

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL
SOUTHERN ZONE BENCH AT CHENNAI
APPEAL NO. 82 OF 2021**

IN THE MATTER OF:

MAHESH MAMINDLA AND ANR.

...APPELLANTS

VERSUS

STATE OF TELANGANA AND ORS.

...RESPONDENTS

ADDITIONAL AFFIDAVIT FILED ON BEHALF OF THE APPELLANTS

I, Mahesh Mamindla, S/o Yadagiri Mamindla, R/o H.No: 5-14, Mittapally, Village Siddipet Mandal, Telangana – 502375, do hereby solemnly affirm and declare on oath as under:

1. That I am conversant with the facts and circumstances of the case and competent to swear this Additional Affidavit.
2. That the deponent craves liberty to raise additional submissions or file additional affidavit in case need arises during the course of arguments.
3. That the above titled Appeal is pending adjudication before this Hon'ble Tribunal which was filed under Section 16(e) read with Section 20 of the National Green Tribunal Act, 2010 challenging the legality and correctness of the Stage-I Forest Clearance *vide* letter dated 7.12.2021 and the Working Permission dated 07.08.2021. That all the permissions were granted to Transmission Corporation of Telangana Limited (TRANSCO) for erection and installation of 400KV Overhead DC transmission lines from Kethireddipally 400 KV SS to 400 KV Rayadurg GIS along the Outer Ring Road CORR), Shamshabad Division, Telangana, and passing through forest area admeasuring 6.7075 ha.
4. That the following additional documents were not a part of the Appeal filed on 29.12.2021 on behalf of the Appellants. Thus, the Appellants produced such documents before this Hon'ble Tribunal on the date of hearing on 09.01.2023, where this Hon'ble Tribunal gave oral directions to the Appellants to file the copies of the maps and images which were




 ATTESTED
 s. Ravindra Prasad
 ADVOCATE & NOTARY
 H.No 11-9-265/III/F-3, SUNSHINE ESTATE
 AYAPURI COLONY, KOTHAPET, HYD. TELANGANA

M. Mahesh

produced by the Appellants at the time of hearing but are not placed on record before this Hon'ble Tribunal. Hence, the Appellant hereby is filing the copies of the relevant satellite maps and images which it wants to bring on record through the present Additional Affidavit for the perusal of this Hon'ble Tribunal which are necessary for proper adjudication of the above-mentioned Appeal.

i. The Project Proponent has not considered the Direct Route between the ORR and the Service Lane instead diverted into the Mrugavani National Park and erected quad towers within the forest area:

That it is pertinent to note that R2, TS TRANSCO *vide* letter dated 17.04.2021 states about 3 routes namely, Green Line (Original Route), Yellow Line (Alternate Route), Blue Line (Alternate Route). That the project proponent has erected the transmission lines in the Green Line out of the other three lines. However, Project Proponent has not taken the Direct Route between the ORR and the Service Lane, instead they have diverted into the Mrugavani National Park and erected Quad Towers. The Appellants submit that the approved route should have been the direct route and the forest diversion could have been avoided completely. In this regard, R2 has failed to give any justification as to why the Direct Route has not been considered and why such forest diversion was needed.

Copy of the satellite images taken by the Appellants showing the alternative routes in 'pink dotted lines' which has not been considered by TS TRANSCO are annexed herewith as **Annexure A/1.**

ii. Permissions were sought by the Project Proponent to erect Monopoles but in contrary Quad towers have been erected within the Mrugavani National Park:

- a. That the Project has been approved for the erection of monopoles but in contrary to the permissions sought, Quad towers have been erected in the diverted land. That no prior approval has been obtained as well as no detailed justifications have been



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provided by R-2, TS TRANSCO that what necessitates to erect Quad Towers when permissions were sought for erecting monopoles. In this regard it is pertinent to note that Monopoles require much lesser right of way whereas quad poles require much higher right of way for erection. Furthermore, the documents filed by Respondent No. 2, TS TRANSCO on 18.07.2022 in the I.A. No. 81 of 2022 filed by the Appellants have specifically admitted the same and stated:

"400kV Monopoles are being used for the first time in the HMDA and OR areas where the availability of corridor is limited as base width of is around 2.5 to 3 meters. Monopoles require very less space compared to the Conventional Towers of width is around 12 to 25 meters."

That despite admitting the fact that erection of monopoles require just 2.5 to 3 meters of space yet TS TRANSCO has purposely with a malafide intention diverted into the Mrugavani National Park and erected quad towers which require 12 to 25 meters of space thereby felling larger number of trees and has not considered to erect the poles in the ORR only without deviating into the Mrugavani National Park.

Copy of the images taken by the Appellants showing Quad towers are erected inside the Mrugavani National Park are annexed herewith as

Annexure A/2.

b. It is pertinent to note that the Telangana Gazette Notification No. 71 vide dated 05.05.2018, in Para 3 has categorically bifurcated the 43km DV Line to be erected as:

"400kV DC Line from Proposed Rayadurg SS to Kethireddypally SS -43 KM:

- ***400kV Twin HTLS DC line on Quad Conventional Towers from Kethiredypally SS to AP-41—29 KMS.***
- ***400kV Twin HTLS DC line on Monopoles from AP-41 to AP-75 (ORR Junction) —11 KM.***



M. Mahesh

- 400kV XLPE UG Cable from AP-75 (ORR Junction) to proposed 400kV GIS Rayadurg—3 KM."

That the Notification clearly states that Monopoles to be erected from AP-41 to AP-75 (ORR Junction) which is the Mruguvani National Park. However, TS TRANSCO in reality has erected Quad Towers from AP-41 to AP-75 (ORR Junction) in complete violation of the Notification No. 71 without giving any prior and valid justification.

Copy of the Telangana Gazette Notification No. 71 dated 05.05.2018 is annexed herewith as **Annexure A/3**.

5. That the abovementioned documents are filed in compliance to the directions by this Hon'ble Tribunal in the above captioned matter and hence are necessary for proper adjudication of the matter. It is submitted that no prejudice will be caused to the Respondents if these documents are placed on record. It is therefore most respectfully submitted that the Appeal may be allowed in the interest of justice.


DEPONENT

VERIFICATION

Verified on this 25th day of February, 2023 at Hyderabad that the contents of the above-mentioned Additional Affidavit are true and correct to my knowledge and no part of it is false and nothing material has been concealed therefrom.

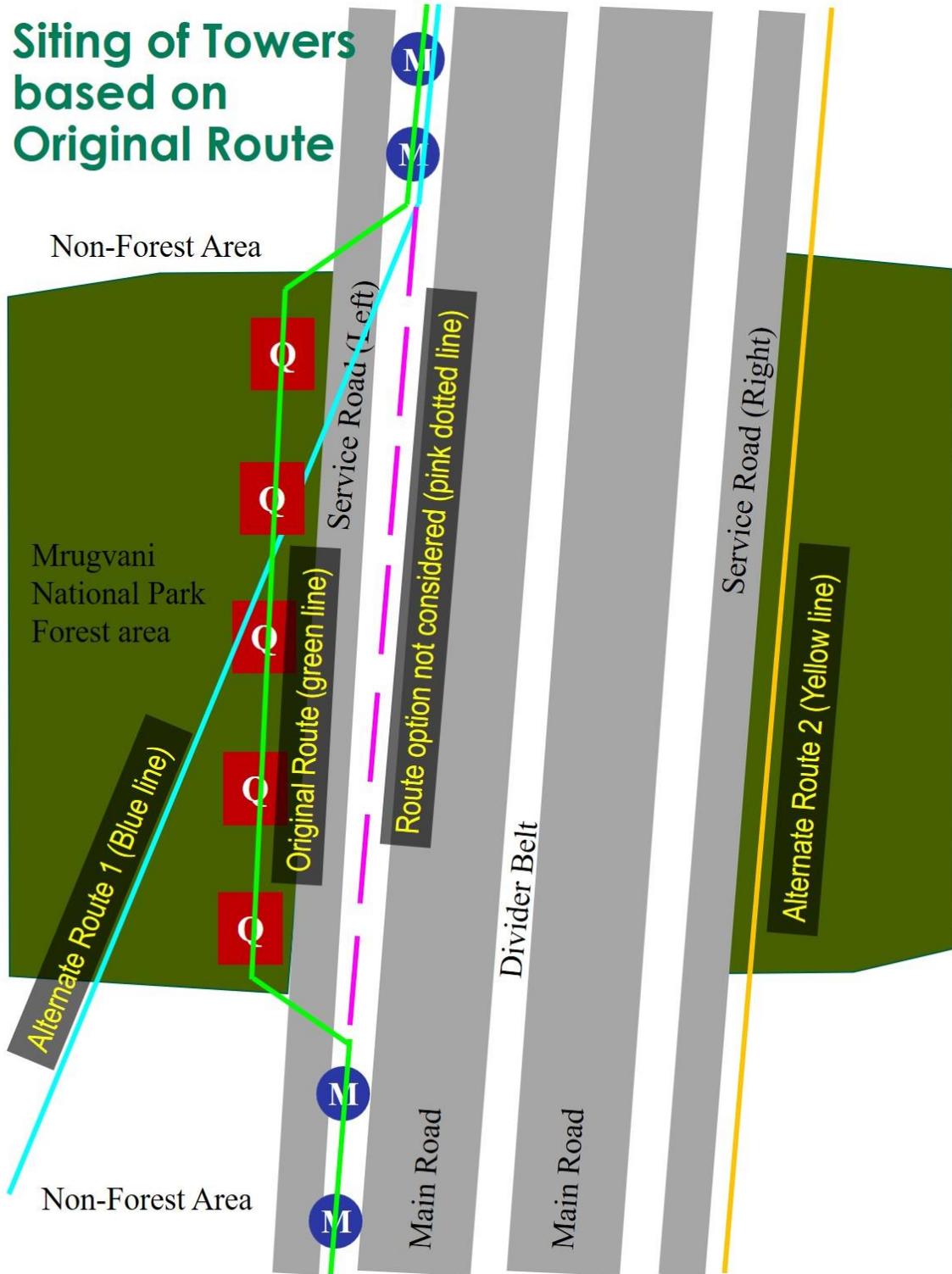

DEPONENT

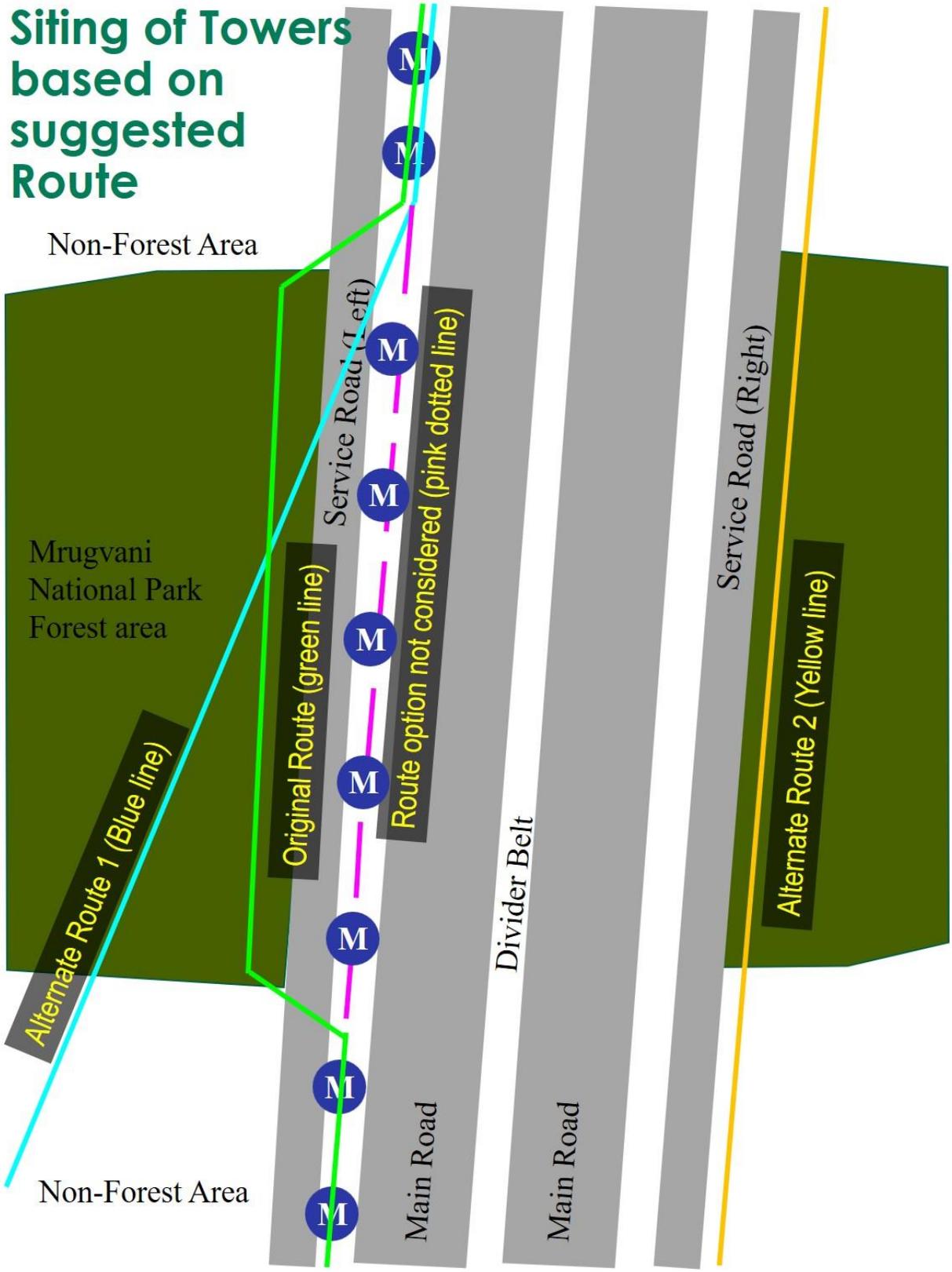



ATTESTED

s. Ravindra Prasad Yu.
ADVOCATE & NOTARY
H.No 11-9-265/II/F-3, SUNSHINE ESTATES,
TJAYAPURI COLONY, KOTHAPET, HYD, TS-5001
Ph: 7036892567 707514

COPY OF THE SATELLITE IMAGES TAKEN BY THE APPELLANTS SHOWING THE ALTERNATIVE ROUTES IN 'PINK DOTTED LINES' WHICH HAS NOT BEEN CONSIDERED BY TS TRANSCO.

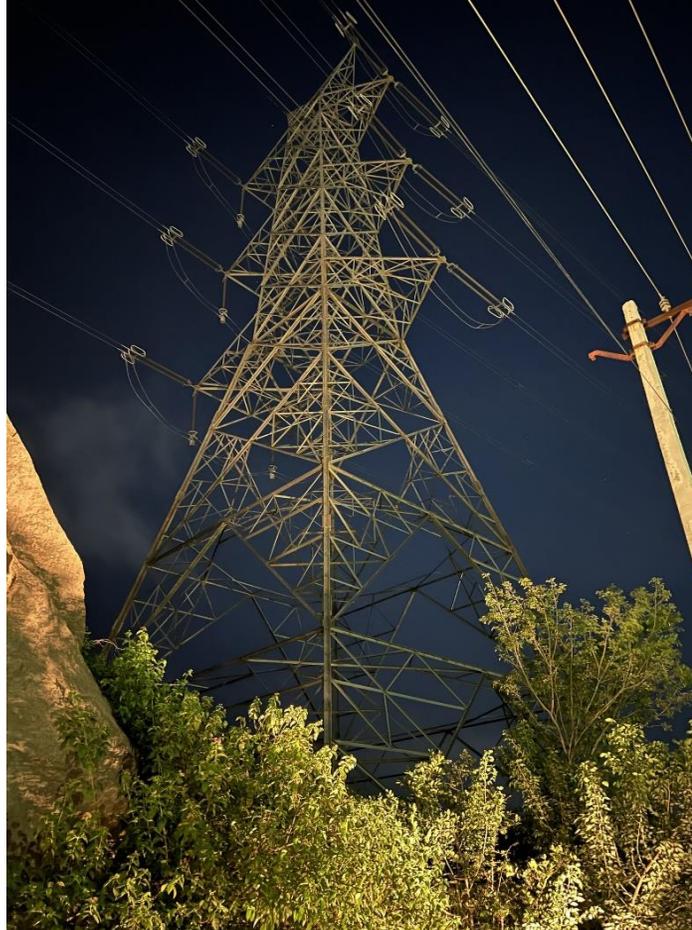






ANNEXURE A/2

COPY OF THE IMAGES TAKEN BY THE APPELLANTS SHOWING QUAD TOWERS ARE ERECTED INSIDE THE MRUGAVANI NATIONAL PARK AND MONOPOLES ERECTED IN THE OUTER RING ROAD.



R.N.I.No. TELMUL/2016/73158.
HSE No.1051/2017-19.



[Price : ₹. 5-00.]



తెలంగాణ రాజ పత్రము THE TELANGANA GAZETTE

PART-II EXTRAORDINARY
PUBLISHED BY AUTHORITY

No. 71]

HYDERABAD, SATURDAY, MAY 5, 2018.

NOTIFICATIONS BY HEADS OF DEPARTMENTS, Etc.

—x—

PUBLIC WORKS NOTIFICATIONS

TRANSMISSION CORPORATION OF TELANGANA LIMITED

NOTIFICATION

Lr.No.CE/400kv/SE.PM-I/DE-1/ADE2/F. GAZETTE/D.No.73/2018.- Transmission Corporation of Telangana Limited proposes the following Power Evacuation, System Improvement and Lift Irrigation Schemes for the year 2018-2021 with the erection of the Transmission Lines, Substations and Bay extensions. The Schemes are proposed for reduction of EHT transmission losses, improvement of voltage profiles & to meet the additional load demand in the Telangana region.

1. **SITA RAMA LIFT IRRIGATION SCHEME**

(T.O.O.(ED-LIS) Ms.No.1, Dt:03.01.2018)

- i. Erection of LILO of one circuit of 220 KV KTPS V-Lower Sileru-II Line to proposed Pump House at B.G. Kothur-20 kM
- ii. Erection of LILO of one circuit of 220 KV KTPS-Manuguru Line to proposed Pump House at B.G. Kothur-1 kM
- iii. Erection of 220/11kV Substation at B.G. Kothur
- iv. Erection of 220 kV TMDC Line from 400/220/11 kV Kamalapuram SS to 220/11 kV V.K.Ramavaram SS-25 KM
- v. Erection of 220/11kV Substation at V.K.Ramavaram
- vi. 400 KV TMDC Line from 400/220 KV Julurupadu SS to 400/220/11 KV Kamalapuram SS-50 KM
- vii. Erection of 400/220/11kV LIS SS at Kamalapuram
- viii. Erection of 2 Nos 400kV Quad Moose Bays at 400/220 KV Julurupadu SS

2. **PALAMURU-RANGAREDDY LIFT IRRIGATION SCHEME**

(T.O.O.(CE-PROJECTS-II) MS.NO.11, DT:09.05.2017)

- i. 400kV QMDC line from proposed 400/11kV Yedula SS to 400/11kV Narlapur SS-30kM
- ii. Erection of 400/11kV SS at Narlapur

[1]

- iii. 400kV QMDC line from 400/220kV Maheshwaram SS to 400/11 kV Yedula SS - 130 kM
- iv. 400kV QMDC line from 400/220kV Veltoor SS to 400/11 kV Yedula SS-50 kM
- v. Erection of 2 Nos 400kV Quad Moose bays at Veltoor SS for Yedula feeders
- vi. Erection of 2 Nos 400kV Quad Moose bays at Maheshwaram SS for Yedula feeders
- vii. Erection of 400/11kV SS at Yedula
- viii. 400kV QMDC line from proposed 400/11kV Yedula SS to 400/11 Vatttem SS -60kM
- ix. 400kV QMDC line from proposed 400/11kV Vatttem SS to 400/11 Uddandapur SS -60kM
- x. Erection of 400/11kV SS at Vatttem
- xi. LILO of both circuits of 400kV Suryapet-Shankerpally QMDC Line to 400/11kV Uddandapur SS-50kM
- xii. Erection of 400/11kV SS at Uddandapur
- xiii. 220 kV TMDC line from 220kV Parigi SS to 220/11kV Laxmidevipally SS- 10kM
- xiv. Erection of 2 Nos 220kV Twin Moose bays at 220kV Parigi SS for Laxmidevipally feeders
- xv. Erection of 220/11kV SS at Laxmidevipally

3. RAYADURG SYSTEM IMPROVEMENT SCHEME

(T.O.O.(CE-400kV) Ms.No.79, Dt: 13.04.2018)

- i. 400/220/132KV GIS Substation at Rayadurg - 2x500+2x160 MVA
- ii. 400kV DC Line from Proposed Rayadurg SS to Kethireddypally SS -43 kM
 - a) 400kV Twin HTLS DC line on Quad Conventional Towers from Kethiredypally SS to AP-41—29 kMS
 - b) 400kV Twin HTLS DC line on Monopoles from AP-41 to AP-75 (ORR Junction) —11 kM
 - c) 400kV XLPE UG Cable from AP-75 (ORR Junction) to proposed 400kV GIS Rayadurg—3 kM
- iii. 2 Nos. 400kV Quad Bay Extensions at 400/220/132kV Kethireddypally SS
- iv. LILO of 220kV Gachibowli – Shivarampally line to proposed Rayadurg SS - UG cable-4.5 kM
- v. LILO of 220kV Gachibowli – Shapur Nagar Line to proposed Rayadurg SS - UG cable – 5 kM
- vi. LILO of 220kV Gachibowli – Miyapur Line to proposed Rayadurg SS – UG cable- 6.5 kM
- vii. LILO of 220kV Gachibowli – Erragadda Line to proposed Rayadurg SS - UG cable – 5 kM
- viii. 132kV DC line from proposed Rayadurg GIS to 132kV Madhapur SS - UG cable- 3.2 kM and 132kV Bay extensions at 132kV Madhapur SS
- ix. 132kV DC line from proposed Rayadurg GIS to 132kV Jubilee Hills SS - UG cable – 7 kM and 132kV Bay extensions at 132kV Jubilee Hills SS
- x. LILO of 132kV Erragadda – Shivarampally SS SC line to proposed Rayadurg SS - UG cable- 3.5 kM

4. NIRMAL POWER TRANSMISSION SCHEME

(T.O.O. (CE-400kV) Ms.No.07Dated: 09.01.2018)

- i. 400/220kV SS at Nirmal with 3x315 MVA.
- ii. 400kV Quad moose DC line from STPP,Jaipur to the 400/220kV Nirmal SS–145 kM.
- iii. Up gradation of 132/33 kV Renzal SS to 220/132 kV Renzal Sub Station with 2x100MVA
- iv. 220/132kV Sub-Station with 2 x 100 MVA PTR capacity at Indravelly in Adilabad District
- v. 220kV Multi circuit line for making LILO of existing 220kV RSS(Malyalpalli) –Nirmal and RSS-Vemnur-Nirmal DC line to existing 220/132kV Jagityal SS —3Kms
- vi. 220kV DC Line from 400/220kV Nirmal SS to 220kV Nirmal SS on Multi circuit towers -5 Kms

- vii. 220kV DC Line from 400/220kV Nirmal SS to the proposed up graded 220/132 kV Renzal SS - 68KM
- viii. 220kV DC Line from 400/220kV Nirmal SS to the proposed 220/132 kV Indravelly SS - 110KM
- ix. 220kV Bay Extensions at Jagityal 220kV SS- 4 Nos.
- x. 132kV DC Line from Proposed 220/132 kV Indravelly SS to 132/33 kV Utnoor SS - 15KM
- xi. DC line with Single Moose from proposed 220/132 kV Indravelly SS to 132/33 kV Asifabad SS on 220kV Galvanized DC towers – 74KM
- xii. 132kV LILO line to the proposed 220/132kV SS Indravelly from Loc No.211 (R+3) of existing 132kV Ichoda – Adilabad Line– 40KM
- xiii. 132kV DC line from Proposed 220/132 kV Indravelly SS to the existing 132kV Adilabad SS-67KM
- xiv. 132kV Bay Extensions at Utnoor SS-2Nos, Asifabad SS -2Nos and at Adilabad SS–2Nos

5. KTPS VII STAGE (1 X 800 MW) POWER TRANSMISSION SCHEME:

(T.O.O. (CE-400KV) MS.NO. 139, DT: 11.09.2017)

- i. 400/220kV Sub-Station at Jangaon, with 3 x 500MVA.
- ii. 400kV QMDC Line from KTPS Stage – VII Switchyard to 400/220kV Julurupadu SS – 39 kms.
- iii. 400kV Quad Moose DC line from 400/220kV Julurupadu SS to 400/220kV Jangaon Sub-Station - 170kms.
- iv. 400kV Quad Moose DC line from 400/220kV Jangaon Sub-Station to proposed 400kV Tippapur LI SS – 70 kms.
- v. 400kV Quad Bay Extensions at 400/220kV Julurupadu SS - 2 Nos.
- vi. 400 kV Quad Bay Extensions at 400kV Tippapur LI Sub Station - 2 Nos.
 - i Up gradation of 132/33kV Jangaon Sub Station to 220/132/33kV Jangaon Sub Station with 2x100 MVA.
 - ii. 220/132/33kV Sub-Station at Husnabad with 2 x 100MVA and 2x50 MVA
- iii. 220kV line with Multi circuit towers for making LILO of 220kV Waddekothapally-Bhongiri DC line (both circuits) to 400kV Jangaon SS – 26KM
- iv. 220kV DC line for making LILO of 220kV KTPS-Shahpurnagar SC line to 400kV Jangaon SS - 8.5KM
- v. LILO of 220kV KTPS-Shahpurnagar SC line to 220/132kV SS Waddekothapally-24KM
- vii. 220kV DC line from 400/220kV Jangaon SS to the proposed 220/132/33kV Husnabad SS -60KM
- viii. 220kV DC line from 400/220kV Jangaon SS to the proposed up graded 220/132/33 kV Jangaon SS -15KM
- ix. 220kV Bay Extensions at 400/220kV Jangaon SS – 6 Nos & at W.K.Pally SS -2Nos.
- x. 2nd circuit stringing on existing 132kV DC/SC Husnabad-Palamaukula line-35KM.
- xi. 132kV line with Multi circuit towers for making LILO of both ckts of 132kV Husnabad-Palamakula DC line to proposed 220/132/33kV Husnabad SS-2KM
- xii. 132 kV Bay Extensions at Husnabad SS and at Palamakula SS-2Nos.

6. 765kV Wardha - Hyderabad Link Transmission Scheme:

(T.O.O.(CE-400kV) Ms.No.105, Dt:15.07.2017)

- i. 400/220kV Maheshwaram Substation with 2x500MVA
- ii. 400kV Quad Moose DC Line from Maheshwaram 400/220kV Substation - Maheshwaram 765/400kV (PGCIL) SS – 1.5KM
- iii. 400kV Twin Moose DC Line from Maheshwaram SS –Shankarpally SS – 6.5KM
- iv. Bay extensions at Maheshwaram 765/400kV (PGCIL) SS – 2Nos.
- v. Erection of 400/220/132kV SS at Kethireddypalli with 2x315+2x100MVA.
- vi. LILO of both circuits of Shankarpally -Suryapeta QMDC Line to Kethireddypalli SS – 25KM
- vii. 400kV QMDC line from 400kV Dichpally SS to 400kV Nirmal SS – 60KM

- viii. LILO of both circuits of 400kV TMDC line from Dindi-Mamidipally to 400kV Maheshwaram SS on Multi circuit towers – 4.5KM
- ix. 400kV Quad Bay extensions at 400kV Dichpally SS – 2Nos.
- x. 400kV Quad Bay extensions at 400kV Maheshwaram SS – 4Nos.
- xi. LILO of both circuits of 220kV Dindi- Bongulur line to Maheshwaram SS on 220kV Multi-Circuit Towers – 10KM
 - i. 220kV features at existing 132/33kV Madgula Sub Station with 2x100MVA
 - ii. LILO of both circuits of 220kV Dindi- Bongulur at Proposed 220kV Madgula SS on Multi Circuit Towers – 4KM
- xiv. 220kV DC line from 400/220kV Maheshwaram SS to 220kV Fabcity SS – 26KM (4km on Multi Circuit Towers).
- xv. Erection of 220kV Bays at 220/132kV Sub-station at Fabcity – 2Nos.
- xvi. Erection of 220/132/33 kV SS at Kothur – 2x160+2x80MVA
- xvii. LILO of one ckt of 220kV Mamidipally – Shadnagar Line at Proposed Kothur 220kV SS - 3KM.
- xviii. LILO of one ckt of 220kV Shamshabad - 400kV Kethireddypalli SS line at Proposed Kothur 220kV SS - 13KM.
- xix. LILO of both ckt of 220kV Shamshabad – Yeddumailaram line and both ckts of 220kV Shadnagar - Shankarpally line to 400kV Kethireddypalli SS on 220kV Narrow Based Multi-Circuit Towers – 3 KM
- xx. Erection of 132/33kV SS at Kanakamamidi with 2x80MVA
- xxi. 220kV DC line from 400kV Kethireddypalli SS to 132/33kV Kanakamamidi SS on 220kV Narrow Based Multi Circuit Towers – 5KM
- xxii. 220/132kV Sub-Station at Banswada – 2x100MVA
- xxiii. 220kV DC line from 400/220kV SS Dichpally to 220/132kV SS Banswada – 60KM
- xxiv. Erection of 220kV Bays at 400/220kV Dichpally Sub-station – 4Nos.
- xxv. 220kV TMDC line from 400kV Dichpally SS to 220kV Dichpally SS – 5KM
- xxvi. 220kV Bays at 220kV Dichpally SS – 2Nos.

In exercise of powers conferred under Section 164 of the Electricity Act 2003, Central Act No.36 of 2003, the Government of Telangana hereby confers upon Transmission Corporation of Telangana Limited, the Transmission Supply licensee in the State of Telangana and Northern Power Distribution Company of Telangana Limited and Southern Power Distribution Company of Telangana Limited or their authorized representatives to have the power for placing of the electric supply lines or electric plant for the transmission of electricity or for the purpose of telephonic or telegraphic communications necessary for the proper co-ordination of works, that a telegraphic authority possesses under the provision of the Indian Telegraphic Act 1885 (Central Act 13 of 1885).

Any person interested/aggrieved may make representation to the Chief Engineer/ 400kV, TSTRANSCO, Vidyut Soudha, Khairatabad, Hyderabad – 500 082 within two (2) months from the date of publication of this notification.

Representations received after the due date will not be considered and TSTRANSCO will take-up the above works after due date with/without modification as it deems fit after making enquiry, if necessary.

Hyderabad,
24-04-2018.

(Sd/-),
CHIEF ENGINEER/400kV.