



# MANISHRENI FERROALLOYS Pvt. Ltd.,

**Factory :** Sy.No.1302 to 1305, Thurupupalli Village, Anantarajupeta (P), Railway Koduru(M)

**Kadapa Dist. A.P, India. Pin - 516105. Mobile No.+91 80083 33391 & +91 92468 22579**

**Email: manishreni@gmail.com Website : www.manishreni.com GST No: 37AAFCM3460Q1ZX**

To

Date: January 08, 2024

The Secretary,

Hon'ble A.P.Electricity Regulatory Commission,

Singareni Bhavan, Red Hills,

HYDERABAD.

Sir,

Sub: ARR and Tariff applications filed by Discoms for the year 2024-25 – filing

of submissions/suggestions by Manishreni Ferro Alloys P. Ltd – reg.

Ref: Notification of Tariff proposals for Retail Supply Business for the year 2024-25.

In response to the Notification, Manishreni Ferro Alloys P. Ltd files

Its submissions/suggestions to the A.P.Electricity Regulatory Commission

Against the Tariff proposals of Retail Supply Business by SPDCL for the year 2024-25.

We are enclosing herewith the copies of receipts of couriers sent to SPDCL,

As a proof of having served the copies of our submission to Discoms.

We request the Hon'ble Commission to grant permission for personal hearing

And to make Additional submissions at the time of public hearings.

Thanking you,

Yours faithfully,

For Manishreni Ferro Alloys P, Ltd

(P. Vijay Gopal Reddy)

Encl: as above.

Cc to: The Chief General Manager (RAC & IPC)

**BEFORE THE HONOURABLE ANDHRA PRADESH ELECTRICITY  
REGULATORY COMMISSION  
AT ITS OFFICE AT 4<sup>th</sup> Floor, Singareni Bhavan, Red Hills,  
Hyderabad – 500 004.**

In the matter of

Filing of the ARR & Tariff applications for the Retail Supply business for the FY 2023-24 under Multi-Year Tariff principles in accordance with the "Andhra Pradesh Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff for wheeling and Retails Sales of Electricity) Regulation, 2005" by the Southern Power Distribution Company of Andhra Pradesh Limited ('APSPDCL' or the Company' or the Licensee ) as the Distribution and Retail Supply Licensee.

In the matter of

**SOUTHERN POWER DISTRIBUTION COMPANY OF ANDHRA PRADESH**

Between:

Southern Power Distribution Company of Andhra Pradesh

And

**MANISHRENI FERROALLOYS Pvt. Ltd**

At the outset, We commend the DISCOMs for not only Containing the Power Purchase Cost but also reducing it marginally for the year 2024-'25.

Similarly, Aligning the Agricultural Consumption with the Solar Production hours on the Demand side Management, Utilization of available Hydel Projects for Pumped Storage and also promoting substantial investments in Pumped Storage Projects in the State are steps in the right direction. Also Adoption of metering of agricultural Pump sets and the DBT initiative need to be successfully carried forward to their logical end so that the gains percolate into the entire ecosystem.

While the above aspects are encouraging, we are dismayed at the DISCOMs' proposal for higher Power Procurement reflecting higher T& D loss levels (10.34%) than achieved in the current year (10.09%). We are unable to understand that while large investments are being made in strengthening Transmission and Distribution Networks, DISCOMs are planning for higher Losses. Does it imply that, more accurate reading of the Agricultural Consumption in view of metering will bring out the realistic levels! We request Hon'ble Commission to kindly examine.

It is also to be noted that there is a surplus availability of Energy even at the lower PLF level of operation of APGENCO plants. Additional Power Purchases proposed may be looked into by taking the cushion available by operating at optimum PLF into consideration.

In view of the Surplus Potential available, it would be prudent to bring in Load Factor Incentive to promote higher Sales . In view of reduced tariff, Consumers will not migrate to open access leading to a win-win situation for both DISCOMs and Consumers.

In the context of Climate Change our State with its long coastline and dependence on Agriculture makes it more susceptible to extreme climate events. Hence we should be more proactive in adopting Climate Change mitigation measures by promoting Renewable Energy in a big way. Fortunately for us , the State is endowed with good potential of Wind, Solar and Hydel resources to exploit. No doubt the State Government is promoting Green Hydrogen Mission for both Energy as well as for Production of Ammonia for Fertilizer, but there is more room for higher levels of absorption of Renewable Energy . Neighboring State of Tamilnadu is aiming at 75% Energy from RE sources in future as per News Reports and this has to be emulated.

Wider Adoption of Rooftop Solar and popularizing KUSUM scheme will benefit large sections of population providing supplementary incomes while creating more employment opportunities and reduce loss levels for DISCOMs also as consumption will be taking place locally which will also avoid need for larger investments on creating Transmission facilities for isolated Mega-Projects.

For the Industrial Consumers, the Draft ' Green Open Access, Charges and Banking Regulations-2023 ' proposed may be expeditiously adopted as the ISTS charges waiver is a time bound measure and we may miss out the opportunity if delayed. In the draft proposal, a ceiling of 30% of DISCOM consumption has been proposed for Banking of Renewable Energy; We request that to encourage RE adoption and to make our Industry competitive, the Ceiling on Banked Energy may be removed for a few years and meanwhile Energy Storage Infrastructure will be in place given proper support by State Government as VGF and PLI are proposed by Central Government for Energy Storage.

Coming to the Energy Intensive Category, we are amused that a separate subcategory for PLI Scheme beneficiaries has been created with an Energy tariff of Rs. 4 / KWH without Demand Charges etc. We welcome the promotional offer for new enterprises but are peeved at the ruthless manner the existing Energy Intensive Consumers have been stripped of their benign treatment by introducing Demand Charges, Increased Electricity Duty along with a plethora of FPPCA and True up charges at one go until the State Government had come to the rescue of the beleaguered Industry by providing Subsidies towards Waiver of 90% Demand Charges and the Increase in Electricity Duty of 94 paise.

Hence we request the Hon'ble Commission to kindly drop the imposition of Demand Charges for the Energy Intensive Category as it was existing previously and also advise the State Government to exempt Energy Intensive Category from Increase in Electricity Duty in view of their adverse impact by putting the survival of the Sector at risk.

We also bring to the notice of the Hon'ble Commission that the 33 KV Industrial Consumers are being levied higher tariffs disproportionate to their Cost of Service . While the difference in Cost of Service between 33 kV and 132 KV consumers is about 20 paise, the Tariff Difference is about 45 paise implying the 33 KV Consumers have to suffer higher Cross Subsidy burden. Such a treatment of the smaller consumers is against the principles of Natural Justice and is debilitating the vulnerable in scale of operations by resorting to this unjust practice of undue enrichment of DISCOMs.

Hence we request Hon'ble Commission to please reduce the Tariff of 33 kV Consumers in line with the Industrial Consumers in TamilNadu, Karnataka and Gujarat where both the tariffs at 132 KV and 33 KV are almost equal and thereby restore equity in this long pending issue.

**PRAYER:**

1. Request to kindly exempt Energy Intensive Category from levy of Demand Charges.
2. Reduce the 33 KV Consumer's Tariff aligning with COS.

3. Adopt Green Open Access, Charges and Banking Regulations-2023 without ceiling of 30% DISCOM's consumption for Banking of Renewable Energy.

4. Advise State Government to exempt Energy Intensive Category from increase in Electricity Duty by 94 paise.

Thanking You.

Yours Sincerely,

For Manishreni Ferro Alloys P, Ltd

  
(P. Vijay Gopal Reddy)

Cc: The Secretary, APERC, D No. 11-4-660, 4th Floor, Singareni Bhavan, Red Hills, Hyderabad-004