

**BEFORE THE HONOURABLE ANDHRA PRADESH ELECTRICITY  
REGULATORY COMMISSION**

82-2-283/b/1, road No.3, Banjara Hills, Hyderabad

File No:  
Case No:

IN THE MATTER OF the Power Purchase Agreement between M/S Transmission Corporation of Andhra Pradesh Ltd (APTRANSCO) and M/S B.S.E.S. Andhra Power Ltd. For sale of power by the latter to the former from their 220 MW combined cycle power plant located at IDA Peddapuram, Samalkot, East Godavari Dt, A.P., submitted before the Honourable Commission vide Sec.21(4) of the APER Act, 1998 and public notice issued in Eenadu Newspaper dt 20<sup>th</sup> Oct., 2001, inviting suggestions and objections from the general public, the Rashtriya Raithu Seva Samithi, P.KothaKota, Via Pakala (post), Chittoor dt, AP 517 112, respectfully submits as under:

Requesting the Hon'ble A.P. Electricity Regulatory Commission to:

1. Direct M/S APTRANSCO and M/S BSES Andhra Power Ltd. to submit all the relevant information and respond to all the objections /suggestions mentioned in this petition before giving consent to their Power Purchase Agreement (PPA).
2. Allow the petitioner to be heard in person before the Hon'ble Commission takes any decision on this petition.

Name and Address of the Petitioner:

Rashtriya Raithu Seva Samithi,  
P.Kotha Kota (BPO), Via Pakala (PO),  
Chittoor District, A.P- 517 112

Represented By

G.Narendranath  
Member - Executive Committee  
Rashtriya Raithu Seva Samithi  
P.Kotha Kota (BPO), Via Pakala (PO),  
Chittoor District, AP - 517112

AND

Name and Address of Respondents:

Chairman and Managing Director,  
APTRANSCO, Vidyut Soudha,  
Hyderabad

AND

M/s. B. S. E. S. Andhra Power Limited  
Hyderabad

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In the matter of the Power Purchase Agreement (PPA) between M/S Transmission Corpn. of A.P. Ltd (APTRANSCO) and M/S B.S.E.S. Andhra Power Ltd. For sale of power by the latter to the former from their 220 MW Combined Cycle power plant located at IDA Peddapuram,Samalkot,East Godavari dt. A.P., submitted before the Hon'ble Commission vide Sec 21(4) of the APER Act,1998 and public notice issued in Eenadu newspaper dt.20 th Oct.2001 inviting suggestions and objections from the general public

We offer below our comments and suggestions/objections to the three agencies involved:

1.Hon'ble A.P.Electricity Regulatory Commission

2.M/S A.P.TRANSCO

3.M/S B.S.E.S. Andhra Power Ltd.

1. To the Hon'ble A.P Electricity.Regulatory Commission :

1.1 We wish to convey our deep appreciation to the Hon'ble Commission for the bold and independent stand it has taken vis a vis the PPA of APTRANSCO with M/S BPL Power Projects (AP) Ltd. And in striving to protect the interests of the consumers and the interests of the people of Andhra Pradesh. We sincerely hope that these traditions and high standards set up by Hon'ble Commission will continue to be upheld by future incumbents as well.

1.2 We are also thankful to the Hon'ble Commission for its positive response to some of our suggestions in the past to make the public hearings more participatory and meaningful such as holding the public meetings in spacious and centrally located halls, making the documents relevant for public hearings available at DISCOM head quarters etc.

In the interests of building up strong and active public participation in the above process we pray that the Honb'le Commission consider seriously the following suggestions:

1.2.1 Notice of public hearings should be given in at least three leading English and three leading Telugu dailies in all their editions across the state. Notice should also be given in at least two TV channels apart from Door Darshan and All India Radio about the public hearings. The venue, date and time of the actual public hearing should also be advertised in the above manner two days prior to the actual commencement of the hearings to enable members of the public to witness the proceedings.

1.2.2 A brief summary of the issues involved should be made available in TELUGU. The present practice of making the documents available only in English restricts public participation to a select few.

1.2.3 Cost of material supplied should be nominal. Photocopying costs on a large scale are done at 30 paise per page in the market at Hyderabad. The Hon'ble Commission should also charge accordingly for the material supplied by it.

1.2.4 The procedure requiring a demand draft to be submitted for the cost of materials supplied is arduous and time consuming. Members of the public should be allowed to pay in cash as well.

1.2.5 To make the proceedings of public hearings more meaningful the Hon'ble Commission has tried to circulate comments by the respondents to the objectors before the commencement of the hearings. Unfortunately these are being received rather late, sometimes AFTER the hearings have taken place. This is so especially in the case of petitioners residing outside Hyderabad. Even the invitation to participate in the public hearing is being received almost at the nick of the moment, making it very difficult for the petitioners to participate. In the case of the Rashtriya Raithu Seva Samithi in respect of the public hearing on 10-10-2001 regarding the PPA of APGENCO with APTRANSCO for the Rayalaseema power plant, stage II, we received the various correspondence as follows:

Materials Received	Date of Posting	Date of Receipt
1. From APERC invitation to participate in public hearing fixed for 10-10-2001 (Vide L r.No APERC/SECY/DD(Media) F:5/D.No4590/2001 dt 4-10-2001	5-10-2001	8-10-2001
2. Response to objections; Para wise remarks by APTRANSCO (Vide Ir.No CE/IPC/221/FRTTPP/ STAGE II/D.No244/2001 dt.6-10-2001)	8-10-2001	10-10-2001
3. Response to objections: parawise remarks by APGENCO (vide Ir.No.CPP/411/RTTPP-II/ ERC/734/2001 dt 5-10-2001)	10-10-2001	12-10-2001

1.2.6 In order to accommodate the above processes and make the whole exercise more effective and meaningful it is suggested that the public hearings should be conducted within a reasonable span of time: 30 to 45 days should be given for submission of objections from date of announcement of public hearing. A further 21 days should be allowed for the respondents to file their replies and circulate them to the petitioners well in time before the actual hearings take place. Necessary amendments should be made in the APER Act 1998 Sec19 (3).

1.2.7 If the public hearings are going to be conducted only in Hyderabad petitioners residing outside Hyderabad should be paid at least second-class railway fare or bus fare. This would encourage greater number of participants.

1.2.8 The above suggestions imply a pro-active role for the Hon'ble Commission, which we feel is very much essential in the present situation. Where expenditures to the tune of thousands of crores rivalling the state budget are being committed on behalf of the people

with little awareness among the general public of the criticality of the issues involved and their impact on daily lives.

1.2.9 Transparency and Accountability of institutions (public or private) and active public participation in auditing their functioning are the pillars of a strong, healthy and living democracy, which is in the interests of all. We request the Hon'ble Commission to consider the above suggestions seriously. In the case of the present PPA it was shocking to note that M/S BSES Andhra Power Ltd have submitted their PPA with M/S APTRANSCO to the Hon'ble Commission without enclosing the tariff projections, the necessary and relevant financial statements and important documents like the fuel purchase agreement. In the absence of these documents no meaningful discussion can take place. We have already conveyed the same by telegram to the Hon'ble Commission on 13<sup>th</sup> Nov.2001. We request the Hon'ble Commission to order M/S BSES to submit all the above data and other relevant information relating to the above PPA at the earliest. The public hearing, we feel, should be postponed to a suitable time to enable the data to be circulated to all the objectors/petitioners.

## 2. Questions to APTRANSCO :

2.1 Need for realistic demand projections: We have been consistently questioning the reliability of the projections being made by APTRANSCO regarding the demand for power (in all our earlier petitions). The projections of APTRANSCO as submitted to the House Committee of the A.P.Legislative Assembly and the actual demand are as under:

Description	2000-01	2001-02	2002-03	2003-04	2004-05
Projected additional Demand (MW)	1346	2138	2993	3539	4479
Projected energy Requirement(MU)	42628	47148	51333	54807	59470
Actual Demand (MU)	41839	41800			
Projected Capacity Addition-cumulative (MW)	505	1525	3092	5213	5653

Given the almost stagnant demand for power from 2000-01 to 2001-02, the recession in the economy, not only at the state level but also at the national and global levels, it is necessary to constantly review and rework our energy needs. As recommended by the Godbole Committee, in its review of the PPA with the Dhabol Power Corpn of M/S Enron with the MSEB, there is a definite need to assess the base load, intermediary and peak load demands on the system on a daily, seasonal and annual basis. Based on realistic projections the capacity additions, especially from the private sector, should be planned according to need to supply power to meet either base load or intermediary or peak load demand and PPAs signed accordingly.

2.2 In its response (to our objections in the case of the PPA with M/S BPL) APTRANSCO has stated that the projections are based on surveys conducted by the Central Electric Authority and the estimates of the Hithen Bhaiya Committee. It was further stated that M/S SNC Lavallin ,Canada were appointed as consultants by APSEB “to critically review the load forecast. Generation plan up to the year 2008 is under finalisation and this load forecast by the consultants is conservative and realistic based on the present situation of load growth anticipated and projected by the DISCOMS.”(Para wise remarks reply to petition on Transco’s PPA with M/S BPL.

It is not known whether the report of the consultants has been submitted. If so, the concerned public would like to know what these projections are. It is requested that the Honourable Commission direct APTRANSCO to reveal the findings/projections of the consultants M/S SNC Lavallin.

2.3 It is crucial to have a picture of the base load, peak and intermediary demands in order to decide the necessity of a PPA with a power generator like M/SBSES Andhra Power whose unit at Samalkota is to be a gas based one. The advantage of a gas based unit lies in that it can be more easily monitored to step up or step down generation unlike a coal based thermal plant and hence is more suitable for operation as a peak load plant. As per Art3. of the PPA “APTRANSCO shall pay for the capacity of the project in respect of any tariff year a capacity charge calculated in the manner described in Art.3.2 in respect of the cumulative available energy which is equivalent to a PLF of 85% (Art3.1)”. It is clear from the above that the project is being considered as a base load plant while the technical advantage is in favour of operating it as a peak load plant. The ultimate decision will have to be taken keeping in view the actual shortage in base load demand and the tariff being proposed by the generator.

2.4 A note of caution needs to be sounded against the smug assertions of APTRANSCO of a definite rise in demand at the expected rate for the following reasons: as a result of the reform processes under way: a) The move to do away with cross subsidies altogether and make the service “cost to serve” within the next seven years (to recover 50% of the costs within the next three years – as re-emphasized in the Conference of Chief Ministers on the power situation presided over by the Prime minister on 3-3-2001 at New Delhi) will result in steep hikes in tariffs to domestic and more especially agricultural consumers across the country by 200 to 1000% within the next few years. A sudden and steep increase in tariffs will naturally lead to consumer resistance. Further, taking the paying capacity of the weaker sections into consideration it is most likely that they will either cut down their consumption or take recourse to pilferage of power.

b) The introduction of Electricity bill-2001 envisages a free license, for any body to produce/generate power and sell freely to any consumer, with the role of TRANSCO being reduced to that of a mere wheeler of power. As a wheeler there is a limit to what the TRANSCO can charge despite the provision for surcharge to compensate Transco for the cross- subsidization it has to undertake. It is clearly stated in the Bill that the cross - subsidization will have to be progressively eliminated and also that “surcharge shall not be leviable in case open access is provided to a person who has established a captive generating plant for carrying the electricity to the destination of his own use”(Sec38(2)d(ii)) .TRANSCO’s tariff rates for the elite consumers in the HT and commercial categories has almost reached a saturation point as evidenced by their increasingly turning to captive generation. While captive generation is steadily increasing, the demand for Transco’s power

from HT and commercial consumers is almost stagnant. If private producers are allowed to freely generate and sell power without being burdened by cross-subsidization and T and D losses, like Transco, then who will TRANSCO sell its power to? How will TRANSCO be able to sustain itself commercially especially when it is tied down by PPAs with various private producers to purchase all the power produced at high rates of tariffs? TRANSCO should ponder over these basic and critical questions which not only have a direct bearing on the demand for power supplied by TRANSCO but also on the very SURVIVAL of TRANSCO. It is therefore prayed that the Hon'ble Commission call upon APTRANSCO to present a realistic analysis of the base load and peak and intermediate load demands category wise, on a daily, seasonal and annual basis and also show how the generation from various power producers are likely to be tied up with these varying demands.

2.5 Incentive for generation beyond a PLF of 85% for a tariff year at 2% of other fixed charges for every percent increase in PLF. In the absence of ANY FIGURES AS TO WHAT THE OTHER FIXED CHARGES ARE, it is not possible to figure out what the implications are. It is however, somewhat intriguing that APTRANSCO allows itself different formulae for calculating the incentive for improved generation with different producers. As shown below:

S.No	Company	PLF slab beyond which incentive is to be given	Formula for incentive
1.	M/S BPL power projects	<80%	for every additional 1% increase in PLF 0.525% of equity (136 paise Per kwh)
2.	M/S APGENCO –RTPP Stage-II	<77%	21paise per KWH or 50% of annual fixed charges per unit for that year which ever is less (21 paise per KWH)
3.	M/SGVK Industries	<68.49%	0.525% on Equity
4.	M/S Spectrum Power Generation Limited	<68.5%	not known

It is requested that the Hon'ble Commission direct APTRANSCO to explain the variations.

2.6 Period of Agreement: The PPA, vide Art6, states that it is to be for a period of 15 years only. While the PPAs with other generators have been for a period of thirty years. In this connection it would be worthwhile to recall the comments of the Comptroller and Auditor General in their evaluation of the PPA of M/S GVK industries with APSEB in the financial year 1998: " Though the life of the gas turbines was shown as 15 years in Electricity (Supply) Act, their fair estimated value life is around 20 years and of the auxiliaries and steam turbine is around 30 years. By carrying out renovation and modernization of gas turbines, the capacity can be restored to normative level at a lower cost.

(ii) As per the terms of the restated PPA on renewal for further period, the fixed charges would be recalculated based on capital cost that would be the sum of (a) terminal valuation of the plant which should be treated as equity and the expenditure incurred on renovation

and (b) expenditure on modernization which would be treated as debt or equity depending on the actual source of funding. The terminal valuation should mean an amount equal to 50% of the depreciation/replacement cost of plant, machinery and equipment assuming the operating life of the project at 30 years from the COD of combined cycle plant. Thus the Board would have to pay a return of 16 percent or 50 percent of depreciated / net replacement cost of plant treated as equity besides depreciation at 7.84 percent on such capitalized value of replacement cost. This additional financial burden could have been avoided had the agreement period been retained at 30 years as originally agreed upon.”

It is clear from Art.6 of the PPA that after the expiry of the duration period of the agreement of 15 years “The Board shall have the first option to purchase the project at the **terminal value** plus any transfer costs and transfer taxes (as defined in schedule G) and as determined by the Independent Appraiser defined in Schedule C (Art6.2 of PPA) The conditions laid down in schedule G of the PPA with M/SBSES Andhra Power Ltd. are no different from those mentioned by CAG in the PPA with M/SGVK industries above. It is therefore prayed that under the condition of M/SBSES supplying power to APTRANSCO at a reasonable tariff comparable to rates at which APGENCO would be supplying from its new units, the Hon’ble Commission may direct that the tenure of the present PPA under consideration be extended to 30 years instead of the proposed 15 years.

2.7 Independent Appraisers mentioned in the PPA (Schedule C) are 5 multinational Corporations: M/S Arthur Andersen & Co, Coopers & Lybrand, Ernst & Young, KPMG Peat Marwick, Price Water House LLP The petitioner would like to know:

a) Whether these names have been arrived at after mutual consultation between the two signatories of the PPA,

b) Was it not possible for M/SAPTRANSCO to include in the list some reputed Indian companies in the sector like M/S CRISIL or ICRA etc. or of any other third world country?

2.8 What are the merits of having a combined cycle plant? How has this been reflected in the over all cost of the project and the tariff to Transco?

3. Questions to M/SBSES Andhra Power Ltd.

3.1 It is rather surprising that the company has deemed it fit not to reveal the financial details of the project while submitting the PPA to the hon’ble Commission for perusal and Public hearing and giving its approval. In the absence of the tariff projections, financial statements and fuel supply agreements it is difficult to ask any questions regarding critical issues. Involved such as :

3.2 What is the extent of the foreign component, loan component in the capital cost of the project?

3.3 What is the impact on tariff of the loan amount and the foreign component?

3.4 What is the expected tariff at which the company proposes to sell power to APTRANSCO and the expected rates on a time scale of 15 to 30 years. How does it compare with the rates offered by other companies similarly placed?

3.5 What is the return on equity? How do the O&M expenses, insurance, interest rates, break-even ,station heat rate, calorific value etc compare with those of other plants similarly placed?

3.6 What conditions have been laid in the fuel supply agreement What if the supplier fails to supply the required quantity? And what if the company fails to utilize the gas contracted for/supplied? Are the rates agreed upon comparable internationally?

3.7 What safety measures have been contemplated by the company to prevent gas leakages and such other accidents?

3.8 What is the likely environmental impact of the unit? How many families have been displaced by the project –directly and indirectly? Have they been resettled suitably? Have any of them been provided employment in the project? If so in what positions?

How are the flora and fauna of the area affected? Or likely to be affected? What could be the likely impact of the heat and waste gases emitted by the project on the crops and aquaculture of the area? Have such costs been taken into account in the costing of the project? Has the M ministry of Environment cleared this project? Have they asked these questions and if so have they imposed any conditions for clearance/ have such costs of compensating environmental damage and rehabilitation of project affected people been included in the cost of the project? Are these costs being passed on to the consumers through the tariff?

It is prayed that the Hon'ble Commission order M/s. BSES Andhra Power Ltd. To submit the above details and the same may be circulated to the petitioners at the earliest for a meaningful hearing to take place.



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In the matter of the proposed wheeling charges by M/S APTRANSCO and M/S APCPDCL, APNPDCL, APEPDCL and APSPDCL for the financial year 2001-02 submitted before the Hon'ble Commission vide Sec26 of the A.P.Electricity Reform Act,1998 and Public Notice issued in Eenadu newspaper dt. 25<sup>th</sup> October,2001, inviting suggestions and objections from the general public., we offer below our comments/objections to the agencies involved:

1.Undue delay in submission of proposal: Hardly four months are left for the completion of the financial year 2001-02. There is little meaning in submitting a proposal for wheeling charges at the fag end of the year. APTRANSCO and the Four DISCOMS concerned should explain the reasons for this undue delay which only reflects the "old culture" of disinterestedness in general.

2.APTRANSCO has been charging wheeling charges in kind ranging from "2 percent for the non-conventional energy generator to 25 per cent in the case of APGPCL". This has to be seen in the light of the poor transmission and distribution performance of APTRANSCO with T and D losses (technical and non-technical) of the order of 30 to 40% of the total generation (if not more ).It must be remembered that according to its own admission APTRANSCO is able to bill and recover payment for hardly about 40% of the power purchased by it. While agriculture consumption is anywhere between 15 to 22 percent of the total power supplied the rest "disappears". In this context taking on the task of wheeling for generators and consumers outside the network of APTRANSCO, thanks to its monopoly over the transmission and distribution network, will only result in heavy losses for APTRANSCO—as it has to compensate the generators for the heavy T and D losses in transit which are apparently much larger than the 25% of power charged to the highest payer for wheeling charges viz.APGPCL.

The choices before APTRANSCO are therefore :

- a) Not to take on wheeling exercises for others till such time as it is able to bring down its T&D losses to a reasonable level of say below 10% of power purchased.
- b) To charge the customers fully for the T and D losses of AP Transco.

The choice before the private producers and consumers outside the APTRANSCO network is therefore either to produce power for captive consumption locally without having to use the transmission lines of APTRANSCO or to pay for the inefficient T & D system of APTRANSCO using its T & D network. (The choice of developing alternate network of T & D with existing technology is too prohibitive beyond a short distance to be considered seriously). If the wheeling charges proposed by APTRANSCO are nominal or such that the final price of power supplied by them to the consumer is cheaper than that supplied by

APTRANSCO, then the private generators of power and consumers of power will still stand to gain and would like to use the facilities of APTRANSCO. But this is suicidal for APTRANSCO. It will only help wean away some more of the already limited (and shrinking) elite consumer market of APTRANSCO consisting of HT consumers and Commercial establishments (who are indeed the target of the private generators).

### 3. Impact of the new Electricity Bill-2001:

The problem also needs to be seen in the light of the new Electricity Bill –2001 which seeks to permit anyone to produce electric power freely and supply the same to any consumer with TRANSCO reduced to the role of a wheeler. Sec.38(1) &(2),Sec39 (1)&(2),Sec42(1,2,3) & Sec61 of the proposed Electricity Bill,2001 (Annexure 3 of submission by APTRANSCO) makes it amply clear that:

A) Transco can charge an additional amount as surcharge commensurate with the cross-subsidy (Ar 38 (2dii) and 39 (2dii),

B) That the subsidy and consequently the surcharge must be “progressively reduced” and also that “such surcharge may be levied till such time the cross subsidies are not eliminated.”

C) It also clarifies that “such surcharge shall not be leviable in case open access is provided to a person who has established a captive generating plant for carrying the electricity to the destination of his own use” In other words, the direction and scope of wheeling charges is rather limited by the bill which is likely to become an Act very soon. So that any reforms in the wheeling charges have to take these limitations into consideration.

TRANSCO would be well within the limits of the provisions of the proposed bill to levy a surcharge on the wheeling charges to protect its cross-subsidization of weaker consumers as well as its own commercial survival. The proposed wheeling charges by APTRANSCO should be such that, together with the surcharge will ensure that tariff of the private generator to the consumer concerned is not less than that charged by APTRANSCO. This should be the cardinal principle guiding APTRANSCO’s tariff philosophy as far as wheeling charges are concerned. Seen in this light the wheeling charges being proposed by APTRANSCO, given its monopoly status, are TOO SMALL and will only help decrease its already stagnant market of elite consumers (of HT and Commercial establishments). The wheeling charges will therefore have to vary depending upon the category of consumer, the distance over which the power is proposed to be transmitted, the 133 KVs and 33 KV and 11KVs involved (reflecting the extent of T&D losses likely to be incurred). A uniform wheeling charge, under the present dire circumstances for TRANSCO is neither desirable nor advisable.

4. The wheeling charges at a uniform rate of one rupee per unit will not be sufficient to cover the real losses of APTRANSCO which have been assumed to be 19.5% in all (8.5% up to 33KV breaker and 11% in 33KV and 11 KV network) but in reality are much higher - between 30 and 40%. (as much of the theft is passed on as agricultural consumption, which is not metered-, as evident from various calculations of actual agricultural consumption.). Besides, the Reasonable Rate of Return calculated for the DISCOMS works out to only 2.8% (34.4 of 1227 crores) where as for APTRANSCO it works out to 35.4% (167 of 472 crores). The rationale for this wide variation in “Reasonable Rate of Return” needs to be explained.

5. Given the above conditions it is essential that APTRANSCO does its homework and present before the Hon'ble Commission a proposed stratified wheeling charge and corresponding surcharge for different private generators who wish to utilize the wheeling facilities of APTRANSCO such that the ultimate tariff charged by the private generators to their consumers are no less than that charged by APTRANSCO to similar consumers.

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Requesting the Hon'ble A.P.Electricity Regulatory Commission to:

1. Direct M/S Transmission Corporation of A. P. Ltd and M/S A.P.C.P.D.C.L.,A.P.N.P.D.C.L., A.P.E.P.D.C.L.,and A.P.S.P.D.C.L. to submit before the Hon'ble Commission a revised stratified wheeling charge along with suitable surcharge to ensure that the ultimate tariff charged by the private generator to his consumer is no less than that offered by APTRANSCO.
2. Allow the petitioner to be heard in person before the Hon'ble Commission takes any decision on this petition.

Name and Address of the Petitioner:

Rashtriya Raithu Seva Samithi,  
P.Kothakota (BPO),Via Pakala,  
Chittoor District, A.P.517 112

Represented by

G. Narendranath,  
Member, Executive Committee,  
Rashtriya Raithu Seva Samithi,  
P.KothaKota (BPO),Via Pakala (PO),  
Chittoor dt.,AP. 517112

AND

Name and Address of the Respondents:

Chairman & Managing Director,  
Transmission Corporation of A.P.Ltd.  
Vidyut Soudha,  
Hyderabad 500 082

AND the Chairman and Managing Directors of  
M/S APCPDCL,M/S APNPDCL,M/SAPEPDCL,M/SAPSPDCL  
C/O A.P.TRANSCO,  
Vidyut Soudha,Khairatabad,Hyderabad500 082

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Affidavit verifying the memorandum of objections

I, Gorrepati Narendranath S/OG.Ramachandra Naidu,working for the welfare of farmers and other rural communities through the Rashtriya Raithu Seva Samithi without any monetary gains at P.Kothakota, Via Pakala (BPO),Chittoor dt.,A.P.517112, do hereby solemnly affirm and state as under:

1. I am a member of the Executive Committee of the Rashtriya Raithu Seva Samithi, the applicant in the above matter and am duly authorized by the said applicant to make this memorandum of objections on its behalf.

2. The statements made in the paragraphs of the accompanying memorandum of objections now shown to me are true to my knowledge, derived from the petition on proposed wheeling charges by M/S APTRANSCO and M/SAPCPDCL, APNPDCL, APEPDCL, and APSPDCL and other documents supplied earlier by the Hon'ble Commission, materials published and available to the public gathered by the Rashtriya Raithu Seva Samithi and made available to me and are based on information and advice received which I believe to be true and correct.

Solemnly affirm.

Deponent

19<sup>th</sup> Nov.,2001  
Hyderabad

Attested by

Witness

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**AFFIDAVIT VERIFYING THE MEMORANDUM OF OBJECTIONS**

I, Gorrepati Narendranath S/O G.RamachandraNaidu working for the welfare of farmers and other rural communities through the Rashtriya Raithu Seva Samithi without any monetary gains at P.KothaKota,Via Pakala (PO),Chittoor dt.,A.P.517112, do hereby solemnly affirm and state as under:

1. I am a member of the Executive Committee of the Rashtriya Raithu Seva Samithi, the applicant in the above matter and am duly authorized by the said applicant to make this memorandum of objections on its behalf.
2. The statements made in the paragraphs of the accompanying memorandum of objections now shown to me are true to my knowledge, derived from the PPA entered into by M/S BSES Andhra Power Ltd. With M/S Transmission Corporation of A.P.Ltd. and other documents supplied earlier by the Hon'ble Commission, materials published and available to the public gathered by the Rashtriya Raithu Seva Samithi and made available to me and are based on information and advice received which I believe to be true and correct.

Solemnly Affirm.

Deponent

19<sup>th</sup> Nov.,2001  
Hyderabad

Attested by

Witness