off-peak hours.
11.	Unblocking of leading kVArh: As per the Para no. 3.21.20 of Hon'ble TGERC order, Tariff for Retail sale of Electricity for FY-2025-26, has approved the TGDISCOMs proposal for unblocking of leading kVArh for the purpose of kVAh billing with a three (3) months prior notice. It is prayed to consider the following points from Railways end and relieve the financial burden on Railways due to unblocking of leading kVArh. • Railway traction load changes every moment. Matching reactive power in real time is difficult in this system. • When Railways operate in leading VAR, they supply reactive power to the grid. This supports grid voltage,	a) While traction load is highly variable, reactive power, whether lagging or leading, causes increase in current and thus imposes additional burden on the network. b) Uncoordinated/ Uncontrolled leading reactive power may also cause over-voltage, increase system losses also pose damage to the system.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	but increasing kVAh billing due to tariff design, resulting in higher traction energy cost, there by improves voltage profile and reducing upstream system losses. • Fixed capacitor banks stay in service to maintain power factor. During low load, these inject reactive energy into the grid. • Traction loads are inherently dynamic and highly schedule-dependent, which limits effective real-time power factor control. In view of these operational constraints, imposition of power factor penalties under such conditions is technically inequitable. • Traction power varies with train movement and passenger schedules, Railways have limited control over power factor during live operations. Penalizing this is not technically fair. • Grid rules and tariff policies do not mandate billing for leading VAR unless voltage rising issues occur. Railways have not caused such problems. • The current billing method penalizes Railways without giving any credit for helping the grid during off-peak periods, when it helps to maintain grid stability during low load condition, the leading kVARh injected by Railways during low load period acts as a dynamic	c) Capacitors remaining switched ON during low load conditions injecting reactive energy into the grid causes adverse impact on the grid performance. d) kVAh billing is a cost-reflective mechanism and not a penalty. Operational constraints cannot be a basis for differential treatment, as network impact remains the same. e) Though real-time control is challenging, reactive energy irrespective of its nature affects system capacity and losses, and therefore must be accounted for in billing. f) The Hon'ble Commission, after due examination and consideration of all relevant aspects, has approved the proposal for unblocking of RkVAh lead for kVAh billing, having recognized the technical necessity and justification for the same. g) As stated by the objector in the queries above, Railway operations are schedule-based and traction loads are dynamic in nature; therefore, any leading reactive power injection occurs only during specific operating periods and not uniformly across all off-peak hours. Hence, such intermittent and non-dispatchable reactive power cannot be considered as a

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	compensation source that improves grid voltage, stability and reduces the line losses, acting as an ancillary service. Therefore, applying penalties on leading kVARh is technically unjustified. • Installing advanced dynamic compensation needs high investment and long timelines like PQR (Power Quality Restorer). • Railways are a national service. Their power system is not comparable to regular commercial users. "In light of the above submissions, it is prayed that Railways may be exempted from levy of charges on leading reactive energy. The Railway traction system inherently contributes to grid stability, and the occurrence of momentary leading VAR during traction operations is unavoidable and operationally intrinsic. Railways may therefore be considered as a special case, and billing may be confined to lagging reactive energy only, without levying any charges on leading reactive energy (kVArh)" to avoid financial burden on the Railways.	consistent grid support service warranting credit. h) The Commission has provided advance notice for implementation. Consumers may adopt appropriate power factor correction measures in a phased manner. i) TGDISCOMs respect Railway's role in national service. However, the tariff design must remain non-discriminatory and cost-reflective across TGDISCOM's consumer categories.
12.	Railways Planning to avail traction power through open access. • It is brought to the kind notice of the Hon'ble commission; Indian Railways are already availing power through "Open access" in 14 states. The	a) The Deemed Distribution Licensee status for Indian Railways was withheld by Hon'ble APTEL in its judgment. As per the provisions in the Electricity Act 2003 under section 42(2)

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	"Deemed Distribution Licensee" status of Railways is under sub-judice at Hon'ble Supreme Court. However, Hon'ble Supreme Court in its interim orders dated 06.05.2024 and 08.11.2024, clarified that open access for Railways shall not be denied and cross subsidy and additional surcharges are not liable to pay till final order of the Hon'ble Supreme Court. South Central Railway submitted application for grant of GNA NOC with TGTRANSCO on 17.06.2025 to avail power through open access as" Drawee entity connected with Intra-State Transmission System" as per CERC, General Network Access (GNA) Regulations'2022. • Availability of ABT meters is a mandatory requirement for availing power through Open Access. An amount of ₹14.30 crore was deposited with TGTRANSCO by Railways during 2017–18, as per the estimates submitted by TGTRANSCO. However, despite extensive correspondence between Railways, TGTRANSCO, and TGDISCOMs, no substantial progress has been made in providing ABT meters compatible with Open Access in accordance with the latest regulations and guidelines in force. • As per Section 39, 2 (d) Indian Electricity Act-2003, STU to provide non-discriminatory open access to its	& 42(4) any Open Access consumer is required to pay CSS& AS determined by the Hon'ble Commission in its Tariff orders including Indian Railways. b & c) TGDISCOMs are processing the request of Railways as per Standard Operating Procedures of TGDISCOMs.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	transmission system for use by all the entities eligible as per the Regulations in force. • High traction tariff for Railways, forcing Railways to explore the other alternatives to avail traction power through bilateral arrangements under Open Access to reduce the cost of energy billing. Reasonable, competitive and low traction tariff for Railways on par with the other open access states is requested to retain bulk consumer and prompt payer of electricity bills.	d) The replies to this have already been answered above
13.	Railways prayed: a) Railway traction tariff shall be on par with open access rates (average open access rate for Railways is Rs. 5.49/unit) in other states of Railways. Reasonable traction tariff for Railways may be considered to retain a bulk consumer and prompt payer like Railways. Reasonable traction tariff on par with the open access rates will further give impetus to Railway electrification projects and traction system upgradation from 1x25 kV system to 2x25 kV system over the Railway network in the state of Telangana. Railway Electrification is environment friendly, energy efficient and reduces carbon footprint, which further reduces the import burden of high-speed diesel.	The replies to this have already been answered above.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	b) Existing high traction tariff for Railways has been affecting the ongoing Railway Electrification projects which are under progress in the state of Telangana. This will have a detrimental effect on the electrification projects and other upcoming infrastructure projects in the state of Telangana. c) In this circumstance, existing/proposed tariff by TG Discoms equivalent charges of Rs 7.03 /kVAh (with average load factor 35%) is high and unreasonable. Higher tariff compared to “open access” and burdening the bulk consumer like Railways.	
14.	Conclusion: Railway traction provides base load, maintains high power factor and save imported fissile fuel, apart from speedy, energy efficient and environmentally friendly public transport. Encouragement for new electrified sections for development of infrastructure in the state of Telangana and also act as growth engine for the economy of country largely. Keeping the above in view, Hon’ble commission is requested to consider and it is prayed that, a) The existing high traction tariff under category HT-V (A) Railway traction is to be reduced for the above-mentioned reasons as per the provisons of National Tariff Policy, to encourage electrification projects in Telangana state. b) Railway Traction Tariff in line with Hyderabad Metro	The replies to this have already been answered above.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	Rail, may be considered to avoid disparity, discrimination and injustice between the two public transport systems. c) Railway Traction tariff reduction may be considered by exempting Railways from the burden of cross subsidy surcharge by virtue of provisions contained in the National Tariff Policy issued by Ministry of Power on 28th January - 2016. d) To give impetus to electrification of Railway network, it is requested to consider the reasonable rebate/ incentives for prompt payment of monthly energy bills. e) Blocking of leading kVArh to be considered for Railways to avoid financial burden on the Railways in view of reasons/clarifications mentioned at P.No.11. f) In the circumstances explained above, the Hon'ble Commission is humbly requested to kindly consider the objections submitted by the Railways and to review, rationalize, and suitably revise the existing tariff schedule and policies governing Railway Traction, keeping in view the Railways' status as a bulk consumer and a prompt payer of energy charges.	

5. Response to Mr. Venkat N.K.K, Independent Member- CGRF (Rural)- (TGSPDCL), General Secretary - Telangana State Solar Open Access DEVELOPERS' Association (TSOADA), Member- Energy Committee- Federation of Chamber of Commerce of Telangana (FTCCI)

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	Cross Subsidy Surcharge: - Objection to Proposed Increase in CrossSubsidy Surcharge (CSS):- The proposal of TGSPDCL to increase the Cross Subsidy Surcharge (CSS) by more than 11% — for example, for 33kV (HT-1A) consumers from ₹1.56 per unit to ₹1.73 per unit — is contrary to the express mandate of theElectricity Act, 2003 and the statutory policies issued thereunder. In terms of Section 42(2) of the Electricity Act, 2003, read with Clause 8.3 of the National Tariff Policy, 2016 (as amended in 2023) and Para 5.4.7 of the National Electricity Policy, 2005, both cross subsidy and cross subsidysurcharge are required to be progressively reduced so as to move towards cost-reflective tariffs. ……	TGDISCOMs submits that the Cross Subsidy Surcharge (CSS) for FY 2026-27 has been calculated in line with the National Tariff Policy, 2016, considering the existing consumer mix, cost of supply and applicable tariffs. The proposed CSS is restricted within ±20% of the Average Billing Rate (ABR) for the concerned consumer category, as prescribed under the policy. TGDISCOMs remains committed to the progressive reduction of cross subsidy and CSS in the system and will continue to do so.
2.	Exemption from lead un-block for open access solar power plants: Solar Open Access Generators were given HT service with minimum 70 KVA load as against Solar Projects selling power to TGSPDCL, who are netted off with their gross generation. This is discriminatory treatment of OpenAccess Generators, as compared to similarly placed	The Tariff order mandates uniform application of the approved metering and billing provisions to all applicable consumers connected to the distribution system, including grid-connected solar generating stations, since drawal and injection of energy and reactive power impact the distribution network. Uncontrolled injection of leading reactive power, particularly during low-

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	solar generators, it is expressly prohibited under theElectricity Act, 2003. Open Access is a statutory right and cannot be frustrated through arbitrary conditions,higher charges, or operational restrictions.We also wish to bring on record that solar power plants operate as generators and not as consumers, particularlyduring night hours or during periods of zero generation. Technical Position 1) Generator-mode reactive behavior: During night hours or under low irradiance conditions, transformers and HT lines/cables inherentlyoperate in a capacitive mode, causing export of capacitive kVArh (lead) to the grid even when activepower export is zero. This is a natural characteristic of grid-connectedgenerating stations and not aconsumer load behavior. 2) Recorded MD during non-generation: We have only about 5–8 kW auxiliary consumption during non-generation hours; however, the maximumdemand recorded is 18–30 kVA, solely due to the transformer no-load losses and the capacitive reactivecharacteristics of the 33 kV line. 3) HT Agreement CMD requirement: Even though our actual auxiliary requirement is very low,	load or non-generation periods, adversely affects voltage profile, system stability, and network operations. Accordingly, proper measurement and accounting of reactive energy, including leading kVARh, is essential for maintaining grid discipline and efficient system operation, as recognised in the Tariff Order. It is the responsibility of the consumer to regulate and control such reactive power by absorbing it from the grid ,whenever required rather than injecting the same. The directions of the Hon'ble Commission regarding **unblocking of metering of lead KVARh** have been issued in the **Tariff Order after due regulatory scrutiny** and are intended to ensure **accurate measurement of energy exchange and grid discipline**, in line with the provisions of the Electricity Act, 2003 and the applicable Regulations. It is a fact that solar power plants draw power from the grid during night hours not for start-up activities, but exclusively for lighting loads, and in that context, the solar power plants are treated as consumers. Hence, it does not follow that the **technical directions issued by the Hon'ble Commission in the Tariff Order are inapplicable** to such plants. The Tariff Order does not provide any explicit exemption to generating stations, including solar plants, from the applicability of metering provisions relating to reactive energy. It is submitted that **reactive power management is a critical element of grid operation**, irrespective of whether the entity is a consumer or a

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	we hold an HT agreement with TGSPDCL for 70kVA CMD, only to comply with the minimum kVA requirements specified by TGERC for allotment of an HTService Connection Number. 4) Purpose of unblocking “kVArh Lead”: The intention behind unblocking the leading reactive register is to discourage capacitive injection/drawlby consumers. However, solar panels neither draw or injects capacitive reactive power. 5) Compliance during actual generation: During daytime generation, solar plants maintain power factor well within the limits specified byDISCOM, CEA regulations and the State Grid Code. Our Request In view of the above factual and technical circumstances, we humbly request that Solar Power Plants may kindlybe exempted from the “kVArh Lead Unblock” provision asleading reactive energy export is natural, unavoidableand inherent to generator-type systems, and not attributable to consumer-side behavior. This selective application only to Open access generators is hostile, discriminatory, arbitrary and contrary toSections 38(2)(d), 39(2)(d), 40(c) and 42 of the Electricity Act, 2003 which mandate non-discriminatory openaccess.	generator. Injection of leading reactive power by solar plants, particularly during low load and non-generation conditions, has a **direct impact on voltage profile, system stability and power quality** of the distribution network. The directions for unblocking of lead KVARh metering have been issued to ensure that **reactive energy is properly recorded and accounted for**, so as to discourage excessive injection of leading reactive power and to promote efficient grid operation. These directions are **technical and operational in nature** and are not linked solely to the consumer category or end-use of electricity. Promotion of renewable energy does not imply exemption from **grid discipline, metering requirements or operational controls**. Renewable generators are equally required to comply with the regulatory framework governing system operation. Whenever the plant is connected to the distribution system whether during generation or non-generation hours it becomes a **grid-interfacing entity** whose reactive power injection or absorption directly affects **voltage profile, network loading and system stability** and therefore cannot seek blanket exemption from metering provisions merely on the basis of its generating status. During non-generation hours, when the solar generator draws power from the grid for auxiliary consumption, lighting, control systems, inverters and grid-support operations, such drawal constitutes

S.No.	Summary of Objections / Suggestions	Response of the Licensee
		consumption of electricity from the distribution system. For such periods, the solar generator **squarely falls within the scope of an HT consumer** under the applicable Tariff Order.
3.	Lead Unblock- Exemption to consumers with less than 1 MW CMD & Deferrement to all other consumers till detailed study:- Clause 3.21.14 of the Retail Supply Tariff Order for FY 2025-26 dated 29.04.2025 states as under:"In the Tariff Order for FY 2024-25, the Commission directed the TGDISCOMs to carry out an impact assessment study on unblocking of kVArh, conduct comprehensive consumer awareness programmes across the State, and submit the study report to the Commission before the nexttariff filing." It is observed from Clause 3.21.15 that the TGDISCOMs have submitted the impact assessment study, wherein the issue of leading power factor has been addressed only in a summary manner, citing stress on the transmission and distribution network as the reason. Our Submissions: It is respectfully submitted that: Lagging power factor: consumes reactive power (+kVAr)->	TGDISCOMs submit that reactive power, whether lagging or leading, results in an increase in current flow, thereby necessitating additional network capacity. The FOR observed that there is no difference between leading and lagging power factor in reduction of network capacity and increasing the energy and power losses. Uncontrolled injection of reactive power (leading VARs) can cause operational issues such as over-voltage conditions and inefficient utilization of network assets. For better grid discipline, lag plus lead billing system gives meaningful kVAh as static meters are envisaged the measurement of both leading and lagging reactive power. Capacitors should remain in circuit as long as the load runs and must be cut-off as soon as the load is switched off. However, in the existing lead block billing system, the lead pf will be treated as unity.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	Reactive power is drawn from the grid by loads. Leading power factor: supplies reactive power (–kVAr) -> Reactive power is injected into the grid by loads. Thus, reactive power injected by one consumer is, in practice, absorbed by another consumer within the same distribution system. As a matter of fact, our Distribution networks (TGSPDCL & TGNDCL) are dominated by inductive loads due to widespread use of Induction motors, transformers, extension of 24 Hours supply toagricultural pump sets. In such scenarios supply of reactive power from certain consumers reduces the net reactive burden on the grid. The study conducted by TG DISCOMS did not to evaluate the current reactive powerrequirement of DISCOMs and that how DISCOMs will manage when such reactive power is not supplied by certainconsumers. In this context, it is pertinent to note that several distribution systems across various countries recognise and compensate for reactive power services as a grid-support function. No doubt the ideal scenario for the Utilities shall be that every consumer operating in the unity power factor. Butthis is practically not possible due to presence of	As a result, some of the consumers were keeping their capacitors in ON condition even when no load is connected to the system thereby maintaining leading PF i.e. on the pretext of maintaining unity pf, consumers were overcompensating. Such condition not only injects reactive power into the system but also is detrimental to the healthiness of the Grid for various reasons such as the utilization of transformer capacity (KVA) is blocked due to increase in current, line loss gets increased due to increase in current, over-voltage problem occurs in secondary side of transformer etc. This is not only harmful to grid but also to the consumer's equipment which is connected to system. Hence, unblocking of RkVAh lead is warranted for all HT services to use electricity at Unity PF. The APERC has issued order for unblocking of KVARh lead for the purpose of computation of KVAh and is being implemented by APDISCOMs since 2019. Further, MSERC in its order dt. 02.01.2019 observed that "RkVAh lead" needs to be considered in computation of PF/kVAh and the consumers are to install required equipment or make necessary changes in their processes so as to maintain PF within the prescribed limits.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	millions of agricultural pump sets and lack of monitoringmechanisms of such pump sets. …… Request In view of the above, it is humbly prayed that the Hon'ble Commission may be pleased to: 1. To Constitute an expert committee comprising representatives from industry associations, reputedtechnical institutions (such as IITs/NITs/JNTU),generators, and other relevant stakeholders, as deemedappropriate by the Commission. 2. To Undertake a detailed study of the techno-commercial implications of unblocking leading kVArh and its impact on consumers and the distribution system; and 3. To Direct the DISCOMs to undertake widespread consumer awareness programmes prior to implementation of any decision based on the recommendations of the said committee. 4. To direct DISCOMs to Rectify the excess billing done in the lead kvah unblock conditions till the final decision is taken in this regard.	The Hon'ble TGERC after due public consultation process has approved for unblocking of KVARh Lead. Hence, considering the report of Apex body like FoR, other state Regulatory Commissions i.e. APERC & MSERC orders on unblocking of KVARh Lead in terms of the safety of GRID, it is not necessary for formation of committee for studying the impact of KVARh lead as the behaviour of the KVARh lead is same on the Grid. The DISCOMs have already addressed the grievances of consumers having issues with reactive power through field level interactions. However, the DISCOMs are open to create awareness to the needy consumers on controlling the reactive power.

6. Response to M. Thimma Reddy

<table>
<tr><th>S.No.</th><th>Summary of Objections / Suggestions</th><th>Response of the Licensee</th></tr>
<tr><td>1.</td><td>
Table 1: Electricity Sales growth (MU)
<table>
<tr><td>Year</td><td>SPDCL</td><td>NPDCL</td><td>Total</td><td>Growth (%)</td></tr>
<tr><td>2023-24</td><td>53,325</td><td>21,064</td><td>74,389</td><td>---</td></tr>
<tr><td>2024-25</td><td>56,183</td><td>22,043</td><td>78,226</td><td>5.16</td></tr>
<tr><td>2025-26</td><td>57,089</td><td>23,741</td><td>80,830</td><td>3.33</td></tr>
<tr><td>2026-27</td><td>63,753</td><td>26,371</td><td>90,124</td><td>11.50</td></tr>
</table>
TGDISCOMs have claimed to have applied category wise CAGR trend during the last 5 years, 4 years, 3 years, 2 years, 1 year over the previous year to arrive at energy requirement during FY2026-27. But there was no proper justification for using the particular CAGR in the case of different consumer categories. In fact in many cases, they have used ‘manual growth rates’. The final power consumption/sales figures arrived by TGDISCOMs for FY 2026-27 do not seem to have any relation to the past experiences. As the above table shows during the FY 2024-25 electricity consumption increased by 5.16% and during the FY 2025-26 electricity consumption increased by 3.33%. But during the ensuing FY 2026-27 electricity consumption is estimated to increase by 11.50%. This is two times the consumption growth rate recorded during FY 2024-25 and three times the consumption growth rate recorded during FY 2025-26. Obviously, electricity consumption estimated to take place during FY 2026-27 is overestimated. The same needs to be revised downwards.
</td><td>
The lower electricity consumption recorded during H1 of FY 2025-26, primarily due to an extended and intensive monsoon period, has resulted in a suppressed baseline for FY 2026. Accordingly, TGDISCOMs have adopted the CAGR based on FY 2024-25 consumption levels for projecting sales for FY 2026-27. When growth is calculated with respect to the lower consumption of FY 2025–26, the resulting figure appears higher at 11.50%. However, when benchmarked against FY 2024-25 (an operationally normal year), the effective growth rate is 7.3%, which is more realistic and consistent with historical demand patterns.
The objector considered growth only up to FY 2023-24. If we extend this analysis by two additional years, the following growth rates can be seen
<table>
<tr><th>Year</th><th>SP</th><th>NP</th><th>State</th><th>Growth rate</th></tr>
<tr><td>FY 2021-22</td><td>42,578</td><td>18,642</td><td>61,220</td><td>-</td></tr>
<tr><td>FY 2022-23</td><td>47,551</td><td>19,250</td><td>66,801</td><td>9.12%</td></tr>
<tr><td>FY 2023-24</td><td>53,379</td><td>21,064</td><td>74,443</td><td>11.44%</td></tr>
<tr><td>FY 2024-25</td><td>56,183</td><td>22,043</td><td>78,226</td><td>5.08%</td></tr>
<tr><td>FY 2025-26</td><td>57,089</td><td>23,741</td><td>80,830</td><td>3.33%</td></tr>
<tr><td>FY 2026-27</td><td>63,753</td><td>26,371</td><td>90,124</td><td>7.34%
(wrt FY 25)</td></tr>
</table>
In this context, the projected FY 2026–27 growth rate of 7.3% remains well within the normal range and aligns with past consumption behavior.

Additionally, it is important to note that the PM e-Drive initiative is expected to contribute to incremental energy demand.
</td></tr>
</table>

<table>
<tr><th>S.No.</th><th>Summary of Objections / Suggestions</th><th>Response of the Licensee</th></tr>
<tr><td>2.</td><td>During the FY 2026-27 agriculture services are estimated to consume 11,962 MU accounting for 39.79% of energy requirement in the case of TGNPDCL and 15,428 MU accounting for 21.45% of energy requirement in the case of TGSPDCL. TGDISCOMs have claimed to have projected this consumption by agriculture services as per connected load. They have not mentioned whether the Commission approved this method. They have not explained how they have used this method. It all depends on assumptions they made on number of days and number of hours of operation of pump sets each day. An important limitation of this method is that some of the agriculture services released are not in operation. This leads to overestimation of power consumption by agriculture services. Besides this, solarization of agriculture pump sets under KUSUM taken up in the State will have its impact on this estimate.</td><td>This method has been adopted based on the Commission's approach in earlier ARR orders. As mentioned in the Commission's analysis:
"Commission's analysis & findings:
3.4.39 The growth rates of actual agricultural contracted demands for the 4 years period before FY 2023-24 vis-à-vis the agricultural demand projected by TGDISCOMs for FY 2025-26 were analysed. LT-V Agricultural sales for FY 2025-26 were determined based on the demand claimed by TGDISCOMs in their petitions. For this purpose, an average operational period of 180 days per annum was considered for both the DISCOMs and an average daily operation time of 12 hours and 10 hours were considered for TGSPDCL and TGNPDCL respectively."

In current filings, TGDISCOMs have considered 12 hours of daily operation time and 180 operational days per year for both DISCOMs, since the nature of agricultural consumption is similar in both areas. Using the connected load indicated in the ARR filings, the sales figures have been calculated on the basis of 12 hours × 180 days. This method has been consistently used by the Commission for agricultural sales estimation. Therefore, TGDISCOMs have followed the same approach for estimating FY 2026-27 agricultural sales.

Load and Sales Projections for FY 2026-27
<table><tr><th>Particulars</th><th>NPDCL</th><th>SPDCL</th></tr><tr><td>Load Projections (hp)</td><td>7,421,344</td><td>8,205,026</td></tr><tr><td>Load Projections (MW)</td><td>5536</td><td>6121</td></tr><tr><td>Sales Projections (MU)
(Load in MW*12*180/10^3)</td><td>11958</td><td>15425</td></tr></table>
PM KUSUM

TGDISCOMs have already considered the generation from Solarization of Agricultural pumpsets under component-A & component-C of PM</td></tr>
</table>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
		KUSUM and Roof top solarization under PM Surya Ghar under Power purchase estimation for FY 2026-27 as per the capacities expected to be commissioned in the said financial year.
3.	In the past the Commission has directed the TGDISCOMs to install meters on DTRs serving agriculture pump sets to estimate electricity consumption by these agriculture services. To this direction TGDISCOMs responded that as feeders serving agriculture services are going to be segregated under RDSS metering these feeders will serve the purpose of estimating electricity consumption by these services. They have also mentioned that most of these feeders are already metered. TGDISCOMs are repeating this response over the last few years. They have also not given the timeline over which segregation of agriculture feeders will be completed. In the past TGDISCOMs had stated that they were not able to raise funds to take up metering DTRs connected to agriculture pump sets. But they are ready to take up smart meter programme which involves higher expenditure than metering agriculture DTRs. This indicates that TGDISCOMs have different priorities. In this background we request the Commission to direct TGDISCOMs to provide information on feeders that are exclusively serving agriculture services and mixed feeders; and provide time line over which mixed feeders will be segregated. In the case of mixed feeders which	The DISCOMs have proposed to undertake segregation of agricultural feeders under the RDSS program to enable better monitoring and accurate accounting of agricultural consumption subject to approval from GOI.

<table>
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<tr><td></td><td>cannot be segregated meters shall be installed on DTRs connected to agriculture pump sets.</td><td></td></tr>
<tr><td>4.</td><td>The two TGDISCOMs projected 3,877 MU electricity consumption by lift irrigation projects at 132 kV level during the ensuing financial year. The lift irrigation units linked to KLIP are not in full working condition due to damages to the barrages and pumping motors. Given these facts TGDISCOMs projections related to electricity consumption by these lift irrigation projects need to be re-examined. The TGDISCOMs also adopted different growth rates in estimating power consumption by lift irrigation projects at 11 kV and 33 kV level. While TGNPDCL adopted 2% growth TGSPDCL adopted 10% growth. At the same time, they did not provide any rationale for the growth rates adopted. They have adopted manual growth rate as “historical CAGR is erratic” They should be having information on ground level situation of lift irrigation schemes and the same should have been taken in to account.</td><td>The sales of SPDCL and NPDCL have been determined independently based on their respective historical actual sales and growth rates and hence the sales pattern of both DISCOMs needs to be looked at independently.
Few units linked to Kaleshwaram Lift Irrigation Project (KLIP) are non-functional and remain unchanged since FY 2024-25. There has been no additional reduction in operational usage thereafter. Hence, FY 2024-25 actuals already capture the impact of the same. KLIP is predominantly present in TGNPDCL territory which explains the relatively moderated growth ie., 2% NPDCL compared to 10% (for 11 kV and 33 kV) and 5% (for 132 kV) in SPDCL.
We would like to mention that historically LIS sales have been erratic (This is not specific to this year, Same is the case for previous years). Appropriate growth rate has been considered for projecting FY 2026-27 sales.</td></tr>
<tr><td>5.</td><td>Table 2: Power requirement 2026-27 (MU)<table><tr><th>Particulars</th><th>SPDCL</th><th>NPDCL</th><th>Total</th></tr><tr><td>Total requirement</td><td>71,916</td><td>30,065</td><td>1,01,981</td></tr><tr><td>Total sales</td><td>63,753</td><td>26,371</td><td>90,124</td></tr><tr><td>Total (T&D) losses</td><td>8,163</td><td>3,694</td><td>11,857</td></tr><tr><td>Total losses (%)</td><td>11.35</td><td>12.29</td><td>11.63</td></tr></table></td><td></td></tr>
</table>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	Table 3: T&D losses of TGDISCOMs Year | Electricity procured (MU) | Electricity sales (MU) | T&D losses (MU) | T&D losses (%) 2024-25 | 88,964 | 78,226 | 10,738 | 12.07 2025-26 | 90,609 | 80,830 | 9,779 | 10.79 More than one tenth of power procured is going waste due to T&D losses. T&D loss levels recorded during the FY 2025-26 are higher than that projected as a part of the ARR of that FY. T&D loss levels projected by TGDISCOMs for FY 2026-27 are higher than the T&D loss levels recorded during the previous FY. These high T&D losses are taking place even after substantial investments in men and materials to strengthen and expand T&D network. T&D losses shown by TGDISCOMs are also higher than that projected by the Commission in its Order on ARR of Retail Supply Business for 5th Control Period and Retail Supply Tariffs for FY 2024-25 of TGDISCOMs dated 28-10-2024. Lower T&D losses imply lower power requirement and lower power procurement costs.	TGDISCOMs respectfully submit that voltage-wise losses across LT, 11 kV, 33 kV, and intra-state transmission levels are considered in accordance with the loss parameters approved by the Hon'ble Commission in the TGERC Order on ARR of the Retail Supply Business for the 5th Control Period dated 28.10.2024. These loss levels continue to be reasonable and prudent in view of prevailing system conditions. Further, inter-state transmission losses have been considered based on the historically recorded average loss levels, duly factoring in the projected quantum of power procurement from inter-state generating sources. We would like to reiterate that the losses for different voltage levels are considered as per the MYT Tariff order and the difference in overall T&D loss figures is due to the variation in the projected sales mix from the approved numbers in the MYT Order dated 28.10.2024
6.	The Commission through the Order on ARR of Retail Supply Business for 5th Control Period and Retail Supply Tariffs for FY 2024-25 of TGDISCOMs dated 28-10-2024 estimated total power requirement during FY 2026-27 to be 92,202 MU. At the same time TGDISCOMs arrived at	TGDISCOMs have projected the category wise sales by incrementing the past year sales for FY 2024-25 with the CAGR in previous years keeping into account the new load additions. Further, the Energy requirement of the state is estimated by grossing up the sales projections with the voltage wise losses approved in the TGERC Order

<table>
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<tr><td></td><td>1,01,981 MU as their energy requirement during the same year. TGDISCOMs' estimate of energy requirement is 10% higher than that of the Commission.
From the above it is quite obvious that TGDISCOMs overestimated power requirement during the FY 2026-27. The same needs to be revised downwards reflecting ground realities.</td><td>on ARR of Retail supply business for 5th control period dated 28.10.2024.
It may be noted that TGDISCOMs have projected sales based on the latest available consumption trends and new load applications received. This will enable the projected sales to be aligned to the actual sales.</td></tr>
<tr><td>7.</td><td>Electricity availability:
Table 4: Power availability during FY 2026-27 (MU)<table><tr><th>Source</th><th>DISCOMs' 5th Control Period filings</th><th>TSERC Retail Supply Tariff and ARR 5th CP Order</th><th>DISCOMs' ARR Filings 2026-27</th></tr><tr><td>GENCO Thermal</td><td>70,009</td><td>55,887</td><td>55,887</td></tr><tr><td>GENCO Hydel</td><td>5,741</td><td>5,742</td><td>3,827</td></tr><tr><td>CGS</td><td>29,477</td><td>25,436</td><td>26,458</td></tr><tr><td>NCES</td><td>22,230</td><td>22,232</td><td>16,526</td></tr><tr><td>SEIL</td><td>2,006</td><td>1,773</td><td>1,886</td></tr><tr><td>Singareni</td><td>8,936</td><td>7,916</td><td>8,421</td></tr><tr><td>Short-term</td><td>1,093</td><td>---</td><td>---</td></tr><tr><td>Total</td><td>1,39,492</td><td>1,18,986</td><td>1,13,006</td></tr></table>Electricity availability is projected to increase from 95,711 MU in FY 2025-26 to 1,13,006 MU in FY 2026-27. That is, electricity availability is projected to increase by 18.07% during the ensuing financial year.
The ensuing FY will see a surplus of 11,025 MU (9.76%). If we take in to account the fact that TGDISCOMs overestimated power requirement during the ensuing FY the surplus power available will be even higher.
TGDISCOMs did not include short-term purchases under availability though they have mentioned that short-term</td><td>TGDISCOMs respectfully acknowledge that an electricity surplus of 11,025 MUs is projected for FY 2026–27, based on the estimated energy availability from generators and the overall energy requirement at the state level. TGDISCOMs are obligated to maintain adequate tied-up capacities to reliably meet both base and peak demand across most time blocks throughout the year.
As highlighted in the petition, procurement from short-term sources will be undertaken only when necessary.
To clarify, TGDISCOMs have considered short-term power purchases for the following purposes:
1. To address demand–supply gaps during hours when power requirement exceeds the available generation.
2. To optimize overall power procurement costs, by purchasing from the market during hours when market prices are lower than the variable cost (VC) of certain highVC generating stations.
Since TGDISCOMs do not maintain any tiedup capacity for short-term procurement, and such purchases depend entirely on real-time demand</td></tr>
</table>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	procurement would be resorted to depending on the need. Under power procurement cost TGDISCOMs included short-term power procurement. If this short-term procurement is also added total power available to TGDISCOMs during the FY 2026-27 the surplus power in Telangana during FY 2026-27 will be much higher.	supply conditions and prevailing market prices, including this power in the energy availability calculations would misrepresent picture of the state's actual supply position.
8.	Power availability from TGGENCO plants is projected to increase from 42,782 MU in FY 2025-26 to 59, 714 MU in FY 2026-27, signifying an increase of 40% in power availability from TGGENCO. But this increase in power availability depends on achieving CoD of all 5 units of YTPS. Until now CoD of three units (I, II and IV) was achieved. While the Commission, through its order on 5th Control Period, projected 22,232 MU availability from NCE sources during the FY 2026-27 TGDISCOMs projected 16,526 MU.	TGDISCOMs have considered the Energy generation from all the 5 units of YTPS for FY 2026-27 as per the commissioning dates confirmed by TGGENCO vide letter 03.09.2025 according to which all the 5 units of YTPS will be commissioned by February 2026.

<table>
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<tr><td>9.</td><td>

Table 5: Renewable energy availability (MU)

Particulars	TSERC Retail Supply Tariff and ARR 5th CP Order	DISCOMs' ARR Filings 2026-27
Biomass	0.78	0.23
Bagasse	0.00	0.00
Municipal waste	91.69	257
Industrial waste	78.06	75
Wind	261.80	283
Mini hydel	0.22	0.37
Solar	6083.02	5,465
Solar (JNNSM Phase I)	119.80	107
Solar (NTPC)	858.66	770
Solar (SECI)	858.66	770
Solar (NTPC, NHPC CPSU) Tr-III 1545 MW	3316.56	3360
Solar (NTPC CPSU) Tr-I &II 1692 MW	3632.12	3258
SECI (ISTS Tr IX 1000 MW)	2146.64	1925
Additional RE Procurement	4784.00	255
Total	22232.01	16,526

Compared to their earlier filings as well as the quantum of availability approved by the Commission for the FY 2026-27 TGDISCOMs in their present filings reduced electricity availability from solar power plants. They have also reduced additional RE procurement. They have not provided any reasons for revising their estimates.

</td><td>

TGDISCOMs have projected the energy availability from Non-Conventional Energy (NCE) sources based on the contracted capacities of NCE generators including the ones that are expected to be commissioned in FY 2026-27. The estimated generation from these capacities has been arrived at by duly considering the historically observed generation patterns across various NCE sources.

In addition, the proposed solar capacity additions under the PM-KUSUM-A, PM Surya Ghar, and PM-KUSUM-C schemes have also been taken into account for estimation of Energy availability. The corresponding energy generation from these anticipated capacity additions has been included in Energy Availability by factoring in the expected commissioning timelines of the respective projects.

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S.No.	Summary of Objections / Suggestions	Response of the Licensee
10.	**Power procurement cost:** **Table 6: Power availability and procurement during FY 2026-27** (MU) • TGDISCOMs' power procurement plan for the FY 2026-27 shows that 21,774 MU available from various thermal power plants is not being procured. Nearly 20% of power available from TGGENCO thermal power plants is not going to be procured. More than 30% of power available from CGS thermal power plants is not going to be procured. Nearly 10% of power available from SEIL thermal power plants is not going to be procured. More than one-fourth of power available from Singareni thermal power plants is not going to be procured. • Even when substantial capacity of thermal power plants available to Telangana state are going to be backed down during the FY 2026-27 TGDISCOMs proposes to procure 11,641 MU through short-term purchases. These short-term purchases account for 11.41% of total power procurement planned.	TGDISCOMs would like to reiterate the fact that Energy procurement from short term sources is considered for the following reasons 1. Energy supply during hours of deficit (Power requirement > Power availability from generators). Despite having a total Energy surplus of 11,025 MUs, it is pertinent to note that there will be time blocks in the year when the instantaneous power requirement in the state is higher than the total generation capacity, pushing TGDISCOMs to procure the power deficit from short-term sources. Such instances of electricity deficit occur during Morning and evening peak hours when the Solar generation is not available. Hence, purchase from short term sources become inevitable with the current supply demand situation. 2. Power purchase cost optimization: TGDISCOMs have considered procurement from short term sources during hours when the Market price is lesser than the Variable cost (VC) of few generating stations with higher VC to optimize the overall cost of power procurement. It is clarified that the generation from TGGENCO, CGS, SEIL, SCCL plants are proposed to be backed down only during hours when market purchase is more economical in order to optimize the overall cost of the power purchase in the state. TGDISCOMs respectfully submit that we have estimated a total

Source	Availability	Procurement	Variation
GENCO Thermal	55,887	44,790	11,097 (19.86%)
GENCO Hydel	3,827	3,827	0
CGS	26,458	18,181	8,277 (31.28%)
NCES	16,526	16,526	0
SEIL	1,886	1,701	185 (9.81%)
Singareni	8,421	6,206	2,215 (26.30%)
Short-term purchase	---	11,641	
Short-term (sale)		(891)	
Total	1,13,006	1,01,981	

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	• Even if these short-term power purchases are not resorted to, still Telangana state will have surplus power of more than 10,000 MU during FY 2026-27. • TGDISCOMs in their present filings noted their proposal to purchase power from short term sources on need-to-need basis. As the State is facing surplus power situation there shall be no place for short-term power purchases. Following the power availability and power requirements estimated by TGDISCOMs during the FY 2026-27 the state will have surplus power of more than 10,000 MU, without taking into account power proposed to be procured from short-term sources. In such power surplus situation, there shall be no place for short-term power procurement. • Compared to the FY 2025-26 TGGENCO thermal power plants will be generating 16,932 MU additional power during the FY 2026-27. This power is expected to come from new Units (III, IV and V) of YTPS with aggregate generation capacity of 2,400 MW. At the same time TGDISCOMs propose to not to procure 21,774 MU available from various thermal power plants. This implies that these three new units of YTPS with aggregate capacity of 2,400 MW are not needed.	procurement of 3,346 MUs from Short term sources for supply during hours of power deficit and 8,295 MUs for Power procurement cost optimization. TGDISCOMs submit that, as elaborated in the preceding sections, the planning of tied-up capacity is undertaken after carefully assessing the State's base-load and peak-load requirements throughout the year, using demand–supply analyses at a granular 15-minute time-block level. The existing peak-load characteristics of the State, particularly their occurrence during non-solar hours, necessitate adequate thermal capacity to ensure reliable supply during such periods. Further, we would like to submit that the backing down of thermal

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	A fundamental question arises in this context: When these three new units of YTPS with aggregate capacity of 2,400 MW are not needed, is there need for another 2,400 MW capacity from NTPC's Telangana STPS Stage-II? • TGDISCOMs estimated the total power purchase cost to be Rs. 54,567 Crore during the FY 2026-27 compared to the Commission's estimate of Rs. 49,667 Crore. TGDISCOMs' estimate of power purchase cost is 9.87% higher than that of the Commission. • Net power purchase cost arrived at by TGDISCOMs as well as the Commission depends on revenue envisaged from sale of surplus power during the FY 2026-27. While TGDISCOMs projected sale of 2,985 MU of surplus power the Commission projected sale of 16,755 MU of surplus power. Hitherto experience with selling surplus power is not very encouraging. Inclusion of estimated revenue from sale of surplus power only helps to show lower power purchase cost burden which in turn leads to lower or no tariff hike and lower subsidy burden on the state government. But reality will catch up at the time of true-up.	stations does not arise solely from energy-surplus conditions. Backing down is also undertaken to optimize overall power-purchase costs whenever market prices are more economical compared to the variable cost of certain generating stations. The long-term projections of the State's base-load and peak-load patterns continue to justify the requirement for 2,400 MW of capacity from the YTPS units. We would also like to clarify that TGDISCOMs have proposed procurement of only 800 MW from the 3×800 MW NTPC Telangana STPS Stage-II project. We submit that, in estimating the power-purchase cost for FY 2026–27, a detailed block-level analysis of energy-surplus availability and prevailing Market prices has been undertaken for all time blocks across the year. Based on this assessment, the projection of surplus-power sales has been considered only for those blocks in which the Market price is higher than the Variable Cost (VC) of the generating stations, thereby ensuring that such transactions remain financially viable.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	• For the FY 2025-26, TGDISCOMs estimated the fixed costs of TGGENCO thermal units to be Rs. 8,492 Crore While the Commission approved Rs. 8,756 Crore towards the same. In case of FY 2026-27, TGDISCOMs projected fixed cost of TGGENCO thermal units to be Rs. 12,017 Crore. Substantial part of this increase in fixed costs during FY 2026-27 is due to YTPS. The Commission has not yet determined the capital cost of YTPS. Fixed costs of YTPS units shall be according to the Commission's Order on capital cost determination of YTPS. Fixed costs of YTPS units in operation shall only be taken in to account.	It shall be noted that three units (Unit-1, Unit-2 & Unit-4) of YTPS have already been commissioned. Further, the remaining two units are expected to be commissioned prior to the commencement of FY 2026–27, as communicated by TGGENCO vide letter dated 03.09.2025. In view of the above, all five units of YTPS are anticipated to be under commercial operation during FY 2026–27. Accordingly, it is considered appropriate to take into account the fixed costs pertaining to all five units of YTPS for the said financial year.
	• TGDISCOMs have projected higher fixed costs during the FY 2026-27 in the case of other thermal power plants of TGGENCO compared to these costs during FY 2025-26, though there is no change in generation capacities. In the case of BTPS fixed cost is projected to be Rs. 280 crore higher during FY 2026-27 compared to the estimated fixed cost during the FY 2025-26. With capital cost at more than Rs. 9 crore per MW. BTPS is the costliest coal based thermal power plant in the country. The operation of the plant until now has shown that it is beset with problems due	TGDISCOMs have projected the fixed cost for TGGENCO stations considering the additional capitalization of assets proposed by TGGENCO in their filings thereby resulting in higher Fixed costs in comparison with the previous years.

<table>
<tr><th>S.No.</th><th>Summary of Objections / Suggestions</th><th>Response of the Licensee</th></tr>
<tr><td></td><td>to substandard machinery/plant. Given this experience no more capital cost addition shall be allowed in the case of BTPS.

• Regarding fixed costs of central generating stations (CGS) TGDISCOMs submitted as follows, “For FY 2026-27, the Licensee has considered the 3% escalation on the Fixed Costs incurred on full year projections of FY 2025-26 based on actual fixed cost of first half (Apr'25 to Sep'25) of FY 2025-26.” TGDISCOMs have not provided rationale for adopting this procedure.

• In the case of SEIL and Singareni thermal power plant also TGGDISCOMs adopted similar approach of escalation current years fixed cost by 3%. As they have not provided any rationale for this same shall be rejected.</td><td>TGDISCOMs have considered a 3% escalation in the Fixed cost of Central Generating stations (CGS) in order to account for the expected increase in the cost in FY 2026-27.

TGDISCOMs have considered a 3% escalation in the Fixed cost of SCCL and Singareni in order to account for the expected increase in the cost in FY 2026-27.</td></tr>
<tr><td>11.</td><td>In the case of Singareni thermal power plant different fixed cost figures are provided at different places:
Table 7: Fixed cost of Singareni thermal power plant<table><tr><th>Particulars</th><th>2025-26 (Rs. in Cr)</th><th>2026-27 (Rs. in Cr)</th></tr><tr><td>Narrative part*</td><td>1326.43</td><td>1319</td></tr><tr><td>Power purchase cost summary**</td><td>1440</td><td>1379.80</td></tr><tr><td colspan="3">* TGSPDCL ARR, p.51
** TGNPDCL ARR, p. vi and vii; TGSPDCL ARR, p.54</td></tr></table>This discrepancy needs to be clarified.</td><td>It is hereby clarified that TGDISCOMs have considered 3% escalation on the Fixed cost on full year projections of FY 2025-26 based on the Fixed cost incurred in the first half of FY 2025-26. The fixed cost projected for Singareni thermal power plant is as follows.<table><tr><th></th><th>FY 2025-26</th><th>FY 2026-27</th></tr><tr><td>Fixed cost Singareni thermal (Crs)</td><td>1,340</td><td>1,380</td></tr></table></td></tr>
</table>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
12.	• There is wide variation in projected variable costs of different plants of TGGENCO thermal plants. Except YTPS all other thermal plants are located near coal mines. At one end is Kakatiya TPP-II with variable cost of Rs. 2.74 per unit, at another end is Kothagudem-VI with variable cost of Rs. 3.85 per unit. As all these plants are located in similar geographical conditions their wide variation in variable cost is puzzling. • Projected variable costs of different plants of TGGENCO thermal plants in the FY 2026-27 are lower than actual variable costs reported for the FY 2024-25. • Variable cost of Singareni thermal power plant (Rs. 3.46 per unit) is higher than TGGENCO's Kakatiya TPP-II (Rs. 2.74 per unit). • Variable cost of NTPC's Ramagundam I & II (Rs. 4.52 per unit) and Ramagundam-III (Rs. 4.45 per unit) is higher than TGGENCO's Kakatiya TPP-II (Rs. 2.74 per unit) though they are located in similar geographical conditions.	TGDISCOMs would like to bring to notice that irrespective of having similar geographical proximity from coal mines, different generators have different Station Heat Rates (SHR) and other operating parameters leading to difference in variable costs The projections on the Variable cost (VC) of TGGENCO thermal stations has been done also considering the impact of variable cost reduction due to coal cost reduction by M/s Singareni Collieries company and the impact of changes in GST increase from 5% to 18% and abolition of Rs.400 Compensation CESS. The above has resulted in lesser VC projections for TGGENCO stations in comparison with the actual VC in FY 2024-25.
13.	TGDISCOMs propose to procure 11,641 MU of electricity through shot-term purchases at Rs. 3.45 per unit. This unit cost is higher than variable cost of several thermal power plants available to Telangana state which sought to be	TGDISCOMs would like to reiterate the fact that Energy procurement from short term sources is considered for the following reasons 1. Energy supply during hours of deficit (Power requirement >

<table>
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<tr><td></td><td>backed down to facilitate short-term power procurement.
We request the Commission not to allow short-term power procurement by TGDISCOMs.</td><td>Power availability from generators)
2. Power purchase cost optimization: TGDISCOMs have considered procurement from short term sources during hours when the Market price is lesser than the Variable cost (VC) of few generating stations with higher VC to optimize the overall cost of power procurement.
To further detail the above, 3,346 MUs Electricity for supply during deficit hours is projected to be procured from short-term sources at ~Rs.4.99/unit and 8,295 MUs Electricity for Power purchase optimization is projected to be procured during hours of low market prices at Rs. 2.81 per unit. This leads to an overall procurement cost of ~Rs.3.43/unit from for the total 11,641 MUs to be purchased from short term sources. Here, it is pertinent to note that, the procurement from short term sources for deficit supply is done only when the entire generation capacity is dispatched and the procurement from short term sources for Power purchase optimization is done only by backing down the thermal generators having higher VC than the then existing market (Short term source) prices resulting only in the reduction of overall power procurement cost.</td></tr>
<tr><td>14.</td><td>Table 8: T&D Costs f TGDISCOMs for FY 2026-27 (Rs. in Cr)
<table><tr><th rowspan="2">Expenditure</th><th colspan="2">NPDCL</th><th colspan="2">SPDCL</th></tr><tr><th>Filings</th><th>Approved</th><th>Filings</th><th>Approved</th></tr><tr><td>Transmission cost</td><td>1,726</td><td>1,795.83</td><td>4,133</td><td>4,302.05</td></tr><tr><td>Distribution cost</td><td>4,953</td><td>4,058.86</td><td>7,616</td><td>6,053.99</td></tr></table>
• The Commission had issued the Retail Supply Tariff</td><td></td></tr>
</table>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	Order for FY 2024-25 and ARR for each year of the 5th control period on 28th October 2024. In that order the Commission had approved ARR for each year of the 5th control period. TGDISCOMs in their present filings have claimed that in accordance to the regulation and above Order of the Commission the DISCOMs have computed the ARR for FY 2026-27. But there is wide variation between the ARR approved by the Commission for the FY 2026-27 as a part of 5th Control Period and the present filings by the TGDISCOMs. In the case of all expenditure items except transmission cost DISCOMs have shown higher expenditure compared to that approved by the Commission through the above MYT Order. At the same time TGDISCOMs did not provide reasons for the variations in expenditure. • In the case of TGNPDCL while the Commission had approved Rs. 4,058.86 crore towards distribution cost the DISCOM is claiming Rs. 4,953 crore which is higher by Rs. 894 crore (22% higher). Similarly, in the case of TGSPDCL while the Commission had approved Rs. 6,053.99 crore towards distribution cost the DISCOM is claiming Rs. 7,616 crore which is higher by Rs. 1,562 crore (25.80% higher). Given this	TGSPDCL respectfully submits that there is no violation of the MYT principle under TSERC (Multi-Year Tariff) Regulation, 2023 (Regulation No. 2 of 2023). In accordance with clause 6.2 of Regulation 2 of 2023 requires the distribution licensee to file, for every year after the first year of the Control Period, an annual petition containing the true-up of the previous year and the revised Aggregate Revenue Requirement (ARR) for the ensuing year, along with the revised tariff and charges. Further, the MYT framework mandates that the Commission shall determine the ARR and tariff for each year of the Control Period separately, and also provides for the treatment of controllable and uncontrollable variables. The ARR approved in the original MYT Order serves only as a baseline projection, and the Regulation does not freeze the ARR; instead, it anticipates annual updates based on actual capitalization, O&M norms, true-up impacts, and other permissible adjustments. Hence, the proposed ARR does not contravene the MYT Order nor undermine regulatory consistency, as it has been filed strictly in accordance with the provisions of Regulation No. 2 of 2023. The reduction in Transmission cost claimed than approved in MYT order is by considering the APR of TGTRANSCO for FY2024-25. The increase in the Distribution cost of TGSPDCL is by considering the additional capex for the proposed conversion of OH line to UG cabling in metro area of Hyderabad in the 1st phase. It is humbly submitted that TGDISCOMs have estimated the Annual

<table>
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<tr><td></td><td>wide deviation TGDISCOMs' claims related to distribution cost for the year 2025-26 shall be thoroughly scrutinized.

• Net result of this is that TGDISCOMs have arrived at higher ARR compared to the ones approved by the Commission. Given this deviation from the ARR approved by the Commission DISCOMs' claims on ARR for the FY 2026-27 needs to be subjected to thorough scrutiny. This is particularly important because TGDISCOMs did not provide justification for higher expenditure over and above the limit set by the Commission.</td><td>Revenue requirement involving prudence in the estimation of Revenue and cost. The Hon'ble commission is requested to review the same.</td></tr>
<tr><td>15.</td><td>Electrical Accidents:
Table 9: Fatal electrical accidents<table><tr><th rowspan="2">Particulars</th><th colspan="2">2024-25</th><th colspan="2">2025-26 H1</th></tr><tr><th>NPDCL</th><th>SPDCL</th><th>NPDCL</th><th>SPDCL</th></tr><tr><td>General public No.</td><td>377</td><td>97</td><td>158</td><td>131</td></tr><tr><td>Ex-gratia No.</td><td>388</td><td>138</td><td>124</td><td>382</td></tr><tr><td>Ex-gratia Paid Rs. Cr</td><td>19.90</td><td>6.74</td><td>6.40</td><td>18.99</td></tr><tr><td>Compensation to Animals Rs. Cr</td><td>3.83</td><td>1.01</td><td>1.14</td><td>4.23</td></tr></table>• During the FY 2024-25, 474 fatal electrical accidents involving humans had taken place in the State. During the first half of FY 2025-26 the number of such fatal accidents stands at 289. These numbers show that there was no let up in occurrence of fatal electrical accidents in the State. Directives issued by the</td><td>In compliance with the Commission's directive, TGSPDCL has submitted the Electrical Accidents and Ex-gratia Report with complete details for FY 2024-25 to Hon'ble Commission. TGSPDCL requests the Hon'ble Commission to consider the amounts claimed and submitted as per the filings.</td></tr>
</table>

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	Commission to the TGDISCOMs to take steps to bring down the number of these fatal electric accidents do not seem to have much impact. • As a part of its response to the Commission's directive related to electrical accidents TGNPDCL provided causes for electrical accidents that have taken place during FY 2025-26. These causes are divided in to accidents for which consumers/external factors are responsible and for which department is responsible. Following are some of the causes for which consumers/external factors are held responsible: **Table 10: Causes for electrical accidents** **Accidents Taken place with Consumer side fault or external factors** / **No. of accidents** Victim came in to Contact with live Conductor (with or without any object) — 56 While replacing HG fuses or LT Fuses of DTR / PTR or Touching the Fuse Box @ DTR — 14 While working on existing line for maintenance / Construction of New Line — 14 Pole damaged and fell down due to Heavy gale and wind — 3 Touched the Sagged/Snapped / fallen conductor due to Gale & Wind — 3 Touching the Snapped and fallen conductor — 10 Total — 100 • People come in to contact with live conductors because they are sagging. It is the responsibility of the DISCOMs to see that conductors are in good condition. Consumers try to replace fuses of DTRS because DISCOM personnel do not respond to the complaints in time forcing the consumers to take risk. It is the responsibility of the DISCOM to repair	TGDISCOMs ensure compliance of safe practices during Installation, Operation & Maintenance of distribution infrastructure keeping public safety as utmost priority. In addition, TGDISCOMs have initiated programs such as Praja Bata to address consumers concerns on areas including Electrical safety and improving consumer awareness. Free Dial number 1912 facility is created to lodge any supply related

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	damaged poles and conductors in time to avoid accidents. All the above 100 accidents shall fall in the DISCOM account. Consumers shall not be held responsible for these accidents.	complaints by the consumers which will be processed and rectification action will be taken in short times.
	• TGSPDCL responded to this directive as follows, "The report on Electrical Accidents and Ex-gratia shall be submitted to the Hon'ble Commission."	
	• As a part of the Distribution Business true up for the year 2024-25 TGNPDCL claimed Rs. 25.14 Crore towards compensation/ex-gratia paid to electrical accidents. In the filings related to ARR and RST Proposals for FY 2026-27 TGNPDCL recorded that Rs. 23.73 Crore expenditure was incurred during FY 2024-25 towards compensation/ex-gratia paid to electrical accidents. Similarly, TGSPDCL claimed Rs. 20.18 Crore, as a part of the Distribution Business true up for the year 2024-25, towards compensation/ex-gratia paid to electrical accidents. In the filings related to ARR and RST Proposals for FY 2026-27 TGSPDCL recorded that Rs. 7.75 Crore expenditure was incurred during FY 2024-25 towards compensation/ex-gratia paid to electrical accidents. There is discrepancy in the amounts claimed by TGDISCOMs towards compensation/ex-gratia paid to electrical accidents	As per the filings of TGSPDCL related to ARR and RST Proposals for FY 2026-27, the expenditure of Rs. 7.75 Crore incurred during FY 2024-25 towards compensation/ex-gratia paid to electrical accidents shown only for H1 of FY2024-25. For entire FY2024-25, TGSPDCL claimed Rs. 20.18 crore, towards compensation/ex-gratia paid to electrical accidents as part of the Distribution Business true up for the year 2024-25. There is discrepancy in the amounts claimed by TGDISCOMs towards compensation/ex-gratia paid to electrical accidents during FY 2024-25.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	during FY 2024-25. This needs to be verified. • The information provided by TSDISOMs on electrical accidents show that most of the fatal accidents took place in circles with predominantly rural services. These accidents are low in urban circles. This implies that the rural consumers are not receiving quality service. Every step shall be taken to correct this anomaly.	
16.	Arrears: • According to TGNPDCL filings of FY 2026-27 total arrears of Rs. 50,000 and more pending for six months as on 30-09-2025 are Rs. 17,968.45 crore. These arrears are higher than ARR approved by the Commission for FY 2025-26. According to TGSPDCL filings of FY 2026-27 total arrears of Rs. 50,000 and more pending for six months as on 30-09-2024 are Rs. 2, 418.68 crore. These arrears are equal to 5.88% of ARR approved by the Commission for FY 2025-26. Compared to the previous year TGSPDCL has reduced the arrears substantially. Substantial portion of these arrears have to come from state government departments. (While TGSPDCL mentioned the arrears due from Government departments, TGNPDCL did not show these details. TGNPDCL provided circle wise	It is submitted that both DISCOMs have been consistently taking focused steps for arrears reduction through sustained monitoring, intensified collection drives, disconnection of defaulting consumers as per the Electricity Act, 2003 and Supply Code provisions, and periodic engagement with large consumers. As rightly noted by the objector, TGSPDCL has achieved a substantial reduction in arrears compared to the previous year, reflecting the effectiveness of these measures. With regard to TGSPDCL, the arrears pertains to State Government departments, amounting to ₹1,543.06 crore (63.8%), the DISCOM has been regularly pursuing the concerned Government departments through institutional mechanisms and periodic reconciliations. Regarding the reference to Clause 1.2(i) of the UDAY MoU stipulating clearance of Government department dues by 31-03-2017, it is submitted that while the DISCOMs have been continuously flagging the issue at appropriate levels, the clearance of such dues depends on

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	information). According to TGSPDCL submission arrears due from state government departments stand at Rs. 1,543.06 crore accounting for 63.8% of the arrears. Situation may be the same or even worse in the case of TGNPDCL. In the case of TGNPDCL 99% of the arrears are due from HT consumers. According to Section 1.2 i) of UDAY – MoU all outstanding dues from the government departments to DISCOMs for supply of electricity shall be paid by 31-03-2017. Since then, arrears from state government departments in fact have increased. • If the arrears below Rs. 50,000 are also taken in to account total arrears due to TGDISCOMs will be much higher. Because of these mounting arrears TGDISCOMs are forced in to heavy debt burden and it is one of the reasons for losses incurred by the TGDISCOMs.	budgetary allocations and policy decisions of the State Government. Non-realisation of these amounts cannot be construed as a lapse on the part of the DISCOMs, particularly when supply to essential Government services cannot be abruptly discontinued. It is therefore submitted that arrears from Government departments are a systemic issue, being addressed through coordinated efforts with the State Government, and the same should not be viewed as inefficiency in DISCOM operations. The demonstrated improvement in arrears position, especially in the case of TGSPDCL, clearly establishes the DISCOMs' commitment to financial discipline and revenue recovery.

7. Response to Mr. Vijay Rathod, Chief Project & Engineering Officer, GMR Hyderabad International Airport Ltd.,

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	Request for revision of GMR Airport's Tariff at 132KV level and from existing ratio of Aviation to Non-Aviation loads from 61:39% to 80:20% ratio. Hon'ble APTEL in Appeal No. 12 of 2011 held that if it is not feasible to have separate metering arrangements for the aviation activities and purely commercial activities, then the State Commission could re-categorize the Appellant in a separate category other than HT commercial II and determine the composite tariff for aviation and the commercial activities of the Appellant. For the Tariff Year 2012-13, in pursuance of the Hon'ble APTEL's order in Appeal No. 12 of 2011, considering the challenges involved in segregation of aviation and non-aviation loads, Hon'ble State Commission created a new category for Airports by considering a composite tariff with aviation load at 61% and the non-aviation loads at 39% ratio. Since the major non-aviation loads have been segregated from the aviation network in compliance to the directives of Hon'ble State Commission, resultantly, the load pattern ratios for the existing airport activities at GMR Airport for have changed as per table provided herein below:	The petitioner's reliance on internal load data and presentations dated 13.05.2022 and 10.10.2024 to claim an aviation load ratio of 80% is selective and self-serving. Such data has neither been subjected to independent verification nor approved by the Commission. Tariff determination cannot be based merely on representations or internal computations furnished by the consumer, especially when separate metering and segregation are feasible and have in fact been implemented. It is further submitted that tariff categorisation and applicable load ratios are matters of **regulatory determination**, to be decided by the Hon'ble Commission after a detailed prudence check and stakeholder consultation. The petitioner cannot seek automatic revision of approved ratios merely on the ground that internal consumption patterns have changed. Moreover, allowing revision of the Aviation to Non-Aviation ratio to 80:20 would result in **cross-subsidy distortion** and unjustified tariff benefit to non-aviation commercial activities, which are otherwise required to be billed under applicable commercial / HT categories. Such an approach would be contrary to the principles of cost reflectivity and non-discrimination enshrined under the Electricity Act, 2003. It is also pertinent to submit that HT-III tariff at 132 kV level and above is

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	<table><tr><th>Sl No</th><th>Type of Load</th><th>Before Load Segregation</th><th>After Non-Aviation Load Segregation</th></tr><tr><td>1</td><td>Aviation</td><td>61%</td><td>80%</td></tr><tr><td>2</td><td>Non-Aviation</td><td>39%</td><td>20%</td></tr></table> Vide our representations dated 13.05.2022 and 10.10.2024, we requested Hon'ble State Commission and TGSPDCL to consider revising the HT-III tariff (132KV Level and above) by computing the aviation load at 80% and non-aviation load at 20%. (Annex 1 & 2) We are enclosing the details of aviation and non activities on the airport load, which evidence the ratio of 80% of aviation load and 20% of non-aviation loads. (Annex: 3). We therefore humbly request the Hon'ble Commission to revise the HT-III tariff for Airport (132KV level and above) as per the revised the load ratios.	determined based on system cost, voltage-wise network usage and cross-subsidy considerations. Any modification to the tariff structure or load ratios has system-wide implications and cannot be considered in isolation for a single consumer.
2.	We understand from the Hon'ble Commission's order dt 15.11.2025, on removal of TOD tariff incentive for the night duration (from 22:00 hrs to 06:00 hrs) was based on the DISCOM's submissions that the day time power procurement cost as is cheaper than that of the night time power procurement cost. The said order was made applicable for the period from 1 Dec 2025 to 31 March 2026. Now TGSPDCL is proposing to continue the same ToD tariff structure removing the incentive for night time operations. In this regard, we would like to take reference to the	TGDISCOMs submit that the removal of TOD incentive during the night hours (22:00 hrs to 06:00 hrs) was based on the higher per-unit power procurement cost during this period compared to other time blocks. Continuation of incentives during these hours would impose additional financial burden on the Licensee, which would ultimately be passed on to consumers through tariff adjustments.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	Electricity (Rights of Consumers) Amendment Rules, 2023 issued by Government of India, wherein it is clearly mentioned that "tariff for solar hours of the day, specified by the State Commission shall be at least twenty percent less than the normal tariff for that category of consumers". We therefore humbly request the Hon'ble State Commission to introduce the incentive of INR 1.50/- per unit during the solar availability period (ie from 10 am to 6pm) in terms of Electricity (Rights of Consumers) Amendment Rules, 2023 or retain the earlier mechanism of night incentive of Rs. 1.50/- for the period from 22:00 hrs to 06:00 hrs.	
3.	We therefore humbly request the Hon'ble Commission to advise TSSPDCL to carry out Load Assessment Study for Aviation Service as the major non-aviation loads have been segregated and submit the cost of service to the Hon'ble Commission for finalizing HT-III Tariff.	Segregation of certain non-aviation loads does not alter the fundamental network usage characteristics, demand pattern, or cost drivers applicable to HT-III consumers. Any separate cost of service study for a sub-set of consumers within an existing tariff category would lead to unwarranted tariff fragmentation and regulatory complexity. TGSPDCL therefore submits that the existing HT-III tariff, as approved by the Hon’ble Commission, adequately reflects the cost of service, and no separate Load Assessment Study or tariff finalization exercise for Aviation Service is required.

8. Response to Mr. PV Subba Reddy

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	When a farmer applies for an AGL connection, he is told that neighboring farmers are not allowed to lay the ltne, so he is not given a connection, and is told that he should talk to that neighboring farmer himself It is requested that the department to take up this responsibility. In such instances the poles should be laid along the roads and boundaries, not in the middle of the field. Several DTRs are in the midst of crops, cultivating land, is prone for accidents. Such DTRs to be relocated sumoto without request of farmers.	TGDISCOMs respectfully submits that agricultural connections are released in accordance with prescribed SOPs. Wherever feasible, HT/LT lines and DTRs are routed along existing roads or field boundaries, to avoid inconvenience to farmers. The right of way for erection of poles for release of new connection is under the scope of applicant only. Shifting of DTRs will be considered as per the SOPs.
2.	Safety measures and network upgradation is at snail pace, snapped wires, Lack of AB switch, low hanging cables Is a common scene.	Regularly the defects (loose lines, leaned poles, low transformer plinths etc.,) noticed in the existing distribution network of 33KV, 11KV and LT lines are being rectifying and every care is being taken to provide reliable, quality and un-interrupted power supply to Agriculture sector.
3.	Hon commission amended regulation of ORC. consumers are issued estimates, but pending for payment. Request to include under modified regulation.	Only the applications recived from the date of effect of modified Regulation will be processed under new Regulation.
4.	The huge number of petitions filed in response to ARR, Cgrfs as well customer service centers are testimony for	The licensee achieved the overall SOP. Quarterly SOP reports are being submitted to Hon'ble commission.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	violation of SOP Standard's	
5.	While laying electricity towers and lines farmers or general public do not receive any prior information, nor the utilities such as their consent before entering the fields which belongs to electricity is being supplied from 11 kV to 765 kV. Electricity poles are being planted with a radius of 12 inches and extending up to half an acre, starting from the supports. On such poles, electricity floor ws from 11 kV to 133, 220, 440 and 765 kV lines. Due to the flow, there is a possibility of its adverse effect on the crops grown in the vicinity of those lines, resulting in low crop yields. Its adverse effect on the livestock of the farmer, especially on pregnant animals, is more and the livestock is also lost. When farmers are working in their fields, women farmers, including pregnant women and men, are working for hours and are falling ill due to the effects of electric cycles and are suffering from diseases like cancer. Farmers are deprived of their livelihood, loss of crop and possible health problems while laying a transmission line and possibly towers in their land often access to land owned by them is restricted loss of economic value for their land due to laying of electric line in between their fields, the financial capacity of Small and marginal farmers are more severely affected. Prior consent is not being taken before laying of power	TGDISCOMs respectfully submits that laying of distribution infrastructure is carried out strictly in accordance with SOP guidelines, with due regard to public safety. Wherever required, prior intimation and compensation are being provided. The area occupied for poles or towers is kept within approved safety limits, and farmers are generally allowed to continue cultivation with due safety precautions. TGDISCOMs remains committed to protecting farmer interests, ensuring safety of people and livestock, and addressing grievances through established mechanisms, while also ensuring reliable power supply for public benefit.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	lines. Compensation is not paid adequately and thus to redress their grievances are limited for the farmers, except to approach courts. The major problem is the area being taken only limited to four legs of the tower pylon structure. The farmer cannot cultivate either with bullocks or tractor 5 meters radius, apart the tower all round being dangerous zone while carrying out Agri operations. So the total area to be compensated should be increased. Compensation towards diminution of land value in the width of Right of way row corridor due to laying of lines should be 100% of land value as per market rate and applicable under Land Acquisition Act 2013 or on lease permanently which has to be paid half yearly in September- October and March, April annually. The authorities are not adhering to the laid down rules, regulations for land acquisition, ROW. violations to be treated as cognizable offensive. Necessary rules, regulations, protocols to be defined and ensured for compliance. The above procedure of following guidelines should be strictly adhered to and responsibility to be fixed on supervisory authority of not less than Superintendent Engineer. Their deviation should attract criminal proceedings denying or ignoring poor farmers as they are	

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	unaware of their right which gives scope to once ride them and cash their igorance of their rights. Police or any officials should not interfere nor threaten the farmers. In future as the Private Sector may come into the field as a player we have to be careful in strictly implementing for the benefit of farmer.	
6.	Status of implementation of directives	Status of Implementation of Directives is furnished as part of ARR Filings.
7.	Efforts to improve internal efficiency for gap in ACS and ARR are also not filed Reg govt dues the reply is routine. Hon commission is requested to direct to provide for provision as per accounting norms	TGDISCOMs submits that continuous efforts are being made to reduce ACS-ARR gap. TGDISCOMs are actively pursuing clearance of outstanding electricity dues from the Government of Telangana, which is required for participation in the RDSS scheme, and proposals have also been submitted to the Ministry of Power, Government of India. In parallel, TGDISCOMs are regularly conducting consumer awareness programs and wide publicity through newspapers to promote energy conservation, use of LED lighting and star-rated appliances, which together contribute to improving efficiency and reducing ACS–ARR gap over time.
8.	Loss reduction measures given only by circles and head office is required to file comprehensive report.	Head office furnished Loss-reduction measures being implemented at area specific for more clarity.
9.	Energy audit quarterly not made available.	It is submitted that the quarterly energy audit reports are being regularly hosted on the official website of the DISCOM and are accessible in the public domain.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
10.	Segregation of commercial and avian activity GMR airport is not complied.	Subsequent to the directions of TGSPDCL, GHIAL has completed segregation of major non-aviation and aviation loads at source level. All major non-aviation loads have been shifted to the new HT services in the presence of TGSPDCL officials, while residual minor non-aviation loads that are not technically feasible for segregation at source level are being metered at consumption level and billed at applicable tariffs.
11.	Notice for compliance for power factor is not implemented	TGDISCOMs have issued notices to applicable consumers to maintain the power factor close to unity by controlling reactive power at the load end, rather than at the system level, so as to avoid stress on the network and potential adverse impacts.
12.	DTR replacement is done only after breakdown.	All major materials such as DTRs, conductors, AB Switches are maintained as per field requirement. DTR replacement is undertaken based on both field assessments and breakdowns.
13.	3rd DISCOM formation is not taken in to consideration in filings	The formation of the 3rd DISCOM involves completion of prescribed statutory and administrative procedures, including approval of the licensee, bifurcation of assets and liabilities, and fulfillment of other due processes, and upon completion of these requirements, the same will be duly considered in the subsequent filings.
14.	The employee costs are more by 15 % than approved. All segments of distribution are higher than approved by Commission. The Justification by facts or given instead reason that commission approved lower is untenable.	The Hon'ble Commission has approved O&M expenses by applying escalation on the average of the true-up expenses for the immediate preceding control period, and this if further escalated for 3 years as per clause No. 81 of Regulation No. 2 of 2023. However, the approved amount so derived is lower than the actual expenditure incurred during

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		FY 2023-24. O&M cost escalation is based on CPI/WPI indices in accordance with Regulation 81.3 based on actuals for FY 2024-25. This revision is primarily on account of actual employee cost, repairs & maintenance activities, and administrative expenses, projected based on CPI/WPI. The Hon'ble Commission has approved Employee cost for FY 2024-25 by applying escalation on the average of the true-up expenses for the immediate preceding control period, and this if further escalated for 3 years as per clause No. 81 of Regulation No. 2 of 2023. However, the approved amount so derived is lower than the actual expenditure incurred during FY 2023-24. The revised O&M expenses projected for FY 2026-27 is computed based on actual costs and inflation. We request the Commission to consider these variations as we have filed our submission in accordance with MYT Regulations, 2023 (2 of 2023).
15.	• SPDCL balance sheet as of 31/3/24 accumulated losses are 40,380 CT against paidup capital of Rs.12017 cry only with huge 28362 Chr negative net worth. • Even considering the short.long term borrowings and capital ,still the accumulated losses are more. The interest burden on short term increased 808 Crs suggests prudent management of borrowings In view of the precarious financials of discoms, the companies are	TGDISCOMs submits that, in order to reduce the financing cost burden, DISCOMs are actively engaging with lenders to renegotiate existing loan terms, including seeking reduction in interest rates, and exploring restructuring options wherever feasible, with the objective of lowering the overall cost of debt. These efforts are ongoing to ensure that the interest burden on consumers is minimized and the financing structure becomes more sustainable. In case of any reduction in interest rates achieved through these negotiations or restructuring will be fully reflected and claimed appropriately during the True-up.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	not financially viable entities to carry on the huge essential public utility services. Structural financial crisis due to high purchase cost, subsidy burden	
16.	The data on accidents, month wise also not submitted. The accidents are on the rise and precious lives are lost case wise reasons are to be provided.	Our claim includes (a) statutory and ex-gratia payments arising from force-majeure/public safety events not attributable to the utility; and (b) amounts mandated under lawful directions where no fault of the licensee is established. According to the guidelines of the Hon'ble Commission of Proceedings No. TSERC/Secy/86 of 2015, Dt:28-12-2015, para no.3 is extracted as below. *"After careful consideration of the information submitted and issues raised by the DISCOMs, the Commission hereby enhances the ex-gratia sum payable, as a safety measure, in the case of a fatal accident resulting in death of a non-departmental person and / or of an animal owing to electrocution and other issues connected therewith are dealt hereunder."* Therefore, TGDISCOMs are paying the compensation/ex-gratia amount to every Electrical accident to non-departmental person and / or of an animal with Department fault or without Department fault in every year and this expenditure is booked under compensations account under A&G expenses in the licensee books of accounts. The details of case-by-case cause of accident and the payments made against each case are already submitted to the Hon'ble Commission.
17.	• Demand growth is significant pressure on infra and costs. • Requires capex expediency.	TGDISCOMs submits that the strong demand growth places significant load on existing network assets, requiring timely and targeted capital investment to maintain reliability, safety, and supply quality. The proposed capex is therefore essential and not discretionary, aimed at strengthening substations, feeders, and network capacity to meet rising

S.No.	Summary of Objections / Suggestions	Response of the Licensee
		peak demand and avoid overloads or service disruptions. In case of TGSPDCL, the additional capex primarily pertains to Underground cabling works, SCADA expansion and automation, New substations and capacity augmentation, required to meet summer peak loads and to address loading of existing transformers and feeders. The UG cabling works were not envisaged at the time of filing the MYT Petition due to evolving demand patterns, accelerated urbanisation, and emergent reliability issues.

9. Response to ITC Limited, Paperboard & Specialty Papers Division

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	2. The captive generation of electricity at the Objector's aforesaid plant is by the cogeneration process whereby heat energy used for pulp cooking, humidification, and drying is produced along with electricity. The said plant presently has seven T-G Sets of varying capacities aggregating to about 260.187 MVA. Four TG-Sets of 95.5 MVA is kept as a stand-by. The TG-sets and the loads are segregated into two networks internally, with 88 MVA in one network and 76.687 MVA in another network. Under normal operation, the TG-Sets are operated in island mode and the entire load is met exclusively from the TG-sets, no power being consumed from TGNPDCL. The Consumer Service with TGNPDCL is presently with a CMD of 15MVA at 132 kV. Power is drawn from TGNPDCL within the CMD of 15 MVA partly for start-up purposes of the TG-sets and partly as standby power. The starting currents of motors during start-up is minimised by soft start arrangements. The power drawn during start-ups is always well within the CMD of 15 MVA. The said plant also receives and consumes power from its wind energy plant in Andhra Pradesh through inter-state	The Objector claim that it does not avail any grid support is not tenable because it maintains a live 132 kV grid interconnection with a CMD of 15 MVA and routinely relies on the grid for start-up, stand-by, and open-access import operations. Even if its TG sets generally operate in island mode with internal interlocks, the grid must remain continuously available to provide voltage and frequency reference, system strength and fault level, protection coordination, and back-up clearing capability at the point of interconnection. These services impose real obligations and costs on the licensee regardless of whether actual load transfer occurs during contingencies. Compliance with harmonic limits or internal protection schemes does not negate the need for the grid to maintain required reliability and protection standards for a connected consumer. Therefore, the assertion that "no grid support is actually availed" is incorrect; the Objector's own operational arrangement establishes dependence on the grid. Accordingly, the levy of grid support charges remains justified, and the objection does not warrant any deviation.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	open access. Under normal operation, the connection with the grid is only to enable import of the energy under open access. At such times, only one of the networks is connected to the grid. There are electrical inter-locks in place to ensure that the connected loads trip whenever there is a tripping of the TG-Sets. Therefore, there is no transfer of load to the grid in the event of TG-Set failure or shut down. Mandatory protection arrangements are in place to clear internal faults within the time prescribed in the Grid Code. In the normal operation of ITC's continuous process plant, there are no equipment which impose intermittent or transient loads. There is no harmonic injection from ITC's plant in excess of permissible limits. Therefore, there is no circumstance by which it can be considered that any grid support is actually availed by ITC. The connection to the grid is utilised only for startup power or stand-by within the CMD with TGNPDCL or for import of open access power.	
2.	TGNPDCL and TGSPDCL have proposed levy of grid support charges ("GSC") for the FY 2026-27 at the rate of Rs. 18.50 Rs/kW/Month X (total installed capacity of the generators connected to the Grid – OA capacity or the PPA capacity if any with the DISCOMS). The proposal of GSC is unreasonable and is being challenged herein both	The Hon'ble Commission has determined the GSC as per the technical committee report of the Grid Coordination Committee duly considering the objections of the members of the committee towards the end of the Financial Year 2023-24 and directed the Licensees to file the proposals afresh for FY 2024-25. Therefore, based on the directions of the Hon'ble Commission, the DISCOMs have proposed the Grid Support Charges.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	in respect of the levy itself as well as the quantum. The proposal of GSC is wholly misconveived and without any proper understanding or consideration of the concept of grid support/parallel operation as explained hereinafter.	The licensee has computed Grid Support charges as per the methodology approved by Hon'ble Commission vide order O. P. Nos. 80 & 81 of 2022 dated 27.03.2024. The excerpt of the clause 4.1.13 is shown below *"At this stage, when the Retail Supply Tariffs are already fixed for FY 2023-24 and the Financial Year is at the fag end, the commission is not willing to determine GSC for FY 2023-24 and directs TSDISCOMs to file a separate petition for determination of GSC for FY 2024-25 onwards duly following the methodology approved in this order"* Hence, the licensee has adopted the methodology approved in the above order for computation of Grid Support Charges for FY 2026-27.
3.	Classification of Captive Power Plants (CPPs) operating in parallel with the grid Sl. No. 4	The Objector's classification of CPPs into multiple categories to argue selective non-applicability of Grid Support Charges (GSC) is misplaced. Any CPP that remains synchronized or interconnected with the grid—whether for start-up, stand-by, export, import, wheeling, or RPPO compliance—necessarily depends on the grid for system strength, voltage and frequency reference, protection coordination, fault-level support, and reliable operation at the point of common coupling. These technical requirements exist irrespective of the quantum of actual drawal or whether the CPP exports or operates in island mode during normal operation.
4.	• Fallacies in the premises and assumptions of Discoms in seeking to justify GSC. **Para 5 to 9**.	The objections raised from paragraphs 5 to 32 are based on incorrect premises and unfounded assumptions about the nature, extent, and applicability of Grid Support Charges (GSC). The Objector's attempt to differentiate CPPs,

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	• Need for Evolution of Criteria to determine when and to what extent grid support may be considered to have been availed. **Para 10 to 12** • Open Access Source vs CPP source of power **Para 13 & 14** • Non Co-located CPPs and Merchant/Independent Power plants **Para 15** • Roof-top Solar generation **Para 16 to 18** • Quantification of Grid Support Charge as proposed by Discoms **Para 19** • Earlier reports of Grid Co-ordination Committee on Grid Support Charges are seriously faulty, insufficient and based on non-consideration of relevant industries besides being in violation of principles of natural justice **Para 24 to 31** • Need for separate proceeding on the issue of GSC **Para 32**	open-access sources, rooftop solar, merchant plants, or non-co-located generators does not alter this underlying technical and regulatory reality. The suggestion that GSC requires a fresh "evolution of criteria" ignores the established jurisprudence and cost-of-service framework under which parallel operation and grid synchronisation are recognised as imposing system-level obligations on the licensee. Likewise, contentions regarding earlier technical committee reports, alleged non-consideration of industry-specific scenarios, or the need for a separate proceeding do not undermine the Commission's authority to determine compensatory charges within the tariff process. Similarly, arguments raised in respect of open-access imports versus CPP generation, renewable co-located plants, rooftop installations, or partial-load CPPs overlook that CMD entitlements deal only with rights of consumption, not the broader system-readiness obligations that arise from synchronous parallel operation. The reliance on installed capacity as the basis for quantification is neither arbitrary nor disproportionate; it reflects the extent to which the connected generator influences fault levels, stability margins, and protection-system requirements. Consequently, the proposal of DISCOMs to levy GSC and the methodology adopted are both reasonable and consistent with technical standards, regulatory principles.
5.	The Hon'ble Commission may (a) cause a scientific study to be conducted by an appropriate technical organisation on the issue of the actual incidence of availment of grid support by CPPs of	The existing framework sufficiently enables stakeholder consultation, technical scrutiny, and differentiation where justified, and therefore the Objector's request for additional processes does not merit acceptance.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	different types of industries and the appropriate methodology of computation of the quantum of grid support charges for each such type of industry; and (b) issue a discussion paper on the levy and quantification of grid suport charges for different types of industies; and (c) evolve the criteria as to when and to what extent grid support can be considered to be availed and to determine the charges leviable duly differentiated on the nature of load and/or nature of the industry duly providing for hearing of the affected parties.	

10, 11, 12, 13. Response to Mr. Vijaya Bhasker, Mr. Sridhar Reddy, Mr. Domaru Ram and Mr. Sri Ranga Rao Bharatiya Kisan Sangh

S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	The company has not sustained the measures to bridge revenue gap by operational efficiency.	TGDISCOMs submit that they are continuously striving to improve operational efficiency by implementing loss reduction measures and power purchase optimization initiatives. These efforts are ongoing and sustained, and the details have been comprehensively outlined in the Operational Performance chapter of the ARR filings.
2.	Customer complaints, accident cases details are to be provided	TGDISCOMs submit that the details of consumer complaints and accident cases, along with ex-gratia sanctioned, have already been furnished as part of the ARR filings.

14	**L.Manik Reddy S/o Linga reddy, H.No:1-39, Village:Nareguda, Post:Vikarabad, Mdl:Navabpet, Pin code:50101**	
	డిపార్ట్మెంట్ పుస్తకములు తెలుగు లో కూడా ముద్రించుటకై. కరెంటు డిపార్ట్మెంట్ వారు తమకు సంబంధించిన అన్ని రకాల ఉత్తర ప్రత్యుత్తరాలు మరియు డిపార్ట్మెంట్ కు సంబంధించిన ప్రతి సమాచారం కూడా తెలుగు భాష లో అచ్చు వేయించగలరని తమ ద్వారా కోరుచున్నాము.	మీరు సూచించిన సూచనలు పరిగణ లోకి తీసుకోవడం జరిగింది. కావున తరువాత అవకాశం ఉన్నప్పుడు తప్పకుండా తెలుగు భాష లో కూడా అచ్చు వేయిస్తాము.

15.	**M.Sridhar Reddy, Bharatiya Kisan Sangh, F.No. G2 H.No. 2-1-174 & 175, Old Ramalayam Veedi, Rajput Residency, Nallakunta, Hyderabad- 500044**	
	1.2025-26 టారిఫ్ ఆదేశాలలో GMR Airport లో వాణిజ్య విమాన సరఫరా వినియోగాలను విడదీసి వివరాలు మూడు నెలల లోపల సమర్పించుటకు గతములో ఆదేశాలు ఇవ్వడం జరిగింది. కానీ కంపెనీ ఇప్పటికి కూడా అమలులోకి తేలేదు. ఈ వివరాలు పొందుపరిచిన తరువాతనే ఆదాయ ప్రతిపాదనలు పరిశీలించగలరు. **2.**దశాబ్దాలుగా ఈ ప్రతిపాదనలకు సంబంధించిన వివరాలు తెలుగు భాష లో వెలువరించుట లేదు, ఇంతకు పూర్వమే కమిషన్ వారు తగు ఆదేశాలు ఇవ్వడం జరిగింది. అయినప్పటికీ ఆదేశాలను బేతకారు చేస్తూ ఆంగ్లం లోనే సమర్పిస్తున్నారు. వీటిని నిర్బంధంగా తెలుగు లోనే సమర్పించే విధంగా తగు ఆదేశాలు జారీ చేయాలి.	**1.**కమిషన్ వారి ఆదేశాల మేరకు GMR విమానాశ్రయం లో వెలుపల ఉన్న వాణిజ్య వినియోగానికి సంబంధించిన విద్యుత్ లోడ్స్ ల ను విభజించి బిల్లింగ్ చేయుట జరుగుచున్నది. **2.** మీ సూచనలను పరిగణ లోకి తీసుకోవడం జరిగింది.

16. Guda Mahender Reddy S/o. Malla Reddy R/o Velikatta M/o Kondapak Siddipet District, Telangana State, Phone No.9396679143		
	1 . వ్యవసాయ పొలాల వద్ద ట్రాన్స్ఫార్మర్ ఓవర్ లోడ్ అయితే సమస్యని తీర్చే బాధ్యత ఎవరిది. 2 . రైతు లు డబ్బులు పెట్టి ఎస్టిమేషన్ వేయించుకుని అదనపు ట్రాన్స్ఫార్మర్ పెట్టించుకోవాలా. అలాగైతే కనెక్షన్ కోసం ఎస్టిమేషన్ డబ్బులను తిరిగి ఇస్తారా.. ఇవ్వరా.. 3 . రైతు లు విద్యుత్తు షాక్ తో మరణిస్తే తక్షణ సాయం చావు ఖర్చు లకు ఇస్తారా.. సంవత్సరానికి ఇస్తారా.. మిగతా డబ్బులు ఇవ్వడానికి ఎన్ని రోజులు కాలపరిమితి ఉంది. 4 . రైతు లు చనిపోయినప్పుడు ఇంటిమేషన్ ఇస్తున్నారు. దీని ఆధారంగా పరిశీలన జరిపించి ప్రాసెస్ చేయవచ్చు. కాని కాగితాలు సరిగ్గా లేవని కాలయాపన జరుగు సందర్భాలు ఉన్నాయి, డెత్ సిర్టిఫికెట్ ఆధారంగా ప్రాసెస్ చేయవచ్చా... లేదా...దయచేసి తెలుపగలరు.	1. వ్యవసాయ డిస్ట్రిబ్యూషన్ ట్రాన్స్ఫార్మర్ (DTR) ఓవర్‌లోడ్ అయిన చోట, డిపార్ట్మెంట్ అదనపు ట్రాన్స్ఫార్మర్‌ను ఏర్పాటు చేస్తుంది లేదా ఉన్న ట్రాన్స్ఫార్మర్ సామర్థ్యాన్ని పెంచుతుంది 2. విద్యుత్ షాక్ కారణంగా మనిషి మరణించిన సందర్భంలో, అర్హులైన లబ్ధిదారులకు డిపార్ట్మెంట్ రూ. 5,00,000 ఎక్స్-గ్రేషియా చెల్లిస్తుంది. 3. పరిహారం (ex-gratia) ప్రక్రియను ప్రారంభించడానికి కేవలం మరణ ధృవీకరణ పత్రం (death certificate) మాత్రమే సరిపోదు. సంబంధిత శాఖ సూచించిన విధంగా అదనపు పత్రాలను తప్పనిసరిగా సమర్పించాల్సి ఉంటుంది

17. K Jeshwanth Reddy, S/o. Narsi Reddy, H.No.11-1-78/2, Shivaji Nagar Siddipet, Pincode: 502103, Ph.No.9866602852		
11	1. రైతు ల ట్రాన్స్ఫార్మర్ కాలిపోతే ఎవరు తీసుకెళ్ళాలి... 2. రైతు లు తీసుకెళ్లిన లోడింగ్ అన్ లోడింగ్ అని 6 ,000 /- రూపాయలు వసూలు చేస్తున్నారు. ఈ డబ్బులు ఎందుకు ఇవ్వాలి.. 3. చెల్లించిన డబ్బులు రశీదు లు ఇస్తారా.. రిఫండ్ ఇస్తారా.... 4. సిద్దిపేట జిల్లా లో DD లు కట్టి కనెక్షన్ ల కోసం వేచి ఉన్నారు. DD లు కట్టినంక ఎన్ని రోజులకి కనెక్షన్ ఇస్తారు.. దానికి ఏమైనా కాల పరిమితి ఉందా... 5. ప్రభుత్వం వ్యవసాయానికి 18 గంటల కరెంటు ఇస్తున్నాం అని చెప్తుంది కానీ రోజుకి 14 గంటల కి మించి ఇవ్వట్లేదు. దీనికి కారణం ఏమిటి. ఇంకా ప్రభుత్వం ఇచ్చిన కరెంటు సప్లై నుండి 18 గంటల నుండి 14 గంటలు రైతు లకు ఇచ్చింది. పోగా మిగిలిన కరెంటు ఎటు పోయింది. పై విషయాలన్నింటికీ మాకు వివరణ కావాల్సింది గా మీతో సవినయంగా మనవి చేస్తున్నాము.	**1.** డిపార్ట్మెంట్ వారు పాడైపోయిన DTRను ఫీల్డ్ నుండి SPMకు మరియు బాగున్న (healthy) DTR ను SPM నుండి ఫీల్డ్ కు రవాణా చేస్తారు. **2&3**. రైతులు స్వయంగా DTR (డిస్ట్రిబ్యూషన్ ట్రాన్స్ ఫార్మర్)లను రవాణా చేస్తే, వారికి విద్యుత్ శాఖ రవాణా ఛార్జీల కింద ₹750 (మండలం లోపల అయితే) మరియు ₹1,000 (మండలం వెలుపల అయితే) అందజేస్తుంది. రైతులు లోడింగ్ లేదా అన్-లోడింగ్ ఛార్జీలు చెల్లించాల్సిన అవసరం లేదు. ఎవరైనా అటువంటి ఛార్జీలు డిమాండ్ చేస్తే, రైతులు వెంటనే సంబంధిత శాఖ అధికారులకు తెలియజేయాలి. అన్ని SPM షెడ్ల వద్ద సంప్రదింపు నంబర్లు ప్రదర్శించబడ్డాయి. 4. వ్యవసాయ విద్యుత్ కనెక్షన్ల కోసం, రిజిస్ట్రేషన్ దశ నుండి సర్వీసు మంజూరు చేసే వరకు '**ముందు వచ్చిన వారికి మొదటి ప్రాధాన్యత**' **(FIFO - First In, First Out)** అనే నియమాన్ని పాటిస్తారు. ఈ నిబంధన ప్రకారమే ఖచ్చితంగా సర్వీసులు విడుదల చేయబడతాయి. 5. విద్యుత్ గ్రిడ్ భద్రతను దృష్టిలో ఉంచుకొని, LMRC ఆదేశాల ప్రకారం వ్యవసాయ విద్యుత్ సరఫరా అందించబడుతోంది.

18.Konatham Lingareddy, H.No.102, Vinayaka Homes, Vidyanagar Miriyalaguda, Nalgonda District	
మిరియాలగూడ మండలం లో గూడు గ్రామం లో గత సంవత్సరం దైద రాజశేఖర్ రెడ్డి పొలం లో కరెంటు ట్రాన్స్ఫార్మర్ కోసం దిమ్మె కు 15000 /- రూపాయలు, స్తంభాలు మెటీరియల్ ట్రాన్స్పోర్ట్ కు 5000 /- రూపాయలు మరియు లేబర్ ఖర్చు కోసం 10 ,000 /- రూపాయలు మొత్తము 30 ,000 /- రూపాయలు కరెంటు వాళ్ళు తీసుకున్నారు.	పిటిషనర్ తన పిటిషన్‌లో లైన్‌మెన్ పేరు గాని మరియు ఏ ఇతర పూర్తి వివరాలు స్పష్టంగా తెలుపలే దు. అలాగే, పిటిషన్‌లో ఎలాంటి ఆధారాలు మరియు నిర్దిష్ట తేదీని కూడా పేర్కొనలేదు. అందువల్ల, వివరాలు తెలియ చేయగలరని కోరుచున్నాము.

19.	**Vidyasagar, Thopucherla Village, Vemula Mandal, Nalgonda Dist - 9618277757**	
	మేము అనగా గ్రా'' తోపుచర్ల మం''వేముల జిల్లా నల్గొండ కు సంబంధించిన వ్యవసాయదారులము. మాకు సంబంధించిన వ్యవసాయ బోరు కరెంటు కనెక్షన్ కు సంబంధించిన ట్రాన్స్ఫార్మర్ స్థాన మార్పిడి మరియు లూస్ లైన్స్ కు స్తంభాలు మరియు బోరు బావుల వద్దకు వచ్చు లైన్ లను కరెంటు స్తంభాలు దగ్గరగా లేక సర్వీస్ వైర్ ద్వారా చాలా దూరం ప్రమాదకరంగా లైన్ లు కలవు. ఇట్టి మా యొక్క ఇబ్బందిని దయచేసి గమనించి మాకు సంబంధించిన కరెంటు లైన్ లు మరియు లూస్ కాంటాక్ట్ లైన్స్ కు పోల్స్ మరియి ట్రాన్స్ఫార్మర్ కు ఎక్స్టెంజి చేయించగలరని మనవి.	మీ యొక్క వినతిని వినియోగదారుల సేవా కేంద్రం (CSC) లో రిజిస్టర్ చేసుకొని, లైన్లు మరియు డిస్ట్రిబ్యూషన్ ట్రాన్స్ఫార్మర్లు మార్పు కోసం అంచనా వ్యయం చెల్లిస్తే తప్ప, విద్యుత్ శాఖ ఆ పనులను చేపట్టదు. లైన్ల మార్పిడి కోసం వినియోగదారుల సేవా కేంద్రం (CSC) లో ఫిర్యాదు నమోదు చేసుకోవాలని మరియు మార్పిడి అంచనా మొత్తాన్ని చెల్లించడానికి సమ్మతి లేఖను ఇవ్వాలని DE ఆపరేషన్ మిరియాలగూడ కోరడమైనది.

20. Poosala Nagesh S/o Narsinga rao, Vil:Gadicharlapally, Mdl:Siddipet, Telangana - 9393006022		
	అబ్జాక్షన్	రిప్లై
	1. గతం లో వేసిన కేబుల్ వైర్లు కాలిపోతే రైతు లే వేసుకోవాలా లేదా మీరే ఇస్తారా 2. అర్బన్ ఏరియా లో అగ్రికల్చర్ చేస్తున్న వారికీ వ్యవసాయ భూమి ఇండ్లు ప్రక్కప్రక్కనే నిర్మించుకోవడం వలన అగ్రికల్చరల్ కనెక్షన్ ఇవ్వడానికి నాలా కనెక్షన్ క్రిందికి లేదా కమర్షియల్ క్రిందికి వస్తుందని అంటున్నారు . మరి ఆ రైతుకు అగ్రికల్చరల్ కరెంటు వాడుకోవాలంటే అర్హత ఉందా లేదా . 3. వ్యవసాయానికి కరెంటు ఇవ్వకపోతే అర్బన్ రైతు వ్యవసాయం చెయ్యాలా వద్దా. దయచేసి తెలుపగలరు.	1. మీరు మీ సమస్యని ఒక అప్లికేషన్ రాసి మీ సంబంధిత ఏ.ఈ. ఆపరేషన్ గారికి ఇస్తే వారు పై అధికారులకి పంపించి బడ్జెట్ ఇచ్చిన తరువాత ఎస్టిమేషన్ వేసి కేబుల్ మారుస్తారు. 2. మీ వ్యవసాయ భూమి నాలా కన్వర్షన్ కాకుండా ఉంటె మీకు వ్యవసాయ కనెక్షన్ ఇవ్వగలం . అప్పుడు మీకు వ్యవసాయం చేసుకోవడానికి కరెంటు వాడుకోవడానికి అర్హత ఉంటుంది.

21. Chepuri Chandragoud S/o. Yella goud, R/o.Lingapur, M/oThoguta, District:Siddipet, Telangana, Pincode:- 5022788, Phone No.9441764124		
9.	1 . బీడు భూములు గా ఉన్నప్పుడు ఇష్టానుసారం గా లైను లు వేసి సప్లై ఇచ్చారు కానీ ఇప్పుడు తెలంగాణ వ్యాప్తంగా అందులో సిద్ధిపేట ప్రాంతం లోని మూడు డివిజన్ ల లో మొత్తము సాగుభూములు గా మారినాయి. ఈ సందర్భం లో ..... అ) పొలాలలో ట్రాన్స్ఫార్మర్ లు సపోర్ట్ వైర్లు ఉండి అర్ధంగు రావడం జరుగుతుంది. అలాగే అవ్వి రిపేరు వచ్చినప్పుడు చుట్టూ పొలాలు ఉండడం వల్ల తీయడానికి ఇబ్బంది గా మారింది. దీనికి బాధ్యత రైతులదేనా. ఆ) కొన్ని ప్రాంతాలలో మా రైతు లే ట్రాన్స్ఫార్మర్ లను భుజాలపై తీసుకు వచ్చి కర్టెలకు తాళ్లు కట్టి కావడి రూపం లో గడ్డ పైకి తెస్తున్నారు. ఈ క్రమం లో ఏదైనా జరిగితే ఆ నష్టాన్ని ఎవరు నింపుతారు. ఇ) ట్రాక్టర్ ల లో కూడా రైతు లే తీసుకు వస్తున్నారు. ఎక్కించేటప్పుడు దించేటప్పుడు కాలు చేయి విరిగితే బాధ్యు లు ఎవరు. ఈ) 40 -50 సం// ల కింద ఏర్పాటు చేసిన పాత వైర్లు స్తంభాలు, ఇనుప స్తంభాలు, కొన్ని దగ్గర్ల లో వైర్లు కింద జారడం ఇలాంటివి ఎప్పుడు సరిచేస్తారు. రైతు లే చేసుకోవాలా. దయచేసి తెలుపగలరు.	1. వ్యవసాయ భూమి మధ్యలో ఉన్న ట్రాన్స్‌ఫార్మర్ (DTR) వల్ల మీరు ఎర్తింగ్ సమస్యను ఎదుర్కొంటున్నట్లయితే, ఆ ట్రాన్స్ ఫార్మర్ మరియు స్తంభాలను మార్చడానికి (shifting) వినియోగదారుల సేవా కేంద్రం (CSC)లో ఫిర్యాదు చేయాలి. దాని ప్రకారం, సంబంధిత అధికారులు ఖర్చును అంచనా వేసి (estimate), చెల్లించాల్సిన డిమాండ్ ఛార్జీల వివరాలను మీకు తెలియజేస్తారు. మీరు ఆ డిమాండ్ ఛార్జీలను చెల్లించిన తర్వాత, ట్రాన్స్‌ఫార్మర్ మరియు స్తంభాలను వేరే చోటికి తరలించడం జరుగుతుంది. కొత్త కనెక్షన్‌ల మంజూరు కోసం లేదా మరే ఇతర అవసరాల కోసం DTR (ట్రాన్స్ ఫార్మర్)ను రవాణా చేయాల్సిన బాధ్యత ఎవరికీ ఉండదు. రవాణా ఏర్పాట్లను సంబంధిత శాఖయే చూసుకుంటుంది. ఒకవేళ ఏవైనా ఇబ్బందులు ఎదురైతే, వెంటనే ఉన్నతాధికారులకు సమాచారం అందించండి. 2. "లైన్లు వదులుగా ఉన్న చోట మధ్యంతర స్తంభాలను ఏర్పాటు చేస్తారు, మరియు తుప్పు పట్టిన లేదా దెబ్బతిన్న ఇనుప స్తంభాలను మారుస్తారు."

22. Kotla Balakistareddy S/o. Narayana Reddy, Saidpally (V), Parigi(M) Vikarabad District, Ph.No.9347546963		
	మాది సైదపల్లి గ్రామం కాలిన ట్రాన్స్ఫార్మర్ ను మార్చుటకై మా చేతనే అనగా రైతుల చేతనే తరిలించారు. ఆటో కు రూపాయలు 2000 /- ఖర్చు అయ్యింది మరియు అదనంగా ఇతర ఖర్చుల కింద సుమారు మూడు వెయ్యిలు ఖర్చు అయ్యింది మరియు ట్రాన్స్పోర్ట్ విషయం కరెంటు వాళ్ళు చెయ్యాలి అని అంటున్నారు. కానీ మా చేతనే చేయిస్తున్నారు. కావున దయచేసి ఇక ముందు మీరే చేయగలరని కోరుచున్నాము.	మేము సరిగ్గా విచారణ జరుపగా మాకు ఈ యొక్క ఫిర్యాదు తప్పు అని తెలిసినది అని DE ఆపరేషన్ వికారాబాద్ సర్కిల్ గారు తెలియజేయడమైనది.

23.	**G. Chandraih, District Secretary of Bharatiya Kisan Sangh, H.No.5-15, Nandi Vaddeman village, Bijinapalli -Mandal, Nagarkurnool -district, Pin code No.509215, Ph.No.9492992069**	
	1. జిల్లా లో HT లైన్ లు చాలా సంవత్సరాల కింద లాగడం జరిగింది. అట్టి లూజు లైన్ కింద ఇంటర్ పోల్స్ వేయుట గురించి 2. బిజినాపల్లి మండల కేంద్రం లో ఉన్న అన్ని గ్రామాలకు లో వోల్టేజి వాళ్ళ విద్యుత్తు అంతరాయము కలుగుచున్నది. కాబట్టి బిజినాపల్లి పరిసర ప్రాంతం లో 33KV లైను రోజుకు సుమారు నాలుగు అయిదు సార్లు అంతరాయం ఏర్పడటం జరుగుతుంది. దీని వాళ్ళ రైతుల పంట పొలాలు సరిఅయిన విద్యుత్తు లేక ఎండిపోయి రైతులు ఇబ్బంది పడుతున్నారు ఇట్టి సమస్యని నివారించుట గురించి. 3. నంది వడ్డెమాను సుబ స్టేషన్ నుంచి అగ్రికల్చర్ కు మరియు గ్రామానికి ఒకే ఫీడెర్ ఉంది గ్రామం లో లైట్స్ వేసినప్పుడు కానీ ఏ చిన్న పనికి అయినా LC తీసుకున్నప్పుడల్లా అగ్రికల్చర్ కు ఇబ్బంది కల్గుతుంది. కావున సెపెరేట్ ఫీడెర్ ఏర్పాటు చేయుట గురించి.	1) 180 ఇంటర్మీడియట్ పోల్స్ గురించి ఎస్టిమేట్ సాంక్షన్ అయ్యింది. 150 ఇంటర్మీడియట్ పోల్స్ వేయడం యొక్క పని పూర్తి అయినది. ఇంకా 30 ఇంటర్మీడియట్ పోల్స్ వేయడం యొక్క పని జరుగుతు ఉన్నది.తొందరలోనే HT ఇంటర్మీడియట్ పోల్స్ వేస్తాము. 2) కొత్త 33KV లైను ని మర్రికల్ 220KV /132 /33 KV సబ్ స్టేషన్ నుండి ప్రతిపాదించడము జరిగింది. ఆ పని జరుగుతోంది 3) ఎస్టిమేట్ నంబర్: T-2532-35-01-13-01-004, ఈ ఎస్టిమేట్ లో ది వడ్డేమాన్ గ్రామం కొరకు సెపెరేట్ 11KV ఫీడెర్ సాంక్షన్ అయ్యింది. పని పురోగతి లో ఉంది(జరుగుతుంది). 4) ఈ యొక్క 2025 -26 సంవత్సరానికి గాను ఇప్పటివరకు 1318 ఫెయిల్ అయిన ట్రాన్స్ఫార్మర్స్ లను డిపార్ట్మెంట్ వాహనం లో తరలించడం జరిగింది. 5) ఆక్సిడెంట్ ID NGKL2436225 Non -

	నోట్: (గత సంవత్సరం కూడా ఈ ఫీడెర్ సెపెరేట్ చేయాలని ERC లో ఫిర్యాదు చేయడం జరిగింది. అయినా ఇప్పటివరకు ఎలాంటి పని జరగలేదు.) 4. కాలిపోయిన ట్రాన్స్ఫార్మర్ లు డిపార్ట్మెంట్ వాళ్ళు తీసుకుపోవడం లేదు. 5. ఆక్సిడెంట్ ID NGKL2436225 Non - డిపార్ట్మెంటల్ ఫాటల్ ఎలక్ట్రికల్ ఆక్సిడెంట్ వలన తేదీ: 13.09.2024 నాడు ఒక గేదె చనిపోవడం జరింగింది. అది శ్రీమంతుల శివలింగం S/o బచ్చన్న, H .No:1-64, ఔరాజపల్లి గ్రామం నాగర్కర్నూల్ మండల్ మరియు జిల్లా.నష్టపరిహారం చెల్లించుట గురించి.	డిపార్ట్మెంటల్ ఫాటల్ ఎలక్ట్రికల్ ఆక్సిడెంట్ వలన తేదీ: 13.09.2024 కు నష్ట పరిహారం మంజూరు అయ్యింది. డబ్బులు చెల్లించడానికి LOC అప్లై చేసారు, LOC no 10024447/06.02.2026 తొందర్లో మీ చేతికి అందజేస్తారు.

24. M Rajenderreddy S/o. Ram Reddy, Chityala (post & Village), Pargi Mandal, Vikarabad District, Ph.No.9704991958		
15.	విషయం : అదనపు ట్రాన్స్ఫార్మర్ గురించి మాది చిట్యాల గ్రామం. గ్రామం లో ట్రాన్స్ఫార్మర్ పై లోడ్ ఎక్కువ అయినందున మోటార్లు కాలిపోవుచున్నాయి. గతం లో అనేక సార్లు అధికారులకు విన్నవించుకున్నాము. అయినా కూడా మా ఇబ్బంది తీరలేదు. కావున మా సమస్య ని పెద్ద మనసు తో తీర్చగలరు. అదనపు ట్రాన్స్ఫార్మర్ ఏర్పాటు చేయగలరు. రైతు ల అందరి లిస్టు(18 మంది) కూడా మీకు తెలియచేయుచున్నాము. ఎక్కువ మోటార్లు ఉన్నందున మాకు నష్టం జరుగుతుంది.	అదనపు వ్యవసాయ ట్రాన్స్ఫార్మర్ కోసం ఎస్టిమేషన్ పూర్తి అయ్యి మరియు సాంక్షన్ కూడా అయినది. తదుపరి 15 రోజులలో పూర్తి అవుతుంది అని DE ఆపరేషన్ వికారాబాద్ సర్కిల్ గారు తెలియజేయడమైనది.

25. Sama Govardhan Reddy, H.No.6-114, Kamareddy guda village, Post:Dhannaram, Vikarabad Mandal, Vikarabad District, Ph.No.9989956189

	అదనపు ట్రాన్స్ఫార్మర్ ఏర్పాటు పై మాది గ్రామం కామారెడ్డి గూడ వికారాబాద్ మండలం మరియు జిల్లా. మా గ్రామం లో అనేక సంవత్సరాలు గా ఒకే ట్రాన్స్ఫార్మర్ పై 32 మంది మోటార్లు ఉన్నాయి. ఫ్యూజు పోయి రోజులో చాలా సార్లు కరెంటు అంతరాయం కల్గుతుంది. మోటార్లు కాలిపోవుచున్నాయి. అధికారులకు అనేక సార్లు చెప్పుకున్నా మా విషయం పట్టించుకోవడం లేరు. మీ ద్వారా అదనపు ట్రాన్స్ఫార్మర్ ఏర్పాటు చేసి మా సమస్య తీర్చగలరు.	అదనపు వ్యవసాయ ట్రాన్స్ఫార్మర్ కోసం ఎస్టిమేషన్ పూర్తి అయ్యి మరియు సాంక్షన్ కూడా అయినది. తదుపరి 15 రోజులలో పూర్తి అవుతుంది అని DE ఆపరేషన్ వికారాబాద్ సర్కిల్ గారు తెలియజేయడమైనది.

26. Edhula Anjanreddy, Village:Chowdarpally, Vangoor – Mandal, Kalvakurthi Division, Nagarkurnool – District, Ph.No. 8790983131		
12.	పోల్కంపల్లి సబ్ స్టేషన్ పరిధి లో గల డిండి ఫీడెర్ విద్యుత్ లైను లు వేసి చాలా సంవత్సరాలు గడుస్తుంది. కాబట్టి ప్రతి సంవత్సరము ఆయొక్క లైను మధ్య మధ్య లో తెగిపొయ్యి విద్యుత్ అంతరాయం కల్గుతుంది. దీని వల్ల మనుషులకి కానీ మూగ జంతువులకు కానీ ప్రమాదాలు జరిగే అవకాశం ఉంది. ఇట్టి విషయం పై గత సంవత్సరము ERC లో ఫిర్యాదు చేయడం జరిగింది. అయినా ఇప్పటి వరకు ఆ పని పూర్తి కాలేదు, కాలిపోయిన ట్రాన్స్ఫార్మర్ లు డిపార్ట్మెంట్ వాళ్ళు తీసుకుపోవడం లేదు.	1. ఎస్టిమేట్ నంబర్: T-2445-35-01-24-02-003, ఈ ఎస్టిమేట్ 11KV దిండి ఫీడర్ పై దెబ్బతిన్న కండక్టర్‌ను మార్చడానికి వేయడం జరిగింది మరియు సాంక్షన్ అయ్యింది మరియు పనులు జరుగుతున్నాయి. 2. ఈ యొక్క 2025 -26 సంవత్సరానికి గాను ఇప్పటివరకు 1318 ఫెయిల్ అయిన ట్రాన్స్ఫార్మర్స్ లను డిపార్ట్మెంట్ వాహనం లో తరలించడం జరిగింది

27. Gadige Gajender , S/o. Bhimaiya, Nagal Kunta Village, Shabad Mandal Pincode:509217, Ranga Reddy District		
14.	**1.**మూడు రోజులు గా కరెంటు రావడం లేదు అని రైతు లు అధికారులకి విన్నవించగా మూడు రోజుల తర్వాత AE రాంమూర్తి గారు అక్కడికి వచ్చి కూర్చుని రైతు ని స్తంభాల పైకి ఎక్కించి HG ఫ్యూజు వేయిస్తున్న దృశ్యం 14 .01 .2026 న సీఎండీ పేషీ DE గారికి 8712468019 నంబరు కు వాట్సాప్ పంపి సీఎండీ గారి దృష్టి కి తీసుకుపోయి విజ్ఞప్తి చేయడం అయినది. ఇక ఈ విషయమై తీసుకున్న చర్యల వివరములు తెలుపగలరు.	1. "నమస్తే తెలంగాణ దినపత్రికలో **'అధికారుల నిర్లక్ష్యం - రైతున్నకు ప్రాణసంకటం'** అనే శీర్షికతో వచ్చిన వార్త ఆధారంగా, నర్సాపూర్ ఏఏఈ (ఆపరేషన్) శ్రీ డి. రామ్ మూర్తిపై విధి నిర్వహణలో ఘోరమైన నిర్లక్ష్యం వహించినందుకు మరియు బాధ్యతారాహిత్యంగా వ్యవహరించినందుకు గాను శాఖాపరమైన చర్యలు తీసుకోవడం జరిగింది. ఆయనకు షోకాజ్ నోటీసు (కారణం చూపాలని కోరుతూ నోటీసు) జారీ చేసి, తుది ఉత్తర్వులను వెలువరించారు."

	2.బండ వెంకట్ రాం రెడ్డి బండ శ్రీనివాస్ రెడ్డి అనే ఇద్దరు రైతు లు తమ వ్యవసాయ పొలం లో బోరు మోటార్లకు కనెక్షన్ లు ఇవ్వడానికి ఒక సంవత్సర కాలం గా తిరిగి తిరిగి స్థానిక లైనుమెను గారికి విడతల వారీగా 50 ,000 /- రూపాయలు ఆన్లైన్ మరియు ఆఫ్ లైను ద్వారా ఇచ్చినారు. సుమారు 25 రోజుల క్రితం BKS దృష్టికి రాగా మేము నల్గొండ DE గారి దృష్టి కి తీసుకు వెళ్ళినాము, వారి దృష్టి కి పోయి 20 రోజులు అయినా వారు రైతు కి డబ్బులు ఇప్పించ లేదు. ఈ విషయమై DE గారిని అడుగగా మిమ్ములను డబ్బులు ఎవరు ఇవ్వమని అన్నారు. పై అధికారులకు ఫిర్యాదు చేస్కోండి అని బాధ్యతా రహితంగా మాట్లాడినారు. ఆ తర్వాత నల్గొండ SE గారి దృష్టి కి తీసుకుపోగా రెండు రోజులలో ఆ రైతు లకు డబ్బులు ఇప్పించారు. ఈ విషయమై పూర్తి విచారణ జరిపి తగు చర్యలు తీసుకుంటారని మనవి. కాలిపోయిన ట్రాన్స్ఫార్మర్ లు డిపార్ట్మెంట్ వాళ్ళు తీసుకుపోవడం లేదు.	పిటిషనర్ తన పిటిషన్‌లో లైన్‌మెన్ పేరు, ప్రాంతం పేరు మరియు లైన్ మెన్‌కు ఏ ప్రయోజనం కోసం డబ్బు ఇచ్చారో పేర్కొనలేదని తెలియజేయడమైనది. అలాగే, పిటిషన్‌లో ఎలాంటి ఆధారాలు మరియు నిర్దిష్ట తేదీని కూడా పేర్కొనలేదు. అందువల్ల, దీనిని చెల్లని ఫిర్యాదుగా పరిగణించవచ్చు అని SE ఆపరేషన్ సర్కిల్ నల్గొండ తెలియజేయడమైనది.

28.	**N. Venkatareddy Village:Kerella, Dharoodh Mandal, Vikarabad Dist-501121 - 9849127346**	
	మాది కేరెళ్ళ గ్రామం వికారాబాద్ జిల్లా ధరూర్ మండలం. మా మామగారు 2021 సం// లో అనగా 5 సం// ల క్రితం కరెంటు షాకు కారణంగా చనిపోయినారు. ADE గారికి దరఖాస్తు చేస్కున్నాము. కానీ జరిగిన విషయం గత సం// ERC సమావేశం లో మీ దృష్టికి తీసుకు వచ్చినాము. కానీ మాకు ఎలాంటి పరిహారము అందలేదు. మీరు జరిగిన విషయం విని సాయం చేస్తామని చెప్పియుంటిరి. అలాంటి పరిహారము ఇప్పించి ఆదుకొనగలరని మనవి. (ఆక్సిడెంట్, Non-డిపార్ట్మెంటల్ ఫాటల్ ఎలక్ట్రికల్ ఆక్సిడెంట్ తేదీ: 12.06.2021 at 02:00PM నాడు ఒక రైతు చనిపోవడం జరింగింది. అది ఎన్. చంద్రా రెడ్డి S /o మాణిక్ రెడ్డి, కేరెళ్ళ గ్రామం. నష్టపరిహారం చెల్లించుట గురించి)	2021 జూన్ 12వ తేదీన ఈ ప్రమాదం జరిగిందని, అయితే ప్రమాదం జరిగిన సమయంలో ఈ విషయాన్ని విభాగానికి నివేదించలేదని తెలియజేయడమైనది. ERC (విద్యుత్ నియంత్రణ మండలి) విచారణలో ఈ అంశం ప్రస్తావనకు వచ్చిన తర్వాత, దీనిపై స్పష్టత వచ్చింది. అనంతరం విభాగానికి చెందిన సిబ్బంది ఎన్. చంద్రారెడ్డి కుటుంబ సభ్యులను సంప్రదించి, ప్రాథమిక నివేదికను 2025 మార్చి 22వ తేదీన ఈ కార్యాలయానికి సమర్పించారు. ఆ ప్రాథమిక నివేదిక ప్రకారం, మృతుడు ఇంటి నిర్మాణ సమయంలో ఇనుప కడ్డీని మారుస్తుండగా, అది సమీపంలో వెళ్తున్న 11KV విద్యుత్ లైన్‌కు ప్రమాదవశాత్తు తగిలింది. దానివల్ల ఆయన విద్యుత్ షాక్‌కు గురయ్యారు. చికిత్స నిమిత్తం

		ఆసుపత్రికి తరలించగా, అక్కడ చికిత్స పొందుతూ మరణించారు. ఇకపైన మీరు కావాల్సిన డాకుమెంట్స్ (FIR నకలు, పోస్ట్ మార్టం రిపోర్టు) సమర్పిస్తే తదుపరి ప్రక్రియ పూర్తి చేసి మీకు తగిన నష్ట పరిహారం అందేలాగా చూస్తాము.

29. Response to Indian Oil Corporation Limited (IOCL), Hyderabad Terminal

S.No.	Summary of Objections / Suggestions	Response of the Licensee
15.	**Representation against the Re-categorization of HT Connection and Revision of Tariff – IOCL Hyderabad Terminal and consideration of representation in Public Hearing scheduled on 07.03.2026 (O.P. No. 80 of 2025)** we respectfully submit our request for re-categorization of the HT power connection of Indian Oil Corporation Limited (IOCL), Hyderabad Terminal, located at Cherlapally IDA. Hyderabad Terminal of Indian Oil Corporation(IOCL), located at Cherlapally IDA, is availing HT power connection (connection no : HBG594) currently categorized under HT-II (A) (Commercial). Earlier, At Hyderabad Terminal, the products i.e., Motor Spirit(petrol) and High speed Diesel are being stored and directly loaded into Tank Trucks withoutany blending process. ***At present, IOCL company carries out blending operations such as Ethanol Blended Motor Spirit(EBMS) and B7 High Speed Diesel, Xtrapremium MS andXtragreen Diesel.*** ***Also as per Govt. norms, Blending of Ethanol made mandatory or else payment of additional excise duty at the rate of Rs. 2 per litre for non-blended MS will be imposed on Oil Companies.*** The terminal is presently availing an HT connection (No. HBG594) categorized under HT-II (A) (Commercial). The said connection is utilized for operating a petroleum storage and distribution terminal involving receipt, storage,	TGSPDCL reiterates that it has submitted its report to the Hon'ble Commission, based on the inspection conducted at the IOCL Hyderabad Terminal (Service No. HBG594), it is observed that the electrical supply is being utilized primarily for activities such as storage, unloading, transfer, pumping and simple mixing of petroleum products and biofuels, with no manufacturing or processing operation carried out at the premises, as the blending of petrol (80%) and ethanol (20%) is done through transfer into existing tanks without the use of any industrial processing equipment. As per Clause 2.2 of the Tariff Order, the HT-I Industrial category applies only where electricity is used for manufacturing, processing or preservation of goods, whereas Clause 2.16 explicitly classifies Gas/Oil Storage and Transfer Stations under HT-II(A) Commercial; the activities observed at the IOCL Terminal fall squarely within this definition. Accordingly, TGSPDCL submits that the existing categorization under HT-II(A): Commercial is appropriate and the request for re-categorization to HT-I: Industrial is not supported by the nature of operations actually carried out at the premises.

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	blending, and pumping of petroleum products, including blending activities such as Ethanol Blended Motor Spirit (EBMS) and B7 High-Speed Diesel (HSD). Further, the establishment is covered under the Factories Act, and a copy of the valid Factory License has already been submitted to your good office. It is pertinent to submit that other IOCL terminals performing identical industrial operations in the State of Andhra Pradesh, such as Rajahmundry, Kakinada, Guntakal and Chittor are categorized under the HT-Industrial tariff category and copies of the corresponding electricity bills have already been furnished for kind reference. In this connection, and with reference to the public hearing scheduled on 07.03.2026 in O.P. No. 80 of 2025 regarding approval of Revised ARR, FPT, and CSS for FY 2026-27, we humbly request the Hon'ble Commission to: 1. **Consider our earlier representations along with this submission during the public hearing; and** 2. **Re-categorize the HT connection of IOCL Hyderabad Terminal from HT-II (A) (Commercial) to HT-I (A) (Industrial) and revise the applicable tariff accordingly.** Request for Recategorization : Location Address: Indian Oil Corporation Limited, Hyderabad Terminal, Survey No. 183, IDA Phase-III, Cherlapalli, Hyderabad - 500051 | HT Service Connection: HBG594 | Existing Tariff Category: HT-II (A): Commercial | New Tariff Category Request: HT-I (A): Industry General | Reasons: Blending process Operations In view of the above submission, we respectfully request for recategorization of HT Connection from **HT-II (A):**	

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	Commercial category to HT-I (A): Industry General while finalizing the retail Tariff Proposal of TGSPDCL. Further, we would request the Hon'ble Commission to afford us with an opportunity to be heard during the course of the hearing dt. 07.03.2026 to enable us to further elaborate on the request made herein above.	