

THE ANDHRA SUGARS LIMITED

Chemicals & Fertilisers Division : Kovvur - 534 350, Andhra Pradesh, India.



Ref. No.: CFK/2/2017 - 18/1026

Dt.: 19.12.2017.

THE SECRETARY,

A. P. Electricity Regulatory Commission,
Singareni Bhavan, 5th Floor,
Red Hills, Lakdi - Ka - Pool,
HYDERABAD - 500 063.

Mail ID.: commn-secy@aperc.gov.in

Sir,

Sub: M/s. Eastern Power Distribution Company of AP Ltd. - APEPDCL ARR Filings in the Matter of Approval for Retail Supply Tariff Filings for the Financial Year 2018 - 19 - Objections / Suggestions - Submitted - Reg.

- Ref: 1) ARR and Tariff Proposal Filings Dated 30th November, 2017.
2) Paper Notification Dated 08th December, 2017.

With reference to the above, we are herewith submitting our Objections / Suggestions in the matter of submission on Annual Revenue Requirement and Tariff Filings for the Financial Year 2018 - 19 by M/s. Eastern Power Distribution Company of AP Ltd., Visakhapatnam.

Name of Address of Objector / Suggestor	Details of Objections / Suggestions	APEPDCL Acknowledged Copy of Objections / Suggestions Enclosed YES / No	Interested to Participate in Public Hearing Proposed on 24 th June 2017
P. NARENDRANATH CHOWDARY MANAGING DIRECTOR THE ANDHRA SUGARS LIMITED, KOVVUR - 534 350, West Godavari Dist., AP.	Enclosed	YES	YES

So, we request you to take into record and pass order which deems to be fit.

Thanking you,

Yours faithfully,
For THE ANDHRA SUGARS LIMITED,

(P. NARENDRANATH CHOWDARY)
MANAGING DIRECTOR



THE CHIEF GENERAL MANAGER (Planning, PPA & RA)

M/s. Eastern Power Distribution Co. of A.P. Ltd,
Corporate Office, 3rd Floor, T.P.T. Colony,
Seetammadara, **VISAKHAPATNAM - 530 013.**



010368

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Email: info.tnk@theandhrasugars.com, asltkn@vsnl.com
Website: www.theandhrasugars.com, CIN: L15420AP1947PLC000326



**ANNUAL REVENUE REQUIREMENT FILINGS
OBJECTIONS / SUGGESTIONS ON BEHALF OF
M/s. THE ANDHRA SUGARS LIMITED**

We, M/s. The Andhra Sugars Ltd. are a HT – I Consumer of M/s. Eastern Power Distribution Company of AP Ltd. (APEPDCL) having our Industrial units at various locations Kovvur, Saggonda, Taduvai, Tanuku and Bhimadole. We are manufacturing Chloro Alkali Products, Fuel for Cryogenic Engines of Indian Space Research Organisation, Sugar and Allied Products. Out of these, Chloro Alkali Industries comes under Energy Intensive category of Industries as 70% of the product cost is towards Electricity consumption and power is one of the major raw material in producing Chloro Alkali products.

M/s. Andhra Pradesh Eastern Power Distribution Company have submitted their Annual Revenue Requirement filings to Hon'ble AP Electricity Regulatory Commission for their Retail supply business for the financial year 2018 – 19. We are herewith submitting our Objections / Suggestions on the above ARR filings here under.

- 1) **The Tariff filings are not as per the "Multi year and National Tariff Policy" :**
The present filings are not in accordance to "Multi Year Tariff Regulations" for the reason that the DISCOMS are filing their ARR filings annually.

So, we are strongly objecting this Annual filings.

- 2) **About Demand and Energy Charges :**
Even though, there is no increase proposed in the Demand and Energy Charges in the present filings, it is still on higher side due to lopsided policy of the Government to incentivise certain sections of society with free power policy & load the HT consumers who are bearing heavy financial burden leading to huge financial impact.

Hence, we are requesting a decrease the present Demand and Energy Charges for the survival of HT consumers particularly Chloro-Alkali Industry, who are power intensive category consumers.

- 3) **Levy of Cross Subsidy Surcharge and Additional Surcharge :**
There is no wisdom in imposing cross subsidy surcharge and additional surcharge that makes Open Access impossible, makes Open Access illusory, inflicts wholly unjustified and warranted costs in complying with RPPO obligations by obligated entities and the licensees obligation to supply (inflicts on it a loss).

We are therefore requesting Hon'ble Commission to review the present cross subsidy surcharge.

- 4) **Levy of TOD CC Charges :**
TOD Charges have been introduced in the Tariff year 2012 – 13, when there was Restrictions & Controls on usage of Electricity due to severe power shortage earlier, prevailed at that point of time to maintain the Grid discipline. But, it is being continued in consequent years even though there is no power shortage, and surplus power is available, which is unnecessary, unjustified, meaningless and also causes another additional burden on HT Consumers.

Therefore, we are strongly object levy of TOD CC charges for the consumption during 18.00 Hrs. to 22.00 Hrs. and requested Hon'ble commission to remove the TOD CC charges completely and supply power 24 Hrs. at normal tariff rate.

Suggestions :

- 1) Hon'ble commission may consider Chloro Alkali Industries may re-categorised in to HT - I (B) Energy Intensive Industrial category on par with Ferro Alloys Industries as 70% of the production cost is towards Electricity Consumption and power is also one of the raw materials.
- 2) Hon'ble commission may direct DISCOMS to introduce load factor based tariff incentive for Chloro Alkali Energy Intensive Industries as power will play major role in cost of production. Which also encourages utilisation of the DISCOM power by all HT Consumers.
- 3) Hon'ble Commission may introduce concession on the power utilisation during off peak period to encourage utilisation of the DISCOM power load factor by the HT Consumers.
- 4) Hon'ble Commission may please allow us to submit further submissions if any after receipt of response from the DISCOM.
- 5) Hon'ble Commission may please withdraw the concept of minimum billing on Contracted Maximum Demand as it leads to double billing when Open Access is availed as Transmission and wheeling charges are being paid, for the power purchased through open access in addition to the Demand charges which is already included i.e., the Transmission and wheeling costs for the Contracted Maximum Demand. It is unjust and arbitrary.

It is therefore necessary to provide that, when open access is availed, the Demand attributable to open access shall be withdrawn from the billing demand (whether it is 80% of CMD / Recorded Demand) and the Demand charges shall be applied only to the actual utilised demand from DISCOM.

- 6) It is submitted, Hon'ble commission may drop levy of penal Energy Charges for exceeding contracted maximum demand.
- 7) Hon'ble Commission may please be requested to issue directions to DISCOMS for issuance of Technical Feasibility (FORM - A) immediately on the request of consumers in order to obtain "No Objection Certificate" from Transmission Corporation of AP Ltd. to avail the facility to purchase Open Access Power from Indian Energy Exchange beyond the permitted quantum of power by SLDC. Since, DISCOMS are delaying issue of FORM-A and some times stalling the same resulting in HT consumers being forced to purchase the power from DISCOMS at a higher tariff impacting production cost. This is totally contrary to the Open Access Regulations and invariably cast substantial financial burden on our operations.

For THE ANDHRA SUGARS LIMITED,

(P. NARENDRANATH CHOWDARY)
MANAGING DIRECTOR

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THE ANDHRA SUGARS LIMITED

Chemicals & Fertilisers Division : Kovvur - 534 350, Andhra Pradesh, India.



Ref. No.: CFK/2/2018 09

Dt.: 05.01.2018.

THE CHAIRMAN & MANAGING DIRECTOR AND MEMBER CONVENOR,

State Co-ordination Forum,
M/s. Transmission Corporation of A.P. Ltd,
Vidyut Soudha,
VIJAYAWADA - 520 008,

Mail Id.: cmd@aptransco.gov.in

Sir,

Sub: M/s. The Andhra Sugars Limited – Section 166 (4) of the Electricity Act 2003 – State Co-ordination Forum – Joint Meeting of SAC (11th) and State Co-ordination Forum (6th) on 08th January, 2018 – Reg.

Ref: 1) Letter No.: CMD/AP Transco/ED/HRD & Plg./6th S.C.F./D. No. 125/17, Dt. 28.12.2017.
2) Our Letter No.: CFK/2/2017 – 18/D. No. 1028, Dt. 19.12.2017.

Please refer to your letter 1st cited, we would like to express our sincere thanks for being invited to attend the Joint Meeting of SAC (10th) and State Co-ordination Forum (5th) Meeting proposed to be held on 08th January, 2018 from 11:00 AM to 05:00 PM in the Conference Hall, 3rd Floor, SLDC Building, Vidyut Soudha, Vijayawada.

Now, we are herewith submitting our serious concerns on the agenda items which are applicable for our Energy Intensive Type HT I Category Chloro – Alkali continuous process consumers.

- 1) When compared the Demand Charges i.e. Fixed Cost with Other States Power Tariff, it seems to be on higher side and needs to be reviewed.
- 2) AP DISCOMS are not following the Multi Year and National Tariff policy while filing the ARR and retail supply tariff.
- 3) AP DISCOMS are levying Cross Subsidy Surcharge and Additional Surcharge which makes Open Access impossible, Illusory, Inflicts wholly unjustified and warranted costs in complying with RPPO obligations and needs to be reviewed.
- 4) To maintain the grid discipline during Severe Restrictions & Controls Imposed on usage of Electricity, TOD Charges have been imposed and are being continued subsequently even though there is no power shortage and even after our state became surplus power state.

So, it is requested to remove levy of present TOD Charges in the retail supply Business Tariff Order.

Contd. Page....2

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askvr@gmail.com

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Phone : +91-8819-224911 to 917, Mobile : +91-8186828888, 8186838888 Fax : +91-8819-224168
Email : info.tnk@theandhrasugars.com, asktnk@vsnl.com
Website : www.theandhrasugars.com, CIN : L15420AP1947PLC000326



-: Page.....2 :-

- 5) AP DISCOMS are charging @ Rs. 11.77 Ps. from November, 2017 onwards for the import power drawn from the grid for startup Wind Electric Generators which is very much on higher side. Earlier, they are charging Rs. 5.81 Ps. per each unit. Most of the months the wind mills are in motor mode due to lack of sufficient wind velocity.
- So, it is hereby requesting to reduce the tariff for the sake of wind power developers since it is a season based power generation.
- 6) It is hereby requested on behalf of wind power producers to exempt below 3.00 MW installed capacity wind developers from the establishment of mechanism for scheduling and forecasting, which will be a financial burden.
- 7) It is hereby requested to arrange alternative source of power supply to the consumers in event of break down in the existing source as per smart grid and Uday Schemes.
- 8) please find herewith enclosed the suggestions / objections submitted by us to The Andhra Pradesh Electricity Regulatory Commission with a copy to Chief General Manager (Planning, PPA & RA), APEPDCL on the recent filings on annual revenue requirement and retail supply tariff for the financial year 2018 – 19 by M/s. Eastern Power Distribution Company of Andhra Pradesh Limited.

So, we request you to consider the above points in the scheduled meeting and take necessary action for the benefit for large HT power consumers like us and renewable Energy Generators.

Thanking you,

Yours faithfully,
For THE ANDHRA SUGARS LIMITED,
Chemicals & Fertilisers Division,


ADMINISTRATIVE OFFICER

Encl.: As above.

- Copy to:**
- 1) SECRETARY, APERC, HYDERABAD.
Id.: commn-secy@aperc.gov.in
 - 2) EXECUTIVE DIRECTOR (HRD & PLG.), AP TRANSCO, VIJAYAWADA.
Id.: ed.plg@aptransco.co.in

TRANSMISSION CORPORATION OF ANDHRA PRADESH LIMITED

From
Chairman & Managing Director &
Member-Convenor, State Co-ordination Forum
APTRANSCO, Viduth Soudha,
Vijayawada - 520008

To
The President,
South India Sugar Mills Association,
C/o The Andhra Sugars Limited,
Ammatragapeta, Guntur - 524215

Lt. No. CMD/APTRANSCO/ED/HRD & Plg/6th S.C.F/D.No.125/17, Dt. 28.12.2017.

Sir,

Sub: Section 166 (4) of the Electricity Act, 2003 - State Co-ordination Forum - Convening of Joint meeting of SAC (11th) and State Co-ordination Forum (6th) on 08/01/2018 in the Conference Hall, 3rd Floor, S.I.D.C. Building, Viduth Soudha, Vijayawada from 11.00 AM to 5.00 PM - Invitation for the meeting - Reg.

Ref: 1. Lt.No.CMD/APTRANSCO/ED/HRD&Plg/5th S.C.F/D.No.53/17, Dt. 28/03/2017.
2. Lt.No.APERC/Secy/DD/CA/SAC/S-507/Vol.III, D.No. 17/19, Dt. 23.12.2017.

Please refer to the letter (1) cited, wherein the Joint meeting of SAC (11th) and State Co-ordination Forum (5th) meeting was held on 08/03/2017 in the TRANSCO Main meeting hall, Viduth Soudha, Hyderabad.

It is proposed to convene the joint meeting of SAC (11th) and State Co-ordination Forum (6th) on 08th January, 2018 from 11.00 AM to 5.00 PM in the Conference Hall, 3rd Floor, S.I.D.C. Building, Viduth Soudha, Guntur, Vijayawada. The agenda points as communicated by Chairman, APTR and Co-ordination Forum are furnished below for information:

AGENDA

- a. Presentation on RATE (Revenue and Tariff) Analysis for Electric Utilities model for AP by Sri N. Sree Kumar, Member, Prayas Energy Group.
 - b. Views of the Members on Annual Revenue Requirement and Impact of Proposed Tariff (PFI) for FY2018-19.
 - c. Reduction of Power Purchase Cost.
 - d. Implementation of 'DAY' Scheme by the Licensees.
 - e. Reduction in Demand Charges as in most of the States.
 - f. Matching agricultural consumption to solar production and avoiding need for back-up with providing farmers power during their farming.
 - g. Limiting purchases from Ward Power Projects to only 10% of the total consumption.
 - h. Under Category-II extending to panna hatcheries the same benefits that of poultry hatcheries.
 - i. Fixation of AP General variable cost rates based on previous quarter of loadings on the distribution with a cap.
- Remarks on Quarterly FC Account
- s. Other items suggested by members in their letter dated 05/12/2017, 15/12/2017 & 22/12/2017.
 - Any other points raised by members in the meeting.

Other Agenda items suggested by members

S. No.	Agenda Point	Suggested by
1.	Discussion on implementation of rules, regulations, orders, directives and Acts by Electricity Utilities of Andhra Pradesh.	
2.	The Electricity (Amendment) Bill 2014 i.e. Bill No.191 of 2014	
3.	Agricultural consumption - Agricultural Services	
4.	Maintenance of Rural Supply net work.	Sri K.
5.	Revision of Standards of performance	Ramesh
6.	Realistic ARR by the DISCOMs instead of envisaged ARR	Rudra
7.	Uniformity in presentation of ARR by the DISCOMs	President,
8.	Comparison of daily allowances of State Advisory Committee Members and CGRE Members.	Rashtriya
9.	Shifting of APERC to Amaniyathi	Raitha Seva
10.	Efforts of closure of Thermal Stations completed more than 25 years and future plans.	Samithi
11.	Financial Status of the Electricity Utilities of the State i.e. TRANSCO, GENCO & DISCOMs.	
12.	Tariff Related Issues	T.S. Appa
13.	Alternative strategies for peak load management	Rao - L.A.S.
14.	Reducing Financial Burden on the Consumers	(Retd.) Secretary General, ETAPCCI
15.	Stopping Power Purchases from Hinduja, Shridipati, Meenakshi, Krishnapatnam (APGENCO) Projects.	Sri K. Hari
16.	Termination of all earlier PPAs	Keshore
17.	Levy of Cross Subsidy penalty of Rs.2.50/- per unit in respect of Open Access Consumers	Kumar Raddy,
18.	Supplying free power for 10 hrs. to FTIIB Irrigation Schemes.	Bharateeya
19.	Under Category 5A and 5B, supplying free power 7 hrs. per day to all consumers except for corporate agriculture consumers	Kisan Sangh
20.	Releasing Agricultural Service to all pending applications	

I request you to kindly make it convenient to attend the above meeting

Yours faithfully,



Chairman & Managing Director

Member Convenor, State Co-ordination Forum

Page No.

Secretary, APERC, 303, J. S. A. B. C. Secy Bldg, 5th Floor, B. D. No. 1, 1st Floor, 25/12/17
RSVP

S. No. 1/2017

1st Floor, Bldg, 303, J. S. A. B. C. Secy Bldg

Tel: No. 0866-2424247, Mobile No. 9849111777

THE ANDHRA SUGARS LIMITED

Chemicals & Fertilisers Division : Kovvur - 534 350, Andhra Pradesh, India.



Ref. No.: CFK/2/2017 - 18/1025

Dt.: 19.12.2017.

THE SECRETARY,

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Name of Address of Objector/ Suggestor	Details of Objections/ Suggestions	APEPDCL Acknowledged Copy of Objections/ Suggestions Enclosed YES / No	Interested to Participate in Public Hearing Proposed
P. NARENDRANATH CHOWDARY MANAGING DIRECTOR THE ANDHRA SUGARS LIMITED, KOVVUR - 534 350, West Godavari Dist., AP.	Enclosed	YES	YES

So, we request you to take into record and pass order which deems to be fit.

Thanking you,

Yours faithfully,
For THE ANDHRA SUGARS LIMITED,

(P. NARENDRANATH CHOWDARY)
MANAGING DIRECTOR

THE CHIEF GENERAL MANAGER (Planning, PPA & RA)
M/s. Eastern Power Distribution Co. of A.P. Ltd,
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Seetammadara, VISAKHAPATNAM - 530 013.



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**ANNUAL REVENUE REQUIREMENT FILINGS
OBJECTIONS / SUGGESTIONS ON BEHALF OF
M/s. THE ANDHRA SUGARS LIMITED**

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For THE ANDHRA SUGARS LIMITED,

(P. NARENDRANATH CHOWDARY)
MANAGING DIRECTOR