



Southern Power Distribution Company of Telangana Limited
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Phone No.(040) 2343 1008 Fax Nos.(040) 2343 1395/1452 website
www.tssouthernpower.com

From
Chief General Manager (RAC),
TSSPDCL,
Corporate Office,
Mint Compound,
Hyderabad.

To
✓ The Secretary,
TSERC, 11-4-660,
5th Floor,
Singareni Bhavan,
Red Hills, Hyderabad.

Lr. No.CGM(RAC)/SE(RAC)/DE(RAC)/F. e-633532 /D.No.721/24 Dt: 01.02.2024.

Sir,

Sub: TSSPDCL – Responses to the Objections raised on Filings of Annual Performance Review on Distribution Business for FY 2022-23 – Submission - Reg.

Ref: Lr.No.TSERC/Secy/JD(TE)/F.No.e-643043 & 643255/D.No.833/23,
Dt:28.12.2023.

In reference to the above cited, it is to submit that, as per the directions issued by Hon'ble Commission the responses to the objections raised on filings of Annual Performance Review on Distribution Business for FY 2022-23 by the objectors are herewith submitted.

Encl: As above.

Yours faithfully


Chief General Manager (RAC)



SOUTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED

RESPONSES TO OBJECTIONS / SUGGESTIONS

On

Annual Performance Review (2022-23)

INDEX

S.No.	Name and Address of the Objector	Pg.No.
1	M. Thimma Reddy , Convenor, People's Monitoring Group on Electricity Regulation, H.No: 3-4-107/1, (Plot No: 39), Radha Krishna Nagar, Attapur, Hyderabad-500 048	
2	M. Venugopala Rao , Senior Journalist & Convener, Centre for Power Studies, H.No.1-100/MP/101, Monarch Prestige, Journalists' Colony, Serilingampally Mandal, Hyderabad – 500 032	
3	Kiran Kumar Vempati , H.No.1-2-1/1, Opp.CC Bank,Sri Venkateswaraswamy Temple Road, Near MM Court Circle, Suryapet-508213	

1. Response to M. Thimma Reddy

1 S.No.	M. Thimma Reddy, Convenor, People's Monitoring Group on Electricity Regulation, H.No: 3-4-107/1, (Plot No: 39), Radha Krishna Nagar, Attapur, Hyderabad-500 048	Summary of Objections / Suggestions	Response of the Licensee
1.		The following are our comments/suggestions on TSDISCOMs' filing for Annual Performance Review (true-up/down) of distribution business for the FY 2022-23 in response to Public Notice dated 02-01-2024 in O.P. Nos: 37 and 38 of 2023.	No Comment
2.		Through the above petitions towards Annual Performance Review (true-up/down) of distribution business for the FY 2022-23 TSNPDCL has shown true-down to the extent of Rs. 780.09 Crore and TSSPDCL has shown true-down to the extent of Rs. 319.80 Crore.	No Comment
3.		<p>O&M Costs:</p> <p>TSNPDCL has reported Rs. 278.70 Crore less net O&M expenditure compared to the quantum approved by the Commission during the FY 2022-23. During this period TSNPDCL recorded Rs. 387.13 Crore less employee costs than that approved by the Commission. During this period TSSPDCL has reported Rs. 131 Crore higher net O&M expenditure compared to the quantum approved by the Commission. Higher employee costs to the extent of Rs. 81.16 Crore contributed to the higher net O&M expenditure of TSSPDCL. TSSPDCL attributed this higher O&M costs to revision of pay scales in 2022. As both the DISCOMs present contrasting picture in the case of O&M costs the same needs to be subjected to scrutiny.</p>	<p>The TSSPDCL has not made any provision towards pension benefits in the FY 2021-22 and the same has been incorporated in FY 2022-23. The increase in Employee Cost for TSSPDCL (as part of O&M cost) includes the Pension benefits and Staff welfare expenses as per the Actuarial Valuation Report. TSSPDCL has provided Pension & Gratuity in respect of employees who were on rolls as on 31.01.1999 in the ratio of 26% as per Tripartite Agreement for an amount of Rs. 556.81 Crores and the Staff Welfare Expenses include provision for Medical Expenses (reimbursement) to an extent of Rs. 173.21 Crores on the basis of Actuarial Valuation Report and comments given by C & AG Audit. This led to increase in the Employee cost in turn the Gross O&M expenses over approval by the Hon'ble TSERC.</p>
4.		<p>Capital expenditure:</p> <p>Both the TSDISCOMs report lower capital expenditure than that approved by the Commission during the FY 2022-23. While NPDCL reported Rs. 286.49 Crore less return on capital employed (RoCE) SPDCL reported Rs. 281.19 Crore less RoCE than approved by the Commission during this period. Similarly, NPDCL reported Rs. 219.75 Crore less depreciation and SPDCL reported Rs. 238 Crore less</p>	<p>TSSPDCL has provided the scheme wise comparative statement of sanctioned budget to be incurred towards Capital Expenditure and Capitalised during FY 2022-23 in Annexure-IV which is made available in TSDISCOM's website. Further, TSSPDCL has an amount of Rs. 1,206.97 Crores as Capital Works in Progress (CWIP) and TSSPDCL has also disclosed the amount of impact of Price factor that</p>

1	M. Thimma Reddy, Convenor, People's Monitoring Group on Electricity Regulation, H.No: 3-4-107/1, (Plot No: 39), Radha Krishna Nagar, Attapur, Hyderabad-500 048	
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	<p>depreciation than approved by the Commission for the FY 2022-23. TSDISCOMs attributed this to less capitalisation in fixed assets compared to the approved numbers. From their filings it is not clear to what extent this was due to price factors and to what extent due to under achievement in installing sub-stations, DTRs and laying distribution lines. While TSSPDCL provided some monetary information scheme wise no information is available on physical achievements. We request the Commission to direct TSDISCOMs to provide comparative information on erection of sub-stations and DTRs and laying distribution lines. While lower capital expenditure during the year may appear like savings actually it may represent inefficient execution of capital assets.</p>	<p>is not included in computing the Regulatory Rate Base for FY 2022-23 under the head of Price Variation for an amount of Rs. 34.69 Crores. If the CWIP truned in to Capitalisation, the total capitalisation amount will be approximately 90% of the approved amount of Capitalisation for FY 2022-23 by the Hon'ble TSERC.</p>
5.	<p>Special appropriation for safety measures:</p> <p>The Commission allowed each DISCOM to spend Rs. 20 Crore towards safety measures under special appropriation to bring down the number of electrical accidents. SPDCL reported that it has spent Rs. 5.82 Crore towards safety measures. NPDCL has shown Rs. 24.72 Crore opposite special appropriation. But this included Compensation paid towards electrical accidents – no division is shown between safety measures and Compensation. SPDCL has claimed Rs. 19.76 Crore towards Compensation. Both DISCOMs did not report the number of fatal accidents covered under Compensation. One thing is clear from this: there was no let up in fatal electrical accidents in the state. They routinely list the measures taken but they do not seem to have any impact on the ground. To assess the ground situation a third-party safety audit of electrical installation needs to be taken up. The unspent amount under special appropriation may be used for this purpose.</p>	<p>The measures taken by TSSPDCL towards safety measures includes:</p> <ol style="list-style-type: none"> i. Erection of intermediate poles for proper clearance ii. Providing of Earthing iii. Providing of fencing iv. Reconstruction of damaged DTR plinth v. Plinth Raisings vi. Providing of SMC Distribution boxes vii. Providing of foot Cross arms viii. Rectification of DTR structures ix. Replacement of damaged AB cable x. Providing of safety materials viz. Gum boots, Helmets, Safety belt, Earth rods, Gloves etc. <p>The part of the expenditure incurred towards safety mearsures stated for the works mentioned above is covered in the R&M expenditure and the amount shown towards Special Appropriation for an amount of Rs. 5.82 crores is incurred towards safety equipments provided to workmen.</p> <p>Due to the above measures implemented by TSSPDCL, there is a significant decrease in the No. of Fatal and Non-Fatal Accidents of Humans and Animals when compared with the previous year and reduction in the Exgratia amount by Rs. 2.42 Crores. The comparative data is tabulated below:</p>

1 S.No.	M. Thimma Reddy, Convenor, People's Monitoring Group on Electricity Regulation, H.No: 3-4-107/1, (Plot No: 39), Radha Krishna Nagar, Attapur, Hyderabad-500 048 Summary of Objections / Suggestions	Response of the Licensee																						
		<table border="1" data-bbox="1405 348 2318 596"> <thead> <tr> <th rowspan="2">Financial Year</th> <th colspan="2">Fatal Accidents in Nos.</th> <th rowspan="2">Non-Fatal Accidents</th> <th rowspan="2">Exgratia Paid (Rs. in Crs.)</th> </tr> <tr> <th>Human</th> <th>Animal</th> </tr> </thead> <tbody> <tr> <td>2021-22</td> <td>264</td> <td>865</td> <td>47</td> <td>22.18</td> </tr> <tr> <td>2022-23</td> <td>235</td> <td>648</td> <td>34</td> <td>19.76</td> </tr> <tr> <td>Variance</td> <td>29 ↓</td> <td>217 ↓</td> <td>13 ↓</td> <td>2.42 ↓</td> </tr> </tbody> </table> <p data-bbox="1405 637 2429 707">The amount spent on Special Appropriation Justifies the decrease in the Fatal and Non-Fatal Accidents.</p>	Financial Year	Fatal Accidents in Nos.		Non-Fatal Accidents	Exgratia Paid (Rs. in Crs.)	Human	Animal	2021-22	264	865	47	22.18	2022-23	235	648	34	19.76	Variance	29 ↓	217 ↓	13 ↓	2.42 ↓
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6.	NPDCL and SPDCL claim Rs. 16.54 Crore and Rs. 34.69 Crore respectively towards price/cost variation. But no explanation is provided for the same.	<p data-bbox="1405 731 2429 872">In the terms of purchase order, the prices will be stated as 'variable', which are fixed by taking a base price index for the raw material as per IEEMA Indices communicated monthly and specifies the price variation formula for calculating the amount of price variation admissible.</p> <p data-bbox="1405 877 2429 1095">After the completion of supply of materials as per purchase order, the suppliers will submit their claim for price variation. The proposals for Price Variation from suppliers were received after capitalisation and it is not possible to apportion the price variation amount to materials after capitalisation. Hence, the price variation amount of Rs. 34.69 crores by TSSPDCL was claimed under other expenditure.</p>																						

2. Response to M. Venugopala Rao

2	M. Venugopala Rao , Senior Journalist & Convener, Centre for Power Studies, H.No.1-100/MP/101, Monarch Prestige, Journalists' Colony, Serilingampally Mandal, Hyderabad – 500 032	
S.No.	Summary of Objections / Suggestions	Response of the Licensee
1.	<p>In the subject petitions, TSSPDCL has shown a revenue surplus of Rs.319.80 crore and TSNPDCL a revenue surplus of Rs.780.09 crore. Though SPDCL has maintained that the revenue surplus includes carrying cost, the latter is not shown separately in its data. NPDCL has not made it clear whether carrying cost is included or not in the revenue surplus. From the claims of the DISCOMs that they have incurred a huge loss for the year 2022-23 - SPDCL Rs.8147.48 crore and NPDCL Rs.2955.96 crore - it is clear that the revenue surplus shown by them for the same FY is not on account of any improvement in efficiency in their performance. The expenditures approved by the Commission and actual expenditures incurred by the DISCOMs confirm that the latter could not spend the approved investments for the intended purposes of strengthening and expanding their distribution network. This dichotomy has the following implications, among others:</p> <p>a) The investments proposed by the DISCOMs and approved by the Commission are unrealistic and inflated. The DISCOMs have collected Rs.1099.89 crore more than what was permissible for the year 2022-23 from the consumers and the same has to be trued down with carrying cost. It also confirms the tendency on the part of the licensees to inflate requirement of capital investment so as to collect more charges from the consumers than what are permissible as per actual expenditures incurred and investments capitalized.</p> <p>b) If the investments proposed by the DISCOMs and approved by the Commission are realistic and actually required for maintenance, expansion and strengthening of the distribution network, then the under-performance of the DISCOMs confirms that the distribution network is strengthened and expanded inadequately and that there is deficiency in the network.</p>	<p>The revenue surplus of Rs. 319.80 crores is purely by considering the Distribution Cost components only for FY 2022-23, whereas, the losses shown for an amount of Rs. 8,147.48 crores are on account of increase in Power Purchase Cost and ISTS Transmission charges Hence, the comparison of Revenue surplus in Distribution ARR with the Net Discom's losses is not relevant.</p> <p>a) In FY 2022-23, TS Discoms have not taken up any major schemes involving heavy financial investment as per proposals of licensee and approved by Hon'ble ERC on the verge of completion of earlier schemes. Hence, the investment capitalized by TSSPDCL is lower than the amount approved by Hon'ble Commission.</p> <p>b) The investments proposed by the TSDISCOMs are based on projected load growth. However, the actual demand varies based on the requirement. Hence expansion and strengthening the Distribution Network was restricted to the requirement.</p>

2	M. Venugopala Rao, Senior Journalist & Convener, Centre for Power Studies, H.No.1-100/MP/101, Monarch Prestige, Journalists' Colony, Serilingampally Mandal, Hyderabad – 500 032	
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	<p>c) The prudence check by the Hon'ble Commission also has been found deficient, even if it reduced the investments proposed by the DISCOMs for the FY 2022-23.</p> <p>d) The investments made by SPDCL for 2022-23 is less by Rs.911.68 crore and capitalization less by Rs.727.25 crore. Regulated rate base came down by Rs.228.30 crore and return on equity by Rs.281.91 crore. In the case of NPDCL, new investments made came down by Rs.1060.48 crore and capitalization by Rs.1086.26 crore. Regulated rate base came down by Rs.2389.55 crore and return on capital employed by Rs.286.49 crore. Despite such lesser expenditure and lesser capitalization, SPDCL has shown an increase by Rs.131 crore in O&M expenditure, while NPDCL has shown a decrease in O&M expenditure by 278.70 crore. It is to be noted that O&M expenditure as approved by the Commission was on the basis of the capital investment and capitalization of assets as approved by it. In other words, the increase in O&M expenditure shown by SPDCL is questionable, both in relative and absolute terms.</p> <p>e) That the DISCOMs have shown a revenue surplus of Rs.1099.89 crore for one year of the 4th control period shows that they have been collecting excessive revenue from the consumers for their distribution business, without any justification and retaining the same for a period of five years of the control period. This makes the need and justification for arrangement of MYT questionable.</p> <p>f) SPDCL has maintained that the reasons for exceeding O&M expenses for the year 2022-23 are mainly salaries, wages and other employee costs; whereas administrative and general costs including legal charges, audit</p>	<p>c) The Hon'ble Commission has approved the filings made by the Licensee after considering the Objections from the concerned Stakeholders and after conducting the Public Hearing with all the stake holders and justification provided by TSSPDCL before approving the Distribution ARR.</p> <p>d) The increase in Employee expenses (viz., pension benefits) is the contributing factor for increase in O&M expenses of TSSPDCL. As per the Actuarial Valuation Report, TSSPDCL has provided for Pension & Gratuity in respect of employee who were on rolls as on 31.01.1999 in the ratio of 26% as per Tripartite Agreement for an amount of Rs. 556.81 Crores and the Staff Welfare Expenses includes provision for Medical Expenses (reimbursement) to an extent of Rs. 173.21 Crores on the basis of Actuarial Valuation Report and comments given by C & AG Audit..This led to increase in the Employee cost in turn the Gross O&M expenses over approval by the Hon'ble TSERC.</p> <p>Further, TSSPDCL has an amount of Rs. 1,206.97 Crores as Capital Works in Progress (CWIP). If the CWIP turned in to Capitalisation, the total capitalisation amount will be approximately 90% of the approved amount of Capitalisation for FY 2022-23 by the Hon'ble TSERC..</p> <p>e) TSSPDCL has been collecting revenue for Distribution Business strictly in accordance with the MYT Order for 4th Control Period dated 29.04.2020. Further, in FY 2022-23.</p> <p>Further, the item wise reasons that lead to the surplus was explained in the petitions filed before the Hon'ble Commission.</p> <p>f) The data considered in the filings of APR is based on the Audited Annual accounts of TSSPDCL for FY 2022-23.</p>

2	M. Venugopala Rao, Senior Journalist & Convener, Centre for Power Studies, H.No.1-100/MP/101, Monarch Prestige, Journalists' Colony, Serilingampally Mandal, Hyderabad – 500 032	
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	<p>fees, and taxes and repairs and maintenance costs have come down compared to what were approved by the Commission. These factors do apply to NPDCL also, may be, with a difference in degree. Hence, these claims of SPDCL need to be subjected to strict prudence check.</p> <p>g) Though the Hon'ble Commission did not approve any expenditure under "other expenditure," SPDCL has claimed other expenditure of Rs.57.03 crore for 2022-23. It includes price variation of Rs.34.69 crore. If there is price variation, it should be shown under heads of expenses approved by the Commission, with necessary explanation and justification for the same. Similarly, SPDCL has shown Compensation of Rs.19.76 crore, without explaining to whom such Compensation was paid and for what purpose. For asset scrap, it has shown an expenditure of Rs.2.58 crore, without explaining how such an expenditure was necessitated, even while showing a revenue accrual of Rs.16.21 crore on sale of scrap. Similarly, NPDCL has shown other expenditure of Rs.16.54 crore under cost variation of materials, without explaining for which materials such a variation has arisen and what is the necessity to show such a variation under other expenditure, instead of clubbing it with the cost of such materials, if approved by the Commission.</p>	<p>g) In the terms of purchase order, the prices will be stated as 'variable', which are fixed by taking a base price index for the raw material as per IEEMA Indices communicated monthly and specifies the price variation formula for calculating the amount of price variation admissible. After the completion of supply of materials as per purchase order, the suppliers will submit their claim for price variation. The proposals for Price Variation from suppliers were received after capitalisation and it is not possible to apportion the price variation amount to materials after capitalisation. Hence, the price variation amount of Rs. 34.69 crores by TSSPDCL was claimed under other expenditure.</p> <p>The measures taken by TSSPDCL towards safety measures includes:</p> <ol style="list-style-type: none"> i. Erection of intermediate poles for proper clearance ii. Providing of Earthing iii. Providing of fencing iv. Reconstruction of damaged DTR plinth v. Plinth Raisings vi. Providing of SMC Distribution boxes vii. Providing of foot Cross arms viii. Rectification of DTR structures ix. Replacement of damaged AB cable x. Providing of safety materials viz. Gum boots, Helmets, Safety belt, Earth rods, Gloves etc. <p>The part of the expenditure incurred towards safety measures stated for the works mentioned above is covered in the R&M expenditure and the amount shown</p>

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		<p>towards Special Appropriation for an amount of Rs. 5.82 crores is incurred towards safety equipments provided to workmen.</p> <p>Due to the above measures implemented by TSSPDCL, there is a significant decrease in the No. of Fatal and Non-Fatal Accidents of Humans and Animals when compared with the previous year and reduction in the Exgratia amount by Rs. 2.42 Crores. The comparative data is tabulated below:</p> <table border="1" data-bbox="1405 535 2318 783"> <thead> <tr> <th rowspan="2">Financial Year</th> <th colspan="2">Fatal Accidents in Nos.</th> <th rowspan="2">Non-Fatal Accidents</th> <th rowspan="2">Exgratia Paid (Rs. in Crs.)</th> </tr> <tr> <th>Human</th> <th>Animal</th> </tr> </thead> <tbody> <tr> <td>2021-22</td> <td>264</td> <td>865</td> <td>47</td> <td>22.18</td> </tr> <tr> <td>2022-23</td> <td>235</td> <td>648</td> <td>34</td> <td>19.76</td> </tr> <tr> <td>Variance</td> <td>29 ↓</td> <td>217 ↓</td> <td>13 ↓</td> <td>2.42 ↓</td> </tr> </tbody> </table> <p>The amount spent on Special Appropriation Justifies the decrease in the Fatal and Non-Fatal Accidents.</p> <p>For Asset Scrap, when the Asset is retired, the scrap generated in respect of that asset is devoluted and accounted based on the market value which can be at higher (gain) / lesser (loss) of the residual value of that particular asset and if the value is less than the residual value then that amount will effect the DISCOMs P&L statement by reducing the gains.</p> <p>The component included in Non-Tariff Income as Sale of Scrap is the amount realised when the accumulated scrap is sold to a customer.</p> <p>Further as per the Accounting policy of TSSPDCL, Scrap is valued at net realizable value as on Balance Sheet date.</p> <p>Hence the price variation and scraped assets value were claimed under Other Expenditure.</p>			Financial Year	Fatal Accidents in Nos.		Non-Fatal Accidents	Exgratia Paid (Rs. in Crs.)	Human	Animal	2021-22	264	865	47	22.18	2022-23	235	648	34	19.76	Variance	29 ↓	217 ↓	13 ↓	2.42 ↓
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2.	<p>The Hon'ble Commission has been determining annual revenue requirement of the DISCOMs, and their revenue gap is being bridged with cross subsidy, subsidy from the government and tariff hike. Furthermore, variations in revenue requirement are being allowed under uncontrollable factors as true-up and true-down. Revenue gap that arises as a result of supplying power to agriculture LT V exceeding the quantum determined by the Commission is being allowed to be recovered as additional subsidy from the government. When such is the case, what is the basis for the DISCOMs claiming a hefty loss of Rs.8147.48 crore by SPDCL and Rs.2955.96 crore, that, too, for just one financial year? If the claimed losses include dues from the government and consumers, both governmental and non-governmental, they should be treated as revenue to be collected, not as losses. That the DISCOMs have shown such hefty losses, without even explaining the reasons for incurring the same, and without claiming them under true-up, shows that they are a result of their inefficiency and impermissible. Without explaining and understanding the reasons for the so-called losses, even for the DISCOMs, it is difficult to take effective steps to prevent recurrence of such losses in future by taking necessary remedial measures in time. And, such a failure in the light of the kind of decisions taken and directions given by the erstwhile state government landed the DISCOMs in financial crisis, as is being revealed in the review meetings being held by the new chief minister and deputy chief minister, who is holding the portfolio of energy also.</p>	<p>There is no provision to claim additional subsidy from the Government for supplying power to Agriculture – LT V exceeding the quantum determined by the Hon'ble commission. TSDISCOMs submit that the claimed losses (8147.48 Cr for SP & 2955.96 Cr for NP) do not include the dues from the Government.</p> <p>The revenue surplus of Rs. 319.80 crores is purely by considering the Distribution Cost components only for FY 2022-23, whereas, the losses shown for an amount of Rs. 8,147.48 crores are on account of increase in Power Purchase Cost and ISTS Transmission charges. Hence, the comparison of Revenue surplus in Distribution ARR with the Net Discom's losses is not relevant.</p> <p>The Loss projected in the Audited Financial Accounts is arrived by considering each and every component viz., Costs & Revenues of the TSDISCOMs transacted during FY 2022-23. The Losses depicted in the Financials of TSDISCOMs are based on the Audited Accounts only and the item wise analysis of loss incurred is provided in the Audited Financial Reports.</p> <p>Major reasons for increase in cost are hike in Power Purchase cost from Central Generating stations on account of higher imported coal prices, hike in PGCIL charges, on accounts of the Mid Term True up Order for TSGENCO plants etc.</p>
3.	<p>An effective prudence check by the Hon'ble Commission of the claimed variations in expenditure and revenue of the TSDISCOMs for the year 2022-23 would reveal what is permissible and what is impermissible. It may result in higher revenue surplus by virtue of expenditures not incurred by the DISCOMs. We request the Hon'ble Commission accordingly and determine the amounts to be trued down and allow the same with carrying cost to be deducted from the monthly power bills of consumers.</p>	<p>TSSPDCL has considered the Audited Annual accounts data for preparing the Distribution Business APR for FY 2022-23 and the same were submitted to the Hon'ble TSERC.</p>

2	M. Venugopala Rao , Senior Journalist & Convener, Centre for Power Studies, H.No.1-100/MP/101, Monarch Prestige, Journalists' Colony, Serilingampally Mandal, Hyderabad – 500 032	
S.No.	Summary of Objections / Suggestions	Response of the Licensee
4.	I request the Hon'ble Commission to consider the above-mentioned submissions, among others, and provide me an opportunity to make further submissions after receiving responses of the DISCOMs and during the public hearings on the subject issues.	No Comment.

1	Kiran Kumar Vempati , H.No.1-2-1/1, Opp.CC Bank,Sri Venkateswaraswamy Temple Road, Near MM Court Circle, Suryapet-508213	
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1.	<p>1.6 Special appropriations actual is shown as 5.82cr, a deviation of -14.18cr from the approved 20 cr.</p> <p>At the same time 1.7 Other Expenditure actual is shown as 57.03cr, a deviation of full 57.03cr from the approved zero. Out of which 19.76cr alone is shown as for Compensation.</p> <p>These deviations reflecting DISCOM is compromising on the safety of consumers and employees or DISCOM ran out of ideas/ways on the same.</p>	<p>TSSPDCL has incurred the following capital works expenses towards safety measures:</p> <ol style="list-style-type: none"> i. Erection of intermediate poles for proper clearance ii. Providing of Earthing iii. Providing of fencing iv. Reconstruction of damaged DTR plinth v. Plinth Raisings vi. Providing of SMC Distribution boxes vii. Providing of foot Cross arms viii. Rectification of DTR structures ix. Replacement of damaged AB cable x. Providing of safety materials viz. Gum boots, Helmets, Safety belt, Earth rods, Gloves etc. <p>There is a significant decrease in the No. of Fatal and Non-Fatal Accidents of Humans and Animals when compare with the previous year. The comparative data is tabulated below:</p>

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		<table border="1"> <thead> <tr> <th data-bbox="1502 343 1679 417">Financial Year</th> <th colspan="2" data-bbox="1718 343 2034 376">Fatal Accidents in Nos.</th> <th data-bbox="2055 343 2192 417">Non-Fatal Accidents</th> <th data-bbox="2213 343 2376 417">Exgratia Paid (Rs. in Crs.)</th> </tr> <tr> <td></td> <th data-bbox="1718 384 1863 417">Human</th> <th data-bbox="1884 384 2021 417">Animal</th> <td></td> <td></td> </tr> </thead> <tbody> <tr> <td data-bbox="1502 426 1679 459">2021-22</td> <td data-bbox="1718 426 1863 459">264</td> <td data-bbox="1884 426 2021 459">865</td> <td data-bbox="2055 426 2192 459">47</td> <td data-bbox="2213 426 2376 459">22.18</td> </tr> <tr> <td data-bbox="1502 467 1679 500">2022-23</td> <td data-bbox="1718 467 1863 500">235</td> <td data-bbox="1884 467 2021 500">648</td> <td data-bbox="2055 467 2192 500">34</td> <td data-bbox="2213 467 2376 500">19.76</td> </tr> <tr> <td data-bbox="1502 508 1679 574">Variance</td> <td data-bbox="1718 508 1863 574">29 ↓</td> <td data-bbox="1884 508 2021 574">217 ↓</td> <td data-bbox="2055 508 2192 574">13 ↓</td> <td data-bbox="2213 508 2376 574">2.42 ↓</td> </tr> </tbody> </table> <p data-bbox="1502 624 2508 690">The amount spent on Special Appropriation Justifies in the decrease in the Fatal Accidents.</p> <p data-bbox="1502 731 2508 1128">The Other Expenditure includes the components of Price variation for an amount of Rs. 34.69 crores which raised due to variation of price on purchase of Materials. In the terms of purchase order, the prices will be stated as 'variable', which are fixed by taking a base price index for the raw material as per IEEMA Indices communicated monthly and specifies the price variation formula for calculating the amount of price variation admissible. After the completion of supply of materials as per purchase order the supplier will submit his claim for price variation, as the Proposal for Price Variation from suppliers were received after utilization of material for works and the same was capitalised. After capitalization it is not possible to apportion the price variation amount to materials.</p>			Financial Year	Fatal Accidents in Nos.		Non-Fatal Accidents	Exgratia Paid (Rs. in Crs.)		Human	Animal			2021-22	264	865	47	22.18	2022-23	235	648	34	19.76	Variance	29 ↓	217 ↓	13 ↓	2.42 ↓
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2.	<p data-bbox="297 1227 1389 1409">Compensation head is deviating to that much besides, DISCOM not voluntarily compensating for non complying Guaranteed SOP timelines, though directed for automatic payments as per Clause 13 of Electricity (Rights of Consumer) Rules 2020 and as per Clause 6 under Schedule II of Regulation 5 of 2016 Licensees StandardsofPerformance.</p> <p data-bbox="297 1417 1389 1470">Even DISCOMs failed to implement/adopt Clause 16(4)(b) of Electricity (Rights of Consumer) Rules 2020which reads as below</p>	<p data-bbox="1402 1227 2508 1293">The Compensations awarded by the Redressal Forum for non-compliance of SoP timelines were already paid by TSSPDCL.</p>																											

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	<p><i>"The distribution licensee shall publish the guaranteed standards of performance along with Compensation structure, information on procedure for filing of complaints, in the bills for month of January and July. If it is not possible to publish the same at the back of the bills, the distribution licensee shall publish it on a separate hand out and distribute it along with the bills."</i></p> <p>I have not seen any head related to consumer awareness activities. Do DISCOMs believe all consumes are well aware of their Rights and about DISCOMs?</p> <p>There is lot of scope to improve on consumer/customer service front at DISCOMS.</p>	
3.	<p>The consumer complaints reaching CGRFs and Vidyut Ombudsman is almost negligible when compared to DISCOMs consumer base. On average not even one (1) complaint a day is not registered voluntarily at FORUMs and not even one (1) appeal a week at Ombudsman.</p>	<p>The TSSPDCL has made a provision for registration of consumer Grievences through online portal of DISCOM's website in addition to the existing mode of registration of Grievences. The TSSPDCL is committed to provide better services to all consumers.</p>