

NORTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED



REPLIES TO
THE OBJECTIONS / SUGGESTIONS RAISED ON ARR & WHEELING
CHARGES PROPOSALS FOR DISTRIBUTION BUSINESS FOR THE
3RD CONTROL PERIOD AND ARR & TARIFF PROPOSALS FOR
RETAIL SUPPLY BUSINESS FOR FY 2015-16

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2015-16 సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు ప్రతిపాదిత ఛార్జీల పై శ్రీ కొత్తూ రి రాజుప్రదాన కార్యదర్శి, భారతీయ కిసాన్ సంఘ గారి

అభ్యంతరముల / సూచనలకు సమాధానములు

చిరునామ: # 5-72, ఏలేటి రామయ్య పల్లి (గ్రామం), నవాబుపేట (పోస్టు), చిట్యాల (మండలం), వరంగల్ జిల్లా - 506 356 తెలంగాణ రాష్ట్రం

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
1.	<p>దేశంలో ఎక్కువ శాతం ప్రజలు వ్యవసాయం పై ఆధారపడి జీవనం సాగిస్తున్న వారికి అన్ని సమస్యలతో పాటు విద్యుత్ సమస్యలు కూడా ఎక్కువగా ఉన్నవి రాత్రిపూట విద్యుత్ పంపిణి చేస్తే రైతులు చేనుకు నీరు ఎలా పారిస్తారు పాములు, విశపురుగులు, క్రూరజంతువుల వలన ప్రమాదాలు ఎక్కువగా జరిగే అవకాశం ఉంది. కావున సరఫరా ఉదయం నుండి సాయంకాలం వరకు మాత్రమే నాణ్యమైన, హెచ్చుతగ్గులు లేని నిరంతరాయంగా తప్పని సరిగా 7 గంటల విద్యుత్ సరఫరా చేయగలరని మనవి చేసుకుంటున్నాము.</p>	<p>విద్యుత్ సరఫరా మరియు డిమాండ్ కు మధ్య వ్యత్యాసం దృష్టిలో ఉంచుకొని విద్యుత్ వ్యవస్థను () సమర్థవంతంగా నిర్వహించుటకుగాను వ్యవసాయ విభాగానికి రోజుకు 6 నుండి 7 గంటల విద్యుత్ సరఫరాను రెండు పర్యాయాలుగా అందిస్తూ అందులో ఒక దఫా ఉదయం వేళలో అందించడం జరుగుతున్నది.</p>
2.	<p>సరఫరా సమయంలో L.C తీసుకుంటున్నారు. ఇది పదే పదే జరగడం వలన పారిన పోలమే పారుతున్నది. దయచేసి నివారించాలి. ప్రస్తుతం వ్యవసాయ శాఖ వారు వారి వద్ద రైతు యొక్క పేరు, చరవాణి, చిరునామా మొదలగు వివరాలు నమోదు చేసుకుని వారి యొక్క నంబరుకు మిస్ కాల్ ఇస్తే ఆయా మార్కెట్లో వివిధ వ్యవసాయ ఉత్పత్తుల ధరలను రైతులకు పంపిస్తున్నారు. ఇదే విధంగా దగ్గర్లోని రైతు వారి యొక్క పూర్తి వివరాలు నమోదు చేసుకుని ఒక మిస్ కాల్ ఇస్తే విద్యుత్ సరఫరా ఎప్పుడు పోతుందో వస్తుందో చరవాణికి సంబంధిత ఎక్స్ చేంజ్ నుండి వివరాలు పంపించాలి. తద్వారా రైతు విద్యుత్ కోసం ఎదురుచూడకుండా ఎప్పుడు వస్తుందో తెలుసుకొంటే తను పనులు చూసుకుంటాడు.</p>	<p>వ్యవసాయ విద్యుత్ సరఫరా సమయంలో ఎలాంటి LC ఇవ్వడం జరగదు. అత్యవసర పరిస్థితుల్లో మాత్రమే LC ఇవ్వడం జరుగుతుంది. ఏ వినియోగదారుడైనా టోల్ ఫ్రీ నెంబర్ 18004250028 ద్వారా తమ ఫిర్యాదు నమోదు చేసుకోవచ్చు. దీని పై పత్రికల ద్వారా విస్తృత ప్రచారం చేయడమైనది. సత్వర సేవలను వినియోగదారులకు అందించడానికి గాను 1,118 సిమ్ కార్డులను లైన్ మెన్ స్థాయి వరకు ఇచ్చి ఈ నంబర్లను గ్రామ పంచాయితీ కార్యాలయాలలో ప్రదర్శించబడినవి అలాగే వార్తా పత్రికలలో ప్రచురించబడినవి</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
3.	<p>ప్రస్తుతం చాలా వరకు AGL DTRలు Angularలపై ఎత్తుగా ఉన్నవి DTRలు కాళిపాయిని సమయంలో వాటిని వాహనాలల్లో దించడానికి chain pull అవసరం అవుతున్నది. ఈ chain pull సబ్ స్టేషన్లో లేవు కావున పైన ఉన్న DTRల నన్నింటిని (గద్దె) కట్టిం క్రిందకి పెట్టాలి లేదా సబ్ స్టేషన్లకు chain pull సరఫరా చేయాలి. లా DTRలు రంధ్రాలు పడి M-Seal పెట్టి ఉన్నవి వాటి ద్వారా oil కారుతున్నది. వీటి స్థానంలో కొత్తవి మార్చాలి oil వృధాని అరికట్టాలి మా చిట్కాల సబ్ స్టేషన్లో విద్యుత్ సిబ్బంది తక్కువగా ఉన్నారు. రైతులకు సరి అయిన సమయంలో సేవ చేయలకపోతున్నారు. దయచేసి సిబ్బందిని పూర్తి స్థాయిలో నియమించాలని BKS కోరుకుంటుంది.</p>	<p>కాళిపాయిని ట్రాన్స్ ఫార్మర్ స్థానంలో 48 గంటల వ్యవధిలో పని చేయు ట్రాన్స్ ఫార్మర్ ను అమర్చుట సంస్థ యొక్క బాధ్యత. సంస్థ వారు ఎప్పటికప్పుడు తనిఖీలను నిర్వహించి గుర్తించిన లోపాలను ఎప్పటికప్పుడు సరిచేయడం జరుగుతున్నది. ప్రభుత్వ ఆదేశాల మేరకు సంస్థ వారు ఎప్పటికప్పుడు క్షేత్ర సిబ్బందిని నియమించడం జరుగుతున్నది. సిబ్బంది కొరతను అధిగమించడానికి చిట్కాల మండలానికి ఇద్దరు తాత్కాలిక సిబ్బందిని నియమించడం జరిగినది.</p>
4.	<p>AGL DTRలకు సంబంధించి లగ్గులు, బుష్లు, కేబుల్స్ (cables) విద్యుత్ శాఖ రిపేర్ల నిమిత్తం సరఫరా చేస్తుందా లేదా? ఎందుకంటే మా AE గారు ADE గారు ఇవి సరఫరా లేవు, మీరు కొనుక్కోవాలి అంటున్నారు. మరి మేమే కొనుక్కోవాలా? చాలా DTRల cables కాళిపాయిని, వాటి స్థానంలో lock cover లేని aluminum cables వేస్తున్నారు ఇవి తొందరగా పాడవుతున్నవి. DTRల యొక్క on/off switchలు సరిచేసి, లేని వాటికి కొత్తగా బిగించాలి. ఏదైనా ప్రమాదం జరిగితే వెంటనే సరఫరా నిలిపివేసి ప్రమాదాన్ని చాలా వరకు నివారించవచ్చు. చాలా వరకు స్తంభాలు శిథిలావస్థలో ఉన్నవి, ప్రక్కకు ఒరిగినవి వాటి స్థానంలో కొత్తవి మార్చి ఒరిగినవాటిని నిటారుగా చేయాలి. చాలా వరకు తీగలు క్రిందకి ఉన్నవి వాటిని లాగి middle poles వేయాలి. ప్రమాదాలను నివారించాలి.</p>	<p>చెడిపోయిన డిస్ట్రి బ్యూఫస్ ట్రాన్స్ ఫార్మర్ ను నిర్ణీత సమయంలో మరమ్మతులు చేసి వినియోగదారునికి మెరుగైన సేవలను అందించుటకు లైసెన్స్ ఎప్పటికప్పుడు సమీక్షించుకొని తదనుగుణంగా చర్యను చేపట్టడం జరుగుతున్నది. రైతులను ఎలాంటి సామానులను కొనుక్కోమని చెప్పడం లేదు. AB switch లను ఎప్పటికప్పుడు మరమ్మతులు చేయడం జరుగుతున్నది. ఈ ఆర్డీక సంవత్సరంలో ఫిబ్రవరి 2015వరకు 6,797 AB switch లకు మరమ్మతులు చేయడం జరిగినది. ఈ FY 2014-15 సంవత్సరంలో ఫిబ్రవరి మాసం వరకు 4,177 Middle poles స్థాపించం జరిగింది. మొత్తం రూ.24 కోట్లతో ప్రతి</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
		విద్యుత్ సహాయక ఇంజనీర్ కార్యాలయ పరిధిలో సరాసరి 200 middle poles స్థాపించుటకు చర్యలు చేపట్టబ నవి.
5.	విద్యుత్ సిబ్బందికి సబ్ స్టేషన్ వద్దనే quarters నిర్మించి నిత్యం రైతులకు అందుబాటులో ఉండేలా చూడాలి సబ్ స్టేషన్లో వేలిముద్ర యంత్రం ద్వారా attendance తీసుకోవాలి. CGRF లను నెలకు ఒక సారి ప్రతి మండల కేంద్రంలో పెట్టాలి జిల్లా స్థాయి అధికారులందరూ విధిగా దీనిలో పాల్గొనాలి వీటిపై విస్తృత ప్రచారం చేయాలి. వీటి యొక్క వివరాలు విద్యార్థి దశనుంచే అర్థమయ్యేలా పాఠ్యంశాలో చేర్చాలి అసలు CGRF ఉంది అనే విషయం చదువురాని, చదువుకున్న, చాలా మంది ప్రజలకు తెలియదు. దీని గూర్చి విస్తృత ప్రచారం ముఖ్యంగా పల్లెల్లో చేపట్టాలి విద్యుత్ శాఖకు సంబంధించి పౌర సేవా పత్రం అమలు board లను విద్యుత్ కార్యాలయాల్లో మరియు జనం ఎక్కువగా ఉండే కుడల్లల్లో ఏర్పాటు చేసి రైతుల్లో ప్రజల్లో చైతన్యం తేవాలి.	డిస్కాం సిబ్బంది అందుబాటులో ఉంటూ 24 గంటలు నిరంతరంగా మరియు అత్యవసర పరిస్థితులలో విధులు నిర్వహించడం జరుగుతున్నది. CGRF సమావేశాలను ప్రతి నెల డివిజన్ స్థాయిలో నిర్వహించడం జరుగుతున్నది. విద్యుత్ శాఖకు సంబంధించి ప్రతి కార్యాలయం లో పౌర సేవా పత్రం అమలు board లను ఏర్పాటు చేయడం జరిగినది.
6.	విద్యుత్ హెచ్చు తగ్గుల వల్ల మోటార్లు కాలిపోతున్నాయి ఒక DTR కి ఎంత load ఉండాలో అంతే ఉంచి మిగతా ఎక్కువగా ఉన్న మోటార్లకు అదనపు DTR అమర్చాలి. Sanction లేని పంపు సెట్లకు నామ మాత్రపు ఫీజుతో క్రమబద్ధీకరించాలి	నాణ్యమైన విద్యుత్ ను అందించడానికి అధిక లోడు కలిగిన DTR లను గుర్తించి వాటి స్థానంలో అధిక సామర్థ్యం DTR లను అమర్చుట మరియు అదనపు DTR లను ఏర్పాటు చేయడం జరుగుతున్నది. 2014-15 సంవత్సరంలో 7,452 అదనపు DTR లను అమర్చడం జరిగినది మరియు 2,301 అధిక సామర్థ్యం గల DTR లను ఏర్పాటు చేయడమైనది.
7.	AGL DTR లు చాలా వరకు రైతుల యొక్క వ్యవసాయ భూములల్లో ఉన్నవి దాని క్రింద పంట	విద్యుత్ చట్టం ప్రకారం విద్యుత్ ట్రాన్స్ ఫార్మర్లు స్థాపించ

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	వేసి అవకాశం లేదు. నష్ట పోతున్న భూమికి (పంటకి) ఏమైనా నష్ట పరిహారం చేల్లిస్తారా? విద్యుత్ హెచ్చు తగ్గులను కొలవడానికి సిబ్బందికి meter లు ఇవ్వాలి. తరచుగా check చెయ్యాలి.	బడుచున్నవి. విద్యుత్ హెచ్చు తగ్గులను కొలవడానికి (Tong Tester) అను పరికరం అసిస్టెంట్ ఇంజనీర్ కార్యాలయం లో అందుబాటులో ఉన్నది.
8.	ఆరోగ్య శాఖకి సంబంధించి 108 అంబులెన్స్ మాదిరి విద్యుత్ శాఖకి కుడా call center పెట్టి రెండు DTR లను తీసుకువెళ్ళే vehicle మరియు 4 గురి సిబ్బంది 24/7 అందుబాటులో (substationలో) ఉండాలి. Call center phone చేస్తే 1 గంటలో DTR తీసుకు వచ్చి మరమ్మత్తు చేసే విధంగా ఉండాలి రెండు రోజులులు నీరు లేదంటే చాలా పంట నష్ట పోయే ప్రమాదం ఉంది.	కాలిపోయిన/ చెడిపోయిన DTR ను పట్టణ ప్రాంతాలలో 24 గంటలలోపు మరియు గ్రామీణ ప్రాంతాలలో 48 గంటలలోపు మార్చబడుచున్నవి.
9.	Earth pits House purpose and AGL సరిగ్గా లేవు ఇళ్ళలో షాక్ లు వస్తున్నవి ప్యాన్లు కాలిపోతున్నవి. DTR పాడవుతున్నవి. వీటిని సరిచేయాలి. అసలు earth pit అనేది ఎలా ఉండాలి అనగా - x వె లోతు అందులో ఏమి వెయ్యాలి దీని పై చాలా వరకు అవగాహన లేదు, దీనిని గూర్చి సిబ్బందికి వినియోగదారులకు తెలియపరచగలరు, అవగాహన కల్పించగలరు. చాలా poles యొక్క support cables తుప్ప పట్టి పాడైనవి. వీటిని సరిచేయాలి.	ఒక్కొక్క ట్రాన్స్ ఫార్మర్ కు రెండు GI లేదా CI పైపులు వేసి బెంటోనైట్ పాడర్ ఎర్త్ గుంతలలో నింపి మంచి ఎర్టింగ్ చేయడం జరుగుతున్నది. పాడైన ఎర్త్ లను తనిఖీ చేసి మార్చుటకు చర్యలు తీసుకోవడం జరుగుతున్నది. అర్జీదారుని దృష్టిలో ఏదైనా ఉన్నట్లయితే సంబంధిత సిబ్బందికి తెలియపరచినచో తగు చర్యలు తీసుకోవబడును మరియు DTR ల నిర్వహణ ఎర్టింగ్ గురించి సిబ్బందికి శిక్షణ ఇవ్వడం జరుగుతున్నది.
10.	విద్యుత్ పొదుపులో భాగంగా LED Bulbs 99% రాయితీతో వినియోగదారులందరికీ అందించాలి. వాటి యొక్క లాభాలు వివరించాలి. అలాగే 99% రాయితీతో విద్యుత్ పంపు సెట్లను solar అనుసంధానం చేయాలి. కనీసం విద్యుత్ ఆధాకి కెపాసిటర్లను ఉచితంగా అందించాలి.	ఇది ప్రభుత్వ విధానమైన నిర్ణయం లైసెన్స్ పరిధిలో లేని అంశము.

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11.	AGL SC నంబర్లు చాలా వరకు చాలా కాలం క్రితం భూమి అమ్మిన లేదా చనిపోయిన వారి పేరు మీద ఉన్నవి. వీటిని ప్రస్తుతం ఆ భూమి పై ఉన్న రైతు పేరు పై Department వారే మార్చాలి.	వినియోగదారుని పేరు మార్పు కొరకు సంబంధిత పత్రాలతో మరియు రుసుము చెల్లించి ఈ-సేవా కేంద్రంలో దరఖాస్తు చేసినచో తగు చర్య తీసుకోవబడును.
12.	బిల్లు బకాయి పూర్తిగా చెల్లించకుండా ఉంటే అనగా బిల్లు లో ఉన్న మొత్తం బిల్లు చెల్లించకపోతే (ఒక రూపాయి లేదా ఒకే పైసా ఉన్నా బాకీ) తదుపరి నెలలో 25 రూపాయలు అదనపు రుసుం వడ్డీ స్తున్నారని (పూర్తిగా చెల్లించనందుకు) ఇది ఎంతవరకు సమంజసం దీనిని సరి చేయగలరు.	ధరల ఉత్పన్నం అనుసరించి అపరాధ రుసుము వసూలు చేయడం జరుగుతున్నది.
13.	విద్యుత్ మోటార్ల బిల్లు లు చెల్లించమని అడగకుండా విద్యుత్ Bills చెల్లించాలని సరఫరా నిలిపి వేస్తున్నారు ఇది ఎంతవరకు సమంజసం ముందస్తు సమాచారం ఇవ్వాలి కదా? ఉదా: ఒక DTR పైన 15 పంపు సెట్లు ఉంటే 10 మంది రైతులు బిల్లు లు చెల్లిస్తే సరఫరా ఇవ్వకుండా మొత్తం అందరు చెల్లించాలి అప్పుడే సరఫరా ఇస్తాం అని సిబ్బంది అంటున్నారు ఇది సరియనది కాదు. దయచేసి ఒక వారం ముందు చాటింపు చేసి ఆ తర్వాత చర్యలు తీసుకోవాలి.	విద్యుత్ కస్టమర్ చార్జీ వినియోగదారుని పంపిణీ చేసిన తరువాతనే కస్టమర్ చార్జీ వసూలు చేయడం జరుగుతున్నది. విద్యుత్ కస్టమర్ చార్జీ చెల్లించని వినియోగదారునికి నిర్ణీత గడువు తదుపరి విద్యుత్ సరఫరా నిలిపివేయడం జరుగుతున్నది. విద్యుత్ బకాయిలు సకాలం లో చెల్లించి సంస్థకు సహకరించ గలరు.
14.	Housing కాని AGL కాని single phase DTR లను తీసివేయాలి. వీటి వలన చాలా వరకు ప్రమాదాలు జరుగుచున్నవి. Earth substation నుండి పంపిణీ చేయాలి.	విద్యుత్ సరఫరా మరియు డిమాండ్ కు మధ్య వ్యత్యాసం దృష్టిలో ఉంచుకొని గ్రామాలలో గృహ వినియోగానికి విద్యుత్ సరఫరా అందించుటకు సింగల్ ఫేజ్ ట్రాన్స్ ఫార్మర్లు ఏర్పాటు చేయబడినవి సబ్ స్టేషన్ నుండి ఎర్త్ వైర్ లాగడం అధిక మొత్తం లో ఖర్చుతో కూడుకొన్న పని. దఫాల వారిగా ఈ పనిని చేపట్టడం జరుగుతున్నది. ఇప్పటివరకు 137 కిలోమీటర్ల లైన్ లాగడం జరిగినది.

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
15.	విద్యుత్ connection ఉన్న ప్రతి రైతు పేరు మీద department 10 లక్షల ఉచితంగా ప్రమాద భీమ చేయించాలి. ఇది రైతు యొక్క కుటుంబానికి పశువులకు, ఎద్దులకు వర్తింప చేయాలి	లైసెన్స్ పరిధిలో లేని అంశము.
16.	విద్యుత్ సిబ్బందికి ఇచ్చే లంచాలతో రైతులు వేగలేకపోతున్నారు ప్రతి పనికి ఇంత రేటు అని దీనిని చట్టబద్ధం చేస్తారా?	సంబంధిత సిబ్బందిపై పై అధికారులకు ఫిర్యాదు చేయగలరు. క్రమ శిక్షణ చర్యలు తీసుకోవబడును.
17.	ప్రతిరోజు దిన పత్రికలల్లో ఏదో ఒక చోట విద్యుత్ ప్రమాదాలు జరుగుచున్నవి చాలా వరకు విద్యుత్ వృధా అవుచున్నది. కావున, విద్యుత్ కి సంబంధించిన అవగాహనా కార్యక్రమాలు, కలాజాతలు, వాల్ రైటింగ్, గోడ పత్రికలు, పంప్లెట్స్ లు వీటి ద్వారా మరియు ప్రసార మాధ్యమాల ద్వారా విస్తృత ప్రచారం కల్పించాలి. టీకీ ఎక్కువగా నిధులు వెచ్చిస్తే చాలా వడు ప్రమాదాలు నివారించవచ్చు. ముఖ్యంగా పల్లెల్లో ని పై ఎటువంటి అవగాహన కార్యక్రమాలు లేవు. ని పై సమగ్రంగా ఒకే booklet print చేసి ఉచితంగా పంపిణి చేయగలరని BKS విజ్ఞప్తి చేస్తున్నది	విద్యుత్ ఉప కేంద్రాల వారి కమిటీ సమావేశాలు మరియు రైతు చైతన్య యాత్రలు, కర పత్రాల ద్వారా విద్యుత్ ప్రమాదాల పై ప్రచారం చేయడం జరుగుతున్నది.
18.	DTR ల పై Toll Free No. వ్రాయాలి. ఆ DTR యొక్క పరిధిలో ఎన్ని టర్లు ఉన్నాయో SC Nos. యొక్క board ఏర్పాటు చేయాలి. ప్రతి pole వద్ద ఆ యొక్క SC No. వేయాలి. గ్రామాల్లో చాలా వరకు వీధి లైట్లు day అంతా వెలుగుతున్నాయి. వీటిని సరిచేయాలి.	వీధి దీపాల నిర్వహణ బాధ్యత స్థానిక సంస్థలకు సంబంధించినది. లైసెన్స్ పరిధి లో లేని అంశము. Toll Free No. విద్యుత్ బిల్లు పైన ముద్రించబడినది
19.	ధరల ప్రతిపాదనలు, ధరల ఉత్తర్వులే కాక ఇతర అన్ని రకాల ఉత్తరప్రత్యుత్తరాలు ఇతర వ్యవహారాలు రాష్ట్ర బాష అయిన తెలుగులోనే జరిపి మెజారిటీ వినియోగదారులకు అసౌకర్యం కలగకుండా చేయాలి.	ధరల ప్రతిపాదనల సంగ్రహమును మరియు అర్జీ దారుని అభ్యంతరాలకు సమాధానాలు తెలుగులో అందించడం జరుగుతున్నది.
20.	చిట్టాల గ్రామం పంచాయితీ పరిధిలోని ఏలేటి రామయ్య పల్లి గ్రామానికి 24 గంటల single phase విద్యుత్ సౌకర్యం ఇస్తామని అప్పటి CMD గారు పత్రికాముఖంగా చెప్పినారు. Linemen estimation	తగిన చర్యలు తీసుకోవబడును.

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	<p>వేసి పంపినారు ఇంతవరకు మాకు 24 గంటల విద్యుత్ ఇవ్వలేదు. దయచేసి Hamlet village అయిన మా గ్రామానికి నిరంతర విద్యుత్ అందించగలరు. అంతకు ముందు 2 రెండు నెలలకే ఒక సారి విద్యుత్ bills వారు. ఇప్పుడు 1 ఒక నెలకే bills స్తున్నారు ఎందుకు ఇలా నేలకే ఒక సారి bills స్తున్నారు పట్టణాల్లో మాదిరి గ్రామాలకు నిరంతర విద్యుత్ ఇవ్వాలి ఒకే billing ఉన్నప్పుడు ఈ వివక్ష ఎందుకు?</p>	
21.	<p>ERC వారు నిర్వహించే బహిరంగ విచారణలలో మాట్లాడే వారందరికీ అవకాశం ఇవ్వాలి రోజులు పోడిగించాలి.</p>	<p>గౌరవ కమీషన్ వారి పరిధిలోని అంశము.</p>
22.	<p>వ్యవసాయ రంగంలో నిర్మించే అన్ని DTRల ఫీడర్ల పనిని వేగవంతం చేయాలి. ఆలస్యం చేసిన కాంట్రాక్టర్లపై తగు చర్య తీసుకోవాలి. కొత్తగా వేసే DTR లు మరియు రిపేర్ చేసే DTR లకు సంబంధించి తత్సంబంధిత రైతులచే ఏ పనిని ఎంత కాలం చేసినారు. నికి అయిన అంచనా ఖర్చును కుడా రైతులకు తెలియచేసి వారితో దృవీకరణ చేసుకున్న తరువాతనే కాంట్రాక్టర్లకు చెల్లింపులు జరగాలని BKS కోరుకుంటుంది.</p>	<p>కాంట్రాక్టర్ లకు అప్పగించిన విద్యుత్ పనులు మొదలైనవి నిర్ణీత కాలవ్యవధిలో పూర్తి అయ్యే విధంగా తగు చర్యలు తీసుకోవబడుతున్న మరియు చెల్లింపులు నియమ నిబంధనలను అనుసరించి చేయడం జరుగుతున్నది. . రైతులు ఎలాంటి పనులు చేయనవసరం లేదు. ఒకవేళ ఏమైనా ఉంటే సంబంధిత అధికారుల దృష్టికి తీసుకు రాగలరు</p>
23.	<p>జాతీయ సంపద అయిన బొగ్గు, గ్యాస్ ప్రైవేట్ పరం చేయడానికి మేము వ్యతిరేకం వాటి వాడకాన్ని వాటి ధరలను సమీక్షించడానికి అఖిల బారత స్థాయిలో బహిరంగ విచారణలు జరపాలి. వాటిని నియంత్రించకుండా పెరిగే విద్యుత్ ధరలను నియంత్రించ లేము. జల విద్యుత్ మరియు గ్యాస్ అధారిత విద్యుత్ ప్రాజెక్ట్ లపై నిర్మాణ ఖర్చులపై కుడా బహిరంగ విచారణ సమీక్షించాలి. దానితో విచ్చల విడిగా చేసే చెల్లింపులను నియంత్రించి తద్వారా ఫిక్స్డ్ ఛార్జీలను తగ్గించవచ్చు సాంప్రదాయతర విద్యుత్ను ప్రోత్సహించాలని వేడుకొంటున్నాము.</p>	<p>సౌర విద్యుత్ ఉత్పత్తిని ప్రోత్సహించే క్రమంలో, ప్రభుత్వం సౌర విద్యుత్ విధానాన్ని జారి చేసింది మరియు భవనాల పైకప్పు పై నెలకొల్పే 3 KW నుండి 500 KW సౌర విద్యుత్ వ్యవస్థ ఎర్పాటునకై 20% రాష్ట్ర ప్రభుత్వం సబ్సిడీని ప్రకటించడం జరిగింది మరియు 30% కేంద్ర ప్రభుత్వం సబ్సిడీని ప్రకటించడం జరిగింది. ఇప్పటివరకు సంస్థ పరిధిలో 300 KW భవనాల పై</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
		<p>కప్ప పై సౌర విద్యుత్ వ్యవస్థను ఏర్పాటు చేసి నెట్ మీటర్లను బిగించడమైనది. సంస్థ పరిధిలో 21 MW సౌర విద్యుత్ వ్యవస్థలను నెలకొల్పబడినవి. 45 MW సౌర విద్యుత్ కొనుగోలుకు ఒప్పందాలు అమలులో ఉన్నవి. ఇంకా 22 MW సౌర విద్యుత్ కొనుగోలుకు ఒప్పందాలు జరుగుచున్నవి.</p>
24.	<p>విద్యుత్ బిల్లు లు కట్టడం సామాన్యనికి భారంగా ఉన్నది 200 యూనిట్ల వరకు బిల్లు లను పెంచవద్దని మనవి చేస్తున్నాము</p>	<p>గృహ వినియోగదారులకు నెలకు 100 యూనిట్ల వరకు దరల పెంపును ప్రతిపాదించలేదు మరియు 100 యూనిట్ల పై 200 యూనిట్ల వరకు వినియోగించే వినియోగదారులకు కేవలం 4% నామ మాత్రపు పెంపును ప్రతిపాదించడమైనది.</p>

2015-16 సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు ప్రతిపాదిత ఛార్జీల పై కోడెల సమ్మయ్య, జిల్లా అధ్యక్షులు భారతీయ కిసాన్ సంఘ్ గారి

అభ్యంతరముల / సూచనలకు సమాధానములు

చిరునామ: చిట్యాల (పోస్టు), చిట్యాల (మండలం), వరంగల్ జిల్లా - 506 356 తెలంగాణ రాష్ట్రం

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
1.	చాలా మంది రైతులు విద్యుత్ కనెక్షన్ల కొరకు DDలు కట్టినారు, ఇంతవరకు కనెక్షన్ ఇవ్వలేదు. కారణాలు ఎంటి? ఎప్పుడు ఇస్తారు?	DD లు కట్టిన వినియోగదారులకు విద్యుత్ కనెక్షన్లను ఇవ్వడం జరిగింది.
2.	Substationలో (Chityala) ఫీడర్ మార్చే blades మంటలు వచ్చి పాడైనవి. వీటి గురించి నిజామాబాద్, కరీంనగర్, వరంగల్ ERC లో చెప్పటం జరిగింది. ఇంట వరకు సరిచేయలేదు. కారణం.	చిట్యాల ఫీడర్ బ్లేడ్లను మార్చడం జరిగినది
3.	వ్యవసాయ విద్యుత్ నిరంతరం 7 గంటలు పగటి పూట ఇవ్వాలి. ఈ రాత్రి కరెంట్ వల్ల చిట్యాల మండల గోపాలపూర్ రైతు విద్యుత్ ఘాతం వల్ల మరణించినాడు. ఇంతవరకు అతనికి నష్టపరిహారం ఇవ్వలేదు. ఇలా ఎంతమంది రైతులు చనిపోవాలి.	విద్యుత్ సరఫరా మరియు డిమాండ్ కు మధ్య వ్యత్యాసం దృష్టిలో ఉంచుకొని విద్యుత్ వ్యవస్థను () సమర్థవంతంగా నిర్వహించుటకు వ్యవసాయ విభాగానికి రోజు 6 నుండి 7 గంటల విద్యుత్ సరఫరాను రెండు పర్యాయాలుగా అందిస్తూ అందులో ఒక దఫా ఉదయం వేళలో అందించడం జరుగుతున్నది. ఈ సంఘటన ఒక నెల క్రితం జరిగినది కానీ పంచనామా మరియు FIR కాపీలు ఇంట వరకు అందలేదు. ఈ పత్రాలు సమర్పిస్తే ఎక్స్ గ్రేషియా వెంటనే మంజూరు చేయబడును.
4.	AGL DTR లకు on/off switches ఏర్పాటు చేయాలి.	AGL DTR లకు AB స్విచ్లు ఏర్పాటు చేయబడుచున్నవి.
5.	Substation లోగాని DTR లకు గాని మైనర్ వస్తు వులు రైతులే తెచ్చుకోవాలి	చెడి పోయిన ట్రాన్స్ ఫార్మర్ విభాగాలను ఎప్పటికప్పుడు గుర్తించి వాటికి

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	అంటున్నారు మా AE గారు మీ నుండి వస్తువులు ఎందుకు ఇవ్వరు?	మరమ్మత్తులు చేయడం జరుగుచున్నది సామానులు సంస్థయే సమకూర్చుతుంది.
6.	మండలంలోని చాలా గ్రామాలల్లో earth pits సరిగ్గా లేక ఇళ్ళకు షాక్ వచ్చి bulbs fans కలిపిపోతున్నవి, దయచేసి earth సరి చేయగలరు.	ఒక్కొక్క ట్రాన్స్ ఫార్మర్ కు రెండు GI లేదా CI పైపులు వేసి బెంట్ నైట్ ఫాడర్ ఎర్త్ గుంతలలో నింపి మంచి ఎర్డింగ్ చేయడం జరుగుతున్నది. పాడైన ఎర్త్ లను తనిఖి చేసి మార్పుటకు చర్యలు తీసుకోవడం జరుగుతున్నది.
7.	పాత poles, cables స్థానంలో కొత్తవి మార్చాలి. Aluminum cable తెగితే దానికి పట్టే (అతకడానికి) cable రైతులే కొనుక్కోవాలి అంటున్నారు. మీరు ఇవ్వరా? కారణం?	పాడైన పోల్స్ & కేబుల్స్ స్థానంలో కొత్తవి మార్పుటకు సంస్థా పరంగా తగిన చర్యలు తీసుకోవడం జరుగుతున్నది.
8.	Jookal మున్నూరు కాపు ఆఫీసు వద్ద ఒక pole చాలా వరకు వంగి ఉన్నది. గురించి AE దృష్టికి తీసుకువచ్చిన సరిచేయలేదు దయచేసి దీనిని సరిచేసి విద్యుత్ ప్రమాదాన్ని నివారించగలరు.	ఇట్టి పోల్ ను 07.03.2015 రోజున సరి చేయడమైనది అని గమనించ గలరు.
9.	ALM లకు నెల నెల జీతాలు ఇవ్వడం లేదు. పని చేయించుకుంటున్నారు. వాళ్ళ జీవనం ఎలా?	ALM లకు ప్రతీ నెలా 1వ తేదీన జీతాలు వారి ఖాతాలోకి జమ చేయబడుచున్నవి.
10.	మా AE గారు స్థానికంగా ఉండడం లేదు. ఉన్నా పని చేయడం లేదు. నివాసం Hyderabad లో Job Chityala లో దయచేసి AE మార్చండి.	A.E గారు చిట్యాలలో # 3-102, గల ఎస్. రాజేశ్వర్ రావు గారి ఇంటిలో కిరాయికి ఉంటు స్థానికంగా సేవలు అందిస్తున్నాడు
11.	ప్రతి substationలో chain pull ఉండాలి. DTR దించడానికి రైతులకు ని కిరాయి రోజుకు 50 రూపాయలు ఖర్చు అవుతున్నవి.	Chain pulley ప్రతీ సెక్షన్ ఆఫీసులో ఉన్నది.

ప్రతి సెక్షన్ కార్యాలయంలో వ్యవసాయ బావుల ఆర్డీలను జ్యేష్ఠత (seniority) ప్రకారం మంజూరు చేయడం జరుగుతుంది. ప్రభుత్వ వ్యవసాయ బావుల కనెక్షన్ల లక్ష్యంకు (target) అనుగుణంగా మరియు సెక్షన్ కార్యాలయంలో ఉన్న వ్యవసాయ బావుల జ్యేష్ఠత (seniority) ఆధారంగా సర్వీసును మంజూరు చేయడం జరుగుతుంది.

విద్యుత్ సరఫరా మరియు డిమాండ్ కు మధ్య వ్యత్యాసం దృష్టిలో ఉంచుకొని విద్యుత్ వ్యవస్థను () సమర్థవంతంగా నిర్వహించుటకుగాను వ్యవసాయ విభాగానికి రోజుకు 6 నుండి 7 గంటల విద్యుత్ సరఫరాను రెండు పర్యాయాలుగా అందిస్తూ అందులో ఒక దఫా ఉదయం వేళలో అందించడం జరుగుతుంది

DTR లన్నిటికీ AB switch లను ఏర్పాటు చేయడం జరుగుతుంది.

2015-16 సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు ప్రతిపాదిత ఛార్జీల పై కూర సురేందర్ రెడ్డి మండల అధ్యక్షులు, భారతీయ కిసాన్

సంఘ్ గారి అభ్యంతరముల / సూచనలకు సమాధానములు

చిరునామ: ఏలేటి రామయ్య పల్లి (గ్రామం), చిట్యాల (పోస్టు), చిట్యాల (మండలం), వరంగల్ జిల్లా - 506 356 తెలంగాణ రాష్ట్రం

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
1.	<p>వ్యవసాయానికి విద్యుత్ 7 గంటలు day time లో ఇవ్వాలి. విద్యుత్ సిబ్బందిని పెంచాలి. DTR లన్నిటికీ on/off switch లు ఏర్పాటు చేయాలి. విద్యుత్ హెచ్చు తగ్గుల మరియు అధిక లోడు నివారణకు కొత్త DTR లను ఏర్పాటు చేయాలి.</p>	<p>విద్యుత్ సరఫరా మరియు డిమాండ్ కు మధ్య వ్యత్యాసం దృష్టిలో ఉంచుకొని విద్యుత్ వ్యవస్థను () సమర్థవంతంగా నిర్వహించుటకుగాను వ్యవసాయ విభాగానికి రోజుకు 6 నుండి 7 గంటల విద్యుత్ సరఫరాను రెండు పర్యాయాలుగా అందిస్తూ అందులో ఒక దఫా ఉదయం వేళలో అందించడం జరుగుచున్నది.</p> <p>DTR లన్నిటికీ AB switch లను ఏర్పాటు చేయడం జరుగుచున్నది. 12,000 కొత్త AB స్విచ్చులను అందుబాటులో ఉంచబడినది.</p> <p>ఎప్పటికప్పుడు అధిక లోడు DTR లను గుర్తించి అందుకు అదనపు DTR లు ఏర్పాటు చేయడం జరుగుచున్నది. ఈ ఆర్థిక సంవత్సరంలో అధిక లోడు గల DTR లను గుర్తించి 2,301 అధిక సామర్థ్యం గల DTR లను ఏర్పాటు చేయడమైనది. ఇవే కాక అదనంగా 7,452 నూతన DTR లను అమర్చడం జరిగినది.</p>

A - గ్రూప్ : అభ్యంతరముల / సూచనలకు సమాధానములు

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
1.	<p>వినియోగదారుల సంక్షేమ, రక్షణ దృష్ట్యా మనవి చేయునది ఏమనగా, నార్తర్న్ పవర్ డిస్ట్రిబ్యూషన్ కంపెనీ లిమిటెడ్ పరిధిలో విద్యుత్ చార్జీల పెంపుదల ప్రతిపాదనల పై అభిప్రాయ సేకరణ నిమిత్తము వరంగల్ జిల్లా కేంద్రములోని జిల్లా పరిషత్ తేది 2-03-2015 రోజున జరుగు కార్యక్రమములో పాల్గొనుట గురించి అనుమతించగలరు విద్యుత్ చార్జీల పెంపుదల పై స్వయముగా అభిప్రాయములు, అభ్యంతరాలను మీ ముందు తెలుపుట గురించి మనవి చేయడమైనది.</p>	<p>గౌరవ కమీషన్ వారి పరిధి లోని అంశము.</p>

2015-16 సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు ప్రతిపాదిత ఛార్జీల పై శ్రీ సామల తిరుపతి, గారి

అభ్యంతరముల / సూచనలకు సమాధానములు

చిరునామ: రేగొండ (మండలం), వరంగల్ (జిల్లా), తెలంగాణ రాష్ట్రం

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
1.	<p>మాకు గల వ్యవసాయ భూమిలో గత 20 సంవత్సరములుగా 5 విద్యుత్ స్తంభాలు, ఒకటి ట్రాన్స్‌ఫార్మర్ ఉన్నవి. ఇవి రెండు గుంటలకు పైగా భూమిలో ఉన్నాయి.</p> <ul style="list-style-type: none"> • అట్టి భూమిలో ఎటువంటి పంట వేయడం లేదు మరియు ట్రాన్స్‌ఫార్మర్ మార్చిన సమయంలో వచ్చు వాహనం వలన పంట నష్టం జరుగుచున్నది. • మాకు కలుగుతున్న ఈ నష్టానికి పరిహారం ఎందుకు చెల్లించడం లేదు? ఎవరు చెల్లిస్తారో తెలుపగలరు? ఎవరికీ మేము దరఖాస్తు చేయాలి? 	<p>చట్టం ప్రకారం విద్యుత్ స్తంభాలు మరియు ట్రాన్స్ ఫార్మర్లు స్థాపించబడినవి.</p>
2.	<p>గ్రామాలలో ఏర్పాటు చేస్తున్న విద్యుత్ దీపాలకు on/off ఏ విధంగా ఏర్పాటు చేయాలని నిబంధన ఉన్నదో తెలుపగలరు? ప్రతి వీధి దీపానికి ఒక on/off ఏర్పాటు చేస్తారా? లేక అన్నిటికీ కలిపి ఒక on/off ఏర్పాటు చేయాలని నిబంధన ఉందా? కొన్ని చోట్ల నేను గమనించాను 24 గంటలు వీధి దీపాలు వెలుగుతూనే ఉన్నాయి. వాటిని నేరుగా on/off లేకుండా ఏర్పాటు చేశారు.</p>	<p>వీధి దీపాలను నిర్వహించు భాద్యత స్థానిక సంస్థలకు సంబంధించినది.</p>
3.	<p>మీరు కరెంట్ పొదుపు చర్యల కొరకు మండల కేంద్రాలలో ఎటువంటి ప్రచారాలు చేయిస్తున్నారు వాటికి పొదుపు చర్యల కొరకు మండల కేంద్రాలలో ఎటువంటి ప్రచారాలు చేయిస్తున్నారు వాటికి ఎంత ఖర్చు పెడుతున్నారో తెలుపగలరు?</p>	<p>వినియోగదారు విద్యుత్ బిల్లులపై విద్యుత్ పరిరక్షణ నినాదాలు ముద్రించడం. సబ్-స్టేషన్ కమిటీ సభలు, రైతు చైతన్య యాత్రలు, కర పత్రాల పంపిణీ ద్వారా పొదుపు చర్యలను ప్రచారం చేయబడుతున్నది.</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
4.	వ్యవసాయ బావులకు ఒకొక్కసారి half కరెంట్ రావడం వలన మోటారు పంపులకు కాలిపోవుచున్నవి. దీని వలన పంట నష్టం మరియు ఆర్థిక నష్టం జరుగుతున్నవి? దీని పరిహారం ఎవరు చెల్లిస్తారు?	వ్యవసాయ వినియోగదారులకు నాణ్యమైన విద్యుత్ అందించుటకు లైసెన్స్ తగు చర్యలు తీసుకోవడం జరుగుతున్నది.
5.	రాత్రి పూట కరెంటు ఇవ్వడం వలన రైతులకు చాలా ఇబ్బంది కలుగుచున్నది. కావున పగటి పూట మాత్రమే కరెంటు ఇవ్వగలరు.	విద్యుత్ సరఫరా మరియు డిమాండ్ కు మధ్య వ్యత్యాసం దృష్టిలో ఉంచుకొని విద్యుత్ వ్యవస్థను () సమర్థవంతంగా నిర్వహించుటకుగాను వ్యవసాయ విభాగానికి రోజుకు 6 నుండి 7 గంటల విద్యుత్ సరఫరాను రెండు పర్యాయాలుగా అందిస్తూ అందులో ఒక దఫా ఉదయం వేళలో అందించడం జరుగుతున్నది.
6.	వ్యక్తిగతంగా మాట్లా డూనికి కొంత సమయం ఇవ్వగలరని కోరుచున్నాము.	గౌరవ కమీషన్ పరిధిలోని అంశం.

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 Telanagana Textiles and Spinning Mills Association, Surya Towers, First Floor, Sardar Patel Road, Secunderabad-500003, Telangana

Sl.No	Summary of Objections / Suggestions	Response of the Licensee
1	<p>3 NON ADHERENCE TO MYT PRINCIPLES</p> <p>As per the Regulation (1) 8 of the Andhra Pradesh Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff for Wheeling and Retail Sale of Electricity) Regulation, 2005 (herein after referred to as the 'Tariff Regulations'), the term "Control Period" is defined as follows:</p> <p><i>"Control Period" means a multi-year period fixed by the Commission from time to time, usually 5 years, for which the principles for determination of revenue requirement will be fixed, the first Control Period, however, being of the duration of 3 years"</i></p> <p>Pursuant to the approval of the Tariff Regulations, the first control period for the block of financial years 2005-06 to 2007-08 and the second control period for the block of financial years 2009-10 to 2013-14 have ended.</p> <p>The erstwhile Regulatory Commission, while passing the Tariff Order for FY 2009-10 had made the following observations at Paragraph No.2:</p> <p><i>"2 The Andhra Pradesh Electricity Regulatory Commission (APERC or Commission), to determine the tariff for wheeling and retail sale of electricity u/s 62 of the Electricity Act 2003(Act), notified on 14.11.2005, the</i></p>	<p>TSNPDCL has been following the MYT scheme for distribution business for the 2nd Control period i.e. 2009-10 to 2013-14 and also for 3rd control period as per clause-6 of the Regulation 4 of 2005. The distribution Licensee could not file the ARR for retail supply business for the entire control period due to significant uncertainty prevalent on the availability of energy and the cost of power purchase for 3rd Control period. There was uncertainty in commissioning dates of the GENCO Stations, central generating stations, and other generating stations.</p> <p>Hon'ble State Commission by its order dated 15.12.2014 has granted permission for the TS discoms to file ARR annually for the FY 2015-16 in terms of its conduct of business regulations.</p> <p>It is pertinent to mention here that the Hon'ble APTEL in Appeal No.126 & 159 of 2012 filed by AP Ferro Alloys association against the APERC tariff Order for FY 2012, upheld the decision of the Hon Commission vide its order dated 04th September 2013 at para 17 of the order and the same is produced below: <u>"Admittedly, as per the Regulations, the State Commission has powers to allow the filing of ARR/tariff proposal for retail supply business on annual basis and the State Commission has exercised its power after considering the reasons given by the Distribution Licensees and passed reasoned order granting</u></p>

APERC (Terms and Conditions for Determination of Tariff for Wheeling and Retail Sale of Electricity) Regulation, 2005. (Regulation 4 of 2005). As per this Regulation 4 of 2005, each distribution Licensee has to make the filings for determination of tariff for a) Wheeling (Wheeling Tariff henceforth) and b) Retail Sale of Electricity (Retail Supply Tariff henceforth) for Multi Year Tariff (MYT) Control Period of 5 years from 2009-10 to 2013-14(Control Period henceforth).”

Filings for Determination of Wheeling and Retail Supply Tariff

3. The Licensees submitted the Aggregate Revenue Requirement (ARR) of distribution and retail supply businesses for determination of the wheeling and retail supply tariffs, on 29.11.2008. The Licensees made filings for determination of wheeling tariff for the Control Period as envisaged in the Regulation 4 of 2005. The Licensees requested for permission to file retail supply tariff filings for one year, i.e. 2009-10(instead of five years) only, in view of certain policy uncertainties and pending tariff fixation for few generating stations, with which reasonable prediction cannot be made for five years. The Licensees’ request to file the retail supply tariff proposals for one year, i.e.FY2009-10 has been accepted and accordingly, the Licensees filed the application for determination of retail supply tariff for FY 2009-10.”

the permission which is perfectly legal”.

Subsequently, for the third control period, the Hon'ble Commission has again granted permission to the distribution licensees to file ARR and Tariff on single year basis.

It may be true that the Hon'ble Commission may have powers to relax any provision of the Tariff Regulations. However, the very purpose of introducing the Multi Year Tariff Regulatory Framework is to bring certainty and predictability as stated in the Tariff Policy:

“8.1 Implementation of Multi-Year Tariff (MYT) framework

1) This would minimise risks for utilities and consumers, promote efficiency and appropriate reduction of system losses and attract investments and would also bring greater predictability to consumer tariffs on the whole by restricting tariff adjustments to known indicators on power purchase prices and inflation indices. The framework should be applied for both public and private utilities. (Emphasis Supplied)

Hence, the Petition is opposed to the Tariff Regulations and the Tariff Policy and is liable to be rejected, *in limine*.

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

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

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

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

4 TRUING UP OF ARR FOR SECOND CONTROL PERIOD

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

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

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

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

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

TSNPDCL has claimed the Gains/losses upto the Year 2012-13 as per the FRP. The retail true up of the FY 2013-14 also claimed in these filings.

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

5 ORDER ON GENERATION TARIFFS IS STILL PENDING

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

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

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

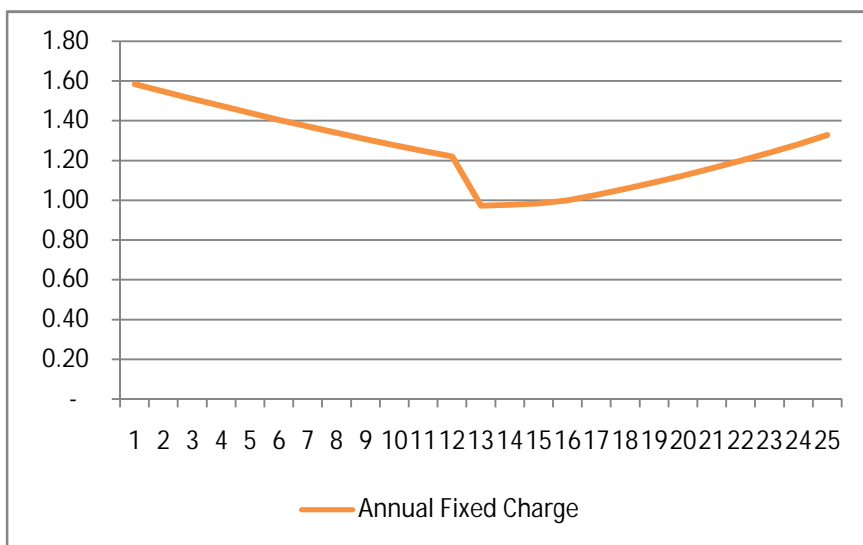
The fixed costs for a power station in cost plus tariff models typically fall year on year in the initial years. This is because the return on capital employed (interest on long term loan) would fall year on year as long term loan gets repaid. After the loan is fully repaid, there is a marked drop in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

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

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

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

Graph: Typical Annual Fixed Charges in a Cost Plus Model



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

<p style="text-align: center;">6 SHARING OF GAINS AND LOSSES ON VARIATIONS IN “CONTROLLABLE” ITEMS OF ARR</p> <p>Regulation 10.6 of the Tariff Regulations provides that <i>“the Distribution Licensee in its annual filings during the Control Period shall present gains and losses for each controllable item of the Aggregate Revenue Requirement. A statement of gain and loss against each controllable item will be presented after adjusting for any variations on account of uncontrollable factors”</i>.</p> <p>It is submitted that the Licensee has not provided such statement which was required by the Tariff Regulations.</p> <p>It is prayed that the Hon’ble Commission may direct the Licensee to submit such statement and opportunity may be provided to the Objector / consumers to provide comments on such submissions. Further it is submitted that the deviations should be approved and gains and losses should be shared with the consumers on a yearly basis.</p>	<p>The 10.7 of the Regulation 4 of 2005 reads as under <i>“For the purpose of sharing gains and losses with the consumers, only aggregate gains or losses for the Control Period as a whole will be considered. The Commission will review the gains and losses for each item of the ARR and make appropriate adjustments wherever required: Provided that for the first Control Period, insofar as the gains and losses from the Retail Supply Business of the Distribution Licensee are concerned, these will be shared with the consumers on yearly basis”</i></p> <p>Accordingly, DISCOM has furnished the information related to deviation in the controllable items in the ARR for the second control period along with detailed reasons.</p>
<p style="text-align: center;">7 COST TO SERVE METHODOLOGY</p> <p>With regard to the cost of serve methodology, the Petitioner has proposed the following:</p> <p><i>“The Hon’ble commission has been adopting Embedded Cost of Service method for determining the category wise CoS and Tariff. In determination of category wise Tariff for FY 2015-16, the licensee observed that Cost of Service of a category under existing Embedded CoS method and with ±20% is not commensurate with the proposed tariffs of certain categories. The licensee did not face this issue in the previous years as there were no major tariff</i></p>	<p>Licensee has calculated CoS based on embedded CoS method only.</p> <p>However, Hon'ble Commission was requested to adopt average cost of supply as per the NTP while fixation of tariffs for each category. As Clause 8.3.2 of National Tariff Policy states that “For achieving the objective that the tariff progressively reflects the cost of supply of electricity, the SERC would notify roadmap within six months with a target that latest by the end of year 2010-2011 tariffs are within ± 20 % of the average cost of</p>

revisions proposed by the Licensee.

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

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

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

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

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

- Departure from the Embedded CoS method for calculating CoS of a category;
- The tariff proposals made by the licensee is not commensurate with the "CoS ± 20 % limit" which refers to

supply. The road map would also have intermediate milestones, based on the approach of a gradual reduction in cross subsidy"

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

the issue of cross-subsidy.

- Proposal to the Hon'ble Commission to determine the tariff based on average CoS and not category wise CoS.

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

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

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

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

	<p>Following are the tests for deciding the tariff in compliance of the Electricity Act, 2003 Tariff Policy and Regulations of the Commission:</p> <ul style="list-style-type: none"> • The Cost of service for each category of consumer will have to be worked out separately. • The cross subsidy should be going down from year to year. • Tariff need not be a mirror image of cost to supply to the respective consumer categories. • Tariff for different categories of consumers are differentiated only according to the factors give in Section 62(3). • There should be no tariff shock to any category of consumer. 	
	<p>8 CROSS SUBSIDY</p> <p>There is no mention of the definition of the term 'cross subsidy' anywhere in the Tariff Policy, National Electricity Policy or in the Electricity Act, 2003. Section 61(g) of the Electricity Act, 2003 provides that the tariff should progressively reflect the cost of supply of electricity and cross subsidies should be reduced in the manner specified by State Commission. This shows that there is a mandate that tariff should progressively reflect actual cost of supply for each consumer category and not average cost of supply.</p>	<p>With regard to the comparison of CoS w.r.t. the Tariff, it is to inform that the tariff need not be the mirror image of actual cost of supply or voltage-wise cost of supply.</p> <p>The Hon Tribunal in various appeals held as under “However, we are not suggesting that the tariffs should have been fixed as mirror image of actual cost of supply or voltage-wise cost of supply or that the cross subsidy with respect to voltage-wise cost of supply should have been within ±20% of the cost of supply at the respective voltage of supply.</p>

Clause 8.3 of the Tariff Policy provides:

“8.3 Tariff Design: Linkage of tariffs to cost of service

It has been widely recognised that rational and economic pricing of electricity can be one of the major tools for energy conservation and sustainable use of ground water resources.

In terms of the Section 61 (g) of the Act, the Appropriate Commission shall be guided by the objective that the tariff progressively reflects the efficient and prudent cost of supply of electricity.

....

Accordingly, the following principles would be adopted:

1.....

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

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

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

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

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

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

the Hon'ble Commission.

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

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

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

9 STATE GOVERNMENT SUBSIDY

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

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

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

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

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

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

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

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

It is pertinent to mention here that there will be always change in sales mix in almost all the categories and thus there will be always changing in revenue. In view of this the discom is claiming

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

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

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

Consumer Categories	Energy Sales	Approved CoS	Cost to Serve	Estimated Revenue Assessment	Subsidy Requirement
	MU	Rs/kWh	Rs Crore	Rs Crore	Rs Crore
	A	B	$C = A \times B / 10$	D	$E = C - D$
LT- I(A) Domestic - upto 50 units/month	571.24	6.73	384.44	145.82	238.62
LT- I(B) Domestic - >50 and upto 100 units/month	809.21	6.73	544.60	172.80	371.80
LT- I(C) Domestic-	705.40	6.73	474.73	222.02	252.71

above 100 & upto 200 units/month					
LT-V	4715.21	4.87	2296.31	37.43	2258.88
Total	6801.06		3700.08	578.07	3122.01

Thus, the total subsidy requirement from State Govt. towards supply to select sub-categories of LT-1 and LT-V is to the tune of apprx Rs. 4511.19 crore for TSNPDCL as depicted in the table below:

Table: Additional Subsidy Requirement from State Government for TSNPDCL

(Figures in Rs Crore)

Particulars	FY 2013-14	FY 2014-15	FY 2015-16
Subsidy Requirement of LT-1	802.30	863.14	1026.46
Subsidy Requirement of LT-V	2088.11	2258.88	3167.86
Total Subsidy Requirement	2890.41	3122.01	4194.32
Less: Subsidy from State Govt.	2555.28	3140.27	-
Additional Subsidy Requirement from State Govt.	335.13	-18.26	4194.32
Total Additional Subsidy Requirement from State Govt.	4511.19		

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

Similar principle has been adopted by the Hon'ble Uttar Pradesh Electricity Regulatory Commission (UPERC) in its Order dated 21st May, 2013 in Petition No. 809 of 2012 while truing up the ARR for FY 2007-08 in respect of the distribution licensees of Uttar Pradesh namely Dakshinanchal Vidyut Vitran Nigam Limited, Madhyanchal Vidyut Vitran Nigam Limited, Paschimanchal Vidyut Vitran Nigam Limited and Purvanchal Vidyut Vitran Nigam Limited.

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

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

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

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

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

Keeping in view the above submissions, figures and the relevant observations of the Appellate Tribunal and other Regulatory Commissions, **it is very clear that for any additional sale to the subsidised consumers the government has to release**

additional subsidy. The Hon'ble Commission itself has stated this in its orders but failed to implement it by seeking additional subsidy. The Objector strongly urges the Hon'ble Commission to direct the State Government to release the additional subsidy required by the Licensee for sale of additional power to agriculture consumers and other subsidised categories during the previous control periods.

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

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

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

Licensee's Response: *The Licensee has been requesting the Hon'ble Commission for the last two years to consider the truing up of actual agriculture sales and distribution Losses. The Discom has also filed during the year 2013-14, that the actual agricultural sales have been*

much higher than the approved sales and the additional power requirement due to higher losses and additional agricultural sales will have to be purchased at a marginal cost of Rs. 10.00/Unit or as applicable by the licensee. The above cost is not been considered/ captured while determining the FSA due to non inclusion of cost in formula as per the existing regulation. Similarly, Regulation 4 of 2005 does not cover the mechanism to recover additional cost incurred by the Licensee. By not recognizing this huge cost by the Hon'ble Commission, Licensees are losing around 10 times of their current Return of Equity. In light of the above, Licensee requested the Hon'ble Commission to devise an appropriate mechanism to recover the additional cost either through FSA or true-up mechanism.

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

(Emphasis supplied)

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

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

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

Thus, in order to summarise:

- The Hon'ble Commission should re-adjust the level of subsidy from State Govt. based on actual consumption levels such that the cost of supplying subsidised power to select consumer categories is not borne by the subsidising consumers in terms of the true up of the revenue gap of FY 2013-14 and FY 2014-15.
- The additional subsidy requirement from the State Govt. towards subsidised power supply to select sub-categories of LT-1 and LT-V is to the tune of approx Rs. 335.13 crore in FY 2013-14 and Rs. 4194.32 crore in FY 2015-16 in respect of TSNPDCL.
- This ratio applies to all the previous years under the second control period i.e., from FY 2009-10 to 2012-13. It is urged that the Hon'ble Commission determine the additional subsidy requirement from State Govt. for supply of electricity to subsidised categories based on actual consumption of subsidised categories for all the years covered under the Tariff Regulations.
- There is precedence of this treatment in terms of the UPERC Order dated 21st May, 2013 and 1st October 2014 reference of which has been provided by the Objector.
- Full Cost Recovery Tariffs do not mean that the tariffs from subsidising categories be fixed first and then subsidy be juxtaposed thereon. Rather, the tariffs be fixed for all consumer categories at cost of service levels or at $\pm 20\%$ of CoS levels. Thereupon, the subsidised tariffs should be

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

to off-peak periods so as to flatten the load curve and optimise the power purchase cost.

The erstwhile Regulatory Commission had introduced ToD tariff from 1st August, 2010. However, the Hon'ble Commission has only approved an additional surcharge of Rs. 1.00 per unit during the peak hours and has not provided any rebate for consumption of power during off-peak hours. As per section 62(3) of the Electricity Act 2003, the tariff should reflect cost and have to be based on cost causation principles.

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

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

					Rubber	& Coal		
	0600 Hrs - 1700 Hrs (normal)		515 Paise/ KWh	410 Paise/ KWh	565 Paise/K Wh	58 0 Pa ise /K W h		
	1700 Hrs- 2200 Hrs (peak)		740 Paise/ KWh	555 Paise/ KWh	745 Paise/K Wh	75 5 Pa ise /K W h		
	2200 Hrs - 0600 Hrs (night)		450 Paise/ KWh	360 Paise/ KWh	545 Paise/K Wh	56 5 Pa ise /K W h		
3	Bihar	w.e.f. 01.04.2013	All HT Consumers					
	Normal period (0500 Hrs - 1700 Hrs)		Normal rate of energy charges					
	Evening Peak load period (1700 Hrs -2300		120% of normal rate of energy charges					

	Hrs)			
	Off-peak load period (2300 Hrs - 0500 Hrs)		85% of Normal rate of energy charges	
4	Chandigarh	w.e.f. 01.04.2013	HT/EHT Consumers (Optional)	
	Normal period (0600 Hrs - 1800 Hrs)		Normal rate of energy charges	
	Evening Peak load period (1800 Hrs - 2200 Hrs)		120% of normal rate of energy charges	
	Off-peak load period (2200 Hrs - 0600 Hrs)		90% of Normal rate of energy charges	
5	Chhattisgarh	w.e.f. 01.08.2013	For Consumer EHV-2, EHV-3, EHV-4, HV-1, HV-2, HV-3 and HV-10	
	Normal period (0500 Hrs - 1800 Hrs)		Normal rate of energy charges	
	Evening Peak load period (1800 Hrs - 2300 Hrs)		130% of normal rate of energy charges	
	Off-peak load period (2300 Hrs - 0500 Hrs)		85% of Normal rate of energy charges	

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

	Peak load period (1800 Hrs - 2200 Hrs)		charges	
	Off-peak load period (2200 Hrs - 0600 Hrs)		90% of Normal rate of energy charges	
8	Jharkhand	w.e.f. 01.08.2012	All HT Consumers	
	Morning peak hours (0600 Hrs - 1000 Hrs)		120% of normal rate of energy charges	
	Evening peak hours (1800 Hrs - 2200 Hrs)		120% of normal rate of energy charges	
	Off-peak period (2200 Hrs - 0600 Hrs)		85% of normal rate of energy charges	
9	Karnataka	w.e.f. 01.05.2013	LT-5(a) & (b) Industrial heating & motive power (optional) HT-1 and HT-2 (a), (b), (c)	
	2200 Hrs - 0600 Hrs		(-) 125 Paise /KWh	(-) 125 Paise /KWh
	0600 Hrs - 1800 Hrs		NIL	NIL
	1800 Hrs - 2200 Hrs		(+) 100 Paise/KWh	(+) 100 Paise/KWh
10	Kerala	01	EHT, HT and LT	LT-I(.500

			Industrial Consumer (Load above 20 KW)	Units/months)	
	Normal period (0600 Hrs - 1800 Hrs)		100% Ruling rate of energy charges	100% Ruling rate of energy charges	
	Evening peak (1800 Hrs -2200 Hrs)		150% Ruling rate of energy charges	120% Ruling rate of energy charges	
	Off-peak period (2200 Hrs - 0600 Hrs)		75% Ruling rate of energy charges	90% Ruling rate of energy charges	
11	Madhya Pradesh		For Coal Mines, Industrial , Seasonal, Irrigation, PWW consumers		
	Normal period (0600 Hrs - 1800 Hrs)		Normal rate of energy charges		
	Evening Peak load period (1800 Hrs - 2200 Hrs)	w.e.f. 01.04.2013	15% of normal rate of energy charge as surcharge		
	Off-peak load period (2200 Hrs -0600 Hrs)		7.5% of normal rate of energy charge as surcharge		

	12	Maharashtra	w.e.f. 01.08.2012	LT-V(B), LTX(B) & ©, LT-V(A) & LT-x(A) optional, HT-I, HT-II (B), HT IV & HT -IX (above base tariff)	
		0600 Hrs - 0900 Hrs & 1200 Hrs - 1800 Hrs		NIL	
		0900 Hrs - 1200 Hrs		(+) 80 Paise/KWh	
		1800 Hrs - 2200 Hrs		(+) 110 Paise/KWh	
		2200 Hrs - 0600 Hrs		(-) 100 Paise/KWh	
	13	Maharashtra -Mumbai (B.E.S.T, TATA Power Co. & Reliance Energy)	B.E.S.T. & Reliance Energy w.e.f. 01.09.2013 Tata Power Co. w.e.f. 01.07.2013	LT & HT Industrial, Commercial, Public Services (Over & above base tariff)	
		0600 Hrs - 0900 Hrs		NIL	
		0900 Hrs - 1200 Hrs		(+) 50 Paise /KWh	
		1200 Hrs - 1800 Hrs		Nil	
		1800 Hrs - 2200 Hrs		(+) 100 Paise /KWh	
		2200 Hrs - 0600 Hrs		(-) 75 Paise/KWh	

	14	Puducherry	w.e.f. 01.04.2013	HT/EHT Consumers (Optional)	
		Normal period (0600 Hrs - 1800 Hrs)		Normal rate of energy charges	
		Evening peak load period (1800 Hrs - 2200 Hrs)		120% of normal rate of energy charge	
		Off-peak load period (2200 Hrs - 0600 Hrs)		90% of normal rate of energy charge	
	15	Tripura	w.e.f. 01.04.2013	Industrial. Tea/Coffee/Rubber, Bulk supply , Water Works & Irrigation consumers	
		Normal period (0500 Hrs - 1700 Hrs)		Normal rate of energy charges	
		Evening Peak load period (1700 Hrs - 2300 Hrs)		140% of normal rate of energy charge	
	Off-peak load period (2300 Hrs - 0500 Hrs)	60% of normal rate of energy charge			

	16	Uttarakhand	w.e.f. 01.05.2013	LT & HT Industrial		
		Season Time of day		Normal Hrs	Peak Hrs	Off Peak Hrs
		Winters 1st October - 31st March		09:30-17:30 Hrs	06:00-09:30 & 17:30 - 22:00 Hrs	22:00-06:00 Hrs
		Summers 1st April - 30th September		07:00-18:00 Hrs	18:00 - 23:00 Hrs	23:00-07:00 Hrs
		For LT Industry - Energy Charges		340 Paise/kVAh	5100 Paise/kVAh	306 Paise/kVAh
		For HT Industry - Energy Charges				
		Load Factor upto 33%		305 Paise/kVAh	540 Paise/kVAh	275 Paise/kVAh
		Load Factor above 33% and upto 50%		330 Paise/kVAh	540 Paise/kVAh	297 Paise/kVAh
	Load Factor above 50%	360 Paise/kVAh	540 Paise/kVAh	324 Paise/kVAh		

	17	Uttar Pradesh	w.e.f. 10.06.2013	Small & Medium Power and Large & Heavy Power		
		2200 Hrs - 0600 Hrs		92.5% of Normal rate of energy charge		
		0600 Hrs - 1700 Hrs		Normal rate of energy charges		
		1700 Hrs - 2200 Hrs		115% of Normal rate of energy charge		
	18	West Bengal	Applicable Tariff Scheme w.e.f 01.04.2013	Low and medium Voltage Consumers		
		Season Time of day		06:00-17:00 Hrs	17:00 Hrs-23:00 Hrs	23:00 Hrs - 06:00 Hrs
		i) Irrigation pumping for agriculture (Metered)		354 Paise/kWh	729 Paise/kWh	212 Paise/kWh
				High & Extra High Voltage Consumers		
		i) Industries (220 KV)		534 Paise/kWh	747 Paise/kWh	353 Paise/kWh
		ii) Industries (400 KV)		514 Paise/kWh	719 Paise/kWh	340 Paise/kWh
	iii) Community Irrigation	560 Paise/kWh		885 Paise/kWh	279 Paise/kWh	
	iv) Commercial Plantation	605 Paise/kWh		847 Paise/kWh	400 Paise/kWh	

	19	West Bengal - Durgapur Projects Ltd	Applicable Tariff Scheme w.e.f 01.04.2013	Low and medium Voltage Consumers		
		Season Time of day		06:00-17:00 Hrs	17:00 Hrs-23:00 Hrs	23:00 Hrs - 06:00 Hrs
		Irrigation pumping for agriculture (Metered)		303 Paise/k Wh	606 Paise/k Wh	167 Paise/kWh
		i) Industries (33KV)		High & Extra High Voltage Consumers		
		Summer		428 Paise/k Wh	565 Paise/k Wh	321 Paise/kWh
		Monsoon		426 Paise/k Wh	562 Paise/k Wh	320 Paise/kWh
		Winter		424 Paise/k Wh	560 Paise/k Wh	318 Paise/kWh
		ii) Industries (132KV)				
		Summer		417 Paise/k Wh	550 Paise/k Wh	313 Paise/kWh
		Monsoon		415 Paise/k Wh	548 Paise/k Wh	311 Paise/kWh
		Winter		413 Paise/k Wh	545 Paise/k Wh	310 Paise/kWh

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

	ii) Community Irrigation /Irrigation				
	Summer	365 Paise/k Wh	729 Paise/k Wh	219 Paise/kWh	
	Monsoon	361 Paise/k Wh	721 Paise/k Wh	217 Paise/kWh	
	Winter	357 Paise/k Wh	713 Paise/k Wh	215 Paise/kWh	

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

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

11 REBATE FOR TIMELY PAYMENT OF BILLS

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

It is not in the purview of the Licensee

of many States as depicted in the table below:

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

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

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

12 LOAD FACTOR REBATE

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

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

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

HT Load Factor Incentive Scheme

217. At present, the HT-I(A) Industrial Consumers are provided with a load factor incentive scheme in which a concession/rebate on energy charges

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

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

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

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

is given if the load factor is above certain threshold levels. This scheme has been in operation for the past several years with modifications from time to time as approved by the Commission. The scheme was originally intended to encourage and stabilize demand and was intended to ensure fuller utilisation of surplus power generation capacity available at that time.

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

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

Table: Load Factor Rebate Schemes applicable in Other States

S. No.	States	Tariff Order Year	LF Criteria	Rebate																												
1	Maharashtra	2012-13	> 75%	75%-85% - 0.75% on Energy Charges for every 1% increase, >85% - 1.00% on Energy Charges for every 1% increase																												
2	Madhya Pradesh	2014-15	>50%	11 kV - Rs. 0.60 per unit 33 kV - Rs. 1.00 per unit 132 kV - Rs. 0.80 per unit 220 kV and above - Rs. 0.70 per unit																												
3	West Bengal	2013-14	>55%	<table border="1"> <thead> <tr> <th>Load factor</th> <th>Rebate in Paise / kW <33 kV</th> <th>33 kV</th> <th>>33 kV</th> </tr> </thead> <tbody> <tr> <td>60%-65%</td> <td>1</td> <td>2</td> <td>3</td> </tr> <tr> <td>65%-70%</td> <td>7</td> <td>8</td> <td>9</td> </tr> <tr> <td>70%-75%</td> <td>14</td> <td>29</td> <td>39</td> </tr> <tr> <td>75%-80%</td> <td>20</td> <td>35</td> <td>45</td> </tr> <tr> <td>80%-85%</td> <td>25</td> <td>40</td> <td>50</td> </tr> <tr> <td>85%-90%</td> <td>30</td> <td>45</td> <td>55</td> </tr> </tbody> </table>	Load factor	Rebate in Paise / kW <33 kV	33 kV	>33 kV	60%-65%	1	2	3	65%-70%	7	8	9	70%-75%	14	29	39	75%-80%	20	35	45	80%-85%	25	40	50	85%-90%	30	45	55
Load factor	Rebate in Paise / kW <33 kV	33 kV	>33 kV																													
60%-65%	1	2	3																													
65%-70%	7	8	9																													
70%-75%	14	29	39																													
75%-80%	20	35	45																													
80%-85%	25	40	50																													
85%-90%	30	45	55																													

			85%			
			85%-	35	50	60
			90%			
			90%-	40	55	65
			92%			
			92%-	45	60	70
			95%			
			>95%	50	65	75

In view of the above, the Objector prays to the Hon'ble Commission to re-introduce Load Factor Rebate as the presence of such a scheme would incentivise the industry to utilise its machinery in an efficient manner thereby helping the Licensee in flattening the load curve.

13 SEGREGATION OF TECHICAL AND COMMERCIAL LOSSES

In the ARR filed by the Petitioner, there are no separate estimates provided for technical and commercial losses, except description of measures aimed at reduction of the same. It is pertinent to mention that distribution loss is a controllable factor under the MYT framework.

In view of the above, to set the base line of distribution loss estimate, the Hon'ble Commission may either require the Licensee to carry out proper loss estimation studies for assessment of technical and commercial losses under its supervision, or initiate a study itself. The study should segregate voltage-wise distribution losses into technical loss (i.e. Ohmic/Core loss in the lines, substations and equipment) and commercial loss (i.e. unaccounted energy due to metering inaccuracies/inadequacies, pilferage of energy, improper

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

	<p>set for metering. The Objector feels that unless very clear incentives and disincentives are built in the system, the vision of universal metering would remain merely a wishful and glorious intention of the legislature.</p>	
	<p>15 TRUE UP OF TSNPDCL FOR FY 2013-14</p> <p>1) Loss Levels - The TSNPDCL in Form 4A has depicted that the actual distribution losses in FY 2013-14 are 14.89% as against the target of 13.45% approved in the FY 2013-14 Tariff Order. It is pertinent to mention that distribution loss is a controllable factor under the MYT framework. In view of the same, the consumers cannot be burdened with the inefficiency which is attributable to the Licensee.</p>	<p>The Licensee is putting most efforts in reducing losses. Regular network strengthening works for reduction of technical losses with various schemes are being taken up and necessary steps are being taken up for reducing commercial losses by conducting regular DPE inspections. TSNPDCL has under taken various loss reduction measures distribution losses have brought down from 30.52% in 2000-01 to 14.89% in 2013-14.</p>
	<p>2) Non Consideration of Delayed Payment Charges for Truing up: A close scrutiny of the subject Petition and the financial statements of TSNPDCL for FY 2013-14 reveal that Delayed Payment Charges to the tune of Rs. 71.38 crore have not been added to the revenue being trued up. Delayed Payment Charges are in the nature of revenue and is a tariff income. The Objector humbly submits that the Delayed Payment Charges ought to be trued up and deducted from the ARR.</p>	<p>In the filing of ARR for the years, no bad & doubt full dents are claimed by the licensee and the Hon'ble Commssion also not provided for bad & doubt full debts from the revenue from sale of power debtors. In spite of the above, the billing and collection procedure prescribed by the Hon'ble Commission for revenue from sale of power from the consumers is as follows.</p> <ul style="list-style-type: none"> ➤ The energy supplied to consumers is being billed after completion of billing month (monthly/bi-monthly) only. ➤ The due is fixed by giving 15 days from the date of the bill. ➤ The consumer is given another 15 days from the due date of the bill for disconnection of his service.

		<p>From the above, it is observed that the two month revenue from sale of power is held up with consumer. To meet the above, the working capital is required by the licensee. The Hon'ble Commission has allowed 1/12 of the O&M Cost only as working capital requirement of the licensee.</p> <p>The licensee is utilizing the Delayed Payment Charges to meet the bad & doubt full debts and working capital requirement. In view of the Regulatory accounts, the licensee has excluded the DPS from the Non-Tariff income in true up.</p>
	<p>3) The Licensee has stated that <i>“the actual average revenue realisation for the FY 2013-14 is Rs. 2.90 per unit as against the Commission approved average revenue realisation of Rs. 3.06 per unit which is less by Rs. 0.16 per unit resulted in lower revenue”</i>.</p> <p>Further the Licensee has stated:</p> <p><i>“As can be seen from the table above, in 2013-14, the percentage of metered sales on input is lower than the Tariff Order level by 5.33%. The reduction is mainly due to imposing R&C measures on HT consumers and LT industrial consumers in the first four months and load relief on other LT consumers except agriculture consumers. The following reasons led to decrease in metered sales over the Tariff Order.</i></p>	<p>The Discom has claimed true-up for expenses incurred as per audited accounts and as per the APERC regulation 4 of 2005.</p> <p>Since it is the actual cost incurred by the Licensee, Hon'ble commission is requested to allow the same.</p>

	<ul style="list-style-type: none"> ➤ <i>Total load curtailment (due to Load relief and R&C measures) during FY 2013-14.</i> ➤ <i>Increase in agriculture consumption by 406 MU which is 10.26% higher than the Tariff Order approved value”</i> <p>The adverse consumer sales mix has led to under recovery of revenue to the tune of Rs. 161.88 crore $\{(10286.67 \text{ MU} \times \text{Rs. } 3.06 \text{ per unit} / 10) - (\text{Rs. } 2981.05 \text{ crore})\}$. The Objector urges that consumer sales mix is not classified as an ‘uncontrollable factor’ as per the Terms of the Tariff Regulations and hence the Licensee has to absorb the burden of under recovery on account of adverse consumer sales mix without levying any burden on this account on the consumers.</p>	
	<p>4 Supply Margin - The Licensee has claimed Rs. 13.94 crore in FY 2013-14 towards Supply Margin. The Objector submits that there is no provision for allowance of Supply Margin in the Tariff Regulations approved by the Hon’ble Commission. It is urged that the true up should be determined strictly in accordance with the Tariff Regulations and any extraneous claims should be disallowed.</p>	<p>As per the Regulatory practice approved by the Hon’ble Commission, licensee is eligible for 16% return out of which 14% from distribution Business as RoE and remaining 2% as supply merging.</p>
	<p>5) True up of State Government Subsidy based on actual consumption of subsidised categories – As discussed in the foregoing section, titled “State Government Subsidy”, the following category of consumers were subsidised in FY 2013-14 by the State Government:</p>	<p>As per the National Tariff Policy, the tariffs to the consumers are to be fixed at +/- 20% of COS. Hence it is deemed that the consumers whose tariffs are fixed over and above COS will cross subsidise the consumers whose tariffs are below COS to ensure revenue neutrality.</p>

<ul style="list-style-type: none"> • LT-I(A): Consumers with monthly consumption up to 50 units; • LT-I(B): Consumers with monthly consumption more than 50 and upto 100 units; • LT-I(B): Consumers with monthly consumption more than 100 and upto 200 units and • LT-V consumers <p>The actual sales for FY 2013-14 towards subsidised categories filed by the Licensee demonstrate that the actual consumption of the subsidised categories is much higher than the levels approved in the Tariff Order for FY 2013-14 basis which, the subsidy levels had been approved.</p> <p>This requires for re-adjustment of the subsidy level from the State Government, such that the cost of supplying subsidised power to select categories is not imposed on the other consumers in terms of true up of the revenue gap of FY 2013-14.</p> <p>The Hon'ble Commission in the FY 2013-14 Tariff Order had determined the cost of service of LT-1(A), LT-1(B) and LT-5 categories based on the embedded cost of service model.</p> <p>The additional subsidy requirement from State Govt. towards supply to LT-1(A), LT-1(B) and LT-V categories is to the tune of apprx Rs. 335.13 crore for TSNPDCL as depicted in the table below:</p>	<p>Any other revenue deficit after adjusting cross subsidy will be met through Government Subsidy.</p>
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Table: Additional Subsidy Requirement from State Govt. for FY 2013-14

Particulars	(Rs Crore)
Subsidy Requirement of LT-1(A) and LT-1(B)	802.30
Subsidy Requirement of LT-V	2088.11
Total Subsidy Requirement	2890.41
Less: State Govt. Subsidy as per audited accounts	2555.28
Additional Subsidy Requirement from State Govt.	335.13

The Objector has elaborated in the foregoing sections that the Hon'ble Commission should re-adjust the level of subsidy from State Govt. based on actual consumption levels such that the cost of supplying subsidised power to select consumer categories is not borne by the subsidising consumers in terms of the true up of the revenue gap of FY 2013-14. It is urged that the Hon'ble Commission may direct TSNPDCL to collect the additional subsidy amount to the tune of Rs. 335.13 crore from State Govt., being the balance subsidy requirement for FY 2013-14 in view of the actual sales to subsidised categories and necessary adjustment may be made in the true-up / true-down being approved for the relevant year.

	<p>6) Non Tariff Incomes – The Licensee has submitted the details of Non Tariff Incomes in Form 6 and Form 11 of the Tariff Forms published along with the subject petitions. The TSNPDCL has submitted the non tariff incomes to be Rs. 69.00 crore for FY 2013-14. However, there is an imminent deviation in the said figure from the non tariff income stated in the audited accounts. The Hon'ble Commission is requested to conduct a strict prudence check and approve non tariff incomes strictly in line with audited accounts.</p>	<p>Hon'ble Commission has estimated Non-tariff Income based on the annual accounts of the licensee which includes the non-operating incomes. As the incomes such as viz. Delayed Payment Surcharge, Rebate on power purchase, Theft etc are non-operating incomes and some are non-realizable and few are generated by internal efficiencies, these are excluded from the Non-tariff income for the purpose of Regulatory Accounting.</p>
	<p>7) FRP Interest – The Licensee has claimed Rs. 140.88 crore towards interest liability on FRP loan. In this regard, the relevant submissions of the Licensee are reproduced below:</p> <p><i>10. True-ups: A scheme for financial restructuring of State owned licensees was formulated and approved by the Government of India to enable the turnaround of the state owned licensees and ensure their long term viability. The scheme contains measures to be taken by the State Government and State licensees for achieving turnaround by restructuring debt with support through a transitional Finance mechanism.</i></p> <p><i>11. Under FRP scheme, accumulated losses of the Licensee as on 31st March 2013 was considered and was partly taken over by the State Government through issue of bond and the balance needs to be serviced by the Licensee through short-term loan. As on date</i></p>	<p>The accumulated losses as on 31st March 2013 is mainly due to purchase of costly power, unrecovered portion of FSA till FY 2013-14.</p> <p>The entire scheme of FRP was designed for the financial turnaround of the sector with measures to be committed by discoms, state government and GOI.</p> <p>The accumulated losses of the discoms as per audited financial accounts have been considered while devising this scheme and the success of this scheme hinges on the discoms attaining commercial viability through this scheme and implementation of measures as outlined in the scheme.</p> <p>Hence the Discom Prays that the Hon'ble Commission allows the recovery of interest and principal cost as filed by the licensee.</p>

*the Licensee has structured short-term loan of Rs 1225 cr. The principal repayment of this loan is scheduled to start from FY 2017-18 onwards after a three year moratorium. **The Licensee prays that the Honourable Commission permits the recovery of cost of servicing interest and principal through tariffs as and when principal repayment of loan commences. However, the Licensee has to service the interest cost on the ST loan from FY 2013-14.***

12. As the Licensee is not claiming a separate true-up for the years prior to 2013-14 and as the above short term liability is not part of the asset base on which the Licensee earn the return, Licensee need to recover the above interest cost through tariffs. The annual interest cost for the short-term loan is Rs 141 cr. The Licensee prays that the Honourable Commission allows the licensee to recover the above interest cost through tariffs. The Licensee prays that the Honourable Commission allows the Licensee to claim the true-up for distribution business for FY 2013-14 in the next retail supply filing.” (Emphasis supplied)

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

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

			<p>was towards restructuring of past years accumulated losses which were a result of inefficiencies of the Licensee.</p> <p>The Tariff Regulations provide for a normative working capital and interest thereon. Similarly, the power purchase cost is approved in a Tariff Order on a year to year basis based on actuals. The power purchase liability had piled up due to failure of the Licensee to pay up the generators in a timely manner. Similarly, the working capital loans over and above the normative working capital were taken to bridge the cash gap which was due to inefficiency in terms of T&D losses and failure to collect the dues.</p> <p>Thus, there is no occasion for allowance of FRP interest in the</p>	
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			ARR / Tariff as the FRP loans pertain to outstanding working capital loans and outstanding power purchase liabilities.	
	2	<i>The Licensee prays that the Honourable Commission permits the recovery of cost of servicing interest and principal through tariffs as and when principal repayment of loan commences.</i>	<p>The FRP loans pertain to the loans which have been raised to liquidate the outstanding working capital loans and outstanding power purchase liabilities. The power purchase cost has already been allowed in the ARR Orders of past years. Similarly, the Tariff Regulations provide for a normative working capital and interest thereon.</p> <p>Any further claims towards FRP loans are extraneous to the Tariff Regulations.</p> <p>Any claims towards FRP loans would tantamount to double allowance of the same claims; as such amounts have</p>	

			already been allowed in the past in the ARR.	
		3	<p><i>As the Licensee is not claiming a separate true-up for the years prior to 2013-14 and as the above short term liability is not part of the asset base on which the Licensee earn the return, Licensee need to recover the above interest cost through tariffs. The annual interest cost for the short-term loan is Rs 141 cr.</i></p> <p><i>The Licensee prays that the Honourable Commission allows the licensee to recover the above interest cost through tariffs.</i></p>	<p>The Licensee is obligated to file final true up petitions for the second control period i.e., FY 2009-10 to 2013-14. The Licensee cannot be allowed to claim interest on FRP loans in lieu of failure to file the true up petitions for FY 2009-10 to 2012-13.</p> <p>The Hon'ble Commission is urged to direct the Licensee to immediately file the True up Petition for all the years of the second control period i.e., FY 2009-10 to 2013-14.</p> <p>It is well settled in law that any item is eligible to be included in tariff to be charged from the consumers, if the consumers have reaped the benefit out of such expenditure.</p>

	4	<p><i>The Licensee prays that the Honourable Commission allows the Licensee to claim the true-up for distribution business for FY 2013-14 in the next retail supply filing.</i></p>	<p>Tariff Policy states:</p> <p><i>“Once the revenue requirements are established at the beginning of the control period, the Regulatory Commission should focus on regulation of outputs and not the input cost elements. At the end of the control period, a comprehensive review of performance may be undertaken. Uncontrollable costs should be recovered speedily to ensure that future consumers are not burdened with past costs.”</i></p> <p>The Licensee is obligated to immediately file a petition for true up for distribution business for all the years of the second control period i.e., FY 2009-10 to 2013-14 immediately in terms of the Tariff Policy and the Tariff Regulations. It is urged that the Licensee should not be</p>	
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				permitted to delay the filing of the true up petition for distribution business.	
<p>8 Carrying Cost – Regulation 10.5 of the Tariff Regulations provide:</p> <p><i>“Provided that the Commission shall allow the financing cost on account of the time gap between the time when the true-up becomes due and when it is actually allowed and the corrections shall not be normally revisited.”</i></p> <p>The Objector submits that the Licensee should refund to the consumers the excess tariff recovered corresponding to the trued-down revenue gap for FY 2013-14 along with interest at 1.20 times of the Base rate + 350 basis points.</p> <p>In view of the above submissions, the Objector submits that as per its assessment, the consumers are entitled for a refund of Rs. 676.66 crore (plus carrying cost) as against a true-up of Rs. 39.37 crore submitted by the TSNPDCL for FY 2013-14. The Objector’s assessment of the revenue gap for FY 2013-14 based on audited accounts is provided in the table below:</p>				<p>In the current scenario where the licensee is saddled with losses of previous years, the question of licensee gaining on revenue recovered as true-down in 2013-14 doesn’t arise.</p> <p>Further the licensee as filed for the revenue gap in FY 2013-14 for true-up, and the licensee prays that the Hon’ble Commisison accepts the filing of licensee which has loss of revenue due to adverse sales mix.</p>	

Table: Objector's Assessment of the Trued up Revenue Gap for FY 2013-14 for TSNPDCL

ARR Line Item (Rs Crore)	Approved in Tariff Order	Actual as per Audited Accounts	Allowable as per Objector's Assessment
Distribution Cost	890.88	890.88	890.88
Transmission Charges	222.85	227.47	227.47
SLDC Charges	6.58	6.72	6.72
PGCIL & ULDC charges	71.76	95.55	95.55
Network and SLDC Cost	1,192.07	1,220.62	1,220.62
Power purchase	4,604.24	4,378.49	4,378.49
Interest on Consumer Security Deposits	41.48	38.65	38.65
Supply margin in Retail Supply Business	7.23	6.76	6.76
Other Costs if any	0.58	0.18	0.18
Supply Cost	4,653.53	4,424.08	4,424.08
Aggregate Revenue Requirement	5,845.60	5,644.70	5,644.70
Revenue from Tariff	3,240.27	2,981.05	2,981.05
Non-Tariff Income	55.30	69.00	69.00
Tariff Subsidy	2,550.04	2,555.28	2,555.28
Total Revenue	5,845.61	5,605.33	5,605.33

	Total Gap/(Suplus) from Retail Business (A)	-	39.37	39.37	
	Adjustments as per Objector's Assessment: (B)				
	(i) Truing up of income from Delayed Payment Charges			71.38	
	(ii) Disallowance of Supply Margin claimed			6.76	
	(iii) Add-back of Under Recovery on account of adverse consumer sales mix			161.88	
	(iv) Disallowance of FRP Interest			140.88	
	(v) Additional Subsidy Requirement from State Govt.			335.13	
	Re-stated Revenue Gap / (Surplus) from Retail Business in FY 2013-14: (A-B)			-676.66	
	16 TRUE UP OF TSNPDCL FOR FY 2014-15				
	<p>The objections in respect of the true up claims of TSNPDCL for FY 2014-15 are summarised below:</p> <p>1) Order on Generation Tariffs for FY 2014-19 period - Power Purchase Cost constitutes around 80% of the total ARR out of which cost of power from state owned sources constitutes around 45%. The Order on Generation tariffs for FY 2014-15 to 2018-19, based on the Generation Tariff Regulations is yet to be passed by the Hon'ble Commission. The TSGENCO and APGENCO may be directly to file the petition for the next control period in a time bound manner and the same may be finalised by the Hon'ble Commission expeditiously.</p>				This is not under the purview of TSDISCOMS

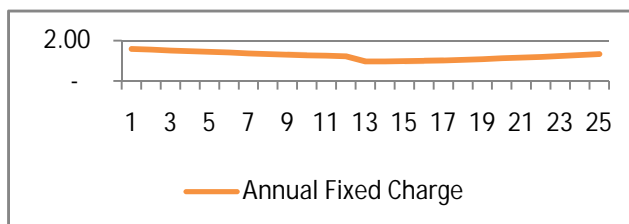
Till the time the generation tariffs are not finalised for TSGENCO and APGENCO stations:

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

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

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

Graph: Typical Annual Fixed Charges in a Cost Plus Model



Typical Model for a 1000 MW project with a capital cost of Rs. 5,000 crores based on CERC Regulations, 2009.

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

2) Power Purchase Cost – The following table depicts that the power purchase cost per unit computed by the Licensee in the current petition has increased by 9.8% in FY 2014-15 and then has tapered by around 3.6% in the ensuing year FY 2015-16.

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

a. Generation Tariff Order for FY 2009-14 period not given effect to – The erstwhile Regulatory Commission had approved the tariff of APGENCO

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

TSDISCOMS have considered Bilateral purchases at average

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

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

stations for the period 01.04.2009 to 31.03.2014 vide its Order dated 31.05.2014. **The tariff approved for the APGENCO stations in the said Order was less than the provisional tariff allowed in the Retail Tariff Orders by Rs. 2,081.81 crore. As the APGENCO had already billed the Discoms based on the provisional tariff approved in the Retail Tariff Orders; the Commission had held that APGENCO should reimburse the Discoms towards the excess recovery to the tune of Rs. 2,081.81 crore. In view of the above, the Commission had directed the APGENCO to adjust the difference between the tariff already collected from the Discoms and the tariff approved in the said Order dated 31.05.2014 within a period of six months i.e., before 31.12.2014. Thus, due adjustment towards the refund was to be made in FY 2014-15.**

The relevant extracts of the said Order is reproduced below:

“The tariff approved now is less than that provisional tariff allowed in the Retail Tariff Orders by Rs.2081.81 Crs. APGENCO has already been billing the DISCOMs based on the provisional tariff approved in the Retail Tariff Orders. APGENCO should reimburse DISCOMs to this extent. The Commission recognizes that the bills already raised by APGENCO on DISCOMs may be less than the tariff provisionally approved in the respective

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

*Retail Tariff Orders due to network factors like delay in Commissioning of the new power plants. **Therefore, the Commission directs APGENCO to adjust the difference between the Tariff already collected from DISCOMs and the Tariff approved now as per clause 8.3 of Regulation 1 of 2008 within a period of six months i.e. before 31.12.2014.***” (Emphasis supplied)

Thus, the consumers are entitled for a refund of Rs. 2,081.81 crore towards the excess power purchase cost claimed by the Discoms over the second control period. The Objectors submits that the Distribution Licensee has not provided for such refund in the true up being claimed in the subject petition for FY 2014-15. It is a gross violation of the directions of the Hon'ble Commission given in the Order dated 31.05.2014. It is urged that the Hon'ble Commission may pass the necessary adjustment along with carrying cost towards the refund entitlement of the consumers as detailed above.

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

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

c. Bilateral and Market Purchases

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

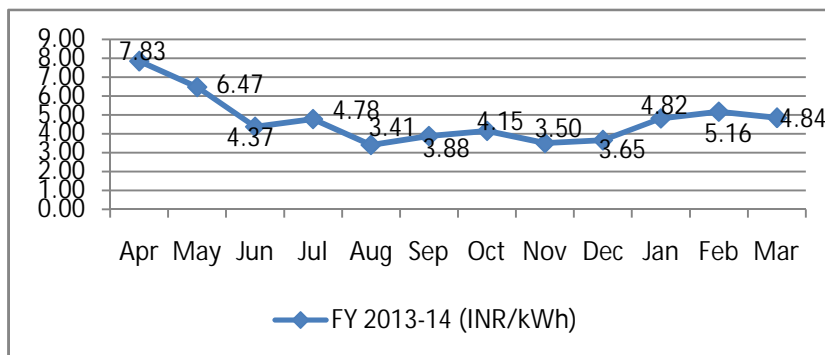
The Objector submits that there seems to be a gap between the availability and requirement because the licensees have projected lower availability from APGENCO and TSGENCO stations and higher sales. In the opinion of the Objector, the Commission would disallow such aberrations and there would either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

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

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

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

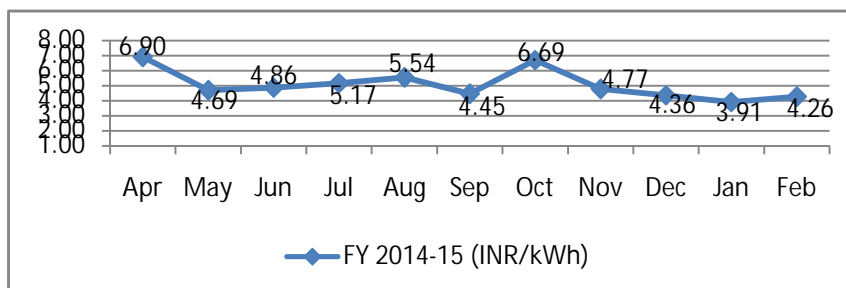
Graph: Average Prices Prevailing on IEX in FY 2013-14 (Apr 2013 - March 2014)



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

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

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



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

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

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

Considering the above, it is humbly prayed that the maximum ceiling may be fixed at or below Rs. 5.06 per unit as against Rs. 6.00 per unit projected by the TSSPDCL. Thus, a disallowance of Rs. 857.56 crore is {9,123 MU x (Rs 6.00 per unit minus Rs. 5.06 per unit)} proposed towards market and bilateral purchases in FY

	<p>2014-15 in respect of TSNPDCL and TSSPDCL. In the absence of the Licensee wise break-up of the bilateral and market purchases in FY 2014-15, the Objector has allocated the proposed disallowance in the proportion of the overall power purchase ratio. Thus, a disallowance of Rs.248.63 crore is attributable to TSNPDCL and Rs. 608.93 crore is attributable to TSSPDCL.</p>	
	<p>3) Supply Margin - The Licensee has claimed Rs. 8.01 crore in FY 2014-15 towards Supply Margin. The Objector states that there is no provision for allowance of Supply Margin in the Tariff Regulations approved by the Hon'ble Commission. It is urged that the ARR and Tariff should be determined strictly in accordance with the Tariff Regulations and any extraneous claims should be disallowed.</p>	<p>As per Wheeling tariff order for the period 2009-2014, Hon'ble Commission had allowed for a Return on Equity of 16%, allowing 14% in Distribution business and 2% in the Retail Supply business. The licensee has followed the same approach in this Retail ARR filings by considering 2% return on Equity as the supply margin</p>
	<p>4) Estimates of Realisation per unit have dropped – The Hon'ble Commission in the Tariff Order for FY 2013-14 had approved an overall realisation rate of around Rs. 3.06 per unit for TSNPDCL. As against this, the actual realisation rate has been stated by TSNPDCL to be Rs. 2.90 per unit in FY 2013-14 and has been projected even lower to be at Rs. 2.80 per unit in FY 2014-15.</p> <p>The commercial and LT industrial consumers are most affected due to change in sales mix. Due to the lower allocation of power, the commercial and LT industrial consumers are not able to meet their power requirement. The Objector requests the Hon'ble Commission to direct</p>	<p>The average realisation is dependent on the sales mix and sales mix changes across years due to the policy environment, other business and socio-economic factors.</p> <p>While projecting sales for FY 2015-16, the discoms have considered the above factors as well as the level of load shedding, in previous year. The discoms pray that the Hon'ble Commission provides a mechanism to address the under-recovery of revenue due to adverse sales mix.</p>

	<p>the Licensee to at least maintain the sales mix approved by the Commission in the Tariff Order for FY 2013-14. The Petitioner wants to highlight the fact that increase in sales to lower tariff consumers while decreasing the sales mix to higher tariff consumers is the main reason for lower revenue realization. Due to the lower revenue realization, the Licensee is seeking the approval of the Hon'ble Commission for truing up of the revenue gap pertaining to shortfall in revenue. It will be the subsidizing consumers such as commercial and LT Industrial consumers that will be most affected in the form of increased tariffs due to truing up of this revenue shortfall.</p> <p>The adverse consumer sales mix has led to under recovery of revenue to the tune of Rs. 284.87 crore $\{(11132.69 \text{ MU} \times \text{Rs. } 3.06 \text{ per unit} / 10) \text{ minus } (3116.55 \text{ crore})\}$. The Objector urges that consumer sales mix is not classified as an 'uncontrollable factor' as per the Terms of the Tariff Regulations and hence the Licensee has to absorb the burden of under recovery on account of adverse consumer sales mix without levying any burden on this account on the consumers.</p>	
	<p>5) Non Tariff Incomes – The Licensee has submitted the details of Non Tariff Incomes in Form 6 and Form 11 of the Tariff Forms published along with the subject petitions. The TSNPDCL has submitted the non tariff incomes to be Rs. 28.12 crore for FY 2014-15. However, the said figure is not comparable with the non tariff incomes earned by the Licensee in past years. The Hon'ble Commission is requested to conduct a strict prudence check and approve</p>	<p>Hon'ble Commission has estimated Non-tariff Income based on the annual accounts of the licensee which includes the non-operating incomes. As the incomes such as viz. Delayed Payment Surcharge, Rebate on power purchase, Theft etc are non-operating incomes and some are non-realizable and few are</p>

	<p>non tariff incomes such that they are relatable to past years. Further, it is stated that the delayed payment charges for the H1 FY 2014-15 ought to be reduced from the revenue gap of FY 2014-15.</p>	<p>generated by internal efficiencies, these are excluded from the Non-tariff income for the purpose of Regulatory Accounting.</p>
	<p>6) True up of State Government Subsidy based on actual consumption of subsidised categories – As discussed in the foregoing section titled “State Govt. Subsidy”, the following category of consumers were subsidised in FY 2014-15 by the State Government:</p> <ul style="list-style-type: none"> • LT-I(A): Consumers with monthly consumption up to 50 units; • LT-I(B): Consumers with monthly consumption more than 50 and upto 100 units; • LT-I(B): Consumers with monthly consumption more than 100 and upto 200 units and • LT-V consumers. <p>The Hon’ble Commission in the FY 2013-14 Tariff Order had determined the cost of service of LT-1(A), LT-1(B) and LT-5 categories based on the embedded cost of service model.</p> <p>As against the subsidy requirement of Rs. 3,122.01 crore, the provision for State Govt. subsidy is to the tune of Rs. 3,140.27 crore in FY 2014-15. Thus, commensurate subsidy is being made available by the State Govt. based on revised estimated sales for FY 2014-15. The Objector welcomes the move of the State Govt in providing adequate and commensurate subsidy towards supply of electricity to subsidised categories.</p>	<p>As per the National Tariff Policy, the tariffs to the consumers are to be fixed at +/- 20% of COS. Hence it is deemed that the consumers whose tariffs are fixed over and above COS will cross subsidise the consumers whose tariffs are below COS to ensure revenue neutrality.</p> <p>Any other revenue deficit after adjusting cross subsidy will be met through Government Subsidy.</p>

<p>7) Carrying Cost – Regulation 10.5 of the Tariff Regulations provide: <i>“Provided that the Commission shall allow the financing cost on account of the time gap between the time when the true-up becomes due and when it is actually allowed and the corrections shall not be normally revisited.”</i></p> <p>The Objector submits that the Licensee should refund to the consumers the excess tariff recovered corresponding to the trued-down revenue gap for FY 2014-15 along with interest at 1.20 times of the Base rate + 350 basis points.</p> <p>In view of the above submissions, the Objector submits that as per its assessment, the consumers are entitled for a refund of Rs. 375.54 crore (plus carrying cost) as against a true-up of Rs. 262.23 crore submitted by the TSNPDCL for FY 2014-15.</p> <p><i>In addition to the above, the consumers are entitled for a refund of Rs. 2,081.81 crore towards the excess power purchase cost claimed by the Discoms over the second control period (FY 2009-14) along with carrying cost.</i></p>	<p>Firstly, approved tariff order cannot be used as a comparison as there is no tariff order for FY 14-15.</p> <p>On the adjustments proposed by the Objector</p> <ol style="list-style-type: none"> i. Purchase of power from Short term has been proposed by TSDISCOMS to ensure quality power on a 24X7 basis is supplied to the consumers in the state. Short term power would be required to the state atleast till all the long term sources start supplying power to the state. Hence, this cost of power purchase cannot be avoided ii. Disallowance of Supply margin: As per Wheeling tariff order for the period 2009-2014, Hon’ble Commission had allowed for a Return on Equity of 16%, allowing 14% in Distribution business and 2% in the Retail Supply business. The licensee has followed the same approach in this Retail ARR filings by considering 2% return on Equity as the supply margin. iii. Under recovery due to change in salex mix: Adhering to the approved sales mix is not under the control of TSDISCOMS. Any true up/true down amount due to change in the sales mix needs to be recognised by the Hon’ble Commission. iv. Additional Subsidy requirement from Govt.: The additional amount of subsidy has to be determined by the Hon’ble Commission and is not under the purview of TSDISCOMS
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		In view of the above, TSDISCOMS request Hon'ble Commission to not consider the adjustments proposed by Objector
	<p>17) ARR FOR TSNPDCL FOR FY 2015-16</p> <p>The TSNPDCL has projected an Annual Revenue Requirement of Rs. 7,598.93 crore for FY 2015-16 including the revenue gap of FY 2013-14 and 2014-15 to the tune of Rs 301.60 crore up.</p>	
	<p>1. Treatment of the Revenue Gap - At the outset, it is stated that the Licensee has not suggested any mechanism to bridge the revenue gap. The subsidy provision from the State Govt has not been indicated. It is humbly stated that the tariffs be fixed for all consumer categories at cost of service levels or at $\pm 20\%$ of CoS levels. Thereupon the subsidised tariffs should be worked upon after considering the available subsidy levels from the State Government.</p>	The revenue gap will be met through Govt subsidy and increase of Tariff
	<p>2. Supply Margin - The Licensee has claimed Rs. 8.61 crore in FY 2015-16 towards Supply Margin. The Objector states that there is no provision for allowance of Supply Margin in the Tariff Regulations approved by the Hon'ble Commission. It is urged that the ARR and Tariff should be determined strictly in accordance with the Tariff Regulations and any extraneous claims should be disallowed.</p>	As per the Regulatory practice approved by the Hon'ble Commission, licensee is eligible for 16% return out of which 14% from distribution Business as RoE and remaining 2% as supply merging.

3. Power Purchase Cost –

a. Share of Energy from RTPP Stage III & Damodaram Sanjeevaiah TPP I and II - The Objectors submits that the allocation of share of energy from RTPP Stage III and Damodaram Sanjeevaiah TPP I and II between Telangana and Andhra Pradesh is not clear as there are conflicting figures stated by the different distribution licensees of the two states.

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

a. TSDISCOMS have projected the energy availability from various energy sources as per the AP Reorganization Act and

G. O Ms No 20 and as per best estimates of parameters like coal availability, maintenance schedules, PLF etc.

TSDISCOMS have projected Fixed cost and variable cost escalation based on information available and also increases in coal cost.

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

b. TSDISCOMS have considered Bilateral purchases at average Rate of Rs 6.00/Unit considering it is expected to get power from generators located within Telangana, within SR and outside SR.

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

d. Keeping in view of the increase in cost of coal, increase in rail freight and diesel charges, TSNPDCL considered a conservative estimate of 2% escalation in the variable cost. TSDISCOMS request the Hon'ble Commission to accept this escalation in variable cost. Any deviations against the approved values would be adjusted in true up activity

Table: Projected PLF of Select APGENCO & TSGENCO Stations

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

It is estimated that if the power purchase from aforementioned stations is projected at the PLF levels achieved in 2014-15, then it would lead to an additional availability of 714 MU from these seven stations alone, to TSSPDCL. This additional availability from APGENCO and TSGENCO stations would replace the costly purchase of power from bilateral purchases and reduce the ARR of the

retail supply business.

c. Bilateral and Market Purchases -

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

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

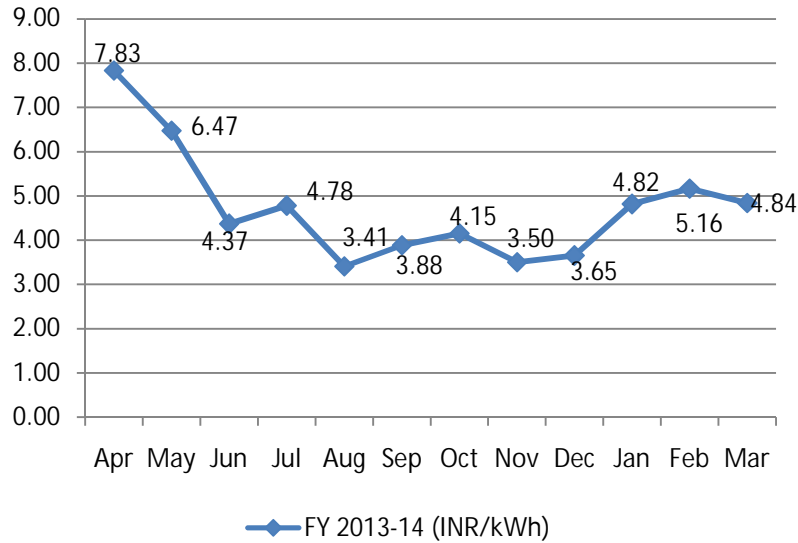
The Hon'ble Commission in the Tariff Order for FY 2013-14 had approved a maximum ceiling purchase price of Rs. 6.11 per unit (as against the Petition of Rs. 5.11 per kWh made by the licensee) through short term sources considering the rates prevalent on the open market and exchanges in FY

2012-13.

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

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

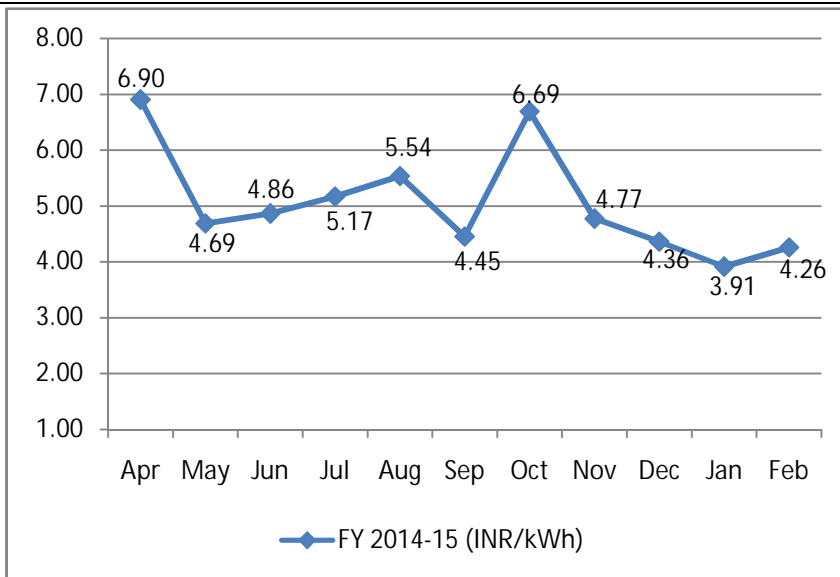
Graph: Average Prices Prevailing on IEX in FY 2013-14 (Apr 2013 - March 2014)



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

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

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



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

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

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

situation.

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

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

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

following:

“The Distribution Licensee shall be entitled to recover or shall refund, as the case may be, the charges on account of Fuel Surcharge Adjustment as approved by the Commission from time to time, suo-motu or based on the filing made by the Distribution Licensee, as the Commission may deem fit.”

Section 45-B, of Regulation No.8, dated 28-08-2000 (abolished w.e.f 1.4.2013) provided for the Fuel Adjustment Formula. Subsequently, the Hon'ble Commission has approved the APERC (Terms and Conditions of Determination of Wheeling and Retail Supply of Electricity) First Amendment Regulations, 2014 with a view to provide the variation in power purchase cost for a tariff year, as an item cost in the succeeding year's ARR relating to Retail Supply Business. Thus, power procurement cost based on escalation in the variable costs over and above the actual variable cost is not in line with the Regulations. Variable costs may not be considered on the presumptive basis of the licensee and may be based on actual. Any variation in fuel price was eligible to be adjusted through FSA mechanism up to 31.3.2013 and subsequently is to be allowed to be adjusted in the succeeding year's ARR after the notification of the First Amendment to the Regulation No. 4 of 2005.

In view of the above, the Objector's assessment of the potential disallowance in the variable charges is

	to the tune of Rs. 138 crore.	
	<p>4. Projected Sales – In the past, the Hon'ble Commission's estimates of metered consumption have regularly fallen short against the actuals. Vice versa, the actual agricultural consumption which is subsidised has been more than the levels approved in the Tariff Orders leading to a potential change on the higher side in subsidy requirement levels. Higher consumption by subsidised LT agricultural category has led to an increase in subsidy requirements and this need to be appropriately addressed by the Hon'ble Commission. In the ensuing year, the Hon'ble Commission is requested to approve the agricultural consumption more optimistically so that the deviation is more tapered.</p> <p>The Objector observes that the Licensee has been very optimistic in projecting the industrial and agricultural consumption growth for FY 2015-16 which has necessitated a demand supply gap and the need for short term costly power. Additionally, the connected load growth does not seem commensurate with the projected increase in electricity sales. A conservative increase in connected load projections directly impacts the demand charges and leads to lower revenue projections.</p> <p>The Hon'ble Commission is duly requested to conduct a strict prudence check and approve energy sales based on realistic numbers and not just rely on the projections of the Licensee.</p>	<p>The sales to industrial category in previous years (FY 15-15 and 13-14) has been constrained due to restriction and control measures. For FY 2015-16 sales has been arrived after adjusting for restriction and control (R & C) measures which were earlier in place.</p> <p>Sales for other categories were done on realistic basis considering historical trend and future plans. The overall sales of TSNPDCL for FY 2015-16 is projected to grow at 10% over the FY 2014-15.</p>

	<p>5. Non Tariff Incomes – The Licensee has submitted the details of Non Tariff Incomes in Form 6 and Form 11 of the Tariff Forms published along with the subject petitions. The TSNPDCL has submitted the non tariff incomes to be Rs. 28.12 crore for FY 2014-15. However, the said figure is not comparable with the non tariff incomes earned by the Licensee in past years. The Hon’ble Commission is requested to conduct a strict prudence check and approve non tariff incomes such that they are relatable to past years. Further, it is stated that the delayed payment charges for the H1 FY 2014-15 ought to be reduced from the revenue gap of FY 2014-15.</p>	<p>The licensee has projected non tariff Income for ensuing year duly considering the actual non tariff income as per regulatory accounts and which were going to recurring income in ensuing year also.</p>
	<p>6. State Government Subsidy Requirement in FY 2015-16 - As discussed in the foregoing section titled “State Govt. Subsidy”, the following category of consumers are subsidised by the State Government:</p> <ul style="list-style-type: none"> • LT-I(A): Consumers with monthly consumption up to 50 units; • LT-I(B): Consumers with monthly consumption more than 50 and upto 100 units; • LT-I(B): Consumers with monthly consumption more than 100 and upto 200 units and • LT-V consumers. <p>Based on the projected sales for FY 2015-16, revenue realisation and cost to serve computed by the Licensee, the subsidy requirement towards supply of subsidised power to select consumer categories is to the tune of Rs.</p>	<p>As per the National Tariff Policy, the tariffs to the consumers are to be fixed at +/- 20% of COS. Hence it is deemed that the consumers whose tariffs are fixed over and above COS will cross subsidise the consumers whose tariffs are below COS to ensure revenue neutrality.</p> <p>Any other revenue deficit after adjusting cross subsidy will be met through Government Subsidy.</p>

4,194.32 crore.

Thus, considering the projected sales for FY 2015-16, there is a subsidy requirement of Rs. 4,194.32 crore from the State Government.

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

In view of the above submissions, the Objector submits that as per its assessment, the consumers are entitled for a refund / tariff reduction of Rs. 1,217.12 crore in FY 2015-16.

In addition to the above, the consumers are entitled for a refund of Rs. 2,081.81 crore towards the excess power purchase cost claimed by the Discoms over the second control period (FY 2009-14) along with carrying cost.

2015-16 సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు ప్రతిపాదిత ఛార్జీల పై నర్సాని భూమి రెడ్డిగారి

అభ్యంతరముల / సూచనలకు సమాధానములు

చిరునామ: (గ్రామము), తాంసీ (మండలం), ఆదిలాబాద్ (జిల్లా) తెలంగాణ రాష్ట్రం

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	మా జిల్లా లో ప్రభుత్వము మాకు రైతులకు కల్పించిన	
1.	ట్రాన్స్ ఫార్మర్ రిపేర్ రవాణా భత్యం రైతులకు అందుబాటులో లేదు అండడం లేదు. ట్రాన్స్ ఫార్మర్ రవాణా ఛార్జీలు రైతులకు అందుబాటులో ఉండాలి రైతులకు అంద చేయాలి. ట్రాన్స్ ఫార్మర్ జిల్లా రైతులు పూర్తిగా రవాణాఛార్జీలు భరించి తెచ్చు కొంటున్నారు, కావున అది నేరుగా రైతులకు అందే విధంగా నిబంధనలు రూపొందించాలి.	కాలిపోయిన DTRలను గ్రామీణ ప్రాంతాలలో 24 గంటలలో మార్చడం జరుగుచున్నది. ప్రతీ సబ్-డివిజన్ పరిధిలో ఒక వాహనాన్ని ఇందు మినితం ఏర్పాటు చేయడమైనది. సేవలలో జాప్యమైనచో ఇంకొక వాహనాన్ని తాత్కాలికంగా ఏర్పాటు చేసి సేవలందించడం జరుగుచున్నది.
2.	అడ్వాన్సు రిపేర్ ట్రాన్స్ ఫార్మర్లు కూడా ఏ పవర్ హౌస్ లో ఉండడం లేదు ఎప్పుడు అడిగినా ట్రాన్స్ ఫార్మర్లు లేవు అని సమాధానం AE ల నుండి వస్తుంది ట్రాన్స్ ఫార్మర్లు అందుబాటులో ఉండాలి.	3629 అడ్వాన్సు ట్రాన్స్ ఫార్మర్లు కాలిపోయిన DTRలను మార్చడం కొరకు అందుబాటులో ఉన్న .

C - గ్రూప్ : అభ్యంతరముల / సూచనలకు సమాధానములు

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
1.	ప్రతిపాదిత డిమాండ్ రూ.350 నుండి రూ.370.17 లకు పెంచుతూ ప్రతిపాదించినారు. ఈ ఫిక్స్ డ్ మరియు డిమాండ్ చార్జీల విధానాన్ని రద్దు చేయాలనీ కోరుతున్నాము.	2013-14 సంవత్సరంలో గౌరవ కమీషన్ వారు ఆమోదించిన ధరల ఉత్తర్వు అనుసరించి యూనిట్ ఒక్కంటికి విద్యుత్ సరఫరా వ్యయం సగటు రూ.5.51గా నిర్ణయించబడింది. 2014-15 సంవత్సరంలో రాష్ట్ర విభజన మూలంగా ప్రస్తుత సంవత్సరానికి ధరల ఉత్తర్వు జారీకాబడలేదు అందువల్ల వాస్తవంగా యూనిట్ ఒక్కంటికి వ్యయం 2013-14 తో పోల్చినప్పుడు పెరిగిననప్పటికీ 2013-14 సంవత్సరం ధరల ఉత్తర్వును అనుసరించి విద్యుత్ చార్జీలు కొనసాగించడం జరుగుతుంది. 2015-16 సంవత్సరానికి ఆదాయ ఆవశ్యకత అనుసరించి సగటు విద్యుత్ సరఫరా వ్యయం రూ.6.22 యూనిట్ ఒక్కంటిగా అంచనా వేయడమైనది. ఇది 2013-14 సంవత్సరంతో పోల్చినప్పుడు 12.89%గా పెరుగుదల అంచనా వేయడమైనది. అయినప్పటికీ గౌరవ కమీషన్ ముందు ప్రతిపాదించిన ధరల ప్రతిపాదనలలో కేవలం 5.75% ధర పెంపునకు ప్రతిపాదించడమైనది.
2.	విద్యుత్ చార్జీలు పెంచకుండా, తగ్గించే విధంగా ఆదేశించాలి. గతంలో 5.73 కు పూర్వం వసూలు చేసిన విధంగానే చార్జీలు ఉండాలి.	గౌరవ కమీషన్ వారి పరిధి లోని అంశము.
3.	120 HP వరకు LT 3-B గానే కొనసాగించాలని కోరుచున్నాము.	పరిశ్రమలకు విద్యుత్ కొరత లేకుండా నాణ్యమైన విద్యుత్ అందించుటకు అవసరమైన అన్ని చర్యలను తీసుకోవడం జరుగుతుంది.
4.	పరిశ్రమలకు విద్యుత్ కొరత లేకుండా నిరంతరాయంగా నాణ్యమైన విద్యుత్ ను అందించాలని విజ్ఞప్తి.	

Venkateswarlu Gadipudi, Dy. GM Legal, AP&T, Vodafone South Limited

Objections/ Suggestions

Reply

Prayer to the Hon'ble Commission

a) To order for the rationalization of tariff for telecom towers in the State.

b) To order that the tariffs for consumers with flat load profile and high power factor like telecom towers/CMTE be considered separately.

c) To declare that the tariff for telecom tower/CMTE consumers be re-determined as per relevant acts.

As per the definition stated in the Tariff Order 2013-14 for LT-Category III "***Industrial purpose shall mean, supply for purpose of manufacturing, processing and/or preserving goods for sale, but shall not include shops, business houses, offices, public buildings, hospitals, hotels, hostels, choultries, restaurants, clubs, theaters, cinemas, bus stations, railway stations and other similar premises, notwithstanding any manufacturing, processing or preserving goods for sale.***"

As there is no manufacturing, processing and preserving goods activity, Telecom towers are being categorised under LT-II-Non-Domestic/Commercial category.

Further to the above it is to inform that LT-II Non Domestic/Commercial category is applicable for

a) Consumers who **undertake Non Domestic activity.**

b) Consumers who undertake Commercial activity.

c) **Consumers who do not fall in any other LT category i.e., LT – I, LT – III to LT –VIII categories.**

d) Consumers who avail supply of energy for lighting, fans, heating, air conditioning and power appliances in Commercial or Non-Domestic premises such as shops, business houses, offices, public buildings, hospitals, hostels, hotels, choultries, restaurants, clubs, theatres, cinema halls, bus stations, railway stations, timber depots, photo studios, printing presses etc.

It means LT-Cat II is not only applicable for commercial activity but also for the activities not related to the other LT categories. As Cell towers business does not fall under any of LT – I,III,IV,V,VI,VII categories, it comes under LT-II category.

Replies to the Objections / Suggestions raised on ARR & FPT for FY 2015-16 of Sri M. Venugopala Rao, Sr. Journalist & Convener of Centre for Power Studies, # 7-1-408 to 413, Flat No.203, Sri Sai Darsan Residency, Balkampet Road, Ameerpet, Hyderabad – 500 016

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

2.	<p>3. FINANCIAL RESTRUCTURE PLAN: The Discoms have shown accumulated losses as on 31st March, 2013 of Rs.6455.68 crore for TSSPDCL and Rs.3512 crore for TSNPDCL. Under the financial restructure plan formulated and approved by Gol for the Discoms, the State Government has issued bonds to the extent of Rs.4060.73 crore (around 40% of total losses) - Rs.2316.69 crore for TSSPDCL and Rs.1744.04 crore for TSNPDCL. The Discoms have claimed a balance loss of Rs.4138.99 crore for TSSPDCL and Rs.1767.96 crore for TSNPDCL. They have further explained that the key components of these losses are “unapproved portion of Fuel Surcharge Adjustment (FSA) for the year(s) 2009-10 to 2011-12, (as) the FSA cases are in Courts and Govt. receivable over and above Rs.4553.85 Crs which is agreed by Govt as final settlement.” Against these losses, TSSPDCL and TSNPDCL structured short-term loans to the extent of Rs.1225 crore each. The Discoms have also explained that “as per the terms of the loan, there is a moratorium on principal re-payment for a period of 3 years from 1st April 2014.” They have claimed that the annual interest on these loans for both the Discoms is Rs.282 crore (Rs.141 crore each). The Discoms have maintained that they need to recover the interest cost through tariffs and requested the Commission to allow them to recover the same. The Discoms have also requested the Commission to permit them to recover the cost of servicing interest and principal of these short-term loans as and when principal repayment of loan commences, i.e., from 2017-18. Since the FRP is claimed to be intended to enable the turnaround of the Discoms and ensure their long-term viability, what is the financial support rendered by the Government of India under the programme to the Discoms? The Discoms have stated that the scheme contains measures to be taken by the State Government and State Licensees (Discoms). What are those measures and under what terms and conditions the FRP is approved by the Gol? The details of the scheme as signed by the Gol and the State Government have not been made public. I request the Hon’ble Commission to direct the Discoms to provide me a copy of the FRP.</p>	<p>The Central Government would provide support to FRP through a Transitional Finance Mechanism (TFM) subject to the fulfilment of measures outline in the programme. The TFM has the following features</p> <ol style="list-style-type: none"> 1 Providing liquidity support by way of a grant equal to the value of the additional energy saved by way of accelerated AT & C loss reduction beyond the loss trajectory specified under RAPDRP. 2. Incentive by way of capital reimbursement support of 25% of the principal repayment by the state government on the liability taken over by the state government. <p>The measures outlined as part of FRP schemes are in the areas of</p> <ol style="list-style-type: none"> 1. Tariff setting and revenue realization 2. Release of subsidy 3. Metering measures 4. Audit of accounts 5. Financial performance improvement
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<p>3.</p>	<p>The claims of the Discoms for recovery of the principal and interest thereon of these short-term loans during 2015-16 and/or thereafter from consumers through true-up or tariff as also FSA amounts from 2009-10 to 2011-12 are not permissible for the following reasons, among others:</p> <p>a) At the behest of the State Government of the undivided Andhra Pradesh, the four Discoms had purchased additional power by obtaining loans from Banks and financial institutions under the condition that the Government would redeem both the principal of the loans and interest thereon from 2008-09 onwards. No approval of APERC was sought or obtained for the quantum, period and ceiling price for purchasing that short-term power by the Discoms. As such, the Discoms are entitled to recover that amount from the State Government after deducting the revenue obtained by them on sale of that additional power to non-agricultural consumers and fully to the extent they supplied power under free supply to agriculture. If such expenditure was permissible under FSA, the Discoms should have or would have claimed the same accordingly. That the Discoms did not do so confirms that they are not entitled to recover that amount and interest thereon from consumers.</p> <p>b) To serve political expediency of the then ruling party, at the behest of the Government, especially during pre-election periods, with a view to hoodwinking the consumers that there were no tariff hikes or additional burdens, the Discoms delayed filing of their FSA claims for almost three years without any valid reason and justification. Some of the consumers, especially industrial consumers, challenged the much-delayed claims of the Discoms for FSA and orders given thereon by APERC and obtained stay orders. The recovery or otherwise of those FSA claims would depend on the kind of final orders that would be given by the Supreme Court. Claiming and permitting recovery of such FSA amounts from consumers, when stay orders are in force, would tantamount to contempt of court.</p>	<p>a) The commitments of GoAP towards its dues is finally settled at Rs 8600 crs up to FY 2012-13 the cutoff date for the implementation FRP scheme. GoAP had made a final settlement of its commitments to DISCOMS and agreed to take over the liabilities to the extent of Rs 8600 Crs and share of TS DISCOMs is Rs 4553.85 Crs.</p> <p>Once again it is reiterated that, the commitment of Govt is taken care by agreeing to take over bonds. The DISCOMs are only pleading before the Hon'ble Commission to cover the interest portion on the restructured loans which are due to unable to collect FSA.</p> <p>Further had DISCOMs were in position to collect FSA, it has repaid to the STL and there would not have been any commitment to consumers. In view of the forging facts DISCOMs can only have option to cover the interest under the ARR.</p> <p>It is presumed that, the Tariff Order of FY 13-14 is also applicable to FY 2014-15. The Hon'ble ERC approved market purchases to the extent of 10094 MU at ceiling price of Rs 6 per Kwh .The Discom can procure power from the market or inter change the procurement in case of shortages. The Hon'ble</p>
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	<p>c) Though the then APERC directed the Discoms to resubmit their ARR and tariff proposals in view of bifurcation of the State with updated details, the Discoms did not do so. As such, for their failure of omission, the Discoms should not be permitted to recover carrying cost of Rs.132 crore for the year 2014-15 from the consumers.</p> <p>d) Additional power purchases on short-term basis, without obtaining consent of the Hon'ble Commission on the quantum, period and ceiling price of power, would tantamount to bypassing the regulatory process of the Commission. Without such regulatory process and reasonable limits on quantum and maximum price of additional power to be purchased, short-term purchases of power at higher costs, though apparently for serving consumer needs, actually would lead to imposition of unjustifiable and avoidable burdens on consumers. As such, I request the Hon'ble Commission to examine whether costs of additional power purchases made by the Discoms during 2014-15 are permissible to be recovered from consumers fully or partly or not.</p> <p>e) For the failures of commission and omission on the part of the State Government and/or the Discoms, the consumers of power should not be penalized. Therefore, I request the Hon'ble Commission not to permit claims of the Discoms for true up of the above-explained short-term loans and interest thereon, carrying cost for 2014-15 and the FSA amounts.</p>	<p>ERC also allowed dispatches by use of RLNG to the extent of 2431 mu at Rs 8.97 per unit. The Hon'ble ERC has fixed the ceiling price in case of shortage of supply as per section 62 1(a) of Electricity Ac 2003, the DISCOMs can procure power for period not exceeding one year to ensure reasonable prices of Electricity .</p> <p>Considering the cash flow of DISCOMs it is inevitable for the DISCOMs to recover the debt servicing cost from ARR in view of unable to collect the FSA. Had there been no case pending in courts to collect FSA DISCOMs would have collected and repaid STL. The learned Objector is well aware of the fact that the revenues of DISCOMs are limited and all the expenses are to be matched with suitable revenues in ARR.</p> <p>The debt servicing cost if not covered ARR then the DISCOMs has to defer the generator liability to serve the debt cost. The rebate benefit of 2% to 2.5% on each bills have to be forgone. Further loans have to be drawn to meet the debt servicing cost</p>
4.	<p>4. CONFLICTING CLAIMS OF TS DISCOMS AND AP DISCOMS ON THEIR RESPECTIVE SHARES IN POWER PROJECTS : Projections on availability of power and their shares therein as incorporated in their ARR submissions to TSERC by TS Discoms and to APERC by AP Discoms for the year 2015-16 contain mutually conflicting claims.</p> <p>In the A.P. Reorganisation Act, 2014, it is incorporated : "1.Units of APGENCO shall be divided based on geographical location of power plants.</p>	<ul style="list-style-type: none"> • In accordance with the Clause C(2) of schedule XII of the AP Reorganization Act and as per G.O.Ms.No.20, dt:08.05.2014, the allocation of power generated from the existing and the ongoing power plants located in both the states should be in the ratio of 53.89% & 46.11% respectively for Telangana and Andhra Pradesh.

"2. Existing Power Purchase Agreements (PPAs) with respective DISCOMS shall continue for both on-going projects and projects under construction.

"6. The power of the Central Generating Stations will be allotted in such ratio to the State of Telangana and the State of Andhra Pradesh based on the actual energy consumption of the last 6 years of the relevant DISCOMS in the respective successor State.

"7. For a period of ten years, the successor State that has a deficit of electricity shall have the first right of refusal for the purchase of surplus power from the other successor State.

"8. The districts of Anantapur and Kurnool which fall within the jurisdiction of the AP Central Power Distribution Company Ltd will now be reassigned to the AP South Power Distribution Company Ltd."

Telangana State Discoms TSSPDCL and TSNPDCL have projected their share in NCE units as per geographical location and as per the PPAs entered with erstwhile APCPDCL. In the ARR for 2015-16 submitted to TSERC, they have considered a share of 52.12% in CGS as per recommendations of a committee headed by the chairperson of the CEA appointed by the Govt. Telangana Discoms have claimed a share of 41.68% as per population ratio in Tungabhadra/Machkund Hydel Stations as per A.P. Reorganisation Act. In all other sources, including thermal and Hydel stations of AP Genco and TS Genco and Hinduja, TS Discoms have claimed a share of 53.89% for themselves.

AP Discoms have considered energy availability for upcoming APGENCO and TSGENCO thermal stations - KTHPP Stage II, DSTPP stage I & II - and hydel stations as per their geographical location. They have allocated NCE units to Discoms on geographical consideration. Allocation percentage for all other existing APGENCO thermal stations, CGS stations and gas-based IPPs is considered as 46.11% for AP Discoms out of the share of undivided AP (based on the last five years' average consumption of Anantapur and Kurnool districts which were transferred from the

- Government of Telangana on behalf of TSDISCOMs have already submitted its views on the sharing of the power from both the Central Generating Stations, inter state hydel generating stations, IPPs, NCEs and as well as the State owned Power Generating stations located in AP & Telangana states, before the Committee constituted by MoP, Govt of India, under the chairmanship of Chairperson/CEA, to resolve the issues cropped up post state bifurcation between the TSDISCOMs and APDISCOMs. Decision of the Committee is awaited.

	<p>erstwhile CPDCL (now TSSPDCL) to APSPDCL as part and parcel of the process of bifurcation of the erstwhile Andhra Pradesh). AP Discoms have claimed the entire installed capacity of HNPCL for themselves.</p> <p>While AP Discoms have considered PLF of 75% for thermal stations of AP Genco, TS Genco and CGS, TS Discoms have considered average PLF of 80% for thermal stations of TS Genco and AP Genco. Similarly, while AP Discoms have considered availability of natural gas for four old IPPs at 41% PLF, TS Discoms have considered it as 30% PLF.</p>	
	<p>These conflicting claims on allocation of respective shares in power by AP Discoms and TS Discoms would lead to litigations, with variations in their respective projections on availability of energy. These conflicts are arising mainly as a result of divergent interpretations being given to some of the provisions in the A.P. Reorganisation Act by the Governments of Telangana and Andhra Pradesh. Obviously, the legality or otherwise of these conflicting claims and interpretations cannot be settled by TSERC and/or APERC. Both the Commissions can at best take on record and consider availability of energy as projected by the respective Discoms, but actually cannot ensure such availability. Both the States are making conflicting claims on the legality or otherwise of PPAs pertaining to some of the projects in the erstwhile A.P. As these claims pertain to by now inter-State projects, they fall within the jurisdiction of CERC. If Discoms of both the States resort to legal litigations, they have to approach CERC, thereafter Appellate Tribunal for Electricity and finally the Supreme Court. Such litigations would take their own course.</p> <p>There is scope for resolving these disputes harmoniously and equitably to the advantage of both the States. There are several incongruities in the A.P. Reorganisation Act. Nobody could provide any justification to allocation of 53.89% to Telangana, which has 10 districts and a population and geographical area of about 42%, and 44.11% to Andhra Pradesh, which has 13 districts and a population and geographical area of about 58%, in the installed capacities of power projects available to the undivided Andhra Pradesh. While</p>	<ul style="list-style-type: none"> • In accordance with the Clause C(2) of schedule XII of the AP Reorganization Act and as per G.O.Ms.No.20, dt:08.05.2014, the allocation of power generated from the existing and the ongoing power plants located in both the states should be in the ratio of 53.89% & 46.11% respectively for Telangana and Andhra Pradesh. • Government of Telangana on behalf of TSDISCOMs have already submitted its views on the sharing of the power from both the Central Generating Stations, interstate hydel generating stations, IPPs, NCEs and as well as the State owned Power Generating stations located in AP & Telangana states, before the Committee constituted by MoP, Govt of India, under the chairmanship of Chairperson/CEA, to resolve the issues cropped up post state bifurcation between the TSDISCOMs and APDISCOMs. Decision of the Committee is awaited.

AP Discoms projected a requirement of 58,191 MU for 2015-16, Telangana Discoms have projected a requirement of 52,100 MU. Even after considering the element of inflated demand, there is no basis to justify the above ratio of 44.11:53.89 between the two States. Average consumption of power in respective areas also does not provide any rational basis for distribution of power between the two States. It is an established fact that in the undivided Andhra Pradesh undue importance was given to Hyderabad and Ranga Reddy districts with no or short-duration power cuts and other areas have been discriminated against with long-duration power cuts. As such, taking consumption as basis for distribution of power between both the States would give a distorted and inequitable pattern. Allocation of power to both the States on the basis of population, as is done in the case of allocation of assets in other areas, would affect interests of Telangana. Actually, we have been requesting the erstwhile APERC over the years to direct the four Discoms in the undivided A.P. to ensure supply and power cuts proportionate to demand of respective areas/districts to be fair and equitable. Similarly, allocation of power from existing and on-going projects which were supplying or intended to be supplying power to the four Discoms in the undivided A.P. between Andhra Pradesh and Telangana States on the basis of average demand of respective areas for a period of five or six years before bifurcation of the erstwhile A.P. would ensure equitable distribution between them. Secondly, projects of erstwhile AP Genco can be allocated to Gencos of both the States on geographical basis. Based on the respective ratios of both the States based on the equitable principle of demand-based distribution, whatever deficit Telangana State faces can be made good by required additional allocation from the Central Generating Stations by the GoI or from the share of undivided A.P. in the CGS. Apart from ensuring equity, such an allocation has added advantages to both the States. They can avoid payment of wheeling charges to PGCIL and charges to SRLDC for mutual transmission of power after accounting adjustment which they have to otherwise pay in the event of both the States continuing to have shares in the power projects of both the Gencos. Each State can decide annual overhauling of their respective

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

	<p>a) The Discoms have maintained that “the estimated purchases from such external sources (short-term purchases) are estimated to be 9123 MU for FY 14-15 and 2249 MU for FY 15-16.” They have further maintained that “based on the information available with the licensees on “the possible market prices for such purchases” - Rs.6 per unit for bilateral purchases and Rs.5.50 per unit for power from NTPC’s Jhajjar for 2015-16. (para 4.4.8) At another place in ARR (para 4.3.8), the Discoms have explained that bilateral/short-term purchases of 800 MU per month for April and May, 2015 (900 MU at para 4.2.9) and 525 MU per month from June 2015 and March 2016 have been considered. There does not seem to be any prudent propriety or legal tenability and respect for applicable regulatory process of the Commission on the part of the GoTS in making the Discoms enter into contracts for purchases of short-term power, even without seeking consent of the APERC that has been in existence with due authority in the undivided Andhra Pradesh and after bifurcation of the State till the present TSERC is formed for the quantum, period and ceiling price per unit for purchasing short-term power. What kind of bidding process the Discoms have adopted for short-term purchases? What are the terms and conditions under which TS Discoms have entered into or going to enter into contracts for short-term power purchases? The Discoms have maintained that “whenever the said power is not supplied as per the agreement, the power trader is liable to payment compensation.” Is there any condition incorporated in the contract to the effect that the sellers or Discoms have to pay 20% of cost per unit in the event of failure to supply or failure to purchase power, as the case may be? If so, what do the Discoms propose to do with purchase or non-purchase of projected surplus power, if it cannot be used or re-sold?</p>	
	<p>b) Under long-term power purchase agreement (PPA) signed with Thermal Power Tech Corporation India Limited (TPCIL) by the Discoms of Andhra Pradesh and Telangana for supply of 500 MW for a period of 25 years, TS Discoms have been allocated a share of 53.89%, i.e., 269.54MW, under G.O.Ms.No.20. As per terms of PPA, TPCIL has to commence supply of power from the 1st April, 2017 to the Discoms. However, the Company has requested the Discoms to prepone commencement of supply of power to them to</p>	<p>Variable cost per unit and fixed cost have been considered for FY 2015-16 based on the tariff quoted by the bidder while participating in Case-I Long Term tender</p>

	<p>1st April, 2015 in view of early commissioning of the units of their project. TS Discoms have considered availability of 2011.82 MU from this plant during 2015-16 with an estimated variable cost of Rs.1.82 per Kwh and fixed cost of Rs.352 crore. (However, AP Discoms have considered variable cost of Rs.1.76 per unit and fixed cost of Rs.313.29 crores is for 2015-16.) Why have the TS Discoms considered higher costs? What is the total cost per unit? I request the Hon'ble Commission to examine whether agreeing to preponement of commencement of supply of power to 1st April, 2015 by this project is desirable and beneficial, especially in view of binding contractual obligations on the Discoms to purchase surplus short-term power or pay penalty, if any, for non-purchase.</p> <p>c) Purchases of power and surplus (reserve margin) should be restricted to prudent level by the Commission.</p>	
6.	<p>6. SCOPE FOR AVAILABILITY OF ADDITIONAL POWER NOT CONSIDERED : Against allocation of 53.89% share (538 MW out of 999 MW) to TS Discoms from the four gas-based private power projects of GVK, Spectrum, Lanco Kondapalli and Reliance BSES, only 1482 MU is considered for 2015-16 with an average PLF of 30% only (AP Discoms have considered average PLF of 41%) due to shortage in supply of allocated natural gas. Energy availability is not considered from GVK Extension, Vemagiri, Gautami and Konaseema (total 1499 MW with a share of 53.89% for TS Discoms), as there has been no supply of natural gas from Reliance Industries Limited from KG D6 fields to these projects from 1.3.2013 onwards. The Discoms have not considered scope for availability of additional power from the existing power projects. Nor does the efforts, if any, made by the GoTS seem to be yielding desired results to ensure optimum generation and supply of power exceeding the projected quantum from the existing and upcoming projects for 2015-16. I request the Hon'ble Commission to consider the following points :</p> <p>a) The Government of India has reportedly agreed to divert 2.4 MMBTU of natural gas from the supplies being made to fertilizer plants to enable generation of additional 450 MW from the gas-based projects in A.P. which supply</p>	<p>(a)</p> <ul style="list-style-type: none"> • The natural gas supplies from RIL KG D6 fields to the New IPPs viz., 220 MW GVK Extn, 370 MW GMR Vemagiri, 464 MW GVK Gautami and 444.08 MW Konaseema became zero from 01.03.2013 onwards. Hence there is no generation. • To tackle the prevailing shortage of Natural gas for the aforesaid new IPPs, TSPCC is making arrangements towards additional generation with RLNG by the way of swapping with KG D6 Gas. • TSPCC appraised to the Government of India about the power deficit that is being faced by Telangana State and requested for allotment of 5 MMSCMD RLNG(under swapping arrangement with KG D-6 Gas) for additional Generation of 1000 MW. The Government of India & Ministry of Fertilizers accepted to swap 2.4 MMSCMD of gas with RLNG, which

power under PPAs to the Discoms of Telangana and A.P.. From this, TS Discoms can get their share of 242 MW.

b) If the GoTS insists on the Government of India to ensure supply of natural gas and indigenous coal at least as per allocations made to power projects, which supply power to Telangana and A.P., and succeeds in that direction, substantial additional power will be available from the existing and upcoming power plants. In such an eventuality, TS Discoms can get an additional power of not less than 50 MU per day by making use of idle capacity of existing and upcoming projects.

c) The Discoms have informed that GVK phase I PPA is expiring in June 2015 and Lanco Kondapalli stage I PPA is expiring in December 2015 (A.P. Discoms informed the expiry of the PPA of the latter project is 17.10.2015.) Going by the projections of availability of power from GVK and Lanco plants for 2015-16 of 126.86 MU and 536.17 MU respectively, it is obvious that the TS Discoms have considered availability of power from these two plants only up to the respective dates of expiry of their PPAs and availability of natural gas for 2015-16. Responding to one of my queries pertaining to ARR and tariff proposals for the year 2014-15, the Discoms had replied in January 2014: "Regarding the buy-out (or) otherwise of Projects of GVK (stage I) & SPGL Power Plants, APDISCOMS have initiated steps in accordance with the procedure stipulated in the respective PPAs and would evaluate the benefits of the Options (examining the R&M proposals of IPPs and PPA Renewal (or) Buy-out of the Project) provided in the aforesaid agreements and submit the same to this Hon'ble Commission, for its Scrutiny and directions. This process would take time." Have the TS Discoms evaluated the benefits of these three options and submitted the same to the Hon'ble Commission, indicating their preference for any option and seeking the Commission's consent? I request the Hon'ble

will generate 450 MW approximately out of which TSDISCOMs share will be around 240 MW. Swapping arrangement is yet to be commenced.

c) Regarding the expiry of PPA's of IPPs i.e. M/s. GVK-I, M/s. SPGL & M/s. LANCO, TSDISCOMs examined the merits and demerits of PPA renewal or Buy-out of the Projects and as per the provisions of the PPA, TSPCC took a decision to go for Buy-out duly appointing IFCI (a Govt. of India enterprise) as an Appraiser for determination of Buy-out price of the Power plants. The above process is under progress. After the evaluation i.e. determination of Buy-out price the same will be put before Honble Commission for its approval.

	<p>Commission to hold public hearing on these options, if proposals on the same are already submitted to it by the Discoms. Having paid unreasonably higher fixed costs and other charges to the gas-based IPPs during the period of their PPAs in view of highly questionable and manipulative terms and conditions therein and the failures of the Discoms to get them amended rationally, the consumers of power are entitled to get the benefit of frontloading the tariff by continuing to get power from these projects in the most beneficial manner by the Discoms opting for the option to which ensures maximum benefit to the consumers after expiry of the term of PPAs. I request the Hon'ble Commission to issue necessary directive to the Discoms in this regard and take necessary action in time to protect larger consumer interest.</p>	
7.	<p>7. SCOPE FOR REDUCING INFLATED POWER PURCHASE COST, ARR AND REVENUE GAP & AVOIDABLE LEGAL LITIGATIONS: There is scope for reducing power purchase cost projected by the Discoms. I request the Hon'ble Commission to consider the following points, among others:</p> <p>a) 2% ESCALATION OF VARIABLE COSTS FOR THERMAL PROJECTS SHOULD NOT BE PERMITTED : The Discoms have factored 2% escalation in variable costs of thermal stations of TSGENCO and AP Genco and Central Generating Stations for the year 2015-16 over the variable costs for the first six months of 2014-15. It is generally known that cost of imported coal is coming down, and more usage of imported coal is likely in upcoming years, besides decreasing prices of crude oil and diesel, which may decrease the secondary oil cost and keep transportation cost on low side. Therefore, this 2% escalation is hypothetical and should not be permitted by the Commission. In any case, options are always open to the Discoms to seek true-up of difference in power purchase cost for 2015-16 in the ARR to be proposed for 2016-17. How much would be the proposed 2% escalation in variable costs?</p>	<p>It is to be noted all thermal stations run predominantly on thermal coal supplied from domestic sources like MCL, SCCL etc. while imported coal is been used only in case of domestic coal shortfall.</p> <p>With increase in rail freight rates for coal by 6.3% and increase in green cess to Rs. 200 per metric tonne, the cost of coal is expected to increase significantly which would increase the variable cost of production</p> <p>Still, TSDISCOMS have taken a conservative estimate and projected the increase in variable cost only by 2%</p>

b) ENSURE INTERNATIONAL COMPETITIVE BIDDING FOR PURCHASING IMPORTED COAL : I would like to bring to the notice of the Hon'ble Commission what I had submitted on the ARR proposals of the Discoms for 2014-15 regarding contrived bidding and higher costs for imported coal with a request to consider the same: "As a result of the failure of Gol in ensuring timely supply of at least allocated domestic coal, Thermal projects of AP Genco and Central generating stations have already been forced to buy costly imported coal. There are serious allegations that manipulations and corruption are taking place in purchasing imported coal by confining competitive bidding to a few marketing companies of the Central government. Instead of re-examining the issue and ensuring international competitive bidding to enable foreign producers of coal to participate in the process to ensure real competitive bidding and economic price for imported coal, the Discoms proposed to add 10% escalation over actual variable costs of first half year of 2013-14 of AP Genco and Central generating stations for the next financial year. However, the Commission did not allow the escalation, as suggested by some of us. We request the Commission to take the same stand for the year 2014-15 also, besides disallowing the claim of the Discoms for true up of variable costs of thermal projects of AP Genco and NTPC exceeding the ones permitted by the Commission for the year 2013-14 in view of their failure to ensure that coal is imported by adopting international competitive bidding to enable actual producers to participate in the bidding. Otherwise, the decision of the Commission to disallow 10 per cent escalation in the variable cost of coal-based thermal projects will have no value. Responding to our submissions during the earlier public hearings on FSA claims on the need for providing relevant information pertaining to the procedure adopted for importing coal through competitive bidding and examining the same, the Commission had simply stated that "the role of Commission is limited to verifying whether the coal imported by APGENCO is procured through competitive bidding or not as the cost of it is levied on the

b) Procuring coal through competitive bidding is not under the purview of TSDISCOMS

c) TSDISCOMS have a MoU with Hinduja power. PPA is expected to be signed soon. Based on this consideration, TSDISCOMS have considered energy availability from HNPCL

MoA was entered on 17-05-2013 by the erstwhile APDISCOMs with M/s HNPCL for entering amendments to the existing PPA in line with the Regulations and EA2003. As per the MoA , the Draft amendments are prepared by the both parties and discussed during the meetings with M/s HNPCL. The proposed amendments are sent to M/s HNPCL for their comments. After finalization of the draft amendments, same will be submitted to the Hon ERC for approval.

consumers” (para 36 and page 42 of FSA order of the Commission for the 2nd quarter of 2011-12). The Commission has failed to see that the relevant information pertaining to the procedure adopted by AP Genco for importing coal through competitive bidding is provided to us. Nor did it respond positively to our request to arrange to permit interested objectors to peruse the relevant files in its office in the presence of the officers concerned. The above response of the Commission simply says what its role is but has not made it clear whether it has played its role in its true spirit and examined what kind of competitive bidding is followed for importing coal and whether it is satisfied that that is the only procedure that can be adopted and that no other better procedure can be adopted, based on the actual market conditions prevailing, to explore the possibility for importing coal at prices cheaper than what AP Genco and NTPC are paying, especially in view of the fact that “the cost of it is levied on the consumers”. Did the Commission examine whether AP Genco and NTPC followed international competitive bidding to ensure participation of producers of coal, since coal is being imported from other countries, or simply confined the bidding to a few selective companies or traders who are not producers of coal but middlemen trading in coal? Despite brining the fact that coal is being imported at avoidable higher cost through contrived bidding process and that NTPC is paying much higher cost than the price being paid by AP Genco for importing the same quality of coal, the Commission, by not examining all these relevant aspects, is shirking its responsibility of protecting larger consumer interest, with such a casual approach. In view of change of guard in the Commission, I once again request the Commission to re-examine the issue and take appropriate decisions as requested above.” It is reported that TS Genco intends to import coal for its projects. It was also reported earlier that Hon’ble Chief Minister of Telangana Sri K Chandrasekhar Rao garu had directed TS Genco to get boilers of new projects designed to use imported coal, claiming that indigenous coal

was not available, contrary to his repeated claims before elections that coal from Singareni Collieries Company Limited would be available for setting up thermal projects to the tune of 10,000 MW in Telangana.

- c) **FIXED COST AND PPA OF HNPCL:** Claiming availability of 53.89% share from the Hinduja project (two units of 520 MW each) to Telangana State, with energy availability of 3449 MU for 2015-16, the Discoms have maintained that “indicative fixed cost for KTPP II, Krishnapatnam and Hinduja have been considered.” For two units of Krishnapatnam, the Discoms have considered fixed cost of Rs.1162 crore and a variable cost of Rs.2.48 per unit and for Hinduja fixed cost of Rs.638 crore (AP Discoms have considered fixed cost of Rs.1028 crore) and variable cost of Rs.2.29 per kwh. Whereas “fixed costs have been considered as projected by the appropriate generating stations”, the Discoms have claimed. What are the fixed costs actually projected by Hinduja and AP Genco’s Krishnapatnam and TS Genco’s KTPP II projects? The Discoms have informed that HNPCL has submitted tariff proposals for its plant under cost plus basis before APERC for approval and that the same is pending. Have the Discoms signed final PPA with HNPCL and submitted the same to appropriate ERC for its approval? In their responses to my queries on ARR and tariff proposals for 2014-15, the Discoms had replied that they and HNPCL were likely to sign the PPA on 31.3.2014. In their ARR proposals for 2014-15, the Discoms informed that “the licensees have considered the fixed and variable costs for upcoming HNPCL power plant to be same as the costs for NPTC Simhadri Stage II. However, actual tariff would be subject to approval of Hon’ble Commission.” In this connection, I would like to reiterate what I had submitted on this issue relating to ARR and tariff proposals of the Discoms for 2014-15: “The Discoms have shown the cost of power from NTPC Simhadri stage II as Rs.3.74 per unit. The State Government has directed the Discoms to enter into a ‘continuation agreement to the PPA of

The Coal linkages for the Power stations generally will be allocated by standing linkage committee long term (SLCLT), Ministry of Coal , Gol. The existing power stations (KTPS,KTPP and RTS-B) of TSGENCO are linked to SCCL as per the linkage approved by Gol. The new project proposed by TSGenco are designed to utilize both indigenous coal and imported coal.

The Variable Cost of Simhadri STPS is considerably high when compared to the Variable Cost of HNPCL as 40 % of required Coal is being imported for the Simhadri STPS.

The NTPC is using 60 % of indigenous Coal and 40% of imported Coal for the Simhadri Super Thermal Power Station in view of the shortage of indigenous Coal.

The HNPCL has yet to start generation and Variable Cost arrived by HNPCL is based on 100 % of indigenous Coal

1998 with M/s HNPCL', they had explained earlier. When the so-called continuation agreement is still pending and the Commission's consent to the same is to be sought, and when the Discoms have not explained whether HNPCL has agreed to the tariff on par with that of NTPC's Simhadri stage II, what is the sanctity or legality in the Discoms proposing to purchase power from HNPCL at the presumed or speculative rate? If the Commission permits the Discoms to purchase power from HNPCL accordingly, without holding public hearing on PPA, if signed between the Discoms and the project, and giving consent to the same, it may lead to bungling and legal litigation later." If the Discoms and HNPCL have not signed PPA so far, what are the reasons for the same?

d) RECOVERY OF RS.2081.81 CRORE FROM APGENCO: In its order dated 31.5.2014 in O.P.No.15 of 2009 and IA Nos.3 of 2010, 9 of 2011, 21 of 2013 and 36 of 2013 in OP No.15 of 2009, APERC directed APGENCO to adjust a difference of Rs.2081.81 crore between the tariff already collected from Discoms and the tariff approved for specified years and projects mentioned therein before 31.12.2014. Was that amount adjusted by APGENCO, as directed by the Commission? If not, what steps are the Discoms taking to recover the same from TSGENCO (and APGENCO)? Since no mention is made of adjustment of that huge amount in the form of true-down by the Discoms in their ARR for 2015-16, I request the Hon'ble Commission to deduct that amount from annual revenue requirement, including claims of true-up, projected by the Discoms (proportionately for TS Discoms) with a direction to them to recover the same from TSGENCO (and APGENCO), if not already adjusted or recovered.

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

e) QUESTIONABLE REVISED ESTIMATES OF AGRICULTURAL CONSUMPTION: It has become a standard practice for the Discoms to project inflated agricultural demand and for the Commission to reduce the same and for the Discoms to show revised estimates of higher consumption for agriculture. Genuine criticism is being voiced every year that a part of transmission and distribution losses is being included in agricultural consumption. Even while showing overall sales below the levels permitted by the Commission, both the Discoms have shown agricultural consumption exceeding the levels permitted by the Commission by 406 MU for TSNPDCL and an increase for 2014-15 to 37.28% from 32.87% in 2013-14; and by 1116.57 MU for TSSPDCL for the year 2013-14 and an increase for 2014-15 to 22.98% from 20.95% in 2013-14. Since the scheme of free supply of power to agriculture is being implemented and Government is providing subsidy, in addition to cross subsidy, the Commission should not permit true-up of expenditure for revised excess consumption for agriculture and the same should be provided as additional subsidy by the Government. Since the Government has agreed to provide substantial subsidy for 2015-16, it can be presumed that the same covers expenditure for revised excess consumption for agriculture.

The licensee has been estimated Agriculture consumption based on ISI methodology as approved by the Hon'ble Commission from October 2013 onwards.

Agl consumption estimation in TSNPDCL is being carried-out on the basis of ISI Methodology wherein energy meters are provided to the selected DTRs (Sampled DTRs) and the average consumption recorded in a given capacity of the DTR is calculated. This average consumption multiplied by the total number of the same capacity DTRs will be the total Agl consumption on the capacity of DTRs. Similarly, the total Agl consumption on the other capacities of DTRs is arrived. The total Agl consumption on all the capacities of DTRs (16 KVA, 25 KVA, 63 KVA & 100 KVA) will be the total Agl consumption estimation in TSNPDCL.

In TSNPDCL, the total number of Agl DTRs of the capacities said above, is 1,28,011. Out of the, energy meters were provided on 3,168 DTRs of the above said DTRs. The readings from these energy meters are taken every month and arriving monthly Agl consumption estimation.

Also, it is planned to provide energy meters to 10% of the total existing Agl DTRs and hence the accuracy of Agl consumption estimation will be improved further.

Based on the above actual estimated Agl consumption of H1 of 2014-15, the licensee expects growth rate of 4.00% for the H2 of FY 2014-15 and FY 2015-16 over the H2 of FY 2013-14 and revised estimates of FY 2014-15.

		<p>The Hon'ble Commission has approved Agl sales same level of FY 2012-13 for the FY 2013-14 and in the FY 2014-15 there was no tariff order and approved sales. In this regard, the actual Agl sales of the Licensee have been exceeded over the approved Agl consumption.</p> <p>However, as per the previous FSA regulation and amended Regulation 4 of 2005, the Commission is allowing Agl sales limited to Tariff Order quantities while calculation FSA and true up for retail supply business.</p>
	<p>f) NON-CONVENTIONAL ENERGY, ENDLESS LITIGATIONS AND TARIFF HIKES : Regarding the detailed account on how litigations with non-conventional energy units have been going on endlessly and how tariffs for the same are being increased over the years, with the kind of policy decisions being taken by the Governments and orders being given especially by the Regulatory Commission and Appellate Tribunal, desirability of entering into long-term PPAs with private NCE units has become questionable with consumer interest becoming a casualty. Encouragement to non-conventional energy does not mean going on a spree of entering into long-term PPAs with private developers and increasing tariffs for the same. Even in the face of projected availability of surplus power, entering into long-term PPAs with private developers to purchase non-conventional energy is leading to higher costs for power purchase, as the rates at which different kinds of NCE shown in the ARR make it abundantly clear. Therefore, I request the Hon'ble Commission to reduce the percentage of NCE power to be purchased by the Discoms from the 5% determined by it under the existing Renewable Power Purchase Obligation order. Even then, the quantum of NCE power the Discoms have to purchase would increase in absolute terms in view of increasing sales of power. Fillip should be given to Research & Development for technological development and improvement to reduce cost of generation of</p>	<p><u>RPPO:</u></p> <ul style="list-style-type: none"> • The Regulation No. 1 of 2012 dealing the Renewable power purchase obligation (RPPO) was issued by the erstwhile APERC in the year 2012 with mandatory purchase of RE (NCE) power with a quantum of 5% from total purchases (out of which 0.25% from solar sources) in a Financial year by obligated entities, viz, Distribution Licensees, Open Access and Captive Consumers. • The quantum of energy to be purchased by distribution licenses is to be re- looked into by considering the AP Reorganization Act-2014 (bifurcation of States). Issuance of fresh RPPO obligation is necessitated by considering the existing RE capacity as of now along with expected capacity in FY 2015-16 may be taken as initial base percentage quantum of RE energy mandated. It may be appropriate to increase by 10% in each subsequent year.

	<p>NCE power especially solar and wind power. Instead of inviting bids and entering into long-term PPAs with private developers at higher costs especially for solar power, TSGENCO should be encouraged to fully make use of the incentives being given by the Gol and the State Government for setting up solar energy units and the power generated by them be supplied to agriculture during day time. That would help avoiding the kind of problems farmers cultivating under wells and borewells are facing due to staggered supply of power in two or three spells even during the night. If necessary, the Government has to provide necessary additional subsidy for the same.</p>	<ul style="list-style-type: none"> • Notwithstanding the above, the maximum ceiling of RPPO of 5% may be limited to 3% during the control period, thereby less burden on DISCOMs to purchase, there by deduction in retail supply tariff to the consumers. <p><u>Solar plants by GENCO:</u></p> <ul style="list-style-type: none"> • The issue of establishing the solar plants by TSGENCO by utilizing the incentives provided by Gol and GoTS is not in the purview of TS Transco/TSDISCOMs.
	<p>g) REDUCTION OF DISTRIBUTION LOSSES: The financial impact of failure of the Discoms in achieving targets of reduction of distribution losses as determined by the Commission should not be permitted to be included in ARR and collected from the consumers. As the Discoms themselves have admitted, there is scope for further reducing distribution losses, both technical and commercial. To the extent the Hon'ble Commission disallows excess agricultural consumption of power claimed by the Discoms, that should be added to distribution losses. Accordingly, I request the Hon'ble Commission to fix targets of reduction of distribution losses realistically not only Discom-wise but also circle-wise to infuse a sense of accountability at various levels, since there is a vast difference in distribution losses among various circles.</p>	<p>TSDISCOMS would strive for achieving the loss trajectory as specified by the Hon'ble Commission. TSDISCOMS also humbly submit to the Hon'ble Commission that it should either allow projection of Agriculture sales based on the actual sales and provide a low loss trajectory or disallowed Agl sales be recognized as losses and loss trajectory devised accordingly.</p>
	<p>h) TRUE-UP CLAIMS: The veracity and permissibility of true-up claims of the Discoms need to be examined thoroughly and pruned accordingly. Based on the information, without all the required details, submitted in the ARR volumes, it is not possible for us to examine and come to a conclusion on the veracity and permissibility or otherwise of true up claims of the Discoms. A separate public hearing on true up claims, making all relevant details available, is required, as has been the past practice with regard to FSA claims of the Discoms.</p>	<p>The True-up has been submitted by the licensee as per Clause 10 of the Regulation No. 4 of 2005. Hence the licensee has included the true-up claims for the control period in the current ARR (Aggregate Revenue Requirement) filings for the purpose of passing of gains/losses to the consumers.</p>

i) **MAXIMUM CEILING PRICE FOR SHORT-TERM PURCHASES** : Regarding directive given by APERC in its tariff order for 2013-14 on maximum ceiling on purchase price through short-term sources, the TS Discoms have replied that “the APPCC has finalized short term power purchases of 2000 MW RTC power on firm basis from 30.05.2014 to 28.05.2015, fixing the rates as follows: Generators located outside the State at Rs.3.52. Generators located within the State Rs.5.45 per unit.” For purchase of short-term power, competition should be among all interested suppliers, irrespective of locations from which they supply power. The Discoms have projected “possible price of Rs.6 per unit” for 2015-16. From which individual generators/traders the Discoms are/will be purchasing power on short-term basis, how much quantum, for which period and at what prices? The neo-liberal policies of the Central and State Governments in hindering progress of public sector utilities and pampering private sector units, often with scandalous proportions, in fuel and power sectors are leading unjustifiably to all-round imposition of additional burdens on consumers. They create scarcity for fuels and power, on the one hand, and in the name of reducing or overcoming scarcity for power and avoiding power cuts, resort to entering into contracts to purchase power especially on short-term basis at very high prices, on the other, all in the name of serving consumers, but serving private vested interests in practice. Implementing saner policies to ensure generation and supply of power at prudent costs to consumers availing all possible opportunities in a given situation is the real yardstick to judge whether the policies of the Government are pro-people or not. Judging by this yardstick, the policies of the Governments are anti-people and pro-corporate sector. In this connection, we welcome the repeated statements made by CM Sri Chandrasekhar Rao garu that new projects would be implemented by TS Genco as a step in the right direction. However, it is necessary to ensure that the projects are implemented in time and efficiently, confining cost of the projects to prudent levels, and leaving no

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

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

	<p>scope for manipulations and avoidable cost escalations, in view of adverse findings in the reports of the Comptroller & Auditor General of India earlier on implementation of some of the projects by AP Genco.</p>	
8.	<p>8. DIRECTIVE ON MONITORING OF COST OF IMPORTED COAL PROCURED BY APGENCO AND NTPC NOT COMPLIED WITH : In response to several objections raised during public hearings, in its tariff order for 2013-14, the then APERC in the undivided Andhra Pradesh directed the Discoms: "The Discoms are directed to verify whether APGENCO is procuring imported coal through competitive bidding process, or under any guidelines issued in this regard by GoI, before admitting the Station wise power purchase bills claimed by APGENCO. Regarding NTPC Stations, DISCOMs have to take up the pricing issue of imported coal, if any, with CERC." After a gap of nearly two years, the TS Discoms have replied: "TSGENCO is not utilizing imported coal." This reply is strange and evasive, as if the responsibility of TS Discoms were confined to monitoring cost of imported coal, if only TS Genco imported and used the same, and ignoring the fact that they are getting power from projects of AP Genco and NTPC also. Therefore, I request the Hon'ble Commission to issue appropriate directions to TS Discoms in this regard. The Discoms also have replied : "TSGENCO projected its total coal requirement for FY 2014-15 as 131.60 Million Tons (MMT), as per Fuel Surcharge (Supply) Agreements the linkage is 106.70 MMT and the shortfall is being met by procuring additional quantity of Coal from M/s SCCL." Is TSGENCO procuring additional quantity of coal from SCCL at the same price that is being paid for allocated coal of same grade or is it paying higher price for coal of same grade purchased additionally?</p>	<p>TSGENCO power stations are having coal linkage of 10.67 MT/Annum (SCCL-8.36MTPA & MCL-2.31MTPA) against the requirement of 13.16MT for the FY 2014-15. The linkage materialization from MCL is in order of 40%. To meet the requirement SCCL is supplying additional quantity over and above the linkage quantity. M/s.SCCL is claiming additional price for supply of additional quantity. However, the issue of payment of additional price to SCCL is under correspondence.</p>
9.	<p>9. IMPACT OF IMPORTED COAL: In its tariff order for 2013-14, APERC had directed the four Discoms: "Distribution Licensees are directed to take up the issue of variation in GCV (lower GCV of blended coal than indigenous coal) of CG stations with NTPC and report compliance by 30th September, 2013. Licensees are directed to take up the matter with APGENCO for a critical examination of the variation in GCV and submit a report to the Commission by 30th</p>	-

September, 2013.” The TS Discoms have given the same strange reply : “TSGENCO is not utilizing imported coal.” When blended coal, imported and indigenous, is being used for generation of power, only average GCV would be available which must be above the GCV of indigenous coal when imported coal is costly and its quality is superior to that of indigenous coal. Is NTPC showing the quantum of imported coal used in specific stations and its cost, and whether its assured GCV is realized in actual usage separately in monthly bills? Or is NTPC showing average cost and GCV of coal - supposed to be a blend of imported and indigenous coal – of all its stations in the country for every one of its stations, irrespective of actual utilization or non-utilization of imported coal, its quantum and price in its monthly bills to the Discoms? Regarding quality of domestic coal, APERC had directed the Discoms : “The Discoms are directed to appoint independent coal auditors to ensure that the coal of agreed quality and price as per fuel supply agreement (FSA) is used for generation of power at all coal based Thermal Power Stations. Before making final payment such audit reports should be verified by the concerned officers of the DISCOMs.” When the TS Discoms have replied that “TS & AP DISCOMS submitted in FY 2013-14 to the Hon’ble Commission (that it) may take a view on this aspect duly considering the Punjab ERC directions in the similar matter,” they have deliberately ignored the fact that the Commission had given this directive in the tariff order for 2013-14 after the same submission was made by the Discoms. In view of the evasive replies given by the Discoms, I request the Hon’ble Commission to issue necessary directives to the Discoms and direct them to submit in detail relevant particulars like quantum, quality, price and assured GCV of imported and indigenous coal used by NTPC and APGENCO in each thermal station separately which supplies power to the Discoms. I also request the Hon’ble Commission to permit or reject, fully or partly, the cost of power purchase station-wise or unit-wise based on submission or non-submission of required particulars relating thereto and after examining the same thoroughly.

10.	<p>10. RECOVERY OF DEMAND CHARGES FROM APGPCL: In response to the issue of recovery of demand charges from APGPCL raised by us, consequent to the orders issued by APERC, vide letter No.APERC/E-205/DD/Dist/2009 dated 6.5.2010, the Discoms replied that the amounts estimated by APPCC are around Rs.5 cr. and that necessary steps are being taken for recovery of the amount from APGPCL. Further, the amount foregone by DISCOMS towards difference of MD charges in H.T. consumers C.C. Bills will be calculated and necessary steps for recovery of the same will be made in due course, the Discoms replied. APERC directed the Discoms to file a comprehensive action taken report with details of excess amounts paid and extent of recovery made (Para 82 of Tariff Order for 2011-12). How much was the excess amount and how much was recovered from APGPCL?</p>	<p>Notices were issued to all the consumers for recovery of demand charges in respect of APGPCL. M/s APGPCL has filed writ petition in the Hon'ble High Court vide WPNO. 24594 of 2011 on the notices issued by the Discom to their shareholders.</p> <p>The counters were filed in Sep-2011 by the Discoms and the same was admitted by the Court.</p> <p>As the case has been pending for a long time, once again counter affidavit filed on 16.02.2013 by Discoms for vacating the stay petition. The case is still pending and the realization of amounts is subjudice</p> <p>The inflated demand charges (Rs5,05,90,298)in respect of APDISCOMS share in APGPCL stage-I were already recovered from February and March CC bills of 2011.</p> <p>Further an amount of Rs 4,45,94,346/- have been recovered towards inflated demand charges in respect of participating industries. Further APGPCL had approached Hon High Court and the same is sub judice.</p>
11.	<p>11. REJECT PROPOSALS FOR TARIFF HIKE: Considering the above submissions, availability of surplus power, besides the subsidy implied to be provided by the Government, among others, I request the Hon'ble Commission to reject the proposals of the Discoms for tariff hike for 2015-16.</p>	<p>In the Tariff Order for FY 2013-14, the average Cost to Serve (CoS) as approved by the Hon'ble Commission for the Telangana was Rs 5.46/Unit. Since then, there has been a significant increase in the average CoS during the year and the licensee expects the trend to continue for the ensuing year.</p>

		<p>The Licensee estimates the state level CoS for the year FY 2015-16 to be at Rs. 5.98/Unit. This implies that an increase of Rs.0.52/ Unit (10 % increase)</p> <p>The increase in the CoS is due to the following reasons</p> <ol style="list-style-type: none"> 1. The Network cost approved in FY 13-14 was Rs. 0.83/Unit and this has increased to Rs. 1.00 /Unit primarily due to increase in wages of employees, increased Capital Investment of the licensee. 2. The interest costs on the short term loans converted to Long term loan under Financial Restructure plan amounts to Rs. 141 crores has also increased the ARR in FY 2015-16. 3. The Licensees has projected a consolidated revenue deficit for FY 13-14 and FY 14-15 to the tune of Rs. 1463 Crs. The high revenue deficit for the period is primarily due to increase in Power Purchase cost, Network cost and other cost in FY 14-15 and no tariff revision in FY 14-15. <p>Hence, the Distribution licensee feels that the increased CoS should reflect appropriately in the tariff structure. Hence, the licensee proposes the tariff revision for various categories</p>
12.	<p>12. MEASURES NEEDED TO ENSURE ADEQUATE SUPPLY OF POWER TO CONSUMERS AT REASONABLE TARIFFS : Strengthening public sector utilities like TS Genco and NTPC to take up and implement proposed and new projects in time by providing necessary budgetary allocation for meeting equity, allocating and ensuring timely supply of adequate quantum of fuels required by them on priority basis and ensuring fair bidding</p>	<p>The Discoms, Transco and Genco are alive to the challenges highlighted by the objector and following are some of the key steps been taken to address the concerns</p>

	<p>processes for implementing projects with least possible capital cost; taking concerted measures in a planned manner to ensure growth in production of fuels like domestic coal and natural gas by giving priority to the public sector units in those areas, fixing prices of fuels in a rational manner based on prudent capital and operating costs and reasonable profit; clearing dues, if any, to the Discoms by the State government for additional power purchased at its behest earlier, improving efficiency of government's power utilities; effective measures for further reducing transmission and distribution losses, curbing theft and pilferage, collecting dues from consumers; implementing energy conservation measures in a phased manner based on cost-benefit analysis; avoiding manipulative terms and conditions in power purchase agreements with private power projects ; paying special attention to research and development to tap sources of renewable energy in an economical way gradually and fixing their tariffs in a prudent way are some of the main measures required to ensure adequate supply of power at reasonable tariffs to meet growing demand of consumers.</p>	<p>TS Genco</p> <p>Following capacity additions (thermal) are been planned</p> <ul style="list-style-type: none"> - KTPP Stage II – 600 MW - KTPS Stage VII – 800 MW - Manuguru 1080 MW - Damarcherla A 1200 MW - Damarcherla B 3200 MW - KTPS Stage VII – 800 MW <p>In addition 250 MW from Hydel sources are planned. Issue of low PLFs due to coal shortage is been taken up with Coal India at all forums for resolution.</p> <p>Further an MoU is entered with govt of Chattisgarh for supply of 1000MW</p> <p>TSNPDCL is taking the following measures for reduction distribution losses</p> <p>Theft control, proper categorization of services, replacement of elctromechnical meters with electronic meters, shifting of meters from inside to outside of the house, replacement of defective meters on monthly basis, regularization of unauthorized services, sealing of meters</p>
13.	<p>13. CLAIMS OF TRUE UP & MYT: The Discoms have sought true up of additional expenditure or ARR deviation for 2013-14 and 2014-15. Leaving aside the permissibility or otherwise of such claims, a few relevant issues need to be taken note of here. Since FSA was repealed from 2013-14 onwards by the Commission, the Discoms claim that they are seeking true up for the revised revenue gap for 2013-14, contrary to their earlier claim that they “expect minimal or no FSA for FY 2013-14 with the proposed ARR.” It</p>	<p>It can be observed that for FY 13-14, TSDISCOMS have either projected a True-down or a very minimal true up amount. Hence, the statement “expect minimal or no FSA for FY 2013-14” holds true. Since, there is no tariff increase for FY 14-15, the true up amount is significant. Hon’ble Commission has allowed for True-up of Retail business on an annual basis considering</p>

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

the difficulties in either recovering true up at the end of the control period or filing FSA on a quarterly basis.

	<p>payments in advance for future requirements. Therefore, such claims should be permitted separately as a one-time payment, without considering them for hike in tariffs.</p>	
14	<p>14. ADDITIONAL BURDENS DUE TO FAILURES OF GOI AND RIL : The deliberate failure of the Government of India in ensuring supply of domestic coal and natural gas to the power projects in the State as per allocations made by it is leading to under-utilisation of existing installed capacity. As a result, the Discoms are forced to purchase power in the open market from merchant power plants and power traders at higher prices, on the one hand, and get power generated with costly imported coal, on the other, to reduce power shortage. Instead of increasing production of natural gas in the D6 field of KG basin to 80 million metric standard cubic meters per day (MMSCMD), Reliance Industries Limited has reduced it considerably. Due to the failure of RIL and the GoI to ensure production and supply of natural gas as per allocations made, the plant load factor (PLF) of the four old private power projects is projected to be 30% and of the four new private power projects of GVK extension, Gautami, Vemagiri and Konaseema as zero during the next financial year by the TS Discoms. Due to failure of Reliance Industries Limited in supplying natural gas as per allocations made, (and by ONGC, Cairn, etc. to some extent) huge installed capacity of the existing projects with whom the Discoms had power purchase agreements is lying idle. The average cost of gas-based power even at the unjustifiable high cost of natural gas of the US\$ 4.20 per MMBTU is about Rs.3 per unit. While production and supply of natural gas has come down, the erstwhile UPA Government had decided to enhance the price of natural gas to \$ 8.4. per MMBTU based on an irrational formula worked out by the Rangarajan committee. Fortunately, that decision was put on hold as a result of the directive issued by the Election Commission in view of the scheduled elections to the Lok Sabha. However, the NDA Government has increased the price of natural gas to \$5.65 per MMBTU without any justification and without even making public on what basis or principle it has done so. It is increasing the cost of generation of power and power purchase cost and leading to</p>	<p>This subject is not under the purview of TSDISCOMS</p>

	<p>imposition of additional burdens on consumers of power. While RIL had quoted a price of \$ 2.34 per MMBTU in an international bid floated by NTPC in the past, the empowered group of Ministers headed by the then Finance Minister, Sri Pranab Mukherjee, had decided a price of \$ 4.2 per MMBTU based on a contrived formula submitted by RIL. That price was linked to the price of international Brent crude oil at US\$ 60 per barrel. Even going by that irrational formula, the price of natural gas has to be reduced in view of slump in the price of crude oil in the international market well below \$ 60 per barrel. Strangely, there is no word of protest against the unjustifiable hike in price of natural gas from the Governments of Telangana and Andhra Pradesh, leave alone demanding the Gol to reduce the price rationally.</p>	
15.	<p>15. DISCOMS SHOULD NOT SUPPLY POWER TO RESCOs AT LESS THAN COS : Discoms and Rescos are independent entities. The Discoms should not be permitted by the Commission to supply power to Rescos at less than the cost of service and impose additional burden on the consumes of Discoms. If Rescos are to be supplied power at concessional rates, it is for the Government to provide them subsidy.</p>	<p>The licensee has provided power supply to the RESCO Sircilla at bulk supply tariff under HT Category approved by the Hon'ble Commission. In view of the above tariff mechanism followed for the RESCO, the State Government subsidy has not been extended to RESCO and same is being extended to distribution licensee only.</p>
16.	<p>16. HOLD SPECIAL PUBLIC HEARING ON FUNCTIONING OF THE COMMISSION : I request the Hon'ble Commission to hold a special public hearing, seeking suggestions from the public on its functioning itself, so that the present team of the Commission can get acquainted with the blunders committed in the past and improve and strengthen its functioning to protect larger consumer interest by acting independently, democratically, objectively, efficiently, transparently and in an accountable manner and gain respect and confidence of the people at large. The Commission should hold public hearings on all petitions and issues which will have financial bearing on the tariffs to be paid by the consumers.</p>	<p>Under the purview of Hon'ble Commission</p>
17.	<p>17. UNWARRANTED DELAY IN SUBMISSION OF ARR AND TARIFF PROPOSALS BY THE DISCOMS : The delay for more than two months in submitting ARR and tariff proposals by the Discoms to the Hon'ble Commission lacks justification. As a result</p>	<p>The delay in filings by the licensee is mainly due to : Consequent to the state bifurcation on June 2nd 2014, for TSNPDCL, 7 mandals of Khammam</p>

of this avoidable delay, the Commission, obviously, with a view to completing the regulatory process and giving its tariff order for 2015-16 in time to be effective from 1st April, 2015, could not give the normal one month period for interested public to submit their suggestions and objections. After the Discoms submitted their tariff proposals to the Commission, and after publication of advertisement on 11.2.2015, calling for suggestions and objections, copies of ARR with tariff proposals were made available. As such, we have about twenty days to study the voluminous submissions of the Discoms and prepare our suggestions and objections and submit the same by the 7th March. (We have to do similar work in the case of ARR and tariff proposals of AP Discoms also) In view of paucity of time, some very important issues only could be covered in our objections and suggestions. From 12th March, the Hon'ble Commission is going to hold public hearings. It leaves inadequate time to the Discoms to send replies to the suggestions and objections filed and for us to study the same and prepare further submissions to be made during the public hearings. It leaves inadequate time to the Hon'ble Commission also to examine the suggestions and objections of the interested public and prepare and issue tariff order for 2015-16 by the 23rd March to make it effective from 1.4.2015. Also, I request the Hon'ble Commission to direct the Discoms to send their replies to my objections and suggestions by email followed by hard copies in time to enable me to study the same and make further submissions in person during the public hearings.

District have been diverted and reassigned to APEPDCL. As the MYT tariff order issued by the Commission includes ARR of 7 mandals of Khammam District for TSNPDCL, it is required to revise the Distribution costs for 3rd control period for FY 2014-15 to FY 2018-19. Hence the licensee has to segregate the financial statements in the event of state bifurcation as it forms the basis for revision of the Distribution costs from FY 2014-15 to FY 2018-19 and also needs time for firming up power/fuel availability and cost thereof from various sources. Due to delay in preparation and receiving this information which would have a material impact on the overall ARR for the ensuing year and the measures to be adopted by the licensee in addressing it, the licensee is forced to submit the filings with delay so as to finalize the distribution costs and power purchase cost projections accurately.

The purpose of filing objections is to receive the comments of the consumers broadly about the claims made by the Discoms, thereby the Hon'ble Commission would be obligated to examine the said claims in detail from the stand point of the objections that was raised by consumer/s. No part of the existing regulations mandates requirement of thirty days time.

However, the time given by the Hon'ble Commission is almost 1 month which is reasonably sufficient to respond on the claims of the Discoms.

M.Kodanda Reddy

Sl.No	Summary of Objections / Suggestions	Response of the Licensee																
1	Farmers are being vilified as being the source of problems facing the power sector in the State principally because of free power supply to agriculture pump sets assured by the government. Here it has to be empathetically noted that even though, most of the farmers with electrified pump sets get free power, DISCOMs in the State do not supply it free as they receive the cost incurred in supplying electricity to pump set farmers in the form of subsidy from the State government and cross subsidy from subsidizing industrial and commercial consumers. The DISCOMs are duty bound to supply quality power to pump set farmers. But these farmers are at the receiving end.	6 to 7 Hrs quality supply in 2 spells is being extended to Agl sector. Out of which one spell is in day time.																
2	In Telangana State more land is being irrigated by wells compared to surface/canal irrigation. Free power to agriculture was promised to keep the pump set farmers on equal footing with farmers under surface irrigation. Even the budgetary allocation to power sector is always less than irrigation sector. For example, in the budget of undivided AP for the year 2014-15 while only Rs. 8,454.48 crore were allocated to power sector irrigation sector got Rs. 23,311.98 crore. At the same time it has to be kept in mind that only a portion of allocation to power sector goes towards subsidizing power supplied to agriculture pump sets.	The issue is not under the purview of the Licensee.																
	<p>Estimation of agriculture consumption</p> <table border="1" data-bbox="279 1239 989 1382"> <thead> <tr> <th></th> <th>2013-14</th> <th>2014-15</th> <th>2015-16</th> </tr> </thead> <tbody> <tr> <td>NPDCL</td> <td>4,348</td> <td>4,715</td> <td>4,904</td> </tr> <tr> <td>SPDCL</td> <td>6,694</td> <td>7,238</td> <td>7,528</td> </tr> <tr> <td>Total</td> <td>11,042</td> <td>11,953</td> <td>12,432</td> </tr> </tbody> </table>		2013-14	2014-15	2015-16	NPDCL	4,348	4,715	4,904	SPDCL	6,694	7,238	7,528	Total	11,042	11,953	12,432	
	2013-14	2014-15	2015-16															
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3	<p>Filings of NPDCL as well as SPDCL shows that power consumption in the agriculture sector in Telangana is increasing irrespective of the situation on the ground. The above consumption figures are arrived at by the DISCOMs on the basis of their claim that they are supplying power for 7 hours per day (p.64, SPDCL). This is far from truth. Most of the time, farmers are not receiving not even four hours of supply in a day. As such the Commission shall not take the above consumption figures in to account..</p>	<p>In the current and previous year, the licensee has imposed the load restriction to certain categories such as domestic, commercial and industrial consumers to maintain grid stability under insufficient power availability duly maintaining 7 Hrs per day power supply to Agriculture consumers to the maximum extent possible. In FY 2015-16, the licensee expects that availability of power will improve on account of upcoming new generation power plants i.e., KTPP Stage-II, lower Jurala, Pulichinthala, Tuticori, Krishanptnam Stage-I & II, Hinduja and short term power procurement. In view of the above, the licensee shall provide 7 Hrs power supply to the Agriculture consumers.</p>
4	<p>The fact that the agriculture consumption figures provided by the DISCOMs are anomalous comes out from their filings. According to their filings while 9,78,028 pump sets under SPDCL will be consuming 7,528 MU during 2015-16, under NPDCL 10,73,870 pump sets will be consuming 4,904 MU. In other words per pump set consumption will be 7,528 units under SPDCL, it will be 4,567 units in the case of NPDCL. Per pump set consumption in SPDCL will be nearly 70% higher compared to NPDCL, even while hours of supply of electricity are the same under both DISCOMs.</p>	<p>NPDCL is arriving Agl consumption based on ERC ISI methodology only and submitting the consumption to the Hon'ble Commission every month.</p>
4	<p>Subsidy towards free power to agricultural services is being provided on the basis of 7 hours of power supply to these services. But in reality farmers are getting power for less than five hours. This implies that DISCOMs were compensated more than necessary to supply free power to agriculture. The excess subsidy paid to DISCOMs in this regard shall be recovered</p>	<p>The actual consumption for Agl Category is more than the approved consumption by Hon'ble Commission in the respective Tariff Orders. However, the Government subsidy towards agriculture consumption for the year is provided as per approved Agl consumption in the Tariff Order issued by the Hon'ble Commission.</p>
5	<p>In the absence of metering of agricultural connections DISCOMs claimed that they have arrived at these figures following the ISI methodology suggested by the Commission. But data collected under this methodology is also not complete. To overcome this we suggest that all DTRs serving the agriculture services should be</p>	<p>Agl consumption estimation in TSNPDCL is being carried-out on the basis of ISI Methodology wherein energy meters are provided to the selected DTRs (Sampled DTRs) and the average consumption recorded in a given capacity of the DTR is calculated. This</p>

	<p>metered so that the consumption estimates are realistic. The Task Force on electricity Sector appointed by the Government of Telangana State also suggested metering of DTRs serving agriculture loads.</p>	<p>average consumption multiplied by the total number of the same capacity DTRs will be the total Agl consumption on the capacity of DTRs. Similarly, the total Agl consumption on the other capacities of DTRs is arrived. The total Agl consumption on all the capacities of DTRs (16 KVA, 25 KVA, 63 KVA & 100 KVA) will be the total Agl consumption estimation in TSNPDCL.</p> <p>In TSNPDCL, the total number of Agl DTRs of the capacities said above, is 1,28,011. Out of the, energy meters were provided on 3,168 DTRs of the above said DTRs. The readings from these energy meters are taken every month and arriving monthly Agl consumption estimation.</p> <p>Also, it is planned to provide energy meters to 10% of the total existing Agl DTRs and hence the accuracy of Agl consumption estimation will be improved further.</p>
6	<p>Supplying electricity to agriculture during night time is leading to inefficient use of electricity as well as water. As farmers are not sure about timings of electricity supply in the night they mostly keep the electric pump sets on automatic starters. As and when electricity comes electric pump set starts pumping out water and due to lack of visibility as well as in the absence of farmers in the field at this time the same field will be watered again and again leading to inefficient use of water and electricity. To avoid this we request the Commission to direct the DISCOMs to supply electricity to agriculture during day time only.</p>	<p>6 to 7 Hrs per day power supply to the Agl consumers is being extending in two spells in a day to maintain grid stability.</p>

Deaths due to shocks																																				
		2013-14	First half of 2014-15																																	
	NPDCL	185	87																																	
	Mahabubnagar	115	69																																	
	Nalgonda	84	25																																	
	SPDCL	251	129																																	
	Total Telangana	436	216																																	
7	The DISCOMs did not provide complete details of these incidents like for how many cases DISCOMs took responsibility and in how many cases compensation was paid and amount paid towards compensation. NPDCL mentioned that compensation was paid in 56 cases out of 185 deaths in 2013-14 and in 11 cases out of 87 deaths during the first half of 2014-15. Procedures need to be simplified to see that all victims receive compensation at the earliest.			<p>Every effort is being made to avoid accidents, by taking up regular maintenance works like replacement of conductor, providing of inter poles , maintenance of DTRs structure and LT lines, providing of earthing. Wide publicity being given requesting Ryots not to handle with Distribution Transformers. During the FY 2014-15 the licensee has erected 4177 middle poles in the loose lines with an expenditure of RS 1.89 Crs, 23207 locations in various lines were rectified to avoid accidents.</p> <p>Further works were awarded to erect 200 middle poles in each section in Discom in the coming 3 months.</p> <p>Non Departmental Fatal accidents in NPDCL</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th colspan="3">2013-14</th> <th colspan="3">2014-15 up to 2/2015</th> </tr> <tr> <th>Human</th> <th>Animal</th> <th>Total</th> <th>Human</th> <th>Animal</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Reported by field</td> <td>159</td> <td>298</td> <td>457</td> <td>156</td> <td>172</td> <td>328</td> </tr> <tr> <td>Exgratia sanctioned by the department</td> <td>27</td> <td>132</td> <td>159</td> <td>76</td> <td>122</td> <td>198</td> </tr> </tbody> </table>							2013-14			2014-15 up to 2/2015			Human	Animal	Total	Human	Animal	Total	Reported by field	159	298	457	156	172	328	Exgratia sanctioned by the department	27	132	159	76	122	198
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8	Even in the electrocution deaths that the DISCOMs had taken responsibility the amount paid (about Rs. 1 lakh per person) is very meagre. Even this meagre amount was not paid properly. There is need to revise the compensation upwards like in the case of railways.			<p>As per directions of APERC (Proceeding No.APERC/Secy/EAS/S-101/177/2013, Dt13.08.2013), the NPDCL has enhanced existing ex-gratia amount in case of fatal accidents to non departmental person and animals due to electrocution i.e. Human being from Rs.1 to 2 Lakhs, cattle from RS. 3,000 to Rs. 20,000 and goat and sheep @ Rs.4,000 respectively and sanction procedure is simplified to grant ex- gratia to victims irrespective of the mistake from any side. Further online tracking of accidents taken place in TSNPDCL and reports submission is commenced from 12/2014 to see that all eligible victims receive compensation at the earliest.</p>																																
9	There shall also be separate mechanism to pin responsibility for deaths due to electricity shocks. In the present case perpetrator itself is the judge. To avoid this anomaly a committee comprising different stakeholders shall go into these deaths and pronounce whether DISCOMs are responsible for these tragedies or not																																			

10	<p>More than this these deaths are highly avoidable. These deaths are taking place due to neglect of rural network by the DISCOMs. Every year the Commission allowed Rs. 5 crore to be spent by the DISCOMs on safety measures to avoid such deaths. But DISCOMs did not care to utilise them. NPDCL spent Rs. 34.25 lakh during 2013-14 and Rs. 12.29 crore during first half of 2014-15. If the safety of DTRs were improved many of these deaths could have been avoided.</p>	<p>Rural network is strengthened by incorporating additional improvement of transformers, substations and sanction of HT and LT lines in year 2014-15. Tom-tom is done in the villages not to meddle the DTRs for avoiding the Electrical accidents. The Spacers are used to prevent accidents in case of snapping of LT lines. The 11 KV breakers at 33/11 KV substations are put in trimmed condition for cutting of the power supply in case of snapping of 11 KV conductor. Higher size of conductor is replaced where the lines are overloading.</p>
11	<p>In most of these cases it was the farmers who met this tragic end. These deaths could have been avoided if there were timely and sufficient technical support at the ground level and good quality electrical network. Most of the technical posts like linemen in rural areas are vacant and farmers are forced to attend to repair work on their own with fatal consequences. Thousands of line men posts are lying vacant since a long time. Recently Telangana State Government announced that hundreds of electrical engineers will be recruited shortly. But there is no word about recruiting line men. Filling line men posts not only bring down deaths due to shocks but also help to bring down T&D losses and their by add to the income of the DISCOMs.</p>	<p>Tom-tom is done in the villages about not to meddle the DTRs for avoiding the Electrical accidents. To support the field staff, the labour@ Rs 4000/- per month is deployed in TSNPDCL for extending better services in 250 distributions.</p>
12	<p>Quality of Power</p> <p>Electricity received by the farmers was of uneven quality with unpredictable interruptions. Power supply timings announced by the Licensees are not being adhered to. It is the responsibility of the Commission under Section 86 (1) (i) of the Electricity Act, 2003 to enforce standards with respect to quality, continuity and reliability of service by licensees.</p>	<p>Voltages and quality of power supply to consumers is closely monitored from corporate office level whenever the complaint is received regarding low voltages and poor quality of supply.</p> <p>Everyday 11KV feeder wise electricity supply details are received from field on the same day night hrs and will be reviewed regularly.</p>
	<p>DTR failure/repair</p>	

13	<p>DISCOMs are also not attending to maintenance of DTRs properly. Farmers are being forced to incur expenditure in transporting the DTRs. DTRs are also not being repaired in time. DISCOM staff are also collecting money from farmers to repair DTRs. They are not attending to repairs until the farmers pay up. In Kanugutta village of Both mandal in Adilabad district it took 10 days to repair the DTR. In Madaka village of Odelu mandal in Karimnagar district it took more than one week to repair the transformer while under Standards of Performance DTRs in rural areas shall be repaired within 48 hours.</p>	<p>Presently 3629No.s Healthy DTRs are available under Rolling stock of TSNPDCL and any failed DTR can be replaced with in 24Hrs.</p> <p>Regarding failure of DTR in Kanugutta village of Both mandal in Adilabad district, it is a 63KVA DTR and failed repeatedly on 20-01-2015 and 5-02-2015. The consumers are drawing water from near by Kharat project canal and Peddavagu canal by using unauthorized pump sets and DTR is failing on overload. It is instructed to replace the failed DTR immediately and action may be taken against illegal connections. Further there is no complaint of failure DTR in Madaka with 1week duration in this Rabi season.</p>
14	<p>Low quality of power in rural areas is also because of crumbling transmission and distribution network in rural areas. Decades old conductors are hanging low endangering lives as well as resulting high transmission losses. Many of the DTRs are more than decade old and should have been replaced. Added to this many of these DTRs do not have even AB switches. Depreciated and old parts of T&D network shall be replaced in keeping with prudent maintenance of the network in good health.</p>	<p>The old conductors are replaced in phased manner. The old DTRs having age more than 25yr. and drawing more magnetizing currents are survey reported and replaced with new DTRs. Due to complaint of theft of DTRs and meddling of DTRs, small capacity of DTRs are erected and controlled group of DTRs with one AB switch.</p>
15	<p>Issuing new connections</p> <p>It has become an uphill task for farmers to obtain new electricity connections. Even after paying the required amount through DD farmers are made to run from pillar to post. There is rampant corruption in issuing new connections. Officials do not follow any method in allotting new connections. There is complete lack of transparency in issuing new connections. We request the Commission to lay down transparent norms for release of new agriculture connections including the costs to be borne by farmers towards poles and conductors/service wire.</p>	<p>Agriculture services are being released for the consumers who have paid DDs.</p>

	Billing issues	
16	<p>Agriculture bills combined with domestic bills</p> <p>The DISCOMs continue the process of issuing single bill for domestic as well as agriculture services in the rural areas. When there were delays in paying the bill for agriculture service domestic connection is being disconnected. This is highly objectionable and goes against the rules. We request the Commission to direct the DISCOMs to issue separate bills for domestic and agricultural services.</p>	No integration of agriculture Services with domestic services was done in TSNPDCL.
17	<p>DISCOMs are also not notifying the farmers to which sub-category they belong to. A large number of farmers were receiving notices asking them to pay huge amounts as they belong to a paying sub-category. For example, Nalgonda circle of SPDCL mentioned 3,067 services as falling under wet land farmers holding more than 2.5 acres for the year 2012-13.</p> <p>In the previous year it mentioned only 86 services under this sub-category.</p>	The provision of sub categories will be inserted in the bills of agriculture consumers from 01-05-2015 onwards.
	Wells in the ayacuts of irrigation projects	
18	<p>Pump sets located in the ayacuts of irrigation projects are being categorised as paying connections. Most of these pump sets have come up in the tail ends of irrigation projects.</p> <p>Farmers in these locations have resorted to well irrigation because of lack of water supply from canals. These farmers shall be treated like other farmers.</p>	The licensee is following existing modified free power policy of the State Government. Hence, the reclassification of agriculture consumer category is under the purview of the Hon'ble Commission as per government policy
19	<p>One of the stipulations is that farmers with more than 2.50 acres of land under major and medium irrigation schemes will not be eligible for free power. Here it is to be noted that farmers at the tail end of these projects and under projects like Sreeramsagar whose irrigation potential has drastically come down, though these lands are localized under these irrigation schemes never or rarely get water from the canals. Because of this, they are forced to go in for well irrigation. Though they are treated as irrigated farmers in the government records (irrigation as well as revenue) they do not get benefits of this irrigation. Taking this fact into account we request that the farmers irrespective of their holding size under the irrigation schemes shall be treated as eligible for free power.</p>	

	Income tax assessee	
20	<p>Under the existing electricity tariff policy while most of the farmers are exempt from paying electricity charges farmers coming under corporate farmers and income tax assesses need to pay electricity charges as decided by the Electricity Regulatory Commission. While there is no doubt or dispute in collecting electricity charges from corporate farmers the issue related to income tax assesseees needs re-examination.</p>	
21	<p>There is no clear meaning or interpretation of which of the farmers are to be considered as income tax assesses. Out of nearly 20 lakh pump set farmers in Telangana only about 4,000 farmers are categorized as corporate farmers and income tax assesseees. While this number of farmers appears small the number of farmers who are bothered by this category are too many.</p>	
22	<p>As there is no clarity on meaning of this slab many times farmers are served notices under this category or threatened that they would come under this category. As a result farmers were made run around many offices particularly MRO and electricity department.</p> <p>Farmers have to submit certificates from MRO saying that they do not fall under this income category. While on the one hand it is adding to the harassment that gullible farmers are made to suffer from different corners on the other it is mounting additional burden on the Mandal Revenue Office (MRO) which are already tasked with many duties. In the end it is also not adding any additional income to the DISCOMs.</p>	
23	<p>While this measure is not contributing any additional income to the utilities it is leading to harassment of ordinary farmers. In this background we request deletion of the slab related to income tax assesseees under agriculture category.</p>	
24	<p>Bill Clarity</p> <p>The Electricity Bills being issued by the DISCOMs are not clear and it is difficult to make out details of the Bill. We request the Commission to direct the DISCOMs to issue clear bills and the Bills shall be in local language along with English.</p>	<p>The electricity bills are being issued as per the regulation issued by the Hon'ble Commission. However, the licensee will follow the directions of the Hon'ble Commission.</p>

	DSM Measures	
25	<p>To be eligible for free power, farmers have to undertake demand side management (DSM) measures i.e., installation of capacitors, ISI marked pump sets, HDPE or RPVC piping and frictionless foot-valve. These measures are proposed to bring down quantum electricity consumption in the agriculture sector there by reducing financial burden both on the state government and farmers. Farmers also would like to contribute to this endeavour. Though farmers are interested in taking them up they are facing hurdles in implementing them.</p>	<p>A drive has been conducted in TSNPDCL for installation of Capacitors to Agl pump sets. Further, while releasing of services it is ensured that the farmers follow DSM measures then only they are made eligible for free category.</p> <p>However 282 capacitors of 2 MVAR were already in use in the existing substations.</p> <p>169 capacitors of 2/1 MVAR work is under progress.</p>
27	<p>DISCOM officials are claiming that more than 90% of the farmers have installed capacitors. But truth is that not even 10% of the farmers installed capacitors. Farmers do not have technical assistance in the form of access to linemen or assistant linemen, to take this up. Thousands of line men posts in rural areas are lying vacant. Even where linemen or assistant linemen are available they do not have proper knowledge in installation of capacitors. Installation of capacitors at a wrong point led to burning of pump sets, which scared other farmers from doing the same.</p>	
28	<p>A pilot implemented by SPDCL (p.88) power consumption declined by nearly 10% after installation of capacitors. This implies that by spending Rs. 60 crore to install capacitors at 20 lakh pump sets in Telangana DISCOMs will be able to save about Rs. 500 crore. This alone shall spur the DISCOMs to implement capacitor programme on war footing.</p>	

<p>29</p>	<p>Use of ISI standard pump set is another important DSM measure. Present pump set efficiency in the State is only 25% and this could be increased to 50% by using ISI standard motors. For proper operation of ISI standard pump sets minimum voltages are required.</p> <p>Under prevailing low voltages in the state these ISI motors do not work. Because of this low voltage, farmers are forced to go in for locally made pump sets which operate even under low voltages. One of the reasons for low voltage is overloading of distribution transformers (DTR) installed for agricultural purposes. This overload is to the extent of 25 to 50%. If this overload problem is addressed successfully farmers can think of using ISI standard motors. This can be addressed by increasing the number of DTRs of adequate capacity in the agriculture sector. We request the state government and DISCOMs to install additional DTRs to solve low voltage problem so that farmers will be emboldened to go in for ISI standard motors.</p>	<p>Improvement of DTRs and Erection of new 33/11 KV and 132/33 KV substations are proposed for improvement of voltages at tail end consumer. Wherever the authorized overloading is noticed, the additional DTR of adequate capacity in the agriculture sector at load centre is installed.</p>
<p>7.5</p>	<p>Though the farmers may be willing to install ISI standard motors in the event of voltages improving the financial burden on them will be onerous and it will be good to explore the ways of minimizing burden on them in replacing the non-standard motors with ISI standards motors. In Tamil Nadu, the State government and utilities are said to have taken up a programme where a third party – Electricity Service Company (ESC) – takes the responsibility of replacing the motors and is given a share in the savings of electricity consequent to installation of standard motors. We request the State government to explore this option also as it will not burden the state government as well as the farmers.</p>	<p>It is not in the purview of the Licensee as it is policy matter.</p>

	HVDS:	
8.1	<p>Since 2005 HVDS programme is taken up in the state as a solution to the low voltage problem. Until now thousands of crores of rupees were spent on this but not even 10% of the pump sets were covered. A HVDS transformer is five times costlier than the regular DTRs being used at present. It was felt that if the same amount was spent on adding regular DTRs by this time the low voltage problem would have been solved. Even if the present additional load on existing DTRs is assumed as 50% then the estimated expenditure would be 50% of the cost of the existing DTRs. If we want to replace all the DTRs with HVDS DTRs the expenditure would be five times. The question is why spend 550% more when we could achieve with 50% only. We may be wrong in these calculations. Farming community in the state does not have any information on or insight in to this HVDS programme. Farming community in the state should have been taken in to confidence while formulating solution to low voltage in rural areas. This is not too late. We request the state government as well as the DISCOMs to place all the information related to HVDS before the public including farmers for an informed discussion on the problems being faced by both the DISCOMs and farmers in the state that will lead to a solution that is beneficial to all stakeholders.</p>	<p>2,49,845 Agl services are converted into HVDS since 2005 out of 1007669 Agl services existing in TSNPDCL as on 28.02.2015. This shows that 24.7% Agl services are converted into HVDS till now.</p> <p>Further 1,24,335 Agl services are covered under JICA which are programmed upto FY 2016-17. This shows that 37% of the pumpsets are covered. Balance pumpsets will be taken up in phased manner.</p>
8.2	<p>Over the last few years hundreds of crores were spent on implementing HVDS for agriculture pump-sets. The present filings also show that DISCOMs plan to spend more money on this. Before taking this programme forward there should have been a thorough review of its implementation until now. But there appears to be no such exercise. Given the serious implications of this investment (Consumers have to bear this burden in the form of higher cost of service) we place below our analysis of the investment under HVDS.</p>	<p>Envisaged benefits are achieved on HVDS implemented 11 KV feeders. The transformers failures are decreased and theft of energy is arrested. The voltage are increased at consumer side, Reliable and quality power being supplied to all the consumers and they were satisfied with HVDS. Further 11 KV line losses are decreased.</p> <p>The benefits accrued after implementation of HVDS are computed and enclosed as annexure (A).</p>

8.3	<p>For the following analysis we have compared LT – DTR and HVDS. We have taken the transformer capacity as 63 kVA. Hours of supply in a day is assumed as 7 hours and number of days as 240 days. Cost of power is assumed as Rs. 3.00 per unit. We examined this under three power factor capacities – 0.6, 0.7 and 0.8 The results of our analysis are presented in the following table. In this table reduction in line losses are taken as returns on investing on HVDS.</p> <table border="1" data-bbox="283 467 1165 750"> <thead> <tr> <th>Power Factor</th> <th>Cost of HVDS (Rs.)</th> <th>Cost of Lt – DTR (Rs.)</th> <th>Additional Cost (Rs.)</th> <th>Returns per year from HVDS (Rs.)</th> <th>Payback period (Years)</th> </tr> </thead> <tbody> <tr> <td>0.6</td> <td>6,29,628</td> <td>1,15,000</td> <td>5,14,628</td> <td>18,949</td> <td>27.16</td> </tr> <tr> <td>0.7</td> <td>6,29,628</td> <td>1,15,000</td> <td>5,14,628</td> <td>13,923</td> <td>36.96</td> </tr> <tr> <td>0.8</td> <td>6,29,628</td> <td>1,15,000</td> <td>5,14,628</td> <td>10,660</td> <td>48.28</td> </tr> </tbody> </table>	Power Factor	Cost of HVDS (Rs.)	Cost of Lt – DTR (Rs.)	Additional Cost (Rs.)	Returns per year from HVDS (Rs.)	Payback period (Years)	0.6	6,29,628	1,15,000	5,14,628	18,949	27.16	0.7	6,29,628	1,15,000	5,14,628	13,923	36.96	0.8	6,29,628	1,15,000	5,14,628	10,660	48.28	<p>The HVDS works were taken up after analyzing the losses as a major factor. The distribution losses reduced is to be considered as saving in the natural resources like coal, gas, etc., used for power generation. In addition to the above DTRs are shifted to the load centers in HVDS duly improving the voltage profile in the LT system.</p>
Power Factor	Cost of HVDS (Rs.)	Cost of Lt – DTR (Rs.)	Additional Cost (Rs.)	Returns per year from HVDS (Rs.)	Payback period (Years)																					
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8.4	<p>In Andhra Pradesh a power factors of 0.70/0.80 reflect the prevailing situation. Under these conditions it takes 37 to 48 years to recover the investment made in to the HVDS system, let alone profits over it. In other words the payback period for these investments is about 37 to 48 years. The guaranteed life of these transformers is about 3 years and its life may extend up to 10 years, but its' payback period is several times more. Thus, financially speaking the HVDS does not appear to be attractive. Still the DISCOMs in the state are rushing in to implement it on large scale. And farmers are being coerced in to accepting it.</p> <p>One of the important reasons shown in promoting the HVDS system was elimination of unauthorised agriculture connections and theft. Experience in other states like Rajasthan and Uttar Pradesh shows that HVDS is not a deterrent to these practices and even under HVDS system theft continues to take place. We hear that Noida Power Company Limited (NDPL) in UP which went in to HVDS on a large scale is now thinking about winding it up.</p>	<p>Farmers are very much in support of HVDS system and farmers are requesting for HVDS system to their pump sets as there is good voltage profile and better discharge of water.</p> <p>Year wise pump sets covered and expenditure incurred un HVDS system are placed below.</p> <table border="1" data-bbox="1201 1166 1738 1416"> <thead> <tr> <th>Year</th> <th>No.of Pump Sets</th> <th>Amount in Rs. Crs</th> </tr> </thead> <tbody> <tr> <td>2005-06</td> <td>44729</td> <td>83.13</td> </tr> <tr> <td>2006-07</td> <td>5232</td> <td>6.52</td> </tr> <tr> <td>2007-08</td> <td>14437</td> <td>35.44</td> </tr> <tr> <td>2008-09</td> <td>13672</td> <td>50.63</td> </tr> <tr> <td>2009-10</td> <td>77648</td> <td>68.35</td> </tr> </tbody> </table>	Year	No.of Pump Sets	Amount in Rs. Crs	2005-06	44729	83.13	2006-07	5232	6.52	2007-08	14437	35.44	2008-09	13672	50.63	2009-10	77648	68.35						
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	Though the returns from this HVDS scheme are doubtful it will surely end up as a huge burden on the consumers in the form of Cost of Service (COS) as these transformers are four times more costly than the present transformers.	2010-11	20460	78.59	
		2011-12	26332	80.06	
		2012-13	13771	52.8	
		2013-14	7621	25.27	
		2014-15	25943	80.28	
		Total	249845	561.07	
8.5	Based on these facts we request the Commission to review the past implementation of the HVDS in the state and also to put the presently proposed scheme with the support of JIBC to strictest test. We also request the Commission to direct the DISCOMs to provide us information on amount spent on HVDS and number of pump sets converted to HVDS each year since the programme was taken up.				
9.1	Solar based power for agriculture: Government of India and Telangana have taken steps to pilot solar based agriculture pumps. While this is welcome, it will be good to pilot a few projects where the agriculture feeder is powered by solar. With falling prices of solar, this option may be economically viable and with MNRE subsidy and soft loans become very attractive.	This issue is not under purview of the Licensee as it is policy as to be decided by the State Government.			
10.1	A dedicated power plant for Twin Cities Farmers of Nalgonda and Medak are suffering a lot as often power meant for them is diverted to meet the needs of Twin Cities of Hyderabad and Secunderabad. An alternative could be to set up a power plant dedicated to the needs of Twin Cities. Already land was acquired at Sankarpally to set up a power plant. Telangana State Government shall take all steps needed to set up a gas based power plant at Sankarpally at the earliest.	This issue is not under purview of the Licensee			
11.1	Transmission lines in agricultural fields: No Policy and No compensation Farmers are not being paid for the land taken to lay power lines as the DISCOMs are applying out dated Telegraph Act. Land acquisition Act 2013 has to be applied in this case.	This issue is not under purview of the Licensee			

	<p>While some movement in this direction has taken place in SPDCL it has to be seen that this applies to whole of Telangana and the Commission shall direct DISCOMs to formulate rules and procedures in this regard.</p>	
11.2	<p>Farmers are concerned that electricity transmission lines and towers are being laid in their agricultural lands, without any prior information or consent. After thorough deliberations, Telangana Kisan-Kheth Mazdoor Congress has proposed a policy, which should serve as an instrument for compensating the farmers, who are affected by the transmission line mentioned above, and all such activities in future and past.</p>	
11.3	<p>Usually, farmers do not receive any prior information, nor anyone would ask their consent, before entering their fields. Farmers feel laying a transmission line and possibly towers in their lands, would deprive of them of their livelihood, loss of crop and possible health problems. Often, access to their land is restricted. The loss of economic value for their land would also undermine their financial capacity in various ways. Small and marginal farmers with less than 5 acres would be more severely affected.</p>	

11.4 In Rangareddy district, a Committee was constituted by the District Collector to formulate a compensation package. Eventually, on 8th August, 2014, this Committee had worked out a compensation package for the farmers, as follows:

A) FOR TOWER LOCATION AREA:

Sl. No.	Type of land	Category-I. Area of damage upto 350 Sq.Yds. (A, B & C Type tower)	Category-II. Area of damage above 350 Sq.Yds. (D Type tower)
1	<p>a) Land facing to High ways, (up to 0.5 KM distance).</p> <p>b) Nearer to the Housing layouts / Indl., Areas / Commercially developed Areas.</p> <p>c) Lands through which more than one transmission line is passing. Rate@Rs.1000/- per Sq.Yds</p>	3.50 Lakhs per tower	4.5 Lakhs per tower
2	<p>Interior lands. (All other lands). Rate @Rs.700 per Sq.Yds.,</p>	2.45 Lakhs per Tower	3.15 Lakhs per tower

	B) FOR LINE CORRIDOR AREA:	
11.5	The farmers' lands even underneath the transmission line conductors between tower to tower, are affected, where he can't further construct any structures and even they can't grow any tall trees.	This issue is not under purview of the Licensee
11.6	Hence to cover all the damages to the land owner under the line corridor for a width of 20 meters (10 meters on either side from the centre of the line) for the existing span between tower to tower shall be assessed at Rs.60 per Sq. Meter and paid to the respective land owners as per the extent of land affected.	
11.7	If any fruit bearing tree other than crops are required to be cut under the transmission line, conductors, the compensation shall be paid extra based on the assessment by the Horticulture department."	
11.8	While the compensation worked out by the District Committee (mentioned above) is lower than prevailing land market conditions, and much lesser than the farmers expectations, the compensation package worked out by this Committee set up by Rangareddy District Collector can be a beginning. However, the parameters, procedures and quantum of compensation have to be formulated and incorporated in a relevant policy. It would also prevent individual-centric responses by local officials.	
11.9	We would request you to take the following steps: Enable the adoption of Telangana Resettlement, Relief, Rehabilitation and Compensation Policy. Such a policy can establish a framework, whose implementation can be reviewed and improved as appropriate. 2. Provide for adequate compensation to affected farmers, and initiate steps to rehabilitate the affected families in case of complete dispossession, especially in Yacharam, Kandukur, Manchala and other mandals.	

<p>3. Formulate a plan for paying compensation to the farmers, after their consent, for all kinds of loss, including opportunity costs.</p> <p>4. Farmers, who are in possession of assigned pattas and other land entitlements should also be given compensation on par. Their rights have been established by various Court Judgements and government orders.</p> <p>5. Provide specific instructions on compensation package to relevant officials, not leaving them to any individual interpretations, such as HMDA limits. Rangareddy District Committee has worked out the package in general, and is not limited to HMDA or any such geographical areas.</p> <p>6. Enable release of information on the entire project in the public domain, including line alignment, location of towers, possible electro-magnetic impact on human beings and animals, in the vicinity, and the compensation schemes</p>	
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Annexure - A

HVDS ANALYSIS (Loss Reduction)

Description	Ghanpur M Feeder, Machareddy Section		Medaram Feeder, Dharmaram Section		Alur I & II Feeders, Dehagaon Section		TOTAL	
	Pre HVDS	Post HVDS	Pre HVDS	Post HVDS	Pre HVDS	Post HVDS	Pre HVDS	Post HVDS
Initial Raeding	11813.5 (15-01-2012)	16675.6 (15-01-2013)	9253.79 (14-12-2008)	1967.11 (14-12-2011)	175336 (01-12-2008)	3044.95 (01-12-2012)		
Final Reading	12544.1 (15-03-2012)	17539.1 (15-03-2013)	9896.2 (15-06-2009)	2542.17 (15-06-2012)	176926 (01-03-2009)	3269.33 (01-03-2013)		
Difference	730.6	863.5	642.41	575.06	1590	224.38		
Multiplication factor	1000	1000	4000	4000	400	4000		
Consumption	730600	863500	2569640	2300240	636000	897520		
Consumption per month	365300	431750	428273	383373	212000	299173	1005573	1114297
No of Services	347	444	861	885	683	992	1891	2321
Unauthorised services regularised	97		24		309		430	
Consumption per month per AGL Service	1052.74	972.41	497.41	433.19	310.40	301.59	531.77	480.09
Difference of consumption of pre to post HVDS	80.33		64.22		8.81		51.67	
Loss reduction after HVDS Conversion(A)	35666		56838		8739		119937	
% Loss Reduction	8.26		13.27		4.12		11.93	

Replies to the Objections / Suggestions raised on ARR & FPT for FY 2015-16 of Telangana State Ferro Alloys Producers Association, Hyderabad

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

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

	<p>It is pertinent to mention that the agriculture consumption over and above the approved quantum should be entirely met with the Government subsidy only and this should not be burdened further on the already subsidizing class of consumers. This acquires greater significance in the light of expensive power being purchased by Discoms to meet the increased demand of agriculture.</p>	<p>Hon'ble Commission is approving agriculture sales quantum based on previous years approved agriculture sales. In fact the commission has approved same sales of FY 2012-13 for FY 2013-14 also without considering releasing of new agriculture connections.</p> <p>TSDISCOMS have projected the Agl sales based on the actual sales data available and also release of pending Agl connections. Actual Agl sales would depend on the existing pump sets, additional pump sets being energized, crop pattern, rainfall during the year etc. and it is not possible for TSDISCOMS to ensure the actual Agl sales stay below approved Agl sales.</p>
	<p>The high cost power purchase necessitated by excess requirement of agriculture demands, should be met with the Government funds and this should not be allowed as a pass through.</p>	<p>TSDISCOMS are filing for true up for FY 13-14 and FY 14-15 based on actual sales, pp data etc. TSDISCOMS pray to the Hon'ble Commission to accept the true up amount</p>
	<p>The Discoms are submitting unrealistic and inflated power requirement in the industry consumptions requiring purchase of high cost power. Such unrealistic projections would only result in higher power purchase cost and increase in tariffs for the consumers. We request the Hon'ble Commission not to allow such inflated estimates.</p>	<p>The sales to industrial category in previous years (FY 2014-15 and 13-14) has been constrained due to restriction and control measures. For FY 2015-16 sales has been arrived after adjusting for restriction and control (R&C) measures which were earlier in place.</p> <p>Sales for other categories were done on realistic basis considering historical trend and future plans. The overall sales of TSNPDCL for FY 2015-16 is projected to grow at 10% over the FY 2014-15.</p>
	<p>The imported coal prices are steadily falling down. Adjustment in the coal mix should proportionately be reduced from the power purchase cost.</p>	<p>Suggestion is noted.</p>
	<p>True-up for 2013-14 and 2014-15:</p> <p>The Discoms have stated that while there is a decrease in metered sales, and an increase in unmetered sales beyond tariff order quantities resulting in tariff distortion. Hence the Hon'ble</p>	<p>The gains/losses of up to FY 2012-13 are claimed under FRP (Financial Restructuring Plan) along with the true-up of Retail supply Business for FY 2013-14.</p> <p>Further the licensee has claimed the true up of</p>

	<p>Commission may direct the Government to reimburse the cost of sales to agriculture in excess of tariff order quantity and to ensure the subsidizing category of consumers are reimbursed to maintain the level of cross subsidy as per the ratio of tariff order in view of the decrease in metered sales.</p>	<p>distribution Business for FY 2013-14 in the Distribution Business filings submitted to the Hon Commission for 3rd control period on 04.03.2015.</p>
	<p>As per the Regulation No:4 of 2005 the True-up is to be taken for the whole control period. However, the Discoms have submitted petition for true up for retail sales for 2013-14 alone. This is in contravention of the Regulations which the Hon'ble Commission should not have allowed. The gains that could have been accrued on account of excess agricultural sales over and above the approved quantities by the Commission of previous years of the control period should have been passed on to the consumers. We request the Hon'ble Commission to look into this aspect and do justice to the consumers who are over burdened with inflated FSA claims.</p>	<p>As highlighted by the objector, the licensee has been facing adverse sales mix wherein sales from higher tariff categories has gone down compared to sales in lower tariff categories. This has resulted in licensee realizing lower revenue than which was approved in the tariff order.</p> <p>Regulation no 4 of 2005 doesn't allow the licensee to recover revenue due to adverse sales mix variation. The licensee prays that the Hon'ble Commisison considers the revenue loss to the discom due to the sales mix variation.</p> <p>As mentioned in the retail-supply write-ups, accumulated losses incurred by the discom as on 31st March 2013, has been considered under FRP scheme. Hence the the discoms have submitted the true-up petition for FY 2013-14 which was not covered under the accumulated losses till 31st March 2013.</p> <p>FSA is a mechanism which allowed the discoms to recover the power purchase cost which is in excess of the approved level due to variation in cost as well as quantity purchased. Hence the discoms do not accrue any gain through FSA rather it is a cost recovery mechanism.</p>

TARIFF PROPOSALS OF TSNPDCL FOR THE YEAR 2015-16

For the ensuing year 2015-16, the DISCOM has proposed a tariff of Rs 4.84/Unit for consumers availing supply at 132 kV & Rs 5.27/Unit for consumers availing supply at 33 kV level. There is an increase of Rs 0.26/Unit at 132 kV level and Rs 0.29/Unit at 33 kV level.

The variation in tariff at different voltages of Ferro Alloy Producers is almost similar to variation in tariffs at different voltages for other industrial category consumers. Further the ToD is not being levied on Ferro Alloys consumers as other similar industrial consumers are levied with ToD and demand charges.

Voltage wise Tariffs for the current financial year and ensuing financial year, applicable to Ferro Alloy Industry category in the state of Telangana, as submitted by TS DISCOMs to the Hon'ble TSERC are shown in the following Table.

The hike in tariff is due to unavoidable increase in cost of service which is again due to increase in power purchase cost and the cost of network.

Voltage Level (kV)	Existing Tariff (FY 2014-15) Rs/KWH	Voltage Wise Difference	Proposed Tariff (FY 2015-16) Rs/KWH	Voltage Wise Difference
11	5.41	0.43	5.72	0.45
33	4.98	0.40	5.27	0.43
132 kV & above	4.58	N/A	4.84	N/A

The difference between tariffs of other consumers at 33 kV and 132 kV may not be equal to the difference in losses between the said two voltage levels as the tariff at a particular voltage level not only depends on the losses at that level, but also on cost of network and its maintenance.

It can be observed from the above Table that, the difference between the tariff applicable to EHT Consumers (132 kV and above) and 33 kV consumers for the ensuing year is Rs 0.43/Unit. This wide disparity amounting to about 9% is not explained anywhere in the Tariff proposals of the DISCOMs. The difference is extremely wide and is inexplicably set without any reasons, to the disadvantage of the Industry.

TSDISCOMS have strived to pass on the cost savings to consumers who are connected at a higher voltage level like 33 kV and 132 kV in the form of a lower tariff. The difference in tariff is only 9% which is as explained above the passing on the benefit of lower losses to higher voltage consumers

Entrepreneurs intending to set up low capacity Ferro Alloy Units in medium sector i.e up to 5 MVA of Contracted Capacity (10 MVA in case of dedicated feeders) are burdened with high tariffs applicable at 33 kV, and are discouraged to enter into business. The existing consumers are feeling the burden in terms of increased production costs and to compete with large scale producers with 132kv voltage.

<p>Certainly, there should be a slight differentiation between Voltage wise tariffs, owing to the fact that the Consumers drawing power at Higher Voltages cause less losses to the system and use less proportion of the Distribution Network. The voltage wise tariffs should reflect technically and commercially the usage of the network, but should not be so onerous to deplete the consumers existing at 33 kV level.</p>	
<p>The average Cost to Serve (CoS) as approved by the Commission for FY 2013-14 is Rs 5.46/KWH. There is no tariff change for FY 2014-15. The state level CoS for FY 2015-16 as estimated by the Licensees is Rs 5.98/KWH.</p>	
<p>The Network Cost as approved by the Commission for FY 2013-14 is Rs 0.83/KWH and this has been increased to Rs 1.0/KWH primarily due to increase in wages of employees, increased Capital Investment of the licensee.</p>	
<p>The power procurement cost based on escalation in the variable costs over and above the actual variable cost is not in line with the Regulations. Generation cost from central stations is governed by CERC Tariff Regulations and should be considered accordingly. Variable costs may not be considered on the presumptive basis of the licensees and may be based on actual. Any variation in fuel price is adjusted through annual True-up mechanism.</p>	<p>TSDISCOMS have considered Fixed Cost as furnished by the Generating stations which are derived based on the CERC Terms & Conditions of Tariff Regulations. Tariff regulations allow for a pass through of variable cost and this has been considered accordingly by TSDISSOMS while projecting the variable cost</p>
<p>It is a proven fact that, the Ferro Alloy Industry operates at a very higher Load factor, of above 90%. In certain cases, the load factor reaches to even 95% to 98%. The industry is very power intensive in nature and operates at a flat load pattern, which is very much desired by the Grid Operators. The flat load pattern of this industry, gives lot of certainty to the DISCOM to procure power on long term basis at a cheaper cost. That is the reason why, Electricity Act mandates that Consumer's load factor should be given due consideration while fixing the tariffs. Relevant provision of the Electricity Act-2003 is presented below:</p>	<p>Tariffs of the Ferro Alloys Industry at different voltage levels are within $\pm 20\%$ of the average cost of supply as per the Tariff Policy. Infact at all voltage levels, the proposed tariff is below 20%.</p> <p>Considering the high load factor of Ferro Alloy industries, TSDISCOMS have not proposed any demand charges for this consumer category and has only proposed a very nominal increase in energy charges by 5.75% only.</p> <p>However, it is to inform that the energy charges tariffs also for Ferro Alloys Industrials are less as compared to other normal HT-I (A) Industrial consumers.</p>

<p>The embedded cost of service, pertaining to HT Industrial category for 33 kV, as estimated by the DISCOM for FY 2015-16 is Rs 5.22/kWH. The same for EHT (132 kv and above) Industrial category is Rs 4.99/KWH. The difference between embedded CoS between 132 kV & 33 kV is Rs 0.23/KWH.</p>																			
<p>As per the methodology of embedded CoS, the category wise / voltage wise Cost of Supply is estimated duly taking all costs and voltage wise losses duly attributing to different categories on certain technical / commercial parameters. For determining Retail Tariffs embedded CoS is the basis.</p> <p>Even if we compare with the difference in embedded CoS as worked out by the DISCOM, the tariff difference between 132 kV & 33 kV Ferro Alloy units should be Rs 0.23/KWH and certainly not Rs. 0.43/KWH as field by the DISCOM.</p>																			
<p>The Hon'ble Commission is kindly requested to look into the matter and determine the tariff on similar lines with embedded CoS, and keep the difference between 132 kv & 33 kV Ferro Alloy tariff accordingly.</p>																			
<p><u>DISCOM's failure to contain the Distribution Losses:</u></p> <p>11. Actual performance of the DISCOM with respect to distribution losses reduction for the past two years and the expected losses for the ensuing year are as following:</p>	<p>The Licensee is putting most efforts in reducing losses. Regular network strengthening works for reduction of technical losses with various schemes are being taken up and necessary steps are being taken up for reducing commercial losses by conducting regular DPE inspections. TSNPDCL has under taken various loss reduction measures distribution losses have brought down from 26.81% in 2000-01 to 13.32% in 2013-14 (Including EHT Sales).</p>																		
<p><u>DISCOM's failure to contain the Distribution Losses:</u></p> <p>Actual performance of the DISCOM with respect to distribution losses reduction for the past two years and the expected losses for the ensuing year are as following:</p> <table border="1" data-bbox="241 1291 1150 1430"> <thead> <tr> <th colspan="2">FY 2013-14</th> <th colspan="2">FY 2014-15</th> <th colspan="2">FY 2015-16</th> </tr> <tr> <th>APERC Target</th> <th>Actual Losses</th> <th>APERC Target</th> <th>Estimated Losses</th> <th>APERC Target</th> <th>Expected Losses</th> </tr> </thead> <tbody> <tr> <td>11.8%</td> <td>13.32%</td> <td>11.8%</td> <td>11.97%</td> <td></td> <td>11.88%</td> </tr> </tbody> </table>	FY 2013-14		FY 2014-15		FY 2015-16		APERC Target	Actual Losses	APERC Target	Estimated Losses	APERC Target	Expected Losses	11.8%	13.32%	11.8%	11.97%		11.88%	<p>However, the Distribution Licensee has adopted voltage wise distribution loss levels for FY 2015-16 as approved in the Distribution Tariff Order for 3rd Control period by the erstwhile APERC.</p>
FY 2013-14		FY 2014-15		FY 2015-16															
APERC Target	Actual Losses	APERC Target	Estimated Losses	APERC Target	Expected Losses														
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	<p>As per the filings of TS NPDCL, actual distribution losses for FY 2013-14 is 13.32% as against the APERC target of 11.88%. TS NPDCL missed the loss reduction target by 1.44%. As per the estimate and figures submitted by the DISCOM 1% loss corresponds to about Rs 72 Crs. If the DISCOM is able to contain the losses within the target specified by the Hon'ble APERC, there is no requirement of Tariff hike.</p>																	
	<p>Time Period of Load Restrictions/Power Cuts & Outages to be relaxed for calculation of Deemed consumption</p>																	
	<p>Sometimes, DISCOMs are announcing unscheduled power restrictions / Power cuts and are causing lot of inconvenience to the Ferro Alloy industry. Utilities are not sure of supplying 24X7 power to the Industrial sector particularly Ferro Alloy units. Even the Distribution network of the utilities is prone to lot of forced outages and is taking more time to restore the system. At least about 10% - 12% of the time, power supply is not made available on an annual basis due to forced outages and breakdowns in the system. Added to this, the DISCOMs are implementing Restriction & Control (R&C) measures, during certain periods of the year, during the peak load time (6:00 P:M to 10: 00 P:M) and other times of the day.</p>	<p>While calculating the deemed consumption, the licensee is deducting the R&C periods (if any).</p> <p>However, it is to inform that the intention of the deemed energy charges /minimum energy charges are to be levied to recover the fixed charges to be incurred by the licensee which are incurred irrespective of energy drawn from the generators and actual energy supplied to consumers.</p>																
14	<p>It is expected that, even for the ensuing year of FY 2015-16, the TS DISCOMs are not quite sure of providing quality and uninterrupted power to the Industrial Sector. About 20% of the time required quantum of power supply may not be available to the industry in view of shortage of generating capacity from the committed sources / Short term sources. It is estimated that, as a whole about 30% of the time, required power is not made available to the Ferro Alloy industry in an year. This is causing lot of operational / financial</p>																	

	burden to this sector. Hence it is earnestly requested that, till such time the DISCOMs assure 24X7 power supply to the Ferro Alloy units throughout the year, the deemed consumption charges shall not be levied and the billing can be insisted on the actual energy consumption.	
	True Up-Requirements	
	Vide the ARR filings, TS DISCOMs have requested Hon'ble Commission to recover the loss amount restructured as short term loan over and above Rs2450 Crs, as when restructuring is done by the TS DISCOMs in tune with the objectives of the State Government. They requested the Commission to allow the licensees to recover the principle amount due from FY 2017-18 onwards. TSNPDCL has estimated a true up requirement for FY 2013-14 as Rs (39.37) Crs after duly accounting for variations in Costs and Revenues. For FY 2014-15 TSNPDCL estimated a revenue gap of Rs 262 Crs that need to be trued up on provisional basis.	As per the amended Regulation No. 4 of 2005 issued by the erstwhile APERC and adopted by TSERC, True up for Retail Supply Business shall be filed along with ARR of the licensee only to avoid quarterly filing of FSA and approval.
	It is humbly pointed out that the State Government has to take up the entire responsibility of financial restructuring of the DISCOMs, and the burden should not be levied on to the consumers. Principal repayment has also to be borne by the State Government.	The true up for Distribution Business and Retails Supply Business of the TSNPDCL for the 1 st control period (FY 2006-07 to FY 2008-09) and 2 nd control period (FY 2009-10 to 2013-14) were not claimed. As per the Regulation 4 of 2005, the licensee has eligible to claim after completion of control period. The claim for Tue up of NPDCL for the 1 st control period was submitted to Hon'ble Commission and order was not issued. The 2 nd control period was completed with FY 2013-14 only. In view of the above, accumulated losses as on 31 st March 2012 recognized under FRP duly excluding the bonds issued to be taken over by the Government is proposed as true up which is 41% of total FRP.
	If the True Up burden is loaded on to the approved ARR of the DISCOMs by the Commission, it unnecessarily burdens the end consumers.	
	The present Economic scenario	
	The present economic situation Globally and domestically is not encouraging the manufacturing sector. Countries like China and Russia are dumping steel in huge quantities into Indian markets throwing the Indian production out of gear. Major steel plants are cutting their production levels and offering price cuts, which is affecting badly the Ferro Alloys industry. Today in the Telangana State, the Ferro Alloys units are bleeding cash losses and are	The Discoms, Transco and Genco are alive to the challenges highlighted by the objector and following are some of the key steps been taken to address the concerns TS Genco Following capacity additions (thermal) are been planned

unable even to meet their current CC charges bills of Discoms. The producers are not even able to sell a Kg. of metal even with heavy discounts and longer credit periods.

On the other hand, the World Bank in its Indian Power Sector Review Report in respect of both the States of A.P. and Telangana, published recently, reiterated among other things, the following:

Quote:

The Distribution segment of A.P.power sector, which is the first hand revenue earning system has begun to lose money since 2012-13, the report which studied the 20 year period since economical liberalisation, noted. It attributed the losses to rising cost of power purchase and a decline in the subsidy received vis-à-vis the subsidy booked. Cost of power purchase rose sharply for distribution companies from Rs.2.81 per unit in 2009-1 to Rs.3.39 per unit in 2011-12 and to Rs.4.25 per unit in 2012-13. The volume of power purchase from short term sources rose by 14 percent in three years from 866 Mus in 2009-10 to 10,094 Mus in 2012-13. Taking cognizance of the State's constraints in purchasing cheaper power from other regions owing to inadequate inter-regional connectivity. The World Bank Report also pointed out the low Plant Load Factor (PLF) of the existing thermal plants and the delays in commissioning of new plants for lack of fuel as the limitations. On the other hand, subsidy received as share of subsidy booked began to decline from 2008-09 onwards and stood at only 50% in 2011-12, resulting in cash flow problems for the Discoms. The report recommended capacity addition in generation, grid strengthening and enhancing ability to absorb power flows, especially from renewable and reinforcing of distribution network, household metering and segregation of feeders among others.....**

Unquote: (the erstwhile State of A.P consisting both A.P and Telangana)**

- KTPP Stage II – 600 MW
- KTPS Stage VII – 800 MW
- Manuguru – 1080 MW
- Damarcherla A – 1200 MW
- Damarcherla B – 3200 MW
- KTPS Stage VII – 800 MW
-

In addition 250 MW from Hydel sources are planned. Issue of low PLFs due to coal shortage is been taken up with Coal India at all forums for resolution.

Corridor constraint issue is been addressed through the execution of new inter-state transmission lines

Wardha- Nizamabad- Hyderabad (765 KV D/C line)
Warora – Warangal – Hyderabad (765 KV D/C line)

In addition system strengthening and new schemes are been executed by TS Transco to ensure adequate grid reliability and availability.

To improve the operational performance, the discoms are conducting energy audit drives as well as meter replacement drives (replacement of mechanical meters with IR port meters and smart meters/ AMR for industrial loads) improving HVDS penetration as well as feeder segregation works. These are expected to improve the financial performance of the discom as well.

Replies to the Objections / Suggestions raised on ARR & FPT for FY 2015-16 of Sri Thimmareddy, Convenor, People's Monitoring Group on Electricity Regulation, # 139, Kakatiya Nagar, Hyderabad – 500008

Sl. No	Summary of Objections / Suggestions	Response of the Licensee
1	<p>2.1 According to Section 64 (3) of the Electricity Act, 2003 licensees have to file application for determination for tariff one hundred and twenty days before the said tariffs come in to force. If the new tariff is to come in to force by 1st April 2015 application for new tariff should have reached the Commission by last week of November, 2014. TSDISCOMs are reported to have submitted ARR and Tariff on 7th February, 2015, involving high drama. According to newspaper reports even utility officials were not aware of this submission. Until the Public Notice was issued in the Newspapers on 11th February there were doubts about this submission. One of the reasons adduced to this delay was the mistakes that have crept in to this filing. But a cursory scan of the filings shows that there are still many errors. This also sows lack of transparency and accountability in this process.</p> <p>2.2 The whole process under way to determine electricity tariff for the financial year 2015-16 appears to be violation of due process enshrined under the E – Act.</p>	<p>The delay in filings by the licensee is mainly due to :</p> <p>Consequent to the state bifurcation on June 2nd 2014, for TSNPDCL, 7 Mandals of Khammam District have been diverted and reassigned to APEPDCL. As the MYT tariff order issued by the Commission includes ARR of 7 Mandals of Khammam circle for TSNPDCL, it is required to revise the Distribution costs for 3rd control period for FY 2014-15 to FY 2018-19. Hence the licensees has to segregate the financial statements in the event of state bifurcation as it forms the basis for revision of the Distribution costs from FY 2014-15 to FY 2018-19 and also needs time for firming up power/fuel availability and cost thereof from various sources. Due to delay in preparation and receiving this information which would have a material impact on the overall ARR for the ensuing year and the measures to be adopted by the licensee in addressing it, the licensee is forced to submit the filings with delay so as to finalize the distribution costs and power purchase cost projections accurately.</p>
2.	<p>2.3 In the rush to come out with the tariff order by 23rd March the public has been denied sufficient time to scrutinize the filings of the DISCOMs. Under the new Act at least 30 days time should have been given to the public to respond in writing. The public shall be given at least 30 days time from the day of publication of new tariff proposals. According to the Public Notice issued on 11th February last date for filing suggestions/objections is 7th March and the first public hearing on tariff proposals will take place on 12th March. It is doubtful whether</p>	<p>The purpose of filing objections is to receive the comments of the consumers broadly about the claims made by the Discoms, thereby the Hon'ble Commission would be obligated to examine the said claims in detail from the stand point of the objections that was raised by consumer/s. No part of the existing regulations mandates requirement of thirty days time.</p>

	<p>DISCOMs will be in a position to go through the suggestions/objections filed send their responses to the public as well as the Commission in such a short time. While the public hearings will be over by 14th March the Commission is expected to come out with the Tariff Order by 23rd March, after due consultation with the Government of Telangana State regarding the quantum of subsidy available, for the new tariffs to be applicable from 1st April. Under such unseemly haste it is doubtful whether the Commission will be able to do justice to the sector in general and also balance interests of all stakeholders in the sector.</p>	<p>However, the time given by the Hon'ble Commission is almost 1month which is reasonably sufficient to respond on the claims of the Discoms.</p> <p>Further any delay in issuing the tariff order will cause loss of revenue to the Discoms; the hon commission is requested to issue the order such that the new tariff will be effected from April 1st 2015.</p>												
3.	<p>2.4 Though state bifurcation may be one of the issues that have led to the delay DISCOMs cannot avoid their statutory duty to file the tariff applications in time and it is also one of the functions of the Commission to see that DISCOMs discharge their responsibilities efficiently.</p>	<p>Despite genuine efforts of the licensee there was a delay in Tariff & ARR filings due to the reasons explained above.</p>												
4.	<p>3.1.1 According to the provisions of the Andhra Pradesh Reorganisation Act, 2014 Telangana State and residuary state of Andhra Pradesh have to share power generated by power plants located in both the states. An examination of the ARR and Tariff filings of TSDISCOMs and APDISCOMS shows that there is no common understanding between the two states in sharing the power generated in both the states. In fact differences and its impact are substantial. The following table summarises these differences:</p> <table border="1" data-bbox="264 992 1184 1377"> <thead> <tr> <th data-bbox="264 992 527 1062">Issue</th> <th data-bbox="527 992 894 1062">Telangana State DISCOMs</th> <th data-bbox="894 992 1184 1062">Andhra Pradesh DISCOMs</th> </tr> </thead> <tbody> <tr> <td data-bbox="264 1062 527 1167">APGENCO thermal units – DSTPP</td> <td data-bbox="527 1062 894 1167">Claimed 53.89% power</td> <td data-bbox="894 1062 1184 1167">Claimed 100% power</td> </tr> <tr> <td data-bbox="264 1167 527 1237">TSGENCO units – KTPP II</td> <td data-bbox="527 1167 894 1237">Claimed 53.89% power</td> <td data-bbox="894 1167 1184 1237">Did not claim any power</td> </tr> <tr> <td data-bbox="264 1237 527 1377">Inter state Hydel units</td> <td data-bbox="527 1237 894 1377">Claimed 41.68% (population percentage) citing provisions of AP Reorganisation Act.</td> <td data-bbox="894 1237 1184 1377">Claimed 100% power</td> </tr> </tbody> </table>	Issue	Telangana State DISCOMs	Andhra Pradesh DISCOMs	APGENCO thermal units – DSTPP	Claimed 53.89% power	Claimed 100% power	TSGENCO units – KTPP II	Claimed 53.89% power	Did not claim any power	Inter state Hydel units	Claimed 41.68% (population percentage) citing provisions of AP Reorganisation Act.	Claimed 100% power	<ul style="list-style-type: none"> <li data-bbox="1220 691 1959 943">In accordance with the Clause C (2) of schedule XII of the AP Reorganization Act and as per G.O.Ms.No.20, DT: 08.05.2014, the allocation of power generated from the existing and the ongoing power plants located in both the states should be in the ratio of 53.89% & 46.11% respectively for Telangana and Andhra Pradesh. <li data-bbox="1220 943 1959 1382">Government of Telangana on behalf of TSDISCOMs have already submitted its views on the sharing of the power from both the Central Generating Stations and as well as the State owned Power Generating stations located in AP & Telangana states, before the Committee constituted by MoP, Govt of India, under the chairmanship of Chairperson/CEA, to resolve the issues cropped up post state bifurcation between the TSDISCOMs and APDISCOMs. Decision of the Committee is awaited.
Issue	Telangana State DISCOMs	Andhra Pradesh DISCOMs												
APGENCO thermal units – DSTPP	Claimed 53.89% power	Claimed 100% power												
TSGENCO units – KTPP II	Claimed 53.89% power	Did not claim any power												
Inter state Hydel units	Claimed 41.68% (population percentage) citing provisions of AP Reorganisation Act.	Claimed 100% power												

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

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

	<p>3.2.2 At the same time we also would like to know the steps taken by the TSDISCOMs to extend these PPAs or take over these plants on completion of PPA terms.</p> <p>3.3 Also, in the background of additional power to the extent of 450 MW being made available to both the states combined together from gas based power plants (TS share expected to be 242 MW) following change in gas allocation policy of Gol, whereby some of the gas allocated to fertiliser plants being diverted to gas based power plants in AP, and additional power being available during summer shall be taken in to account while computing total power available to the state.</p> <p>3.4 Newspaper reports indicate that TSDISCOMs are planning to generate power from the gas based power plants using LNG/Naphtha. But the same does not appear in the present filings. DISCOMs are requested to clarify on quantum of power proposed to be generated using these fuels and its implication for cost of power procurement.</p>	<p>TSPCC is making arrangement towards additional generation with RLNG (by way of swapping with KG D6 gas) and also with Naptha. TSPCC appraised the Gol about the power deficit that is being faced by the Telangana state and requested for allotment of 5 MMSCMD RLNG (under swapping arrangement with KG D6 gas) for additonla generation of 1000 MW. The Gol and Minsitry of Fertilisers accepted to swap 2.4 MMSCMD of gas with RLNG which will generate 450 MW approx.. out of which TSdiscoms share will be around 240 MW. Similarly TSDiscoms are making arrangements to fire Naptha as alternate fuel by issuing dispatch instructions to IPPs like Spectrum Power generation Ltd., Lanco kondapalli power ltd., and GVK industries ltd. (GVK stage-I) depending upon the grid constraints for an additional generation of 250 MW (for TSDiscoms only)</p>
10.	<p>Power purchase costs – fixed costs</p> <p>4.2.1 Draft PPAs of KTPS VI, KTPP I and KTPP II units of TSGENCO are pending before the Commission since 2009. Delay in disposing petitions related to these PPAs is one of the reasons for the prevailing confusion in allocation of plants between AP and Telangana. It is high time the Commission finalises them through public process.</p>	<p>Not in purview of discom</p>
11.	<p>4.2.2 Hinduja National Power Corporation Limited was selected in 1990s under fast track projects. PPA with it was entered in to by erstwhile APSEB in 1998. It was provided with sovereign guarantee. Along with this conditions were also laid that its cost shall be equal to NTPC's Simhadri unit II. As there was inordinate delay in setting up the project even after fuel linkage liquidated damages shall be collected form it as provided under the 1998 PPA. Reports indicate that changes are being made in this PPA. The same shall be examined through public hearings.</p>	<p>MoA was entered on 17-05-2013 by the erstwhile APDISCOMs with M/s HNPCL for entering amendments to the existing PPA in line with the Regulations and EA2003. As per the MoA , the Draft amendments are prepared by the both parties and discussed during the meetings with M/s HNPCL. The proposed amendments are sent to M/s HNPCL. The proposed amendments are sent to M/s HNPCL for their comments. After finalization of the draft amendments, same will be submitted to ERC for approval.</p>

12.	<p>Fixed costs of GENCO plants</p> <p>Capital Costs of GENCO New Plants, (Rs/U)</p> <table border="1" data-bbox="264 277 926 492"> <thead> <tr> <th>Station</th> <th>Capacity MW</th> <th>Fixed Cost</th> </tr> </thead> <tbody> <tr> <td>KTPS VI</td> <td>500</td> <td>1.79</td> </tr> <tr> <td>KTPP I</td> <td>500</td> <td>1.79</td> </tr> <tr> <td>KTPP II</td> <td>600</td> <td>2.25</td> </tr> <tr> <td>UMPP – Mundra</td> <td>4000</td> <td>0.98</td> </tr> </tbody> </table> <p>4.2.3 Several new thermal power plants are in operation in the state. These include KTPS – VI, KTPP – I, and KTPP – II. In the above table except the last one all other plants are set up by TSGENCO. Though they are already in operation PPAs with them are not yet cleared by the Commission. They are pending before the Commission for more than four years. Even then the Commission is allowing the DISCOMs to procure power from these plants. Moreover DISCOMs in their filings are claiming that they are adopting fixed costs as approved by the Commission. According the norms/regulations in operation after the enactment of power sector reform Acts both at state and central level at the first stage PPA between the generating company and distribution licensee shall be approved by the Commission followed by financial closure. After this erection of plant and machinery starts and COD needs to be declared before the distribution licensee starts receiving power from the generating station. All these steps are skipped in the case of the new GENCO plants. Though the draft PPAs are with the Commission for more than four years the Commission could not find time examine these PPAs.</p>	Station	Capacity MW	Fixed Cost	KTPS VI	500	1.79	KTPP I	500	1.79	KTPP II	600	2.25	UMPP – Mundra	4000	0.98	Not in purview of discom
Station	Capacity MW	Fixed Cost															
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13.	<p>4.2.4 Fixed costs of these new thermal power plants are high. Compared to the Ultra Mega Power Plant at Mundra in Gujarat set up by Tatas and which started power generation the fixed costs of the above plants proved to be very high. The fixed costs of these plants are higher by more than 75% to 100%.</p>	UMPP from economies of scale and tax benefits tend to have a lower cost per unit. Also Fixed cost per unit changes every year with increase in O&M expenses, reduction in loan amount, reduction in interest cost. Hence, the Fixed cost of new stations coming up in Telangana & AP cannot be compared to UMPP.															

<p>15.</p>	<p>Variable/Fuel cost</p> <p>4.3.1 DISCOMs propose to adopt variable cost escalation of 2%. In case there is any change in fuel prices during the ensuing year the same may be addressed through the existing regulation or Fuel Surcharge Adjustment (FSA) may be reintroduced. There is no need to adopt the proposed variable cost escalation.</p> <p>4.3.2 Variable cost of power from Hinduja National Power Corporation Limited's plant is estimated to be Rs. 1.86 per unit. Compared to this variable cost of power from NTPC's Simhadri units is estimated to be Rs. 2.60 per unit. While source of fuel (coal) for both the plants is the same (Mahanadi Coal Fields) NTPC's units' variable cost is higher by nearly 40%. This needs to be looked in to.</p> <p>4.3.3 Variable cost of KTPS VI unit (Rs.2.73 per unit) is higher than other units located at Kothagudem. This is because of allocation of coal from Mahanadi Coal Fields rather than from Singareni units. As swapping/rationalisation of coal allocation is in operation KTPS VI unit shall also get its fuel from Singareni units. This will help to bring down cost of power from this unit.</p>	<p>1. It is to be noted all thermal stations run predominantly on thermal coal supplied from domestic sources like MCL, SCCL etc. while imported coal is been used only in case of domestic coal shortfall.</p> <p>With increase in rail freight rates for coal by 6.3% and increase in green cess to Rs. 200 per metric tonne, the cost of coal is expected to increase significantly which would increase the variable cost of production</p> <p>Still, TSDISCOMS have taken a conservative estimate and projected the increase in variable cost only by 2%. TSDISCOMS request Hon'ble Commission to consider this nominal escalation</p> <p>2. Variable cost of plant depends on the coal mine from which coal is tapped, transportation charges which might include rail, road, seafreight charges. Additionally, factors like efficiency of the power plant, consumption of secondary oil, washing of coal would impact the variable cost of power production. Hence, even though the power plants are located at the same venue, it need not be necessary that the variable cost is same</p> <p>The Variable Cost of Simhadri STPS is considerably high when compared to the Variable Cost of HNPCL as 40 % of required Coal is being imported for the Simhadri STPS.</p> <p>The NTPC is using 60 % of indigenous Coal and 40% of imported Coal for the Simhadri Super Thermal Power Station in view of the shortage of indigenous Coal.</p>
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		<p>The HNPCL has yet to start generation and Variable Cost arrived by HNPCL is based on 100 % of indigenous Coal</p> <p>Originally KTPS-Vi stage is totally linked to Ms Mahanadi coal fields Ltd. To an extent of 2.31 million tonnes per annum. Ministry of Coal, GoI has swapped the coal linkage from MCL to SCCL. Fuel supply agreement will be entered with the SCCL for supply of Coal to this unit.</p>
16.	<p>4.3.4 Use of imported coal continues to be source of concern, both in terms of price as well as quality. Following objections raised by the public during public hearings the Commission has given several directions in the case of utilisation of imported coal by central generating stations as well as APGENCO units. TSDISCOMs in their replies in response to these directions merely mentioned that TSGENCO plants would not be using imported coal. Under the provisions of the AP Reorganisation Act TSDISCOMs also will be accessing power from CGS and APGENCO thermal units which are using imported coal. In this regard TSDISCOMs also need to pay attentions to the directives issued by the Commission related to utilisation of imported coal.</p>	<p>TSDISCOMS would adhere to the directives issued by the Hon'ble Commission</p>
17.	<p>4.3.5 In its reply related to transit loss of coal TSDISCOMs mentioned that they were not considering the transit loss of coal, if loss was more than the normative one. This implies that excess transit loss of coal if any will be borne by GENCO. In this context we would like know what is the exact transit loss of coal of the coal based thermal power plants of TSGENCO and APGENCO from which TSDISCOMs are procuring power.</p>	<p>The transit loss of coal for TSGENCO Thermal Stations is in the order of 1.0.</p>
18.	<p>4.3.6 One of the important reasons for increase in power purchase costs is hike in natural gas price by the central government. Price of natural gas increased from \$ 4.2 per MBTU to \$ 5.61 per MBTU. Following this variable cost of power produced from gas based power plants increased.</p>	<p>Noted</p>

	<p>Variable Cost Rs/U</p> <table border="1"> <thead> <tr> <th>Plant</th> <th>2013-14</th> <th>2015-16</th> </tr> </thead> <tbody> <tr> <td>GVK</td> <td>2.19</td> <td>2.62</td> </tr> <tr> <td>Spectrum</td> <td>2.48</td> <td>2.76</td> </tr> <tr> <td>Lanco</td> <td>2.25</td> <td>3.02</td> </tr> <tr> <td>Reliance</td> <td>1.64</td> <td>3.44</td> </tr> </tbody> </table>	Plant	2013-14	2015-16	GVK	2.19	2.62	Spectrum	2.48	2.76	Lanco	2.25	3.02	Reliance	1.64	3.44	
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19.	<p>4.3.7 The new natural gas price adopted by the Gol goes against the norms of price fixation, against the PSC and also orders of the Supreme Court. This shall not be allowed. As the consumers of Andhra Pradesh will be severely adversely affected by this APDISCOMs and GoAP should have taken initiative to see that this price is rolled back. These should have explored all avenues to bring down this price, including approaching the Supreme Court. As variable costs are pass through APDISCOMs are least bothered about this burden on the consumers. In the meantime E.A.S Sarma, former Secretary, Gol and Gurudas Dasgupta filed a petition in Supreme Court challenging the above gas price. We request the TSDISCOMs and the GoTS to implead in this case before the Supreme Court. This request is not a misguided one given the APERC's observations in its Order on GVK that DISCOMs will take care of consumers' interests.</p>	Noted															
20.	<p><u>How short term purchases are made without regulatory approval?</u></p> <p>4.4 During the FY 2014-15 TSDISCOMs procured 8,713 MU through short term/market purchases constituting nearly 18% of the power procured in the state. Most of this power is procured without regulatory approval and in a non-transparent manner. Even when additional demand was only during peak period power through short term purchases was procured under round the clock (RTC) terms. Because of this during non-peak periods in order to accommodate short term purchases made under RTC terms cheaper GENCO plants were being backed down. This led to unnecessary burden on</p>	During FY 14-15, energy requirement has been significantly higher than the energy availability. Also due to a bad monsoon year, Hydel energy availability has significantly reduced. To fulfil the promise of providing 7 hours of supply to Agriculture consumers, TSDISCOMS had to resort to power purchase from Short term sources.															

	<p>TSDISCOMs and in turn on consumers in the state. TSDISCOMs as the filings show will be procuring power through short term purchases during 2015-16. Also, state leadership is exhorting DISCOM officials to procure power at any cost. Keeping past experience in mind short term purchases shall be made in an optimum manner, specifically to meet peak deficits, but not on RTC terms.</p>																			
21.	<p>5.1 Financial Restructuring Plan (FRP) is introduced by the Gol in the name of ensuring the financial viability of the DISCOMs. Though introduced by it the Gol does not take any financial responsibility of ensuring the financial viability of the DISCOMs. According to this Plan the state government will stand guarantee to the bonds issued to cover 50% of the accumulated losses. From DISCOMs' filing it is not clear whether the State Government will repay the bonds or DISCOMs have to pay them and in case of their default only the State Government will come in to the picture. Apart from this, the bonds issued by the state government covers only 40% of the accumulated losses, not 50% as envisaged in the Plan.</p>	<p>The State Govt is required to take over 50 % of the outstanding short term liabilities (STL) corresponding to the accumulated loss as per audited accounts of the DISCOMs as of March 2013 , the cutoff date for implementation of FRP in combined State.</p> <p>Initially Bonds are issued by the DISCOMs and GoTS will take over the bonds in two to five years depending upon its fiscal space.</p> <p>DISCOMs are taking up the issue to take over the bonds in FY 2014-15 itself by GoTS</p> <p>Interest and repayments of bonds is the liability of GoTS. Further, GoTS has already paid Rs227 Crs interest on bonds relating to first half of FY2014-15.</p>																		
22.	<p>5.2 According to the TSDISCOMs' filings the remaining 60% losses need to be structured as loans with a three moratorium for paying principal amount. The two DISCOMs propose to convert losses to the extent of Rs. 2,450 crore in to short term loans, constituting only 40% of their burden. Then, what will happen to the remaining 60% of their loss burden?</p>	<p>The details of losses and contribution of each components is already enclosed in the Director's Report of the company Annual accounts 2012-13 which is again reproduced below .</p> <p style="text-align: center;">TSNPDCL For FY 2012-13</p> <table border="1" data-bbox="1234 1117 1751 1446"> <thead> <tr> <th>Particulars</th> <th>Rs. In Crores</th> </tr> </thead> <tbody> <tr> <td>Government receivables</td> <td>2,050.89</td> </tr> <tr> <td>Power purchase cost</td> <td>867.07</td> </tr> <tr> <td>Revenue from sale of power</td> <td>239.05</td> </tr> <tr> <td>Other expenses</td> <td>189.76</td> </tr> <tr> <td>Finance cost</td> <td>109.52</td> </tr> <tr> <td>Employee cost</td> <td>87.65</td> </tr> <tr> <td>Revenue from sale of power</td> <td>85.3</td> </tr> <tr> <td>Trade receivables</td> <td>9.72</td> </tr> </tbody> </table>	Particulars	Rs. In Crores	Government receivables	2,050.89	Power purchase cost	867.07	Revenue from sale of power	239.05	Other expenses	189.76	Finance cost	109.52	Employee cost	87.65	Revenue from sale of power	85.3	Trade receivables	9.72
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		<p>DISCOMs have raised STL to meet expensive power purchase cost, increase in power purchase cost due to inflation and cost associated delayed collection of FSA etc . The GoAP/GoTS had agreed to take over their commitment towards expensive power purchase.</p> <p>Accordingly,50% of STL will be taken over by GoTS as per scheme and balance 50% of STL is due to the</p> <p>1) Restriction of T&D losses to the extent of approved losses while approving FSA,</p> <p>2) restriction of agriculture consumption to the extent of approved quantity in the T.O in the FSA orders</p> <p>Eventually led to Difference of FSA between filed and approved by the Hon'ble APERC for the FY 2011 to 2013.</p> <p>The scheme basically meant to make DISCOMs financially viable and to restructured the short term loans and GOI proposed that, the 50% of STL shall be issued in the form of bonds to Banks. The bonds will be repaid by GoTS alongwith interest.</p> <p>The scheme proposes to restructure the balance of Short terms Loans to the extent of 50% of Short term loans outstanding as on 31-03-2013. The interest and repayment of restructured loans will be the commitments of DISCOMs.</p>
23.	<p>5.3 TSDICOMs submitted, "The key components of above losses are unapproved portion of Fuel Surcharge Adjustment (FSA) for the years 2009-10 to 2011-12, FSA cases pending in courts and Govt receivables over and above Rs. 4,553.85 Crs which is agreed by Govt as final settlement". Apart from the DISCOMs did not provide any</p>	<p>The details of statement of losses depicting and contribution of each components are as follows.</p>

details on the sources of these accumulated losses. Unapproved FSA amounts cannot be recovered without sanction from the TSERC and the Courts in question. Again in the case of TSERC, it cannot approve the pending FSAs without following the public process as mandated by the High Court in earlier cases. The above passage also mentions Govt receivables. From this it is not clear whether these are receivable by Govt from DISCOMs or by DISCOMs from Govt. In fact it should be receivables by DISCOMs from Govt. In the past the state government directed the DISCOMs to purchase power from market at high prices assuring that it will bear higher the expenditure. The DISCOMS also mentioned," The bonds issued cover the expensive power purchased by the TS DISCOMs for the period 2008-09 to 2013-14." (p.50 SPDCL Filing) After that it reneged on its assurance. According to the MYT framework surplus/deficit need to be analysed at the end of the control period in detail before approving the same. But it was not done in the case of first as well as second control periods. In the background of the above we request the Commission not to approve the above interest cost and direct the DISCOMs to make all information related to the above public.

TSNPDCL For FY 2012-13

Particulars	Rs. In Crores
Government receivables	2,050.89
Power purchase cost	867.07
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Since, the discoms are claiming the interest on STL restructured loans which is the part of FRP scheme, the restructured loan is the liability of DISCOMs as per scheme and the DISCOMs can only pay the debt service on the restructure loans through ARR .There is no additional resources to meet the debt servicing cost of DISCOMS.

DISCOMs are only claiming interest and will claim the repayments of EMI from the beginning of 4th year of FRP implementation. the soft copy of FRP scheme approved by the GoAP can be shared with hon'ble objectors as desired by them .

24. **6.1** TSDISCOMs claim Rs. 1,463.30 crore under true up for the FY 2013-14 and 2014-15. But they do not provide any justification for the same. Even whatever information provided by them is confusing. TSSPDCL in its filing (pp.50-51) mentioned revenue of Rs. 13,295 crore for the year 2013-14 and supply cost of Rs. 11,865 crore, but mentioned the difference between the two (true down) as Rs. 161.74 crore.

The TSNPDCL has claimed for an amount of Rs. 49 Crores and Rs. 293 Crores for FY 2013-14 and FY 2014-15 respectively under true up along with carrying cost. In absence of the Tariff Order for the FY 2014-15, TSNPDCL has claimed provisional revenue gap for the FY 2014-15 as a true up.

25. **6.2** One of the important reasons for this revenue gap is higher fuel costs. According to a recent report of CAG (see Annexure I) Reliance Industries Ltd received higher price than allowed. According to this

Noted

	<p>report, "As per the price discovery process undertaken by the operator (RIL)... it was categorically indicated that selling price would be rounded off to two decimal points... A review of records relating to sales of gas to consumers, however, revealed that the operator has been charging the gas price at the rate of \$4.205 per unit (three decimal points) from its consumers in place of USD 4.20 per mmBtu, arrived at after rounding of 2 decimal points". The draft of the second audit of the field's books, submitted by the Comptroller and Auditor General to the oil ministry for comments, says Reliance was charging consumers by rounding off the price in three decimal units against the norm of two decimal units, leading to excess billing of \$9.68 million in the first four years of production beginning 2009-10. TSDISCOMs shall be directed to recover the excess amount paid and to that extent true up amount shall be brought down.</p>	
26.	<p>6.3 According to newspaper reports (See Annexure II) the Directorate of Revenue Intelligence has unearthed a scam involving companies inflating the value of coal imports from Indonesia for their power plants. Initial estimates by the agency pegged the overvaluation at Rs 29,000 crore in the period 2011-2014. DRI has raided over 80 shipping companies, intermediaries and laboratories across the country including, Andhra Pradesh in search of documents that show the real value of the imports. Almost all laboratories testing coal in India have been searched by the DRI to obtain the lab reports for verification of the calorific value of the imported coal. According to this investigation almost every importer, including the reputed corporate – public and private, have indulged in overvaluation of coal imports. DRI is learnt to have recovered documents showing the real value of the imports. The overvaluation has an impact on the tariff paid by consumers here as power companies could have a higher tariff fixation based on the inflated rates. It was estimated that the power tariff would be less by Re 1 per unit if the value of imported coal value was not inflated. In the past during public hearings objectors have pointed out many anomalies in imported coal including higher prices. As this is upheld by the investigation of DRI we request the Commission not to allow the true up demanded by DISCOMs to the extent of over valuation of imported coal.</p>	Noted

27.	<p>Estimation of agriculture consumption (MU)</p> <table border="1" data-bbox="264 219 905 462"> <thead> <tr> <th></th> <th>2013-14</th> <th>2014-15</th> <th>2015-16</th> </tr> </thead> <tbody> <tr> <td>NPDCL</td> <td>4348</td> <td>4715</td> <td>4904</td> </tr> <tr> <td>SPDCL</td> <td>6694</td> <td>7238</td> <td>7528</td> </tr> <tr> <td>Total</td> <td>11042</td> <td>11953</td> <td>12432</td> </tr> </tbody> </table> <p>7.1 Filings of NPDCL as well as SPDCL show that power consumption in the agriculture sector in Telangana is increasing irrespective of the situation on the ground. The above consumption figures are arrived at by the DISCOMs on the basis of their claim that they are supplying power for 7 hours per day (p.64, SPDCL). This is far from truth. Most of the time, farmers are not receiving not even four hours of supply in a day. As such the Commission shall not take the above consumption figures in to account.</p>		2013-14	2014-15	2015-16	NPDCL	4348	4715	4904	SPDCL	6694	7238	7528	Total	11042	11953	12432	<p>In the current and previous year, the licensee has imposed the load restriction to certain categories such as domestic, commercial and industrial consumers to maintain grid stability under insufficient power availability duly maintaining 6 to 7 Hrs per day power supply to Agriculture consumers to the maximum extent possible.</p> <p>The licensee has been estimated Agriculture consumption based on ISI methodology as approved by the Hon'ble Commission from October 2013 onwards.</p> <p>Agl consumption estimation in TSNPDCL is being carried-out on the basis of ISI Methodology wherein energy meters are provided to the selected DTRs (Sampled DTRs) and the average consumption recorded in a given capacity of the DTR is calculated. This average consumption multiplied by the total number of the same capacity DTRs will be the total Agl consumption on the capacity of DTRs. Similarly, the total Agl consumption on the other capacities of DTRs is arrived. The total Agl consumption on all the capacities of DTRs (16 KVA, 25 KVA, 63 KVA & 100 KVA) will be the total Agl consumption estimation in TSNPDCL.</p>
	2013-14	2014-15	2015-16															
NPDCL	4348	4715	4904															
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Total	11042	11953	12432															
28.	<p>7.2 The fact that the agriculture consumption figures provided by the DISCOMs are anomalous comes out from their filings. According to their filings while 9,78,028 pump sets under SPDCL will be consuming 7,528 MU during 2015-16, under NPDCL 10,73,870 pump sets will be consuming 4,904 MU. In other words per pump set consumption will be 7,528 units under SPDCL, it will be 4,567 units in the case of NPDCL. Per pump set consumption in SPDCL will be nearly 70% higher compared to NPDCL, even while hours of supply of electricity are the same under both DISCOMs.</p>	<p>In TSNPDCL, the total number of Agl DTRs of the capacities said above, is 1,28,011. Out of the, energy meters were provided on 3,168 DTRs of the above said DTRs. The readings from these energy meters are taken every month and arriving monthly Agl consumption estimation.</p>																
29.	<p><u>Agriculture consumption during 2013-14</u></p> <table border="1" data-bbox="264 1218 898 1430"> <thead> <tr> <th>Particulars</th> <th>NPDCL</th> <th>SPDCL</th> </tr> </thead> <tbody> <tr> <td>Pump sets with DSM</td> <td>9,75,729</td> <td>10,93,743</td> </tr> <tr> <td>Pump sets without DSM</td> <td>3,086</td> <td>5,275</td> </tr> </tbody> </table>	Particulars	NPDCL	SPDCL	Pump sets with DSM	9,75,729	10,93,743	Pump sets without DSM	3,086	5,275	<p>In TSNPDCL, the total number of Agl DTRs of the capacities said above, is 1,28,011. Out of the, energy meters were provided on 3,168 DTRs of the above said DTRs. The readings from these energy meters are taken every month and arriving monthly Agl consumption estimation.</p>							
Particulars	NPDCL	SPDCL																
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Energy consumed by Pump sets with DSM (MU)	4,355.6	9157.93
Energy consumed by Pump sets without DSM (MU)	5.77	32.19
Average consumption of Pump sets with DSM (U)	4,464	8373
Average consumption of Pump sets without DSM (U)	1,870	6102

Also, it is planned to provide energy meters to 10% of the total existing Agl DTRs and hence the accuracy of Agl consumption estimation will be improved further. Based on the above actual estimated Agl consumption of H1 of 2014-15, the licensee expects growth rate of 4.00% for the H2 of FY 2014-15 and FY 2015-16 over the H2 of FY 2013-14 and revised estimates of FY 2014-15.

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

30.	<p>7.4 Subsidy towards free power to agricultural services is being provided on the basis of 7 hours of power supply to these services. But in reality farmers are getting power for less than five hours. This implies that DISCOMs were compensated more than necessary to supply free power to agriculture. The excess subsidy paid to DISCOMs in this regard shall be recovered.</p>	<p>The Government subsidy towards agriculture consumption for the year is provided as per approved Agl consumption in the Tariff Order issued by the Hon'ble Commission. However, the actual agriculture consumption of the licensee is higher than the approved by the Hon'ble Commission.</p>
31.	<p>7.5 In the absence of metering of agricultural connections DISCOMs claimed that they have arrived at these figures following the ISI methodology suggested by the Commission. But data collected under this methodology is also not complete. To overcome this we suggest that all DTRs serving the agriculture services should be metered so that the consumption estimates are realistic. The Task Force on electricity Sector appointed by the Government of Telangana State also suggested metering of DTRs serving agriculture loads.</p>	<p>In TSNPDCL, the total number of Agl DTRs of the capacities said above, is 1,28,011. Out of the, energy meters were provided on 3,168 DTRs of the above said DTRs and arriving monthly Agl consumption estimation based on the ISI Methodology. Also, it is planned to provide energy meters to 10% of the total existing Agl DTRs to improve the accuracy further.</p> <p>Providing energy meters to all the existing Agl DTRs of 1,28,011 numbers will not only be a much financial burden on the Licensee but also obtaining their readings every month, is difficult as these Agl DTRs are located in remote locations.</p>
32.	<p>7.6 In the past the Commission (Fresh Directive No. 2 of the Tariff Order for FY 2011-12) directed the DISCOMs to furnish meter-wise readings noted and transformer-wise, feeder-wise consumptions measured on all the DTRs and Feeders covered under HVDS scheme. But the DISCOMs are not paying heed to this direction. Information provided through these readings would have thrown much light on electricity consumption in agriculture sector as well as efficacy of HVDS scheme. We request the Commission to direct the DISCOMs once again to furnish the above information at the earliest.</p>	<p>Estimating the Agl Consumption as per ISI methodology approved by the Hon'ble Commission.</p>
33.	<p>Deaths due to shocks 7.7.1 Every year hundreds of farmers are meeting death due to electrical shocks. This is highly avoidable. 7.7.2 During 2013-14 in Telangana 436 people died due to electrical shocks. More than 50% of these cases under SPDCL took place in the circles/districts of Mahabubnagar and Nalgonda. Similar is the case in the first half of 2014-15. Further these figures are an under estimate of the reality. Farmers are the main victims of this phenomenon.</p>	<p>Every effort is being made to avoid accidents, by taking up regular maintenance works like replacement of conductor, providing of inter poles , maintenance of DTRs structure and LT lines, providing of earthing. Wide publicity being given requesting Ryots not to handle with Distribution Transformers. During the FY 2014-15 the licensee has erected 4177 middle poles in the loose lines</p>

Table: Deaths Due to Electric Shocks

	2013-14	First Half of 2014-15
NPDCL	185	87
Mahabubnagar	115	69
Nalgonda	84	25
SPDCL	251	129
Total Telangana	436	216

7.7.3 The DISCOMs did not provide complete details of these incidents like for how many cases DISCOMs took responsibility and in how many cases compensation was paid and amount paid towards compensation. NPDCL mentioned that compensation was paid in 56 cases out of 185 deaths in 2013-14 and in 11 cases out of 87 deaths during the first half of 2014-15. Procedures need to be simplified to see that all victims receive compensation at the earliest.

7.7.4 Even in the electrocution deaths that the DISCOMs had taken responsibility the amount paid (about Rs. 1 lakh per person) is very meagre. Even this meagre amount was not paid properly. There is need to revise the compensation upwards like in the case of railways.

34. **7.7.5** There shall also be separate mechanism to pin responsibility for deaths due to electricity shocks. In the present case perpetrator it self is the judge. To avoid this anomaly a committee comprising different stakeholders shall go into these deaths and pronounce whether DISCOMs are responsible for these tragedies or not.

with an expenditure of RS 1.89 Crs, 23207 locations in various lines were rectified to avoid accidents.

Further works were awarded to erect 200 middle poles in each section in Discom in the coming 3 months.

Non Departmental Fatal accidents in NPDCL

	2013-14			2014-15 up to 2/2015		
	Human	Animal	Total	Human	Animal	Total
Reported by field	159	298	457	156	172	328
Exgratia sanctioned by the department	27	132	159	76	122	198

As per directions of APERC (Proceeding No.APERC/Secy/EAS/S-101/177/2013, Dt13.08.2013), the NPDCL has enhanced existing ex-gratia amount in case of fatal accidents to non departmental person and animals due to electrocution i.e. Human being from Rs.1 to 2 Lakhs, cattle from RS. 3,000 to Rs. 20,000 and goat and sheep @ Rs.4,000 respectively and sanction procedure is simplified to grant ex-gratia to victims irrespective of the mistake from any side. Further online tracking of accidents taken place in TSNPDCL and reports submission is commenced from 12/2014 to see that all eligible victims receive compensation at the earliest.

Within 24 hours preliminary report and then detailed report is being furnished by ADE. As per Government of Telangana instructions the Chief Electrical Inspector to Government is being reported about the electrical accident. Then jurisdictional Deputy Electrical Inspector will investigate the electrical accident.

35.	<p>7.7.6 More than these deaths are highly avoidable. These deaths are taking place due to neglect of rural network by the DISCOMs. Every year the Commission allowed Rs. 5 crore to be spent by the DISCOMs on safety measures to avoid such deaths. But DISCOMs did not care to utilise them. NPDCL spent Rs. 34.25 lakh during 2013-14 and Rs. 12.29 crore during first half of 2014-15. If the safety of DTRs were improved many of these deaths could have been avoided.</p> <p>7.7.7 In most of these cases it was the farmers who met this tragic end. These deaths could have been avoided if there were timely and sufficient technical support at the ground level and good quality electrical network. Most of the technical posts like linemen in rural areas are vacant and farmers are forced to attend to repair work on their own with fatal consequences. Thousands of line men posts are lying vacant since a long time. Recently Telangana State Government announced that hundreds of electrical engineers will be recruited shortly. But there is no word about recruiting line men. Filling line men posts not only bring down deaths due to shocks but also help to bring down T&D losses and thereby add to the income of the DISCOMs.</p>	<p>Rural network is strengthened by incorporating additional improvement of transformers, substations and sanction of HT and LT lines in year 2014-15. Tom-tom is done in the villages not to meddle the DTRs for avoiding the Electrical accidents. The Spacers are used to prevent accidents in case of snapping of LT lines. The 11 KV breakers at 33/11 KV substations are put in trimmed condition for cutting of the power supply in case of snapping of 11 KV conductor. Higher size of conductor is replaced where the lines are overloading.</p> <p>Tom-tom is done in the villages about not to meddle the DTRs for avoiding the Electrical accidents. To support the field staff, the labour @ Rs 4000/- per month is deployed in TSNPDCL for extending better services in 250 distributions.</p>
36.	<p>Quality of Power</p> <p>7.8.1 Electricity received by the farmers was of uneven quality with unpredictable interruptions. Power supply timings announced by the Licensees are not being adhered to. It is the responsibility of the Commission under Section 86 (1) (i) of the Electricity Act, 2003 to enforce standards with respect to quality, continuity and reliability of service by licensees.</p> <p>7.8.2 In the past DISCOMs used to post feeder-wise electricity supply details on their websites. But they stopped this practice suddenly some time back. We request the Commission to direct the DISCOMs to post all relevant information on quantum and quality of supply on their websites.</p>	<p>Voltages and quality of power supply to consumers is closely monitored from corporate office level whenever the complaint is received regarding low voltages and poor quality of supply.</p> <p>Everyday 11KV feeder wise electricity supply details are received from field on the same day night hrs and will be reviewed regularly.</p>

37.	<p>DTR failure/repair</p> <p>7.8.4 DISCOMs are also not attending to maintenance of DTRs properly. Farmers are being forced to incur expenditure in transporting the DTRs. DTRs are also not being repaired in time. DISCOM staff are also collecting money from farmers to repair DTRs. They are not attending to repairs until the farmers pay up. In Kanugutta village of Both mandal in Adilabad district it took 10 days to repair the DTR. In Madaka village of Odelu mandal in Karimnagar district it took more than one week to repair the transformer while under Standards of Performance DTRs in rural areas shall be repaired within 48 hours.</p>	<p>Presently 3629No.s Healthy DTRs are available under Rolling stock of TSNPDCL and any failed DTR can be replaced with in 24Hrs.</p> <p>Regarding failure of DTR in Kanugutta village of Both mandal in Adilabad district, it is a 63KVA DTR and failed repeatedly on 20-01-2015 and 5-02-2015.The consumers are drawing water from near by Kharat project canal and Peddavagu canal by using unauthorized pump sets and DTR is failing on overload. It is instructed to replace the failed DTR immediately and action may be taken against illegal connections. Further there is no complaint of failure DTR in Madaka with 1week duration in this Rabi season.</p>
38.	<p>7.8.5 Low quality of power in rural areas is also because of crumbling transmission and distribution network in rural areas. Decades old conductors are hanging low endangering lives as well as resulting high transmission losses. Many of the DTRs are more than decade old and should have been replaced. Added to this many of these DTRs do not have even AB switches. Depreciated and old parts of T&D network shall be replaced in keeping with prudent maintenance of the network in good health.</p>	<p>The old conductors are replaced in phased manner. The old DTRs having age more than 25yr. and drawing more magnetizing currents are survey reported and replaced with new DTRs. Due to complaint of theft of DTRs and meddling of DTRs, small capacity of DTRs are erected and controlled group of DTRs with one AB switch.</p>
39.	<p>DSM Measures</p> <p>7.9.1 To be eligible for free power, farmers have to undertake demand side management (DSM) measures i.e., installation of capacitors, ISI marked pump sets, HDPE or RPVC piping and frictionless foot-valve. These measures are proposed to bring down quantum electricity consumption in the agriculture sector there by reducing financial burden both on the state government and farmers. Farmers also would like to contribute to this endeavour. Though farmers are interested in taking them up they are facing hurdles in implementing them.</p> <p>7.9.2 DISCOM officials are claiming that more than 90% of the farmers have installed capacitors. But truth is that not even 10% of the farmers installed capacitors. Farmers do not have technical assistance in the form of access to linemen or assistant linemen, to take this up.</p>	<p>Agriculture services are being released for the consumers who have paid DDs.</p>

	<p>thousands of line men posts in rural areas are lying vacant. Even where linemen or assistant linemen are available they do not have proper knowledge in installation of capacitors. Installation of capacitors at a wrong point led to burning of pump sets, which scared other farmers from doing the same.</p>	
40.	<p>7.9.3 A pilot implemented by SPDCL (p.88) power consumption declined by nearly 10% after installation of capacitors. This implies that by spending Rs. 60 crore to install capacitors at 20 lakh pump sets in Telangana DISCOMs will be able to save about Rs. 500 crore. This alone shall spur the DISCOMs to implement capacitor programme on war footing.</p>	
41.	<p>7.9.4 Use of ISI standard pump set is another important DSM measure. Present pump set efficiency in the State is only 25% and this could be increased to 50% by using ISI standard motors. For proper operation of ISI standard pump sets minimum voltages are required. Under prevailing low voltages in the state these ISI motors do not work. Because of this low voltage, farmers are forced to go in for locally made pump sets which operate even under low voltages. One of the reasons for low voltage is overloading of distribution transformers (DTR) installed for agricultural purposes. This overload is to the extent of 25 to 50%. If this overload problem is addressed successfully farmers can think of using ISI standard motors. This can be addressed by increasing the number of DTRs of adequate capacity in the agriculture sector. We request the state government and DISCOMs to install additional DTRs to solve low voltage problem so that farmers will be emboldened to go in for ISI standard motors.</p>	<p>Improvement of DTRs and Erection of new 33/11 KV and 132/33 KV substations are proposed for improvement of voltages at tail end of consumer. Wherever the authorized overloading is noticed, the additional DTR of adequate capacity in the agriculture sector at load centre is installed. The present day voltage will be suitable for ISI pumpsets.</p>
42.	<p>7.9.5 Though the farmers may be willing to install ISI standard motors in the event of voltages improving the financial burden on them will be onerous and it will be good to explore the ways of minimizing burden on them in replacing the non-standard motors with ISI standard motors. In Tamil Nadu, the State government and utilities are said to have taken up a programme where a third party – Electricity Service Company (ESC) – takes the responsibility of replacing the motors and is given a share in the savings of electricity consequent to installation of standard motors. We request the State government to explore this option also as it will not burden the state government as well as the farmers.</p>	<p>It is not the purview of the Licensee as it is a policy matter.</p>

43.	<p>7.10.1 Since 2005 HVDS programme is taken up in the state as a solution to the low voltage problem. Until now thousands of crores of rupees were spent on this but not even 10% of the pump sets were covered. A HVDS transformer is five times costlier than the regular DTRs being used at present. It was felt that if the same amount was spent on adding regular DTRs by this time the low voltage problem would have been solved. Even if the present additional load on existing DTRs is assumed as 50% then the estimated expenditure would be 50% of the cost of the existing DTRs. If we want to replace all the DTRs with HVDS DTRs the expenditure would be five times. The question is why spend 550% more when we could achieve with 50% only. We may be wrong in these calculations. Farming community in the state does not have any information on or insight in to this HVDS programme. Farming community in the state should have been taken in to confidence while formulating solution to low voltage in rural areas. This is not too late. We request the state government as well as the DISCOMs to place all the information related to HVDS before the public including farmers for an informed discussion on the problems being faced by both the DISCOMs and farmers in the state that will lead to a solution that is beneficial to all stakeholders.</p>	<p>2,49,845 Agl services are converted into HVDS since 2005 out of 1007669 Agl services existing in TSNPDCL as on 28.02.2015. This shows that 24.7% Agl services are converted into HVDS until now.</p> <p>Further 1,24,335 Agl services are covered under JICA which is programmed upto FY 2016-17. This shows that 37% of the pumpsets are covered. Balance pumpsets will be taken up in phased manner.</p>
44.	<p>7.10.2 Over the last few years hundreds of crores were spent on implementing HVDS for agriculture pump-sets. The present filings also show that DISCOMs plan to spend more money on this. Before taking this programme forward there should have been a thorough review of its implementation until now. But there appears to be no such exercise. Given the serious implications of this investment (Consumers have to bear this burden in the form of higher cost of service) we place below our analysis of the investment under HVDS.</p>	<p>Envisaged benefits are achieved on HVDS implemented 11 KV feeders. The transformers failures are decreased and theft of energy is arrested. The voltage are increased at consumer side, Reliable and quality power being supplied to all the consumers and they were satisfied with HVDS. Further 11 KV line losses are decreased.</p> <p>The benefits accrued after implementation of HVDS are computed and enclosed as annexure (A).</p>
45.	<p>7.10.3 For the following analysis we have compared LT – DTR and HVDS. We have taken the transformer capacity as 63 kVA. Hours of supply in a day is assumed as 7 hours and number of days as 240 days. Cost of power is assumed as Rs. 3.00 per unit. We examined this under three power factor capacities – 0.6, 0.7 and 0.8</p>	<p>The HVDS works were taken up after analyzing the losses as a major factor. The distribution losses reduced is to be considered as saving in the natural resources like coal, gas, etc., used for power generation. In addition to the above DTRs are shifted to the load centers in HVDS duly improving the voltage profile in the LT system.</p>

The results of our analysis are presented in the following table. In this table reduction in line losses are taken as returns on investing on HVDS.

Power Factor	Cost of HVDS (Rs.)	Cost of Lt – DTR (Rs.)	Additio nal Cost (Rs.)	Returns per year from HVDS (Rs.)	Payback period (Years)
0.6	6,29,628	1,15,000	5,14,628	18,949	27.16
0.7	6,29,628	1,15,000	5,14,628	13,923	36.96
0.8	6,29,628	1,15,000	5,14,628	10,660	48.28

46. **7.10.4** In Andhra Pradesh a power factors of 0.70/0.80 reflect the prevailing situation. Under these conditions it takes 37 to 48 years to recover the investment made in to the HVDS system, let alone profits over it. In other words the payback period for these investments is about 37 to 48 years. The guaranteed life of these transformers is about 3 years and its life may extend up to 10 years, but its' payback period is several times more. Thus, financially speaking the HVDS does not appear to be attractive. Still the DISCOMs in the state are rushing in to implement it on large scale. And farmers are being coerced in to accepting it.

Farmers are very much in support of HVDS system and farmers are requesting for HVDS system to their pump sets as there is good voltage profile and better discharge of water.

Year wise pump sets covered and expenditure incurred un HVDS system are placed below.

47. **7.10.5** One of the important reasons shown in promoting the HVDS system was elimination of unauthorised agriculture connections and theft. Experience in other states like Rajasthan and Uttar Pradesh shows that HVDS is not a deterrent to these practices and even under HVDS system theft continues to take place. We hear that Noida Power Company Limited (NDPL) in UP which went in to HVDS on a large scale is now thinking about winding it up.

Year	No.of Pump Sets	Amount in Rs. Crs
2005-06	44729	83.13
2006-07	5232	6.52
2007-08	14437	35.44
2008-09	13672	50.63
2009-	77648	68.35

7.10.6 Though the returns from this HVDS scheme are doubtful it will surely end up as a huge burden on the consumers in the form of Cost of Service (COS) as these transformers are four times more costly than the present transformers.

7.10.7 Based on these facts we request the Commission to review the past implementation of the HVDS in the state and also to put the presently proposed scheme with the support of JIBC to strictest test. We also request the Commission to direct the DISCOMs to provide us information on amount spent on HVDS and number of pump sets converted to HVDS each year since the programme was taken up.

10		
2010-11	20460	78.59
2011-12	26332	80.06
2012-13	13771	52.8
2013-14	7621	25.27
2014-15	25943	80.28
Total	249845	561.07

48. Directives on running neutral wire

7.10.8 In the past the Commission directed the DISCOMs to run neutral wire from 33/11 kV substations to all single phase transformers, particularly in the back ground accidents with single phase HVDS transformers. TSSPDCL replied that instruction were issued for preparation of estimates under T&D improvements and furnishing proposals under feeder works for executing the work of running of neutral wire in villages. One thing is even after such a long time they are still in the stage of preparing the estimates. Another thing is that as DPRs of HVDS includes cost of running neutral wire from HVDS DTR to the substation preparation of estimates and new expenditure shall not arise. The whole affair also shows that DISCOMs are least bothered about safety of the consumers.

Due to financial constraint TSNPDCL has programmed to take up to run neutral wire from 33/11 KV SS to all single phase transformers in a phased manner. The details are as follows.

Circle wise Target / Achieved to erect Neutral wire in Kms.													
Financial Year	Phase	WGL		KNR		KMM		NZB		ADB		NPDC	
		Target	Achieved	Target	Achieved	Target	Achieved	Target	Achieved	Target	Achieved	Target	Achieved
2014-15	I	150		157		120	137	150		120		697	137
2015-16	II	300		300		300		300		300		1500	0
2016-17	III	300		300		300		300		300		1500	0
2017-18	IV	300		300		300		300		300		1500	0
2018-19	V	300		300		300		300		300		1500	0
2019-20	VI	300		300		300		300		300		1500	0

(*) In Khammam circle 137 Km of line work is completed.

In Karimnagar circle 1023 Km line sanctioned and work is to be taken up.

		<p>Further, it is to inform that cost of running neutral wire from HVDS DTR to the substation will be included in the DPRs of Single phase HVDS if the scheme is taken up in future.</p>															
49.	<p>8.1 Filings of both the TSDISCOMs show that on the T&D losses front the situation in fact is deteriorating. During 2015-16 T&D losses in NPDCL area will be 15.56% and in SPDCL area 14.91%. There is scope to bring down these losses below 7%. Way back in 2010-11 EPDCL of Andhra Pradesh clocked T&D losses of 6.96%. DISCOMS shall be directed to take concerted action to bring down these losses. Lower T&D losses lead to lower power purchase cost and lower tariff burden.</p>	<p>The Licensee is putting most efforts in reducing losses. Regular network strengthening works for reduction of technical losses with various schemes are being taken up and necessary steps are being taken up for reducing commercial losses by conducting regular DPE inspections. TSNPDCL has under taken various loss reduction measures distribution losses have brought down from 30.52% in 2000-01 to 14.89% in 2013-14.</p> <p>The actual Distribution losses for the FY 2013-14 and projected distribution loss for FY 2014-15 and FY 2015-16 tabulated below</p> <table border="1" data-bbox="1234 776 1808 883"> <thead> <tr> <th rowspan="2">Particulars</th> <th>2013-14</th> <th>2014-15</th> <th>2015-16</th> </tr> <tr> <th>Actual</th> <th>Proj.</th> <th>Proj.</th> </tr> </thead> <tbody> <tr> <td>Discom Losses (incl EHT) (%)</td> <td>13.32%</td> <td>11.97%</td> <td>11.18%</td> </tr> <tr> <td>Discom Losses (Excl EHT) (%)</td> <td>14.89%</td> <td>13.41%</td> <td>12.58%</td> </tr> </tbody> </table>	Particulars	2013-14	2014-15	2015-16	Actual	Proj.	Proj.	Discom Losses (incl EHT) (%)	13.32%	11.97%	11.18%	Discom Losses (Excl EHT) (%)	14.89%	13.41%	12.58%
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50.	<p>8.2 Within TSSPDCL the Hyderabad South Circle T&D losses are in the range of nearly 50% of the power supplied. During the past hearings also we have brought this to the notice of the Commission. Last year the High Court treated a letter written by an electricity consumer as a petition and after hearing different parties directed the authorities to take steps to bring down these losses. Following this some raids were conducted in some of the areas falling under this circle. According to a newspaper report out of 887 services inspected there were 20 instances of theft and 350 instances of meter tampering (The Hindu, 14th April, 2014). But these raids seem to have stopped in the wake of elections to Lok Sabha and state Assembly and were not resumed after the elections. We request the Commission to direct the TSSPDCL to resume inspection of services. Bringing down these losses in Hyderabad South Circle alone will bring additional revenue of about Rs.300 crore per year.</p>	<p>The issue is not pertains to NPDCL</p>															

51.	<p>8.3 According to TSSPDCL's filings during FY 2013-14 cases were booked in 21.37% of the services inspected for malpractice. During FY 2014-15, up to 30th September 2014 cases were booked in 18.90% of the services inspected. This may be because of lack of awareness on the part of consumers or intent to benefit from malpractices and lack of proper vigilance on the part the DISCOM. TSNPDCL did not report information related to inspections. We request the Commission to direct the DISCOMs to create awareness among consumers and deal strictly with malpractices among consumers as well as DISCOM staff.</p>	<p>TSNPDCL has furnished the these information along with the filing ARR & Filing of Proposed Tariffs for the FY 2015-16 under performance parameters.</p> <p>Special focus was made on Cat-II and other High value services during inspections and booked Malpractice cases and also proposed Development charges for additional loads.</p> <p>The following progress was made during the years 2013-14 & 2014-15 (April-2014 to Feb-2015)</p> <table border="1" data-bbox="1234 597 1806 730"> <thead> <tr> <th rowspan="2">Sl.No.</th> <th rowspan="2">Year</th> <th colspan="2">Malpractice</th> <th colspan="2">Realization</th> </tr> <tr> <th>Nos.</th> <th>Amount.</th> <th>Nos.</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2013-14</td> <td>2335</td> <td>319</td> <td>304</td> <td>175</td> </tr> <tr> <td>2</td> <td>2014-15</td> <td>1134</td> <td>148</td> <td>408</td> <td>60</td> </tr> </tbody> </table>	Sl.No.	Year	Malpractice		Realization		Nos.	Amount.	Nos.	Amount	1	2013-14	2335	319	304	175	2	2014-15	1134	148	408	60
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52.	<p>Arrears</p> <p>9.1 Arrears pending for over six months to be received from consumers (with arrears above Rs. 50,000)as on 30th September 2014 stands at Rs. 2,146.34 crore (SPDCL – Rs. 1,796.07 crore and NPDCL - Rs. 350.27 crore). HT industries account for 50% of these arrears. If ordinary domestic consumers delay payments by two weeks their services are disconnected promptly. Even farmers who receive free power faces the humiliation of the starters and sometimes even motors being taken away by DISCOM employees if they fail to pay customer charges. But, how do these people with arrears to the tune of crores continue to receive power. In the past information related to court cases related to these arrears used to be provided. At present the same is missing.</p>	<p>i. All the services except the Govt. are promptly disconnected for nonpayment of CC dues.</p> <p>ii.Out of Rs. 350.27 crores, the amount outstanding from HT consumers Rs.151.41 crores. The HT consumers have approached the Hon'ble court of law on levy of PDL & PCL charges during R&C period from 12-09-2012 to 31-07-2013. The services could not be disconnected as the matter is subjudice.</p> <p>Most of the services with above Rs.50,000/- CC dues are SC/ST and Govt. services. The Govt. of Telangana has released Rs.64.54 crores towards Scheduled Caste consumers CC bills whose consumption is 0-50 units per month during the current Financial Year. The payment of CC dues in respect of ST consumers is under process.</p>																						

Annexure - A

HVDS ANALYSIS (Loss Reduction)

Description	Ghanpur M Feeder, Machareddy Section		Medaram Feeder, Dharmaram Section		Alur I & II Feeders, Dehagaon Section		TOTAL	
	Pre HVDS	Post HVDS	Pre HVDS	Post HVDS	Pre HVDS	Post HVDS	Pre HVDS	Post HVDS
Initial Raeding	11813.5 (15-01-2012)	16675.6 (15-01-2013)	9253.79 (14-12-2008)	1967.11 (14-12-2011)	175336 (01-12-2008)	3044.95 (01-12-2012)		
Final Reading	12544.1 (15-03-2012)	17539.1 (15-03-2013)	9896.2 (15-06-2009)	2542.17 (15-06-2012)	176926 (01-03-2009)	3269.33 (01-03-2013)		
Difference	730.6	863.5	642.41	575.06	1590	224.38		
Multiplication factor	1000	1000	4000	4000	400	4000		
Consumption	730600	863500	2569640	2300240	636000	897520		
Consumption per month	365300	431750	428273	383373	212000	299173	1005573	1114297
No of Services	347	444	861	885	683	992	1891	2321
Unauthorised services regularised	97		24		309		430	
Consumption per month per AGL Service	1052.74	972.41	497.41	433.19	310.40	301.59	531.77	480.09
Difference of consumption of pre to post HVDS	80.33		64.22		8.81		51.67	
Loss reduction after HVDS Conversion(A)	35666		56838		8739		119937	
% Loss Reduction	8.26		13.27		4.12		11.93	

The Chief General Manager, Coal & Commercial, AP GENCO, Vidyut Soudha, Hyderabad

S.No	Summary of Objections / Suggestions	Response of the Licensee
1	<p>The following objections are made on the power purchase cost proposed for APGENCO station for the FY 2014-15 and FY 2015-16</p> <p>As per the PPA, clause 3.1.2 (C) “ interest on pension bonds over and above specified in the Annexure (I) of the APERC PPA order dt 24.03.2003 shall be allowed as pass through in tariff of APGENCO on year to year basis. i.e. over and above scheduled interest in pension bonds.</p>	<p>The interest on pension bonds can be approved by the Hon'ble ERC after authentication of claims from time to time. And Regulation may be formulated to regulate the expenditure incurred by the Genco towards on pension bonds.</p>
2	<p>As per APERC order dt 24.03.2003, APERC order on OP No.27/2006 and OP No. 4 of 2007 interest on pension bonds over and above schedule was allowed as a pass through in tariff of AP GENCO</p>	<p>Hon'ble ERC is requested formulate a prudent method and authentication of payments on interest on pension bonds claimed by APGENCO instead allowing the claim proposed by APGENCO</p>
3	<p>APDISCOMS in their tariff filings for the year 2015-16 made provision of Rs 327 Cr towards fixed costs for Dr NTTPS O&M and Rs 174 Crs towards fixed costs for RTPP Stage I for 46.11% of consumption, including interest on pension bonds over and above schedule amounting to Rs 90.59 Crs and Rs 62.91 Crs respectively.</p>	<p>This is a statement on filing of APDISCOMs – TSDISCOMs have no Comments to offer on the method adopted by APDISCOMs .</p>

4	TSSPDCL nad TSNPDCL needs to provide Rs 382.17 Crs and Rs 203.36 Crs towards fixed cost of Dr NTTPS O&M and RTPP stage I for consumption of 53.89% including interest on pension bonds. As per tariff filings of TSSPDCL and TSNPDCL only Rs 277.56Cr towards Dr NTTPS O&M and Rs 130.33 Crs towards RTPP stage I was provided. The reason for short provision is due to non inclusion of interest on pension bonds over and above the scheduled interest.	The Hon'ble ERC may take view consider cost by adopting prudent estimate before allowing interest on pension bonds.
5	The reason for non inclusion of interest on pension bonds over and above schedule even though provision was made in PPA is not known	There is no specific regulation with respect to the claim of interest on pension bonds over and above scheduled interest.
6	It is requested to include interest on pension bonds over and above schedule even amounting to Rs 105.88 Crs and Rs 73.52 Crs provisionally in the fixed cost of Dr NTTPS O&M and RTPP stage I on par with APDISCOMS.	The above request under purview of Hon'ble ERC

D - గ్రూప్ :అభ్యంతరముల / సూచనలకు సమాధానములు

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
1.	<p>కేంద్ర ప్రభుత్వము సమీప భవిష్యత్తు లో డిస్ట్రి బ్యూషన్ ఇతర సేవల కొరకై పైవేటు సంస్థలకు అనుమతించాలనే ఆలోచనలో ఉన్నది. పైవేటు సంస్థలు ప్రవేశించిన తరువాత ప్రభుత్వ రంగ సంస్థల కార్యకలాపాలు, వ్యాపారాలను నిరోధించడానికి పైవేటు వారు వారి సమర్థతను ప్రదర్శిస్తారు వీరి కుయుక్తులు కుడా అమలు చేస్తారు కావున ప్రభుత్వరంగ సంస్థలైన డిస్ట్రి బ్యూషన్ కంపెనీలో పారదర్శకతను పెంచుతూ ప్రస్తుతం ఉన్న విశ్వంఖలమైన అవినీతిని కట్టడి చేసిజవాబుదారితనాన్ని పెంచుతూ నిజాయితీపరులైన అధికారులకు ప్రాధాన్యత ఇచ్చి సంస్థ సమర్థతను పెంచుకోవలసిన అవసరం, బాధ్యత ఉంది. కావున డిస్కాం లకు తగిన మార్గదర్శం ఇస్తూ నిఘా కుడా ఏర్పాటు చేయడానికి నియంత్రణ మండలి ద్వారా వ్యవస్థను (ఒక డైరెక్టర్, ఈ రంగంలో అనుభవం గల స్వచ్ఛంద సేవకుడు) (Consumer Welfare Performance Improvement) ఏర్పాటు చేసి, సంస్థను వినియోగదారునికి మరియు ఉపాధి పొందుతున్న, ఉపాధి ఆశిస్తున్న వర్గాల వారిని కూడా కాపాడగలరని ప్రార్థిస్తున్నాము</p>	<p>లైసెన్సీ పరిధిలో లేని అంశము.</p>
2.	<p>సాయిరెడ్డి గూడెం షాబాద్ మండలం రంగారెడ్డి జిల్లా లో లింగారెడ్డి అలియాస్ ప్రశాంత రెడ్డి అన23 సంవత్సరాల వ్యక్తి కండక్టర్ ప దుర్మరణం పాలయ్యాడు. ఇతడి గురించి ఎక్స్ గ్రేషియా ఇవ్వలేదని గత బహిరంగ విచారణలో ప్రశ్నిస్తే వారంలోగా చెల్లిస్తామని చెప్పి నెల తరువాత ఒక లక్ష రూపాయలను చెల్లించారు. గౌరవ సి. .అర్.ఎఫ్. వారు ఎక్స్ గ్రేషియా అప్పటికే రెండు లక్షలుగా పెంచారు. అయినా ఒక లక్షనే ఇచ్చారు. కండక్టర్ తెగిపడి మనుషులు ప్రమాదానికి లోనై చనిపోతారని బి. .ఎస్. గ్రామ అధ్యక్షుడు ఎ.ఇ గారికి అప్లికేషన్ ఇచ్చి రసీదు తీసుకున్న31</p>	<p>లైసెన్సీ పరిధిలో లేని అంశము.</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	రోజులకు ఈ దుర్మరణం జరిగింది. ఇది భాద్యతా రాహిత్యంతో చేసిన హత్యగానే భావించి 10 లక్షల ప్రత్యేక ఎక్స్ గ్రేషియా చెల్లించాలని ప్రార్థిస్తున్నాం	
3.	వ్యవసాయదారులకు ప్రభుత్వం తెలిపిన విధంగా 7 గంటల విద్యుత్ సరఫరా చేయడంలో విఫలం చెందుతున్నారు. విధిగా 7 గంటల విద్యుత్ సరఫరా చేయడానికి తగు చర్యలు గైకోనగలరని ప్రార్థిస్తున్నాము	విద్యుత్ సరఫరా మరియు డిమాండ్ కు మధ్య వ్యత్యాసం దృష్టిలో ఉంచుకొని విద్యుత్ వ్యవస్థను () సమర్థవంతంగా నిర్వహించుటకుగాను వ్యవసాయ విభాగానికి రోజుకు 6 నుండి 7 గంటల విద్యుత్ సరఫరాను రెండు పర్యాయాలుగా అందిస్తూ అందులో ఒక దఫా ఉదయం వేళలో అందించడం జరుగుతున్నది.
4.	HVDS ట్రాన్స్ ఫార్మర్ల ఎక్కువ ఖర్చుతో కూడుకున్నది. 5 నుండి 6 వంతులు ఎక్కువ ఖర్చు అవుతుంది. వీటికి ఖర్చుపెట్టిన స్థాయిలో లాభం ఉండడం లేదు కోట్లాది రూపాయలు డబ్బు దుర్వినియోగం అవుతుంది. దీని పై పునరాలోచన జరిపి ప్రజాధనాన్ని కాపాడగలరని ప్రార్థన. HVDS ట్రాన్స్ ఫార్మర్లకు ఎర్త్ సరిగా లేక గ్రామాల్లోని చాలా ఇండ్లకు విద్యుత్ షాక్ వస్తుంది సెల్ ఫోన్ చార్జింగ్ పెడుతూ దుర్మరణం పాలవుతున్నారు. విద్యుత్ ఉపకరణాలు టి.వి లాంటివి కూడా కాలిపోతున్నాయి.	HVDS విధానం వలన పంపిణీ నష్టాలు తగ్గి తదనుగుణంగా విద్యుత్ సరఫరా వ్యయం తగ్గుటకు కూడా దోహద పడుతుంది మరియు విద్యుత్ చౌర్యం అరికట్టుటకు దోహద పడుతుంది.. సింగల్ ఫేజ్ ట్రాన్స్ ఫార్మర్లను ఎర్టింగ్ ప్రమాణాలకు అనుగుణంగా ఎర్టింగ్ లో ఎలాంటి లోపం లేకుండా ఏర్పాటు చేయడం జరుగుతున్నది.
5.	DTR మరమ్మత్తుల విషయంలో పారదర్శకత లోపించింది. అవినీతి ఎక్కువగా ఉండి, దీని నివారణ నిమిత్తమై ప్రతీ కనెక్షన్ స్థాయిలో కేవలం ఈ పని నిమిత్తమై నలుగురు యువకులకు ఈ శిక్షణ ఇచ్చి రాత్రి ఇద్దరినీ, పగలు ఇద్దరినీ (Police Blue Coats) అందుబాటులో ఉంచి వినియోగదారుల ఫోన్ చేసిన వెంటనే వీరు అక్కడికి చేరుకొని (Pizza Delivery Boys) లాగా స్థానికంగా రిపేరు అయితే చేసిపెట్టాలి లేకుంటే అట్టి డి.టి.అర్.ను మరమత్తు కేంద్రానికి పంపించాలి స్థానికంగా మరమ్మత్తు	కాలిపోయిన/చెడిపోయిన డిస్ట్రిబ్యూషన్ ట్రాన్స్ ఫార్మర్ ను నిర్ణీత సమయంలో మరమ్మత్తులు చేసి వినియోగదారునికి మెరుగైన సేవలను అందించుటకు లైసెన్స్ ఎప్పటికప్పుడు సమీక్షించుకొని తదనుగుణంగా చర్యను చేపట్టడం జరుగుతున్నది..

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	<p>చేయగలిగే రిపేర్లను కూడా పూర్తిగా కాలిపోయినట్లు గా చూపించిబిల్లు లు క్లెయిమ్ చేస్తున్నారు దీనివలన ప్రజాధనం దుర్వినియోగం అవుతుంది. ప్రతీ సెక్షన్ లో TATA AC ను DTR ట్రాన్స్ఫార్మర్ నిమిత్తం అందుబాటులో ఉంచాలి.</p>	<p>కాలిపోయిన/ చెడిపోయిన DTR ను పట్టణ ప్రాంతాలలో 24 గంటలలోపు మరియు గ్రామీణ ప్రాంతాలలో 48 గంటలలోపు మార్పుటకు తగు చర్యలను తీసుకోవడం జరుగుతున్నది. డిస్కాం సిబ్బంది అందుబాటులో ఉంటూ ఎల్లవేళల మరియు అత్యవసర పరిస్థితులలో విదులు నిర్వహించడం జరుగుతున్నది.</p>
6.	<p>క్షేత్ర స్థాయిలో సిబ్బంది అయిన లైన్ మెన్ లను / హెల్పర్ల ఖాళీలను వెంటనే భర్తీ చేయాలి.</p>	<p>ప్రభుత్వ ఆదేశాల మేరకు సంస్థ వారు ఎప్పటికప్పుడు క్షేత్ర సిబ్బందిని నియమించడం జరుగుతున్నది.</p>
7.	<p>వ్యవసాయ వినియోగదారుల పైన గ్రామీణ గృహ వినియోగదారుల పైన క్షేత్ర స్థాయి సిబ్బంది బిల్లు లు వసూలు చేయడం కొరకు ఫీజులు తొలగించడం స్టార్టర్లు తీసుకుపోవడం సర్వీసు వైర్ తీసుకువెళ్ళి వ్యవసాయ పనులకు అంతరాయం కలిగిస్తున్నారు ఈ దౌర్జన్యాలను ఆపాలి. లక్షలాది రూపాయలు బకాయి ఉన్న వినియోగదారుల నుండి వసూలుకు తక్షణ చర్యలు గైకోనాలి.</p>	<p>వ్యవసాయ విద్యుత్ వినియోగదారులకు కస్టమర్ చార్జీలు మరియు గృహ వినియోగదారులకు ద్యుత్ బిల్లు లు పంపిణీ చేసిన తరువాతనే వసూలు చేయడం జరుగుతున్నది. విద్యుత్ కస్టమర్ చార్జీలు/బిల్లు లు చెల్లించని వినియోగదారునికి నిర్ణీత గడువు తదుపరి విద్యుత్ సరఫరా నిలిపివేయడం జరుగుతున్నది. విద్యుత్ బకాయిలు సకాలం లో చెల్లించి సంస్థకు సహకరించ గలరు.</p>
8.	<p>హైదరాబాద్ సాత్ సర్కిల్ లో 2013 సంవత్సరాలలో 47.55% నష్టంగా డిస్కాంలు వారు తెలిపారు. దీనిని తగ్గించడానికి తగు చర్యలు తీసుకుంటామని తెలిపినారు ప్రస్తుత నష్టం ఎంతో ఎంత నష్టాన్ని తగ్గించారు భవిష్యత్ లో ఏ చర్యలు తీసుకుంటారో తెలిపి నష్టాన్ని తగ్గించగలరు</p>	<p>లైసెన్స్ పరిధిలో లేని అంశము.</p>
9.	<p>టోల్ ఫ్రీ నెంబర్ ద్వారా ఏ జిల్లా లో ఎన్ని కంప్లెంట్స్ వచ్చినవిటోల్ ఫ్రీ నెం.1800 425 3600 మరియు 1800 425 0028 వినియోగదారులకు తెలియజేయడానికి చర్యలు గైకోనాలి. గతంలో ప్రతి</p>	<p>ఏ వినియోగదారుడైనా టోల్ ఫ్రీ నెంబర్ 18004250028 ద్వారా తమ ఫిర్యాదు నమోదు చేసుకోవచ్చు. దీని పై పత్రికల ద్వారా</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	<p>లైన్ మెన్ కు లీటర్ కలర్ డబ్బా - రెండు బ్రష్ లు డిస్కాం వారు ఇచ్చి హెల్పర్ తో ప్రతి గ్రామంలో బిల్లు వసూలు కేంద్రంలో మరియు ట్రాన్స్ ఫార్మర్ల పై టోల్ ప్రీ నెం. వ్రాయించడని మేము సలహా ఇచ్చాము, అటువంటి పని ఏమైనా జరిగిందా, భవిష్యత్తు లో నెంబర్ వ్రాసే చర్యలు ఏమైనా తీసుకుంటారో తెలుపగలరు. TSNPDCL వారు రైతు మిత్ర ఫోన్ నెంబర్లు జిల్లా వారిగా ఇచ్చారు తర్వాత ఆపివేశారు. రైతుమిత్ర వాహనం కుడా అందుబాటులోకి ఉన్నట్లు ఉంచి దానిని రద్దు చేశారు, అంటే రైతాంగానికి సమస్యలు లేకుండా చేశారా (లేదా) వీరి సమస్యలు పరిష్కరించ వలసిన బాధ్యతా మాకు లేదు అని ఆపివేశారా? అని కరీంనగర్ ఎస్.ఇ గారిని అడిగితే కార్తికేయ మిశ్రా, సి.ఎం. . గారు వెళ్లారు, ఆ సౌకర్యాలు కుడా వారితో వెళ్ళిపోయాయి అని వ్యగ్యంగా తెలిపారు. వ్యక్తులు మారితే వ్యవస్థ కుంటుపడుతుందా? ఇటువంటి వ్యవస్థ కుంటుపడకుండా తగిన చర్యలు తీసుకోగలరని కోరుచున్నాము. టోల్ ప్రీ నెంబర్ కు ఫోన్ చేస్తే వెంటనే ఫోన్ ఎత్తరు. ఎత్తితే ఈ నెంబర్ ఎవరు ఇచ్చారు? ఎ.ఈ. గారికి చెప్పండి అని అసంబంధమైన ప్రశ్నలు వేస్తారు 1800 425 0028 మరియు 1800 425 3600 కు వచ్చిన ఫిర్యాదులన్నిటికీ వారి ఫిర్యాదు సంఖ్య, తరువాత చర్యలు, ఫిర్యాదుదారుని సెల్ ఫోన్ కు మెసేజ్ ద్వారా సందేశాలు పంపించే ఏర్పాటు చేయాలని విద్యుత్ నియంత్రణ మండలి వారిని ప్రార్థిస్తున్నాము ఫిర్యాదును టోల్ ప్రీ నెంబర్ లో ఆటోమాటిక్ గా కాకుండా ఆపరేటర్ ద్వారా తీసుకోవాలి. వ్యవసాయదారులకు ఆటోమాటిక్ ద్వారా కంప్లెంట్ లు చేయడం సాధ్యం కావడం లేదు. సంబాషణలు రికార్డు అయ్యే ఏర్పాటు చేయాలి.</p>	<p>విస్తృత ప్రచారం చేయడమైనది. Toll Free No. విద్యుత్ బిల్లు పైన ముద్రించబడినది. నవంబర్ 2012 ప్రారంభమైననాటి నుండి ఇప్పటివరకు మొత్తం 1,50,304 ఫిర్యాదులు నమోదు చేయబడ్డాయి అన్ని ఫిర్యాదులను పరిశీలించి తగు సేవలందించడం జరిగినది. సత్వర సేవలను వినియోగదారులకు అందించడానికి గాను 1,118 సిమ్ కార్డులను లైన్ మెన్ స్థాయి వరకు ఇచ్చి ఈ నంబర్లను గ్రామ పంచాయితీ కార్యాలయాలలో ప్రదర్శించ బడినవి అలాగే వార్తా పత్రికలలో ప్రచురించబడినవి కాలిపోయిన DTRలను గ్రామీణ ప్రాంతాలలో 24 గంటలలో మార్చడం జరుగుచున్నది. ప్రతీ సబ్-డివిజన్ పరిధిలో ఒక వాహనాన్ని ఇందు మినితం ఏర్పాటు చేయడమైనది. సేవలలో జాప్యమైనచో ఇంకొక వాహనాన్ని తాత్కాలికంగా ఏర్పాటు చేసి సేవలందించడం జరుగుచున్నది.</p>
10.	<p>గ్రామీణ ప్రాంతాలలో గృహ మరియు ఇతర వినియోగదారుల కొరకు పట్టణాల్లో మాదిరిగా విద్యుత్ సరఫరా చేయాలి. గ్రామీణ ప్రాంత ప్రజలను రెండవ తరగతి ప్రజలుగా చూడరాదు.</p>	<p>విద్యుత్ డిమాండ్ సరఫరాల మధ్య వ్యత్యాసం ఎక్కువగా ఉన్నప్పుడు తప్పని సరి పరిస్థితుల్లో మాత్రమే విద్యుత్ కోత</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
		అమలు చేయడం జరుగుతున్నది.
11.	మాతృ భాష అమలు : మాతృ భాష అమలుకు తగిన చొరవ చూపించాలి. డిస్కాం వారు సరఫరా చేసే ARR లు ఇతరాలు మరియు విద్యుత్ నియంత్రణ మండలి వారు ఇచ్చే టారిఫ్ ఆర్డర్లను కుడా తెలుగులో ముద్రించి ఇవ్వాలని గతంలో కుడా తమరికి విన్నవించుకున్నాం. వెంటనే అమలుకు తగిన చొరవ చర్యలు తీసుకోవాల విద్యుత్ నియంత్రణ మండలిని ప్రార్థిస్తున్నాము	వార్షిక ఆదాయ ఆవశ్యకత, ధరల ప్రతిపాదనల సంగ్రహమును మరియు అర్జీ దారుని అభ్యంతరాలకు సమాధానాలు తెలుగులో అందించడం జరుగుతున్నది.
12.	విద్యుత్ ఉపకరణాలు, పంపిణీ సంస్థలు సరఫరా చేసేటివి వ్యవసాయానికి మరియు ఇతరములు వేర్వేరు రంగులు కొనుగోలు చేయాలి. వినియోగదారునికి సరఫరా చేసిన తర్వాత వినియోగ దారుని సంతకం తన సర్వీసు వద్ద ఏ మెటీరియల్ ఎంత వాడారు అని వినియోగ ధృవీకరణ పత్రం (Utilization Certificate from Consumer) తీసుకోవాలి. Inter polls, System Improvement సంబంధించిన మెటీరియల్ ఎక్కువగా దుర్వినియోగం అవుతుంది. దాని వలన సంస్థ మరియు వినియోగదారులు నష్టపోవడం జరుగుతున్నది.	సంవత్సరానికి సరిపడే విద్యుత్ పరికరాలను అంచనా వేసి కంపెనీ స్టాఫ్ లో ఒకే సారి కొనుగోలు చేయటం జరుగుతున్నది. ఇలా కొనుగోలు చేసిన పరికరాలలో ప్రాధాన్యత క్రమంలో వ్యవసాయానికి కుడా కేటాయింపులు ఉంటాయి.
13.	సాముహిక (Community) అవసరాల కొరకు వాడిన సామగ్రి కొరకు కనీసం ఆ ప్రాంత వినియోగదారుల ముగ్గురు సంతకం తీసుకున్న తర్వాత పని ముగిసినట్లు భావించాలి పారదర్శకంగా పనులు జరిగే ఏర్పాటుకు తగు చర్యలు గైకోనాలని తమరిని వినప్రంగా ప్రార్థిస్తున్నాం	విద్యుత్ పనుల కొరకు స్టోర్స్ నుండి తీసుకున్న సామగ్రి మరియు వాటి వాడకాన్ని ఉపయోగించుట SAP వ్యవస్థ ద్వారా పారదర్శకతతో పరిశీలించబడుచున్నది. ఏ రకమైన అసమతుల్యత ఉన్నట్లయితే సంబంధిత అధికారి పై క్రమ శిక్షణ చర్యలు తీసుకోవబడును.
14.	చెక్కర మిల్లు లు విద్యుత్ ఉత్పత్తికి దూరంగా ఉంటున్నాయి వారికి తగిన రేటు ఇచ్చి విద్యుత్ ఉత్పత్తికి ప్రోత్సహించాలి. రేటు ప్రస్తుత కొనుగోలు ధరలతో దాదాపు సరిపోయేటట్లు నిర్ణయించి	ఈ క్రింది బాగాస్సి సాంప్రదాయేతర విద్యుత్ ఉత్పత్తి సంస్థల నుండి విద్యుత్ ను కొనుగోలు చేయడం జరుగుతున్నది.

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	<p>కొనుగోలు చేయాలి. ఎన్ని చెక్కర మిల్లుల వద్ద ఎంత విద్యుత్ కొనుగోలు చేస్తున్నారు ఏ ధరకు కొంటున్నారు, భవిష్యత్తులో కొనుగోలుకు ఇంకా అవకాశం ఎంత ఉంది? స్కాం ద్వారా వివరాలు తెలుపమని, తదుపరి కొనుగోలు కొరకై తగిన చర్యలు గైకోనగలరని ప్రార్థిస్తున్నాం</p>	<p>1. NCS Sugars Ltd., నిజామాబాద్. 2. కాకతీయ సిమెంట్, సుగర్స్ & ఇండస్ట్రీస్ Ltd., ఖమ్మం 3. నిజాం డక్కన్ సుగర్స్ Ltd., నిజామాబాద్. 4. GSR సుగర్స్ Ltd., నిజామాబాద్ 2013-14 సంవత్సరంలో పై సాంప్రదాయేతర విద్యుత్ ఉత్పత్తి కేంద్రాల నుండి 113 MU ను యూనిట్ కు సరాసరి రూ.3.15 చొప్పున విద్యుత్ కొనుగోలు చేయడం జరిగినది. 2015-16 సంవత్సరంలో పై విద్యుత్ ఉత్పత్తి కేంద్రాల నుండి 105 MU విద్యుత్ కొనుగోలుకు అందుబాటులో ఉంటుందని అంచనా వేయడం జరిగినది.</p>
15.	<p>స్వల్పకాలిక విద్యుత్ కొనుగోలు వల్ల వినియోగదారుల పై ఎక్కువ భారం పడుతుంది. ధీర్ఘకాలిక కొనుగోలు ఒప్పందాల వల్ల భారం తగ్గుతుంది కావున స్వల్పకాలిక ఒప్పందాల కొనుగోలుకు 5% కన్నా మించకుండా ఉండేటట్లుగా తగిన చర్యలు గైకోనాలని ప్రార్థిస్తున్నాం</p>	<p>సాధ్యమైనంత వరకు ధీర్ఘకాలిక విద్యుత్ కొనుగోలు ఒప్పందం విద్యుత్ కొనుగోలు చేయడం జరుగుతున్నది. విద్యుత్ లోటును అధిగమించడానికి తప్పని పరిస్థితుల్లో స్వల్పకాలిక విద్యుత్ ను కొనుగోలు చేయడం జరుగుతున్నది.</p>
16.	<p>CGRF లో కన్స్యూమర్ నెంబర్ ఒకరు, ముగ్గురు స్కాం అధికారులుగా ఉంటున్నారు. చాలా సందర్భాలలో స్కాం లకు లాభం చేయడానికి వినియోగదారునికి అన్యాయం చేయడం జరుగుతున్నది. కావున స్కాం అధికారుల ప్రభావం తగ్గి వినియోగదారునికి న్యాయం చేకుర్చు నికై ఒక జ్యూడిషియల్ మెంబర్ ఒక వినియోగదారుని సభ్యుని ఇద్దరినీ డిస్కాం అధికారులను నియమించాలని కోరుచున్నాము.</p>	<p>లైసెన్స్ పరిధిలో లేని అంశము.</p>

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17.	<p>మహబూబ్ నగర్ జిల్లా కొల్లా పూర్వసి మద్దిరేటి డిస్కాం సేవా లోపం పైన తగిన చర్యలు తీసుకోవాలని CGRF ను ఆశ్రయించారు. CGRF వారు సేవాలోపం జరిగింది. మద్దిరేట్ కి సేవాలోపం క్రింద రూ.1,50,000/- లు చెల్లించడని తీర్పు ఇస్తే సిబ్బంది అడిగితే స్థానికవ్యక్తులను ఆశ్రయించి ఆ రైతు పై ఒత్తిడి తీసుకు వచ్చి అతి కొద్ది మొత్తం నగదును ఇచ్చి మొత్తం డబ్బులు ముట్టినది అని రసీదు తెచ్చారు. కరీంనగర్ జిల్లాలో CGRF వారు వేసిన పెనాల్టీ నాకు అవసరం లేదని వ్రాయించుకొచ్చారు. ఇటువంటి అక్రమాలు జరగకుండా అట్టి అపరాధ రుసుమును CGRF ద్వారా వినియోగదారునికి చెక్ రూపంలోనే ఇప్పించే ఏర్పాటు చేయాలని ప్రార్థిస్తున్నాము</p>	<p>లైసెన్సీ పరిధిలో లేని అంశము.</p>
18.	<p>CGRF పైన వినియోగదారుల అవగాహన లేదు. దీని గురించి ప్రచారము సరిగా లేదు. ప్రతి బిల్ వెనుక తెలుగులో CGRF సౌకర్యము సేవల గురించి ప్రచురించాలి.</p>	<p>విద్యుత్ వినియోగదారుల పరిష్కార వేదికలు ప్రతి నెల డిస్కాం పరిధిలో నిర్వహించబడుచున్నవి. విద్యుత్ పరిష్కార వేదికల నిర్వహణ తేదీలను తెలియ పరచుటకు మరియు CGRF ల పై అవగాహన పెంపొందించుటకు వివిధ ప్రసార మాధ్యమ ద్వారా వినియోగదారులకు తెలియచేయడం జరుగుతున్నది. వినియోగదారుల దినోత్సవమును CGRF ఆధ్వర్యంలో నిర్వహిస్తూ విద్యుత్ వినియోగదారుల సమస్యలు విద్యుత్ పొదుపు మరియు విద్యుత్ ప్రమాదాల నివారణ మొదలైన వాటి పై అవగాహన పెంపొందించడం జరుగుతున్నది.</p>
19.	<p>మెడక్ జిల్లాలో గ్రామం మండలం కమ్యూనిటీ బావులకు సంబంధించి సర్వీసు ఛార్జ్ రూ.30/- చొప్పున 4,300 రూ.లు చెల్లించాలని చెప్పారు. లై కండక్టర్ ను కొన్ని చోట్ల స్తంభాలను కూడా డిస్కాం వారు వేరే చోట వాడడానికి తీసుకు వెళ్ళారు. అని పలు మార్లు బిల్లు వసూలుకు వచ్చిన</p>	<p>లైసెన్సీ పరిధిలో లేని అంశము.</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	సిబ్బందికి తెలిపాడు. అయినా అతనికి సంబంధించిన గృహ విద్యుత్ కనెక్షన్ ను తొలగించారు. 20 సంవత్సరాల నుండి ఉపయోగంలో లేని కనీసం లైన్ కూడా దానికి బిల్లు వసూలు చేస్తున్నారు	
20.	నల్గొండజిల్లా లో CGRF వారి వద్దకు ఒక వినియోగదారుడు వచ్చి నా స్వంత ప్లాట్ (రెసిడెన్షియల్) లో DTR వేసారు. దానిని తీయించడానికి కోర్టుకు వెళ్లి డీకీ తీసుకు వచ్చాను. దానిని డిస్కాం వారు ఇంప్లి మెంట్ చేయలేదు డీకీ ని ఇంప్లి మెంట్ చేయాలని CGRF వద్దకు వస్తే CGRF వారు కూడా డీకీ అమలు చేయాలని ఆర్డర్ ఇచ్చారు. అయినా అమలు చేయలేదు. సంబధిత వినియోగదారుడు కాంట్రాక్టర్ కు రూ.20,000/- ఇచ్చి పని చేయించుకున్నారు. ఇటువంటి తప్పలకు బాధ్యతా రాహిత్యానికి ఎవరిని బాధ్యులు చేయాలి? ఎలాంటి చర్యలు తీసుకోవాలి తెలపాలి. TSERC వారు స్పష్టంగా కఠిన చర్యల కొరకు ఉపపక్రమించాలి.	లైసెన్స్ పరిధిలో లేని అంశము.
21.	పట్టణాలలో అపార్ట్ మెంట్లలో కామన్ మీటర్ కు సంబంధించి వినియోగదారులు ఎక్కువ మంది ఉంటారు. ఒక అపార్టుమెంట్లో 20 ప్లాట్స్ ఉంటే మీటర్ రీడింగ్ వినియోగం ఎంత ఉంటే అంతలో 20 భాగాలుగా వాడుకున్నట్లు అవుతుంది కానీ రెడింగ్ నమోదు 20 మందికి ఒకే చోట వినియోగం రికార్డు అవుతుంది. కావున ఎక్కువ ప్లాన్ లోకి వెళ్తుంది నికి ఎంత ఎక్కువ అతి రేటు వర్తిస్తుంది ఇది భారంగా ఉంటుంది. నీటి వినియోగం విషయంలో అపార్టుమెంట్లకు వేరే టారిఫ్స్ ఉంది. అన్ని పట్టణాల్లో ని మధ్య తరగతి ప్రజలకు భారం ఉండకుండా నికి ప్రత్యేకమైన టారిఫ్స్ లు అమలు చేయాలని ప్రార్థిస్తున్నాం	గౌరవ కమీషన్ వారి పరిధిలోని అంశం.
22.	నర్సరీ విషయంలో రూరల్ హార్టీ కల్చర్ నర్సరీ అని పదం ఆంధ్ర లాబీయిస్టులు చేర్చించినారు హైదరాబాద్ పరిసరాల్లో ఉండే నర్సరీలకు వర్తించకూడదని ఇట్టి కుట్ర వేసినారు దాని హార్టీ కల్చర్ నర్సరీ అని మార్చాలి. రూరల్ అనే పదం తీసివేయాలని ప్రార్థిస్తున్నాము	గౌరవ కమీషన్ వారి పరిధిలోని అంశం.

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
23.	<p>మంచినీటి శుద్ధి మరియు సరఫరా కేంద్రాలను క్యాటగిరి-3 నుండి క్యాటగిరి-2 కు ERC అనుమతి తీసుకోవడానికి డిస్కాం లు మార్చారు. ప్రతి ప్రాణి గాలి తర్వాత అవసరైన నీటి విషయంలో క్యాటగిరికి మార్చి త్రాగునీటి భారం పెంచడం, నికి సబ్సిడీ రేటు నిర్ణయించాలని ప్రార్థిస్తున్నాను</p>	<p>కమీషన్ వారు ఆమోదించిన టారిఫ్ ఆర్డర్ నందు పేర్కొనబడిన ఎల్.టి-III కేటగిరి నిర్వచనం ప్రకారం RO ప్లాంట్స్ ఎల్.టి-III కేటగిరి నందు పరిగణించబడదు మరియు ఇది ఏ ఇతర కేటగిరి లకు సంబంధించినది కాకపోవడం వలన ఎల్.టి కేటగిరి-II గా పరిగణించబడుతున్నది. అయినప్పటికీని, కేటగిరి నిర్ణయించు అంశం గౌరవనీయ కమీషన్ వారి పరిధిలో కలదు.</p>
24.	<p>స్థానికంగా ఉన్న కాంట్రాక్టర్ లు హేల్పర్లు / గిల్పర్లు ఎండిపోయిన బావుల వద్ద నుండి కండక్టర్ ను పోల్స్ ను సేకరించి వేరే అవసరాల కొరకు వచ్చిన వినియోగదారులకు అమ్ముకుంటున్నారు. ప్రజలు గుర్తించి కంప్లైంట్ చేస్తే దొంగ తనం జరిగినట్లు పోలీస్ కంప్లైంట్ చేసి ఉన్న తాధికారులు వారికి వత్తా సు పాడి కాపాడుకుంటున్నారు అగ్రి కల్చర్ కనెక్షన్ ల కొరకు డి. .లు కడతామని హేల్పర్లు/గిల్పర్లు డబ్బు రూపేణా లేదా డి. . రూపేణా తీసుకోని డిస్కాం ఆఫీసులలో జమ చేయక సంవత్సరాల తరబడి వారి వద్దనే ఉంచుకొని వినియోగదారులను మభ్యపెడుతున్నారు. నియంత్రించాలి.</p>	<p>ఒకసారి లైన్ కానీ ట్రాన్స్ ఫార్మర్ కానీ వేసిన తరువాత ఎవరైనా వాటిని డిపార్టుమెంటు అనుమతి లేకుండా తొలగించుటకు వీలులేదు. ఇటువంటి సంఘటనలు డిపార్టుమెంటు దృష్టికి వస్తే చట్టరీత్యా తగు చర్యలు తీసుకోవబడును. డిపార్టుమెంటు వ్యక్తులకు ఎట్టి పరిస్థితులలో డబ్బు రూపేణ ఇవ్వరాదు. కేవలం DD రూపంలో తగినంత రుసుము చెల్లించి సంబంధిత విద్యుత్ సహాయక ఇంజనీర్ కార్యాలయంలో ఇచ్చి రసీదు పొందవలెను. ఈ విషయం గురించి వినియోగదారులలో అవగాహన గురించి విస్తృత ప్రచారం చేయుట జరుగుతున్నది.</p>

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

well as the Commission in such a short time. While the public hearings will be over by 14th March the Commission is expected to come out with the Tariff Order by 23rd March, after due consultation with the Government of Telangana State regarding the quantum of subsidy available, for the new tariffs to be applicable from 1st April. Under such unseemly haste it is doubtful whether the Commission will be able to do justice to the sector in general and also balance interests of all stakeholders in the sector.

However, the time given by the Hon'ble Commission is almost 1month which is reasonably sufficient to respond on the claims of the Discoms.

Further any delay in issuing the tariff order will cause loss of revenue to the Discoms; the hon commission is requested to issue the order such that the new tariff will be effected from April 1st 2015.

3. **3.1.1** According to the provisions of the Andhra Pradesh Reorganisation Act, 2014 Telangana State and residuary state of Andhra Pradesh have to share power generated by power plants located in both the states. An examination of the ARR and Tariff filings of TSDISCOMs and APDISCOMS shows that there is no common understanding between the two states in sharing the power generated in both the states. In fact differences and its impact are substantial. The following table summarises these differences:

Issue	Telangana State DISCOMs	Andhra Pradesh DISCOMs
APGENC O thermal units – DSTPP	Claimed 53.89% power	Claimed 100% power
TSGENC O units – KTPP II	Claimed 53.89% power	Did not claim any power
Inter state Hydel units	Claimed 41.68% (population percentage) citing provisions of AP Reorganisation Act.	Claimed 100% power
GENCO Hydel units	Claimed 53.89% from units located in AP as well as Telangana	Claimed 100% power from hydel units located in AP and did not claim power from units located in Telangana

- In accordance with the Clause C (2) of schedule XII of the AP Reorganization Act and as per G.O.Ms.No.20, DT: 08.05.2014, the allocation of power generated from the existing and the ongoing power plants located in both the states should be in the ratio of 53.89% & 46.11% respectively for Telangana and Andhra Pradesh.

- Government of Telangana on behalf of TSDISCOMs have already submitted its views on the sharing of the power from both the Central Generating Stations and as well as the State owned Power Generating stations located in AP & Telangana states, before the Committee constituted by MoP, Govt of India, under the chairmanship of Chairperson/CEA, to resolve the issues cropped up post state bifurcation between the TSDISCOMs and APDISCOMs. Decision of the Committee is awaited.

	Central Generating Stations	Claimed 52.11% instead of 53.89% citing draft recommendations of CEA	Claimed 46.11%		
	IPPs - Hinduja	Claimed 53.89% power	Claimed 100% power		
	NCE - Wind	Claimed power from wind energy plants located in Anantapur and Kurnool districts of AP	Claimed 100% power		
	<p>3.1.2 DISCOMs of both the states differ on total quantum of power available from each plant. For e.g., according to TSDISCOMs estimate power available from Dr NTTPS units I, II and III will be about 8,057 Mu and according to APDISCOMs it will be about 7,554 MU. Similarly, DISCOMs of both the states also differ on estimation of fixed cost burden from each plant.</p>				
4.	<p>3.1.3 TSDISCOMs in their filings submitted that generation tariffs based on the Generation Regulation are yet to be determined. This is particularly the case with state owned GENCOs. In the background of AP Reorganisation Act, 2014 the question arises as to who will determine the tariff for GENCO power plants? If it is the SERCs which determine tariffs then the next question will be which SERC will determine which plant's tariff. If the role devolves on CERC as the plants become inter state plants one would like to know the steps taken by the GENCOs as well as DISCOMs in getting CERC's approval for PPAs for these plants. Similar questions also arise in the case of tariff determination for HNPCL plant at Visakhapatnam and APPDC's DSTPP at Krishnapatnam.</p>			<p>Telangana discoms will take appropriate steps as per the AP Re Organization act.</p>	
5.	<p>3.1.4 Even when the Chief Minister of Telangana state is saying that the state has to endure power shortages for the next three years TSDISCOMs filings show that the state will have 8,150 MU of surplus power at its disposal. Similarly, according to APDISCOMs' filings AP will have 11,000 MU of surplus power. This anomalous situation arises due to the above differences in views related to power sharing and consequent estimation of power availability.</p>			<p>TSDISCOMS have projected the energy availability from various energy sources as per the AP Reorganization Act and as per best estimates of parameters like coal availability, maintenance schedules, PLF etc. from existing stations as well as upcoming stations of Andhra Pradesh like Krishnapatnam, Hinduja etc.</p>	

		If these stations achieve CoD as per the projection of ARR and share power with Telangana as per AP Re organization Act, this would result in the Energy surplus scenario as projected in the ARR
6.	<p>3.1.5 Without settling these issues it will not be possible to estimates the costs in supplying power to the consumers in both the states and also determine tariffs. One way to solve this is for the ERCs of AP and TS sit together evolve a mechanism. But the outcome from such exercise may not be acceptable to some on either side of the dispute. Another way is for the two state governments solve this through discussions. Under the present circumstances it may not be possible. Under the AP Reorganisation Act the central government has powers to arbitrate in the disputes between the two states and give directions. Part of this work is already done through a draft report submitted by CEA. TSERC may write to the Government of India to settle this issue preferably well before the Commission comes out with the tariff order for the ensuing year.</p>	It is not under purview of Licensee
7.	<p><u>Why energy from IPPs not considered after PPA term?</u></p> <p>3.2.1 DISCOMs estimated power availability from GVK plant up to June 2015 and from Lanco up to December 2015 due to expiry of PPAs with these power developers. Due to this TSDISCOMs will be losing about 580 MU power. As the gas allocation to these plants continues and these plants continue to generate power TSDISCOMs shall get their share of power from these plants after the above dates also.</p> <p>3.2.2 At the same time we also would like to know the steps taken by the TSDISCOMs to extend these PPAs or take over these plants on completion of PPA terms.</p> <p>3.3 Also, in the background of additional power to the extent of 450 MW being made available to both the states combined together from gas based power plants (TS share expected to be</p>	<p>TSDISCOMS have considered energy availability from gas based IPPS only till the PPA expiry date. Considering the low gas availability which has forced the IPPS to run at PLFs as low as 20%, Considering that long term sources are being planned in Telangana by TSGENCO and SCCL which are expected to be cheaper sources and higher cost of power generation from gas IPPs, TSDISCOMS have not considered energy availability from these stations</p> <p>TSPCC is making arrangement towards additional generation with RLNG (by way of swapping with KG D6 gas) and also with Naptha. TSPCC appraised the Gol about the power deficit that is being faced by the Telangana state and requested for allotment of 5 MMSCMD RLNG (under swapping arrangement with KG D6 gas) for additonla generation of 1000 MW. The Gol and</p>

	<p>242 MW) following change in gas allocation policy of Gol, whereby some of the gas allocated to fertiliser plants being diverted to gas based power plants in AP, and additional power being available during summer shall be taken in to account while computing total power available to the state.</p> <p>3.4 Newspaper reports indicate that TSDISCOMs are planning to generate power from the gas based power plants using LNG/Naphtha. But the same does not appear in the present filings. DISCOMs are requested to clarify on quantum of power proposed to be generated using these fuels and its implication for cost of power procurement.</p>	<p>Minsitry of Fertilisers accepted to swap 2.4 MMSCMD of gas with RLNG which will generate 450 MW approx.. out of which TSDiscoms share will be around 240 MW. Similarly TSDiscoms are making arrangements to fire Naptha as alternate fuel by issuing dispatch instructions to IPPs like Spectrum Power generation Ltd., Lanco kondapalli power ltd., and GVK industries ltd. (GVK stage-I) depending upon the grid constraints for an additional generation of 250 MW (for TSDiscoms only)</p>
<p>9.</p>	<p>Power purchase costs – fixed costs</p> <p>4.2.1 Draft PPAs of KTPS VI, KTPP I and KTPP II units of TSGENCO are pending before the Commission since 2009. Delay in disposing petitions related to these PPAs is one of the reasons for the prevailing confusion in allocation of plants between AP and Telangana. It is high time the Commission finalises them through public process.</p>	<p>Not in purview of discom</p>
<p>10.</p>	<p>4.2.2 Hinduja National Power Corporation Limited was selected in 1990s under fast track projects. PPA with it was entered in to by erstwhile APSEB in 1998. It was provided with sovereign guarantee. Along with this conditions were also laid that its cost shall be equal to NTPC's Simhadri unit II. As there was inordinate delay in setting up the project even after fuel linkage liquidated damages shall be collected form it as provided under the 1998 PPA. Reports indicate that changes are being made in this PPA. The same shall be examined through public hearings.</p>	<p>MoA was entered on 17-05-2013 by the erstwhile APDISCOMs with M/s HNPCL for entering amendments to the existing PPA in line with the Regulations and EA2003. As per the MoA , the Draft amendments are prepared by the both parties and discussed during the meetings with M/s HNPCL. The proposed amendments are sent to M/s HNPCL for their comments. After finalization of the draft amendments, same will be submitted to ERC for approval.</p>

11.	<p>Fixed costs of GENCO plants Capital Costs of GENCO New Plants, (Rs/U)</p> <table border="1" data-bbox="264 261 716 509"> <thead> <tr> <th>Station</th> <th>Capacity MW</th> <th>Fixed Cost</th> </tr> </thead> <tbody> <tr> <td>KTPS VI</td> <td>500</td> <td>1.79</td> </tr> <tr> <td>KTPP I</td> <td>500</td> <td>1.79</td> </tr> <tr> <td>KTPP II</td> <td>600</td> <td>2.25</td> </tr> <tr> <td>UMPP – Mundra</td> <td>4000</td> <td>0.98</td> </tr> </tbody> </table> <p>4.2.3 Several new thermal power plants are in operation in the state. These include KTPS – VI, KTPP – I, and KTPP – II. In the above table except the last one all other plants are set up by TSGENCO. Though they are already in operation PPAs with them are not yet cleared by the Commission. They are pending before the Commission for more than four years. Even then the Commission is allowing the DISCOMs to procure power from these plants. Moreover DISCOMs in their filings are claiming that they are adopting fixed costs as approved by the Commission. According to the norms/regulations in operation after the enactment of power sector reform Acts both at state and central level at the first stage PPA between the generating company and distribution licensee shall be approved by the Commission followed by financial closure. After this erection of plant and machinery starts and COD needs to be declared before the distribution licensee starts receiving power from the generating station. All these steps are skipped in the case of the new GENCO plants. Though the draft PPAs are with the Commission for more than four years the Commission could not find time to examine these PPAs.</p>	Station	Capacity MW	Fixed Cost	KTPS VI	500	1.79	KTPP I	500	1.79	KTPP II	600	2.25	UMPP – Mundra	4000	0.98	Not in purview of discom
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12.	<p>4.2.4 Fixed costs of these new thermal power plants are high. Compared to the Ultra Mega Power Plant at Mundra in Gujarat set up by Tatas and which started power generation the fixed costs of the above plants proved to be very high. The fixed costs of these plants are higher by more than 75% to 100%.</p>	UMPP from economies of scale and tax benefits tend to have a lower cost per unit. Also Fixed cost per unit changes every year with increase in O&M expenses, reduction in loan amount, reduction in interest cost. Hence, the Fixed cost of new stations coming up in Telangana & AP cannot be compared to UMPP.															

<p>14.</p>	<p>Variable/Fuel cost</p> <p>4.3.1 DISCOMs propose to adopt variable cost escalation of 2%. In case there is any change in fuel prices during the ensuing year the same may be addressed through the existing regulation or Fuel Surcharge Adjustment (FSA) may be reintroduced. There is no need to adopt the proposed variable cost escalation.</p> <p>4.3.2 Variable cost of power from Hinduja National Power Corporation Limited's plant is estimated to be Rs. 1.86 per unit. Compared to this variable cost of power from NTPC's Simhadri units is estimated to be Rs. 2.60 per unit. While source of fuel (coal) for both the plants is the same (Mahanadi Coal Fields) NTPC's units' variable cost is higher by nearly 40%. This needs to be looked in to.</p> <p>4.3.3 Variable cost of KTPS VI unit (Rs.2.73 per unit) is higher than other units located at Kothagudem. This is because of allocation of coal from Mahanadi Coal Fields rather than from Singareni units. As swapping/rationalisation of coal allocation is in operation KTPS VI unit shall also get its fuel from Singareni units. This will help to bring down cost of power from this unit.</p>	<p>1. It is to be noted all thermal stations run predominantly on thermal coal supplied from domestic sources like MCL, SCCL etc. while imported coal is been used only in case of domestic coal shortfall.</p> <p>With increase in rail freight rates for coal by 6.3% and increase in green cess to Rs. 200 per metric tonne, the cost of coal is expected to increase significantly which would increase the variable cost of production</p> <p>Still, TSDISCOMS have taken a conservative estimate and projected the increase in variable cost only by 2%. TSDISCOMS request Hon'ble Commission to consider this nominal escalation</p> <p>2. Variable cost of plant depends on the coal mine from which coal is tapped, transportation charges which might include rail, road, seafreight charges. Additionally, factors like efficiency of the power plant, consumption of secondary oil, washing of coal would impact the variable cost of power production. Hence, even though the power plants are located at the same venue, it need not be necessary that the variable cost is same</p> <p>The Variable Cost of Simhadri STPS is considerably high when compared to the Variable Cost of HNPCL as 40 % of required Coal is being imported for the Simhadri STPS.</p> <p>The NTPC is using 60 % of indigenous Coal and 40% of imported Coal for the Simhadri Super Thermal Power Station in view of the shortage of indigenous Coal.</p> <p>The HNPCL has yet to start generation and Variable Cost arrived by HNPCL is based on 100 % of indigenous Coal</p>
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		Originally KTPS-Vi stage is totally linked to Ms Mahanadi coal fields Ltd. To an extent of 2.31 million tonnes per annum. Ministry of Coal, Gol has swapped the coal linkage from MCL to SCCL. Fuel supply agreement will be entered with the SCCL for supply of Coal to this unit.															
15.	<p>4.3.4 Use of imported coal continues to be source of concern, both in terms of price as well as quality. Following objections raised by the public during public hearings the Commission has given several directions in the case of utilisation of imported coal by central generating stations as well as APGENCO units. TSDISCOMs in their replies in response to these directions merely mentioned that TSGENCO plants would not be using imported coal. Under the provisions of the AP Reorganisation Act TSDISCOMs also will be accessing power from CGS and APGENCO thermal units which are using imported coal. In this regard TSDICOMs also need to pay attentions to the directives issued by the Commission related to utilisation of imported coal.</p>	TSDISCOMS would adhere to the directives issued by the Hon'ble Commission															
17.	<p>4.3.6 One of the important reasons for increase in power purchase costs is hike in natural gas price by the central government. Price of natural gas increased from \$ 4.2 per MBTU to \$ 5.61 per MBTU. Following this variable cost of power produced from gas based power plants increased.</p> <p>Variable Cost Rs/U</p> <table border="1" data-bbox="264 1057 741 1305"> <thead> <tr> <th>Plant</th> <th>2013-14</th> <th>2015-16</th> </tr> </thead> <tbody> <tr> <td>GVK</td> <td>2.19</td> <td>2.62</td> </tr> <tr> <td>Spectrum</td> <td>2.48</td> <td>2.76</td> </tr> <tr> <td>Lanco</td> <td>2.25</td> <td>3.02</td> </tr> <tr> <td>Reliance</td> <td>1.64</td> <td>3.44</td> </tr> </tbody> </table>	Plant	2013-14	2015-16	GVK	2.19	2.62	Spectrum	2.48	2.76	Lanco	2.25	3.02	Reliance	1.64	3.44	Noted
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18.	<p>4.3.7 The new natural gas price adopted by the Gol goes against the norms of price fixation, against the PSC and also orders of the Supreme Court. This shall not be allowed. As the consumers of Andhra Pradesh will be severely adversely affected by this DISCOMs and GoAP/GOTS should have taken initiative to see that this price is rolled back. These should have explored all avenues to bring down this price, including approaching the Supreme Court. As variable costs are pass through DISCOMs are least bothered about this burden on the consumers. In the meantime E.A.S Sarma, former Secretary, Gol and Gurudas Dasgupta filed a petition in Supreme Court challenging the above gas price. We request the TSDISCOMs and the GoTS to implead in this case before the Supreme Court. This request is not a misguided one given the APERC's observations in its Order on GVK that DISCOMs will take care of consumers' interests.</p>	Noted
19.	<p><u>How short term purchases are made without regulatory approval?</u></p> <p>4.4 During the FY 2014-15 TSDISCOMs procured 8,713 MU through short term/market purchases constituting nearly 18% of the power procured in the state. Most of this power is procured without regulatory approval and in a non-transparent manner. Even when additional demand was only during peak period power through short term purchases was procured under round the clock (RTC) terms. Because of this during non-peak periods in order to accommodate short term purchases made under RTC terms cheaper GENCO plants were being backed down. This led to unnecessary burden on TSDISCOMs and in turn on consumers in the state. TSDISCOMs as the filings show will be procuring power through short term purchases during 2015-16. Also, state leadership is exhorting DISCOM officials to procure power at any cost. Keeping past experience in mind short term purchases shall be made in an optimum manner, specifically to meet peak deficits, but not on RTC terms.</p>	During FY 14-15, energy requirement has been significantly higher than the energy availability. Also due to a bad monsoon year, Hydel energy availability has significantly reduced. To fulfil the promise of providing 7 hours of supply to Agriculture consumers, TSDISCOMS had to resort to power purchase from Short term sources

20.	<p>5.1 Financial Restructuring Plan (FRP) is introduced by the Gol in the name of ensuring the financial viability of the DISCOMs. Though introduced by it the Gol does not take any financial responsibility of ensuring the financial viability of the DISCOMs. According to this Plan the state government will stand guarantee to the bonds issued to cover 50% of the accumulated losses. From DISCOMs' filing it is not clear whether the State Government will repay the bonds or DISCOMs have to pay them and in case of their default only the State Government will come in to the picture. Apart from this, the bonds issued by the state government covers only 40% of the accumulated losses, not 50%as envisaged in the Plan.</p>	<p>The State Govt is required to take over 50 % of the outstanding short term liabilities (STL) corresponding to the accumulated loss as per audited accounts of the DISCOMs as of March 2013 , the cutoff date for implementation of FRP in combined State .</p> <p>Initially Bonds are issued by the DISCOMs and GoTS will take over the bonds in two to five years depending upon its fiscal space.</p> <p>DISCOMs are taking up the issue of taking over the bonds by GoTS.</p> <p>Interest and repayments of bonds is the liability of GoTS. Further, GoTS has already paid Rs227 Crs interest on bonds relating to first half of FY2014-15.</p>																		
21.	<p>5.2 According to the TSDISCOMs' filings the remaining 60% losses need to be structured as loans with a three moratorium for paying principal amount. The two DISCOMs propose to convert losses to the extent of Rs. 2,450 crore in to short term loans, constituting only 40% of their burden. Then, what will happen to the remaining 60% of their loss burden?</p>	<p>The details of losses and contribution of each components is already enclosed in the Director's Report of the company Annual accounts 2012-13 which is again reproduced below .</p> <p style="text-align: center;">TSNPDCL For FY 2012-13</p> <table border="1" data-bbox="1192 922 1759 1287"> <thead> <tr> <th>Particulars</th> <th>Rs. In Crores</th> </tr> </thead> <tbody> <tr> <td>Government receivables</td> <td>2,050.89</td> </tr> <tr> <td>Power purchase cost</td> <td>867.07</td> </tr> <tr> <td>Revenue from sale of power</td> <td>239.05</td> </tr> <tr> <td>Other expenses</td> <td>189.76</td> </tr> <tr> <td>Finance cost</td> <td>109.52</td> </tr> <tr> <td>Employee cost</td> <td>87.65</td> </tr> <tr> <td>Revenue from sale of power</td> <td>85.3</td> </tr> <tr> <td>Trade receivables</td> <td>9.72</td> </tr> </tbody> </table> <p>DISCOMs have raised STL to meet expensive power purchase cost, increase in power purchase cost due to inflation and cost associated delayed collection of FSA etc .</p>	Particulars	Rs. In Crores	Government receivables	2,050.89	Power purchase cost	867.07	Revenue from sale of power	239.05	Other expenses	189.76	Finance cost	109.52	Employee cost	87.65	Revenue from sale of power	85.3	Trade receivables	9.72
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		<p>The GoAP/GoTS had agreed to take over their commitment towards expensive power purchase.</p> <p>Accordingly,50% of STL will be taken over by GoTS as per scheme and balance 50% of STL is due to the</p> <p>1) Restriction of T&D losses to the extent of approved losses while approving FSA ,</p> <p>2) restriction of agriculture consumption to the extent of approved quantity in the T.O in the FSA orders Eventually led to Difference of FSA between filed and approved by the Hon'ble APERC for the FY 2011 to 2013. The scheme basically meant to make DISCOMs financially viable and to restructured the short term loans and GOI proposed that, the 50% of STL shall be issued in the form of bonds to Banks. The bonds will be repaid by GoTS along with interest.</p> <p>The scheme proposes to restructure the balance of Short terms Loans to the extent of 50% of Short term loans outstanding as on 31-03-2013. The interest and repayment of restructured loans will be the commitments of DISCOMs.</p>																		
22.	<p>5.3 TSDICOMs submitted, “The key components of above losses are unapproved portion of Fuel Surcharge Adjustment (FSA) for the years 2009-10 to 2011-12, FSA cases pending in courts and Govt receivables over and above Rs. 4,553.85 Crs which is agreed by Govt as final settlement”. Apart from the DISCOMs did not provide any details on the sources of these accumulated losses. Unapproved FSA amounts cannot be recovered without sanction from the TSERC and the Courts in question. Again in the case of TSERC, it cannot approve the pending FSAs without following the public process as mandated by the High Court in earlier cases. The above passage also mentions Govt receivables. From this it is not clear whether these are receivable by Govt from DISCOMs or by DISCOMs from Govt. In fact it should be receivables by DISCOMs from Govt. In the past the state government directed the DISCOMs</p>	<p>The details of statement of losses depicting and contribution of each components are as follows.</p> <p style="text-align: center;">TSNPDCL For FY 2012-13</p> <table border="1" data-bbox="1192 1060 1759 1425"> <thead> <tr> <th>Particulars</th> <th>Rs. In Crores</th> </tr> </thead> <tbody> <tr> <td>Government receivables</td> <td>2,050.89</td> </tr> <tr> <td>Power purchase cost</td> <td>867.07</td> </tr> <tr> <td>Revenue from sale of power</td> <td>239.05</td> </tr> <tr> <td>Other expenses</td> <td>189.76</td> </tr> <tr> <td>Finance cost</td> <td>109.52</td> </tr> <tr> <td>Employee cost</td> <td>87.65</td> </tr> <tr> <td>Revenue from sale of power</td> <td>85.3</td> </tr> <tr> <td>Trade receivables</td> <td>9.72</td> </tr> </tbody> </table>	Particulars	Rs. In Crores	Government receivables	2,050.89	Power purchase cost	867.07	Revenue from sale of power	239.05	Other expenses	189.76	Finance cost	109.52	Employee cost	87.65	Revenue from sale of power	85.3	Trade receivables	9.72
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	<p>to purchase power from market at high prices assuring that it will bear higher the expenditure. The DISCOMS also mentioned," The bonds issued cover the expensive power purchased by the TS DISCOMS for the period 2008-09 to 2013-14." (p.50 SPDCL Filing) After that it reneged on its assurance. According to the MYT framework surplus/deficit need to be analysed at the end of the control period in detail before approving the same. But it was not done in the case of first as well as second control periods. In the background of the above we request the Commission not to approve the above interest cost and direct the DISCOMS to make all information related to the above public.</p>	<p>Since, the discoms are claiming the interest on STL restructured loans which is the part of FRP scheme, the restructured loan is the liability of DISCOMS as per scheme and the DISCOMS can only pay the debt service on the restructure loans through ARR .There is no additional resources to meet the debt servicing cost of DISCOMS.</p> <p>DISCOMS are only claiming interest and will claim the repayments of EMI from the beginning of 4th year of FRP implementation. the soft copy of FRP scheme approved by the GoAP can be shared with hon'ble objectors as desired by them .</p>
23.	<p>6.1 TSDISCOMS claim Rs. 1,463.30 crore under true up for the FY 2013-14 and 2014-15. But they do not provide any justification for the same. Even whatever information provided by them is confusing. TSSPDCL in its filing (pp.50-51) mentioned revenue of Rs. 13,295 crore for the year 2013-14 and supply cost of Rs. 11,865 crore, but mentioned the difference between the two (true down) as Rs. 161.74 crore.</p>	<p>The TSNPDCL has claimed for an amount of Rs. 49 Crores and Rs. 293 Crores for FY 2013-14 and FY 2014-15 respectively under true up along with carrying cost. In absence of the Tariff Order for the FY 2014-15, TSNPDCL has claimed provisional revenue gap for the FY 2014-15 as a true up.</p>
24.	<p>6.2 One of the important reasons for this revenue gap is higher fuel costs. According to a recent report of CAG (see Annexure I) Reliance Industries Ltd received higher price than allowed. According to this report, "As per the price discovery process undertaken by the operator (RIL)... it was categorically indicated that selling price would be rounded off to two decimal points... A review of records relating to sales of gas to consumers, however, revealed that the operator has been charging the gas price at the rate of \$4.205 per unit (three decimal points) from its consumers in place of USD 4.20 per mmBtu, arrived at after rounding of 2 decimal points". The draft of the second audit of the field's books, submitted by the Comptroller and Auditor General to the oil ministry for comments, says Reliance was charging consumers by rounding off the price in three decimal units against the norm of two decimal units, leading to excess billing of \$9.68 million in the first four years of production beginning 2009-10. TSDISCOMS shall be directed to recover the excess amount paid and to that extent true up amount shall be brought down.</p>	Noted

25.	<p>6.3 According to newspaper reports (See Annexure II) the Directorate of Revenue Intelligence has unearthed a scam involving companies inflating the value of coal imports from Indonesia for their power plants. Initial estimates by the agency pegged the overvaluation at Rs 29,000 crore in the period 2011-2014. DRI has raided over 80 shipping companies, intermediaries and laboratories across the country including, Andhra Pradesh in search of documents that show the real value of the imports. Almost all laboratories testing coal in India have been searched by the DRI to obtain the lab reports for verification of the calorific value of the imported coal. According to this investigation almost every importer, including the reputed corporate – public and private, have indulged in overvaluation of coal imports. DRI is learnt to have recovered documents showing the real value of the imports. The overvaluation has an impact on the tariff paid by consumers here as power companies could have a higher tariff fixation based on the inflated rates. It was estimated that the power tariff would be less by Re 1 per unit if the value of imported coal value was not inflated. In the past during public hearings objectors have pointed out many anomalies in imported coal including higher prices. As this is upheld by the investigation of DRI we request the Commission not to allow the true up demanded by DISCOMs to the extent of over valuation of imported coal.</p>	Noted																
26.	<p>Estimation of agriculture consumption (MU)</p> <table border="1" data-bbox="264 1019 798 1198"> <thead> <tr> <th></th> <th>2013-14</th> <th>2014-15</th> <th>2015-16</th> </tr> </thead> <tbody> <tr> <td>NPDCL</td> <td>4348</td> <td>4715</td> <td>4904</td> </tr> <tr> <td>SPDCL</td> <td>6694</td> <td>7238</td> <td>7528</td> </tr> <tr> <td>Total</td> <td>11042</td> <td>11953</td> <td>12432</td> </tr> </tbody> </table> <p>7.1 Filings of NPDCL as well as SPDCL show that power consumption in the agriculture sector in Telangana is increasing irrespective of the situation on the ground. The above consumption figures are arrived at by the DISCOMs on the basis of their claim that they are supplying power for 7 hours per day (p.64, SPDCL). This is far from truth. Most of the time, farmers are not receiving not</p>		2013-14	2014-15	2015-16	NPDCL	4348	4715	4904	SPDCL	6694	7238	7528	Total	11042	11953	12432	<p>In the current and previous year, the licensee has imposed the load restriction to certain categories such as domestic, commercial and industrial consumers to maintain grid stability under insufficient power availability duly maintaining 6 to 7 Hrs per day power supply to Agriculture consumers to the maximum extent possible.</p> <p>The licensee has been estimated Agriculture consumption based on ISI methodology as approved by the Hon'ble Commission from October 2013 onwards.</p> <p>Agl consumption estimation in TSNPDCL is being carried-out on the basis of ISI Methodology wherein energy meters</p>
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even four hours of supply in a day. As such the Commission shall not take the above consumption figures in to account.

27. **7.2** The fact that the agriculture consumption figures provided by the DISCOMs are anomalous comes out from their filings. According to their filings while 9,78,028 pump sets under SPDCL will be consuming 7,528 MU during 2015-16, under NPDCL 10,73,870 pump sets will be consuming 4,904 MU. In other words per pump set consumption will be 7,528 units under SPDCL, it will be 4,567 units in the case of NPDCL. Per pump set consumption in SPDCL will be nearly 70% higher compared to NPDCL, even while hours of supply of electricity are the same under both DISCOMs.

28. Agriculture consumption during 2013-14

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

are provided to the selected DTRs (Sampled DTRs) and the average consumption recorded in a given capacity of the DTR is calculated. This average consumption multiplied by the total number of the same capacity DTRs will be the total Agl consumption on the capacity of DTRs. Similarly, the total Agl consumption on the other capacities of DTRs is arrived. The total Agl consumption on all the capacities of DTRs (16 KVA, 25 KVA, 63 KVA & 100 KVA) will be the total Agl consumption estimation in TSNPDCL.

In TSNPDCL, the total number of Agl DTRs of the capacities said above, is 1,28,011. Out of the, energy meters were provided on 3,168 DTRs of the above said DTRs. The readings from these energy meters are taken every month and arriving monthly Agl consumption estimation.

Also, it is planned to provide energy meters to 10% of the total existing Agl DTRs and hence the accuracy of Agl consumption estimation will be improved further.

Based on the above actual estimated Agl consumption of H1 of 2014-15, the licensee expects growth rate of 4.00% for the H2 of FY 2014-15 and FY 2015-16 over the H2 of FY 2013-14 and revised estimates of FY 2014-15.

	<p>7.3 According to the above table 99% of the farmers with pump sets in Telangana have adopted DSM measures. The electricity consumption figures provided for pump sets with and without DSM measures also gives rise to doubts about the way agriculture consumption figures are provided. On the average pump sets with DSM measures consumed more power than the pump sets without DSM measures. In the case of NPDCL average consumption of pump sets with DSM measures was 4,464 units in an year compared to 1,870 units by pump sets without DSM measures. In the case of SPDCL average consumption of pump sets with DSM measures was 8,373 units in an year compared to 6,102 units by pump sets without DSM measures. This totally goes against the prevailing understanding on DSM measures as well as report on a pilot reported by TSSPDCL. DISCOMs are requested to clarify.</p>	
29.	<p>7.4 Subsidy towards free power to agricultural services is being provided on the basis of 7 hours of power supply to these services. But in reality farmers are getting power for less than five hours. This implies that DISCOMs were compensated more than necessary to supply free power to agriculture. The excess subsidy paid to DISCOMs in this regard shall be recovered.</p>	<p>The Government subsidy towards agriculture consumption for the year is provided as per approved Agl consumption in the Tariff Order issued by the Hon'ble Commission. However, the actual agriculture consumption of the licensee is higher than the approved by the Hon'ble Commission.</p>
30.	<p>7.5 In the absence of metering of agricultural connections DISCOMs claimed that they have arrived at these figures following the ISI methodology suggested by the Commission. But data collected under this methodology is also not complete. To overcome this we suggest that all DTRs serving the agriculture services should be metered so that the consumption estimates are realistic. The Task Force on electricity Sector appointed by the Government of Telangana State also suggested metering of DTRs serving agriculture loads.</p>	<p>In TSNPDCL, the total number of Agl DTRs of the capacities said above, is 1,28,011. Out of the, energy meters were provided on 3,168 DTRs of the above said DTRs and arriving monthly Agl consumption estimation based on the ISI Methodology. Also, it is planned to provide energy meters to 10% of the total existing Agl DTRs to improve the accuracy further.</p> <p>Providing energy meters to all the existing Agl DTRs of 1,28,011 numbers will not only be a much financial burden on the Licensee but also obtaining their readings every month, is difficult as these Agl DTRs are located in remote locations.</p>

31.	<p>7.6 In the past the Commission (Fresh Directive No. 2 of the Tariff Order for FY 2011-12) directed the DISCOMs to furnish meter-wise readings noted and transformer-wise, feeder-wise consumptions measured on all the DTRs and Feeders covered under HVDS scheme. But the DISCOMs are not paying heed to this direction. Information provided through these readings would have thrown much light on electricity consumption in agriculture sector as well as efficacy of HVDS scheme. We request the Commission to direct the DISCOMs once again to furnish the above information at the earliest.</p>	<p>Estimating the Agl Consumption as per ISI methodology approved by the Hon'ble Commission.</p>																																													
32.	<p>Deaths due to shocks 7.7.1 Every year hundreds of farmers are meeting death due to electrical shocks. This is highly avoidable.</p>	<p>Every effort is being made to avoid accidents, by taking up regular maintenance works like replacement of conductor, providing of inter poles , maintenance of DTRs structure and LT lines, providing of earthing. Wide publicity being given requesting Ryots not to handle with Distribution Transformers. During the FY 2014-15 the licensee has erected 4177 middle poles in the loose lines with an expenditure of RS 1.89 Crs, 23207 locations in various lines were rectified to avoid accidents. Further works were awarded to erect 200 middle poles in each section in Discom in the coming 3 months.</p>																																													
	<p>7.7.2 During 2013-14 in Telangana 436 people died due to electrical shocks. More than 50% of these cases under SPDCL took place in the circles/districts of Mahabubnagar and Nalgonda. Similar is the case in the first half of 2014-15. Further these figures are an under estimate of the reality. Farmers are the main victims of this phenomenon.</p> <p>Table: Deaths Due to Electric Shocks</p> <table border="1" data-bbox="264 919 724 1269"> <thead> <tr> <th></th> <th>2013-14</th> <th>First Half of 2014-15</th> </tr> </thead> <tbody> <tr> <td>NPDCL</td> <td>185</td> <td>87</td> </tr> <tr> <td>Mahabubnagar</td> <td>115</td> <td>69</td> </tr> <tr> <td>Nalgonda</td> <td>84</td> <td>25</td> </tr> <tr> <td>SPDCL</td> <td>251</td> <td>129</td> </tr> <tr> <td>Total Telangana</td> <td>436</td> <td>216</td> </tr> </tbody> </table>		2013-14	First Half of 2014-15	NPDCL	185	87	Mahabubnagar	115	69	Nalgonda	84	25	SPDCL	251	129	Total Telangana	436	216	<p>Non Departmental Fatal accidents in NPDCL</p> <table border="1" data-bbox="1188 951 1759 1075"> <thead> <tr> <th rowspan="2"></th> <th colspan="3">2013-14</th> <th colspan="3">2014-15 up to 2/2015</th> </tr> <tr> <th>Human</th> <th>Animal</th> <th>Total</th> <th>Human</th> <th>Animal</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Reported by field</td> <td>159</td> <td>298</td> <td>457</td> <td>156</td> <td>172</td> <td>328</td> </tr> <tr> <td>Exgratia sanctioned by the department</td> <td>27</td> <td>132</td> <td>159</td> <td>76</td> <td>122</td> <td>198</td> </tr> </tbody> </table> <p>As per directions of APERC (Proceeding No.APERC/Secy/EAS/S-101/177/2013, Dt13.08.2013), the NPDCL has enhanced existing ex-gratia amount in case of fatal accidents to non departmental person and animals due to electrocution i.e. Human being from Rs.1 to 2 Lakhs, cattle from RS. 3,000 to Rs. 20,000 and goat and sheep @ Rs.4,000 respectively and sanction procedure is simplified to grant ex- gratia to victims irrespective of the mistake from any side. Further online tracking of accidents taken place in</p>		2013-14			2014-15 up to 2/2015			Human	Animal	Total	Human	Animal	Total	Reported by field	159	298	457	156	172	328	Exgratia sanctioned by the department	27	132	159	76	122	198
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	<p>7.7.3 The DISCOMs did not provide complete details of these incidents like for how many cases DISCOMs took responsibility and in how many cases compensation was paid and amount paid towards compensation. NPDCL mentioned that compensation was paid in 56 cases out of 185 deaths in 2013-14 and in 11 cases out of 87 deaths during the first half of 2014-15. Procedures need to be simplified to see that all victims receive compensation at the earliest.</p>	<p>TSNPDCL and reports submission is commenced from 12/2014 to see that all eligible victims receive compensation at the earliest.</p>
	<p>7.7.4 Even in the electrocution deaths that the DISCOMs had taken responsibility the amount paid (about Rs. 1 lakh per person) is very meagre. Even this meagre amount was not paid properly. There is need to revise the compensation upwards like in the case of railways.</p>	
<p>33.</p>	<p>7.7.5 There shall also be separate mechanism to pin responsibility for deaths due to electricity shocks. In the present case perpetrator it self is the judge. To avoid this anomaly a committee comprising different stakeholders shall go into these deaths and pronounce whether DISCOMs are responsible for these tragedies or not.</p>	<p>Within 24 hours preliminary report and then detailed report is being furnished by ADE. As per Government of Telangana instructions the Chief Electrical Inspector to Government is being reported about the electrical accident. Then jurisdictional Deputy Electrical Inspector will investigate the electrical accident.</p>
<p>34.</p>	<p>7.7.6 More than this these deaths are highly avoidable. These deaths are taking place due to neglect of rural network by the DISCOMs. Every year the Commission allowed Rs. 5 crore to be spent by the DISCOMs on safety measures to avoid such deaths. But DISCOMs did not care to utilise them. NPDCL spent Rs. 34.25 lakh during 2013-14 and Rs. 12.29 crore during first half of 2014-15. If the safety of DTRs were improved many of these deaths could have been avoided.</p> <p>7.7.7 In most of these cases it was the farmers who met this tragic end. These deaths could have been avoided if there were timely and sufficient technical support at the ground level and good quality electrical network. Most of the technical posts like linemen in rural areas are vacant and farmers are forced to attend to repair work on their own with fatal consequences. Thousands of line men posts are lying vacant since a long time. Recently Telangana State</p>	<p>Rural network is strengthened by incorporating additional improvement of transformers, substations and sanction of HT and LT lines in year 2014-15. Tom-tom is done in the villages not to meddle the DTRs for avoiding the Electrical accidents. The Spacers are used to prevent accidents in case of snapping of LT lines. The 11 KV breakers at 33/11 KV substations are put in trimmed condition for cutting of the power supply in case of snapping of 11 KV conductor. Higher size of conductor is replaced where the lines are overloading.</p> <p>Tom-tom is done in the villages about not to meddle the DTRs for avoiding the Electrical accidents. To support the field staff, the labour@ Rs 4000/- per month is deployed in TSNPDCL for extending better services in 250 distributions.</p>

	<p>Government announced that hundreds of electrical engineers will be recruited shortly. But there is no word about recruiting line men. Filling line men posts not only bring down deaths due to shocks but also help to bring down T&D losses and their by add to the income of the DISCOMs.</p>	
35.	<p>Quality of Power 7.8.1 Electricity received by the farmers was of uneven quality with unpredictable interruptions. Power supply timings announced by the Licensees are not being adhered to. It is the responsibility of the Commission under Section 86 (1) (i) of the Electricity Act, 2003 to enforce standards with respect to quality, continuity and reliability of service by licensees.</p> <p>7.8.2 In the past DISCOMs used to post feeder-wise electricity supply details on their websites. But they stopped this practice suddenly some time back. We request the Commission to direct the DISCOMs to post all relevant information on quantum and quality of supply on their websites.</p>	<p>Voltages and quality of power supply to consumers is closely monitored from corporate office level whenever the compliant is received regarding low voltages and poor quality of supply.</p> <p>Everyday 11KV feeder wise electricity supply details are received from field on the same day night hrs and will be reviewed regularly.</p>
36.	<p>DTR failure/repair 7.8.4 DISCOMs are also not attending to maintenance of DTRs properly. Farmers are being forced to incur expenditure in transporting the DTRs. DTRs are also not being repaired in time. In Kanugutta village of Both mandal in Adilabad district it took 10 days to repair the DTR. In Madaka village of Odelu mandal in Karimnagar district it took more than one week to repair the transformer while under Standards of Performance DTRs in rural areas shall be repaired within 48 hours.</p>	<p>Presently 3629No.s Healthy DTRs are available under Rolling stock of TSNPDCL and any failed DTR can be replaced with in 24Hrs.</p> <p>Regarding failure of DTR in Kanugutta village of Both mandal in Adilabad district, it is a 63KVA DTR and failed repeatedly on 20-01-2015 and 5-02-2015.The consumers are drawing water from nearby Kharat project canal and Peddavagu canal by using unauthorized pump sets and DTR is failing on overload. It is instructed to replace the failed DTR immediately and action may be taken against illegal connections. Further there is no compliant of failure DTR in Madaka with 1week duration in this Rabi season.</p>
37.	<p>7.8.5 Low quality of power in rural areas is also because of crumbling transmission and distribution network in rural areas. Decades old conductors are hanging low endangering lives as well as resulting high transmission losses. Many of the DTRs are more than decade old and should have been replaced. Added to this many of these DTRs do not have even AB switches. Depreciated</p>	<p>The old conductors are replaced in phased manner. The old DTRs having age more than 25yr. and drawing more magnetizing currents are survey reported and replaced with new DTRs. Due to complaint of theft of DTRs and meddling of DTRs, small capacity of DTRs are erected and controlled group of DTRs with one AB switch.</p>

	and old parts of T&D network shall be replaced in keeping with prudent maintenance of the network in good health.	
38.	<p>DSM Measures</p> <p>7.9.1 To be eligible for free power, farmers have to undertake demand side management (DSM) measures i.e., installation of capacitors, ISI marked pump sets, HDPE or RPVC piping and frictionless foot-valve. These measures are proposed to bring down quantum electricity consumption in the agriculture sector there by reducing financial burden both on the state government and farmers. Farmers also would like to contribute to this endeavour. Though farmers are interested in taking them up they are facing hurdles in implementing them.</p> <p>7.9.2 DISCOM officials are claiming that more than 90% of the farmers have installed capacitors. But truth is that not even 10% of the farmers installed capacitors. Thousands of junior line men posts in rural areas are lying vacant. Even where junior linemen or assistant linemen are available they do not have proper knowledge in installation of capacitors. Installation of capacitors at a wrong point led to burning of pump sets, which scared other farmers from doing the same.</p>	Agriculture services are being released for the consumers who have paid DDs.
39.	<p>7.9.3 A pilot implemented by SPDCL (p.88) power consumption declined by nearly 10% after installation of capacitors. This implies that by spending Rs. 60 crore to install capacitors at 20 lakh pump sets in Telangana DISCOMs will be able to save about Rs. 500 crore. This alone shall spur the DISCOMs to implement capacitor programme on war footing.</p>	
40.	<p>7.9.4 Use of ISI standard pump set is another important DSM measure. Present pump set efficiency in the State is only 25% and this could be increased to 50% by using ISI standard motors. For proper operation of ISI standard pump sets minimum voltages are required. Under prevailing low voltages in the state these ISI motors do not work. Because of this low voltage, farmers are forced to go in for locally made pump sets which operate even under low voltages. One of the reasons for low voltage is overloading of distribution transformers (DTR) installed for agricultural purposes. This overload is to the extent of 25 to 50%. If this overload problem is addressed successfully farmers can think of using ISI standard</p>	Improvement of DTRs and Erection of new 33/11 KV and 132/33 KV substations are proposed for improvement of voltages at tail end of consumer. Wherever the authorized overloading is noticed, the additional DTR of adequate capacity in the agriculture sector at load centre is installed. The present day voltage will suitable for ISI pumpsets.

	motors. This can be addressed by increasing the number of DTRs of adequate capacity in the agriculture sector. We request the state government and DISCOMs to install additional DTRs to solve low voltage problem so that farmers will be emboldened to go in for ISI standard motors.	
41.	7.9.5 Though the farmers may be willing to install ISI standard motors in the event of voltages improving the financial burden on them will be onerous and it will be good to explore the ways of minimizing burden on them in replacing the non-standard motors with ISI standards motors. In Tamil Nadu, the State government and utilities are said to have taken up a programme where a third party – Electricity Service Company (ESC) – takes the responsibility of replacing the motors and is given a share in the savings of electricity consequent to installation of standard motors. We request the State government to explore this option also as it will not burden the state government as well as the farmers.	It not the purview of the Licensee as it is policy matter.
42.	7.10.1 Since 2005 HVDS programme is taken up in the state as a solution to the low voltage problem. Until now thousands of crores of rupees were spent on this but not even 10% of the pump sets were covered. A HVDS transformer is five times costlier than the regular DTRs being used at present. It was felt that if the same amount was spent on adding regular DTRs by this time the low voltage problem would have been solved. Even if the present additional load on existing DTRs is assumed as 50% then the estimated expenditure would be 50% of the cost of the existing DTRs. If we want to replace all the DTRs with HVDS DTRs the expenditure would be five times. The question is why spend 550% more when we could achieve with 50% only. We may be wrong in these calculations. Farming community in the state does not have any information on or insight in to this HVDS programme. Farming community in the state should have been taken in to confidence while formulating solution to low voltage in rural areas. This is not too late. We request the state government as well as the DISCOMs to place all the information related to HVDS before the public including farmers for an informed discussion on the problems being faced by both the DISCOMs and farmers in the state that will lead to a solution that is beneficial to all stakeholders.	2,49,845 Agl services are converted into HVDS since 2005 out of 1007669 Agl services existing in TSNPDCL as on 28.02.2015. This shows that 24.7% Agl services are converted into HVDS until now. Further 1,24,335 Agl services are covered under JICA which is programmed upto FY 2016-17. This shows that 37% of the pumpsets are covered. Balance pumpsets will be taken up in phased manner.

43.	<p>7.10.2 Over the last few years hundreds of crores were spent on implementing HVDS for agriculture pump-sets. The present filings also show that DISCOMs plan to spend more money on this. Before taking this programme forward there should have been a thorough review of its implementation until now. But there appears to be no such exercise. Given the serious implications of this investment (Consumers have to bear this burden in the form of higher cost of service) we place below our analysis of the investment under HVDS.</p>	<p>Envisaged benefits are achieved on HVDS implemented 11 KV feeders. The transformers failures are decreased and theft of energy is arrested. The voltage are increased at consumer side, Reliable and quality power being supplied to all the consumers and they were satisfied with HVDS. Further 11 KV line losses are decreased.</p> <p>The benefits accrued after implementation of HVDS are computed and enclosed as annexure (A).</p>																								
44.	<p>7.10.3 For the following analysis we have compared LT – DTR and HVDS. We have taken the transformer capacity as 63 kVA. Hours of supply in a day is assumed as 7 hours and number of days as 240 days. Cost of power is assumed as Rs. 3.00 per unit. We examined this under three power factor capacities – 0.6, 0.7 and 0.8</p> <p>The results of our analysis are presented in the following table. In this table reduction in line losses are taken as returns on investing on HVDS.</p> <table border="1" data-bbox="264 849 1052 1166"> <thead> <tr> <th>Power Factor</th> <th>Cost of HVDS (Rs.)</th> <th>Cost of Lt – DTR (Rs.)</th> <th>Additional Cost (Rs.)</th> <th>Returns per year from HVDS (Rs.)</th> <th>Payback period (Years)</th> </tr> </thead> <tbody> <tr> <td>0.6</td> <td>6,29,628</td> <td>1,15,000</td> <td>5,14,628</td> <td>18,949</td> <td>27.16</td> </tr> <tr> <td>0.7</td> <td>6,29,628</td> <td>1,15,000</td> <td>5,14,628</td> <td>13,923</td> <td>36.96</td> </tr> <tr> <td>0.8</td> <td>6,29,628</td> <td>1,15,000</td> <td>5,14,628</td> <td>10,660</td> <td>48.28</td> </tr> </tbody> </table>	Power Factor	Cost of HVDS (Rs.)	Cost of Lt – DTR (Rs.)	Additional Cost (Rs.)	Returns per year from HVDS (Rs.)	Payback period (Years)	0.6	6,29,628	1,15,000	5,14,628	18,949	27.16	0.7	6,29,628	1,15,000	5,14,628	13,923	36.96	0.8	6,29,628	1,15,000	5,14,628	10,660	48.28	<p>The HVDS works were taken up after analyzing the losses as a major factor. The distribution losses reduced is to be considered as saving in the natural resources like coal, gas, etc., used for power generation. In addition to the above DTRs are shifted to the load centers in HVDS duly improving the voltage profile in the LT system.</p>
Power Factor	Cost of HVDS (Rs.)	Cost of Lt – DTR (Rs.)	Additional Cost (Rs.)	Returns per year from HVDS (Rs.)	Payback period (Years)																					
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45.	<p>7.10.4 In Andhra Pradesh a power factors of 0.70/0.80 reflect the prevailing situation. Under these conditions it takes 37 to 48 years to recover the investment made in to the HVDS system, let alone profits over it. In other words the payback period for these investments is about 37 to 48 years. The guaranteed life of these transformers is about 3 years and its life may extend up to 10</p>	<p>Farmers are very much in support of HVDS system and farmers are requesting for HVDS system to their pump sets as there is good voltage profile and better discharge of water.</p>																								

years, but its' payback period is several times more. Thus, financially speaking the HVDS does not appear to be attractive. Still the DISCOMs in the state are rushing in to implement it on large scale. And farmers are being coerced in to accepting it.

Year wise pump sets covered and expenditure incurred un HVDS system are placed below.

46. **7.10.5** One of the important reasons shown in promoting the HVDS system was elimination of unauthorised agriculture connections and theft. Experience in other states like Rajasthan and Uttar Pradesh shows that HVDS is not a deterrent to these practices and even under HVDS system theft continues to take place. We hear that Noida Power Company Limited (NDPL) in UP which went in to HVDS on a large scale is now thinking about winding it up.
7.10.6 Though the returns from this HVDS scheme are doubtful it will surely end up as a huge burden on the consumers in the form of Cost of Service (COS) as these transformers are four times more costly than the present transformers.
7.10.7 Based on these facts we request the Commission to review the past implementation of the HVDS in the state and also to put the presently proposed scheme with the support of JIBC to strictest test. We also request the Commission to direct the DISCOMs to provide us information on amount spent on HVDS and number of pump sets converted to HVDS each year since the programme was taken up.

Year	No.of Pump Sets	Amount in Rs. Crs
2005-06	44729	83.13
2006-07	5232	6.52
2007-08	14437	35.44
2008-09	13672	50.63
2009-10	77648	68.35
2010-11	20460	78.59
2011-12	26332	80.06
2012-13	13771	52.8
2013-14	7621	25.27
2014-15	25943	80.28
Total	249845	561.07

47. Directives on running neutral wire
7.10.8 In the past the Commission directed the DISCOMs to run neutral wire from 33/11 kV substations to all single phase transformers, particularly in the back ground accidents with single phase HVDS transformers. TSSPDCL replied that instruction were issued for preparation of estimates under T&D improvements and furnishing proposals under feeder works for executing the work of running of neutral wire in villages. One thing is even after such a long time they are still in the stage of preparing the estimates. Another thing is that as DTRs of HVDS includes cost of running neutral wire from HVDS DTR to the substation preparation of estimates and new expenditure shall not arise. The whole affair also shows that DISCOMs are least bothered about safety of the

Due to financial constraint TSNPDCL has programmed to take up to run neutral wire from 33/11 KV SS to all single phase transformers in a phased manner. The details are as follows.

Circle wise Target / Achieved to erect Neutral wire in Kms.													
Financial Year	Phase	WGL		KNR		KMM		NZB		ADB		NPDCCL	
		Target	Achieved	Target	Achieved	Target	Achieved	Target	Achieved	Target	Achieved	Target	Achieved
2014-15	I	150		157		120	137	150		120		697	137
2015-16	II	300		300		300		300		300		1500	0
2016-17	III	300		300		300		300		300		1500	0
2017-18	IV	300		300		300		300		300		1500	0
2018-19	V	300		300		300		300		300		1500	0
2019-20	VI	300		300		300		300		300		1500	0

(*) In Khammam circle 137 Km of line work is completed

	consumers.	<p>In Karimnagar circle 1023 Km line sanctioned and work is to be taken up.</p> <p>Further, it is to inform that cost of running neutral wire from HVDS DTR to the substation will be included in the DPRs of Single phase HVDS if the scheme is taken up in future.</p>															
48.	<p>8.1 Filings of both the TSDISCOMs show that on the T&D losses front the situation in fact is deteriorating. During 2015-16 T&D losses in NPDCL area will be 15.56% and in SPDCL area 14.91%. There is scope to bring down these losses below 7%. Way back in 2010-11 EPDCL of Andhra Pradesh clocked T&D losses of 6.96%. DISCOMS shall be directed to take concerted action to bring down these losses. Lower T&D losses lead to lower power purchase cost and lower tariff burden.</p>	<p>The Licensee is putting most efforts in reducing losses. Regular network strengthening works for reduction of technical losses with various schemes are being taken up and necessary steps are being taken up for reducing commercial losses by conducting regular DPE inspections. TSNPDCL has under taken various loss reduction measures distribution losses have brought down from 30.52% in 2000-01 to 14.89% in 2013-14.</p> <p>The actual Distribution losses for the FY 2013-14 and projected distribution loss for FY 2014-15 and FY 2015-16 tabulated below</p> <table border="1" data-bbox="1192 816 1986 959"> <thead> <tr> <th rowspan="2">Particulars</th> <th>2013-14</th> <th>2014-15</th> <th>2015-16</th> </tr> <tr> <th>Actual</th> <th>Proj.</th> <th>Proj.</th> </tr> </thead> <tbody> <tr> <td>Discom Losses (incl EHT) (%)</td> <td>13.32%</td> <td>11.97%</td> <td>11.18%</td> </tr> <tr> <td>Discom Losses (Excl EHT) (%)</td> <td>14.89%</td> <td>13.41%</td> <td>12.58%</td> </tr> </tbody> </table>	Particulars	2013-14	2014-15	2015-16	Actual	Proj.	Proj.	Discom Losses (incl EHT) (%)	13.32%	11.97%	11.18%	Discom Losses (Excl EHT) (%)	14.89%	13.41%	12.58%
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49.	<p>8.2 Within TSSPDCL the Hyderabad South Circle T&D losses are in the range of nearly 50% of the power supplied. During the past hearings also we have brought this to the notice of the Commission. Last year the High Court treated a letter written by an electricity consumer as a petition and after hearing different parties directed the authorities to take steps to bring down these losses. Following this some raids were conducted in some of the areas falling under this circle. According to a newspaper report out of 887 services inspected there were 20 instances of theft and 350 instances of meter tampering (The Hindu, 14th April, 2014). But these raids seem to have stopped in the wake of elections to Lok Sabha and state Assembly and were not resumed after the</p>	<p>The issue is not pertains to NPDCL</p>															

	<p>elections. We request the Commission to direct the TSSPDCL to resume inspection of services. Bringing down these losses in Hyderabad South Circle alone will bring additional revenue of about Rs.300 crore per year.</p>																							
50.	<p>8.3 According to TSSPDCL's filings during FY 2013-14 cases were booked in 21.37% of the services inspected for malpractice. During FY 2014-15, up to 30th September 2014 cases were booked in 18.90% of the services inspected. This may be because of lack of awareness on the part of consumers or intent to benefit from malpractices and lack of proper vigilance on the part the DISCOM. TSNPDCL did not report information related to inspections. We request the Commission to direct the DISCOMs to create awareness among consumers and deal strictly with malpractices.</p>	<p>TSNPDCL has furnished the these information along with the filing ARR & Filing of Proposed Tariffs for the FY 2015-16 under performance parameters.</p> <p>Special focus was made on Cat-II and other High value services during inspections and booked Malpractice cases and also proposed Development charges for additional loads.</p> <p>The following progress was made during the years 2013-14 & 2014-15 (April-2014 to Feb-2015)</p> <table border="1" data-bbox="1192 711 1759 844"> <thead> <tr> <th rowspan="2">Sl.No.</th> <th rowspan="2">Year</th> <th colspan="2">Malpractice</th> <th colspan="2">Realization</th> </tr> <tr> <th>Nos.</th> <th>Amount.</th> <th>Nos.</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2013-14</td> <td>2335</td> <td>319</td> <td>304</td> <td>175</td> </tr> <tr> <td>2</td> <td>2014-15</td> <td>1134</td> <td>148</td> <td>408</td> <td>60</td> </tr> </tbody> </table>	Sl.No.	Year	Malpractice		Realization		Nos.	Amount.	Nos.	Amount	1	2013-14	2335	319	304	175	2	2014-15	1134	148	408	60
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		Nos.	Amount.	Nos.	Amount																			
1	2013-14	2335	319	304	175																			
2	2014-15	1134	148	408	60																			
51.	<p>Arrears</p> <p>9.1 Arrears pending for over six months to be received from consumers (with arrears above Rs. 50,000)as on 30th September 2014 stands at Rs. 2,146.34 crore (SPDCL – Rs. 1,796.07 crore and NPDCL - Rs. 350.27 crore). HT industries account for 50% of these arrears. If ordinary domestic consumers delay payments by two weeks their services are disconnected promptly. But, how do these people with arrears to the tune of crores continue to receive power. In the past information related to court cases related to these arrears used to be provided. At present the same is missing.</p>	<p>All the services except the Govt. are promptly disconnected for nonpayment of CC dues.</p> <p>Out of Rs. 350.27 crores, the amount outstanding from HT consumers Rs.151.41 crores. The HT consumers have approached the Hon'ble court of law on levy of PDL & PCL charges during R&C period from 12-09-2012 to 31-07-2013. The services could not be disconnected as the matter is subjudice.</p> <p>Most of the services with above Rs.50,000/- CC dues are SC/ST and Govt. services. The Govt. of Telangana has released Rs.64.54 crores towards Scheduled Caste consumers CC bills whose consumption is 0-50 units per month during the current Financial Year. The payment of CC dues in respect of ST consumers is under process.</p>																						

Annexure - A

HVDS ANALYSIS (Loss Reduction)

Description	Ghanpur M Feeder, Machareddy Section		Medaram Feeder, Dharmaram Section		Alur I & II Feeders, Dehagaon Section		TOTAL	
	Pre HVDS	Post HVDS	Pre HVDS	Post HVDS	Pre HVDS	Post HVDS	Pre HVDS	Post HVDS
Initial Raeding	11813.5 (15-01-2012)	16675.6 (15-01-2013)	9253.79 (14-12-2008)	1967.11 (14-12-2011)	175336 (01-12-2008)	3044.95 (01-12-2012)		
Final Reading	12544.1 (15-03-2012)	17539.1 (15-03-2013)	9896.2 (15-06-2009)	2542.17 (15-06-2012)	176926 (01-03-2009)	3269.33 (01-03-2013)		
Difference	730.6	863.5	642.41	575.06	1590	224.38		
Multiplication factor	1000	1000	4000	4000	400	4000		
Consumption	730600	863500	2569640	2300240	636000	897520		
Consumption per month	365300	431750	428273	383373	212000	299173	1005573	1114297
No of Services	347	444	861	885	683	992	1891	2321
Unauthorised services regularised	97		24		309		430	
Consumption per month per AGL Service	1052.74	972.41	497.41	433.19	310.40	301.59	531.77	480.09
Difference of consumption of pre to post HVDS	80.33		64.22		8.81		51.67	
Loss reduction after HVDS Conversion(A)	35666		56838		8739		119937	
% Loss Reduction	8.26		13.27		4.12		11.93	

E - గ్రూప్ : అభ్యంతరముల / సూచనలకు సమాధానములు

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
1.	<p>విద్యుత్ సరఫరా నిర్ణీత సమయం ప్రకారం సరఫరా కాకపోవడం : రెగ్యులేటరీ కమీషన్ నిర్ణయించిన విధంగా పంపు సెట్లకు విద్యుత్ సరఫరా కావడం లేదు. అందువల్ల కరెంటు ఎప్పుడు వస్తుందో ఎప్పుడు పోతుందో తెలియదు. సబ్ స్టేషన్ల వారిగా కాల నిర్ణయపట్టిక లేదు నిజామాబాద్, మెదక్, వరంగల్ జిల్లా లలో వేలాది ఎకరాల పంటలు పంపు సెట్ల కిందఎండిపోయి రాతంగం రునగ్రస్తులయ్యారు ఋణం పెరగతం వాళ్ళ వారే ఆత్మహత్యలకు పాల్పడుతున్నారు. ముందు విద్యుత్ సరఫరా కొరతను ప్రచారం చాయనందున రతులు పాత పద్ధతిలోనే పంటలు వేశారు. రాష్ట్రంలో 40 లక్షల ఎకరాలు పంపు సెట్ల కింద సాగుచేయాల్సి ఉండగా 7-8 లక్షల ఎకరాలు మాత్రమే సాగుయ్యింది. అది కూడా దిగుబడులు తగ్గాయి</p>	<p>ముందే ప్రకటించిన నిర్ణీత సమయం ప్రకారం వ్యవసాయానికి విద్యుత్ సరఫరా చేయబడుచున్నది.</p>
2.	<p>డిస్కాంల నిర్లక్ష్యం వలన ట్రాన్స్ ఫార్మర్లు మరియు పంపు సెట్లు కాలిపోవడం డిస్కాంలు ట్రాన్స్ ఫార్మర్ల నిర్లక్ష్యం చేస్తుంది. AB స్వీచ్లు ఉండవు. ట్రాన్స్ ఫార్మర్ చుట్టూ గడ్డి గాదం పెరిగి ఉంటుంది. ఎర్టింగ్ ఉండదు. వీటి ఫలితంగా ట్రాన్స్ ఫార్మర్లు కాలిపోవడం వాటి ఫలితంగా పంపు సెట్లు కాలిపోతున్నాయి వేల రూపాయలు వ్యయం చేసి తిరిగి పంపు సెట్లు బాగు చేయించుకోవడం చేతకాక వదిలి వేస్తున్నారు</p>	<p>డిస్ట్రి బ్యూషన్ ట్రాన్స్ ఫార్మర్లు వాటి మరమ్మత్తులను గుర్తించి సరి చేయుటకు తగు చర్యలు తీసుకోవడం జరుగుతుంది. 2014-15 సంవత్సరంలో 6,797 AB స్వీచ్లు మరమ్మత్తులు చేయడం జరిగింది. ఎర్టింగ్ లోని లోపాలను గుర్తించి ఎప్పటికప్పుడు మరమ్మత్తులు చేయడం జరుగుతున్నది.</p>
3.	<p>ట్రాన్స్ మిషన్ - కాలం గతించిన కండక్టర్ తో విద్యుత్ సరఫరా చేయడం వల్ల వస్తున్నా నష్టాలు: ట్రాన్స్ మిషన్ కండక్టర్ 30-35 సంవత్సరాల క్రితం వేసిన వాటితోనే విద్యుత్ సరఫరా చేస్తున్నారు ఫలితంగా సరఫరా నష్టాలు ఎక్కువగా ఉంటున్నాయి. చాలా పంపు సెట్లకు 5-6 పోల్స్ దూరం సర్వీసు వీరు రైతులకు కనెక్షన్లు ఇచ్చారు దీనివల్ల లో వోల్టేజి సమస్య వస్తున్నది 20 సంవత్సరాలు కాలం గతించిన కండక్టర్ మార్పడానికి దెబ్బ తిన్న స్థంబాలను తిరిగి కొత్తవి వేయడానికి రెగ్యులేటరీ కమీషన్ ఆదేశాలు ఇవ్వాలి.</p>	<p>కాలం చెల్లిన విద్యుత్ కండక్టర్, పోల్లు, ట్రాన్స్ ఫార్మర్లు మొదలనవి గుర్తించి వారి స్థానంలో కొత్తవి ఏర్పాటు చేయుటకు ఎప్పటికప్పుడు తగు చర్యలు తీసుకోవడం జరుగుతున్నది.</p>
4.	<p>డిస్కాం లో - ట్రాన్స్ కో లో ఖాళీలను భర్తీ చేయకపోవడం వల్ల సరఫరా నష్టాలు పెరగుట :</p>	<p>సంస్థ క్షేత్ర స్థాయి సిబ్బంది కొరత ఉంది, ప్రభుత్వ</p>

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	<p>డిస్కాంలలో ట్రాన్స్ కొలలో లైన్ మెన్ లతో పాటు ఇతర సిబ్బంది కాళ్ళు కొనసాగిస్తున్నారు నిర్ణీత ఉద్యోగాలు భర్తీ చేస్తే తమకు ఆదాయం తగ్గుతుందన్న కారణంగా సంవత్సరాల తరబడి ఉద్యోగాలు భార్తీచేయకపోవడం ఫలితంగా వినియోగదారులకు సరఫరా లోపాలను సరిదిద్దడానికి సిబ్బంది సహాయంలేరు. అందువల్ల వారే స్వంత రిపేర్ చేసుకోవడం వల్ల విద్యుత్ షాక్ కు గురై మరణిస్తున్నారు ఇలా మరణించిన వారి తప్పిగాన్ని వారి పైకే తోసి తప్పకుంటున్నారు. సిబ్బంది నియామకానికి రేగ్యులేటరీ కమీషన్ డిస్కాం, ట్రాన్స్ కో సంస్థలను ఆదేశించాలి.</p>	<p>అనుమతులతో సిబ్బంది నియమాకాలు తగు చర్యలు తీసుకోవడం జరుగుతున్నది. సిబ్బంది కొరతను అధిగమించడానికి సంస్థ పరిధిలో 250 తాత్కాలిక సిబ్బందిని నియమించడం జరిగినది.</p>
5.	<p>రాష్ట్ర విభజన ఒప్పందాల అమలు కాకపోవడం వలన విద్యుత్ కొరత గురించి: రాష్ట్ర విభజన చట్టం ప్రకారం రావాల్సిన విద్యుత్ సరఫరా కావడం లేదు. తెలంగాణా రాష్ట్రంలో విద్యుత్ ఉత్పత్తి కేంద్రాలు తగినన్ని లేవు. గతంలో వినియోగించుకున్న మాదిరిగా రానున్న సంవత్సరాలలో వినియోగించుకోవాలని చెప్పారు. షెడ్యూల్డ్ 12(సి) లో ఉదాహరించినవేవి అమలు జరగడం లేదు.</p> <p>92 ప్రకారం ఇవ్వాలిన్న విద్యుత్ రావడం లేదు. రానున్న 3 సంవత్సరాల వరకు విద్యుత్ కొరత ప్రస్తుతం ఉన్నట్టే ఉంటుందని గౌరవ ముఖ్య మంత్రి గారు ప్రకటిస్తున్నారు విభజన చట్టాన్ని అమలు చేయాల్సిందిగా రెండు రాష్ట్ర ప్రభుత్వాలను ఆదేశించాలని రేగ్యులేటరీ కమీషన్ ను కోరుతున్నాను. చట్టంలో ఉన్న ప్రకారం రాష్ట్రానికి కేంద్ర ప్రభుత్వం ఇస్తామన్న 4000 మెగా వాట్ల ప్రాజెక్టు చర్యలు చేపట్టాల్సిందిగా ప్రభుత్వాన్ని ఆదేశించాలి</p>	<p>రాష్ట్ర పునర్ విభజన చట్టం 2014 ను అనుసరించి లైసెన్సీ రావలసిన విద్యుత్ పొందుటకు తగు చర్యలు తీసుకోవడం జరుగుతున్నది.</p>
6.	<p>పంపు సెట్ల కింద వేసిన పంటల నష్ట పరిహారం చెల్లించుట గురించి: విద్యుత్ సంస్థలు మరియు ప్రభుత్వం ముందు సరఫరా పరిస్థితి ప్రకటించక పోవడంతో రైతులు పంటలు వేసి నష్టపోతున్నారు పెట్టిన పెట్టుబడి కూడా పూర్తిగా నష్టాలతో కూరుకు పోతుంది అందువలన పంటల నష్టాన్ని</p>	<p>లైసెన్సీ పరిధిలో లేని అంశము.</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	రెవిన్యూ అధికారులతో పంచనామా చేయించి ప్రభుత్వం కానీ, విద్యుత్ సంస్థ కానీ పరిహారం చెల్లించే విధంగా ఆదేశాలు ఇవ్వగలరు.	
7.	<p>పంపు సెట్లకు ట్రాన్స్ ఫార్మర్లకు కెపాసిటర్లు బిగించకపోవటం: గతంలో రెగ్యులేటరీ కమీషన్ ఆదేశించినప్పటికీ పెట్టలేదు. కొంతమంది రైతులు కొనుగోలు చేసి తమ ఇళ్లలోనే పెట్టుకున్నారు డిస్కాం లు కెపాసిటర్లు పెట్టినట్లు రెగ్యులేటరీ కమీషన్ కు తెలియపరుస్తున్నారావాస్తవాలను రెగ్యులేటరీ కమీషన్ ఒక విచారణాధికారిని నియమించి స్వయంగా తెలుసుకోవాలని కోరుతున్నాం. కెపాసిటర్లు పెట్టడం వల్ల కనీసం 10 శాతం విద్యుత్ ఆదా అవుతుంది.</p>	<p>విద్యుత్ వినియోగదారులకు విద్యుత్ పొదుపు మార్గాలను వివిధ ప్రసార సాధనాల ద్వారా ప్రచారం కల్పించడం జరుగుతున్నది. ఈ సంస్థ పరిధిలోని వివిధ సబ్-స్టేషన్లలో 282 కెపాసిటర్లను (2 MVAR) ఏర్పాటు చేయడమైనది మరియు 164 కెపాసిటర్లు (2 MVAR/1 MVAR) ఏర్పాటుకు పనులు జరుగుచున్నవి.</p>
8.	<p>విద్యుత్ షాక్ వలన మరణించిన వారికి పరిహారం చెల్లించకపోవటం: విద్యుత్ షాక్ వల్ల మరణించిన వారిలో చాలా మంది ఎక్స్ గ్రేషియా ఇవ్వలేదు. విచారణ పేరుతో సంవత్సరాల తరబడి కాలయాపన చేస్తున్నారు చని పోయిన కొంత మందికి కేసుకుడా రిజిస్టర్ చేయలేదు. ఈ విషయాలు విచారణ సందర్భంగా మీ దృష్టికి తెస్తాను</p>	<p>గౌరవ కమీషన్ వారి ఆదేశాల మేరకు సిబ్బందితర విద్యుత్ ప్రమాదాలకు గురి అయి మరణించిన యెడల మనుష్యులకు రూ.2,00,000-00 మరియు పశువులకు రూ.20,000-00 చొప్పున ఎక్స్ గ్రేషియా శాఖ పరమైన విచారణ అనంతరం మరణించిన వారి కుటుంబ సభ్యులకు అందించడం జరుగుతుంది.</p>
9	<p>విద్యుత్ సంస్థల నిర్వహణ సమీక్షకు కనీసం మండల సతి కమిటీని వేయాలి. రాష్ట్ర స్థాయిలో అఖిల పక్ష కమిటీ వేయాలి. ఇందుకు ప్రభుత్వాన్ని ఆదేశించాలని కోరుతున్నాం.</p>	<p>లైసెన్సీ పరిధిలో లేని అంశము.</p>
10	<p>పై అంశాలతో పాటు మరి కొన్ని అంశాలను మీ ముందు ప్రత్యక్షంగా చెప్పదలచుకున్నాను కావున అవకాశం ఇవ్వగలరని కోరుచున్నాను.</p>	<p>లైసెన్సీ పరిధిలో లేని అంశము.</p>

2015-16 సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు ప్రతిపాదిత ఛార్జీల పై కెచ్చల రంగయ్య రాష్ట్ర ప్రధాన కార్యదర్శి

అఖిల భారత రైతు కులీ సంఘం (ఎఐకెఎంఎస్), గారి అభ్యంతరముల / సూచనలకు సమాధానములు

చిరునామ: ప్లాట్ నెంబి58, మార్క్స్ భవన్, విద్యానగర్, హైదరాబాద్ - 44 తెలంగాణ రాష్ట్రం

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
2..1	విద్యుత్ ఛార్జీలు అమలులోకి వచ్చే కంటే 120 రోజుల ముందుగా కొత్త టారిఫ్స్ ప్రకటన ప్రక్రియ ప్రారంభం కావాలి. కానీ 48 రోజుల ముందు మాత్రమే కొత్త టారిఫ్స్ లపై ప్రతిపాదన ప్రకటించారు. వ్యవధి తక్కువ వున్నందున అభ్యంతరాలు తెలపడానికి ప్రజా విచారణ సందర్భంలో కూడా అవకాశం ఇవ్వగలరు. నోటిఫికేషన్ తరువాత కనీసం 30 రోజులుండాలి. ఏ.అర్.అర్. తరిఫ్స్ వివరాలు ఒకేసారి ప్రకటించలేదు. వివరంగా, విస్తృతంగా వినియోగదారులు ప్రజా విచారణలో పాల్గొనే అవకాశం ఇవ్వగలరని మనవి.	గౌరవ కమీషన్ ముందు లైసెన్సీ 2015-16 సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు ప్రతిపాదిత ధరలను 07.02.2015 రోజున సమర్పించడమైనది. దీనికి సంబంధించి ARR & FPT ల పై 11.02.2015 రోజున గౌరవ కమీషన్ ఆదేశానుసారం బహిరంగ ప్రకటన జారి చేయబడినది.
3..1	విద్యుత్ అవసరాలు - అంచనాలు : రాష్ట్ర విభజనకారణంగా విద్యుత్ ఉత్పత్తి వాటాల విషయంలో స్పష్టత లేదు. ఎవరికీ ఎంతా వాటా తేలకుండా లభ్యతపై అంచనాకు ఎలా వస్తారు దీనిని కమీషన్ నిర్ధారించాలి.	ఆప్ట పునర్విభజన చట్టమును అనుసరించి రెండు రాష్ట్రాలలో విద్యుత్ ఉత్పత్తి కేంద్రాలలో వాటాను పరిగణించి విద్యుత్ లభ్యత పై అంచనా సమర్పించడమైనది.
3.2	వచ్చే సంవత్సరానికి అవసరం అయిన విద్యుత్ అంచనా వాస్తవాలపై ఆధారపడి లెక్కించాలి. విద్యుత్ పొదుపు, సోలార్ విద్యుత్ వినియోగం అంశాలు పరిగణలోకి తీసుకుంటే నేడు వేసిన అంచనాలు ఎక్కువగా వున్నాయి.	2015-16 సంవత్సరానికి విద్యుత్ అమ్మకాలను 2009-10 సంవత్సరము నుండి 2014-15 మొదటి అర్థ సంవత్సరము వరకు ఉన్న వాస్తవ విద్యుత్ అమ్మకాల ఆధారంగా అంచనా వేయడమైనది.
3.3	వ్యవసాయ వినియోగంలో అనేక ప్రమాణాలు తీసుకోవడం ద్వారా విద్యుత్ పొదుపుకి అవకాశం వుంది అనేది వాస్తవం. డిటిఅర్, కెపాసిటర్లు వినియోగం ద్వారా విద్యుత్ పొదుపు పెరుగుతుంది. అలాగే వాస్తవ వినియోగ లెక్కలు నిర్దిష్టంగా	గౌరవ కమీషన్ వారు ఆమోదించిన ISI విధానము ఆధారంగా లైసెన్సీ వ్యవసాయ రంగ విద్యుత్ వినియోగం అంచనా వేయబడుతున్నది.

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	ఉండాలి. ఆ విధంగా లేవు.	
3.4	<p>పంపిణి - సరఫరా నష్టాలు తగ్గా లి కనీ విచిత్రం ఏమిటి అంటే పెరుగుతున్నట్లు లెక్కలు చూపారు.</p> <p>ఉత్తర డివిజన్ లో 2013-14లో 13.31 నుండి 15.56% కి పెంచారు.</p> <p>దక్షిణ డివిజన్ లో 2013-14లో 13.20% నుండి 14.91 కి పెంచారు.</p> <p>సామర్థ్యం పెరుగుతున్నదా? తగ్గు తుందా? వాస్తవాలు పరిశీలించాలి. ఎక్కువ వృధా నుండి తక్కువ వృధాకి దారితీయాలిగాని ఎక్కువ వృధా జరగటానికి అనుమతి అడగటం విచిత్రంగా వుంది. వృధాని అరికట్టాలి దీని మూలంగా ఖర్చు తగ్గు తుంది</p>	<p>గౌరవ కమీషన్ ముందు 2015-16 సంవత్సరం రిటైల్ సరఫరా వ్యాపారానికి సమర్పించిన సమగ్ర ఆదాయ ఆవశ్యకత మరియు ధరల ప్రతిపాదనలో పంపిణి నష్టాలను ఈ క్రింది విధంగా తెలియపర్చబడినది.</p> <p>2013-14 సంవత్సరానికి వాస్తవ పంపిణి నష్టాలు 14.89%</p> <p>2014-15 సంవత్సరానికి పరిగణించిన పంపిణి నష్టాలు 13.41%</p> <p>2015-16 సంవత్సరానికి పరిగణించిన పంపిణి నష్టాలు 12.58%</p> <p>విద్యుత్ పంపిణి నష్టాలను తగ్గించుటకొరకు అందుబాటులో ఉన్న చర్యలను తీసుకోవడమైనది. ఫలితంగా 2000-01 సంవత్సరం లో 30.52% గా ఉన్న పంపిణి నష్టాలను 2013-14 సంవత్సరానికి 14.89%కు తగ్గించడం జరిగింది</p>
4.1	<p>విద్యుత్ కొనుగోలు ఖరీదు వార్షిక ఆదాయ అవసరాలలో విద్యుత్ కొనుగోలుకే 77% ఖర్చు చేస్తున్నట్లు తెలిపారు. ఇది పరిశీలించాలి.</p>	<p>విద్యుత్ సరఫరా వ్యయంలో అత్యధిక భాగం విద్యుత్ కొనుగోలు వ్యయం ఉంటుంది.</p>
4.2	<p>విద్యుత్ కొనుగోలు ఒప్పందాలు అన్ని ఉమ్మడి రాష్ట్రంలో చేసుకున్నవి అనే కారణంతో ఆం.ప్ర. ప్రభుత్వం రద్దు కు ప్రతిపాదించింది రెండు రాష్ట్రాల మధ్య విద్యుత్ కేటాయింపులు, వాటి ధరలలో మార్పులు బహిరంగ విచారణ ద్వారానే జరగాలి.</p>	<p>డిస్కాం పరిధిలో లేని అంశము.</p>
4.3	<p>వార్షిక అవసరం రెండు డిస్కాంలకు రూ.26.473.77 కోట్లు పేర్కొని లోటు పూడ్చడానికి రూ.1088.61 కోట్ల కొత్త చార్జీలు వేస్తూ, ప్రభుత్వం నుండి రూ.6476.30 కోట్లు అవసరం ఉంటుందని పేర్కొన్నారు దీనిలో పై ప్రమాణాలు పాటిస్తే అదనపు</p>	<p>2013-14 సంవత్సరములో గౌరవ కమీషన్ జారీ చేసిన ధరల ఉత్తర్య ప్రకారము సగటు విద్యుత్ సరఫరా వ్యయం యూనిట్ ఒక్కంటికి రూ.5.51 గా ఉండగా 2015-16 సంవత్సరానికి అంచనా వేసిన ఆదాయ ఆవశ్యకతను</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	చార్జీలు వేయవలసిన అవసరం లేదు.	అనుసరించి సగటు విద్యుత్ సరఫరా వ్యయం యూనిట్ ఒక్కంటికి రూ.6.22గా ఉంది. ఇది 2013-14 సంవత్సరములో పోల్చితే 12.89% పెరుగుదలగా ఉన్నది.
4.4	<p>కొత్త విద్యుత్ స్థిర చార్జీలలో వ్యత్యాసాలు</p> <p>కెటిపిపి-కెటిపిఎస్-VI కి యూనిట్ కి రూ.1.79 పై. కెటిపిపి-II కి యూనిట్ కి రూ.2.75 పై యుఎంపిపి ముంద్రా 400 ఎండ్జియూలో యూనిట్ ధర0.98 పై వుంది. వీటి నుండి విద్యుత్ కొనుగోలు ధర, కమీషన్ నిర్ణయం పై ఆధారపడి ఉంది. వీటిలో కొత్త పవర్ ప్లాంట్ లో ధరలు ముంద్రా కంటే 100% ఎక్కువ ఉన్నాయి. ఎందుకు నిర్మాణ ఖర్చుల్లో తేడాలు చూపారు కాపిటల్ వ్యయం పెరగడానికి కారణం నిర్మాణ జాప్యం. పాలకుల నిర్లక్ష్యం కారణంగా పెరిగిన ఖర్చు భారం ప్రజల పై వేస్తున్నారు</p>	<p>KTPP స్థిర వ్యయాలు: TS GENCO వారు 2015-16 సంవత్సరానికి KTPP-I, KTPS-VI యొక్క స్థిర చార్జీలు రూ.1.79/KWH గా మరియు KTPP-II స్థిర చార్జీలు రూ.2.25/KWH గా అంచనాలు వేయడమైనది. KTPS-VI విద్యుత్ ఉత్పత్తి కేంద్రం 2009 లో పూర్తి అయినది, కాని KTPP-II నిర్మాణములో ఉన్నది 2015-16 సంవత్సరంలో విద్యుత్ ఉత్పత్తి ప్రారంభించబడును, 100 MW అధిక విద్యుత్ ఉత్పత్తి సామర్థ్యం, అధిక నిర్మాణ ఖర్చులు మరియు రుణాల పై అధిక వడ్డీ వలనKTPS-VI యొక్క స్థిర చార్జీలకంటే KTPP-II యొక్క స్థిర చార్జీలు ఎక్కువగా అంచనా వేయడమైనది.</p>
5.1	<p>అస్థిర ఖరీదు</p> <p>వివిధ విద్యుత్ ప్లాంట్లకు వాడేది ఒకే ఇంధనం అయినా యూనిట్ ఖరీదులలో తేడాలున్నాయి. హిందుజాకి యూనిట్ కి 1.86 పై వుంటే ఎన్.టి.పి.సి సింహాద్రి 2.60 పై కొనే ఒప్పందం వుంది. ఈ రెండు వాడేది మహానది బొగ్గే. కానీ 40% తేడా వుంది. కెటిపిఎస్-VI కి అస్థిర ఖరీదు క్రింద యూనిట్ కి 2.73 పై ఇవ్వడం కారణం చెప్పతూ, మహానది బొగ్గే కారణం చెప్పారు ప్రక్కనేవున్న సింగరేణి బొగ్గే కేటాయిస్తే తగ్గుతుంది</p>	<p>చర వ్యయాలు : KTPP-VI విద్యుత్ ఉత్పత్తి కేంద్రానికి మహానది ఫీల్డ్స్ లిమిటెడ్ నుండి బొగ్గే కేటాయింపు ఉంది, బొగ్గే యొక్క రవాణా ఖర్చులు రూ.1900/MT అదే సింగరేణి కాలరీస్ యొక్క రవాణా ఖర్చులు రూ.400/MT కంటే ఎక్కువగా ఉన్నందున KTPP-VI అధిక చర వ్యయాలు అంచనా వేయడమైనది. కేంద్ర ప్రభుత్వం ఈ బొగ్గే కేటాయింపులను పరస్పరము మార్చుకోవడానికి చర్యలు చేపడుతున్నది.</p>
5.2	<p>గ్యాస్ ధరలు పెరిగాయని గ్యాస్ ప్లాంట్లు ద్వారా కొనే విద్యుత్ కి అస్థిర చార్జీలు పెంచారు. ఇవి కూడా రూ.2.62 నుండి రూ.3.44/- గా నిర్ణయించారు. 2.62/- నిర్ణయిస్తే రిలయన్స్ విద్యుత్ యూనిట్ కి 3.44గా నిర్ణయించారు. గ్యాస్ ముందే.</p>	<p>GAIL గ్యాస్ ధరను 5.05 US డాలర్లు / MMBTUగా పెంచినందువల్ల స్థిర చర వ్యయాలు పెరిగి ఉత్పత్తి ధర కూడా పెరుగుచున్నది. భారత ప్రభుత్వం (GoI) పెట్రోలియం & సహజ వనరుల మంత్రిత్వ శాఖ</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	<p>అయినా గ్యాస్ కేటాయింపు దీని ధర కేంద్రం నిర్ణయించడం ద్వారా దీని భారం రాష్ట్ర ప్రజలు బారాయించ వలసివస్తుంది గ్యాస్ పవర్ ప్లాంట్ లు నిర్మాణం అయివున్న కాలంలో ఒప్పందం ప్రకారం గ్యాస్ ఇవ్వని కారణంగా విద్యుత్ ఉత్పత్తి కొరత ఏర్పడింది. అధిక ధరకు విద్యుత్ కొనే స్థితికి దారితీసి అదనపు భారం ప్రజల పై వేస్తున్నారు రాష్ట్ర అవసరాలు తీరిన తరువాతనే గ్యాస్ బయట రాష్ట్రాలకు ఇవ్వాలి నిర్మాణం అయిన గ్యాస్ ప్లాంట్ లకు కేంద్రం గ్యాస్ ఇచ్చే విధంగా డిస్కాంలు రంగంలో దిగాలి. కేంద్రం పై వత్తిడి తీసుకురావాలి.</p>	<p>(MoP&NG) వివిధ రంగాలకు ప్రాధాన్యత ప్రకారంగా గ్యాస్ కేటాయింపులు జరుగుతున్నవి. అదనపు గ్యాస్ కేటాయింపుల కొరకు నివేదనను TSDISCOMs తెలంగాణా ప్రభుత్వానికి తెలిపినవి. అదే విషయాన్ని తెలంగాణా ప్రభుత్వం ద్వారా పెట్రోలియం & సహజ వనరుల మంత్రిత్వ శాఖకు (MoP&NG) తెలియ పరచబడుతున్నది.</p>
6	<p>సరఫరా పంపిణీ నష్టాలు రాష్ట్ర విభజన కారణంగా సెంట్రల్ డిస్కాం పరిధిలో వున్నా కర్నూల్, అనంతపురం జిల్లా లు ఆంధ్ర లో దక్షిణ డివిజన్ విద్యుత్ పంపిణీ సంస్థకి మార్పారు. ఖమ్మంలోని 7 మండలాలు ఈపిడిసిఎల్ మార్పారు. ఈ మార్పుల కారణంగా గత మల్టిఇయర్ టారిఫ్స్ ప్రమాణాలు పునఃసమీక్ష చేయాలి. 24 గంటలు విద్యుత్ పంపిణీ కోసం కేంద్రం, రాష్ట్రం కోట్లు ఖర్చు చేసే విధానం ముందుకు వస్తుంది నష్టాలు తగ్గే అవకాశం వుంది. ఆదాయ అంచనాలు, రాబడులకు ఎందుకు తేడా వుంటుందో వివరించాలి. విద్యుత్ తయారీకి వాడే బొగ్గు అధిక రేటులో కొనడం అవసరం లేకున్నా ఖరీదైన విదేశీ బొగ్గు కొనడం వల్ల ఈ భారం ప్రజలపై వేస్తున్నారు బొగ్గు వినియోగంలో అనేక లోపాలున్నాయి. అనేక సందర్భాలలో ఎత్తిచుపాం. ఎక్కువ ఖరీదుకు విద్యుత్ కొనడం, నేడు టీ&డి నష్టాన్ని తగ్గించడానికి బదులుగా పెంచి చూపారు.తగిన సిబ్బందిని నియమించక పంపిణీలో నియంత్రణ, రెవెన్యూ</p>	<p>గౌరవ కమీషన్ ముందు 2015-16 సంవత్సరం రిటైల్ సరఫరా వ్యాపారానికి సమర్పించిన సమగ్ర ఆదాయ ఆవశ్యకత మరియు ధరల ప్రతిపాదనలో పంపిణీ నష్టాలను ఈ క్రింది విధంగా తెలియపర్చబడినవి. 2013-14 సంవత్సరానికి వాస్తవ పంపిణీ నష్టాలు 14.89% 2014-15 సంవత్సరానికి పరిగణించిన పంపిణీ నష్టాలు 13.41% 2015-16 సంవత్సరానికి పరిగణించిన పంపిణీ నష్టాలు 12.58% విద్యుత్ పంపిణీ నష్టాలను తగ్గించుటకొరకు అందుబాటులో ఉన్న చర్యలను తీసుకోవడమైనది. ఫలితంగా 2000-01 సంవత్సరం లో 30.52% గా ఉన్న పంపిణీ నష్టాలను 2013-14 సంవత్సరానికి 14.89%కు తగ్గించడం జరిగింది</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	<p>వసూళ్ళలో నిర్లక్ష్యంతో భారం పెరిగి ఈ భారాన్ని ప్రజల పై వేస్తున్నారు మన గ్యాస్ మన బొగ్గు, మన శ్రమజీవులు, మన సాంకేతిక పరిజ్ఞానం సక్రమంగా వినియోగిస్తే చార్జీలు పెంచడం కాక తగ్గించ వచ్చు పొదుపు మూలంగా ఉత్పత్తి భారం తగ్గుతుంది కాలుష్య నియంత్రణ చేయవచ్చు.</p>	
7	<p>ట్రూ అప్ గత ఖర్చులకు వివరణ లేకుండా ట్రూ అప్ విధానం పాటించడం ఏపాటి సరిఅయినది. ఈఅర్.సి అనుమతించరాదు.</p>	<p>గౌరవ కమీషన్ జారీ చేసిన రెగ్యులేషన్ ను అనుసరించి గతములో కమీషన్ ఆమోదించిన మరియు వాస్తవాలకు మధ్యగల వ్యత్యాసమును. పెరుగుదల (True-up) తగ్గుదల (True-down) రూపంలో ప్రతిపాదించడమైనది.</p>
8	<p>విద్యుత్ షాక్ తో ప్రాణ, ఆస్తి నష్టం జరుగుతుంది నివారణకు తగిన చర్యలు తీసుకోవాలి. మరణించిన వారికి కనీసం 10 లక్షలు ఎక్స్ గ్రేషియా ఇవ్వాలి. పశువులు, ఇతర జీవులు చనిపోతే వాటన్నిటిని అంచనా వేసి తగిన నష్ట పరిహారం ఇవ్వాలి. ముఖ్యంగా షాక్ నివారణా చర్యల పై కేంద్రీకరించాలి.</p>	<p>విద్యుత్ ప్రమాదాల నియంత్రణ చర్యలలో బాగా లూస్ లైన్ సరిచేయడం, మధ్య పోలులు ఏర్పాటు చేయుట, ట్రాన్స్ ఫార్మర్ వద్ద కంచె ఏర్పాటు చేయుట, ట్రాన్స్ ఫార్మర్ వద్ద ఎర్త్ ను సరిచేయడం తో పాటు విద్యుత్ ప్రమాదాల పై అవగాహన పెంపొందించే కార్యక్రమాలు చేయడం జరుగుతుంది. ఈ సంవత్సరములో 6,797 AB స్విచ్చులను మరమ్మత్తు చేయడం 4,177 middle pole లను వేయడం, 23,207 ప్రదేశాలలో లైన్ల లోని వివిధ లోపాలను గుర్తించి సరి చేయడం జరిగినది.</p>

M K Gupta, Chief Electrical Distribution Engineer, South Central Railway, IV floor, Rail Nilayam, Secunderabad – 500071

S.No	Objections / Suggestions	Reply									
1	<p>4.0 Proposed Railway Traction tariff : Traction tariff has been proposed in two parts i.e. Rs. 370.17 per KVA as demand charges & Rs. 7.65 per KVAh of energy (equivalent to average of Rs. 8.94 per unit approx.) instead of existing single part tariff of Rs. 6.36 per KVAh of energy.</p> <p>4.1 It is submitted that the Railway traction tariff before converted to single part in January 1992 Railway traction tariff and HT-I tariff were same. While converting the Railway traction tariff from two part to the single part the element of demand charges were included in the energy charges and, thereafter, the traction tariff was fixed up. The DISCOM's decision about implementation of two part tariff for Railway traction of Rs. 370.17 per KVA & Rs. 7.65 per KVAh is not based on realistic study which may be seen and appreciated from the facts and figures given below.</p> <table border="1" data-bbox="348 959 1073 1312"> <thead> <tr> <th data-bbox="348 959 747 1149">Year</th> <th data-bbox="747 959 926 1149">Demand charges Rs per KVA</th> <th data-bbox="926 959 1073 1149">Energy Charges Rs per unit</th> </tr> </thead> <tbody> <tr> <td data-bbox="348 1149 747 1214">2014-15</td> <td data-bbox="747 1149 926 1214">Nil</td> <td data-bbox="926 1149 1073 1214">6.36</td> </tr> <tr> <td data-bbox="348 1214 747 1312">Proposed in the year 2015-16</td> <td data-bbox="747 1214 926 1312">370.17</td> <td data-bbox="926 1214 1073 1312">7.65</td> </tr> </tbody> </table> <p>The energy charges is already increased by 20% and in addition to that traction tariff has been proposed in two</p>	Year	Demand charges Rs per KVA	Energy Charges Rs per unit	2014-15	Nil	6.36	Proposed in the year 2015-16	370.17	7.65	<p>Due to the increase in average cost of service from Rs.5.25/Unit as approved in Tariff Order 2013-14 to Rs.5.90/Unit as filed in ARR for FY2015-16 for TSPDCL, the Licensee is obligated to increase Tariff nominally for FY2015-16.</p> <p>The increase in CoS is mainly because of increase in Power Purchase cost, increased Network Cost, considering of gains/losses upto FY2013-14 and considering of Revenue deficit for the Retail Supply business for FY2014-15.</p> <p>Increase in the power purchase cost and corresponding cost of service lead to a revenue gap of Rs.3512 crore for the FY2015-16. To reduce this revenue gap, the licensees are undertaking several energy conservation and loss reduction activities. But, without realistic revision in tariffs, these steps would fall short in bridging the revenue gap. Hence the licensees propose the tariff revisions.</p>
Year	Demand charges Rs per KVA	Energy Charges Rs per unit									
2014-15	Nil	6.36									
Proposed in the year 2015-16	370.17	7.65									

	<p>parts and demand charges of Rs.370.17/KVA/Month which is equivalent to Rs.1.29/ unit is enormously increased.</p> <p>As already brought out earlier, additional burden for the Railways is to the tune of Rs. 2.58 per unit and increase of 40.57% with respect to the previous year. As such, Hon'ble TSERC may kindly review imposition of two part tariff for the Railway traction and the corresponding increase.</p>	
<p>5.0</p> <p>5.1</p>	<p><u>Tariff Structure of Railway traction :</u> In fact the Railway traction tariff was a two part tariff till 31.12.1991 and was converted to the single part tariff from 1.1.1992 onwards considering the requirements and prolonged correspondence with the then APSEB. Single part tariff avoided complications of the actual demand recorded versus demand that gets imposed due to unavoidable feed extension from adjacent traction sub-station arising from:</p> <ul style="list-style-type: none"> i) Failure of 132 KV incoming supply. ii) Maintenance/Outage in transmission lines and other equipments. <p>The system of single part tariff has worked satisfactorily and no issue has been raised by the then APSEB and DISCOMs from 1992 to till date.</p> <p>For any given level of train services the overall demand on the system will not change. If it increases at one traction sub station it will reduce at the adjacent traction sub station as the trains move on. Reverting to two part tariff for the Railway traction as now proposed during the year 2015-16 will cause earlier complications to resurface, where load of one substation gets transferred to other substation due to one or the other reason and in turn recorded maximum demands shoots up temporarily;</p>	<p>The demand charges are meant for meeting the costs involved for making the availability of the require power in MW/MVA at the premises of the consumer round the clock. Demand charges include the fixed cost of network involved in transmitting the power and the fixed cost of the generators which have contract with the licensees to generate that power.</p>

since there is no change in the working system. Single part tariff is indeed the most appropriate tariff for the Railway traction.

6.0 Cost of Service for Railway Traction:

The proposed Cost of service for Railway Traction for 2015-16 is as follows:

Discom	Cost of Service Rs/KWH
TSSPDCL	5.07
TSNPDCL	5.33
Average	5.20

The COS is being calculated in terms of KWh and energy is being charged for Railway traction in terms of KVAh.

The comparison of cost of service for Railway traction and tariff for Railway traction (HT-V category) is given below.

Cost of Service for Railway traction				Traction tariff Rs/KVAh	
Year	TSSPDCL Rs/KWh	TSNPDCL Rs/KWh	Average Rs./KWh	Demand charges Rs./ KVA month	Energy charges Rs.KVA h
2013-14	4.82	4.92	4.87	Nil	6.36
2015-16	5.07	5.33	5.2	370.17	7.65
Variation from 2013-14 to 2015-16	5.19%	8.33%	6.78%	40.57% Equivalent to Rs. 8.94/KVAh	

From above, it may be seen that the traction tariff is

With regard to the comparison of CoS w.r.t. the Tariff, it is to inform that the **the tariff need not be the mirror image of actual cost of supply or voltage-wise cost of supply.**

The Hon Tribunal in various appeals held as under “**However, we are not suggesting that the tariffs should have been fixed as mirror image of actual cost of supply or voltage-wise cost of supply or that the cross subsidy with respect to voltage-wise cost of supply should have been within ±20% of the cost of supply at the respective voltage of supply.** The legislature by amending Section 61(g) of the Electricity Act by Act 26 of 2007 by substituting ‘eliminating cross subsidies’ has expressed its intent that cross subsidies may not be eliminated.

	<p>enormously increased by 40.57% over existing tariff and where as the cost of service increased only 6.78% tariff which is highly unjustified.</p> <p>It is also brought to your kind notice, it may be seen that the traction tariff (Equivalent to Rs. 8.94/Kvah) is higher by 72% over average cost of service (rs. 5.20/Kwh) which is against to National Tariff policy</p>	
<p>8.0</p>	<p><u>Comparison of Traction Tariff with HT-I category:</u> The proposed tariff for HT-1 category - 132 KV (Industries) for the year 2015-16 is Rs. 370.17 /KVA/Month as demand charges and Rs. 5.12 per KVAh and equivalent to Rs.5.98 per unit approximately (Details of calculations enclosed in Annexure-I).</p> <p>The proposed Railway traction tariff of Rs. 8.94 per unit is substantially higher than the HT-1 category by Rs.2.96 paise (49.5%) despite the fact that both are availing supply at same voltage level. As brought out in Para 3.0, the Railway draws substantial supply during off peak period also, thus helping in improving base load and supporting the grid stability. Charging of such higher tariff from Railway is irrational and unjustified. The Railways being a public utility organization, charging at unreasonably higher rates is unjustified.</p> <p>It is also submitted that before the tariff was converted to single part in January 1992, the Railway traction tariff and HT-I tariff were same. The revision which took place has exempted Railway traction from the demand charges but resulted into a higher tariff than tariff for HT-I category due to load pattern of Railways. The same trend is continued till now and Railway traction tariff is being fixed always higher than HT- I category.</p> <p>The DISCOM's decision about implementation of two part</p>	<p>Distinction between various consumers is as per the section 62(3) of the Act such as "load factor, power factor, voltage, total consumption of electricity etc. When the differentiation is based on the factors postulated in sub-Section (3) of Section 62 of the Act, the distinction cannot be challenged. The consumers falling in different categories cannot claim to be treated alike. Hence, the distinction between the Railways and the Industrial Consumers cannot be made.</p> <p>Further it is pertinent to mention here that Railways is not being subjected to power cuts which are imposed on other similarly placed HT consumers during FY 2012-13 and FY 2013-14. Power cuts are around 30% during normal hours and upto 90% during peak hours. The benefit to the Railways by way of exemption in power cuts cannot be measured in monetary terms but undoubtedly it is huge. Further Time of Day (ToD) tariff for HT consumers has been in vogue in the state. Under this scheme of tariff, consumers are liable to pay Rs 1 per unit is levible on energy consumption during the period from 6.00PM to 10.00 PM. The Railways is also exempted from this Time of Day tariff and gets supply at normal rate for usage of power through out the day. Thus, the Railways are benefited from supply side as compared to the other HT consumers as they are enjoying the uninterrupted power supply.</p>

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

Details of Railway traction tariff HT –I Industry

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

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

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

Fixation of higher tariff for Railway traction is also in violation to the provisions of Article 287 (b) of Constitution of India which categorically stipulates that “the price of electricity sold to the Government

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

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

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

of India for consumption by that Government or to any such Railway company as aforesaid for consumption in the construction, maintenance or operation of any Railway, shall be less by the amount of the tax than the price charged to other consumers as a substantial quantity of electricity”.

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

Category	Supply available	Type of Industry	Organization	Effect on environment	Pro. tariff for 2015-16
Ferro Alloys	132 KV	Power Intensive	Production oriented	--	Rs.4.84
Railway Traction	132 KV	Power Intensive	Public service	Energy efficient and eco friendly	Rs.8.94 (Equivalent to Rs.370.17/ KVA &Rs.7.65/K VAh)

Except load factor, Ferro Alloys has no other advantages

The Hon Commission under Sub-section 3 of Section 62 of the 'Act' while determining the tariff has been empowered to treat the consumers differently on the basis of the load factor, power factor, voltage, total consumption of electricity during any specified period or the time at which the supply is required or the geographical position of any area, nature of supply and ***the purposes for which the supply is required.***

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

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

	<p>over Railways. Contribution of Railways to economic and social developments of country far outweighs the higher load factor of Ferro Alloys. It is brought to the kind notice of commission that load factor of Railways is showing an upward trend due to introduction of <u>intermediate block section</u> with the help of IB signals. This enables running of more trains and hence higher load factor.</p> <p>Hon'ble commission is requested to critically examine the preferential treatment / subsidy given to Ferro Alloys which is unjustifiable and against basic principles of Electricity Act 2003 (section 61).</p>	
<p>10.0</p>	<p><u>Extension of Subsidy to certain categories – Request for Deletion:</u> Section 61(g) of Electricity Act 2003 stipulate that “the tariff progressively reflects the cost of supply of electricity, and also reduces and eliminates cross-subsidies within the period to be specified by the appropriate commission.”</p> <p>From the cost of service and tariff models of the various DISCOMs, it is noted that certain categories have been heavily subsidized and the cross subsidy is charged to other consumers like Railways. This needs to be eliminated as per the stipulation under Section 61 (g) of the Electricity Act, 2003.</p> <p>Hon'ble Commission is requested to fix tariff reasonably for HT-V category. Cross-subsidy element being charged heavily to Railways is unjustified and as it is required to be reduced to zero gradually.</p>	<p><i>The section 61 (g) of the E.Act-2003 is amended by Act 26 of 2007 wherein the word elimination of cross-subsidies was removed and the same is reproduced here “the tariff progressively reflects the cost of supply of electricity, and also reduces the cross-subsidies in the manner specified by the appropriate commission.”</i></p> <p>The legislature by amending Section 61(g) of the Electricity Act by Act 26 of 2007 has expressed its intent that cross subsidies may not be eliminated.”</p>
<p>11.0</p>	<p><u>Discrimination against Railway traction :</u> According to ARRs of Discoms while proposing the tariffs</p>	

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

	<p>progress in newly formed Telangana and another 563 Route Kms of section is sanctioned for electrification in recent budget</p> <p>Higher traction tariff slashes Rate of Return (ROR) for the electrification projects and making them non-viable.</p> <p>Hon'ble commission is requested to consider the above and fix traction tariff reasonably. A view can be taken by commission for adopting a rebate of 10% of energy charges for 5 years from date of commissioning of new electrification projects as done in MP state.</p>	
	<p>13.0 <u>Effect of increase in traction tariff:</u></p> <p>One paise increase of traction tariff results in additional burden to the tune of Rs. 0.62 Crore per annum (622 M.Units X Rs 0.01).The proposed increase will cause additional burden for the Railways to the tune of Rs. 160 crores per annum with the increase of Rs. 2.58/unit (40.57%).</p> <p>Hon'ble TSERC may kindly review imposition of two part tariff for the Railway traction and the corresponding steep increase.</p>	
	<p><u>Incentive on Prompt/early payment:</u></p> <p>Railways are prompt in payment of energy bills to the DISCOMs and for these, Railways certainly deserve some rebate/incentive. Reasonable rebate/incentive for prompt payment be granted as done by other SERC viz. MERC, OERC, MPERC etc</p>	<p>Not in the purview of the Licensee</p>
	<p><u>CONCLUSION:</u></p> <p>From the foregoing paragraphs, it is evident that the</p>	

proposed tariff of Railway traction at Rs. 8.94 for 2015-16 is unreasonably high and highly unjustified, causing additional burden on a public utility like Railway of Rs. 160 crores approx.

Hon'ble Commission is requested to keep in view the following **statutory provisions** while fixing the tariff for 2015-16:

- (i) The Electricity Act 2003 vide Section 61(g) stipulates that "the tariff progressively reflects the cost of supply of electricity and also, reduces and eliminates cross-subsidies within the period to be specified by the Appropriate Commission".
- (ii) The Electricity Act 2003 vide Section 45 (4), stipulates that "Subject to the provisions of section 62, in fixing charges under this section a distribution licensee shall not show undue preference to any person or class of persons or discrimination against any person or class of persons.
- (iii) National tariff policy para 8.3 (2) states that "for achieving the objectives that the tariff progressively reflects the cost of supply of electricity, the SERC would notify roadmap within six months with a target tht latest by the end of year 2010-11 tariffs are within \pm 20% of the average cost of supply. The road map would also have intermediate milestones based on the approach of a gradual reduction in cross subsidy."
- (iii) Article 287 (b) of Constitution of India categorically stipulates that "the price of electricity sold to the Government of India for consumption by that Government or to any such Railway company as aforesaid for consumption in the construction, maintenance or operation of any Railway, shall be less by the amount of the tax than the price charged to other consumers as a substantial quantity of electricity".
- (iv) The tariff needs to be fixed near to cost of service as per National Tariff Policy. The present railway traction tariff for 2014-15 is Rs. 6.36 per unit, which is already higher by

about 22.31% than the average cost of service of the two DISCOMs. Thus it is highly justified that the tariff is not increased further and rather reduced from the same level.

- (v) The tariff proposed for HT-I (B) Ferro Alloys units at Rs 4.84 per unit (Single part tariff) being a power intensive unit where as railway traction tariff is Rs. 370.17 /KVA/Month (Demand charges) and Rs. 7.65/KVAh per unit equivalent to Rs. 8.94 /unit is higher by 85 % despite of power intensive and public serving unit.
- (vi) Apart from these the Railway traction provides base load, maintained high power factor, and save imported precious oil, apart from speedy, energy efficient and environmental friendly public transport.
- (vii) Encouragement for new electrified sections for development of infrastructure in newly formed Telangana particularly and also act as growth engine for the economy of country largely.
- (viii) Reasonable rebate/incentive for prompt payment be granted as done by other SERC viz. MERC, OERC, MPERC etc.

2015-16 సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు ప్రతిపాదిత ఛార్జీల పై యన్. వేణుగోపాల్ రెడ్డిగారి

అభ్యంతరముల / సూచనలకు సమాధానములు

చిరునామ: 28-6-202, ద్వారకా నగర్, హంటర్ రోడ్, హనుకొండ, వరంగల్ (జిల్లా) తెలంగాణ రాష్ట్రం

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
1.	విద్యుత్ పొదుపు	వినియోగదారుని విద్యుత్ బిల్లు లపై విద్యుత్ పరిరక్షణ నినాదాలు ముద్రించడం. సబ్-స్టేషన్ కమిటీ సభలు రైతు చైతన్య యాత్రలు, కర పత్రాల పంపిణీ ద్వారా పొదుపు చర్యలను ప్రచారం చేయబడుతున్నది.
2.	విద్యుత్ డిమాండ్ ను తగ్గించడం	పెరుగుతున్న విద్యుత్ అవసరాలకు అనుగుణంగా విద్యుత్ డిమాండ్ పెరుగుతుంది
3.	ప్రత్యేక ఫీడ్లు	గ్రామాలకు ప్రత్యేక వ్యవసాయ ఫీడ్లు ఏర్పాటు చేయడానికి చాలా ఖర్చు అవుతుంది. అయినప్పటికీ ప్రత్యేక లైన్ లు వేయడం ద్వారా వ్యవసాయ ఫీడ్ లను వేరు పరచడం గురించి లైసెన్సీ వారు పరిశీలన చేస్తున్నారు
4.	క్షేత్ర స్థాయి నిర్వహణ సామర్థ్యం పెంచడము	తగు చర్య తీసుకుంటాం
5.	అందరికీ మీటర్లు బిగించాలి	DPE వారు ఇంటెన్సివ్ ఇన్స్పెక్షన్ నిర్వహించి అక్రమ కనెక్షన్లను క్రమబద్ధి కరిస్తున్నారు
6.	ఉచిత కరెంటు ఎత్తి వేయాలి	ప్రభుత్వం వారి పాలసీ ప్రకారం మరియు గౌరవ కమిషన్ వారి టారిఫ్ ఆర్డర్ ప్రకారం, వ్యవసాయ వినియోగ దారులకు ఉచిత విద్యుత్ ఇవ్వడం జరుగుతున్నది.
7.	24 గంటలు నాణ్యమైన కరెంటు ఇవ్వాలి	విద్యుత్ సరఫరా మరియు డిమాండ్ కు మధ్య వ్యత్యాసం దృష్టిలో ఉంచుకొని

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
		విద్యుత్ వ్యవస్థను () సమర్థవంతంగా నిర్వహించుటకుగాను వ్యవసాయ విభాగానికి రోజుకు 6 నుండి 7 గంటల విద్యుత్ సరఫరాను రెండు పర్యాయాలుగా అందిస్తూ అందులో ఒక దఫా ఉదయం వేళలో అందించడం జరుగుతున్నది.

Replies to the Objections / Suggestions raised on ARR & FPT for FY 2015-16 of Sri Addanki Dayakar, Q.No.B-78, Patigadda, Secunderabad

Sl.No.	Objections / Suggestions	Reply
	Regarding surplus power	<p>TSDISCOMS have projected the energy availability from various energy sources as per the AP Reorganisation Act and as per best estimates of parameters like coal availability, maintenance schedules, PLF etc. from existing stations as well as upcoming stations of Andhra Pradesh like Krishnapatam, Hinduja etc. If these stations achieve CoD as per the projection of ARR and share power with Telangana as per AP Reorganisation Act, this would result in the Energy surplus scenario as projected in the ARR</p>
	Vigilance on electricity	<p>The following Anti-Theft measures were carried out by DPE wings of Warangal, Karimnagar, Khammam, Nizamabad & Adilabad to curb theft of energy.</p> <ol style="list-style-type: none"> 1. Theft prone areas were identified and conducted surprise raids for detecting Theft. 2. Services were inspected on 11 kv feeder wise where the energy losses are on high side in Town/Mandal headquarters. 3. Exceptional services like Nil consumption, abnormal low consumption, UDC, Bill Stopped etc were inspected. 4. Early and Evening hours raids are done to detect Direct Tapping and Loops in meters 5. Seasonal Industries were inspected and proposed Development charges for additional loads. 6. Pole to Pole and Intensive inspections were conducted along with Operation and APTS wing. 7. Special Intensive inspections on High Loss 11 kv feeders were conducted with inter- circle DPE teams. <p>In implementation of the above action plan, the following progress was made during the year 2014-15 i.e., 04/2014 to 02/2015 by DPE wings of TSNPDCL.</p>

Sl.No.	Objections / Suggestions	Reply																																
		<p style="text-align: right;">(Rs. Lakhs)</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th rowspan="2" style="text-align: center;">Total Services Inspected</th> <th colspan="2" style="text-align: center;">PE</th> <th colspan="2" style="text-align: center;">MP</th> <th colspan="2" style="text-align: center;">BB</th> <th colspan="2" style="text-align: center;">DC</th> <th colspan="2" style="text-align: center;">Total</th> </tr> <tr> <th style="text-align: center;">Nos.</th> <th style="text-align: center;">Amount</th> <th style="text-align: center;">Nos.</th> <th style="text-align: center;">Amount</th> <th style="text-align: center;">Nos.</th> <th style="text-align: center;">Amount</th> <th style="text-align: center;">Nos.</th> <th style="text-align: center;">Amount</th> <th style="text-align: center;">Nos.</th> <th style="text-align: center;">Amount</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">142085</td> <td style="text-align: center;">15075</td> <td style="text-align: right;">568.869</td> <td style="text-align: center;">1134</td> <td style="text-align: right;">147.852</td> <td style="text-align: center;">213</td> <td style="text-align: right;">424.378</td> <td style="text-align: center;">2744</td> <td style="text-align: right;">227.162</td> <td style="text-align: center;">19166</td> <td style="text-align: right;">1368.261</td> </tr> </tbody> </table>	Total Services Inspected	PE		MP		BB		DC		Total		Nos.	Amount	Nos.	Amount	Nos.	Amount	Nos.	Amount	Nos.	Amount	142085	15075	568.869	1134	147.852	213	424.378	2744	227.162	19166	1368.261
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142085	15075	568.869	1134	147.852	213	424.378	2744	227.162	19166	1368.261																								
	Electrical shocks	Every effort is being made to avoid accidents, by taking up regular maintenance works like replacement of conductor, providing of inter poles , maintains of DTRs structure and LT lines, providing of earthing. Wide publicity being given requesting Ryots not to meddle with Distribution Transformers.																																
	Why Govt. increasing capital in Govt. Companies	Not in the purview of the discoms																																

Replies to the Objections / Suggestions raised on ARR & FPT for FY 2015-16 of Sri Gundlapally Sreenu Mudiraj,

6-1-1777, C-94, Hill Colony, Vanasthalipuram, Hyderabad

Sl.No.	Objections / Suggestions	Reply
	Please allow me to participate in person on behalf of Mudiraj Research Center	It is not under the purview of the Discoms

**Replies to the Objections / Suggestions raised on ARR & FPT for FY 2015-16 of Sri SMS Rao,
Co-Head Groups Co-ordinator, Aam Aadmi Party (Telangana State) OPP : GHMC, Liberty X-Roads, Hyderabad**

Sl.No.	Objections / Suggestions	Reply
	Grant a permission to us to give our party opinion on power tariff for the year of 2015-16 in public hearing day (i.e., 13 or 14 th of March 2015)	It is not under the purview of Licensee

2015-16 సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు ప్రతిపాదిత ఛార్జీల పై D.రాము, గారి

అభ్యంతరముల / సూచనలకు సమాధానములు

చిరునామ: 3-1-175, రాజ్ పుట్ రెసిడెన్సీ, నల్లకుంట, హైదరాబాద్ తెలంగాణ రాష్ట్రం

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
1.	టోల్ ప్రీ నంబరు పని విధానం గురించి అనుమానాలు అమలు రావటానికి ఏమిచేస్తారు	పరిశీలించి తగు చర్యలు తీసుకోవబడును
2.	విద్యుత్ మరణాలు తగ్గించడం కొరకు మీరు ఏమి ప్రయత్నాలు చేస్తారు చేసినారు.	లైసెన్సీవారు విద్యుత్ప్రమాదాలు జరుగుకుండా అనేకవిధమైన చర్యలు తీసుకోవడం జరుగుతోంది. అందులో భాగంగా కండక్టర్లను మార్పడం, లైనులమధ్య స్తంభాలు ఏర్పర్చడం, ట్రాన్స్ఫార్మర్ల రియు ఎల్.టీ. లైనులను నిర్వహించడం, ఎర్లింగ్ మకూర్చడం మొదలగు నిత్యకృత్యమైన నిర్వహణపనులు చేయుబడుచున్నవి. రైతులు ట్రాన్స్ఫార్మర్ల నిర్వహణలో జోక్యంచేసుకోకుండా వుండుటకై విస్తృతప్రచారం చేయడం జరుగుతుంది.
3.	DTR కాలిపోయిన రిపేర్ విధానం సిబ్బంది వైపు నుండి జరగడం లేదు. రైతులే చేసుకొంటున్నారు. దీని పరిష్కారం ఏమిటి. ఏ విధంగా చేస్తారు	చెడిపోయిన డిస్ట్రి బ్యూసన్ ట్రాన్స్ ఫార్మర్ ను నిర్ణీత సమయంలో మరమ్మతులు చేసి వినియోగదారునికి మెరుగైన సేవలను అందించుటకు లైసెన్సీ ఎప్పటికప్పుడు సమీక్షించుకొని తదనుగుణంగా చర్యను చేపట్టడం జరుగుతున్నది.
4.	వ్యవసాయానికి పగలు ఎప్పటి నుండి ఇస్తారు	విద్యుత్ సరఫరా మరియు డిమాండ్ కు మధ్య వ్యత్యాసం దృష్టిలో ఉంచుకొని విద్యుత్ వ్యవస్థను () సమర్థవంతంగా నిర్వహించుటకుగాను వ్యవసాయ విభాగానికి రోజుకు 6 నుండి 7 గంటల విద్యుత్ సరఫరాను రెండు పర్యాయాలుగా

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
		అందిస్తూ అందులో ఒక దఫా ఉదయం వేళలో అందించడం జరుగుతున్నది.

Replies to the Objections / Suggestions raised on ARR & FPT for FY 2015-16 of Sri Md. Munawar Chand,

1-4-298, Bholakpur, Musheerabad, Hyderabad

Sl.No.	Objections / Suggestions	Reply
	Unknown charges in the bill. More interest. Quality power supply	There are no unknown charges in the bill. The billing is made as per the terms and conditions of the tariff order. Delay Payment Surcharge is being levied as per the Tariff Order. Voltages and quality of power supply to consumers is closely monitored from corporate office level whenever the complaint is received regarding low voltages and poor quality of supply. Everyday 11KV feeder wise electricity supply details are received from field on the same day night hrs and will be reviewed regularly.

Replies to the Objections / Suggestions raised on ARR & FPT for FY 2015-16 of Sri KRC Reddy,

287, Singareni Colony, PO: Vaishali Nagar, Hyderabad

SI.No.	Objections / Suggestions	Reply
	<p>Whether capacitor banks are installed for agriculture load substations. Energy that can be saved district-wise and financial impact.</p>	<p>A drive has been conducted in TSNPDCL for installation of Capacitors to Agl pump sets. Further, while releasing of services it is ensured that the farmers follow DSM measures then only they are made eligible for free category. However 282 capacitors of 2 MVAR were already in use in the existing substations. 169 capacitors of 2/1 MVAR work is under progress.</p>
	<p>Whether energy meters are installed for all the transformers providing for agricultural loads in all districts. This is required to assess the actual energy consumption for agriculture in the state.</p>	<p>Agl consumption estimation in TSNPDCL is being carried-out on the basis of ISI Methodology wherein energy meters are provided to the selected DTRs (Sampled DTRs) and the average consumption recorded in a given capacity of the DTR is calculated. This average consumption multiplied by the total number of the same capacity DTRs will be the total Agl consumption on the capacity of DTRs. Similarly, the total Agl consumption on the other capacities of DTRs is arrived. The total Agl consumption on all the capacities of DTRs (16 KVA, 25 KVA, 63 KVA & 100 KVA) will be the total Agl consumption estimation in TSNPDCL.</p> <p>In TSNPDCL, the total number of Agl DTRs of the capacities said above, is 1,28,011. Out of the, energy meters were provided on 3,168 DTRs of the above said DTRs. The readings from these energy meters are taken every month and arriving monthly Agl consumption estimation.</p> <p>Also, it is planned to provide energy meters to 10% of the total</p>

SI.No.	Objections / Suggestions	Reply
		existing Agl DTRs and hence the accuracy of Agl consumption estimation will be improved further.
	What steps are taken to reduce the expenditure at the state level for purchasing power by the discoms. Which is about 76% of the energy cost.	The Discoms are putting all efforts to buy cheaper power through the process of transparent bidding process.
	What are the steps taken by discoms on energy conservations front.	The Government has constituted a State Energy Conservation Mission for monitoring of energy conservation activities. The licensees are also undertaking several loss reduction measures like HVDS implementation, energy audit, replacement by high quality meters, laying of AB Cables, etc to reduce both the technical and commercial losses

2015-16 సంవత్సరానికి సమగ్ర ఆదాయ ఆవశ్యకత మరియు ప్రతిపాదిత ఛార్జీల పైడాక్టర్ పి. రామ దేవి,, గారి

అభ్యంతరముల / సూచనలకు సమాధానములు

చిరునామ: F.No.802, సాయి నగర్ హైట్, దళిగడ్డ కాలనీ, బేగుంపేట్, హైదరాబాద్ తెలంగాణ రాష్ట్రం

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
1.	<p>విద్యుత్ మరణాల విషయము లో మన రాష్ట్రం అధికంగా జరుగుతున్నాయి. గత సంవత్సరం 436 ఐతే 2015-16 216 గా మీరు ఇవ్వడం జరిగింది. ఈ విధంగా మరణించిన వారికి ఎక్స్ గ్రేషియా లక్ష నుండి రెండు లక్షల వరకు పెంచారన్నారు. కాని rail accident లో చనిపోయిన వారికి 5 లక్షలు ఇస్తున్నారు ఈ మరణాలకు బాధ్యత ప్రభుత్వానిదే కాబట్టి 5 లక్షలు ఇవ్వటమే కాకుండా గాయపడిన వారికి కూడా తప్పనిసరిగా ఆర్థిక సహాయము చెయాలని.</p>	<p>గత సంవత్సరంలో అనగా 2013-14 విద్యుత్ ప్రమాదాల వలన 159 మంది మరణించారు మరియు 2014-15 నందు ఫిబ్రవరి నెల వరకు 156 మంది మరణించారు.</p> <p>గౌరవ కమీషన్ వారి ఆదేశాల మేరకు సిబ్బందేతర విద్యుత్ ప్రమాదాలకు గురి అయి మరణించిన యెడల మనుష్యులకు రూ.2,00,000-00 మరియు పశువులకు రూ.20,000-00 చొప్పున ఎక్స్ గ్రేషియా శాఖ పరమైన విచారణ అనంతరం మరణించిన వారి కుటుంబ సభ్యులకు అందించడం జరుగుతుంది..</p>
2.	<p>ఎడైతే 5.6% charges పెరిగాయో వాటికి ఎన్నో రూపాలు ఉంటే దానికి ప్రజల మీద రుద్దడం చాలా అమానుషము మీరు ఎడైతే 282 కోట్లు మీరు తీసుకున్న 2,450 కోట్లకు వడ్డీని ప్రజల మీద రుద్దటం దీని విషయంలో ప్రభుత్వం ఆలోచించాలి.</p>	<p>సెంట్రల్ గవర్నమెంట్ వారు ఆర్థిక పునర్నిర్మాణ ప్రణాళిక లో పేర్కొన్న అంశాల లో సఫలీకృతం అయిన బట్టి, ఫైనాన్సు పరివర్తన విధానం (Transitional Finance Mechanism) ద్వారా ఆర్థిక పునర్నిర్మాణ ప్రణాళిక (ఫ) తోడ్పాటు అందిస్తారు. ఫైనాన్సు పరివర్తన విధానం (Transitional Finance Mechanism) లో క్రింది అంశాలు కలవు.</p> <p>1. RAPDRP కింద పేర్కొన్న నష్టాలు కంటే AT & C నష్టం తగ్గింపు</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
		<p>ద్వారా ఆదా చేసిన అదనపు శక్తి విలువకు సమానంగా గ్రాంట్ రూపంలో ద్రవ్యత మద్దతు అందించడం.</p> <p>2.రాష్ట్ర ప్రభుత్వం తీసుకున్న బాధ్యత (liabilities)లో 25% మూల ధనాన్ని చెల్లించడం ద్వారా ప్రోత్సాహకాన్ని ఇవ్వడం.</p> <p>FRP స్కీం లోని అంశాలు</p> <ol style="list-style-type: none"> 1.టారిఫ్ సెట్టింగ్ మరియు రెవిన్యూ రియలైజేషన్ 2. అఫ్ సబ్సిడీ 3. మీటరింగ్ మెజర్స్ 4. ఆడిట్ అఫ్ అకౌంట్స్ 5.ఫైనసియల్ పెర్ఫార్మన్స్ ఇంప్రూవ్మెంట్

Replies to the Objections / Suggestions raised on ARR & FPT for FY 2015-16 of Sri P. Padma

1-1-385/12/17/1, Praneav Residency, 304, New Bakaram Gandhi Nagar, Hyderabad

Sl. No.	Objections / Suggestions	Reply
	Don't hike electricity charges	<p>In the Tariff Order for FY 2013-14, the average Cost to Serve (CoS) as approved by the Hon'ble Commission for the Telangana was Rs 5.46/Unit. Since then, there has been a significant increase in the average CoS during the year and the licensee expects the trend to continue for the ensuing year.</p> <p>The Licensee estimates the state level CoS for the year FY 2015-16 to be at Rs. 5.98/Unit. This implies that an increase of Rs.0.52/ Unit (10 % increase)</p> <p>The increase in the CoS is due to the following reasons</p> <ol style="list-style-type: none"> 1. The Network cost approved in FY 13-14 was Rs. 0.83/Unit and this has increased to Rs. 1.00 /Unit primarily due to increase in wages of employees, increased Capital Investment of the licensee. 2. The interest costs on the short term loans converted to Long term loan under Financial Restructure plan amounts to Rs. 141 crores has also increased the ARR in FY 2015-16. 3. The Licensees has projected a consolidated revenue deficit for FY 13-14 and FY 14-15 to the tune of Rs. 1463 Crs. The high revenue deficit for the period is primarily due to increase in Power Purchase cost, Network cost and other cost in FY 14-15 and no tariff revision in FY 14-15.
	Capacitors should be fixed by Govt. to small marginal farmers	<p>A drive has been conducted in TSNPDCL for installation of Capacitors to Agl pump sets. Further, while releasing of services it is ensured that the farmers follow DSM measures then only they are made eligible for free category.</p> <p>However 282 capacitors of 2 MVAR were already in use in the existing substations.</p> <p>169 capacitors of 2/1 MVAR work is under progress.</p>

Sl. No.	Objections / Suggestions	Reply
	5 lakhs ex-gratia for electricity shock death	As per directions of APERC (Proceeding No.APERC/Secy/EAS/S-101/177/2013, Dt13.08.2013), the NPDCL has enhanced existing ex-gratia amount in case of fatal accidents to non departmental person and animals due to electrocution i.e. Human being from Rs.1 to 2 Lakhs, cattle from RS. 3,000 to Rs. 20,000 and goat and sheep @ Rs.4,000 respectively and sanction procedure is simplified to grant ex-gratia to victims irrespective of the mistake from any side. Further online tracking of accidents taken place in TSNPDCL and reports submission is commenced from 12/2014 to see that all eligible victims receive compensation at the earliest.
	Minimize cost of production of electricity and supply for low charges to poor people	Cost of supply mainly depends on the power purchase cost. As it is increasing year on year, it is inevitable for the Discom to enhance the tariffs. However taking into consideration of the poor people Discoms have not proposed any increase for the domestic consumers with consumption below 100 units and agriculture consumers. For other consumers also Discom proposed a minimal increase in tariffs .
	Free electricity to small and marginal farmers.	As per the Government policy and the Tariff Order issued by the Hon'ble Commission, the free supply is extending to farmers.

G - గ్రూప్ : అభ్యంతరముల / సూచనలకు సమాధానములు

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
1.	<p>TS విద్యుత్ నియంత్రణ మండలి లో ఆంధ్ర ఉద్యోగులను తీసుకోవడం జరిగింది. తెలంగాణా నిరుద్యోగులకు అన్యాయం జరగడమే కాకుండా విద్యుత్ నియంత్రణ మండలి తీసుకొన్న నిర్ణయం కూడా కఠిన వైఖరి కూడా ముందే వారు ఆంధ్ర వారికి తెలియ చేసే అవకాశం ఉంటుంది. కావున ఆంధ్ర ఉద్యోగులకు దంపతుల పేరున ఇతర పేరున తీసుకున్న వారి విషయం క్షుణ్ణంగా పరిశీలించి తగు నిర్ణయం తీసుకోగలరని విద్యుత్ నియంత్రణ మండలి వారిని ప్రార్థిస్తున్నాను</p>	<p>లైసెన్స్ పరిధిలో లేని అంశం.</p>

ప్రతి సెక్షన్ కార్యాలయంలో వ్యవసాయ బావుల ఆర్డీలను జ్యేష్ఠత (seniority) ప్రకారం మంజూరు చేయడం జరుగుతుంది. ప్రభుత్వ వ్యవసాయ బావుల కనెక్షన్ లక్ష్యంకు (target) అనుగుణంగా మరియు సెక్షన్ కార్యాలయంలో ఉన్న వ్యవసాయ బావుల జ్యేష్ఠత (seniority) ఆధారంగా సర్వీసును మంజూరు చేయడం జరుగుతుంది.

విద్యుత్ సరఫరా మరియు డిమాండ్ కు మధ్య వ్యత్యాసం దృష్టిలో ఉంచుకొని విద్యుత్ వ్యవస్థను () సమర్థవంతంగా నిర్వహించుటకుగాను వ్యవసాయ విభాగానికి రోజుకు 6 నుండి 7 గంటల విద్యుత్ సరఫరాను రెండు పర్యాయాలుగా అందిస్తూ అందులో ఒక దఫా ఉదయం వేళలో అందించడం జరుగుతుంది.

DTR లన్నిటికీ AB switch లను ఏర్పాటు చేయడం జరుగుతుంది.

H - గ్రూప్ :అభ్యంతరముల / సూచనలకు సమాధానములు

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
1.	<p>LT-VA వ్యవసాయ కనెక్షన్ కు సంబంధించిన తరి భూమి 2.5 ఎకరాల కన్నా ఎక్కువగా ఉంటే డిమాండ్ చార్జి 525 రూ. సం.నకు ఒక హెచ్.పి.కి మరియు యూనిట్ కు 0.50 పై. విద్యుత్ చార్జీ అని గత టారిఫ్ ప్రకారం ఉంది. ఇప్పుడు కూడా అదే ధరలను ప్రతిపాదించారు. LT-VA టారిఫ్ క్యాటగిరి లో తెలంగాణా రాష్ట్రం మొత్తం అంటా కలిసి 2 కోట్ల ఆదాయం కూడా లేదు. ఈ మొత్తం ఆదాయ అవసరాల్లో అతి స్వల్పమే కానీ ఈ నిబంధనను అడ్డు పెట్టుకొని క్షేత్ర స్థాయి సిబ్బంది అమాయకులైన రైతులను వేధిస్తున్నారు వేలకోట్ల రూపాయలను ఖర్చుపెట్టి నీటి ప్రాజెక్టులు కట్టిన చోట 2.5 ఎకరాల కన్నా ఎక్కువ మాగాణి ఉన్న రైతులకు కూడా నీటి తీరువా లేదు. అలాగే ప్రభుత్వ ఎత్తిపోతల పథకాల విషయంలో మొత్తం బిల్లు లు ప్రభుత్వమే చెల్లిస్తుంది ఇటువంటి నిబంధన లేదు. కావున తమరు రైతాంగ సమస్యలను గుర్తించి క్షేత్ర స్థాయి సిబ్బంది ఒత్తడి నుండి రైతాంగాన్ని రక్షించడానికి ఈ నిబంధనను ఎత్తి వేయగలరని ప్రార్థిస్తున్నాము</p>	<p>రాష్ట్ర ప్రభుత్వం సవరించిన ఉచిత విద్యుత్ విధానాన్ని అనుసరించి గౌరవ కమీషన్ వారు జారి చేసిన ధరల ఉత్తర్వుల ప్రకారం ఉచిత విద్యుత్ ను సరఫరా చేయడం జరుగుతుంది.</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
2.	<p>2 సంవత్సరాల క్రితం జరిగిన బహిరంగ విచారణలో ప్రస్తుత మన రాష్ట్ర మంత్రివర్గమైన శ్రీ తన్నీరు హరీష్ రావు గారు ల్యాంక్ కంపెనీకి సంబంధించి స్వల్పకాలిక విద్యుత్ కొనుగోలు విషయంలో ఒప్పందాల కన్నా కోట్లాది రూపాయలు ఎక్కువ చెల్లింపులు డిస్కాం లు చేసినవి. వాటిని తిరిగి రాబట్టడమే కాకుండా బాధ్యులైన అధికారుల పై మరియు ల్యాంక్ కంపెనీ పై క్రిమినల్ కేసులు పెట్టాలని డిమాండ్ చేసారు. మేమందరం ప్రజా ప్రయోజనాల దృష్ట్యా వారికి మద్దతు తెలిపి చర్యలు తీసుకోవాలని బహిరంగ విచారణలో డిమాండ్ చేయడం జరిగింది. ప్రస్తుతం మన ఇంటి ప్రభుత్వం ఉంది చర్యలు డిమాండ్ కు చేసిన టి. హరీష్ రావు గారు మంత్రి కూడా అయినారు. ల్యాంక్ కి కరిపిన అక్రమ చెల్లింపుల విషయం డిస్కాం లు కాని, ప్రభుత్వం వారు కానీ తీసుకున్న చర్యలు ఏమీ తెలిపాలి. ఈ విషయంలో ప్రస్తుతం ఆంధ్ర లాబీయింగ్ ఒత్తికి కూడా లేదు. కావున నిజానిజాల గురించి స్పష్టమైన ప్రకటన డిస్కాం లు చేయాలి. విద్యుత్ నియంత్రణ మండలి వారు తమ వైఖరిని ఈ విషయంలో స్పష్టం చేయడమే కాకుండా ప్రస్తుత తెలంగాణ ప్రభుత్వ వైఖరి ఏమిటి అనేది ప్రభుత్వం ద్వారా సమాధానం ఇప్పించి ప్రభుత్వం మరియు డిస్కాం పారదర్శకతను నిరూపించి, గత ప్రభుత్వంలో ఉన్న పారిశ్రామిక వేత్తలైన ఆంధ్రా పెత్తందారులు జరిపిన నష్టాలు బయటపెట్టాలని తమరికి విన్నవించు కొంటున్నాను</p>	<p>APPCC వారు చేసిన స్వల్పకాలిక విద్యుత్ కొనుగోళ్ళ పై శ్రీ టి. హరీష్ రావు గారు లేవనెత్తిన అభ్యంతరాలు ఆధారంగా, APPCC వారు అదనంగా చెల్లించిన రూ.12,12,18,314/- రాబట్టుకోవడం జరిగినది దీని పై NETSL trader వారు ఆంధ్రప్రదేశ్ గౌరవనీయ హై కోర్టు ముందు పిటిషన్ W.P No.17631/2013 దాఖలు చేసారు. గౌరవనీయ హై కోర్టు NETSL కి అనుకూలంగా ఉత్తర్వులు జారీ చేసింది.</p>
3.	<p>నెలకు 100 యూనిట్ల కన్నా తక్కువ విద్యుత్ వినియోగించే గ్రామీణ / పట్టణ సామాన్య చిన్న హోటల్ వారికి యూనిట్ కు ఋ.7.80 పై - 100 యూనిట్లు దాటితే ఋ.8.60 పైసలు అదే రాజీవ్ గాంధీ ఇంటర్నేషనల్ ఎయిర్ పోర్ట్ లో ఉన్న స్టార్ హోటల్ కు యూనిట్ కు ఋ.6.05 పై.లు ఎంత వరకు సబబో తమరు ఆలోచించి నిర్ణయం తీసుకోవాలి.</p>	<p>లైసెన్స్ పరిధిలో లేని అంశము.</p>

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
	<p>రాజీవ్ గాంధీ ఇంటర్నేషనల్ ఎయిర్ పోర్ట్ కు (ఇందులో సింహభాగం వాటా జి.ఎం.అర్. సంస్థ) గత రెండు సంవత్సరాల క్రింద కమర్షియల్ క్యాటగిరి నుండి ప్రజా ట్రాన్స్ పోర్ట్ సంస్థ లైన అర్.టి.సి. మరియు రైల్వే ల సరసన చేర్చి వారికి సంబంధించిన విద్యుత్ చార్జీ తగ్గే వెసులుబాటు కల్పించాలి. రాజీవ్ గాంధీ ఇంటర్నేషనల్ ఎయిర్ పోర్ట్ వారు 5400 ఎకరాల రైతాంగపు భూములను ప్రభుత్వం ద్వారా సేకరించి ఎయిర్ పోర్ట్ సేవల్ కాకుండా స్టార్ హోటల్స్ మొదలుకొని వివిధ వ్యాపార సంస్థల ద్వారా అత్యధిక ధరలను దేశ విదేశీ వినియోగదారుల నుండి వసూలు చేస్తున్నారు(100 కోట్ల ఖర్చు చేసిన ఒక పెండ్లి రాజీవ్ గాంధీ ఇంటర్నేషనల్ ఎయిర్ పోర్ట్ స్టార్ హోటల్ లో జరిగిందని పత్రికల్లో చదివాము టీ నుండి మొదలుకొని పార్కింగ్ వరకు వీరి వద్ద ఏ సేవలైనా అధిక ధరలే. స్టార్ హోటల్స్ లో కోట్లాది రూపాయలు ఖర్చు చేసే ధనికులు వివిధ ఫంక్షన్స్ చేసుకుంటారు. ఇది పక్కా వ్యాపారమే కాదు కదా కాస్ట్ లీ వ్యాపారం కుడా. దానిని పేద, సామాన్య, మధ్య తరగతి ప్రజలకు సేవ చేసే అర్.టి.సి. రైల్వే లతో ఎలా పోలుస్తారు అర్.టి.సి, రైల్వే పార్కింగ్ రూ.5/- నుండి రూ.10/-, టీ, రూ.5/- నుండి రూ.7/- లు. బస్, రైల్వే దొరకకుంటే రాత్రి ఉచితంగా ప్లాట్ ఫం పై పాడుకోవచ్చును. ఇలాంటి సేవలు ప్రజలకందిస్తూ ప్రజాభిమానాన్ని చూరగొన్న సంస్థల సరసన జి.ఎం.అర్. ఎయిర్ పోర్టును చేర్చి ఈ సంస్థల గౌరవాన్ని, సేవా నిరతిని తగ్గించారు గౌరవ విద్యుత్ నియంత్రణ మండలి వారు దాని పై పునరాలోచన చేసి రాజీవ్ గాంధీ ఇంటర్నేషనల్ ఎయిర్ పోర్ట్ ఎన్నో వ్యాపార సంస్థలు ఉన్నవి, వాటి సేవలు ఏమిటి పరిశీలించి వాటి సేవల ఆధారంగా, వారు వినియోగదారుల పై వసూలు చేసే టారిఫ్ ఆధారంగా టారిఫ్ నిర్ణయించాలని తమరికి విన్నవించు కుంటున్నాము.</p>	

క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు																
4.	<p>సి. .అర్.ఎఫ్. సభ్యులతో సహా ఉన్నతాదికారులందరూ తమ తమ వాహనాలలో ఎన్ని . .లు ప్రయాణం చేయడానికై అనుమతి ఉంది, ఎన్ని కి. . ప్రయాణం చేస్తున్నారు</p> <p>సి. .అర్.ఎఫ్. సభ్యులు వీరి హెడ్ క్వార్టర్స్ నుండి వారు హియరింగ్ వెళ్ళే స్థానానికి ఒక కారులో అందరు వెళ్తున్నారా? లేదా ఎవరి కారు వారు వాడుతున్నారా? సి. .అర్.ఎఫ్. వినియోగదారుల సభ్యునికి కల్పించిన ప్రయాణ వెసులుబాటు ఏమిటి? వినియోగదారుల సభ్యుడు డిస్కాం సభ్యులు సమానమేనా? లేక తేడా ఏమైనా ఉందా? వినియోగదారునికి (ఎస్.పి. .సి.ఎల్) చెలించాల్సిన ప్రయాణపు ఖర్చులను గత రెండు సంవత్సరాలుగా రకరకాల కారణాలు చూపి చెల్లించక మానసికంగా క్షోభ పెట్టి విచారణకు రాకుండా చేయడాన్ని డిస్కాం పెద్దలు సమర్థిస్తున్నారా? గౌరవ విద్యుత్ నియంత్రణ మండలి వారు విచారించి ఇ.అర్.సి. వారు నియమించిన సభ్యుని గౌరవాన్ని కాపాడుతూ ఆర్థికంగా కూడా ఆసమానం కాకుండా చూడగలరని ప్రార్థిస్తున్నాం.</p>	<p>TSNPDCL వారు చైర్-పర్సన్ కు 2500 కిలో మీటర్లు మరియు మెంబర్ అకౌంట్స్ మరియు మెంబర్ లీగల్ కు 2000 కిలో మీటర్లు అనుమతి ఇచ్చారు.</p> <p>CGRF సభ్యులు ఫిబ్రవరి 2015 నెలలో ప్రయాణం చేసిన కిలోమీటర్లు ఈ విధంగా ఉన్నాయి.</p> <table border="1" data-bbox="1228 573 1955 857"> <thead> <tr> <th>క్రమ సంఖ్య</th> <th>సభ్యుని హోదా</th> <th>అనుమతించిన కిలో మీటర్లు</th> <th>ప్రయాణం చేసిన కిలో మీటర్లు</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>చైర్ పర్సన్</td> <td>2500</td> <td>4454</td> </tr> <tr> <td>2.</td> <td>మెంబర్ అకౌంట్స్</td> <td>2000</td> <td>2000</td> </tr> <tr> <td>3.</td> <td>మెంబర్ లీగల్</td> <td>2000</td> <td>2499</td> </tr> </tbody> </table> <p>ఎవరి వాహనం వారే వాడుతున్నారు. కొన్ని ప్రత్యేక సందర్భాలలో ఒకే వాహనంలో ఇద్దరు ప్రయాణం చేయడం కూడా జరుగుతుంది.</p> <p>CGRF వినియోగదారుల సభ్యుడు విధులకు హజైరైన రోజున రోజు బత్యముగాను రూ.750/- నిర్ణయించడమైనది. ఈ ప్రొసీడింగ్స్ నెం.APERC/Secy/DD(EAS)/F:S-337/ 06/2013, Dt:01.08.2013 ప్రకారం రూ.750 నుండి రూ.1500 లకు పెంచడం జరిగింది.</p> <p>DISCOM సభ్యులకు vote విలువ ఉన్నది. వినియోగదారుని సభ్యునికి vote విలువ లేదు.</p> <p>వినియోగదారుల సభ్యుల ఇప్పటి వరకు సమర్పించిన దిన భత్యం</p>	క్రమ సంఖ్య	సభ్యుని హోదా	అనుమతించిన కిలో మీటర్లు	ప్రయాణం చేసిన కిలో మీటర్లు	1.	చైర్ పర్సన్	2500	4454	2.	మెంబర్ అకౌంట్స్	2000	2000	3.	మెంబర్ లీగల్	2000	2499
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క్రమ సంఖ్య	అభ్యంతరములు / సూచనలు	సమాధానములు
		బిల్లు లు మొత్తము చెల్లించడం జరిగింది వినియోగదారుల సభ్యుడు తదుపరి సందేహాల కై నియంత్రణ మండలి (ERC) వారిని సంప్రదించి తగు ఉత్తరువులు పొంద గలరు.

Replies to the Objections / Suggestions raised on ARR & FPT for FY 2015-16 of Sri Dr. L. Muralidhar, Jana Vignana Vedika & Praja Science Vedika, 42-242, Newtown colony, Praja Vidyasal, Wanaparthy, Mahaboobnagar

Summary of Objections / Suggestions	Response of the Licensee																																													
<p>Deaths due to shocks Every year hundreds of farmers are meeting death due to electrical shocks. This is highly avoidable. During 2013-14 in Telangana 436 people died due to electrical shocks. More than 50% of these cases under SPDCL took place in the circles/districts of Mahabubnagar and Nalgonda. Similar is the case in the first half of 2014-15. Further these figures are an under estimate of the reality. Farmers are the main victims of this phenomenon.</p> <p>Table: Deaths Due to Electric Shocks</p> <table border="1"> <thead> <tr> <th></th> <th>2013-14</th> <th>First Half of 2014-15</th> </tr> </thead> <tbody> <tr> <td>NPDCL</td> <td>185</td> <td>87</td> </tr> <tr> <td>Mahabubnagar</td> <td>115</td> <td>69</td> </tr> <tr> <td>Nalgonda</td> <td>84</td> <td>25</td> </tr> <tr> <td>SPDCL</td> <td>251</td> <td>129</td> </tr> <tr> <td>Total Telangana</td> <td>436</td> <td>216</td> </tr> </tbody> </table> <p>The DISCOMs did not provide complete details of these incidents like for how many cases DISCOMs took responsibility and in how many cases compensation was paid and amount paid towards compensation. NPDCL mentioned that compensation was paid in 56 cases out of 185 deaths in 2013-14 and in 11 cases out of 87 deaths during the first half of 2014-15. Procedures need to be</p>		2013-14	First Half of 2014-15	NPDCL	185	87	Mahabubnagar	115	69	Nalgonda	84	25	SPDCL	251	129	Total Telangana	436	216	<p>Every effort is being made to avoid accidents, by taking up regular maintenance works like replacement of conductor, providing of inter poles, maintenance of DTRs structure and LT lines, providing of earthing. Wide publicity being given requesting Ryots not to handle with Distribution Transformers. During the FY 2014-15 the licensee has erected 4177 middle poles in the loose lines with an expenditure of RS 1.89 Crs, 23207 locations in various lines were rectified to avoid accidents.</p> <p>Further works were awarded to erect 200 middle poles in each section in Discom in the coming 3 months.</p> <p>Non Departmental Fatal accidents in NPDCL</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th colspan="3">2013-14</th> <th colspan="3">2014-15^{up to 2/2015}</th> </tr> <tr> <th>Human</th> <th>Animal</th> <th>Total</th> <th>Human</th> <th>Animal</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Reported by field</td> <td>159</td> <td>298</td> <td>457</td> <td>156</td> <td>172</td> <td>328</td> </tr> <tr> <td>Exgratia sanctioned by the department</td> <td>27</td> <td>132</td> <td>159</td> <td>76</td> <td>122</td> <td>198</td> </tr> </tbody> </table> <p>As per directions of APERC (Proceeding No.APERC/Secy/EAS/S-101/177/2013, Dt13.08.2013), the NPDCL has enhanced existing ex-gratia amount in case of fatal accidents to non departmental person and animals due to electrocution i.e. Human being from Rs.1 to 2 Lakhs, cattle from RS. 3,000 to Rs. 20,000 and goat and sheep @ Rs.4,000 respectively and sanction procedure is simplified to grant ex-gratia to victims irrespective of the mistake from any side. Further online tracking of accidents taken place in TSNPDCL and reports</p>		2013-14			2014-15 ^{up to 2/2015}			Human	Animal	Total	Human	Animal	Total	Reported by field	159	298	457	156	172	328	Exgratia sanctioned by the department	27	132	159	76	122	198
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<p>simplified to see that all victims receive compensation at the earliest.</p> <p>Even in the electrocution deaths that the DISCOMs had taken responsibility the amount paid (about Rs. 1 lakh per person) is very meagre. Even this meagre amount was not paid properly. There is need to revise the compensation upwards like in the case of railways.</p>	<p>submission is commenced from 12/2014 to see that all eligible victims receive compensation at the earliest.</p>
<p>There shall also be separate mechanism to pin responsibility for deaths due to electricity shocks. In the present case perpetrator it self is the judge. To avoid this anomaly a committee comprising different stakeholders shall go into these deaths and pronounce whether DISCOMs are responsible for these tragedies or not.</p>	<p>Within 24 hours preliminary report and then detailed report is being furnished by ADE. As per Government of Telangana instructions the Chief Electrical Inspector to Government is being reported about the electrical accident. Then jurisdictional Deputy Electrical Inspector will investigate the electrical accident.</p>
<p>More than this these deaths are highly avoidable. These deaths are taking place due to neglect of rural network by the DISCOMs. Every year the Commission allowed Rs. 5 crore to be spent by the DISCOMs on safety measures to avoid such deaths. But DISCOMs did not care to utilise them. NPDCL spent Rs. 34.25 lakh during 2013-14 and Rs. 12.29 crore during first half of 2014-15. If the safety of DTRs were improved many of these deaths could have been avoided.</p> <p>In most of these cases it was the farmers who met this tragic end. These deaths could have been avoided if there were timely and sufficient technical support at the ground level and good quality electrical network. Most of the technical posts like linemen in rural areas are vacant and farmers are forced to attend to repair work on their own with fatal consequences. Thousands of line men posts are lying vacant since a long time. Recently Telangana State Government announced that hundreds of electrical engineers will be recruited shortly. But there is no word about recruiting line men. Filling line men posts not only bring down deaths due to shocks but also help to bring down T&D losses and their by add to the income of the DISCOMs.</p>	<p>Rural network is strengthened by incorporating additional improvement of transformers, substations and sanction of HT and LT lines in year 2014-15. Tom-tom is done in the villages not to meddle the DTRs for avoiding the Electrical accidents. The Spacers are used to prevent accidents in case of snapping of LT lines. The 11 KV breakers at 33/11 KV substations are put in trimmed condition for cutting of the power supply in case of snapping of 11 KV conductor. Higher size of conductor is replaced where the lines are overloading.</p> <p>Tom-tom is done in the villages about not to meddle the DTRs for avoiding the Electrical accidents. To support the field staff, the labour@ Rs 4000/- per month is deployed in TSNPDCL for extending better services in 250 distributions.</p>
<p>Quality of Power</p>	<p>Voltages and quality of power supply to consumers is closely monitored from corporate office level</p>

<p>Electricity received by the farmers was of uneven quality with unpredictable interruptions. Power supply timings announced by the Licensees are not being adhered to. It is the responsibility of the Commission under Section 86 (1) (i) of the Electricity Act, 2003 to enforce standards with respect to quality, continuity and reliability of service by licensees.</p> <p>In the past DISCOMs used to post feeder-wise electricity supply details on their websites. But they stopped this practice suddenly some time back. We request the Commission to direct the DISCOMs to post all relevant information on quantum and quality of supply on their websites.</p>	<p>whenever the complaint is received regarding low voltages and poor quality of supply.</p> <p>Everyday 11KV feeder wise electricity supply details are received from field on the same day night hrs and will be reviewed regularly.</p>
<p>DTR failure/repair</p> <p>DISCOMs are also not attending to maintenance of DTRs properly. Farmers are being forced to incur expenditure in transporting the DTRs. DTRs are also not being repaired in time. DISCOM staff are also collecting money from farmers to repair DTRs. They are not attending to repairs until the farmers pay up. In Kanugutta village of Both mandal in Adilabad district it took 10 days to repair the DTR. In Madaka village of Odelu mandal in Karimnagar district it took more than one week to repair the transformer while under Standards of Performance DTRs in rural areas shall be repaired within 48 hours.</p>	<p>Presently 3629No.s Healthy DTRs are available under Rolling stock of TSNPDCL and any failed DTR can be replaced with in 24Hrs.</p> <p>Regarding failure of DTR in Kanugutta village of Both mandal in Adilabad district, it is a 63KVA DTR and failed repeatedly on 20-01-2015 and 5-02-2015. The consumers are drawing water from near by Kharat project canal and Peddavagu canal by using unauthorized pump sets and DTR is failing on overload. It is instructed to replace the failed DTR immediately and action may be taken against illegal connections. Further there is no complaint of failure DTR in Madaka with 1week duration in this Rabi season.</p>
<p>Low quality of power in rural areas is also because of crumbling transmission and distribution network in rural areas. Decades old conductors are hanging low endangering lives as well as resulting high transmission losses. Many of the DTRs are more than decade old and should have been replaced. Added to this many of these DTRs do not have even AB switches. Depreciated and</p>	<p>The old conductors are replaced in phased manner. The old DTRs having age more than 25yr. and drawing more magnetizing currents are survey reported and replaced with new DTRs. Due to complaint of theft of DTRs and meddling of DTRs, small capacity of DTRs are erected and controlled</p>

<p>old parts of T&D network shall be replaced in keeping with prudent maintenance of the network in good health.</p>	<p>group of DTRs with one AB switch.</p>
<p>DSM Measures To be eligible for free power, farmers have to undertake demand side management (DSM) measures i.e., installation of capacitors, ISI marked pump sets, HDPE or RPVC piping and frictionless foot-valve. These measures are proposed to bring down quantum electricity consumption in the agriculture sector there by reducing financial burden both on the state government and farmers. Farmers also would like to contribute to this endeavour. Though farmers are interested in taking them up they are facing hurdles in implementing them.</p> <p>DISCOM officials are claiming that more than 90% of the farmers have installed capacitors. But truth is that not even 10% of the farmers installed capacitors. Farmers do not have technical assistance in the form of access to linemen or assistant linemen, to take this up. thousands of line men posts in rural areas are lying vacant. Even where linemen or assistant linemen are available they do not have proper knowledge in installation of capacitors. Installation of capacitors at a wrong point led to burning of pump sets, which scared other farmers from doing the same.</p>	<p>Agriculture services are being released for the consumers who have paid DDs.</p>
<p>A pilot implemented by SPDCL (p.88) power consumption declined by nearly 10% after installation of capacitors. This implies that by spending Rs. 60 crore to install capacitors at 20 lakh pump sets in Telangana DISCOMs will be able to save about Rs. 500 crore. This alone shall spur the DISCOMs to implement capacitor programme on war footing.</p>	
<p>Use of ISI standard pump set is another important DSM measure. Present pump set efficiency in the State is only 25% and this could be increased to 50% by using ISI standard motors. For proper operation of ISI standard pump sets minimum voltages are required. Under prevailing low voltages in the state these ISI motors do not work. Because of this low voltage, farmers are forced to go in for locally made pump sets which operate even under low voltages. One of the reasons for low voltage is</p>	<p>Improvement of DTRs and Erection of new 33/11 KV and 132/33 KV substations are proposed for improvement of voltages at tail end of consumer. Wherever the authorized overloading is noticed, the additional DTR of adequate capacity in the agriculture sector at load centre is installed. The present day voltage will suitable for ISI pumpsets.</p>

<p>overloading of distribution transformers (DTR) installed for agricultural purposes. This overload is to the extent of 25 to 50%. If this overload problem is addressed successfully farmers can think of using ISI standard motors. This can be addressed by increasing the number of DTRs of adequate capacity in the agriculture sector. We request the state government and DISCOMs to install additional DTRs to solve low voltage problem so that farmers will be emboldened to go in for ISI standard motors.</p>	
<p>Though the farmers may be willing to install ISI standard motors in the event of voltages improving the financial burden on them will be onerous and it will be good to explore the ways of minimizing burden on them in replacing the non-standard motors with ISI standards motors. In Tamil Nadu, the State government and utilities are said to have taken up a programme where a third party – Electricity Service Company (ESC) – takes the responsibility of replacing the motors and is given a share in the savings of electricity consequent to installation of standard motors. We request the State government to explore this option also as it will not burden the state government as well as the farmers.</p>	<p>It not the purview of the Licensee as it is policy matter.</p>