BEFORE THE HONORABLE ANDHRA PRADESH ELECTRICITY REGULATORY COMMISSON

11-4-660, 5TH Floor, Singareni Bhavan, Red Hills, Hyderabad-500004

1.1 The following submissions on ARR and tariff proposals for the year 2011-12 are in response to the Public Notice published in newspapers on 13th January 2011.

2.1 According to the ARR and Tariff Proposals for the year 2011-12 total deficit of all the four DISCOMs stands at Rs. 5,951.85 crore. The Licensees did not explain how they intend to fill this deficit. The proposed new tariff proposals also will not generate additional funds enough to fill the deficit.

2.2 According to the present submissions net deficit (after taking in to account the subsidy provided by the Government of AP) of CPDCL for the year 2009-10 is Rs. 1,901.08 crore and for the year 2010-11 it is Rs. 1,460.38 crore. During the year 2010-11 additional power purchase cost is about Rs. 1, 035 crore. This may be recovered through FSA. Still there will be a deficit of about Rs. 425 crore. CPDCL no where explained how it intends to recover this deficit. Other DISCOMs did not provide information on deficits for the first and second year of the present control period.

2.3 Hitherto experience shows that the Commission is adopting a conservative estimate of power consumption in the state for each year as a part of its Tariff Orders. And every year actual consumption is overshooting the Commission's estimate. As a part of its estimates the Commission is over ruling the power purchase from the market. But the DISCOMs end up purchasing power from open market at higher prices. If they are allowed open market purchases in advance they could have tied for power at lower prices. For the financial year 2010-11 the DISCOMs proposed open market purchases of 3,446 MU but the Commission in its Tariff Order allowed only 860.33 MU. Despite this the DISCOMs ended up procuring 3,930 MU from the open market. Though the average cost of this power (Rs. 4.62/unit) is less than the price stipulated by the Commission (Rs. 5.50/unit, para.291) the cost could have been lower if they had made advance preparations. It has become normal practice for DISCOMs to scout for additional power in the open market the very next day the Commission issues the Tariff Order disallowing or reducing open market purchases.

2.4 Here it is also to be kept in mind that after many years power holiday was declared for industries in the state. Other categories of consumers also were subjected to prolonged power cuts. The Commission allowed procurement of 77,828.60 MU by the DISCOMs in the state during the year 2010-11. The DISCOMs during this procured 78,351.15 MU. If we take in to account the power holidays for the industries and power cuts imposed on other consumers in the state power requirement was much higher.

2.5 Another disturbing trend observed during the earlier year was whenever DISCOMs planned to procure power additionally, over and above the quantum and sources allowed by the Commission they did not approach the Commission for approval to procure additional power. But they approached the state government for permission to procure additional power. News reports dated 22-11-2010 in the Hindu and dated 23-11-2010 in Andhra Jyothi mentioned that the DISCOMs approached the state government for approval to procure 1800 MW of power from the open market. But similar request was not moved before the APERC. Under the AP Power Sector Reforms Act 1998 and Electricity Act 2003 the state government does not have any power to decide on these matters and it is for the Commission to decide. This practice shows that the Licensees are not following the regulations in procuring power. To this extent it is a violation of both the Acts mentioned above.

Table 1: Difference in Estimate and Procurement for the year 2010-11 (MU)

Source	APERC Estimate	Actual Procurement by DISCOMs	Difference
CGS	14,065.89	12,689.50	1,376.39
IPPs	19,295.67	17,151.07	2,144.60
Total			3,520.99

2.6 In its Tariff Order for the year 2010-11 the Commission estimated that 14,065.89 MU would be available from CGS but the DISCOMs could procure only 12,689.50 MU. Similarly in the case of IPPs while the Commission estimated that 19,295.67 MU would be available the DISCOMs could procure only 17,151.07 MU. The total difference is 3,520.99 MU. If this power were procured successfully dependence on open market purchases could have come down drastically and deficit in ARR could have been bridged to a large extent. We request the DISCOMs to explain why they failed in procuring this power from these two sources.

POWER PURCHASE COST

Table 2: Power Purchases & Costs – Source wise

STATION	Power Purchase (MU)	Fixed cost (Rs. Cr)	Variable Cost (Rs. Cr)	Total Costs (Rs. Cr)

GENCO – T	33,008.51	3,630.33	4,784.78	8,483.76
GENCO – H	7,662.75	1,007.80		1,044.63
GENCO	(46.54)40,671.26	4,638.13	4,784.78	(43.06)9,528.39
CGS	(14.93)13,048.78	633.07	1,666.00	(10.46)2,314.26
Simhadri	(10.75)9,393.70	824.87	1,481.00	(10.46)2,316.72
IPPs	(19.79)17,291.73	1,609.41	3,127.25	(21.41)4,737.32
APGPCL	(0.32)278.70	24.11	49.44	(0.33)73.56
Others	(3.73)3,263.14	46.95	1,220.40	(5.74)1,270.35
External Purchases	(3.92)3,433.68		1,888.53	(8.53)1,888.53
Total	87,380.99	7,776.54	14,217.41	22,129.12

3.1 Power purchase costs account for 80 percent of the revenue required for the year 2011-12. The filings of the DISCOMs show discrepancy in the power purchase costs. There is difference in power purchase cost projection. At page No. 32 of CPDCL the projected cost of power purchase for the whole state is Rs. 22,129.12 crore (This figure appears in the filings of other DISCOMs also). But the total of power purchase costs mentioned in ARR of respective DISCOMs amounts to Rs. 22, 772.29 crore. Difference is Rs. 643.17 crore. The filings do not throw light on what accounts for this difference. We request the DISCOMs to explain the difference between the two figures.

Fuel cost burden:

3.2.1 Current year's filings show that fuel costs/variable charges account for more than 64 percent of the total power purchase costs. The following tables also show the increasing fuel cost burden. While GENCO, CGS and Simhadri plants are coal based IPPs units are gas based. All the plants are experiencing increased fuel bills.

Table 3: Variable Cost Rs/U

Station	**2008-09**	**2011-12**
GENCO	1.44	1.45
CGS	1.15	1.40

Simhadri	1.11	1.58
IPPs	1.10	1.81

3.2.2 Over the last few years coal mining companies are hiking the prices frequently. The central government, which fully or partly controls/owns these companies, is encouraging them to hike coal prices in the name of commercial operation. While these companies are happy with increased profits with same efficiency, consumers ultimately need to bear this burden. According to DISCOMs' filing "due to increase in coal price and use of imported coal the weighted average power purchase cost in FY 2010-11 is Rs. 2.43/kWh (excluding short term expensive power purchase) as against the Tariff Order approved value of Rs. 2.24/kWh" (APCPDCL Tariff Proposal 2011-12, p.vi). While not denying the need for healthy finances of the coal companies burdening the common man should not be the only way to keep these companies healthy.

3.2.3 Besides this the central government is forcing the thermal power plants to procure coal from foreign countries. The cost of imported coal is nearly twice that of the locally available coal. This also contributed to the increase in variable costs of the thermal power plants.

3.3 Increase in gas price has adversely impacted the consumers. The price of gas from KG basin fields of RIL is increased from $ 2.52 to $ 4.2 per MBTU in a questionable manner. The new price is said to have been arrived at through so-called price discovery mechanism. This mechanism was carried out by RIL but not by the Government of India. The Prime Minister's Advisory Council also found fault with the mechanism adopted in this price discovery. But still the GoI went ahead and gave clearance to this hike. Even more astonishingly the government of India increased the price of gas from ONGC from $ 1.79 to $ 4.2 per MBTU. This hike is effected in the name of minimizing the losses of public sector gas companies. Irony is that these companies are some of the highly profit making companies in the country even before this hike. One could only imagine the windfall profits these companies are going to make. But electricity consumers have to bear this burden. Instead of facilitating availability of cheap and affordable electricity to the consumers these steps of the government are making electricity very costly. The impact of this hike can be discerned from this year's ARR filings. For example while variable cost of GVK's first unit, which gets gas from ONGC, in the year 2009-10 (first year of the present Multi Year Tariff period when old gas prices prevailed) was Rs. 1.46 per unit, for the ensuing year 2011-12 the variable cost per unit is Rs. 1.67. The variable cost of GVK's extension unit for the ensuing year is Rs. 1.79 per unit.

3.4 In all this the DISCOMs have remained silent spectators. They did not voice any protest against these uncalled for hikes in fuel prices. We request the Commission to direct the Licensees to ask the power developers to renegotiate the fuel supply agreements and see that these fuel prices are rolled back.

APGPCL

3.5.1 According to the ARR and tariff proposal submissions for the year 2010-11 the APGPCL was supposed to supply 452 MU. But the ARR and tariff proposal submissions for the year 2011-12 shows that during the year 2010-11 APGPCL was able to supply only 357 MU and during the ensuing year it will be supplying even lower quantum of power i.e., 278.70 MU. Decreased availability from this plant during the FY 12 is attributed to 'expected shortage of availability of gas' (APCPDCL ARR and Tariff Proposal 2011-12, p.33). But how come there is no reduction in power availability from IPP's plants which are also gas based! It has to be understood that the decreased availability of gas to APGPCL plant is not because of 'decreased availability of gas' but due to deliberate action of the state and central governments. APGPCL is in operation for more than one decade. The ostensible reason for curtailing gas supply to this plant is that it is a captive plant. When the same status did not come in the way of gas allocation for more than a decade how is it that it has become an issue now? When unknown and unheard of entities like Panduranga Energy Systems were allocated gas why is a plant that is serving the state for more than a decade was denied gas allocation? Every effort shall be made to see that the gas allocation to APGPCL is restored.

3.5.2 According to the ARR and tariff proposal submissions for the year 2010-11 the APGPCL's fixed cost for that year was Rs. 3.52 crore. This has increased to Rs. 8.18 crore according to the filings for the year 2011-12. This fixed cost for the year 2011-12 according to the ARR and tariff proposals for the year 2011-12 stands at Rs. 24.11 crore. According to these filings, "For FY 12, it is proposed to take up the Stage I and Stage II for HGPI and Major inspection with a cost of Rs. 4218 lakhs and Rs. 4716 lakhs respectively". (APCPDCL, p.24). But this raises other issues.

3.5.3 There was no explanation for the hike in fixed costs during the year 2010-11.

Table 4: Fixed Costs of APGPCL

APGPCL	Capacity MW	DISCOM Share in capacity %	HGPI + Inspection Cost Rs in Cr	DISCOM share according to their share in capacity	DISCOM share according to the ARR filings Rs	Difference Rs in Cr

				Rs in Cr	**in Cr**	
Stage I	100	16.00	42.18	06.75	07.41	0.66
Stage II	172	24.88	47.16	11.73	16.71	4.98
Total	272	21.62	89.34	18.48	24.12	5.64

3.5.4 While there is big difference in the capacities of the two units there is not much or proportional difference in HGPI and inspection costs incurred.

3.5.5 According to the DISCOMs' share in the plant capacity their share in HGPI and inspection costs should have been Rs. 18.48 crore. But the DISCOM filings show that DISCOMs have to bear a cost of Rs. 24.12 crore. The difference is Rs. 5.64 crore. Whether repair and maintenance alone accounts for this difference.

3.5.6 As HGPI and inspection costs are treated as fixed costs, is it necessary to recover them in a single year?

APGENCO Related Issues

3.6.1 Even after a decade of reforms and regulatory process in the state's power sector there is no proper and long term PPA with APGENCO for power procurement from the existing units. In the Tariff Order for the year 2010-011 the Commission has stated that pending determination of generation tariff for APGENCO's power stations for FY 2010-11, the fixed cost is determined based on information provided by APGENCO in its application for determination of generation tariff in accordance with Regulation 1 of 2008 (para. 282). We request the Commission to take up these PPAs in a transparent and expeditious manner.

3.6.2 DISCOMs' ARR filings for the year 2011-12 show that power is going to be procured from 5 new units of APGENCO. These units are VTPS-IV, RTPP-II, RTPP-III, KTPS-VI and Kakatiya-I. Until now as far as we know the PPAs with APGENCO for these plants are not yet approved by the Commission. Under the existing legal and regulatory structure the erection power plants shall commence only after the Commission approves the PPA. But here even when the plants are ready to inject power in to the state grid there is no sign of the PPAs. It is a very disturbing sign. It is a wanton bypassing of the Commission's mandate and powers. On the other hand, it also may indicate abdication of responsibility and powers on the part of the Commission. We request the Commission to direct the Licensees to make all the PPAs public and conduct public hearings before approving or rejecting these PPAs.

Table 5: Capital Costs of new GENCO Plants Rs/U

Station	Fixed	Variable	Total Cost

	Cost	Cost	
VTPS – IV	1.49	1.42	2.94
RTPP – II	1.55	1.77	3.35
RTPP – III	2.41	1.77	4.21
KTPS – VI	1.67	1.13	2.81
Kakatiya – I	1.86	1.16	3.05
Simhadri – II	1.05	1.58	2.63
UMPP – Mundra	0.98	1.28	2.26

3.6.3 A look at the above table shows that the fixed costs of the new GENCO plants are inflated. A comparison with NTPC's Simhadri – II plant will help to put it in proper perspective. Like the new GENCO plants the NTPC plant is also a new unit. The fixed cost for the NTPC's Simhadri II is Rs. 1.05 per unit. Compared to this the fixed costs of new GENCO units are higher by more than 50%. The additional burden on the consumers because of this inflated fixed cost of new GENCO units is about Rs. 930 cr. We request the Commission not allow these higher fixed costs and benchmark the fixed costs of GENCO's new plants with NTPC's Simhadri – II unit. We request the Commission to allow fixed cost of Rs. 1.O5 per unit only for the new GENCO units.

3.6.4 In the tariff filings for the year 2010-11 the unit fixed cost for RTTP – II was shown as Rs. 2.02. But in the tariff filings for the ensuing year 2011-12 this fixed cost is shown as Rs. 2.41 per unit. There is no explanation how the fixed cost per unit increased by 39 paise within a year.

In awarding contracts to execute these projects, newspaper reports show that, APGENCO violated the norms prescribed by CEA. According to the CEA norms in bidding for the Balance of Plant (BoP) works the eligibility criteria is that the concerned entity in the last seven years should have executed works with a capacity of 100 MW and annual turnover should have been Rs. 400 crore. But this was arbitrarily changed to 300 MW and Rs. 500 crore. Because of this the number of eligible entities had come down drastically creating the ground to rig the bidding. The burden on APGENCO and consumers in the state in turn would be about Rs. 600 crore.

3.6.5 Even after the bidding there is wide variation in the costs of these BoP works. According to a report in Andhra Jyothi (dt.24-11-2010) BoP works of RTPP IV was sanctioned for Rs. 1,255 crore while similar works for Kakatiya plant at Bhupalapally was sanctioned at Rs. 723

crore. The difference is Rs. 532 crore. This unjustified amount is to be borne by the consumers in the state.

3.6.6 DISCOMs' filings show that there was delay in operationalising new plants. According to DISCOMs' filings there was delay of two months in scheduled date of commencement of operation of KTPP – I (from 1st August 2010 to 1st October 2010) resulting in shortfall of 614 MU and delay in scheduled date of commencement of operation of NTPC Simhadri Stage – II by three months (from 1st December 2010 to 1st April 2011) resulted in shortfall of 328 MU (APCPDCL Tariff Proposals p.vi). Because of this short fall DISCOMs were forced buy power in the open market at higher price which in turn burdened the consumers. We would like to know from the DISCOMs whether they intend to recover liquidated damages from APGENCO and NTPC for delay in starting the new plants.

Opportunities Available - New IPPs

Table 6: Expansion Units as Merchant Plants:

Company	**Capacity MW**
Lanco	1740
GVK	400
Gouthami	1200
Konaseema	820
Vemagiri	820
Vemagiri – Barge mounted	320
Spectrum	1350
Total	6650

3.7.1 The existing IPPs in the state are planning expansion units adjacent to the existing units. These are being set up as merchant plants. Already one of these plants, Lanco unit started power generation and was in the news for selling this power to Tamil Nadu even when our state was in urgent need of this power. Once a plant is categorized as a merchant plant the developers will be free to sell power from such units to any consumer in the country at any price. The Commissions will have no control on such plants. But the Tariff Policy provides some scope to deal with such situations. According to Section 5.1 of this Policy, "All future requirements of power should be procured competitively by distribution licensees except in cases of expansion of existing projects or where there is a State controlled /owned company as an identified developer and where regulators will need to resort to tariff determination based on norms provided that expansion of generation capacity by private developers for this purpose would be restricted to one time addition of not more than 50% of the existing capacity". For the existing plants all the necessary facilities like land, fuel linkage and transmission connectivity were provided by the state or state owned entities. It is not proper for the IPPs to literally walk away from the state once obtaining all clearances. The total existing capacity of the IPPs in the state is 2500 MW. Given the scope provided by the Tariff Policy we request the Commission to direct the DISCOMs to enter in to long term PPAs with these IPPs for capacity equivalent to 1250 MW.

3.7.2 A report in Andhra Jyothi dated 4-6-2010 mentioned that Konaseema was interested in selling the power from the extension unit. We would like to know whether the DISCOMs are pursuing this issue with the developers and the progress so far.

3.8 The PPA with BPL for 500 MW thermal plant at Ramagundam approved by the Commission was subsequently cancelled as the company failed to achieve financial closure. The setting up of this unit can be taken up by either APGENCO or any private developer selected through open competitive bidding. In the initial stages the government of AP said that APGENCO would be taking up the project. It is disturbing to note that the Commission through the letter No. E-356 (a)/Engg/DD(P&PP)/2010-02 dated 31 May 2010 has consented to revival of PPA with BPL and also changes to important aspects of the earlier PPA with out any public hearing. The above letter is against the interests of the people of the state. Commission's decision goes against the legal opinion that the cancelled PPA cannot be revived to the previous party. New developer needs to be selected through a open competitive bidding and the same should have been examined through a public process. Commission's Order in response to a letter, not even a proper petition, from the old developer raises many disturbing questions. It may be surmised that the public hearing was not taken up as the developer in question as well as DISCOMs did not want to face inconvenient questions. It may also be surmised that the Commission has succumbed to pressure from the state government and the private developer. We request the Commission to cancel the approval given to the BPL PPA through the above letter and conduct a public hearing on the same after making all the related documents of the case public.

3.9 Hinduja's 1000 MW Visakhapatnam thermal power plant was one of the three fast track projects selected nearly 15 years back at the national level to set up power plants in AP. These plants were planned taking in to account power needs of the state. While GVK's Jeegurupadu unit started power generation 9 years back the fate of BPL's Ramagundam unit is hanging in balance as referred to in the above paragraph. The PPA of Hinduja's plant even after 15 years is yet to come before the Commission for approval. In fact Hinduja's company should be paying a tidy sum toward liquidated damages given this enormous delay in setting up the plant. We learn that Hindujas lobbied with the powers that be to convert this plant in to a merchant plant. As this plant was planned one and half decades back taking the power needs of the state into consideration and given the present power deficit in the state this plant cannot be allowed to be converted in to a merchant power plant. If Hindujas are not ready to take up this project a new private developer should be selected through open competitive bidding.

3.10 A mini hydro plant of 24 MW capacity is proposed to be set up by a private developer – SLS Power Corporation - at Dummagudem anicut in Khammam district. The developer has entered in to a PPA with Tata Power Corporation, Mumbai. NEDCAP has given clearance to this project. At a time when DISCOMs in the state are not able to fulfill the RPPO of 5% how did NEDCAP gave clearance to this project? And how are DISCOMs going to allow this power to be sold outside the state when they are running short of renewable energy?

AGRICULTURE CONSUMPTIONE

4.1 The ARR and Tariff Proposals for the FY 2011-12 show that LT agriculture accounts for 21.27 percent of the power to be supplied in the state. As in the past this time also these estimates lead to many questions.

4.2 There is no uniformity among the DISCOMs in explaining the estimation of agriculture consumption. While SPDCL tried to give estimate based on different sources of data NPDCL did not at all explain the basis for its estimation. CPDCL just gave the example of Moinabad mandal. But there was no explanation about the number of agricultural services and the DTRs servicing them. We request CPDCL and NPDCL provide district/circle wise data on number of agricultural connections, number of DTRs servicing them, number of sample DTRs, number of valid DTR readings, and the related agriculture consumption estimate.

4.3 CPDCL in its ARR and Tariff Proposals maintained that it was compelled to extend the supply beyond the stipulated seven hours to save to save the standing crops (p.43). In this regard we would like to know circle wise the months and number of days in each month when supply was given for more than seven hours, total quantum of power supplied in excess, whether it obtained the permission of the Commission to supply power in excess to this subsidized category and who will bear the burden of this subsidy?

4.4 There was no explanation on progress in grounding new ISI methodology for estimation of agriculture consumption in the filings of the respective DISCOMs.

4.5 We request the DISCOMs to provide us information on the number of DTRs metered over and above the sampled DTRs, number of HVDS – DTRs serving agriculture loads, total capacity of these HVDS – DTRs and total capacity of all the DTRs serving agriculture loads.

4.6 A news item in Andhra Jyothi dated 8-7-2010 mentioned that the representatives of Bureau of Energy Efficiency made a presentation to the AP Power Coordination Committee on using energy efficient agricultural pumps which helps to reduce power consumption by 20%. This would lead to saving of nearly 3600 MU of power in the state. It also seems to have proposed a pilot project to examine this. We would like to know if there is any progress in this.

4.7 The Tariff Order for the year 2010-11 mentioned tariff for category HT - IV (B) related to lift irrigation schemes maintained by co-operative societies as '0'. In the ARR and Tariff Filings for the ensuing year (2011-12) also mention the tariff as '0'. Neither the Tariff Order nor the proposals for the ensuing year provide any qualifications to be eligible for this tariff. But field reports indicate that the DISCOMs are collecting tariffs at the rate provided for HT - IV (A) category. In the case of HT - IV (A) the electricity bills are paid by the state government and the burden on the farmers is negligible. In the case of HT - IV (B) consumers they are being forced to pay the electricity bills. Farmers under both the kinds of lift irrigation schemes pay water cess on the lines of famers under canals of major and medium irrigation projects. But in the case of farmers under HT - IV (B) lift are also being forced to pay electricity bills though the Tariff Order mentions the relevant tariff as '0'. As the last years (2010-11) tariff proposals indicated merger of the two categories the state government may be directed to pay the electricity bills of the HT - IV(B) schemes. These schemes constitute only 3 to 5% of the total lift schemes as mentioned in the Tariff Order 2010-11 (para.168).

STANDARDS OF PERFORMANCE

5.1 According to SoP Regulations DTR failure is to be addressed within 24 hours in urban areas and 48 hours in rural areas. CPDCL's filings show that in Kurnool circle it took on an average 288 hours to address DTR failures. Similarly, in Mahaboobnagar circle it took on an average 432 hours to address DTR failures. SoP Regulation also provides for compensation to be paid by the Licensee if the problem was nor addressed within the stipulated time. As in the above cases there was enormous delay in addressing the problem we would like to know whether CPDCL paid compensation to the consumers under the DTRs which were not rectified in time and if compensation was not paid reasons for the same.

5.2 On 4th February 2011 a woman (Eerla Sayamma aged 52 years) died and several people collapsed due to electrical shocks when high voltage electricity passed through the walls of all houses in the Khanapur village in Kalher mandal of Medak district. Such deaths need to be considered as murders committed by the DISCOMs. In this context we would like to draw attention to the Commission's direction (para 330 of Tariff Order 2010-11) on improving single phase HVDS transformers. The Commission also stipulated that these works shall be completed by 31st March 2011. The responses of the DISCOMs to this directive are far from satisfactory. CPDCL stated that it would take up the work but in a phased manner. EPDCL stated that the directive is under process. Relevant response of NPDCL did not address this issue. SPDCL maintained that running neutral wire from the substations was a costly exercise. It suggested that improving the earthing in case of single phase DTRs duly separating the HT and LT neutrals accidents can be avoided. We understand that the project cost estimates include cost of drawing the neutral wire.

TARIFF PROPOSALS

6.1 We welcome the proposal to reduce minimum charges for LT-I category for connected load above 250 W from Rs. 50 per month to Rs. 25 per month.

6.2 The new tariff proposals also include an additional tariff of 50 paise/unit on LT – II (non-domestic/commercial) category consumers whose consumption exceeds 100 units/month during February – May period. The consumption limit may be increased to more than 250 units/month as the present proposal will burden petty traders whose monthly consumption exceeds 100 units/month.

6.4 In the present proposals the tariff for advertisement hoardings (a sub-category LT – II) is to be Rs. 7.50 per unit.. While this is a welcome sign we are of the opinion that there is scope to increase this. This tariff can be bench marked to the solar power and as such this can be increased to Rs. 14 per unit as done in the state of Maharashtra.

6.5 DISCOMs also proposed collection of provisional FSA of Rs. 0.25 per unit. In stead they may be directed to submit all relevant information in time and claim their due during the relevant period following the relevant process under the existing Regulations.

PRAYER TO THE COMMISSION

1. Not to allow high fixed costs of new GENCO plants.
2. Not to allow conversion of Hinduja’s Visakhapatnam plant in to a merchant plant.
3. Improve implementation of SoPs.
4. To allow the objector to be heard in person before the Commission takes any decision on this application of the DISCOMs.