

Date: 08.01.2024

From
The Managing Director
Bandaru Energies Pvt Ltd
Somajiguda, Hyderabad – 82

To
The Commission Secretary
Andhra Pradesh Electricity Regulatory Commission
11-4-660, 4th Floor, SingareniBhavan, Red Hills
Khairatabad, Hyderabad: 500 004

Sub: APERC Public Notice Dt: 10.12.2023. Filing of the ARR & Tariff applications for the Distribution business for the 5th Control Period FY 2024-25 to FY 2028-29 under multi-year tariff principles in accordance with 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 - The filings for the Retail Supply Business for FY2024-25 and the Distribution Business for the 5th Control Period have been taken on the record by the Hon’ble Commission in O.P.No. 72 of 2023 and O.P.No. 75 of 2023 respectively. **Our Suggestions - Reg.**

Respected Sir,

We thank the Hon’ble Commission for its decision to submit the views/objections/suggestions from consumers, In response to the Public Notice Dt: 10.12.2023, we humbly submit our suggestions and the reasons thereof for certain Inclusions & Amendments to please be made to the Draft Regulation as below:

➔ **Serial Number 5: The ARR and Proposed Tariffs for Distribution Business for the 5th Control Period are given below:**

SOTHERN POWER DISTRIBUTION COMPANY OF AP LIMITED (APSPDCL)						
Sl.No.	Particulars	FY 2024-25	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29
A) ARR, Wheeling Charges & Wheeling Losses (%)						
2	Wheeling Charges (Long Term OA)					
	33 KV (Rs/kVA/Month)	83.17	119.6	162.45	193.84	214.42
	11 KV (Rs/kVA/Month)	964.49	1098.2	1268.28	1367.17	1431.84
	LT KV (Rs/kVA/Month)	1262.89	1477.11	1740.13	1911.89	2041.81
3	Wheeling Charges (Short Term OA)					
	33 KV (Rs/Unit)	0.12	0.17	0.23	0.27	0.3
	11 KV (Rs/Unit)	1.34	1.53	1.76	1.9	1.99
	LT KV (Rs/Unit)	1.75	2.05	2.42	2.66	2.84
4	Wheeling Losses(%)					
	33 KV	3.19%	3.18%	3.18%	3.17%	3.16%
	11 KV	3.30%	3.29%	3.29%	3.28%	3.27%
	LT KV	5.07%	5.06%	5.04%	5.03%	5.02%

ANDHRA PRADESH CENTRAL POWER DISTRIBUTION COMPANY OF AP LIMITED (APCPDCL)						
Sl.No.	Particulars	FY 2024-25	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29
A) ARR, Wheeling Charges & Wheeling Losses (%)						
2	Wheeling Charges (Long Term OA)					
	33 KV (Rs/kVA/Month)	83.02	98.96	130.68	172.08	199.53
	11 KV (Rs/kVA/Month)	688.51	762.41	920.11	1101.45	1230.81
	LT KV (Rs/kVA/Month)	846.4	950.87	1165.04	1426.3	1608.03
3	Wheeling Charges (Short Term OA)					
	33 KV (Rs/Unit)	0.12	0.14	0.18	0.24	0.28
	11 KV (Rs/Unit)	0.96	1.06	1.28	1.53	1.71
	LT KV (Rs/Unit)	1.18	1.32	1.62	1.98	2.23
4	Wheeling Losses(%)					
	33 KV	3.11%	3.10%	3.10%	3.09%	3.09%
	11 KV	3.16%	3.15%	3.15%	3.14%	3.13%
	LT KV	3.73%	3.72%	3.71%	3.70%	3.69%

EASTERN POWER DISTRIBUTION COMPANY OF AP LIMITED (APEPDCL)						
Sl.No.	Particulars	FY 2024-25	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29
A) ARR, Wheeling Charges & Wheeling Losses (%)						
2	Wheeling Charges (Long Term OA)					
	33 KV (Rs/kVA/Month)	64.26	88.99	151.2	203.54	222.33
	11 KV (Rs/kVA/Month)	671.48	792.75	1070.82	1267.28	1352.28
	LT KV (Rs/kVA/Month)	855.8	1007.51	1375.28	1618.62	1713.85
3	Wheeling Charges (Short Term OA)					
	33 KV (Rs/Unit)	0.09	0.12	0.21	0.28	0.31
	11 KV (Rs/Unit)	0.93	1.1	1.49	1.76	1.88
	LT KV (Rs/Unit)	1.19	1.4	1.91	2.25	2.38
4	Wheeling Losses(%)					
	33 KV	3.34%	3.33%	3.32%	3.31%	3.30%
	11 KV	3.39%	3.38%	3.37%	3.36%	3.35%
	LT KV	3.42%	3.41%	3.40%	3.40%	3.39%

We have noticed and observed that there is a tremendous increase in Wheeling Charges when compared with 4th Control Period : 2019 to 2024.

This increase in wheeling charges will have the major impact on the existing wind and solar plants and upcoming Renewable Power Projects in the state of Andhra Pradesh.

Wheeling charges are very high in Ap compared with other states and also the methodology for arriving these Wheeling charges is incorrect.

Hence we request you to revise the wheeling charges and wheeling losses to get it within the permissible limits which will help in viability of solar and wind projects in the state of Andhra Pradesh.

We expect that they would be in order, however, do kindly give us an opportunity to clarify if any of them need any clarification. We sincerely appeal to you to kindly incorporate the requested Inclusions and Amendments in them, to actively promote the distributed Renewable Energy Generation in our State of Andhra Pradesh.

Thanking You,

Yours Sincerely

For Bandaru Energies Private Limited

A handwritten signature in blue ink is written over a circular blue stamp. The stamp contains the text "BANDURU ENERGIES PRIVATE LIMITED" around the perimeter and "Hyderabad" in the center.

Authorized Signatory