

From: uconsultgroup@gmail.com

To: "Ramchander Vyasabhattu" <secy@tserc.gov.in>

Cc: cmd@tgnpdcl.com

Sent: Friday, February 28, 2025 4:07:52 PM

Subject: ARR filings NPDCL suggestions

Before the Hon Commission

Telangana Electricity Regulatory Commission

GTCS Colony

Hyderabad

Through the Secretary,

TSERC

SUB: Comments and suggestions on ARR& Tariff filings of TGNPDCLfor FY 2025-26

It is submitted to the kind notice of Hon.Commission that all the stakeholders need to prioritise Agriculture in terms of supply and service to ensure food security,safe, nutritious food, sustain employment,curtailurbanisation, safe guard environment etc.

Electricity regulation empathetic to Farming and allied sectors is imperative.It is yo be noted that The power consumption for Agriculture is decreased over the years.

Hence the following areas of concern need to be resolved.

1.Disruption in agl supply for various reasons persist.

The quality,assured supply especially in critical stages of crop production to be ensured and discoms to be directed for detailed operational, supervisory guidelines

2.The service deficiency, violation of SOP in DTR, supply disruption,release of new agl connections, is recurring in spite of submission time and again

3.The estimates for Agl is increased,and the supply of free poles of 3 is not adhered to.

For the past many years (from when DD was Rs. 350 to Rs. 6000 for an AGL), up to three poles were installed for the farmer who paid DD. Currently, they are not installed. We request that such three poles be provided

4, Reg 4-2013 states that transformers should not be included in the estimate. Therefore, we request that the transformer be removed from the estimate.

5 In the current estimate, about 20,000 is being charged for the transformer block. But the farmers themselves are constructing such transformer blocks at their own expense. The contractors, vendors are resorting to corruptive practices. This is happening in most of the agl cases (agl blocks). Therefore, pl remove the transformer block from the estimate and give additional material / costs to the farmer for such works.

6 We request that the date of release of connection to the AGL farmer and the material list submitted by the department be sent to those farmers through WhatsApp and by letter.

7 When a farmer applies for an AGL connection, he is told that neighboring farmers are not allowed to lay the line, so he is not given a connection, and is told that he should talk to that neighboring farmer himself.

It is requested that the department to take up this responsibility.

In such instances the poles should be laid along the roads and boundaries, not in the middle of the field.

8. Several DTRs are in the midst of crops, cultivating land, is prone for accidents. Such DTRs to be relocated sumoto with out request of farmers,

9. Safety measures and network upgradation is at snail pace ,snapped wires, Lack of AB switch, low hanging cables

Is a common scene

10.

a) Section 126 is acted upon arbitrarily .

Sec (5) If the assessing Officer reaches to the conclusion that use of electricity has taken place ,the assessment shall be made for entire period during which such unauthorised use of electricity has taken place and if however, the period. During which such unauthorised use of electricity has taken place cannot be ascertained, such Period shall be to a period of 12 months immediately preceding the date of inspection.

This regulation is not adhered and assessment done arbitrarily .The above clause itself untenable in the absence of evidence.

b) Unauthorised usage cases are registered en masse.

Several instances of cases for dairy ,agriculture were booked.

Animals are integral part of Farming,with focus in safe organic food and is going to be revolution.

Dairy animals up to 6 animals in the rural areas, to be treated as agriculture.

In all agl cases advisory notices to be issued quoting the regulatory guidelines since the rules are not made aware widely.

Only in repeated offences, cases are to be booked

8.The poultry sector repeatedly facing threats and on the brink of collapse .

The tariff for poultry is to be reviewed downwards.

Accidents:

a) Electrical accidents are very common and uncontrollable in Telangana. Human deaths are occurring at a rate of about two per day, which is more than 500 per year. Livestock deaths are also high. According to information, during the period 2014-2020, more than 5,000 deaths occurred in Telangana, in which young people aged 18-35 lost their lives, which reflects the severity of the accident. Our field observations revealed the following important reasons for such a high number of incidents:

Due to the strong belief among farmers that when there is an interruption in the agricultural supply,there will be no immediate solution from the DISCOM,farmers are taking the risk of their lives for the repair and restoration of supply on their own.

The data reveals the seriousness of losing precious human lives and livestock.The fatal cases are mostly that of the farmers.

For the sake of our luxury needs, lives cannot be an investment.

The disturbing fact is that they are caused by short comings of Discoms.

Even in such matters, the victims are not shown empathy.

b) Claim applications are pending for more than two years in suryapet and Khammam districts inspite of referring to senior officers.

There is bureaucratic hurdle for registration of accidents, abnormal delay in settlement of claims.

It should be directed to register an accident case instantly on mere report. Process may await compliance of requirements.

The family certificate, legal heirs certificates are made preconditions even for registration of accident claims.

In fact family certificates have no legal or administration standing.

Hon. Commission direct to settle claims by conducting a panchanama, affidavits, and verification of ration cards which the State govt is also following for family members

c) Zero tolerance accidents, to claim settlement to be directed with a clear time frame of 3 months.

In cases of the fatal accidents accountability of the concerned staff to be fixed and criminal cases are to be filed

d) Due to overloading of linemen work, skill gap, farmers are resorting to repair by themselves

It is very sad that low-level employees working in the field are dying. They should be given proper training and safety items should be given. It is requested to take action to ensure that they are worn.

Without line clearance, the repair of personnel should be controlled.

The staff should have a line map and DTR location map.

We request that doing electrical work with local people should be completely banned and that higher authorities should monitor it.

e) Earthing must be provided to every motor and single-phase DTR from the substation. This will prevent accidents to humans and livestock. The ex-gratia paid for such deaths will also save the department money of crores of rupees.

Heavy switches should be installed for all the existing DTRs. Similarly, even if there is a heavy switch in the estimate for new DTRs, the department should also install them.

f) In the villages, JLM and other electrical staff are not supporting the farmers within the standard performance limits. Another reason is the addition of other administrative responsibilities to the technical field staff.

g) In the areas where HT lines are down, there are maintenance errors and LT lines cable connection errors. Since the HT lines cables are not at the right height, the electrical staff is also hesitant to correct the errors due to the severe current.

h) The electricity department does not prominently display the toll-free numbers on every transformer, in public places, and in Panchayat areas. When electricity complaints are received, it is necessary to register them through the toll-free number

immediately and only then take action like repair service. . We request that such a toll-free number monitoring should be done at higher level.

i) When fatal electrical incident occurs, a thorough and transparent investigation should be conducted by a committee. The members of this committee should be the electrical inspector, DISCOM officer and the victim's family members.

Many suggestions and activities for the prevention of electrical accidents have been thoroughly discussed and recommendations have been given in the ERC meetings and the DISCOM officials' meetings.

j) CEA Regulation 2011 Electricity Supply Safety Rules should be followed. Under your supervision, a senior officer should handle the responsibilities of accident prevention.

Immediate steps should be taken to implement the instructions and decisions firmly at the field level.

Retail supply

1.The tariff for apartments is far higher than the gated communities etc,

The apartments are welfare associations with middle and lower income groups and constitute substantial number of customer base.This group also is the the prompt payers of billing.

A separate LT category of Apartments is to be segregated with lower tariffs

2.It is a common scene of poles in the midst of busy roads, and are accidental prone.

The pvt DTR s are also laid on the public roads in collusion with dept staff.

The DTRs in residential colonies,schools etc are also not protected by fencing,.

3.Delay of BTPS,YTPS IS TO BE REVIEWED

to avoid further consequential effects

4.Energy efficient management vs demand side management is need of the times.AT&C losses to be curtailed

5.The financial statements,balance sheet are not submitted with ARR without which the filings are infructious. Request for thorough scrutiny and balance sheet etc to be put in public domain

The employee,administrative costs be reduced for efficiency,health of the Discoms

5.Comparative parameters and performance with the state public, private DISCOMs will facilitate framing good regulations

6.The Hon Commission is requested to constitute watch dog body to oversee implementation of Commission orders, regulations

7.According to the information of CGRFs and consumer service centers, there are many services that are beyond stipulated SOP STANDARDS.

Such information should be provided in full details.

Compensation should be paid to the consumers suo moto for all the cases beyond the SOP.

8.The discoms shown huge arrears from public agencies viz street light, irrigation,and industry.Are the discoms collecting the penalties and particular thereof to be given.

The delay of collection results to passing on to the retail consumers in some form.

9.TDR,AT&C losses.

Though nominal improvement in TD losses is shown, it was repeatedly highlighted before the commission that the losses are adjusted in agl. since no dependable methodology is adopted.Separate Metres for agl feeder,/ DTR s are not installed.

10. Whenever network works are done,there is no notification or concurrence from the concerned persons.

11.It is replied by Dicoms on the complains of previous orders as

"shall be complied" ,which are long pending

The Commission needs to take appropriate action for non compliance of previous orders.

12.Distribution companies should explain the environmental protection measures,RE,and green energy.

People and organizations should be encouraged to provide quick assistance to conventional power generation. There are many complaints in net metering and grid connection

Cgrf

A look at the schedules of cgrf indicate that schedules are one per month for awareness programmes The geographical coverage is also scattered.Suggest to schedule a minimum of 3 per month till all the sections are covered.

The discoms need to mobilize the consumers,print vernacular brochures for the programmes.

Every programme should have a slot for sop,safety measures ,toll free numbers etc

Post adjudication ,data on the details of staff lapses and action taken there of is to be called for.

The Commission is requested to empanel representatives of agriculture ,retail consumers as observers in cgrf proceedings as their interest is not protected due to lack of awareness and required resources.

DTRs

Failed DTRs are reported at 15647 against total 22357.It is tobe examined with reference to the industry norms,quality.

Discoms shown transporting 70 % of failed DTRs.What are the reasons for other 30%.

It gives an inference that they are transported by agl consumers at their own cost,the fact of which was discussed in the public hearings time and again.

Yours sincerely

P V SubbaReddy

2-2-24,/302, DD colony

Hyderabad 500013

Mob:9949912610

Mail:uconsultgroup@gmail.com