APFAPA

A.P.FERRO ALLOYS PRODUCERS' ASSOCIATION

(Reg.No.291/11)

Flat No: FF6, Gitanjali Apartments, Tikkle Road, Mogalrajpuram, Vijayawada-520010, A.P.
E-mail: apfapa@rediffmail.com Cell : 9966039006.

To
The Secretary,
Hon'ble A.P.Electricity Regulatory Commission,
Singareni Bhavan, Red Hills,
HYDERABAD.

Date: January 08, 2024

Sir,

Sub: ARR and Tariff applications filed by Discoms for the year 2024-25 – filing of submissions/suggestions by A.P.Ferro Alloys Producers Association – reg.

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

In response to the Notification, the A.P.Ferro Alloys Producers Association files Its submissions/suggestions to the A.P.Electricity Regulatory Commission Against the Tariff proposals of Retail Supply Business for the year 2024-25.

We are enclosing herewith the copies of receipts of couriers sent to EPDCL, SPDCL and CPDCL 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 At the Public Hearings for the above Discoms at EPDCL and SPDCL and to make Additional submissions at the time of hearings.

Thanking you,

Yours faithfully,

For A.P.Ferro Alloys Producers' Association,

Authorised Signatory.

Encl: as above.

Cc to: CGM (PPA, RA&QC) EPDCL, Vizag /CGM (Operations) SPDCL, Tirupati /CGM (RAC) CPDCL Vijayawada

JD/Tariff
08/01/24
Secretary(I/c)

Andhra Pradesh Electricity Regulatory Commission * Hyderabad *
135
08 JAN 2024

DTDC Express Limited
Regd.Office: No-3,Victoria Road
Bengaluru - 560047

ORIGIN: Hyd | DEST: Vizag
POUCH NO. | DATE: 8/1/24

Non Negotiable Consignment Note / Subject to Bengaluru Jurisdiction.

The consignment note is not a tax invoice. A tax invoice will be made available by DTDC or it's channel partner as the case may be, upon request.

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1
Sender's (Consignor) Name: Ph:
Company Name&Address: AG Ferro Alloys prod
City: State: Vijayawada PIN Code: 520010
Sender's GSTIN*: *Where Applicable

2
Recipient's (Consignee) Name: The chief general Ph:
Company Name&Address: manager, ESDC
City: Visakhapatnam State: PIN Code: 530013
Recipient's GSTIN*: *Where Applicable

3 Nature of consignment: Dox ☐ Non-Dox ☐ | Total Num Pcs:
DIM 1: L cm X B cm X H cm X Pcs | Actual Wt.: kg
DIM 2: L cm X B cm X H cm X Pcs | Volumetric Wt.: kg
DIM 3: L cm X B cm X H cm X Pcs | Chargeable Wt.: 1 kg

4 Description of Content: 1 Dwg
Total Value of consignment for carriage / E-Way bill: ₹

5 Paper Work Enclosures

6 Type of consignment (✓): Commercial ☐ Non Commercial ☐
7 Value Added Services (✓): Secure Pack 7.1 ☐ Passport 7.2 ☐ COD 7.3 ☐ Sunday Plus 7.4 ☐ Office Collect 7.5 ☐
CN Expiry Date

8 Mode (✓): Surface ☐ Air cargo ☐ Express ☐

9 I/We declare that this consignment does not contain personal mail, cash, jewellery, contraband, illegal drugs, any prohibited items and commodities which can cause safety hazards while transporting

10 Charges	Amount (₹)
a) Tariff (incl. of FSC+GST)	
b) Value Added Service Charges	
c) Risk Surcharge	290
d) Total amount (a+b+c)	

Above charges are inclusive of GST & other taxes if applicable
Mode of Payment: Cash ☐ Card ☐ Wallet ☐

Consignment Number: V69389482

Sender's Signature & Seal
Date: Time: AM/PM
I have read and understood terms & conditions printed overleaf of this consignment note and I agree to the same.

11 Booking Branch / Franchisee Code
Courier Signature

12 Risk Surcharge: Owner ☐ Carrier ☐

13 Receiver's Name:
Relationship:
Company Stamp & Signature: COMPANY SEAL
Ph No.: Date: DD / MM / YY Time AM/PM

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http://www.dtdc.in || customersupport@dtdc.com || +91-7305770577 POD COPY March 2023

Item : DTDC 'V'series Cnote sheet with - 8.5 x 6 x 3 | Item Code : 11000067/VS 02 | Vendor Code : 100001 | V SERIES | DTDC V Series Cnote POD

A - 16

DTDC Express Limited
Regd.Office: No-3,Victoria Road
Bengaluru - 560047

ORIGIN: | DEST: TPT
POUCH NO. | DATE: 8/1/24

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1
Sender's (Consignor) Name: Ph:
Company Name&Address: AG Ferro Alloys
City: State: PIN Code:
Sender's GSTIN*: Vijayawada 520010 *Where Applicable

2
Recipient's (Consignee) Name: The chief general manager
Company Name& Address: Tirupati 517501
City: State: PIN Code:
Recipient's GSTIN*: *Where Applicable

3 Nature of consignment: Dox ☐ Non-Dox ☐ | Total Num Pcs:
DIM 1: L cm X B cm X H cm X Pcs | Actual Wt.: kg
DIM 2: L cm X B cm X H cm X Pcs | Volumetric Wt.: kg
DIM 3: L cm X B cm X H cm X Pcs | Chargeable Wt.: kg

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Mode of Payment: Cash ☐ Card ☐ Wallet ☐

Consignment Number: V69389481

Sender's Signature & Seal
Date: Time: AM/PM
I have read and understood terms & conditions printed overleaf of this consignment note and I agree to the same.

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Courier Signature

12 Risk Surcharge: Owner ☐ Carrier ☐

13 Receiver's Name:
Relationship:
Company Stamp & Signature: COMPANY SEAL
Ph No.: Date: DD / MM / YY Time AM/PM

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DTDC Express Limited

Regd.Office: No-3,Victoria Road
Bengaluru - 560047

ORIGIN	Hyd	DEST.	USA
POUCH NO.		DATE	8/11/24

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The consignment note is not a tax invoice. A tax invoice will be made available by DTDC or it's channel partner as the case may be, upon request.

1

Sender's (Consignor) Name: Ph:

Company Name & Address: Aditya Arts Prod Associates

City: State: PIN Code:

Sender's GSTIN*: Vijayawada - 520010 *Where Applicable

2

Recipient's (Consignee) Name: The Chief Manager Ph:

Company Name & Address: P&G Vijayawada

City: State: PIN Code:

Recipient's GSTIN*: *Where Applicable

3 Nature of consignment Dox ☐ Non-Dox ☐

DIM 1: L ___ cm X B ___ cm X H ___ cm X ___ Pcs

DIM 2: L ___ cm X B ___ cm X H ___ cm X ___ Pcs

DIM 3: L ___ cm X B ___ cm X H ___ cm X ___ Pcs

Total Num Pcs:

Actual Wt.: kg

Volumetric Wt.: kg

Chargeable Wt.: kg

4 Description of Content

Total Value of consignment for carriage / E-Way bill ₹

5 Paper Work Enclosures

6 Type of consignment (✓)

Commercial ☐

Non Commercial ☐

7 Value Added Services (✓)

Secure Pack 7.1 ☐ Passport 7.2 ☐

COD 7.3 ☐ Sunday Plus 7.4 ☐ Office Collect 7.5 ☐

CN Expiry Date

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Consignment Number: V69389483

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c) Risk Surcharge	
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Above charges are inclusive of GST & other taxes if applicable

Mode of Payment: Cash ☐ Card ☐ Wallet ☐

11 Booking Branch / Franchisee Code

Courier Signature

12

Risk Surcharge	Owner	☐
	Carrier	☐

13 Receiver's Name:

Relationship:

Company Stamp & Signature: COMPANY SEAL

Ph No.: Date: DD / MM / YY Time ___ AM/PM

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Item Code : 110000067/VS 02 - 8.5 x 6 x 3

Vendor Code : 100001

14-4-2023 DTDC V Series 1st Copy P.O.D.

BEFORE THE HONOURABLE ANDHRA PRADESH ELECTRICITY REGULATORY COMMISSION
AT ITS OFFICE AT 4th 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 2024-25 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 EASTERN POWER Distribution Company of Andhra Pradesh Limited ('APEPDCL' or 'the Company' or 'the Licensee') as the Distribution and Retail Supply Licensee.

In the matter of

EASTERN POWER DISTRIBUTION COMPANY OF ANDHRA PRADESH
Between:

Eastern Power Distribution Company of Andhra Pradesh

And
A.P.FERRO ALLOYS PRODUCERS' ASSOCIATION

This has reference to the ARR Petitions for FY 2024-25 filed by Andhra Pradesh EASTERN Power Distribution Company Limited (APEPDCL) in respect of its distribution and retail supply business in the State of Andhra Pradesh. The Public Notice under ref. has been published by APERC wherein views/objections/suggestions have been invited from the public. We represent the various Ferro Alloy Manufacturing Units in the State of Andhra Pradesh and we would like to be heard in person during the Public Hearing through video conference to be held at Conference Hall of the APEPDCL at Visakhapatnam from 29-01-2024 to 31-01-2024.

Ferro Alloy Industries are basically situated in 4 States i.e. Andhra Pradesh, West Bengal DVC, Chattisgarh and Odisha. The net power tariff in other 3 States is much lower than the Tariff in AP. The domestic as well as export orders are booked by the Industry at a fixed price and no escalation in price is accepted by the consumers.

The tariff was constant for over a decade and the no.of plants have grown up from 6 to 39 and more than Rs.5,000 crores investment come to the State. For survival and continuous running at full capacity of these units, special consideration is required:

We are hereby forwarding our views/objections/suggestions in the matter and these are being filed on behalf of a category of consumers' i. e. Ferro Alloy Consumers.

Views / Objections / Suggestions:

1. **NOT TO LEVY ANY DEMAND CHARGES**:

The Ferro Alloy Industries since long have been included by the APERC in the Energy Intensive Consumer Category along with some other industries, since the expenses incurred by such industries towards purchase of power forms a substantial part of their total expenditure. The Ferro Alioy sector has its own peculiarities since its business is largely related to export import activities and therefore is subject to fluctuations in the International market. Further, the Ferro Alloy Units almost always operate their businesses with very thin margins and any variations in the prices of raw material/ finished product in the National/ International market adversely impacts their businesses. Most importantly, the Ferro Alloy Industries in the State of Andhra Pradesh offer direct and indirect employment to a very large segment of population. Keeping these factors in mind the APERC as well as the AP Govt. have in the past provided some sort of concessions to the Ferro Alloy Units mainly to ensure that such Units continue to have their survival, which is otherwise vital for the State and is in the larger public interest.

The tariffs for Ferro Alloy Units were separately fixed by the APERC since 2002 in comparison to other industries in general (Industry – General). Over the years many Ferro Alloy Industries still however could not survive and have since closed their Units. The AP State Govt. accordingly had approved subsidy in the past for survival of such units. The retail supply tariffs fixed by APERC used to treat the Fixed Charge as zero for this category. However, the APERC fixed a tariff for energy intensive consumers in FY 2023-24 wherein the Fixed Charge at the rate of Rs. 475/kVA/month was introduced. Through the present ARR petitions for FY 2024-25 the three DISCOMs have again proposed the said Fixed Charge at the rate of Rs. 475/kVA/month in respect of energy intensive industries.

We have extracted the related data from the ARR petitions filed by the three DISCOMs. The data furnished by APEPDCL indicates the contract demand (MVA) and the projected energy sale (MU) in respect of various consumer categories. Such information is also presented voltage wise for different consumer categories. Based on such data we have calculated the Load Factor (LF) at which the consumers under HT Industry – General category would operate. The LF in respect of HT Energy Intensive Industry category is also calculated and the same is presented here under:

APEPDCL

HT INDUSTRY - GENERAL (2024-25)				
Voltage Level	***Contract Demand (MVA)***	***Projected Energy Sales (MU)***	***Max Energy Sale (MU)***	***Load Factor (%)***
11 KV	*619.01*	*1713.69*	*5422.53*	*31.60%*
33 KV	*595.94*	*2486.46*	*5220.43*	*47.63%*
132 KV	*440.33*	*1869.97*	*3857.29*	*48.48%*
220 KV	*298.00*	*1436.96*	*2610.48*	*55.05%*
Total	***1953.28***	***7507.08***	***17110.73***	***43.87%***

HT INDUSTRY - ENERGY INTENSIVE (2024-25)				
Voltage Level	***Contract Demand (MVA)***	***Projected Energy Sales (MU)***	***Max Energy Sale (MU)***	***Load Factor (%)***
11 KV	*0*	*0*	*0.00*	*0.00%*
33 KV	*27.37*	*225.91*	*239.76*	*94.22%*
132 KV	*331.40*	*2534.55*	*2903.06*	*87.31%*
220 KV	*259.00*	*1960.15*	*2268.84*	*86.39%*
Total	***617.77***	***4720.61***	***5411.67***	***87.23%***

It may be seen that while the HT Industry – General consumers would operate at average LF of just 43.87%, the HT Energy Intensive Industry category consumers would operate their units at a very large average LF of 87.23%.

We have extracted similar information in respect of APSPDCL and APCPDCL and the same is as under:

APSPDCL

HT INDUSTRY - GENERAL (2024-25)

Voltage Level	Contract Demand (MVA)	Projected Energy Sales (MU)	Max Energy Sale (MU)	Load Factor (%)
11 KV	483.68	979.76	4237.04	23.12%
33 KV	670.69	2462.37	5875.24	41.91%
132 KV	681.92	3482.13	5973.62	58.29%
220 KV	113.30	585.94	992.51	59.04%
Total	**1949.59**	**7510.20**	**17078.41**	**43.97%**

HT INDUSTRY - ENERGY INTENSIVE (2024-25)

Voltage Level	Contract Demand (MVA)	Projected Energy Sales (MU)	Max Energy Sale (MU)	Load Factor (%)
11 KV	0.56	1.57	4.91	32.00%
33 KV	34.04	211.58	298.19	70.95%
132 KV	76.94	463.97	673.99	68.84%
220 KV	0.00	0	0.00	0.00%
Total	**111.54**	**677.12**	**977.09**	**69.30%**

APCPDCL

HT INDUSTRY - GENERAL (2024-25)

Voltage Level	Contract Demand (MVA)	Projected Energy Sales (MU)	Max Energy Sale (MU)	Load Factor (%)
11 KV	586.95	1048.96	5141.68	20.40 %
33 KV	409.85	1591.92	3590.29	44.34 %
132 KV	132.48	641.33	1160.52	55.26 %
220 KV	0.00	0	0.00	0.00%
Total	**1129.28**	**3282.21**	**9892.49**	**33.18 %**

HT INDUSTRY - ENERGY INTENSIVE (2024-25)

Voltage Level	Contract Demand (MVA)	Projected Energy Sales (MU)	Max Energy Sale (MU)	Load Factor (%)
11 KV	0.27	1.17	2.37	49.47 %
33 KV	0	0	0.00	0.00%
132 KV	0.00	0	0.00	0.00%
220 KV	0.00	0	0.00	0.00%
Total	**0.27**	**1.17**	**2.37**	**49.47 %**

The said data for all the above three DISCOMs is combined to make it on the State level, as under

AP STATE (Combined for all the three DISCOMs)

HT INDUSTRY - GENERAL (2024-25)

Voltage Level	Contract Demand (MVA)	Projected Energy Sales (MU)	Max Energy Sale (MU)	Load Factor (%)
11 KV	1689.64	3742.41	14801.25	25.28%
33 KV	1576.48	6540.75	14685.96	44.54%
132KV	1254.73	5993.43	10991.43	54.53%
220 KV	411.3	2022.90	3602.99	56.15%
Total	**5032.15**	**18299.49**	**44081.63**	**41.51%**

HT INDUSTRY - ENERGY INTENSIVE (2024-25)

Voltage Level	Contract Demand (MVA)	Projected Energy Sales (MU)	Max Energy Sale (MU)	Load Factor (%)
11 KV	0.83	2.74	7.27	37.68%
33 KV	61.41	437.49	537.95	81.33%
132 KV	408.34	2998.52	3577.06	83.83%
220 KV	259	1960.15	2268.84	86.39%
Total	**729.58**	**5398.9**	**6391.12**	**84.48%**

From the above information it is clear that the consumers under the HT Industry – General category operate at a very low LF of 41.51% but the consumers under the HT Energy Intensive Industry category operate their industrial units at a very high LF of 84.48%. It may be seen that the APDISCOMs would recover a very small quantum of revenue per kVA from the HT Industry – General category consumers while the same APDISCOMs would be recovering revenue per kVA at a very high level from the HT Energy Intensive Industry category consumers.

In this regard it is to state that the APDISCOMs through the present ARR petitions have proposed to continue Fixed Charge tariff @ Rs. 475/kVA/month for HT Category Energy Intensive Industry. Going by the high load factor the M D Charges cannot be more than Rs.233.40 per kVA/month. – General category consumers. The DISCOMs would recover their fixed cost at this rate from the Industry – General category consumers. The corresponding rate of Fixed Charge at the LF of 84.48% works out to just Rs. 233.40/kVA/month. However, despite the above position the AP DISCOMs have still proposed the Fixed Charge tariff @ Rs. 475/kVA/month for HT Energy Intensive Industry category consumers.

However, recognizing the difficulties of these Industries in the current year in view of simultaneous imposition of Demand Charges, Enhancement of Electricity Duty by 94 paise along with levy of past and current FPPCAs and Distribution True up charges, The Government of Andhra Pradesh on Representation of the Association has waived off 90% of the Demand Charges for the current year along with withdrawing the increase in Electricity Duty of 94 paise for Survival of the Industry.

Hence keeping the above in view we humbly appeal to the Hon'ble Commission **NOT TO LEVY ANY DEMAND CHARGES FOR THE ENSUING TARIFF YEAR** and help recovery of the ailing Sector in the State.

2. <u>BILLING OF MINIMUM ENERGY ON DEMAND RECORDED</u>:

This is regarding the Specific Condition stipulated by the APERC vide its RST Order passed for FY 2023-24. Such condition at page no. 212 is applicable in respect of the HT - Energy Intensive Industries consumers. It stipulates that energy charges will be billed based on actual energy consumption or 50 kVAh/kVA/month **of contracted demand**, whichever is higher.

As stated in the opening paras, the Ferro Alloy industries in AP are facing very tough times and some industries in this category have already closed down / operating at low loads. There would be certain occasions during FY 2024-25 as well wherein some industries from this sector may have to be closed down or may have to be operated at low loads during part of the year. Under such circumstances such Ferro alloy industries will be liable to pay the energy charge corresponding to the minimum energy consumption of 50 kVAh/kVA/month as stated herein above. This condition is also proposed by the APDISCOMs to be continued during FY 2024-25.

In this regard, it would be prudent to state that a similar condition also prevails in the State of Telangana, which was carved out of the then combined state of Andhra Pradesh. As per clause no. 10.29.5 of the RST Order passed by the TSERC for FY 2023-24, the energy charges will be billed based on actual energy consumption or 50 kVAh/kVA/month **OF BILLING DEMAND**, whichever is higher. Such condition stipulated by the TSERC appears quite transparent and practical.

You are therefore requested to please stipulate a similar condition for HT Energy Intensive Industries in the RST Order to be passed for FY 2024-25 by incorporating the condition that the energy charges will be billed based on actual energy consumption or 50 kVAh/kVA/month **OF BILLING DEMAND**, whichever is higher and oblige us.

3. **<u>CERTAINTY OF TARIFF</u>**:

We would like to bring to the notice of this Hon'ble Commission that in the recent past i.e. during the years 2012-13, the then FSA (Fuel Surcharge Adjustment) had been repealed by APERC in view of the widespread damage caused to several Industries in the State because of the Levy of cumulative FSAs of past leading to closure of number of units. After such Repealing, Annual True up was adopted in place of quarterly FSA much to the relief of Consumers of all categories. This improved the Certainty and Visibility of the Tariff for the year and provided the much needed 'Ease of Doing Business' as intended by Electricity Reforms. However in the name of delay in realizations and thereby the carrying costs suffered by DISCOMs, FPPCA was brought in again much to the discomfiture of the Consumers. Once again, simultaneous levy of several FPPCAs, True ups of high magnitude has again landed the Consumers in misery owing to successive Tariff Shocks much against the intent of the Electricity Act.

In line with the Government's policy for supply of power 24x365 discoms are procuring the power at available rate in the market to meet the consumer meets. However, the high cost of power is being passed on to the consumers in the form of FPPCA and Ferro Alloys Sector is not in a position to absorb this high cost as all the orders of this sector from consumers is at a fixed price. Hence, there is no scope to absorb this additional burden. This sector requires certainty in tariff without any hike. Keeping the above in view, we suggest:-

1. As Ferro Alloys Sector is not in a position to absorb any additional burden on power tariff as the power component constitutes 35-75% of variable cost the industry is ready to reduce their loads based on prior intimation thereby reducing their production. We are fully aware there is no such mechanism available as on date and we humbly request to

Hon'ble Commission to evolve a mechanism so that the industry operates at a visible tariff and do not bleed their working capital by paying true up/FPPCA charges.

Alternatively,

2. We humbly appeal to this Hon'ble Commission to review the harsh FPPCA mechanism by limiting all kinds of Charges like FPPCA and True ups of all kinds to 10% of the Energy Charges throughout the year and balance to be made a part of ARR to become a part of ensuing year's Tariff so that there is Certainty in Tariff to ensure visibility of costs in the interest of Natural Justice and Ease of Doing Business.

4.**REQUEST FOR RECOMMENDATION TO REDUCE ELECTRICITY DUTY**:

To further reduce the burden of the Industrial Consumers in this hour of transition, we request Hon'ble Commission to kindly advise the Government of Andhra Pradesh to continue the exemption from Increase in Electricity Duty of 94 paise for the ensuing years also keeping its Energy Intensive and Price Sensitive nature.

5.**DE-RATION/RE-RATION OF CMD**:

Reduction of notice period from 30 days to 7 days for de-ration will help the Industry run efficiently. At present as per GTCS conditions 30 days notice is required for de-ration and for re-ration proposal has to go to the Transco and their approval is required for re-ration. As Ferro Alloys market is most volatile, we request a suitable mechanism may please be developed for this Industry either for de-ration or re-ration in one week time so that Industry need not pay demand charges when the plant is stopped and when the circumstances are favourable, the Industry can operate continuously. In case our request for withdrawal of demand charges is considered, this request need not be considered.

6. **GREEN ENERGY OPEN ACCESS**:

The World is facing extreme climate events in view of increased Greenhouse Gases and the Heads of Nations have made several International Commitments towards mitigation of Climate Change and Adoption of Renewable Energy is one of them. In line with this Central Government has launched 'Green Energy Open Access ' and this Hon'ble Commission also has published the Draft ' Green Energy Open Access , Charges and Banking Regulations-2023'. As the window period for ISTS charges waiver is time bound, we request Hon'ble Commission to kindly adopt this Regulation expeditiously in the spirit of Promotion of Renewable Energy and to give a Fillip to Make in India Program without insisting on the ceiling limit of 30% of DISCOM consumption for Banking. This would go a long way in not only providing Power to the Industries but also help in decarbonizing Manufacturing so that we can be globally competitive in face of implementation of 'Carbon Tax' by several Countries.

Finally, the Association is only looking for a fixed tariff for a period of one year so that the Industry can take a decision whether TO RUN the Industry or NOT.

With this uncertain demands like FPPCA & True Up charges industry will bleed and this gives raise to Industry becoming NPA. The Industry at present is bleeding heavily and Plants are getting closed. If the above steps are implemented this will help the industry to restart and revive their operations.

In Conclusion, We pray Hon'ble Commission to kindly,

1. Withdraw the proposed Demand Charges to Energy Intensive Category specifically for Ferro Alloys
2. Minimum Energy Charges may be collected on Billing Demand (80% of Contracted Demand) and not on Contracted Demand as existing.
3. To evolve a suitable mechanism to inform industry in advance for reduction loads so that the industry do not avail high cost power or restrict the FPPCA and True up Charges to a maximum of 10% of Energy Charges per month.
4. Advise Government of Andhra Pradesh to continue to exempt levy of increased Electricity Duty of 94 paise for coming years also.
5. Request for reduction of de-ration/re-ration period
6. Adopt Green Energy Open Access, Charges and Banking Regulations-2023 expeditiously as requested.

We also request that the Association may be given time for personal hearing and also to make further submissions

Thanking You.

Yours Sincerely,

For AP Ferro Alloy Producer's Association

Authorized Signatory

CC: - 1) Copy of WBERC Tariff Regulations, 2011
2) Copy of the RST order passed by the TSERC for FY 2023-24

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

BEFORE THE HONOURABLE ANDHRA PRADESH ELECTRICITY REGULATORY COMMISSION
AT ITS OFFICE AT 4th 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 2024-25 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 Limited OF ANDHRA PRADESH
Between:
Southern Power Distribution Company Limited OF ANDHRA PRADESH
And
A.P.FERRO ALLOYS PRODUCERS' ASSOCIATION

This has reference to the ARR Petitions for FY 2024-25 filed by Andhra Pradesh Southern Power Distribution Company Limited (APSPDCL) in respect of its distribution and retail supply business in the State of Andhra Pradesh. The Public Notice under ref. has been published by APERC wherein views/objections/suggestions have been invited from the public. We represent the various Ferro Alloy Manufacturing Units in the State of Andhra Pradesh and we would like to be heard in person during the Public Hearing through video conference to be held at Conference Hall of the APEPDCL at Visakhapatnam from 29-01-2024 to 31-01-2024.

Ferro Alloy Industries are basically situated in 4 States i.e. Andhra Pradesh, West Bengal DVC, Chattisgarh and Odisha. The net power tariff in other 3 States is much lower than the Tariff in AP. The domestic as well as export orders are booked by the Industry at a fixed price and no escalation in price is accepted by the consumers.

The tariff was constant for over a decade and the no.of plants have grown up from 6 to 39 and more than Rs.5,000 crores investment come to the State. For survival and continuous running at full capacity of these units, special consideration is required:

We are hereby forwarding our views/objections/suggestions in the matter and these are being filed on behalf of a category of consumers i. e. Ferro Alloy Consumers.

Views / Objections / Suggestions:

1. **NOT TO LEVY ANY DEMAND CHARGES**:

The Ferro Alloy Industries since long have been included by the APERC in the Energy Intensive Consumer Category along with some other industries, since the expenses incurred by such industries towards purchase of power forms a substantial part of their total expenditure. The Ferro Alloy sector has its own peculiarities since its business is largely related to export import

activities and therefore is subject to fluctuations in the International market. Further, the Ferro Alloy Units almost always operate their businesses with very thin margins and any variations in the prices of raw material/ finished product in the National/ International market adversely impacts their businesses. Most importantly, the Ferro Alloy Industries in the State of Andhra Pradesh offer direct and indirect employment to a very large segment of population. Keeping these factors in mind the APERC as well as the AP Govt. have in the past provided some sort of concessions to the Ferro Alloy Units mainly to ensure that such Units continue to have their survival, which is otherwise vital for the State and is in the larger public interest.

The tariffs for Ferro Alloy Units were separately fixed by the APERC since 2002 in comparison to other industries in general (Industry – General). Over the years many Ferro Alloy Industries still however could not survive and have since closed their Units. The AP State Govt. accordingly had approved subsidy in the past for survival of such units. The retail supply tariffs fixed by APERC used to treat the Fixed Charge as zero for this category. However, the APERC fixed a tariff for energy intensive consumers in FY 2023-24 wherein the Fixed Charge at the rate of Rs. 475/kVA/month was introduced. Through the present ARR petitions for FY 2024-25 the three DISCOMs have again proposed the said Fixed Charge at the rate of Rs. 475/kVA/month in respect of energy intensive industries.

We have extracted the related data from the ARR petitions filed by the three DISCOMs. The data furnished by APEPDCL indicates the contract demand (MVA) and the projected energy sale (MU) in respect of various consumer categories. Such information is also presented voltage wise for different consumer categories. Based on such data we have calculated the Load Factor (LF) at which the consumers under HT Industry – General category would operate. The LF in respect of HT Energy Intensive Industry category is also calculated and the same is presented here under:

APEPDCL

HT INDUSTRY - GENERAL (2024-25)				
Voltage Level	***Contract Demand (MVA)***	***Projected Energy Sales (MU)***	***Max Energy Sale (MU)***	***Load Factor (%)***
11 KV	*619.01*	*1713.69*	*5422.53*	*31.60%*
33 KV	*595.94*	*2486.46*	*5220.43*	*47.63%*
132 KV	*440.33*	*1869.97*	*3857.29*	*48.48%*
220 KV	*298.00*	*1436.96*	*2610.48*	*55.05%*
Total	***1953.28***	***7507.08***	***17110.73***	***43.87%***

HT INDUSTRY - ENERGY INTENSIVE (2024-25)				
Voltage Level	***Contract Demand (MVA)***	***Projected Energy Sales (MU)***	***Max Energy Sale (MU)***	***Load Factor (%)***
11 KV	*0*	*0*	*0.00*	*0.00%*
33 KV	*27.37*	*225.91*	*239.76*	*94.22%*
132 KV	*331.40*	*2534.55*	*2903.06*	*87.31%*
220 KV	*259.00*	*1960.15*	*2268.84*	*86.39%*
Total	***617.77***	***4720.61***	***5411.67***	***87.23%***

It may be seen that while the HT Industry – General consumers would operate at average LF of just 43.87%, the HT Energy Intensive Industry category consumers would operate their units at a very large average LF of 87.23%.

We have extracted similar information in respect of APSPDCL and APCPDCL and the same is as under:

APSPDCL

HT INDUSTRY - GENERAL (2024-25)

Voltage Level	Contract Demand (MVA)	Projected Energy Sales (MU)	Max Energy Sale (MU)	Load Factor (%)
11 KV	463.68	979.76	4237.04	23.12%
33 KV	670.69	2462.37	5875.24	41.91%
132 KV	681.92	3482.13	5973.62	58.29%
220 KV	113.30	585.94	992.51	59.04%
Total	**1949.59**	**7510.20**	**17078.41**	**43.97%**

HT INDUSTRY - ENERGY INTENSIVE (2024-25)

Voltage Level	Contract Demand (MVA)	Projected Energy Sales (MU)	Max Energy Sale (MU)	Load Factor (%)
11 KV	0.56	1.57	4.91	32.00%
33 KV	34.04	211.58	298.19	70.95%
132 KV	76.94	463.97	673.99	68.84%
220 KV	0.00	0	0.00	0.00%
Total	**111.54**	**677.12**	**977.09**	**69.30%**

APCPDCL

HT INDUSTRY - GENERAL (2024-25)

Voltage Level	Contract Demand (MVA)	Projected Energy Sales (MU)	Max Energy Sale (MU)	Load Factor (%)
11 KV	586.95	1048.96	5141.68	20.40 %
33 KV	409.85	1591.92	3590.29	44.34 %
132 KV	132.48	641.33	1160.52	55.26 %
220 KV	0.00	0	0.00	0.00%
Total	**1129.28**	**3282.21**	**9892.49**	**33.18 %**

HT INDUSTRY - ENERGY INTENSIVE (2024-25)

Voltage Level	Contract Demand (MVA)	Projected Energy Sales (MU)	Max Energy Sale (MU)	Load Factor (%)
11 KV	0.27	1.17	2.37	49.47 %
33 KV	0	0	0.00	0.00%
132 KV	0.00	0	0.00	0.00%
220 KV	0.00	0	0.00	0.00%
Total	**0.27**	**1.17**	**2.37**	**49.47 %**

The said data for all the above three DISCOMs is combined to make it on the State level, as under

AP STATE (Combined for ail the three DISCOMs)									
HT INDUSTRY - GENERAL (2024-25)					*HT INDUSTRY - ENERGY INTENSIVE (2024-25)*				
Voltage Level	*Contract Demand (MVA)*	*Projected Energy Sales (MU)*	*Max Energy Sale (MU)*	*Load Factor (%)*	*Voltage Level*	*Contract Demand (MVA)*	*Projected Energy Sales (MU)*	*Max Energy Sale (MU)*	*Load Factor (%)*
11 KV	*1689.64*	*3742.41*	*14801.25*	*25.28%*	*11 KV*	*0.83*	*2.74*	*7.27*	*37.68%*
33 KV	*1676.48*	*6540.75*	*14685.96*	*44.54%*	*33 KV*	*61.41*	*437.49*	*537.95*	*81.33%*
132KV	*1254.73*	*5993.43*	*10991.43*	*54.53%*	*132 KV*	*408.34*	*2998.52*	*3577.06*	*83.83%*
220 KV	*411.3*	*2022.90*	*3602.99*	*56.15%*	*220 KV*	*259*	*1960.15*	*2268.84*	*86.39%*
Total	*5032.15*	*18299.49*	*44081.63*	*41.51%*	*Total*	*729.58*	*5398.9*	*6391.12*	*84.48%*

From the above information it is clear that the consumers under the HT Industry – General category operate at a very low LF of 41.51% but the consumers under the HT Energy Intensive Industry category operate their industrial units at a very high LF of 84.48%. It may be seen that the APDISCOMs would recover a very small quantum of revenue per kVA from the HT Industry – General category consumers while the same APDISCOMs would be recovering revenue per kVA at a very high level from the HT Energy Intensive Industry category consumers.

In this regard it is to state that the APDISCOMs through the present ARR petitions have proposed to continue Fixed Charge tariff @ Rs. 475/kVA/month for HT Category Energy Intensive industry. Going by the high load factor the M D Charges cannot be more than Rs.233.40 per kVA/month. – General category consumers. The DISCOMs would recover their fixed cost at this rate from the Industry – General category consumers. The corresponding rate of Fixed Charge at the LF of 84.48% works out to just Rs. 233.40/kVA/month. However, despite the above position the AP DISCOMs have still proposed the Fixed Charge tariff @ Rs. 475/kVA/month for HT Energy Intensive Industry category consumers.

However, recognizing the difficulties of these Industries in the current year in view of simultaneous imposition of Demand Charges, Enhancement of Electricity Duty by 94 paise along with levy of past and current FPPCAs and Distribution True up charges, The Government of Andhra Pradesh on Representation of the Association has waived off 90% of the Demand Charges for the current year along with withdrawing the increase in Electricity Duty of 94 paise for Survival of the Industry.

Hence keeping the above in view we humbly appeal to the Hon'ble Commission **NOT TO LEVY ANY DEMAND CHARGES FOR THE ENSUING TARIFF YEAR** and help recovery of the ailing Sector in the State.

2. <u>BILLING OF MINIMUM ENERGY ON DEMAND RECORDED</u>:

This is regarding the Specific Condition stipulated by the APERC vide its RST Order passed for FY 2023-24. Such condition at page no. 212 is applicable in respect of the HT - Energy Intensive Industries consumers. It stipulates that energy charges will be billed based on actual energy consumption or 50 kVAh/kVA/month **of contracted demand**, whichever is higher.

As stated in the opening paras, the Ferro Alloy industries in AP are facing very tough times and some industries in this category have already closed down / operating at low loads. There would be certain occasions during FY 2024-25 as well wherein some industries from this sector may have to be closed down or may have to be operated at low loads during part of the year. Under such circumstances such Ferro alloy industries will be liable to pay the energy charge corresponding to the minimum energy consumption of 50 kVAh/kVA/month as stated herein above. This condition is also proposed by the APDISCOMs to be continued during FY 2024-25.

In this regard, it would be prudent to state that a similar condition also prevails in the State of Telangana, which was carved out of the then combined state of Andhra Pradesh. As per clause no. 10.29.5 of the RST Order passed by the TSERC for FY 2023-24, the energy charges will be billed based on actual energy consumption or 50 kVAh/kVA/month **OF BILLING DEMAND**, whichever is higher. Such condition stipulated by the TSERC appears quite transparent and practical.

You are therefore requested to please stipulate a similar condition for HT Energy Intensive Industries in the RST Order to be passed for FY 2024-25 by incorporating the condition that the energy charges will be billed based on actual energy consumption or 50 kVAh/kVA/month **OF BILLING DEMAND**, whichever is higher and oblige us.

3. **<u>CERTAINTY OF TARIFF</u>**:

We would like to bring to the notice of this Hon'ble Commission that in the recent past i.e. during the years 2012-13, the then FSA (Fuel Surcharge Adjustment) had been repealed by APERC in view of the widespread damage caused to several Industries in the State because of the Levy of cumulative FSAs of past leading to closure of number of units. After such Repealing, Annual True up was adopted in place of quarterly FSA much to the relief of Consumers of all categories. This improved the Certainty and Visibility of the Tariff for the year and provided the much needed 'Ease of Doing Business' as intended by Electricity Reforms. However in the name of delay in realizations and thereby the carrying costs suffered by DISCOMs, FPPCA was brought in again much to the discomfiture of the Consumers. Once again, simultaneous levy of several FPPCAs, True ups of high magnitude has again landed the Consumers in misery owing to successive Tariff Shocks much against the intent of the Electricity Act.

In line with the Government's policy for supply of power 24x365 discoms are procuring the power at available rate in the market to meet the consumer meets. However, the high cost of power is being passed on to the consumers in the form of FPPCA and Ferro Alloys Sector is not in a position to absorb this high cost as all the orders of this sector from consumers is at a fixed price. Hence, there is no scope to absorb this additional burden. This sector requires certainty in tariff without any hike. Keeping the above in view, we suggest:-

1. As Ferro Alloys Sector is not in a position to absorb any additional burden on power tariff as the power component constitutes 35-75% of variable cost the industry is ready to reduce their loads based on prior intimation thereby reducing their production. We are fully aware there is no such mechanism available as on date and we humbly request to

Hon'ble Commission to evolve a mechanism so that the industry operates at a visible tariff and do not bleed their working capital by paying true up/FPPCA charges.

Alternatively,

2. We humbly appeal to this Hon'ble Commission to review the harsh FPPCA mechanism by limiting all kinds of Charges like FPPCA and True ups of all kinds to 10% of the Energy Charges throughout the year and balance to be made a part of ARR to become a part of ensuing year's Tariff so that there is Certainty in Tariff to ensure visibility of costs in the interest of Natural Justice and Ease of Doing Business.

4. **REQUEST FOR RECOMMENDATION TO REDUCE ELECTRICITY DUTY**:

To further reduce the burden of the Industrial Consumers in this hour of transition, we request Hon'ble Commission to kindly advise the Government of Andhra Pradesh to continue the exemption from Increase in Electricity Duty of 94 paise for the ensuing years also keeping its Energy Intensive and Price Sensitive nature.

5. **DE-RATION/RE-RATION OF CMD**:

Reduction of notice period from 30 days to 7 days for de-ration will help the Industry run efficiently. At present as per GTCS conditions 30 days notice is required for de-ration and for re-ration proposal has to go to the Transco and their approval is required for re-ration. As Ferro Alloys market is most volatile, we request a suitable mechanism may please be developed for this Industry either for de-ration or re-ration in one week time so that Industry need not pay demand charges when the plant is stopped and when the circumstances are favourable, the Industry can operate continuously. In case our request for withdrawal of demand charges is considered, this request need not be considered.

6. **GREEN ENERGY OPEN ACCESS**:

The World is facing extreme climate events in view of increased Greenhouse Gases and the Heads of Nations have made several International Commitments towards mitigation of Climate Change and Adoption of Renewable Energy is one of them. In line with this Central Government has launched 'Green Energy Open Access ' and this Hon'ble Commission also has published the Draft ' Green Energy Open Access , Charges and Banking Regulations-2023'. As the window period for ISTS charges waiver is time bound, we request Hon'ble Commission to kindly adopt this Regulation expeditiously in the spirit of Promotion of Renewable Energy and to give a Fillip to Make in India Program without insisting on the ceiling limit of 30% of DISCOM consumption for Banking. This would go a long way in not only providing Power to the Industries but also help in decarbonizing Manufacturing so that we can be globally competitive in face of implementation of 'Carbon Tax' by several Countries.

Finally, the Association is only looking for a fixed tariff for a period of one year so that the Industry can take a decision whether TO RUN the Industry or NOT.

With this uncertain demands like FPPCA & True Up charges industry will bleed and this gives raise to Industry becoming NPA. The Industry at present is bleeding heavily and Plants are getting closed. If the above steps are implemented this will help the Industry to restart and revive their operations.

In Conclusion, We pray Hon'ble Commission to kindly,

1. Withdraw the proposed Demand Charges to Energy Intensive Category specifically for Ferro Alloys
2. Minimum Energy Charges may be collected on Billing Demand (80% of Contracted Demand) and not on Contracted Demand as existing.
3. To evolve a suitable mechanism to inform industry in advance for reduction loads so that the industry do not avail high cost power or restrict the FPPCA and True up Charges to a maximum of 10% of Energy Charges per month.
4. Advise Government of Andhra Pradesh to continue to exempt levy of increased Electricity Duty of 94 paise for coming years also.
5. Request for reduction of de-ration/re-ration period
6. Adopt Green Energy Open Access, Charges and Banking Regulations-2023 expeditiously as requested.

We also request that the Association may be given time for personal hearing and also to make further submissions

Thanking You.

Yours Sincerely,

For AP Ferro Alloy Producer's Association

Authorized Signatory

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

BEFORE THE HONOURABLE ANDHRA PRADESH ELECTRICITY REGULATORY COMMISSION
AT ITS OFFICE AT 4th 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 2024-25 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 Central POWER Distribution Company of Andhra Pradesh Limited ('APCPDCL' or 'the Company' or 'the Licensee') as the Distribution and Retail Supply Licensee.

In the matter of
Central Power Distribution Company Limited OF ANDHRA PRADESH

Between:
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And
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Views / Objections / Suggestions:

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It may be seen that while the HT Industry – General consumers would operate at average LF of just 43.87%, the HT Energy Intensive Industry category consumers would operate their units at a very large average LF of 87.23%.

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Hence keeping the above in view we humbly appeal to the Hon'ble Commission **NOT TO LEVY ANY DEMAND CHARGES FOR THE ENSUING TARIFF YEAR** and help recovery of the ailing Sector in the State.

2. BILLING OF MINIMUM ENERGY ON DEMAND RECORDED:

This is regarding the Specific Condition stipulated by the APERC vide its RST Order passed for FY 2023-24. Such condition at page no. 212 is applicable in respect of the HT - Energy Intensive Industries consumers. It stipulates that energy charges will be billed based on actual energy consumption or 50 kVAh/kVA/month **of contracted demand**, whichever is higher.

As stated in the opening paras, the Ferro Alloy industries in AP are facing very tough times and some industries in this category have already closed down / operating at low loads. There would be certain occasions during FY 2024-25 as well wherein some industries from this sector may have to be closed down or may have to be operated at low loads during part of the year. Under such circumstances such Ferro alloy industries will be liable to pay the energy charge corresponding to the minimum energy consumption of 50 kVAh/kVA/month as stated herein above. This condition is also proposed by the APDISCOMs to be continued during FY 2024-25.

In this regard, it would be prudent to state that a similar condition also prevails in the State of Telangana, which was carved out of the then combined state of Andhra Pradesh. As per clause no. 10.29.5 of the RST Order passed by the TSERC for FY 2023-24, the energy charges will be billed based on actual energy consumption or 50 kVAh/kVA/month **OF BILLING DEMAND**, whichever is higher. Such condition stipulated by the TSERC appears quite transparent and practical.

You are therefore requested to please stipulate a similar condition for HT Energy Intensive Industries in the RST Order to be passed for FY 2024-25 by incorporating the condition that the energy charges will be billed based on actual energy consumption or 50 kVAh/kVA/month **OF BILLING DEMAND**, whichever is higher and oblige us.

3. **CERTAINTY OF TARIFF**:

We would like to bring to the notice of this Hon'ble Commission that in the recent past i.e. during the years 2012-13, the then FSA (Fuel Surcharge Adjustment) had been repealed by APERC in view of the widespread damage caused to several Industries in the State because of the Levy of cumulative FSAs of past leading to closure of number of units. After such Repealing, Annual True up was adopted in place of quarterly FSA much to the relief of Consumers of all categories. This improved the Certainty and Visibility of the Tariff for the year and provided the much needed 'Ease of Doing Business' as intended by Electricity Reforms. However in the name of delay in realizations and thereby the carrying costs suffered by DISCOMs, FPPCA was brought in again much to the discomfiture of the Consumers. Once again, simultaneous levy of several FPPCAs, True ups of high magnitude has again landed the Consumers in misery owing to successive Tariff Shocks much against the intent of the Electricity Act.

In line with the Government's policy for supply of power 24x365 discoms are procuring the power at available rate in the market to meet the consumer meets. However, the high cost of power is being passed on to the consumers in the form of FPPCA and Ferro Alloys Sector is not in a position to absorb this high cost as all the orders of this sector from consumers is at a fixed price. Hence, there is no scope to absorb this additional burden. This sector requires certainty in tariff without any hike. Keeping the above in view, we suggest:-

1. As Ferro Alloys Sector is not in a position to absorb any additional burden on power tariff as the power component constitutes 35-75% of variable cost the industry is ready to reduce their loads based on prior intimation thereby reducing their production. We are fully aware there is no such mechanism available as on date and we humbly request to

Hon'ble Commission to evolve a mechanism so that the industry operates at a visible tariff and do not bleed their working capital by paying true up/FPPCA charges.

Alternatively,

2. We humbly appeal to this Hon'ble Commission to review the harsh FPPCA mechanism by limiting all kinds of Charges like FPPCA and True ups of all kinds to 10% of the Energy Charges throughout the year and balance to be made a part of ARR to become a part of ensuing year's Tariff so that there is Certainty in Tariff to ensure visibility of costs in the interest of Natural Justice and Ease of Doing Business.

4.**REQUEST FOR RECOMMENDATION TO REDUCE ELECTRICITY DUTY**:

To further reduce the burden of the Industrial Consumers in this hour of transition, we request Hon'ble Commission to kindly advise the Government of Andhra Pradesh to continue the exemption from Increase in Electricity Duty of 94 paise for the ensuing years also keeping its Energy Intensive and Price Sensitive nature.

5.**DE-RATION/RE-RATION OF CMD**:

Reduction of notice period from 30 days to 7 days for de-ration will help the Industry run efficiently. At present as per GTCS conditions 30 days notice is required for de-ration and for re-ration proposal has to go to the Transco and their approval is required for re-ration. As Ferro Alloys market is most volatile, we request a suitable mechanism may please be developed for this Industry either for de-ration or re-ration in one week time so that Industry need not pay demand charges when the plant is stopped and when the circumstances are favourable, the Industry can operate continuously. In case our request for withdrawal of demand charges is considered, this request need not be considered.

6. **GREEN ENERGY OPEN ACCESS**:

The World is facing extreme climate events in view of increased Greenhouse Gases and the Heads of Nations have made several International Commitments towards mitigation of Climate Change and Adoption of Renewable Energy is one of them. In line with this Central Government has launched 'Green Energy Open Access ' and this Hon'ble Commission also has published the Draft ' Green Energy Open Access , Charges and Banking Regulations-2023'. As the window period for ISTS charges waiver is time bound, we request Hon'ble Commission to kindly adopt this Regulation expeditiously in the spirit of Promotion of Renewable Energy and to give a Fillip to Make in India Program without insisting on the ceiling limit of 30% of DISCOM consumption for Banking. This would go a long way in not only providing Power to the Industries but also help in decarbonizing Manufacturing so that we can be globally competitive in face of implementation of 'Carbon Tax' by several Countries.

Finally, the Association is only looking for a fixed tariff for a period of one year so that the Industry can take a decision whether TO RUN the Industry or NOT.

With this uncertain demands like FPPCA & True Up charges industry will bleed and this gives raise to Industry becoming NPA. The Industry at present is bleeding heavily and Plants are getting closed. If the above steps are implemented this will help the Industry to restart and revive their operations.

In Conclusion, We pray Hon'ble Commission to kindly,

1. Withdraw the proposed Demand Charges to Energy Intensive Category specifically for Ferro Alloys
2. Minimum Energy Charges may be collected on Billing Demand (80% of Contracted Demand) and not on Contracted Demand as existing.
3. To evolve a suitable mechanism to inform industry in advance for reduction loads so that the industry do not avail high cost power or restrict the FPPCA and True up Charges to a maximum of 10% of Energy Charges per month.
4. Advise Government of Andhra Pradesh to continue to exempt levy of increased Electricity Duty of 94 paise for coming years also.
5. Request for reduction of de-ration/re-ration period
6. Adopt Green Energy Open Access, Charges and Banking Regulations-2023 expeditiously as requested.

We also request that the Association may be given time for personal hearing and also to make further submissions

Thanking You.

Yours Sincerely,

For AP Ferro Alloy Producer's Association

Authorized Signatory

CC: - 1) Copy of WBERC Tariff Regulations, 2011
2) Copy of the RST order passed by the TSERC for FY 2023-24

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