

Subject: Objections / Suggestions on DISCOMS filings as per public notice dated 11 Jan 2025 - Reg

Sub: Objections/Suggestions on TGSPDCL and TGNPDCL filings as per the public notice dated 11 Jan 2025- Reg

Dear Sir/Madam,

Going forward please furnish email ids of the respective offices also. This facilitates submission of objections on public notice.further.

DISCOMS incurring losses besides collecting unauthorized fixed charges, a contempt of the Tariff Order dated 23 Mar 2022, passed by the TGERC. The Commission disallowed DISCOMS' proposal of collecting fixed charges based on RMD at Clause 6.10, present in page 149, of the Tariff Order.

Both DISCOMS can reduce Admin & General expenses further. Both DISCOMS are spending on unnecessary legal costs. DISCOMS are challenging consumer favor orders of tiny amounts too. Eg., CG.No. 13/2024-25/suryapet circle.

Most of the time challenges are not voluntary filings. It is evident as DISCOMS challenging the orders only when consumers files Sec 142 or non compliance appeals. Most of the challenges are getting filed to save themselves from hefty non compliance of order penalties or disciplinary actions. Challenges are not in the interest of DISCOMS but in the interest of saving respective officers paychecks or sec 142 actions, a clear misuse of DISCOMS money for legal expenses for officers failures..

Both DISCOMS assurances of consumer service are turning false.

TGNPDCL assures about CGRFs as

"The 'Forum' is functioning independently and impartially even though it is an 'internal Forum' of the Licensee without allowing any scope for 'doubt' and pointing out the mistakes of the officers of the Licensee and settling all grievances concerning electricity."

"The decision of the Forum is final as far as the Licensee is concerned. However, the complainant may make a representation against the order of the Forum to the VIDYUTH OMBUDSMAN,"

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Both DISCOMS are not creating proper consumer / public awareness.

DISCOMS failed to implement/adopt Clause 16(4)(b) of Electricity (Rights of Consumer) Rules 2020 which reads as below

"The distribution licensee shall publish the guaranteed standards of performance along with compensation structure, information on procedure for filing of complaints,

in the bills for month of January and July. If it is not possible to publish the same at the back of the bills, the distribution licensee shall publish it on a separate hand out and distribute it along with the bills."

The consumer complaints reaching CGRFs and Vidyut Ombudsman is almost negligible when compared to DISCOMs consumer base. Not even one (1) appeal a week is filed at Ombudsman.

Lack of safety awareness initiations are resulting in fatal accidents and attracting compensations, this besides low or no expenditure on safety works.

TGNPDCL showed all the special appropriations values (21.01 cr) towards compensation for fatal accidents. They didn't spend any thing on employee safety aids, awareness and other consumer/ public related awareness programs.

TGSPDCL not utilized 14.75cr from approved 20cr.

TGSPDCL and TGNPDCL are not voluntarily compensating for breach of Guaranteed SOP timelines, though directed for automatic payments as per Clause 13 of Electricity (Rights of Consumer) Rules 2020 and as per Clause 6 under Schedule II of Regulation 5 of 2016 Licensees Standards of Performance.

SOP reports filed by BOTH DSICOMS reveal that they are failing in meeting GSOP timelines for which they have to compensate automatically. Consumer should not be thrown to explicitly claim the GSOP compensation also.

Both DISCOMs are not meeting Overall SOPs also. A prudence check on the SOP reports filed has to be done. They are not doing things (calculations) right raising a doubt on whether they are doing right things (reported figures) or not.

SOP reports have many parameters/items with copy paste figures from last year SOP reports. There are many mathematical errors too. DISCOMs are just submitting SOP reports as statutory but not paying attention in contents and in preparing the report.

TGNPDCL claiming compliance of 100% Overall SOP standards on all items / parameters is alarming. Overall SOP timelines need to be revised, time to increase the bar. They also gave figures for the parameters which are no way can be filed by the consumers. I mean about SAIFI, SAIDI etc items, for which TGERC also has not decided on the standards.

Annexure I (GSOP) figures and Annexure II (OSOP) figures are contradicting each other and questions the credibility of figures and reports.

DISCOMS are deceiving as if they met the Overall SOP standards by not doing things (calculations) right. This throws whether they are doing right things or not, a doubt on the reported figures itself.

Thanks and Regards
Kiran Kumar Vempati
H.No.1-2-1/1, [Opp.CC Bank](#),
Sri Venkateswaraswamy Temple Road,
Near MM Court Circle, Suryapet-508213