

**BEFORE THE HONOURABLE TELANGANA STATE ELECTRICITY REGULATORY
COMMISSION**

AT ITS OFFICE AT 5th Floor, Singareni Bhavan, Red Hills, Hyderabad - 500 004

FILING NO. _____/2021

CASE NO. _____/2021

In the matter of:

Filing of Distribution Business true ups for the Third Control period (FY 2014-15 to FY 2018-19) in accordance with the "Andhra Pradesh Electricity Regulatory Commission (Terms And Conditions For Determination Of Tariff For Wheeling And Retail Sale Of Electricity) Regulation, 2005" as adopted by Telangana State Electricity Regulatory Commission vide Regulation No. 1 of 2014 and in accordance with Directive No. 3 of Wheeling Tariff Order for Distribution Business for 4th Control Period (FY 2019-2024).

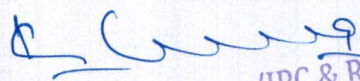
In the matter of:

SOUTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED

... Applicant

The Applicant respectfully submits as under: -

1. **As per Clause 19, Pg 11 of the 'Andhra Pradesh Electricity Regulatory Commission** (Terms and Conditions for Determination Of Tariff For Wheeling and Retail Sale of Electricity)' Regulation No. 4 of 2005 as adopted by TSERC Reg. No. 1 of 2014, the licensee has to file for corrections for "uncontrollable" and "controllable" items and as well as sharing of gains/losses for the Third control period (FY 2014-15 to FY 2018-19).
2. In this regard, it is to submit that the DISCOMs have made submissions regarding the true-up claims for 1st, 2nd and 3rd Control Periods along with ARR filings for Distribution business for the fourth control period (FY 2019-2024).
3. Subsequently, the Honble Commission in its Tariff Order dt. 29.04.2020, has directed the DISCOMs to submit their true-up claims along with complete details regarding the capitalization claimed for each year of the 1st, 2nd and 3rd Control Periods in the Petitions to be filed for Annual Performance Review for FY 2019-20 before 31.12.2020. (Directive No. 3)
4. The Discom could not file the True-up petition for 3rd Control period within the stipulated date as directed by the Commission and in this regard an interlocutory application to condone the delay in filing the petition is submitted herewith.


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5. In compliance to the Directive No.3, the Licensee is submitting the following as part of the True up filings for the Third Control Period (FY 2014-15 to FY 2018-19) along with requisite supporting documents.

- i. Allocation statement to segregate expenses and income of Controllable and Uncontrollable items under Distribution Business
- ii. Statement of Variance with Tariff Order approved figures pertain to items under Distribution Business for the Third Control Period (FY 2014-15 to FY 2018-19)
- iii. Corrections for Uncontrollable items under Distribution Business along with reasons for variation
- iv. Corrections for Controllable items under Distribution Business along with reasons for variation

6. As per the 'Andhra Pradesh Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff for Wheeling and Retail Sale of Electricity)' Regulation No. 4 of 2005, as adopted by TSERC Reg. No. 1 of 2014 Clause 10, Pg. 7 –

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4. *Controllable and Uncontrollable items of ARR: -The expenditure of the Distribution Licensee considered as "controllable" and "uncontrollable" shall be as follows:*

Distribution Business	
ARR Item	"Controllable"/ "Uncontrollable"
Operation & Maintenance expenses	Controllable
Return on Capital Employed	Controllable
Depreciation	Controllable
Taxes on Income	Uncontrollable
Non-tariff income	Controllable

In addition to the above items the retail supply business shall include the following:

Retail Supply Business	
ARR Item	"Controllable"/ "Uncontrollable"
Cost of power purchase	Uncontrollable


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5. *Pass-through of gains and losses on variations in "uncontrollable" items of ARR:- The Distribution Licensee shall be eligible to claim variations in "uncontrollable" items in the ARR for the year succeeding the relevant year of the Control Period depending on the availability of data as per actuals with respect to effect of uncontrollable items:*

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.

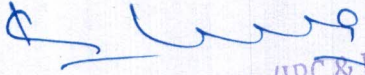
6. *Sharing of gains and losses on variations in "controllable" items of ARR: - The Distribution Licensee in its annual filings during the Control Period shall present gains and losses for each controllable item of the Aggregate Revenue Requirement.*

A statement of gain and loss against each controllable item will be presented after adjusting for any variations on account of uncontrollable factors.

7. *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."

7. Further, it is pertinent to mention that the retail true-up in respect of power purchase is to be done every year in accordance to APERC Regulation 1 of 2014 (First amendment to Regulation No. 4 of 2005) as adopted by TSERC Regulation No. 1 of 2014 every year. The true-ups of the Distribution business for a control period have to be taken up at the end of the control period i.e. 5-year period as per Regulation 4 of 2005. Hence, the licensee requests the Hon'ble Commission to approve the total true up gap arising out of the deviations in both "uncontrollable" and "controllable" items for the Third MYT Control Period with actuals for FY 2014-15 to FY 2018 -19 which are detailed in subsequent sections.



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7.1 True-up of ARR Components & Total Revenue Gap

The Distribution Licensee (TSSPDCL) files for the trueing-up of Rs 1300.69 Crs for the Third MYT Control Period from FY 2014-15 to FY 2018-19. Summary of ARR line items and revenue for FY 2014-2015 to FY 2018-2019 is shown in the table below.

Name of the Parameter	Units	2014-15			2015-16			2016-17			2017-18			2018-19			Third Control Period Total		
		2014-15			2015-16			2016-17			2017-18			2018-19			Third Control Period Total		
		App	Act	Dev	App	Act	Dev	App	Act	Dev	App	Act	Dev	App	Act	Dev	App	Act	Dev
O & M Expenses	Rs. Crs.	1056	1316	260	1164	1081	(83)	1398	1841	444	1634	2109	475	1901	2404	503	7153	8751	1598
Return on Capital Employed	Rs. Crs.	278	234	(44)	376	333	(43)	490	559	69	610	565	(45)	730	542	(188)	2484	2233	(251)
Depreciation during the year	Rs. Crs.	497	457	(40)	562	545	(17)	635	673	39	705	772	68	774	856	81	3173	3303	130
Taxes on Income	Rs. Crs.	14	0	(14)	19	0	(19)	25		(25)	32		(32)	38	0	(38)	129	0	(129)
Special Appn. for Safety measures*	Rs. Crs.	30	0	(30)	35	0	(35)	40	0	(40)	45		(45)	50	0	(50)	200	0	(200)
Other Expenditure	Rs. Crs.	0	1	1	1	6	5	1	10	9	1	16	16	1	22	21	3	54	52
Gross ARR	Rs. Crs.	1876	2008	132	2157	1964	(193)	2589	3083	495	3026	3463	437	3494	3824	330	13141	14341	1200
Revenue	Rs. Crs.	241	264	23	326	292	(34)	321	323	3	363	229	(134)	395	437	41	1646	1545	(101)
Total Revenue	Rs. Crs.	241	264	23	326	292	(34)	321	323	3	363	229	(134)	395	437	41	1646	1545	(101)
Total Gap	Rs. Crs.	1635	1743	109	1831	1672	(159)	2268	2760	492	2663	3234	571	3099	3387	288	11495	12795	1301

* App-Approved, Act-Actual, Dev-Deviation


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Reasons for Deviation in year wise ARR:

As shown in the above table, the actual Gross ARR is **Rs 14341 Crs.** as against TSERC approved ARR of **Rs. 13141 Crs.**

7.1.1 Operation & Maintenance (O&M) Expenses:

TSSPDCL's actual O&M Expenses (net of capitalization) for the Third MYT Control period is **Rs 8751 Crs.** as against the Hon'ble Commission approved expenses of **Rs. 7153 Crs.** resulting in a deviation of **Rs 1598 Crs.** Summary of Operation & Maintenance (O&M) Expenses for FY 2014-2015 to FY 2018-2019 is as shown below

All figures in Rs. Crs.															
Name of the Parameter	2014-15			2015-16			2016-17			2017-18			2018-19		
	App	Act	Dev	App	Act	Dev	App	Act	Dev	App	Act	Dev	App	Act	Dev
O & M Expenses (net of expenses capitalised)	1056	1316	260	1164	1081	-83	1398	1841	444	1634	2109	475	1901	2404	503
-Employee Expenses	725	990	265	772	720	-52	935	1387	452	1098	1804	706	1285	2135	849
-A&G Expenses	248	75	-173	231	88	-143	274	316	42	318	197	-121	367	143	-224
-Repairs & Maintenance	83	250	168	161	273	112	189	139	-50	219	109	-110	249	127	-123

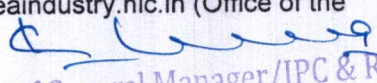
Reasons for deviations in O&M Expenses

From the above table, it is observed that the O&M expenses for the FY 2014-15, FY 2016-17, FY 2017-18 and FY 2018-19 are higher than the approved values of the Hon'ble Commission by Rs.260 Crs., Rs. 444 Crs. Rs. 475 Crs. and Rs. 503 Crs. respectively. But in FY 2015-16, the O&M expenses were on lower side than the approved values and also lower than the previous year actual mainly due to short provision of terminal benefits and leave encashment of Rs. 313.43 crore (Pension & Gratuity - Rs.311.31 crore and leave encashment -Rs 2.12 crore) as per actuarial valuation in the FY 2015-16.

The increase in Employee expenses and A&G expenses are commonly linked to inflation (Consumer Price Index) CPI and (Wholesale Price Index) WPI. Therefore, Employee Expenses have increased owing to inflation. Increase in CPI and WPI during the Third MYT Control Period are as depicted in the table below.

Particulars	FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	FY 2018-19
CPI (IW)	250.83	265.00	275.92	284.42	299.92
% Increase in CPI	6.29	5.65	4.12	3.08	5.45%
WPI	113.88	109.72	111.62	114.88	119.80
% Increase in WPI	1.26	(3.65)	1.73	2.92	2.96%

Source: Actual CPI - www.labourbureau.nic.in, Actual WPI - www.eaindustry.nic.in (Office of the Economic Advisor website)


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Further, O&M expenses have increased mainly due to the following reasons, which were not considered while fixing the O&M Cost target for the Distribution Business by the Hon'ble Commission.

- i. Wage Revision in 2014 and 2018
- ii. Regularization of outsourcing employees in 2017
- iii. Actuarial Valuation Report
- iv. Leave Encashment
- v. DA hike and new recruitment

a. Employee Expenses

i. Wage Revision Impact in 2014 and 2018:


During the FY 2014-15 and FY 2018-19, Pay Revision of the employees has taken place due to which pay was increased over the years from FY 2014-15 onwards and in FY 2018-19. The overall increase in the cost during the control period in the Employee Pay is 13%. Hence, the Licensee requests the Hon'ble Commission to provide a true-up to meet the shortfall in the O&M cost during 3rd control period. Major element wise Employee Cost details are as below detailing the wage revision impact:

Employee Cost (In Rs.Crs.)	FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	FY 2018-19	Increase over 5 years
Basic Pay	553.02	550.02	575.49	575.62	990.87	15%
D.A	23.91	49.82	87.72	108.43	27.11	
Other allowances	137.95	138.46	146.42	144.59	178.92	7%
EL Encashment	40.26	26.89	29.82	27.53	43.67	2%
Total	755.14	765.19	839.45	856.17	1240.57	13%

ii. Regularization of outsourcing employees in 2017

The charges pertaining to contract labour were majorly grouped under Repairs and Maintenance head of the O&M cost till FY 2015-16. During the Year 2016-17 the same were reclassified under Administration & General Expenses.

However, in FY 2017-18, on 29.07.2017, based on the orders of Hon'ble High Court, the contract labour have been designated as artisans by regularising their service. Hence the salaries paid to artisans who were grouped earlier under Administration & General Expenses are brought under Employee expenses of the O&M cost from FY 2017-18 onwards. Hence the remuneration paid to artisans became part of Employee cost from FY 2017-18 which have also contributed to the variation in actual employee costs vis-à-vis Commission approved costs.


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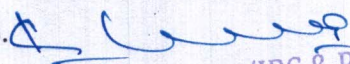
The salaries of the artisans during the control period is tabulated below

Year	Artisan Remuneration (Rs. In crs)
2014-15	159.59
2015-16	193.99
2016-17	216.54
2017-18	223.23
2018-19	296.37

iii. **Terminal Benefits as per Actuarial Valuation report:**

The Licensee has made the Actuarial Valuation towards Pension and Gratuity Provision and Final EL Encashment Provisions in respect of Employees retired/to be retired.

- For financial year 2014-15, based on actuarial valuation report as at 01.06.2014, the provisions for Pension Contribution and EL Encashment has been made in the books of accounts.
- But, during FY 2016-17, actuarial valuation was not done as at 31.03.2016, hence no provision for leave encashment and pension benefits was made in the accounts.
- However, during 2017-18, actuarial valuation as at 31.03.2017 has been done to arrive at present value of future obligations of the company and to provide for current year provision. Based on the actuarial report, total provision against terminal benefits and EL Encashment of Rs. 603 crores were made which includes prior period and current year provisions.
- Similarly, as at 31.03.2018, the licensee has made Rs. 895 crores towards pension & gratuity benefits of the employees on the roll which includes current year provisions of Rs. 68 crores and prior period provisions of Rs. 827 crores. There was an actuarial gain of Rs. 57.54 crores towards EL Encashment due to excess provision in the last year.
- For the Financial year 2018-19, the licensee has to provide Rs. 549.89 crores towards pension and Gratuity For employees joined before 1.02.1999, but an amount of Rs. 384.92 crores have been provided (@ 70 % of Rs. 549.89 crores) and the balance 30 % amount of Rs.164.96 crores is deferred to the next years due to pending final allocation of inter-state transfer of employees. Thus, a total provision of Rs. 386.04 crores have been provided for pension & gratuity benefits of all the employees on roll. An amount of Rs. 239.82 crores of provisions were made under Earned Leave Encashment based on the valuation reports.


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Provisions (In Rs. Crs.)	2014-15	2015-16	2016-17	2017-18	FY 2018-19
Pension and Gratuity benefits Provision	55.07	8.91	526.99	895.06	386.04
EL Encashment	222.84	0.00	76.15	(57.54)	239.82

b. A&G Expenses

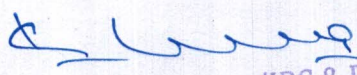
The Hon'ble Commission in the MYT order for 2nd Control period has considered payment to Manpower Hiring costs of contract labour under Administration & General Expenses. However, as mentioned in the earlier paras, it is considered in R&M Group till 2015-16 and reclassified in 2016-17 in Administration & General expenses Group in the Discom accounts. It is pertinent to mention that from the mid of 2017-18 these expenses are reclassified under Employee Expenses Group as per the orders on regularisation of contract labour. Due to this reason the Administration & General Expenses are lower by Rs. 620 crores in the control period.

Except Manpower hiring costs which is major expenditure in the Administration & General expenses, other costs such as travelling expenses, vehicle hire charges, Printing & Stationery, Advertisement expenses, payment to PAAs have shown increasing trend due to hike in fuel cost, commodity prices, labour costs etc.

The breakup of major costs incurred during 2014-15 to 2018-19 under A&G group is shown below.

All figures in Rs. Crs.

Activity *	FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	FY 2018-19
Payment to PAAs	10.76	11.54	12.94	12.72	18.39
Vehicle Hire charges	20.18	26.97	29.94	34.23	38.17
Manpower Hiring	1.66	2.13	210.11	84.19	14.56
Printing & Stationery	4.92	5.12	5.08	6.31	5.03
Advertisement Expenditure	1.52	2.92	2.25	2.65	1.46
Electricity charges	6.20	6.50	6.82	7.38	8.22
Travelling Expenditure	17.04	18.50	22.96	19.09	22.42


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c. Repairs & Maintenance Expenses

R&M expenses are linked to Gross Fixed Asset (GFA) which depends on capital expenditure. The Honble Commission has approved a norm of 1.92% of opening Gross fixed assets towards R&M costs in the MYT for third Control period.

However, the actual R&M expenses as a percentage of average Gross Fixed assets during the control period are ranging from 1% to 1.13%. This has shown overall reduction in R&M expenses as compared to Approved values. This is due to the reason that the charges pertains to contract labour are majorly grouped under Repairs and Maintenance head of the O&M cost till FY 2015-16. During the Year 2016-17 the same are reclassified under Administration & General Expenses. From 2017-18 onwards these charges are merged in Employee cost after regularizing the services of contract labour as Artisans as per the directions of Honble High Court.

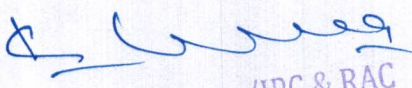
The repairs and maintenance cost of major network elements during the control period is tabulated below:

All figures in Rs. Crs

Repairs & Maintenance costs	FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	FY 2018-19
R&M - Sub Station	10.20	11.71	16.19	11.84	15.24
R&M - Transformer	44.00	35.99	36.32	37.30	40.44
R&M-Plant & Machinery	1.96	1.87	3.61	4.97	8.48
Maintenance labour	98.29	117.58	17.68	8.00	6.43
R & M -PTR	5.66	6.19	5.49	4.99	6.68
Manning - Sub Station	59.64	74.28	6.43	0.32	0.18
R&M-Cable Network	15.03	19.77	39.72	26.08	29.91
R&M-Meters & Metering Equipment	5.87	4.15	3.88	3.27	6.13
R & M Vehicles	3.70	1.30	0.30	0.74	1.32
R&M-Computer & IT Equipment	2.25	1.83	5.00	2.47	3.36
Maintenance. -Intangible Asset	0.00	0.00	0.00	3.45	0.00

7.1.2 Regulated Rate Base (RRB):

TSSPDCL's RRB at the end of the Third MYT Control period is **Rs. 4775 Crs.** against the Hon'ble Commission approval of Rs. 5840 Crs. Summary of RRB line items for FY 2014-15 to FY 2018-19 is as below:


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Name of the Parameter	2014-15			2015-16			2016-17			2017-18			2018-19		
	App	Act	Dev	App	Act	Dev	App	Act	Dev	App	Act	Dev	App	Act	Dev
Regulatory Rate Base	2224	2380	156	3008	3169	161	3921	4165	243	4881	4575	-306	5840	4775	-1065
Additions to GFA	1204	1043	-161	1504	1910	405	1637	1549	-88	1696	1260	-436	1739	1668	-71
Additions to Consumer Contribution	237	336	100	309	447	138	318	438	120	339	520	181	367	851	484
Working Capital	96	117	21	119	100	-19	191	164	-27	197	185	-12	205	212	6

Additions to GFA and Additions to Consumer Contribution have an impact on RRB. Deviation in total RRB is on account of higher Consumer Contributions and grants received than TSERC approved for the MYT Period from FY 2014-15 to FY 2018-19. The actual RRB is lower than approved RRB by Rs. 811 crores.

Reasons for deviations in RRB

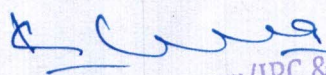
a. Additions to GFA:

The Commission has approved additions to gross fixed assets for the Third MYT control period at Rs. 7781 crores and the TSSPDCL actual additions is Rs. 7429 crores. As against the approved investments of Rs. 7763 crores, the DISCOM has made investments towards capital assets of Rs. 8162 crores in the Control period. Major investments in IPDS & DDUGJY schemes are happened in the last financial year of the Control Period which is one of the major contributors for excess expenditure during the Control period.

The scheme wise *major* Capital expenditure incurred during 2014-15, 2015-16, 2016-17, 2017-18 and 2018-19 is shown in the following table:

in Rs Crs.

Name of the Scheme	2014-15	2015-16	2016-17	2017-18	2018-19
SPA:PE SCHEMES	177.71	215.89	189.64	225.42	302.67
R-APDRP FOR 2009-10	10.46	17.90	2.39	8.14	2.10
R-APDRP PART-A-SCADA/DMS	1.64	2.09	12.15	2.94	4.40
R-APDRP PART -B 2011-12	298.36	269.17	162.30	40.77	5.20
JICA (HVDS) SCHEME-2014	53.52	218.98	178.33	54.50	13.33
SMARTGRID PROJECT-2014	0.64	2.31	1.16	0.29	19.40
IPDS SCHEME	-	0.00	0.48	91.64	407.14
DDUGJY SCHEME	-	0.00	0.00	16.79	255.80
CONTRIBUTED_CAPITAL	19.94	45.26	44.03	53.65	73.42
ROSC SCHEME	209.86	271.62	231.44	241.51	430.40
TS_WATER GRID PROJECT	-	8.59	11.16	47.60	1.71


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Name of the Scheme	2014-15	2015-16	2016-17	2017-18	2018-19
T&D SCHEME	245.01	316.21	394.92	455.12	453.52
SAFETY MEASURES SCHEME	0.13	0.52	41.81	16.91	21.23
T&D-9 HOURS AGL SUPPLY	-	184.74	170.96	36.18	6.18
T&D-24 HOURS AGL SUPPLY	-	0.00	0.00	2.84	7.00
CIVIL WORKS-T&D	5.48	7.57	14.02	11.29	13.45
GADA_SCHEME	0.80	7.52	2.76	0.63	0.16
SUBSTATIONS_BANK-2010	71.36	88.92	151.02	170.94	125.37
METERING SCHEME	64.77	10.95	12.04	32.16	30.57
Total	1159.68	1668.24	1620.62	1509.30	2173.05

Further, the Physical Completion Certificates (PCCs) & Financial Completion Certificates (FCCs) of the capitalised works are enclosed as Annexure – I in compliance to the Directive No. 3 of the Distribution Business Tariff Order for 4th Control Period (FY 2019-2024). Further the information regarding the capitalised works for the period from FY 2014-15 to FY 2018-19 is submitted as soft copy.

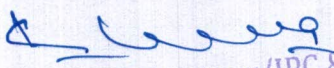
b. Additions to Consumer Contribution:

The Hon'ble Commission has approved Rs. 1570 crores towards additions to consumer contribution for the third control period. But the actual consumer contributions and grants received by the licensee is Rs. 2593 crores. The growth in consumer additions and the consumption is one of the factors for increase in consumer contributions than the approved levels. Further, in FY 2018-19, grants against IPDS, Smart grid and DDUGJY projects totaling Rs. 238 crores were received from M/s.PFC which has also contributed in the higher consumer contribution additions than the approved levels.

7.1.3 Return on Capital Employed (ROCE):

TSSPDCL's actual ROCE for the Third MYT Control period is **Rs 2233 Crs.** as against the Hon'ble Commission approved ROCE of **Rs. 2484 Crs.** resulting in a deviation of **Rs 251 crores.** Summary of Return on Capital Employed (ROCE) line items for FY 2014-15 to FY 2018-19 is as below.

Name of the Parameter	Rs. in Crores														
	2014-15			2015-16			2016-17			2017-18			2018-19		
	App	Act	Dev	App	Act	Dev	App	Act	Dev	App	Act	Dev	App	Act	Dev
Return on Capital Employed	278	234	(44)	376	333	(43)	490	559	69	610	565	(45)	730	542	(188)
Regulatory Rate Base	2224	2380	156	3008	3169	161	3921	4165	243	4881	4575	-306	5840	4775	-1065
Additions to GFA	1204	1043	-161	1504	1910	405	1637	1549	-88	1696	1260	-436	1739	1668	-71
Additions to Consumer Contributions	237	336	100	309	447	138	318	438	120	339	520	181	367	851	484
Working Capital	96	117	21	119	100	-19	191	164	-27	197	185	-12	205	212	6
WACC %	12.5	9.8	-2.7	12.5	10.5	-2.0	12.5	13.4	0.9	12.5	12.4	-0.1	12.5	11.4	-1.1
Cost of Debt %	12.0	8.4	-3.6	12.0	9.3	-2.7	12.0	13.2	1.2	12.0	11.8	-0.2	12.0	10.5	-1.5
Return on Equity %	14	14	0.00	14	14	0.00	14	14	0.00	14	14	0.00	14	14	0.00


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Deviation in total ROCE is on account of deviation in RRB and cost of debt from TSERC approved figures for the MYT Period from FY 2014-15 to FY 2018-19. Decrease in interest rate is one of the reasons for decrease in ROCE, which is detailed below.

Reasons for deviations in ROCE

Regulatory Rate Base (RRB):

The actual RRB at the end of the control period is lower than the approved value by Rs. 1065 crores due to higher consumer contributions and variation in opening balance approved for the first year of Control period in the MYT Tariff order vis-à-vis actuals.

Weighted Average Cost of Capital (WACC):

The average cost of debt of the TSSPDCL is around 8.4 %, 9.3%, 13.2%, 11.8% and 10.5% for the five years i.e. 2014-15 to 2018-19 as against the approved cost of debt at 12.5 %. The lower WACC than the approved 12.5% p.a. in the control period is also an important contributor for lesser Return on Capital employed.

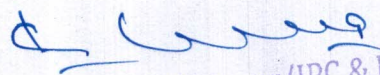
7.1.4 Depreciation:

Actual Gross Depreciation for the Third MYT Control Period is **Rs. 3303 Crs.** compared to **Rs. 3173 Crs.** approved by the Hon'ble Commission. Summary table of Gross Depreciation for FY 2014-15 to FY 2018-19 has been provided below.

Name of the Parameter	2014-15			2015-16			2016-17			2017-18			2018-19		
	App	Act	Dev	App	Act	Dev	App	Act	Dev	App	Act	Dev	App	Act	Dev
Depreciation during the year	497	457	(40)	562	545	(17)	635	673	39	705	772	68	774	856	81

Reasons for deviations in Depreciation

- Depreciation is been calculated from the date of Capitalization of the asset unlike the Hon'ble Commission's methodology of computing depreciation on Opening Balance of Fixed Assets for the financial year.
- Change in Opening balance of asset base considered in the Tariff order for initial year of the control period and difference in year-on-year asset additions vis-à-vis actuals are the two major reasons contributing to the variation in depreciation.


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7.1.5 Taxes on Income:

The Hon'ble Commission approved **Rs.129 Crs.** as taxes on income for the Third MYT Control period, whereas during the control period the Company has not paid any taxes on income.

Summary of Taxes on Income for FY 2014-15 to FY 2018-19 is provided below.

Name of the Parameter	2014-15			2015-16			2016-17			2017-18			2018-19		
	App	Act	Dev	App	Act	Dev	App	Act	Dev	App	Act	Dev	App	Act	Dev
Taxes on Income	14	0	(14)	19	0	(19)	25		(25)	32		(32)	38	0	(38)

7.1.6 Special Appropriation for Safety Measures:

The Hon'ble Commission approved **Rs. 200 Crs.** towards Special Appropriation for Safety Measures for the Third MYT Control Period. Summary of Special Appropriation for Safety Measures for FY 2014-15 to FY 2018-19 is as below.

Name of the Parameter	2014-15			2015-16			2016-17			2017-18			2018-19		
	App	Act	Dev	App	Act	Dev	App	Act	Dev	App	Act	Dev	App	Act	Dev
Special appropriation For safety measures	30	0	(30)	35	0	(35)	40	0	(40)	45	0	(45)	50	0	(50)

Reasons for deviations in Special Appropriation for Safety Measures

The licensee has incurred the following capital works expenses towards safety measures.

- Erection of intermediate poles for proper clearance
- Providing of Earthing
- Providing of fencing
- Reconstruction of damaged DTR plinth
- Plinth Raisings
- Providing of SMC Distribution boxes
- Providing of foot Cross arms
- Rectification of DTR structures
- Replacement of damaged AB cable
- Providing of safety materials viz. Gum boots, Helmets, Safety belt, Earth rods, Gloves etc.
- Running of Neutral wire from SS.

All figures in Rs. Crs.

Particulars	FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	FY 2018-19	Total
Expenditure incurred towards safety measures	0.13	0.52	41.81	16.91	21.23	80.6

[Signature]
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As the expenditure incurred towards safety measures is considered in the capital expenditure, the same has not reflected under this head.

7.1.7 Other Expenditure:

The Other Expenditure for the Third MYT Control Period incurred is **Rs.54.2 Crs** against to the approved expenses of **Rs. 2.7 crores**. Summary of Other Expenditure for FY 2014-15 to FY 2018-19 has provided below.

Name of the Parameter	2014-15			2015-16			2016-17			2017-18			2018-19		
	App	Act	Dev	App	Act	Dev	App	Act	Dev	App	Act	Dev	App	Act	Dev
Other expenditure	0.5	1.0	0.5	0.5	5.7	5.2	0.5	9.6	9.1	0.6	16.2	15.6	0.6	21.6	21.1

The DISCOM has incurred expenditure of Rs.45.52 crores towards compensation for injuries, Death and Damages. The year wise expenditure is tabulated below

Particulars	FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	FY 2018 -19
Compensation for Injuries, Death and Damages	1.01	5.66	9.61	15.16	14.08
Others	0.00	0.00	0.00	1.03	7.61
Total	1.01	5.66	9.61	16.19	21.69

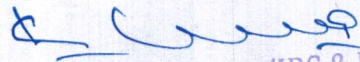
7.1.8 Non-Tariff Income & Wheeling Revenue:

The approved Non-Tariff income in the 3rd MYT Distribution Tariff order includes Non-tariff income of the Distribution Business, Revenue estimates from wheeling charges and the amortisation of depreciation on consumer contributed assets.

The Hon'ble Commission has approved Rs. 1646 crores under Non-Tariff Income Projections for the Third MYT. The DISCOM has earned Non-Tariff Income including Revenue from wheeling charges and amortisation of depreciation on consumer contributed assets during the third MYT is Rs. 1545 crores. There is decrease in revenue from NTI by Rs. 101 crores Summary of Non-Tariff income is tabulated below:

Name of the Parameter	2014-15			2015-16			2016-17			2017-18			2018-19		
	App	Act	Dev	App	Act	Dev	App	Act	Dev	App	Act	Dev	App	Act	Dev
Non-Tariff income	241	264	23	326	292	(34)	321	323	3	363	229	(134)	395	437	41

The item wise actual Non-Tariff Income, Revenue from Wheeling charges and amortisation of depreciation on consumer contributed assets is detailed below


 Chief General Manager/IPC & RAC
 TSSPDCL, Corporate Office,
 Mint Compound, Hyderabad-500 063.

All figures in Rs. Crs.

Particulars	FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	FY 2018 -19
Incidental Charges-Work	33.37	37.15	36.30	44.06	50.58
Sale of Scrap	8.67	3.51	-0.65	1.89	3.24
Penalties from Suppliers	4.35	3.46	7.55	6.87	12.47
SDs & BGs forfeited	0.00	2.92	3.09	4.74	30.08
Price Variation	(9.44)	2.21	4.84	-5.05	0.00
Rebate from Funding Agency	0.14	1.04	0.79	0.26	0.02
Miscellaneous income	3.75	0.8	1.59	-1.73	2.44
Sale of Tender Schedule	0.25	0.34	0.26	0.22	0.34
Rent from Fixed Assets	0.27	0.31	0.24	0.30	0.31
Meter Testing Charges	0.15	0.25	0.23	0.61	0.49
Registration Fees	0.14	0.19	0.46	0.49	0.45
Interest on Staff loans & advances	0.09	0.07	0.14	0.26	0.29
Penalty from employees	0.00	0.02	0.02	0.03	0.19
Transformer Testing Charges	0.00	0.01	0.03	0.01	0.00
Total NTI for Distribution Business (a)	41.75	52.28	54.89	52.95	100.9
Revenue from Wheeling charges (b)	0.22	1.15	4.64	27.23	24.46
Amortisation of depreciation on consumer contributed assets (c)	222.23	238.61	263.71	148.52	311.49
Total NTI (a)+(b)+(c)	264.21	292.04	323.43	228.69	436.85

7.1.9 Impact of FRP & UDAY

The Company was covered under the Financial Restructuring Package 2012 of Government of India in 2012. In accordance to the package, the then state government has assumed the liability of the DISCOM (erstwhile APCPDCL) to the extent of Rs. 4026 crores which covers the short-term borrowings of the company towards expensive power. Thus, the FRP covers the liability of the DISCOM towards borrowings for expensive power which was not admitted by the Hon'ble Commission in the Fuel Surcharge Adjustments/Power purchase True-ups. **Hence the impact of FRP cannot be considered under the True-ups of the DISCOM.**

Subsequently in 2017, Telangana Discoms entered in to UDAY scheme and as per the agreement, total outstanding debt balance of TSSPDCL of Rs.5550.21 crores (75% of total outstanding) as on 21.02.2017 has been taken over by Government of Telangana. The GoTS has released Rs. 4593.84 crores in 2016-17 and Rs.282.93

[Signature]
Chief General Manager/IPC & TAC
TSSPDCL, Corporate Office
Mint Compound, Hyderabad-500 063

crores in 2017-18 in the form of Equity. The outstanding loans of the Discoms which includes long –term and short-term borrowings has been taken over by the GoTS in the form of Equity infusion in the DISCOMs. Therefore as per the Regulation mandate, though DISCOM has savings through interest & principle repayment portion of loans but since the same has been taken as equity infusion by GoTS but not as a capital grant it attracts Return on Equity @ 14% p.a as per Regulation 4 of 2005.

The Hon'ble Commission in the MYT Tariff Order for 3rd Control Period has approved debt-equity norm of 75:25 where 25% of equity attract 14% of Return on Capital employed (& 2% of Supply margin) and 75% of debt shall assume cost of finance of 12%.

As per Clause 5.11 (b) of National Tariff Policy, 2016, "For financing of future capital cost of projects, a Debt: Equity ratio of 70:30 should be adopted. Promoters would be free to have higher quantum of equity investments. **The equity in excess of this norm should be treated as loans advanced at the weighted average rate of interest.....**"

Thus, the equity in excess of 25% shall be treated as normative loan and weighted average rate of interest has to be allowed, thus debt-equity mix of 75:25 has to be maintained for FY 2016-17 as per the norms approved and guidelines of Tariff Policy, 2016.

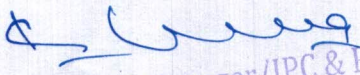
Therefore, no benefit has been accrued to the DISCOM due to UDAY as the equity infusion by the GoTS attracts return on equity of 14% which is higher than the cost of debt that would have incurred in the absence of UDAY scheme.

Further, it is noteworthy to mention that the loans taken under UDAY also comprises FRP & other loans taken to meet the working capital requirements and these costs of finance are not allowed as a pass through under Distribution or Retail Supply Business.

The GoTS has taken over Rs. 5550 crores of loans of TSSPDCL under UDAY agreement. The Breakup of capital expenditure loans and Working capital loans taken over by GoTS under UDAY is tabulated below:

Total Loans taken over under UDAY Scheme	5,550.00	Crs.
CAPEX Loans	1,851.40	Crs.
Working Capital Loans	3,698.60	Crs.

The Honble Commission has not considered any interest of working capital loans for power purchase in the Retail Supply ARR. Only loans to meet capital expenditure have been considered in the Distribution Business ARR.


 Chief General Manager/IPC & RAC
 TSSPDCL, Corporate Office,
 Mint Compound, Hyderabad-500 063.

But, the Honble Commission has computed the savings as INR 743.88 Crores for TSSPDCL for each year of FY 2017-18 and FY 2018-19 in respective Retail Supply Tariff Orders which includes savings towards capital expenditure loans and working capital loans for each year. These savings were already considered as pass through in the Retail Tariffs for FY 2017-18 and FY 2018-19. Therefore, the DISCOM prays before the Honble Commission to

- Consider the loans taken under UDAY by GoTS as equity infusion.
- Consider no savings on loans under UDAY scheme for the DISCOM and the computed savings of Rs. 1487.76 crores (for two years) which was already passed through the tariffs in retail supply Tariff Order FY 2017-18 and FY 2018-19, may be added back to the True-ups of third control period i.e. FY 2014-15 to FY 2018-19.

Hence, the DISCOM prays the Hon'ble Commission to allow the True-ups for the 3rd control period entirely as per the Regulation.

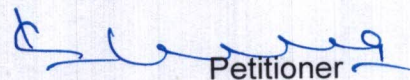
Particulars	Rs. in crores
Third Control Period Gap	1300.69
Add: Savings already considered in the Retail Supply Tariff Order FY 2017-18 & FY 2018-19	1487.76
Total True-up Gap	2788.45

Further, in compliance to the Directive No. 3 of the Distribution Business Tariff Order for 4th Control Period (FY 2019-2024), the details of the loans taken over under UDAY scheme is enclosed as Annexure -II.

8 Prayer

The Petitioner (Distribution Licensee) prays that the Hon'ble Commission may:

- Take the accompanying application of TSSPDCL on record and treat it as complete;
- Approve the true-up of expenses and revenue for the Distribution Business for the Third MYT Control Period (FY 2014-15 to FY 2018-19);
- Approve Distribution Business True-up of Rs. 2788.45 Crs. for the Third MYT Control Period;
- Grant suitable opportunity to TSSPDCL within a reasonable time frame to file additional material information that may be subsequently required;
- Pass such order as the Hon'ble Commission may deem fit and proper in the facts and circumstances of the case.


Petitioner

Place: Hyderabad

Dated: 01/09/21

Chief General Manager/IPC & RAC
TSSPDCL, Corporate Office,
Mint Compound, Hyderabad-500 068.

**BEFORE THE HONOURABLE TELANGANA STATE ELECTRICITY
REGULATORY COMMISSION**

At its Office at 5th Floor, Singareni Bhavan, Red Hills, Hyderabad - 500004

FILING NO. _____/2021

CASE NO. _____/2021

In the matter of:

Filing of Distribution Business true ups for the Third Control period (FY 2014-15 to FY 2018-19) in accordance with the "Andhra Pradesh Electricity Regulatory Commission (Terms And Conditions For Determination Of Tariff For Wheeling And Retail Sale Of Electricity) Regulation, 2005" as adopted by Telangana State Electricity Regulatory Commission vide Regulation No. 1 of 2014 and in accordance with Directive No. 3 of Wheeling Tariff Order for Distribution Business for 4th Control Period (FY 2019-2024).

In the matter of:


SOUTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED

... Applicant

AFFIDAVIT OF APPLICANT VERIFYING THE ACCOMPANYING PETITION

I, P. Krishnaiah, S/o P. Ramulu, aged 57 years, Occupation: Chief General Manager (IPC & RAC), TSSPDCL, Hyderabad, R/o Hyderabad do solemnly affirm and say as follows:

- 1) I am Chief General Manager (IPC & RAC)/TSSPDCL, I am competent and duly authorized by TSSPDCL to affirm, swear, execute and file this affidavit in the present proceedings.
- 2) I have read and understood the contents of the accompanying application drafted pursuant to my instructions. The statements made in the paragraphs of accompanying application now shown to me are true to my knowledge derived from the official records made available to me and are based on information and advice received which I believe to be true and correct.

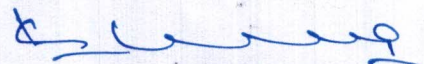


DEPONENT

Chief General Manager/IPC & RAC
TSSPDCL, Corporate Office,
Mint Compound, Hyderabad-500 063.

VERIFICATION

The above named Deponent solemnly affirm at Hyderabad on this 1st day of September, 2021 that the contents of the above Affidavit are true to my knowledge no part of it is false and nothing material has been concealed there from.



DEPONENT

Chief General Manager/IPC & RAC
TSSPDCL, Corporate Office,
Mint Compound, Hyderabad-500 063.

Solemnly affirmed and signed before me.


SUPERINTENDING ENGINEER/RAC
TSSPDCL, Corporate Office,
6-1-50, Mint Compound,
HYDERABAD-500 063.

TSSPDCL
Annexure II

75% of total debt to be taken over by GoTS of TSSPDCL

(Rs. In Crores)

Sl. No.	Name of the FI	Outstanding Balance as on	Name of the Bank
(1)	(2)	(5)	(6)
1	REC - Regular	0.32	State Bank of Hyderabad
2	PFC - System Improvement	10.96	State Bank of India
3	PFC - Term Loan	100.00	State Bank of India
4	REC - Regular	38.08	State Bank of Hyderabad
5	REC - TSPCC	183.35	State Bank of Hyderabad
6	PFC - Term Loan	400.00	State Bank of India
7	REC - Regular	779.38	State Bank of Hyderabad
8	REC - JBIC	0.71	State Bank of Hyderabad
9	REC - TSSPDCL	569.34	State Bank of Hyderabad
10	REC - RGGVY	1.55	State Bank of Hyderabad
11	Corporation Bank	105.08	Corporation Bank
12	REC - Regular	3.72	State Bank of Hyderabad
13	REC - TSSPDCL	69.88	State Bank of Hyderabad
14	REC - RGGVY	1.42	State Bank of Hyderabad
15	REC - Regular	375.42	State Bank of Hyderabad
16	REC - TSSPDCL	0.22	State Bank of Hyderabad
17	REC - RGGVY	0.19	State Bank of Hyderabad
18	REC - Regular	81.10	State Bank of Hyderabad
19	REC - RGGVY	5.56	State Bank of Hyderabad
20	SBH, Gunfoundry(T&D &SS)	91.80	State Bank of Hyderabad
21	SBH, Gunfoundry(T&D &SS)	142.85	
22	ANDHRA BANK	121.36	Andhra Bank
		74.69	Andhra Bank
23	BANK OF INDIA	74.69	Bank of India
		56.01	Bank of India
24	CBI	93.36	Central Bank of India
25	FEDERAL BANK	27.60	Federal Bank
26	IOB	92.44	Indian Overseas Bank
27	INDIAN BANK	130.70	Indian Bank
28	PUNJAB & SIND BANK	74.68	Punjab & Sind Bank
29	SBH	51.48	State Bank of Hyderabad
30	VIJAYA BANK	112.03	Vijaya Bank
31	SBH Gunfoundry (T&D)	90.36	State Bank of Hyderabad
32	REC - JBIC	11.01	State Bank of Hyderabad
33	Canarabank (HVDS)	22.02	Canara Bank
34	REC - JBIC	0.36	State Bank of Hyderabad
35	REC - JBIC	9.56	State Bank of Hyderabad
36	Canarabank (T&D)	60.31	Canara Bank
37	Syndicate bank(T&D)	217.80	Syndicate Bank
38	Syndicate bank (T&D and SS)	89.95	Syndicate Bank
39	Andhra Bank	216.69	Andhra Bank
40	Bank of India	144.46	BANK OF INDIA
41	Central Bank of India	103.19	CENTRAL BANK OF INDIA
42	Federal Bank	30.96	FEDERAL BANK LTD
43	IOB	103.19	INDIAN OVERSEAS BANK
44	Indian Bank	144.46	INDIAN BANK
45	Punjab & Sind Bank	82.55	PUNJAB & SIND BANK
46	STATE BANK OF MYSORE	23.17	STATE BANK OF MYSORE
47	SYNDICATE BANK	144.46	Syndicate Bank
48	SBH	61.91	State Bank of Hyderabad
49	Vijaya Bank	123.83	VIJAYA BANK
	TOTAL	5550.21	

Chief General Manager/IPC & BAC
TSSPDCL, Corporate Office,
Mint Compound, Hyderabad-500 063.



- (i) **Equity infusion under UDAY Scheme:** During the Financial Year 2016-17 and 2017-18 an amount of Rs. 4,593.84 Crore and Rs. 282.98 Crore are received under the Ujwal Discom Assurance Yojana (UDAY) Scheme totalling Rs. 4876.83 Crore for which share allotment was not done as at 31.03.2018 but on 02.05.2018 share allotments are made and as such it has been form part of Share capital for the year ended 31.03.2019.

During the year, 2016-17 the Govt. of Telangana has released funds in the form of "Equity Infusion" for an amount of Rs. 1,583.83 Crore towards the payment of TS Genco Dues, Electricity Duty, VAT and Royalty Dues to be payable to the State Government and as on 31.03.2018 share allotment not done and the same is kept under the share application money pending allotment of shares and on 02.05.2018 share allotment was made and accordingly, it has been included in the share capital for the year ended 31.03.2019.

During the year, 2017-18 the Govt. of Telangana has released funds in the form of "Equity Infusion" for an amount of Rs. 1,748.79 Crore towards the payment of TS Genco Dues, Electricity Duty, payable to the State Government and the shares are not allotted as on 31.03.2018 and the same is kept under the share application money pending allotment of shares and on 02.05.2018 share allotment was made and accordingly, it has been included in the share capital for the year ended 31.03.2019.

During the year, 2018-19 the Govt. of Telangana has released funds in the form of "Equity Infusion" for an amount of Rs. 1,680.00 Crore towards the payment of power purchase dues of TSSPDCL and for which share allotment was made 20.03.2019 and accordingly, it has been included in the share capital for the year ended 31.03.2019.

To sum up Rs. 4,876.83 Crore under the UDAY Scheme and Rs. 5,012.62 Crore in the form of Additional Investment Discoms totalling to Rs. 9,889.46 Crore worth of Share capital increased for the Financial Year ended 31st March, 2019.

- a. The Govt. of Telangana takeover Loans for an amount of Rs. 5,550.21 Crore of TSSPDCL under UDAY Scheme and out which an amount of Rs. 4,876.83 Crore released and the balance amount of Rs. 673.38 Crore are not received as on 31.03.2019.

3 Reserves & Surplus

Particulars	As at March 31, 2019 ₹	As at March 31, 2018 ₹
a. Consumer Contribution towards capital assets		
Opening Balance	39,30,03,89,314	35,12,01,18,101
(+) Current year Receipts	6,12,56,74,944	4,05,10,21,018
Transfer on Merger-Husnabad	0	16,63,73,373
Transfer on Demerger-Gundala	0	(3,71,23,178)
Closing Balance	45,42,60,64,258	39,30,03,89,314
b. Subsidies towards cost of capital assets		
Opening Balance	73,22,15,367	71,24,09,999
(+) Current year Receipts		0
Transfer on Merger -Husnabad		2,04,15,011

**BEFORE THE HONOURABLE TELANGANA STATE ELECTRICITY REGULATORY
COMMISSION**

AT ITS OFFICE AT 5th Floor, Singareni Bhavan, Red Hills, Hyderabad - 500 004

FILING NO. _____/2021

CASE NO. _____/2021

In the matter of:

Filing of Petition for condoning the delay in filing of Distribution Business true up petition for the Third Control period (FY 2014-15 to FY 2018-19) in accordance with the "Andhra Pradesh Electricity Regulatory Commission (Terms And Conditions For Determination Of Tariff For Wheeling And Retail Sale Of Electricity) Regulation, 2005" as adopted by Telangana State Electricity Regulatory Commission vide Regulation No. 1 of 2014 and in accordance with Directive No. 2 of Wheeling Tariff Order for Distribution Business for 4th Control Period (FY 2019-2024).

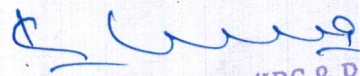
In the matter of:

SOUTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED

... Applicant

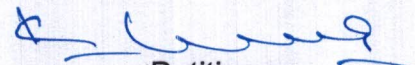
The Applicant respectfully submits the reasons for delay in filing Distribution Business true ups for the 3rd control period (FY 2014-15 to FY 2018-19) as under :-

1. The Honble Commission in its Distribution Business Tariff Order for 4th MYT period dt.29.04.2020 has issued a directive (*Directive No.3*) to submit the True-up for 1st, 2nd & 3rd Control periods along with requisite supporting documents such as Physical Completion Certificates (PCCs) and Financial Completion Certificates (FCCs).
2. In light of the above, it is to submit that as the PCCs and FCCs are sought for the historical years and in view of vast number of capital works undertaken by DISCOM every year, the DISCOM has faced difficulty in collecting and collating the information related to the capitalised works during the 3rd control period.
3. Further, due to continued lockdown for (6) months across the country on account of COVID-19 pandemic, the works in the HQ got hampered which caused further delay in filing the True-ups for 3rd control period (FY 2014-15 to FY 2018-19) within the stipulated date as directed by the Honble Commission.


Chief General Manager/IPC & RAC
TSSPDCL, Corporate Office,
Mint Compound, Hyderabad-500 063.

4. In the aforesaid circumstances, the applicant respectfully prays the Honble Commission

- a) to take the petition for condoning the delay in filing Distribution Business true up petition for 3rd control period (FY 2014-15 to FY 2018-19);
- b) To consider the reasons mentioned under the circumstances submitted;
- c) Pass such order as the Hon'ble Commission may deem fit and proper in the facts and circumstances of the case.



Petitioner

Chief General Manager/IPC & RAC
TSSPDCL, Corporate Office,
Mint Compound, Hyderabad-500 063.

Place: Hyderabad

Dated: 01/09/21

**BEFORE THE HONOURABLE TELANGANA STATE ELECTRICITY
REGULATORY COMMISSION**

At its Office at 5th Floor, Singareni Bhavan, Red Hills, Hyderabad - 500004

**FILING NO. _____/2021
CASE NO. _____/2021**

In the matter of:

Filing of Petition for condoning the delay in filing of Distribution Business true up petition for the Third Control period (FY 2014-15 to FY 2018-19) in accordance with the "Andhra Pradesh Electricity Regulatory Commission (Terms And Conditions For Determination Of Tariff For Wheeling And Retail Sale Of Electricity) Regulation, 2005" as adopted by Telangana State Electricity Regulatory Commission vide Regulation No. 1 of 2014 and in accordance with Directive No. 2 of Wheeling Tariff Order for Distribution Business for 4th Control Period (FY 2019-2024).

In the matter of:


SOUTHERN POWER DISTRIBUTION COMPANY OF TELANGANA LIMITED

... Applicant

AFFIDAVIT OF APPLICANT VERIFYING THE ACCOMPANYING PETITION


I, P. Krishnaiah, S/o P. Ramulu, aged 57 years, Occupation: Chief General Manager (IPC & RAC), TSSPDCL, Hyderabad, R/o Hyderabad do solemnly affirm and say as follows:

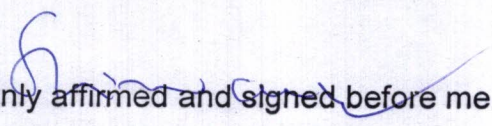
- 1) I am Chief General Manager (IPC & RAC)/TSSPDCL, I am competent and duly authorized by TSSPDCL to affirm, swear, execute and file this affidavit in the present proceedings.
- 2) I have read and understood the contents of the accompanying application drafted pursuant to my instructions. The statements made in the paragraphs of accompanying application now shown to me are true to my knowledge derived from the official records made available to me and are based on information and advice received which I believe to be true and correct.


DEPONENT
Chief General Manager/IPC & RAC
TSSPDCL, Corporate Office,
Mint Compound, Hyderabad-500 063.

VERIFICATION

The above named Deponent solemnly affirm at Hyderabad on this 1st day of September, 2021 that the contents of the above Affidavit are true to my knowledge no part of it is false and nothing material has been concealed there from.


DEPONENT
Chief General Manager/IPC & RAC
TSSPDCL, Corporate Office,
Mint Compound, Hyderabad-500 063.


Solemnly affirmed and signed before me.

SUPERINTENDING ENGINEER /RAC
TSSPDCL, Corporate Office,
6-1-50, Mint Compound,
HYDERABAD-500 063.