

Southern Power Distribution Company of Telangana Ltd. (TGSPDCL)



Additional Responses to Objections / Suggestions received during public hearing

Held on dt.23.09.2025 on

Proposed revision of ToD tariff for the year 2025-26

Sl.No.	Name and other details of the Objector
1	South Indian Cement Manufacturers' Association Federation of Telangana Chambers of Commerce and Industry (FTCCI), Telangana Spinning & Textile Mills Association
2	M. Venugopala Rao
3	Venkat N.K.K
4	ITC Limited
5	Ramagundam Fertilizers and Chemicals Limited

South Indian Cement Manufacturers' Association

Federation of Telangana Chambers of Commerce and Industry (FTCCI),

Telangana Spinning & Textile Mills Association

Sl.No.	Objections/Suggestions	Response of licensee
1	Under Sec 62(4) of electricity act 2003, no tariff shall be ordinarily amended. Since demand pattern and availability patterns have not changed much from the last 2-3 years, there is no extraordinary event due to which licensee proposed the tariff amendment	The delay in the commissioning of YTPS units is beyond the control of the licensee and this delay caused reduced energy availability during the night hours (10pm to 6am).
2	Discoms are yet to file the true up petitions for FY23 and FY24 despite the directions of hon'ble commission. These amounts are huge when compared to the ToD incentive. If Discoms are concerned that their revenues are getting affected, then filing true up petitions would help them instead of ToD revision.	The true ups are related to overall power purchase costs and these are not passed on to any specific category. But the ToD incentive is applicable to only few HT categories.
3	Discoms on one hand says that they have surplus power available for the year and on	Licensee would like to submit that the demand and supply availability varies throughout the day, and

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	the other hand, they say that they are purchasing costly power from the market due to the deficit power.	also for different months and seasons. The surplus power is available during the solar hours and this is the main reason why licensee wants to shift the consumption from night hours(10pm to 6am) to solar hours (10am to 5 pm). The deficit is mostly in the peak hours (morning peak and evening peak) and the night hours, during which deficit power is purchased from the market (DAM and GDAM)
4	Discoms are not providing any incentive during the solar hours (10am to 6pm) in which market rates are falling to Rs. 2/unit.	Licensee would like to submit that it is examining the possibility of giving incentive during solar hours in the next ARR filings for FY 27. Since PPA's are done with thermal plants, licensee is obliged to give schedule for 55% of availability to these plants. Hence the cost/unit for the licensee wouldn't go to the level of Rs.2-3/unit.
5	The purpose of ToD tariff is to flatten the load curve. By removal of incentive during the night hours (10pm to 6am), the load curve would be skewed and purpose of ToD	There has been dynamic change in the supply patterns and also consumer consumption patterns in the past few years. The initial intent of ToD is to flatten the load curve since the only major power

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	would be defeated	source is thermal power. But in the present scenario, the supply patterns have changed drastically and it is not anywhere near to flat curve. Hence ToD purpose is to bring demand curve to supply availability rather than making it flat

M. Venugopala Rao

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1	In RSTO order, the revenues and costs are calculated, and the present proposal would increase the revenue to the licensee beyond the RSTO order.	In the ARR filings, the YPTS units are projected to be commissioned but got delayed due to certain reasons which are not in control of the licensee. DISCOMs would like to submit that any cashflow arising out of the ToD is not an additional revenue to the DISCOM but a mechanism to recover the expensive power purchases.
2	ToD efficacy is not tested. The shift happened due to ToD tariff from peak hours to non-peak hours is not calculated	It is difficult for the licensee to assess the impact of ToD on peak demand reduction as the shift would have happened gradually over years beginning from the first year of ToD implementation. But ToD tariff is a globally accepted tool for demand side

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		management and peak reduction.
3	There will be impact of ToD on the consumption for only 2-3 years and continuing for long time around 10 years is not required	The demand and consumption patterns are changing dynamically over time and this is not the same compared to 10 years ago. In this context, the TOD tariff tries to change the consumption pattern and bring it near to supply availability
4	Heavy integration of renewable energy is causing uncertainty	The renewables help in providing low cost supply and also reduce the carbon emissions. To meet the gradual increase in demand from day to day, thermal will not be sufficient in the future years to cater the demand of the state.

Venkat N.K.K

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1	ToD is not only a cost recovery measure, but it is also a tool for demand management, grid support	Licensee acknowledges the same and the present proposal is in line with the measures mentioned
2	Discoms should not give an incentive during solar hours from the next financial year. Since Discoms are not charging the market	Licensee is examining the possibility of whether to give incentive or maintaining the normal tariff during solar hours in the next ARR filings for FY 27.

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	costs Rs.11/unit during the peak an night hours, they should not reduce the tariffs during solar hours.	
3	ToD is not to flatten the curve. Making demand curve flat would be detrimental for the Discoms.	There has been dynamic change in the supply patterns and also consumer consumption patterns in the past few years. The initial intent of ToD is to flatten the load curve since the only major power source is thermal power. But in the present scenario, the supply patterns have changed drastically and it is not anywhere near to flat curve. Hence ToD purpose is to bring demand curve to supply availability rather than making it flat

ITC limited

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1	Petition is filed based on the analysis of Q1 data of FY26. But since the consumption in Q1 is generally higher, this cannot be representative of the whole year	The analysis submitted by the licensee for the petition is not based on Q1 but for the entire FY25. The actual power purchase made in FY 25 from all the contracted sources and market purchases are considered for arriving at the hourly power purchase

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		cost
2	Since optimization is done in some hours by backing down costly thermal power, the additional burden due to higher power purchases in other hours would be nullified	Licensee would like to submit that the hourly power purchase cost arrived for FY25 is including the optimizations done by licensee.

Ramagundam Fertilizers and Chemicals Limited

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1	The demand charges are increased in the previous RST order FY25. Now increasing the energy charges in form of ToD is a double blow to the industries like RFCL which runs on 24 hour basis	The per unit power purchase cost for licensee during the time period 22:00 hrs to 06:00 hrs is higher than cost during other times. Providing incentive during these hours would create financial burden to the licensee, which are ultimately passed on to consumers through tariff adjustments—potentially leading to future hikes.