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दक्षिण मध्य रेलवे SOUTH CENTRAL RAILWAY		
		प्रधान कार्यालय / Headquarters Office, विद्युत विभाग / Electrical Department, चौ.मं., सी ब्लॉक / 4 th Floor, 'C' Block, रेल निलयम / Rail Nilayam सिकंदराबाद / Secunderabad - 500 025

No.E. 19/5/1/3/APERC/ Vol. XVI

Dt: 19.12.2018.

✓ **The Secretary,**

Andhra Pradesh Electricity Regulatory Commission,
D.No.11-4-660, 4th Floor,
Singareni Bhavan, Lakdi-ka-pool,
HYDERABAD-500 004.

Sub: Representation against to the proposed tariff for HT-V (Railway Traction) category on behalf of S.C, S.R, E.Co. & S.W Railways.

Ref: Public notice issued in the news paper Dated 19.11.2018.

AP DISCOMs have issued public notice in news paper on 29.11.2018 for the proposed retail supply tariff for the year 2019-20.

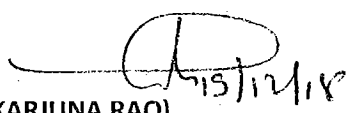
The representation against the proposed retail tariff of HT-V (Railway Traction) category on behalf of South Central, Southern, East Coast and South Western Railways is enclosed for kind consideration.

A copy of the representation has also been submitted to Chief General Manager (Planning, PPA & RA)/ APEPDCL and CGM (RAC)/ APSPDCL.

Apart from this representation, South Central Railway also requests to be heard in person during public hearing at Hyderabad.

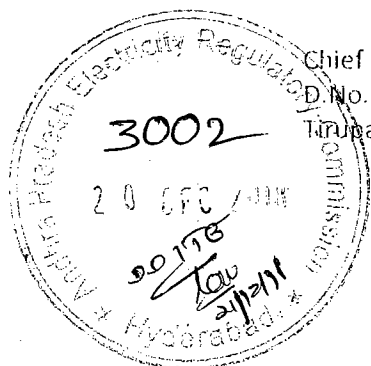
Kindly acknowledge receipt.

Encl- Copy of Representations for HT-V
Copy of acknowledgement


(G.V. MALLIKARJUNA RAO)
CHIEF ELECTRICAL DISTRIBUTION ENGINEER
SOUTH CENTRAL RAILWAY
SECUNDERABAD

C/- Chief General Manager (PPA RA & QC), APEPDCL,
P & T Colony, Seethammadara,
Visakhapatnam-530 013.

Chief General Manager (RAC), APSPDCL,
D.No. 19-13-65/A, Vidyut Nilayam, Srinivasapuram,
Tirumathi-517 503.



**THE OBJECTIONS ON THE PROPOSED TARIFF BY AP DISCOMS FOR
H.T. CATEGORY-V (RAILWAY TRACTION) FOR THE YEAR 2019-20
ON BEHALF OF SOUTH CENTRAL, SOUTHERN,
EAST COAST & SOUTH WESTERN RAILWAYS**

- 1.0** Railways serve the public at large and being a public utility, it should be supplied with electricity at a reasonable price which would reduce its requirement for diesel. In the process there would be saving of foreign exchange. It will also prevent upward revision of fares for transportation of passengers and goods by the Railways.
- 2.0** Indian Railway avails traction power through 46 TSSs at 220/ 132 KV (31 Traction sub-stations of SC Railway, 2 of Southern Railway and 11 of East Coast Railways & 2 of South Western Railways) in Andhra Pradesh. The total consumption of Railway traction is 1564 million units projected for the year 2018-19 and paying a substantial amount of Rs. 744 Crores to various DISCOMs in Andhra Pradesh.
- 3.0** The Railways are a bulk consumer and pay major revenues to DISCOMs. Hence, the grievances of Railways are to be considered while fixing the tariff for HT-V category.
- 4.0 Electrification of more sections in Andhra Pradesh :**
By way of electrification of Railway network in Andhra Pradesh additional infrastructure will be added, resulting into faster movement of goods and passenger traffic. Ultimately there is every possibility of upcoming industries in the area of coastal region and backward region like Rayalaseema in newly formed Andhra Pradesh. Electrification of Nallapadu – Guntakal, Guntakal- Mantralayam Road, Gooty – Dharmavaram - Yelahanka and Nallapadu - Nadikudi section works are already completed. Vijayawada - Machilipatnam - Gudiyada-Bhimavaram – Narsapur, Guntur – Tenali double line with

electrification,Obulavaripalli- Krishnapatnam section Guntakal – Bellary, Dhone - Kurnool sections and 3rd line from Visakhapatnam – Vijayawada - Chennai sections are under progress in AP state. By March 2019, Guntur – Tenali double line with electrification, Guntakal – Bellary will be commissioned with electrification. By 2020 entire South Central Railway in Andhra Pradesh state is planning to be electrified and works are under progress.

In view of new electrification works 10 more traction substations in Andhra Pradesh at Yadavalli, Guntakal, Sattenapalli, Gudivada, Bhimavaram, Tanuku, Pedana, Aduripalli, Cherilopalli and Komatipalli (E.Co.R) are going to be commissioned in 2018-19 and 2019-20 and further consumption will be increased.

5.0 Traction Tariff Proposed for 2019-20 :

Year	Demand Charges Rs/ KVA	Energy Charges Rs/ KVAh	Average unit cost Rs/KVAH	% Increase
2018-19 (Present)	300	3.55	4.74	Rs. 0.76 & 16%
2019-20 (Proposed)	390	3.95	5.50	

The increase in railway traction tariff of Rs. 0.76 /Unit (16%) is highly unreasonable and unjustified. It is understood that only HT-V category Railway traction tariff proposed to increase by 16% is unjustified.

Higher traction tariff slashes Rate of Return (ROR) for the new electrification projects and making them non- viable.

6.0 Off peak time loads for Railway Traction:

It is to mention that Railway traction is power intensive and loads are for passenger & goods train services which are run round the clock. There is no distinction of peak to non-peak hours. Thus Railways are improving base loads of DISCOMs and supporting the grid stability. Apart from this, Railways is maintaining higher power factor.

7.0 Railway option for open access for availing traction power supply.

- Due to discriminative policy of Discoms and over burden, Railways as a distribution licensee, planned to avail power through open access in Andhra Pradesh and Telangana states.
- It is brought to the notice of the Hon'ble commission; Indian Railways are already availing power through open access in various states/Railways. As a distribution licensee cross subsidy charges are also not applicable.
- In this circumstance, proposed tariff by AP Discoms equivalent charges of Rs 5.50 /KVAh (with average load factor 35%) is very high and unreasonable. Higher tariff comparatively open access tariff, over burden to Railways bulk consumer. The proposed higher tariff forcing Railway to go for open access to meet its consumption.

8.0 Request for Deletion of cross subsidy:

Hon'ble commission is requested, to exempt Railways from levy of cross subsidy surcharge being a deemed licensee on electricity purchased for its own consumption.


9.0 Conclusion:

Railway traction provides base load, maintained high power factor and save imported precious oil, apart from speedy, energy efficient and environmental friendly public transport.

Encouragement for new electrified sections for development of infrastructure in newly formed AP particularly and also act as growth engine for the economy of country largely.

Keeping the above in view, Hon'ble commission is requested to consider and it is prayed that,

- a) The tariff under category HT-V Railway traction is to be fixed reasonably by reducing further to encourage electrification projects in Andhra Pradesh.
- b) To give impetus to electrification of Railway network, a rebate of at least 10% of energy charges be allowed for a period of five years similar to Madhya Pradesh and Chattisgarh.
- c) Exempt Railways from cross subsidy surcharge considering Railways as deemed licensee


(G.V.MALLIKARJUNA RAO)
Chief Electrical Distribution Engineer
South Central Railway
Secunderabad.