

**HIGH COURT FOR THE STATE OF TELANGANA**

**MAIN CASE No:            ITTA No.177 of 2025**

**PROCEEDINGS SHEET**

| Sl. No. | Date       | ORDER                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | OFFICE NOTE                                            |
|---------|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|
| 1.      | 27.10.2025 | <p><b><u>PSK,J &amp; SCR,J</u></b><br/>Counsel for the appellant            : Mr.Mr.M.V.Swaroop.<br/>Counsel for the respondent        : Mr.Sudhakar Reddy, Standing<br/>Counsel for the Income Tax Department.</p> <p style="text-align: center;"><b><u>ITTA No.177 of 2025</u></b></p> <p style="text-align: center;">The appeal is admitted on the following substantial questions of law:</p> <ol style="list-style-type: none"><li>1. Whether the Hon'ble ITAT was correct in law in relying on the later inclusion of "power generation" in Section 32(1)(ia) of the Income Tax Act, 1961, to infer its exclusion from Section 32AC of the said Act, instead of interpreting Section 32AC on its own terms and in light of its legislative object?</li><li>2. Whether the Hon'ble ITAT erred in law in ignoring the settled judicial position that "power generation" constitutes "manufacture" or "production" for the purpose of the Income Tax Act, 1961, while interpreting the scope of Section 32AC?</li></ol> <p style="text-align: center;">Mr.Sudhakar Reddy, learned Senior Standing Counsel for the Income Tax Department entered appearance on behalf of respondent. Hence issuance of notice stands dispensed with.</p> | Transferred to i/o folder, before corrections, if any. |

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|  |  | <p>Post this appeal for final hearing in usual course along with ITTA.No.135 of 2025.</p> <p style="text-align: right;"><u>PSK,J</u></p> <p style="text-align: right;"><u>SCR,J</u></p> <p><i>aqs</i></p> |  |
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