

Telangana Rythu Power Distribution Company Limited (TGRPDCL)

**Responses to Objections / Suggestions
On
Licensee Application**

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Response to Telangana Electricity Employees Joint Action Committee (TEEJAC)		
1.	I. Creation of New DISCOM without Creation of Additional Posts The proposal for creation of a new DISCOM without sanctioning adequate additional posts is highly impractical and detrimental to employee interests. When a separate post of CMD, proposed to be headed by an IAS Officer, is considered necessary for administration of the new DISCOM, it is incomprehensible as to how the organization can function effectively without creation of corresponding Engineers and supporting staff posts. Instead of creating fresh posts, the proposal appears to envisage suppression/diversion of posts from the existing Utilities. Such suppression of posts will severely affect the employees presently working in TGSPDCL, TGNPDCL, TGTRANSCO and TSGENCO.	TGRPDCL submits that the proposed DISCOM is being established as a carve-out of existing utilities, hence the staffing plan has been designed considering the spread of agricultural consumers, network length, and geographical conditions. However, staffing requirements will be reviewed on an ongoing basis, and necessary posts will be created as per operational needs.
2.	2. Suppression of Posts will seriously affect Employees The proposal to suppress nearly 2000 posts from the existing Utilities is extremely alarming and unacceptable. The engineers presently working in the incumbent Utilities are not exclusively dealing with agricultural services alone. They are discharging multiple critical responsibilities including: • Operation & Maintenance • Breakdown Restoration	TGRPDCL submits that the proposed restructuring involves rational and need-based deployment of existing manpower, and is not intended to create any operational gaps in existing Utilities. However, staffing requirements will be reviewed on an ongoing basis, and necessary posts will be created as per operational needs.

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	• Protection Systems • Commercial Activities • DPE & Vigilance Functions • Construction Activities • Rural Electrification Works • Consumer Services • System Improvement Works • Load Management and Emergency Operations There is no separate engineering wing in the present Utilities exclusively dedicated to agriculture consumers. Diverting experienced manpower to the proposed DISCOM will create severe manpower shortages and operational vacuum in the existing Utilities. Especially where there is no recruitment of feeder cadre Engineer, i.e's AE's for the past 7 to 8 years. The existing employees are already functioning under tremendous work pressure due to shortage of staff. Any further reduction in manpower will adversely impact both employees and consumers.	
3.	3. Severe Impact on Promotions and Career Progression The proposed restructuring is likely to further damage the already affected promotional avenues of employees working in the existing Utilities. It is pertinent to submit that:	Incentive promotion is announced for the Employees opted to work in TGRPDCL in the G.O. MS. No. 44. The promotions are being considered after Appointment By Transfer to TGRPDCL, based on inter-se-seniority in RPDCL.

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	• Regular promotions in several cadres are already delayed for years. • Legal disputes concerning promotions are still pending resolution. • The Managements are continuing the practice of “In-charge Promotions” instead of regular promotions. • Employees are facing severe stagnation in career progression. • There has been no recruitment of Engineer for the past 7 to 8 years. In such circumstances, any proposal to grant regular or out-of-turn promotions in the proposed new DISCOM would amount to discrimination against employees working in the existing Utilities. The employees of all Utilities are equal in the eyes of the Government and the Hon’ble Commission. No restructuring exercise should create inequality among employees belonging to different Utilities.	
4.	4. Increased Work load and Employee Hardship Suppression of posts in existing Utilities will inevitably increase work load on the remaining employees. The existing engineers are already handling extensive jurisdictions and are attending round-the-clock emergency duties, break down restoration and consumer grievances under difficult field conditions. Further reduction in manpower will result in:	TGRPDCL submits that the proposed staffing plan is based on careful assessment of network requirements, geographical spread, and consumer base, and is not intended to increase workload on existing employees. The restructuring involves planned and balanced deployment of manpower, ensuring that both TGRPDCL and existing DISCOMs have adequate staff to perform their respective functions effectively.

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	• Excessive work burden • Increased stress and health issues among employees • Deterioration in work-life balance • Reduced operational efficiency • Delay in attending breakdowns and consumer complaints The creation of a new DISCOM should not become accursed to the employees who continue to serve in the existing Utilities.	TGRPDCL will ensure that no employee is overburdened, and that sufficient staff are deployed to maintain reliable service to consumers.
5.	5. Protection of Existing Service Conditions We respectfully submit that the Government and Managements appear to have overlooked the valid Tripartite Agreement entered in to with Employees Unions and Associations during the unbundling of the erstwhile APSEB in 1999. The said Agreement contains important assurances and protections concerning: With present transfer policy of Employees to 3rd Discom, Injustice is done to Telangana Native Engineers and employed youth. 3rd Discom to clarify how 95% Local Reservation, 33% woman reservation and ROR as per constitution is followed and achieved. • Service conditions • Employee welfare • Promotional avenues	All existing service benefits and service conditions in parent utilities are continued in TGRPDCL. The rules and regulations are also continued on par with parent utilities.

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	• Pensionary benefits • Organizational safeguards We request the Hon'ble Commission to carefully examine the Tripartite Agreement and ensure that all the provisions and protections guaranteed therein continue to remain fully applicable to all employees without any dilution.	
6.	6. Protection of Pension and PF Benefits We further submit that the "MasterTrust" constituted for safeguarding Pension and Provident Fund benefits of old pension employees still remains with the residual State of Andhra Pradesh. Any restructuring or transfer of employees without clearly addressing this sensitive issue may create uncertainty regarding retirement benefits and financial security of employees and pensioners. The interests of employees and pensioners must be fully protected before proceeding with any restructuring proposal.	All existing service benefits and service conditions in parent utilities are continued in TGRPDCL. The rules and regulations are also continued on par with parent utilities.
7.	7. Existing Utilities are Already Effectively Serving Agriculture Consumers The present Utilities are already efficiently serving agricultural consumers across the State. Engineers from the cadre of AE and above are promptly responding to agricultural consumer needs at field level. Presently, AE/Operation offices are located at Mandal Head quarters,	TGRPDCL submits as follows – As rightly pointed out by the objector, in a scenario where there is no separate DISCOM for agriculture and allied categories, an AE based at Mandal headquarters has to handle all the consumer categories in that area.

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	which enables timely response and accessibility to agriculture consumers. Under the proposed structure, field officers may have to operate from larger composite jurisdictions covering more than 100 villages, thereby affecting prompt service delivery. Thus, the proposal may not improve consumer service but may instead create administrative complications and additional burden on employees.	In the proposed scenario, though the AE may be based at Taluka the number of consumers to be catered to would be lower (since only specific categories are to be covered). This would enable the AE to serve the consumers in a better manner thereby improving service quality and consumer satisfaction. In addition, to further enhance consumer interface and grievance handling, TGRPDCL proposes to establish two Consumer Grievance Redressal Forums (CGRFs), which will provide an accessible and dedicated platform for timely resolution of issues. Accordingly, the proposal will result in better service focus, improved responsiveness, and enhanced consumer satisfaction.
8.	8. Need for Separate Supporting Wings in New DISCOM If a separate DISCOM is created, entirely separate supporting wings such as: • DPE • Vigilance • Material Security • Anti-theft Squads • Energy Audit Wings • Technical Support Wings	TGRPDCL submits that the requirement for supporting departments such as DPE, vigilance, energy audit, technical support etc has been duly considered in the proposed staffing plan. The staffing structure has been designed based on network requirements, geographical spread, and consumer base, ensuring that all necessary operational functions are adequately addressed.

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	Above wings will also have to be created independently. Existing wings of present Utilities cannot effectively function under fragmented jurisdictions without creating serious administrative and operational complications.	
9.	9. Proper Metering can Achieve the Intended Objective If the primary objective of the proposed DISCOM is monitoring and accounting of agricultural power consumption, the same can be effectively achieved through: • Strengthening of energy auditing mechanisms • Technological monitoring systems • Bifurcation of Agl feeders duly getting the funds from RDSS Scheme. • Extension of supply to • Agl Consumers through Dedicated 11 kV feeders only • Providing metering at 11 kV side only as LT Metering will not survive in Agl Sector. • Solarisation of Agl. feeders through various union Govt. schemes.	While operational improvements such as energy accounting, feeder segregation, and service standards are important and are being pursued, the proposed structure represents a broader structural intervention aimed at achieving focused accountability, better resource allocation, and long-term financial sustainability. Consumers are expected to benefited from improved quality and reliability of supply enabled through focused infrastructure development, better operational responsiveness due to dedicated service structures, and enhanced grievance redressal mechanisms. In this regard, TGRPDCL proposes to establish two Consumer Grievance Redressal Forums (CGRFs) to ensure prompt and effective resolution of consumer issues, thereby strengthening consumer interface and improving overall service standards.
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12.	3. Severe Impact on Promotions and Career Progression The proposed restructuring is likely to further damage the already affected promotional avenues of employees working in the existing Utilities. It is pertinent to submit that: • Regular promotions in several cadres are already delayed for years. • Legal disputes concerning promotions are still pending resolution. • The Managements are continuing the practice of "In-charge Promotions" instead of regular promotions.	Incentive promotion is announced for the Employees opted to work in TGRPDCL in the G.O. MS. No. 44. The promotions are being considered after Appointment By Transfer to TGRPDCL, based on inter-se-seniority in RPDCL.

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	• Employees are facing severe stagnation in career progression. • There has been no recruitment of Engineer for the past 7 to 8 years. In such circumstances, any proposal to grant regular or out-of-turn promotions in the proposed new DISCOM would amount to discrimination against employees working in the existing Utilities. The employees of all Utilities are equal in the eyes of the Government and the Hon'ble Commission. No restructuring exercise should create inequality among employees belonging to different Utilities.	
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15.	6. Protection of Pension and PF Benefits We further submit that the “MasterTrust” constituted for safeguarding Pension and Provident Fund benefits of old pension employees still remains with the residual State of Andhra Pradesh. Any restructuring or transfer of employees without clearly addressing this sensitive issue may create uncertainty regarding retirement benefits and financial security of employees and pensioners. The interests of employees and pensioners must be fully protected before proceeding with any restructuring proposal.	All existing service benefits and service conditions in parent utilities are continued in TGRPDCL. The rules and regulations are also continued on par with parent utilities.
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	Thus, the proposal may not improve consumer service but may instead create administrative complications and additional burden on employees.	In addition, to further enhance consumer interface and grievance handling, TGRPDCL proposes to establish two Consumer Grievance Redressal Forums (CGRFs), which will provide an accessible and dedicated platform for timely resolution of issues. Accordingly, the proposal will result in better service focus, improved responsiveness, and enhanced consumer satisfaction.
17.	8. Need for Separate Supporting Wings in New DISCOM If a separate DISCOM is created, entirely separate supporting wings such as: • DPE • Vigilance • Material Security • Anti-theft Squads • Energy Audit Wings • Technical Support Wings Above wings will also have to be created independently. Existing wings of present Utilities cannot effectively function under fragmented jurisdictions without creating serious administrative and operational complications.	TGRPDCL submits that the requirement for supporting departments such as DPE, vigilance, energy audit, technical support etc has been duly considered in the proposed staffing plan. The staffing structure has been designed based on network requirements, geographical spread, and consumer base, ensuring that all necessary operational functions are adequately addressed.

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18.	9. Proper Metering can Achieve the Intended Objective If the primary objective of the proposed DISCOM is monitoring and accounting of agricultural power consumption, the same can be effectively achieved through: • Strengthening of energy auditing mechanisms • Technological monitoring systems • Bifurcation of Agl feeders duly getting the funds from RDSS Scheme. • Extension of supply to • Agl Consumers through Dedicated 11 kV feeders only • Providing metering at 11 kV side only as LT Metering will not survive in Agl Sector. • Solarisation of Agl feeders through various union Govt. schemes.	While operational improvements such as energy accounting, feeder segregation, and service standards are important and are being pursued, the proposed structure represents a broader structural intervention aimed at achieving focused accountability, better resource allocation, and long-term financial sustainability. Consumers are expected to benefited from improved quality and reliability of supply enabled through focused infrastructure development, better operational responsiveness due to dedicated service structures, and enhanced grievance redressal mechanisms. In this regard, TGRPDCL proposes to establish two Consumer Grievance Redressal Forums (CGRFs) to ensure prompt and effective resolution of consumer issues, thereby strengthening consumer interface and improving overall service standards.
Response to Smt. M. Laxmi		
19.	TGRPDCL's Financial Position at Time of Application: Net worth (CA certified) Rs. 5,00,00,000 (Rs. 5 Crores) — share capital only; nil reserves; nil revenue Debt arranged / Lenders identified: Yet to be tied up — none identified	In accordance with G.O.Ms.No.44, the capital adequacy requirement is met through the Government guarantee, which provides backing for the TGRPDCL financial obligations. CAPEX requirements for meeting the new connection growth would be detailed as part of business plan submission. The transfer of the identified network to TGRPDCL, will enable the DISCOM to cater

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	Capital adequacy proof Self-certification by CMD only — no independent assessment	to supply of power to consumers. The government may infuse additional equity on need basis for operations of TGRPDCL. The net worth certificate was certified by the Chartered Accountant firm which is an independent assessment. Licensee will initiate the transfer of applicable loans. TGRPDCL will abide by conditions laid out by Hon'ble commission for grant of license.
20.	Staffing: Sanctioned Strength vs. Operational Reality - Field O&M linemen: Only 625 field: 1.07 linemen per mandal (584 mandals) - Field Artisans Grades I–IV: Only 344 field — 0.59 artisans per mandal — less than one artisan per mandal. - Staffing mechanism in GO Para 9: "Deputing, recruiting and outsourcing" NOT appointment by transfer. But Staffing mechanism in guidelines "Appointment by transfer" - permanent; a 4th mechanism not authorised by the GO. - Source utilities in application Para 21: TGSPDCL and TGNPDCL only Source utilities in guidelines TGSPDCL, TGNPDCL, TGTRANSCO, and TGGENCO not disclosed in the application	TGRPDCL submits that as per Clause 10 of G.O.Ms No 44 dated 17th Dec 25, there is a clear provision of transfer of employees to TGRDPCL. Additional staff would be looked at based on requirement.
21.	C. Approach & Methodology — What Para 22 Actually Says TGERC's deficiency notice dated 25.03.2026 specifically found the original Para 22 "insufficient." The elaborated response makes these commitments:	TGRPDCL will comply with the Standards of Performance Regulation issued by Hon'ble TGERC.

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	• "Ensure uninterrupted power supply with defined reliability standards." — No hours specified. No standards defined. • "Achieve high reliability indices (SAIDI/SAIFI improvements)." — No baseline stated. No target given. No timeline. • "Dedicated feeders for agriculture where feasible." — Feasibility undefined. Who decides it? • "Smart metering at all DTRs in a phased manner." — No phase defined. No completion date. The only section describing how TGRPDCL will serve farmers — contains not a single quantified target, committed timeline, or operational mechanism. TGERC asked for elaboration and received aspirations. Every statement in Para 22 is a brochure aspiration. Neither the original nor the elaborated version has a single quantified commitment or strategy that transpires confidence	The points mentioned in the application are the objectives set out to be achieved by TGRPDCL during the course of operations. These would be elaborated in the Business Plan Document. Metering of DTR works would be taken up in a phased manner and would be defined in the business plan. It may be noted that as per the recent APTEL judgement dated 11th March 2026, phased development of distribution network is permissible.
22.	The Application Is Materially Incomplete and Cannot Be Evaluated — Regulation 04 of 2016 Requires a Business Plan and Financial Projections at the Time of Filing Without a business plan, the Commission cannot assess whether TGRPDCL has a credible strategy for agricultural supply. Without financial projections, it cannot assess whether TGRPDCL can pay its power purchase bills	<i>TGRPDCL submits as follows-</i> As per clause 38.1 of Regulation 4 of 2016, <i>subject to other regulations notified by the Commission, the Distribution Licensee shall submit a Business Plan within three (3) months of the Distribution Licence coming in force for such period as the Commission may direct and shall update such plan annually. The Business Plan shall, inter-alia, contain (i) year wise load growth, (ii)</i>

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		<i>year wise Distribution loss reduction proposal along with specific action plan, (iii) metering plan for metering interface points, (iv) treatment of previous losses, (v) cost reduction plan, and (vii) other important financial analysis or parameters.</i>
23.	The Proposed Transfer of the Existing DISCOMs' Undertakings Has Not Received Commission Approval Under Section 17(2)(a) — An Immediate Statutory Violation Section 17(2)(a) of the Electricity Act, 2003 mandates that no distribution licensee shall transfer its undertaking or any part thereof without prior approval of the Commission. The agricultural supply component — including consumer connections, DTRs, LT lines, PPAs, subsidy streams, and operational responsibility — clearly forms part of the existing DISCOMs' undertaking. Its transfer to TGRPDCL without approval violates Section 17(2)(a) and cannot proceed lawfully. Further, proceedings under Section 18 cannot override Section 43, which imposes a statutory obligation to supply electricity. License conditions cannot supersede statutory duties, and only Parliament can amend such provisions. Section 19(2) reinforces that even revocation of a licence does not automatically discharge obligations unless specifically directed. Accordingly, both existing DISCOMs and TGRPDCL may simultaneously retain supply obligations to the same consumers, creating legal and operational ambiguity.	Provisions under Section 131 of the Electricity act 2003 permit the formation of a new licensee through transfer scheme.

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	Declare that Section 17(2)(a) approval has not been sought or granted for the proposed transfer; direct TGSPDCL and TGNPDCL to file formal Section 17(2)(a) applications; and decline to grant the TGRPDCL licence in isolation, as doing so would not and cannot release the existing DISCOMs from their Section 43 duty, creating irresolvable dual mandatory supply obligations for the same consumers in the same areas.	
24.	A Distribution Licence Is Area-Based, Not Consumer-Class-Based — Section 14 Provides No Statutory Basis for TGRPDCL’s Application Section 14 of the Electricity Act mandates that distribution licences are area-specific, with obligations under Sections 15, 42(5), and 43 tied to a defined area of supply. The Act does not provide any basis for licences restricted to a class of consumers across the State. The Electricity (Amendment) Bill, 2025 further reinforces that the Universal Service Obligation rests with the existing area-based licensee, confirming that consumer-class-based licensing is outside the statutory framework. The Act already provides an alternative mechanism through franchise arrangements under Section 14, enabling operational segregation without extinguishing the existing DISCOMs’ statutory obligations. In this context, granting a consumer-class-restricted licence leads to legal and operational inconsistencies, including inability to discharge universal supply obligations.	The USO mandated under Section 43 of E Act is to ensure that no consumer is denied supply power by a Distribution licensee. In the present scenario, TGRPDCL is mandated to supply power to agricultural & allied categories. Other categories of consumers would be continued to be supplied power from the incumbent discoms. It may be noted that the mechanism of supply of power through a franchisee arrangements are not contemplated as per the GOMs issued by GoTG.

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	Accordingly, it may be examined as a preliminary issue whether such licensing is permissible; if not, the proposal may be restructured under a franchise model.	
25.	CONSUMER RIGHTS: Consumer protection is central, as agricultural consumers are the stated beneficiaries of this proposal. However, despite this, no document indicates that consumers were consulted/ informed. The 29 lakh farmers whose supply arrangements are being restructured have not been given an opportunity to express their views, even though their existing electricity connections are proposed to be transferred to a new entity without their participation. No Provision in the Electricity Act Permits Compulsory Transfer of Consumer Connections Without Consumer Consent on the Basis of Consumer Class Read with Section 43 of the Act The Government's Political Promise of Free Power Does Not Confer Upon It Any Agency Over Consumer Connections (i) Declare that Section 65 creates no agency or ownership interest of the Government over agricultural consumer connections. (ii) Declare that no consumer connection can be compulsorily transferred to TGRPDCL without the individual consumer's informed consent, as no provision of the Electricity Act, 2003 authorises mass administrative reassignment of consumer connections on basis of consumer class.	TGRPDCL submits that as per the provisions in Section 131 of the Electricity Act 2003, the State Government is empowered to draw up a transfer scheme to vest in a transferee -the property, interest in property, rights & liabilities. The above section also provides for ensuring economic efficiency and consumer interests.

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	(iii) Direct TGRPDCL and the State Government to establish a consumer information and consent mechanism before any connection is transferred.	
26.	No Consumer Grievance Redressal Forum and No Transition Safeguards: Section 42(5) requires every distribution licensee to establish a Consumer Grievance Redressal Forum. Neither application document specifies when TGRPDCL will establish its CGRF, what the interim mechanism is, or what happens to pending grievances at the existing DISCOMs at the date of transfer. A DISCOM without a functional CGRF at commencement violates Section 42(5) on day one. Require TGRPDCL to submit a detailed time-bound transition plan, establish its CGRF before commencement of operations, and provide specific safeguards for continuity of consumer records, billing, and grievance handling during the transition period.	TGRPDCL submits that in accordance with the extant regulations separate CGRFs will be established for TGRPDCL upon obtaining the Distribution License from the Hon'ble TGERC.
27.	OPERATIONAL IMPOSSIBILITY — WHY TGRPDCL CANNOT DELIVER WHAT IT PROMISES • TGRPDCL Cannot Restore Its Own Consumers' Supply — The SAIDI/SAIFI Promise Is Structurally Impossible. • No Mechanism for 11kV Infrastructure: While TGRPDCL can install DTRs for new agricultural connections, it lacks mandate and assets for required 11kV feeder extensions. There is no clarity on who will build or	TGRPDCL submits that the identified network as per GO would be transferred from the incumbent DISCOMs. This will enable TGRPDCL in supply power to its consumers. Further 'Service Agreements' would be entered with incumbent licensee for upstream assets. This will ensure adherence to Standards of Performance. “

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	fund them, creating a fundamental implementation gap. • The Split-Asset Model Creates Irresolvable Daily Operational Conflicts • No Wheeling Tariff Framework Exists for This Inter-Licensee Arrangement • Energy Accounting Is Impossible on Mixed-Load Feeders Until Feeder Separation Is 100% Complete	
28.	TGRPDCL's staffing framework, as per its guidelines, reveals multiple serious deficiencies that are legally questionable, administratively premature, and operationally unviable. The guidelines introduce "appointment by transfer," which goes beyond the GO's permitted mechanisms of deputation, recruitment, and outsourcing. This results in permanent diversion of staff from already understaffed DISCOMs, contrary to the intent of preserving their sanctioned strength. Existing utilities are already operating with critical staff shortages, compromising safety, operations, and service delivery. The proposed transfer of 2,000 employees will further weaken these entities, even while TGRPDCL depends entirely on their infrastructure. Staffing process: The Process Is Legally Vulnerable at Every Stage and Constitutionally Flawed	The GO provides for transfer of employees from incumbent utilities to TGRPDCL. A comprehensive 'Employee Option Process' has been rolled out. This allows the employees to opt as per their choice. Employees would be considered based on the well laid criteria. Guidelines for exercising options have been communicated to employees and has been updated

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	• Irrevocable Employee Choice vs. Absolute Employer Discretion (Art. 14): Employees are permanently bound, while TGRPDCL retains unlimited rejection power without reasons, making the process arbitrary. • 8-Day Unreasonable Window: Irreversible career decisions (VRS ban, severance, statewide posting) are required within 8 days, violating principles of informed consent. • Transfers Before Regulatory Approval: Employees are shifted before regulatory approval, assuming licence grant and risking irreversible staff depletion if rejected. • Promotions Without Framework: Promotions are promised despite absence of service rules or a defined promotion policy. • Seniority Inversion (Arts. 14/16): Junior employees may supersede seniors without merit assessment, leading to legal disputes and operational disruption. • Artisan Disincentive: Minimal benefit for permanent transfer discourages participation, risking collapse of field workforce. • Secret Pre-Selection: Preferential selection of deputed staff without transparency, combined with arbitrary rejection powers, creates a non-transparent system inconsistent with public employment norms.	

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29.	Total Telangana mandals (33 districts)	Approximately 584 mandals	TGRPDCL submits that the proposed staffing plan has been designed after considering the spread of agricultural consumers, network length, and geographical conditions. TGRPDCL submits that the proposed staffing plan has been proposed as per G.O.Ms.No.44, dated 17.12.2025. The 1,000 O&M staff and artisans will be allocated based on actual field requirements, The staffing details mentioned are preliminary requirements. Further, appropriate operational planning and resource allocation strategy will be adopted to handle issues related to power supply and ensure timely restoration, especially during critical agricultural periods.
	All field O&M and Artisan per mandal	$969 \div 584 = 1.66$ persons per mandal	
	Field O&M linemen (FM+SLI+LI+LM+ALM+JLM) per mandal	<i>625 ÷ 584 = 1.07 linemen per mandal</i>	
	Agricultural consumers per mandal (average)	Approximately 4,966 consumers	
	Agricultural DTRs per mandal (estimated)	<i>Approximately 770 to 857 DTRs</i>	
	DTRs per field lineman	<i>Approximately 730 to 820 DTRs per person</i>	
	If artisans do not opt	<i>Shortfall exceeds 80% below established minimum of 5 to 7 per mandal</i>	
1.07 linemen per mandal against an established minimum of 5 to 7. Rural mandals across several districts span 200–400+ sq. km, with one-way travel to remote agricultural DTRs taking 45–60 minutes. A single DTR restoration takes 4–8 hours, during which other faults remain unattended. During peak seasons, multiple failures occur simultaneously (e.g., 1% of 800 DTRs = 8 concurrent faults), overwhelming limited O&M staff. Timely restoration is critical, as delays beyond 24–48 hours during key crop stages can cause irreversible crop loss, wiping out investments for farmers. Such operational stress and overlapping responsibilities across multiple utilities risk increased disputes and litigation, ultimately affecting service delivery across the sector.			

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30.	Request on Staffing: (i) Stay all appointment by transfer orders until after the Commission's decision on the licence application. (ii) Require TGRPDCL to disclose cadre-wise and mandal-wise staffing on the basis of the sanctioned strength statement, against established minimum norms. (iii) Require TGRPDCL to publish service regulations before any employee makes an irrevocable transfer decision. (iv) Address on affidavit the seniority inversion and its consistency with Articles 14 and 16. (v) Constitute and fund the pension trust before permanent transfers commence. (vi) Certify that post-transfer parent DISCOM strength remains above minimum for safe operation under CEA Safety Regulations 2011	TGRPDCL submits that due process has been followed with transparently laid out guidelines for all employees.
31.	GOVERNANCE — STRUCTURAL CONFLICTS THAT MAKE INDEPENDENT OPERATION IMPOSSIBLE Every Director of TGRPDCL simultaneously holds a senior position in TGSPDCL or TGNPDCL. The Director (Finance)/TGNPDCL must negotiate wheeling charges with TGNPDCL on behalf of TGRPDCL. The Director (Operations)/TGSPDCL must set 11kV restoration priorities	TGRPDCL submits that the current Board composition reflects the transition phase of the new entity. The directors from TGSPDCL and TGNPDCL bring deep sector expertise and knowledge of the existing distribution network, which is essential for a smooth transition.

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	balancing his own DISCOM's consumers against TGRPDCL's. The Company Law Advisor of TGRPDCL is the Company Secretary of TGSPDCL. Require TGRPDCL to demonstrate an independent governance structure with directors who do not simultaneously hold senior positions in entities with which TGRPDCL must negotiate at arm's length as a mandatory pre-condition for the licence.	All bilateral arrangements, wheeling charges, asset valuations, and PPA reallocations will be handled in a transparent manner and will be indicated in relevant filings to Hon'ble Commission from time to time.
32.	FINANCIAL IMPOSSIBILITY — WHY TGRPDCL CANNOT SURVIVE AS AN INDEPENDENT ENTITY (i) Rs. 5 Crores of Capital Cannot Underwrite a State-Wide DISCOM. The Distribution Licence Rules, 2005 Rules Are Not Met. TGRPDCL has no operating history, minimal share capital (₹5 Cr), no reserves, credit rating, or arranged debt, relying only on self-certification by its CMD. This is inadequate, as even a single feeder project exceeds ₹5 Cr, making such capital insufficient for a state-wide DISCOM licence. (ii) Transfer of Accumulated Arrears Ensures Negative Net Worth From Day One (iii) 100% Subsidy Dependence Creates a Direct Risk to Farmers' Power Supply (iv) Subsidy Default Will Cascade and Cripple All Three DISCOMs Through the Shared 11kV Network	(i) It may be noted that loans transferred to 3rd discom are backed by State Government Guarantee. Also, in due course based on need there would be support from GoTG (ii) The allocation of assets and liabilities is part of a structured reorganization aimed at improving overall financial stability of all three DISCOMs, and not merely a transfer of burden. (iii) Agricultural supply is already supported through established Government subsidy frameworks. TGRPDCL's revenue gap will be met through timely subsidy releases. (iv) Section 65 of the Electricity Act, 2003 mandates that subsidy shall be paid in advance by the State Government. This provision ensures timely release of subsidy.

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	(v) Cross-Subsidy Elimination Is Legally Required but Structurally Impossible for TGRPDCL. TGRPDCL is structurally incapable, by design, of ever moving toward cost-reflective tariffs	(v) As per the existing legal and regulatory framework, cross-subsidy is to be reduced progressively. The allocation of higher share of low-cost renewable energy to TGRPDCL helps moderate cost of supply, ensuring that uniform tariff across the state.
33.	The objector submits that TGRPDCL's primary purpose is financial restructuring rather than improving agricultural supply. Existing DISCOMs face financial distress and risk losing access to RDSS and Central grants. RPDCL is created enabling transfer of liabilities from existing DISCOMs, improving their financials on paper without actual debt repayment. This enables both existing DISCOMs and TGRPDCL to separately access Central grants, effectively doubling inflows without real operational improvement. Consequently, RPDCL inherits large liabilities without revenue strength, creating long-term financial risk while leaving the original problem unresolved. The Commission's licence is critical to this process; without it, the restructuring lacks regulatory basis. The proposal raises concerns of misuse of statutory powers and creation of an additional monopoly without accountability. Request (i) Direct the State Government and TGRPDCL to disclose on affidavit all communications relating to RDSS or any other Central grant	The formation of TGRPDCL is a reform aimed at improving financial stability, transparency, and service delivery, particularly for the agricultural segment, and not merely a balance sheet adjustment exercise. The allocation of assets, liabilities, and power procurement is being undertaken in a structured manner to ensure overall financial sustainability of all DISCOMs, It is also submitted that there is no duplication or doubling of inflows from RDSS or other Central schemes, as such assistance is linked to specific outputs (such as number of smart meters installed and other scheme-linked milestones). Accordingly, restructuring does not create any scope for additional or unjustified grant access. DISCOMs submit that their financial statements are already publicly available on their respective websites, ensuring transparency and accessibility. Post formation of TGRPDCL, the

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	applications premised on TGRPDCL's formation. (ii) Commission independent verification of pre- and post-restructuring DISCOM balance sheets. (iii) Forward a copy of final order to the Ministry of Power, REC (RDSS implementing agency), and Office of the CAG before any Central grant applications premised on this restructuring are processed.	same practice will be followed, and its financials will also be disclosed.
34.	SYSTEMIC RISKS: (i) This Licence Creates a National Precedent With No Principled Limit. If TGERC grants TGRPDCL a licence on the ground that Section 14 permits consumer-class-restricted licensing, it establishes a legal principle it cannot distinguish from the following application: a private company applies for a licence to supply exclusively High Tension industrial consumers across the entirety of Telangana. "On what legal principle would TGERC refuse that application?" TGERC's decision in this matter will be the first regulatory order in India granting a consumer-class-restricted distribution licence. It will be cited before every SERC and before APTEL across India. (ii) The Commission's Institutional Independence Is at Stake (iii) Every objective cited for TGRPDCL is fully achievable by a Commission direction. Consider issuing a direction under Section 86 to the existing DISCOMs to implement ring-fenced agricultural	TGRPDCL submits that one of the fundamental objectives of the reform is to improve the quality of service to agricultural and allied consumer categories. Usually, agricultural network brings in more complexities due to sparse consumer spread over greater area, load variations etc., TGRPDCL submits that as per GO, it would be bound to serve all such consumers hence meeting the basic objectives of Universal Service Obligation. TGRPDCL submits that the reform measure needs to be seen in light of the welfare benefits to farmers due to improvement in quality of supply On the other hand, the point raised by the objector to serve exclusively the HT industrial consumers clearly amounts to 'cherry picking'. Such a situation is against the objects of Electricity Act 2003

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	supply accounting, dedicated Agricultural Supply Divisions, and specific feeder service quality standards as a proportionate alternative to granting the licence, and direct the existing DISCOMs to submit proposals for this within 30 days.	While operational improvements such as energy accounting, feeder segregation, and service standards are important and are being pursued, the proposed structure represents a broader structural intervention aimed at achieving focused accountability, better resource allocation, and long-term financial sustainability.
Response to Sri. Cherukupalli Srinivasu,		
35.	The following are the constitutional violations: A) Article 14 of the Indian Constitution guarantees the fundamental Right to Equality. It mandates that the State shall not deny to any person “equality before the law” or the “equal protection of the laws” within the territory of India. This applies to all persons, whether citizens or foreigners. But, the Govt. denying promotions to the existing power entity employees and showing discrimination to the TGRPDCL opted employees by giving promotions, vide G.O. Ms No. 44, Dt.17-12-2026. This is violation of Article 14 of Indian Constitution. B) Article 16 of the Indian Constitution guarantees all citizens equality of opportunity in matters of public employment. It prohibits the State from discriminating against anyone in government jobs on grounds only of religion, race, caste, sex, descent, place of birth, or residence. Clause (2): Prohibits discrimination on grounds of religion, race, caste, sex, descent, place of birth, or residence. Clause (4A) & (4B): Protects and extends	A) Incentive promotion is announced for the Employees opted to work in TGRPDCL in the G.O. MS. No. 44. B) The promotions are being considered after Appointment By Transfer to TGRPDCL, based on inter-se-seniority in RPDCL.

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	reservations in matters of promotion and allows unfilled reserved vacancies to be carried forward to subsequent years. But, Govt is offering, enticing “Promotion” to the employees of existing power sector employees to opt TGRPDCL during options exercise, which is nothing but “Quid Pro Quo” which is violation of Article.16, constitution of India. C) It is a general practice by Central Government or State Government administration that, the division of staff should be taken by a High Level committee appointed by the government on the basis of cadre strength ratio. Which is observed in bifurcation of AP State in to AP State and Telangana State, APSEB in to APTRANSCO and APGENCO, APTRANSCO in to APCPDCL. APEPDCL, APCPDCL in to TGSPDCL and TGNPDCL. But, here No High Level Committee was formulated and the successive entity, I.e., TGRPDCL is taken up the Staff options execution..... Which is violation of natural justice. D) G.O. Ms No.44 states no new posts are to be created by newly formed TGRPDCL, should be shifted from existing power sector entities TGTRANSCO, TGGENCO, TGSPDCL and TGNPDCL. But the number of posts are to be shifted from the existing entities was not yet confirmed, but options process executed by TGRPDCL from the existing power sector entities which is procedural lapse and against natural justice. E) Though same batch officers in the power sector entity, due to the “Offer of Promotion to TGRPDCL”, the junior officer becomes a senior officer and	C) The procedural steps to form TGRPDCL is followed. D) 2000 Nos. of Employees & Posts are proposed for Appointment By Transfer to TGRPDCL. E) As per the procedure for Bifurcation of Utilities, the Services & Promotions are taken up by TGRPDCL duly fixing inter-se-seniority

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	they supposed to work in parallel at the same geographical area from their respective companies, which creates unrest in employees which is against to natural justice.	in TGRPDCL.
36.	The necessity of formation of a new entity is to be announced to clarify the stake holders like Farmers, Irrigation Entities, Drinking Water supply entity, Lift Irrigation entities. “Existing Power Supply difficulties - Over coming solutions by TGRPDCL” are to be clarified to stake holders like Farmers, Irrigation Entities, Drinking Water supply entity, Lift Irrigation entities.	Agriculture and allied consumers will benefit from improved quality and reliability of supply enabled through focused infrastructure development, better operational responsiveness due to dedicated service structures, and enhanced grievance redressal mechanisms. In this regard, TGRPDCL proposes to establish two Consumer Grievance Redressal Forums (CGRFs) to ensure prompt and effective resolution of consumer issues, thereby strengthening consumer interface and improving overall service standards.
37.	6) No Committee have been made detailed study about the possibilities for “Formation of new entity RPDCL” in respect of distribution of electricity supply in the “Already Licence Issued to Existing Distribution Company in Particular Geographical Area”. Hence an Experts Committee with relevant Distribution Field should be formulated to study and analyse the existing Distribution of Electricity Supply problems.	TGRPDCL submits that the proposal for formation of the new entity has been undertaken after due consideration of sector requirements, operational feasibility, and financial implications. Necessary analysis was carried out to ensure that the proposed framework is practical and aligned with sector objectives. Accordingly, the proposal reflects a well-considered approach, and Hon’ble commission review will ensure all aspects are appropriately examined before implementation.
38.	7) The existing Lines Network utilisation and maintenance was not yet clarified neither by existing Distribution Company nor the Third Discom.	TGRPDCL submits that the proposed framework provides for a

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	Combined utilisation of equipment leads to lack of concentration by both Distribution Company staff, which leads to failure of Electricity supply in that area, suffering the poor Farmers, Drinking water entities, Irrigation Water supply Bodies ultimately “Disturbance of Existing Quality Power Supply”.	clear demarcation of responsibilities between the DISCOMs for network maintenance. Each DISCOM will be accountable for its designated assets and services, ensuring focused operations without overlap. Further, well-defined procedures and coordination mechanisms will be established to maintain service continuity and avoid any disruption. Accordingly, the arrangement is designed to ensure efficient maintenance, uninterrupted power supply, and improved service quality for all consumers.
39.	8) At present condition, there is a acute shortage of Line staff and Field Engineers and the existing staff are over burdened with the retirement of staff. These staff bifurcation leads to increase further burden on the existing continuing staff, which is not viable and maintainable, which causes prolongment of restoration of power supply during power failure, which is causes further delay in restoring power supply to the consumers who are situated in scattered areas.	TGRPDCL submits that the proposed staffing plan has been proposed as per G.O.Ms.No.44, dated 17.12.2025. The 1,000 O&M staff and artisans will be allocated based on actual field requirements, The staffing details mentioned are preliminary requirements. .
40.	9) Discom Authorities Duplication of geographical jurisdictions leads to confusion in the consumers and ambiguity in concerned area officers.	TGRPDCL submits that the proposed framework does not envisage duplication of geographical jurisdictions, and there will be a clear demarcation of service categories as per G.O. Ms. No. 44 dated 17.12.2025 and responsibilities among the DISCOMs. Further, well-defined guidelines, procedures, and operational protocols will be established, leaving no scope for ambiguity or

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		confusion for consumers or DISCOM employees.
41.	10) Utilisation of same infrastructure like Electrical Lines, Poles, Power Transformers etc by two different entities like existing DISCOM and Third Discom poses utilisation issues, maintenance etc.	TGRPDCL submits that the proposed framework provides for a clear demarcation of service categories and responsibilities among the DISCOMs. Further, well-defined guidelines, procedures, and operational protocols will be established, ensuring that each DISCOM is responsible for its designated assets and services.
42.	11) Tripartite Agreement was signed before the formation of existing Discoms after elaborated discussions about the employee's welfare between 1) Employees Welfare Associations, 2) DISCOMS Management and 3) Principal Secretary, Energy Department, Govt of Telangana. But, NO Discussions were held about the welfare of employees neither by DISCOMS Management nor by the third Discom Management.	Multiple discussions have already been held with all Associations and Unions, including a meeting with the CMD, TGRPDCL on 24th April 2026, and another meeting with the Hon'ble Special Chief Secretary for Energy on 5th May 2026.
43.	12) Majority Farmers services, RWS (Rural Water Supply) connections etc. are connected to the village network lines and equipment, i.e., one line, two Discoms staff. Which creates confusion during maintenance.	It may be noted that majority of agricultural consumers are connected to LT network and as per the GO this infrastructure would be transferred to TGRPDCL. Hence the concern of the objector would be addressed.
44.	13) As we seen in Newspapers Dt. 04-05-2026, Andhrajyothi, Main Edition, 1st page, that Hon'ble CM garu reviewing arrears of Fifty Five Thousand Crores to be paid Electricity Department from the water providing entities for drinking and irrigation. For such instances the Third Discom can not survive itself by extending power supply to Farmers,	Financial sustainability of TGRPDCL would be achieved through timely receipt of government subsidies and revenue collections from LIS, CPWS, HMWSSB.

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	RWS, Mission Bhagiratha without revenue collections for a prolonged period from the government for the supplied consumption.	
45.	14) The third Discom cannot survive without revenue collections from Govt and the Employees will suffer for Salaries. For which, government has to arrange staff salaries on par with government employees' salaries financial head of account "Salaries - 010" In view of the above, the Formation of Third Discom is not a solution to improve the quality power supply and requesting the Honorable TGERC to examine the above Constitutional violations, objections, opinions while granting the Licence to newly forming third DISCOM, i.e., TGRPDCL.	The provisions under Section 131 of Electricity Act empower the State Government to notify a transfer scheme outlining the formation of a new entity. Existing mechanism of payments of salaries to employees will continue.

శ్రీ కె. ఈశ్వర్ రావు, నాగారం, మేడ్చల్ వారికి సమాధానం:

46.	-- ప్రభుత్వ బకాయిలు మరియు జనరేటింగ్ సంస్థలకు చెల్లింపుల బదిలీ. -- జి.ఓ.ఎం.ఎస్ నెం.44 లోని టేబుల్-9 ప్రకారం ప్రభుత్వ బకాయిలు మరియు విద్యుత్ ఉత్పత్తి సంస్థలకు చెల్లించాల్సిన బకాయిలను మొత్తం రైతు విద్యుత్ పంపిణీ సంస్థకు బదిలీ చేయాలని ప్రతిపాదించారు. -- దీనితో కొత్త విద్యుత్ పంపిణీ సంస్థ ప్రారంభం నుంచే నష్టాల్లో నడిచే సంస్థగా మారుతుంది. ప్రభుత్వ చెల్లింపులు ఆలస్యమైతే విద్యుత్ ఉత్పత్తి సంస్థలకు చెల్లింపులు చేయలేని పరిస్థితి ఏర్పడి,	బదిలీ తేదీ నాటికి ఉన్న స్థితి ఆధారం చేసుకొని వాస్తవంగా TGRPDCL కు బదిలీ చేయబడే బకాయిలు నిర్ణయించబడును. ఆ తేదీ అనంతరం గౌరవ కమిషన్ ఆమోదించే సబ్సిడీ బకాయిలు లేదా ట్రూ-అప్ మొత్తాలు కూడా తుది సర్దుబాటులో భాగంగా చేర్చబడును. బదిలీ ప్రక్రియ ఖచ్చితత్వం మరియు పారదర్శకతతో కొనసాగుటకు
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	వాటి ఆర్థిక స్థితి కూడా దెబ్బతింటుంది. -- రైతు (వ్యవసాయ) విద్యుత్ పంపిణీ సంస్థ ఆర్థిక లేదా కార్యనిర్వహణ వైఫల్యానికి గురైనప్పుడు విద్యుత్ సరఫరా ఎలా కొనసాగిస్తారనే అంశంపై ప్రతిపాదనలో స్పష్టత లేదు. -- ప్రస్తుతం వినియోగదారుల బకాయిలలో అత్యధిక భాగం TGRPDCL సంస్థకు బదిలీ చేశారు. మరియు TGSPDCL మరియు TGNPDCL సంస్థలు చెల్లించాల్సిన 26950 కోట్ల రూపాయలను కూడా బదిలీ చేశారు. -- TGSPDCL & TGNPDCL సంస్థలకు రాష్ట్ర ప్రభుత్వ శాఖలు చెల్లించాల్సిన మొత్తం 45398 కోట్లు. అందులో 35982 కోట్ల రూపాయలను TGRPDCL సంస్థకు బదిలీ చేశారు. -- చివరి ప్రత్యామ్నాయ సరఫరాదారు వ్యవస్థ లేకపోవడం ప్రజా ప్రయోజనాలకు మరియు చట్టపరమైన బాధ్యతలకు ప్రమాదకరం. -- జి.ఓ.ఎం.ఎస్ నెం.44 ప్రకారం వాణిజ్య మరియు పారిశ్రామిక వినియోగదారులను ప్రస్తుతం ఉన్న విద్యుత్ పంపిణీ సంస్థలలోనే ఉంచి, సబ్సిడీ వినియోగదారులను వేరే విద్యుత్ పంపిణీ సంస్థకు మార్చాలని ప్రతిపాదించారు. -- దీనితో ప్రస్తుతం ఉన్న విద్యుత్ పంపిణీ సంస్థలు అధిక ఆదాయం వచ్చే సంస్థలుగా మారి, ప్రైవేట్ రంగానికి ఆకర్షణీయంగా	అవసరమైన పూర్తి మరియు నవీకరించిన బకాయిల వివరాలు బదిలీ సమయంలో అందించబడును. ప్రభుత్వం నుండి సబ్సిడీ మొత్తాలు సమయానుకూలంగా అందించబడును. అదేవిధంగా, TGRPDCL సంస్థ వ్యవసాయ విద్యుత్ సరఫరాతో పాటు లిఫ్ట్ ఇరిగేషన్, HMWSSB, CPWS తదితర ఇతర వినియోగ వర్గాలకు కూడా విద్యుత్ సరఫరా అందించుచున్నది. వీటి ద్వారా సంస్థకు ఆదాయం సమకూరును.

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	మారే అవకాశం ఉంది. ఈ నేపథ్యంలో ఉద్యోగుల్లో ప్రైవేటీకరణపై తీవ్ర ఆందోళన నెలకొంది.	
47.	మొత్తం 5,22,479 విద్యుత్ ట్రాన్స్ ఫార్మర్లు మరియు విద్యుత్ లైన్ల నిర్వహణ కేవలం 2000 మంది సిబ్బందితో ఎలా సాధ్యపడుతుంది	ప్రస్తుతం జి.ఓ.ఎం.ఎస్. నెం.44 ప్రకారం 2000 మంది సిబ్బందికి ఆమోదం ఇవ్వబడింది. భవిష్యత్తులో అవసరాన్ని బట్టి మరిన్ని ఉద్యోగులను నియమించబడతారు.
48.	-- రైతాంగానికి ఉచిత విద్యుత్ సరఫరా కోసం అయ్యే ఖర్చులో కొద్దిమొత్తాన్ని రాష్ట్ర ప్రభుత్వం చెల్లిస్తోంది. మిగిలిన మొత్తాన్ని ప్రస్తుతం విద్యుత్ డిస్కంలు అయిన TGSPDCL మరియు TGNPDCL సంస్థలు క్రాస్ సబ్సిడీ రూపంలో సర్దుబాటు చేసుకుంటున్నాయి. కానీ ఇప్పుడు ప్రతిపాదించిన TGRPDCL సంస్థకు క్రాస్ సబ్సిడీ ఏ విధంగా సాధ్యపడుతుంది. ఈ భారాన్ని ఎవరు భరిస్తారు. -- కొత్తగా ఏర్పాటు చేసిన ఈ విధమైన లాభార్జన లేకుండా ఉండే TGRPDCL సంస్థకు ఈ బదిలీలు పెను భారంగా మారే అవకాశం ఉంది.	జి.ఓ. సవరణ G.O.Ms.No.8 తేదీ 08.05.2026 ప్రకారం TGRPDCL కు అధిక శాతం పునరుత్పాదక శక్తి (Renewable Energy) కేటాయించబడుతుంది. దీని వలన ఆ సంస్థ యొక్క మొత్తం విద్యుత్ సరఫరా వ్యయం తగ్గి, రాష్ట్రవ్యాప్తంగా వినియోగదారుల వర్గాల వారీగా సమాన విద్యుత్ చార్జీలు (Uniform Tariff) కొనసాగించుటకు సహాయపడును. డిస్కంల మధ్య ఆస్తులు మరియు బాధ్యతల బదిలీ, PPA (విద్యుత్ కొనుగోలు కేటాయింపు) కు అనుగుణంగా ఉండే

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	-- స్పష్టమైన చట్టబద్ధ హామీలు లేకుండా ఈ భయాలను నిరాధారమని చెప్పలేము. ఇది ఉద్యోగుల విశ్వాసం, పారిశ్రామిక శాంతి మరియు విద్యుత్ రంగ స్థిరత్వాన్ని దెబ్బతీస్తుంది.	విధంగా మరియు మూడు డిస్కంల ఆర్థిక స్థిరత్వాన్ని పొందే విధంగా నిర్వహించబడుతుంది.
49.	-- నష్టాల ప్రమాణాలు మరియు బాధ్యత. 11 కెవి నెట్‌వర్క్‌ను ప్రస్తుతం ఉన్న విద్యుత్ పంపిణీ సంస్థలు నిర్వహిస్తున్న నేపథ్యంలో, వ్యవసాయ విద్యుత్ పంపిణీ సంస్థకు అల్ప వోల్టేజ్ స్థాయిలో శక్తి లెక్కింపు జరుగుతుంది. ఈ పరిస్థితిలో: • అధిక నష్టాలను ఎవరు భరిస్తారు? • ఆ నష్టాలను విద్యుత్ ఛార్జీలలో అనుమతిస్తారా లేదా అనే అంశంపై స్పష్టత లేదు. -- విద్యుత్ అంతరాయం, వోల్టేజ్ సమస్యలు మరియు అత్యవసర పరిస్థితుల్లో బాధ్యతలు స్పష్టంగా నిర్ధారించకపోతే ఫీల్డ్ స్థాయిలో గందరగోళం ఏర్పడి వ్యవస్థ విశ్వసనీయత దెబ్బతింటుంది.	లైసెన్స్ మంజూరు చేసిన వెంటనే బదిలీ చేయబడే డీటీఆర్‌లపై ట్రాన్స్‌ఫార్మర్ మానిటరింగ్ యూనిట్ల స్థాపనకు సంబంధించిన టెండర్ ప్రక్రియను TGRPDCL తక్షణమే ప్రారంభిస్తుందని తెలియజేస్తున్నాము. ట్రాన్స్‌ఫార్మర్ మానిటరింగ్ యూనిట్ల స్థాపన ప్రక్రియ పూర్తి అయ్యే వరకు, ప్రస్తుతం అమలులో ఉన్న ఇంధన లెక్కల విధానం (Energy Accounting Methodology) మరియు సబ్సిడీ గణన విధానాన్నే సంబంధిత ప్రస్తుత డిస్కంల సమన్వయంతో TGRPDCL కొనసాగిస్తుంది.

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Response to Telangana State Power Engineers Association		
50.	Justification and Public Interest in Formation of Rythu DISCOM The justification provided for creation of a Rythu DISCOM does not explain how establishing a separate entity will address the underlying financial issues of the gap between Average Billing Rate (ABR) and Average Cost of Service (ACS) existing in DISCOMs. The proposal doesn't clarify whether the subsidy burden will be reduced or merely shifted, thereby adding administrative complexity without resolving core issues. Further, agricultural consumers are already receiving reliable and free power supply under the existing framework and there is no additional benefit is envisaged with this proposal. The proposal does not provide any cost-benefit analysis or evidence of improved efficiency, service quality, or financial sustainability. Instead, it risks duplication of resources, fragmentation of operations, and regulatory complications.	TGRPDCL submits that the formation of a separate DISCOM for agricultural consumers is part of a broader structural reform aimed at improving service quality, transparency, and financial sustainability of the power sector. The objective is not merely to shift subsidy burden, but to enable better energy accounting, focused infrastructure development, and improved service quality for the agricultural segment. Further, as per G.O.Ms.No. 8 dated 08.05.2026, PPAs are allocated in a manner that ensures higher share of low-cost renewable energy to TGRPDCL and uniform tariffs across the State, thereby maintaining tariff stability and controlling subsidy requirements. Also, it is proposed for sharing the infrastructure assets and this will avoid duplication of network and improve efficiencies,
51.	Eligibility of TGRPDCL as Distribution Licensee under the Electricity Act, 2003 As per Section 2(17) and 2(19) of the Electricity Act 2003 which reads as follows, 2(17) - "Distribution licensee" means a licensee authorized to operate and maintain a distribution system for supplying electricity to the consumers in his area of supply.	TGRPDCL submits that the definition of distribution company as per Electricity Act 2003 does not preclude a distribution licensee from having network assets from DTR and associated downstream infrastructure.

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	2(19) - "Distribution system" means the system of wires and associated facilities between the delivery points on the transmission lines or the generating station connection and the point of connection to the installation of the consumers. In the present case, TGRPDCL is stated to have only agriculture DTRs and connected LT lines up to agricultural consumers, without any linkage to transmission or generating station interfaces. This raises a concern as to how it can qualify as a distribution licensee when it does not appear to operate a distribution system as defined under the Act, but only downstream assets from existing DISCOM infrastructure.	
52.	Inconsistency with Section 43 and Practical Enforcement Issues Under Section 43 of the Electricity Act, 2003: Every distribution licensee must supply electricity to any applicant within its area of supply without discrimination. Section 43 mandates that every distribution licensee shall, on application, supply electricity to any owner or occupier of premises within its area of supply. This Universal Supply Obligation (USO) is inherently area-based and ensures universal, non-discriminatory access to electricity. The proposed model of segregating consumers based on category (such as Agriculture, HMWSSB, Lift Irrigation & Mission Bhagiratha) rather than geographical area departs from this statutory framework.	The objective of USO is to ensure that no consumer is denied supply of power by the licensee. The mandate of TGRPDCL is to serve agricultural and allied services. All other categories of consumers would be served by the incumbent DISCOMs. Operation ADEs are empowered to book cases in instances of any theft or malpractices.

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	In particular, the proposal creates ambiguity regarding: • The manner in which the Universal Supply Obligation will be discharged by multiple category-based licensees operating within the same geographical area. • Accountability for providing supply to consumers within the same area. • Responsibility for network development, maintenance, and system strengthening. Further a serious practical concern arises in cases where an agricultural consumer utilizes electricity for non-agricultural purposes (such as commercial or domestic or industrial use). In the existing framework: • The same DISCOM has full authority to detect misuse, • Reclassify the consumer, and • Continue supply under the appropriate category with applicable tariff and penalties. However, under the proposed arrangement of Rythu DISCOM, • it is unclear: • Whether it can legally continue supply under a different category. • Whether supply must be disconnected and dismantled. • How other DISCOM would take over such consumer and how consumer has to switch over.	

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	How continuity of supply, billing, and enforcement would be ensured as Change of Category to such consumer is not possible in Rythu DISCOM. Hence, such category based segregation may dilute the statutory responsibility imposed under Section 43 and create ambiguity in consumer service obligations. In view of the above submissions, the TGRPDCL application for distribution license in its present form needs strict regulatory scrutiny.	
53.	Metering of Agriculture DTRs-Huge Financial burden As per G.O.Ms No.44 dt.17.12.2025 it is proposed to meter 5,22,479 agricultural DTRs by installation of Smart Meters on the LT side of Distribution Transformers (DTRs) to accurately account for the electricity consumption. The cost of smart meter installation per DTR is considered at Rs. 25,000, and the total cost of this metering will be Rs. 1,306 crore. As each DTR is considered an interface point, meters of higher accuracy are proposed to be installed. Agricultural DTRs are widely scattered across the nook and corners of the state. In many areas, there is no reliable network coverage, making smart meter communication unfeasible. In addition, field conditions pose significant operational constraints such as damage to meters and cables due to animals in agricultural fields, risk of cable burning or deterioration	Physical survey of agricultural DTRs has been taken up. Metering of DTRs would be taken up in a phased manner.

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	under harsh environmental conditions, and safety concerns for farmers due to exposed or open installations. Further, agricultural DTRs are provided with open wiring sets. It may also be noted that existing DISCOMs have already installed meters on sample agricultural DTRs under the ISI methodology and encountered the operational issues mentioned above. In such a scenario implementing large scale metering for 5 .22 lakh DTRs appears highly challenging. This may also result in a significant financial burden on the DISCOM, which would ultimately be passed on to consumers.	
54.	Concerns Over Indications of Pre-decided Implementation It has been reported in newspapers that the functioning of the proposed Rythu DISCOM will commence from 2nd June 2026. If proposed Rythu DISCOM becomes operational from 2nd June 2026, while interface metering is still not initiated, How will the input energy of the new DISCOM be accurately measured?. Further, • Without establishment of necessary operational mechanism which utility will attend to consumer complaints? • How the replacement of failed DTRs, restoration of supply, and emergency maintenance is done especially considering the critical nature of agricultural power supply? In view of the serious operational constraints and financial implications, it	In the interim till such time the metering of DTRs are taken up, the existing methodology of Energy accounting would continue. Agricultural consumption assessment would be as per the norms fixed by Hon'ble TGERC.

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	is respectfully submitted that: A pilot project for DTR metering may first be undertaken in one division or circle with exclusive supervisory mechanism and its performance, reliability, and field challenges may be comprehensively evaluated before any large-scale rollout. Until the feasibility and effectiveness of such metering are clearly established, and all operational mechanisms are transparently defined, the immediate operationalization of the Rythu DISCOM needs reconsideration.	
55.	Threat of Privatization of DISCOMs It is to submit that high-paying consumers like commercial & industrial along with Domestic categories are to remain with the existing DISCOMs, while Agricultural consumers are to be shifted to a new DISCOM. This will change the present consumer mix of the incumbent DISCOMs. After transferring of Agriculture consumers, the existing DISCOMs will mainly serve regular paying categories. This will make more attractive for privatization of existing DISCOMs. Employees are seriously concerned that creating a separate DISCOM for Agriculture consumers may become a first step towards privatization or reduction of government control over the existing DISCOMs in future. This proposal creates fear among employees about job security and future	TGRPDCL submits that the issue raised by the objector needs to be viewed from wider ambit of reforms aimed at improving the service quality and financial sustainability of DISCOMs. It may be noted that the formation of a new licensee to exclusively serve agricultural and allied consumers is a transformative step in the protracted reforms journey which the power sector has been witnessing since 2003. The guiding principle of this reformative measure is to ensure quality and reliable power supply to the consumer categories and to progressively improve the financial position of DISCOMs and does not indicate any move towards privatization.

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	service conditions.	
56.	Manpower deployment: It is proposed to deploy 2000 employees to TGRPDCL. Among them, field staff is only 1000. As per the proposal of designation-wise posts for the Rythu DISCOM, 194 teams of O&M staff (JLM/ALM/LM) have to manage around 5.22 lakhs of DTRs and LT line of 2,61,240 KM, which raises serious concerns from an operational feasibility standpoint. Based on the stated deployment, each O&M team would be responsible for approximately 2700 Distribution Transformers (DTRs) and about 1350 circuit kilometres of LT/Agricultural (AGL) lines. In practical terms, for agriculture-intensive networks, this represents an exceptionally high workload. These lines are widely spread in remote areas and are prone to frequent faults due to vegetation contact and weather impacts. Faults are often scattered across remote villages, significantly increasing travel time for repair crews. As a result, restoration work depends not only on manpower availability but also on geographical accessibility and response logistics. In such a scenario, assigning around 2700 DTRs per field team makes it practically difficult to maintain acceptable service reliability standards or ensure timely grievance redressal. As such, the current manpower-to-asset ratio for O&M functions poses a high risk of operational stress.	TGRPDCL submits that the proposed staffing plan has been proposed after considering the spread of agricultural consumers,. The structure proposed in the G.O.Ms.No.44, dated 17.12.2025 is the preliminary indication of manpower requirement, The 1,000 O&M staff and artisans will be allocated based on actual field requirements, Additional staff would be taken based on need to ensure service quality as per Standards of Performance.

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57.	Protection of Employee Interests The proposal places thousands of employees in a state of serious uncertainty, with no legally binding assurances on critical service matters such as service conditions, seniority, promotions, pension, provident fund and gratuity, medical benefits, etc. Employees needs explicit statutory safeguards in the form of Tripartite Agreement in consultation with Associations/Unions.	A comprehensive Employee Options Portal has been launched for the employees to give their choice. The criteria/ guidelines has been uploaded on TGRPDCL website and has been shared with the employees. All existing service benefits and service conditions in parent utilities are continued in TGRPDCL. The rules and regulations are also continued on par with parent utilities.
58.	Complete Dependence On Government Subsidy TG RPDCL is structured to cater predominantly to highly subsidized or zero tariff consumer categories, resulting in negligible internal revenue generation and an inherent dependence on continuous Government subsidy support. Such a model exposes the utility to significant financial vulnerability, as any delay or shortfall in subsidy disbursement would directly impair its ability to meet power purchases, operational expenses, including employee benefits.	As per the amendment issued vide G.O.Ms.No. 8 dated 08.05.2026, the allocation of PPAs among TGRPDCL, TGSPDCL and TGNPDCL shall be undertaken in a manner that ensures a higher share of renewable energy to TGRPDCL, while maintaining uniform retail tariffs across the State. This approach ensures that the overall subsidy requirement for TGRPDCL remains controlled. The proposed mechanism ensures financial viability of all DISCOMs.
59.	PPA allocation, Cross-Subsidy, Tariff Principles, and financial viability The existing PPAs are proposed to be shared among the existing DISCOMs and new DISCOM based on the share of energy handling. Under Sections 61 and 62 of the Electricity Act 2003 tariff determination is required to progressively reflect the cost of supply, while also recognizing	As per the amendment issued vide G.O.Ms.No. 8 dated 08.05.2026, the allocation of PPAs among TGRPDCL, TGSPDCL and TGNPDCL shall be undertaken in a manner that ensures a higher share of renewable energy to TGRPDCL, while maintaining uniform retail tariffs across the State.

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	cross-subsidy limits. The proposed segregation of subsidised consumer categories into a separate DISCOM may remove cross-subsidy burden from high-paying consumers while, it does not reduce the actual cost of supply. In the absence of cross-subsidy, such costs can only be recovered either through substantial tariff revision for subsidised consumers or through explicit Government subsidy. Further, with exclusion of subsidised Agriculture consumers from the incumbent DISCOMs the tariff of the subsidizing consumers needs to be revised resulting in financial implications.	This approach ensures that the overall subsidy requirement for TGRPDCL remains controlled, while also maintaining tariff stability for all consumer categories. Further, as per the prevailing legal and regulatory framework, cross-subsidy is to be reduced progressively, and the proposed mechanism aligns with this principle while ensuring financial viability of all DISCOMs.
60.	Concerns on Interface Meters for Energy Accounting and Settlement: The proposal does not clearly explain how energy will be measured and accounted or how settlements between the DISCOMs will be done. It suggests using about 5.2 lakh interface meters for settlement between DISCOMs, but it is not clear how such a large number of meters will actually be used to calculate accurate power drawl every month. These meter readings will have to be collected, processed, and analysed properly to arrive at the exact electricity usage and accountability of the Rythu DISCOM. However, earlier experience shows that metering of transformers has faced technical and operational problems, including communication failures and measurement inaccuracies. Because of this, relying on such a	TGRPDCL submits that implementation of DTR metering for energy accounting will be carried out in a phased and systematic manner. Upon grant of license, tenders will be initiated for installation of Transformer Monitoring Units along with necessary communication infrastructure, MDMS integration, and maintenance provisions to ensure reliable data collection and processing. Until full deployment is achieved, existing energy accounting and settlement mechanisms will continue in coordination with the Commission and incumbent DISCOMs.

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	large number of meters as interfacing point between the three Discerns may not give reliable results.																											
61.	Financial Viability Concerns and Sectoral Risks in the Proposed Structuring of TGRPDCL <table border="1"> <thead> <tr> <th>Details</th><th colspan="2">TGRPDCL</th></tr> </thead> <tbody> <tr> <td rowspan="2">Consumers</td><td>Agl (No)</td><td>2905779</td></tr> <tr> <td>Others (No)</td><td>2359</td></tr> </tbody> </table> <table border="1"> <tbody> <tr> <td>DTRs</td><td>Agl (No)</td><td>522479</td></tr> <tr> <td></td><td>LT Line (ckm)</td><td>261240</td></tr> <tr> <td>Energy Requirement</td><td>Percentage</td><td>42%</td></tr> <tr> <td>Arrears</td><td>Rs in Cr</td><td>35982</td></tr> <tr> <td>Liabilities</td><td>Rs in Cr</td><td>26950</td></tr> <tr> <td>Working capital loan</td><td>Rs in Cr</td><td>9042</td></tr> </tbody> </table> The data clearly demonstrates that TGRPDCL is overwhelmingly structured to serve 29,05,779 agricultural consumers out of a total of 29,08,138 consumers, meaning that approximately 99.2% of its consumer base falls under the agricultural (AGL) category, leaving only a negligible 0.8% under other paying categories. This highly skewed consumer mix establishes that TGRPDCL will have virtually no revenue-generating base, as agricultural supply is free, thereby making the entity inherently financially dependent.	Details	TGRPDCL		Consumers	Agl (No)	2905779	Others (No)	2359	DTRs	Agl (No)	522479		LT Line (ckm)	261240	Energy Requirement	Percentage	42%	Arrears	Rs in Cr	35982	Liabilities	Rs in Cr	26950	Working capital loan	Rs in Cr	9042	TGRPDCL submits that the revenue gap will be met through timely government subsidy releases. While TGRPDCL serves subsidised consumer categories, the GoTG has committed to ensuring timely subsidy releases to maintain financial viability. Section 65 of the Electricity Act, 2003 mandates that subsidy must be paid in advance. The allocation of assets, liabilities, and power procurement is being undertaken in a structured manner to ensure overall financial sustainability of all DISCOMs.
Details	TGRPDCL																											
Consumers	Agl (No)	2905779																										
	Others (No)	2359																										
DTRs	Agl (No)	522479																										
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	Compounding this TGRPDCL is proposed to take on substantial financial burden such as arrears receivable from Govt. departments of 35,982 crore, liabilities/ payable to state GENCO of 26,950 crore including working capital loans of ~9,042 crore. This effectively transfers financial stress not only onto the new entity but also risks cascading the burden onto the TG GENCO, thereby weakening the overall financial health of the power sector.	
Response to Telangana State Electricity SC&ST Employees Welfare Association		
62.	1. Protection of Rule of Reservation (ROR), Consequential Seniority and Constitutional Safeguards As per the guidelines issued for TGRPDCL, inter-se seniority of employees appointed by transfer is proposed to be determined based on: • Date of promotion to the same cadre in parent organization, • Total length of service, • Date of birth. While the said guideline attempts to regulate inter-se seniority after transfer, we respectfully submit that fixation of seniority, particularly in matters concerning: • Direct Recruitment, • Promotions, • Appointment by transfer,	All existing service benefits and service conditions in parent utilities are continued in TGRPDCL. The rules and regulations are also continued on par with parent utilities.

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	• Integrated seniority lists, • Future promotional avenues, must strictly comply with Rule 33 of Telangana State & Subordinate Service Rules, 1996, by implementing Merit-cum-Roster principles under Rule of Reservation. The Rule of Reservation is not merely an administrative arrangement but a constitutional safeguard intended to ensure adequate representation of Scheduled Castes and Scheduled Tribes in public employment. We further submit that consequential seniority for SC/ST employees shall necessarily be implemented wherever representation is inadequate, in accordance with: • GO Ms.No.5, • GO Ms.No.26, • 85th Constitutional Amendment, • Judgments governing consequential seniority. Once adequacy of representation is achieved, i.e., 15% for SCs and 10% for STs, promotions may thereafter be regulated under General Seniority in accordance with GO Ms.No.2. It is further submitted that all actions concerning restructuring, integration, promotions and seniority shall strictly comply with the interim orders passed by the Hon'ble High Court in WP No.22484 of 2024 and connected cases. Further, Local and Non-Local status of employees shall be	

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	meticulously verified while preparing integrated seniority lists so as to avoid future constitutional and service-related disputes. We also submit that the following proceedings/orders shall not be relied upon for determination of seniority: • T.O.O Ms.No.954/2021, • T.G.O.O No.62/2021, • SP.O.O Ms.No.101/2021, • N.O.O Ms.No.37/2021. Any deviation from reservation roster principles and constitutional safeguards may result in irreparable injustice to SC/ST employees and lead to prolonged litigation affecting the entire restructuring process.	
63.	2. Necessity of Comprehensive Tripartite Agreement Before Restructuring We strongly request that before implementation of restructuring or transfer of employees to TGRPDCL, a legally enforceable Tripartite Agreement shall be executed between: • Government, • Existing Power Utilities, • Employee Associations/Unions. The proposed agreement shall comprehensively safeguard: • Existing service conditions, • Pay protection, • Pensionary benefits,	All existing service benefits and service conditions in parent utilities are continued in TGRPDCL. The rules and regulations are also continued on par with parent utilities.

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	• Promotional avenues, • Reservation implementation, • Seniority protection, • Career progression, • Leave benefits, • Transfer liabilities, • Continuity of service, • Existing statutory protections. The same may be modeled on the protections extended during the unbundling of APSEB into APTRANSCO, APGENCO and APDISCOMs, where employee interests were protected comprehensively. Without such a Tripartite Agreement, employees will be exposed to uncertainty, administrative discrimination, service disputes and long-term litigation.	
64.	3. Financial Sustainability and Cross-Subsidy Concerns: Under Sections 61 and 62 of the Electricity Act, tariff determination must progressively reflect cost of supply while recognizing permissible cross-subsidy mechanisms. The present proposal effectively segregates subsidized consumer categories into TGRPDCL while retaining high-paying industrial and commercial consumers with incumbent DISCOMs. Such segregation removes the internal cross-subsidy balancing mechanism presently sustaining the power sector.	As per the GO amendment G.O.Ms.No.8 dated 08.05.2026, allocation of PPAs between the three Distribution companies of Telangana namely TGRPDCL, TGSPDCL and TGNPDCL shall be done in such a manner that a higher share of Renewable Energy is allotted to TGRPDCL which helps reduce its overall cost of supply and category wise uniform tariff is maintained across the State.

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	Though the burden of subsidized consumers may appear to be shifted administratively, the actual cost of supply does not reduce. In absence of cross-subsidy, such expenditure can only be met through: • Massive tariff revision, • Continuous Government subsidy support, • Borrowings, • Accumulation of liabilities. A DISCOM serving predominantly subsidized consumers will have no independent revenue buffer and will become entirely dependent on timely Government subsidy releases. Any delay in subsidy release will directly impact: • Power purchase payments, • Payment to generators, • Employee salaries, • System maintenance, • Capital expenditure, • Statutory obligations, • Consumer services. The proposed structure therefore creates a financially vulnerable utility from inception itself.	TGRPDCL submits that while it serves subsidised consumer categories, there would be timely subsidy support from GoTG. Section 65 of the Electricity Act, 2003 mandates that subsidy must be paid in advance.

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65.	4. Mandatory Advance Subsidy under Section 65 of Electricity Act Section 65 of the Electricity Act, 2003 specifically mandates that Government subsidy shall be paid in advance to compensate the distribution licensee. However, past experience demonstrates that advance subsidy releases are frequently delayed. In absence of: • Time-bound subsidy release mechanism, • Advance payment guarantees, • Statutory financial protection, TGRPDCL may become operationally unstable and financially unsustainable. The Association therefore requests that no restructuring be implemented without a legally enforceable subsidy assurance mechanism.	TGRPDCL submits that while it serves subsidised consumer categories, there would be timely subsidy support from GoTG. Section 65 of the Electricity Act, 2003 mandates that subsidy must be paid in advance.
66.	5. Universal Service Obligation under Section 43: While Section 14 of the Electricity Act permits multiple distribution licensees, Section 43 imposes a mandatory universal supply obligation. The Electricity Act fundamentally envisages area-based licensing. The proposed consumer-category-based segregation raises serious legal and practical concerns.	Universal supply obligation has been mandated in Electricity Act 2003, in order to ensure no consumer is denied power supply by a Distribution licensee, citing remote conditions or infeasibility in supply of power or commercial un-attractiveness in extending power supply. USO specifically safeguards the interest of consumers in the above scenario and discourages licensees in cherry picking commercially attractive consumer categories such

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	Agriculture consumers and water supply consumers are essential public utility categories requiring uninterrupted service. The proposal does not clearly specify: • How TGRPDCL independently proposes to discharge universal supply obligations, • Responsibility during emergencies, • Operational coordination mechanisms, • Supplier-of-last-resort arrangements. In absence of clear statutory responsibility, public interest and continuity of essential services may be adversely affected.	as – Industrial and Commercial categories. TGRPDCL submits all inter-DISCOM arrangements will be clearly defined through formal Service Level Agreements (SLAs) with TGSPDCL and TGNPDCL. These agreements will specify roles, fault response timelines, maintenance responsibility, grievance handling, and accountability mechanisms. TGRPDCL will remain the single point of responsibility for consumers under its jurisdiction, with clear operational coordination in place.
67.	6. Serious Apprehensions Regarding Future Privatization: As reflected in Table-6 of G.O.Ms.No.44, high-paying industrial and commercial consumers are proposed to remain with incumbent DISCOMs while subsidized categories are transferred to TGRPDCL. This restructuring significantly changes the consumer mix of existing DISCOMs and may render them commercially attractive to private sector participation in future. Employees across the sector therefore apprehend that the formation of TGRPDCL may eventually function as a precursor to privatization or dilution of public ownership of incumbent DISCOMs.	TGRPDCL submits that the issue raised by the objector needs to be viewed from wider ambit of reforms aimed at improving the service quality and financial sustainability of DISCOMs. It may be noted that the formation of a new licensee to exclusively serve agricultural and allied consumers is a transformative step in the protracted reforms journey which the power sector has been witnessing since 2003. The guiding principle of this reformative measure is to ensure quality and reliable power supply to the consumer categories and to progressively improve the financial position of DISCOMs and does not indicate any move towards privatization.

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	Unless the Government provides explicit statutory safeguards against privatization, such apprehensions will continue to: • Affect employee morale, • Disturb industrial harmony, • Reduce confidence among workforce, • Affect long-term sector stability.	
68.	7. Allocation of Government Arrears and Generator Dues: As per Table-9 of G.O.Ms.No.44, substantial liabilities including Government arrears and dues payable to GENCOs are proposed to be allocated to TGRPDCL. Such disproportionate liability allocation will make the proposed utility financially weak from inception itself. Since TGRPDCL will depend heavily on Government subsidy support, any delay in reimbursement may severely affect payment capacity to GENCOs, thereby creating cascading financial stress across the power sector.	The allocation of assets, liabilities, and power procurement is being undertaken in a structured manner to ensure overall financial sustainability of all DISCOMs.
69.	8. Severe Operational Impracticability and O&M Staff Shortage: The proposal envisages transfer/deputation of only around 1,000 O&M personnel for maintenance of: • More than five lakh Distribution Transformers, • Vast agricultural LT networks, • Rural distribution infrastructure,	The structure proposed in the G.O.Ms.No.44, dated 17.12.2025 is a preliminary requirement. The 1,000 O&M staff and artisans will be allocated based on actual field requirements; Additional deployment of staff would be looked at based on need. .

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	• Remote field operations. Such deployment is practically impossible. Already, in existing DISCOMs: • Many substations are functioning with skeletal staff, • Existing employees are working 12–24 hour duties, • Two employees are handling work meant for four persons, • Large number of vacancies remain unfilled. Further depletion of manpower without fresh recruitment will create unbearable work burden. It is estimated that roughly one O&M employee may be required to manage nearly two mandals, which is beyond operational feasibility. This will adversely affect: • Consumer service quality, • Breakdown restoration, • Emergency response, • Preventive maintenance, • Reliability of supply, • Employee health and safety.	
70.	9. Inter-Se Seniority Complications and Litigation Risks Permanent transfer of employees from:	All existing service benefits and service conditions in parent utilities are continued in TGRPDCL.

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	• TGTRANSCO, • TGGENCO, • TGSPDCL, • TGNPDCL, into a newly created utility will create enormous complexity in: • Inter-se seniority, • Reservation roster integration, • Promotion channels, • Local/Non-local status, • Career progression. Such issues are highly prone to prolonged litigation and administrative disputes.	The rules and regulations are also continued on par with parent utilities.
71.	10. Out-of-Turn Promotions and Violation of Equality Principles The proposal reportedly offering out-of-turn promotions to employees opting for TGRPDCL is contrary to: • Existing service rules, • Fundamental principles of equality, • Seniority norms. If juniors bypass seniors for promotion merely due to transfer, it will create: • Serious service disputes, • Loss of employee morale,	Incentive promotion is announced for the Employees opted to work in TGRPDCL in the G.O. MS. No. 44. The promotions are being considered after Appointment By Transfer to TGRPDCL, based on inter-se-seniority in RPDCL.

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	• Administrative dissatisfaction, • Legal challenges, • Breakdown of institutional discipline.	
72.	11. Energy Accounting, Metering and Settlement Issues The proposal lacks clarity regarding: • Feeder-wise accounting, • DTR-wise accounting, • Consumer-wise accounting, • Inter-DISCOM settlement, • Interface metering. Earlier attempts of agricultural transformer metering faced serious technical and communication constraints. Reliance upon inaccurate accounting methodologies may create disputes during: • ARR proceedings, • True-up exercises, • Tariff fixation, • Power purchase cost allocation.	TGRPDCL submits that implementation of Transformer monitoring for energy accounting will be carried out in a phased and systematic manner. Upon grant of licence, tenders will be initiated for installation along with necessary communication infrastructure, and maintenance provisions to ensure reliable data collection and processing. Until full deployment is achieved, existing energy accounting and settlement mechanisms will continue in coordination with the Commission and incumbent DISCOMs.
73.	12. Power Purchase Cost Allocation during Peak Demand During peak demand hours, power purchase cost becomes significantly high. The proposal relying upon approximately 5.3 lakh AGL interface meters for	As per the latest GO, G.O.Ms.No.8 dated 08.05.2026, the allocation of PPAs between the three Distribution companies of Telangana namely TGRPDCL, TGSPDCL and TGNPDCL shall be done in such a manner that a higher share of Renewable Energy is

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	D-D settlement raises serious concerns regarding: • Accuracy, • Auditability, • Reliability, • Cost attribution. Any ambiguity in allocation of power purchase cost may lead to serious disputes before regulatory authorities.	allotted to TGRPDCL since the demand profile of consumers transferred to TGRPDCL also aligns with the generation pattern of Renewable Energy sources there by reducing dependency on market purchases during peak hours. It may also be noted that allocation of hydro plants will enable in meeting the LIS requirements. Any remaining requirement will be met through, through D-to-D purchases , banking arrangements.
74.	13. Loss Norms and Accountability Issues Energy input to TGRPDCL is proposed to be accounted at LT level while 11 KV infrastructure remains under incumbent DISCOMs. However, the proposal does not clearly specify: • Responsibility for excess technical losses, • Commercial loss accountability, • Treatment of excess losses, • Pass-through eligibility. Without clear accountability, tariff determination and true-up proceedings may become legally unsustainable.	TGRPDCL submits that the proposed framework provides for clear demarcation of loss accountability between the DISCOMs. Accounting of losses would be as per the voltage-wise losses approved by TGERC. Any deviations would be dealt as per the regulatory framework.
75.	14. Operational Control, Outages and Emergency Restoration The proposal does not clearly demarcate responsibility during: • Outages, • Voltage fluctuations,	TGRPDCL submits that the three-DISCOM structure has been established within the framework of the Electricity Act, 2003. During the transition period, operational coordination and Emergency outage response among the three DISCOMs will be

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	• Transformer failures, • Emergency restoration, • Grid contingencies, • Essential service interruptions. Absence of clarity may create dangerous confusion at field level and adversely affect reliability of public supply.	ensured through Inter DISCOM coordination, coordination with TGSLDC, and the metering and interface arrangements notified in G.O.Ms.No.44 dated 17.12.2025. Detailed guidelines for O&M coordination, delineating responsibilities between DISCOMs for network maintenance will be developed in due course. .
76.	15. Recovery of True-Up Costs: In a DISCOM predominantly serving subsidized consumers, recovery of true-up costs through tariff is practically difficult. In absence of cross-subsidy support, such liabilities may accumulate as regulatory assets causing long-term financial instability.	As per the GO amendment G.O.Ms.No.8 dated 08.05.2026, the allocation of PPAs between the three Distribution companies of Telangana namely TGRPDCL, TGSPDCL and TGNPDCL shall be done in such a manner that a higher share of Renewable Energy is allotted to TGRPDCL and category wise uniform tariff is maintained across the State. This will ensure that subsidy requirement for TGRPDCL doesn't increase and cost recovery remains manageable without excessive accumulation of regulatory assets.
77.	16. Employees from TRANSCO and GENCO Lack Distribution Experience: Employees permanently absorbed from TGTRANSCO and TGGENCO may not possess practical field-level distribution experience required for large-scale rural distribution management. Without proper staffing pattern and adequate experienced field personnel, operational efficiency of TGRPDCL may suffer seriously.	TGRPDCL submits that the staff proposed from TGTRANSCO and TGGENCO are qualified electrical engineers and have adequate experience in power sector they are in a best position to manage and operate the network. They will receive the necessary training on need basis wrt distribution business before taking up their duties and will work under proper guidance to ensure smooth operation.

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78.	17. Adverse Impact on Existing DISCOM Employees If vacancies are suppressed and manpower is diverted without fresh recruitment: • Existing employees will lose promotional opportunities, • Work burden will increase, • Employee stress levels will rise, • Service delivery standards may deteriorate, • Consumer grievances may increase. This may ultimately affect the objective of providing quality uninterrupted power supply.	TGRPDCL submits that the proposed staffing plan has been proposed as per G.O.Ms.No.44, dated 17.12.2025. The 1,000 O&M staff and artisans will be allocated based on actual field requirements, The staffing details mentioned are preliminary requirements.
79.	18. Request for Immediate Intervention and Reconsideration: In view of the above serious constitutional, legal, financial, operational and employee-related concerns, we humbly request that: 1. Rule of Reservation and consequential seniority shall be implemented strictly. 2. A comprehensive Tripartite Agreement shall be executed before restructuring. 3. Existing service conditions and promotional avenues shall be fully protected. 4. Adequate staffing and fresh recruitment shall be ensured. 5. Financial sustainability of TGRPDCL shall be reassessed	The replies to the objections are covered in the earlier responses

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	comprehensively. 6. Clear safeguards against privatization shall be issued. 7. All employee associations and stakeholders shall be consulted transparently. 8. No employee shall be subjected to discrimination or loss of service benefits. 9. Legal and operational feasibility of the proposal shall be re-examined comprehensively before implementation.	
Response to Telangana Power Diploma Engineers Association (TPDEA)		
80.	1. Cross-Subsidy, Tariff Principles, and Financial Viability Under Sections 61 and 62 of the Electricity Act, 2003, tariff determination is required to progressively reflect the cost of supply, while also recognizing cross-subsidy within permissible limits. The proposed segregation of subsidized consumer categories into a separate DISCOM may remove cross-subsidy burden from high-paying consumers while, it does not reduce the actual cost of supply. In the absence of cross-subsidy, such costs can only be recovered either through substantial tariff revision for subsidized consumers or through explicit Government subsidy. A DISCOM catering exclusively to subsidized consumers will have no internal revenue buffer and will be entirely dependent on timely and	TGRPDCL submits that the proposed restructuring is designed to ensure financial stability and sustainability of all 3 DISCOMs. As per the existing legal and regulatory framework, cross-subsidy is to be reduced progressively. The allocation of higher share of low-cost renewable energy to TGRPDCL helps moderate cost of supply, ensuring that uniform tariff across the state TGRPDCL's revenue gap will be addressed through timely subsidy support, ensuring continuity of operations and discharge of statutory obligations.

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	assured subsidy releases. Any delay or shortfall in subsidy payments will directly affect power purchase obligations, system maintenance, payment of employee salaries and statutory dues. APTEL has consistently held that financial viability of a distribution licensee is a prerequisite for effective discharge of statutory obligations.	
81.	2. Mandatory Advance Subsidy under Section 65 Section 65 of the Electricity Act, 2003 mandates that any subsidy directed by the State Government shall be paid in advance to the distribution licensee to compensate for the tariff determined by the Commission. Past experience demonstrates that advance and full subsidy payments have not been consistently ensured. In the absence of time-bound, and advance subsidy mechanism, the proposed Third DISCOM with subsidised categories will remain financially vulnerable, contrary to the provisions of the Act and settled APTEL rulings emphasising certainty of revenue streams.	TGRPDCL submits that while it serves subsidised consumer categories, the GoTG has committed to ensuring timely subsidy releases to maintain financial viability. Section 65 of the Electricity Act, 2003 mandates that subsidy must be paid in advance,.
82.	3. Universal Service Obligation under Section 43 While Section 14 of the Act permits multiple distribution licensees in the same area, Section 43 imposes a mandatory and non-negotiable Universal Supply Obligation on every distribution licensee. The Electricity Act envisages area-based licensing. Consumer-category-	Universal supply obligation has been mandated in Electricity Act 2003, in order to ensure no consumer is denied power supply by a Distribution licensee, citing remote conditions or infeasibility in supply of power or commercial un-attractiveness in extending power supply. USO specifically safeguards the interest of consumers in the above scenario and discourages licensees in

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	based segregation raises serious legal concerns regarding discharge of the universal service obligation, particularly in respect of agriculture and water supply consumers. APTEL has consistently held that restructuring cannot dilute, fragment, or shift statutory obligations. The proposed model lacks clarity on how the Third DISCOM will independently and effectively discharge its universal supply obligation.	cherry picking commercially attractive consumer categories such as – Industrial and Commercial categories. TGRPDCL will operate in accordance with licensee conditions notified by the Hon'ble Commission.
83.	4. Privatization of Incumbent Discoms As reflected in Table-6 of G.O.Ms.No. 44, high-paying consumer categories such as commercial and industrial consumers are proposed to remain with the incumbent DISCOMs, while subsidised consumer categories are to be segregated into a separate entity. Further, the energy requirement of TGNPDCL constitutes only about 13% of the total State energy requirement. This restructuring will substantially alter the consumer mix of the incumbent DISCOMs, rendering them predominantly high-revenue and commercially attractive utilities. Such a configuration is likely to enhance the attractiveness of the incumbent DISCOMs to private sector particularly in the absence of cross-subsidy and social service obligations. In this context, employees have expressed serious apprehension that the proposed formation of a Third DISCOM catering exclusively to subsidised	TGRPDCL submits that the issue raised by the objector needs to be viewed from wider ambit of reforms aimed at improving the service quality and financial sustainability of DISCOMs. It may be noted that the formation of a new licensee to exclusively serve agricultural and allied consumers is a transformative step in the protracted reforms journey which the power sector has been witnessing since 2003. The guiding principle of this reformative measure is to ensure quality and reliable power supply to the consumer categories and to progressively improve the financial position of DISCOMs and does not indicate any move towards privatization.

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	consumers may operate as a precursor to future privatisation or dilution of public ownership of the incumbent DISCOMs. In the absence of explicit, binding policy assurances and statutory safeguards such apprehensions cannot be treated as unfounded and are likely to adversely affect employee confidence, industrial harmony, and long-term sector stability.	
84.	5. Allocation of the Arrears from the Govt & Dues payable to Generators to Third DISCOM It is observed from the table 9 of the G.O. Ms 44 dated 17.12.2025 that major liabilities, including Arrears from Government & Dues payable to GENCOs, are proposed to be transferred entirely to the proposed Third DISCOM. Such an arrangement would impose a disproportionate financial burden on the Third DISCOM from its inception and render it a loss-bearing entity. In the absence of adequate independent revenue sources, the Third DISCOM will be dependent solely on Government payments to meet its obligations. Any delay in receipt of Government dues would severely affect its capacity to discharge payments to GENCOs, thereby adversely impacting their financial stability as well. This mechanism may lead to a cascading financial stress on both the Third DISCOM and the GENCOs.	The key sources of revenue for TGRPDCL would be timely subsidy support, revenue collections from LIS, CPWS, HMWSSB categories.
85.	6. Supplier of Last Resort and Continuity of Supply The proposal does not clarify the mechanism for ensuring continuity of	TGRPDCL submits that it will ensure continuous and reliable power supply to all consumers under its jurisdiction, including

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	supply to essential services in the event of operational failure, financial distress, or inability of the Third DISCOM to supply power. Absence of a clearly defined Supplier of Last Resort mechanism poses a serious statutory and public interest risk. APTEL has repeatedly emphasised that continuity of supply, particularly for essential services, cannot be left uncertain in restructuring exercises.	essential services, in line with statutory obligations. The proposed framework will include clear operational protocols and contingency arrangements to address any situation of operational failure or financial distress, ensuring that supply is not interrupted.
86.	7. Distribution Network Ownership and Operational Accountability In a scenario where multiple DISCOMs operate in the same geographical area, statutory and regulatory clarity is required regarding: • Ownership of distribution assets such as DTRs, LT lines, and interface meters, • Operation and maintenance responsibility, • fault rectification authority, and • Dispute resolution mechanisms. The proposal envisages deputation/transfer of only about 1,000 Operation & Maintenance (O&M) personnel, resulting in an unworkable workload of approximately 522 Distribution Transformers (DTRs) and about 261 circuit kilometres of Agricultural LT lines for each O&M employee. Given that Agriculture networks are predominantly rural and remote with higher fault incidence, such deployment is operationally not workable. APTEL has held that restructuring must be operationally viable and not	TGRPDCL submits that all inter-DISCOM arrangements will be clearly defined through formal Service Level Agreements (SLAs) with TGSPDCL and TGNPDCL. These agreements will specify roles, fault response timelines, maintenance responsibility, grievance handling, and accountability mechanisms. TGRPDCL will remain the single point of responsibility for consumers under its jurisdiction, with clear operational coordination in place. The SLAs will be placed before the Commission, ensuring full clarity, enforceability, and accountability. The restructuring involves planned and balanced deployment of manpower, ensuring that both TGRPDCL and existing DISCOMs have adequate staff to perform their respective functions effectively.

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	merely administratively expedient.	
87.	8. Energy Accounting, Metering, and Settlement The proposal lacks clarity regarding feeder-wise, DTR-wise, and consumer-wise energy accounting, as well as inter-DISCOM settlement mechanisms subject to Commission approval. Earlier attempts of metering Agriculture Transformers have failed due to technical, operational, and communication constraints. The presently adopted ISI methodology is itself subject to inaccuracies. APTEL has consistently emphasised that regulatory approvals, tariff determination, and true-up exercises must be based on verifiable and reliable energy data. Absence of such data renders the proposed structure legally and regulatory vulnerable.	TGRPDCL submits that implementation of Transformer monitoring for energy accounting will be carried out in a phased and systematic manner. Upon grant of license, tenders will be initiated for installation along with necessary communication infrastructure, and maintenance provisions to ensure reliable data collection and processing. Until full deployment is achieved, existing energy accounting and settlement mechanisms will continue in coordination with incumbent DISCOMs.
88.	9. Power Purchase Cost Allocation During peak hours, when marginal power purchase costs are extremely high, accurate attribution of drawl to the Third DISCOM becomes critical. The proposed reliance on approximately 5 .3 lakh AGL interface meters for D-D settlement raises serious concerns regarding accuracy and auditability. Any ambiguity in power purchase cost allocation is likely to result in disputes during ARR and true-up proceedings.	As per the latest GO, G.O.Ms.No.8 dated 08.05.2026, the allocation of PPAs between the three Distribution companies of Telangana namely TGRPDCL, TGSPDCL and TGNPDCL shall be done in such a manner that a higher share of Renewable Energy is allotted to TGRPDCL since the demand profile of consumers transferred to TGRPDCL also aligns with the generation pattern of Renewable Energy sources there by reducing dependency on market purchases during peak hours. It may also be noted that hydro plants are also allocated to TGRPDCL. This will enable in

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		meeting the LIS requirements. Any remaining requirement will be met through, through D-to-D purchases banking arrangements.
89.	10. Loss Norms and Risk Allocation Energy input to the Third DISCOM is accounted at the LT voltage level using normative loss parameters, while the 11 kV distribution network is owned, operated, and maintained by the incumbent DISCOM. In such a scenario, where actual losses at the 11 kV level exceed the loss levels approved by the Hon'ble TGERC, in such scenario: • Which distribution licensee shall bear such excess losses, and • Whether such losses shall be treated as a pass-through in tariff or be disallowed. In the absence of such clarity, loss accountability becomes diffused between entities, rendering tariff determination and true-up proceedings legally unsustainable. The Hon'ble Appellate Tribunal for Electricity has consistently held that loss accountability must be clearly and definitively assigned and cannot be shared or ambiguously attributed among multiple licensees.	TGRPDCL submits that the proposed framework provides for clear demarcation of loss accountability between the DISCOMs. Voltage-wise losses approved by Hon'ble TGERC would be considered and deviations would be accounted for as per the regulatory provisions
90.	11. Operational Control and Emergency Response Operational responsibility during outages, voltage issues, system contingencies, and emergency restoration must be clearly demarcated. Absence of such clarity due to third DISCOM will result in field-level	TGRPDCL submits that the three-DISCOM structure has been established within the framework of the Electricity Act, 2003. During the transition period, operational coordination and Emergency outage response among the three DISCOMs will be

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	confusion and compromise system reliability, particularly for essential services.	ensured through Inter DISCOM coordination, coordination with TGSLDC, and the metering and interface arrangements notified in G.O.Ms.No.44 dated 17.12.2025. Detailed guidelines for O&M coordination, delineating responsibilities between DISCOMs for network maintenance will be included in the business plan submission.
91.	12. Employee Service Conditions APTEL has consistently recognized that restructuring should not adversely affect service conditions, career progression, or legitimate expectations of employees. The proposal simultaneously offers promotions as an incentive for transfer while abolishing posts vacated in the incumbent DISCOMs. These provisions are mutually contradictory and undermine employee confidence, making the proposal vulnerable to service-related disputes. The proposal of transferring Engineers and Staff on permanent basis from TRANSCO, GENCO & DISCOMs will create confusion. Particularly fixing of inter-se-seniority among them will be very difficult task and finally ends up in litigation & legal tussles. Further to the above, the employees working in TGTRANSCO and TG GENCO, who will be permanently absorbed into new TGRPDCL doesn't have experience or expertise in distribution front, even for the acute	TGRPDCL submits that the proposed staffing plan has been proposed as per G.O.Ms.No.44, dated 17.12.2025. The 1,000 O&M staff and artisans will be allocated based on actual field requirements, The staffing details mentioned are preliminary requirements.

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	shortage of staff in TGSPDCL and TGNPDCL many newly built substation are kept vacant and many substation being run with skeletal staff and existing O&M, staff and Artisans are forced to work 12 hour to 24 hours and are being manned by only 2 No. persons which is resulting into much work burden and reeling under stress, already many vacancies are existing in the Discoms if without creating a new vacancies in the new discoms, the bearing will be on better serving of the consumer supply of uninterrupted power supply round the clock will also adversely. Even in the TGRPDCL, it learnt that nearly more than five lakhs distribution transformers where bound to be looked after, nearly 1000 O&M staff and artisans has to look after, it is beyond the capacity to serve such a huge network. Approximately, 1 No. O&M staff has to serve two mandals, which will overburden the O&M staff and consumers of specific categories of TGRPDCL will severely affected. A special proposal offered by TGRPDCL for offering promotions to next higher career out of the turn is against to the existing service conditions and against to the fundamental rules and which also tantamount to right to equality and subject the seniors to untold hardship and loss when juniors bypass Seniors for promotion in the new company. Many service related disputes will arise causing legal entanglements which will have adverse effect on the performances of the employees.	

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92.	13. Recovery of True-Up Costs In a category-based DISCOM serving subsidised consumers, recovery of true-up costs through tariff is not feasible. In the absence of cross-subsidy, such costs will devolve upon the State Government or accumulate as regulatory assets. APTEL has held that accumulation of regulatory assets without a credible recovery mechanism is impermissible and detrimental to sector sustainability.	As per the GO amendment G.O.Ms.No.8 dated 08.05.2026, the allocation of PPAs between the three Distribution companies of Telangana namely TGRPDCL, TGSPDCL and TGNPDCL shall be done in such a manner that a higher share of Renewable Energy is allotted to TGRPDCL and category wise uniform tariff is maintained across the State. This will ensure that subsidy requirement for TGRPDCL doesn't increase and cost recovery remains manageable without excessive accumulation of regulatory assets.
Response to Telangana Electricity Employees 1104 Union		
93.	1. Cross-Subsidy, Tariff Principles, and Financial Viability Under Sections 61 and 62 of the Electricity Act, 2003, tariff determination is required to progressively reflect the cost of supply, while also recognizing cross-subsidy within permissible limits. The proposed segregation of subsidized consumer categories into a separate DISCOM may remove cross-subsidy burden from high-paying consumers while, it does not reduce the actual cost of supply. In the absence of cross-subsidy, such costs can only be recovered either through substantial tariff revision for subsidized consumers or through explicit Government subsidy. A DISCOM catering exclusively to subsidized consumers will have no	TGRPDCL submits that the proposed restructuring is designed to ensure financial stability and sustainability of all 3 DISCOMs. As per the existing legal and regulatory framework, cross-subsidy is to be reduced progressively. The allocation of higher share of low-cost renewable energy to TGRPDCL helps moderate cost of supply, ensuring that uniform tariff across the state TGRPDCL's revenue gap will be addressed through timely subsidy support, ensuring continuity of operations and discharge of statutory obligations.

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	internal revenue buffer and will be entirely dependent on timely and assured subsidy releases. Any delay or shortfall in subsidy payments will directly affect power purchase obligations, system maintenance, payment of employee salaries and statutory dues. APTEL has consistently held that financial viability of a distribution licensee is a prerequisite for effective discharge of statutory obligations.	
94.	2. Mandatory Advance Subsidy under Section 65 Section 65 of the Electricity Act, 2003 mandates that any subsidy directed by the State Government shall be paid in advance to the distribution licensee to compensate for the tariff determined by the Commission. Past experience demonstrates that advance and full subsidy payments have not been consistently ensured. In the absence of time-bound, and advance subsidy mechanism, the proposed Third DISCOM with subsidised categories will remain financially vulnerable, contrary to the provisions of the Act and settled APTEL rulings emphasizing certainty of revenue streams.	TGRPDCL submits that while it serves subsidised consumer categories, the GoTG has committed to ensuring timely subsidy releases to maintain financial viability. Section 65 of the Electricity Act, 2003 mandates that subsidy must be paid in advance,.
95.	3. Universal Service Obligation under Section 43 While Section 14 of the Act permits multiple distribution licensees in the same area, Section 43 imposes a mandatory and non-negotiable Universal Supply Obligation on every distribution licensee.	Universal supply obligation has been mandated in Electricity Act 2003, in order to ensure no consumer is denied power supply by a Distribution licensee, citing remote conditions or infeasibility in supply of power or commercial un-attractiveness in extending power supply. USO specifically safeguards the interest of

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	The Electricity Act envisages area-based licensing. Consumer-category-based segregation raises serious legal concerns regarding discharge of the universal service obligation, particularly in respect of agriculture and water supply consumers. APTEL has consistently held that restructuring cannot dilute, fragment, or shift statutory obligations. The proposed model lacks clarity on how the Third DISCOM will independently and effectively discharge its universal supply obligation.	consumers in the above scenario and discourages licensees in cherry picking commercially attractive consumer categories such as – Industrial and Commercial categories. TGRPDCL will operate in accordance with licensee conditions notified by the Hon'ble Commission.
96.	4. Privatization of Incumbent Discoms As reflected in Table-6 of G.O.Ms.No. 44, high-paying consumer categories such as commercial and industrial consumers are proposed to remain with the incumbent DISCOMs, while subsidised consumer categories are to be segregated into a separate entity. Further, the energy requirement of TGNPDCL constitutes only about 13% of the total State energy requirement. This restructuring will substantially alter the consumer mix of the incumbent DISCOMs, rendering them predominantly high-revenue and commercially attractive utilities. Such a configuration is likely to enhance the attractiveness of the incumbent DISCOMs to private sector particularly in the absence of cross-subsidy and social service obligations. In this context, employees have expressed serious apprehension that the	TGRPDCL submits that the issue raised by the objector needs to be viewed from wider ambit of reforms aimed at improving the service quality and financial sustainability of DISCOMs. It may be noted that the formation of a new licensee to exclusively serve agricultural and allied consumers is a transformative step in the protracted reforms journey which the power sector has been witnessing since 2003. The guiding principle of this reformative measure is to ensure quality and reliable power supply to the consumer categories and to progressively improve the financial position of DISCOMs and does not indicate any move towards privatization.

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	proposed formation of a Third DISCOM catering exclusively to subsidised consumers may operate as a precursor to future privatisation or dilution of public ownership of the incumbent DISCOMs. In the absence of explicit, binding policy assurances and statutory safeguards such apprehensions cannot be treated as unfounded and are likely to adversely affect employee confidence, industrial harmony, and long-term sector stability.	
97.	5. Allocation of the Arrears from the Govt & Dues payable to Generators to Third DISCOM It is observed from the table 9 of the G.O. Ms 44 dated 17.12.2025 that major liabilities, including Arrears from Government & Dues payable to GENCOs, are proposed to be transferred entirely to the proposed Third DISCOM. Such an arrangement would impose a disproportionate financial burden on the Third DISCOM from its inception and render it a loss-bearing entity. In the absence of adequate independent revenue sources, the Third DISCOM will be dependent solely on Government payments to meet its obligations. Any delay in receipt of Government dues would severely affect its capacity to discharge payments to GENCOs, thereby adversely impacting their financial stability as well. This mechanism may lead to a cascading financial stress on both the Third DISCOM and the GENCOs.	The key sources of revenue for TGRPDCL would be timely subsidy support, revenue collections from LIS, CPWS, HMWSSB categories.

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98.	6. Supplier of Last Resort and Continuity of Supply The proposal does not clarify the mechanism for ensuring continuity of supply to essential services in the event of operational failure, financial distress, or inability of the Third DISCOM to supply power. Absence of a clearly defined Supplier of Last Resort mechanism poses a serious statutory and public interest risk. APTEL has repeatedly emphasised that continuity of supply, particularly for essential services, cannot be left uncertain in restructuring exercises.	TGRPDCL submits that it will ensure continuous and reliable power supply to all consumers under its jurisdiction, including essential services, in line with statutory obligations. The proposed framework will include clear operational protocols and contingency arrangements to address any situation of operational failure or financial distress, ensuring that supply is not interrupted.
99.	7. Distribution Network Ownership and Operational Accountability In a scenario where multiple DISCOMs operate in the same geographical area, statutory and regulatory clarity is required regarding: • Ownership of distribution assets such as DTRs, LT lines, and interface meters, • Operation and maintenance responsibility, • fault rectification authority, and • Dispute resolution mechanisms. The proposal envisages deputation/transfer of only about 1,000 Operation & Maintenance (O&M) personnel, resulting in an unworkable workload of approximately 522 Distribution Transformers (DTRs) and about 261 circuit kilometres of Agricultural LT lines for each O&M employee. Given that Agriculture networks are predominantly rural and remote with higher fault	TGRPDCL submits that all inter-DISCOM arrangements will be clearly defined through formal Service Level Agreements (SLAs) with TGSPDCL and TGNPDCL. These agreements will specify roles, fault response timelines, maintenance responsibility, grievance handling, and accountability mechanisms. TGRPDCL will remain the single point of responsibility for consumers under its jurisdiction, with clear operational coordination in place. The SLAs will be placed before the Commission, ensuring full clarity, enforceability, and accountability. The restructuring involves planned and balanced deployment of manpower, ensuring that both TGRPDCL and existing DISCOMs have adequate staff to perform their respective functions effectively.

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	incidence, such deployment is operationally not workable. APTEL has held that restructuring must be operationally viable and not merely administratively expedient.	
100.	8. Energy Accounting, Metering, and Settlement The proposal lacks clarity regarding feeder-wise, DTR-wise, and consumer-wise energy accounting, as well as inter-DISCOM settlement mechanisms subject to Commission approval. Earlier attempts of metering Agriculture Transformers have failed due to technical, operational, and communication constraints. The presently adopted ISI methodology is itself subject to inaccuracies. APTEL has consistently emphasised that regulatory approvals, tariff determination, and true-up exercises must be based on verifiable and reliable energy data. Absence of such data renders the proposed structure legally and regulatory vulnerable.	TGRPDCL submits that implementation of Transformer monitoring for energy accounting will be carried out in a phased and systematic manner. Upon grant of license, tenders will be initiated for installation along with necessary communication infrastructure, and maintenance provisions to ensure reliable data collection and processing. Until full deployment is achieved, existing energy accounting and settlement mechanisms will continue in coordination with incumbent DISCOMs.
101.	9. Power Purchase Cost Allocation During peak hours, when marginal power purchase costs are extremely high, accurate attribution of drawl to the Third DISCOM becomes critical. The proposed reliance on approximately 5 .3 lakh AGL interface meters for D-D settlement raises serious concerns regarding accuracy and auditability.	As per the latest GO, G.O.Ms.No.8 dated 08.05.2026, the allocation of PPAs between the three Distribution companies of Telangana namely TGRPDCL, TGSPDCL and TGNPDCL shall be done in such a manner that a higher share of Renewable Energy is allotted to TGRPDCL since the demand profile of consumers transferred to TGRPDCL also aligns with the generation pattern of Renewable Energy sources there by reducing dependency on

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	Any ambiguity in power purchase cost allocation is likely to result in disputes during ARR and true-up proceedings.	market purchases during peak hours. It may also be noted that hydro plants are also allocated to TGRPDCL. This will enable in meeting the LIS requirements. Any remaining requirement will be met through, through D-to-D purchases banking arrangements.
102.	10. Loss Norms and Risk Allocation Energy input to the Third DISCOM is accounted at the LT voltage level using normative loss parameters, while the 11 kV distribution network is owned, operated, and maintained by the incumbent DISCOM. In such a scenario, where actual losses at the 11 kV level exceed the loss levels approved by the Hon'ble TGERC, in such scenario: • Which distribution licensee shall bear such excess losses, and • Whether such losses shall be treated as a pass-through in tariff or be disallowed. In the absence of such clarity, loss accountability becomes diffused between entities, rendering tariff determination and true-up proceedings legally unsustainable. The Hon'ble Appellate Tribunal for Electricity has consistently held that loss accountability must be clearly and definitively assigned and cannot be shared or ambiguously attributed among multiple licensees.	TGRPDCL submits that the proposed framework provides for clear demarcation of loss accountability between the DISCOMs. Voltage-wise losses approved by Hon'ble TGERC would be considered and deviations would be accounted for as per the regulatory provisions
103.	11. Operational Control and Emergency Response Operational responsibility during outages, voltage issues, system	TGRPDCL submits that the three-DISCOM structure has been established within the framework of the Electricity Act, 2003.

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	contingencies, and emergency restoration must be clearly demarcated. Absence of such clarity due to third DISCOM will result in field-level confusion and compromise system reliability, particularly for essential services.	During the transition period, operational coordination and Emergency outage response among the three DISCOMs will be ensured through Inter DISCOM coordination, coordination with TGSLDC, and the metering and interface arrangements notified in G.O.Ms.No.44 dated 17.12.2025. Detailed guidelines for O&M coordination, delineating responsibilities between DISCOMs for network maintenance will be included in the business plan submission.
104.	12. Employee Service Conditions APTEL has consistently recognised that restructuring should not adversely affect service conditions, career progression, or legitimate expectations of employees. The proposal simultaneously offers promotions as an incentive for transfer while abolishing posts vacated in the incumbent DISCOMs. These provisions are mutually contradictory and undermine employee confidence, making the proposal vulnerable to service-related disputes. The proposal of transferring Engineers and Staff on permanent basis from TRANSCO, GENCO & DISCOMs will create confusion. Particularly fixing of inter-se-seniority among them will be very difficult task and finally ends up in litigation & legal tussles. Further to the above, the employees working in TGTRANSCO and TG	TGRPDCL submits that the proposed staffing plan has been proposed as per G.O.Ms.No.44, dated 17.12.2025. The 1,000 O&M staff and artisans will be allocated based on actual field requirements, The staffing details mentioned are preliminary requirements.

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	GENCO, who will be permanently absorbed into new TGRPDCL doesn't have experience or expertise in distribution front, even for the acute shortage of staff in TGSPDCL and TGNPDCL many newly built substation are kept vacant and many substation being run with skeletal staff and existing O&M, staff and Artisans are forced to work 12 hour to 24 hours and are being manned by only 2 No. persons which is resulting into much work burden and reeling under stress, already many vacancies are existing in the Discoms if without creating a new vacancies in the new discoms, the bearing will be on better serving of the consumer supply of uninterrupted power supply round the clock will also adversely. Even in the TGRPDCL, it learnt that nearly more than five lakhs distribution transformers where bound to be looked after, nearly 1000 O&M staff and artisans has to look after, it is beyond the capacity to serve such a huge network. Approximately, 1 No. O&M staff has to serve two mandals, which will overburden the O&M staff and consumers of specific categories of TGRPDCL will severely affected. A special proposal offered by TGRPDCL for offering promotions to next higher career out of the turn is against to the existing service conditions and against to the fundamental rules and which also tantamount to right to equality and subject the seniors to untold hardship and loss when juniors bypass Seniors for promotion in the new company. Many service related disputes will arise causing legal entanglements which will have adverse affect on the performances of the employees.	

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105.	13. Recovery of True-Up Costs In a category-based DISCOM serving subsidized consumers, recovery of true-up costs through tariff is not feasible. In the absence of cross-subsidy, such costs will devolve upon the State Government or accumulate as regulatory assets. APTEL has held that accumulation of regulatory assets without a credible recovery mechanism is impermissible and detrimental to sector sustainability.	As per the GO amendment G.O.Ms.No.8 dated 08.05.2026, the allocation of PPAs between the three Distribution companies of Telangana namely TGRPDCL, TGSPDCL and TGNPDCL shall be done in such a manner that a higher share of Renewable Energy is allotted to TGRPDCL and category wise uniform tariff is maintained across the State. This will ensure that subsidy requirement for TGRPDCL doesn't increase and cost recovery remains manageable without excessive accumulation of regulatory assets.
Response to Telangana Sate Electricity Assistant Engineers Association		
106.	1. Cross-Subsidy, Tariff Principles, and Financial Viability Under Sections 61 and 62 of the Electricity Act, 2003, tariff determination is required to progressively reflect the cost of supply, while also recognizing cross-subsidy within permissible limits. The proposed segregation of subsidized consumer categories into a separate DISCOM may remove cross-subsidy burden from high-paying consumers while, it does not reduce the actual cost of supply. In the absence of cross-subsidy, such costs can only be recovered either through substantial tariff revision for subsidized consumers or through explicit Government subsidy. A DISCOM catering exclusively to subsidized consumers will have no	TGRPDCL submits that the proposed restructuring is designed to ensure financial stability and sustainability of all 3 DISCOMs. As per the existing legal and regulatory framework, cross-subsidy is to be reduced progressively. The allocation of higher share of low-cost renewable energy to TGRPDCL helps moderate cost of supply, ensuring that uniform tariff across the state TGRPDCL's revenue gap will be addressed through timely subsidy support, ensuring continuity of operations and discharge of statutory obligations.

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	internal revenue buffer and will be entirely dependent on timely and assured subsidy releases. Any delay or shortfall in subsidy payments will directly affect power purchase obligations, system maintenance, payment of employee salaries and statutory dues. APTEL has consistently held that financial viability of a distribution licensee is a prerequisite for effective discharge of statutory obligations.	
107.	2. Mandatory Advance Subsidy under Section 65 Section 65 of the Electricity Act, 2003 mandates that any subsidy directed by the State Government shall be paid in advance to the distribution licensee to compensate for the tariff determined by the Commission. Past experience demonstrates that advance and full subsidy payments have not been consistently ensured. In the absence of time-bound, and advance subsidy mechanism, the proposed Third DISCOM with subsidised categories will remain financially vulnerable, contrary to the provisions of the Act and settled APTEL rulings emphasising certainty of revenue streams.	TGRPDCL submits that while it serves subsidised consumer categories, the GoTG has committed to ensuring timely subsidy releases to maintain financial viability. Section 65 of the Electricity Act, 2003 mandates that subsidy must be paid in advance,.
108.	3. Universal Service Obligation under Section 43 While Section 14 of the Act permits multiple distribution licensees in the same area, Section 43 imposes a mandatory and non-negotiable Universal Supply Obligation on every distribution licensee.	Universal supply obligation has been mandated in Electricity Act 2003, in order to ensure no consumer is denied power supply by a Distribution licensee, citing remote conditions or infeasibility in supply of power or commercial un-attractiveness in extending power supply. USO specifically safeguards the interest of

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109.	4. Privatization of Incumbent Discoms As reflected in Table-6 of G.O.Ms.No. 44, high-paying consumer categories such as commercial and industrial consumers are proposed to remain with the incumbent DISCOMs, while subsidised consumer categories are to be segregated into a separate entity. Further, the energy requirement of TGNPDCL constitutes only about 13% of the total State energy requirement. This restructuring will substantially alter the consumer mix of the incumbent DISCOMs, rendering them predominantly high-revenue and commercially attractive utilities. Such a configuration is likely to enhance the attractiveness of the incumbent DISCOMs to private sector particularly in the absence of cross-subsidy and social service obligations. In this context, employees have expressed serious apprehension that the	TGRPDCL submits that the issue raised by the objector needs to be viewed from wider ambit of reforms aimed at improving the service quality and financial sustainability of DISCOMs. It may be noted that the formation of a new licensee to exclusively serve agricultural and allied consumers is a transformative step in the protracted reforms journey which the power sector has been witnessing since 2003. The guiding principle of this reformative measure is to ensure quality and reliable power supply to the consumer categories and to progressively improve the financial position of DISCOMs and does not indicate any move towards privatization.

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111.	6. Supplier of Last Resort and Continuity of Supply The proposal does not clarify the mechanism for ensuring continuity of supply to essential services in the event of operational failure, financial distress, or inability of the Third DISCOM to supply power. Absence of a clearly defined Supplier of Last Resort mechanism poses a serious statutory and public interest risk. APTEL has repeatedly emphasised that continuity of supply, particularly for essential services, cannot be left uncertain in restructuring exercises.	TGRPDCL submits that it will ensure continuous and reliable power supply to all consumers under its jurisdiction, including essential services, in line with statutory obligations. The proposed framework will include clear operational protocols and contingency arrangements to address any situation of operational failure or financial distress, ensuring that supply is not interrupted.
112.	7. Distribution Network Ownership and Operational Accountability In a scenario where multiple DISCOMs operate in the same geographical area, statutory and regulatory clarity is required regarding: • Ownership of distribution assets such as DTRs, LT lines, and interface meters, • Operation and maintenance responsibility, • fault rectification authority, and • Dispute resolution mechanisms. The proposal envisages deputation/transfer of only about 1,000 Operation & Maintenance (O&M) personnel, resulting in an unworkable workload of approximately 522 Distribution Transformers (DTRs) and about 261 circuit kilometres of Agricultural LT lines for each O&M employee. Given that Agriculture networks are predominantly rural and remote with higher fault	TGRPDCL submits that all inter-DISCOM arrangements will be clearly defined through formal Service Level Agreements (SLAs) with TGSPDCL and TGNPDCL. These agreements will specify roles, fault response timelines, maintenance responsibility, grievance handling, and accountability mechanisms. TGRPDCL will remain the single point of responsibility for consumers under its jurisdiction, with clear operational coordination in place. The SLAs will be placed before the Commission, ensuring full clarity, enforceability, and accountability. The restructuring involves planned and balanced deployment of manpower, ensuring that both TGRPDCL and existing DISCOMs have adequate staff to perform their respective functions effectively.

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	incidence, such deployment is operationally not workable. APTEL has held that restructuring must be operationally viable and not merely administratively expedient.	
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114.	9. Power Purchase Cost Allocation During peak hours, when marginal power purchase costs are extremely high, accurate attribution of drawl to the Third DISCOM becomes critical. The proposed reliance on approximately 5 .3 lakh AGL interface meters for D-D settlement raises serious concerns regarding accuracy and auditability.	As per the latest GO, G.O.Ms.No.8 dated 08.05.2026, the allocation of PPAs between the three Distribution companies of Telangana namely TGRPDCL, TGSPDCL and TGNPDCL shall be done in such a manner that a higher share of Renewable Energy is allotted to TGRPDCL since the demand profile of consumers transferred to TGRPDCL also aligns with the generation pattern of Renewable Energy sources there by reducing dependency on

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	Any ambiguity in power purchase cost allocation is likely to result in disputes during ARR and true-up proceedings.	market purchases during peak hours. It may also be noted that hydro plants are also allocated to TGRPDCL. This will enable in meeting the LIS requirements. Any remaining requirement will be met through, through D-to-D purchases banking arrangements.
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	contingencies, and emergency restoration must be clearly demarcated. Absence of such clarity due to third DISCOM will result in field-level confusion and compromise system reliability, particularly for essential services.	During the transition period, operational coordination and Emergency outage response among the three DISCOMs will be ensured through Inter DISCOM coordination, coordination with TGSLDC, and the metering and interface arrangements notified in G.O.Ms.No.44 dated 17.12.2025. Detailed guidelines for O&M coordination, delineating responsibilities between DISCOMs for network maintenance will be included in the business plan submission.
117	12. Employee Service Conditions APTEL has consistently recognised that restructuring should not adversely affect service conditions, career progression, or legitimate expectations of employees. The proposal simultaneously offers promotions as an incentive for transfer while abolishing posts vacated in the incumbent DISCOMs. These provisions are mutually contradictory and undermine employee confidence, making the proposal vulnerable to service-related disputes. The proposal of transferring Engineers and Staff on permanent basis from TRANSCO, GENCO & DISCOMs will create confusion. Particularly fixing of inter-se-seniority among them will be very difficult task and finally ends up in litigation & legal tussles. Further to the above, the employees working in TGTRANSCO and TG	TGRPDCL submits that the proposed staffing plan has been proposed as per G.O.Ms.No.44, dated 17.12.2025. The 1,000 O&M staff and artisans will be allocated based on actual field requirements, The staffing details mentioned are preliminary requirements.

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	GENCO, who will be permanently absorbed into new TGRPDCL doesn't have experience or expertise in distribution front, even for the acute shortage of staff in TGSPDCL and TGNPDCL many newly built substation are kept vacant and many substation being run with skeletal staff and existing O&M, staff and Artisans are forced to work 12 hour to 24 hours and are being manned by only 2 No. persons which is resulting into much work burden and reeling under stress, already many vacancies are existing in the Discoms if without creating a new vacancies in the new discoms, the bearing will be on better serving of the consumer supply of uninterrupted power supply round the clock will also adversely. Even in the TGRPDCL, it learnt that nearly more than five lakhs distribution transformers where bound to be looked after, nearly 1000 O&M staff and artisans has to look after, it is beyond the capacity to serve such a huge network. Approximately, 1 No. O&M staff has to serve two mandals, which will overburden the O&M staff and consumers of specific categories of TGRPDCL will severely affected. A special proposal offered by TGRPDCL for offering promotions to next higher career out of the turn is against to the existing service conditions and against to the fundamental rules and which also tantamount to right to equality and subject the seniors to untold hardship and loss when juniors bypass Seniors for promotion in the new company. Many service related disputes will arise causing legal entanglements which will have adverse affect on the performances of the employees.	

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118.	13. Recovery of True-Up Costs In a category-based DISCOM serving subsidised consumers, recovery of true-up costs through tariff is not feasible. In the absence of cross-subsidy, such costs will devolve upon the State Government or accumulate as regulatory assets. APTEL has held that accumulation of regulatory assets without a credible recovery mechanism is impermissible and detrimental to sector sustainability.	As per the GO amendment G.O.Ms.No.8 dated 08.05.2026, the allocation of PPAs between the three Distribution companies of Telangana namely TGRPDCL, TGSPDCL and TGNPDCL shall be done in such a manner that a higher share of Renewable Energy is allotted to TGRPDCL and category wise uniform tariff is maintained across the State. This will ensure that subsidy requirement for TGRPDCL doesn't increase and cost recovery remains manageable without excessive accumulation of regulatory assets.
Response to additional comments by Prayas (Energy Group)		
119.	A category -based DISCOM has many regulatory and operational challenges and we feel that this idea needs more consideration before finalization. Some objections have been filed detailing the challenges, but the DISCOMs have only submitted short notes expressing No Objections. It is unfortunate that they have not analysed the implications of the formation of such a company. If TGRPDCL is to depend on DT metering for agriculture energy accounting, many challenges are expected. As suggested in the Annexure -1, it is better to take up a pilot project before taking it up state-wide. Until DT metering stabilises, it is better to adopt feeder metering based	TGRPDCL submits as follows: The proposed structure has been evolved after due consideration of the objectives set out in G.O. Ms. No. 44 dated 17.12.2025, namely to provide focused service to agricultural and allied consumers, improve operational efficiency, and enhance the financial viability of the DISCOMs. The learnings from installation of Transformer monitoring Units on DTRs roll-out across different states in the country will be studied and suitable model for implementation would be adopted by TGRPDCL. Accordingly, the modalities will be finalized for roll-out. Such a process will enable in reducing operational risks pointed

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	approach to estimate agriculture consumption. This is also elaborated in Annexure 1.	out by the objector and in achieving efficiencies. Also, the feeder segregation of agricultural consumers is CAPEX intensive exercise and comes with the associated higher project execution timelines.
120.	Alternate institutional structure If the decision is to go ahead with the formation of a separate entity for power supply to government supported consumers, we request Hon'ble TGERC to advise GoTG to reconsider the institutional structure of Rythu DISCOM, since a new DISCOM license has many regulatory and operational challenges, such as the definition of distribution, honouring USO (handling non-agriculture consumer applications to TGRPDCL or agriculture consumer applications to DISCOMs) and ensuring quality of supply & service to its consumers. These were elaborated in our earlier submission dated May 01, 2026. It may be better that TGRPDCL has only the responsibility of power supply to specific government supported consumers (Agriculture, Lift Irrigation and Water supply schemes), with no role in construction & operation of network, and no role in metering & billing. Alternately, a new company – say TG Rythu Power Supply Company - TGRyPSCO could be formed.	It is submitted that limiting the entity to power supply without corresponding network and operational responsibilities would dilute accountability. The proposed arrangement ensures an integrated approach with clear demarcation of functions, consumer categories, and obligations, thereby addressing operational and regulatory requirements effectively. The grant of a Distribution Licence to TGRPDCL enables clear assignment of responsibility for supply, network management, metering, billing, and consumer service, ensuring accountability under the statutory and regulatory framework.

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121	Suggested Framework for the Agriculture company The framework for an Agriculture company – be it TGRPDCL or newly formed TGRyPSCO - could be as given below. a. TGRPDCL/TGRyPSCO (now onwards called Agriculture company) can apply to TGERC for an intra-state trading license, which could be granted after due process, under the APERC Intra-state Trading Regulations 2005. This appears a good option, since there is no provision of a Supply Company in the EAct, and formation of a new distribution licensee has many regulatory and operational challenges. b. GoTG can direct DISCOMs to trade low cost power to the Agriculture company - through allocation of low cost PPAs and arriving at a low BST after accounting for existing cross-subsidy support in other DISCOMs. This would be similar to the arrangement of a low BST to RESCO, or as practised with Odisha DISCOMs. c. GoTG can direct DISCOMs to waive the trading margin and re-imburse them the required wheeling charges & losses. d. DISCOMs can continue to construct and operate their respective distribution networks and be responsible for metering & billing of the all consumers, including those of the Agriculture company. e. DISCOMs and the Agriculture company will jointly work on energy	Third DISCOM in Telangana was incorporated with a broader objective of improving the Electricity supply quality for farmers with a targeted approach for such consumer categories. This will be implemented through a dedicated Operations & Maintenance manpower, separate grievance redressal mechanisms, focused improvement efforts for safety and reliability of electricity to Agricultural and allied consumers As per the latest PPA amendment, allocation of PPAs needs to be done in such a manner to ensure uniform tariff across the state.

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	accounting of Agriculture company's power supply to agriculture and other consumers. f. Agriculture company will work with support from DISCOMs to handle supply & service complaints and complaint redressal of its consumers. Thus, these consumers will get much better and focussed attention. g. GoTG to ensure that only the liabilities of Agriculture company consumers are allocated to it. TGGENCO dues (Rs.26,950 Cr) and part of DISCOM working capital loans (Rs.9,032 Cr) should be absorbed by GoTG. GoTG should also try to absorb part or whole of the receivables from Lift Irrigation and Water supply consumers. The Maharashtra State Government order (dated 21/04/2026) on Agriculture demerger and the formation of MSEB Solar Agro Power Limited (MSAPL) under Section 131 of the EAct has provisions for this. It has provisions of the state government writing off non-recoverable receivables from agriculture consumers, taking over government guaranteed loans and issuing long-term government securities/paper to lenders in exchange for their loans. h. Agriculture company will need just the required staff at the HQ and a few at local DISCOM (say SE) offices. For all field work, it could draw upon the respective DISCOM staff. i. Going ahead, the Agriculture company could plan measures to reduce cost of supply. This could be through measures such as solar feeders for agriculture, Virtual Net-metering for LI and Water works, Short/Medium	

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	term contracts for LI etc. Agriculture supply is 24x7, but will be good to explore possibility of aligning it with solar hours, or at least meet part of the supply through solar. LI has very high connected load (projected as nearly 10,000 MW), but operates only for a few hours in a year. j. Going ahead, the Agriculture company can improve agriculture consumption estimates, and take steps to reduce power consumption through efficiency measures in electricity and water use. Annexure -1 is a short note on better estimation of agriculture consumption.	
122	Annexure 1: Better estimation of Agriculture Consumption TG DISCOMs had used the ISI methodology, based on sample DT meter readings to estimate agriculture consumption. But a few years ago, Hon'ble TGERC suggested an alternate approach based on connected load and hours of operation. This method is now being flowed. Since agriculture metering is not feasible, agriculture consumption can be better estimated using feeder metering or DT metering. Many states, including AP, use feeder meter data to estimate agriculture consumption. Agriculture DT metering In TG, when we had suggested that all Agriculture DTs should be metered and agriculture consumption should be estimated based on such meter readings, DISCOMs had responded that this could be done under RDSS. But no clear timelines or plans were provided for this. Proposed	TGRPDCL submits as follows: The proposal of estimating agricultural consumption through Transformer monitoring units has been considered in view of the need for improved accuracy and better energy accounting. The learnings from installation of Transformer monitoring Units on DTRs roll-out across different states in the country will be studied and suitable model for implementation would be adopted by TGRPDCL. Accordingly, the modalities will be finalized for roll-out. Such a process will enable to reduce operational risks. The implementation shall be aligned with ongoing schemes such as RDSS.

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	TGRPDCL plans to install smart meters on all the agriculture DTs and measure agriculture consumption based on those readings. The progress of smart metering in India has been facing many challenges. Feeder metering coverage is nearly 100%, whereas the same cannot be said about DT or consumer metering. As per the CEA Report on metering in the country (as on 31/3/2025), the status of DT metering is as given in Table 1. <table border="1"> <tr> <td></td><td>India</td><td>TG</td></tr> <tr> <td>No of rural DTs Lakhs</td><td>130.85</td><td>6.24</td></tr> <tr> <td>% Metered</td><td>39%</td><td>26%</td></tr> </table> Table 1: Rural DTs and metering status (CEA report on metering 2025) It can be seen that only 39% of the rural DTs are metered in India and only 26% in TG. As per the CEA report, near 100% rural DT metering is reported from only six states – namely Chhattisgarh, Gujarat, Kerala, Himachal, Goa and Mizoram. Smart meters are being installed on DTs, are part of RDSS, and they are expected to communicate data in an online mode. As per the RDSS dashboard, only on-third of the installed meters are communicating. This may be an optimistic figure, since as per a CII report on smart metering, only 3% of the DTs are communicating. Issues with meter failures and communication failure have been reported from many states. All these show the challenges in installing smart meters on		India	TG	No of rural DTs Lakhs	130.85	6.24	% Metered	39%	26%	
	India	TG									
No of rural DTs Lakhs	130.85	6.24									
% Metered	39%	26%									

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	rural DTs and ensuring online data. Therefore, in TG, if Agriculture DT metering is to be taken up, it is better to take up a pilot in one circle, to understand installation and operation issues. Lessons from the pilot can be used to take up metering for the whole state.	
123.	Feeder metering based estimation of agriculture consumption As per the CEA metering status report, all the 10,620 rural 11 kV feeders in Telangana are reportedly metered. This data can be used to estimate agriculture consumption as described in the following paragraphs. a. For dedicated agriculture feeders If the feeder has only agriculture consumers, annual agriculture consumption on a feeder can be calculated as: Agriculture consumption (MU) = Annual energy export – Energy losses on feeder, DT and LT lines To begin with, energy losses can be calculated based on the % losses given in the approved MYT order for distribution business. b. For mixed feeders Agriculture consumption (MU) = Annual energy export – Energy losses on feeder, DT and LT lines – Metered sales to non-agriculture consumers	TGRPDCL submits as follows: For feeder level accounting to be implemented it is necessary that the proportion of dedicated agricultural feeders are higher in number. Considering the present situation. has proposed installation of transformer monitoring units on DTRs to enable more accurate measurement of energy at the DTR level.

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	It is expected that the consumers have been properly indexed to feeder and DT, and their metered consumption is available. To begin with, energy losses can be calculated based on the % losses given in the approved MYT order for distribution business. Steps for improving this method Feeder based estimation needs to be improved to ensure that metered consumption and losses are realistic. Feeder meter data may not be available for all feeders for the whole year. To account for all these, feeders could be grouped into a few categories (based on considerations such as length, conductor type, loading etc), and detailed studies could be taken on a selected sample from each category. This is to ensure any gaps in consumer indexing or consumer metering quality, as well as to get a realistic estimation of losses. Technical loss can be calculated based on hourly feeder loading, conductor characteristics, DT and pumpset configuration. More details on sampling feeders and method for technical loss estimation can be found in the Final report of the Maharashtra Agriculture consumption study working group, 2020. We suggest that this approach be customized for TG and adopted for agriculture consumption estimation.	

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Telangana State United Electricity Employees Union వారికి సమాధానం:		
124.	తెలంగాణ రాష్ట్ర విద్యుత్ ఉద్యోగుల యునైటెడ్ ఎంప్లాయిస్ యూనియన్ వారు జారీచేసిన నోటిఫికేషన్ ప్రకారం TGRPDCL సంస్థకు విద్యుత్ పంపిణీ లైసెన్స్ ఇవ్వడాన్ని తీవ్రంగా వ్యతిరేకిస్తూ తమ అభ్యంతరాలను తెలియజేస్తున్నారు. ప్రభుత్వ బకాయిలు మరియు జనరేటింగ్ సంస్థలకు చెల్లింపుల బదిలీ: జి.ఓ.ఎం.ఎస్. నెం. 44 లోని టేబుల్-9 ప్రకారం ప్రభుత్వ బకాయిలు మరియు విద్యుత్ ఉత్పత్తి సంస్థలకు చెల్లించాల్సిన బకాయిలను మొత్తం మూడవ విద్యుత్ పంపిణీ సంస్థకు బదిలీ చేయాలని ప్రతిపాదించారు. దీనితో కొత్త విద్యుత్ పంపిణీ సంస్థ ప్రారంభం నుంచే నష్టాల్లో నడిచే సంస్థగా మారుతుంది. ప్రభుత్వ చెల్లింపులు ఆలస్యమైతే విద్యుత్ ఉత్పత్తి సంస్థలకు చెల్లింపులు చేయలేని పరిస్థితి ఏర్పడి, వాటి ఆర్థిక స్థితి కూడా దెబ్బతింటుంది.	బదిలీ తేదీ నాటికి ఉన్న స్థితి ఆధారంగా వాస్తవంగా TGRPDCL కు బదిలీ చేయబడే బకాయిలు నిర్ణయించబడును. ఆ తేదీ అనంతరం గౌరవ కమిషన్ ఆమోదించే సబ్సిడీ బకాయిలు లేదా ట్రూ-అప్ మొత్తాలు కూడా తుది సర్దుబాటులో భాగంగా చేర్చబడును. బదిలీ ప్రక్రియ ఖచ్చితత్వం మరియు పారదర్శకతతో కొనసాగుటకు అవసరమైన పూర్తి మరియు నవీకరించిన బకాయిల వివరాలు బదిలీ సమయంలో అందించబడును. ప్రభుత్వం నుండి సబ్సిడీ మొత్తాలు సమయానుకూలంగా అందించబడును. అదేవిధంగా, TGRPDCL సంస్థ వ్యవసాయ విద్యుత్ సరఫరాతో పాటు లిఫ్ట్ ఇరిగేషన్, HMWSSB, CPWS తదితర ఇతర వినియోగ వర్గాలకు కూడా విద్యుత్ సరఫరా అందించుచున్నది. వీటి ద్వారా సంస్థకు ఆదాయం సమకూరును.

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	రైతు (వ్యవసాయ) విద్యుత్ పంపిణీ సంస్థ ఆర్థిక లేదా కార్యనిర్వహణ వైఫల్యానికి గురైనప్పుడు విద్యుత్ సరఫరా ఎలా కొనసాగిస్తారనే అంశంపై స్పష్టత లేదు. చివరి ప్రత్యామ్నాయ సరఫరాదారు వ్యవస్థ లేకపోవడం ప్రజా ప్రయోజనాలకు మరియు చట్టపరమైన బాధ్యతలకు ప్రమాదకరం. జి.ఓ.ఎం.ఎస్. నెం. 44 ప్రకారం వాణిజ్య మరియు పారిశ్రామిక వినియోగదారులను ప్రస్తుతం ఉన్న విద్యుత్ పంపిణీ సంస్థలలోనే ఉంచి, సబ్సిడీ వినియోగదారులను వేరే విద్యుత్ పంపిణీ సంస్థకు మార్చాలని ప్రతిపాదించారు. దీనితో ప్రస్తుతం ఉన్న విద్యుత్ పంపిణీ సంస్థలు అధిక ఆదాయం వచ్చే సంస్థలుగా మారి, ప్రైవేట్ రంగానికి ఆకర్షణీయంగా మారే అవకాశం ఉంది. ఈ నేపథ్యంలో ఉద్యోగుల్లో ప్రైవేటీకరణపై తీవ్ర ఆందోళన నెలకొంది.	
125.	మొత్తం 5,22,479 విద్యుత్ ట్రాన్స్‌ఫార్మర్లు మరియు విద్యుత్ లైన్ల నిర్వహణ కేవలం 2000 మంది సిబ్బందితో ఎలా సాధ్యపడుతుంది.	ప్రస్తుతం జి.ఓ.ఎం.ఎస్. నెం.44 ప్రకారం 2000 మంది సిబ్బందికి ఆమోదం ఇవ్వబడింది. భవిష్యత్తులో అవసరాన్ని

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		బట్టి మరిన్ని ఉద్యోగులను నియమించబడతారు.
126.	తెలంగాణకి ఉచిత విద్యుత్ సరఫరా కోసం అయ్యే ఖర్చులో రాష్ట్ర ప్రభుత్వం కొంత భాగం భరిస్తోంది. మిగిలిన మొత్తాన్ని ప్రస్తుతం విద్యుత్ సంస్థలు అయిన TGSPDCL మరియు TGNPDCL సంస్థలు క్రాస్ సబ్సిడీ రూపంలో భరిస్తున్నాయి. కానీ ఇప్పుడు ప్రతిపాదించిన TGRPDCL సంస్థకు క్రాస్ సబ్సిడీ ఏ విధంగా సాధ్యపడుతుంది. ఈ భారాన్ని ఎవరు భరిస్తారు. ప్రస్తుత వినియోగదారుల బకాయిల్లో అత్యధిక భాగం TGRPDCL సంస్థకు బదిలీ అవుతున్నాయి. మరియు దీనికి సంబంధించి TGSPDCL మరియు TGNPDCL సంస్థలు చెల్లించాల్సిన 26950 కోట్ల రూపాయలు బదిలీ అవుతున్నాయి. TGSPDCL & TGNPDCL సంస్థలకు రాష్ట్ర ప్రభుత్వ శాఖలు చెల్లించాల్సిన మొత్తం 45398 కోట్లు. అందులో 35,982 కోట్ల రూపాయలు TG RPDCL సంస్థకు బదిలీ అవుతున్నాయి. కొత్తగా ఏర్పాటు చేసిన వ్యవస్థ కారణంగా ఉండే TG RPDCL సంస్థపై ఈ బదిలీ పెనుభారంగా మారే అవకాశం ఉంది. స్పష్టమైన చట్టబద్ధ హామీలు లేకుండా ఈ భయాలను నిరాధారమని	జి.ఓ. సవరణ G.O.Ms.No.8 తేదీ 08.05.2026 ప్రకారం TGRPDCL కు అధిక శాతం పునరుత్పాదక శక్తి (Renewable Energy) కేటాయించబడుతుంది. దీని వలన ఆ సంస్థ యొక్క మొత్తం విద్యుత్ సరఫరా వ్యయం తగ్గి, రాష్ట్రవ్యాప్తంగా వినియోగదారుల వర్గాల వారీగా సమాన విద్యుత్ చార్జీలు (Uniform Tariff) కొనసాగించుటకు సహాయపడును. డిస్కంల మధ్య ఆస్తులు మరియు బాధ్యతల బదిలీ, PPA (విద్యుత్ కొనుగోలు కేటాయింపు) కు అనుగుణంగా ఉండే విధంగా మరియు మూడు డిస్కంల ఆర్థిక స్థిరత్వాన్ని పొందే విధంగా నిర్వహించబడుతుంది.

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	చెప్పలేము. ఇది ఉద్యోగుల విశ్వాసం, పారిశ్రామిక శాంతి మరియు విద్యుత్ రంగ స్థిరత్వాన్ని దెబ్బతీస్తుంది.	
127	నష్టాల ప్రమాణాలు మరియు బాధ్యత: 11 కెవి నెట్‌వర్క్ ప్రస్తుతం ఉన్న విద్యుత్ పంపిణీ సంస్థలు నిర్వహిస్తున్న నేపథ్యంలో, మూడవ విద్యుత్ పంపిణీ సంస్థకు అలా కేటాయించే శక్తి లెక్కింపు జరుగుతుంది. ఈ పరిస్థితిలో: • అధిక నష్టాలను ఎవరు భరిస్తారు? • ఆ నష్టాలను విద్యుత్ ఛార్జీలలో అనుమతిస్తారా లేదా అనే అంశంపై స్పష్టత లేదు. విద్యుత్ అంతరాయం, వోల్టేజ్ సమస్యలు మరియు అత్యవసర పరిస్థితుల్లో బాధ్యతలు స్పష్టంగా నిర్ణయించకపోతే ఫీల్డ్ స్థాయిలో గందరగోళం ఏర్పడి వ్యవస్థ విశ్వసనీయత దెబ్బతింటుంది. రాష్ట్ర ప్రజల మరియు ఉద్యోగుల శ్రేయస్సును దృష్టిలో ఉంచుకుని ప్రభుత్వం ఎలాంటి నిర్ణయం తీసుకున్నా రాష్ట్ర ప్రయోజనాలకు / ఉద్యోగులకు విద్యుత్ సంస్థల మనుగడకు హాని కలగకుండా	లైసెన్స్ మంజూరు చేసిన వెంటనే బదిలీ చేయబడే డీటీఆర్‌లపై ట్రాన్స్‌ఫార్మర్ మానిటరింగ్ యూనిట్ల స్థాపనకు సంబంధించిన టెండర్ ప్రక్రియను TGRPDCL తక్షణమే ప్రారంభిస్తుందని సమర్పిస్తోంది. ఆ వ్యవస్థ పూర్తిగా అమలులోకి వచ్చే వరకు, ప్రస్తుతం అమలులో ఉన్న ఇంధన లెక్కల విధానం (Energy Accounting Methodology) మరియు సబ్సిడీ గణన విధానాన్నే సంబంధిత ప్రస్తుత డిస్కంల సమన్వయంతో TGRPDCL కొనసాగిస్తుంది. మీ వినతిని TGRPDCL గౌరవపూర్వకంగా స్వీకరిస్తుంది. సభ కార్యక్రమ నిర్వహణకు అనుగుణంగా మీ అభిప్రాయాన్ని తెలియజేసేందుకు తగిన సమయం కేటాయించబడును. ధన్యవాదములు.

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	చూడవలసిందిగా కోరుతున్నాము. 28-05-2026 న జరిగే బహిరంగ విచారణలో పాల్గొని మా అభిప్రాయాన్ని తెలియజేసేందుకు అవకాశం కల్పించగలరు.	
Response to The Federation of Telangana Chambers of Commerce and Industry (FTCCI)		
128.	A detailed business plan covering: • Sales forecast, load projections, and energy sources for the next five years. • Means of finance for meeting the assets and other resources required to achieve the above targets. • Projected Balance Sheets, Profit & Loss Accounts, and Cash Flow Statements for the next five years.	TGRPDCL submits that the detailed business plan covering sales forecast, load projections, PPAs, CAPEX requirements etc will be submitted to the Hon'ble Commission within three months of licence grant as required under "Clause 38.1 of Regulation 04 of 2016 (Distribution License Regulations). Extract from regulation "38.1 Subject to other regulations notified by the Commission, the Distribution Licensee shall submit a Business Plan within three (3) months of the Distribution Licence coming in force for such period as the Commission may direct and shall update such plan annually. The Business Plan shall, inter-alia, contain (i) year wise load growth, (ii) year wise Distribution loss reduction proposal along with specific action plan, (iii) metering plan for metering interface points, (iv) treatment of previous losses, (v) cost reduction plan, and (vii) other important financial analysis or parameters.

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		Post formation of TGRPDCL, the relevant financial statements will be placed in the public domain on its website, in line with the practice followed by existing DISCOMs.
129.	The manpower planning for the proposed DISCOM must consider the entire State, comprising 33 districts, 584 mandals, and 10,909 revenue villages, where the agricultural sector currently accounts for nearly 42% of the total energy consumption in the State. This issue assumes considerable significance, as there are approximately 30 lakh agricultural consumers, including both small and large farmers, with an annual energy requirement exceeding 35,000 MU, subject to variations in monsoon conditions. It is also pertinent to note that, unlike States such as Kerala, Gujarat, Chhattisgarh, Goa, and Mizoram, agricultural distribution lines in Telangana are not fully metered, with only about 26% presently metered. Further, the existence of mixed feeders in several areas makes implementation and DT metering a significant operational challenge.	TGRPDCL submits that the staffing outlined are preliminary requirements. TGRPDCL proposes to establish Consumer Grievance Redressal Forums (CGRFs), which will provide a dedicated and accessible mechanism for addressing consumer issues. As pointed out by the objector, proportion of dedicated agricultural feeders in Telangana are on the lower side, hence the proposal of metering of DTRs has been proposed. TGRPDCL submits that the learnings from DT metering roll-out across different states in the country will be studied and suitable model for implementation would be adopted by TGRPDCL. Accordingly, the modalities will be finalized for roll-out. Such a process will enable in reducing operational risks pointed out by the objector and in achieving efficiencies.
130.	Compliance with the Act (U/S 2(19) and TSERC regulation (Section 2.3) to issue a “DISTRIBUTION LICENSE	TGRPDCL would like to submit as follows – TGRPDCL is intended to serve agricultural and other allied

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	Section 2(19) of the Act defines a “distribution system” as a system of wires and associated facilities between the delivery points on the transmission lines or the generating station connection and the point of connection to the consumer’s installation. In the present case, TGRPDCL is proposed to utilize 11 kV feeders belonging to the existing DISCOMs on the DT side, with agricultural consumers at the receiving end. Under the Act, the licensee is responsible for maintaining and operating the distribution system within its area of supply. However, the ownership of the proposed distribution system of TGRPDCL remains unclear. As presently understood, there is no clear delineation of asset ownership in operational terms, particularly where assets are to be jointly involved in supply and maintenance activities. The TGERC Distribution license U/S 2.3 states a distribution system “means any system consisting of mainly cables, service lines and overhead lines, electric plant, meters having design voltage of 33kv and under and shall include any other system of higher voltage as the commission may specifically recognize. A distribution system shall not include any part of the Transmission System. THE TGERC regulation 2016 u/s 2.1(11) defines distribution as “conveyance of wheeling of electricity by means of a distribution system.	categories as outlined in the GOMs No 44. It may be noted that DISCOM to serve agri and allied consumer categories is a pioneering step adopted by GoTG. As per the G.O.Ms.No 44, identified network infrastructure would be transferred to TGRPDCL. Hence, these distribution network assets would be owned by TGRPDCL. These network assets will enable TGRPDCL in fulfilling the obligations of a Distribution Licensee. It is further submitted that the proposed arrangement is not the creation of a parallel or overlapping network but a structured reallocation of existing distribution assets, with clear demarcation of consumer categories and service obligations. Such restructuring is intended to enhance operational focus, improve service delivery to the agricultural segment, and ensure better accountability.

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	In view of the above definitions, the ownership of assets proposed to be vested with TGRPDCL remains unclear and ambiguous, thereby creating uncertainty regarding the deployment of personnel for operation and maintenance, assignment of responsibilities, budgeting, and undertaking CAPEX requirements whenever necessary. Unless there is clear and unambiguous demarcation of asset ownership, there is a significant likelihood of deficiencies in consumer service, thereby defeating the very primary objective of the proposed arrangement. We are of the considered view that there are legal and regulatory hurdles in complying with the requirements for grant of a “Distribution License” to TGRPDCL. Unless these concerns are adequately clarified through an appropriate Government Order, we respectfully submit that the issuance of the license may be kept in abeyance, if not rejected.	
131.	Statement of Objectives We note with regret that neither the petition filed by TGRPDCL for grant of license dated 06/04/2026 nor GO MS No. 44 dated 17/12/2025 contains a well-defined “Statement of Objectives” for the formation of the proposed new DISCOM. There is no clear explanation regarding the shortcomings of the existing two DISCOMs in achieving the intended objectives, nor is there any clarity on how the proposed DISCOM would overcome the present deficiencies.	TGRPDCL submits that the objectives of the proposed DISCOM are set out in G.O. Ms. No. 44 dated 17.12.2025 and the application i.e., to provide focused service to agricultural and allied consumers, improve efficiency, and strengthen financial viability of all three DISCOMs. Service quality to agricultural and allied consumer categories would improve through focused approach. Also separate

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	The inclusion of a “Statement of Objectives” is an established and accepted practice in the introduction of any new Act, Regulation, or major amendment thereto, in order to ensure transparency and provide clarity regarding the intended purpose and expected outcomes. The formation of TGRPDCL constitutes a major structural change intended to serve the agricultural sector. It is, therefore, essential that a comprehensive “Statement of Objectives” be provided. Accordingly, we request the Hon’ble Commission to direct TGRPDCL to submit such a statement, along with the additional information referred to below, so as to substantiate its claim for grant of a “Distribution License.” Further, GO MS No. 44 dated 17/12/2025 refers to the poor financial health of the existing DISCOMs in meeting the commitment of providing free power supply to the agricultural sector. The GO further states “to address the said concern and to improve the electricity supply position of the state, the Government decided to set up the third DISCOM in the state responsible for handling electricity for specific consumer categories supported by Government.” We are unable to comprehend how the formation of a Rythu DISCOM with an equity base of only Rs. 5 crores would mitigate the serious financial health issues presently faced by the existing two DISCOMs. This concern becomes even more significant since, as explained later, the proposed	Consumer Grievance Redressal Forums will be established for TGRPDCL. Safety concerns for supply to agricultural consumers will also be addressed The key advantages include improved quality and reliability of supply through focused infrastructure development and better operations and enabling participation of DISCOMs in infrastructure improvement initiatives like RDSS. The allocation of assets, liabilities, and PPAs is undertaken as part of a comprehensive restructuring exercise to achieve financial balance and operational efficiency across all three DISCOMs.

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	DISCOM appears to have no independent revenue streams or scope for cross-subsidy support, with the only likely source of revenue being the Government subsidy expected to be received. Further, GO MS No. 44 dated 17/12/2025 states that, out of the total consumer arrears of Rs. 35,983 crores, nearly 79%, amounting to Rs. 28,486 crores, would stand transferred to TGRPDCL. In addition, the proposed DISCOM would also inherit liabilities of Rs. 26,950 crores payable to the State GENCOs, along with a working capital burden of Rs. 9,032 crores. This does not appear to provide a sound financial foundation for a newly formed TGRPDCL, which would commence operations with Government receivables exceeding Rs. 35,000 crore and liabilities of a similar magnitude as of the end of 2025. Such a financial structure raises serious concerns regarding the long-term viability and sustainability of the proposed entity.	
132	Business Plan Details We refer to Schedule E of the application, particularly Seriatim 20, which pertains to details of debt, proposed borrowings from lenders, and letters of financial support. The application, however, is substantially silent on these critical aspects and merely states that the same are “yet to be tied up.”	TGRPDCL submits as follows: The application or applicant does not presume prior approval of the licence. The submission of detailed business plans, projections, and funding arrangements post grant of licence is in accordance with Clause 38.1 of Regulation 04 of 2016. The application, as filed, contains all requisite particulars for

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	Further, seriatim 22, relating to the “Approach & Methodology,” identifies four consumer categories, but states that the detailed business plan “will be submitted within three months.” Similarly, seriatim 23, which seeks data relating to the applicant’s future business plans, including five-year projections covering maintenance, O&M, growth, expansion, and funding arrangements to meet such obligations, has been responded to by stating that the information “will be submitted within three months of the distribution license coming into force, as per Clause 38.1 of Regulation 04 of 2016 (Distribution License Regulations).” Such replies appear to presume prior approval of the license application before the submission of the very information necessary for evaluating the applicant’s technical and financial capability. In our respectful submission, the application in its present form is materially incomplete, and it is highly regrettable that such an incomplete application has progressed to the stage of public hearing. We further submit that there appears to be no immediate urgency warranting consideration of this incomplete application at this stage. Accordingly, we suggest that TGRPDCL be directed to submit a comprehensive and detailed application containing all requisite particulars before the matter is taken up for further consideration.	consideration at this stage in compliance with the applicable regulatory framework.

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133.	Question of Financial Sustainability of TGRPDCL The estimated Cost of Service (COS) for TGRPDCL, based on the present annual consumption of approximately 35,000 MU, would be nearly Rs. 20,000 crore, considering the current Average Billing Rate (ABR) of about Rs. 5.85 per kWh. At present, this cost is partly met through Government subsidy of around Rs. 8,000 crores, while the remaining burden is supported through cross-subsidy contributions from HT and commercial category consumers. However, in the case of the proposed DISCOM, there appear to be no cross-subsidizing consumer categories within its consumer base. In the absence of such revenue support, it remains unclear as to how TGRPDCL can achieve financial sustainability and long-term viability as a distribution company.	The allocation of assets, liabilities, and PPAs among the three DISCOMs is being undertaken in a manner that ensures financial sustainability. As per G.O. Ms. No. 8 dated 08.05.2026, a higher share of renewable energy is allocated to TGRPDCL, which is expected to reduce its overall cost of supply. Further, uniform retail tariffs across the State are being maintained. In addition, cross-subsidy is to be progressively reduced in accordance with the existing legal and regulatory framework. Accordingly, through appropriate PPA allocation, assets and liabilities transfer the financial sustainability and viability of TGRPDCL are ensured.
134.	We also regret to observe that the petitioner's response under Section 23, stating that the required information "will be submitted within three months of the Distribution License coming into force," suffers from inherent defect of presuming approval from a statutory authority even before mandatory details are furnished and evaluated. Such an approach is wholly unacceptable from any applicant, particularly from a public sector entity. We respectfully submit for the consideration of this Hon'ble Commission whether an application of similar nature filed by a private sector applicant	TGRPDCL submits that the five-year business plan will be submitted to the Hon'ble Commission within three months of licence grant as required under "Clause 38.1 of Regulation 04 of 2016 (Distribution License Regulations). <i>Extract from regulation "38.1 Subject to other regulations notified by the Commission, the Distribution Licensee shall submit a Business Plan within three (3) months of the Distribution Licence coming in force for such period as the Commission may direct and</i>

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	would have progressed to the stage of public hearing without submission of the requisite particulars.	<i>shall update such plan annually. The Business Plan shall, inter-alia, contain (i) year wise load growth, (ii) year wise Distribution loss reduction proposal along with specific action plan, (iii) metering plan for metering interface points, (iv) treatment of previous losses, (v) cost reduction plan, and (vii) other important financial analysis or parameters.</i> It may also be noted that the CMD and Board of Directors, the management team and operation staff have vast experience in all aspects of operation of a distribution network. Hence the apprehensions of the objector are addressed.
శ్రీ డి.దేవయ్య, రాజన్నపేట(గ్రా.), ఎల్లారెడ్డిపేట (మం.), సిరిసిల్ల(జి.) వారికి సమాధానం:		
135.	28.05.2026 రోజున సమస్యలు సలహాలు గురించి మీరు ప్రజా సహాయార్థం గురించి ఏర్పాటు చేసిన సభలో శ్రీ. ద్యాప దేవయ్య, రాజన్నపేట(గ్రా.), ఎల్లారెడ్డిపేట(మం.) . నాకు మాటలాడుటకు 5-10 నిమిషాలు సమయం ఇవ్వగలరని మీకు విజ్ఞప్తి చేయుచున్నాను.	మీ వినతిని TGRPDCL గౌరవపూర్వకంగా స్వీకరిస్తుంది. సభ కార్యక్రమ నిర్వహణకు అనుగుణంగా మీకు మాట్లాడుటకు తగిన సమయం కేటాయించబడును. ధన్యవాదములు.
శ్రీ యం. ఏ. వజీర్, TSPEU,1535 వారికి సమాధానం:		

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136.	1. జెన్కో నుండి వెళ్లిన వారికి ఆ జీతభత్యాలే ఉంటాయా? ఉండవా? జనరేటింగ్ అలవెన్స్ ఉంటుందా? ఉండదా? ఆ అలవెన్సులు ఉంటాయా? ఉండవా? 2. ఉద్యోగస్తులకు నెల నెల జీతాలు 1వ తారీఖున వస్తాయా? రావా? అనే అనుమానాలు ఉన్నాయి. 3. ఈ విద్యుత్ సంస్థలలో పనిచేస్తున్నటువంటి ఆర్థికజ్ఞు వీరికి ఏ ప్రమోషన్లు ఇస్తారు? వీరికి ఇంక్రిమెంట్లు ఎన్ని ఇస్తారు? 4. రైతు డిస్కాంకు 42 శాతం వాటా తేల్చారు. ప్రభుత్వం వారు శాంక్షన్ పోస్టు ఎందుకు ఇవ్వలేదు? 5. జి.పి.ఎఫ్ పెన్షన్ దారులకు రిటైర్డ్ అయినా తరువాత పెన్షన్ ఎవరు ఇస్తారు? అది కూడా తెలవాల్సి ఉన్నది.	1. జనరేషన్ అలవెన్స్ చెల్లించబడదు. ప్రస్తుత క్యాడర్ లో అమలులో ఉన్న జీతభత్యాలు కొనసాగించబడును. 2. ప్రస్తుతం చెల్లిస్తున్న విధంగానే ఉద్యోగుల జీతాలు సమయానికి చెల్లించబడును. 3. ఒక ఇంక్రిమెంట్ మంజూరు చేయబడును మరియు ప్రస్తుతం ఉన్న అదే కేడర్ కొనసాగించబడును. 4. ప్రస్తుతం ఉన్న పనిని కొత్త డిస్కాం మరియు మాతృ డిస్కాం మధ్య విభజించినందున కొత్త పోస్టుల మంజూరు అవసరం లేదు. భవిష్యత్తులో అవసరాన్ని బట్టి మరిన్ని ఉద్యోగులను నియమించబడతారు. 5. జి.పి.ఎఫ్ ప్రస్తుతం అమలులో ఉన్న విధానానుసారమే కొనసాగించబడును.
Response to Sri.J Sampath Rao, Secretary,BKS,Telangana		
137.	I,J.Sampath Rao(Secretary,BKS,Telangana) request you sir, give permission to participate in discussion about rythu discom on 29/5/62, request you sir, give permission to participate in discussion about rythu discom on 29/5/62.	TGRPDCL respectfully acknowledges your request. Suitable time will be allotted to you for speaking in accordance with the conduct of the meeting proceedings. Thank you.

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